
Local Authority:	West Norfolk (The Borough Council of King's Lynn and West Norfolk)
Reference:	AP1-290
Date of issue	24/11/14

Action Plan Appraisal Report

This Appraisal Report covers the Air Quality Action Plan report submitted by King's Lynn & West Norfolk Borough Council. 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 and subsequent Regulations. It is a draft Action Plan, and pertains to the King's Lynn Town Centre and Gaywood AQMAs, declared due to exceedences of the NAQS annual mean objectives for nitrogen dioxide (NO₂)

The overall plan is clear, comprehensive and substantially follows the guidance outlined in LAQM PG(09). The plan provides a background to the review and assessment work undertaken by the Council. This includes the findings of the source apportionment exercise undertaken in the detailed and further assessment stages, and a statement on the required reductions in emissions and NO₂ concentrations for the two AQMA.

The Council has selected 20 measures to develop further under the AQAP, acknowledging that the council cannot implement all directly but can influence. The measures are organised under three themes:

- Policy actions (e.g. adopt Norfolk Technical Guidance on Air Quality; develop Parking Management Plan)
- Road traffic actions (e.g. New access road; Incentivise the use of public transport; Decriminalisation of parking; Variable car parking rates).
- Emissions actions (e.g. Investigate feasibility and if viable provide Electric vehicle charging points; develop Quality Bus Partnerships).

Measures have been recommended for investigation, development and implementation, some of which are already underway.

It is notable the Council has already adopted a variety of 'in house' actions that recognise the impact of the organisations activities and policy influence on emissions to air quality, such as: Adoption of a Green Travel Plan; Modification of the Borough Council's Car Lease Scheme; Recommendation of air quality improvement measures for inclusion within the Community Infrastructure Fund; Inclusion of air quality issues within the County Council Local Transport Plan.

The Council is advised to take consideration of the further commentary in the finalisation of its action plan.

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Commentary

1. The Council has adopted a strategic approach to the update of their action plan with links made to other council policy, which is welcomed.
2. Detailed source apportionment data have been included from the Further Assessment of the two AQMA. In the Kings Lynn AQMA a 20% reduction in traffic emissions of NO_x is necessary to achieve the annual mean air quality objective for NO₂. This is equivalent to a 24µg/m³ reduction in ambient concentrations of NO_x, and approximately equivalent to a 6µg/m³ (12%) reduction in NO₂. In the Gaywood AQMA evidence suggests that a 26% reduction in traffic emissions of NO_x is necessary to achieve the annual mean air quality objective for NO₂. This is equivalent to a 29.5µg/m³ reduction in ambient concentrations of NO_x, and approximately equivalent to an 8.2µg/m³ (17%) reduction in NO₂.
3. The source apportionment has enabled useful statements on the scale of emission reduction required at a variety of monitoring/receptor points, and the largest contributors to road NO_x are stated to be cars and bus. The data supplied suggests a relatively more equal contribution from all relevant vehicle types, including HGV and LGV. The measures targeting road traffic will however tend to influence all types of road transport sources.
4. It is noted that an experienced and relevantly attended Steering Group has been set up, following on the King's Lynn Area Transport Strategy Group (KLATS) and includes the Borough Council's Environmental Health and Housing, Planning and Regeneration Departments, Norfolk County Council's Planning and Transportation Department together with their consultants, a local bus operator and the Highways Agency. This approach is welcomed.
5. The Plan includes a thorough explanation of the process used for measure selection and prioritisation, which was applied to around 60 distinct potential actions. The Annex to the Plan contains a table of information outlining the estimated costs and benefits of each of the actions, based on professional judgement and available evidence. It is noted that:
 - a. The selection criteria and prioritisation method for selecting actions is comprehensively described. It is noted that a number of measures were

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considered and rejected from the plan, while others are suggested for inclusion in (future?) low emission strategy.

- b. All actions have benefitted from specific target dates for potential completion (e.g. implement during 2015) to assist in discussions with stakeholders, funders and ultimately to track and report on plan progress. A number of actions appear to have already reached implementation stage, and therefore a review and report on their progress on an annual basis will be welcomed.
 - c. It is noted that indicators have been set for all measures. Indicators enable a link to be made between actions, their targets and anticipated emission impacts. Indicators can also provide a proxy for emission reduction (and pollutant concentrations) that are challenging to monitor. The approach to indicator setting varies in the draft Plan: precise indicators are provided for traffic and emission actions, normally two for each action (e.g. Queue length at junctions at peak times) whereas a checklist approach is taken for policy actions (e.g. Publication of and implementation of plan). This is welcomed given the variability of direct air quality monitoring to detect impacts in the short term. Setting indicators is a process that might be fine-tuned or elaborated as each of the actions are developed as a useful way to monitor progress.
 - d. The selected 20 actions each have a "Target NO₂ reduction impact (µg/m³)" assigned with an indication of NO₂ changes. It would be relevant to understand if the analysis of actions can determine to what extent they will remove observed exceedences and by when.
6. The Plan contains a statement that there will be regular review and assessment of the Action Plan proposals to evaluate progress and this will be reported annually as part of the LAQM Action Plan Progress Report, which is welcomed.
 7. The Plan described a number of measures that are not part of the action plan, formally, but are based on the Council leading by example, such as forming a corporate/staff travel plan, and this is to be commended.
 8. The Council is undertaking a consultation exercise for the draft plan. The final Plan would benefit from confirmation of the consultees who have been approached (following the list of organisations named in section 5.3), and any

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revisions made based on from further discussion, consideration and examination of proposed measures.

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 Assembly Government, Scottish Government or DOE, as appropriate – or by emailing the form to reportappraisal@ttr-ltd.com.

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

Telephone: 0800 0327 953

Email: 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: