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Local Authority:	<b>West Berkshire Council</b>
Reference:	<b>ASR22-1342</b>
Date of issue	<b>August 2022</b>

## **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.

West Berkshire Council have declared two Air Quality Management Areas within their jurisdiction:

- Newbury AQMA: declared in 2009 for exceedance of the annual mean and 1-hour mean Air Quality Objectives (AQOs) for Nitrogen Dioxide (NO<sub>2</sub>); and
- Thatcham AQMA: declared in 2011 for exceedance of the annual mean AQO for NO<sub>2</sub>;

Revocation of an AQMA should be considered following three consecutive years of compliance with the relevant objectives, as evidenced through monitoring. Due to at least two years of continual monitored compliance with both NO<sub>2</sub> AQOs (excluding 2020 and 2021 data), the Council have set out that they will consider the total revocation of both of these AQMAs in next year's ASR, once further data is available to support the decision. This is supplemented by commentary around compliance data through 2020 and 2021 likely having been affected by COVID-19 restrictions.

West Berkshire Council undertook automatic (continuous) monitoring at one site during 2021 (CM1 Newbury). NO<sub>2</sub> was measured by the automatic monitoring site, with the 1-hour mean objective and the annual mean objective both meeting the national objectives during 2021.

The Council undertook passive diffusion tube monitoring of NO<sub>2</sub> at 38 monitoring locations, including two triplicate sites, one of which is co-located with the automatic monitor. No exceedances of the annual mean objective were recorded at any of these sites during 2021.

QA/QC procedures have been applied appropriately and accurately to the 2021 monitoring data. Both national and local bias adjustment factors have been considered, with justification provided around the choice to apply the local factor. Annualisation was required at two sites during 2021 and distance correction was not required at any location. All calculations were clearly outlined and justified.

In the report, the Council has detailed extensive measures and plans to continue to address air quality within its jurisdiction. Key completed measures in 2021 include: completion of further

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improvement works to the A339 Bear Lane Roundabout to improve traffic flow; continuing expansion of the car club; setting up further walking, running and cycling groups to encourage alternative travel; continuing improvement and expansion of cycle parking facilities in schools; and undertaking anti-idling campaigns.

Priorities for the upcoming year include: continuing various forms of public engagement such as introducing monitoring of PM<sub>2.5</sub> at schools in the vicinity of AQMAs and encouraging travel alternatives; continuing to work with various stakeholders such as Public Health England and with the Public Protection Partnership; and continuing the automatic and passive air quality monitoring programme.

On the basis of the evidence provided by the local authority the conclusions reached are **accepted** for all sources and pollutants. Following the completion of this report, West Berkshire Council should submit an Annual Status Report in 2023.

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## Commentary

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

1. The council have used the latest reporting template in production of their 2022 ASR.
2. A number of errors within the tables in the report are also noted. Table 2.1 references 'Newbury AQAP' for both the Newbury and Thatcham AQMAs and the year the AQAP was published has not been included. The same errors have been included in the excel data tables file version of Table 2.1, with the 'Level of Exceedance Current Year' column having also been completed incorrectly in this file. Table 2.1 also does not include a link to the relevant AQAP for each AQMA, a link is instead included to the local authority's webpage on the UK AIR website. A link to the relevant AQAP document itself or a note as to how members of public can access this should be provided in this table in future reports.
3. Table A.2 has not been completed correctly, with certain columns having been mixed up. The height of the '31 Chapel Street' site is missing in Table A.2. The 'valid data capture for monitoring period' is incorrect throughout Tables A.3, A.4, and A.5. There are also two tables labelled Table C.2.
4. Passive monitoring of nitrogen dioxide (NO<sub>2</sub>) using diffusion tubes was completed at 38 locations during 2021 (an increase of two since 2020). This includes two triplicate sites, one of which is co-located with the automatic monitor (CM1), which monitors NO<sub>2</sub>. Some diffusion tube sites appear to have been relocated since 2020 and two additional sites have been added. This is welcomed, however a discussion of the reasons for these changes has not been included and would be beneficial to include in future years.
5. It is apparent that two of the diffusion tube sites ('17 Chapel Street Thatcham 1' and '17 Chapel Street Thatcham 2') are duplicates with the same co-ordinates. If it is confirmed that these coordinates are correct for both sites, the data for these sites should be processed correctly, by deriving the average annual mean in line with the guidance in LAQM.TG(16), for presentation within next year's ASR.
6. Both the annual mean and 1-hour mean Air Quality Objectives for NO<sub>2</sub> were complied with at all monitoring locations within 2021.

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7. Comments from last year's ASR have been mentioned and addressed. This is welcomed and encouraged for future ASRs.
8. The report includes detailed discussion of the measures the council are taking to address PM<sub>2.5</sub>. The council set out that, within the next reporting year, they intend to establish the feasibility of monitoring PM<sub>2.5</sub> (particularly at schools within the vicinity of AQMAs) within their jurisdiction, which is commended. Links are provided and discussed regarding the Public Health Outcomes Framework and fraction of mortality attributable to PM<sub>2.5</sub> emissions, which is welcomed. Comparisons to the regional and national average would be beneficial to include in future reports.
9. Reference is also made to the PM<sub>2.5</sub> Defra Background Maps, which is welcomed, however these have been referenced incorrectly. The 2018 base year is the latest available (rather than 2017, as stated in the ASR) and these can be used to determine the maximum modelled background concentrations of PM<sub>2.5</sub> for the current year, which is not clear in the report. This should be amended in future ASRs.
10. Sufficient detail is included in the QA/QC procedures for both the automatic analyser and the NO<sub>2</sub> diffusion tubes. Calculations for local bias adjustment and annualisation are outlined in detail. Distance correction was not required. Data showing the choice of bias adjustment factors for previous years, and discussion around the choice to apply the local factor this year, has been included. Derivation of and a direct comparison against the national factor has not been demonstrated. It would be beneficial to include this in future reports. A figure showing the national bias adjustment factor determination would be welcomed.
11. The laboratory and analysis method for the 2021 diffusion tubes is not specified in the report and the council have not discussed whether the diffusion tubes were deployed in line with the Defra calendar dates during 2021. This information should be included within all future reports.
12. The Council have provided mapping of their automatic and diffusion tube monitoring network in relation to their AQMAs, however this is labelled with site IDs that do not correlate with those in the results tables. This should be amended in future reports.
13. The council have included detailed trend graphs, which is commendable. However, graphs appear to only be included for monitoring sites that are within the AQMAs. In future years, it is recommended that the Council also include another graph to present trends at the monitoring locations outside of the AQMAs.

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14. The Council has included a discussion and review of its AQMAs, which is well-informed due to its monitoring network. Total revocation of both AQMAs has been considered and a decision has been made to keep these in place for now. This is supplemented by commentary around compliance data through 2020 - 2021 likely having been affected by COVID-19 restrictions. This is accepted, and if further years of compliance with the relevant objectives are monitored, full revocation of both AQMAs should be considered.
15. The Council has taken forward a number of important measures during 2021 and the progress being made on other measures is detailed, which is commendable. However, some information for certain measures is missing within Table 2.2. This should be provided, where possible, in future reports.
16. The continual collaborative approach that West Berkshire Council is taking with the Public Protection Partnership is commended.
17. Table 2.1 does not state the year the most recent Air Quality Action Plan (AQAP) was published, nor is this discussed anywhere else in the report. It is noted that the latest AQAP for both AQMAs appears to have been published on the council's website in 2011. The Environment Act requires that a local authority must, for the purpose of achieving AQOs in an AQMA designated by that authority, prepare an action plan in relation to that area. The Act also requires that Action Plans be periodically reviewed. While no time limit is explicitly set within the Act, ideally this is expected to occur no later than every five years. It is recommended that the Council follow this guidance.

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 Progress 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.**

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

Telephone: 0800 0327 953

Email: LAQMHelpdesk@uk.bureauveritas.com

## **Appraisal Response Comment Form**

Contact Name:	
Contact Telephone number:	
Contact email address:	UKLAQMAappraisals@aecom.com

### **Comments on appraisal/Further information:**

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