

Local Authority:	<b>Exeter City Council</b>
Reference:	<b>ASR25-2753</b>
Date of issue	<b>August 2025</b>

## Annual Status Report Appraisal Report

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

ECC currently has one Air Quality Management Area (AQMA). 'Exeter AQMA 1' was first declared in March 2007 for exceedances of the NO<sub>2</sub> annual mean and NO<sub>2</sub> 1-hour mean Air Quality Objective (AQO). The AQMA was amended in May 2011. ECC have put forward the amendment of the boundary of the AQMA so that the area of the AQMA is reduced to just an area of exceedance on East Wonford Hill (around DT57). ECC states it is anticipated that this will be adopted by the end of March 2026. The current Air Quality Action Plan (AQAP) is due to expire at the end of 2024, but ECC do plan on publishing a new AQAP which focuses on the amended AQMA.

ECC undertook automatic monitoring at two sites, CM1 and CM2, which are both located in AQMA 1. Monitor CM1 measures NO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub> and O<sub>3</sub>, whereas CM2 only measures PM<sub>10</sub> and PM<sub>2.5</sub>. The highest NO<sub>2</sub> annual mean concentration recorded was 17.1 µg/m<sup>3</sup> at CM1, which did not exceed the annual mean or 1-hour NO<sub>2</sub> AQO. Only CM2 recorded an PM<sub>10</sub> annual mean concentration of 14.1 µg/m<sup>3</sup> which is below the annual mean AQO. There were no exceedances of the 24-hour mean at either site during 2024. CM2 recorded an PM<sub>2.5</sub> annual mean concentration of 8.5 µg/m<sup>3</sup>, which did not exceed the annual mean AQO. There were no exceedances of O<sub>3</sub> in 2024.

ECC undertook non-automatic NO<sub>2</sub> diffusion tube monitoring at 84 sites in 2024. Changes to the monitoring network were made by ECC in 2024; two sites (DT48 and DT74) from 2023 were removed and two sites (DT86 and DT87) were added at the junctions of Magdalen Street, Holloway Street, South Street and Western Way. This was due to significant works to the road layout. The highest NO<sub>2</sub> annual mean concentration recorded was 38.1 µg/m<sup>3</sup> at DT57, within AQMA 1, which is within 10% of the AQO. The general trend in NO<sub>2</sub> annual mean concentrations is mixed with 14 monitoring sites recording an increase in concentrations between 2023 and 2024, and the rest recording a decrease in concentrations over the same time scale.

Robust QA/QC procedures have been applied to the 2024 data. ECC used the laboratory Gradko, and the preparation method, 20% TEA in water. All diffusion tube recorded data capture of 75% therefore annualisation was not required. ECC applied a national bias adjustment factor

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of 0.84 to the 2024 monitoring data, but there is a lack of justification and calculations included. Annualisation was required at monitoring site CM1 as a data capture rate of below 75% was recorded for NO<sub>2</sub> and O<sub>3</sub>. Appropriate calculations have been included. No automatic NO<sub>2</sub> monitoring locations required distance correction during 2024.

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.

ECC have not highlighted three key measures in yellow in Table 2.2. To help improve the visibility of local authority action to reduce air pollution, three key measures should be highlighted in Table 2.2 will be fed through to UK-AIR. These should be measures the local authority would like to raise awareness of amongst local communities. Please ensure each measure title is succinct and meaningful to the public and includes completion dates. Guidance on how to pitch this information is available [here](#). You should avoid using acronyms in the description of the action or when listing the organisations involved.

On the basis of the evidence provided by the local authority the conclusions reached in the report are **accepted** for all sources and pollutants. Following the completion of this report, Exeter City Council should 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. Last year's ASR appraisal comments have been included and addressed. This is commended.
2. ECC have stated that the Diffusion Tube Monitoring Calendar provided was adhered to, which is commended.
3. ECC have not stated whether the diffusion tube data needed distance correcting. This needs to be amended before final submission.
4. An appropriate appendix has been provided about the amendment of the AQMA. This is welcomed and commended.
5. Good quality trend graphs have been included with comparison with the AQO. This is commended.
6. Clear maps of monitoring locations and AQMA boundaries have been included. This is commended.
7. There are few pollutant names that haven't been subscripted e.g NO2 should be NO<sub>2</sub>. This should be amended.

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