Annual Status Report Appraisal Report

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

CBC currently have one Air Quality Management Area (AQMA) declared for exceedances of the NO2 annual mean air quality objective (AQO). The Cheltenham Borough Council AQMA 2020 was declared in 2020 following the revocation of the borough-wide AQMA and is described as ‘an area including properties with a façade fronting onto: High Street from Junction of Gloucester Road and Tewkesbury Road to Junction of Burton Street; Poole Way; and Swindon Road from junction of Poole Way to St Georges Street’.

CBC in 2024 recorded NO2 concentrations passively via a diffusion tube network of 44 sites including one triplicate site and automatically via a continuous analyser at CM1 (Swindon Road). All passive and automatic monitoring sites reported NO2 annual mean concentrations greater than 10% below the Air Quality Objective of 40 µg/m3 in 2024 (i.e. under 36 µg/m3). The maximum reported concentration within the Cheltenham Borough Council AQMA in 2024 was 30.4 µg/m3 at diffusion tube monitoring Site 5, which is a slight decrease from the 32.4 µg/m3 reported in the previous year. The maximum annual mean concentration reported within the AQMA has continued to fall each year from 36.0 µg/m3 in 2022 to 30.4 µg/m3 in 2024.

According to Section 3.61 of TG(22), the revocation of an AQMA should be considered following three consecutive years of annual mean NO2 concentrations being lower than 36 µg/m3 (i.e. within 10% of the annual mean NO2 objective). Therefore, despite the NO2 annual mean concentration in 2022 being 36.0 µg/m3, the downward trend in concentrations that has been observed demonstrates continued compliance with the objective. As a result, Cheltenham Borough Council are in the process of revoking the Cheltenham AQMA, a position Defra support.

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).

Please be aware that unless a likely exceedance has been identified in the area, Defra will not appraise AQAPs for AQMAs that have been in compliance 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](https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf) for more information, as well as [FAQ 142: Three or more years of compliance with air quality objectives](https://laqm.defra.gov.uk/faqs/faq-142-three-or-more-years-of-compliance-with-air-quality-objectives/).

Outside of the Cheltenham AQMA, the maximum NO2 annual mean concentration at a diffusion tube was 27.1 µg/m3, which is a reduction from the 29.8 µg/m3 recorded in 2023. Of the 40 sites that were part of the diffusion tube network in both 2023 and 2024, the NO2 annual mean concentration decreased at all sites except one (Site 13), where the concentration remained stable. This downward trend in NO2 annual mean concentrations observed across the entire diffusion tube network, highlights the improvement in the concentration of NO2 across Cheltenham during 2024. CM1 recorded an annual mean concentration of NO2 of 23.4 µg/m3 in 2024, which as observed in the diffusion tube network, is a year-on-year reduction in concentration since 2022 and is well below the annual mean AQO of 40 µg/m3. This indicates that the NO2 concentration in Cheltenham has improved during 2024, which positive.

The Council conducted an automatic (continuous) monitoring of PM10 and PM2.5 at CM2 (Gloucester Road) during 2024. CM2 recorded annual mean PM10 and PM2.5 concentrations of 15.1 µg/m3 and 8.7 µg/m3 respectively, both are below the respective AQOs. It is evident that the concentrations of PM10 and PM2.5 remain low in Cheltenham, and there has been an improvement in concentrations recorded in the first two years that the automatic monitoring station has been operational.

The diffusion tubes were supplied and analysed by Gradko International UKAS accredited laboratory, using the 20% TEA in water preparation method during the 2024 monitoring year. The laboratory participates in the AIR-Proficiency Testing (PT) scheme and it received a score of 100% – the percentage score reflects the results deemed satisfactory. Quality Assurance or Quality Control (QA/QC) of monitoring data has been discussed, with a local bias adjustment factor of 0.91 applied to the results, with appropriate calculations provided. One location required annualisation during 2024 (Diffusion Tube ID: 51) and no diffusion tube site within Cheltenham required distance correction during 2024. The Council have provided excellent mapping of all monitoring locations within the network.

During 2024, CBC completed several key measures relating to air quality. The top three of these include the following. These measures will be fed into UK-AIR to raise awareness amongst local communities of local authority action to improve air quality.

* Develop an Air Quality Strategy to replace the AQAP, following the revocation of the AQMA;
* Review boundaries of the smoke control areas (SCAs) and declare any new / amend existing boundaries as necessary;
* Promote anti-idling campaigns to reduce emissions from vehicle traffic.

Progress on further measures has been outlined in Table 2.3, providing good detail on specific actions taken forward as of April 2025. This includes setting a new and more ambitious local target for annual mean NO2, which may be included within the upcoming Air Quality Strategy.

Defra recommends that Directors of Public Health approve draft ASRs. Sign off is not a requirement, however collaboration and consultation with those who have responsibility for Public Health is expected to increase support for measures to improve air quality, with co-benefits for all. Please bear this in mind for the next annual reporting process.

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, Cheltenham Borough Council should continue with the revocation, publish the AQS once completed, and then submit an Annual Status Report in 2026.

**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. The Council have considered the comments made during the previous appraisal. This is commended and the Council are encouraged to continue this approach for future ASRs.
2. The Council have continued to provide clear evidence of several key actions to improve air quality which have been completed during the current reporting year. In addition, the Council have clearly listed their priorities for the coming year. This is commended and indicative of good practice.
3. During 2024, the NO2 annul mean objective was not exceeded at any monitoring location both within and outside of the AQMA boundary. CBC are currently in the process of revoking the AQMA, due to compliance with the Air Quality Objective over the last five years (2020 – 2024), a position supported by Defra. However, as the AQMA was still effective during the monitoring period that this report relates to (2024), reference to the AQMA has still been included throughout. The Cheltenham Borough Council AQMA will no longer be acknowledged in the new updated version of this report in 2026.
4. The Council have provided excellent mapping of all monitoring locations within the Borough and included AQMA boundaries, which is commended.
5. Extensive trend graphs and analysis have been provided for all monitoring data, which is welcomed.
6. QA/QC procedures are appropriate, with evidence provided. The Council could provide details of the national bias adjustment factor by means of comparison, to ensure the most appropriate factor has been applied to the data.
7. There are currently several Smoke Control Areas (SCAs) declared within CBC. However, a cabinet review of the existing SCAs within the borough is scheduled for late 2025. An update on the outcome of this review will be provided in the next update of this report in 2026.
8. It would be preferable to name the director of public health the report has been signed off by.
9. Overall, the report is well structured, detailed and satisfies the criteria of the relevant standards.

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

The [Air Quality Hub](https://urldefense.com/v3/__https:/www.airqualityhub.co.uk/__;!!NslPjgbbnDqexg!MXTUha1QykUYf0og4I4_zSWMMJDkhmcHPxc3x4W8XkXoMKzCv8tAN2zNiACPqkig36lkhRXriv2KN5uX5-XZ1-YTNio7WOXmZGgwzUI$) is now run by Defra, it is a free online information and knowledge sharing resource for local authority air quality professionals. Please consider onboarding on the Air Quality Hub to access a multitude of air quality resources and be kept up to date with local authority air quality activity and air quality news.

Appraisal Response Comment Form

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

**Comments on appraisal/Further information:**