

Housing and Communities Overview and Scrutiny Panel - 22 January 2025

Draft Air Quality Strategy

Purpose	For review
Classification	Public
Executive Summary	<p>New Forest District Council has no declared Air Quality Management Areas and as directed by The Environment Act 2021; the council must proceed to publish an Air Quality Strategy to ensure air quality remains a high priority.</p> <p>Following the consultation process, and consideration of the responses, the draft Air Quality Strategy will be recommended for adoption.</p>
Recommendations	<ol style="list-style-type: none">1. That Panel review the draft Air Quality Strategy which will be considered by Cabinet in February 2025; and2. That the Panel supports the process for implementing the Air Quality Strategy and the recommendation that Cabinet approves the draft Strategy for public consultation.
Reasons for recommendation(s)	It is a legal requirement to develop an Air Quality Strategy by Local Authorities with no declared Air Quality Management Areas.
Ward(s)	All
Portfolio Holder(s)	Councillor Dan Poole – Portfolio Holder for Community, Safety and Wellbeing
Strategic Director(s)	Richard Knott – Strategic Director of Housing & Communities
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Introduction

1. This report advises on the development of a draft Air Quality Strategy (AQS) for New Forest District Council and provides an overview of the content of the draft Strategy. The report and draft AQS were presented to EMT prior to proceeding to the Housing and Communities Overview & Scrutiny Panel, where recommendations are sought for supporting the process to implement the AQS for New Forest District Council and approval for public consultation of the draft Strategy.
2. Following consideration of the draft AQS at Panel, the report will be taken to Cabinet on 5 February 2025. A public consultation period of 8 weeks will then be undertaken and after consideration of the comments, a finalised AQS will be progressed for adoption in mid-2025.

Background

3. Local Authorities have a statutory duty through the Local Air Quality Management (LAQM) regime to review and assess local air quality in their district in accordance with legislation, Government policy and guidance. Where an air quality objective is being, or likely to be, exceeded, an Air Quality Management Area (AQMA) must be declared.
4. New Forest District Council (NFDC) - Environmental Protection, has undertaken the review and assessment of local air quality proactively since 1998 using a combination of desktop, monitoring and modelling techniques. All assessments have been submitted as required to Government and all necessary action taken.
5. The Environment Act 2021 updated the LAQM regime to require local authorities from 2023 with no declared AQMA's to produce an AQS for their district.
6. In August 2023, after consultation with Defra and other relevant stakeholders, NFDC revoked its remaining AQMA (Lyndhurst) due to pollutant concentrations meeting the air quality objectives within

the AQMA for 8 consecutive years. Officers have subsequently progressed work to develop a draft AQS.

7. The draft AQS has been developed with the assistance of air quality consultants Ricardo-AEA Ltd and relevant stakeholders. The stakeholders included officers from NFDC (planning, climate change and health and well-being), New Forest National Park (planning), Hampshire County Council (public health and transport), local industry (Exxonmobil) and the Environment Centre. All stakeholders proactively contributed to the development and text of the draft AQS.
8. NFDC is one of the two Local Authorities in Hampshire (without an AQMA) who are leading on developing an AQS, due in part to our local air quality expertise and the priority to continue to improve air quality across the district.

Overview of draft Air Quality Strategy

9. The aim of the AQS is to continue to improve local air quality beyond the air quality objectives set by Government. This will be achieved through the identification of specific action areas for development in partnership with relevant stakeholders.
10. The AQS is a working document which provides a framework of action areas for development, with the aim for an evidence-based approach to assess and improve local air quality where relevant.
11. The Strategy identifies areas of alignment with other strategies, plans and policies at a national, regional and local level, for example with the Hampshire Public Health Strategy 2023-2026 (Hampshire CC) and the Climate Change and Nature Emergency Annual Update 2023/24 (NFDC).
12. The draft AQS advises on air pollution and the harm to human health and provides details on air quality within the New Forest district. Ricardo has undertaken air quality modelling to identify the potential sources of airborne pollutants within the New Forest district.
13. The modelling work provided the base evidence for the development of some of the priority action areas of the AQS, for example, the focus on wood burning and transport emissions. Other action areas were identified by officers and stakeholders as areas requiring further development to obtain improvements in public health, such as improving public awareness and behaviour change, and reducing health inequalities with regards to exposure to air pollution.

14. Six action areas are identified within the draft AQS which are:
 - Public awareness and behaviour change
 - Reducing health inequalities
 - Improving our understanding of particulate matter pollution
 - Wood burning and indoor air pollution
 - Reducing road traffic emissions, and
 - Reducing the impact of new developments

Each action area details why that area is important, what actions are already being undertaken by the council and stakeholders and identifies potential future areas of work.

15. The work to forward the Strategy action areas will be undertaken by a Steering Group of stakeholders with Member support. Actions will be progressed via agreed annual work plans.
16. The LAQM regime of review and assessment of local air quality against the air quality objectives remains and will be maintained alongside the implementation of the AQS.
17. The draft Air Quality Strategy is attached (**Appendix 1**).

Corporate plan priorities

18. The adoption of the AQS for New Forest District Council is a statutory requirement and relates to the following corporate priorities.
19. **Theme:**
Empowering our residents to live healthy, connected and fulfilling lives and protecting our climate.
20. **Corporate Plan Objective:**
Protect and improve the health and wellbeing of our communities.
21. **Service Objective:**
Adoption and implementation of the AQS for New Forest District Council.

Options appraisal

22. **Option 1:**
It is recommended Panel approve the draft Air Quality Strategy and recommend that it progresses to Cabinet in February and public consultation.

23. **Option 2:**

The alternative is to not prioritise the publication of an Air Quality Strategy. However, the Council is legally required to adopt an AQS. Failure to approve and adopt an AQS may leave the Council open to legal challenge, including by Defra. This option was not considered appropriate given the Council's corporate plan commitments to the health of its residents.

Consultation undertaken

24. There is no guidance or recommendation from Defra regarding how to develop an Air Quality Strategy and who to consult with. As advised in paragraph 7, internal and external stakeholders were consulted and involved in the development of the draft AQS. These stakeholders proactively engaged with the development of the text and actions noted within the Strategy.
25. There will also be further opportunities to engage with other relevant stakeholders as the AQS is progressed, for example the UKHSA, Environment Agency, NHS and Forestry England.
26. Consultation is recommended prior to approval of the AQS, and the next proposed step is for public consultation. All comments received will be reviewed and the draft AQS amended as required prior to final adoption.

Financial and resource implications

27. The cost to develop the draft AQS has been funded from existing budgets, however there is likely to be an annual cost to implement the actions arising from the Strategy. The cost for implementation of the Strategy will be determined through work plans and stakeholder involvement. Future work may include additional monitoring of pollutants within the district and potential consultancy costs to assess and model pollutants, when necessary, to further develop the Strategy priorities and assess the impact of any measures implemented.
28. Existing budgets will fund part of the costs to implement the AQS. However, further funding opportunities will need to be explored such as securing additional funding from Government grant funding schemes either individually or by working collaboratively with neighbouring authorities to reduce costs and the possibility of funding from planning contributions.
29. There is also resource implication for officer engagement to implement the AQS. This work would be completed by current positions within the Service and across the Council. However, there

may be some opportunity for collaborative working with other local authorities to develop and implement specific schemes. There is also an option to continue work with Southampton University using their expertise in air quality data analysis.

Legal implications

30. In accordance with The Environment Act 2021 the Council is required to develop and adopt an AQS where there are no AQMA's within their district. Legal implications of failing to adopt an Air Quality Strategy may result in challenge from Defra.

Risk assessment

31. There is no requirement for a formal risk assessment. Any risks in delivering the Strategy will be reviewed in terms of task-based actions and staffing and financial resources required to deliver the actions which will continue to improve local air quality.

Environmental / Climate and nature implications

32. The development and implementation of an AQS for New Forest should align with policies concerning health, climate and nature, reducing emissions from vehicles and by working with local industry. Actions forwarded within the Strategy will be developed by the steering group and address impacts on the environment, climate and nature.

Equalities implications

33. The Environment Act 2021 has been assessed by Government as being compliant with United Kingdom equalities and human rights legislation. Furthermore, the action areas identified within the draft AQS aim to link areas of health inequalities with air quality to enable suitable targeting of action to reduce the impacts of airborne pollution on those most vulnerable in the New Forest district.

Crime and disorder implications

34. No specific implications.

Data protection / Information governance / ICT implications

35. No specific implications.

New Forest National Park implications

36. The AQS for New Forest covers both the New Forest District Council and New Forest National Park areas. The aim of the Strategy is to improve air quality and therefore benefit these areas, however the development of specific actions needs to ensure any potential negative impacts are identified and appropriately considered.
37. The inclusion of the New Forest National Park in the development of the Strategy, and on the strategy steering group should ensure all partner agencies are included in the development of actions, decision making and delivery. Therefore, avoiding duplications, conflicts of policy or unreasonable impacts.

Conclusion

38. The Council is legally required to develop an AQS for New Forest following the revocation of its remaining Air Quality Management Area in 2023. The draft strategy has been consulted on with stakeholders and is now seeking approval to consult more widely on the draft document.

Appendices:

Appendix 1

Draft Air Quality Strategy

Background Papers:

Defra LAQM Policy:

[England \(exc. London\) Policy Guidance | LAQM](#)