Communities and Environment Scrutiny Select Committee

05 November 2025

Part 1 - Public

Matters for Cabinet - Non-key Decision

Cabinet Member	Robin Betts, Cabinet Member for Housing, Environment and Economy
Responsible Officer	Eleanor Hoyle, Director of Planning, Housing and Environmental Health
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Air Quality Monitoring Updates and Air Quality Management Area Recommendations

1 Summary and Purpose of Report

1.1 In line with statutory duties monitoring of Air Quality (AQ) has continued in the Borough and our Annual Status Report 2025 submitted to DEFRA earlier this year has been appraised and approved. Based on the evidence we are able to recommend in this report, revocation of four of the five remaining Air Quality Management Areas (AQMAs) at Tonbridge High Street, Larkfield, Aylesford and Borough Green.

2 Corporate Strategy Priority Area

2.1 Sustaining a borough which cares for the environment.

2.2 The Council has a duty to monitor and tackle air pollution. The Council has previously declared AQMAs and has an Air Quality Action Plan (AQAP) in place to reduce air pollution at those sites and across the borough.

3 Recommendations

3.1 That Members **RECOMMEND** to Cabinet to note the improvement in air quality over the last four years and agree the revocation of the Tonbridge High Street, Larkfield, Aylesford and Borough Green Air Quality Management Areas.

3.2 That Members **RECOMMEND** to Cabinet the continuation of air quality monitoring across the borough including to respond to any specific areas of concern.

4 Introduction and Background

4.1 Part IV of the Environment Act 1995 as amended by the Environment Act 2021 forms part of the legislation that Local Authorities have a duty to comply with to monitor and tackle air pollution. The Local Air Quality Management (LAQM) Technical Guidance 2022 document (TG22) provides the current statutory guidance as to how LAs should comply with this legislation.

4.2 To add additional context, it is also a statutory requirement for Councils to submit an Annual Status Report (ASR) on air quality monitoring to the Department for Environment, Food & Rural Affairs (DEFRA) by 30 June each year. This ASR details monitoring results for the preceding calendar year, as well as detailing current and future actions on AQ. Each ASR is appraised by DEFRA. Our 2025 ASR is available on our website (TMBC air quality report 2025). DEFRAs appraisal of this report can be seen in **Annex 1**.

4.3 TG22, section 3.57 states that the revocation of AQMA status should be considered following three consecutive years of compliance with the air quality objective for which the AQMA was declared, as evidenced through monitoring. In Tonbridge and Malling all of our five current AQMAs are declared for exceedances of the Nitrogen Dioxide (NO_2) annual mean objective of 40 µg/m3.

4.4 Where monitoring is completed using diffusion tubes, it is recommended that revocation of AQMA status should be considered following three consecutive years of annual mean NO_2 concentrations being lower than 36 µg/m^3 (i.e. within 10 % of the annual mean NO_2 objective). There should not be any declared AQMAs for which compliance with the relevant objective has been achieved for a consecutive five-year period.

4.5 TG22 refers to covid years (2020 & 2021) in section 3.54 and says that where covid years form part of the consecutive years of compliance AQMAs may still be considered for revocation particularly where a downward trend in pollution levels was already evident.

4.6 Members will recall the report in May 2024 which suggested that should final results for 2024 be conducive the revocation of four of the remaining five AQMAs could be considered. With our 2025 ASR now satisfactorily appraised by DEFRA, we are able to make such recommendations.

5 AQMA Status and Recommendations

5.1 Tonbridge High Street AQMA, Tonbridge High Street between Vale Road and The Botany

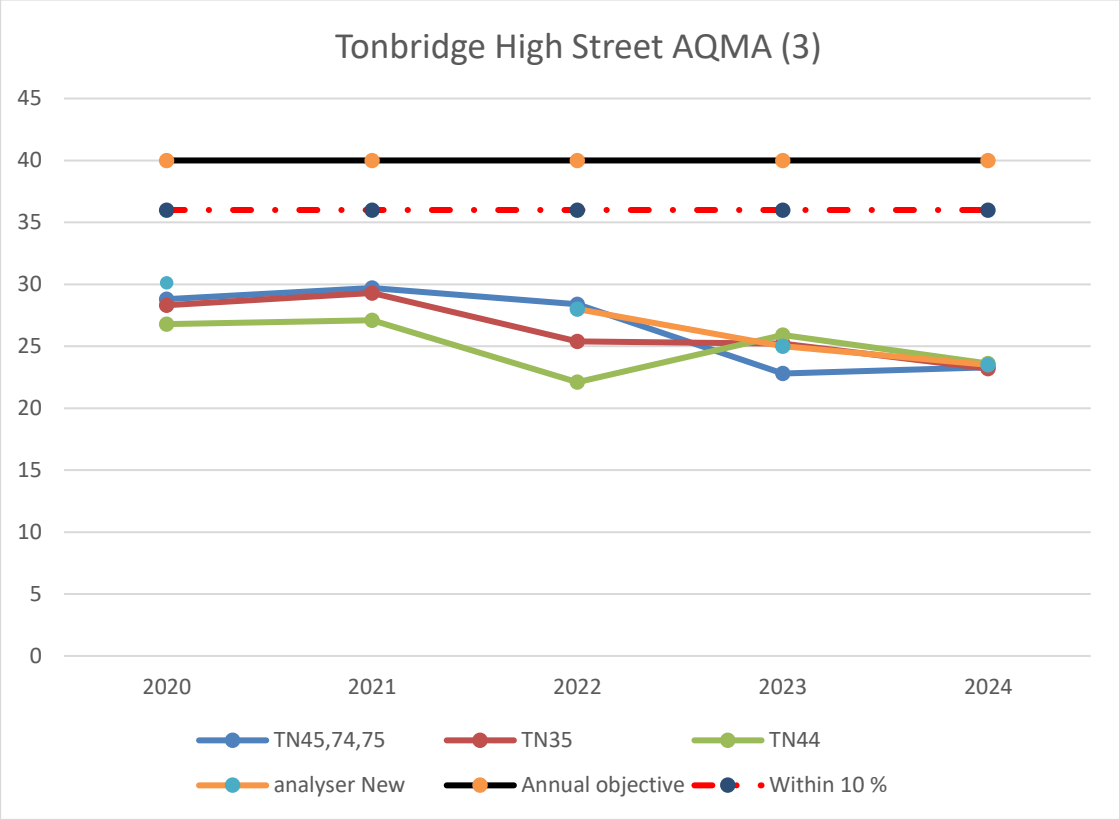
5.1.1 The diffusion tubes results within the AQMA as shown in Figure 1, have not been within 10 % of the Nitrogen Dioxide annual objective for the last five years and

pollution levels at these sites were in decline pre covid. Results for 2024 continue to show a level at least 15µg/m^3 below the annual objective.

5.1.2 The reasons for this improvement in AQ are likely linked to the effects of increased flexible working/working from home which has remained popular post covid. In addition, cars/vans and lorries continue to evolve with increased up take of Hybrid or full electric cars which produce either significantly reduced or zero NO_2 emissions. This is particularly true of hybrid cars when operating in stop start town centre locations. Our significant increase in the number of destination and fast chargers particularly in Tonbridge town centre in line with our AQAP will have helped with this uptake in such cars.

5.1.3 The continuous analyser located in 'The Works' storeroom which began monitoring in 2022 has consistently recorded well under the annual objective and has not come close to any exceedance of the hourly mean objective. Based on these results, and in line with TG22 it is recommended that this AQMA be revoked. This position is supported by DEFRA as referenced in Paragraph 6 of their ASR appraisal (Annex 1).

Figure 1, results within the Tonbridge High Street AQMA

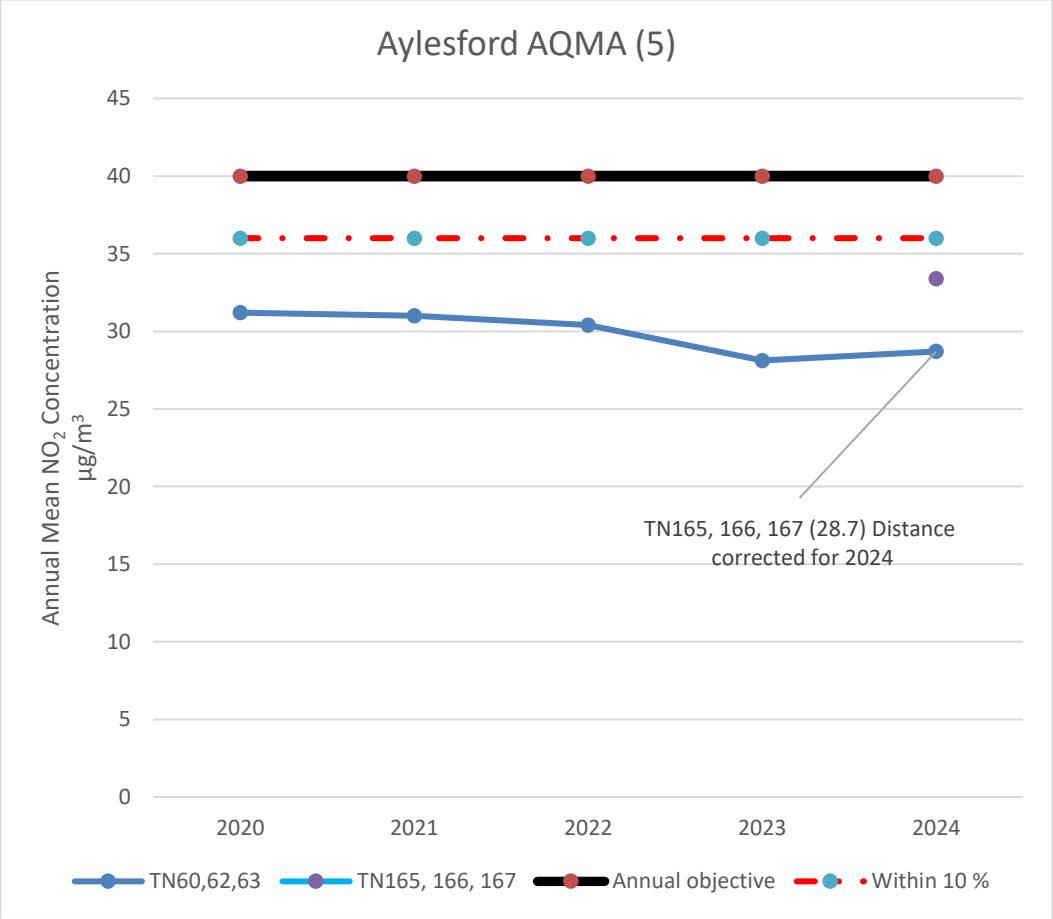


5.2 Aylesford AQMA, A20/Hall Road/Mills Road Crossroads

5.2.1 The triplicate diffusion tube at this site had to be moved in 2024 from the façade of the closest sensitive receptor due to access issues. However, the triplicate was relocated to the lamppost directly outside the property, adjacent to the crossroads. Even though it is now closer to the roadway, the result (as shown by the single dark blue dot in Figure 2) still recorded under 36µg/m^3. With an approved distance correction method applied the result at the sensitive receptor recorded well under the annual objective for the fifth consecutive year. In line with TG22 it is recommended that this AQMA be revoked. This position is supported by DEFRA as referenced in Paragraph 6 of their ASR appraisal (Annex 1).

5.2.2 The reasons for this improvement in AQ are likely linked to the effects of increased flexible working/working from home which has remained popular post covid. In addition, cars vans and lorries continue to evolve with increased up take of Hybrid or full electric vehicles and even where full petrol and diesel vehicles are still used, most are new enough to fully comply with the most stringent Euro Emission Standards (Euro 6).

Figure 2, result within the Aylesford AQMA

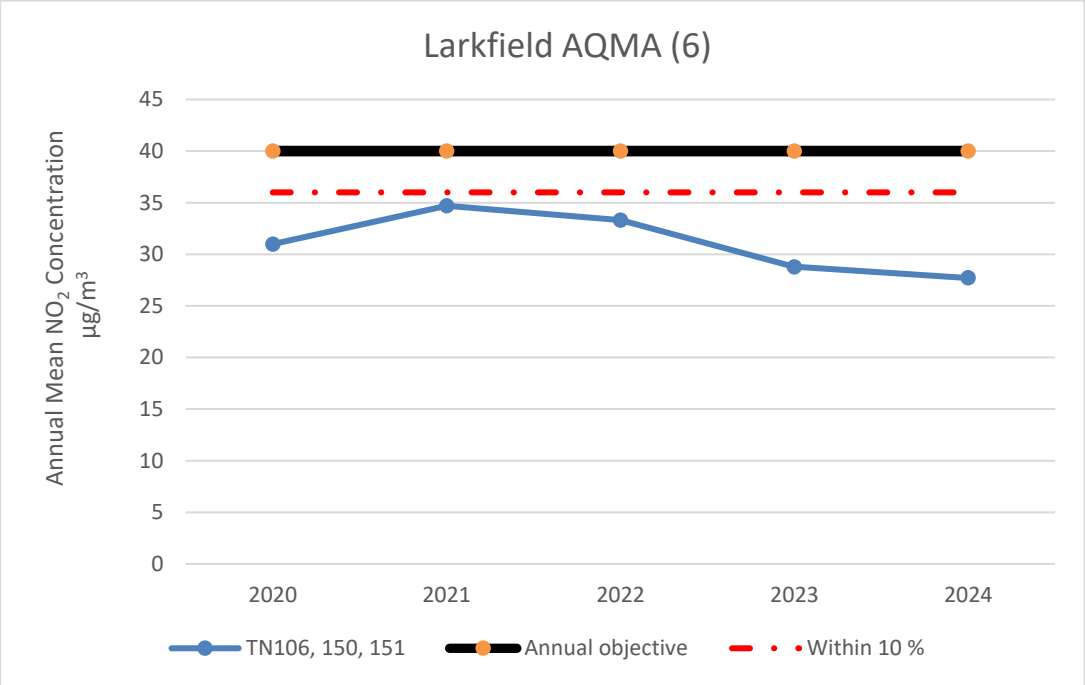


5.3 Larkfield AQMA
A20/New Hythe Lane Junction

5.3.1 This AQMA is also monitored by a triplicate diffusion tube site as shown in Figure 3. It has recorded under the 40µg/m^3 threshold for at least five years. Although closer to that threshold than other AQMAs it is compliant with revocation criteria and has shown a consistent downward trend over the last four years. In line with TG22 it is recommended that this AQMA be revoked. This position is supported by DEFRA as referenced in Paragraph 6 of their ASR appraisal (Annex 1).

5.3.2 The reasons for improvement in AQ at this location will be similar to those given in 5.1.2 and 5.2.2. This location has also benefited from a reworking of the junction by KCC highways as recommended in our AQAP, reducing queuing and potential pollution from idling vehicles.

Figure 3, result within the Larkfield AQMA



5.4 Borough Green AQMA
Junction of Sevenoaks Road and Western Road

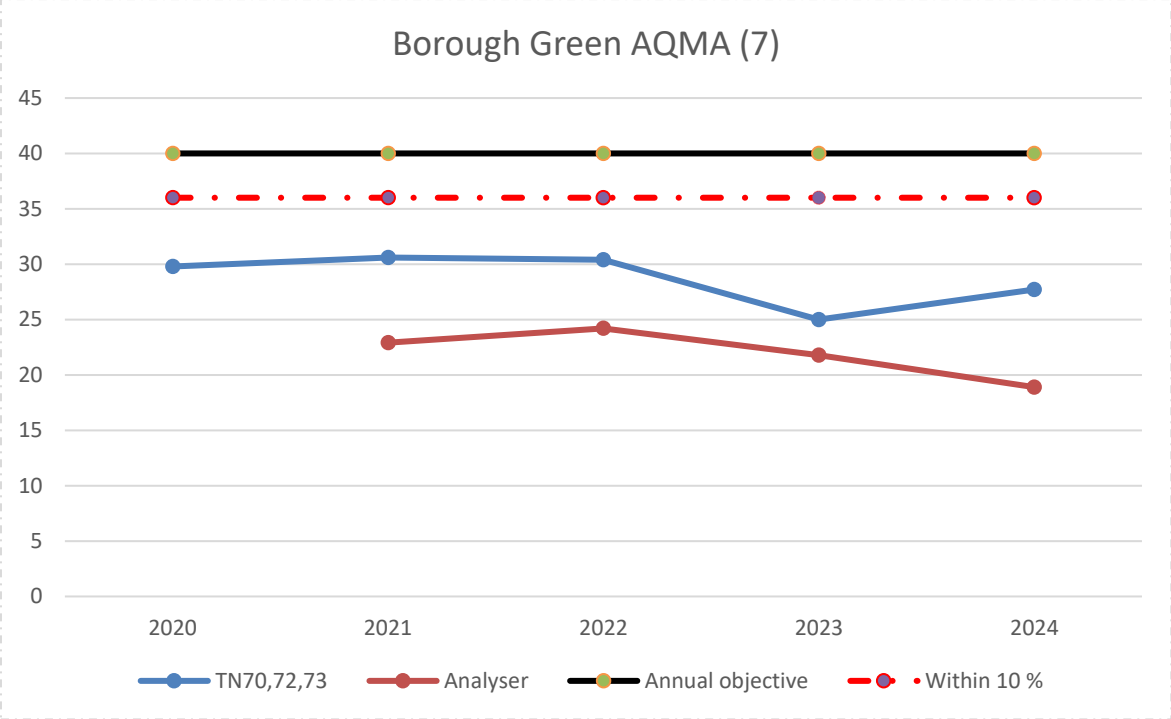
5.4.1 This AQMA is served by a triplicate diffusion tube site, and a continuous analyser which went online in mid-2021. Currently both results sit well under the NO_2 annual mean 40µg/m^3 threshold as shown in Figure 4. Although diffusion tube results increased slightly in 2024, continuous monitoring showed a slight decrease. In the circumstances with calibration and certification requirements for continuous analysers it would be appropriate to place more faith in that result. Either way results have been under the annual objective for at least five years,

and it is recommended that this AQMA be revoked in line with TG22. This position is supported by DEFRA as referenced in Paragraph 6 of their ASR appraisal (Annex 1).

5.4.2 Reasons for the improvement in AQ at this site will follow the same pattern as mentioned in 5.1.2 and 5.2.2

For clarity there is also a particulate monitor co located with the continuous NO_2 analyser. However, the existing AQMA was not declared for exceedances of the particulate objectives, and monitoring to date indicates that any such declaration is unlikely.

Figure 4, results within the Borough Green AQMA



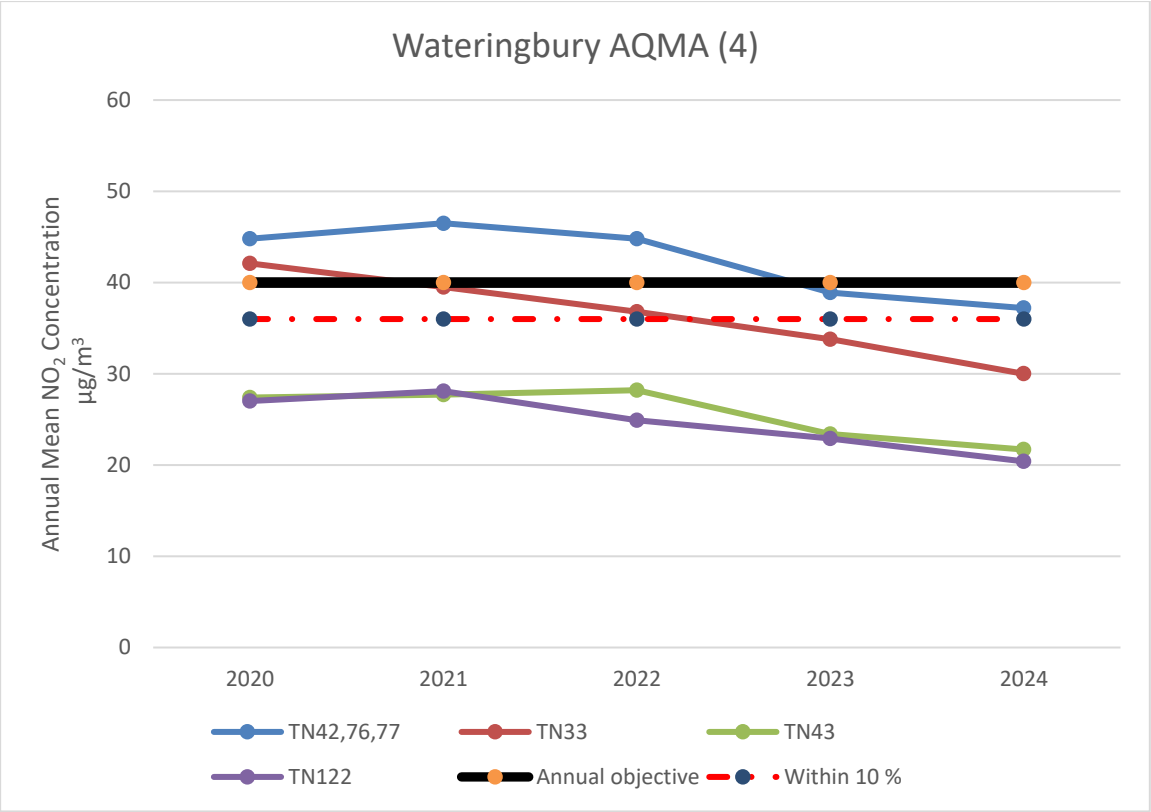
5.5 Wateringbury AQMA
Wateringbury Crossroads A26/Bow Road/Red Hill

5.5.1 Wateringbury continues to be our only AQMA where diffusion tube monitoring remains within 10% of the Annual objective (although there has been no exceedance of the 40µg/m3 threshold for the past two years). NO_2 levels have been declining since before Covid, however this site has always recorded our highest levels in the Borough, so a more significant reduction has been required. If rates of reduction remain the same, it is predicted to be around 5 years before this AQMA could be revoked given the criteria in TG22.

5.5.2 Part of the reason for the continuing challenges at Wateringbury is its crossroads location on the main route between Tonbridge and Maidstone. The crossroads is

significantly constrained by the built environment and KCC Highways have been unable to secure suitable adjustments which may aid the situation. Existing improvements in AQ in recent years will therefore likely be due to those reasons already given for other AQMAs where full compliance has been achieved.

Figure 5, results within the Wateringbury AQMA



6 Proposal

6.1 The Tonbridge High Street, Larkfield, Aylesford and Borough Green AQMAs should be revoked as they meet the criteria in TG22 for AQMA revocation. This position is supported by DEFRA as referenced in Paragraph 6 of their ASR appraisal (Annex 1).

6.2 The Wateringbury AQMA is unlikely to meet the revocation criteria in the near future and will be TMBC's sole AQMA if other AQMAs mentioned in 6.1 are revoked.

6.3 AQ monitoring across the borough will continue in line with our statutory requirements to do so, with the flexibility to move monitoring sites currently outside of AQMAs as appropriate.

6.4 Monitoring in some form within the areas of the AQMAs to be revoked will continue, to keep air quality under review in known hotspots.

6.5 As per guidance in TG22 a new AQMA can be declared if pollution exceeds the relevant objective levels.

7 Other Options

7.1 There is no other realistic option. If the AQMA areas identified are not revoked the Council may be subject to formal censure by DEFRA.

8 Financial and Value for Money Considerations

8.1 The costs incurred in carrying out our current level of air quality monitoring are budgeted for. There is no direct cost associated with the revocation of AQMAs.

9 Risk Assessment

9.1 The main risk arising is the non-compliance with statutory guidance where AQMAs are kept in force despite monitoring showing they should be revoked. This may result in censure by DEFRA.

10 Legal Implications

10.1 The process for air quality monitoring, and the declaration/revocation of AQMAs are laid out in Statutory Guidance to which the Council must adhere.

11 Consultation and Communications

11.1 DEFRA have been advised of our proposed actions through the ASR and are in agreement, as referenced in Paragraph 6 of their ASR appraisal (Annex 1). There is no legal requirement for a public consultation on this matter. Should the recommendations be carried, DEFRA will be formally notified and the revocations formally ratified.

12 Implementation

12.1 Should the recommendations be carried, DEFRA will be formally notified and the revocations formally ratified.

13 Cross Cutting Issues

13.1 Climate Change and Biodiversity

13.1.1 Significant impact on reducing emissions in support of carbon neutral by 2030 or enhancing the natural environment.

13.1.2 Climate change advice has not been sought in the preparation of the options and recommendations in this report.

13.2 Equalities and Diversity

13.2.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

13.3 Other If Relevant

- Healthy Lifestyles – good air quality has a positive impact on enabling residents to lead a healthy lifestyle.

Background Papers	None
Annexes	1 – DEFRA appraisal of the Air Quality Annual Status report