

# **Report of the Strategic Director – Health and Wellbeing to the meeting of the Regeneration and Environment Overview and Scrutiny Committee to be held on 23 October 2018**

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## **Subject:**

**Air Quality**

## **Summary statement:**

**Bradford currently experiences air pollution which exceeds legal limits for nitrogen dioxide in some parts of the City. This has been reported annually to Defra by the Council in accordance with our local air quality management duties. In March 2018 the Council were required by Defra to carry out a feasibility study in order to identify solutions to Bradford’s air quality problems. Following the outcomes of this study Government have served a ministerial direction on the City of Bradford Metropolitan District Council to carry out a more detailed study to develop a plan designed to bring forward legal compliance in the shortest possible time. The Ministerial Direction requires that the local authority produces a final plan by 31st October 2019.**

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## **Portfolio:**

**Health and Wellbeing**

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## **Overview & Scrutiny Area:**

**Regeneration and Environment**

## **1. SUMMARY**

- 1.1 Air pollution is a significant environmental risk to the public's health, contributing to cardiovascular disease, lung cancer and respiratory diseases. It increases the chances of hospital admissions, and respiratory and cardiovascular symptoms which interfere with everyday life. Poor air quality affects everyone but it has a disproportionate impact on the young and old, those with underlying conditions and those less affluent (Defra, PHE, LGA 2017). In Bradford 5% of all early deaths are attributed to air pollution (PHE 2016). This is the equivalent of approximately 200 early deaths per annum.
- 1.2 Bradford has air pollution which exceeds the legal limits for nitrogen dioxide in some parts of the City. This has been reported annually to Defra by the Council in accordance with our local air quality management duties. In March 2018 the Council were required to carry out a feasibility study to identify solutions to Bradford's air quality problems which would bring forward the date by which Bradford would achieve compliance with the legal limit of an annual mean of  $40\mu\text{g}/\text{m}^3$  for nitrogen dioxide. Subsequent to the outcomes of this study Government have served a ministerial direction to Bradford Council to carry out a more detailed study to develop a full business plan that will bring forward compliance in the shortest possible time. The ministerial direction is in recognition of Bradford's persistent air quality problems. The study has identified that some areas of the city will be in exceedance of the legal limits until 2027 without significant intervention. Similar requirements have been made in over 50 other towns and cities including Leeds, Manchester, Sheffield and Rotherham.

## **2. BACKGROUND**

- 2.1 Bradford has been engaged in a proactive air quality improvement programme since the adoption of the Bradford Air Quality Strategy in 2011. This work has been further developed through the policy commitments within the Bradford Low Emission Strategy in 2013 and the West Yorkshire Low Emission Strategy (WYLES), which was initiated by Bradford and adopted by the 5 West Yorkshire local authorities and West Yorkshire Combined Authority (WYCA) in 2016. This work has delivered some significant changes, a few examples of which are;
- i) Changes to planning policy which require air quality mitigation such as electric vehicle charging and fleet standards on all relevant schemes.
  - ii) Work with local bus companies to deliver bus retrofit programmes and set standards to make buses cleaner
  - iii) An Ecostars programme encouraging local businesses, bus fleets and Council fleets to operate cleaner vehicles
  - iv) A WYLES commitment to implement Clean Air Zones where they are found to be necessary
- 2.2 This work has been complimented by a comprehensive air quality monitoring programme and reporting to Defra via annual air quality status reports.
- 2.3 Bradford's air quality improvement work and associated regional initiatives have been recognised nationally as examples of good practice, however, the monitoring programme indicates that Bradford continues to have areas that exceed the legal limits for nitrogen dioxide in some parts of the City and that air pollution isn't improving as quickly as expected in government projections.

2.4 In 2014 a Low Emission Zone Feasibility, funded by Defra, and carried out by the Council indicated that Bradford could make significant improvements to public health via changes in the fleet profile of vehicles in Bradford from older diesel vehicles to cleaner alternatives, by increasing active travel and reducing the number of cars. The results indicated such changes would improve air quality and achieve reductions in childhood asthma development, early deaths, coronary events and low birth weights. This work was reported to the Health and Wellbeing board and the Executive in March 2015.

2.5 In March 2018 Bradford were instructed by Ministerial Direction to deliver over a period of three months a feasibility study setting the following out for each road link identified as having a projected NO<sub>2</sub> exceedance;

- Nature of the exceedance
- The location
- Recommended interventions that would achieve compliance including the timetable for implementation, an estimate of the improvement and the time it will take to make the improvement.

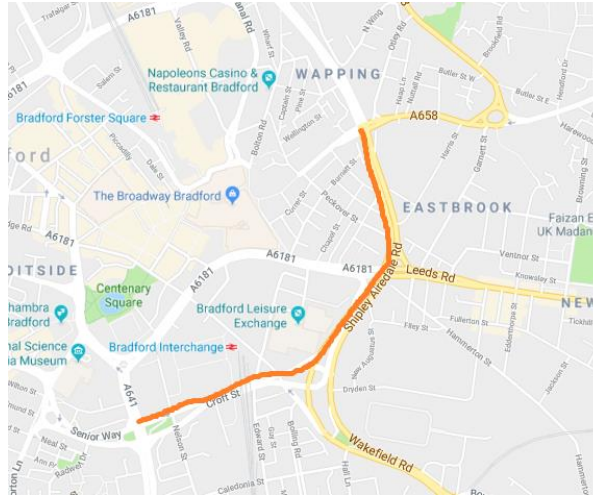
The study was designed to identify interventions that would bring forward Bradford's compliance timescale with the EU limit values for nitrogen dioxide. Bradford was one of a number of third wave of local authorities which were required to undertake these studies. The study was submitted to Defra in July 2018. The study determined that at some locations Bradford has elevated concentrations of nitrogen dioxide (NO<sub>2</sub>) that are not expected to meet the EU limit value until timescales ranging between 2020 and 2027 as follows;

**Annual average NO<sub>2</sub> concentrations modelled for 2019 in non-compliance (µg m<sup>-3</sup>) and expected year of compliance (NO<sub>2</sub> annual mean 40µg/m<sup>3</sup>).**

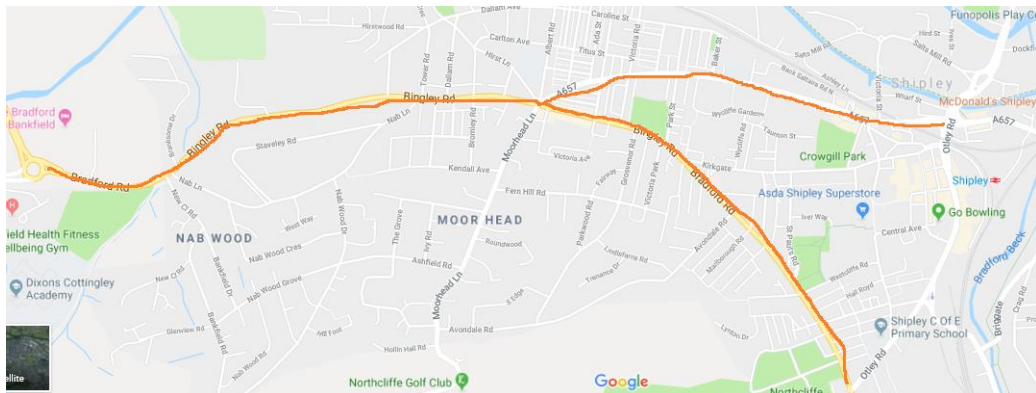
Road link ID	Road Name	NO <sub>2</sub> (2019) ug/m <sup>3</sup>	Expected year of compliance
58269	Leeds Rd	41	2020
8580	A650 Shipley Airedale Rd	52	2024
7413	A650Shipley	58	2027
37487	A657 Shipley	49	2023
28710	A650 Bingley Road	40	2019
74397	A6177 Rook Lane	40	2019
80860	A650 Bingley Road	40	2019

## Location Maps of exceedances

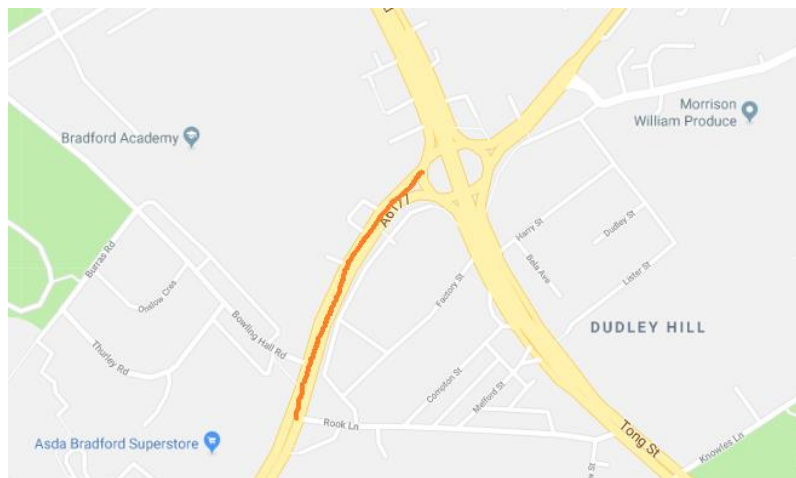
Map 1 Leeds Rd A647 and Shipley Airedale Rd A650



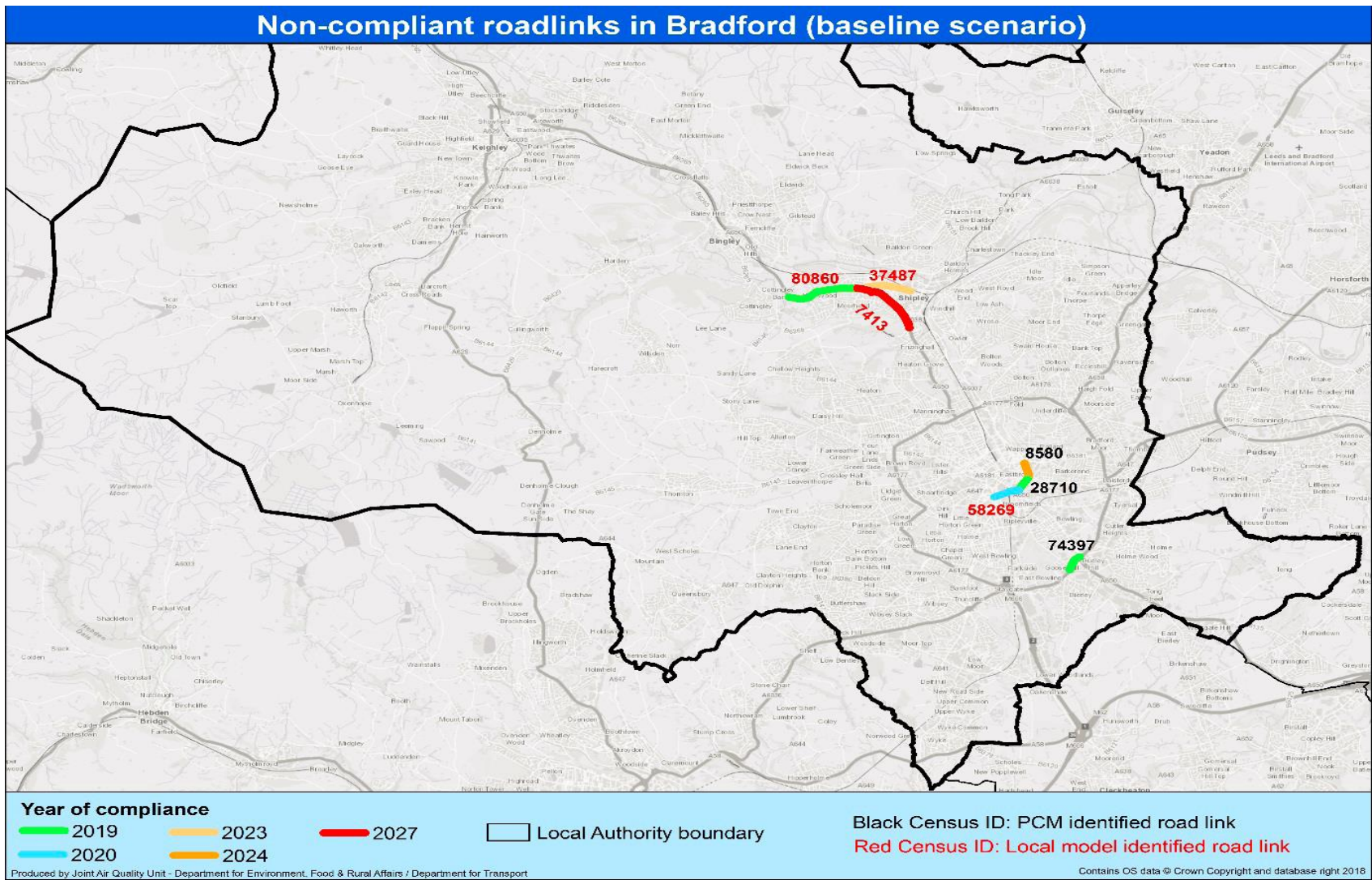
Map 2 A657 Saltaire Road and A650 Bradford Road. Shipley



Map 3 A6177 Rook Lane



Map 4 All exceedances In Bradford;



- 2.6 It was identified (via a process lead by Defra), that the compliance dates were further into the future than Defra had assumed previously (2027 not 2021), therefore, it was concluded that there was a need for Bradford to implement a scheme of significant action to bring the city into compliance with the legal limits, and furthermore that there was sufficient time in which to do so. This would now require further detailed consideration before any action could realistically be undertaken by Bradford. Bradford's final submission reiterated that funding, technical support, consideration of regional factors and a sufficient timescale would be required to fully investigate all possible interventions.

## MINISTERIAL DIRECTION

- 2.7 A teleconference with Defra on the 19<sup>th</sup> September discussed both the outcome of the study and subsequent Ministerial discussions. On the 5<sup>th</sup> October the Council was served with a Ministerial Direction requiring the following;
- An initial plan by **31<sup>st</sup> January 2019** – setting out the case for change and identifying, exploring, analysing and developing options for interventions which the local authority will implement to deliver compliance in the shortest time possible and an indicative cost for those options
  - A final plan by **31<sup>st</sup> October 2019** – Identifying the preferred option for delivering compliance in the shortest possible time and setting out value for money considerations and implementation arrangements
- 2.8 This replicates earlier Ministerial Directions to other Councils, and Bradford is one of an additional small number of other local authorities who have been similarly served with a Direction at this time. Defra have indicated that Bradford will receive similar levels of funding and support as other local authorities previously required to undertake these studies. Completion of the final plan is required by the 31<sup>st</sup> October 2019, a 6 months shorter period than applied to previously mandated local authorities. This will be followed by a period for full public consultation (time period not yet defined).
- 2.9 It is envisaged that the plan and expected government support and funding for implementation works will improve air quality over and above current plans in Bradford prior to the serving of this ministerial direction. Given the widespread nature of the exceedances (see map 4), it is considered likely that any interventions will improve air quality across larger areas of the district, meaning that pollution should be reduced across wider areas of the population (including schools, residential areas and health care settings).
- 2.10 It is expected by Defra that Bradford will work closely with Leeds Council, who were notified in December 2015 of their need to take action and having progressed their plan are pursuing a Clean Air Zone.
- 2.11 Officers have met with the Leeds team who are responsible for the delivery and implementation of the work. The Leeds team have approximately 10 full time members of staff working on various aspects of the feasibility study, procurement, communications and consultation, with additional support required from other departments such as legal. The project has a high level of political and senior officer support. To date Leeds have received approximately £1m in resources from Defra and draft implementation costs are expected to be significantly higher.

### **3. OTHER CONSIDERATIONS**

To be determined in consultation with Defra.

### **4. FINANCIAL & RESOURCE APPRAISAL**

None.

### **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

No significant risks arising out of the implementation of the proposed recommendations

### **6. LEGAL APPRAISAL**

No legal issues arising

### **7. OTHER IMPLICATIONS**

#### **7.1 EQUALITY & DIVERSITY**

None

#### **7.2 SUSTAINABILITY IMPLICATIONS**

None

#### **7.3 GREENHOUSE GAS EMISSIONS IMPACTS**

None.

#### **7.4 COMMUNITY SAFETY IMPLICATIONS**

None

#### **7.4 HUMAN RIGHTS ACT**

None

#### **7.6 TRADE UNION**

None

#### **7.7 WARD IMPLICATIONS**

To be determined as part of the full business case

#### **7.8 IMPLICATIONS FOR CORPORATE PARENTING**

None

## **7.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT**

None

## **8. NOT FOR PUBLICATION DOCUMENTS**

None

## **9. OPTIONS**

To undertake the work required by the ministerial direction and update Regeneration and Environment Overview and Scrutiny Committee as part of the consultation process

## **10. RECOMMENDATIONS**

To undertake the work required by the ministerial direction and report back to Regeneration and Environment Overview and Scrutiny Committee

## **11. APPENDICES**

None

## **12. BACKGROUND DOCUMENTS**

None