



Fair Transition Unit

CLEAN AIR

BRIEFING 1: CAMPAIGNERS

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IPPR's **Fair Transition Unit (FTU)** was established in June 2022 as a new landmark initiative to carry forward the work of IPPR's cross-party Environmental Justice Commission and award-winning work on environmental breakdown.

The FTU's mission is "to accelerate progress in reducing emissions and restoring nature and secure a fairer, more just and thriving society". To realise this mission, the FTU delivers projects, programmes and support to others focused on securing a fair transition to net zero and the restoration of nature.

The Environmental Justice Commission drew on views and recommendations from citizens from across the country in a way that has genuinely shaped policy thinking and had tangible policy and media impact. Building on this legacy, the FTU puts the public at the heart of its work through extensive public deliberation.

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ABOUT THIS PAPER

This briefing paper is written for local clean air campaigners and the wider movement for action to improve air quality. It covers some of the main issues and opportunities for local authorities to improve air quality. There are a number of further interventions that local authorities can take that can be found in the main report. This work draws on interviews, focus groups and workshops with members of the public, local authority officers and councillors, desk-based research, and councillor polling.

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SUMMARY

- Current air quality targets are not ambitious enough. There are no safe limits for exposure to PM_{2.5}, and the impacts of all air pollutants disproportionately impact people who live on lower incomes, those from minoritised communities, children, older people, and those with health conditions. **Government and local authorities should adopt the World Health Organisation (WHO) guidelines with a target to achieve them by 2030.**
- Local authorities already have several powers to act on clean air. This includes implementation of school streets,¹ provision of active travel infrastructure, enforcement of smoke control areas and the inspection and permitting of industrial facilities. Interventions work best when delivered in combination and on large-scale but there are also many low-cost, quick actions that local authorities could take that would deliver air quality improvements.
- Although that have the powers to act, many local authorities feel they lack the resources and capability to deliver effective and fair clean air policies, and have concerns about political and public opposition to air quality measures. Political leadership is key to making clean air a priority and driving through action in the face of these challenges.
- Campaigners and advocates can play several roles in shaping action on clean air. Having a clear vision for your local area, drawn up with others in the community, can be a powerful tool when communicating with councillors. There is also a role in holding elected representatives (both councillors and MPs) to account.

BACKGROUND

The effect of air pollution on health requires urgent action to clean our air, from increased rates of asthma, lung cancer and dementia, to issues during pregnancy and slower development of lung function in children.

There are multiple co-benefits to acting on clean air. Most actions to improve air quality also result in a reduction of carbon emissions, improve public transport provision and reliability, support people to live more active lives, and help make our towns and cities more pleasant overall through creation of green spaces and people-friendly streets. Housing retrofit offers an opportunity to tackle the carbon emissions associated with heating, whilst also addressing the air quality issues caused by gas boilers. Better ventilation also helps address damp and mould, both of which produce harmful air pollution.

¹ School streets are the temporary restriction of motorised traffic on a road outside a school at school drop-off and pick-up times. They can be enforced physically, with temporary bollards and people standing in the street, or with automatic number plate recognition (ANPR) cameras.

WHAT DO YOU NEED TO KNOW?

What are local authorities' duties on air quality?

There are three laws that give lower tier local authorities² specific duties on air quality and stopping pollution. This includes **environmental permitting** (for example industrial emissions),³ **smoke control** (for example smoke control areas in urban areas and making sure the right fuel is on sale) and through **local air quality management**.

Under local air quality management, local authorities must consider the National Air Quality Strategy. They have to monitor and assess air quality in their area. If they find that the concentration of pollutants in the air exceeds the limits set in the strategy, and that local people are exposed to these (known as relevant exposure) they must declare air quality management areas (AQMA). This requires the local authority to develop an action plan that outlines the actions they will take to comply with the limits set in the standards. Commonly, air quality management areas relate to traffic-related nitrogen dioxide (NO₂). An air quality management area can be one street or an entire local area.

Many AQMAs have been in place for many years without seeing improvement. The Environment Act 2021 has shortened the time allowed for local authorities to declare AQMAs and prepare action plans, which must outline the measures they will take and date by which each measure will be delivered. Reporting is also being more actively monitored and reviewed by national government.

Local authorities have a duty to publish air quality information regularly and transparently, and many do. However, *“often this is hard to read, buried deep on council websites, years out of date, or is simply missing”* (Defra 2023). The public can ask their local authority for this information if they cannot find it.

TABLE 1. LOCAL AUTHORITY DUTIES AND THE POWERS AVAILABLE TO THEM TO IMPROVE AIR QUALITY

	Local air quality management	Smoke control	Environmental permitting
Primary duties and powers	Monitoring and assessment, if in exceedance, declare an AQMA	Communication and enforcement of smoke control areas	Duty to publish a register of all the permitted installations in the local area

² Lower tier local authorities includes district and unitary councils, including city and borough councils. County councils or combined authorities are known as upper tier local authorities.

³ Big industry is regulated by the Environment Agency, but smaller installations by local authorities.

	Develop an air quality management plan and deliver the mitigations	Enforcing trading standards and correct fuel sales	Inspections and enforcement (of specific installations)
Secondary duties and powers	Transport and highways Local planning Green infrastructure	Communication of smoke control areas	

Source: Author's analysis

Local authorities can also be forced to improve air quality through a Ministerial Direction, where the government tells them they must reduce NO₂ emissions in the shortest possible time. This is administered by government's Joint Air Quality Unit (JAQU) which provides funding and support from central government. Most local authorities under ministerial direction are told to develop a proposal for a clean air zone (CAZ) – as this reduces the number of polluting vehicles in an area it is the fastest way to bring down emissions.

As more cities introduce clean air zones, it has become confusing for drivers. There are eight CAZs in England, some of which charge all vehicles, while others charge just buses and HGVs. There are also congestion charging zones, low emission zones and zero emissions zones that have been introduced in cities like London and Glasgow, with more under development.

What is the role of other authorities/agencies in air quality?

County councils and combined authorities do not hold direct duties on air quality like their districts and unitary councils, but they **do have duties as 'air quality partners'** to engage with measures to improve air quality. County councils are the Highways Authorities, responsible for the local roads network and for public transport, and they also carry out Trading Standards functions. Some combined authorities are the integrated transport authority for the region, giving them a key role in wider planning for local transport, including walking, cycling and public transport. National bodies can also be air quality partners – these are specifically the **Environment Agency** which has a wide remit on environmental protection, particularly regulating industry, and **National Highways**, which manages the strategic roads network. National Highways are an important partner since major roads can feed traffic into local areas, and can therefore be a significant contributor to NO₂ and particulate pollution.

Neighbouring local authorities also have a duty to act if asked by a local authority preparing an air quality action plan. As a result of this, there are various air quality partnerships that have been formed by proactive local authorities and combined authorities to work together to deliver clean air.

WHAT SHOULD CAMPAIGNERS CALL FOR??

Local authorities have powers to improve air quality, particularly through transport or planning interventions. A lack of action by local authorities tends to be due to insufficient funding, other priorities over-riding clean air targets, or concerns about political opposition and public acceptance of proposed interventions. Campaign organisations can play an important role in pushing for bolder action, and it is useful to know what is within the powers of the local authority to act on.

Strategic interventions and ambitious targets

Councils should set and communicate ambitious targets for improving air quality in their areas. Those councils that are leading the way have usually made air quality a strategic priority and have air quality fully integrated across council operations, helping to break down siloed thinking and ensuring effective implementation and monitoring. These are generally long-term plans, but there are several actions you can push your council to adopt.

- Local authorities should adopt WHO guidelines as air quality targets and develop credible plans and pathways for how to reach them. Targets should be drawn up through meaningful engagement with the public, businesses, and local partners, including advocacy organisations, to ensure the council has buy-in and a mandate for action.

When drawing up plans for how to reach these targets, councils should consider the long-term ambitions of communities and engage people who are most affected by air pollution, and people and businesses that are likely to be most impacted by any measures introduced to improve air quality. This is key for action aiming to provide attractive options for people to travel by cleaner, healthier modes of transport.

- Local transport plans should have an explicit aim to reduce reliance on cars and should prioritise walking, wheeling, cycling and public transport, whilst ensuring these measures are convenient for local people. People should be effectively engaged in the design of the solutions provided.

Short-term interventions

There are a number of lower cost transport interventions that local authorities could deliver under their existing transport powers. Alone, these interventions will not be enough to reduce air pollution to within WHO guidelines but implementing these policies in a targeted way can deliver measurable local benefits. For example, school streets provide a reduction in air pollution around schools, whilst also encouraging active travel, and send a clear message that air quality is a priority. There is a role for campaign and advocacy organisations to push local authorities to adopt and implement these.

Road reallocation

- Local authorities can enforce school streets⁴ through powers⁵ that allow them to restrict traffic in certain areas, streets or times. These powers can also be used to reallocate road space for active travel. Campaigners should encourage local authorities to implement school streets wherever possible, and to create safe and pleasant routes to school to make it possible for more children to walk, cycle or scoot.
- Under the Traffic Management Act 2004,⁶ local authorities can improve bus services, without needing to invest in a whole new bus fleet or routes, by ensuring bus lanes are free flowing with no parking. This should help encourage people to take the bus.
- Councils should consider regularly closing high streets to boost walking, wheeling and cycling and promote local businesses (for example car free Sundays, or a car free day once a month). To provide reassurance for local businesses, the car free days could be combined with differing rules on pavement licencing⁷.
- Councils should have a target for green infrastructure,⁸ including tree cover targets, which should be part of a road reallocation, rather than on pavements where they can impede passage by wheelchair users or buggies.

Leading the way

- Local authorities should show the community how the council is reducing its own emissions, for example through electrifying its fleets and working with local operators to electrify local buses.

Communication and engagement with the public and businesses

- Better, real-time, monitoring, and transparent communication of air pollution will help communicate the need for action and support more meaningful engagement with the public. This might include providing opportunities for co-design of interventions with residents or community groups.
- Councils can mobilise businesses to take action through supporting them to make different choices. For example, Leeds City Council give businesses the opportunity to lease out electric vans for free for two months to try them first (Leeds 2020).

⁴ School streets are the temporary restriction of motorised traffic on a road outside a school at school drop-off and pick-up times. They can be enforced physically, with temporary bollards and people standing in the street, or with automatic number plate recognition (ANPR) cameras.

⁵ Powers for school streets granted under the Section 1 of the Road Traffic Regulation Act 1984 (sections 6–9 in London) and Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996.

⁶ In October 2022, part 6 of Traffic Management Act 2004 was amended under updated regulations to use civil enforcement of bus lanes and moving traffic contraventions.

⁷ Pavement licencing was amended during Covid-19 under the Business & Planning Act 2020 and Highways Act 1980 and there is a plan to extend this in the Levelling Up and Regeneration Bill (DLUHC 2022).

⁸ Green infrastructure refers to natural features (for example trees, rivers, or other green space and waterways) that work together to deliver multiple benefits, for example improved drainage. It can be delivered under the Highways Act 1980.

ENGAGING WITH AIR QUALITY

Campaigning and advocacy organisations play an important role in pushing for bolder action on clean air. They form part of the ‘ecosystem of influence’ and cultivate connections across and between groups, both important parts of effective movements (Laybourn-Langton 2021) In the context of working with local authorities, campaigning and advocacy groups have two roles.

The first is to **directly engage with the council**, in both a scrutiny role to hold the council to account and, equally important, a supportive role to voice support for measures the council is introducing. Councillors we spoke to said they often only hear loud protests from those opposed to measures (particularly when trying to reduce traffic emissions) and don’t hear positive messages of support which can help them take bold action.

The second role is to use their strong relationships with the communities they work in to help people **identify problems and devise solutions** to improve air quality and engage with what a future with clean air might look like. This kind of work can help make sure schemes the council is proposing work practically and fairly for local people and do not have unintended consequences. Building alliances with other organisations (businesses, schools, other advocacy organisations, etc) as part of imagining the future of local neighbourhoods and high streets can strengthen arguments for interventions.

The council has a duty to publish information on air quality that is accessible and available to the public. This includes the following:

- The council’s annual status reports. These should contain the targets the council has committed to, actions they are taking, whether these are funded, and whether they are on track to meet them, along with recent air quality data.
- Some councils have daily information on air quality and pollution where you can register for alerts.
- Maps or postcodes of the smoke control areas where emitting smoke from chimneys is illegal, and only certain types of fuel can be burnt, for example, the Ready to Burn standard.
- If the council has an air quality action plan or strategy, this should be publicly available. It is worth familiarising yourself with it and asking some of the following questions: How does the council plan for new development without making air quality worse? How is the council going to tackle hot spots of pollution? How long have air quality management areas been in place? Are there emerging sources of pollution the council has plans to tackle?
- The joint strategic needs assessment produced by the council’s director of public health might outline health impacts in your area.

WHO SHOULD YOU TALK TO?

For campaigners or advocates, particularly those new to working in air quality, it can be overwhelming to identify who to talk to, or what information you should have access to. The following are a useful starting point:

In the councillor polling that we carried out, 61 per cent thought that their constituents did not think that air pollution was a problem in their area, and only 39 per cent felt that people would be more likely to vote for a party that would tackle air pollution. There is an important role in making sure your voices are heard through engaging with the council.

- Contact your local councillor, let them know what you want to see and what your concerns are.
- Identify which cabinet member is responsible for air quality, and contact them too. The role might sit under the same remit as climate change, wellbeing or public health.
- Find out who your local council's air quality partners are, and what they have in place to take action. This could be the highways and transport department in a county council, or the strategic transport team at a combined authority.
- If, in the process of getting to know the local council, you identify areas where the local authority is not as transparent or clear as they could be, or you cannot find who is responsible for air pollution, the next step should be engaging directly with your ward councillor or environmental health or environmental protection team to try and find this information.
- Hold local councillors to account, but also celebrate/champion successes, and see things through, for example through being involved in co-designing interventions and responding to consultations.

Beyond the local council, engaging more widely in clean air action is essential. Local authorities are limited by a lack of funding and support at a national level, so putting pressure on national government to take the lead and champion urgent action on clean air is key. Write to or email your member of parliament about this. It is worth remembering that effective action on air quality will require a wide range of different interventions, from transport initiatives to changes to the planning system.

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