

**Agenda Item No: 7**

**Proposed response to Cambridge City Council Air Quality Action Plan Consultation**

*To:* **Health Committee**

*Meeting Date:* **Thursday 13<sup>th</sup> September 2018**

*From:* **Director of Public Health**

*Electoral division(s):* **All**

*Forward Plan ref:* **n/a** *Key decision:* **No**

*Purpose:* **To outline the proposed response to the Cambridge City Air Quality Action Plan consultation**

*Recommendation:* **The Health Committee is asked to comment on and agree the proposed consultation response.**

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## **1. BACKGROUND**

- 1.1** Local authorities in the UK are required to carry out a review and assessment of air quality in their area. This involves measuring air pollution and trying to predict how it will change in the next few years. The aim of the review is to make sure that the national air quality objectives are met. If a local authority finds any area(s) where the objectives are not likely to be met or are being exceeded, it must declare an Air Quality Management Area (AQMA) for that/those area(s). This could be just one or two streets, or it could be much bigger<sup>1</sup>. Local authorities with declared AQMA's are required to prepare and implement an Air Quality Action Plan and carry out further air quality assessments (Stage IV) under the Environment Act 1995.

Cambridge City declared AQMA in the city centre due to exceedances of Nitrogen Dioxide in 2005, the area encompasses the inner ring road and all the land within it (including a buffer zone around the ring road and its junctions with main feeder roads).

Although air quality in Cambridge City has improved over the last few years there are still areas where the air quality objectives are unlikely to be met. Therefore, Cambridge City Council has updated its Air Quality Action Plan (public health are part of the steering group and have contributed to the production of the action plan). The plan sets out priorities for the next five years, for improving areas of poor air quality and maintaining areas of good air quality as Cambridge continues to grow

- 1.2** A consultation on the plan is being run between 21 June 2018 and 18 September 2018, and residents and partners are being asked:
1. What they think of the action plan.
  2. Does it go far enough?
  3. How could it be improved?
  4. What actions could be included in the future?
- 1.3** Given that air quality was identified as a priority by the Health Committee the committee is asked to comment on and agree the proposed consultation response.

## **2 Evidence underlying the action plan**

- 2.1** The main air pollutant of focus in Cambridge City, as part of the Local Air Quality Management process, is nitrogen dioxide (NO<sub>2</sub>). The main source of NO<sub>2</sub> in Cambridge is from vehicle emissions, so the Air Quality Action Plan focuses primarily on ways to reduce these emissions, as well as reducing other sources of air pollution (see Appendix A for more detailed information).

There are also legal limits for small particulate matter less than 10 microns (known as PM<sub>10</sub>). The levels of PM<sub>10</sub> in Cambridge are below the legal limits, however there is no regulatory standard for PM<sub>2.5</sub> (for local authorities in England) or a specific regulatory actions for the Local Authority to reduce emissions or concentrations of PM<sub>2.5</sub>, however, Local Authorities are expected to work towards reducing emissions and concentrations of PM<sub>2.5</sub> in their local area as far as reasonably practicable. In doing so they are not required to carry out any additional local review and assessment (including monitoring) but make

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<sup>1</sup> <https://uk-air.defra.gov.uk/aqma/>

use of national monitoring data. Action to tackle PM<sub>10</sub> and NO<sub>2</sub> would usually contribute to reducing emissions of PM<sub>2.5</sub><sup>2</sup>.

### **3 Brief summary of Cambridge City Air Quality Action Plan**

**3.1** The plan's proposed actions fall into three main categories:

- Reducing local traffic emissions as quickly as possible
- Maintaining levels of pollutants below national objectives
- Protecting public health by improving air quality in the future

The seven main areas for action (the sets of measures) are:

1. Reduce emissions from Taxis by requiring low emission taxis
2. Reduce emissions from Buses and Coaches
3. Reduce emissions from HGVs
4. Reduce emissions from all traffic/other traffic by providing better public transport
5. Maintaining Low Emissions through the planning process and long-term planning
6. Improving Public Health
7. Leading By Example

### **4 Consultation questions and response**

The consultation sets out 14 questions. Responses for questions that have direct public health implications are outlined below, we do not intend to respond to all the questions in the consultation, however if members would like to respond to these, they can be incorporated.

**Question 1. First of all we would like to know if you work in Cambridge and/or are you a resident, a visitor, or a student? Add any comment in the box, including if more than one applies.**

**Proposed response**

*This is a response on behalf of Cambridgeshire Country Council Health Committee rather than an individual resident's response.*

**Question 2. Are you responding as an individual, or on behalf of an organisation? If you are responding on behalf of an organisation, please include the name in the box below.**

**Proposed response**

*This is a response on behalf of Cambridgeshire Country Council Health Committee*

**Question 3. How important do you think the issue of air quality is in Cambridge?**

**Proposed response**

*Very important*

**Question 4. What is your personal experience of poor air quality, if any?**

**Proposed response**

*This is a response on behalf of Cambridgeshire Country Council Health Committee rather than an individual resident's response.*

**Question 5. Do you agree with the overall approach described in the Plan (reduce air pollution, then maintain good air quality, then improve air quality further)? If not, why not?**

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<sup>2</sup> <https://laqm.defra.gov.uk/documents/LAQM-PG16-April-16-v1.pdf>

## **Proposed response**

*We support Cambridge City Council's proposed approach of:*

- Reducing local traffic emissions as quickly as possible*
- Maintaining levels of pollutants below national objectives*
- Protecting public health by improving air quality in the future*

*The focus on reducing traffic emissions is evidence based using source apportionment data (information about the pollution sources and the amount they contribute to measured concentrations) showing that road traffic emissions are the primary source of emissions in the Cambridge Air Quality Management Area.*

*The action plan recognises the challenges associated with local housing growth in the area and the need for plans to mitigate impact on air quality going forward.*

*We are pleased to see a future focus on protecting public health by improving future air quality as although the majority of monitoring sites are below national air quality thresholds they are still close to limits, so a continued focus is needed.*

*The Air Quality Action Plan notes the importance of fine particulates ( $PM_{2.5}$ ) on health whilst also acknowledging that the majority of  $PM_{2.5}$  in Cambridge is due to background levels.*

*The proposed actions to tackle  $NO_2$  locally will support further reductions of  $PM_{10}$  and  $PM_{2.5}$  in hotspots.*

## **Question 6. Can we make any improvement to the overall approach?**

### **Proposed Response:**

#### *Lead by example*

*We welcome Cambridge City's ambition to 'lead by example', however, we would challenge the authority to be more ambitious and look at how wider public sector partners in Cambridge could be involved in supporting the City's ambition. The public sector in Cambridge City is considerable with large anchor institutions<sup>3</sup> such as Cambridge University Hospital Foundation Trust and Cambridge University.*

#### *Mode shift*

*The action plan identifies the importance of shifting modes of transport from individual private cars to active travel. Public health commission the road safety team in Cambridgeshire County Council to deliver "mode shift stars" for schools across Cambridgeshire which is a joint road safety and active travel intervention. Opportunities may exist for shared communication as part of this work.*

*Cambridgeshire County Council are currently developing a new strategic approach to identifying cycling and walking improvements required at the local level. The plans are meant to enable a long-term approach to developing local cycling and walking networks, ideally over a 10 year period. This could provide an opportunity to strengthen active travel interventions across the area.*

*When working with Greater Cambridgeshire Partnership on interventions to improve walking and cycling infrastructure we would ask Cambridge City to also highlight the need for interventions to support behaviour change. Evidence shows that a combination of physical infrastructure and*

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<sup>3</sup> An anchor institution is one that, alongside its main function, plays a significant and recognised role in a locality by making a strategic contribution to the local economy.

*packages of behavioural support are more effective at maximising use of new cycling and walking infrastructure.*

#### *Quality Bus Partnership*

*Although not a direct issue for Cambridge City there are concerns that an unintended consequence of the implementation of the Quality Bus Partnership and requirement for “cleaner” buses serving Cambridge City may lead to less “cleaner” buses being pushed out to other areas in Cambridgeshire which could lead to worsening air quality in other parts of the County.*

**Question 7. Please list the top three actions that should be taken to address air quality in the city. These can be measures already in the Plan or measures that are not included.**

**Proposed Response:**

*We suggest the actions focused on shifting modes of transport from car to cycling, walking or public transport (public transport generally involves walking or cycling at both ends of the journey) will have the greatest impact on health and wellbeing. Modelling studies show that the increased levels of physical activity due active travel lead to greater improvements in health than the related decrease in air pollution.*

**Question 8. We get a few complaints each year about vehicle idling. Does vehicle idling affect you?**

**Proposed Response:**

*Vehicle idling has been identified as an issue in other parts of country with a main focus on Taxis, and parents picking up/dropping off children at school. In Cambridge buses and coaches have also been raised as an issue. There are powers which the City can take through the “Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002”. The logistics of enforcement e.g. getting around a whole city, means that it can only practically be applied at bus stations or taxi ranks, or opportunistically in places where Heavy Good Vehicles or Light Goods Vehicles are parked for lengthy periods<sup>4</sup>.*

**Question 9. Car free days have been in the news recently. Is this something we should consider in Cambridge?**

**Proposed Response:**

Yes - as vehicles are the main source of air pollution in Cambridge City, car free days would likely impact on NO<sub>2</sub> levels in the city. Evidence from Cardiff<sup>5</sup> found that NO<sub>2</sub> levels reduced by 69% during a car free day event. If the aim is to implement Car Free Days as one off events then this needs to be part of a wider plan as to how changes in travel behaviour can be sustained in the longer term.

**Question 10. Everyone is affected by the quality of the air that we breathe and everyone has a role to play to help to improve air quality in Cambridge. Which of these ways to improve air quality do you already do? PLEASE USE Q14 instead, which will allow you to use multiple choices. Apologies for the inconvenience.**

**Proposed Response:**

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<sup>4</sup> <https://www.islington.gov.uk/~/media/sharepoint-lists/public-records/environmentalprotection/information/guidance/20122013/2013013114costeffectiveactionstocutairpollutioninlondon>

<sup>5</sup> <https://www.airqualitynews.com/2018/07/11/cardiff-sees-no2-reduction-on-car-free-day/>

*This is a response on behalf of Cambridgeshire Country Council Health Committee rather than an individual resident's response.*

**Question 11. What action would you be willing to take to improve air quality?**

**Proposed Response:**

*Cambridgeshire County Council Public Health Directorate is already represented on the Cambridge Air Quality Action Plan group and will continue to work closely with the City Council.*

*Air quality is one of the priorities of the Cambridgeshire Health Committee and a programme of work is ongoing. Our desire is to add value and support partners by working at scale across the county.*

*One common area which has been identified by recent stakeholder events is the need for more accessible, robust and targeted information and materials on air quality and its impact on health. We would welcome joint working with Cambridge City on this issue to take it forward.*

*Public Health England continue to publish new evidence and tools on the health impact of air quality e.g. the new air quality modelling tool which looks at the impact of air pollution on the local incidence of disease and hospital admissions. Public Health will work with Cambridge City to maximise the use of these tools.*

*When responding to Local Plan consultations and policy documents we will continue to raise air quality as an issue. We will look to influence strategic documents such as the Quality Charter for Inclusive growth which is being developed on behalf of the Combined Authority.*

**Question 12. What are the things which prevent you from doing these things now?**

**Proposed Response:**

*Addressing poor air quality is complex and the air quality agenda is not owned by a single organisation but rather different public sector organisations across the system are responsible for different aspects (i.e. monitoring is the responsibility of the District and City Councils, transport interventions lie with the County Council and Combined Authority – as the transport authority).*

**Question 13. Do you have any other comments to make about improving air quality in Cambridge?**

**Proposed Response:**

*No other comments*

**14. Everyone is affected by the quality of the air that we breathe and everyone has a role to play to help to improve air quality in Cambridge. Which of these ways to improve air quality do you already do?**

**Proposed Response:**

*This is a response on behalf of Cambridgeshire Country Council Health Committee rather than an individual resident's response.*

## **5 ALIGNMENT WITH CORPORATE PRIORITIES**

**5.1 Developing the local economy for the benefit of all**

**5.2 Helping people live healthy and independent lives**

**5.3 Supporting and protecting vulnerable people**

## **6 SIGNIFICANT IMPLICATIONS**

### **6.1 Resource Implications**

*There are no significant implications within this category.*

### **6.2 Procurement/Contractual/Council Contract Procedure Rules Implications**

*There are no significant implications within this category.*

### **6.3 Statutory, Legal and Risk Implications**

*There are no significant implications within this category.*

### **6.4 Equality and Diversity Implications**

*There are no significant implications within this category.*

### **6.5 Engagement and Communications Implications**

*There are no significant implications within this category.*

### **6.6 Localism and Local Member Involvement**

*There are no significant implications within this category.*

### **6.7 Public Health Implications**

*See main body of the report.*

<b>Implications</b>	<b>Officer Clearance</b>
<b>Have the resource implications been cleared by Finance?</b>	Yes Name of Financial Officer: Clare Andrews
<b>Have the procurement/contractual/Council Contract Procedure Rules implications been cleared by the LGSS Head of Procurement?</b>	Yes Name of Officer: Paul White
<b>Has the impact on statutory, legal and risk implications been cleared by LGSS Law?</b>	Yes Name of Legal Officer: Duncan Dooley-Robinson

<b>Have the equality and diversity implications been cleared by your Service Contact?</b>	Yes Name of Officer: Dr. Liz Robin
<b>Have any engagement and communication implications been cleared by Communications?</b>	Yes Name of Officer: Matthew Hall
<b>Have any localism and Local Member involvement issues been cleared by your Service Contact?</b>	Yes Name of Officer: Dr. Liz Robin
<b>Have any Public Health implications been cleared by Public Health</b>	Yes Name of Officer: Dr. Liz Robin

Please include the table at the end of your report so that the Chief Executive/Executive Directors/Directors clearing the reports and the public are aware that you have cleared each implication with the relevant Team.

### **SOURCE DOCUMENTS GUIDANCE**

*It is a legal requirement for the following box to be completed by the report author.*

<b>Source Documents</b>	<b>Location</b>
Cambridge City Air Quality Action Plan	<a href="#">Web link to AQAP</a>
Consultation document	<a href="#">Web link to consultation document</a>
Consultation survey	<a href="#">Survey link</a>



## Appendix A

### Findings of Cambridge City Council source apportionment exercise in 2017.

NO2	PM10	PM2.5
<p><b>City Centre</b> - NOx sources 81% of NOx emissions are from Roads, of which 45% NOx are emitted from buses, 31% from HGV, 9% from taxis, 8% from cars, and 6% from LDV (LGV).</p> <p><b>Ring Road</b> - NOx sources 73% of NOx emissions are from Roads, of which 14% NOx are emitted from buses, 19% from HGV, 4% from taxis, 43% from cars, and 20% from LDV (LGV).</p>	<p>Background estimates across Cambridge vary between 15 and 17 micrograms per cubic metre (2016), with an average of 16 micrograms per cubic metre. PM10 is measured at three locations in Cambridge – Gonville Place, Montague Road (adjacent to Elizabeth Way) and Parker Street. These stations recorded 20 – 22 micrograms per cubic metre annual mean in 2016, demonstrating that around 25% of PM10 in Cambridge is locally derived. The Source Apportionment study demonstrated that most of the additional PM10 in Cambridge results from traffic, with a component from demolition and construction dust.</p>	<p>Background maps shows that most background PM2.5 has a regional component (95%). Estimates across Cambridge vary between 11 and 12 micrograms per cubic metre (2016). PM2.5 is measured at two locations in Cambridge – Gonville Place and Newmarket Road. Recent measurements of PM2.5 at Newmarket Road indicate that there is a very small roads component in this location (11 micrograms per cubic metre annual mean), but at Gonville Place there is an additional contribution of up to 3 micrograms per cubic metre PM2.5 34 (15 micrograms per cubic metre annual mean). Most parts of Cambridge have 'background' levels of PM2.5 but it appears likely that hotspots are present in locations of high traffic density.</p>