
Local Authority:	Suffolk Coastal District Council
Reference:	AP1-302
Date of issue	February 2017

Action Plan Appraisal Report

This Appraisal Report covers the draft Air Quality Action Plan submitted by Suffolk Coastal District Council for the Stratford St Andrew AQMA. The Plan sets out information on air quality obtained by the Council as part of the Local Air Quality Management process required under the Environment Act 1995 and subsequent Regulations.

The Plan states that it will be reviewed annually, with progress reports also issued annually, both to the Council and to Defra through the ASR system.

The core actions suggested by the Council and set out in the report have considered local source apportionment and emissions reductions have been modelled. These are:

1. Re-locate the 30 mph speed limit sign to 200 metres outside of the village.
2. Review and consider planning applications on the basis of air quality impact
3. Longer term measures include the inclusion of speed activated signs, speed cameras and the possible construction of a bypass around St Andrew's village. In addition, reducing the emissions from the possible expansion of the Sizewell site is also considered.

The Council is advised to take consideration of the further commentary in the finalisation of its action plan.

Commentary

Summary: The draft plan is well presented and proportionate to the small area covered by the AQMA. Acknowledgement is given that the main measure may or may not achieve the required result and that further action may be required. It would have been useful to see the outputs from the drive cycle study that was conducted that is referred to in the Action Plan, to help the ascertain more information on the likely impact of the measure. In addition, including information on the non-air quality impacts of the measure would have been informative.

Supporting data: The draft plan summarises in a good succinct manner the nitrogen dioxide concentrations that have been recorded in Stratford St Andrew and the local issues.

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To support the development of measures, source apportionment has been presented. For traffic contributions, an estimate of the split between private hire and private vehicles would have been useful for diesel car emissions.

Level of ambition: The Council are limited in what they can realistically achieve given the location of the problem and therefore what has been suggested is a reasonable way forward at the current time. However, it is noted that the target pollution reduction in the AQMA is only $2\mu\text{g}/\text{m}^3$ and yet it appears that a higher reduction may be required for the annual mean nitrogen dioxide objective to be met, as in 2015 NO_2 concentrations of 43 and $44\mu\text{g}/\text{m}^3$ were recorded at the STA1 and STA8 sites respectively. Therefore, if the re-location of the 30mph speed limit sign does not have the desired effect, the Council are encouraged to take steps as soon as possible to implement further actions.

Analysis: As mentioned previously it would have been useful to see the outputs from the drive cycle study. In addition, it would have been useful to include some information on the non-air quality impacts of the measures. Cost information is provided and this is welcomed.

Monitoring progress: Key indicators are provided for each of the measures. However, these could be more robust as at present it states, "reduction in NO_2 concentrations". It would be good to see more of a firm indicator.

Additional impacts: No information is provided on the co-impacts of the measures presented, i.e. their impact on other environmental or social issues other than air quality. This could help make the case for the Core and supporting measures. These could be on a qualitative basis and demonstrate how the Plan contributes towards broader social and environmental goals for the local authority area.

This commentary is not designed to deal with every aspect of the Action Plan. It highlights a number of issues that should help the local authority in maintaining the objectives of its Action Plan, namely the improvement of air quality within the AQMA.

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 – or by emailing the form to reportappraisal@ttr-ltd.com.

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:

Thank you for your comments on our draft Action Plan for Stratford St. Andrew, we have liaised with the Consultants who undertook this piece of work on our behalf (TRL). We have provided a response to those comments of relevance together with additional information where needed, as follows;

Appraisal comment:

It would have been useful to see the outputs from the drive cycle study that was conducted that is referred to in the Action Plan, to help the ascertain more information on the likely impact of the measure.

SCDC response:

The outputs from the drive cycle study were presented in the Further Assessment undertaken for this AQMA. We will amend the text in the final Action Plan to reference the results summary and include the data within an appendix. This alteration will be made to the final Action Plan following the Public Consultation.

Appraisal comment:

For traffic contributions, an estimate of the split between private hire and private vehicles would have been useful for diesel car emissions.

SCDC response:

We do not have this data for this location.

Appraisal comment:

It is noted that the target pollution reduction in the AQMA is only 2µg/m³ and yet it appears that a higher reduction may be required for the annual mean nitrogen dioxide objective to be met, as in 2015 NO₂ concentrations of 43 and 44µg/m³ were recorded at the STA1 and STA8 sites respectively. Therefore, if the re-location of the 30mph speed limit sign does not have the desired effect, the Council are encouraged to take steps as soon as possible to implement further actions.

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SCDC response:

The latest monitoring data (2016 recently bias corrected) highlights that the current margin of exceedance has reduced again to $2\mu\text{g}/\text{m}^3$ at STA8 in the AQMA. This reduction supports the adoption of the main Action Plan measure of relocating the speed limit sign, which together with future emissions reductions from the introduction of newer cleaner vehicles, should result in the early achievement of the air quality objectives in the AQMA.

Appraisal comment:

Key indicators are provided for each of the measures. However, these could be more robust as at present it states, "reduction in NO_2 concentrations". It would be good to see more of a firm indicator.

SCDC Response:

We collected speed data within the AQMA as part of the Further Assessment and will repeat this process post implementation of measures 1, 3, 4, 5, and 6 in order that 'reduction in vehicle speeds' can also be added as another key performance indicator for these Action Plan measures. A second key performance indicator for Measure 7 (possible bypass) will also be added – 'reduction in traffic flows within the AQMA'. These alterations will be made to the final Action Plan following the Public Consultation.