

Air Quality Action Plan 2016

Suggested amendment to section **2.3 Traffic Management** second paragraph :

“In 2012, ECC commissioned consultants Jacobs[9] to undertake a Nitrogen Dioxide Dispersion Modelling Report for which modelling of air quality was carried out to assess the effects of the then emerging UDC Local Plan developments on NO₂ concentrations at four key junctions within the town. The modelled NO₂ levels were adjusted to correct them against measured levels following a method set out in Defra technical guidance TG(09), and for future predictions a further adjustment was undertaken for Long Term air quality trends (LTT) to take account of emissions not decreasing as expected. Five scenarios of development, opening year and junction improvement mitigation were modelled and for the scenario of full Draft Local Plan development and junction improvements in 2026, using the TG(09) adjustment, no junction modelled showed residential accommodation where there would be exceedances of the annual mean AQO for NO₂. The LTT adjustment predicted a number of properties would be significantly impacted, the majority associated with the High St/George St junction. After 2015, actual future year concentrations would be expected to fall somewhere between the calculated results for the two methods”

The amendment of the final line is suggested to remove the reference to improvements with the introduction of Euro6/VI compliant vehicles, which could be misleading in the light of comments under section 1.2 on the recently discovered failure of Euro 6 vehicles to deliver the expected emission reductions during on road driving conditions rather than under laboratory testing conditions.

The predictions for NO₂ reduction using the TG(09) method were acknowledged to be overly optimistic at the time of the Jacobs report and the likely impacts of Euro 6/VI vehicles on air quality are still yet to be fully understood. However the LTT adjustments were acknowledged in the report to be overly conservative , notably from 2018 -2026, following the gradual introduction of Euro6/VI vehicles compliant during on road driving conditions.