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Local Authority:	<b>Kings Lynn and West Norfolk Borough Council</b>
Reference:	<b>ASR20-0635</b>
Date of issue	<b>September 2020</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.

Kings Lynn and West Norfolk Borough Council have declared two Air Quality Management Areas (AQMAs) within their jurisdiction for exceedances of the annual mean air quality objective for NO<sub>2</sub>.

Automatic monitoring of NO<sub>2</sub> was undertaken at 2 roadside sites during 2019, of which one is located at a site considered to be representative of relevant exposure. The annual mean objective for NO<sub>2</sub> was not exceeded at either site, however site CM2 recorded an annual mean concentration of 37 µg/m<sup>3</sup>, which falls within 10% of the AQO. The application of distance correction would be appropriate for this site, however this has not been carried out. The Council also undertake monitoring of particulates; the 2019 PM<sub>10</sub> network comprised of one PM<sub>10</sub> TEOM monitor and four indicative Osiris dust monitors. PM<sub>10</sub> concentrations reported at these sites have remained below the annual mean and 24-hour mean AQS objective limits since 2015. PM<sub>2.5</sub> is monitored indirectly throughout the borough via the four Osiris dust monitors and is therefore indicative only. Annual mean PM<sub>2.5</sub> concentrations have been below the objective since monitoring began in 2016.

Non-automatic monitoring of NO<sub>2</sub> was undertaken via a network of 71 diffusion tubes across 69 monitoring sites, including a triplicate co-location study. One exceedance of the annual mean objective was recorded during 2019; a maximum concentration of 42.4 µg/m<sup>3</sup> was recorded at Site 2, which is located within the Town Centre AQMA. Data capture was good across the network, and did not fall below 75% at any site; annualisation was therefore not required.

QA/QC is considered to be thorough, with detailed supporting discussion provided for all procedures applied. Justification is provided for the absence of annualisation (due to good data capture) and distance correction (sites with recorded concentrations > 36 µg/m<sup>3</sup> are considered representative of relevant exposure). The Council have calculated a local bias adjustment factor, however have opted to apply the national factor as it is higher and therefore more conservative. Evidence for local factor calculation has been provided, which adheres to good practice.

Kings Lynn and West Norfolk Borough Council's AQAP was published in 2015, and is therefore approaching the 5-year mark, after which an update is advised. The Council have noted their

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intention to update their AQAP as a priority for the current reporting year following the completion of the Kings Lynn Transport Study, which is supported.

On the basis of the evidence provided by the local authority the conclusions reached are **accepted** for all sources and pollutants. The next step is for Kings Lynn and West Norfolk Borough Council to submit an Annual Status Report in 2021.

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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 provided a thorough report which contains the required content.
2. In Table 2.1, the maximum concentration at relevant exposure for the Town Centre AQMA should be Site 2 (42.4 µg/m<sup>3</sup>) as this is the highest monitored concentration within the AQMA, and the site itself is representative of relevant exposure. However, this has been presented as 21 µg/m<sup>3</sup> which is potentially misleading. Please update this prior to further publication of the report.
3. The inclusion of a table summarising the exceedances and near exceedances (Table 3.1) is a useful addition to the report, and the Council are encouraged to continue to include this in future report where applicable.
4. Monitoring location mapping is comprehensive and clearly demonstrates the extent of the monitoring network.
5. QA/QC is thorough and detailed supporting discussion is provided for all procedures applied. This adheres with good practice and is encouraged for all future reports.
6. Distance correction has not been carried out, however this is appropriate for sites CM2, 1, and 15. Per the requirements of TG16, distance correction is required where concentrations of > 36 µg/m<sup>3</sup> have been recorded at sites which are not considered representative of relevant exposure. Supporting discussion and example calculations should be provided in all future reports.
7. Should annualisation be required in future reports, full calculations and supporting evidence should be provided.
8. Clear priorities for 2020 were outlined, including completion of the Kings Lynn Transport Study and progression of an update to the Council's AQAP. These priorities are considered appropriate, and it is expected that a detailed update be provided in the Council's 2020 ASR.

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.**

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

Telephone: 0800 0327 953

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

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## **Appraisal Response Comment Form**

Contact Name:	
Contact Telephone number:	
Contact email address:	

**Comments on appraisal/Further information:**