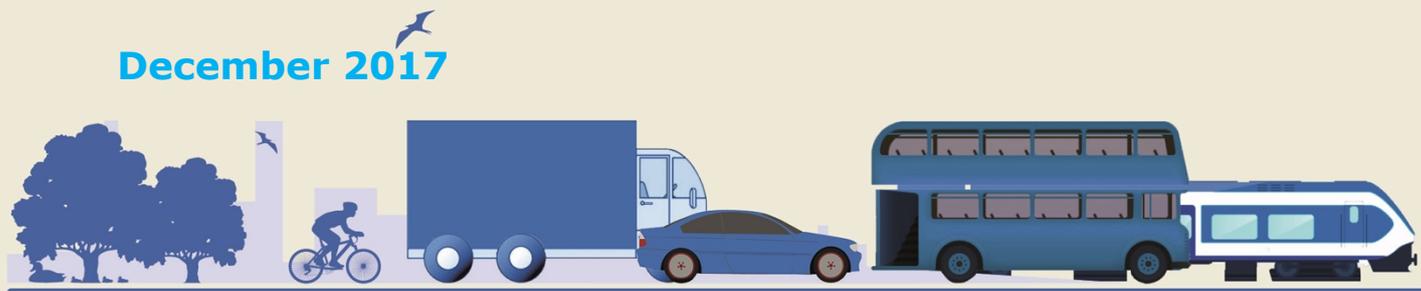


# Review of Air Quality Management Area

December 2017



## Appendix 2 Air Quality Management Area Options Appraisal

### The Current Air Quality Management Area

1. The current Air Quality Management Area (AQMA) covers the whole urban area as shown on the attached map. This was declared in 2008. The approach of declaring an urban wide AQMA has both advantages and disadvantages and was perhaps “of its time” when awareness of the issues surrounding air quality were less widely known and given less importance. In 2008, it was felt that the urban wide AQMA would raise awareness of air quality both within MBC and with external partners. It was also intended provide more influence over planning decisions and help to improve air quality in the District. The urban wide AQMA is very large, enclosing roughly 40 square kilometres.
2. Since the declaration of this AQMA, the council has 8 years of additional monitoring data, from a large number of locations across the borough. This data shows very clearly that the current AQMA includes many areas where air quality is not in exceedance of national guidelines and does not represent a risk to the public health. It is also acknowledged that there is a far greater acceptance and awareness of air quality issues within MBC and external partners. There is now recognition, that all have a role to play in helping to improve air quality. In that respect the current AQMA has achieved one of its goals.
3. However it should also be acknowledged that the council needs to focus efforts and target actions on the specific areas where air quality is a genuine problem and that having such a wide area has potential to dilute the focus of these actions. In addition it must be noted that in the actions proposed there are a number that while justifiable in an area where air quality is demonstrated to be poor they would be difficult to justify in areas where air quality has been demonstrated to be acceptable. An example of this is the proposal to implement a Low Emissions Zone restricting the type of vehicles that can access the proposed area.
4. It is considered good practice for Local Authorities to review AQMAs from time to time. It is also good practice for the AQMA to be reviewed when the action plan is significantly revised. It is required that the adopted action plan should be directly related to the AQMA. It is therefore appropriate to review Maidstone’s AQMA, taking account of the additional data available and the nature and ambition of the proposed action plan.
5. The Environmental Protection Team engaged the services of Air Quality Consultants Ltd, one of the longest established specialist Air Quality Consultancies in the UK who have provided assistance in dealing with Local Air Quality Management (LAQM) to more than 30 Local Authorities. Air Quality Consultants Ltd used the latest air quality data from our automatic monitoring stations and our network of diffusion tubes in order to model air quality throughout the District.
6. The results of this work clearly show the extent of the actual areas of poor air quality in the town centre and beyond. This is also shown on the attached map. As can be seen it forms a much more discrete area. The contours are labelled with the area in green showing the area where air quality is no longer likely to be in breach of the national objective.
7. From 1 April 2016 to 31 March 2107, there were 1301 planning applications originating from properties in the current AQMA. Over the same period there were 641 planning applications from properties within the boundaries of the proposed new AQMA. Each

of these applications is set to trigger a consultation to the E.P Team, as the application is in the AQMA it has been common practice to require an air quality assessment on these often very small applications. These assessments almost always result in a conclusion that air quality is acceptable and costs the applicant significant expense and time delay. It could be argued that do so is an unnecessary and unfair penalty on developers. It also has the effect that it diverts time of E.P Officers away from applications in areas of genuinely poor air quality where their time would be better spent.

8. The reduction in consultations would not result in a non-precautionary approach being taken to air quality and development as the Environmental Protection Team will continue to be consulted on any major developments that are not inside the AQMA due their potential impact on air quality. It would however enable officers to devote more time to those more important applications.
9. While it is proposed to change the size and shape of the AQMA to enable a greater focus on the areas of genuinely poor air quality this does not mean that the E.P Team will reduce the level of monitoring that is undertaken across the area. The current monitoring locations are shown on the map below. There are currently 57 locations that are monitored on a monthly basis. The monitoring at these locations will continue and if it is noted the air quality in a location that is currently acceptable has deteriorated the AQMA can be revised accordingly.

### **Proposed AQMA**

10. The data available to us now, compared to when the AQMA was originally declared, allows us to be more confident about exactly where the areas of poor air quality really are. Therefore we are now able to redraw the boundaries of the AQMA so that only those areas are included.
11. The results of the review are shown on the map attached. The map shows contours of different pollution levels represented in different colours. All the areas above  $40\mu\text{gm}^{-3}$  must be included in the AQMA, but it is recommended that the  $36\mu\text{gm}^{-3}$  contour is also included in the AQMA. This not only makes an allowance for any modelling errors, but means that the E.P Team be alerted to developments in areas already close to exceeding the air quality objective.
12. The Council is required under Schedule 11 of the Environment Act 1995, to consult on changes to the AQMA. Statutory consultees include the Secretary of State, the Environment Agency, the Highways Agency, the County Council and neighbouring District Councils. Non statutory consultees include local residents and businesses, Local Council Members and the local MP.

# Maidstone AQMA & Nox Tube Locations

