

Local Authority:	Exeter City Council
Reference:	ASR24-2181
Date of issue	July 2024

Annual Status Report Appraisal Report

The Annual Status Report (ASR) sets out new information on air quality obtained by Exeter City Council (ECC) as part of the Review & Assessment process required under the Environment Act 1995 (as amended by the Environment Act 2021) and subsequent Regulations.

ECC currently has one Air Quality Management Area (AQMA). 'Exeter AQMA 1' was first declared in March 2005 for exceedances of the NO₂ annual mean Air Quality Objective (AQO). The AQMA was amended in May 2011 to include exceedances of the NO₂ 1-hour mean AQO. ECC is proposing to amend the boundaries of the AQMA so that the area of the AQMA is reduced to just an area of exceedance on East Wonford Hill (around the location of monitoring site DT57). We advise ECC to wait until compliance has been achieved in 2022, 2023 and 2024 in the areas where ECC are proposing to remove the AQMA, before proceeding with plans to amend the AQMA. The current Air Quality Action Plan (AQAP) is due to expire at the end of 2024, but ECC do plan on publishing a new AQAP which focuses on the amended AQMA.

ECC undertook automatic monitoring at two sites, and non-automatic NO₂ diffusion tube monitoring at eighty-four sites in 2023. No changes to the monitoring network were made by ECC in 2023. In 2023, one exceedance of the NO₂ annual mean AQO was recorded, at monitoring site DT57 (located inside the AQMA, on East Wonford Hill) which recorded a concentration of 40.5µg/m³ (representative exposure) which is an increase of 0.1µg/m³ over the concentration of 40.5µg/m³ recorded at the same monitoring site in 2022.

The highest NO₂ annual mean concentration recorded outside of a AQMA is at monitoring site DT39 (located on Union Road, in the Stoke Hill area) which recorded a concentration of 26.9µg/m³ which is a decrease of 0.9µg/m³ over the concentration of 27.8µg/m³ recorded at the same monitoring site in 2022. The general trend in NO₂ annual mean concentrations is mixed with some monitoring sites recording in increase in concentrations between 2022 and 2023, and others recorded a decrease in concentrations over the same time scale. The average change in NO₂ annual mean concentrations between 2022 and 2023 is an increase of 0.2µg/m³.

The largest increase in NO₂ annual mean concentrations was recorded at monitoring site DT52 (located on Fore Street, inside the AQMA) which recorded a concentration of 34.7µg/m³ (representative exposure) in 2023 which is an increase of 2.4µg/m³ over the concentration of 32.3µg/m³ recorded at the same monitoring site in 2022. The largest decrease in NO₂ annual mean concentrations was recorded at monitoring site DT12 (located on Magdalen Street, inside

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the AQMA) which recorded a concentration of 18.7µg/m³ (representative exposure) in 2023 which is a decrease of 4.2µg/m³ over the concentration of 22.9µg/m³ recorded at the same monitoring site in 2022. No other exceedances of any other relevant AQOs were recorded in 2023.

QA/QC procedures have been applied, with a national bias adjustment factor being used. ECC uses Gradko International for the supply and analysis of the NO₂ diffusion tubes, which are prepared with 20% Triethanolamine / De-ionised water. This factor was used as the data collection at monitoring site CM1 (which has a continuous analyser) was low so a local bias adjustment factor could not be calculated. No distance correction was required at any monitoring site in 2023. Annualisation was required at monitoring site CM1 (as a data capture rate of below 75% was recorded). After annualisation, the PM₁₀, PM_{2.5}, NO₂, and O₃ annual mean concentrations remained below the relevant AQOs.

The ASR discusses what measures within the AQAP were completed or progressed within the reporting year of 2023 which range from the installation of the large solar array (with battery storage) at Water Lane (which is intended to power the first three of an intended fleet of electric refuse collection vehicles) to the delivery of a new city centre bus station (to provide improved facilities to public transport users in the city). The ASR discusses what measures ECC expects to be completed or progressed over the course of the next reporting year which range from the delivery of a low traffic neighbourhood on Water Lane (through the redevelopment of brownfield land) to all new vehicles entering ECC's fleet being likely to be electric (unless there is no availability of vehicles meeting the specific operational requirements on the market).

On the basis of the evidence provided by the local authority the conclusions reached in the report are **accepted** for all sources and pollutants. Following the completion of this report, Exeter City Council should submit an Annual Status Report in 2025.

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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. There is good quality discussion on NO₂ annual mean results and trends. This is encouraged for future reports.
2. There are good quality figures showing monitoring site locations and AQMA boundary. This is encouraged for future reports.
3. There is a good quality review on the amendment of the AQMA.
4. The valid data capture for the monitoring period is missing from Tables A.3 - A.9. This should be corrected for future reports.
5. Some of labels on Figure D.1 showing the locations of the monitoring location could be made clearer so that it is easier for the reader to see and understand.
6. The title of some of the columns don't match between the excel template (both blank and filled in), and the same tables contained within the ASR report. This should be corrected for future reports.

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

The [Air Quality Hub](#) is now run by Defra, it is a free online information and knowledge sharing resource for local authority air quality professionals. Please consider onboarding on the Air Quality Hub to access a multitude of air quality resources and be kept up to date with local authority air quality activity and air quality news.

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Appraisal Response Comment Form

Contact Name:	Alex Bulleid, Mary Rive
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Contact email address:	UKLAQMAappraisals@aeecom.com

Comments on appraisal/Further information:

Please could you confirm that our understanding of your advice about reviewing the AQMA and revising the AQAP is correct?

In the appraisal of last year's report it said 'The revocation of an AQMA should be considered following three consecutive years of compliance with the relevant objective as evidenced through monitoring. Where there have been no exceedances for the past five years, local authorities must proceed with plans to revoke the AQMA. The LAQM Technical Guidance 2022 is clear in this respect:

"There should not be any declared AQMAs for which compliance with the relevant objective has been achieved for a consecutive five-year period." (Point 3.57, page 50).'

For this reason, we set out the timetable included in this year's ASR for review of the AQMA now and subsequent revision of the AQAP starting next year. (At all sites except DT57, East Wonford Hill there were no exceedances of the objective in 2020, 2021, 2022 or 2023).

However in the appraisal of this report you have said 'We advise ECC to wait until compliance has been achieved in 2022, 2023 and 2024 in the areas where ECC are proposing to remove the AQMA, before proceeding with plans to amend the AQMA. The current Air Quality Action Plan (AQAP) is due to expire at the end of 2024, but ECC do plan on publishing a new AQAP which focuses on the amended AQMA.' Is this because you consider 2021 to be unrepresentative as well as 2020? If so, this was not made clear in the appraisal of the last report. Delaying the AQAP revision for another year would mean that we have a longer period without a revised AQAP and a longer period for which the AQMA boundary is larger than it needs to be.

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Please confirm that this is what you recommend, and that the timetable in the executive summary and section 3.2.1 of the report should all be delayed for 12 months?

Please could you also explain why we should have filled in the valid data capture for the monitoring period? Our understanding was that this is:

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

Because all our monitoring is carried out for 12 months, we have not ever filled in this column and have never been asked to before.

I have checked all the column headings in the report and the spreadsheet and can find no inconsistencies. Please could you tell me where these are so that I can correct them?