



Leicester
City Council

CABINET (Final Consideration)

4th December 2000

**ENVIRONMENT ACT 1995:
REVIEW AND ASSESSMENT OF AIR QUALITY**

Report of the Director of Environment and Development.

1. Purpose of Report

To inform members of the findings of the statutory Review and Assessment of Air Quality, feedback from consultation, and to request approval for the designation of the consequent, proposed Air Quality Management Areas. The report also seeks approval of SCA-funded capital expenditure.

2. Recommendations

Cabinet is asked to:

- a) Note the findings of the Air Quality Review & Assessment and the proposed Air Quality Management Area detailed in the "Leicester Air Quality Review and Assessment 2000, Final Report", as amended following the consultation process. (Copies supplied).
- b) Note the consultation feedback summarised in Appendix 4 of this report.
- c) Approve the declaration of the Air Quality Management Area, as defined in the Leicester Air Quality Review and Assessment 2000, Final Report.
- d) If considered appropriate, refer this matter for formal ratification at full Council.
- e) Approve capital expenditure of £51,000 in relation to the statutory review & assessment of air quality, funded by Supplementary Credit approval, as detailed in Appendix 6 of this report.

3. Report

The Environment Act 1995 requires all local authorities to undertake a review and assessment of air quality in their areas. The main aim is to identify areas where national air quality objectives (future targets based on health-related standards) will not be achieved. These must be declared as Air Quality Management Areas (AQMAs), and an Action Plan must subsequently be prepared and implemented.

The DETR's "suggested deadlines" for completion are detailed below:

December 2000	Completion of final report after consultation and formal designation of any Air Quality Management Areas (AQMAs)
November 2001 (Within 9-12 months of AQMA designation)	Completion of a more detailed review within AQMAs and preparation of a draft Action Plan for consultation.
May 2002 (Within 12-18 months of AQMA designation)	Action Plan should be in place.
December 2003	Completion of a second full Review & Assessment

The findings of the Review & Assessment are detailed in the "Leicester Air Quality Review and Assessment 2000 Final Report - Consultation Draft", published in September 2000. This recommended the declaration of an Air Quality Management Area on the basis of predicted exceedances of the statutory Objective for nitrogen dioxide.

On 4th September 2000 Cabinet approved this as a basis for consultation, and this marked the start of a six-week consultation period, ending on 13th October 2000. The consultation process is described in Appendix 3 of this Report and feedback is collated and reported in Appendix 4. Within this consultation framework, the Review and Assessment Report and its conclusions have now been accepted by the Secretary of State for Environment, Transport and the Regions.

This matter was also considered by the Arts, Leisure & Environment Scrutiny Committee at its meeting on 7th November 2000.

4. Headline Financial and Legal Implications

This work has largely been undertaken within existing departmental budgets. However, in recent years capital costs associated with air quality monitoring and modelling have been supported through a number of successful SCA bids. Details of further proposed expenditure are detailed in Appendix 6 of this report.

Under the Environment Act 1995, the City Council has a statutory duty to complete this Review & Assessment and declare any Air Quality Management Areas (by the suggested deadline of 31st December 2000). Under Section 85 of the Act, if it appears to the Secretary of State that a local authority is not meeting its obligations under the Act, the Secretary of State may direct the local authority to undertake a review as directed, revoke or modify AQMAs, prepare or modify its action plan, or to implement any measures in its action plan.

Consultation with the Head of Legal Services has indicated that:

- a) The approval of an AQMA, requested in this Report is a matter reserved to Cabinet by virtue of its being a matter of strategic policy significance.
- b) However, in view of this significance, Cabinet may choose to refer this matter to full Council under the current constitution, for public airing and formal approval at this level.

Report Author: Adrian Russell, Head of Pollution Control, Extension 6411

APPENDICES and SUPPORTING DOCUMENTS

Appendix 1	Equal Opportunities Implications.
Appendix 2	Sustainability and Environmental Implications.
Appendix 3	Consultation Strategy.
Appendix 4	Consultation Responses.
Appendix 5	Preliminary Analysis of Policy Implications.
Appendix 6	Supplementary Credit Approval for 2000/01.

Supporting Document, previously submitted to Cabinet on 4th September 2000:

Leicester Air Quality Review and Assessment 2000 Final Report – Consultation Draft, September 2000.

Appendix 1. Equal Opportunities Implications

Disadvantaged groups are more likely to live in areas of the City subject to higher levels of pollution.

Appendix 2. Sustainability and Environmental Implications

The local air quality management process aims to ensure that future national air quality objectives are achieved within the City; a key urban sustainability issue.

Appendix 3. Consultation Strategy

The process of undertaking this Review & Assessment of Air Quality has involved widespread internal and external consultation, which is reflected in the text of the "Leicester Air Quality Review and Assessment 2000 Final Report - Consultation Draft". An overview of the findings of the Review & Assessment were presented to Directors Board on 25th July 2000 and to Chairs & Directors on 14th August 2000.

Wide-ranging consultation is key element of the local air quality management process, and there is a wide range of statutory and recommended consultees.

In relation to public consultation, it is recognised that the Review and Assessment is a very complex and technical process, and the Final Report is a lengthy document. Therefore, the main aim has been to produce a simple, summary leaflet explaining the main findings and providing details of how and where copies of the full report can be viewed (libraries, internet, etc.) by anyone interested. Provision has been made for the translation of the summary information contained in the consultation leaflet. The timetable followed for consultation is:

4th September	Cabinet consideration Publication of Consultation Draft Report Start of public consultation period. Summary leaflets in public access buildings Copies of full report in libraries, on internet, and sent to consultees
11th September	Leicestershire Air Quality Forum joint consultation meeting (targeted towards "common" consultees such as Health Authority, Environment Agency, Highways Agency, key industries, etc.)
27th September	Article appeared in October LINK
30th September	Exhibition/display at City Rooms (enabling the public to discuss findings with officers)
13th October	End of public consultation period
7th November	Arts, Leisure & Environment Scrutiny
20th November	Leader's Briefing
4th December	Report back to Cabinet and declaration of AQMAs

Appendix 4. Consultation Responses

4.1 Leicestershire Air Quality Forum: Joint Consultation Meeting, 11 September 2000

At this meeting all local authorities within the County presented a report on the findings of their Review & Assessment work, or on their progress to date. The following is a summary of the some of the main issues discussed and raised at the meeting:-

- The air quality objectives apply to non occupational exposure, with the annual average exposure to NO₂ being of principal concern. This would not be an objective relevant to car drivers, although it is recognised that pollution levels inside vehicles may be higher than in the air outside the vehicle.
- In a city location approximately 75% of pollution is from road traffic. This proportion will be less close to a local point source.
- Major highways and trunk roads are of particular concern in rural Authorities. Only the Highways Agency can influence traffic management on these routes. DETR has advised that the role of Local Authorities is to highlight pollution problems associated with these roads, and it is the role of the Highways Agency to take appropriate action.
- Traffic management may move pollution emissions, without reducing it. However, one aim of any Action Plan must be to reduce the number of car journeys where alternative transport options are available.
- Already air quality is an issue being considered as part of the planning consultation process for proposed developments across the County.
- It is still unclear what powers will be available to Local Authorities in Air Quality Management Areas. One possibility is the power to undertake kerbside emissions testing.
- Leicestershire and Rutland appear to be further ahead with the Review and Assessment process than most neighbouring counties.

4.2 Responses of Statutory Consultees.

These are specified in Schedule 11 paragraph 1 (2) of the Environment Act 1995 and those which are relevant to Leicester City Council as an English unitary authority, together with their comments, are as follows. (For Members' convenience, key comments are highlighted in **bold italics**):

a. The Secretary of State for the Environment, Transport and the Regions. (DETR).

Since it is the Government which initiated the Local Air Quality Management process through the enactment of the Environment Act 1995, and subsequently moved it forward by means of the National Air Quality Strategy and Statutory Guidance Documents, the response of the DETR is clearly important. Where the DETR is dissatisfied with the conduct of a Review and Assessment, they can intervene by means of a Secretary of State's Direction.

Areas for comment on the conduct of the Review and Assessment might include:

- Have the prescribed administrative procedures been correctly followed?
- Are the technical procedures followed in accordance with the Guidance and is the investigation scientifically and statistically robust?
- Have the correct conclusions been drawn from the evidence, in accordance with the prescribed policy aims of the process?

Text of the DETR Review and Assessment Appraisal Report (Ref: DRA3-528):

"Report Prepared by: Leicester City Council.

Date Review and Assessment Report Issued: 12 September 2000.

The Report covers Stage 3 of the Review and Assessment required under the Environment Act 1995 and subsequent Regulations.

It concludes that air quality management areas will be required for nitrogen dioxide and PM₁₀. No further work is required for carbon monoxide.

The approach to the Stage 3 Review and Assessment and the conclusions reached are accepted for all pollutants.

Commentary

The report is well structured and provides most of the information specified in the Guidance. A precautionary basis has been used to identify areas for designation as AQMA's. The report has not identified areas of exceedance for PM₁₀, but still intends to cover PM₁₀ in the designation of AQMA's. This is not ideal, but is justified in the report."

There are a number of specific items to draw to the local authority's attention:...."

There follow a number of technical queries. These include a number of minor errors and matters of wording which will be clarified in the final Report.

The DETR also identifies some differences of approach to dispersion modelling, where the Pollution Control Group considers its position to be justified. These do not affect the main thrust of the Review and Assessment Report. As can be seen from the text of the Appraisal, it is suggested that these matters are taken into consideration during the next stages of Review and Assessment and they will be reviewed in detail with the DETR.

b. The Environment Agency.

The text of the letter of response from the Environment Agency was as follows:

“Environment Agency Response to the Consultation Stage 3 Report from Leicester City Council

Date: 13 September 2000

*Thank you for the consultation report from Leicester City Council. The Environment Agency welcomes the opportunity to read and comment on these consultation reports. **With respect to Part A processes, I do not have any further comments to make, and agree in general with the assessments made in your report.***

Please also find as an attachment to this email two recently produced documents that will be of interest to you:

Environment Agency responsibilities in relation to Air Quality Management Areas Implications of revised power station authorisations for local authorities’ review and assessments

In respect to forthcoming developments with Part A processes with relevance to air quality management, the Agency will endeavour to keep you informed of these.

I also write to inform you that I shall be taking over the responsibility for many air quality issues from Grahame Marsh, and that regarding air quality issues, contact with the Environment Agency can be made either by Grahame Marsh or myself.

If you require any further information please do not hesitate to contact me.

*Alex Newton
Regional Air Quality Officer (Midlands)”*

[The documents referred to are not quoted in this Report because they are not relevant to Local Air Quality Management in Leicester.]

c. Every local authority sharing a boundary with Leicester City.

In practice, every local authority in the “pre-unitary status” Leicestershire, together with the present County Council, was consulted in the same way. For the sake of convenience, their responses are all dealt with in this Section:-

(i) Leicestershire County Council.

Date: 10th October 2000.

“Thank you for your consultation on the above review and assessment for your area. I have considered this report and can inform you that the County Council has no comments to make. I look forward to receiving your final report in due course.

M. I. Thomson, on behalf of Director of Planning and Transportation.”

(ii) Blaby District Council.

Date: 18th October 2000.

“Thank you for the opportunity to peruse and comment on this report.

I have no particular issues to raise with regard to the results of the review and assessment process and note that the conclusions for nitrogen dioxide are similar to our own.

As an adjacent authority it is important that we continue to share information as has occurred thus far in the process, and I look forward to working together in the formation of action plans in the next year or so.

I hope that these observations are useful.

D. J Gould, Senior Environmental Health Officer, for Director of Community Services.”

(iii) Charnwood Borough Council.

Apart from acknowledgement, no response has been received to date.

(iv) Harborough District Council.

Apart from acknowledgement, no response has been received to date.

(v) Oadby and Wigston Borough Council.

Apart from acknowledgement, no response has been received to date.

(vi) Hinckley and Bosworth Borough Council.

Apart from acknowledgement, no response has been received to date.

(vii) North West Leicestershire District Council.

Apart from acknowledgement, no response has been received to date.

(viii) Rutland County Council District Council.

Date: 14th September 2000:

*“Re: Environment Act 1995, Part IV
Review and Assessment of Air Quality in Leicester
Statutory Consultation*

I am writing to confirm receipt of your letter dated 12 September 2000 regarding the above.

I have passed this on to Mr. Phil Trow our Director of Environmental Services who will reply to you directly with any comments he may have.

Dr. Janice R. Morphet, Chief Executive.

d. “Such public authorities exercising functions in, or in the vicinity of, the authority’s area as the authority may consider appropriate”.

These comprised:

(i) The Highways Agency.

The following response was received:

“A very well laid out document!

Just one small point: on page 152 where you list "other public bodies", The Highways Agency appears twice.

Cyril Day, Highways Agency.”

(ii) The Government Office for the East Midlands.

No response has been received to date, although the Government has responded to the Review and Assessment through the DETR's Air and Environmental Quality Division, as indicated above.

(iii) Leicestershire Health Authority.

Apart from acknowledgement, no response has been received to date.

(iv) Fosse Health Trust.

Apart from acknowledgement, no response has been received to date.

e. Bodies which are representative of business interests in the area “as the authority may consider appropriate”.

These comprised:

(i) The Leicestershire Chamber of Commerce and Industry.

“Having studied this substantial document I feel it would be useful to forward these comments:

The scientific methodology is well set out and the limitations of particular sampling methods are objectively reported. The statement of the characteristics of the individual pollutants is valuable. I note that the PM10 is recognised to be a mixture of components - is it yet realistic to fractionate PM10 components - to distinguish combustion products from "dust" and biological material?

Notwithstanding my limited knowledge in this discipline, I feel the effort to design an effective monitoring network has progressed well and that it should produce a good quality of data. One thought though - have there been opportunities to run control measurements when sections of road are completely closed to traffic?

However the main emphasis seem to be upon open air exposure, which will differ to some extent for people utilising different buildings for home, work and leisure. Has any thought been given to developing representative personal exposure measures for the more vulnerable population segments and for key buildings in high exposure areas?

Looking at the forecast density maps, the impact of motor vehicles is blatantly evident - are there any thoughts about linking real-time observations of vehicle density (e.g. Leicester Equal), on-vehicle emission monitoring etc. to help pinpoint contributory factors?

All in all, this document provides a strong foundation for addressing a demonstrably significant local environmental problem. It will become more valuable as underlying problems become accurately defined and effective remedies can be implemented.

Max Boden"

(ii) The Leicester Local Employers' Network.

Apart from acknowledgement, no response has been received to date.

f. "Such other bodies or persons as the authority considers appropriate".

These were dealt with in two groups:

Bodies sent a copy of the full consultation draft of the Review and Assessment Report:

(i) Elected Members of Leicester City Council not being members of Cabinet. (Copy of the Report deposited in the Members' Area.):

Councillor A. Vincent (North Braunstone) raised a query regarding the areas to be designated, and the fact that there are some "red" areas not designated. He specifically pointed to the area around Victoria Road East/ Tailby Avenue.

This matter was discussed at Scrutiny Committee: The areas of exceedance predicted in this area of the City would not appear to be justified from the traffic flows and other model input data. This may therefore be an anomaly but this will be carefully reviewed in the course of the modelling work for the Section 84 Review and Assessment.

(ii) Leicester Transport 2000.

This organisation responded with a formal "holding" objection to the Report on the basis that the time allowed for consultation was insufficient. (Their branch meeting took place on 7th October). They went on to state:

"LT2000 will be looking for the Council to justify that it has fully met the law in Part IV Environment Act 1995. Any proposed Air Quality Management Areas must be both technically and legally soundly based.

Further comments will be forwarded in due course LT2000 may or may not then withdraw its objection to the Review."

A letter was sent to the Chair and Vice-Chair of Leicester Transport 2000 on 19th October, which:

- Apologised for the short time available for consultation.
- Pointed out that the time-scale was driven by DETR requirements.
- Offered to extend the deadline for comment as far as the timetable detailed in this Report permits.
- Pointed out that further opportunities for consultation were available through 2001, during the "Section 84" Review and Assessment and the preparation of the Air Quality Action Plan.
- Offered to send a representative to any meeting or seminar which Transport 2000 might suggest.
- Stated that the objection would be reported to Members, if not withdrawn.

(iii) Friends of the Earth.

Telephone discussions have taken place but no written response has been received to date.

(iv) Leicester University (Dr. Paul Monks, Department of Chemistry, an expert on atmospheric chemistry, whose comments were previously reported in the Leicester "Mercury").

Apart from acknowledgement, no response has been received to date.

(v) De Montfort University (Professor Kevin Lomas, Institute of the Environment and Sustainable Development).

Apart from acknowledgement, no response has been received to date.

(vi) Leeds University (Dr. Margaret Bell, Institute for Transport Studies).

Apart from acknowledgement, no response has been received to date.

(viii) Environ.

Apart from acknowledgement, no response has been received to date.

(ix) Others.

Copies of the full Report were also sent, on request, to the following (Comments are noted occur):

Mr. John Henwood,
C.A.R.D (Citizens Against Road Development.

In requesting the full Report, this consultee noted that he has,

"...serious reservations and concerns about it. I don't accept that the suggested methods will resolve the situation on the A46/A47 link road or the A6 in Oadby, although I appreciate that the latter is not in your area.

I would like to comment much more fully ...and I am therefore writing to request a complete copy."

Further comment is awaited, at time of writing.

Bodies and individuals sent a copy of the Executive Summary leaflet based on the Report.

A Register of Consultees was compiled from a survey of relevant organisations. Bodies or individuals having previously expressed an interest in local air quality issues were also included. Each was informed that the full Report was available on request; alternatively, it was available for inspection at every City library and at the Customer Service Centre at New Walk Centre; the Report is also on the City Council's website.

Bodies targeted included:

- Tenants' and residents' associations.
- Community groups.
- Other environmental and transport Groups.
- Other, specialist business groupings.
- Major local companies.

Despite some 81 consultations having been sent out in this way, very few comments have been received to date. Therefore, for the sake of clarity, responses from this second group are included in Section 4.3 (b), "*Other Consultees: Other Comments Received by Letter, E-mail etc.*", below.

4.3 Other Consultees.

a. Exhibition at City Rooms on Saturday 30th September 2000

This exhibition aimed to provide the public with an opportunity to examine the Review & Assessment findings and discuss any queries with officers present. The City Council's mobile air quality monitoring station was stationed outside the building. Leaflets were distributed to interested shoppers and other passers-by, and they were invited in to view the exhibition. Approximately 200 people visited the exhibition. Officers then explained the Review & Assessment findings as presented in the display material, and then invited people to make their comments on the forms provided.

Comments forms were completed by 73 people. The form included two questions with tick box answers (designed to focus attention on the main issues relevant to this particular consultation exercise):

“Do you think that the proposed Air Quality Management Areas are in the most appropriate places?” [68 people answered this question]

Yes	51%
No - more main roads should be included	35%
No - more of the city should be included	22%
No need to declare an AQMA	1%

“Do you agree with the levels of pollution predicted for 2005?”
[68 people answered this question]

Yes	41%
No - I think pollution levels will be lower than predicted	10%
No - I think pollution levels will be higher than predicted	49%

The form then provided additional space for any comments or suggestions and 54 people made such comments. These comments are listed in full, but the main themes are summarised below (with number of people commenting on each issue shown in brackets):

I suffer with asthma/notice effects of air pollution on health (6)

Supportive of work to improve air quality, pleased with AQR&A work, display, etc. (11)

More information on air quality requested (Leicester Air Quality Bulletin &/or full report) (29)

Improvements to public transport needed (21)

More Park & Ride (3)

Encourage cycling, walking & other forms of transport (6)

Greater use of alternative fuels (5)

Reduce cars, congestion, HGVs on roads (7)

Tackle emissions from stationary buses & cars, carry-out emissions testing (7)

Specific written Comments received by at the City Rooms and otherwise by letter and e-mail are summarised below:

“Very well explained - I am now aware of the problem & possible solution” (City resident).

“Keep up the good work you are doing” (City resident).

"I agree with the idea of increasing public transport so less people use their cars. The pollution is terrible. It is something I feel strongly about as I do suffer from asthma and hope the pollution levels decrease in the near future" (Glenfield resident).

"Although pollution is bad, more needs to be done to improve public transport to get people to leave cars at home, public transport is getting worse and if I had a car wouldn't use the bus, so do more with buses and cars will stay in the garage". (City resident)

"We are encouraged to use public transport but the price is always rising making it cheaper to come around to places by car". (City resident)

"Car parking prices lower for small cars" (Kettering resident)

"The city lies in a hollow so as the mists linger traffic fumes do also. Traffic will increase so will fumes. Pollution will always be a continual problem because population increases cars, etc". (City resident).

"Air pollution seemingly would be significantly reduced if people used less fossil fuels. The government should pressurise all relevant bodies to ensure we are all driving cars fuelled by alternative means". (City resident).

"Traffic lights/road humps etc., all contribute to higher exhaust levels, also higher petrol/diesel consumption which obviously = higher pollution levels". (City resident).

"Public transport needs re-thinking entirely. Buses take too long; routes should be shorter to make them quicker. Why not run the buses along similar lines to taxis? i.e. people can book their places on the bus perhaps the day before so the driver knows how many people to pick up and where and when! So the route can be shorter and more convenient for passengers. Make bus tickets more widely available so people can buy them before getting on the bus. Also I noticed that 10% of cars produce 90% of emissions. BAN THEM! Or at least give them massive fines."

"There should be more car sharing. Can you not have a co-ordinator so people can offer places in their car or people without cars can find a person to travel with?"

"Flexible working should be encouraged so more people can work from home or work different hours to the norm."

"More school buses should be provided to cut down on the 'school run' or walking buses should be encouraged."

"Finally, more provision for cyclists, scooters, rollerblades etc., so they can come off the road and travel more safely. More people would use these modes of travel if there were safe routes for them to travel. Encourage scooters and rollerblades, particularly for children and city centre dwellers, not ban them and give them fines!" (residence not know)."

"Include details from other areas such as Blaby, Oadby and Wigston. Introduce monitoring areas where large super-markets are placed in residential areas. Supermarkets should be taxed or fined if they fail to offer alternative transport, e.g. free buses. Also supermarkets should be set traffic reduction targets at a local level". (Oadby resident)

"Alternative transport, electric

? Why trams

Why not trolley buses

no tracks on roads

can pull into the kerb to load or unload

tyres on roads quieter than steel wheels on rails." (Wigston resident)

"I don't believe more cars will be coming into the city centre in the future.

Older buses should be thoroughly inspected/overhauled to reduce pollution.

Apparently the long-term problem of bus engines running while stationary hasn't yet been received.

Government should encourage/subsidise LPG conversions for motorists". (Lutterworth resident).

"Not qualified to predict! Most anxious about PMs". (City resident)

"I think this is an important subject and I am glad it is receiving this attention."

I think promoting and improving all public transport is a good idea as England is a very densely populated country with relatively short distances between cities. Many people seem to have cars and not really need them." (Narborough resident).

"Need to look at not only the air pollution - but the rubbish that people generate. The green bag system works but - if you were to carry out a survey in a street in e.g. Belgrave, 95% of the people do not recycle. What about other forms of energy?? i.e. wind." (City resident).

"I think you are doing a good job within your field". (City resident).

"I would support measures to reduce traffic congestion on trunk routes into the town centre". (City resident)

"Should be free bicycle hire services like the supermarket trolley - pay and ride, return and collect your money - at any cycle site. Less traffic in city. More courier services should use tricycle with storage and also postmen. Create more cycle lane in the city. Train more people to ride bicycle. Put cycle lane next to bus lanes as there are more of them". (City resident).

"More encouragement to convert to LPG, cheaper public transport, less industry in the city. (City resident).

"Want improved public transport to encourage people to stop using cars. Bus companies must not be only profit motivated. More people use cycles". (City residents).

"Trams want them back - lines are still there. Monorail?". (City resident).

"Too many cars on the road. Restrict parking on road and pavement. Buses stop running engine". (City resident).

"Action to bring in legislation to stop bonfires. Planning conditions on all new development to restrict working hours on Sat pm all day Sun and Bank holidays..." (Nottingham resident).

"Specify which planned but unbuilt routes are taken into account (i.e. Victoria Road East extension). (City resident).

"There is an increase in heavy duty very large wagons and of course too many cars". (City resident).

"Park and ride scheme for Humberstone/Uppingham Road. Stop HGV using side roads of main "A" road" (City resident).

"I think that this survey is good for Leicester, the people of Leicester. I do think that in the past not enough has been done regarding this issue, but hopefully this survey will be a step in the right direction and consequently lead to cleaner air and encourage people to walk when can and use public transport. You have to think about our children, their children, etc" (City resident).

"Schools should not be near main roads". (City resident).

"I suffer from asthma and live in the city centre on Oxford Street. The level of traffic is much worse since I came here in 1984. I feel that a lot more has to be done to achieve a clean air city. Heavy through traffic should be banned and forced to use the outer ring road. Also there should be a more aggressive move towards a better and more efficient public transport. This city sadly lacks motivation". (City resident).

*"- More accessible public transport
Realistic cycle routes and lanes
Shared car ownership policies
Publicity promotions encouraging people to cycle
Higher priced cars and petrol.
Cheaper prices for public transport
Limitation on people buying cars by the government
Education on car usage - why not to use the car for running down to the shops*

Serious advertising campaigns - why not brainwash people into doing something useful for a change?

I want to see action".

(City resident)

"More info possibly required to make a proper judgement on the report. Clearer diagrams perhaps less 'wordage' so that people can see clearly 'at a glance' which are likely to be problem areas.

Other than that, it is very informative and obviously highlights what many people may have no idea about". (City resident).

"Bus services need updating. They need to be kept cleaner and timetables reliable. Traffic not needing the city centre should be encouraged to use the ring roads. Air pollution from planes needs monitoring". (City resident).

"Look at alternative fuel sources for public transport. More park and ride places covering most of the routes in, especially Narborough Road. Look at some subsidisation of public transport, may not be economically viable though? Education schemes". (Address not known).

"Too much traffic in city - need to use bypasses. Council should open up their ears and listen to what the public have to say. Too many individuals drive through Leicester and it isn't necessary to make these journeys". (City resident).

"Keep up the good work! As a Leicester City dweller I am pleased at all the work being done to help keep Leicester's environment clean". (City resident).

"1 -I welcome any attempts to reduce air pollution in the City.

2 - Planning need to consider effects on air quality of new proposals - the siting of facilities likely to increase traffic coming into the city or moving across the city need to be considered and listed a high priority (e.g. mosque at end of Evington Road is bound to increase traffic flow just after the introduction of traffic calming - seems contradictory.

3 - Public transport has to improve - cheaper and more reliable.

4 – Cycling in this city even with the work done to improve (introduce cycle lanes is still very difficult). Parking on cycle lanes is allowed - my local councillors told residents this. The use of cycle lanes to road narrow is unacceptable - I am not a bollard! Cycle lanes are not kept clean and are not continuous so journey times are slow.

5 – More park and ride needed.

6 – More work with parents to reduce numbers taking kids to school - so more publicity in local paper about the effects. More restrictions around school gates to discourage this traffic. Walking, buses where appropriate.

7 - Difficult to make any significant improvements without a national plan and change in how we think about transport of goods and people across large distances."

"I have no basis on which to comment. I assume you are basing your prediction on reliable data and models".

(City resident)

"More trees planted when roads are built and in city centres as these are natural air cleaners". (Desborough resident).

"More buses".

(Loughborough resident).

"It seems to me that stationary cars/buses cause most of the problems. Cars and buses cannot realistically be removed from the city; therefore an efficient traffic circulating system would be an

improvement. Park and ride schemes should be encouraged and a culture shift where children are not driven to school!".
(Groby resident)

"The pollution level is very high and there should be something done about it. I know you are doing as much as you can but when I am in the car and fumes come through the air vent, I feel very sick and become to heave. As you have said the pollution rate will be worse in 2005 before we reach this year I think that we should try to reduce this point and make it become less".
(Anstey resident).

"Are garden bonfires allowed?"
(Leicester resident).

"As an occupant of Glenhills Boulevard I would like to see the monitored results issued in the Link or any similar monthly free issues".
(Leicester resident).

"1 - I have got concerns about the data that was presented to me today in terms of statistical correctness and omitting of crucial data. I would like to see a model which distinguishes between industry/transport/domestic emission generation.

2 - I would like to see the "evidence"/grounds on which the 2005 model is based. Purely cleaner emissions from transport won't achieve this.

3 - Finally, good presentation for the average citizen, well informed personnel. I am keen to be kept up to date".
(Wigston resident).

"The air pollution is very bad on New Parks Way dual carriageway. We are unable to have windows open for smell of fumes and noise. I can't think what can be done to improve things as the amount of traffic keeps increasing". (City resident).

"I welcome the system of local air quality management as my daughters are continually making comments about the air quality and city air pollution - I feel if children are noticing the smell, we have got problems. (Anstey resident).

"What are the additional measures in the AQMS? Should have more dedicated bus lanes?"
(City resident)

"Display is satisfactory".
(City resident)

"Less cars and buses in the middle of town. Use park and ride services". (Loughborough resident)

"Leicestershire has a very good public transport policy. However it needs to be extended still more, As an OAP I try to use public transport whenever possible. I suffer from asthma which I think is mostly due to traffic pollution even in outlying district, so possibly the AQMA does need to be extended". (Mountsorrel resident).

"1 - Too many cars - not necessary if public transport is improved.

2 - Public transport - still totally unreliable and too many antiquated buses.

3 - Bus congestion needs to be looked at i.e.High Street/Belgrave Gate". (City resident)

"I think that traffic control plays a big part and fuel emissions should be checked more regularly".
(Sapcote resident).

"All current initiatives to reduce traffic pollution are proportionately unfair to low waged and unemployed. These include : road tax is lower for newer (technology) cars, road tolls, increased fuel charges, grants for conversion to LPG are only for new cars. Provide cash incentives for the vast majority of car users to convert to other fuels or other forms of transport.

Now it's here, the car can't be un-invented. Financial constraints will just cut pollution by hurting the poor.

Cheap public transport, grants to convert to alternative fuels for transport, domestic and commercial power. The council replacing electric and gas heating in their housing stock with true renewables (not burning refuse) more combined heat and power and maybe taking up Tony Benn's idea of using a car tax licence as a bus pass would be of some real and practical help.

Organic living (in it's fullest sense) is becoming just another exclusive activity for the middle classes.

There are more low waged in Leicester than high earners". (Glenfield resident).

"I'm writing first on a way of making general comments - hope they're useful.

Public Transport needs to be more useable by the occasional user ... so present integrated timetables in easily read writing (too minuscule for anyone without perfect vision at present); use diagrams to show stops (many of use don't know the names of the roads); quote journey times; realise that massive subsidies will be needed to get the cost below that of petrol (otherwise its more convenient and cheaper for one or more people in a household to use the car); integrate with other forms of public transport (and include secure cycle parks). Forget penalising the motorist any further - you don't need any more opposition to your plans.

Minimising travel - Audit each council job to see what amount can be lopped off employees' travel (e.g. most jobs can be done partly from home if desired). Bring in policies to allow this. Publicise them and use any grants available to encourage other employers to do the same. Put pressure on government to introduce similar grants and projects.

*Would appreciate a reply to the ideas put forward. They're politically very difficult for lots of reasons but I do think they represent a way forward. Good luck".
(Broughton Astley resident).*

b. Other Comments Received by Letter, E-mail etc.

"Regarding the article in the Link - I reiterate that no mention of Leicester's factories contributing their own pollution - just stuff blowing in from the continent!!!

The three factories just behind Dunton Street - Russell's Castings, Harrisons and Charlesworths frequently emit foul smelling odours/pollution in this area. It is quite difficult to differentiate the odours. This not only happens during 'office hours' but throughout the nighttime and at the weekend. The house fills with the smell and you can often see a haze in the street. This pollution worries me a great deal, not only for my own health, but for the children that are growing up in this area and all local people.

You state that there is a measuring device in Bassett Street, but this monitors traffic pollution. I and many others in this area would like to see these factories levels of pollution being monitored and suggest that Repton Street be checked.

I look forward to hearing from you."

(E-mail from a resident of Dunton Street, Woodgate).

"I refer to the recent edition of Leics Link where you ask what people think about the air quality issues. I would like it registered that my own opinion is that Leics City Council spends far too much time and money on this issue and it should be an area that is given less priority, less funding and less time wasted on it.

I appreciate that it is a relatively important issue - but it would appear that Leics Council is spending far too much money and effort on the whole issue of environmental protection and not thinking of the practicalities of life. Leics is a big city, over populated and it's bound to be polluted etc etc. but there are more important things it should be spending the vast amounts of money it

currently wastes on researching and practising environmental purity that it can never reach! (or maybe even reducing the huge Council Tax it requests to fund these activities?!?!)."

(E-mail from Leics. resident).

"...there are certain issues concerning the increasing levels of pollution pumped out into our environment, such as from car exhausts.

I would like to know what solutions you can come up with to prevent this, such as frequent buses, better travelling conditions, reduced fares, traffic lights, bus lanes or has Manchester has come up with a tram.

...I hope that you will take some of my objectives and solutions and consider what can be done to make Leicester's CBD a more environmental, more enjoyable and safer way to travel to work."

(Birstall resident).

"I'm sure there would be a lot less pollution if all motor vehicle drivers would turn off their engines when stationary."

(Resident of Laburnum Road, LE5.)

"...I have received every one of your monthly Air Quality Bulletins...

...I feel that generally this nation is very much going in the right direction as we have done, particularly in Leicester, during the nearly 7 years span of the bulletins.

I have come to the conclusion that, as you say, the City Council cannot do much on its own, this has been and will remain the case and sooner or later there has to be a time when the whole of about 192 Nations on earth treat the matter more seriously.

...We have made a start we can say with honesty, can others. We could do with some figures to justify our efforts or to shame them to catch us up; how about it then?

...Even our own City Council heavy trucks could be both cleaner and quieter..."

(Resident of Evesham Road, LE3.)

"Whether the Council achieve their objectives or not, they need and deserve the support of everybody in the City and County."

(Letter from an Oadby industrialist (copied to the City Council), in response to an article in the Leicester "Mercury", which quoted the views of an expert at Leicester University on air quality in Leicester. The primary purpose of the letter was to object to the alleged sale of land in Oadby by the University for redevelopment).

"It would...help if buses didn't sit around the City Centre with their engines running constantly..."
(Anonymous letter)

"I am the Environmental Care Officer for Customs and Excise in Leicester..."

...The office is situated on St. Margaret's Way, at the junction of Sanvey Gate, Vaughan Way and Burleys Way. This area is said to be the worst polluted part of Leicester with traffic

congestion playing a major part. After I sent an internal e-mail to staff in the office, I received some interesting comments...

'...This is likely to become more of an issue for us in the near future, when a large number of additional people are housed in this office. The trickle vents will probably not allow sufficient replacement of air within the building, and in any case are letting in highly polluted air...'

'...Can't they use the racecourse on non-race days for park and ride?...sort out the buses a bit better in the centre so they flow easier, it always seems so blocked on Haymarket/Charles Street...'

'...The main areas appear to be the clock tower...I don't think Nottingham would let a lot of through traffic near their castle would you?...'

'...I can't get a bus from Oakham and the train fare, before 0900 is £8.20 per return day...How can you ban cars from the city when transport from the towns and villages outside is so expensive...?'

The office has in place a Green Local Transport Plan to encourage more efficient use of the transport available. As the office is situated in the city it has limited car park spaces which, naturally drives people to look for alternatives to using their cars when not needed. Officers have commuted by bike, car share and public transport, and more so during the fuel crisis. However, as indicated by the last comment of feedback, alternatives aren't always a better option. In fact during the fuel crisis, I was commuting by bus and overheard a gentleman complain, "...80p. to travel on a bus and I can't even sit down, it's worth paying more for petrol and travel by car...". Admittedly, the bus was overcrowded but it gives an indication of peoples thoughts when faced with the alternatives.

Although Leicester is Britain's first environmental city it seems to have a conflict of ideas on how to deal with congestion. The inner ring road (Vaughan Way/Burley's Way) was narrowed, creating more congestion, with no realistic alternative modes of transport being available. There also seems to be a trend of pulling down an old buildings and car parks being put up in their place, is this to attract more cars to the city centre? I have also received general feedback about the lack of park-and-ride facilities for commuters, only one regularly operated from the west (A47/Hinckley Road). The north and south sides of the city, both access to the motorways and the traffic from them create a lot of congestion in the city....

These may not be the long term plans but, there is obviously a very mixed message about the commitment from Leicester City to improving the air quality. As was stated in your Air Quality Bulletin the City Council cannot improve air quality on its own....but, people need real alternatives for this to work. If there are schemes in place, I would appreciate more details so I can advertise and promote them in the office and , hopefully, do out bit to ease congestion and pollution in the city...

(G. Germaney, H.M. Customs and Excise, Citygate House, St. Margarets Way)."

Appendix 5: Preliminary Analysis of Policy Implications.

A. The Next Procedural Steps.

Upon publication of this Report, Leicester City Council is required by Section 83 of the Environment Act to declare Air Quality Management Areas (AQMA's), based upon those areas where there is a predicted failure to meet any of the air quality Objectives. The statutory Guidance states that such areas should be designated within four months of completion of the Stage 3 Review and Assessment presented in this Report.

Section 84 (2) of the Environment Act 1995 then requires the City Council to prepare a time-based Air Quality Action Plan (AQAP), aimed at securing compliance with the Objectives. The aim should be to go to public consultation on the Action Plan within 9-12 months of designation of AQMA's and to have the Action Plan in place within 12-18 months of designation. The Action Plan must be time-based, although no specific deadlines are set.

It can be seen from the Review and Assessment Report that the key air quality issue in Leicester is that of emissions from motor vehicles. Therefore, appropriate policy objectives for the prospective Leicester City Council Air Quality Action Plan will be framed in terms of measures directed toward minimising exposure of the population to elevated levels of the identified traffic pollutants.

The next step will be a further, detailed Review and Assessment of air quality in the Air Quality Management Areas, as is required by Section 84 of the Environment Act. This will run in tandem with the formulation of the Action Plan and both processes will also be subject to full, public consultation. The Council is well placed, with its air quality monitoring network and dispersion models, to assess progress toward the air quality Objectives and to evaluate different policy options.

Leicester City Council already has a broad environmental policy framework improvement in place. A comprehensive Air Quality Strategy was launched in 1998, which is cross-referenced to the key documents summarised below. These interlock with each other and provide a policy base on which the Air Quality Action Plan can be constructed.

It has not been possible at this stage to include an evaluation of the impact of many of these strategies now "in the pipeline" in the present Review and Assessment. The Action Plan will not necessarily imply a radical policy shift but will, to a large extent, be integrated with the existing policy package. Nonetheless, the application of existing policies will need to be reviewed carefully and in detail in relation to the Air Quality Management Areas. A matrix is presented below of possible, generic policy options, as a starting point for this evaluation process.

The focus of the Review and Assessment Report is the impact of local air pollution emissions on the well-being of the population of Leicester: There are also pressing global sustainability and climate issues. In most cases, policy objectives relating to the two will be complementary: For example, reduction in the consumption of carbon based fuels will benefit programmes to reduce emissions of greenhouse gases. In a few cases, the respective policy analyses may point in different directions: An example is in the field of vehicle fuel policy. Again, the existing policy base will need to be re-assessed in order to establish priorities and to ensure that these are being pursued in the most appropriate way.

B. Existing Council Policies.

(i) The Strategic Direction.

Leicester City Council has an ongoing commitment to Integrity and Sustainability: This Strategic Direction is summarised in four core aims:

- Environmental Quality
- Economic Prosperity
- Social Justice
- Cultural Diversity

Apart from Environmental Quality, the other aims will not be neglected: Some disadvantaged groups are more likely to be exposed to adverse air quality, as inspection of the proposed Air Quality Management Areas reveals (Fig. 1 in the Review and Assessment Report).

(ii) Leicester's Community Plan.

This document, which is essentially a compact between the different stakeholders in Leicester, is currently undergoing consultation. It details a number of goals in relation to the environment and in particular that "to ensure that national...air quality standards are met, and increase awareness and understanding of air quality issues". In addition, it states a number of other policy goals relevant to this Report:

- To slow and reverse the growth of car travel in Leicester.
- To increase the role and usage of public transport.
- To encourage cycling and walking.
- To reduce pollutant emissions from industry, transport and other sources.
- To encourage a partnership approach to pollution control between public bodies, industry and the community.
- To ensure that the Planning system protects and enhances the environment.
- To create a healthy living environment with good quality air...and housing...

(iii) City of Leicester Local Plan (CLLP).

The Plan, which is currently under revision, is the principal land-use planning policy document which helps to guide and support development in the City. It complements the Leicester, Leicestershire and Rutland Structure Plan which comprise the relevant elements of the Development Plan for the City.

With primacy now being given to sustainability the integration of air quality and pollution issues into policy formulation will be a feature of the replacement Local Plan. At the heart of this are proposed three strategic policies:

- Scrutiny of development proposals in the Air Quality Management Area taking into consideration the requirements of the Air Quality Action Plan. This is also part of a general pollution policy.
- Reduction of energy consumption through transport and access linkages.
- Integrating Planning and Transport:-

Developing sustainable forms of transport linkages; locating developments in most accessible locations and established centres; improvements to walking, cycling and public transport networks; promotion of mixed use developments; requirements for transport assessments and travel plans for large scale developments.

A sustainability appraisal of the policies of the draft plan has been undertaken. Each policy has been appraised against a set of Factors which include 'air quality' and 'transport mode'.

(iv) Central Leicestershire Local Transport Plan (LTP).

Leicester City Council and Leicestershire County Council submit a joint bid for funds to improve local transport in "central Leicestershire" The Central Leicestershire Package Area has recently been extended to reflect more accurately the Leicester travel to work catchment area. The total population of the area is 525,000, of whom 275,000 live in the City. The first Local Transport Plan covers a five-year period from 2001 to 2006 and guidance issued by the DETR makes it clear that the Plan should take account of Local Air Quality Management issues.

The overarching strategy of the LTP is integration within and between types of transport and with land-use planning. Elements are included which interlock with Local Air Quality Management as well as with social inclusion, regeneration and other, wider aspects of Government policy.

The main priority is to improve local bus services, including the provision of more "Park and Ride" sites, and to improve safety for vulnerable road users, in particular cyclists and pedestrians.

(v) Leicester Local Agenda 21 (LAG 21) Action Plans.

This document reflects the City Council's role as a partner with other stakeholders in securing world-wide sustainable development. It sets out a vision for the future, guiding principle and supporting aims and main targets. These include:

- To improve air quality and achieve national air quality objectives by the year 2005.
- To extend the air quality monitoring network.
- To develop air quality modelling systems as a policy tool in relation to air quality, transport and land use planning.
- To reduce emissions from industry, transport and other sources in the City.
- To improve local air quality information systems and increase awareness and understanding of air quality issues.
- To encourage a partnership approach to pollution control involving public authorities, local industry and the community as a whole.

(vi) Leicester City Council Eco-Management and Audit Scheme (EMAS) Manual.

This document defines the City Council's own standards of behaviour in relation to the environment. The Manual:-

- States the Council's Environmental Policy.
- Sets out Environmental Objectives and Targets.
- Provides a Register of the Council's environmental effects.
- Provides a Register of environmental legislation with which the Council must comply.
- Provides a Register of internal policies and international commitments.
- Sets out a management system and key tasks.

One environmental target is to reduce emissions of fleet vehicles by 2002, as follows:

- Sulphur dioxide by 98%.
- Total hydrocarbons by 42%.
- Nitrogen oxides by 12% of April 1997 levels.

C. Policy Objectives.

In order to improve air quality in the AQMA's, attention should be paid to the following variables:-

- A. Numbers of vehicles flowing past critical points in the City. (I.e. Locations where people are exposed to excessive concentrations of traffic pollutants in AQMA's, over the relevant averaging periods).
- B. Vehicle/miles within the LTP area.
- C. Emissions per vehicle/mile.

Appropriate generic strategies to achieve each of these can be tabulated as follows:

Strategy	A	B	C
a) Transport modal shift	✓	✓	
b) Elimination of unnecessary travel / transport	✓	✓	
c) Redistribution of traffic flows	✓		
d) Reduction in free-flowing traffic speeds			✓
e) Reduction in congestion / queueing			✓
f) Reduction in old / poorly-maintained vehicles in all / part of the area			✓
g) Promotion of appropriate automotive technologies in all / part of the area			✓
h) Avoidance of development where relevant exposure can occur in close proximity to major roads.	✓		

The specific, existing strategies below can be evaluated against this matrix and modified or expanded as necessary.

D. Current Strategies for Improving Air Quality:

The following strategies can be identified from the City Council policies summarised above:-

- Encouraging modal shift (public transport, cycling and walking rather than car use).
- Reduction in the need to travel.
- Redistribution of traffic flows.
- Reduction in free-flowing traffic speeds.
- Reduction in traffic congestion.
- Reduction in old and poorly maintained vehicles.
- Promotion of cleaner automotive technologies.
- Reduction in nitrogen dioxide emissions from Council vehicle.
- Energy conservation measures.
- Regulation of emissions from industrial processes.
- Health Promotion, Information and Education (including involvement of the Education Department).
- Avoiding sensitive development in close proximity to the major road network.

- Improvements in air quality monitoring and modelling capabilities. E.g. SCA approval for 2000-1 for two additional nitrogen dioxide monitoring stations in AQMA's.

E. Potential Additional Strategies.

The following could additionally be implemented as part of the Air Quality Action Plan.

- Implementation of measures contained in the LTP which have not been taken into account in this Review and Assessment because they are not currently certain to be implemented or because their impact on air quality cannot be precisely quantified, e.g:
 - ◇ Provision of additional park and ride sites.
 - ◇ Public transport improvements.
- Introduction of traffic management strategies specifically focussed on reducing congestion and emissions (without causing problems elsewhere!).
- Reduction of speed limits on roads within AQMA's for air quality as well as safety reasons.
- Declaration of Low Emission Zones (LEZ's).
- Encouraging local improvements in vehicle emissions:
 - ◇ Publicity and education.
 - ◇ Partnerships with business etc.
 - ◇ Implementation of statutory roadside vehicle emissions testing powers (proposed for local authorities within AQMA's).
- Improvements in capability in order to refine future air quality predictions:
 - ◇ Air quality monitoring.
 - ◇ Emissions inventories.
 - ◇ Dispersion modelling.
 - ◇ Traffic modelling.

APPENDIX 6 Supplementary Credit Approval 2000/01

The DETR Supplementary Credit Approval (SCA) Scheme for Air Quality Reviews & Assessments is intended to help meet local authority requirements for capital expenditure in this area.

The review & assessment of air quality is a complex task that necessitates detailed monitoring and computer modelling of air quality conditions to identify pollution hot-spots within the AQMA. The investigation and construction of the Action Plan will entail detailed co-ordination with Traffic and Land Use Planning functions of Environment and Development. Following an assessment of requirements, an SCA application totalling £51,000 was submitted to the DETR for the purchase of two nitrogen dioxide monitoring stations, to be located at appropriate points within the AQMA.

The Director of Environment and Development, in taking the action of placing orders for the necessary equipment without going out to competitive tender, certifies as follows (Standing Orders, para. 66, (c), (v)-(vi)):-

- a) The case is one of urgency: The deadline for defrayment of the relevant expenditure is 31st March 2001, and therefore an expedient purchase of the equipment (which has a long lead-time from placement of the order) is required. In addition, the equipment needs to be placed in service as soon as possible for timely discharge of statutory duties.
- b) The relevant equipment needs to be type-approved by the Government and compatible with the existing network: There are only a very limited number of suppliers capable of delivering equipment meeting these criteria. Detailed competitive quotations have been taken from each and the order placed with the company offering the lowest acceptable price.

Recommendations

Cabinet is asked to:

1. Approve the capital expenditure of £51,000 in relation to statutory review and assessment of air quality, funded by Supplementary Credit Approval.
2. Note that the Director of Environment and Development, in placing orders for air quality monitoring equipment exceeding £35,000, certifies that:
 - (a) the expenditure is required as a matter of urgency in order to defray the relevant expenditure by the SCA deadline and effectively to discharge statutory duties and it is not expedient to adopt a formal tendering procedure, (Standing Orders, 82.1 (k)), and;
 - (b) for reasons of system compatibility, there are only a very limited number of suppliers capable of delivering appropriate equipment; detailed competitive quotations have been taken from each and the order placed with the company submitting the lowest quotation, (Standing Orders, 82.1 (e)).
3. Approve the addition to the Capital Programme of £51,000, to be financed by borrowing under Supplementary Credit Approval for expenditure in 2000/01 in relation to the Review & Assessment of Air Quality.

Financial Implications

The £51,000 will be met from Supplementary Credit Approval and would constitute an addition to the 2000/01 Capital Programme. Debt charges on this sum would be an estimated £5,000, which will be reflected in the Revenue Support Grant settlement.