Questionnaire Survey of UK Local Authorities on the Local Air Quality Management Process

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Executive Summary

Air Quality Consultants Ltd (AQC) and the Air Quality Management Resource Centre at the University of the West of England, Bristol (UWE) were commissioned by Defra and the Devolved Administrations to undertake a questionnaire survey of UK local authority air quality practitioners on the Local Air Quality Management (LAQM) process. This survey forms part of a review of the LAQM process commissioned by Defra and being undertaken by In House Policy Consultants (IHPC). The purpose of this questionnaire survey is to collate information from local authority officers (with a remit for air quality management) on the strengths/weaknesses of the LAQM process and identify opportunities for improvements to the current process to advance the achievement of National Air Quality Objectives and also assist National Government in achieving the European Union Limit Values.

A questionnaire was created by the Project Team following consultation with a wider stakeholder group (consisting of representatives from Defra, the Scottish Government, the Welsh Assembly Government, the Greater London Authority and the Department of Environment, Northern Ireland) and was further refined following a pilot study with eight local authorities from around the UK. The majority of the questions in the questionnaire were qualitative (open questions) rather than quantitative (closed questions) in nature. This ensured that the data generated has been used as evidence for theory construction rather than evidence of a pre-existing theoretical position that the reviewer or anyone else may have had. The questionnaire responses were analysed using Grounded Theory Methodology, meaning that the responses were coded according to topics resulting in the emergence of themes and semi-quantitative data[1]. Themes and sub-themes were generated by reviewer's professional experience about those issues that are important in relation to the LAQM process.

Section A: Introductory Information

The overall response rate for the survey was 55% (239 out of 433 authorities). Of the 239 questionnaires received, the majority (74%) were from English respondents, however, when the response rate is illustrated as a percentage of respondents by region it indicates a consistently high response rate across all regions (England 55%, London 52%, Northern Ireland 42%, Scotland 69% and Wales 59%).

The majority of respondents (54.8%) described their Council area as predominantly rural in nature. All of the respondents had an environment related title ranging from Technical Officers to Air Quality Specialists to Principal Environmental Health Officers to Directors of Environmental Health.

Section B: Overview of Local Air Quality Management

Section B of the questionnaire provided an opportunity for the respondents to comment on the main points of LAQM process as a whole rather than on specific elements. This section of the questionnaire included five distinct questions.

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[1] Please note, unless stated otherwise, the percentages quoted in this report refer to percentage of coded references relating to a theme not the percentage of respondents. For further clarification on the distinction between references and respondents please see Section 2, paragraph 2.3.

Question B1: What do you identify as the main strengths of the LAQM process as a whole? Of the 239 questionnaires received, 194 respondents (81.2%) provided one or more answers to this question. The initial parent-theme screening of Question B1 identified five main 'LAQM Strength' topics and numerous sub-themes.

- The LAQM framework and reporting structure (31%): Many respondents stated that the LAQM process has a logical and structured framework, which provides the opportunity for regular reviewing of air quality data. Additionally, the uniformity and consistency of the process, the statutory basis of the process and the requirement to take action should an exceedance be identified were all considered positives.

- The guidance and support mechanisms (23%): Respondents identified the guidance and support mechanisms provided by central government, such as the Technical and Policy Guidance, helpdesk, websites, funding schemes, support tools and training opportunities, as a positive of the process.

- Opportunities for profile raising and engagement with other agendas (21%): Respondents stated that undertaking LAQM provided opportunities for profile raising with various parties including land-use planning colleagues, the public, elected members and transport colleagues. Undertaking LAQM also facilitates partnership working both internally (between departments) and externally (with the public and local business/industry).

- Providing information on local air quality (18%): Respondents reported that undertaking LAQM allowed air quality 'hot-spots' to be identified while maintaining and utilising local knowledge. The air quality data collated by the process provides evidence to inform local decision making, including trends in local air quality and allows sources of pollution to be identified.

- Miscellaneous (7%): Some miscellaneous 'strengths' identified by respondents include clear Air Quality Objectives, opportunities of in-house capacity development and recognition that the LAQM process can provide a national overview of air quality.

Question B2: What do you identify as the main weaknesses of the LAQM process as a whole? Of the 239 questionnaires received, 189 respondents (79.1%) provided one or more answers to this question. The initial parent-theme screening of Question B2 identified four main 'LAQM Weakness' topics.

- Limited powers and lack of engagement by other agendas (43%): There was a common awareness among respondents that local authorities have no powers to enforce action to remediate local air quality. Difficulties were reported in engaging various agendas such as transport, land-use planning, health and climate change. Respondents reported potential conflicts between national/regional/local policies and a difficulty in influencing regional air quality issues. Additionally, the limited profile of air quality among the public and elected members was raised as a weakness of the process.

- Cost and resource limitations (26%): A lack of general resources to undertake LAQM duties was highlighted by respondents, including a lack of funding and central government support, limitations in local authority staff capability/capacity and the cost of monitoring equipment.

- **LAQM framework and reporting issues (25%)**: Many respondents stated that the LAQM process could be onerous, bureaucratic and inflexible. Some respondents voiced concerns with specific Air Quality Objectives (e.g. PM_{10} in Scotland) and some suggested that there should be less emphasis on diagnosis and more emphasis on action. Additionally, a few respondents reported problems with the appraisal process and highlighted limitations of current air quality legislation.

- **Miscellaneous (6%)**: Some miscellaneous 'weaknesses' identified by respondents include limitations of the action planning process, mismatch between submissions to the European Union and the findings of LAQM, the unsuitability of the process to scenarios in London and a lack of statutory duty for local authorities to achieve the Air Quality Objectives.

Question B3: Could any further actions and support be usefully provided by central government to facilitate local authorities in undertaking their LAQM duties? Of the 239 questionnaires received, 166 respondents (69.5%) provided one or more answers to this question. The initial parent-theme screening of Question B3 identified six main 'LAQM Actions and Support' topics.

- **Better resources and funding opportunities (29%)**: The majority of respondents called for the provision of ring-fenced funding to support monitoring, dispersion modelling, AQAP development and implementation, local authority staff and training opportunities.

- **Improvements to guidance, training and support mechanisms (26%)**: Respondents recognised the need for more training opportunities, additional support tools (e.g. tools for quantifying emission reductions), improvements to guidance (e.g. guidance on development control, low emission strategies, formulation of transport plans etc), a support mechanism for air quality and land-use planning (e.g. dealing with planning applications and assessing significance) and support mechanisms for AQAP development and implementation.

- **Facilitating engagement with other agendas (20%)**: Respondents recognised the need for support in engaging with various agendas including transport, land-use planning, climate change and health and in doing so raising the profile of air quality.

- **Changes to the LAQM framework (9%)**: Some respondents called for a reduction in the reporting burden on local authorities and suggested there should be more flexibility in reporting timescales and more autonomy for authorities. Additionally, respondents recognised the need for improvements in the delivery of guidance and the report appraisal responses and the simplification of the AQMA declaration process.

- **Improvement to powers or legislation to support local authority action (8%)**: Respondents called for more powers to enforce action, better direction at a national level, updated legislation to reflect the current understanding of LAQM and more powers to influence land-use planning.

- **Miscellaneous (8%)**: Some miscellaneous responses include naming and shaming poorly performing authorities, retaining the Air Quality Grant scheme and maintaining the current levels of support.

Question B4: What do you identify as the main changes (including legislative changes) you would like to see implemented to improve the LAQM process as a whole? Of the 239 questionnaires received, 135 respondents (56.5%) provided one or more answers to this question. The initial parent-theme screening of Question B4 identified six main 'LAQM Main Changes' topics.

- Increased responsibilities for other agendas (41%): Respondents called for improvements in relationships with other agendas and increased responsibilities for transport and land-use planning agendas. Respondents also recognised the need for better integration with the climate change agenda and better links with industry.

- Changes to the LAQM framework (27%): Respondents again suggested a reduction and/or more flexibility in reporting, changes to Air Quality Objectives (e.g. PM_{10} in Scotland) and improvements to the appraisal process.

- New powers and/or legislation to support local authority action (15%): Some respondents suggested changes to legislation (including updating the Clean Air Act), more local powers to enforce action and better direction from central government.

- Better resources and funding opportunities (7%): Respondents suggested improvements to ring-fencing of funding mechanisms for the development and implementation of AQAPs and undertaking monitoring and dispersion modelling studies.

- Improvements to guidance, training and support mechanisms (5%): Respondents requested more guidance on specific subjects such as land-use planning and transport while improving existing support in areas such as the provision of training opportunities and action planning.

- Miscellaneous (5%): Some miscellaneous responses include stronger action on a national scale to control emissions from transport and increasing/improving the use of public transport.

Question B5: Any other comments? Of the 239 questionnaires received, 69 respondents (28.9%) provided additional comments. The coded responses have resulted in the emergence of four main themes which echo statements that had been previously made in response to Questions B1-B4. These include improving engagement with other agendas (49%), changes to the LAQM framework (19%), miscellaneous positive comments about the process as a whole (19%) and calls for better resources and funding (13%).

Section C – Review and Assessment

Section C of the questionnaire provided an opportunity for the respondents to comment on the Review and Assessment elements of the LAQM process. It covers all aspects of the Review and Assessment process leading up to the point of identifying the need for an Air Quality Management Area including – Updating and Screening Assessments, Review and Assessment Progress Reports and Detailed Assessments, together with any associated air quality monitoring, atmospheric dispersion modelling studies etc. This section of the questionnaire included three distinct questions.

Question C1: Are there any ways in which the Review and Assessment stages of LAQM have assisted your Council? Of the 239 questionnaires received, 160 respondents (66.9%) provided one or more answers to this question. The coded responses have resulted in the emergence of six main themes. Respondents stated that the Review and Assessment stages of LAQM provide a framework for the assessment and management of local air quality (36%) while also promoting awareness, supporting a local air quality profile and informing decision making (35%). Review and Assessment provides a phased approach and a clear framework (12%) while the statutory nature keeps air quality on the local agenda and helps retain local resources (7%). Respondents also stated that the support tools were helpful (6%). Other miscellaneous responses (4%) highlighted a perceived burden due to repetitive nature of the process and the need for more training opportunities.

Question C2: Are there any particular difficulties you have encountered in undertaking your Review and Assessment duties and what actions have been taken, if any, to resolve them? Of the 239 questionnaires received, 164 respondents (68.6%) provided one or more answers to this question. The coded responses have resulted in the emergence of six main themes. The majority of respondents highlighted the limitations of resources (50%) as the major difficulty. Other themes included difficulties in engaging other agendas and obtaining data (17%), difficulties with the Review and Assessment framework e.g. reporting concerns (12%), technical difficulties such as ratification of data and modelling uncertainties (9%) and difficulties with the support mechanisms such as the late publication of guidance (3%). Other miscellaneous responses (9%) included some local authorities stating that they had identified no major difficulties and examples of problem resolution through the facilitation of partnership working and the use of guidance and helpdesks.

Question C3: What changes would you recommend to make the Review and Assessment process more effective and/or efficient? Of the 239 questionnaires received, 122 respondents (51%) provided one or more answers to this question. The coded responses have resulted in the emergence of five main themes. Suggested changes by respondents include amendments to the Review and Assessment framework e.g. reporting frequency (42%), improvements to the support mechanisms (31%), improvements in engaging with other agendas and departments (12%) and improvements in funding mechanisms (5%). Other miscellaneous responses (10%) included suggestions that the process is already effective and does not require amending.

Section D – Air Quality Management Areas

Section D of the questionnaire provided an opportunity for the respondents to comment on the Air Quality Management Area element of the LAQM process including the selection of the area(s) to declare, the consultation of the Air Quality Management Area and its designation, through to the point of developing the Air Quality Action Plan. This section of the questionnaire included five distinct questions.

Question D1: Is a Local Air Quality Management process based on the designation of Air Quality Management Areas the most appropriate way to bring about air quality improvements at the local level? Of the 239 questionnaires received, 170 respondents (71.1%) answered the quantitative 'Yes'/'No' element of this question, with 123 respondents (72.4%) saying 'Yes, a LAQM process based on the designation of AQMAs is the most appropriate way forward' and 47 respondents

(27.6%) saying 'No'. Of the 239 questionnaires received, 74 respondents (31%) provided additional commentary points. Respondents recognised that an AQMA may bring air quality onto other agendas (18%) but stated that there is a need for an increased role of transport, land-use and local policy (17%). Respondents called for more national input than local input especially in transport management (14%) and a more positive input from LTP (3%). Some respondents suggested that AQMAs are only suitable for local sources (12%) and AQMAs are only suitable for transport source not point source (2%).

Question D2: Has your Council declared an Air Quality Management Area? Of the 239 questionnaires received, 204 respondents (85.4%) answered this question - 131 respondents (64.2%) said 'Yes, their Council had declared an AQMA', 73 respondents (35.8%) said 'No'. When the list of questionnaire respondents was cross-referenced against the national AQMA database (managed by the Review and Assessment Contract Team on behalf of Defra and the Devolved Administrations), 148 respondents (61.9%) had declared one or more AQMAs and 91 respondents (38.1%) had not declared. This split is representative of the national picture, where, as of October 2009, 58% of local authorities in the UK had a current AQMA.

Question D3: What are the main sources of pollution leading to the declaration of your Air Quality Management Area? Of the 239 questionnaires received, 133 respondents (55.6%) answered this question. The predominant source was identified as road transport (mainly local roads) with industrial and domestic sources either being unlikely to significantly influence air quality or affecting background concentrations (this reflects the UK perspective). Other sources identified include airports, mixed sources, commercial and/or construction, high background concentrations, shipping and transboundary pollution.

Question D4: Has the declaration of an Air Quality Management Area helped your Council in addressing air quality problems? Of the 239 questionnaires received, 120 respondents (50.2%) provided one or more answers to this question. The coded responses have resulted in the emergence of six main themes. Respondents stated that the declaration of an AQMA provided information for other agendas/departments (33%) and has helped in raising the profile of air quality (28%). Additionally, respondents found that the AQMA declaration has assisted in collating information on local air quality (11%), opened funding opportunities (6%) and allowed for a targeted approach in relevant areas (3%). Conversely, some respondents stated that the declaration of an AQMA had not been helpful but rather an additional drain on resources (19%).

Question D5: Have you encountered any difficulties during the declaration of your Air Quality Management Area or subsequently and what actions have been taken, if any, to resolve them? Of the 239 questionnaires received, 95 respondents (39.7%) provided one or more answers to this question. The coded responses have resulted in the emergence of five main themes. Respondents reported a lack of local support and understanding among decision-makers (37%), some specific technical difficulties such as declaration timescales, data uncertainties etc (24%), a lack of dedicated resource (9%) and difficulties dealing with development control and the perception of planning blight (5%). Conversely, some respondents stated that they had encountered no difficulties during the declaration of their AQMA or subsequently (25%).

Section E – Air Quality Action Plans

Section E of the questionnaire provided an opportunity for the respondents to comment on the Air Quality Action Planning element of the LAQM process, in particular any difficulties involved in developing a successful action plan and working with people and groups outside of the air quality team. This section of the questionnaire included nine distinct questions.

Question E1: Has your Council prepared, or is it in the process of preparing an Air Quality Action Plan? Of the 239 questionnaires received, 199 respondents (83.3%) provided a response to this question. Of those that responded, 90 respondents (45.2%) had prepared an Air Quality Action Plan with a further 28 respondents (14.1%) in the process of developing one.

Question E2: How has the development of an Air Quality Action Plan been of use to your Council? Of the 239 questionnaires received, 117 respondents (49.0%) provided one or more answers to this question. The coded responses have resulted in the emergence of seven main themes. Respondents stated that the development of the AQAP had provided focus (23%), facilitated partnership working (23%), raised the profile or air quality (20%), influenced local transport planning (8%), influenced land-use planning (4%) and was a useful tool in securing resources (6%). Some respondents highlighted difficulties encountered during AQAP development (16%) including a lack of funding, limited powers and lack of engagement by other agendas.

Question E3: What have been the main factors that have constrained the development of your Air Quality Action Plan? What actions have been taken, if any, by your Council to resolve them? Of the 239 questionnaires received, 115 respondents (48.1%) provided one or more answers to this question. The coded responses have resulted in the emergence of five main themes. Respondents stated that they had experienced difficulties in engaging others and dealing with conflicting policies (31%), they were restricted by resource constraints (31%), they were restricted by an inability to implement actions (19%) and there was a perception of little support from national organisations e.g. Highways Agency (10%). Some miscellaneous comments (9%) include the recognition of the limited life-span of AQAPs and a lack of quantification of actions.

Question E4: Are there any ways in which the effectiveness of the overall process of Air Quality Action Plan development and implementation could be improved? Of the 239 questionnaires received, 88 respondents (36.8%) provided one or more answers to this question. The coded responses have resulted in the emergence of six main themes. Respondents recognised that the effectiveness of the AQAP process could be improved by more national support and direction (45%), more onus on other agendas to engage with the process (22%), improvements in relationships and communication with others (13%) and the improvements in the provision of dedicated resources (9%). Some respondents identified specific actions (6%) such as a statutory requirement for the implementation of low emission strategies and combining air quality and climate change plans. Other miscellaneous responses (5%) suggested that no improvements were required while others identified improvements specific to their local circumstances.

Question E5: Which department was primarily responsible for drawing up your Air Quality Action Plan? Of the 239 questionnaires received, 120 respondents (50.2%) provided a response to this question. Predominantly, the Council's Environment Team (or equivalent) was responsible for drawing up the Air Quality Action Plan. Many of the respondents stated that keeping responsibility for the

development of an Air Quality Action Plan within the Environmental Health (or equivalent) department would maintain air quality as a priority however some respondents stated that the Air Quality Action Plan development process would benefit from greater input from other departments or agendas particularly those with powers to implement actions on the sources of pollution (e.g. transport departments).

Question E6: Is your Air Quality Action Plan integrated into the LTP? (English Authorities only). Of the 176 English questionnaires received, 87 respondents (49.4%) answered the quantitative element of the question. Of those responses, 55 respondents (63.2%) said 'Yes, their AQAP was integrated into the LTP' and 32 respondents (36.8%) said 'No, their AQAP was not integrated into the LTP'. Of the 239 questionnaires received, 75 respondents (31.4%) provided additional commentary to this question (including some non-English respondents). The coded responses have resulted in the emergence of seven themes. Some respondents stated that maintaining air quality as a priority in LTP is essential (8%) but air quality is not a high enough priority for LTP (22%). Some respondents reported difficulties integrating their AQAP into the LTP due to timetable conflicts (16%) and a perceived lack of interest in air quality among LTP officers (3%). Respondents suggested that the LTP would have little influence on local air quality (8%) other than a positive influence on partnership working (16%).

Question E7: Has a steering group (or any other group to co-ordinate the work) been established to oversee the Air Quality Action Plan? Of the 119 respondents that answered this question 52.9% had established a steering group to oversee the Air Quality Action Plan while 47.1% had not. When the responses were analysed by region it was interesting to note that 100% of Scottish respondents had established a steering group to oversee the action plan but over three-quarters of the London respondents had not established a steering group. No explanation was provided in the questionnaire data for this. The other regions exhibited an approximate 50:50 split between those that had, and those that had not, established a steering group.

Question E8: Have other departments, organisations or groups been integral to the Air Quality Action Plan process (E8a)? Please comment on their involvement (E8b)? Of the 239 questionnaires received, 92 respondents (38.5%) provided information on the departments involved in the Action Plan process. The majority stated that they had engaged with transport colleagues as part of the AQAP steering group (this is to be expected as the majority of AQMAs in the UK are transport related). Other departments and groups which were regularly highlighted as members of the steering group by respondents include planning departments, housing executive, regeneration teams, local councillors, climate change/sustainability teams, council fleet management, local health authority, local residents/pressure groups/NGOs, travel wise teams, Environment Agency, neighbouring authorities and local freight management groups. Some respondents had positive feedback on the level of engagement of transport colleagues but reported difficulties in engaging the correct person, while others reported substantial difficulties in engaging any colleagues. Various barriers for successful integration of other departments/organisations/groups into the AQAP steering group were highlighted, including not engaging with the various departments early enough in the process, lack of priority for other departments and a lack of staff resources.

Question E9: Do you have any views on the role of Air Quality Action Plan Progress Reports? Of the 239 questionnaires received, 84 respondents (35.1%) provided one or more responses to this question. The coded responses have resulted in the emergence of five main themes. There were many positive responses (37%) including the recognition of the role of the AQAP Progress Report in maintaining the

continuity and profile of the AQAP. Other respondents identified difficulties in collating and writing the report (14%), concerns that the report is burdensome and time-consuming (18%), a perceived lack of usefulness (10%), difficulties with report timescales (4%), duplication of effort re LTP Progress Reports (4%) and concerns with the appraisal process (1%). Other miscellaneous responses (13%) suggest that the AQAP should be a 'living' document with regular updates.

Section F – Air Quality and Other Policies

Section F of the questionnaire provided an opportunity for the respondents to comment on the relationship of air quality with other policies, primarily considering transport planning and land-use planning, and also considering the interactions with the health and climate change agendas. This section of the questionnaire included ten distinct questions.

Question F1: Does your Council have a Local Air Quality Strategy (LAQS)? If 'No' please provide reasons why? Of the 239 questionnaires received, 198 respondents (82.8%) provided a quantitative response to this question. Only 65 respondents had a Local Air Quality Strategy (32.8%) with a further 33 respondents (16.7%) currently in the process of developing one. The main reasons stated by respondents for not developing a LAQS include a lack of resources (32%), not a priority as there are no local air quality issues (18%), AQAP also performing the LAQS role (14%), conflicting priorities/lack of local support (11%) and the local authority is already part of a regional strategy (9%). Some miscellaneous comments (16%) provided by respondents include other functions duplicating the role of a LAQS and the perceived advantage of a combined air quality and climate change strategy.

Question F2: If you have a Local Air Quality Strategy, has it assisted you Council (a)? Please describe ways in which your Local Air Quality Strategy has been helpful or not helpful (b)? Of the respondents that answered Part (a) of this question, 73.3% stated that 'Yes, the Local Air Quality Strategy had assisted their Council', while 26.7% stated 'No, the Local Air Quality Strategy had not assisted their Council'. Of the 239 questionnaires received, 55 respondents (23.0%) provided one or more responses to Part (b) of this question. The coded responses have resulted in the emergence of numerous themes. Positive themes identified by respondents include the promotion of awareness (49%), support to LAQM and providing momentum (14%), promotion of regional coordination of activities (7%), assisting in securing resources (3%) and improvement to local air quality (3%). Negative themes identified by respondents include a lack of integration with other policies (9%), a LAQS is not a priority (4%), perception that a LAQS is just a paper exercise (3%) and conflicting regional agendas (1%).

Question F3: Are you consulted adequately on schemes that might have an effect (positive or negative) on air quality? Of the 239 questionnaires received, 185 respondents (77.4%) answered one or more elements of this question. The majority of respondents stated that they are 'Always' or 'Usually' consulted on new planning developments but for transport schemes and biomass or other climate change related proposals there was more uncertainty on the level of consultation undertaken, with a larger proportion of responses being 'Sometimes', 'Rarely' and 'Never'. Other sources consulted upon include Environment Agency/SEPA processes, fugitive sources, PPC and shipping.

Question F4: What steps could be taken to improve inter-departmental relationships relating to air quality within your Council or with other bodies? Of the 239 questionnaires received, 131 respondents (54.8%) provided one or more responses to this question. The coded responses have resulted in the emergence of numerous themes. Respondents identified opportunities for improved engagement with the land-use planning agenda (20%), more lead from a national level (15%), increasing awareness of local air quality activities (11%), improvements consultation/communication/training (9%), improving engagement with the transport agenda (8%), clarification of the roles and responsibilities of other departments (7%), generation of a steering group (6%), improving resources (5%), improvements to upper level engagement in local government (4%) and improving engagement with the climate change agenda (2%), as potential steps to advance inter-departmental relationships. Some respondents provided positive examples of steps taken to improve relations (6%), such as representation of different agendas on working groups, and some miscellaneous comments (7%) suggested assessment should be considered during Comprehensive Area Assessments (CAA).

Question F5: Have you ever sought support from the relevant highways authority in undertaking your LAQM duties? Of the 239 questionnaires received, 168 respondents (70.3%) provided a quantitative response to this question. The majority, 142 respondents, stated 'Yes' they had sought support from a relevant highways authority (84.5%). The coded responses upon the "level of support received" have resulted in the emergence of five themes. Respondents stated that they had engaged with the relevant highways authority to obtain data for LAQM (40%) and the level of support received was predominantly adequate/good (>88%). Respondents stated that they had engaged with the relevant highways authority during AQAP development and implementation (28%) and the level of support received was predominantly adequate/good (>65.5%). Some respondents stated that they had received good support (15%) while others stated the relevant highways authority was difficult to engage (13%).

Question F6: Does your Council have a Supplementary Planning Document/Guidance/Note (or equivalent) on air quality for development control? Of the 239 questionnaires received, 178 respondents (74.5%) provided a quantitative response to this question. Only 39 respondents had a Supplementary Planning Document (or equivalent) (21.9%), with a further 37 respondents (20.8%) currently in the process of developing one. Some respondents stated that their Supplementary Planning Document is a useful air quality management tool (32%) while other respondents stated that while they had a Supplementary Planning Document in place it was in need of improvement (20%).

Question F7: What actions has your Council taken to raise awareness of the link between air quality and health with the public or local health bodies? Of the 239 questionnaires received, 159 respondents (66.5%) provided one or more responses to this question. The coded responses have resulted in the emergence of seven main themes. The majority of respondents have utilised information dissemination tools such as websites, local press and educational initiatives (69%) to raise awareness. Other actions to raise awareness reported by respondents include direct contact with local health bodies (11%), carrying out and consulting on LAQM (9%), informing local strategies and working groups (3%) and undertaking vehicle emissions testing (1%). Some respondents did not undertake any awareness raising (4%) while some miscellaneous actions (3%) included the provision of information at councillor meetings and providing ad-hoc advice upon request.

Question F8: What recommendations would you make for further action in promoting links between air quality and health policies/activities at a local and/or national level? Of the 239 questionnaires received, 91 respondents (38.1%) provided one or more responses to the 'local' element of this question and 66 respondents (27.6%) provided one or more responses to the 'national' element. The coded responses have resulted in the emergence of seven themes for the 'local' recommendations and five themes for the 'national' recommendations. 'Local' recommendations identified by respondents include improved relations with, and requirements for, local health bodies (41%), awareness and profile raising activities (28%), education of the public and addition to the school curriculum (10%), links to other agendas (6%), national changes such as a national indicators and better integration into Local Area Agreements (6%) and improved resources (5%). 'National' recommendations identified by respondents include awareness and profile raising activities (26%), improved links with other agendas (26%), national lead (23%), more responsibility for health bodies to engage with LAQM (21%) and improvements to resources (4%).

Question F9: Can you suggest ways in which links between climate change and air quality responsibilities could be made more efficient and/or effective within your Council/other responsible bodies? Of the 239 questionnaires received, 100 respondents (41.8%) provided one or more responses to this question. The coded responses have resulted in the emergence of seven main themes. Respondents suggested better integration of the agendas (29%), improved engagement between agendas (22%), advanced consideration of co-beneficial options (14%), improvements to national legislation and indicators (10%), more national lead and guidance (9%) and improved awareness of the relationships between agendas (6%). Some miscellaneous responses (10%) highlighted the concern that air quality may get lost within the climate change agenda and this must be avoided.

Question F10: Are there any other comments you would like to make regarding the LAQM process that haven't been address by the questions in this survey. Of the 239 questionnaires received, 55 respondents (23%) provided additional commentary. Many of the points raised re-iterated those identified in the main questionnaire. Reiterated themes include calls for improvements to resources to assist authorities in undertaking their LAQM duties, concerns with process issues including issues with PM_{10} monitoring technique and limitations of time between declaring an AQMA and calls for improvements to national guidance, engagement with other agendas (particularly transport), consideration of time and burden issues for local authorities and recognition of the importance of retaining of the statutory basis of the process.

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1   Introduction

1.1   Air Quality Consultants Ltd (AQC) and the Air Quality Management Resource Centre at the University of the West of England, Bristol (UWE) were commissioned by Defra and the Devolved Administrations to undertake a questionnaire survey of UK local authority air quality practitioners on the Local Air Quality Management (LAQM) process. This survey forms part of a review of the LAQM process commissioned by Defra and being undertaken by In House Policy Consultants (IHPC).

1.2   The purpose of this questionnaire survey is to collate information from local authority officers (with a remit for air quality management) on the strengths/weaknesses of the LAQM process and identify opportunities for improvements to the current process to advance the achievement of National Air Quality Objectives and also assist National Government in achieving the European Union Limit Values.

2   Questionnaire generation and data analysis

2.1   A first-generation questionnaire was created by the Project Team following consultation with a wider stakeholder group consisting of representatives from Defra, the Scottish Government, the Welsh Assembly Government, the Greater London Authority and the Department of Environment, Northern Ireland. A second-generation questionnaire was piloted with a group of local authorities - four from England and one each from Scotland, Wales, London and Northern Ireland. Following feedback from this pilot group a third-generation questionnaire was finalised for circulation to the sample population of local authorities via 'Survey Monkey'[2].

2.2   The majority of the questions in the questionnaire were qualitative (open questions) rather than quantitative (closed questions) in nature. This ensured that the data generated has been used as evidence for theory construction rather than evidence of a pre-existing theoretical position that the reviewer or anyone else may have had. The questionnaire responses were analysed using Grounded Theory Methodology, meaning that the responses were coded according to topics resulting in the emergence of themes and semi-quantitative data. Themes and sub-themes were generated by reviewer's professional experience about those issues that are important in relation to the LAQM process. The coding of responses was undertaken using specialist software called NVivo 8, developed by QSR International and provided to the University of the West of England, Bristol under licence.

2.3   When viewing the graphs generated from the qualitative questions it is important to note that the figures quoted are the number and percentage of references per theme not the number and percentage of responses. This is important as one respondent may provide three separate qualitative responses to a question but within one of these qualitative responses there may be more than one distinct reference. For example, a respondent may state that the *'LAQM process provides a clear framework, detailed Technical Guidance and helps to raise awareness'*. Within this one response there are three distinct references (i.e. to the LAQM framework, the support

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[2] Survey Monkey is a web based tool available at www.surveymonkey.com

mechanisms and raising awareness) and therefore the three distinct references within this single response would be coded under three separate themes.

2.4 At the request of the In-House Policy Consultancy Team undertaking this review of LAQM, no observations, conclusions or recommendations have been generated from the data collated from this questionnaire. Hence the data is presented without any personal observations of the importance or otherwise of one theme over another.

2.5 Questionnaire surveys are one of the more commonly used techniques to collect information and views, due to their overall advantage of conveniently reaching a large number of the defined sample population within a short time. The overall response rate for the survey was 55% (239 out of 433 authorities). This is considered a high response rate for a survey of this type. Given such a high response rate to this questionnaire, the results generated can be considered to be reasonably representative of the total group surveyed. However, caution must be exercised in when considering the results, as the numbers of respondents to the questions tended to drop off through the questionnaire. Some of the later answers will be less representative due to the smaller numbers of respondents.

3   Section A - Introductory Information

3.   Section A of the questionnaire provided an opportunity for the respondents to supply basic information regarding their Council and the resources available to their Council to carry out their LAQM duties.   This section of the questionnaire included five distinct questions and an analysis of the responses for each question is discussed in detailed below (except Question A1 for confidentiality purposes). The following questions were provided:

- A1: Name of the Council?

- A2: Which part of the UK is your Council in?

- A3: How would you describe your Council area?

- A4: Your position in the Council?

- A5: Please provide a short description of the resources available to your Council to carry out your LAQM duties?

3.1   A2: Which part of the UK is your Council in?

3.1.1   A total of 239 questionnaires were received, representing a questionnaire response rate of 55%. This is considered excellent in comparison with similar surveys and in relation to the short time scales involved.   Of the 239 questionnaires received, the majority (74%) were from English respondents, however, when the response rate is illustrated as a percentage of respondents by local authorities within that region it indicates a consistently high response rate across all regions (Figure 1).

Which part of the UK is your Council in?
(Total respondents - 239)

13, 5%

22, 9%

11, 5%

17, 7%

176, 74%

■ England ■ London ■ Northern Ireland ■ Scotland ■ Wales

Which part of the UK is your Council in?
(Percentage of Respondents by Region (Mean 55%))

59%

55%

52%

69%

42%

■ England ■ London ■ Northern Ireland ■ Scotland ■ Wales
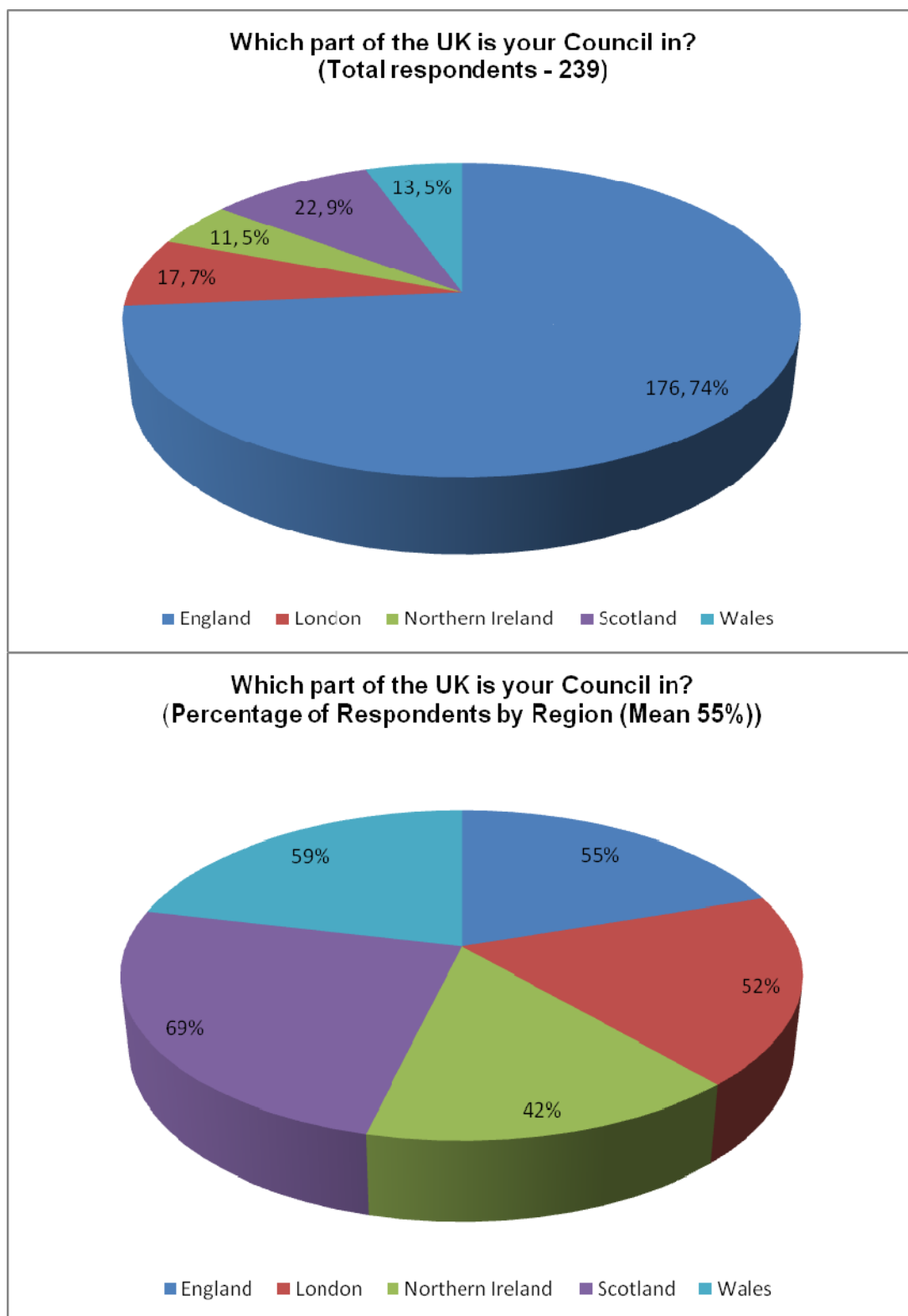
Figure 1: Analysis of respondents by region

3.2   A3: How would you describe your Council area?
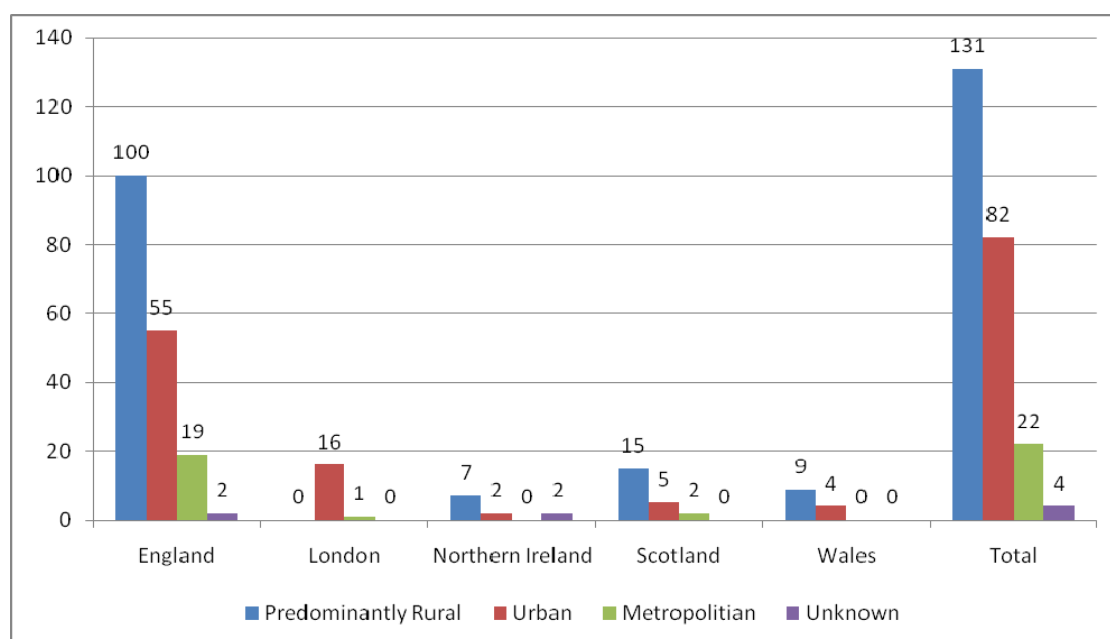
Figure 2: Analysis of respondents by description of Council area.

3.2.1   As illustrated by Figure 2, the majority of respondents (54.8%) described their Council area as predominantly rural in nature. The distribution, however, broadly matches the number of authorities in these categories, so once again the sampling is largely representative[3].

3.3   A4: Your position in the Council?

3.3.1   All of the respondents had an environment related title ranging from Technical Officers to Air Quality Specialists to Principal Environmental Health Officers to Directors of Environmental Health. Some respondents stated in their title that they also had responsibilities for other environmental agendas such as contaminated land and climate change.

3.4   A5: Please provide a short description of the resources available to your Council in carrying out your LAQM duties?

3.4.1   Of the 239 questionnaires received, 229 respondents (95.8%) provided detailed information regarding their available resources. However, the open and amorphous nature of this question has resulted in difficulties in undertaking detailed analysis due to the fragmented and varied nature of the responses.

3.4.2   On average respondents stated that they had two members of staff working on air quality although the Full Time Equivalent (FTE) numbers could not be

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[3] 'Rural' authorities may incorporate large towns but will be predominantly rural in nature.
'Urban' authorities incorporate a continuous area of land which is urban in character e.g. cities.
'Metropolitan' authorities make up part of a larger urban area.

accurately determined the due to the varied nature of responses. The vast majority of respondents (approximately >80%) had received air quality grant monies at some stage to assist them in undertaking their LAQM duties. Many respondents (approximately >65%) stated that they had employed consultants to assist them in undertaking their LAQM duties although the majority stated that this support was for the more technical elements of the process, where the necessary in-house capacities and capabilities did not exists (e.g. monitoring QA/QC, dispersion modelling studies, AQAP scenario testing etc). There was no obvious difference (from the responses received) between the level of resources available to those authorities with, and those without, an AQMA.

4 **Section B - Overview of Local Air Quality Management**

4. Section B of the questionnaire provided an opportunity for the respondents to comment on the main points of LAQM process as a whole rather than on specific elements. This section of the questionnaire included five distinct questions and an analysis of the responses for each question is discussed in detailed below. The following questions were provided:

- B1: What do you identify as the main strengths of the LAQM process as a whole?

- B1: What do you identify as the main weaknesses of the LAQM process as a whole?

- B3: Could any further actions and support be usefully provided by central government to facilitate local authorities in undertaking their LAQM duties?

- B4: What do you identify as the ain changes (including legislative changes) you would like to see implemented to improve the LAQM process as a whole?

- B5: Any other comments?

4.1 B1: What do you identify as the main strengths of the LAQM process as a whole?
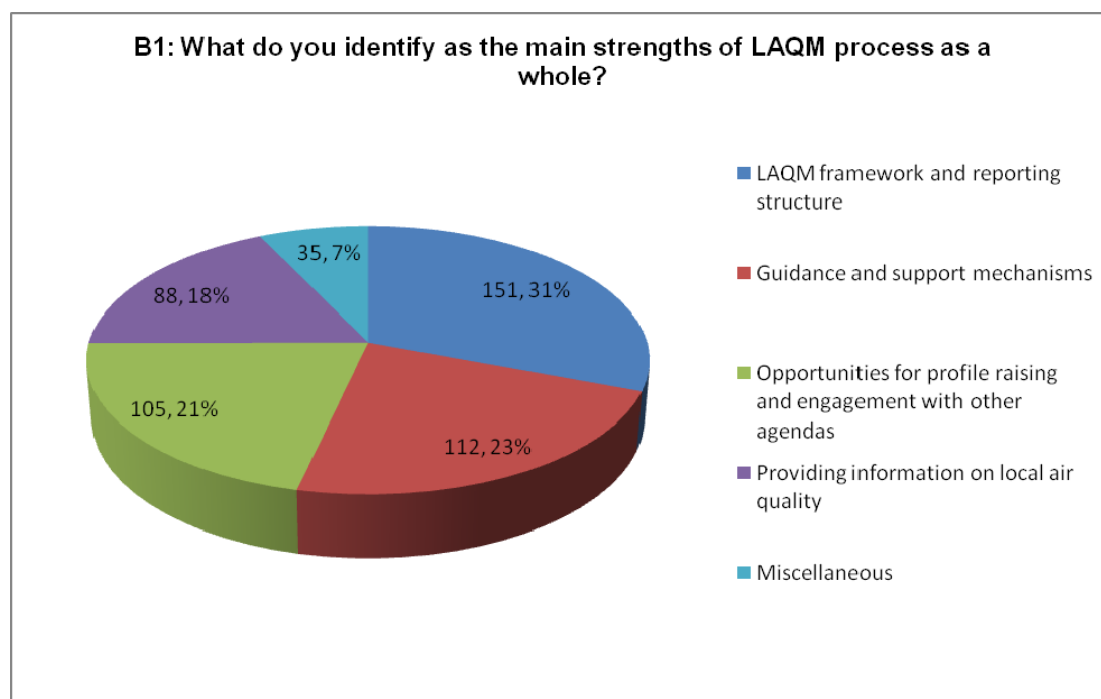
Figure 3: Parent themes from responses to Question B1

4.1.1 Of the 239 questionnaires received, 194 respondents (81.2%) provided one or more answers to this question. The initial parent-theme screening of Question B1 identified five main 'LAQM Strength' topics (Figure 3), including:

- The LAQM framework and reporting structure (31%);

- The guidance and support mechanisms (23%);

- Opportunities for profile raising and engagement with other agendas (21%);

- Providing information on local air quality (18%); and

- Miscellaneous (7%).

4.1.2 The coded responses categorised into these five topics were then re-screening to identify sub-themes as outlined in Figure 4 to Figure 8 below. These sub-themes are discussed in detail below.

4.1.1 B1 Sub-theme: LAQM Strengths – LAQM framework and reporting structure. (31% of total references for this question)
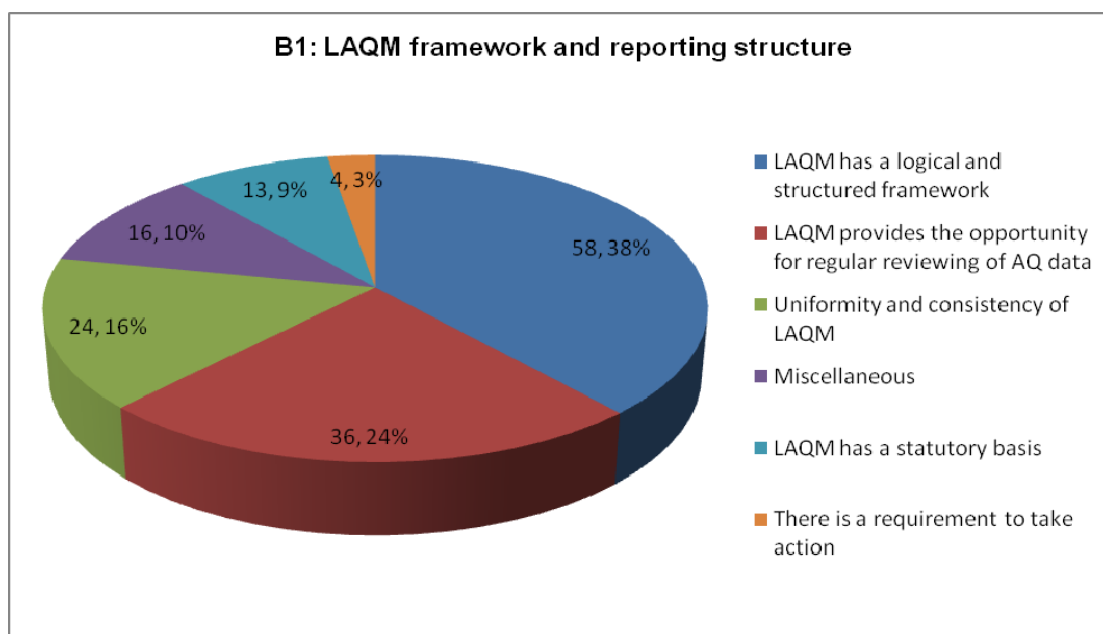
Figure 4: Sub-themes from responses to Question B1 – LAQM framework and reporting structure

4.1.1.1 <u>LAQM as a logical and structured framework (38%)</u>: Respondents identified the structured, logical and phased risk assessment approach to LAQM as one of the main strengths. The phased approach allowed Councils to *"plan ahead"* and provided *"clear focus"* for what is expected of them. LAQM was perceived as a *"proportionate regime"* with the incremental approach allowing for *"better use of scarce resources"*.

4.1.1.2 <u>LAQM provides the opportunity for regular reviewing of air quality data (24%)</u>: Respondents found that the regular reviewing and reporting of air quality data *"ensures that air quality remains a priority"*. The annual document submission *"provides a ready made platform for communicating data to the public"* and the regularity of the process *"strengthens the case to retain budgets"*, *"prevents stagnation"*, *"provides transparency to the process"* and *"highlights changes and new problem areas"*.

4.1.1.3 <u>Uniformity and consistency of LAQM (16%)</u>: Respondent identified the *"standard approach by all local authorities"* as being positive element of the LAQM process. This perceived uniformity in the process was supported by *"guidance to ensure consistent approach"* and *"the systematic listing of factors impacting on air quality"* resulting in *"a national picture to be built up and intercomparison between authorities"*.

4.1.1.4 <u>Miscellaneous (10%)</u>: Respondents identifed other positive elements of the LAQM process including:

- *"New proforma reports are very useful"*;

- *"LAQM decisions based on robust science"*;

- *"Legal background to support the work"*; and

- *"it is transparent and open to public scrutiny"*.

4.1.1.5 <u>LAQM has a statutory basis (9%)</u>: Respondent found the statutory requirements of the process to be very important particularily *"in the current economic climate"*. Some respondents also suggested that if there was not a statutory duty to undertake the process *"it would not be done"*.

4.1.1.6 <u>There is a requirement to take action (3%)</u>: *"There is a requirement to take action in the event of an exceedance at a relevant location"* and therefore *"an obligation to work towards improving air pollution in poor air quality areas"*.

4.1.2 B1 Sub-theme: LAQM Strengths – Guidance and support mechanisms (23% of total references for this question)
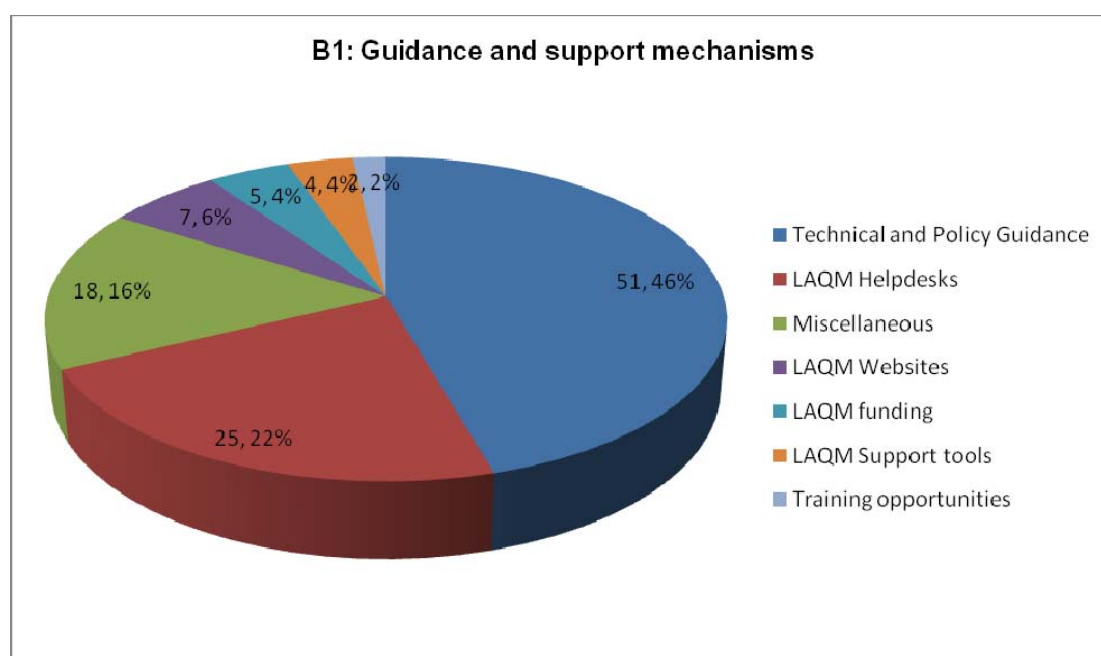
Figure 5: Sub-themes from responses to Question B1 – Guidance and support mechanisms

4.1.2.1 <u>Technical and Policy Guidance (46%)</u>: A substantial number of repondents highlight the *"well defined technical and policy guidance"* as a main strength of the LAQM process. In particular respondents identified *"the clear and logical layout of the new TG(09) guidance particularity with regards to USAs"*, *"the template was useful especially as it was my first year completing the USA"* and *"the guidance is now good on where to look for potential hot-spots"*. Other guidance that was identified as being helpful included the Environmental Protection UK *"Guidance on Development Control and Air Quality"*.

4.1.2.2 <u>LAQM helpdesks (22%)</u>: Respondents stated that the provision of support via the helpdesk was *"an invaluable resource"* which provides *"knowledgeable individuals/groups available for advice and guidance"*.

4.1.2.3 <u>Miscellaneous (16%)</u>: Generally there was backing from respondents for the general *"provision of a good level of support"* and without this air quality could be a *"low priority and forgotten"*.

4.1.2.4 <u>LAQM websites (6%)</u>: Respondents identifed various websites as positive elements of the LAQM process, in particular, *"the online reporting system now reduces the burden on local authorities and simplifies the process"* and *"the Air Quality Archive is an invaluable source of information"*.

4.1.2.5 <u>LAQM funding (4%)</u>: Some respondents stated that undertaking their LAQM duties has *"facilitated procurement of air quality resources"* and the provision of grant aid from central government *"facilitated the in-depth analysis of a local area"*.

4.1.2.6 <u>LAQM support tools (4%)</u>: There was general support among respondents for *"LAQM tools"* and in particular the *"spreadsheet applications re bias adjustment and the ability to upload reports via the internet"*.

4.1.2.7 <u>Training opportunities (2%)</u>: Two respondents identified the provision of *"training events"* and *"regular workshops"* as being supportive of their duties.

4.1.3 B1 Sub-theme: LAQM Strengths – Opportunities for profile raising and engagement with others (21% of total references for this question)
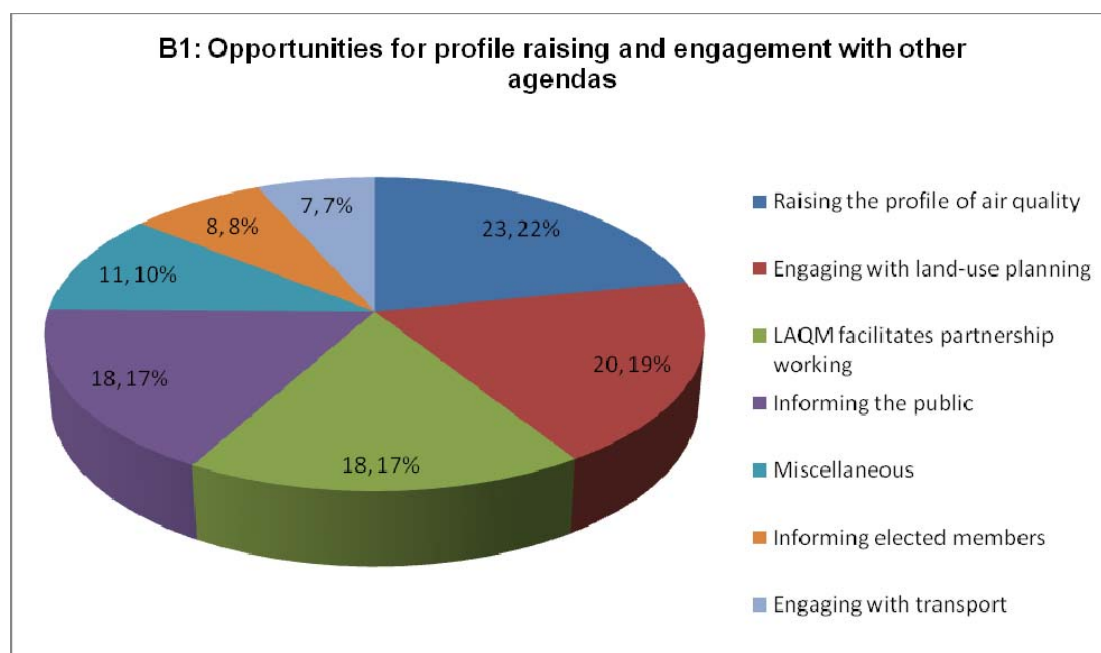
Figure 6: Sub-themes from responses to Question B1 – Opportunities for profile raising and engagement with other agendas

4.1.3.1 <u>Raising the profile of air quality (22%)</u>: Respondents stated that undertaking LAQM resulted in raising the profile of air quality *"amongst the public and elected members"* and *"on different agendas"*. This awareness raising has had the positive influence of making *"local authorities focus on and consider air quality matters"*.

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4.1.3.2 <u>Engaging with land-use planning (19%)</u>: Some respondents found that undertaking LAQM *"helped make informed decisions on the planning process"* and helped to develop *"in-house expertise to handle air quality aspects of planning"*. LAQM, in particular AQMAs, can help by *"putting pressure on developers"* and can allow Councils *"to control, influence and mitigate the impact of developments"* and also *"help identify places where development should be avoided"*.

4.1.3.3 <u>LAQM facilitates partnership working (17%)</u>: Many respondents recognised the importance of the LAQM process in *"encouraging cross-organisational relationships"*. The process supports partnership working both internally (*"provides the impetus to form links with transport planners"*), between local authorities (*"LAQM facilitates closer working of boroughs in regional groups"*), with the public (*"working with community groups to deliver meaningful action"*) and local business and industry (*"created links with local business and puts environment on their agenda"*).

4.1.3.4 <u>Informing the public (17%)</u>: Following on from the theme of facilitating partnership working, many respondents also identified the role the process can have in *"producing information that can easily be made public to inform residents of current and likely future pollution levels at an understandable local level"* and also importantly *"raising awareness of the issues of air quality and its impacts on health"*.

4.1.3.5 <u>Miscellaneous (10%)</u>: Respondents identifed other positive elements of the LAQM process including:

- *"ownership of local air quality issues"*;

- *"providing actual atmospheric data for epidemiological studies"*; and

- *"provide data to allow technical advances in pollution control"*.

4.1.3.6 <u>Informing elected members (8%)</u>: Respondents also identified the importance of *"ensuring that political attention at a local level is paid to air quality"* and that undertaking the process *"raised the profile amongst Councillors and leaders".*

4.1.3.7 <u>Engaging with transport (7%)</u>: Interestingly only a few respondents identfiied the engagement with the transport agenda as a strength of the LAQM process. Those respondents that did highlight this theme recognised the importance of *"LTP to consider air quality measures"* and that LAQM "*provides a platform for transport improvements".*

4.1.4 B1 Sub-theme: LAQM Strengths – Providing information on local air quality (18% of total references for this question)
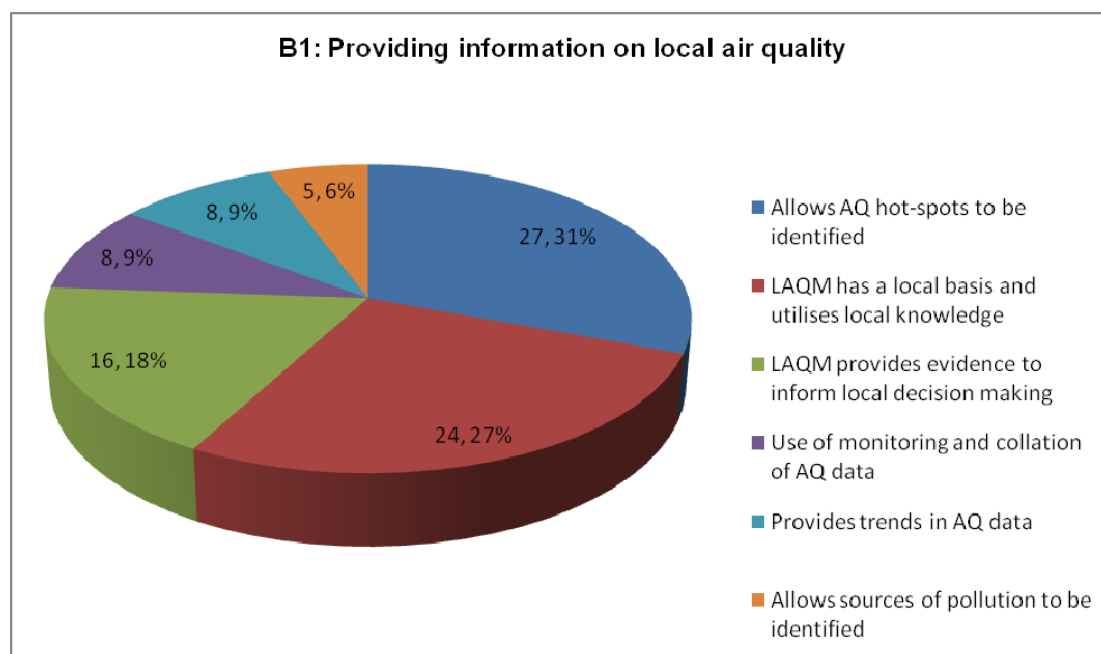
Figure 7: Sub-themes from responses to Question B1 – Providing information on local air quality

4.1.4.1 <u>Allows air quality 'hot-spots' to be identified (31%)</u>: Many respondents recognised the importance of LAQM to *"identify hotspots locally so that local authorities know where resources need to be focused"*.

4.1.4.2 <u>LAQM has a local basis and utilises local knowledge (27%)</u>: Many respondents found the utilisation of local knowledge to be *"invaluable"* as the process supports *"local people dealing with local problems"* and *"local action leading to local improvements"*. Continuation of the local basis of LAQM can also avoid issues being *"missed in larger conglomerates or regional assessments"*.

4.1.4.3 <u>LAQM provides evidence to inform local decision making (18%)</u>: Some respondents stated that LAQM provides *"accurate information for stakeholders to make decisions"* and also *"provide justification for action plan measures"*.

4.1.4.4 <u>Use of monitoring data and collation of air quality data (9%)</u>: LAQM was consider by some respondents to *"encourage good monitoring networks"* and therefore "*enabling the measurement and quanitification of air quality problems"*.

4.1.4.5 <u>Provides trends in air quality data (9%)</u>: Following on from the above theme of monitoring and collation of air quality data, the theme of trends in air quality data was also identified as a strength of the process in that LAQM *"provides a vehicle to demonstrate trends in local air quality"*.

4.1.4.6 <u>Allows sources of pollution to be identified (6%)</u>: Some respondents also recognised that LAQM *"provides data to assess the acceptability of different new sources of key pollutants"*.

4.1.5   B1 Sub-theme: LAQM Strengths – Miscellaneous (7% of total references for this question)
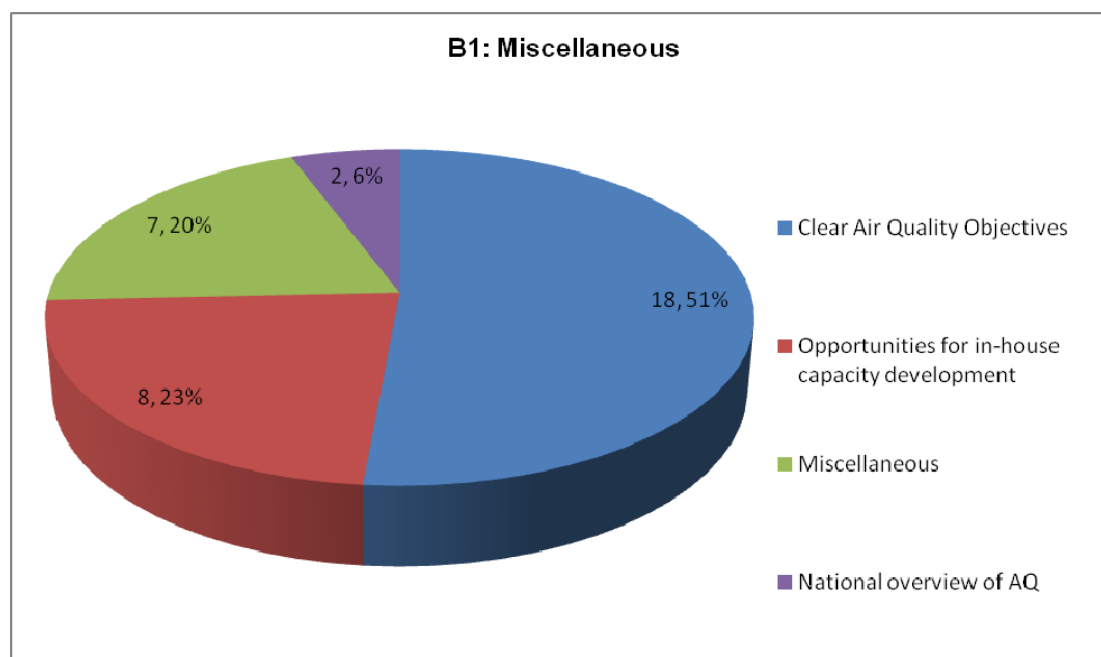
Figure 8: Sub-themes from responses to Question B1 – Miscellaneous

4.1.5.1 <u>Clear Air Quality Objectives (51%)</u>: Of the miscellaneous comments received from repondents the majority considered the provision of health–based air quality standards and objectives to be important as they are *"useful for giving a focus – [the process] would be weak without them"*

4.1.5.2 <u>Opportunities for in-house capacity development (23%)</u>: LAQM has resulted in *"developing our in-house expertise to carry out complex studies rather than contract them out to consultants"*. The LAQM process can *"develop/improve/maintain technical/scientific skills of local authority staff….skills used in other aspects of Pollution Control work (PPC) and to assist/inform planning/development control process (EIAs)".*

4.1.5.3 <u>Miscellaneous (20%)</u>: Some respondents thought there there were no strengths to the LAQM process.

4.1.5.4 <u>National overview of air quality (6%)</u>: Some respondents recognised that the LAQM process can provide a *"national overview of local air quality"*.

4.2   B2: What do you identify as the main weaknesses of the LAQM process as a whole?
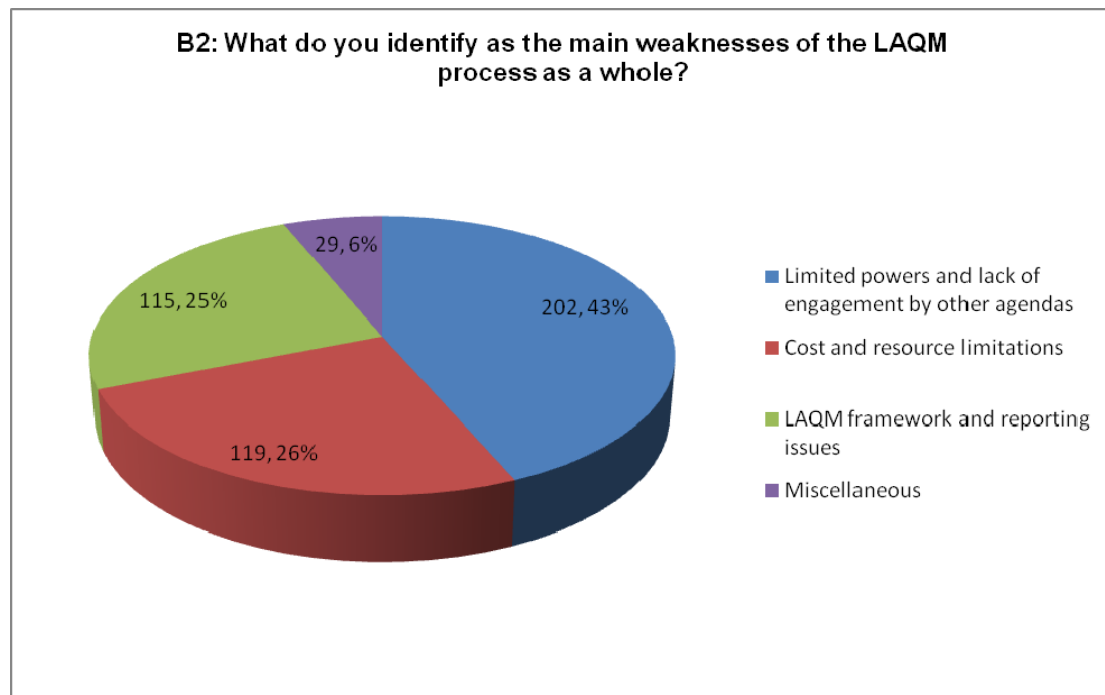
Figure 9: Parent themes from responses to Question B2

4.2.1   Of the 239 questionnaires received, 189 respondents (79.1%) provided one or more answers to this question.   The initial parent-theme screening of Question B2 identified four main 'LAQM Weakness' topics (Figure 9), including:

- Limited powers and lack of engagement by other agendas (43%);

- Cost and resource limitations (26%);

- LAQM framework and reporting issues (25%); and

- Miscellaneous (6%).

4.2.2   The coded responses categorised into these four topics were then re-screening to identify sub-themes as outlined in Figure 10 to Figure 13. These sub-themes are discussed in detail below.

4.2.1 B2 Sub-theme: LAQM Weakness – Limited powers and lack of engagement by other agendas (43% of total references for this question)
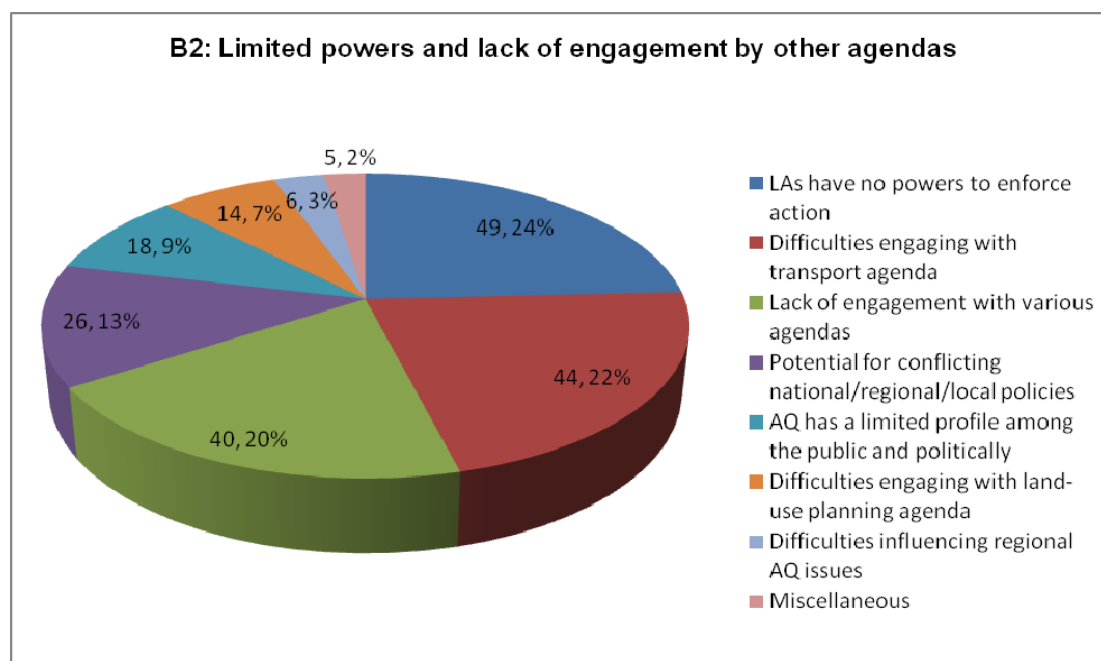
Figure 10: Sub-themes from responses to Question B2 – Limited powers and lack of engagement by other agendas

4.2.1.1 <u>Local authorities have no powers to enforce action (24%)</u>: A common perception of the LAQM process by respondents is that *"local authorities often have no regulatory powers to influence air quality"* with *"no direct control of the source of exceedence e.g. transport"*. Respondents stated that a *"more powerful role and enforcement powers against those causing emissions would be more useful and effective"*.

4.2.1.2 <u>Difficulties engaging with transport agenda (22%)</u>: Respondents also reported a difficulty in engaging with the transport agenda, stating that there was a *"lack of responsibility for those in charge of the sources (e.g. transport planning)"* and *"the only thing we feel we can do is try and influence Highways Agency decisions but everyone has their own agenda so it is very difficult to get air quality taken seriously outside the Environmental Health Department"*.

4.2.1.3 <u>Lack of engagement with various agendas (20%)</u>: Respondent highlighted difficulties in engaging many agendas including transport, planning, health and climate change stating that *"much action is dependent on the force of personality of officers"* and until this lack of integration is addressed *"there will continue to be conflicting priorities with no clear mechanism for resolution"*.

4.2.1.4 <u>Potential for conflicting national/regional/local policies (13%)</u>: Respondents identified conflicting policies as being detrimental to LAQM including the relationships in two-tier authorities *"with County Council not being co-operative and trying to boss the show!"* and the perceived *""lack of consistency and integration between LA measures and national policies"*.

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4.2.1.5 <u>Air quality has a limited profile among the public and politically (9%)</u>: Some respondents highlight the apparent apathy to air quality management among the general public with *"the process not engendering a great deal of interest"*. There is a perception among some respondent of *"public sceptism"* and the LAQM process *"not taken seriously by members or other departments"*.

4.2.1.6 <u>Difficulties engaging with the land-use planning agenda (7%)</u>: Some respondents voiced concerns regarding the engagement of the land-use planning agenda with LAQM stating *"planning guidance etc gives only lukewarm support to the concept of LAQM"* and this is further exacerbated by *"separate working and alternative objectives from different parties"*.

4.2.1.7 <u>Difficulties influencing regional air quality issues (3%)</u>: A few respondents noted the difficulties and *"lack of control over air quality problems originating outside of, but effecting your area"* and one respondent suggesting that *"perhaps a regional element is needed as well as a local one"*.

4.2.1.8 <u>Miscellaneous (2%)</u>: Respondents identifed other weaknesses of the LAQM process including:

- *"the public are committed to climate change and pollution reduction so long as it does not effect their car use"*;

- *"a reaction of 'what can we do about it' similar to that of climate change"*; and

- *"difficult to get support from members for the more contraversial measures in the AQAP"*.

4.2.2 B2 Sub-theme: LAQM Weakness – Cost and resource limitations (26% of total references for this question)
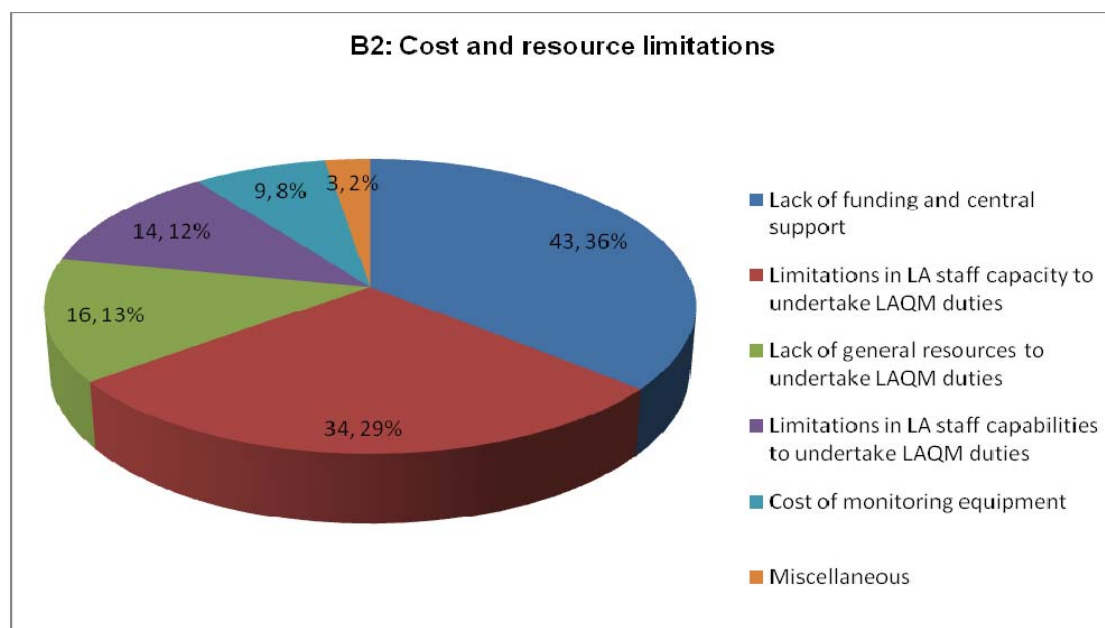
Figure 11: Sub-themes from responses to Question B2 – Cost and resource limitations

4.2.2.1 <u>Lack of funding and central support (36%)</u>: Many respondents stated that there was "*a lack of funds available to help fulfil their statutory roles*" and "*in practice, LAQM would benefit from greater financial support from central government*". Additionally, respondents found that there was an "*increasing need for more resources as you progress through each stage of LAQM*".

4.2.2.2 <u>Limitations in local authority staff capacity to undertake LAQM duties (29%)</u>: Many respondents found the process to be an "*increasing financial and time burden on local authorities so [they] do not have a dedicated LAQM officer*". Although some respondents did identify that changes to the process may assist in reporting burdens e.g. "*tendency for reporting is a burden on time however the new USA process hopefully has sped this up*".

4.2.2.3 <u>Lack of general resources to undertake LAQM duties (13%)</u>: Some respondents stated that there was a "*disproportionate resources required to implement LAQM process against other service demands*" and that the lack of resources has resulted in "*having to rely on consultants*".

4.2.2.4 <u>Limitations in local authority staff capabilities to undertake LAQM duties (12%)</u>: Some respondents found that LAQM required "*much complex work beyond the in-house capabilities of many local authorities*" also highlighting the "*required highly specialist knowledge*" to undertake elements of LAQM and a "*lack of training opportunities*" to build in-house capabilities.

4.2.2.5 <u>Cost of monitoring equipment (8%)</u>: The purchasing, installation and maintainance of monitoring equipment was found by some respondents to be "*expensive and therefore the trend is to reduce the level of monitoring*". Additionally some respondents also reported that "*it is hard to get funding to set up monitoring projects*".

4.2.2.6 <u>Miscellaneous (2%)</u>: Respondents identifed other weaknesses of the LAQM process including:

- "*lack of combined assessment/management of climate change and local air quality*"; and

- "*places the same burden on small rural authorities as large urban authorities*".

4.2.3 B2 Sub-theme: LAQM Weakness – LAQM framework and reporting issues (25% of total references for this question)

B2: LAQM framework and reporting issues

- 1, 1%
- 7, 6%
- 9, 8%
- 16, 14%
- 49, 42%
- 33, 29%

Legend:
- LAQM framework issues
- Reporting inflexibility and burden for LAs
- Objective and pollutant concerns
- Less emphasis on diagnosis and more emphasis on action
- Problems with the appraisal process
- Limitations of AQ legislation
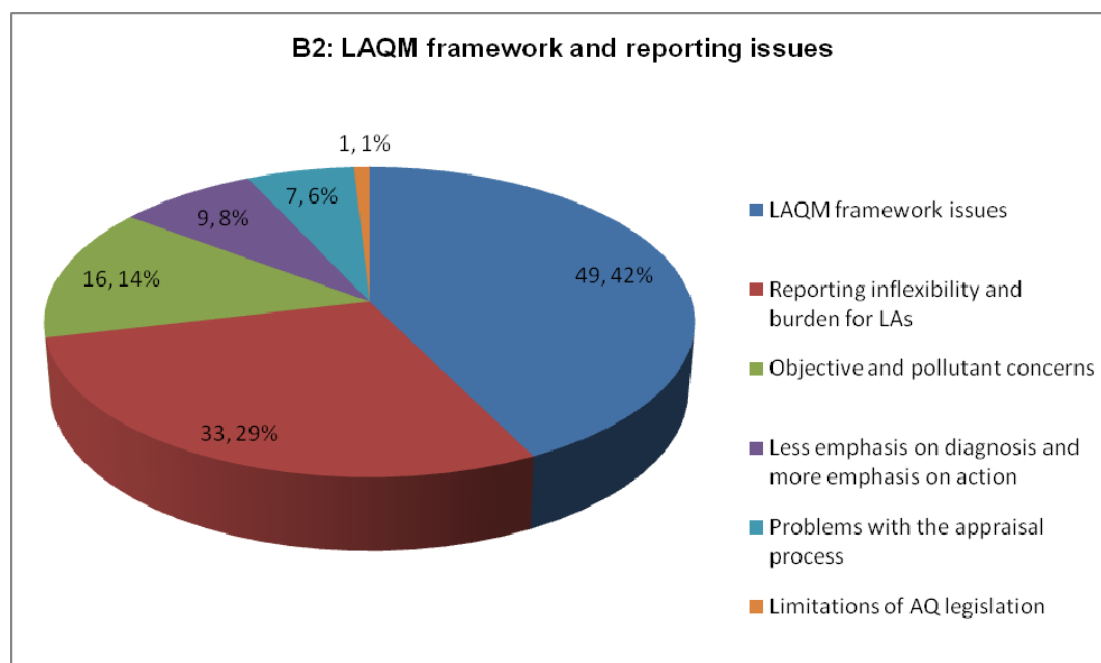
Figure 12: Sub-themes from responses to Question B2 – LAQM framework and reporting issues

4.2.3.1 <u>LAQM framework issues (42%)</u>: Many respondents stated that they found the LAQM process to be "*onerous and bureaucratic*" and can be "*excessively complex with too frequent reporting*". While there was support among respondent for the provision of guidance some found the "*amount of guidance can be daunting and there would be benefits in compiling a document/flowchart detailing how it all 'dovetails' together*". Additionally some respondents called for "*some form of auditing to be introduced to ensure local authorities are carrying out their monitoring correctly*" and that the "*one size fits all approach – does not take account of local circumstances*".

4.2.3.2 <u>Reporting inflexibility and burden for local authorities (29%)</u>: Some respondents stated that they found the "*reporting process to be labour intensive, and to some extent, repetitive*". Additionally some respondents found the "*annual report deadline of the end of April very tight, there is a lot of work involved in gathering information from the previous year, especially were third parties are involved*". Interestingly, of the 32 respondents that identfied a reporting inflexibility and burden for local authorities, 26 (>81%) had declared an AQMA.

4.2.3.3 <u>Objective and pollutant concerns (14%)</u>: Some Scottish respondent voiced their concerns regarding "*unrealistic annual PM$_{10}$ objectives in Scotland leading to the designation of irrelevant AQMAs*" while other respondents thought a weakness of LAQM is that the "*process is limited to the key pollutants*". Additonally while the Air Quality Objectives were seen as benficial a critique of the process is that it "*only considers objectives, so doesn't help if air quality deteriorates but doesn't fail mean objectives*".

4.2.3.4 <u>Less emphasis on diagnosis and more emphasis on action (8%)</u>: Some respondent stated that the process *"concentrates too much on reviewing data and not enough time on taking actions to improve air quality"* and that the imbalance in time spent between Review and Assessment elements and Action Planning elements is *"disproportionate"*.

4.2.3.5 <u>Problems with the appraisal process (6%)</u>: A few respondents requested more *"positive feedback"* in their appraisals and also complained that *"getting feedback from Defra can sometimes take months"*.

4.2.3.6 <u>Limitations of air quality legislation (1%)</u>: One respondent stated that a weakness of the LAQM process is that *"legislation had not been updated to support LAQM"*.

4.2.4 B2 Sub-theme: LAQM Weakness – Miscellaneous (6% of total references for this question)
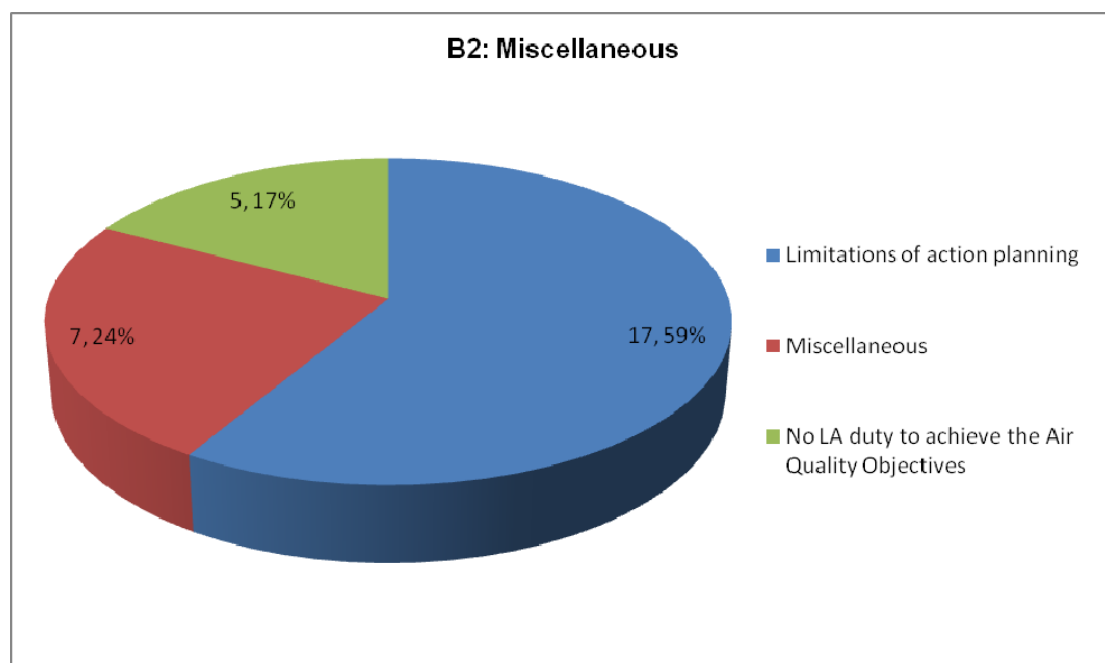
Figure 13: Sub-themes from responses to Question B2 – Miscellaneous

4.2.4.1 <u>Limitations of action planning (59%)</u>: Some respondents echoed the statements previously made regarding the inability of environmental health officers to implement action on air quality. One respondent stated that the action planning process *"did not give the desired outcomes – it's more of a wish list"*

4.2.4.2 <u>Miscellaneous (24%)</u>: Respondents identifed other weaknesses of the LAQM process including:

- *"The whole process"*;

- *"The mismatch between work of the UK government, submissions to the EU and the work in LAQM"*; and

- *"Not very applicable to scenarios in London".*

4.2.4.3 <u>No local authority duty to achieve the Air Quality Objectives (17%)</u>: Some respondents identified the weakness of *"no statutory requirements to meet Air Quality Objectives, therefore other policies/strategies take priority".*

4.3   B3: Could any further actions and support be usefully provided by central government to facilitate local authorities in undertaking their LAQM duties?
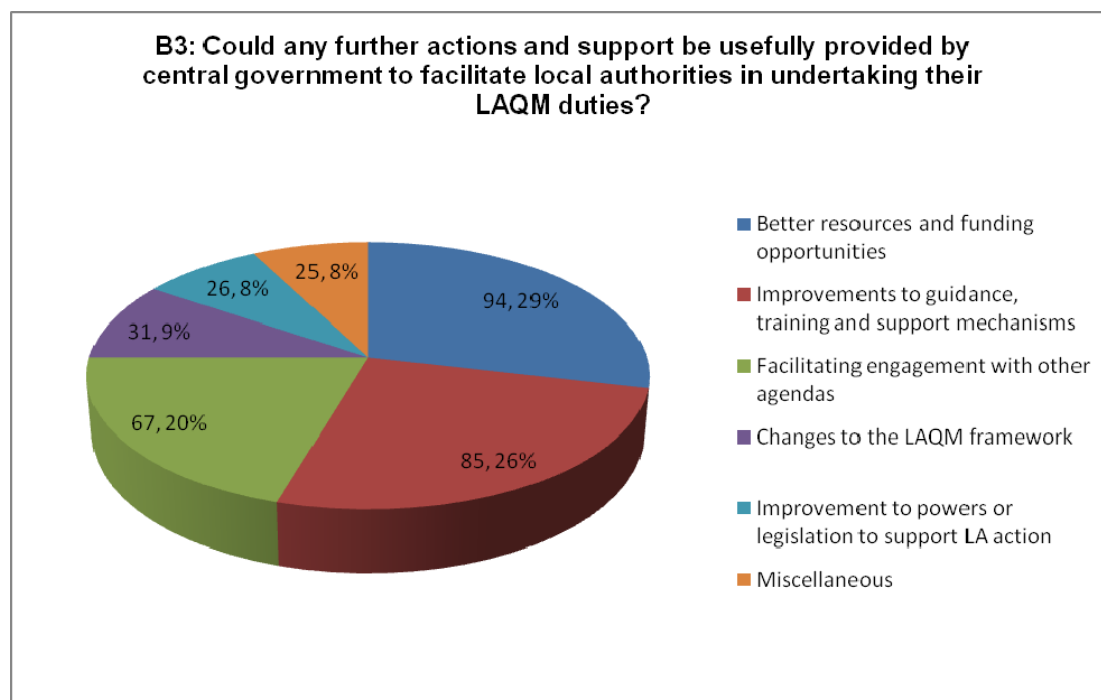
Figure 14: Parent themes from responses to Question B3

4.3.1   Of the 239 questionnaires received, 166 respondents (69.5%) provided one or more answers to this question. The initial parent-theme screening of Question B3 identified six main 'LAQM Actions and Support' topics (Figure 14), including:

- Better resources and funding opportunities (29%);

- Improvements to guidance, training and support mechanisms (26%);

- Facilitating engagement with other agendas (20%);

- Changes to the LAQM framework (9%);

- Improvement to powers or legislation to support local authority action (8%); and

- Miscellaneous (8%).

4.3.2   The coded responses categorised into these six topics were then re-screening to identify sub-themes as outlined in Figure 15 to Figure 19. These sub-themes are discussed in detail below.

4.3.1 B3 Sub-theme: LAQM Actions and Support – Better resources and funding opportunities (29% of total references for this question)
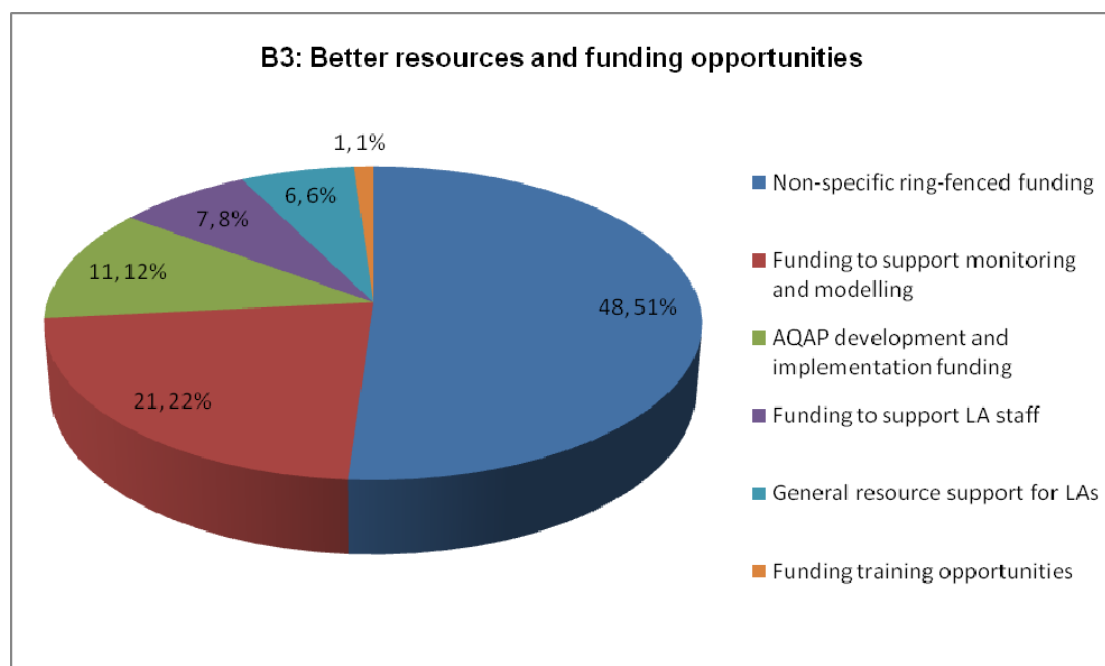
Figure 15: Sub-theme from responses to Question B3 – Better resources and funding opportunities

4.3.1.1 <u>Non-specific ring-fenced funding (51%)</u>: The majority of respondent called for the provision of *"extra ring fenced funding for LAQM"*. Some respondents suggested that funding could be *"offered for specific incentives"* and that Councils need *"more support from central government, because under the current financial climate, air quality is not a high Council priority and could be cut"*. The respondents who identified the need for ring-fenced funding came from all regions (i.e. Councils covered by Defra and the Devolved Administrations).

4.3.1.2 <u>Funding to support monitoring and modelling (22%)</u>: Some respondents specifially suggested that the more expensive elements of LAQM (i.e. monitoring and dispersion modelling) could be further support by central funding. Some respondents suggested a *"central pool"* of monitoring euquipment *"facilitating the provision of inexpensive monitoring equipment for the use of local authorities"*.

4.3.1.3 <u>AQAP development and implementation funding (12%)</u>: Some respondents recognised the need for *"funding for identified realistic schemes that will actually address poor air quality"*.

4.3.1.4 <u>Funding to support local authority staff (8%)</u>: Some respondents suggested that central funding could be provided to support a *"dedicated officer"* while other respondents suggest that may be a place for "*regional support officers*" or a "*pool of government staff"* to support local authorities in *"problem solving and short term jobs"*.

4.3.1.5 <u>General resource support for local authorities (6%)</u>: A few respondents suggested that central government should *"continue financial support,*

through funding helpdesks and grants" but they also requested *"notification of specific funding that may be available".*

4.3.1.6   Funding training opportunities (1%):   A respondent also requested *"more financial support for training".*   The call for more training opportunities was also highlighted in Section 4.3.2 below.

4.3.2   B3 Sub-theme: LAQM Actions and Support – Improvements to guidance, training and support mechanisms (26% of total references for this question)
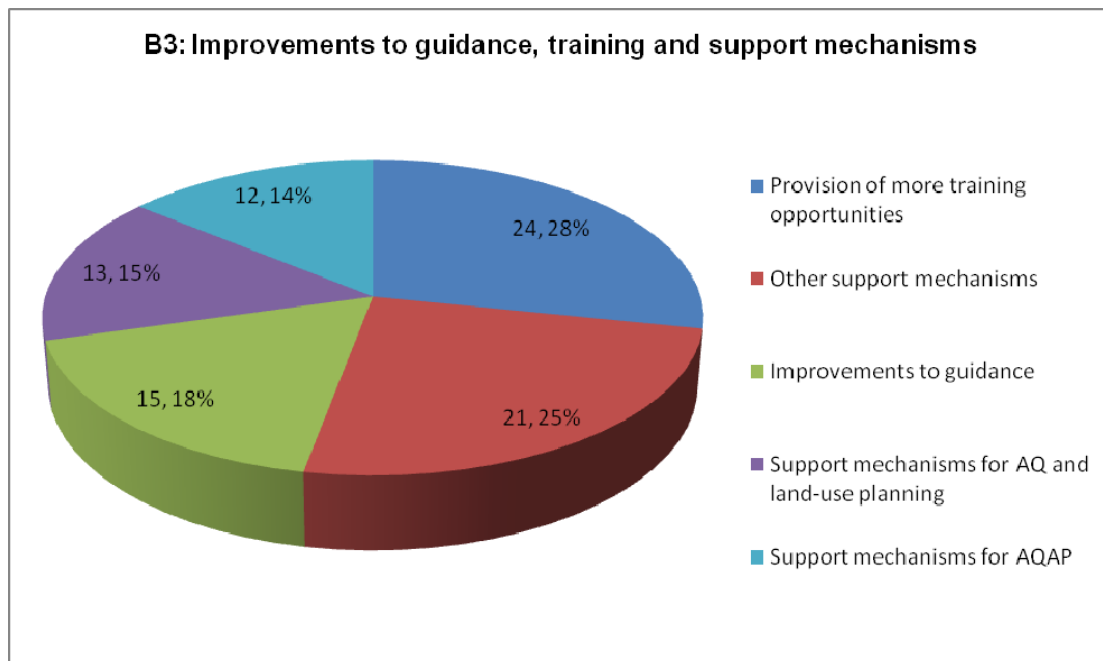
Figure 16: Sub-theme from responses to Question B3 – Improvements to guidance, training and support mechanisms

4.3.2.1   Provision of more training opportunities (28%):   Many respondents recognised the need for more training opportunities including *"regional workshops to promote best practice", "free/low price modelling software with training"* and a *"structured training programme to lead to recognised qualification for new starters in air quality".*

4.3.2.2   Other support mechanisms (25%):   Some respondent identified specific support improvements such as:

- *"tools for assessing quantification of emissions reductions";*

- *"up to date, good quality emissions and information database on alternative fuels/vehicles/boilers e.g. CHP etc";*

- *"Access to a central government approved (and easy to use) dispersion model"* and a *"free detailed air quality modelling software would be very useful";* and

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- *"Establish an equipment bank run by central government where local authorities can borrow monitoring equipment …….rather than have to fund it from existing budgets".*

4.3.2.3 Improvements to guidance (18%): Some respondents identified the need for improvements to different elements of guidance including:

- *"more prescriptive guidance in rolling out low emissions strategies";*

- *"clear unequivocal guidance to assist in development control";*

- *"more robust guidance to County Councils with regards to the formulation of Transport Plans";*

- *"firmer guidance from DfT on air quality for Highways Authorities";*

- *"clarification of the Technical Guidance re biomass burning";*

- *"enhanced guidance on working with other relevant stakeholders to resolve air quality issues";* and

- *"additional support/advice in specific areas e.g. source apportionment".*

4.3.2.4 Support mechanisms for air quality and land-use planning (15%): Some respondents called for *"further help with dealing with planning applications, needs a requirement to be considered as it often comes down only to the judgement of the local planning officer"*. Other respondents suggested that *"significance needed to be readdressed"*, planning departments need to be *"educated on the requirements of LAQM"* and there was a general consensus that *"more centralised planning guidance"* was required to support *"consistent planning decisions"*.

4.3.2.5 Support mechanisms for AQAP (14%): Some respondents identified the need for more support mechanisms in developing and implementing action plans, particularly *"assistance in quantifiying actions"* and that a *"bank of air quality improvement actions that have been deomonstrated to improve air quality"* could also be provided.

4.3.3 B3 Sub-theme: LAQM Actions and Support – Facilitating engagement with other agendas (20% of total references for this question)
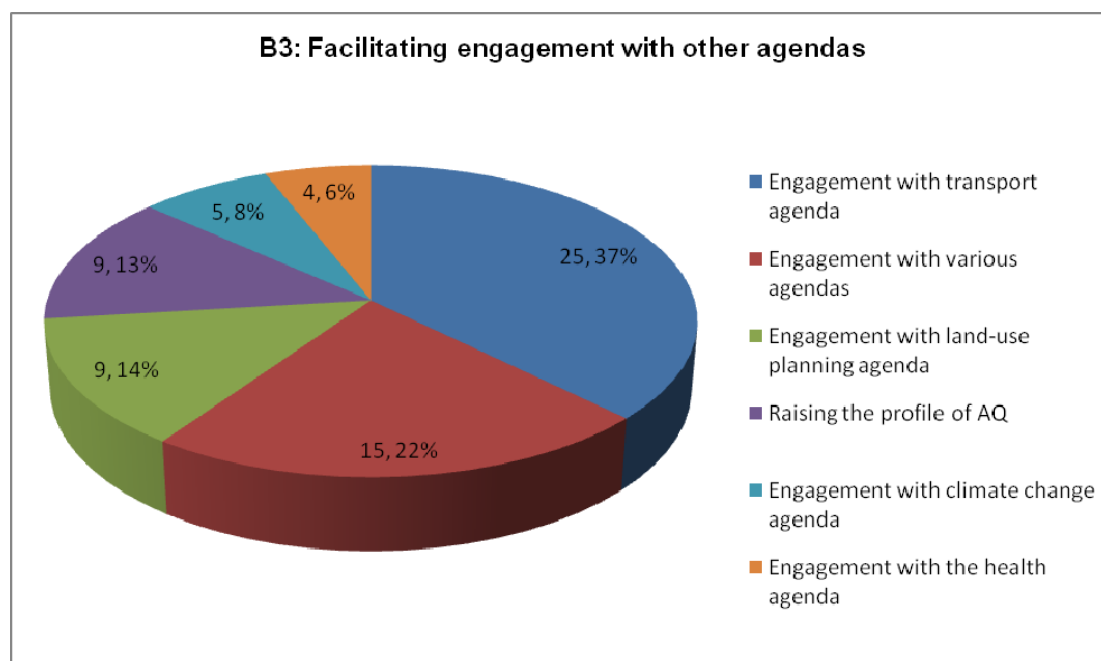
Figure 17: Sub-theme from responses to Question B3 – Facilitating engagement with other agendas

4.3.3.1 Engagement with transport agenda (37%): Many respondents recognised the need for central support in engaging with the transport agenda and with transport departments and colleagues. Some respondents suggested that a *"drive for low emission strategies from central government with a statutory requirement would give more impetus for implementation at a local level", "the Highways Agency needs to prioritise this issue more"* and more *"joined up working from Defra and DfT and pressure/incentives from DfT for local authority transport officers to get involved in air quality management".*

4.3.3.2 Engagement with various agendas (22%): Some respondents identified the need for a *"stronger more focussed national strategy that is integrated into other key strategies"* and in doing so that would potentially provide *"more emphasis on benefits e.g. economic, transport and health benefits"* and can generate "*policies that bring everyone in line, so objectives don't clash".*

4.3.3.3 Engagement with land-use planning agenda (14%): Some respondents suggested that support could be provided by *"raising the profile of air quality and climate change in relation of development control"* while *"a requirements for City Regional Plans and Local Development Plans to seek to improve air quality would be helpful to ensure the planning regimes gives an increased weight to air quality in planning decisions and helps to contribute to the improvement of air quality".*

4.3.3.4 Raising the profile of air quality (13%): Some respondents suggested that the profile of air quality need to to raised particularly *"air quality needs to be high on the political agenda"* and there is a need for *"raising public awareness"*. One respondent suggested that air quality should be *"included in CAA ensuring that Councils actually actively try and improve air quality".*

4.3.3.5 <u>Engagement with climate change agenda (8%)</u>: Some respondents suggested that there should be *"better support and integration of measures so that carbon reduction does not dominate at the expense of air quality"* and that there may be opportunities to "*amalgamate climate change and the air quality agenda by having one action plan for LAQM and NI186*".

4.3.3.6 <u>Engagement with health agenda (6%)</u>: Some respondent linked the need for raising the profile of air quality with engaging the health agenda through vehicles such as *"advertising campaigns to publicise adverse health effects"* and *"raising the priority of health related issues as more on an issue that passive smoking".*

4.3.4 B3 Sub-theme: LAQM Actions and Support – Changes to the LAQM framework (9% of total references for this question)
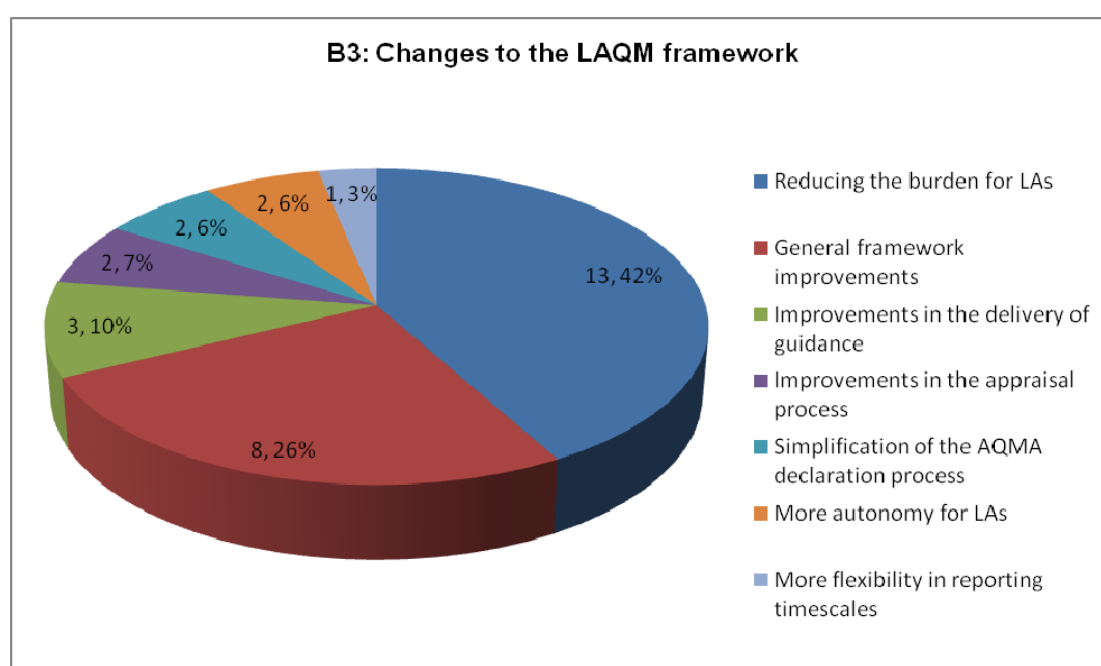
Figure 18: Sub-theme from responses to Question B3 – Changes to the LAQM framework

4.3.4.1 <u>Reducing the burden for local authorities (42%)</u>: Many respondents suggested that there should be a "*reduction in reporting burden*". Some respondent suggested "*extending the use of templates for reports"*, *"nationally based report writing using locally sourced information"* and that *"resources could be better used in action planning".*

4.3.4.2 <u>General framework improvements (26%)</u>: Some respondents suggested some general improvements to the LAQM framework including:

- *"a centralised database of all Detailed Assessments, AQMA Orders, Action Plans which is searchable by pollutant and source";*

- *"ensuring that LAQM remains a key statutory duty, if it doesn't local authorities will stop doing it"; and*

- *"action plan follow-up needs to be strong and determined"*.

4.3.4.3 <u>Improvements in the delivery of guidance (10%)</u>: Some respondent voiced their dissatisfaction regarding the late delivery of guidance *"such as TG(09)"*.

4.3.4.4 <u>Improvements in the appraisal process (7%)</u>: Some respondents suggested that "*the [appraisal] responses can be a bit formal and distant at times*" and a "*quicker turn around with feedback"* would be appreciated.

4.3.4.5 <u>Simplification of the AQMA declaration process (6%)</u>: A few respondents thought the AQMA declaration procedure could be "*streamlined"* and one respondent suggested a *"series of increasing severity declarations e.g. declare yellow AQMA when levels approach the objective, following by amber AQMA (where levels marginally exceed the objective) and then finally a red AQMA"*. In doing so it would allow the local authority consider preventative actions at a earlier stage and flag up priorities for other departments.

4.3.4.6 <u>More autonomy for local authorities (6%)</u>: Two respondents suggest that local authorities should be give more "*time and autonomy to innovate"*.

4.3.4.7 <u>More flexibility in reporting timescales (3%)</u>: A respondent identified the need for "*more flexible/practical timesclaes for deadlines, reporting etc*".

4.3.5 B3 Sub-theme: LAQM Actions and Support – Improvement to powers and/or legislation to support local authority action (8% of total references for this question)
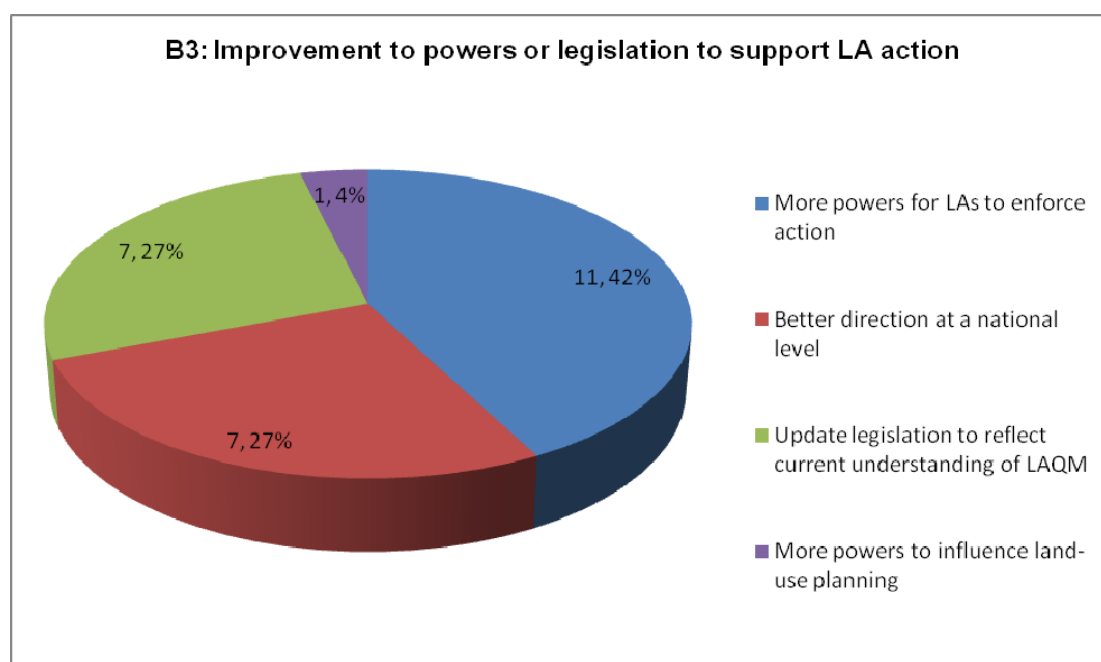
Figure 19: Sub-theme from responses to Question B3 – Improvement to powers or legislation to support LA action

4.3.5.1 <u>More powers for local authorities to enforce action (42%)</u>: Some respondents identified the need for more powers as they *"rely too much on*

negotiation and pursuasion so there is no consistency across authorities" and that central government should "*ensure persons with the powers to affect change are given the requirements to do so*".

4.3.5.2 Better direction at a national level (27%): Some respondent called for better direction from national goverement particularily in achieving the air quality objectives. Some suggested that national government should "*set targets, timeframes and penalties for not achieving air quality objectives*" and that *"decision making should be taken away from local politicians – any local authority that fails to meet the national standards should be made by central government to implement realistic schemes that will make a difference"*.

4.3.5.3 Update legislation to reflect current understanding of LAQM (27%): Some respondents suggested "*updating pollution control legislation to support LAQM*" and that *"legislation should require all relevant bodies to produce plans to deal with air quality once an AQMA has been declared"*.

4.3.5.4 More powers to influence land-use planning (4%): As with Section 4.3.3 there were calls for "*more powers/influence regarding developments through the use of planning guidance"*.

4.3.6 B3 Sub-theme: LAQM Actions and Support – Miscellaneous (8% of total references for this question)

4.3.6.1 Some respondents identified general improvements such as:

- *"I think the support is generally very good"*;

- *"name & shame poorly performing local authorities to promote further support from within Council"*;

- *"Air Quality Grant scheme has been useful to us in the past and most likely to be in the future"* and

- *"great deal of support already there though to newcomers a little confusing where to go to for what advice"*.

4.4   B4: What do you identify as the main changes (including legislative changes) you would like to see implemented to improve the LAQM process as a whole?
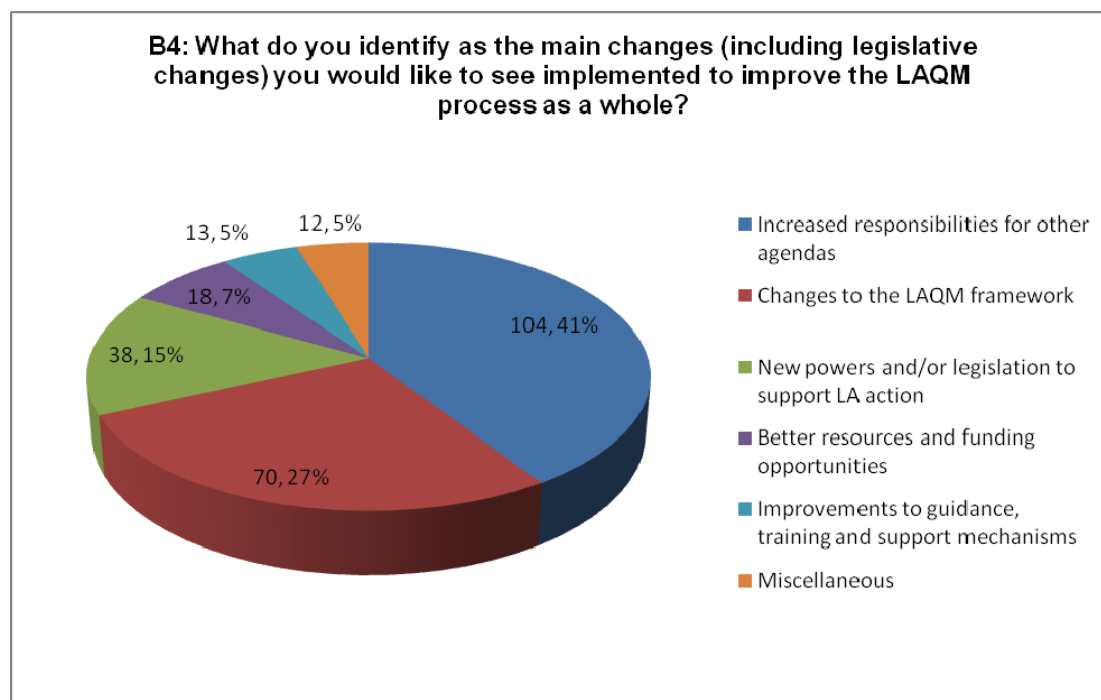
Figure 20: Parent themes from responses to Question B4

4.4.1   Of the 239 questionnaires received, 135 respondents (56.5%) provided one or more answers to this question.   The initial parent-theme screening of Question B4 identified six main 'LAQM Main Changes' topics (Figure 20), including:

- Increased responsibilities for other agendas (41%);

- Changes to the LAQM framework (27%);

- New powers and/or legislation to support local authority action (15%);

- Better resources and funding opportunities (7%);

- Improvements to guidance, training and support mechanisms (5%); and

- Miscellaneous (5%).

4.4.2   The coded responses categorised into these six topics were then re-screening to identify sub-themes as outlined in Figure 21 to Figure 25. These sub-themes are discussed in detail below.   Many of the themes identified following the analysis of Question B4 reiterated the themes identified in the analysis of Question B3.

4.4.1 B4 Sub-theme: LAQM Main Changes – Increased responsibilities for other agendas (41% of total references for this question)

B4: Increased responsibilities for other agendas

- More responsibilities for transport agenda
- Improve relationships with other agendas
- More responsibilities for land-use planning agenda
- Better integration with climate change agenda
- Better links with industry regulation

49, 47%
21, 20%
18, 17%
14, 14%
2, 2%
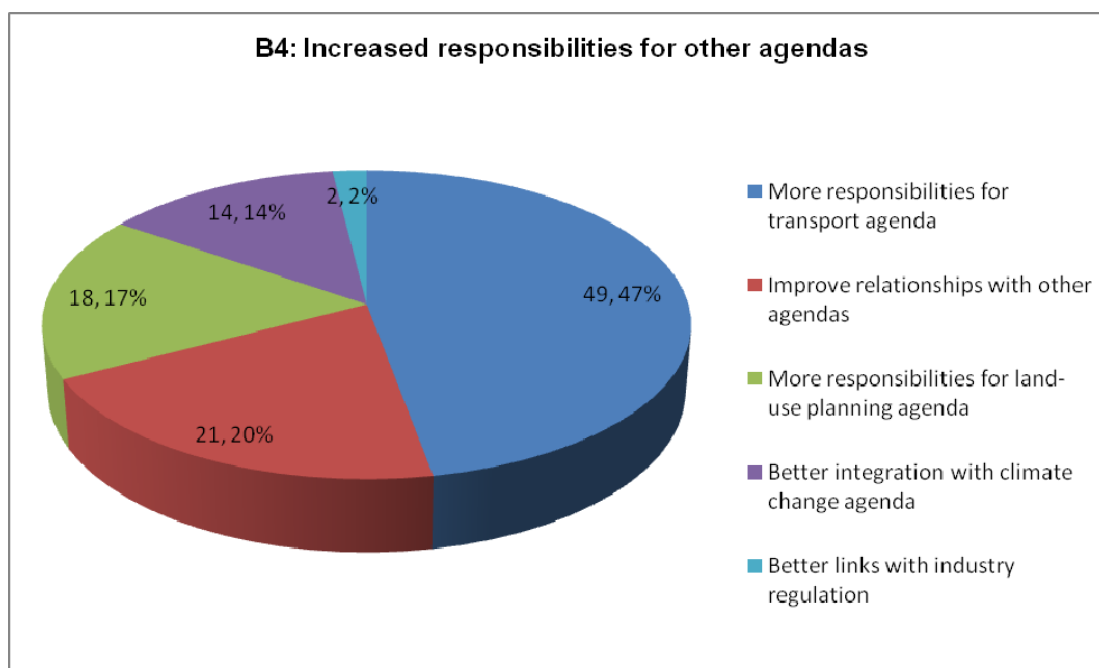
Figure 21: Sub-theme from responses to Question B4 – Increased responsibilities for other agendas (27% of total references for this question)

4.4.1.1 <u>More responsibilities for transport agenda (47%)</u>: As with Section 4.3.3 where engagement with the trasnport agenda was recognised by respondents as a pimary improvement that could be made, many respondents identified the need for more responsibilities for the transport agenda suggesting for example that *"where traffic sources are the main problem ....then County Council should be the lead"*. Additionally there was some suggestions that there should be *"stronger requirements to improve air quality in Local Trasnport Plans"*. Some respondents suggest the transfer of function to the controlling authority for some sources e.g. "*Highways Agency for roads and motorways*", "*CAA/MOD for aircraft*" and "*MCA for more rebust powers to deal with shipping"*.

4.4.1.2 <u>Improve relationships with other agendas (20%)</u>: As with Section 4.3.3, some respondents identified the need for *"more integration between environmental health departments and other partners"*.

4.4.1.3 <u>More responsibilties for land-use planning agenda (17%)</u>: As with Section 4.3.3, some respondents expanded on the need for more responsibilities for the land-use planning agenda including "*make it a legal requirement for all developments to be built with no effect of the locality in terms of emissions"*, *"the need for a strategic approach to assess cumulative impacts of developments on air quality"* and *"developers must provide computed sums from s.106 agreements were existing or predicted air quality levels at relevant receptors will exceed certain levels"*.

4.4.1.4 <u>Better integration with climate change agenda (14%)</u>: The integration of the air quality and climate change agenda was again illustrated by respondents

identifying the need to "*pursue joined-up/synergistic actions/policies which will reduce emissions by increased efficiency and reduced demand*".

4.4.1.5 Better links with industry (2%): One English respondent suggested the need for "*better links to industry*" while a Scottish respondent requested "*improvements in the application of SEPAs regulatory regime*".

4.4.2 B4 Sub-theme: LAQM Main Changes – Changes to the LAQM framework (27% of total references for this question)
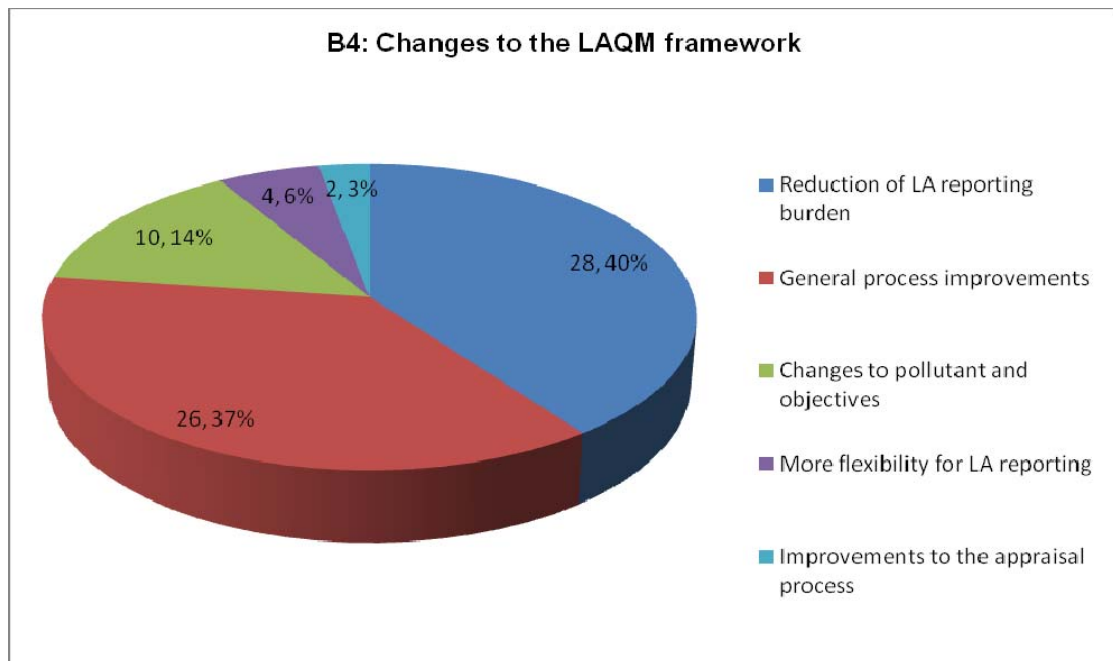
Figure 22: Sub-theme from responses to Question B4 – Changes to the LAQM framework

4.4.2.1 Reduction of local authority reporting burden (40%): As previous identified in Section 4.3.4, some respondents suggested a reduction in reporting burden by potentially introducing a "*risk based process so only those local authorities with significant air quality issues have to submit reports more frequently than those areas where air quality issues and factors affecting air quality remain unchanged*".

4.4.2.2 General process improvements (37%): Some respondents suggested expansion of the "*web-based reporting systems for Detailed Assessment and AQAP Progress Report*" and that the LAQM process could be improved by the "*simplificiation*" of some elements.

4.4.2.3 Changes to pollutant and objectives (14%): Some repondents suggested that the national Air Quality Objectives could be "*aligned more closely with EU Directives*". Some Scottish respondents voiced concerns regarding the "*science behind the levels set by central government*".

4.4.2.4 More flexibility for local authority reporting (6%): Some respondents suggested greater flexibility in the reporting process and this may "*allow a*

more common sense approach once failures have been identified" "within budget constraints".

4.4.2.5 <u>Improvements to the appraisal process (3%)</u>: Again, reiterating the point made in Section 4.3.4, some respondents requested central government *"to get reports turned around quicker"*.

4.4.3 B4 Sub-theme: LAQM Main Changes – New powers and/or legislation to support local authority actions (15% of total references for this question)
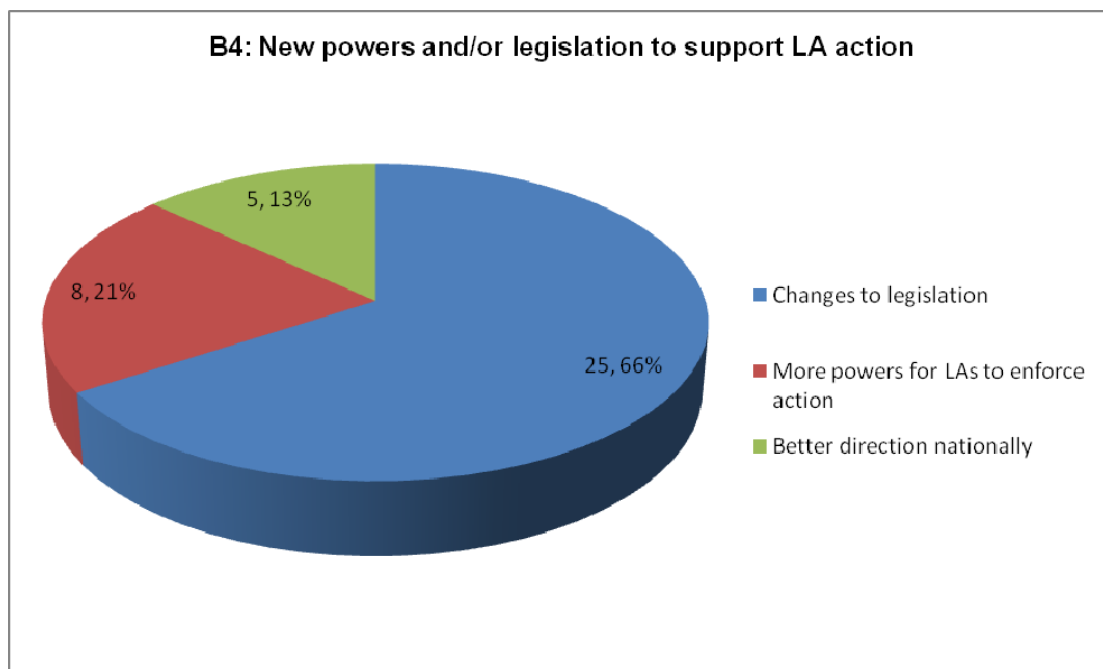
Figure 23: Sub-theme from responses to Question B4 – New powers and/or legislation to support LA action

4.4.3.1 <u>Changes to legislation (66%)</u>: Some legislative changes suggested by respondent included:

- *"update the Clean Air Act, introduce formal controls over construction";*

- *"update pollution control legislation to include larger biomass plants with PPC";*

- *"review the Clean Air Act in line with changes within the LAQM and other policy drivers such as renewables";*

- *"transfer function to Environment Agency for LAQM";* and

- *"a separate Air Quality Act perhaps – which pulls together other cross issues – such as CO_2, CAA"*

4.4.3.2 <u>More powers for local authorities to enforce action (21%)</u>: Respondents suggested more powers to influence *"growth agendas of towns and cities"*,

more powers to "*achieve the desired LAQM outcomes*", more powers in terms of "*planning and other major decisions that directly effect air quality*" and *"more powers with regards to AQMAs and AQAPs*".

4.4.3.3 <u>Better direction nationally (13%)</u>: Some respondent suggested amendments to the national indicators such as "*NI194 currently voluntary but need more weight to encourage Councils to lead by example".*

4.4.4 B4 Sub-theme: LAQM Main Changes – Better resources and funding opportunities (7% of total references for this question)
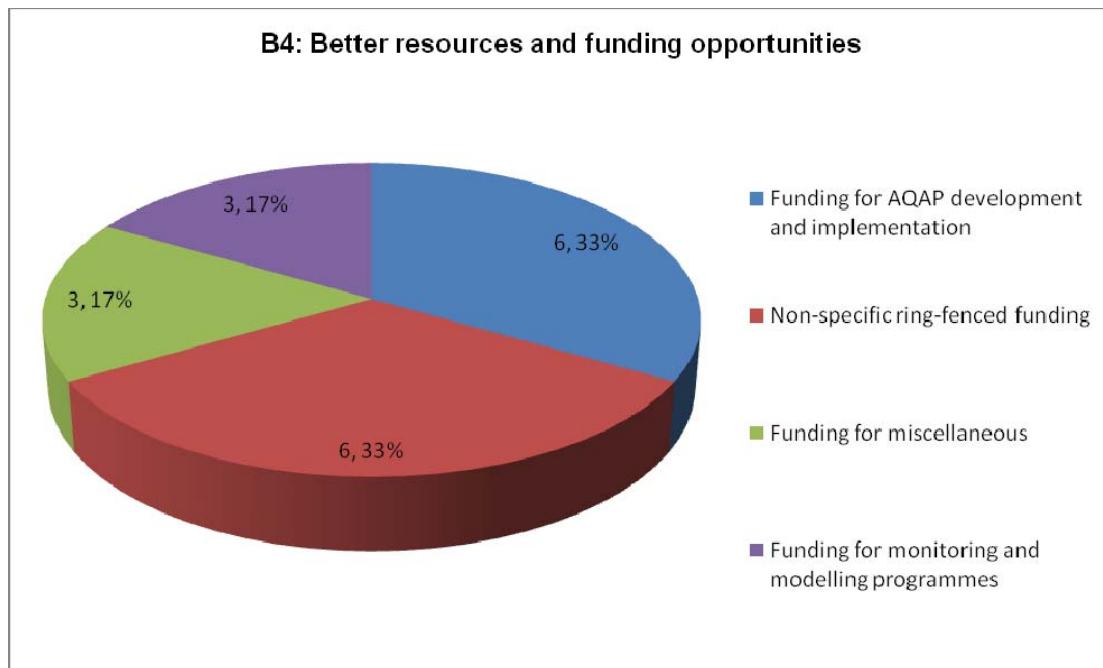
Figure 24: Sub-theme from responses to Question B4 – Better resources and funding opportunities

4.4.4.1 <u>Funding for AQAP development and implementation (33%)</u>: As identified in Section 4.3.1, the call for funding opportunities was reiterated with funding for AQAP development and implementation receiving some responses. Respondents not only identified the need for funding of the AQAP development but also the implementation of specific actions such as "*greater investment in alternative technologies for transport"* and other initiatives such as *"low emission zones, park & ride schemes and transport hubs".*

4.4.4.2 <u>Non-specific ring-fenced funding (33%)</u>: Respondents again identified the need for "*ring fenced budget to ensure the work is properly resourced*".

4.4.4.3 <u>Funding for miscellaneous (17%)</u>: Some specific funding suggestions included monies for compulsory purchase of "*properties badly affected by poor air quality to take them out of residential use"* and *"focus resources on those authorities with a high pollution emission infrastructure".*

4.4.4.4 Funding for monitoring and modelling programmes (17%): Some respondents also requested funding for "*detailed modelling*" and "*funding to extend monitoring locations*".

4.4.5 B4 Sub-theme: LAQM Main Changes – Improvements to guidance, training and support mechanisms (5% of total references for this question)
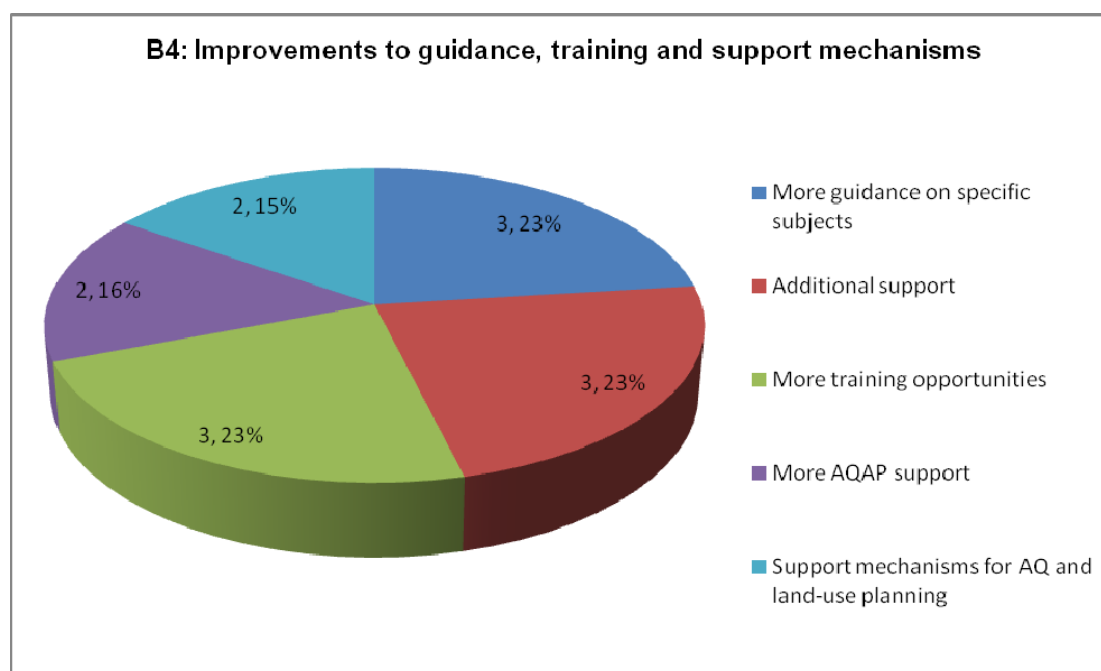
Figure 25: Sub-theme from responses to Question B4 – Improvements to guidance, training and support mechanisms

4.4.5.1 More guidance on specific subjects (23%): Some respondents suggested more guidance on specific subjects including:

- "*tailor the technical guidance …..to better reflect different local authority types*";

- "*a single central guidance document for areas such as planning and air quality, transport and air quality etc for use by consultants and air quality officers*"; and

- "*define sustainability to establish the importance of environmental issues so that it is strong enough to shape change*".

4.4.5.2 Additional support (23%): Some respondents suggested other support elelments including "*annual forums*" and "*access to blog sites where discussion forums can be set up*".

4.4.5.3 More training opportunities (23%): Some respondents reiterated the need for more training opportunities "*given to transport planners to understand air quality problems and to think of solutions*" and the need for a "*minimum professional qualification for officers dealing with air quality*".

4.4.5.4 <u>More AQAP support (16%)</u>: Some respondents reiterated the theme of *"better guidance on quantification of AQAP measures"*

4.4.5.5 <u>Support mechanisms for air quality and land-use planning (15%)</u>: Some respondents reiterated the need for "*expansion of PPS notes*" and "*clear statutory guidance for the planning regime".*

4.4.6 B4 Sub-theme: LAQM Main Changes – Miscellaneous (5% of total references for this question)

4.4.6.1 Some respondents identified general changes such as:

- *"I think legislative infra-structure OK - it changes as necessary;*

- *"there is a need for stronger actions on a national scale to control emissions from transport and the support of increasing / improving the use of public transport";* and

- *"the process appears to be working fine".*

4.5   B5: Any other comments?
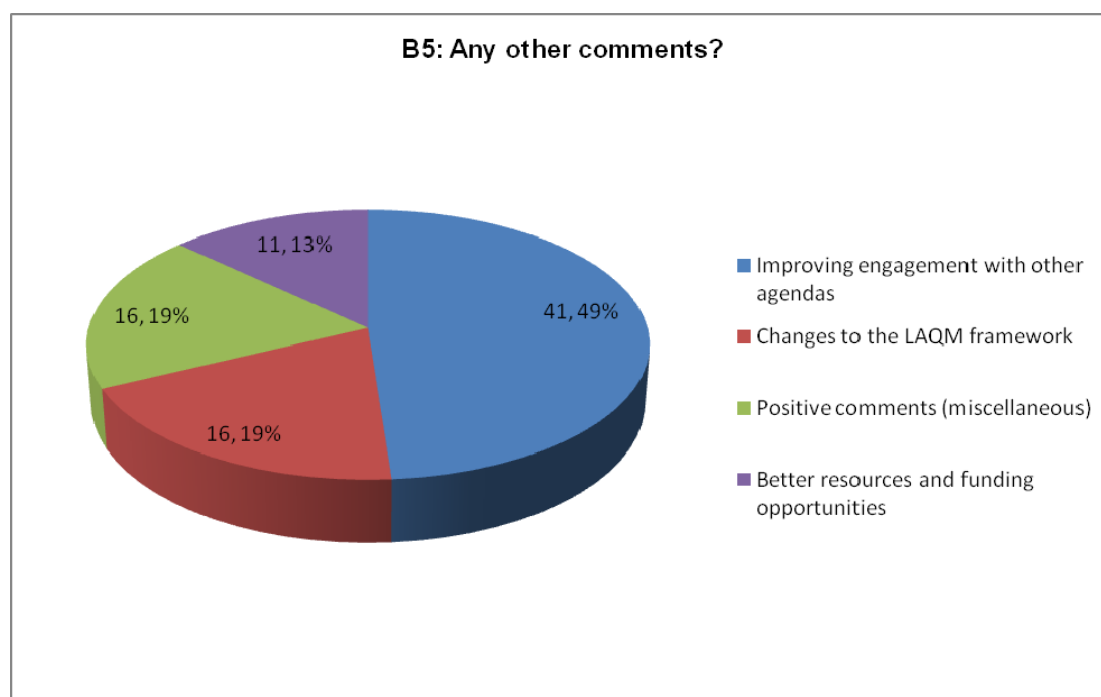
Figure 26: Response themes from responses to Question B5.

4.5.1   Of the 239 questionnaires received, 69 respondents (28.9%) provided additional comments. The coded responses have resulted in the emergence of four main themes as outlined in Figure 26. Many of these additional comments echo statements that had been previously made in response to Questions B1-B4.

4.5.2   Improving engagement with other agendas (49%):   Some respondent re-emphasised the need for improving engagement with other agendas including climate change, land-use planning and transport.

4.5.3   Changes to the LAQM framework (19%): Some respondents reaffirmed the need for some LAQM process changes including the reduction of burden, more emphasis on action rather than diagnosis and concerns over the Scottish PM_{10} air quality objectives.

4.5.4   Positive comments (19%):   Some respondents identified positive elements such as "*the clarity of the technical guidance", "LAQM has worked well up until now to gave air quality a much need profile and create a common way of working*" and support for the *"Welsh Air Quality Forum (funded by the Welsh Assembly) which is a very good and useful resource for Welsh authorities to discuss air quality issues within their boroughs and seek advice or guidance".*

4.5.5   Better resources and funding (13%): Some respondents reaffirmed the need for additional funding to support training and thus develop staff capabilities and capacity to undertake LAQM.

5   Section C - Review and Assessment

5.   Section C of the questionnaire provided an opportunity for the respondents to comment on the Review and Assessment elements of the LAQM process. It covers all aspects of the Review and Assessment process leading up to the point of identifying the need for an Air Quality Management Area including – Updating and Screening Assessments, Review and Assessment Progress Reports and Detailed Assessments, together with any associated air quality monitoring, atmospheric dispersion modelling studies etc. This section of the questionnaire included three distinct questions and an analysis of the responses for each question is discussed in detailed below. The following questions were provided:

- C1: Are there any ways in which the Review and Assessment stages of LAQM have assisted your Council?

- C2: Are there any particular difficulties you have encountered in undertaking your Review and Assessment duties and what actions have been taken, if any, to resolve them?

- C3: What changes would you recommend to make the Review and Assessment process more effective and/or efficient?

5.1 C1: Are there any ways in which the Review and Assessment stages of LAQM have assisted your Council?

C1: Are there any ways in which the Review and Assessment stages of LAQM have assisted your Council?

- Provides a framework for the assessment and management of local air quality
- Promotes awareness, supports a local AQ profile and informs decision making
- There is a phased approach and a clear framework
- Statutory nature keeps AQ on the local agenda and helps retain local resources
- Provision of support tools are helpful (e.g. websites, helpdesks)
- Miscellaneous

19,6% 13,4%
22,7%
37,12%
108,36%
104,35%

Figure 27: Response themes from Question C1.

5.1.1 Of the 239 questionnaires received, 160 respondents (66.9%) provided one or more answers to this question. The coded responses have resulted in the emergence of six main themes as outlined in Figure 27.

5.1.2 Provides a framework for the assessment and management of local air quality (36%): Many respondents identified that the "*review and assessment risk-based approach*" had assisted them in "*identifying areas of concern and thus allowing a targeted approach*" to the management of local air quality. Additionally the process has helped *"identify or discount pollution sources*" whilst also allowing for local authority staff to gain *"experience and knowledge*" while undertaking their duties.

5.1.3 Promotes awareness, supports a local air quality profile and informs decision making (35%): Respondents stated that undertaking Review and Assessment means that they can *"confidently communicate information to all stakeholders (residents, developers, politicians, operators and organisations involved in improving air quality)"*. Other respondents identified that *"collating the data for Review and Assessment made contact with other internal departments vital which has strengthened the local air quality profile"*.

5.1.4 There is a phased approach and a clear framework (12%): Some respondents stated that Review and Assessment *"provides a methodical and consistent framework for assessing air quality"* and therefore "*potential sources can be assessed both proportionally and efficiently"*. Some respondents highlighted the advantages of annual reporting as *"the resources spent on monitoring etc can be justified"* and with a *"lack of resources, the staged approach has made the whole process more realistic"*. Additionally, annual review and assessment reporting *"raise the profile of the subject with members and the public"*.

5.1.5 <u>Statutory nature keeps air quality on the local agenda and helps retain local resources (7%)</u>: Respondents stated that the statutory nature of LAQM has *"enabled us to keep our budgets each year, if there was no timetable this would be very difficult"* and *"provides leverage for resources"*. Having to undertake the Review and Assessment process has *"ensured that air quality remains part of the service plan for the department annually"*.

5.1.6 <u>Provision of the support tools are helpful (6%)</u>: Some respondents identified the support tools as important aspects of Review and Assessment, including:

- *"Support re Technical Guidance, Helpdesks and Workshops have been invaluable"*;

- *"the template reporting format seems to be a good step forward";* and

- *"specific guidance on biomass has been very useful".*

5.1.7 <u>Miscellaneous (4%)</u>: Some respondents did not identify undertaking Review and Assessment as assisting their Council. Responses included:

- *"Initially this was helpful but now the procedure has become to repetitive"; and*

- *"it has highlighted the need for additional training".*

5.2   C2: Are there any particular difficulties you have encountered in undertaking your Review and Assessment duties and what actions have been taken, if any, to resolve them?
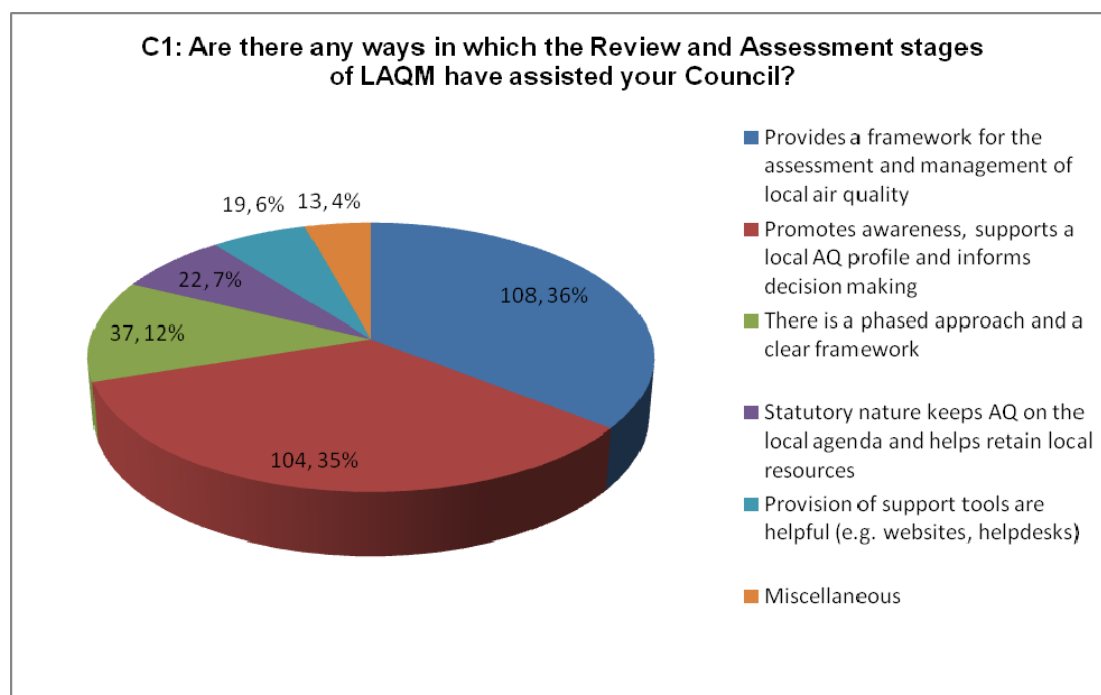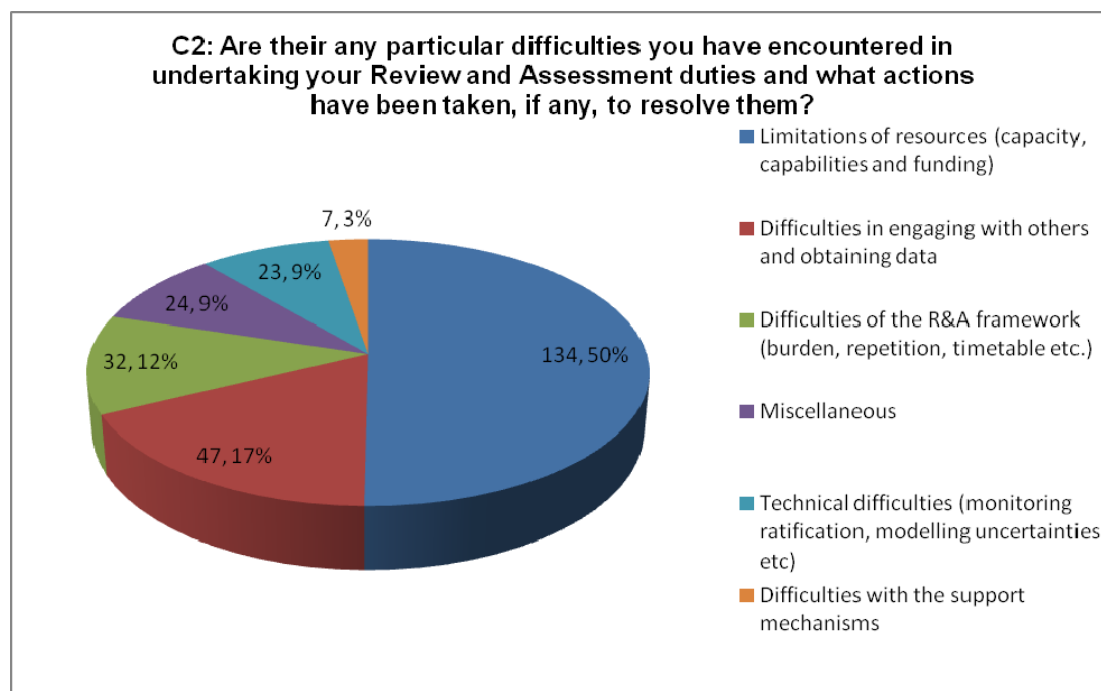

Figure 28: Response themes from Question C2.

5.2.1   Of the 239 questionnaires received, 164 respondents (68.6%) provided one or more answers to this question. The coded responses have resulted in the emergence of six main themes as outlined in Figure 28.

5.2.2   Limitations of resources (50%): The majority of respondents identified resource limitations (staff capacity, staff capabilities, funding etc) as a major constraining factor in undertaking their Review and Assessment duties. *"The main difficulty encountered is a lack of sufficient financial resources to install continuous monitoring stations and carry out assessments. This has been resolved by gaining grant funding".*

5.2.3   Difficulties in engaging others and obtaining data (17%): Some respondents identified the difficulties in meeting reporting deadlines as *"report completion can be delayed due to problems obtaining relevant information from appropriate bodies within requested timescales".* This was resolved by *"establishing better relationships with partners"* but this can be difficult as air quality is *"not a priority"* for other agendas.

5.2.4   Difficulties of the Review and Assessment framework (12%): Some respondent reported difficulties with the timescales for reporting, for example, *"within the same year you could be undertaking a USA, Detailed Assessment, Further Assessment and AQAP Progress Report".* Some respondents stated *"it would be helpful if the process for comments from Defra with regard to submitted reports could be speeded up".*

5.2.5   Miscellaneous (9%): Some respondents reported that they had found *"no major difficulties"* in undertaking Review and Assessment. Other respondents suggested that resolving any difficulties *"has been facilitated by partnership*

working, acquisition of consultants through Defra funding and use of Defra guidance and air quality support/helplines".

5.2.6 <u>Technical difficulties (9%)</u>: Some respondents identified technical difficulties in undertaking Review and Assessment such as carrying out monitoring programmes and dispersion modelling. Some of the issues highlighted include:

- *"time for ratification of data makes it difficult to achieve the timescales for the LAQM process";*

- *"Uncertainties in modelling";* and

- *"Bias correction factors have been too variable to have any confidence in making decisions based on annual mean".*

5.2.7 <u>Difficulties with the support mechanisms (3%)</u>: Some elements of the support mechanisms were identified as problematic by respondents such as *"late guidance puts significant pressure on us"* and *"changes in assessment methodologies in the technical guidance make it difficult to show clear trends".*

5.3   C3: What changes would you recommend to make the Review and Assessment process more effective and/or efficient?
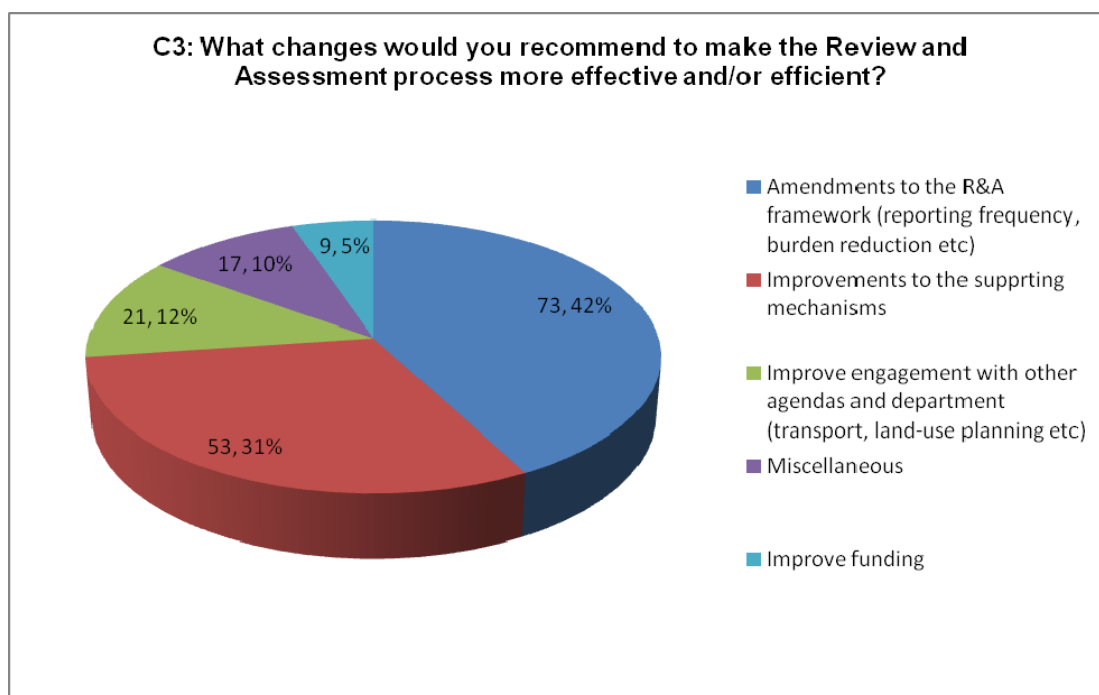
Figure 29: Response themes from Question C3.

5.3.1   Of the 239 questionnaires received, 122 respondents (51%) provided one or more answers to this question. The coded responses have resulted in the emergence of five main themes as outlined in Figure 29.

5.3.2   Amendments to the Review and Assessment framework (42%): As previous highlighted, many respondents identified the need to *"reduce reporting frequency"* and requested *"more autonomy for local authorities to make decisions to prioritise workloads"* but added the caveat that the process *"MUST remain a statutory duty"*.   Other respondents suggested the combination of "*Detailed Assessments and Further Assessments…..saving local authority costs"*.   Other respondents suggested that a *"separate reporting system"* should be established for major urban areas.

5.3.3   Improvements to the supporting mechanisms (31%):   Some respondents provided examples of how the support mechanisms could be improved to make the process more efficient and effective, these included:

- *"pro-forma approach to other stages of review and assessment";*

- *"regional support officer input";*

- *"make the LAQM Officer a statutory appointment";*

- *"improve the Review and Assessment website";* and

- *"more training".*

5.3.4   <u>Improve engagement with other agendas and departments (12%)</u>: Respondents suggested that there should be better *"integration of transport and land-use officers into the process"*. With transport sources there was a common call to *"move responsibility to lie with County Councils and unitary authorities where powers over transport and highways lie"* and an *"increased emphasis on local air quality in government advice to Highways Agency"*.

5.3.5   <u>Miscellaneous (10%)</u>: Some respondents stated that they would make no changes to the process and that the Review and Assessment process *"is already effective and any reduction in requirements may destabilise this"*.

5.3.6   <u>Improve funding (5%)</u>: Some respondents reiterated the need for improvements to funding suggesting *"more frequent windows for Defra Air Quality Grant applications"* and a *"dedicated funding stream for Detailed Assessments should be identified"*.

6 Questionnaire Results: Section D – Air Quality Management Areas

6. Section D of the questionnaire provided an opportunity for the respondents to comment on the Air Quality Management Area element of the LAQM process including the selection of the area(s) to declare, the consultation of the Air Quality Management Area and its designation, through to the point of developing the Air Quality Action Plan. This section of the questionnaire included five distinct questions and the responses of each question are discussed in detailed below. The following questions were provided:

- D1: Is a Local Air Quality Management process based on the designation of Air Quality Management Areas the most appropriate way to bring about air quality improvements at the local level?

- D2: Has your Council declared an Air Quality Management Area?

- D3: What are the main sources of pollution leading to the declaration of your Air Quality Management Area?

- D4: Has the declaration of an Air Quality Management Area helped your Council in addressing air quality problems?

- D5: Hove you encountered any difficulties during the declaration of your Air Quality Management Area or subsequently and what actions have been taken, if any, to resolve them?

6.1   D1: Is a Local Air Quality Management process based on the designation of Air Quality Management Areas the most appropriate way to bring about air quality improvements at the local level?
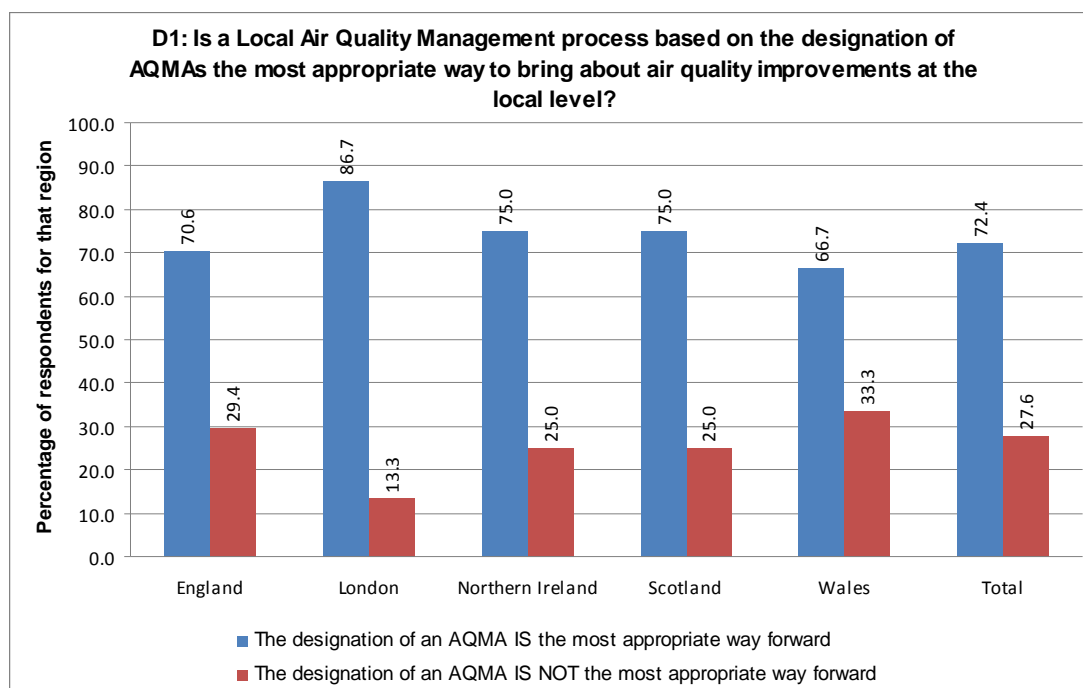
Figure 30: Quantitative response to Question D1 as a percentage by region.
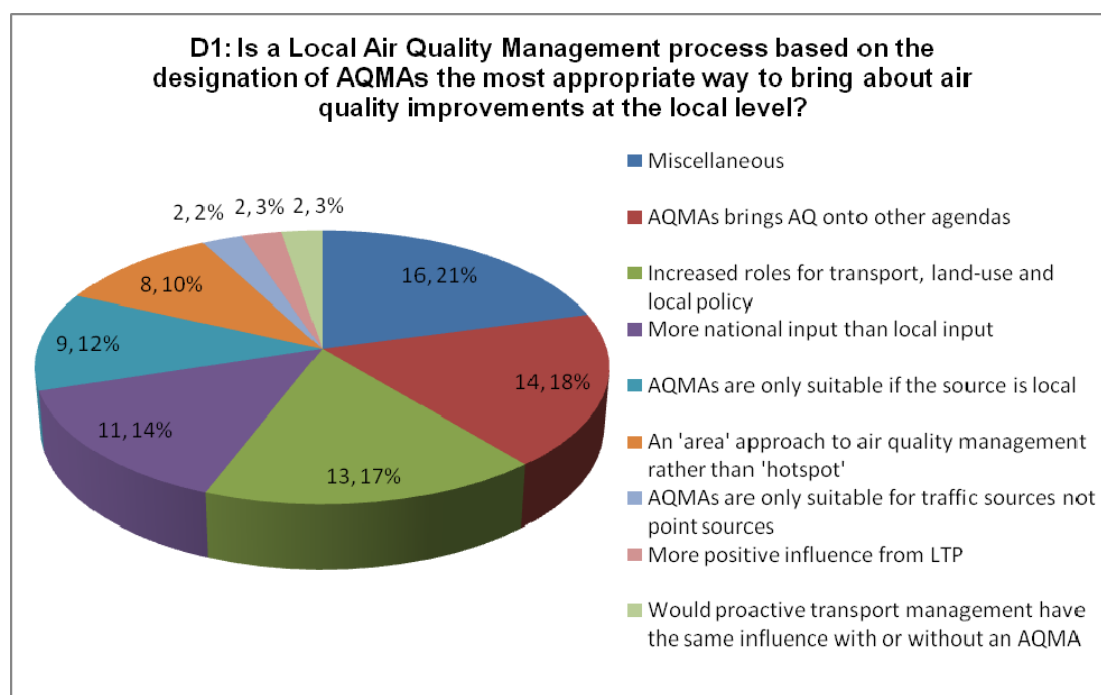
Figure 31: Response themes from Question D1.

6.1.1   Of the 239 questionnaires received, 170 respondents (71.1%) answered the quantitative 'Yes'/'No' element of this question. Of those that responded to the quantitative element, 123 respondents (72.4%) indicated 'Yes, a LAQM

process based on the designation of AQMAs is the most appropriate way forward' and 47 respondents (27.6%) stated 'No' (Figure 30).

6.1.2 Of the 239 questionnaires received, 74 respondents (31%) provided additional commentary points (please note, some respondents declined to answer the quantitative 'Yes'/'No' element of this question but did provide a qualitative response). The coded responses to the qualitative element of this question have resulted in the emergence of nine themes as outlined in Figure 31.

6.1.3 Miscellaneous (21%): Some respondents stated that they had *"insufficient experience"* in AQMAs to be able to provide commentary. Other respondents recognised AQMAs as being *"one tool in the box"* but questioned the ability to actually implement meaningful change once an AQMA is declared.

6.1.4 AQMAs bring air quality onto other agendas (18%): Respondents suggested *"designating an AQMA ensures buy-in throughout the Council as it has to go through officer level and also cabinet approval"* and that declaring an AQMA *"adds greater weight when we are arguing for improvements or against polluting developments"*.

6.1.5 Increased roles for transport, land-use and local policy (17%): Some respondents recognised that while the *"formal designation of AQMAs is useful to focus minds and act as a lever for change"* there is an increased need for pro-active rather than reactive management from other policy agendas suggesting that the *"planning system is a good alternative"* and *"enforceable targets should be set".*

6.1.6 More national input than local input (14%): Respondents suggested that *"central government must work towards traffic reduction and not accept traffic growth as inevitable"*. There was a suggested need for *"accountability and responsibility from regional and national bodies by working in partnership with local government"* and a requirement for *"government pressure"* on technological advances, funding for schemes and recognition by other agendas.

6.1.7 AQMAs are only suitable if the source is local (12%): It was identified by some respondents that an AQMA may only be suitable depending on the causes for the exceedence, for example *"if a local issue then yes [implement a] local solution but if local control will not achieve any improvements in the local air quality then it needs to be a national or regional issue"*.

6.1.8 An 'area' approach to air quality management rather than 'hotpot' (10%): Respondents suggested that there should be a *"percentage reduction across the area rather than just hotspots"* and that the delivery of *"air quality improvements needs to be focussed beyond the boundaries of AQMAs"*.

6.1.9 AQMAs are only suitable for traffic sources not point sources (2%): Respondents stated that AQMAs area suitable where *"pollution is associated with traffic"* but not suitable where *"pollution is associated with industry"*

6.1.10 More positive influence from LTP (3%): Some respondents reiterated the need for the LTP process to seriously consider air quality, suggesting *"all LTP initiatives to have a positive effect on air quality and a requirement to*

demonstrate the effect on emissions" while also highlighting concerns over the "*downgrade*" of air quality in LTP3.

6.1.11 <u>Would proactive transport management have the same influence with or without and AQMA? (3%):</u> One respondent suggested that *"general smart traffic management and congestion reduction strategies would have the same impact if no AQMA as declared"*.

6.2   D2: Has your Council declared an Air Quality Management Area?
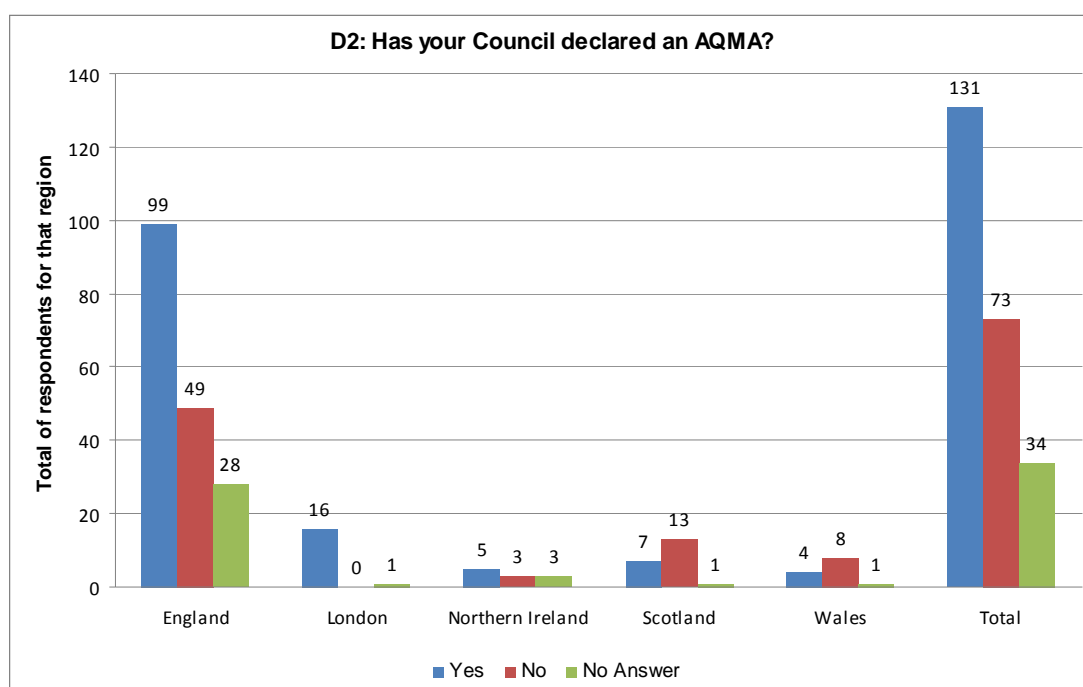
Figure 32: Quantitative response to Question D2 as a total by region

6.2.1   Of the 239 questionnaires received, 204 respondents (85.4%) answered this question - 131 respondents (64.2%) indicated 'Yes', 73 respondents (35.8%) stated 'No' (Figure 32).   Of the 239 questionnaires received, 34 did not include data for this question.

6.2.2   When the list of questionnaire respondents were cross-referenced against the national AQMA database (managed by the Review and Assessment Contract Team on behalf of Defra and the Devolved Administrations), 148 respondents (61.9%) had declared one or more AQMAs and 91 respondents (38.1%) had not declared.   This split is representative of the national picture where, as of October 2009, 58% of local authorities in the UK had a current AQMA.

6.3 D3: What are the main sources of pollution leading to the declaration of your Air Quality Management Area?
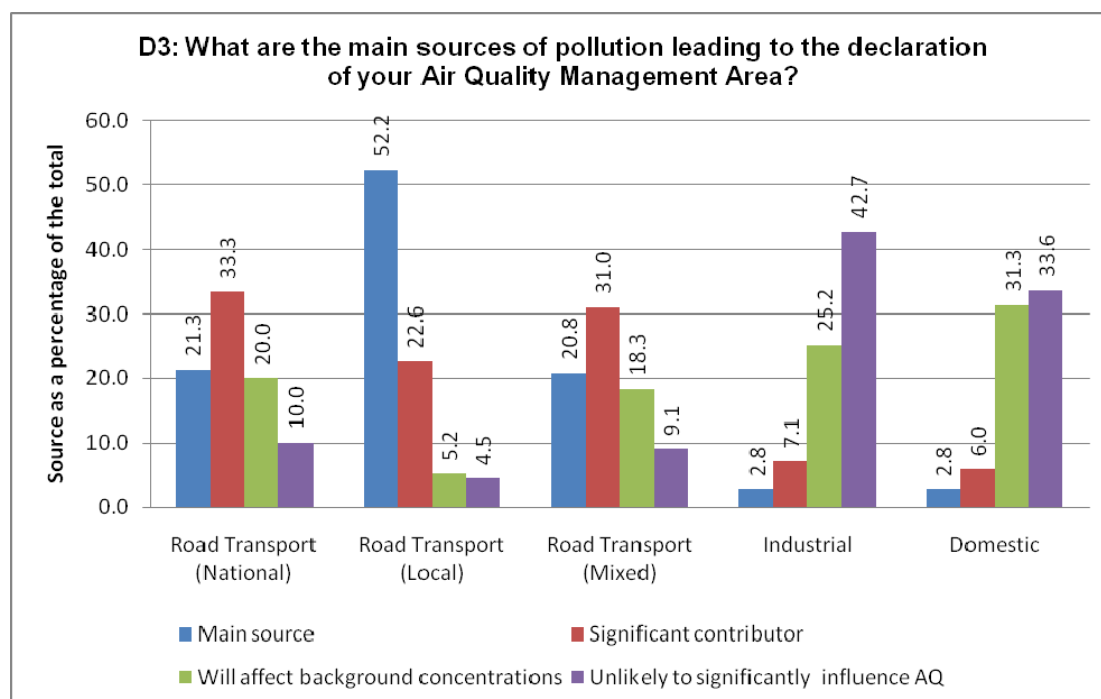
Figure 33: Quantitative response to Question D3 as a percentage of the total

6.3.1 Of the 239 questionnaires received, 133 respondents (55.6%) answered this question (Figure 33). The data presented in Figure 33 reflects the UK perspective with regards to the declaration of Air Quality Management Areas in that the predominant source is road transport (mainly local roads) with industrial and domestic sources either being unlikely to significantly influence air quality or affecting background concentrations.

6.3.2 Other sources identified by respondents included:

- Airports (3 respondents);

- Mixed sources (3 respondents);

- Commercial and/or construction (2 respondents);

- High background concentrations (2 respondents);

- Shipping (2 respondents); and

- Transboundary pollution (1 respondent).

6.3   D4: Has the declaration of an Air Quality Management Area helped your Council in addressing air quality problems?

Figure 34: Response themes from Question D4.

6.3.1   Of the 239 questionnaires received, 120 respondents (50.2%) provided one or more answers to this question. The coded responses have resulted in the emergence of six main themes as outlined in Figure 34.

6.3.2   <u>It has been informative for other agendas and departments (33%):</u>   By declaring an AQMA some respondent found that it had a positive influence on other agendas and departments such as:

- *"got action plan measures higher up the LTP and associated agendas";*

- *"it has lead to strong collaboration between the transport planners and this authority;* and

- *"encourage more environmentally acceptable development".*

6.3.3   <u>It has helped in raising the air quality profile (28%):</u> Respondents stated that the declaration of their AQMA has *"raised awareness….amongst residents, officers, members and other partners", "has widened up inter-departmental communication and awareness"* and *"leads to a more proactive role".*

6.3.4   <u>The AQMA has not been helpful (19%):</u>   Some respondent found that the declaration had not assisted their Council, for example:

- *"the declaration has not meant any more local funding or focus from colleagues within other internal departments";*

- *"[AQMA] is because of a trunk road, nothing the local authority can do, nothing the Highways Agency seem prepared to do at present";* and

- *"it will result in more work, more reports and no practical benefits".*

6.3.5   It has helped in collating information on local air quality (11%):   Many respondents recognised the informative nature of declaring an AQMA in that is helps in identifying the "*types of pollution, the main areas affected and the sources of the problem, allowing focussed action*".

6.3.6   Declaring and AQMA has opened funding opportunities (6%):   The declaration of an AQMA has resulted in some respondents to "*gain access to Defra funding", "allow s106 agreements", "highways have funded research information projects"* and *"helped in retaining internal budgets".*

6.3.7   Declaring an AQMA has allowed for a targeted approach (3%):   Respondents recognised that declaring an AQMA *"has focused the action in relevant areas, without this there could be a tendency for politics to control where improvements are made, with identified exceedences this focuses action in the right places."*

6.4   D5: Have you encountered any difficulties during the declaration of your Air Quality Management Area or subsequently and what actions have been taken, if any, to resolve them?
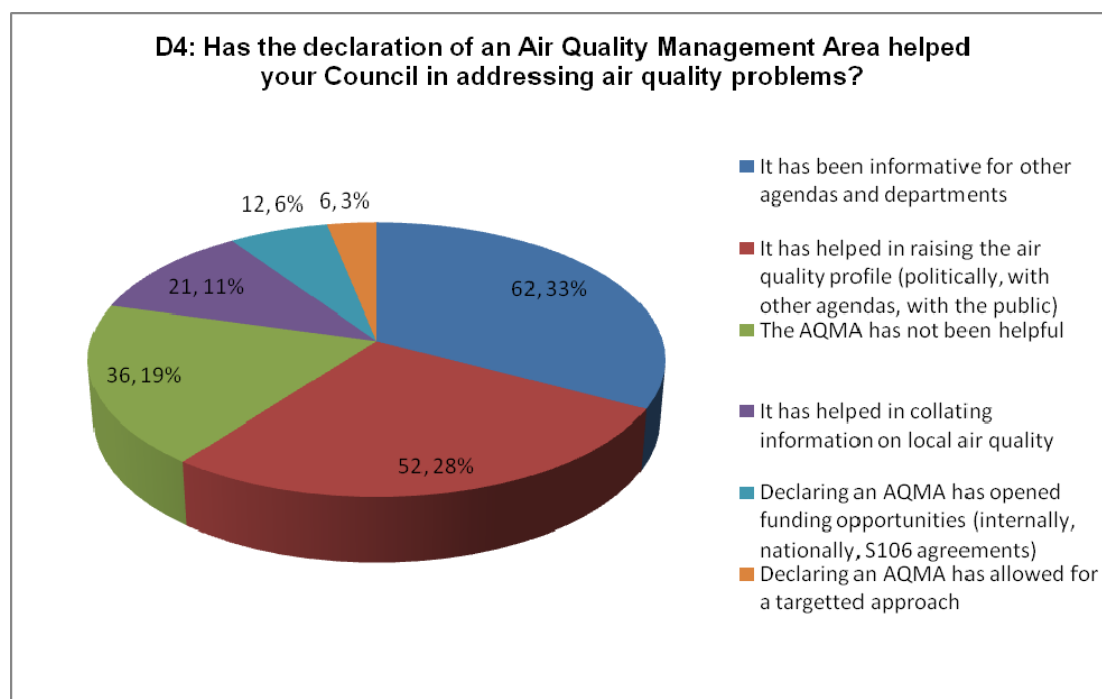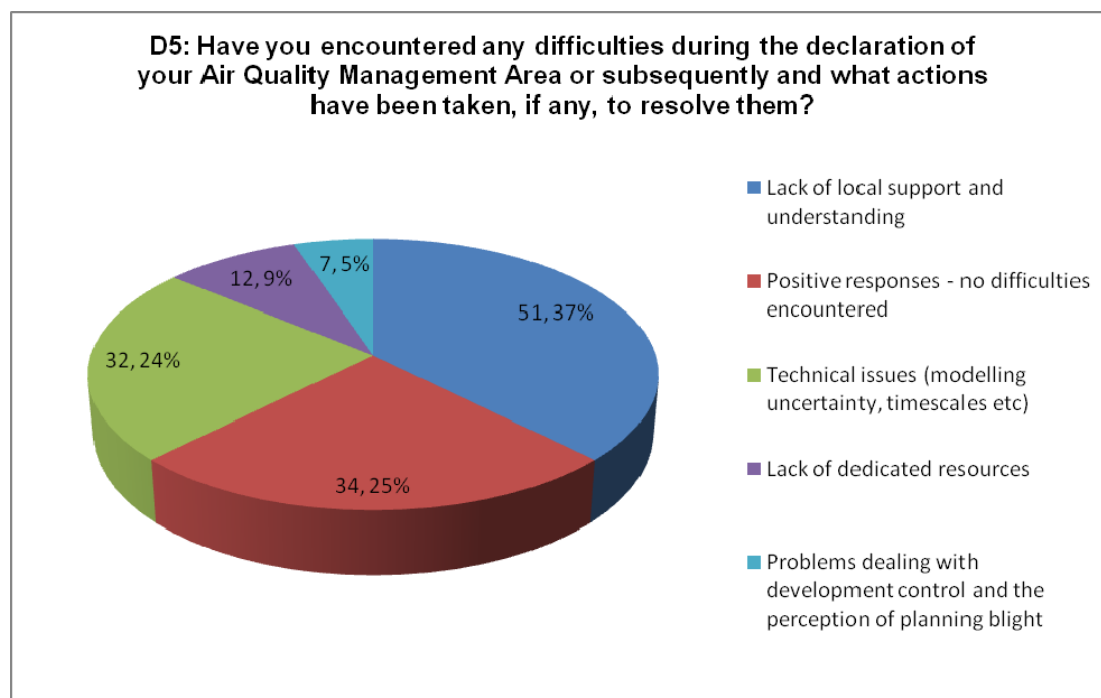

Figure 35: Response themes from Question D5.

6.4.1   Of the 239 questionnaires received, 95 respondents (39.7%) provided one or more answers to this question. The coded responses have resulted in the emergence of five main themes as outlined in Figure 35.

6.4.2   Lack of local support and understanding (37%): Some respondents reported *"difficulties in making decision-makers appreciated air quality is a serious issue"* and the declaration of AQMA can have a *"negative perception with residents and local media resulting in lots of subsequent 'rebuttal' work"*. Some respondents found the process resulted in *"people losing sight of the bigger picture and focus just on the area covered by the AQMA"* while some suggested that other agendas could be *"unsupportive and suspicious of the process"*.

6.4.3   Positive responses – no difficulties encountered (25%): Some respondents found the declaration process to be straight forward.   Some positive comments received include:

- *"we expected political opposition on the basis of blight, but this never happened"*;

- *"stakeholders have generally been supportive";* and

- *"each AQMA declaration has been seen to be a positive step".*

6.4.4   Technical issues (24%): Some respondents found difficulties in dealing with declaration timescales e.g. *"the four month period seems unnecessarily short ……….difficulties getting member approval and statutory consultation time*

within this period". Some respondents reported difficulties with regards to data uncertainties e.g. *"had to re-declare alternative AQMA in light of new data"* and *"the AQMA was declared on the basis of modelling – subsequent monitoring indicated we did not exceed objectives which raised questions about the validity of modelling".*

6.4.5 <u>Lack of dedicated resources (9%):</u> Some respondents again reiterated the lack of resource which can be exacerbated by the declaration process including *"resources required for consultation", "staff resources"* and *"finance for monitoring".*

6.4.6 <u>Problems dealing with development control and the perception of planning blight (5%):</u> Some respondents reported a "*perception that the LAQM process hampers the economic development of a city*" and concerns surrounding the "*potential for blight of areas or properties*".

7 Questionnaire Results: Section E – Air Quality Action Plans

7.   Section E of the questionnaire provided an opportunity for the respondents to comment on the Air Quality Action Planning element of the LAQM process, in particular any difficulties involved in developing a successful action plan and working with people and groups outside of the air quality team. This section of the questionnaire included nine distinct questions and the responses of each question are discussed in detailed below. The following questions were provided:

- E1: Has your Council prepared, or is it in the process of preparing an Air Quality Action Plan?

- E2: How has the development of an Air Quality Action Plan been of use to your Council?

- E3: What have been the main factors that have constrained the development of your Air Quality Action Plan? What actions have been taken, if any, by your Council to resolve them?

- E4: Are there any ways in which the effectiveness of the overall process of Air Quality Action Plan development and implementation could be improved?

- E5: Which department was primarily responsible for drawing up your Air Quality Action Plan?

- E6: Is your Air Quality Action Plan integrated into the LTP? (English Authorities only)

- E7: Has a steering group (or any other group to co-ordinate the work) been established to oversee the Air Quality Action Plan?

- E8 (E8a and E8b): Have other departments, organisations or groups been integral to the Air Quality Action Plan process?

- E9: Do you have any views on the role of Air Quality Action Plan Progress Reports?

7.1   E1: Has your Council prepared, or is it in the process of preparing an Air Quality Action Plan?
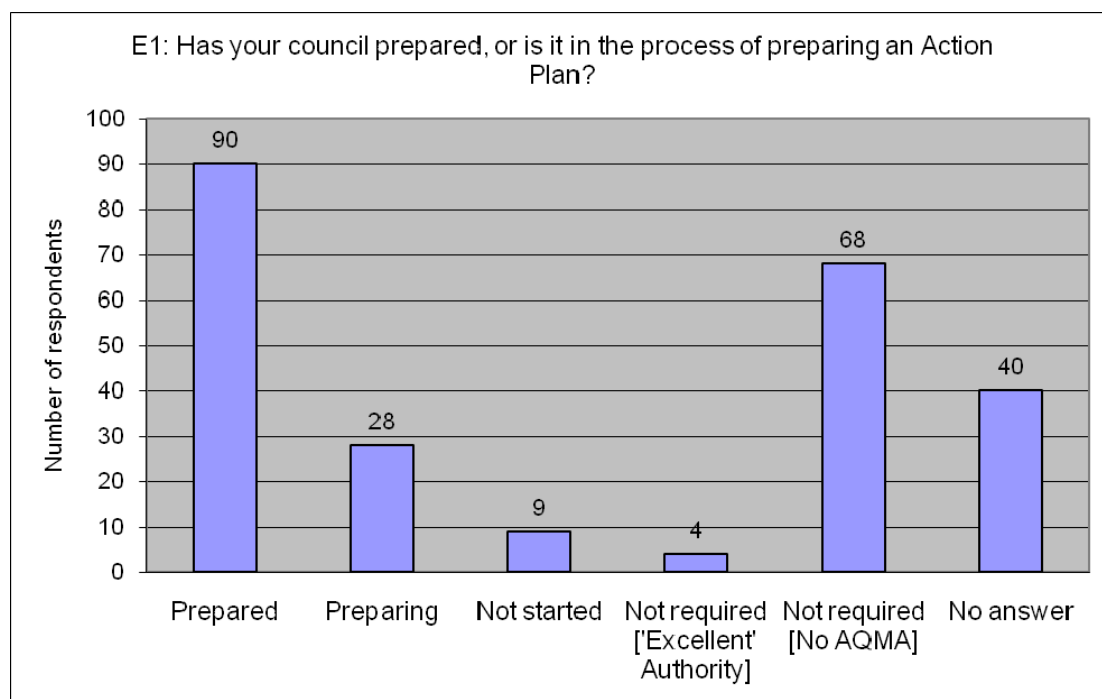
Figure 36: Quantitative response to Question E1.

7.1.1   Of the 239 questionnaires received, 199 respondents (83.3%) provided a response to this question. Of those that responded, 90 respondents (45.2%) had prepared an Air Quality Action Plan with a further 28 respondents (14.1%) in the process of developing one (Figure 36).

7.2   E2: How has the development of an Air Quality Action Plan been of use to your Council?

Figure 37: Response themes from Question E2.

7.2.1   Of the 239 questionnaires received, 117 respondents (49.0%) provided one or more answers to this question. The coded responses have resulted in the emergence of seven main themes as outlined in Figure 37.

7.2.2   <u>Provides focus for the development of mitigating measures (23%):</u> Many respondents recognised the role of AQAP to *"identify direct and indirect actions to improve air quality"*and in doing so "*focussed activity on the most polluted areas"*. AQAPs were identified by some respondents as mechanisms which "*act as a catalyst to promote*" measures in improve local air quality.

7.2.3   <u>Facilitation of partnership working (23%):</u> Respondents recognised that the AQAP development process *"improved partnership working with other relevant statutory authorities"* and in doing so has ensured that *"air quality is gradually being integrated into wider policies*".

7.2.4   <u>Raising the profile of air quality (20%):</u> As previously illustrated in the declaration of AQMAs (Section 6.3), there is a perception among respondents that developing an AQAP has *"raised the profile of air quality issues with partner agencies and stakeholders".*

7.2.5   <u>Negative responses (16%):</u> Some respondent highlighted difficulties that they had encountered in the AQAP development and subsequent implementation, some examples included:

- *"unable to implement the key actions in the plan due to a lack of funding, this undermined the credibility of the plan";*

- *"somewhat limited due to the industrial source and our limited powers";*

- *"I'm not sure that it [AQAP] has, other than to demonstrate how little the local authority is actually able to achieve"*

- *"has felt like a paper exercise, very difficult to get stakeholders involved";* and

- *"no use at all, County Council highways have included its [AQAP] findings in their LTP and ignored it for the last 4 years".*

7.2.6   <u>Influence local transport planning (8%):</u>   The majority of respondents who highlighted the influence that the AQAP can have on local transport were though *"linkages with the Local Transport Planning process"* in England (See Section 7.6 for more on LTP).

7.2.7   <u>Tool to secure resources (6%):</u>   Some respondents identified that the development of the AQAP has *"helped with budgeting"* and also assisted Councils to secure funding *"via s106 agreements"* and forming the basis of *"successful Air Quality Grant applications"*.   In obtaining these financial contributions, Council have been able to *"keep some resources dedicated to air quality"*.

7.2.8   <u>Influence land-use planning (4%):</u>   Some respondents found the engagement of land-use colleagues in the development of the AQAP had been helpful in generating *"stronger links between spatial planning and environmental protection functions"* and had the potential to *"trigger a planning system for development control purposes"*.

7.3   **E3: What have been the main factors that have constrained the development of your Air Quality Action Plan? What actions have been taken, if any, by your Council to resolve them?**
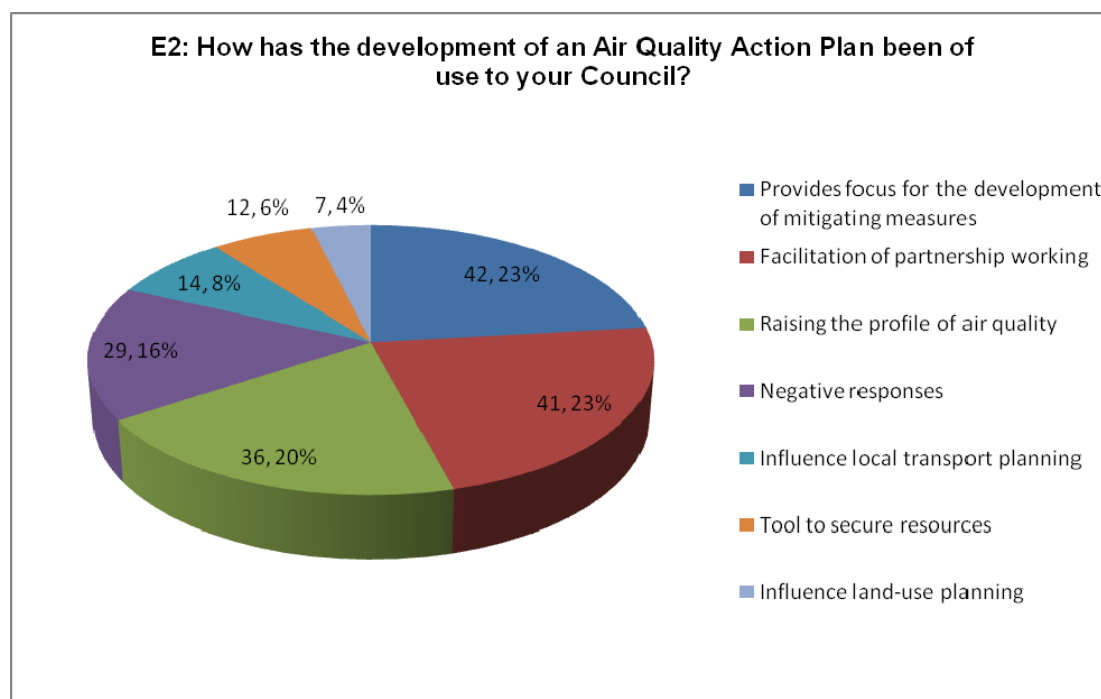

Figure 38: Response themes from Question E3.

7.3.1   Of the 239 questionnaires received, 115 respondents (48.1%) provided one or more answers to this question.   The coded responses have resulted in the emergence of five main themes as outlined in Figure 38. Many respondents identified constraining factors to the development of their AQAP but few provided information on the steps taken to resolve these issues.

7.3.2   Difficulties in engaging others and dealing with conflicting policies (31%): Many respondents reported a difficulty in engaging other departments in the AQAP development phase resulting in a *"lack of corporate ownership"*. Establishing steering groups with representative from other departments was seen as a positive step towards resolving the issue.

7.3.3   Lack of resources (31%):   Various elements of resource constraints were identified by respondents. Potential solutions included applying for funding through other policies e.g. LTP and applying for central funding with varied success. Resource constraints include:

- *"staffing resources";*

- *"lack of funding for its implementation that makes the process seem a little futile";*

- *"time to develop it [AQAP], given our already high workload";* and

- *"we have a plethora of intended actions that need relatively modest sums of money to get off the ground".*

7.3.4 <u>Inability to implement actions (19%):</u> A common theme among respondents was the lack of *"regulatory control over main emitters"* and therefore respondent feel that there is "*not enough power within our departments to make the big decisions to influence air quality*" and this can have the effect of *"an AQAP based on 'softer'/educative interventions"*. A suggested solution is the establishment of steering groups to promote *"greater cooperation and communication between departments"*.

7.3.5 <u>Little support from national organisations (10%):</u> Some respondents complained of a perceived limited interest, understanding and support from national organisations such as the Highways Agency and suggested that there was a need for *"government lead"* in resolving this issue.

7.3.6 <u>Miscellaneous (9%):</u> Some miscellaneous constraints reported by respondents include:

- *"these plans very quickly become out of date";*

- *"little or no quantification of impacts";* and

- *"reluctance to introduce an AQAP based on modelling".*

7.4   E4: Are there any ways in which the effectiveness of the overall process of Air Quality Action Plan development and implementation could be improved?
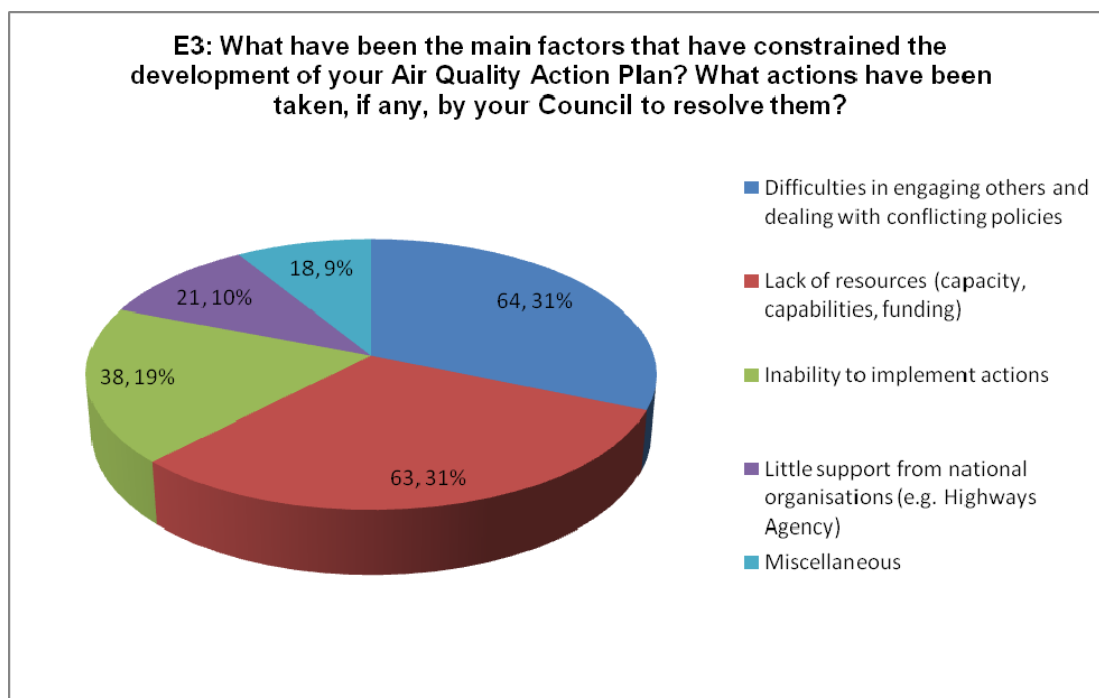

Figure 39: Response themes from Question E4.

7.4.1   Of the 239 questionnaires received, 88 respondents (36.8%) provided one or more answers to this question. The coded responses have resulted in the emergence of six main themes as outlined in Figure 39.

7.4.2   <u>More national support and direction (45%):</u> The majority of respondents identified the need for more national direction and support. Specific themes included:

- *"legislation/guidance and financial support to require transport actions";*

- *"if the implementation of the AQAP was mandatory, funding would be easier to obtain within the Council";*

- *"tools for quantification so we can prioritise actions easier"; "case studies with quantification"*

- *"Defra/DAs to engage with Transport and Planning Departments at a higher level";* and

- *"clearer links with climate change ".*

7.4.3   <u>More onus on other agendas to engage with the process (22%):</u> Other respondents suggested that there was a need for *"greater demand/onus on non-environmental health services to take an active role"* not just in assisting with the development of the AQAP but also its implementation.

7.4.4 <u>Improving relationships and communication with others (13%)</u>: Some respondent suggested that ensuring air quality is *"integrated as a core policy for all agendas from the top down"* would be a pro-active step towards improving relationships and communication with other agendas.

7.4.5 <u>Improvements in the provisions of dedicated resources (9%)</u>: Reflecting the lack of resources theme identified in Section 7.3, respondent called for improvements in the provision of dedicated resources including "*grants for individual actions", "greater Council staff time resources",* and *"funding for good sustainable transport infrastructure and national policy support to disincentives travel".*

7.4.6 <u>Miscellaneous (5%)</u>: Some respondents were unable to identify any improvements that could be undertaken while other respondents had identified improvements specific to their local situations that they could implement such as *"producing a single air quality strategy/action plan to identify action for the whole borough not just areas of poor air quality".*

7.4.7 <u>Specific actions (6%)</u>: Some respondents provided specific actions which they identified as being beneficial to the development and implementations of AQAPs, these include:

- *"statutory requirement for the implementation of low emission strategies";*

- *"acceleration of Euro VI uptake";*

- *"re-regulate bus services";* and

- *"combine air quality and climate change plans".*

7.5   E5: Which department was primarily responsible for drawing up your Air Quality Action Plan?

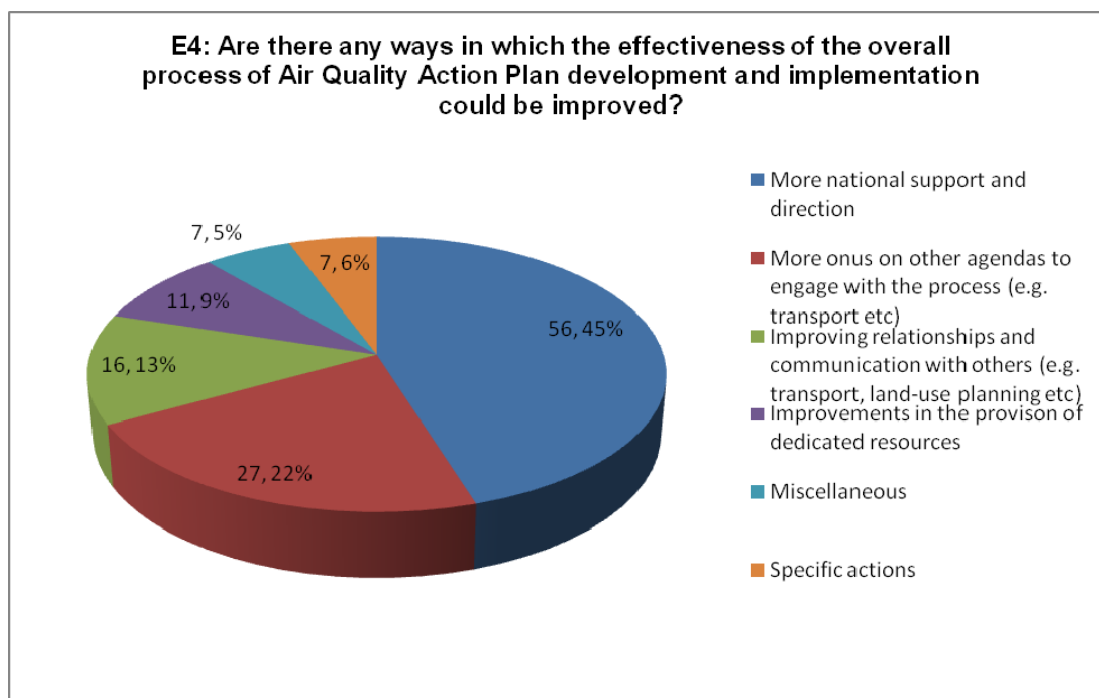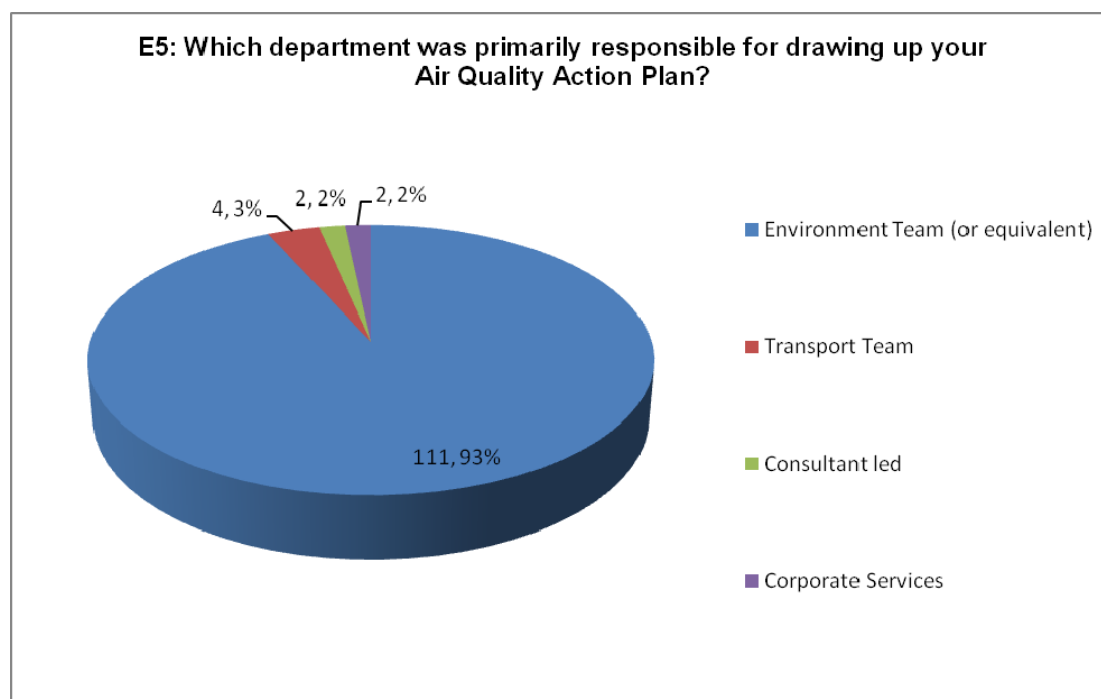**Figure 40: Response themes from Question E5.**

7.5.1   Of the 239 questionnaires received, 120 respondents (50.2%) provided a response to this question. Predominantly, the Council's Environment Team (or equivalent) was responsible for drawing up the Air Quality Action Plan.

7.5.2   Many of the respondents stated that keeping responsibility for the development of an Air Quality Action Plan within the Environmental Health (or equivalent) department would result in "*maintaining air quality as a priority*" however some respondents stated that the Air Quality Action Plan development process would benefit from *"greater input"* from other departments or agendas particularly those with powers to implement actions on the sources of pollution.

7.6 E6: Is your Air Quality Action Plan integrated into the LTP? (English Authorities only)
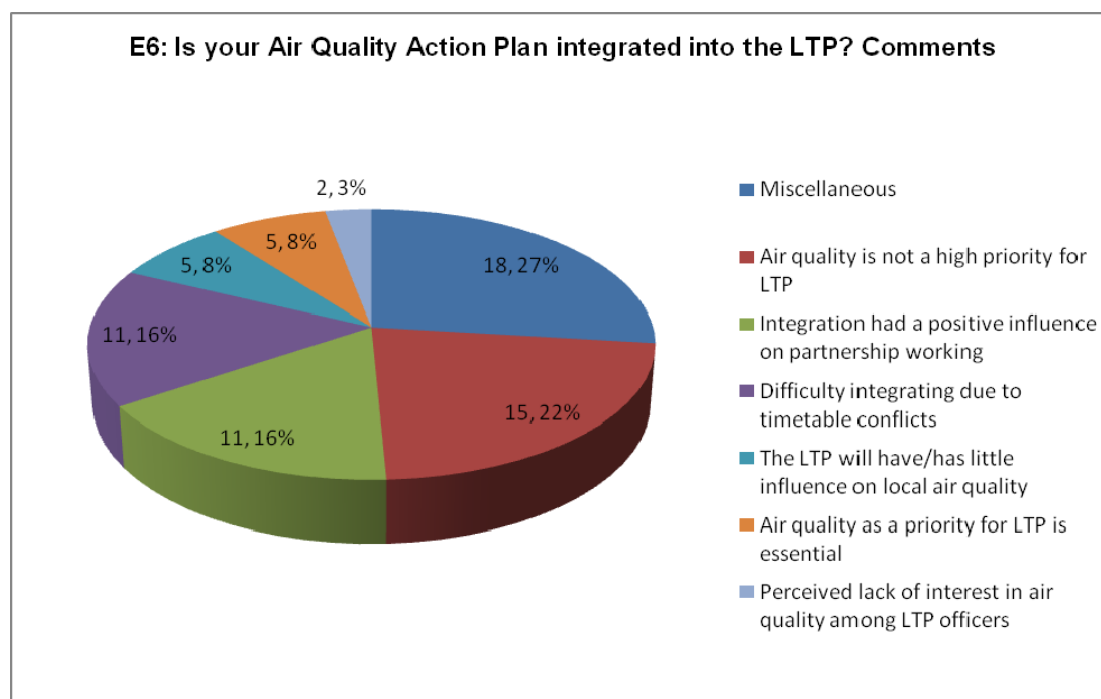
Figure 41: Response themes from Question E6.

7.6.1 Of the 176 English questionnaires received, 87 respondents (49.4%) answered the quantitative element of the question. Of those responses, 55 respondents (63.2%) indicated 'Yes, their AQAP was integrated into the LTP' and 32 respondents (36.8%) stated 'No, their AQAP was not integrated into the LTP'.

7.6.2 Of the 239 questionnaires received, 75 respondents (31.4%) provided additional commentary to this question (including some non-English respondents). The coded responses have resulted in the emergence of seven themes as outlined in Figure 41.

7.6.3 Miscellaneous (27%): Some miscellaneous comments highlight how some AQAPs had not been integrated into the LTP process and some AQAPs were not relevant to LTP.

7.6.4 Air quality is not a high priority for LTP (22%): Some respondents recognised that *"even though air quality was one of the four 'shared priorities' it was clear that it was the lowest priority"*

7.6.5 Integration has a positive influence on partnership working (16%): Reiterating the point made in Section 7.2, respondents stated that the integration of air quality into LTP has *"encouraged dialogue between the LTP team and environmental health".*

7.6.6 Difficulty integrating due to timetable conflicts (16%): Some respondents highlighted a timetabling conflict resulting in their AQAP not being included in LTP2. Other respondents mentioned the difficulty in trying to integrate new AQMAs and new AQAPs into the LTP process once the LTP2 was published

suggesting *"integration would have been better if the timescales for both had been aligned".*

7.6.7 <u>The LTP will have/has little influence on local air quality (8%):</u> Some respondents were despondent about the actual influence LTP was having on local air quality stating *"LTP seems to just want to tick boxes"* and the integration of air quality into the LTP process "*does not give any more power or give the County Council any more ownership of it".*

7.6.8 <u>Air quality as a priority for LTP is essential (8%):</u> Some respondents (including some non-English respondents) stated that *"air quality management and LTP should be integrated"* and "*this should be a priority for LTP3".*

7.6.9 <u>Perceived lack of interest in air quality among LTP officers (3%):</u> Two respondents identified a perceived lack of interest among transport colleagues calling for *"continuing education of Highways Engineers and Transportation Planners of the importance of air quality".*

7.7 E7: Has a steering group (or any other group to co-ordinate the work) been established to oversee the Air Quality Action Plan?

7.7.1 Of the 119 respondents that answered this question 52.9% had established a steering group to oversee the Air Quality Action Plan while 47.1% had not.

7.7.2 When the responses were analysed by region it was interesting to note that 100% of Scottish respondents had established a steering group to oversee the action plan but over three-quarters of the London respondents had not established a steering group. No explanation was provided in the questionnaire data for this. The other regions exhibited an approximate 50:50 spilt between those that had, and those that had not, established a steering group.

7.8 E8 (E8a and E8b): Have other departments, organisations or groups been integral to the Air Quality Action Plan process? Please comment on their involvement

7.8.1 Of the 239 questionnaires received, 92 respondents (38.5%) provided information on the departments involved in Question E8(a). However, the open and amorphous nature of this question has resulted in difficulties in undertaking detailed analysis due to the fragmented, varied and very locally specific nature of the responses. The majority of respondents stated that they had engaged with transport colleagues (either within their local authority, within their County Council or with the relevant Highways Authority as appropriate to their local situation) as part of the AQAP steering group (this is to be expected as the majority of AQMAs in the UK are transport related). Other departments and groups which were regularly highlighted as members of the steering group by respondents include:

- Planning departments;

- Housing Executive;

- Regeneration Teams;

- Local Councillors;

- Climate Changes / Sustainability Teams;

- Council Fleet Management;

- Local Health Authority;

- Local Residents / Pressure Groups / NGOs

- Travel wise teams;

- Environment Agency;

- Neighbouring authorities; and

- Local Freight Management Groups.

7.8.2 Some respondents had positive feedback on the level of engagement of transport colleagues but reported difficulties in engaging the correct person e.g. *"involvement tends to be senior local engineers rather than transport planners which causes some difficulties".* Other respondents stated substantial difficulties in engaging any colleagues e.g. *"no one interested - all have their own pressures and priorities"*. One respondent stated that "*there have been various working groups but maintaining these groups is difficult, having such wide ranging departments attending meetings regularly in which their involvement is only one part is difficult".*

7.8.3 Of the 239 questionnaires received, 25 respondents (10.5%) provided commentary on the departments not involved in Question E8(b). Respondents identified various barriers for successful integration of other departments / organisations / groups into the AQAP steering group including:

- not engaging with the various departments early enough in the process;

- the LAQM process is not consider a priority of other departments, they viewed their engagement as *"time-consuming"*;

- lack of "*staff resources*" in all departments; and

- a suggestion that there should be a "*transfer of responsibility"* for writing the AQAP to those that "*are able to directly affect it [air quality] as opposed to those who lobby and influence"*

7.9 E9: Do you have any views on the role of Air Quality Action Plan Progress Reports?
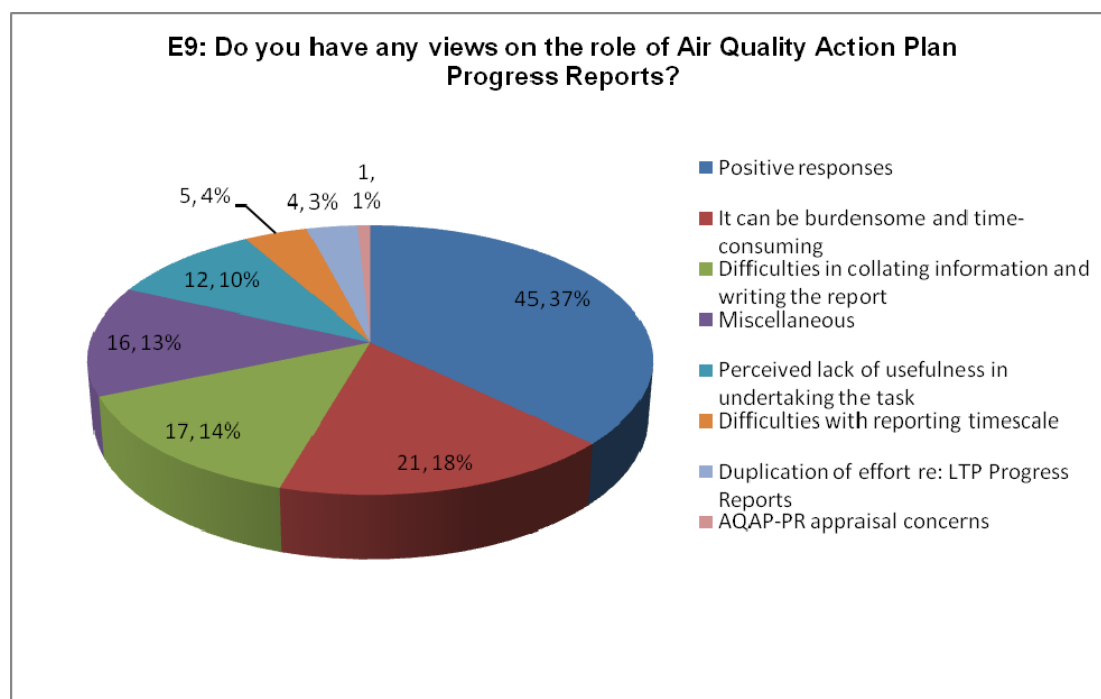
Figure 42: Response themes from Question E9.

7.9.1 Of the 239 questionnaires received, 84 respondents (35.1%) provided one or more responses to this question. The coded responses have resulted in the emergence of five main themes as outlined in Figure 42.

7.9.2 Positive responses (37%): Many respondents recognised the usefulness of AQAP Progress Reports as they *"provide continuity"* and "*keep the issue on the agenda of Council departments".*

7.9.3 It can be burdensome and time-consuming (18%): Respondents stated that they found the AQAP Progress Report to be *"necessary to ensure continued implementation of the AQAP but onerous"* and suggested that they *"take up a lot of resources, interfere with other work demands and achieve very little"*.

7.9.4 Difficulties in collating and writing the report (14%): Respondents reported numerous issues that impact on the collation of data and writing of the AQAP Progress Report, these include:

- *"heavy reliance on external bodies [for information]";*

- *"very difficult to measure the impacts of most actions";* and

- *"actions can take a long time to come to fruition";*

7.9.5 Miscellaneous (13%): Some respondents had no experience of undertaking this duty yet other highlighted the issue of updating the AQAP stating *"not clear at what stage an AQAP should be revised, maybe a default of every 5 years to ensure remains up to date"* and another respondent suggested that the AQAP should be a *"living document"*.

7.9.6   <u>Perceived lack of usefulness in undertaking this task (10%)</u>:   Some respondents suggested that AQAP Progress Reports were *"varied in their usefulness – seen as a box ticking exercise by some"*

7.9.7   <u>Difficulties with report timescale (4%)</u>:   Some respondents found the frequency of AQAP Progress Reports to be an issue stating *"progress is usually long-term and there is not much to say year on year, perhaps this should be every two years".*

7.9.8   <u>Duplication in effort re LTP Progress Reports (4%)</u>:   There was some confusion among respondents upon the perception of "*duplicating work as there is also a LTP Progress Report"* and suggestions that "*where the AQAP is integrated into LTP2, there should not be a requirement to do a full report, as this would just duplicate the LTP2 Progress Report".*

7.9.9   <u>AQAP Progress Report appraisal concerns (1%)</u>: One respondent stated that *"there appears to be no critical review of this by an appraisal team i.e. no incentive to try harder".*

8 Questionnaire Results: Section F – Air Quality and Other Policies

8. Section F of the questionnaire provided an opportunity for the respondents to comment on the relationship of air quality with other policies, primarily considering transport planning and land-use planning, and also considering the interactions with the health and climate change agendas. This section of the questionnaire included ten distinct questions and the responses of each question are discussed in detailed below. The following questions were provided:

- F1: Does your Council have a Local Air Quality Strategy?

- F2 (a and b): If you have a Local Air Quality Strategy, has it assisted you Council?

- F3: Are you consulted adequately on schemes that might have an effect (positive or negative) on air quality?

- F4: What steps could be taken to improve inter-departmental relationships relating to air quality within your Council or with other bodies?

- F5: have you ever sought support from the relevant highways authority in undertaking your LAQM duties?

- F6: Does your Council have a Supplementary Planning Document/Guidance/Note (or equivalent) on air quality for development control?

- F7: What actions has your Council taken to raise awareness of the link between air quality and health with the public or local health bodies?

- F8: What recommendations would you make for further action in promoting links between air quality and health policies/activities at a local and/or national level?

- F9: Can you suggest ways in which links between climate change and air quality responsibilities could be made more efficient and/or effective within your Council/other responsible bodies?

- F10: Are there any other comments you would like to make regarding the LAQM process that haven't been address by the questions in this survey.

8.1 F1: Does your Council have a Local Air Quality Strategy (LAQS)?
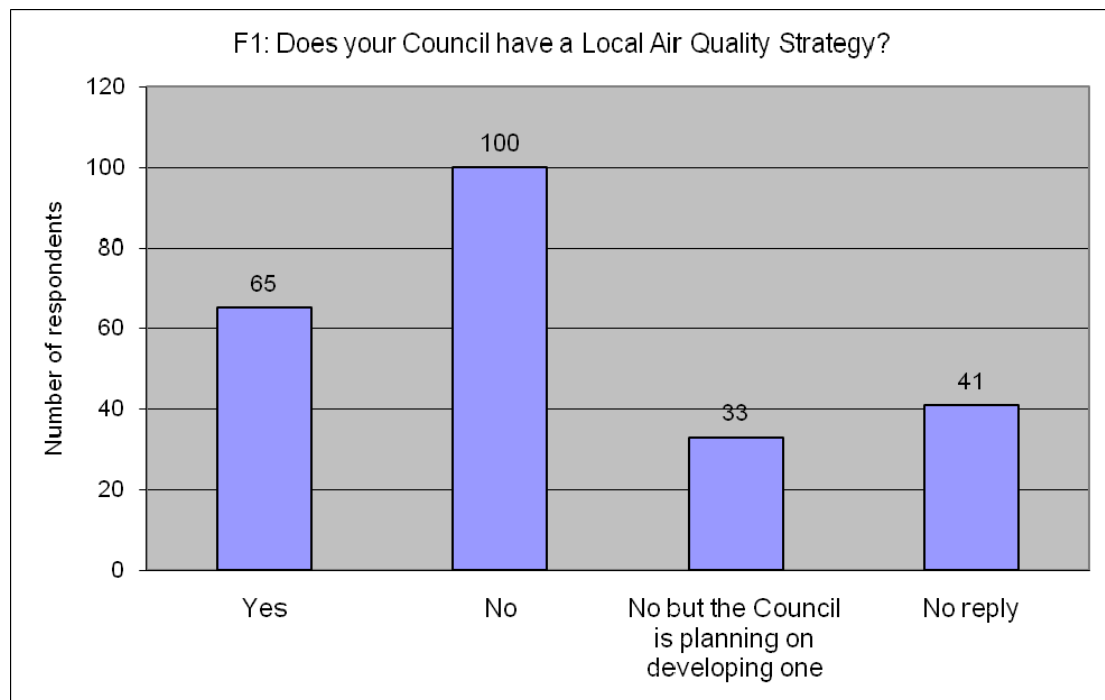
Figure 43: Quantitative response to Question F1.

8.1.1 Of the 239 questionnaires received, 198 respondents (82.8%) provided a quantitative response to this question. Only 65 respondents had a Local Air Quality Strategy (32.8%) with a further 33 respondents (16.7%) currently in the process of developing one (Figure 43). The coded responses have resulted in the emergence of six main themes as outlined in Figure 44.
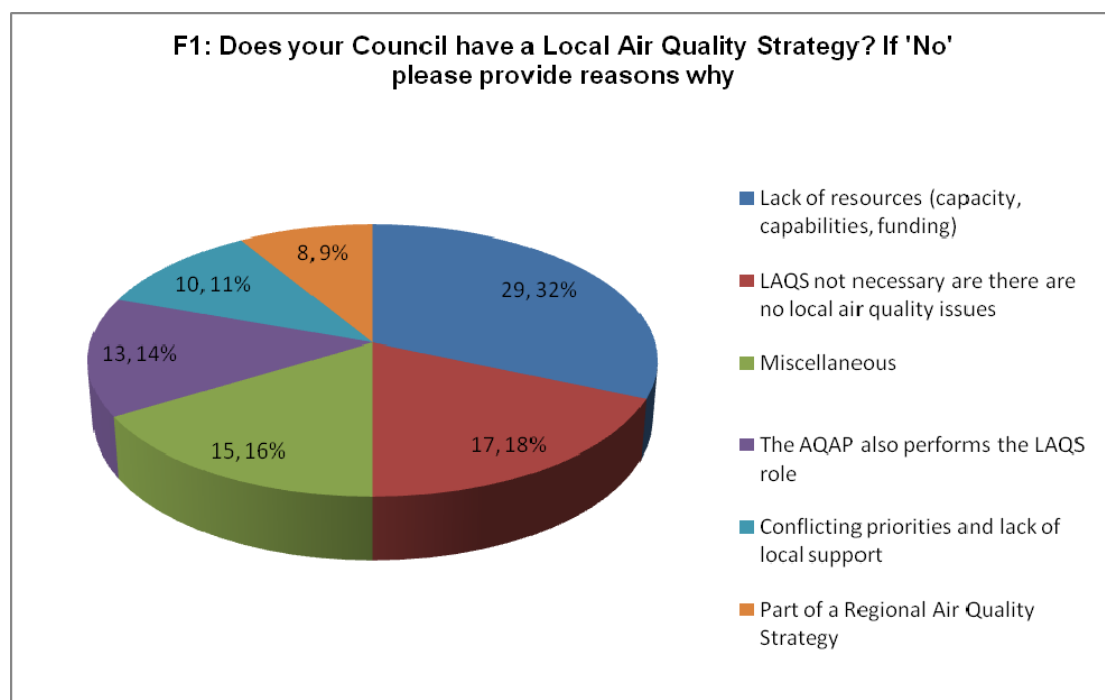
Figure 44: Response themes from Question F1.

8.1.2   <u>Lack of resources (32%):</u> The regular theme of a lack of resources again was of primary concern to respondents, explaining why they had not developed a LAQS. Mostly it was "*time and human resource constraints*" that impacted respondent's ability to either write a LAQS or update an existing LAQS.

8.1.3   <u>LAQS not necessary as there are no air quality issues (18%):</u> Some respondents stated "*air quality is not a significant issue and so development of a strategy is not a priority*".

8.1.4   <u>Miscellaneous (16%):</u> Some respondents stated that they were in the process of developing a LAQS or that other functions that they perform would duplicate a LAQS. One respondent (who did not have a LAQS) stated that they would not be developing a LAQS but *"would consider a combined air quality and climate change strategy"*.

8.1.5   <u>The AQAP also performs the LAQS role (14%):</u> Some respondents considered that their AQAP replicates the *"role of a strategy"*.

8.1.6   <u>Conflicting priorities and lack of local support (11%):</u> Some respondents highlighted difficulties with conflicting priorities and while they *"recognise that this could be beneficial but it would require corporate support to take it forward"*.

8.1.7   <u>Part of a regional strategy (9%):</u> Some respondents had not developed a local air quality strategy as they were already part of a regional air quality strategy group.

8.2 F2(a): If you have a Local Air Quality Strategy, has it assisted you Council? F2(b): Please describe ways in which your Local Air Quality Strategy has been helpful or not helpful?
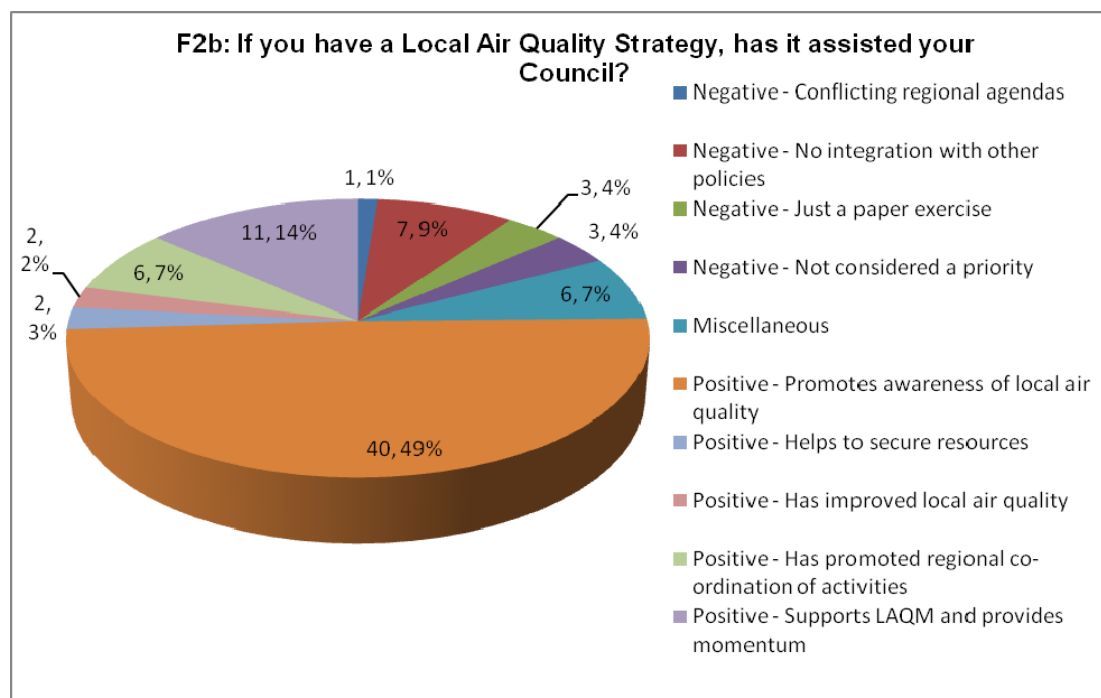
Figure 45: Response themes from Question F2.

8.2.1 Of the respondents that answered Part (a) of this question, 73.3% stated that 'Yes, the Local Air Quality Strategy had assisted their Council', while 26.7% stated 'No, the Local Air Quality Strategy had not assisted their Council'.

8.2.2 Of the 239 questionnaires received, 55 respondents (23.0%) provided one or more responses to Part (b) of this question. The coded responses have resulted in the emergence of numerous themes as outlined in Figure 45.

8.2.3 Five positive themes have been identified, these are:

- Promotes awareness of local air quality (49%): The majority of respondents recognised the role of the LAQS as a tool to provide a *"summary of information for elected members, public etc with regards to Council policy on air quality"* and "*provide focus*".

- Supports LAQM and provides momentum (14%): Many respondents recognised that having a LAQS has helped by "*underpinning the overall LAQM philosophy/practice"* while *"getting us started on the improvement to air quality".*

- Has promoted regional co-ordination of activities (7%): Respondents with regional air quality strategies highlighted the promotion of *"joined up thinking between local authorities"* allowing for the utilisation of *"combined resources".*

- Helps to secure resources (3%): Two respondents thought that a LAQS has helped to secure resources to assist with their LAQM duties.

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- Has improved local air quality (3%): Two respondents thought that a LAQS has helped to improve local air quality and helped with the identification of pollution sources.

8.2.4   Four negative themes have been identified, these are:

- No integration with other policies (9%): The largest negative perception of the LAQS is the lack of engagement and "*buy-in*" by other agendas including transport and land-use planning.

- Not considered a priority (4%): Some respondents thought that there was no *"political will"* to have a LAQS and it was not consider a priority to either develop a new LAQS or update an existing dated LAQS.

- Just a paper exercise (3%): Some respondents thought that a LAQS has *"no meaning"* and *"just a paper exercise"*.

- Conflicting regional agendas (1%): One respondent as part of a regional air quality strategy highlighted *"difficulties in co-ordinating a regional strategy where there are competing interests in neighbouring authorities"*.

8.3 F3: Are you consulted adequately on schemes that might have an effect (positive or negative) on air quality?
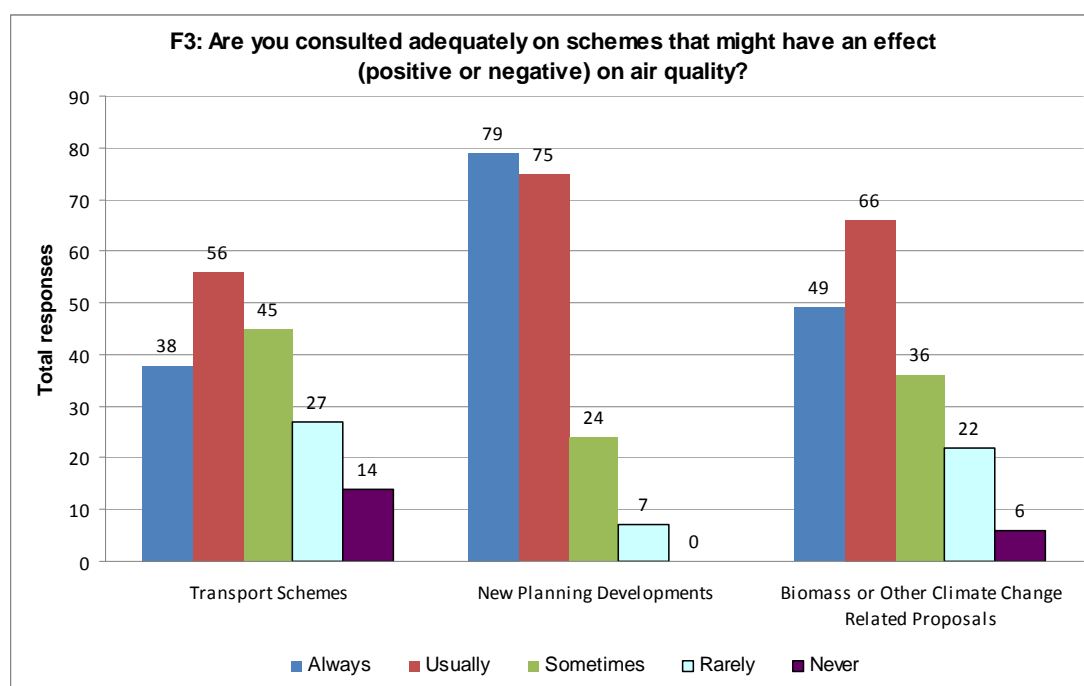
Figure 46: Quantitative responses from Question F3.

6.3.1 Of the 239 questionnaires received, 185 respondents (77.4%) answered one or more elements of this question (Figure 33). As illustrated in Figure 46, the majority of respondents stated that they are 'Always' or 'Usually' consulted on new planning developments but for transport schemes and biomass or other climate change related proposals there was more uncertainty on the level of consultation undertaken with a larger proportion of 'Sometimes', 'Rarely' and 'Never' responses.

6.3.2 Other sources consulted upon include (unless stated, no feedback was provided upon the level of consultation):

- Environment Agency/SEPA processes (one respondent stated that the consultation from SEPA was poor, one respondent stated that the Environment Agency always consulted);

- Fugitive Sources;

- PPC; and

- Shipping.

8.4   F4: What steps could be taken to improve inter-departmental relationships relating to air quality within your Council or with other bodies?
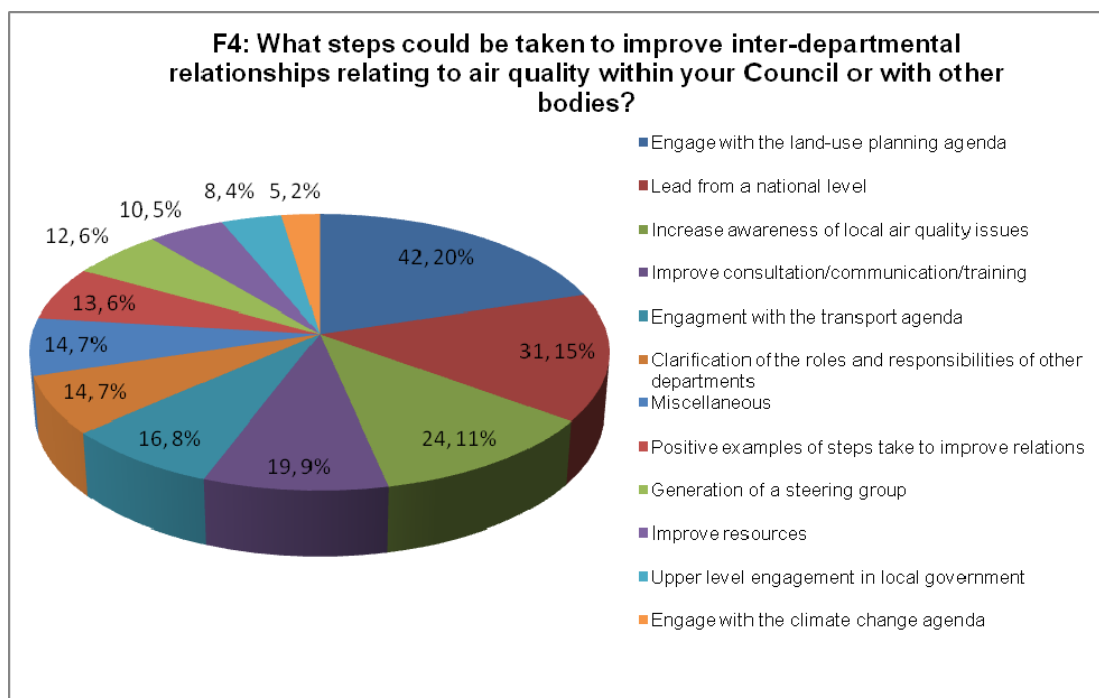
Figure 47: Response themes from Question F4.

8.4.1   Of the 239 questionnaires received, 131 respondents (54.8%) provided one or more responses to this question. The coded responses have resulted in the emergence of numerous themes as outlined in Figure 47.

8.4.2   Engage with the land-use planning agenda (20%):   Many respondents identified engagement with the land-use planning agenda as a main priority including options such as:

- *"requirement to have a [air quality] policy in LDF", "improvements in air quality should be a mandatory consideration in City Region and Local Development Plans";*

- *"provide more robust planning requirements to incorporate air quality in planning process";*

- *"requirement for Supplementary Planning Documents/ Guidance";* and

- *"encourage the use of s106 type agreements to secure monitoring/actions";*

8.4.3   Lead from a national level (15%): Some respondents stated that relationships could be improved by *"nationally driven increased awareness and importance campaign of air quality"* perhaps providing a *"more legal requirement for them [other departments] to commit to air quality".*

8.4.4   Increase awareness of local air quality activities (11%): Some respondents identified the role they can play in raising awareness, recognising that *"people*

tend to work in silos only concerned with their area of work and this needs to change if a concerted effort is to be made" and that they need to *"look at ways in which we can work together".*

8.4.5 <u>Improve consultation/communication/training (9%):</u> Many respondents recognised the role that improved consultation, additional communication and training can have for improving relationships. However, many stated that the consultation and communication need to be *"two-way"* and the training provided should be *"awareness training across air quality officers, transport planners and planners so they are familiar with each other's issues and priorities".*

8.4.6 <u>Engagement with the transport agenda (8%):</u> Some respondents gave suggestions as to how air quality can be integrated into the transport agenda more effectively including:

- *"air quality staff are embedded, or actually within the transport planning or transport studies team";*

- *"Director of Transport to be given performance related targets for air quality";* and

- *"more national guidance aimed at transport planners".*

8.4.7 <u>Clarification of the roles and responsibilities of other departments (7%):</u> Some respondents called for clarification of *"departmental responsibilities"* suggesting that there should be *"statutory duties for other departments".*

8.4.8 <u>Miscellaneous (7%):</u> Some ad-hoc and frustrated responses were received, including:

- *"we just sold off the planners to Capita – you tell me how to engage them!!";*

- *"more Environment Agency involvement in LAQM";* and

- *"assess during CAA whether local authorities have such links established and require proof of progress and targets achieved".*

8.4.9 <u>Positive example of steps taken to improve relations (6%):</u> Some respondents provided some local examples of positive steps they had taken to improve relationships with other departments. Some examples included:

- "*relevant persons from different units sit on working groups relevant to their area of work"; and*

- *"much more cooperation was achieved when air quality was targeted as one of the key issues for the LTP2";*

8.4.10 <u>Generation of a steering group (6%):</u> Some respondents stated that the relationships with other departments had improved by the "*establishment of a local steering group".*

8.4.11 <u>Improve resources (5%):</u> A few respondents suggested that *"additional staff resources would provide additional commitment to developing interdepartmental relationships".*

8.4.12 <u>Upper level engagement in local government (4%):</u> Some respondents highlighted concerns with the engagement of upper-level local government officers with air quality stating "*there are good inter-departmental relationships, but air quality is not taken seriously/not a priority by those higher up the sections which in turn filters down to staff".*

8.4.13 <u>Engage with the climate change agenda (2%):</u> A few respondents recognised the co-beneficial advantages of engaging with the climate change agenda suggesting the *"integration of the air quality and climate change issues would force a wider, more joined up strategic approach".*

8.5   F5: have you ever sought support from the relevant highways authority in undertaking your LAQM duties?

Figure 48: Response themes from Question F5.

8.5.1   Of the 239 questionnaires received, 168 respondents (70.3%) provided a quantitative response to this question. The majority, 142 respondents, stated that they had sought support from a relevant highways authority (84.5%). The coded responses upon the "level of support received" have resulted in the emergence of five themes as outlined in Figure 48.

8.5.2   Obtaining data from LAQM (40%): A substantial number of respondents contacted their relevant highways authority to obtain data to assist in undertaking their LAQM duties specifically *"traffic data"* and other data *"to support the preparation of USA reports etc"*. Of those respondents that commented on the level of support received with obtaining traffic data, 12% of respondents stated the support was "poor", 48% of respondents stated the support was "adequate" while 40% of respondents stated the support was "good".

8.5.3   AQAP development and implementation (28%): Some respondents stated that they sought support from the relevant highways authority for the development and implementation of their action plan. Of those respondents that commented on the level of support received, 34.5% of respondents stated the support was "poor", 44.8% of respondents stated the support was "adequate" while 20.7% of respondents stated the support was "good".

8.5.4   Good support received (15%): Some respondents stated that the support they received was good, for example:

- "*County Council very thorough in their support";*

- *"they have been involved at the consultation stage and have provided valuable support and information";* and

- *"the highways team has been part of the working group considering air quality since its inception".*

8.5.5 <u>Very difficult to engage (13%):</u> Some respondents stated the support they received was poor, for example:

- *"very difficult to engage with Highways Agency, they introduce plans to tackle AQMA and don't inform us";*

- *"Highways Agency are remote and difficult to deal with";* and

- *"TfL……absolutely no support, unhelpful and support decisions which conflict with air quality "*

8.5.6 <u>Miscellaneous (4%):</u> Some respondents included some fragmented comments which could not be easily categorised.

8.6   F6:   Does   your   Council   have   a   Supplementary   Planning Document/Guidance/Note (or equivalent) on air quality for development control?

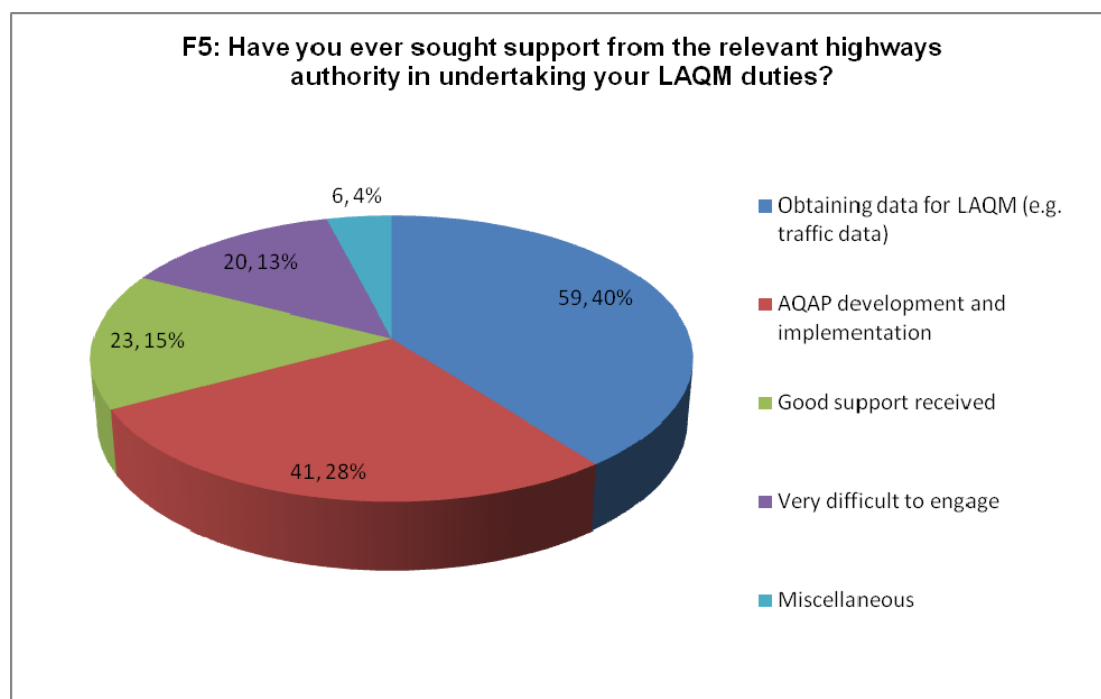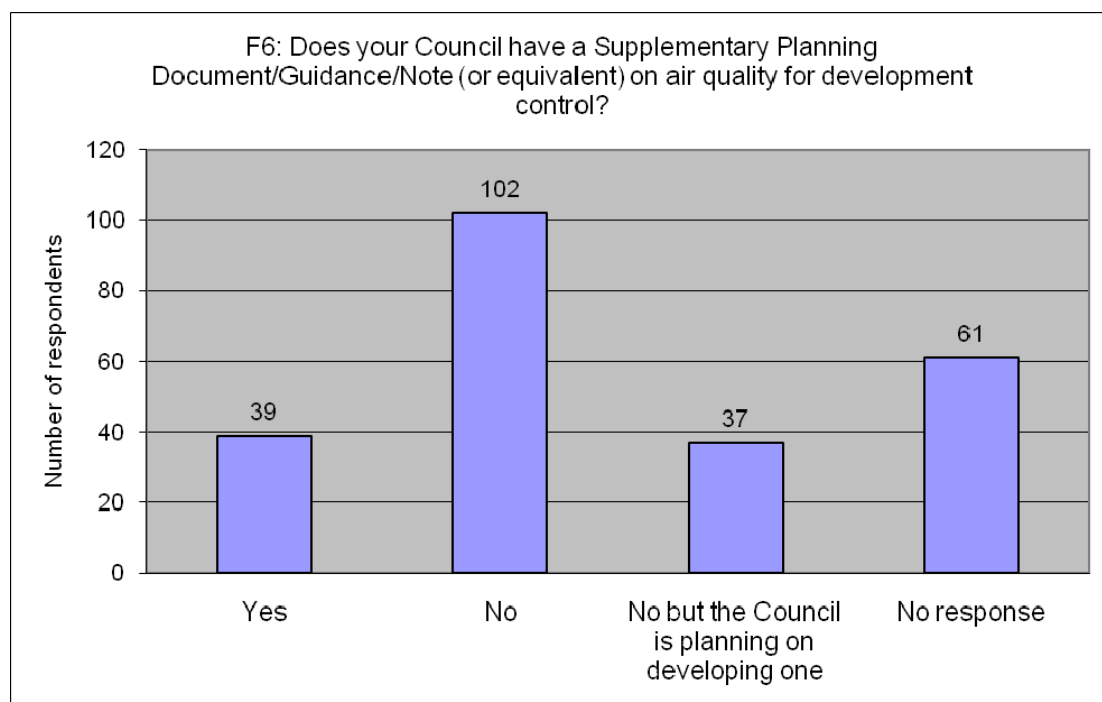**Figure 49: Quantitative response to Question F6.**

Figure 50: Response themes from Question F6.

8.6.1   Of the 239 questionnaires received, 178 respondents (74.5%) provided a quantitative response to this question.   Only 39 respondents had a Supplementary Planning Document (or equivalent) (21.9%) with a further 37 respondents (20.8%) currently in the process of developing one (Figure 49).

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The coded responses have resulted in the emergence of three themes as outlined in Figure 50.

8.6.2   Miscellaneous (48%):   Some respondents provided miscellaneous commentary on the processes by which their Supplementary Planning Documents had been developed.

8.6.3   SPD is a useful air quality management tool (32%):   Some respondents provided information in how their Supplementary Planning Documents (or equivalent) had been useful. Examples of the benefits include:

- *"gives planners and officers a consistent level of what to base new development on";*

- *"has been essential in ensuring air quality is taken into account during planning process, ensures air quality assessment are provided where relevant and that developers are made aware that funding via planning obligations for air quality monitoring and actions should be expected";* and

- *"very useful for proactive air quality management".*

8.6.4   SPD in place but needs improvements (20%):   Some respondents stated that they found the Supplementary Planning Document to be useful but it required further work. Areas of improvement that respondents identified include:

- *"needs to be incorporated into core strategies with strong and clear requirements for developers contributions on air quality grounds";*

- *"planners didn't deem it to be statutory guidance, therefore it wasn't give much weight";* and

- *"not been officially recognised within the planning service as it is seen as requiring further formal policy assessment (SEA)".*

8.7   F7: What actions has your Council taken to raise awareness of the link between air quality and health with the public or local health bodies?
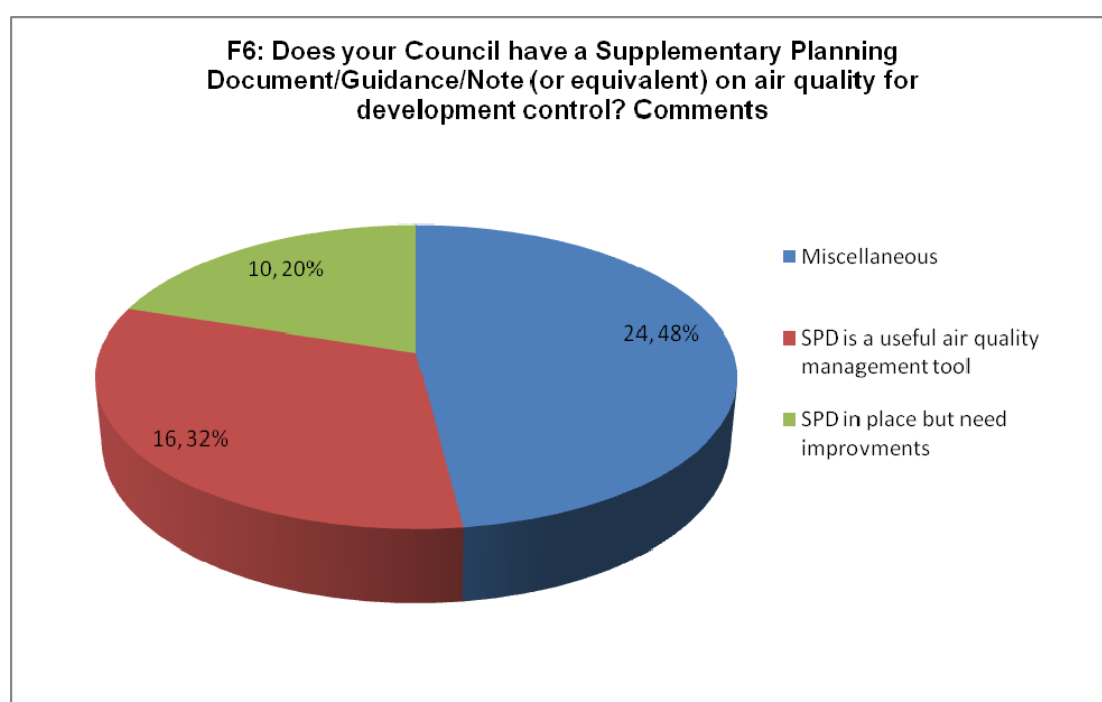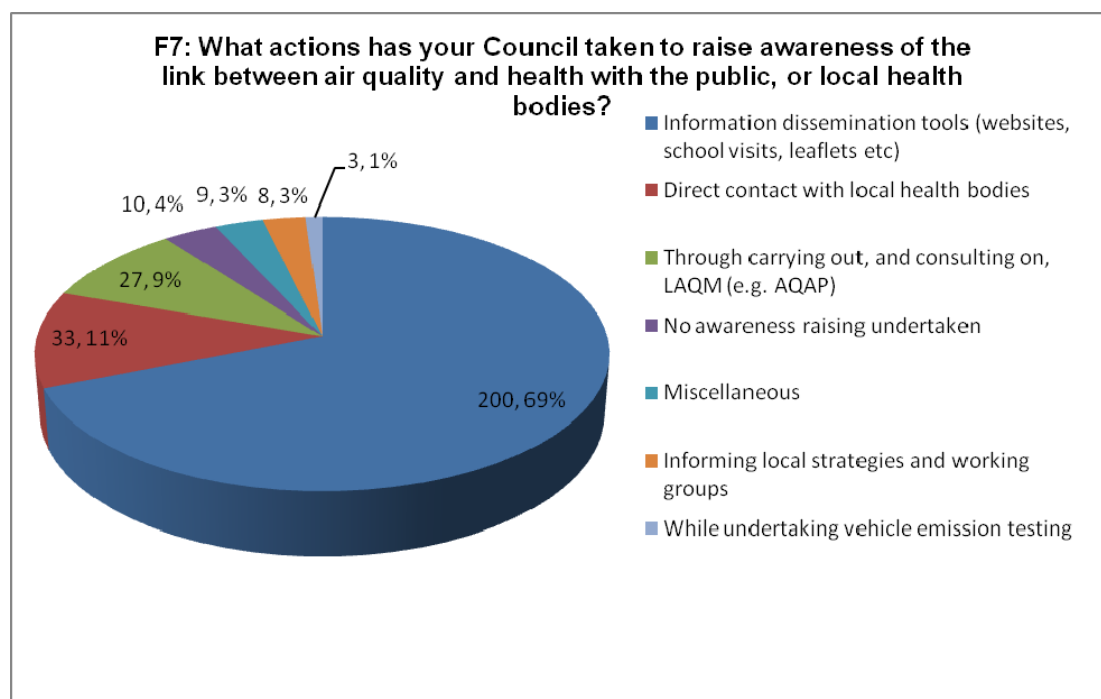

Figure 51: Response themes from Question F7.

8.7.1   Of the 239 questionnaires received, 159 respondents (66.5%) provided one or more responses to this question. The coded responses have resulted in the emergence of seven main themes as outlined in Figure 51.

8.7.2   Information dissemination tools (69%): The majority of respondents utilised different information dissemination media to raise awareness with different groups, examples include:

- *"occasional press advertisement or articles";*

- *"educational initiatives at local primary school";*

- *"promotion of Air Alert";*

- *"information on web pages";*

- *"undertaken local awareness raising days"* and

- *"we have identified two community groups who have engaged in NO_2 monitoring using diffusion tubes which bring air quality issues to a local level".*

8.7.3   Direct contact with local health bodies (11%): Some respondents have raising awareness through direct contact with local health bodies by *"inclusion in steering groups", attending local PCT meetings"* and *"working with PCT and The Ramblers on promoting walking through public events".*

8.7.4   Through carrying out, and consulting on, LAQM (9%): While undertaking their LAQM duties (particularly the declaration of AQMAs), some respondents have raising awareness with various stakeholders, including:

- *"public consultation on AQMA declarations and AQAP formulation";*

- *"health authority consulted on air quality reports";* and

- *"presentation of findings of Review and Assessment process given annually to elected members"*

8.7.5   No awareness raising undertaken (4%): Some respondents stated that they had not actively undertaken an awareness raising activities.

8.7.6   Miscellaneous (3%): Some respondents provided alternative methods for raising awareness such as *"councillor meetings"* and "*providing advice on request".*

8.7.7   Informing local strategies and working groups (3%): Awareness has been raised by some respondents through local strategies for example *"Sustainable Development Strategies", "Health and Social Care and Wellbeing Strategy"* and *"Community Strategies".*

8.7.8   While undertaking vehicle emissions testing (1%): Three respondents stated that they had engaged with the general public in raising awareness of the link between air quality and public health while *"undertaking vehicle emissions testing in the town centre".*

8.8 F8: What recommendations would you make for further action in promoting links between air quality and health policies/activities at a local and/or national level?

8.8.1 Of the 239 questionnaires received, 91 respondents (38.1%) provided one or more responses to the 'local' element of this question and 66 respondents (27.6%) provided one or more responses to the 'national' element (although there is substantial overlap between the two). The coded responses have resulted in the emergence of seven themes as outlined in Figure 52 for the 'local' recommendations and five themes as outlined in Figure 53 for the 'national' recommendations.
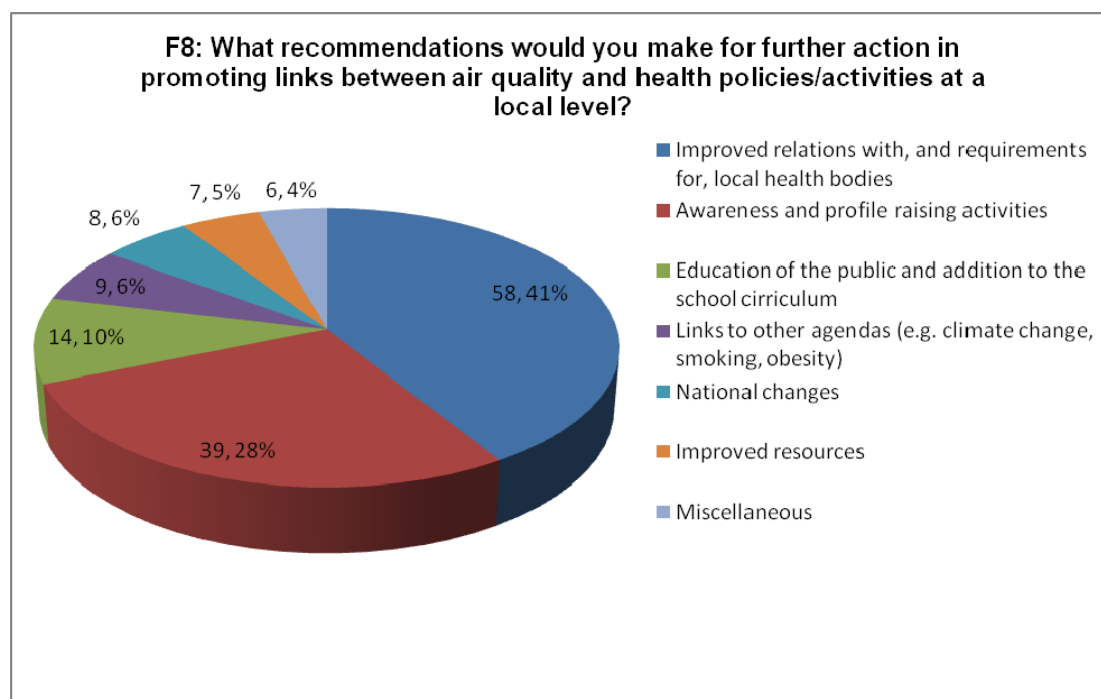
Figure 52: Response themes from Question F8 - Local.

8.8.2 <u>Improved relations with, and requirements for, local health bodies (41%):</u> Many respondents stated that *"active involvement"* of health bodies is important for the future of air quality management. Local health bodies should be involved in various elements of LAQM there should be a *"requirement of PCT to produce an air quality health strategy"* and *"undertake a health study of all declared AQMAs"*.

8.8.3 <u>Awareness and profile raising activities (28%):</u> Many respondents reiterated a *"more pro-active approach to raising awareness"* of the health implications of air quality.

8.8.4 <u>Education of the public and addition to the school curriculum (10%):</u> Respondents identified the role that educative events can have in raising awareness with the public suggesting:

- *"national / regional air quality weeks";*

- *"including more in school curriculum";* and

- *"increased publicity on the importance of air pollution".*

8.8.5 <u>Links to other agendas (6%):</u> Some respondents identified the co-benefits of linking the air quality agenda with other issues such as "*promoting links to climate change"* and *"focus on safety to encourage walking and cycling*".

8.8.6 <u>National changes (6%):</u> Some respondents suggested centrally led changes which may be of benefit to the promotion of air quality and health agendas such as *"having a national indicator"* and *"strengthen it within the Local Area Agreement process".*

8.8.7 <u>Improved resources (5%):</u> A few respondents called for more resources to *"allow more health promotion activities"* with one respondent suggested that resources should be directed towards *"local doctors to enable them to participate".*

8.8.8 <u>Miscellaneous (4%):</u> One respondent queried the actual benefits of promoting links between air quality and health suggesting that there may not be *"any significant influence on changing behaviour".*
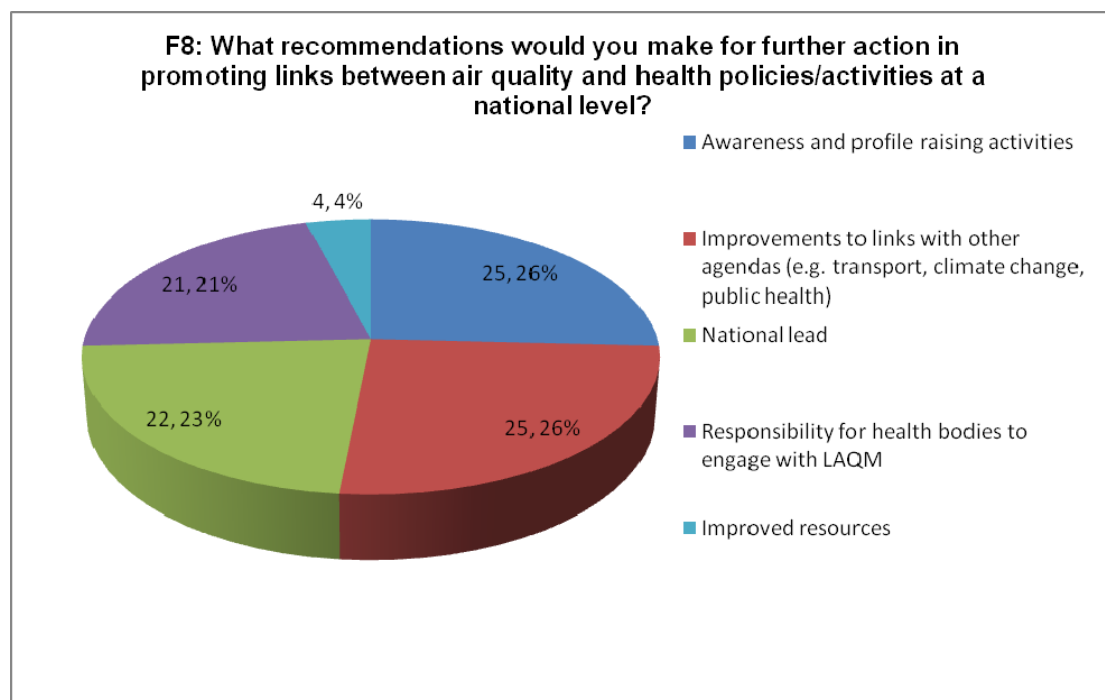
Figure 53: Response themes from Question F8 - National.

8.8.9 <u>Awareness and profile raising activities (26%):</u> There was a common call by respondents for central government to take a pro-active role in awareness and profile raising activities such as:

- *"greater press coverage and awareness";*

- *"air quality week sponsored by Defra";*

- *"introduce an educational programme for sufferers of respiratory and cardiovascular illnesses on managing their illness during pollution episodes";* and

- *"publish statistics by local authority area on extra deaths attributable to poor air quality episodes".*

8.8.10 Improvements to links with other agendas (26%): Respondents supported the improvements of links with other agendas such as "*promoting links with climate change and opportunities for mutual benefits*" but also ensuring that it *"does not adversely impact LAQM activity by taking resources and attention away from it"*. Other respondents also suggested the *"promoting the benefits of health via Walking/Cycling and good air quality"*.

8.8.11 National lead (23%): Some respondents suggested that *"this needs to be done nationally or no one will take any notice locally"*. Other initiatives suggested for central government include *"more comprehensive pollution bandings", "national indicator for air quality to draw attention to Local Area Agreements"* and *"support for wider Low Emission Strategy initiatives"*.

8.8.12 Responsibility for health bodies to engage with LAQM (21%): Respondents stated that they would like to see more of a *"government push to raise the profile or air quality with PCTs"* suggesting that there was a need for *"greater involvement with medical researchers investigating the effects of poor air quality"* and the introduction of *"statutory health plans"*.

8.8.13 Improved resources (4%): Again some respondents reiterated the theme of improved resources to facilitate such activities.

8.9   F9: Can you suggest ways in which links between climate change and air quality responsibilities could be made more efficient and/or effective within your Council/other responsible bodies?
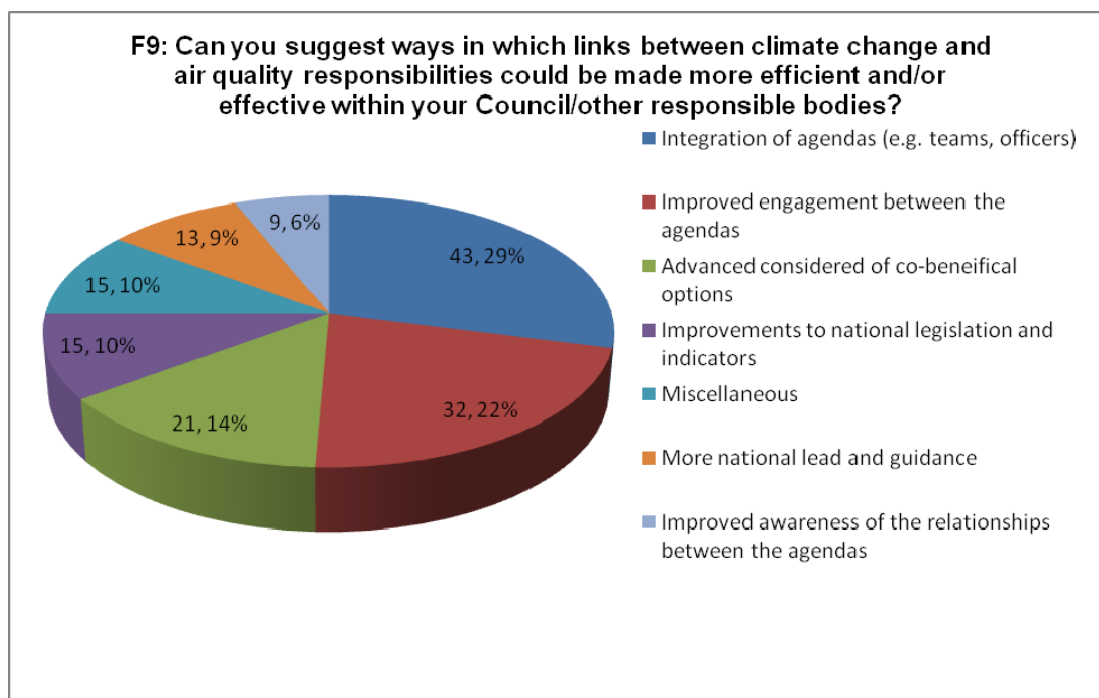
Figure 54: Response themes from Question F9.

8.9.1   Of the 239 questionnaires received, 100 respondents (41.8%) provided one or more responses to this question. The coded responses have resulted in the emergence of seven main themes as outlined in Figure 54.

8.9.2   Integration of agendas (29%): Many respondents recognised the opportunity for integration of the teams, officers and policies of both agendas as being important. Some proactive respondents who already had close linkages suggested that the promotion of *"both strategies jointly, particularly at a member level, to try and minimise air quality being overshadowed by climate change"*.

8.9.3   Improved engagement between agendas (22%): Some respondents identified *"interdepartmental co-operation and liaison"* and *"better communication and co-ordination"* would be a positive step forward in strengthening the links between climate change and air quality.

8.9.4   Advanced consideration of co-beneficial options (14%): Respondents suggested that all options, measures and activities put forward by either agenda should be *"adequately considered"* to identify any co-benefits and where possible avoid trade-offs.

8.9.5   Improvements to national legislation and indicators (10%): Some respondents called for improvements to national legislation and indicators, suggesting:

- *"a joint National Indicator instead of NI185 and NI194"* or *"compulsory adoption of NI194"* but some respondents voiced concerns stating *"NI194*

could do with improvements to ensure it gets a consistent level of accuracy before year on year comparisons become meaningful"; and

- *"the legislation which drives these two subject areas needs to be more closely linked to ensure responsible officers work more closely together".*

8.9.6   <u>Miscellaneous (10%):</u>   Some respondents were *"not convinced that better links between air quality and climate change would result in improvements in either"* and stated that it is very important to *"ensure air quality is not lost within climate change".*

8.9.7   <u>More national lead and guidance (9%):</u>   Respondents suggested that a *"positive coherent lead and support from central government would be a good start"* to promoting the linkages between the two agendas. Others suggested *"explicit guidance on the links between air quality and climate change at a local level to promote it as a local priority"* would also be helpful.

8.9.8   <u>Improved awareness of the relationships between agendas (6%):</u>   A few respondents reiterated a common theme of *"raising awareness"* particularly on the *"air quality implications of actions"* of the climate change agenda.

8.10 F10: Are there any other comments you would like to make regarding the LAQM process that haven't been address by the questions in this survey.

8.10.1 Of the 239 questionnaires received, 55 respondents (23.0%) provided additional commentary. Many of the points raised re-iterated those identified in the main questionnaire. Reiterated themes included:

- Calls for improvements to resources to assist authorities in undertaking their LAQM duties;

- Concerns with process issues including issues with PM_{10} monitoring techniques, limitations of time between declaring an AQMA and developing an AQAP and a call for consistency between the local system and national system for managing and reporting air quality; and

- Calls for improvements to national guidance, engagement with other agendas (particularly transport), consideration of time and burden issues for local authorities and recognition of the importance of retaining of the statutory basis of the process.

Appendix 1: Covering Note to Accompany the Questionnaire

Dear [FirstName],

Defra has commissioned their Review and Assessment Contractors (Air Quality Consultants Ltd and the University of the West of England, Bristol) to carry out a survey of local authority views on the Local Air Quality Management (LAQM) process within the UK.

Delivering the air quality objectives and European air quality limit values is a challenging task for many areas of the UK, and Defra and the Devolved Administrations fully recognise the important role that local authorities can play in helping to meet these obligations. This questionnaire is aimed at exploring how the LAQM process might be improved to assist with these challenges.

YOUR VIEWS ARE IMPORTANT and will help inform the future development of LAQM in the UK. You have been identified as the primary contact for air quality matters in your authority. This survey should be completed either by yourself or the person most suitable to answer the questions in the survey.

The survey can be accessed here: [SurveyLink]

If you would prefer to complete the survey off-line or on paper using a Word document, please contact us by email at aqm-review@uwe.ac.uk and we can send you a copy. The questionnaire is quite comprehensive but should not take longer than an hour to complete. Some questions will not be relevant for those authorities without AQMAs and Air Quality Action Plans, please just leave these unanswered if they do not apply to you. If you have difficulty in answering all of the questions, please, as minimum, try and ensure that you have answered those in 'Section B: Overview of LAQM'.

Participants are assured that the information obtained in this questionnaire will be treated with strict confidentiality. Its purpose is to inform the future development of LAQM in the UK, not to highlight the views or identity of any individual officer or authority. You retain the right to withdraw from the survey now or at any time in the future. It would be greatly appreciated if you would complete and return the questionnaire as soon as possible, but there is a final deadline of **16th October 2009**.

If you have any queries regarding the questionnaire or the project in general, do not hesitate to contact us.

Many thanks for your assistance,

Review and Assessment Helpdesk Team

_____93_____

Email: aqm-review@uwe.ac.uk

Telephone: 0117 32 83668

Appendix 2: Example of Questionnaire

SECTION A: INTRODUCTORY INFORMATION

The following section seeks basic information about the Council and the resources available to your Council to carry out your LAQM duties.

Providing details of your council and your role would be very useful and all responses will be kept confidential and anonymous (in terms of both officer and council). However, if you would rather not give this information feel free not to do so.

A1: Name of Council

Which part of the UK is your Council in?

▢ Scotland

▢ Northern Ireland

▢ Wales

▢ London

▢ England (not London)

How would you describe you Council area?

▢ Urban

▢ Metropolitan

▢ Predominantly Rural

A2: Your position in the Council

A3: Please provide a short description of the resources available to your Council to carry out your LAQM duties e.g. number of staff working on air quality, relevant experience of staff, estimates of staff time devoted to Local Air Quality Management, whether you employ consultants to undertake work for you, and if so for what tasks, if you have ever applied for and/or received AQ Grant or SCA funding from Defra, or equivalent funding from the devolved administrations?

This section provides an opportunity to comment on the main points of local air quality management (LAQM) process as a whole rather than on specific elements.

B1: What do you identify as the main strengths of LAQM process as a whole?

i)

ii)

iii)

B2: What do you identify as the main weaknesses of the LAQM process as a whole?

i) [   ]

ii) [   ]

iii) [   ]

B3: Could any further actions and support be usefully provided by central government to facilitate local authorities in undertaking their LAQM duties?

i) [   ]

ii) [   ]

iii) [   ]

B4: What do you identify as the main changes (including legislative changes) you would like to see implemented to improve the LAQM process as a whole?

i) [   ]

ii) [   ]

iii) [   ]

B5: Any other comments?

[   ]

This section seeks your views on the Review and Assessment elements of the LAQM process. It covers all aspects of the Review and Assessment process leading up to the point of identifying the need for an Air Quality Management Area, including – Updating and Screening Assessments, Review and Assessment Progress Reports, Detailed Assessments, together with any associated air quality monitoring, atmospheric dispersion modelling studies etc. Air Quality Management Areas and Air Quality Action Plans are covered in subsequent sections.

C1: Are there any ways in which the Review and Assessment stages of LAQM have assisted your Council?

i) [   ]

ii) [   ]

iii) [   ]

C2: Are there any particular difficulties you have encountered in undertaking your Review and Assessment duties and what actions have been taken, if any, to resolve them?

i) [   ]

ii) [   ]

iii) [   ]

C3: What changes would you recommend to make the Review and Assessment process more effective and/or efficient?

i) [   ]

ii) [   ]

iii) [   ]

This section seeks your views on the AQMA element of the LAQM process (please note – even if your Council has not declared an AQMA your thoughts on the process are appreciated). This section covers your selection of the area(s) to declare, including consultation on the AQMA and its designation, through to the point of developing your Air Quality Action Plan. Air Quality Action Plans will be covered in the next section.

D1: Is a Local Air Quality Management process based on the designation of AQMAs the most appropriate way to bring about air quality improvements at the local level?

☐ Yes

☐ No

Other (please specify)

[   ]

D2: Has your Council declared an Air Quality Management Area?
If 'Yes', please answer D3, D4 and D5. If 'No' please proceed to Section E.

☐ Yes

☐ No

D3: What are the main sources of pollution leading to the declaration of your AQMA(s)?

	Main source	Significant contributor	Will affect background concentrations	Unlikely to significantly affect air quality	N/A
Road transport (National Roads)	☐	☐	☐	◉	☐
Road transport (Local)	☐	☐	☐	☐	☐
Road transport (Mixed Roads)	☐	☐	☐	☐	☐
Industrial sources	☐	☐	☐	☐	☐
Domestic Sources	☐	☐	☐	☐	☐

Other (please specify)

[   ]

D4: Has the declaration of an AQMA helped your Council in addressing air quality problems? **If so, please explain how.**

i) [ ]

ii) [ ]

iii) [ ]

D5: Have you encountered any difficulties during the declaration of your AQMA or subsequently, and what actions have been taken, if any, to resolve them?

i) [ ]

ii) [ ]

iii) [ ]

This section seeks your views on the AQAP element of the LAQM process, in particular any difficulties involved in developing a successful action plan and working with people and groups outside the AQ team.

E1: Has your council prepared, or is it in the process of preparing an Action Plan?

☐ Prepared   ☐ Not Required ('Excellent' Authority)

☐ Preparing   ☐ Not Required (No AQMA)

☐ Not Started

E2: How has the development of an Action Plan been of use to your Council?

i) [ ]

ii) [ ]

iii) [ ]

E3: What have been the main factors that have constrained the development of your AQAP? What actions have been taken, if any, by your Council to resolve them?
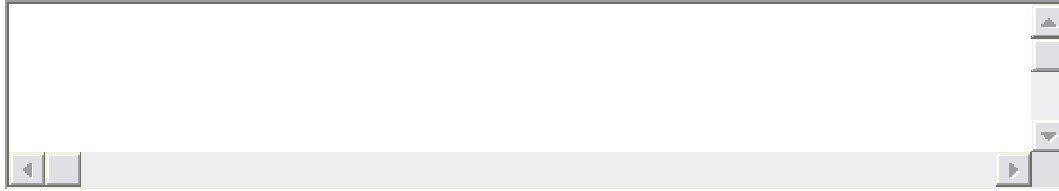
i) [ ]

ii) [ ]

iii) [ ]

E4: Are there any ways in which the effectiveness of the overall process of AQAP development and implementation could be improved?

i) [ ]

ii) [ ]

iii) [ ]

E5: Which department was primarily responsible for drawing up your AQAP? Please comment on the reasons for choosing this Department, the

advantages/disadvantages in doing so, and if you would choose the same Department again if another AQAP was required.
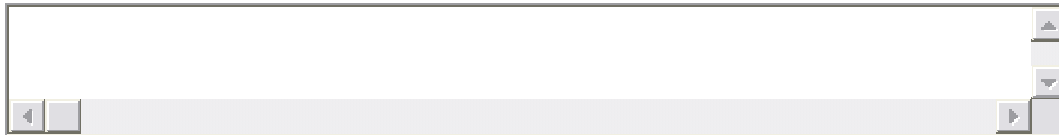
[text area]

E6: Is your AQAP integrated into the LTP (English Authorities only)? Do you have any views on this?

☐ Yes

☐ No

Comment

[text area]

E7: Has a steering group (or any other group to co-ordinate the work) been established to oversee the Action Plan?

☐ Yes

☐ No

E8: Have other departments, organisations or groups (e.g. transport authority, local health body, freight operators, community groups etc.) been integral to the AQAP process?

☐ Yes

☐ No

E8a: If 'Yes', what departments/organisations are, or have been involved? Please comment on the nature of their involvement and the degree to which the inclusion of these departments/organisations/groups helped the AQAP process? Please indicate with a * if they were members of a steering group.

i) [input field]

ii) [input field]

iii) [input field]

iv) [input field]

v) [input field]

vi) [input field]

vii) [input field]

viii) [input field]

Comment

[text area]

E8b: If 'No', please comment on the reasons other departments/organisations/groups were not involved, and if you were to develop another AQAP would you chose to do things differently?

[text area]

E9: Do you have any views on the role of AQAP Progress Reports?

i) [text field]

ii) [text field]

iii) [text field]

This section seeks to draw out your relationship with other policies. It primarily considers transport and land-use colleagues and the links between air quality and health.

F1: Does your Council have a Local Air Quality Strategy?

○ Yes

○ No

○ No, but the Council is planning on developing one

If 'No' please provide reasons why?

[text area]

F2a: If you have a Local Air Quality Strategy, has it assisted your Council?

○ Yes

○ No

F2b: Please describe ways in which your Local Air Quality Strategy has been helpful or not helpful.

i) [text field]

ii) [text field]

iii) [text field]

F3: Are you consulted adequately on schemes that might have an effect (positive or negative) on air quality?

	Always	Usually	Sometimes	Rarely	Never
Transport Schemes	○	○	○	○	○

	Always	Usually	Sometimes	Rarely	Never
New Planning Developments	☐	☐	☐	☐	☐
Biomass or Other Climate Change Related Proposals	☐	☐	☐	☐	☐
Other (please state below)	☐	☐	☐	☐	☐

Other (please specify)

[text box]

F4: What steps could be taken to improve inter-departmental relationships relating to air quality within your Council or with other bodies?

i) [text box]

ii) [text box]

iii) [text box]

F5: Have you ever sought support from the relevant highways authority in undertaking your LAQM duties (e.g. the preparation of your Action Plan)?

☐ Yes

☐ No

If 'Yes' what did you contact them about and did you receive an adequate level of support?

[text box]

F6: Does your Council have a Supplementary Planning Document/Guidance/Note (or equivalent) on Air Quality for development control?

☐ Yes

☐ No

☐ No, but Council is planning on developing one

If 'Yes' how useful has it been to your Council?

[text box]

F7: What actions has your Council taken to raise awareness of the link between air quality and health with the public or local health bodies?

i) [text box]

ii) [text box]

iii) [text box]

F8: What recommendations would you make for further action in promoting links between air quality and health policies/activities at a local and/or national level?

Local i)

Local ii)

Local iii)

National i)

National ii)

National iii)

F9: Can you suggest ways in which links between climate change and air quality responsibilities could be made more efficient and/or effective within your Council/other responsible bodies?

i)

ii)

iii)

Are there any other comments you would like to make regarding the LAQM process that haven't been addressed by the questions in this survey?

Thank you for taking the time to complete this survey.
Please return this document by email to aqm-review@uwe.ac.uk