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# Horizon Scanning: Air Quality Policy

Policy developments and opportunities to engage

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# Horizon scanning: air policy

## Policy developments and opportunities to engage, April 2024

*This is a briefing paper on policy relating to air pollution and indoor and ambient air quality. In recent years, the importance of air pollution has been increasingly recognised, with a series of legislative and governance developments. As such, there are multiple opportunities for positive engagement with policy and decision makers.*

*The paper is intended for IAQM and IES members to encourage awareness of relevant policy issues, support horizon scanning for environmental professionals, and identify opportunities to engage with decision makers and the public on emerging issues linked to air pollution and the wider environmental sciences.*

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## 1. Specialism-specific relevance

This briefing is primarily written for an audience of air quality professionals. Other environmental specialisms which may be affected by the subject-matter of the briefing include:

- Built environment
- Climatology
- Environmental management
- Impact assessment
- Sustainability
- Transport

Ultimately, this subject is likely to affect any professional whose work concerns air quality, air pollution, or consenting and planning processes.

## Part I: Megatrends affecting policy

### 2. Clean Air

Recent years have seen a substantial increase in public and political interest in the notion of clean air. It remains a key theme of environmental legislation and policy, with successive commitments in the [Environment Act](#), the [Environmental Improvement Plan for England](#), and the [Clean Air Strategy](#).

#### Emissions trends for key pollutants

Trends for emissions of several pollutants are broadly improving, but significant challenges remain. National statistics demonstrate [mixed progress for trends in emissions](#) of key air pollutants between 2012 and 2022, with an increase in emissions of PM<sub>2.5</sub> from industrial combustion of biomass based-fuels, an increase in PM<sub>10</sub> from construction, and an increase in both from domestic combustion.

Annual emissions of ammonia have also increased for some sources, including non-manure digestate spreading, dairy cattle, and non-agricultural animals. NMVOCs emissions from food and beverages production have also increased.

For other sources of PM<sub>2.5</sub>, PM<sub>10</sub>, ammonia, and NMVOCs, as well as for many other key pollutants, trends have been broadly positive. Tighter emissions standards for petrol and diesel cars have been linked to a 49 per cent reduction in annual road transport emissions of nitrogen oxides and a 60 per cent reduction in annual road transport emissions of NMVOCs.

Sulphur dioxide and nitrogen oxides emissions also continue to decline in line with long-term trends. Internationally, the latest data on [air pollution in Europe](#) shows similar trends, with broad progress but some significant challenges remaining.

More information about the state of air quality in the UK is available in the [2022 Air Quality in the UK Report](#), [UK Air Quality Statistics](#), and the [Air Pollution Trends Report 2023](#).

#### Indoor air quality

Over recent years, the public profile of indoor air quality has risen considerably, partly due to the prominent [guidance on indoor air](#) produced by the IAQM and the long-term consequences of the COVID-19 pandemic highlighting the

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importance of indoor environments to health outcomes.

Specific regulation and monitoring for indoor air quality is still nascent compared to policy approaches to ambient air quality. Despite this, some causes of poor indoor air quality are subject to a degree of control at source, such as chemical products, domestic burning, and ventilation standards for new buildings.

The focus of further policy in this area may be to bring together different measures to ensure a strategic approach to the quality of indoor air.

In that context, air quality professionals have a key role to play in providing insights on governance gaps or the cumulative effects of indoor air pollution from different sources.

There is also still further work needed to fill evidence and monitoring gaps on certain emissions, as highlighted by the Air Quality Expert Group's [2022 report on indoor air quality](#).

### Legal challenges

The [Ella Kissi-Debrah case](#) has also brought the issue to the political sphere and reinvigorated legislative interest in air quality. Following the 2020 coroner's report that ruled that air pollution had made a material contribution to Ella's death, her mother, Rosamund Adoo-Kissi-Debrah, initiated legal proceedings against three government departments.

DEFRA, the Department for Transport, and the Department for Health and Social Care are all defendants, though the Mayor of London and Transport for London are no longer subject to the legal case, following a settlement that resulted in a [public acknowledgement and apology](#) by the Mayor.

The case has now begun in the High Court, and will likely continue throughout 2024.

### Clean Air Bill

Increased public interest has led to the submission of a [Clean Air \(Human Rights\) Bill](#), initially in the House of Lords, and now ready to be considered in the House of Commons.

The Bill received its first reading in the House of Commons in December 2022, when it was formally presented to the House, though it has not yet been scheduled for its first substantive debate among Members of Parliament. It is unlikely to be debated in full before the next UK general election.

Further analysis on the Clean Air Bill is provided in the [previous version of this briefing](#), published in May 2023. Regardless of the success of the Clean Air Bill in this instance, the legislative discussions focused on the Bill may contribute to future efforts at legislating in this area, both by the current Government and by future administrations.

The role of air quality professionals in both legislative processes and the delivery of air quality in practice will continue to require effective engagement with developments to support an effective framework for the monitoring and governance of air quality.

## 3. Climate change

The UK [Net Zero Strategy](#) is the primary strategic roadmap for the UK's approach to climate change, bringing together all policies and proposals for UK decarbonisation commitments. It has a number of potential ramifications for air policy and the potential to secure co-benefits for air quality, including the Government's plans to promote active travel, decarbonise the transport sector, and increase agro-forestry.

There are also potential risks for air associated with the [current Net Zero Strategy](#), such as the transition to low carbon fuel production and the use of bio-energy, both of which may have unintended consequences for air quality.

The Strategy broadly identifies many of these challenges and notes the importance of preventing any negative consequences of the transition for air quality, mitigating the risks associated with the approach.

### Legal challenges to the Net Zero Strategy

In 2022, the High Court ruled that the UK's Net Zero Strategy was unlawful. The High Court determined that further details were required to meet the UK's obligations under the [Climate Change Act](#), as the Strategy lacked sufficient evidence of the measures which would limit UK emissions to the levels set out in the UK's [Sixth Carbon Budget](#).

In addition, a 5% shortfall was identified in the Strategy's reductions, so the Court also required the Government to give an explanation of the policies which would fill that gap. The Government was ordered to provide further plans, which were produced in an update to the Strategy in March 2023.

### Recent policy developments

Meanwhile, an independent '[Net Zero Review](#)' run by Chris Skidmore MP was commissioned with a specific mandate to determine whether the Government's approach to net zero is sufficiently pro-growth and pro-business. The Review reported back in 2023, identifying net zero as "*the economic opportunity of the 21st century*".

It set out 10 long-term missions to be completed by 2035 and 25 immediate actions to be completed by 2025, with a view to creating infrastructure and facilitating action by businesses and local government.

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Many of the recommendations were reflected in the March update to the Government's climate commitments. That update to the Strategy included a number of measures focused on delivery and energy policy, somewhat addressing the requirements of the Sixth Carbon Budget but not completely filling the gap.

In September 2023, the Government [provided a further update](#) to its approach to reaching net zero and altered a number of commitments, creating uncertainty for businesses and the public.

The new policy announcements included a delay to the ban of the sale of new petrol and diesel vehicles from 2030 to 2035, a reduced commitment on the phase-out of gas boilers, and an increased reliance on carbon capture, usage and storage (CCUS) without further details of how capacity will be scaled-up.

An increased reliance on CCUS could also introduce direct risks for air quality. Carbon capture facilities typically produce some amine emissions to air, including nitrosamine and nitramine.

These emissions tend to be small in scale, though careful foresight and evidence will be required to monitor any potential impacts associated with an increased reliance on CCUS as part of the UK's overall approach to climate change.

Full details on the Government's policy announcements are available in the recent [IES briefing on COP28](#).

### Linking climate and air quality strategies

Climate change and air quality have both seen significant policy activity in recent years, presenting many opportunities to promote cross-learning.

The IAQM Climate Change Working Group has produced insights on how to secure [mutually-beneficial outcomes](#) for the climate and air quality and what [air quality can learn from net zero](#).

Even as air quality professionals provide these leading insights to support a joined-up approach, further support is needed, particularly at the local level. Many local authorities face challenges for integrating climate strategies with air quality strategies, where the latter have historically been well-ingrained due to their statutory basis and the former are still relatively nascent.

Limited resources for local authorities often mean that work which affects climate change or air quality is not conducted by experts, in which context robust guidance plays an especially important role.

The [Environmental Policy Implementation Community \(EPIC\)](#) recently produced draft guidance for local authorities: [Integrated Action on Air Quality and Climate Change](#), which supports integrated approaches to local authorities' statutory duties on air quality and reducing greenhouse gas emissions.

See [Box 1 in the section on Local government and planning](#) for more information on EPIC and its links to the IAQM.

Recent developments on climate change are likely to lead to significant further discussion of the potential for co-benefits for air quality while addressing climate change, so there will be successive opportunities for air quality professionals to engage with policy developments from a systems perspective, helping to promote multiple benefits for air quality, the climate, and human health and wellbeing.



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### 4. Public engagement

While measures to improve air quality have become more widespread, increased politicisation and public opposition has created controversy over the implementation of some measures.

As a result, new approaches are being taken to implementing some policies to account for criticism. Controversy around the implementation of measures to improve air quality also highlights the importance of public engagement to promote an evidence-informed approach to policy making.

Recent controversy on Clean Air Zones, the expansion of London's Ultra-low Emissions Zone (ULEZ), and the 20mph speed limit in Wales have raised questions about the most appropriate way to balance the public's strong desire for environmental policies which protect human health with the need for a just and fair approach.

In some instances, this has led to uncertainty around policy approaches, such as Greater Manchester's decision to [no longer propose a Clean Air Zone](#) and pursue an alternative approach (see the [section on local government and planning](#) for more details). In other instances, public opinion has increased the politicisation of measures, raising questions about their wider application and the potential for policy reversals.

Regardless of the short-term uncertainty around these measures, recent controversies highlight the importance of public engagement on the reasons behind air quality measures and the ways they will be implemented.

For air quality professionals or local authorities seeking to employ these measures as mitigation strategies, it will be essential to consider public response as part of the wider challenges around the implementation of these policies.

Despite challenges, there are also recent case studies of good practice in public engagement around air quality policies, including DEFRA's [practical guidance on open fires and wood-burning stoves](#) published in October 2023 and the work of the [Met Office's Clean Air Programme](#) with [Global Action Plan](#) to produce resources for schools and the wider public. Both of these have facilitated an increased public engagement in the importance of air quality and implications of individual decisions.

### 5. UK General Election

The next UK General Election must be held by January 2025 and it is expected that it will take place before the end of 2024. As a result, it is likely that there will be substantial periods during the year without active policy development while the political process takes place.

During that process, air quality professionals will have a key role in remaining an objective source of information on air quality and its consequences for human health. As policy decisions linked to air quality become increasingly politicised, many professionals will need to manage the difficult balance between remaining politically-neutral while not compromising on the evidence underpinning urgent environmental action.

Regardless of the outcome of the next election, there will be significant changes to Parliament and the Government, with the latter facing a new or renewed mandate for action.

This presents a substantial window of opportunity for policy change that benefits air quality and the wider environment, so air quality professionals and other environmental scientists must be ready to provide the evidence and insights needed to support a positive direction for the next Government's policy.

### 6. Novel contaminants

Novel contaminants are receiving increasing interest globally and in the UK, with potential consequences for policy approaches to air quality as well as a wider set of environmental outcomes. In particular, [per-and polyfluoroalkyl substances \(PFAS\)](#) are emerging as a key focus on action on chemical substances. Similarly airborne microfibres have begun receiving greater attention in the UK.

While the contaminants underpinning these concerns are no longer 'emerging', policy responses remain highly emergent and uncertain. The vast differences between contaminants in the 'PFAS family' and the limited historic regulatory oversight means that this area of policy is underdeveloped compared to other areas of air quality policy, with a pressing need for regulation to catch up with scientific understandings.

These contaminants have the potential to be focus areas in the long-promised [UK Chemicals Strategy](#), which was due to be published in 2023.

Air quality professionals will play a key role in scrutinising the Strategy once it is released, to ensure that it will effectively address both the most concerning air pollutants, as well as these novel contaminants where regulation is not as well-established.



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### *Part II: Developments for policy and governance*

## 7. Air Quality Strategy and Clean Air Strategy for England

In early 2023, the Government published a consultation on revisions to the [Air Quality Strategy](#), particularly relating to the framework for local authority delivery. The revisions only relate to England, with the 2007 version of the Strategy still applying in Northern Ireland and Scotland, though the latter has made further updates to its approach (see the [section on Scotland](#) for more information).

By comparison, the [Clean Air Strategy](#), published in 2019, is a separate policy document developed to set out the Government's plans for addressing all forms of air pollution and reducing emissions in England, produced to meet the Government's responsibilities under the [National Emissions Ceiling Directive](#).

The two Strategies cover similar content, with the 2007 Air Quality Strategy now revised to bring it in line with the Clean Air Strategy, which reflects the Government's current approach. The Air Quality Strategy holds statutory importance as a result of the [Environment Act 1995](#). Both are politically important.

The consultation received criticism from professionals and NGOs due to the short window for responses, which was only 10 days. The Government stated that the contracted timeline was necessary to meet statutory obligations for the publication of the revised strategy, though many concerns remained that the narrow scope for responses could lead to a less effective strategy with unintended consequences.

Following the consultation, the Government [published the revised strategy](#) and its [response to the consultation](#). Much of the strategy reflects the approach taken in the 2019 Clean Air Strategy, with the most substantial revisions to the 2007 Strategy focusing on the delivery of air quality objectives by local authorities, including:

- Proposals to re-align air quality reporting zones with local authority boundaries;
- Support for local authorities in addressing domestic burning, primarily through best practice guidance and training resources, but with no outright ban on domestic burning;
- Reiteration of commitments made in the existing Strategy and in the [Environmental Improvement Plan](#) on industrial emissions, road transport, agriculture, and communicating air quality information (see the [section on the Environmental Improvement Plan](#) for further details);

- Reiteration of commitments to address PM<sub>2.5</sub> emissions through [reforms to Environmental Impact Assessment](#) and the planning system (see the [section on local government and planning](#) for further details);
- Recognition of the importance of indoor air quality, with current measures focused on providing citizens with information through health professionals;
- And a commitment to provide further support to local authorities so that they are able to use their powers to support air quality, primarily through [Air Quality Grants](#) and knowledge sharing.

The Clean Air Strategy and the revised Air Quality Strategy remain the most important policy documents for air quality in England, and their delivery through local authorities will be a key opportunity for air quality professionals to ensure that national targets are implemented in practice, setting the ground work for those targets to be exceeded, with the goal of closer alignment with WHO guidelines.

For further information on revisions to the Strategy, see the [response to the consultation from the IAQM](#), as well as the latest [House of Commons research briefing](#) on clean air policies throughout the UK.

## 8. Devolved administrations

Outside England, equivalents to the Clean Air Strategy are essential for progressing the goal of cleaner air quality across the UK. Each of the devolved administrations has a subtly different approach, all contributing to the UK's broader environmental objectives.

### Scotland

Compared to England and the other devolved administrations, Scotland has a more well-established approach to air quality.

Scotland's [second Air Quality Strategy](#) was published in 2021, with key working groups focused on domestic emissions, agriculture and the environment, place-making, health, and public engagement. The Scottish Government also maintains a list of [active legislation on air quality](#).

The Strategy runs until 2026, so is unlikely to see further revision until after the Scottish Parliament elections in 2026.

Once the next Scottish Government is in place, it is likely that the process for [revising the Air Quality Strategy](#) will be able to begin, at which point air quality professionals working in Scotland will be well-positioned to provide evidence and insights.

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### Wales

In 2023, the Welsh Government began the process of [reviewing its own Air Quality Strategy](#), following the [Clean Air White Paper](#) which was consulted on in 2021 and the [Welsh Government's response](#) to the consultation. Following that period of review, the Senedd passed the legislation necessary to update the Welsh approach to reaching its long-term objectives.

The [Environment \(Air Quality and Soundscapes\) \(Wales\) Act 2024](#) sets out Wales' revised approach, including:

- Processes for setting, monitoring, and reporting optional Wales-specific targets on ammonia, PM<sub>10</sub>, ground level ozone, nitrogen dioxide, carbon monoxide, and sulphur dioxide, and a mandatory Wales-specific target on the annual mean level of PM<sub>2.5</sub>;
- Measures to promote awareness of air pollution and active travel as part of a solution;
- Policies to address air quality as a local level, including [Local Air Quality Management](#), smoke control areas, and vehicle emissions regulations;
- And the requirement to produce a National Soundscapes Strategy to address noise pollution. The first iteration of the [Noise and Soundscape Plan](#) was published in December 2023 and runs until the end of 2028.

While the Welsh Government has completed the process of legislating on air quality directly, there remain several opportunities for engagement.

In early 2024, Wales has been [consulting on environmental principles and governance](#), with the objective of avoiding the potential for governance gaps created after the UK's exit from the European Union.

While the consultation is focused on broader questions of environmental governance rather than air quality specifically, the framework established by Wales will play a substantial role in determining the nation's approach to air quality going forwards, as well as ensuring that sufficient safeguards are in place to avoid any potential for environmental regression in practice.

### Northern Ireland

After two years of suspension, the Northern Ireland Assembly resumed sitting again in early 2024. Several areas of environmental policy have seen significant delays as a result, including for air quality and the overall [Environment Strategy for Northern Ireland](#), which was drafted in 2021.

Northern Ireland's most recent [annual report on air quality](#), published in late 2023, sets out the state of air quality in Northern Ireland, highlighting key challenges around ultra-fine particulate matter, ozone concentrations, and nitrogen dioxide. The report also notes the potential governance gap created by the transition from the Air Quality Strategy for England, Scotland, Wales and Northern Ireland to an England-only Clean Air Strategy, reflecting on the [Air Quality Provisional Common Framework](#) between the devolved administrations.

As the Assembly returns to its usual operations, the opportunity for increased engagement in the development of Northern Ireland's equivalent strategies and frameworks will be a crucial step in ensuring an evidence-informed approach across the UK.

Some uncertainty remains as a result of the upcoming UK general election, which could produce further delays for the Assembly and its governance processes.



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### 9. European Union and international developments

Although the UK has left the European Union, developments in air quality at the European level remain important, even for IAQM and IES members not working within the EU.

The EU's global position often sets trends for further policy developments and can send strong signals to businesses operating in both the EU and the UK, setting expectations for future policy development.

Monitoring comparative differences in policy approaches since the UK's exit from the European Union also makes clear where any environmental regression in principle could be taking place, identifying the risk of reduced air quality and the potential for cross-boundary effects.

#### Ambient Air Quality Directive

In March 2024, political agreement was reached on the [latest revisions](#) to the Ambient Air Quality Directive between the Council presidency and representatives of the European Parliament.

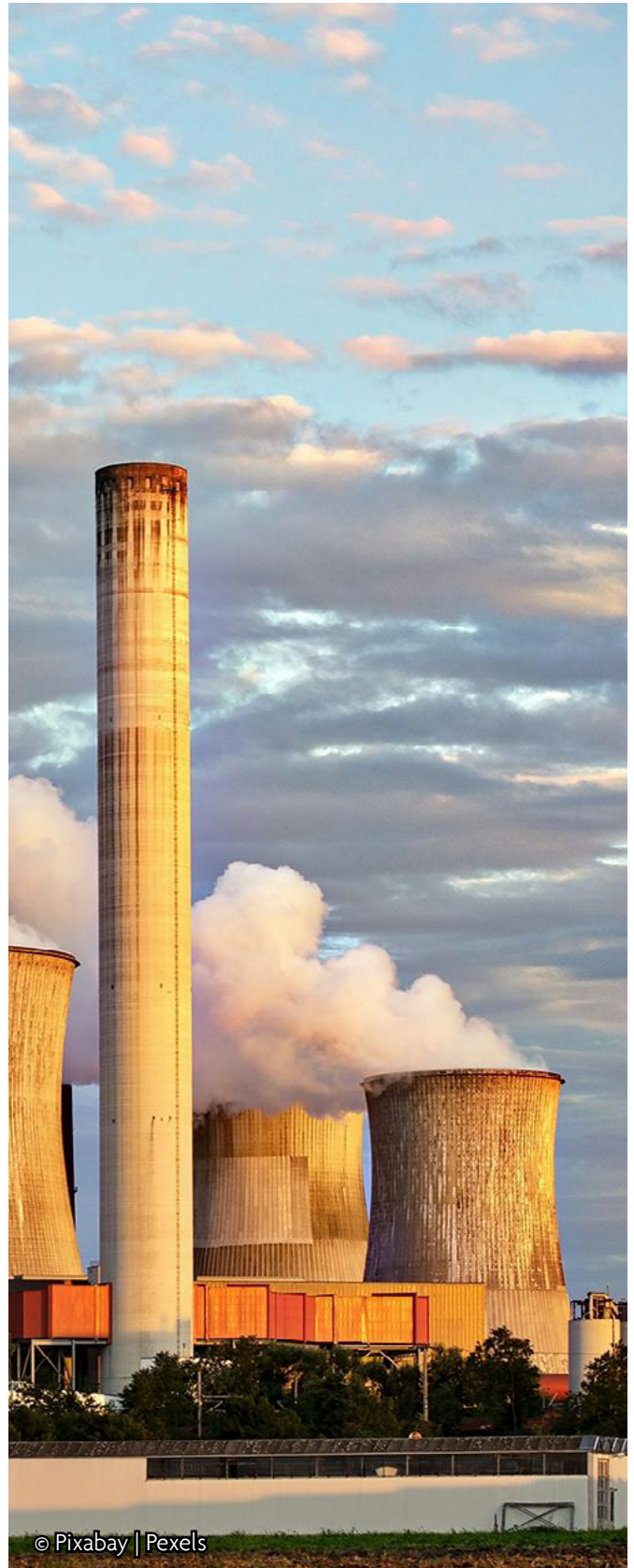
These revisions will support the EU's progress towards a 'zero pollution' standard by 2050, with new air quality standards for 2030 in line with [World Health Organisation \(WHO\) guidelines](#).

Although the agreement is currently provisional and is subject to final approval by the Council and the European Parliament, the agreement between key institutions signals that it is likely to enter into EU law, after which it will be implemented through each member state's translation of the Directive into national law.

The updated Directive sets specific standards for pollutants, including PM<sub>2.5</sub>, PM<sub>10</sub>, nitrogen dioxide, sulphur dioxide, and other key pollutants. Under the revisions, EU member states will need to attain these limit values by 2030, with the possibility of postponement only where compliance will be unachievable in that timeframe, such as for climatic reasons.

In addition to the air quality standards, the revisions set out measures to support the delivery of those standards, including:

- A requirement for air quality roadmaps for pollutants exceeding the 2030 limit or target values between 2026 and 2029;
- Air quality plans for areas exceeding limit and target values after 2030 and short-term action plans for emergency measures to reduce immediate risks to human health where thresholds are exceeded;
- Softer measures where local conditions limit the potential to reduce pollutant concentrations;



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- Provisions to promote access to justice for those seeking to challenge the implementation of the Directive, alongside entitlement to compensation for citizens whose health has been damaged by the intentional or negligent violation of the rules imposed under the Directive; and
- A clause requiring the Commission to review air quality standards in 2030 and every 5 years thereafter to support alignment with WHO guidelines and scientific evidence.

For further details on differences in environmental policy since the UK's exit from the European Union, see '[Progressing or regressing: The future of environmental science under new UK governance](#)'.

### US National Ambient Air Quality Standards

In February 2024, the USA's Environmental Protection Agency [adopted an annual mean concentration](#) for PM<sub>2.5</sub> of 9 µg/m<sup>3</sup> as a primary standard through the [National Ambient Air Quality Standards](#) (NAAQS).

Although the new standard is not yet in line with guidelines set by the World Health Organisation (WHO), it represents a more ambitious standard than the UK's current legally-binding target (see the [section on environmental targets](#) for more details).

As the USA and the EU produce more ambitious air quality targets, the overall international trend towards increased alignment with WHO guidelines could support ongoing engagement by air quality professionals in the UK, whose expertise makes them well-placed to make the case for evidence-based limits to the Government.

## 10. Retained EU Law Act

Following the UK's exit from the European Union, the Government passed a [Retained EU Law \(Revocation and Reform\) Act](#), intending to address EU laws which still had effect in the UK. EU laws were either:

- Approved and retained in law going forwards, albeit with vulnerability to further revocation until 2026;
- Added to a Schedule of laws (or other rules) which will no longer have legal force from the end of 2023; or
- Reformed and either updated or replaced with UK-created alternatives.

Several attempts were made to amend the legislation,

including by the House of Lords. The Government also changed its initial position that laws would automatically be subject to revocation unless they were explicitly retained.

Instead, laws would be revoked if they were listed in the Act's Schedule, unless a Minister subsequently removed them from the Schedule. Functionally, the consequences for those laws which the Government did not intend to retain would be the same: revocation. The Schedule contains nearly 600 laws, rules, or regulations, with consequences for an even wider body of law.

While the Government's position is that laws have been sufficiently replaced or superseded that no revocation will amount to regression on environmental commitments, questions remain about whether the same standards will apply in practice.

The result has been a significant degree of uncertainty. The final position is likely to become clear in 2024, after the final revocation of rules in the Schedule has taken place.

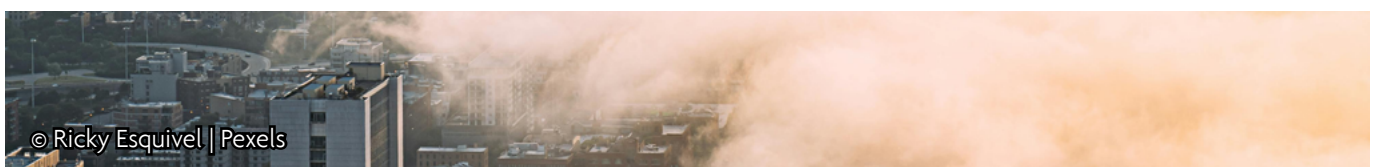
In March 2024, the Government began putting forward Statutory Instruments (SIs) to enact the revocation of European law in practice, including one [addressing 73 pieces of environmental law](#).

The SI is secondary legislation, which means that it will not follow the normal parliamentary procedure. As the Act has already been debated by Parliament, the SI will be assumed to enter into law, unless a motion is passed to reject it within 40 days. When it does, the retained EU law listed in the SI will be revoked.

The SI put forward in March does not include many of the rules initially listed in the Schedule to the Retained EU Law Act, such as laws supporting the delivery of the [National Emissions Ceilings Regulations](#) (NECR).

These laws could be subject to a further SI for revocation, or may now be retained as part of UK law going forward. The implications of the current SI for air quality are limited, as most of the laws addressing air relate to international agreements which the UK remains subject to, such as the [Basel Convention](#).

There will be a continued need for expert scrutiny by air quality professionals to determine the impacts of revoking or replacing EU laws. Consideration of how regulations work in practice will be fundamental to determining their appropriateness in the UK context, and whether ongoing reform and the further development of environmental governance is necessary.



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### 11. Environmental Improvement Plan for England

In 2023, the UK Government published its [Environmental Improvement Plan](#) for England (EIP) as the first update to its [25 Year Environment Plan](#).

While the Clean Air Strategy is the primary policy bringing together the Government's commitments on air quality in England, the EIP covers a broader set of environmental policies, including how air quality interacts with other areas of environmental law.

The Plan covers 10 high-level goals, one of which is 'Clean Air', although several of the others directly interact with air, either through adjacent natural systems or through other goals with the potential for significant co-benefits.

In January 2024, the Office for Environmental Protection (OEP) published its [annual progress report on the EIP](#), concluding that "while some progress has been made, very substantial challenges remain, and that government is largely off track to meet EIP23 ambitions, Environment Act targets and other commitments."

On clean air specifically, the OEP concluded that progress towards the goals in the OEP is mixed, with the Government only partially on track to meet its own targets. Further information is available in the IES's latest [briefing on the OEP progress report](#).

Primarily, the EIP's action on air quality is focused on targets and limit values, which are addressed in the next section on environmental targets. However the EIP also outlines several key delivery mechanisms in support of reaching the selected targets. These include:

- Measures to address (but not ban) domestic burning and promote a shift from more-polluting appliances, in conjunction with reductions in the maximum emissions for domestic burning in [Smoke Control Areas](#);
- Reviewing the communication of air quality information and running targeted campaigns to promote best practice for stoves, fireplaces, and domestic burning (see the [section on public engagement](#) for more information);
- Assessing the efforts of Local Authorities to improve air quality, re-aligning air quality zones with local government boundaries, and providing supporting guidance and funding;
- Committing to Local Transport Plan guidance to provide Local Authorities with more support in making decisions;
- A commitment to consult on improvements to the mechanisms for developing industrial process standards

so that they better reflect environmental goals, particularly for smaller industry (where petrol stations, metals processing, and quarrying are specifically mentioned) based on the [Best Available Techniques](#) (BAT) approach;

- Measures to address nutrient use in agriculture, including through the [Sustainable Farming Incentive](#), a commitment to consult on extending environmental permitting to dairy and intensive beef farms, and new funding for infrastructure and technology – with a view to addressing ammonia emissions, inorganic fertilisers, and emissions from increased anaerobic digestion;
- Increasing the rollout of [Clean Air Zones](#) (see the [section on local government and planning](#) for more information)
- Supporting the transition to 'zero emission vehicles' and ambition of the [Transport Decarbonisation Plan](#) through a range of measures such as investing in routes for active travel and the development of [Active Travel England](#), research into mitigation options for brake and tyre wear, and the early exploration of a single regulatory framework for all road vehicles;
- Commissioning a review of regulations governing air quality on the rail network, in conjunction with a [Stations Air Quality Monitoring Network](#) supported by £4.5million of funding;
- Seeking co-benefits for air from the refreshed [Clean Maritime Plan](#) and other measures to address the environmental impact of the domestic maritime sector.

Naturally, there are also many other areas of the EIP which may directly or indirectly influence air, with the potential for both risks as well as significant co-benefits in the delivery of the Plan. For more information, see the full [Environmental Improvement Plan](#).

Since November 2023, all Government departments are also subject to the [Environmental Principles Policy Statement](#) (EPPS), which requires Ministers to have regard to five core environmental principles when making decisions.

While this includes the effects of those decisions on air pollution, it does not encompass all decisions and may still lead to unintended consequences and environmental harm.

Although the Plan itself is now in place, it is clear that there will be several key opportunities for engagement by air quality management experts over the coming years.

For the ambition of the EIP to be fully realised, it must be implemented and delivered. Engagement from air quality professionals can support that process of implementation by providing insights on the success of delivery measures.

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## 12. Environmental targets

Along with the Environmental Improvement Plan (EIP) for England, the Government has published a framework of long-term [legally-binding environmental targets](#), including those which apply to air quality, as required under the [Environment Act](#).

### Legally-binding targets

Several of the targets will have implications for air pollution, including two which directly address  $PM_{2.5}$ . The EIP also sets out interim targets to support progress towards the long-term targets, and to support the wider goal of clean air.

The [long-term targets for air quality](#) are:

- An annual mean concentration target that “by the end of 31st December 2040 the annual mean level of  $PM_{2.5}$  in ambient air must be equal to or less than  $10 \mu\text{g}/\text{m}^3$ ”;
- A population exposure reduction target that “there is at least a 35% reduction in population exposure [to  $PM_{2.5}$ ] by the end of 31st December 2040 ... as compared with the average population exposure in the three-year period from 1st January 2016 to 31st December 2018”;

The [interim targets for clean air](#) set out in the EIP are:

- An interim mean concentration target that “by the end of January 2028, the highest annual mean concentration in the most recent full calendar year must not exceed  $12 \mu\text{g}/\text{m}^3$  of  $PM_{2.5}$ ”;
- An interim population exposure target that “by the end of January 2028, compared to 2018, the reduction in population exposure to  $PM_{2.5}$  in the most recent full calendar year must be 22% or greater”;

Outside of the specified air quality targets, a number of the other targets may present the possibility of risks or co-benefits for air. These include:

- A target to address nutrient pollution to watercourses from agriculture (specifically from nitrogen, phosphorus, and sediments), which may influence agricultural practices which also affect air quality;
- A target to address nutrient pollution to watercourses from treated wastewater (specifically phosphorus), which may influence waste and its impact on air quality;
- A target to increase tree canopy and woodland cover, which may lead to co-benefits for air quality, but which could also create competing incentives for land use, raising potential challenges and opportunities for air quality.

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## Policy developments and opportunities to engage

### Relationship with other targets

Importantly, the air quality targets act in conjunction with the [existing targets and limit levels](#) which are already enshrined in UK legislation.

Many of these existing air quality objectives are explicitly listed in the EIP, such as compliance with a 40µg/m<sup>3</sup> limit for nitrogen dioxide concentration and emission reduction targets for nitrogen oxides, sulphur dioxide, PM<sub>2.5</sub>, ammonia, and [non-methane volatile organic compounds](#) (NMVOCs).

In 2023, the Environment Agency consulted on Environmental Assessment Levels (EALs) for air quality, following a [prior period of consultation](#) during 2021 and ahead of a forthcoming third phase of consultation.

The Government has now [published its response](#) to the second phase of the consultation, resulting in a series of additional clarifications on existing guidance, the evidence base for assessment levels, and how the new EALs will be implemented.

Although there are other policy targets and limit levels addressing air, the targets listed in the EIP are likely to be the primary focus of UK Government policy on air quality, given their legally-binding and high profile nature.

Engagement from air quality management practitioners remains critical. Going forward, it will be important to ensure that efforts to implement and meet the targets accurately reflect the insights and expertise that the environmental sciences have to offer.

For further commentary on the selected targets and how they might affect policy and regulation for air quality, see the consultation responses to the environmental targets consultation from [the IAQM](#), its sister organisation, [the IES](#), and the [Society for the Environment](#).

## 13. Local government and planning

The local scale continues to be a crucial avenue for the delivery of air quality outcomes. Another round of [Air Quality Grants to local authorities](#) was released in August 2023, providing an additional £6million to support measures and reduce the impact of air pollution on local health outcomes.

### Clean Air Zones

The ongoing implementation of [Clean Air Zones](#) during the coming months will provide further mechanisms to address ambient air quality, particularly in cities. The introduction of zones across England in recent years continues to provide opportunities to improve implementation and governance of

clean air in urban contexts, though Clean Air Zones have been subject to a degree of public scrutiny (see the [section on public engagement](#) for more information).

Following the review of plans for a [Clean Air Zone for Greater Manchester](#), the authority is no longer proposing a Clean Air Zone and has proposed an “[investment-led Clean Air Plan](#)” with the goal of a more cost effective approach. The proposals have been submitted to the Government, which will make the ultimate decision on what is included in the final Clean Air Plan.

### Local authority finances

Local authorities continue to face highly limited resources, with financial uncertainty increasing for many since mid-2023. The [BBC's Shared Data Unit](#) has reported that UK Councils owed nearly £100billion of debt at the start of 2024.

Since 2022, five councils have [effectively declared bankruptcy](#) by issuing section 114 notices which limit spending commitments and require new budgets in response to financial decline.

While local authorities have already adapted to limited finances over recent years, the continued decline in resources presents challenges for air quality management, where several key policy approaches rely on local delivery, such as through Local Air Quality Management and Clean Air Zones.

The increased uncertainty around local authority finances raises questions about the capacity of authorities to deliver on air quality objectives, and whether local finances are being sufficiently managed to provide long-term approaches to air pollution and other environmental challenges.

### Guidance for local authorities

Despite the ongoing importance of local delivery, gaps remain on guidance for local authorities in delivering clean air in practice, such as on the contribution of local authorities to achieving PM<sub>2.5</sub> targets following the [Air Quality Strategy's framework for local authority delivery](#).

Monitoring will be especially important to ensure the implementation of the Government's targets for PM<sub>2.5</sub> in practice. As the Government expands its monitoring network, particularly automatic monitoring through the [Automatic Urban and Rural Network](#), expertise from air quality science will be needed to validate data and apply its implications through the evaluation of specific policy instruments.

### Planning and consenting processes

The local scale also has significant consequences for air quality through the planning system. Consenting processes directly engage with several of the sources of air pollution, with the

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potential to create infrastructure which contributes to positive outcomes for air.

As part of the transition following the UK's exit from the European Union, the [Levelling-Up & Regeneration Act](#) will make significant changes to some of those processes, particularly for the planning system, where [Environmental Impact Assessments](#) and [Strategic Environmental Assessments](#) are expected to be replaced with [Environmental Outcomes Reports](#) (EORs).

Those changes, as well as changes to the [National Planning Policy Framework](#) (NPPF), were subject to consultation in 2022 and 2023, providing some expectations about how those processes will interact with air quality in the future. While the NPPF was updated in December 2023 following the consultation, its implications for air quality are largely unchanged and primarily limited to updated paragraph numbers due to other changes across the framework.

Similarly, the [consultation on EORs](#) explicitly highlighted air quality as an objective of the new regime, suggesting a limited degree of change in England.

Further indications of the Government's approach to the interaction between planning and air quality is available in the [Environmental Improvement Plan](#). That approach is primarily based on using the NPPF and [Building Regulations](#) to contribute towards meeting limit values for ambient air and to set ventilation requirements to address indoor air.

While it was expected that the forthcoming [Land Use Framework](#), originally due to be published by the end of 2023, would have an effect on these processes and their interaction with air quality, the latest expectation is that the Framework will effectively play a guidance role, rather than taking a geospatial or strategic approach, so its effects on air quality may be limited.

In London, the London Planning Guidance for [Air Quality Neutral](#) (AQN) and [Air Quality Positive](#) (AQP) have now been

formally adopted by the Greater London Authority, following the [summary report](#) on the related consultation which was held during 2022.

Now that the Guidance is in place, the benchmarks it sets out will influence developments with a view to reducing transport and building emissions.

The primary engagement with the Guidance by air quality practitioners will be through its implementation on individual developments. For AQN and AQP Statements to be more than a 'box ticking exercise', they will require robust evidence, so professional expertise remains important.

There are also likely to be opportunities to continue to engage on the effectiveness of the implementation of the Guidance, particularly ahead of the next [Annual Monitoring Report for the London Plan](#).

In Scotland, the [Fourth National Planning Framework](#) (NPF4) has been published. Similarly to the proposals for the NPPF, NPF4 recognises the importance of air quality in planning decisions, outlining that developments which pose "*significant adverse effects*" for air quality will not be permitted, as well as promoting the need to identify opportunities through developments to improve air quality and reduce exposure to pollution. Substantively, this is likely to lead to air quality remaining one of many considerations in Scottish planning decisions.

Soon, processes will be in place across the devolved administrations for planning decisions and local government to support the increased inclusion of improved air quality in decision making.

For those tools to be effective, engagement by air quality professionals will be necessary to maximise air quality as a consideration in local developments and to promote an approach which secures multiple benefits.



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## Box 1. What is EPIC and how is it linked to the IAQM?

[The Environmental Policy Implementation Community \(EPIC\)](#) is a new community of environmental experts within the Institution of Environmental Sciences (IES), supporting the urgent implementation of ambitious environmental policies. EPIC is the result of a merger between the IES and Environmental Protection UK (EPUK), which was the UK's oldest environmental charity.

EPIC produces guidance, runs workshops and engages in thought-leadership on key environmental delivery challenges for their members: local authority officers and other environmental professionals delivering on the ground. EPIC works with other communities within the IES family, including the IAQM, to link scientific expertise with insights on policy implementation, particularly through local authorities.

In 2024, EPIC is focusing on several priority areas for environmental implementation:

- Guidance on integrated local action on air quality and climate change
- Delivering nature recovery through Local Nature Recovery Strategies and Biodiversity Net Gain
- Implementation science and its implications for environmental policy
- Noise as an underrepresented environmental challenge
- Other key issues for delivering environmental policy at a local level

Sign up to the [EPIC mailing list](#) for more information and updates.

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### 14. Agriculture

Agricultural payments are now subject to reform in each of the devolved nations of the UK as the country moves away from the EU's [Common Agricultural Policy](#).

In England, there has been a degree of doubt about the opportunity presented by [Environmental Land Management Schemes](#) (ELMS) due to limited uptake and uncertainty about the level of commitment from the Government.

The Environmental Improvement Plan (EIP) committed to direct support for agroforestry through:

- The rollout of the agroforestry standard for the [Sustainable Farming Incentive](#) by 2024;
- Further development of [Countryside Stewardship](#);
- Grants for forestry equipment through the [Farming Equipment and Technology Fund](#); and
- Further pilot schemes to support agroforestry.

The latest guidance and funding commitments have been a positive sign for the possibility of an increased move towards regenerative agriculture, though there are still some uncertainties about the [potential to deliver sustainable farming](#) at the scale needed to meet England's environmental commitments.

For air quality associated with emissions from rural sources, the challenges arising from the guidance gap are particularly pronounced. Unlike in the planning sector, where air quality assessments have been routine for a long time, not all agricultural land managers have access to the same networks of expertise.

As the [Sustainable Farming Incentive](#) is implemented in practice, this may require new approaches and collaborations.

This will be particularly important as ammonia and PM<sub>2.5</sub> emissions from agriculture remain elevated, so links between air quality professionals and land managers may become increasingly relevant throughout the early years of ELMS and its equivalents in the devolved administrations.

### *Further information*

### 15. Influencing Government decisions

An IES member briefing note: '[Influencing the UK Parliament](#)', first published in 2011 and most recently re-issued in 2022, provides an overview of some of the ways that environmental professionals can influence Parliament and legislation.

The IES also runs training to help environmental professionals learn more about policy, how it affects them, and how they

can influence policy decisions. Regular training sessions are available for sign-ups [on the IES website](#).

In the UK, many issues of environmental policy are devolved to national administrations. If you live in Scotland, you can contact your [Member of Scottish Parliament](#) or [learn more](#) about influencing Scottish legislation.

If you live in Wales, you can [contact your Member of Senedd Cymru](#) or learn more about the [business of the Senedd](#).

If you live in Northern Ireland, you can [contact your local Member of the Legislative Assembly](#) or learn more about the [Assembly's work](#).

### 16. Other relevant laws & regulation

Find out more about existing legislation on this topic:

- [Environment Act 2021](#)
- [Environmental Improvement Plan for England](#)
- [Clean Air Strategy 2019](#)
- [Air Quality Strategy for England \(2023 revisions\)](#)
- [UK Net Zero Strategy](#)
- [Scotland's second Air Quality Strategy](#)
- [Environment \(Air Quality and Soundscapes\) \(Wales\) Act 2024](#)
- [Environment Strategy for Northern Ireland](#)
- [EU Ambient Air Quality Directive \(2024 revisions\)](#)
- [Retained EU Law \(Revocation and Reform\) Act](#)
- [Retained EU Law: Statutory Instrument to revoke regulations on Environment, Food and Rural Affairs \(2024\)](#)
- [OEP Annual progress report on the EIP](#)

Read other relevant briefings from the IAQM and the IES:

- [Horizon scanning: Air quality policy \(2023 version\)](#)
- [Draft guidance: Integrated Action on Air Quality and Climate Change \(EPIC\)](#)
- [Progressing or regressing: The future of environmental science under new UK governance'](#)
- [IES Briefing: the OEP progress report on the EIP](#)
- [IAQM response to environmental targets consultation](#)
- [Transforming the planet: Our vision for the future of environmental science](#)

Is there a policy-related topic which you would like to see covered by the IAQM? Get in touch at [info@iaqm.co.uk](mailto:info@iaqm.co.uk) to let us know your thoughts on potential topics for future briefings, or with your suggestions for other content.



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