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Sent by email to defra.library@defra.gsi.gov.uk

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Dear Sir or Madam,

NSCA Comments on the Proposed Indicators for the New Local Government Performance Framework

This letter gives the views of the National Society for Clean Air and Environmental Protection on the proposed indicators for the new local government performance framework.

Opinions on the Proposed Air Quality Indicator

We are pleased to see the proposed performance indicators include, for the first time, air quality, and have watched development of the air quality indicator with interest.

The proposed indicator has a number of positive features.

- The idea of mirroring one of the proposed climate change indicators is a very good one, as this further reinforces the links between the two areas. This helps implement the recommendations of the recent AQEG report, as enshrined in the new Air Quality Strategy.
- The need for only a single set of data for the two indicators minimises the burden on local authorities.
- The corporate emissions climate change indicator and proposed air quality indicator will help local authorities to manage their own emissions. Some officers currently attempting to do this find it difficult to get the necessary data from all of their service areas, and the introduction of a mandatory indicator will greatly assist them in this process.

Where the indicator falls down, however, is that it misses the main focus of a local authority's work on air quality – air quality in the community they serve. DEFRA's opinion during the development process appears to have been that the effect of having an air quality indicator will itself be a spur to local authority activity and the actual form of the indicator is perhaps less important. We believe this underestimates the importance of performance indicators to local authority management and political leaders. The effect of the proposed indicator is likely to be an increased importance attached to a local authority's own emissions, to the detriment of resources attached to work on the Local Air Quality Management regime.

The failure to develop a community emissions indicator would appear to stem from the lack of good emissions inventories in many local authorities, and the difficulty in splitting emissions reductions that result from national and local activities. Whilst this is a problem, we notice that this doesn't appear to have been a consideration in the development of a community climate change mitigation indicator. With this indicator all emissions are covered and the role of local authority's as 'community leaders' is promoted, rather than

making an attempt to measure emissions reductions attributable only to local activity. Calculation of the indicator will be carried out centrally, eliminating any need for the local authority to provide data themselves.

Suggestions for a Revised Air Quality Indicator

NSCA suggests that the concept of the air quality indicator mirroring the climate change is a very good one, however the current proposals do not take this far enough. We would like to see a community emissions indicator for air quality covering all emissions, thus focusing on the role of local authorities as community leaders. Ideally both the climate change and air quality indicators would be integrated under a single 'Mitigation of Damaging Atmospheric Emissions' heading, and use the same assessment tool for corporate emissions of both CO₂ and local air pollutants (as already suggested). Both sets of community emissions could be provided centrally by DEFRA.

This approach would reinforce the Local Air Quality Management regime, and also further strengthen the links between actions to improve air quality and greenhouse gas emissions. Although an outcome-based indicator would ideally measure concentrations of pollutants and exposure, rather than emissions, we feel that an emissions based approach for the indicator is far more feasible, and also has a strong tie in with the exposure reduction targets for PM_{2.5} introduced in the new Air Quality Strategy.

Producing such an indicator is obviously a fairly complex task, and we would suggest that DEFRA convened a working group to examine the issues involved and develop an assessment tool. In the mean time a less accurate, but valuable, figure can be produced using proxy data currently used to produce estimates of carbon emissions from local authority districts, e.g. fuel use by sector combined with emission factors.

Neighbourhood Noise

We are disappointed at the lack of any indicator within the performance framework for noise, despite the increasing importance of noise suggested by the:

- Expected publication this year of a National Noise Strategy, which will aim to improve the local environment and quality of life.
- Pending obligations under the Environmental Noise Regulations 2006 for the designation of quiet urban areas, and under the Environmental Noise Directive for noise action plans by mid 2008.
- Continued rise in demand for solutions to noise problems encountered by the vast majority of local authorities.

Contaminated Land

We welcome the lack of any indicators for contaminated land, and support the recommendation in the 'Lifting the Burdens' report for the immediate removal of the BV216a and BV216b, covering contaminated land. These indicators placed a burden on local authority resources and did not provide a meaningful comparison between local authorities, as was intended. We hope, however, that contaminated land will remain a priority for local authorities and that more resources will be available for the implementation of Part 2A inspection strategies.

Conclusions

Whilst we strongly support the inclusion of air quality within the performance framework, and also the mirror approach to the mitigation of CO₂ indicator, the proposed indicator seems to misunderstand the importance of these metrics to local authorities. It overestimates in its assumption that any air quality indicator will attach importance to air quality, whilst it underestimates the effects it will have in drawing resources to a local

authority's corporate emissions, which are after all only a tiny percentage of community emissions as a whole.

Our suggested way forward is a mirroring of both the corporate and community CO₂ indicators, ideally grouped under a single 'Mitigation of Damaging Atmospheric Emissions' heading. This approach would reinforce the status of the LAQM regime within local authorities, and reinforce the co-management approach to atmospheric emissions.

We would also suggest that a performance indicator be introduced for neighbourhood noise to reflect the increasing amount of legislation affecting this area, and the considerable importance attached to noise by the residents, offices and elected members of the vast majority of local authorities.

If you need further information about the comments in this letter please don't hesitate to get in touch.

Yours Faithfully

Ed Dearnley
Policy Officer