Steps to Better Practice

Guidance for Local Authorities on LAQM Consultation



University of the West of England







How to Access this Guidance

This 'Steps to Better Practice' Guidance document and a Report, drawing on findings from an ESRC 'Science in Society' Programme project 'Consultation as Science Communication? The case of Local Air Quality Management' (ESRC Award Reference RES-151-25-0044), can both be found at http://www.uwe.ac.uk/agm/esrc/.

University of the West of England Air Quality Management Resource Centre, Faculty of Applied Sciences, Bristol, BS16 1QY Telephone: 0117 32 83825 Fax: 0117 32 82132 Contact: Professor Jim Longhurst



UWE 2006

Contents

1. BACKGROUND	4
1.1 Opportunities for LAQM Consultation	4
2. HOW THIS GUIDANCE HAS BEEN PRODUCED?	5
2.1 Framing the Big Picture	6
2.2 Testing the Understanding	6
2.3 Regional Research Dissemination and Feedback Workshops	7
3. PURPOSE OF THIS GUIDANCE	8
4. LAQM CONSULTATION ISSUES	10
5. 'EMBEDDED ENGAGEMENT': a 'better practice' LAQM con	nsultation
parameter	12
6. INTEGRATED CONSULTATION	14
7. RECOMMENDATIONS TO DEFRA	16
8. 10 STEPS TO BETTER LAQM CONSULTATION	18
8.1 'Joined-up' Work: Internal and External Statutory Sta	akeholder
Communication	
8.2 Resourcing Consultation	21
8.3 'Up-stream' Early Engagement	
8.4 Providing Information	24
8.5 'Embedded' Engagement	25
8.6 Linking Statutory and Non-Statutory Networks	27
8.7 Maintaining Engagement	28
8.8 Delivering Consultation Outputs	29
8.9 Evaluation and Review	
8.10 Iterate	
9. CONCLUSION	
APPENDIX 1 - CONSULTATION OPPORTUNITIES	35
APPENDIX 2 - PROJECT STEERING GROUP	36

1. BACKGROUND

The Environment Act 1995 has placed an obligation on local authorities to consult with relevant statutory and non-statutory 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. The Environment Act itself specifies statutory stakeholders who must be consulted, but there's limited guidance given on identifying and engaging with non-statutory stakeholders. 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. However, as Involve (2005) point out:

"Despite the enormous growth of participatory practice and theory, there is still little shared understanding among all those involved'.

1.1 Opportunities for LAQM Consultation

While UK policy emphasises the importance of local authority involvement and engagement with a broad range of statutory and non-statutory community stakeholders, the reality of such engagement is often more complex and uncertain. Nevertheless, it is clear that within each round of local air quality management (LAQM) Review and Assessment (R & A), and between each R & A, there are many opportunities for consultation to take place (see Appendix 1).

2. HOW THIS GUIDANCE HAS BEEN PRODUCED?

The guidance results from a 2-year ESRC funded research project carried out by researchers from the University of the West of England (UWE), Bristol Air Quality Management Resource Centre and Graphic Science Unit and the Geography Department at Hull University; with the aim of investigating the nature, scope and effectiveness of local authority air quality management consultation approaches undertaken by English local authorities with respect to statutory and non-statutory stakeholders.

In order to achieve this aim, we constructed a questionnaire survey to investigate how local authorities go about consulting with their communities on LAQM. This was evaluated by two local authorities (Bristol City Council and the London Borough of Ealing) - data from these two authorities also contributed to our research. A pilot survey was then sent out to all local authorities in Scotland and Northern Ireland as they were not part of the main survey. After further re-evaluation, a final questionnaire survey was sent out to all 353 local authorities in England. 150 local authorities replied to the survey, giving a response rate of 42%. Data from the survey allowed for the construction of a map of approaches used by local authorities in the LAQM consultation process, and responses were statistically analysed (for further details see <u>http://www.uwe.ac.uk/aqm/esrc/</u>). Following a rigorous case study selection criteria, eleven case studies were chosen to look at the subject in greater detail. Case study research involved in-depth interviews with environmental health officers tasked with carrying out LAQM consultation in their authority (for further details see http://www.uwe.ac.uk/agm/esrc/).

2.1 Framing the Big Picture

In framing the big picture, the research team identified and engaged with a network of key LAQM and science communication, science and technology studies (STS) stakeholders and potential research users. These included representatives from a broad range of air quality consultancies; the Department for Environment Food and Rural Affairs (Defra); Department of Trade and Industry (Dti); Environment Agency (EA); Local Government Association (LGA); Local Government Information Unit (LGIU); Office of Science and Technology (OST); a set of STS academics; and an extensive range of local authorities throughout the UK.

We then established a Project Steering Group in order to maintain contact with those communities, comprising representatives from the local authorities, Environment Agency, National Society for Clean Air and Environmental Protection (NSCA), Hull University, and UWE. Input from the steering group was sought throughout the research process (see Appendix 2 for details of PSG members).

2.2 Testing the Understanding

Once we consulted with key networks, and completed the survey and case study elements of the project, the research team ran four regional research dissemination and feedback workshops in order to test our understanding of the big picture, and the finer-grained details of our research results.

2.3 Regional Research Dissemination and Feedback Workshops

- SOUTH WEST 4th April 2006, UWE, Faculty Applied Sciences, Bristol.
- NORTH EAST 7th April 2006, Sheffield Hallam University, Sheffield.
- MIDLANDS 25th April 2006, Shakespeare Institute (Birmingham University), Stratford-upon-Avon.
- SOUTH EAST 4th May 2006, Defra, Ashdown House, London.

The workshops were well attended by a broad section of local authority and governmental department personnel, and were designed as a forum to share and exchange experiences and ideas on air quality management consultation - an opportunity to learn from, and reflect on, local authority experience of consultation processes (for further details see http://www.uwe.ac.uk/agm/esrc/). The workshops were facilitated by the research team and representatives from the Project Steering Group. The main purpose of the workshops was to 'reality check' our findings with every local authority in England who were invited to attend on a regional basis. We did this by presenting our findings and seeking constructive engagement and feedback. During the course of the workshops it became clear that our results clearly resonated with the experience of local authorities present. In other words, our findings matched the 'lived experience' of local authorities consultation practices.

3. PURPOSE OF THIS GUIDANCE

The purpose of this 'steps to better practice' guidance is to provide indicative rather than prescriptive advice to local authorities involved in LAQM consultation. This is because it became clear through the research project that underpins the guidance that there is no simple 'one-stop' set of answers. Also, importantly, local authorities told us that they needed flexible rather than rigid advice that acknowledged the diversity of local authority powers and responsibilities in LAQM consultation processes. This is because differing local authorities face differing air quality and engagement challenges with differing sets of resources to draw on. For example, smaller rural district councils may have very different pollution control capacities, air quality problems, and access to financial or training resources when compared to larger metropolitan councils.

Our guidance attempts to acknowledge the constructive nature of this diversity by recommending a flexible set of responses to the LAQM consultation dilemma. Implicit in this way of doing things is understanding and acknowledging the positive differences between statutory and non-statutory stakeholders.

In this context, the guidance is not a one-size-fits-all 'how to' guide to consultation – the National Society for Clean Air has already covered this in 'Consultation for Local Air Quality Management' (NSCA, 1999).

Nor do we set out the range of participatory mechanisms that can be employed to engage people – 'Involve' have rehearsed these at length in 'People and Participation' (Involve, 2005).

Neither is it an in-depth analysis of the state of deliberative democracy in the UK – Demos have discussed this in 'Start with People' (2005). Rather, the guidance is designed to:

e People & Participation





- Identify the general issues that confront local authorities in carrying out LAQM consultation.
- Give a more detailed account of one of those issues the novel mode of 'embedded engagement', consisting of non-statutory stakeholder partnerships which interact with local authority and other formal stakeholders groups through the consultation process.
- Introduce the concept of 'integrated consultation' based on the work of 'embedded engagement' facilitated by 'local champions', and foregrounding the importance of 'upstream' or early engagement.

We then set out 'ten steps to better practice' for LAQM consultation based on our research, and work through the challenges and opportunities that cohere to each step. Our intention is to provide a more holistic over-view of the LAQM consultation process, acknowledging both the concerns and benefits that confront local authorities as they seek to engage their statutory and nonstatutory stakeholders in an effort to improve local air quality. We have made a point of keeping our guidance as simple and flexible as possible - this is because we have found that the LAQM consultation framework we recommend is most successful when adapted to local circumstances.

4. LAQM CONSULTATION ISSUES



Photo – Tim Chatterton

Whereas the goal in the technical community is to find the one best solution to a problem, the facilitation of public debate has a broader function - the process is not only to find a workable decision, but also to find one that holds the participants together. Here, the effective decision is the one that improves the capacity to make better decisions in the future.

In order to be able to make flexible suggestions for better LAQM consultation practice, we first must acknowledge and 'up-front' the very real experiential concerns of local authorities engaged in this process. This is because our findings suggest that local authorities are not 'free actors' here. They are bound by systemic and practical constraints, and are self-aware of the relative limitations of current LAQM consultation practices and processes.

In carrying out LAQM consultation, local authorities are faced with a series of real issues. These include a series of 'how to' problems:

- How to 'join up' internal communications processes within the authority.
- How to build communication between local authorities, and statutory stakeholders.
- How to resource the consultation process.
- How to facilitate community engagement within the LAQM consultation process.
- How to deliver consultation outcomes.
- How to evaluate the success of consultation.
- How to iterate through successive LAQM Rounds.

All these issues are deeply inter-linked. Although our findings suggest that there are no simple solutions to this set of problems, we have evolved a set of better practice parameters based on our research

Given the importance of stakeholder buy-in to better decision-making, we focus on embedding community engagement in the next section. In our view, getting this part of the process properly constructed and operating is a necessary condition for good air quality consultation.

5. 'EMBEDDED ENGAGEMENT': a 'better practice' LAQM consultation parameter



Photo - courtesy of 'Care4air'

Amongst a reasonably large set of 'good practice' LAQM consultation case study examples, a northern metropolitan city council stood out as an example of 'better practice'. Although the authority provided an information-rich and inter-active web-site, the key component of its success was their ability to knit together formal statutory (top-down) and informal non-statutory (bottom-up) LAQM stakeholder networks. 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 nonstatutory (community) members were set up. External air quality and consultation facilitation consultants were employed to bolster the authority's capabilities. A 'Strategy Group' was formed, comprising local communities, businesses and the local authority. In this context, this initiative was able to directly engage as formal LAQM consultees – this example of 'joint-working' is significant as this body represents a mix of constituencies.

This community engagement 'vehicle' was supplemented by a 'pollution measurement partnership' which involved a local community estimating local air quality by carrying out a diffusion tube monitoring campaign. The project, led by an outreach worker, provides a good example of how to empower and engage communities affected by poor air quality. The project was initially driven by a 'perceived lack of trust' in local authority monitoring by residents of a Housing Market Renewal Area and Health Action Zone adjacent to a motorway. A Project Steering Group was formed comprising of locals, 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 an element of local air quality 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 able to draw down central government funding and mobilise local resources from a Primary Care Trust.

In sum, the strategic co-ordination of a range of engagement initiatives contributed to a more effective LAQM consultation process. Embedding engagement practices within the consultation process capacity-built local community participation, and 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 and participation consultation processes concerning LAQM. Importantly, the project demonstrates that a clear link can be made between the consultation and decision-making processes. 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.

13

6. INTEGRATED CONSULTATION



Photo – Simon Spokes

The 'embedded' consultation engagement case study demonstrates that effective LAQM consultation can be done, and results from a holistic set of pre-conditions. Consultation works well when non-statutory stakeholders (informal networks) are empowered to interact with statutory stakeholders (formal networks). This interaction is best enabled by skilled local community, authority and council advocates. This process works well when it is adequately resourced and is carried out over a reasonably extended time-frame. Critical to this is the point at which local authorities consult. In this context we have evolved a set of parameters that, taken as a whole, help to define an integrated LAQM consultation process:

- Stakeholder engagement should be early and 'upstream', and have the capacity to effect real change via a clear association with the LAQM decision-making process.
- Stakeholders should be well-informed, be aware of the opportunities to participate and, optimally, be able to engage over an extended time-span.
- Local authorities and their stakeholders commitment to involve in the process are best enabled via experienced and effective LAQM advocates or 'local champions' (within the community, local authority, and council).
- Consultation works well when local authorities and their communities are able to access adequate resources levered by relevant funding streams.
- Trust in the process can be built through 'co-work' exercises. For example LAQM knowledge can be co-produced via 'pollution measurement partnerships' (between the community and the local authority).

7. RECOMMENDATIONS TO DEFRA



Photo – Tim Chatterton

In the light of the findings of the ESRC 'Science in Society' research project we suggested to Defra that attention is given to reconsidering the form (nature and timing) of LAQM consultation, and the way it is taken into account within the policy process. We are pleased that, in principle, Defra are in accord with our findings.

Recommendation 1

Greater emphasis should be placed on consulting both statutory and nonstatutory stakeholders early, and 'upstream', within the LAQM Review and Assessment process.

Recommendation 2

Consideration should be given to creating sufficient conditions to enable 'embedded' LAQM consultation – consisting of non-statutory stakeholder partnerships which interact with local authority and other formal stakeholder groups through the consultation process.

Recommendation 3

Consideration should be given to tasking a small number of differing local authorities to test this enhanced form of LAQM consultation practice with a view to encouraging its general use by local authorities in the Fourth Round of Review and Assessment.

In England, where the project takes its focus, Defra are the statutory regulatory body for LAQM processes operated by local authorities - consequently we have, in the first instance, directed our recommendations at Defra. However, we should also note that our prime recommendation to local authorities is to consider the use of the following '10 Steps to Better Practice'. We then identify and work through the sets of challenges and opportunities that face local authorities in carrying through those steps.

8. 10 STEPS TO BETTER LAQM CONSULTATION



8.1 'Joined-up' Work: Internal and External Statutory Stakeholder Communication



Photo – Tim Chatterton

Definition:

An integrative collaborative mode of working is essential to successfully implementing LAQM within and between local authorities and their statutory stakeholders. This may simply mean better communication within a single authority; or may involve broader collaboration between two tiers of local government within county authorities having responsibility for transport planning and strategic land-use planning in areas covered by non-unitary authorities. 'Joined-up' work practice can also include health authorities, the Environment Agency, and the Highways Agency.

Challenges:

- Internal communication necessary for 'joined-up' work within an authority can be difficult. It is not a simple task to knit together environmental health, land-use, built development, and transport planning departments practices, processes, resources, drivers and agendas.
- There may be similar challenges for external multi-organisational work with statutory stakeholders outside an authority, with the potential for added complexity due to deeper communication barriers and structural constraints & drivers.
- Local authorities can feel like 'piggy in the middle' sandwiched between their statutory stakeholders.

- 'Joined-up' work allows for better communication and inter-play of expertise within internal local authority departments and between external local authorities.
- 'Joined-up' work provides for better 'multi-layer' governance between local authorities and external statutory stakeholders – e.g. Regional Assemblies, Defra, Environment Agency, Highways Agency, Mayors, neighbouring authorities, county councils, and National Park authorities.

8.2 Resourcing Consultation

Definition:

Here we mean the ability to draw down resources to fund LAQM consultation by local authorities. However, a broader definition includes the time taken and the pool of expertise that can be drawn upon.

Challenges:

- All local authorities have finite financial, time and expertise resources.
- In general, authorities cannot draw on a set-aside internal fund to carry out LAQM consultation.
- Differing local authorities have differing resources. Our questionnaire and case study research indicates that smaller rural authorities tend to have much less time and money to carry out LAQM consultation than their larger metropolitan counterparts.
- There are only limited central and external draw-down funds, and there's a high level of competition for those funds.
- There's a relative lack of training and guidance on how to carry out LAQM consultation.

- The relative resource advantages of larger metropolitan authorities can be employed to drive forward innovation in LAQM consultation practice.
- Funding that follows 'Beacon' status can resource better practice.
- The potential for external funding must be explored. In this context, Local authorities should be prepared to lever and merge external resources with internal resourcing commitments.
- Exploratory LAQM consultation audits which internalise the costs of consultation can be carried out in order to directly quantify time and money spent on stakeholder engagement.

8.3 'Up-stream' Early Engagement

Definition:

'Upstreaming' means engaging with all stakeholders at the beginning of a consultation process. In this context it means pushing forward the consultation envelope - starting from the beginning of the LAQM R & A process with **Updating and Screening Assessment (USA)** and maintaining engagement throughout **Detailed Assessment (DA)**, **Progress Report (PR)**, **Air Quality Management Area (AQMA) declaration, Further Assessment (FA)** and **Air Quality Action Plan (AQAP)**. Although the concept of 'upstream' (or early) consultation engagement is operationalised in a linear form within each round of R & A; in practice this form of engagement should prove cumulative and ongoing (i.e. from round to round). In practice, R & A starts wide and then drills down to those areas where risk of exceeding objectives exists. We recommend that the consultation process mirrors this process.

So essentially, authorities should engage with stakeholders at the beginning of the process - even before they start to undertake R & As – so that stakeholder perspectives are already brought to bear in thinking through monitoring and time resource allocation. Authorities could then take the stakeholders along with them through the whole process, i.e. through the differing USA, DA, PR, AQMA declaration, and AQAP stages. In this way, the authority can build 'bottom-up' community trust in their LAQM processes.

Challenges:

- There can be difficulties in identifying and contacting a broad and legitimately representative set of non-statutory stakeholders.
- The different knowledge bases of statutory and non-statutory stakeholders can be difficult to negotiate.
- To date, meaningful community engagement has tended to occur 'downstream' at later AQMA declaration and AQAP stages where the effects of 'upstream' decisions are played out.

- Engaging at the beginning of LAQM rounds opens up 'negotiation spaces' between all stakeholders and, critically, builds community trust in the process.
- By starting with a 'blank sheet' before options are framed, the consultation process is not 'closed-out' by the technical nature of relatively complex air quality monitoring data.
- Early engagement drives early consultation planning by local authorities.
- 'Upstreaming' facilitates the setting up of 'co-work' opportunities between local authorities and communities.

8.4 Providing Information

Definition:

The provision of detailed quantitative data, and readily understandable qualitative information. Both forms should be provided throughout the process to support statutory duties and non-statutory engagement.

Challenges:

- It can be difficult to acknowledge the different knowledge bases of stakeholders whilst not falling into the 'public knowledge deficit model' trap. In other words to acknowledge and respect both expert and nonexpert knowledge and experience.
- There are difficulties in providing both quality-assured complex, detailed air quality data; and providing accessible, easily understood summaries.
- Although controversial, it may be important (as a trust-building exercise) to acknowledge elements of uncertainty and complexity in the fundamental science that underpins LAQM.

- Historic and current data-sets and monitoring regime information exists.
- Defra quality-assurance of LAQM data ensures good base-line information.
- Detailed information can be embedded within reports.
- Reports should include readily accessible summaries.
- 'One-stop' LAQM data can also be provided through web-sites, mailshots, leaflets, and during meetings. This informs and empowers community involvement.
- Real-time data can be provided through web-sites.

8.5 'Embedded' Engagement



Photo – Simon Spokes

Definition:

This innovative form of engagement is currently practiced in a very few local authorities. Essentially this process consists of forming self-sustaining non-statutory stakeholder groups, or 'engagement vehicles', who are empowered to interact with their local authority and other formal statutory stakeholders. This interaction is best enabled by effective and engaged local authority, community and council 'local champions'. The 'co-work' opportunities forged between local authorities and their community's builds trust, expertise, and 'buy-in'. Once these initial consultation 'vehicles' are set up, they tend to be self-sustaining.

Challenges:

- The LAQM issue must be one that communities regard as 'a problem' that they can 'do something about'.
- 'Embedded' consultation tends to be carried out by innovative, wellresourced larger metropolitan authorities.

- This process can be dependent on the identification of effective local authority, community 'outreach' and council LAQM advocates or 'local champions'.
- There are initial local authority and 'active citizenship' time, expertise and funding resource implications.
- Although generally self-sustaining, the process is on-going and may need to be nurtured through each successive LAQM round.

- 'Embedded' engagement is best enabled by effective and engaged local authority, community and council LAQM advocates or 'local champions'.
- 'Co-work' exercises between authorities and their communities that are a part of 'embedded' engagement goes a long way to building trust, expertise, and 'buy-in'.
- Can forge practical links between informal non-statutory and formal statutory LAQM networks.
- Draw-down funding can be sought in order to resource outreach workers, and fund innovative community-based monitoring in support of local sustainability.

8.6 Linking Statutory and Non-Statutory Networks

Definition:

Formalising the way in which the links between the views, experience, and knowledge of informal (non-statutory) and formal (statutory) stakeholders are operationalised within the LAQM decision-making process.

Challenges:

- Linking and translating the views of informal non-statutory and formal statutory stakeholders can depend on effective communication between a set of local authority, community and council LAQM advocates or 'local champions'.
- The local authority needs to be assured that the informal non-statutory network can legitimately represent the interests of their community.
- The community needs to be assured that the local authority will take their views seriously, and will impact on the LAQM decision-making process.

- Embedded engagement 'vehicles' funded by institutional resource structures allow for clear links to be made between the community and the local authority.
- Aligning the views of non-statutory and statutory stakeholders levers greater local political power within the LAQM decision-making processes.
- Better links between statutory and non-statutory networks builds trust and greater representative legitimacy.

8.7 Maintaining Engagement

Definition:

Primarily the means by which local communities 'keep up' interest and commitment to the on-going LAQM consultation process. Maintaining engagement also refers to the ability to sustain constructive dialogue between local authorities and statutory stakeholders.

Challenges:

- On-going community engagement is dependent on good local authority engagement practice. Poor consultation practice creates mistrust and undermines future public engagement.
- Since LAQM is a relatively slow-moving and incremental process, there
 may be difficulties in maintaining engagement throughout each individual
 LAQM R & A round, and from round to round.
- Maintaining consistent and constructive engagement with statutory stakeholders can be a problem. The timing and quality of feedback can be variable.

- Good consultation practice nurtures trust and capacity-builds involvement.
- 'Embedded' consultation via community engagement 'vehicles' can prove to be a self-sustaining resource that can be drawn on.
- These vehicles can be maintained through community-based monitoring.

8.8 Delivering Consultation Outputs



Photo – Tim Chatterton

Definition:

To generate outputs from the consultation process that feeds into policy formulation and implementation processes in order to deliver better local air quality outcomes.

Challenges:

- There can be difficulties in reporting and 'weighting' consultation responses.
- Difficulties in structurally incorporating consultation outputs in the LAQM decision-making process.
- Difficulties in drawing down central funds to operationalise AQAP based on consultation outputs.

- It is conceivable that 'air quality as a material planning consideration' may be given greater weight in LAQM policy-making by knitting together local authority, community, and statutory consultation views and insights.
- 'Integrated consultation' adds value to policy making through greater legitimisation of the decision-making process. In other words, delivering outputs based on effective consultation allows for greater 'buy-in' by all stakeholders.
- Delivering consultation-based outputs provides proof of the principle that 'active citizenship' works.

8.9 Evaluation and Review

Definition:

Testing aims, objectives, process, and outcomes in terms of the efficiency and effectiveness of the resources deployed.

Challenges:

- Evaluation and review of consultation processes can be seen as a further extension of the problematic aspects of an audit culture – 'blaming and shaming'.
- Evaluation and review has time, funding and expertise resource implications.

- Better consultation practice achieves compliance with statutory requirements, HM Government 'code of practice', and LAQM-specific guidance.
- Evaluation and review legitimises local authority actions in the eyes of all stakeholders.
- Constructive appraisal helps to identify areas of successes and potential improvement.
- Evaluation and review can help to 'separate out' systemic drivers for poor air quality and the capacity for local action to improve that air quality.
- Opportunities for stakeholders themselves to become engaged in evaluation

8.10 Iterate

Definition:

Iteration comprises a series of linked events through time which are tested and repeated in order to improve and refine a process.

Challenges:

- Iteration between LAQM rounds may induce consultation fatigue. Communities may perceive that 'decide announce defend' (DAD) may be succeeded by 'unlimited never-ending consultation leading to exhaustion' (UNCLE).
- LAQM R & A is an incremental and measured process consultation may unfairly raise expectations that air pollution will show a dramatic improvement in a relatively short time.

- Each round of R & A builds on knowledge and experience gained by local authorities, statutory and non-statutory stakeholders in earlier consultation iterations.
- Consultation iteration between LAQM rounds fits in with the iterating and incremental nature of the R & A process.

9. CONCLUSION

In summary, we have identified '10 steps to better practice' based on our questionnaire and case study research. We believe these steps have resonance in the local authority LAQM community and this has been reflected back to us by a broad and representative range of local authorities during the 4 regional workshops run to test and review our initial research findings.

We have made a set of recommendations to Defra who, in principle, are in accord with those recommendations. We suggest that local authorities should consult statutory and non-statutory stakeholders early, and 'upstream', within the LAQM R & A process. In order to do this, consideration should be given to creating sufficient conditions to enable 'embedded' LAQM consultation – consisting of non-statutory stakeholder partnerships which interact with local authority and other formal stakeholder groups through the consultation process. Further consideration should be given to tasking a small number of differing local authorities to test this enhanced form of LAQM consultation practice with a view to encouraging its general use by local authorities in the Fourth Round of R & A.

We conclude that local authorities and their stakeholders' commitment to involve in the process are best enabled via experienced and effective 'local champions' within both the community and the local authority. Local authorities and their communities should, optimally, be able to access adequate resources to engage in the consultation process levered by relevant funding streams. Trust in the process can be built through 'co-work' exercises - for example LAQM knowledge can be co-produced via 'pollution measurement partnerships' (between the community and the local authority). Perhaps the most critical determinant of 'better practice' LAQM consultation is the link between consultation and subsequent decisions. Critically, stakeholder engagement should be timely and have the capacity to effect real change via a clear association with the LAQM decision-making process. In this context, 'air quality as a material planning consideration' may be given greater weight by aligning statutory and non-statutory stakeholder views with local authority environment, transport and land-use strategies to produce better air quality outcomes.

APPENDIX 1 - CONSULTATION OPPORTUNITIES



APPENDIX 2 - PROJECT STEERING GROUP

Dr Mark Everard Environment Agency Principal Scientist, Risk and Forecasting Mark.Everard@environment-agency.gov.uk

Carol Tidmarsh Defra Carol.Tidmarsh@defra.gsi.gov.uk

Rob Pilling NSCA (formerly) Policy Officer Rpilling@nsca.org.uk

Alan Greer University of the West of England Reader, Faculty of Humanities, Languages and Social Sciences Alan.Greer@uwe.ac.uk

Dinah Woolley South Gloucestershire Council Senior Environmental Health Officer Dinah_woolley@southglos.gov.uk

WEBSITE

Those who wish to draw upon further resources and working documents resulting from this project should review the following web-site where a final report to the funding body can also be found:

http://www.uwe.ac.uk/aqm/esrc/

RESEARCH STAFF

Dr Paul Dorfman^{1,3}, Dr Nurul Leksmono¹, Prof James Longhurst¹ (Principal Investigator), Prof David Gibbs², Prof Frank Burnet³, Dr Emma Weitkamp³, Dr Clare Beattie (to 12/05).

Air Quality Management Resource Centre¹, Faculty of Applied Sciences, University of the West of England, Bristol, BS16 1QY Telephone: 0117 32 83825 Fax: 0117 32 82132 Email: James.Longhurst@uwe.ac.uk

Department of Geography², University of Hull, Cottingham Road, Hull, HU6 7RX Telephone: 01482 465 330 Fax: 01482 466 340 Email: d.c.gibbs@hull.ac.uk

Graphic Science Unit³, Faculty of Applied Sciences, University of the West of England, Bristol, BS16 1QY Telephone: 0117 32 82081 Fax: 0117 32 83360 Email: <u>Emma.Weitkamp@uwe.ac.uk</u>

SOME HELPFUL FURTHER READING

Brickell P (2000): People Before Structures: Engaging communities effectively in regeneration, DEMOS, London.

http://www.demos.co.uk/catalogue/peoplestructures/

Bristol City Council (2004): Air Quality Action Plan for Bristol, Appendix 4. Report of the Consultation on the Draft Air Quality Action Plan 2003, BCC, Bristol.

http://www.bristol-city.gov.uk/ccm/content/Environment-Planning/Pollution/airquality-action-plan-for-

bristol.en;jsessionid=58D09E893B70C140C59991D542F91BDB

Cabinet Office (2005): Code of Practice on Consultation, better regulation Executive, London.

http://www.cabinetoffice.gov.uk/regulation/documents/consultation/pdf/code.p df

South Yorkshire 'Care 4 Air' Campaign

http://www.care4air.org/

Involve (2005): People & Participation: How to put citizens at the heart of decision-making, Involve, London.

http://www.involve.org.uk/

Local Government Association (LGA) (2003); Designs on democracy: Case studies on democratic participation, LGA, London.

National Society for Clean Air (NSCA) (1999): Consultation for Local Air Quality Management: The 'how to' Guide, NSCA, Brighton.

Office of the Deputy Prime Minister (ODPM) (2005): Citizen Engagement and Public Services: Why neighbourhoods matter, ODPM, London.

People Science & Policy (2002): Dialogue with the Public: Practical Guidelines, Research Councils UK & OST, dti, London.

SAFEGROUNDS (2005): Community Stakeholder Involvement, http://www.safegrounds.com/pdf/community_stakeholder_involvement_revisio n1.pdf

Skidmore P, & Craig J (2005): Start with People: How community organizations put citizens in the driving seat, DEMOS, London. http://www.demos.co.uk/catalogue/startwithpeople/