

The Environment Act 1995 has placed an obligation on local authorities to consult with local stakeholders as part of their air quality management process. This represents one of the largest locally based environmental consultation initiatives undertaken in the UK. This emphasis on including non-expert views and opinions reflects a growing trend in environmental decision-making that acknowledges the need for local networks of communities to be involved in local air quality management.

The aim of this research was to investigate the nature, scope and effectiveness of local authority air quality management consultation approaches; develop methods and models of better practice; and disseminate our findings to a broad audience. We found that local authorities are faced with a series of substantive challenges in contacting, engaging with, and incorporating the views of their diverse statutory and non-statutory constituencies within the local air quality management (LAQM) decision-making process.

Local policy and organisational innovation struggled to adapt to complex systems with multiple goals that comprise cross-cutting and multi-level governance. For example an authority, whose duties involved reviewing the polluting effects of a major road near a population centre, expressed concern about their ability to actually do anything about the problem. Here, local authorities perceived that they were not 'free actors' – they were bound by structural constraints, and are self-aware of the relative limitations of current LAQM consultation practices and processes. This may be because poor local air quality tends to be perceived as a systemic problem with no easy solutions.

Although most authorities attempted to consult both statutory and non-statutory stakeholders on LAQM issues; there exists a distinct emphasis, even bias, towards engagement with formal, institutional, and expert statutory consultees. Similarly, the study confirms that a broad range of local authorities experienced significant difficulties in integrating community consultation outcomes in any subsequent LAQM decision-making process - in particular, how to weight, report, and embed responses in Air Quality Action Plans. Many of these difficulties were explained by some authorities in terms of a relative democratic deficit: they expressed the concern that current LAQM consultation practice was perceived as a '*tick-box exercise*' by local communities, rather than an example of real participatory democracy. This is important in the context of more widely held concerns about whether consultation unfairly levers community expectations about what LAQM can achieve. In this context, some authorities felt subject to a '*piggy in the middle*' effect, sandwiched between central government and local communities.

A lack of expertise on how to do LAQM consultation was also identified, as most local authorities had never received any formal training. This is perhaps unsurprising given the range of roles and duties that environmental health departments (the key unit here) are expected to perform. In the context of this gap in local authority expertise and ramping policy emphasis on further stakeholder consultation, we have developed a practical 'Steps to Better Practice' Guidance document for local authorities based on our research¹.

Our findings suggest that there is no 'off the shelf' resolution to the deliberative dilemma. Although authorities genuinely attempt to engage with all stakeholders, current

¹ Available at: www.uwe.ac.uk/aqm/esrc

consultation processes are not working as well as they could. This may imply a re-think on the form and function of LAQM consultation processes.

However, one significant ‘outlier’ case study does provide evidence to suggest that a particular integrative form of consultation – which we have called ‘embedded engagement’ – goes some way to resolving the differences between theory and practical experience by providing for better practice multi-stakeholder involvement. Sheffield City Council, a northern metropolitan authority, was able to knit together formal (top-down) and informal (bottom-up) networks within their consultation process. This work was enabled via the development of initial ‘options scoping’ at ward level. Community ‘Area Panels’ were formed, and ‘Clean Air Partnerships’ comprising both statutory (expert) and non-statutory (community) members were set up. External air quality and consultation facilitation consultants were employed to bolster the authority’s capabilities. Under the ‘Sheffield Development Framework’, the ‘East End Strategy Group’ was formed, comprising local communities, businesses and the local authority. In this context, the ‘East End Quality of Life Initiative’ was able to directly engage as formal LAQM consultees – this example of ‘joint-working’ is significant as this body represents an amalgam of constituencies. Sheffield’s ‘Diffusion Tube Project’, led by an outreach worker, provides a good example of how to empower and engage communities affected by poor air quality. He noted a ‘perceived lack of trust’ in local authority monitoring by the residents of Tinsley, a Housing Market Renewal Area and Health Action Zone adjacent to the M1 motorway. In tandem with the residents of Tinsley and the local authority, he set up a community-based diffusion tube monitoring experiment. A project steering group was formed comprising local residents, local authority built environment and transport planners, and environmental health officers. The idea was to empower the community to monitor on a do-it-yourself basis in order to better own the problem. This process engaged the interest of the local media who reported the progress of the project. The experiment was funded by formal resource structures (the project was funded by the Primary Care Trust and Defra) and included formal local authority and informal local community components. This allowed for a clear broad-based stakeholder constituency to thrive and impact on LAQM in that area. In other words the experiment facilitated better two-way communication concerning LAQM in Tinsley. Importantly, the project provided real leverage on planning decisions in that area, thereby demonstrating a critical link between consultation and decision-making processes.

In sum, the strategic co-ordination of a range of engagement initiatives contributed to a more effective LAQM process. Embedding engagement practices within the consultation process built local community participation, and allowed for a clearer broad-based stakeholder constituency to thrive and impact on LAQM in that area. Perhaps the most important conclusion to draw from this example concerns the way that the local authority integrated its consultation process in a holistic way within their LAQM process. Here the ‘value-added’ parts of the process, for all stakeholders, are located in the negotiation spaces that are opened up through early and embedded engagement leading to a more integrated consultation process.