# Babergh District Council

# Air Quality Action Plan for Cross Street, Sudbury

In fulfilment of Part IV of the Environment Act 1995

Local Air Quality Management

March 2024

| Information | Babergh District Council Details |
|---|---|
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# Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the action we will take to improve air quality in the Cross Street Air Quality Management Area (AQMA) in the Babergh district between 2023 and 2028.

This action plan replaces the previous iterations of the action plan which ran from 2011 to 2022. Projects delivered through the past action plan include:

- Removal of a build-out at the southern end of Cross Street that was leading to congestion and queuing as vehicles waited for on-coming traffic to pass.
- Removal of two sets of on-street parking bays, allowing traffic to flow freely in both lanes.
- Installation of electric vehicle charging points in public car parks in Sudbury.
- Education and engagement with local schools through anti-idling campaigns.

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often the less affluent areas[1,2].

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion[3]. Babergh District Council (BDC) is committed to

[1] Environmental equity, air quality, socioeconomic status and respiratory health, 2010

[2] Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

[3] Defra. Abatement cost guidance for valuing changes in air quality, May 2013

reducing the exposure of people in Cross Street to poor air quality in order to improve health.

We have developed actions that can be considered under five broad topics:

- Policy guidance and development control
- Promoting low emission transport
- Promoting travel alternatives
- Public information
- Traffic management

The projects delivered to-date have significantly improved air quality along Cross Street and monitoring data confirms that the national Air Quality Objectives (AQO) have not been exceeded since 2019. However, we need to be satisfied that the AQOs will continue to be met in the long-term and in this regard, we must discount monitoring data from 2020 and 2021 because of the impact of the Covid-19 pandemic on traffic flows. Our priorities are therefore to ensure the AQOs continue to be met within the Cross Street AQMA in the long-term by:

- Monitoring Nitrogen dioxide ($NO_2$) concentrations throughout the AQMA to inform an assessment of the ongoing impact of removing the on-street parking bays.
- Reviewing the current 'free' parking policy for short stay parking in Council car parks.
- Ensuring new developments contribute to air quality actions with measures to improve efficiency and minimise emissions as much as possible.

In this AQAP we outline how we plan to effectively tackle air quality issues within our control. However, we recognise that there are a large number of air quality policy areas that are outside of our influence (such as vehicle emissions standards agreed in Europe), but for which we may have useful evidence, and so we will continue to work with regional and central government on policies and issues beyond Babergh District Council's direct influence.

## Responsibilities and Commitment

This AQAP was prepared by the Public Protection Department of Babergh District Council with the support and agreement of the following officers and departments:

- Development Management and Strategic Planning (BDC)
- Economic Development and Climate Change (BDC)
- Growth, Highways, and Infrastructure, Suffolk County Council (SCC)
- Public Health and Communities (SCC)

This AQAP has been signed off by BDC's Director of Operations and by SCC's Director of Public Health, following public consultation.

This AQAP will be subject to an annual review and appraisal of progress. Progress each year will be reported in the Annual Status Reports (ASRs) produced by Babergh District Council, as part of our statutory Local Air Quality Management duties.

If you have any comments on this AQAP please send them to Environmental Protection at: Babergh District Council, Endeavour House, 8 Russell Road, Ipswich, IP1 2BX. Email: environmental@baberghmidsuffolk.gov.uk.

# Table of Contents

## List of Tables



## List of Figures

# 1 Introduction

This report outlines the actions that Babergh District Council will deliver between 2023 and 2028 in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to Cross Street, Sudbury.

It has been developed in recognition of the legal requirement on the local authority to work towards Air Quality Strategy (AQS) objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the Local Air Quality Management statutory process.

This Plan will be reviewed every five years at the latest and progress on measures set out within this Plan will be reported on annually within Babergh District Council's ASR.

# 2 Summary of Current Air Quality in the Cross Street Air Management Area

Air Quality within the Babergh district is generally good and has been monitored and reported to Department for Environment, Food and Rural Affairs (Defra) in line with the Local Air Quality Management regime since 1997. An AQMA, covering part of Cross Street in Sudbury was designated in November 2008 because of measured exceedences of the annual mean Nitrogen dioxide ($NO_2$) AQO (concentrations above 40 µg/m$^3$). At the time of designation, concentrations in the AQMA ranged from 34 to 64 µg/m$^3$. The AQMA encompasses properties along Cross Street from the junction with Church Street to 5/89 Cross Street (Figure 2.1).


**Figure 2.1 – Cross Street, Sudbury Air Quality Management Area**

The Office for National Statistics provides population data for 'Lower Super Output Areas' (LSOA). The postcodes within the AQMA fall within the wider 'Babergh 007G' LSOA, which covers an area of 3.5 $km^2$, with an estimated population of 1,602[4]. However, the AQMA only encompasses approximately 60 properties so the actual population within its boundaries is significantly less than this at just over 100 people. There is, however, a primary school within 100m of the AQMA, and Cross Street is likely to be on route to school for a number of children living nearby.

The most recent, highest annual mean value (bias adjusted) for $NO_2$ in 2022 at monitoring locations within the AQMA was 32.8 microgrammes per cubic metre ($\mu g/m^3$) (at monitoring location BDC 8), which was below the AQO of 40.0$\mu g/m^3$. Although the current annual means are below the AQO, as detailed within Table 2.1 and Figure 2.2 below, the annual mean at three monitoring locations have previously been above the AQO in 2018 and 2019.

As shown in Table 2.1 and Figure 2.2, the $NO_2$ concentration has fallen over the past few years, although this will be partly attributable to the Covid-19 pandemic and associated restrictions on movement, as well as some improvements in engine management and emissions reduction technology.

[4] ONS. Lower layer Super Output Area population density, March 2024

**Table 2.2 – Summary of Annual Mean $NO_2$ Monitoring in Cross Street AQMA, 2018 – 2022, (µg/m$^3$)**

| Site No. | Location | 2018 | 2019 | 2020 | 2021 | 2022 |
|---|---|---|---|---|---|---|
| BDC 1 | 9 Cross Street, Sudbury | 31.0 | 28.1 | 24.8 | 25.8 | 25.5 |
| BDC 2 | 17 Cross Street, Sudbury | 30.3 | 28.7 | 27.1 | 27.9 | 29.4 |
| BDC 3 | 30 Cross Street, Sudbury | 37.7 | 34.8 | 28.7 | 30.0 | 31.7 |
| BDC 5 | 58 Cross Street, Sudbury | 38.1 | 36.0 | 30.4 | 32.3 | 31.9 |
| BDC 6 | 70 Cross Street, Sudbury | 34.0 | 31.2 | 23.2 | 24.9 | 24.6 |
| BDC 7 | 78 Cross Street, Sudbury | **51.4** | **47.5** | 31.1 | 33.3 | 31.8 |
| BDC 8 | 82 Cross Street, Sudbury | **49.7** | **47.3** | 32.8 | 33.2 | 32.8 |
| BDC 9 | 87 Cross Street, Sudbury | **46.3** | **47.0** | 31.5 | 31.5 | 30.6 |

Exceedances of the $NO_2$ annual mean objective of 40µg/m$^3$ are shown in **bold**.

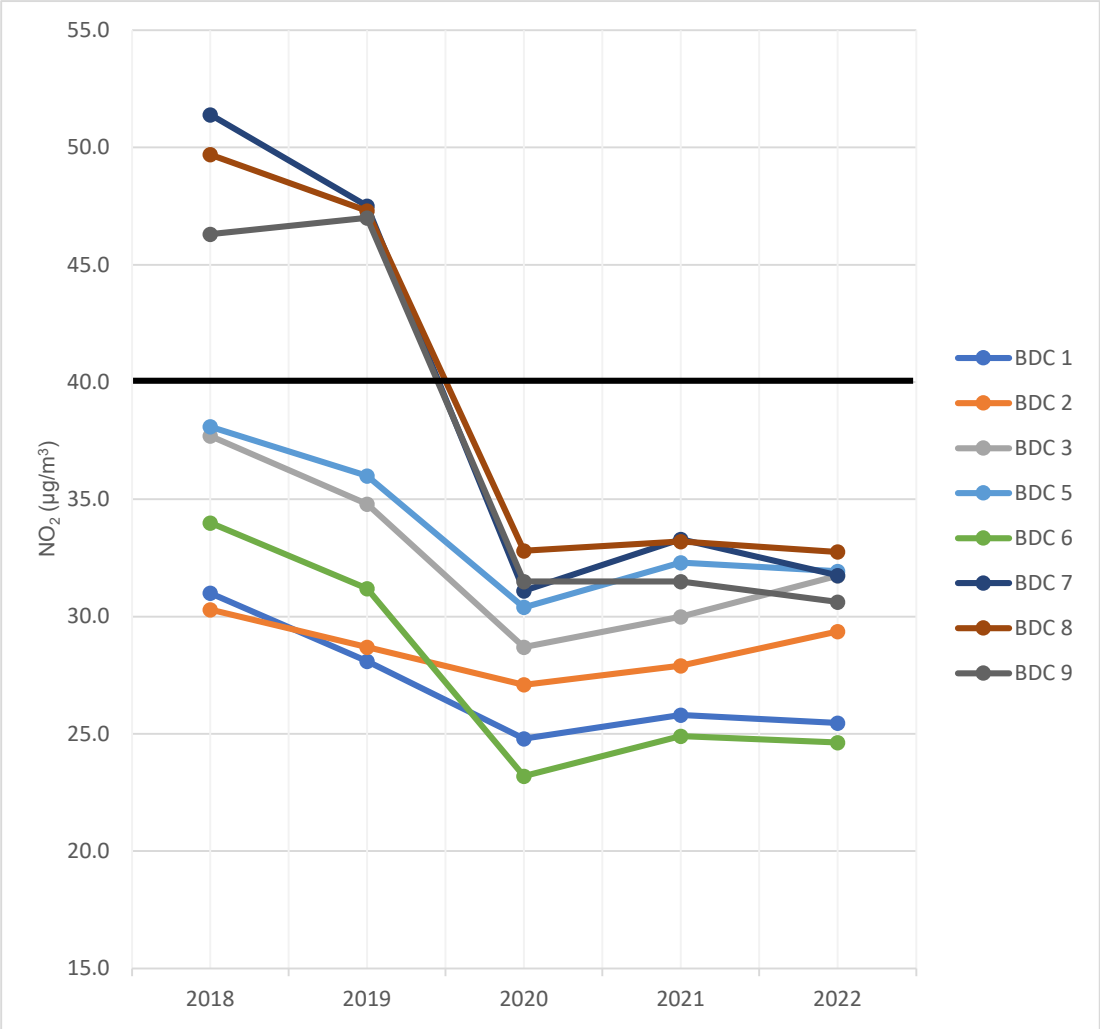


**Figure 2.2 – Trends in Annual Mean $NO_2$ Concentrations for Monitoring Locations within the AQMA (µg/m$^3$)**

All of the historic documents which support this plan, along with detailed source apportionment and modelling studies, can be found on the Council's Air Quality webpages.

# 3 Babergh District Council's Air Quality Priorities

## 3.1 Public Health Context

Air pollution is associated with several adverse health impacts. Some individuals such as those with pre-existing respiratory or cardiovascular disease are particularly susceptible, but the effects of air pollution can be seen across the population. The mortality burden of air pollution in England is estimated to be between 26,000 and 38,000 a year, but in addition many people suffer avoidable chronic ill health as a result of it[5].

There is growing evidence regarding the impact of gaseous pollutants on respiratory and cardiac health from sources such as the Committee on the Medical Effects of Air Pollutants (2018)[6] and the Royal College of Physicians and Royal College of Paediatrics and Child Health (2016)[7]. Research has linked air pollution with cancer and dementia, as well as the additional impact on mental health from the traffic noise affecting residents in homes in Air Quality Management Areas.

Figure 3.1 outlines the air pollutants, sources, and potential health impacts for Nitrogen oxides ($NO_x$).

[5] Chief Medical Officer's Annual Report, Air Pollution, 2022

[6] Committee on the Medical Effects of Air Pollutants, Associations of long-term average concentrations of Nitrogen dioxide with mortality, 2018

[7] Royal College of Physicians and Royal College of Paediatrics and Child Health, Every breath we take: the lifelong impact of air pollution, 2016

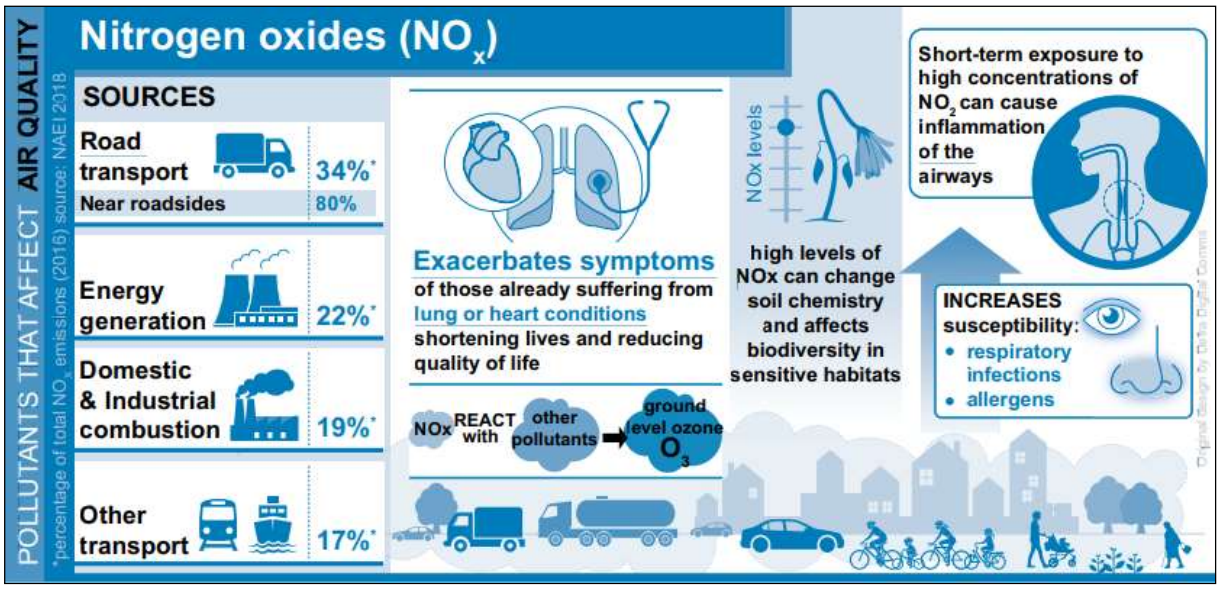


**Figure 3.1 – Air Pollutants, Sources, and Potential Health Impacts of NOx[8]**

Following a reform of public health services, local authorities now have a duty to carry out a public health function in relation to air quality. Local authorities therefore need to promote links with departments including public health, environmental protection, transport, planning, and sustainability to raise awareness of the effect of air pollution on public health and to encourage local action to be taken. Babergh District Council, as part of the Suffolk Air Quality Group, is working with the Public Health division within the County Council on ways to better integrate and promote Local Air Quality Management work across these disciplines as well as working with Suffolk County Council Travel Planners and district Planning Policy teams to ensure that air quality is appropriately considered and integrated into local travel plans and planning policy documents.

Babergh District Council's emerging vision and priorities for the next 4 years[9] focuses on sustainable communities and supporting community wellbeing and residents to become healthier. To meet this priority, the Council supports Suffolk's Joint Local

[8] Defra. Clean Air Strategy, 2019

[9] Babergh District Council, Our Plan for Babergh: A more resilient and sustainable future for Babergh (2023 – 2027)

Health and Wellbeing Strategy[10], which sets out priorities for improving health and wellbeing across the population in Suffolk, including environmental factors that impact people's health and wellbeing, such as air quality. In working towards improving air quality across the district to below the national AQOs, this AQAP upholds the Council priority in supporting communities to become healthier by reducing exposure to poor air quality.

The Department for Health's Public Health Outcomes Framework[11] includes an indicator related to air pollution on the "fraction of mortality attributable to particulate air pollution", broken down by local authority. In Babergh this fraction was reported as 5.1% which is slightly lower than the English average of 5.5%. Actions that are considered to reduce road traffic related emissions of $NO_2$ are also likely to address emissions of particulates thus contributing to an improvement in this indicator.

## 3.2 Planning and Policy Context

Land-use planning plays an important role in improving air quality, strategically by setting out the broad location for development and locally through individual planning applications. Air quality is a material planning consideration to be reflected in relevant planning decisions.

Part 1 of the Babergh and Mid Suffolk Joint Local Plan[12] was adopted in November 2023 and contains several references to air quality, the Cross Street AQMA and AQAP. Policy LP15 of the Local Plan also states: "*Development proposals must demonstrate appropriate consideration of the following:*

a. *Prevent, or where not practicable, mitigate and reduce to a minimum all forms of possible pollution including, but not limited to: air, land, ground and surface*

[10] Suffolk Health and Wellbeing Board. Preparing for the Future, Joint Local Health and Wellbeing Strategy, 2022 - 2027

[10] Office for Health Improvement & Disparities. Public Health Outcomes Framework, 2023

[11] Babergh and Mid Suffolk District Councils. Babergh and Mid Suffolk Joint Local Plan – Part 1, 2023

*water, waste, odour, noise, light and any other general amenity, including public amenity and visual amenity impacts. This must be convincingly demonstrated by impact assessments where appropriate.*

b. *Significant adverse amenity impacts are avoided where a proposal is located adjacent to or close to existing uses. This would include an assessment of any identified amenity impacts that have a significant adverse effect and how the continued operation of existing use(s) would not be prejudiced*".

The background and explanation to policy LP15 goes on to state: "*Applications within an Air Quality Management Area (AQMA) and major planning applications may be required to submit an air quality impact assessment to assess and quantify the impact on local air quality and to identify appropriate mitigation measures to ensure that development is acceptable on the grounds of air quality. Contributions may also be required towards the cost of air quality mitigation measures*".

## 3.3 Source Apportionment

The AQAP measures presented in this report are intended to be targeted towards the predominant sources of emissions within the Cross Street AQMA.

To develop appropriate measures to improve air quality along Cross Street and inform the updated Action Plan, it is useful to identify the sources contributing to roadside NOx concentrations within the area. The source apportionment within this section has been quantified in terms of the quantity of pollutants released into the atmosphere from each vehicle source.

A source apportionment exercise was carried out by Babergh District Council accounting for different proportions of emissions emitted by different vehicle types on Cross Street for 2022 using the Defra Emission Factor Toolkit, version 12.0.1[13], and traffic data from Suffolk County Council Highways Department for monitoring site

[12] Defra. Emissions Factors Toolkit, v12.0.1, 2023

9208. This identified that within the AQMA, the percentage source contributions were as shown in Table 3.1.

**Table 3.2 – Source Apportionment by Vehicle**

| | Cars | Motorbikes | Buses and Coaches | Light Goods Vehicles | Heavy Goods Vehicles |
|---|---|---|---|---|---|
| Volume of traffic (%) | 76.9 | 0.9 | 0.1 | 19.0 | 3.1 |
| Roadside NOx contribution (%) | 54.3 | 0.1 | 0.6 | 34.9 | 10.1 |

Figure 3.2 shows the percentage contributions of each vehicle type to total predicted NOx emissions from the road. The largest proportion is contributed by cars, followed by Light Goods Vehicles and Heavy Goods Vehicles. This highlights the importance of keeping all sources under consideration when contemplating measures to include within this Action Plan.

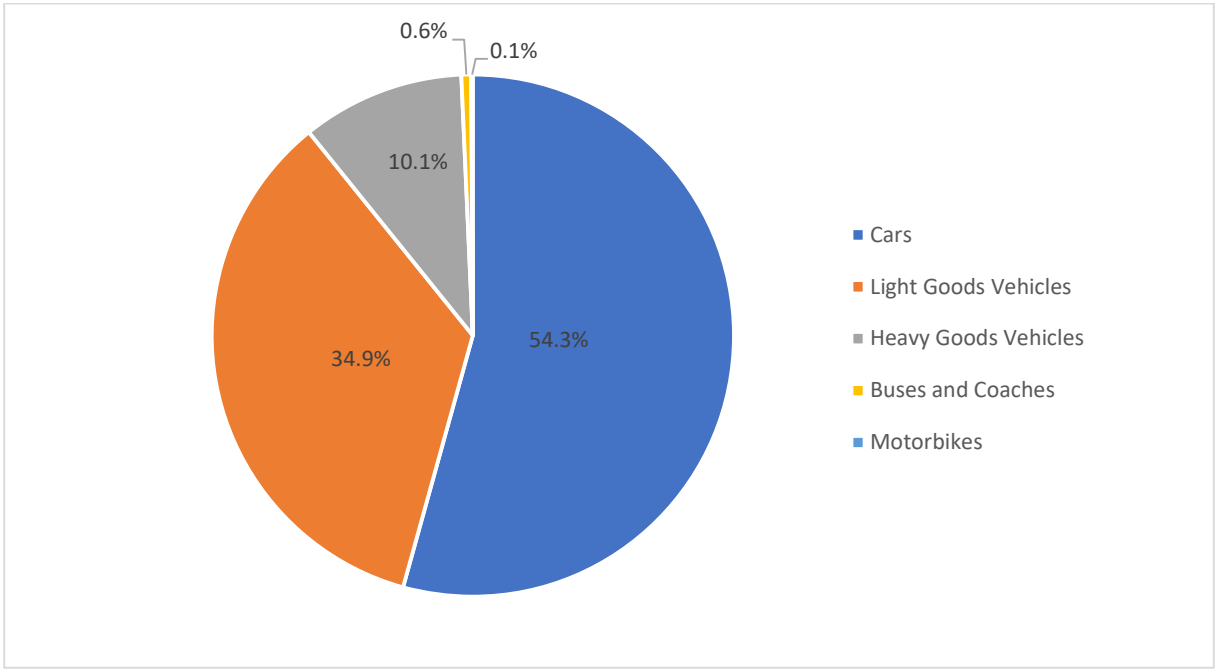


**Figure 3.2 – Percentage Contributions of Different Sources to Total Predicted $NO_x$ Road Emissions in 2022 on Cross Street**

## 3.4 Required Reduction in Emissions

Babergh District Council's 2023 Annual Status Report included data from monitoring at 8 locations in the Cross Steet AQMA during 2022. The data confirmed that the annual mean $NO_2$ concentrations did not exceed the AQO in 2022 at any monitoring location. The highest measured concentration was 32.8 µg/m$^3$. The last measured exceedances of the AQO were in 2019, which is despite increasing traffic flows on the road as shown in Figure 3.3.

**Annual Average daily flow**

| Year | Count method | Pedal cycles | Two wheeled motor vehicles | Cars and taxis | Buses and coaches | Light goods vehicles | Heavy goods vehicles | All motor vehicles |
|---|---|---|---|---|---|---|---|---|
| 2022 | Estimated from nearby links | 9 | 130 | 11170 | 21 | 2757 | 455 | 14533 |
| 2021 | Estimated from nearby links | 9 | 117 | 10407 | 19 | 2475 | 442 | 13461 |
| 2020 | Estimated from nearby links | 34 | 44 | 6853 | 38 | 1857 | 637 | 9430 |
| 2019 | Estimated from nearby links | 26 | 59 | 9385 | 60 | 2170 | 711 | 12385 |

**Figure 3.3 – UK Traffic Statistics, Site Number 77196 (Cross Street). Department for Transport, 2024[14]**

The reduction in $NO_2$ concentrations in the AQMA has been the result of the removal of the on-street parking bays within the AQMA in January 2020 (the principal measure in the AQAP), together with improvements in engine management and emissions reduction technology in the national vehicle fleet.

[13] Department for Transport. UK Traffic Statistics, 2024

Emissions from road traffic on Cross Steet contribute the largest proportion to the overall $NO_2$ concentration in the AQMA – there are no significant commercial or other sources affecting the AQMA. Other contributions would be from ambient background sources.

As the long-term trend in Annual Mean $NO_2$ concentrations within the AQMA has been consistently below the AQO, the Council was intending to consider revoking the AQMA designation following confirmation of continued satisfactory monitoring results for 2023. However, in October 2023 Defra advised the Council that data from both 2020 and 2021 must be excluded from consideration of whether the AQMA can be revoked because of the impact of the Covid-19 pandemic on traffic flows.

The highest annual mean concentrations measured in the AQMA in 2020, 2021 and 2022 were 32.8 µg/$m^3$, 33.3 µg/$m^3$ and 32.8 µg/$m^3$ respectively. Although not yet corrected/ratified, the monitoring data for 2023 also indicate that the annual mean concentrations will be significantly below the AQO – in the “low-30s”.

Monitoring data from recent years indicates that following removal of the parking bays on Cross Street, there is some significant “headroom” between measured levels and the AQO and so no further reduction in emissions is likely to be required for the Objective to be achieved in the future.

## 3.5 Key Priorities

Babergh District Council has the following priorities for the implementation of the AQAP:

Priority 1 Continue to monitor $NO_2$ concentrations throughout the AQMA to inform an assessment of the ongoing impact of removing the on-street parking bays.

Priority 2: Review the current ‘free’ parking policy for short stay parking in Council car parks.

Priority 3: Ensure new developments contribute to air quality actions with measures to improve efficiency and minimise emissions as much as possible.

# 4 Development and Implementation of Cross Street AQAP

## 4.1 Consultation and Stakeholder Engagement

In developing/updating this AQAP, we have worked with other local authorities, agencies, businesses, and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 4.14.1. In addition, we have undertaken the following stakeholder engagement:

- The Council's website
- Social media
- Letters distributed directly to households along Cross Street
- Letters/emails to other consultees

The consultation responses are included in Appendix A: Response to consultation.

**Table 4.1 – Planned Consultation**

| Consultee | Consultation Undertaken |
|---|---|
| The Secretary of State | Yes |
| The Environment Agency | Yes |
| The highways authority | Yes |
| All neighbouring local authorities | Yes |
| Other public authorities as appropriate, such as Public Health officials | Yes |
| Bodies representing local business interests and other organisations as appropriate | Yes |

## 4.2 Steering Group

The approach to the Air Quality Action Planning process in Babergh has been to use a steering group to draft the AQAP. This steering group included representatives from:

- Public Protection (BDC)
- Development Management and Strategic Planning (BDC)
- Economic Development and Climate Change (BDC)
- Growth, Highways, and Infrastructure (SCC)
- Public Health and Communities (SCC)

The steering group first met in August 2009 and met quarterly during the development of the first iteration of the AQAP. During the implementation phase of the AQAP, it met every 6-12 months to review progress and coordinate future actions. The last “in person” meeting was held in late 2019 to finalise arrangements for implementing the principal measure in the Action Plan (removal of the parking bays on Cross Street) and ongoing monitoring of its effect. Following the Covid-19 pandemic, representatives have conducted business by online meetings and emails.

The steering group identified the potential options proposed; evaluated the options with regard to air quality impact, other environmental impacts, cost, feasibility and timescales; and prioritised the options for the AQAP. The group has also collaborated to identify what traffic management interventions were required; what may influence the local pollution in the future; and other existing projects in the area that could contribute to emission reductions (or increases).

Once the AQAP has been adopted, the steering group will receive annual updates and review progress on actions, set out actions for the coming year and review the Annual Status Report.

# 5 AQAP Measures

Table 5.1 shows the Cross Street AQAP measures. It contains:

- a list of the actions that form part of the plan
- the responsible individual and departments/organisations who will deliver this action
- estimated cost of implementing each action (overall cost and cost to the local authority)
- expected benefit in terms of pollutant emission and/or concentration reduction
- the timescale for implementation
- how progress will be monitored

**NB:** Please see future ASRs for regular annual updates on implementation of these measures.

## Table 5.1 – Air Quality Action Plan Measures

| Measure No. | Measure | Category | Classification | Estimated Year Measure to be Introduced | Estimated / Actual Completion Year | Organisations Involved | Funding Source | Defra AQ Grant Funding | Funding Status | Estimated Cost of Measure | Measure Status | Target Reduction in Pollutant / Emission from Measure | Key Performance Indicator | Progress to Date | Comments / Potential Barriers to Implementation |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | Assess the ongoing impact on $NO_2$ concentrations of removing the on-street parking bays in the AQMA | Traffic management | Other | 2020 | 2025 | BDC<br>SCC | BDC | No | Funded | < £10k | Implementation | Maximum predicted reduction 16.0 µg/m$^3$ $NO_2$ | Measured concentration of $NO_2$ within AQMA | Data from 2022 and (uncorrected/unratified) data from 2023 indicates this measure has been effective in reducing $NO_2$ concentrations to well below the AQO. | Subject to the results of ongoing monitoring, it is anticipated that the AQMA Order could be revoked during 2025. |
| 2 | Review 'free' parking policy for short stay parking in Council car parks | Traffic management | Other | 2023 | 2024 | BDC | BDC | No | Funded | £10k - £50k | Planning | Reduced vehicle emissions as alternatives are encouraged | Council decision to implement charging | Currently consulting on proposals | Timetable to be confirmed pending Council decision |
| 3 | Responding to planning consultations regarding air quality impacts | Policy Guidance and Development Control Air Quality Planning and Policy Guidance | Air Quality Planning and Policy Guidance | 2024 | Ongoing | BDC | Individual Developer funded | No | Funded | £0 | Implementation | Lower $NO_x$ emissions in AQMA | Measured concentration of $NO_2$ within AQMA | Ongoing | Low emission strategies to be submitted with all commercial development planning applications that could have a material impact on the AQMA. To include measures such as: HGVs/LGVs not leaving new developments within peak period and developing workforce travel plans. |
| 4 | Installation of an additional 20 electric vehicle charging points in Council car parks in Sudbury | Promoting low emission transport | Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, Electric Vehicle recharging, Gas fuel recharging | 2023 | 2024 | BDC | BDC<br>Office for Zero Emission Vehicles | No | Funded | £100k - £500k | Implementation | Reduced vehicle emissions as encourages use of electric vehicles | Number of points installed and their use | Scheduled for completion in Spring 2024 | Part funded by On-Street Residential Charge Point Scheme. |

| Measure No. | Measure | Category | Classification | Estimated Year Measure to be Introduced | Estimated / Actual Completion Year | Organisations Involved | Funding Source | Defra AQ Grant Funding | Funding Status | Estimated Cost of Measure | Measure Status | Target Reduction in Pollutant / Emission from Measure | Key Performance Indicator | Progress to Date | Comments / Potential Barriers to Implementation |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 5 | Councils' refuse fleet run on Hydrotreated Vegetable Oil, now with 22 new HVO fuelled refuse lorries operating | Promoting low emission transport | Company Vehicle Procurement - Prioritising uptake of low emission vehicles | 2021 | Ongoing | BDC | BDC | No | Funded | £1 million – £10 million | Completed | NOx reduced by up to 30% with HVO (New Era Fuels, 2021) | Emissions from vehicles – reduced compared to older HVO fuelled vehicles | New more efficient vehicles commenced operation in 2023. | |
| 6 | Work with SCC to ensure that Air Quality is appropriately considered within the Local Transport Plan 4 (LTP4) measures for Sudbury | Policy Guidance and Development Control | Regional groups co-ordinating programmes to develop area-wide strategies to reduce emission and improve air quality | 2026 | Lifespan of LTP4 | SCC<br>BDC | SCC | No | Funded | < £10k | Planning | Reduced vehicle emissions as alternatives are encouraged | LTP4 adopted; modes of transport used; travel options available | LTP4 is currently under development. The LTP will be focused on decarbonising transport in Suffolk, and this will have associated benefits for Air Quality, as the two issues are closely related. The LTP will contain a dedicated section on Air Quality. | |
| 7 | Suffolk Climate Emergency Plan[15] | Policy Guidance and Development Control | Other policy | 2020 | 2030 | All Suffolk local authorities | All Suffolk local authorities | No | Partially funded | > £10m | Implementation | Reduced emissions from a range of sources, carbon reduction has an air quality co-benefit | Use of electric vehicle charging points; use of sustainable travel by the public; use of sustainable travel by businesses e.g. last mile delivery.<br>Specific indicators within the Plan. | Consolidation of actions over 2022-23, numerous carbon reduction actions have air quality co-benefits, there are plans to publicise this link in the future. | Suffolk Climate Emergency Plan refreshed in 2023 |

[14] Suffolk Climate Change Partnership. The Suffolk Climate Emergency Plan, 2023

| Measure No. | Measure | Category | Classification | Estimated Year Measure to be Introduced | Estimated / Actual Completion Year | Organisations Involved | Funding Source | Defra AQ Grant Funding | Funding Status | Estimated Cost of Measure | Measure Status | Target Reduction in Pollutant / Emission from Measure | Key Performance Indicator | Progress to Date | Comments / Potential Barriers to Implementation |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 8 | Production of Suffolk Air Quality Strategy[16] | Policy Guidance and Development Control | Regional groups co-ordinating programmes to develop area-wide strategies to reduce emission and improve air quality | 2023 | Ongoing (lifespan of current Action Plan is 2023-24) | SCC<br>All Suffolk district and boroughs councils<br>NHS<br>University of Suffolk | SCC | No | Partially funded | Not quantified | Implementation | Reduced emissions from range of sources due to behaviour change | Actions and awareness of the public; specific indicators within the Action Plan | The Suffolk Air Quality Profile was published in 2021, leading to air quality becoming a priority for the Suffolk Health and Wellbeing Board (and therefore SCC Public Health). Suffolk-wide Air Quality Strategy developed and published in 2023 in conjunction with all Suffolk district and borough councils. Community Engagement Plan implemented. | |
| 9 | Annual Clean Air Day Campaigns, 2023-2028 | Public information | Via the internet | 2023 | Ongoing | All Suffolk local authorities | SCC<br>All Suffolk local authorities | No | Funded | < £10k | Planning | Reduced vehicle emissions due to increased awareness | Actions and awareness of the public | Awaiting 'theme' to be announced by national campaign organisers.<br>Plans and arrangements in place from campaigns in previous years. | Previous campaigns have included social media, newsletters, school presentations, circulation of materials to schools, production of health-based video. Campaigns co-ordinated with Suffolk Air Quality Group including Public Health. |
| 10 | Promotion of active and alternative travel schemes in Sudbury schools | Promoting travel alternatives | Other | 2022 | Ongoing | BDC<br>SCC | BDC<br>SCC | No | Funded | £10k - £50k | Implementation | Reduced vehicle emissions in locality of schools | Provision and use of sustainable and active travel | All schools in Suffolk have a School Travel Plan. More than 250,000 young cyclists trained to date through 'Bikeability' scheme. During 2023 Thomas Gainsborough and Hillside schools | Ongoing engagement with schools |

[15] Suffolk County Council. Air Quality Strategy and Action Plan, 2023

| Measure No. | Measure | Category | Classification | Estimated Year Measure to be Introduced | Estimated / Actual Completion Year | Organisations Involved | Funding Source | Defra AQ Grant Funding | Funding Status | Estimated Cost of Measure | Measure Status | Target Reduction in Pollutant / Emission from Measure | Key Performance Indicator | Progress to Date | Comments / Potential Barriers to Implementation |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | | | | commenced participating in the Active Travel Ambassadors scheme. | |
| 11 | Promotion of sources of information for sustainable travel on the Council's website | Public information | Via the internet | 2023 | Ongoing | BDC | BDC | No | Funded | < £10k | Implementation | Reduced emissions due to improved awareness | Use of sustainable travel | New website launched in summer 2023; information updated and to be regularly reviewed. | |
| 12 | Relaunch the Suffolk (vehicle) Idling Action Campaign | Public information | Other | 2024 | Ongoing during 2024 | All Suffolk local authorities | All Suffolk local authorities | No | Funded | < £10k | Planning | Reduced emissions due to improved awareness | Actions and awareness of the public | Revamped campaign launch Mar 2024. Refreshed messaging, range, and content of promotional materials. Events planned for community group, school, and business events. | Relaunch currently planned for end of Feb 2024 |

# Appendix A: Response to Consultation

**Table A.1 – Summary of Responses to Consultation and Stakeholder Engagement on the AQAP**

| Consultee | Category | Response |
|---|---|---|
| East Suffolk Council | | The proposed measures are considered proportionate. |
| Environment Agency | | Supportive of the proposal to continue monitoring $NO_2$ concentrations in the AQMA to confirm that the data collected in 2022 was not the result of a drop in vehicle usage during the Covid-19 pandemic.<br>Suggested additional Action Plan measures ('No Idling' street signage; green walls, re-routing footpaths; BDC fleet emissions). |
| Suffolk County Council Public Health | | Suggestions made for incorporating greater detail of the population living in or near the AQMA, and for updating references to Action Plan measures where SCC is the lead agency. |

# Appendix B: Reasons for Not Pursuing Action Plan Measures

**Table B.1 – Action Plan Measures Not Pursued and the Reasons for that Decision**

| Action category | Action description | Reason action is not being pursued (including Stakeholder views) |
|---|---|---|
| Traffic management | Street signage in the AQMA asking drivers to not idle engines | Removal of the parking bays means that there is now free flow of traffic and so this measure is not warranted. |
| Other | Planting of green walls or re-routing footpaths | The 'street canyon' configuration of the road, narrow footpaths and properties in the AQMA mean that this is not a feasible option. |

# Glossary of Terms

| Abbreviation | Description |
|---|---|
| AQAP | Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values |
| AQMA | Air Quality Management Area – An area where air pollutant concentrations exceed/are likely to exceed the relevant Air Quality Objectives. AQMAs are declared for specific pollutants and objectives |
| AQO | Air Quality Objectives - A nationally defined set of health-based concentrations for nine pollutants, seven of which are incorporated in Regulations, setting out the extent to which the national standards should be achieved by a defined date. There are also vegetation-based objectives for Sulphur dioxide, Ozone and Nitrogen oxides. |
| AQS | Air Quality Strategy |
| ASR | Air quality Annual Status Report |
| Defra | Department for Environment, Food and Rural Affairs |
| Exceedence | A period of time when the concentration of a pollutant is greater than the appropriate Air Quality Objective. This applies to specified locations. |
| LTP | Local Transport Plan |
| $NO_2$ | Nitrogen dioxide |
| $NO_x$ | Nitrogen Oxides |
| µg/m3 | Microgrammes per cubic metre |

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