Revocation Assessment Report for The Suffolk Coastal District Council Air Quality Management Area Order No. 3, located at Stratford St. Andrew

August 2024

The Suffolk Coastal District Council Air Quality Management Area Order No. 3 Revocation Assessment

Introduction

This screening assessment sets out the evidence relied upon by East Suffolk Council ("the Council") as it seeks to revoke the Suffolk Coastal District Council Air Quality Management Area (AQMA) Order No. 3 (located at Stratford St Andrew, and declared prior to the Council's merger). Consideration will be given to:

- The monitoring data obtained over a number of years within the AQMA;
- The projected roadside NO_2 concentration;
- Local and national trends in NO_2 emissions; and
- Local and regional factors that may impact on the AQMA.

Part IV of the Environment Act 1995 (as amended 2021) requires Local Authorities to review air quality in its area and assess whether national objective levels will be achieved. Where it has been shown that the objectives will not be achieved Local Authorities must declare an AQMA and put an Air Quality Action Plan in place to bring air quality within acceptable levels.

Where it can be subsequently demonstrated that air quality objectives are being and will continue to be met a Local Authority can revoke an AQMA by Order under the Environment Act 1995 (as amended 2021).

The Suffolk Coastal District Council AQMA Order No. 3 was declared in 2014 following exceedance of the annual mean nitrogen dioxide (NO_2) national objective linked to emissions from road traffic. Since that time, monitoring has shown a continued reduction in pollutant values and levels have now been consistently below the national objectives for a number of years.

National, regional and local policies have influenced the reduction in polluting emissions within the AQMA and it is reasonable to expect that further reductions will be achieved through the increasing use of ultra-low and zero emission vehicles.

Having considered the historical monitoring data at sites within Stratford St Andrew, national trends in emissions and any likely impacts on the air quality within the AQMA the Council is satisfied that the AQMA can be revoked.

Review & Assessment

Part IV of the Environment Act 1995 (as amended 2021) (the Act) introduced the Local Air Quality Management regime that places a legal duty on local authorities to regularly review and assess air quality in their areas against Air Quality Standards (AQS) objectives. The AQS objectives for England are set out in the Air Quality (England) Regulations 2000 and the Air Quality (England) (Amendment) Regulations 2002 and are shown in Table E.1 of the East Suffolk 2024 Annual Status Report (ASR).

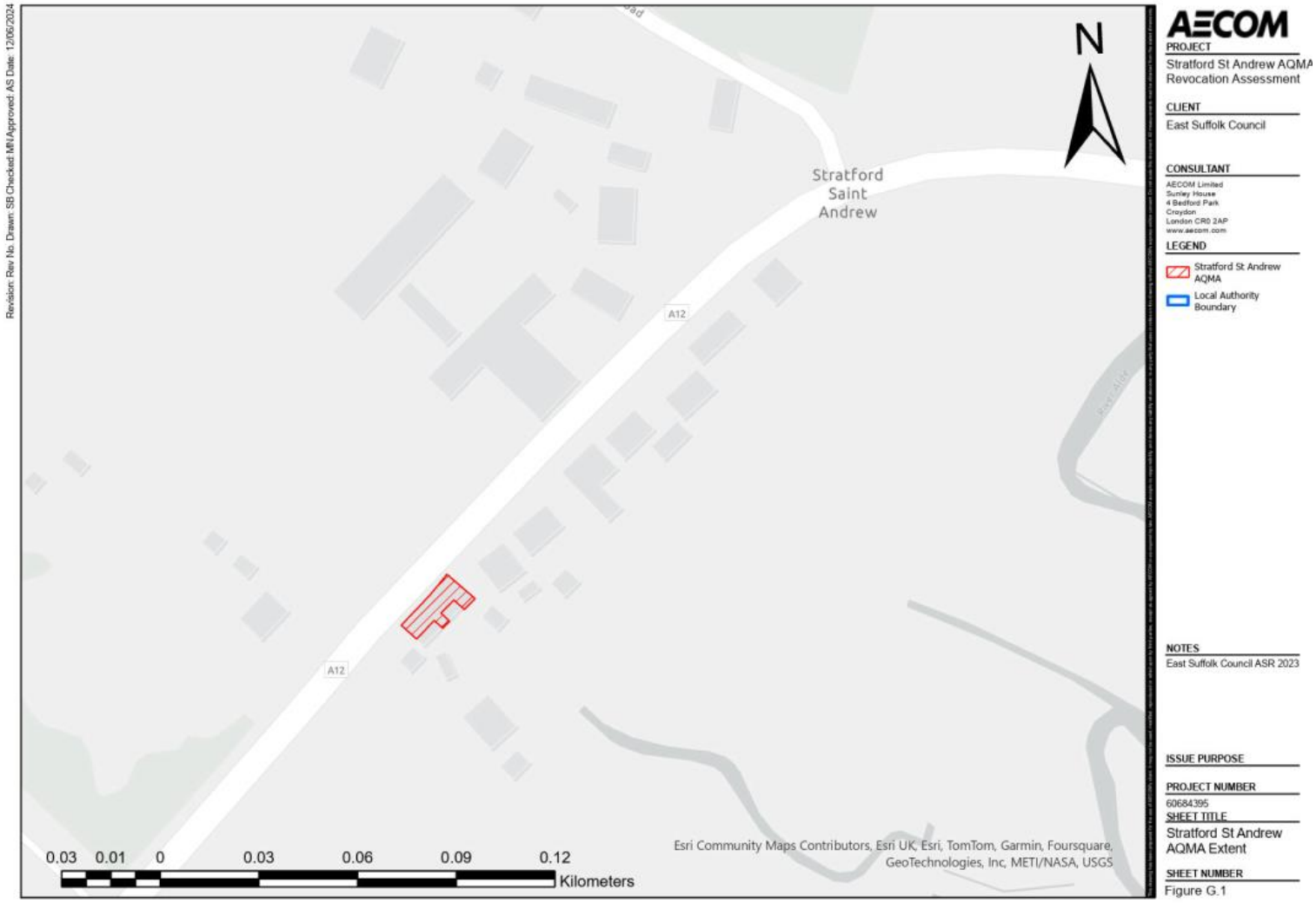
Local authorities must declare an AQMA where any of the AQS objectives are exceeded and subsequently set out the measures they intend to put in place to secure compliance with the AQS objectives under an Air Quality Action Plan (AQAP). With effective implementation of the Action Plan and national policies aimed at reducing the emission of pollutants it is expected that the air quality within AQMAs should improve to a point that concentrations will remain below the AQS objectives. Revocation of an AQMA can be formally declared by Order under section 83 of the Environment Act.

Each year an ASR must be prepared by local authorities detailing the strategies employed to improve air quality and any progress that has been made. Comments made by Defra in relation to the 2023 ASR support the Council's plans to revoke the Suffolk Coastal District Council AQMA Order No. 3, due to continual compliance with the NO_2 annual mean AQS objective.

Suffolk Coastal District Council AQMA Order No. 3

The Suffolk Coastal District Council AQMA Order No. 3 (located in Stratford St Andrew) was declared in 2014 to address traffic related NO_2 concentrations in excess of the annual mean AQS objective. The AQMA encompasses four properties situated within 1-5 Long Row, Main Road, in Stratford St Andrew, Suffolk. The extent of the AQMA, as declared under the original order, is demonstrated in Figure 1 .

Figure 1 - Suffolk Coastal District Council AQMA Order No. 3 Extent



Revoking an AQMA: The Legal Framework & Guidance

The Environment Act 1995 (as amended 2021)

Section 83 (2b) of the Environment Act (1995) states that an AQMA:

"…..may, as a result of a subsequent air quality review, be revoked by such an order, if it appears on that subsequent air quality review that the air quality standards and objectives are being achieved, and are likely throughout the relevant period to be achieved, within the designated area".

Statutory Guidance

Guidance on the requirements for revoking an AQMA are set out in statutory guidance LAQM PG 22 and LAQM TG 22.

PG 22 states that:

- *"Authorities wishing to revoke or reduce an AQMA can do so following review. For revocation this should demonstrate that air quality objectives are being met and will continue to do so. In other words they should have confidence that the improvements will be sustained. Further information is provided in the Technical Guidance, but typically this is after three years or more compliance. It is not advisable for the revocation of an AQMA to be based solely upon compliance in a year not representative of long-term trends. For example, compliance being reached in 2020 may not be representative of long-term trends in pollutant concentrations due to the change in activity observed across the UK as a result of COVID-19. Where 2020 is one of many consecutive years of compliance, this may be considered for revocation. If authorities wish to make any changes to AQMAs, whether declaration, amendment or revocation, based upon 2020 data, please contact the LAQM helpdesk to discuss your approach.*
- *Where an Order is revised, a copy of the revocation or amendment Order should be submitted to Defra via the LAQM portal and other statutory consultees and made publicly available to ensure the public and local businesses are aware of the situation. It is expected that the local authority will take the relevant action imposed by the Order within four months following receipt of comments from Defra.*

- *Following a revocation, from 2023 (where this would result in that local authority no longer having any AQMA) the local authority should put in place a local air quality strategy (paragraph 2.15) to ensure air quality remains a high profile issue and to ensure it is able to respond quickly should there be any deterioration in condition."*

TG 22 goes on to state that:

- *"In most cases the decision to amend or revoke an AQMA should only be taken following a detailed study, to be appended to the ASR/APR as additional supporting technical information. A modelling study may allow compliance to be assessed over a wider geographical area than when compared to monitoring alone. This should set out in detail all the available information used to reach the decision, with the same degree of confidence as was provided for the original declaration. If the conclusions of the study are suitably robust to allow an assessment of compliance to be determined, either an amendment or revocation can be taken forward. Due to the inherent uncertainties of dispersion modelling, consideration should be given to predicted concentrations being 10% below the relevant objective before an amendment or revocation of an AQMA is completed.*
- *It is not advisable for the revocation of an AQMA to be based solely upon compliance in a year not representative of long-term trends. For example, compliance being reached in 2020 may not be representative of long-term trends in pollutant concentrations due to the change in activity observed across the UK as a result of COVID-19 and associated lock down measures. Where 2020 is one of many consecutive years of compliance, this may be considered for revocation.*
- *However, in some instances if compelling evidence exists, detailed modelling to support the decision to amend/revoke an AQMA may not be necessary and an AQMA may be amended or revoked following a screening assessment or on the basis of robust monitoring evidence.*
- *However, pollutant concentrations may vary significantly from one year to the next, due to the influence of meteorological conditions, and it is important that authorities avoid cycling between declaring, revoking and declaring again, due simply to these variations. Therefore, before revoking an AQMA on the basis of measured pollutant concentrations, the authority therefore needs to be reasonably certain that any future exceedances (that might occur in more adverse meteorological conditions)*

are unlikely. For this reason, it is expected that authorities will need to consider measurements carried out over several years or more, national trends in emissions, as well as local factors that may affect the AQMA, including measures introduced as part of an Air Quality Action Plan, together with information from national monitoring on high and low pollution years.

- *The revocation of an AQMA should be considered following three consecutive years of compliance with the relevant objective as evidenced through monitoring. Where NO_2 monitoring is completed using diffusion tubes, to account for the inherent uncertainty associated with the monitoring method, it is recommended that revocation of an AQMA should be considered following three consecutive years of annual mean NO_2 concentrations being lower than 36 µg/m^3 (i.e. within 10% of the annual mean NO_2 objective). There should not be any declared AQMAs for which compliance with the relevant objective has been achieved for a consecutive five-year period."*

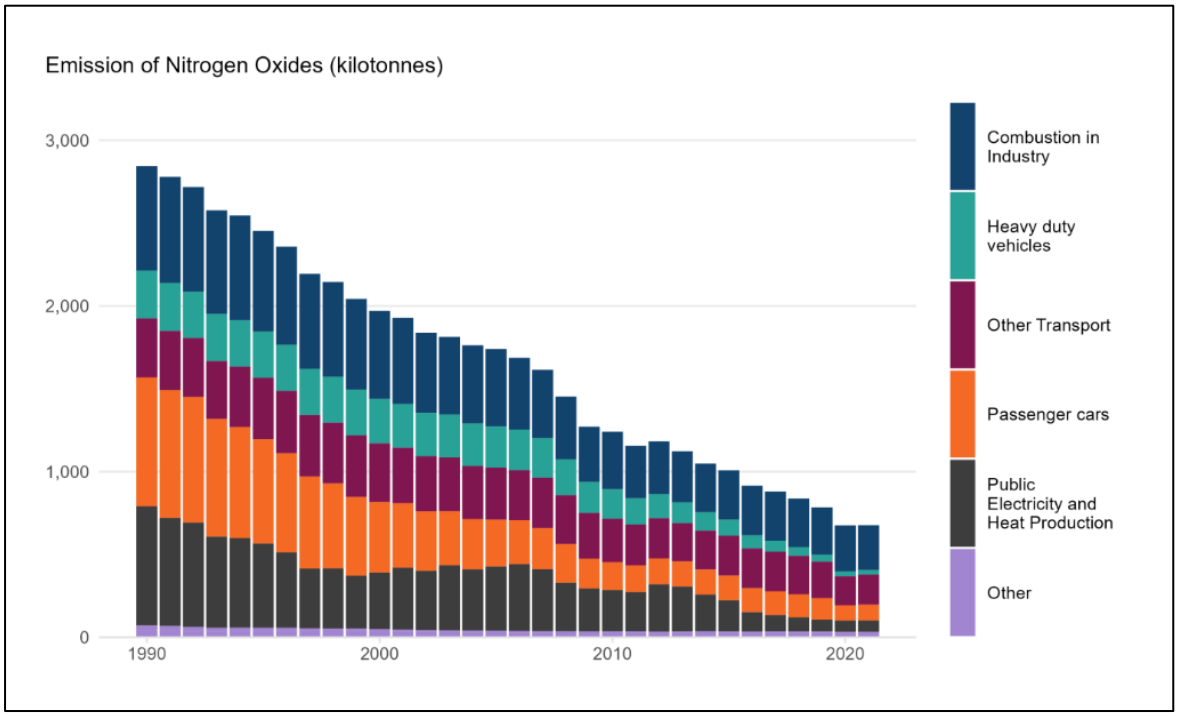
Therefore, where compelling evidence exists, an AQMA can be revoked following at least three consecutive years of compliance with the objective without the need for detailed modelling as would traditionally have been required under the technical guidance. That is to say that NO_2 concentrations monitored using diffusion tubes should have been lower than 36 µg/m^3 to account for the uncertainty inherent with the method for a period of three years or more, acknowledging wider trends or new sources that might impact continued compliance.

This report compiles the evidence required to revoke the Suffolk Coastal District Council AQMA Order No. 3.

National Influence

National strategies, policies and plans have and will continue to influence local polluting emissions. Total UK emissions of NO_x fell by over 40% between 1990 and 2021. Figure 2 shows that total NO_x emissions have decreased substantially over this period and are now less than one third of the total emissions in 1990. Emissions from several specific sources, notably public energy and heat production, passenger cars and heavy-duty vehicles, have also shown substantial decreases over the same period[1].

Figure 2 - Estimated Annual UK Emissions of Nitrogen Oxides (kt), 1990 – 2021 (Source: NAEI 2023)



Future influence on emissions is considered in a revised Clean Air Strategy[2] with a major transport emission objective that states:

"*We will end the sale of new conventional petrol and diesel cars and vans by 2040. We will position the UK as the best place in the world to develop, manufacture and*

[1] Defra, September 2023, 'Air Pollution in the UK 2022 Report'

[2] Department for Transport (DfT), January 2019, 'Clean Air Strategy 2019'

use zero exhaust emissions vehicles and, during the transition, we will ensure that the cleanest conventional vehicles are driven on our roads'".

This transition to ultra-low and zero emission vehicles presents the largest potential for the reduction of future road traffic emissions in this AQMA. Department for Transport (DfT) road traffic forecasts[3] provide future numbers, compositions and emissions across the UK based on seven scenarios (to account for the broad range of possibilities and uncertainties in predicting up to 2060) linked to changing population, economic and social well-being and technological changes. The findings include:

- From 2025, traffic is projected to grow between 8% and 54% by 2060;
- Traffic on minor roads and A-roads is expected to grow by 21% and 20% respectively, while motorway traffic is projected to increase by 27% between 2025 and 2060;
- Between 2025 and 2050 NO_x emissions are projected to reduce by 65%, driven by the uptake of Euro 6 engines. However, as the uptake of Euro 6 engines flattens off the impact of greater travel increases NO_x by 1% between 2050 and 2060;
- Heavy Goods Vehicles (HGV) traffic is projected to have a moderate increase from 16 Billion (Bn) vehicle miles in 2025 to 18 Bn vehicle miles in 2060;
- Light Goods Vehicles (LGV) growth is stronger starting at 57 Bn vehicle miles in 2025 rising to 77 Bn by 2060; and
- Congestion (measured in delay per mile) is also projected to increase, with the average delay per mile projected to increase around 27% between 2025 and 2060.

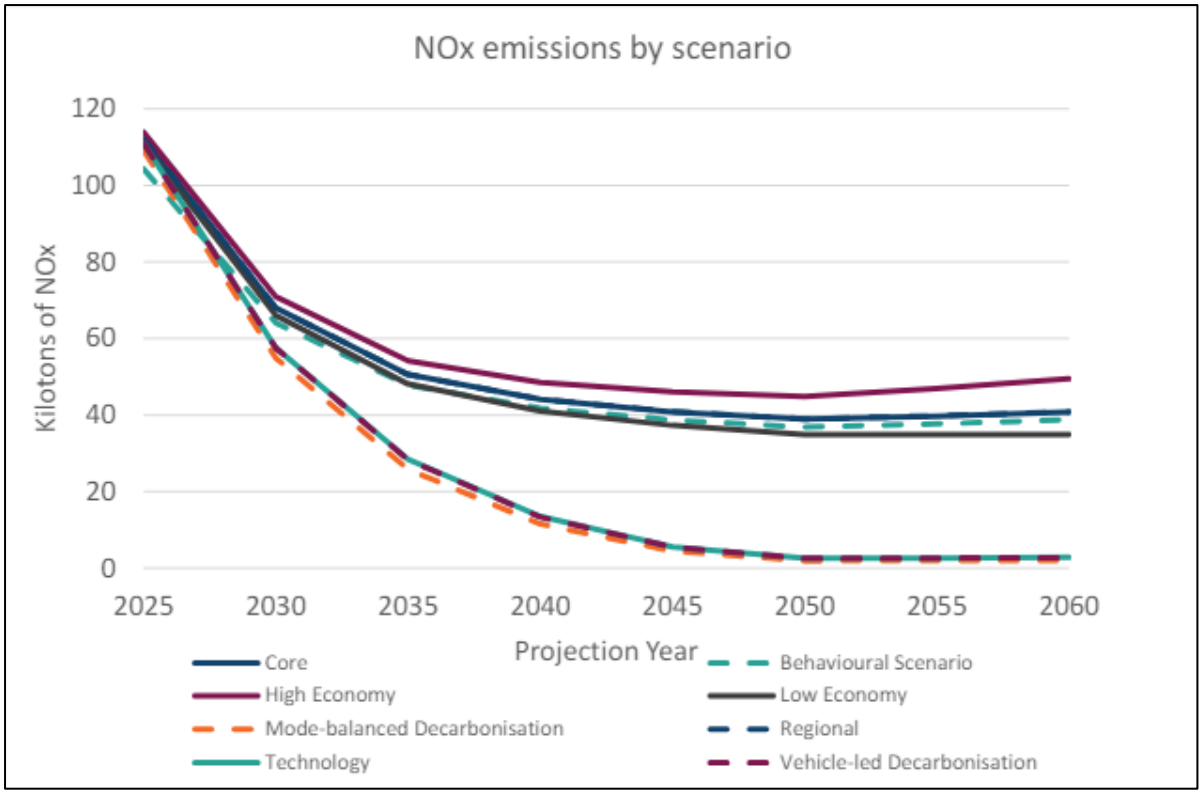
The national transport model (NTM) produces forecasts of emissions of Carbon Dioxide (CO_2), NO_x and PM_{10} measured at the tailpipe (though this does not capture any upstream emissions produced) as shown in Figure 3. A set of seven scenarios which explore uncertainties in demography, economic growth, regional redistribution, behavioural change, emerging technologies, and decarbonisation, have been developed for use in modelling and appraisal. The projections illustrate that a wide

[3] Department for Transport (DfT), December 2022, 'National Road Traffic Projections 2022'

range of traffic growth is possible in the long term, with the scenarios suggesting an 8% to 54% increase in distance driven between 2025 and 2060, though in this context the uncertainty in these figures should be noted.

Even if this nationally predicted increase in traffic growth is realised at the local level within Stratford St Andrew, associated NO_x emissions are also projected to reduce by between 61% (in the High Economy Scenario) and 98% (in the Mode-balanced Decarbonisation Scenario) between 2025 and 2060, primarily due to fleet turnover.

Figure 3 - Forecast NO_x Road Traffic Emissions (kt) for England & Wales (Source: Department for Transport)



As already highlighted in East Suffolk's 2021 ASR, COVID-19 also had notable impacts on NO_2 concentrations in 2020. The Air Quality Expert Group (AQEG) has estimated that during the initial lockdown period in 2020, within urbanised areas of the UK, reductions in NO_2 annual mean concentrations were between 20 and 30% relative to pre-pandemic levels, which represents an absolute reduction of between 10 to 20 $\mu g/m^3$ if expressed relative to annual mean averages[4].

[4] Air Quality Expert Group (AQEG), June 2020, 'Estimation of changes in air pollution emissions, concentrations and exposure during the COVID-19 outbreak in the UK'.

The above considered, it is therefore likely that despite uncertainty in predicting such trends, the nationally projected reductions in overall NOx emissions will continue to contribute toward reducing concentrations within the AQMA, below their current level.

Regional Influence

Local Plan

The Suffolk Coastal Local Plan (SCLP) sets out a vision for the communities of the former Suffolk Coastal area up to 2036. The National Institute for Health and Care Excellence (NICE) encourages Local Authorities to address the issue of air pollution in their Local Plan. The SCLP seeks to improve air quality not only in AQMAs but across the plan area and elsewhere. In particular, development proposals are expected to minimise and mitigate air pollution and to contribute towards the achievement of air quality objectives.

The SCLP area comprises both urban and rural settlements and within certain parts there are limited public transport opportunities, resulting in a heavy reliance on private cars as a form of transport. Due to this, there has been a focus on sustainable transport mechanisms in the SCLP. This complements the Local Transport Plan (LTP), identifying changes that will secure an improved transport network and contributing to the shared priority of improving air quality.

Policy SCLP7.1: Sustainable Transport, impacts on air quality by regulating developments to ensure they encourage and facilitate the use of sustainable transport options where possible and support the efficient use of existing transport networks.

Developments are supported in the SCLP area only when:

- Any significant impacts on the highways network are mitigated;
- It is proportionate in scale to the existing transport network;
- All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken;
- It is located close to, and provides safe pedestrian and cycle access to services and facilities;

- It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking
- It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network;
- It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety; and
- The cumulative impact of new development will not create severe impacts on the existing transport network.

Other specific policies relevant to the improvement of air quality include Policy SCLP 10.3 Environmental Quality, which requires development proposals to protect the environment and minimise all forms of pollution where possible, including air pollution. Policy SCLP 11.2 Residential Amenity requires the Council to include air quality and pollution when considering the impact of a development on residential amenity.

Local Transport Plan (LTP)

The Suffolk County Council LTP (2011-2031) also provides a strategy for transport management until 2031. The plan prioritises the growth of business, reducing the demand for car travel, making efficient use of transport networks and improving infrastructure, which should all help to ensure continued compliance within the Suffolk Coastal District Council AQMA Order No. 3.

Of note is that the next LTP, LTP4[5], is currently in the process of being drafted, and will cover the period to 2040. This responds to the long-term transport opportunities and challenges facing Suffolk and the UK as a whole. Air Quality is anticipated to be a constituent part of LTP4, as follows, further ensuring improvements to emissions to air from road traffic are part of local policy in future:

"Health, Wellbeing and Social inclusion - Improve air quality in Suffolk, focusing on areas where transport related air quality is shortening the lives of Suffolk residents the most."

[5]Suffolk County Council, Local Transport Plan 4 2024-2040 Consultation, Available at: https://www.suffolk.gov.uk/asset-library/local-transport-plan-consultation.pdf

Air Quality Action Plan

The AQAP for the AQMA received Defra approval in March 2018 and consists of two short term, priority action measures and six longer term aspirational measures. The main priority measure, for Suffolk County Council to move the 30/50mph change of speed limit sign further south out of the village was undertaken in December 2017. The second priority measure 'Assessment of planning applications for impact on air quality' has been implemented by the ESC Environmental Protection Team for more than 20 years and is on-going. The other aspirational measures aim to ease congestion and reduce overall traffic flows, resulting in reduction in NO_2 emissions, specifically around the AQMA. These have been implemented to varying degrees, and can be summarised as follows:

Installation of speed cameras – Vehicular Activated Signs (VAS) just North, VAS North and South, policed speed camera and average speed cameras. Due to cost implications these were only to be considered should movement of speed limit not prove successful in reducing NO_2 concentrations within the AQMA, and have therefore not been installed.

Installation of a bypass – this has been agreed within the planning consent for Sizewell C and will be delivered by SZC Ltd. The two villages bypass build is estimated to take 18 months to two years from the start of construction and is due for completion end of 2026. This bypass will remove A12 traffic from the villages of Farnham and Stratford St. Andrew including the AQMA.

Mitigation measures for Sizewell C (SZC) – use of 92% Euro VI construction vehicles agreed as part of the Development Consent Order (DCO) - expectations are that they will actually achieve a higher percentage as companies have prepared and are using new vehicles. The applicant is also committed to: two off-site park and rides; a freight management facility; increased use of rail and sea; and an accommodation campus together with Construction Workforce Travel Plan, Construction Traffic Management Plan, Outline Dust Management Plan (DMP), Code of Construction Practice (CoCP). All of which should help to reduce emissions from SZC construction vehicles on the road network, including within the AQMA.

Air Quality Strategy

In 2021 East Suffolk Council published its first Air Quality Strategy, which aims to:

- Raise public awareness of the importance of air quality;
- Reduce emissions of $PM_{2.5}$ within the district;
- Encourage and enable active travel to benefit air quality and improve public health;
- Document the efforts made to improve air quality across the different areas of the Council.

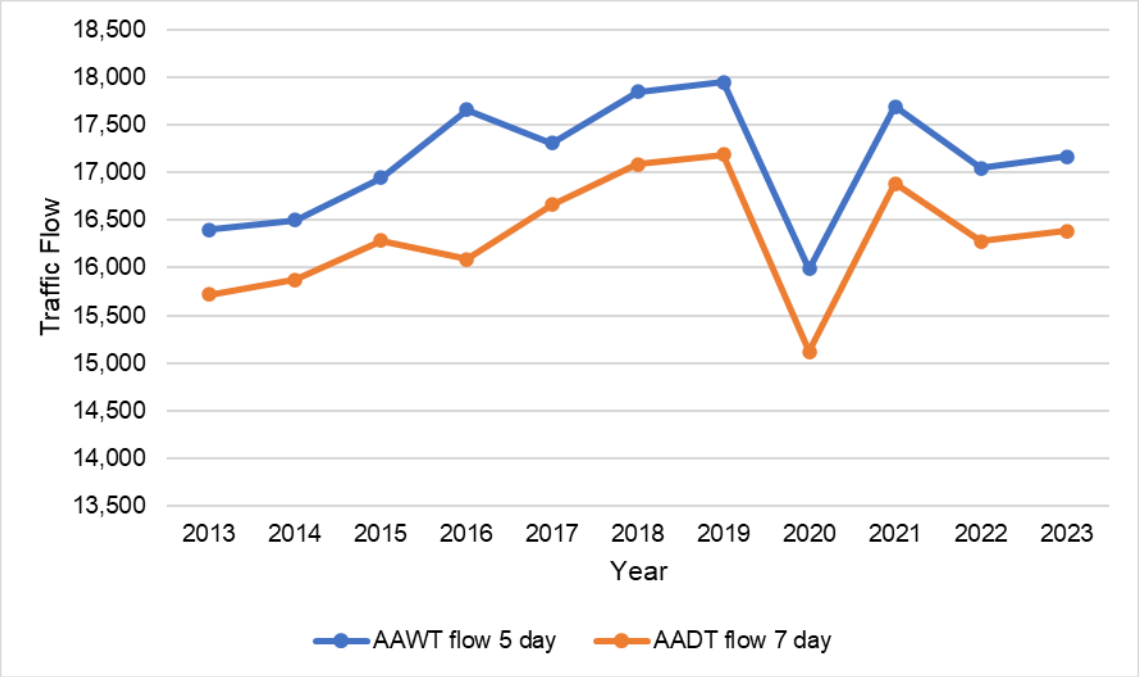
By setting a strategic direction on air quality at both district and county levels across the district, it is anticipated that greater improvements can be made, including within the AQMA. The strategy sets out a number of statutory and non-statutory obligations, ranging from sustainable transport to public information, that set the agenda the Council will be working towards in the coming years. As per paragraph 3.59 of LAQM.PG(22), if a local authority in England no longer has any declared AQMAs remaining, from 2023, the local authority should put in place a local air quality strategy to ensure air quality remains a high profile issue and to ensure it is able to respond quickly should there be any deterioration in condition.

That ESC already has the Strategy in place should serve to ensure that compliance with the objectives, where achieved, can be continually maintained.

Air Quality within Stratford St Andrew and the AQMA

As displayed in Figure 4, traffic volumes fell in 2020 during the pandemic but increased again in 2021. Flows were lower in 2022 but then increased slightly in 2023. It is likely that despite small increases in flow, air quality has continued to improve due to fleet emissions reductions, as older vehicles are replaced with newer, cleaner ones.

Figure 4 - Annual Average Daily Traffic (AADT) and Annual Average Weekday Traffic (AAWT) Flow from A12 Farnham from 2013 to 2023



A comparison of the annual mean AQS objective for NO_2 against the long-term monitoring results between 2011 and 2023 from diffusion tubes located within Stratford St Andrew and the AQMA can be seen in Figure 5.

Figure 5 - Trends in annual mean NO_2 concentrations at diffusion tube sites in Stratford St Andrew (2011 to 2023)

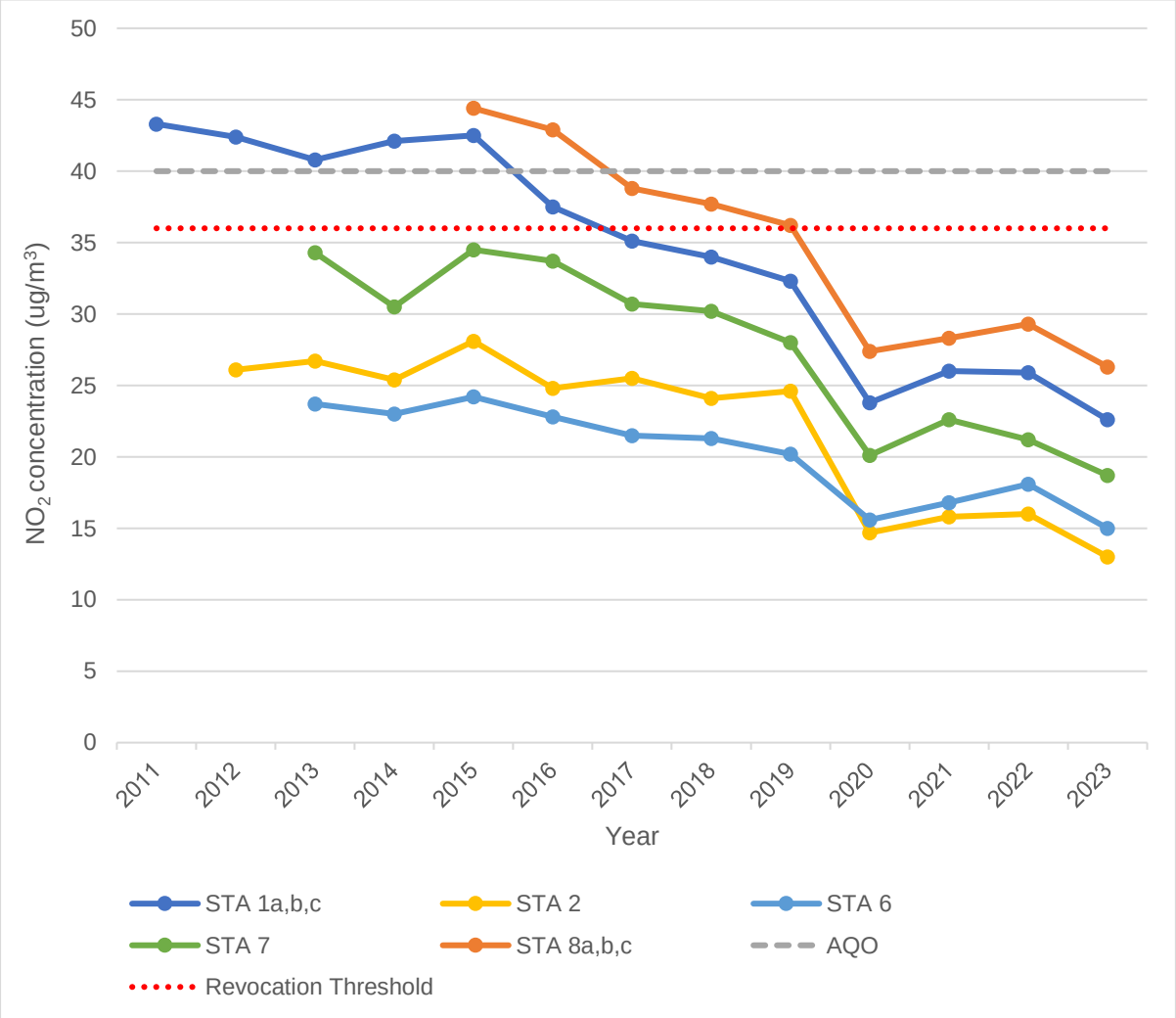


Figure 5 shows that all five monitoring locations within Stratford St Andrew, including sites STA 1 and STA 8 in the AQMA, recorded NO_2 concentrations that have been consistently below the annual mean AQS objective of 40 µg/m³ for six years (since 2017).

The AQMA last saw exceedances of the annual mean NO_2 objective in 2016, at site STA 8, measuring 42.9 µg/m³. NO_2 concentrations fell each year thereafter for 4 years until 2020, and then have risen slightly in 2021 and 2022, relative to 2020, but decreased again in 2023. Measurements in 2020 across all five monitoring sites were expected to be low due to the impacts of the Covid-19 lockdowns reducing traffic flows

using this route (see Figure 4). The maximum annual mean NO_2 concentration recorded in 2021 was 28.3 µg/m^3 at site STA 8 and concentrations rose slightly in 2022 to 29.3 µg/m^3. In 2023, concentrations decreased again, with levels at STA 8 measuring 26.3 µg/m^3.

The Defra helpdesk was consulted in 2022 and advised that where NO_2 monitoring is completed using diffusion tubes (as within this AQMA), to account for the inherent uncertainty associated with the monitoring method it is recommended that revocation of an AQMA should be considered following three consecutive years of annual mean NO_2 concentrations being lower than 36 µg/m^3 (i.e. within 10% of the annual mean NO_2 objective).

The AQMA has achieved compliance with the annual mean NO_2 objective of 40 µg/m^3 for six consecutive years (from 2017 to 2023), but has only been outside of 10% of the objective (<36 µg/m^3) for four consecutive years (from 2020 to 2023)[6]. However, these four years include monitoring data within the years of 2020 and 2021, for which the Defra Helpdesk has advised that this data is likely to have been impacted by the COVID-19 pandemic. Section 3.54 of LAQM TG.22 states that:

"It is not advisable for the revocation of an AQMA to be based solely upon compliance in a year not representative of long-term trends. For example, compliance being reached in 2020 may not be representative of long-term trends in pollutant concentrations due to the change in activity observed across the UK as a result of COVID-19 and associated lock down measures".

ESC therefore did not proceed with the revocation at that time.

While this was a conservative approach, the Defra Helpdesk reiterated that the purpose of the AQMA is to tackle exceedances of the AQ Objectives, which in this case, have been met. They have since advised (in consultation in 2023, and through appraisal feedback on the 2023 ASR) that unless a likely exceedance has been identified in 2023, they recommend the AQMA is revoked, and a robust local air quality strategy is developed. After such discussions, East Suffolk Council consider that the revocation now has the support of Defra, especially considering that the ESC AQ Strategy is already in place and due to be updated 2024/25.

---

[6] It should be noted that this was only by a very narrow margin. The highest monitored concentration in 2019 was 36.2 µg/m^3, so only marginally within this criteria.

Predicted Trends

To provide confidence that compliance with the objective will continue, Defra's Roadside NO_2 Projection factors (Table 1) have been used. The 2023 monitored concentrations have been projected forward five years (2024-2028) to demonstrate concentrations are expected to remain below the AQS objective. The adjustment factors applied for Stratford St Andrew were the 'Rest of UK HDV=<10%'. The projected results for the diffusion tube locations within Stratford St Andrew and it's AQMA are presented in Table 2.

Table 1 - Defra's Roadside NO_2 Projection Factors

Roadside NO_2 Projection Factors

Year	Central London	Inner London	Outer London	Rest of UK (HDV = <10%)	Rest of UK (HDV >10%)
2018	1.000	1.000	1.000	1.000	1.000
2019	0.813	0.909	0.945	0.953	0.942
2020	0.766	0.811	0.878	0.906	0.889
2021	0.740	0.767	0.829	0.855	0.835
2022	0.715	0.727	0.775	0.807	0.785
2023	0.696	0.693	0.738	0.765	0.743
2024	0.676	0.661	0.695	0.724	0.703
2025	0.660	0.634	0.657	0.686	0.667
2026	0.652	0.616	0.630	0.653	0.637
2027	0.645	0.598	0.606	0.622	0.610
2028	0.638	0.580	0.582	0.595	0.587
2029	0.632	0.563	0.560	0.571	0.566
2030	0.626	0.546	0.542	0.550	0.549

Table 2 - 2023-based Projected Annual NO_2 Mean Concentrations - Stratford St Andrew

Site	Within Suffolk Coastal District Council AQMA Order No. 3?	Monitored Annual NO_2 mean concentration ($\mu g/m^3$)	Projected Annual NO_2 mean concentration ($\mu g/m^3$)				
		2023	2024	2025	2026	2027	2028
STA 1a,b,c (1 Long Row, Main Road)	YES	22.6	21.4	20.3	19.3	18.4	17.3
STA 2 (Opposite 1-5 Long Row, Main Road)	NO	13.0	12.3	11.7	11.1	10.6	9.9
STA 6 (Jacobs Cottage)	NO	15.0	14.2	13.5	12.8	12.2	11.5
STA 7 (On Road past 5 Long Row, Main Road)	NO	18.7	17.7	16.8	16.0	15.2	14.3
STA 8a,b,c (5 Long Row, Main Road)	YES	26.3	24.9	23.6	22.4	21.4	20.1

Whilst the above table does not account for variability caused by the major developments latterly discussed, from Table 2 it can be observed that the forecasted concentrations of NO_2 decrease over the five-year period, and remain well below the AQS objective. The Government's commitment to net zero[7] emissions by 2050 and the adoption of the Road to Zero[8] transport strategy are expected to deliver significant further reductions in emissions from road transport. In its publication 'National Road Traffic Projections 2022'[3] the DfT has projected that NO_x emissions will decline by

[7] HM Government, October 2021, 'Net Zero Strategy: Build Back Greener'

[8] Department for Transport, July 2018, 'The Road to Zero'

64% from 2025 to 2060. In turn, this provides confidence that the AQMA can be revoked without concern that the objective will be exceeded, unless significant new sources arise, at which point the NO_2 concentrations will be assessed again. The Council intend to continue with a monitoring regime in order to observe this.

Local Development

DCOs have been granted for SZC new nuclear power station, East Anglia ONE North and East Anglia TWO (EA1N and EA2) Offshore Windfarms, which it is recognised may have an impact on traffic travelling on the A12 through Stratford St Andrew and the AQMA, with Sizewell C being the largest development of the three.

All three developments have had detailed air quality assessments submitted at the time supporting the applications, which the Council have had independently reviewed. None are assessed to cause significant impacts directly within Stratford St Andrew and the AQMA, however increases in traffic created by these schemes could increase emissions in the vicinity of the AQMA and so should be incorporated into decision making around revocation.

Taking forward any of the aspirational measures from the AQAP within the AQMA has been put on hold whilst awaiting the outcome of the Sizewell C DCO application. The application includes a bypass of the A12 (including this AQMA) which should drastically improve NO_2 concentrations within the village including the AQMA. The DCO was consented by the Secretary of State on 20th July 2022 but has been subject to Judicial Review. The courts have since dismissed the legal challenge. The Final Investment Decision from the Government for Sizewell C is still awaited, however commencement of the development took place on 15th January 2024.

The early years works to build the associated developments, including the two villages bypass, will add traffic to the road network including through the AQMA. As part of discussions with SCC and ESC, SZC Ltd agreed to their construction fleet being made up of 92% Euro VI and expectations are that they will actually achieve a higher % as companies have prepared and are using new vehicles.

The two villages bypass build is estimated to take 18 months to two years from start of construction and is due for completion end of 2026. Traffic from the EA1N and EA2 DCO developments may also overlap with this period. The conclusions of the

cumulative Air Quality Assessments undertaken for the Sizewell C DCO application do not however predict exceedance of the annual mean NO_2 objective during the Early Years phase of the development.

The 2023 Early Years modelling is the only scenario which shows any negative impact within the AQMA. The 2023 modelling results for NO_2, PM_{10} and $PM_{2.5}$ are all classed as negligible and therefore not significant. Within the AQMA the NO_2 annual mean is predicted to increase by 0.7ug/m^3 (from 18.4 to 19.1ug/m^3) – though this is still well below the objective. Indeed, given the delay to the originally anticipated programme, it is likely that these negative impacts will be lessened as they will occur in later years.

All other future scenarios show a positive and beneficial impact within the AQMA once the two villages bypass is opened, with the peak year busiest day providing between a 7.4ug/m^3 and 6.7ug/m^3 reduction in annual mean NO_2 concentrations. The operational scenario for 2034 predicts a reduction between 6.9ug/m^3 6.5ug/m^3 in annual mean NO_2 concentrations.

Therefore, it has been demonstrated that despite some short term negative impacts on air quality within the AQMA which have been classed as insignificant, in the long term the construction of the two villages bypass will lead to a reduction in road traffic emissions and therefore concentrations of NO_2 within the AQMA. Revocation can therefore be supported with confidence.

ESC is also engaging with National Grid Electricity Transmission on the Sealink project[9] and have commented on air quality information within the Preliminary Environmental Information Report (PEIR). The PEIR confirms that air quality modelling will be required within the AQMA area at Stratford St. Andrew. Once results of air quality modelling are received by ESC they will be scrutinised further in subsequent LAQM reporting. ESC is aware that two further National Grid Venture projects are on the horizon, Nautilus and LionLink, for which there is limited detailed technical information at this time. Both projects will be reviewed in a similar fashion as required to ensure no significant impacts will be experienced in Stratford St Andrew.

[9] National Grid (2023) Preliminary Environmental Information Report, Available at: https://www.nationalgrid.com/electricity-transmission/document/151261/download

Summary, Conclusion and Recommendation

This assessment sets out the evidence relied upon by East Suffolk Council in seeking to revoke the Suffolk Coastal District Council AQMA Order No. 3.

Part IV of the Environment Act 1995 (as amended 2021) requires Local Authorities to review air quality in its area and assess whether AQS objectives will be achieved. Where it has been shown that the AQS objectives will not be achieved Local Authorities must declare an AQMA and put an AQAP in place to bring air quality within acceptable levels.

Where it can be subsequently demonstrated that AQS objectives are being and will continue to be met a Local Authority can revoke an AQMA by Order under the Environment Act 1995 (as amended 2021).

The Suffolk Coastal District Council AQMA Order No. 3 was designated in 2014 to address exceedances of traffic related NO_2 concentrations. Since 2014, monitoring has shown a continued reduction in pollutant concentrations, with recorded values having fallen below the AQS consistently for several years, since 2017.

National, regional and local policies have influenced the reduction in polluting emissions within the AQMA alongside ESC's AQAP, and it is reasonable to expect that further reductions will be achieved through the increasing use of ultra-low and zero emission vehicles in the coming years.

Although there are several large developments such as the SZC power station and EA1N and EA2 Offshore Windfarms expected to commence within the region, individual and cumulative assessments have determined they are not likely to have a significant effect on the air quality, despite their predicted short term increases in road traffic within Stratford St Andrew. Indeed, the two villages bypass that is part of the mitigation for SZC will be associated with significant beneficial impacts on NO_2 concentrations in the area that is currently the AQMA.

Having considered the historical monitoring data associated with The Suffolk Coastal District Council AQMA Order No. 3, national trends in emissions and any likely local impacts on the air quality within the AQMA, the Council is satisfied that the AQMA can be revoked. Whilst NO_2 concentrations within the AQMA have been consistently below the AQS objective for six years, it has also been demonstrated that this is likely to continue.

It is therefore recommended that the Suffolk Coastal District Council AQMA Order No. 3 be revoked at the earliest opportunity. A draft Revocation Order is presented in Appendix A: Draft AQMA Revocation Order. As per paragraph 4.12 of LAQM.PG(22), the Council's recently published Air Quality Strategy will effectively supersede local action planning work in the event of revocation, ensuring continued air quality improvements beyond statutory designations.

Appendix A: Draft AQMA Revocation Order

East Suffolk Council Order 2024

Environment Act 1995 Part IV Section 83(2)(b)

Order Revoking an Air Quality Management Area

East Suffolk Council, in exercise of the powers conferred on it by Section 83(2)(b) of the Environment Act 1995 hereby makes the following order:

1. This Order shall revoke the area known as the Suffolk Coastal District Council AQMA No 3 (as shown in the attached map) declared for the Nitrogen dioxide (NO_2) - Annual Mean on 18/06/2014.
2. This Order shall come into force on 1st January 2025.

The Common Seal of East Suffolk Council

Was hereunto affixed

In the presence of:

……..

Dated:

……..

Suffolk Coastal District Council

Suffolk Coastal District Council Air Quality Management Area Order No.3, 2014

Scale 1:1000

Map produced on 18 June 2014 at 15:26