

Twenty-second Report of Session 2022-23

Department for Environment, Food & Rural Affairs and Department for Transport (Joint Air Quality Unit)

Tackling local air quality breaches

Introduction from the Committee

The UK has legal air quality limits for major pollutants at a local and national level. The UK complied with most of these legal limits between 2010 and 2019 with the exception of the nitrogen dioxide (NO₂) annual mean concentration limit, for which there have been longstanding breaches. The Department for Environment, Food & Rural Affairs (Defra) and the Department for Transport (DfT) have established the Joint Air Quality Unit (JAQU) to oversee delivery of government's plans to achieve compliance with air quality targets.

Measures to tackle NO₂ pollution include bus retrofit and traffic management schemes, and in some areas, Clean Air Zones (CAZs) where vehicle owners are required to pay a charge if their vehicle does not meet a certain emissions standard. The government has, through its NO₂ programme, directed 64 local authorities to take action to improve air quality. It has also commissioned National Highways to examine breaches on the Strategic Road Network in England. As at May 2022, a lifetime budget of £883 million has been committed to the Programme to support local authorities. Separately government has spent £39 million to improve air quality on the Strategic Road Network from 2015–16 to 2019–20.

Government published a Clean Air Strategy in January 2019 outlining its approach to air quality more broadly. At the time we took evidence government expected to publish an update of its National Air Pollution Control Programme in September 2022 to set out the measures that will be required for the UK to meet its 2030 national emissions limits.

Based on a report by the National Audit Office, the Committee took evidence on Monday 27 June 2022 from the Department for Environment, Food & Rural Affairs and Department for Transport (Joint Air Quality Unit). The Committee published its report on 26 October 2022. This is the government's response to the Committee's report.

Relevant reports

- NAO report: [Tackling local breaches of air quality](#) – Session 2022-23 (HC 66)
- PAC report: [Tackling local air quality breaches](#) – Session 2022-23 (HC 37)

Government response to the Committee

1. PAC conclusion: It is far too difficult for the public to find information about the air quality in their local area and what is being done about it.

1. PAC recommendation: The government should, as part of its Treasury Minute response, set out a timetable for improving the accessibility of public information about local air quality. This should include making it easy for people to find out if they live near a site that breaches legal air quality limits, and if so, what progress is being made on bringing it into compliance.

- 1.1 The government agrees with the Committee's recommendation.

Target implementation date: March 2025

1.2 The government recognises that more can be done to ensure that air quality information is effectively communicated to the public. That is why in December 2021 the government launched a comprehensive Air Quality Information System ([AQIS](#)) Review to ensure members of the public, and vulnerable groups, have what they need to protect themselves and understand their impact on air quality.

1.3 The review aims to provide clear, actionable recommendations on the changes that need to be made to the present system to better meet the diverse needs of users. This includes how pollution forecasts and alerts are delivered, how advice to vulnerable groups is enhanced, and improving access to local information. No one solution will meet the needs of all groups, and the department will need to properly assess all their needs and consider the solutions required to meet them.

1.4 Outcomes from the review will be published on [UK-AIR](#), with a final report in early 2024. Alongside this review a major overhaul of the UK-Air website and other Air Quality Web services is underway. This will deliver a simplified holistic service for all users. The government's aim is to complete the whole web system review and have a clear vision for future web service provision by March 2025, with improvements being made in the interim.

1.5 National Highways have engaged with local authorities and local MPs in areas where there are roads with no measures to bring forward compliance. The Joint Air Quality Unit is working with local authorities and National Highways to consider how best to ensure this information is made available via their established public engagement channels.

2. PAC conclusion: There is a high level of uncertainty in government's model for assessing pollution levels, which may mean that further areas of poor air quality might be missed by the programme.

2. PAC recommendation: As part of the Treasury Minute response, the government should set out how it will satisfy itself that all areas in exceedance of pollution limits have been identified and included in the programme, taking into account the high levels of uncertainty associated with the national model.

2.1 The government agrees with the Committee's recommendation

Recommendation implemented

2.2 The government is satisfied that the best available evidence that meets the stringent requirements for assessing compliance with the annual mean Nitrogen Dioxide (NO₂) limit value under the Air Quality Standards Regulations (2010) (AQSR) has been used to identify areas in exceedance and bring them into the programme.

2.3 An uncertainty of around +/-30% is not unusual for a model of this scale and complexity, and assessments have demonstrated that the national model meets the uncertainty requirements for assessing compliance under the AQSR. The government continues to work with external experts to identify and implement further targeted improvements to the national model to ensure it uses the best available evidence and reflects the impact of local measures. The government has also set up a new monitoring network which has greatly increased the number of locations where compliance with NO₂ limits is assessed using measurements. This network is achieving lower levels of uncertainty (<15%) and has more than tripled the number of roadside measurements used in the NO₂ compliance assessment. Since both modelled and measured values contain uncertainties, the government cannot definitively guarantee that all areas of exceedance have been identified.

2.4 Where local authorities' air quality monitoring identifies a potential NO₂ breach, they can share this evidence with the Joint Air Quality Unit. Whether a locally identified breach should be tackled through the NO₂ programme or through the Local Air Quality Management (LAQM) regime will depend on whether the monitoring data meets the specific siting and data quality requirements of the AQSR.

3. PAC conclusion: Central government has not always got the balance right in how it works in partnership with local government, having been prescriptive in some respects, while seeming to avoid responsibilities that naturally sit at a national level in others

3a. PAC recommendation: The government should review its approach to working with local authorities on air quality, to make it a more effective partnership. In particular, it should:

- **introduce a national communications campaign on air quality to provide a strong national message about the purpose of air quality measures that supports locally-tailored communications.**

3.1 The government disagrees with the Committee's recommendation.

3.2 Local authorities are important partners in delivering better air quality for local communities. The Department for the Environment, Food and Rural Affairs and the Department for Transport already engage regularly and constructively with local authorities. Local authorities are best placed to tailor communications to communities. This year, through our air quality grant, nearly £6 million was awarded to local authorities across 29 projects that include actions to improve public awareness of air pollution.

3.3 The government recognises that more can be done to ensure that air quality information is effectively communicated to the public. That is why the government launched a comprehensive Air Quality Information System ([AQIS](#)) Review. Outcomes from the review will be published on [UK-AIR](#), with a final report in early 2024. This includes how government can support local authorities in communicating local air quality information.

3.4 The government has funded Global Action Plan (GAP) to deliver Clean Air Day since its inception in 2017 and will continue to work closely with GAP and other stakeholders to improve public awareness of air quality issues.

3.5 The government has taken a strong lead in helping local authorities communicate about Clean Air Zones including nearly £3 million support for marketing. Evaluation has shown high levels of awareness and understanding of Clean Air Zones across multiple local authorities following their communication. It is the government's view that local authorities are best placed to deliver these communications. The government therefore is not persuaded that a national communications campaign is necessary to supplement this.

3b. PAC recommendation: The government should review its approach to working with local authorities on air quality, to make it a more effective partnership. In particular, it should:

- **Ensure that local authorities have sufficient flexibility to determine the approach to be taken in their local area. In addition, government should provide a further update to the committee by the end of this year outlining what further steps are being taken to improve its working relationship with local authorities.**

3.6 The government agrees with the Committee's recommendation

Target implementation date: February 2023

3.7 The government agrees that local authorities are best placed to determine the approach in their area in consultation with their local communities.

3.8 Under the NO₂ programme, local authorities are responsible for developing their own Clean Air Plans. Throughout plan development, local authorities are supported by a dedicated account manager. Following a Clean Air Zone launch, the government carries out lessons learned exercises which include seeking feedback on the joint working relationship.

3.9 For the government to assure itself it is meeting its obligation to ensure NO₂ compliance in the shortest possible time, local authorities are required to benchmark their proposals against the delivery of a Clean Air Zone. Each local authority has the flexibility to identify measures other than Clean Air Zones; indeed, the Clean Air Zone Framework is clear that non-charging measures should be preferred if they will deliver compliance as quickly as charging.

3.10 Under the Local Air Quality Management (LAQM) requirements, the government also provides support to local authorities in carrying out their LAQM duties through a dedicated helpdesk and statutory policy and technical guidance. This provides a clear steer for local authorities while allowing them to determine the measures they take and how they communicate in line with local priorities.

3.11 Following the strengthening of the LAQM and Smoke Control Area framework through the Environment Act 2021, officials are currently developing a programme of engagement with local authorities.

3.12 The government will write to the Committee by the end of February 2023 with a further update on how it is engaging with local authorities.

4. PAC conclusion: Although calculating an exact figure may be difficult, with Departments claiming it would be a great deal of effort to produce something not necessarily precise, Government could do more to improve the transparency of cross-government public spending that has an impact on air pollution.

4. PAC recommendation: Although calculating an exact level of spend on air quality across government may be too difficult, there is value in improving transparency through higher level estimates. Government should, by the end of the year, develop options for improving the transparency of cross-government air quality spend and inform the Committee of its preferred approach.

4.1 The government disagrees with the Committee's recommendation

4.2 The government holds robust information on spend for its two air quality programmes: the Air Quality and Industrial Emissions Programme (Defra) and the Joint Air Quality Unit (Defra/DfT).

4.3 Whilst the department holds overall strategic responsibility for the development and implementation of air quality policy, the levers which affect air pollution are varied, complex and sit across government.

4.4 The department works closely with other government departments to manage interdependencies and maximise co-benefits of policies that affect air pollution. Where it is beneficial, the government sees the value in making one-off estimates of the cross-cutting economic impacts of policies that impact air pollution. For example, the department has

estimated that air quality co-benefits of policies and measures to meet Carbon Budget 6 and Net Zero to be about £35 billion over 2020-2050.

4.5 However, a wide and diverse range of complex policies across government affect air quality, including transport decarbonisation, active travel, increased use of renewable energy sources, planning regulations, and sustainable food production practices.

4.6 The government cannot justify the disproportionate level of resource required to disaggregate the amount of spend driving air quality benefits for each of these policies. Due to the complexities surrounding the associated measures, any estimates produced would likely have large uncertainties, making them misleading and therefore unsupportive of greater accountability and transparency regarding government spending.

5. PAC conclusion: Government is not yet taking a sufficiently integrated approach to tackling the problem of poor air quality.

5. PAC recommendation: The update to the National Air Pollution Control Programme should set out how government will ensure full integration between the different areas of responsibility with an impact on air quality.

5.1 The government agrees with the Committee's recommendation

Recommendation implemented

5.2 The government has consulted on a revised National Air Pollution Control Programme (NAPCP) which includes robust actionable measures for further consideration to deliver compliance with the 2030 targets for all air pollutants. Responses to the consultation are currently being carefully considered. Strong governance arrangements regarding Air Quality policies are already in place.

5.3 The draft revised NAPCP sets out wide-ranging policies and measures to be considered further to drive emission reductions across to meet the 2030 emission reduction ceilings for five key pollutants. These sectors include domestic combustion, industry, agriculture and transport. It is based on analysis that includes estimates of pollutant emissions reductions of existing decarbonisation policies as well as air pollution measures.

5.4 The responsibility for these measures rests with different departments across government. As the NAPCP is UK wide, the government has also included measures which are the responsibility of Scottish Government, Welsh Government and the Northern Ireland Executive.

5.5 In particular, the government took an integrated approach by making sure DfT and the Department for Business, Energy and Industrial Strategy (BEIS) work closely together. Policies and proposals relating to road transport and decarbonisation have been considered from the following strategies:

- the Net Zero Strategy (HM Government)
- the Reducing Car Use for a healthier, fairer and Greener Scotland
- the Clean Air plan for Wales and the Net Zero Wales: Carbon budget 2

5.6 The draft revised NAPCP was subject to a [six-week consultation, that ran from 25 July to 4 September 2022](#). All consultation responses are currently being carefully considered.

6. PAC conclusion: There is a lot resting on the updated plan that government expects to publish if 2030 air quality targets are to be met.

6. PAC recommendation: The government must ensure that the plan it publishes includes robust, actionable measures that will result in compliance with the 2030 targets for all air pollutants, and ensure it has strong governance arrangements to monitor progress against its plan and take decisive action if progress falls behind expectations.

6.1 The government agrees with the Committee's recommendation

Recommendation implemented

6.2 The government has consulted on a revised National Air Pollution Control Programme (NAPCP) which includes robust actionable measures for further consideration to deliver compliance with the 2030 targets for all air pollutants. Responses to the consultation are currently being carefully considered. Strong governance arrangements regarding Air Quality policies are already in place.

6.3 The draft revised NAPCP outlines a list of wide-ranging policies and measures to be considered further to drive emission reductions across several sectors including domestic combustion, industry, agriculture and transport. The policies and measures which could be considered further included those from HM Government, Scottish Government, Welsh Government and the Northern Ireland Executive. The department also worked closely with other government departments (OGDs) when preparing the draft revised NAPCP, specifically DfT and BEIS whose areas of responsibilities have an impact on air quality.

6.4 Progress against the NAPCP is monitored monthly using an internal management system called Enterprise Project Management Office (EPMO). Progress reports are then subject to robust governance through the Air Quality Programme Board with escalation to Environmental Quality Portfolio Board. Wider oversight of the NAPCP programme is also aided by two key existing governance groups. The Air Quality Common Framework, which brings together officials from the Department for the Environment, Food and Rural Affairs, Northern Ireland, Welsh Government and Scottish Government. Separately there is the Cross Whitehall Group which brings together officials from several different UK government departments, including Defra, DfT, BEIS, and others.