Local Authority:	Bracknell Forest Borough Council
Reference:	ASR21-1112
Date of issue	January 2021

Annual Status Report Appraisal 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.

There are two Air Quality Management Areas (AQMAs) declared across Bracknell Forest Borough Council: AQMA "Area 1: The Bagshot Road (A322) Horse and Groom Roundabout Downshire Way AQMA" (Bracknell AQMA) and AQMA "Area 2: The Bracknell Road (B3348) and Crowthorne High Street, Crowthorne AQMA".

The Council undertook automatic monitoring of NO₂ at one location during 2020, Downshire Way (in Bracknell AQMA). The annualised annual mean was 26.9 μg/m³. Based on the evidence provided, there were no 1-hour mean concentrations monitored greater than the Air Quality Objective (AQO) limit of 200 μg/m³ during the time the automatic monitoring station was in use as data capture was affected by to the Downshire Way road works. However, the data provided has been queried as this appears to have been replicated from the template example. Passive monitoring of NO₂ took place via diffusion tube monitoring at 28 locations. During 2020, there weren't any exceedances across the passive monitoring network.

The Council also measures PM_{10} at one location in the Bracknell AQMA. The annual mean concentration was 18.35 $\mu g/m^3$ and there weren't any occasions where the 24-hour mean objective limit was exceeded during the time the automatic monitoring station was in use.

The Council has robust QA/QC procedures, which were applied appropriately and accurately to the 2020 monitoring data, outlining the information clearly with respect to the laboratory used for analysis of the diffusion tubes. The national bias adjustment factor has been determined and applied as, due to roadworks in Bracknell town centre near the automatic monitoring site, local data was limited, i.e. less than required 90%. Therefore, for the purposes of the ASR 2020, the national bias adjustment factor of 0.81 was used. Annualisation of the automatic monitoring site was carried in accordance with LAQM.TG16 and no distance-correction was needed because low concentrations were measured at all sites not at relevant exposure. All calculations were clearly outlined and justified.

In the report, the Council has detailed measures and plans to continue to address air quality within its administrative boundaries. The main focus is stated to be within AQMA areas. The Council notes that they have achieved most of the AQAP measures already and will be

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concentrating gathering data to either revoke the AQMA's, or if not to look at producing a new AQAP. The council has been awarded a DEFRA AQ grant which will be used for behaviour change project on Anti-Idling. It will also be monitoring the PM_{2.5} at those schools which are located near to the AQMA, and an action plan will be produced for each one, if needed on how to reduce the PM_{2.5} so that it is within the required limits.

The impacts, opportunities and challenges brought by Covid-19 have been identified and well detailed. High impacts were identified using the matrix, both on the implementation of the AQAP and the potential revocation of any AQMA. Indeed, it has been noted that a full pandemic free year will be needed to see what impact the alternations to the Downshire Way have made and if any AQMA can be revoked.

On the basis of the evidence provided by the local authority the conclusions reached are considered likely to be acceptable for all sources and pollutants, however amendments need to be made before this report can be accepted, as per the following comments. Following the completion of this report when these comments have been addressed, Bracknell Forest Borough Council should submit an Annual Status Report in 2022.

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Commentary

The following comments must be addressed in order for the report to be accepted:

- 1. The values in tables A.5 and A.7 (Short-Term NO₂ and PM₁₀) for 2020 are wrong. As the Automatic Station couldn't measure for three months, the council was required to calculate percentiles to assess potential short-term exceedances. However, the values in both tables are the same as the 2019 value for short-term NO₂. Both the NO₂ and PM₁₀ percentiles need to be calculated and included in the report.
- 2. The Adjustment Factor displayed in table C.1 is wrong, however the one mentioned in the text and applied is right. Please can the table be updated for avoidance of doubt.

The majority of the rest of the report is well structured, detailed, and provides the information specified in the Guidance. The following comments are designed to help inform future reports.

- Robust and accurate QA/QC procedures were applied for the diffusion tubes.
 The wrong diffusion tube tool was uploaded, but this was not a requirement.
- 2. Annualisation for the automatic site on Bracknell Downshire Way (NO2 and PM10) was carried out in line with TG(16) guidance for the annual means.
- 3. The Council has included discussion and presented the NO₂ trends observed in both of the AQMAs located within the Council's boundaries.
- 4. The local monitoring strategy has been updated during the present year and justifications have been given. The movement of monitoring locations is welcomed, allowing the Council to prioritise other areas of higher air pollution or closer to new developments as concentrations surrounding the AQMA have been below the Air Quality Objective. This demonstrates the Councils proactive and dedicated approach to improving air quality across Bracknell.
- Most tables were filled correctly but a few details could be improved: Table 2.1
 doesn't state the date of AQAP Publication. In Table 2.2, a couple of measures
 are missing the "Measure Status" and all are missing the "Estimated Cost of
 Measure".
- 6. The labels and location of some diffusion tubes within one or the other AQMA on the maps don't match the data in table A.2. Please can this be updated in next year's report for avoidance of doubt.
- 7. The comments from last year's ASR have been addressed.
- 8. The Council has multiple measures in place that will help to tackle PM_{2.5}. However, measures focus only on emissions from transport. Actions would also

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be possible on domestic emissions (through awareness campaigns for example). The Public Health Outcomes Frameworks were referred to, and this is encouraged to continue.

9. The report is a good source for members of the Public to find out about air quality in their area. The Council should continue their hard work.

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 Government, Scottish Government or DOE.

For any other queries please contact the Local Air Quality Management Helpdesk:

Telephone: 0800 0327 953

Email: LAQMHelpdesk@bureauveritas.com

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Appraisal Response

This Appraisal Response constitutes the re-appraisal of Bracknell Forest Council's 2021 ASR, which was re-submitted following the issues identified above.

The following comments required addressing to enable the report to be accepted:

- 1. The values in tables A.5 and A.7 (Short-Term NO₂ and PM₁₀) for 2020 are wrong. As the Automatic Station couldn't measure for three months, the council was required to calculate percentiles to assess potential short-term exceedances. However, the values in both tables are the same as the 2019 value for short-term NO₂. Both the NO₂ and PM₁₀ percentiles need to be calculated and included in the report.
- 2. The Adjustment Factor displayed in table C.1 is wrong, however the one mentioned in the text and applied is right. Please can the table be updated for avoidance of doubt.

Both comments have been addressed, and Tables A.5, A.7 and B.1 now contain the correct data.

The report can therefore now be accepted. The Council should proceed to submit their ASR in 2022.