Local Authority:	East Devon District Council
Reference:	ASR22-1258
Date of issue	July 2022

Annual Status Report Appraisal Report

The Annual Status Report sets out new information on air quality obtained by East Devon District Council (EDDC) as part of the Review & Assessment process required under the Environment Act 1995 (as amended by the Environment Act 2021) and subsequent Regulations. This Annual Status report covers the reporting years 2021 and 2022 for EDDC.

East Devon District Council (EDDC) no longer has an AQMA, having revoked its only AQMA (Honiton) in the district on 25th April 2018. EDDC therefore have no formal requirement to develop an air quality action plan (AQAP). However, the council have still made progress in implementing a number of measures to improve air quality in key areas.

In 2020 and 2021, the council monitored for NO2 via a network of 54 passive diffusion tube sites including 1 triplicate location. Two new sites N85 and N86 were installed at the start of 2020. During both 2020 and 2021 there were no exceedances of the annual mean air quality objective for NO2 at any of the passive monitoring locations within EDDC. Additionally, no monitoring results were within 10% of the Air Quality Objective $(36\mu g/m^3)$ and as such no fall of with distance calculations were required.

Monitoring data in 2020 did decrease at most monitoring locations within EDDC when compared to 2019 data. However, there were slight increases in annual mean NO2 concentrations in 2021 when compared to 2020, this is mainly due to vehicle traffic numbers increasing back to more representative values post COVID 19. On average there was a $4.5 \mu g/m^3$ decrease in annual mean NO2 when comparing 2019 to 2020 data. A $3.6 \mu g/m^3$ decrease between 2019 and 2021 and a small $0.9 \mu g/m^3$ increase when comparing 2020 to 2021 data. The highest NO2 annual mean concentration in 2020 and 2021 was recorded at N46 (Honiton (High Street) - Windmill Court, A35) with a concentration of $33.3 \mu g/m^3$ and $35.2 \mu g/m^3$ in 2020 and 2021 respectively which is still well below the annual mean AQS objective of $40 \mu g/m^3$. The downward trend in NO₂ concentrations confirms that the declaration of an AQMA is not required for EDDC at this present time.

EDDC also examined data from the Honiton AURN (Automatic Urban and Rural Network) continuous monitoring site as part of DEFRA's national monitoring network. The Honiton AURN continuous monitor measures NO₂ concentrations within the area. The site continued to monitor no exceedances for both the annual mean and hourly mean objective limits in 2020 and 2021,

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with the NO2 annual mean concentration continuing to report significantly below the AQO (2020 $-6.6 \mu g/m^3$ and $2021 -6.9 \mu g/m^3$).

In 2020 and 2021, the council have carried out PM2.5 monitoring in the district using 5 Zephyr® air quality sensors. These sensors are not MCERTS certified and are therefore not included in the LAQM monitoring. However, they do provide the council with an indication of PM2.5 concentrations within the district. All monitors reported no exceedances of the 25 μ g/m³ AQO for PM_{2.5}.

The council have provided an in-depth discussion of their approach to tackling PM_{2.5} emissions. It would be helpful if they could describe their measures such as subsidies for bus services and the provision of new cycle and walking routes in further detail to illustrate how each measure will help achieve their commitment of becoming carbon neutral.

QA/QC of monitoring data has been discussed, and the local bias adjustment factor was selected for 2020 and the national bias adjustment factor for 2021 with details of the methodology (i.e. bias adjustment spreadsheet) provided. The Council have also included a comparison between the local and national factors for 2020 and 2021. The justification for the selection of the adjustment factor in 2020 and 2021 is well supported. Annualisation was required at one monitoring location. The Council have provided good mapping of all monitoring locations within the district.

EDDC priorities to further improve air quality in the area for the coming year include:

- Progress the Devon Low-Carbon Energy & Transport Technology Innovator (DELETTI)
 programme, which aims to help reduce emissions with the installation of electric vehicle
 charging points for public use across Devon
- Ensure new developments meet the requirements of planning policies and guidance in relation to air quality
- Continue to review the current NO2 diffusion tube monitoring network, where necessary, in order to identify and mitigate any potential exceedances of the annual mean air quality objective at locations of relevant exposure.

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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, EDDC 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:

- The council is commended for their approach to further improving Air Quality in the absence of a formal AQAP. Continued engagement with local residents is highly encouraged. The council should try to identify additional means to address further air quality concerns.
- Trend graphs have been provided for all monitoring data including diffusion tubes, which is commended.
- It is encouraging to see the council considered the comments made during the previous appraisal and actively made an effort to address all of these actions for this year's ASR.
- 4. The council is commended for their in-depth discussion of their approach to tackling PM_{2.5} emissions. It would be helpful if they could describe their measures in further detail to illustrate how each measure will help achieve their commitment of becoming carbon neutral.
- 5. As stressed in previous appraisals, the council is recommended to continue to review their current monitoring regime, specifically the addition of several new non-automatic monitoring sites (diffusion tubes) across the region. This is important as additional sites will help to identify whether there are other key areas of relevant exposure where there may be exceedances and the appropriate measures can be adopted accordingly.

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 Comment Form

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

Comments on appraisal/Further information: