

EXECUTIVE

Date: Tuesday 7 September 2021
Time: 5.30 pm
Venue: Guildhall, High Street, Exeter

Members are invited to attend the above meeting to consider the items of business.

If you have an enquiry regarding any items on this agenda, please contact Mark Devin, Democratic Services Officer on 01392 265477.

Due to social distancing guidance brought about by the Corona Virus outbreak, this meeting is only open to members of the public who have registered to ask questions under Standing order No. 19.

For the general public the [live stream can be viewed here](#) at the meeting start time via Facebook.

Membership-

Councillors Bialyk (Chair), Wright (Deputy Chair), Foale, Ghusain, Harvey, Morse, Sutton, Williams and Wood

Agenda

Part I: Items suggested for discussion with the press and public present

1 Apologies

To receive apologies for absence from Committee members.

2 Minutes

To approve and sign the minutes of the meetings held on 6 July 2021 and 8 July 2021. (Pages 5 - 22)

3 Declarations of Interest

Councillors are reminded of the need to declare any disclosable pecuniary interests that relate to business on the agenda and which have not already been included in the register of interests, before any discussion takes place on the item. Unless the interest is sensitive, you must also disclose the nature of the interest. In accordance with the Council's Code of Conduct, you must then leave the room and must not participate in any further discussion of the item. Councillors requiring clarification should seek the advice of the Monitoring Officer prior to the day of the meeting.

4 Local Government (Access to Information) Act 1985 - Exclusion of Press and Public

RESOLVED that, under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting during consideration of item 10 on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Part I, Schedule 12A of the Act.

5 **Questions from the Public Under Standing order No. 19**

To receive questions relating to items on the Agenda from members of the public and responses thereto.

Details of questions should be notified to the Corporate Manager Democratic and Civic Support by 10.00am at least three working days prior to the meeting. For this meeting any questions must be submitted by 10.00am on Thursday 2 September 2021.

Further information about speaking at a committee can be found here: [Speaking at a Committee](#)

6 **Urgent Matter - Response to Teignbridge Local Plan consultation**

To note the Urgent matter of the response from Exeter City Council to the Teignbridge Local Plan Site Options Consultation, run by Teignbridge District Council between late June and early August 2021. This is the third consultation which has been held on the Teignbridge Local Plan and considers the various development site options which could be taken forward into the draft plan at a later date. Due to the timings of the consultation and Exeter City Council's meeting dates it was not possible for the Executive to consider a draft response in advance of its submission. The response to the consultation has been treated as an urgent matter.

(Pages 23
- 30)

In accordance with the Council's Constitution, it has been discussed with the Leader, the Portfolio Holder for City Development and the Chair of the Strategic Scrutiny Committee, and the Executive is now invited to note the response which has been submitted and dealt with under emergency provisions. The key issues identified relate to the need for cross-boundary discussions over strategic matters including employment and infrastructure strategy, together with a discussion of the impact on the city of a series of potential residential and employment development site options on the edge of Exeter. Particular issues are raised regarding the Atwell's Farm site option. Further discussions will be required on a range of matters as the Exeter and Teignbridge Local Plans progress.

A copy of the response letter is appended to the agenda for noting the urgent matter.

7 **Urgent Decision - Delegated Decision**

To note the urgent Delegated Decision taken under the Council's Finance Regulations, to create a budget for expenditure to be incurred as part of the Government's and Council's work to address rough sleeping, in particular, as a response to the greater risk to people experiencing homelessness as a result of the pandemic. The Council has bid for Homes England Capital funds of £1.7M with a proportionate capital contribution of £1.532M from un-ring-fenced S106

funds for affordable housing. The Council has also bid for a complimentary revenue grant bid from central government. The expenditure budget is from uncommitted S106 funds with no impact on the council's General Fund Balance.

This decision was made by the Deputy Chief Executive under the Council's Scheme of Delegation to make urgent decisions and in consultation with the Portfolio Holder for City Development. In accordance with Standing Orders 13, 16 and 17, the Chair of Strategic Scrutiny Committee, the Deputy Leader and Portfolio Holder for Council Housing Development and the Portfolio Holder for Supporting People and Deputy Chair of Planning agreed that this was an urgent decision.

8 **Air Quality Annual Status Report**

To consider the report of the Director Net Zero Exeter & City Management. (Pages 31 - 138)

9 **Review of the Council's Contaminated Land Strategy**

To consider the report of the Director Net Zero Exeter & City Management. (Pages 139 - 168)

Part II: Items suggested for discussion with the press and public excluded

No representations have been received in respect of the following items in accordance with the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

10 **Belle Isle Depot**

To consider the report of the City Surveyor. (Pages 169 - 172)

Date of Next Meeting

The next scheduled meeting of the Executive will be held on **Tuesday 5 October 2021** at 5.30 pm in the Civic Centre.

A statement of the executive decisions taken at this meeting will be produced and published on the Council website as soon as reasonably practicable.

Find out more about Exeter City Council services by looking at our web site <http://www.exeter.gov.uk>. This will give you the dates of all future Committee meetings and tell you how you can ask a question at a Scrutiny Committee meeting. Alternatively, contact the Democratic Services Officer (Committees) on (01392) 265115 for further information.

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EXECUTIVE

Tuesday 6 July 2021

Present:

Councillor Bialyk (Chair)

Councillors Wright, Foale, Ghusain, Harvey, Morse, Sutton and Wood

Apologies:

Councillors Pearson and Williams

In attendance:

Councillor A. Leadbetter (as an opposition group Leader)

Councillor D. Moore (as an opposition group Leader)

Also present:

Chief Executive & Growth Director, Director Net Zero Exeter & City Management, Corporate Manager Democratic and Civic Support, Deputy Chief Finance Officer, City Surveyor, Liveable Exeter Programme Director and Interim City Development lead, Active & Healthy People Programme Lead and Democratic Services Officer (HB)

52

MINUTES

The minutes of the meeting held on 1 June 2021, were taken as read, approved and signed by the Chair as a correct record.

The Chair, in responding to an issue in respect of Min. No. 48 raised by Councillor D. Moore, speaking as an opposition leader, undertook to ensure her point was recorded – see below.

Councillor D. Moore's questions at Executive on 1 June 2021 had been correctly set out in the appendix to those minutes. The second question, the accuracy of which was the point at issue, is set out below taken from the appendix:-

"The officer confirmed that the Council's Development Company Exeter City Living will be included in the Local Plan process in the same way as any other developer. Please can the Portfolio Holder clarify the status of the Liveable Exeter programme in relation to the development of the Local Plan and how the role of Council as leading this programme will be managed distinct from the Council's role as planning authority?"

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DECLARATIONS OF INTEREST

No declarations of disclosable pecuniary interests were made.

54

QUESTIONS FROM THE PUBLIC UNDER STANDING ORDER NO. 19

No questions from members of the public were received.

55

GENERAL FUND CAPITAL MONITORING 2020/21 AND REVISED CAPITAL PROGRAMME FOR 2021/22 AND FUTURE YEARS

The Executive received the report on the Council's overall financial performance of for the 2020/21 financial year. The report also sought approval for the 2021/22

revised capital programme and its commitments, which had been carried forward from 2020/21.

The Deputy Chief Finance Officer made particular reference to:-

- the restrictions implemented in response to the Covid-19 Pandemic had a significant impact on delivery of the programme during the year, as a result the total General Fund capital expenditure was £27.6 million during 2020/21 against a £71 million programme, with the majority of balances carried forward to future years; and
- the Next Steps Accommodation Programme which had enabled a number of properties to be acquired to accommodate rough sleepers..

RECOMMENDED that Council approve: -

- (1) the overall financial position for the 2020/21 annual capital programme; and
- (2) the amendments and requests for further funding to the Council's annual capital programme for 2021/22.

56

OVERVIEW OF GENERAL FUND REVENUE BUDGET 2020/21

The Executive received the report on the overall financial position of the General Fund Revenue Budget for the 2020/21 financial year. The report further sought approval for the General Fund working balance, a number of supplementary budgets and the creation of new earmarked reserves.

The Deputy Chief Finance Officer made particular reference to:-

- an overall net transfer to Earmarked Reserves of £23.9 million with reserves significantly higher than most years most notably due to the setting aside of £17.4 million in respect of business rates;
- the decisive action taken by the Council in July 2020 in passing an Emergency Budget along with additional funding and compensation schemes provided by the Government in response to the Covid-19 Pandemic, had enabled the Council to set aside one-off amounts of:-
 - £4 million to protect the Council against income volatility during 2021/22;
 - £1 million to address the Council's Net Zero ambitions; and
 - £1 million to support the Council as a client of Exeter City Living to help bring forward sites for housing developments.

Councillor Vizard attended the meeting and spoke on this item having given notice under Standing Order No 44.

Councillor Vizard referred to the concerns of residents in respect of the fencing off of a part of Bull Meadow Park as a result of South West Water seeking to transfer its responsibility for the maintenance of the culvert in the Park.

The Director Net Zero Exeter and City Management confirmed that South West Water (SWW) were seeking to divest their responsibilities of certain public surface water sewers on to landowners in the city, the one running through the Park being one of those in dispute with the Council. The Council has robustly defended its position by providing evidence to show that the culvert was a public surface water

sewer paid for by public money and constructed under the Public Health Act. Negotiations with SWW were progressing in respect of a scheme to abandon the section of a poor condition culvert in the Park to enable the whole of the Park to be accessible to the public again. Pricing details were awaited from South West Water with a 50% contribution being offered by the Council.

RECOMMENDED that Council notes and approves (where applicable):-

- (1) the net transfer of £23,901,227 to Earmarked Reserves as detailed in paragraph 8.11 of the report;
- (2) the supplementary budgets of £5,602,710 and budget transfers as detailed in paragraph 8.13 of the report;
- (3) the Earmarked Reserves at 31 March 2021;
- (4) the Council Tax account and collection rate;
- (5) the outstanding sundry debt, aged debt analysis and debt write-off figures;
- (6) the creditors payment performance; and
- (7) the overall financial position of the Council, the General Fund working balance at 31 March 2021 of £4,696,280.

57

2020/21 HRA BUDGET MONITORING REPORT – OUTTURN

The Executive received the report which advised Members of the major differences between the approved budget and the outturn for the financial year up to 31 March 2021 in respect of the Housing Revenue Account and the Council's new build scheme's revenue and capital budgets.

The Deputy Chief Finance Officer made particular reference to:-

- the outturn position of the HRA showing a significant underspend of £6.8 million for 2020/21 as a result of the HRA not using revenue to fund capital projects in 2020/21, most notably the deferral of £5.2 million of revenue contributions to capital;
- the revenue contribution toward capital financing would still be required in future years, resulting in no overall impact on the Medium Term Financial Plan; and
- capital expenditure of £16.1 million including £7.3 million towards investment in existing stock and £8.8 million investment in the provision of new council homes.

In response to a question from a Member, the Deputy Chief Finance Officer, confirmed that the HRA was a ring fenced account with no cross subsidy to the General Fund.

RECOMMENDED that Council approve (where applicable): -

- (1) the supplementary budgets of £333,000 as detailed in paragraph 8.4 of the report;
- (2) the HRA financial position for 2020/21 financial year; and

- (3) the revision of the HRA Capital Programme to reflect the reported variations detailed in Appendix 4 of the report.

58

TREASURY MANAGEMENT 2020/21

The Executive received the report on the current Treasury Management performance for the 2020/21 financial year and the position of investments and borrowings at 31 March 2021.

The Deputy Chief Finance Officer stated that the outturn position was broadly in line with the original budget rather than the Emergency Budget as the Council's cash flow had not been negatively impacted by the Covid-19 Pandemic, as first feared. This was largely due to Government support measures including the Sales Fees and Charges Compensation Scheme in conjunction with the Council borrowing earlier than planned to secure low interest rates.

Councillor D. Moore, as an opposition leader, enquired whether consideration was given to climate change when reaching decisions on investment opportunities.

The Leader advised that the enquiry should be put separately to officers in order for a response to be provided.

RECOMMENDED that Council note the content of the Treasury Management report.

59

DEPOT RE-LOCATION

The Executive received the report which provided an update on the work undertaken to amalgamate depot functions at Exton Road by relocating Public and Green Spaces functions from their current location at the Belle Isle Depot. The work had also addressed issues at the existing Exton Road facilities and funding was being sought to bring the project forward and appoint a professional team.

The City Surveyor made particular reference to:-

- the update to a previous feasibility study on the efficiency and effectiveness of the Belle Isle Nursery depot with particular regard to the safe working of staff;
- confirmation that the amalgamation of all public realm activity onto the Exton Road depot was deliverable;
- the proposal would also improve the operational efficiency of the Exton Road campus; and
- an indicative budget of £3.5 million with Exeter City Living to be engaged as the delivery agent.

The Portfolio Holder for City Management welcomed the proposal as it would significantly improve working conditions of staff especially after the Health and Safety Executive had identified the Belle Isle site as inappropriate and would ensure improvements in overall operational efficiency.

RECOMMENDED that Council approve the allocation of an indicative budget of £3,500,000 to deliver the Depot relocation and improvements at Exton Road Depot.

**LIVEABLE EXETER – GARDEN COMMUNITIES AND ONE PUBLIC ESTATE
FUNDING AWARDS**

The Executive received the report on the Liveable Exeter programme, which provided a high-level update on recently secured grant funding and approval to spending grant funding to progress the Liveable Exeter programme. The report further sought approval to create new posts within the Liveable Exeter programme team in order to increase capacity to support the progression of the programme utilising the approved funding.

The Project Director Liveable Exeter and Interim City Development Support made particular reference to:-

- the utilisation of two funding opportunities – the Garden Communities capacity funding of £475,000 and One Public Estate funding to progress feasibility and technical work on Marsh Barton;
- the significant contribution the proposal would make to the overall Liveable Exeter Programme including providing additional resources to the Liveable Exeter team;
- aiming to achieve the delivery trajectory for 12,000 homes and communities in line with the 2040 vision;
- contributing towards active and sustainable travel patterns and help the city achieve its Net Zero ambitions; and
- the proposal was also fundamental in supporting the development of the Local Plan.

Councillor D. Moore, as an opposition leader, enquired about the extent of the marketing of the proposals and, in line with Garden City principles established by its founders, asked that consideration be given to how existing neighbours and new community members would be able to actively contribute to the formalisation of plans for the Liveable Exeter sites.

The Portfolio Holder for City Development referring to the recent briefing on the Liveable Exeter Plan asked that this be extended to all Council Members.

RECOMMENDED that Council approve: -

- (1) the successful application and receipt of Garden Communities capacity funding to support the Liveable Exeter programme and a budget of up to £475,000, to be funded by an earmarked reserve, to progress work related to the Liveable Exeter programme;
- (2) the successful application and grant of One Public Estate funding to support the progression of feasibility and technical work on Marsh Barton in line with the Liveable Exeter vision and approval of a budget of up to £150,000, funded by claims to Devon County Council as lead partner, to progress the work; and
- (3) the creation of two new, fixed-term posts within the Liveable Exeter team to be funded utilising a proportion of the Garden Communities capacity funding.

The Executive received the report on the proposed continuation of the Wellbeing Exeter programme and associated governance review alongside the strategy and resource plan for delivering the programme to March 2024.

The Active and Healthy People Programme Lead made particular reference to:-

- Wellbeing Exeter was a partnership of public, voluntary and community sector organisations working together to support the health and wellbeing of individuals and communities, the key strategic funders pooling resources being Devon County Council, Exeter City Council, Sport England and the city's four Primary Care Networks;
- the programme being managed by local delivery partner Devon Community Foundation;
- Sport England had awarded Exeter City Council a lottery funding agreement of £1,759,000 to expand Wellbeing Exeter and embed active lifestyles within the programme as part of the national Local Delivery Pilot scheme, being part of the Exeter and Cranbrook 'Live & Move' programme;
- Wellbeing Exeter had played a key role in the Council's community response during the Covid-19 Pandemic. Resulting from this, the strategic partners had reviewed the programme delivery and committed to a new three year strategy. A key aim for the re-designed Wellbeing Exeter model was to respond to the challenges identified through Covid-19 and deliver a programme that supports those residents and communities suffering the greatest health impact as a result of the Pandemic;
- strategic partners across the city identified the Wellbeing of Exeter residents and communities as one of the key priorities of the Liveable Exeter Place Board in delivering its Covid-19 City Recovery Strategy; and
- the proposals included robust governance arrangements.

Councillor D. Moore, as an opposition leader, welcomed the partnership approach embedded in the proposals. She sought confirmation that financial contributions would be forthcoming prior to the year end to ensure that there would be no delay in the delivery of schemes. In terms of governance arrangements, she referred to the absence of the voluntary sector in the Wellbeing Exeter Commissioning Board and to the role and reporting arrangements of the Liveable Exeter Place Board in the overall structure. She suggested that greater transparency in the governance structure should be provided prior to consideration of the proposals by Council.

Councillor Leadbetter, as an opposition leader, supported the report and, in particular, the recommended governance arrangements. He stated that the level of Member involvement was to be welcomed and that the project would be of great benefit to Exeter and its residents and highlighted the value of partnership working.

During the discussion the following points were made:-

- cross party support for the initiative is welcome;
- the partnership approach has been vital in bringing the scheme to the forefront of the health agenda across the country, in helping change people's lives in Exeter and in attracting additional financial support to the city; and
- through the work of the Community Builders and Community Connectors communities, as well as the lives of residents, have been enriched.

The Chief Executive & Growth Director stated that the Exeter Wellbeing initiative was one of the most impressive projects he had been involved with. The Council's commitment to community support and development had grown exponentially over the years from the engagement of a single community development officer to a £3.4

million investment programme committed to supporting the health of its residents. This commitment to the health agenda was particularly impressive for a District Council, a commitment which had led to the £1.4 million investment by Sport England for the Council to become one of the partners in this pioneering pilot project in promoting active and healthy lifestyles. It was an excellent example of an Asset Based Community Development approach which embraced many partners in helping promote healthy lifestyles in addition to the social prescribing role of GP's.

The Chair referred to the following elements delivered by the Programme:-

- four Primary Care networks covering 17 GP practices in the city referring patients;
- 16 Community Connectors supporting individual residents to improve their wellbeing, expanded to include children and young people 11+ and families;
- 13 Community Builders covering every ward in the city, identifying social resources, stimulating activity and helping those communities to thrive and develop; and
- four Community Physical Activity Organisers supporting individuals and communities to be more active in their everyday life.

The Chair, in commending the governance arrangements, emphasised that Members would be invited to twice annual briefings by the Programme Lead alongside the Portfolio Holders where updates would be provided on the progress of Wellbeing Exeter, its ongoing impact with Members provided with opportunities to engage further with the programme.

RECOMMENDED that Council approve:-

- (1) the recommendations as set out in Appendix 1 of the Wellbeing Exeter Review report;
- (2) the Director Transformation and the Service Lead – Active and Healthy People be granted delegated authority, to enter into a contractually binding agreements with strategic partners to deliver the Wellbeing Exeter programme for 2021-2024;
- (3) the Director Transformation and the Service Lead – Active and Healthy People in agreement with the Portfolio Holder for Communities and Culture be granted delegated authority, to spend earmarked Community Infrastructure Levy (CIL) funds amounting to £794,682 in respect of the Wellbeing Exeter programme from the Neighbourhood Portion of the CIL for the period from 2021 to 2024. This would form part of the full proposed programme budget of £3,385,516 with pooled resources provided by strategic programme partners as follows:
 - Devon County Council (£729,766);
 - Sport England (£1,428,500); and
 - Local Exeter Primary Care Networks (£410,568); and
- (4) the adoption of the new governance proposal for Wellbeing Exeter as set out in Appendix 2 of the report.

OF PRESS AND PUBLIC

RESOLVED that under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting during consideration of the following items on the grounds that they involved the likely disclosure of exempt information as defined in paragraphs 2 and 3 of Part 1, Schedule 12A of the Act.

63

IMPROVEMENTS TO THE RE-CYCLING COLLECTION SERVICE

The Executive received the report on the recommended changes to the refuse and re-cycling service as a result of Covid-19 Pandemic, changes to Government guidance and changes to people's demands on the service.

The Director Net Zero Exeter and City Management explained the rationale for reviewing and proposing a changed re-cycling collection service to that agreed in October 2019 prior to the onset of the Covid-19 Pandemic. As a result of the Pandemic (Min. No. 93 of Executive of 8 October 2019 and Min. No. 14 of Council of 15 October 2019 refer), it had been necessary to take account of the changes in people's shopping, work and re-cycling habits and lessons had also been learnt from the challenges being faced by neighbouring authorities in their collection service. It was considered that the revised service proposed would result in improved environmental outcomes compared to the current service, increasing the Council's re-cycling rate and reducing net carbon emissions. It would also meet the expectations from Government and residents that food waste and, possibly glass, be included in the kerbside re-cycling service.

The Portfolio Holder for City Management, in commending the report, advised that in putting forward the changed scheme, regard had been made to the operational implications for staff and to the opportunities for bringing forward training and developmental schemes for employees.

RECOMMENDED that Council rescind its previous decision (Min. No. 93 of Executive of 8 October 2019 and Min. No. 14 of Council of 15 October 2019 refer) to introduce a weekly kerbside-sort recycling collection, incorporating glass and food waste collections with three weekly refuse collections and adopt the following in its place: -

- (1) to retain fortnightly recycling and residual waste collection services and to provide an additional separate weekly food waste collection service;
- (2) to begin a pilot food waste collection scheme in Autumn 2021 in at least one collection area and to use the productivity information to design the full service roll out;
- (3) to wait for further guidance from the Government on the current consultation process for the consistency of collections, to allow the Council to work towards introducing a glass collection service from the kerbside;
- (4) to continue exploring options to improve MRF reliability and strategic long-term options for MRF capacity in the area;
- (5) the investment of £4,514,010 capital and £483,640 net revenue per annum to achieve the successful roll out of the new service; and

- (6) to continue using the remainder of the previously allocated £200,000 revenue budget to fund the roll out of the service changes including project management, publicity and communications.

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DELIVERY OF NET ZERO

The Executive received the report which sought to establish a new team focussed on internal Carbon Net Zero operations. The team would be established by making changes to the existing Growth and Commercialisation and Corporate Energy teams, which would work in partnership with Exeter City Futures to share best practice and help with the delivery of the Net Zero Exeter 2030 Plan.

The Portfolio Holder for Net Zero welcomed the report emphasising that the provision of additional posts and a supporting revenue budget was key to further assist the Council in meeting its Net Zero Carbon targets. Members agreed that the commitment to change from the top was vital to secure buy-in from the general public in meeting the difficult challenges ahead in combating the impact of climate change. The Council itself therefore had an important role in publicising the changes it had made and would be making in the future.

RECOMMENDED that Council approve:-

- (1) the development of a new Exeter City Council Net Zero team, resulting in the creation of two new temporary posts, amending four permanent posts, and the removal of one vacant post from the structure;
- (2) the allocation of a one-off £1 million budget to support activities to deliver Net Zero within the City Council and across the city. Part of the £1 million budget would fund the two new temporary posts and provide a revenue budget for two years to deliver activity;
- (3) support for the establishment of the Exeter City Futures Delivery Group, to enable best practice to be shared across Exeter City Futures partners to support the delivery the Net Zero Exeter 2030 Plan;
- (4) the establishment of Exeter City Council Net Zero Champions within each service area, to assist in delivering Net Zero within the City Council; and
- (5) the implementation of the new structure by 1 August 2021.

65

AUCTIONEER'S LEASE AT THE LIVESTOCK CENTRE

The Executive received the report which sought consent to surrender the existing lease at the Exeter Livestock Centre and to grant a new lease with a variance on the terms of the lease which would change the gross income thresholds and the percentage of gross income payable to the Council.

RESOLVED that:-

- (1) the Executive Committee noted the contents of the report; and

- (2) the City Surveyor be authorised to agree the new lease and rent reduction as set out in the terms within the report.

(The meeting commenced at 5.30 pm and closed at 6.52 pm)

Chair

The decisions indicated will normally come into force 5 working days after publication of the Statement of Decisions unless called in by a Scrutiny Committee. Where the matter in question is urgent, the decision will come into force immediately. Decisions regarding the policy framework or corporate objectives or otherwise outside the remit of the Executive will be considered by Council on 21 July 2021.

DRAFT

EXECUTIVE

Thursday 8 July 2021

Present:

Councillor Bialyk (Chair)

Councillors Wright, Foale, Ghusain, Harvey, Morse, Sutton and Williams

Apologies:

Councillors Pearson and Wood (Self-isolation - Covid)

In attendance:

Councillor D. Moore (as an opposition group Leader)

Councillor K. Mitchell (as an opposition group Leader)

Also present:

Chief Executive & Growth Director, Director Net Zero Exeter & City Management, Corporate Manager Democratic and Civic Support, Corporate Manager – Executive Support, Assistant Service Lead – Local Plan and Democratic Services Officer (MD)

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DECLARATIONS OF INTEREST

No declarations of disclosable pecuniary interests were made.

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QUESTIONS FROM THE PUBLIC UNDER STANDING ORDER NO. 19

A member of the public, Mr Cleasby submitted the following question, related to Minute No. 72:-

- In addition to the undertaking at paragraph 18 of the proposed consultation charter, will the council commit to publishing an annual report demonstrating the extent of compliance with the charter requirements?

The Council Leader explained that the results of all consultations were published, and enabled members of the public to assess continuously and check if the commitments in the Consultation Charter were being met. As the Council faced significant budget reductions, there were limited, potentially reducing, resources for dealing with consultations and the compilation of an annual report would be an additional and unnecessary burden and a duplication of information that would be available in a more accessible, timely way.

Mr Cleasby asked a supplementary question on whether, in the interest of openness and transparency, if there was another way to show the compliance information, without it being too much of a burden?

The Council Leader responded that the Council maintained openness and transparency and that he understood the concerns. However, he didn't feel it was necessary for himself or Executive Members to instruct the time of officers to undertake additional work. There were a great many things to do in Exeter and the Council was consulting with residents and were committed to being open and transparent but needed to focus on work within the budget restraints.

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EAST DEVON, EXETER, MID DEVON AND TEIGNBRIDGE JOINT STRATEGY: SCOPE, RESOURCING TIMETABLE AND GOVERNANCE

The Executive received the report which sought the formal agreement of the scope, resourcing, timetable and governance arrangements for preparing a non-statutory Joint Strategy for East Devon, Exeter, Mid Devon and Teignbridge Councils. The Joint Strategy was considered to be the most appropriate way of ensuring a co-ordinated approach for addressing strategic issues in the region, following the end of the work on the Greater Exeter Strategic Plan (GESP).

The Assistant Service Lead Local Plans made particular reference to:-

- a previous report was presented to the Executive and Council in December 2020, which approved the involvement of the Council in the Joint Strategy work and the report presented moved the work forward;
- the Strategy would be an informal, non-statutory document whilst the formal planning policy for Exeter would be provided by the Local Plan which was currently being prepared;
- the scope of the Strategy would enable shared resourcing of evidence base which would also support the Local Plan;
- the Strategy would act as a prospectus when bidding for infrastructure funding across the area;
- a consultant would be engaged to prepare the Strategy and to work with officers from each Council enabling officer resources to be concentrated on the production of respective Local Plans, which were a priority for each Council;
- the timetable included public consultation in the summer of 2022 with formal approval in October 2022 and the governance of the project remained within the remit of each authority to approve the document; and
- consistent reports were currently going through each respective Council authority for approval.

Councillor D. Moore, as an opposition leader, welcomed the report which would co-ordinate action across the authorities but questioned if a short period of consultation across the summer holidays on key matter would be sufficient and suggested that the consultation timetable should be reviewed. She asked for information on the position of the LEP in this process which did not have a foreseen role in funding and that its future was in doubt, following the Government's review of the LEP. This was considered a potential risk and which should be brought to the attention of Council.

The Portfolio Holder for City Development thanked the staff involved in the production of the GESP and excellent work that has come from the GESP, which she hoped would remain of value in the production of the Local Plan.

RECOMMENDED that Council support the scope, resourcing, timetable and governance arrangements set out in Section 8 of the report presented at the meeting, for preparing a non-statutory Joint Strategy for East Devon, Exeter, Mid Devon and Teignbridge Councils.

The Executive received the report which explained the commencement of work on the new Exeter Local Plan and sought approval for public consultation on an initial 'Issues' document to explore the scope and topics of the new Local Plan, and some initial concepts regarding future development in the city.

The City Council had a statutory duty to prepare planning policy and the Council's existing principal development plan documents were more than five years old and a

new statutory planning policy was required, which would be provided by the new Exeter Local Plan;

The Assistant Service Lead Local Plans made particular reference to:-

- the first formal stage of producing the Local Plan would be the Issues Consultation,;
- the report included a short brochure setting out the key issues the Local Plan would address including, amongst others, climate emergency, homes, jobs, natural environment, transport and infrastructure;
- the document included the Exeter 2040 Vision for the city,
- the document formalised the approach to meeting housing needs in the city reflecting the Liveable Exeter Strategy which sought to make efficient use of land including brown field sites and improving development quality;
- public consultation was a vital part of the process for preparing the planning policy, to gain insight on local issues and for residents to contribute to the policy and consultation would be held in September for eight weeks which would be in accordance with the emerging Consultation Charter and the Statement of Community Involvement. A further report would be brought back to Executive detailing the responses to the consultation; and
- a formal draft Local Plan would be produced in 2022.

RESOLVED that:-

- (1) the new Local Plan Issues document presented to the meeting be approved as the basis for an eight-week public consultation commencing in September 2021; and
- (2) the Deputy Chief Executive, in consultation with the Council Leader and Portfolio Holder for City Development, be granted delegated authority to agree minor changes to the Local Plan 'Issues' document before it is published for consultation.

70

NEW STATEMENT OF COMMUNITY INVOLVEMENT

The Executive received the report on Exeter's new Statement of Community Involvement (SCI), which was a document that needed to be prepared by all Local Planning Authorities. The document set out how the public, organisations and other interested parties would be involved in planning matters and would replace the existing SCI which was adopted in 2005. The SCI would be published for consultation alongside the Exeter Local Plan 'Issues Consultation' and any amendments following the consultation would be brought back to the Executive and Council for approval.

RESOLVED that:-

- (1) the contents of the draft SCI presented to the meeting be approved for an eight-week consultation commencing in September 2021; and
- (2) the Deputy Chief Executive, in consultation with the Council Leader and Portfolio Holder for City Development, be granted delegated authority to agree minor changes to the draft SCI document before it is published for consultation.

EXETER CIVIC UNIVERSITY AGREEMENT

The Executive received the report on the Exeter Civic University Agreement (CUA), which would formalise Exeter City Council's future relationship with the University of Exeter and endorse formal arrangements with both the University and other key agencies in the city.

The Chief Executive & Growth Director stated that the Agreement was a significant statement of the University's commitment to its role in the life of the city. The University was a major educational institution internationally, having achieved recent ascendancy in world rankings, with the new Vice Chancellor seeking to build on this success. Fundamental to these aspirations was to ensure that the University also played a full role and makes a positive impact on the city and the region.

The Chief Executive emphasised the importance of the city's major institutions working with the Council to complement and enhance the aspirations of the 2040 Vision for the city to deliver key outcomes to make the city more inclusive, sustainable, healthier and delivering a world class education. The commitment and role of Exeter University was key. The University offered world class science and medical research and this expertise not only impacted locally in terms of the Council's Net Zero and Health and Wellbeing initiatives but was also helping build the city's prestige on the world stage. The agreement was a major step forward and would enable Exeter University to work with the Council to support wellbeing and the Net Zero agenda.

During the discussion the following points were made:-

- the importance of acknowledging the University's role in the life of the city such as providing job opportunities for graduates who wished to remain in the south west;
- the importance of developing further the relationships between the Council and all major institutions in the city, needed to be welcomed;
- the need for residents to respond to the recent University questionnaire sent to Exeter's residents asking if people feel connected to the University; and
- welcoming the various strands within the Agreement including health and well-being, culture and tourism.

In response to a question from a Member, the Chief Executive & Growth Director, stated that various committees would be quickly established to develop the strands within the Agreement and that the document was shortly to be put to the Exeter College Council for adoption.

The Chair highlighted the five priority areas set out in the Agreement, which reflected the ambitions of the City Council:-

- Support the sustainable and inclusive growth of the city;
- Deliver a Net Zero Exeter;
- Build a city of Aspiration and Opportunity;
- Support an ambitious culture and tourism offer; and
- Enhance the Health and Wellbeing of our citizens

RECOMMENDED that Council approve:-

- (1) the adoption of the Exeter Civic University Agreement; and

- (2) that further amendments to the Exeter Civic University Agreement be delegated to the Chief Executive & Growth Director in consultation with the Leader of the Council.

72

CONSULTATION CHARTER

The Executive received the report which sought agreement to adopt a Consultation Charter and formalise the Council's commitment to consultation and best practice, while ensuring that there were consistent arrangements in place. The Consultation Charter would also ensure that Exeter communities would have the chance to contribute to proposals for Council policies and decisions.

The Corporate Manager – Executive Support stated that, following report to Executive in February, the draft Consultation Charter had been considered by a Spotlight Review Working Group who had made a valuable input into the proposals with a number of helpful amendments agreed including clarification on the scope of consultations, confirming a minimum of six weeks for all consultations and supporting detailed consultation plan templates, which would accompany all consultations.

Responding to the Chair, the Corporate Manager – Executive Support confirmed that the results of all consultations could be amalgamated into a single document and included on the City Council website.

During the discussion the following points were made:-

- welcome inclusion of accessibility issues within the Charter to ensure everybody had the opportunity to respond; and
- given that Government requires consultations on many issues, should there be additional financial support be lobbied from Government for the consultations.

The Chief Executive & Growth Director highlighted the significant ongoing resource and financial pressures faced by the Council and the need to identify efficiency savings going forward. These pressures had a significant impact on the extent to which resources could be allocated to consultation exercises and other Council services.

RECOMMENDED that Council approve the Consultation Charter.

73

PARLIAMENTARY CONSTITUENCY BOUNDARY REVIEW

The Executive received the report, which set out the suggested response of the views of the Council on the recently published Parliamentary Constituency Boundary Review and its impact on the existing Parliamentary constituency's boundaries and Exeter City area.

Members noted that the current boundaries included parts of Priory, St. Loye's and Topsham City Council wards in the East Devon Parliamentary constituency and that the proposed changes would only affect the Parliamentary constituency boundary's and would not affect local government ward areas.

The Electoral Registration & Returning Officer made particular reference to:-

- the initial proposal of the Boundary Commission would include the whole City Council wards of Priory, St Loye's, and Topsham in a new parliamentary constituency which would stretch as far as Exmouth;
- this extension, particularly in the Priory ward, could be viewed as being too far into the urban area of the city, especially as it included the Royal Devon and Exeter Hospital;
- in addition to the whole of St Loyes and Topsham wards being included, the Council would need to decide whether the whole of the Pinhoe ward rather than Priory should be included as then the three most easterly wards would be part of the new Parliamentary Constituency allowing a contiguous boundary between the City Council and East Devon District Council;
- as almost 25% of Exeter's electorate would be included in the new constituency the name should be the Exmouth and East Exeter Constituency;
- the figures for electorates for both Pinhoe and Priory wards, were taken from March 2020 figures were equal at 6,399;
- the Returning Officer for the current East Devon constituency had no issue with the proposals;
- the closing date for consultation was 2 August 2021 for Members, the public and organisations to respond via the Government website; and
- the Parliamentary timetable in the report, set out the schedule going forward, and that any changes to the law would not be made until late 2023.

The Chair stated that the report before the Executive was for commentary on the process and that the recommendations on proposals to be put to the Boundary Commission would be a matter for Council to discuss on 21 July 2021.

In response to questions from Members, the Electoral Registration & Returning Officer, explained:-

- subject to a Parliamentary Election not being called in the period leading up to consideration of the proposals by the Privy Council in late 2023, the new boundaries would come into effect from 2024; and
- it was understood that legislation required Parliamentary Constituencies to be reviewed during the period of each Parliament to help maintain consistency of electorates across the country. Currently, Parliamentary periods were fixed for five years although Parliament could vote to hold an emergency election.

RECOMMENDED that Council:-

- (1) decides which of either of the Pinhoe or Priory City Council wards should be suggested for inclusion in a revised Parliamentary Constituency to the east of the City;
- (2) suggests that the name of any new parliamentary constituency to the east of the city include a reference to the fact that it included a significant proportion of the city within its boundary, with the suggested name of Exmouth and East Exeter; and
- (3) instructs officers to inform the Boundary Commission for England of its views on the proposals.

The Executive received the report which sought approval to adopt the statutory Food Law and Health and Safety Service Plan 2021-22, which sets out the Council's regulatory function in respect of food safety and health and safety over the forthcoming year.

The Director Net Zero Exeter and City Management explained that the Food Law Plan would show how the Council meets its regularity obligations in respect of food safety and the Health and Safety Services Plan demonstrates arrangements for enforcing health and safety. Particular reference was made to:-

- the Council was generally responsible for non-industrial premises with the Health and Safety Executive being responsible for industrial premises;
- the plans contained service aims and objectives, the 2021/22 action plan and the financial arrangements for providing the service;
- the food safety programme had been affected by the Covid-19 Pandemic with a number of businesses closed or required to undertake Covid secure checks and compliance.
- the Council was supporting the track and trace programme following changes made to national guidance, and the programme intended to catch up with the changes by June 2022;
- the Council was required to recover its food inspection programme by March 2023; and
- additional resources had been brought into the service because of ongoing Covid work paid for by Central Government funding.

The Portfolio Holder for Supporting People thanked the Director and the teams for their hard work during the Pandemic, who had been under considerable pressure and working additional hours.

Members acknowledged and expressed their thanks to the officers for the work that has been undertaken, during very challenging circumstances.

RECOMMENDED that Council:-

- (1) approve the Food Law and Health and Safety Service Plan 2021/22; and
- (2) authorise the Service Lead - Environmental Health and Community Safety to change the plan in the light of national guidance and/or to meet operational needs.

75

FUNERAL SERVICE PROVISION REVIEW 2021

The Executive received the report which sought approval to develop a Columbarium, following a review on the provision of funeral services, which had identified a reduction in the capacity for full body burials at the three Council run sites at Higher, Exwick and Topsham cemeteries. The review highlighted that the current demand would mean that the Council would be unable to carry out full body burials beyond 2025 and addressed the re-design of how the Council undertook the burial of ashes, using the remaining cemetery land in an efficient and respectful way.

The Director Net Zero Exeter and City Management explained that the report set out a business case which demonstrated the viability of constructing a Columbarium in Higher Cemetery which was considered an ideal location and would provide a

pleasant land tranquil location for people to visit the interred ashes of their loved ones.

RECOMMENDED that Council approve the proposed £367,300 Columbarium design, to support the increased demand for cremation services.

76 **LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985 - EXCLUSION OF PRESS AND PUBLIC**

RESOLVED that under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting during consideration of the following item on the grounds that it involved the likely disclosure of exempt information as defined in paragraph's 1 and 2 of Part 1, Schedule 12A of the Act.

77 **MEMBERS' TRAINING**

The Executive received the report which provided an update on the progress of work on the Members' training programme and included Members' attendance records for the various training sessions held since March 2021.

Particular reference was made to:-

- the re-constituted Councillor Development Steering Group, which had been convened to discuss Member training requirements;
- the development of the online Member feedback form, which was issued following each training session;
- the recording of training sessions which were archived for Members to access after the sessions; and
- the appendix which highlighted Members' attendance of the various training sessions held.

In response to a question from Members, the Corporate Manager Democratic and Civic Support, confirmed that Members could access recordings of the training sessions and confirm they have attended a training event.

RESOLVED that the Executive noted the Members' Training report.

(The meeting commenced at 5.30 pm and closed at 6.25 pm)

Chair

The decisions indicated will normally come into force 5 working days after publication of the Statement of Decisions unless called in by a Scrutiny Committee. Where the matter in question is urgent, the decision will come into force immediately. Decisions regarding the policy framework or corporate objectives or otherwise outside the remit of the Executive will be considered by Council on 21 July 2021.

Civic Centre, Paris Street, Exeter, EX1 1JN
www.exeter.gov.uk

Please ask for: George Marshall

Direct Dial: 01392 265413

Email: george.marshall@exeter.gov.uk

Date: 6 August 2021

Dear Sir/Madam

RE: Teignbridge Local Plan Review (Part 2) Site Options Consultation

Thank you for the opportunity to comment on the site options consultation for the Teignbridge Local Plan. This letter provides the response of Exeter City Council. It should be noted that the response has not yet been considered by the Council's Executive. This will take place in September 2021. The response has been discussed by lead Councillors.

The response is split into a series of sections covering various topics.

The duty to cooperate

There are a number of duty to cooperate matters identified in the Teignbridge Local Plan Site Options document. The City Council considers that the following matters are of relevance to the relationship between Teignbridge and Exeter. Most of these are identified in the consultation document.

- The collective response to the climate emergency including through the Devon Carbon Plan;
- Development impact on European designated sites;
- Development strategy and cross boundary mitigation;
- Landscape impact;
- Employment strategy;
- Transport strategy;
- Education strategy;
- Leisure, sports and cultural provision;
- Healthcare provision; and
- Coastal change.

The proposed Joint Strategy for East Devon, Exeter, Mid Devon and Teignbridge offers the potential to explore these matters more comprehensively across the wider area. We look forward to discussing these issues further through evidence and strategy as our respective plan-preparation progresses.

Development strategy

The City Council notes the proposed development strategy for Teignbridge and the inclusion of continued development on the edge of Exeter with the potential to accommodate a further 1,800 homes. It will be vital to continue engagement with the City Council relating to potential developments proposed in this area. Habitat mitigation, landscape impact, infrastructure delivery and wider discussions on housing and employment strategy will be matters requiring further discussion and strategic approaches going forwards.

It should be noted that the development strategy for Exeter is currently set out in the Core Strategy and the Liveable Exeter programme. These documents identify the need to focus development at sustainable locations in the city centre and a series of brownfield sites. As well as enabling sustainable development and minimising the need to travel, development in these locations will also support the protection of the landscape setting area of the city. On this basis, there would be concerns regarding proposals for development on areas of land which, although in Teignbridge, provide part of the landscape setting for the city.

Through the Liveable Exeter programme and, in time, the emerging Local Plan, the City Council is proposing to bring forward significant development in the south west of the city, including at Water Lane and Marsh Barton. The impact of these developments alongside potential site options in Teignbridge on the edge of the city will need to be planned for strategically, recognising cross-boundary impacts.

Employment provision

A key consideration will be coordinated thinking regarding employment provision in Exeter and the fringe of the city in Teignbridge. Additional residential development proposed at Marsh Barton will have an impact on the availability of employment space in Exeter and alternative space will be required to accommodate some of these existing employment uses. Sites which provide an opportunity for further employment development in Teignbridge, close to the south western edge of Exeter would be a welcome strand to wider employment strategy. Such sites would need to be in an appropriate location close to the city, be of a scale to provide sufficient space to viably support the regeneration of Marsh Barton and would need efficient access to the strategic road network. Economic evidence, including the Greater Exeter Economic Development Needs Assessment and the emerging Exeter employment study should support this strategic thinking going forwards to recognise the cross-boundary, functional relationships in the area.

Looking specifically at some of the emerging evidence, Exeter is likely to see potential growth in key transformational sectors such as data analytics, green technology and digital communications, sectors which now form vital elements of the economic development strategy for the city. On this basis, it is considered that there are opportunities for accommodating complementary sectors such as distribution on the proposed employment areas south west of the city in Teignbridge.

Transport provision

If development sites on the edge of Exeter are allocated within the Teignbridge Local Plan, continued joint working with Exeter City Council and Devon County Council should help to ensure that appropriate transport provision is made to mitigate development impact. This work will need

to take account of development proposals in the Liveable Exeter programme and the emerging Local Plan to ensure a coordinated position. Continued discussions should ensure that the concepts set out in the Exeter transport strategy are delivered to promote active and sustainable travel to minimise car trips, help support air quality improvements in the city and play a key role in achieving carbon targets.

Depending on which sites on the edge of Exeter are included in the next stage of the Teignbridge Local Plan, it is likely that in some cases off-site transport provision may be required within the city to help mitigate development impact. If this is the case, appropriate and proportionate developer contributions either through s106 or CIL will be required from developments located in Teignbridge.

Education provision

If development sites on the edge of Exeter are allocated within the Teignbridge Local Plan, it is vital that continued joint working with Exeter City Council and Devon County Council takes place relating to education provision. This will help to ensure that appropriate education provision is made in a coordinated way to take account of development proposals in the Liveable Exeter programme and the emerging Local Plan alongside those developments sites in Teignbridge on the Exeter fringe. Depending on which sites on the edge of Exeter are included in the next stage of the Teignbridge Local Plan, it may be that in some cases off-site education provision may be required within the city of Exeter to help mitigate development impact. If this is the case, appropriate and proportionate developer contributions either through s106 or CIL will be required from development in Teignbridge.

Leisure, sports and cultural provision

The development site options on the edge of Exeter are likely to have impacts on the leisure, sports and cultural facilities in the city because they will look to Exeter for various forms of leisure provision. Given the scale of the residential site options and, in some cases, the limitations caused by local topography, it is unlikely that significant provision could be made on site. Further discussion will therefore need to take place between the Councils to develop an appropriate strategy for providing playing pitches, built leisure and cultural provision. Discussions will need to consider the type of provision required and funding arrangements.

Development sites on the edge of Exeter

The consultation document identifies three residential and three employment sites on the edge of Exeter. All six site options will link functionally with Exeter and therefore further discussions will be required to address a variety of cross-boundary issues. It will be important for development to provide an appropriate mix of uses and local facilities to enable a degree of self-containment whilst acknowledging the functional links with Exeter and the need to travel sustainably to access jobs and higher order services. Development must also be located in a way which protects the landscape setting of Exeter. Each of the sites are addressed in turn below.

Markham's Farm

Development at Markham's Farm is likely to have an impact on the landscape setting of Exeter because of the rising land and ridgelines within the site which contribute to the landscape sensitivity of the area and the existing local designation as an area of great landscape value. Although the setting is already to some extent eroded by the location of the A30, the landscape setting area of Exeter abuts the A30 and the administrative boundary with Teignbridge. The potential for landscape impact and for the site to form a single development in the wider rural area would need to be minimised with careful management. If development were to take place, development on the ridgeline should be avoided in order to minimise landscape impact on the setting of the city.

Development at Markham's Farm is likely to increase the demand for trips into Exeter through Alphington and on Alphington Road. In order to manage this impact in terms of increased journey times, residential amenity and air quality, a comprehensive transport strategy is required to maximise the use of active travel and public transport including park and ride. This should take into account the likelihood of long-term development at Marsh Barton alongside potential transport improvements which Marsh Barton could make in future. Joint work with Devon County Council will be vital here taking account of the existing Exeter transport strategy and emerging Local Cycling and Walking Infrastructure Plan.

Education will be an important consideration for this site. Given the location just to the west of the city, education provision will need to be considered in the context of the existing pupils in Exeter but also development proposals at Marsh Barton and Water Lane as included in the Liveable Exeter programme. Working with Devon County Council, a comprehensive education strategy is required to consider the various development proposals in the wider area. If off-site education was provided, this would need to be funded from the development.

The site options information in the consultation document sets out that local public open space and play areas should be provided on site at Markham's Farm. Existing ECC play areas in the vicinity of the site have limited capacity for additional use or expansion to cater for additional demand and would be too far to be reasonably accessible for residents of these sites. Given this context and the scale of development proposed, on site provision is supported. This should include full play provision for all age groups (i.e. LAPs, LEAPS, NEAPs and MUGAs) following as a minimum standard the recommendations of the Fields in Trust guidance 'Beyond the Six Acre Standard'. Looking more widely, provision of skate facilities should be considered on site; the nearest facilities within Exeter are located at Flowerpots more than 3 km away and there are no plans by ECC to provide skate facilities any closer to the proposed sites. Further consideration will need to be given to the potential for on-site playing pitch provision at Markham's Farm. Additional provision in Exeter within close proximity to the site is not currently planned and therefore a lack of more local provision would lead to a greater need to travel. Depending on active travel routes improving access, pitches could potentially be improved to enable them to accommodate additional demand, however this would be subject to appropriate financial contributions being made by development in this location.

Peamore

Peamore offers the potential for further development to the south west of Exeter. It will be important to provide for a mixture of uses in the area including housing and employment (the adjacent employment site option is noted).

Although the area is located within an area of great landscape value, it is separated from the built up area by the A30 and the land is generally rolling as opposed to steeply rising from Exeter. On this basis, development here would have less of an impact in landscape terms than the other site options. However, the prominent location of Peamore when viewed from the A38 and A379 means the site is visible as a gateway to Exeter. On this basis it will be important to ensure a high quality and distinctive development to promote the status of Exeter as a key regional centre.

A comprehensive package of transport measures will be vital to support the delivery of development at Peamore and the adjacent employment site option. Joint work with Devon County Council will be vital here taking account of the existing Exeter transport strategy. Provision should also build on the strategic highways and active travel provision which is currently being delivered at South West Exeter. Off-site transport provision may be required within the city of Exeter to help mitigate development impact. Appropriate funding would need to be sought from the development towards its delivery.

Education provision for the site would need to be considered in the context of the existing provision in Exeter and the all-through school currently being delivered at South West Exeter. Working with Devon County Council, a wider, comprehensive education strategy is required to consider the various development proposals in the wider area. If off-site education was provided, this would need to be funded from the development.

The site options information in the consultation document sets out that local public open space and play areas should be provided on site at Peamore. Existing ECC play areas in the vicinity of the site have limited capacity for additional use or expansion to cater for additional demand and would be too far to be reasonably accessible for residents of these sites. Given this context and the scale of development proposed, on site provision is supported. This should include full play provision for all age groups (i.e. LAPs, LEAPS, NEAPs and MUGAs) following as a minimum standard the recommendations of the Fields in Trust guidance 'Beyond the Six Acre Standard'. Links to the provision being made at South West Exeter should also be considered. Looking more widely, provision of skate facilities should be considered on site; the nearest facilities within Exeter are located at Flowerpots more than 4 km away and there are no plans by ECC to provide skate facilities any closer to the proposed sites. Further consideration will need to be given to the potential to provide on-site playing pitch provision at Peamore. This should take into consideration the provision being made at South West Exeter. Additional provision in Exeter within close proximity to the site is not currently planned and therefore a lack of more local provision would lead to a greater need to travel. Depending on the improvement of active travel routes, pitches in Exeter could potentially be improved to enable them to accommodate additional demand, however this would be subject to appropriate financial contributions being made by development in this location.

Atwells Farm

Landscape impact is a key concern regarding this site. Previous landscape studies covering this wider area identify that the ridge in this location represents a clear physical and visual barrier for Exeter while there are long views to the site from the west and south west. Together, these factors mean that the site plays an important role in the landscape setting of the city and has a very high visual sensitivity. There are clear linkages between the site and the designated landscape setting area of Exeter which it abuts. Development on this site would negatively impact this landscape

setting and undermine one of the key strands of the development strategy for Exeter – the need to protect the landscape setting of the city.

The topography at Atwells Farm is also likely to have an impact on the potential to deliver high quality, functional active travel on the site; the steep slopes are likely to deter significant mode share for walking and cycling. If these modes do not play a significant role, car travel is likely to be the main mode of travel to and from the site. If this were to be the case, there would be negative impacts on the local highway network including relating to air quality. Were development to take place at Atwells Farm, off-site transport provision may be required within the city which would need to be funded by development.

Education provision would need to be considered in the context of a wider strategy for the city paying particular attention to the emerging development sites from the Liveable Exeter programme. If off-site education was provided, this would need to be funded from the development.

The site options information in the consultation document sets out that local public open space and play areas should be provided on site at Atwells Farm. Existing ECC play areas in the vicinity of the site have limited capacity to cater for additional demand and would be too far to be reasonably accessible for residents of these sites. If the site is included for further consideration, on site provision is therefore supported. This should include LAPs, LEAPS and a MUGA. Furthermore, given that there is limited additional development expected in the local area, an absence of appropriate existing NEAP standard play areas within a reasonable walking distance of the site, and due to the challenging local topography, we would also expect a NEAP to be provided on site.

In summary, the site is not considered appropriate for development and the City Council would not support its inclusion in the Local Plan.

West Exe Business Park, Peamore

As already mentioned, there is a need for further strategic collaboration to cover employment strategy for the city and its fringes. Notwithstanding the need for this work, it is considered that this site could play an important role within this wider strategy.

The site is located on the south-western edge of Exeter and would function as an extension of the existing Peamore industrial estate. It would offer an appropriate location for employment development to meet potential future demand on this side of the city derived from the long term redevelopment proposals for Marsh Barton as set out in the Liveable Exeter programme. This location would be particularly suitable for light industry and logistics which would complement the emerging employment sectors which are set to grow in Exeter.

The site is located in close proximity to the A38 for trips to and from the south. North bound access to the M5 would benefit from improvements and should be considered in the context of long term transport strategy for the wider area including the adjacent Southwest Exeter allocation. The City Council supports the proposals for a park and ride on the A379 corridor. If provision could not be made here, an alternative would need to be investigated elsewhere on this corridor.

The site is located at an important gateway location for the city and therefore development should be of a high quality including appropriate landscape and infrastructure.

Brown's Farm, Splatford

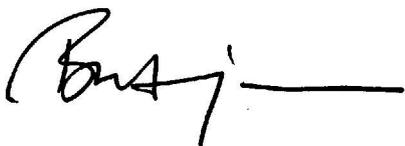
The site is located within 5km south of Exeter and therefore could meet some of the potential future demand on this side of the city derived from the long term redevelopment proposals for Marsh Barton as set out in the Liveable Exeter programme. However, the site is not adjacent to the city and has constraints which limit the scale of development which could be delivered on site. Transport access to and from the A38/M5 to the north and towards the south is fairly direct however access from the southbound A38 is poor and would need improving. Given the location of the site is some distance from larger settlements, accessibility by non-car modes is likely to be challenging. These issues could affect the attractiveness of the site for investment. If the site were to come forward it may be appropriate for light industry and logistics which would complement the emerging employment sectors in Exeter.

Opposite Exeter Court Hotel, Kennford

The site is located within 5km south of Exeter and therefore could meet some of the potential future demand on this side of the city derived from the long term redevelopment proposals for Marsh Barton as set out in the Liveable Exeter programme. However, the site is not adjacent to the city which could affect its attractiveness to businesses. Transport access to and from the A38/M5 to the north and towards the south is fairly direct, however access from the southbound A38 is poor and would need improving. Given the location of the site is some distance from larger settlements, accessibility by non-car modes is likely to be challenging. If the site were to come forward it would be appropriate for light industry and logistics which would complement the emerging employment sectors in Exeter.

I hope these comments are helpful in progressing the Teignbridge Local Plan and we look forward to working with you on the various matters set out in this response. If you have any questions please do not hesitate in contacting me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Bindu Arjoon', followed by a horizontal line.

Bindu Arjoon
Deputy Chief Executive

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REPORT TO EXECUTIVE

Date of Meeting: 7 September 2021

REPORT TO COUNCIL

Date of Meeting: 18 October 2021

Report of: Director – Net Zero and City Management

Title: Air Quality Annual Status Report

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

To present the statutory Annual Status report that has been submitted to the Department of Environment, Food and Rural Affairs (DEFRA). This contains the monitoring data from 2020 and a summary of the actions taken in that year to improve local air quality.

2. Recommendations:

2.1 That Executive Committee notes the statutory annual status report.

2.2 That Council notes the statutory annual status report.

3. Reasons for the recommendation:

3.1 Action on local air quality is a legal duty placed upon the Council (and all district and county councils) by Part IV of the Environment Act 1995. Safeguarding air quality will help reduce any detrimental effects from air pollution on the health and wellbeing of Exeter's population. We are required under this legislation to submit an Annual Status Report to DEFRA using their template and to present the report to members at a local level.

4. What are the resource implications including non financial resources

The City Council will continue to monitor air pollution and report on levels. This will take place within existing resources.

5. Section 151 Officer comments:

5.1 There are no financial implications for Council to consider.

6. What are the legal aspects?

6.1 Part IV of the Environment Act 1995 sets out statutory provisions on air quality. Section 82 provides that local authorities shall review the air quality within their area. Section 83 requires local authorities to designate Air Quality Management Areas (AQMAs) where air quality objectives are not being achieved, or are not likely to be

achieved (i.e. where pollution levels exceed the air quality objectives) as set out in the Air Quality (England) Regulations 2000. Where an area has been designated as an AQMA, Section 84 requires local authorities to develop an Air Quality Action Plan (AQAP) setting out the remedial measures required to achieve the air quality standards for the area covered within the AQMA.

6.2 The Department for Environment, Food and Rural Affairs (DEFRA) has provided statutory guidance in the form of the Local Air Quality Management Policy Guidance (PG16). The guidance gives particular focus to so-called 'priority pollutants' such as Nitrogen Dioxide (NO₂) and so-called 'Particulate Matter' (PM10 and PM2.5) which are relevant to both district and county councils. Local Authorities are required to submit an Annual Status Report (ASR) to the Department for Environment, Food and Rural Affairs in order to report the progress being made in achieving reductions in concentrations of emissions relating to relevant pollutants below air quality objective levels. The completed report is submitted to the Secretary of State (DEFRA) for consideration. DEFRA provide comments back to the Local Authority which the Authority must 'have regard to'.

7. Monitoring Officer's comments:

This report sets out the Council's return that has been submitted to the Department of Environment, Food and Rural Affairs (DEFRA) and as such raises no issues for the Monitoring Officer.

8. Report details:

8.1 There are two national objectives for levels of nitrogen dioxide. These are for the average level over a whole year, which should be below 40 µg/m³, and the average level for one hour, which should not exceed 200 µg/m³ on more than 18 occasions during a year. Local authorities are told that this one hour standard is unlikely to be exceeded where the average level over a whole year is below 60 µg/m³ so this measurement is a commonly used proxy. The annual average objective applies to residential, hospital and education sites. The hourly average objective applies to these sites and to busy streets and workplaces as well.

8.2 Exeter City Council has a monitoring network that is designed to identify the areas with the highest levels of nitrogen dioxide, at the locations where the objectives apply. Most of the monitoring sites are therefore on residential properties in close proximity to the busiest roads and junctions in the city. The results of the monitoring conducted by the City Council is not representative of typical or average conditions across the city. Instead most of the monitoring sites are indicative of the worst case locations.

8.3 The number of sites which exceed the objective has reduced significantly since the AQMA was declared (a reduction from 32 exceedances in 2009 to 6 in 2019). In recent years the annual average objective has not been met at Alphington Street and at some of the monitoring sites along the Heavitree corridor into the city. The highest levels are measured on the Heavitree corridor, at East Wonford Hill. Here levels have historically been close to or above the levels which indicates an exceedance of the hourly objective.

8.4 The measured results for 2020 can be found in table A.3 of the Annual Status Report (appendix 1). Trends in annual nitrogen dioxide concentrations can also be seen in Figure

A.1. These show that in 2020 levels of nitrogen dioxide at every site, including East Wonford Hill fell to below the objective levels. This significant fall was caused by a reduction in traffic flows as a result of COVID-19.

8.5 The reduction in vehicle flows seen during 2020 was exceptional and it is not expected that these falls in air pollution levels will be maintained in their entirety. However it is possible that there have been long term changes in travel habits which will result in permanent changes to pollution levels. This will be evaluated in future reports, looking at the data from 2021 and beyond.

8.6 Some sites have levels between 35 and 40 $\mu\text{g}/\text{m}^3$ (i.e. are close to but not above the objective level of 40). In 2020 this was the case only at East Wonford Hill, with all other sites having levels below 35. Most locations along the busy routes into and around the city had concentrations of nitrogen dioxide in the range between 25 and 35 $\mu\text{g}/\text{m}^3$ during last year.

8.7 As you move away from busy roads, levels in previous years have fallen below 25 $\mu\text{g}/\text{m}^3$. In 2020, levels in these areas were typically between 10 and 15 $\mu\text{g}/\text{m}^3$ for purely suburban streets and between 15 and 20 $\mu\text{g}/\text{m}^3$ for local through routes. The majority of the population of Exeter therefore live in locations with concentrations of nitrogen dioxide well below the objective (especially in 2020), but a small number have previously been exposed at home to levels above the objective. No schools in Exeter experience levels above the objective.

8.8 NO_2 levels in Exeter have at most sites have fallen since a peak in 2009 but have been broadly stable in the four years prior to 2020. 2020 was exceptional, in terms of the reduction in traffic flows during some parts of the year. This resulted in noticeable reductions in nitrogen dioxide concentrations at all sites. Trends in air quality generally take several years to emerge even in normal times, because of the annual variability caused by weather. What the long term impact of COVID-19 will be on air quality is uncertain. As trends do appear, any necessary changes to the AQMA orders or Air Quality Action Plan (AQAP) will be reported in future Annual Status Reports.

8.9 The Annual Status Report also summarises the results of particulate pollution measurements (PM_{10} and $\text{PM}_{2.5}$). No areas in the city are thought to exceed the objectives for this type of air pollution. It should also be noted that local authorities do not have legal duties to achieve the objectives for $\text{PM}_{2.5}$. This responsibility sits with national government in recognition of the fact that the sources of this type of pollution are much less local and may therefore be mainly beyond the local control. It is also worth noting that PM_{10} concentrations have shown a steady decline since 2006.

8.10 The annual status report also summarises the measures that the City Council has taken in the last year to reduce pollution levels, and the actions that will be implemented in the coming year (table 2.2 of the Annual Status Report). Work in this area is also being co-ordinated with Exeter City Futures and the Sport England Local Development Pilot.

9. How does the decision contribute to the Council's Corporate Plan?

9.1 Successful implementation of the Air Quality Action Plan will contribute towards all of the Council's Strategic programmes (promoting active and healthy lifestyles, building

great neighbourhoods and net zero). The collection of reliable air quality data is a vital part of this process, so that the Council and others can understand the scale, location and trends in pollution objective exceedances.

10. What risks are there and how can they be reduced?

10.1 This report is for the information of the Committee only and there are no risks associated with the recommendation to note the contents of the Annual Status Report. There are risks in the implementation of the Air Quality Action Plan, such as funding and the impact of Covid-19. This is acknowledged within the Annual Status Report. Any necessary alterations to the Action Plan can be made by means of future Annual Status Reports.

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage and civil partnership status in coming to a decision.

11.4 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because the report is for information only.

12. Carbon Footprint (Environmental) Implications:

12.1 Measures to improve local air quality will also reduce carbon emissions from transport. The recommendations of this report therefore align with and support the Council's carbon reduction target (carbon neutral by 2030).

13. Are there any other options?

13.1 Completing an Annual Status Report and submitting it to DEFRA is a legal duty.

Director Net Zero and City Management, David Bartram

Author: Simon Lane, Service Lead – Environmental Health and Community Safety
Alex Bulleid, Senior Environmental Technical Officer

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

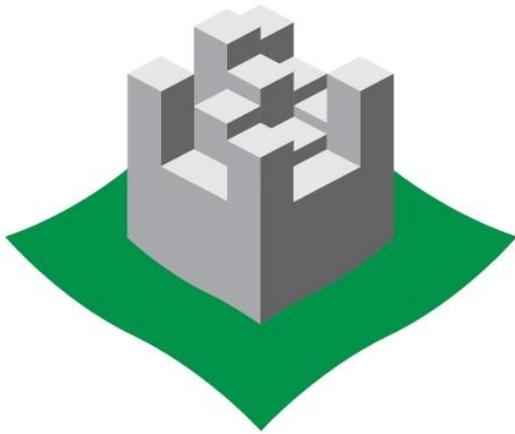
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Exeter
City Council

2021 Air Quality Annual Status Report (ASR)

In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management

Date: June, 2021

Exeter City Council

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Date	June 2021

Executive Summary: Air Quality in Our Area

Air Quality in Exeter

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children, the elderly, and those with existing heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often less affluent areas (Public Health England, Air Quality: A Briefing for Directors of Public Health, 2017 and Defra, Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006).

The mortality burden of air pollution within the UK is equivalent to 28,000 to 36,000 deaths at typical ages (from Defra’s Air quality appraisal: damage cost guidance, July 2020), with a total estimated healthcare cost to the NHS and social care of £157 million in 2017 (Public Health England. Estimation of costs to the NHS and social care due to the health impacts of air pollution: summary report, May 2018).

Public Health England’s Public Health Outcomes Framework tool shows that in Exeter in 2017 the fraction of mortality attributable to particulate air pollution was 4.4%. This is equal to the regional figure for the south west (4.4%) and below the national level of 5.1%. Exeter therefore has levels of particulate matter which are causing harm, but this problem is less severe than in nearly 75% of the country.

Indicator	Period	Exeter		Region		England		England	
		Recent Trend	Count	Value	Value	Value	Worst/ Lowest	Range	Best/ Highest
Fraction of mortality attributable to particulate air pollution	2017	–	-	4.4%	4.4%	5.1%	2.5%		7.1%
Air pollution: fine particulate matter New data	2019	–	-	7.4	7.3	9.0	12.4		3.8

Data from Public Health England

There are two national objectives for levels of nitrogen dioxide. These are for the average level over a whole year, which should be below 40 µg/m³, and the average level for one hour, which should be below 200 µg/m³. It is not easy to measure the average level for one hour, so a proxy has been developed by the Department for Environment, Food and Rural Affairs (DEFRA) which is that the average over a whole year should be below 60 µg/m³. The annual average objective applies to residential, hospital and educational sites.

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The hourly average objective applies to these sites and to busy streets and workplaces as well.

Exeter City Council has a monitoring network that is designed to identify the areas with the highest levels of nitrogen dioxide, at the locations where the objectives apply. Most of the monitoring sites are therefore on residential properties in close proximity to the busiest roads and junctions in the city. The results of the monitoring conducted by the City Council is not generally representative of typical or average conditions across the city. Instead it is indicative of the worst case locations.

In recent years the annual average objective has not been met at a number of places in the city. These are Alphington Street and along the Heavitree corridor into the city. The highest levels are measured on the Heavitree corridor, at East Wonford Hill. Here levels have historically been close to or above the level which indicates an exceedance of the hourly objective.

The measured results for 2020 can be found in table A.3 of this report. Trends in annual nitrogen dioxide concentrations can also be seen in Figure A.1. These show that in 2020 levels of nitrogen dioxide at every site, including East Wonford Hill fell to below the objective levels. This significant fall was caused by a reduction in traffic flows as a result of COVID-19.

Some sites have levels between 35 and 40 $\mu\text{g}/\text{m}^3$ (i.e. are close to but not above the objective level of 40). In 2020 this was the case only at East Wonford Hill, with all other sites having levels below 35. Most locations along the busy routes into and around the city had concentrations of nitrogen dioxide in the range between 25 and 35 $\mu\text{g}/\text{m}^3$ during last year.

As you move away from busy roads, levels in previous years have fallen below 25 $\mu\text{g}/\text{m}^3$. In 2020, levels in these areas were typically between 10 and 15 $\mu\text{g}/\text{m}^3$ for purely suburban streets and between 15 and 20 $\mu\text{g}/\text{m}^3$ for local through routes. The majority of the population of Exeter therefore live in locations with concentrations of nitrogen dioxide well below the objective (especially in 2020), but a small number have previously been exposed at home to levels above the objective. No schools in Exeter experience levels above the objective.

NO₂ levels in Exeter have at most sites have fallen since a peak in 2009 but have been broadly stable in the four years prior to 2020. 2020 was exceptional, in terms of the

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reduction in traffic flows during some parts of the year. This resulted in noticeable reductions in nitrogen dioxide concentrations at all sites. Trends in air quality generally take several years to emerge even in normal times, because of the annual variability caused by weather. What the long term impact of COVID-19 will be on air quality is uncertain. As trends do appear, any necessary changes to the AQMA orders or Air Quality Action Plan (AQAP) will be reported in future Annual Status Reports.

The Annual Status Report also summarises the results of particulate pollution measurements (PM₁₀ and PM_{2.5}). No areas in the city are thought to exceed the objectives for this type of air pollution. Measured PM_{2.5} concentrations were well below the relevant objective level and PM₁₀ concentrations have shown a steady decline since 2006.

The current AQAP covers the period 2019-2024. It was published following a significant consultation and engagement process which reached nearly 3000 people. The plan is available online at [this link](#). Exeter City Council will work with Devon County Council Highways team, neighbouring authorities, Exeter City Futures and Sport England to deliver the measures in this plan.

Actions to Improve Air Quality

Whilst air quality has improved significantly in recent decades, and will continue to improve due to national policy decisions, there are some areas where local action is needed to improve air quality further.

The 2019 DEFRA Clean Air Strategy sets out the case for action, with goals even more ambitious than EU requirements to reduce exposure to harmful pollutants. The Road to Zero (DfT, The Road to Zero: Next steps towards cleaner road transport and delivering our Industrial Strategy, July 2018) sets out the approach to reduce exhaust emissions from road transport through a number of mechanisms; this is extremely important given that the majority of Air Quality Management Areas (AQMAs) are designated due to elevated concentrations heavily influenced by transport emissions.

Key completed actions in 2020 include:

1. Exeter City council has published a Physical Activity Strategy, underpinned by a communications strategy which was tested during the COVID 19 pandemic. The strategy focusses on getting the least active members of the community moving more (including active travel) with a key focus being to increase active travel. It also

prioritises development projects for the Wonford Health & Wellbeing Centre and Exeter Arena Sports Village. Both projects are aimed at increased cycling and promoting active travel in everyday life.

2. In 2020, a consultation in the Newtown area engaged with the local community to discuss and explore perceptions towards walking and cycling. This initial consultation along with baseline research work will be expanded over 2021 to include a further consultation on specific highway improvements/interventions that enable and encourage more people to use active travel modes within the Newtown area.
3. The Sport England Local Delivery Pilot team has developed the governance and application structure for communities to be able to implement localised regular closures of roads within their neighbourhoods. For specific periods, this will provide sections of roads where the priority will be given to activity (play) rather than travel as such the number of vehicles moving during this time will be reduced. The SELDP team was also involved in the school streets projects discussed in point 11 below.
4. The Council has radically altered the way in which staff work as a result of the pandemic, which has accelerated a move toward home and agile working that is expected to remain. This will reduce staff travel to work in the long term, not just during the pandemic restrictions.
5. Extension of the Council's monitoring network to include 3 new sites representative of exposure in city centre locations. Exceedances of the objective are not expected at any of these sites, but they do expand understanding of concentrations away from the identified hot spots.
6. Work started on site at Water Lane, where the Council is building a large solar array with battery storage which would be able to power a fleet of electric refuse collection vehicles.
7. Scrutiny of planning applications for air quality impacts, including making objections to developments on air quality grounds where this is justified and the negotiation of mitigation in accordance with Council and national planning policy.

8. From 1st Jan 2020 adopted policy required the Hackney carriage fleet to be 50% Euro 6 wheelchair accessible vehicles and 50% ULEV saloon cars with a stated emission level of 75g km CO₂ or below. This policy continues to be implemented.
9. A reduction in NOx emissions from buildings as a result of a variety of measures intended primarily to address fuel poverty and carbon emissions. These include progressing plans for the next phase of PassivHaus standard homes by Exeter City Council, construction of an Extra Care facility and a leisure centre and swimming pool both meeting the PassivHaus standard and continued implementation of district heating schemes to provide heating and hot water to 2800 homes at Monkerton, Tithebarn, Mosshayne, Pinn Court and Park Farm, and Exeter Science Park.
10. Work on the new bus station continued, which will provide improved facilities for public transport users in the city.
11. The City Council is partners with Devon County Council and Co Delivery in a scheme which secured £80,000 of grant monies from the Department for Transport Energy Saving Trust to expand the capabilities of e-cargo bikes for business travel. Nine electric cargo bikes have been secured for use within the partner organisations, Devon County Council, Exeter City Council, University of Exeter and Royal Devon & Exeter NHS Foundation Trust (RD&E). The City Council has three bikes which are used by the Environmental Health and Community Safety team to replace vehicle trips. An additional four bikes will be used to expand the eCargo Co Delivery courier service in Exeter, enabling more businesses to deliver goods across the city sustainably. This pilot project seeks to encourage the transition to carbon neutral modes of business travel. It's estimated the scheme will help to save more than 20,000 miles a year that are currently made by petrol and diesel vehicles.
12. Pop up measures to facilitate social distancing and active travel were introduced in 2020. The changes include the introduction of a new 5km cross city route (E9 Newcourt/Pynes Hill to City centre), supplemented with new crossings (eg at Russell Way). Some of these pop-up measures have already been made permanent, such as the Homefield Road modal filter in Heavitree
13. New school streets trialled at Whipton Barton School and Redhills. Whipton Barton is to be made permanent and a trial will also be done at Ladysmith School in 2021.

14. Publication by Devon County Council of a new Transport Strategy with three themes:

Greater Connectivity: Focusing on travel into the city from outside, this theme will provide a consistent standard of frequency of both rail and interurban bus routes and deliver strategic cycle trails between key settlements. To capture those from the rural hinterland with limited sustainable travel choices, there will be a Park and Ride on all key corridors into the city.

Greater Places for People: This focuses on increasing the number of trips made on foot or by bike within the city and urban bus corridors. This will be done through enhancing pedestrian/cycling networks to connect residential areas and villages on the edge of the city to economic hubs, reallocating road space for walking and cycling, creating more attractive public spaces and working with operators to provide a reliable low carbon network of buses.

Greater Innovation: DCC will work with private sector partners to test and implement innovative technology solutions to make travel easier, encourage mode shift and help the city's transport networks operate more flexibly and efficiently. A key aspiration will be the development of a new zero emission transport subscription service. This platform will join up an electric vehicle car club, the UK's largest on street electric cycle hire network and proposed low carbon bus services.

Key targets within the strategy include:

- 50% of trips by foot or cycle within the city;
- Removal of air quality exceedances in the city.

15. Work completed on a new Park and Change site at the Science Park. However this will not be opened until Government advice not to use public transport is lifted.
16. Work commenced on a new station at Marsh Barton.
17. Work has commenced to re-open the Okehampton railway line to daily services. This will provide a valuable alternative to car travel for people coming into the city from the area north of Dartmoor and increased service frequency from Crediton.
18. The local Co-Cars car club now includes 30 cars, 5 of which are electric. Car Clubs have been impacted by social distancing requirements, but is expected to expand

the scheme further in 2021 with more electric car clubs as part of the Rapid Charging Exeter project.

19. Continued expansion of Co-Bikes (the local on-street e-cycle hire scheme) and usage of the network has increased by more than 500%. In last 12 months, Devon County Council and Co-Bikes have significantly increased the city network with new docking stations at Ikea, Sidwell St and Cowick St and expanded charging stations at County Hall and Cranbrook.(in total an extra 30 docks). They have also trialled new dockless sites to provide additional capacity alongside the growing docked network (Magdalen Road, Digby Park and Ride and Topsham). Over the next year further expansion will take place and additional bikes will be put in.
20. Further development of the cycle network in and around the city, particularly route E4. Construction on Pinhoe Road, Exhibition Way, Exhibition Fields and new bridge over Summer Lane were completed and design work for Stoke Hill and Union Road is progressing.
21. New cycle parking provision in the city's parks and open spaces (funded by DCC).
22. DCC continued to undertake aspects of residential Travel Planning such as were consistent with social distancing requirements. Staff have engaged a total of around 1600 homes so far. Visits to homes will re-commence in 2021.

Progress on the following measures has been slower than expected due to:

- Delays to the adoption of the GESP. The Transportation Strategy describes what the future of transport in Exeter should look like, but without a matching local plan in all the District Council areas, the necessary contributions and infrastructure will have to be negotiated on a site by site basis as each application is decided.
- Science Park Park & Change. This has not yet opened because of restrictions on use of public transport. It is expected to open in 2021.
- Use of public transport has reduced significantly as a result of the pandemic. The future of public transport and the measures needed to encourage passengers back safely will be considered in 2021 and beyond.
- Home visits as part of the DCC Residential Travel Planning service were paused in 2020. They will restart in 2021.

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Exeter City Council will continue to work with partners on implementing the actions in the AQAP over the course of the next reporting year, particularly:

- Implementation of the agreed programme of Sport England work.
- Further development of the net zero plan for Exeter, in conjunction with Exeter City Futures.
- Implementation of the Transport Strategy by DCC.
- Further improvements to the E4 cycle route linking the new development areas at Monkerton, Tithebarn and Cranbrook with the University. This will make it safer and easier to make journeys by bike.
- New Park and Change sites, the new station at Marsh Barton and the re-opening of the Okehampton rail line for daily services. This will provide sustainable and active travel options for those travelling in to the city from outside and those travelling locally within it.

Conclusions and Priorities

No exceedances of the objective levels were measured at any sites in Exeter in 2020. The impact of the reduction in traffic flows as a result of COVID-19 can be seen as a significant fall in NO₂ concentrations at all monitoring sites. Concentrations are expected to rise again in 2021 so no changes to the AQMA are proposed at this stage.

Exeter City Council's priorities for the coming year are to continue to progress the AQAP, in conjunction with the development of the city and county's Climate Emergency plans and in the context of Covid-19 recovery.

The principal challenges and barriers to implementation that Exeter City Council anticipates facing are further funding constraints within Local Government, available officer time, and public, business and political appetite for measures that may be perceived as potentially harming or delaying economic recovery (even if this is not the case).

Local Engagement and How to get Involved

Local air pollution currently has a high profile within the city. For example it is one of Exeter City Futures 12 goals, nearly 3000 people were involved in the consultation on the

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current AQAP and Devon County Council have committed in their Transportation Strategy to resolve exceedances of the objective.

Exeter City Futures welcomes proposals from community and interest groups who wish to improve air quality in their local area. The Wellbeing Exeter Community Builders are actively engaging with local communities to increase active travel, social inclusion, improve the public realm for walking and cycling and benefit air quality.

Further enquiries about pollution levels and actions to improve air quality should be made to environmental.health@exeter.gov.uk.

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1 Local Air Quality Management

This report provides an overview of air quality in Exeter during 2020. It fulfils the requirements of Local Air Quality Management (LAQM) as set out in Part IV of the Environment Act (1995) and the relevant Policy and Technical Guidance documents.

The LAQM process places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether or not the air quality objectives are likely to be achieved. Where an exceedance is considered likely the local authority must declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in pursuit of the objectives. This Annual Status Report (ASR) is an annual requirement showing the strategies employed by Exeter City Council to improve air quality and any progress that has been made.

The statutory air quality objectives applicable to LAQM in England are presented in Table E.1.

2 Actions to Improve Air Quality

2.1 Air Quality Management Areas

Air Quality Management Areas (AQMAs) are declared when there is an exceedance or likely exceedance of an air quality objective. After declaration, the authority should prepare an Air Quality Action Plan (AQAP) within 12 months setting out measures it intends to put in place in pursuit of compliance with the objectives.

A summary of AQMA declared by Exeter City Council can be found in Table 2.1. The table presents a description of the AQMA that is currently designated within the city.

Appendix D: Map(s) of Monitoring Locations and AQMAs provides maps of the AQMA and also the air quality monitoring locations in relation to the AQMA.

The air quality objectives pertinent to the current AQMA designation are as follows:

- NO₂ annual mean;
- NO₂ 1-hour mean.

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Table 2.1 – Declared Air Quality Management Areas

AQMA Name	Date of Declaration	Pollutants and Air Quality Objectives	One Line Description	Is air quality in the AQMA influenced by roads controlled by Highways England?	Level of Exceedance: Declaration	Level of Exceedance: Current Year	Name and Date of AQAP Publication	Web Link to AQAP
Exeter AQMA	Declared 2007, Amended 2011	NO2 Annual Mean	An area encompassing the radial routes into the city and other major routes	NO	70 µg/m ³	N/A	Exeter AQAP 2019-2024	www.exeter.gov.uk/airpollution
Exeter AQMA	Declared 2007, Amended 2010	NO2 1 Hour Mean	An area encompassing the radial routes into the city and other major routes	NO	65 µg/m ³	N/A	Exeter AQAP 2019-2024	www.exeter.gov.uk/airpollution

Exeter City Council confirm the information on UK-Air regarding their AQMA(s) is up to date.

Exeter City Council confirm that all current AQAPs have been submitted to Defra.

2.2 Progress and Impact of Measures to address Air Quality in Exeter

Defra's appraisal of last year's ASR concluded 'the report is well structured, detailed, and provides the information specified in the Guidance' and goes on to the following bullet points:

1. The Council have provided a detailed update on progress made on their AQAP measures. They have discussed which key measures have been completed within the reporting year and what barriers to implementation they anticipate facing in the coming year with respects to there other measures. The Council anticipate funding to be the main barrier to implementation. The Council are encouraged to continue providing updates to their measure so that progress can be easily tracked.
2. There have been ten new diffusion tube sites added to the monitoring network in 2019 and a further three have been added in 2020. The 10 new tubes added in 2019 are located in areas where new housing is being developed. It is encouraging to see that the Council are mindful of the potential impact new developments may have on air quality. The Council have continued to demonstrate that they are taking an active approach to reviewing and amending their monitoring program where deemed appropriate. The Council are encouraged to do this on a regular basis to ensure monitoring is taking place at all areas of potential exceedance at locations of relevant exposure.
3. The Council have provided a very clear and concise discussion on pollutant trends within the city. Comparisons in NO₂ concentrations have been made between reporting years and the Council have not only considered the impacts of anthropogenic activities (i.e. emissions from roads) but also the impacts of meteorological variation on air quality. This is encouraging to see and demonstrates the Council's wider understanding on the various factors that may influence air quality.
4. It would be beneficial for the Council to also present diffusion tube concentrations in graphs. It is appreciated at the Council have many monitoring locations, so focus could be made in presenting NO₂

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concentrations only within the AQMA. This way NO₂ trends within the AQMA can be made visual and easier to understand for the reader.

Graphs for all monitoring sites have been included in addition to data tables in this year's report.

Exeter City Council has taken forward a number of direct measures during the current reporting year of 2020 in pursuit of improving local air quality. Details of all measures completed, in progress or planned are set out in Table 2.2. Seventeen measures are included within Table 2.2, with the type of measure and the progress that the council and partners have made during 2020. Where there have been, or continue to be, barriers restricting the implementation of the measure, these are also presented within Table 2.2.

More detail on these measures can be found in the Air Quality Action Plan, Physical Activity Strategy and Transportation Strategy. Key completed measures are:

1. Exeter City council has published a Physical Activity Strategy, underpinned by a communications strategy which was tested during the COVID 19 pandemic. The strategy focusses on getting the least active members of the community moving more (including active travel) with a key focus being to increase active travel. It also prioritises development projects for the Wonford Health & Wellbeing Centre and Exeter Arena Sports Village. Both projects are aimed at increased cycling and promoting active travel in everyday life.
2. In 2020, a consultation in the Newtown area engaged with the local community to discuss and explore perceptions towards walking and cycling. This initial consultation along with baseline research work will be expanded over 2021 to include a further consultation on specific highway improvements/interventions that enable and encourage more people to use active travel modes within the Newtown area.
23. The Sport England Local Delivery Pilot team has developed the governance and application structure for communities to be able to implement localised regular closures of roads within their neighbourhoods. For specific periods, this will provide sections of roads where the priority will be given to activity (play) rather than travel as such the number of vehicles moving during this time will be reduced. The SELDP team was also involved in the school streets projects discussed in point 11 below.

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24. The Council has radically altered the way in which staff work as a result of the pandemic, which has accelerated a move toward home and agile working that is expected to remain. This will reduce staff travel to work in the long term, not just during the pandemic restrictions.
25. Extension of the Council's monitoring network to include 3 new sites representative of exposure in city centre locations. Exceedances of the objective are not expected at any of these sites, but they do expand understanding of concentrations away from the identified hot spots.
26. Work started on site at Water Lane, where the Council is building a large solar array with battery storage which would be able to power a fleet of electric refuse collection vehicles.
27. Scrutiny of planning applications for air quality impacts, including making objections to developments on air quality grounds where this is justified and the negotiation of mitigation in accordance with Council and national planning policy.
28. From 1st Jan 2020 adopted policy required the Hackney carriage fleet to be 50% Euro 6 wheelchair accessible vehicles and 50% ULEV saloon cars with a stated emission level of 75g km CO₂ or below. This policy continues to be implemented.
29. A reduction in NOx emissions from buildings as a result of a variety of measures intended primarily to address fuel poverty and carbon emissions. These include progressing plans for the next phase of PassivHaus standard homes by Exeter City Council, construction of an Extra Care facility and a leisure centre and swimming pool both meeting the PassivHaus standard and continued implementation of district heating schemes to provide heating and hot water to 2800 homes at Monkerton, Tithebarn, Mosshayne, Pinn Court and Park Farm, and Exeter Science Park.
30. Work on the new bus station continued, which will provide improved facilities for public transport users in the city.
31. The City Council is partners with Devon County Council and Co Delivery in a scheme which secured £80,000 of grant monies from the Department for Transport Energy Saving Trust to expand the capabilities of e-cargo bikes for business travel. Nine electric cargo bikes have been secured for use within the partner organisations, Devon County Council, Exeter City Council, University of Exeter and Royal Devon & Exeter NHS Foundation Trust (RD&E). The City Council has three

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bikes which are used by the Environmental Health and Community Safety team to replace vehicle trips. An additional four bikes will be used to expand the eCargo Co Delivery courier service in Exeter, enabling more businesses to deliver goods across the city sustainably. This pilot project seeks to encourage the transition to carbon neutral modes of business travel. It's estimated the scheme will help to save more than 20,000 miles a year that are currently made by petrol and diesel vehicles.

32. Pop up measures to facilitate social distancing and active travel were introduced in 2020. The changes include the introduction of a new 5km cross city route (E9 Newcourt/Pynes Hill to City centre), supplemented with new crossings (eg at Russell Way). Some of these pop-up measures have already been made permanent, such as the Homefield Road modal filter in Heavitree
33. New school streets trialled at Whipton Barton School and Redhills. Whipton Barton is to be made permanent and a trial will also be done at Ladysmith School in 2021.
34. Publication by Devon County Council of a new Transport Strategy with three themes:

Greater Connectivity: Focusing on travel into the city from outside, this theme will provide a consistent standard of frequency of both rail and interurban bus routes and deliver strategic cycle trails between key settlements. To capture those from the rural hinterland with limited sustainable travel choices, there will be a Park and Ride on all key corridors into the city.

Greater Places for People: This focuses on increasing the number of trips made on foot or by bike within the city and urban bus corridors. This will be done through enhancing pedestrian/cycling networks to connect residential areas and villages on the edge of the city to economic hubs, reallocating road space for walking and cycling, creating more attractive public spaces and working with operators to provide a reliable low carbon network of buses.

Greater Innovation: DCC will work with private sector partners to test and implement innovative technology solutions to make travel easier, encourage mode shift and help the city's transport networks operate more flexibly and efficiently. A key aspiration will be the development of a new zero emission transport subscription service. This platform will join up an electric vehicle car club, the UKs largest on street electric cycle hire network and proposed low carbon bus services.

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Key targets within the strategy include:

- 50% of trips by foot or cycle within the city;
- Removal of air quality exceedances in the city.

35. Work completed on a new Park and Change site at the Science Park. However this will not be opened until Government advice not to use public transport is lifted.
36. Work commenced on a new station at Marsh Barton.
37. Work has commenced to re-open the Okehampton railway line to daily services. This will provide a valuable alternative to car travel for people coming into the city from the area north of Dartmoor and increased service frequency from Crediton.
38. The local Co-Cars car club now includes 30 cars, 5 of which are electric. Car Clubs have been impacted by social distancing requirements, but is expected to expand the scheme further in 2021 with more electric car clubs as part of the Rapid Charging Exeter project.
39. Continued expansion of Co-Bikes (the local on-street e-cycle hire scheme) and usage of the network has increased by more than 500%. In last 12 months, Devon County Council and Co-Bikes have significantly increased the city network with new docking stations at Ikea, Sidwell St and Cowick St and expanded charging stations at County Hall and Cranbrook.(in total an extra 30 docks). They have also trialled new dockless sites to provide additional capacity alongside the growing docked network (Magdalen Road, Digby Park and Ride and Topsham). Over the next year further expansion will take place and additional bikes will be put in.
40. Further development of the cycle network in and around the city, particularly route E4. Construction on Pinhoe Road, Exhibition Way, Exhibition Fields and new bridge over Summer Lane were completed and design work for Stoke Hill and Union Road is progressing.
41. New cycle parking provision in the city's parks and open spaces (funded by DCC).
42. DCC continued to undertake aspects of residential Travel Planning such as were consistent with social distancing requirements. Staff have engaged a total of around 1600 homes so far. Visits to homes will re-commence in 2021.

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Exeter City Council will continue to work with partners on implementing the actions in the AQAP over the course of the next reporting year, particularly:

- Implementation of the agreed programme of Sport England work:
 - Supporting Ride-On cycling to deliver free public Dr-Bike sessions in the City Centre, enabling members of the public to get a bike maintenance check and therefore ride it more frequently;
 - Delivering 5 Cycle Celebration events across the city (and Cranbrook). These events will enable members of the community to try cycling, to re-engage with cycling or to just meet up with other people around the shared aspect of community activity. The longer-term output of these events will be to inspire the community to take up cycling or perhaps return to cycling, thereby having the potential to reduce the number of local journeys made by car.
 - Tour of Britain – by supporting a stage of this cycling event in Exeter we will be helping to inspire the next generations of cyclists and also encourage greater participation within the sport through our connections with British Cycling.
- Further development of the net zero plan for Exeter, in conjunction with Exeter City Futures.
- Implementation of the Transport Strategy by DCC.
- Further improvements to the E4 cycle route linking the new development areas at Monkerton, Tithebarn and Cranbrook with the University. This will make it safer and easier to make journeys by bike.
- New Park and Change sites, the new station at Marsh Barton and the re-opening of the Okehampton rail line for daily services. This will provide sustainable and active travel options for those travelling in to the city from outside and those travelling locally within it.

Exeter City Council's priorities for the coming year are to continue to progress the AQAP, in conjunction with the development of the city and county's Climate Emergency plans and in the context of Covid-19 recovery.

The principal challenges and barriers to implementation that Exeter City Council anticipates facing are further funding constraints within Local Government, available officer

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time, and public, business and political appetite for measures that may be perceived as potentially harming or delaying economic recovery (even if this is not the case).

Progress on the following measures has been slower than expected due to:

- Delays to the adoption of the GESP. The Transportation Strategy describes what the future of transport in Exeter should look like, but without a matching local plan in all the District Council areas, the necessary contributions and infrastructure will have to be negotiated on a site by site basis as each application is decided.
- Science Park Park & Change. This has not yet opened because of restrictions on use of public transport. It is expected to open in 2021.
- Use of public transport has reduced significantly as a result of the pandemic. The future of public transport and the measures needed to encourage passengers back safely will be considered in 2021 and beyond.
- Home visits as part of the DCC Residential Travel Planning service were paused in 2020. They will restart in 2021.

Exeter City Council anticipates that the measures stated above and in **Error! Reference source not found.** will achieve compliance in the Exeter AQMA although the full impact of Covid-19 and recovery (including financial pressures on local authorities) is not yet understood. Progress with implementing the priority measures and all the actions listed in Table 2.2 will be reported on in the next Annual Status Report in 2022 and changes can be made to the AQAP if required by the mechanism of future ASRs

Table 2.2 – Progress on Measures to Improve Air Quality

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
1 (green measure)	Filtered permeability projects to be considered for the city with an initial focus on the Heavitree corridor area and including a feasibility study for corridor improvements	Policy Guidance and Development Control	Other policy	2019	Rolling Programme	DCC via Transport Strategy and Exeter City Futures, Sport England Local Delivery Pilot	SELDP, DCC, Developer Contributions, Grant Funding where available and ECC	NO	Partially Funded	£50k - £100k	Implementation	The target for design of changes to the Heavitree corridor area will be to eliminate exceedences. Details will be finalised as the design emerges, but it is currently expected that a reduction in emissions of between 39 and 78% will be required	Implementation of scheme(s)	Pop up cycle routes and road closures in Heavitree and around the RD&E hospital were introduced in 2020 and have already been made permanent in some cases. A trial School Street at Ladysmith school commenced in 2021. A wider package of measures, including play streets is being developed and consultation on the next stage is expected in 2021.	Plans will be developed for individual areas in consultation with communities. New temporary road closures have also taken place in 2020 to enable social distancing.

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
2 (amber measure)	Consider access restrictions which will reduce the dominance of private cars, including in the city centre	Policy Guidance and Development Control	Other policy	2019	Ongoing Programme, next phases to be implemented 2021	DCC via Transport Strategy and Exeter City Futures	DCC, grant funding as available and developer contributions	NO	Partially Funded	£100k - £500k	Planning	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Implementation of scheme(s)	Traffic reduction scheme for Bartholomew Street West implemented and temporary lane closure on Queen Street in place. Roadside interviews in the city centre undertaken to inform a city centre traffic strategy. Liveable Exeter vision for the city published, which includes development on car parks, and a reduction in road space for cars. Initial work on South Street project is progressing, to include improved cycle routes, and connections between the city centre and the Quay area.	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding. New temporary road closures have also taken place in 2020 to enable social distancing.
3 (amber measure)	New transport links and Park & Change facilities to make it easier for those living outside the city to choose active and sustainable travel modes	Transport Planning and Infrastructure	Other	2019	Ongoing Programme	DCC via Transport Strategy	DCC, grant funding as available and developer contributions	NO	Partially Funded	£100k - £500k	Implementation	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Implementation of schemes	Pinhoe Park and Change under construction. Park and Change at Science Park completed but not yet in use.	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
4 (yellow measure)	Changes to parking charges to discourage car travel in peak times, encourage longer stays in the city centre and support other measures in this plan, such as active travel	Traffic Management	Other	2019	2021	ECC via Local Plan	ECC	NO	Not Funded	£100k - £500k	Planning	<1% reduction in emissions. This measure is expected to have an indirect effect on emissions, such that it is not possible to reliably quantify the impact of this measure alone.	Implementation of changes	This was being actively pursued with ECCs equipment providers but future structure of parking charges and plans for city centre car parks are being considered post Covid.	Covid recovery plans will develop and evolve throughout 2021 and beyond.
5	Maximise efficiency of existing highway network	Transport Planning and Infrastructure	Other	2019	Ongoing programme	DCC via Transport Strategy and Exeter City Futures	DCC, ECC, grant funding as available and developer contributions	NO	Partially Funded	£500k - £1 million	Planning	TBC, based on predicted changes to traffic parameters provided by DCC as plans for specific locations emerge and are consulted upon	Implementation of scheme(s)	In planning phase	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding
6 (amber measure)	Access Fund and cycle/walking network, Local Walking and Cycling Infrastructure Plan (LCWIP)	Transport Planning and Infrastructure	Other	2019	Ongoing, as DCC have current plans for upgrades to cycling and walking infrastructure which will evolve as the LCWIP develops	DCC via Transport Strategy	Access Fund	NO	Partially Funded	£1 million - £10 million	Planning	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Adoption of LCWIP	Planned E4 Cycle Route improvements ongoing and E9 route introduced. The next phase of works are being planned. The LCWIP document will be consulted on in 2021	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding
7 (amber measure)	Expand school and community projects, car free events and events promoting active travel, building on the success of the Heavitree pilot	Promoting Travel Alternatives	Other	2019	Ongoing programme, which evolves as previous events and projects are evaluated	ECC via Sport England Local Delivery Pilot & Exeter City Futures	Sport England funding	NO	Partially Funded	£50k - £100k	Implementation	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	School Streets introduced	Trials at three primary schools in 2020, one made permanent so far (Whipton Barton). Community Builders and newly appointed SELDP local Physical Activity Organisers planning play street 'non car events'	Plans will be developed in individual areas with local communities. Increased community cohesion and activism as a result of covid may benefit this work.

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
8 (amber measure)	Use social prescribing and community building to help individuals get and stay active	Public Information	Other	2019	Ongoing programme, which evolves as previous events and projects are evaluated	ECC via Sport England Local Delivery Pilot and local Health Service providers	Sport England funding	NO	Partially Funded	£100k - £500k	Implementation	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Implementation of scheme	Behaviour change training delivered for all Community Builders and Community Connectors to provide support to people to lead active lifestyles. New social prescribing posts recruited to support health & wellbeing of Children and Young Families. Exeter Community Wellbeing Programme established in response to COVID-19 supporting c. 3000 residents in need of support during pandemic	The Covid recovery plans seek to retain and enhance the increase in activity levels, community activism, volunteering and contact with nature seen during lockdown.
9 (amber measure)	High quality parks, play areas, sport and leisure facilities	Promoting Travel Alternatives	Other	2019	Ongoing programme	ECC via Physical Activity Strategy, Sport England Local Delivery Pilot & Local Plan	Sport England funding	NO	Partially Funded	£50k - £100k	Planning	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Implementation of scheme(s)	Physical Activity Strategy published and flagship programmes in development - Wonford Health & Wellbeing Centre and Exeter Arena Sports Village now in feasibility stage. Focus on sites becoming more accessible for sustainable transport and increased active travel infrastructure	Obtaining necessary permissions and consents, and funding

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
10 (yellow measure)	Communications plan, to support measures that will achieve modal shift	Public Information	Other	2019	Ongoing (iterative process of developing and implementing communications / messages)	ECC via Sport England Local Delivery Pilot & Exeter City Futures	ECC via existing internal budgets, Sport England Local Delivery Pilot & Exeter City Futures	NO	Partially Funded	£10k - 50k	Implementation	<1% reduction in emissions. The purpose of this measure is to enable the Council to explain why it is taking action. The measure itself is unlikely to have significant impact on its own.		Communications strategy developed through SELDP - 'Let's Move'. Focus on small steps for 'least active' residents and communities to move more in their local neighbourhoods. Walking & Cycling central to this communications strategy	
11 (yellow measure)	Promote and expand Co-Bikes network, and support the roll out of electric car club vehicles to more locations	Promoting Travel Alternatives	Other	2019	Ongoing programme	DCC, ECC via Transport Strategy, Sport England Local Delivery Pilot & Exeter City Futures	Ongoing programme, dependent on funding availability	NO	Partially Funded	£100k - £500k	Implementation	<1% reduction in emissions. This measure will have indirect benefits for air quality by facilitating active travel and supporting a change in car ownership patterns. It is not possible to reliably model the impact of this measure alone on emissions	Implementation of expansions to schemes, as funding is obtained	DCC have planned upgrades to the Co-Bikes network. Bikes and docking stations upgraded in 2020 and more planned for 2021. Ongoing expansion of car network.	Dependent on funding availability

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
12 (amber measure)	An improved multi-modal public transport network, incorporating cleaner bus technologies	Transport Planning and Infrastructure	Other	2019	Ongoing programme	DCC via GESP, Transport Strategy and Exeter City Futures	TBC	NO	Partially Funded	> £10 million	Planning	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes). As an example, 33% bus electrification would achieve 5% fall in emissions at East Wonford Hill and 66% electrification would achieve 10% reduction.	Implementation of agreed plans	14 Euro 6 busses have entered the fleet and significant new additions to the city's bus network. Plans to be reviewed and recommenced post Covid restrictions on public transport use.	Dependent on funding availability and future demand for public transport (related to covid-19 recovery)
13	Developers to mitigate the effects of their development on air quality	Policy Guidance and Development Control	Other policy	2019	Ongoing	GESP team, ECC via GESP & Local Plan	Resourced by the GESP authorities	NO	Partially Funded	£50k - £100k	Planning	The purpose of this measure is to limit the impact of new development. It is not intended to reduce emissions on the current baseline (although some reduction may be achieved as a result in practice)	Developments delivered	Until GESP is published, officers will be implementing current policy in a robust manner eg when considering retail park applications and new housing.	The GESP timetable has been subject to some delay from when the AQAP was published. The Transportation Strategy describes what the future of Transport in Exeter should look like, but without a matching local plan in all the District Council areas, the necessary contributions and infrastructure will have to be negotiated on a site by site basis as each application is decided.

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
14	Policies deliver development where private car use is not the only realistic travel choice	Policy Guidance and Development Control	Other policy	2019	Ongoing	GESP team, ECC via GESP & Local Plan	Resourced by the GESP authorities	NO	Partially Funded	£50k - £100k	Planning	The purpose of this measure is to limit the impact of new development. It is not intended to reduce emissions on the current baseline (although some reduction may be achieved as a result in practice)	Developments delivered	Liveable Exeter vision for development in the city which is not reliant on car travel.	Work on the Liveable Exeter project continues but the GESP timetable has been subject to some delay from when the AQAP was published. (see measure 13).
15 (yellow measure)	More things to see/do in the City Centre, encouraging longer stays and supporting events which promote sustainable travel, active and healthy lifestyles.	Policy Guidance and Development Control	Other policy	2019	Ongoing programme	ECC via Local Plan	TBC once strategy adopted	NO	Partially Funded		Planning	<1% reduction in emissions. This measure will not have a significant direct impact on emissions, but will support the step change in behaviour which will be required to meet the City Council's aspirations for active and healthy travel.	Completion of Strategy and then implementation	St Sidwells Point leisure centre development commenced. Consultants appointed to produce City Centre Strategy	The impact of Covid-19 on the city centre and travel to the city centre will be better understood as the year progresses
16	Better information to raise awareness and improve the level of understanding of air pollution and transport issues within communities	Public Information	Other	2019	Ongoing (iterative process of developing and implementing communications / messages).	ECC	Internal ECC budgets	NO	Partially Funded	£10k - 50k	Planning	Enable the Council to explain why it is taking action. Measure itself is unlikely to have significant impact on its own.		Baseline evidence report completed and will be subject to annual review following publication of each year's measurement data and any new research, national guidance etc.	Future communications may be brought under the umbrella of the Net Zero plans

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
17	An air pollution monitoring network that supports the measures in this action plan	Public Information	Other	2019	Ongoing evolution of network may be required, as needs change	ECC	Internal ECC budgets or grant funding if available	NO	Funded	< £10k	Implementation	This measure would not in itself deliver reductions in emissions, but would support the other measures in this plan	monitoring equipment operational	4 new diffusion tube monitoring sites added to the network in 2020. The potential benefits of new sensor technologies has being evalutaed, but no projects have currently been identified where these types of equipment would provide added value.	

2.3 PM_{2.5} – Local Authority Approach to Reducing Emissions and/or Concentrations

As detailed in Policy Guidance LAQM.PG16 (Chapter 7), local authorities are expected to work towards reducing emissions and/or concentrations of PM_{2.5} (particulate matter with an aerodynamic diameter of 2.5µm or less). There is clear evidence that PM_{2.5} has a significant impact on human health, including premature mortality, allergic reactions, and cardiovascular diseases.

Public Health England’s Public Health Outcomes Framework tool shows that in Exeter in 2017 the fraction of mortality attributable to particulate air pollution was 4.4%. This is equal to the regional figure for the south west (4.4%) and below the national level of 5.1%.

Exeter therefore has levels of particulate matter which are causing harm, but this problem is less severe than in nearly 75% of the country.

Indicator	Period	Exeter		Region		England		England		Best/Highest
		Recent Trend	Count	Value	Value	Value	Worst/Lowest	Range		
Fraction of mortality attributable to particulate air pollution	2017	–	-	4.4%	4.4%	5.1%	2.5%		7.1%	
Air pollution: fine particulate matter New data	2019	–	-	7.4	7.3	9.0	12.4		3.8	

Data from Public Health England

There is now a capacity for direct monitoring of PM_{2.5} in Exeter, since August 2018. This showed PM_{2.5} concentrations of 8.6 µg/m³ at RAMM and 6.8 µg/m³ at Alphington Street. The national modelling by PHE shown above suggests that for 2019 (the most recent data available), the average figure for the city as a whole was similar at 7.4 µg/m³. The annual average EU limit value for PM_{2.5} is 25 µg/m³ so there is no suggestion that this level is being exceeded in Exeter. However the council still has a duty to reduce emissions of and exposure to this pollutant.

During 2021, Exeter City Council will be taking the measures described in Table 2.2 that will address PM_{2.5} as well as NO₂.

Approximately 60% of Exeter is designated as Smoke Control Areas. Controls on solid fuel combustion appliances and fuels are likely to have restricted PM_{2.5} emissions in these areas to some extent.

3 Air Quality Monitoring Data and Comparison with Air Quality Objectives and National Compliance

This section sets out the monitoring undertaken within 2020 by Exeter City Council and how it compares with the relevant air quality objectives. In addition, monitoring results are presented for a five-year period between 2016 and 2020 to allow monitoring trends to be identified and discussed.

3.1 Summary of Monitoring Undertaken

3.1.1 Automatic Monitoring Sites

Exeter City Council undertook automatic (continuous) monitoring at 2 sites during 2020. Table A.1 in Appendix A shows the details of the automatic monitoring sites. NB. Local authorities do not have to report annually on the following pollutants: 1,3 butadiene, benzene, carbon monoxide and lead, unless local circumstances indicate there is a problem. This [page](#) presents automatic monitoring results for Exeter, with automatic monitoring results also available through the UK-Air website .

Maps showing the location of the monitoring sites are provided in Appendix D. Further details on how the monitors are calibrated and how the data has been adjusted are included in Appendix C.

3.1.2 Non-Automatic Monitoring Sites

Exeter City Council undertook non- automatic (i.e. passive) monitoring of NO₂ at 83 sites during 2020. Table A.2 in Appendix A presents the details of the non-automatic sites.

Maps showing the location of the monitoring sites are provided in Appendix D and at this [link](#). Further details on Quality Assurance/Quality Control (QA/QC) for the diffusion tubes, including bias adjustments and any other adjustments applied (e.g. annualisation and/or distance correction), are included in Appendix C.

3.2 Individual Pollutants

The air quality monitoring results presented in this section are, where relevant, adjusted for bias, annualisation (where the annual mean data capture is below 75% and greater than 25%), and distance correction. Further details on adjustments are provided in Appendix C.

3.2.1 Nitrogen Dioxide (NO₂)

Table A.3 and Table A.4 in Appendix A compare the ratified and adjusted monitored NO₂ annual mean concentrations for the past five years with the air quality objective of 40µg/m³. Note that the concentration data presented represents the concentration at the location of the monitoring site, following the application of bias adjustment and annualisation, as required (i.e. the values are exclusive of any consideration to fall-off with distance adjustment).

For diffusion tubes, the full 2020 dataset of monthly mean values is provided in Appendix B. Note that the concentration data presented in Table B.1 includes distance corrected values, only where relevant.

Table A.5 in Appendix A compares the ratified continuous monitored NO₂ hourly mean concentrations for the past five years with the air quality objective of 200µg/m³, not to be exceeded more than 18 times per year.

The data shows that no locations measured an exceedence of the annual objective or the proxy for the hourly objective in 2020. This is as a result of a significant fall in concentrations between 2019 and 2020. This can be attributed to the fall in traffic flows as a result of lockdowns and COVID-19.

It should also be noted that the local Exeter bias adjustment figure used this year is lower than in previous years, which does reduce the final reported concentrations. Use of the national bias adjustment factor would only result in one location with concentrations above the objective level (East Wonford Hill DT57) so the choice of factors does not greatly affect the conclusions drawn. The Council has followed DEFRA guidance in choosing to use the local factor and it is considered robust.

2020 can be seen as exceptional, in terms of the change in traffic flows so the Council has no plans to amend the AQMA as a result of the changes to NO₂ concentrations seen this year. However, there was a trend up to 2019 of a gradually reducing number of sites which were failing to meet the objective, such as the Blackboy Road / Pinhoe Ropad junction. If

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this trend continues in 2021 it might then be possible to conclude with reasonable safety that the exceedences at locations such as this have been resolved.

Areas of exceedence along the Heavitree corridor are expected to return in 2021 where congestion and poor dispersion combine to create specific local conditions that cause higher pollution levels. The extent of these areas is smaller than the extent of the AQMA, however Exeter City Council has no current plans to amend the AQMA and reduce the area included. The AQMA boundary was originally drawn to include a larger area than just the strict areas of exceedence (Exeter City Council 2011). The rationale for this boundary remains sound although the situation will be kept under review.

Figure A.1 and the data in Table A.4 shows that NO₂ levels in Exeter at most sites were broadly stable from 2016 to 2019, which followed a decrease from 2009 levels. There will be natural variation between years as a result of local small changes in traffic flows (road works etc) and weather patterns which make identifying any trend difficult over short periods of time. Any long term trends which develop will necessitate updates to the AQAP, which will be reported in future Annual Status Reports.

In 2020 the Council added three new diffusion tube locations to its network. These were intended to provide additional data on concentrations at or close to relevant receptors between the existing sites and allow us to better understand concentrations around the city centre. As expected, no exceedences of the objectives occurred at any of these new sites.

Exeter City Council has always chosen to focus monitoring at expected hot spots and relevant worst-case locations. No further revision to the monitoring network is therefore currently proposed in order to identify suspected exceedences, although regular review of the network will continue to ensure that monitoring is taking place at all areas of potential exceedence at locations of relevant exposure.

3.2.2 Particulate Matter (PM₁₀)

Table A.6 in Appendix A: Monitoring Results compares the ratified and adjusted monitored PM₁₀ annual mean concentrations for the past five years with the air quality objective of 40µg/m³.

Table A.7 in Appendix A compares the ratified continuous monitored PM₁₀ daily mean concentrations for the past five years with the air quality objective of 50µg/m³, not to be exceeded more than 35 times per year.

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There were no measured exceedences of the PM₁₀ air quality objectives in Exeter in 2020. Annual average concentrations have been broadly consistent, with some interannual variability, and there was just one exceedence of an hourly mean of 50µg/m³ in 2020 (at RAMM). The long-term trend in annual concentrations is a decline since 2005 or 2006.

3.2.3 Particulate Matter (PM_{2.5})

Table A.8 in Appendix A presents the ratified and adjusted monitored PM_{2.5} annual mean concentrations for the past five years.

There were no measured exceedences of the PM_{2.5} air quality objectives in Exeter in 2020.

3.2.4 Ozone (O₃)

Table A.9 in Appendix A presents the ratified continuous monitored O₃ 8-hour mean concentrations for the past 5 years with the air quality objective of 100µg/m³, not to be exceeded more than 10 times per year.

Although not a local air pollutant, Exeter City Council has the facility to measure ozone (O₃) levels. Table A.9 in Appendix A compares the ratified continuous monitored O₃ concentrations for 2020 with the nationally applied air quality objective for this pollutant. (In 2016, the data capture was low (below 90%) and so the 97th percentile of 8-hour running means is also shown for comparison with the objective). The objective was exceeded in Exeter in 2019, which may be a result of the fine summer. In 2020, the number of occasions when there was an 8 hour running mean of >100 micrograms per cubic meter increased significantly. This could have been caused by the interaction between NO_x and ozone in the atmosphere. With lower concentrations of NO being emitted during lockdowns, less ozone would be converted to oxygen (O₂). As stated above, ozone is not a local air pollutant so Exeter City Council is not responsible for reporting on, or mitigating, exceedences of this objective. This is the responsibility of DEFRA.

Appendix A: Monitoring Results

Table A.1 – Details of Automatic Monitoring Sites

Site ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Monitoring Technique	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Inlet Height (m)
CM1	Exeter Roadside	Kerbside	291939	92830	NO ₂ ; O ₃ ; PM ₁₀ ; PM _{2.5}	YES	Chemiluminescent; UVA; Optical Light Scattering	0	1	1.7
CM2	Alphington Street	Roadside	291670	91773	PM ₁₀ ; PM _{2.5}	NO	Optical Light Scattering	12	3	1.7

Notes:

(1) 0m if the monitoring site is at a location of exposure (e.g. installed on the façade of a residential property).

(2) N/A if not applicable

Table A.2 – Details of Non-Automatic Monitoring Sites

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT1	High Street /Castle Street	Kerbside	292199	92814	NO2	YES, Exeter AQMA	50.0	0.5	No	2.0
DT2	Longbrook Street	Kerbside	292315	93016	NO2	NO	0.0	1.0	No	1.7
DT3	New North Road	Kerbside	292185	93049	NO2	YES, Exeter AQMA	0.0	1.0	No	2.0
DT4	Queen Street	Kerbside	291779	93011	NO2	YES, Exeter AQMA	0.0	1.5	No	2.0
DT5, DT6	RAMM 2	Kerbside	291944	92826	NO2	YES, Exeter AQMA	0.0	1.0	Yes	1.7
DT7	High Street Guildhall	Roadside	291984	92626	NO2	YES, Exeter AQMA	0.0	2.0	No	2.0
DT8	North Street	Kerbside	291895	92569	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT9	South Street	Roadside	291943	92511	NO2	YES, Exeter AQMA	4.0	2.5	No	2.0
DT10	Market Street	Kerbside	291833	92433	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT11	Magdalen Street	Kerbside	292291	92292	NO2	YES, Exeter AQMA	6.0	2.0	No	1.7
DT12	Magdalen Street façade	Kerbside	292422	92320	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT13	Archibald Road	Roadside	292590	92743	NO2	NO	0.0	1.5	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT14	Heavitree Road inbound	Roadside	292832	92731	NO2	YES, Exeter AQMA	0.0	10.0	No	2.0
DT15	Heavitree Road outbound	Kerbside	292703	92807	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT16	Holloway Street	Kerbside	292378	92039	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT17	Carder's Court, Shilhay	Roadside	291699	92091	NO2	NO	0.0	15.0	No	1.7
DT18	Rear of Gervase Avenue	Roadside	291657	91973	NO2	YES, Exeter AQMA	5.0	18.0	No	2.0
DT19	Alphington Street	Kerbside	291669	91812	NO2	YES, Exeter AQMA	0.0	1.0	No	2.0
DT20	Alphington Road inbound	Roadside	291532	91349	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT21	Queen's Road	Urban Background	291460	91390	NO2	NO	8.0	2.0	No	1.7
DT22	Alphington Road outbound	Roadside	291509	91151	NO2	YES, Exeter AQMA	0.0	8.0	No	1.7
DT23	Alphington Road outer	Roadside	291518	90813	NO2	YES, Exeter AQMA	15.0	2.0	No	1.7
DT24	Church Road Alphington	Roadside	291691	90425	NO2	YES, Exeter AQMA	0.0	1.5	No	1.7
DT25	Church Road II	Kerbside	291767	90160	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT26	Alphington Cross	Roadside	291520	90531	NO2	YES, Exeter AQMA	0.0	1.8	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT27	Cowick Street (Cowick Lane)	Kerbside	290864	91725	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT28	Cowick Street (inbound)	Roadside	291249	91874	NO2	YES, Exeter AQMA	0.0	4.0	No	1.7
DT29	Cowick Street (outbound)	Roadside	291376	91944	NO2	YES, Exeter AQMA	0.0	1.5	No	1.7
DT30	Cowick Street (Exe Bridges)	Roadside	291500	92055	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT31	Okehampton Street	Roadside	291351	92169	NO2	YES, Exeter AQMA	0.0	4.0	No	1.7
DT32	Station Road	Roadside	290830	96598	NO2	NO	0.0	2.1	No	1.7
DT33	Bonhay Road (St Clements Lane)	Roadside	291253	93299	NO2	YES, Exeter AQMA	0.0	2.0	No	2.0
DT34	Red Cow Village	Kerbside	291242	93483	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT35	Red Cow II	Kerbside	291272	93468	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT36	Cowley Bridge Road	Roadside	291054	94399	NO2	YES, Exeter AQMA	0.0	4.0	No	1.7
DT37	Pennsylvania Road	Roadside	292391	93291	NO2	NO	0.0	1.0	No	1.7
DT38	York Road School	Roadside	292469	93245	NO2	NO	3.5	2.5	No	1.7
DT39	York Road	Kerbside	292579	93146	NO2	NO	1.5	0.1	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT40	Union Road	Roadside	293047	93877	NO2	NO	0.0	1.0	No	1.7
DT41	Pinhoe Road inbound	Roadside	293405	93395	NO2	YES, Exeter AQMA	0.0	3.0	No	1.7
DT42	Pinhoe Road (Polsloe Road)	Kerbside	293251	93375	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT43	Blackboy Road (Polsloe Road)	Roadside	293227	93356	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT44	Beacon Heath	Kerbside	295068	94487	NO2	NO	10.0	1.0	No	1.7
DT45	Venny Bridge	Kerbside	295888	94101	NO2	NO	8.0	1.0	No	1.7
DT46	Pinhoe	Kerbside	296418	94470	NO2	NO	20.0	0.1	No	1.7
DT47	Langaton Lane	Urban Background	296984	94327	NO2	NO	12.0	0.5	No	1.7
DT48	Pinn Lane	Roadside	296494	93782	NO2	NO	9.5	1.0	No	2.0
DT49	Pinhoe Road (Fairfield Avenue)	Roadside	295413	93689	NO2	YES, Exeter AQMA	0.0	5.0	No	1.7
DT50	East John Walk	Urban Background	293091	92825	NO2	NO	1.5	N/A	No	1.7
DT51	Magdalen Road (Barrack Road)	Kerbside	293448	92419	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT52	Livery Dole	Roadside	293418	92497	NO2	YES, Exeter AQMA	0.0	1.5	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT53	Rowancroft	Kerbside	293533	92473	NO2	YES, Exeter AQMA	0.0	0.2	No	2.0
DT54	Salutary Mount	Roadside	293738	92396	NO2	YES, Exeter AQMA	4.5	1.5	No	1.7
DT55	Fore Street Heavitree outbound	Roadside	293781	92409	NO2	YES, Exeter AQMA	6.0	4.0	No	1.7
DT56	Fore Street Heavitree inbound	Roadside	294043	92359	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT57	East Wonford Hill	Roadside	294410	92310	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT58	Honiton Road	Roadside	295203	92378	NO2	YES, Exeter AQMA	20.0	1.5	No	2.0
DT59	Honiton Road façade	Roadside	295191	92395	NO2	NO	0.0	15.0	No	1.7
DT60	Sidmouth Road lamp post	Roadside	295466	92365	NO2	YES, Exeter AQMA	7.0	2.0	No	2.0
DT61	Sidmouth Road Middlemoor	Roadside	295636	92232	NO2	YES, Exeter AQMA	0.0	10.0	No	1.7
DT62	Newcourt Way	Roadside	295710	90571	NO2	NO	17.0	2.0	No	2.0
DT63	Topsham Road (Countess Wear)	Roadside	294694	90001	NO2	YES, Exeter AQMA	0.0	5.0	No	2.0
DT64	Bridge Road (Countess Wear)	Roadside	294652	89974	NO2	NO	0.0	15.0	No	1.7
DT65	High Street Topsham	Kerbside	296415	88477	NO2	NO	0.0	1.0	No	1.7

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Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT66	Topsham Road (Tollards Road)	Roadside	294227	90435	NO2	YES, Exeter AQMA	0.0	1.5	No	1.7
DT67	Topsham Road (Barrack Road)	Roadside	293213	91245	NO2	YES, Exeter AQMA	0.0	10.0	No	1.7
DT68	Riverside Valley Park	Urban Background	292291	91678	NO2	NO	N/A	N/A	No	2.0
DT69	Cowick Barton Playing Fields	Urban Background	291016	91304	NO2	NO	N/A	N/A	No	1.7
DT70	Exwick Playing Fields	Urban Background	291298	92593	NO2	NO	N/A	N/A	No	2.0
DT71	Heavitree Pleasure Ground	Urban Background	294387	92611	NO2	NO	N/A	N/A	No	2.0
DT72	Ladysmith School/Pretoria Road	Roadside	293617	93090	NO2	NO	1.5	1.5	No	1.7
DT73	Pennsylvania	Urban Background	293052	94185	NO2	NO	6.0	2.0	No	2.0
DT74	Northernhay Gardens	Urban Background	292056	93043	NO2	NO	N/A	N/A	No	2.0
DT75	Chudleigh Road	Roadside	291721	89727	NO2	YES, Exeter AQMA	0.0	4.0	No	2.0
DT76	Mill Lane	Urban Background	291555	90449	NO2	NO	8.5	1.0	No	2.0
DT77	Sidwell Street	Kerbside	292553	93082	NO2	YES, Exeter AQMA	6.0	1.0	No	2.0
DT78	Station Road Pinhoe	Other	296415	94165	NO2	NO	1.5	1.5	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT79	Tithebarn Link Road	Roadside	296827	93886	NO2	NO	2.0	2.0	No	2.0
DT80	Exeter Road	Roadside	295967	88876	NO2	NO	14.5	3.0	No	2.0
DT81	St. Leonards Road	Roadside	292637	91991	NO2	NO	0.0	2.0	No	1.7
DT82	Newtown	Urban Background	292847	92911	NO2	NO	0.0	3.5	No	2.0
DT83	New Bridge St	Roadside	291655	92258	NO2	YES, Exeter AQMA	0.0	2.0	No	2.0
DT84	Lower Coombe St	Roadside	291897	92217	NO2	NO	2.0	10.0	No	1.7

Notes:

(1) 0m if the monitoring site is at a location of exposure (e.g. installed on the façade of a residential property).

(2) N/A if not applicable.

Table A.3 – Annual Mean NO₂ Monitoring Results: Automatic Monitoring (µg/m³)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2020 (%) ⁽²⁾	2016	2017	2018	2019	2020
CM1	291939	92830	Kerbside		98.6	30.5	27.7	29.1	29.0	18.8

Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG16.

Reported concentrations are those at the location of the monitoring site (annualised, as required), i.e. prior to any fall-off with distance correction.

Notes:

The annual mean concentrations are presented as µg/m³.

Exceedances of the NO₂ annual mean objective of 40µg/m³ are shown in **bold**.

All means have been “annualised” as per LAQM.TG16 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

Concentrations are those at the location of monitoring and not those following any fall-off with distance adjustment.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

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Table A.4 – Annual Mean NO₂ Monitoring Results: Non-Automatic Monitoring (µg/m³)

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2020 (%) ⁽²⁾	2016	2017	2018	2019	2020
DT1	292199	92814	Kerbside		97.2	26.8	28.0	29.2	26.5	17.0
DT2	292315	93016	Kerbside		97.2	25.5	25.9	25.2	26.4	17.5
DT3	292185	93049	Kerbside		97.2	26.3	26.5	25.9	27.8	18.8
DT4	291779	93011	Kerbside		97.2	23.2	24.3	23.1	23.8	16.2
DT5, DT6	291944	92826	Kerbside		97.2	29.5	27.9	29.3	27.5	18.5
DT7	291984	92626	Roadside		97.2	25.2	24.4	26.0	22.6	15.7
DT8	291895	92569	Kerbside		97.2	33.4	35.7	33.9	35.7	22.6
DT9	291943	92511	Roadside		97.2	31.1	31.5	29.1	28.5	18.7
DT10	291833	92433	Kerbside		97.2	29.6	31.0	30.8	29.5	18.6
DT11	292291	92292	Kerbside		97.2	28.1	29.2	29.4	28.9	19.5
DT12	292422	92320	Kerbside		88.2	30.1	31.8	31.1	29.3	20.0
DT13	292590	92743	Roadside		97.2	22.5	20.8	21.6	19.6	13.2
DT14	292832	92731	Roadside		97.2	21.0	19.6	20.3	19.0	13.2

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Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2020 (%) ⁽²⁾	2016	2017	2018	2019	2020
DT15	292703	92807	Kerbside		97.2	36.4	34.1	34.5	31.4	22.3
DT16	292378	92039	Kerbside		97.2	33.4	31.3	34.2	29.3	21.3
DT17	291699	92091	Roadside		97.2	22.4	22.0	22.4	21.4	15.5
DT18	291657	91973	Roadside		97.2	23.4	23.4	22.3	22.7	15.8
DT19	291669	91812	Kerbside		97.2	40.3	40.8	47.0	42.0	28.5
DT20	291532	91349	Roadside		97.2	32.9	33.9	33.6	31.3	22.4
DT21	291460	91390	Urban Background		97.2	14.2	13.7	15.3	12.7	9.1
DT22	291509	91151	Roadside		97.2	27.5	26.8	29.0	26.2	17.7
DT23	291518	90813	Roadside		97.2	24.8	23.4	27.3	23.4	15.3
DT24	291691	90425	Roadside		90.1	25.8	29.1	28.0	23.4	18.3
DT25	291767	90160	Kerbside		97.2	26.9	25.6	26.1	23.5	16.2
DT26	291520	90531	Roadside		97.2		32.7	31.3	30.2	20.4
DT27	290864	91725	Kerbside		97.2	37.0	37.0	39.9	38.7	26.8
DT28	291249	91874	Roadside		97.2	23.0	20.7	23.9	21.1	15.6

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Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2020 (%) ⁽²⁾	2016	2017	2018	2019	2020
DT29	291376	91944	Roadside		97.2	33.6	33.6	43.4	34.4	24.3
DT30	291500	92055	Roadside		90.1	31.7	32.0	33.2	30.1	22.1
DT31	291351	92169	Roadside		97.2	24.3	24.6	25.2	24.3	17.3
DT32	290830	96598	Roadside		97.2		27.1	25.4	25.4	17.7
DT33	291253	93299	Roadside		97.2	29.4	28.7	30.9	26.8	19.2
DT34	291242	93483	Kerbside		97.2	37.7	38.0	38.3	36.0	26.5
DT35	291272	93468	Kerbside		97.2	31.7	31.9	31.4	31.1	21.5
DT36	291054	94399	Roadside		97.2	31.5	32.3	33.8	32.5	22.9
DT37	292391	93291	Roadside		97.2	28.0	26.7	28.6	28.4	18.3
DT38	292469	93245	Roadside		97.2	29.1	28.4	29.7	27.7	18.1
DT39	292579	93146	Kerbside		97.2	36.2	37.6	38.9	36.2	23.3
DT40	293047	93877	Roadside		97.2	26.4	24.0	28.0	26.4	16.7
DT41	293405	93395	Roadside		97.2	31.2	30.2	31.2	29.8	20.9
DT42	293251	93375	Kerbside		97.2	42.1	41.2	37.2	35.9	25.6

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Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2020 (%) ⁽²⁾	2016	2017	2018	2019	2020
DT43	293227	93356	Roadside		97.2	30.9	29.2	28.2	25.7	19.2
DT44	295068	94487	Kerbside		97.2	19.7	19.7	20.3	17.8	13.6
DT45	295888	94101	Kerbside		97.2	18.8	18.5	19.1	18.0	14.2
DT46	296418	94470	Kerbside		97.2	27.4	23.3	24.8	23.1	18.4
DT47	296984	94327	Urban Background		89.8	18.1	15.7	18.7	17.9	13.3
DT48	296494	93782	Roadside		97.2	17.4	17.2	19.3	17.6	12.8
DT49	295413	93689	Roadside		97.2	19.7	18.9	19.7	17.9	12.6
DT50	293091	92825	Urban Background		97.2	15.3	14.5	14.5	14.0	9.7
DT51	293448	92419	Kerbside		97.2	36.9	37.2	39.7	35.5	24.3
DT52	293418	92497	Roadside		87.6	46.8	49.9	48.7	42.6	31.1
DT53	293533	92473	Kerbside		97.2	39.8	43.5	46.4	38.5	27.4
DT54	293738	92396	Roadside		89.8	49.7	52.7	53.6	43.4	32.7
DT55	293781	92409	Roadside		97.2	31.4	30.0	31.2	26.7	19.8
DT56	294043	92359	Roadside		88.2	38.5	40.9	43.4	40.3	29.0

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Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2020 (%) ⁽²⁾	2016	2017	2018	2019	2020
DT57	294410	92310	Roadside		97.2	57.9	59.0	<u>61.9</u>	53.5	38.2
DT58	295203	92378	Roadside		97.2	49.9	49.3	50.6	47.3	33.2
DT59	295191	92395	Roadside		97.2	20.1	19.7	24.5	20.4	14.8
DT60	295466	92365	Roadside		97.2	35.0	35.8	37.0	30.7	23.5
DT61	295636	92232	Roadside		97.2	22.0	23.3	24.2	21.8	15.5
DT62	295710	90571	Roadside		97.2	17.8	20.2	19.2	16.3	11.5
DT63	294694	90001	Roadside		97.2	24.6	25.0	27.0	25.4	18.1
DT64	294652	89974	Roadside		97.2	20.5	19.9	22.6	20.6	17.8
DT65	296415	88477	Kerbside		97.2	24.3	26.9	27.9	24.4	17.2
DT66	294227	90435	Roadside		97.2	34.9	35.4	39.7	36.4	25.0
DT67	293213	91245	Roadside		89.8	25.0	23.4	25.6	21.5	15.9
DT68	292291	91678	Urban Background		97.2			13.7	13.8	9.4
DT69	291016	91304	Urban Background		97.2			11.5	11.2	7.6
DT70	291298	92593	Urban Background		97.2			17.5	16.1	12.3

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Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2020 (%) ⁽²⁾	2016	2017	2018	2019	2020
DT71	294387	92611	Urban Background		87.6			11.2	10.5	7.6
DT72	293617	93090	Roadside		97.2				14.2	10.6
DT73	293052	94185	Urban Background		87.6				10.2	7.5
DT74	292056	93043	Urban Background		78.5				11.4	8.3
DT75	291721	89727	Roadside		97.2				15.8	11.1
DT76	291555	90449	Urban Background		97.2				14.7	9.6
DT77	292553	93082	Kerbside		97.2				31.1	18.6
DT78	296415	94165	Other		97.2				15.1	10.6
DT79	296827	93886	Roadside		97.2				19.5	14.5
DT80	295967	88876	Roadside		97.2				19.8	14.3
DT81	292637	91991	Roadside		97.2				15.6	11.2
DT82	292847	92911	Urban Background		97.2					10.8
DT83	291655	92258	Roadside		97.2					19.5
DT84	291897	92217	Roadside		97.2					15.5

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- ☒ Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG16.
- ☒ Diffusion tube data has been bias adjusted.
- ☒ Reported concentrations are those at the location of the monitoring site (bias adjusted and annualised, as required), i.e. prior to any fall-off with distance correction.

Notes:

The annual mean concentrations are presented as $\mu\text{g}/\text{m}^3$.

Exceedances of the NO_2 annual mean objective of $40\mu\text{g}/\text{m}^3$ are shown in **bold**.

NO_2 annual means exceeding $60\mu\text{g}/\text{m}^3$, indicating a potential exceedance of the NO_2 1-hour mean objective are shown in **bold and underlined**.

Means for diffusion tubes have been corrected for bias. All means have been “annualised” as per LAQM.TG16 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

Concentrations are those at the location of monitoring and not those following any fall-off with distance adjustment.

- (1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.
- (2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

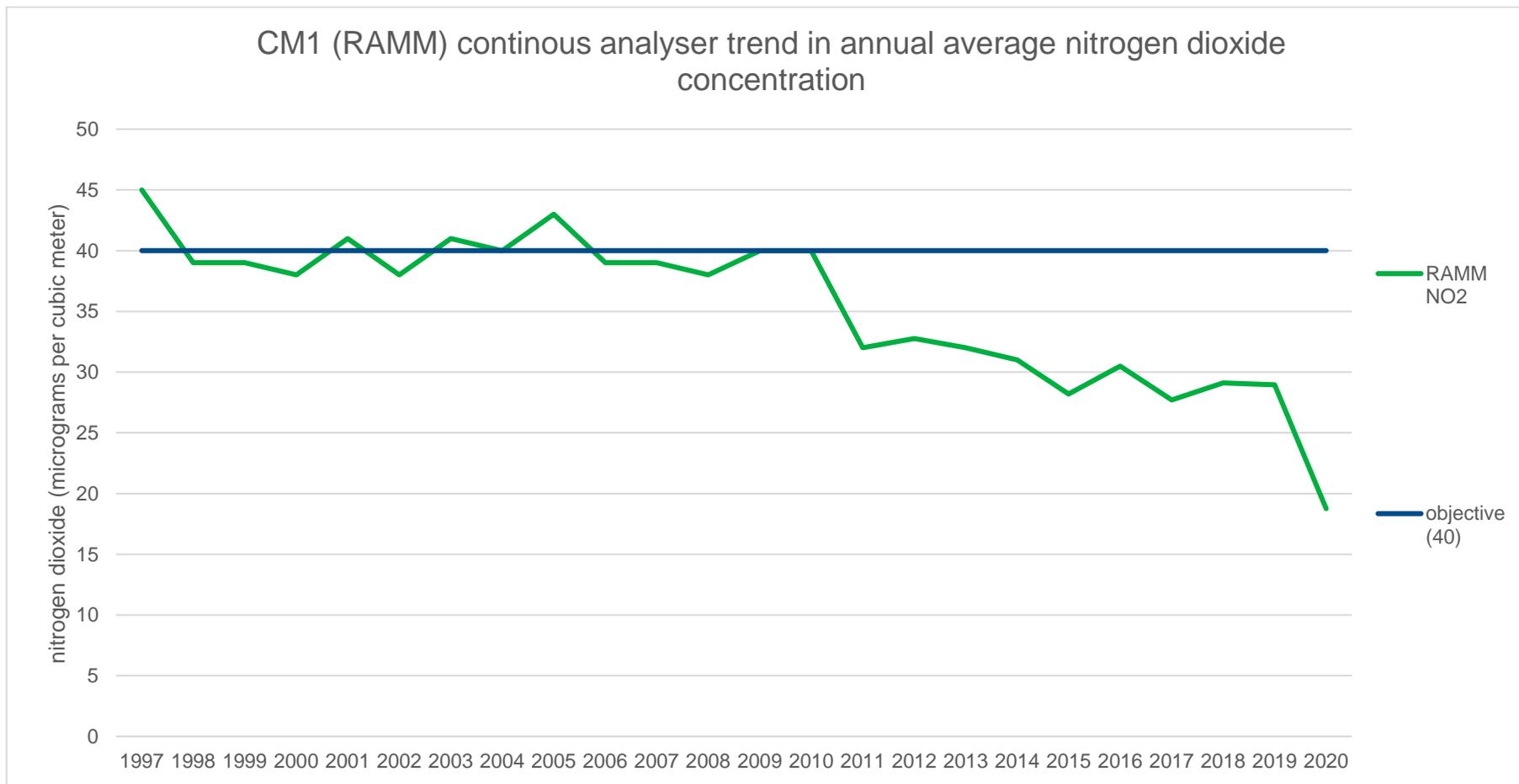
Exeter City Council

Figure A.1 – Trends in Annual Mean NO₂ Concentrations

The graphs below show the five year trends in annual average nitrogen dioxide concentrations at the RAMM continuous analyser and then each of the diffusion tube monitoring sites. The diffusion tubes sites are grouped roughly by geographic location. Each graph shows the objective level of 40 micrograms per cubic meter.

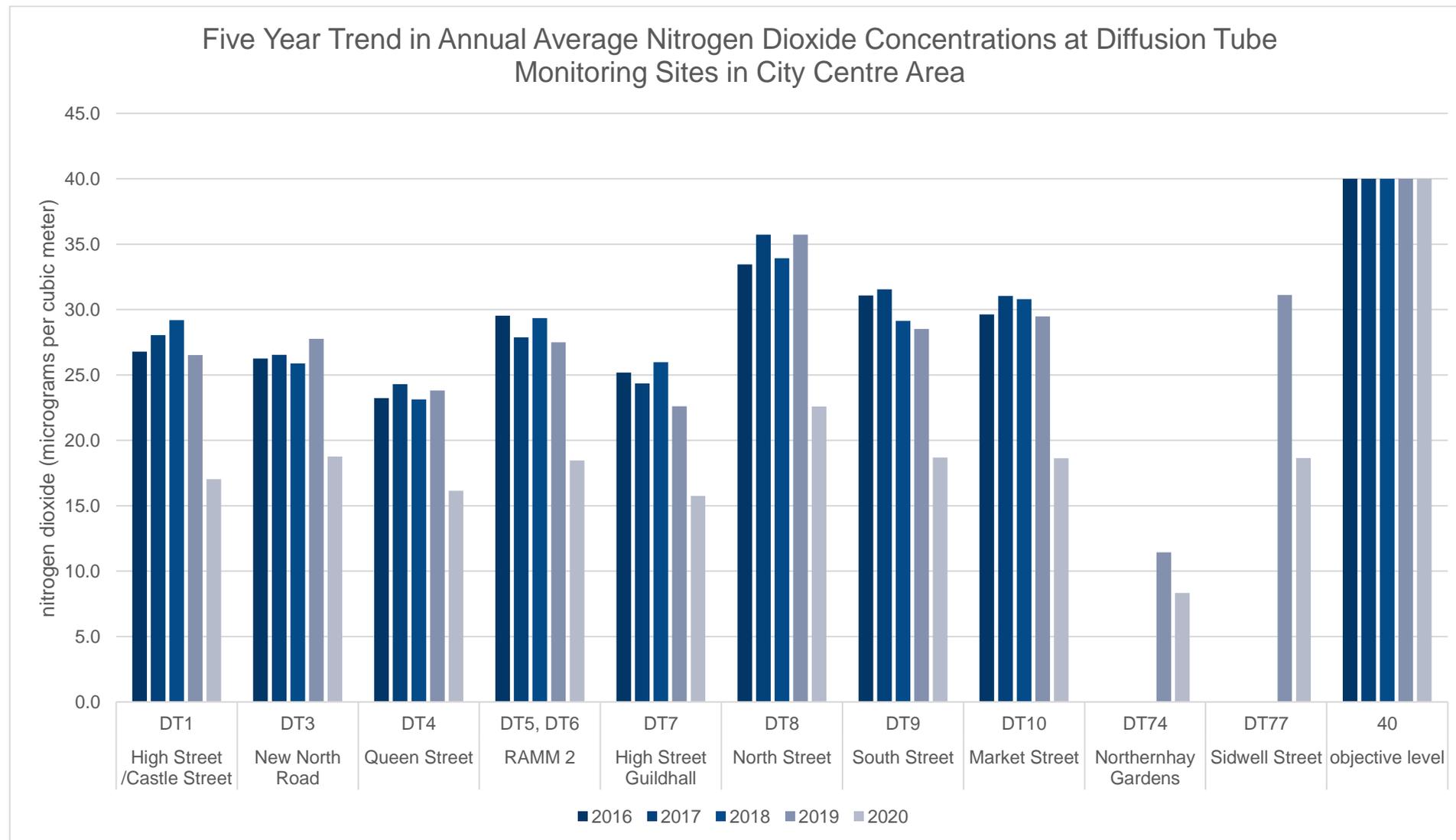
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The first graph shows concentrations at the RAMM continuous analyser since monitoring commenced in 1997. Levels fluctuated around the objective of 40 micrograms per cubic meter until 2009, since when they have fallen below the objective.

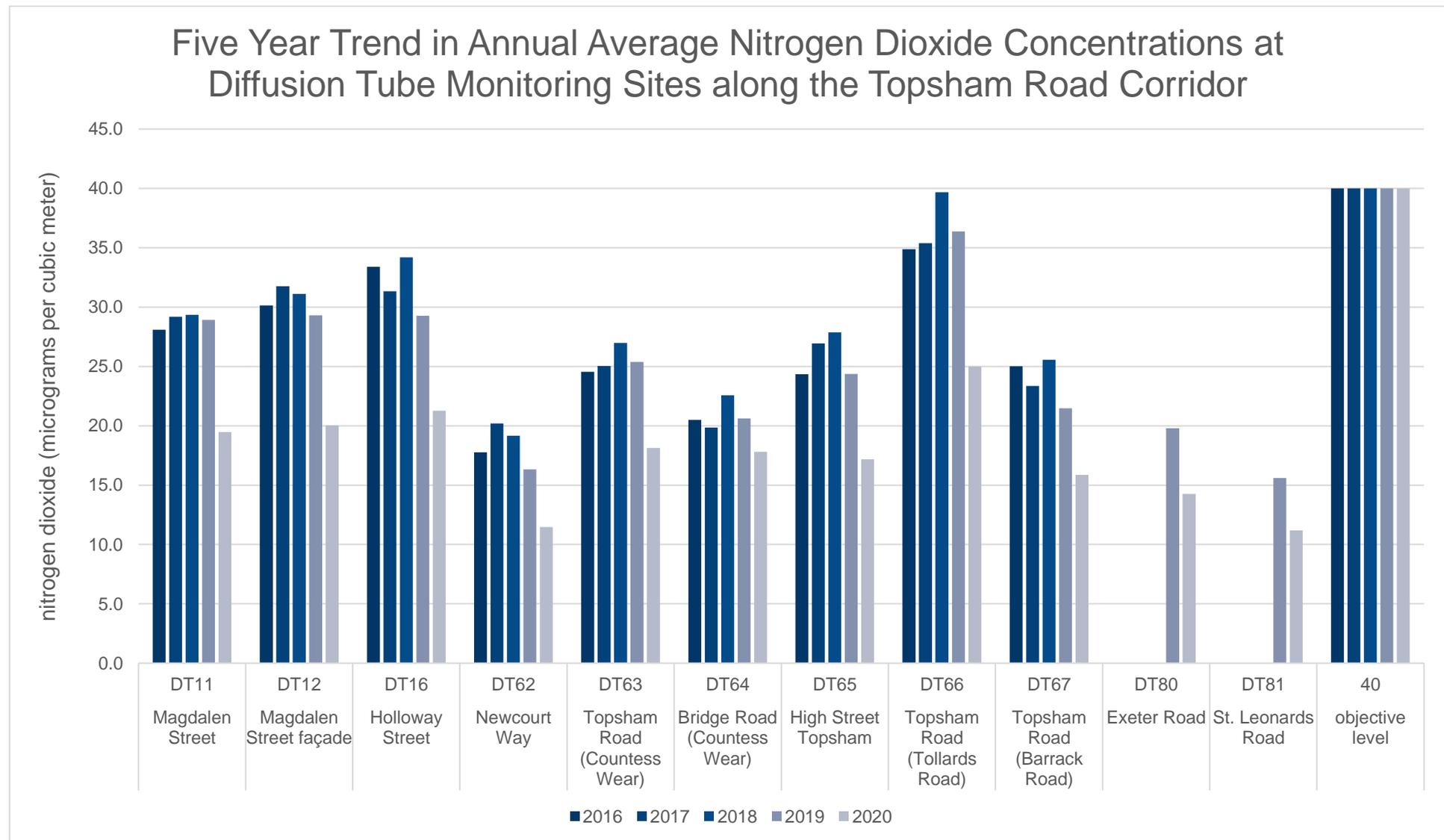


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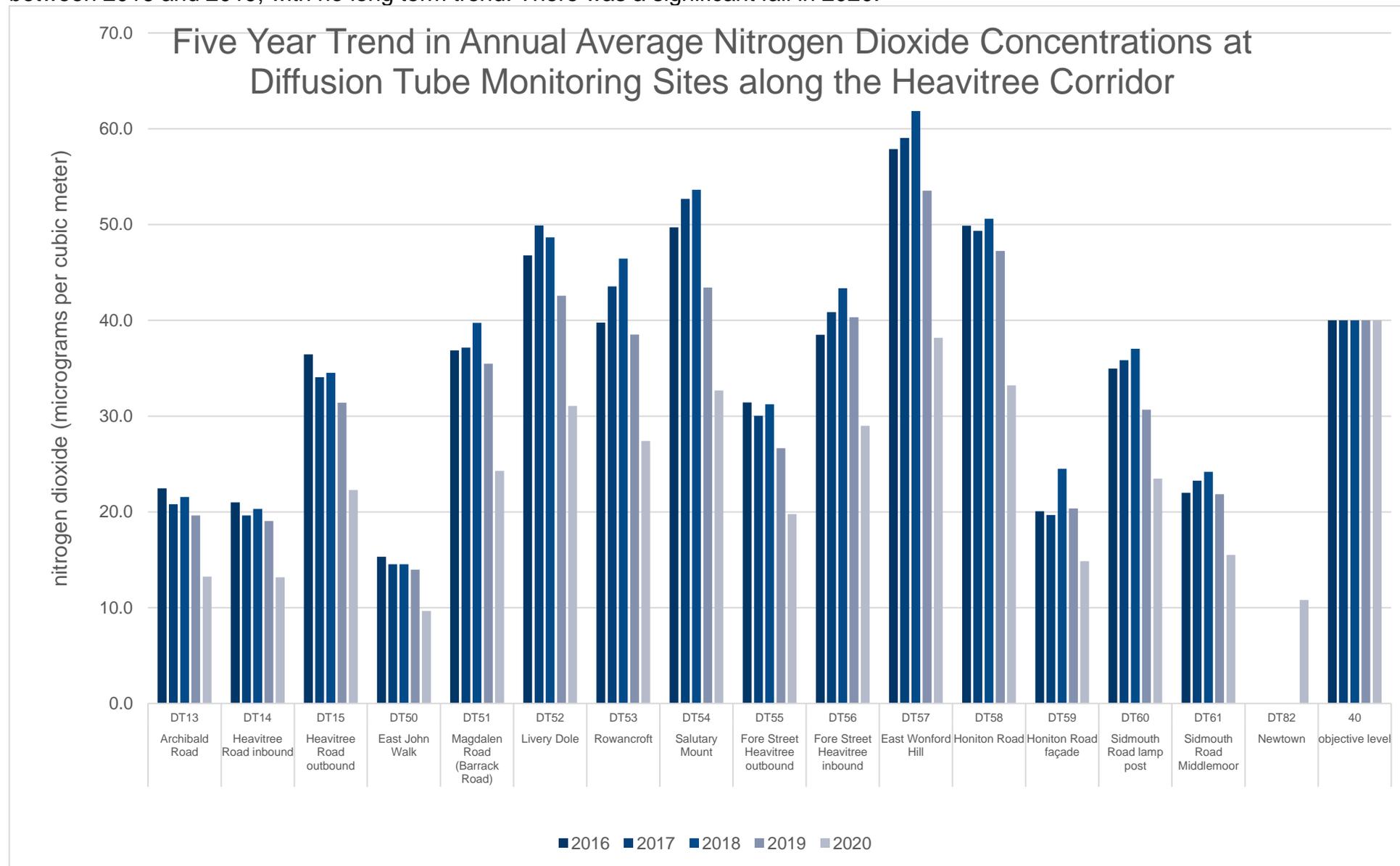
This graph shows the five year trend in concentrations at monitoring sites in the city centre. Concentrations fluctuated slightly between 2016 and 2019, with no long term trend. There was a significant fall in 2020.



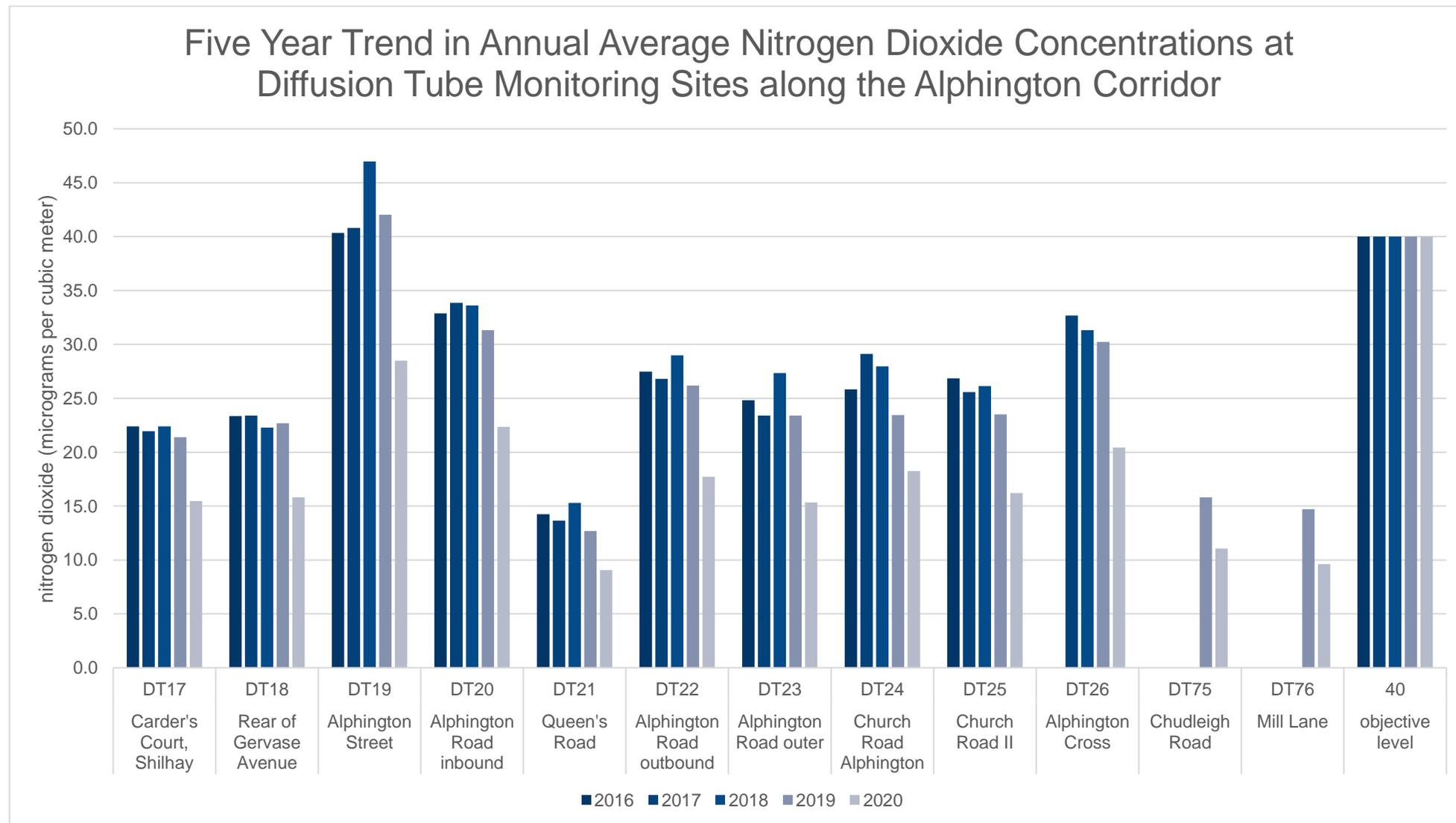
This graph shows the five year trend in concentrations at monitoring sites along the Topsham corridor. Concentrations fluctuated slightly between 2016 and 2019, with no clear long term trend. There was a significant fall in 2020.



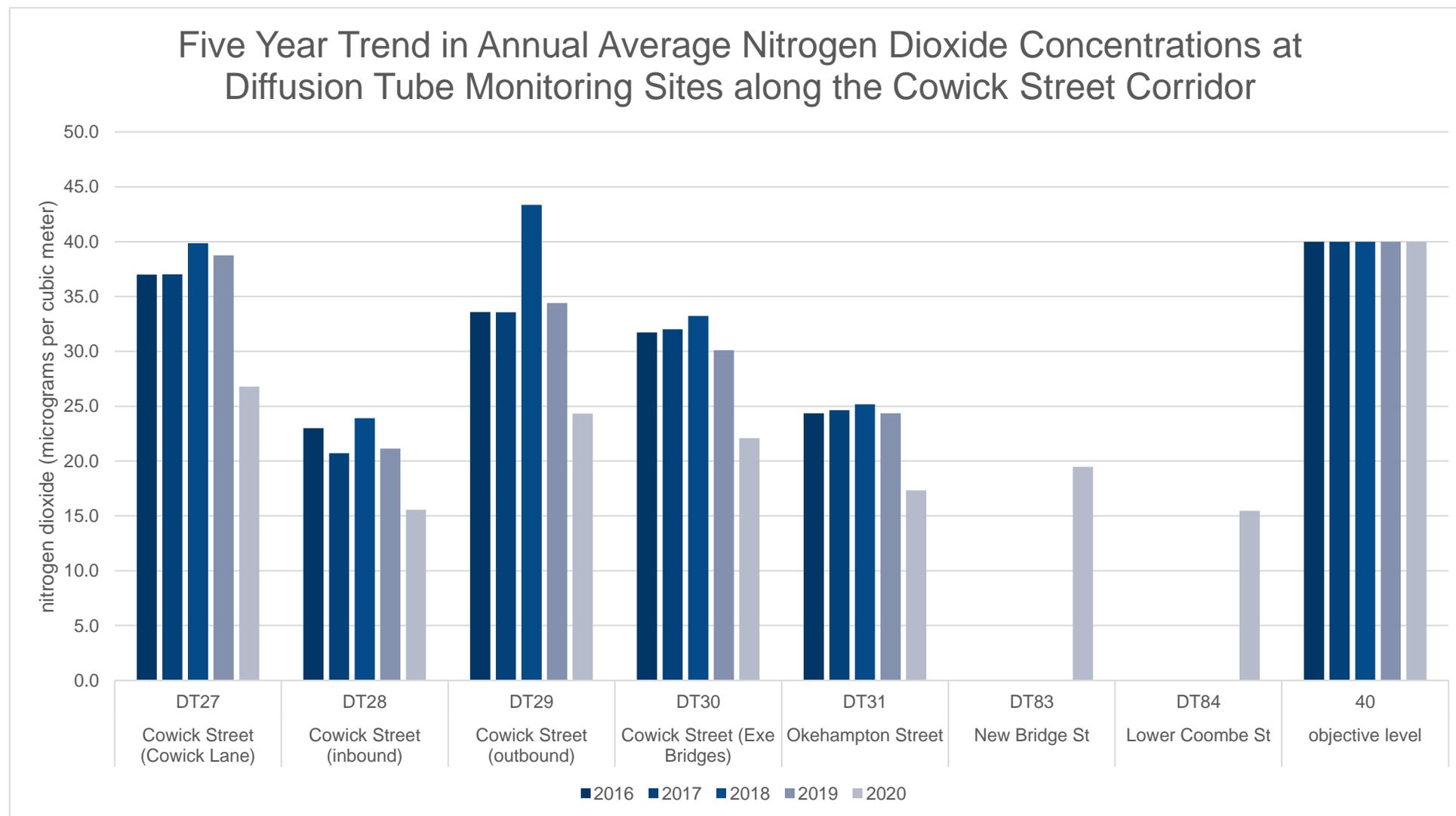
This graph shows the five year trend in concentrations at monitoring sites along the Heavitree corridor. Concentrations fluctuated slightly between 2016 and 2019, with no long term trend. There was a significant fall in 2020.



This graph shows the five year trend in concentrations at monitoring sites along the Alphington corridor. Concentrations fluctuated slightly between 2016 and 2019, with no long term trend. There was a significant fall in 2020.

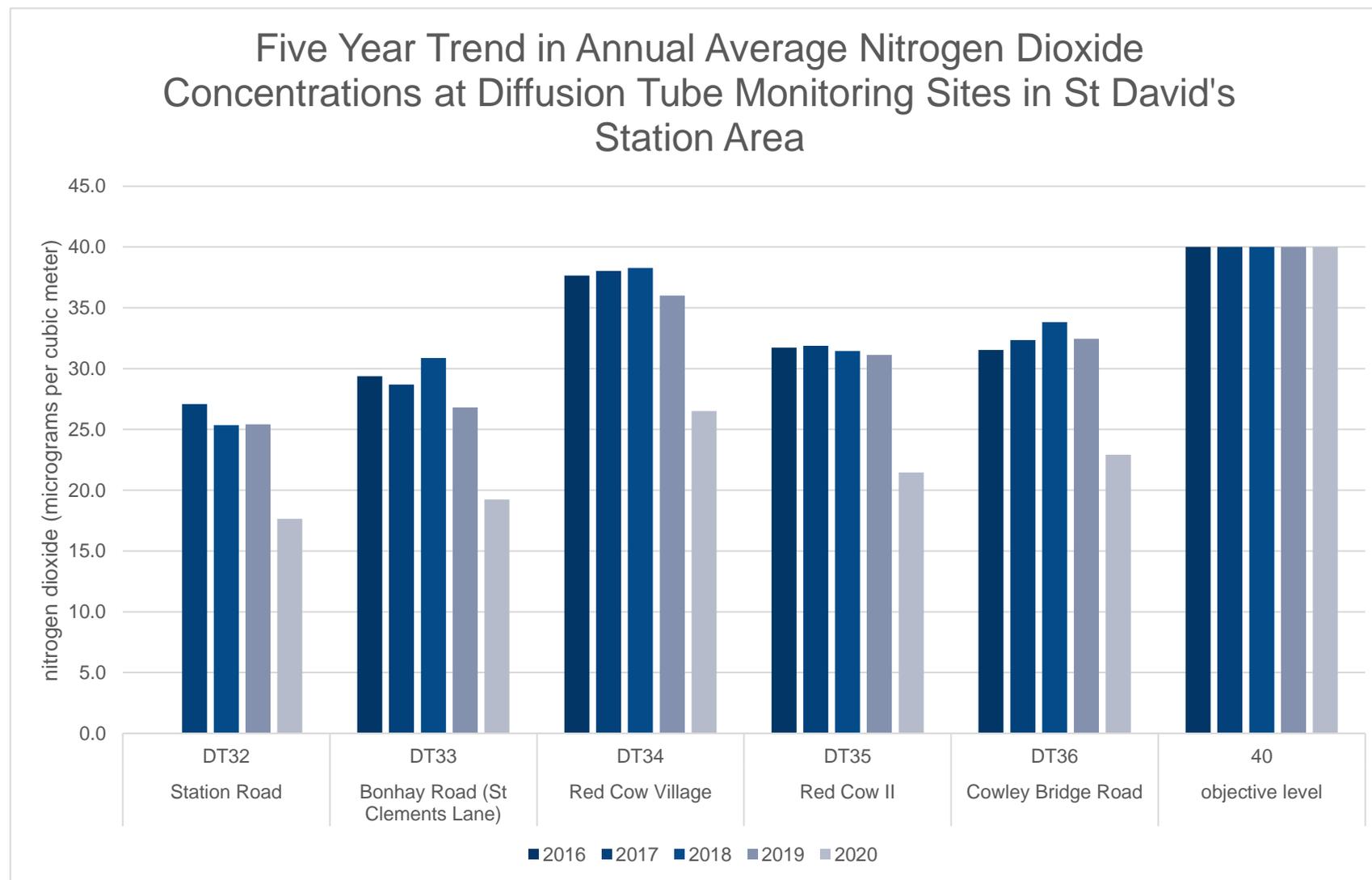


This graph shows the five year trend in concentrations at monitoring sites along the Cowick Street corridor. Concentrations fluctuated slightly between 2016 and 2019, with no long term trend. There was a significant fall in 2020.



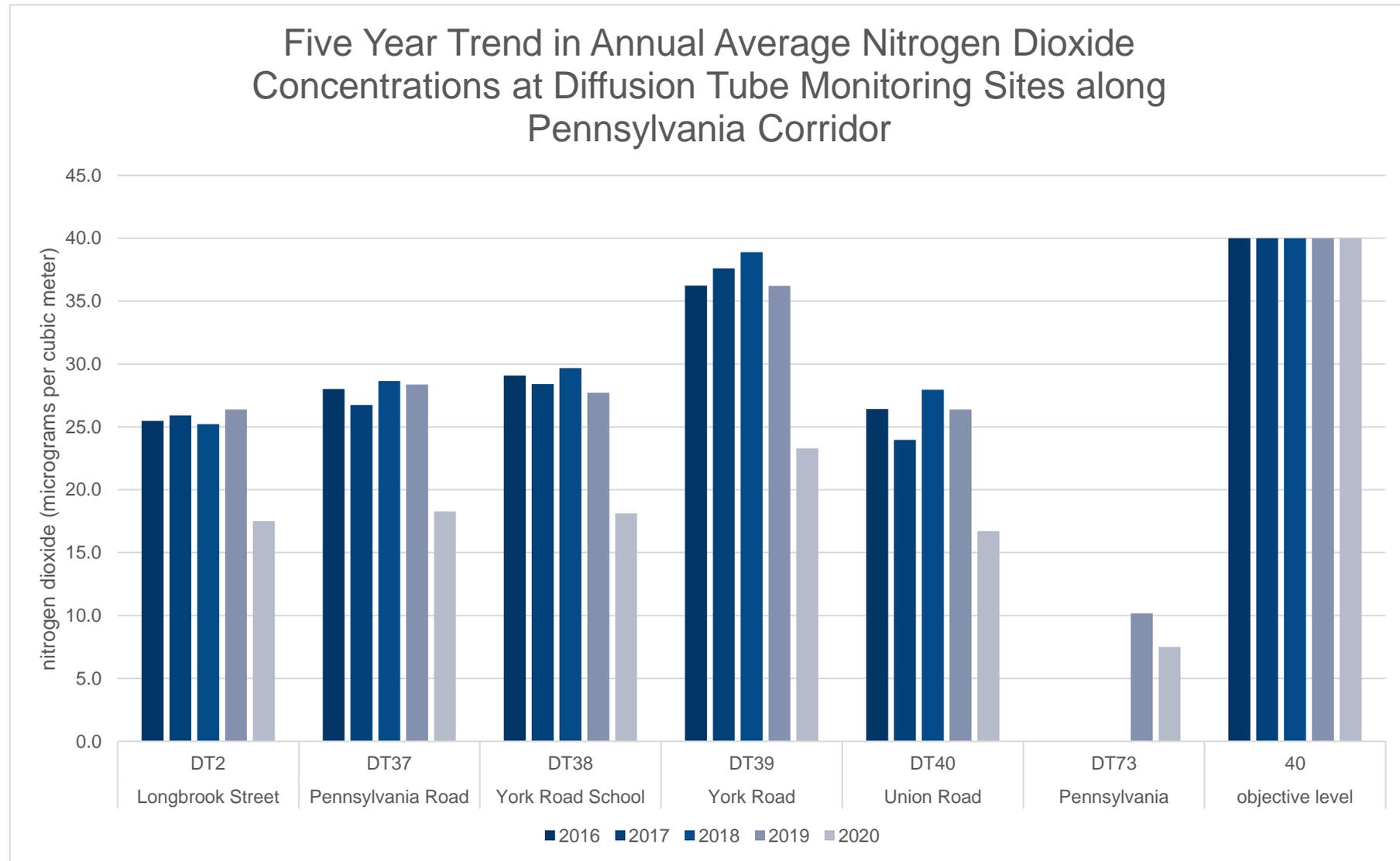
Exeter City Council

This graph shows the five year trend in concentrations at monitoring sites in the St Davids Station area. Concentrations fluctuated slightly between 2016 and 2019, with no long term trend. There was a significant fall in 2020.

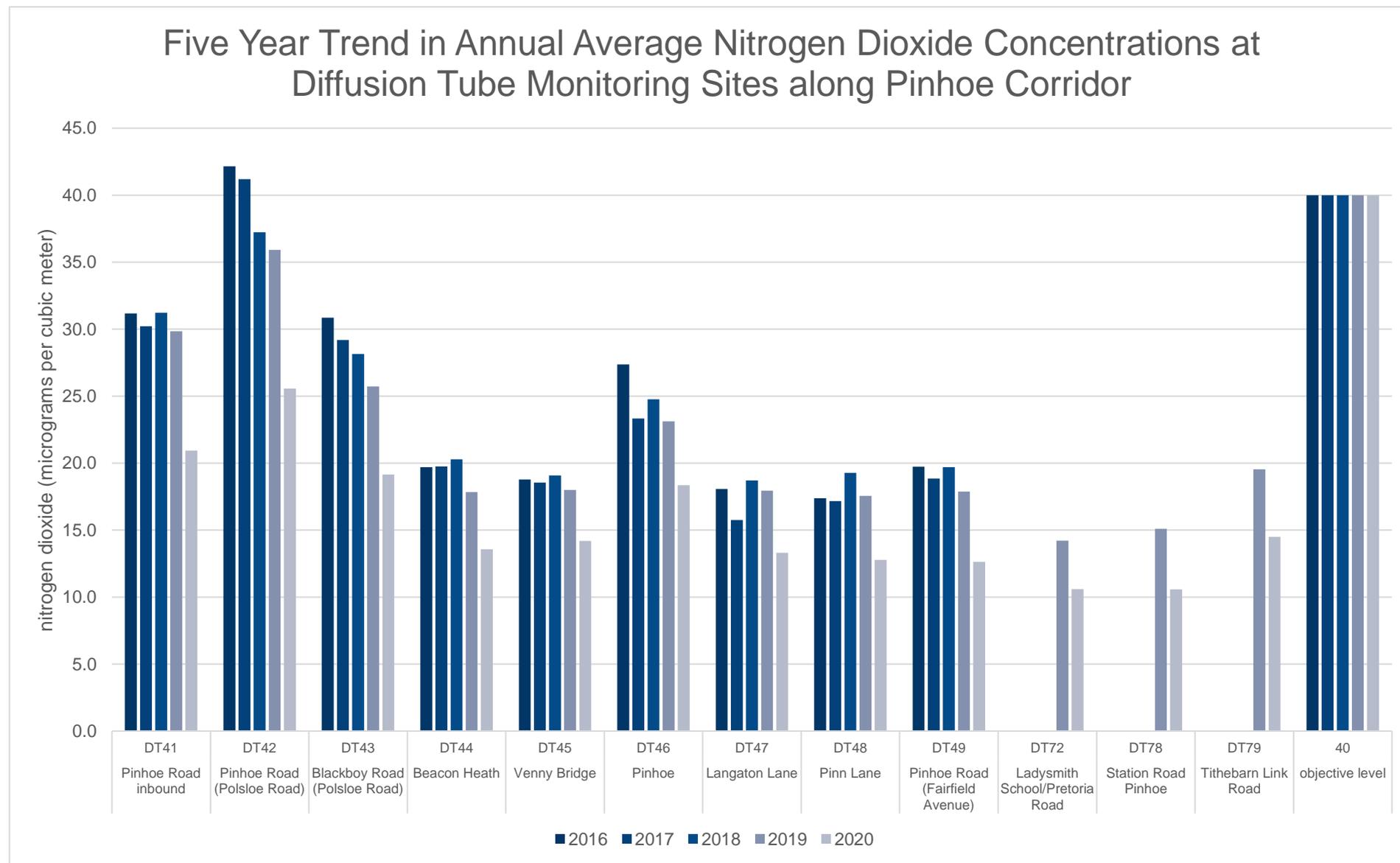


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This graph shows the five year trend in concentrations at monitoring sites along the Pennsylvania corridor. Concentrations fluctuated slightly between 2016 and 2019, with no long term trend. There was a significant fall in 2020.

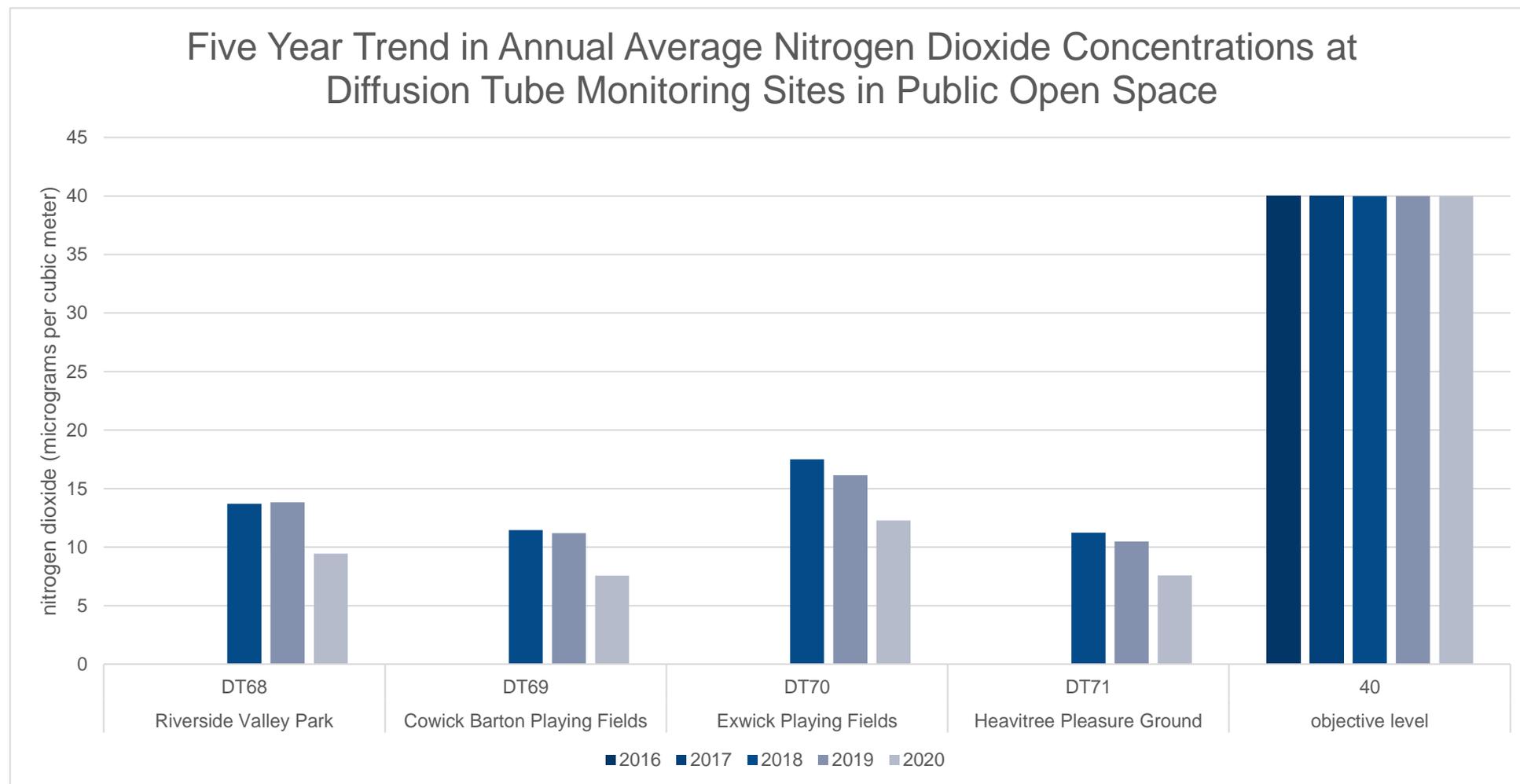


This graph shows the five year trend in concentrations at monitoring sites along the Pinhoe corridor. Concentrations fluctuated slightly between 2016 and 2019, with no long term trend. There was a significant fall in 2020.



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This graph shows the five year trend in concentrations at monitoring sites in public open space. Concentrations fluctuated slightly between 2018 and 2019. There was a significant fall in 2020.



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Table A.5 – 1-Hour Mean NO₂ Monitoring Results, Number of 1-Hour Means > 200µg/m³

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2020 (%) ⁽²⁾	2016	2017	2018	2019	2020
CM1	291939	92830	Kerbside		98.6	0	0	0	0	0

Notes:

Results are presented as the number of 1-hour periods where concentrations greater than 200µg/m³ have been recorded.

Exceedances of the NO₂ 1-hour mean objective (200µg/m³ not to be exceeded more than 18 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the 99.8th percentile of 1-hour means is provided in brackets.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

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Table A.6 – Annual Mean PM₁₀ Monitoring Results (µg/m³)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2020 (%) ⁽²⁾	2016	2017	2018	2019	2020
CM1	291939	92830	Kerbside		99.95	15	18	17.7	15.83	14.07
CM2	291670	91773	Roadside		80.9	15	19	16.7	15.10	11.49

Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG16.

Notes:

The annual mean concentrations are presented as µg/m³.

Exceedances of the PM₁₀ annual mean objective of 40µg/m³ are shown in **bold**.

All means have been “annualised” as per LAQM.TG16 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

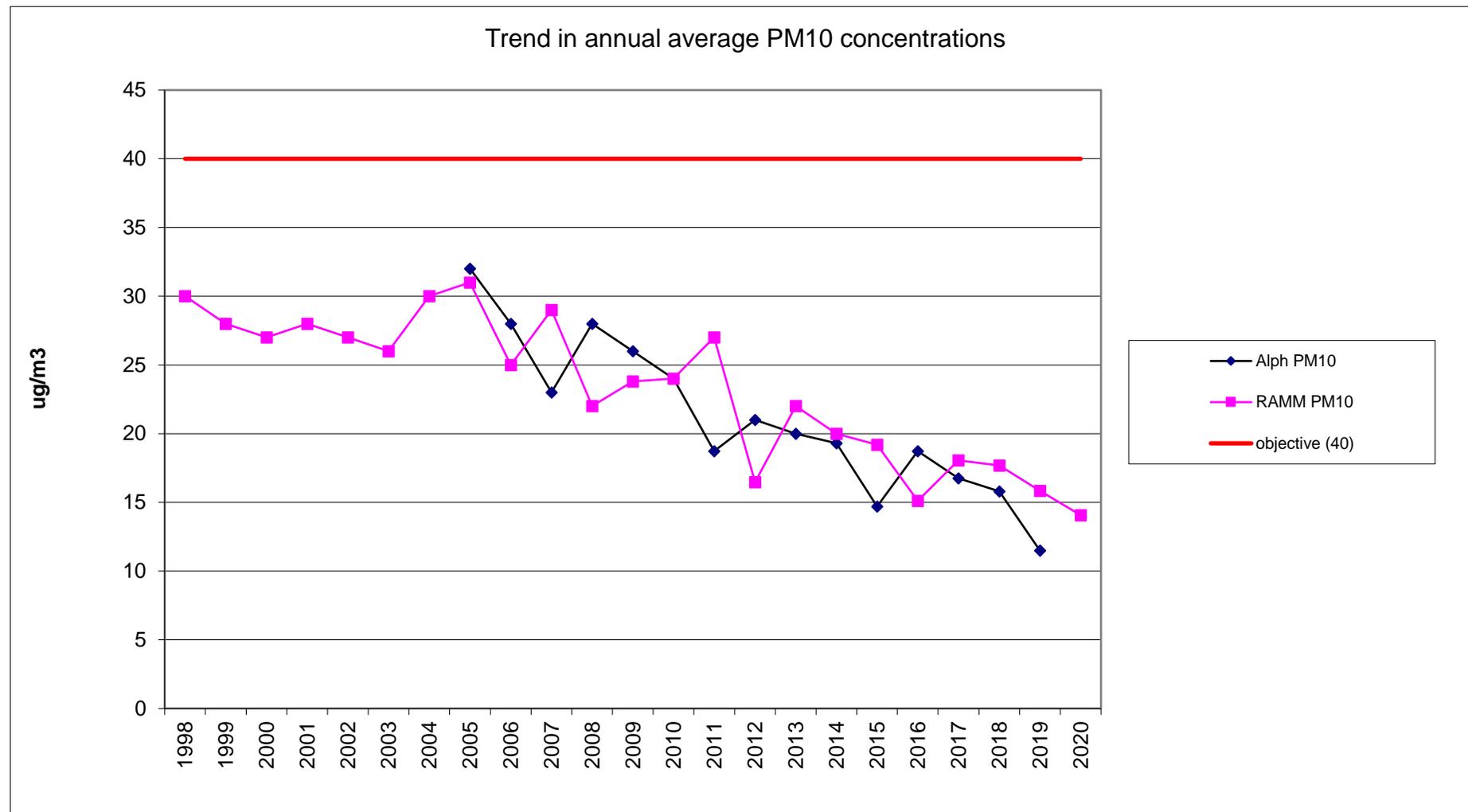
(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

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Figure A.2 – Trends in Annual Mean PM₁₀ Concentrations

This graph shows the trend in mean PM₁₀ concentrations since 1998. These have fallen, particularly since 2005.



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Table A.7 – 24-Hour Mean PM₁₀ Monitoring Results, Number of PM₁₀ 24-Hour Means > 50µg/m³

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2020 (%) ⁽²⁾	2016	2017	2018	2019	2020
CM1	291939	92830	Kerbside		99.95	0	1	0 (28.8)	0 (21.2)	1
CM2	291670	91773	Roadside		80.9	0 (23.7)	2	1	4	0 (19.2)

Notes:

Results are presented as the number of 24-hour periods where daily mean concentrations greater than 50µg/m³ have been recorded.

Exceedances of the PM₁₀ 24-hour mean objective (50µg/m³ not to be exceeded more than 35 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the 90.4th percentile of 24-hour means is provided in brackets.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

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Table A.8 – Annual Mean PM_{2.5} Monitoring Results (µg/m³)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2020 (%) ⁽²⁾	2016	2017	2018	2019	2020
CM1	291939	92830	Kerbside		99.95				9.97	8.6
CM2	291670	91773	Roadside		80.9			9.02	9.48	6.78

Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG16.

Notes:

The annual mean concentrations are presented as µg/m³.

All means have been “annualised” as per LAQM.TG16 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

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Table A.9 – O₃ 2020 Monitoring Results

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2020 (%) ⁽²⁾	2016 O ₃ 8-hour mean > 100 (µg/m ³)	2017 O ₃ 8-hour mean > 100 (µg/m ³)	2018 O ₃ 8-hour mean > 100 (µg/m ³)	2019 O ₃ 8-hour mean > 100 (µg/m ³)	2020 O ₃ 8-hour mean > 100 (µg/m ³)
CM1	291939	92830	Kerbside		98.3	0 (58.0)	0	12	11	87

Notes:

If the period of valid data is less than 85%, the 97th percentile of 8-hour running means is provided in brackets.

Appendix B: Full Monthly Diffusion Tube Results for 2020

Table B.1 – NO₂ 2020 Diffusion Tube Results (µg/m³)

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Easting)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.74	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT1	292199	92814	30.2	27.4	22.1	18.8		17.1	13.0	18.1	24.9	24.4	33.1	28.2	23.0	17.0	-	
DT2	292315	93016	37.0	30.6	20.9	15.5		17.5	16.8	20.6	24.5	26.1	30.9	27.1	23.6	17.5	-	
DT3	292185	93049	35.4	35.1	21.7	17.0		20.5	20.4	24.3	26.4	25.1	31.3	29.4	25.3	18.8	-	
DT4	291779	93011	30.9	22.1	20.0	16.4		17.5	14.4	21.5	24.3	25.2	27.3	24.4	21.8	16.2	-	
DT5	291944	92826	33.8	27.3	22.4	17.3		16.9	17.7	24.3	29.5	29.8	31.2	28.8	-	-	-	Duplicate Site with DT5 and DT6 - Annual data provided for DT6 only
DT6	291944	92826	36.4	27.1	22.1	16.7		16.9	17.9	24.6	29.9	28.8	31.6	30.1	24.9	18.5	-	Duplicate Site with DT5 and DT6 - Annual data provided for DT6 only
DT7	291984	92626	31.0	22.6	21.6	18.6		15.5	11.3	18.0	22.2	23.1	29.5	23.6	21.3	15.7	-	
DT8	291895	92569	41.9	35.9	25.0	19.7		24.1	24.9	31.2	33.9	33.7	38.3	35.5	30.5	22.6	-	
DT9	291943	92511	31.9	29.2	21.2	15.9		20.0	19.9	24.3	28.3	29.3	32.9	31.1	25.2	18.7	-	
DT10	291833	92433	37.3	28.1	21.9	17.2		19.7	17.7	26.8	26.2	28.0	32.5	27.4	25.1	18.6	-	
DT11	292291	92292	39.1	30.1	21.3	16.0		19.4	17.7	25.9	29.0	31.3	33.5	33.4	26.3	19.5	-	
DT12	292422	92320	40.2	36.7	22.8	19.9		21.3	19.9	23.9	30.1	28.3	36.0		27.0	20.0	-	
DT13	292590	92743	27.8	20.7	15.9	13.9		12.8	10.4	15.7	20.0	20.3	25.2	18.9	17.9	13.2	-	
DT14	292832	92731	24.9	16.2	16.7	13.0		12.6	10.5	15.9	20.0	23.1	23.3	22.3	17.8	13.2	-	
DT15	292703	92807	39.2	31.3	26.3	23.3		26.2	21.5	28.6	34.7	31.3	39.6	35.1	30.1	22.3	-	
DT16	292378	92039	41.0	31.0	24.0	17.7		19.6	20.0	27.4	34.3	31.8	36.8	40.9	28.7	21.3	-	
DT17	291699	92091	28.4	24.2	19.8	13.3		14.5	16.2	19.4	23.5	25.2	23.4	26.4	20.9	15.5	-	
DT18	291657	91973	29.2	26.5	18.8	14.0		15.7	14.8	21.3	23.8	24.2	26.7	25.2	21.3	15.8	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Easting)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.74	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT19	291669	91812	40.4	34.5	33.2	30.3		34.7	30.5	44.3	45.3	42.1	49.2	43.6	38.5	28.5	-	
DT20	291532	91349	38.5	32.6	25.9	18.9		23.1	25.4	30.9	34.1	35.1	36.8	37.9	30.2	22.4	-	
DT21	291460	91390	17.7	9.6	12.3	9.5		8.8	5.4	11.5	11.9	13.8	17.7	17.5	12.2	9.1	-	
DT22	291509	91151	31.0	21.4	21.1	19.2		23.0	15.4	26.7	26.6	24.3	32.0	25.8	23.9	17.7	-	
DT23	291518	90813	28.6	19.4	18.3	15.5		15.6	11.1	22.4	21.1	22.2	29.4	27.6	20.7	15.3	-	
DT24	291691	90425		32.2	21.2	15.5		19.8	19.9	22.4	29.7	29.7	33.1	29.3	24.6	18.3	-	
DT25	291767	90160	32.2	20.8	20.2	15.4		16.2	14.1	21.9	24.4	23.8	27.7	28.4	21.9	16.2	-	
DT26	291520	90531	36.8	37.7	24.5	16.1		20.4	21.8	26.1	32.2	31.4	34.1	31.1	27.6	20.4	-	
DT27	290864	91725	49.0	45.6	31.1	25.7		30.7	26.7	36.6	37.1	35.9	44.8	43.2	36.2	26.8	-	
DT28	291249	91874	29.3	19.6	20.3	15.2		16.0	14.0	19.9	25.1	22.7	26.4	26.4	21.0	15.6	-	
DT29	291376	91944	41.1	36.2	30.3	26.2		28.3	21.7	33.2	36.6	32.9	41.1	38.8	32.8	24.3	-	
DT30	291500	92055	39.8	36.3	26.9	20.5		23.8	24.5	30.2		32.7	33.5	36.4	29.8	22.1	-	
DT31	291351	92169	29.0	29.4	22.2	17.2		19.3	16.7	22.4	27.7	24.3	28.8	25.3	23.4	17.3	-	
DT32	290830	96598	33.3	29.1	18.2	16.9		20.8	16.2	24.1	24.8	25.8	30.7	28.6	23.8	17.7	-	
DT33	291253	93299	36.5	30.8	23.6	17.9		19.2	18.1	23.9	33.5	28.0	31.5	29.8	26.0	19.2	-	
DT34	291242	93483	44.7	44.0	28.3	25.4		29.0	27.4	37.4	43.1	39.6	44.8	39.9	35.8	26.5	-	
DT35	291272	93468	39.5	36.0	23.8	18.6		21.9	20.9	29.3	34.9	33.2	36.6	32.6	29.0	21.5	-	
DT36	291054	94399	44.1	42.2	27.2	20.1		24.3	20.2	27.6	35.3	31.4	39.5	37.7	30.9	22.9	-	
DT37	292391	93291	36.8	26.7	21.4	17.2		20.0	14.4	22.7	24.8	29.6	34.9	28.5	24.7	18.3	-	
DT38	292469	93245	38.1	27.9	21.5	16.8		18.5	15.1	21.0	29.1	28.8	33.2	26.4	24.5	18.1	-	
DT39	292579	93146	40.0	32.7	26.9	21.3		24.0	21.6	29.3	41.0	37.5	42.2	37.4	31.4	23.3	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Easting)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.74	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT40	293047	93877	29.7	26.1	19.6	17.3		19.4	14.5	22.8	24.2	24.2	30.5	24.6	22.6	16.7	-	
DT41	293405	93395	39.9	35.2	24.1	20.5		23.8	18.5	25.5	29.0	30.9	37.1	33.6	28.3	20.9	-	
DT42	293251	93375	46.9	39.9	30.5	23.0		28.9	24.0	35.3	38.5	37.2	43.8	40.0	34.5	25.6	-	
DT43	293227	93356	34.9	34.9	17.0	17.3		20.5	22.0	23.4	30.5	28.9	33.6	31.5	25.9	19.2	-	
DT44	295068	94487	25.6	24.1	15.8	12.2		14.5	11.6	17.1	18.1	20.4	24.3	22.7	18.3	13.6	-	
DT45	295888	94101	24.9	22.4	16.9	14.4		14.8	13.7	18.2	22.3	19.2	27.2	21.8	19.2	14.2	-	
DT46	296418	94470	35.4	33.1	20.9	11.0		18.1	20.0	22.7	28.6	28.3	33.7	31.0	24.8	18.4	-	
DT47	296984	94327	28.2	19.5	15.0	10.9		13.7		16.5	16.6	19.1	24.4	21.9	18.0	13.3	-	
DT48	296494	93782	23.5	19.6	16.3	11.1		13.4	9.7	16.1	17.3	18.6	24.0	23.6	17.3	12.8	-	
DT49	295413	93689	26.1	18.9	16.4	12.9		12.9	9.2	15.0	19.4	18.5	21.8	20.0	17.1	12.6	-	
DT50	293091	92825	20.5	15.1	13.2	9.1		8.2	6.8	10.1	13.1	15.0	19.1	16.4	13.0	9.7	-	
DT51	293448	92419	40.2	35.0	33.9	23.7		27.9	20.5	29.9	34.4	34.0	44.6	40.8	32.8	24.3	-	
DT52	293418	92497	51.3	61.5	36.7	27.8		31.5	34.4	39.6	50.4		51.1	48.4	41.9	31.1	-	
DT53	293533	92473	48.5	45.9	30.6	28.9		27.9	29.3	35.5	45.1	38.7	42.1	43.9	37.0	27.4	-	
DT54	293738	92396	53.0	53.6	37.6	29.3		38.1		48.4	46.8	43.4	52.0	50.0	44.1	32.7	-	
DT55	293781	92409	26.8	31.6	23.3	17.4		20.2	17.9	23.1	28.7	27.4	32.1	49.5	26.7	19.8	-	
DT56	294043	92359	51.2	53.8	37.7	24.8		34.4	28.4	37.8	39.0	41.1	53.4		39.2	29.0	-	
DT57	294410	92310	66.3	68.2	40.9	38.2		46.7	42.5	55.3	54.1	53.4	58.9	55.2	51.6	38.2	-	
DT58	295203	92378	53.8	52.0	41.3	31.5		38.1	36.6	47.1	45.6	49.0	56.1	50.4	44.8	33.2	-	
DT59	295191	92395	27.8	20.7	19.9	16.7		16.6	11.9	18.5	22.3	21.1	25.0	22.8	20.0	14.8	-	
DT60	295466	92365	41.8	32.8	30.0	26.6		26.8	21.3	30.2	37.9	31.4	39.5	35.9	31.7	23.5	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Easting)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.74	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT61	295636	92232	29.2	22.0	18.3	15.3		18.3	14.8	20.0	23.6	21.1	26.7	25.7	20.9	15.5	-	
DT62	295710	90571	22.9	14.1	13.9	11.8		11.7	9.4	13.6	17.9	16.8	22.8	18.8	15.5	11.5	-	
DT63	294694	90001	30.6	31.0	22.1	15.9		19.6	20.9	22.6	30.1	27.0	31.6	25.1	24.5	18.1	-	
DT64	294652	89974	36.0	24.6	21.2	16.5		17.4	18.2	20.2	28.2	29.4	31.5	28.0	24.0	17.8	-	
DT65	296415	88477	29.6	19.9	21.0	19.5		20.3	16.8	24.4	29.8	23.0	28.5	25.9	23.2	17.2	-	
DT66	294227	90435	46.0	37.3	29.1	23.5		29.5	26.9	33.6	37.1	38.4	40.0	37.7	33.8	25.0	-	
DT67	293213	91245	27.7	19.1	19.2	15.9		18.8		21.8	20.7	22.5	27.0	25.3	21.4	15.9	-	
DT68	292291	91678	18.8	11.8	13.1	8.9		9.5	6.6	11.0	12.5	14.6	20.6	15.3	12.8	9.4	-	
DT69	291016	91304	16.1	8.8	10.3	7.2		7.4	4.8	8.8	10.4	9.0	16.0	15.4	10.2	7.6	-	
DT70	291298	92593	20.4	14.3	17.2	13.0		12.3	9.6	16.2	19.3	17.9	22.9	21.1	16.6	12.3	-	
DT71	294387	92611	17.1	11.2	10.1	7.4		6.8	5.4	8.7	10.2		14.8	13.3	10.2	7.6	-	
DT72	293617	93090	22.1	16.3	13.5	9.0		9.5	8.1	11.9	14.3	16.6	20.8	19.0	14.3	10.6	-	
DT73	293052	94185	16.6	11.5	9.2	7.1			4.5	8.4	8.6	10.9	14.5	12.1	10.1	7.5	-	
DT74	292056	93043		13.1		8.7		8.1	5.8	9.9	12.1	12.7	17.5	14.8	11.3	8.3	-	
DT75	291721	89727	22.3	12.5	14.8	11.1		11.5	10.3	14.7	16.2	16.1	19.2	18.2	14.9	11.1	-	
DT76	291555	90449	21.9	13.7	13.0	9.8		9.3	8.6	12.6	13.1	8.9	16.4	18.4	13.0	9.6	-	
DT77	292553	93082	34.8	34.5	26.3	17.8		15.8	17.1	22.4	28.4	25.1	32.1	28.8	25.2	18.6	-	
DT78	296415	94165	13.9	18.0	14.1	11.3		10.5	8.8	13.7	16.4	15.4	21.2	16.3	14.3	10.6	-	
DT79	296827	93886	27.4	20.3	16.9	14.3		20.0	10.5	18.2	20.9	19.3	27.4	23.9	19.6	14.5	-	
DT80	295967	88876	26.5	19.7	17.3	14.2		14.7	14.3	17.9	23.7	21.3	24.5	22.3	19.2	14.3	-	
DT81	292637	91991	23.2	15.4	14.5	9.8		10.2	8.3	11.9	15.7	16.4	22.3	22.0	15.1	11.2	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Easting)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.74	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT82	292847	92911	22.4	18.7	13.5	9.5		9.0	7.8	11.4	14.3	17.5	21.6	19.2	14.6	10.8	-	
DT83	291655	92258	34.0	28.4	22.5	19.5		20.9	20.0	25.3	30.0	29.6	32.1	32.6	26.3	19.5	-	
DT84	291897	92217	26.4	24.2	18.1	14.1		14.0	15.1	19.8	25.9	25.3	24.4	27.6	20.9	15.5	-	

- All erroneous data has been removed from the NO₂ diffusion tube dataset presented in Table B.1.
- Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG16.
- Local bias adjustment factor used.
- National bias adjustment factor used.
- Where applicable, data has been distance corrected for relevant exposure in the final column.
- Exeter City Council confirm that all 2020 diffusion tube data has been uploaded to the Diffusion Tube Data Entry System.

Notes:

Exceedances of the NO₂ annual mean objective of 40µg/m³ are shown in **bold**.

NO₂ annual means exceeding 60µg/m³, indicating a potential exceedance of the NO₂ 1-hour mean objective are shown in **bold and underlined**.

See Appendix C for details on bias adjustment and annualisation.

Appendix C: Supporting Technical Information / Air Quality Monitoring Data QA/QC

New or Changed Sources Identified Within Exeter City Council During 2020

Exeter City Council has not identified any new sources relating to air quality within the reporting year of 2020.

Additional Air Quality Works Undertaken by Exeter City Council During 2020

Exeter City Council has not completed any additional works within the reporting year of 2020.

QA/QC of Diffusion Tube Monitoring

Exeter City Council uses Gradko diffusion tubes (20% TEA in water). Gradko (GRADKO International Ltd., St. Martins House, 77 Wales Street, Winchester, Hants. SO23 0RH) laboratories hold UKAS accreditation, follow the procedures set out in the Harmonisation Practical Guidance and their performance was satisfactory in the centralised AIR NO₂ PT scheme for quality assurance and quality control.

The tube exposure period used generally follows the timetable provided by the Air Quality Support Helpdesk, i.e. an exposure time of 4 or 5 weeks, with an allowed variation in exposure time of ± 2 days. During 2020, it was not possible to follow this all year because Gradko stopped sending out new tubes for a period. The following adjustments were made, to allow the Council to obtain continuous data throughout the year with only minor adjustments to the exposure calendar and remaining within guidance for tube use:

- January: tubes exposed as per calendar
- February: tubes exposed as per calendar

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- March: tubes were put out as per the calendar but were left out 2 weeks beyond the calendar collection date. This meant an exposure period of 6 weeks, which is still within guidelines for use of diffusion tubes.
- April: the tubes were put out 2 weeks later than expected and were left out for six weeks, covering the second half of April and all of May. These tubes were collected on the date when the May tubes should have been collected.
- May: data was obtained for May as described above.
- June: tubes exposed as per calendar
- July: tubes exposed as per calendar
- August: tubes exposed as per calendar
- September: tubes exposed as per calendar
- October: tubes exposed as per calendar
- November: tubes exposed as per calendar
- December: tubes exposed as per calendar

The tubes are stored in a fridge before they are exposed. Location sites and fixings follow the recommendations in the DEFRA practical guidance on the use of diffusion tubes for NO₂ monitoring, published in 2008. Two tubes are collocated with the continuous analyser at the Royal Albert Memorial Museum (RAMM), Queen Street (Exeter Roadside).

Data from the tubes are ratified and suspect data rejected by Exeter City Council, following the procedure in the DEFRA practical guidance. Random checks of the data in the reporting spreadsheet are also undertaken to ensure that no mistakes were made when inputting the data. Analysis of the data from the two tubes that are co-located with the continuous analyser shows that these have overall good precision.

Diffusion Tube Annualisation

All diffusion tube monitoring locations within Exeter City Council recorded data capture of 75% therefore it was not required to annualise any monitoring data.

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Diffusion Tube Bias Adjustment Factors

The diffusion tube data presented within the 2020 ASR have been corrected for bias using an adjustment factor. Bias represents the overall tendency of the diffusion tubes to under or over-read relative to the reference chemiluminescence analyser. LAQM.TG16 provides guidance with regard to the application of a bias adjustment factor to correct diffusion tube monitoring. Co-location studies can be used to determine a local bias factor based on the comparison of diffusion tube results with data taken from NO_x/NO₂ continuous analysers. Alternatively, the national database of diffusion tube co-location surveys provides bias factors for the relevant laboratory and preparation method.

Exeter City Council have applied a local bias adjustment factor of 0.74 to the 2020 monitoring data (Table C.2). This means that the diffusion tubes over-estimate actual concentrations when compared to the reference method. This factor is derived from the co-located diffusion tubes at the RAMM continuous analyser (CM1). The national bias adjustment factor is 0.81 which has been obtained from the spreadsheet version 03/21, for Gradko diffusion tubes (20% TEA in water) using 18 studies.

The local factor was chosen because the Exeter RAMM co-located tubes show good overall precision and data capture and are thought to be representative of local conditions. A summary of bias adjustment factors used by Exeter City Council over the past five years is presented in Table C.1. This has always been the local factor, except in 2018 when data capture for the continuous analyser was low.

Table C.1 – Bias Adjustment Factor

Year	Local or National	If National, Version of National Spreadsheet	Adjustment Factor
2020	Local	-	0.74
2019	Local	-	0.89
2018	National	03/19	0.93
2017	Local	-	0.85
2016	Local	-	0.87

NO₂ Fall-off with Distance from the Road

Wherever possible, local authorities should ensure that monitoring locations are representative of exposure. However, where this is not possible, the NO₂ concentration at the nearest location relevant for exposure should be estimated using the Diffusion Tube

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Data Processing Tool/NO₂ fall-off with distance calculator available on the LAQM Support website. Where appropriate, non-automatic annual mean NO₂ concentrations corrected for distance are presented in Table B.1.

No diffusion tube NO₂ monitoring locations within Exeter City Council required distance correction during 2020.

QA/QC of Automatic Monitoring

Neither of the two PM analysers are part of the national network, however recommended QA/QC procedures from the AURN Local Site Operator's manual are followed. Horiba also service each analyser every six months. Data capture at the Alphington Street site for both PM₁₀ and PM_{2.5} was affected by instrument malfunction in 2020, which took longer than normal to resolve as a result of lockdown. This can clearly be seen in C.4.3 and C.4.4. The data for Alphington Street was above 75% however so did not require annualisation.

Live PM10 and PM2.5 data is available at this [page](#).

The PM data is collected, validated and ratified by Exeter City Council. Validation involves checking the data daily for instrumentation errors etc. and then visually screening the data on a weekly basis to mark any obviously spurious or unusual measurements. The Council also undertakes data ratification on an approximately three monthly basis as well as following site services. This involves:

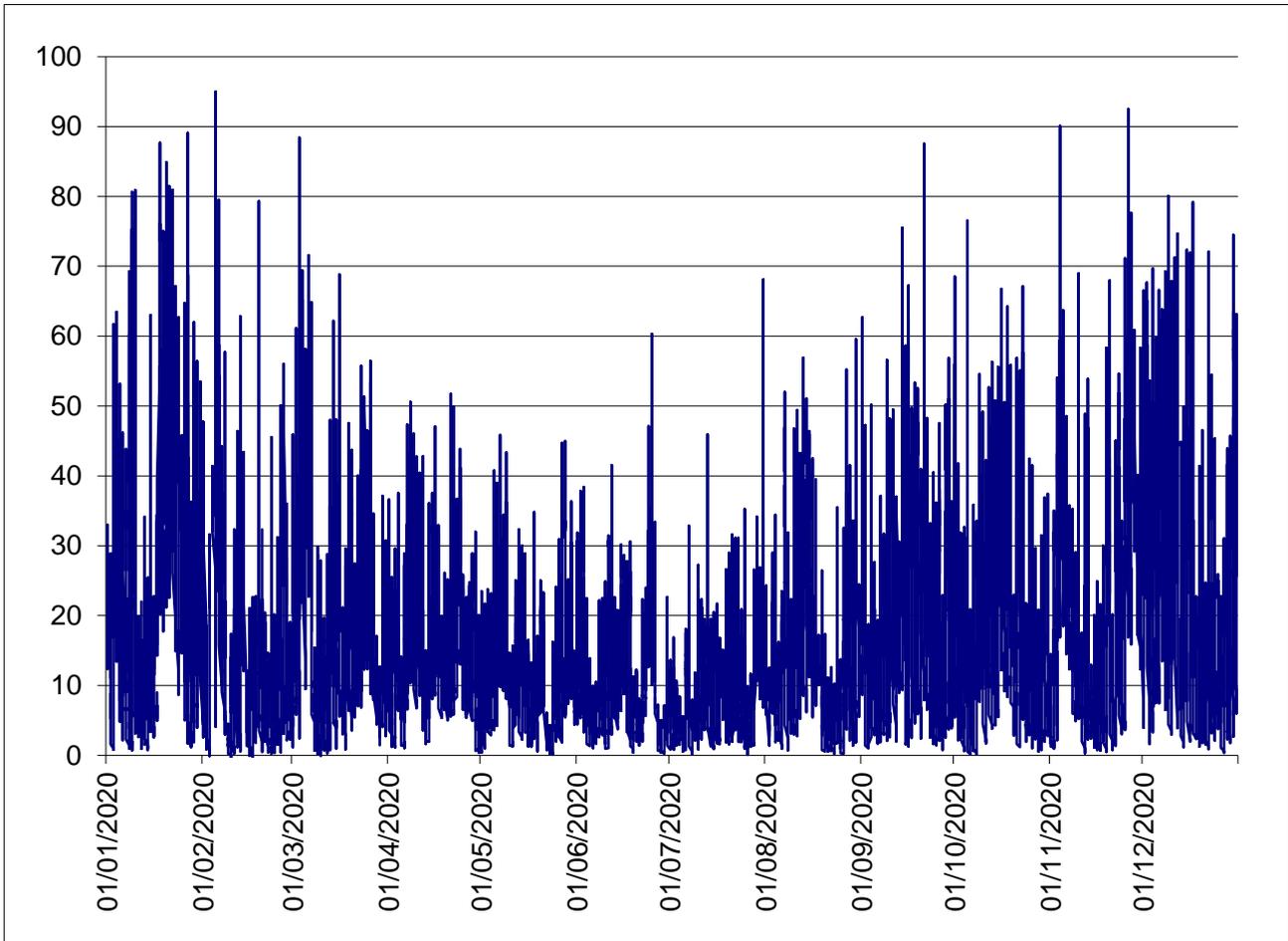
- Comparison of data with other pollutants and other appropriate AURN network sites (roadside sites and other sites in the south west),
- Final checking and deletion of data marked as possibly erroneous,
- Removal of data from unrepresentative periods of operation (e.g. road works in immediate vicinity of site etc. where data is shown or believed to have been affected),
- Adjustment for issues identified during services etc.

The NO₂ data from Exeter Roadside is collected and ratified by the AURN. Network data from the site can be found at [this link](#). It is ratified every 3 months by NETCEN, and is reported in the QA / QC Data Ratification Report for the Automatic Urban Network. Data capture from the NO₂ analyser was 91% in 2019.

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Plots of hourly average values for nitrogen dioxide, PM₁₀ and PM_{2.5} are shown below in figures C.1, C.2 and C.3.

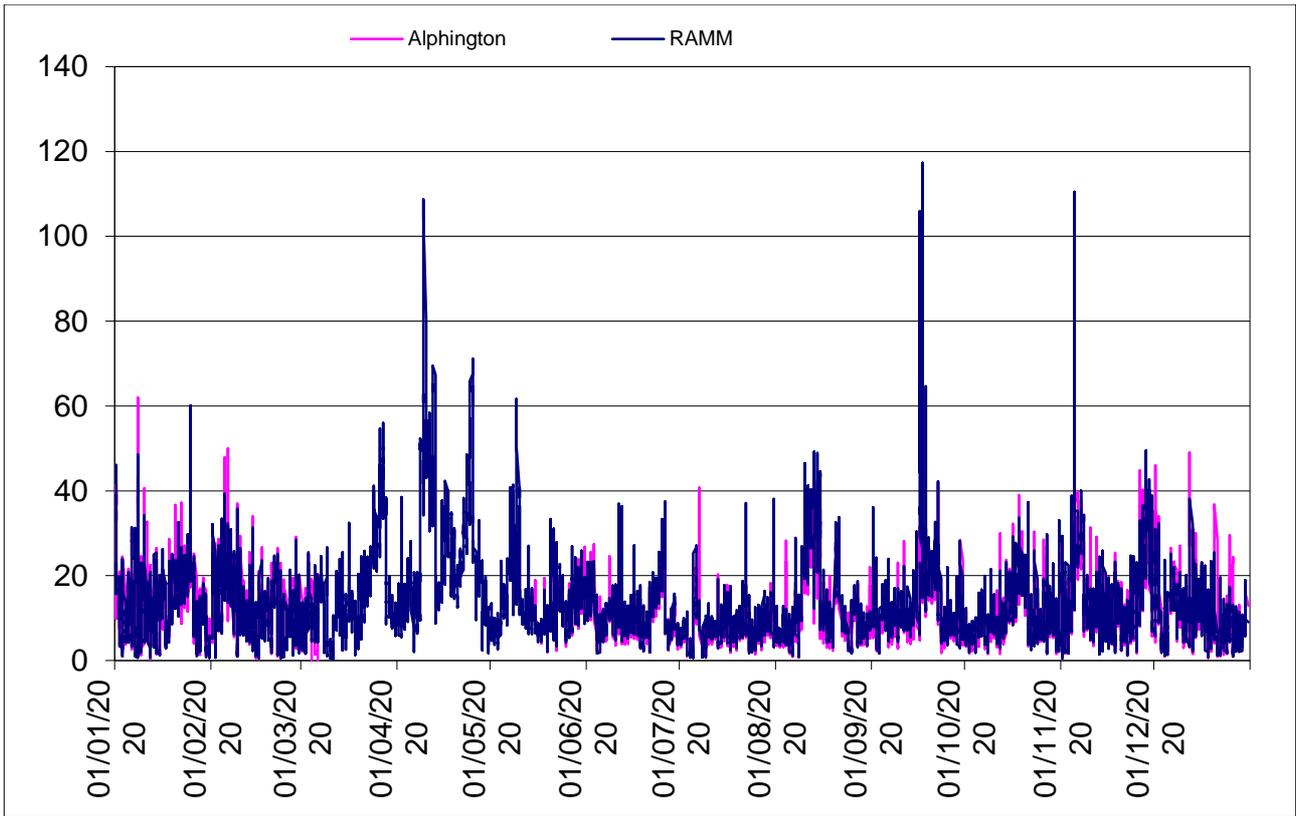
Figure C.1 Hourly NO₂ data from Exeter Roadside (RAMM) ($\mu\text{g}/\text{m}^3$)



This graph shows the hourly NO₂ data from the RAMM continuous analyser.

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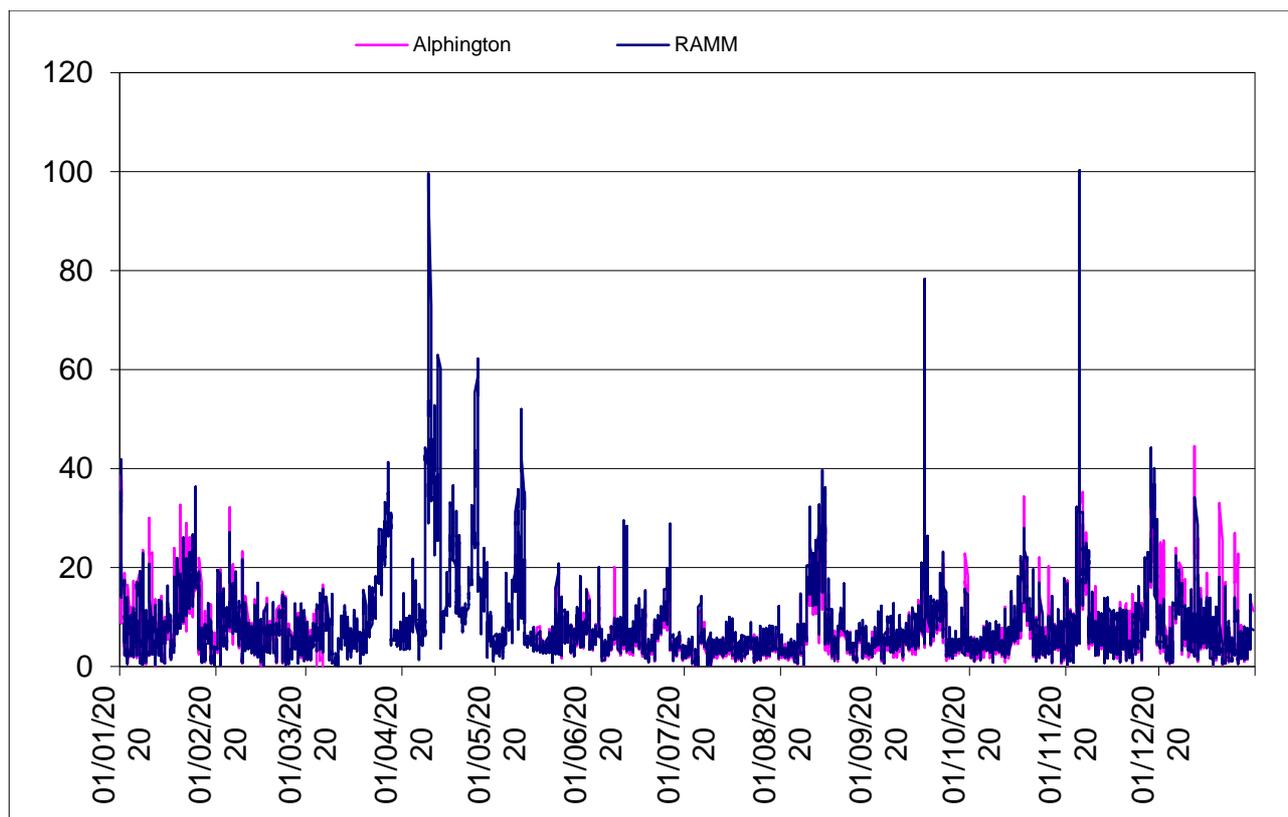
Figure C.2 Hourly PM₁₀ data from Exeter Roadside (RAMM) ($\mu\text{g}/\text{m}^3$)



This graph shows the hourly PM₁₀ data from the RAMM continuous analyser.

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Figure C.3 Hourly PM_{2.5} data from Exeter Roadside (RAMM) ($\mu\text{g}/\text{m}^3$)



This graph shows the hourly PM_{2.5} data from the RAMM continuous analyser.

PM₁₀ and PM_{2.5} Monitoring Adjustment

The type of PM₁₀/PM_{2.5} monitors utilised within Exeter do not require the application of a correction factor.

Automatic Monitoring Annualisation

All automatic monitoring locations within Exeter City Council recorded data capture of greater than 75% therefore it was not required to annualise any monitoring data.

NO₂ Fall-off with Distance from the Road

Wherever possible, local authorities should ensure that monitoring locations are representative of exposure. However, where this is not possible, the NO₂ concentration at the nearest location relevant for exposure should be estimated using the NO₂ fall-off with distance calculator available on the LAQM Support website. Where appropriate, non-

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automatic annual mean NO₂ concentrations corrected for distance are presented in Table B.1.

No automatic NO₂ monitoring locations within Exeter City Council required distance correction during 2020.

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Table C.2 – Local Bias Adjustment Calculation

	Local Bias Adjustment Input 1
Periods used to calculate bias	11
Bias Factor A	0.74 (0.69 - 0.81)
Bias Factor B	35% (24% - 46%)
Diffusion Tube Mean ($\mu\text{g}/\text{m}^3$)	25.5
Mean CV (Precision)	1.7%
Automatic Mean ($\mu\text{g}/\text{m}^3$)	18.9
Data Capture	99%
Adjusted Tube Mean ($\mu\text{g}/\text{m}^3$)	19 (18 - 21)
	Good Overall Precision
	Good Overall Data Capture
Combined Local Bias Adjustment Factor	0.74

Notes:

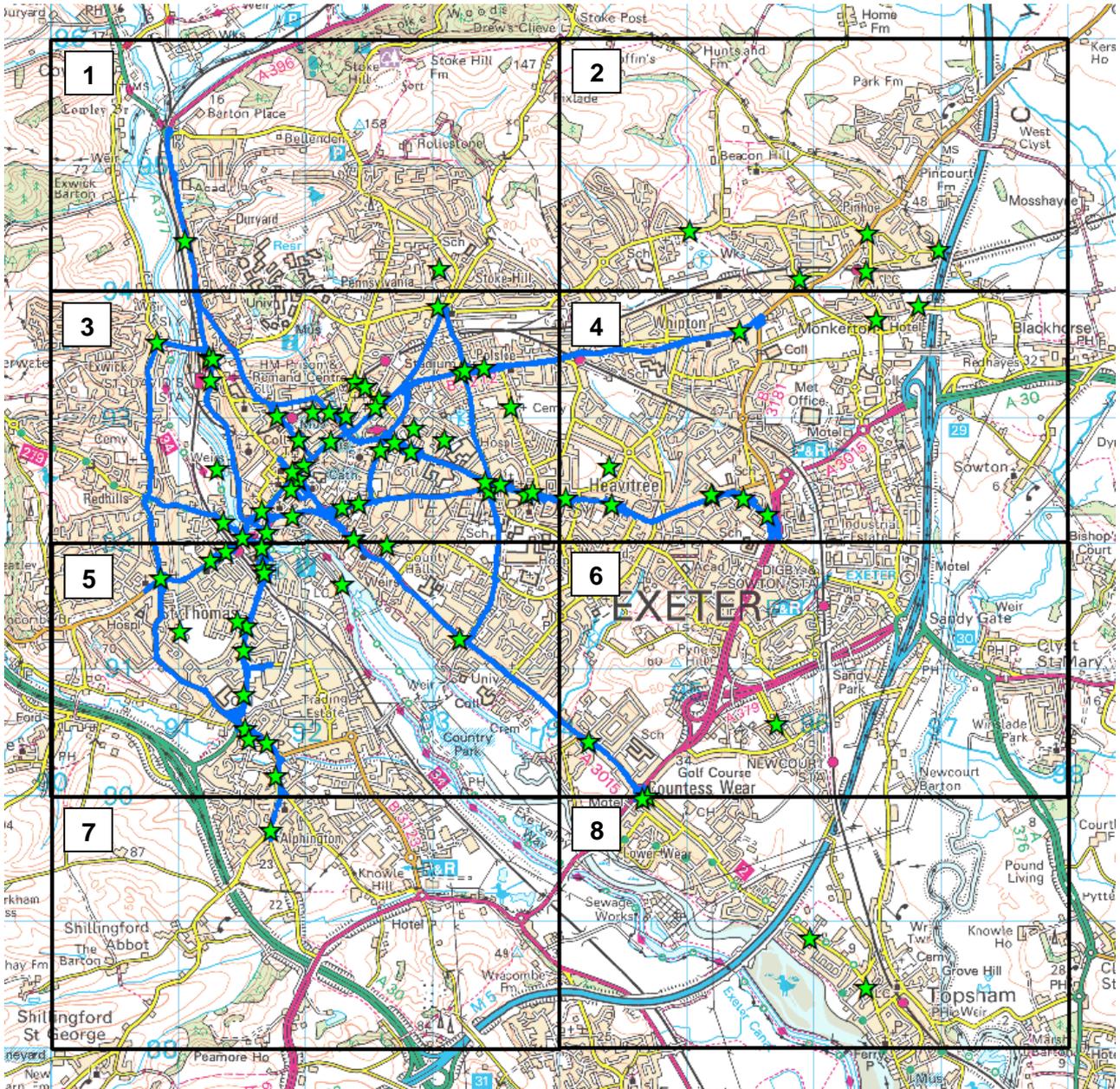
A single local bias adjustment factor has been used to bias adjust the 2020 diffusion tube results.

Appendix D: Map(s) of Monitoring Locations and AQMAs

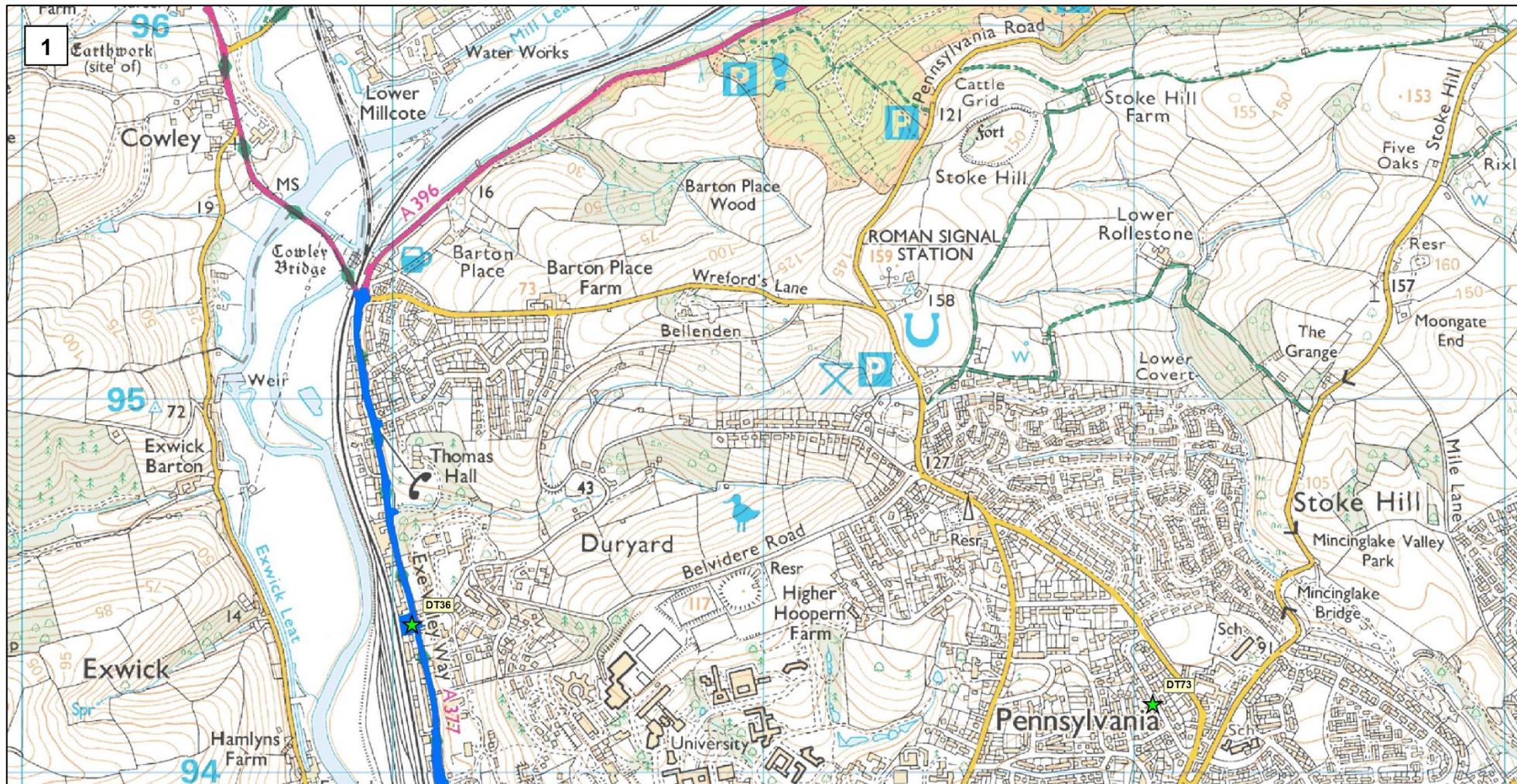
Figure D.1 – Map of Non-Automatic Monitoring Site

The monitoring locations and 2020 data can also be viewed using an online map [here](#).

Monitoring location = ★
AQMA =



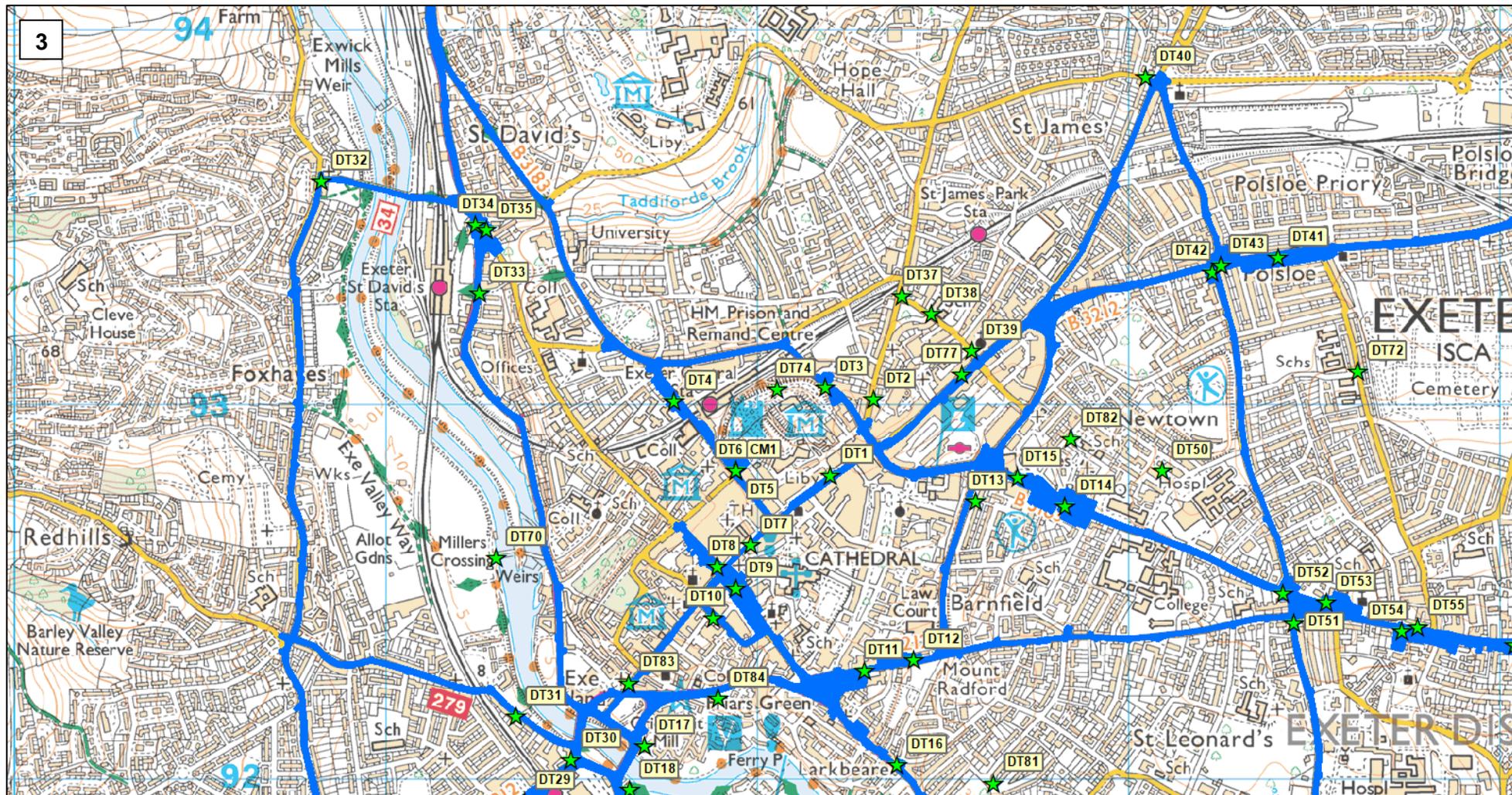
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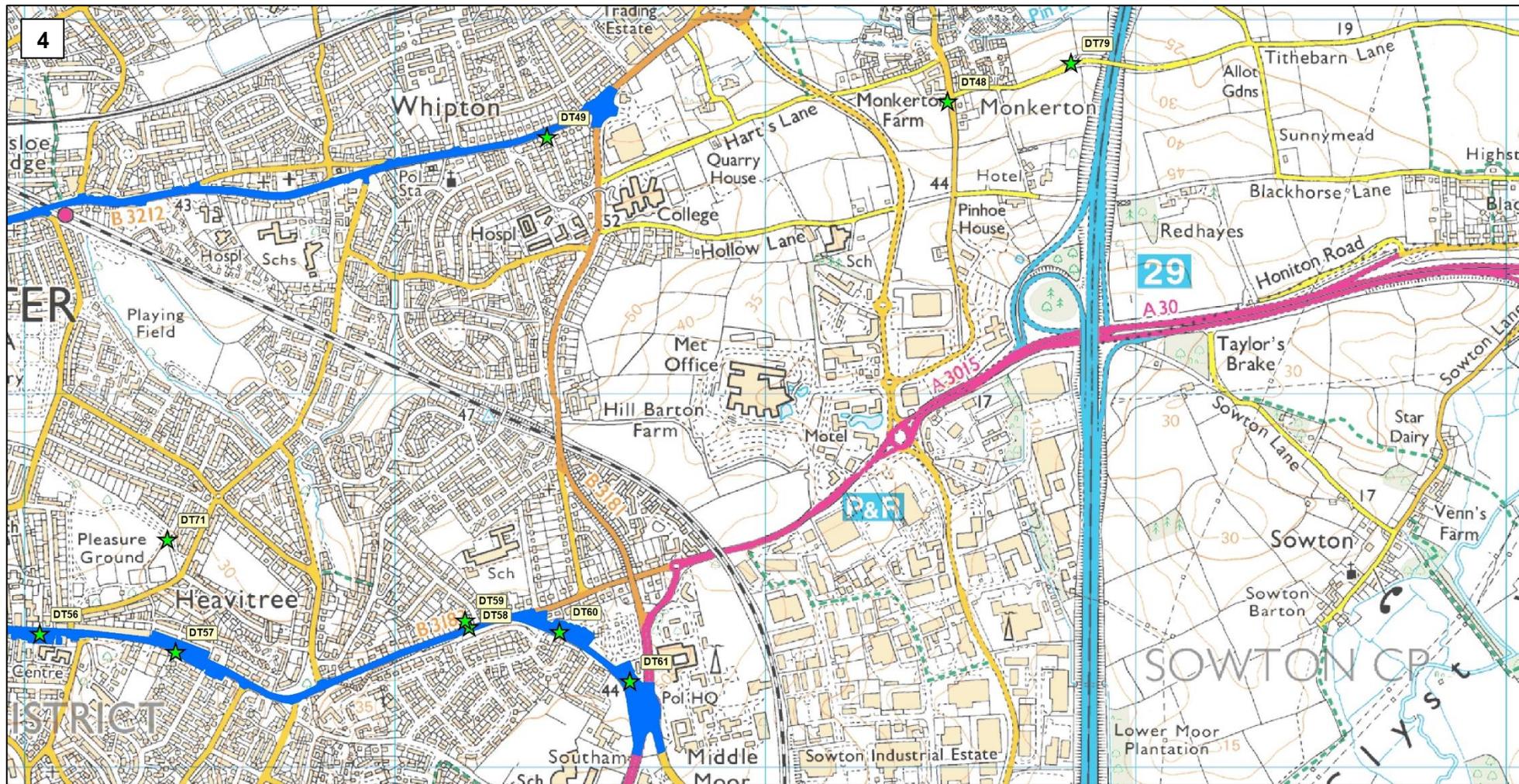
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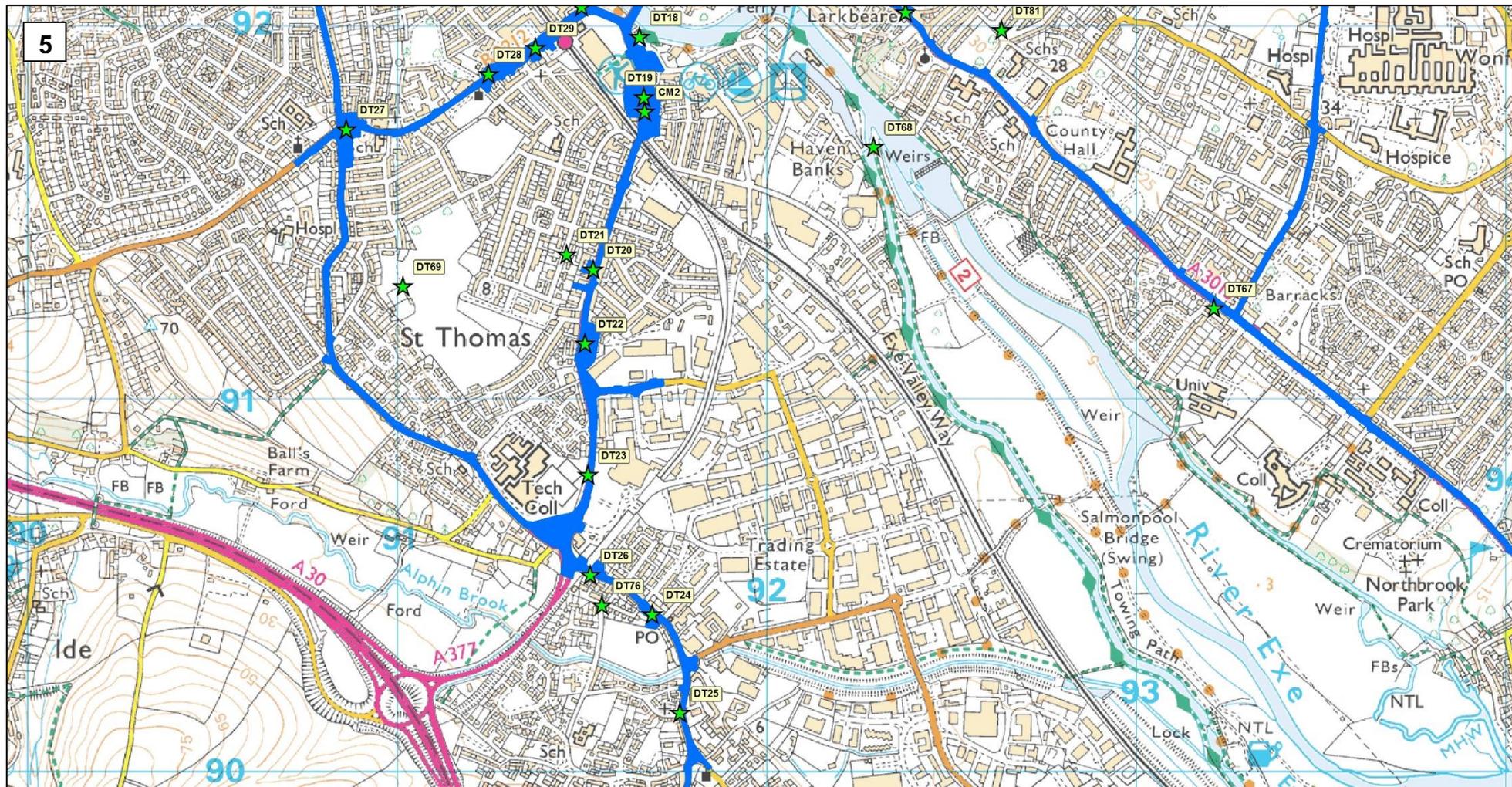
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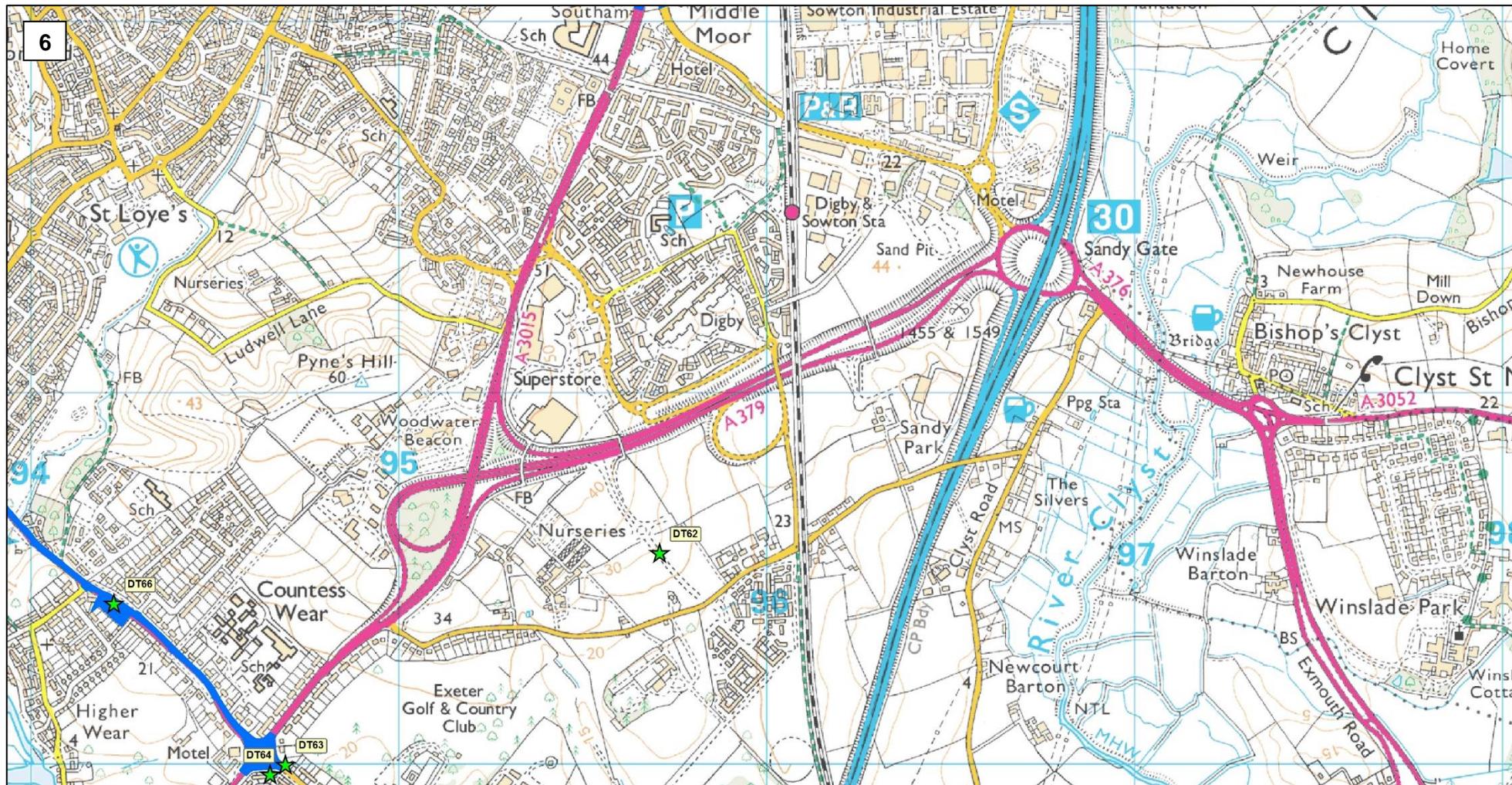
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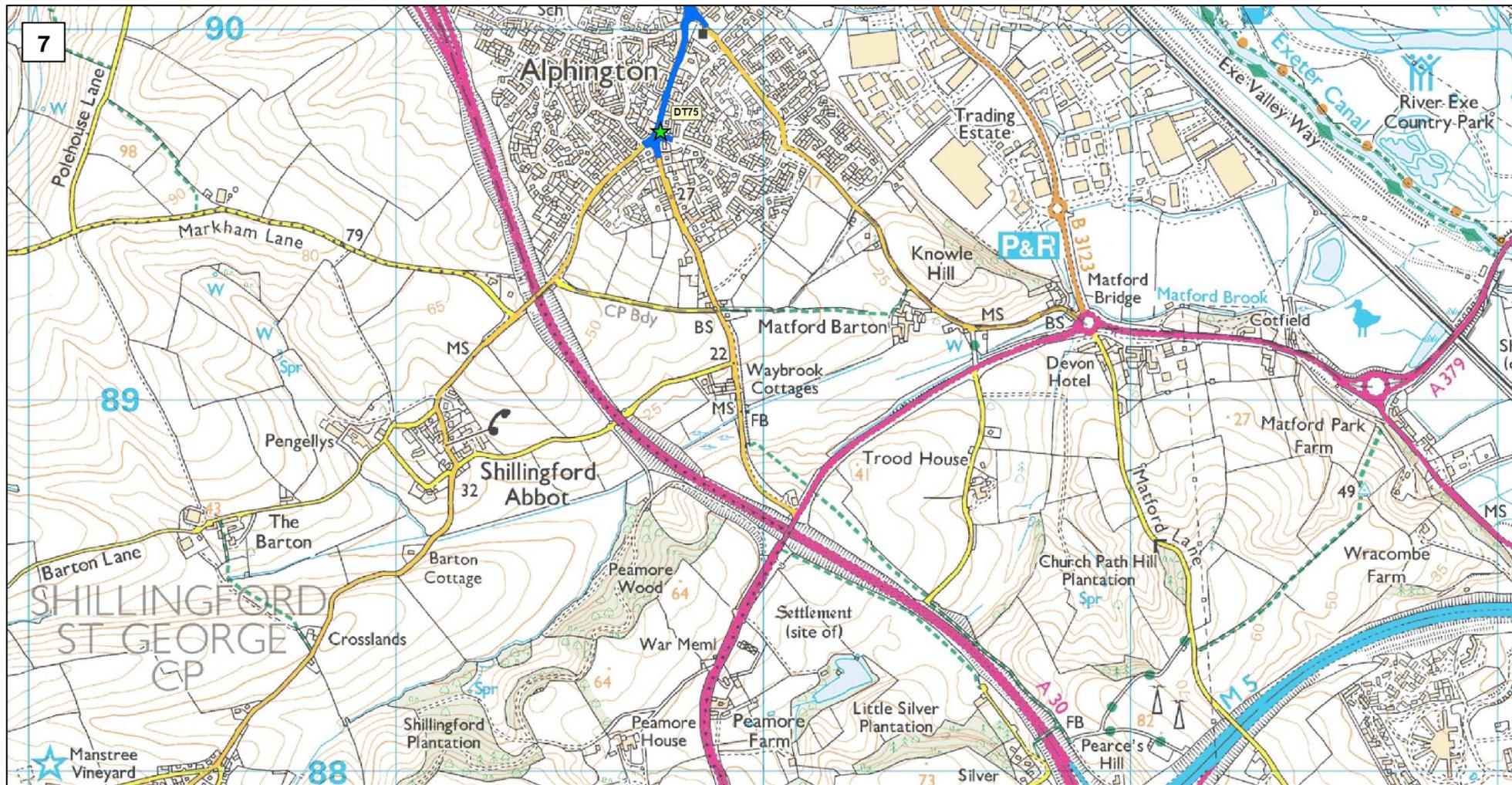
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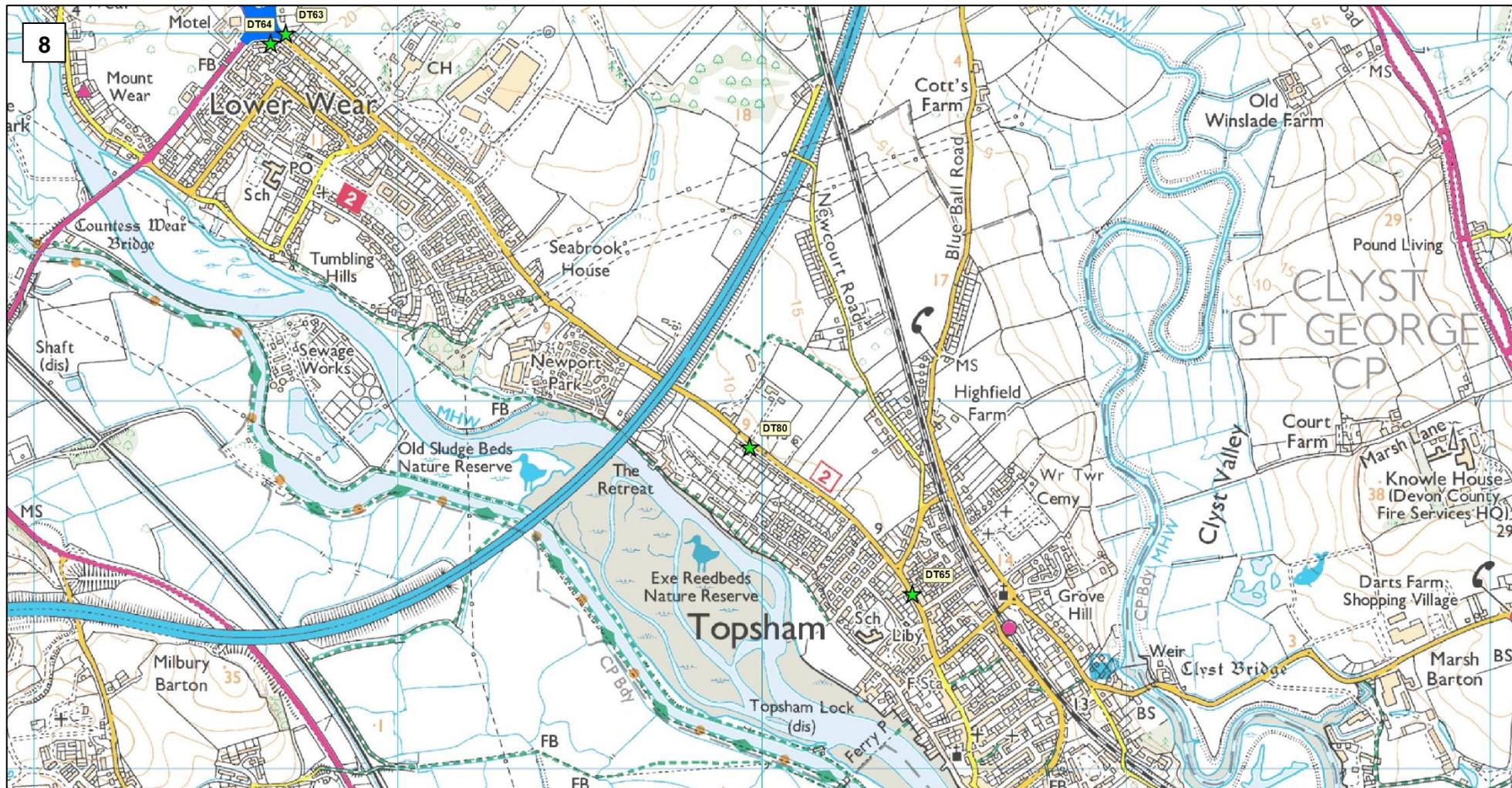
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Appendix E: Summary of Air Quality Objectives in England

Table E.1 – Air Quality Objectives in England¹

Pollutant	Air Quality Objective: Concentration	Air Quality Objective: Measured as
Nitrogen Dioxide (NO ₂)	200µg/m ³ not to be exceeded more than 18 times a year	1-hour mean
Nitrogen Dioxide (NO ₂)	40µg/m ³	Annual mean
Particulate Matter (PM ₁₀)	50µg/m ³ , not to be exceeded more than 35 times a year	24-hour mean
Particulate Matter (PM ₁₀)	40µg/m ³	Annual mean
Sulphur Dioxide (SO ₂)	350µg/m ³ , not to be exceeded more than 24 times a year	1-hour mean
Sulphur Dioxide (SO ₂)	125µg/m ³ , not to be exceeded more than 3 times a year	24-hour mean
Sulphur Dioxide (SO ₂)	266µg/m ³ , not to be exceeded more than 35 times a year	15-minute mean

¹ The units are in microgrammes of pollutant per cubic metre of air (µg/m³).

Appendix F: Impact of COVID-19 upon LAQM

COVID-19 has had a significant impact on society. Inevitably, COVID-19 has also had an impact on the environment, with implications to air quality at local, regional and national scales.

COVID-19 has presented various challenges for Local Authorities with respect to undertaking their statutory LAQM duties in the 2021 reporting year. Recognising this, Defra provided various advice updates throughout 2020 to English authorities, particularly concerning the potential disruption to air quality monitoring programmes, implementation of Air Quality Action Plans (AQAPs) and LAQM statutory reporting requirements. Defra has also issued supplementary guidance for LAQM reporting in 2021 to assist local authorities in preparing their 2021 ASR. Where applicable, this advice has been followed.

Despite the challenges that the pandemic has given rise to, the events of 2020 have also provided Local Authorities with an opportunity to quantify the air quality impacts associated with wide-scale and extreme intervention, most notably in relation to emissions of air pollutants arising from road traffic. The vast majority (>95%) of AQMAs declared within the UK are related to road traffic emissions, where attainment of the annual mean objective for nitrogen dioxide (NO₂) is considered unlikely. On 23rd March 2020, the UK Government released official guidance advising all members of public to stay at home, with work-related travel only permitted when absolutely necessary. During this initial national lockdown (and to a lesser extent other national and regional lockdowns that followed), marked reductions in vehicle traffic were observed; Department for Transport (DfT) data (reported by the Prime Minister's Office at the COVID-19 briefing on the 31st of May 2020) suggests reductions in vehicle traffic of up to 70% were experienced across the UK by mid-April, relative to pre COVID-19 levels.

This reduction in travel in turn gave rise to a change of air pollutant emissions associated with road traffic, i.e. nitrous oxides (NO_x), and exhaust and non-exhaust particulates (PM). The Air Quality Expert Group (AQEG) has estimated that during the initial lockdown period in 2020, within urbanised areas of the UK reductions in NO₂ annual mean concentrations were between 20 and 30% relative to pre-pandemic levels, which represents an absolute reduction of between 10 to 20µg/m³ if expressed relative to annual mean averages (Air Quality Expert Group, Estimation of changes in air pollution emissions, concentrations and exposure during the COVID-19 outbreak in the UK, June 2020). During this period, changes in PM_{2.5} concentrations were less marked than those of NO₂. PM_{2.5}

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concentrations are affected by both local sources and the transport of pollution from wider regions, often from well beyond the UK. Through analysis of AURN monitoring data for 2018-2020, AQEG have detailed that PM_{2.5} concentrations during the initial lockdown period are of the order 2 to 5µg/m³ lower relative to those that would be expected under business-as-usual conditions.

As restrictions are gradually lifted, the challenge is to understand how these air quality improvements can benefit the long-term health of the population.

Impacts of COVID-19 on Air Quality within Exeter

COVID-19 related impacts on monitored concentrations and traffic numbers within the AQMA and particularly along the Heavitree corridor (where the greatest exceedances were seen prior to 2020) are presented below.

Yearly traffic flows were around 15-25% down on previous years (table F.1), with the greatest reduction seen during the first lockdown in April 2020 (flows down 60%). Typical levels of traffic returned in August and September.

Annual average nitrogen dioxide concentrations fell by between 14 and 40% when compared to an average for the previous five years (2015 to 2019). The average change was a 31% reduction. This is greater than the fall in traffic flows (Table F.1), which suggests that the impact of reducing traffic flows is not just in the reduction in vehicles but also in the consequent impact on congestion. When there are fewer vehicles on the road, there is less congestion and emissions per vehicle are reduced as driving is smoother and speeds more constant.

Table F.1 Traffic flow data for 2015 and 2020

Site Name	AAWT (24hr)		% change
	2015	2020	
Pinhoe Road (Whipton)	20830	16538	-21%
Heavitree Road*	17507	14832	-15%
Honiton Road	26832	22789	-15%
Topsham Road (King George)	26057	20702	-21%
Alphington St	28799	22012	-24%
Cowick St	14840	10913	-26%
Total	134865	107786	-20%

*2016 count data instead because 2015 data was faulty

Exeter City Council

In 2020, no exceedences of the objective level were seen in Exeter for the first time. This has given both the City and County Council's useful evidence in relation to the annual mean objective being achievable, and the changes that are necessary to achieve this.

Opportunities Presented by COVID-19 upon LAQM within Exeter

COVID-19 has presented opportunities during 2020 which are described below:

- Temporary Cycle Lanes, School Streets and road closures. A number of temporary improvements were implemented by Devon County Council. Due to high usage and positive feedback many of these either have been or will be progressed to become permanent features.
- Engagement with support groups and individuals during 2020 has increased. This will support the community building work that is being led by the SELDP team.

Challenges and Constraints Imposed by COVID-19 upon LAQM within Exeter City Council

The following challenges and/or constraints have been experienced in relation to LAQM within 2020 that can be attributed to the pandemic. For each challenge and/or constraint an impact rating has been stated in line with guidance presented within the LAQM Impact Matrix provided within Table F.2.

- The implementation of measures around public and shared transport (such as Park and Change and Co-Cars) and travel planning visits to new homes have been delayed as a result of social distancing restrictions. These are all expected to recommence in 2021. **Small to Medium Impact**
- As with previous years, a local bias adjustment factor has been utilised to adjust the diffusion tube results for 2020. The factor is lower than in previous years, but data capture was good and the tubes showed good overall precision. There is no reason therefore to conclude that the local adjustment factor is any less reliable than normal. **No Impact**
- During 2020, the diffusion tube calendar had to be adjusted and repairs to the Alphington Street continuous analyser were delayed as a result of COVID-19.

Exeter City Council

However data capture in all cases remained above 75% and so no data required annualisation. QA/QC procedures were otherwise maintained and tubes continued to be stored correctly. **No Impact to Small Impact**

The impacts as presented above are aligned with the criteria as defined in Table F.2, with professional judgement considered as part of their application.

Table F.2 – Impact Matrix

Category	Impact Rating: None	Impact Rating: Small	Impact Rating: Medium	Impact Rating: Large
Automatic Monitoring – Data Capture (%)	More than 75% data capture	50 to 75% data capture	25 to 50% data capture	Less than 25% data capture
Automatic Monitoring – QA/QC Regime	Adherence to requirements as defined in LAQM.TG16	Routine calibrations taken place frequently but not to normal regime. Audits undertaken alongside service and maintenance programmes	Routine calibrations taken place infrequently and service and maintenance regimes adhered to. No audit achieved	Routine calibrations not undertaken within extended period (e.g. 3 to 4 months). Interruption to service and maintenance regime and no audit achieved
Passive Monitoring – Data Capture (%)	More than 75% data capture	50 to 75% data capture	25 to 50% data capture	Less than 25% data capture
Passive Monitoring – Bias Adjustment Factor	Bias adjustment undertaken as normal	<25% impact on normal number of available bias adjustment colocation studies (2020 vs 2019)	25-50% impact on normal number of available bias adjustment studies (2020 vs 2019)	>50% impact on normal number of available bias adjustment studies (2020 vs 2019) and/or applied bias adjustment factor studies not considered representative of local regime
Passive Monitoring – Adherence to Changeover Dates	Defra diffusion tube exposure calendar adhered to	Tubes left out for two exposure periods	Tubes left out for three exposure periods	Tubes left out for more than three exposure periods
Passive Monitoring – Storage of Tubes	Tubes stored in accordance with laboratory guidance and analysed promptly.	Tubes stored for longer than normal but adhering to laboratory guidance	Tubes unable to be stored according to be laboratory guidance but analysed prior to expiry date	Tubes stored for so long that they were unable to be analysed prior to expiry date. Data unable to be used
AQAP – Measure Implementation	Unaffected	Short delay (<6 months) in development of a new AQAP, but is on-going	Long delay (>6 months) in development of a new AQAP, but is on-going	No progression in development of a new AQAP
AQAP – New AQAP Development	Unaffected	Short delay (<6 months) in development of a new AQAP, but is on-going	Long delay (>6 months) in development of a new AQAP, but is on-going	No progression in development of a new AQAP

Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
ASR	Annual Status Report
Defra	Department for Environment, Food and Rural Affairs
DMRB	Design Manual for Roads and Bridges – Air quality screening tool produced by Highways England
EU	European Union
FDMS	Filter Dynamics Measurement System
LAQM	Local Air Quality Management
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
PM ₁₀	Airborne particulate matter with an aerodynamic diameter of 10µm or less
PM _{2.5}	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
QA/QC	Quality Assurance and Quality Control
SO ₂	Sulphur Dioxide
O ₃	Ozone
DCC	Devon County Council
ECC	Exeter City Council
GESP	Greater Exeter Strategic Plan
ECF	Exeter City Futures
SELDP	Sport England Local Delivery Pilot

References

- Local Air Quality Management Technical Guidance LAQM.TG16. April 2021. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.
- Local Air Quality Management Policy Guidance LAQM.PG16. May 2016. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.
- Exeter City Council 2019. Exeter Air Quality Action Plan 2019-2023.
- Exeter City Council 2019. Exeter Air Quality Annual Status Report.
- Diffusion Tubes for Ambient NO₂ Monitoring: Practical Guidance for Laboratories and Users 2008
- National bias adjustment factor spreadsheet.
- Devon Local Transport Plans.

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REPORT TO EXECUTIVE

Date of Meeting: 7 September 2021

Report of: Director – Net Zero and City Management

Title: Review of the Council's Contaminated Land Strategy

Is this a Key Decision?

No

Is this an Executive or Council Function?

Executive

1. What is the report about?

- 1.1 To update Members on the review of the Council's Contaminated Land Strategy, and forthcoming consultation.

2. Recommendations:

2.1 That Executive:

- 1) note the draft revised Contaminated Land Strategy; and
- 2) Approve the consultation on the draft strategy commencing on 08 September 2021 until 03 November 2021.

3. Reasons for the recommendation:

3.1 The City Council first published a Contaminated Land Strategy in 2001. Since then, there have been significant changes to the legislation and statutory guidance, which resulted in the strategy being updated in 2014. It has now been reviewed again. The Council is therefore undertaking consultation on the draft of the latest strategy, which will cover the period 2022 to 2027. The consultation will involve contact with the relevant statutory consultees: the Environment Agency, Devon County Council, neighbouring authorities, Natural England and Public Health England as well as the public via the Council's website.

4. What are the resource implications including non financial resources?

The revised Contaminated Land Strategy will be implemented within existing resources. The Strategy explains how the Council, in its approach land contamination will seek to minimise unnecessary burdens on the taxpayer, businesses and individuals, where it is reasonable and practicable to do so.

5. Section 151 Officer comments:

There are no financial implications for Council to consider.

6. What are the legal aspects?

6.1 Section 57 of the Environment Act 1995 created Part 2A of the Environmental Protection Act 1990 (“Part 2A”) which establishes a legal framework for dealing with contaminated land in England. Part 2A requires that local authorities cause their areas to be inspected with a view to identifying contaminated land, and to do this in accordance with published Statutory Guidance.

6.2 For the purposes of the legislation, “contaminated land” has a strict definition:

‘any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land that –

- (a) significant harm is being caused or there is a significant possibility of such harm being caused; or
- (b) significant pollution of controlled waters is being caused, or there is a significant possibility of such pollution being caused.

This should be distinguished from the much broader category of “land affected by contamination” where contaminants are present but usually not at a sufficient level of risk to be contaminated land.

6.3 The Statutory Guidance was updated in 2012. It requires that local authorities should take a strategic approach to carrying out their inspection duties. This approach should be rational, ordered and efficient, and it should reflect local circumstances. The local authority should set out its approach as a written strategy, which it should formally adopt and publish to a timescale to be set by the authority.

6.3 The local authority should keep its written strategy under periodic review to ensure it remains up to date. It is for the authority to decide when its strategy should be reviewed. There have been no changes to the legislation or statutory guidance since the 2014 Strategy was adopted.

7. Monitoring Officer’s comments:

The Council is obliged to have a strategy for dealing with contaminated land. This report deals with the review of that strategy and as such raises no issues of concern for the Monitoring Officer.

8. Report details:

8.1 In the reviewed strategy which covers the period from 2022 to 2027, the Council sets out:

- Its aims, objectives and priorities, taking into account the characteristics of its area;
- The relevant aspects of the Exeter area;
- Its approach to strategic inspection, the prioritisation of detailed inspection and remediation activity;
- How Part 2A fits with its broader approach to dealing with land contamination, using other legislation, voluntary remediation or as part of wider regeneration work; and

- How in its approach to Part 2A and land contamination, the Council will seek to minimise unnecessary burdens on the taxpayer, businesses and individuals, where it is reasonable and practicable to do so.

8.2 There has been no change to the legislation or statutory guidance since the 2014 Strategy was adopted. The 2020 Strategy is therefore little changed from the previous version, except to update the local development context and statistics.

8.3 The Council is undertaking consultation on the draft strategy, specifically involving the Environment Agency, Devon County Council, neighbouring authorities, Natural England and Public Health England. Consultation will last 8 weeks. The draft Strategy is included as Appendix 1.

8.4 The strategy will be amended following consultation (if required), and the final Contaminated Land Strategy will be presented to Executive on 30 November 2021 and Full Council on 14 December.

9. How does the decision contribute to the Council's Corporate Plan?

- 9.1 The main contribution of effective management of contaminated land is to support the key priorities of 'building great neighbourhoods and promoting active and healthy lifestyles.'

10. What risks are there and how can they be reduced?

10.1 Risks associated with the failure to manage contaminated land include risks to the population of Exeter, those working in the city, and risks to the environment. There is also a reputational risk to the Council if it fails to act in a reasonable manner. Failure to make a reasoned judgement on contaminated land could result in legal action or insurance claims, particularly in the case of land owned by the Council, or risk assessment decisions made by Council officers.

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and

new and breastfeeding mothers, marriage and civil partnership status in coming to a decision.

11.4 In recommending this proposal potential impact has been identified on people with protected characteristics as determined by the Act and an Equalities Impact Assessment has been included in the background papers for Member's attention.

12. Carbon Footprint (Environmental) Implications:

12.1 There are no direct carbon/environmental impacts arising from the recommendations.

13. Are there any other options?

13.1 Adoption of a Contaminated Land Strategy is a legal duty.

Director Net Zero and City Management, David Bartram

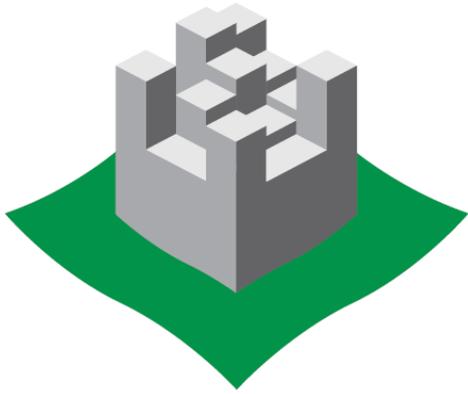
Author: Simon Lane, Service Lead – Environmental Health and Community Safety
Alex Bulleid, Senior Environmental Technical Officer

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

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Exeter
City Council

Environmental Health and Community Safety

Contaminated Land Strategy

2022 – 2027

DRAFT

Introduction

Section 57 of the Environment Act 1995 created Part 2A of the Environmental Protection Act 1990 ("Part 2A") which establishes a legal framework for dealing with contaminated land in England. Part 2A defines "contaminated land" as follows:

"contaminated land" is any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land that –

- (a) significant harm is being caused or there is a significant possibility of such harm being caused; or
- (b) significant pollution of controlled waters is being caused, or there is a significant possibility of such pollution being caused. (Section 78A(2))

"Harm" means harm to the health of living organisms or other interference with the ecological systems of which they form part and, in the case of man, includes harm to his property. (Section 78A(4))

Under Part 2A the Secretary of State issues Statutory Guidance on how local authorities should determine which land is contaminated land and which is not. Land which has been determined can be further designated as a Special Site, from which point regulation becomes the responsibility of the Environment Agency. (A Special Site is defined in The Contaminated Land (England) Regulations 2006 as one which is affecting controlled waters in certain specific circumstances, or where a particular range of activities have caused the contamination).

The Statutory Guidance also provides further information on the duty of local authorities to inspect their areas with a view to identifying contaminated land. It describes two broad types of "inspection":

(a) strategic inspection, for example collecting information to make a broad assessment of land within an authority's area and then identifying priority land for more detailed consideration; and

(b) carrying out the detailed inspection of particular land to obtain information on ground conditions and carrying out the risk assessments which support decisions under the Part 2A regime relevant to that land.

Exeter City Council (the Council) first published a Contaminated Land Strategy in 2001. This document has been revised and updated twice since then to reflect the current guidance and context. In it, the Council sets out:

- Its aims, objectives and priorities, taking into account the characteristics of its area;
- The relevant aspects of the Exeter area;
- Its approach to strategic inspection, the prioritisation of detailed inspection and remediation activity;

- How Part 2A fits with its broader approach to dealing with land contamination, using other legislation, voluntary remediation or as part of wider regeneration work; and
- How in its approach to Part 2A and land contamination, the Council will seek to minimise unnecessary burdens on the taxpayer, businesses and individuals, where it is reasonable and practicable to do so.

In producing a final version of this strategy, the Council will consult with the following bodies:

- Environment Agency;
- Teignbridge District Council;
- East Devon District Council;
- Mid Devon District Council;
- Natural England;
- Devon County Council; and
- Public Health England.

The strategy will be reviewed again following any significant changes to legislation or guidance, or five years after adoption, whichever is the sooner.

Terminology

Some general aspects of terminology used in this Strategy are:

“contaminated land” is used to mean land which meets the Part 2A definition of contaminated land. Other terms, such as “land affected by contamination” or “land contamination”, are used to describe the much broader categories of land where contaminants are present but usually not at a sufficient level of risk to be contaminated land.

“Part 2A” means Part 2A of the Environmental Protection Act 1990 (as amended).

The terms **“contaminant”**, **“pollutant”** and **“substance”** as used in this Strategy have the same meaning – i.e. they all mean a substance relevant to the Part 2A regime which is in, on or under the land and which has the potential to cause significant harm to a relevant receptor, or to cause significant pollution of controlled waters.

“unacceptable risk” means a risk of such a nature that it would give grounds for land to be considered contaminated land under Part 2A.

“the Council” means Exeter City Council.

“leaching” is the process by which contaminants are released from the soil into groundwater or water in soil pores. How much contamination is released will depend on a variety of factors such as soil type, type of contaminant, soil conditions etc.

“source” is used to mean land contamination that may be present on or under a site.

“pathway” is used to describe how contamination may reach a receptor from the source area, for example by ingestion of contaminated soil, or by leaching of contamination from the soil into groundwater.

A **“receptor”** is someone or something that may be adversely affected by contamination, for example site occupants, organisms living in a stream, historic monuments etc.

Exeter City Council's Aims, Objectives and Priorities

- **To identify and remove unacceptable risks to human health and the environment**

The Council's starting point will be that land is not contaminated land unless there is reason to consider otherwise. Only land where unacceptable risks are clearly identified, after a risk assessment has been undertaken in accordance with the Statutory Guidance, will be considered as meeting the Part 2A definition of contaminated land.

The Council may need to decide whether and how to act in situations where such decisions are not straightforward, and where there may be unavoidable uncertainty underlying some of the facts of each case. In so doing, the Council will use its judgement to strike a reasonable balance between:

- (a) dealing with risks raised by contaminants in land and the benefits of remediating land to remove or reduce those risks; and
- (b) the potential impacts of regulatory intervention including financial costs to whoever will pay for remediation (including the taxpayer where relevant), health and environmental impacts of taking action, property blight, and burdens on affected people.

- **To seek to ensure that contaminated land is made suitable for its current use**

The Council will take a precautionary approach to the risks raised by contamination, whilst avoiding a disproportionate approach given the circumstances of each case. The aim will be to consider the various benefits and costs of taking action, with a view to ensuring that the intervention produces net benefits, taking account of local circumstances in each case.

- **To ensure that the burdens faced by individuals, companies and society as a whole are proportionate, manageable and compatible with the principles of sustainable development**

The Council will take a strategic approach to carrying out its inspection duty. This approach will be rational, ordered and efficient, and it will reflect local circumstances in Exeter. It is set out in this Strategy, which has been formally adopted and published. The Strategy will be kept under periodic review to ensure it remains up to date, especially in the event of changes to the Statutory Guidance. The Council will aim to review the Strategy at least every five years.

The Council will seek to minimise unnecessary burdens on the taxpayer, businesses and individuals; for example by encouraging voluntary action to deal with land contamination issues as far as it considers reasonable and practicable. This will involve taking a broader approach to dealing with land contamination including through the planning system. The Council will seek to use Part 2A only where no appropriate alternative solution exists.

A Description of Relevant Aspects of Exeter City Council's Area

Exeter is a compact city of 4774 hectares largely constrained by hills. The topography of the city and surrounding countryside form three distinct zones. There are ridges of high ground in the north with steep-sided river valleys, then a central zone of gentle south and east-facing slopes and thirdly the flood plain of the River Exe which forms a level tract across the district from the west, towards the estuary in the south east. Specific characteristics of the city will be discussed below under the headings of Sources, Pathways and Receptors.

Contamination Sources

The first recognised settlement at Exeter was a fortress housing the 2nd Augusta Legion constructed in c. 50 A.D. on a spur overlooking the river. From that start, Exeter has grown into the regional capital, expanding to include surrounding villages and farmsteads.

At first, industrial activity consisted mainly of small-scale cottage or “back yard” establishments serving local needs but the growth of the Devon woollen industry meant that by the 17th and 18th centuries Exeter's commerce and industry was of national prominence. The city's early industrial heritage from this time includes the quay area, mills and Exeter Ship Canal.

Into the 19th century, Exeter maintained an industrial base fit to serve its population and its large, mainly agricultural, hinterland. Development focussed around the expansion of the canal and the coming of the railways with the growth of industrial areas to the west of the river, near the canal basin and railway. However Exeter did not develop into a significant industrial base during the Industrial Revolution

During the Second World War around 38 acres of developed land was damaged by bombs. After the war, planned major reconstruction included the relocation of employment uses to the Marsh Barton, Sowton and Pinhoe industrial estates on the periphery of the City and the construction of the Western Way inner bypass. Subsequent development has been focussed on commercial investment with the construction of shopping centres, offices and warehouse buildings rather than large-scale industry.

Construction materials have been extracted and produced in Exeter throughout its history, including quarrying of volcanic stone at Rougemont and red breccia from eastern Heavitree. Local clays and brickearth have been quarried for brick and tile production, pottery and to make clay moulds and vessels for use in local industrial processes. With the building boom of the 18th and 19th Centuries, large clay pits and brickworks opened to the east of the City. Many of these former pits were subsequently filled, either with brickworks waste or refuse.

Small and medium scale industry has therefore been present since the Roman period. Known former land uses that have the potential to cause contamination include; gasworks, slaughterhouses, brickworks, foundries, railway land, landfill

sites, tanneries, Ministry of Defence land, sewage treatment plants, petrol filling stations and timber treatment yards.

'Background' and 'Normal' Levels of Contamination

Natural geology and common, widespread human activities have resulted in levels of contamination which can be considered as 'normal' or 'background' for a certain area. The British Geological Survey's project on Normal Background Concentrations of Contaminants includes central Exeter within the urban domains for background levels of Benzo a Pyrene, Mercury, Cadmium, Copper and Lead. Areas of mineralisation domains are located within the city boundary for nickel, copper and arsenic.

Pathways

Contamination pathways, or routes by which contamination can move in the subsurface are affected by the underlying soils, geology and hydro-geology. In Exeter, the oldest solid formations are located in the north, with younger units overlying towards the south and east. Figure 1 summarises the main units.

The oldest rocks are Late Carboniferous folded shales and subordinate thin beds of hard sandstone which form part of the Culm Measures and are known locally as the Crackington Formation. Overlying these in the central and southern parts of the City area are Late Permian New Red Sandstones. The lowest beds are the fine clayey sands of the Whipton Formation which are succeeded by the Alphington and Heavitree breccias. These breccias consist of gravel fragments of a variety of rock types including sandstone, slate, vein quartz and igneous debris in a matrix of red, silty or clayey sand. A small area of Dawlish Sandstone is included within the east of the city.

In three places along the boundary between the Crackington Formation and Whipton Formation are small outcrops of volcanic lava known as "Exeter Traps" or in more recent terminology as the Exeter Volcanic Rocks. One such outcrop forms the high ground on which Rougemont Castle stands.

Groundwater flow within the Crackington Formation and the Breccias is mainly fissure and fracture-borne. The Dawlish Sandstone flow mechanisms are intergranular and fracture flow and they tend to be highly permeable.

Soils developed on the Crackington Formation are mostly of clay with a variable proportion of fragments of hard sandstone. In many places the bedrock is covered by up to 2m or more of Head, which is weathered rock debris, including clay, silt sand and fragments of shale and sandstone. Soils over the New Red Sandstone units are mostly sandy or gravel rich loams and commonly red-brown in colour. Again, up to 2m or more of Head can cover the bedrock. The modern channel of the River Exe is surrounded by deposits of alluvium, commonly silt, clay and sand with some peat in places, and resting on coarse gravel. Eight elevated gravel river terrace deposits have been identified.

The risks of pollution from a given activity vary from place to place as they depend on the physical, chemical and biological properties of the underlying soil and rocks. These make the groundwater in different areas more or less vulnerable to pollution. The Environment Agency has produced 'Groundwater Vulnerability' maps. Groundwater vulnerability depends on factors such as: infiltration through the soil zone, soil leaching class, drift cover and unsaturated zone thickness. The Groundwater Vulnerability maps classify the majority of the geological formations underlying Exeter as being of high vulnerability.

The Dawlish Sandstone is the only 'Principal Aquifer' underlying Exeter. It is mainly overlain by well drained sandy and coarse loamy soils. These afford little protection to the sandstone aquifer, and thus contribute to its 'high' vulnerability class.

Receptors

The urban area of Exeter originally consisted of the land within the old city walls, where most properties represented both trade and residential uses. From the 19th Century the city began to develop residential quarters, for example, at Newtown, Mount Pleasant, St Thomas and lower Pennsylvania. This accelerated in the twentieth Century, particularly between the wars, with demand growing for improved housing with larger gardens along the radial routes into the City. At this time many of the City's slum dwellers were rehoused in newly built council housing estates on the edge of the city at Stoke Hill, Countess Wear, Whipton Barton and Redhills. However, in the 1990s and 2000s greater emphasis was placed upon reusing 'brownfield land' rather than new Greenfield development. This returned residential receptors to areas of close proximity to potential contamination sources.

Approximately 1735 hectares of land, 36.8% of the City's area, is designated as 'Green Areas.' This includes designated Valley Parks, with open public access, which make up 4% of the city area, approximately 40 hectares of allotment sites, and over 100 hectares of parks and play areas.

Exeter contains a rich variety of wildlife habitats. This is due to a combination of geology/topography and geography. The Exe Estuary is designated as an internationally important wetland area under the RAMSAR Convention on Wetlands and also as a Special Protection Area under the E.C. Birds Directive. There are three SSSIs in Exeter, the Exe Estuary, Stoke Woods and Bonhay Road and a proliferation of SNCS which have nature conservation value at a regional/county and City level and SLINCS which are important at the City level.

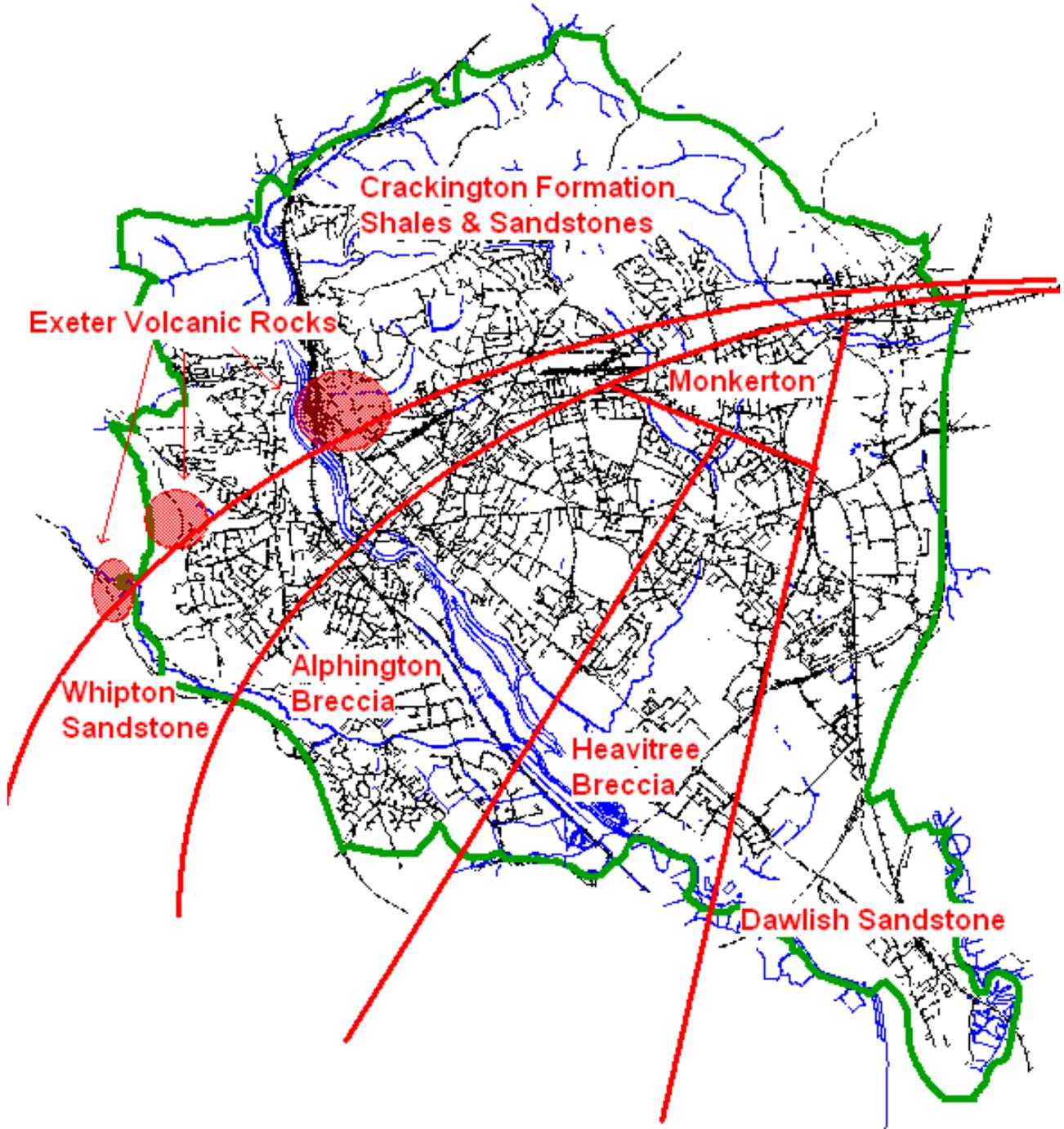
Exeter contains 20 Scheduled Monuments (SMs) designated under the Ancient Monuments and Archaeological Areas Act 1979 and the central area of the City is designated as an Area of Archaeological Importance (AAI).

The Environment Agency's aquifer designation of the rocks beneath the city is shown in Table 1.

The water supply for the City is taken from the River Exe but this is at a point outside the Council boundary, and there is no public groundwater extraction for

drinking water supplies. There are two private water supplies in the City used for drinking water. These are both for commercial premises and are regulated and maintained in accordance with the Private Water Supply Regulations 2009.

Figure 1 Exeter's Solid Geology



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Table 1 Aquifer Designation

Unit	Classification	Description
Culm Measures (Crackington Formation)	Secondary A bedrock aquifer	Permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers.
Lower Permian Basal Breccias, Conglomerates and Sandstones	Secondary A bedrock aquifer and named in Schedule 2, Regulation 3(c) of the Contaminated Land Regulations 2000.	Permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. And Sites underlain by these strata may, depending on the nature of the contamination present, be classified as Special Sites.
	Lower Permian Basal Breccias, Conglomerates and Sandstones (Dawlish Sandstone), Principal Bedrock Aquifer and named in Schedule 2, Regulation 3(c) of the Contaminated Land Regulations 2000.	These are layers of rock deposits that have high intergranular and/or fracture permeability, meaning they usually provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. And, sites underlain by these strata may, depending on the nature of the contamination present, be classified as Special Sites.
Alluvium and head deposits	Secondary A superficial aquifer	Permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers.
Estuary tidal flats	Undifferentiated secondary superficial aquifer	This classification is assigned in cases where it has not been possible to attribute either category A or B to a rock type.

Land ownership

The Council owns between 15 and 20% of the land area of the City. Most of the valley parks and playing fields are in Council ownership, including some that were formerly landfill sites. The majority of these are now managed operated on a day to day basis by Devon Wildlife Trust. The Council also holds the freeholds for much of the city centre which was damaged as a result of the blitz and significant parts of the Marsh Barton and Exhibition Way Trading Estates. This means that the Council is the owner of some of the potentially contaminated sites in the city. The Council has also retained its own housing stock and so is a significant land owner in some residential areas of the city.

Devon County Council owns a number of educational sites in the city and the University of Exeter and Royal Devon and Exeter Healthcare Trust are also significant land owners.

Future Developments, Planning Context and Sustainable Development

Exeter is currently growing rapidly, with significant urban extensions being built to the east and south-east of the city, including formal and informal public open space, play areas, allotments and schools as well as some commercial development. Most of this growth is on greenfield land, with only agricultural former uses (although these can represent potential contamination sources). Additional windfall sites which come forward are more likely to be on previously developed land.

In 2019 the Council published a vision document called Liveable Exeter. This outlines the potential for delivering a transformational housing programme of circa 12,000 homes in Exeter from 2020 to 2040. This development is all on previously developed land, where some level of contamination is to be expected. For the Greater Exeter area, there is a target of 53,200 new homes over the same period (this includes the 12,000 in Exeter).

Development Management decisions on all sites (including issues related to land contamination) will be made in accordance with the principles of sustainable development, the adopted Core Strategy, the National Planning Policy Framework and any Master Plan for the area. These will, as a minimum, ensure that developed land cannot be determined as contaminated land under Part 2A.

The Local Development Framework is not currently expected to include any specific planning documents relating to contaminated land. Instead, the Core Strategy DPD which was adopted in 2012 contains policies which aim to:

- Provide everyone in the community with the opportunity of living in a decent warm home of a suitable type, size and tenure for their needs, supported by the local community facilities they require, by making full and efficient use of previously developed land and delivering sustainable urban extensions to the east and southwest in co-operation with adjoining authorities.
- Promote development that contributes to a healthy population - by implementing the Green Infrastructure Strategy and ensuring that environmental quality and air quality is protected and enhanced.

Health and Economic Status

Exeter is a relatively prosperous and economically attractive city. The economy supports around 86,000 jobs and 4,500 businesses and has out-performed much of the rest of the south-west region in recent years. There are however pockets of deprivation, with small parts of the city being in the 10% most deprived areas of the country. Overall Exeter is also a healthy city, but people living in its more disadvantaged areas have comparatively poor health, as indicated by incidence of chronic illness and lower life expectancy. No specific health impacts associated with land quality have been identified.

Strategic Inspection

Strategic inspection involves collecting information to make a broad assessment of land within an authority's area and then identifying priority land for more detailed consideration. The Council will prioritise land which it considers most likely to pose the greatest risk to human health or the environment, recognising that all soils contain substances which could be harmful to such receptors, but in the very large majority of cases the level of risk is likely to be very low. For this purpose, "risk" will be taken to mean the combination of:

- (a) the likelihood that harm, or pollution of water, will occur as a result of contaminants in, on or under the land; and
- (b) the scale and seriousness of such harm or pollution if it did occur.

If the Council identifies land where it considers there is a reasonable possibility of unacceptable risk it will undertake detailed inspection of the land to obtain sufficient information to decide whether it is contaminated land, subject to the Council's prioritisation of sites for detailed inspection.

If at any stage the Council considers, on the basis of information obtained from inspection activities, that there is no longer a reasonable possibility that a significant contaminant linkage exists on the land, it will not carry out any further inspection in relation to that linkage. In some cases the process of strategic inspection, including prioritisation of detailed inspection activities, may give rise to property blight issues. The Council will seek to minimise or reduce such potential blight as far as it considers reasonable. Notwithstanding the above, strategic inspection of sites will be reviewed where appropriate in the event of significant changes to legislation or guidance, or relevant new information becoming available.

When undertaking strategic inspection, the Council will consider potential sources, pathways and receptors in a rational, ordered and efficient manner. A repeatable, transparent, and risk-based methodology will be used, based upon any identified pollution linkages and having regard to good practice guidance. Strategic Inspection will form part of a robust decision-making process which complies with Part 2A and the Statutory Guidance. IT and GIS systems will be used to undertake and document the process.

However the Council will not investigate potentially contaminated land solely using Part 11A. It is envisaged that the planning and building control systems will be used in the majority of occasions to ensure land is made suitable for use when it is redeveloped, and/or to encourage land owners to deal with problematic land as part of wider regeneration work. This broader approach may include encouraging polluters/owners of land affected by contamination to deal with problems without the need for Part 2A to be used directly. Other approaches used may also include the regimes for waste, water, and environmental permitting; and the Environmental Damage (Prevention and Remediation) Regulations 2009.

Progress with Strategic Inspection since Publication of the 2001 Strategy

Since 2001, the Council has identified over 1300 sites where there may be contamination sources, with initial information on potential pathways and receptors for all of these. The Council has detailed information on potential pollutant linkages for some of these sites, either where strategic inspection has progressed as a result of sites being higher up the prioritisation list, or where information has come forward as part of the planning process.

Strategic Inspection 2022 - 2027

There is a continued need to seek further information on potential pollutant linkages, in order to refine the prioritisation of sites for detailed inspection, until the point where it becomes clear that land is not contaminated. The Council will progress this work, in accordance with the principles outlined above, during the next five years.

Detailed Inspection and Remediation Activity

The Council will undertake detailed inspection of land to obtain information on ground conditions and to carry out risk assessments to support decisions under the Part 2A regime. As with strategic inspection, the Council will focus on land which might pose an unacceptable risk and consider risk as the combination of:

- (a) the likelihood that harm, or pollution of water, will occur as a result of contaminants in, on or under the land; and
- (b) the scale and seriousness of such harm or pollution if it did occur.

The Council will use risk assessment to make robust decisions, having regard to good practice guidance and based on information which is:

- (a) scientifically-based;
- (b) authoritative;
- (c) relevant to the assessment of risks arising from the presence of contaminants in soil; and
- (d) appropriate to inform regulatory decisions in accordance with Part 2A, the Statutory Guidance and local circumstances.

The timing of detailed inspection will be subject to the Council's prioritisation following strategic inspection. If at any stage the Council considers, on the basis of information obtained from inspections, that there is no longer a reasonable possibility that a significant contaminant linkage exists on the land, it will not carry out any further inspection in relation to that linkage.

Where the Council carries out any intrusive investigation, it will do so in accordance with appropriate good practice technical procedures for such investigations.

When deciding whether a site meets the definition of Contaminated Land, the Council will also have regard to the financial costs to whoever will pay for remediation (including the taxpayer where relevant), health and environmental impacts of taking action, property blight, and burdens on affected people. All decisions made will be rational, ordered, efficient and fully documented.

Liaison with Landowners and Powers of Entry

The Council will consult the landowner before inspecting the land unless there is a particular reason why this is not possible, for example because it has not been possible to identify or locate the landowner. The Council will be open to moves by the landowner (or some other interested party) to help resolve the status of the land themselves. For example, the Council may decide that the land is, or is not, contaminated land on the basis of information provided by the land owner or other interested party, provided the Council is satisfied with the robustness of the information.

Where the owner refuses access, or the landowner cannot be found, the authority will consider using statutory powers of entry. Before doing so, the Council will first satisfy itself that there is a reasonable possibility that a significant contaminant

linkage may exist on the land and will comply with the requirements of the legislation and the Statutory Guidance.

Special Sites and Detailed Inspection by the Environment Agency

If the Council identifies land which it considers (if the land were to be determined as contaminated land) would be likely to be designated as a special site, it will consult the Environment Agency and, subject to the Agency's advice and agreement, arrange for the Agency to carry out any intrusive inspection of the land on its behalf. If necessary, the Council will authorise a person nominated by the Agency to exercise the powers of entry conferred by section 108 of the Environment Act 1995. The Agency will be expected to carry out any intrusive investigations in accordance with appropriate good practice technical procedures for such investigations.

It should be noted that where the Environment Agency carries out an inspection on behalf of the Council, the Council's regulatory functions under Part 2A and the Statutory Guidance remain the Council's sole responsibility. The Agency should advise the Council of its findings in order to enable the Council to carry out these responsibilities.

Using External Expertise during Detailed Inspection

The process of detailed inspection and risk assessment in complex cases may raise issues which are beyond the expertise of any one person. There may be little need to consult others in cases where risks are clearly high or low or where the authority has sufficient internal expertise, but in more complex cases the Council will consider whether to bring in external expertise. The person(s) consulted will depend on the circumstances of the land, and the expertise required and could include other relevant experienced practitioners from Local Authorities or specialist consultants. When choosing to consult, the Council will strive as far as possible to ensure that the person consulted is appropriately qualified and competent to undertake the work.

The Council will be mindful that although external experts may advise on regulatory decisions under the Part 2A regime, the decisions themselves remain the Council's sole responsibility.

Normal Levels of Contamination

The Statutory Guidance is clear that normal levels of contaminants in soil should not be considered to cause land to qualify as contaminated land, unless there is a particular reason to consider otherwise. Therefore, if it is established that land is at or close to normal levels of particular contaminants, it should usually not be considered further in relation to the Part 2A regime. The Council will have regard to the relevant paragraphs of the Statutory Guidance when considering normal levels of contamination and local circumstances.

Recognising and Handling Uncertainty

The Council understands that all risk assessments of potentially contaminated land will involve uncertainty, for example scientific uncertainty over the effects of substances, or assumptions about exposure to substances. When undertaking detailed inspection, the Council will recognise uncertainty and seek to minimise it as far as is relevant, reasonable and practical. Despite this, uncertainty is likely to remain and the Council will be aware of the assumptions and estimates that underlie the risk assessment, and the effect of these on its conclusions.

The Statutory Guidance says that:

‘the uncertainty underlying risk assessments means there is unlikely to be any single “correct” conclusion on precisely what is the level of risk posed by land, and it is possible that different suitably qualified people could come to different conclusions when presented with the same information. It is for the [Council] to use its judgement to form a reasonable view of what it considers the risks to be on the basis of a robust assessment of available evidence in line with this Statutory Guidance’.

Remediation Activity

During detailed inspection, and when determining whether land meets the definition of “contaminated land”, the Council may consider the likely direct and indirect health benefits and impacts of remediation. This could include any risks from contaminants being mobilised during the works, stress-related health effects, and whether the benefits would outweigh the social, financial and economic costs. The Statutory Guidance explains that such an assessment does not need to be a quantified or detailed cost-benefit or sustainability analysis. Rather the Council should make a broad consideration of factors it considers relevant to achieving the aims of Part 2A, the Statutory Guidance and this Strategy.

Once land has been determined, the enforcing authority must consider how it should be remediated and, where appropriate, issue a remediation notice to require such remediation. (The enforcing authority for the purposes of remediation may be the Council, or the Environment Agency, if the land is deemed to be a “special site”).

The Council will have regard to the relevant provisions of Part 2A, the Statutory Guidance and its own aims and objectives within this Strategy when it is:

- (a) deciding what remediation action it should specify in a remediation notice;
- (b) satisfying itself that appropriate remediation is being, or will be, carried out without the service of a notice; or
- (c) deciding what remediation action it should carry out itself.

Progress with Detailed Inspection and Remediation since Publication of the 2001 Strategy

Since 2001, the Council has undertaken detailed inspection of 13 sites within its ownership. This has not identified that any meet the Part 2A definition of “contaminated land”.

The Council has either been consulted about or is aware of voluntary detailed inspection by the owners of a small number of sites (less than 10).

The Council does not record the number of sites where detailed inspection has been conducted as part of the planning process, and whether these have required remediation. Consultation on such sites certainly makes up the significant majority of the contaminated land workload however.

Detailed Inspection and Remediation 2022 - 2027

The Council currently has no plans to undertake detailed inspection at any sites although further investigation is anticipated of the Clifton Hill site to inform future development of this land. The Council will continue to review detailed assessment and remediation works undertaken voluntarily, or through the planning process.

Detailed Inspection of sites, if required, will be undertaken in accordance with the principles outlined above. If at any stage the Council considers, on the basis of information obtained from inspection activities, that there is no longer a reasonable possibility that a significant contaminant linkage exists on the land, it will not carry out any further inspection in relation to that linkage. Notwithstanding the above, detailed inspection of sites will be reviewed where appropriate in the event of significant changes to legislation or guidance, or relevant new information becoming available.

Risk Summaries, Communication and Documentation

Part 2A Documentation

Part 2A and the Statutory Guidance require local authorities to produce a range of notices, documents and information at various stages in the process of dealing with land contamination. The Council will comply with these requirements when taking any action under Part 2A, and will seek advice from the Council's legal team where appropriate.

The most common piece of documentation, which was introduced by the 2012 revision to the Statutory Guidance, will be the Risk Summary. This must be produced for any land which, on the basis of a risk assessment, the authority may be likely to determine. Risk Summaries are not required for land which will not be determined as contaminated land or land which has been prioritised for detailed inspection but which has not yet been subject to risk assessment. Notwithstanding this, the Council will seek to ensure that all decisions made on land contamination are accurately recorded and described.

The Statutory Guidance sets out what must be included in a Risk Summary, and makes it clear that the document must describe the risks identified, and set the risks in context, for example by describing the risk from land contamination relative to other risks that receptors might be expected to be exposed to in any case. It should include a discussion of the uncertainties involved and be understandable to the layperson.

Consultation with Landowners

The Council will consult the landowner before inspecting any land unless there is a particular reason why this is not possible. In accordance with the aims of this Strategy, the Council will seek to ensure that Risk Summaries and all other information is produced in a timely fashion, and bearing in mind the potential impacts of regulatory involvement including health impacts, property blight, and burdens on affected people. Specialist advice will be sought where necessary on the communication of risks and detailed technical information to the public.

Complaints and Notifications by Third Parties

The Council may also receive information about sites from interested parties other than the land owner, for example by complaints from neighbours etc. Complaints will be dealt with following the procedures adopted by the Council for dealing with public health nuisances. It is normal Council policy that anonymous complaints will not be investigated. However, in the case of contaminated land any information received will be recorded and evaluated by Environmental Health and Community Safety to determine the need for further investigation. Complaints may also take the form of anecdotal rather than factual information. In these cases the information will be recorded and evaluated. The information provider will not automatically be

kept informed of action taken by the Council as a result of the receipt of this information.

Contaminated Land Register

The Contaminated Land Public Register will be held by Environmental Health Services. The information placed on the register will be maintained in accordance with the legislation and the Statutory Guidance. This includes information which may be excluded on the grounds of national security or commercial confidentiality.

Providing Information to Third Parties

The City Council receives enquiries from third parties requesting information about individual sites, or sites within a small radius (<500m) of a certain address. The Council will respond to any such written enquiries with the information available in Council files and databases, and in accordance with the Freedom of Information Act (2000) and the Environmental Information Regulations (2004). The Council will charge for time spent in responding to these enquiries. The charge will be reviewed annually by the Environmental Health and Community Safety manager.

If enquiries are received requesting copies of the Council's entire database of sites, or wanting information about large areas of the city, then these will be considered on a case by case basis by the Environmental Health and Community Safety manager.

Procedures

Some relevant procedural aspects of contaminated land work are discussed below. More detailed procedures will be maintained where appropriate by the Environmental Health and Community Safety manager.

Internal Management Arrangements for Inspection and Determination

Implementation of Part 2A is the responsibility of the Environmental Health and Community Safety manager as the lead officer. The strategy will be implemented by the officers of this section. The Environmental Health and Community Safety manager has delegated powers to serve and sign Remediation Notices. The holder of this post may consult with the Legal team where appropriate. Members will be updated via the Scrutiny Committee. Where the Council is liable for remediation work a report will be presented to the Council's Executive prior to the commencement of any work.

Contaminated Land and Development Management

Officers from Environmental Health and Community Safety screen all applications that are received and validated by City Development. Where an application relates to a site where contamination is known or suspected, or is for a sensitive end use, officers will make appropriate comments to the Planning Officer. This could include requesting additional information prior to determination, drafting a suitable condition for any planning consent, or commenting on any submitted report(s). In accordance with the NPPF, officers will ensure that the Development Management process delivers sites that are suitable for their new use. However responsibility for securing a safe development rests with the developer and/or landowner.

There are similar inter-department links between Environmental Health and Community Safety and the Building Control Officers of City Development. Where Building Control Officers are made aware of land contamination the views of Environmental Health and Community Safety officers are sought and acted upon.

Dealing with Urgent Sites

During the work of Environmental Health and Community Safety, sites may come forward which require urgent remediation action, or where continued development may necessitate remedial action and it is not clear that the developer or land owner will achieve this.

In the case of Part 2A investigation, this will include sites where it appears that there is an imminent danger of serious harm or serious pollution of controlled waters being caused as a result of a significant pollutant linkage which has been identified. In these cases the Council will expedite action as far as is possible and in accordance with the legislation and the Statutory Guidance. It may undertake remediation action itself, where consistent with the aims of this Strategy. Prior to

undertaking any action, cases would be referred to the Environmental Health and Community Safety Manager and elected members if it is felt to be appropriate, or if authorisation is needed for any expenditure.

In the case of sites being remediated through development, planning enforcement procedures and notices will be used where necessary and as agreed with City Development to ensure that any planning conditions are complied with.

Notwithstanding the above, it will remain the Council's aim to encourage voluntary investigation and remediation of sites where possible.

Exeter City Council Interests in Land

When dealing with Council owned land it is important that there is close liaison between all the relevant officers for example in Environmental Health, Estates, Legal and Planning and that land contamination issues are considered early in any acquisition, disposal or development process.

As discussed above, risk assessment work has been undertaken for a number of sites in Council ownership which has concluded that none of these sites meet the Part 2A definition of "contaminated land".

Prior to acquiring any new land, detailed investigations will be necessary to ensure that the Council is not inheriting a contamination liability. The Council will seek warranties where appropriate and following advice from Legal Services. When adopting public open space on development sites, the Council will use Section 106 Agreements and planning conditions to ensure that an appropriate level of site investigation and remediation has taken place prior to adoption.

The process of site investigation detailed above will enable the Council, as landowner, to make more informed decisions about its future land dealings and the steps it needs to take in either disposing of, or letting land in future. Individual negotiations that would take place on either disposal or letting would be a matter for the parties to discuss in each case and the outcome may be very different depending upon the particular circumstances.

Contaminated Land 2022-2027

This strategy will be reviewed in 2027, or following a significant change to legislation or guidance (whichever is the sooner). In the next five year period, the Council will:

- Seek further information on potential pollutant linkages, in order to refine the priority of sites for detailed inspection, until the point where it becomes clear that land is not contaminated.
- Review strategic and detailed inspection information in the light of changes to legislation or guidance, as deemed necessary.
- Undertake its contaminated land functions in accordance with legislation, guidance and this Strategy, having particular regard to the overall aims and objectives of the Strategy.

Equality Impact Assessment: Contaminated Land Strategy 2022 to 2027

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

1. Key recommendations:

That Executive:

- 1) note the draft revised Contaminated Land Strategy; and
- 2) support the consultation on the draft strategy commencing 08 September 2021 until 03 November 2021.

2. Committee name and date:

Executive: 07 September 2021.

3. Stakeholders:

The stakeholders to the Contaminated Land Strategy are the Environment Agency, those who own or occupy land affected by contamination, those seeking to develop land affected by contamination and those who have caused or knowingly permitted land to become contaminated to the extent that it meets the legal definition of Contaminated Land.

4. Main beneficiaries are:

The main beneficiaries are the environment, the future occupants of land remediated through the planning process and those who occupy land which meets the legal definition of 'Contaminated Land' but are not liable for remediation of that land (for example they may be tenants who did not cause the contamination and share no liability because they are not land owners).

5. Consultation:

The Council is undertaking consultation on the draft strategy, specifically involving the Environment Agency, Devon County Council, neighbouring authorities, Natural England and Public Health England. Consultation will last 8 weeks.

The strategy will be amended following consultation (if required), and the final Contaminated Land Strategy will be presented to Executive on 30 November 2021 and Full Council on 14 December.

- 6. Factors to consider in the assessment:** For each of the groups below, an assessment has been made on whether the proposed recommendation will have a **positive, negative or neutral impact. This is must be noted in the table below** alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact – some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).	Neutral	Low	The Strategy relates to the condition of land. Decisions are made based upon levels of contamination in the ground irrespective of the race or ethnicity of those who either occupy, own or share some responsibility for the contamination. There is no evidence to suggest that the Strategy would have a potential impact on this characteristic.
Disability: as defined by the Equality Act – a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.	Neutral	Low	The Strategy relates to the condition of land. Decisions are made based upon levels of contamination in the ground. There is no evidence to suggest that the Strategy would have a potential impact on this characteristic.
Sex/Gender	Neutral	Low	The Strategy relates to the condition of land. Decisions are made based upon levels of contamination in the ground. There is no evidence to suggest that the Strategy would have a potential impact on this characteristic. Young female children are considered to be the most sensitive receptors for land contamination on most sites. A risk assessment is therefore likely to be conducted on the basis of understanding the harm to a 0-6 year old female child. However this does not mean that other groups receive lesser protection only that they may not receive a specific risk assessment.
Gender reassignment	Neutral	Low	The Strategy relates to the condition of land. Decisions are made based upon levels of contamination in the ground. There is no evidence to suggest that the Strategy would have a potential impact on this characteristic.
Religion and belief (includes no belief, some philosophical beliefs)	Neutral	Low	The Strategy relates to the condition of land. Decisions are made based upon levels of contamination in the ground. There is no evidence to

such as Buddhism and sects within religions).			suggest that the Strategy would have a potential impact on this characteristic.
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Neutral	Low	The Strategy relates to the condition of land. Decisions are made based upon levels of contamination in the ground. There is no evidence to suggest that the Strategy would have a potential impact on this characteristic.
Age (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).	Neutral	Low	The Strategy relates to the condition of land. Decisions are made based upon levels of contamination in the ground. There is no evidence to suggest that the Strategy would have a potential impact on this characteristic. Young female children are considered to be the most sensitive receptors for land contamination on most sites. A risk assessment is therefore likely to be conducted on the basis of understanding the harm to a 0-6 year old female child. However this does not mean that other groups receive lesser protection only that they may not receive a specific risk assessment.
<p><u>Actions identified that will mitigate any negative impacts and/or promote inclusion</u></p> <ul style="list-style-type: none"> • none 			

Officer: Alex Bulleid

Date: 19 April 2021

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

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