



Department  
for Environment  
Food & Rural Affairs

# Air Quality Strategy

Consultation on the framework for local authority  
delivery

Summary of responses and government response

Date: April 2023

We are the Department for Environment, Food and Rural Affairs. We're responsible for improving and protecting the environment, growing the green economy, sustaining thriving rural communities and supporting our world-class food, farming and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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# Introduction

This air quality strategy sets a framework to enable local authorities to deliver for their communities and contribute to our long-term air quality goals, including new targets for fine particulate matter (PM<sub>2.5</sub>). It fulfils the statutory requirement under the Environment Act 1995 as amended by the Environment Act 2021 to publish an air quality strategy setting out air quality standards, objectives, and measures for improving ambient air quality.

This strategy represents a departure in approach from previous strategies produced under the Environment Act 1995. In its focus on local authorities and bringing together existing requirements and duties. It builds on the Environment Improvement Plan and aims to drive greater improvements in air quality at the local level. It will be supplemented by additional consultations and guidance where necessary and will be reviewed on a 5-yearly basis.

All local authorities in England, including upper tier authorities (where they exist) and those in London, must have regard to the Air Quality Strategy and its contents. This reflects the fact that in areas that have both district and county councils, the air quality duties sit with the district council and county councils have a duty to contribute improvement to air quality where relevant. In unitary areas, the single authority holds responsibility. We expect this strategy to be relevant where local authorities are preparing Air Quality Action Plans to address local exceedances of concentration limits for air pollutants. Last year, we expanded the duty to have regard to this strategy to National Highways.

The consultation was launched on the 11 April 2023 and ran for 10 days, closing on 21 April 2023.

The consultation received 434 responses, 376 online responses through Citizen Space and a further 58 responses by email.

This document summarises the responses received and how the government will take forward the strategy in light of these responses.

## Consultation publication

Local authorities were contacted directly and informed of the consultation. A [news story](#) was published on GOV.UK and issued to national and trade media. The consultation was highlighted by a range of outlets including Air Quality News and Rural Services Network. The consultation was also referenced in range of stakeholder bulletins, including:

- the Environment Agency bulletin
- the Department for Levelling Up, Housing and Communities bulletin
- the Environmental Improvement Plan newsletter

Of the 434 responses:

- 97 were from local government

- 160 were from individuals
- 18 were from community groups
- 9 were from academic or research institutions
- 114 were from businesses
- 5 were from health bodies
- 29 were from a non-governmental organisations
- 3 responses were received from other government organisations
- 1 response were from a parliamentarian

40 respondents did not answer this question.

## Responses to policy questions

This document highlights the main issues raised in response to questions 5 to 17 but does not comment on every response received. We have drawn on analysis of the consultation responses completed by the Department for Environment, Food and Rural Affairs (Defra).

We have considered all the responses to this consultation and have made changes to the Air Quality Strategy where appropriate. Substantive changes are set out in our government response in this document.

### Question 5: air quality reporting zones

**Question 5 was: To what extent do you agree or disagree with our commitment to better align air quality reporting zones with local government boundaries?**

Of the 376 responses submitted through Citizen Space, 368 answered this question and 104 provided further detail. Some email responses also referred to this issue.

Of the Citizen Space respondents who expressed an opinion on the realignment of zones and agglomerations to local authority boundaries, a large minority (42%) were in favour of realignment. The main reasons provided were to simplify the system and increase accountability. A number of responses sent by email expressed support for zone realignment. One suggested it would facilitate coordinated action across local authority boundaries and improve the usability of data to allow for an evidence-based approach to tackling poor air quality.

Those against realignment (28% of Citizen Space responses) cited the large cost including in relation to monitoring, felt there was no reason for doing this as air pollution reduction should be controlled centrally, or suggested resources would be more effectively spent addressing the sources of emissions.

A small number of respondents felt that zones should be abolished altogether. Of those that were neither positive or negative, 23% were neutral and 6% expressed no opinion.

## Government response

The strategy reiterates the commitment in the Environmental Improvement Plan to re-align air quality zones with local government boundaries. The government will continue to take this forward to drive effective coordinated action, whilst seeking to maintain the scientific integrity and robustness of the measurement networks.

While we recognise the concerns raised around the costs, we consider re-alignment will make it easier for local authorities to identify their role in addressing areas of non-compliance which are monitored under England's Air Quality Standards Regulations 2010. Re-aligning air quality zones with local government boundaries will support local authorities in delivering localised solutions as key delivery partners in meeting our legal limits and targets.

## Question 6: domestic burning

**Question 6 was: Are there additional local or national actions or powers that you think could be taken to support work on domestic burning?**

Of the 376 responses submitted through Citizen Space, 330 answered this question. Some of the responses submitted via email also referred to this issue. 54% of Citizen Space respondents were in favour of the proposed action on domestic burning. 28% stressed the need for increased awareness raising including on best practice and the health risks of burning. A number of those who responded over email also called for greater action on domestic burning, including:

- asking for enhanced communication assets for local authorities
- greater awareness raising on smoke control areas
- standard enforcement templates for local authorities

Over a fifth (21%) of Citizen Space respondents suggested policy changes such as:

- changes to garden waste collection
- mandatory annual sweeping of chimneys
- enhanced local authority powers of investigation

Suggestions made by email included mandatory electrostatic particulate filters for existing and newly fitted wood-burning stoves or enhanced planning controls for wood burning stoves. 18% of Citizen Space respondents raised the need for increased enforcement of current legislation, with one suggesting on-the-spot fines. 12% suggested that local authorities require more funding to take effective action on domestic burning.

There was a mix of opinions on whether reducing emissions of air pollutants was primarily for local or central government, with many respondents pointing out that both had a role to play.

## Government response

The government is committed to driving down the emissions impact of domestic combustion and committed to a number of actions in the Environmental Improvement Plan and strategy to achieve this. We appreciate the central role of local authorities and will be supporting them in making best use of their existing powers through updated guidance, templates and information.

We are also committed to developing a further communications campaign to support the public and local authorities in reducing the impact of domestic combustion. The information provided in response to the consultation will be taken into consideration as we develop our communications approach. We will publish a best practice guide to help reduce emissions from outdoor burning. We have already published guidance on enforcement of smoke nuisance. We will highlight this to local authorities and provide further resources and training.

We are not considering a ban on domestic burning in England. The government recognises that some households are reliant on solid fuel burning as a primary source for heating, hot water and cooking, with this in mind the government is not seeking to ban burning. This is particularly pertinent in light of the current focus on energy security, and the global rise in energy prices.

## Question 7: industry

### **Question 7 was: How do you feel local authorities can most effectively reduce pollution from industrial sources they are responsible for?**

Of the 376 responses submitted through Citizen Space, 273 responded to this question. Some responses received via email also referred to this issue. 40% of total respondents commented on the specific proposals in the draft Air Quality Strategy. The majority of them responded positively (69%), whilst some responded negatively (11%) or were neutral (1%). Respondents also put forward specific suggestions for how local authorities can most effectively reduce pollution from industrial sources they are responsible for regulating.

16% of total respondents cited local authorities' funding and resourcing as key factors in effectively reducing pollution from industry with several responses noting levels of fees and charges do not reflect the work involved, limiting local authorities' capacity to inspect and regulate sites. Some respondents (18%) noted the importance of monitoring and reporting with many suggesting digital solutions. Some respondents (8%) highlighted information sharing and education as important ways of reducing pollution, including providing information to industry of relevant schemes, and dissemination of good practice.

Some respondents (53% of those that responded to specific draft Air Quality Strategy proposals) noted that the regulations and standards should go further to raise standards or

broaden the regulatory regime. A few respondents called for bans on either general industry or specific types of industry. Other respondents highlighted:

- the impact on sensitive receptors
- people with protected characteristics (such as people in hospitals and schools)
- health inequalities

We will take these into account in our policy development. Several responses noted the Environment Agency's role, including how better information sharing and working together on local air quality issues could support local authorities.

A few respondents noted the importance of balancing measures, ambition, or additional requirements on industry with economic and social consequences. Some respondents were unsupportive of the policy of reducing pollution.

## Government response

The most commonly raised themes from the consultation responses will be addressed through our delivery of commitments in the Air Quality Strategy and Environmental Improvement Plan. We will consult on improvements to the regulatory framework for industrial emissions, including creating a Best Available Techniques (BAT) approach for smaller industrial installations, which will strengthen the regulatory regime. The BAT process provides a collaborative framework for regulators and industry to agree integrated standards to control industrial emissions with long implementation times which support business investment, including for SMEs.

We committed in the draft Air Quality Strategy to consider how to boost local authority regulatory capacity and capability, including exploring how the fees and charges system can be improved to provide better cost recovery. This will strengthen funding and resourcing for local authorities in the delivery of industrial emissions regulation. Additionally, as we develop web services for air quality, we will consider the points made around monitoring and reporting.

## Question 8: transport and NRMM

**Question 8 was: How do you feel local authorities can most effectively reduce pollution from transport and non-road mobile machinery (NRMM)?**

Of the 376 responses submitted through Citizen Space, 281 answered this question. Some responses provided by email also addressed this issue.

The majority (54%) of Citizen Space respondents suggested there were positive actions local authorities can take to reduce pollution from transport sources, with most referring to powers outlined in the strategy summary of transport powers. These include:

- improvements to public transport

- encouraging active travel including improved cycle lanes
- implementing low traffic neighbourhoods (traffic calming measures) or charging zones

Suggestions made by respondents who replied by email included more streamlined working with the logistics industry and local authorities and increasing the proportion of journeys using active travel or public transport. One respondent noted the impact of poorly maintained pavements on people with disabilities.

A small minority (16%) of Citizen Space respondents expressed opposition to any policies that restrict road vehicles or place new burdens on motorists. Some responses argued for action to improve traffic flow thus reducing congestion for instance - by widening roads or building by-passes.

A few respondents felt that local authorities were not best placed to reduce pollution from transport, seeing intervention as either unnecessary or best placed with central government. Some respondents urged for more central government support for local authorities or actions which are existing central government policy, such as phasing out the most polluting vehicles. One response suggested the strategy should include a commitment to consider the impact on air quality within the future Road Investment Strategy.

In addition, a number of responses received both through Citizen Space and by email suggested restrictions on Non-Road Mobile Machinery (NRMM), including allowing local authorities and Metro Mayors to require only newer, cleaner plant machinery to be used.

## **Government response**

While the majority who responded favoured local authority intervention, the responses also reflected divided opinion in communities over local interventions to reduce pollution from road vehicles. We therefore consider it right that local councils are generally best placed to determine the best local interventions in the context of the local area and in full consultation with the local community, including in relation to NRMM. Central government will continue to provide support for local authorities in the form of guidance, including highlighting best practice case studies and additional financial assistance in the form of targeted grants or funding where appropriate.

We recognise that there will be additional interventions available to local authorities complementing those summarised in the strategy as reflected in some of the consultation responses (for example car parking charges). Such interventions may be appropriate in some local contexts and with due consideration of the impact on protected characteristics. However, we consider it appropriate that the strategy summarises the interventions that are broadly appropriate rather than seek to detail all potential local interventions.

The current [Road Investment Strategy \(RIS2 2020 to 2025\)](#) includes clear commitments to deliver better environmental outcomes including reducing air pollution. We will in addition



include a commitment in the strategy that the next Road Investment Strategy (RIS3 2026 to 2030) will continue to take impacts on air quality into consideration.

The government will continue to explore ways to reduce emissions from non-road mobile machinery, including through wider central government decarbonisation initiatives.

## Question 9: agriculture

### **Question 9 was: How do you feel local authorities can most effectively reduce pollution from agriculture?**

Of the 376 responses submitted through Citizen Space, 208 answered this question. Some letters also referred to this issue. Of relevant replies received, most respondents indicated support for intervention in agriculture. However, concerns were raised over whether local authorities were the correct body to intervene, and local authority powers, knowledge, and resource were highlighted as potential barriers. Some respondents indicated central government, or the Environment Agency may be better placed to intervene, some indicated a joined-up approach between government bodies and key industry stakeholders was required. Several emphasised the importance of engaging with farmers and raising awareness of ammonia and agricultural pollution. Also highlighted were the importance of cross-boundary cooperation to reduce emissions from agriculture and of collaborative working between local authorities and the farming industry.

Many respondents supported further regulation (21%), and monitoring and enforcement (23%) in the sector, with some responses emphasising the role of the planning system or environmental permitting. However, some respondents thought intervention was unnecessary and highlighted a potential negative impact on food security.

Several respondents suggested further action around the management and reduction of chemicals and fertilisers (14%), and to encourage farming practices such as rewilding, and improvement of biodiversity (18%). Some supported management of slurry, manure and agriculture machinery to reduce emissions, the prevention or reduction of agricultural burning, and encouraging the public towards a more plant-based diet. Management of hedges and trees as buffer strips was suggested as a potential solution to surface run off, but the preference was towards preventative measures. Concerns over the impact of ammonia on sensitive plant life, and water courses was noted.

### **Government response**

Reflecting the commitments in the Environmental Improvement Plan, the strategy set out our intention to consult on bringing dairy and intensive beef farms within scope of environmental permitting. It also set out our intention to consult on new rules to reduce ammonia emissions from organic manure, including requirements for low emission techniques for slurry and digestate spreading and storage. We will continue to take this forward and will publish further details later in 2023.

We will continue to issue funding to invest in slurry storage infrastructure to reduce ammonia emissions, with an increased budget of £33.9 million made available in 2023 and two further rounds to follow.

Concerns over local authority involvement will be considered. Local authorities should continue to encourage tenant and other farmers to reduce ammonia emissions by following the Code of Good Agricultural Practice for Reducing Ammonia Emissions and the impact of ammonia should be considered as part of local planning policies and decision-making.

## Question 10: indoor air quality

**Question 10 was: How do you feel local authorities can most effectively improve indoor air quality?**

Of the 376 responses submitted through Citizen Space, 308 answered this question. Some responses provided by email also referred to this issue.

41% of respondents via Citizen Space who answered this question supported action being taken to improve indoor air quality although a much smaller proportion explicitly stated that this was the responsibility of local authorities (10%). A similar number of respondents (9%) suggested that national government was best placed to address indoor air quality. A sizeable minority of respondents (11%) thought either that indoor air quality was the responsibility of the individual or nothing should be done on this issue.

Some respondents via Citizen Space and email suggested that more needed to be done to understand the scale and extent of the issue, including through more monitoring (5% of Citizen Space responses) or greater research (3% Citizen Space responses). Some email respondents suggested that the government should monitor air quality in public buildings.

In terms of solutions to improve indoor air quality, a significant minority of Citizen Space responses (31%) emphasised that more needed to be done to raise awareness of indoor air quality. They also emphasised the importance of highlighting steps that the public can take to reduce their exposure to a range of harmful pollutants indoors, including mould, cleaning products and scented products. A significant minority of respondents (16%) support improving ventilation in buildings, while 15% also mentioned the need for stricter building standards, citing concerns about airtightness in new builds. 7% support more action to reduce mould and damp. 9% of respondents raised solutions to reduce the impact of indoor burning. Responses noted the need for close links with public health and social services professionals, the importance of the planning process in reducing harmful pollutants, and the role of national and local government in both setting updated standards and better enforcement of existing standards.

## Government response

The inclusion of indoor air quality in the strategy for the first time reflects the recognition of the impact that poor air quality can have on health, given the proportion of time the average person spends indoors. Indoor air quality was also addressed in our 2019 Clean Air Strategy. The government accepts that there is a role at both the national and local level to prevent and reduce indoor air pollution, as well as individual action with simple steps such as ventilation in the home.

The action we are taking across sectors to reduce emissions outdoors will have an impact on the air quality indoors by reducing the transfer of outdoor pollutants indoors. The government is also taking steps to review and update guidance where necessary, including in relation to the health impacts of damp and mould in homes.

Given the varied and complex set of factors which impact on indoor air quality, it is clear that many messengers have the opportunity to engage with individuals and can help improve our indoor environments. We consider frontline professionals (such as health or social services), including those employed by local authorities, to be well placed to provide personalised advice to individuals on reducing their exposure. Defra has already funded a series of pilot projects that investigate how health professionals can be trained to effectively deliver air quality information to patients and carers, through a 'Clean Air Champions' model. As part of the latest pilot project an indoor air pollution messaging matrix was developed to provide information about the sources of, and actions to avoid, indoor air pollution and was included in the training sessions and patient leaflets.

## Question 11: air quality information

**Question 11 was: How do you feel local authorities can most effectively communicate air quality information?**

Of the 376 responses submitted through Citizen Space, 308 answered this question. Some responses provided over email also referred to this issue.

Of the responses given to this question through Citizen Space the majority (81%) accepted the premise that local authorities have a role to play in communicating air quality information to the public and made suggestions for how this can be done more effectively. Among the most frequently cited ideas were better use of digital communication channels such as social media and local websites (44% of Citizen Space respondents) – and greater collaboration with residents, experts, local news providers, health care providers and educational institutions (32% of Citizen Space respondents).

19% of Citizen Space responses also emphasised the theme of improving the message content and credibility. The need to evidence the scientific integrity of air quality messages and data was raised by numerous respondents, with some questioning the validity of existing information sources. Greater transparency of local monitoring data, with increased monitoring and real time data being publicly displayed were common suggestions to

mitigate this. Some respondents thought contextualising this data based on new World Health Organisation (WHO) guidelines could make this more meaningful for the public.

Amongst the 13% of Citizen Space respondents who disagreed that local authorities should be providing air quality information, several suggested that the money spent on communications could be put to better use. There were also concerns about the trustworthiness of information provision. A number of respondents considered that responsibility for air quality information provision sits primarily or wholly with central government or Defra, rather than local authorities.

## Government response

The government will continue to support local authorities in effectively communicating with the public on air quality. We already make a wide range of information available to the public through the [UK-Air website](#) and [Twitter account](#). This includes forecasting, the latest local measurements from our nationwide monitoring networks, and health advice informed by the work of the Committee on the Medical Effects of Air Pollutants.

The government is undertaking a comprehensive review of how we communicate air quality information to ensure that members of the public, and vulnerable groups, have the information they need protect themselves and understand their impact. The responses received as part of this consultation will inform part of the review. We have continued our targeted communications campaign to promote best practice in the use of wood stoves and fireplaces and will be publishing outdoor burning best practice guidance this year. We will share the assets and learning created as part of these initiatives with local authorities.

## Question 12: local authority powers

**Question 12 was: Do you feel that there are additional powers relating to air quality which should be available to local authorities?**

The responses to this question were:

- Yes (41%)
- No (48%)

Of the 376 responses submitted through Citizen Space, 329 answered this question, with 41% responding 'Yes' and 48% responding 'No'. 199 respondents provided further detail. Some responses provided over email also provided relevant information on this issue.

Some of the respondents who did not think that local authorities should have additional powers suggested that local authorities already had sufficient powers, that existing powers were sometimes used inappropriately, or that existing powers should be repealed or simplified before additional powers were added. Of those who provided further detail on Citizen Space, 35% suggested that local authorities should use or enforce their existing powers across a range of areas more effectively. A smaller number of responses also suggested that greater local authority training was need.

Responses to this question attracted views on a range of topics. This included wanting greater local authority action on domestic combustion (25%) and suggesting local authority funding and staff resources were constraining their ability to effectively enforce or use existing powers (16%). Issues raised by a smaller number of respondents on Citizen Space included local authority training, action being required at central level, traffic restrictions, anti-idling legislation and nuisance legislation.

A number of responses, including several letters, raised the possibility of putting local air quality strategies on a statutory footing, requiring all local authorities to prepare one.

## **Government response**

The government agrees that there is a role for national as well as local government in addressing poor air quality, which is why we have set out our framework of action in the clean air chapter in the Environmental Improvement Plan. Respondents to this question were almost evenly split on the question of whether local authorities should have additional powers related to air quality. However, a strong theme running through all responses is that local authorities should be equipped to make best use of and enforce existing legislation.

In the Environmental Improvement Plan, and as set out in chapter 3.4 of the strategy, the government is committed to undertaking an audit of local authority powers. Reflecting the responses to this consultation, the first part of this review will involve ensuring that local authorities have the guidance and materials to allow them to make best use of the powers they already have. This will ensure that we are better able to differentiate true regulatory gaps from implementation challenges and avoid unnecessary additional regulation.

We do not consider it currently necessary to put local air quality strategies on a statutory footing, though we will continue to keep the role of local authorities under review.

## **Question 13: local authority support**

**Question 13 was: What further support could government provide to help with actions taken locally to tackle air quality?**

Respondents could select more than one answer. The responses provided were:

- increased guidance (54%)
- other (56%)
- knowledge hub including assets for local authorities (45%)
- sharing space or website for best practice examples of local working (45%)
- enforcement pro-formas or templates (37%)
- virtual teach-ins on topics (36%)
- face to face teach-ins on topics (30%)

Of the 376 respondents on Citizen Space, 344 submitted an answer to this question. Some responses provided over email also referred to this question.

Of the 344 responses, a significant proportion supported all of the proposed types of support. The most popular was increased guidance (54% of respondents). This was followed by a knowledge hub including assets for local authorities (45%), sharing space for best practice examples of local authority working (45%), enforcement pro-formas or templates (37%), virtual teach ins (36%) and face to face teach ins (30%).

A majority of Citizen Space respondents also selected “other” in response to this question. The most frequently raised issues by the 234 respondents who provided additional detail were increased local authority funding or resourcing (28%). Some respondents (12%) also pointed to a need for more training for local authority staff. A number of respondents suggested that the emphasis should be on awareness raising and information sharing (21%) and not necessarily enforcement, while one respondent raised the possibility of a national air quality conference.

A small number of responses suggested policies for national government to implement, for instance around:

- public transport
- electric vehicle infrastructure
- energy sources and energy efficiency

## **Government response**

The responses to this question suggest that there is appetite for a range of different support from central government for local authorities in using their powers. We are particularly grateful for the responses which provided further detail on the types of material which would be most welcomed. Over the coming months, Defra intends to roll out a programme of support for local authorities to enable them to make the best use of their resources and powers. We will continue to provide additional funding to local authorities through our Air Quality Grant and for additional burdens imposed by recent regulation, including the provisions of the Environment Act 2021 relating to smoke control areas and enforcement on burning as a nuisance. We also intend to hold a local authority symposium in the 2023 to 24 financial year to bring together local authority representatives to share best practice and learning.

## **Questions 14, 15 and 16: PM<sub>2.5</sub> target implementation**

**Question 14 was: To what extent do you agree or disagree that a new approach needs to be employed to promote consideration of the PM<sub>2.5</sub> targets in the planning system?**

Of the 354 Citizen Space respondents, a majority (55%) of respondents agreed that a new approach to include a consideration for the PM<sub>2.5</sub> targets within the planning system is

needed. This issue was also referred to by respondents who provided responses by email. A number of Citizen Space respondents commented that inclusion in planning was an important part of delivering the targets and addressing poor air quality. Those that disagreed a new approach was needed (33%) cited the cost of planning reforms, the already high burden on local authorities or believed that the current legislation was sufficient. A common theme of responses (either positive or negative) across questions 14, 15 and 16 was the need for more detail about the proposals including how the changes would be implemented.

**Question 15 was: What do you think are the merits or drawbacks of a design-stage emission prevention approach as set out in this chapter?**

Of the 248 that provided a response through Citizen Space on early design stage mitigation, 46% were in favour of the approach. This issue was also referred to by respondents who provided responses by email. There were comments that whilst more detail was needed, in principle, this approach would be more effective than the current approach and that there were greater opportunities to implement measures at an early stage. Those against the approach suggested it could be overly costly or burdensome to implement (19% of Citizen Space respondents), or that existing assessment methods were sufficient. In general (positive and negative) points were made about the importance of how this is implemented (21%) and the need for more detail and further consultation (12%).

**Question 16 was: Are there any additional assessment approaches or points we should consider when developing proposals to integrate the PM<sub>2.5</sub> targets in the planning system?**

Responses to this question (186) raised points about the need for associated data, tools as well as modelling and monitoring data as part of the guidance and the potential resource burden and training needs for local authorities to implement effectively (20% of Citizen Space responses). Again, points were raised about cumulative impacts and how these will impact exposure, inequalities, vulnerable groups (12%). Respondents raised the need to address emissions from wider sources (wood burning, traffic, NRMM, construction activities etc) (18%). Some additional wider points were made about best practice and consumer choice, particularly with regards to fuel security (8%). In addition, a number of responses felt that the targets set were not ambitious enough (6%).

**Government response to questions 14, 15 and 16**

As questions 14, 15 and 16 are closely connected, one government response is provided for all three questions.

The government plans to explore options to incorporate PM<sub>2.5</sub> targets into the planning system based on a design-stage emission prevention approach. The government believes that a reformed, streamlined system of environmental assessment will ensure that decision-makers are better equipped with the information and tools they need to make informed planning decisions that support sustainable development.

We acknowledge the concerns raised around the costs of planning reforms and potential burden on local authorities. However, the government believes that these changes are necessary to meet the PM<sub>2.5</sub> targets and protect people's health. We intend changes to environmental assessment will reduce the current burden of assessment by learning from the experience of the past 40 years to tailor assessment to better reflect the current pressures on the environment and development needs.

The government will take account of the range of issues raised, including the capability and capacity of local planning authorities, whilst considering and developing approaches to integrate the PM<sub>2.5</sub> targets in the planning system as well as looking at how the targets are integrated outside of the planning system. Further stakeholder engagement will be sought through the process of developing more detailed approaches. We will develop and consult on approaches towards quantitative assessment including low emission benchmarks.

## Question 17: feedback on consultation tool

**Question 17 was: Overall, how satisfied are you with our online consultation tool? Please give us any comments you have on the tool, including suggestions on how we could improve it.**

Of the 376 responses submitted through Citizen Space, all 376 answered this question.

Of those who indicated a preference, 31% said they were "Satisfied" or "Very Satisfied", with 34% saying they were "Dissatisfied" or "Very dissatisfied". 208 respondents provided further detail, of whom 64% stated that the consultation timing was too short and 14% thought that it was not publicised enough to allow wider and more detailed responses. Of the 208 respondents, 18% suggested that the consultation questions were biased towards a certain outcome or view.

15% of those who provided further detail commented on the consultation tool, the majority were positive and found the tool easy to use and that it worked well. There were some suggestions on how the tool could be improved including providing a way to comment on the Air Quality Strategy as a whole and being able to include references/footnotes as part of a response.

### Government response

Much of the response to this question regarded timing. On the tool itself, we were pleased that the majority of responses were positive.



## Additional points raised in the consultation

Several respondents made points not related to the above questions or which were relevant to several questions. This included:

- the reduced consultation period limited the ability to stakeholders to respond to the consultation
- requests for further guidance or detail in specific areas, for instance on awareness raising campaigns around domestic combustion, further detail on transport interventions, wider approaches to reducing emissions from farming
- requests for the strategy to be reviewed frequently
- points relating to the equalities impacts of specific policies referred to in the strategy

### Consultation timing

We published the consultation on the draft Air Quality Strategy as soon as possible after the national delivery pathways towards our targets were set out in the Environmental Improvement Plan at the end of January, our new PM<sub>2.5</sub> targets were set in law at the end of January and the National Air Pollution Control Programme was published in February. We are required by law to publish the strategy by 30 April 2023.

We recognise the time pressure the reduced consultation period has put on local authorities and other interested stakeholders. However, given the concise nature of the document and the separate engagement that has gone into many of the policies within it, we consider the consultation timeframe to be proportionate. We have analysed the responses received to the consultation to ensure the strategy is both a useful and functional document for improving the air we breathe.

### Requests for further detail

We appreciate the desire for more detail from the government on most aspects of the strategy. However, it would not be appropriate for the document to contain exhaustive detail on each policy referred to as this would detract from its intended role as a strategic framework to drive action by delivery partners. The government has published detailed guidance on many areas relevant to the content of this strategy, much of which has only recently been updated following legislative changes made through the Environment Act 2021.

### Further reviews of the Air Quality Strategy

In line with the requirements of the Environment Act 1995, as amended by the Environment Act 2021, the government must review the strategy within 5 years of its previous publication.

### Public Sector Equality Duty

In preparing the strategy and this government response, the public sector equality duty has been considered. As set out in the strategy, air quality interventions should be designed in a way which take into account the disparities in exposure to and impacts from

poor air quality. This may be of relevance to certain protected characteristics, including age, disability and pregnancy. As the strategy provides a framework for action rather than new policies, detailed consideration of the public sector equality duty should be undertaken by local and central government as part of the development and implementation of individual policies.

## Annex A: List of organisations

The following organisations responded to the consultation (the list does not include individuals or those that requested their response be treated in confidence).

- ADPH
- Adur & Worthing Councils
- Air pollution services
- Air Quality Data Management (AQDM)
- AJ Wells and Sons Ltd
- All Morays Chimneys
- Atkins Ltd
- Barnsley MBC
- Barts Health NHS
- Basingstoke and Deane BC
- Bath and North East Somerset Council
- BESA
- BFCMA
- Biofuelwatch
- Birmingham City Council
- Blaby District Council
- Bloomsbury Air
- Borough Council of King's Lynn and West Norfolk
- Bradford Council
- Braintree Council
- Bristol City Council
- Bristol Clean Air Alliance
- Buckinghamshire Council
- C Forster chimney sweeps
- Calon Lân Ltd
- Cambridge City Council
- Camden council
- Campaign for better transport
- Canterbury City Council
- Caroline Lucas MP
- Centre for Health Services Studies, University of Kent
- Centre for Mental Health
- Charlton & Jenrick Ltd
- Cheshire West and Chester Council
- Chideock Parish Council
- Chimney Skills Training Ltd
- Chimney sweeps Somerset
- Chorley Council
- CIEH, ADPH, ADEPT
- City of London Corporation
- Clean & Go - Chimney Sweeping
- Clean Air for Henley
- Clean Air in London

- Clean Air Nottingham
- Cleaner Chimneys Chimney Sweeps
- Client Earth
- Climate action Plymouth
- Clocaenog Chimney Sweep
- Coal Merchants Federation
- Construction Equipment Association
- Construction Plant Hire association
- Country Land and Business Association (CLA)
- CPL Industries
- Croyde Chimney Sweepers
- Cycle Sprog
- Dacorum Borough Council
- DAERA
- Devon County Council
- District Councils Network
- Doctors and Scientists against Wood Smoke Pollution
- Dorset Council
- Dudley MBC
- East Lindsey District Council
- East Suffolk Council
- Elmbridge Borough Council -Planning and Environmental Health
- Energy UK
- Environmental Protection UK
- Epping Forest District Council
- Essex County Council
- Faculty of Public Health
- Federation of British Chimney Sweeps
- Fire Surround Installations
- Flamingrate heating centre
- GLA
- Goodfires Chimney Sweeping Ltd
- Great Yarmouth Borough Council
- Green Sweeps
- GreenTECH by AQUAcell
- Hackney Council
- Harborough District Council
- Haringey Council
- Hennock Int Ltd
- Hereford chimney sweeps
- Hertfordshire and Bedfordshire and Neighbouring Authorities Air Quality Forum
- Hertsmere Borough Council
- HETAS
- HEVAC, a FETA association
- Home sweep home Ltd
- Horsham District Council
- IAQM
- ICPR 1200 Limited

- ICS
- Impact on urban health
- Imperial College London
- Independent Environmental Consultant
- Institute of Public Health (NI and Ire)
- IPS (iow) Ltd
- Islington Clean Air Parents
- JEEPERS SWEEPERS
- JL Wight Chimney Sweeps
- Keep Southwater Green
- Kingston upon Hull City Council
- Kirklees Council
- Knowsley Council
- Lancashire Air Quality Group
- Leeds City Council
- Leicester City Council
- Lewisham Council
- LGA
- Liverpool City Council
- Liverpool City Region Combined Authority
- Logistics UK
- London Borough of Bromley
- London Borough of Camden
- London Borough of Merton
- London Borough of Newham
- London Borough of Waltham Forest
- London Councils
- Lynsted with Kingsdown Parish Council
- Milton Keynes City Council
- Mineral Products Association Ltd
- Mr Soot Chimney Sweep
- Mums for Lungs
- National Energy Action
- National Farmers Union
- Natural England
- Norfolk County Council
- North West leicestershire district council
- North Yorkshire Council
- Norwich City Council
- Nottingham City Council
- Nuneaton and Bedworth Borough Council
- Office of Environmental Protection
- OneUK
- Oxbow Coal Limited
- Oxford City Council
- PA BUSINESS SERVICES
- Personal Protection Inc
- Plantlife
- Policy Connect on behalf of APPG on Carbon Monoxide

- Pollution Solution - Roadvent.com
- RAC Foundation
- Rail Safety and Standards Board
- RD Jaggard and son
- Reading Borough Council
- Redcar and Cleveland Borough Council
- Regulatory Services Partnership, Merton, Richmond and Wandsworth Councils
- RJL Chimneys Ltd
- Road Haulage Association
- Royal Mail
- RPCC
- Safe Ed for All
- Salford City Council
- Sandwell MBC
- Save Greater Manchester's Green Belt
- Slough Borough Council
- Small Woods Association
- SMMT
- Solid Fuel Association
- Solihull MBC
- South Derbyshire District Council OBH Derbyshire Environmental Protection Group
- South Norfolk and Broadland Councils
- South Oxfordshire and Vale of White Horse District Councils
- Southampton City Council
- Southampton University
- Southwark Council
- Staffordshire County Council
- Stan the Sweep Ltd
- Stove Industry Association
- Suffolk County Council
- Sussex-air
- Sustrans
- Teign Sweep
- Teynham Parish Council
- Thames Crossing Action Group
- The Ella Roberta Family Foundation
- The Guild of Master Chimney Sweeps
- The Hammersmith Society
- The Purple Sweep Ltd
- The Real Product safety Guide
- The Sweep Master (Chimney Sweeping company)
- The Sweep Sittingbourne
- Thomas Welch & Sons. (Member of APICS).
- Tillington Parish Council
- Transition Exeter
- Tunbridge Wells Council on behalf of Mid Kent Environmental Health
- University of Birmingham

- University of Northampton
- University of Nottingham
- Volta Trucks
- Walking Pictures Ltd.
- Walsall Metropolitan Borough Council
- Wandsworth, Merton, Richmond joint response
- Warrington Borough Council
- Wates Group
- Well Seasoned Wood
- West Northants Council
- West Suffolk Council
- Westminster City Council
- Wigan Council
- Wirral Council
- Wolverhampton City Council
- Woodland Trust
- Woodsure
- Worcestershire Shared regulatory services
- Wyre Forest District Council