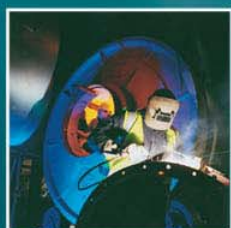
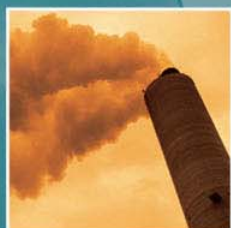


Defra

# Mapping Air Quality Action Plan Guidance available to Local Authorities

Final Report

14 April 2011



**Entec**  
An AMEC company

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V1	Draft Report (internal)	March 2011
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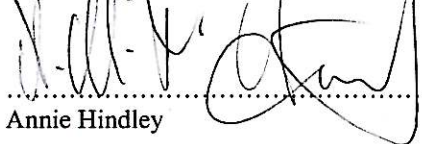
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## Defra

# Mapping Air Quality Action Plan Guidance available to Local Authorities

Final Report

14 April 2011

Entec UK Limited



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## Executive Summary

### Purpose of this Report

Defra has identified some potential issues with the preparation and execution of Air Quality Action Plans (AQAP) and the identification of suitable measures which will assist local authorities with improving air quality within their areas.

This report provides a summary of a desk-based study undertaken by Entec UK Limited (Entec) which aimed to map the guidance available to local authorities in England, with regards to Air Quality Action Planning. The mapping exercise was structured around the following three objectives:

- To identify the tools and guidance currently available to local authorities to help them with developing and implementing measures to improve air quality and assessing the effectiveness of these measures;
- To identify any gaps or shortcomings in available guidance, tools or other resources; and
- To make recommendations on how best to improve the current guidance by, for example, disseminating examples of good practice, raising awareness of the guidance available, and ensuring that guidance/examples are more widely available.

### Methodology

Entec has undertaken a desk-based study that has aimed to identify all available guidance and tools which local authorities in England can use to assist them in developing their AQAPs.

Entec has also worked with Defra in conducting an informal telephone survey of a small number of local authorities and other stakeholders in order to gather their views on whether there were currently any gaps or shortcomings in the available guidance, how these gaps could be filled and how shortcomings could be overcome.

### Summary and Recommendations

The mapping exercise has identified a wide range of guidance, tools and information from several sources available to local authorities to assist them with Action Planning.

The process of Action Planning was generally considered to be effective by all those contacted as part of this study. The Local Air Quality Management (LAQM) regime was thought to be effective at identifying areas where the Air Quality Objectives (AQOs) were likely to be exceeded, although Action Plans were not necessarily considered to be entirely effective in terms of improving air quality.



Shortcomings in the guidance that were identified relate mainly to the availability and accessibility of information to support the development of an Action Plan, rather than deficiencies in the guidance itself. However, the guidance and tools available at present are located within a range of different documents and are hosted on websites of government departments and other organisations, making them difficult to find and updates difficult to monitor. A detailed and regularly updated library that includes all of the guidance and information, which is easy to find on the Defra website, would be of use to local authorities.

Local authorities would also like to see more real-life examples of the implementation of air quality improvement measures that explains how the measures were established and providing information as to how successful they have been in terms of reducing emissions or improving ambient air quality. It is also considered that Defra may wish to consider developing measures-based Action Plan tools that assist local authorities in identifying measures that are appropriate to their specific air quality issues, based on the nature of the emission source, the type of area the local authority is situated within (i.e. metropolitan, urban or rural) and what level of concentration reduction is required to meet the Air Quality Objectives.

Recommendations made in this document in relation to Action Planning and improvements to tools and the guidance are highlighted in Table I below. Table I also highlights the feasibility in terms of likely costs (low, medium, high) and the likely timescales involved in implementation of these recommendations.

**Table I Summary of recommendations**

Recommendation	Feasibility of Implementation	
	Cost	Timescales
1. List of Guidance available to Local Authorities relating to Action Planning and Action Plan measures.	Low	Short
2. Regular update of library and provision of alert service for new guidance	Low	Short
3. Forum (internet based) for local authorities	Low	Medium
4. More examples of best-practice, its implementation and likely effectiveness	Low	Ongoing
5. Portfolio of measures for local authorities – categorised as to their effectiveness	Low	Ongoing
6. Guidance for those local authorities reviewing and updating their existing AQAPs	Medium	Medium
7. Spreadsheet tool to assess effectiveness of range of measures	Medium	Long
8. Set of national “softer” measures for all local authorities	Medium	Medium - Long
9. Guidance for awareness raising of air quality amongst public and local councillors	Medium	Medium
10. Endorsement of air quality guidance by DfT, Highways Agency (HA) and other government departments	Low	Ongoing
11. Guidance and awareness raising of the synergies between air quality and climate change	Low	Short



Notes: Estimated Cost criteria: Low = less than £10,000, Medium = £10,000 to £50,000, High = more than £50,000.  
Estimated Timescale criteria: Short = less than 6 months, Medium = 6 – 24 months, Long = more than 24 months.



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# 1. Introduction

## 1.1 Project context

Entec UK Ltd has been commissioned by Defra to undertake a review of the guidance available to local authorities with regards to Action Planning and the implementation of effective air quality improvement measures as well as to provide recommendations for improving the guidance. Only England has been included within the scope of this study.

Defra has identified potential issues with the preparation and execution of Action Plans developed by local authorities in order to assist them with improving air quality within their areas.

When the Government's strategic policies for air quality management were published in 1995, the expectation was that national policies would significantly drive down emissions of most pollutants. At the same time it was also recognised that these national policies would not be equally effective in all geographical areas of England and consequently, local action would be required to help move towards the achievement of the Government's Air Quality Objectives.

It was also expected that only a small number of local authorities, primarily those in cities and metropolitan areas, would have a requirement to designate AQMAs. However, the current position in England is that 216 local authorities have declared 529 AQMAs. Some local authorities have declared the whole of their administrative areas as an AQMA, whereas others have declared AQMAs where "hot spots" of poor air quality occur within their area; hence the difference in the number of local authorities who have declared AQMAs and the actual number of AQMAs themselves. Road traffic emissions are the main contributor to current and forecast exceedences of the AQOs.

Although national emission reduction policies have succeeded historically in reducing ambient pollutant concentrations, the levels of reductions, particularly in relation to NO<sub>2</sub> and PM<sub>10</sub>, have not been realised in some locations in recent years<sup>1</sup>. Roadside concentrations of NO<sub>2</sub> in particular have shown only a very small downward trend, and more recently there have been increases at some roadside locations in England. Concern has therefore been expressed by Government that Action Plans are not leading to the level of improvement in local air quality that is needed. Of all the AQMAs declared, only a very small number have been revoked owing to successful Action Planning at a local authority level.

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<sup>1</sup> Carslaw et al for Defra. Trends in NO<sub>x</sub> and NO<sub>2</sub> emissions and ambient measurements in the UK. 3<sup>rd</sup> March 2011.



## 1.2 Aims

This project aimed to identify the guidance available to local authorities to assist with developing and implementing effective air quality improvement measures and provide recommendations for improving the current guidance.

## 1.3 Methodology

### 1.3.1 Overview

The three main tasks were:

- Task 1: Mapping the Current Guidance;
- Task 2: Identification of Shortcomings in Available Guidance; and
- Task 3: Recommendations for Process Improvements.

The underlying basis for the undertaking of these tasks was a broad consultation with a range of stakeholders. These are listed in Appendix A. The informal survey was conducted through pre-arranged telephone interviews using a pro-forma questionnaire. The questionnaire was pre-filled for each consultee and sent to them via email to allow for further updates. The pro-forma questionnaire is shown in Appendix B.

The purpose of the informal survey was to collate the opinions of key parties on the process of Action Planning and its effectiveness, as well as confirming levels of guidance and advice that are currently available to local authorities, both formal and informal, and what short-medium term plans each organisation may have for developing their own further guidance on Action Planning.

### 1.3.2 Task 1: Mapping the Current Guidance

Entec has undertaken desk-based research and consultation with the aim of identifying guidance that is available to local authorities to support the action planning process. As well as undertaking a detailed internet-based literature search, the mapping exercise has also included a review of the information available from, and undertaking telephone consultation with, the organisations listed in Appendix A.

The consultation aimed to include all key organisations involved in developing and disseminating advice, developing and implementing measures and assessing their effectiveness at both a local and national level. Also included in the consultation were 22 local authorities that have been involved in the Action Planning process and have practical experience of its implementation.



The local authorities that were consulted had a diverse geographical range and also included authorities that had wide ranging air quality issues that needed to be addressed through the Action Planning process. This included inner city and more metropolitan authorities with wide-scale and borough-wide air quality issues with road traffic, to those with air quality issues at one or two receptors that had led to AQMA declaration.

Although a large amount of work has been undertaken in Europe in relation to tackling air quality, and in particular, the introduction of LEZs, it was not felt that this study could effectively gauge all the guidance and tools available in other countries within the timescales of this study. The scope of this study has therefore concentrated on available guidance in England.

### 1.3.3 Task 2: Identification of Shortcomings in Available Guidance

The key objective of this task was to identify whether there are any gaps or shortcomings in the guidance, tools or other resources identified under Task 1, taking into consideration the number of AQMAs that have been declared across the UK and complexities involved in developing cost-effective local measures that have the potential to reduce pollutant concentrations.

The output of this task was largely a qualitative review of the available guidance in terms of its effectiveness, highlighting, with input from stakeholders, where the deficiencies and short comings are considered to be.

### 1.3.4 Task 3: Recommendations for Process Improvements

The overall objectives of this task were to consider how existing guidance may be improved and/or what additional guidance tools and best-practice might be helpful to local authorities and others involved in the identification of measures to improve air quality and monitoring ongoing progress towards achieving the AQOs. Consideration has also been given to how to make best use of current and new information technology and other systems to support the provision of these tools.

## 1.4 Structure of the Report

The remainder of the report has been structured as follows:

- Section 2: Findings of the Mapping Exercise;
- Section 3: General views from stakeholders on the Action Planning Process;
- Section 4: Shortcomings in the Action Plan Guidance identified by stakeholders;
- Section 5: Stakeholder recommendations for Improvements;
- Section 6: Discussion of the Action Plan process in view of consultee's comments and requirements for further guidance and tools.



The report concludes with a summary of the findings of the three tasks and the conclusions drawn from this study.



## 2. Mapping Exercise

### 2.1 Overview

This task has identified a range of guidance documents and tools that are available to local authorities. These are summarised in Tables 2.1, 2.2 and 2.3. The following sections provide a brief overview of the guidance and tools available and how these relate to Action Planning. Appendix C includes a list of all the individual items of available guidance and tools with hyperlinks.

### 2.2 Defra Guidance and Tools

Table 2.1 provides a summary of the various guidance documents and tools which Defra has developed for the Local Air Quality Management regime and how they relate to Action Planning. These guidance documents have been developed over a period of several years and are available to view and download from the Defra website. As shown in Table 2.1, there are a large range of guidance documents all relating to specific elements of LAQM and Action Planning.

**Table 2.1 Defra Guidance and Tools Available for Action Planning**

Guidance/Tools	Date Issued	Relevance to Action Planning
<b>Policy Guidance</b>		
Defra 2009. Local Air Quality Management Policy Guidance (PG09).	February 2009	Provides brief overview of the LAQM process, Local air quality strategies, AQMAs, AQAPs, Consultation practice, Transport linkages, Planning linkages, further pointers to practical guidance (these may need to be updated as the consultants and websites have altered). Hyperlinks to documents of use in the sections in this document are also included.  The Practice Guidance documents accompany PG (09)
<b>Technical Guidance</b>		
Defra 2009. Local Air Quality Management Technical Guidance LAQM. TG (09).	February 2009	Provides a technical guidance in relation to LAQM duties for local authorities. Also includes technical guidance on both monitoring and modelling and technical guidance in relation to all parts of the LAQM process.
Defra and Low Emission Strategies Partnership 2010. Low Emissions Strategies Guidance 2010 using the planning system to reduce transport emissions.	January 2010	Guidance gives examples from Beacon Councils who have used the planning system to reduce emissions associated with developments, both in construction and operational phase.



**Table 2.1 (continued) Defra Guidance and Tools Available for Action Planning**

Guidance/Tools	Date Issued	Relevance to Action Planning
<b>LAQM Practice Guidance – to accompany PG. (09)</b>		
Practice Guidance on economic principles for the assessment of local measures to improve air quality	February 2009	Contains economic appraisal methods for assessment of local AQ measures and schemes. Consideration of climate change and changes in economic instruments (tax) in the methodology. Approach with the Treasury's Greenbook Guidance – this uses a cost-benefit analysis approach.
Defra 2009. Local Air Quality Management Practice Guidance 2. Practice Guidance to local authorities on low emission zones.	February 2009	The guidance provides information on selecting methods for implementing this measure, practical issues that have arisen in implementing previous examples of this measure and advice on appraising potential costs and air quality benefits of the measure in cost-effectiveness and cost-benefit analyses.
Defra 2009. Local Air Quality Management Practice Guidance 3 to local authorities on measures to encourage the uptake of low emission vehicles.	February 2009	Guidance for selecting methods for the implementation of LEVs, applying LEV restrictions to areas, practical issues relating to LEVs discussed via examples, and cost-benefit analysis of LEVs.
Defra 2009. Local Air Quality Management Practice Guidance 4. Practice guidance to local authorities on measures to encourage the uptake of retro-fitted abatement equipment on vehicles.	February 2009	Guidance sets out the implementation steps required, provides examples and provides a cost-benefit analysis of retro-fitting equipment.
<b>Tools</b>		
Defra 2009. Local Air Quality Management Guidance. Worked Examples for the Practice Guidance.	February 2009	Examples are provided of the spreadsheet for calculating costs and benefits associated with measures in Practice guidance.
Good Practice Examples of Action Plans	Various	Good practice examples of Action Plans completed by local authorities which highlight a particular measure or approach.
Case Studies	Various	Various case studies highlighting measures and the implementation of these measures and their effect on air quality
LAQM Helpdesk		Phone number and email address to contact the LAQM help desk to ask questions in relation to Action Planning
FAQ's	Various	Summary of frequently asked questions to the Helpdesk in relation to Action Planning and other issues in relation to air quality for local authorities.
Emission Factors Toolkit	September 2010	Toolkit for calculating emissions from various sources.
Tools for Monitoring data	Various	Various tools for converting monitoring data suitable for review and assessment purposes.



## 2.3 Other UK Guidance and Tools

Other guidance and tools relating to the various aspects of Action Planning have also been developed by a range of bodies in the UK such as Environmental Protection UK (EPUK)<sup>2</sup> and London Councils. These guidance documents and tools are listed in Table 2.2, which also provides a brief overview of how these guidance and tools are useful for Air Quality Action Planning.

**Table 2.2 Other Guidance and Tools Available for Action Planning**

Guidance/Tools	Date Issued	Relevance to Action Planning
<b>Environmental Protection UK</b>		
EPUK 2009. Biomass and Air Quality Guidance for Local Authorities (England and Wales).	June 2009	Risk based approach for Local Authorities in terms of assessing impacts of biomass. Also provides a lot of background information in relation to biomass technologies and types as well as tools which can be used for assessment of impacts. Tools to accompany this guidance are also available.
NSCA 2001. Declaring AQMAs: Turning Reviews into Action	Spring 2001	Guidance for Local Authorities on devising an AQAP. This has since been revised and updated following Round 1 of LAQM and now forms part of the following guidance.
NSCA 2004. Air Quality Management Areas: A Review of Procedures and Practices for Local Authorities	2004	Guidance and toolkit in relation to the definition and declaration of an AQMA – specifically pertaining to declaring its size, effect on planning, scientific reasoning behind determining the AQMA.
NSCA 2000. Air Quality Action Plans: Interim Guidance for Local Authorities.	November 2000	This guidance was drafted in response to the first round of the LAQM regime to assist local authorities in understanding the process of setting out an Action Plan and the elements which need to be considered. Also includes guidance in relation to air quality strategies. This was followed by Air Quality: Planning for Action Guidance.
NSCA 2001. Air Quality: Planning for Action: Part 2 of the NSCA's guidance on the development of Air Quality Action Plans and Local Air Quality Strategies.	June 2001	This guidance contains case studies to show the Action Planning process and the application of Action Planning.
EPUK 2010. Development Control: Planning for Air Quality (2010 Update).	April 2010	Guidance for Local Authorities highlighting the significance of impacts – can be useful in identifying AQMAs.
NSCA. Consultation for Local Air Quality Management: the how to guide.	2001	Guidance for Local Authorities on how to consult with stakeholders regarding the LAQM process.
EPUK 2011. Air Quality and Climate Change: Integrating Policy within Local Authorities.	2011	Outlines the benefits of an integrated approach to air quality and climate change and what measures can be implemented to the benefit of both. Case studies are also provided.

<sup>2</sup> Formerly the National Society for Clean Air and Environmental Protection (NSCA).



**Table 2.2 continued Other Guidance and Tools Available for Action Planning**

Guidance/Tools	Date Issued	Relevance to Action Planning
<b>London Councils</b>		
London Councils 2007. Air Quality and Planning Guidance. Revised Version.	January 2007	Provides Technical advice on how to deal with planning application which might affect air quality. Meant to provide a consistent approach to dealing with planning application which could affect air quality across London.
London Councils 2006. Control of dust and emissions from construction and demolition. Best Practice Guidance.	November 2006	Best Practice measures and guidance for construction and demolition sites in London.
<b>Beacons LES Group –now the Low Emission Strategies Partnership</b>		
Defra and LES Partnership 2010. Low Emission Strategies – Using the planning system to reduce transport emissions	January 2010	This guidance is the same as the Defra guidance in previous table which was developed in conjunction with the LES partnership.
<b>University of the West of England, Bristol</b>		
UWE 2006. Steps to Better Practice: Guidance for Local Authorities on LAQM Consultation.	2006	Study undertaken by UWE to assist Local authorities in their consultation exercises. Provides 10 steps for better consultation as well as providing guidance for a flexible approach for Local authorities based on the findings of the study “Consultation as Science Communication: The case of Local Air Quality Management”. Also provides some useful reference documents regarding consultation and community engagement.
<b>Various Local Authorities</b>		
Supplementary Planning Guidance	Various	Several local authorities have produced their own supplementary planning guidance in relation to air quality and planning. This has often been put together for developers to ensure all air quality assessments submitted as part of a planning application have considered air quality within the local authority area and have considered mitigation measures for the development which have been incorporated into the development plan.

## 2.4 Guidance from Other Government Departments

Air quality is linked to a number of other policy areas which are overseen by different government departments. These government departments have produced guidance in relation to their policy areas, some of which could have benefits in terms of air quality. Those documents, which are of use in terms of Action Planning, are presented in Table 2.3.

As with the other guidance documents, most are available on the websites for the government departments, with signposting to these webpages and specific documents on the Defra website in the Local Air Quality Management section. A number of these schemes and measures are also noted within LAQM.PG(09).

Both the Environment Agency and the Highways Agency have contact email addresses for enquiries from Local Authorities wishing to work with these departments with regards to LAQM.





Most of the references in Table 2.3 are for actual web pages as there is no specific downloadable guidance document available. Hyperlinks to all of the detailed pieces of guidance available on these web pages are provided in Appendix C.

**Table 2.3 Guidance Available from Other Government Departments**

Guidance/Tools	Relevance to Action Planning
<b>Department for Transport (DfT)</b>	
<a href="http://www.dft.gov.uk/pgr/regional/">http://www.dft.gov.uk/pgr/regional/</a>	The website contains links to guidance produced by DfT in relation to Local Transport Plans, sustainable transport schemes, vehicle restricted areas, parking controls, traffic control systems, park and ride schemes, smarter travel choices, speed limits and guidance available to local authorities regarding obtaining grants for sustainable transport measures.
<b>Highways Agency (HA) – Executive Agency of DfT</b>	
Highways Agency 2005. The Role of the Highways Agency in Local Air Quality Management. January 2005	Introduces the Highways Agency and sets out its responsibilities as well as providing contacts for Local Authorities in relation to LAQM. Describes how the HA can become involved in LAQM and indications of how emissions can be affected by proposals.
Tackling Congestion by Influencing Travel Behaviour <a href="http://www.highways.gov.uk/knowledge/9575.aspx">http://www.highways.gov.uk/knowledge/9575.aspx</a>	Webpage providing links and information to guidance related to encouraging people to make smarter choices in their travel options as part of the Influencing travel behaviour programme. This includes guidance and information on developing travel plans and stakeholder engagement.
<a href="mailto:ha_info@highways.gsi.gov.uk">ha_info@highways.gsi.gov.uk</a>	Contact email for both setting up contact and for more detailed discussions with the Highways Air quality specialist.
08459 5565 75	Contact telephone number for both setting up contact and for more detailed discussions with the Highways Air quality specialist.
<b>Environment Agency (EA)</b>	
<a href="http://www.environment-agency.gov.uk">www.environment-agency.gov.uk</a>	The website contains a large amount of information concerning air quality and the regulation of emissions from industrial processes. Where an industrial process is contributing to an AQMA the Environment Agency could become involved through its permitting requirements.
<a href="mailto:enquiries@environment-agency.gov.uk">enquiries@environment-agency.gov.uk</a>	Contact email for information, data, advice and consultation.
08708 506 506	Contact telephone number for information, data, advice and consultation.
<b>Homes and Communities Agency (HCA)</b>	
<a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/">http://www.communities.gov.uk/planningandbuilding/planningsystem/</a>	Provides information and guidance in relation to the planning system in the UK and those policies relating to air quality in the context of planning and giving planning permission for developments. Also provides guidance should an AQAP require assessment under the SEA Directive. The information on this website is likely to alter within the next 12 months as planning policy in the UK is altered.



**Table 2.3 (continued) Guidance Available from Other Government Departments**

Guidance/Tools	Relevance to Action Planning
<p>Planning Policy Statement 23 (PPS 23): Planning and Pollution Control</p>	<p>PPS 23 (2004) sets out the Government's policy on pollution. The planning system controls the development and use of land in the public interest. It plays an important role in determining the location of development which may give rise to pollution, either directly or from traffic generated, and in ensuring that other developments are, as far as possible, not affected by major existing, or potential sources of pollution. Any consideration of the quality of land, air or water and potential impacts arising from development, possibly leading to an impact on health, is capable of being a material planning consideration, in so far as it arises or may arise from any land use.</p>
<p>Planning Policy Statement 13 (PPS 13): Transport</p>	<p>PPS 13 sets out the Government's policy on transport. An assessment to accompany a planning application should have regard to effective road traffic management to reduce congestion, ease pedestrian and cyclist movement and improve air quality.</p>
<p>Planning portal website (<a href="http://www.planning.gov.uk">www.planning.gov.uk</a>)</p>	<p>This website is run by the UK government to provide guidance and information regarding the planning process. As well as information for developers there is also information for Local Authorities with regards to planning policies and applications.</p>
<p><b>Department for Health - COMEAP</b></p>	
<p>Statements, Reports and Advice. Annual reports of the committee</p>	<p>The Committee on the Medical Effects of Air Pollutants provides reports to the Department of Health regarding the potential toxicity and effects on health of air pollutants. These are made available on their website and cover a range of pollutants.</p>



## 3. Consultees' General Views on the Action Planning Process

### 3.1 General views

This section presents the Consultees' general views on each stage of the Action Planning process within the Local Air Quality Management regime. The views presented are those provided by the Consultees' themselves and have not been edited when added to this report. A summary is presented in the following section.

**Table 3.1 General Views on the Action Planning Process**

Action Plan Phase	Comments
Identification of Emission Sources and Contribution towards Exceedences	<p>Where an AQMA is declared for an industrial reason, the site is regulated by EA. Therefore Council has no means of implementing any measures to improve air quality and must rely on EA.</p> <p>It's still confusing where the AQOs actually apply – AQOs and Limit Values are different.</p>
Consideration of Emission Reduction Options / Action Plan Measures	<p>Availability of best practice measures is often quoted as being the most useful to Local authorities with some using existing AQAP sited as best practice as a template for their own AQAP.</p> <p>Guidance provides a framework for developing actions to address air quality problems.</p> <p>Stakeholders considered national developments such as emission limits and large combustion plant directive and planning laws influential in reducing emissions associated with air quality.</p> <p>Guidance and measures included in it need to be considered in AQAPs as a requirement. Local authorities seem to include all measures just to allow that box to be ticked when AQAP is assessed by Defra's consultants.</p> <p>It's limited what individual local authorities can do, although more could be done jointly.</p> <p>Push the focus towards non-threshold pollutants – measures should be applied nationally.</p> <p>No single measure will work universally, but there are different measures that will work for different types of area / road.</p> <p>Link road measures to air quality / carbon / health / safety – incentivise other drivers to also improve air quality.</p>
Economic Evaluation of Options	<p>Economic Guidance was only known by a handful of consultees both local authorities and other stakeholders. Of those who knew this guidance existed most had not used it or thought it was overly complicated and difficult to use. More stakeholders were aware of this guidance than local authorities.</p> <p>Local authorities mentioned undertaking a cost benefit analysis of the measures in the Action Plans.</p> <p>Make links to health benefits in LAQM.</p> <p>Are there better ways of assessing broader health benefits from an economic perspective?</p> <p>At this stage, should the responsibility of Action Plan pass to the Transport dept.</p>



**Table 3.1 (continued) General Views on the Action Planning Process**

Action Plan Phase	Comments
Implementation of Measures	All Action Plans are similar – the high-cost options are not implemented.
Collaborative Working and Consultation	<p>Consideration of air quality in Local Transport Plans has got transport planners and air quality professionals to speak with each other and try to find common ground; this has proved successful in some cases. More difficult with two tier authority where air quality is with local and transport is with county.</p> <p>Cluster groups do work well and Defra guidance needs to recognise this.</p> <p>Lack of communication between air quality and transport colleagues.</p>
Impact Assessment - Quantification of Expected Impacts of Measures	Modelling is difficult in areas where sources of pollutant are unlikely to all be located in the Borough – no control over these sources especially freight routes.
Monitoring and Evaluating Effectiveness of Action Plan	<p>All of consultees said this was very difficult to achieve. On paper emissions appear to be falling but there appears to be no noticeable improvement in monitored air quality concentrations.</p> <p>Consultees do take steps to assess the effectiveness of the measures which they have undertaken but difficult to show a real improvement in concentrations. Steps taken include monitoring, modelling and assessing the uptake of initiatives such as car sharing and modal shift.</p> <p>Monitoring for assessing measures may not be as successful, as monitoring could be in place in wrong areas where measures actually have effects. Moving monitoring means takes a lot longer to identify trends and whether measures are effective.</p> <p>Easier to assess the effectiveness of measures on CO<sub>2</sub> emissions than air quality emissions, appears to be more information available for CO<sub>2</sub> as well as toolkits to actually measure emissions.</p> <p>Councils should lead by example – clean up their own fleets.</p> <p>More focus on measuring black carbon and PM<sub>2.5</sub> as indicators of primary road traffic emissions.</p> <p>Need an established list of proxies to assess effectiveness of measures.</p>
Annual Action Planning Progress Reports	n/a
Updating Action Plans	<p>A lot of local authorities have an AQAP which has been in place for a number of years and are looking to update their AQAP, available guidance doesn't seem relevant for this.</p> <p>Process of revising an Action Plan can be politically long-winded. Perhaps Action Plans should be less prescriptive and have fewer actions under broad headings.</p> <p>Many Action Plans are out of date.</p>



**Table 3.1 (continued) General Views on the Action Planning Process**

Action Plan Phase	Comments
General Comments / Accessibility of Guidance / Usefulness	<p>LAQM TG(09) is quoted as the most useful piece of guidance which local authorities refer to. Not many mentioned the actual guidance in relation to action planning. When this was mentioned it was sited as being very old in terms of ideas for measures and their implementation.</p> <p>London Borough's often relate to the Mayor's Air Quality Strategy rather than just the Defra Guidance.</p> <p>Often limited political support for an AQMA / Action Plan. Political intervention can water-down the actions.</p> <p>Several parties reported that there was a lot of good information and guidance out there, but it was dispersed. Defra's website includes much of the guidance but it's hard to find.</p> <p>Tools / guidance too complicated, especially if Environmental Health Departments are downsizing.</p> <p>Good practice may not be well communicated. There are likely to a number of action plans that contain good innovative measures, but the overall action plan may not be seen as a best-practice example.</p> <p>Defra / DfT could have joint guidance – transport is the primary issue.</p> <p>The Practice Guidance is too detailed.</p>

## 3.2 Summary of General Views

The Consultees' general views of the Action Planning Process are summarised in the following points:

- The process of preparing an Action Plan is considered by the Consultees' to be a worthwhile exercise, as it maintains the profile of air quality within the local authority;
- National strategies have had the most effect on improving air quality in England;
- The guidance available mainly relates to writing the Action Plan and less about how to implement and evaluate the effects of the measures on air quality;
- Certain specific measures within an Action Plan could be considered as good practice but the overall Action Plan itself is not considered as a best practice example of an Action Plan;
- The Practice Guidance available at present is too detailed for most local authorities to be able to use effectively;
- There is a general lack of awareness of the guidance available to local authorities, especially the range of best practice examples;
- Greater linkages between other government departments (DfT, Defra, HA and EA) would assist local authorities in implementing effective measures;



- Planning policy and guidance has proved useful for ensuring new developments consider air quality and implement measures to mitigate against potentially adverse air quality effects; and
- Action Planning Guidance is perhaps less relevant to those local authorities who are looking to update/revise their Action Plans, rather than develop one for the first time.



## 4. Consultees' Identification of Shortcomings in the Guidance

### 4.1 Shortcomings Identified

This section is concerned with the shortcomings identified by consultees of where the guidance may be lacking in allowing local authorities to be able to improve air quality within their AQMAs. Table 4.1 identifies the consultee's views at each stage of the Action Planning Process. The views presented are those provided by the consultees themselves and have not been edited when added to this report. A summary of these views is presented in the following section.

**Table 4.1 Identification of Shortcomings of the Available Guidance**

Action Plan Phase	Comments
Identification of Emission Sources and Contribution towards Exceedences	<p>Use of guidance depends on the extent of air quality issues and whether the local authority has large amount of time and resources.</p> <p>Diesel vehicles seem to have most effect on air quality in urban areas, but no measures to tackle this. Euro Emission Standards which should have resulted in improvements don't seem to be materialising.</p> <p>AQMAs are declared following consultation with public and stakeholders. Size of AQMA may not relate to actual air quality issue and may be influenced by political decisions and funding. Does this provide the correct framework for tackling air quality issues?</p>
Consideration of Emission Reduction Options / Action Plan Measures	<p>There is limited knowledge shared about which measures work and which don't – there's not enough detailed air quality monitoring.</p> <p>No mention of those measures which haven't been successful in order for other local authorities not to make same mistake.</p> <p>Nothing in the guidance relating to the synergy between air quality improvements and climate change or those climate change improvement measures which could have a negative effect on air quality. Need to consider links with planning – this has been successful in considering effects of road transport associated with new developments, where it is now considered the norm to undertake air quality assessment to accompany planning application.</p> <p>Measures taken are either confined to hotspots and could involve moving the problem elsewhere or requiring a modal shift across a larger area. The modal shift often requires a large amount of public backing and also working with other stakeholders such as bus companies and Local Transport Planners.</p> <p>A number of local authorities worked with bus companies to improve air quality in city centres. Involved banning private vehicles and asking bus operators to improve their fleet (Euro III, IV or V vehicles only). Although more people use buses, buses themselves contributing to air quality issues and not seeing decreases in emissions and concentrations as expected.</p>



**Table 4.1 (continued) Identification of Shortcomings of the Available Guidance**

Action Plan Phase	Comments
Consideration of Emission Reduction Options / Action Plan Measures (continued)	<p>Only really effective way of improving air quality is to reduce the number of vehicles on the roads. No clear measures about how to do this.</p> <p>Measures in AQAP are aspirational and not realistic.</p> <p>Guidance is used to provide a structure for AQAP rather than to actually develop measures which could improve air quality specifically for an area.</p> <p>LES guidance relates to electric vehicle charging points but these generally only used by private vehicles and can't force developers to place these on developments. Having charging points is just a tick box exercise.</p> <p>Guidance in terms of measures to consider is quite old in relation to some of the more recent measures, tools, ideas and technology which is now available.</p>
Economic Evaluation of Options	<p>Measures may not take into account effect on local business which for some boroughs would be considered as more important, even if air quality would be significantly improved.</p> <p>Economic guidance is not a useful tool in persuading local politicians to consider air quality measures. Better guidance could help make the case for investment at a local level.</p> <p>Guidance itself is at extremes; economic guidance is very involved whereas other guidance is not very detailed – need proportionality.</p> <p>The Environmental Audit Commission's report under-estimates benefits.</p>
Implementation of Measures	<p>Euro guidance relating to LEZ shows different standards for each country and sometimes city or Europe-wide; same standards are easier to implement – simplification.</p> <p>Measures are often unpopular with councillors and politicians, hence the use of Section 106 agreements. Options to limit vehicle movements are unpopular.</p> <p>LEZ implementation is expensive and costly to run. Only applicable to those areas where people trying to get to centre not for those authorities where problem is through traffic.</p>
Collaborative Working and Consultation	<p>Guidance relates purely to air quality but most local authorities affected by road transport which is related to County Council, Highways Agency and DfT, therefore local authorities have no control and must engage with other bodies whose budgets are not for air quality and therefore need to find synergies. DfT and HA not involved in improving air quality and take no ownership in helping to improve air quality. HA is concerned with safety, congestion and journey time reliability and this is where their budget is generally spent.</p> <p>Need to further consider public's engagement with air quality issues.</p>
Impact Assessment - Quantification of Expected Impacts of Measures	n/a
Monitoring and Evaluating Effectiveness of Action Plan	<p>Guidance relates to building an AQAP and assessing each year how a local authority is doing against AQAP and not necessarily whether air quality is improving or not. It seems to just assess whether a measure has been implemented and not relate to whether the measure is successful or not. Budget therefore seems to be spent on identifying issues and measures and not on their actual implementation and assessing their effectiveness. Implementation of the measures is just a tick box exercise. Actual assessment of the magnitude of effects of the measures is difficult – a lot of local authorities removing monitoring due to budget constraints.</p> <p>Guidance does not contain any measures for assessing the effectiveness of measures already undertaken. Very good at identifying issues but not so good at solving them.</p> <p>No common criteria for the assessment of measures taken.</p>
Annual Action Planning Progress Reports	n/a
Updating Action Plans	Most local authorities are looking to update their AQAPs and find that the current guidance isn't very relevant for this.





**Table 4.1 (continued) Identification of Shortcomings of the Available Guidance**

Action Plan Phase	Comments
General Comments / Accessibility of Guidance / Usefulness	<p>The Action Plan guidance is too long.</p> <p>Guidance available seems to be in several places rather than as one document like the LAQM TG (09) document.</p> <p>Most of information coming from government departments relate to reducing greenhouse gas emissions – is air quality considered a part of this? Is air quality with statutory limits more important? At present developments including reduction in CO<sub>2</sub> emissions which could result in higher air quality emissions are allowed due to the perceived importance of CO<sub>2</sub> as compared to air quality.</p> <p>Use of Section 106 agreements is affected by how close development is to AQMA.</p> <p>Previous LTP guidance included air quality as a main consideration. In the latest guidance air quality is now within a range of considerations all grouped together under Health issues.</p> <p>Concern that there is too much guidance including air quality guidance, which is related to the same sources such as road transport and emission from buildings but at present no consideration of the overlaps such as transport policy and climate change.</p> <p>No statutory requirement for local authorities to achieve AQOs – this is national statutory level therefore difficult to secure funding at local level.</p> <p>Guidance takes a top-down approach.</p>

## 4.2 Summary of Consultees’ Identification of Shortcomings

The shortcomings in the guidance identified by the Consultees’ are summarised in the following points:

- Problems with the AQAP and AQMA becoming political as they both have to be agreed by councillors. Air quality issues may also therefore have to fit in with other priorities of the local authority such as economic growth. Therefore the measures which may have the most effect on improving air quality in an area, such as restrictions on traffic entering an area, are not implemented;
- Climate change is considered to be a big issue for most local authorities but there appears to be no guidance relating to the synergies and conflicts between climate change and air quality<sup>3</sup>;
- For those local authorities who are undertaking a review of their Action Plans, the guidance available does not appear to give any steer as to how this is approached, as opposed to the guidance available to beginning a new Action Plan for the first time;
- At present there does not appear to be any guidance relating to how to assess the effectiveness of measures implemented to improve air quality; and

<sup>3</sup> During the course of this study EPUK produced a guidance document relating Air Quality and Climate Change. The reference to this guidance document is given in both Table 3.2 and Appendix C.



- Road transport is the main cause of air quality problems in the AQMAs declared in the UK. Local authorities feel that there is limited linkage between local transport planning and improvements in air quality.



## 5. Consultees' Recommendations for Improvements

### 5.1 Recommendations Identified

This section provides a summary of improvements identified by Consultees' to the existing guidance which they feel could assist them and local authorities with identifying measures for improving air quality and the monitoring of progress towards the ongoing achievement of the relevant AQOs. Table 5.1 identifies the Consultees' views at each stage of the Action Planning Process. The views presented are those provided by the consultees themselves and have not been edited when added to this report. A summary of these views is presented in the following section.

**Table 5.1 Recommendations for Improvements to the Guidance**

Action Plan Phase	Comments
Identification of Emission Sources and Contribution towards Exceedences	<p>If declaring an AQMA should know why declaring and what needs to be done. Is a Further Assessment necessary?</p> <p>Main problem for most Local authorities is HGV emissions – may need national guidance for this rather than addressing at local level where there is very little influence.</p> <p>National strategy to move freight from road to rail would help.</p> <p>Integrate air quality with Sustainable Transport Planning</p>
Consideration of Emission Reduction Options / Action Plan Measures	<p>List of measures which should be implemented as a minimum when declaring an AQAP, these could be statutory measures which allow reductions in emissions across the councils area.</p> <p>Need to have a consideration of the policy and political options available in implementing air quality measures.</p> <p>Should there be an equivalent LAQM TG (09) for Action Planning. This could contain the range of measures available and how effective they are and where they are best suited to be used.</p> <p>Most AQAPs include a range of measures and are often very lengthy. Those AQAPs which have been more successful appear to be those which are much simpler and rely on engaging with all key parties. This works particularly well where there is one source of emissions rather than Borough wide where there are multiple problems – need to consider whether guidance should be signposted depending on a particular problem and the magnitude of this – similar to construction best practice guidance where steered to look at what steps to take depending on size of site.</p> <p>Need to focus on where certain measures can actually be successful</p> <p>It would be good to see examples of bad projects as well as good to learn from others mistakes.</p> <p>An up to date list of measures, how implemented and by whom made available to other local authorities, would be useful to identify what works, how implemented, why it works and allow local authorities to contact each other to discuss.</p>
Economic Evaluation of Options	n/a
Implementation of Measures	Ring fenced funding for air quality to ensure measures are implemented and air quality addressed appropriately.



**Table 5.1 (continued) Recommendations for Improvements to the Guidance**

Action Plan Phase	Comments
Collaborative Working and Consultation	<p>In future likely to find air quality issues need to be conveyed to several sections of the local authority, local councillors and the public to ensure air quality issues are considered. Local authority officers need to ensure they develop relationships with these people.</p> <p>Air quality is a cross boundary issue and local authorities should work together to improve air quality.</p> <p>National level campaign to raise awareness of air quality amongst the public and encourage the uptake of cleaner vehicles.</p> <p>Highways Agency is trying to standardise responses to air quality issues across England to ensure a consistent approach.</p>
Impact Assessment - Quantification of Expected Impacts of Measures	n/a
Monitoring and Evaluating Effectiveness of Action Plan	<p>Use of AURN standards for local monitoring is too expensive and requirement for this should be dropped.</p> <p>Assessment of the effectiveness of measures could be split into effectiveness of measures to reduce concentrations and effectiveness of measures to reduce emissions.</p>
Annual Action Planning Progress Reports	Effective system needs continuous appraisal
Updating Action Plans	n/a
General Comments / Accessibility of Guidance / Usefulness	<p>GIS Tool to highlight air quality hot spots and where there may be creeping air quality levels in areas in order to see visually where issues are located to try and address problems - Could be good tool for public to see issues also.</p> <p>LES group working on the production of a tool for identifying emissions from buildings in new developments – this was highlighted by number of councils as the next area to tackle if improvements were made in emissions from road vehicles.</p> <p>Need to make people aware of the new tools which are being developed by other agencies and ensure these are integrated into the Defra guidance.</p> <p>It would be useful to have a tool which shows easily what effect a measure or package of measures can have on air quality in an area without need for detailed dispersion modelling – cuts costs.</p> <p>Keen to see web based spreadsheets and tools rather than lengthy guidance documents</p> <p>A lot of local authorities, cluster groups and other organisations such as EPUK and the LES group are producing guidance for themselves in areas where they see gaps in the guidance. A large amount of guidance has been developed by stakeholder groups which has then been endorsed by Defra or Mayor of London (GLA)</p> <p>Guidance for Local authorities in relation to air quality should be endorsed by DfT and have it as a joint DfT/Defra publication, should encourage transport planners to consider air quality.</p> <p>All parties should have an understanding of the funding processes available to those wanting to make transport improvements to improve air quality.</p> <p>Concern with introduction of localism that air quality will fall off the agenda, need national driver to ensure air quality considered at local level.</p> <p>How will local authorities be responsible for fines from EU? Will this assist with improving air quality?</p> <p>Air Quality website should have links to best practice guidance.</p> <p>Need something to fill the gap of PPS 23.</p> <p>Viral messages with information about: who to form relationships with; de-centralisation; information on CHPs; dispersion modelling; EPUK guidance; emission tools; and Cost Vs Mitigation and effectiveness (low –high).</p>



## 5.2 Summary of Consultees' Recommendations for Improvements to the Guidance

The improvements to the guidance recommended by the Consultees' are summarised in the following points:

- Consultees' would like to see simple tools for assessing which measures or which range of measures would be useful for improving air quality in an area and whether this would affect air quality in other locations as a result of implementing these measures, this could incorporate a GIS function in the tool;
- A large proportion of the AQMAs are as the result of pollution from road traffic. If DfT were to endorse Defra guidance in relation to air quality it could assist with the raising of awareness of air quality issues amongst transport planners;
- More examples of best practice implementation of measures which have been found to actually improve air quality in area with links to the local authorities who implemented these measures to provide guidance for other local authorities looking to implement similar measures;
- Measures and guidance available should be easy to find on the Defra website with alerts for updates provided via email messages to those local authorities and stakeholders who requested updates;
- Guidance on how to form working relationships with other departments where there are air quality overlaps; and
- When the planning policy for England is agreed in its new form the effects of this on Air Quality Action Planning will need to be disseminated to local authorities and if there are significant changes new guidance may be required.



## 6. Discussion

This section presents a discussion of the key findings of this study, based on the views of those that participated in the telephone surveys.

### 6.1 Overview of the Action Plan Process

Based on the comments received from stakeholders contacted as part of this study, the general process of identifying areas of poor air quality and undertaking the necessary steps towards developing an Action Plan is considered to be taking place in line with government guidance.

The LAQM process is seen by stakeholders as effective at identifying locations which have, or could potentially have, issues with air quality, but it appears that the Action Planning process is less effective at delivering actual improvements in air quality itself. This is despite the process of Action Planning being undertaken in line with the guidance and with local authorities including best-practice measures in their AQAPs. This is especially highlighted where local authorities and other stakeholders have described incidences where local authorities have developed an Action Plan and implemented measures successfully which, based on the modelling to accompany the Detailed/Further Assessment, should have measurable benefits in terms of air quality. However the monitoring of actual pollutant concentrations in those areas where these measures are implemented have shown little change. This trend has also been observed by monitoring data across the UK and is confirmed in several reports looking at the trends in pollutant concentrations across the UK in the last few years<sup>1</sup>.

When asked whether local authorities had used the economic practice guidance in relation to preparing their Action Plans, it was generally indicated that the guidance was not widely used. Those which were aware of the guidance felt it was over complicated and where measures related to transport planning the guidance was not particularly useful. It was felt that transport planners would use their own economic guidance to assess whether measures which affected transport would be implemented. Most local authorities did however mention undertaking some form of cost-benefit analysis when assessing measures in their Action Plans, although this was perhaps not as detailed as specified in the latest guidance.

As local authorities are tasked under the LAQM Regulations of working towards the AQOs rather than meeting them, the view of the consultees' was that, air quality is not given the prominence in local decision making that it would if there was more of an incentive for local authority's to meet the AQOs. Where the implementation of an air quality measure may adversely affect a local authority's economic agenda or climate change initiatives, it was felt by the consultees that air quality was the area which had to give way. The current planning guidance is an area where local authorities felt air quality had been considered at all levels and was taken into account by developers.

As mentioned by most stakeholders contacted as part of this study, climate change was considered to be an area where additional benefits for air quality could be achieved, through synergies between these two areas. Concerns



were raised that climate change was higher on the agenda than air quality issues, and measures which reduce greenhouse gas emissions but could increase local emissions of air quality pollutants were more likely to be implemented due to the greater awareness of climate change issues and its prominence amongst councillors and members of the public. There are examples of local authorities that have implemented a range of measures at a local level to reduce greenhouse gas emissions. Some of the “softer” measures for improving air quality, including those relating to reductions in car use, could also assist with reducing greenhouse gas emissions; this suggests there could be synergies between these two initiatives.

At present only those local authorities that have declared AQMAs need to consider implementing measures to reduce concentrations and emissions of air quality pollutants. All local authorities are invited to prepare an air quality strategy to tackle air quality in their areas, although for those local authorities who do not have any air quality issues, in terms of meeting the AQOs, the development of an Air Quality Strategy may seem less of a priority. Views expressed by the consultees included that national measures to reduce pollutant emissions had delivered the most improvement in air quality in recent years. This then led to the view that perhaps there should be national input to improve local air quality by the use of a standard set of “softer” measures which could be implemented by all local authorities, not just those that have declared an AQMA. These could include measures such as no engine idling outside schools and awareness campaigns to reduce car use amongst the general public. This would be particularly useful in enabling reductions in those pollutants where there is no threshold for health effects, such as PM<sub>2.5</sub>. Overall take-up of measures could be driven through raising awareness of the effect of pollutants on human health and informing the public about the role they could play in reducing emissions and improving public health.

## 6.2 Consultees’ Identification of Shortcomings and Gaps and Recommendations for Further Guidance and Tools

Based on the mapping exercise and the views of the stakeholders consulted, there does not necessarily appear to be the need for any new procedural guidance in relation to Action Planning. Instead it appears that local authorities require more of a steer in terms of what measures are available and how to implement them in the most effective way. In addition it was felt that the process of Action Planning and the annual reviews maintained the profile of air quality within the local authority and ensured that it was a continuous process.

For those Local Authorities that were updating their AQAPs rather than developing new plans, it was viewed that there could perhaps be some further guidance relating to their specific needs. Existing AQAPs would contain measures that have been implemented and local authorities will want to build on this work rather than beginning a fresh approach to AQAPs, but still incorporate new ideas, technologies and experiences from others.

From Entec’s own experience of conducting the mapping exercise, a wide range of guidance, tools and information is available to local authorities who are preparing an AQAP or who are looking to revise their existing plan. The difficulty appears to be identifying the location of this guidance and information on the various departmental websites for Defra, DfT, HA and the HCA, as well identifying updates to guidance from other organisations. The



Defra website has recently undergone a number of changes and local authorities are at present not yet familiar with navigating their way through the website.

Several local authorities would like to see a simple spreadsheet based tool which allows measures or a range of measures to be chosen for an area, which details the likely range of benefits in terms of pollutant concentrations. At present, local authorities have stated that they are concerned that with budget cuts affecting their monitoring regimes, assessment of the effectiveness of measures would result in the requirement for more detailed dispersion modelling, which in itself would be expensive. At present there are several simple tools for assessing CO<sub>2</sub> emissions and the effect of measures; perhaps these could be adapted for air quality pollutants. A range of these tools for calculating CO<sub>2</sub> emissions is available on the environmental toolkit website (Appendix C).

Several local authorities and the LES Partnership have mentioned that they are undertaking work on developing a tool for assessing the effects of building design on air quality pollutants. Information such as this should be captured by Defra and made available on its website to ensure all local authorities have access and can be kept up to date with developments. This could take the form of a bulletin board where other organisations can report on what they are also working on in relation to developing tools and guidance for air quality Action Planning, and what works best in practice. This will also ensure local authorities and stakeholders who could contribute can also get in touch with these organisations. Local Government Regulation has recently established a similar type of service.

Most local authorities were keen to see best-practice examples of measures which had been implemented and been considered as successful. At present, best-practice examples available are mainly based on the AQAP report itself, rather than measures from a number of Action Plans. These best-practice examples could focus on how implementation of the measure was undertaken and why it was considered successful, to give a steer to other local authorities considering similar measures. This could also provide details of those measures which had been found to be unsuccessful and why, to give information to local authorities on whether this would be an appropriate measure for them to consider.

To assist with providing examples of best-practice guidance, a forum could be set up on Defra's website for Local authorities to be able to post questions to both the helpdesk and other local authorities when considering particular issues they may have, as other local authorities may have experience of tackling similar issues and could provide advice. Up until now, perhaps the advice provided by Defra's LAQM Helpdesk has not been widely publicised, with the exception of example Action Plans and some FAQs. There are of course technical difficulties associated with setting up a forum on the Defra website as described above, these include: the need for resources to manage the forum posts; presentational issues as the forum would be hosted on Defra's website but would not actually present the views of Defra; and, to ensure all environmental topics are considered on the Defra website a template format has been agreed which could restrict the options available when setting up a forum just for air quality action planning.

From conducting the survey it was found that there may be insufficient communication between officers in local authorities concerned with air quality and those concerned with transport planning. From the review of the





available guidance as part of the mapping exercise, it has been identified that much of this guidance available to local authority air quality officers and transport planners demonstrates where synergies in sustainable transport planning and air quality could be achieved. Air Quality officers in local authorities need to be aware that this guidance exists and they can work with local transport planners using this guidance to try and improve air quality. This may require DfT and the HA endorsing Air Quality Action Planning guidance and Defra endorsing sustainable transport guidance to assist with raising awareness between these two groups.

A number of stakeholders felt that improvements in air quality within areas had been brought about by the greater cooperation between planning departments and air quality officers as a result of several policy and guidance documents related to air quality and planning such as PPG 23 which was replaced by PPS 23 and LAQM TG (09). It is now considered to be the norm for an air quality assessment to accompany a planning application for a new development. As these measures have been considered as successful, as have the relationships built between local air quality officers and planning officers, there is a concern that the changes to the planning system may alter how the planning system is utilised to ensure air quality effects of new developments are mitigated. At present, views are being sought by the Planning Minister as to what priorities and policies should be included within the new National Policy Frameworks to provide a shorter, more decentralised and less bureaucratic National Planning Policy Framework. It is unclear at this stage what form the Planning Policy Framework will take and how, if at all, this will affect air quality considerations within planning. Until further information is available it is unclear whether further guidance will be required.



## 7. Summary and Recommendations

This section provides a summary of the issues raised through the informal survey and provides consolidated recommendations with regards to the next steps to take with regards to Action Planning.

### 7.1 Summary

The Action Planning process itself is currently viewed as working effectively, although it is not resulting in the reductions in concentrations of air quality pollutants at monitoring locations.

Local authorities would like more advice and examples regarding implementation of measures which could actually improve air quality in their areas. At present the review of the process appears to be more concerned with reviewing whether measures have been considered and implemented rather than assessing their effectiveness.

There is a large amount of guidance available to local authorities both from Defra, organisations interested in air quality and other government departments where they overlap with air quality. In its current form this guidance can be difficult to find. It is recommended that Defra's website is altered so as to allow this guidance to be easily found and to ensure it is updated regularly with examples of best-practice and updated when new guidance and tools are being developed and become available.

Good relationships have been formed between air quality officers and planning officers in relation to air quality effects of new developments. Views are currently being sought with regard to the priorities and policies within the new proposed National Planning Policy Framework. At this time it is unclear what effect if any this will have on the consideration of air quality within planning applications, if any. Until further information is available it is unclear whether further guidance will be required.

### 7.2 Key Recommendations

The Action Plan process itself is not considered to require any alteration. This report includes recommendations in terms of how the available guidance, information and tools could be better disseminated to local authorities as well as the format local authorities would like to see the guidance to allow ease of use. The key recommendations are:

- Guidance should be made available for those local authorities undertaking a review of their AQAP. This should assess what has already been achieved, which measures should be continued and whether there are additional measures which can be implemented. This could be in the form of a focused standardised report;
- Provide a "list" of the current guidance available to local authorities. This should not separate guidance and best-practice measures as is presently done on Defra's website as this gives the impression that this is the only guidance in relation to Action Planning. This "list" will need to be



updated regularly with perhaps a system for local authorities and other interested parties able to register to receive an email when an update is released;

- Development of a spreadsheet based tool (or other simple media) which would allow local authorities to test a range of measures and their potential effects on emissions and air quality;
- The Defra website could host a forum page allowing local authorities to comment on measures and discuss Action Planning ideas with each other. This could also form part of the community forum being developed by the Office of Local Government Regulation;
- Local Authorities prefer to use best-practice examples when looking for ideas for measures to include within their Action Plans, especially where a measure has been effective elsewhere, in improving air quality. These examples will need to be easily accessible and updated regularly to show the use and effectiveness of new measures;
- More guidance is required by local authorities relating to assessing the actual effectiveness of measures which have been implemented. This will ensure only those measures which are relevant to a local authority are included within an Action Plan rather than listing all measures which are available. This will place less emphasis on the preparation of the Action Plan report and more on the actual implementation and monitoring of appropriate measures in the Action Plan;
- Development of a set of “softer” measures which could be used by all local authorities to improve air quality nationally. These measures could also form part of the measures to reduce emissions of greenhouse gases related to transport;
- Endorsement by DfT and HA, other government departments and other executive agencies, which have an interest in air quality, of the Air Quality Action Planning guidance, to ensure transport planners take into account air quality when planning road schemes, and either new or amendments to existing roads;
- Guidance relating to the synergies and conflicts between air quality and climate change is required by local authorities. EPUK has produced guidance relating to this and local authorities need to be made aware of the guidance; and
- Guidance for local authorities in order to raise awareness of air quality amongst members of the public and local councillors in relation to air quality and its synergies with planning, transport, climate change and its effects on health of local residents.



## Appendix A List of Consultees'

Those consultees highlighted in green have not responded to requests to take part in the study.

- Department for Transport (DfT)
- Highways Agency (HA)
- Greater London Authority (GLA)
- Transport for London (TfL)
- **London Councils**
- Environment Agency (EA)
- Institute of Air Quality Management (IAQM)
- Environmental Protection UK (EPUK)
- **Local Government Regulation (formerly LACORS)**
- Air Quality Consultants (AQC)
- **University of West of England (UWE)**
- AEA
- Bureau Veritas (BV)
- Low Emissions Strategy Partnership
- TTR Ltd
- Newcastle City Council
- London Borough of Hillingdon
- Manchester City Council
- Salford City Council
- Lancaster City Council



- Nottingham City Council
- Brighton and Hove District Council
- Oxford City Council
- London Borough of Camden
- London Borough of Wandsworth
- Derbyshire District Council
- Dover District Council
- Leeds Metropolitan Council
- Sefton District Council
- Birmingham City Council
- Portsmouth City Council
- Sheffield City Council
- Bradford City Council
- Mid Devon District Council
- Oldham Metropolitan Council
- Tameside District Council
- Suffolk Coastal District Council



# Appendix B

## Pro-forma Questionnaires



**SURVEY ON GUIDANCE FOR LOCAL AUTHORITIES TO ASSIST IN IMPROVING  
LOCAL AIR QUALITY**

**Local Authority:**

**Contact:**

**Description of Council:** urban / metropolitan / predominantly rural

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***1) What air quality problems have been identified in your LA area?***

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***2) What measures have been taken to address these problems?***

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***3) What guidance/tools (not just Defra guidance) did you use to help in identifying measures to improve air quality?***

---

***4) If other than Defra guidance used, why did you choose other guidance?***

---

**5) Did you implement or follow any of the measures/actions recommended by the guidance?**

---

**6) (if not mentioned) Are you aware of the Defra practice guidance? Have you used it to develop measures to improve air quality?**

---

**7) Do you have any suggestions for improvements to the guidance ?**

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**8) Do you have any suggestions for additional guidance or tools to help you or other LAs with measures to improve air quality?**



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**9) Have you been able to assess the effectiveness of measures taken in your LA area to improve air quality?**

***if Yes, how did you do this?***

---

**10) Did you use the Defra guidance on the economic principles for assessment of local measures to improve air quality?**

***If so, how useful did you find it?***

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**11) Is there a “best practice” example you would like to share with other LAs ?**

---

**12) Do you have any other comments?**

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**13) Are you aware of other guidance that LAs could use to support the process of Action Planning? Are you aware of guidance published in other EU member states that could be useful to UK LAs?**

---

**SURVEY ON GUIDANCE FOR LOCAL AUTHORITIES TO ASSIST IN IMPROVING  
LOCAL AIR QUALITY**

**Organisation:**

**Contact:**

**Further information:**

---

***1) What is your association with Local Air Quality Management?***

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***2) What measures do you consider have been the most successful in addressing local air quality problems?***

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***3) What guidance/tools (not just Defra guidance) do you consider that Local Authorities find most useful in identifying measures to improve air quality?***

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***4) What guidance/tools (not just Defra guidance) do you consider that Local Authorities find least useful in identifying measures to improve air quality?***

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**5) Do you think that local authorities implement or follow any of the measures/actions recommended by the guidance?**

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**6) What are your views on the effectiveness of the Defra practice guidance? Have you experienced local authorities using this guidance to develop measures to improve air quality?**

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**7) Do you have any suggestions for improvements to the guidance?**

---

**8) Do you have any suggestions for additional guidance or tools to help local authorities with measures to improve air quality?**

---

**9) Do you consider that local authorities have been able to adequately assess / evaluate the effectiveness of measures taken in their areas to improve air quality?**

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**10) Have you used the Defra guidance on the economic principles for assessment of local measures to improve air quality (If so, how useful did you find it)? Are you aware if it is widely used by local authorities?**

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**11) Is there a “best practice” example of an Action Plan or a measure to improve air quality that you would like to share?**

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**12) Do you have any other comments about Action Planning or the broader role of the LAQM?**

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**13) Are you aware of other guidance that LAs could use to support the process of Action Planning? Are you aware of guidance published in other EU member states that could be useful to UK LAs?**

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## Appendix C List of Hyperlinks to Guidance and Tools currently available



Organisation	Guidance / webpage / tool	Hyperlink
Defra	Practice Guidance Documents  ( <a href="http://www.defra.gov.uk/environment/quality/air/air-quality/laqm/guidance/policy/">http://www.defra.gov.uk/environment/quality/air/air-quality/laqm/guidance/policy/</a> )	
Defra	Local Air Quality Management Webpage	<a href="http://laqm.defra.gov.uk/">http://laqm.defra.gov.uk/</a>
Defra	LAQM Helpdesk - This is a link to the webpage containing the phone number and email address of the helpdesk run on behalf of Defra.	<a href="#">Helpdesk</a>
Defra	Frequently asked questions – these are categorized under the following headings, which link to a webpage containing questions and their answers as pdf documents.	<a href="#">General</a> <a href="#">Review and Assessment</a> <a href="#">AQMA</a> <a href="#">AQAP</a> <ul style="list-style-type: none"> <li><a href="#">General</a></li> <li><a href="#">Contents of Action Plans</a></li> <li><a href="#">Action Plan Measures</a></li> <li><a href="#">Highways Agency</a></li> <li><a href="#">Local Transport Plan</a></li> <li><a href="#">Action Plan Progress Reports</a></li> <li><a href="#">Amendments to Action Plans</a></li> <li><a href="#">Further Assessments</a></li> </ul> <a href="#">Monitoring</a> <a href="#">Modelling</a> <a href="#">Pollutant and Source Specific</a> <a href="#">Air Quality and Planning</a>



Organisation	Guidance / webpage / tool	Hyperlink
Defra	LAQM Review and Assessment Support – this is categorized under the following headings which provide a link to specific webpages.	<a href="#">Report Templates</a> <a href="#">Good Practice Examples</a> <a href="#">Further Assessments</a> <a href="#">Air Quality Action Plans</a> <a href="#">Checklists</a> <a href="#">Guidance for Declaring or revoking an AQMA</a> <a href="#">Examples of Consultation Workshops and Initiatives</a> <a href="#">Workshops</a> <a href="#">Consultation Initiatives</a> <a href="#">Tools</a>
Defra	Action Planning – This has been split into the following headings which provide links to specific pdf documents containing best practice examples and case studies. Also included are links to the DfT website for specific measures in relation to transport.	<a href="#">Good Practice</a> <a href="#">Case Studies</a> <a href="#">Measures</a> <a href="#">Smarter Choices</a> – includes link to Dft website <a href="#">Sustainable Travel Guides</a> <a href="#">Car Sharing and Car Clubs</a> – includes link to DfT website and Car clubs website <a href="#">Travel Plans</a> <a href="#">Measures associated with Buses</a> – includes link to Bus Partnership website <a href="#">Freight</a> – includes link to DfT website <a href="#">Taxis and A best practice guide for reducing emissions from taxis in London</a> <a href="#">Development Planning</a> and <a href="#">Building Sustainable Transport in New Developments</a>  Example of a Supplementary Planning Guidance Document from Liverpool City Council: <a href="http://liverpool.gov.uk/council/strategies-plans-and-policies/environment-and-planning/local-development-framework/local-development-documents/adopted-documents/ensuring-choice-of-travel-sp/">http://liverpool.gov.uk/council/strategies-plans-and-policies/environment-and-planning/local-development-framework/local-development-documents/adopted-documents/ensuring-choice-of-travel-sp/</a>

Organisation	Guidance / webpage / tool	Hyperlink
		<p><a href="#">Urban Traffic Management</a></p> <p><a href="#">Vehicle Parking</a> – includes link to DfT website which has more information on this and tackling congestion.</p> <p><a href="#">Low Emission Zones</a></p> <p><a href="#">Raising Awareness - Education</a></p>
Defra	<p>Policy Interactions – Defra provides the following guidance in relation to policy interactions with other departments. Specific guidance for these departments is provided under the heading Guidance from other Government Departments. A brief description of guidance documents for these departments is given in Table 3.3 in the main report.</p>	<p><a href="#">Development Control</a></p> <p><a href="#">Examples of Supplementary Planning Documents</a></p> <p><a href="#">Examples of air quality policies</a></p> <p><a href="#">Air Quality and Climate Change</a> - Includes link to the Department for Energy and Climate Change</p> <p>Third Report of the Air Quality Expert Group: <a href="#">Air Quality and Climate Change: A UK Perspective</a></p> <p><a href="#">Health</a></p> <p><a href="#">Transport</a></p> <p><a href="#">Industry</a></p> <p>Defra webpages related to emissions of industrial pollutants:  <a href="http://www.defra.gov.uk/environment/quality/air/airquality/lapc/index.htm">http://www.defra.gov.uk/environment/quality/air/airquality/lapc/index.htm</a></p> <p>Defra webpages related to PPC regime: <a href="http://ww2.defra.gov.uk/environment/quality/industrial/">http://ww2.defra.gov.uk/environment/quality/industrial/</a></p>
Environmental Protection UK	<p>These documents can be found on the website for this organization:  <a href="http://www.environmental-protection.org.uk/">http://www.environmental-protection.org.uk/</a></p>	<p><a href="#">Biomass and Air Quality Guidance for Local Authorities</a></p> <p><a href="#">Declaring AQMAs: Turning Reviews into Action</a></p> <p><a href="#">AQMAs: A Review of Procedures and Practices for Local Authorities</a></p> <p><a href="#">Air Quality Action Plans: Interim Guidance for Local Authorities</a></p> <p><a href="#">Air Quality: Planning for Action</a></p> <p><a href="#">Development Control: Planning for Air Quality</a></p> <p><a href="#">Consultation for LAQM: the how to guide</a></p> <p><a href="#">Air Quality and Climate Change</a></p>

Organisation	Guidance / webpage / tool	Hyperlink
London Councils	These documents can be found on the website for this organization: <a href="http://www.londoncouncils.gov.uk">www.londoncouncils.gov.uk</a>	<a href="#">Air Quality and Planning Guidance</a> <a href="#">Control of dust and emissions from construction and demolition</a>
Beacons LES Group	These documents can be found on the website for this organization: <a href="http://www.lowemissionstrategies.org">www.lowemissionstrategies.org</a>	<a href="#">Low Emission Strategies – Using the planning system to reduce transport emissions</a>
University of the West of England, Bristol	These documents can be found on the website for this organization: <a href="http://www.uwe.ac.uk/aqm">www.uwe.ac.uk/aqm</a>	<a href="#">Consultation as Science Communication: The case of Local Air Quality Management</a>
Car Clubs website:	These documents can be found on the website for this organization: <a href="http://www.carplus.org">www.carplus.org</a>	<a href="#">Car Clubs</a>
Travel Plans Websites	(see also DfT website: <a href="http://www.dft.gov.uk">www.dft.gov.uk</a> )	ACT Travelwise website ( <a href="http://www.acttravelwise.org">www.acttravelwise.org</a> ): <a href="#">Travel Plans</a> Sustrans website ( <a href="http://www.sustrans.org.uk">www.sustrans.org.uk</a> ): <a href="#">School Travel Plans</a> Teachernet website ( <a href="http://www.teachernet.gov.uk">www.teachernet.gov.uk</a> ): <a href="#">School Travel Plans</a>
Bus Partnership website:	These documents can be found on the website for this organization ( <a href="http://www.buspartnership.com">www.buspartnership.com</a> ):	<a href="#">Bus Partnership - A toolkit for local transport authorities and operators</a>
Mayor of London:	These documents can be found on the website for this organization ( <a href="http://www.london.gov.uk">www.london.gov.uk</a> ):	<a href="#">London's Air Quality Strategy</a> – sets out a framework for improving air quality in London. The webpage also allows comments to be made on this Strategy.
Greater London Authority (GLA):	These documents can be found on the website for this organization ( <a href="http://www.london.gov.uk">www.london.gov.uk</a> ):	<a href="#">Guidance on Planning Energy Statements</a> – provides guidance for developers on addressing the London Plan's energy heirachy. <a href="#">The control of dust and emissions from construction and demolition: best practice guidance</a>
DFT	DfT webpage related to air quality: <a href="http://www.dft.gov.uk/pgr/regional/tp/guidance/localtransportplans/policies/airquality">http://www.dft.gov.uk/pgr/regional/tp/guidance/localtransportplans/policies/airquality</a>	<a href="#">Guidance on Local Transport Plans</a> <a href="#">Smarter Choices initiative</a> - This report draws on earlier studies of the impact of soft measures, new evidence from the UK and abroad, case study interviews relating to 24 specific initiatives, and the experience of commercial, public and voluntary stakeholders involved in organizing such schemes. Each of the soft factors is analyzed separately, followed by an assessment of their combined potential impact.

Organisation	Guidance / webpage / tool	Hyperlink
		<p><a href="#">Car Sharing and Car Clubs</a></p> <p><a href="#">School Travel Plans</a> – includes links to other organizations involved with car clubs</p> <p><a href="#">Freight Grants</a> - Information and guidance about the Department for Transport grants available to facilitate the purchase of the environmental and social benefits that result from using rail transport instead of road.</p> <p><a href="#">DfT Good Practice Guidance: How to set up and run a Freight Quality Partnership</a></p> <p><a href="#">Freight best practice Guidance</a> - Freight Best Practice is funded by the Department for Transport (DfT) and managed by AECOM to promote operational efficiency within freight operations. Freight Best Practice offers FREE essential information for the freight industry covering topics such as saving fuel, developing skills, equipment and systems, performance management and multi modal.</p> <p>Link on Defra website to Safed website (Safe and efficient Driving): <a href="http://www.safed.org.uk/">http://www.safed.org.uk/</a></p> <p>Most of the information in relation to local parking policy and the operation of enforcement is available from the following section of the DfT website: <a href="http://www.dft.gov.uk/pgr/roads/tpm/tmaportal/tmafeatures/tmapart6/">http://www.dft.gov.uk/pgr/roads/tpm/tmaportal/tmafeatures/tmapart6/</a></p> <p>Information relating to tackling congestion on the DfT website: <a href="http://www.dft.gov.uk/pgr/regional/ltf/guidance/fltp/">http://www.dft.gov.uk/pgr/regional/ltf/guidance/fltp/</a></p>
Highways Agency	Highways Agency webpage related to air quality: <a href="http://www.highways.gov.uk/knowledge/18550.aspx">http://www.highways.gov.uk/knowledge/18550.aspx</a>	<a href="#">The Role of the Highways Agency in Local Air Quality Management</a>
Homes and Communities Agency	<a href="http://www.homesandcommunities.gov.uk">www.homesandcommunities.gov.uk</a>	<p><a href="#">PPS 1</a> (Planning Policy Statement 1)</p> <p><a href="#">PPS 23</a> (Planning Policy Statement 23)</p>
Department for Energy and Climate Change	<a href="http://www.decc.gov.uk/">http://www.decc.gov.uk/</a>	<a href="#">CHP focus website</a> – CHP focus initiative website provide guidance and information for developers on the implementation of CHP plants in the UK
Environment Agency	<a href="http://www.environment-agency.gov.uk">www.environment-agency.gov.uk</a>	<p><a href="#">Air Quality Modelling and Assessment Unit (AQMAU)</a></p> <p><a href="#">Frequently asked questions and other guidance</a></p> <p><a href="#">Data Analysing tools</a></p>
Environmental Tools website	<a href="http://www.environmenttools.co.uk/directory/search">http://www.environmenttools.co.uk/directory/search</a>	