

# LONDON BOROUGH OF CROYDON

<b>REPORT:</b>	<b>CABINET</b>	
<b>DATE OF DECISION</b>	<b>15 MAY 2024</b>	
<b>REPORT TITLE:</b>	<b>Air Quality Delivery Plan 2024-2029</b>	
<b>CORPORATE DIRECTOR / DIRECTOR:</b>	<b>Nick Hibberd, Corporate Director, Sustainable Communities, Regeneration &amp; Economic Recovery</b>  <b>Karen Agbabiaka, Director of Streets &amp; Environment</b>	
<b>LEAD OFFICER:</b>	<b>Linda Johnson, Pollution Team Manager</b>	
<b>LEAD MEMBER:</b>	<b>Councillor Scott Roche, Cabinet Member for Streets &amp; Environment</b>	
<b>AUTHORITY TO TAKE DECISION:</b>	<b>Part 3 of the Constitution: The Council has determined that all local choice functions contained in Schedule 2 of The Local Authorities (Functions and Responsibilities) Regulations 2000 except approval of non- executive contracts, are to be Executive functions.</b>	
<b>KEY DECISION?</b>		<b>YES</b>  As defined in Article 13.02 (d)(ii) of the Constitution: namely an executive decision, which is likely to be significant in terms of its effects on communities living or working in an area comprising two or more Wards in the Borough.  0124SCRER
<b>CONTAINS EXEMPT INFORMATION?</b>		<b>No</b>
<b>WARDS AFFECTED:</b>	<b>All</b>	

## 1. SUMMARY OF REPORT

- 1.1 As detailed in the report, the Council has a statutory duty to adopt an Air Quality Delivery Plan. This report seeks authority to undertake a statutory consultation on the Council's new draft Air Quality Delivery Plan 2024–2029 and a supporting delegation to the Corporate Director of Sustainable Communities, Regeneration & Economic Recovery.
- 1.2 Since 2002, the whole of Croydon has been designated as an Air Quality Management Area (AQMA). As such the Council has a statutory duty to produce an Air Quality Delivery Plan. Croydon has previously produced four Air Quality Action Plans with the latest ending in 2022.

- 1.3 The Executive Mayor of Croydon's Business Plan 2022–2026 sets out priorities to ensure Croydon is a place of opportunity for business, earning and learning by supporting the regeneration of Croydon's town and district centres through investment and grants, ensuring that Croydon is a cleaner, safer and healthier place, a borough we're proud to call home and that people can lead healthier and independent lives for longer.
- 1.4 The UK has legally binding targets to reduce overall national emissions of five air pollutants (fine particulate matter, ammonia, nitrogen oxides, sulphur dioxide, and non-methane volatile compounds) by 2020 and 2030. The Government has set two further targets for fine particulate matter (PM<sub>2.5</sub>) in England through The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 (SI 2023/96). The targets are:
- An annual mean concentration target – a target of 10 micrograms per cubic metre (µgm<sup>3</sup>) to be met across England by 2040.
  - A population exposure reduction target – a 35% reduction in population exposure by 2040 (compared to a base year of 2018).
- 1.5 London Local Air Quality Management (LLAQM) 2019 guidance sets out the process London Councils are required to follow when developing Air Quality Delivery Plans, it sets out in Policy Guidance and Technical Guidance issued by the London Mayor in 2019. The GLA supervises Delivery Plans for Greater London and has been given the powers to intervene and direct boroughs under Part IV of the Environment Act 1995. These policy and technical guidance documents outline changes to the Local Air Quality Management system and include the introduction of an air quality Annual Status Report (ASR) to amalgamate all other reporting requirements.
- 1.6 The Councils' priorities for the draft Air Quality Delivery Plan 2024–2029 are:
- a) Work towards the 2005 WHO guidelines for PM<sub>2.5</sub> with a target of compliance deadline by 2030 and review the emerging policies from the GLA in respect of the 2021 WHO guidelines;
  - b) Increase the network of air quality monitoring across the borough;
  - c) Continue to engage schools around whether there is a need to introduce further Croydon Healthy School Streets (this can include traffic calming measures, Air Quality audits and increase of green infrastructure) whilst recognising that such matters also have attendant statutory consultation requirements and procedures which would need to be adhered to and substantiated including on Traffic Management grounds, prior to any introduction.
  - d) NRMM (Non-Road Mobile Machinery), particularly from the construction sector, is a significant contributor to London's air pollution accounting for around seven per cent of NO<sub>x</sub> and eight per cent of PM<sub>10</sub> emissions in London. It is a statutory requirement to undertake regular inspections to ensure compliance - major developments are required to submit a construction logistics plan (CLP) or Construction Environmental management plan (CEMP) prior to commencement;
  - e) As Croydon is an AQMA, new developments should be air quality positive or at least 'air quality neutral';

- f) Continue to raise awareness and encourage behaviour changes through air quality campaigns;
  - g) Assess potential impact of intensifying Electric Vehicle Infrastructure;
  - h) Reduce emissions from the burning of non seasoned wood – reduce particulate emissions from wood burning in the home via an awareness campaign of appropriate words for burning;
  - i) Assess the wider role of fleet within the services the Council provides to ascertain compatibility with the Council's air quality aims. The Council fleet currently comprises 98 leased vehicles, 54 owned vehicles and 10 short-term hired vehicles. In addition there are many other Council services for which fleet would form part of their provision – i.e. all deliveries of any contractors to the Council, FM Conway (Highways), Veolia (waste and street cleansing), arbo-cultural providers. However, there are major financial implications regarding this action which will need further assessment;
  - j) Provide new cycling and walking infrastructure and assess air quality impacts of new infrastructure.
- 1.7 The draft delivery plan sets out how the Council proposes to effectively deliver against the above themes and priorities, thereby improving air quality issues that are within its control and thereby leading by example. However, it is important to recognise that these are local drivers proposed to reduce and tackle air pollution and that air pollution by its very nature is cross boundary.

## **2. RECOMMENDATIONS**

The Executive Mayor in Cabinet is recommended, having regard to the equalities impacts and other implications set out in the report and appendices, to:

- 2.1 Approve the commencement of a statutory consultation on the draft Air Quality Delivery Plan 2024-2029 attached at Appendix 1 to this report, for a period of 8 weeks.
- 2.2 Delegate authority to the Corporate Director of Sustainable Communities, Regeneration & Economic Recovery, in consultation with the Executive Mayor and the Cabinet Member for Streets & Environment, to consider the outcome of the statutory consultation on the draft Air Quality Delivery Plan, approve such amendments to the draft Plan as are necessary and approve the final Croydon Air Quality Delivery Plan 2024-2029 for adoption.

## **3. REASONS FOR RECOMMENDATIONS**

- 3.1 As Croydon is an Air Quality Management Area there is a statutory requirement to submit an Air Quality Delivery Plan designed to improve air quality within the area in accordance with statutory requirements, statutory guidance and Mayor of London guidance.
- 3.2 The draft plan has been sent to the GLA twice for comments and amendments were made. Once the draft plan has been agreed by Cabinet the Council will undertake an 8 week consultation on the actions identified within the draft plan.

## 4. BACKGROUND AND DETAILS

- 4.1 Air quality is an important Public Health issue in London. It contributes to shortening the life expectancy of all Londoners, disproportionately impacting on the most vulnerable.
- 4.2 The whole of Croydon has been designated as an Air Quality Management Area (AQMA) since 2002 due to exceedances of the nitrogen dioxide air quality objective. As such the Council has a statutory requirement to produce an Air Quality Delivery Plan. Croydon has produced four Air Quality Delivery Plans with the last ending in 2022.
- 4.3 The Council must produce an integrated five year action plan to focus on local actions the council can take to reduce emissions and minimise exposure of air pollutants to those who live and work in Croydon.
- 4.4 There is also often a strong correlation with equalities issues because areas with poor air quality are also often the less affluent areas. Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. The Council is committed to reducing the exposure of people in Croydon to poor air quality in order to improve health.
- 4.5 The aim is to reduce exposure to air pollution and to raise awareness for residents and those who work in Croydon. It has been estimated that up to 40% of pollution in Croydon is from outside London and Europe therefore actions to reduce pollution in Croydon are limited. Engagement with residents and businesses is required to reduce exposure to air pollution and to raise awareness to change behaviour by encouraging people to walk and cycle more.
- 4.6 The agreed Actions within the final Plan as adopted, will be delivered across the life of the plan (2024-2029). Much of the work is subject to funding being available and it is known that resources across the Council are limited. Some of the proposed actions will be delivered within existing budgets by officers. However, some of the actions require funding which will potentially be sourced from:
- Planning Section 106 Obligations (air quality, transport and public health)
  - Local Implementation Plan (transport related measures)
  - Mayors' Air Quality Fund (MAQS)
  - DEFRA air quality grant
  - Public Health funding

Where possible, available funding streams will be pooled.

- 4.7 The aim of the new Air Quality Action Plan is to have an integrated approach to include Transport and Public Health measures. Some of the actions will be building on existing successful actions and some are new. The key priorities considered are detailed in paragraph 1.6 above.
- 4.8 The Council is committed to providing clear and strong leadership in Croydon. The Council will explore a wide ranging set of options, via the forthcoming consultation exercise, which will be reflected in the new Air Quality Delivery Plan.

- 4.9 Air Quality in Croydon was discussed at the Streets & Environment Scrutiny Sub-Committee on 1 November 2023 and 2 April 2024 for pre-decision scrutiny. Initial ideas for the above priorities were discussed and also further information regarding funding of these priorities were provided. The recommendations made by the scrutiny committee are detailed more fully in section 6 below and will be considered and reflected as appropriate in the plan as adopted.
- 4.10 Croydon Council cannot develop this plan in isolation and the Council will need the active support and participation of residents, businesses and partners if it is to succeed in improving air quality in our borough.
- 4.11 Croydon Council will work closely with the GLA to formulate its final plan. The recommendations made following on from discussions with the GLA, are included in the proposed draft plan for consultation, Appendix 1. They related to including KPI's within the action plan to monitor delivery and initial suggestions as to KPI's are included and these will be further developed as part of the statutory consultation to be included in the final Air Quality Delivery Plan.

## 5. ALTERNATIVE OPTIONS CONSIDERED

The requirement for the Air Quality Delivery Plan is detailed in the Legal Implications Section of this report.

## 6. CONSULTATION

6.1 As detailed at 4.9 above, the draft Air Quality Delivery Plan 2024-2029 has been before the Streets & Environment Scrutiny Sub Committee on 1 November 2023 and 2 April 2024 and was rigorously analysed and discussed by the sub committee at those two meetings. The recommendations from the committee following the meeting on 2 April 2024 were as follows:

- The Council further consider the roles that Biodiversity Net Gain and Urban Greening could have as part of the Air Quality Delivery Plan 2024-29.
- Officers work with the Planning department to see what conditions around air quality could be developed for use with future developments. *Officers have responded to this by ensuring that the draft review of the local plan includes that all new developments should be air quality positive or at least 'air quality neutral'.*
- Officers consider what air quality initiatives could be embedded in the Local Plan around specific construction techniques, which could promote better air quality.

The above recommendations pertaining to biodiversity link into other supporting plans which the council has in place, including the Carbon Neutral Plan, adopted in 2022 and the Habitat Action Plan (Biodiversity Plan) which is still being developed and will cover various chalk grasslands, heathland, woodlands and hedgerows, cemeteries and churchyards and other open spaces. These supporting plans will be considered as part of the consultation on and adoption of any final AQDP. In addition, a number of the actions in the Air Quality Delivery Plan (Appendix One) require Pollution Team officers to collaborate with Planning colleagues to achieve outcomes.

- 6.2 Boroughs are required to submit their draft Delivery Plans to the GLA twice. It should be submitted before the public consultation and again afterwards. The final version of the Delivery Plan should only be approved by the Executive and published once the GLA has provided formal agreement of the document.
- 6.3 When carrying out their Part IV functions, Schedule 11 of the Environment Act 1995 requires consultation with a range of persons and organisations. The Mayor of London is the key statutory consultee and will need to approve final AQDPs prior to publication. In developing/updating the delivery plan the Council will consult with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 requires local authorities to consult the bodies listed below:

- The Secretary of State
- The Environment Agency
- Transport for London and the Mayor of London (joint response)
- All neighbouring local authorities
- Other public authorities as appropriate
- Bodies representing local business interests and other organisations as appropriate
- Residents and businesses eg. Residents' Associations and local BID's

In addition consultation will be undertaken via:

- Croydon's Air Quality Steering group\*
- Public notices in council offices
- Council Communications Team
- Public Health
- Imperial College – Environmental Research Groups
- Local community groups
- Mums for Lungs local representative

\*Croydon's Steering Group has met regularly with senior officers from the following teams recruited into the group's regular membership:

- Environmental Health, Trading Standards and Licensing
- Public Health
- Strategic Transport
- Strategic Planning
- Highways
- Climate Change
- Independent Travel

Other services/teams will be invited to the Air Quality Delivery Plan Group meetings when items relevant to their delivery responsibilities are placed on the agenda. This includes:

- Parking Services
- Parks
- Ecology & Trees
- Development Control
- Children's Services & Educational Development
- Housing Services
- Fleet Management
- Communications Team
- Procurement
- Legal Services

- 6.4 The updated Steering Group will be chaired by the Director of Streets and Environment to provide strategic direction, guidance and oversight to determine the priorities associated with the AQDP 2024-2029.

The final Air Quality Delivery Plan will include:

- Details of which pollutants the authority will be taking action on, and an indication of the pollutant emission source(s);
- What other local authorities are doing or will need to do to meet the action plan's objectives;
- The timescales for implementing each proposed measure and the emissions (and concentration, if possible) reductions expected by the end of the relevant review and assessment round as detailed in the London Local Air Quality Management (LLAQM) Technical Guidance 2019 (LLAQM.TG (19)); and
- Details of other individuals, bodies or agencies whose involvement is needed to meet the plan's objectives and what the authority is doing to encourage their co-operation.

6.5 In addition to the above the Council proposes to engage with the public to garner their ideas on how it can best tackle this issue. Many of the ideas are likely to include the need for people to change their current behaviour so it is important that the Council understands how it can best support and achieve this.

6.6 Secretary of State guidance indicates that whilst Local Authorities should decide the timescale for consultation, the recommendation is that the consultation exercise should take place over an eight to twelve week period. An 8 week consultation period is proposed for the Council's draft AQDP.

6.7 The final AQDP will be completed following the consultation process. Should significant revision of the document be required time must be factored in to complete the action plan. It is recommended that the Corporate Director of Sustainable Communities, Regeneration and Economic Recovery be given delegated authority to consider the outcome of the statutory consultation and, in consultation with The Executive Mayor of Croydon and the Cabinet Member for Streets & Environment, to make a decision as to whether to amend/update and then approve the final Croydon Air Quality Delivery Plan 2024-2029 for adoption.

## 7. CONTRIBUTION TO EXECUTIVE MAYOR'S BUSINESS PLAN

7.1 The Executive Mayor of Croydon's priorities are detailed in the Corporate Plan and highlight which outcomes the report and decision relate to:  
[Mayor's Business Plan 2022 - 2026 \(croydon.gov.uk\)](https://www.croydon.gov.uk/mayors-business-plan-2022-2026)

## 8. IMPLICATIONS

### 8.1 FINANCIAL IMPLICATIONS

8.1.1 Revenue and Capital consequences of report recommendation

	Current Year	Medium Term Financial Strategy – 3 year forecast		
	2023/24 £'000	2024/25 £'000	2025/26 £'000	2026/27

Revenue Budget Available				
Expenditure	530	530	530	530
Income	0	0	0	0
Effect of decision from report				
Expenditure	0	0	0	0
Income	0	0	0	0
Remaining Budget	530	530	530	530
Capital Budget available				
Expenditure	0	0	0	0
Income	0	0	0	0
Effect of decision from report				
Expenditure	0	0	0	0
Income	0	0	0	0
Remaining Budget	0	0	0	0

### 8.1.2 The Effect of the Decision

At this stage there is no impact on existing budgets and any additional work will not be undertaken until funding is secured. The revenue budget in the table above relates to the staffing and supplies costs of the Pollution Team within the Environmental Health, Trading Standards and Licensing service. Delivery of the Air Quality Delivery Plan is one of the functions of the Pollution Team, with only a small percentage of the budget allocated to the Delivery Plan, with the majority of funding secured from alternative sources. Spend will be committed once consultation on the proposed plan has been completed.

This report has minimal direct financial impact on existing revenue budgets. Following the completion of the consultation on the draft Air Quality Delivery Plan 2024–2029, funding will be sought from a number of sources including S106, CIL, Mayors' Air Quality Fund, DEFRA air quality grant and Public Health Grants.

### 8.1.3 Financial Risks

There is a risk that if this report is not approved, there will be no funding secured to improve Air Quality, which will have financial consequences within the public health and social care budgets over a number of years.

#### 8.1.4 Future Savings Efficiencies

Although there are not expected to be future savings and efficiencies within the Pollution teams' revenue budget, improved air quality could result in efficiency savings in other Council departments, for example public health. As a result of improved air quality and therefore, the improved health of residents within the borough. Additionally external funding will be sourced where possible for any work needed to reduce the cost against the revenue budget.

8.1.5 Comments approved by: Darrell Jones, Acting Head of Finance on behalf of the Director of Finance & Deputy S151 Officer – date 27<sup>th</sup> March 2024.

## 8.2 LEGAL IMPLICATIONS

8.2.1 The Environment Act 2021 (“the 2021 Act”, Part 4), the Environment Act 1995 (“the 1995 Act”), the Clean Air Act 1993 and the Environmental Protection Act 1990 establish frameworks for local authorities to address air quality. The basic statutory framework is put in place for local air quality management by Part IV of the Environment Act 1995, (as amended, and “Part IV functions” of this Act) and national air quality regulations. This remains in place and is applicable to London’s 32 boroughs. However, it was agreed with the Department for the Environment Food and Rural Affairs (DEFRA) in 2016 that the relevant local air quality management policy guidance for London should be different from that in the rest of the country in recognition of the particular challenges London faces. DEFRA have agreed that policy guidance for London should be issued by the Mayor, in recognition of his London-wide supervisory role. This reflects the Secretary of State’s own statutory guidance. As a result, London boroughs need to refer to the London Local Air Quality Management (LLAQM) policy document issued in 2019, the accompanying LLAQM Technical Guidance, 2019 and the LLAQM Borough Air Quality Action Matrix, 2019 as issued by the Mayor and updated from time to time, rather than national guidance issued by DEFRA in reflecting whether or not the Council is in compliance.

8.2.2 Boroughs have a duty under Section 83(1) of the 1995 Act to designate areas as Air Quality Management Areas (AQMA’s) where air quality objectives are not being met, or are shown to be likely at risk of not being met, and where people are likely to be regularly present. As detailed earlier in the report, the entire London Borough of Croydon has been declared an AQMA.

8.2.3 When an AQMA has been designated, section 84 (2) of the 1995 Act requires a written “action plan” for the exercise of any of the borough’s relevant potential powers to achieve air quality standards and objectives to be prepared. An Air Quality Action Plan (AQAP) should be prepared within 12 months of an AQMA being declared. The AQAP must include a statement of the time or times by or within which the borough proposes to implement each of the proposed measures comprised in the plan.

8.2.4 The applicable guidance makes clear that the AQAP should take a practical approach towards focussing on what really matters – identifying the nature of the problem and detailing measures that are or will be actively implemented to improve air quality and – where possible – quantifying their impact over time.

#### 8.2.5 AQAP's are expected to include the following:

- Quantification of the impacts of the proposed measures wherever possible – including, where feasible, data on emissions and concentrations (either locally obtained and/or via regional or national monitoring/modelling statistics). It is important that the borough shows how it intends to monitor and evaluate the effectiveness of the plan.
- Clear timescales, including milestones and expected outcomes which the borough and other delivery partners propose to implement the measures within the AQAP.
- How the borough, including its transport, planning and public health departments, and its other external delivery partners, will take ownership of the exceedance problem and in what capacity they will work together to implement the AQAP.

8.2.6 The GLA has developed an Air Quality Action Matrix, to help ensure co-ordinated, focused and consistent action across boroughs. Within their AQAP's boroughs should include all of the matrix actions (unless there are extenuating circumstances which have been agreed with the GLA) and commit to and ensure a strong focus on the key priority actions.

8.2.7 Boroughs are expected to revise their Air Quality Action Plans every 5 years as a minimum, and they should keep action records current and relevant by adding any new actions into the Action Table within the Annual Status Report which each borough is responsible for submitting to the Mayor of London.

8.2.8 When carrying out their Part IV functions, Schedule 11 of the 1995 Act requires consultation with a range of persons and organisations as detailed in the consultation section of this report.

8.2.9 Amendments made to the 1995 Act by the Environment Act 2021 strengthen the air quality duties by giving greater clarity on the requirements of action plans enabling greater collaboration between local authorities and all tiers of local government, as well as with Relevant Public Authorities, in the creation and delivery of those plans. It also requires the Secretary of State to regularly review the National Air Quality Strategy, which specifies the standards and objectives that local authorities need to achieve.

8.2.10 Part 3 of the Clean Air Act 1993 is the main legislative framework for the control of pollution from domestic solid fuel burning, a main contributor to fine particulate matter emissions in the UK. It gives local authorities the power to make an order designating parts of their area as Smoke Control Areas (SCAs), in which it is an offence to emit smoke from chimneys of buildings and chimneys that serve the furnace of any fixed boiler or industrial plant. The amendments in the 2021 Act enable local authorities to issue civil financial penalties instead of criminal prosecutions, with the aim of making enforcement quicker, simpler and more proportionate. It removes current statutory defences (including the use of an exempt appliance or an authorised fuel) which currently said to hinder enforcement. It strengthens the existing penalties for the sale of controlled solid fuels in SCAs, and ensure consumers are aware that it is an offence to buy these fuels for use in SCAs. It also gives local authorities the power to broaden the scope of their SCAs to include moored vessels, subject to local consultation.

8.2.11 Part 3 of the Environmental Protection Act 1990 stipulates what can constitute a statutory nuisance. This includes smoke from premises, except private dwellings in SCAs which are exempt. The amendment of the 1990 Act by this Act removes this exemption in England so that a local authority will be able to pursue somebody who emits smoke from private dwellings in SCAs where it is prejudicial to human health or causing a nuisance.

Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer (11/04/24).

### **8.3 EQUALITIES IMPLICATIONS**

8.3.1 Under the Public Sector Equality Duty of the Equality Act 2010, decision makers must evidence consideration of any potential impacts of proposals on groups who share the protected characteristics, before decisions are taken.

8.3.2 By law, assessments must be carried out throughout planning and delivery and contain sufficient information to enable the local authority to show it has paid 'due regard' to the equality's duties; and identified methods for mitigating or avoiding adverse impact on people sharing protected characteristics.

8.3.3 The Air Quality Delivery Plan 2024-2029 requires the Council to take positive steps to tackle the effects of poor air quality in the borough. The measures to be taken will have a positive impact on all communities and there is no group with a protected characteristic that will be negatively impacted by the actions in the plan.

8.3.4 The EQIA undertaken has identified no direct or indirect negative impact on protected groups.

Comments approved by: Helen Reeves, Head of Strategy & Policy (27 March 2024).

### **8.4 ENVIRONMENTAL IMPLICATIONS**

- The Council has a commitment to address environmental sustainability as an integral part of all activity.
- The Air Quality Delivery Plan matrix includes quantification, where possible, of the improvement to air quality that each measure, proposed or implemented, is expected to have over time, with a clear date for meeting this target.
- All actions are expected to have a beneficial impact on Croydon's air quality
- None of the actions are expected to have any negative environmental impact. It is expected that many of the actions will have a positive impact on improving air quality.
- In some cases it may be difficult to quantify the impact that certain measures have. For example, it is likely that it will not be possible to calculate the impact on concentrations of PM<sub>10</sub> and NO<sub>2</sub> that a permitting scheme to encourage low emission vehicles will have, but the definition of low emission vehicle that is used (relevant Euro standards, for example) and the number of permits issued will be useful information to include.

## **8.5 RISK IMPLICATIONS**

8.5.1 There is a risk that if the recommendations in this report are not approved and the Air Quality Delivery Plan 2024-2029 subsequently adopted, action to tackle poor air quality in the borough will not progress at the pace it is required to thus the council may not meet its statutory duties.

## **8.6 DATA PROTECTION IMPLICATIONS**

8.6.1 This report will not involve the processing of personal data.

8.6.2 The Director of Streets & Environment comments that agreeing the recommendations in this report will not result in the processing of personal data.

8.6.3 Approved by: Karen Agbabiaka, Director of Streets and Environment (27 March 2024).

## **9. APPENDICES**

Appendix 1: Draft Air Quality Delivery Plan 2024-2029

Appendix 2: Equality Analysis Form

## **10. BACKGROUND DOCUMENTS**

None.