

# ***Information/Discussion Paper***

**Overview and Scrutiny – 7 September 2020**

## **Air Quality and Schools**

This note contains the information to keep Members informed of matters relating to the work of the Committee, but where no decisions from Members are needed

### **Why has this come to Scrutiny?**

In February 2020, officers reported to O&S on Air Quality in CBC, including a requirement to vary the boundaries of the existing Air Quality Management Area (AQMA) from including the whole of the borough to a small area of High Street /Poole Way and Swindon Road. At that meeting Members requested a further briefing on air quality issues affecting schools in the borough. In particular members asked to be briefed on the various responsibilities which are divided between CBC and Gloucestershire County Council (GCC).

### **Summary of Issue**

Issues of air quality in Cheltenham have significant overlap with the Council's intention for the borough to be carbon neutral by 2030. The actions taken by the council to improve air quality, both in the AQMA and more broadly will need to focus on lower-carbon options, including more walking and cycling.

In England and Wales, around 2,000 schools are in areas of poor air quality. Children are more vulnerable because their lungs are still developing, they breathe faster, and are closer to sources of pollution. Parents may choose to drive children to school for a variety of reasons, but that may actually increase exposure in the vehicle and cause more pollution around it. The effects of air pollution on children can be linked to poor lung function, asthma, more frequent infections, and in later life diabetes and cancer.

### **Local air quality context**

The changes to the designated AQMA approved in February were delayed by lockdown, but have now been signed and are effective from 1st Sept. These changes now require CBC to work with all relevant partners to produce a new Air Quality Action Plan (AQAP) which although targeting action on the AQMA will include measures that benefit the entire town. There are no schools in the new AQMA, so there will not be a specific need to address this issue in this discrete area. There are however, schools nearby the revised AQMA which are likely to see improved air quality as a result of the new AQAP.

CBC has limited responsibility for air quality specifically around schools, and is not directly required to monitor pollution at schools. The CBC remit is much wider, as we are required to monitor and report on air quality across the whole borough. Despite this, some measurements of pollution have been, and are being, made around schools. Pollution levels around schools have also been modelled as part of the 2019 Detailed Modelling Study, available here:

[https://www.cheltenham.gov.uk/downloads/file/7829/detailed\\_modelling\\_assessment\\_2019](https://www.cheltenham.gov.uk/downloads/file/7829/detailed_modelling_assessment_2019)

Monitoring is generally aimed at assessing exposure to air pollution in residential settings, as this is where most exposure occurs. In the event that a school was in an AQMA there would be potential to identify parts of the AQAP that specifically deal with the school as both a source of pollution and the effects of that pollution.

Evidence from monitoring pollution levels and traffic patterns around Cheltenham suggests that pollution generated by the school run is a key issue in tackling AQ issues affecting the borough.

### **Summary of Evidence / Information**

CBC holds limited data specific to schools, largely because we are not required to specifically measure it. The Detailed Modelling Study used for assessing the AQMA boundary, which produced a NO<sub>2</sub> level of 25.9 / 27.6 ug/m<sup>3</sup> at two locations immediately adjacent to Gloucester Road School. We have now introduced monitoring outside this school to both verify this model and measure current levels, although these will have been radically affected by the drop in traffic throughout the lockdown period, where sites have averaged a 40% reduction in NO<sub>2</sub> levels.

There is only one other school where a detailed monitoring location was completed as part of this project, largely due to very few schools being positioned on the main roads that are the principal source of air pollution. That school was Cheltenham College, where a kerbside level of 25.4 ug/m<sup>3</sup> was predicted.

Other sources of monitoring pollution levels around schools include monitoring carried out by or on behalf of GCC. In 2017, a survey was completed that attempted to quantify the difference in pollution levels between in-term and half-term holidays. This project was very limited in its scope and not well executed, resulting in inconclusive data. Data may also be provided in planning applications, relating to specific sites. There are also a growing number of private monitoring sites, sometimes being run under the umbrella of various organisations. These results are generally not reliable enough for legislative use, as they use uncalibrated equipment, which is not necessarily installed in an appropriate location.

There are therefore no schools in the revised AQMA, or in areas needing further investigation, and levels at the schools most likely to be affected are well within the limit value of 40ug/m<sup>3</sup>. We can conclude that schools in Cheltenham are not significantly affected by adverse air quality, however, the travel choices of parents likely make a significant contribution to pollution levels around schools and the wider area.

This current situation should not deter us all from taking steps to try and improve both the impact on air quality of the school run, and the impact of any poor air quality around schools.

### **Next Steps**

“No idling zones”

Members have queried our ability to fine motorists who leave vehicles idling unnecessarily. There are powers in The Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002, but they are only available for use when adopted by a council, and only applicable within an AQMA. The law requires an enforcement officer (in practice usually a traffic warden) to warn the vehicle driver first, then issue a fixed penalty notice if there is no compliance. In practice, most drivers either turn off their engine, or drive off to avoid enforcement. A significant limitation of these regulations is that the penalty fee is fixed at £20.

Very few councils have adopted these powers and the ones that have tend to be the most urban. Very few penalties have been issued, making the legislation expensive to enforce. In July 2019, the Department of Transport consulted on higher fines and other changes to the legislation. As far as we can find, no report on this was ever produced and the legislation remains unchanged.

CBC also has other, less direct powers to explore which can have a beneficial effect on air quality:

- **Planning** (for houses, schools, employment, nurseries). Use of the planning system can prevent vulnerable uses from being built in areas of poor air quality, or mandate mitigation to reduce any harmful effect. It can also prevent development that would have a detrimental effect on air quality affecting vulnerable land use (including schools).
- **Car parking**. CBC currently relies quite heavily on car parking income from around 2,500 spaces when setting its balanced budget and whilst car parks do help to manage traffic volumes and congestion, that doesn't help to discourage car use. In the post-lockdown environment, the public has not taken back to public transport with much enthusiasm due to the higher perceived risk of Covid-19 transmission, so CBC needs to encourage walking and cycling, but may suffer financially if successful. The reliance on income from car parks which helps support a range of discretionary services, needs detailed consideration in terms of both financial sustainability and the carbon neutral aspiration. Currently, there is no obvious 'quick win' to replace the level of income which car parking has historically generated, but we are looking at the potential for alternative uses on a number of sites and the pros and cons of these options, with a view to reducing the Council's current reliance on parking income.

These issues will be amongst those given full consideration in the development of the revised AQAP over the coming 12 months.

#### **GCC Plans with "Streets for Schools" update.**

CBC EHOs had a meeting with GCC Officers in February, during which Streets for Schools was discussed, and in particular a list was put forward of schools which might be suitable, either due to their location / infrastructure, or because they were thought to be more adversely affected by air pollution.

During lockdown nothing was heard back from GCC until local media reported that their Cabinet had approved a trial of "Streets For Schools" at 3 locations in the county: Warden Hill Primary School, Tewkesbury CofE School and Kingsholm School (Gloucester).

We have now re-started discussions with their officers involved in the project, who have provided the following information:

The GCC Cabinet approved a pilot scheme involving 3 schools, intended to commence in September 2020. The schools had not previously been consulted or invited to take part. The scheme will close roads in the immediate vicinity of the school for 30-60 minutes during the morning and afternoon school run. Closures will be enforced by a Traffic Regulation Order, so will be enforceable by fixed penalty notices. As the scheme comes into effect the GCC Think Travel service will work with schools and parents to encourage change in how children travel, rather than just dropping off where the road closes. This may include projects to include walking and cycling, for example a "walking bus". Due to the decision being taken just before the school holidays, and the effect of the Covid 19 closures on schools, GCC now doesn't expect any of the 3 schools to be ready to start the scheme in September, so GCC are targeting a post half-term time frame. The project has also been stalled by a lack of data relating to existing travel choices, which needs to be available in some detail. In particular, although schools may know how children arrive at school, they don't know whether existing car use forms part of a longer commute or is a return trip to home, and this has not been recorded in the past.

CBC has offered to assist GCC with the pollution monitoring element of this project, including managing remote equipment at sites outside the borough. CBC has recently deployed a network of monitors across the borough, which offers real-time monitoring of various pollutants, which could be extended to 3 additional sites. Discussions will continue over the upcoming weeks to determine how we can be involved in this project. Members should bear in mind that this is a long-term project, and it will take at least a year to assess any resultant change.

**What can schools do themselves?**

Schools are recommended to prepare a School Travel Plan (STP). This should encourage active travel choices amongst staff, parents and pupils. The plan should actively discourage the use of cars on the school run, or promote car sharing where absolutely necessary. Schools can also actively discourage parking outside the school gates and vehicle idling. When managed and promoted well, schools can use such schemes as an example of positive community engagement, rather than being stigmatised as a “polluted” site. CBC can assist with a STP where information or data is requested.

**Background Papers Information**  
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**Accountability**

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