Draft Air Quality Action Plan
Consultation Results

Introduction

The Air Quality Action Plan (AQAP) is produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the action we propose to take to improve air quality in Derby between 2019 and 2024. The Air Quality Action Plan is embedded within a number of policies and plans on both the national and local level. The draft AQAP details how other policies and plans support the AQAP. The Plan is reviewed every five years and consulted upon; the results from the consultation are incorporated, where appropriate, into the final plan.

The consultation was open for 12 weeks from 6 March 2020 until 29 May 2020. It was primarily conducted through an online survey with paper versions, different versions and translations available on request. People were also given the opportunity to write in with any other comments they had.

102 people gave their view through the online survey

2 respondents sent additional emails or letters

A note on the impact of COVID-19: It is worth acknowledging that from 23 March 2020 the UK was in lockdown due to the COVID-19 pandemic. The initial lockdown, lasting for 7 weeks, only allowed people to leave their homes for essential reasons: to buy food, get medicines or exercise once per day. On 10 May there was a slight easing of lockdown, but at the time of writing (June 2020) lockdown restrictions were still in place.

A note on the data in this report: Data from the 'closed' option questions is presented in the report as a % score. The data in the text of the report is rounded up or down to the nearest whole percentage point. Charts or tables therefore may result on occasions adding up to 99% or 101%. If a table or chart does not match exactly to the text in the report this occurs due to the rounding up or down when responses are combined. Results that differ in this way should not have a variance that is any larger than 1%.

When reading the data, please note that there is a base number against all charts and tables; this is the valid number of responses for that particular question and the figure that the percentages are calculated from.

Background to survey

The draft Air Quality Action Plan (dAQAP) outlined three priorities:

Priority 1 – whilst included in this five year AQAP it focused on Tackling NO_2 hotspots within the city. This priority was previously consulted upon in 2018 and has been agreed by DEFRA so the measures are already being implemented. This priority is therefore was not included within the parameters of this consultation.

Priority 2 – focused upon improving the overall air quality in Derby. This includes support for low emission taxis, an electric vehicle strategy, supporting sustainable development through planning, reducing emissions from heavy goods vehicles, shift to low emission and greener transport options and anti-idling.
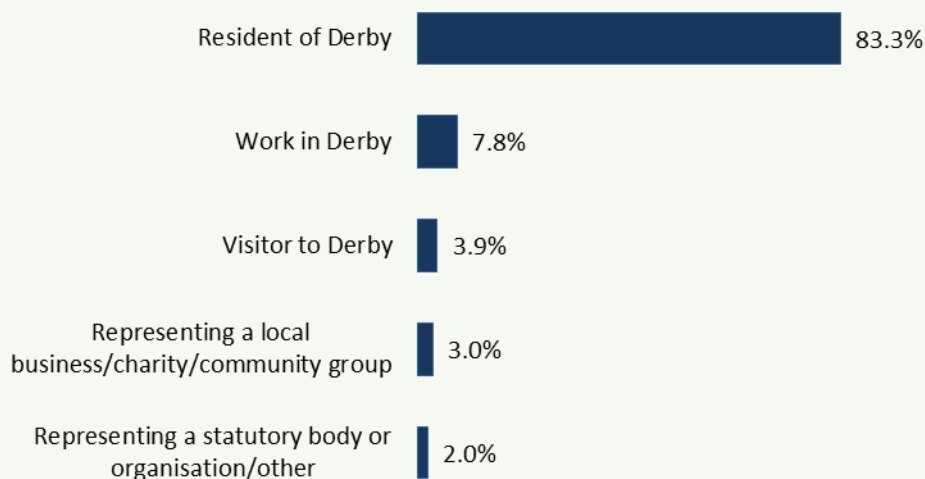
Priority 3 - Managing $PM_{2.5}$ (fine particulate matter) exposure. This priority focused on measures to minimise emissions from burning and bonfires.

Feedback from respondents

Respondents were asked to identify in what capacity they were responding to the survey. Over four fifths of respondents were residents of Derby (83.3%). The remaining respondents either worked in Derby (7.8%), were visitors to Derby (3.9%), represented local business/charity/community group (3%) or represented a statutory body/organisation (2%). [Chart 1].
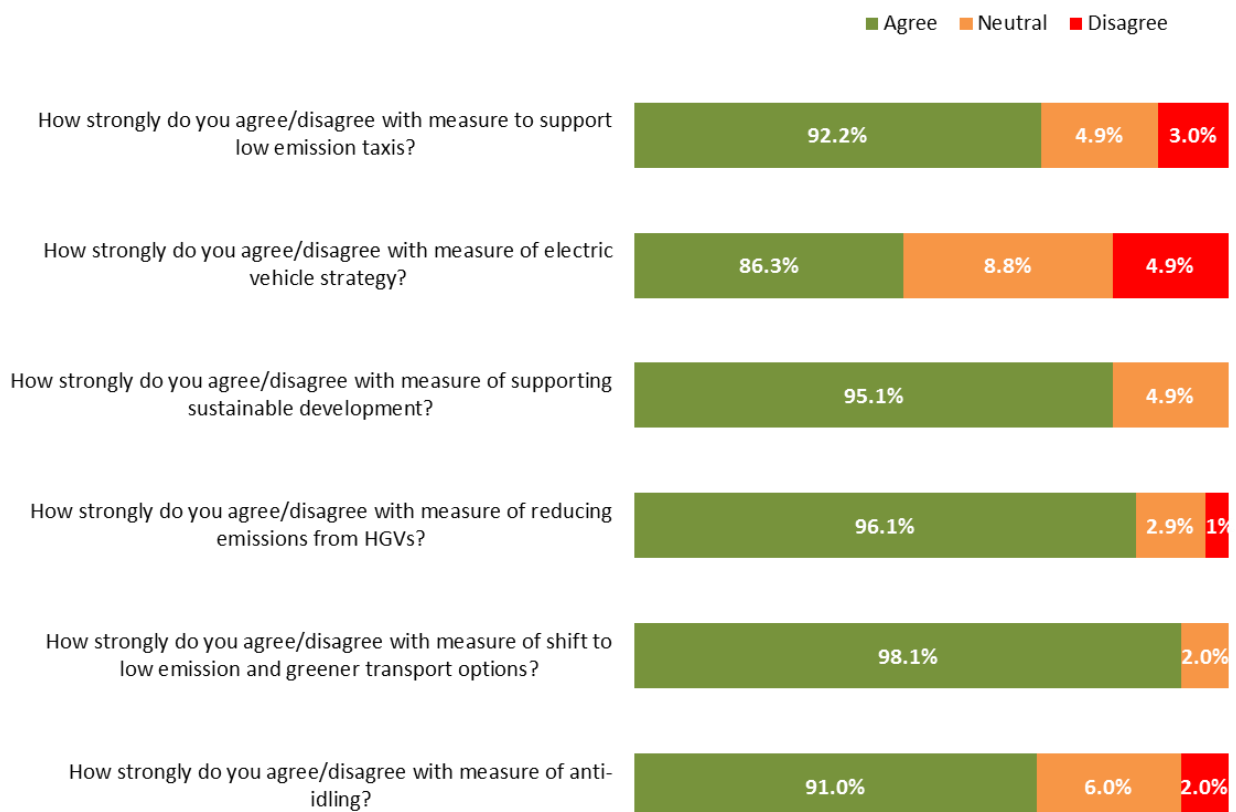
Chart 1:

Resident of Derby — 83.3%

Work in Derby — 7.8%

Visitor to Derby — 3.9%

Representing a local business/charity/community group — 3.0%

Representing a statutory body or organisation/other — 2.0%

 Base: 102 respondents

Feedback on Priority 2 proposals

Of the six measures identified, all received over three quarters in agreement. The proposal that met with the most agreement was the shift to low emission and greener transport options with 98.1% agreeing. The least support, although still obtaining 86.3% agreement, was for the measure of an electric vehicle strategy. [Chart 2]

Chart 2: Strength of agreement with the proposed measures

| | Agree | Neutral | Disagree |

How strongly do you agree/disagree with measure to support low emission taxis? — 92.2% | 4.9% | 3.0%

How strongly do you agree/disagree with measure of electric vehicle strategy? — 86.3% | 8.8% | 4.9%

How strongly do you agree/disagree with measure of supporting sustainable development? — 95.1% | 4.9%

How strongly do you agree/disagree with measure of reducing emissions from HGVs? — 96.1% | 2.9% | 1%

How strongly do you agree/disagree with measure of shift to low emission and greener transport options? — 98.1% | 2.0%

How strongly do you agree/disagree with measure of anti-idling? — 91.0% | 6.0% | 2.0%

Base: 102 respondents for all except anti-idling 101 respondents.

Over two thirds of respondents (67%) felt that the measures in priority 2 were appropriate [Chart 3].

Chart 3: Are the measures in Priority 2 appropriate?

Don't know, 13%
No, 20%
Yes, 67%
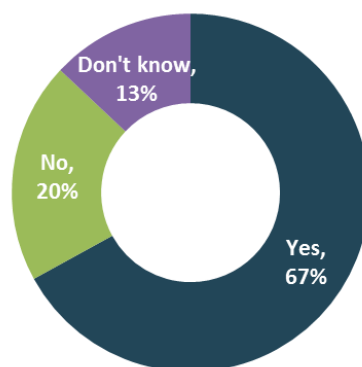
Base: 100 respondents

The 20% of respondents that did not agree that the measures identified in Priority 2 were appropriate were asked to explain what they believed the measures should be. [Chart 3] Several themes emerged [Chart 4] notably the benefits of including active travel measures for cycling and walking (10 comments):

There is too much emphasis on electric vehicles whereas the focus should be on active travel (walking and cycling) as this is the main way to reduce congestion and emissions. I don't feel that the measures to encourage, enable and support walking and cycling go far enough and have had sufficient input from a wide and diverse range of users of these transport methods.

The Air Quality Action Plan suggests moving to low emission alternatives is a key focus but I feel misses an opportunity to promote cycling as an environmental and public health beneficial solution. It references support for some existing initiatives but I feel is minimal and lacks ambition. Of course route maps and school campaigns as highlighted are good but there is little apparent in plans to make cycling safer and put distance between cars and cyclists as a general aim - something that would significantly increase the uptake in cycling and the amount of cycling journeys made.

Some went further, stating that the measures identified in Priority 2 were not ambitious enough (8 comments):

Priority 2 is a good start but needs to be more ambitious. It needs to aim to end all air pollution from vehicles rather than lower it.

Whilst others noted the improvements to the quality of air within the city during the Covid-19 lockdown and the benefits of taking more ambitious steps now…

I don't think they go far enough, there has been a massive improvement in Air Quality in the last twelve weeks and this has been to everyone's benefit. This is the moment for Derby City Council to take Action

Comments on the proposed measures in Priority 2
Consultees were given the opportunity to provide overall comments on the proposed measures in Priority 2; 47 people gave their views. The comments yielded 14 key themes. The most popular theme was the inclusion, within priority 2, of greater measures to focus on active travel solutions (18 comments):

"Shift to low emission and greener transport options" sounds lovely, but it's really vague. [It] Would be good to see a walking and cycling strategy with some teeth to prioritise these modes.

Many of the comments were assigned to multiple themes; some were interrelated. Those that were particularly closely linked were active travel, public transport, fossil fuel vehicles and Covid-19. A number of respondents identified that the lockdown period had already improved air quality within the city through the reduction in use of

fossil fuel vehicles and that active travel was a valuable measure to consider in order that improved air quality levels be maintained. Others were concerned that Covid-19 would impact the use of public transport and foresaw the increased likelihood of private vehicle use:

> But nowhere near enough. The lockdown demonstrates the benefits of clean air and less noise pollution too. There should be no going back. Standards in the lockdown need to be maintained as a minimum.
>
> Build safe cycling infrastructure. Especially now that public transport use will be will be down and a real alternative to the car is needed. Granted not everyone will cycle, but a large number of local or short journeys could be done by bike, if some of these were cycled, this would means fewer cars, less congestion, better air quality.
>
> don't agree with the expansion of roads like the A38 as larger roads always leads to more traffic. There were bottlenecks that contributed to high NO2 and particulates before Covid19, but we've been enjoying much cleaner air without that traffic… We need to fund solutions that decrease fossil-fuelled traffic overall, especially at a time when we need to minimize damage to our lungs. New building developments should have air quality measures embedded and enforced in their plans and only get approval if they comply with high air quality standards and rapidly decreasing impacts on climate change. Just providing some cycle racks and ensuring boilers have to comply with a particular NO2 level is not enough. New builds must be highly energy efficient and have designs that decrease dependence on fossil fuelled vehicles, and proiritise walking and cycling.

Chart 4: Key themes from comments

| Theme	Count
Active travel solutions	18
Public transport	10
Fossil fuel vehicles	9
Promote encourage change	9
Not ambitious enough	8
Taxis	8
COVID-19 effects	7
NO2 levels and health impacts	5
Sustainable development road schemes	5
Anti-idling enforcement	3
General support comment	3
Industrial emissions	3
Council to lead by example	2
HGV freight	1

Base: 47 respondents

Feedback on Priority 3 proposals

Priority 3 contained three measures: Derby to remain a smoke controlled area, the consideration of additional smoke enforcement and the measure to consider DCC's policy on bonfire enforcement. The most supported measure, with 95.1% of respondents strongly agreeing/agreeing was that 'Derby remained a smoke controlled area'. The least supported measure, 'to consider DCC's policy on bonfire enforcement', which although 74.5% of respondents strongly agreed/agreeing with also had 8.8% disagreeing/strongly disagreeing. [Chart 5]
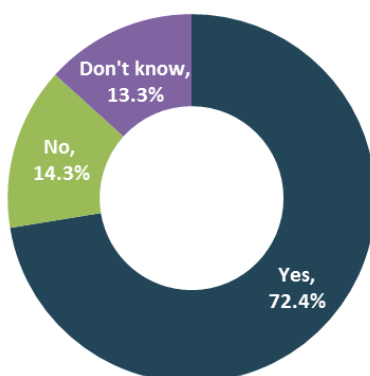
Chart 5: Strength of agreement with the proposed measures
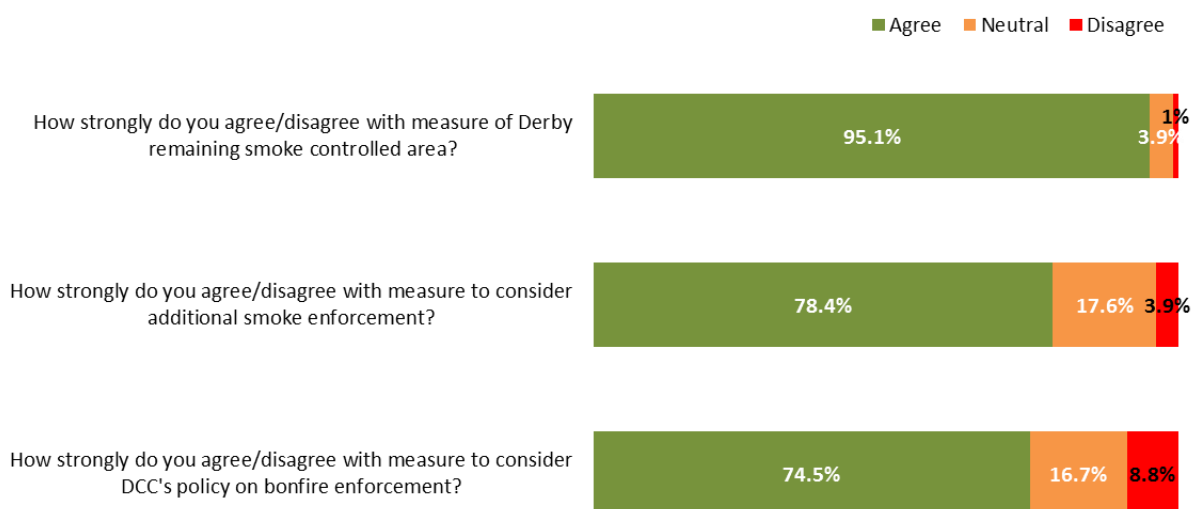
Base: 102 respondents.

Just under three quarters of respondents (72.4%) believed that the measures in Priority 3 were appropriate. [Chart 6]

Chart 6: Are the measures in Priority 3 appropriate?

Base: 98 respondents.

13 respondents that didn't believe the measures in priority 3 were appropriate were asked to explain why. 8 key themes emerged. The largest numbers of comments related to active travel (3 comments) and wood/coal burning (3 comments). [Chart 7]

Build safe cycling infrastructure. Especially now that public transport use will be will be down and a real alternative to the car is needed. Granted not everyone will cycle, but a large number of local or short journeys could be done by bike, if some of these were cycled, this would means fewer cars, less congestion, better air quality.
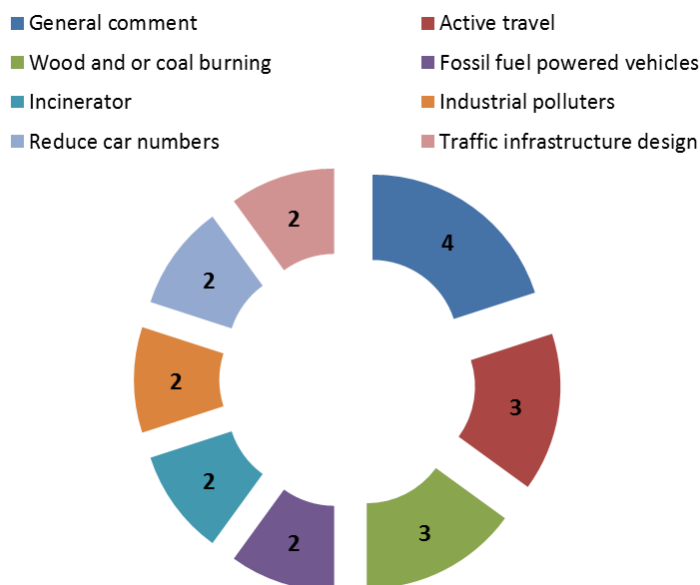
the burning of wood and coal for some people may be the only source of heating so prohibiting its use may put them in danger, especially if they are elderly. The council needs to understand the issues relating to the use of wood and coal and then put in place strategies to address the issues of elderly and those in financial hardship.

Others commented on industrial emissions (2 comments), with some directly making reference to the incinerator (2 comments):

While the suggestions will help to improve the situation there needs to be targeted control of industrial emissions which will include pm2.5 emissions. There also needs to be pm2.5 emissions monitoring by the council.

You are worried about fine particulate matter, so domestic bonfires are of negligible concern. Of far more concern are diesel motors and generators, industrial chimney output and so forth. You also need to admit that any clean air policy is incompatible with the commissioning of an incinerator that has never worked properly.

Chart 7: What priority 3 measures should be key themes

- General comment
- Active travel
- Wood and or coal burning
- Fossil fuel powered vehicles
- Incinerator
- Industrial polluters
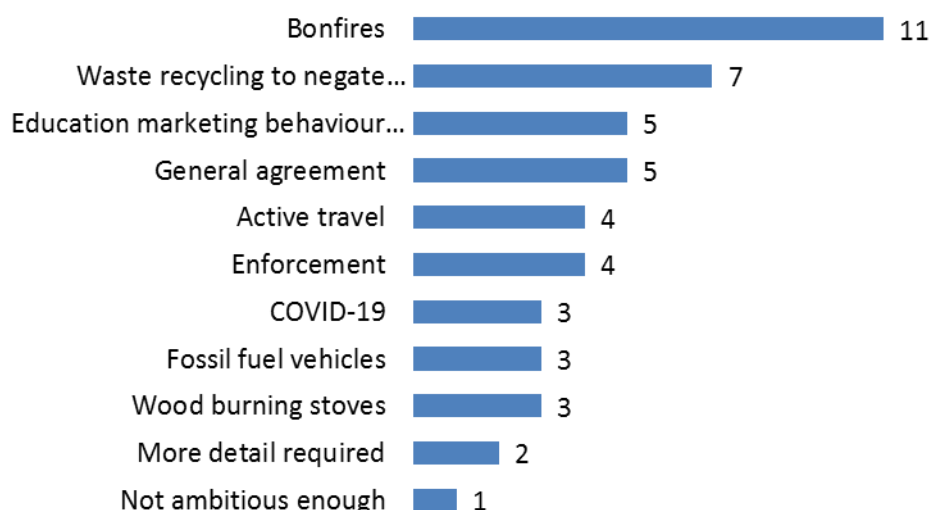- Reduce car numbers
- Traffic infrastructure design

Base: 13 respondents.

Comments on the proposed measures for Priority 3

33 respondents made further comments on the proposed measures in Priority 3. 11 key themes emerged [Chart 8].

Chart 8: Key themes from comments about priority 3

Base: 33 respondents.

11 comments were made concerning Bonfires, from those wishing for them to be banned and fines being introduced, to those that thought enforcement would be difficult:

Go further ban smoke ban people having fires in their back gardens like they always do. Do on the spot fines like Europe

Bonfire enforcement will be difficult, and could cause resentment.

Others cited that the prevalence of bonfires was directly related to waste disposal and changing behaviours:

The issue of bonfires would seem to be a side issue if there are restrictions in place. It then becomes an enforcement issue which would depend on the extent of the problem. Unfortunately the burning of rubbish is also associated with the facility of disposing of rubbish so a good refuse service is part of the solution

Give people more options for getting rid of garden waste, paying an additional fee for larger capacity brown bins or additional bins/collections would help. With a large garden or allotment one bin every two weeks is too little pushing people to have bonfires to get rid of waste.

We need to ensure that our refuse collection and recycling options are strong enough to support behaviour change.

An active travel solution to negate the use of fossil fuel vehicles was once again identified as playing an important role in the reduction of burning and emissions.

General comments, suggestions and feedback

Consultees were also given the opportunity to make any broad comments or suggestions on the dAQAP as a whole – 61 responded, some making multiple comments. The themes emerging from these comments are set out in Chart 9. They ranged from inclusion of active travel solutions within the proposed Air Quality Action Plan to suggestions about how behaviour changes could be encouraged; from the positive improvement to air quality following Covid-19 lockdown and what our focus should be going forward.

Comments made have been coded into themes for the purpose of the analysis. The 14 key themes emerging from these comments are summarised in Chart 9 below.

Chart 9: Themes emerging from additional comments and suggestions
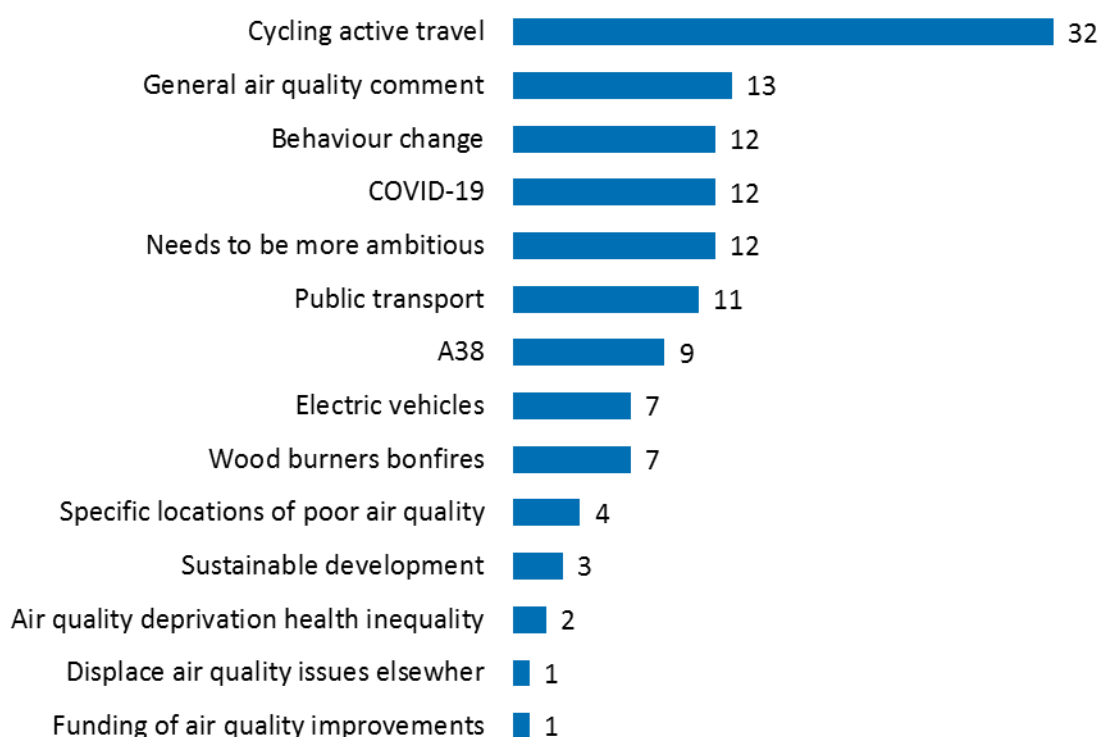
Base: 61 respondents

Many of the themes that emerged replicated those that were previously identified in the Priorities. 52.5% of respondents made comments about Active travel (32 comments). This category appeared to dominate the comments and was a continuation of the comments previously made.

I feel there is so much more opportunity to promote and progress cycling as an effective part of the solution to cleaner air and public health. I know we are talking about transport here and not all cyclist wear lycra (I cycle to work in my suit on days I don't need my car) but with a velodrome, world class cyclists and nationally and internationally respected manufacturers of bikes, equipment and clothing, Derby has all the ingredients to embrace cycling as part of its identity. Are we looking the gift horse in the mouth that combined with a bit of ambition and vision would enable us to lead the way in being nationally recognised cycling friendly city?

In the first 2 weeks of the consultation there were 8 completed survey responses. Usually, response rates for consultations tend to be greater immediately after launch and rates decline for the remaining duration of the fieldwork period. However, unusually in the case of this survey, the following 10 weeks, whilst the survey was live, the country was in lockdown. During this period 94 respondents gave their views. There appears to be a correlation between the date that the comments were made and the perceived improvements to air quality as a result of Covid-19 restrictions; typically in relation to active travel, behavioural change and the plan not being ambitious enough.

How might we make the biggest changes to air quality? Having a viral epidemic is doing that for us at the moment - the challenge is to ensure that as people get back to working that remote working becomes standard for where it works, that people can cycle wherever possible and safely (more cycle lanes not less!), and all diesel based traffic is rapidly reduced and/or uses lower emission fuels. We have to change our 'normal' so that health and welfare of people and the environment around us are the priorities, not creating more roads for more traffic and fuelling worse climate heating.

BE MUCH MORE AMBITIOUS PLEASE. Big hairy audacious goals that will take people with you, building on the good things of the lockdown period.

Weak and not specific. Does not go far enough. Nothing tangible here whatsoever. Now we can see/smell how the pollution has reduced in the last few weeks a little more definitive action please

I think it's very important as we face a climate emergency, and following the impact of the Covid19 pandemic that we don't return to "business as usual" Anything to discourage car use, and encourage cycling, walking and use of public transport needs to be done as a matter of urgency. Public transport in Derby is very expensive, it need to be more affordable to discourage the use of taxis and cars when travelling into the city centre, and out into the Peak District or local cities and towns. Existing cycle lanes need to be saved and preserved and a joined up network introduced. Derby City Council should be lobbying the department of transport to scrap the plans for the A38 works. The end result will be more congestion and more air pollution m as there will be greater capacity for more vehicles. This will not benefit the residents of Derby, with the route being used for those passing through with onward journeys and to the North and Birmingham.

Figure 1: Word cloud - Most common words across General feedback
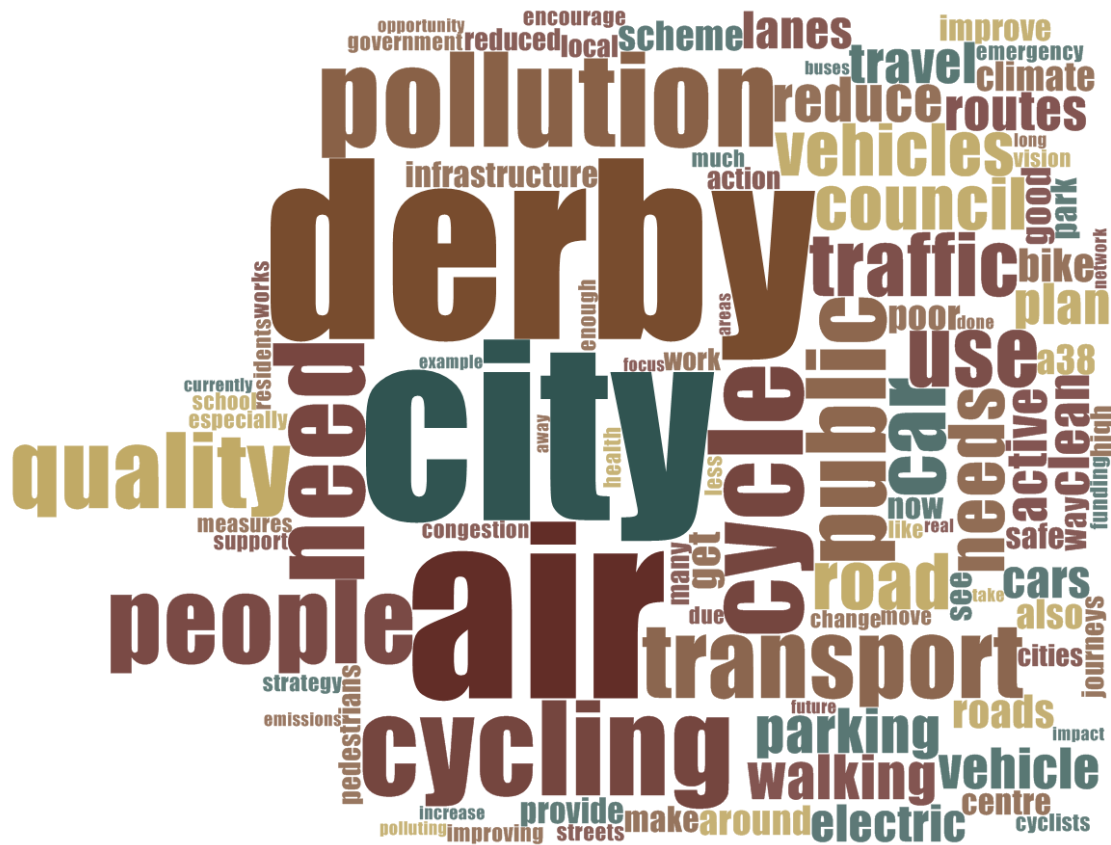
Emails and letters

In addition to the survey responses we also received 2 emails; one from Public Health England (PHE) and the other Intu Derby.

PHE were supportive of the priorities overall strongly supports the continued efforts of the council to improve air quality in its area and reduce public exposure to air pollution. Comments also provided by PHE were:

- PHE recommends a hierarchy of interventions (actions) with preventing, reducing or replacing polluting activities to reduce emissions as the first priority. Actions to reduce the concentration of air pollution once it has occurred is the second priority, and individual avoidance of exposure is the third – it may be possible to embed the hierarchy and 'clean by design' aspirations outlined in the PHE report in the planning requirements that apply to the area around the AQMA, and also more widely. It appears that the Draft AQAP prioritises exposure reduction first with pollution prevention given a lower priority.

- Overall high-level proposals and actions stated in the plan have funding identified, the key stakeholders involved, performance metrics (i.e. KPIs) and impacts (such as reduced vehicle emissions), risks to delivery, current progress (including whether actions/proposals have been paused or withdrawn) and estimated completion date are explicitly stated
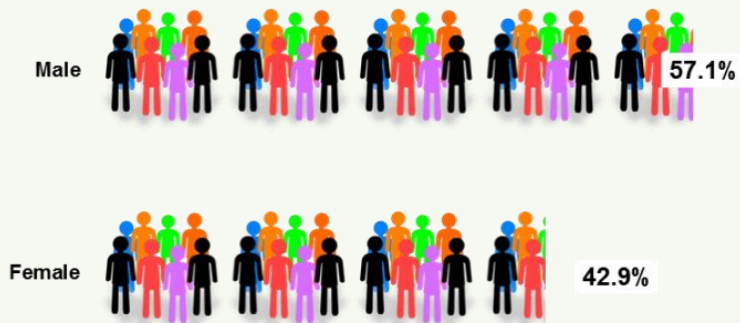
- Elaboration of how impacts/benefits to population health will be measured for actions including their assessment against relevant and available benchmarks is recommended

- Recommended that evaluation should be embedded in the design of interventions from their outset, to gather evidence of their impact and effectiveness

- The PHE review found that behavioural interventions (such as the awareness-raising and educational campaigns outlined in the council's plan) are most effective if designed to account for models of behavioural changes

Intu Derby focused on the measures within Priority 2 and provided a detailed response to each measure. Comments received include:

- Low emission taxis – current capacity of rapid charge points and possible impact of localised congestion near to rapid charge points
- Electric vehicle strategy – Intu are members of the EV100 global initiative and each centre has own EV charging target. Would like to continue to collaborate with DCC/D2N2 to install more
- Sustainable development framework – interested in the 'Guidance for Developers' and questioned whether funding would be made available to enable large developments to meet air quality standards
- HGV/Freight – would encourage DCC to discuss with retailers to understand need, Intu can facilitate this discussion
- Modal shift/green transport – supportive of the push towards green travel and are already working with Connected Derby to encourage this. Implications of Covid-19 and use of private vehicles identified though active travel should be encouraged – secure cycle parking needed
- Anti-idling – supportive but query how this behaviour might be enforced across the entire city if DCC personnel/resources are limited – traffic incident on one side of Derby can quickly propagate its effects across the network, so could potentially be faced with numerous locations of unintended idling to be addressed at the same time.

Who took part?

Figure 2: Gender

Male **57.1%**

Female **42.9%**

Base: 98 respondents

Chart 10: Age

Average age **49**

28.4%

18.9%

16.8% 17.9%

15.8%

2.1%

Under 25   26 - 35   36 - 45   46 - 55   56 - 65   Over 65
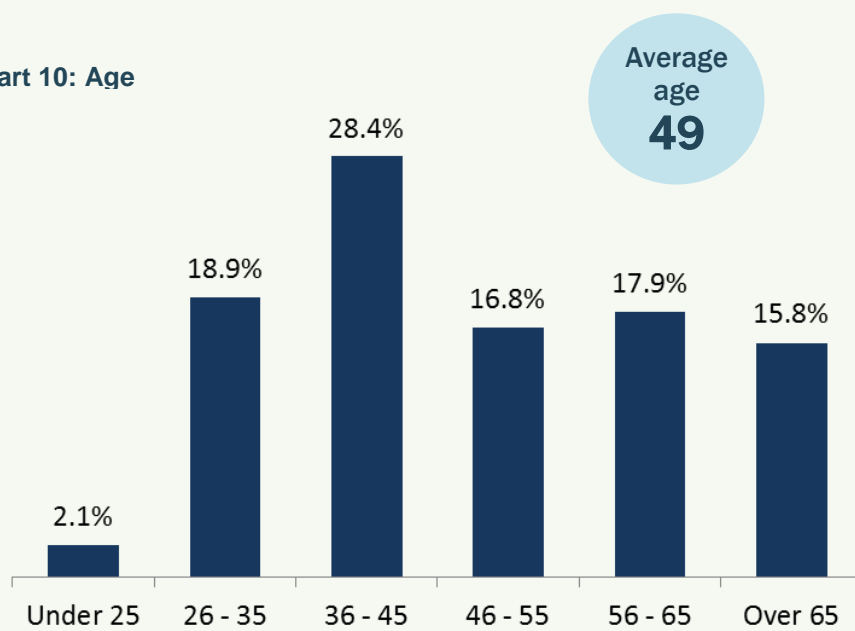
Base: 95 respondents

Chart 11: Sexuality

heterosexual/straight	**77.6%**
bisexual	**7.1%**
a gay man	**5.1%**
a gay woman/lesbian	**1.0%**
Other	**2.0%**
Prefer not to say	**7.1%**
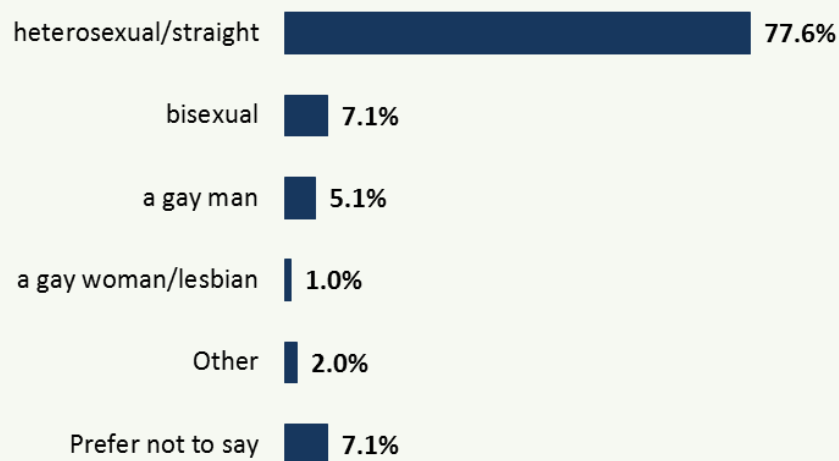
Base: 98 respondents

Chart 10: Same gender as assigned at birth?

No, 3.1%

Yes, 96.9%
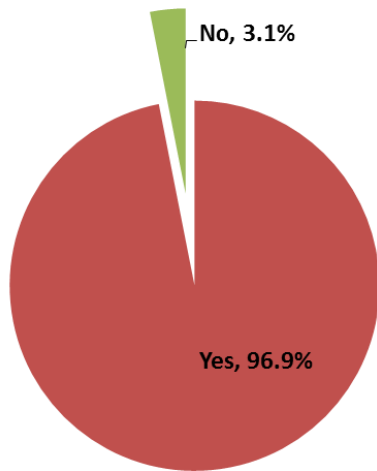
Base: 97 respondents

Chart 12: Do you consider yourself to be a disabled person?

Yes, 11.3%

No, 88.7%
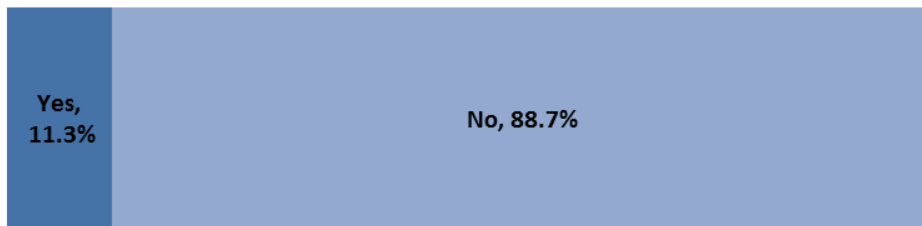
Base: 73 respondents

	Number	%
Asian or Asian British - Indian	1	1.0
Asian or Asian British - Bangladeshi	1	1.0
Black or Black British - Caribbean	1	1.0
Dual Heritage - White and Black Caribbean	1	1.0
Dual Heritage – White and Asian	1	1.0
White - English / Welsh / Scottish / Northern Irish / British	83	86.5
White - Irish	1	1.0
Any other White background	4	4.2
Any other ethnic group	3	3.1

Base: 96 respondents

Table 2: Do you have any religious beliefs?

	Number	%
Yes	30	30.9
No	57	58.8
Prefer not to say	10	10.3

Base: 97 respondents

Chart 13: If yes, to which religion do you belong?
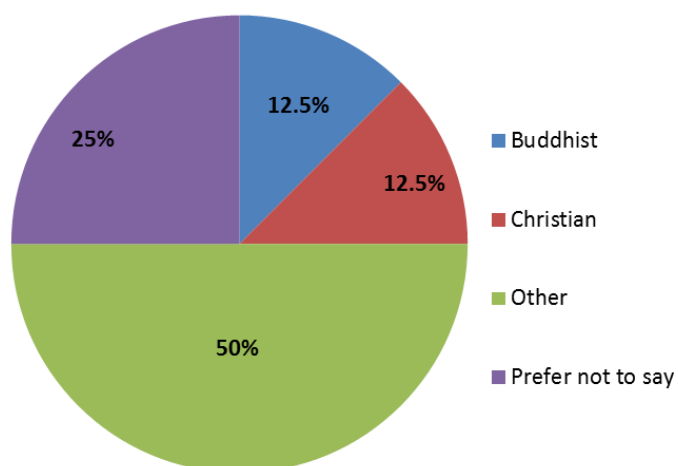
Base: 8 respondents

Appendix A: Data Tables

Do you consent to the processing and storing of your response...

	No.	%
Yes	102	100.0
No, I do not wish to participate in the survey	0	0.0
Total	102	100.0

Table 1: In what capacity are you responding to this survey?*

	No. of Responses	%
Resident of Derby	85	83.3
Work in Derby	8	7.8
Visitor to Derby	4	3.9
Representing a local business	1	1.0
Representing a local charity or community group	2	2.0
Representing a statutory body or organisation	1	1.0
Other	1	1.0
Total	102	100.0

Table 2: How strongly do you agree/disagree with measure to support low emission taxis?

	No.of responses	%
Strongly agree	63	61.8
Agree	31	30.4
Neither agree nor disagree	5	4.9
Disagree	1	1.0
Strongly disagree	2	2.0
Total	102	100.0

Table 3: How strongly do you agree/disagree with measure of electric vehicle strategy?

	No. of responses	%
Strongly agree	66	64.7
Agree	22	21.6
Neither agree nor disagree	9	8.8
Disagree	3	2.9
Strongly disagree	2	2.0
Total	102	100.0

Table 4: How strongly do you agree/disagree with measure of supporting sustainable development?

	No. of responses	%
Strongly agree	73	71.6
Agree	24	23.5
Neither agree nor disagree	4	3.9
Don't know	1	1.0
Total	102	100.0

Table 5: How strongly do you agree/disagree with measure of reducing emissions from HGVs?

	No. of responses	%
Strongly agree	76	74.5
Agree	22	21.6
Neither agree nor disagree	3	2.9
Disagree	1	1.0
Total	102	100.0

Table 6: How strongly do you agree/disagree with measure of shift to low emission and greener transport options?

	No. of responses	%
Strongly agree	83	81.4
Agree	17	16.7
Neither agree nor disagree	2	2.0
Total	102	100.0

Table 7: How strongly do you agree/disagree with measure of anti-idling?

	No. of responses	%
Strongly agree	66	65.3
Agree	26	25.7
Neither agree nor disagree	5	5.0
Disagree	2	2.0
Strongly disagree	1	1.0
Don't know	1	1.0
Total	101	100.0

Table 8: Do you think the measures in priority 2 are appropriate?

	No. of responses	%
Yes	67	67.0
No	20	20.0
Don't know	13	13.0
Total	100	100.0

Table 9: How strongly do you agree/disagree with measure of Derby remaining smoke controlled area?

	No. of responses	%
Strongly agree	80	78.4
Agree	17	16.7
Neither agree nor disagree	4	3.9
Disagree	1	1.0
Total	102	100.0

Table 10: How strongly do you agree/disagree with measure to consider additional smoke enforcement?

	No.	%
Strongly agree	60	58.8
Agree	20	19.6
Neither agree nor disagree	14	13.7
Disagree	4	3.9
Don't know	4	3.9
Total	102	100.0

Table 11: How strongly do you agree/disagree with measure to consider DCC's policy on bonfire enforcement?

	No.	%
Strongly agree	54	52.9
Agree	22	21.6
Neither agree nor disagree	15	14.7
Disagree	8	7.8
Strongly disagree	1	1.0
Don't know	2	2.0
Total	102	100.0

Table 12: Do you think the measures in priority 3 are appropriate?

	No.	%
Yes	71	72.4
No	14	14.3
Don't know	13	13.3
Total	98	100.0

Table 13: Are you...(please select one)

	No.	%
Male	56	57.1
Female	42	42.9
Total	98	100.0

Table 14: Is your gender the same as you were assigned to at birth?...

	No.	%
Yes	94	96.9
No	3	3.1
Total	97	100.0

Table 15: What was your age on your last birthday?

	No.	%
Under 25	2	2.1
26 - 35	18	18.9
36 - 45	27	28.4
46 - 55	16	16.8
56 - 65	17	17.9
Over 65	15	15.8
Total	95	100.0

Average Age: 49 (Age range: 23 - 83)

Table 16: To which group do you consider you belong?

	No.	%
Asian or Asian British - Indian	1	1.0
Asian or Asian British - Bangladeshi	1	1.0
Black or Black British - Caribbean	1	1.0
Dual Heritage - White and Black Caribbean	1	1.0
Dual Heritage - White and Asian	1	1.0
White - English / Welsh / Scottish / Northern Irish / British	83	86.5
White - Irish	1	1.0
Any other White background	4	4.2
Any other ethnic group	3	3.1
Total	96	100.0

Table 17: Do you consider yourself to be a disabled person?

	No.	%
Yes	11	11.3
No	86	88.7
Total	97	100.0

Table 18: I consider myself to be?

	No.	%
heterosexual/straight	76	77.6
bisexual	7	7.1
a gay man	5	5.1
a gay woman/lesbian	1	1.0
Other	2	2.0
Prefer not to say	7	7.1
Total	98	100.0

Table 19: Do you have any religious beliefs?

	No.	%
Yes	30	30.9
No	57	58.8
Prefer not to say	10	10.3
Total	97	100.0

Table 20: If yes, to which religion do you belong?

	No.	%
Buddhist	1	12.5
Christian	1	12.5
Other	4	50.0
Prefer not to say	2	25.0
Total	8	100.0