

REPORT TITLE: AIR QUALITY STRATEGY

13 MARCH 2025

REPORT OF CABINET MEMBER: Cllr Porter Cabinet Member Place and Local Plan

Contact Officer: David Ingram Tel No: 01962 848479

Email dingram@winchester.gov.uk

WARD(S): ALL

PURPOSE

In November of 2003, the Council declared an Air Quality Management Area (AQMA) which covers Winchester City Centre. This AQMA, has been subject to a series of 5 yearly Air Quality Action Plans (AQAP), the latest of which was adopted in 2017 (CAB2906) which set out a series of 9 actions intended to improve air quality within the AQMA.

Over recent years there has been a steady improvement in air quality within the City, with the 'Annual Status Reports' required by Department for Environment, Food and Rural Affairs (DEFRA), reporting compliance with national levels for both particulates and Nitrogen Dioxides, since 2015 and 2020 respectively. Although the 5 year term for the current AQAP elapsed in 2022, due to current levels of compliance, DEFRA have allowed Winchester an additional period of assessment in expectation that Winchester will be in a position to revoke its AQMA in the Spring of 2025 and importantly that it will commence the adoption of a new 'Air Quality Strategy' (AQS) to press for further improvements in air quality for the district, in line with the government's national Air Quality Strategy for England.

This Paper sets out the background to Winchester City Council's new Air Quality Strategy and asks for Cabinet approval for its adoption and delivery over the next 5 years.

RECOMMENDATION:

1. That Cabinet approves the adoption of the proposed Air Quality Strategy 2025 – 2030 as set out in Appendix 1.
2. That the Corporate Head of Service – Regulatory, be given delegated powers to make minor amendments to the Air Quality Strategy 2025 – 2030 as necessary.

IMPLICATIONS:

1 COUNCIL PLAN OUTCOME

- 1.1 Greener, Faster
- 1.2 The adoption of a new Air Quality Strategy (“AQS”) not only meets with the Governments [Air Quality Strategy for England](#), many of its actions also present the added benefit of reducing Carbon emissions and are therefore in step with the Council’s aspirations to tackle the Climate Emergency. This includes the provision of a publicly accessible electric vehicle charging network across the district and a policy to phase out the use of internal combustion engine vehicles as part of its operational fleet, in favour of electric alternatives.
- 1.3 Thriving Places
- 1.4 In adopting this new AQS, the Council will be clearly setting out its aspirations to promote a healthy, desirable place to live and work, which will encourage the development of business and in turn support a vibrant local economy.
- 1.5 Healthy Communities
- 1.6 The Chief Medical Officer’s (Professor Chris Whitty) Annual Report 2022 on Air Pollution highlights the effects of air pollution on health and shows that whilst there has been an overall reduction in air pollution in the last 40 years, emissions of PM2.5 have remained static over the last decade and require further attention.
- 1.7 Good Homes for All
- 1.8 The Strategy seeks to develop a policy to improve indoor air quality, which has been recognised as a key driver of public health. In seeking to improve indoor air quality, the Council will be raising housing quality standards and therefore improving the quality of life of across its housing stock, for its citizens. This includes the retrofitting programmes for the Council’s Housing stock to make them more energy efficient and a policy of phasing out solid fuel burning in the Council’s own housing stock.
- 1.9 Efficient and Effective
- 1.10 Air quality continually ranks as a priority matter of concern for local residents who expect the Council to promote actions which seek to further improve air quality for its residents.
- 1.11 Listening and Learning
- 1.12 The AQS was subject to the detailed consideration of the cross party Air Quality Steering Group, chaired by the Portfolio Holder for Place and Local Plan, and their input was used to inform the AQS which was then subject to a

two month public consultation conducted in the late summer of 2024. The public's comments have been considered and where deemed appropriate the AQS amended, for Cabinet's consideration.

2 FINANCIAL IMPLICATIONS

- 2.1 The adoption of this new AQS will commit the Council to undertaking further actions. Some of these actions will have an associated cost, with an existing baseline revenue budget of £30k available to support air quality actions. There are other existing budgets, such as climate emergency, where actions would be fed through the Carbon Neutrality Delivery Group. It is also likely there will be actions to be delivered by other stakeholders, such as HCC.
- 2.2 Those actions which may necessitate additional funding will themselves be subject to a separate project delivery plan and will need to be fully costed, subject to individual risk assessment and stakeholder consultation.

3 LEGAL AND PROCUREMENT IMPLICATIONS

- 3.1 Since the implementation of Part IV of the Environment Act 1995 all local authorities have been under a duty to review air quality within their district. This involves measuring air pollution and trying to predict how it will change in the coming years.
- 3.2 The current national legal objectives that have to be met are set out in The Air Quality Standards Regulations 2010. It is a requirement that each local authority conducts a formal staged review of air quality within its district in accordance with a comprehensive set of guidance documents. These 'Annual Status Reports' (ASR) are then sent to DEFRA each Spring, for their approval. Where compliance with such objectives is unlikely then the local authority has to declare and maintain an Air Quality Management Area (AQMA) and put together an attendant plan to improve the air quality, referred to as a local Air Quality Action Plan (AQAP).
- 3.3 Conversely where a Local Authority reports compliance with the national legal objectives for each pollutant for a period of 3 or more consecutive years, then DEFRA requires that the Council report such compliance in its ASR and make a case for revoking the AQMA.
- 3.4 Due to the effects of Covid, DEFRA required that for years 2020 and 2021, the air quality data obtained be treated with caution and could only be considered if there was a pattern of compliance for year 2019 and preceding years. Whilst Winchester could report such compliance in most areas of the AQMA, it was unable to do so for a length of Romsey Road. However, the Council has now been able to report compliance with the Nitrogen Dioxide annual mean standard of $40\mu\text{g}/\text{m}^3$ all areas of the AQMA for 2021, 2022, 2023, and for 2024. Although in the case of the latter, at the time of drafting this report, this was still subject to final ratification.

- 3.5 Since the adoption of the Council's 2017 AQAP, the Environment Act 2021 and The Environmental Targets (Fine Particulate Matter)(England) Regulations 2022 (2022 Regs) has placed a duty on central government to achieve two defined air quality targets for fine particulates known as PM_{2.5}.
- 3.6 In response to these new legal duties placed on central government, the government has in turn placed new requirements on Local Authorities, as set out in its new [Air Quality Strategy for England](#). This places an expectation on local authorities to support central government in delivering on the national standards by adopting and delivering on 'actions' to improve air quality locally.
- 3.7 Any procurement related to delivery of the AQS will be conducted in accordance with Contract Procedure Rules and the Procurement Act 2023 (PA23).

4 WORKFORCE IMPLICATIONS

- 4.1 There is an ongoing work stream associated with the delivery of an AQAP, with monitoring and review of emissions work already delivered by the Public Protection Service. The work on this new AQS itself has already been delivered from existing officer resource whilst existing budgets have procured the services of air quality consultants Ricardo, to assist in producing the AQS.
- 4.2 As stated above, the 'actions' as set out in the new AQS, will each be subject to its own project plan, which will draw on the time, skills, and expertise of officers from across the Council, and key stakeholders, partner organisations and consultancies.

5 PROPERTY AND ASSET IMPLICATIONS

- 5.1 None

6 CONSULTATION AND COMMUNICATION

- 6.1 This AQS was developed in close collaboration with the Council's Air Quality Steering Group (the "steering group"), chaired by Cllr Porter, Cabinet Member for Place and Local Plan. This steering group comprises of cross-party members, relevant Council officers and local stakeholders including Hampshire County Council, Winchester BID and WinAcc. A full list of steering group members can be found in Appendix 2.
- 6.2 The aspirational standards as set out in the AQS, were informed by the World Health Organisation's (WHO) [Air Quality Guideline Standards](#) which were discussed in detail before being agreed by the steering group. These standards are set out in tabular form in paragraph 11.15.
- 6.3 This position was reflected in the initial draft presented by Ricardo consultants to the steering group on 16 March 2024 from which feedback comments were accepted and some amendments made to the Strategy. Members will note

that the Strategy has a joint Foreword from Cllrs Porter and Cllr Learney in their respective Cabinet roles for Place, Local Plan and Climate Change.

- 6.4 The Air Quality Strategy was then subject to a 6 week stakeholder and public consultation, and an All Member briefing on 2nd October 2024, after which consultation comments have been considered by the Steering Group and any necessary amendments have been made to the AQS (Appendix 1) now being recommended for adoption.

7 ENVIRONMENTAL CONSIDERATIONS

- 7.1 Poor air quality has a detrimental effect on health, aggravating respiratory and cardiovascular conditions and it has been identified as a significant cause of premature deaths by Public Health England.
- 7.2 There are no adverse impacts expected from adopting the new Air Quality Strategy. In fact quite the reverse as its primary purpose is to deliver improvements to the district's air quality and to support the Government's legal duty to maintain compliance with the air quality standards required by both the Air Quality Standards Regulations 2010 and to deliver compliance with The Environmental Targets (Fine Particulate Matter)(England) Regulations 2022.
- 7.3 Although it focuses on improving public health, in seeking to improving the districts air quality, the new AQS also provides the added benefit of presenting a net environmental benefit of reducing carbon emissions and thereby supporting the natural environment.

8 PUBLIC SECTOR EQUALITY DUTY

- 8.1 The proposal is consistent with the Council Plan which has been subject to Equality Impact Assessment.
- 8.2 Although no specific impact assessment has been carried out for the Air Quality Strategy, the actions proposed by the strategy may present disproportionate impacts to the affected cohort of the community. The 2021 Census reports that Winchester's population is aging with the proportion of over 65s having increased by 2.1% from 18.7% in 2011. It is known that the long term cumulative effects of poor air quality exposure over a lifetime, increase the likelihood of pulmonary and cardiovascular conditions.
- 8.3 Designating the whole district as a Smoke Control Area, may affect some properties for whom solid fuel burning is their main source of heating, with the 2021 census identifying that across the district, 8.1% of properties have either oil, wood or solid fuel only heating sources. Such policy decisions will be given the full considerations during the feasibility study and consultation phase and will inform on whether adoption with caveated exemptions, is the right option.

8.4 Overall, the new AQS primary objective is to improve health outcomes and anticipated to benefit those suffering from long term pulmonary and cardiovascular conditions. In seeking to improve air quality impacts on sensitive receptors such as schools, the AQS also seeks to mitigate impacts on young people who may otherwise suffer from pulmonary conditions such as asthma.

9 DATA PROTECTION IMPACT ASSESSMENT

9.1 A DPIA was not considered necessary as only a limited amount of non-sensitive personal data is being collected. The data collected through the public consultation will be handled in compliance with the data protection legislation. A summary of the consultations comments can be found in Appendix 3 to this report.

10 RISK MANAGEMENT

10.1 The strategy itself seeks to sets out a series of intended actions that are expected to improve air quality. Some of these actions could present some reputational and or operational risk to the Council. Prior to any delivery, each action will need to be subject to its own risk assessment and the scrutiny of the steering group.

Risk	Mitigation	Opportunities
<p>Financial Exposure</p> <p>The AQS itself does not present a financial risk to the Council, because it sets out a commitment to explore the delivery of a series of actions, each of which will be subject to its own financial assessment.</p>	<p>Once the Air Quality Strategy has been adopted, each action will be subject to its own financial plan and risk assessment process.</p>	<p>In adopting the AQS and working with other stakeholders through a regional air quality network, this may provide additional opportunities to access central government grant funding and also engaging the resources of other stakeholders such as the academic sector. .</p>
<p>Exposure to challenge</p> <p>That the Air Quality Strategy may be subject to legal challenge based</p>	<p>The data shows that WHO interim Guideline levels of 30 µg/m³ annual</p>	<p>Opportunity to promote the Council's high aspirational air quality</p>

<p>on its aspiration to deliver WHO interim guidelines that are more stringent than the standards set by the national legal requirements.</p>	<p>mean for NO₂ are already being achieved in most parts of the district, with the exception of Romsey Road in Winchester.</p> <p>Similarly levels of 10 µg/m³ annual mean for PM_{2.5} are near compliance in most parts of the near district outside of the City.</p> <p>The Strategy is being proposed in support of central government's national Air Quality Strategy for England.</p>	<p>standards with a positive public health reason to live and work in the district.</p>
<p>Innovation</p> <p>The adoption of the Strategy may increase business costs which will discourage local business and innovation.</p>	<p>The Strategy supports the wider direction of approach through reducing emissions, which is broadly supported by local business.</p>	<p>The Council is at the forefront of air quality improvements through which it will proactively pursue a range of innovative methods to better monitor air quality and engage the public behavioural change.</p>
<p>Reputation</p> <p>The adoption of the strategy demonstrates that the Council is keen to support the delivery of clean air for its citizens and assist in the delivery of the national Air Quality Strategy. This presents a positive impact on the Council's reputation.</p>	<p>The strategy is being adopted in support of the government's own Air Quality Strategy Framework for Local Authority delivery policy. The Strategy is therefore justified by national policy.</p>	<p>To promote the Council's support for national policy by promoting public health driven actions, locally.</p>
<p>Achievement of outcome</p>		

<p>That the adoption of the Strategy does not meet its own objective standards by 2030.</p>	<p>This is a 5 year plan, which will be subject to constant review. The expected roll out of a more comprehensive air quality monitoring network, will also evidence whether these standards have been achieved and or whether additional actions should be considered.</p>	<p>In achieving these standards, we can demonstrate the delivery of enhanced Public Health improvements and the Council will be able to present a positive position on air quality and capitalise on exceeding national air quality standards.</p>
<p>Community Support</p> <p>The Air Quality Strategy has been widely consulted on.</p>	<p>Consultation was carried out as detailed in section 6 above. This included the input of the cross party Air Quality Steering Group a 6 week public consultation and an All Member briefing on 2nd October 2024.</p>	<p>To raise public awareness on the health impacts on poor air quality.</p> <p>Engage more in School and citizen science engagement.</p> <p>To develop better working relationships through a regional Air Quality Network for consistency on shared objective of improved air quality.</p>
<p>Timescales</p> <p>Target to deliver air quality targets by 2030 (10 years before national legal deadline set down by the 2022 Regs as being 31st December 2040).</p>	<p>Current Nitrogen Dioxide levels in the existing AQMA are either already compliant with or very close to the 30 µg/m³ standard and are already fully compliant in the wider district.</p> <p>Although current monitoring of PM_{2.5} is limited, officers are confident, based on</p>	<p>To continue the monitoring of Nitrogen Dioxide in the City and deployment of NOx tubes outside 'sensitive' locations i.e. Schools.</p> <p>Increase the deployment of low cost monitoring solutions for PM_{2.5} in the wider district as part of an</p>

	existing levels in Winchester that we are already near compliance with the 10 µg/m ³ annual mean standard in the wider district.	expansion of a better regional monitoring network.
Project capacity Demonstrate able to deliver on the actions set out within the Strategy.	To adopt an overall project plan that phases delivery over the 5 year life of the plan, to enable sufficient resource to be assigned to each projected action in turn. To deliver defined actions using good Project planning techniques that will identify resources required and realistic timescales on delivery.	To create task and finish groups that will provide opportunity to 'upskill' wider team members and colleagues to take on defined actions, outside of their usual scope of routine work.

11 SUPPORTING INFORMATION:

Background

- 11.1 In November 2003 the Council declared an Air Quality Management Area (AQMA) within Winchester city centre, in order to meet the requirements of Section 84 of the Environment Act 1995 and the associated Air Quality Standard Regulations 2010. The original Air Quality Action Plan (AQAP) setting out the actions intended to improve air quality to meet the regulatory standards, was adopted by the Council in 2006, with the latest AQAP approved in the Spring of 2017. Although not an absolute legal requirement, government policy is that AQAPs should be reviewed every 5 years.
- 11.2 In addition to having an AQAP in support of the AQMA, the Council is required to submit an 'Annual Status Report' setting out the previous year's air quality data, how the area's air quality has performed over time and the performance of the actions over the duration of the plan. Officers have diligently submitted to DEFRA, the Council's Annual Status Reports in June of each year which once accepted, are published on its website, [Air Quality Reports for Government - Winchester City Council](#).
- 11.3 Winchester's AQMA has reported a steady improvement in air quality over the last decade, with total compliance with particulate (PM₁₀) standards since 2015. It has also returned near total compliance with nitrogen dioxide (NO₂)

standards since 2019, with the exception of only marginal exceedances along a short section of Romsey Road.

- 11.4 In 2020 air quality was significantly improved by the unintended benefits from the Covid lockdown measures imposed by the government and since then, whilst there has been a rise in traffic, this has not returned to pre pandemic levels. This is in part due to the wider uptake in home working practices.
- 11.5 DEFRA's policy expects that where Local Authorities report a 10% or more confidence below the legal national air quality targets, for a period of 3 consecutive years or more, then they are encouraged to apply for a revocation of the AQMA, which must be approved by DEFRA. However, due to the impacts of the Covid Pandemic, DEFRA has urged caution on including the 2020 and 2021 as part of the 3 years assessment, unless the respective AQMA had previously reported compliance in 2019 and before. Winchester's AQMA did not report total compliance in 2019 and therefore the 2020 and 2021 compliant data returns cannot therefore be considered.
- 11.6 However, the ASR's for 2022 and 2023 have also returned a fully compliant data set in all areas within the AQMA for both particulate PM₁₀ and NO₂ meaning that these years can be considered. In view of this compliant trend DEFRA has indicated that Winchester is absolved from having to update its existing 2017 Air Quality Action Plan, pending the 2024 data return must also show compliance, after which it may consider any application for a revocation of the existing AQMA.
- 11.7 The 2024 data return has also shown continued compliance with the national standard, albeit at the time of drafting this report this data set was being ratified by an independent body. Notwithstanding, officers are nevertheless confident that the trend of compliance will be sustained.
- 11.8 In recognition of DEFRA's accommodating position, Officers have indicated to government that Winchester City Council is committed to adopting a new Air Quality Strategy which seeks to deliver improved air quality by 2030 in support of the government's [Air Quality Strategy for England](#).

Air Quality Strategy for England

- 11.9 In 2021, The Environment Act 2021 ('the Act'), was passed, which created a number of new legal frameworks, including the creation of new environmental targets, forming a new Office for Environmental Protection, matters of waste and resource efficiencies, water resource management and also the amendment of the Environment Act 1995, by placing a requirement on central government to adopt a new national Air Quality Strategy '*containing policies with respect to the assessment or management of the quality of air*'. It was required that this national Strategy be published within 12 months of the passing of the Act after which it must be reviewed every 5 years.
- 11.10 Critically, the Act also introduced Section 81A of Environment Act 1995 which places a duty on English Local Authorities to '*have regard to the strategy*

when exercising any function of a public nature that could affect the quality of air'. This means that the Council must consider the government's own national Air Quality Strategy when considering its own local authority air quality management functions or any other activity under its control which could have a direct or indirect impact on air quality in its area.

11.11 The Act also empowered the Secretary of State to make regulations with respect to the Act's air quality requirements. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 set out two national fine particulate PM_{2.5} air quality targets, as follows:

1. Annual Mean Concentration Target for PM_{2.5} must be equal to or less than 10 µg/m³ by 31st December 2040;
2. A population exposure reduction target where there is at least a 35% reduction in population exposure by the end of 31st December 2040 ("the target date"), as compared with the average population exposure in the three-year period from 1st January 2016 to 31st December 2018 ("the baseline period").

11.12 In supporting the delivery of these two national air quality targets, the national [Air Quality Strategy for England](#) places an expectation on all Local Authorities and states:

'All local authorities are expected to take proactive action to improve air quality, whether or not they have an Air Quality Management Area. Local authorities without an Air Quality Management Area, should specify proactive measures they will take in their Air Quality Strategy.'

And:

'Where a local authority is not required to declare an Air Quality Management Area they are expected to develop and publish a local Air Quality Strategy. The content of each strategy will be determined locally but should be produced in consultation with the director of public health and set out the steps the local authority will take to improve local air quality.'

Winchester City Council's Air Quality Strategy

11.13 The Council's new AQS, which is attached in Appendix 1, has been developed through a series of Air Quality Steering Group meetings. The steering group is a cross party and multi-stakeholder group, with its members drawn from relevant Council members, Officers and external bodies, the attendee details of which can be found in Appendix 2. This Group has met over many years and is the central decision-making body on matters of air quality for the Council.

11.14 In developing the Council's Air Quality Strategy, the Steering Group agreed to consider more ambitious and yet deliverable standards than those adopted by central government and in doing so took account of the updated World Health

Organization's Global Air Quality Guidelines, as updated in 2021. These set out aspirational guideline standards for air quality in various parameters, including nitrogen dioxide and particulates both PM₁₀ and PM_{2.5}, with interim targets, recognising that different countries have very different challenges when trying to achieve these standards.

- 11.15 The three World Health Organisation guideline pollutants relevant to Winchester and its AQS, are as follows:

Pollutant	Averaging time	Interim Target				AQG Level
		1	2	3	4	
Nitrogen Dioxide (NO₂ µg/m³)	Annual	40	30*	20	-	10
	24 Hour	120	50	-	-	25
Particulates (PM₁₀ µg/m³)	Annual	70	50	30	20	15
	24 Hour	150	100	75	50	45
Fine Particulates (PM_{2.5} µg/m³)	Annual	35	25	15	10*	5
	24 Hour	75	50	37.5	25	15

* Proposed AQS standard

- 11.16 In agreeing to the target standards in the AQS, the steering group wanted to be both ambitious and yet realistic, so that the targets set are deemed as being achievable within the 5 year term of the strategy i.e. by 2030.

Nitrogen Dioxide

- 11.17 The current national annual mean standard for NO₂ was unchanged by the 2021 Act and 2022 Regulations, so remains at 40 µg/m³. The district has for many years, consistently returned annual mean levels well below 30 µg/m³ within the wider rural areas. However, since 2020, Winchester's worse case 'hot spot', specifically along a short section of Romsey Road, has returned annual mean levels of at or around 33 µg/m³ (bias and distance corrected). The Air Quality Strategy therefore proposes an annual mean NO₂ target level of 30 µg/m³ in line with WHO Interim Target 2.
- 11.18 The WHO also sets a 24-hour guideline standard and interim targets. The nearest equivalent national standard, again prescribed in the 2010 Regs, sets an hourly standard of 200 µg/m³ not to be exceeded more than 18 times a calendar year. Since 2018, there have in fact been no exceedances of the 200 µg/m³ standard in either of the two real time monitoring locations. Officers also undertook a detailed analysis of the hourly data sets over the last 3 years, to extrapolate the 24 hour data equivalent in order to determine whether there had been any breaches of the WHO AQG24 hour standard.

There had been none. It was therefore agreed that in already being compliant with this standard, there was no merit in including it in the Council's strategy, noting that for transparency this parameter will still be reported as part of the Council's ASR to DEFRA.

Particulates

- 11.19 The current national annual mean standard for PM₁₀ again remains unchanged by the 2021 Act and 2022 Regs, so remains at 40 µg/m³. The Council has already reported compliance with this standard since 2015 and is consequently 'undeclared' on the need to report on PM₁₀ in its Annual Status Report, a position that was then accepted by DEFRA and which remains unchanged.
- 11.20 The 2021 Act and 2022 Regs have adopted new national standards for fine particulates PM_{2.5} as set out above in paragraph 11.11, which if complied with, would demonstrate a higher standard of compliance than set by the equivalent PM₁₀ standards. Since 2020, Winchester has monitored PM_{2.5} in only 2 locations which have shown annual mean levels in St Georges Street, to be at or around 9 µg/m³, with a level of 10.3 µg/m³ returned in 2022. In Twyford the monitor sighted in The High Street by the Village Hall, returned an annual mean in 2023 of 6.3 µg/m³, so well within the proposed standard.
- 11.21 Fine PM_{2.5} can travel long distances so are affected by both local, regional and international sources. Activities such as agriculture, emissions from wider conurbations outside of the district and even international sources, mean that its control is more challenging and needs to be addressed through a more collaborative regional approach. Hence the AQS proposes the setting up of a regional air quality network.
- 11.22 The AQ steering group agreed that WHO annual mean Interim Target 4, 10 µg/m³ be proposed as being realistically deliverable by 2030, which reflects the government's own standard, albeit to be delivered 10 years earlier. Officers have advised that the ultimate WHO Air Quality Guideline Standard of 5 µg/m³ is not currently realistically deliverable in most areas of the UK.
- 11.23 The proposed strategy does not currently seek to adopt a 1 hour PM_{2.5} standard, although the 2023 data set did return a set of results that demonstrated full compliance with WHO Interim Target 3 and only 8 exceedances of Interim Target 4. Again, for transparency, future Annual Status Reports will continue to return information on any exceedances of the WHO 24 hour air quality guideline standards.

Air Quality Strategy

- 11.24 In having agreed the proposed standards to be achieved by 2030, the Steering group tasked officers with drafting a strategy for the Council that would deliver the greatest confidence of success. Although officers had a good understanding of what these actions might be, in order to establish greater level of confidence, rigour and independence, they procured the

services of Ricardo an experienced air quality consultant, to assist them in identifying the actions and drafting a strategy that is customer facing and easily understandable. The proposed AQS strategy sets out the following:

- Council's vision.
- Why the Council needs to improving air quality.
- The current air quality position.
- Actions
- How the public can reduce their own exposure to poor air quality
- Monitoring and Evaluation
- Additional information on air quality

Strategy Actions

11.25 The thematic actions areas set out Appendix 1 of the Air Quality Strategy are:

1. Air Quality Monitoring and Modelling

- undertaking a source apportionment study to better understand the local and regional sources of NO₂ and PM_{2.5};
- Using low-cost monitoring technology to expand the NO₂ and PM_{2.5} monitoring network across the district and to promote a better regional monitoring network, includes 'citizen science' initiatives by engaging schools and community groups.
- Developing a wider regional air quality network to tackle transboundary pollution emissions.

2. Transport

- Support the delivery of the HCC Transport Plan to achieve a 10% reduction in traffic by 2030 and increase the use of public transport.
- Support the delivery of a Local Cycling and Walking Infrastructure Plan.
- Adoption of an anti-idling enforcement policy.

3. Business and Domestic Heating and Combustion

- Develop and deliver a public education and advisory policy on responsible solid fuel burning practices.
- Explore the feasibility of a Smoke Control Area across the district to reduce more emissions arising from bad solid fuel burning practices.
- Develop a planning guidance document to widen principles of the existing Air Quality Supplementary Planning Document to all development within the City Council's district, but outside of the South Downs National Park Planning Authority area.

- A commitment to work with South Downs National Park Authority to encourage the uptake of similar standards for development within the 'park'.
4. Indoor Air Quality
 - Develop a coordinated approach to educate and influence better practices that result in a reduction in unnecessary exposure to indoor pollutants.
 5. Construction and new developments
 - Investigate future potential changes to Local Plan Strategic Housing Policy to improve air quality such as housing density, site allocations, and public transport integration.

Consultation Responses

11.26 The public and stakeholder consultation solicited 132 responses an overall summary of which can be found in Appendix 3.

11.27 Overall:

1. 60% of respondents agreed with the AQS covering the whole of the district;
2. 66% agreed with the proposal to go above and beyond national minimum air quality targets;
3. 72% said that the strategy helped them to better understand what causes air pollution and it's impacts on health;
4. 62% agreed with the summary of air pollutants sources.
5. There was a strong correlation on agreeing to focus the strategy on sources of road traffic as well as commercial and domestic burning.

Changes made to the original AQS consultation

11.28 Subsequent to the consultation, some changes were made to the original draft AQS, as follows:

1. That the AQS was centred on Winchester and not enough on the wider district.

Response: AQS amended to make greater reference to its application to the whole of the Winchester district.

2. That not enough focus was placed on working to improve areas of poorest air quality.

Response: New paragraph included to emphasis a two tiered approach, such that whilst the AQS focuses on improving air quality across the district to meet the aspirational standards, additional work would be conducted to focus efforts on the areas of poorest air quality.

3. That the Graphic on p18 and AQS Appendix 1 seems to suggest that the 13 identified actions will be delivered in a linear way and will not concurrently.

Response: Whilst resource limitations cannot deliver everything all at once, equally it was acknowledged that many actions can be delivered concurrently over time. Instead of a linear graphic, this has been replaced with a 'bubble style' graphic on page 18 of the AQS.

Furthermore, Appendix 1 of the report has been changed to reflect a 'Gantt' style delivery plan, with overlapping delivery timescales.

4. To add a point of developing a better understanding of how air quality is presenting as public health impacts and cross referencing this to the Director of Public Health's Joint Strategic Needs Assessment (JSNA). This means that Source apportionment study outcomes should be correlated with JSNA and census data.

Response: Beneath the 9 points made under section 4.1 an additional paragraph has been added on p19 to reflect the relationship between air quality benefits and the JSNA.

5. The graphic under 4.3 Domestic and Business Heating and Burning, was thought not to visually best represent the actual relative emissions from the various heating types.

Response: The graphic has been adjusted to better show the relative emissions across the types of heating.

6. Under 4.4 Indoor Air Quality, the original DEFRA graphic used shows external emissions and not internal emissions sources or relative levels.

Response: In order not to be misleading, the DEFRA graphic was replaced, but as there are no equivalent indoor source emissions graphics available, this was replaced with photo showing common examples of indoor activities in the domestic and commercial setting.

7. AQS Appendix 1 the original draft showed inconsistencies on who was responsible for delivering on the 13 items, with both departmental and individual title designations being used.

Response: As well as changing the presentation to a 'Gantt' style the lead organisation was used instead of departmental and or individual title designations.

- 11.29 This paper requests that Cabinet considers and agrees that the strategy as set out in Appendix 1, can be approved and adopted.

12 OTHER OPTIONS CONSIDERED AND REJECTED

- 12.1 The Air Quality Strategy was developed in response to the Government's policy guidance and the relevant legislation described above that Local Authorities are required to:

'have regard to the Air Quality Strategy for England when exercising any function of a public nature that could affect the quality of air'.

There is a corresponding expectation by central government for Local Authorities '

to develop their own AQS', to set out how they will improve air quality.

For the Council to demonstrate compliance with this duty, it has considered and rejected the option of not adopting a new Air Quality Strategy.

- 12.2 The air quality standards proposed in the AQS were subject to several steering group meetings, which generated considerable cross party discussion on what WHO level to pitch within the strategy. Further the development of the strategy was subject to multiple interventions by officers and members with the final presentation to the group made on 14th November 2024, with comments and feedback appropriately taken into account.
- 12.3 On December 16th, 2024, the government issued its English Devolution White Paper, setting out its aspirations to devolve power to the regions through setting up Mayoral Strategic Authorities followed by Local Government reform with the abolition of 2 tiered County and District Authorities in favour of Unitary Authorities.
- 12.4 Since then the County Council and the 3 Unitary Authorities of Southampton, Portsmouth and the Isle of Wight, have registered their interest to join the governments Priority Programme for Devolution, which if successful, will see the first Mayor voted in, in May of 2026. After this process has been completed there will be the adoption of the Unitary Authorities expected in 2027 or 2028. This process will take place during the delivery term of this proposed Air Quality Strategy and could have some impact upon the delivery of some of the actions contained within it.
- 12.5 However much of the Strategy seeks to deliver on aspirations which would be shared by any new Unitary Authority, indeed one of the national Air Quality Strategy objectives is to encourage regional working for the betterment of air quality across a wider area.
- 12.6 In having a pre-existing AQS, this will ensure that the Council has sufficient time to deliver on several of the aspirational expectations set out in the

strategy and the experiential benefits of delivering on these actions can then be shared across the new unitary authority area.

- 12.7 Furthermore, the Strategy itself is an iterative document and will be subject to an annual review during its 5 year term, so there will be opportunity to update actions and or refocus the strategy.

BACKGROUND DOCUMENTS:-

Previous Committee Reports:-

[CAB2906](#)

Adoption of Winchester Air Quality Action Plan 2017-2023 26th April 2017

Other Background Documents:-

[The air quality strategy for England - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

APPENDICES:

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| Appendix 1 | Air Quality Strategy for adoption |
| Appendix 2 | Membership of the Air Quality Steering Group |
| Appendix 3 | Summary of public consultation |