



STRATEGIC AVIATION SPECIAL INTEREST GROUP
of the Local Government Association

ITEM 6: SASIG RESPONSE TO DEFRA CONSULTATION ON 'DRAFT LOCAL AIR QUALITY MANAGEMENT GUIDANCE' FOR LOCAL AUTHORITIES

Summary

Please see **Annex A** (pg.2) for the response submitted on 26 September 2008 by SASIG to the Department for Environment, Food and Rural Affairs (Defra) consultation on 'Draft Local Air Quality Management Guidance' for Local Authorities.

Recommendation

That the report be noted.

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SASIG RESPONSE TO DEFRA CONSULTATION ON 'DRAFT LOCAL AIR QUALITY MANAGEMENT GUIDANCE' FOR LOCAL AUTHORITIES

Introduction

The Strategic Aviation Special Interest Group (SASIG) is part of the Local Government Association (LGA) with a membership of 54 Local Authorities representing 14 million people, or approximately a quarter of the UK population.

SASIG seeks to ensure that any national aviation strategy for the UK is implemented through regional planning guidance and other planning processes so as to reconcile economic, social and environmental issues in a sustainable way.

Summary

- 1 This report is SASIG's response to the Department for Environment, Food and Rural Affairs (Defra) consultation on 'Draft Local Air Quality Management Guidance' for Local Authorities.
- 2 The consultation document includes sections on tackling aviation-related air pollution, but makes it clear that those Local Authorities with airports within their boundaries will have to use measures such as Local Transport Plans and traffic planning to provide for better air quality around airports.
- 3 SASIG's key recommendations are:
 - **Requirement for integrated pollution control:-**
Aviation-related emissions should be brought under the same review and assessment process as that carried out by Local Authorities for other air pollution sources. Local Authorities' powers to enact the solutions required for tackling local air quality must also be strengthened, irrespective of the source of air pollution.
 - **Inclusion of NOx controls:-**
The requirement that airports operate in excess of 10 mppa (million passengers per annum) before Detailed Assessment is necessary should be removed.
 - **Inclusion of PM₁₀ controls:-**
The requirement to measure PM₁₀ particulate matter should not be removed.
 - **Data collection requirements:-**
The metrics to be used for data collection differ from those routinely used, which is likely to place an unnecessary burden on Local Authority resources.
 - **Setting of priorities according to local need:-**
Local Authorities should continue to set priorities according to local need, even if this means going beyond their statutory role in local air quality management, as urged by Defra in the consultation document.
 - **Lessons to learn:-**
The recommendations from the 2007 evaluation of local air quality

management carried out by Defra and the Devolved Administrations should be incorporated into this guidance.

Introduction

- 4 The consultation involves revising the 2003 Policy Guidance (England only) and Technical Guidance (UK-wide) on local air quality management.
- 5 There are also four new Practice Guidance documents covering England. These documents point the way to practical measures and powers that Local Authorities already have to implement improvements, including methods of economically appraising such measures.
- 6 The consultation document includes sections on tackling aviation-related air pollution, but makes it clear that those Local Authorities with airports within their boundaries will have to use measures such as Local Transport Plans and traffic planning to provide for better air quality around airports.
- 7 Defra and the Devolved Administrations undertook an evaluation¹ (Feb. 2007) of the support provided by the Government to Local Authorities for air quality action planning through local air quality management. It is apparent that not all of the key recommendations resulting from that evaluation have been incorporated into guidance for air quality management.

Requirement for integrated pollution control

- 8 The mention of airports in the consultation document, other than the paragraph below, is very brief. This is because, as stated in the document, Local Authorities have very limited powers in this area. Local Authorities are not expected to control pollution from airports, but to accept the resulting increased levels, leaving it to airport operators to reduce their pollution, whilst retaining control of other industries, as suggested in paragraph 5.37 of the consultation.

"Airports: 5.37

Although local authorities cannot directly control emissions from airports, local authorities can use their powers to reduce traffic flow around an airport, or encourage the use of public transport to and from airports. Local travel plans can include measures to reduce car dependency, and can be utilised by local authorities, businesses, schools, hospitals and other organisations. See www.dft.gov.uk/pgr/sustainable/travelplans/."

SASIG comment:-

- 9 This advice represents an inequitable situation and a lack of strategic guidance for local government. Other local industries are required to manage and reduce their pollution levels and should not be penalised further to compensate for airport-related pollution. This may result in a reduction of output or competitiveness. Responsibility for dealing with pollution should rest with the industry producing the pollution. Local Authorities should not be expected to enforce progressively stricter controls on other industries as a result of a lack of centralised guidance or controls embracing airport-related emissions.

¹ 'Evaluation of Local Authority Air Quality Action Planning', Feb. 2007, Defra & the Devolved Administrations.

- 10 What is required is a management regime that takes as its baseline the pollution level without the airport, and then implements measures to control/reduce the pollution, in line with environmental health requirements. Once this has been achieved, future plans for airport growth should not upset the baseline control level.
- 11 This type of planning is necessary to ensure that air quality improvements achieved by Local Authority initiatives are not undone by the Department for Transport agreeing to airport growth. Decisions on airport management must be better integrated with other actions being implemented by Local Authorities, ensuring equitable treatment.
- 12 Local Authorities' powers to enact the solutions required for tackling local air quality must also be strengthened, irrespective of the source of air pollution. Following designation of an Air Quality Management Area (AQMA), all sectors that contribute to the air pollution in the AQMA must be required to participate in and provide funding for the measures defined by the affected Local Authorities as being necessary to manage and reduce the air pollution. This will require the coordination, and cooperation, of all affected parties, such as the Highways Agency, the Highway Authority, airport operators and all on-airport service providers, airline operators, the Office of the Rail Regulator, Network Rail, and all Local Authorities within whose boundaries the AQMA sits.
- 13 A key constraint identified in Defra's 2007 evaluation of local air quality management was that Local Authorities' programmes of rolling reductions are unlikely to be effective where external organisations do not support joint-working on such initiatives.² This is clear evidence of the need for all parties to collaborate and participate in air quality management.
- 14 There is also a need to coordinate timescales for programmes, in order to adequately provide for aspirations to monitor and manage air quality. For instance, Local Transport Plans (LTP) cover periods of 4-5 years, setting out the actions and allocating funding for the schemes to be implemented over the life of the plan. This leaves little scope for the incorporation of further transport measures in relation to air quality, should their need arise within a period already covered by LTP provisions.
- 15 The concept of 'gateway thresholds' should be employed such that acceptable air quality is achieved prior to development proposals affecting air quality being considered.

Inclusion of NOx controls

- 16 Box 5.4 included in the Technical Guidance (page 5-20) says that at airports where the passenger and freight (freight being converted to a passenger equivalent) movements are below 10 mppa (million passengers per year), a Detailed Assessment³ is not needed unless the existing NOx concentration is above 25 ug/m³.

² 'Evaluation of Local Authority Air Quality Action Planning', Feb. 2007, Defra & the Devolved Administrations; section 6.2 'Consultation and Joint-Working'.

³ Detailed Assessment is step two of the review and assessment procedure for air quality, and is required where an authority identifies a risk that an air quality objective will be exceeded at a relevant location.

SASIG comment:-

- 17 The proposed threshold of 10 mppa should be removed, leaving solely the NO_x threshold of 25 ug/m³ as the trigger for a Detailed Assessment.

Inclusion of PM₁₀ controls

- 18 Box 5.4 included in the Technical Guidance (page 5-20) also includes a proposal to remove the requirement to measure PM₁₀ particulate matter.

SASIG comment:-

- 19 This proposal seems to be incompatible with the overarching public health aims of air quality management. If air quality strategies are to achieve exposure reduction, careful monitoring of all sources is required.
- 20 There are human health impacts of even small increases in particulate matter. Consistent monitoring is required in order for the appropriate action to be taken to reduce negative health impacts. Measurement of PM₁₀ should be retained as a public health consideration.

Data collection requirements

- 21 As already indicated, with regard to aviation it is proposed that some requirements be removed; however, the overall data collection metrics differ from those routinely used.

SASIG comment:-

- 22 SASIG understands that there are concerns about the metrics required differing from those routinely used. This will require data collection resources in excess of those already employed in air quality management, and therefore appear to constitute an unnecessary additional burden on Local Authorities.
- 23 This runs contrary to recurring elements in the recommendations from Defra's 2007 evaluation of air quality management – that data collection must be adequately resourced, not over-burdensome, and integrated into the process.

Local Authorities to set priorities according to local need

- 24 The 'Introduction' to the consultation document states that: "Local Authorities are at the forefront of public service, and should continue to set priorities according to local need, even if this means going beyond their statutory role in local air quality management".

SASIG comment:-

- 25 Recognition of Local Authorities being at the forefront of public service is welcomed.
- 26 Despite the relaxation proposed in this guidance of the already light-touch involvement of aviation-related emissions in the local air quality management regime, the window of opportunity provided by Defra's statement above will be a valuable route through which Local Authorities can apply a consistent approach to air quality management.
- 27 Improved strategic policy is required to ensure that the capacity increases envisaged by the 2003 Air Transport White Paper can be met without adverse impacts on local air quality.

Conclusions

- 28 There is a need for air quality control mechanisms to apply on an equitable basis to all industrial sources including airports. Similarly, any industrial operations must be assessed in terms of their full interaction with local conditions.
- 29 It is understood that the aviation industry is taking steps to meet air quality limits, however, whilst those actions continue in isolation from the actions of other sectors, gains achieved by reductions from other sources could be absorbed by increases from aviation. The end result, therefore, is no net reduction in emissions and inequity in terms of commercial interests and public health protection.
- 30 The consultation document repeatedly emphasises the need for coordination of and integration with other policies, departments, organisations and priorities. This aim will be compromised whilst aviation remains outside the air quality management regime applied to all other sectors.

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