Local Authority:	King's Lynn and West Norfolk Borough Council
Reference:	ASR22-1506
Date of issue	October 2022

## **Annual Status Report Appraisal Report**

The Annual Status Report sets out new information on air quality obtained by King's Lynn and West Norfolk Borough Council as part of the Review & Assessment process required under the Environment Act 1995 (as amended by the Environment Act 2021) and subsequent Regulations.

King's Lynn and West Norfolk Borough Council have declared two Air Quality Management Areas within their jurisdiction: Gaywood Clock AQMA and Railway Road AQMA. Both of these have been declared for exceedances of the annual mean air quality objective for NO<sub>2</sub>.

Automatic monitoring of  $NO_2$  was undertaken at 2 roadside sites during 2020. There were no exceedances of the annual mean objective for  $NO_2$  at either site in 2021, with no concentrations within 10% of said objective. The Council also undertake monitoring of particulates; the 2021  $PM_{10}$  network comprised of four indicative Osiris dust monitors. The Council state that the TEOM  $PM_{10}$  analyser from North Lynn is no longer operational.  $PM_{10}$  concentrations reported at three of these sites have remained below the annual mean and 24-hour mean air quality objective limits since 2015. However, there were 2 exceedances of the 24-hour mean air quality objective for  $PM_{10}$  at site OS2 in 2021. AQS  $PM_{2.5}$  is monitored indirectly throughout the borough via the four Osiris dust monitors and is therefore indicative only. Annual mean  $PM_{2.5}$  concentrations have been below the objective since 2017.

The Council undertook non-automatic monitoring of NO<sub>2</sub> at 75 monitoring sites in 2021 (77 tubes), including a triplicate co-location study at the CM1 (Southgates Park, King's Lynn) automatic monitoring site. There were no exceedances of the annual mean air quality objective for NO<sub>2</sub> at any non-automatic monitoring sites in 2021.

Trends associated with the annual mean concentrations of NO<sub>2</sub> in 2021 have shown a slight increase when compared to 2020, but remain below 10% of the air quality objective. The Council state that an additional monitoring site has been located along the Railway Road section of the A148, as monitoring data from 2021 has highlighted this as the area reporting the highest annual mean NO<sub>2</sub> concentrations.

The Council are closely monitoring the traffic levels following the recovery period from the COVID-19 pandemic.

The Council have robust QA/QC procedures in place, with detailed discussion provided for all procedures applied. The Council have calculated a local bias adjustment factor, however have

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opted to apply the national factor. The Council provide reasons for this, stating that the national bias adjustment factor was applied, due to the poor data capture associated with the co-located Southgates CM1 automatic monitor. as it is higher and therefore more conservative. Evidence for local factor calculation has been provided, which adheres to good practice. All non-automatic monitoring sites reported data capture of greater than 75% in 2021, meaning no annualisation was required. Automatic monitoring sites OS1 and OS4 reported data capture of less than 75%, meaning that annualisation was required. This was calculated using an average annualisation factor, calculated using background concentrations from the two closest AURN sites to the Borough Council of King's Lynn and West Norfolk.

The Council provide an extensive list of the measures they have in place/in progress to help reduce emissions of/exposure to PM<sub>2.5</sub> in their district. These include: monitoring of PM<sub>2.5</sub> levels using Osiris Dust Screening Units, reviewing options for reducing PM<sub>2.5</sub> options in the revised Air Quality Action Plan, agreeing to develop an Air Quality Strategy focussed on reducing PM<sub>2.5</sub> exposure, publishing advise on the Council's website about measures to reduce PM<sub>2.5</sub> (and other pollutants within the home, 8 Smoke Control Areas within King's Lynn, along with a number of other measures.

King's Lynn and West Norfolk Borough Council's AQAP was published in 2015, and is therefore past the 5-year mark and needs to be updated. The Council have noted their intention to update their AQAP following the completion of the King's Lynn Transport Study, which the Council state is now at Stage 3 of its implementation. The Council state that hey hope to complete a review and put forward the updated AQAP in the forthcoming year, for adoption during 2022/23.

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, Kings Lynn and West Norfolk Borough Council 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:

- 1. The Council have provided a thorough report which contains the required content.
- 2. As part of the report discussing PM<sub>2.5</sub>, the Council outline several measures which they have in place/in progress to help reduce PM<sub>2.5</sub> exposure. This is extremely encouraging to see and demonstrates the Council's pro-active and dedicated approach to tackling air quality within their jurisdiction. This is very much welcomed.
- QA/QC is thorough and detailed supporting discussion is provided for all procedures applied, including annualisation and bias adjustment. This adheres with good practice and is encouraged for all future reports.
- 4. There are numerous instances of typographical/grammatical errors within the report. It is encouraged that future reports are checked thoroughly for such errors, and that these are corrected prior to submission.
- 5. Monitoring data has been analysed and reviewed thoroughly. The Council have identified an additional monitoring location for 2022, on the Railway Road section of the A148. This was based on the fact that this area reported the highest annual mean NO<sub>2</sub> concentrations in 2021 and demonstrates the Council's committed approach to reviewing monitoring and thus tackling air quality within their jurisdiction. This is very much welcomed and encouraged.
- 6. Clear priorities are outlined in the report, including the implementation of the King's Lynn Transport Strategy and the current Air Quality Action Plan.
- 7. The Council has stated that they will complete a review and put forward an updated Air Quality Action Plan for adoption during 2022/23. The Council is strongly encouraged to progress with the publication of this updated AQAP.

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: