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Your ref: Air Quality Action Plan Consultation
Our Ref: CIRIS 94016

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Dear Mike,

Havering Council Draft Air Action Delivery Plan (2025-2030)

Thank you for the opportunity for the UK Health Security Agency (UKHSA) to comment on the Draft Air Quality Delivery Plan (AQDP) prepared by Havering Council, covering the period between 2025 and 2030. Havering Council notes that the main pollutant of concern surpassing national air quality standards is nitrogen dioxide (NO_2).

UKHSA's approach to improving air quality

UKHSA's position is that some pollutants, such as NO_2 and particulate matter, are non-threshold – i.e., there is no known level of exposure below which health impacts don't occur. This means that any improvement in air quality, even below Air Quality Objective Levels and Standards, is associated with benefits to people's health. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as by increasing active travel and physical exercise or improving access to and quality of greenspaces).

It is important that local authorities keep working to reduce levels of air pollution not only in Air Quality Management Areas (AQMAs) but across the wider local authority area. The evidence around the role of fine and ultrafine fractions in the health effects of air pollution is growing. In 2021 the World Health Organization reduced their

guideline level for $PM_{2.5}$ from 10 µg/m^3 to 5 µg/m^3.[1] In January 2022, the Committee on the Medical Effects of Air Pollutants (COMEAP), an expert committee of the Department of Health and Social Care, published updated guidance on the health evidence relevant to setting PM2.5 targets.[2] This was intended to inform the Department for Environment, Food and Rural Affairs (Defra's) development of air quality targets under the Environment Act 2021. The advice included that reducing concentrations below the WHO guideline value of 5 µg/m^3 would benefit public health.

We support awareness raising measures, including alerting and campaigns providing information and advice to businesses and the public explaining how people can minimise their contribution to air pollution and also their exposure to air pollution.

Points for consideration

1. Page 7 refers to the UK national air quality objectives for NO_2, $PM_{2.5}$, and PM_{10} (Table 1), but does not indicate the source of these values. We understand these were taken from the Air Quality Standards Regulations 2010[3], and recommend including a citation for this source in the table.
2. Page 12 refers to air quality in Havering as overall "good". We advise against any reference of air quality, particularly in an AQMA as e.g. generally 'good'. Such terminology may reduce momentum for actions to intervene and improve air quality overall. The objective is a standard based on achievability; and we know that air pollution concentrations below the objective standards can still cause health effects.
3. Figures 2 and 3 include descriptions of their respective results; however, a description of results is missing for Figure 4. Although page 18 notes that the $PM_{2.5}$ air quality objectives have been met, it is unclear which category band the higher concentrations shown in Figure 4 fall into. Therefore, we believe it would be useful to include a short description of the results under Figure 4 as well.
4. In the 'Sources of Air Pollution' section (page 18), the annual mean $PM_{2.5}$ concentrations are stated to have remained steady over the monitoring period and below the annual mean air quality objective (AQO) of 25 µg/m^3. However, we are unsure why the AQO is referred to as 25 µg/m^3 here, as Table 1 lists it as 20 µg/m^3.
5. With reference to page 27, UKHSA notes that AQAP 2025-2030 Havering Priorities include promoting and enforcing the Smoke Control Area, which

[1] World Health Organization. (2021). WHO global air quality guidelines: particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide. World Health Organization. https://apps.who.int/iris/handle/10665/345329

[2] COMEAP: Update to advice note on deriving Environment Act PM2.5 targets https://www.gov.uk/government/publications/fine-particulate-air-pollution-pm25-setting-targets

[3] The Air Quality Standards Regulations 2010. https://www.legislation.gov.uk/uksi/2010/1001/contents

includes raising awareness around indoor air pollution. Havering Council may additionally want to broaden the scope for awareness of indoor air pollution beyond burning and consider the guidance on indoor air quality issued by the National Institute for Health and Care Excellence (NICE) in 2020[4]. The guidance includes recommendations for local authorities on how to improve indoor air quality, such us reducing exposure from cooking emissions, cleaning products, and smoking. Havering Council may also wish to consider UKHSA's systematic literature review on portable air purification systems, which have been identified to reduce indoor $PM_{2.5}$ levels[5].

6. With reference to page 28, UKHSA also notes that AQAP 2025-2030 Havering Priorities include raising awareness and improving air quality in and around schools. Havering Council may wish to consider UKHSA's literature review on air quality in schools across high income countries[6], which provides a set of recommendations for local authorities that could be considered for inclusion in this AQAP.
7. UKHSA notes that Havering Council proposed reducing emissions from building and developments as one of the main six action themes the council will take over the next five years to improve air quality in the borough. Within this theme, we note there is an action to ensure emissions from construction sites are minimised, and therefore, Havering Council may wish to consider the Guidance on the assessment of dust from demolition and construction[7] as well as the Guidance on Monitoring in the Vicinity of Demolition and Construction Sites[8] produced by the Institute of Air Quality Management (IAQM).

Concluding remarks

The draft Air Quality Action Plan (AQAP) 2025-2030 provides an overview on current exposures to air pollution in Havering Council, namely NO_2, $PM_{2.5}$ and PM_{10}, and sets out the Council's priorities and actions to reduce exposure and improve air quality over the next five years. UKHSA supports measures to reduce sources of air pollution and people's exposure, such as those outlined in the draft AQAP. Havering Council has also provided measures targeting defined areas within the borough, where local concerns have been raised, such as Arnolds Field, Launders Lane, in Rainham. We note that many of the measures outlined in the AQAP are aimed at improving air quality

[4] National Institute for Health and Care Excellence (2020). Indoor air quality at home. https://www.nice.org.uk/guidance/ng149
[5] Cheek et al., (2021). Portable air purification: Review of impacts on indoor air quality and health. https://doi.org/10.1016/j.scitotenv.2020.142585
[6] Osborne et al., (2021). Air quality around schools: Part I - A comprehensive literature review across high-income countries. https://doi.org/10.1016/j.envres.2021.110817
[7] IAQM Guidance on the assessment of dust from demolition and construction (2014). https://iaqm.co.uk/text/guidance/construction-dust-2014.pdf
[8] IAQM Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites (2018). guidance_monitoring_dust_2018.pdf

across Havering Council. This acknowledges the transient nature of pollution; whereby the negative effects of air pollution may occur at locations other than where the emissions occur. We also encourage evaluation strategies to be put in place where possible to monitor the effectiveness and share wider learning.

Yours sincerely,

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