



Mid Devon District Council Air Quality Action Plan

In fulfilment of Part IV of the
Environment Act 1995
Local Air Quality Management

November (2017)

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Date	
Signed Leader of Cabinet	
Signed Chief Executive	

Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the action we will take to improve air quality in Mid Devon 2017-2021.

This action plan replaces the previous action plan which ran from 2009 - 2015.

Projects delivered through the past action plan include:

- Lords Meadows Link road at Crediton was completed in 2014. The link road directs traffic to the industrial estate, and provides an alternative route for traffic going to Tiverton. Early traffic data shows traffic flows using the road are close to modelled predictions and a significant proportion of HGVs and other traffic previously using Exeter Road to access the Lords Meadow Industrial Estate is now using the Link Road. All monitoring locations where there is actual exposure by residents are now currently below the NO₂ air objective. In respect of PM₁₀, the data indicates that concentrations have also continued to fall at all the Exeter Road monitoring location since the Link Road has opened.
- Extended bus service to facilitate access to new Tesco Superstore.
- Reducing emissions through Taxi licensing - from 1 April 2014 all vehicles offered for licensing for the first time must be no more than five years old from the date of first registration (Hackney Carriage & Private Hire Licensing Policy April 2013, Section 2.9).
- Promotion of the Devon-wide concessionary bus fares scheme resulted in a 60% uptake of eligible residents in Mid Devon by 2009. This was subsequently replaced by the National Bus Pass scheme.
- Sustainable school travel and School Travel Plans have been developed by 100% of schools in Mid Devon.
- Traffic Management High Street, Crediton - Bus pull in at St Lawrence Green has been deferred in the programme due to concerns relating to the balance of the benefits to the air quality against the impact on The Green.
- Enhanced evening bus services to Tiverton - Services 1, 1A, 1B. There have been some reductions last year, but services introduced are still in place.

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- ECO Stars scheme - targets vehicle emissions was introduced in Mid Devon in October 2010 and is run by a private company, TTR Ltd, who are specialists in this area. The scheme targets HGV, buses and fleet operators (including taxis) and provides a fuel management and operational efficiency support programme, designed to help operators reduce fuel consumption, thereby improving air quality through reducing particulate emissions and vehicle carbon. The Mid-Devon scheme ran from October 2010 to December 2012, funded from a Defra Air Quality grant. At completion in December 2012 the scheme had 19 members. Despite not being resourced as a stand-alone scheme, Mid-Devon benefited from the programme-wide activity across the UK, which included ongoing recruitment of multi-location based transport operators with a strong presence in the Mid-Devon area, even after completion of the original project recruitment phase. Consequently, at the beginning of the new Devon-wide Scheme in October 2015, membership from the original Mid-Devon scheme was carried over, giving the new Devon scheme a solid starting point of 44 members. As of July 2016 there were 53 companies enrolled in the scheme covering some 2,053 vehicles.
- Crediton Milk Link Dairy boiler changed from heavy fuel to gas.
- Cullompton Distributor Road is designed to provide relief to the town centre. Potential routes include between Tiverton Road and Willand Road (the NW route) which may be required in combination with a link between Station Road and Meadow Lane (the SE or Eastern route) subject to further investigation of air quality and other environmental impacts. This project is still under consideration and is now more central going forward as plans for new developments in excess of 2,000 homes have been approved.
- Town centre traffic management measures Cullompton - Station Rd\Higher Road junction improvement scheme introduced 2013. (New signalised junction with MOVA control). Right turn ban Tiverton Rd \Fore St. Experimental order trialled in 2013, made permanent in 2014. Parking management changes Fore St\High St introduced 2014.
- Introduction of Euro V engine standard on buses along the Culm Valley – Completed and now moving to Euro VI for new double-deckers.

- Investigation of a direct bus route to Exeter via M5 and Sowton/Exeter Business Park possibly in conjunction with funding from Cullompton development – completed and introduced (Service no.1)
- Provision of the Crediton town-bus ‘loop’ service is identified for delivery via existing s106 development funds - Introduced and maintained over a number of years with two stages of developer funding. But not a viable service to maintain commercially and was withdrawn/reduced in 2015.
- Cullompton Railway Station reinstatement feasibility study - £40K investment announced in August 2016. This funding matches a previous commitment by Taunton Deane Borough Council of £40k and, in addition, both Town Councils of Cullompton and Wellington have committed to contributing £10k each, providing the project with a £100k boost with which to push the work forward.

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas^{1,2}

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion³. Mid Devon District Council is committed to reducing the exposure of people in Mid Devon to poor air quality in order to improve health.

We have developed actions that can be considered under 8 broad topics:

- Alternatives to private vehicle use
- Freight and delivery management
- Policy guidance and development control
- Promoting low emission transport
- Promoting travel alternatives
- Transport planning and infrastructure
- Traffic management
- Vehicle fleet efficiency

¹ Environmental equity, air quality, socioeconomic status and respiratory health, 2010

² Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

³ Defra. Abatement cost guidance for valuing changes in air quality, May 2013

Our priorities are:

1. To reduce heavy goods vehicle emissions by expanding the current Eco stars scheme to all the districts within Devon.
2. To work with Devon County Council and the key bus service providers to maximise patronage and link the bus routes more effectively.
3. To improve the Electric Vehicle Charging Network through the installation of units at Council Parks or other appropriate locations and within design specifications for future housing developments (home charging).
4. To work with key partners in re-establishing the Cullompton Rail Station. Mid Devon District Council is investing £40k for the commissioning of engineering design work for a new railway station at Cullompton. This funding matches a previous commitment by Taunton Deane Borough Council of £40k and, in addition, both Town Councils of Cullompton and Wellington have committed to contributing £10k each, providing the project with a £100k boost with which to push the work forward.
5. To support alternative forms of transport such as local car sharing schemes, e-bikes, cycles and local bus services that minimise personal car use.
6. To adopt Local Plan Policies (Low emission strategies) and monitor their implementation in all future development applications.
7. To expand and improve the local network of foot and cycle paths to facilitate a move towards walking or cycling as an alternative to car use for short to medium length journeys.
8. To pro-actively engage all stakeholders with responsibility and or/interest in the development of roads, transport and infrastructure to ensure air quality is central to planning and delivery.
9. To acknowledge that the car will remain the only alternative for some rural locations and to take this into consideration when making policy or undertaking measures that may directly or indirectly affect rural communities.
10. To continue to monitor Mid Devon's two AQMAs and carry out mitigation strategies that will result in their removal from the register.

In this AQAP we outline how we plan to effectively tackle air quality issues within our control. However, we recognise that there are a large number of air quality policy areas that are outside of our influence (such as vehicle emissions standards agreed in Europe), but for which we may have useful evidence, and so we will continue to work with regional and central government on policies and issues beyond Mid Devon District Council's direct influence.

The plan will be delivered through a variety of different mechanisms including the Local Plan Review and planning obligations such as s106 and Community Infrastructure Levy (CIL) in addition to Government infrastructure funds and the Devon County Local Transport Plan (LTP 3). Major infrastructure proposals for example will be included in the Local Plan Review Infrastructure Plan due for submission in March 2017 and will include estimated costs. Overall, greater clarity on funding for specific measures and the plan overall will emerge once the timeline for Local Plan Review examination and adoption is known and from further consultation with Devon County Council in respect of the emerging LTP3.

<https://www.middevon.gov.uk/media/342721/local-plan-review-2013-2033-proposed-submission-january-2017.pdf>

<https://www.middevon.gov.uk/media/342702/mddc-infrastructure-plan-dec-2016-draft-v2.pdf>

Responsibilities and Commitment

This AQAP was prepared by the Public Health and Regulatory Services of Mid Devon District Council with the support and agreement of the following officers and departments:

Development Control, MDDC

Forward Planning, MDDC

Public Health, Devon County Council

Additional contributors:

Leadership Team, MDDC

Community Policy Development group

This AQAP has been approved by: (Pending)

Mid Devon District Council

Community Policy Development Group, MDDC

MDDC Leadership Team

Cabinet and Full Council, MDDC

Director of Devon Public Health

Transport and Planning, Devon County Council

This AQAP will be subject to an annual review, appraisal of progress and reporting to the Community Policy Development Group. Progress each year will be reported in the Annual Status Reports (ASRs) produced by Public Health and Regulatory Services, Mid Devon District Council, as part of our statutory Local Air Quality Management duties.

If you have any comments on this AQAP please send them to Simon Newcombe or Kevin Swift at:

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Introduction

This report outlines the actions that Mid Devon District Council will deliver between 2017-2021 in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to the Mid Devon District area.

It has been developed in recognition of the legal requirement on the local authority to work towards Air Quality Strategy (AQS) objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the Local Air Quality Management (LAQM) statutory process.

Some actions have been developed in partnership with the neighbouring district councils (Greater Exeter): Teignbridge, Mid Devon and East Devon and will be replicated in their Action Plans. A Greater Exeter Strategic Plan is also being prepared. This sits above the individual Local Authority Core Strategies, to guide development across Exeter, Mid Devon, East Devon and Teignbridge. It is expected that a first draft will be published in 2019.

This Plan will be reviewed every five years at the latest and progress on measures set out within this Plan will be reported on annually within Mid Devon District Council's air quality Annual Status Report (ASR).

Summary of Current Air Quality in Mid Devon

Please refer to the latest ASR from Mid Devon District Council.

<https://www.middevon.gov.uk/media/342647/mddc-annual-status-report-2016.pdf>

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion

Mid Devon District Council has examined the results from its air quality monitoring in the district. Concentrations outside of the Air Quality Management Areas (AQMA) in Crediton and Cullompton are all below the objectives at relevant locations.

Concentrations of nitrogen dioxide in Crediton (at the Exeter Road Station) during 2015 remained above the air quality objective (annual mean), however, the levels have dropped and there were no exceedances. Concentrations of particulate matter (PM₁₀) for 2015 in Exeter Road, Crediton have again shown a further improvement and the level of exceedances have also stayed well below the objective confirming the opening of the Lords Meadow Link Road has removed sufficient traffic to reduce levels of particulate matter. We will continue to monitor for a further 12 months in this location and should the levels stabilise or continue to drop, consideration will be given to changing the parameters of the current AQMA.

The non-automatic (diffusion tube) monitoring data indicates that all locations in Mid Devon are below the annual objective but High Street, Crediton and Fore Street, Cullompton do remain close.

The Manor Hotel, Fore Street, Cullompton, had extremely bad data capture as the tube has been regularly missing again so these results should be considered spurious and we have discontinued monitoring at this location. However, starting from January 2015 another tube was located 20m down the road and has returned similar levels which are close to the objective.

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An assessment of all relevant transport, industrial, commercial and domestic sources has not identified any new or significantly changed sources that will result in any potential exceedances of the air quality objectives.

Mid Devon District Council's Air Quality Priorities and Drivers

1.1 Public Health Context

The Mid Devon District Local Public Health Plan is informed by the priorities set out in the Devon Joint Health and Well Being Strategy to address health inequalities and the district specific health surveillance data.

This data is set out in a range of clinical and health indicators measured against England, Regional and Devon averages and produced by Public Health England and Public Health Devon at Devon County Council. A summary of this information is shown on pages 7-10 of the Action Plan (add link to MDDC PH Plan). The full dataset for 2015/16 can be viewed at

<http://www.devonhealthandwellbeing.org.uk/jsna/himp/>.

Air quality in parts of Mid Devon District is a cause for concern, as poor air quality is recognised as being damaging to health and quality of life. The Devon Public Health Outcomes Framework (PHOF) 3.01 indicates that the fraction of mortality associated with PM2.5 is between 3.2 -4.0 (excluding Unitary Authorities). A mortality factor of 3.5 against a total of 8,333 deaths in the Devon County area equates to 292 deaths per annum.

Mid Devon District Council has identified air quality as a local public health priority.

The Council designated the Air Quality Management Area for Crediton in September 2004 and an Air Quality Action Plan in 2006. The findings on air quality showed exceedances of Nitrogen Dioxide (NO₂) in the High Street and exceedances of Nitrogen Dioxide (NO₂) and particulates (PM₁₀) along Exeter Road.

At Cullompton in 2006 the Council authorised making an Air Quality Management Order in respect of Nitrogen Dioxide (NO₂) concentrations and formally designate an Air Quality Management Area (AQMA). Exceedances of an UK Air Quality Objective for nitrogen dioxide are currently being detected in parts of Station Road, Higher Street and Fore Street.

Mid Devon is a predominantly rural district and as such many of its residents are reliant on the car as the only mode of transport. This creates a challenge in terms of offering alternative options and sufficient incentives. The uptake of electric vehicles in

rural areas such as Mid Devon will be slower than major urban centres though the Council will increase charging locations to facilitate their growth.

Agriculture is among the main sources of air pollution and becoming more important as industry and transport are generally subject to tighter controls. In particular, ammonia (NH₃) emissions from agriculture contribute to airborne particulate matter with serious impacts on human health; it also causes eutrophication and acidification of ecosystems. Though not within the scope of this plan Council is committed to working with regulatory bodies and farming communities to mitigate air pollution through good farming practice.

1.2 Planning and Policy Context

The National Planning Policy Framework (2012) notes that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants taking into account the presence of Air Quality Management Areas and cumulative impacts on air quality from individual sites in local areas. The Mid Devon Local Plan currently includes:

- Core Strategy 2006-2026 (adopted 2007)
- Allocations and Infrastructure Development Plan Document (adopted 2010)
- Development Management Policies (adopted 2013)

<https://www.middevon.gov.uk/residents/planning-policy/mid-devon-local-plan/>

This adopted plan includes planning policies which support improvements to local air quality levels including through the provision of infrastructure, managing travel demand, and enhancing walking and cycling opportunities throughout the District.

Within Mid Devon there are two Air Quality Management Areas, Crediton and Cullompton. Planning policies ensure developments within, adjoining or affecting these Air Quality Management Areas provide measures to meet air quality objectives, taking into account the cumulative development impacts.

To improve the air quality in Cullompton Mid Devon District Council (MDDC) and Devon County Council (DCC) are supporting the implementation of a relief road. The relief road links the B3181/Millennium Way roundabout with the Duke Street / Meadow Lane junction and is located between Cullompton town centre to the west and the M5 to the east. It has been assessed as having a very high impact on air quality in the

MDDC Air Quality Management Area Action Plan 2009. Other benefits include reduction in traffic noise along town centre routes and reduced congestion.

The relief road has also been included in the MDDC Core Strategy 2026 (adopted 2007) and the Devon and Torbay Local Transport Plan 3 2011 – 2026. Policy AL/CU/14 of the Allocations and Infrastructure Development Plan Document adopted 2011 requires the provision of a Relief Road linking Station Road to Meadow Lane. The provision of the relief road is identified as a measure that will have a very high benefit to improving air quality within the Cullompton Air Quality Management Area Action Plan 2009, a copy of which is on the Council's website.

<https://www.middevon.gov.uk/media/103608/cullompton-air-quality-action-plan-2009.pdf>

Since the development of the air quality action plan for Crediton a new link road, between Exeter Road southwest of Crediton to Lords Meadow Industrial Estate has diverted significant HDV/LDV traffic movements and some car traffic away from Exeter Rd.

Exeter Road is characterised by a narrow carriageway and a street canyon with properties and other street features very close to the kerbside. The result is frequent congestion, especially when large vehicles meet combined with poor dispersion conditions for pollutants. The fact that the road is on an incline also results in an increase in vehicle emissions due to increased engine workloads and reduced efficiencies.

Due to the narrow carriageway and historic buildings there are no traffic management options along Exeter Road. As a result, the link road offered a direct route into the Lords Meadow Industrial Estate for HGVs and other traffic thereby effectively bypassing Exeter Road within the town and other roads along the access route.

Concentrations of nitrogen dioxide in Crediton (at the Exeter Road Station) during 2015 remained above the air quality objective (annual mean), however, the levels have dropped and there were no exceedances. Concentrations of particulate matter (PM10) for 2015 in Exeter Road, Crediton have again shown a further improvement and the level of exceedances have also stayed well below the objective confirming the opening of the Lords Meadow Link Road has removed sufficient traffic to reduce levels of particulate matter.

Tiverton does not have an AQMA however significant housing development is proposed to the east of the town with the potential to have an impact on air quality within the town. The Allocations and Infrastructure Development Plan Document of 2011 (Policy AL/TIV/5) is committed to ensuring the impact of development through the delivery of the Tiverton EUE does not result in poor air quality. Mitigation measures are required through Policy AL/TIV/5 that are further supported by Policy DM6 of the Local Plan Part 3 (dated 2013). A guiding principle (C7e) of the Adopted Tiverton Eastern Urban Extension Masterplan ensures air quality will not be detrimentally affected and mitigation measures (as appropriate) are incorporated.

As such, planning conditions currently attached to outline planning consents require measures to demonstrate compliance with the carbon footprint targets as set in the adopted Policies AL/IN/6 and AL/TIV/5. The legal agreements associated with these applications require each dwelling to connect to a District Heating Facility subject to a number of factors including the availability of a facility.

<https://www.middevon.gov.uk/media/178384/air-quality-report-final-2014.pdf>

<https://www.middevon.gov.uk/media/103606/crediton-air-quality-action-plan-2006.pdf>

In 2008 Mid Devon District Council adopted an Air Quality and Development Supplementary Planning Document which provides additional guidance on the way in which air quality and air pollution issues will be dealt with through the planning system https://www.middevon.gov.uk/media/85182/air_quality_spd-adopted.pdf

The Mid Devon Local Plan is in the process of being reviewed and is reaching the final stages in its preparation and development. The Local Plan Review continues to support improvements to local air quality levels and prevents significant harm to air quality with particular consideration for Air Quality Management Areas. Once adopted the Local Plan Review will supersede the existing Local Plan and will be an up-to-date plan based on the latest evidence and government guidance. The Council aims to adopt the new Local Plan in January 2018.

<https://www.middevon.gov.uk/residents/planning-policy/local-plan-review/>

1.3 Source Apportionment

The AQAP measures presented in this report are intended to be targeted towards the predominant sources of emissions within Mid Devon's area.

A source apportionment exercise was carried out by Mid Devon District Council in 2016. This identified the percentage source contributions within the AQMAs.

Mid Devon District Council has examined the results from its air quality monitoring in the district. Concentrations outside of the Air Quality Management Areas (AQMAs) in Crediton and Cullompton are all below the objectives at relevant locations.

Concentrations of nitrogen dioxide in Crediton (at the Exeter Road Station) during 2015 remained above the air quality objective (annual mean), however, the levels have dropped and there were no exceedances. Concentrations of particulate matter (PM10) for 2015 in Exeter Road, Crediton have again shown a further improvement and the level of exceedances have also stayed well below the objective confirming the opening of the Lords Meadow Link Road has removed sufficient traffic to reduce levels of particulate matter. We will continue to monitor for a further 12 months in this location and should the levels stabilise or continue to drop, consideration will be given to changing the parameters of the current AQMA.

The non-automatic (diffusion tube) monitoring data indicates that all locations in Mid Devon are below the annual objective but High Street, Crediton and Fore Street, Cullompton do remain close.

The Manor Hotel, Fore Street, Cullompton, had extremely bad data capture as the tube has been regularly missing again so these results should be considered spurious and we have discontinued monitoring at this location. However, starting from January 2015 another tube was located 20m down the road and has returned similar levels which are close to the objective. Full details are available at:

<https://www.middevon.gov.uk/media/342647/mddc-annual-status-report-2016.pdf>

1.4 Required Reduction in Emissions

The table below shows the required reduction in NO₂ concentrations, based on the 2016 measured levels at those monitoring locations where the objective was exceeded.

Table 3.1 Required Reduction in Road NOx Emissions to meet the NO₂ Annual Average Objective.

Location	NO ₂ concentrations (µg/m ³)		Road NOx Emissions
	2016 measured concentration	Required Reduction	Percentage Reduction Required
Fore Street, Cullompton	42 ug.m ³ ±5%	Between 2-4 ug.m ³	Up to 10%
High Street, Crediton	40 ug.m ³ ±5%	Between 0-2 ug.m ³	Up to 5%

1.5 Key Priorities

The focus over the next 5 years will be to ensure we have adequate monitoring of our key growth areas and that Council work with all stakeholders to implement the development management policies (Sustainable Development Principles/Local Plan Part 3).

We will seek to reduce emissions at our 2 AQMAs to within the permitted levels and will then apply to remove the areas from AQMA register.

Development and Implementation of Mid Devon District Council AQAP

1.6 Consultation and Stakeholder Engagement

In developing/updating this AQAP, we have consulted with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 0.1. In addition, we have undertaken the following stakeholder engagement:

- Town Council meetings
- Member briefings
- Devon District Councils (incl. Greater Exeter group) meetings
- Devon County Transport and Planning
- Devon County Public Health

The response to our consultation stakeholder engagement is given in Appendix A.

Table 0.1 – Consultation Undertaken

Yes/No	Consultee
No	the Secretary of State
No	the Environment Agency
Yes	Exeter City Council officials
Yes	Devon County Public Health officials
Yes	Mid Devon Town Councils
Yes	Devon County Council officials (Transport, Planning and Environment Service)
Yes	Mid Devon District Council Forward Planning and Development Teams

1.7 Steering Group

In preparing this report a steering group was not formed due in part to the logistics of pulling together the necessary range of partners. MDDC's Community Policy Development Group provided the oversight for officers and the reporting mechanism.

AQAP Measures

Table 0.1 shows the Mid Devon District Council AQAP measures. It contains:

- a list of the actions that form part of the plan
- the responsible individual and departments/organisations who will deliver this action
- estimated cost of implementing each action (overall cost and cost to the local authority)
- expected benefit in terms of pollutant emission and/or concentration reduction
- the timescale for implementation
- how progress will be monitored

Future ASRs will set out regular annual updates on implementation of these measures

Table 0.1 – Air Quality Action Plan Measures

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
	Title	Select from the categories in blue box	Select from the subcategories in blue box		Date	Date		Impact		Date	
1	Community Car sharing schemes	Alternatives to private vehicle use	Car and lift sharing schemes	MDDC	2017/18	2017-21	Number of car share schemes delivered in new developments Usage rate	Low	s106 contribution allocated and included in new housing travel plans	Pending full release of funds and commencement of development	District wide
2	Community run and/or private E-bikes schemes	Alternatives to private vehicle use	Other	MDDC and Local Town Councils	2017/18	2018-21	E-Bikes accepted and utilised as an alternative mode of transport by residents	Low	Pending securing funding from s106 or other funding source	Pending funding secured	Crediton and Cullompton AQMAs
3	Secure cycle parking facilities in Town Centres and at key transport hubs	Promoting Travel Alternatives	Promotion of cycling	MDDC Rail Network DCC	2018/9	2018-21	Initial facility installed in Crediton	Low	s106 allocated for Crediton railway station and Town centre Included in Cullompton Master planning	Pending release of s106 funds	Crediton and Cullompton AQMAs
4	Marketing campaign to reduce high street parking/promote car parks/raise awareness	Public Information	Leaflets, social media, internet, street posters	MDDC and Town Councils	2017/18	2018-20	Increase in level of awareness of local air quality issues/change in behaviour	Low	Planning stage	2018/19	Constitation with DCC and Town Councils required
5	Develop EV charging network	Promoting Low Emission Transport	Alternative refuelling infrastructure	MDDC	2017/18	2017-21	7 units to be installed across the district in the first phase	Medium	Contract with supplier signed	End of 2018	Further charging points to be installed as funding is allocated (see 18) District wide

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Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
6	Taxi Licensing conditions	Promoting Low Emission Transport	Low emission policy	MDDC	2017	2017-21	Policy review undertaken to develop ULEV taxi fleet and infrastructure	Low	Current policy updated 2017	Ongoing	District wide
7	Eastern Relief Road Cullompton and additional M5 junction	Traffic Management	Strategic highway improvements	MDDC DCC Highways	2017/18	To be determined	% reduction in traffic flows through Cullompton Reduction in congestion on minor roads	High	Local Plan submission Land allocated and preliminary design work undertaken	Pending funding and adoption of Local Plan	Major infrastructure funding required Cullompton AQMA
8	Coordinated approach to enforcement of anti-idling, illegal parking	Traffic management	Anti-idling enforcement and illegal parking	MDDC DCC	2017/18	2017/20	Improved traffic flow at key pinch points Delivery of awareness raising campaign with drivers	Low	Initial consultation held with Town Councils	2018	Crediton and Cullompton AQMAs
9	Kings Mill Industrial site traffic management Cullompton Junction 28	Traffic management	Congestion management	MDDC DCC Highways	2017/18	To be determined	Improved traffic flows to/from industrial site	Low	Local Plan submission	Ongoing	Site is due for major expansion Cullompton AQMA
10	Parking and traffic flow measures	Traffic management	Congestion management	MDDC DCC	2017/8	2018	Improved traffic flows Decrease in main street parking Increase use of MDDC car parks	Medium	Measures identified by Town Councils and MDDC	Ongoing	Includes resident car parking rates, traffic light changes, enforcement Crediton and Cullompton AQMAs
11	Cullompton/Wellington Rail link feasibility study	Transport Planning and Infrastructure	Public transport improvements-interchanges stations and services	MDDC and Taunton Deane	2017	2017/18	Feasibility study completed	Medium	Joint project £100K committed to study Local Plan submission	2018	Cullompton AQMA

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Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
12	ECO Stars fleet management and recognition scheme	Transport Planning and Infrastructure	Vehicle efficiency	MDDC	Completed	Current	% Increase in number of companies in the scheme	Low	Continuing program	Ongoing	National scheme aimed at improving vehicle efficiency
13	Bus stop infrastructure	Transport Planning and Infrastructure	Public transport improvements-interchanges stations and services	MDDC DCC	2017/18	2017-21	Change to mode of transport Increase in patronage	Medium	£106 contribution allocated	Pending full release of funds	Copplestone Village Crediton AQMA
14	Review of bus stop locations and routes	Transport Planning and Infrastructure	Public transport improvements-interchanges stations and services	MDDC DCC	2017-18	2017-21	Improved Traffic flow through centre of towns	Medium	Town Council consultation	2021	Pending agreement with DCC and Bus operators District wide
15	Improving footpath and cycling paths In major towns	Transport Planning and Infrastructure	Cycle and walking network	Town Councils MDDC DCC	2017/18	2017 -21	Connected pathway network Improved accessibility Reduction in short car journeys	Low	Initial network improvements identified in Neighbourhood plans and s106 projects	Ongoing	Implementation plan required to identify sources of funding and priorities District wide
16	Road surfacing	Transport Planning and Infrastructure	Consideration given to lower polluting road surfacing within AQMA areas as opportunities arise	DCC	2018/19	2018-21	Areas of existing or new road network resurfaced	Low	Review phase	Ongoing	
17	Mid Devon Local Plan	Policy guidance and development control	Air Quality Planning and Policy Guidance	MDDC	Development Management Policies	Until Dec 2017	Local Plan adopted	High	Review phase completed	January 2018	Includes planning policies which support improvements to local air quality levels including technical guidance on emissions assessment work and low emission strategies (Policy DM6)

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Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
18	Culm Valley Garden Village development and major infrastructure projects	Policy guidance and development control	Air Quality Planning and Policy Guidance	MDDC DCC Highways	2017-21	2017-30	Public Health considerations incorporated in Master planning cycle	High	Culm Village funding awarded by Central Government Steering group formed Site and land secured	Ongoing	
19	Planning Policy DM8 Parking	Policy Guidance and Development Control	Other Policy	MDDC	2017	2017-21	Standards adopted for electric vehicle infrastructure	Medium	Revised in Local Plan review 2017	Ongoing	
20	Planning Policy DM6 Transport and Air Quality	Policy Guidance and Development Control	Other Policy	MDDC	2017	2017-21	Low Emission and Transport Assessments completed Travel Plans completed	Medium	Revised in Local Plan review 2017	Ongoing	
21	Planning Conditions on Tiverton Eastern Urban Extension	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	MDDC	2017/18	2017-30	Air Quality Emissions Noise	N/A	Review phase	Ongoing	

Table 0.2 – Air Quality Action Plan Measures Detail

Measure No.	Measure	Detail
1	Community Car sharing schemes	Local Plan Part 3; Development management Policies – Policy DM6 identifies car club and car sharing schemes as a mitigation measure. Locations and s106 funds identified: Crediton (£30K), Cullompton (£30K)
2	E-bikes scheme	Initially looking at major centres to link new developments with town centres and transport hubs. Concept and design based upon Co-Bikes scheme in Exeter, though could also include community run schemes. Awaiting s106 allocation or alternative funding source such as ERDF.
3	Secure cycle parking facilities in Town Centres and at key transport hubs	Locations and s106 identified: Crediton (£8K), Cullompton (£30K). Location in Tiverton under consideration to join town centre with Tiverton parkway railway station.
4	School and community travel routes	Will follow similar study carried out in Newton Abbot (Teignbridge Council). Looking to implement initially in Cullompton. S106 funds have been identified but not yet allocated.
5	Develop EV charging network	Policy DM8 of the Local Plan Part 3 identifies a minimum standard for the provision of EV infrastructure as recommended by the Low Emissions Strategic Partnership for 3-phase or accelerated electricity supply. Individual properties within new housing developments will have their own charging points. Currently there are s106 allocations for improving the EV charging network in Crediton (£100K) and Cullompton (£150K). A contract to install 7 charging points has been signed between MDDC and a private operator with installation due in 2017.
6	Taxi Licensing conditions	Policy to be updated again in 2018.
7	Eastern Relief Road Cullompton and additional M5 junction	Major infrastructure will be required to mitigate current high levels in the town centre and accommodate the increased traffic volumes arising from Cullompton's proposed growth. Consideration could be given to pedestrianizing the High Street.
8	Coordinated approach to enforcement of anti-idling	Concern identified by Town Council.
9	Kings Mill Industrial site traffic management Cullompton Junction 28	As the site will increase in size thus increasing volumes trying to leave/enter the M5 a range of initiatives are proposed to deal with the problem including no7 (ERR)
10	Explore alternative parking and traffic flow measures	Consultation with Town councils has identified a number of smaller measures that could alleviate congestion at Both Crediton and Cullompton. Further consultation with DCC/Highways will be required to look at feasibility.

Measure No.	Measure	Detail
11	Cullompton/ Wellington Rail link feasibility study	Land has been identified that will accommodate this infrastructure. A 'bus' hub built next to the Rail Station that links with new developments is proposed.
12	ECO Stars fleet management and recognition scheme	This program has good membership in Mid Devon but does require further expansion into Devon.
13	Bus stop infrastructure	S106 allocations in place for Copplestone bus infrastructure improvements that affects Crediton AQMA.(£177K)
14	Review of bus stop locations and routes	Review of Cullompton and Crediton services – includes frequency, location of bus stops, routes.
15	Improving footpath and cycling paths In major towns	Improved footpath and cycleway links between Cullompton town centre and Kingsmill Industrial Estate; Cromwells Meadow to Leisure centre in Crediton;
16	Road surfacing	Design consideration for relevant road links within both Cullompton and Crediton AQMAs. Could be managed on a contract by contract basis.
17	Mid Devon Local Plan	Waiting final approval by Inspector.
18	Culm Valley Garden Village development and major infrastructure projects	Includes planning policies which support improvements to local air quality levels including technical guidance on emissions assessment work and low emission strategies (Policy DM6).
19	Planning Policy DM8 Parking	Includes EV charging network, provision for cyclists and minimum parking limits.
20	Planning Policy DM6 Transport and Air Quality	Development proposals should be accompanied by an Integrated Transport Assessment, Travel Plan and Traffic Pollution Assessment, and Low Emission Assessment and any impact on the AQMA.
21	Planning conditions on Tiverton Eastern Urban extension	Major extension to the east of Tiverton requiring detailed Low Emission strategies from developers.

Appendix A: Response to Consultation

Table A.1 – Summary of Responses to Consultation and Stakeholder Engagement on the AQAP

Consultee	Category	Response
Public Health Devon County Council	Health	<p>The Public Health Outcomes Framework (May 2017 update) estimates that the proportion of mortality in the Devon County Council area associated with air pollution in 2015 was 3.8%. This would equate to a 335 deaths associated with air pollution out of 8,817 total deaths in 2015. (update on Page 5).</p> <p>Agree on plans to extend the network of EV points. MDDC may be interested to know that Torbay Council have included the need for EV charging points at all new domestic buildings.</p> <p>Support the use of monitoring equipment to influence behaviour change. We would also encourage consideration of other behaviour change and social media campaigns.</p> <p>With regards to the potential railway station at Cullompton we would expect to see appropriate infrastructure for cycle routes to connect residents to the station as the main mode of transport. Additional consideration should also be given to the impact on noise and tranquillity.</p> <p>We support the plan to create a cycle route between Shobrooke and Lords Meadow Leisure Centre, we would also encourage extending the link into a loop that would facilitate walking, running and cycling for recreation.</p>
Crediton Town Council representatives	Local Council	<p>Feasibility study – High Street bus, zones for idling vehicles, possible alternatives for the bus turning around</p> <p>Review Bus stop opposite Crown hotel outside old post office</p> <p>Crediton Neighbourhood Plan feedback – Improvements to foot/cycling paths, Crediton Rail Station Park and Ride, buses not convenient, too far to walk to</p>

		<p>a bus-stop, convenient footpaths making walking a more positive experience</p> <p>Road sweeping – noted it reduces pollutants from tyres</p> <p>Review School bus run – when the High Street was closed it worked better</p>
Cullompton Town Council	Local Council	<p>The Eastern Relief Road links the B3181 / Millennium Way roundabout with the Duke Street / Meadow Lane junction and is located between Cullompton town centre to the west and the M5 to the east. The building of this road before or at the same time as housing development begins was seen as essential in avoiding a further deterioration in air quality.</p> <p>The additional Junction further south on the M5 was roundly supported and would also greatly reduce the impact on the town centre.</p> <p>Issues still exist at Junction 28 particularly for HGVs accessing the motorway from Kings Mill Industrial estate. Given the expected expansion of Kings Mill further traffic lights that manage access to the motorway from the industrial site should be considered. The number of cars being parked at Gregorys by their staff indicated a lack of non-car alternatives for accessing the industrial site.</p> <p>The proposed new Cullompton train station had much support. It could also facilitate a bus station next to it to link the network more effectively. A ‘Loop’ bus service would be a desirable asset that linked the new rail station with the rest of the town, including the new developments on both sides of the motorway.</p> <p>Consideration should be given to providing amenities (corner shop, take-away/restaurant, hairdressers) on the new development areas to reduce the number of short car journeys into town for basic supplies. Where possible,</p>

		<p>housing for the elderly should be located close to these amenities.</p> <p>New developments should be designed with accessible shortcuts that make it easier for residents to walk or cycle more directly into town.</p> <p>An electric bike network across the new developments and within the town could reduce short car journeys into town significantly and have some health benefits for residents.</p> <p>Access for students between the new primary school in East Cullompton and the senior school in (West) Cullompton should be made a priority consideration when the new relief road is built. Existing pathways could be improved to join the two schools. Minimising children’s exposure to pollution caused by the motorway needs some innovative solution.</p> <p>Fore Street – several ideas were raised to mitigate the air quality problem/traffic congestion in the centre of town as follows:</p> <ol style="list-style-type: none"> 1) Enforcement of delivery times, current restrictions mainly ignored. 2) Residents of Fore Street (and surrounds) to be given reduced overnight rate at Forge Way car park to discourage using Fore Street. Currently only about 8 residents using this facility. 3) Staggered traffic light system through Fore Street allowing only one direction at a time. 4) Tiverton Rd/Fore Street junction is problematic and creates traffic congestion and unsafe manoeuvres. Consider 3-way traffic light system, with the Tiverton road light placed much further back to make it safer for vehicles turning into/out of Tiverton road sufficient
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		<p>room to make the manoeuver. A Pelican crossing may be required in Fore Street.</p>
<p>Devon County Council Transport and Planning</p>	<p>County Authority</p>	<p>It remains to be the case that Devon County Council does not have any in principle objection to the AQAP, but has some advisory comments regarding the measures outlined in table 5.1. These are outlined below.</p> <ul style="list-style-type: none"> • It is noted that e-bikes are mentioned but it is doubted whether there are plans to install these in Crediton as it is doubted as to whether there is either the demand or the destinations that would make them a success. Usage of e-bikes in Exeter is low, so Devon County Council would urge caution with this measure. • The responsibility for school travel plans should sit with the schools themselves • Reading Council has done some work around anti-idling which gives some sensible proposals around what may be possible. http://www.reading.gov.uk/media/6353/Item09-Idling-Nov16-Report-to-SEPT/pdf/Item09_Idling_Nov16_Report_to_SEPT.pdf. The legal position is unclear, but this may include issuing fixed penalty notices. • A review of parking/traffic management on High Street in Crediton has been looked at several times in the past with no obvious solution as locals like to keep going up and down until they find a space right outside the shops rather than use the car park. They always say that locals don't like walking up the hill to the car park. <p>If MDDC were minded to add more ideas, perhaps a more innovative approach would be to have a marketing campaign approach in terms of</p>

		<p>AQMA towns – e.g. signage (i.e. displayed on P&D Machines), telling people they are contributing towards poor air quality in Crediton by parking on High Street. Having people travel two or three times up and down the high street at a slow pace looking for a car parking space must be having a huge impact. On the other hand, this could be more of a positive marketing approach – i.e. encouraging people to park and stride (from St Saviour’s Car Park) – selling the health benefits to your town and yourself by reducing traffic flows on High Street whilst increasing heart rate to improve health and wellbeing.</p>
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Appendix B: Reasons for Not Pursuing Action Plan Measures

Table B.1 – Action Plan Measures Not Pursued and the Reasons for that Decision

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
	St Lawrence Green Bus lay-by Crediton	Would require removal of a section of the historic green which would not be supported by local residents
	Improving School Travel Plans	Not specifically within the remit of MDDC – to be worked out by schools and Devon County Council

Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
AQS	Air Quality Strategy
ASR	Air quality Annual Status Report
Defra	Department for Environment, Food and Rural Affairs
EU	European Union
LAQM	Local Air Quality Management
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
PM ₁₀	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
PM _{2.5}	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less

References

¹ Environmental equity, air quality, socioeconomic status and respiratory health, 2010

² Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

³ Defra. Abatement cost guidance for valuing changes in air quality, May 2013