



# The Association of Directors of Public Health Consultation Response

## Air pollution in England

### Objectives and Scope

The Environmental Audit Committee has released a new [inquiry](#) on air pollution. MPs will explore the impacts air pollution has on health across different communities in England, and on the environment, such as through reduced crops, acid rain or biodiversity loss. They will explore whether the Government's current air quality targets are adequate to protect health and the environment, and how these compare with standards by other bodies, such as the World Health Organisation.

### About ADPH

ADPH is the representative body for Directors of Public Health (DsPH), and is a collaborative organisation, working in partnership with others to strengthen the voice for public health, with a heritage which dates back over 160 years. We also work closely with a range of Government departments, including [DHSC](#) and [UKHSA](#), as well as the four CMOs, NHS, devolved administrations, local authorities and national [organisations](#) across all sectors to minimise the use of resources as well as maximise our voice.

ADPH aims to improve and protect the health of the population by:

- Representing the views of DsPH on public health policy.
- Advising on public health policy and legislation at a local, regional, national and international level.
- Providing a support network for DsPH to share ideas and good practice.
- Identifying and providing professional development opportunities for DsPH.

### ADPH response

#### Sources and causes of air pollution

- Air pollution is a 'substance or complex mixture of particles and gases in the air that cause harm to people's health'. It can originate from natural and human sources and is an issue both outdoors and indoors.<sup>1</sup>

#### Outdoor air pollution

- Common outdoor air pollutants include fine particulate matter (PM<sub>2.5</sub>), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), and sulphur dioxide (SO<sub>2</sub>). They can be generated from transport, industrial processes, farming, energy generation and domestic heating.

## Indoor air pollution

- Domestic appliances containing carbon-containing fuels (eg heaters and ovens), environmental tobacco smoke (ETS), second-hand smoke (SHS), cleaning and personal care products, building materials and household consumer products are major sources of indoor air pollution.

## Impacts of air pollution

### Health impacts

- The World Health Organisation (WHO) has called air pollution (both indoor and outdoor): ‘the biggest environmental risk to health, carrying responsibility for about one in every nine deaths annually.’<sup>ii</sup>
- In the UK, the equivalent of around 30,000 deaths is estimated to be attributed to air pollution, through increased risk of diseases such as heart disease, stroke, respiratory diseases, and cancer.<sup>iii</sup>
- Air pollution contributes to over 20,000 respiratory and cardiovascular hospital admissions per year<sup>iv</sup> and could have long-term impacts on health.
- There are striking health inequalities associated with air pollution. When combined with other social determinants, it creates a disproportionate disease burden in the most deprived areas.<sup>v</sup>
  - For example, low-income individuals are more likely to have existing medical conditions, live in areas with poorer outdoor and indoor environments, such as near busy roads, and have worse access to decent housing and green spaces.<sup>vi</sup>
- Given the disproportional impact of air pollution on vulnerable individuals, more work is required to engage populations most susceptible to poor air quality and ensure that they know where to obtain information on local air quality. To achieve this, DsPH and their teams can work with local partners such as schools and health professionals to deliver information to these groups.

### Economic impacts

- Air pollution has a significant impact on the economy, with an estimated cost of £27 billion in 2019 in the UK through healthcare costs, productivity losses and lost utility.<sup>vii</sup>
- To mitigate any inequalities in air pollution policies, public support needs to be gained, and possible unintended consequences mitigated.
  - For example, Clean Air Zones (CAZs) (including Ultra Low Emission Zones in London) are associated with a reduction in PM<sub>2.5</sub>, NO<sub>2</sub> and PM<sub>10</sub>, and there has not yet been evidence that they displace emissions to neighbouring areas.
  - While implementing CAZs, it is also essential that communities have access to services such as viable public transport, or that support is provided to those in CAZs to switch to a vehicle with lower emissions, helping all people to change to less polluting modes of transport, regardless of their income level.

## Adequacy of current national targets

- Whilst we support clear, funded plans for the improvement of air quality, the Government should be more ambitious in its attempt to reduce the impacts of air pollution.
  - For example, the [Air Quality Environment Act target delivery plan](#) outlines an annual Mean Concentration Target for PM<sub>2.5</sub> to reach a maximum of 10 µg/m<sup>3</sup> by 31<sup>st</sup> December 2040.
  - This target, however, should instead reflect WHO’s recommendation<sup>viii</sup> that the annual average concentration of PM<sub>2.5</sub> should not exceed 5 µg/m<sup>3</sup>.

- Whilst setting more ambitious and impactful targets, the Government should also outline the role of local authorities (LAs) in air pollution, and the relevant support available to them.

## Enforcing air quality regulations in England

### Role of public health

- Public health should be placed at the centre of air quality control and future national planning policy to improve population health and wellbeing, and reduce the social cost of poor health.
- LAs should be supported in taking a whole systems approach to air quality through their decisions on local land use planning, environmental health, Smoke Control Areas, roads, highways, environmental permitting and local air quality management.
- They should be supported with resources, adequate staffing, and additional inspection capacity to enforce restrictions and reduce pollution. Enforceable restrictions should also be imposed within the existing regulatory framework.
- Examples of good local practice include:
  - Leeds City Council, who are using planning to encourage sustainable developments, focusing on urban areas and brownfield sites close to existing infrastructure, reducing the need for cars.<sup>ix</sup>
  - Knowsley Council, who have begun the delivery of their Air Quality Strategy, with key actions such as providing residents with advice on damp, mould, smoking cessation, and ventilation.<sup>x</sup>

### Data, evidence and monitoring

- More evidence is needed to identify high-impact interventions which are likely to have the greatest co-benefits for both air quality and health.
- Local air quality monitoring is crucial as comprehensive, accessible air quality data within LA boundaries is important to facilitate an evidence-based approach to reducing air pollution.
- LAs should therefore be supported to include data on air quality in Joint Strategic Needs Assessments so that Health and Wellbeing Boards, and other local partners, are equipped with the information needed to act. Examples of this in practice include:
  - East Sussex's JSNA on air quality in 2024.
  - Surrey's JSNA on air quality in 2025.<sup>xi xii</sup>

### Partnerships

- It is vital to develop partnerships across national, regional, and local boundaries to implement effective, sustainable strategies to bring down mortality associated with air pollution, as air pollution does not adhere to boundaries.
- To support national and local alignment, the Government must play a key role in joining up the work of different departments at local, regional, and national levels to enable a more robust regulation framework. It should provide a country-wide perspective to support and inform advice, guidance, and regulations' enforcement at the local level.
- In 2017, the Department for Environment, Food, and Rural Affairs (DEFRA), the Local Government Association (LGA) and ADPH published Air Quality: A Briefing for DsPH, which provides guidance to Directors of Public Health (DsPH) about how they can work collaboratively with local partners to improve air quality.<sup>xiii</sup>

- This includes working with Environmental Health teams who are familiar with local data on air quality to identify new ways of tackling air pollution and reducing exposure to emissions.
- System partners should continue to collaborate to produce key information that guides system leaders in air quality improvement across sectors.

## Awareness on air quality

- The Government should take action to increase awareness of the impacts of poor air quality.
  - For example, Governments across the four nations should raise awareness of the impact of agriculture on air quality and provide strong national messaging, with agriculture contributing to the emission of air pollutants such as Ammonia and Nitrous Dioxide.
- National messaging should also be provided to reduce solid burning in domestic combustion, with restrictions imposed on the installation of solid fuel and polluting wood burners in urban areas.
- Governments across the four nations should also prioritise and continue to invest in infrastructure for active travel to empower local populations to take action to reduce the impact of air pollution, such as using accessible public transport.

## LA funding and resources

- Decreases in LA public health funding have seen continuous cuts, and a significant increase in public health funding is needed to support LAs to bring about long-term improvement through increased capacity to monitor and enforcement. Funding is also crucial to support awareness raising.
- In England, LAs' public health funding has been cut by around a quarter (in real terms on a per person basis) over the last decade. Despite a welcome increase in the last two years, the grant is still not comparable to 2015/16 levels. A significant increase in public health funding is therefore needed to bring about long-lasting improvement to the nation's health and make the Government's ambition to shift from treatment to prevention (as outlined in the 10-Year Health Plan) a reality.
- We do, however, recognise that there is only a limited amount of money. DsPH will continue to work closely with colleagues and partners across a wide range of sectors to support effective, evidence-based, initiatives that help prevent ill-health, promote and protect health and wellbeing, and support people to live healthier lives for longer.

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<sup>i</sup> Office of Health Improvement & Disparities, Air pollution: applying All Our Health. 2022.

<https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health> [Accessed February 2026]

<sup>ii</sup> World Health Organisation, Ambient air pollution: a global assessment of exposure and burden of disease. 2016. <https://apps.who.int/iris/bitstream/handle/10665/250141/9789241511353-eng.pdf?sequence=1> [Accessed February 2026]

<sup>iii</sup> Royal College of Physicians. *A breath of Fresh Air*. 2025. [140725-update-rcp-summary-for-policymakers-a-breath-of-fresh-air-responding-to-the-health-challenges-of-modern-air-pollution.pdf](https://www.rcp.ac.uk/140725-update-rcp-summary-for-policymakers-a-breath-of-fresh-air-responding-to-the-health-challenges-of-modern-air-pollution.pdf) [Accessed February 2026]

<sup>iv</sup> Asthma and Lung UK. *The invisible threat*. [https://www.asthmaandlung.org.uk/sites/default/files/2023-03/Invisible\\_Threat\\_FINAL\\_compressed.pdf](https://www.asthmaandlung.org.uk/sites/default/files/2023-03/Invisible_Threat_FINAL_compressed.pdf) [Accessed February 2026]

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- <sup>v</sup> Department for Environmental Food & Rural Affairs & Department for Transport, Improving air quality in the UK: tackling nitrogen dioxide in our towns and cities. 2017. [https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/supporting\\_documents/Draft%20Revised%20AQ%20Plan.pdf](https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/supporting_documents/Draft%20Revised%20AQ%20Plan.pdf) [Accessed February 2026]
- <sup>vi</sup> University College London, Systemic inequalities driving exposure to high indoor air pollution in London. 2021. <https://www.ucl.ac.uk/news/2021/may/systemic-inequalities-driving-exposure-high-indoor-air-pollution-london> [Accessed February 2026]
- <sup>vii</sup> Royal College of Physicians. *A breath of Fresh Air*. 2025. [140725-update-rcp-summary-for-policymakers-a-breath-of-fresh-air-responding-to-the-health-challenges-of-modern-air-pollution.pdf](https://www.rcp.ac.uk/140725-update-rcp-summary-for-policymakers-a-breath-of-fresh-air-responding-to-the-health-challenges-of-modern-air-pollution.pdf) [Accessed February 2026]
- <sup>viii</sup> World Health Organisation. *What are the WHO air quality guidelines?* <https://www.who.int/news-room/feature-stories/detail/what-are-the-who-air-quality-guidelines> [Accessed February 2026]
- <sup>ix</sup> Leeds City Council. *Heat in the City: Our Health in a Warming Leeds*. <https://www.leeds.gov.uk/public-health/director-of-public-health-annual-report-2025> [Accessed February 2026]
- <sup>x</sup> Knowsley Council. *Knowsley Public Health Annual Report 2024.25*. 2025. [Update on recommendations from 2023-24 - Improving lung health.pdf](https://www.knowsley.gov.uk/media/140725-update-rcp-summary-for-policymakers-a-breath-of-fresh-air-responding-to-the-health-challenges-of-modern-air-pollution.pdf) [Accessed February 2026]
- <sup>xi</sup> East Sussex City Council. Air Quality in East Sussex.2024. <https://www.eastsussexjsna.org.uk/resources/air-quality-in-east-sussex/> [Accessed February 2026]
- <sup>xii</sup> Surrey County Council. Air Quality.2025. <https://www.surreyi.gov.uk/jsna/air-quality/> [Accessed February 2026]
- <sup>xiii</sup> Department for Environment, Food and Rural Affairs, Local Government Association and The Association of Directors of Public Health, Air Quality A Briefing for Directors of Public Health. 2017. [https://www.local.gov.uk/sites/default/files/documents/6.3091\\_DEFRA\\_AirQualityGuide\\_9web\\_0.pdf](https://www.local.gov.uk/sites/default/files/documents/6.3091_DEFRA_AirQualityGuide_9web_0.pdf) [Accessed February 2026]