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Local Authority:	<b>Derbyshire Dales District Council</b>
Reference:	<b>AQAP22-1412</b>
Date of issue	<b>August 2022</b>

## **Air Quality Action Plan Appraisal**

The Action 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 (as amended by the Environment Act 2021) and subsequent Regulations.

This Appraisal Report covers the draft Air Quality Action Plan (AQAP) for 2022 – 2026 submitted by Derbyshire Dales District Council (DDDC), in relation to the one remaining Air Quality Management Area (AQMA) in Ashbourne, which was declared for exceedances of the annual mean NO<sub>2</sub> Objective.

Very little reference is made to previous reporting, but given the AQMA was only declared in 2021, it is assumed this is the first AQAP for this AQMA. The AQAP uses the Defra report template and follows the general structure of the template well, and is concise and clearly formatted, with some exceptions. Sections which are expected to be completed on the finalisation of the AQAP are still highlighted with the red text from the template. The AQAP has been prepared with the support and agreement of a number of Local Authority offices and departments.

The Council discusses air quality in the AQMA to a limited extent. Over the last two years the annual mean NO<sub>2</sub> has not exceeded the Objective. However, it is considered that this is likely to be a result of the COVID-19 pandemic, and results have remained close to the Objective limit. The AQMA has therefore not yet been revoked.

The AQAP does also set out the public health context in limited detail, using the standard text from the report template.

Local scale policy documents are referenced in the Plan, with national scale documents not included. An East Midlands guide for developers to mitigate impacts on air quality has been produced for use across the East Midlands. In addition, the Derbyshire Air Quality Working Group are also developing an overarching Air Quality Strategy as a joint initiative between the Borough and District Councils and the County Council Public Health Team. Other departments, including Highways, Planning and Sustainable Transport Teams and independent body Sustrans are all also involved in the development of this strategy.

Source apportionment was carried out for the AQMA for 2019 (as indicative of pre-pandemic conditions) for both weekday and seven day average traffic scenarios. According to the

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calculations, in both scenarios, HGVs provide the largest contributions to NO<sub>2</sub>, with cars the second highest contributors, followed by LGVs. Buses are relatively low contributors. The only notable difference between a weekday and a seven day average is a slightly higher contribution for HGVs in the week, possibly reflecting delivery patterns during the working week.

The required reduction in road NO<sub>x</sub> concentrations to achieve compliance has been calculated at 20% in 2019, though very little detail supporting this calculation is provided.

Details of the steering group responsible for the AQAP's development have been provided, including the make-up of the group, though again detail is somewhat limited.

The measures in the AQAP have been developed under seven broad topics, namely:

- Alternatives to private vehicle use;
- Policy guidance and development control;
- Promoting low emission transport;
- Promoting travel alternatives;
- Public information;
- Transport planning and infrastructure; and
- Traffic management.

On an individual measure basis, of the 11 measures that have been taken forward in the Plan, these are generally focused on transport, with traffic management and low emission vehicles prioritised, as well as encouraging sustainable modes. Transport related measures include electric vehicle incentives, travel planning, active travel promotion, and the development of proposals for the Ashbourne Relief Road. Bus services are also targeted, though these are shown to be relatively low contributors.

Further measures focus on public realm improvements and vegetation / green screening. Opportunities for green infrastructure could be included within this scope. The projects could also be delivered in conjunction with making the Compton/ Dig Street one-way system permanent to further improve the pedestrian environment.

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The target reductions of pollution within the AQMA for all measures are not specified. It is therefore not clear which of the measures are intended to contribute the most to bringing about the reductions required to achieve compliance estimated. The measures presented are however considered likely to be effective in reducing emissions, and it is recognised that since 2019 concentrations have reduced, so less drastic actions may be required to achieve compliance now, then would have been the case in 2019.

Overall, whilst air quality improvements have been observed in recent years, this AQAP appears very much in the early stages of development. The report is therefore not accepted. The recommended improvements should be made, and particularly the content supporting the measures should be strengthened. Specific commentary to inform the required improvements to the AQAP and future updates is provided overleaf.

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The Council should take on board the following considerations to improve the draft, prior to finalising and publishing the AQAP, and in any future updates. Comments in **bold** are considered essential for acceptance of the Draft.

## Commentary

- The AQAP would benefit from providing more information on the extent and monitored concentrations of the AQMA to place more context on the AQAP.
- Whilst it is recognised the AQAP is still in draft format, there are still a number of sections to be populated, and red text from the template should be removed in the final version.
- The policy section of the AQAP could be more thorough, including reference to national policy such as the Clean Air Strategy. Some form of assessment of the likely impacts of the Local Plan for development would also be beneficial, to ensure that where compliance is achieved, this will be maintained. Integration with the Local Transport Plan would also be a good inclusion.
- **Whilst it has been stated that the required reduction in road NO<sub>x</sub> emissions calculated, there is no evidence of the supporting calculations to determine whether this is robust, which should be included. The calculation does demonstrate though that large reductions are needed to achieve compliance. This should also therefore be more explicitly referenced in the measures table, detailing how each measure contributes toward that overall reduction.**
- Dispersion modelling does not appear to have been produced in the development of the AQAP, which would aid the quantification of the measures.
- The AQAP determines qualitatively that the actions are likely to be effective, but doesn't accurately quantify any of the specific measures' impacts, which would help the reader to understand the relative merits of particular interventions. As per paragraph 2.85 of LAQM.TG(22), an AQAP should contain quantification of the emission impacts of proposed measures as a minimum. This could be aided by dispersion modelling to consider the reduction in NO<sub>2</sub> concentrations.

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- **It is assumed that the measures table will be developed significantly in the Final AQAP, both in the content of the existing measures, and potentially strengthened / an increased number of measures, depending on the quantification of their impacts. The necessary detail is severely lacking for a completed AQAP.**
- **The traffic data and calculations supporting the NO<sub>2</sub> µg/m<sup>3</sup> source apportionment calculations must be included, as it is currently unclear whether this has been robustly calculated.**
- **The source apportionment calculations do not add to 100% for either scenario, which should be rectified.**
- Development of the measures could give more weight to the source apportionment results, since these calculations are intended to drive the significant sources that should be targeted through action, in order to achieve the greatest improvements. Currently there is very little linkage between the two. For example, HGVs are listed as the highest contributors, but only one of measures focusses on HGVs in any way.
- **The measures would also benefit from a detailed cost/benefit analysis, as it is currently unclear to the lay person which of the measures will be most cost effective, and which will achieve the greater pollutant reductions.**
- Funding streams are also only briefly mentioned. Whilst it appears funding for some measures have been secured, which is encouraging, detailed consideration should be given to the sources of funding for each of the measures.
- The environmental externalities of the measures, such as the impact on climate change, are also not discussed in detail and could be considered where possible.
- Whilst it is recognised the consultation has not yet been undertaken, in the Final AQAP Appendix A should be populated with the specific responses to consultation and where and how these have been addressed within the document. The additional feedback already received on the AQAP / measures is however welcomed.
- Appendix B has been well populated, highlighting measures not taken forward to the Final AQAP, and the reasons behind these decisions. It would be informative to

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understand the evidence on which the reasons presented for not pursuing particular measures are based, with some additional references.

- More information could be provided around the Steering Group and the governance of the AQAP through implementation. Details of future meetings and recorded actions might be included, for example. The Steering Group must also play a crucial role through implementation, which should be acknowledged.

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 Government, Scottish Government or DOE, as appropriate**

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

Telephone: 0800 0327 953

Email: [LAQMHelpdesk@bureauveritas.com](mailto: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:**