Local Authority:	**Tonbridge and Malling Borough Council**
Reference:	**ASR25-2654**
Date of issue	**July 2025**

Annual Status Report Appraisal Report

The Annual Status Report sets out new information on air quality obtained by Tonbridge and Malling Borough Council (TMBC) as part of the Review & Assessment process required under the Environment Act 1995 (as amended by the Environment Act 2021) and subsequent Regulations.

TMBC currently have five Air Quality Management Areas (AQMAs) declared within their jurisdiction, all of which have been designated for exceedances of the NO_2 annual mean objective.

The AQMAs within the borough are as follows:

- AQMA 3 – Tonbridge High Street;
- AQMA 4 – Wateringbury;
- AQMA 5 – Aylesford;
- AQMA 6 – Larkfield; and
- AQMA 7 – Borough Green.

All AQMAs were compliant with the 40µg/m^3 limit in 2024, with air quality across most AQMAs and monitoring sites showed only slight reductions compared to previous years. The Council intends to revoke all remaining AQMAs except for Wateringbury (AQMA 4). Councillors will be asked to approve the revocation of AQMAs in Tonbridge (AQMA 3), Aylesford (AQMA 5), Larkfield (AQMA 6), and Borough Green (AQMA 7), as these areas now meet the revocation criteria outlined in Technical Guidance TG (22).

The revocation of an AQMA should be considered following three consecutive years of compliance with the relevant objective as evidenced through monitoring. Where there have been no exceedances for the past five years, local authorities must proceed with plans to revoke the AQMA. The LAQM Technical Guidance 2022 is clear in this respect (Point 3.57, page 50).

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Please be aware that unless a likely exceedance has been identified in the area, Defra will not appraise AQAPs for AQMAs that have complied for five years. Local Authorities will instead be advised to revoke the AQMA.

AQMAs should identify areas where air quality objectives are not being met or are likely to be at risk of not meeting them. Keeping AQMAs in place longer than required risks diluting their meaning and impacting public trust in LAQM.

Local authorities that do not have an AQMA should continue to monitor for exceedances and should still have a local Air Quality Strategy in place to ensure air quality remains a high-profile issue, thereby enabling a quick response should there be any deterioration in condition.

See LAQM Statutory Policy and Technical Guidance 2022 for more information, as well as FAQ 142: Three or more years of compliance with air quality objectives.

Automatic monitoring of NO_2 was undertaken at two sites in 2024, Borough Green (ZT8) and Tonbridge High Street (ZT9). PM_{10} was also monitored at ZT8. No exceedances of the short- or long-term objective values for NO_2 and PM_{10} were recorded in 2024. PM_{10} concentrations exceeded the 24-hour mean threshold of 50 µg/m³ on six occasions in 2024. However, this remains well within the legally permitted limit of 35 exceedances per year.

Non-automatic (passive) monitoring was conducted via a network of 37 monitoring locations, including ten triplicate locations. There were no recorded exceedances of the annual mean objective for NO_2 during 2024, with a maximum annual mean NO_2 concentration of 37.2 µg/m^3 recorded at triplicate site (TN42, TN76 and TN77) - located within the Wateringbury AQMA. This concentration, being within 10% of the objective value, should not be considered compliant for the purpose of revocation as per paragraph 3.61 of TG.22. The annual mean NO_2 concentration did not exceed 60 µg/m^3 at any non-automatic monitoring site, and therefore exceedances of the 1-hour mean objective are unlikely at any monitoring location in 2024.

QA/QC of monitoring data has been discussed, and the national bias adjustment factor of 0.80 was selected for 2024 taken from 3/25 version of the national spreadsheet. The justification for the selection of the adjustment factor in 2024 is supported, a review of the diffusion tube locations to enable a local bias adjustment factor to be calculated is continuing. The council is encouraged

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to calculate a local bias adjustment factor in future ASRs. All monitoring was completed in adherence with the 2024 Diffusion Tube Monitoring Calendar.

Annualisation was required for one monitoring location, TN164, for 2024 whilst no sites required distance correction. The Council have provided good mapping of all monitoring locations within the district.

TMBC have highlighted three key measures in yellow in Table 2.2. These measures will be fed into UK-AIR to raise awareness amongst local communities of local authority action to improve air quality. These key measures are:

1. Traffic Management: Create Anti-idling zone at Tonbridge taxi rank Develop and enforce a borough wide anti-idling campaign.

2. Transport Planning and Infrastructure: Installation of electric charging points within Council car parks throughout the borough.

3. Alternatives to private vehicle use: Pilot a Car Club within the Council for individuals use in local communities.

On the basis of the evidence provided by the local authority the conclusions reached in the report are **accepted** for all sources and pollutants, on the proviso that the grammatical and formatting errors in the report are corrected prior to publication on the council's website. ASRs are public facing documents that serve to keep local communities informed of the steps being taken by their local authority to improve air quality, and as such it is important that they are accessible and easy to read. Following the completion of this report, TMBC should proceed with the revocations mentioned as soon as possible, and submit an Annual Status Report in 2026.

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Commentary

The report is well structured, detailed, and provides the information specified in the Guidance. The following comments are designed to help inform future reports:

1. Contrary to Table 2.1, the annual mean NO_2 concentration of 37.2 µg/m^3 recorded at triplicate site (TN42, TN76 and TN77) - located within the Wateringbury AQMA, being within 10% of the objective value, should not be considered compliant for the purpose of revocation as per paragraph 3.61 of TG.22.

2. Comprehensive trend graphs and analysis have been included for all monitoring data, including diffusion tube results, which is commendable.

3. It should be clarified whether the triplicate site TN165-167 is co-located with a continuous analyser as indicated in Table A.2. If so, the Council is encouraged to consider using this to allow for the calculation of a local bias adjustment factor, potentially improving the accuracy and robustness of the diffusion tube data. The data for said continuous analyser should also be included in the report. If not, then the table should be updated.

4. The Council have provided good mapping of all monitoring locations within the district. However, the Council are encouraged to update some of the labels and provide a map key in Figure D1-D6 to improve readability and understanding.

5. A few minor formatting inconsistencies were identified throughout the report and should be addressed to improve clarity and presentation. These include:
   - Table 2.2 (Progress on Measures to Improve Air Quality): An extra row has been included and could be removed.
   - Line Spacing: Inconsistent line spacing appears in several sections of the report and could be standardised for improved readability.
   - Table B.1 (NO_2 2024 Diffusion Tube Results): The bias adjustment factor is incorrectly listed as 8.0; the correct value is 0.80.
   - Table C.1 (Annualisation Summary): The use of a red outline is inconsistent with the formatting used elsewhere in the report and could be amended for consistency.

6. It is a positive development that the Council intends to propose the revocation of all remaining AQMAs in 2025, except for Wateringbury (AQMA 4), reflecting continued improvements in local air quality. This position is supported by Defra.

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7. Once revocation has been completed, it is recommended the AQAP measures are reviewed and if necessary updated for their specificity to AQMA 4, and reported within the next ASR.

This commentary is not designed to deal with every aspect of the report. It highlights a number of issues that should help the local authority either in completing the Annual Status Report adequately (if required) or in carrying out future Review & Assessment work.

Issues specifically related to this appraisal can be followed up by returning the attached comment form to Defra, Welsh Government, Scottish Government or DOE.

For any other queries please contact the Local Air Quality Management Helpdesk:
Telephone: 0800 0327 953
Email: LAQMHelpdesk@bureauveritas.com

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Appraisal Response Comment Form

Contact Name:	
Contact Telephone number:	
Contact email address:	UKLAQMAppraisals@aecom.com

Comments on appraisal/Further information: