



# ***Ashford Borough Council LAQM Progress Report 2014***

*Bureau Veritas Air Quality*

*April 2014*





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## DOCUMENT CONTROL SHEET

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## Executive Summary

Part IV of the Environment Act 1995 places a statutory duty on local authorities to review and assess the air quality within their area and take account of Government Guidance when undertaking such work. This Progress Report is a requirement of the Fifth Round of Review and Assessment and is a requirement for all local authorities. The report is submitted within the permitted schedule of reporting - end of April 2014. The Report has been undertaken in accordance with the Technical Guidance LAQM.TG (09) and associated tools (as updated in 2013).

This Progress Report considers all new monitoring data and assesses the data against the Air Quality Objectives. It also considers any development changes that may have an impact on air quality as well as updating on any relevant strategy and policy changes.

Having considered the latest monitoring data and development updated, it is concluded that the air quality objectives for benzene, 1, 3-butadiene, carbon monoxide, lead, PM<sub>10</sub> and sulphur dioxide will be met. There is no requirement to undertake a detailed assessment for these pollutants.

Moreover, between 2012 - 2013 there were no exceedences of the AQS objectives for nitrogen dioxide at any monitoring site within Ashford.

Therefore there is no need for a Detailed Assessment at this stage.

Proposed actions arising from this Progress Report are as follows:

- Progress to the 2015 Updating Screening and Assessment.

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# **1 Introduction**

## **1.1 Description of Local Authority Area**

The largest borough in Kent, Ashford has a fast-growing population which has more than trebled in the last 40 years to around 112,000 residents. Designated by the Government as a growth area, a £2.5 billion investment programme is under way to provide 31,000 new homes and 28,000 jobs by 2031. Although the urban area of Ashford is expanding, much of the borough is rural in character, including protected areas such as Romney Marsh, the North Downs and the High Weald.

The main source of air pollution in the borough is road traffic emissions from major roads, notably the M20, A20, A28 and A292. Other pollution sources, including commercial, industrial and domestic sources, also make a contribution to background pollution concentrations.

## **1.2 Purpose of Progress Report**

This report fulfils the requirements of the Local Air Quality Management (LAQM) process as set out in Part IV of the Environment Act (1995), the Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2007 and the relevant Policy and Technical Guidance documents. The LAQM process places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether or not the air quality objectives are likely to be achieved. Where exceedences are considered likely, the local authority must then declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in pursuit of the objectives.

Progress Reports are required in the intervening years between the three-yearly Updating and Screening Assessment reports. Their purpose is to maintain continuity in the Local Air Quality Management process.

They are not intended to be as detailed as Updating and Screening Assessment Reports, or to require as much effort. However, if the Progress Report identifies the risk of exceedence of an Air Quality Objective, the Local Authority (LA) should undertake a Detailed Assessment immediately, and not wait until the next round of Review and Assessment.

## 1.3 Air Quality Objectives

The air quality objectives applicable to Local Air Quality Management (LAQM) in **England** are set out in the Air Quality (England) Regulations 2000 (SI 928), and the Air Quality (England) (Amendment) Regulations 2002 (SI 3043). They are shown in Table 1. This table shows the objectives in units of microgrammes per cubic metre  $\mu\text{g}/\text{m}^3$  (for carbon monoxide the units used are milligrammes per cubic metre,  $\text{mg}/\text{m}^3$ ). Table 1 includes the number of permitted exceedences in any given year (where applicable).



**Table 1 - Air Quality Objectives included in Regulations for the purpose of Local Air Quality Management in England**

Pollutant			Date to be achieved by
	Concentration	Measured as	
Benzene	16.25 $\mu\text{g}/\text{m}^3$	Running annual mean	31.12.2003
	5.00 $\mu\text{g}/\text{m}^3$	Running annual mean	31.12.2010
1,3-Butadiene	2.25 $\mu\text{g}/\text{m}^3$	Running annual mean	31.12.2003
Carbon monoxide	10.0 $\text{mg}/\text{m}^3$	Running 8-hour mean	31.12.2003
Lead	0.5 $\mu\text{g}/\text{m}^3$	Annual mean	31.12.2004
	0.25 $\mu\text{g}/\text{m}^3$	Annual mean	31.12.2008
Nitrogen dioxide	200 $\mu\text{g}/\text{m}^3$ not to be exceeded more than 18 times a year	1-hour mean	31.12.2005
	40 $\mu\text{g}/\text{m}^3$	Annual mean	31.12.2005
Particles ( $\text{PM}_{10}$ ) (gravimetric)	50 $\mu\text{g}/\text{m}^3$ , not to be exceeded more than 35 times a year	24-hour mean	31.12.2004
	40 $\mu\text{g}/\text{m}^3$	Annual mean	31.12.2004
Sulphur dioxide	350 $\mu\text{g}/\text{m}^3$ , not to be exceeded more than 24 times a year	1-hour mean	31.12.2004
	125 $\mu\text{g}/\text{m}^3$ , not to be exceeded more than 3 times a year	24-hour mean	31.12.2004
	266 $\mu\text{g}/\text{m}^3$ , not to be exceeded more than 35 times a year	15-minute mean	31.12.2005

## 1.4 Summary of Previous Review and Assessments

Between 1998 and 2001, Ashford Borough Council undertook its first round of review and assessment of air quality. The first round assessments (Stages 1, 2 and 3) concluded that it was not necessary to declare any Air Quality Management Areas (AQMA) for any pollutant.

The first phase of the second round of review and assessment, the Updating and Screening Assessment (USA), was completed in May 2003 and this provided an update with respect to air quality issues within the borough since the previous round. The USA concluded that a detailed assessment was required for particulates (PM<sub>10</sub>) due to road traffic emissions from the M20 between Junctions 9 & 10. The highest predicted levels were identified at receptors 25 m south of the M20, near Canterbury Road. The Detailed Assessment (April 2004) concluded that the objectives would in fact be met at relevant receptors near the M20 and no AQMA declaration was required.

The third round of review and assessment, undertaken between 2006 and 2008, concluded that all prescribed objectives would be met and no detailed assessment was required. Therefore, no AQMA was declared.

The first phase of the fourth round of review and assessment (USA 2009) concluded that the air quality objectives for benzene, 1, 3-butadiene, carbon monoxide, lead, PM<sub>10</sub> and sulphur dioxide would be met. However, the USA identified exceedences of the annual mean NO<sub>2</sub> objective in 2008 as follows:

- at one location in Lees Road, near the M20 J10 (identified through passive diffusion tube monitoring);
- At a kerbside location in Canterbury Road (identified through passive diffusion tube monitoring), where there was no relevant exposure. This site was re-located in 2008 to a relevant receptor location in Gore Court;
- On the basis of DMRB modelling, annual mean NO<sub>2</sub> concentrations were predicted to be above 36 µg/m<sup>3</sup> (but met the objective of 40µg/m<sup>3</sup>) at three locations, such as to warrant further investigation. These locations were junctions of the A292 Somerset Road with North Street, Wellesley Road and New Street.

At the time of the USA, proposals by the Highway Agency to build a new junction 10A (as the capacity of J10 is insufficient to enable further major development in the southeast part of Ashford) had not been finalised. Also, proposals to address 'operation stack' (when the police use the M20 for parking HGVs when there is a problem at the Port of Dover) were unclear. Therefore, Ashford Borough Council did not consider it prudent to proceed to a detailed assessment on the basis of the marginal NO<sub>2</sub> annual mean exceedence in Lees Road, but instead established a continuous NO<sub>2</sub> analyser in the locality.

In addition, since the USA 2009, Ashford Borough Council has undertaken additional monitoring of NO<sub>2</sub> using passive diffusion tubes at relevant receptor locations at junctions along the A292 Ashford Circular Road where DMRB model predictions in 2008 were above 36µg/m<sup>3</sup>.

The 2010 Annual Progress Report found there were no exceedences of the annual mean NO<sub>2</sub> objective, identified through passive diffusion tube monitoring, near Junction 10 of the M20 at the location relevant of public exposure. Also monitoring indicated the objectives were likely to be met at the junctions along the A292 Ashford Circular Road system. Thus there was no need for any detailed assessments at that time.

The 2011 Progress Report included 12 months of real time monitoring at the site near Junction 10 of the M20 and concluded that all prescribed objectives would be met at that location and elsewhere, and that there was no requirement to undertake a Detailed Assessment. Passive monitoring has since continued in the vicinity of Junction 10 of the M20.

The 2012 Updating and Screening Assessment had not identified any significant changes in emissions sources within the Ashford district area. Therefore, there was no requirement to proceed to a Detailed Assessment for any pollutant.

Since air quality in Ashford had continued to meet the relevant air quality objectives and the monitoring data had not shown any significant changes, Ashford Council was granted a deferral of LAQM reporting requirements by Defra in 2013. Therefore, this report provides a review of local air quality for the years 2012-2013.

## **2 New Monitoring Data**

### **2.1 Summary of Monitoring Undertaken**

This section provides details of monitoring carried out in 2012-2013, the years covered by this report.

Only one change in monitoring sites since the year 2011 (as reported in the Updating and Screening Assessment 2012) was made as follows (all other sites remained the same):

- Diffusion tube site AS13 at Hill View closed in May 2011.

#### **2.1.1 Automatic Monitoring Sites**

The Ashford Background automatic monitoring site measuring NO<sub>2</sub>, PM<sub>10</sub> and ozone operated from September 2008 until April 2011. This site was closed as it became unreliable. No other automatic monitoring has since been carried out in the borough.

#### **2.1.2 Non-Automatic Monitoring**

Ashford Borough Council undertook monitoring at 16 nitrogen dioxide diffusion tube sites in 2012-2013. Details of the monitoring sites are shown in Table 2, whilst their location is provided in Figure 1 through to Figure 4.

Since the completion of the 2012 Updating and Screening Assessment one site – AS13 at Hill View – has closed in May 2011.

One site was relocated in 2012:

- AS25 moved from 1A Somerset Rd to Hollington Place on 29/02/2012 (name change but not a grid reference change).

There have not been any changes to the remaining sites.

Figure 1 - Map of Non-Automatic (Diffusion Tube) Monitoring Sites: Ashford

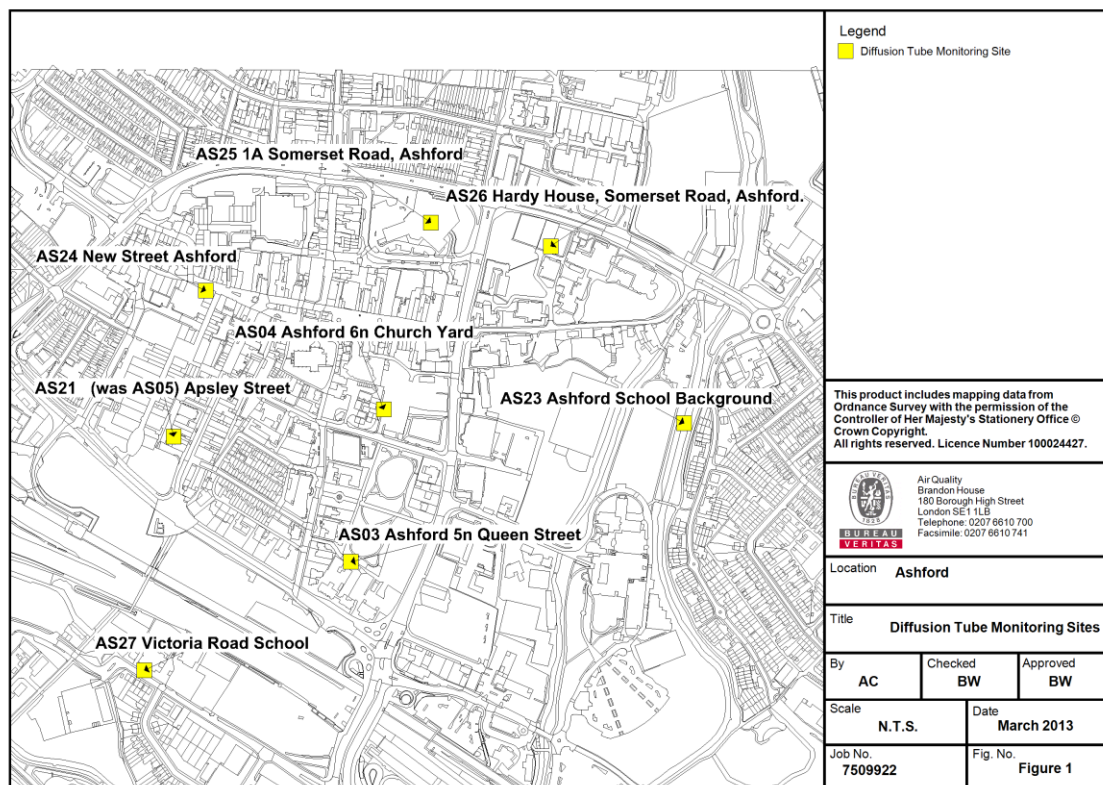


Figure 2 - Map of non-automatic (Diffusion Tube) monitoring site: Southwest Ashford

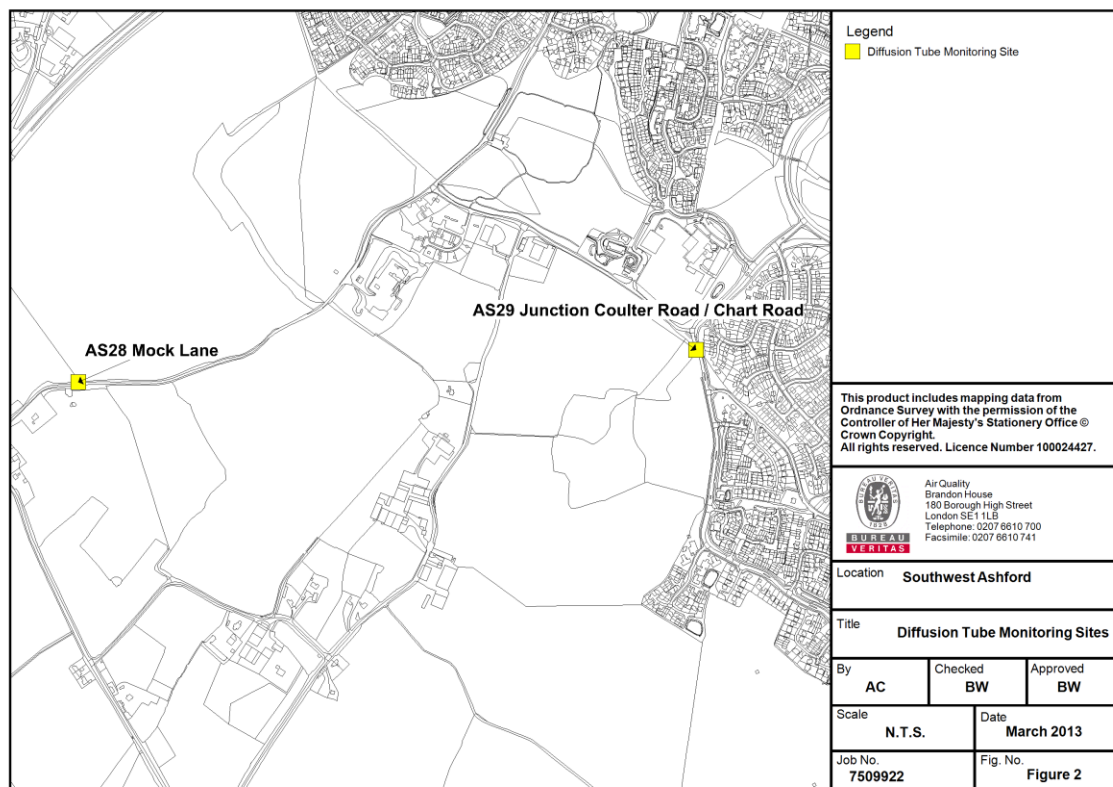




Figure 3 - Map of non-automatic (Diffusion Tube) monitoring site: M20 near Junction 10

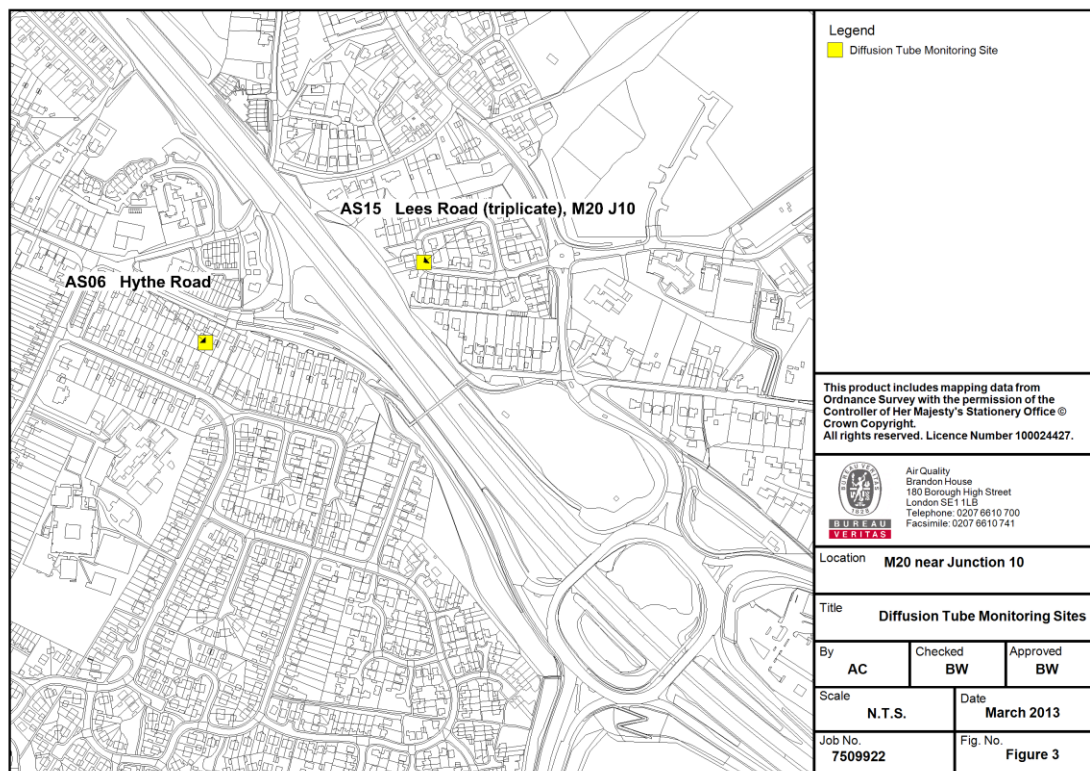


Figure 4 - Map of non-automatic (Diffusion Tube) monitoring site: Tenterden

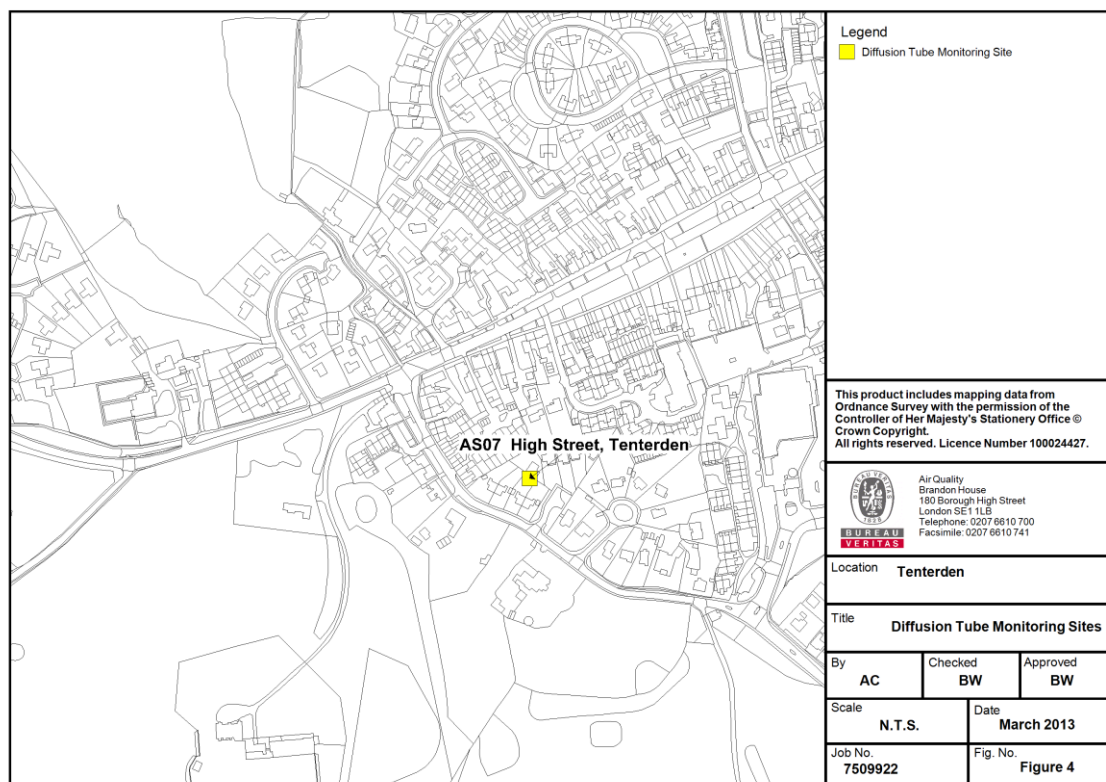


Table 2 - Details of Non- Automatic Monitoring Sites

Site ID	Site Name	Site Type	OS Grid Ref (x, y)		Pollutants Monitored	In AQMA?	Relevant Exposure? (Y/N with distance (m) to relevant exposure)	Distance to kerb of nearest road (N/A if not applicable)	Worst-case Location?
AS03	Ashford 5n Queen Street	Roadside	600976	142547	NO <sub>2</sub>	No	Y – in line with facade	3 m	No
AS04	Ashford 6n Church Yard	Background	601021	142754	NO <sub>2</sub>	No	N	N/A	No
AS06	Hythe Road	Roadside	603153	141990	NO <sub>2</sub>	No	Y-6 m	2 m	No
AS07	High Street, Tenterden	Roadside	587945	133079	NO <sub>2</sub>	No	N	8 m	No
AS14	Nutley Close	Roadside	601460	143509	NO <sub>2</sub>	No	Y-0 m	22 m	No
AS15	Lees Road (triplicate), M20 J10	Roadside	603401	142081	NO <sub>2</sub>	No	Y-0 m	30 m (M20)	No
AS18	Hill View Nursing Home (triplicate)	Roadside	601309	143569	NO <sub>2</sub>	No	Y-0 m	16.5 m	No
AS21	(was AS05) Apsley Street	Roadside	600734	142717	NO <sub>2</sub>	No	Y-0 m	3.5 m	No
AS22	Gore Court	Roadside	601218	143491	NO <sub>2</sub>	No	Y-0 m	11 m	No
AS23	Ashford School Background (triplicate)	Background	601431	142735	NO <sub>2</sub>	No	Y-0 m	N/A	No
AS24	New Street Ashford	Roadside	600778	142915	NO <sub>2</sub>	No	N	10m	No
AS25	Hollington Place, Ashford	Roadside	601085	143007	NO <sub>2</sub>	No	Y- 0m	2.5m	Yes
AS26	Hardy House, Somerset Road, Ashford.	Roadside	601249	142975	NO <sub>2</sub>	No	Y -1.8m	3.5 m	Yes
AS27	Victoria Road School	Roadside	600794	142320	NO <sub>2</sub>	No	Y -0 m	2.1 m	Yes
AS28	Mock Lane	Kerbside	597558	140734	NO <sub>2</sub>	No	No	0.5 m	No
AS29	Junction Coulter Road / Chart Road	Kerbside	598803	140799	NO <sub>2</sub>	No	No	0.5 m	No

## **2.2 Comparison of Monitoring Results with Air Quality Objectives**

### **2.2.1 Nitrogen Dioxide**

#### **Diffusion Tube Monitoring Data**

The NO<sub>2</sub> diffusion tube data are summarised in Table 3. The full datasets (monthly mean values) for 2012 and 2013 are included in Appendix B.

The diffusion tubes are supplied and analysed by ESG Didcot utilising the 50% Triethanolamine (TEA) in acetone preparation method. Full details of the bias adjustment and QA/QC procedure are provided in Appendix A.

As data capture for 2013 was very good for all the sites, annualisation was not required.

The annual mean NO<sub>2</sub> objective was not exceeded at any of the diffusion tube sites in the Borough during 2012-2013.



**Table 3 - Results of Nitrogen Dioxide Diffusion Tubes**

Site ID	Site Name	Site Type	Within AQMA?	Triplicate or Co-located Tube	Data Capture 2013 (Number of Months)	Annual Mean Concentration ( $\mu\text{g}/\text{m}^3$ )		
						2011 (Bias Adjustment Factor = 0.84)	2012 (Bias Adjustment Factor = 0.79)	2013 (Bias Adjustment Factor = 0.80)
AS03	Ashford 5n Queen Street	Roadside	N	N	12	23.6	20.0	20.7
AS04	Ashford 6n Church Yard	Background	N	N	12	18.6	18.8	18.0
AS06	Hythe Road	Roadside	N	N	11	35.7	31.1	33.3
AS07	High Street, Tenterden	Roadside	N	N	11	27.6	24.6	26.2
AS14	Nutley Close	Roadside	N	N	11	25.7	25.9	27.3
AS15*	Lees Road, M20 J10	Roadside	N	Y (Triplicate)	12	38.2	38.6	32.5
AS18*	Hill View Nursing Home	Roadside	N	Y (Triplicate)	12	29.0	29.2	31.7
AS21	(was AS05) Apsley Street	Roadside	N	N	12	24.3	23.2	24.3
AS22	Gore Court	Roadside	N	N	12	31.6	32.3	31.6
AS23	Ashford School Background	Background	N	N	12	19.1	19.3	19.9

<b>AS24</b>	<b>New Street Ashford</b>	Roadside	N	N	12	23.2	23.2	22.3
<b>AS25</b>	<b>Hollington Place, Ashford</b>	Roadside	N	N	10	35.3	22.2	20.8
<b>AS26</b>	<b>Hardy House, Somerset Road, Ashford.</b>	Roadside	N	N	12	29.6	30.5	33.0
<b>AS27</b>	<b>Victoria Road School</b>	Roadside	N	N	12	17.6	21.3	21.2
<b>AS28</b>	<b>Mock Lane</b>	Kerbside	N	N	12	12.5	13.8	14.6
<b>AS29</b>	<b>Junction Coulter Road / Chart Road</b>	Kerbside	N	N	12	15.5	16.4	17.4
* Average of triplicate sites								

### **2.2.2 PM<sub>10</sub>**

Monitoring of PM<sub>10</sub> ceased in 2011 when the Ashford Background automatic monitoring site closed. The results for that site from previous years (2008 - 2010) have shown that there is no risk of exceeding the AQS objectives for this pollutant.

### **2.2.3 Summary of Compliance with AQS Objectives**

Ashford Borough Council has examined the results from monitoring in the Borough. Concentrations are all below the objectives, therefore there is no need to proceed to a Detailed Assessment.

## 3 New Local Developments

### 3.1 Road Traffic Sources

LAQM requires local authorities to consider the following:

- Narrow congested streets with residential properties close to the kerb;
- Busy streets where people may spend one hour or more close to traffic;
- Roads with a high flow of buses and/or HGVs;
- Junctions;
- New roads constructed or proposed;
- Roads with significantly changed traffic flows; or
- Bus or coach stations.

Ashford Borough Council have identified three new developments which have not been assessed previously. These developments are described below with details summarised in the table at the end of the section.

#### ***Planning Application 11/00932/AS***

The development comprises a no- food retail store with associated on-site parking spaces and is proposed to be occupied by John Lewis at Home. The site is located adjacent to the strategic highway network with the A20 Fougères Way to the front of the site and the M20 junction 9 located to the north east. Access to the site will be gained directly from the A20 Fougères Way. The traffic generated by the development is expected to be 1079 vehicle movements per day.

The Air Quality Technical Note produced to support the application concluded that an air quality assessment for the scheme would not be required because:

- The development would not generate sufficient traffic to increase pollutant concentrations at existing receptors by a significant amount (traffic generated by the development would be significantly less than 10% of flows on the surrounding roads).
- The development would not introduce new exposure within an existing Air Quality Management Area.
- The development would not introduce new exposure in a location where air pollutant concentrations are above air quality objective values.

- The development would not interfere with the implementation of an Air Quality Action Plan or Air Quality Strategy.

However, due to the development scale, it is recommended that the impacts are considered in the Updating and Screening Assessment 2015.

### ***Planning Application 10/01663/AS***

The proposed development of Site A comprises of 62 dwellings in total, expected to generate approximately 100 vehicle movements per day<sup>1</sup>.

The proposed development of Site C comprises of: an office block with a gross external area of 5,328 m<sup>2</sup> including approximately 115 parking spaces; and an extra care facility of 66 units and approximately 32 car parking spaces. Site C is expected to generate approximately 450 vehicle movements per day<sup>2</sup>.

The Air Quality Technical Note produced to support the application concluded that an air quality assessment for the scheme would not be required because:

- The development would not generate sufficient traffic to increase pollutant concentrations at existing receptors by a significant amount (traffic generated by the development would be significantly less than 10% of flows on the surrounding roads).
- The development would not introduce new exposure within an existing Air Quality Management Area.
- The development would not introduce new exposure in a location where air pollutant concentrations are above air quality objective values.
- The development would not interfere with the implementation of an Air Quality Action Plan or Air Quality Strategy.

### ***Planning Application 05/01798/AS***

The proposed development is to construct a total of approximately 780 residential units and 7,000 m<sup>2</sup> of flexible commercial and mixed use accommodation including shops, offices, public house, restaurant and community facilities. An Environmental Impact Assessment to support this planning application was undertaken in 2005, and concluded the following:

- The greatest impact on air quality for residents during the operation phase of the development will occur at apartments closest to the new road proposed to run

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<sup>1</sup> Peter Brett Associates LLP (2011) *Air Quality Technical Note. Planning Application 10/01663/AS.*

<sup>2</sup> As above.

through the site. However, re-routing of traffic through the site should result in some improvement in air quality for residential receptors in the vicinity of the existing Newtown Road. Overall, the proposals will not cause significant air quality impact for the nearest existing residents, nor are they likely to result in any exceedance of current national air quality objectives or standards.

- Provided appropriate measures are taken to monitor and control dust during demolition and construction there should be no significant adverse effects on air quality.

Due to the development scale, it is recommended that monitoring continues at the existing locations in Ashford and that the development impacts are duly considered in the Updating and Screening Assessment 2015.

Planning Reference /Decision	Location	Grid Reference	Description	Additional Information
11/00932/AS Full Planning Permission	Land adjoining Fougères Way /Maidstone Road, Ashford, Kent	600190 143884	<ul style="list-style-type: none"> <li>Construction of a 5,574m<sup>2</sup> retail store for John Lewis at Home, together with car parking (200 spaces), access, landscaping and associated works (access from A20 Fougères Way).</li> </ul>	Development has been completed and opened in November 2013.
10/01663/AS	Site A: Land East of Maidstone Rd Opposite Sir John Fogge Ave. Site C: Land between Fougères Way and Simone Weil Ave and Warren Lane, Ashford.	599967 143969	<ul style="list-style-type: none"> <li>Construction of 61 residential units (site A) and new building containing 67 extra care residential units with associated parking (site C).</li> </ul>	Now under construction.
05/01798/AS Outline Planning Permission	Old Railway Works, Newtown Road, Ashford, Kent, TN24 0PN	601763 141605	<ul style="list-style-type: none"> <li>788 residential units and 1,156 sq m of A1, A2, A3, A4, A5, B1, C1, D1 and D2 floorspace.</li> <li>Change of use of listed buildings to provide 140 residential units and 5710 sq m of A1, A2, A3, A4, A5, B1, C1, D1 and D2 floorspace.</li> <li>A total of 957 car parking spaces within and without the listed buildings.</li> </ul>	Application registered in 2006 with permission given in 2009 but Phase 1 construction commenced towards the end of 2013.

## **3.2 Other Transport Sources**

Ashford Borough Council confirms there are no newly identified or newly implemented other transport sources, which may have an impact on air quality within the Local Authority area.

## **3.3 Industrial Sources**

Ashford Borough Council confirms that there are no new or newly identified industrial sources (either under the LAPC regime or EP Regulations) which may have an impact on air quality within the Local Authority area.

## **3.4 Commercial and Domestic Sources**

LAQM requires local authorities to consider the following:

- Biomass combustion plant – individual installations;
- Areas where the combined impact of several biomass combustion sources may be relevant; and
- Areas where domestic solid fuel burning may be relevant.

### **Biomass Combustion Plant – Individual Installations**

Ashford Council had identified one biomass installations which is over the 50kW criteria for assessment:

- 1 x 300-400 KW wood chip boiler at the Godmersham Park House, Godmersham Park, Canterbury Road, Godmersham, Canterbury (planning application 13/00636/AS, registered on 7 June 2013, planning permission granted on 24 July 2013).

In order to undertake a screening assessment for the above installations, Ashford Council will liaise with the relevant stakeholders to obtain data regarding the specification and design of the appliance.

However, it is expected that the impacts on local air quality are unlikely to be significant as the installation is located in a rural area and at considerable distance from majority of receptors. The Design and Access Statement submitted with the application concluded that *the proposed site is considered acceptable as it is adjacent to an existing building and well screened in the wider countryside.*

### 3.5 New Developments with Fugitive or Uncontrolled Sources

Ashford Council confirms there are no new developments with fugitive or uncontrolled sources.

Ashford Borough Council has identified the following new or previously unidentified local developments which may impact on air quality in the Local Authority area.

- New retail store development at the land adjoining Fougères Way /Maidstone Road, Ashford
- New residential/commercial development at the Old Railway Works, Newtown Road, Ashford
- New biomass installation at the Godmersham Park House, Godmersham Park, Canterbury Road, Godmersham, Canterbury

These will be taken into consideration in the next Updating and Screening Assessment, scheduled for 2015.



## 4 Local / Regional Air Quality Strategy

Ashford Borough Council does not have a Local Air Quality Strategy, but works in partnership with Kent County Council and the Kent and Medway district authorities through the Kent & Medway Air Quality Partnership on air quality issues across Kent.

Furthermore, Ashford Council have used some of the local health services funding to support active travel for school children in the Borough - the project called Green School Champions. A very successful event was organised to promote the project, with all the targeted schools joining the scheme. More schools have now been selected for the next stage of this project.

### KENT ENVIRONMENT STRATEGY

Kent County Council, in partnership with Kent local authorities, has produced a Regional Environment Strategy<sup>3</sup>, completed in July 2011. The Strategy considers air quality issues county-wide and includes the following actions relevant to air quality:

- Action EF 2.2: Ensure that 'smart mobility', including easy access to local services, public transport and broadband is at the core of all new developments, where feasible, to improve air quality, reduce congestion and improve marketability.

The implementation of this Action is ongoing, with main targets to be met by 2013 – 2014.

- Action CC5.2: Keep traffic moving and reduce the need to travel through encouraging and enabling smarter working and sustainable travel choices.

The implementation of this Action is ongoing, with main targets to be met by 2016.

The Kent Environment Strategy Progress Report (2013) provides an update with respect to progress with targets and actions relating to air quality, as shown below.

Overall progress towards targets<sup>4</sup>:

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<sup>3</sup> [http://www.kent.gov.uk/environment\\_and\\_planning/environment\\_and\\_climate\\_change/kent\\_environment\\_strategy.aspx](http://www.kent.gov.uk/environment_and_planning/environment_and_climate_change/kent_environment_strategy.aspx)

<sup>4</sup> Kent County Council (2013) *Kent Environment Strategy Implementation Plan. Monitoring Progress July 2013*

- A. Local air quality targets (these align to Actions EF2.2 and CC5.2):
- Apart from few exceptions with NO<sub>2</sub> and ground level O<sub>3</sub> local air quality targets have been met.
  - The annual mean NO<sub>2</sub> objective was not exceeded at any of the diffusion tube sites in the Ashford Borough during 2012-2013.
- B. Successful grant applications for electric vehicle charging points leading to the proportion of electric and alternative fuelled vehicles in Kent being above comparable local authority areas elsewhere in the UK (this aligns to Action CC5.2):
- KCC has been successful in winning a grant of £237,000 for 2013/2014 period and a further £36,000 for 2014/2015 to provide 75% of the costs to install electric and hybrid vehicle points.
  - Fast charging points for electric vehicles will be located in local council car parks in Kent. Five charging points will be installed in Ashford, each supplied with a double fast charger unit, at the following car park locations:

<i>Site</i>	<i>Latitude/Longitude</i>
Civic / StourCentre, Ashford	GSM 51.145627, 0.878749
Vicarage Lane, Ashford	GSM 51.148463, 0.874604
Julie Rose Stadium, Ashford	GSM 51.155415, 0.899717
Station Road, Tenterden	GSM 51.068341, 0.685087
Leisure Centre, Tenterden	GSM 51.066901, 0.692804

The works are now in progress, with the project scheduled for completion by the end of April 2014.

Overall progress towards actions<sup>5</sup>:

Action EF 2.2	Progress
Develop guidance and update Kent Design to include recommendations from the Integrated Transport Strategy and supporting delivery of Growth without Gridlock.	A review of this action is planned for the next period.
Ensure that smart mobility is fully integrated within the development planning process, working collaboratively with developers to maximise opportunities for walking, cycling, public transport and other sustainable choices.	Travel plans are required to be produced by all developments that generate significant amounts of movement according to the National Planning Framework (NPPF).
Improve integration between Highways and Transportation and Public Health to ensure that active travel and smart mobility is integral to scheme design.	A review of new development proposals and local plans is planned to be undertaken over the next period.
Where feasible, future proof new developments for	Energy efficiency of buildings is considered in all new

<sup>5</sup> As above

climate resilience and new technologies (e.g. flooding, electric vehicles etc.).	<p>developments, all new developments must mitigate against the risk of flooding. Electric vehicle charging infrastructure is not necessarily explicit in local plans.</p> <p>A recent public consultation has ended on Sevenoaks District Council's Allocations and Development Management Plan (ADMP). This includes requirements that new developments include infrastructure that complements modern information technology needs, and restricts the need for future retrofitting. The plan is scheduled to be adopted over the next six months.</p>
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Action CC5.2	Progress
Pro-actively support the development of high quality walking, cycling and public transport routes through the Local Sustainable Transport Fund, Local Transport Plan and Growth Without Gridlock.	<p>Monitoring of business miles across Kent will be based on District GHG Reporting. Currently only two district reports are available and so these will be reported on at the next period.</p> <p>In KCC over the 2012/2013 period there was a reduction of over 9% in business miles compared to the previous 2011/2012 period.</p> <p>A proposal has been developed to implement a car/hire pool system in KCC.</p> <p>A review is planned for the next period that will look at the Local sustainable transport fund deliverables, which will contribute towards the action on fuel sources.</p>
Review of gas fuel infrastructure and potential for anaerobic digestion as a fuel source. Participate in further bidding opportunities to support smart mobility and greener travel choices e.g. OLEV Electric Vehicle infrastructure grants and Better Bus Area Fund.	<p>Kent partners will receive £237,000 for the 2013/2014 period and another £36,000 for 2014/2015 to provide 75% of the costs of installing electric and hybrid vehicle points.</p> <p>Dartford Borough Council was successful in bidding for £125,000.</p> <p>The South East Coast Ambulance service (SECAmb) also secured funding with £60,000 for this year and £37,500 the following year.</p> <p>There is currently no progress on anaerobic digestion.</p>
Establish a network of electric charging points in Kent.	<p>EST carried out a review of EV charging points across whole estate for KCC and other local authorities have also implemented charging points including Canterbury City Council at park and ride sites.</p> <p>Kent partners are working together to establish further opportunities for EV charging.</p>
Increase use of tele- and video conferencing facilities.	<p>KCC is currently awaiting the roll out of a unified communications system which will allow all members of staff to use tele- and video conferencing from each computer workstation.</p> <p>Further public sector reporting will be picked up in the next round once GHG reports are available.</p>
Develop policies for staff commuting.	No action to date although under review.
Ensure that the 'Doing Things Differently' programme of works address sustainable transport and enable smarter working.	Doing Things Differently will require more flexible and remote working. Services are aligning people to local clients to help reduce or avoid car travel.
Delivery of Cycling Strategies in Kent.	Ongoing.

## 5 Planning Applications

### ***Planning Application 12/01245/AS***

A planning application has been received in November 2012 for development proposals in Kennington (to the north of Ashford), which include a country park for recreational purposes and a housing development. Ashford Council has requested an Environmental Impact Assessment for the proposed scheme. The conclusions from An Air Quality Assessment submitted in Nov 2012 have been as follows:

- According to the IAQM assessment procedure<sup>6</sup> and based on the available information on the construction phase, the Proposed Development is considered to be a High to Medium Risk Site overall in respect of the potential for dust/PM<sub>10</sub> generation associated with the construction of the Proposed Development. A number of mitigation methods were proposed to reduce the impact to 'slight adverse to negligible'.
- In 2017, the anticipated opening year of the Proposed Development, the objective for annual mean NO<sub>2</sub> concentrations is predicted to be met at all of the existing assessment receptors. The highest concentration is 30.36µg/m<sup>3</sup>, predicted at Receptor 21, the façade of 331 Hythe Road. Based on the significance criteria produced by EPUK<sup>7</sup>, the effect of the Proposed Development on annual mean NO<sub>2</sub> concentrations is considered to be negligible at all of the existing assessment receptors. The greatest increase is 0.57µg/m<sup>3</sup> predicted at Receptor 41, the façade of 81 Kennington Road.
- With respect to particulate matter, the objective for annual mean PM<sub>10</sub> concentrations is predicted to be met at all of the existing assessment receptors. The highest concentration is 20.19µg/m<sup>3</sup>, predicted at Receptor 21, the façade of 331 Hythe Road. Based on the significance criteria produced by EPUK<sup>8</sup>, the effect of the Proposed Development on annual mean PM<sub>10</sub> concentrations is considered to be negligible at the majority of the existing assessment receptors and neutral at five receptors. The greatest increase is 0.15µg/m<sup>3</sup> predicted at Receptor 41, the façade of 81 Kennington Road.

<sup>6</sup> Institute of Air Quality Management (2011) *Guidance on the Assessment of the Impacts of Construction on Air Quality and the Determination of their Significance*.

<sup>7</sup> Environmental Protection UK (2010) *Development Control: Planning for Air Quality (2010 Update)*.

<sup>8</sup> As above.

Planning Reference /Decision	Location	Grid Reference	Description	Additional Information
12/01245/AS Pending decision - subject to an Environmental Impact Assessment	Conningbrook, Willesborough Road, Kennington, Kent	603068 143882	<ul style="list-style-type: none"> <li>• Creation of a country park for recreational and water-sports purposes with a range of associated facilities.</li> <li>• Construction of 300 residential dwellings.</li> <li>• Provision of an aggregates storage and distribution facility.</li> </ul>	Air Quality Assessment submitted in November 2012

## 6 Air Quality Planning Policies

All of Ashford Borough Councils Development Plan Documents (DPDs) include the production of a Sustainability Appraisal (SA) in parallel to the production of the DPD in question. The SA Framework used by the Council to assess the sustainability of the evolving policies within each DPD, includes a section on air quality, as well as other cross-cutting topics such as Transport. This ensures that air quality, and the impacts of potential policies on air quality, are considered as part of the planning process.

Ashford Borough Councils Core Strategy has two main policies that are relevant to air quality in the borough. Policy CS10 (Sustainable Design) is reproduced below in its entirety, as it is an innovative policy for a Local Authority Core strategy. Policy CS15, on transport, stresses the need for modal shift and the provision of public transport. This will help manage the impact of traffic movements in an ever developing borough and help manage air quality impact. Details of Policy CS15 are provided in Section 7.

### **POLICY CS10: Sustainable Design and Construction**

All major developments must incorporate sustainable design features to reduce the consumption of natural resources and to help deliver the aim of zero carbon growth in Ashford. Unless it can be demonstrated that doing so is not technologically practicable, would make the scheme unviable or impose excessive costs on occupiers, developments are expected to:

A) Achieve the standard set out below or specified in a later DPD, or an equivalent quality assured scheme, with a strong emphasis on energy, water and materials. These requirements will be met through:

- (a) Energy and water efficiency,
- (b) Sustainable construction materials, and,
- (c) Waste reduction.

B) Reduce carbon dioxide emissions through on-site sustainable energy technologies at the percentage set out below or at such other level as may be specified in a subsequent DPD.

C) Be carbon neutral which can be met through a combination of (A) and (B) above, with any shortfall being met by financial contributions to enable residual carbon emissions to be offset elsewhere in the Borough.

Where any site is brought forward as two or more separate development schemes of which one or more falls below the relevant threshold for this policy, the Council will require the relevant targets in the table below to be met as though the site had come forward as a single scheme.

Ashford LDF 2007 - 2014						
			(CS3) Town Centre & (CS4) Brownfield Urban Sites	(CS5) Urban Extensions & (CS4) Greenfield Urban Sites	(CS6) Tenterden, the Villages	Existing and refurbishment
(A)	BREEAM	Residential	Code Level 3	Code Level 4	Code Level 2	EcoHomes 'Very Good'
		Overall level	Very Good	Excellent	Good	Very Good
		Energy Credits	Excellent	Excellent	Excellent	Excellent
		Water Credits	Maximum	Maximum	Excellent	Excellent
		Material Credits	Excellent	Excellent	Very Good	Very Good
(B)		Minimum Carbon Dioxide Reduction				
			20%	30%	10%	10%

In July 2011 the Kent and Medway Air Quality Partnership have produced an Air Quality and Planning Technical Guidance, which gives advice to developers, consultants and local authorities regarding air quality issues with respect to development proposals in Kent.

With regard to Air Quality Assessments the guidance recommends that all assessments within Kent should follow similar methodologies. The Guidance includes an Air Quality Assessment Toolkit, which sets out the methodology for producing an air quality assessment and contains details regarding:

- Local Developments that would generally require an air quality assessment;
- Information required for the local authority officer to determine the need for an air quality assessment;
- Information to be agreed with the local authority prior to an assessment taking place;
- Basic requirements for an air quality assessment;
- Determining significance and whether mitigation/compensation is required;
- Checklist for reviewing air quality assessments.

With regard to sustainable transport and travel plans, the guidance recommends that all new developments should make provisions to encourage cycling and walking, and development should be supported by Travel Plans. Car parking should be minimised where developments are located within AQMAs and those close to public transport links. The Guidance also recommends the use of appropriate design measures to reduce exposure and minimise emissions of carbon dioxide.

New development mitigation measures should also include promoting the provision for refuelling of alternative fuels together with installing electric vehicle charging points in car parks, with the aim of increasing the use of cleaner-fuelled vehicles.

The Guidance recommends that local authorities seek appropriate funds through Community Infrastructure Levy (CIL) or Section 106 agreements to help to improve air quality.



## 7 Local Transport Plans and Strategies

### KENT LOCAL TRANSPORT PLAN

As reported in previous LAQM reports, Kent County Council adopted its 3<sup>rd</sup> Local Transport Plan, covering the period 2011 to 2016<sup>9</sup>, which sets out Kent County Council's (KCC) Transport Strategy and Implementation Plans for local transport investment.

The LTP objectives related to *A Safer and Healthier County* “prioritise spending to tackle Countywide problem sites including Air Quality Management Areas, crash cluster sites, and areas with high levels of health deprivation”. The report also states that “KCC will continue to work with the districts to assist in the development of Air Quality Action Plans (AQAPs) and consider appropriate mitigation measures which will then be put forward for inclusion in the annual Integrated Transport Programme”.

The Plan details the below themes and objectives:

#### ***Theme: Growth Without Gridlock***

Objectives: Tackling congestions, supporting regeneration, access to jobs and services and a resilient network

Transport Objectives: Reduce journey times, reduce disruption to the network, locate developments near to transport hubs, improve access to jobs and services by walking, cycling and public transport routes

#### ***Theme: Safer and Healthier County***

Objectives: Safer roads, protecting communities, active transport, secure network

Transport Objectives: reduce the number of casualties on the transport network, encourage more physically active transport, reduce crime and fear of anti-social behaviour on the transport network

#### ***Theme: Supporting Independence***

Objective: improve access by an integrate public transport, walking and cycling, reduce the barriers to transport

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<sup>9</sup> Kent County Council (2011) *Local Transport Plan for Kent 2011-16*.

***Theme: Tackling Climate Change***

Objective: Reducing emissions, smarter travel

Transport Objective: reduce traffic levels, improve carbon efficiency of current forms of transport, reduce the need to travel, encourage the use of more sustainable transport

***Theme: Enjoying Life in Kent***

Objective: access, enjoying the journey, sociable streets

Transport Objectives: improve the journey experience; reduce the level of pollution from traffic, enhance well-being and sense of community

**INTEGRATED TRANSPORT STRATEGY FOR KENT**

Produced in 2009, the Kent Transport Strategy *Growth without Gridlock* was redrafted in 2010 in order to take account of the emerging Environment and Housing Strategies, and developed into a 20 year Transport Delivery Plan for Kent, *Growth without Gridlock*.

The document provides strategies for the whole of Kent, but also some which are directly aimed at transport improvement in the Gravesham Borough.

Kent wide policies from the Integrated Transport Strategy include the following options for controlling local roads:

- Reallocation of Road Space – to allow more sustainable travel road space to be reallocated to car sharers and bus transit systems.
- Red Routes – status assigned to certain roads during peak periods to reduce loading and parking. The aim of this is to minimise delays on such routes.

Together with improving the road network Kent County Council have suggested schemes which aim to reduce the travel demand. Such schemes included in the Integrated Transport Strategy include:

- Land-use planning
- Mixed use developments

- Park and ride schemes
- Variable parking charges
- Teleworking and broadband access
- Promotion of travel plans for both schools and workplaces
- Improvements to public rights of way and walking/cycling routes
- Improvements in interchanges and travel information

To reduce the pollution from vehicles KCC have suggested the following schemes:

- Low emission zones – this strategy includes charging high emission vehicles during peak periods in urban centres.
- KCC have proposed that they will work with bus operators and taxi firms to bring forward the use of fuel efficient and low emission buses.

Kent County Council has proposed several improvements to the current bus network in order to improve connectivity and promote the use of public transport. The following improvements have been outlined:

- Fastrack bus networks to improve longer bus journeys across the county
- Inter-urban coach service – to give all towns direct access to public transport
- Local Bus Services – these will operate into the local communities with links to the inter-urban and the Fastrack systems
- Improvement to the rural bus network through rural interchange system

## **INTEGRATED TRANSPORT PROGRAMME FOR ASHFORD**

The major proposals include:

- Urban Traffic Management and Control (UTMC) system to cover the Ashford area;
- Improvements to local bus services as a first stage to implementation of the Smartlink bus service after 2015. These will include bus priority measures in the town centre and improved access and information.

- M20 Junction 10A: new junction on M20 to provide the highway capacity to serve and support the new development sites to the south and east of Ashford. The scheme is considered in the National Roads programme, however has been deferred until at least post 2015.
- Ashford International Station Improvements. The scheme includes a revitalised bus and taxi interchange, extensive cycle parking and the provision of additional seating and landscaping. Ridham Dock bikes are also available at the station now.
- Smartlink Bus Rapid Transit (BRT) scheme. The service will benefit from dedicated bus priority measures and will link the town centre to the new development and park and ride sites, as well as existing communities. The Department for Transport has confirmed that the scheme will not be considered for funding until 2015 at the earliest.
- A28 Chart Road Phases 1-3: Proposed dualling of the existing road.

## 8 Climate Change Strategies

With respect to transport emissions, the Kent County Transport Strategy “Growth without Gridlock” (2010) contains a number of strategies aimed at dealing with the issue of Climate Change. These include:

- Providing alternative forms of transport, such as walking and cycling networks together with cycle hire;
- Promoting school and workplace travel plans;
- Encouraging vehicle fleet and taxi companies to use low emission vehicles;
- Encouraging local businesses and retailers to work in partnership to co-ordinate deliveries;
- Reducing the need to travel through land use planning.

The Government is committed to reducing the carbon impact and increasing sustainable transport choices. The Local Transport Plan will build on existing principles in the Kent context.

The Third Kent County Council Local Transport Plan 2011 – 2016 lists Climate Change as one of its five key themes with objectives including the following:

- Reduce traffic levels;
- Improve carbon efficiency of current forms of transport;
- Reduce the need to travel;
- Encourage the use of more sustainable transport.

During 2010-11 the Council gained accreditation on the Carbon Trust’s Local Authority Carbon Management Programme and developed a Carbon Management Plan aimed at increasing the energy efficiency of the Council’s estate. The Council has committed to reducing the energy use within its estate by 30% by 2015.

In January 2013 the Council issued its second Climate Change and Sustainable Environment Position Statement, which sets out Ashford Council's aims with regards to reducing CO<sub>2</sub> emissions, promoting sustainable environment and mitigating the impacts of energy costs. The Statement also supports the Local Government Association (LGA) Climate Local initiative where it is relevant to Ashford:

- In adherence with its Carbon Management Plan, the Council will continue working towards reducing emissions of its own operations and services, and continue actively supporting and leading on carbon reductions in the community;
- The Council will set out its commitment in the Position Statement and continue using targets and action plans of the Kent Environment Strategy to monitor and demonstrate its achievements;
- The Council will work with Kent Partners, such as the Environment Task Group, to deliver Climate Local, and will use these partnerships to share with other councils and national partners.

The Climate Change Position Statement gives account of the progress since the first Position Statement and plans for future work.

### ***Progress to date***

- The Sustainable Design & Construction SPD (2012) promotes sustainable use of natural resources and reducing environmental impacts of development. Ashford is on target to meet its 20% reduction in CO<sub>2</sub> emissions from its housing stock by 2013;
- For Urban Extensions & Greenfield Urban Sites, Code for Sustainable Homes level 4 is currently required as a minimum, sets Carbon reduction targets at 30%, above current building regulations, and developers must also include an on-site sustainable energy element. Where developers cannot meet these targets through on-site measures they will contribute to a carbon fund which will be used for retrofitting measures to reduce carbon emissions in existing properties.
- Photovoltaic panels have been installed on new social housing builds from 2011.

- The Council promotes energy efficiency through the Greenov project's retrofit initiatives. In 2010 Greenov funded a Savings at Home project which piloted water and energy retrofits in North Ashford homes.

### ***Future work***

- Reduce carbon emissions from Council's estate by 30% by 2015, in adherence to the Carbon Management Plan;
- Reduce Council members' and employees' need to travel, encourage the use of public transport, teleconferencing and other sustainable solutions;
- Implement renewable technology into the Three Year Maintenance Plan for Housing 2016-2019;
- Increase the proportion of goods and services sourced locally where there are environmental, employment, or Value for Money benefits, and in compliance with broader UK and EU purchasing legislation;
- Meet high standards of sustainable construction in any new Ashford Borough Council owned buildings, including refurbishments and social housing;
- Work towards a cut in emissions of 2.6% annually in Kent by 2020 which will see an overall reduction of 34% in emissions, as outlined in Climate Local (see Appendix B for targets), and towards the Governments UK target of 80% by 2050.
- Work with Kent Partners to set out and deliver a vision of climate change mitigation and adaptation with our partners on the Ashford Locality Board in line with Climate Local Kent;
- Work with parish councils and local groups to lead in the community, as expected through Climate Local and in accordance with the localism agenda;
- Continue to comply with all relevant Climate Change and Environmental legislation and statutory duties.

## **9 Implementation of Action Plans**

Ashford Borough Council has not declared any AQMAs. Therefore, there are no Air Quality Action Plans in place.



## **10 Conclusions and Proposed Actions**

### **10.1 Conclusions from New Monitoring Data**

The annual mean NO<sub>2</sub> objective was not exceeded at any of the diffusion tube sites in the Borough during 2012-2013.

### **10.2 Conclusions relating to New Local Developments**

Three new developments have been identified as having the potential to impact upon air quality in the Local Authority area:

- New retail store development at the land adjoining Fougères Way /Maidstone Road, Ashford
- New residential/commercial development at the Old Railway Works, Newtown Road, Ashford
- New biomass installation at the Godmersham Park House, Godmersham Park, Canterbury Road, Godmersham, Canterbury

These will be taken into consideration in the next Updating and Screening Assessment, scheduled for 2015.

### **10.3 Proposed Actions**

- Progress to the 2015 Updating Screening and Assessment.

## 11 References

- AEA (2008) *Diffusion Tubes for Ambient NO<sub>2</sub> Monitoring: Practical Guidance for Laboratories and Users*. Report to Defra and the Devolved Administrations.
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# Appendices

## Appendix A - QA:QC Data

### Diffusion Tube Bias Adjustment Factors

The diffusion tubes are supplied and analysed by Environmental Services Group (ESG) Didcot utilising the 50% triethanolamine (TEA) in acetone preparation method. A bias adjustment of 0.79 for the year 2012 (based on 39 studies) and 0.80 for the year 2013 (based on 28 studies) have been derived from the national bias adjustment calculator<sup>10</sup>. For 2011 data, the bias adjustment factor has been taken from the Council's previous LAQM annual report (2012 Updating and screening assessment).

### Discussion of Choice of Factor to Use

The national bias adjustment calculator has been used for bias adjustment of the 2012-2013 diffusion tube data as the Council stopped local continuous monitoring of nitrogen dioxide in 2011.

### QA/QC of Diffusion Tube Monitoring

ESG Didcot is a UKAS accredited laboratory and participates in the Workplace Analysis Scheme for Proficiency (WASP) for NO<sub>2</sub> diffusion tube analysis and the Annual Field Inter-Comparison Exercise. These provide strict performance criteria for participating laboratories to meet, thereby ensuring NO<sub>2</sub> concentrations reported are of a high calibre. The lab follows the procedures set out in the Harmonisation Practical Guidance. In the latest available WASP results, rounds 116 through to 123 (January 2012 to December 2013) ESG Didcot have scored 100%. The percentage score reflects the results deemed to be satisfactory based upon the z-score of  $< \pm 2$ . Based on 39 studies, 79% in 2012 (and, based on 28 studies, 79% in 2013) of all local Authority co-location studies were rated as 'good' (tubes are considered to have "good" precision where the coefficient of variation of duplicate or triplicate diffusion tubes for eight or more periods during the year is less than 20%).

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<sup>10</sup> National Diffusion Tube Bias Adjustment Factor Spreadsheet, version 03/14 published in March 2014.

## Appendix B – Monitoring Data

2013

Site Name	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	COUNT	% Data Capture	AVERAGE	BIAS ADJUSTED
AS03	38.2	29.6	31.8	22.0	18.5	18.5	20.8	19.0	27.5	26.9	33.2	24.5	12	100.0	25.9	20.7
AS04	35.5	24.4	27.7	19.7	16.2	15.6	17.5	17.0	24.5	21.8	27.7	22.3	12	100.0	22.5	18.0
AS06		49.7	49.9	40.3	29.8	36.0	33.7	46.1	46.3	36.7	54.7	34.6	11	91.7	41.6	33.3
AS07	45.2	39.6	42.7	27.7	25.7	23.9	27.4	26.3	38.2		36.2	28.0	11	91.7	32.8	26.2
AS14	40.4	45.1	50.6	32.9	27.8	28.5		25.9	34.6	25.5	38.8	25.4	11	91.7	34.1	27.3
AS15	48.2	38.0	32.0	35.3	40.4	29.6	37.9	45.4	40.6	45.4	44.3	50.6	12	100.0	40.6	32.5
AS18	54.2	45.5	44.5	31.9	34.0	34.3	32.6	35.9	40.3	38.2	47.9	36.8	12	100.0	39.7	31.7
AS21	46.3	34.4	34.5	26.2	22.8	20.2	22.3	27.4	30.4	33.2	38.6	28.1	12	100.0	30.4	24.3
AS22	39.3	41.7	38.5	37.1	38.9	36.6	31.3	38.7	40.7	47.0	49.2	35.1	12	100.0	39.5	31.6
AS23	49.2	28.1	26.9	21.5	17.2	16.1	14.5	15.2	25.1	28.1	32.8	24.5	12	100.0	24.9	19.9
AS24	35.0	34.4	31.0	14.9	22.7	22.4	18.9	23.4	30.8	33.6	38.3	29.2	12	100.0	27.9	22.3
AS25	29.8		29.5	23.9	23.2	21.0	18.5	21.4	28.4	30.8	33.3		10	83.3	26.0	20.8
AS26	45.1	45.1	41.9	36.4	32.2	31.7	34.3	31.3	43.3	51.7	55.6	46.7	12	100.0	41.3	33.0
AS27	29.3	32.7	41.2	23.2	19.6	20.3	21.9	18.0	30.1	20.2	33.8	28.1	12	100.0	26.5	21.2
AS28	43.6	21.6	21.2	16.8	11.2	11.0	12.5	12.3	16.7	17.2	20.5	14.6	12	100.0	18.3	14.6
AS29	47.4	24.6	25.1	24.8	13.0	14.7	17.1	12.0	21.2	19.3	23.3	18.9	12	100.0	21.8	17.4

2012

Site Name	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	COUNT	% Data Capture	AVERAGE	BIAS ADJUSTED
AS03	33.5	35.2	36.2	23.9	22.6	16.5	13.9	18.5	19.1	25.5	29.5	29.2	12	100.0	25.3	20.0
AS04	30.6	31.7	31.4	20.2	19.4	20.3	12.4	17.4	27.1	22.5	22.8	29.4	12	100.0	23.8	18.8
AS06	55.7	51.2	49.9	39.5	37.3	31.0	25.0	24.1	35.3	41.9	37.8	43.5	12	100.0	39.4	31.1
AS07	35.3	39.8	38.1	25.9	32.1	23.2	21.1	27.3	19.9	34.6	42.9	33.4	12	100.0	31.1	24.6
AS14	37.1	41.2	43.5	31.7	34.8	22.1		18.5	25.8	31.3	35.5	38.8	11	91.7	32.8	25.9
AS15	54.3	50.3	48.5	46.1	40.6	41.8	44.5	58.9	48.5	51.5	47.2	53.7	12	100.0	48.8	38.6
AS18	49.0	45.2	45.0	36.6	34.9	23.0	23.0	24.0	35.6	37.3	44.1	45.1	12	100.0	36.9	29.2
AS21	34.3	39.2	37.7	25.4	25.1	19.1	17.8	22.7	25.5	32.3	36.8	35.8	12	100.0	29.3	23.2
AS22	49.5	53.5	47.6	40.5	36.1	27.0	30.8	33.1	42.5	41.7	36.2	51.6	12	100.0	40.8	32.3
AS23	32.8	34.6	31.4	21.8	17.6	13.4	12.5	18.5	18.5	23.3	33.1	35.7	12	100.0	24.4	19.3
AS24	39.4	37.1	37.6	26.1	25.4		14.7	20.5	23.2	29.5	29.9	40.1	11	91.7	29.4	23.2
AS25		37.5	33.5	24.8		19.5		26.4	22.9	30.5	18.8	38.8	9	75.0	28.1	22.2
AS26	48.7	48.5	41.0	41.6		29.5	27.7	33.9	43.4	40.1	21.5	48.8	11	91.7	38.6	30.5
AS27	29.3	37.1	34.8	24.2	21.2	14.8		19.2	19.8	28.3	30.5	36.9	11	91.7	26.9	21.3
AS28	17.3	23.5	19.9	11.8	12.0	11.1	12.1		11.6	20.3	34.5		10	83.3	17.4	13.8
AS29	25.2	25.9	27.0	14.1	15.2	16.1	10.6	14.9	14.2	18.3	47.4	20.0	12	100.0	20.7	16.4