



Cheshire East Borough Council Air Quality Action Plan 2020-2025

In fulfilment of Part IV of the
Environment Act 1995
Local Air Quality Management
March 2021

Cheshire East Borough Council

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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 actions we will take to improve air quality in Cheshire East between 2020 and 2025.

This Action Plan replaces the previous Action Plan, which covered the period 2018 to 2023. A new updated Plan is required, due to the declaration of two new Air Quality Management Areas (AQMAs) and the revocation of seven existing AQMAs. This AQAP highlights existing measures and new initiatives. These measures fall into two categories:

- General action measures which aim at addressing air quality across the entire Borough
- AQMA site specific measures to help tackle poor air quality in our AQMAs

Our plans are aimed at being achievable, clear and have anticipated target delivery dates. We have also developed this plan through clear consultation processes with relevant stakeholders.

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.

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion¹. The Council is committed to reducing the exposure of people within Cheshire East to poor air quality in order to improve health.

We have developed actions under eight broad topics:

- Environmental permits
- Policy guidance and development control
- Promoting low emission transport
- Promoting travel alternatives
- Public information, awareness and education
- Transport planning and infrastructure
- Traffic management
- Vehicle fleet efficiency

¹ Defra. Abatement cost guidance for valuing changes in air quality, May 2013

Our priorities are to tackle vehicular emissions by applying AQMA targeted measures as well as taking a holistic/integrated approach across Cheshire East. These measures include:

- ❖ development and planning
- ❖ traffic management
- ❖ alternative travel
- ❖ active travel
- ❖ low emission transportation
- ❖ transportation
- ❖ public awareness
- ❖ green infrastructure

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. Therefore we will continue to work with regional and central government on policies and issues beyond our direct influence.

Responsibilities and Commitment

This AQAP was prepared by the Air Quality team of Cheshire East Council with the support and agreement of the Air Quality Steering Group.

This AQAP has been approved by the Air Quality Steering Group. The Air Quality Steering Group consists of high level Council officers such as the Director of Environment and Neighbourhood Services, the Director of Highways and Infrastructure, the Director of Public Health, Head of Planning, Head of Regulatory Services and the Head of Strategic Transport and Parking.

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

If you have any comments on this AQAP please send them to the Air Quality team at:

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1 Introduction



Picture Credit – Martin Brown

Cheshire East is comprised mostly of rural areas and some urban towns. These urban towns have pocket areas that suffer from poorer air quality as a result of traffic/vehicular related emissions. This has resulted in those areas having concentrations of pollutants such as , Nitrogen Dioxide (NO₂) exceeding the national Air Quality Objective (AQO). Areas with these exceedances are designated Air Quality Management Areas (AQMA).

The national Air Quality Objectives are a health based guideline set out in Part IV of the Environment Act 1995 to protect people from exposure to poor air. The air pollutants of concern within Cheshire East are NO₂ and Particulate Matter (PM) and their objectives are listed in Table 1.1.

In turn this will positively impact on the health and quality of life of the residents and visitors in the area.

This Action Plan has been developed in recognition of the legal requirement on the local authority to work towards the Air Quality Strategy (AQS) objectives, under Part IV of the Environment Act 1995 and associated regulations. Under the Act, the Council is mandated to designate an AQMA where the concentrations of the pollutant measured is in breach of the Air Quality Objective in Table 1.1.

This Plan will be reviewed every five years as a minimum with progress on identified measures reported annually within the Annual Status Report (ASR).

The actions in this report are specifically aimed at NO₂ reduction. However, these plans will significantly and positively help in the reduction of PM. Actions will particularly focus on vehicular emissions from road transport as this is the dominant source of air pollution within the Borough.

Table 1.1 - Relevant Air Quality Objective summary

Pollutant	Concentration	Measured as
Nitrogen dioxide (NO ₂)	40 µg/m ³	Annual average
	No more than 18 exceedances of 200 µg/m ³ per year	1-hour average
Particulate Matter (PM ₁₀)	40 µg/m ³	Annual average
	No more than 35 exceedances of 50 µg/m ³ per year	24-hour average
Particulate Matter (PM _{2.5})	Work towards reducing emissions/concentrations	Annual average

2 Summary of Current Air Quality in Cheshire East

Following the revocation of 7 historic AQMA's, Cheshire East has 12 remaining AQMAs which currently breach the NO₂ Air Quality Objective (Table 2.1). An important NO₂ contributor in Cheshire East is traffic/vehicular emissions and therefore it is not surprising that the AQMAs are predominantly based in our towns where there is a high volume of traffic, busy junctions and areas of congestion.

Across the Borough, NO₂ concentration measurements are conducted using both continuous and passive monitoring systems, i.e. diffusion tubes. Figure 2.1 shows the location of the active NO₂ monitoring sites. These sites are reviewed regularly to make sure that the monitoring is still relevant to sensitive receptor exposure. Our monitoring locations can also be found on our website².

Please refer to the most current Annual Status Report for more detailed air quality information.

² Cheshire East Council

<https://cheshireeast.maps.arcgis.com/apps/MapJournal/index.html?appid=c91838f3f37e428a89bc743948a3e929>



Figure 2.1 - Map of Cheshire East Borough showing the active NO₂ diffusion tubes³

³ © Crown copyright and database rights 2021 Ordnance Survey 100049045

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Table 2.1- Declared Air Quality Management Areas

AQMA Name	Date of Declaration	Pollutants and Air Quality Objectives	One Line Description	Level of Exceedance: Declaration ($\mu\text{g}/\text{m}^3$)	Name and Date of AQAP Publication
AQMA West Road, Congleton	01/05/2005	NO ₂ Annual Mean	Between the Wagon and Horses gyratory and the fire station roundabout	61	Cheshire East Borough Council Air Quality Action Plan 2018-2023: July 2018
AQMA A34/A54 Rood Hill, Congleton	01/05/2005	NO ₂ Annual Mean	A short stretch at the Rood Hill A34/A54 traffic lights	60	Cheshire East Borough Council Air Quality Action Plan 2018-2023: July 2018
AQMA Hospital Street, Nantwich	16/12/2006	NO ₂ Annual Mean	A short stretch of the A534 through Nantwich	59	Cheshire East Borough Council Air Quality Action Plan 2018-2023: July 2018
AQMA Lower Heath, Congleton	01/04/2008	NO ₂ Annual Mean	A short stretch of the A34 at Lower Heath	47	Cheshire East Borough Council Air Quality Action Plan 2018-2023: July 2018
AQMA A5022/A534, Sandbach	01/04/2008	NO ₂ Annual Mean	A number of properties around the junction of the A534 and the A5022	47	Cheshire East Borough Council Air Quality Action Plan 2018-2023: July 2018
AQMA A6 Market Street, Disley	01/04/2010	NO ₂ Annual Mean	A stretch of the A6 running from Market Street/Buxton Old Road crossroads in the west, to the junction with Redhouse Lane in the east	62	Cheshire East Borough Council Air Quality Action Plan 2018-2023: July 2018
AQMA A523 London Road, Macclesfield	01/04/2010	NO ₂ Annual Mean	An area from the Mill Lane/Silk Road junction in the north, to a point 65m south of the London Road Terrace junction in the south	43	Cheshire East Borough Council Air Quality Action Plan 2018-2023: July 2018
AQMA Chester Road, Middlewich	01/10/2017	NO ₂ Annual Mean	A stretch of Chester Road in Middlewich	42	Cheshire East Borough Council Air Quality Action Plan 2018-2023: July 2018
AQMA Hibel Road, Macclesfield	01/10/2017	NO ₂ Annual Mean	A short length of Hibel Road, Macclesfield	44	Cheshire East Borough Council Air Quality Action Plan 2018-2023: July 2018
AQMA Broken Cross, Macclesfield	01/10/2017	NO ₂ Annual Mean	An area around Broken Cross Roundabout, Macclesfield	44	Cheshire East Borough Council Air Quality Action Plan 2018-2023: July 2018
AQMA A533 Lewin Street, Middlewich	10/10/2019	NO ₂ Annual Mean	A section of the A533 Lewin Street, Middlewich	41	Cheshire East Borough Council Air Quality Action Plan 2020-2025: TBC
AQMA A537 Chelford Road, Knutsford	10/10/2019	NO ₂ Annual Mean	A section of the A537 Chelford Road, Knutsford	40	Cheshire East Borough Council Air Quality Action Plan 2020-2025: TBC

3 Cheshire East Council's Air Quality Priorities

3.1 Public Health Context

The Public Health Outcomes Framework (PHOF) is a Department of Health data tool for England. It is intended to focus on Public Health actions to increase life expectancy and reduce differences in life expectancy between communities⁴. The Public Health Outcome Framework includes air quality as an indicator of life expectancy. As such, Cheshire East Public Health and Air Quality teams are working together to prioritise measures on air quality within the Borough to help reduce the effect of air pollution on public health. The main source of NO₂ and PM in Cheshire East is road traffic, thus measures that will reduce emissions and also have a complementary effect on health are encouraged. For example, encouraging active travel (walking and cycling) will result in a decrease in traffic congestion, a reduction of emissions and also help to improve general health.

The Cheshire East Air Quality and Public Health teams are also working together to communicate air quality effects on health to the public. To do this, we have launched an air quality awareness campaign themed "SHOW THE AIR YOU CARE". This campaign encourages everyone to do their bit to help tackle air pollution. We will also look to develop a Cheshire East based health impact assessment.

3.2 Planning and Policy Context

There are a number of policies, strategies and plans at national and local levels which contribute towards improvements in air quality. Described below are some of the local strategies used within Cheshire East:

- **Cheshire East Air Quality Strategy (AQS):** - this is an overarching document providing an overview of the roles and responsibilities of those Council services which can help influence air pollution. It promotes consistency across the range of policies that influence/affect air quality and ensures that air quality is considered in all relevant decisions to support improvement across the Borough.

⁴ LAQM PG16 <https://laqm.defra.gov.uk/documents/LAQM-PG16-April-16-v1.pdf>

The AQS is critical to the implementation of specific actions through the AQAP and as such contains within it, clear performance indicators to show that actions within the AQAP are being carried out.

- **Cheshire East Low Emission Strategy (LES):** - the LES is a policy which includes a plan of actions that are designed to lower the emissions from transport and encourage developers to implement sustainable planning systems/developments to improve air quality. The LES is intended to fit with both National and Local Plan policies with respect to supporting sustainable development. This will manage the overall contribution of developments within the Borough rather than looking at each application on a case by case basis and encourage developers to understand the importance of protecting local air quality and their role in mitigating any impact from development.
- **Cheshire East Local Transport Plan (LTP):** - this is a framework for strategic and local highway transport planning in the Borough. It ensures that air quality is considered within all aspects of transportation and the local transport strategy. This includes sustainable transport and the management of travel demand by cars and focuses on areas such as traffic management and transport infrastructure in all modes of transportation. Examples include the Cheshire East Cycling Strategy which promotes and improves active travel and lifestyle, the Sustainable Modes of Travel to School Strategy, electric vehicle infrastructure and travel planning. The Transport and Highway team are part of the Air Quality Steering Group and work alongside the Air Quality team.
- **Cheshire East Environment Strategy:** - The Environment Strategy sets out the Council's priority actions to reduce emissions and become a carbon neutral council by 2025.
- **Cheshire East Local Plan Strategy:** - The Local Plan Strategy sets out the overall vision and planning strategy for the borough. It contains policies to make sure that new development addresses the economic, environmental and social needs of the area. A strategic priority of the plan is to address the local causes of air pollution, reducing the impact on local communities. Policies in the plan encourage development to be located and designed so as not to result in harmful or cumulative impacts upon air quality. In particular, development should support improvements to air quality, not contradict the Air Quality

Strategy or Air Quality Action Plan and seek to promote sustainable transport policies.

- **Site Allocations and Development Policies Document (SADPD):** - The SADPD is currently in draft form. Once adopted, it will form the second part of the Cheshire East Local Plan and set more detailed planning policies to support the strategy set out in the Local Plan Strategy. It includes a number of draft policies that seek to assist with air quality improvements, including the protection and enhancement of trees and woodlands. The draft plan is also clear that planning permission will be refused where the construction or operational characteristics of development would cause harm to air quality (including cumulatively with other development), unless suitable mitigation measures are adopted to mitigate the impact.

3.3 Source Apportionment

In Cheshire East, like many other Boroughs in the United Kingdom and cities all over the world, the dominant source of air quality degradation is vehicular emissions, where any increase in these emissions will continue to exacerbate the situation.

Therefore, the AQAP measures presented in this report are designed to predominately target traffic (vehicular) emissions.

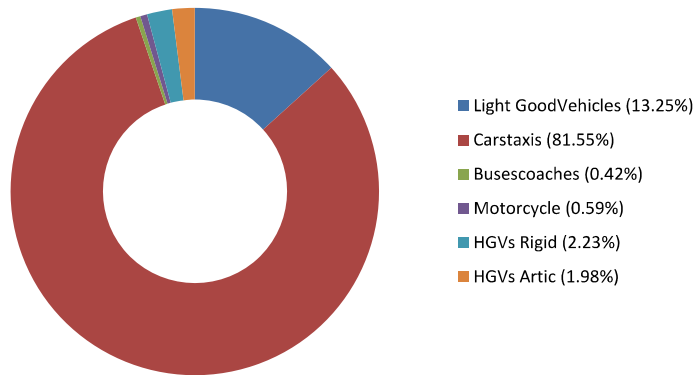
NO₂ concentrations are currently widely measured within Cheshire East, whilst other pollutants such as PM are not currently monitored. However, PM resulting from vehicular emissions can be estimated using the Department of Food and Rural Affairs (Defra) quantification tool. The NO₂ measurement made within the Borough is used to determine where there are breaches of the NO₂ objective.

3.3.1 Fleet

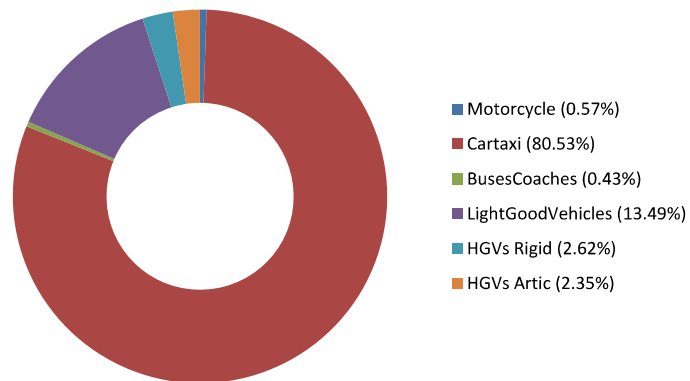
Fleet data used to calculate the vehicular emissions were obtained from the Department of Transport (DfT) website. The fleet data include fleet Average Annual Daily Flow (AADF), fleet type, road type (i.e. urban, rural and motorway), and count year for Cheshire East. Figure 3.1 shows percentage contribution of the different fleet.

Figure 3.1- Percentage fleet contribution of Cheshire East AADF

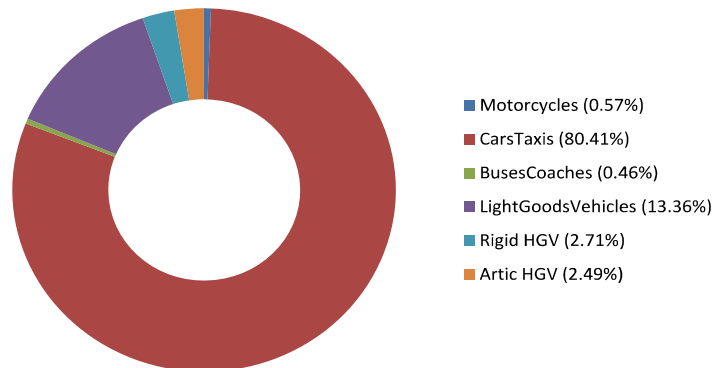
2019



2018



2017



2016

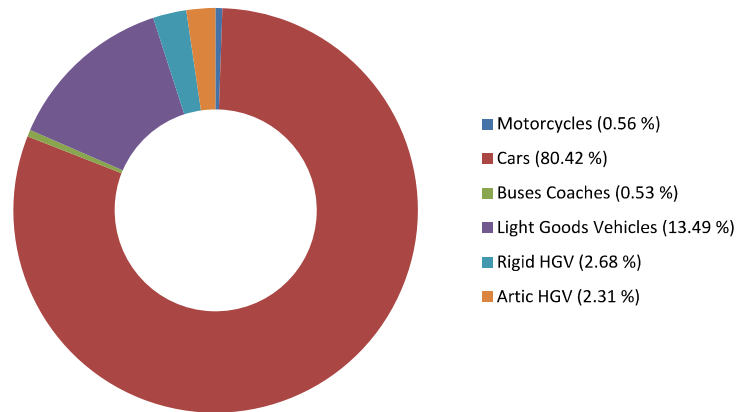


Figure 3.1 shows that car fleet (which includes taxi) in Cheshire East is the most abundant vehicle type, followed by LGVs.. The fleet percentage contribution trend observed has remained similar over the compared years (2016 -2019).

3.3.2. Vehicular Emission Contributions

In order to estimate the vehicular emissions contribution, the fleet composition and characteristics and speed limits collected locally from Cheshire East Transport team, were input into the Defra Emission Factors Toolkit (EFT).

The EFT_2016 version 7.0 was used for the year 2016, EFT version 9 was used for the year 2017 and EFT version 10.1 (the most recent version) was used for years 2018 - 2019 analysis in this AQAP.

EFT version 7.0 was used for the year 2016 in order to retain continuity from the previous AQAP and version 9 for 2017 because year 2017 is not available for selection in version 10.

The EFT is able to estimate emissions of pollutants such as nitrogen oxides (NO_x – a combination of nitrogen oxide and nitrogen dioxide, or NO and NO₂), PM₁₀ and PM_{2.5} from vehicular sources. Table 3.1 show the total emissions for each pollutant from the vehicular sources. Figure 3.2 shows the estimated average percentage proportions from each fleet for the years 2016 to 2019 for the pollutants NO_x, PM_{2.5} and PM₁₀.



Table 3.1- Total emissions for each pollutant from vehicular sources

Year	NO _x	PM ₁₀	PM _{2.5}
2016*	1624	123	78
2017*	1773	122	78
2018**	1558	116	73
2019**	1500	120	74

Annual total emissions are in Kg/km, * means equal count points, ** means count points increased by 18, *** means count points increased by 76.

The largest source of NO₂ emissions in the UK is from vans and cars which have significantly grown in number over the past 10 years⁶, especially diesel vehicles which contribute to most of the NO₂ emissions⁵.

Figure 3.2 shows the trend in the fleet average percentage contribution for Cheshire East. Cars make up about 81% (Figure 3.1) of the fleet on the Borough's roads based on AADF and of that percentage, diesel cars account for most of the vehicular NO_x emission's contribution (ranging from 44% – 48% in Figure 3.2). In fact, for all three pollutants and for all the years calculated, diesel cars are shown to be the highest contributors (Figure 3.2).

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LGVs and HGVs (Artic and Rigid) make up approximately 13% and 5% of the road fleet respectively (Figure 3.1). HGV fleet average emission contribution, showed a reduction in NO_x for the year 2018 and 2019 but PM emissions remained relatively the same (Figure 3.2). This could be attributed to improved engine systems and fuel efficiency improvements, thereby resulting in less exhaust related emissions. The fact that PM has remained the same could be as result of no change in emissions especially from the non-exhaust emissions.

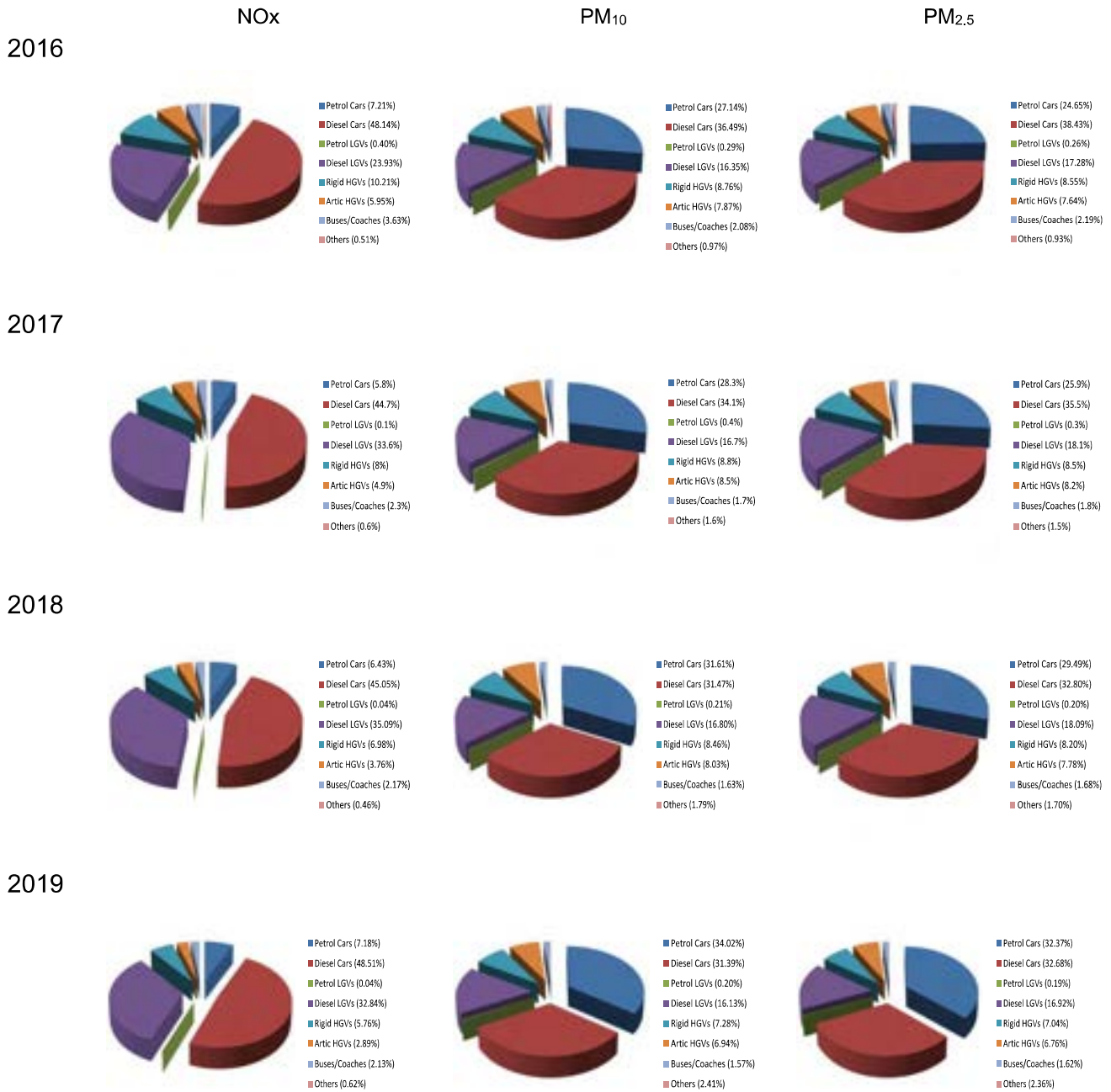
Table 3.1 shows that there is a decrease in NO_x emissions from years 2017 to 2019, which agrees with the report by DfT - Road Traffic estimates: Great Britain 2019. They reported that NO_x and PM₁₀ from road transport in the UK fell between 2000 and 2018. However we have observed that the PM₁₀ and PM_{2.5} fluctuated over the compared years.

PM_{2.5} and PM₁₀ emission contribution from petrol cars in comparison to NO_x emissions observed is higher. This indicates that in addition to the direct exhaust tail emissions, other non-exhaust sources such as brakes, tyres and re-suspension from the road surface are contributing factors. However, diesel cars when compared to petrol cars still show higher emissions of PM (2.5 and 10).

⁵ Department of Environment, Food and Rural Affairs (2004) The Air Quality Expert Group Nitrogen Dioxide in the United Kingdom summary. <https://uk-air.defra.gov.uk/assets/documents/reports/ageg/nd-summary.pdf>

⁶ Department of Environment, Food and Rural Affairs (2015) Draft plans to improve air quality in the UK Tackling nitrogen dioxide in our Towns and cities. UK overview document https://consult.defra.gov.uk/airquality/draft-ag-plans/supporting_documents/Draft%20plans%20to%20improve%20air%20quality%20in%20the%20UK%20Overview%20document%20September%202015%20final%20version%20folder.pdf

Figure 3.2 - Estimate of vehicular emission contribution for Cheshire East 2016-2019



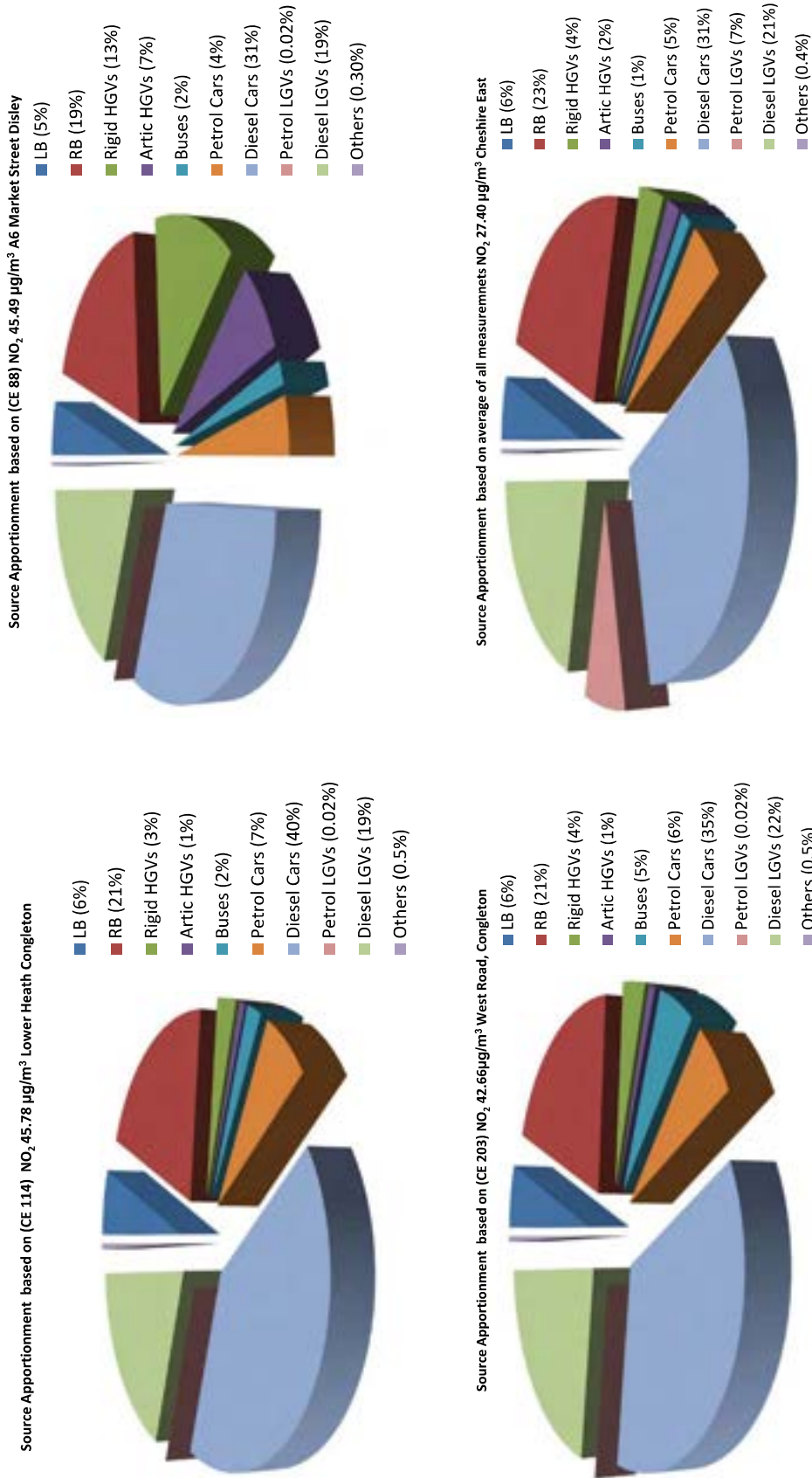
Others=contribution from motorcycle and other energy/fuel types used by vehicles

3.3.2 Air Quality Management Area source apportionment

To understand the sources that influence air quality and identify the key priorities for the Action Plan, a source apportionment exercise was carried out by Cheshire East Council. The source apportionment was calculated for NO₂, using the method described in the Technical Guidance LAQM.TG16 Chapter 7.

Figure 3.3 shows the source apportionment for the three AQMAs with the highest NO₂ concentration and then Cheshire East overall.

Figure 3.3 - Source apportionment for some of the AQMAs and Cheshire East base year 2019 NO₂



Others=contribution from motorcycle and other energy/fuel types used by vehicles. LB=Local Background, RB=Regional Background

Local background (LB) shows the percentage contribution of the background air quality in the area (Figure 3.3). This can be influenced by other NO₂ local sources such as boilers, Combined Heat and Power (CHP) Plants, Non-Road Mobile Machinery (NRMM), agriculture, aviation, industrial and other sources in both the AQMAs and Borough wide. These local sources can add to the local background to give rise to areas of high concentration.

The regional background (RB) shows the influence of the sources from outside the Borough, which the Local Authority has no influence over.

Vehicular emissions contribute more than 60% of NO₂ emissions in both the AQMAs and Borough wide source apportionment results. (Figure 3.3).

Figure 3.3 shows that cars contribute between 35-47%, LGVs 19-22%, and HGVs 4-20% of NO₂ emissions in the source apportionment results. HGV NO₂ emission contribution across the AQMAs and the Borough is about 6%, with Disley showing the highest contribution of 20% in comparison to the other AQMAs listed (Figure 3.3).

Therefore, it is apparent that the impact of LGV (cars and vans) emissions is significant across the AQMAs and the Borough as a whole. Therefore, measures to reduce the impact of LGVs (cars and vans combined) emissions should be implemented in the AQMAs to help improve air quality. This also has the potential to address the further impact of LGV impact where it creates congestion at pinch points throughout the highway network.

3.4 Required Reduction in Emissions

The key priority areas for action are where the measured NO₂ concentration is in breach of the NO₂ objectives. These areas are within the AQMAs and therefore the AQAP aims at reducing the NO₂ concentrations in these areas as much as possible, with an overall goal of achieving compliance with the UK National Air Quality Objective. Over several years the NO₂ concentration across Cheshire East has been improving; see the current ASR for concentration trend. Table 3.2 shows the three AQMAs with the highest NO₂ concentrations and the road NO_x reduction expressed as a percentage that is needed to attain the objective concentration. This was calculated in line with Technical Guidance LAQM.TG16 Chapter 7.

Table 3.2 - Required Reduction Emission to achieve NO₂ national objective in the AQMAs

Tube ID	Location	Town	2019 NO ₂ Measured (µg/m ³)	NOx equivalent of NO ₂ (µg/m ³)	NOx required concentration (µg/m ³)	Road NOx reduction (µg/m ³)	Road NOx reduction (%)
CE104	13 West Road	Congleton	42.66	69.52	60.8	8.72	12.54
CE114	28 Lower Heath	Congleton	45.78	74.87	58.23	16.64	22.23
CE277	9 Market Street	Disley	45.49	77.49	61.52	15.97	20.61

3.5 Key Priorities

From the source apportionment work (Figure 3.3), it was concluded that the major contributors to NO₂ in all the AQMAs are LGVs (vans and cars) but the influence of HGVs can not be discounted, particularly given the higher HGV concentrations in Disley. Therefore, AQMA specific targeted measures will be implemented to try and reduce the impact of these three vehicle types. In addition this targeted work will be supported by an integrated approach to manage air quality across the Borough. This integrated approach will be applied in the priority areas of:

- ❖ development and planning
- ❖ traffic management
- ❖ alternative travel
- ❖ active travel
- ❖ low emission transportation
- ❖ transportation
- ❖ public awareness
- ❖ green infrastructure

4 Development and Implementation of Cheshire East Council's AQAP

4.1 Consultation and Stakeholder Engagement

As part of the process of updating the action plans we have consulted with a number of different stake holders such as: local authorities, external agencies, Cheshire East Highways, Cheshire East Public Health, Parish Councils, businesses and the local community.

Engaging with the local community and residents was extremely helpful. Their local knowledge is fundamental to the development of local actions as they helped to identify air quality related problems within their towns.

The response to our public consultation engagement is given in Appendix A.

4.2 Steering Group

The development of an Air Quality Steering Group was approved by the Public Health Forum in April 2016. It aims to encourage greater involvement of The Director of Public Health and other relevant services within the Council that can have a significant role to play in the improvement of air quality from both a policy and infrastructure perspective

The group is made up of senior officers from Public Health, Planning, Highways, Strategic Transport and Environmental Health. The group meets quarterly and is tasked with the strategic overview of the Council's approach to improving air quality and the direction of services to achieve positive results.

The proposed measures for inclusion in the AQAP were discussed by the group, giving stakeholders the opportunity to provide input, generate new ideas, critically appraise the measures proposed and provide a sense check that the measures proposed are realistic and achievable. The Steering Group were also kept updated on the outcomes of the public consultation work.

5 AQAP Measures

Following the review of the previous AQAP covering 2018 - 2023, some actions have been removed, either because they have been completed or because we are no longer taking them forward. These removed actions can be found in Table B1. For any measure we are no longer taking forward, a reason for this decision is also included.

The completed traffic management measures (see Table B1) such as road works, traffic light signalling adjustments, pelican crossing improvements and repainting of road markings, all help to reduce emissions associated with traffic congestion by improving the flow of traffic.

Completed measures that required a review of existing circumstances to be taken place, as indicated in Table B1, presented the following benefits:

- Review the impact of A556 bypass – NO₂ data from 2016 – 2020 showed a reduction in concentration, thereby suggesting that the introduction of the bypass has improved air quality in the Mere area. This review via monitoring and evaluation of the data, helped us to quantify the NO₂ reduction (see Annual Status Reports (ASR) and monitoring data).
- Other reviews such as looking at parking restrictions, vehicle weight restrictions, railway crossing timing and modelling of flows and priorities of Ashfield Way, Sandbach, were beneficial because they highlighted whether carrying out these projects would make a positive impact on air quality, where they would not make any difference and where due to health and safety reasons, the measure cannot be carried out.
- Therefore, completing these reviews helped to direct and inform further projects to implement. For example, the outcome of the Ashfield Way, Sandbach review is being considered by CE Highways due to the potential positive impact on air quality.

Detailed benefits of these completed measures can be found in the ASR, which is submitted to Defra. Copies of current and previous ASRs can be found on the Cheshire East website.

The rest of section 5 discusses the measures to be applied to manage and achieve improved Air Quality standards across the whole of Cheshire East. These include

overarching and supportive work, general actions to improve air quality and also actions that are relevant to individual Air Quality Management Areas.

5.1 Air Quality Monitoring and Management Measures

Part IV of the Environment Act 1995 requires that all local authorities in England, Northern Ireland, Scotland and Wales should conduct local Air Quality reviews. Section 82(1) of the Act requires that these reviews should include assessment of the current air quality in the area.

Cheshire East is committed to taking action to improve air quality and protect the public through a number of more general and ongoing actions including;

- The use of diffusion tubes and real-time monitors for air quality monitoring in order to produce high quality data on which to monitor effectiveness of initiatives and base decisions. This will also increase confidence in monitoring and resultant data to provide support for modelling work.
- Annual review of air quality monitoring sites so as to ensure that they are suitable and relevant to monitoring having regard to sensitive sites.
- Review and assess air quality within the Borough, in accordance with the government guidance and policies, making sure that statutory requirements are met.
- Review of the Local Emission Inventory for source apportionment providing a better understanding of pollutant contribution and to improve any local air quality modelling work.
- Regulation and enforcement of legislative requirements for industrial processes in line with the Environmental Permitting regime. .
- Work with partner agencies including Highways, DfT, Public Health and the Environment Agency to help coordinate activities and disseminate information which promotes and improves air quality within Cheshire East

NB: Progress on the implementation of these measures will be reported in future Annual Status Reports.

5.2. General Action Plan Measures

Table 5.1 sets out the general measures that will be implemented throughout the Borough in relation to improving Air Quality

Table 5.1 - Air Quality Action Plan Measures general actions Borough wide

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source and Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date
GN1/2020	Implement and report on the Air Quality Strategy	Policy Guidance and Development Control	Other policy	2010	Annual	CE Environmental Health	None	< £10k	Implementation	LOW	Published AQS and annual report	Completed AQS published and indicators achieved
GN2/2020	Implement the Low Emission Strategy	Policy Guidance and Development Control	Low Emissions Strategy	2011	2020	CE Environmental Health	None	< £10k	Completed	MEDIUM	Published LES	LES published and implementation ongoing
GN3/2020	Integration of air quality into all relevant council policies and documents	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	2010	2022	CE Environmental Health, CE Development Management	None	< £10k	Planning	LOW	Published Supplementary Planning Document (SPD)	Draft SPD is with Planning Policy for comments and then it will go out on consultation

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GN4/2020	Use the existing development control processes to improve air quality	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	2010	Ongoing	CE Environmental Health, CE Development Management	None	< £10k	Implementation	MEDIUM	Access all air quality impact assessments in accordance with EPUK Guidance	100% applications screened for AQ impact. Mitigation required as necessary
GN5/2020	Continue to regulate environmental permits	Environmental Permits	Other measure through permit systems and economic instruments	2010	Ongoing	CE Environmental Health	None	< £10k	Implementation	MEDIUM	Inspection programme developed and delivered each year in accordance with risk assessments	2020: 124 Permitted processes (Part B) and 1 (Part A2). During 2020 43/59 routine inspections scheduled were completed
GN6/2020	Regularly review the website to raise awareness and provide information	Public Information	Via the Internet	2010	Ongoing	CE Environmental Health, CE Public Health, CE Comms	None	< £10k	Implementation	It is difficult to quantify reduction as a result of this measure. MEDIUM	Functional website with up to date information	Launched 'Show the air you care' campaign on Clean Air Day 2020.
GN7/2020	Produce resources on air quality for school children to provide better awareness	Public Information	Via other mechanisms	2018	Ongoing	CE Environmental Health	None	< £10k	Implementation	It is difficult to quantify reduction as a result of this measure. MEDIUM	Air quality education campaign	Interactive lesson plan for Yrs 5 & 6 developed and delivered to 16 primary schools so far

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GN8/2020	Working with schools to produce and implement their travel plan	Promoting Travel Alternatives	School Travel Plans	2010	Ongoing	CE Environmental Health, CE Strategic Transport	CE Strategic Transport	< £10k	Implementation	It is difficult to quantify reduction as a result of this measure. MEDIUM	School Travel Plans	126 schools have so far signed up to Modeshift STARS to begin producing plans
GN9/2020	Support and encourage establishments and individuals to produce, implement and make available travel plans	Promoting Travel Alternatives	Workplace Travel Planning	2010	Ongoing	CE Environmental Health, CE Strategic Transport	None	< £10k	Implementation	It is difficult to quantify reduction as a result of this measure. MEDIUM	Travel planning conditions on planning applications	1073 Planning consultations (2020), 462 were recommended conditions to mitigate air quality impacts. Travel planning advice and support is available on our website
GN10/2020	Support a staff travel plan, car share scheme and lift share	Promoting Travel Alternatives	Workplace Travel Planning	2010	2022	CE Carbon Neutral team, CE Strategic Transport	None	< £10k	Planning	It is difficult to quantify reduction as a result of this measure. MEDIUM	Staff travel plan	The Carbon Neutral team are reviewing staff travel as part of their project work
GN11/2020	Active transport	Promoting Travel Alternatives	Promotion of cycling	2010	Ongoing	CE Environmental Health, CE Strategic Transport, CE Public Health	Defra, Sustrans, DfT Partially funded	£100k - £500k	Planning	It is difficult to quantify reduction as a result of this measure. LOW	Additional cycling schemes	AQ grant money for storage, signage and cycle buddy scheme in Congleton. Improved walking and cycling route between Alderley Park

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GN12/2020	Educate and where possible enforce requirements to switch off idling engines	Traffic Management	Anti-idling enforcement	2010	Ongoing	CE Environmental Health, CE Parking Services	None	< £10k	Implementation	MEDIUM	Anti-idling campaign launched	and Wilmslow railway station due to complete 2021. Local Cycling and Walking Infrastructure Plans (LCWIP) for Crewe, Congleton, Macclesfield and Wilmslow have been approved. Emergency Active Travel grants used to implement improved access for cycles in areas of Crewe, Congleton, Macclesfield and Alsager, plus 20mph zones in areas of Wilmslow, Macclesfield, Crewe and Sandbach
												Internal Eco-driving course produced. Literature for the Civil Enforcement Officers to distribute to raise awareness

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GN13/2020	Incentivise parking for low emission vehicles	Traffic Management	Emission based parking or permit charges	2010	2023	CE Environmental Health, CE Parking Services, CE Strategic Transport	None	£100k - £500k	Planning	MEDIUM	Incentivised parking scheme implemented	A parking survey public consultation has taken place in late 2020. After the results have been considered there will be a formal consultation on the final proposals
GN14/2020	Mange the highway network	Traffic Management	Strategic highway improvement s, Re-prioritising road space away from cars, including Access management , Selective vehicle priority, bus priority, high vehicle occupancy lane	2015	2025	DfT, CE Highways	DfT Partially Funded	> £10 million	Implementation	HIGH	SMART Motorway completed. Highway improvement schemes implemented	SMART Motorway opened April 2019. A500 duelling to commence 2022, Poynton Relief Road commenced 2020, expected to open autumn 2022 and the North West Crewe scheme is due to start in 2021
GN15/2020	Weight restrictions in AQMAs	Traffic Management	UTC, Congestion management , traffic reduction	2011	2025	CE Highways	LTP Funded	£10k - 50k	Planning	HIGH	Weight restrictions reviewed and implemented if applicable	The feasibility of a weight restriction in Nantwich has been considered – would only work if high proportion of HGV's using the area.

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GN16/2020	Road markings are maintained	Traffic Management	Other	2011	2022-2023	CE Highways	LTP Funded	£10k - 50k	Implementation	LOW	Relevant road markings are maintained	Further work required. Crewe Arms Roundabout, Edleston Road and Mill Street junctions in Crewe have been completed. A review of the other AQMAS has taken place and the report submitted to Highways
GN17/2020	Encourage taxis licensed by the Council to comply with vehicle emission limits	Promoting Low Emission Transport	Taxi Licensing conditions	2010	2025	CE Licensing	None	< £10k	Planning	It is difficult to quantify reduction of this measure. MEDIUM	Number of taxi's licensed. Number of LEV Taxis in the fleet. All licensed taxis should meet minimum emission standard	Statutory taxi vehicle standards have now been published, will review CE licence conditions. Looking to consult with taxi drivers on their views on greener taxi's

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GN18/2020	Continue to promote and increase the installation of EV charging points	Promoting Low Emission Transport	Procurring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	2014	2022-2023	CE Environmental Health, CE Parking Services, CE Facilities Management	None	< £10k	Planning	It is difficult to quantify reduction as a result of this measure. MEDIUM	Increased installation of EV charging points	EV charging points are conditioned through the planning process. Work has started on a CE EV Strategy
GN19/2020	Support improve ment of public transport facilities	Transport Planning and Infrastructure	Other	2010	2025	CE Strategic Transport	DfT Partially Funded	£1 million - £10 million	Planning	It is difficult to quantify reduction as a result of this measure. MEDIUM	Public transport improved	Successful rural mobility fund bid for trialling on-demand bus services in rural areas. National Bus Strategy now published. Working on establishing Enhanced Partnerships and a Bus Services Improvement Plan
GN20/2020	Provide driver training to operators to reduce emissions	Vehicle Fleet Efficiency	Driver training and ECO driving aids	2010	2022	CE Environmental Health, CE Carbon Neutral Team	None	< £10k	Implementation	It is difficult to quantify reduction as a result of this measure. MEDIUM	Driver training completed	Online training course for CE staff has been produced. Ringway Jacobs have own driving training course and use telematics system to monitor drivers and reward efficiency.

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G21/2020	Support the procurement of greener fleet	Vehicle Fleet Efficiency	Fleet efficiency and recognition schemes	2010	2025	CE Environmental Health, CE Strategic Transport	DfT Pratially Funded	£1 million - £10 million	Implementation	It is difficult to quantify reduction as a result of this measure. MEDIUM	Greener fleet Commitment to be Carbon Neutral by 2025 - target is to reduce emissions from fleet by 30%.	ANSA currently reviewing their Fleet Management System and Driver Training Hydrogen refuelling plant to be installed at Environmental Hub to power two converted refuse collection vehicles with green hydrogen. Review of CE grey fleet, CE fleet and ULEV undertaken. ANSA trialling RCVs with electric bin lifts and replacing E5 standard vehicles with E6. Electric vehicles being used by Highways, Community Wardens and library service
GN22/2020	Support and promote green planting	Other		2014	2025	CE Environmental Health	LTP Funded	£10k - 50k	Planning	LOW	Green infrastructure across the borough	Currently reviewing options with Highways, struggling for suitable

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CONG2/2020	Review the need for traffic signalling and giving more priority to Rood Hill, Congleton	Traffic Management	Strategic highway improvement projects, Re-prioritising road space away from cars, including Access management, Selective vehicle priority, bus priority, high vehicle occupancy lane	2011	2022-2023	CE Highways	LTP Funded	£10k - 50k	Planning	It is difficult to quantify reduction as a result of this measure but implementing this measure will result in reducing traffic queues and as such reduce emissions due to build up. LOW	Traffic signals reviewed	The Link Road opened in April 2021 and we are waiting to review the impact of this. System already uses MOVA
CONG3/2020	Review the need for the pedestrian crossing and the puffin traffic light within close proximity in Lower Heath	Traffic Management	Other	2011	2022-2023	CE Highways	LTP Funded	£10k - 50k	Planning	It is difficult to quantify reduction as a result of this measure but implementing this measure will result in reducing traffic queues and as such reduce emissions due to build up. LOW	Crossings reviewed in Lower Heath area	Highways have said it is very difficult to remove a pelican crossing. May need to look at a temporary deactivation of the pedestrian crossing. Links to Congleton Link Road opening

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CONG4/2020	Review west bound bus stop by Tesco Express (West Road, Congleton)	Traffic Management	Other	2018	2022	CE Strategic Transport	Possible LTP	< £10k	Planning	It is difficult to quantify reduction as a result of this measure but implementing this measure will result in reducing traffic queues and as such reduce emissions due to build up. MEDIUM	Bus stop reviewed	Discussions have taken place and location is being reviewed
CONG5/2020	Work to improve the cycling network around Congleton	Promoting low emission transport	Cycle scheme and network	2010	2021	CE Environmental Health, CE Strategic Transport, CE Public Health	Defra grant, Sustrans, LTP	£10k - 50k	Implementation	MEDIUM	Additional cycling schemes	Looking to spend grant money, agreement of scheme by Defra
Disley Area												
DIS1/2020	Support the improvement of rail facilities in Disley	Transport and Infrastructure	Public transport improvement schemes interchanges stations and services	2011	2022	CE Strategic Transport	LTP, Network Rail Partially Funded	£50k - £100k	Planning	LOW	Rail facilities improved	LTP Delivery Plan considers improved facilities at the station and also increased frequency on the Disley to Manchester route

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DIS2/2020	Investigate the feasibility of implementing a CAZ in Disley	Traffic Management	Other	2015	2019	CE Environmental Health, CE Highways	None	£500k - £1 million	Aborted	N/A as this measure will not be pursued at this time	Feasibility of CAZ/LES investigated and implemented if possible	No current suitable route however working with Greater Manchester with their proposed CAZ and as such this will be looked at further
DIS3/2020	Investigate the feasibility of implementing RUC and/or weight restriction in Disley	Traffic Management	Road User Charging (RUC)/ Congestion charging	2011	2019	CE Environmental Health, CE Highways	None	£100k - £500k	Aborted	N/A as this measure will not be pursued at this time	Feasibility of RUC investigated and implemented if possible	No current suitable route but will review in 2022 if the opportunity arises
DIS4/2020	Review the possibility of a Bypass round Disley	Traffic Management	Strategic highway improvement s, Re-prioritising road space away from cars, including Access management, Selective vehicle priority, bus priority, high vehicle occupancy lane	2011	2022	CE Highways	DfT Funded	£1 million - £10 million	Planning	HIGH	Review completed and Bypass implemented if possible	Bypass was initial recommendation of SEMMMS refresh. Publication of the SEMMMS refresh delayed. Subject to a bypass remaining a priority for SEMMMS refresh it will then be necessary to seek funds to begin design and

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DIS5/2020	Consider green planting along the A6	Other	2020	2025	CE Highways	LTP	£10k - 50k	Planning	LOW	Green infrastructure in place if appropriate	Enquiries are being made with CE Highways to determine feasibility	development stage
DIS6/2020	Review the A6/Market Street traffic lights	Traffic Management	2020	2021	CE Highways	LTP	< £10k	Completed	MEDIUM	Lights reviewed and any changes implemented	AQ hurry call detector installed to smooth traffic from Buxton Road. Complete	
Knutsford Area												
KNUT1/2020	Review the A537 Brook Street / Hollow Lane junction	Traffic Management	2020	2023	CE Highways	LTP	< £10k	Planning	MEDIUM	Junction reviewed and any improvement implemented	None new measure	

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KNUT2/2020	Work to improve the cycling network along the A537	Promoting low emission transport	Cycle scheme and network	2020	2024-2025	CE Environmental Health, CE Strategic Transport, CE Public Health	LTP, Sustrans	£10k - 50k	Planning	LOW It is difficult to quantify reduction as a result of this measure	Cycling improvement	None new measure
Macclesfield Area												
MACC1/2020	Explore the potential of redesigning the A523/Byrons Lane junction in Macclesfield	Traffic Management	Other	2018	2021-2022	CE Highways	LTP Funded	< £10k	Implementation	MEDIUM	Junctions reviewed and any improvements implemented	MOVA has been validated at this junction. Need to install queue loop detector on one of the approaches to reduce queuing in the AQMA
MACC2/2020	Review the Hibel Road / Beech Lane junction	Traffic Management	Strategic highway improvement s, Re-prioritising road space away from cars, including Access management, Selective vehicle priority, bus priority, high priority, high vehicle	2018	2021	CE Highways	LTP Funded	£50k - £100k	Implementation	MEDIUM	Review completed and any actions implemented	MOVA installed at the junction but requires validating

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MIDD3/2020	Review the traffic lights at the junction between Lewin Street and St. Michael Way	Traffic Management	Strategic highway improvement s, Re-prioritising road space away from cars, including Access management, Selective vehicle priority, bus priority, high vehicle occupancy lane	2020	2024	CE Highways	LTP, S106 monies	£50k - £100k	Planning	MEDIUM	Signalling review complete and any actions implemented	None new measure
MIDD4/2020	Construction of a railway station and the return of public trains	Alternatives to private vehicle use	Rail based park & ride	2020	2023 for feasibility review	CE Spatial Planning, CE Strategic Highways	None	£1 million - £10 million	Planning	LOW	Construction of a new railway station with publically accessible trains available	A planning application was scoped for the redevelopment of the Brooks Lane area including the construction of a new railway station. A public consultation exercise was undertaken in Jan 2020. LTP Delivery Plan will look at feasibility
MIDD5/2020	Explore the feasibility of a one way system being	Traffic Management	Strategic highway improvement s, Re-prioritising road space	2020	2025	CE Highways	LTP	< £10k	Planning	MEDIUM	Review of one way system completed	None new measure

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	employed along the section of Lewin Street included within the AQMA								away from cars, including Access management , Selective vehicle priority, bus priority, high vehicle occupancy lane	2020	2023								
MIDD6/2020	Redesign the road layout/priorities along the Chester Road AQMA	Traffic Management							Strategic highway improvement s, Re-prioritising road space away from cars, including Access management , Selective vehicle priority, bus priority, high vehicle occupancy lane	2020	2023	CE Highways	LTP	£10k - 50k	Planning	MEDIUM	Road layout altered	None new measure	
Nantwich Area																			
NANT1/2020	Ensure Peter Destapleigh Way is more attractive to through traffic	Traffic Management							Other	2020	2022 for initial review	CE Highways	LTP	£10k - 50k	Planning	MEDIUM	Increased use by through traffic	Junctions are awaiting Section 278 works which involve the provision of MOVA	

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NANT2/2020	Explore the feasibility of a one way system being employed along the section of Hospital Street included within the AQMA	Traffic Management	Strategic highway improvement s, Re-prioritising road space away from cars, including Access management , Selective vehicle priority, bus priority, high vehicle occupancy lane	2020	2023 for review	CE Highways	LTP	< £10k	Planning	MEDIUM	Feasibility of one way system determined	Following on from the weight restriction feasibility review, this measure was put forward
Sandbach Area												
SAND1/2020	Explore the potential of redesigning the A5022/A534 junction	Traffic Management	Other	2020	2024	CE Highways	LTP	< £10k	Planning	MEDIUM	Junction reviewed and any improvement implemented	None new measure

Appendix A: Response to Consultation

There was a wide range of views and comments and Table A.1 shows the summary of responses to the consultation.

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

Consultee	Category	Response
Air Quality Steering Group	Internal Consultation	Approved
Environment Agency	Statutory Consultation	We welcome the creation of this Action Plan and agree and look forward to working with your authority as noted on page 17. We have no specific comments to make on the action plan at this time.
Highways England	Statutory Consultation	No response
Public Health England	Statutory Consultation	<p>Thank you for the opportunity to comment on the Cheshire East Council Air Quality Action Plan 2020-2025. Air pollution has a significant public health impact in the UK. For example, long term exposure to air pollution affects mortality and morbidity from cardiovascular and respiratory conditions. We fully support the continued work of Local Authorities in seeking to achieve compliance with the UK Air Quality Objectives.</p> <p>For some air pollutants, such as nitrogen dioxide and particulate matter, there is no evidence for a threshold for health effects. Any improvement in air quality, even below air quality standards, is associated with benefits to people's health. PHE strongly supports the continued efforts of the Council to improve air quality in its area and reduce public exposure to air pollution. People's health can be improved if air quality action plans minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure), and maximise health co-benefits (such as by increasing active travel and physical exercise or improving access to and quality of greenspaces). We would encourage consideration of a range of measures to reduce emissions /pollutant levels, together with promotion of more sustainable active transport methods such as walking and cycling that can have wider public health benefits.</p> <p>It remains important to continue monitoring air quality in areas where air quality standards are or could be exceeded and to continue to work to improve air quality in both the AQMA and across the wider local authority area in areas that are not AQMAs. Additionally, the Council may also wish to consider how the effectiveness of action plans will be considered or how the success of the AQMA/action plan will be determined. PHE's review of interventions to improve outdoor air quality and health recommended that evaluation should be embedded in the design of interventions from their outset, to gather evidence of their impact and effectiveness.</p>
Cheshire West and Chester Council	Statutory Consultation	<p>Response:</p> <ul style="list-style-type: none"> • Comments noted <p>No response</p>

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Shropshire Council	Statutory Consultation	No response
Warrington Borough Council	Statutory Consultation	No response
Trafford Council	Statutory Consultation	No response
Manchester City Council	Statutory Consultation	No response
Stockport Metropolitan Borough Council	Statutory Consultation	No response
High Peak Borough Council	Statutory Consultation	No response
Staffordshire Moorlands District Council	Statutory Consultation	No response
Newcastle-under-Lyme Borough Council	Statutory Consultation	No response
Virtual Drop In Session	Public Consultation	<p>Respondent felt Hibel Road presented itself as a good location for green planting.</p> <p>Respondent highlighted the redevelopment of the Kings School site in Macclesfield for the impact on AQ and felt there needed to be monitoring on Cumberland Street.</p> <p>Greater weight needs to be given to the Cycling and Walking Policy.</p> <p>Respondent advised that along the A6 corridor in Disley the various Highway authorities meet up and discuss the area and thought something similar should happen in relation to AQ.</p> <p>Respondent highlighted there is very little EV charging in Disley.</p> <p>Respondents enquired about particulate monitoring.</p> <p>Respondent highlighted that within the Low Emission Strategy there is a priority for cycling and walking and that several planning applications currently go against this Strategy due to their peninsular site layouts.</p>
Congleton Town Council	Public Consultation	<p>Response:</p> <ul style="list-style-type: none"> • GN22/2020 – green planting will be considered at locations across the Borough • Monitoring on Cumberland Street will be reviewed in line with our procedure and Defra guidance • We were unaware of an A6 Highways group and will look to seek involvement from an AQ perspective • GN18/2020 – a Cheshire East EV Strategy is currently being developed • The Council is currently reviewing and assessing several particulate monitors for use in the Borough • GN2/2020 – seeks to implement the LES and ensure the Strategy is considered through Development Management processes <p>Congleton Green Working Group has considered the Cheshire East Council's (CEC) Draft Air Quality Action Plan consultation document and is submitting the following comments. These considerations have been</p>

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approved by Congleton Town Council's (CTC) Community and Environment Committee on the 11th of March 2021.

In writing our response, Congleton Town Council has also considered CTC's Strategic Objectives in its business plan, aspirations in Congleton's draft Neighbourhood Plan and local knowledge of councillors and Green Working Group members on how these relate to the general and specific actions in the consultation.

Congleton is pleased to see that over the past few years the Air Quality Annual Reports are showing continuous improvements in the town's three known Air Quality Management Action areas. However, we are concerned that these areas are only tested for nitrogen dioxide levels and would like to see the areas monitored for particulate matters as these levels do not necessarily decrease in line with nitrogen dioxide levels.

The town council also questions whether averaging NOx measurements over a month gives an accurate picture and really protects the health of residents. This does not comply with WHO standards, which recommend hourly as well as yearly averages. The Town Council understand that hourly measurements are expensive, but we would like Cheshire East Council to consider some real-time measurements at least one day a month at each of the AQMA sites.

We believe testing at peak-times is particularly important for the three AQMA area where the roads are within a few feet of family homes. We are also concerned that next year monitoring of the Rood Hill AQMA area may cease due to meeting the three-year levels criteria. As it is not yet known what the impact of the Link Road, extra house building and measures to encourage through-traffic away from the town centre will have on this area, Congleton Town Council would like to see monitoring continue in the Rood Hill area even if the levels stay below 40 for the third year. Traffic patterns in Congleton are likely to change with the opening of the link road and it is important that this area is kept under review.

We are pleased that CEC is now monitoring Holmes Chapel Road (CE308) and believe it is important for Cheshire East to be proactive in this area of work; not just monitoring the known sites but checking for emissions at other potential hot spots across the borough. In Congleton we are aware of many roads where cars are often queued and where front doors are within feet of the cars. We also suggest spot checks outside schools and shopping centres at times of high pedestrian footfall mixing with parked and often idling cars.

Technology will play a big part in reducing emissions levels and so improving Air Quality and it is a reasonable assumption that there are far more low emission vehicles on the road in 2020 than in 2005. At the same time there has been an increase in the number of cars on the road and although the NOx levels may have fallen the particle levels from brakes and tyres are not necessarily decreasing – which is why we believe these levels need to be checked for the health of our residents.

WHO and EU both recommend strict limits, especially on PM2.5 DEFRA has diluted this to 'work towards reducing emissions.' Given the health danger to the public, we would like to see Cheshire East Council take a proactive approach to particulate monitoring and use a real-time sensor at known hot spots at peak times.

Congleton Town Council noted that the Air Quality Annual Report states that to reduce the NOx levels in Lower Heath would require a 22.23% reduction in traffic. To reduce the levels on West Road would require a 12.5% reduction in traffic. While the soon to be opened Link Road will remove some of the through traffic from these two roads, the Congleton area is increasing by almost 4,000 new houses (increasing housing stock by around a third). We cannot assume that the Link Road will solve the emission problems (Cong 1)

We are also conscious that traffic is not the only source of pollution. Some recent Air Quality monitoring carried out by the Congleton Sustainability Group found that a large proportion of particulate emissions is from house heating (coal and wood) and from industry. The action plan in the document says nothing about non-vehicular

particulate emissions. We believe this is a mistake and even if Cheshire East Council has limited powers over industrial and residential emissions, the problem should not be ignored.

COMMENTS ON GENERAL MEASURES

The consultation document contains 22 General Actions Measures for the Cheshire East Council area. These seem reasonable and but is alarming that some of the campaigns were introduced a decade ago and suggest that more urgency is needed. Where it is possible to work in partnership the Town Council would consider helping to promote these general measures – particularly the 7 General measures below:

GN8 School Travel Plans – more energy is needed in this area and a more target campaign to stop mixing idling cars and young children at the start and end of the school day.

GN9 – Encouraging Company Travel Plans – CTC would be happy to assist CEC with this project in the Congleton Area.

GN11 – Active Travel – this action should also consider the role of walking and public transport. As part of Active Travel CTC is keen to see more priority crossings and safer routes to school.

GN12 – Anti Idling – CTC would be happy to work with CEC on promoting this message and to work with the schools (encourage CEC to get children to learn how to test as part of science lessons?)

GN15 – Weight Restrictions on AQMA areas – this wouldn't work for Congleton as the AQMAs are along main routes in and through the town

GN18 – More electric charging points – CTC would like to see the proposals for more points in Congleton. Approximately three years ago we were fighting to keep our charging points in Princess Street car park! CTC believes it is important to develop a plan for more public fast charge sites

GN22 – Encouraging Roadside Planting – CTC is interested in working with CEC to increase this general measure. Through Congleton in Bloom, Streetscape, Congleton Town Council and Congleton Partnership there has already been some progress. It has been area that members of the public are keen to get involved with. We would be interested in seeing Cheshire East's Plans for Congleton and working in partnership on this general action.

Please can you supply Congleton Town Council with more information on the dismissed GN9 action on page 31 not pursuing the NOx busting paint – on hold for further research as we understood this to be used on Rood Hill wall.

FIVE CONGLETON SPECIFIC ACTIONS MENTIONED IN THE ACTION PLAN

Congleton Town Council questions whether all of the five specific actions listed for Congleton are in line with other Cheshire East Council policy documents such as the Active Transport Plan Development Plan. The actions appear to have been developed with the idea of keeping vehicles moving to reduce pollution – but the actions proposed may be detrimental for walking, cycling and public transport - moving bus stops so that vehicles do not get stuck behind buses, reviewing pedestrian crossings to that vehicles do not have to stop as often, reviewing the need for lights at Rood Hill.

Cong 1 –building the link road, to remove much of the non-local traffic from the town centre roads Although we all hope that the Link Road has the desired effect of removing much of the through traffic along West Road, Clayton Bypass and Lower Heath, the housing built within the Link Road area is likely to create more local traffic, so the impact of this action will need to be kept under review.

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		<p>Cong 2 Review need for Traffic Signals at Rood Hill and give more priority to Rood Hill - need to also be conscious here that in another consultation the aim is to direct more traffic up Rood Hill rather than through the town centre so this needs to be taken into account with the lights, along with enabling people to physically cross the road.</p> <p>Cong 3 – Review the crossing at Lower Heath – Puffin and lights. We would be concerned about seeing any pedestrian crossings removed and believe we need MORE safe crossing points if more people are going to be persuaded to walk or cycle for local journeys. Removing the crossing could affect the walking route to school.</p> <p>Cong 4 – Review West Bound Bus Stop by Tesco express – if public transport is going to be successful the buses need to stop where people want to get on and off.</p> <p>Cong 5 – Improve Cycle network around Congleton – Congleton Town Council are in support of this.</p> <p>We would welcome feedback on our comments. As a Town Council we are as concerned about the importance of good air quality for our residents and would welcome an active conversation on how we can work together to achieve this in Congleton.</p> <p>Response:</p> <ul style="list-style-type: none"> • Comments noted • The Council is currently reviewing and assessing several particulate monitors for use in the Borough • Monitoring is undertaken as an annual average in accordance with Defra guidance • GN5/2020 does look to regulate permitted industrial processes and with regards to residential emissions, this is being picked up by various initiatives on a national level and the Council will support these where possible • In terms of GN11 and GN12, the Council is keen to work with all external partners, and welcomes the engagement • GN18 – a Cheshire East EV Strategy is currently being developed
<p>Disley Parish Council</p>	<p>Public Consultation</p>	<p>Disley Parish Council's commentson the Cheshire East Borough Council Air Quality Action Plan (AQAP) 2020-25 are as follows:</p> <p>Despite Disley being an Air Quality Management Area (AQMA), approval for the A555 was given with the knowledge that air quality along the A6 through Disley would likely deteriorate following the projected increase in trafficfollowing theopeningof this road.This predication has been proven, particularly by the significant increase in LGVs and HGVs. Disley Parish Council (DPC) anticipated that the Cheshire East AQAP would recognise this situation, alongside the increased concerns and issues faced by residents and commuters and would address these with innovative plans which could be actioned as soon as possible. The AQAPoutlines general aims that are difficult to disagree with including Para 3.3 -measures to reduce the impact of LGVs & HGVs should be implemented in the AQMAs to help improve air quality. Key priorities in Para 3.5 such as traffic management, alternative travel, low emission transportation and green infrastructure are also verypositive,but these measures and priorities must be implementedand concrete timeframes supplied.</p> <p>General Action Plan Measures:</p>

<p>GN4/2020-allocates no funds yet recommends air quality impact assessments to be in accordance with EPUK guidance and recommends mitigation.</p>	
<p>GN15/2020-weight restrictions in AQMAs -policy is HIGH yet nothing specific is committed for Disley and Newtown.</p>	
<p>GN18/2020-continue to promote and increase installation of EV charging points. DPC supports this action, has contacted CEC, and looks forward to further communication and confirmation of implementation as soon as possible.</p>	
<p>DIS1/2020-DPC support improvements to rail facilities in Disley. However, DPC is disappointed to learn that a recent public consultation by Manchester Recovery Task Force proposes 3 options and Option A is to reduce the frequency of trains on the Buxton line to one per hour. DPC would be grateful if CEC could confirm its position on this proposal and its support for either Option B or Option C. A reduction in trains will lead to a direct increase in car usage.</p>	
<p>Like Cheshire East Council, DPC is a member of the Community Rail Partnership (CRP) and notes that CEC makes a financial contribution to the CRP. The Friends of Disley Station (FODS) have established a good working relationship with Network Rail via the CRP and urge CEC to send a representative to future CRP meetings. This would enable CEC to understand local concerns about services and facilities and inform its actions to improve public transport and keep abreast of regular proposals for changes to transport. CEC emphasises the importance of improving public transport and DPC wishes to encourage the increased use of rail freight as a means of reducing the number of HGVs on the A6.</p>	
<p>DIS2/2020-relates to a clean air zone. DPC supports this proposal but is disappointed that it will not be considered until an undetermined future date.</p>	
<p>DIS3/2020-relates to implementing RUC and/or weight restriction, again this will not be considered until an undetermined future date.</p>	
<p>DIS4/2020-DPC notes that the review of a bypass is on hold until the outcome of the SEMMMS refresh study.</p>	
<p>DIS5/2020-considering green planting is supported by DPC but is disappointed that this will not be considered until 2022/2023.</p>	
<p>DIS6/2020-review A6/Market Street traffic lights. DPC supports this action to stop excessive vehicle idling. DPC would be grateful if CEC could also consider the inclusion of reference to the designation of specific truck routes to take HGVs away from the A6 and the centre of the village and the introduction of local cycle routes and air monitoring for particulates in the AQAP.</p>	
<p>Local concerns have been raised about air quality in Newtown, as due to increased traffic numbers there are regularly queues of vehicles at the New Mills traffic lights. This situation has been exacerbated by the repositioning, by Cheshire East Highways, of a bus stop without reference to the air quality impact. DPC believes that air quality monitoring should be introduced in this area to establish the size of the air quality problem. DPC understands that CEC can only plan to effectively tackle air quality issues within the Council's control and continue to work with regional and central government on policies and issues beyond their direct influence. However, DPC anticipates that traffic numbers and air pollution levels will substantially increase as lockdown restrictions are lifted and requests that CEC considers bringing forward all specific plans with actions in the AQAP to be completed as soon as possible.</p>	

		<p>DPC is encouraged to learn that going forward CEC will be working with SMBC to refresh the A6 Corridor Study in order to recommend a more strategic approach to addressing local issues and DPC looks forward to contributing to this study. However, DPC would welcome the inclusion of High Peak Borough Council in these discussions as many of the issues contributing to air quality issues are of cross-border concern.</p> <p>Response:</p> <ul style="list-style-type: none"> • Comments noted • One of main purposes of the consultation was for consultees to propose any innovative measures to help improve air quality • GN18/2020 – a Cheshire East EV Strategy is currently being developed • DIS1/2020 – the air quality team was unaware of the recent consultation and would welcome any links to the Community Rail Partnership • DIS2/2020 – we are currently working with Greater Manchester on their proposed Clean Air Zone and as such it is necessary to assess the impact of this first and the impact on Disley • The Council is currently renewing the monitoring station and consideration is being given to include a particulate monitor • With regards to HGVs it is felt it would be advisable to await the outcome of the Greater Manchester Clean Air Zone to see if this reduces the number of HGVs travelling through Disley • Monitoring of the areas of Newtown within the Borough will be reviewed in line with our procedure and Defra guidance • With regards to working with neighbouring authorities the Council will approach High Peak to explore any potential options for joint working
<p>Middlewich Town Council</p>	<p>Public Consultation</p>	<p>The Air Quality Action Plan is between 2020 and 2025. However what process have been put in place to consider potential outcomes the UK Government Policy Paper; 25 Year Environmental Bill (current version 220 2019-21 (as amended in Committee)) now in report stage are aligned in the plan.</p> <p>Does the plan consider that more effective monitoring of NO2 and Particulate Matter needs to be in place to ensure suitable and sufficient monitoring to establish accurate base line figures for the previous mentioned? If there is to be a reduction in any targets, particularly PM2.5, how will this be achieved rather than having to use bias correction and modelling.</p> <p>What consideration in the plan, and previous plans, to reduce the traffic congestion in Middlewich. How does the modelling method account or discount additional traffic coming from the west of the town and the additional traffic loading (and consequential effects of additional housing developments). How does the factors of potential 40% car ownership in Cheshire East, and the developments around Warmingham Lane et al, the potential of increased NO2 and PM, be reduced by the by-pass if those developments increase traffic loading through Middlewich?</p> <p>Does the plan consider that all areas of poor air quality, for example Middlewich, are established? It has been identified within Middlewich there are additional pinch points that have the potential to add to the boundaries of the Air Quality Management Areas (AQMA's). There are identified two AQMA's in Middlewich, Lewin Street and Chester Road, and with reason there should be a definitive plan to reduce poor air quality in those areas.</p>

	<p>However the plan advises a time period of four years. Should the plan not reflect a shorter timescale. Should the plan consider an approach to reviewing traffic loading by heavy goods vehicles and alternative routes.</p> <p>The plan advises of the process to ensure consistent monitoring of air quality in Middlewich. However there has on occasions missing diffusion tubes, which there may be reasons for that. However, Middlewich Council was made aware due to the Covid 19 restrictions that tubes were removed due to lack of tubes from the laboratory. Does the plan, or should the plan however have in place resilience to ensure that this should not occur. Near the end of the first lockdown the amount of waste vehicles 'catching up' was noted, however there were no tubes in place.</p> <p>Does the plan have in place a system to identify the possible removal of tubes, and communicate those concerned the reasons for?</p> <p>With the additional housing developments within Middlewich, what considerations have been applied in the plan to reducing the NO2 and PM levels in the Town. Although the CEC has carried out 'modelling' of the effects of the by-pass which alludes to a drop of 2.34ug/m2, what methods were utilised in the modelling. CEC has one of the highest two car ownerships, the basis that the by-pass will reduce the NO2 and PM levels does not seem logical. When has the traffic modelling taken place and what considerations that traffic loading from the Winsford and Northwich area to utilise the by-pass will not affect the NO2 and PM levels</p> <p>How will the plan ensure up to date reporting on the following?</p> <ul style="list-style-type: none">• Health Profiles for Electoral Wards plus Primary Health and Social Care Areas• Public Health Outcomes Framework. <p>The above are critical in establishing and monitoring the effectiveness of air quality initiatives against health issues</p> <p>The plan we believe should and must be part of CEC alignment to being Carbon Neutral. How does the plan envisage that achievement when there is a concern of the methodology and monitoring of air quality in Middlewich?</p> <p>Does the plan cover the issue of fugitive emissions from waste facilities? Over a period, there have been resident concerns regarding these emissions, brought to a head with the failure of the filtration system at the waste facilities. Other than the original waste facilities planning application, and the numerous residents' complaints, how does the plan ensure the remit of M9 – Environmental monitoring of bioaerosols at regulated facilities, that there is no affect to resident's health. Does the plan ensure other gasses, particulates and bioaerosols are monitored both effectively and transparently? There are other generators of poor air quality, for example wood burning. What processes of monitoring should be in the plan to identify fugitive emissions and other sources that affect air quality.</p> <p>To achieve a Carbon neutral environment there needs to be changes now. ANSA has taken a positive step forward with the trail of hydrogen powered vehicles and seeking planning permission for the installation of solar panels. However, a fundamental review of bus transportation, routes and timetable should be considered. Will or does the plan support this, and how?</p> <p>Will the transport plan review support for the reopening of Middlewich Train Station? There is a draft report in circulation which needs to be reviewed and the plan should support this. The report sets at the back of the document however places a long date schedule for this, which needs to be prioritised for the benefit of the town.</p>
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		<p>Response:</p> <ul style="list-style-type: none"> • Comments noted • With regards to areas in the Borough that are not AQMAs, the proposed general measures would be applied where possible • With regards to the supply of tubes from the laboratory, as you can appreciate, this was a national issue due to the global pandemic. Unfortunately due to the expiry date of the tubes it is not possible to hold a surplus stock of tubes to cover such situations • The removal of monitoring tubes is undertaken in accordance with the Council's approved procedure • The 2.34ug/m² figure has been calculated using information available from Planning. Any modelling is undertaken in accordance with Defra guidance • Reporting on the Public Health Outcomes Framework is undertaken through the Annual Status Report • The Action Plan is specifically aimed at improving specific air pollutants as set out in the regulations, and although there is a lot of crossover with carbon neutrality, the two plans do need to be separate • With regards to fugitive emissions from the waste facility this would be covered by the Environment Agency as regulators of the site
<p>Poynton Town Council</p>	<p>Public Consultation</p>	<p>The Planning & Environment Committee at Poynton Town Council have asked me to write to you to provide the following comments on the Cheshire East Air Quality Consultation.</p> <ol style="list-style-type: none"> 1. The Committee feels it is the wrong time for this Consultation to be carried out. We are in the middle of a National Lockdown due to the ongoing Pandemic and since March 2020 there have been many fewer cars on the road as a result. It is felt that due to this fact the recent air pollution figures will not be a true reflection of normal (outside lockdown) levels. It is likely that traffic, and hence air pollution, will increase rapidly once the lockdown ends. This effect is particularly strong in Poynton and other areas in the north of Cheshire East, where many people commute by car into Greater Manchester for work. 2. The whole policy seems at odds with the fact that Cheshire East is still allowing large new housing developments on the outskirts of towns to be built, resulting in more cars on the road as residents will be required to commute to schools, shops and workplaces. 3. In conclusion, Poynton Town Council believe that any decisions on Air Quality should be deferred until after the lockdown has ended and traffic returned to normal levels. The issue of Air Quality should preclude further developments in the Green Belt bordering towns and large villages. <p>Response:</p> <ul style="list-style-type: none"> • This is a copy of the response sent back to the consultee - The Action Plan is not affected by monitoring data, it purely details measures that it is hoped will improve air quality in specific areas and also generally across the Borough. We are bound by legislation to have an Action Plan in place once we declare an Air Quality Management Area (AQMA) and we have a timeframe of which to do this in. As we declared two new AQMAs in November 2019 we have a statutory duty to include these two areas in our Action Plan, hence the timing of the consultation.

<p>Sandbach Town Council</p>	<p>Public consultation</p>	<p>Please find below the Air Quality Action Plan Consultation response from Sandbach Town Council: STC considers that there are three key areas within Sandbach that require monitoring and mitigation implemented.</p> <ol style="list-style-type: none"> 1) Middlewich ByPass <p>No traffic modelling work appear to have been undertaken, STC are very concerned that once the bypass opens traffic volumes will be increased through Sandbach via the Middlewich Road travelling to the industrial areas of Middlewich. This is likely to impact the town centre around the Ashfields/Middlewich Road junction where the AQMA has been revoked, together with Hind Heath Road and Old Mill Road leading to J17 of the M6.</p> <ol style="list-style-type: none"> 2) Brickhouse Farm junction <p>SAND1/2020 Explore the potential of redesigning the A52022/A534 junction in Sandbach Traffic Management CE Highways LTP Junction reviewed and any improvements implemented, new measure 2021-2022 for review, implementation of any suitable measures as appropriate. STC has seen the recent proposals within the latest Capricorn planning application and were most concerned at the impractical design proposed for this junction – putting pedestrians and cyclists at high risk of injury, and requiring much traffic to double back on itself around a new roundabout that was highly likely to damage Grade II list buildings at the junction.</p> <ol style="list-style-type: none"> 3) Middlewich Road/Ashfields <p>SAND1 Traffic Management Review flows and priorities at Ashfield Way, Sandbach Completed: Modelling work has been undertaken and the outcome will be implemented by CE Highways in early 2021. STC is yet to see the outcome of this review.</p> <p>MIDD1 & SAND2 Freight and Delivery Management Vehicle weight restriction No alternative routes currently available. This was a scheme to divert HGV's away from the AQMA – nothing has been done, STC must ensure that pollution levels continue to be monitored at this key congestion point within the town centre.</p> <p>Conclusion</p> <p>STC acknowledge that CEC air quality monitoring is now more open and transparent. But residents need to be reassured that our air quality around the congested roads of Sandbach are appropriately monitored and air quality improvements designed and implemented. The as yet unassessed impact of both the major road schemes in Middlewich and Congleton need to be monitored and mitigation measures implemented.</p> <p>Response:</p> <ol style="list-style-type: none"> 1. Although the AQMA has been revoked, monitoring will continue in the area and as such we will be able to assess any impact of the opening of the bypass 2. Air quality comments are provided on any proposed new or significantly altered road layout 3. Although the AQMA has been revoked, monitoring will continue in the area
<p>Member of the public – Congleton area</p>	<p>Public consultation</p>	<p>I am pleased that there is an attempt to improve air quality, and the introductory blurb is impressive. However my main concern is that the action plan does not match the bullet points of holistic/integrated actions. Instead it seems to have an action plan of disjointed projects with low priority for some of those aims, and the business-as-usual priority of keeping motorised traffic flowing in high traffic areas, to the detriment of people on foot, bicycles, and buses.</p>

It is depressing that there is no joined-up thinking with other CE policies and national government aims. The actions tabulated in this draft document fly in the face of CE's declaration of a climate emergency requiring reduced CO2 production, the Institute of Civil Engineers briefing sheet on street design (attached) and CE's recent Low Emission Strategy that clearly states a policy of reducing demand for travel by private vehicle, incorporating high quality facilities for pedestrians, cycling and public transport, and also restricting car parking spaces and requiring 20mph within new developments.

The answer to poor air quality from vehicle emissions is to reduce the number of vehicles, particularly private ones. So a concerted effort would need to see an action plan to make it much easier and more attractive to walk, cycle or use the bus/train than jump in a private car. Instead, your draft action plan seems to be to build more roads or increase their capacity, shift pollution from one place to another (e.g. the nearly built Congleton link rd), and remove things that slow or stop motorised vehicles from progressing, thus encouraging journeys and increasing vehicular traffic and consequently failing to improve air quality, whether it be NOx, particulate matter or microplastics, and failing to reduce transport's carbon footprint. You are chasing your tail with this! You have been accommodating increases in vehicular traffic for years, which means vehicular traffic has increased. It is a vicious circle - provide more roads, faster roads, wider roads and vehicles will use them. To decrease vehicular traffic, studies have shown success by closing roads to through traffic, incorporating impediments to speed (traffic lights, pedestrian crossings, speed limits). People just stop making the journey, or use an alternative method of travel.

It is ridiculous to continue to try to accommodate more private car use by providing more roads and lanes, which only serves to encourage more. It is also ridiculous to rely on swapping from fossil fuels to (renewable?) electricity without addressing the fundamental problem of overdependence on private car use. Even when private cars are not being driven, they are causing a problem of kerb-side (and pavement) parking - obstructing the highway for emergency and essential vehicles, and non-motorised users. The root of congestion and air quality problems is too many vehicles on the road, and private car users should not be catered for at the expense of other highway users, and everyone's health.

Many of the actions are labelled as LOW or MEDIUM impact, despite there being studies showing higher impact. For example: Cycle lanes=low impact/hard to measure. No, it's easy to measure motorised use of a highway before and after a cycle lane. Just look at all the Covid emergency measures across the country where cycling has been taken up once safer provision has been put in place. When cycle journeys replace car journeys, this improves air quality. A well designed comprehensive cycle lane network will attract more cycling because people feel safer. This will reduce private car use, so improve bus reliability, which will make bus travel more attractive. All resulting in better air quality.

It is appalling that you want to remove pedestrian crossings because they create traffic queues. This is a very outdated attitude, prioritising vehicle traffic flow over other 'traffic' flow. People on foot and cycles are also considered traffic these days. What happened to other CE strategies and policies for active travel to take priority? How do we cross roads without pedestrian crossings? Let the cars queue! It's a deterrent to car use. It is also a huge misconception that slow or stationary cars produce more pollution than fast moving cars. Fuel in-pollution out. So slower vehicles use less fuel than faster vehicles and therefore produce less pollution - you are mistaking dispersion for reduction. Traffic queues make the pollution really obvious, because moving traffic creates a slipstream that stirs up the air. The pollution is still there damaging us and the planet, the high carbon footprint is still there, the PM10s from tyres are still there.

You could make a huge difference to air quality by not catering for private car use and by actively deterring this. Re-allocate the highway budget. Keep a proportion for essential repairs/maintenance only. Re-allocate

<p>Member of the public – Congleton area</p>		<p>the rest to give residents a genuine choice of walking or cycling or using the bus (or a mix of these) to travel around. This spending would have a huge impact on air quality. The only infrastructure changes should be for wider pavements, more pedestrian crossings, improved junctions to make them safer to cross on foot (eg removing wide radius junctions that result in a lot of road to cross on foot, and allow drivers to sweep around without slowing) or bicycle, provide many more angled kerbs that help people with wheelchairs, pushchairs, limited mobility access/cross roads. Use angled kerbs instead of traditional dropped kerbs to sloping pavements - these undulating cambered surfaces are hard to walk or wheel along.</p> <p>We cannot just carry on as before - please be innovative, learn from other towns (and countries) where they have improved not just air quality but quality of life by providing people with genuine choice of travel. Parents would let their children walk or cycle to school if the road network was safer, more pleasant and less polluted. Instead they drive and add to the problem for all the non-motorised traffic. Madness.</p> <p>Please revise this draft to have a real impact.</p> <p>Response:</p> <ul style="list-style-type: none"> • Comments noted • With regards to improving cycling and walking this is reflected in the plan, particularly GN11/2020 and GN19/2020 and the Council will work to encourage this where possible
<p>Member of the public – Congleton area</p>	<p>Public Consultation</p>	<p>I thought the Plan was sensible but I am concerned that the air quality on Back Lane, Congleton is not monitored. That road contains two industrial estates generating journeys by heavy goods vehicles and vans and also contains a large amount of residential housing. When more housing was being planned on land next to a specialist HGV repair centre, I raised the question of air contamination only to be told that it was not applicable because the air quality in that area was not monitored. So how do the planners know that there is not a problem? Surely there should be mobile monitoring equipment that is moved around to check for problems?</p> <p>The only other thing that concerned me was the suggestion that the crossing on Lower Heath Road be removed. That crossing is much used by school children from Eaton Bank Academy to cross a dangerously busy main road.</p> <p>Response:</p> <ul style="list-style-type: none"> • All planning applications for new development are assessed by the team for their impact on air quality • Monitoring on Back Lane will be reviewed in line with our procedure and Defra guidance • With regards to the crossing at Lower Heath, there are two crossings in very close proximity and a review is proposed to ensure they are both required
<p>Member of the public – Disley area</p>	<p>Public Consultation</p>	<p>On a positive note despite all the pressures existing on public services, you have provided a document for consultation. This is following a campaign in October to "Show the air you care". You have acknowledged that you need to work with regional and central government on policies and issues beyond your direct influence and provided monitoring information from the diffusional tubes for 2020 on the website. The interaction between this plan and other strategies in the authority is acknowledged and the need to develop a Cheshire East health impact assessment which will show how the plan impacts on the health and well being of those living and working in the area. You also acknowledge that you only monitor NO2 and that Disley has the only automatic</p>

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		<p>monitoring system in the authority. This machine is intended to give information to "highlight where efforts need to be targeted" You explain that particulates are not currently monitored but suggest that this plan by focussing on NO2 would significantly and positively help in the reduction of PM as "vehicular emissions from road transport is our dominant source of air pollution within the borough". You acknowledge that work is needed to implement the demands from the Clear Air Policy and that a village bypass may be a long term option both of which involve negotiations with neighbouring authorities.</p> <p>I recently responded to the transport plan which had particular sections for Poynton which included Disley. I can only realistically respond as a Disley resident to the air quality management areas. I agree with the reference to health issues and health inequalities and measuring particulates and getting specific health impact assessments completed and with action plans. I suggest health and wellbeing should be included in the priorities for the plan. I understand you are waiting for the SEMMS refresh plan. As regards the speed limit on the A6 and the Police refusal to reduce the stretches of 40mph to 30 mph, are you collecting evidence to submit a challenge to this? I do not have any figures, but I know from personal knowledge there has been one fatal accident recently on Lyme bends and there is currently evidence of a wall demolished close to the Newtown/ Disley border. There is a need to increase the number of speed monitors to ensure they are equipped for the task required of them. There has been some recent work at junction of Buxton Road with Jacksons Edge Road and Buxton Old Road which is intended to smooth traffic along Buxton Road. Even now, when its essential travel only there can be congestion, so I expect this to be monitored to ensure it achieves its aim or whether more adjustments are necessary.</p> <p>The 2020 NO2 figures compared to those for 2019 show the effects of the lockdowns but with averages albeit draft still at 43.05 and 44.54 and 31.19 and 38.58.taken from the diffusion tubes there is clearly much more that needs to be done to improve the situation. The purchase and provision of systems to monitor particulates will assist in the overall task.</p> <p>I am not aware of all the different priorities facing you from a Cheshire East perspective, but so far as Disley is concerned the time has come for you to provide a final plan which identifies time scales to achieve the actions by, who is going to be involved, how much it will cost and where this funding will come from. I hope that by having the consultation you will receive ideas.to help take things forward.</p> <p>Response:</p> <ul style="list-style-type: none"> • Comments noted • The comments about speed we will look to see what data is already available and this may form a later action, depending on the outcome. • Jacksons Edge Road – this junction is situated very close to our monitoring station and the impact of this work will be reviewed over the coming months • The Council is currently renewing the monitoring station and consideration is being given to include a particulate monitor
<p>Member of the public – Disley area</p>	<p>Public Consultation</p>	<p>I think overall there is a need for great emphasis on co-ordinated action across different sectors. Here are particular examples that effect Disley in the north east of Cheshire East (and elsewhere)</p>

		<p>While emissions should decrease as electric and hydrogen increase in use this will not change tyre and braking particles etc – there needs to be an emphasis on planning on smooth rolling traffic to stop acceleration, braking and idling</p> <p>This is particularly true through High Lane, Disley and Newtown through to Furnace Vale (spanning 3 councils which need to work together) – sadly this means the need for a bypass for heavy traffic to limit pollution in the village centres and prevent the added (and needless) pollution from braking, accelerating and idling through a sequence of traffic lights</p> <p>I am sure this is true elsewhere</p> <p>Many homes still use gas (or solid fuels) and there needs to be increased bias to allow micro-generation and source pumps – this needs to avoid a postcode lottery of permission – so there needs to be a bias for this in conservation areas and for listed buildings (though they should be sensitive to the history they should not stop the need for a eco-economy)</p> <p>Which is obviously of need for the village of Disley – a conservation area – along with other areas. Finding ways for conservation areas to also be eco-areas (if not leading eco-areas) will be important across Cheshire East</p> <p>Response:</p> <ul style="list-style-type: none"> • With regards to working with neighbouring authorities the Council continues to work with the Greater Manchester with the introduction of the Clean Air Zone and will approach High Peak to explore any potential options for joint working • With regards to the heating of homes this is being picked up by various initiatives on a national level and the Council will support these where possible
<p>Member of the public – Disley area</p>	<p>Public Consultation</p>	<p>Please find my responses to those contents of the above plan which specifically relate to Disley.</p> <p>Dis. 2/2020 – raises the potential of implementing a Clean Air Zone (CAZ) in Disley. What then follows are various reasons why a conclusion is drawn that there is no suitable route available and the issue is kicked into the long grass by suggesting it might be considered in the future (presumably after 2025) but dependent on Manchester CAZ progress. To me this is a complete cop out and the issue has been raised as another tick box exercise reflecting CEC's complete lack of imagination on how they might influence the continued appalling and illegal air quality in the centre of Disley.</p> <p>Dis.3/2020 – raises the prospect of another futuristic solution, this time Road User Charging. The conclusion is identical to 2/2020, that there is no suitable route and another item heads into the long grass !</p> <p>Dis. 4/2020 This raises the age old issue of the much vaunted Disley Bypass. If all of the words written on this subject since the mid 80s were connected I am sure they would exceed the mileage that the road would cover ! What is this plan's conclusion ? on hold until the outcome of the SEMMS refresh study – whatever that is. Even this appears contrary to what is contained in Cheshire East's very own Local Transport Delivery Plan 2019 – 2024. That document states that in the period of that plan all that is intended is to do is " raise the understanding of the feasibility of a potential route " in the period between 2019-24 . On this basis and with strong favourable conditions a bypass could not be achieved during the ensuing 25 years ! No mention of SEMMS refresh study ! We appear to have disconnects between Cheshire East's various plans on the matter. Is there any wonder why we have so much difficulty in taking them seriously ?</p>

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		<p>Dis.5/2020 I question if anyone in Cheshire East has ever visited Disley if they think the A6, post Phase 1 Mitigation, is going to provide a basis for Green Planting along its length to the point where it is going to have a positive influence on Air Quality. I find it really difficult to take this seriously and I think the only greenery this one is going to see is the long grass once it has been kicked into it.</p> <p>Dis.6/2020 Cheshire East certainly have the capability of implementing this and it would be welcomed but I feel it is delusional to think this is going to have any significant impact on the overall Air Quality along the A6 in Disley.</p> <p>FURTHER COMMENTS : There is no mention whatsoever of one of the major contributors to poor Air Quality in Disley i.e. the inordinate levels of HGV traffic passing through the village. This leaves me wondering if the authors of this report have any understanding whatsoever of the problems the village has been experiencing for many years. I and other residents have asked for Particulate Matter, closely associated with HGV emissions, to be measured at various points along the A6. Those requests have been rejected on a variety of "can't do" bureaucratic reasons. One can only conclude that The Council are fearful of the results this would throw up.</p> <p>I have also raised the issue of why the NO2 monthly results recorded by the diffusion tubes are no longer published. We are aware that the monthly results are not definitive when it comes to the final annual result and further sensitivity work has to be undertaken . However, in the past, a number of residents have found them extremely useful as patterns and trends become evident.</p> <p>Finally I would like to know how closely the plan has been developed with input from local MPs. Mr Rutley has assured me that he is fully aware of the traffic problems, including poor Air Quality, we face in Disley and along the A6 and has informed me that he and two other local MPs have been working hard on addressing these issues with the various LAs. I find no evidence to suggest that their efforts are reflected in either CEC's Local Transport Delivery Plan or their Air Quality Action Plan.</p> <p>Response:</p> <ul style="list-style-type: none"> • Comments noted • HGVs will be considered in several general measures in the Action Plan i.e. GN14/2020 and GN15/2020 • Raw monthly monitoring data can be found on our website, as can the data for the previous years • In regards to developing the plan consultation was highlighted through all relevant social media channels including our website and all relevant public bodies i.e. Town and Parish Councils, Borough Councillors
<p>Member of the public – Disley area</p>	<p>Public Consultation</p>	<p>Please can you look carefully at the Plan as it affects Disley.</p> <p>The state of air quality there is rather frightening. It is doubly scary when it's one of those low cloudy mornings on the A6 in the valley and all the children are being taken to school in diesels and the heavy diesel lorries are jamming up the roads and the pollution hangs like a bad smelling cloud. I'm worried about the long-term effects on their lungs. We really should be acting urgently on this in this village.</p> <p>Response:</p> <ul style="list-style-type: none"> • Comments noted

<p>Member of the public – Disley area</p>	<p>Public Consultation</p>	<p>I have recently been sent a link to your draft Air Quality Action Plan. I note that the consultation closes on 12 March. I am disappointed that the consultation was not better signposted or disseminated to the public. Also, whilst I have found and read the document, it is by no means easy to follow nor is it easy to respond to. I would suggest that a simple consultation document would have been more effective than asking for an e-mail. I would like to restrict my comments to the Disley situation. The readings on Market Street, Disley are scandalous and show a huge health risk to anyone using those streets or living nearby. I myself, sometimes use the shops there and the co-location of the local primary schools to the main road pose an urgent dilemma. The reductions in pollutants require urgent action. The SEMMS refresh is important but the plan needs to make clear what actions will be taken to tackle the health risks if the by-pass is not agreed and urgently progressed.</p> <p>Response:</p> <ul style="list-style-type: none"> • Comments noted • In regards to public awareness the consultation was highlighted through all relevant social media channels including our website and all relevant public bodies i.e. Town and Parish Councils, Borough Councillors
<p>Member of the public – Middlewich area</p>	<p>Public Consultation</p>	<p>Air Quality Action Plan 2020-2025 in relation to Middlewich.</p> <p>Measurements of Nitrogen Dioxide (NO2) & Particulate Matter (PM) within AQMAs,</p> <p>I believe NO2 is measured by "Diffusion Tubes" and PM is not monitored within the two Middlewich AQMAs. Measurement of NO2 by these tubes is not precise and it is not made clear how PM is measured, calculated or approximated. If this carried out by modelling how often is this method reviewed?</p> <p>Why are Particulates measurement instruments not used?</p> <p>What are CECs plans to investigate and potentially monitor other areas of Middlewich for example Wheelock Street and Hightown?</p> <p>Promoting Low Emission Transport</p> <p>Why aren't there any measures in the Action Plan regarding cycling schemes within the Middlewich area, as there are for Congleton and Knutsford?</p> <p>Due to the poor state of the road surfaces in Middlewich there isn't any encouragement to use a bicycle, residents could be persuaded to cycle locally rather than use their vehicles if a cycle network were to be created.</p> <p>Measure No.</p> <p>MIDD1/2020 Eastern Bypass</p> <p>This measure claims to reduce emissions across Middlewich Town by approximately 2.34ug/m2, how is this calculated and has proposed new housing developments been taken into these calculations i.e., the 404 dwelling Glebe farm development?</p> <p>MIDD02/2020 Southern Bypass</p>

<p>This is fine idea but as this would have no impact on the Air Quality within Middlewich Town during the period of this plan (2020 to 2025) I feel there isn't a need for it to be included</p> <p>MIDD03 /2020 Lewin Street/Kinderton Street traffic lights</p> <p>The congestion at these traffic lights needs to be addressed as traffic backs up along Lewin Street into the AQMA. These vehicles with idling engines are adding to the emissions when we should be reducing them. The traffic on A54 backs up Holmes Chapel Road to the Pochin Way roundabout and beyond, also creating queuing traffic on King Street. The opening of the eastern bypass may ease this but a large majority of this traffic is through traffic to Winsford via the Chester Road AQMA and the A530 to Wimbolsley and beyond.</p> <p>The proposed Glebe Farm housing development will also increase the use of this junction. This development with 404 dwellings, an average of 1.3 vehicles per household, that's a possible 525 additional vehicle movements within Middlewich. That's 228 grams of additional CO2 per mile per vehicle (2018 DoT figures).</p> <p>MIDD04/2020</p> <p>To encourage the residents of Middlewich to return to public transport, Cheshire East council should be fully supporting the reintroduction of a railway station, giving public access to local train travel. This should also be considered as a feeder line to Crewe to support the HS2 phase2A now it has been given Royal Assent. This should be more than just a feasibility study and why should it take until 2023 to carry this out?</p> <p>MIDD05/2020</p> <p>Why are you committing to accept no action to improve the AQMA on Lewin Street until 2025 at the earliest? The eastern bypass may reduce the number of HGVs using Lewin Street but by the time this is completed, due to proposed housing development, the population of Middlewich will have increased and as such so will the number of vehicles using Lewin Street also!</p> <p>MIDD06/2020</p> <p>Chester Road, especially within the AQMA, is not suited to the high volume of HGVs that use it to and from Winsford. This area should be restricted from being used by this type of through traffic and that should be made to use alternative routes i.e., M6 and the A556.</p> <p>GN15/2020</p> <p>Weight restrictions should be introduced within the current Middlewich AQMAs and all future areas identified.</p> <p>GN18/2020</p> <p>Promoting low emission transport and install additional EV recharging points.</p> <p>What is the council's strategy for increasing publicly accessible points within Middlewich town centre?</p> <p>GN19/2020</p> <p>Public transport facilities</p> <p>Bus services within the Middlewich area, the no 42 only operates during the day Monday to Saturday (not Sundays or weekday evenings).</p> <p>The no 37, again only operates Monday to Saturday (not Sundays) and a reduced evening service.</p> <p>You cannot travel by public transport, be it Bus or Train, from or to Middlewich on a Sunday!</p>	
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<p>Member of the public – Middlewich area</p>	<p>Public Consultation</p>	<p>Response:</p> <ul style="list-style-type: none"> • Comments noted • With regards to particulate levels this is currently calculated in accordance with Defra guidance and we are currently looking at options to monitor particulate matter across the Borough. • With regards to cycling schemes this would fall under GN11/2020 and we also support the Cheshire East Cycling Strategy. • MIDD1/2020 the figure has been calculated using information available from Planning • MIDD02/2020 the point is acknowledged but by including it within this current plan we are able to provide due consideration to it in the future • GN18/2020 work has begun on a Cheshire East EV Strategy • GN19/2020 Town Delivery Plans are being developed to look at public transport
<p>Member of the public – Middlewich area</p>	<p>Public Consultation</p>	<p>The plan should be integrated with other initiatives such as noise and vibration reduction. These are all contributing factors to life quality and health and therefore go hand in hand. There is little evidence to support the fact that various departments within the council coordinate their activities and initiatives. Also the plan does not show integration with bodies such as the Environment Agency.</p> <p>There is general feeling when reading the document that the Air Quality Team lack any teeth or punch within the council and general society. Most of their involvement in local affairs comes across as vague and passive rather than up front and deliberate.</p> <p>Some of the objectives in the plan are outside the control and influence of the Air Quality team, more achievable targets for the Air Quality Team with immediate specific dates with specific actions should be included. Rather than vaguer actions such as support Middlewich Train station or support Southern bypass. Actions should be more like: reduce speed limit along xxx road by 2nd May 2021. Too many of the actions relate to initiatives that have no real certainty of happening and are too far in the future. Immediate achievable and effective actions need to be identified.</p> <p>Updated information such as Annual Status Reports (ASRs) should be open and accessible to the public and advertised more actively every time they have been updated.</p> <p>What criteria is used to declare an AQMA and who decides, what is the process for AQMA identification. How can a member of the public raise awareness of an area where they think that air quality is of a poor standard. Middlewich AQMA Chester Road</p> <p>This AQMA is on a one way system and therefore is only subjected to half the traffic volume why is this so? Surely a more accurate representation would be obtained if the AQMA was sited along a two way traffic area along Chester Road.</p> <p>New developments</p> <p>The plan states that developers must assess and comply with air quality measures so why are so many developments such as the ANSA waste site and new housing estates at Glebe farm being allowed to progress. No evidence that these developments have even considered air quality. There seems to be no input from the Cheshire East Air Quality Team on the outcome of these planning approvals. Details of the criteria that developers have to meet need to be made available to the public.</p>

Middlewich Eastern Bypass

How has the potential air quality changes been assessed for this proposed change. Improvements will be made to Lewin street but other areas of town such as Centurion Way and Holmes Chapel Road will deteriorate.

Carbon Neutrality by 2025

What does this actually mean. Is it just within the working of Cheshire East Council or across the whole borough including everyone. What are the plans e.g. council use all electric vehicles, all staff cycle to work?

Air Quality assessment criteria

This should be reviewed and changed e. g. assessing levels at the façade of dwellings does not address the whole issue, levels of pollutants affect pedestrians too, therefore levels should be assessed at walking and cycling zones.

Reasons for not Pursuing Action Plan Measures (Appendix B)

Some of the reasons for not pursuing actions leave the issue hanging with no alternative. Where there are no alternatives to redirect HGVs onto other routes, reductions in speed limits should take effect. The effectiveness of the Air Quality Team seems passive in these instances.

Lock down highlighted how good air quality can be

During lock down it felt that air quality had improved and areas where much quieter which showed how good things can be. It should be noted that a great deal of data throughout times of lockdown should not be taken as representative data.

Response:

- Comments noted
- This Action Plan details how we propose to work with all internal and external partners
- The Annual Status Report is freely available on the Council's website each year
- With regards to AQMA declarations, these are based on monitoring data that highlight specific areas that are above the annual air quality objective over several years
- The air quality team will assess all relevant planning applications for any potential impact on air quality
- Air Quality assessment criteria is determined using Defra guidance

Appendix B: Reasons for not Pursuing Action Plan Measures

Table B.1 – Action plan measures not pursued and the reasons for that decision

Measure No.	Action Category	Action Description	Reason action is not being pursued (including Stakeholders views)
GN8	Vehicle Fleet Efficiency	To work with partners to undertake vehicle testing schemes	Not feasible to pursue currently due to cost levied by the company who undertake the testing
GN9	Other	NOx-busting paint	This has been put on hold whilst awaiting the outcome of further research
AREA SPECIFIC ACTIONS			
CRE1	Transport Planning and Infrastructure	Review the requirement of the pelican crossings along Nantwich Road, Crewe	Completed: Highways have reviewed the area and implemented the changes. NO ₂ levels reduced and AQMA to be revoked
CRE2	Traffic Management	Traffic flow review study from Manchester Bridge to Vernon Way, Crewe	NO ₂ levels reduced and AQMA to be revoked
CRE3	Traffic Management	Review traffic light signalling along Nantwich Road, Crewe	Completed: Wireless Mesh communications system installed. Review of the linking between the signal junctions undertaken this year. NO ₂ levels reduced and AQMA to be revoked
DIS1	Traffic Management	Ensure the A6 Corridor is managed as part of the SEMMMS scheme	Completed: Planning conditions to require enhanced mitigation
DIS3	Traffic Management	Speed limit reduction on A6, Disley	30 mph limit not supported by the Police - did not meet the requirements of the Council's Speed Limit Policy. The mitigation measures installed as part of SEMMMS were designed to try and achieve better compliance with the existing speed limits.
DIS7	Traffic Management	Review lights at Redhouse Lane junction in Disley	Completed: Lights now turn red when no car is waiting to exit.
KNU1	Traffic Management	Review the A50 roundabout in Knutsford	Highways advised Section 278 works for this junction with the trigger being 100 houses. Nothing started yet but work proposes closing one gantry, moving crossings back, making the island bigger and introducing pedestrian guard rails. NO ₂ levels reduced and AQMA to be revoked
KNU2	Other	Review pedestrian crossings on the A50 roundabout in Knutsford	Highways advised Section 278 works for this junction with the trigger being 100 houses. Nothing started yet but work proposes moving crossings further down the road. NO ₂ levels reduced and AQMA to be revoked
KNU3	Other	Review the A556 Bypass impact	Completed: NO ₂ levels significantly reduced and AQMA to be revoked
MACC2	Traffic Management	Parking restrictions on Broken Cross, Macclesfield at peak periods	Completed: Restricting parking would have little impact on emissions as it is the roundabout causing the issue. Roundabout is being reviewed as part of a planning application.
MACC3	Traffic Management	Review road parking and parking time on Park Lane, Macclesfield	Completed: Parking is not a problem in the area, pedestrian crossing also reviewed. NO ₂ levels reduced and AQMA to be revoked

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MIDD1 & SAND2	Freight and Delivery Management	Vehicle weight restriction	No alternative routes currently available
NANT4	Traffic Management	Review the 'keep clear' signage on Hospital Street, Nantwich	Completed: Road has been repainted with Keep Clear
NANT5	Traffic Management	Review the railway crossing timings on Wellington Road, Nantwich	Network Rail has stated that due to H&S reasons, the timings cannot be changed although there is a review process
SAND1	Traffic Management	Review flows and priorities at Ashfield Way, Sandbach	Completed: Modelling work has been undertaken and the outcome will be implemented by CE Highways in 2021/2022.

Glossary of Terms

Abbreviation	Description
AADT	Average Annual Daily Traffic
AADT	Average Annual Daily Traffic
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
AQS	Air Quality Strategy
ASR	Air quality Annual Status Report
CAZ	Clean Air Zone
Defra	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
EFT	Emissions Factor Toolkit, DEFRA vehicle emission tool calculator
EU	European Union
EV	Electric-engine Vehicle
HGV	Heavy Goods Vehicles
LAQM	Local Air Quality Management
LES	Low Emission Strategy
LGV	Low Goods Vehicles
LTP	Local Transport Plan
LEZ	Low Emission Zone
NO₂	Nitrogen Dioxide

NO_x	Nitrogen Oxides
PHOF	The Public Health Outcomes Framework
PM₁₀	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
PM_{2.5}	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less



Picture credit- Martin Brown