

LONDON BOROUGH OF HAMMERSMITH & FULHAM

Report to: Cabinet

Date: 16/12/2024

Subject: Adoption of Hammersmith & Fulham Council's new Air Quality Action Plan 2025-30

Report of: Councillor Wesley Harcourt, Cabinet Member for Climate Change and Ecology
Councillor Sharon Holder, Cabinet Member for Public Realm
Councillor Max Schmid, Chief Whip

Report author: Adam Webber, Air Quality Policy and Strategy Lead

Responsible Director: Bram Kainth, Executive Director of Place

SUMMARY

Hammersmith & Fulham is the tenth worst local authority in England for air pollution - with 7.4% of deaths linked to toxic air, according to Public Health England¹.

Toxic air can lead to dementia, cancers, heart disease, asthma, lung problems and early death. Children are particularly sensitive to dirty air as their body and lungs are developing.

Figures from 60 monitoring stations across H&F show there is not a single part of the borough where the air quality meets World Health Organisation targets. H&F is committed to reducing the exposure of people to poor air quality. We also have the aim of being the greenest local authority.

This report recommends the implementation of the council's new Air Quality Action Plan 2025-2030 to help tackle dangerous levels of air pollution in H&F and help deliver the Council's Net Zero 2030 target.

This plan aims to protect the health and wellbeing of the people who live, work in and visit the borough from the effects of air pollution, and to promote healthy living by protecting children and families from filthy air.

Key goals for the council are: tackling the sources of pollution that the council can control; raising residents' and businesses' awareness of the dangers of air pollution; and working with the Greater London Authority and Transport for London to make the improvements needed to reduce pollution in the borough and across London.

In order to achieve this, we have the following key priorities:

- Provide the necessary infrastructure to enable more active travel, such as walking, wheeling, and cycling;
- Develop Clean Air Neighbourhood projects, including tree planting, sustainable drainage systems and traffic and pollution reduction measures, where supported by residents;

¹ Public Health England Outcomes Framework | [fingertips.phe.org.uk](https://www.fingertips.phe.org.uk)

- Work collaboratively with our partners and stakeholders on innovative policies and projects;
- Support residents and businesses to adopt car-sharing and clean vehicles;
- Reduce building emissions by replacing older boilers with clean heat networks and heat pumps;
- Address indoor pollution, a new area of concern given how long we all spend indoors and in our homes and offices;
- And tackle pollution at schools, as well as journeys to and from, through initiatives such as School Streets Plus.

RECOMMENDATIONS

1. To agree the adoption of the Council's new Air Quality Action Plan 2025-30.

Wards Affected: All

Our Values	Summary of how this report aligns to the H&F Values
Building shared prosperity	Improved air quality and improved health and wellbeing will positively impact on the economy of the borough, from reducing sick days and increasing productivity, to having healthier and happier individuals and businesses. Tackling air pollution and the climate emergency will also result in opportunities for us to support the green economy in the borough.
Creating a compassionate council	Air pollution disproportionately affects the young, the old, the vulnerable, those less well-off and those from Black, Asian and Minority Ethnic backgrounds. By improving air quality across the borough, we will be reducing inequalities and creating a fairer and more equitable borough for all.
Doing things with local residents, not to them	Air pollution is not something the council can wholly tackle on its own. As well as being co-created with our residents through a public consultation, this Action Plan aims to empower our residents, schools, businesses and other stakeholders to take action to reduce their emissions, and reduce their exposure to harmful pollution.
Being ruthlessly financially efficient	There is a strong co-benefit between many actions to improve air pollution, and actions to reduce our carbon emissions. The benefits of improved health and wellbeing from cleaner air will also be seen in a reduced financial burden on the NHS and on adult social care and children's services. Many of the successful projects we have implemented to date on air pollution have been the result of successful grant funding applications.

Taking pride in H&F	Tackling air pollution will result in a cleaner, greener, healthier borough. As well as the benefits of improved health across our communities from cleaner air, there are other areas that this Action Plan will support, from improved health and wellbeing from increased active travel, to the mental health benefits of high quality green space across the borough.
Rising to the challenge of the climate and ecological emergency	Tackling air pollution is a key component of our wider environmental work that will support our ambitions of being a net carbon zero borough by 2030. As well as seeking to meet our statutory obligations, this Action Plan goes further in affirming our commitment to meeting the stringent World Health Organisation guidelines for air quality. Improved air quality will also support other key climate challenges: there are co-benefits between air quality and carbon emissions, biodiversity and green space, noise and waste emissions.

Financial Impact

There is no direct cost associated with the adoption of the Air Quality Action Plan (AQAP) 2025-30. Table 4.1 of the AQAP provides a list of 40 headline actions for implementation with estimated costs and indicative funding source(s). Funding is expected to come from a variety of sources, including existing approved budgets across the Council (marked as ‘normal business’ in the action plan), external grant funding for specific projects and actions, and other existing external funding (such as the carbon offset fund and appropriate s106 and CIL). This report does not seek approval for any new or additional funding. Should that be required, this will be considered as a separate report(s) in accordance with the Council’s governance framework.

Kellie Gooch, Head of Finance (Environment), 20 May 2024.

Danny Rochford, Head of Finance (Housing Revenue Account & Economy), 3 December 2024

Verified by: Sukvinder Kalsi, Executive Director Finance & Corporate Services, 3 December 2024

Legal Implications

The whole of the borough of Hammersmith & Fulham is a designated Air Quality Management Area. Section 83 of Part IV of the 1995 Environment Act (“1995 Act”) requires local authorities to designate an Air Quality Management Area (“AQMA”) where air quality objectives, as set out in the 2000 Regulations, are not being achieved, or are not likely to be achieved within the relevant period.

Once the area has been designated, section 84 requires the local authority to develop an “Air Quality Action Plan” detailing remedial measures to tackle the problem within the AQMA.

This Air Quality Action Plan fulfils this requirement, and the Plan has been developed in consultation with the GLA, who manage the London Local Air Quality Management function per Part IV of the 1995 Act.

The appropriate decision maker is the Cabinet.

The decision is a Key Decision and the report must be submitted to Committee Services for publication on the Council's website.

Angela Hogan, Chief Solicitor (Contracts and Procurement), 3 December 2024

Background Papers Used in Preparing This Report

None

DETAILED ANALYSIS

Proposals and Analysis of Options

1. Tackling air pollution is a policy priority for the Council. It actively supports one of the Council's key values, that of rising to the challenge of the climate and ecological emergency. That is why this Action Plan reaffirms the Council's commitment to meeting the World Health Organization guidelines for air quality across the borough, which are more stringent and ambitious than the national objectives given to us by central Government.
2. The evidence is incontrovertible that air pollution affects health. Poor air quality is the largest environmental risk to public health in the UK². Long term exposure to pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer. It can cause the onset of asthma and has impacts throughout all stages of life, from pre-natal through to later years. As such, it is a burden on the NHS and social care services, with costs to the NHS if strong action isn't taken estimated at approximately £5.4bn by 2035³.
3. There is also an equalities angle to air pollution: it disproportionately affects vulnerable communities, those less well off, and those from Black, Asian and Minority Ethnic backgrounds⁴. Our work to improve air quality will therefore contribute towards the Council's efforts to create a more equal and fairer borough for everyone.
4. The Council also has a statutory duty to tackle pollution. Pursuant to our statutory duties as a designated Air Quality Management Area, the Council is required to

² UK Government: Health Matters – Air Pollution | [Health matters: air pollution - GOV.UK \(www.gov.uk\)](https://www.gov.uk/health-matters/air-pollution)

³ Estimating the costs of air pollution to the National Health Service and social care: An assessment and forecast up to 2035 | [Estimating the costs of air pollution to the National Health Service and social care: An assessment and forecast up to 2035 — UK Health Security Agency \(ukhsa.gov.uk\)](https://www.ukhsa.gov.uk/estimating-the-costs-of-air-pollution-to-the-national-health-service-and-social-care)

⁴ Greater London Authority air quality exposure and inequalities study 2023 | [Air Pollution and Inequalities in London - update 2023 | London City Hall](https://www.london.gov.uk/inequalities-in-london)

have an Air Quality Action Plan. The Plan, recommended in this report for adoption, fulfils these statutory requirements, and sets out how the Council will work to meet national objectives for air pollution and help improve the health and wellbeing of everyone in the borough over the next five years.

5. As a statutory document, we are relatively restricted in the style and format of the Plan. As a result, a public-facing summary version of the Plan will be produced in order to provide the best possible advice to our residents on the dangers of pollution and the action they can take to both reduce their own emissions, and reduce their exposure to dirty air. Members will be consulted on the look and feel of this document once the main AQAP has been adopted. A section of the designed up AQAP itself is attached to this report (Appendix 5) to give an early look at the design (rather than the copy within it) – again, the Plan will be fully designed up once the text of the AQAP (Appendix 1) has been adopted.
6. The draft Plan recommended for adoption in this report has been subject to internal consultation and review, and an external public consultation phase. Several changes to the Plan were made as a result of the public consultation, and feedback from Cabinet members, which are set out in Appendix 3.
7. The original consultation version of the Plan was dated 2024-29. However, to reflect the expected adoption date of the Plan, this has been amended to 2025-30 in consultation with the relevant Cabinet members. This also aligns the Plan to our wider Net Zero 2030 Strategy and goals.
8. The Plan is made up of two key elements. The first section is the context of air pollution in Hammersmith & Fulham. It sets out the health impacts of air pollution, and the links between our work on air quality and our wider work on climate change. Details are included on the sources of air pollution, the levels of air pollution across the borough, and how pollution levels have changed over time (and are forecast to change in future years). The second section is the statutory action plan matrix, which consists of 40 headline actions the Council will take over the next five years.
9. The 40 headline actions within the Plan are split into seven categories, which are taken from the GLA's air quality action plan matrix:
 - **Monitoring and other core statutory duties:** maintaining monitoring networks is critical for understanding where pollution is most acute, and what measures are effective to reduce pollution. There are also a number of other very important statutory duties undertaken by boroughs, which form the basis of action to improve pollution;
 - **Localised solutions:** where supported by residents, these seek to promote healthy living and improved air quality through Clean Air Neighbourhood measures including: traffic and pollution reduction trials, sustainable drainage systems, tree planting, schools streets initiatives and improved infrastructure for walking and cycling;
 - **Emissions from developments and buildings:** it is modelled that emissions from buildings will soon overtake transport emissions as the single biggest

source of NO_x emissions in the borough. Tackling emissions from buildings also results in co-benefits to our work reducing carbon emissions across H&F;

- **Public health and awareness raising:** increasing awareness can drive behavioural change to lower emissions as well as to reduce exposure to air pollution;
- **Delivery servicing and freight:** vehicles delivering goods and services are usually light and heavy-duty diesel-fuelled vehicles with high primary NO₂ emissions;
- **Borough fleet actions:** our fleet includes light and heavy-duty diesel-fuelled vehicles such as mini buses and refuse collection vehicles with high primary NO₂ emissions. Tackling our own fleet means we will be leading by example;
- **Cleaner transport:** road transport is the main source of air pollution in London. We need to incentivise a change to walking, cycling and ultra-low emission vehicles (such as electric) as far as possible.

10. Ownership of the actions within the AQAP are spread across the Council. These are listed within the Plan, alongside details of the governance of the Plan and how we will report on progress. It is a statutory duty for the Council to provide Annual Status Reports, signed off by the GLA, which give updates on progress against AQAP actions in the previous calendar year. These Annual Status Reports can be found on the Council's website.
11. At the end of the Plan is a series of checklists of recommendations for individuals / community groups, schools and businesses; these are aimed at enabling these groups to take immediate action to both reduce their exposure to harmful air pollution, and also reduce their own emissions.
12. It should be noted that the Plan, while in place for five years, can be considered a 'living document', and changes to it, including updates to actions, can be made within its life span. Part of the draft design version of the Plan is appended to this report to provide an overview of the visual style proposed for the final AQAP.

Reasons for Decision

13. Pursuant to our statutory duties as a designated Air Quality Management Area, the Council is required to have an Air Quality Action Plan. The Plan, recommended in this report for adoption, fulfils these statutory requirements, and sets out how the Council will work to meet national objectives for air pollution and help improve the health and wellbeing of everyone in the borough over the next five years.
14. The AQAP has been produced in consultation with stakeholders including the GLA, and subject to a statutory public consultation. Following this, the current draft AQAP 2025-30 is recommended for adoption by the Council.

Equality Implications

15. An Equalities Impact Assessment screening assessment has been undertaken for this work. The screening assessment found no negative impacts on any

protected characteristic groups, and several instances of positive impacts on protected characteristic groups. The screening assessment is appended to this report (Appendix 4).

Risk Management Implications

16. There are no significant risks to this initiative.

Jules Binney, Risk and Assurance Manager, 3 December 2024

Climate and Ecological Emergency Implications

17. Tackling air pollution is a key component of our wider environmental work that will support our ambitions of being a net carbon zero borough by 2030. As well as seeking to meet our statutory obligations, this Action Plan goes further in affirming our commitment to meeting the stringent World Health Organisation guidelines for air quality.

18. Improved air quality will also support other key climate challenges: there are strong co-benefits between air quality and carbon emissions, biodiversity and green space, noise and waste emissions.

Hinesh Mehta, Assistant Director Climate Change, 3 December 2024

Consultation

19. The consultation version of the AQAP was designed in consultation with the GLA, who manage the London Local Air Quality Management process.

20. A public consultation for the draft AQAP was undertaken in December 2023 – February 2024 via the Council’s ‘Have your say’ online consultation portal. The consultation report capturing the results and feedback received is appended to this report (Appendix 2). As a result of the consultation, a number of changes were made to the draft Plan: these are summarised in the change tracker also appended to this report (Appendix 3).

LIST OF APPENDICES

1. Draft Hammersmith & Fulham Air Quality Action Plan 2025-30
2. Consultation report for the AQAP 2025-30⁵
3. Consultation change tracker for the AQAP 2025-30
4. Equalities Impact Assessment screening assessment for the AQAP 2025-30
5. For design reference - draft section of the designed AQAP 2025-30⁶

⁵ Note that during the consultation the AQAP was dated 2024-29, rather than the proposed dates for adoption of 2025-30 agreed with Cabinet Members (see paragraph 7 of this report). As such the title of the pdf report and references throughout this document are to 2024-29.

⁶ Note that when this design draft was produced, the AQAP was dated for 2024-29. This has now been updated. See footnote 5 above.