

EXECUTIVE

Date: Tuesday 4 November 2025

Time: 5.30 pm

Venue: Rennes Room, Civic Centre, Paris 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 Manager on 01392 265477.

Entry to the Civic Centre can be gained through the Customer Service Centre, Paris Street.

Membership -

Councillors Bialyk (Chair), Wright (Deputy Chair), Asvachin, Foale, Patrick, Vizard, Williams, R 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 meeting held on 23 September 2025.

(Pages 3 -
14)

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 Act 1972 - Exclusion of Press and Public**

It is considered that the Committee would be unlikely to exclude the press and public during consideration of any of the items on the agenda, but if it should wish to do so, the following resolution should be passed:-

RECOMMENDED that, under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting for the consideration of the particular item(s) on the grounds that it (they) involve(s) the likely disclosure of exempt information as defined in the relevant paragraphs of Part 1, 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 Democratic Services Manager by 10.00am at least three working days prior to the meeting. Further information about speaking at a committee can be found here: [Speaking at a Committee](#)

6 Matters referred by Scrutiny Committees

To consider recommendations made to the Executive from Scrutiny Committees.

7 Request for a variation of Hackney Carriage Fares

To consider the report of the Strategic Director of Operations.

(Pages 15
- 60)

8 Air Quality Annual Status Report and revision of the Air Quality Management Area (AQMA)

To consider the report of the Strategic Director of Operations.

(Pages 61
- 194)

9 Proposed Policy of the Council for an Indemnity To Members And Officers

To consider the report of the Monitoring Officer.

(Pages
195 - 204)

Date of Next Meeting

The next meeting of the Executive will be held on **Wednesday 26 November 2025** 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 Democratic Services at committee.services@exeter.gov.uk

Individual reports on this agenda can be produced in large print on request to Democratic Services committee.services@exeter.gov.uk

EXECUTIVE

Tuesday 23 September 2025

Present:

Councillor Bialyk (Chair)

Councillors Wright, Asvachin, Foale, Patrick, Vizard, Williams, R and Wood

Also present:

Councillor Haigh (as an opposition group Leader);

Councillor Holland (as an opposition group Leader); and

Councillor Moore (as an opposition group Leader).

Also present:

Chief Executive, Strategic Director of Operations, Strategic Director for People and Communities, Head of Legal and Democratic Services & Monitoring Officer, Head of Service - Asset Maintenance, Interim Head of Service - Housing and Democratic Services Manager

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MINUTES

The minutes of the meeting held on 12 August 2025, were taken as read, approved and signed by the Chair as a correct record.

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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

No questions from members of the public were received.

68

MATTERS REFERRED BY SCRUTINY COMMITTEES

There were no matters referred from the Scrutiny Committees for this meeting.

69

ANNUAL SCRUTINY REPORT 2024-25

The Executive received the Scrutiny annual update report in respect of the Scrutiny work achieved during the municipal year 2024-25.

Particular reference was made to:

- the timing was now aligned with the municipal year;
- the new format was highlighted, which provided further details on matters considered by scrutiny, and would be developed further to show the impact that scrutiny achieves; and
- thanks were given to Democratic Services Officer, Liz Smith, for her hard work in conjunction with the members of the Scrutiny Programme Board, to make these changes.

During the debate, the following points were made:

- the report had already been presented to both scrutiny committees;

- the new report layout highlighted the impact of scrutiny and recommendations were now being presented to Executive and actions being taken;
- the changes made to how scrutiny functioned was welcomed; and
- the Portfolio Holder engagement and debates at Scrutiny meetings were useful;

An opposition group leader raised the following points and questions:

- expressed thanks for the for work undertaken on the annual scrutiny report;
- highlighted that a discussion had been held about addressing the wording regarding money relating to a portfolio holder and the important outcome; and
- there was a long-standing request that scrutiny meetings be broadcast to allow the community to see and hear discussions.

In response to questions raised, the Leader advised that the matter for broadcasting scrutiny meetings had been raised last year, and a discussion about the possibility would take place. He also advised that the report was for Council approval, and it was not appropriate for the Executive to make any changes to the scrutiny report.

The Leader moved, and Councillor Wright seconded, the recommendations which were voted upon and CARRIED unanimously.

RECOMMENDED that Council approve the Annual Scrutiny Report 2024/25.

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**AIR QUALITY ANNUAL STATUS REPORT AND REVISION OF THE AIR
QUALITY MANAGEMENT AREA (AQMA)**

The Strategic Director for Operations advised that a deferral of this report was requested to allow for further refinement of the action plan and to conduct more consultation with key stakeholders. It was intended to bring the report back before the next scheduled meeting in November 2025 with a more informative and interactive report.

The Leader advised that questions submitted in advance by Councillor Moore would be answered in writing by the Strategic Director for Operations.

The Leader advised that he would be deferring the report and that a report would be brought back at the earliest opportunity.

RESOLVED that the item be deferred.

71

**FOOD LAW AND HEALTH AND SAFETY ENFORCEMENT SERVICE PLAN
2025-26**

The Executive received the report which sought approval to adopt the statutory Food Law and Health and Safety Service Plan 2025-26, which set out the Council's regulatory function in respect of food safety and health and safety over the forthcoming year.

Particular reference was made to:

- the work was being delivered by the existing Environmental Health team, with no request for additional financial or staffing resources;
- there had been a substantial intervention process, with 11 funeral directors inspected following a national intervention;
- Section 18 of the Health and Safety at Work Act required that the Council intervene in cases of health and safety contravention;

- local authorities were responsible for 65% of work premises nationally, which equated to 48% of workers;
- of 625 food premises inspected, 99% had been judged to be good; and
- 185 new food premises had been registered with 77 proactive health and safety inspections were undertaken, alongside 259 other related visits.

During the debate, the following points were made:

- the detailed report was welcomed and highlighted the impressive work from officers;
- there were some very impressive statistics in the report, and highlighted the essential function being carried out by the Council;
- it was reassuring to know that all food poisoning cases and other infectious diseases were investigated;
- the report reference of the corporate plan required updating and the link appeared to be broken;
- the reference to the apprenticeship and giving an opportunity to develop younger people in the role was welcomed;
- the additional workload required for funeral directors inspections, at short notice was commended; and
- the total number of food businesses due or overdue for inspection had been reduced to 6 between March 2024 and April 2025, which was commended.

An opposition group leader raised the following points and questions:

- how did the Council apply the policy to its own work and how was it monitored? and
- should the Devon Health and Wellbeing Board also be included as a reference?

In response to questions raised, the Strategic Director for Operations advised that:

- the number of eating establishments in the city was 1,070;
- the benchmarking of 99% 'good' vs 56 food poisoning cases was against other authorities and benchmarking data would be shared outside the meeting;
- the links in the report would be checked and updated to ensure they reference the right corporate plan objectives;
- the comparison with previous years for service requests for noise, nuisance, light pollution, business-related antisocial behaviour would be incorporated;
- Heads of Service had working on producing service plans within their service and some of that data had been captured in the report;
- a link to Devon Health and Wellbeing Board could be incorporated; and
- details of interventions across the corporate premises would be provided outside of the meeting.

The Leader moved, and Councillor Wright seconded, the recommendations which were voted upon and CARRIED unanimously.

RESOLVED that the Executive supported the Food Law and Health and Safety Service Plan 2025-26.

RECOMMENDED that Council approve:

- (1) the Food Law and Health and Safety Service Plan 2025/26; and
- (2) that Head of Environment and Waste is authorised to change the plan in the light of national guidance and/or to meet operational needs.

HOUSING DAMP & CONDENSATION POLICY 2025-2030

The Executive received the report which provided a summary of new Housing Damp & Condensation Policy 2025-2030 for adoption, to ensure that Exeter City Council met its statutory obligations under Awaab's Law & the Regulator of Social Housing's Consumer Standards.

Particular reference was made to:

- there were a number of new and updated housing policies being presented at the meeting;
- all the policies had been presented through consultation with the Tenants Voice group and Council Housing and Development Advisory Board;
- the Housing Damp and Condensation Policy was a new policy to reflect the statutory obligations under new Awaab's Law, and the Regulator of Social Housing Consumer Standards that come into force in 2024; and
- adopting the policy would provide a consistent framework for staff and contractors, in ensuring accountability and transparency.

During the debate, the following points were made:

- the new policy and legislation was welcomed;
- the inclusion of advice leaflets to new tenants, preventive measures following received reports and reactive work was important;
- the 11 positive commitments in section 2 of the policy were welcomed, and it was enquired if there were any timescales?
- the proactive approach, over a reactive approach was welcomed and further details were requested;
- had retrofitting reduced mould/damp issues?
- damp and mould had serious impacts on lives, both in social and private housing;
- the council should be commended for being pro-active in addressing the issue;
- the report outlined both proactive measures and effective actions being taken;
- concern was raised about officer capacity to deliver proactive and reactive actions given current workload pressures;
- the national direction to move away from blaming tenant lifestyles was supported.

The Portfolio Holder for Housing, Homelessness Prevention and Customer Services spoke to the item and thanked officers for the work undertaken and advised that it had been welcomed by the Tenants Voice group and Council Housing and Development Advisory Board.

An opposition group leader raised the following points and questions:

- welcomed the importance of the policy; and
- enquired as to what extent did the policy overlap with the Home Adaptations Policy, for major or minor work?

In response to questions raised, the Strategic Director for Operations and the Strategic Director for People and Communities advised that:

- the timescales for the 11 positive commitments were set out in procedure and in Awaab's Law and could be shared outside the meeting. The Council would always follow best practice required in relation to timescales;
- a proactive approach meant that any officer or contractor in contact with a property must engage with tenants, observe conditions, and report signs of damp/mould;
- formal housing stock inspections would also increase as part of a proactive approach;
- retrofitting had provided a positive impact to improved affordable warmth and insulation. There were still some issues to address including enhanced ventilation strategies;
- team capacity was an issue particularly with changes to legislation; however, work was already underway to understand the future demands of the impending new legislation on enhancing tenants' rights both in terms of the Council's role as a social landlord but also in the context of new powers expected in relation to Private Sector Landlords. In anticipation of increased demands, a review of tenancy management and private sector housing services was being undertaken with the aim of modernising and delivering on the new legislative requirements;
- the Tenant's Voice group had recently produced a report on their spotlight review of Damp and Mould which had provided positive feedback and highlighted areas for improvement, particularly regarding the language and response from staff and contractors;
- the Interim Head of Service was responding to the recommendations in the report and how changes would be implemented to ensure staff were aware of how their practices impacted tenants and how these were to be improved; and
- the majority of the statements of need (as required, for major adaptations from a social care occupational therapist) were mainly focussed on mobility related adaptations, including stair lifts, ramps and internal modifications to aid mobility. It was very unusual to receive a statement of need relating to needs that would result in a retrofit to improve energy consumption and reduce bills.

The Leader moved, and Councillor Wright seconded, the recommendations which were voted upon and CARRIED unanimously.

RECOMMENDED that Council approve the adoption of the new Housing Damp & Condensation Policy for the period 2025-2030.

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HOUSING RECHARGES POLICY 2025-2030

As first-time attendees at the Executive, the Chair welcomed the Head of Service – Asset Maintenance and the Interim Head of Service – Housing to the meeting.

The Executive received the report which provided a summary of the new Housing Recharges Policy 2025-2030 for repairs and maintenance works to its properties to ensure they remain in a safe condition, using the rent payable through the Housing Revenue Account to ensure the service represents value for money for legitimate repairs work.

Particular reference was made to the policy as follows:

- the Council had always recharged tenants for work to properties that fell outside of the Council obligations as a landlord, but re-charges were applied on an ad-hoc basis;
- the new policy provided a fair, consistent, and transparent framework for recharging tenants for work required due to damage or negligence;

- the Council was required to operate a cost-effective repair service and demonstrated value for money for tenants;
- the policy aimed to ensure that the Council could recover costs for work that was not part of its legal maintenance responsibility; and
- the implementation of the policy would be monitored to ensure it was applied in a fair and transparent way.

During the debate, the following points were made:

- were re-charges being made previously and were tenants made aware?
- was there an example appendix available of the costs to assure cost recovery?
- assurances were sought on there being consideration of financial hardship and allowing time for tenants to pay even when not technically in hardship;
- how would rechargeable repairs be picked up, i.e. housing officer visits or councillor reports;
- there was a need for clarity on who was responsible for communal grounds, noting inconsistencies across blocks;
- an enquiry was made about the standards for repairs carried out and what interaction and DIY advice had been given to tenants?
- how were standards agreed for unauthorised alterations/improvements and would the approved policy be included in lease materials? and
- was there a time limit for family members to clear out belongings, where a tenant died or a tenancy ended?

In response to questions raised, the Strategic Director for People and Communities and the Interim Head of Service – Housing advised that:

- there should have been an appendix to the policy setting out sample charging information, and this would be provided to Members;
- new tenants would be reminded of their responsibilities to maintain the property in good order and the recharge policy was part of the routine tenancy induction process.
- Officers and contractors would clarify responsibilities and potential charges for existing tenants as part of the routine process of reporting and acting on repairs and maintenance work; and
- housing officers would discuss suspected damage, advise on next steps, and consider costs reasonably and fairly, especially for vulnerable tenants including those acting as executors for deceased tenants.

The Leader moved, and Councillor Wright seconded, the recommendations which were voted upon and CARRIED unanimously.

RECOMMENDED that Council approve the adoption of the new Housing Recharges Policy for the period 2025-2030.

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HOME ADAPTATIONS FOR COUNCIL HOUSING POLICY 2025-2030

The Executive received the report on the revised Home Adaptations for Council Housing Policy 2025- 2030, which aims to ensure the Council is compliant with the Regulator of Social Housing Safety and Quality Standard which are designed to assist tenants seeking housing adaptations to meet assessed health needs.

During the debate, the following points were made:

- clarity was sought on how was the need and solution identified and agreed, were other agencies involved, and to what extent were residents involved, given their lived experience?
- clarity was sought on the differences between major and minor adaptations for eligibility/use of a disabled facilities grants for tenants and private renters;
- clarity was sought on section 5.4 of the policy, regarding requests where the tenant was registered with the Devon Home Choice Scheme being dealt with on an individual basis; and
- there was a case involving a tenant using a wheelchair, who had a kitchen fitted with cupboards they could not reach. The process was unclear for both Councillor and tenant and highlighted a gap where kitchens were being fitted around individuals without proper adaptation alignment.

An opposition group leader raised the following points and questions:

- enquired on timescales and response expectations;
- sought clarification on adaptations policy structure and process for major/minor works; and
- enquired on the faster rehousing through Devon Home Choice.

In response to questions raised, the Strategic Director for People and Communities and the Strategic Director for Operations advised that:

- with further changes expected nationally in relation to funding for home adaptations it was likely that this policy would be revised and brought back to the Executive in the next 12 months to consider additional amendments;
- there were currently two systems in place: national Disabled Facilities Grant funded through the Better Care Fund passported to District Councils through Devon County Council, which could be utilised by people who owned their own homes;
- the other system was rent from the private rented sector. Councils, who owned and run their own social housing were legally obliged to operate within the rules of a Housing Resource Account (HRA) and were required to provide the funding for home adaptations from within the HR. The council had traditionally operated these services separately but as part of the Senior Leadership Restructure, and work was now underway to integrate these services to provide a more streamlined and equitable offer to people irrespective of the tenure of their home;
- the member who had referred to a specific case to contact the Strategic Director for Operations directly so he could investigate the issues;
- minor works included handrails, tap levers and window attachments which could proceed directly;
- major works required a statement of need from Adult Social Care, which was usually provided by an Occupational therapist. Technical assessors would assess the property to identify the specific adaptations which could be made to meet the needs of the resident;
- the majority of referrals were mobility-related needs. In cases where a property was no longer suitable for the needs of the resident and /or proposed adaptations were unreasonable or impractical, there was a prioritised pathway through Devon Home Choice for accelerated rehousing; and
- specific timescales on the completion of adaptations would vary as they were dependant on the scope. Some major works could take considerable time to complete and would require bespoke commissioning whilst many minor works could be undertaken quickly through existing contractor arrangements.

The Leader moved, and Councillor Wright seconded, the recommendations which were voted upon and CARRIED unanimously.

RECOMMENDED that Council approve the adoption of the new Home Adaptations for Council Housing Policy for the period 2025-2030.

75

HOUSING COMPENSATION POLICY 2025-2030

The Executive received the report on the new Housing Compensation Policy 2025-2030, which aims to provide a fair and consistent approach to offering redress and awarding compensation to tenants when service failures occurred. The Policy would align with the Housing Complaints Policy and the Housing Recharges Policy and has been based on the guidelines of the Housing Ombudsman.

Particular reference was made to:

- the new policy formalised compensation practices to ensure a transparent approach; and
- compensation should be fair and proportionate, but it was acknowledged that it may not fully address misconduct; and there were other actions that may need to be considered alongside monetary remediation.

During the debate, the following points were made:

- had there been any major disagreements or dispute with tenants, relating to the policy? and
- was there a budget line for general use or included in major projects?

In response to questions raised, the Strategic Director for People and Communities and the Strategic Director for Operations advised that:

- there had been no major disagreements or issues with tenants;
- there was no designated budget for general compensation but with forensic accounting practices, if required the quantum of compensation payments could be identified;
- setting a budget could be warranted; and
- in the context of a planned project: e.g. a home loss payment when a tenant must move out this would be included in the project budget.

The Leader moved, and Councillor Wright seconded, the recommendations which were voted upon and CARRIED unanimously.

RECOMMENDED that Council approve the adoption of the new Housing Compensation Policy for the period 2025-2030.

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EXETER CITY COUNCIL HOUSING SERVICES HATE CRIME POLICY

The Executive received the report on the proposed Hate Crime Policy 2025-2030 to accompany the previously agreed Housing Anti-Social Behaviour Policy in November 2024, which aimed to address hate crimes and incidents in Council housing communities.

Particular reference was made to:

- the new Hate Crime Policy would function alongside the previously approved Housing Anti-Social Behaviour Policy; and

- the policy had been drafted from a best practice approach would be subject to refinements during implementation.

During the debate, the following points were made:

- it was requested that policy be amended to include non-binary persons along with transgender or perceived transgender definitions; and
- having a separate policy highlighted that hate crime was a criminal act and the policy would strengthening resident awareness to it.

The Portfolio Holder for Housing, Homelessness Prevention and Customer Services spoke to the item and commented on the sadness that such a policy was needed but was very necessary for tenants and the public.

An opposition group leader raised concerns about the Equality Impact Assessment (EQIA) and the inconsistency in detailing impacts across protected characteristics, the potential lack of resident involvement in its creation questioned how residents and officers would understand its potential impacts on various groups.

The Strategic Director for People and Communities advised:

- in 2023 the council had requested a Local Government Associations (LGA) Mini Peer Review on its Equalities Diversity and Inclusion (EDI) policy and practice which identified improvements needed to the Councils approach; and
- as a result, there was a Corporate EDI Improvement plan currently being implemented which includes specific work to upskill staff in relation to the undertaking of Equality Impact Assessments. This training was being rolled out as of the day of the meeting.

The Strategic Director for People and Communities agreed that the Equality Impact Assessment for this policy required further work and requested that the report on this proposed policy be deferred to enable the EQIA to be re-worked and use the existing version as an improvement/training exercise. A report with a reviewed EQIA would be brought back at a future date.

The Leader agreed with deferring the item to allow an update to the EQIA, to ensure it was of the right standard to enable members to make informed decisions.

RESOLVED that the item be deferred.

77

HOUSING ALLOCATIONS POLICY 2025-2030

The Executive received the report on the new Housing Allocations Policy 2025-2030, with aimed to meet the requirements of the Regulator of Social Housing for a housing specific allocations policy detailing how lettings to Council housing stock would be made.

It was explained that the policy set out how the current allocation process worked and there was no change to the current practice. Currently there was detailed procedural policy set out by Devon Home Chose who operated allocations on behalf of social landlords in Devon, which was complex. The policy aimed to provide a more accessible overview to help people understand allocations and information timelines.

During the debate, the following points were made:

- there was support for this approach as it would make it easier for people to understand and would support casework and public queries; and
- an EQIA formatting issue was identified and caution was sought for consistency in the Executives' approach to the report, given the previous item.

The Portfolio Holder for Housing, Homelessness Prevention and Customer Services commended the report which answered a number of questions relating to Devon Homes Choice.

An opposition group leader spoke on this item and referred to Low Housing Need (Band D) in the Devon Home Choice Policy document and sought assurance that those in no permanent homes were supported.

In response to questions raised, the Strategic Director for People and Communities and the Interim Head of Service – Housing advised that:

- the error highlighted in the EQIA looked like it was a formatting error, rather than a more substantial issue, as identified in the Hate Crime Policy EQIA; and
- all the other EQIA's in the report pack would be checked and any formatting errors would be corrected before they went to Council.

The Leader agreed that the EQIA be checked and should it be a formatting error, to be corrected and be included with the minutes before going to Council and moved the following amendment to the recommendation to read as follows:-

- that Council approve the adoption of the new Housing Allocations Policy for the period 2025-2030, subject to the review of the Equality Impact Assessment.

The Leader moved, and Councillor Wright seconded, the amended recommendations which were voted upon and CARRIED unanimously.

RECOMMENDED that Council approve the adoption of the new Housing Allocations Policy for the period 2025-2030, subject to the review of the Equality Impact Assessment.

A copy of the revised Equality Impact Assessment was amended outside of the meeting and is attached to the minutes of the meeting.

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HOUSING COMPLAINTS POLICY 2025-2030

The Executive received the report on the new Housing Complaints Policy 2025-2030, which had been updated from the 2024 version, following receipt of recommendations from the Housing Ombudsman.

During the debate, a Member enquired whether tenant issues were automatically logged as complaints or first handled as concerns?

In response to question raised, the Strategic Director for People and Communities and the Interim Head of Service – Housing advised that:

- corporate complaints were being restructured within the People and Communities directorate to align practice across the Council and included that the good practices in housing for social housing would be rolled out across the council;

- current housing practice treated all issues raised through the process as a formal complaint and followed prescriptive timelines set down in the code of practice; and
- resident feedback was always welcomed and officers did not require hearing the word “complaint” to treat it in terms of guidance set out.

The Leader moved, and Councillor Wright seconded, the recommendations which were voted upon and CARRIED unanimously.

RECOMMENDED that Council approve the adoption of the new Housing Complaints Policy for the 2025-203 period.

(The meeting commenced at 5.30 pm and closed at 7.06 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 14 October 2025.

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REPORT TO EXECUTIVE

Date of Meeting: 4 November 2025

Report of: Strategic Director of Operations

Title: Request for a variation of Hackney Carriage Fares

Is this a Key Decision?

No

Is this an Executive or Council Function?

Executive

1. What is the report about?

1.1 The purpose of this report is to seek authority for a further consultation period to satisfy the legal duties as laid out under Section 65 of the Local Government (Miscellaneous Provisions) Act 1976.

1.2 A request has been received from the Chair of Exeter St Davids Hackney Carriage Association, for an increase to the Hackney Carriage Fare Tariff.

1.3 Executive resolved on 20th May 2025 to consult on proposed revised taxi fares between 27th May and 8th July 2025. There is a strict two-month timescale set down by Section 65 Local Government (Miscellaneous Provisions) Act 1976 to consider representations and set a date for fares to come into effect. The process was not completed in that time. Therefore, the consultation process needs to start again. It is proposed that existing representations are carried forward to the new consultation, the consultation period is in line with the two-week statutory consultation period in accordance with the legislation and authority be delegated to the Strategic Director of Operations and Portfolio Holder for City Management to consider any representations made and whether to introduce the proposed changes, with or without modifications.

2. Recommendations:

2.1 That the Executive approves:

(1) That the fare increase proposals set out at Appendix C are put out to public consultation in accordance with the statutory requirements which will run from 6th November until 20th November 2025.

(2) That the comments received at Appendix D during the earlier consultation will be carried forward to the new consultation and considered alongside any other responses received up to and including 20th November 2025.

(3) That authority be delegated to the Strategic Director of Operations and Portfolio Holder for City Management to consider the representations and determine whether to set a date for the revised table of fares to come into effect with or without modifications.

3. Reasons for the recommendation:

3.1 When considering the proposal, members are reminded that the tariff that is set should be regarded as the maximum fares that can be charged. Taxi proprietors are not tied to charging the maximum fare but are not permitted to charge more than the tariff price shown on the meter. Market forces are known to come into play, and for instance because of the level of competition in Exeter, the driver/ proprietor may decide to charge less than the maximum tariff.

3.2 Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 sets out the public notice requirements, but it is for the Executive Committee to determine whether or not such a consultation should be undertaken based on the proposed tariff table.

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

4.1 There will be a cost in the public consultation of the proposed tariff table as we would be required to place an advert in a local newspaper and also propose to put signs on the taxi rank notice boards, and to email all dual Hackney Carriage Private Hire drivers and local disability support groups.

4.2 The associated newspaper advert costs (in the region of £600), as well as the staff costs from the additional work generated by the consultation are additional costs not budgeted for within the last fees and charges report, and as such these additional costs will need to be considered at the next fees and charges review to avoid Licensing costs impacting on the Council's general fund.

5. Section 151 Officer comments:

5.1 As vehicle licensing is required to be self-financing, the financial implications contained within this report will be contained within the ringfenced account. This is required to break even over a three-year period.

6. What are the legal aspects?

6.1 Section 65 Local Government (Miscellaneous Provisions) Act 1976 gives the Executive Committee power to determine hackney carriage fares. The power is not delegated to officers.

6.2 Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 also sets out the public notice requirements, but it is for the Executive Committee to determine whether or not such a consultation should be undertaken based on the proposed tariff table.

6.3 Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 also sets out the formal statutory procedure for varying the fares. The Council is required to publish a notice containing the proposed variation table in at least one local newspaper and specify a period of not less than 14 days from the first publication of the notice during which time objections to the variation can be made. A date must be specified for the fares to come into force in the event there are no objections. If an objection is duly made and is not withdrawn, the council must set a further date, not later than two months after the first specified date, on which the table of fares shall come into force with or without modifications as decided by them after consideration of the objections.

6.4 It is for the Executive Committee to determine whether or not such a consultation should be undertaken based on the proposed tariff table. It is also for the Executive Committee to determine the length of any consultation however it must be conducted within the statutory timescale, so that if any changes are implemented, they are implemented lawfully.

7. Monitoring Officer's comments:

7.1 Members will note the legal comments. The Monitoring Officer has no additional comments.

8. Equality Act 2010 (The Act)

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

9. Carbon Footprint (Environmental) Implications:

9.1 It was estimated in March 2021 that the transport sector accounted for 29% of the UK's net greenhouse gas emissions (Source: 2020 UK Greenhouse Gas Emissions). The Licensing Committee have previously set ambitious emissions targets for the Exeter Hackney carriage fleet, making it amongst the greenest Hackney carriage fleets in the country. The most recent emissions standards from our taxi policy fully came into effect on 1 January 2020.

9.2 With further reductions in greenhouse gas emissions from transport in mind, it is highly likely that the Licensing Committee will wish to consider introducing further more ambitious emissions targets for Exeter Hackney carriages in the future, and having an appropriate fare table would contribute considerably to the financial viability of any such changes for the Hackney carriage trade.

10. Report details:

10.1 Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 permits Licensing Authorities to set the fares tariff for Hackney carriages (taxis) licensed in the district. The tariff sets the maximum fares that taxis can charge the public when using their vehicles.

10.2 Exeter City Council, in common with most other Councils, have used this power for many years and the last tariff increase was agreed in November 2022. A copy of the proposed tariff table calculation is found at Appendix A. The cost on a per mile basis is found at Table B of Appendix B to this report. To aid comparison the existing 2022 fare table is also included at Table A of Appendix B.

10.3 Since the 2022 tariff change the subject of fare increases has been regularly discussed at Taxi Forum meetings. Throughout this time, the taxi trade's opinion was generally divided in view of the economic situation that some did not wish to see a fare increase as the costs for fares are met by the public using taxis. However, due to increased operating costs it was decided to undertake a fare review in conjunction with the Exeter Hackney Carriage Associations in Autumn 2024.

10.4 The agreed proposal is outlined below:

- An increase in both the flag fall and the daytime tariff 1.
- An increase in both the flag fall and the evening tariff 2.
- An increase in both the flag fall and the weekend and holiday tariff 3.
- The addition of Christmas Day and New Years Day to Tariff 3.
- The complete removal of Tariff 4.
- Retention of the current charge for additional passengers above the first one.
- The introduction of charges for items of luggage (Not to include shopping bags).

10.5 Officers have researched and produced a comparison table of current fares set by this and other authorities in Devon (Table C of Appendix B). The comparison takes into account the position of highest to lowest fares set by all 358 licensing authorities in England and Wales based upon costs of the first two miles journey prepared by the national Private Hire and Taxi Monthly magazine. The present Exeter Tariff 1 cost for a two-mile journey is £7.50.

10.6 The table confirms that Exeter currently has the joint fifth most expensive 2-mile fare level in Devon and is the 133rd most expensive fare in England and Wales over that distance. If the proposed increases are implemented, then Exeter would have the most expensive 2-mile fare level in Devon and would move to approx. 10th position in the national list.

10.7 This Council has not reset its fares since 2022, other authorities have increased fares in 2022, 2023 and 2024.

- Plymouth reset their taxi fares in 2023 and are 60p more expensive than the current Exeter tariff 1;
- South Hams Councils reset their taxi fares in 2022 and are currently 30p more than Exeter's current 2-mile fare;
- East Devon DC increased their tariff fare in 2020, 2022 and 2024 to £8.69, £1.19 more than Exeter's current two-mile fare; and
- Teignbridge DC also raised their fares in 2022, to £7.26, some 24p less than Exeter for a two-mile fare.

10.8 Members may find it useful for an explanation of the current tariff structure operated in this district and there are currently four Tariff levels

- Tariff 1: Applies to any hiring begun between 0700 and 1900 on any day other than Sunday, Public Holidays or Bank Holidays;
- Tariff 2: Applies to any hiring begun on any day (other than Easter Sunday and Public and Bank Holidays) between 1900 and 0700 the following day AND for any hiring on a Sunday from Midnight. This tariff also applies between 0700 and 1900 on Christmas Eve and New Year's Eve;
- Tariff 3: Applies to any hiring begun on Christmas Eve & New Year's Eve from 19.00 until 00.00 AND from Midnight until 07.00 New Year's Day; Good Friday; Easter Sunday; Easter Monday; Mayday; Spring & August Bank Holidays; Christmas Day, Boxing Day; and

- Tariff 4: Applies on Christmas day (24 hours) and New Year's Day from midnight to 7am.

10.9 The proposed tariff structure would be as follows:

- Tariff 1: Applies to any hiring begun between 0700 and 1900 on any day other than Sunday, Public Holidays or Bank Holidays.
- Tariff 2: Applies to any hiring begun on any day (other than Easter Sunday and Public and Bank Holidays) between 1900 and 0700 the following day AND for any hiring on a Sunday. This tariff also applies between 0700 and 1900 on Christmas Eve and New Year's Eve.
- Tariff 3: Applies to any hiring begun on Christmas Eve & New Year's Eve from 19.00 until 00.00 AND Good Friday; Easter Sunday; Easter Monday; Mayday; Spring & August Bank Holidays; Christmas Day, Boxing Day, New Year's Day.
- Tariff 4: Will be removed in its entirety.

10.10 The consultation period to take place between 6 November until 20 November 2025. A public notice will be published on our website and a public notice will be published in a local newspaper as required by statute. Those wishing to engage in the consultation will be able to do so in writing either by email to the Licensing Team by email to licensing.team@exeter.gov.uk or by post to Licensing Team, Civic Centre, Paris Street, Exeter EX1 1RQ.

10.11 The draft notice is attached as Appendix C

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

11.1 The appropriate setting of a taxi tariff table will contribute to a healthy and safe city, and lend support to a robust, business friendly economy.

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

12.1 The publication of a proposal to increase taxi fare levels may lead to criticism by members of the public who rely on such services and are resistant to such changes.

12.2 However, the proposed tariff table has been developed in conjunction with the taxi trade rather than solely by the Licensing Authority, and in the event of adverse consultation responses this matter would be referred back to the Executive Committee for further consideration

13. Are there any other options?

13.1 The Executive Committee may reject the request for consultation on the proposed tariff and instead maintain the existing tariff table. However, this may lead to the taxi trade in Exeter becoming economically unattractive to new taxi drivers/ proprietors and hence effect the trade as a public transport service.

Strategic Director of Operations, Adrian Pengelly

Author: Simon Lane, Head of Environment and Waste

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

Background papers used in compiling this report:-

- Department for Business, Energy and Industrial Strategy: 2020 UK Greenhouse Gas Emissions, provisional figures.
- Private Hire and Taxi Monthly National Hackney Fares table (April 2025).
- Local Government (Miscellaneous Provisions) Act 1976

List of Appendices:

- Appendix A – Fare Calculation
- Appendix B – Proposed, existing and comparison fare tables.
- Appendix C – Draft Notice
- Appendix D – Consultation Comments
- Appendix E – Equalities Impact Assessment

Contact for enquires:
Democratic Services (Committees)
Room 2.35
01392 265275

Exeter Hackney Carriage Fares Calculator 2024

ITEM	Average Running Costs Per Vehicle	Flag Drop	ITEM	Enter Variable Data in Pink Boxes on this sheet and "Calc for running costs"	
1	Annual Salary (A)	T1 3.80	A	Average Salary	£34,840.00
2	Average Running Costs (B X E)+ (C + D + G + H + I)	T2 4.60	B	Costs of Running Diesel Car (per mile)	£0.74 (From "Calc for running costs")
3	Total Running Costs (1 + 2)	T3 5.00	C	Additional Allowance for Insurance	£2,500.00
4	Average Live Mileage (E - F)	T4	D	Annual cost of Hackney Carriage Licence	£430.00
5	Cost per mile 3 ÷ 4		E	Annual Average Mileage	26,060.00
6	Total Charge per Mile (3 - K x T1) ÷ 4	£3.00	F	Dead Mileage	50% 13,030
		£3.75	G	Annual Station Rank Fee	£670.00
	Charge for each Distance Unit is Tariff 1 (incorporating flag drop) 59 yards (L) = 10.00 pence (6 ÷ M)	Tariff 2 10.00	H	Annual Cost of Driver's Licence (Pro-Rata)	£135.00
7	Round to nearest 10 pence	10 pence	I	Average annual cost of Livery, Roof Sign and Meter	£1,130.00
	Rounded Charge per Mile	£3.00	J	Average Journey Distance (Miles)	2.5
		£3.75	K	Average number of journeys	5212.00
	Charge for time per unit	0			
	Charge for time. One mile or and	minutes seconds	L	Distance unit = Unit charge x (1760/charge per mile)	Tariff 1 59 yards Tariff 2 47 yards
			M	Units per mile (1760/Unit Distance)	30.04 37.55
	Date fare chart effective from	Day 1 Month 8 Year 2025	N	Charge per unit (input values from 7)	10.00 pence 10.00 pence
			O	For each passenger in excess of one (pence) (As agreed by officers in consultation with trade)	50 pence
			P	Soiling the carriage leaving it unfit (pounds) (As agreed by officers in consultation with trade)	£100

Version 2Last Verified Jan 2025

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Appendix B

Table A – Existing Exeter Fares

Existing Fare Calculation for Exeter							
	Flag Drop	Distance Unit	First Mile	Running Mile	2 miles	3 miles	5 miles
Tariff 1	£2.70	72 yards	£5.10	£2.50	£7.60	£10.10	£15.10
Tariff 2	£3.20	57 yards	£6.20	£3.10	£9.30	£12.40	£18.60
Tariff 3	£4.00	46 yards	£8.50	£3.80	£12.30	£16.10	£23.70

Table B – Proposed Exeter Fares

Proposed Fare Calculation for Exeter							
	Flag Drop	Distance Unit	First Mile	Running Mile	2 miles	3 miles	5 miles
Tariff 1	£3.80	176 yards	£6.50	£3.00	£9.50	£12.50	£18.50
% Increase	40%		27%	20%	25%	24%	22%
Tariff 2	£4.60	176 yards	£8.00	£3.80	£11.80	£15.60	£23.20
% Increase	44%		29%	22%	27%	25%	25%
Tariff 3	£5.00	176 yards	£9.05	£4.50	£13.55	£18.05	£27.05
% Increase	20%		6.5%	18%	10%	12%	14%

Table C – Devon Authorities Comparison

Council	2 Mile Tariff	Position in National League Table	Last Increase
North Devon	£7.30 (6)	153	2022
East Devon	£8.69 (1)	29	2024
South Hams	£7.80 (3)	96	2022
Teignmouth	£7.26 (7)	158	2022
Plymouth	£8.10 (2)	63	2023
Bristol	£7.60 (4)	114	2023
Mid Devon	£6.80 (8)	223	2021
Exeter (Current)	£7.50 (5)	133	2022
Exeter (Proposed)	£9.50	10	2025

Position in brackets indicated position in Southwest Authorities

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Appendix C

EXETER CITY COUNCIL

Local Government (Miscellaneous Provisions) Act 1976 - Section 65

Notice is hereby given that the Council intends to authorise an increase in the table of fares for journeys by Hackney Carriages and metered Private Hire vehicles in accordance with the schedule set out below.

SCHEDULE OF AUTHORISED FARES

Tariff	Fare	Details
Tariff One (T1)	£3.80 for the first 176 yards (or part thereof) and £0.30 for each subsequent 176 yards (or part thereof).	Applies to any hiring begun between 07.00 and 19.00 on any other day other than Sunday or Bank Holidays.
Tariff Two (T2)	£4.60 for the first 176 yards (or part thereof) and £0.38 for each subsequent 176 yards (or part thereof).	Applies to any hiring begun (other than Easter Sunday and Public and Bank Holiday's) between 19.00 and 07.00 the following day AND for any hiring on a Sunday. Also a hiring between 07.00 and 19.00 on Christmas Eve and New Years Eve.
Tariff Three (T3)	£5.00 for the first 176 yards (or part thereof) and £0.45 for each subsequent 176 yards (or part thereof).	Applies to any hiring begun on Christmas Eve & New Year's Eve from 19.00 until 00.00 AND New Year's Day; Good Friday; Easter Sunday; Easter Monday; Mayday; Spring & August Bank Holidays; Christmas Day, Boxing Day.
Tariff Four (T4)	To be Removed	To be Removed

Additional Charges – Applies to all tariffs

Type	Tariff	Details
Waiting Time	T1: 30p per minute T2: 40p per minute T3: 50p per minute T4: 60p per minute	This additional charge is applied automatically by the meter.
Dogs (excluding assistance dogs)	£1.00	These additional charges are applied by the driver and shown as EXTRAS on the meter
Each extra person	£0.50	
Large Items of Luggage (not shopping bags)	£0.50	Per Item
Fouling inside or outside cab	£100.00	This charge is not shown on the meter and is in addition to the fare shown.

Any person wishing to object to the increase in fares as set out in the Schedule above, or to make any representations in relation thereto, may do so in writing to me at the address given below, stating the objections or representations. Objections or representations must be received by 20th November 2025. The specified date for the purposes of Section 65 Local Government (Miscellaneous Provisions) Act 1976 is 21st November 2025 which is the date on which the increased fares will come into effect if no representations are received.

Objections or representations may also be sent by e-mail to nigel.marston@exeter.gov.uk

Nigel J Marston, Principal Licensing Officer

Exeter City Council, Civic Centre, Paris Street, Exeter, EX1 1RQ

Appendix D

Name	Contact details	Comments
Respondent 1	Provided	As a new start up my cost are very high . Insurance alone was over £3300 This is a lot of fares off Sidwell street, so i am most in favour of the fare increase.
Respondent 2	Provided	<p>I am writing in response to the current consultation regarding the proposed tariff changes for Hackney Carriages in Exeter. As a licensed Hackney Carriage driver operating in the city, I would like to express my full support for the proposed increase in fares.</p> <p>The current tariff has remained unchanged for several years while operating costs have significantly increased. Fuel prices, vehicle maintenance, insurance premiums, and the general cost of living have all risen sharply. These ongoing increases have placed a great deal of financial pressure on drivers, many of whom rely on this trade as their sole source of income.</p> <p>An updated tariff would help to ensure that we can continue providing a reliable, safe, and professional service to the public. It would also help to attract and retain drivers within the trade, which is essential for maintaining sufficient availability of taxis for residents and visitors alike.</p> <p>I believe the proposed changes are both reasonable and necessary to reflect the economic realities we currently face. I therefore urge the Council to implement the new tariff at the earliest opportunity.</p>

		Thank you for considering this representation. Please do not hesitate to contact me should you require any further information.
Respondent 3	Provided	I fully agree to increase the taxi meter tariff because now everything price gone up. I am a hackney driver in exeter
Respondent 4	Provided	I would like to send my support for the tariff increases.
Respondent 5	Provided	<p>The purpose of this e-mail to support the proposed Taxi Fare increase.</p> <p>For many years particularly in the last 3 years my business expenses namely 'Taxi insurance, Road Tax, Taxi plate renewal, Fuel, Taxi Repairs ie.. Mechanic costs etc, as well as the cost of living expenses have been going up, especially certain expenses have almost doubled up in costs.</p> <p>Our business has been also affected by cross boarder hiring and now recently increasing number of Uber drivers.</p> <p>Therefore I strongly support the proposed Taxi Fare increase.</p> <p>Thank you very much for your attention to this matter.</p>
Respondent 6	Provided	<p>Dear licensing officer!</p> <p>I'm writing to support our Hackney carriage tariff increase for so many reasons first of all</p>

		<p>1 cost of living 2 inflation 3 increases licensing fee parking tickets Bus fare anything's you name it gone up Cross border Taxis reduced our work</p> <p>We are really looking forward for fare increase We really appreciate your support</p>
Respondent 7	Provided	<p>I am writing to respectfully support the proposal for a tariff increase for taxi drivers. Over the recent years, the cost of living has risen significantly along with essential expenses such as fuel, vehicle maintenance insurance and licensing fees. These increase have put a substantial financial strain on our ability to continue providing reliable transportation services.</p> <p>We kindly urge your consideration and support for the tariff increase.</p>
Respondent 8	Provided	<p>I'm just letting you know that I wish the pay increase to go ahead, I've been in and around the taxi trade for 50 years, and to be honest never seen earnings so low , in recent years we have witnessed, train drivers, doctors, nurses and many public sector workers receiving pay rises, in order to maintain a decent standard of living, most of my colleagues fall below the national minimum wage, which is unfair, other self employed workers are told by local</p>

		<p>government what they can charge so why are we ?</p> <p>We just want a fair wage for the valued service we offer, we come to work in all weathers dealings with a wide range of people in a professional manner promoting Exeter !!</p> <p>Many private hire companies are charging in excess of £5-£7 pull off and frankly the general public don't realise the difference and we all get tarred with the same barrel.</p>
Respondent 9	Provided	<p>I would like to take this opportunity to thank you for your continued support and hard work in assisting taxi drivers in Exeter. Your efforts in maintaining high standards and helping us provide safe and reliable transport to the public are greatly appreciated. And thank you for all your hard work which you have done.</p> <p>At the same time, I kindly ask you to consider reviewing the current taxi fare rates. With the ongoing increase in the cost of living—including fuel, insurance, maintenance, and vehicle repairs—it has become very difficult for drivers to manage daily expenses and continue working efficiently.</p> <p>A reasonable fare increase would help us cover these rising costs and ensure we can continue to offer the high-quality service that passengers expect.</p>

		Thank you for your understanding and continued support. I look forward to hearing from you.
Respondent 10	Provided	<p>I'm writing to support the proposed Hackney Carriage tariff increase.</p> <p>The reason I'm supporting this increase because to run a Hackney Carriage is more expensive than three years ago for example taxi insurance, car repair ETC and the living cost is is nearly doubled for the last two years.</p> <p>And also the cross border hiring has a bad effect on our trade .</p>
Respondent 11	Provided	<p>I'm writing to support the proposed new Hackney carriage taxi tariff for the last 3 years.</p> <p>The reason I'm going to support this tariff because the cost for the repairing the is gone up by a big margins and of course the living cost is much higher than three years ago.</p>
Respondent 12	Provided	<p>Thank you for sending the attachment letter dated 26th June detailing the proposed Fare Increase 2025.</p> <p>I am writing to support the proposed increase, the first in 3 years.</p> <p>Over the past 3 years there has been a very significant uptick in the costs of Taxi Insurance and other operational costs of running a Hackney Carriage. This is, of course, in</p>

		<p>addition to the increase in the general cost of living.</p> <p>It is also evident that the significant number of additional "out of town" taxis over the past 3 years, operating for Apple close to St David's Station, are having an adverse effect on the volume of our trade.</p> <p>Thank you for your hard work in assisting the Trade in this matter.</p>
Respondent 13	Provided	<p>I apologize for copying the other Licensing Committee members in my previous email. I had assumed they were involved in the decision-making process and unaware of our request regarding the Saturday tariff. Going forward, I will ensure that I communicate directly with you and not include other council members. Occasionally, I may copy our directors so they are aware that we have contacted you.</p> <p>I trust you will be able to present our concerns logically and persuasively to the Licensing Committee. For example:</p> <ul style="list-style-type: none"> • Over the past two years, the cost of gas and electricity has increased by more than 40%. • Insurance premiums have risen by over 40%, along with the prices of many essential commodities.

		<ul style="list-style-type: none"> • Cross-bordering practices have significantly impacted the local taxi trade. • Many drivers are now forced to take on additional jobs just to make ends meet.
Respondent 14	Provided	<p>I am writing to express my full support for the proposed Hackney Carriage tariff increase.</p> <p>Operating a taxi today is significantly more expensive than it was just a few years ago. Costs such as taxi insurance, vehicle maintenance, fuel, and general running expenses have all risen sharply. On top of this, the overall cost of living has nearly doubled over the past two years, putting further pressure on drivers who are simply trying to make an honest living.</p> <p>Hackney Carriage drivers provide an essential public service — we work in all weather conditions, at all hours, and deal with a wide range of passengers with professionalism and care. We also play a key role in representing and promoting Exeter to both residents and visitors.</p> <p>Given all these factors, I believe the proposed tariff increase is not just justified — it's necessary. We are not asking for anything unreasonable — only the ability to earn a fair wage for the essential service we provide.</p>

		Thank you for your time and consideration.
Respondent 15	Provided	I fully support the proposed tariff increase for Hackney Carriages in Exeter. The current rates are outdated and no longer match the rising expenses we face daily as drivers. A fare update is essential for the future of our trade.
Respondent 16	Provided	I'm writing to say I support the new fare proposal for Hackney Carriages. Our costs have gone up substantially in recent years, and the existing tariff is no longer sustainable. This update is fair and much needed.
Respondent 17	Provided	As a licensed driver in Exeter, I support the proposed changes to the Hackney Carriage fares. We've seen fuel, servicing, and insurance prices rise, but our income hasn't kept up.
Respondent 18	Provided	I fully support the proposed tariff increase for Hackney Carriages in Exeter. The current rates are outdated and no longer match the rising expenses we face daily as drivers. I also request to add Saturday to include on tariffs 2 as many companies and councils runs tariff 2 for the whole weekend.
Respondent 19	Provided	I'm writing to express my support for the proposed increase in the taxi tariff. As you know the living cost has increased in every sector from mechanical, includes food paying

		<p>the bills it's all gone up so could you please allow for our Taxi fare to increase.</p> <p>Given the rising cost of living, I believe that an adjustment to the tariff is both necessary and justified. It would help ensure that drivers can continue to provide reliable service while covering their own increasing expenses.</p>
Respondent 20	Provided	<p>I fully support the proposed tariff increase for Hackney Carriages in Exeter. The current rates are outdated and no longer match the rising expenses we face daily as drivers.</p> <p>A fare update is essential for the future of our trade.</p>
Respondent 21	Provided	<p>I'm writing to let you know that I'm fully support the proposed increase, the first in 3 years.</p> <p>For the last 3 years there has been very remarkable raise in the costs of taxi expenses & other operational costs from A to Z to run a Hackney Carriage.</p> <p>And also, there has been a significant uptick in in the general cost of living.</p> <p>As you yourself are aware there are a big number "out of Town" taxis operating in Exeter are having a very bad effect on our trade.</p> <p>I have been in taxi trade nearly 10 years and let's be honest I never seen earnings so low in recent years.</p>

		<p>I and most of my colleagues working long hours and still fall below the national minimum wage, which is utterly unfair, we all want a fair wage for the best & valued service we provide.</p> <p>Many thanks for you great work to protect the Trade in this matter.</p>
Respondent 22	Provided	<p>I confirmed to support the proposed tariff increase.</p> <p>The reason I support because of the vehicle repair is too expensive insurance all other operational cost is very expensive and also so many out of border town taxi operating in Exeter effect our trade.</p>
Respondent 23	Provided	<p>As a licensed Hackney carriage driver in Exeter, I fully support the proposed tariff increase for Hackney carriage in Exeter.</p> <p>We have seen fuel, servicing & insurance price rise but our income hasn't kept up.</p>
Respondent 24	Provided	<p>My name is Nazir Kakar and my taxi number plate is H069 I am happy with new tariff many thanks</p>
Respondent 25	Provided	<p>I fully support the proposed tariff increase for Hackney Carriages in Exeter. The current rates are outdated and no longer match the rising expenses we face daily as drivers.</p> <p>A fare update is essential for the future of our trade.</p>
Respondent 26	Provided	<p>I write to support the suggested tariff changes for Hackney Carriages. With operating costs</p>

		continuously rising, this adjustment is necessary for our survival in the industry. Thank you for your attention.
Respondent 27	Provided	New tariff is very welcomed and could help us cope with the increased cost of living. At the moment it is not only that we struggle but we are always looking for other kind of income.
Respondent 28	Provided	My name is Abdul haydari My plate number is H023 I am happy with new tariff many thanks
Respondent 29	Provided	For current financial situation increase living costs I'm fully agree with new tariff.
Respondent 30	Provided	Dear licensing, I fully support the proposed tariff increase for Hackney carriage in Exeter. The current rates are not enough to keep up with the fuel, insurance and all other maintenance costs. Please approve the proposed fares.
Respondent 31	Provided	I would like to send my support for fare increase, due to cost of leaving
Respondent 32	Provided	<p>As Chairman of the Exeter St Davids Taxi Association, I am writing on behalf of all our drivers to follow up on our request—first made two years ago—for an increase in taxi tariffs. Since the start of the conflict between Ukraine and Russia, the cost of living and business expenses have risen dramatically, placing increasing financial pressure on taxi drivers. Below are some key examples:</p> <ol style="list-style-type: none"> 1. Gas and electricity prices have increased by more than 40%. 2. Insurance premiums have risen by over 40% in the last two years.

		<ol style="list-style-type: none"> 3. The cost of vehicle parts and services has gone up by more than 25%. 4. Prices of everyday commodities continue to climb. 5. Bank interest rates have surged by over 150%. 6. The cost of renewing a taxi plate in Exeter is £430—approximately three times higher than in other Devon cities, where the fee is around £130. 7. Parking charges and even the cost of a cup of coffee have increased significantly. 8. The annual CCTV check fee has gone up from £30 last year to £42.50 this year. <p>These rising costs are unsustainable and severely impact our livelihoods. We believe the proposed tariff adjustment is both fair and necessary under these conditions. I hope this information will support a strong case for licensing to approve our proposed tariff. If needed, I am prepared to organize a formal petition.</p> <p>Thank you for your time and continued support. Please confirm receiving this mail.</p>
Respondent 33	Provided	I'm writing to say I support the new fare proposal for Hackney Carriages.
Respondent 34	Provided	Exeter Taxi Association we are supporting new tariff.
Respondent 35	Provided	I Faruk Yelsali badge number HDO55 wish to say yes I'm supporting new tariff.

Respondent 36	Provided	<p>I would like to offer further support for the proposed Hackney Carriage tariff revision by highlighting the financial pressures currently facing drivers.</p> <p>In the past, we were able to purchase wheelchair-accessible vehicles for around £18,000 to £22,000. Today, the price of these vehicles has increased significantly, often ranging between £34,000 and £42,000. This represents a major investment for any driver.</p> <p>At the same time, the cost of living, particularly mortgage and rent payments, has risen sharply. While the minimum wage has increased (from £10.40 in 2023 to £12.20 per hour now), it has not kept pace with inflation or the growing expenses associated with operating a taxi business.</p> <p>It's important to remember that taxi drivers are members of the public too. Just like our passengers, we are affected by the rising costs of everyday essentials. Whether someone works in transport, hospitality, or any other sector, the financial burden is shared across society.</p> <p>For these reasons, a fare adjustment is not only fair, it is essential to ensure we can continue to provide a reliable and sustainable service to the community.</p>
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		Thank you again for your time and consideration.
Respondent 37	Provided	I'm just letting you know I wish the pay increase to go ahead. I've been in and around the taxi trade for 50 years, and to be honest never seen earnings so low, in recent years we have witnessed train drivers, doctors, nurses and many public sector workers receiving pay rises, in order to maintain a decent standard of living, most of my colleagues fall below the national minimum.
Respondent 38	Provided	<p>Thank you for your consideration to increase Hackney's Tariff. It's obvious how fast prices of foods, goods and services including Council tax are creeping upwards.</p> <p>Therefore, I would like to welcome your proposed fare increase and support it.</p>
Respondent 39	Provided	I am Saduddin Monavari Hackney license number HD302 writing to express my full support for the proposed revision to the Hackney Carriage tariff. I would like to further strengthen the case by outlining the significant financial pressures that drivers are currently facing.
Respondent 40	Provided	I would like the fare for the taxi to be increased. The cost of living has gone up recently and I think it's fair that we have a taxi fare rise to compensate for the extra cost of living.
Respondent 41	Provided	I hope this message finds you well.

		<p>I understand that the proposed Hackney Carriage tariff provision is currently under review by Exeter City Council. As a dedicated taxi driver, I kindly urge you to take into consideration our long-standing request for a tariff increase when making your decision. We, as drivers, have been advocating for this adjustment for a considerable time, and we believe that a fair increase is both necessary and justified, given the rising costs of operation and the essential service we provide to the public. Thank you for your attention to this important matter.</p>
Respondent 42	Provided	<p>I have been taxi business in Exeter City for about 18 years. I own a Hackney Taxi with Exeter Council. This is my only source of income to support my family. Every day inflation is growing up. As I work as a full-time taxi driver I don't get minimum wage on my Job. Since the cost of living is increasing day by day, it is time to increase our taxi fares. I heard A proposal has been submitted to the Exeter City Council Licence committee to increase taxi fares application. I agree with the proposal to increase our taxi fares. I hope you will agree with this proposal and increase our taxi Fares.</p>
Respondent 43	Provided	<p>I'm writing to say I fully support the tariff increase for Hackney carriage because our costs have risen significantly Kind regards Aman Rezai</p>

Respondent 44	Provided	Daily life expenses has increased not to mention the fuel, insurance and taxi services. I think it is fair to get tariff increased especially tariff 1.
Respondent 45	Provided	I write to support the suggested tariff changes for Hackney Carriages. With operating costs continuously rising, this adjustment is necessary for our survival in the industry. Thank you for your attention.
Respondent 46	Provided	My name is Mr Sobir Ahmed my plate number is H004. I would like our taxi tariff to increase because the living costs is getting very expensive.
Respondent 47	Provided	I am welcome new tariff
Respondent 48	Provided	I support the proposed Hackney Carriage tariff update.
Respondent 49	Provided	I am writing to you to support the submitted proposal of Hackney Carriage tariff revision.
Respondent 50	Provided	I fully support the proposed tariff increase for Hackney Carriages in Exeter. The current rates are outdated and no longer match the rising expenses we face daily as drivers. A fare update is essential for the future of our trade.
Respondent 51	Provided	I write to support the suggested tariff changes for Hackney Carriages. With operating costs continuously rising, this adjustment is necessary for our survival in the industry. Thank you for your attention.
Respondent 52	Provided	I fully support the proposed tariff increase for Hackney Carriages in Exeter. The current rates

		<p>are outdated and no longer match the rising expenses we face daily as drivers.</p> <p>I suggest to change Saturday to tariff 2 as well. Private hire Apple taxi work on tariff 2 in weekends and all our neighbouring councils operate in tariff 2 in weekend.</p> <p>East Devon District Council increased their tariff twice in last 2 years and their starting price much higher than us.</p> <p>A fare update is essential for the future of our trade.</p>
Respondent 53	Provided	<p>I am writing to express my full support for the proposed revision to the Hackney Carriage tariff. I would like to further strengthen the case by outlining the significant financial pressures that drivers are currently facing.</p> <p>As you know since last tariff rise everything gone up the cost of living gone up now is the time to get a fair raise for the taxi drivers</p>
Respondent 54	Provided	<p>I am writing to express my full support for the revised Hackney Carriage tariff currently under consultation. It's a needed change for the sustainability of our work.</p>
Respondent 55	Provided	<p>I am writing to express my full support for the revised Hackney Carriage tariff currently under consultation. It's a needed change for the sustainability of our work.</p> <p>The reason I'm supporting this proposed increase because the car repair and all other expenses more expensive than two years ago.</p> <p>And of course, the living costs.</p>

Respondent 56	Provided	I'm just letting you know that I wish the pay increase to go ahead I've been in and around the taxi trade for 15 years thanks
Respondent 57	Provided	I am writing to express my support for the proposed tariff increase. As we are all aware, the cost of living has risen significantly in recent times. An adjustment to the current tariff will help drivers better manage their daily expenses and continue to provide reliable transportation services to the public. I trust this proposal will be given due consideration and hope the relevant authorities will review and implement the increase accordingly.
Respondent 58	Provided	I'm strongly support hackney carriage new tariff. Because on most goods prices gone up. Car insurance, repair maintenance gone up. Thank you for your decisions.
Respondent 59	Provided	Please accept this letter as my support for the new Hackney Carriage tariff under review. We've waited a long time for an update, and it's becoming harder to cover our daily costs. Thank you for your hard work in assisting the Trade in this matter.
Respondent 60	Provided	I'm writing this email to show my support for the new proposal ahead. Thank you
Respondent 61	Provided	I just wanted to take this opportunity to say that I agree with the new tariff price increase for Hackney.

Respondent 62	Provided	I am very pleased with the new tariff and hope this will help a bit with daily life cost
Respondent 63	Provided	we've seen marketing new tariff Hackney carriage.im supporting the tariff, because on market all goods prices gone up 'thank you for your dedication.
Respondent 64	Provided	I am happy to increase the price of Hackney carriage and new tariffs
Respondent 65	Provided	I write to support the suggested tariff changes for Hackney Carriages. With operating costs continuously rising, this adjustment is necessary for our survival.
Respondent 66	Provided	I fully support the taxi tariff
Respondent 67		I'm writing to express my full support for the taxi fare price increase. The current meter rate, especially during the daytime is not sufficient to cover rising costs.
Respondent 68	Provided	I fully support the proposed tariff increase for Hackney Carriages in Exeter. The current rates are outdated and no longer match the rising expenses we face daily as drivers. A fare update is essential for the future of our trade.
Respondent 69	Provided	I would like to increase the Hackney carriage tariff because our living costs, fuel, insurance high. I'm agree about increase the tariff.

Name	Contact Details	Comments
Respondent 1	Provided	<p>Hi</p> <p>I noticed that there is a consultation around potentially increasing fares within Exeter.</p> <p>I work and travel a fair bit across a number of cities in the country, utilizing the train but then also taxis (including Uber) to get me to my final destination.</p> <p>I feel Exeter is very expensive. if i get an Uber in Birmingham and travel 3.7 miles it costs me under £9 - i have done the same journey with a standard taxi and only cost £11.</p> <p>If i get a taxi from Exeter St Davids to my home (3.3 miles) it costs me over £17</p> <p>That means I am paying nearly double for a shorter journey.</p> <p>In addition the vehicles are generally noisier and older than those i pick up elsewhere.</p> <p>I a) strongly feel Exeter lacks competition and therefore prices are high - we are behind the national curve and as a consumer i suffer and b) an further increase would exacerbate this further</p> <p>I don't feel this is important to just me as an individual but it also makes it expensive for</p>

		businesses in a region that desperately needs more growth
Respondent 2	Provided	<p>Taxi fares are a misnomer as nothing can be compared to them & it is all an unfair scheme as the bus service is so absolutely dire.....& has been for years now....</p> <p>They are late, they don't show up- at all...</p> <p>They miss buses off the schedule ...they fly past you at bus stops.;0(</p> <p>The loos at the bus station are awful.cramped, & dirty.(but the loos everywhere are shocking in Exeter.It is embarrassingly , awful & so shameful.)</p> <p>The whole place is far too small & far too dirty. Door ways , floors, glass, slide bars at doors.Everything is very dirty & run down,sadly.</p> <p>There is never any one on duty for missing buses explanations.</p> <p>I have absolutely no idea where our council tax goes...</p> <p>It is not on litter (I pick 3 bags a week & have done so for 5 years here)</p>

		<p>It is not on parks nor any flower borders , =all we have left of those are our memories.I remember roses, most of all.</p> <p>It is not on tree protection , - hundreds down.:0(</p> <p>It is not on water ways protection / swwa.</p> <p>It is not on services, bus, as above but also public toilets & libraryonly open now 2 days a week.:0(</p> <p>It is never, ever, in any justice system for victims .</p> <p>It is not on protection of our skies where Chem trails pour down upon us all, - every day - & our sun has gone forever , stolen, & our weather is delivered by loud & endless -planes Ruining us all & our environment & wildlife & food growing.</p> <p>Yet public Co2 has ZERO effect on our planet.It is all a scam. Even our output is less than 1% whilst China is 35% +.</p> <p>So taxis.... I don't know where it fits in, in the the big scheme of things.</p> <p>Devon used to be so lovely.</p>
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Consultation Responses – Against the Increase

		<p>Exeter is an Eye sore.I wish, wish, I never had to say that ...but it is.</p> <p>& None of it matters , none of it, compared to what is really happening to us all.</p>
Respondent 3	Provided	<p>I am writing to express my concernun at the proposed hikes in taxi fares across Exeter.</p> <p>Given that bus services have decreased substantially over the past few years, we find ourselves having to use taxis if we want a meal out in town.</p> <p>We only live in Countess Wear but it already costs us nearly £10 just to travel the short distance home.</p> <p>If prices continue to rise, we will have to stop visiting the city's restaurants. Surely the council should be encouraging people to visit Exeter & support local businesses rather than putting such trips out of many people's reach?</p> <p>Submitted for your consideration during the consultation period please.</p>
Respondent 4	Provided	<p>I have felt compelled to submit a formal objection in response to the proposed increases to taxi fares in Exeter — specifically the 39% rise in the base fare</p>

		<p>and the 20% increase in the daytime mileage rate.</p> <p>While I understand these figures represent the maximum permitted, I must express my deep concern. The current cost of taxi travel is already unaffordable for many full time year round residents, particularly those who are vulnerable and have few, if any, alternatives — including older people and those living with illness or disability. From personal experience, I know the financial pressure these costs can place on individuals and families. For some, the choice really is between <i>heating, eating, or travel</i>.</p> <p>In light of this, I would be grateful if you could share the impact assessment that informed this proposal. Specifically, I would be interested in the following:</p> <ul style="list-style-type: none"> • The current average cost of typical journeys in Exeter, and how this compares to the proposed fares (in £ and % terms); • The estimated average increase in journey cost and how this compares with the rise in average private sector wages over the same period (from 2022); • The demographic profile of regular taxi users (those travelling) in Exeter split day vs. night
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		<ul style="list-style-type: none">• The proportion of drivers currently charging the maximum permitted fare;• The actual average base fare and per-mile rate currently charged across the city. <p>I’ve included below a list of current maximum per-mile rates in selected UK cities (sourced using AI tools) to aid comparison. I would appreciate it if you could confirm how Exeter’s current and proposed rates compare with other UK areas, and in particular how they relate to factors such as income deprivation, age, disability rates, and average earnings.</p> <table><tr><th>Area</th><th>Approx. £/mile</th></tr><tr><td>Coventry</td><td>£3.11</td></tr><tr><td>Leeds</td><td>£3.06</td></tr><tr><td>Oxford</td><td>£3.04</td></tr><tr><td>Cambridge</td><td>£3.03</td></tr><tr><td>London</td><td>£2.99</td></tr><tr><td>Bristol</td><td>£2.90</td></tr><tr><td>Southampton</td><td>£2.89</td></tr><tr><td>Manchester</td><td>£2.82</td></tr></table>	Area	Approx. £/mile	Coventry	£3.11	Leeds	£3.06	Oxford	£3.04	Cambridge	£3.03	London	£2.99	Bristol	£2.90	Southampton	£2.89	Manchester	£2.82
Area	Approx. £/mile																			
Coventry	£3.11																			
Leeds	£3.06																			
Oxford	£3.04																			
Cambridge	£3.03																			
London	£2.99																			
Bristol	£2.90																			
Southampton	£2.89																			
Manchester	£2.82																			

		<p>Birmingham £2.81</p> <p>Thank you for taking the time to consider this feedback. I sincerely hope this proposal will be reconsidered in the interests of fairness and accessibility for all members of our community.</p> <p>Finally, I am copying in my MP to ask for his position on this matter. Unfortunately, I am unable to copy in my Exeter City Councillor, as — despite living in Tithebarn and having to use a lot of ECC services — my area is not represented on Exeter City Council.</p>
Respondent 5	Provided	<p>I'm told you're looking for reaction to the proposed taxi fare increases; these increases are ridiculously high! & fares are too high anyway. I suggest you look at typical taxi fares across the country - I moved to Sidmouth from the Maidenhead area 4 years ago & the fares there are much more reasonable.</p> <p>Sidmouth fares are very high already - eg a trip to the airport! & that's if you can get one as they are scarce!</p>

Consultation Responses – Against the Increase

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Equality Impact Assessment: Proposed Hackney Carriage (Taxi) Fare Tariff Changes

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:

The report outlines a proposal to consider changes to the current taxi tariff table.

Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 permits Licensing Authorities to set the fares tariff for Hackney carriages (taxis) licensed in the district. The tariff sets the maximum fares that taxis can charge the public when using their vehicles. Exeter City Council, in common with most other Councils, have used this power for many years and the last tariff increase was agreed in November 2022.

All changes to the hackney carriage tariff table in use in Exeter must be approved by the Executive. The legislation requires that before any alteration to the tariff table can take effect a public notice explaining the changes must be placed in a local newspaper. The public then must be provided with a period of at least 14 days to make comment on the proposals. If no adverse comment/objection is received the approved changes must take effect. Alternatively if adverse comment/objection is received then the matter must be returned to allow the Executive to consider the representation(s).

Research conducted by the Licensing Authority confirms that Exeter currently has the fifth most expensive 2-mile fare level in Devon and is the 133rd most expensive fare in the UK over that distance. If the proposed increases are implemented then Exeter would have the most expensive 2-mile fare level in Devon, and would move to approximately 10th position in the national list.

It is recommended that the Executive give consideration to the draft tariff table to be consulted upon as attached and agree:

- (1) That the proposals are put out to public consultation to run from 2 June until 13 July 2025 (6 weeks);
- (2) That a public notice containing the proposed variation table is published in one local newspaper during the above period; and
- (3) The matter is brought back to Executive on 27 September 2025 for determination.

2. **Committee name and date:** Executive 27 September 2025
3. **Stakeholders:** Residents, Elected Members, Visitors to the City and Hackney Carriage Trade
4. **Main beneficiaries are:** The Hackney carriage trade. Residents, Elected Members and Visitors to the City through a properly funded Hackney carriage trade providing a high quality service.
5. **Consultation:** Minimum 14 day consultation following newspaper advert required by Section 65 of the Local Government (Miscellaneous Provisions) Act 1976, but in this instance we have proposed a 42 day consultation.
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).	There is no evidence to suggest that the proposed policy amendment 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.	Negative	Medium	<p>POSITIVE A properly resourced taxi trade with an appropriate tariff table would mean that the taxi trade remains economically stable, thereby attracting new drivers into the trade to continue and improve this vital public transport.</p> <p>NEGATIVE Wheelchair users and disabled persons are statistically more likely to use taxis than persons who do not identify themselves as disabled. As such a rise in the tariff table would impact this group more economically. Significant price rises may lead to taxis becoming less affordable and as such increase the risk of social exclusion amongst those who rely on taxis for their transport needs.</p> <p>Some potential mitigation may be provided by including relevant local disability groups in the consultation process. Should adverse consultation responses be received then the matter would be referred back to the Licensing Committee for further consideration.</p>

			Local disability groups were included in the consultation, and they have not responded to the consultation.
Sex/Gender	There is no evidence to suggest that the proposed policy amendment would have a potential impact on this characteristic.		
Gender reassignment	There is no evidence to suggest that the action plan would have a potential impact on this characteristic.		
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	There is no evidence to suggest that the action plan would have a potential impact on this characteristic.		
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	There is no evidence to suggest that the action plan 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).	Negative	Medium	<p>POSITIVE A properly resourced taxi trade with an appropriate tariff table would mean that the taxi trade remains economically stable, thereby attracting new drivers into the trade to continue and improve this vital public transport.</p> <p>NEGATIVE Surveys by the DFT have identified that young adults and elderly persons are more likely than other age groups to use taxis on a regular basis. As such a rise in the tariff table would impact these age groups more economically, particularly the elderly who are more likely to have a fixed income. Significant price rises may lead to taxis becoming less affordable and as such increase the risk of social exclusion amongst those who rely on taxis for their transport needs.</p> <p>Some potential mitigation may be provided by including relevant local age awareness groups in the consultation process. Should adverse consultation responses be received then the matter would be referred back to the Licensing Committee for further consideration.</p> <p>Age UK as the foremost organisation representing elderly persons were consulted on the proposals but have not provided a response.</p>
<p><u>Actions identified that will mitigate any negative impacts and/or promote inclusion</u></p> <ul style="list-style-type: none"> • Promotion of the consultation to local age and disability awareness groups to ensure that their views are taken into consideration, with any negative comments triggering a referral back to the Licensing Committee for further consideration. • Age UK as the foremost organisation representing the elderly have been consulted. • Various local disability groups have been consulted. 			

Officer: Simon Lane
Date: 17.07.2025

REPORT TO EXECUTIVE

Date of Meeting: 4 November 2025

REPORT TO COUNCIL

Date of Meeting: 9 December 2025

Report of: Strategic Director of Operations

Title: Air Quality Annual Status Report and revision of the Air Quality Management Area (AQMA)

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 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 2024, a summary of the actions taken in that year to improve local air quality and future plans.

1.2 To seek approval to consult on a revision of the Air Quality Management Area in line with statutory requirements.

2. Recommendations:

2.1 That Executive Committee notes the statutory annual status report.

2.2 That Executive Committee approves the consultation on revising the Air Quality Management Area that will run from 5 November 2025 until 16 January 2026.

2.3 That Council notes the statutory annual status report.

2.4 That an update be provided to Executive, if necessary (should the Department for Food and Rural Affairs (DEFRA), later provide clarification of their expectations regarding the timetable for future actions by the City Council).

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.

3.2 The current Air Quality Management Area (AQMA) is substantially larger than it needs to be, because of improvements in air quality. It does not focus on the small area where

pollution levels exceed the air quality objectives, as set out in the Air Quality (England) Regulations 2010. The planned consultation seeks to meet the legal duties in this regard of focussing attention where it is most required.

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

4.1 The City Council will continue to monitor air pollution and report on levels. This will take place within existing resources. In the coming years, the Air Quality Management Area (AQMA) boundary will need to be reviewed in line with government statutory guidance and a new Air Quality Action Plan (AQAP) produced.

5. Section 151 Officer comments:

5.1 There are no financial implications contained in this report.

6. What are the legal aspects?

6.1 Part IV of the Environment Act 1995 (as amended by the Environment Act 2021) 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 2010. 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 (PG22). The guidance gives particular focus to so-called 'priority pollutants' such as Nitrogen Dioxide (NO₂) and so-called 'Particulate Matter' (PM₁₀ and PM_{2.5}) 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'.

6.3 The Environment Act 2021 amended the Environment Act 1995 so that where local authority is not required to declare an Air Quality Management Area they are expected to develop and publish a local Air Quality Strategy. The content of each strategy will be determined locally but should be produced in consultation with the director of public health and set out the steps the local authority will take to improve local air quality.

7. Monitoring Officer's comments:

7.1 The purpose of this report is to provide members with an update on the air quality of its area. Members will note the content of the report together with the attached 2025 Air Quality Annual Status Report and DEFRA appraisal.

8. Equality Act 2010 (The Act)

8.1 In recommending this proposal potential impact has been identified on people with protected characteristics as determined by the Act and an Equality Impact Assessment has been included as Appendix 3 in the background papers for Member's attention.

9. Carbon Footprint (Environmental) Implications:

9.1 Measures to improve local air quality will also reduce carbon emissions from transport (although the opposite is not always true). The recommendations of this report therefore align with and support the Council's carbon reduction target (carbon neutral by 2030).

10. Report details:

10.1 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 $\mu\text{g}/\text{m}^3$, and the average level for one hour, which should not exceed 200 $\mu\text{g}/\text{m}^3$ 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 $\mu\text{g}/\text{m}^3$ 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.

10.2 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 are not representative of typical or average conditions across the city. Instead, most of the monitoring sites are indicative of the worst-case locations.

10.3 The number of sites which exceed the objective has reduced significantly since the AQMA was declared (a reduction from 32 exceedances in 2009 to none in 2024). The highest levels are measured on the Heavitree corridor, at East Wonford Hill. Here levels have previously been close to or above the levels which indicates an exceedance of the hourly objective but in since 2019 have been significantly lower (at 38.2 $\mu\text{g}/\text{m}^3$ in 2020, 42.2 in 2021, 40.4 in 2022, 40.5 in 2023 and 38.1 in 2024).

10.4 The measured results 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 nitrogen dioxide at every site, including East Wonford Hill were below the objective levels in 2024.

10.5 This pattern is partially explained by traffic flows, which remain below 2015 levels, except for Heavitree Road, where traffic flows were 4% above 2015 levels in 2024.

10.6 The report covers part of the period during which Devon County Council introduced temporary changes to prohibit through traffic in the Heavitree area. This is discussed in section 3.2.1 of the report. The 2023 ASR found that no impact of the highway changes could be seen in the 2023 data set for the monitoring sites that would be expected to have been impacted. The same was true in 2024. There does not appear to be a different trend between the two sets of data which correspond to monitoring locations close to and

distant from the Heavitree area. We believe other factors also influence pollution levels on a year-to-year basis, making it challenging to isolate the impact of the highway changes.

10.7 Only one site (East Wonford Hill) had levels in 2024 between 35 and 40 $\mu\text{g}/\text{m}^3$ (i.e. close to but not above the objective level of 40). 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.

10.8 As you move away from busy roads, levels in previous years have fallen below 25 $\mu\text{g}/\text{m}^3$. In 2024, 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, but a small number are exposed at home to levels close to the objective. No schools in Exeter experience levels above the objective.

10.9 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 $\text{PM}_{2.5}$ but should use best endeavours. 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.

10.10 The annual average legal limit currently applicable for $\text{PM}_{2.5}$ is 20 $\mu\text{g}/\text{m}^3$ and there is no suggestion that this level is being exceeded in Exeter. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 introduced a new target for national government of 10 $\mu\text{g}/\text{m}^3$ as an annual mean, to be achieved by 2040. Currently it seems likely that large parts of Exeter meet this level (based on national modelling) but areas close to specific sources may not. The Regulations also introduce a population exposure reduction target for national government; that there is at least a 35% reduction in population exposure by the end of 31st December 2040, as compared with the average population exposure in the three-year period from 1st January 2016 to 31st December 2018.

10.11 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). A revision of the Air Quality Action Plan will be presented to committee for consultation in 2026 once the consultation and adoption of a new Air Quality Management Area has been concluded. This is in line with the legislation and statutory guidance that the Council must follow.

10.12 The Annual Status report concludes that previous exceedences of the nitrogen dioxide (NO_2) objective at the Blackboy Road / Pinhoe Road junction have been permanently resolved given that they had fallen below 40 $\mu\text{g}/\text{m}^3$ in 2018 and therefore have been below the objective for more than 5 years. Other sites (Alphington Street, Livery Dole, Satutory Mount, Fore Street Heavitree inbound and Honiton Road) were above the objective in 2019 but have not been since. This means that there have now been five years of results at these sites which are below the objective level (although two of these were affected by Covid and lockdowns).

10.13 In the 2023 Annual Status Report, the Council suggested that it would be appropriate to amend the AQMA to reflect the current areas of exceedence and to do this to coincide with the natural end of the AQAP. However in DEFRA's appraisal of the Annual Status report last year it advised 'ECC to wait until compliance has been achieved in 2022, 2023 and 2024 in the areas where ECC are proposing to remove the AQMA, before proceeding with plans to amend the AQMA.'

10.14 The data for 2024 does show continued compliance so this latest Annual Status Report proposes that the Council follow the approach in the statutory guidance to amend the AQMA order and reduce the boundary to just the area of exceedence on East Wonford Hill. The proposed timetable for this process is as follows.

Date	Actions
June 2025	Submit ASR, announcing need for amendment of AQMA (with proposed new boundary) as well as timetable for consultation and publication of new AQAP
4 November 2025 Executive committee	ASR presented to committee for approval and start of consultation period on new AQMA order.
By end of January 2026	Consideration of consultation responses for AQMA order.
By end of February 2026	Final draft AQMA order submitted to DEFRA for approval
By end of April 2026	New AQMA order signed.
March / April 2026	Pre-Election period
June 2026	Provisional start of public consultation on draft AQAP following comments back from DEFRA. Consultation to last 10 weeks.
June 2026	Submit ASR with update on progress and timetable
September 2026 Executive committee	ASR presented to committee with consultation results of AQAP.

10.15 The Annual Status Report describes the proposed, smaller AQMA boundary, as well as including a consultation plan and equalities impact assessment for making the necessary changes to the AQMA order (Appendix F of the Annual Status Report).

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

11.1 Successful implementation of measures to improve local air quality 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.

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

12.1 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.

12.2 There would be legal and reputational risks in not producing a new Air Quality Action Plan during 2026 as this would mean that the authority would not be compliant with legislation.

12.3 There are also risks in the implementation of measures to improve air quality, such as insufficient funding or resource availability, which in turn could have an impact to health especially those with specific vulnerabilities. This is acknowledged within the Annual Status Report.

13. Are there any other options?

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

13.2 Whilst the recommendation to consult on a revision of the Air Quality Management Area (AQMA) is based upon statutory guidance and advice from DEFRA through successive annual appraisal reports, it could be decided to maintain the current Air Quality Management Area. This would then mean that the current Air Quality Action Plan would need to be reviewed on the current Air Quality Management Area and a future report would need to set out the proposals to fulfil the duties as required under the Act.

13.3 Where local authority is not required to declare an Air Quality Management Area they are expected to develop and publish a local Air Quality Strategy. The content of each strategy will be determined locally but should be produced in consultation with the director of public health and other statutory partners and sets out the steps the local authority will take to improve local air quality. At present as Exeter has an Air Quality Management Area and needs to maintain one due to one locality not having 3 successive years without exceedance. Therefore, there is no legal requirement for the Authority to draw up an Air Quality Strategy.

Strategic Director of Operations, Adrian Pengelly

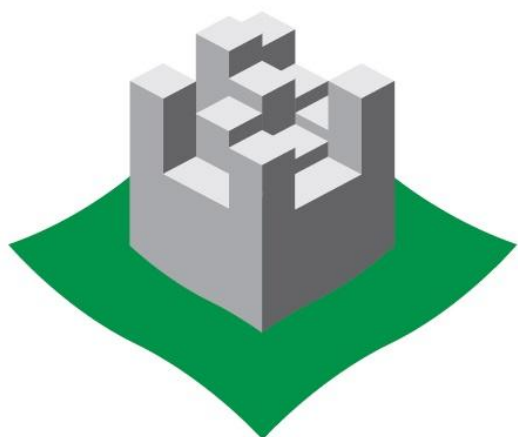
Author: Simon Lane, Head of Environment and Waste

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

Background papers used in compiling this report:-

None

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Room 2.35
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Exeter
City Council

2025 Air Quality Annual Status Report (ASR)

In fulfilment of Part IV of the Environment Act 1995
Local Air Quality Management, as amended by the
Environment Act 2021

Date: June 2025

Information	Exeter City Council Details
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Report Reference Number	ASR 2024
Date	June 2025

Local Responsibilities and Commitment

This annual status report was prepared by the Environmental Health Services of Exeter City Council with the support and agreement of the following officers and departments:

Exeter City Council - City Development

Exeter City Council – Active and Healthy People Programme

Devon County Council - Highways

This ASR has been approved by:

Head of Environment and Waste. Once the report has been checked by DEFRA it will be presented to members at committee.

This ASR has been signed off by Devon County Council's Director of Public Health.

If you have any comments on this annual status report please send them to Head of Environment and Waste at:

Exeter City Council, Environmental Health Services, Civic Centre, Paris Street, Exeter EX1 1RQ

01392 265147

Email: environmental.health@exeter.gov.uk

Executive Summary: Air Quality in Our Area

Air Quality in Exeter

Breathing in polluted air affects our health and costs the NHS and our society billions of pounds each year. Air pollution is recognised as a contributing factor in the onset of heart disease and cancer and can cause a range of health impacts, including effects on lung function, exacerbation of asthma, increases in hospital admissions and mortality.

Air pollution particularly affects the most vulnerable in society, children, the elderly, and those with existing heart and lung conditions. Low-income communities are also disproportionately impacted by poor air quality, exacerbating health and social inequalities.

Table ES 1 provides a brief explanation of the key pollutants relevant to Local Air Quality Management and the kind of activities they might arise from.

Table ES 1 - Description of Key Pollutants

Pollutant	Description
Nitrogen Dioxide (NO ₂)	Nitrogen dioxide is a gas which is generally emitted from high-temperature combustion processes such as road transport or energy generation.
Sulphur Dioxide (SO ₂)	Sulphur dioxide (SO ₂) is a corrosive gas which is predominantly produced from the combustion of coal or crude oil.
Particulate Matter (PM ₁₀ and PM _{2.5})	<p>Particulate matter is everything in the air that is not a gas.</p> <p>Particles can come from natural sources such as pollen, as well as human made sources such as smoke from fires, emissions from industry and dust from tyres and brakes.</p> <p>PM₁₀ refers to particles under 10 micrometres. Fine particulate matter or PM_{2.5} are particles under 2.5 micrometres.</p>

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.

Exeter City Council declared an Air Quality Management Area (AQMA) in 2011 because levels of nitrogen dioxide (NO₂) exceeded both the annual average and the short-term objectives for that pollutant. A map of the area can be found in Appendix D. The Air Quality Action Plan (AQAP) contains measures to reduce pollution levels in the AQMA. 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](#). The Council recognises that this Action Plan has expired and proposed a timetable for review of the AQMA boundary and revision of the AQAP in the last Annual Status Report (in 2024). However, DEFRA's appraisal of that report stated 'we advise ECC to wait until compliance has been achieved in 2022, 2023 and 2024 in the areas where ECC are proposing to remove the AQMA, before proceeding with plans to amend the AQMA.' The current Air Quality Action Plan (AQAP) expired at the end of 2024, but we do plan on publishing a new AQAP which focuses on the amended AQMA. 'We have repeatedly sought clarification from DEFRA on how to proceed with the action plan, but at the time of submitting this ASR have received no response.

Review of the AQMA boundary is required because concentrations of NO₂ have fallen significantly since the AQMA was declared. The diffusion tube data show that no locations measured an exceedance of the proxy for the hourly objective in 2024 (an annual average of 60 µg/m³). 2024 was also the first year in which no sites in the city exceeded the annual average objective either. In 2023, just one site at East Wonford Hill (DT57) had exceeded this objective. In 2024, it was 1.9 µg/m³ below the objective of 40µg/m³. This marks a significant improvement in air quality over the lifetime of the AQMA.

Prior to 2020, the annual average objective was regularly exceeded at a number of places in the city. A significant fall in concentrations was seen in 2020 as a result of a reduction in traffic flows during COVID-19. This rebounded in 2021 but not back to pre-pandemic levels. There was then a further fall in concentrations seen at most sites in 2022, with concentrations roughly stable since then. The improvement since 2019 is likely to have been caused by a combination of traffic flows generally still being slightly below those seen before COVID, the ongoing improvement in vehicle emissions technologies and measures taken by the City Council and partners to implement the Air Quality Action Plan.

It seems certain that previous exceedences at the Blackboy Road / Pinhoe Road junction (DT42 and DT43) have been permanently resolved given that they had fallen below 40 $\mu\text{g}/\text{m}^3$ in 2018 and therefore have been below the objective for more than six years. Other sites (Alphington Street DT19, Livery Dole DT52, Salutory Mount DT54, Fore Street Heavitree inbound DT56 and Honiton Road DT58) were above the objective in 2019 but have not been since. This means that there have now been five years of results that are below the objective level, three of which were unaffected by COVID and its lockdowns. The only site where levels over the annual average objective have been measured in any of the last three years is East Wonford Hill (DT57), but results from this location exhibit a consistent downward trend.

The Council therefore intends to follow the approach in the statutory guidance and the last DEFRA Annual Status Report Appraisal Report (published in 2024); that is to amend the AQMA to reflect areas of compliance in 2022, 2023 and 2024. The proposal is to reduce the AQMA to just the area which was above the objective level in 2023 at East Wonford Hill. Following the subsequent consultation and agreement of a new AQMA, a new AQAP will be produced focussing on the new AQMA area. The proposed timetable for this process is as follows:

Date	Actions
June 2025	Submit ASR, announcing need for amendment of AQMA (with proposed new boundary) as well as timetable for consultation and publication of new AQAP
November Executive committee (date TBC)	ASR presented to committee for approval and start of consultation period on new AQMA order.
By end of January 2026	Consideration of consultation responses for AQMA order.
By end of February 2026	Final draft AQMA order submitted to DEFRA for approval
By end of April 2026	New AQMA order signed.
March / April 2026	Pre-Election period
June 2026	Provisional start of public consultation on draft AQAP following comments back from DEFRA. Consultation to last 10 weeks.
June 2026	Submit ASR with update on progress and timetable
September 2026 Executive committee (date TBC)	ASR presented to committee with consultation results of AQAP.

Following advice from DEFRA, the AQMA boundary can be reviewed this year because we now have at least three years of compliance post COVID. The drafting, consultation and adoption of a new AQAP has to take place within 18 months of the adoption of a new AQMA. The revised AQAP will be based upon the revised AQMA. Full public consultation

will be undertaken as part of the production of the plan, so those affected will have the opportunity to comment on it.

The proposed new AQMA boundary and an explanation of how this has been derived is included in Appendix F.

In September 2023 temporary changes were made to prohibit through traffic in the Heavitree residential area. In June 2024 the HaTOC committee voted to end the trial. This only affected parts of the 2023 (September to December) and 2024 (January to July) monitoring years reported so any changes in traffic flows or nitrogen dioxide levels as a result would not be as significant as if the change had co-incided with the calendar year.

The 2024 Annual Status Report reported that no impact from these temporary changes could be seen in the 2023 data. This report considers the period of the trial that occurred during 2024. It shows again that no difference can be seen between the data for monitoring locations close to the Heavitree area and those distant from it.

Actions to Improve Air Quality

Whilst air quality has improved significantly in recent decades, there are some areas where local action is needed to protect people and the environment from the effects of air pollution. The Council and its partners have taken the following actions in the past year:

1. Devon County Council (DCC) continues to implement the 2020 Transport Strategy. This has three themes: Greater Connectivity, Greater Places for People and Greater Innovation. Key targets within the strategy include:
 - a) 50% of trips by foot or cycle within the city;
 - b) Removal of air quality exceedances in the city.
2. DCC adopted the Exeter Local Cycling and Walking Infrastructure Plan (LCWIP) in January 2024.
3. Work has taken place to deliver the E12 ('north-south') cycle route. This includes:
 - a. construction of a segregated cycle route on Rifford Road, with options to connect into the E9 route or beyond towards the Valley Park / River Exe Estuary,
 - b. completion of designs for the Polsloe Bridge Toucan Crossing and the Honiton Road Sparrow Crossing, and
 - c. early design of the "Heart of Wonford" scheme.

4. A new station opened at Marsh Barton in July 2023, providing easy rail access to Marsh Barton (Exeter's largest industrial estate) as well as Exeter Canal/ Riverside Valley Park and it is the closest station to the new developments in South West Exeter. It is located on the line between Paignton and Exmouth, with half-hourly services at peak times.
5. The Okehampton railway line has reopened to hourly services daily. This provides a valuable alternative to car travel for people coming into the city from the area north of Dartmoor and increased service frequency from Crediton. Design work is underway to deliver the Okehampton Interchange, which is a 'Parkway style' station, funded through DfT Levelling Up Funds. It will serve the wider rural catchment areas of west Devon, Torridge and north Cornwall.
6. Bus patronage has recovered to some extent from the effect of COVID-19 lockdowns. DCC have obtained £14m funding (over 3 years) for its Bus Service Improvement Plan (BSIP). This includes plans for improving bus priority on four key Exeter corridors (the Eastern, Central, Western and Northern corridors). Proposals include improving bus priority using technology, bus lane operation time changes, and physical infrastructure improvements. DCC also have been successful in a joint bid with Stagecoach to provide electric ('Zebra') buses on routes 4, A, and C. These buses will be entering service in 2025/26. Work has also commenced at Matford bus depot for charging infrastructure.
7. The Exeter Plan will be the new Local Plan for Exeter. It will shape the future of Exeter for the next 20 years, to 2041, and will be the basis for how the city continues to evolve and meet the needs of the community. It will be the main planning document for the Exeter City, setting out where development should take place and providing the policies which will be used in making decisions on planning applications. During 2024, work progressed on further evidence and the draft plan such that the Publication Draft was published on 12 December 2024 for formal representations prior to submission to the Secretary of State in summer 2025.
8. Scrutiny of planning applications for air quality impacts has continued, 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 policies.
9. DEFRA grant funding was obtained for a project to develop a virtual monitoring network to model pollution concentrations in the Heavitree corridor. It aims to provide better spatial and temporal resolution than the current monitoring. This will

- be overlaid with health information, enabling more informed choices by the travelling public. Work on the project progressed according to the project plan during 2024. 17 Internet-of-Thing air quality sensors were installed during 2023. Since then, virtual sensing algorithms have been developed and trained using diffusion tube monthly data and live AURN data. An offline rapid prototype model was developed. The most recent information on the project is available at [this link](#).
10. Further refinement of the net zero plan for Exeter. Executive & Council have agreed for the City Council to take on the leadership role for city wide net zero. A programme manager was recruited and started in August 2024, since then has been working with organisations, businesses and communities across Exeter for reducing their carbon emissions. A new Climate and Nature Group (including organisations, business and community groups) has been set up as part of The Exeter Partnership.
 11. The large solar array with battery storage at Water Lane installed by Exeter City Council is operational. During 2024 it successfully powered the first three of an intended fleet of electric refuse collection vehicles along with a number of other electric vehicles that the Council has added to its fleet.
 12. From 1st January 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.
 13. The Council has achieved a reduction in NO_x emissions from buildings as a result of a variety of measures intended primarily to address fuel poverty and carbon emissions. These include:
 - a. building PassivHaus standard homes, an Extra Care facility and leisure centre,
 - b. continued implementation of district heating schemes to provide heating and hot water to 2800 homes at Monkerton, Tithebarn, Mosshayne, Pinn Court, Park Farm, and Exeter Science Park
 - c. working with a number of other city public sector partners to create a new District Heat Network across the city centre, and
 - d. receiving a grant to replace gas boilers with heat pumps at the RAMM and the Riverside leisure centre in a two-year project, to be completed by April 2025. This will reduce NO_x emissions from the old boilers.

14. Plans were developed for the roll out of EV charging infrastructure across City Car Parks to commence in 2025/26, to support the transition to electric vehicles.
15. Car park charges were increased by 5% in October 2024 as planned. Mary Arches surface and MSCP is expected to be sold in late 2025. Harlequins Car park is expected to close late 2024 / early 2025, as part of the wider redevelopment of the Harlequins Shopping Centre, so total car park provision will reduce as a measure to encourage travels by public transport.
16. Devon and Torbay Local Transport Plan 4, which sets out a vision for improving transport across Devon and Torbay in the period 2025 – 2040, has been endorsed by DCC's Cabinet and is planned to be submitted to the Devon and Torbay Combined County Authority for adoption.

Exeter City Council worked to implement these measures in partnership with the following stakeholders during 2024:

- Neighbouring local authorities
- Devon County Council

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

Conclusions and Priorities

No areas in the city are thought to exceed the objectives for nitrogen dioxide, PM_{2.5} and PM₁₀ concentrations in 2024. NO₂ levels in Exeter in 2024 are below those measured in 2023 and well below pre-pandemic concentrations. There is now sufficient data to confirm that only one location (East Wonford Hill) has been above the annual mean objective in any of the last three years, prior to 2024. It is proposed to reduce the AQMA boundary as described in Appendix F so that it only includes East Wonford Hill and allows a new, focussed Action Plan to be produced. A timetable for these changes is shown above.

Exeter City Council's priorities for the coming year shall be the implementation of the process for the amendments to the AQMA order and AQMA boundary and starting the process of developing a new AQAP.

How to get Involved

Local air pollution currently has a high profile within the city. For example, nearly 3000 people were involved in the consultation on the current AQAP and Devon County Council have committed in their Transportation Strategy to resolve exceedances of the objective.

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 to 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 2024. It fulfils the requirements of Local Air Quality Management (LAQM) as set out in Part IV of the Environment Act (1995), as amended by the Environment Act (2021), 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 order to achieve and maintain the objectives and the dates by which each measure will be carried out. 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 E1.

2 Actions to Improve Air Quality

2.1 Air Quality Management Areas

Air Quality Management Areas (AQMA) 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 18 months. The AQAP should specify how air quality targets will be achieved and maintained and provide dates by which measures will be carried out.

A summary of the Exeter City Council AQMA can be found in Table 2.1. This is the only AQMA that is currently designated within Exeter. Appendix D: Map(s) of Monitoring Locations and AQMA provides maps of the area and the air quality monitoring locations in relation to it. The air quality objectives pertinent to the current AQMA designation are:

- NO₂ annual mean;
- NO₂ hourly mean.

We propose to amend the current Exeter AQMA by reducing its extent significantly, such that the amended AQMA only covers East Wonford Hill in the Heavitree area. We also propose to remove the NO₂ hourly objective from the AQMA order.

These amendments were initially proposed in ASR 2024, however DEFRA in its Appraisal Report stated 'we advise ECC to wait until compliance has been achieved in 2022, 2023 and 2024 in the areas where ECC are proposing to remove the AQMA, before proceeding with plans to amend the AQMA.'

The 2024 data supports the previous proposal to significantly reduce the area of the AQMA. Our previous justifications for these amendments remain valid and are summarised below:

- East Wonford Hill is the only monitoring site with exceedances above the NO₂ annual mean objective in any of the last three years prior to 2024.
- The air quality monitoring data across the city as a whole exhibits a consistent downward trend.
- The NO₂ hourly objective has not been exceeded within Exeter in any of the past five years.

The Council is confident that compliance in the areas that will be removed from the AQMA is representative of typical conditions and will be maintained after the revocation as required by the Environmental Acts 1995 and 2021.

The proposed new AQMA boundary and an explanation of how this has been derived is included in Appendix F. An Equality Impact Assessment for the proposed change is also included.

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	Number of Years Compliant with Air Quality Objective	Name and Date of AQAP Publication	Web Link to AQAP
Exeter AQMA 1	Declared 2007, Amended 2011	NO ₂ Annual Mean	An area encompassing the radial routes into the city and other major routes	No	70 µg/m ³	N/A	1 year	Exeter AQAP 2019-2024	www.exeter.gov.uk/airpollution
Exeter AQMA 1	Declared 2007, Amended 2011	NO ₂ Hourly Mean	An area encompassing the radial routes into the city and other major routes	No	65 µg/m ³	N/A	6 years	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".

Exeter City Council has taken forward several direct measures during the current reporting year of 2024 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 Exeter City Council have made during the reporting year of 2024 presented. 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 AQAP, the Physical Activity Strategy, the Local Walking and Cycling Infrastructure Plan, the Bus Service Improvement Plan and Transport Strategy. Key completed measures are:

1. Devon County Council (DCC) continues to implement the 2020 Transport Strategy. This has three themes: Greater Connectivity, Greater Places for People and Greater Innovation. Key targets within the strategy include:
 - 50% of trips by foot or cycle within the city;
 - Removal of air quality exceedances in the city.
2. DCC adopted the Exeter Local Cycling and Walking Infrastructure Plan (LCWIP) in January 2024.
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 - construction of a segregated cycle route on Rifford Road, with options to connect into the E9 route or beyond towards the Valley Park / River Exe Estuary,
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4. A new station opened at Marsh Barton in July 2023, providing easy rail access to Marsh Barton (Exeter's largest industrial estate) as well as Exeter Canal/ Riverside Valley Park and it is the closest station to the new developments in South West

Exeter. It is located on the line between Paignton and Exmouth, with half-hourly services at peak times.

5. The Okehampton railway line has reopened to hourly services daily. This provides a valuable alternative to car travel for people coming into the city from the area north of Dartmoor and increased service frequency from Crediton. Design work is underway to deliver the Okehampton Interchange, which is a 'Parkway style' station, funded through DfT Levelling Up Funds. It will serve the wider rural catchment areas of west Devon, Torridge and north Cornwall.
6. Bus patronage has recovered to some extent from the effect of COVID-19 lockdowns. DCC have obtained £14m funding (over 3 years) for its Bus Service Improvement Plan (BSIP). This includes plans for improving bus priority on four key Exeter corridors (the Eastern, Central, Western and Northern corridors). Proposals include improving bus priority using technology, bus lane operation time changes, and physical infrastructure improvements. DCC also have been successful in a joint bid with Stagecoach to provide electric ('Zebra') buses on routes 4, A, and C. These buses will be entering service in 2025/26. Work has also commenced at Matford bus depot for charging infrastructure.
7. The Exeter Plan will be the new Local Plan for Exeter. It will shape the future of Exeter for the next 20 years, to 2041, and will be the basis for how the city continues to evolve and meet the needs of the community. It will be the main planning document for the Exeter City, setting out where development should take place and providing the policies which will be used in making decisions on planning applications. During 2024 work progressed on further evidence and the draft plan such that the Publication Draft was published on 12 December 2024 for formal representations prior to submission to the Secretary of State in summer 2025.
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9. DEFRA grant funding was obtained for a project to develop a virtual monitoring network to model pollution concentrations in the Heavitree corridor. It aims to provide better spatial and temporal resolution than the current monitoring. This will be overlaid with health information, enabling more informed choices by the travelling public. Work on the project progressed according to the project plan during 2024. Seventeen Internet-of-Thing air quality sensors were installed during

2023. Since then, virtual sensing algorithms have been developed and trained using diffusion tube monthly data and AURN data. An offline rapid prototype model was also developed. The information of the project is available at [this link](#).
10. Further refinement of the net zero plan for Exeter. Executive & Council have agreed for the City Council to take on the leadership role for city wide net zero. A programme manager was recruited and started in August 2024, since then, has been working with organisations, businesses and communities across Exeter for reducing their carbon emissions. A new Climate and Nature Group (including organisations, business and community groups) has been set up as part of The Exeter Partnership.
 11. The large solar array with battery storage at Water Lane installed by Exeter City Council is operational. During 2024 it successfully powered the first three of an intended fleet of electric refuse collection vehicles along with a number of other electric vehicles that the Council has added to its fleet.
 12. 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.
 13. The Council has achieved a reduction in NO_x emissions from buildings as a result of a variety of measures intended primarily to address fuel poverty and carbon emissions. These include:
 - a. building PassivHaus standard homes, an Extra Care facility and leisure centre,
 - b. continued implementation of district heating schemes to provide heating and hot water to 2800 homes at Monkerton, Tithebarn, Mosshayne, Pinn Court, Park Farm, and Exeter Science Park
 - c. working with a number of other city public sector partners to create a new District Heat Network across the city centre, and
 - d. receiving a grant to replace gas boilers with heat pumps at the RAMM and the Riverside leisure centre in a two-year project to be completed by April 2025. This will reduce NO_x emissions from the old boilers.
 14. Plans were developed for the roll out of EV charging infrastructure across City Car Parks to commence in 2025/26, to support the transition to electric vehicles.
 15. Car park charges were increased by 5% in October 2024 as planned. Mary Arches surface and MSCP is expected to be sold in late 2025. Harlequins Car park is expected to close late 2024 / early 2025, as part of the wider redevelopment of the

Harlequins Shopping Centre, so total car park provision will reduce as a measure to encourage travel by public transport.

16. Devon and Torbay Local Transport Plan 4, which sets out a vision for improving transport across Devon and Torbay in the period 2025 – 2040, has been endorsed by DCC's Cabinet and is planned to be submitted to the Devon and Torbay Combined County Authority for adoption.

Exeter City Council worked to implement these measures in partnership with the following stakeholders during 2024:

- Neighbouring local authorities
- Devon County Council

Exeter City Council expects the following key measures to be completed over the course of the next reporting year:

- Amendment of the AQMA and the commencement of work on a new AQAP, with key partners such as Devon County Council and the Devon and Torbay Combined Authority.
- Continued implementation of the Transport Strategy, Local Cycling and Walking Implementation plan and Bus Service Improvement Plan. The intent of these measures is to further improve the air quality of Exeter (from the Transport Strategy).
- Development of the E12 cycle route
- Introduction of electric buses to the Stagecoach fleet
- Provision of electric vehicle chargers in Council car parks

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

Exeter City Council's priority for the coming year shall be the implementation of the process for the amendments to the AQMA order and AQMA boundary and starting the process of developing a new AQAP.

Whilst the measures stated above and in Table 2.2 already help to contribute towards compliance, Exeter City Council anticipates that further additional measures not yet prescribed may be required in subsequent years to achieve continuous compliance of the nitrogen dioxide annual means with the objective for two more consecutive years, thus enabling the revocation of the amended Exeter AQMA. This will be discussed further in the revised AQAP.

Table 2.2 – Progress on Measures to Improve Air Quality

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	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	Ongoing Programme	DCC via Transport Strategy and Exeter City Futures, Sport England Local Delivery Pilot	SELDP, DCC, Developer Contributions, Grant Funding where available and ECC	Partially Funded	£50k - £100k	Implementation	The target for design of permanent changes to the Heavitree corridor area will be to eliminate exceedances. 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 measures introduced in 2020, including a new 5km cross city route (E9 Newcourt/Pynes Hill to City centre) have been made permanent with road closures and modal filters on Ludwell Lane, Dryden Road, Wonford Road and Magdalen Road. School streets introduced at Whipton Barton School and Ladysmith School. A wider package of measures, including play streets is being developed by the Sport England team.	Plans need community ownership to be successful
2 (amber measure)	Access Fund and cycle/walking network, Local Walking and Cycling Infrastructure Plan (LCWIP)	Transport Planning and Infrastructure	Other	2019	Ongoing Programme	DCC via Transport Strategy	Access Fund	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	Modal filters introduced under emergency active travel fund made permanent to deliver sections of the E9 route between Pynes Hill and City centre via the RD&E. E12 route on Rifford Road under construction. Bi-directional route on Sweetbrier Lane delivered. The LCWIP was adopted in January 2024	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding
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	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 and Science Park Park and Change sites delivered. Okehampton line reopened for hourly, daily travel and new station delivered at Marsh Barton. Improved walking and cycling infrastructure delivered on Rydon Lane connecting Woodbury to the Exe Estuary Trail. Further consultation held to close the lane to motorised traffic. Modal filter on Langaton Lane constructed, delivering quiet lane link between Pinhoe area, Exeter Science Park and wider East Devon	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
													strategic employment sites. Balls Farm Road modal filter near Alphington constructed to improve quiet lane linkages between Ide and Exeter. Plans being developed for improving bus priority to reduce journey times and improve reliability. Funding obtained for electric buses on routes 4, A and Green P&R.	
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	Ongoing Programme	ECC via Local Plan	ECC	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	Parking charges across Exeter are designed to balance the need for parking against the harm that private car travel into the city centre can cause, especially at peak times.	The need to balance action against any real or perceived impact on local businesses.
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	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)	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	DCC via Transport Strategy and Exeter City Futures	DCC, grant funding as available and developer contributions	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, one way system for Queen Street (allowing for the footway to be widened). Liveable Exeter vision for the city published, which includes development on car parks, and a reduction in road space for cars. Quay to City route improvements made (Quay Hill two-way cycling allowed, a plant box introduced at Commercial Road to prevent cars blocking walking and cycling access and a contra-flow cycle lane provided at West Street). Local Walking and Cycling Implementation Plan adopted January 2024.	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 Travel Alternatives	Other	2019	Ongoing Programme	ECC via Sport England Local	Sport England funding	Partially Funded	£50k - £100k	Implementation	4% reduction in emissions at East Wonford Hill	School Streets introduced	Trials at three primary schools in 2020, two made	Plans will be developed in

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
	promoting active travel, building on the success of the Heavitree pilot					Delivery Pilot & Exeter City Futures					(shared across all measures which will in combination achieve the targeted reduction in private car commutes)		permanent (Whipton Barton and Ladysmith). Community Builders and new SELDP local Physical Activity Organisers delivered play street 'non car events'	individual areas with local communities.
8 (amber measure)	Use social prescribing and community building to help individuals get and stay active	Public Information	Other	2019	Ongoing Programme	ECC via Sport England Local Delivery Pilot and local Health Service providers	Sport England funding	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.	
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	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 to be delivered first. Focus on sites becoming more accessible for sustainable transport and increased active travel infrastructure	Obtaining necessary permissions and consents, and funding
10 (yellow measure)	Communications plan, to support measures that will achieve modal shift	Public Information	Other	2019	Ongoing Programme	ECC via Sport England Local Delivery Pilot & Exeter City Futures	ECC via existing internal budgets, Sport England Local Delivery Pilot & Exeter City Futures	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.	Completion of DEFRA grant project for Heavitree area	DEFRA grant funding obtained for project to develop air quality information and communications specific to the Heavitree area. 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	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	Implementation of expansions to schemes, as funding is obtained	A substantial network of bikes and cars was created	Devon County Council considering the procurement of a new provider

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
											reliably model the impact of this measure alone on emissions			
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	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. Devon County Council's Bus Service Improvement Plan will deliver improved services and access across the County. Funding obtained for electric buses on routes 4, A and C	Dependent on funding availability and future demand for public transport.
13	Developers to mitigate the effects of their development on air quality	Policy Guidance and Development Control	Other policy	2019	Ongoing Programme	ECC via the Exeter Plan	Within existing ECC resources	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	The Exeter Plan will replace the GESP, as the new Local Plan for Exeter. The Publication draft was released in December 2024 for representations. It will be submitted to the Secretary of State in summer 2025 for examination.	The AQAP originally envisaged that this would be delivered by the GESP. The Exeter Plan will shape the future of Exeter for the next 20 years to 2041. It will be the main planning document for Exeter, setting out where development should take place and providing the policies which will be used in making decisions on planning applications. In fact, the Exeter Plan has already brought forward the Water Lane redevelopment.
14	Policies deliver development where private car use is not the only realistic travel choice	Policy Guidance and Development Control	Other policy	2019	Ongoing Programme	ECC via the Exeter Plan	Within existing ECC resources	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. Until the Exeter Plan is published, officers will be implementing current policy in a robust manner e.g. when considering retail park applications and new housing.	Work on the Liveable Exeter project continues alongside the Exeter Plan. The Liveable Water Lane Supplementary Planning Document, including a design code, was adopted by ECC in 2024. Liveable Exeter held the 'This Is Our City' community engagement event at the RAMM.
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, BID, DCC and developers	TBC once strategy adopted	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	Completion of Strategy and then implementation	St Sidwells Point leisure centre open. South Street plan completed and awaiting funding to deliver. Consultants are reviewing City Centre Strategy	

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
											Council's aspirations for active and healthy travel.			
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 Programme	ECC	Internal ECC budgets	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.	Completion of DEFRA grant funded project	DEFRA grant funding obtained for project to develop air quality information and communications specific to the Heavitree area. Baseline evidence report completed subject to annual review following publication of each year's measurement data and any new research, national guidance etc.	ECC and EGP have decided to use a webpage as the basis of the dissemination tool.
17	An air pollution monitoring network that supports the measures in this action plan	Public Information	Other	2019	Ongoing Programme	ECC	Internal ECC budgets or grant funding if available	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	Diffusion tube monitoring network remains under review. DEFRA grant funding obtained for project to develop air quality information and communications specific to the Heavitree area which includes use of new sensor technologies.	Seventeen IoT air quality sensors were installed. Virtual sensing algorithms were developed, using monthly DT data and RAMM AURN data as training data. An offline rapid prototype model was then created.

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

As detailed in Policy Guidance LAQM.PG22 (Chapter 8) and the Air Quality Strategy¹, local authorities are expected to work towards reducing emissions and/or concentrations of fine particulate matter (PM_{2.5}). There is clear evidence that PM_{2.5} (particulate matter smaller 2.5 micrometres) has a significant impact on human health, including premature mortality, allergic reactions, and cardiovascular diseases.

Department of Health & Social Care's [Public Health Outcomes Framework](#) tool shows that the fraction of mortality attributable to particulate air pollution in Exeter for 2023 was 4.2% (no more recent data is available). This is below the regional figure for the south west (4.3%) and the national level of 5.2%. Exeter therefore has levels of particulate matter which are causing harm, but this problem is less severe than in the majority of the country. The data is available at [this link](#). These mortality fractions are based on PM_{2.5} annual mean concentrations of 5.6 µg/m³ (for Exeter as a whole), 5.7 µg/m³ (for the south west) and 7.0 µg/m³ (England). These indicate that concentrations of fine particulate matter in Exeter are slightly lower the south west regional figure, and much lower than the national figure.

Since August 2018, Exeter City Council has been directly monitoring roadside PM_{2.5} concentrations in Exeter at two sites, i.e. CM1 at RAMM and CM2 at Alphington Street. However, faults with the equipment at CM1 mean that data from this site is not available for this reporting period. In 2024, the PM_{2.5} annual mean concentration at the CM2 roadside measurement location was 8.5 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. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 introduce a target for national government of 10 µg/m³ as an annual mean, to be achieved by 2040. The Regulations also introduce a population exposure reduction target for national government; that there is at least a 35% reduction in population exposure by the end of 31st December 2040, as compared with the average

¹ Defra. Air Quality Strategy – Framework for Local Authority Delivery, August 2023

population exposure in the three-year period from 1st January 2016 to 31st December 2018.

DEFRA has brought forward the Environmental Improvement Plan 2023 for England, in order to achieve these targets. The Plan set interim targets that by January 2028: an annual average of 12 $\mu\text{g}/\text{m}^3$ for $\text{PM}_{2.5}$ is not exceeded at any monitoring station; and population exposure to $\text{PM}_{2.5}$ is at least 22 per cent less than in 2018. The $\text{PM}_{2.5}$ annual mean at CM2 in 2024, is already below the interim target.

Despite these being targets for central government, Exeter City Council still has a duty to reduce emissions of and exposure to this pollutant. The measures discussed above to reduce NO_2 emissions will also be effective in reducing many local $\text{PM}_{2.5}$ sources.

Approximately 60% of Exeter is designated as Smoke Control Areas. Controls on solid fuel combustion appliances and fuels are likely to have restricted $\text{PM}_{2.5}$ 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 2024 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 2020 and 2024 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 two sites during 2024. 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. The [Council website](#) 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 eighty-four sites during 2024, including one site with two co-located diffusion tubes alongside the continuous monitor at the RAMM museum (for determining the local bias adjustment factor).

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 or via the [Council website](#). 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 present the ratified and adjusted monitored NO₂ annual mean concentrations for the past five years. 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 2024 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.

The following changes were made to the monitoring network in 2024:

- Removal of the diffusion tube on Pinn Lane. The existing site at Pinhoe Station was considered more representative of worst case conditions along this road, making the Pinn Lane site redundant.
- Removal of the Northernhay Gardens diffusion tube. Data capture was historically very low here and as this was located in a city centre park some distance from relevant receptors it has not been replaced.
- Addition of two diffusion tubes close to the road junctions of Magdalen Street, Holloway Street, South Street and Western Way. Significant development, including changes to the road layout have been proposed in this area so additional monitoring would be beneficial (although not anticipating any exceedences of the objective would occur).

The national bias adjustment figure (0.84, from the April 2025 spreadsheet) has been used to adjust the diffusion tube data in this Annual Status Report because the data capture by the Exeter Roadside (CM1) continuous analyser was below 90%. Further information is available in Appendix C.

No sites measured an exceedence of the annual average objective in 2024. This is the first year when all measurements have been below the objective and marks a significant milestone in the continued improvement of the city's air quality.

East Wonford Hill (DT57) was the only site which was above the objective in 2023. In 2024 it was 1.9 µg/m³ below the objective of 40µg/m³. The general trend in the data for all monitoring sites is a significant fall between 2019 and 2020 with a partial rebound in 2021, and levels since then being roughly stable (see Figure A.1, and also refer to Table A.4 of this and the last year reports). This can be attributed to changes in traffic flows (see Table 3.1) as a result of COVID-19, its subsequent new travel & working behaviours, as well as ongoing improvements in vehicle emission technologies and the impact of measures in the Air Quality Action Plan. Some inter-annual variability is also expected as a result of road works, weather patterns etc.

Table 3.1 shows that work-day traffic flow data for 2020 and 2024 remain below 2015 levels, except for Heavitree Road, where traffic flows were 4% above 2015 levels in 2024. In 2020, reductions at all locations were significant, ranging from -15% to -26%.

Table 3.1 - Traffic Flow Data (24-hr average)

Site Name	2015	2020	2024	% change from 2015 to 2020	% change from 2015 to 2024
Pinhoe Road (Whipton)	20830	16538	18678	-21%	-10%
Heavitree Road	17507	14832	18248	-15%	4%
Honiton Road	26832	22789	26519	-15%	-1%
Topsham Road (King George)	26057	20702	24774	-21%	-5%
Alphington St	28799	22012	25558	-24%	-11%
Cowick St	14840	10913	11850	-26%	-20%
Total	134865	107786	125627	-20%	-7%

In September 2023 temporary changes were made to prohibit through traffic in the Heavitree residential area. In June 2024 the HaTOC committee voted to end the trial. This only affected part of the 2023 (September to December) and 2024 (January to July)

monitoring years so any changes in annual average traffic flows or nitrogen dioxide levels as a result would not be as significant as if the change had co-incided with the calendar year. The 2023 ASR found that no impact of the highway changes could be seen in the 2023 data set for the monitoring sites that would be expected to have been impacted (see Appendix H), and the same in 2024. There does not appear to be a different trend between the two sets of data which correspond to monitoring locations close to and distant from the Heavitree area. We believe other factors also influence pollution levels on a year-to-year basis, making it challenging to isolate the impact of the highway changes. This has been further detailed in Appendix H.

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. Data capture from the continuous analyser CM1 is low, because the operation of the equipment was affected for a proportion of the year by essential repairs to the roof of the building housing it (the RAMM museum). This means that the measured concentrations cannot be compared directly to the hourly objective. Instead the 99.8th percentile of hourly results is compared to the limit of 200 µg/m³. In 2024 the 99.8th percentile was 69.4 µg/m³ which indicates that concentrations are well below the objective. They were also similar to the previous year (a 99.8th percentile of 63.3 µg/m³).

The diffusion tube data show no locations measured an exceedance of the proxy for the hourly objective in 2024 (an annual average of 60 µg/m³).

It seems certain that previous exceedences of the objective at the Blackboy Road / Pinhoe Road junction (DT42 and DT43) have been permanently resolved given that they had fallen below 40 µg/m³ in 2018 and therefore have been below the objective for more than six years. Other sites (Alphington Street DT19, Livery Dole DT52, Satutory Mount DT54, Fore Street Heavitree inbound DT56 and Honiton Road DT58) were above the annual average objective in 2019 but have not been since then. This means that there have now been five years of results that are below the objective level, three of which were unaffected by COVID-19 and lockdowns. The only site where levels over the annual average objective have been measured in any of the last three years, prior to 2024, is East Wonford Hill (DT57) and results from this location exhibit a consistent downward trend.

The Council therefore intends to follow the approach in the statutory guidance and the last DEFRA Annual Status Report Appraisal Report (published in 2024); that is to amend the AQMA to reflect areas of compliance in 2022, 2023 and 2024. The proposal is to reduce the AQMA to just the East Wonford Hill area. Following the subsequent consultation and agreement of a new AQMA, a new AQAP will be produced focussing on the new AQMA

Date	Actions
June 2025	Submit ASR, announcing need for amendment of AQMA (with proposed new boundary) as well as timetable for consultation and publication of new AQAP
November Executive committee (date TBC)	ASR presented to committee for approval and start of consultation period on new AQMA order.
By end of January 2026	Consideration of consultation responses for AQMA order.
By end of February 2026	Final draft AQMA order submitted to DEFRA for approval
By end of April 2026	New AQMA order signed.
March / April 2026	Pre-Election period
June 2026	Provisional start of public consultation on draft AQAP following comments back from DEFRA. Consultation to last 10 weeks.
June 2026	Submit ASR with update on progress and timetable
September 2026 Executive committee (date TBC)	ASR presented to committee with consultation results of AQAP.

Following advice from DEFRA, the AQMA boundary can be reviewed this year because we now have at least three years of compliance post COVID. The drafting, consultation and adoption of a new AQAP has to take place within 18 months of the adoption of a new AQMA. The revised AQAP will be based upon the revised AQMA. Full public consultation will be undertaken as part of the production of the plan, so those affected will have the opportunity to comment on it.

The proposed new AQMA boundary and an explanation of how this has been derived is included in Appendix F.

Exeter City Council considers that the monitoring network in 2024 had a good coverage of all areas where exceedences might occur at a relevant location, as well as any areas which might be expected to see significant traffic growth (as a result of new developments, etc). Monitoring was focused at expected hotspots and relevant worst-case locations. No amendments to the existing network have taken place for 2024.

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.

Since August 2018, Exeter City Council has operated two continuous PM₁₀ analysers. However, faults with the equipment at CM1 (RAMM) mean that data from this site is not available for this reporting period. In 2024, the PM₁₀ annual mean concentration at the CM2 roadside measurement location was 14.1 µg/m³.

The annual average concentrations rose in 2022 and 2023 compared to the previous three years. The longer-term trend in annual concentrations as shown in Figure A.2 is a decline since 2005 or 2006. The data will be monitored over the coming years to identify whether this recent increase is part of an emerging trend or caused by expected inter-annual variability because of weather patterns etc.

There were no exceedances of an hourly mean of 50µg/m³ in 2024 for CM2 monitoring site.

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.

Since August 2018, Exeter City Council has operated two continuous PM_{2.5} analysers. However, the same faults with the equipment at CM1 as mentioned above mean that data from this site is not available for this reporting period. The measured annual mean in 2024 for CM2 was 8.5 µg/m³, which is well below the limit and the 2040 interim target. Trends in PM_{2.5} concentrations will continue to be monitored in coming years.

3.2.4 Ozone (O₃)

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

Ozone is not a local air pollutant, so Exeter City Council is not legally responsible for reporting or mitigating any exceedances of the above objective. This is the responsibility of DEFRA.

However, Exeter City Council has the facility to measure ozone levels. Figure A.4 presents the long-term ozone trends we measured. 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).

Because of the essential roof repairs at the RAMM museum, data capture at this site was low in 2024. We therefore have calculated the 95th percentile of the 8-hour running mean which is 69.6 µg/m³ and this is well below the objective of 100µg/m³.

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? ⁽¹⁾	Monitoring Technique	Distance to Relevant Exposure (m) ⁽²⁾	Distance to kerb of nearest road (m) ⁽¹⁾	Inlet Height (m)
CM1	Exeter Roadside	Kerbside	291939	92830	NO ₂ PM ₁₀ PM _{2.5} O ₃	YES	AQMA 1	Chemiluminescent; Optical Light Scattering; UVA	0	1	1.7
CM2	Alphington Street	Roadside	291670	91773	PM ₁₀ PM _{2.5}	YES	AQMA 1	Optical Light Scattering	12	3	1.7

Notes:

(1) N/A if not applicable

(2) 0m if the monitoring site is at a location of exposure (e.g. installed on the façade of a residential property).

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	NO ₂	YES, Exeter AQMA	50.0	0.5	No	2.0
DT2	Longbrook Street	Kerbside	292315	93016	NO ₂	NO	0.0	1.0	No	1.7
DT3	New North Road	Kerbside	292185	93049	NO ₂	YES, Exeter AQMA	0.0	1.0	No	2.0
DT4	Queen Street	Roadside	291779	93011	NO ₂	YES, Exeter AQMA	0.0	1.5	No	2.0
DT5, DT6	RAMM 2	Kerbside	291944	92826	NO ₂	YES, Exeter AQMA	0.0	1.0	Yes	1.7
DT7	High Street Guildhall	Roadside	291984	92626	NO ₂	YES, Exeter AQMA	0.0	2.0	No	2.0
DT8	North Street	Kerbside	291895	92569	NO ₂	YES, Exeter AQMA	0.0	1.0	No	1.7
DT9	South Street	Roadside	291943	92511	NO ₂	YES, Exeter AQMA	4.0	2.5	No	2.0
DT10	Market Street	Kerbside	291833	92433	NO ₂	YES, Exeter AQMA	0.0	1.0	No	1.7
DT11	Magdalen Street	Roadside	292291	92292	NO ₂	YES, Exeter AQMA	6.0	2.0	No	1.7
DT12	Magdalen Street façade	Kerbside	292422	92320	NO ₂	YES, Exeter AQMA	0.0	1.0	No	1.7
DT13	Archibald Road	Roadside	292590	92743	NO ₂	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	NO ₂	YES, Exeter AQMA	0.0	10.0	No	2.0
DT15	Heavitree Road outbound	Kerbside	292703	92807	NO ₂	YES, Exeter AQMA	0.0	1.0	No	1.7
DT16	Holloway Street	Kerbside	292378	92039	NO ₂	YES, Exeter AQMA	0.0	1.0	No	1.7
DT17	Carder's Court, Shilhay	Roadside	291699	92091	NO ₂	NO	0.0	15.0	No	1.7
DT18	Rear of Gervase Avenue	Roadside	291657	91973	NO ₂	YES, Exeter AQMA	5.0	18.0	No	2.0
DT19	Alphington Street	Kerbside	291669	91812	NO ₂	YES, Exeter AQMA	0.0	1.0	No	2.0
DT20	Alphington Road inbound	Roadside	291532	91349	NO ₂	YES, Exeter AQMA	0.0	2.0	No	1.7
DT21	Queen's Road	Urban Background	291460	91390	NO ₂	NO	8.0	2.0	No	1.7
DT22	Alphington Road outbound	Roadside	291509	91151	NO ₂	YES, Exeter AQMA	0.0	8.0	No	1.7
DT23	Alphington Road outer	Roadside	291518	90813	NO ₂	YES, Exeter AQMA	15.0	2.0	No	1.7
DT24	Church Road Alphington	Roadside	291691	90425	NO ₂	YES, Exeter AQMA	0.0	1.5	No	1.7
DT25	Church Road II	Kerbside	291767	90160	NO ₂	YES, Exeter AQMA	0.0	1.0	No	1.7
DT26	Alphington Cross	Roadside	291520	90531	NO ₂	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	NO ₂	YES, Exeter AQMA	0.0	1.0	No	1.7
DT28	Cowick Street (inbound)	Roadside	291249	91874	NO ₂	YES, Exeter AQMA	0.0	4.0	No	1.7
DT29	Cowick Street (outbound)	Roadside	291376	91944	NO ₂	YES, Exeter AQMA	0.0	1.5	No	1.7
DT30	Cowick Street (Exe Bridges)	Roadside	291500	92055	NO ₂	YES, Exeter AQMA	0.0	2.0	No	1.7
DT31	Okehampton Street	Roadside	291351	92169	NO ₂	YES, Exeter AQMA	0.0	4.0	No	1.7
DT32	Station Road	Roadside	290826	93598	NO ₂	NO	0.0	2.1	No	1.7
DT33	Bonhay Road (St Clements Lane)	Roadside	291253	93299	NO ₂	YES, Exeter AQMA	0.0	2.0	No	2.0
DT34	Red Cow Village	Kerbside	291242	93483	NO ₂	YES, Exeter AQMA	0.0	1.0	No	1.7
DT35	Red Cow II	Kerbside	291272	93468	NO ₂	YES, Exeter AQMA	0.0	1.0	No	1.7
DT36	Cowley Bridge Road	Roadside	291054	94399	NO ₂	YES, Exeter AQMA	0.0	4.0	No	1.7
DT37	Pennsylvania Road	Kerbside	292391	93291	NO ₂	NO	0.0	1.0	No	1.7
DT38	York Road School	Roadside	292469	93245	NO ₂	NO	3.5	2.5	No	1.7
DT39	York Road	Kerbside	292579	93146	NO ₂	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	NO ₂	NO	0.0	1.0	No	1.7
DT41	Pinhoe Road inbound	Roadside	293405	93395	NO ₂	YES, Exeter AQMA	0.0	3.0	No	1.7
DT42	Pinhoe Road (Polsloe Road)	Kerbside	293251	93375	NO ₂	YES, Exeter AQMA	0.0	1.0	No	1.7
DT43	Blackboy Road (Polsloe Road)	Roadside	293227	93356	NO ₂	YES, Exeter AQMA	0.0	2.0	No	1.7
DT44	Beacon Heath	Kerbside	295068	94487	NO ₂	NO	10.0	1.0	No	1.7
DT45	Venny Bridge	Kerbside	295888	94101	NO ₂	NO	8.0	1.0	No	1.7
DT46	Pinhoe	Kerbside	296418	94470	NO ₂	NO	20.0	0.1	No	1.7
DT47	Langaton Lane	Urban Background	296984	94327	NO ₂	NO	12.0	0.5	No	1.7
DT48 (Removed)	Pinn Lane	Roadside	296494	93782	NO ₂	NO	9.5	1.0	No	2.0
DT49	Pinhoe Road (Fairfield Avenue)	Roadside	295413	93689	NO ₂	YES, Exeter AQMA	0.0	5.0	No	1.7
DT50	East John Walk	Urban Background	293091	92825	NO ₂	NO	1.5	N/A	No	1.7
DT51	Magdalen Road (Barrack Road)	Kerbside	293448	92419	NO ₂	YES, Exeter AQMA	0.0	1.0	No	1.7
DT52	Livery Dole	Roadside	293418	92497	NO ₂	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	NO ₂	YES, Exeter AQMA	0.0	0.2	No	2.0
DT54	Salutary Mount	Roadside	293738	92396	NO ₂	YES, Exeter AQMA	4.5	1.5	No	1.7
DT55	Fore Street Heavitree outbound	Roadside	293781	92409	NO ₂	YES, Exeter AQMA	6.0	4.0	No	1.7
DT56	Fore Street Heavitree inbound	Roadside	294043	92359	NO ₂	YES, Exeter AQMA	0.0	2.0	No	1.7
DT57	East Wonford Hill	Roadside	294410	92310	NO ₂	YES, Exeter AQMA	0.0	2.0	No	1.7
DT58	Honiton Road	Roadside	295203	92378	NO ₂	YES, Exeter AQMA	20.0	1.5	No	2.0
DT59	Honiton Road façade	Roadside	295191	92395	NO ₂	NO	0.0	15.0	No	1.7
DT60	Sidmouth Road lamp post	Roadside	295466	92365	NO ₂	YES, Exeter AQMA	7.0	2.0	No	2.0
DT61	Sidmouth Road Middlemoor	Roadside	295636	92232	NO ₂	YES, Exeter AQMA	0.0	10.0	No	1.7
DT62	Newcourt Way	Roadside	295710	90571	NO ₂	NO	17.0	2.0	No	2.0
DT63	Topsham Road (Countess Wear)	Roadside	294694	90001	NO ₂	YES, Exeter AQMA	0.0	5.0	No	2.0
DT64	Bridge Road (Countess Wear)	Roadside	294652	89974	NO ₂	NO	0.0	15.0	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)
DT65	High Street Topsham	Kerbside	296415	88477	NO ₂	NO	0.0	1.0	No	1.7
DT66	Topsham Road (Tollards Road)	Roadside	294227	90435	NO ₂	YES, Exeter AQMA	0.0	1.5	No	1.7
DT67	Topsham Road (Barrack Road)	Roadside	293213	91245	NO ₂	YES, Exeter AQMA	0.0	10.0	No	1.7
DT68	Riverside Valley Park	Urban Background	292291	91678	NO ₂	NO	n/a	N/A	No	2.0
DT69	Cowick Barton Playing Fields	Urban Background	291016	91304	NO ₂	NO	n/a	N/A	No	1.7
DT70	Exwick Playing Fields	Urban Background	291298	92593	NO ₂	NO	n/a	N/A	No	2.0
DT71	Heavitree Pleasure Ground	Urban Background	294387	92611	NO ₂	NO	n/a	N/A	No	2.0
DT72	Ladysmith School/Pretoria Road	Roadside	293617	93090	NO ₂	NO	1.5	1.5	No	1.7
DT73	Pennsylvania	Urban Background	293052	94185	NO ₂	NO	6.0	2.0	No	2.0
DT74 (Removed)	Northernhay Gardens	Urban Background	292056	93043	NO ₂	NO	n/a	N/A	No	2.0
DT75	Chudleigh Road	Roadside	291721	89727	NO ₂	YES, Exeter AQMA	0.0	4.0	No	2.0
DT76	Mill Lane	Urban Background	291555	90449	NO ₂	NO	8.5	1.0	No	2.0
DT77	Sidwell Street	Kerbside	292553	93082	NO ₂	YES, Exeter AQMA	6.0	1.0	No	2.0

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)
DT78	Station Road Pinhoe	Other	296415	94165	NO ₂	NO	1.5	1.5	No	1.7
DT79	Tithebarn Link Road	Roadside	296827	93886	NO ₂	NO	2.0	2.0	No	2.0
DT80	Exeter Road	Roadside	295967	88876	NO ₂	NO	14.5	3.0	No	2.0
DT81	St. Leonards Road	Roadside	292637	91991	NO ₂	NO	0.0	2.0	No	1.7
DT82	Newtown	Urban Background	292847	92911	NO ₂	NO	0.0	3.5	No	2.0
DT83	New Bridge St	Roadside	291655	92258	NO ₂	YES, Exeter AQMA	0.0	2.0	No	2.0
DT84	Lower Coombe St	Roadside	291897	92217	NO ₂	NO	2.0	10.0	No	1.7
DT85	Bonhay Road bridge	Roadside	291375	92935	NO ₂	YES, Exeter AQMA	3.0	2.0	No	1.7
DT86 (new)	Western Way (Acorn)	Roadside	292281	92246	NO ₂	YES, Exeter AQMA	3.0	1.0	No	2.0
DT87 (new)	South Gate	Roadside	292206	92190	NO ₂	YES, Exeter AQMA	3.0	1.0	No	2.0

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 2024 (%) ⁽²⁾	2020	2021	2022	2023	2024
CM1	291939	92830	Kerbside	N/A	37.8	18.8	19.2	17.9	16.4	17.1

☒ Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22.

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

☒ Where exceedances of the NO₂ annual mean objective occur at locations not representative of relevant exposure, the fall-off with distance concentration has been calculated and reported concentration provided in brackets for 2024.

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.TG22 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%).

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 2024 (%) ⁽²⁾	2020	2021	2022	2023	2024
DT1	292199	92814	Kerbside	N/A	100.0	17.0	20.9	15.7	17.5	18.1
DT2	292315	93016	Kerbside	N/A	100.0	17.5	21.4	19.0	20.0	18.9
DT3	292185	93049	Kerbside	N/A	100.0	18.8	22.6	20.1	19.6	19.0
DT4	291779	93011	Roadside	N/A	92.5	16.2	19.0	16.6	17.4	16.1
DT5, DT6	291944	92826	Kerbside	N/A	100.0	18.5	21.3	17.8	17.3	17.9
DT7	291984	92626	Roadside	N/A	100.0	15.7	20.4	18.1	18.3	19.6
DT8	291895	92569	Kerbside	N/A	83.0	22.6	27.9	24.0	23.9	28.8
DT9	291943	92511	Roadside	N/A	90.6	18.7	24.2	20.6	20.2	20.5
DT10	291833	92433	Kerbside	N/A	100.0	18.6	23.4	20.7	20.1	19.7
DT11	292291	92292	Roadside	N/A	100.0	19.5	24.7	22.5	22.0	21.0
DT12	292422	92320	Kerbside	N/A	100.0	20.0	23.8	22.9	18.7	18.6

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 2024 (%) ⁽²⁾	2020	2021	2022	2023	2024
DT13	292590	92743	Roadside	N/A	92.5	13.2	16.8	15.2	15.7	14.3
DT14	292832	92731	Roadside	N/A	100.0	13.2	16.5	14.6	14.5	14.0
DT15	292703	92807	Kerbside	N/A	100.0	22.3	28.0	24.0	25.8	23.8
DT16	292378	92039	Kerbside	N/A	100.0	21.3	26.6	21.9	21.5	23.5
DT17	291699	92091	Roadside	N/A	90.6	15.5	18.3	15.7	15.9	16.1
DT18	291657	91973	Roadside	N/A	90.6	15.8	19.2	17.5	17.6	17.5
DT19	291669	91812	Kerbside	N/A	92.5	28.5	35.7	33.1	34.3	31.5
DT20	291532	91349	Roadside	N/A	100.0	22.4	27.4	24.3	24.5	23.6
DT21	291460	91390	Urban Background	N/A	90.6	9.1	11.7	10.1	9.9	9.7
DT22	291509	91151	Roadside	N/A	100.0	17.7	21.2	20.6	18.4	17.2
DT23	291518	90813	Roadside	N/A	100.0	15.3	20.6	18.7	18.1	16.5
DT24	291691	90425	Roadside	N/A	100.0	18.3	24.3	18.5	17.8	17.2
DT25	291767	90160	Kerbside	N/A	90.6	16.2	19.8	20.9	22.1	20.1

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 2024 (%) ⁽²⁾	2020	2021	2022	2023	2024
DT26	291520	90531	Roadside	N/A	90.6	20.4	25.6	22.5	23.8	22.9
DT27	290864	91725	Kerbside	N/A	100.0	26.8	31.6	30.1	31.2	29.9
DT28	291249	91874	Roadside	N/A	100.0	15.6	19.9	17.5	18.1	17.1
DT29	291376	91944	Roadside	N/A	100.0	24.3	29.8	28.7	29.2	28.1
DT30	291500	92055	Roadside	N/A	83.0	22.1	28.2	26.7	27.5	26.5
DT31	291351	92169	Roadside	N/A	100.0	17.3	20.6	18.7	19.0	18.6
DT32	290826	93598	Roadside	N/A	100.0	17.7	21.2	20.3	20.7	19.6
DT33	291253	93299	Roadside	N/A	90.6	19.2	24.7	21.8	22.6	22.8
DT34	291242	93483	Kerbside	N/A	100.0	26.5	32.1	29.7	31.7	27.1
DT35	291272	93468	Kerbside	N/A	100.0	21.5	26.0	23.1	24.2	23.1
DT36	291054	94399	Roadside	N/A	100.0	22.9	27.5	26.5	25.9	24.2
DT37	292391	93291	Kerbside	N/A	100.0	18.3	23.2	21.6	21.5	20.5
DT38	292469	93245	Roadside	N/A	100.0	18.1	23.0	20.7	20.3	19.0

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 2024 (%) ⁽²⁾	2020	2021	2022	2023	2024
DT39	292579	93146	Kerbside	N/A	100.0	23.3	31.2	27.8	26.9	25.2
DT40	293047	93877	Roadside	N/A	100.0	16.7	21.0	19.3	18.7	17.7
DT41	293405	93395	Roadside	N/A	100.0	20.9	24.0	22.3	23.5	22.3
DT42	293251	93375	Kerbside	N/A	100.0	25.6	30.6	28.0	29.6	28.6
DT43	293227	93356	Roadside	N/A	92.5	19.2	23.5	20.6	21.0	21.8
DT44	295068	94487	Kerbside	N/A	100.0	13.6	15.1	13.6	14.6	12.8
DT45	295888	94101	Kerbside	N/A	100.0	14.2	16.6	15.3	15.2	15.6
DT46	296418	94470	Kerbside	N/A	100.0	18.4	21.8	18.6	20.5	19.1
DT47	296984	94327	Urban Background	N/A	83.0	13.3	15.1	12.7	13.1	10.8
DT48 (Removed)	296494	93782	Roadside	N/A	0.0	12.8	15.5	14.3	16.2	-
DT49	295413	93689	Roadside	N/A	100.0	12.6	15.8	15.9	13.7	13.8
DT50	293091	92825	Urban Background	N/A	100.0	9.7	11.6	10.4	9.7	9.6
DT51	293448	92419	Kerbside	N/A	100.0	24.3	29.4	27.6	27.9	26.4

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 2024 (%) ⁽²⁾	2020	2021	2022	2023	2024
DT52	293418	92497	Roadside	N/A	100.0	31.1	34.9	32.3	34.7	32.0
DT53	293533	92473	Kerbside	N/A	100.0	27.4	32.1	27.2	28.6	27.1
DT54	293738	92396	Roadside	N/A	100.0	32.7	37.3	33.5	32.2	31.4
DT55	293781	92409	Roadside	N/A	100.0	19.8	23.4	20.7	20.9	19.9
DT56	294043	92359	Roadside	N/A	100.0	29.0	32.2	30.5	30.6	28.5
DT57	294410	92310	Roadside	N/A	100.0	38.2	42.2	40.4	40.5	38.1
DT58	295203	92378	Roadside	N/A	100.0	33.2	35.4	31.7	33.5	32.2
DT59	295191	92395	Roadside	N/A	100.0	14.8	16.0	14.9	14.9	13.7
DT60	295466	92365	Roadside	N/A	92.5	23.5	26.8	25.0	24.7	23.6
DT61	295636	92232	Roadside	N/A	100.0	15.5	19.2	17.5	17.5	16.6
DT62	295710	90571	Roadside	N/A	100.0	11.5	14.7	13.6	13.5	12.6
DT63	294694	90001	Roadside	N/A	100.0	18.1	20.7	17.4	19.1	17.7
DT64	294652	89974	Roadside	N/A	92.5	17.8	16.9	15.6	15.0	13.8

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 2024 (%) ⁽²⁾	2020	2021	2022	2023	2024
DT65	296415	88477	Kerbside	N/A	100.0	17.2	22.1	18.7	18.7	17.7
DT66	294227	90435	Roadside	N/A	100.0	25.0	30.0	27.9	28.8	27.5
DT67	293213	91245	Roadside	N/A	100.0	15.9	19.1	19.2	18.3	17.2
DT68	292291	91678	Urban Background	N/A	90.6	9.4	11.7	9.9	10.3	10.1
DT69	291016	91304	Urban Background	N/A	75.0	7.6	9.3	8.9	8.3	7.2
DT70	291298	92593	Urban Background	N/A	90.6	12.3	15.9	13.9	12.7	15.1
DT71	294387	92611	Urban Background	N/A	100.0	7.6	9.1	8.7	7.8	7.2
DT72	293617	93090	Roadside	N/A	100.0	10.6	12.2	10.5	10.9	9.7
DT73	293052	94185	Urban Background	N/A	90.6	7.5	8.3	7.8	7.6	7.2
DT74 (Removed)	292056	93043	Urban Background	N/A	0.0	8.3	10.7	8.4	9.4	-
DT75	291721	89727	Roadside	N/A	90.6	11.1	13.7	12.6	12.3	12.1
DT76	291555	90449	Urban Background	N/A	90.6	9.6	12.3	11.3	11.5	11.0
DT77	292553	93082	Kerbside	N/A	92.5	18.6	23.8	20.5	21.6	22.5

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 2024 (%) ⁽²⁾	2020	2021	2022	2023	2024
DT78	296415	94165	Other	N/A	100.0	10.6	13.4	12.5	13.5	12.1
DT79	296827	93886	Roadside	N/A	100.0	14.5	17.3	15.4	15.8	15.2
DT80	295967	88876	Roadside	N/A	100.0	14.3	16.4	16.6	16.6	15.2
DT81	292637	91991	Roadside	N/A	100.0	11.2	13.9	12.2	11.9	11.1
DT82	292847	92911	Urban Background	N/A	100.0	10.8	12.6	12.0	11.9	11.3
DT83	291655	92258	Roadside	N/A	92.5	19.5	24.0	22.5	22.7	21.8
DT84	291897	92217	Roadside	N/A	100.0	15.5	18.6	15.4	16.5	17.0
DT85	291375	92935	Roadside	N/A	100.0	-	-	26.9	27.1	26.6
DT86 (new)	292281	92246	Roadside	N/A	100.0	-	-	-	-	28.0
DT87 (new)	292206	92190	Roadside	N/A	100.0	-	-	-	-	22.4

☒ Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22.

☒ 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**.

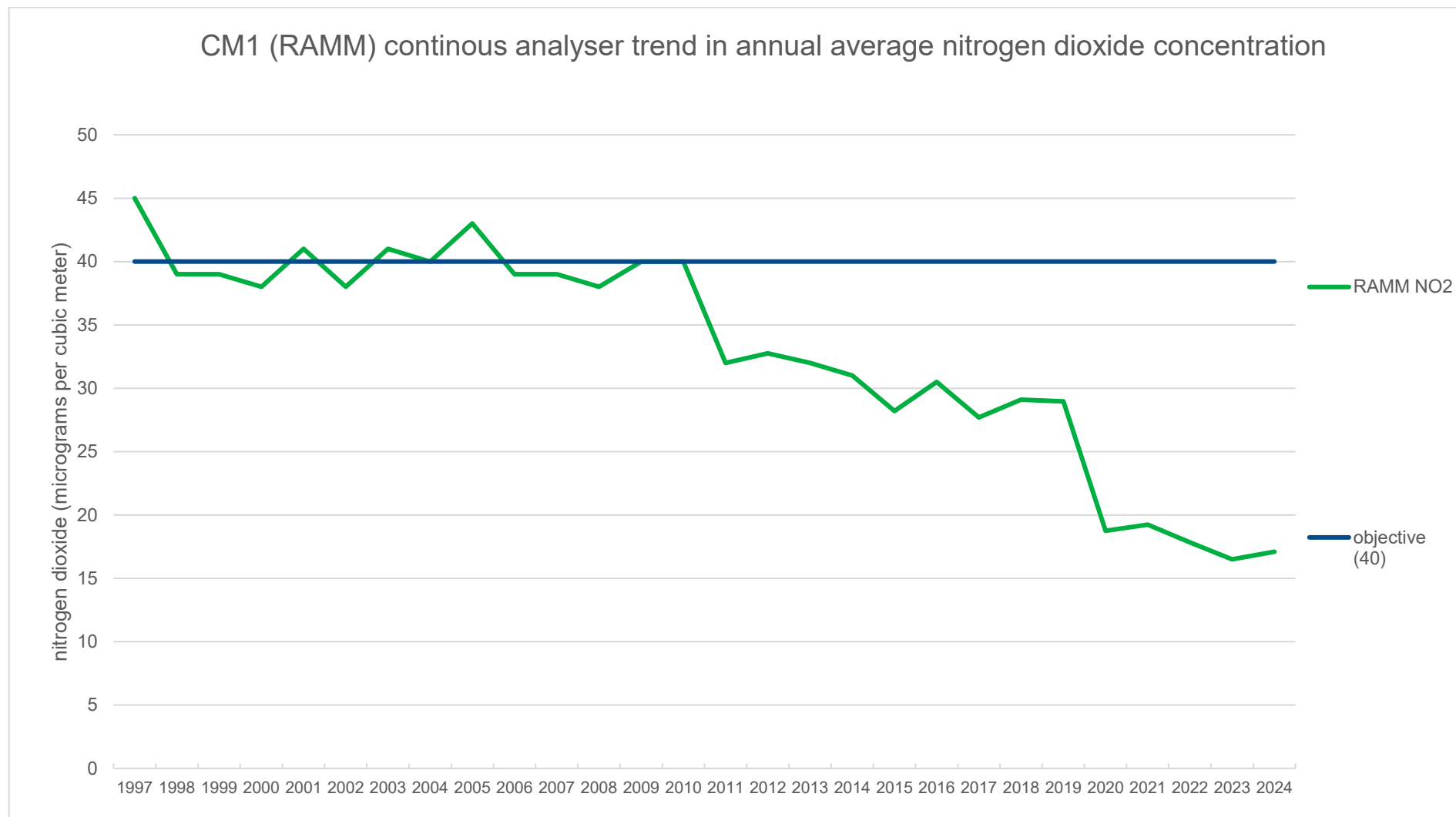
NO_2 annual means exceeding $60\mu\text{g}/\text{m}^3$, indicating a potential exceedance of the NO_2 1-hour mean objective are shown in **bold and underlined**.

Means for diffusion tubes have been corrected for bias. All means have been “annualised” as per LAQM.TG22 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.

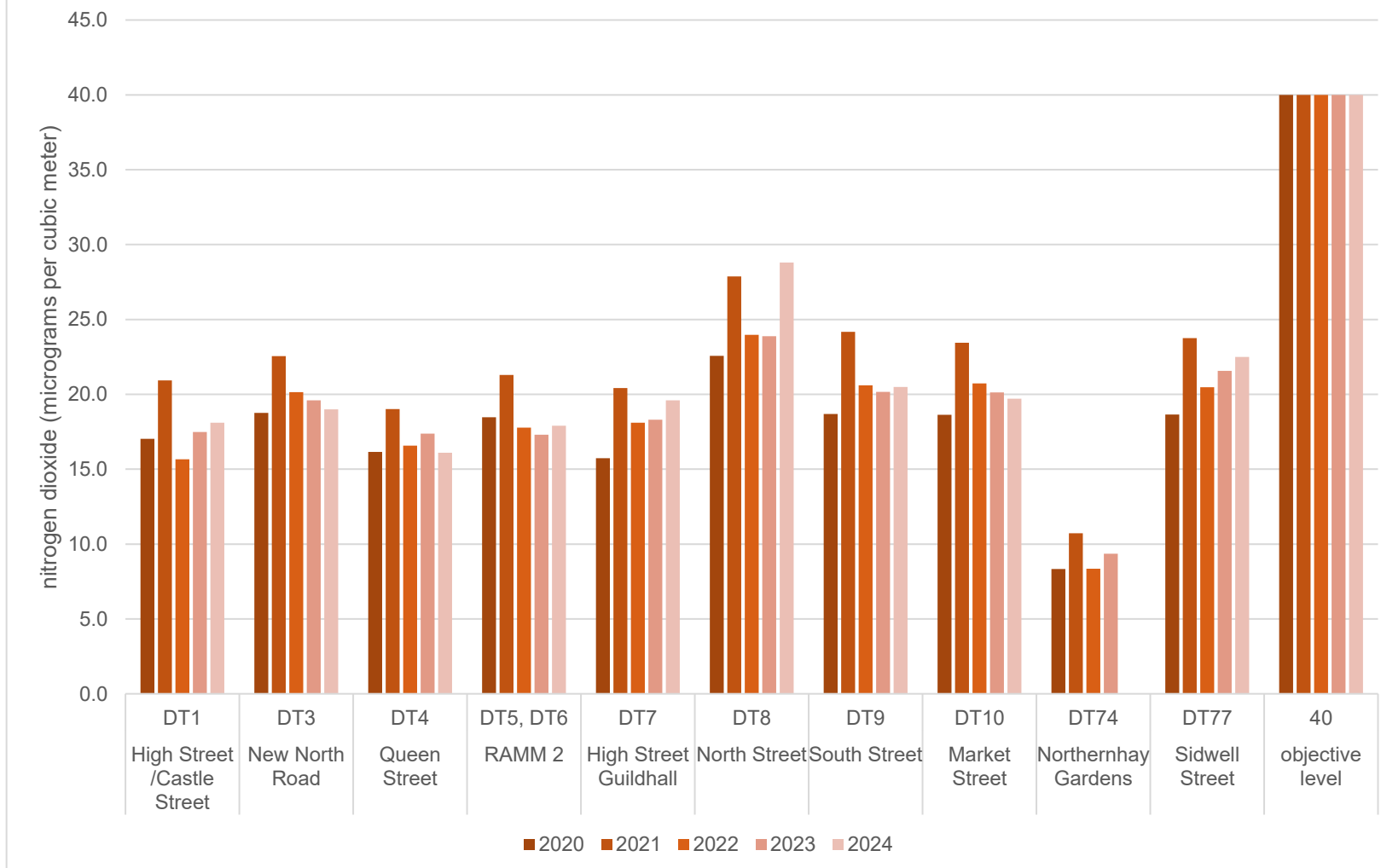
(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(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%).

Figure A.1 – Trends in Annual Mean NO₂ Concentrations

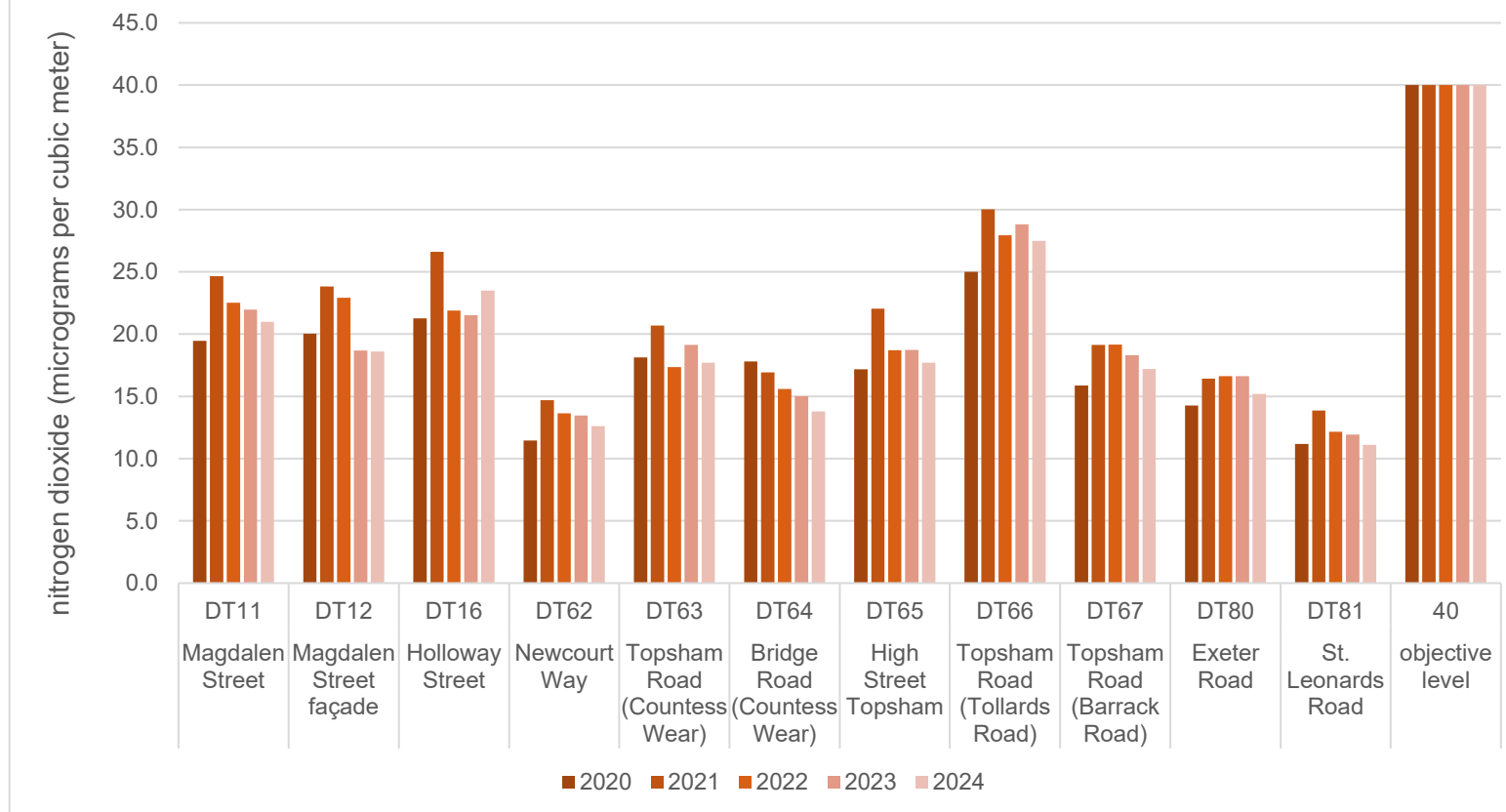
This figure presents NO₂ annual mean concentrations at the RAMM continuous monitoring site between years 1997 and 2024. There are no exceedances of the annual mean objective in 2024. There is a general trend of reduction since 2010.

Five Year Trend in Annual Average Nitrogen Dioxide Concentrations at Diffusion Tube Monitoring Sites in City Centre Area

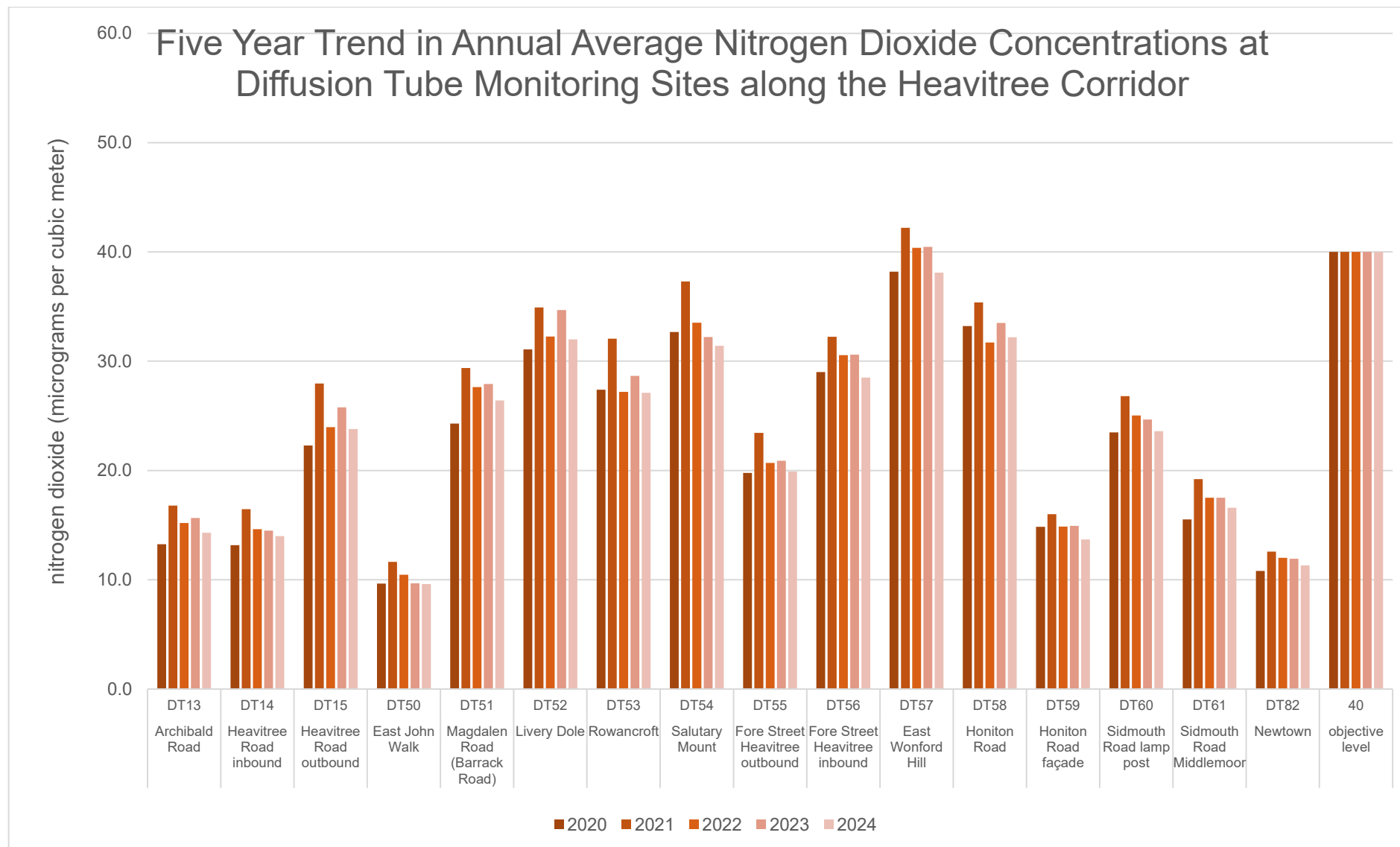


This figure presents NO₂ annual mean concentrations for sites in the city centre between 2020 and 2024. There are no exceedances of the annual mean objective in 2024 and there is a general trend of reduction experienced across the sites.

Five Year Trend in Annual Average Nitrogen Dioxide Concentrations at Diffusion Tube Monitoring Sites along the Topsham Road Corridor

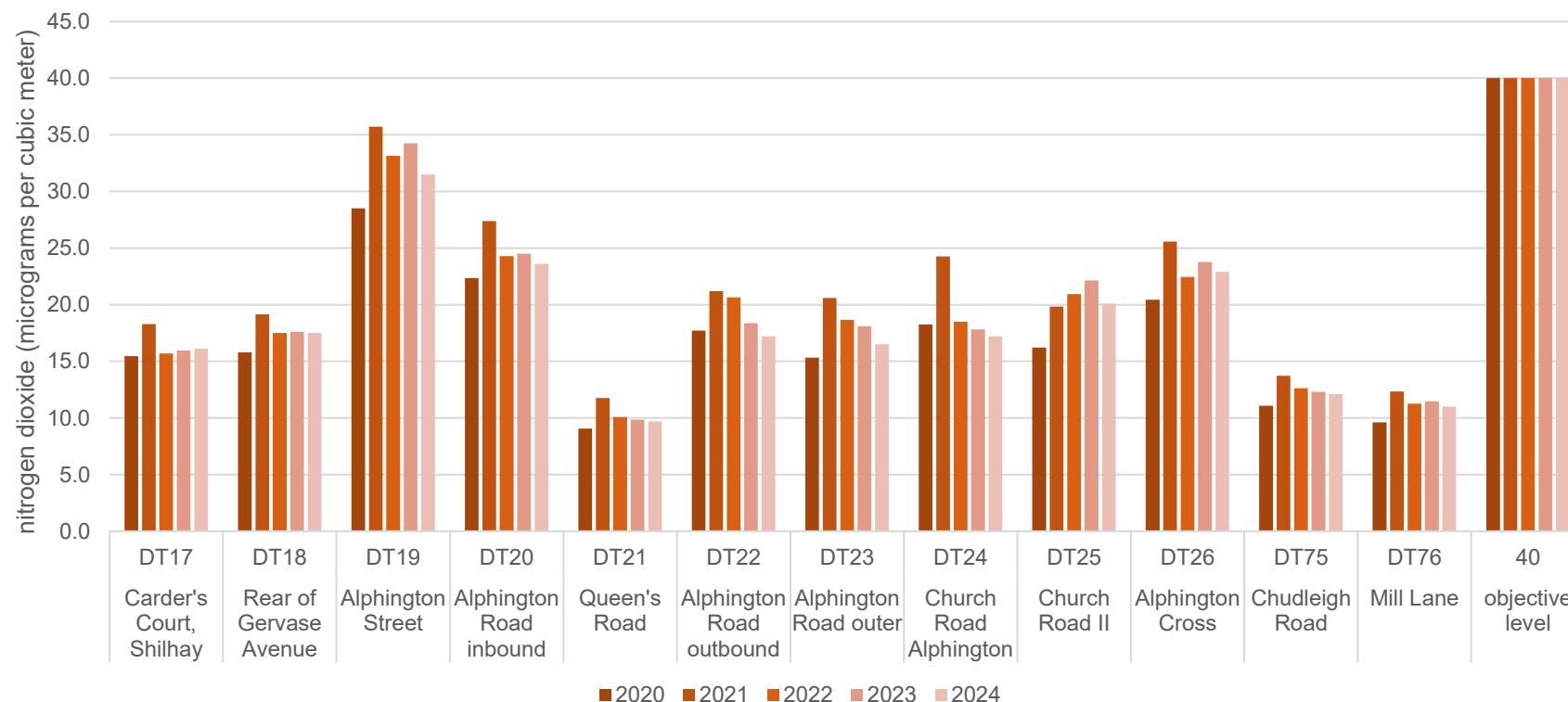


This figure presents NO₂ annual mean concentrations for sites along the Topsham Road corridor between 2020 and 2024. There are no exceedances of the annual mean objective in 2024 and there is a general trend of reduction experienced across the sites.



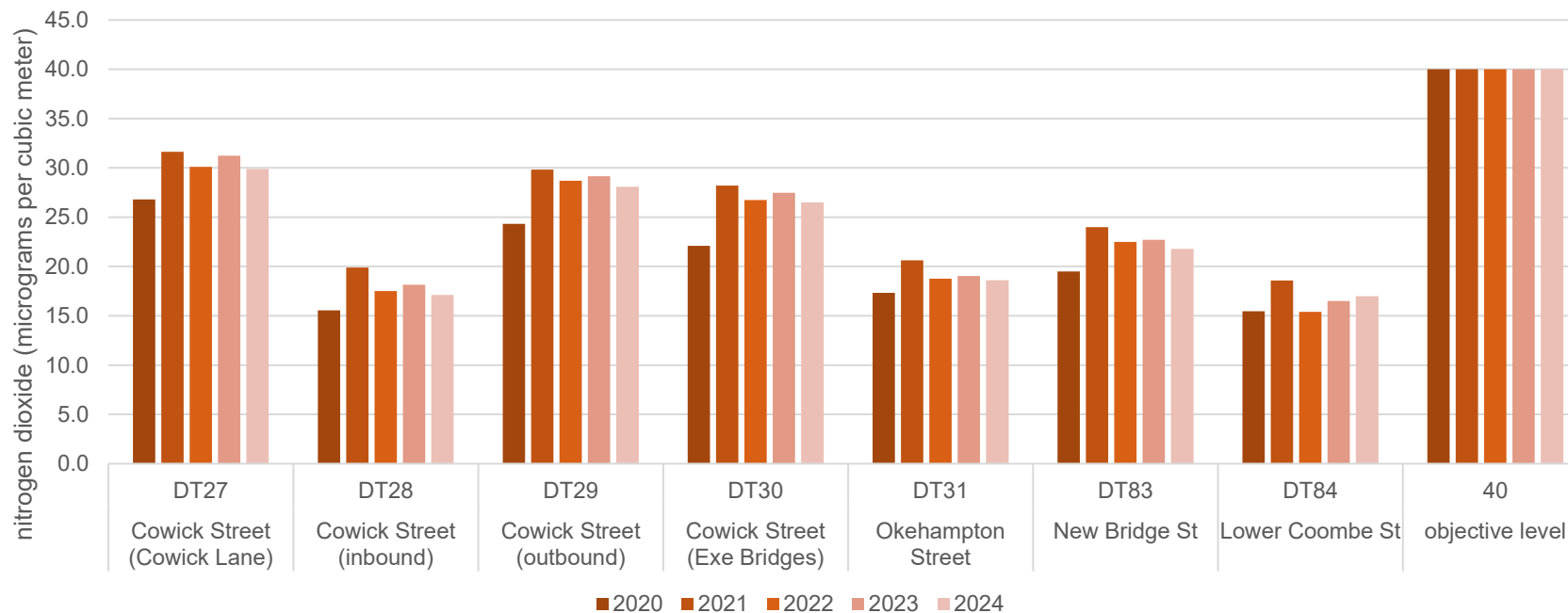
This figure presents NO₂ annual mean concentrations for sites along the Heavitree corridor between 2020 and 2024. There are no exceedances of the annual mean objective in 2024 and there is a general trend of reduction across the sites.

Five Year Trend in Annual Average Nitrogen Dioxide Concentrations at Diffusion Tube Monitoring Sites along the Alphington Corridor

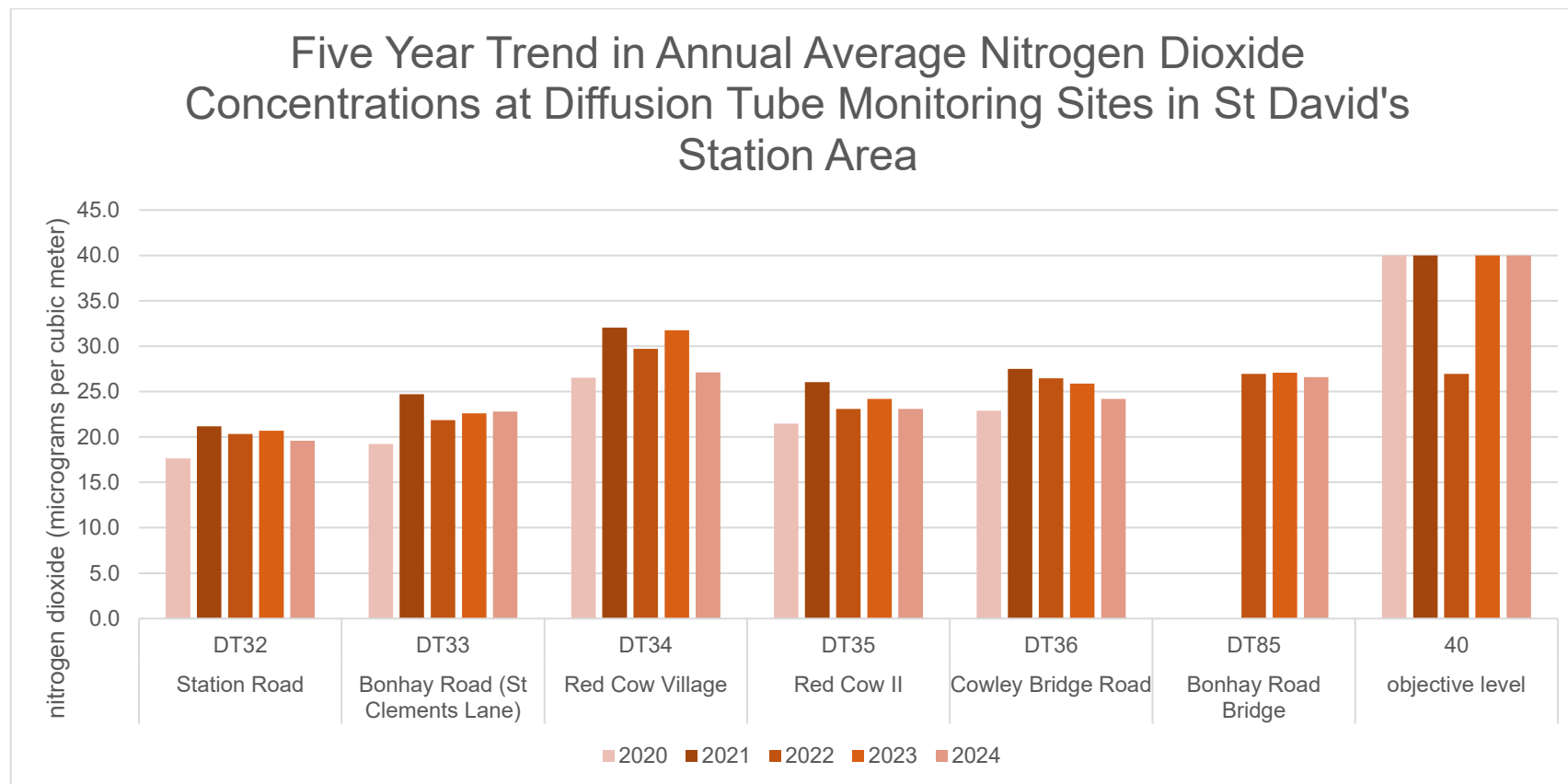


This figure presents NO₂ annual mean concentrations for sites along the Alphington corridor between 2020 and 2024. There are no exceedances of the annual mean objective in 2024 and there is a general trend of reduction experienced across the sites.

Five Year Trend in Annual Average Nitrogen Dioxide Concentrations at Diffusion Tube Monitoring Sites along the Cowick Street Corridor

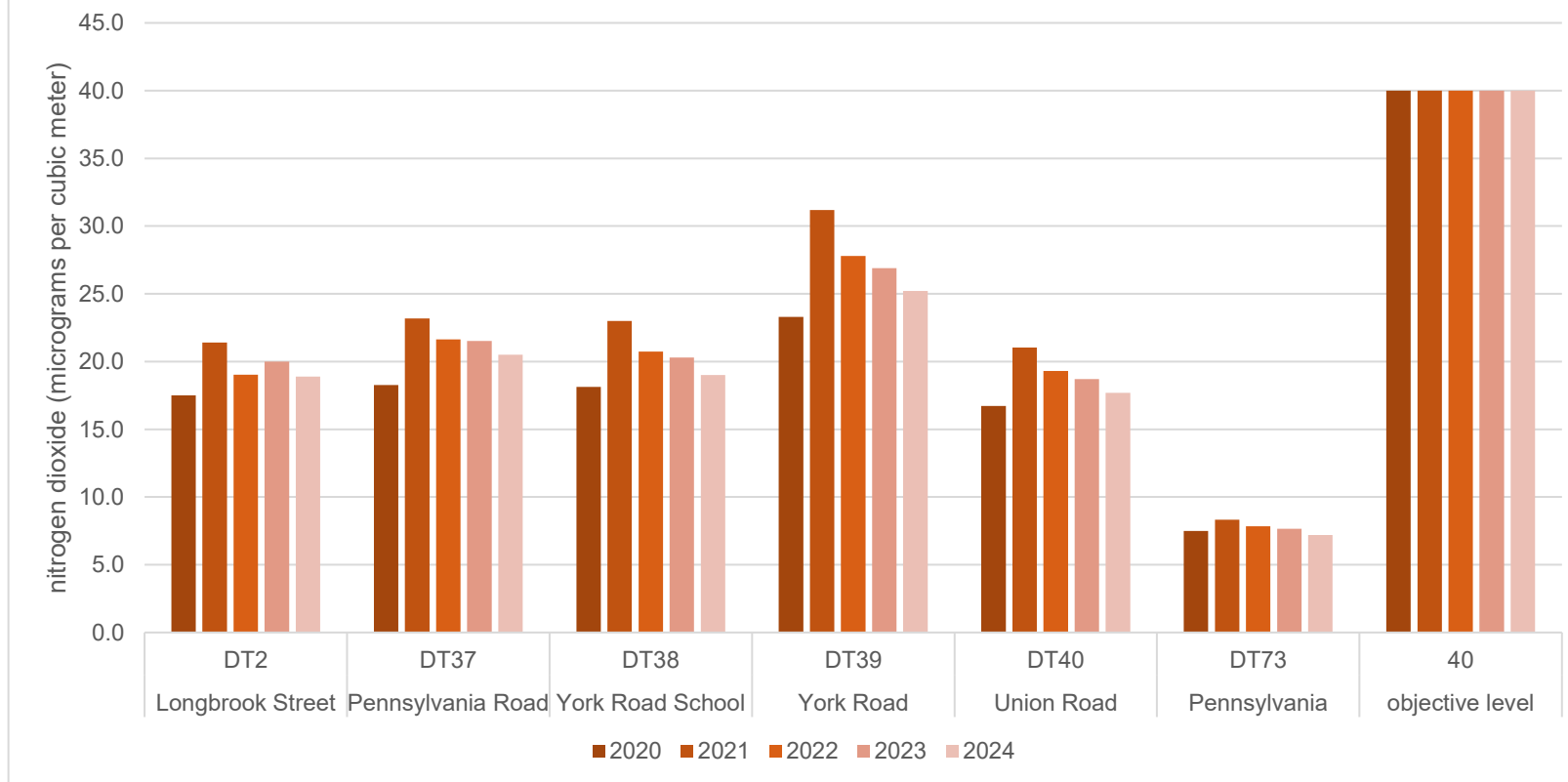


This figure presents NO₂ annual mean concentrations for sites along the Cowick Street corridor between 2020 and 2024. There are no exceedances of the annual mean objective in 2024 and there is a general trend of reduction experienced across the sites.

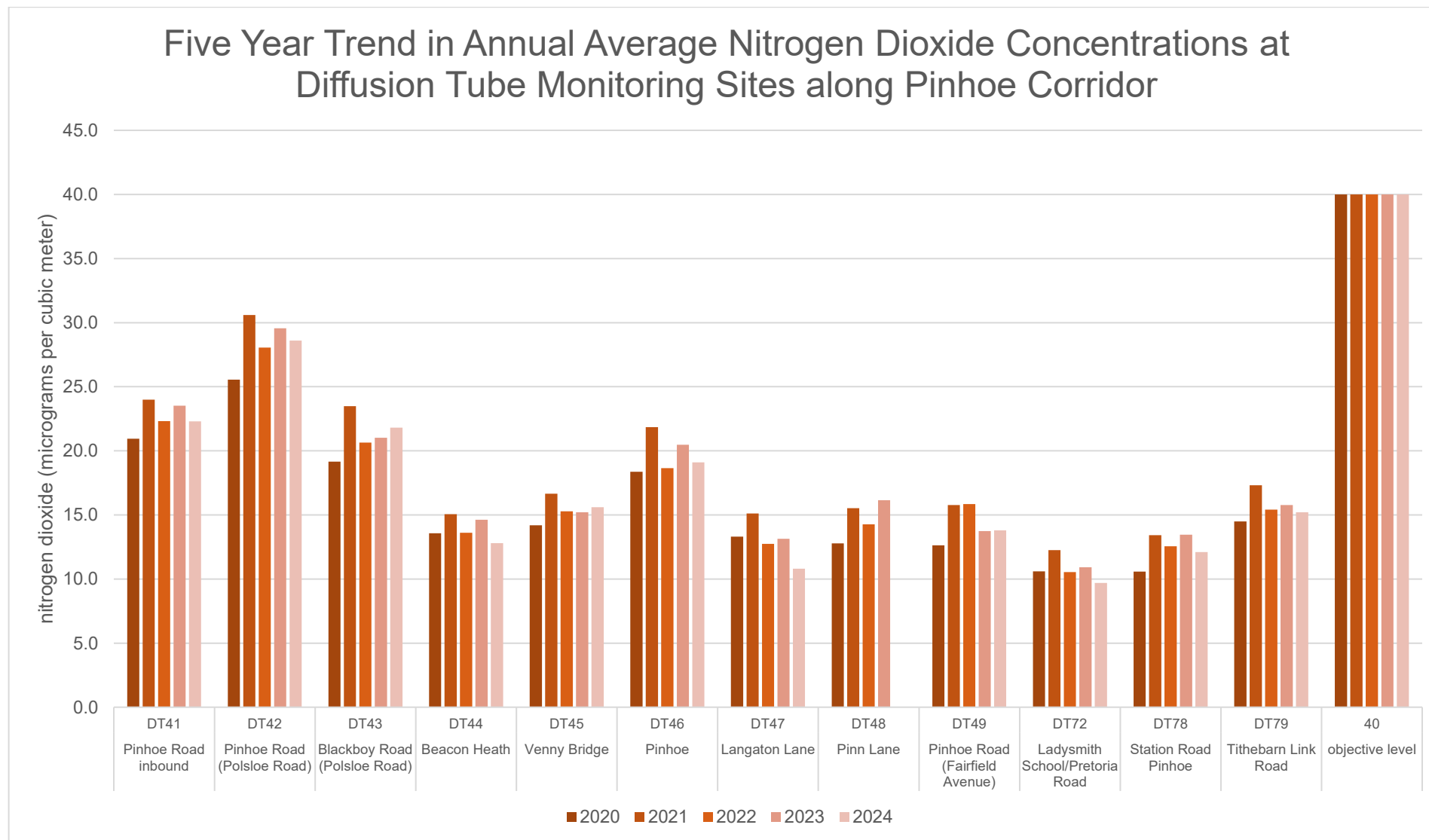


This figure presents NO₂ annual mean concentrations for sites in the St David's area between 2020 and 2024. There are no exceedances of the annual mean objective in 2024 and there is a general trend of reduction experienced across the sites.

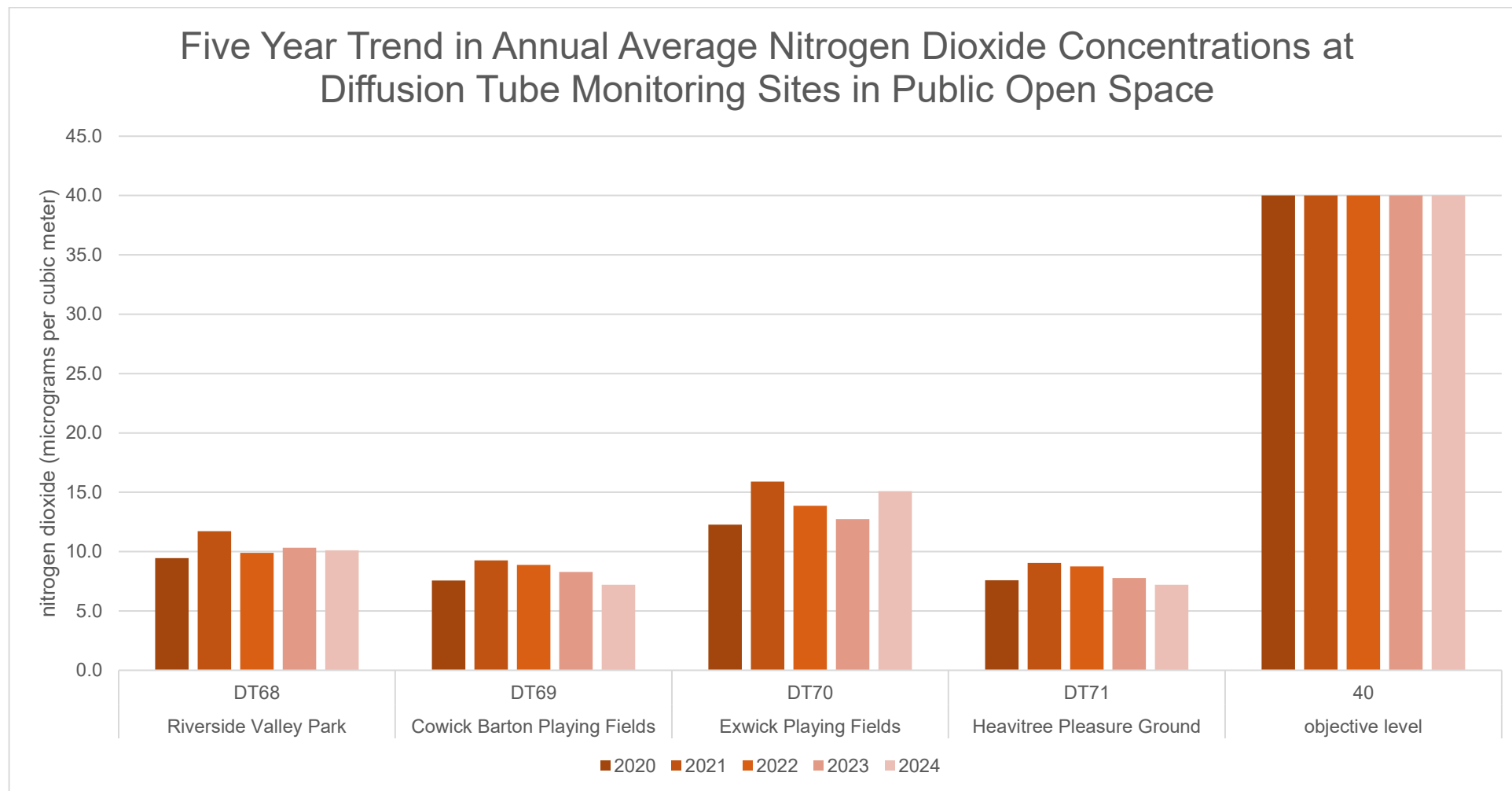
Five Year Trend in Annual Average Nitrogen Dioxide Concentrations at Diffusion Tube Monitoring Sites along Pennsylvania Corridor



This figure presents NO₂ annual mean concentrations for sites in the Pennsylvania area between 2020 and 2024. There are no exceedances of the annual mean objective in 2024 and there is a general trend of reduction experienced across the sites.



This figure presents NO₂ annual mean concentrations for sites along the Pinhoe corridor between 2020 and 2024. There are no exceedances of the annual mean objective in 2024 and there is a general trend of reduction experienced across the sites.



This figure presents NO₂ annual mean concentrations for sites in public open space between 2020 and 2024. There are no exceedances of the annual mean objective in 2024 and there is a general trend of reduction experienced across the sites.

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 2024 (%) ⁽²⁾	2020	2021	2022	2023	2024
CM1	291939	92830	Kerbside	N/A	38	0	0	0	0 (63.3)	0 (69.4)

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%).

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 2024 (%) ⁽²⁾	2020	2021	2022	2023	2024
CM1	291939	92830	Kerbside	N/A	0	14.1	13.9	17.1 (19.2)	18.8 (20.1)	-
CM2	291670	91773	Roadside	N/A	100	11.5	12.0	14.7	15.2	14.1

☒ **Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22.**

Notes:

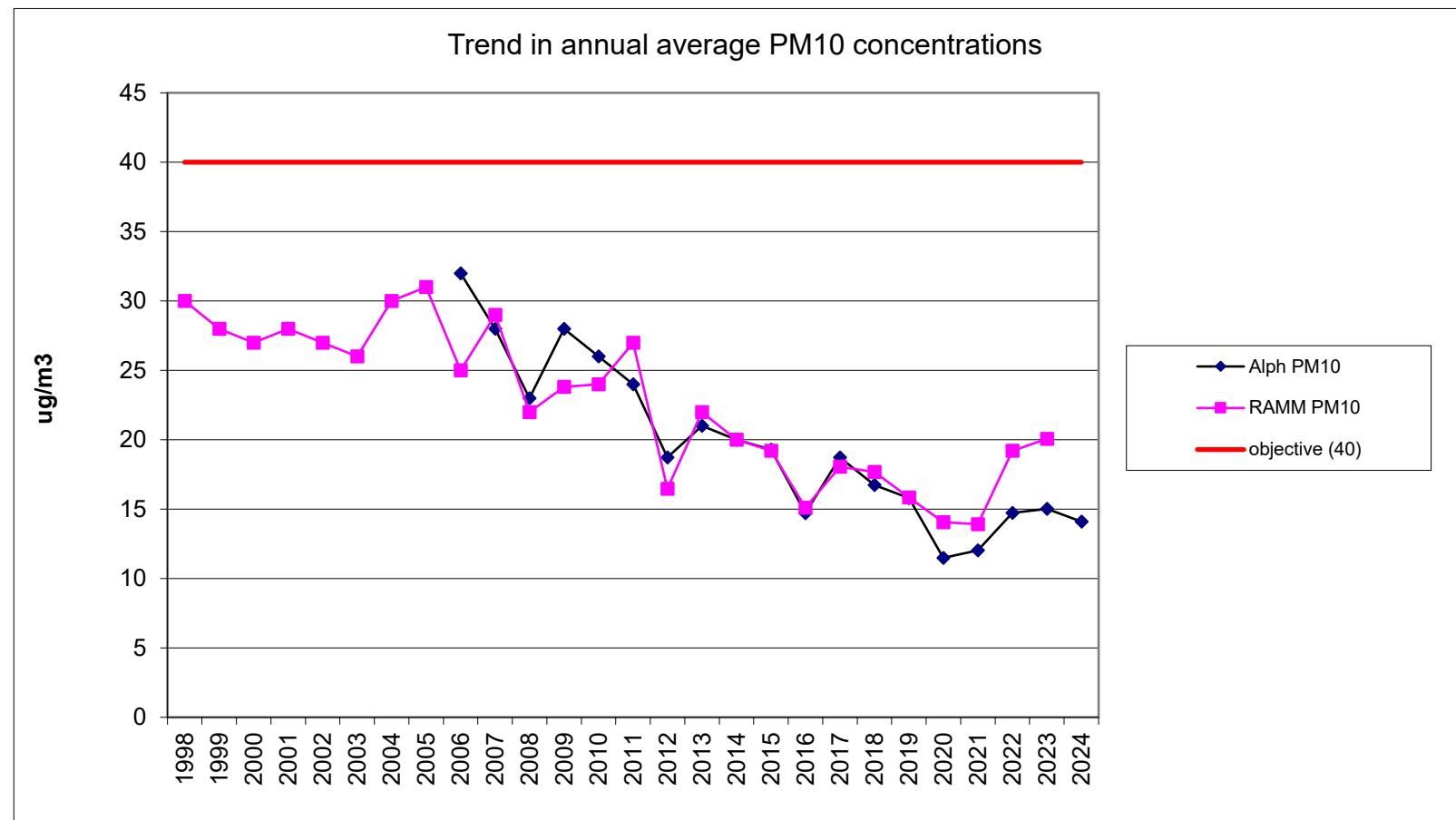
The annual mean concentrations are presented as µg/m³.

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

All means have been “annualised” as per LAQM.TG22 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%).

Figure A.2 – Trends in Annual Mean PM₁₀ Concentrations

This figure presents PM₁₀ annual mean concentrations for the two monitoring sites in Exeter between 1998 and 2024. There are no exceedances of the annual mean objective in 2024 although concentrations have increased since 2021. Otherwise, there is a general trend of reduction experienced across both sites.

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 2024 (%) ⁽²⁾	2020	2021	2022	2023	2024
CM1	291939	92830	Kerbside	N/A	0	1	1	2 (29.9)	0 (30.3)	-
CM2	291670	91773	Roadside	N/A	100	0 (19.2)	0	1	0	0

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%).

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 2024 (%) ⁽²⁾	2020	2021	2022	2023	2024
CM1	291939	92830	Kerbside	N/A	0	8.6	8.4	11.1 (12.7)	13.2	-
CM2	291670	91773	Roadside	N/A	100	6.8	7.5	9.0	8.8	8.5

☒ **Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22.**

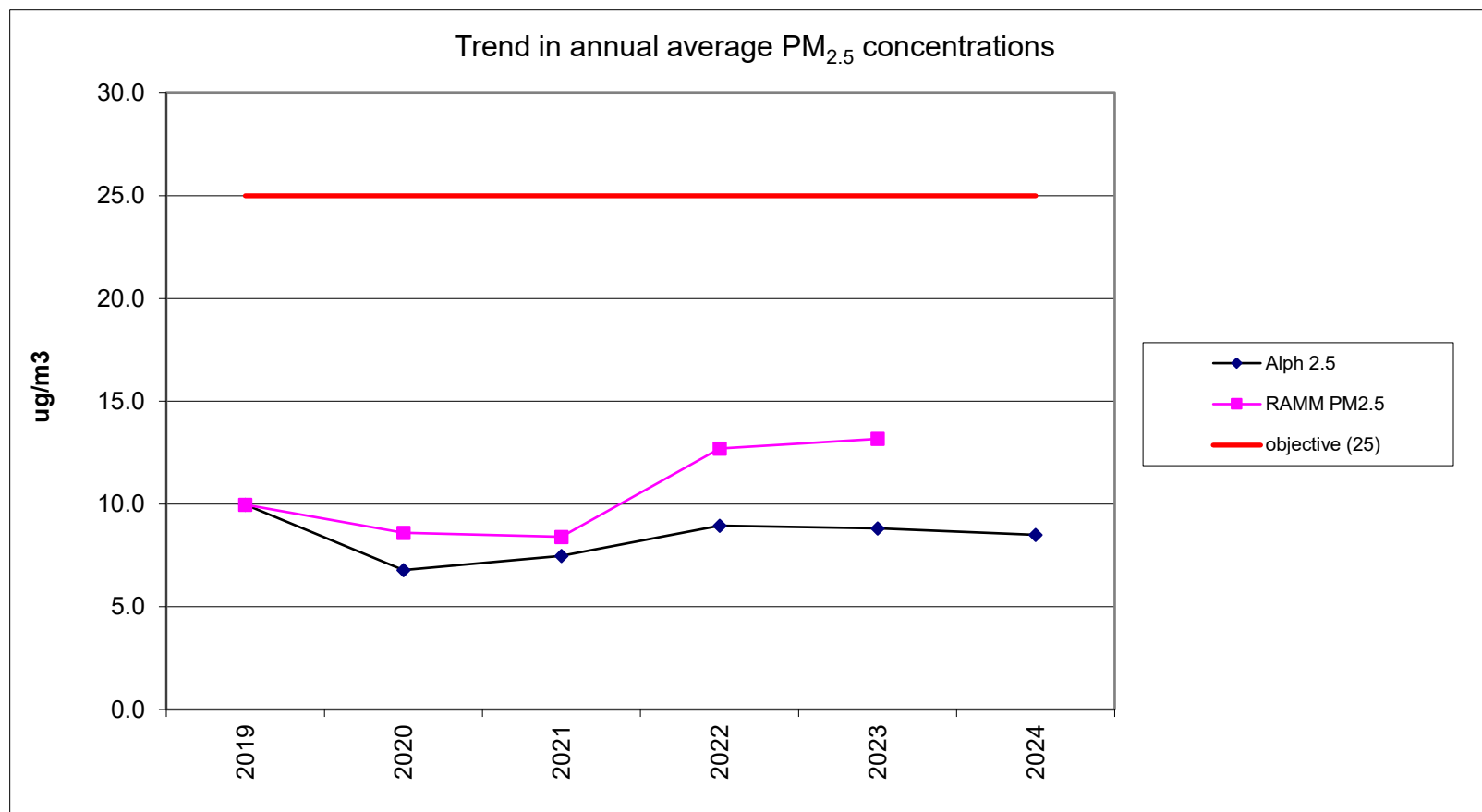
Notes:

The annual mean concentrations are presented as µg/m³.

All means have been “annualised” as per LAQM.TG22 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%).

Figure A.3 – Trends in Annual Mean PM_{2.5} Concentrations

This figure presents PM_{2.5} annual mean concentrations for the two monitoring sites in Exeter between 2019 and 2023. There are no exceedances of the annual mean objective in 2024 although concentrations have increased since 2021. There is no clear trend over a five-year period.

Table A.9 – O₃ Monitoring Results, Number of 8-Hour Means > 100µg/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 2024 (%) ⁽²⁾	2020	2021	2022	2023	2024
CM1	291939	92830	Kerbside	N/A	38	87	0	0	8 (74.6)	0 (69.5)

Notes:

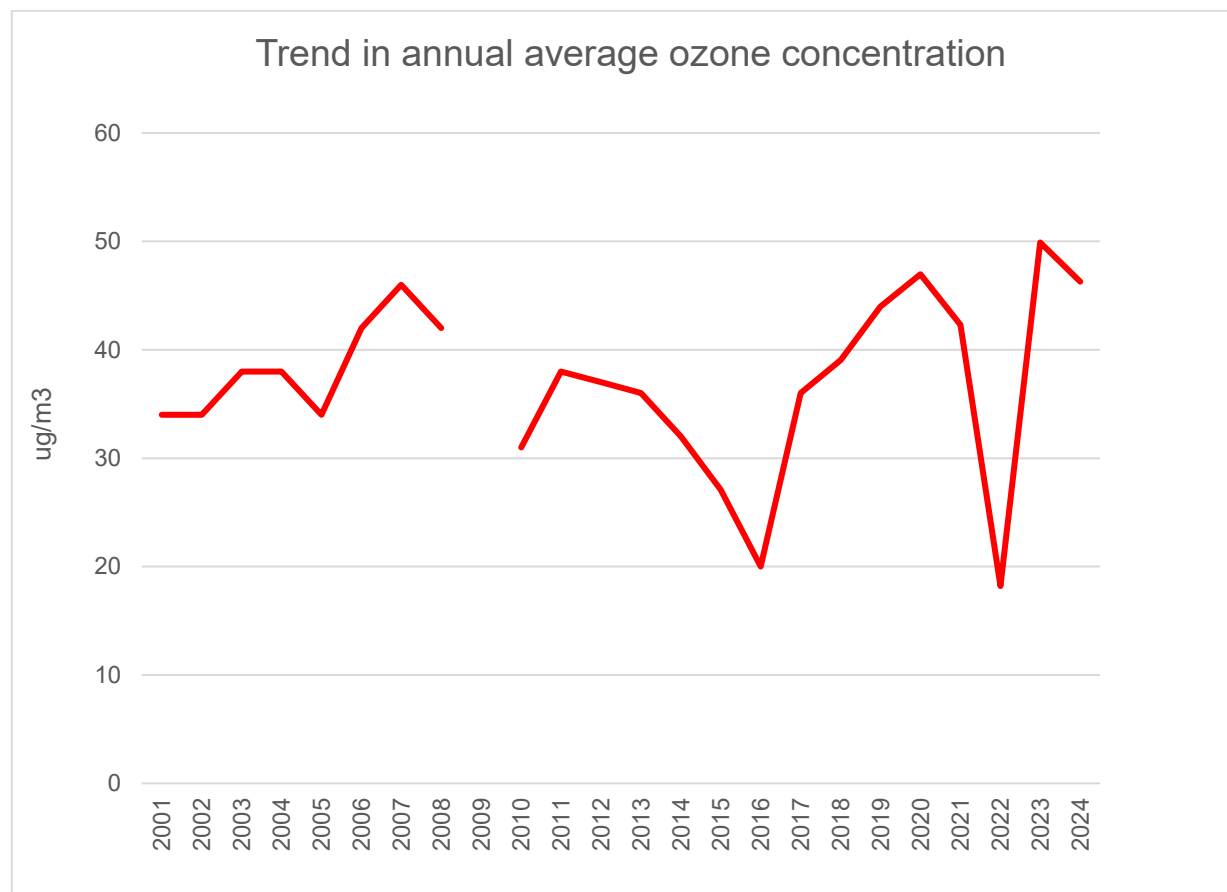
Results are presented as the number of instances where monitored concentrations are greater than the objective concentration.

Exceedances of the 8-hour mean O₃ objective (100µg/m³ not to be exceeded more than 10 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the relevant percentiles are 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%).

Figure A.4 – Trends in Annual Mean O₃ Concentrations

This figure presents O₃ annual mean concentrations between years 2001 and 2024. (Note that there is no local air quality objective for annual mean O₃ concentrations so this data is presented for information only). There is no clear trend over the entire period.

Appendix B: Full Monthly Diffusion Tube Results for 2024

Table B. 1 - NO₂ 2024 Diffusion Tube Results (µg/m³)

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.84)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT1	292199	92814	26.5	24.2	23.1	19.5	20.5	17.8	18.6	17.6	21.5	24.2	24.6	21.1	21.6	18.1	-	
DT2	292315	93016	25.9	28.9	22.1	19.9	21.3	17.6	19.7	17.3	19.7	25.2	28.2	24.0	22.5	18.9	-	
DT3	292185	93049	26.2	26.8	26.6	21.9	20.2	19.2	19.3	22.1	17.9	22.6	25.8	22.6	22.6	19.0	-	
DT4	291779	93011	24.9	23.1	20.4	17.2	17.5	13.8		13.9	16.8	23.7	21.0	18.3	19.2	16.1	-	
DT5	291944	92826	27.9	23.9	19.6	19.7	19.7	17.1	15.3		24.0	24.5	27.0	23.6	-	-	-	Duplicate Site with DT5 and DT6 - Annual data provided for DT6 only
DT6	291944	92826	26.8	23.6	20.2	18.8	19.7	17.6	15.5	14.0	24.9	25.2	27.7	21.8	21.3	17.9	-	Duplicate Site with DT5 and DT6 - Annual data provided for DT6 only
DT7	291984	92626	28.5	26.7	26.8	23.1	20.9	17.8	21.1	19.3	20.4	29.6	24.0	21.6	23.3	19.6	-	
DT8	291895	92569	36.0	38.3	35.1	35.6		33.1	31.5	31.2	33.4	37.0		32.1	34.3	28.8	-	
DT9	291943	92511	27.4	28.0	23.0	23.0	21.2	20.5	22.0	20.2	27.7		29.5	26.0	24.4	20.5	-	
DT10	291833	92433	27.9	27.4	25.8	20.2	19.3	16.3	19.7	17.5	22.8	31.1	30.0	23.8	23.5	19.7	-	
DT11	292291	92292	30.3	29.7	25.1	20.9	21.9	17.4	20.8	19.7	27.4	28.9	32.0	26.2	25.0	21.0	-	
DT12	292422	92320	33.6	31.1	9.8	20.4	13.6	19.0	16.0	18.4	27.1	26.1	26.0	24.5	22.1	18.6	-	
DT13	292590	92743	24.0	21.8	17.1	14.6	13.6	10.2	11.4	11.6		21.6	23.4	17.7	17.0	14.3	-	
DT14	292832	92731	24.4	19.8	16.9	15.0	14.2	11.4	12.6	11.3	15.8	19.9	22.4	16.7	16.7	14.0	-	
DT15	292703	92807	34.3	31.7	26.7	27.9	30.1	23.6	22.3	21.6	30.9	32.7	32.3	26.7	28.4	23.8	-	
DT16	292378	92039	31.1	27.7	24.7	22.6	26.5	23.3	23.5	20.5	32.2	33.2	40.8	29.7	28.0	23.5	-	
DT17	291699	92091	25.5	23.9	16.0	16.2	15.6	16.0	15.7		19.1	20.9	23.1	18.9	19.2	16.1	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.84)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT18	291657	91973	26.6	26.7	18.8	19.7	19.0	17.0	17.4		19.6	21.5	22.5	20.3	20.8	17.5	-	
DT19	291669	91812	47.0	38.7	39.5	38.5	38.2	32.1	32.8	29.8		41.7	39.3	34.4	37.5	31.5	-	
DT20	291532	91349	34.2	31.2	26.5	27.9	25.1	25.0	24.5	24.1	31.4	28.0	31.8	26.7	28.0	23.6	-	
DT21	291460	91390	18.4	12.2	9.9	9.0	8.4	6.2	7.6		10.9	14.8	17.4	12.0	11.5	9.7	-	
DT22	291509	91151	28.9	24.0	25.0	20.2	23.3	17.1	19.3	16.7	15.7	9.5	24.0	21.4	20.4	17.2	-	
DT23	291518	90813	26.9	22.3	25.0	19.8	16.7	12.2	14.9	14.5	15.7	25.5	25.6	16.6	19.6	16.5	-	
DT24	291691	90425	28.3	23.3	21.2	16.8	18.4	18.8	18.3	14.8	18.8	24.6	21.4	20.9	20.5	17.2	-	
DT25	291767	90160	29.6	30.2	26.9	22.4	21.9	19.0	22.7		20.7	19.7	25.1	24.4	23.9	20.1	-	
DT26	291520	90531	32.0	31.8	28.7	25.5	23.5	24.0	26.4		26.4	26.4	28.7	26.7	27.3	22.9	-	
DT27	290864	91725	39.1	38.4	44.8	36.7	36.1	29.7	32.7	31.1	31.6	39.3	36.5	31.2	35.6	29.9	-	
DT28	291249	91874	28.3	23.3	19.1	18.4	17.7	15.5	16.2	15.5	21.7	25.5	25.2	18.6	20.4	17.1	-	
DT29	291376	91944	38.5	35.8	38.4	34.2	32.9	27.5	30.7	29.4	32.7	41.5	32.7	27.8	33.5	28.1	-	
DT30	291500	92055	36.9	33.3	30.2	29.3			30.0	28.1	35.3	30.9	31.5	29.9	31.5	26.5	-	
DT31	291351	92169	24.7	26.5	23.2	19.5	22.3	18.7	20.1	18.7	25.9	25.1	25.2	16.3	22.2	18.6	-	
DT32	290826	93598	28.5	25.7	23.8	19.9	23.8	18.6	20.3	19.2	21.7	27.8	28.5	22.1	23.3	19.6	-	
DT33	291253	93299	34.3	31.1	23.7	24.2	23.5	23.0	23.0		30.3	28.5	31.1	26.4	27.2	22.8	-	
DT34	291242	93483	39.7	33.1	25.3	24.1	32.1	29.7	31.9	31.8	35.6	34.6	35.1	34.0	32.2	27.1	-	
DT35	291272	93468	32.9	31.5	34.3	23.3	24.0	23.9	21.8	24.4	25.6	29.1	31.6	26.9	27.4	23.1	-	
DT36	291054	94399	35.8	32.0	32.1	28.3	29.1	22.6	24.5	22.3	29.1	32.4	30.7	27.1	28.8	24.2	-	
DT37	292391	93291	29.6	28.0	27.5	20.8	24.0	18.0	21.2	17.7	25.3	31.3	26.7	22.4	24.4	20.5	-	
DT38	292469	93245	30.6	26.3	25.2	21.1	21.1	16.2	17.7	16.2	21.9	26.2	28.2	21.1	22.7	19.0	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.84)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT39	292579	93146	37.1	33.3	32.7	29.7	28.4	23.2	24.3	21.5	31.0	34.5	35.5	28.5	30.0	25.2	-	
DT40	293047	93877	26.5	25.7	23.8	17.3	20.3	14.5	17.9	14.1	17.8	29.0	24.9	20.5	21.0	17.7	-	
DT41	293405	93395	28.8	31.9	32.7	21.8	24.6	19.3	24.5	22.2	22.8	32.8	31.1	25.6	26.5	22.3	-	
DT42	293251	93375	36.9	37.4	37.0	33.0	34.9	26.1	31.5	28.5	28.7	43.5	38.1	32.6	34.0	28.6	-	
DT43	293227	93356	28.9	29.4	22.9	22.8	22.1	19.5		23.6	27.6	30.0	31.8	26.3	25.9	21.8	-	
DT44	295068	94487	17.7	22.3	15.6	13.4	14.1	11.4	11.4	9.0	14.5	17.6	20.2	15.2	15.2	12.8	-	
DT45	295888	94101	23.0	23.8	18.2	16.7	16.3	15.7	15.6	15.4	16.3	21.7	21.7	18.9	18.6	15.6	-	
DT46	296418	94470	28.8	30.4	22.3	20.6	18.9	20.1	18.7	19.6	22.2	23.8	25.0	23.0	22.8	19.1	-	
DT47	296984	94327		16.6	14.5	11.8	12.0	9.3	12.1	10.2	12.3		17.0	13.0	12.9	10.8	-	
DT49	295413	93689	25.5	18.7	14.3	13.3	13.1	10.9	12.1	11.3	16.2	19.5	22.7	19.7	16.4	13.8	-	
DT50	293091	92825	17.7	15.7	11.9	9.3	9.0	7.0	8.3	7.2	10.1	14.7	14.8	11.9	11.5	9.6	-	
DT51	293448	92419	42.8	37.5	34.8	30.7	28.1	23.0	25.1	20.4	32.2	32.0	36.0	35.4	31.5	26.4	-	
DT52	293418	92497	47.0	44.7	44.8	36.3	33.4	32.0	33.5	33.3	37.7	35.9	38.8	39.0	38.0	32.0	-	
DT53	293533	92473	40.4	36.6	35.7	31.4	28.7	26.1	26.9	24.5	32.7	36.2	35.1	33.0	32.3	27.1	-	
DT54	293738	92396	41.0	44.6	45.0	37.6	35.7	32.3	35.1	33.9	32.8	35.5	39.6	35.7	37.4	31.4	-	
DT55	293781	92409	30.6	28.4	24.6	23.2	19.7	17.6	19.5	16.5	23.0	26.8	28.8	25.2	23.7	19.9	-	
DT56	294043	92359	37.1	43.3	41.5	30.5	31.2	26.4	33.9	31.4	27.6	35.8	36.4	32.5	34.0	28.5	-	
DT57	294410	92310	48.5	55.2	46.3	41.5	46.6	40.3	46.6	41.9	40.8	48.4	45.4	42.5	45.4	38.1	-	
DT58	295203	92378	48.8	43.6	38.4	36.6	36.2	33.6	34.3	33.7	39.0	38.5	43.4	34.5	38.4	32.2	-	
DT59	295191	92395	22.5	21.5	16.8	14.3	14.7	11.0	11.5	11.5	15.6	18.9	22.3	15.2	16.3	13.7	-	
DT60	295466	92365	37.8	31.4	25.0	24.0	26.0	19.5		20.1	29.5	30.5	36.1	29.2	28.1	23.6	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.84)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT61	295636	92232	24.7	23.2	18.3	15.7	17.9	14.7	16.6	15.5	18.0	24.0	22.2	26.6	19.8	16.6	-	
DT62	295710	90571	23.8	17.6	12.4	11.6	12.6	10.1	11.9	10.9	15.6	16.3	21.3	15.3	15.0	12.6	-	
DT63	294694	90001	26.0	25.5	18.5	17.4	20.0	17.6	19.9	19.9	21.7	21.1	25.4	20.6	21.1	17.7	-	
DT64	294652	89974		19.9	14.5	14.6	14.8	12.7	13.6	13.3	19.8	18.6	21.7	17.2	16.4	13.8	-	
DT65	296415	88477	27.9	22.2	19.9	19.5	21.2	16.4	18.1	16.0	22.2	23.1	27.4	18.4	21.0	17.7	-	
DT66	294227	90435	38.1	37.8	35.8	31.6	31.9	25.6	30.7	29.5	31.5	35.2	35.0	30.5	32.8	27.5	-	
DT67	293213	91245	27.9	23.2	24.3	17.9	20.7	13.7	17.6	14.3	17.2	25.5	23.2	19.7	20.4	17.2	-	
DT68	292291	91678	18.2	14.7	10.7	9.5	8.8	6.9	8.2		9.9	17.5	14.9	13.2	12.1	10.1	-	
DT69	291016	91304	15.7	10.7	8.3	6.7	6.4	5.0	6.2		9.0			9.6	8.6	7.2	-	
DT70	291298	92593	25.4	19.8	15.7	15.7	15.9	12.4	13.9		18.4	22.8	22.6	14.7	17.9	15.1	-	
DT71	294387	92611	13.5	11.5	8.9	6.5	6.0	4.5	5.9	5.1	6.7	10.8	13.0	10.2	8.6	7.2	-	
DT72	293617	93090	17.7	14.9	11.4	9.0	8.0	6.8	8.1	7.0	10.9	14.5	17.5	12.8	11.5	9.7	-	
DT73	293052	94185	13.2	10.6	9.4	6.3	6.3	4.5	5.8		5.8	11.2	12.5	9.1	8.6	7.2	-	
DT75	291721	89727	21.5	15.8	13.9	11.4	11.0	7.9	10.9		13.9	16.9	20.8	13.8	14.4	12.1	-	
DT76	291555	90449	20.1	15.0	11.6	10.5	10.5	8.5	9.2		12.4	14.9	17.5	14.4	13.1	11.0	-	
DT77	292553	93082	33.2	29.4	28.3	25.8	24.8	22.4	23.2	21.8		28.3	30.3	27.1	26.8	22.5	-	
DT78	296415	94165	19.1	18.3	14.4	11.7	12.8	10.3	12.5	10.8	13.4	17.5	18.1	14.3	14.4	12.1	-	
DT79	296827	93886	26.1	20.5	17.1	14.3	14.6	10.9	14.3	13.2	20.0	22.7	24.4	18.5	18.0	15.2	-	
DT80	295967	88876	26.2	21.4	16.5	16.2	16.2	13.7	15.3	12.7	17.5	19.3	23.7	18.9	18.1	15.2	-	
DT81	292637	91991	20.5	16.2	11.5	10.6	10.2	7.1	10.0	8.9	12.6	16.7	19.5	14.5	13.2	11.1	-	
DT82	292847	92911	19.5	19.2	14.5	11.7	10.8	8.1	10.2	8.5	10.9	14.8	17.5	15.9	13.5	11.3	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.84)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT83	291655	92258	32.6	31.4	25.1	24.1	22.6	24.4	22.7	22.4		28.1	29.4	23.3	26.0	21.8	-	
DT84	291897	92217	29.4	24.2	15.6	18.2	16.5	15.3	16.0	15.1	24.5	22.1	24.1	21.4	20.2	17.0	-	
DT85	291375	92935	40.3	37.8	26.8	28.5	31.3	27.4	27.2	26.0	32.7	35.0	33.4	33.7	31.7	26.6	-	
DT86	292281	92246	38.0	36.9	32.9	32.3	31.1	27.2	30.1	28.2	35.2	37.7	35.7	33.9	33.3	28.0	-	
DT87	292206	92190	32.5	34.1	29.6	27.0	17.0	21.9	23.5	21.9	26.3	30.2	31.2	24.2	26.6	22.4	-	

- ☒ 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.TG22.
- ☐ 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 2024 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 During 2024

The Council has not identified any new sources relating to air quality within the reporting year of 2024.

Additional Air Quality Works Undertaken by Exeter City Council During 2024

Potential effects of the Heavitree and Whipton Active Streets trial during 2024 on the local nitrogen dioxide concentrations and traffic flows have been assessed, using the same approach as in Annual Status Report 2024. See Appendices G, H and I for further information.

Exeter City Council in partnership with Emerald Green Power (EGP) have been working on a DEFRA-funded virtual sensor project. The project has been progressing according to the approved plan. Key milestones achieved include the installation of all required IoT air quality sensors, the development of advanced virtual sensing algorithms using historic and AURN data as training data and the creation of an offline rapid prototype model. For more information about the project, please visit [this link](#).

QA/QC of Diffusion Tube Monitoring

Exeter City Council uses Gradko diffusion tubes (20% TEA in water). Gradko laboratories (GRADKO International Ltd., St. Martins House, 77 Wales Street, Winchester, Hants. SO23 0RH) 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 Diffusion Tube Monitoring Calendar 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 2024, the monitoring was completed in adherence with the 2024 Diffusion Tube Monitoring 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 colocated 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 recorded data capture of 75% therefore it was not required to annualise any monitoring data. In addition, any sites with a data capture below 25% do not require annualisation.

Diffusion Tube Bias Adjustment Factors

The diffusion tube data presented within this Annual Status Report 2025 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.TG22 provides guidance regarding 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 national bias adjustment factor of 0.84 to the 2024 monitoring data, from the National Diffusion Tube Bias Adjustment Factor Spreadsheet version number 04/25, based on 27 studies. A summary of bias adjustment factors used by Exeter City Council over the past five years is presented in Table C.1.

Table C. 1 - Bias Adjustment Factor

Monitoring Year	Local or National	If National, Version of National Spreadsheet	Adjustment Factor
2024	National	04/25	0.84
2023	National	03/24	0.81
2022	Local	-	0.77
2021	National	03/22	0.84
2020	Local	-	0.74

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. ET also service each analyser every six months. Faults with the equipment mean that data from CM1 (RAMM) is not available for this reporting period.

Live PM₁₀ and PM_{2.5} data are 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:

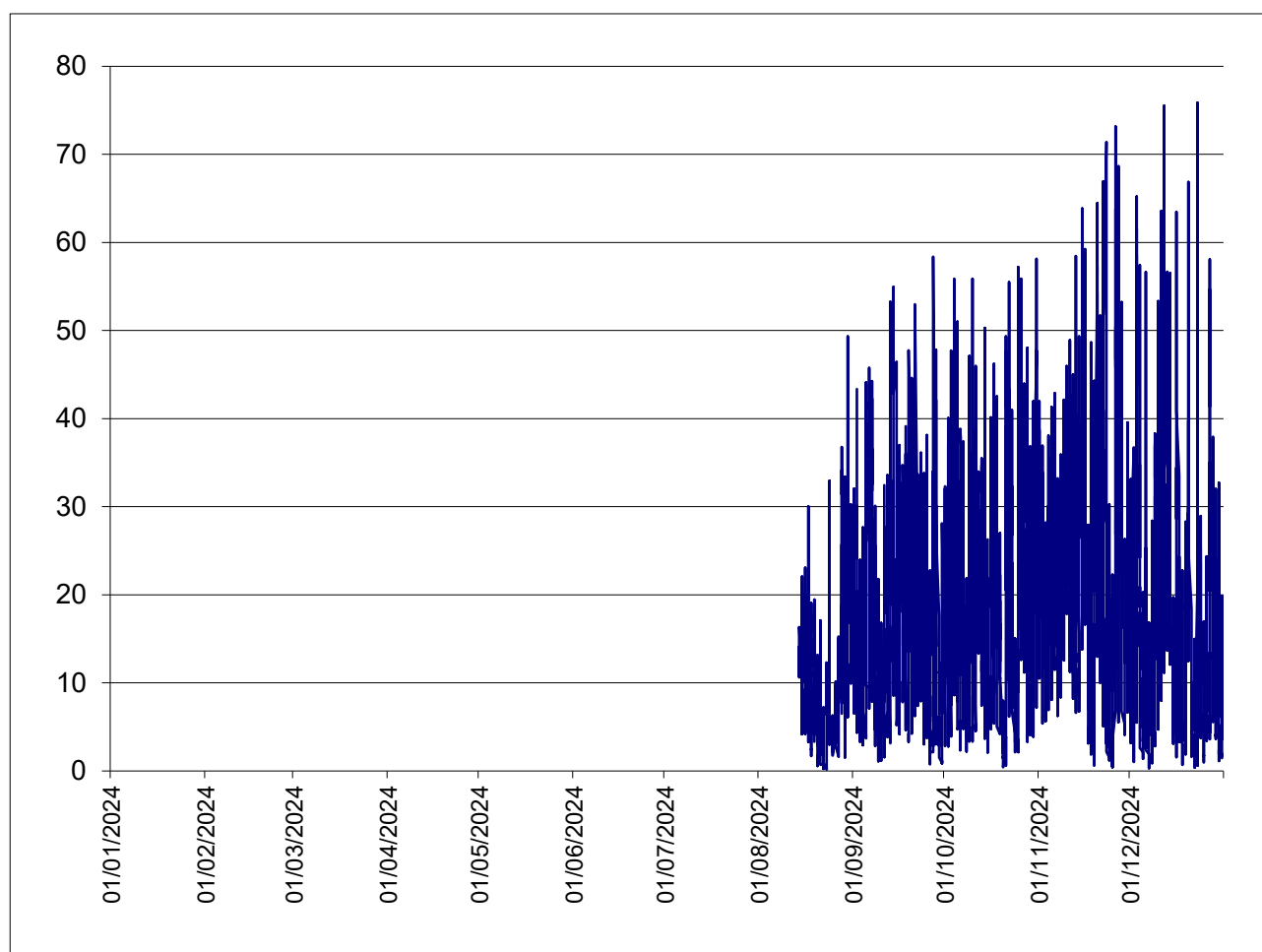
- Comparison of data with other pollutants and other appropriate AURN network sites (roadside sites and other sites in the south west),
- Final checking and deletion of data marked as possibly erroneous,
- Removal of data from unrepresentative periods of operation (e.g. road works in immediate vicinity 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 38% in 2024 because of essential repairs to the roof of the building housing the equipment (the RAMM museum).

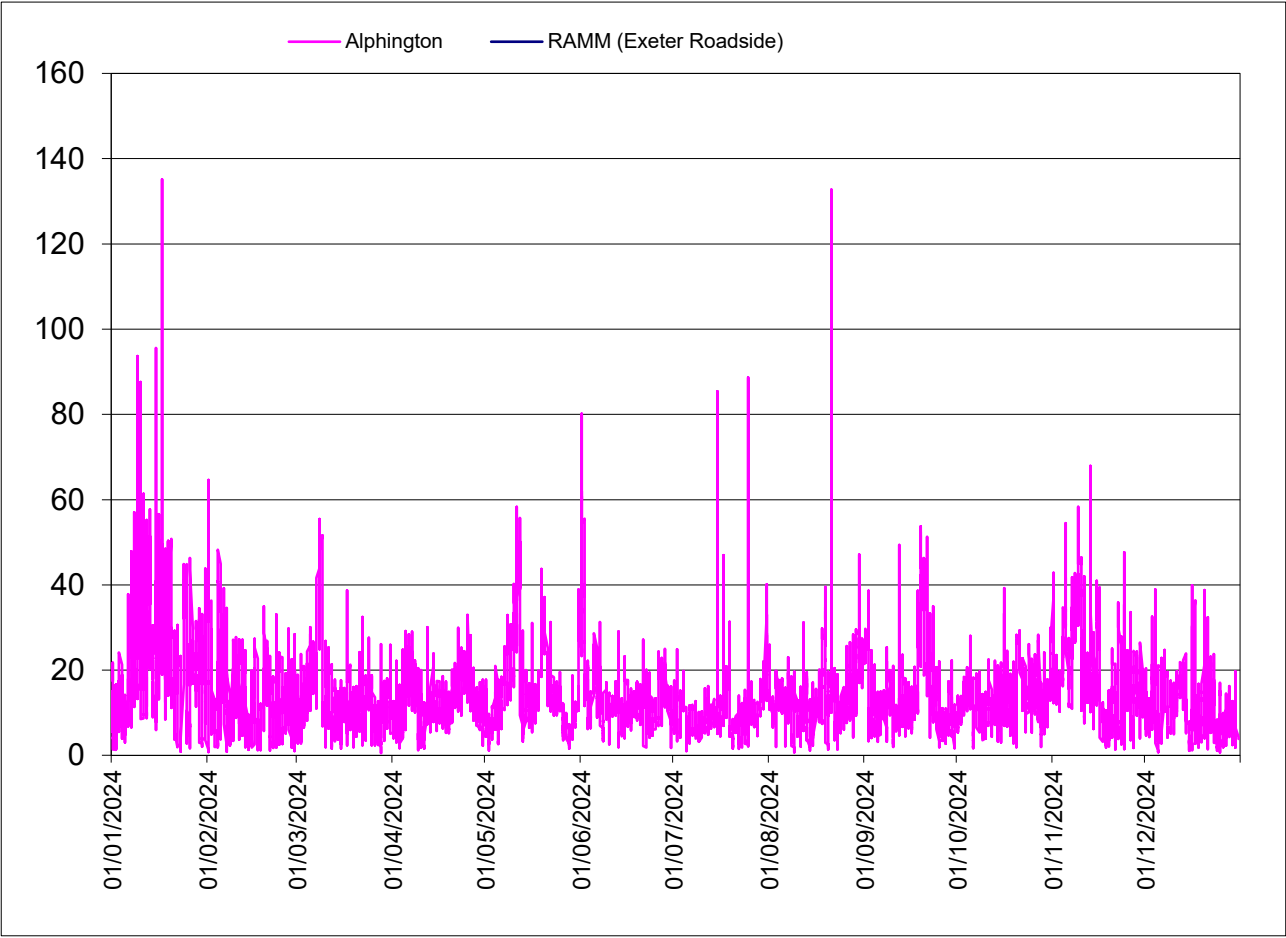
Plots of hourly average values for nitrogen dioxide, PM₁₀ and PM_{2.5} are shown below in Figures C.1, C.2 and C.3.

Figure C. 1 - Hourly NO₂ data from Exeter Roadside CM1 (RAMM) (µg/m³)

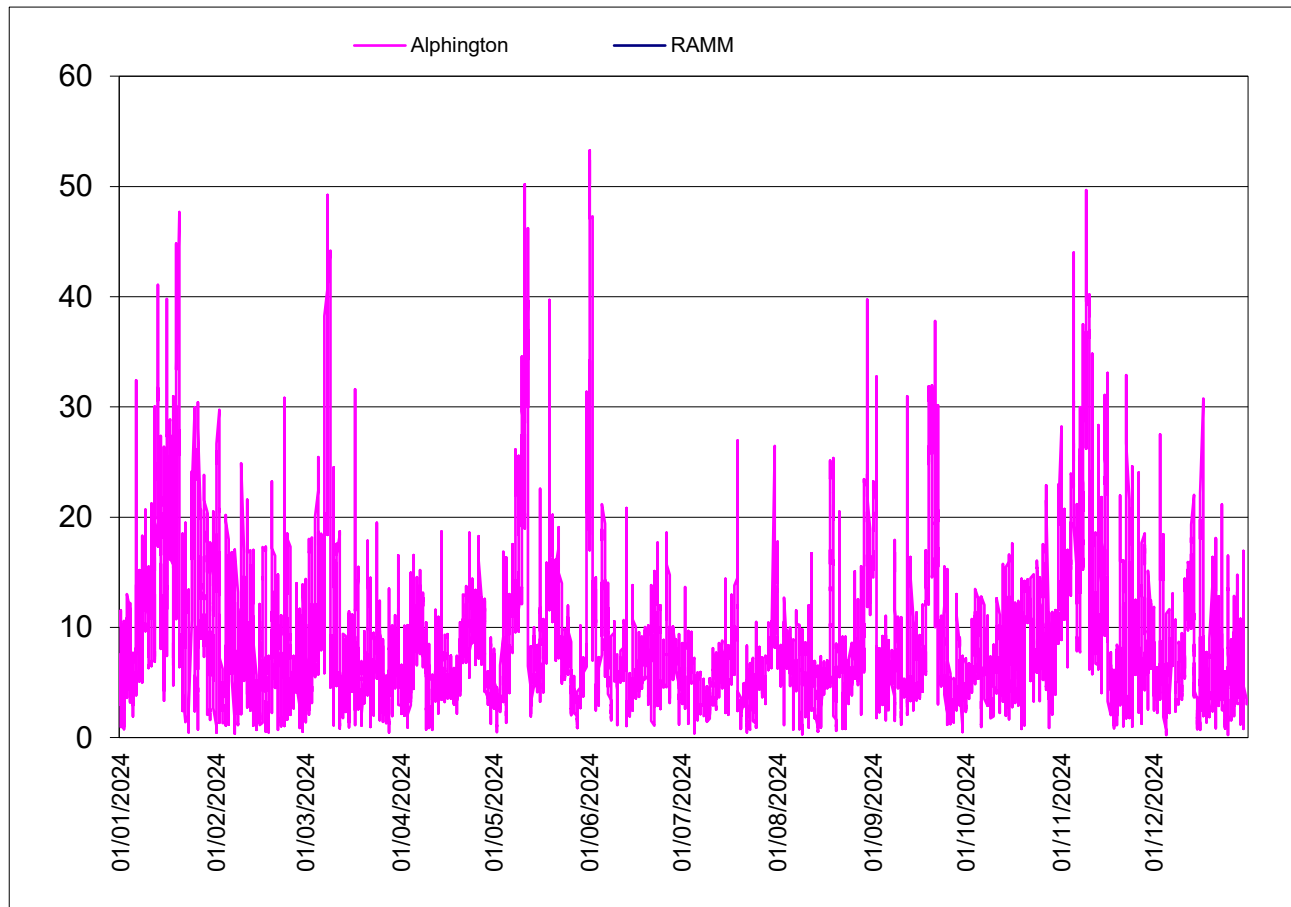


This graph shows the hourly NO₂ data from the analyser at RAMM

Figure C. 2 - Hourly PM₁₀ data from Alphington Street (CM2) (µg/m³)



This graph shows the hourly PM₁₀ data from the analyser at the Alphington Street.

Figure C. 3 - Hourly PM_{2.5} data from Alphington Street (CM2) (µg/m³)

This graph shows the hourly PM_{2.5} data from the analyser at the Alphington Street.

PM₁₀ and PM_{2.5} Monitoring Adjustment

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

Automatic Monitoring Annualisation

Data capture from the NO₂, and O₃ continuous analysers at RAMM (Exeter Roadside CM1) were below 75%.

This data has been annualised using the method described in the Technical Guidance. Annualisation factors were gained using data from nearby (<50 miles) AURN urban or rural background sites which have data capture of over 75%. The annualisation factors for each pollutant are similar for all the sites used. Details of the calculated period means,

annual to period mean ratios and the annualised annual means are summarised in Tables C.2 and C.3.

Table C. 2 - Automatic NO₂ Annualisation Summary (concentrations in µg/m³)

Background Site	Annual Data Capture (%)	Annual Mean (A _m)	CM1	
			Period Mean (P _m)	Ratio (A _m / P _m)
Charlton Mackerell	97.8	3.7	4.4	0.850
Plymouth Centre	99.4	13.7	15.2	0.902
Yarner Wood	95.0	2.4	2.6	0.897
Average (R _a)			0.883	
Raw Data Annual Mean (M)			19.4	
Annualised Annual Mean (M x R _a)			17.1	

Table C. 3 - Automatic O₃ Annualisation Summary (concentrations in µg/m³)

Background Site	Annual Data Capture (%)	Annual Mean (A _m)	CM1	
			Period Mean (P _m)	Ratio (A _m / P _m)
Charlton Mackerell	98.6	58.8	51.0	1.153
Honiton	89.5	58.4	51.4	1.135
Plymouth Centre	96.8	51.7	45.4	1.139
Yarner Wood	99.0	64.0	55.2	1.159
Average (R _a)			1.146	
Raw Data Annual Mean (M)			40.4	
Annualised Annual Mean (M x R _a)			46.3	

NO₂ Fall-off with Distance from the Road

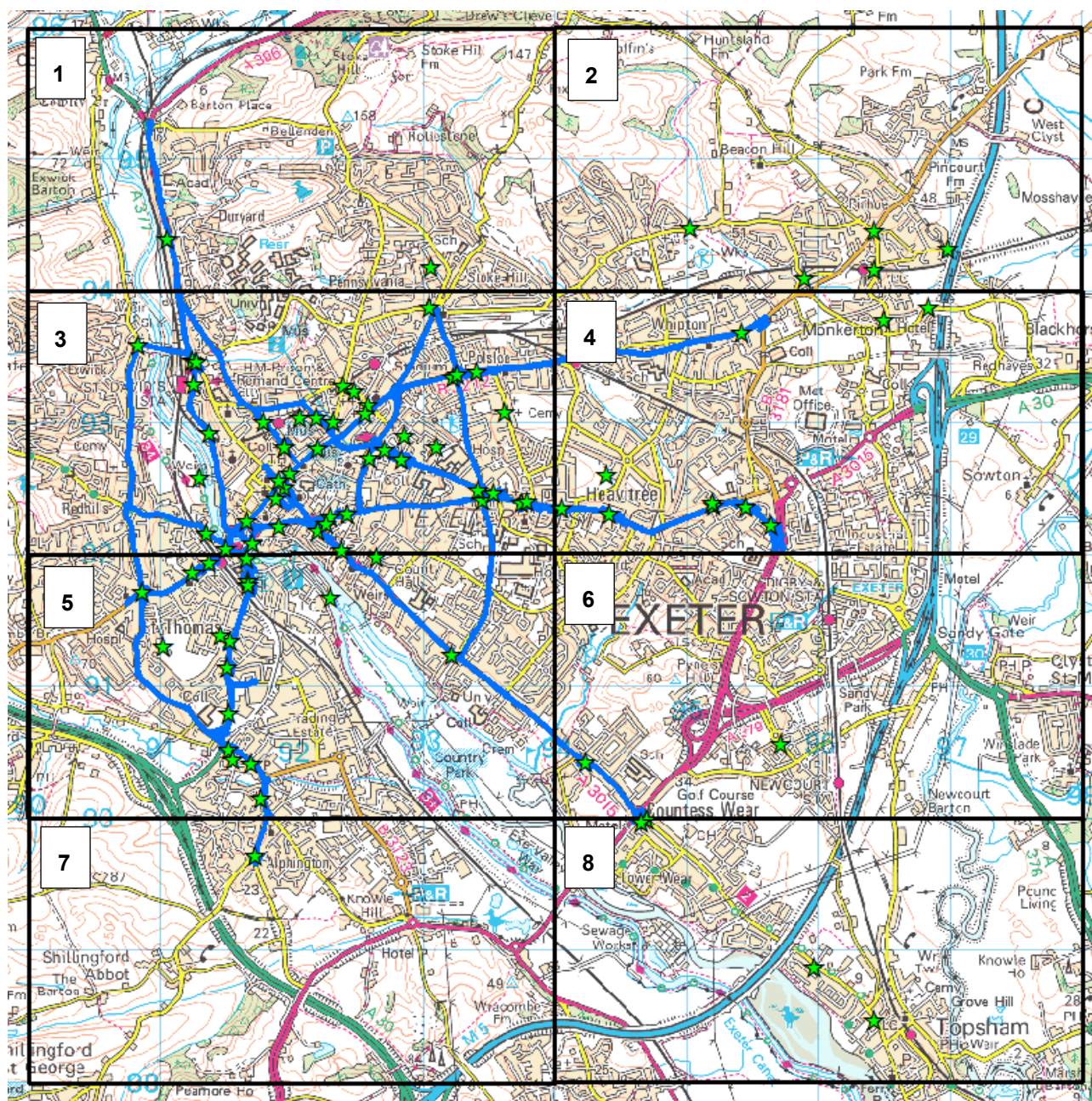
No automatic NO₂ monitoring locations within Exeter City Council required distance correction during 2024.

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

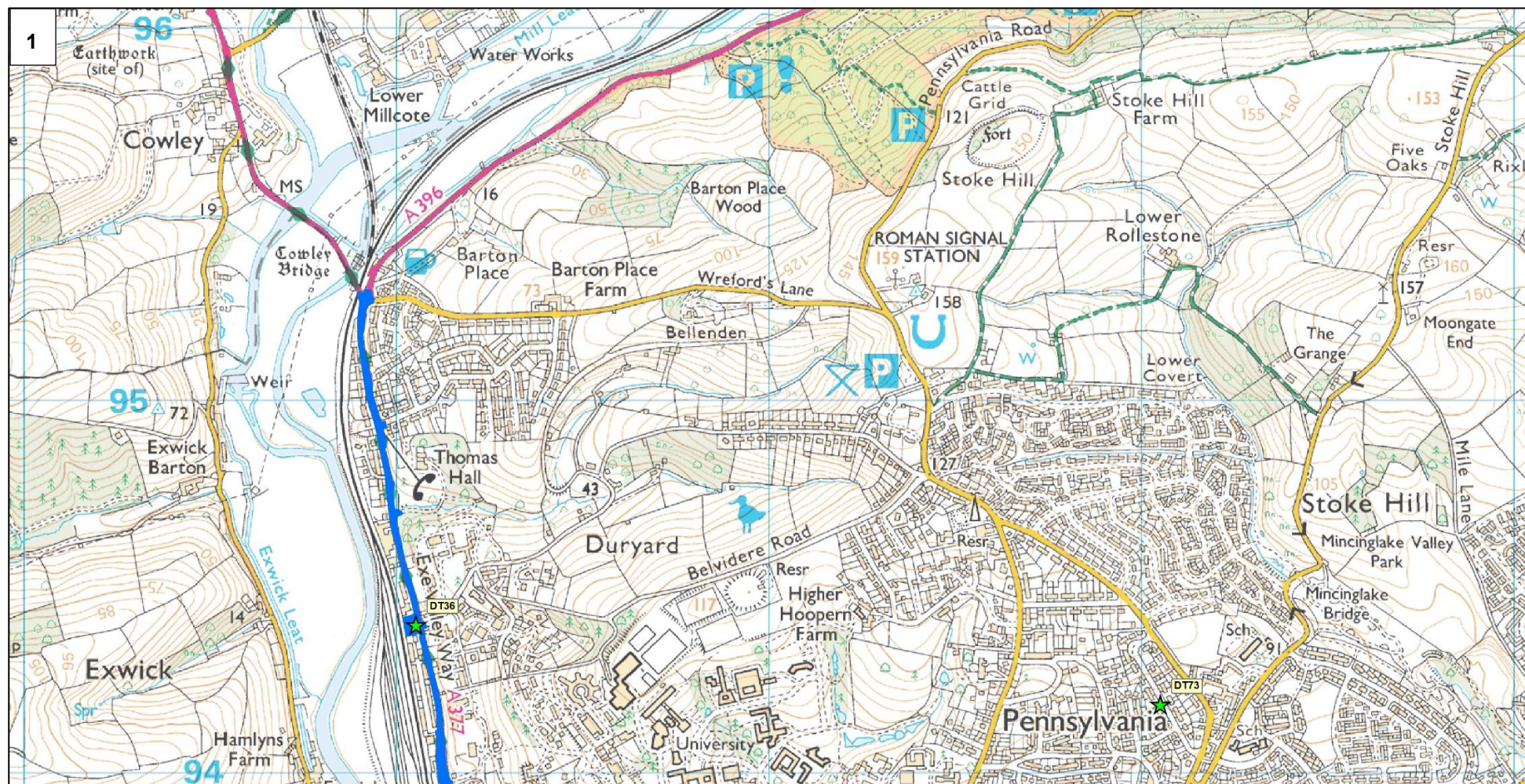
Figure D. 1 - Map of Non-Automatic Monitoring Sites

The monitoring locations and 2023 data can also be viewed using an online map [here](#).

Monitoring location = ★
AQMA =



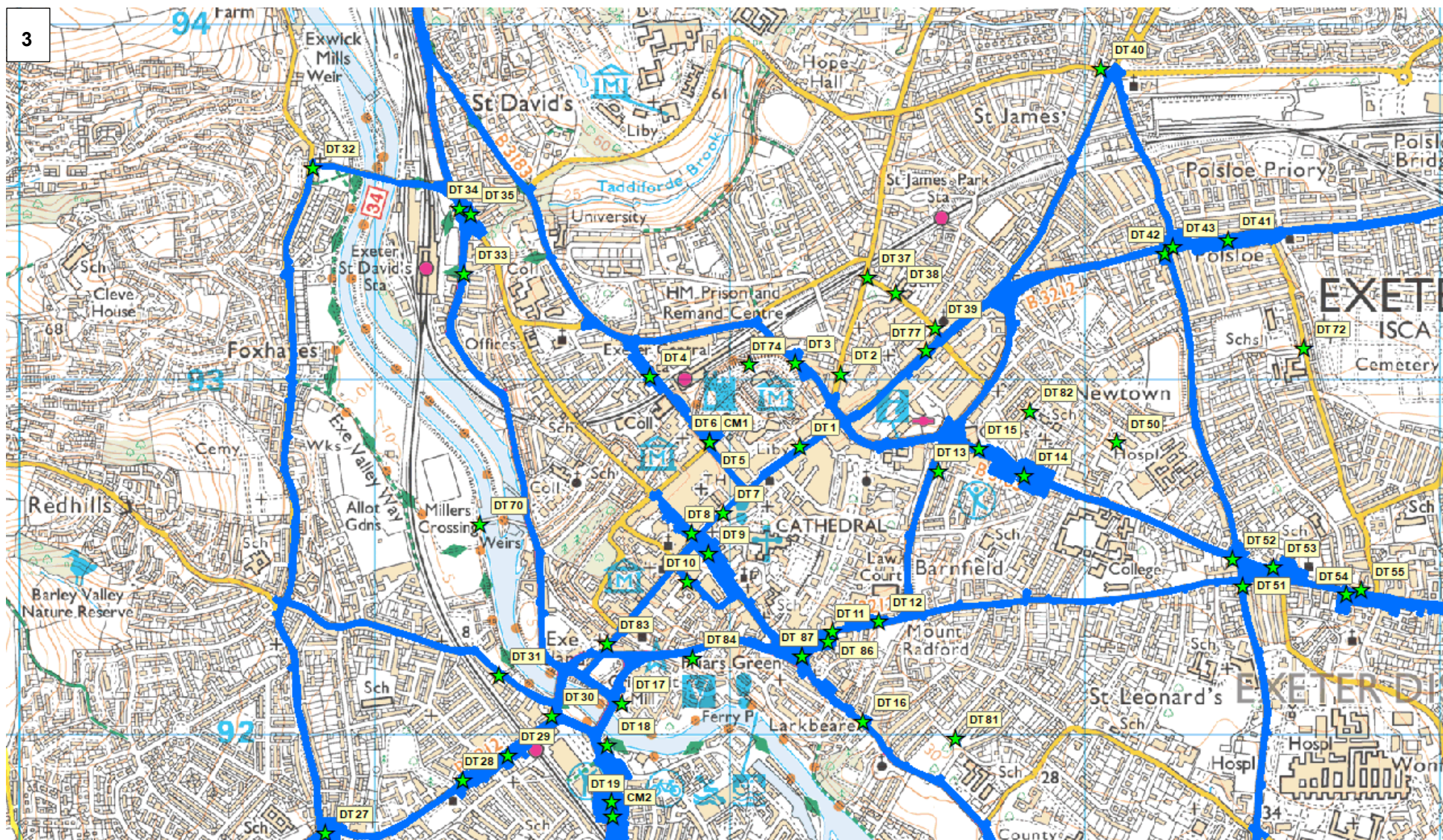
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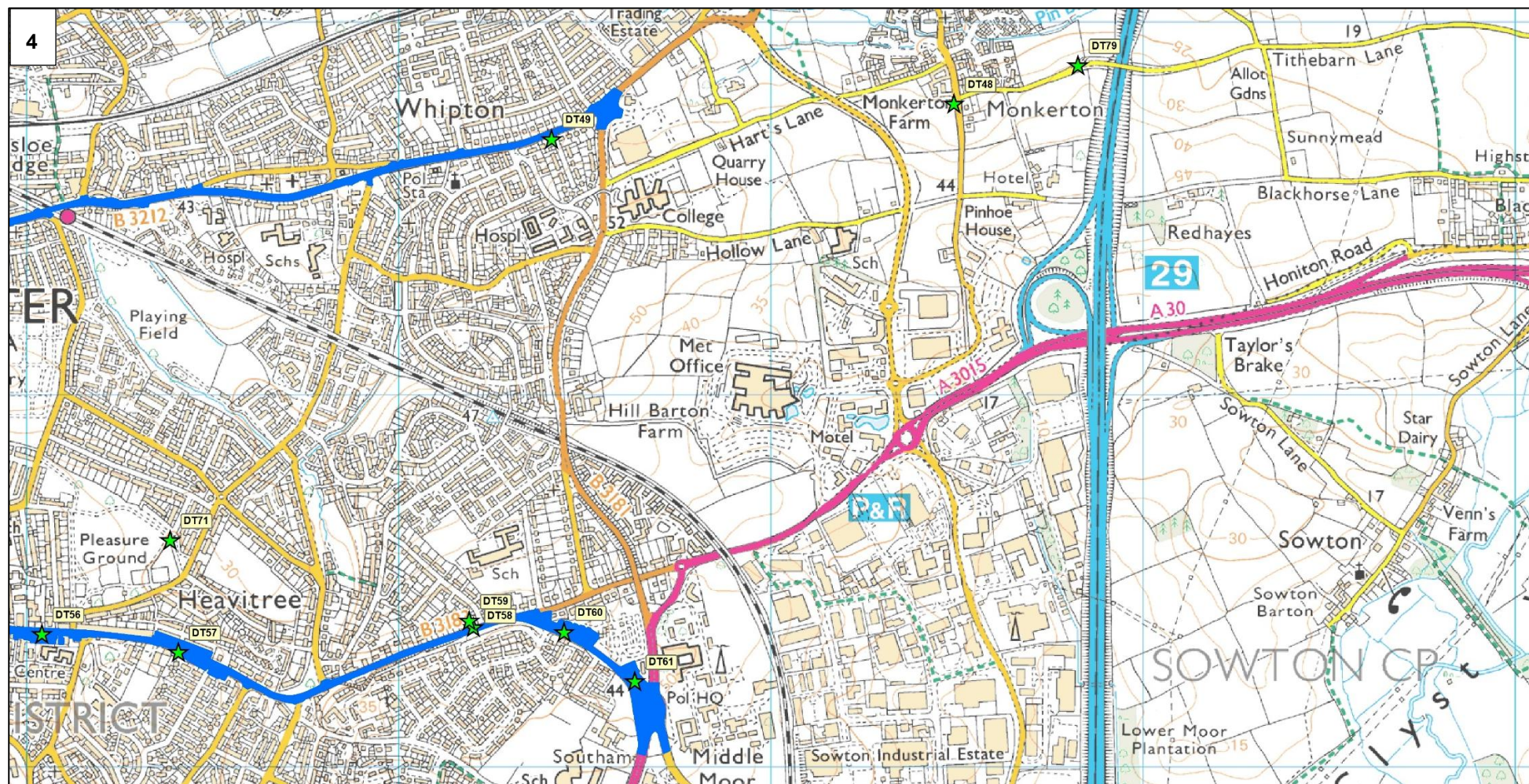
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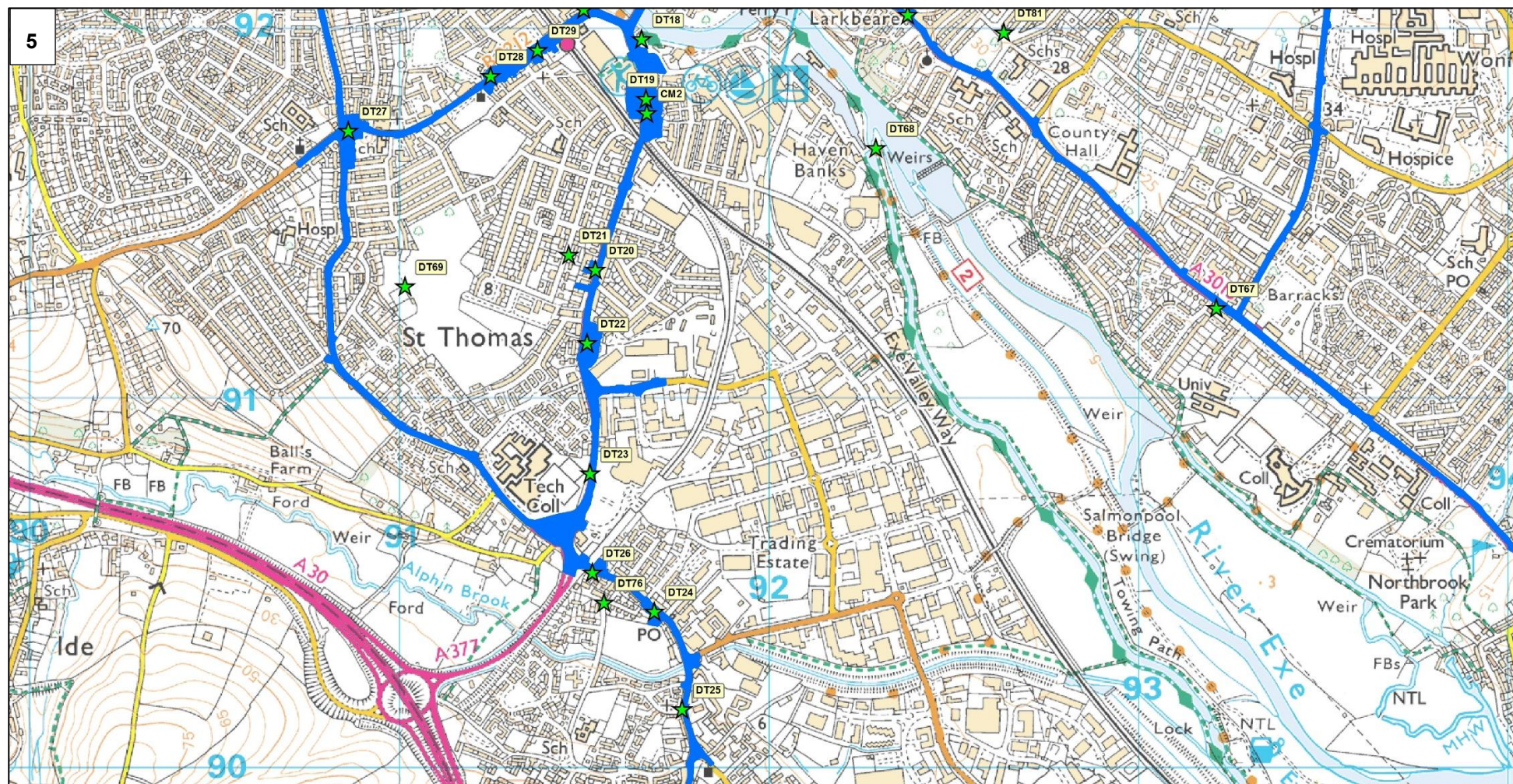
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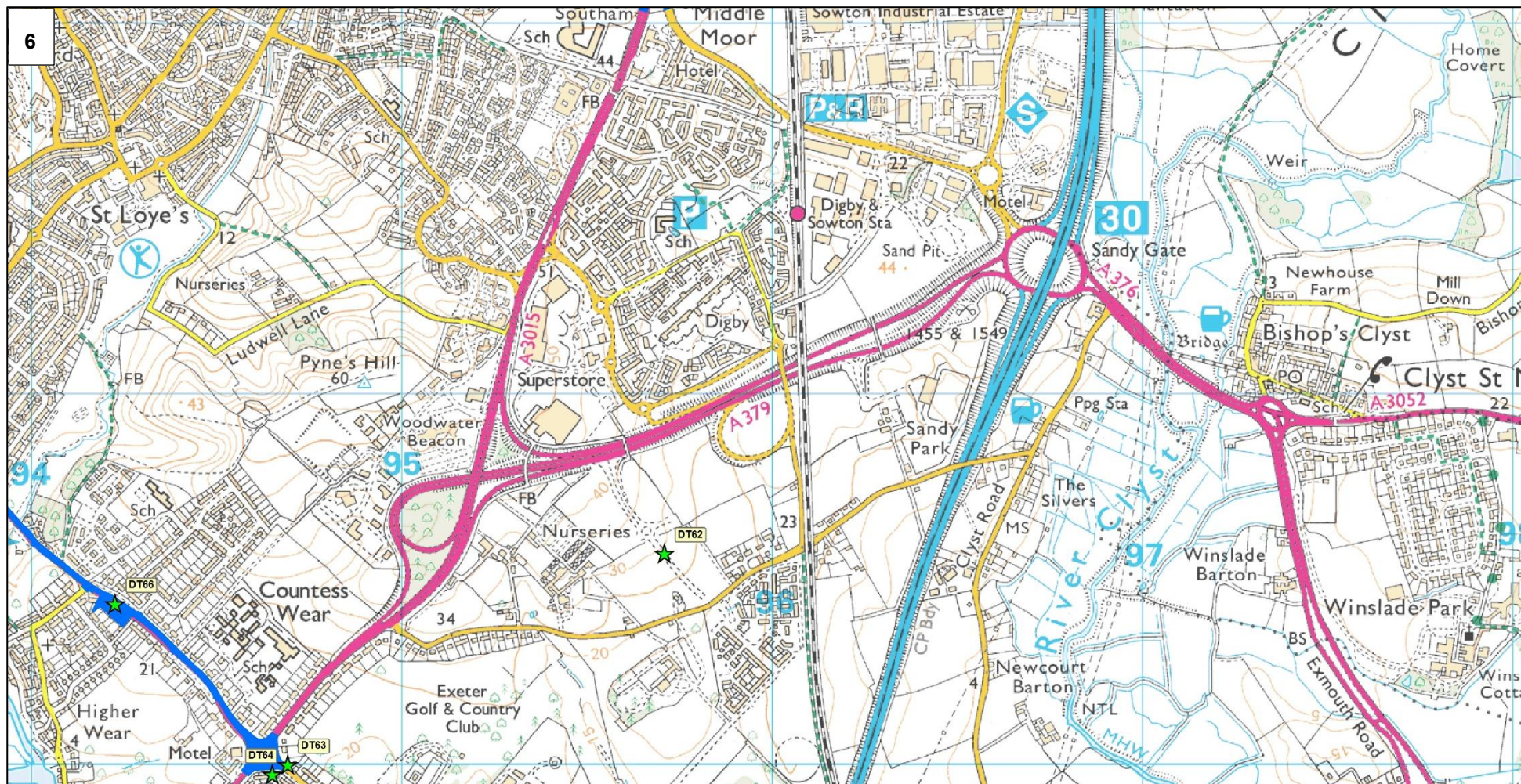
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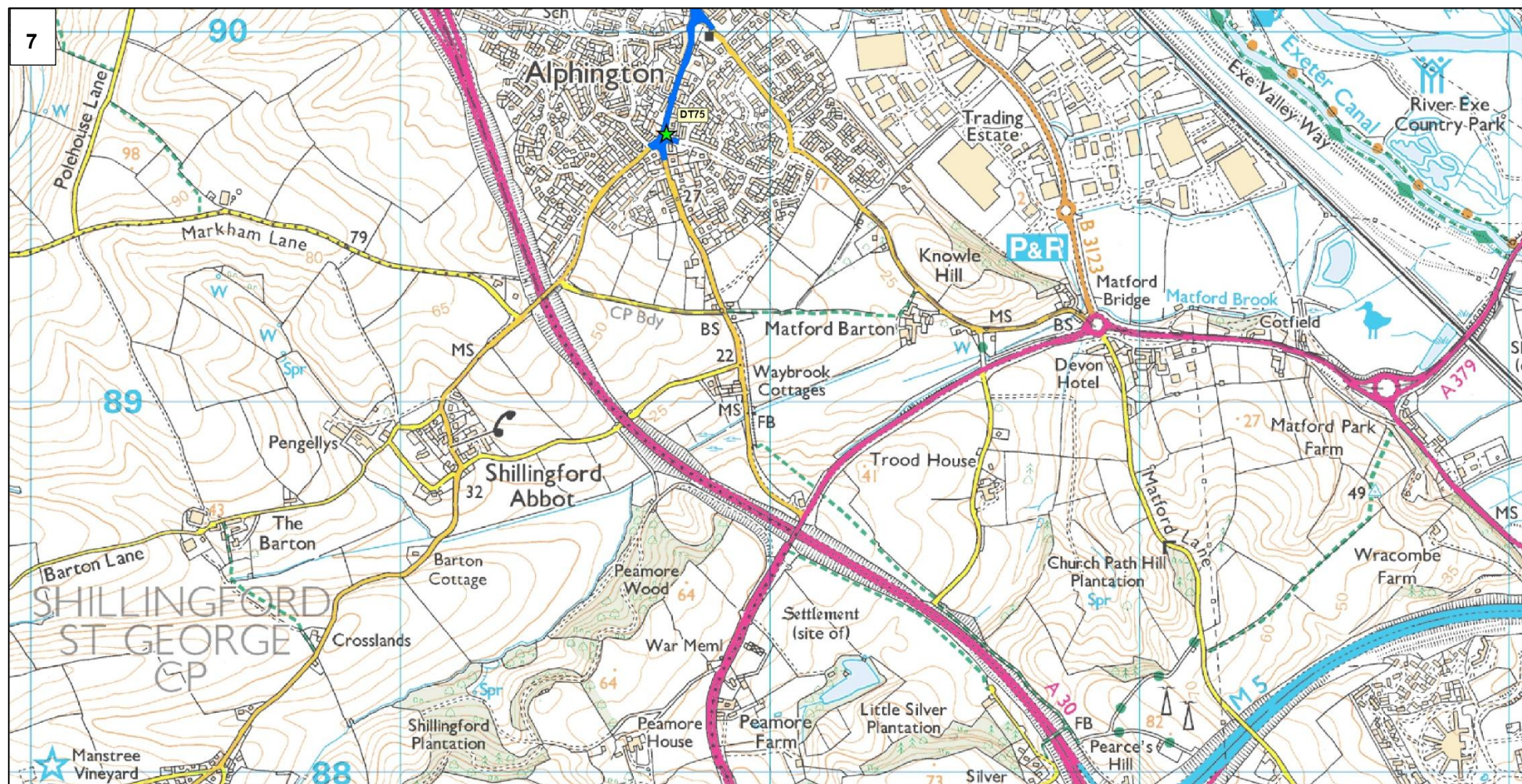
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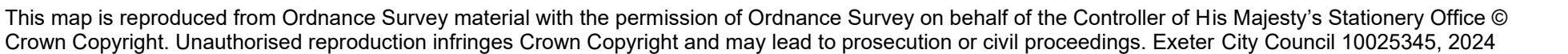
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Appendix E: Summary of Air Quality Objectives in England

Table E. 1 - Air Quality Objectives in England

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

Appendix F: AQMA Boundary Review

There are two steps involved in the process. Firstly, the Council needs to have confidence that it has identified all locations for which the air quality objectives are exceeded. Secondly, it then needs to identify an AQMA boundary which includes these locations. The AQMA boundary can be larger than the area of exceedance although the current intent is for a smaller, more specific 'hot spot' AQMA which provides a clearer focus for AQAP measures.

The policy and technical guidance do not specify how councils should identify the limits to the areas of exceedance, only saying that the authority should have broad confidence in the monitoring data and/or modelling, be aware of the uncertainties and show in their annual report what steps they have taken to minimise these. However, the guidance goes on to warn local authorities against expending significant resources narrowing down the parameters of an AQMA to the detriment of identifying measures and taking action. DEFRA suggest that where normal annual monitoring and local intelligence shows a persistent exceedance (or risk of exceedance) the local authority consider moving immediately to declaring and establishing (or extending) an AQMA and hence to the development of AQAP measures to remediate the problem. Only local authorities who, until now, have had few air quality problems, or have sufficient doubts, should consider the necessity of obtaining further supporting information.

This paragraph above suggests that provided the uncertainties can be minimised there is no absolute requirement for modelling of the extent of an exceedance. The question is therefore whether the monitoring that is currently undertaken by the Council is sufficient to allow us to determine the extent of the exceedance.

The 2024 data presented in this report shows that only the East Wonford Hill diffusion tube (DT57) has had exceedances during the last 3 years. Furthermore, it is possible to say the following:

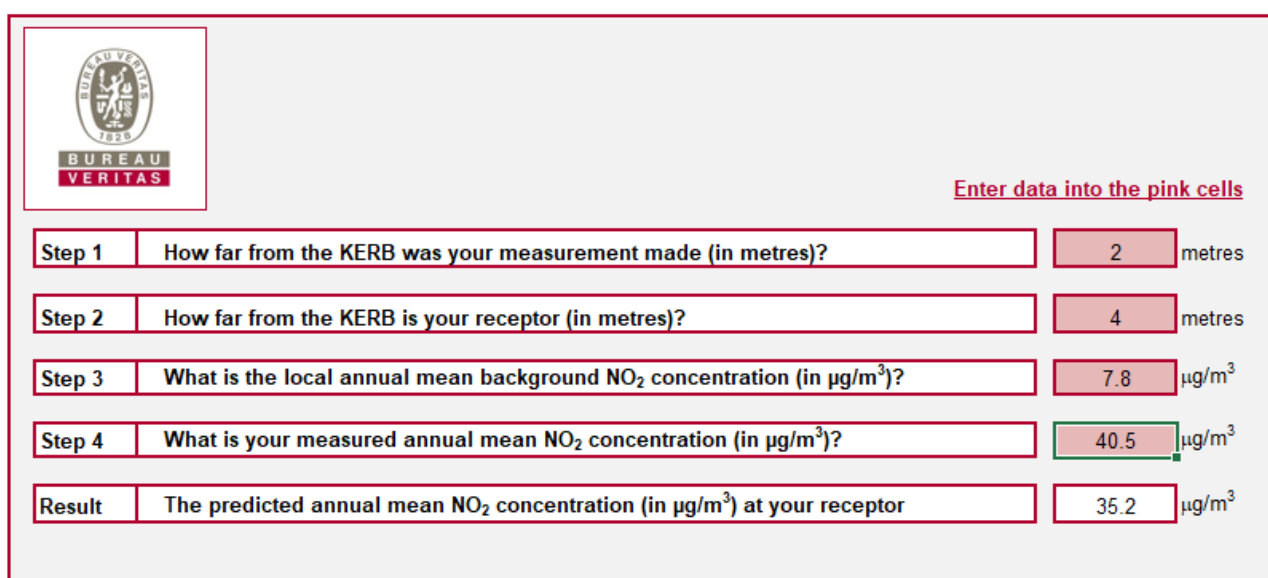
- The monitoring meets the DEFRA guidance for QA/QC, so uncertainties are reasonably well understood and controlled.
- The western (inner) extent of the exceedance is likely to be at or before the junction with Butts Road, because the diffusion tube beyond this junction (Fore Street inbound, DT56) is below the objective. This location is shown as the western red line on the map in Figure F.10 below.


- The eastern (outer) extent of the exceedance is likely to be at or before the junction with Rifford Road, because the diffusion tubes beyond this location (Honiton Road, DT58 and Honiton Road façade, DT59) are both below the objective. This location is shown as the eastern red line on the map in Figure F.10 below.
- The area of exceedance will be no larger than the existing AQMA, given that concentrations at all monitoring sites have reduced since that AQMA was declared.

The other question to be considered is whether both sides of this section of road are affected, or only the southern side (where the houses are closer to the roadside and where the diffusion tube is located). Currently the AQMA boundary includes the houses on both sides of the road, based on dispersion modelling undertaken prior to declaration, as shown in the map below. There is no suggestion that the extent of the exceedance will be greater than it was at that stage, given that monitored concentrations have fallen. There are two possible approaches:

- 1) Use the [attenuation with distance calculator](#) to predict the likely concentration at the façade of the houses on the north side. Using the 2023 data (which is higher and therefore more conservative than the 2024 data), this shows a level of 35.2 mg/m³ at the closest house to the road. This suggests that only the south side is exceeding the limit. The background concentration for this calculation has been taken from the Heavitree Pleasure Ground diffusion tube (DT71), which is shown on the map in Figure F.2 below.

Figure F. 1 - Attenuation with Distance Calculation



 **BUREAU VERITAS**

Enter data into the pink cells

Step 1	How far from the KERB was your measurement made (in metres)?	2	metres
Step 2	How far from the KERB is your receptor (in metres)?	4	metres
Step 3	What is the local annual mean background NO ₂ concentration (in µg/m ³)?	7.8	µg/m ³
Step 4	What is your measured annual mean NO ₂ concentration (in µg/m ³)?	40.5	µg/m ³
Result	The predicted annual mean NO ₂ concentration (in µg/m ³) at your receptor	35.2	µg/m ³

- 2) Include both sides of the road even though there is no evidence that both are affected. This takes into account the uncertainty in the process described above, is

precautionary and also avoids making just a very small number of properties the subject of the AQAP. Including both sides of the road in this way would not 'dilute' the impact of the AQAP because it would still only include just a short stretch of one road.

It is proposed to adopt option 2 and the draft AQMA order, including the new boundary, is shown below. The new area includes 225m of road and 47 residential addresses.

This approach was sent to the LAQM helpdesk in May 2024 and the following response was received: We have reviewed the below and agree with your approach. Adopting option 2 seems to be this most robust approach and your reasoning is welcomed.

The Council will undertake an 10-week consultation on the proposed new boundary. The following consultees will be asked for their views:

- Residents within the new AQMA boundary (by means of a letter)
- The public, by means of information on the City Council website.
- Councillors on the Executive committee, by means of the annual report
- Neighbouring District Councils and the County Council, by letter
- Director of Public Health, by letter
- Highways England, by letter
- Environment Agency, by letter
- Natural England, by letter

The draft consultation plan is included below.

1. Title of consultation	
Consultation on the revision of the Air Quality Management Area boundary.	
2. Responsible officers	
Director	Adrian Pengelly
Head of Service	Simon Lane
Consultation lead officer	Simon Lane
3. Purpose of the consultation	
<i>Explain why the council is consulting on this issue. Where the council has a preferred option, state this and explain how and why that preference was chosen. Where specific</i>	

options have been rejected, explain why we do not consider them practical. Where options are offered, they should be realistic and deliverable.

It is necessary to amend the boundary of the current Air Quality Management Area to reflect the significantly improved levels of nitrogen dioxide in the city. There is a legal requirement to reduce the size of the current Area to reflect this change.

Exeter City Council's proposed new boundary, and the justification for this, are described in the Air Quality Annual Status Report for 2025.

4. Timing, duration and key milestones

Set out when will the consultation take place and for how long (6-8 weeks minimum)

The consultation will commence when the Annual Status Report is presented to Executive committee on the 4 November 2025. It will end on 16 January 2026. The consultation period is 10 weeks.

Set out other key milestones e.g. date of report to committee, data analysis schedule and date of publication of results and feedback

Once the consultation period has ended, the responses will be evaluated and the final order then submitted to DEFRA in February 2026 for their approval. The new order will be adopted and signed by the end of April 2026.

5. Equality Impact Assessment

Confirm that a EQIA has been completed and date

The EQIA is included within the Annual Status Report.

6. Consultees and how they will be consulted (survey, public meeting, exhibition, focus group)

Consultee	Method
<i>Those most affected by the proposal (Those living in the revised Area)</i>	Direct letter to households
<i>Exeter residents</i>	Consultation advertised on City Council website
<i>General public</i>	Consultation advertised on City Council website
<i>Members (ECC and DCC)</i>	Consultation starts after report is taken to Executive Committee
<i>Partners and other statutory stakeholders</i>	Statutory consultees will be written to directly (see list in Annual Status report)

Other stakeholders	
---------------------------	--

7. Public Sector Equality Duty

Set out any special provisions that are required to ensure that people with protected characteristics are able to partake in the consultation.

Characteristic	Special provision
Age	Consultees will have the opportunity to respond by electronic communication, telephone or a personal visit (in the case of residents within the Area only)
Disability(includes mobility, sensory, learning and mental health)	Consultees will have the opportunity to respond by electronic communication, telephone or a personal visit (in the case of residents within the Area)
Race/ethnicity(includes Gypsies and Travellers),	No special provisions required
Sex and gender	No special provisions required
Gender identity	No special provisions required
Religion and belief	No special provisions required
Sexual orientation	No special provisions required
Pregnant women, new and breastfeeding mothers,	No special provisions required
Marriage and civil partnership	No special provisions required

8. Supporting information

What background information will be provided for consultees and in what format?

The Annual Status Report, and a summary of it, will be available on the Council's website. A copy of the summary will be included with the letters to the households within the area.

9. Publicity

How will consultees be made aware of the consultation and the results?

Please see section 6. The final report will be to Full Council with the decision being published on the Council's website (with minutes of the meetings).

10. Accessibility

How will you ensure that consultation material meets accessibility and readability standards? (See intranet)

The accessibility and readability standards will be adhered to.

11. Demographics

What demographic data, if any, will be collected on consultees?

None

12. GDPR

If personal data is being collected, confirm that this has been agreed with the Data Protection Officer and that an appropriate privacy statement is included in any surveys.

None

13. Resource implications

Set out which internal resources will support this consultation or provide details of external resource requirements and means of funding.

The consultation will be undertaken within existing resources.

14. Carbon Footprint (Environmental) Implications:

How are carbon/environmental impacts arising from the consultation being addressed?

The subject of the consultation has been brought about as a result of improving levels of traffic pollution.

15. Approval

<i>Head of Service</i>		<i>Director</i>	
Name		Name	
Signature		Signature	
Date		Date	

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Proposed New AQMA Order



Environment Act 1995 Part IV Section 83(1)

The Exeter Air Quality Management Area Order 2026

Exeter City Council, in exercise of the powers conferred upon it by Section 83(1) of the Environment Act 1995, hereby makes the following Order:

1. This Order may be cited/referred to as the Exeter Air Quality Management Area Order 2026 and shall come into effect on [date TBC].
2. The area shown on the attached map in red is to be designated as an air quality management area (the designated area), incorporating a section of East Wonford Hill. The map may be viewed at the Council Offices. This Area is designated in relation to a likely breach of the nitrogen dioxide annual mean objective as specified in the Air Quality Regulations 2000.
3. This Order shall remain in force until it is varied or revoked by a subsequent order.
4. The Exeter Air Quality Management Area 2010 shall be varied accordingly.

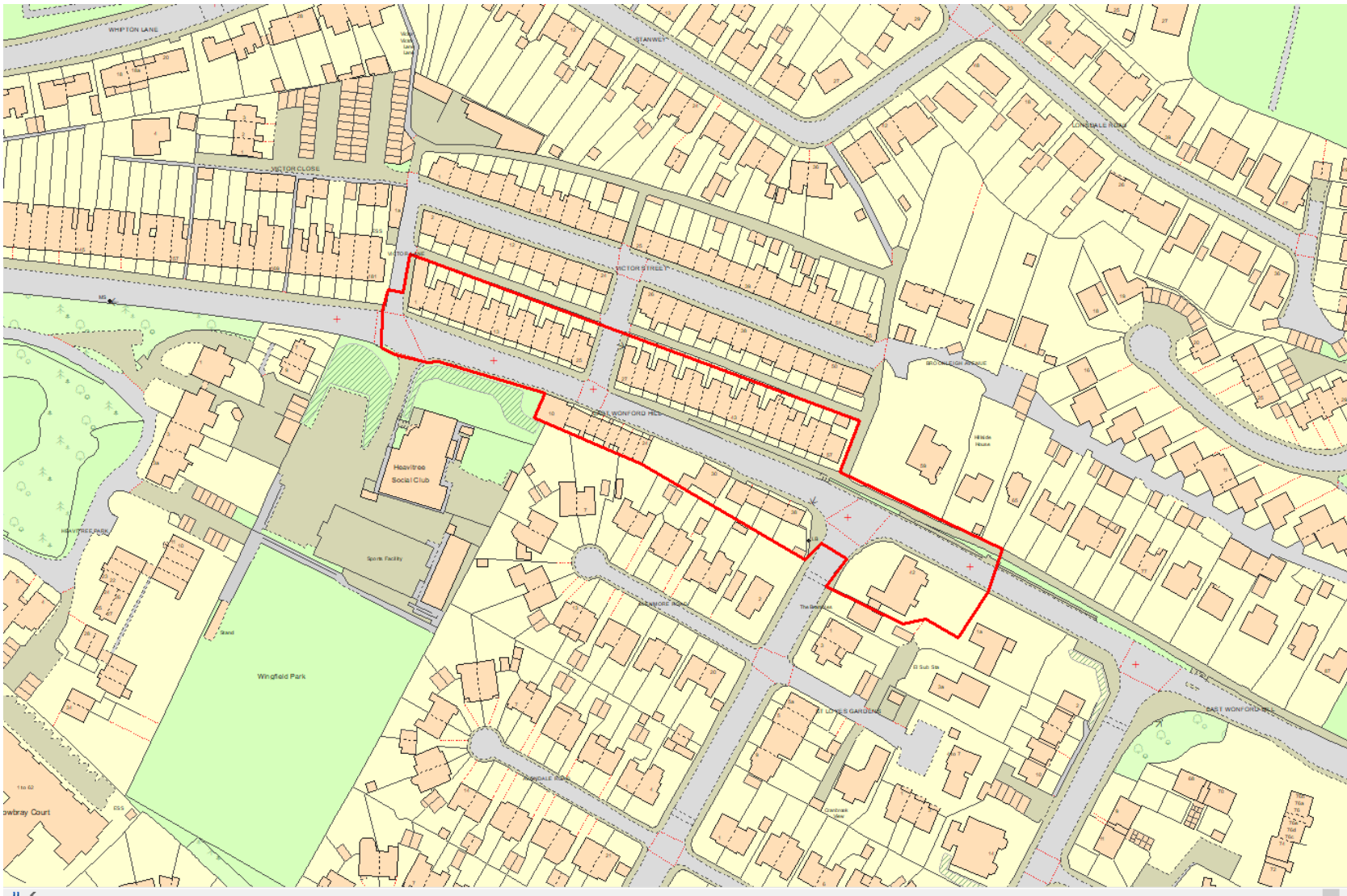
Dated the [date]

The Common Seal of Exeter City Council was hereunto affixed in the presence of:

A duly authorised signatory

Seal no.

The Exeter Air Quality Management Area



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The Annual Status Report 2024 already assessed any likely equalities impact for amending the AQMA. The assessment identified either no impact or positive impact and concluded no required actions for promoting inclusion. More detail of the assessment has been reproduced below for reference.

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).	Positive / No Impact		This change can occur because of a reduction in nitrogen dioxide concentrations such that a far smaller area of the city is above the health-based objectives for this type of pollution. This means that the health effects of nitrogen dioxide will be reduced. It also means that a more focussed new Air Quality Action Plan (AQAP) can subsequently be produced. This will bring about further improvements in air quality and subsequently health. Any necessary restrictions or changes in the new plan can be limited to the region of the much smaller new AQMA if appropriate. (The new Action Plan will be subject to a further EQIA during its development).
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.	Positive		Poor air quality has a greater effect on vulnerable persons, such as the very young, the very old and those with pre-existing health conditions.
Sex/Gender	Positive / No Impact		As above
Gender reassignment	Positive / No Impact		As above

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	Positive / No Impact		As above
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Positive / No Impact		As above
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).	Positive		Poor air quality has a greater effect on vulnerable persons, such as the very young, the very old and those with pre-existing health conditions.
Pregnancy and maternity including new and breast feeding mothers	Positive		Poor air quality has a greater effect on vulnerable persons, such as the very young, the very old and those with pre-existing health conditions.
Marriage and civil partnership status	Positive / No Impact		As above

Actions identified that will mitigate any negative impacts and/or promote inclusion

- None required

Officer: Simon Lane

Date: June 2025

Appendix G: NO₂ Trends at East Wonford Hill (DT57)

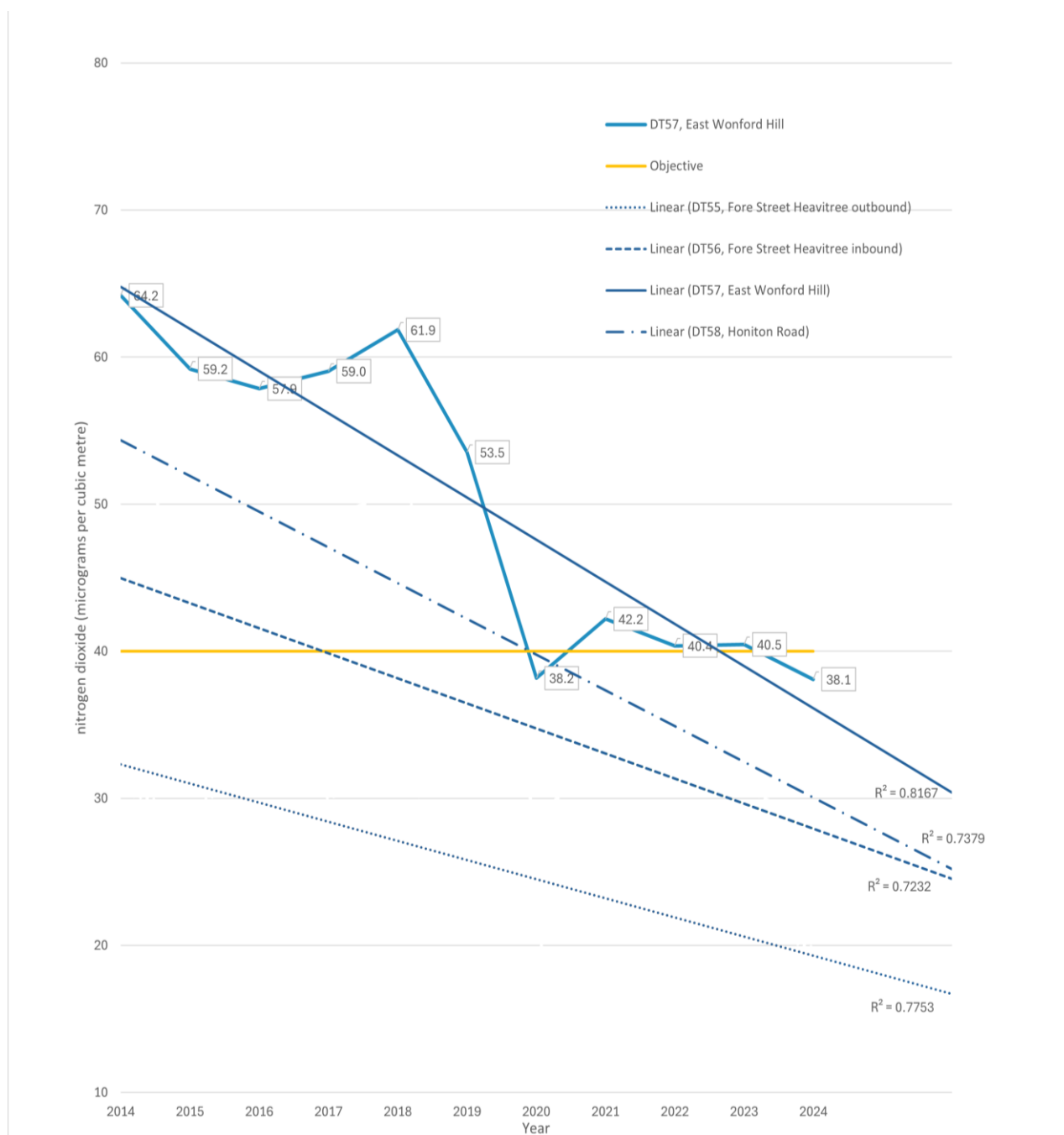
Prior to 2024, the only year when concentrations at East Wonford Hill (DT57) were below the objective was 2020 during the COVID pandemic. In 2024 levels were similar to those in 2020, i.e. 1.8 µg/m³ below the objective. The exceedances in both 2022 and 2023 were small at just 0.4 µg/m³ and 0.5 µg/m³, respectively.

Further assessment of the trends in concentrations in this area are shown in Figure G1 below, including regression lines. This suggests that the fall from 2023 to 2024 is within the expected trend of reducing pollution levels and not likely to be caused by any exceptional circumstances.

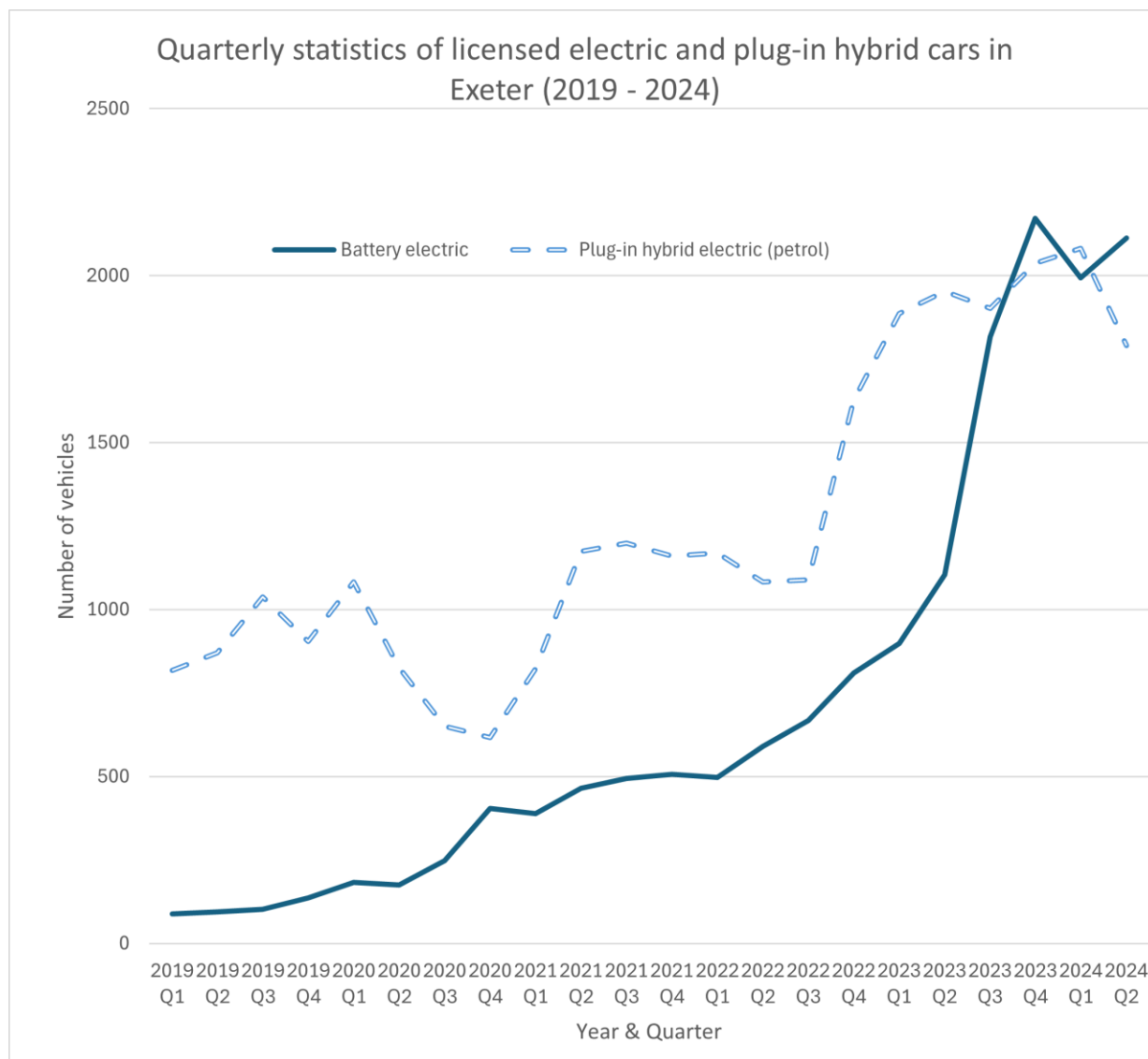
The reductions seen over this period are considered to be the cumulative effect of on-going factors, including the measures in the Air Quality Action Plan, new travel & working behaviours (fewer vehicles on roads, more home and remote working), and improvements in vehicle emission technologies.

The final of these factors is likely to have been of increasing significance over the period due to accelerated phasing out of older vehicles by electric and hybrid vehicles, particularly for cars. (Cars contributed to about 83% of the total traffic on roads along Heavitree Corridor in 2024, followed by light goods vehicles at about 12% (see Appendix I)). The growth was exponential for electric cars in Exeter, during the period from 2023 Q1 to 2024 Q1, as shown in Figure G2 (data are based on quarterly statistics presented in Appendix I).

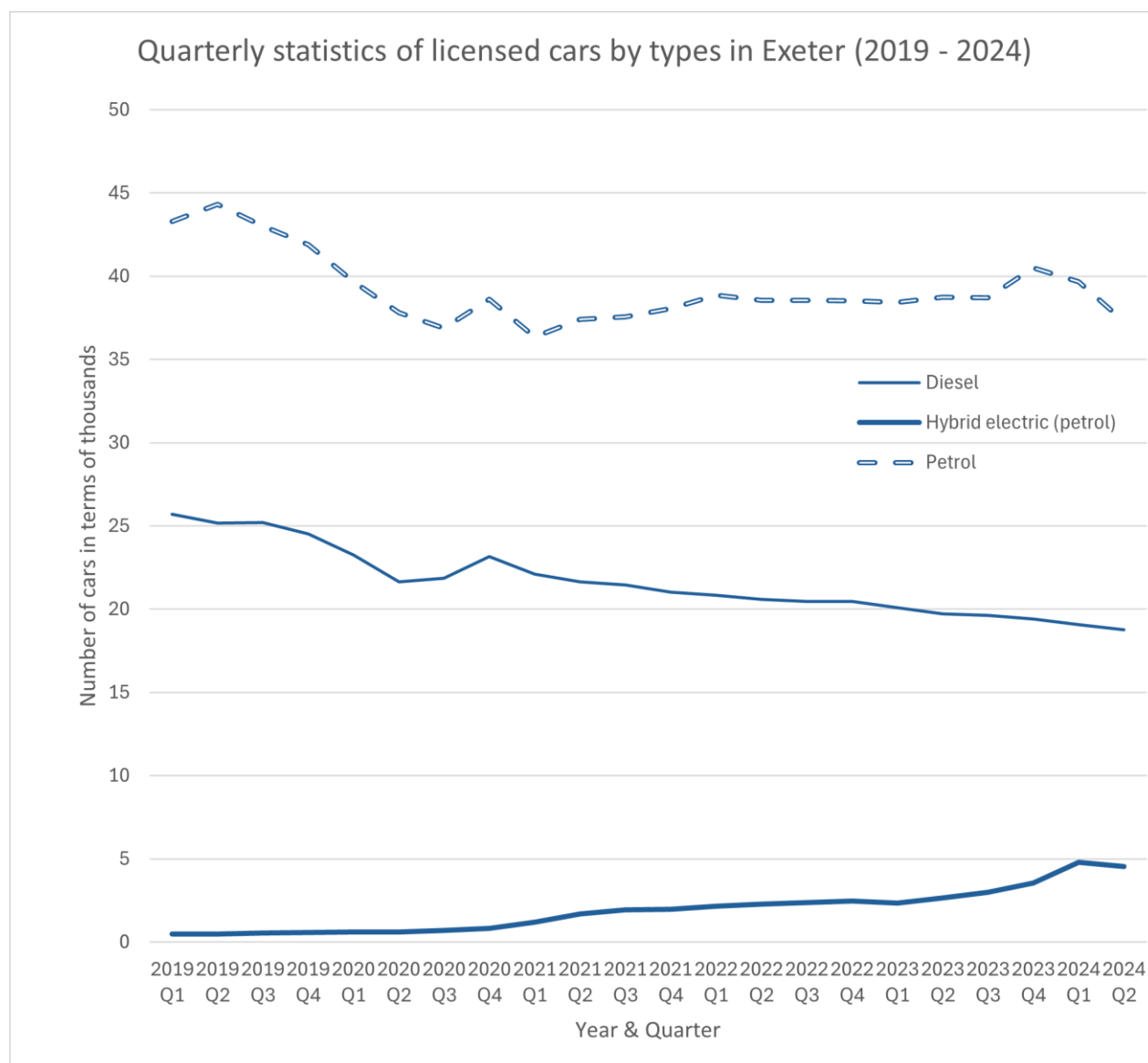
Meanwhile, the number of petrol and diesel cars licensed in Exeter decreased in 2024. The reduction from 2024 Q1 to Q2 actually outpaced the increase of licensed hybrid cars, i.e. 2462 and 829, respectively (see Appendix I). Since 2019 Q1, the number of diesel cars has been reducing year-on-year, with no exception from 2023 to 2024, except a small rise in 2020 Q4. (see Figure G3).

Figure G. 1 - Trends of Nitrogen Dioxide at Selected Locations within Heavitree Area

This figure presents long-term downward trends of NO₂ annual mean concentrations at East Wonford Hill site (DT57) and other nearby sites along Heavitree corridor. The trends suggest compliance at East Wonford Hill site is expected in 2024.

Figure G. 2 - Licensed electric and plug-in hybrid cars in Exeter

This figure shows that the growth was exponential for electric cars in Exeter, during the period from 2023 Q1 to 2024 Q1.

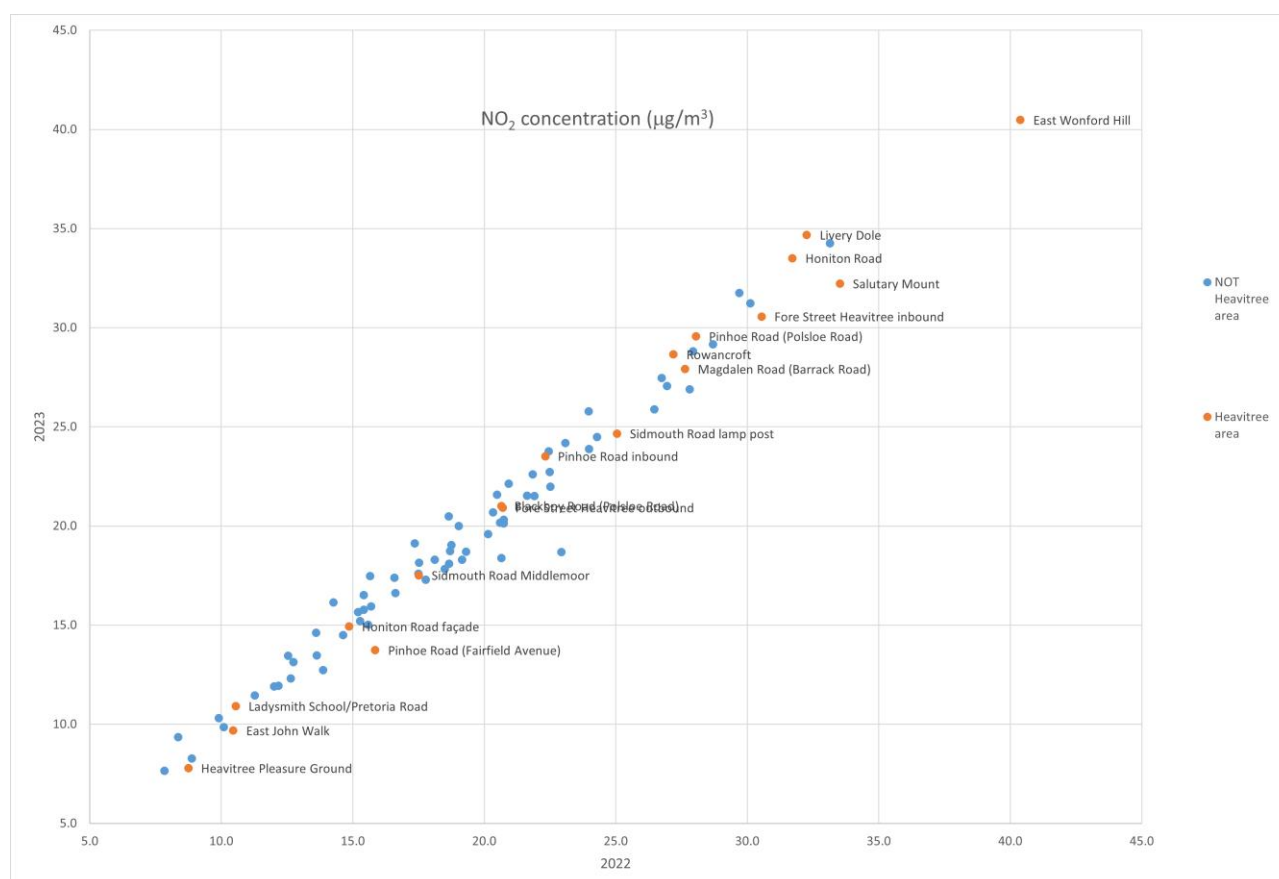
Figure G. 3 - Licensed non-plug-in cars in Exeter

The figure presents the number of diesel cars has been reducing year-on-year since 2019 Q1, with no exception from 2023 to 2024, except a small rise in 2020 Q4.

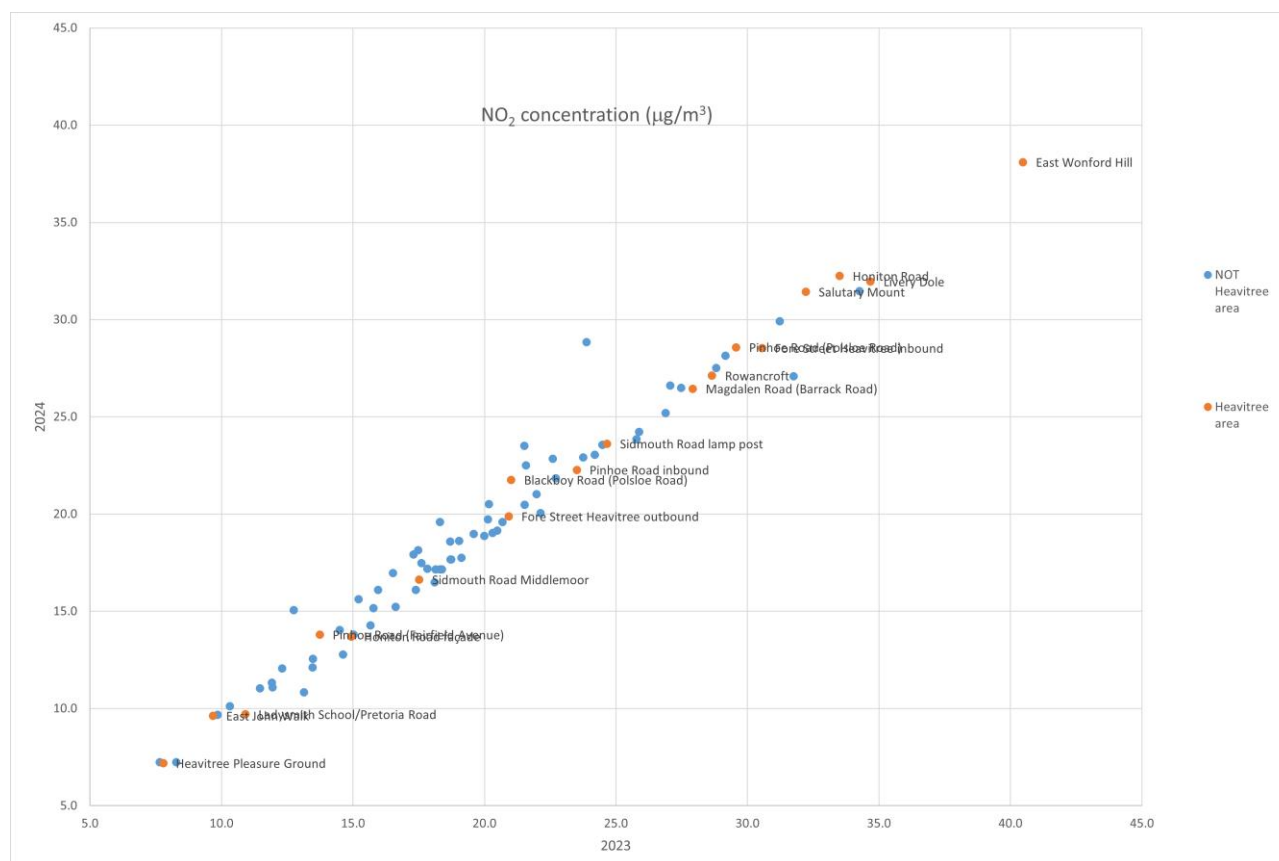
Appendix H: Active Streets Trial – 2024 Assessment

The trial of preventing through traffic in the Heavitree residential area (the scheme) commenced in September 2023 and came to an end in July 2024. The impact of these changes was discussed in the 2024 Annual Status Report. The graph from that report has been reproduced in Figure H.1 below. Figure H.2 shows the same assessment for a comparison of 2023 and 2024 data. The monitoring locations that are close to the Heavitree area are labelled and coloured orange. Those distant from the Heavitree area are coloured blue. All sites in the city have a similar relationship between the ‘with scheme’ and the ‘without scheme’ data periods. There is no suggestion that the areas expected to have been affected by the traffic scheme differ from the remainder of sites.

Figure H. 1 - Comparison of 2022 and 2023 Data



This figure presents the assessment of the trial during 2023.

Figure H. 2 - Comparison of 2023 and 2024 Data

This figure presents the assessment of the trial during 2024.

However it is recognised that a number of factors affect pollution levels on a year-to-year basis, so identifying the impact of the highway changes will never be straightforward. Further assesment was therefore conducted, considering traffic flows as well as air quality data.

The assessment focused on East Wonford Hill (DT57), with three other nearest sites within the Heavitree area for comparison..

Table H.1 presents the year-on-year traffic flows from 2020 to 2024. There was no significant change of the year-on-year work-day traffic flows from 2022 to 2023. However, there were reductions of workday traffic flows on both Heavitree Road and Pinhoe Road (Whipton) in 2024, instead of the expected increases.

Table H. 1 - Year-on-Year Changes of Traffic Flow Data (24-hr average)

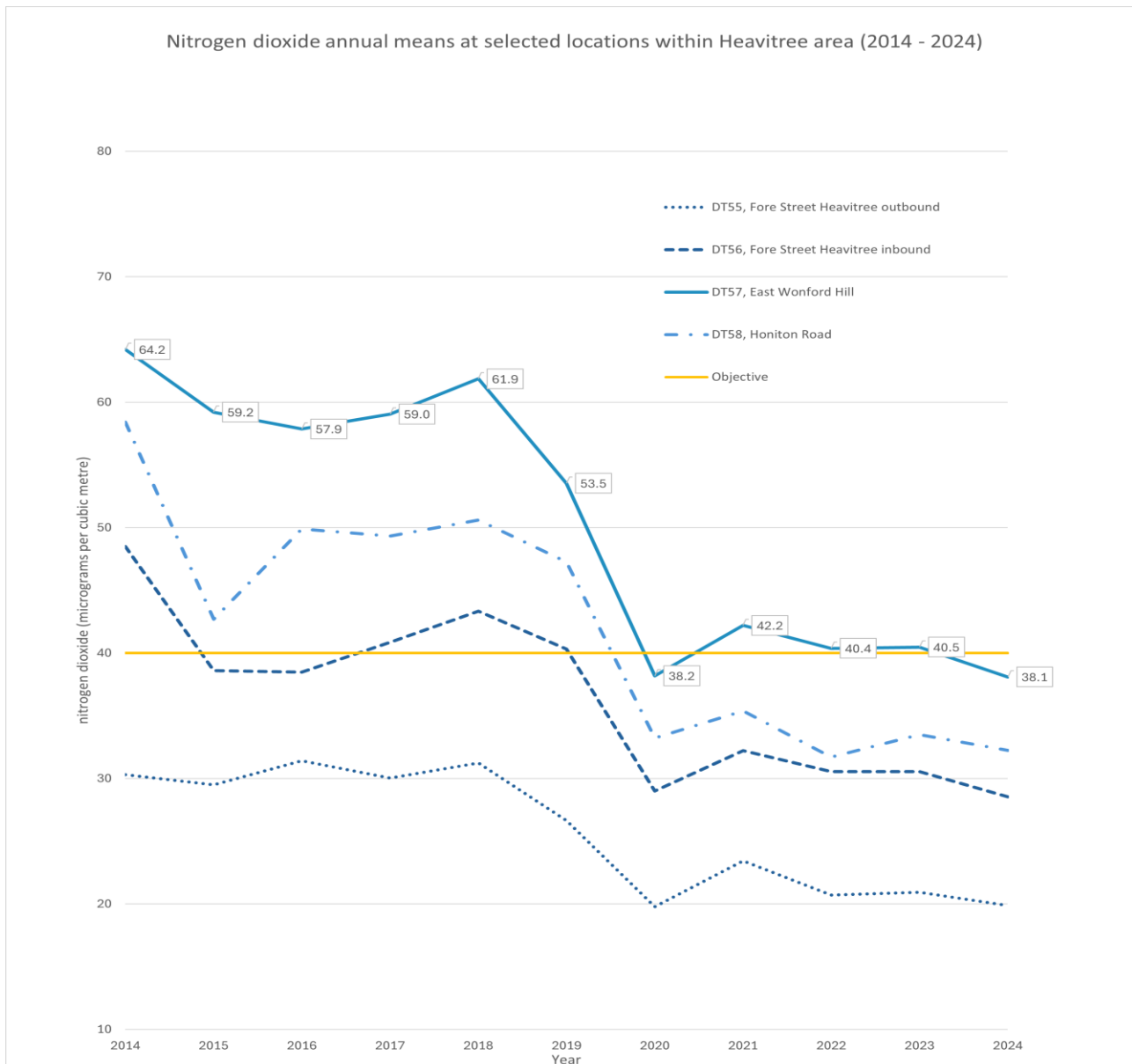
Site Name	% change from 2020 to 2021	% change from 2021 to 2022	% change from 2022 to 2023	% change from 2023 to 2024
Pinhoe Road (Whipton)	10%	12%	-5%	-3%
Heavitree Road	12%	9%	5%	-4%
Honiton Road	5%	7%	3%	1%
Topsham Road (King George)	14%	3%	1%	0%
Alphington St	6%	9%	-4%	4%
Cowick St	9%	5%	-3%	-2%
Total	9%	7%	0%	0%

Table notes:

All traffic flow data only represent average WORK-DAY flows, weekend flows have been excluded.

Therefore, they should not be compared with other published 7-day traffic flows. Similarly, this report is only assessing flows and changes at these six selected locations, if different sites were chosen, different trends could appear.

Figure H.3 presents the nitrogen dioxide annual means at the East Wondford Hill site (DT57) and other three sites along the same traffic corridor, covering a 10-year period, up to 2024. There is no obvious impact of the Heavitree scheme in this data. The long-term continuous downward trends of the annual means should be noted.

Figure H. 3 - Trends at Selected Sites along Heavitree Corridor

This figure presents the nitrogen dioxide annual means at the East Wondford Hill site (DT57) and other three sites along the same traffic corridor, covering a 10-year period, up to 2024.

The potential beneficial effect of the trial on air quality within the residential Heavitree area has been considered, by reviewing the diffusion tube data from DT71 (Heavitree Pleasure Ground). The nitrogen dioxide annual means at this site have been consistently around 8 $\mu\text{g}/\text{m}^3$ during all of the past five years, i.e. 32 $\mu\text{g}/\text{m}^3$ below the 40 $\mu\text{g}/\text{m}^3$ objective.

It is not therefore possible to identify an significant impact of the scheme on local air quality data, either positive or negative. These reductions seen over the period since COVID are considered to be the cumulative effect of on-going influencing factors, these include effects of the measures in the Air Quality Action Plan, new travel & working

behaviours (fewer vehicles on roads, more home and remote working), and ongoing improvements in vehicle emission technologies.

Appendix I: Licensed Vehicles Statistics and Traffic Mix

Year	Diesel	Hybrid electric (petrol)	Other fuels	Petrol	Total
2017 Q1	28.539	0.288	0.385	36.443	65.655
2017 Q2	28.902	0.322	0.391	35.35	64.965
2017 Q3	30.716	0.352	0.482	35.271	66.821
2017 Q4	30.162	0.371	0.684	35.87	67.087
2018 Q1	28.35	0.445	0.629	40.427	69.851
2018 Q2	29.273	0.452	0.685	41.577	71.987
2018 Q3	27.579	0.441	0.56	39.189	67.769
2018 Q4	25.997	0.441	1.018	39.492	66.948
2019 Q1	25.696	0.477	0.98	43.302	70.455
2019 Q2	25.167	0.495	1.045	44.308	71.015
2019 Q3	25.2	0.537	1.218	43.019	69.974
2019 Q4	24.516	0.568	1.126	41.913	68.123
2020 Q1	23.242	0.606	1.364	39.682	64.894
2020 Q2	21.647	0.622	1.087	37.816	61.172
2020 Q3	21.858	0.702	1.197	36.887	60.644
2020 Q4	23.149	0.827	1.456	38.611	64.043
2021 Q1	22.101	1.186	1.942	36.368	61.597
2021 Q2	21.638	1.703	2.411	37.404	63.156
2021 Q3	21.442	1.948	2.574	37.551	63.515
2021 Q4	21.008	1.977	2.552	38.057	63.594
2022 Q1	20.836	2.151	2.615	38.852	64.454
2022 Q2	20.586	2.288	2.504	38.541	63.919
2022 Q3	20.466	2.38	2.627	38.561	64.034
2022 Q4	20.462	2.469	3.344	38.53	64.805
2023 Q1	20.076	2.352	3.667	38.429	64.524
2023 Q2	19.731	2.656	4.006	38.75	65.143
2023 Q3	19.615	2.98	4.619	38.71	65.924
2023 Q4	19.424	3.535	5.253	40.501	68.713
2024 Q1	19.076	4.783	5.05	39.677	68.586

2024 Q2	18.749	4.556	4.496	37.294	65.095
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Data are sourced from Table VEH0105 of [Vehicle licensing statistics data tables - GOV.UK](#). The units of number of vehicles are in thousands. Licensed vehicles at the end of the quarter by body type, fuel type.

"The column headings in this table refer to:

Q1, meaning end of March

Q2, meaning end of June

Q3, meaning end of September

Q4, meaning end of December"

Fuel types are grouped into 4 categories: petrol, diesel, hybrid electric (petrol), and other fuels. Similar data about electric technologies are provided in table VEH0142.

Year	Battery electric cars	Plug-in hybrid electric (petrol) cars
2017 Q1	48	250
2017 Q2	50	247
2017 Q3	53	341
2017 Q4	55	548
2018 Q1	63	492
2018 Q2	70	531
2018 Q3	76	403
2018 Q4	77	867
2019 Q1	88	817
2019 Q2	95	870
2019 Q3	102	1038
2019 Q4	136	904
2020 Q1	182	1082
2020 Q2	175	825
2020 Q3	248	651
2020 Q4	404	617
2021 Q1	389	822
2021 Q2	465	1174
2021 Q3	494	1198
2021 Q4	507	1160
2022 Q1	497	1170
2022 Q2	590	1082
2022 Q3	668	1089
2022 Q4	810	1628
2023 Q1	899	1886
2023 Q2	1104	1953
2023 Q3	1816	1902
2023 Q4	2171	2036
2024 Q1	1994	2082
2024 Q2	2113	1790

Data are sourced from Table VEH0142 of [Vehicle licensing statistics data tables - GOV.UK](#).

Plug-in vehicles (PIVs) are road using vehicles that use a plug-in technology to connect to a source of electricity. Road using vehicles would reasonably be expected to make significant use of the public highway and to be used as a mode of transport. The introduction of these new PIV figures allows for a more direct comparison with electric chargepoint infrastructure and general electricity usage. Some powerful electric bikes have to be registered as mopeds and will be included in the total vehicle numbers.

The column headings in this table refer to:
 Q1, meaning end of March
 Q2, meaning end of June
 Q3, meaning end of September
 Q4, meaning end of December

Honiton Road, between Rifford Road and Sweetbrier Lane junctions					
Vehicle type	03/11/2015	08/11/2018	03/11/2020	07/11/2023	05/11/2024
Motorcycle	1%	1%	1%	1%	1%
Car	84%	84%	84%	85%	85%
LGV	12%	12%	12%	11%	11%
OGV1	1%	1%	1%	1%	1%
OGV2	0%	0%	0%	0%	0%
PSV	2%	2%	2%	2%	2%
Total	21,066	22,268	20,965	20,152	20,387
Fore Street, east of Whipton Lane junction					
Vehicle type	27/09/2018	28/09/2023	12/09/2024		
Motorcycle	1%	1%	1%		
Car	83%	84%	83%		
LGV	11%	10%	12%		
OGV1	2%	1%	1%		
OGV2	0%	1%	0%		
PSV	3%	3%	2%		
Total	17,208	17,128	17,347		
Heavitree Road, west of Polsloe Road junction					
Vehicle type	27/09/2018	28/09/2023	12/09/2024		
Motorcycle	1%	2%	1%		
Car	81%	84%	82%		
LGV	10%	9%	11%		
OGV1	2%	1%	1%		
OGV2	0%	1%	0%		
PSV	6%	4%	4%		
Total	13,408	14,808	14,467		

All data is from Manual Classified Counts, manually enumerated using video footage.

All data is for the 12-hour period 07:00-19:00 on the survey dates.

All data excludes pedestrians and pedal cycles.

LGV = Light Goods Vehicles. Includes all goods vehicles up to 3.5 tonnes gross vehicle weight, including those towing a trailer or caravan.

OGV1 = Other Goods Vehicles 1. Includes all rigid vehicles over 3.5 tonnes gross vehicle weight with two or three axles.

OGV2 = Other Goods Vehicles 2. Includes all rigid vehicles with four or more axles and all articulated vehicles. Also included in this class are OGV1 goods vehicles towing a caravan or trailer.

PSV = Public Service Vehicles (buses and coaches). Includes all public service vehicles and works buses with a gross vehicle weight of 3.5 tonnes or more.

All data is subject to minor discrepancies. Devon County Council has taken reasonable steps to ensure the accuracy of data provided, but cannot guarantee the data is free from errors.

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 National Highways
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

References

- Local Air Quality Management Technical Guidance LAQM.TG22. August 2022. 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.PG22. August 2022. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.
- Chemical hazards and poisons report: Issue 28. June 2022. Published by UK Health Security Agency
- Air Quality Strategy – Framework for Local Authority Delivery. August 2023. Published by Defra.
- Exeter City Council 2019. Exeter Air Quality Action Plan 2019-2023.
- Exeter City Council 2024. Exeter Air Quality Annual Status Report.
- Diffusion Tubes for Ambient NO₂ Monitoring: Practical Guidance for Laboratories and Users 2008.
- National bias adjustment factor spreadsheet.
- National Bus Strategy Bus Services Improvement Plan, Devon County Council, version 3.0. June 2024.
- Liveable Water Lane Supplementary Planning Document Development Framework and Design Code July 2024.
- DVLA Vehicle Licensing Statistics Data Tables. Last updated on 24 September 2024

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Local Authority:	Exeter City Council
Reference:	ASR25-2753
Date of issue	August 2025

Annual Status Report Appraisal Report

The Annual Status Report (ASR) sets out new information on air quality obtained by Exeter City Council (ECC) as part of the Review & Assessment process required under the Environment Act 1995 (as amended by the Environment Act 2021) and subsequent Regulations.

ECC currently has one Air Quality Management Area (AQMA). 'Exeter AQMA 1' was first declared in March 2007 for exceedances of the NO₂ annual mean and NO₂ 1-hour mean Air Quality Objective (AQO). The AQMA was amended in May 2011. ECC have put forward the amendment of the boundary of the AQMA so that the area of the AQMA is reduced to just an area of exceedance on East Wonford Hill (around DT57). ECC states it is anticipated that this will be adopted by the end of March 2026. The current Air Quality Action Plan (AQAP) is due to expire at the end of 2024, but ECC do plan on publishing a new AQAP which focuses on the amended AQMA.

ECC undertook automatic monitoring at two sites, CM1 and CM2, which are both located in AQMA 1. Monitor CM1 measures NO₂, PM₁₀, PM_{2.5} and O₃, whereas CM2 only measures PM₁₀ and PM_{2.5}. The highest NO₂ annual mean concentration recorded was 17.1 µg/m³ at CM1, which did not exceed the annual mean or 1-hour NO₂ AQO. Only CM2 recorded an PM₁₀ annual mean concentration of 14.1 µg/m³ which is below the annual mean AQO. There were no exceedances of the 24-hour mean at either site during 2024. CM2 recorded an PM_{2.5} annual mean concentration of 8.5 µg/m³, which did not exceed the annual mean AQO. There were no exceedances of O₃ in 2024.

ECC undertook non-automatic NO₂ diffusion tube monitoring at 84 sites in 2024. Changes to the monitoring network were made by ECC in 2024; two sites (DT48 and DT74) from 2023 were removed and two sites (DT86 and DT87) were added at the junctions of Magdalen Street, Holloway Street, South Street and Western Way. This was due to significant works to the road layout. The highest NO₂ annual mean concentration recorded was 38.1 µg/m³ at DT57, within AQMA 1, which is within 10% of the AQO. The general trend in NO₂ annual mean concentrations is mixed with 14 monitoring sites recording an increase in concentrations between 2023 and 2024, and the rest recording a decrease in concentrations over the same time scale.

Robust QA/QC procedures have been applied to the 2024 data. ECC used the laboratory Gradko, and the preparation method, 20% TEA in water. All diffusion tube recorded data capture of 75% therefore annualisation was not required. ECC applied a national bias adjustment factor

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of 0.84 to the 2024 monitoring data, but there is a lack of justification and calculations included. Annualisation was required at monitoring site CM1 as a data capture rate of below 75% was recorded for NO₂ and O₃. Appropriate calculations have been included. No automatic NO₂ monitoring locations required distance correction during 2024.

Defra recommends that Directors of Public Health approve draft ASRs. Sign off is not a requirement, however collaboration and consultation with those who have responsibility for Public Health is expected to increase support for measures to improve air quality, with co-benefits for all. Please bear this in mind for the next annual reporting process.

ECC have not highlighted three key measures in yellow in Table 2.2. To help improve the visibility of local authority action to reduce air pollution, three key measures should be highlighted in Table 2.2 will be fed through to UK-AIR. These should be measures the local authority would like to raise awareness of amongst local communities. Please ensure each measure title is succinct and meaningful to the public and includes completion dates. Guidance on how to pitch this information is available [here](#). You should avoid using acronyms in the description of the action or when listing the organisations involved.

On the basis of the evidence provided by the local authority the conclusions reached in the report are **accepted** for all sources and pollutants. Following the completion of this report, Exeter City Council should submit an Annual Status Report in 2026.

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Commentary

The report is well structured, detailed, and provides the information specified in the Guidance. The following comments are designed to help inform future reports:

1. Last year's ASR appraisal comments have been included and addressed. This is commended.
2. ECC have stated that the Diffusion Tube Monitoring Calendar provided was adhered to, which is commended.
3. ECC have not stated whether the diffusion tube data needed distance correcting. This needs to be amended before final submission.
4. An appropriate appendix has been provided about the amendment of the AQMA. This is welcomed and commended.
5. Good quality trend graphs have been included with comparison with the AQO. This is commended.
6. Clear maps of monitoring locations and AQMA boundaries have been included. This is commended.
7. There are few pollutant names that haven't been subscripted e.g NO2 should be NO₂. This should be amended.

This commentary is not designed to deal with every aspect of the report. It highlights a number of issues that should help the local authority either in completing the Annual Status Report adequately (if required) or in carrying out future Review & Assessment work.

Issues specifically related to this appraisal can be followed up by returning the attached comment form to Defra, Welsh Government, Scottish Government or DOE.

For any other queries please contact the Local Air Quality Management Helpdesk:
 Telephone: 0800 0327 953
 Email: LAQMHelpdesk@bureauveritas.com

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Equality Impact Assessment: Air Quality Annual Status Report and revision of the Air Quality Management Area (AQMA)

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.

Committee name & date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
Executive Council	Air Quality Annual Status Report and revision of the Air Quality Management Area (AQMA)	Noting the contents of the Annual Status Report. That Executive Committee approves the consultation on	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.

		revising the Air Quality Management Area that will run from 4 November 2025 until 16 January 2026.	Improving air quality will benefit all those living, working and visiting the city. In particular it will have a positive impact upon those with disabilities such as breathing and respiratory issues, those with vulnerabilities such as children and the elderly and those who are pregnant.
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Factors to consider in the assessment: For each of the groups below, an assessment has been made on whether the proposed decision will have a **positive, negative or neutral impact**. This 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		There is no evidence that this will impact on any specific person based 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.	Positive	Medium	Improving air quality in Exeter and reducing exposure will assist in protecting residents with breathing and respiratory problems. Providing information about air quality will enable individuals to make informed decisions to protect personal health.

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
			<p>The monitoring sites target local areas of potential concern to inform communities.</p> <p>Consultees will have the opportunity to respond by electronic communication, telephone or a personal visit (in a case with the proposed new AQMA area)</p>
Sex/Gender	Neutral		There is no evidence that this will impact on any specific person based on this characteristic.
Gender reassignment	Neutral		There is no evidence that this will impact on any specific person based on this characteristic.
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	Neutral		There is no evidence that this will impact on any specific person based on this characteristic.
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Neutral		There is no evidence that this will impact on any specific person based 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).	Positive	Medium	<p>Poor air quality affects the most vulnerable people in Exeter therefore fulfilling our statutory duties with respect to air quality is likely to have a positive health impact on children and the elderly.</p> <p>Actions to improve air quality and provide information may assist individuals in taking action to protect their own health, making informed decisions on transport, walking routes and indoor air quality will have a positive impact.</p>

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
			Consultees will have the opportunity to respond by electronic communication, telephone or a personal visit (in a case with the proposed new AQMA area)
Pregnancy and maternity including new and breast feeding mothers	Positive	Medium	Improving air quality will positively impact positively on those who are pregnant.
Marriage and civil partnership status	Neutral		There is no evidence that this will impact on any specific person based on this characteristic.

Actions identified that will mitigate any negative impacts and/or promote inclusion

The Council will consider Equalities and protected characteristics at all stages of any consultation process.

The consultation process will ensure that all persons dealt with receive fair and equitable treatment irrespective of their background or protected characteristics, as defined by the Equality Act 2010.

Officer: Simon Lane, Head of Environment and Waste

Date: July 2025

REPORT TO EXECUTIVE

Date of Meeting: 4 November 2025

REPORT TO COUNCIL

Date of Meeting: 9 December 2025

Report of: Monitoring Officer

Title: Proposed Policy of the Council for an Indemnity to Members and Officers

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 This report outlines the proposed indemnity to be granted under Appendix 1 to Members and Officers, including former Members and Officers. This report explains the Council's power to grant an indemnity, the benefits of it and the proposed terms of the indemnity granted at Appendix 1.

2. Recommendations:

2.1 That Executive recommends to Council that it grants:

2.1.1 the indemnity at Appendix 1 to Officers and Members and the policy is included in Part IV (Codes and Protocols) of the Council's constitution; and

2.1.2 a standing delegated authority to the Monitoring Officer, in consultation with the s151 Officer and the Leader of the Council:

2.1.2.1 to determine whether to meet the cost of any officer or member liability or loss from the Council's own resources where the Council's own insurance policy does not cover such a liability or loss; and

2.1.2.2 to agree and implement any necessary amendments to the indemnity policy where such amendments are required to reflect changes in legislation, insurance arrangements or best practice, provided that any substantive policy changes are reported to Council for approval.

3. Reasons for the recommendation:

Issue	Solution
The current position of Exeter City Council regarding an indemnity to Members and Officers is unclear, and	Indemnity granted to Members and Officers at Appendix 1

a policy is not in place to make clear the terms of the indemnity.	
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4. What are the resource implications including non-financial resources

4.1 The resource implications of the proposed indemnity are that the Council will need to maintain its policy of insurance in place to cover indemnifying members and officers. The current insurance policy with Zurich covers the items covered by the indemnity policy. This is subject to payment of excess each time a claim is made. This is detailed in section 8 of this report.

5. Section 151 Officer comments:

5.1 The Council has official indemnity insurance as part of its overall insurance cover. This is a standard part of the insurance package provided to the Council.

6. What are the legal aspects?

6.1 Due to the statutory protections in place, individual members and officers of local authorities are not generally liable for the authority's acts or omissions:

- The Public Health Act 1875 provides councillors and officers, when acting in the course of their duties and in good faith, with statutory immunity and are not personally liable for the actions they take.
- The Local Government (Miscellaneous Provisions) Act 1976 provides further statutory immunity from personal liability, allowing members and officers to be indemnified from the general fund in relation to the performance of any of their functions, where they act bona fide, for proper purposes and without being negligent.

6.2 These statutory protections apply to functions of a local authority. It does not apply to members or officers sitting on outside bodies.

6.3 The Local Government Act 2000 conferred additional powers on local authorities to grant general indemnities to officers and members. The Local Authorities (Indemnities for Members and Officers) Order 2004 ('the 2004 Order'), which gave effect to these provisions, provides that a Local Authority in England has the power to grant indemnities to officers and members and/or take out insurance to protect them against the costs for incurring liability for acts which are carried out in the course of their official duties.

6.4 The power to grant such an indemnity under the 2004 Order can include cases where a member or officer exercises their functions in a capacity other than that of a member or officer of the authority, for example, as a director of a company or member of an outside body.

6.5 A local authority has the discretion to decide when to use the discretionary power of granting indemnities and the extent of those indemnities and/or insurance, as well as its terms. However, this discretion is subject to limitations: A local authority may not indemnify a member or officer in relation to:

- Any act or failure to act which constitutes a criminal offence (including matters that may give rise to a civil claim which also constitutes a criminal offence). However, an indemnity can be granted to cover criminal defence costs;
- Any act or failure to act which arises as a result of fraud or other deliberate wrongdoing or recklessness; or
- The cost of pursuing a defamation claim.

6.6 It should be noted that if the misconduct of a councillor causes a loss to the council, that councillor may be liable to make good such a loss. Also, should an indemnity be granted to an officer or member to cover the legal costs of defending criminal proceedings, such an indemnity must include sufficient provisions for this to be repaid to the Council should the trial result in a conviction.

7. Monitoring Officer's comments:

7.1 The Council has powers under the 2004 Order to provide indemnities to Members and Officers. The proposed indemnity policy sets out how the indemnity is to be applied and the limits on that indemnity.

The proposed delegation to the Monitoring Officer, in consultation with the Section 151 Officer and the Leader of the Council, provides a flexibility to deal with any exceptional cases not covered by insurance.

Overall, the policy will strengthen the Council's governance arrangements and provide reassurance to Members and Officers in the proper discharge of their duties.

8. Equality Act 2010 (The Act)

8.1 In recommending this proposal, no potential impact has been identified on people with protected characteristics as determined by the Act because:

- The report relates to internal governance and procedural changes to the Council's Constitution and does not affect service delivery or public access to services.
- The changes support principles of transparency, accountability, and inclusion and are designed to improve overall governance without disadvantaging any protected groups.

9. Carbon Footprint (Environmental) Implications:

9.1 No direct carbon/environmental impacts arising from the recommendations.

10. Report details:

10.1 The Council's Policy on indemnities to members and officers acting on outside bodies and guidance to members was last reviewed by Executive on 4th October 2011. In this report to Executive, a policy on indemnities from April 1998 was referred to. However, in preparation of this report, it has not been possible to obtain a copy of this policy from 1998. Furthermore, this policy, if still in place, is likely out of date as it pre-dates the 2004 Order, where the Council's discretion to grant an indemnity now derives.

10.2 The purpose of the proposed indemnity is to support those providing services, carrying out a role and making decisions on behalf of the Council. An indemnity will

ensure that where a Member or Officer carries out their duties in good faith, with a reasonable belief to be acting within their powers, they will be protected from incurring any personal liability. The protection from personal liability extends to officers and members when appointed to outside bodies, acting as a director of a company or in connection with regulatory roles (e.g. acting as the Personal Management Licence Holder (PMLH) for the purposes of the Exeter Community Lottery).

10.3 The protection under the indemnity allows for a positive environment of working, with individuals able to carry out their role without the fear that they may incur personal financial or legal risk. This enables effective and confident discharge of their duties.

10.4 Having in place an indemnity, rather than relying solely on a policy of insurance provides the Council with flexibility and control over the terms for which officers or members are protected and can be adapted to the specific needs of the Council. The Council may not have such discretion over the terms under an insurance policy.

10.5 The proposed terms of the Indemnity to members and officers is available at Appendix 1.

10.6 The Indemnity proposed shall act as the basis of the protection for Members and Officers against incurring liability, setting out the terms of the agreement for this protection, including the extent and limitations, the obligations of Members and Officers, the conditions for which it is subject to and the powers of the Monitoring Officer.

10.7 To provide for the payments made under the Indemnity, the Council must have in place a policy of insurance. The Council's current insurance policy with Zurich expiring on 31st March 2026 includes a £5,000 excess applicable to each individual claim, whereby the Council funds the first £5,000 of any one loss prior to insurer contribution. This excess applies cumulatively across all claims up to an annual aggregate limit of £50,000, after which the insurer assumes full liability for subsequent valid claims during the remainder of the policy year. The overall limit of indemnity under the policy is £10 million.

10.8 There may be instances when such insurance does not cover every eventuality, but a power has been retained it is at the council's discretion to approve use of Council funds to indemnify the officer and/or member.

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

11.1 The proposed indemnity directly supports the delivery of the Council's Corporate Plan 2025–2028, particularly the priority of maintaining a well-run Council. By putting in place such an indemnity will contribute to a more open, transparent and accountable local authority. The changes also reflect a commitment to good governance which is a key element outlined in the Corporate Plan.

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

12.1 There is a risk of confusion or inconsistent application of the new procedures. This will be mitigated through clear communication, updated guidance and support from Democratic Services and the Monitoring Officer to ensure smooth implementation.

13. Are there any other options?

13.1 The Council could choose to put in place a policy of insurance to cover officer and member liability, rather than an indemnity. As discussed under para 1, this would limit the Council's control over the terms and the discretion to adapt to the specific needs of the Council. The proposed indemnity at Appendix 1 reflects best practice.

Simon Copper, Head of Legal & Democratic Services and Monitoring Officer

Author: Simon Curran, Planning Lawyer

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

Background papers used in compiling this report:-

None

Contact for enquires:
Democratic Services (Committees)
Room 2.35
01392 265275

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Appendix 1

Indemnity Policy for Officers and Members

1. Indemnity

An indemnity ("**the Indemnity**") is granted by Exeter City Council ("**the Council**") to any elected member or officer ("**the Individual**"), subject to the conditions and administration set out in this policy against any:

- a) claim, liability, loss, damage, and/or award of damages; or
- b) reasonable costs for legal advice or representation, where they are subject to civil or criminal proceedings

arising from actions or failures to act through their official duties as an elected member or officer.

The Indemnity is subject to the limitations and conditions contained within this document.

2. Extent of the Indemnity

The Indemnity shall only cover instances where the Individual has acted in good faith and reasonably believed that they were acting within their authority. To determine this, the Council shall consider any advice the Individual had received in respect of their authority or generally about their powers.

The Indemnity shall cover the actual cost or expense incurred by the Individual. Evidence of the actual cost or expense must be provided by the Individual to the satisfaction of the Council's Monitoring Officer.

The Indemnity shall cover criminal defence costs, unless a conviction results, in which case the Individual shall be liable to repay the costs in full to the Council. Any fine payable due to a criminal conviction will not be covered by the Indemnity.

The Indemnity shall extend to where an Individual has been appointed to an external body or organisation or to a regulatory role on behalf of the Council, such appointment having been made at the request of the Council and through the course of the Individual's official duties.

3. Limit of the Indemnity

The Indemnity will not cover:

- a) any act or failure to act which constitutes a criminal offence (including matters that may give rise to a civil claim which also constitutes a criminal offence).
- b) any act or failure to act which arises as a result of fraud or other deliberate wrongdoing or recklessness;
- c) the cost of pursuing a defamation claim;
- d) any loss or expense of which reimbursement could be sought from another source, including a policy of insurance;
- e) civil action brought by an officer arising out of their employment with the Council, unless agreed with the Council's Monitoring Officer;
- f) any legal fees incurred by an elected member following a complaint against them for failing to comply with the Code of Conduct for Councillors/Members;

- g) any acts, or omissions, of a member as a result of a position they have in their personal capacity with an outside body, which was not an appointment by the Council;
- h) any instance where the Individual has attempted to negotiate, or negotiated a settlement or admitted liability for a claim within the scope of this Indemnity, without the consent of the Council's Monitoring Officer.

4. Conditions

The Council's Monitoring Officer shall determine the application of this Indemnity in individual cases and may attach reasonable conditions to its operation, including but not limited to the following:

- a) The Individual must notify the Council's Monitoring Officer promptly of any claim or liability for which the Indemnity is sought;
- b) The Individual must provide the Council's Monitoring Officer and insurers with information requested, including any legal advice they have received in relation to the claim;
- c) The Individual must not agree any settlement of all or part of the claim without first obtaining the consent of the Council's Monitoring Officer;
- d) Any amount payable to the Individual under this indemnity may be limited to a set amount, a specific act of legal representation, legal advice on a specific issue or a particular stage in proceedings;
- e) Any payment for legal fees may be limited to the rates under National Band 2 of the Government's Guideline Hourly Rates available at: < [Solicitors' guideline hourly rates - GOV.UK](#) > ;
- f) Should a payment made under this Indemnity relate to a criminal investigation or proceedings against the Individual, it shall be repaid to the Council if the Individual is convicted of an offence;
- g) The Council may require the Individual to provide security—such as a legal charge over property owned by the Individual—where it is reasonably anticipated that the Individual may become liable to repay any amount paid by the Council under this Indemnity;
- h) The Individual shall exhaust any other means available to them for meeting legal costs (such as a policy of insurance they may hold); and
- i) Any other reasonable conditions.

5. Obligations of Officers and Members

Any Individual who intends to rely upon this Indemnity must notify the Council's Monitoring Officer as soon as they become aware of any claim—whether against the Council or them as an Individual—that could result in a financial loss to the Council.

Following notification to the Council's Monitoring Officer, the Individual must provide any information and/or assistance to the Council throughout the relevant legal proceedings. This information and/or assistance may include the provision of written witness statements and appearing in Court to give oral evidence.

6. Insurance

The Council will have in place a policy of Insurance to provide cover for the Indemnity. In any case where a liability or loss is not covered by the Council's insurance arrangements, the Council may, at its discretion, agree to meet the cost of any indemnity from its own

resources with any such decision based on the principles and conditions contained in this policy.

7. Monitoring Officer Decision

The Council's Monitoring Officer is responsible for determining the application and operation of this policy to individual cases. In the event of a dispute concerning the decision of the Monitoring Officer in applying this policy, the matter shall be referred to the Chief Executive for determination.

Should the dispute be brought by the Chief Executive, the matter will be referred to the Section 151 Officer for determination.

Simon Copper
Monitoring Officer
21 October 2025

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