

Local Authority:	<b>Runnymede Borough Council</b>
Reference:	<b>AQAP24-2054</b>
Date of issue	<b>February 2024</b>

## **Air Quality Action Plan Appraisal**

The Action Plan should set 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 2024 - 2029 submitted by Runnymede Borough Council (RBC). Air Quality Management Areas (AQMA) have been declared at two locations in Runnymede for exceedances of the annual mean nitrogen dioxide objective; land adjacent to the M25 (M25 AQMA) and at a traffic light-controlled junction in Addlestone town centre (Addlestone AQMA).

This action plan replaces the previous action plan which ran from 2014-2023. Actions delivered as part of the previous plan included active involvement in the Surrey Air Alliance, working on improving active travel infrastructure and ensuring all permitted processes operated within control limits.

No exceedances of the annual mean NO<sub>2</sub> objective occurred in the borough in 2022, and therefore no further reductions are currently required in order to meet the objective. In the M25 AQMA the last year an exceedance was measured in the AQMA was in 2019, while the Addlestone AQMA met the objective for the first time in 2022. If the 2023 monitoring data for the M25 AQMA continues to be well below the objective the Council will consider revoking this AQMA in 2024. Similarly, if the NO<sub>2</sub> concentrations in the Addlestone AQMA remain below the objective in 2023 and 2024, the Council will consider revoking this AQMA in 2025.

The main source of air pollution within the AQMA is considered to be road traffic, in particular from motorways such as the M25 and M3. A source apportionment exercise undertaken for the AQMA highlighted that cars and LGVs were the dominant road traffic contributors to NO<sub>2</sub> concentrations. A source apportionment exercise was also undertaken for Bridge Street/Weir Road junction, Chertsey, in which cars were found to be the dominant road traffic contributor to NO<sub>2</sub> concentrations.

As part of the action plan, actions have been developed under the following broad topics:

- Alternatives to private vehicle use;
- Environmental permits;

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- Policy guidance and development control;
- Promoting low emission transport;
- Promoting travel alternatives;
- Public information; and
- Transport planning and infrastructure.

Alongside the aim of continued compliance with the objectives within the AQMAs, key priorities in the AQAP include the following areas prioritised for action:

- Public information;
- Policy guidance;
- Improved infrastructure for active travel;
- Low emission transport; and
- Preparing an Air Quality Strategy for Runnymede.

A steering group has been established to help develop the AQAP. Consultation is scheduled to take place before the AQAP is finalised.

Actions include improving public information on the health effects of air pollution, implementing the green and blue infrastructure SPD, promoting cycling and walking and promoting low emission transport.

The AQAP utilises the Defra AQAP report template as a basis for the report and is generally well presented. Whilst only 12 measures are presented, these are considered commensurate with the concentrations monitored in the AQMAs, which are currently below the air quality objectives. The review and future revocation of AQMAs as appropriate is encouraged.

The Draft AQAP is accepted, on the basis that the following comments are incorporated into the Final AQAP, and future iterations.

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## Commentary

- It is noted that the intention is to revoke both AQMAs within the next 2-3 years. Should this be the case, RBC may choose to not update its AQAP and instead create an air quality strategy (noted as measure R7 in Table 5.1).
- It is recommended that the 2023 Annual Status Report for Runnymede is published to support the references in the AQAP.
- The AQAP follows the Defra template, however there are some minor formatting and text issues in the document that RBC may wish to correct in the final version. The spelling of Runnymede varies in the document (e.g. on pages i and 2). The link for Figure 1 is broken in the table of contents and p7 of the document.
- As per section 2.22 of LAQM.TG(22), AQAPs should, where possible, include the population within the AQMA area. The Office for National Statistics provides population data which can be used for this purpose. The smallest available area is for 'Lower Super Output Areas' (LSOA).
- Further detail on the calculation of the source apportionment would be beneficial, for example, noting the sites and concentrations at the sites for which the source apportionment has been undertaken. As per Box 7.5 of LAQM.TG(22), the local and regional background component of the sources could be considered. This will allow for a clearer understanding of the make-up of total ambient concentrations, and the sources that the local authority may have direct control over.
- The intended meeting schedule of the Steering Group through the implementation phase of the AQAP should be added, to ensure that the Group continues to meet and that measures are implemented effectively.
- In Section 5 the expected benefit in terms of pollutant emission and/or concentration reduction for actions is limited, however justification has been provided based on the current compliance within the AQMAs and the nature of the soft measures proposed. Wherever possible, further quantification of measures impacts is encouraged.
- Consultation is noted to take place following the draft AQAP. It is therefore expected that Appendix A will be completed for the final AQAP. The table summarising

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responses should also include specific responses to the feedback received, which signpost within the document where the consultation comments have been enacted, or otherwise, with supporting justification.

- Appendix C is not used and can be removed from the document.

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

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## Notice for 2024

Through the Environment Act 2021 and updated Local Air Quality Management Statutory Policy Guidance 2022, the Local Air Quality Management (LAQM) framework has been considerably strengthened. This page highlights some of the changes for delivery to help you prioritise action for improved air quality:

### 1. Strengthened Criteria for Air Quality Action Plans (AQAPs)

Where a Local Authority is not meeting air quality objectives they must create an AQAP setting out their intentions to improve air quality in the area. Without current action plans in place, Local Authorities risk negatively impacting their communities by not proactively working to reduce air pollution in the area.

The requirements and guidance around AQAPs were recently strengthened under the Environment Act 2021 and revised LAQM Statutory policy guidance, which Local Authorities must have regard to. The key criteria for action plans are that they:

- set out the measures they will take to secure the achievement, and maintenance, of air quality standards and objectives
- specify a date by which each measure will be carried out
- are revised no later than every five years

### 2. New Escalation Process for Reporting

To ensure ASRs and AQAPs are delivered on time, Defra has introduced a new reminder and warning letter system for Local Authorities. This system was set out in the LAQM Statutory Policy Guidance 2022, published on 6 August 2022.

From 30 June 2023, Local Authorities with overdue ASRs and AQAPs will start to receive their first reminder letters. As set out in the Tables 1 and 2 below, if reporting requirements continue to be missed, the matter can be escalated to a Section 85 Secretary of State direction to the relevant Local Authority Chief Executive specifying action.

You are therefore advised to ensure all statutory reporting duties for LAQM are met on time. Please refer to the LAQM Statutory Policy Guidance 2022 for more information.

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**Table 1: Reminder and warning process for ASRs**

<b>Timescale</b>	<b>Enforcement</b>	<b>Recipient</b>
Six months before deadline - <b>January</b>	<b>Pre-reminder letter</b>	From the Air Quality and Industrial Emissions (AQIE) Deputy Director to all local authority Chief Executives and relevant director/s - environment & public health reminding them of LAQM statutory requirements.
Two months before deadline - <b>April</b>	<b>Final pre-reminder letter</b>	From Defra's LAQM team to all Air Quality officers reminding them of June deadline
One month overdue - <b>July</b>	<b>Reminder letter</b>	From Defra's LAQM team to Air Quality Officer at non-submitting local authorities
Three months overdue - <b>September</b>	<b>Warning Letter</b>	From the AQIE Deputy Director to relevant director/s - environment & public health
Four months overdue - <b>October</b>	<b>Final Warning letter</b>	From the AQIE Deputy Director to relevant director/s - environment & public health
Six months overdue – <b>December</b>	<b>Ministerial letter:</b> Section 85 direction	Local Authority Chief Executive

**Table 2 – Reminder and warning process for AQAPs - Due to be revised at least every five years**

<b>Timescale</b>	<b>Enforcement letter</b>	<b>Recipient</b>
<b>AQAP 2 months overdue</b> (e.g. 14 months post AQMA designation or 5 years & 2 months since previous AQAP publication)	<b>Reminder letter</b>	From Defra's LAQM team to Air Quality Officer at non-compliant Local Authority
<b>AQAP 4 months overdue</b>	<b>Warning Letter</b>	From the AQIE Deputy Director to Environment Health / Air Quality Manager at non-compliant Local Authority
<b>AQAP 6 months overdue</b>	<b>Final Warning letter</b>	From the AQIE Deputy Director to relevant Director at non-compliant Local Authority
<b>AQAP 8 months overdue</b>	<b>Ministerial letter:</b> Section 85 direction	Local Authority Chief Executive

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### **3. Public Bodies Required to Contribute to Action Plans**

The Environment Act 2021 amended the Environment Act 1995 to increase the number of public bodies that have a duty to co-operate with Local Authorities for LAQM. Air quality partners are certain other public bodies that a Local Authority identifies as having responsibility for a source of emissions contributing to an exceedance of local air quality objectives. This could be a neighbouring authority, National Highways, or the Environment Agency. Once identified, there is a statutory requirement for such public bodies to engage and to contribute actions they will take to secure achievement of the local air quality objective and to maintain achievement thereafter.

All tiers of local Government are also now required by law to collaborate to address exceedances of Air Quality Objectives. County councils, the Mayor of London and combined authorities have similar duties to air quality partners. The difference is that, when requested, they must contribute to an action plan being prepared by a Local Authority, regardless of whether the local authority has identified them as being responsible for a source of emissions.

Under the new legislation, you may choose to request the support of another public body in the development of an AQAP and the same may be requested of your organisation.

Please refer to the LAQM Statutory Policy Guidance 2022 for more information. Should you require further assistance, please contact the LAQM Helpdesk:

Web: <http://laqm.defra.gov.uk/helpdesks.html>

FAQs: <http://laqm.defra.gov.uk/laqm-faqs/>

Tel: 0800 032 7953

Email: [laqmhlpdesk@uk.bureauveritas.com](mailto:laqmhlpdesk@uk.bureauveritas.com)

The Air Quality Hub also provides free online information and is a knowledge sharing resource for local authority air quality professionals:  
<https://www.airqualityhub.co.uk/>

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## **Appraisal Response Comment Form**

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

**Comments on appraisal/Further information:**