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Reference:	**ASR18-030**
Date of issue	**August 2018**

Annual Status Report

The Report sets out the Annual Status Report, which forms part of the Review & Assessment process required under the Environment Act 1995 and subsequent Regulations.

The Local Authority has two AQMA's (AQMA2 and AQMA3) declared in 2002 and amended in 2010. A further AQMA was revoked in 2007. Both of these current AQMA's are within the central area of the city and are declared for exceedance of the annual mean objective for nitrogen dioxide.

Since the last ASR in 2017, the Council have used results of air quality modelling carried out as part of the Clean Air Zone feasibility study to review the status of current AQMAs in the City. This appraisal will not address any aspects of the development of measures in relation to the options for a Clean Air Zone.

This report also makes reference to a detailed assessment within this appraisal report. It has not been appraised as a separate report as it has not included full details of the modelling assessment and has only included summary results.

Recent monitoring summarised in previous ASR's acknowledged that there were exceedances of the annual mean objective for nitrogen dioxide outside of existing AQMAs. Additionally, there has been evidence that AQMA3 has been meeting objectives.

Full details of the CAZ modelling were not available, but the ASR concludes that , without further action to reduce nitrogen dioxide emissions, NO_2 levels at some locations in Nottingham will continue to exceed the annual mean AQO until, and probably beyond, 2020.

As a result, the Council have proposed:

- The extension of the boundary of AQMA2 for exceedance of the annual mean objective, to correspond to the Nottingham City boundary
- To revoke AQMA3

The strategic objectives for the LTP have been linked to the 2030 vision for the Sustainable Community Strategy.

The current AQAP is integral with the 2011-2026 Local Transport Plan. Air Quality is considered within Chapter 7, for measures to promote Safe, Independent and Active Healthy Lifestyles.

Air Pollution is appropriately considered as an adverse impact from transport, primarily caused by high levels of traffic and stationary, slow moving or congested traffic within the city.

The ASR demonstrates that the City Council continues to pursue a positive approach to addressing air quality issues within the context of transport driven solutions, demonstrated by the vision statement within the LTP:

> *"We want to see a culture change amongst Nottingham's citizens and visitors, where walking, cycling and public transport becomes the logical first choice. We aim to tackle congestion, assist in city economic regeneration and promote greater accessibility and equality of opportunity which will contribute to a safer and healthier environment, whilst also reducing emissions and reducing carbon consumption.*

We note the comment in the ASR, that: *"The current Air Quality Action Plan (AQAP - embedded within the Local Transport Plan) is focussed solely on reducing emissions from road transport. The AQAP will be revised to cover all significant sources and promote the transition to plant/equipment with lower or zero emissions at point of use".*

The ASR notes that actions to improve air quality will be integrated across key local policies and plans, notably:

- Nottingham Local Plan
- Nottingham Local Transport Plan
- Nottinghamshire Air Quality Strategy (revised strategy due in Autumn 2018)
- Air Quality Action Plan

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The ASR concludes that the current local transport plans and programmes continues to:

- constrain traffic growth in the City area,
- reduce traffic levels and congestion by facilitating and promoting a comprehensive public transport network, with integrated ticketing,
- encourage and facilitate walking and cycling (active travel)
- encourage and facilitate the transition to Zero and Ultra-low Emission Vehicles

The ASR concludes, *"Detailed air quality modelling of nitrogen dioxide emissions and dispersion predict that, without further action to reduce nitrogen dioxide emissions, NO_2 levels at some locations in Nottingham will continue to exceed the annual mean AQO until, and probably beyond, 2020".*

On the basis of the evidence provided by the local authority the conclusions reached are acceptable for all sources and pollutants, with the provisos listed in the commentary below.

Following the completion of this report, Nottingham City Council should submit the next Annual Status Report in 2019.

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Commentary

The report is well structured, detailed, and provides the information specified in the Guidance. The Council have an Action Plan that has been developed within the Local Transport Plan.

1. The City Council are proposing to declare a city-wide AQMA, by amending AQMA2 and revoking AQMA3.
2. Based upon the outcome of recent monitoring and air quality modelling provided in the report, we support this proposal.
3. The Council may wish to consider the option of the fast track process for declaring the new AQMA as detailed within Chapter 4 of LAQM Policy Guidance 2016.
4. The Council continues to provide a detailed summary of ongoing work in the City, based upon objectives linking the Sustainable Community Strategy to the Strategic Objectives for Transport, as expressed with the LTP.
5. The City Council has a clear focus in relation to policies and plans for promoting sustainable transport and developing transport based solutions that will contribute to the strategic objectives for Transport, including reducing carbon and air pollution emissions.
6. An example within the LTP highlights (Table 2.4) that congestion on main routes into and out of the city and around the ring road during peak times is a major challenge. There is reference (RC1) to targeting capacity improvements at congestion hot spots.
7. The outcomes of recent monitoring and modelling suggest there may be exceedances of air quality objectives beyond 2020.
8. It is understood that the current Action Plan has been developing within the context of the ongoing LTP programmes. The priorities to improve air quality as listed within the ASR appear as appropriate to continue to deliver LTP priorities.
9. A future challenge for the Council, will be to provide an update to the Action Plan within the ASR that provides sufficient detail of how measures may be expected to deliver the air quality objectives within specified timescales.
10. The submission of the Annual Status report continues amidst the development of measures towards delivering the air quality objectives based upon a Clean Air Zone, which is being addressed as a separate initiative to this report. Hence the development of CAZ measures will not be considered further within this appraisal.

11. However, it will be important in future ASR reports to ensure that CAZ measures are incorporated into Table 2.2 for annual updating and review in the ASR, in relation to a capacity to deliver a stated level of emissions reduction, as required to achieve the air quality objectives. There is no current evidence that the Council have completed such an assessment. Without a knowledge of required emissions reductions, and an accompanying assessment of proposed action plan measures, we have no clear evidence of the capacity of measures to deliver the air quality objectives.
12. The Council are reminded that the process for developing effective measures to reduce emissions in AQMAs is clearly described for the development of Air Quality Action Plans, within the latest Policy and Technical Guidance from Defra, particularly Chapter 2 of LAQM TG(16), which details the recommended approach for developing an action plan. The basis of the approach involves gaining an understanding of the current level of excess emissions giving rise to the air quality exceedance, with knowledge from a source apportionment of which pollution sources are contributing to the excess. Without this approach, there is no basis for assuming that measures that are otherwise prescribed to reduce emissions are likely to be effective. These principles should be used to underpin the development of all future action plan measures.
13. There is significant evidence that the Council, together with the Transport Authority have a clear understanding of the links between options to control traffic congestion, linked to potential reductions in road transport emissions, and improvements in air quality and reductions in carbon emissions.
14. However, what is not clear from examination of the LTP implementation plans and details within Action Plan measures Table 2.2, is to what extent management of traffic congestion, is assessed in terms of delivering emissions reductions, particularly in areas where there are known air pollution hotspots and exceedances of air quality objectives.
15. This process is described in detail within the latest Technical Guidance LAQM TG(16) from Defra in Chapter 2, Section7.104-106 and Box 7.6. The Guidance makes clear that:
16. *"The AQAP should only be considered in detail once the source and extent of the problem are clearly understood".* [Ref: LAQM TG(16) para 2.30]
17. Hence air pollution emissions reduction targets, should underpin the further development of Action Plan.

18. The latest Technical Guidance LAQM TG(16), para 2.69 makes clear, as a minimum AQAP's should include the following:

- Quantification of source contributions (e.g. HGVs, buses, taxis, other transport, industrial or domestic sources etc.) responsible for the exceedance of the relevant objective; knowing the source of the problem will allow the AQAP measures to be effectively targeted;
- Quantification of impacts of proposed measures including, where feasible, expected emission and concentration reductions (either locally obtained and/or via national monitoring/modelling statistics). It is important that the local authority shows how it intends to monitor and evaluate the effectiveness of the plan.

This commentary is not designed to deal with every aspect of the report. It highlights a number of issues that should help the local authority either in completing the Annual Status Report adequately (if required) or in carrying out future Review & Assessment work.

Issues specifically related to this appraisal can be followed up by returning the attached comment form to Defra, Welsh Assembly Government, Scottish Government or DOE, as appropriate

For any other queries please contact the Local Air Quality Management Helpdesk:
Telephone: 0800 0327 953
Email: LAQMHelpdesk@uk.bureauveritas.com

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Appraisal Response Comment Form

Contact Name:	
Contact Telephone number:	
Contact email address:	

Comments on appraisal/Further information: