Wiltshire Council

AGENDA

Meeting: **Cabinet**

Place: **Kennet Room - County Hall, Bythesea Road, Trowbridge, BA14 8JN**

Date: **Tuesday 19 March 2024**

Time: **10.00 am**

Please direct any enquiries on this Agenda to Stuart Figini of Democratic Services, County Hall, Trowbridge, email committee@wiltshire.gov.uk

Press enquiries to Communications on direct lines 01225 713114/713115.

All public reports referred to on this agenda are available on the Council's website at www.wiltshire.gov.uk

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Membership:

Cllr Richard Clewer	Leader of the Council and Cabinet Member for Economic Development, Military-Civilian Integration, Heritage, Arts, Tourism, Health and Wellbeing
Cllr Laura Mayes	Deputy Leader and Cabinet Member for Children's Services, Education, and Skills
Cllr Phil Alford	Cabinet Member for Housing, Strategic Assets and Asset Transfer
Cllr Ian Blair-Pilling	Cabinet Member for Public Health, Leisure, Libraries, Facilities Management, and Operational Assets
Cllr Nick Botterill	Cabinet Member for Finance, Development Management and Strategic Planning
Cllr Jane Davies	Cabinet Member for Adult Social Care, SEND and Inclusion
Cllr Nick Holder	Cabinet Member for Environment and Climate Change
Cllr Ashley O'Neill	Cabinet Member for Governance, IT, Broadband, Digital, Licensing, Staffing, Communities, and Area Boards
Cllr Caroline Thomas	Cabinet Member for Transport, Street Scene, and Flooding

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Public Participation

Please see the agenda list on following pages for details of deadlines for submission of questions and statements for this meeting.

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Part I

Items to be considered while the meeting is open to the public

Key Decisions Matters defined as 'Key' Decisions and included in the Council's Forward Work Plan are shown as

1 **Apologies**

To receive any apologies for absence.

2 **Minutes of the Previous Meeting** *(Pages 5 - 24)*

To confirm as a true and correct record and sign the minutes of the Cabinet meeting held on 6 February 2024.

3 **Declarations of Interest**

To receive any declarations of disclosable interests or dispensations granted by the Standards Committee or Monitoring Officer.

4 **Leader's Announcements** *(Pages 25 - 28)*

To receive the attached announcement from the Leader of the Council.

5 **Public Participation and Questions from Councillors**

The Council welcomes contributions from members of the public.

This meeting is open to the public, who may ask a question or make a statement. Questions may also be asked by Members of the Council.

Written notice of questions or statements should be submitted to Democratic Services at committee@wiltshire.gov.uk by 12.00 noon on 13 March 2024.

6 **Arts Council Music Hub Investment Programme** *(Pages 29 - 38)*

To receive a report from the Corporate Director, People.

7 **Air Quality Action Plan** *(Pages 39 - 206)*

To consider a report from the Chief Executive and the Corporate Director, Place.

8 **Update on Community Conversations** *(Pages 207 - 214)*

To receive a report from the Chief Executive.

9 **The renewal of mail printing and production contract for Revenues and Benefits 2024** *(Pages 215 - 222)*

To receive a report from the Corporate Director, Resources, and Deputy Chief Executive.

10 **Urgent Items**

Any other items which the Leader agrees to consider as a matter of urgency.

11 **Exclusion of the Press and Public**

This is to give further notice in accordance with paragraph 5 (4) and 5 (5) of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 of the intention to take the following item in private.

To consider passing the following resolution:

To agree that in accordance with Section 100A(4) of the Local Government Act 1972 to exclude the public from the meeting for the business specified in Item Numbers 12-13 because it is likely that if members of the public were present there would be disclosure to them of exempt information as defined in paragraph 3 of Part I of Schedule 12A to the Act and the public interest in withholding the information outweighs the public interest in disclosing the information to the public.

Reason for taking item in private:

Paragraph 3 - information relating to the financial or business affairs of any particular person (including the authority holding that information).

Part II

Items during consideration of which it is recommended that the public should be excluded because of the likelihood that exempt information would be disclosed

12 **Update on Safety Valve Agreement with the Department for Education** *(Pages 223 - 304)*

To receive an update from the Corporate Director, People

13 **Transfer of Local Enterprise Partnership Functions** *(Pages 305 - 320)*

To consider a report from the Corporate Director, Place.

Cabinet

MINUTES OF THE CABINET MEETING HELD ON 6 FEBRUARY 2024 AT KENNET ROOM - COUNTY HALL, BYTHESEA ROAD, TROWBRIDGE, BA14 8JN.

Present:
Cllr Richard Clewer (Chairman), Cllr Laura Mayes (Vice-Chairman), Cllr Phil Alford, Cllr Ian Blair-Pilling, Cllr Nick Botterill, Cllr Jane Davies and Cllr Nick Holder

Also Present:
Cllr Richard Budden, Cllr Tony Jackson, Cllr Gordon King, Cllr Jerry Kunkler, Cllr Dr Brian Mathew, Cllr Tamara Reay, Cllr Pip Ridout, Cllr Martin Smith and Cllr Graham Wright

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9 **Apologies**

Apologies were received from Cllrs Ashley O'Neill and Caroline Thomas.

Cllr Thomas joined the meeting virtually.

10 **Minutes of the Previous Meeting**

The minutes of the meeting held on 16 January 2024 were presented for consideration, and it was,

Resolved:

To approve and sign the minutes as a true and correct record.

11 **Declarations of Interest**

There were no declarations of interest.

12 **Leader's Announcements**

The Leader noted announcement by government on 5 February 2024 of details of revisions to the Local Government Financial Settlement. This would be explained further during consideration of the budget proposals.

13 **Public Participation and Questions from Councillors**

Questions were received from Members of the Public and Members of the Council as detailed in Agenda Supplement 2.

Lucie Castlemain was in attendance on behalf of Hilperton Area Action Group regarding Question 24-12 which the group had submitted regarding recent changes to the National Planning Policy Framework (NPPF), and on Housing Land Supply in Wiltshire.

A supplementary question was asked seeking more detail on the setting of the housing figures for the Local Plan process.

It was explained that the recent changes to the NPPF reduced the housing land supply that the council was required to demonstrate from 5 years to 4 years, as a result of being sufficiently advanced in its Local Plan review process. In the absence of that progress on the review the council would still be required to demonstrate a 5 year housing land supply, and the tilted balance in favour of development beyond allocated housing sites would still apply. However, although the council had progressed its Local Plan the calculation of projected housing need for Wiltshire across the Local Plan period which was required to be delivered remained the same irrespective of changes to the NPPF on demonstrating housing land supply.

14 **Financial Year 2023/24 - Q3 Revenue Budget Monitoring**

Cllr Nick Botterill, Cabinet Member for Finance, Development Management, and Strategic Planning, presented a report which provided details of the revenue budget monitoring forecast for the third quarter of the financial year 2023/24, based on the position at the end of December 2023.

It was explained that the forecast revenue underspend for at the end of the third quarter had risen to £0.634m as a result of setting realistic income targets and control of expenditure. Overspend in People services had increased, mostly due to the continuing rise in the cost of care packages and SEND transport.

Cllr Botterill drew attention to the significant pressure on council finances arising from the dedicated schools grant (DSG) and increases in activity across high needs block budgets, driven by demand for statutory support for vulnerable children. Through work in the High Needs Sustainability Programme through aligned with the requirements of the Safety Valve programme, the council was further developing its DSG Management
Plan in order to reach a sustainable position, but this would require major work to cover forecast expenditure of over £97m.

The Leader stated that the Cabinet would continue to lobby government regarding the pressures arising from the high needs block.

Cllr Pip Ridout, Chairman of the Financial Planning Task Group, stated the report showed a food financial position, and that the Task Group continued to examine proposed savings and risks including staff pay, inflation and cost of living.

Cllr Gordon King welcomed the report making the council's financial position and potential risks clear.

Cllr Martin Smith sought additional details relating to reported underspend in highways and transport. It was stated there was seasonal work, and others had invoices which would come in later, which would see the spending position regularise by the end of the financial year.

At the conclusion of discussion, it was then,

Resolved:

That Cabinet approves:

a) **The transfer of £0.068m from the Feasibility earmarked reserve to fund a feasibility study for the Super Bus Network;**

b) **The transfer of £0.250m budget from the overachievement of income in Leisure operations to Libraries to address the £0.182m staffing overspend and increase the book fund by £0.068m;**

c) **The transfer of £0.130m in 2023/24 from the Libraries and Leisure Programmes reserve to contribute to the Holiday Activity Food Programme;**

d) **The gain in income Business Rates in 2023/24 of £8.666m be transferred into a new High Needs reserve;**

e) **The transfer from the Collection Fund Volatility reserve, as follows:**

   i. **£6m to the General Fund reserve;**
   ii. **£6m to the Insurance reserve;**
   iii. **£2.572m to the High Needs Reserves.**

f) **The transfer of £2.007m balance of the Latent Demand reserve to the Transformation reserve;**

g) **The movement in DSG reserve as tabled in table 12 bringing the total DSG reserve to a £56.247m deficit position.**

That Cabinet Notes:

h) **The current revenue budget is forecast to underspend by £0.634m by the end of the financial year;**

i) **The current forecast savings delivery performance for the year.**

Reason
To inform effective decision making and ensure sound financial management as part of the Councils overall control environment.

To inform Cabinet on the forecast revenue financial position of the Council as at quarter three (31 December 2023), including delivery of approved savings for the year.

15 **Financial Year 2023/24 - Q3 Capital Budget Monitoring**

Cllr Nick Botterill, Cabinet Member for Finance, Development Management, and Strategic Planning, presented a report which provided details of the revenue budget monitoring forecast for the third quarter of the financial year 2023/24, based on the position at the end of December 2023.

The capital programme forecast had been recalculated to around £169m. This was expected to reduce further by the end of the financial year, although the actual spend remained above the level from the previous year.

The Leader stated capital forecasting was improving, but some movement in forecasting would still occur.

Cllr Pip Ridout, Chairman of the Financial Planning Task Group, added that she agreed forecasting had improved in recent years, though with some projects brought forward and others pushed back.

Cllr Gordon King welcomed the improvement in forecasting from the reports.

At the conclusion of discussion, it was then,

Resolved:

That Cabinet approves:

a) **The removal of the £0.198m Corporate Capital scheme balance and its associated funding;**

b) **The removal of the £0.322m Dunns Lane Car Park, Castle Combe extension scheme and its associated funding;**

c) **The removal of £0.038 of the Council House Build Programme Phase 1 and its associated funding;**

d) **The use of £0.068m of earmarked reserves to enable Passenger Transport to undertake a feasibility study for the Super Bus Network;**

e) **The grant income applied for and/or received as set out in Appendix C and Appendix D.**

That Cabinet Notes:

f) **The additional budgets added to the programme of £0.458m under Chief Finance Officer delegated powers;**

g) **The movement of £37.475m of budgets into future years under Chief Finance Officer delegated powers;**

h) The budgets brought forward from future years into the 2023/24 programme totalling £11.556m under Chief Finance Officer delegated powers;

i) Budget movements between schemes;

j) The revised 2023/24 Capital Programme forecast as at quarter three of £168.943m; and,

k) The capital spend as at 31 December of £92.778m

Reason
To inform effective decision making and ensure sound financial management as part of the Councils overall control environment.

To inform Cabinet on the financial position of the Council on the 2023/24 capital programme as at quarter three (31 December 2023).

16 **Corporate Performance and Risk Report 2023/24 Q3**

Cllr Richard Clewer, Leader of the Council, introduced a report on measures of performance using data available at the end of the second quarter of the year up through December 2023, in order to assess progress against the goals of the council's Business Plan.

Metrics relating to children and schools which were not moving in the right direction were highlighted, though it was noted the council had limited direct control to influence the metrics in some areas.

Cllr Laura Mayes, Deputy Leader of the Council and Cabinet Member for Children, Education, and Skills, provided details of programmes in place to address some of the metrics, but that these would take time before they had an impact and could be assessed.

Cllr Nick Holder, Cabinet Member for Environment and Climate Change, drew attention to metrics relating to the council's carbon emissions. He confirmed the latest position of 3568 tonnes per year, which had been listed incorrectly in the first two quarter reports, but correctly reported to Full Council in October 2023.

Cllr Jane Davies, Cabinet Member for Adult Social Care, SEND, and Inclusion, provided additional details on the recording of adults in care, including if returning to care following a hospital visit being counted separately to their initially being taken into care.

Cllr Phil Alford, Cabinet Member for Housing, Strategic Assets, and Asset Transfer, added further information regarding affordable housing, decreases in demand for temporary accommodation, and the importance of data cleansing on the housing register to remain up to date and accurate.

Cllr Graham Wright, Chairman of the Overview and Scrutiny Management Committee, confirmed the Committee would review the report in detail at its next meeting, and noted details relating to staff vacancies, and sought information on the impact on any performance as a result.

Cllr Gordon King stated he shared concerns regarding educational attainment and performance, and looked forward to further scrutiny of the information.

At the conclusion of discussion, it was then,

Resolved:

That Cabinet note and agree:

a) Performance against the selected measures mapped to the Council's strategic priorities;

b) The Strategic Risk Summary

Reason
To provide Cabinet with a quarterly update on measures used to monitor progress against the 10 missions laid out in Wiltshire Council's Business Plan 2022-32.

The Strategic Risk Summary captures and monitors significant risks facing the Council, in relation to in-service risks facing individual areas and in managing its business across the authority.

This is supported by, and in compliance with, the Council's Corporate Performance and Risk Policy.

17 **Wiltshire Council Budget 2024/2025 and MTFS Update 2024/25-2026/27**

Cllr Nick Botterill, Cabinet Member for Finance, Development Management, and Strategic Planning, presented a report which provided details of the proposed 2024/25 budget and the medium-term financial strategy 2024/25 to 2026/27.

Details were provided around the impact of continued high inflation, the addition of £36m to service budgets with a net rise of £17m to the budget. Cllr Botterill noted the difficult financial situation of many councils, and that the proposed budget was balanced without seeking closure of household recycling centres, libraries or leisure centres, and did not rely on major new identified or unspecified savings or use of reserves. However, the ongoing pressure of increases in demand and cost pressures did require the council tax rise proposed, with over 80% of the council's net expenditure funded from sources the council controlled.

On 5 February 2024 the government had provided details of an updated local government financial settlement. The council would receive an additional £4.526m, of which £3.798 was part of a social care grant and would be utilised

on furthering the council's preventative approach to improve services and reduce costs. It was emphasised the additional funding could not be guaranteed for future years.

The remaining additional funding it was proposed to allocate to rural air quality monitoring projects, on refurbishment of rural play areas, and on a project to secure additional volunteers.

The Leader welcomed the additional funding announced by government, following an effective campaign from the County Council's Network. He explained the limitations on the allocation, in particular on the one-off nature, and the need to focus it in areas which did not have ongoing revenue costs. He explained many play areas were not fit for purpose, and the council would work with parish councils to discuss taking on maintenance where new equipment was able to be provided.

Cllr Ian Blair-Pilling, Cabinet Member for Public Health, Leisure, Libraries, FM, and Operational Assets, noted the continued investment in services planned within the budget despite the difficult financial, supporting communities and the economy.

Cllr Jane Davies, Cabinet Member for Adult Social Care, SEND, and Inclusion, provided details of the varied support and signposting work undertaken through council libraries.

Cllr Nick Holder, Cabinet Member for Environment and Climate Change drew attention to investment in a programme for provision of new real time monitoring equipment to improve data collection regarding emissions in Westbury. He stated with the newly announced funding the council intended to work with universities to develop understanding of particulate emissions across the county, and provide a meaningful baseline of data.

Cllr Graham Wright, Chairman of the Overview and Scrutiny Management Committee, explained that the Committee had held a lengthy meeting on 25 January 2024 to review the proposed budget. A report of that meeting and topics raised or discussed was included at Appendix 2.

Cllr Gordon King welcomed details of emissions monitoring for Westbury, and would save further comments for debate on 20 February 2024.

Two questions from Cllr Richard Budden as detailed in Agenda Supplement 2 were received. Cllr Budden asked a supplementary question, detailing his concerns regarding maintenance of non-principal roads, requesting area by area spending within the last 4-5 years, and that benchmarking exercises comparing the council's maintenance spending with other authorities be considered by the Environment Select Committee.

Cllr Caroline Thomas, Cabinet Member for Transport, Street Scene, and Flooding, responded that much of the requested data was in the public domain or already reported to the Environment Select Committee annually, where

further questions could be raised on specific details. She stated a larger proportion of expenditure for surfacing works was on non-principle roads, and provided details of information from the Department for Transport. Cllr Jerry Kunkler, Chairman of the Environment Select Committee, said he would engage further over what information would be provided for the next report to the Committee.

The Leader added that the council's approach to road surfacing was not about balancing the books as it was capital spend not revenue, and that decisions on which areas received works were based on evidence and reporting, encouraging everyone to use the available reporting systems to raise concerns. He felt the question which had been submitted underplayed the severe consequences of poor financial management and not controlling costs appropriately.

Cllr Budden stated that rural communities felt neglected and that few things affected people more than road maintenance.

The Leader stated that the council would continue to maintain and fix roads, but that this could not take away focus from the many critical services the council undertook for vulnerable adults and children, where serious harm to lives could arise.

Cllr Dr Brian Matthew welcomed the proposals regarding air quality monitoring and asked about monitoring some areas as control areas to provide comparisons.

Cllr Martin Smith noted comments in the report on difficulty recruiting and retaining planning staff and sought details of the referenced planning transformation project. Cllr Botterill stated that performance metrics had improved in planning though there was a national issue for recruiting planning officers. The transformation programme might include restructuring the planning committee set up, as well as increasing enforcement, and developing specialist teams.

Cllr Smith also sought information on a capital bid to increase the grant from the Department for Education for school maintenance. Details were provided on challenges to find contractors and arrange works.

At the conclusion of discussion, and subject to an addendum report which would be prepared relating to the additional funding announced on 5 February 2024, it was then,

Resolved:

That Cabinet recommends to Council:

a) That a net general fund budget of 2024/25 of £485.772m is approved;

b) That the Council Tax requirement for the council be set at £351.077m for 2024/25 with a Band D charge of £1,805.73, an increase of £1.65 per week;

c) That the Wiltshire Council element of the Council Tax be increased in 2024/25 by the following:

i. A 2.99% general increase;
ii. Plus a levy of 2% to be spent solely on Adult Social Care;

d) That the Extended Leadership Team be required to meet the revenue budget targets for each service area as set out in Appendix 1 to this report, for the delivery of council services in 2024/25;

e) That the Extended Leadership Team be required to deliver the revenue savings plans for each service area as set out in Appendix 1 to this report, over the MTFS period 2024/25 to 2026/27;

f) That the changes in the fees and charges as set out in Appendix 4 are approved;

g) That the Capital Programme 2024/25 to 2030/31 is approved;

h) That the Capital Strategy set out in Appendix 2 is approved;

i) That the DSG budget as approved by Schools Forum is ratified;

j) That the Medium-Term Financial Strategy, the forecast balanced budget over the 2024/25 and 2025/26 financial years and the MTFS 2024/25 to 2026/27 is endorsed.

Reason
To enable the Cabinet to recommend to Council a balanced revenue budget for the financial year 2024/25 and to set the level of Council Tax.

To enable effective, transparent decision making and ensure sound financial management as part of the council's overall control environment.

The Cabinet also sets out the final assumptions being used in the budget for growth, inflation, demand for services, the estimated level of income from sales, fees and charges and the level of income estimated from core funding e.g. Council Tax, Business Rates and government grants as well as the level of reserves held and assessed by the council's Section 151 Officer, as required, to provide future financial resilience.

This provides the council with a MTFS to deliver on the Business Plan priorities and drives long term financial sustainability.

18 **Housing Revenue Account Budget Setting including Dwelling Rent Setting 2024/25**

Cllr Phil Alford, Cabinet Member for Housing, Strategic Assets, and Asset Transfer, presented a report on the proposed Housing Revenue Account (HRA) annual revenue budget, including rent setting, and the capital programme for 2024/25. It was stated in previous years the proposals had been included within the main budget report, but as a ringfenced account it had been agreed to consider the HRA proposals separately.

Details were provided of ongoing council house building and retrofitting programmes, and the consideration of the Housing Board of factors such as cost of living, rents being below those of other housing providers, and other cost factors.

Cllr Pip Ridout, Chairman of the Financial Planning Task Group, stated that additional training would be requested to improve ongoing understanding of the risks and monitoring of the HRA, with an approach to be agreed by the Overview and Scrutiny Management Committee and Environment Select Committee.

Cllr Gordon King thanked the Cabinet Member for the briefing provided, noting the importance of the report.

In response to queries Cllr Alford provided details of the proposed increase in rent, and the number of tenants it would impact being those who were not in receipt of universal credit, as well as rises in minimum wage being of a greater extent.

At the conclusion of discussion, it was then,

Resolved:

That Cabinet recommends Council:

a) **To note the draft budget estimates and proposals;**

b) **To approve the HRA Annual Revenue Budget for 2024/25 as described in the report and Appendix 1;**

c) **To approve the increase of 7.7% (CPI+1%) to Dwelling Rents and Garage Rents for 2024/25;**

d) **To approve the HRA Capital Programme for 2024/25 as described in the report and Appendix 2;**

e) **To note the reviewed and updated assumptions in the HRA 30-Year Business Plan as detailed in the report.**

Reason
To enable the Cabinet to recommend to Council a balanced budget (capital and revenue) for the HRA for 2024/25, and in so doing continue to provide services to tenants and investment in their homes.

To enable effective, transparent decision making and ensure sound financial management of the HRA as part of the council's overall control environment.

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At the conclusion of discussion, it was then,

Resolved:

That Cabinet recommends Council:

a) To note the draft budget estimates and proposals;

b) To approve the HRA Annual Revenue Budget for 2024/25 as described in the report and Appendix 1;

c) To approve the increase of 7.7% (CPI+1%) to Dwelling Rents and Garage Rents for 2024/25;

d) To approve the HRA Capital Programme for 2024/25 as described in the report and Appendix 2;

e) To note the reviewed and updated assumptions in the HRA 30-Year Business Plan as detailed in the report.

Reason
To enable the Cabinet to recommend to Council a balanced budget (capital and revenue) for the HRA for 2024/25, and in so doing continue to provide services to tenants and investment in their homes.

To enable effective, transparent decision making and ensure sound financial management of the HRA as part of the council's overall control environment.

19 **Treasury Management Strategy Statement 2024/25**

Cllr Nick Botterill, Cabinet Member for Finance, Development Management, and Strategic Planning, presented a report recommending the Council approve the Prudential and Treasury Indicators, together with the Treasury Management Strategy for 2024/25.

It was explained there were limited changes from the strategy statement for the precious year, and attention was drawn to the capital finance requirements, along with details of proposed borrowing need.

The Leader added that the report was a critical part of controlling and managing the cost of borrowing, which many councils had failed to understand.

Cllr Pip Ridout, Chairman of the Financial Planning Task Group, confirmed the group was supportive of the report and its recommendations.

Cllr Gordon King welcomed the report in setting out the roadmap for the council's treasury management.

At the conclusion of discussion, it was then,

Resolved:

That Cabinet recommends that Council:

a) Adopt the Minimum Revenue Provision Policy (paragraph 26 – 28);

b) Adopt the Prudential and Treasury Indicators (paragraphs 17 – 25, 41 – 47 and Appendix A);

c) Adopt the Annual Investment Strategy (paragraph 65 onwards);

d) Delegate to the Director of Finance and Procurement (S151 Officer) the authority to vary the amount of borrowing and other long-term

liabilities within the Treasury Indicators for the Authorised Limit and the Operational Boundary;

e) Authorise the Director of Finance and Procurement (S151 Officer) to agree the restructuring of existing long-term loans where savings are achievable or to enhance the long-term portfolio;

f) Agree that short term cash surpluses and deficits continue to be managed through temporary loans, deposits and money market funds;

g) Agree that any surplus cash balances not required to cover borrowing are placed in the most appropriate specified or non-specified investments, particularly where this is more cost effective than short term deposits; and delegate to the Director of Finance and Procurement (S151 Officer) the authority to select such funds;

h) Agree the Investment Policy (paragraph 69);

i) Agree the Creditworthiness Policy (paragraph 73).

Reason
To enable the Council to agree a Treasury Management Strategy for 2024/25 and set Prudential Indicators that comply with statutory guidance and reflect best practice.

20 **Public Transport Strategy**

Cllr Caroline Thomas, Cabinet Member for Transport, Street Scene, and Flooding, presented a report providing details of the results of the public consultation on a revised Public Transport Strategy, and seeking authorisation to adopt the Strategy as part of the existing Local Transport Plan.

Details were provided on the outcomes of the consultation, as well as background on challenges in the service area including shortages of bus drivers and increased costs. The high level of responses to the consultation was also noted. The strategy document would aid the council in meeting its statutory duties in line with its Bus Service Improvement Plan.

Cllr Nick Holder, Cabinet Member for Environment and Climate Change, noted comments in the report on new strategies aligning to the council's climate strategy, and work to undertake a joined-up approach to achieve this.

Cllr Jerry Kunkler, Chairman of the Environment Select Committee, confirmed the Committee had reviewed the report at its meeting on 11 January 2024 and provided comment.

Cllr Gordon King asked when the Local Transport Plan 4 would be completed, with it stated it was intended to be by the end of 2024.

A question from Colin Gale, Pewsey Community Area Partnership, was received as detailed in Agenda Supplement 2. He asked a supplementary question on how the council could improve public and elected Member understanding of the positive rollout of demand responsive transport (DRT) schemes, noting some of the comments from the consultation. He complimented the operation of DRT in the Pewsey area. Cllr Thomas stated there would be discussions with bus operators and the council's communications team to improve this.

Cllr Dr Brian Mathew commented on Link and community minibus schemes and what could be done to boost these services further. Cllr Thomas stated they provided an essential service, and the council did engage with them and provided some funding but would consider what more could be achieved through the wider public transport strategy.

Cllr Tamara Reay praised the operating zones for demand responsive transport and looked forward to being extended to other rural areas where possible.

Cllr Tony Jackson asked about extending DRT provision to include taxi operators. Cllr Thomas stated there were some schemes looking at the use of taxis instead of buses for DRT and the council was happy to consider this, but this was subject to potential restrictions on government funding.

At the conclusion of discussion, it was then,

Resolved:

That Cabinet approve the revised Public Transport Strategy at Appendix 1.

Reason
To ensure that Wiltshire Council's supported public transport continues to deliver appropriately for Wiltshire residents and its visitors, considering changing travel habits and a challenging operational and financial market.

21 Wiltshire Design Guide - Adoption as a Supplementary Planning Document (SPD)

Cllr Nick Botterill, Cabinet Member for Finance, Development Management, and Strategic Planning, presented a report recommending Cabinet endorse the amended Wiltshire Design Guide as set out in Agenda Supplement 2, and recommend Council adopt it as a supplementary planning document.

Details were provided on the extent of consultation on the design guide, to expand upon Core Policy 57 to ensure high quality design and place shaping and provide a framework for this for developers to utilise.

The Leader stated it was unfortunately not practical to develop a compulsory design code, and the proposed design guidance would be a positive and impactful addition to the planning documents.

Cllr Laura Mayes, Deputy Leader and Cabinet Member for Children, Education, and Skills, drew attention to the guide's support for attached housing informed by the character of the location.

Cllr Jerry Kunkler, Chairman of the Environment Select Committee, stated the design guide had been reviewed by the Committee in 2023 prior to consultation. He had been further briefed on 8 January 2024 on amendments to the guide and was supportive of the proposals.

Cllr Gordon King agreed development of a design guide was a positive step and was hopeful it would encourage developers to choose more appropriate designs for local settings.

At the conclusion of discussion, it was then,

Resolved:

That Cabinet:

a) **Notes the response to the consultation on the draft Wiltshire Design Guide Supplementary Planning Document (the WDG) set out in the Consultation Statement at Appendix 1.**

b) **Endorses the amended WDG as set out in Appendix 2.**

c) **Approve the referral of the final version of the WDG (Appendix 2) to Council on 20 February 2024 for adoption as a supplementary planning document.**

d) **Subject to approval of Council, delegate to the Corporate Director, Place, in consultation with the Cabinet Member for Finance, Development and Strategic Planning, the power to undertake the final stages associated with the formal adoption and publication of the WDG, including any minor textual changes in the interests of clarity and accuracy.**

Reason
To ensure that the Wiltshire Design Guide is formally adopted as a Supplementary Planning Document (SPD) that provides guidance to developers that supports Core Policy 57: Ensuring high quality design and place shaping.

In a change to the agenda order the Revised Nutrient Neutrality Strategy was taken after consideration of the Proposed Closure of Shalbourne Church of England Primary School and the School Admissions Policy 2025/26.

22 **Proposed Closure of Shalbourne Church of England Primary School**

Cllr Laura Mayes, Deputy Leader and Cabinet Member for Children, Education, and Skills, presented a report on the proposal to close Shalbourne Church of England Primary School.

It was explained that pupil numbers had dropped to such a degree that retaining the school at Shalbourne was not viable. All necessary consultation had been undertaken and it was confirmed all remaining children had been found alternative schooling.

Cllr Gordon King noted the impact that closing a local school could have on a community, but accepted the numbers in this case left no alternative.

The Leader commented on trying to work through the Local Plan to develop more housing in appropriate fashion in villages to ensure longer term viability for communities.

At the conclusion of discussion, it was then,

Resolved:

That Cabinet approve the proposal to close (without modification) Shalbourne Church of England Primary School with effect from 30 April 2024.

Reason
With pupil numbers now so low, with slim prospects of recovery, Shalbourne Church of England Primary School is both financially and academically vulnerable, therefore closure is considered the only viable option.

23 **School Admissions Policies 2025/26**

Cllr Laura Mayes, Deputy Leader and Cabinet Member for Children, Education, and Skills, presented a report on the elements of the Admissions Policy required to be determined by Cabinet. She noted the complexity of the schemes but reflected that it was a very open and transparent system which had generated very few queries or complaints from parents over many years.

The Leader stated the policy worked well each year.

Cllr Gordon King stated the admissions process was well administered, and the council could reassure people that sufficient places existed to meet demand.

At the conclusion of discussion, it was then,

Resolved:

That Cabinet approve the appended schemes which will become the determined Admissions Policy for Wiltshire for 2025/26.

Reason
It is a legal requirement to have these policies in place.

The schemes and arrangements as presented have been sent out to all schools for consultation and no alternative suggestions have been received to date.

24 **Revised Nutrient Neutrality Strategy**

Cllr Nick Botterill, Cabinet Member for Finance, Development Management, and Strategic Planning, presented a report providing details on government announcements and changes to legislation in relation to nutrient neutrality, and proposals to update the council's strategic approach to securing phosphorus neutral development in the catchment area of the River Avon (Hampshire) Special Area of Conservation.

It was explained that the special area of conservation encompassed nearly a third of Wiltshire. Government announcements in December 2023 required an update to the council's approach. Funding would be provided for the council to commit to interventions that mitigate phosphorus impact from new development. The grant fund must be recharged and developer contributions via planning obligations are sought to do so.

Cllr Botterill stated in some cases developers would undertake their own mitigation, or there would be mitigation through a wider council scheme.

The Leader noted that agriculture and sewage treatment were much more significant in their impact on nutrient issues.

Cllr Jerry Kunkler, Chairman of the Environment Select Committee, stated he had received a briefing from officers on 7 December 2023, and endorsed the strategic approach set out in the report.

Cllr Gordon King accepted the need for the proposals, and that it would be a lengthy and complex process.

Cllr Richard Budden commented on grant schemes for septic tank upgrades, farmers monitoring river pollution across the Wylye Valley, and whether the funding provided could be used to support farmers outside the area of outstanding natural beauty. Cllr Botterill stated the funding provided could only be utilised specifically in relation to development mitigation.

Cllr Martin Smith made a comment on water quality monitoring in other areas such as in the catchment for the Bristol Avon.

At the conclusion of discussion, it was then,

Resolved:

That Cabinet:

a) Confirms that the Council will, until such time as the responsibility falls to others, continue to deliver a Council-led strategic approach (as set out in (ii and iii)) to secure in perpetuity measures to ensure

qualifying development is phosphorus neutral in the catchment for the River Avon (Hampshire) Special Area of Conservation;

b) Agrees that developer contributions via planning obligations will be sought from developers wishing to use the Council-led scheme where mitigation is available;

c) Agrees that in accordance with the requirements of the Habitats Regulations and case law the revised strategic approach applies to all housing and overnight accommodation (and other qualifying development) in the River Avon SAC catchment seeking outline, full, reserved matters and discharge of condition approval;

d) Delegates authority for the Corporate Director of Place in consultation with the Cabinet Member for Finance, Development Management and Strategic Planning approval to:

i. Oversee delivery of this strategic approach including approving any policy/process documents needed to support implementation of the revised strategy;
ii. Accept the Local Nutrient Mitigation Fund grant as lead authority for the Hampshire Avon catchment;
iii. Spend of the Local Nutrient Mitigation Fund and delivery of nutrient interventions in line with grant conditions;
iv. Oversee and approve the preparation and public consultation of a Local Development Order (LDO) to replace septic tanks with package treatment plants.

Reason
To demonstrate the council's commitment to the delivery of a revised strategic solution to secure phosphorus neutral development.

25 **Wiltshire Council's Housing Board - Annual Report**

Cllr Phil Alford, Cabinet Member for Housing, Strategic Assets, and Asset Transfer, presented a report on the annual activities of the Wiltshire Council Housing Board and performance across the Housing Revenue Account service.

Details were provided of progress with retrofit programmes, scrutinising work of the Housing service, re-procurement of maintenance contracts and the work of tenancy sustainment officers securing over £800k in additional income for tenants.

The Leader praised the work of the Board in the last year.

Cllr Jerry Kunkler, Chairman of the Environment Select Committee, stated the Committee received regular updates from the Housing Board, most recently at its meeting on 11 January 2024, where they had sought information on the council house building programme, developing an improvement plan, and details on heat pumps.

At the conclusion of discussion, it was then,

Resolved:

That Cabinet note the annual report.

Reason
Wiltshire Council Housing Board (WCHB) Terms of Reference require an Annual Report to be presented to WCHB AGM and Cabinet.

26 **Urgent Items**

There were no urgent items.

(Duration of meeting: 10.00 am - 1.25 pm)

The Officer who has produced these minutes is Kieran Elliott of Democratic Services, direct line 01225 718504, e-mail committee@wiltshire.gov.uk

Press enquiries to Communications, direct line 01225 713114 or email communications@wiltshire.gov.uk

These decisions were published on 8 February 2024 and will come into effect on 15 February 2024.

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Future of Community Services Across BSW

Background:

Bath and North East Somerset, Swindon, and Wiltshire (BSW) Integrated Care Board (ICB) initiated a strategic programme in the Autumn of 2022 called the Integrated Community Based Care (ICBC) Programme.

This programme aims to enable the delivery of a long-term transformed model of Community Services. It is informed by the Primary and Community Delivery Plan and works alongside the other Integrated Care System (ICS) strategic transformation programmes including Primary Care, Elective Recovery, Urgent and Emergency Care, Mental Health and Learning Disabilities, Autism and Neurodivergence.

The Purpose of this Document:

This document aims to provide an update to key stakeholders of the ICBC Programme, ensuring they continue to be informed about the scope, approach, context, core principles, outcomes and timeline. While this document will be available in the public domain, it is important to note that it does not substitute for a complete update for those who are unfamiliar with the programme. We are very grateful to you for your ongoing support and interest in this programme and we look forward to continuing to work with you over the coming months.

Commissioning Approach and Context:

The ICBC Programme will enable service contracts inherited from three separate Clinical Commissioning Groups (CCGs) to be rationalised. Contracts covering both Health and Social Care for people at every stage of their lives, will be developed in a way that minimises unwarranted variation and bring about harmonisation in the scope and level of services commissioned across BSW. The new contracting arrangements will also support recruitment and retention of our valued workforce and support the following commissioning priorities:

- Improvements in health and care outcomes
- Fairer health outcomes across the whole BSW population
- Improvements in the experience of care as rated by service users
- Improvements in the experience of delivering care as rated by health and care professionals
- Improvements in the efficiency with which care is delivered
- Increased relative investment in initiatives/services associated with prevention of ill-health
- Improvements in the sustainability of care services, including environmental sustainability
- Reductions in the rates of avoidable attendances and admissions

Core Principles:

The following core principles were developed with stakeholders and partners to underpin our approach to the recommissioning of community-based health and care services.

The core principles associated with the provision of community-based care
1. Population focussed
2. Informed by the experts and those with Lived Experience
3. Rewarding roles and careers
4. Support delivery of the BSW Together 'Integrated Care Strategy'
5. Consistency of service offer

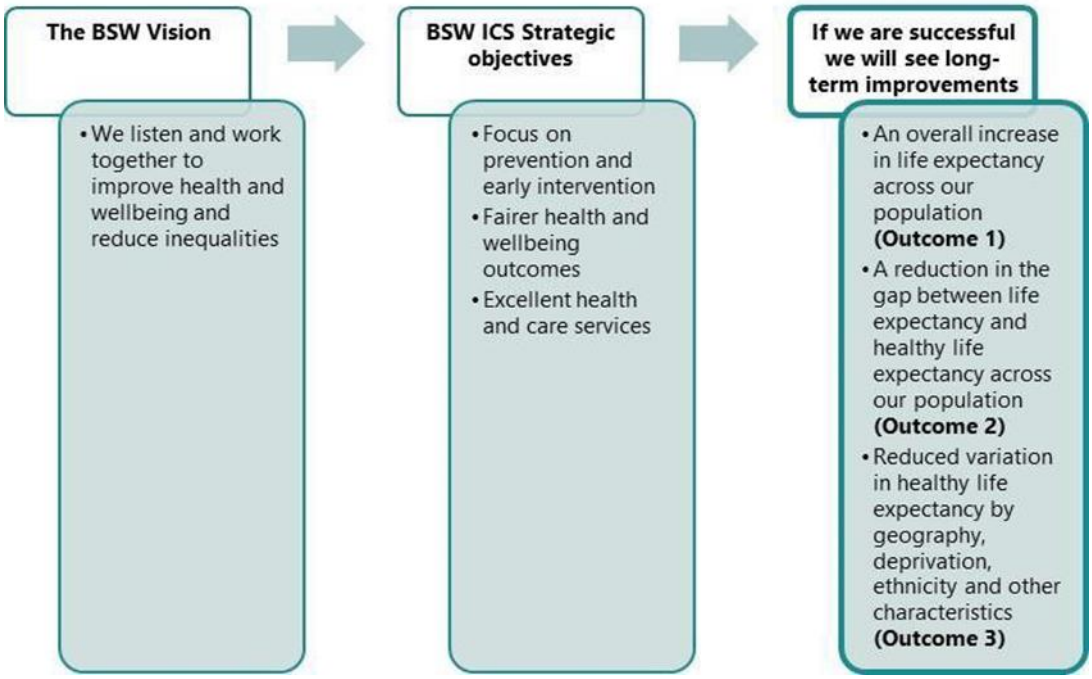
Principles specifically associated with this commissioning process
1. Specification of requirements
2. Scope of requirements
3. Work collaboratively
4. Focus on value for money
5. Use technology better
6. Achieve environmental sustainability
7. Allow time for innovation and collaboration

The Outcomes:

The ICB approach to this procurement is to commission for outcomes where possible, with services described in an integrated manner, rather than as a series of specifications for individual services.

The ICB has invested time in developing the transformation priorities and an associated outcomes framework, which replaces the traditional multiple contracts and multiple specifications. The framework sets out the overarching outcome measures to measure progress on delivering the long-term improvements of the Integrated Care Strategy along with contributing outcome measures that are intended to monitor progress in the short to medium term.

The image below shows how the BSW Vision links with the BSW ICS strategic objectives, and how this has informed the long-term improvements that have shaped the strategic outcomes for the ICBC Programme and are woven throughout the transformation of community services.



Timeline and Key Milestones:

The programme received approval to move to a formal, phased procurement process last Autumn, using established procurement frameworks and subject to the confidential, commercial requirements that govern all public sector procurement processes.

Potential providers capability and capacity has been tested through the SQ process and successful potential providers have been notified through the procurement framework.

Month	Phase	Progress
October 2023	Commencement of Selection Questionnaire (SQ) phase	Complete
February 2024	Commencement of Invitation to Negotiate (ITN)	On track
September 2024	Award of contract	
September 2024 – March 2025	Transition and mobilisation of services	
April 2025	Commencement of fully transitioned services under the new contract	

The procurement process now enters a two-stage negotiation phase that will run until July 2024. The award of any contract following this period is expected in September 2024. At this point work will begin to transition services into the new provider ready for commencement of the contract on the 1st April 2025.

If you need to contact the ICBC Programme team, the email address is bswicb.bsw-icbc@nhs.net. However, please be aware that the ICBC Programme is currently in a formal procurement process and that normal business and communications will continue with our current providers. Further communications will be shared following the contract award, unless there are deviations from the timeline or if exceptional circumstances arise.

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Wiltshire Council

Cabinet

19 March 2024

Subject: **Arts Council Music Hub Investment Programme**

Cabinet Member: **Cllr Laura Mayes - Deputy Leader and Cabinet Member for Children's Services, Education and Skills**

Key Decision: **Key**

Executive Summary

The purpose of this report is to:

- Request Cabinet to delegate the authority to Director of Education in consultation with the Cabinet Member for Children Services, Education and Skills, to finalise subsequent operational matters, and agreement of contract terms if we are successful in being offered the music education Hub Lead Organisation 'contract' by Arts / Council.

- In accordance with the Arts Council's Hub Investment Programme, three local authority areas are being combined (Wiltshire, Swindon, and Gloucestershire) to provide strategic leadership for the delivery of music education in schools and community settings.

- Arts Council England have invited applications to become that Hub Lead Organisation (HLO) and building on the Wiltshire Music Connect model, Wiltshire has bid to be the HLO. Gloucestershire and Swindon have also made a bid to become the HLO and following assessment, Arts Council will announce a decision in April 2024 with the new structure to be active from September 2024.

- Between April and September 2024 there will a number of decisions which need to be made swiftly in order to meet the funder's specifications & requirements: Staffing, Governance, commissioning of activity in Gloucestershire and Swindon and Wiltshire inclusive, from small and voluntary community organisations not necessarily familiar with Local Authority procurement (in order to build longer term capacity)

- The combined value of the DfE / Arts Council grant for the new combined HLO area is estimated at £1.7m per annum and it is anticipated that delegating the authority to the Director of Education and Skills will facilitate timely procurement to tie in with the Arts Council timetable.

Proposal

Cabinet is recommended to approve:

To delegate authority to the Director of Education and Skills, after consultation with the Cabinet Member for Children, Education, and Skills, to agree contract terms, approve any final operational matters and facilitate timely procurement to tie in with the Arts Council and Department for Education timelines, in the event the council is successful in being offered the music education Hub Lead Organisation 'contract' by the Arts Council.

Reason for Proposals

- This will give Wiltshire Council and Wiltshire Music Connect the opportunity to enter into funding agreements with The Arts Council in a timely manner.

- It will also enable a swift transition to become the Hub Lead Organisation should Wiltshire be selected as the lead for Wiltshire, Swindon, and Gloucestershire from 1 September 2024.

- This will facilitate timely procurement to tie in with the Arts Council timetable.

Lucy Townsend
Corporate Director, People

Wiltshire Council

Cabinet

19 March 2024

Subject: **Arts Council Music Hub Investment Programme**

Cabinet Member: **Cllr Laura Mayes - Deputy Leader and Cabinet Member for Children's Services, Education and Skills**

Key Decision: **Key**

Purpose of Report

1. To request Cabinet delegate authority to the Director of Education and Skills, after consultation with the Cabinet Member for Children, Education and Skills, to agree contract terms, approve any final operational matters, and facilitate timely procurement to tie in with the Arts Council and Department for Education timelines in the event the council is successful in being offered the music education Hub Lead Organisation 'contract' by the Arts Council.

Relevance to the Council's Business Plan

2. Wiltshire Music Connect and the music education hub's contribution to the Business plan can be summarised as follows and all benefits are expected to continue and in many cases be enhanced should HLO status be secured:

3. Empowered people - engaging and supporting 99% Wiltshire schools and their communities through a variety of interventions inc. musical clusters, subsidies, school music recovery fund and project funding. Much of this work is aligned to wider School Effectiveness projects and links with other services e.g. Virtual School and Youth Voice.

4. Resilient society - specific measures and support for disadvantaged and vulnerable young people. Subsidy scheme, training for staff, remissions on instruments and provision all tackling disadvantage and supporting inclusivity.

5. Thriving economy **–** continuing to support a music (education) economy in Wiltshire with a wider est. value of £2-3m per annum and involving approx.150 small businesses.

6. Sustainable environment – Developing and trailing innovative approaches (inc. Digital Innovation (See above) that can eventually impact on travel and reach, pedagogy, and engagement.

7. Wiltshire Council – multiple in-county partnerships with schools, providers, and agencies.

Background

8. Wiltshire Music Connect (WMC) is the music education hub for Wiltshire as defined by Department for Education (DfE)'s National Plan for Music Education. Within Education and Skills, WMC has been the hub lead organisation (HLO) since September 2012 and following the closure of Wiltshire Music Service in 2015 evolved into a purposely future facing model which clearly differentiation between strategy (led by a small team working consultatively) and a pool of quality assured provider tutors and organisations (our Associates).

9. Wiltshire Council acts as the agent to receive and account for a grant of approximately £0.620m per annum from DfE via Arts Council England (ACE). This contributes to a wider music education economy of over 130 freelance businesses and approximately twenty-five music / cultural organisations in the county with an estimated turnover of £2.0-3.0m per annum.

10. The model now has the engagement of 99% county schools with depth of engagement increasing year on year.

DfE Changes to the Music Landscape

11. Following publication of a revised National Plan for Music Education in summer 2022, DfE and ACE have set out plans for a Music (Education) Hub Investment programme.

12. From September 2024 there will be significantly fewer hub lead organisations (HLOs). There are currently approximately 120 and they have set out a plan for approximately forty.

13. They will cover geographies *prescribed* by DfE / ACE.

14. It will be an open bidding process and no existing hub lead organisations can *assume* that they will be successful in securing future grant aid. It is possible therefore (but unlikely we feel) that Wiltshire Music Connect is no longer funded from September 2024.

Timeline:

15. Deadline for applications to Arts Council; 12 October 2023

16. Arts Council "expect" to tell us in April 2024 whether we have been made a conditional offer of funding. Conditional *implies* the likelihood of additional requirements / adjustments to secure the grant. How much this may delay a definite decision is unclear.

17. April – August 2024 time for adjustments to plan and in Wiltshire's case the recruiting of staff to fill (2) vacant posts (or, in a worst-case scenario redundancy notices).

18. New HLOs will receive funding to co-ordinate and lead their Music Hubs from September 2024. Following the first year, future funding is "planned," subject to the outcome of the next government Spending Review

Explanation of Regionalised Hubs

19. DfE / ACE have grouped Wiltshire with Swindon and Gloucestershire, and we were asked to have discussions on working together towards a proposal for a partnership bid.

20. There will need to be one Hub Lead Organisation (HLO) overseeing headline strategy, finance, and monitoring and with its own Governance and an independent Chairperson. That HLO and its Governance will have the relationship with ACE / DfE and will be accountable for its decisions and use of public funding.

21. At the time of writing, it has not yet been agreed who will host the HLO function and receive the grant. We are not aware of any potential rival bids from beyond the named hubs we are working with.

22. Whilst each area will have a localised plan and delivery partners, it is expected that, over time, centralised functions will increasingly be developed to achieve economies of knowledge / experience / scale. Examples include training / CPD, communications and resources.

23. This would inevitably mean that less of the collective DfE grant (estimated at £1.7M for academic year 24-25) would filter down to localised delivery / strategy and part of the HLO role would also be to support regional and local partners' income generation and fundraising from a wider range of sources.

24. The changes and perceived benefits are also likely to be in anticipation of future cuts to Government's funding for music education, but this has not been stated within the rationale or cited as the purpose for these changes.

Impact on Wiltshire

25. The greatest risk we see is that whilst we wait for the other areas to catch up and embrace the strategy expected of HLOs, our strategic work in Wiltshire is slowed down or impaired. Similarly, if we are not chosen to lead, our ability to continue our successful trajectory may be impaired and we may be at the behest of others' decisions.

26. Many of our systems / approaches have been designed to be upscale-able or adaptable to other areas.

27. In a model like Wiltshire's, future emphasis on centralised strategy would not hit delivery as hard as some, because our current use of grant aid is not significantly invested in any one delivery agent or scheme.

28. With regards Governance, whilst operating within Wiltshire Council's structure, Wiltshire Music Connect has developed independent governance on two tiers (Board and Experts) and in doing so has demonstrated an innovative model for how a local authority can continue to 'deliver' services in a different and sustainable way even if it is not in a position to fund them.

Main Considerations for the Council

29. Wiltshire has a strategic model which is doing well and, with its stakeholders, is already 8 years into a journey of progressive change undertaken in a realistic and consultative manner. We have plenty to learn but also much (including mistakes) to share. If Wiltshire is not appointed as the HLO there could be some risk to its future development & impact.

30. There will be a need to distribute significant parts of a £1.7m grant to strategic and/or delivery partners in Swindon & Gloucestershire, without lengthy procurement processes, as that would jeopardise the basis on which the grant was awarded.

31. Initially ACE wanted employee information from existing Hubs regarding existing and potentially future TUPE arrangements. Whilst plans now are suggesting a partnership approach with portions of existing staff time allocated to collective work, it is possible that in the longer term a more formal arrangement may be required with TUPE related implications.

Safeguarding Implications

32. No impact identified for the decision requested.

Public Health Implications

33. No impact identified for the decision requested.

Procurement Implications

34. An above services threshold FTS (Finder a Tender Service) procurement will be undertaken with an approximate publishing date in April 2024, following the Public Contract Regulations (2015).

35. An above services threshold FTS (Finder a Tender Service) procurement will be undertaken as one procurement exercise split into Lots.

36. This is a relatively straight forward above threshold procurement, with the main focus needing to be on the pricing document and service specification with a like for like evaluation process to reduce any ambiguity between the Lots. Focus on the quality questions and format of the service specification linking-in consistently with the pricing document will ensure that this can be achieved.

Equalities Impact of the Proposal

37. No impact identified for the decision requested.

Environmental and Climate Change Considerations

38. Any proposal leading to future procurement has the opportunity to incorporate environmental and climate change considerations through the procurement process.

39. Whilst no impact has been identified for the decision requested, it is fully understood that procurement and climate change teams can help with relevant questions to include in the tender, and requirements in the contract (appropriate to the size of the

businesses likely to tender, size/spend of contract, and relevant to the nature of the contract).

Workforce Implications

40. No impact identified for the decision requested.

41. HR advice will be sought as appropriate as it is anticipated that a new structure will be required to service the new Hub Lead Organisation and existing locality offers to service Wiltshire, Swindon, and Gloucestershire. At this stage, there are no specific guidance notes available on The Arts Council expectations for this, but we will be expected to have appropriate levels of staffing and experience at equitable pay rates.

Risks that may arise if the proposed decision and related work is not taken.

42. The Arts Council have set a very challenging timescale from appointment of Hub Lead Organisation to delivering the new service, and any delays in signing contracts with The Arts Council in regard to grant funding and allocations could affect a delay in the start date which would impact schools and their children across all three LA areas from 1 September.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks.

43. A clear risk for us is that our leadership of a new HLO immediately encounters reputational issues because of Arts Council or indeed other bureaucratic processes.

44. Ahead of an Arts Council decision we have been collaborating with colleagues in Procurement & Legal to map out a timescale and requirements to move swiftly to advertise, receive bids for and appoint funds to strategic and delivery partners in / for the other LA areas.

45. We are also considering the staffing implications for our central operation.

46. In terms of delivery to young people and schools, our Year 1 proposals will seek to ensure continuity wherever possible whilst being clear about longer term (i.e. Year 2 onwards) changes that those working in the sector should expect and plan for in advance.

Financial Implications

47. The Council currently acts as grant recipient and accountable body on behalf of the music service and as such is legally able to accept and passport the funding to fund the various delivery routes. Should the HLO be accepted by the Arts Council to include Swindon and Gloucestershire, the grant will increase accordingly and more funding passported. Financial risk to the local authority is largely unchanged and minimised by following procurement and legal advice and we would be confident of value for money and maximisation of the grant to extend the delivery of music services to pupils in Wiltshire's young people.

Legal Implications

48. Legal Services are fully engaged in this matter and will provide advice on any agreements with the Arts Council, Swindon and Gloucestershire, and strategic and delivery partners, as required. Legal Services will also provide support in respect of procurement and subsidy control considerations as appropriate.

Overview and Scrutiny Engagement

49. The opportunity to brief an appropriate committee on the decision request is being considered.

Options Considered

50. In working through the HLO application process, we (inc. Wiltshire Music Connect's Board) considered a number of scenarios / options:

51. That Wiltshire Music Connect emerged from cross-hub discussions as the best entity to lead the new HLO with Wiltshire Council as accountable body. This would have paved the smoothest way forward but did not happen as Glos & Swindon did not want us to lead.

52. That Wiltshire Music Connect did not bid to become HLO but continued to lead on most things in Wiltshire (receiving a slightly reduced level of the DfE grant from the HLO) and was contracted by the HLO to deliver some wider services to Swindon & Glos. This remains possible but we do not have clarity on our rivals plans / proposals, and we would lose control.

53. Wiltshire Music Connect did not bid to become HLO but continued to lead on most things in Wiltshire (receiving a slightly reduced level of the DfE grant from the HLO) but no wider services to other LA areas. As above.

54. That a rival bid from outside the three current music hubs were chosen. Arts Council will not tell us if there were any bidders other than the combined Glos & Swindon bid. We think we would have heard by now through other routes, but it is not impossible.

55. Do nothing and run the high risk of Wiltshire Music Connect and its approaches / networks being marginalised or losing all funding.

Conclusions

That authority is delegated to the Director of Education and Skills, after consultation with the Cabinet Member for Children, Education, and Skills, to agree contract terms, approve any final operational matters and facilitate timely procurement to tie in with timelines from the Arts Council and Department for Education, in the event the council is successful in being offered the music education Hub Lead Organisation 'contract' by the Arts Council.

Kathryn Davis - Interim Director for Education and Skills

Report Author: Paul Redford, Head of Traded Services,
Paul.Redford@wiltshire.gov.uk, Tel: 01225 770459

Appendices

None

Additional Information and Reading:

Wiltshire Music Connect; www.wiltshiremusicconnect.org.uk

Music Hub Investment Programme; https://www.artscouncil.org.uk/our-open-funds/music-hub-investment

Guidance; https://www.artscouncil.org.uk/sites/default/files/2023-07/Music%20Hub%20Investment%20Programme%20Guidance%20for%20Applicants%2006.07.23.pdf

Proposed areas and allocations;
https://www.artscouncil.org.uk/media/21513/download?attachment

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Wiltshire Council

Cabinet

19 March 2024

Subject:	**Air Quality Action Plan 2024-2029**
Cabinet Member:	**Cllr Nick Holder - Cabinet Member for Environment and Climate Change**
Key Decision:	**Key**

Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of the Council's statutory duties under the Local Air Quality Management framework. It outlines the actions we will take to improve air quality in Wiltshire from 2024 to 2029.

Where the Council find areas that do not comply it must declare an Air Quality Management Area and put an Action Plan in place to reduce pollution to compliant levels. Wiltshire Council has eight Air Quality Management Areas (AQMAs) in respect of the annual mean objective for nitrogen dioxide with several of these areas now close to compliance.

The existing Air Quality Action Plan (AQAP) is out of date and not in a format that meets the Department of Environment, Food and Rural Affairs' (DEFRA) current model. The Environment Act 1995 (as amended in 2021) requires that Action Plans be periodically reviewed. Although no time limit is set by DEFRA, their guidance documents suggest a review should occur no later than every five years. This draft Action Plan complies with the requirements now enshrined in the above Act.

This AQAP has already undergone consultation with the following:

1. Key internal departments and partners including transport, highways, public health, spatial planning, climate change, Highways England, neighbouring local authorities, the Environment Agency and DEFRA.

2. Members of the public through a 6 week consultation exercise

3. The Council's Climate and Environment Forum

4. Cabinet

The above consultation has resulted in changes being made to the document where appropriate.

Proposal

That Cabinet adopt the Air Quality Action plan.

Reason for Proposal

To meet the legal requirements of the Environment Act 1995 (as amended in 2021)

Parvis Khansari
Corporate Director, Place

Terence Herbert
Chief Executive

Wiltshire Council

Cabinet

19 March 2024

Subject:	**Air Quality Action Plan 2024-2029**
Cabinet Member:	**Cllr Nick Holder - Cabinet Member for Environment and Climate Change**
Key Decision:	**Key**

Purpose of Report

1. To seek Cabinet adoption of the Air Quality Action Plan.

Relevance to the Council's Business Plan

2. The Wiltshire Council Business Plan 2022 - 2032 recognises Wiltshire Council takes responsibility for the environment and in doing so is committed to enable everyone to have access to cleaner air. The Action Plan is a key document in assisting the Council to achieve this, as well as having an important role in encouraging sustainable development.

Background

3. The Council is obliged by the Environment Act 1995 to monitor air quality with respect compliance with UK air quality regulatory requirements. This is known as the "Local Air Quality Management" Regime.

4. Where the Council find areas that do not comply it must declare an Air Quality Management Area and put an Action Plan in place to reduce levels to compliant levels. Wiltshire has 8 AQMAs in respect of the annual mean objective for nitrogen dioxide. Several of these are close to compliance and subject to further data demonstrating compliance may be revoked in the coming years.

5. The existing Air Quality Action Plan (AQAP) is out of date having been published in 2015.

6. The Government has tightened the law in this area following the loss of several key court cases in the Supreme Court, which ruled it should achieve air quality standards in the shortest possible time. It now looks to local authorities to find solutions. The Secretary of State has directed a number of Local Authorities to establish Clean Air Zones. It has introduced the Environment Act 2021 which amends the 1995 Act and associated guidance to include more detail in terms of what an action plan should contain i.e. what measures will be taken, when, the quantified impact on air quality and when compliance will be achieved. This new action plan has been drafted using DEFRAs own template to ensure compliance with the new legislation.

7. Having an updated and adopted AQAP will assist the Council in bidding for DEFRA grant funding in future.

8. Extensive consultation has already taken place with:

- Cabinet,
- The Council's Climate and Environment Forum,
- Key partners including transport, highways, public health, spatial planning, climate change, Highways England, neighbouring local authorities,
- the Environment Agency
- DEFRA, and
- Members of the public via a 6-week consultation exercise

Main Considerations for the Council

9. Adopting a new AQAP with ensure legal compliance with the Environment Act 1995 (as amended in 2021),and enable opportunities to submit bids to DEFRA for funding. Such bids will involve other services and assist them in delivery of their objectives where it can be argued there will be a positive impact on Air Quality.

10. The plan can be used by other services to support other funding bids outside of the DEFRA Air Quality framework, e.g. Future High Streets, Bus passenger strategy, LCWIPs.

11. The plan can be used to boost the Council's ability to require developers submitting relevant planning applications to meet a higher standard of air quality mitigation, including additional Section 106 funding towards measures contained within the AQAP via the forthcoming air quality supplementary planning document (SPD).

Overview and Scrutiny Engagement

The Climate Emergency Task Group will be briefed on the Plan on 15 March 2024.

12. This AQAP has already undergone consultation with the following:

1. Key partners including transport, highways, public health, spatial planning, climate change, Highways England, neighbouring local authorities, the Environment Agency and Defra.

2. Members of the public via a 6 week consultation exercise

3. The Council's Climate and Environment Forum

4. Cabinet

This consultation has resulted in changes being made to the document where appropriate. Details of the public consultation outcome are provided separately as an appendix to this report.

Safeguarding Implications

13. None

Public Health Implications

14. The objective of the action plan is to improve health outcomes and wellbeing for those in more polluted areas so reducing health disparities. It is estimated that the annual mortality of manmade air pollution in the UK is roughly equivalent to between 28,000 and 36,000 deaths every year. It is estimated that between 2017 and 2025 the total cost to the NHS and social care system of air pollutants (fine particulate matter and nitrogen dioxide), for which there is more robust evidence for an association, will be £1.6 billion.

Procurement Implications

15. There are no direct procurement issues. The plan will allow future opportunities to bid for central government and section 106 funding as detailed above.

Equalities Impact of the Proposal

16. None

Environmental and Climate Change Considerations

17. The AQAP supports environmental improvements and the reduction in nitrogen dioxide and carbon vehicle emissions. It seeks to promote the use of cleaner electric vehicles, car clubs and e-bike schemes, active travel, increase cycle use and improvements to public transport. Travel by sustainable, public transport also enables passengers to have more active journeys which also has health outcomes. The Action Plan links to other Council plans and strategies (such as Climate Strategy, Green and Blue Infrastructure Policy and Environmental Policy) and supports cross service working to achieve common goals.

Workforce Implications

18. The Action Plan will require monitoring of progress towards the identified measures, including carbon reduction, with active engagement and a one council approach with officers from other departments such as transport and highways. This work will be done within existing staff resources. Other workforce impacts include the continued monitoring and maintenance of air quality monitoring equipment and the production of the Annual Status Report to DEFRA on progress achieved towards the detailed measures contained in the Action Plan.

Risks that may arise if the proposed decision and related work is not taken

19. Failure to adopt the AQAP and regularly review the actions in it constitutes a breach of the Council's statutory duty and risks exposing the local community to poor air quality. In addition, DEFRA monitor the reporting of action plans across the county and has powers to issue a Section 85 EA 1995 secretary of state direction to chief executives of local authorities that fail to comply with the legal requirements of the Environment Act 1995 (as amended in 2021). The adoption of this action plan will ensure the Council complies with its statutory duty. In addition, there will be a high risk of loss of future DEFRA funding, and the loss of future Section 106 funding from developers towards of cost of mitigation measures.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

20. Adopting the AQAP will secure compliance with the Council's statutory responsibilities. The ongoing risk is that the Council fails to reduce air quality below target levels and deliver on its action plan. This risk can be mitigated by adopting this action plan to allow the implementation and prioritisation of key mitigation measures to reduce air quality to begin.

Financial Implications

21. The adoption of the new AQAP will ensure legal compliance with the Environment Act 1995 (as amended in 2021) and so enable opportunities to submit bids to DEFRA for funding. Such bids will involve other services and assist them in delivery of their objectives where it can be argued there will be a positive impact on Air Quality.

22. The plan can also be used by services to support other funding bids outside of the DEFRA Air Quality framework.

23. Failure to adopt the AQAP could result in the loss of future DEFRA funding.

Legal Implications

24. Part IV of the Environment Act 1995 (as amended in 2021) places a duty on the local authority to monitor air quality in its areas and report to DEFRA on an annual basis. Adoption of the AQAP meets this statutory requirement.

Options Considered

25. The Environment Act 1995 places a duty of the Council regarding air quality. There is an option not to adopt the AQAP. However, failure to adopt this AQAP would have both reputational and service delivery consequences and would result in criticism of the Council by DEFRA and risk further action by way of Secretary of State direction.

Conclusions

26. Adoption of the AQAP by Cabinet is sought.

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Appendices

Appendix 1 - Air Quality Action Plan 2024 – 2029.
Appendix 2 - Public consultation comments and responses attached.

Background Papers

None

Air Quality Action Plan for Wiltshire

FINAL

2024- 2029

Wiltshire Council

Wiltshire Council
Draft Air Quality Action Plan

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

2024 - 2029

Local Authority Officers	G Tomsett, B Warren, P Nobes
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Report Reference number	WC AQAP 2024 - 2029
Date	January 2024

Foreword

Residents, businesses, and visitors to Wiltshire are able to enjoy extensive areas of unspoilt countryside and a high-quality environment. Air quality over the majority of Wiltshire is very good.

Local authorities have a duty to review and assess air quality under the “Local Air Quality Management Regime” introduced by the Environment Act 1995 (EA95). Review and Assessment has established air quality over the majority of Wiltshire is extremely good but there are a number of areas within our towns & the city of Salisbury that have elevated levels of nitrogen dioxide due to road traffic. Eight locations exceed the annual mean objective and have been declared “Air Quality Management Areas” (AQMAs) under terms of the Environment Act 1995.

Poor air quality impacts us all, directly, and indirectly. The annual mortality of human-made air pollution in the UK is roughly equivalent to between 28,000 and 36,000 deaths every year. It is estimated that between 2017 and 2025 the total cost to the NHS and social care system of air pollutants (fine particulate matter and nitrogen dioxide), for which there is more robust evidence for an association, will be around £15 billion. Improving air quality is not something Wiltshire Council can achieve on its own. Improving Air quality will need us all to contribute through changes in the way we do things.

Air quality has improved within Wiltshire’s AQMAs. For example, many streets in Salisbury that used to exceed the objective, no longer do so. The AQMA declared in 2001 in respect of fine particulates (PM10) in Bradford on Avon, has been revoked. Particulate levels are less than half the objective now however there is still work to be done.

This Action Plan has been developed in response to those exceedances of the annual mean objective, updating and replacing the previous Wiltshire Air quality Action Plan. It is one document of a suite of policies designed to improve air quality. These include:

- **The Air Quality Strategy for Wiltshire**, which seeks to reduce exposure to air pollutants across the county.

- **Wiltshire Core Strategy Core Policy 55 (and any subsequent local plan amendments),** which seeks to ensure that air quality is factored into development which has the potential to have an impact on air quality. This AQAP will be supported by a reviewed policy in the Local Plan review.

- **Supplementary Planning Guidance for Developers on Air Quality**, which seeks to mitigate the impact of new development on air quality across the county but particularly in the AQMAs.

The Environment Act 2021(EA21) has further strengthened the requirements of the EA95 and introduced more rigorous requirements for achieving improved Air Quality, which are welcomed. All councils must now consider air quality impacts in their decision making.

The evidence base with respect to the health impacts and economic costs associated with poor air quality has vastly increased since the EA95 was introduced, for example new standards have been introduced in relation to very fine particulates (PM2.5) which will benefit everyone's health.

When the last action plan was published, there was no formal format for its content and structure. DEFRA has now issued a template and formalised requirements in schedule 11 of the EA21. This Action Plan reflects those requirements. This together with our supporting policies, strengthened legislation and further changes proposed by DEFRA to support local authorities, has created a step change that will assist Local Authorities to improve air quality and protect all our health.

I am pleased to commend this Action Plan as a key step in continuing progress with improvements in air quality and protection of health.

Councillor Nick Holder.
Cabinet Member for Environment, Waste, Climate Change and Public Protection.

Executive Summary

This Air Quality Action Plan (AQAP) has been produced in fulfilment of Wiltshire Council's statutory duties as set out by the Local Air Quality Management Framework. It outlines the action we will take to improve air quality in Wiltshire between 2023 and 2026.

This Action Plan replaces the previous AQAP which ran from 2015 – 2020. Projects delivered directly & indirectly through the past Action Plan include:

- Ensuring Air Quality was incorporated into wider spatial planning & transport policy.
- Supporting the implementation of LTP (Local Transport Plan) 3 where it brings about improvements in Air Quality
- Implementing key junction improvements identified by the Devizes Transport strategy (including acceleration of A361/London Road junction improvements, and addition of new cycle towpaths improvements/ contraflow cycle lane)
- Establishment of local air quality groups to spearhead their own local initiatives to improve air quality within Air Quality Management Areas (AQMAs);
- Supporting bids to OLEV and for the introduction of electric buses in Salisbury.
- Developing revised Supplementary Planning Guidance on Air Quality for Developers.
- Developing a dedicated Air Quality website giving access to data to Wiltshire residents & others.
- Introducing a Know & Respond text service for vulnerable persons to alert them of poor Air Quality episodes.

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 inequalities, because areas with poor air quality are also often the less affluent areas (Ref. 1, Ref. 2)

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £15 billion. The public health impacts on residents who live

and work in areas of poor air quality are significant. It is estimated that there are 40,000 excess deaths each year (Ref. 3) attributed to serious respiratory and cardiovascular conditions, lung cancer, diabetes, and dementia (Ref. 4). The total costs of air pollution to society are estimated to be £25.3 billion (Ref. 5) - almost twice the cost of smoking.

Wiltshire Council is committed to reducing the exposure of people in Wiltshire to poor air quality in order to improve health.

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

- Alternatives to private vehicle use,
- Environmental permits,
- Freight and delivery management,
- Policy guidance and development control,
- Promoting low emission transport,
- Promoting low emission plant,
- Promoting travel alternatives,
- Public information,
- Transport planning and infrastructure,
- Traffic management and,
- Vehicle fleet efficiency.

Our priorities vary by AQMA, but are governed by these four overarching principles:

1) To secure the air quality objectives in the AQMAs,
2) To maintain good air quality across the rest of the county,
3) To lead by example through Wiltshire Council's own actions and,
4) To communicate and disseminate information to residents and other stakeholders.

In this AQAP we outline how we plan to effectively tackle air quality issues within our control, both at a strategic level across the county, and within each individual AQMA. Wiltshire Council recognises 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 Wiltshire Council's direct influence.

Responsibilities and Commitment

This AQAP was prepared by the Environmental Control & Protection Team, part of Public Protection Services, with the support of the following, departments and organisations:

Wiltshire Council,

- Public Protection Services
- Sustainable Transport Team
- Passenger Transport Team
- Spatial Planning Team
- Development Management
- Public Health Wiltshire
- Carbon Reduction Team
- Community Engagement Team

External organisations,

- National Highways (Highways England)
- AECOM Air Quality & Permitting.

The Draft AQAP was reviewed at Cabinet Liaison in December 2022. It has also been reviewed by the Senior Leadership Team & the Place Directorate Heads of Service, prior to a public consultation in July to September 2023.

The final AQAP was approved by cabinet / full council on 19 March 2024

This AQAP will be subject to an annual review. Progress each year will be reported in the Annual Status Reports (ASRs) produced by the Council and submitted to DEFRA, as part of our statutory Local Air Quality Management (LAQM) duties. The AQAP will be subject to an update after five years, should the requirement remain.

If you have any comments on this AQAP, please send them to Wiltshire Council at:

Public Protection Services, County Hall, Bythesea Road, Trowbridge. BA14 8JN

Tel: 01225 770556 Email: publicprotectionwest@wiltshire.gov.uk

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Introduction

This report outlines the actions that Wiltshire Council will deliver between 2024-2026 in order to reduce concentrations of, and exposure to nitrogen dioxide thereby positively impacting on the health and quality of life of residents and those visiting Wiltshire.

It has been developed in recognition of the legal requirement on the local authority to work towards National Air Quality Strategy (AQS) objectives under Part IV of the Environment Act 1995, as amended by the Environment Act 2021; to meet relevant regulations made under that Act, and to meet the requirements of the Local Air Quality Management (LAQM) statutory process.

The AQAP is structured such that the current air quality in Wiltshire is first outlined, in the context of each AQMA. The consequent priorities with regard to air quality are then presented, followed by a description of the measure development process, and then the measures themselves. Much of the technical supporting information is provided in appendices, including dispersion modelling inputs.

This Plan will be reviewed every five years and progress on measures set out within this Plan will be reported on annually within Wiltshire's ASR, which is submitted to DEFRA. It is recognised that continual improvements in air quality should also be made beyond the statutory objectives where possible, such as working towards the World Health Organisation's interim and final air quality guidelines (Ref. 6), which may move more to the forefront over the lifetime of this Plan. These form an aspirational aim of the AQAP as we seek to continually improve health outcomes, through this area of work.

Summary of Current Air Quality in Wiltshire

Our Annual Status Report (ASR) provides a detailed account of air quality within the county. This and earlier reports are all made available on our new Wiltshire Council webpages which are also designed to assist people and organisations to reduce their impact on air quality.

Air quality in Wiltshire is predominantly very good with the majority of the county having clean air compliant with the Air Quality Objectives (AQOs). There are a small number of locations where the combination of traffic volume, road layout and topography have resulted in pollutants being trapped allowing concentrations to increase to unacceptable levels. Nitrogen Dioxide (NO_2) and fine particulate matter (PM_{10}) are the two pollutants that are the primary cause for concern and the Environmental Control & Protection Team (EC&P) conduct both automatic and passive diffusion tube monitoring for these pollutants.

Where these pollutant concentrations are known to be in exceedance of an AQO, at locations of relevant exposure (i.e., places where people will be subject to exposure to a pollutant for a period of time), Air Quality Management Areas (AQMA) have been declared. There are 8 in total and are shown in **Error! Reference source not found.** : Wiltshire AQMAs

AQMA Name	Date of Declaration	Pollutants and Air Quality Objectives	City/Town
AQMA 1 Salisbury City Centre	23/11/2007	NO_2 Annual Mean	Salisbury
AQMA 2 Salisbury London Road	11/11/2007	NO_2 Annual Mean	Salisbury
AQMA 3 Salisbury Wilton Road (extended)*	03/03/2016*	NO_2 Annual Mean	Salisbury
AQMA 4 Bradford-on-Avon	26/11/2001**	NO_2 Annual Mean	Bradford-on-Avon
AQMA 5 Westbury	26/11/2001	NO_2 Annual Mean	Westbury
AQMA 6 Marlborough	12/05/2011	NO_2 Annual Mean	Marlborough
AQMA 7 Devizes	23/11/2007***	NO_2 Annual Mean	Devizes
AQMA 8 Calne	21/02/2013	NO_2 Annual Mean	Calne

* Wilton Road AQMA in Salisbury amended in March 2016 to cover a wider extent of roads including A36 trunk road between St Pauls roundabout Skew Bridge, and portion of Devizes Road.
** During April 2021 the Bradford-on-Avon AQMA was amended to remove Particular Matter PM_{10} as a pollutant of concern with continued compliance with the relevant National Air Quality Objectives.
*** AQMA amended in November 2009 to cover main roads within Devizes.

Current pollutant trends have been moving towards an overall improvement in air quality within Wiltshire. This AQAP is based primarily on concentrations as monitored

in 2019, prior to the impact of COVID-19, which is recognised had a potentially anomalous effect on pollutant concentrations in 2020 & to an extent in 2021. That said, concentrations in these years are discussed below to provide a better idea of the trends observed in recent years.

Despite the downward trend in NO_2 concentrations, exceedances of the NO_2 annual mean objective were reported in six of the eight AQMAs in 2019. Only Salisbury London Road and Devizes did not exhibit any monitored exceedances of the NO_2 annual mean AQO in 2019. There was one hourly mean concentration greater than 200 µg/m^3, but this did not represent an exceedance of the objective.

Average PM_{10} concentrations have remained consistent and were below the annual mean objective in 2019, hence the amendment of the Bradford on Avon AQMA Order to remove this pollutant from it. Across all of the PM_{10} monitoring locations, there were only five reported instances where the 24-hour mean was greater than the permitted threshold of 50 µg/m^3, which is well below the permitted 35 exceedances per site per annum. As such there were no exceedances of either PM_{10} AQO in Wiltshire in 2019.

In 2020, a further reduction of annual mean NO_2 concentrations was seen at all 72 of our monitoring sites, with only three sites exceeding the annual mean objective at the façade of relevant exposure locations, down from eight in 2019. No exceedances of the 1 hour mean objective were recorded, or considered likely, across the county.

The continuous monitoring across Wiltshire also confirmed that there were no exceedances of the PM_{10} AQOs (annual mean or 24-hour mean) in 2020. The annual mean concentrations were similar to those recorded in 2019, so did not exhibit such a significant drop off related to COVID-19 as was seen with nitrogen dioxide. 24-hour mean concentrations greater than 50 µg/m^3 were recorded at just one of the three sites, with the overall number well below the 35 exceedances permitted by the objective.

The following is a summary of each AQMA covered by this AQAP.

Salisbury AQMAs

Salisbury community area has a land area of 19km^2 with a population of 62,200 (2011 Census). The city is the third largest community area based on habitants after Chippenham and Trowbridge. Its proximity to the Stonehenge World Heritage site, the cathedral and other attractions make it a draw for international tourism and as a

consequence the combination of these notable features has led to increased road traffic in the area.

There are three AQMAs in Salisbury, declared in respect of the annual mean objective for nitrogen dioxide:

- Salisbury City
- London Road (A30) and
- Wilton Road (A36)

The first AQAP for Salisbury was based on the first Salisbury Transport Plan. The plan resulted in the development of five park & ride schemes, variable message signing and real time bus passenger information. Latterly schemes such as the removal of car parking from the Guild Hall & Market place have been implemented and three electric buses have been introduced that run on the Salisbury Park and Ride network.

A number of community air quality working groups were established under the terms of the AQAP for Wiltshire 2010-2015. The first Salisbury Community Action Plan was developed by the Salisbury Air Quality Steering Group and adopted by the Salisbury Area Board in 2015. The Action Plan is regularly kept under review & updated, being based on the promotion of cycling, walking and public transport initiatives. Much work has been focused on Salisbury post the Novachok incident to revitalise and enhance the city. This culminated in the development of the Central Area Framework which includes measures supportive of improving air quality, particularly on Fisherton Street and improving transport links at the railway station.

Previous Salisbury Transport Strategies highlighted the pressures of traffic along the following junctions: Park Wall Junction, St Marks Roundabout, College Roundabout, Exeter Street Roundabout and Harnham Gyrator. It is in these areas that traffic management measures have been designed to ease congestion.

Figure 2-1: Map of Salisbury City Centre AQMA

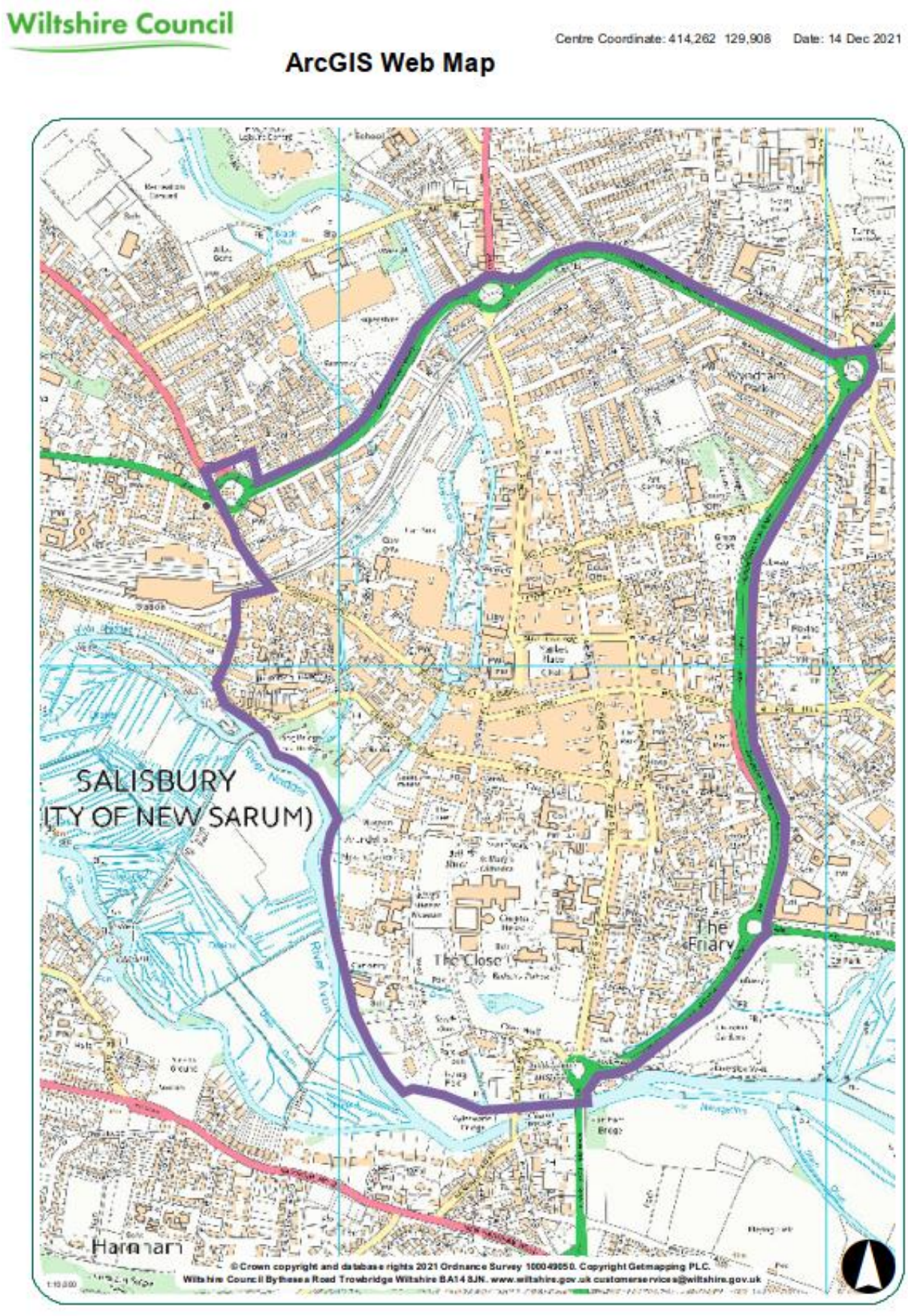


Figure 2-2: Map of Salisbury London Road AQMA

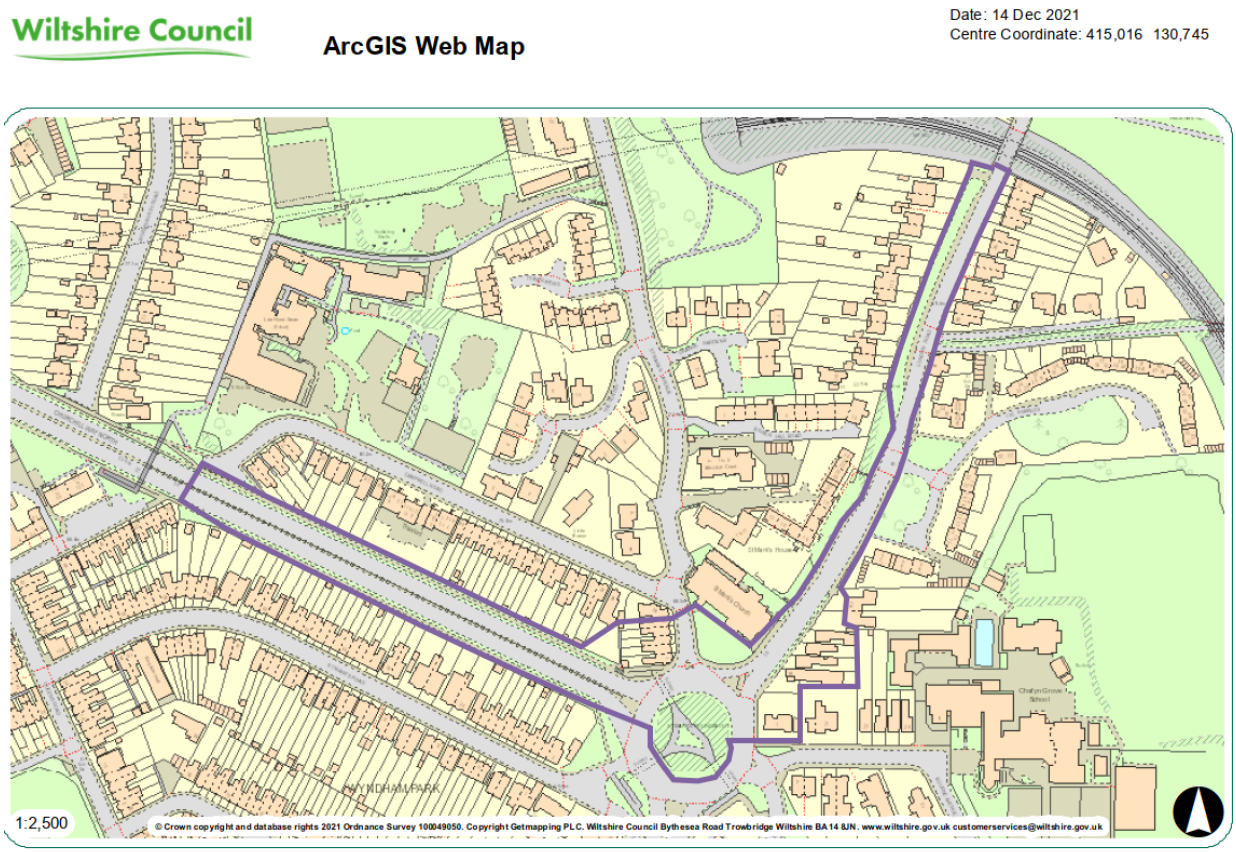
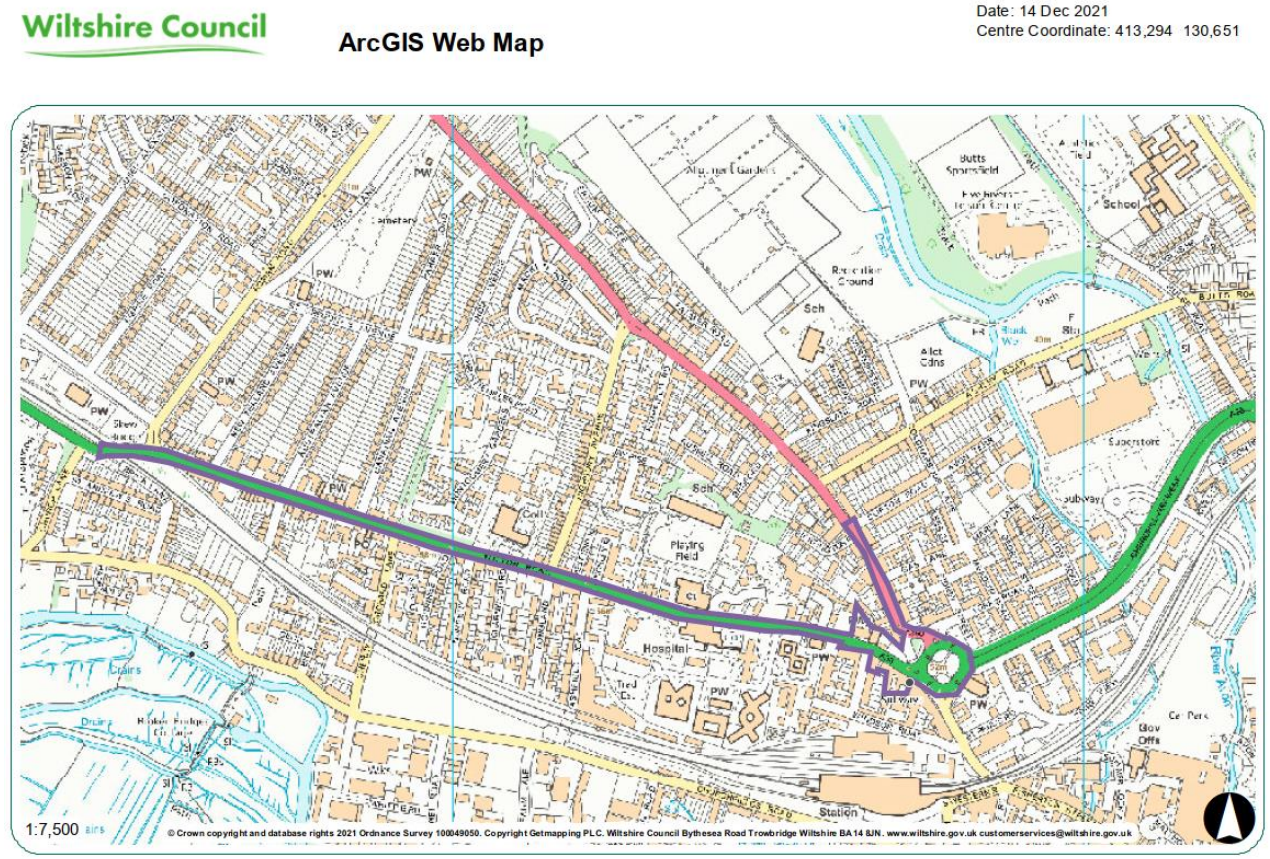


Figure 2-3: Map of Salisbury Wilton Road (A36) AQMA



Across the Wilton Road and London Road AQMAs, the concentrations of NO_2 recorded have dropped over the past few years with only a few locations along these A-roads remaining above the annual mean AQO. Nitrogen dioxide concentrations in Salisbury City have also shown some improvement across all monitoring locations, though some exceedances remain, particularly on Southwestern Road. Further measures are therefore considered to be required to bring concentrations below the AQO.

Bradford-on-Avon AQMA

The market town of Bradford-on-Avon is the main settlement in the area with a population of approximately 9400 in town; and 17,500 in the wider community area.

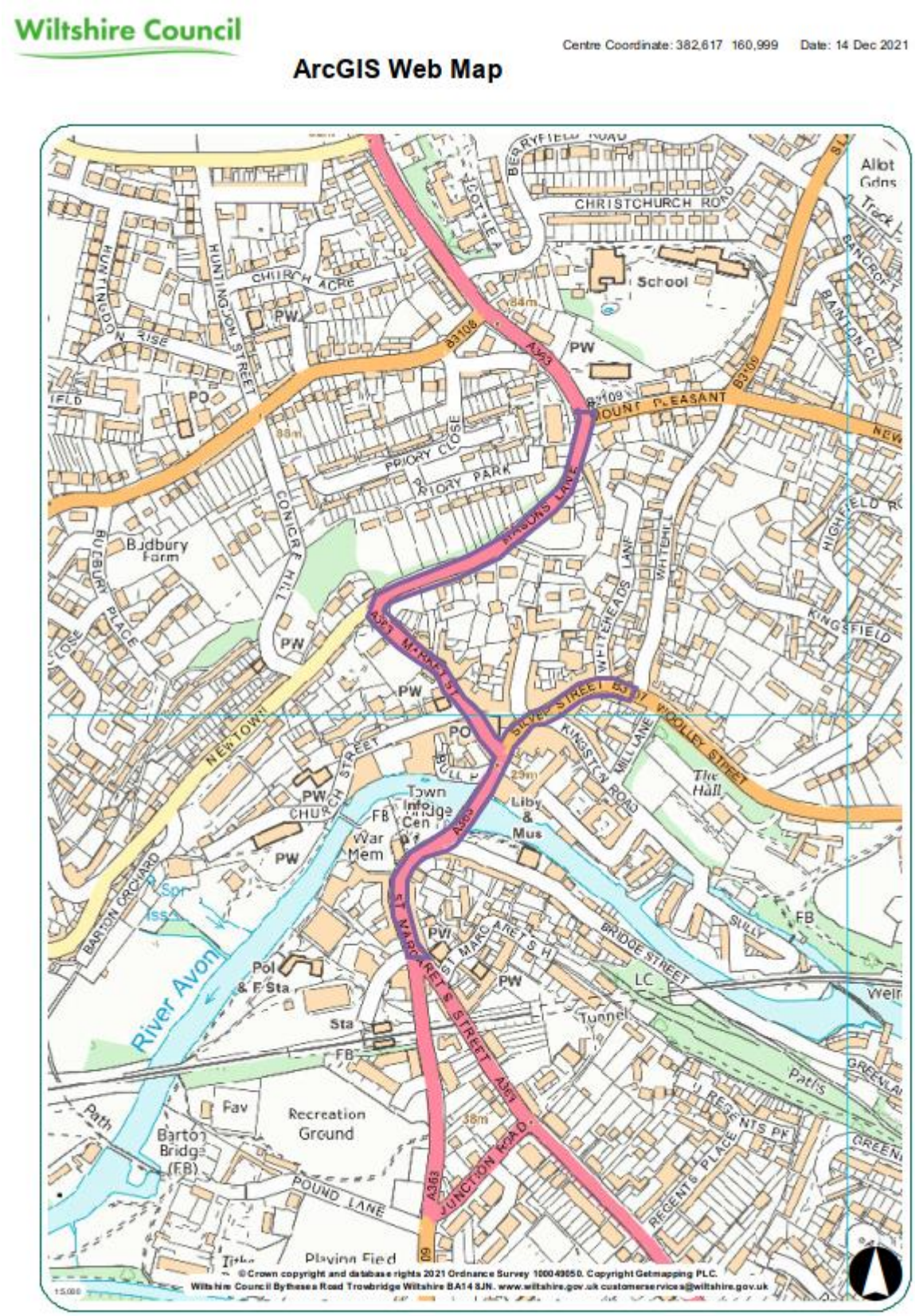
The town centre suffers from traffic congestion and poor air quality, a result of its topography, narrow streets, and single bridge across the river. In the summer, the area attracts many tourists especially day trippers from Bath which further adds to the area's traffic problems. The town has therefore been subject to a number of transport studies and air quality management plans.

The AQMA in Bradford-on-Avon was originally declared for exceedances of the annual mean objectives for nitrogen dioxide and fine particulates. The area covers the main roads in the centre of the town, as demonstrated in Figure 2-4. The AQMA Order was amended in April 2021 to remove PM_{10} as a pollutant of concern amid continued compliance with the AQOs for this pollutant. The annual mean concentration of nitrogen dioxide remains in exceedance on Masons Lane.

A Community Action Plan was produced in partnership with the Bradford-on-Avon Air Quality Alliance in 2015, with the goal of becoming a Clean Air Town by 2020, achieve the AQOs and establish the required structures and mechanisms to conduct actions that will achieve the aforementioned goals. A professional Origin and Destination Survey was undertaken, whose findings indicated a significant potential for local, community-based actions to address air quality issues within the AQMA.

Bradford on Avon's White Stripe group continued to work on improving air quality within the town and the Town Council has undertaken a public consultation to identify people's key priorities in terms of what needs to be achieved by any changes to the traffic network following removal of the temporary one-way system established during the early part of the COVID pandemic, which demonstrated improvements to air quality.

Figure 2-4: Map of Bradford-on-Avon AQMA



Westbury AQMA

Westbury is an important market town located between Trowbridge and Warminster with a population of approximately 18,000. The town has seen significant increase in housing & commercial developments in recent years the town suffers from traffic congestion and an AQMA was declared on the A350 through the town for exceedances of the nitrogen dioxide annual mean AQO, the extent of which is illustrated in Figure 2-5.

The A350 forms part of the Major Road network (MRN) and as such is an important transport link. Improvements to the road are being pursued from the north to south, with the latest proposals focusing on Melksham. Several improvements to the route have been made over recent years; currently Wiltshire Council is developing business cases for further improvements to the M4 junction 17, Chippenham Bypass and at Melksham.

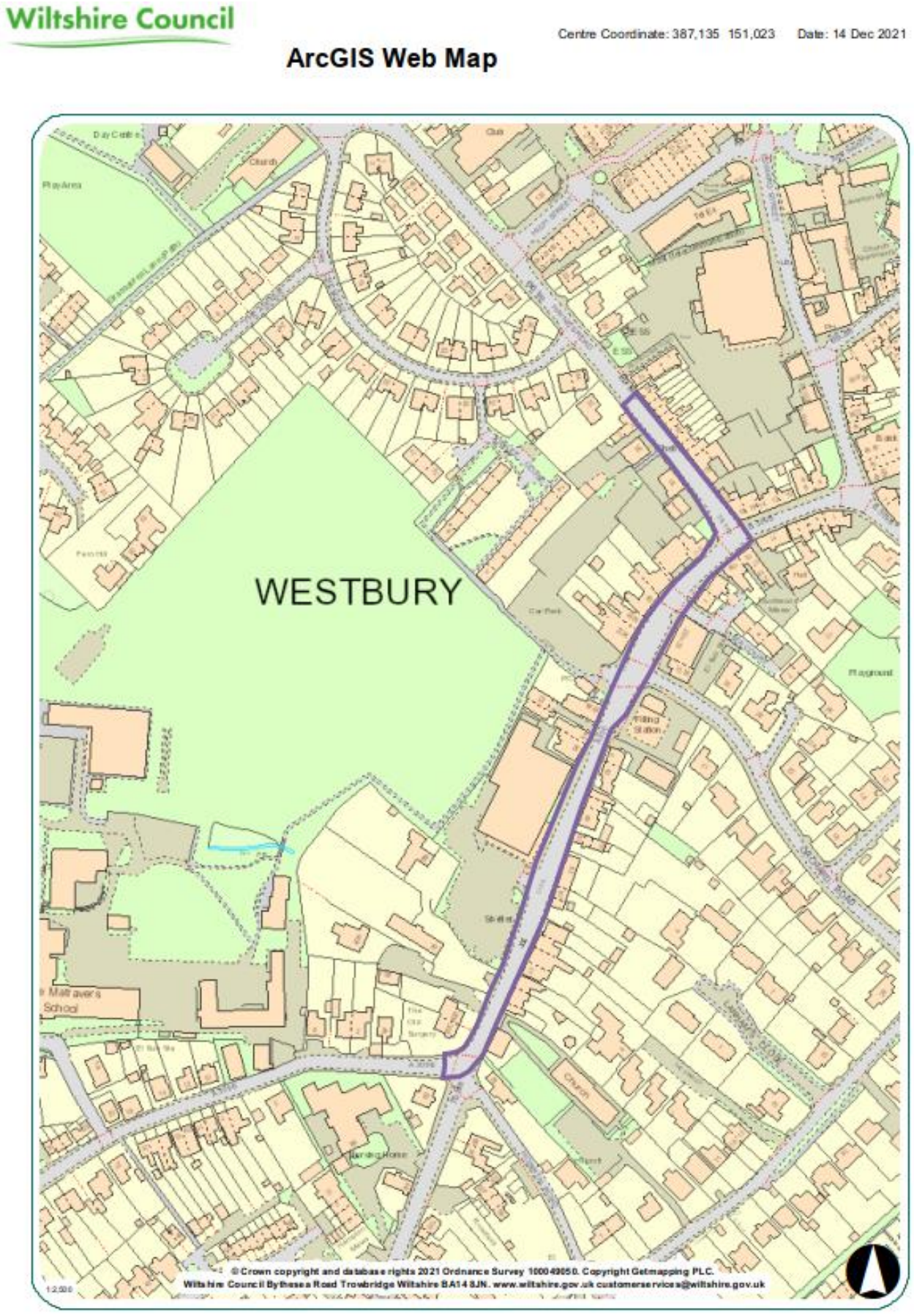
One area of concern is the impact of the Bath Clean Air Zone and the displacement of traffic from the zone onto Wiltshire roads, specifically the A350. This is being monitored closely by Wiltshire Highways & Transport.

The original AQAP focused on a proposed A350 bypass for the town. The cancellation of the bypass in 2009 forced a shift in action planning toward other measures such as promoting cycling and walking within Westbury. This is through the improvement of current cycle routes and footpaths as well as undertaking school travel planning to promote cycling for students. Wiltshire Council's Business Plan 2022- 2032 sets out an objective for vibrant, well-connected communities and includes an aim for,

"Major road programmes to reduce congestion and air pollution, and explore solutions to issues at J17 M4, Salisbury, Melksham and Westbury".

The annual mean concentrations of nitrogen dioxide are observed to show an overall decline over the previous five years, but exceedances remained in 2019.

Figure 2-5: Map of Westbury AQMA

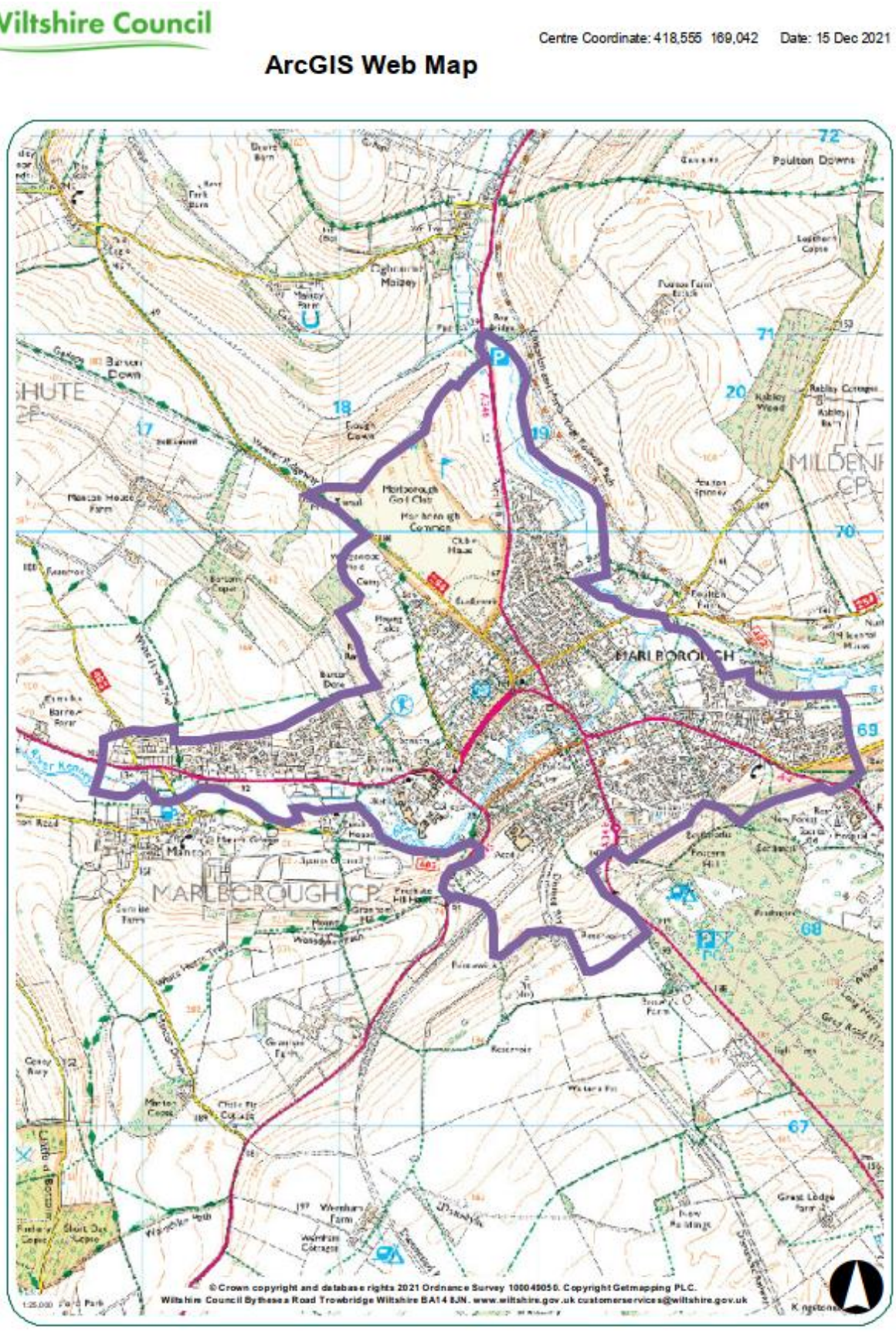


Marlborough AQMA

Marlborough is a small market town with roughly 17,920 habitants. It is connected to the M4 via the A346 which provides access for its residents to the neighbouring towns of Swindon and Newbury. The Marlborough Area Neighbourhood Plan includes local concerns about traffic levels on the A338/A346 through the town and a desire to see HGV traffic reduced. The lack of transport options has been highlighted as a contributor to residents tending to opt to use private vehicles. The AQMA in Marlborough was declared in 2011 for exceedances of the annual mean objective for nitrogen dioxide and covers the entire town as described by the town council boundary (with the exception of a small area to the southwest of the town), as shown in Figure 2-6. Exceedances of the objective are limited to the A346 through the town (Herd Street, in particular).

The annual mean nitrogen dioxide concentrations across the Marlborough AQMA have fluctuated around the AQO but have shown steady improvement over the last few years with lower concentrations. Some exceedances remain in the AQMA, and measures will target these areas to reduce pollution further.

Figure 2-6: Map of Marlborough AQMA



Devizes AQMA

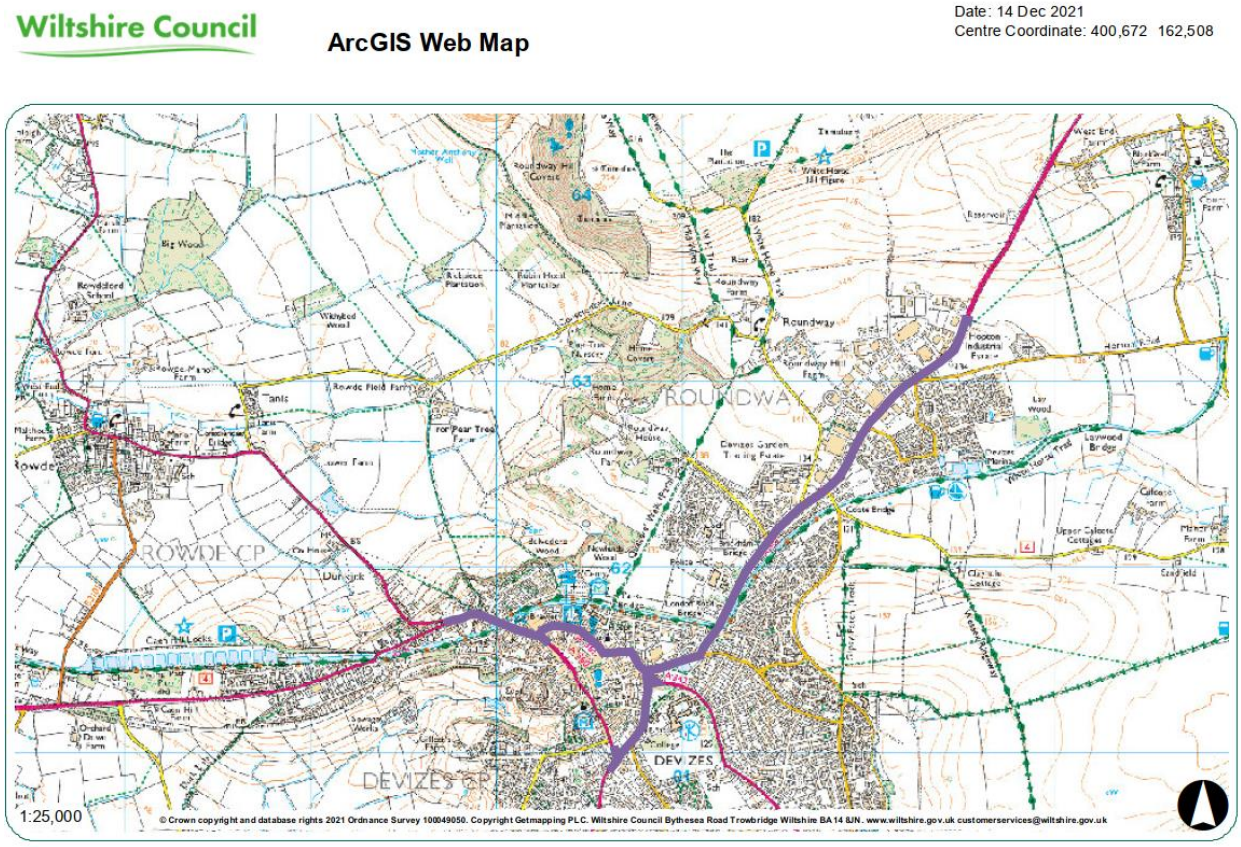
Devizes is a market town with approximately 30,730 habitants. A single AQMA was declared for exceedance of the nitrogen dioxide annual mean objective, in the latter part of 2009 covering a small area along Shanes Castle at the junction of the A342 and A361, and was subsequently amended in 2013, to encompass the main roads within Devizes town. The current extent of the AQMA is shown in figure 2.7 below.

Road traffic in Devizes is the predominant source of emissions causing the exceedances. The Devizes Transport Strategy 2012 detailed objectives of reducing transport related emissions, reducing the traffic congestion experienced in the town centre and residential areas, and promote sustainable transport.

The Community Action Plan for Devizes aimed to encourage a model shift, encourage fewer drivers in the town centre and use more sustainable form of transport. The measures in the former Action Plan looked to specifically encourage walking, cycling, use more sustainable transport; to review the parking arrangements; and manage traffic in congested areas. Key junctions were also looked to be modelled within the town that cause delays with the aim to improve the traffic flow at these points. Many of these measures are still relevant to help ease congestion in and around the AQMA.

The nitrogen dioxide concentrations measured along the main roads in the AQMA have seen slight drops below the annual mean objective in 2019. Although it is worth noting that the concentrations have fluctuated around the annual mean AQO for the past few years.

Figure 2-7: Map of Devizes AQMA



Calne AQMA

Calne has an estimated 24,325 habitants (2018). Due to the ease of access via the M4 to other neighbouring towns such as Swindon and Chippenham, people have tended to travel out to other areas for jobs. It is noted the market town has been identified as a potential area for significant development, which could lead to worsening air quality through increase road traffic and domestic combustion emissions.

The main source of pollution in Calne is the emissions generated by road transport. Appropriately the steps taken to meet the annual mean AQO for nitrogen dioxide will include reducing the emissions from these sources.

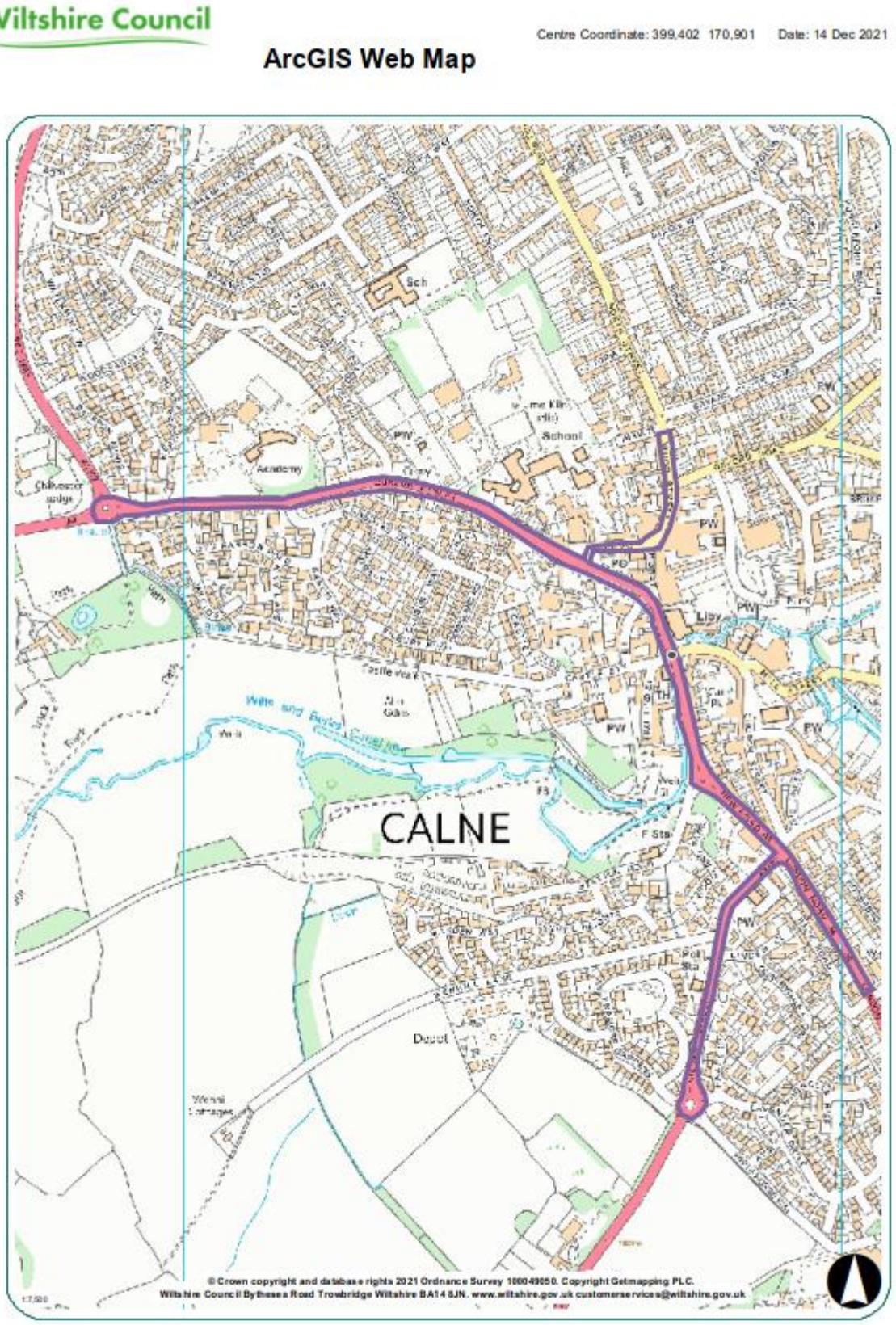
An AQMA was declared in Calne at the start of 2013 in respect of an exceedance of the nitrogen dioxide annual mean objective. The area covered by the AQMA centres on the A4 through Calne, and sections of two adjoining roads, as illustrated in Figure 2-8.

The local community plan for Calne was last produced in 2018 with the aim of encouraging the use of other forms of sustainable transport, modal shift and reducing the number of drivers within the local area. The notable actions put forward include the provision of a Heavy Goods Vehicles (HGV) spur road across land occupied by Hills Waste to re-route refuse related traffic away from the AQMA and encouraging the promotion of clean vehicles in the community. These measures and others are still considered to be relevant especially as they were only recently implemented.

More recently Wiltshire Council in conjunction with Calne Area Transport Group (CATG) have developed the Calne Transport Strategy. The purpose of the strategy is to outline the proposed approach to meeting specific transport objectives for Calne and Calne Without and identify a prioritised list of complimentary schemes and interventions that are shown to address known and well-evidenced issues.

Nitrogen dioxide concentrations in Calne have seen small fluctuations over the previous five years (2015 – 2019), with some monitoring locations exceeding the annual mean AQO. It is now therefore considered appropriate to identify further measures, and if necessary, re-visit previously suggested schemes, to secure compliance with the AQOs.

Figure 2-8: Map of Calne AQMA



Wiltshire Council's Air Quality Priorities

Public Health: Health Protection.

Estimates of mortality related to air pollution vary, but Defra's own estimates of the mortality burden of air pollution within the UK is equivalent to 28,000 to 36,000 deaths at typical ages (Ref. 3), Public Health England's Public Health Outcomes Framework (Ref. 7) identifies mortality attributable to air quality as an indicator for Public Health. This indicator addresses the fraction of mortality attributable to particulate air pollution ($PM_{2.5}$), a value for which is presented for each local authority. In Wiltshire, this fraction has been calculated at 4.2%, which lies below the national average of 5.1% in 2019.

Local air quality presents a significant concern for public health, and as such local authorities are now required to promote inter-departmental links to increase awareness of the effects of local air quality on public health, in addition to encouraging local action. All AQMAs are currently declared for exceedances of the annual mean nitrogen dioxide objective (40 µg/m^3).

Nitrogen dioxide emission reduction initiatives implemented to target road transport emissions may simultaneously aid in addressing emissions of $PM_{2.5}$. This may subsequently contribute to improving Wiltshire's mortality fraction attributable to particulate air pollution.

Planning and Policy.

The Air Quality Strategy for Wiltshire (Ref. 9) was published in 2019, superseding the former strategy from 2015 (Ref. 10), and provides four strategic priorities with regard to Air Quality in the county:

1) To secure the air quality objectives in the AQMAs,
2) To maintain good air quality across the rest of the county,
3) To lead by example through Wiltshire Council's own actions and,
4) To communicate and disseminate information to residents and other stakeholders.

These form the basis of the priorities for this AQAP and influence the measures that will be taken to improve air quality across Wiltshire.

The Wiltshire Core Strategy (Ref. 11), adopted in January 2015, included both a general policy regarding air quality and specific policies regarding housing growth and job creation across the county, all of which are applicable to this AQAP. Core Policy 55 provides the overarching information on air quality which will be taken into consideration within this AQAP.

Core policy 55

"Development proposals, which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity. Mitigation measures should demonstrate how they will make a positive contribution to the aims of the Air Quality Strategy for Wiltshire and where relevant, the Wiltshire Air Quality Action Plan. Mitigation may include:

i. landscaping, bunding or separation to increase distance from highways and junctions;

ii. possible traffic management or highway improvements to be agreed with the local authority;

iii. abatement technology and incorporating site layout/separation and other conditions in site planning;

iv. traffic routing, site management, site layout and phasing; and

v. where appropriate, contributions will be sought toward the mitigation of the impact a development may have on levels of air pollutants."

Core Policy 8 detailed progress on the plan period (2006 – 2026) to provide approximately 1,600 homes (with majority of these based directly in Calne town) and the provision of new employment land. By 2014, over half of these houses were provided and 6 hectares of employment land was committed to being provided.

Core Policy 12 within the strategy detailed progress on the plan to provide approximately 1,390 homes with majority of these based directly in Westbury town, 2500 homes with majority of these based directly in Devizes town and the provision of new employment land by 2026. By 2014, over half of these housing were provided, and approximately 18.5 hectares and 10 hectares of employment land was committed to being provided to Westbury and Devizes respectively. These are a consideration

included as part of the Action Plan to ensure they adhere to frameworks mentioned previously.

The Core Strategy was influenced by the third Local Transport Plan (LTP3) (Ref. 12), the strategic objectives of which include:

- SO2: to provide, Support and/or promote a choice of sustainable transport alternatives including walking, cycling, buses, and rail.
- SO3: To reduce the impact of traffic on people's quality of life and Wiltshire's built and natural environment.
- SO11: To reduce the level of air pollutant and climate change emissions from transport.
- SO13: to reduce the need to travel, particularly by private car.
- SO14: To promote travel modes that are beneficial to health.

Other relevant strategies that influence this AQAP include the Health and Wellbeing Strategy (Ref. 13), Energy Change and Opportunity Strategy (Ref. 14) and the Green & Blue Infrastructure Strategy for Wiltshire (Ref. 16). The Wiltshire Core Strategy is being reviewed and will be adopted within the lifetime of this AQAP (Quarter 4 of 2024). It is progressing towards the publication stage (Quarter 3 of 2023). Core Policy 55 and the Area Strategy Policies are being reviewed and updated where necessary. This AQAP will influence the development of these policies and for part of the evidence base for the LPR.

Source Apportionment

The AQAP measures presented in this report are intended to be targeted towards the predominant sources of emissions within Wiltshire AQMAs.

A source apportionment exercise was carried out by Wiltshire Council in 2021, based on both monitored nitrogen dioxide concentrations and road emissions nitrogen oxides (NOx). The key findings are as follows:

- Across all AQMAs, road contributions accounted for at least 74% of the nitrogen dioxide concentrations at the monitoring locations which returned the highest ambient concentrations, with the regional and local backgrounds making up the rest of the total. Regional and local background contributions tended to be a relatively even split.

- In all the AQMAs traffic was the main source of pollution;
- A large portion of NO_x emissions can be attributed to diesel cars (between 40-60% in all AQMAs);
- LGVs were found to be the next dominant source of NOx pollution after diesel cars in Marlborough, Westbury, and Devizes; and
- Generally, buses and HGVs were found to contribute around 10%-15% of NO_x emissions in each AQMA.

Required Reduction in Emissions

A summary of the maximum annual mean nitrogen dioxide concentrations at diffusion tube sites within the eight AQMAs (Ref. 8) is provided below in Table 3-1.

Table 3-1: Required NO_x reductions to achieve the AQO

AQMA	Maximum Modelled NO_2 Concentration in AQMA (µg/m^3)		Modelled Road NOx (µg/m^3)		Required Road NOx for 40 NO_2 (µg/m^3)		Required Road NOx reduction (µg/m^3) (% reduction required)	
	2019	2026	2019	2026	2019	2026	2019	2026
Salisbury City Centre	**47.3**	28.6	65.9	32.0	48.8	57.6	17.1 (26%)	-
Salisbury London Road	**42.4**	26.0	54.3	26.5	48.8	57.6	5.5 (10%)	-
Salisbury Wilton Road	**51.1**	30.9	75.1	37.0	48.80	57.58	26.3(35.0)	-
Bradford-on-Avon	**68.5**	**43.7**	135.8	76.0	61.1	66.8	74.7 (55%)	9.2 (12%)
Westbury	**48.1**	27.9	81.8	40.4	62.1	68.3	19.7 (24%)	-
Devizes	**56.7**	34.3	105.1	55.5	63.2	69.9	42.0 (39%)	-
Calne	**53.2**	32.5	95.7	51.0	63.2	68.8	32.6 (34%)	-

NO_2 concentrations shown in bold indicate exceedances of the AQS objective for annual mean NO_2 set at 40 µg/m^3, and underlined figures indicate potential exceedances of the short-term (1-hour) NO_2 objective.
*Data Modelling for Marlborough is not being taken forward as it did not correlate with real world readings.

Emissions from combustion sources consist of some nitrogen dioxide but mainly nitric oxide. This reacts rapidly in the atmosphere to form nitrogen dioxide. The two gases existing in equilibrium and so calculations take this into account, hence references to both.

The data for 2019 shows that the annual mean nitrogen dioxide concentration at various locations in the AQMAs are above the 40 µg/m^3 AQO. Details on the required NOx emission reductions to achieve the annual mean AQO of 40 µg/m^3 is given in Table 3-1.

The required reduction in NO_x emissions has been calculated in line with Technical Guidance LAQM.TG(16) (Ref. 17) Chapter 7 (Box 7.6) using Defra's NO_x to NO_2 calculator as outlined in Appendix D: Reduction in road NOx Emission Calculation.
As outlined in Table 3-2, all AQMAs are predicted to be below the annual mean objective value of 40 µg/m^3 by 2026 with the exception of Bradford-on-Avon, in the absence of any additional measures to combat air quality issues. This is based on an interpolation of the trend in modelled concentrations between 2019 and 2026.

Table 3-2: Estimated year of compliance without any interventions

AQMA	Estimated Year of Compliance without measures (Based on Modelling)
Bradford-on-Avon	2028
Calne	2024
Devizes	2024
Marlborough	2024
Westbury	2022
Salisbury London Road	2020
Salisbury Wilton Road	2023
Salisbury City Centre	2022

Modelling is not an exact science, and it is envisaged that measures will be required to ensure the improvement of air quality is accelerated and maintained below AQO. It should also be noted that the estimated year of compliance is based upon national fleet assumptions used in the Emissions Factor Toolkit (EFT, Ref. 19), which may not be completely reflective of each area where the vehicle fleet composition may be different. Given the disruptive nature of COVID-19, it is also likely that the national fleet projections that are inherent to these forecast improvements may change in a different way to that which was predicted pre-pandemic.

Although these dates indicate when at level of 40ug/m^3 or below will be achieved in order to revoke an AQMA order DEFRA have stated that either of the following criteria must be achieved:

- 3 years of emissions at or below 10% of the AQO (i.e., 36ug/m^3 with respect to the annual mean object for nitrogen dioxide) or,
- 5 years below the AQO (i.e., 40ug/m^3 with respect to the annual mean objective for nitrogen dioxide).

Key Priorities

As already stated, the Council's key priorities, as aligned with the Air Quality Strategy, are as follows. Each measure is designed to enhance one or more of these strategic priorities.

1) To secure the air quality objectives in the AQMAs,
2) To maintain good air quality across the rest of the county,
3) To lead by example through Wiltshire Council's own actions and,
4) To communicate and disseminate information to residents and other stakeholders.

Development and Implementation

Consultation and Stakeholder Engagement

In developing/updating this AQAP, we have worked with other local authorities, agencies, businesses, and the local community to improve local air quality in the development of the measures presented. The AQAP measures have been developed in consultation with our partners for each AQMA, namely:

Wiltshire Council

- Public Protection Services
- Passenger Transport Team
- Sustainable Transport Team
- Spatial Planning Team
- Development Management Team
- Public Health Wiltshire
- Carbon Reduction Team
- Community Engagement Managers
- Economy & Regeneration Team

External organisations

- National Highways (Highways England)
- AECOM Air Quality & Permitting.

Once put forward as potentially viable by the stakeholders, each measure was also considered in detail in partnership with our independent consultants, AECOM, for its applicability to dispersion modelling of the impact of the intervention. Some measures, such as direct traffic interventions, lend themselves readily to quantification. measures, such as behavioural change, are far more difficult to quantify. Where possible, measures have been modelled for their potential impact. These scenarios are generally set up to be aspirational, i.e., the maximum improvements a particular measure can reasonably achieve in isolation, and the practicalities of implementation may mean impacts differ in reality. This approach does give the Council a target to work towards.

Amendments to the Environment Act 2021 enhance the role of 'Air Quality Partners' in action planning by placing a statutory duty on their co-operation, and we will engage with relevant parties in this context, as appropriate, through the cycle of this AQAP.

Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed, which will be undertaken at the draft stage of the AQAP.

The response to our consultation stakeholder engagement is given in Appendix A: Response to Consultation'. Table 4-1 outlines the scope of consultation.

Table 4-1: Consultation Undertaken

Yes/No	Consultee
Yes	The Secretary of State (Defra)
Yes	The Environment Agency
Yes	The highways authority
Yes	All neighbouring local authorities
Yes	Other public authorities as appropriate, such as Public Health
Yes	Bodies representing local business interests and other organisations as appropriate
Yes	Local parish and Wiltshire Council councillors
Yes	Local air quality groups
Yes	Members of the public

Steering Group

Consultation with our key partners and stakeholders began in March 2020. The following partners attended an initial meeting on 19th March 2020:

Wiltshire Council

- Public Protection Services,
- Sustainable Transport Team,
- Passenger Transport Team,
- Spatial Planning Team,
- Development Management,
- Public Health Wiltshire,
- Community Engagement Managers for areas with AQMAs,
- Economy & Regeneration Service,
- Carbon Reduction.

External organisations

- National Highways

* The Economy & Regeneration Service was not consulted until May 2021 and therefore did not attend this initial meeting

The initial meeting covered the following topics:

- The legal basis for air quality management,
- Air quality challenges in Wiltshire,
- The role of Air Quality Strategy adopted in 2019 in setting the direction for improving air quality and the rationale for a new action plan,
- Basic source apportionment and require reductions within AQMAs and,
- Areas of common ground & opportunities for interdepartmental working.

Further meetings were held with each individual partner over the following 6 months to identify existing areas of policy alignment/compatibility along with the potential challenges and opportunities for further joint working.

Air quality consultants AECOM were engaged in December 2020 to assist us with the collection of baseline traffic data and source apportionment along with a “long list” of air quality measures to be used as a starting point for discussions with key partners within the Council’s Transport and Spatial Planning teams. Further consultation with colleagues occurred in May, June and July 2021 to identify potential measures from within the ‘long list’ that could be incorporated into a ‘shortlist’ of measures.

Detailed dispersion modelling of the shortlist was carried out by AECOM in November 2021 and an initial draft action plan completed in January 2022. This was broadly accepted by the Environmental Control & Protection Team, who then undertook further development & consultation with internal stakeholders, and sought the views of both the portfolio holder for Public Health & Public Protection, Leisure, Libraries, Facilities Management & Operational Assets and Wiltshire Council’s Cabinet before advancing to public consultation.

Internal consultation

The development of the Action Plan has been led by a small group of officers within the Environmental Control & Protection Team. They have worked closely with air quality partners as detailed above to avoid the need for large, inefficient gatherings. Due to COVID most gatherings were conducted over MS Teams.

In late 2021 the council directorates underwent a restructure and Public Protection Services moved from the Communities & Neighbourhoods Directorate to a new Environment Directorate. A key activity of new Environment directorate is to develop mechanisms to engage the community and stakeholders with the council’s environmental agenda, including the establishment of a new Climate and Environment Forum that will support partnership working, share information and capture successes.

In late 2022 the plan was presented to the Place Directorate Heads of Service, the Senior Leadership Team and Cabinet Liaison for final comments before public consultation.

AQAP Measures

Table 5-11 shows the Action Plan measures and comprises:

- 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 and,
- how progress will be monitored.

The table is split into strategic policy measures that will help to set the agenda for general air quality improvements across Wiltshire. Each AQMA is then afforded localised, specific modelled measures that have been quantitatively assessed for the potential impact on nitrogen dioxide concentrations. In many cases, the specific measures are not expected to achieve compliance with the objectives in isolation, so it is the Council's intention that a combination of the strategic and specific measures will work towards compliance with the AQO sooner than would otherwise have been achieved naturally. It is acknowledged that progress towards the implementation of these strategic and specific modelled measures will require significant time and resource from within the Environmental Control & Protection Team. A business case will therefore be made for funding towards a dedicated Air Quality Action Plan Implementation Officer whose role will be to work with our key air quality partners to help us drive forward the measures set out in this action plan.

In addition, both strategic and specific modelled measures provide the basis for valuing air quality impacts within AQMAs in order to offset any additional 'residual' pollutant contribution from new development. Further details can be found in the council's Air Quality Strategic Planning Document (SPD).

Each measure is summarised in the following section, which includes a simple cost benefit analysis based on the metrics outlined in Table 5-1. As many of the measures are conceptual at this stage, these are largely qualitative comparisons, but should aid the interpretation of the relative efficacy of each measure.

This comparison also recognises that whilst measures may have varying impacts on air quality, that is not always the only consideration for their implementation. None of the metrics are given a stronger weighting as a result. The metrics within the analysis can be described as follows:

- Air Quality Benefit (AQ) – the maximum direct benefit on NO_2 concentrations (i.e. in 2019). This will be based on modelled data where possible, and experience of similar measures,
- External Benefits (Ex) – the perceived externalities associated with the measure, i.e. the knock-on impacts on two other key priorities, climate change and transportation,
- Alignment with existing policies (Po) – reflects the measure's alignment with existing policies, at both a local and national level and,
- Expected Cost (£) – anticipated financial implications of measure, the direct cost of implementation.

Table 5-1: Measure Cost Benefit Analysis (CBA)

Level	Air Quality Benefit (AQ)	External Benefits (Ex)	Alignment with existing policies (Po)	Expected Cost (£)
0	No discernible or direct benefit, even a disbenefit, to NO_2	No discernible benefits to other priority areas, climate and transport policy	Diverges completely from existing Council and National policy	Zero cost, or part of existing spend
1	Low (<1 µg/m^3) benefit to NO_2	Low benefits to climate and transport	Low alignment with existing policy	Low (<£10,000) cost
2	Medium (1-5 µg/m^3) benefit to NO_2	Medium benefits to climate and transport	Medium alignment with existing policy	Medium (£10,000-£100,000) cost
3	High (>5 µg/m^3) benefit to NO_2	High benefits to climate and transport	High alignment with existing policy	High (£100,000 – £1000,000) cost
Example Calculation: Measure Z: AQ (2) x Ex (2) x Po (3) - £ (1) = Overall Rating (11) CBA Rating Banding: -3–0 = Undesirable Measure 0–5 = Low Priority Measure 5–10 = Medium Priority Measure 10+ = High Priority Measure				

Alongside the calculation within the descriptions of the measures, the CBA rating of each measure is provided in brackets within each green box summarising the measures for each area, and in Table 5-11.

Updates on implementation of these measures will be reported in the Annual Status Report prepared for DEFRA and published in June each year.

Strategic Polices

The more strategic level policies, i.e., those that are applied across multiple / all AQMAs, and generally across the county, are summarised as follows. Each measure is assigned an ID number and the CBA rating in brackets. Air Quality cannot be considered in isolation and so have drawn links with policies and strategies from across the authority:

S1 Electric Vehicle Charging Infrastructure Strategy (15)

S2 Local Transport Plans (15)

S3 Local Walking & Cycling Infrastructure Plans (16)

S4 Bus Service Improvement Plan (15)

S5 Car Clubs & E-Bike Schemes

S6 Taxi Low Emission Licensing (10)

S7 Low Traffic Neighbourhoods (LTNs) (10)

S8 Promoting Active Travel (8)

S9 Fleet Recognition Schemes (8)

S10 Limit Road Work Hours to Outside of Peak Periods (3)

S11 Area Boards with AQMAs (3)

S12 Delivering Air Quality Improvements through the Planning System (18)

S13 The Green & Blue Infrastructure Strategy (8)

S14 The Wiltshire Climate Strategy (8)

S15 Air Quality Website (2)

S16 Climate Change & Environment Forum (6)

S17 Support Air quality Events Such as Clean Air Day (3)

S18 Promotion & Support of no Idling Schemes (8)

S19 UK100

S20 Combustion Control and Regulation (8)

S1 Electric Vehicle Charging Infrastructure Strategy

Wiltshire Council's Cabinet agreed in October 2021 to approve a new electric vehicle charging infrastructure plan (Ref. 20), a decision that will help to reduce both nitrogen dioxide and carbon emissions in the county and improve facilities for EV drivers by both upgrading what is already in place and increasing the number of available chargers. The plan covers all elements of the charging infrastructure, including destination and residential charging, offering charging hubs at Wiltshire Council and private sites, charging for public transport and private hire vehicles, and renewable energy generation to satisfy increasing power demand. Up to £275,000 capital investment has been allocated via the Strategy.

It is envisaged that the strategy, whilst primarily focused on climate change as the key driver, will also have complimentary effects on Wiltshire's AQMAs. This strategy will be replaced by a longer term and more comprehensive strategy that will form part and this will address the DfT recently published EV Infrastructure Strategy

S1 CBA: AQ (2) x Ex (3) x Po (3) - £ (3) = Overall Rating (15)

S2 Local Transport Plans

The Local Transport Plan 3 covers the period April 2011 to March 2026 and forms a key strategic policy document in delivering improved air quality as the cause of excess levels of nitrogen dioxide is transport. LTP4 is under development and will supersede the current plan.

The current plan is accompanied by a suite of strategies including those on:

- Public Transport
- Smarter Choices
- Car Parking Strategy

Error! Reference source not found. ***CBA: AQ (2) x Ex (3) x Po (3) - £ (3) = Overall Rating (15)***

S3 Local Cycling & Walking Infrastructure Plans (LCWIPs)

These form an important part of the LTP. At the time of writing these Plans are being developed for the principal settlements and market towns as well as the key routes between them.

The government's Strategy for Active Travel, Gear Change, published in 2020, sets out an overarching objective "*to see a future where half of all journeys in towns and cities are cycled or walked".*

The draft Framework Wiltshire Local Cycling and Walking Infrastructure Plan (LCWIP) and the draft Salisbury LCWIP were published for consultation in summer 2022. LCWIPS for Chippenham, Trowbridge and Devizes will be published in 2023, and LCWIPs for the remaining market towns will be published in subsequent years.

S3 CBA: AQ (2) x Ex (3) x Po (3) - £ (2) = Overall Rating (16)

S4 Bus Service Improvement Plan (BSIP)

As part of the national Bus Strategy for England all Councils are required to produce a bus service improvement plan (BSIP) that outlines its vision for services in their area. These aim to:

- Support the local economy - Improved access to shops and areas of employment to help build back and improve the economy post covid
- Improve services to support vulnerable and elderly residents to access essential services such as shopping and medical appointments
- Reduce carbon output and improvement in air quality by reducing the number of car journeys across Wiltshire
- Support leisure travel and local tourism - Through improved weekend, rail link services and more extended bus services.

Wiltshire Council's BSIP seeks to prioritise services at locations which operate through and AQMA in recognition of the need to mitigate poor air quality. As such, the authority will ensure our work to bring zero-emission buses to the county will prioritise routes operating in these areas to maximise the benefits of reduced emissions and improved air quality.

Linking active travel and public transport significantly extends the length of active travel journey and extends the coverage which public transport provides. It is important therefore to consider how best different methods of travel, particular public transport and its connectivity with other public & active modes can be combined to maximise benefit for users and air quality outcomes.

S4 CBA: AQ (2) x Ex (3) x Po (3) - £ (3) = Overall Rating (15)

S5 Car clubs and E-Bike schemes

Salisbury currently has a car Club Scheme and Wiltshire Council is supportive of expansion of such schemes in order to reduce the need for private vehicle ownership within urban areas. We are also supportive of E-bike hire schemes particularly where they involve the ability to hire cargo bikes. Wiltshire council will investigate how we can best support and encourage development and expansion of these schemes. This may include seeking central government finance to achieve this and/ or developer contributions

S5 CBA: AQ (2) x Ex (2) x Po (3) - £ (2) = Overall Rating (10)

S6 Taxi Low Emission Licensing

The current condition states that: *"on first application for a licence, only vehicles under five years old from the date of first registration will be considered".*

There is currently little further provision for vehicle age or emissions rating within the Council's taxi and private hire vehicle licensing requirements (with the exception of wheelchair accessible vehicles, which are required to be a certain age). This policy will be revisited, though the exact parameters will be subject to councillor scrutiny. Initial meetings were undertaken with the prior to COVID -19 with the then Head of Service. These discussions will be reinitiated with the new management. Aspirationally, all licensed vehicles would be zero emissions capable if the market permits.

S6 CBA: AQ (2) x Ex (2) x Po (3) - £ (2) = Overall Rating (10)

S7 Low Traffic Neighbourhoods (LTNs)

Low Traffic Neighbourhoods' (LTNs) are area-based interventions that use 'modal filters' (planters, bollards, or camera gates) to remove through motor traffic from residential streets, and so lend themselves readily as AQMA policy interventions. These have achieved some successful implementations in London especially during the COVID-19 pandemic. Benefits will be highly localised, and associated with distributional impacts, so detailed investigations will need to be undertaken prior to any implementation.

S7 CBA: AQ (2) x Ex (3) x Po (2) - £ (2) = Overall Rating (10)

S8 Promoting Active Travel

Various programmes exist across the county that encourage active travel, all of which should have a net benefit on air quality by removing journeys that would otherwise have been undertaken in nitrogen dioxide emitting vehicles. These will be built on through the life of the AQAP.

Some of these initiatives include the Public Health funded project 'Get Wiltshire Walking' (Ref. 21) walks, which offers free, guided weekly routes to anyone who would like to join, returned from 4th May 2021. Cycling is also a focus, and the 'Connecting Wiltshire: Cycling' (Ref. 22) provides information on how to get into cycling in Wiltshire, including popular routes, cycle hire, and much more. This measure is also linked to the Wiltshire Smarter Choices strategy (Ref. 23).

Integration with other measures is highly relevant and important here in order to extend active travel journeys through integration with other modes such as bus and rail.

Further information related to active travel can be found on the Council's Connecting Wiltshire website.

S8 CBA: AQ (1) x Ex (3) x Po (3) - £ (1) = Overall Rating (8)

S9 Fleet Recognition Schemes

Various fleet recognition schemes exist, which aim to encourage more efficient and cleaner operations for HGVs, buses, coaches, vans and taxis. One of the most well-known of these is the ECO Stars Fleet Recognition Scheme (Ref. 24). We intend to investigate the viability of bringing this, or other such schemes, to Wiltshire based businesses, particularly those that operate a high number of LGVs, given this is the predominant source of vehicular emissions (outside of diesel cars) in a majority of the AQMAs.

S9 CBA: AQ (1) x Ex (3) x Po (3) - £ (1) = Overall Rating (8)

S10 Limit Road Work Hours to Outside of Peak Periods

As all road users will know, whilst vital to maintaining the network, road works can cause congestion that leads to idling emissions that exacerbate air quality issues. Whilst it is not feasible that these should not occur, it is intended to further investigate optimising scheduling, so that within AQMAs, road works are not active within peak periods of travel demand.

S10 CBA: AQ (2) x Ex (3) x Po (1) - £ (3) = Overall Rating (3)

S11 Area Boards with AQMAs

The Council has established a number of local air quality groups to spearhead local initiatives to improve air quality where AQMAs have been declared. These groups report directly to their Area Boards. The groups are composed of local councillors, interest groups and private individuals and they draw upon expertise of other services and experts as they deem necessary. They are tasked with reporting to their Area Board annually. These have been implanted through the last AQAP cycle and will be continued.

S11 CBA: AQ (1) x Ex (1) x Po (3) - £ (1) = Overall Rating (3)

S12 Delivering Air Quality Improvements through the Planning System

Developers have the power to make or break the AQAP. The 2012 Supplementary Planning Document (SPD), remains in draft form and has been largely superseded. Consequently, an updated SPD is urgently required, one which provides clarity to developers regarding what we expect from them in terms of air quality.

A new SPD has been developed alongside this action plan for consultation and adoption by the council. The new SPD compliments core policy 55 of the Core Strategy, establishing a risk rating procedure for proposed sites on the basis of their impact on air quality and requires good design along with measures to mitigate/offset impacts of proposals. Provision is made to request financial contributions to assist in the delivery of measures contained within this action plan.

It is important to note that the Core Strategy is being reviewed. The new Local Plan Review will be adopted in the lifetime of this AQAP and hence will become a policy consideration. Core Policy 55 will be updated where necessary to reflect national planning policy and guidance. However, it is clear that the policies in the Local Plan Review will continue to support the objectives of this and all future AQAPs, as well as the proposed SPD, once adopted.

S12: CBA: AQ (2) x Ex (3) x Po (3) - £ (0) = Overall Rating (18)

S13 The Green & Blue Infrastructure Strategy

The Wiltshire Green Blue Infrastructure (Ref. 16) Strategy focuses on the natural environment and how by creating a strong, well-considered network of green and blue corridors and spaces we can support adaption and resilience to climate change, halt loss of and improve biodiversity and contribute to the health and wellbeing of our communities. This will have a complimentary effect on air quality, both through localised mitigation, and a regional reduction in overall emissions.

Tree planting and other nature-based solutions have a role in contributing to both a greater sense of wellbeing, as well as making a contribution to improved air quality, if

planned so as not to inhibit dispersion. The council has a funded programme for tree planting within communities.

S13 CBA: AQ (1) x Ex (3) x Po (3) - £ (1) = Overall Rating (8)

S14 The Wiltshire Climate Strategy

Wiltshire Council has declared a climate emergency and aims to be carbon neutral by 2030. Climate and air quality policies often overlap, so joint consideration will be essential to our success in both areas. The Wiltshire Climate Strategy (Ref. 26) enhances focus on both carbon and nitrogen dioxide emissions. Over 1,000 people and organisations commented on the strategy, which covers seven delivery themes; transport, built environment, waste, green economy, energy generation, storage, and distribution, natural environment, food and farming, and a carbon neutral council.

S14 CBA: AQ (2) x Ex (3) x Po (3) - £ (0) = Overall Rating (18)

S15 Air Quality Website

The Council will make its data, reports, guidance, and general information available via a website for use by consultants and the community for the formulation of action plans, community sponsored initiatives and wider mitigation. New webpages have been developed on the Wiltshire Council domain providing advice and sign posting for those wishing to take active steps toward reducing their impact on air quality. These will be further developed over the life time of this plan.

S15 CBA: AQ (1) x Ex (3) x Po (3) - £ (1) = Overall Rating (8)

S16 Climate and Environment Forum

Wiltshire Council's Environment Directorate has recently established a Climate & Environment forum. It is a non-statutory body, whose recommendations are not binding but provides a citizens panel the opportunity to discuss and shape climate change and environmental policy.

S16 CBA: AQ (1) x Ex (2) x Po (3) - £ (0) = Overall Rating (6)

S17 Support Air quality Events Such as Clean Air Day

We will look to support events related to air quality promotion in the county,

Council led events will be well publicised on our website. Organisers of private events should contact the Public Protection team, to discuss whether support can be provided.

The ultimate aim of such events is to promote awareness and engagement with air quality as an issue and encourage behaviours that lead to an overall reduction in nitrogen dioxide emissions as a result.

S17 CBA: AQ (1) x Ex (2) x Po (3) - £ (0) = Overall Rating (6)

S18 Promotion & Support of 'No Idling' Schemes

Generally, requests for advice on these come from those living in the vicinity of schools & schools themselves. They are relevant particularly in areas of high traffic congestion, taxi ranks and streets with multiple bus stops in close proximity eg Endless Street and Blue Boar Row in Salisbury. We will work with interested parties to promote voluntary schemes to encourage drivers to switch off engines when stationary and use auto/ stop start when queuing in congestion.

S18 CBA: AQ (1) x Ex (3) x Po (3) - £ (1) = Overall Rating (8)

S19 The UK100

The UK 100 is a network of highly ambitious local government leaders which seeks to devise and implement plans for the transition to cleaner energy that are ambitious, cost effective and take the public and business with them.
The Council will continue to support and play an active role in the UK100
A recent report from the UK100 introduced the concept of 'Clean Air Net Zero'

S19 CBA: AQ (1) x Ex (3) x Po (3) - £ (0) = Overall Rating (9)

S20 Combustion Control and Regulation

This AQAP is primarily focused on transport emissions as these are the primary local source of nitrogen dioxide exceedances but point sources such as industrial chimneys, vents and flues must not be ignored. There is an opportunity to provide strong governance of combustion sources (typically more related to PM_{10} and $PM_{2.5}$ emissions) both within and outside the AQMAs which impact overall air quality in them. Emerging from the government's 2019 Clean Air Strategy, was a clear focus on wood burning stoves, as burning wood and coal in open fires and stoves makes up 38% of the UK's primary emissions of $PM_{2.5}$.

In anticipation of more stringent objectives relating to fine particulates in the coming years, we intend to be proactive, whilst having regard to issues of social exclusion & rural poverty. The implementation of the Eco-design 2022 regulations for small wood burning stoves, will be important over the lifetime of this AQAP, although it is recognised that this will likely need to be focused on urban centres, where on-grid power solutions are available.

Industrial and commercial sources should be addressed jointly by both Climate Change and Air Quality policies. Biomass contributes 10% of the UKs primary emissions of $PM_{2.5}$ and this contribution is reported to be increasing.

Further, the Council has powers it can exercise against people causing a statutory nuisance through bonfires and will investigate allegations of nuisance made.

Whilst there are currently no smoke control areas in Wiltshire, the merits of declaration of these can also be investigated.

S20 CBA: AQ (1) x Ex (3) x Po (3) - £ (1) = Overall Rating (8)

Modelled Measures

Air dispersion modelling was undertaken for identified measures. ADMS (Air Dispersion Modelling Software, Ref. 32) was used to model the road traffic within each respective Salisbury AQMA. Further details are provided in the following sections: Appendix E: Dispersion Modelling and Appendix F: Model Verification.

It should be noted that no single measure alone will have the desired effect of achieving compliance with the AQO in the AQMAs and therefore it will likely take a combination of multiple measures to reduce pollutant concentrations to compliance.

A subset of results for the baseline and future year scenarios with and without the are presented throughout the main report. For comparison, the 2019 baseline results are also modelled with the measures in place to provide some insight into the effectiveness and expected impacts of the measure.

Salisbury AQMAs

The following four measures have been modelled within the three Salisbury AQMAs:

A1 Improvements to active travel routes in the City centre (10)

A2 Improving the rail station connectivity with the city (15)

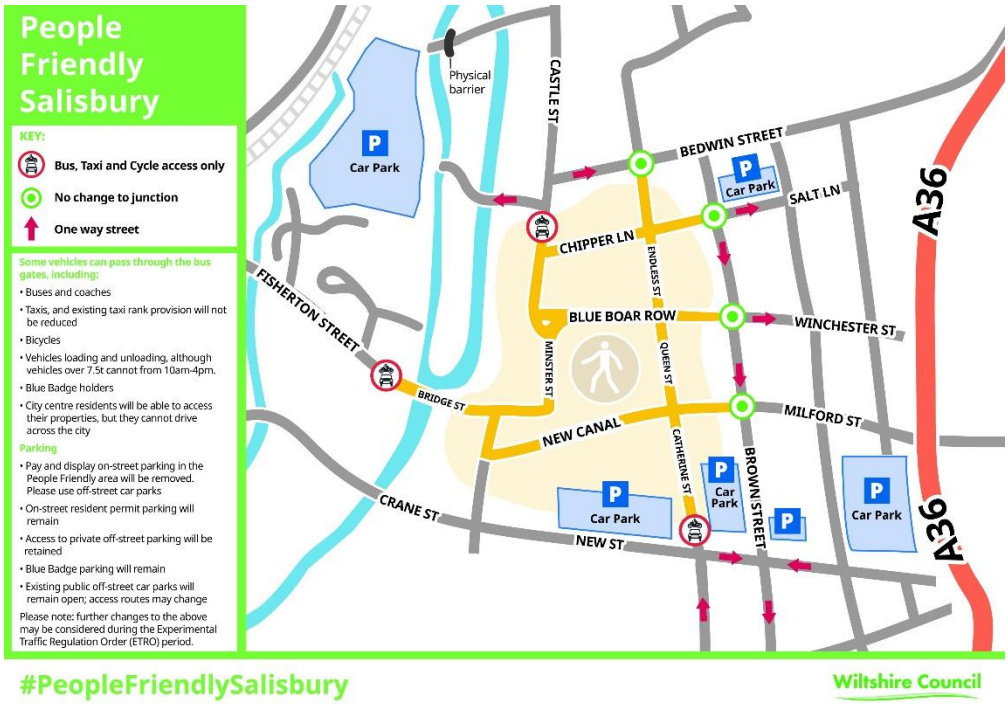
A3 Improvements to junction near Wilton, Harnham gyratory and Exeter Street roundabout (4)

A4 MOVA upgrade on A36 roundabout traffic lights along Churchill Way (7)

A1 Improvements to active travel routes in the city centre.

The People Friendly Streets initiative, as illustrated in Figure 5-1, was introduced during the COVID pandemic to enhance the city realm. It placed priority on pedestrians rather than cars and was complimentary to the aim of the Air quality management area, The scheme implementation coincided with the second COVID lockdown and was withdrawn in late 2020 due to concerns around the impact on businesses in the city centre. The scheme involved the implementation of a series of bus gates on roads in and around the Guildhall & Market Square, so was focused on reducing through traffic through the city centre creating a safer and more pleasant environment for those shopping and using the city centre, beyond that already achieved by removing cark parking from the Market Square. Wide exemptions were incorporated into the scheme for emergency vehicles; buses and coaches; taxis; zone residents; Blue Badge holders and the loading of vehicles. Vehicles over 7.5t were only excluded between 10am and 4pm.

Figure 5-1: People Friendly Streets



In the short period that the scheme was in place, Vivacity monitoring was undertaken which showed approximately an 11% shift toward sustainable travel modes across all of the monitoring locations (further details are provided in the Appendix). This measure was therefore beneficial from a purely air quality perspective.

Alternative schemes will be investigated as part of the AQAP with similar objectives as set out in the draft Salisbury Local Cycling and Walking Infrastructure Plan (LCWIP).

Table 5-2 illustrates the locations that would benefit from the largest potential NO_2 reductions with the measure in place.

Table 5-2: Results of the Baseline and Future year scenario with and without measure A1

Receptor ID	Address	NO_2 Annual Mean ($\mu g/m^3$)					
		2019			2026		
		Without Measure	With Measure	Change in NO_2	Without Measure	With Measure	Change in NO_2
RS091	Merchant House 21 Oatmeal Row SP1 1TH	37.7	35.7	-1.9	23.3	22.3	-1.0
RS089	Flat 2 48 - 52 Silver Street SP1 2NE	36.5	34.6	-1.8	22.5	21.5	-0.9

Receptor ID	Address	NO_2 Annual Mean (µg/m^3)					
		2019			2026		
		Without Measure	With Measure	Change in NO_2	Without Measure	With Measure	Change in NO_2
RS229	132 Castle Street SP1 3UA	35.3	33.6	-1.7	22.1	21.2	-0.9
RS065	The White Horse Hotel Castle Street SP1 1BN	34.6	32.9	-1.7	21.7	20.8	-0.9
RS275	Flat 1 11-13 Minster Street SP1 1TB	34.5	32.9	-1.7	21.6	20.7	-0.9
RS064	Flat 127 South Western Road SP2 7RR	28.7	28.7	-0.1	19.1	19.1	-0.1
RS134	109A Fisherton Street SP2 7SP	30.6	30.4	-0.2	19.9	19.8	-0.1

NO_2 concentrations shown in bold indicate exceedances of the AQS objective for annual mean NO_2 set at 40 µg/m^3, and underlined figures indicate potential exceedances of the short-term (1-hour) NO_2 objective.

The predicted concentrations at the receptors were generally observed to already be below the annual mean objective of 40 µg/m^3 in 2019 (with the exception of Southwestern Road), with drops in the nitrogen dioxide concentration of up to 1.9 µg/m^3 resulting from the implementation of pedestrianisation in the city centre. The implementation of the scheme indicates that a possible reduction of the nitrogen dioxide concentrations in the future year 2026 scenario of up to 1.0 µg/m^3 at sensitive receptors in and around the connected roads. This appears small but in air quality reduction terms it is significant.

A1 CBA: AQ (2) x Ex (3) x Po (2) - £ (2) = Overall Rating (10)

A2 Improving the rail station connectivity with the city.

Southwestern Railways are implementing a cycle hub in the station forecourt in the summer of which will include 94 cycle parking spaces and 10 e-bike docking charging stations, which would serve to reduce overall vehicle trips associated with the station.

Following the Central Area Framework, the Council is currently designing improvements to the rail station, Fisherton Street and Southwestern Road including two new bus stops in the station forecourt (enabling the Amesbury bus and the

Downton bus to be extended to the station), improved routes for people who walk or use mobility vehicles around the forecourt, wider footways and more planting along Fisherton Street and Southwestern Road, supported by funding from the Future High Streets initiative. This measure will be updated through the life cycle of the AQAP as more detailed plans have become available.

A2 CBA: AQ (2) x Ex (3) x Po (3) - £ (3) = Overall Rating (15)

A3 Improvements to junction near Wilton, Harnham Gyratory and Exeter Street roundabout.

As previously noted, the junctions near Wilton have been identified as having congestion issues that has triggered air quality issues in the area. Potential improvements at these junctions are aimed at easing congestion and improving traffic flow in the Salisbury City Centre AQMA. The modelling of this measure was carried out with the following assumptions:

- Park Wall junction is located over a mile away from the modelled road network, this junction was not included; and
- Estimated improvements in travel time were implemented to affected roads during the AM (07:00 to 10:00) and PM peak periods (16:00 to 19:00) based on conservative estimates (i.e. 23% reduction in travel time, Ref. 34).

Table 5-3 below illustrates the locations that would benefit from the largest potential NO_2 reductions with the measure in place.

Table 5-3: Results of the Baseline and Future year scenario with and without measure A3

Receptor ID	Address	NO_2 Annual Mean (µg/m^3)					
		2019			2026		
		Without Measure	With Measure	Change in NO_2	Without Measure	With Measure	Change in NO_2
RS017	Flat 2 131 Exeter Street SP1 2SG	39.2	38.7	-0.5	24.2	24.0	-0.3
RS055	Waters Edge 1 New Bridge Road Harnham SP2 8AA	31.9	31.4	-0.5	20.8	20.5	-0.3

Receptor ID	Address	NO_2 Annual Mean (µg/m^3)					
		2019			2026		
		Without Measure	With Measure	Change in NO_2	Without Measure	With Measure	Change in NO_2
RS071	60 Hurley House Carmelite Way SP1 2HN	33.9	33.5	-0.5	21.3	21.1	-0.2
RS072	38 Norton House Carmelite Way SP1 2HL	33.9	33.4	-0.5	21.3	21.0	-0.2
RS070	80 Cleeve House Carmelite Way SP1 2HN	33.5	33.0	-0.5	21.0	20.8	-0.2

NO_2 concentrations shown in bold indicate exceedances of the AQS objective for annual mean NO_2 set at 40 µg/m^3, and underlined figures indicate potential exceedances of the short-term (1-hour) NO_2 objective.

The predicted concentrations at the receptors were generally observed to already be below the annual mean objective of 40 µg/m^3 in 2019, though one site was within 10% of the AQO. The improvements to the respective junctions indicate that a possible reduction of the NO_2 concentrations in the future year 2026 scenario of up to 0.3 µg/m^3 at sensitive receptors on and around the connected roads.

A3 CBA: AQ (1) x Ex (3) x Po (2) - £ (2) = Overall Rating (4)

A4 MOVA upgrade on A36 roundabout traffic lights along Churchill Way.

The MOVA upgrades across roundabouts traffic lights along A36 help encourage quicker flow across the northern part of the Salisbury City Centre and Wilton Road AQMAs. The modelling of this measure was carried out with the following assumptions (further details provided in the Appendix):

- Based on possible improvements of 10-20%, a conservative estimate of 10% increase in speed has been applied for this measure to applicable roads.
- This improvement was applied to the AM (07:00 to 10:00) and PM peak periods (16:00 to 19:00).

Table 5-4 displays the locations that would benefit from the largest potential NO_2 reductions with the measure in place.

Table 5-4: Results of the Baseline and Future year scenario with and without measure A4

Receptor ID	Address	NO_2 Annual Mean (µg/m^3)					
		2019			2026		
		Without Measure	With Measure	Change in NO_2	Without Measure	With Measure	Change in NO_2
RS059	3B York Road SP2 7AP	**51.1**	**50.8**	-0.3	30.9	30.7	-0.2
RS185	22 Castle Road SP1 3RJ	**45.6**	**45.3**	-0.3	27.9	27.7	-0.2
RS198	2 Nelson Road SP1 3LT	**43.1**	**42.7**	-0.4	26.4	26.2	-0.2
RS048	5 St Marks Avenue SP1 3DH	**42.4**	**42.1**	-0.3	26.0	25.8	-0.2
RS152	64 Meadow Road SP2 7BL	**41.0**	**40.6**	-0.4	25.0	24.8	-0.2
RS117	6D Wilton Road SP2 7EE	46.1	45.8	-0.3	26.0	25.9	-0.1
RS114	26 Wilton Road SP2 7EJ	39.1	38.9	-0.2	22.3	22.3	-0.1

NO_2 concentrations shown in bold indicate exceedances of the AQS objective for annual mean NO_2 set at 40 µg/m^3, and underlined figures indicate potential exceedances of the short-term (1-hour) NO_2 objective.

Nitrogen dioxide concentrations predicted at sensitive receptors for 2019 baseline scenario at Churchill Way North/West and adjoining roundabouts were above the nitrogen dioxide annual mean AQO. These concentrations are predicted to drop below the thresholds in 2026, and with the MOVA upgrades, additional drops of up to 0.2 µg/m^3 are expected.

A4 CBA – AQ (1) x Ex (3) x Po (3) - £ (2) = Overall Rating (7)

Further Measures

The following measures specific to Salisbury are included within the AQAP, but have not been explicitly modelled:

A5 Improvements to the A36 Trunk Road through Salisbury (3)

A6 Targeting Ind. Estate LGVs (3)

A7 Salisbury Park and Ride (6)

A8 Salisbury Transport & Parking Strategy (15)

A5 Improvement to the A36 Trunk road through Salisbury.

National Highways has previously carried out a study on Southampton Road and was not able to identify a feasible improvement scheme. This considered additional traffic lanes, junction improvements and removing the central barrier. Modelling of those options showed that the traffic problems would be moved around, but not resolved or improved. National Highways, in partnership with Wiltshire Council, is now prioritising Southampton Road and College Roundabout, and is currently working on an Option Assessment Report (OAR) for this part of the road, which will look at various solutions to improve traffic flows and reduce congestion.

National Highways has identified a number of improvement options, and is testing these using traffic modelling to identify potential improvement options in the area, and to establish their effectiveness. The two authorities are also undertaking traffic surveys to provide up-to-date traffic flows data. Once the report has been completed, National Highways will report its findings and recommendations to the council, undertake further feasibility, value for money and design work before moving the scheme forward.

It is recognised that there is a historic and ongoing desire for a Salisbury bypass. The Council supports the principle of a bypass for Salisbury but the strategic need for it will be understood through the Department for Transport / National Highways M4 to Dorset Coast RIS2 (Road Investment Strategy) study 2020-2025. If identified as a need and a priority, the scheme would be progressed through a subsequent round(s) of the RIS and / or through the DfT's Major Road Network / Large Local Majors process and the Western Gateway Sub-national Transport Body. This is unlikely to deliver any

improvements in the short to medium term and costs would be well in excess of £100 million.

A5 CBA: AQ (3) x Ex (2) x Po (1) - £ (3) = Overall Rating (3)

A6 Targeting Industrial Estate Light Good Vehicles

Light Goods Vehicles (LGV) emissions from the Industrial Estate are known to largely contribute to exceedances on Southwestern Road. The feasibility of wider re-development of the industrial estate will be explored, as will the creation of preferential routes for LGVs.

A6 CBA – AQ (1) x Ex (2) x Po (2) - £ (1) = Overall Rating (3)

A7 Salisbury Park and Ride

The Salisbury Park & Ride services (Ref. 29) are an ideal way for people to visit the historic city and limit the environmental impact of their journey. They continue to form a key part of the solution to the nitrogen dioxide exceedances in the city. Salisbury has five Park & Ride sites on the main routes into the city that offer:

- Modern comfortable buses with low floors for easy access,
- Three buses on the network are electric. The council will look to introduce further electric buses if funding from the government becomes available.
- Buses running every 12 to 15 minutes,
- over 2,000 parking spaces,
- Free car parking for all and,
- Free bus travel for concessionary bus pass holders after 09:30 weekdays and all-day Saturdays and Bank Holidays,

All the sites are open from Monday to Saturday but are closed on Sundays and public holidays:

- Wilton off A36 The Avenue (west of the city);
- Britford A338 Downton Road (to the southeast

- London Road A30 London Road (to the northeast) and
- Petersfinger A36 Southampton Road (to the east)
- The Beehive Park & Ride* (to the north of the city)

*Temporarily closed during the COVID19 pandemic & used as a Coronavirus testing site during the pandemic.

During the pandemic bus patronage fell. The services will need support to return to their previous trajectory of gradual increasing usage.

The council aims to improve usage of the Park & Ride system through a variety of measures including:

- Improved and extended bus lane along the A345 Castle Road
- Bus priority through signals (i.e., allowing signals to change faster if the bus is late) to be implemented at strategic junctions as funding becomes available.
- Measures identified as part of the Salisbury Parking Implementation Plan (see below).

A7 CBA – AQ (2) x Ex (3) x Po (3) - £ (3) = Overall Rating (15)

A8 Salisbury Transport & Parking Strategies

The Salisbury Transport Strategy (Ref. 30), covering the Salisbury and Wilton area, has been developed to support the growth identified in the South Wiltshire Core Strategy and the Wiltshire Core Strategy. This work will be updated to address proposals for new development set out within the emerging Local Plan Review.

In addition to the Council wide strategy, a parking implementation plan specific to Salisbury will be developed as part of LTP4, which will further encourage the uptake of low emission vehicles in the county.

Any LTP4 strategies including the Salisbury Parking Implementation Plan and Salisbury LCSWIP will be informed by air quality levels in the city moving through the lifetime of the AQAP, and both will prioritise more sustainable means of transport where possible.

A8 CBA – AQ (1) x Ex (2) x Po (3) - £ (1) = Overall Rating (5)

Bradford-on-Avon AQMA

Nitrogen dioxide concentrations within Bradford-on-Avon have remained relatively static over the years, with several monitoring locations have exceeded the annual mean objective. It is now appropriate to identify further measures, and if necessary, re-visit previously suggested schemes, to secure compliance with the air quality objectives.

The following three measures were modelled individually for the Bradford-on-Avon AQMA:

A9 Re-introduction of one-way system (16)

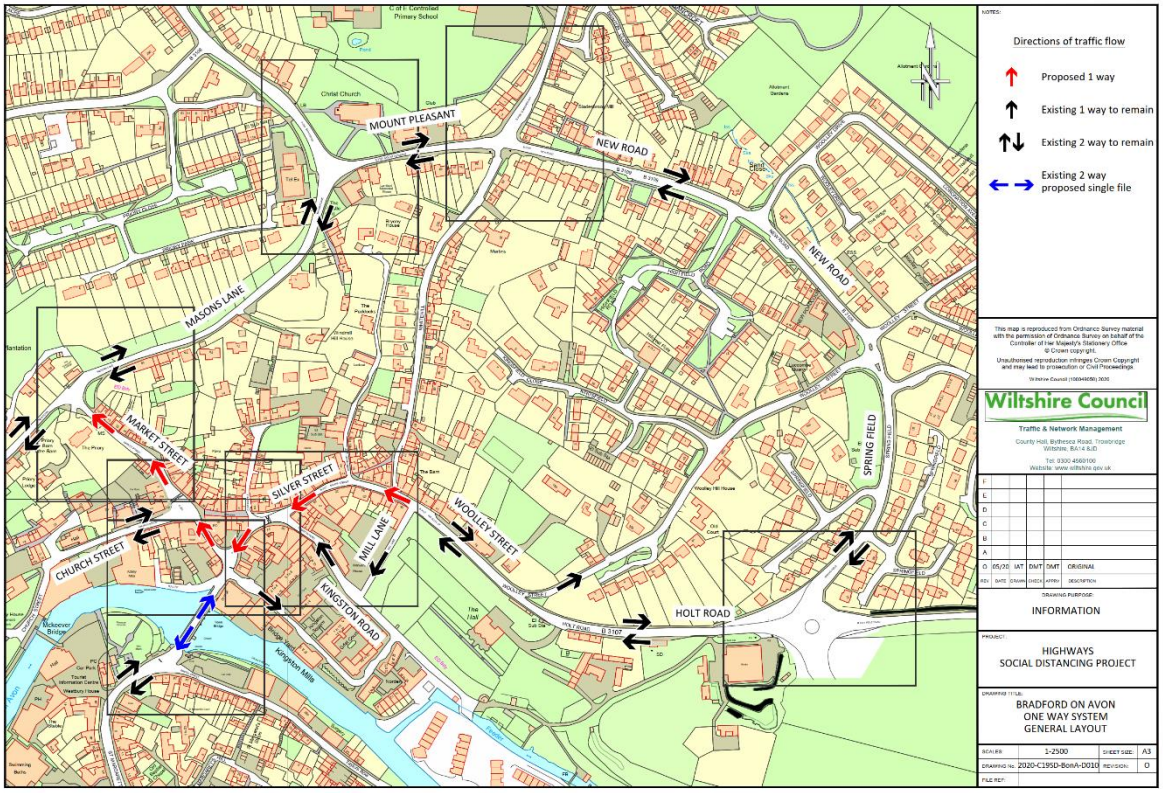
A10 Stricter weight limits restriction on Town Bridge (11)

A11 Tree crown reduction on Masons Lane (2)

A9 Re-introduction of one-way system

During the COVID-19 pandemic, some streets were converted into a one-way system in Bradford-on-Avon town, primarily to facilitate social distancing along the pavements. Market Street and Silver Street were made into one-way streets. The re-introduction of this one-way system, and the impact on the surrounding road network was modelled to look at identifying the possible improvements a more permanent scheme could achieve.

Figure 5-2: Map of One-way System Changes Made During 2020



A similar road network to that shown in Figure 5-2 above was modelled in ADMS through an assumed conversion of Silver Street and Market Street into one-way roads. The opposing traffic flows removed from these two roads were then diverted onto a loop around Bridge Yard and Kingston Road as an alternative route for traffic.

Table 5-5 displays the largest impacts from the measure in place, which are modelled along Masons Lane and Market Street.

Table 5-5: Results of the Baseline and Future year scenario with and without measure A9

Receptor ID	Address	NO_2 Annual Mean (µg/m^3)					
		2019			2026		
		Without Measure	With Measure	Change in NO_2	Without Measure	With Measure	Change in NO_2
RB26	Silver Street Bradford On Avon BA15 1JX	68.5	30.0	-38.5	43.7	19.9	-23.8
RB33	Swan Hotel Church Street BA15 1LN	**65.1**	**43.8**	-21.4	**41.3**	27.6	-13.7

Receptor ID	Address	NO_2 Annual Mean (µg/m^3)					
		2019			2026		
		Without Measure	With Measure	Change in NO_2	Without Measure	With Measure	Change in NO_2
RB39	10 Market Street BA15 1LL	**53.9**	36.7	-17.2	34.1	23.1	-11.0
RB38	15A Market Street BA15 1LL	**49.8**	33.7	-16.1	31.5	21.4	-10.1
RB40	7A Market Street BA15 1LH	24.9	19.0	-5.9	16.4	13.0	-3.4
RB43	7 Masons Lane BA15 1QN	**54.8**	**54.1**	-0.7	34.3	33.9	-0.4
RB12	Westbury House St Margarets Street BA15 1DE	36.3	37.3	+1.0	24.0	24.6	+0.6
RB14	42 Silver Street BA15 1JX	**41.1**	**42.0**	+0.9	26.9	27.6	+0.7

NO_2 concentrations shown in bold indicate exceedances of the AQS objective for annual mean NO_2 set at 40 µg/m^3, and underlined figures indicate potential exceedances of the short-term (1-hour) NO_2 objective.

A9 CBA – AQ (3) x Ex (3) x Po (2) - £ (2) = Overall Rating (16)

A10 Stricter weight limits restriction on Town Bridge

The town bridge, located across the River Avon, was modelled to have a stricter weight restriction imposed along the bridge by introducing a 7.5-tonne weight limit to replace the 18-tonne weight limit. This measure was aimed at reducing the HGVs travelling through the town via the bridge across the AQMA. The EFT v10.1 (Ref. 19) was amended by adjusting the default fleet composition of the Heavy Goods Vehicles (HGVs) where possible, assuming all were below the required weight threshold. This change was imposed across the entire modelled road network in Bradford-on-Avon.

Table 5-6 displays the largest impacts from the measure in place, which are modelled along Masons Lane and Market Street.

Table 5-6: Results of the Baseline and Future year scenario with and without measure A10

Receptor ID	Address	NO_2 Annual Mean (µg/m^3)					
		2019			2026		
		Without Measure	With Measure	Change in NO_2	Without Measure	With Measure	Change in NO_2
RB42	10 Masons Lane BA15 1QN	**56.1**	**51.5**	-4.6	35.1	33.4	-1.7
RB43	7 Masons Lane BA15 1QN	**54.8**	**50.3**	-4.5	34.3	32.6	-1.7
RB26	Flat 3 Silver Street BA15 1JX	**68.5**	**63.9**	-4.6	**43.7**	**42.3**	-1.5
RB33	Swan Hotel Church Street BA15 1LN	**65.1**	**60.6**	-4.6	**41.3**	39.9	-1.4
RB30	Shambles Day Nursery Unit 2 10 The Shambles	**64.4**	**59.9**	-4.5	**40.9**	39.5	-1.4
RB39	10 Market Street BA15 1LL	**53.9**	**50.1**	-3.8	34.1	32.9	-1.2

NO_2 concentrations shown in bold indicate exceedances of the AQS objective for annual mean NO_2 set at 40 µg/m^3, and underlined figures indicate potential exceedances of the short-term (1-hour) NO_2 objective.

Receptors on Masons Lane (RB 41-47) had an average nitrogen dioxide concentration change of approximately -2.4 µg/m^3 and -0.9 µg/m^3 in 2019 and 2026 scenarios respectively. Receptors located on Market Street (RB 26, 30-40) had an average change of approximately -2.6 µg/m^3 and -0.8 µg/m^3 in two respective scenarios. The model output predicted with the measure implemented in 2026 that all receptors except RB 26 would be below the annual mean objective value of 40 µg/m^3.

A10 CBA – AQ (2) x Ex (3) x Po (2) - £ (1) = Overall Rating (11)

A11 Tree crown reduction on Masons Lane

This measure was chosen as it targets the removal of the observed canyon effect, caused by vegetation on one side of the road and housing on the other, of emissions released from vehicles travelling along Masons Lane re-circulating, increasing nitrogen dioxide concentrations. By removing the foliage from one side of the road, dispersion

should improve, and concentrations are expected to decrease along the route and yield improved air quality at the façades of the properties on Masons Lane. ADMS has the option to include so called 'street-canyons' on modelled roads, which was included within the baseline scenarios, and this was removed from the model as part of the measure analysis as a proxy for the vegetation removal.

Table 5-7 displays the largest impacts from the measure in place, modelled along Masons Lane.

Table 5-7: Results of the Baseline and Future year scenario with and without measure A11

Receptor ID	Address	NO_2 Annual Mean (µg/m^3)					
		2019			2026		
		Without Measure	With Measure	Change in NO_2	Without Measure	With Measure	Change in NO_2
RB42	10 Masons Lane BA15 1QN	**56.1**	35.1	-22.0	35.1	21.5	-13.6
RB43	7 Masons Lane BA15 1QN	**54.8**	34.3	-19.8	34.3	22.1	-12.2

NO_2 concentrations shown in bold indicate exceedances of the AQS objective for annual mean NO_2 set at 40 µg/m^3, and underlined figures indicate potential exceedances of the short-term (1-hour) NO_2 objective.

Elevated nitrogen dioxide concentrations were modelled in 2019 at receptors RB 42 (56.1 µg/m^3) and RB 43 (54.8 µg/m^3). These receptors are estimated to have a significant drop through the removal of the canyon of 22.0 and 19.8 µg/m^3 µg/m^3 respectively. This would equate to being below the annual mean objective value for nitrogen dioxide in 2019. Similar reductions, though to a lesser extent, were also modelled in the 2026 future scenario with a reduction to just over 50% of the annual mean objective for nitrogen dioxide. This measure is localised purely to Masons Lane and has no air quality impacts in other areas of the AQMA. It is considered likely that these impacts are an overestimate of the potential improvements, as the canyon effect is removed completely, whereas in reality the properties will remain so some entrainment of emissions will still occur.

A11 CBA – AQ (3) x Ex (1) x Po (1) - £ (1) = Overall Rating (2)

Westbury AQMA

Modelled Measures

The AQMA in Westbury is along the A350 which forms part of the Major Road Network. Options for improvements to the exiting road system are extremely limited by the physical layout of the road through the town centre.

One measure for specific to Westbury AQMA was modelled for potential impacts.

A12 Junction optimisation at A350 (9)

A12 Junction optimisation at A350

The proposed improvements centre around two roundabouts along the A350:

- Roundabout where A350 meets B3098 (Bratton Road); and
- Roundabout where A350 meets B3097 (Station Road).

The locations of the potential improvements are at the heart of the AQMA in Westbury and these are envisaged to help improve the traffic flow through the town. Speeds on the affected roads were increased to model improvements in traffic flows from the junction changes. Table 5-8 displays the locations with the highest nitrogen dioxide potential impacts with the measure in place, modelled at receptors along Haynes Street and Warminster Road.

Table 5-8: Results of the Baseline and Future year scenario with and without measure A12

Receptor ID	Address	NO_2 Annual Mean (µg/m^3)					
		2019			2026		
		Without Measure	With Measure	Change in NO_2	Without Measure	With Measure	Change in NO_2
RW30	Flat 1 18 Warminster Road BA13 3PB	**48.1**	**46.3**	-1.9	27.9	26.7	-1.2
RW26	53 Haynes Road BA13 3HD	**43.7**	**42.2**	-1.5	25.2	24.2	-1.0
RW06	69 Warminster Road BA13 3PJ	**43.0**	**41.6**	-1.4	24.6	23.7	-0.9
RW33	49B Warminster Road BA13 3PJ	**42.7**	**41.3**	-1.4	24.4	23.5	-0.9

NO_2 concentrations shown in bold indicate exceedances of the AQS objective for annual mean NO_2 set at 40 µg/m^3, and underlined figures indicate potential exceedances of the short-term (1-hour) NO_2 objective.

With the measure in place, reductions of up to 1.9 µg/m^3 and 0.9 µg/m^3 in the baseline and future year scenarios were modelled across the receptors in the vicinity of the AQMA. The greatest impacts are likely to be observed on Warminster Road, with traffic congestion prevalent along this road, as demonstrated by the reductions in nitrogen dioxide concentrations at receptors RW 30, RW 06 and RW 33.

A12 CBA – AQ (2) x Ex (3) x Po (2) - £ (3) = Overall Rating (9)

Further Measures

Three further measures for the Westbury AQMA have been included within the AQAP, but were not explicitly modelled:

A13 Improvements to the A350 (6)

A14 Peak hour re-routing of traffic (2)

A15 Sustainable Last Mile Deliveries (7)

Error! Reference source not found. **Improvements to the A350.**

It is an objective of the Wiltshire Councils Business Plan 2022-2032 to have vibrant, well-connected communities. The plan includes an aim for "*major road programmes to reduce congestion and air pollution, and explore solutions to issues at J17 M4, Salisbury, Melksham and Westbury".*

Westbury Town Council has asked Wiltshire Council for assistance in developing a plan for an Eastern A350 by-pass of the town.

Wiltshire Council intends to bid for funds to make improvements to the A350 in Westbury in the next round of government funding in 2025, by which time compliance with the objective may already have been achieved. That, and the fact that no detailed plans are available at present to facilitate dispersion modelling, mean this measure was not considered for its quantitative impact, though this would likely be 'High' by the definitions in Table 5-1 within the AQMA itself.

A13 CBA – AQ (3) x Ex (1) x Po (3) - £ (3) = Overall Rating (6)

A14 Peak Hour Re-Routing of Traffic

We will investigate the viability of alternative routes through the AQMA during morning and evening peak periods, in order to help ease congestion at the busiest times. This may be limited to particular vehicle types, such as HGVs.

A14 CBA – AQ (2) x Ex (2) x Po (1) - £ (2) = Overall Rating (2)

A15 Sustainable Last Mile Deliveries.

LGVs have been identified as a significant source of traffic emissions in both Westbury and Marlborough, many of which will be related to deliveries. We propose to explore whether viable schemes can be brought forward. An e-bike delivery scheme in Salisbury has unfortunately closed due to issues of viability. Whether viability and acceptance will change thought the lifetime of time this plan will observed. The way ahead might be achieved by starting with an e-Bike hire scheme and E-bike cargo hire over a wider area than one town to build critical mass.

A15 CBA – AQ (1) x Ex (3) x Po (3) - £ (2) = Overall Rating (7)

Marlborough AQMA

The exceedances of the nitrogen dioxide annual mean are on the A346 through the town. This provides a significant North/south transport link between the M4/ Swindon to the south coast. It is acknowledged that with the town there is a desire to see a reduction in HGVs passing through the town and for the route to be de-primed, the latter having been refused by the Highway Authority (Wiltshire Council).
Modelling has been carried out, but the baseline modelled data for 6 Barn Street was 75ug/m^3 compared with measured data of 37ug/m^3. We have rejected the modelling as this disparity between measured and modelled is not credible to take forward. The following two measures have subsequently been developed:

A16 facilitate shift from diesel to electric (18)

A17 Improve connectivity within Marlborough Area (4)

A16 Facilitate a shift from diesel to electric vehicles.

The major contributor to poor air quality is diesel powered cars. The transition to electric vehicles as supported by Government policy will not occur if there is an absence of infrastructure to support people in making this move. There is a significant amount of public parking in the centre of Marlborough, and we will therefore seek to facilitate establishment of private (serving new development) and public electric charging points in line with the draft SPD on Air Quality. We will also seek delivery of foot and cycleway provision to maximise opportunities to improve connectivity in the immediate area, in line with the emerging Marlborough Neighbourhood plan.

A16 CBA: AQ (2) x Ex (3) x Po (3) - £ (0) = Overall Rating (18)

A17 Improve connectivity within the Marlborough area.

There is a particular dependence on the private car in the Marlborough area. There is no longer a rail link from Marlborough, the nearest stations being Great Bedwyn and

Swindon. Through the life of this plan, we will examine means to build greater connectivity between public transport services and promote their use in order to reduce dependency on the private car and reduce social exclusion through lack of access to public transport through S106 and CIL funding and other opportunities that may arise including bidding for grant funding from DEFRA.

Marlborough Town Council is undertaking a traffic survey and modelling. The Action plan is a “living” document and through its life will be reviewed. Any measures that are supported locally can reviewed for potential incorporation into the plan.

A17 CBA: AQ (1) x Ex (2) x Po (2) - £ (0) = Overall Rating (4)

Devizes AQMA

A single measure has been considered for the Devizes AQMA, related to improvements around a specific junction.

A18 Junction improvements around Shanes Castle/Wadworth junction (6)

A18 Junction improvements around Shanes Castle/Wadworth junction

Where the A342 Dunkirk Hill and the A361 Bath Road meet, air quality concentrations have been elevated because of heavy queuing along the roads. The modelled traffic speeds were raised to simulate a reduction in congestion on roads the vicinity of Shanes Castle and Wadworth junction. **Error! Reference source not found.** illustrates the locations with the highest nitrogen dioxide potential impacts with the measure in place, modelled at receptors along A342 Dunkirk Hill and the A361 Bath Road.

Table 5-9: Results of the Baseline and Future year scenario with and without measure A18

Receptor ID	Address	NO_2 Annual Mean (µg/m^3)					
		2019			2026*		
		Without Measure	With Measure	Change in NO_2	Without Measure	With Measure	Change in NO_2
RD004	Shanes Castle Bath Road SN10 2AY	**46.4**	**46.3**	-0.1	28.4	28.2	-0.2

Recept or ID	Address	NO_2 Annual Mean (µg/m³)					
		2019			2026*		
		Without Measure	With Measure	Change in NO_2	Without Measure	With Measure	Change in NO_2
RD008	The Cedars Bath Road SN10 2AP	28.0	27.1	-0.9	17.9	16.8	-1.2
RD009	25 The Nursery SN10 2AG	32.9	31.6	-1.4	21.0	19.2	-1.7
RD010	16 The Nursery SN10 2AQ	32.1	30.7	-1.4	20.5	18.7	-1.8
RD011	1 The Old Artichoke Apartments SN10 2AA	31.5	30.2	-1.3	20.1	18.5	-1.6
RD012	6 Melbourne Place SN10 2AB	28.8	27.6	-1.2	18.5	17.0	-1.5
RD013	Red House Bath Road SN10 2AN	26.4	25.4	-1.0	17.0	15.8	-1.2
RD018	3 Cyprus Terrace SN10 1JR	**47.4**	**47.3**	-0.1	28.8	28.6	-0.1

NO_2 concentrations shown in bold indicate exceedances of the AQS objective for annual mean NO_2 set at 40 µg/m³, and underlined figures indicate potential exceedances of the short-term (1-hour) NO_2 objective. *2026 baseline speeds are lower, hence the greater improvement in concentrations

With the measure in place, reductions of up to 1.4 µg/m³ and 1.8 µg/m³ in the baseline and future year scenarios are expected across modelled receptors in the vicinity of the AQMA. The greatest impacts are likely to be observed on The Nursery Road, with traffic congestion prevalent along this road, as demonstrated by the reductions in NO_2 concentrations at receptors RD009, RD010 and RD011.

A18 CBA: AQ (2) x Ex (3) x Po (2) - £ (3) = Overall Rating (9)

Further Measures

Two further measures for the Devizes AQMA have been included within the AQAP:

A19 Devizes Transport Strategy (8)

A20 Devizes Canal Towpath Cycle route (7)

A19 Devizes Transport Strategy

A Transport Strategy for Devizes has been in place since 2016, and the Council will continue to implement, and possibly refresh, the plan to target pollution hotspots.

A19 CBA – AQ (1) x Ex (3) x Po (3) - £ (1) = Overall Rating (8)

A20 Devizes Canal Towpath Cycle route

The provision of new cycle way along canal towpath should help to encourage active journeys in the town. The works is in progress at the time of writing. Four out of five phases are complete, but no funding for phase 5 has been identified at this stage. Funding to completion will be sought as part of the AQAP.

A20 CBA – AQ (1) x Ex (3) x Po (3) - £ (2) = Overall Rating (7)

Calne AQMA

Two measures were modelled for their impact on NO_2 concentrations, as follows:

A21 Re-routing traffic via high street (2)

A22 Upgrade of buses from Euro IV to Euro VI (7)

A21 Re-routing traffic via High Street

The traffic flow through Calne Town Centre has been identified to be very high (Ref. 31). To help ease the delays and congestion, the previously pedestrianised High Street was modelled to allow traffic to flow through again. Traffic was simulated to be removed from the adjacent links and rerouted through the High Street (further details provided in the Appendix). Table 5-10 shows the locations with the largest potential impacts on nitrogen dioxide with the measure in place.

Table 5-10: Results of the Baseline and Future year scenario with and without measure A21

Receptor ID	Address	NO_2 Annual Mean (µg/m^3)					
		2019			2026		
		Without Measure	With Measure	Change in NO_2	Without Measure	With Measure	Change in NO_2
RC43	Mole End Quarr, Barton SN11 0EB	15.0	14.7	-0.3	10.2	10.0	-0.2
RC56	12 Curzon Street SN11 0DD	25.3	25.1	-0.2	15.9	15.8	-0.1
RC59	6 Curzon Street SN11 0DD	24.1	23.9	-0.2	15.2	15.1	-0.1
RC34	5 Market Hill SN11 0BU	14.5	14.4	-0.1	9.9	9.8	-0.1
RC51	6 - 8 Wood Street SN11 0DA	21.3	21.3	+0.1	13.7	13.7	<0.1
RC57	Flat 2 5A Wood Street SN11 0BZ	21.9	22.0	+0.1	14.0	14.1	+0.1
RC54	5 The Square SN11 0BY	23.2	23.4	+0.2	14.7	14.9	+0.1
RC49	Flat 1A 1 Phelps Parade SN11 0HA	21.7	21.9	+0.3	13.9	14.0	+0.1
RC30	2 London Road SN11 0AB	29.7	29.7	<0.1	18.7	18.7	<0.1

NO_2 concentrations shown in bold indicate exceedances of the AQS objective for annual mean NO_2 set at 40 µg/m^3, and underlined figures indicate potential exceedances of the short-term (1-hour) NO_2 objective.

There impacts of re-opening the High Street to road traffic are two-fold. Firstly, concentrations along the southern half of both the Square and Curzon Street (RC 43, RC 56, RC 59, and RC 24) all display a reduction in NO_2 concentrations across both the baseline and future year scenarios. Secondly, there are slight increases noted at other receptors (RC 51, RC 57, RC 54 and RC 49) along the Square which are closer to the High Street but there is an overall net benefit experienced across all impacted receptors in the vicinity of the High Street of -0.3 µg/m^3 and -0.2 µg/m^3 in the 2019 and 2026 scenarios respectively. As this scenario was based on the manual adjustment of

traffic flows rather than an updated strategic traffic model, it is considered likely that further distributional impacts may occur elsewhere within the vicinity that could not be considered due to the limitations of the method.

A21 CBA – AQ (1) x Ex (2) x Po (2) - £ (2) = Overall Rating (2)

A22 Upgrade of buses from Euro IV to Euro VI

Decreases in nitrogen dioxide concentrations are modelled across the entire road network with the biggest impacts found on sensitive receptors on New Road and to a lesser extent on The Square/Wood Street. In particular, Receptors RC 31 and RC 28 were considerably above the annual mean AQO for nitrogen dioxide and through changes of the engine standard, concentrations at these receptors were estimated to decrease by up to 0.5 µg/m3 and 0.4 µg/m3 within the 2019 and 2026 scenarios, respectively.

Table 5-11A: Results of the Baseline and Future year scenario with and without measure A22

Receptor ID	Address	NO_2 Annual Mean (µg/m^3)					
		2019			2026		
		Without Measure	With Measure	Change in NO_2	Without Measure	With Measure	Change in NO_2
RC31	Girl Guides Hall Silver Street SN11 0JE	**53.2**	**52.7**	-0.5	32.4	32.0	-0.4
RC28	30 New Road SN11 0JQ	**51.2**	**50.8**	-0.5	31.2	30.8	-0.4
RC29	35A New Road SN11 0JQ	32.0	31.7	-0.3	19.7	19.4	-0.2
RC55	The Wheatsheaf Curzon Street SN11 0DD	29.2	28.9	-0.3	18.1	17.9	-0.2
RC45	13A Wood Street, SN11 0BZ	26.5	26.2	-0.2	16.6	16.4	-0.2

NO_2 concentrations shown in bold indicate exceedances of the AQS objective for annual mean NO_2 set at 40 µg/m^3, and underlined figures indicate potential exceedances of the short-term (1-hour) NO_2 objective.

Since developing and modelling this objective Calne has achieved 100% Euro 6 buses. The bus operators change their fleets and timetables so it is not certain that this will be maintained. Wiltshire Council's air quality monitoring data has been put to practical use and been used to support applications for applications for clean buses and clean bus technology. We will continue to work with the Passenger Transport Team and bus providers to support applications for this purpose, as well as promoting use of public transport and working to improve connectivity.

A22 CBA – AQ (1) x Ex (3) x Po (3) - £ (2) = Overall Rating (7)

Further Measures

Further measures for the Calne AQMA have been included within the AQAP, but were not considered for modelling as they are investigative measures:

A23 Support implementation of Calne Transport Strategy (CTS)

A24 Provision of electric vehicle recharging points within the town & Sustainable transport options ((1)

A23 Support implementation of Calne Transport Strategy (CTS)

No plan or strategy stands in isolation, and we seek to ensure common objectives are identified and the AQAP and associated data is used to support kindred projects and initiatives. Calne Area Transport Group (CATG) issues faced by the town. The strategy identifies four key themes which are supportive of improving air quality within the town. These are:

- Improvements to the pedestrian and cycle network
- Highway improvements
- Public Transport network improvements
- Use of smarter travel choices.

We will look to support CTS initiatives that improve air quality.

A23 CBA – AQ (2) x Ex (2) x Po (3) - £ (2) = Overall Rating (10)

A24 Pursue provision of electric vehicle recharging points within the town & sustainable transport options.

It has been a concern of the Calne Air Quality Group that the town lacks infrastructure necessary to facilitate and accommodate electric vehicle charging. This can potentially be addressed in a number of ways, particularly through the Development Control Process. We already ask for provision and S106 funding in response to planning consultations amongst other measures.

A24 CBA – AQ (2) x Ex (2) x Po (3) - £ (2) = Overall Rating (10)

AQAP Measures Table

Table 5-11 – Air Quality Action Plan Options & Measures

Measure No.	AQMA	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	KPI	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
Strategic Measures												
S1	All	Electric Vehicle Charging Infrastructure Strategy	Promoting Low Emission Transport	Procuring alternative refuelling infrastructure to promote Low Emission Vehicles, EV recharging, gas fuel recharging	WC	2020-2022	Ongoing	No. of additional EV charging points installed	Not Modelled – less than 1 µg/m^3	Cabinet meeting on 12th October 2021 to discuss new EV charging infrastructure plan.	Ongoing	Will be used to increase the number of electric vehicles charging points across Wiltshire. Currently 76 EV charging points in council owned car parks. Looking to ensure the right charging points (i.e Fast 7kw AC, Rapid 50kw DC and Ultra Rapid 200kw DC) are installed in the correct locations
S2	All	Local Transport Plans	Framework Policy	Policy & guidance	WC	2022 onward development of LTP4	LTP3 2016-2026 LTP4 2026-2036	See plans for specific KPIs	Not Modelled est 1-5ug/m^3	See plan specific implemenation reports	Ongoing	These are the framework for the strategic policy for growth and development are developed in conjunction wit the core strategy/ the emerging Local Plan
S3	All	Local Cycling & Walking Infrastructure Plans	Promoting Travel Alternatives	Intensive active travel campaign & infrastructure	WC	2022-2023	Plans in development	See plans for specific KPIs	Not Modelled-est 1-5ug/m^3	Public consultation of first plans underway	Ongoing	The LCWIPs will be a long-term commitment beyond the life of the AQAP
S4	All	Bus service Improvement Plan	Promoting Travel Alternatives	Public Transport enhancement	WC	Complete	Ongoing	See plan for specific KPIs	Not Modelled-est 1-5ug/m^3		Ongoing	Wiltshire Council's BSIP seeks to prioritise services at locations which operate through and AQMA in recognition of the need to mitigate poor air quality. As such, the authority will ensure our work to bring zero-emission buses to the county will prioritise routes operating in these areas to maximise the benefits of reduced emissions and improved air quality

Measure No.	AQMA	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	KPI	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
S5	All	Car Clubs & E Bike Hire Schemes	Sustainable transport	Sustainable Transport	WC	2022	Dependant on funding	Implementation of schemes	Not Modelled estimated at 1-5ug/m^3		Beyond life of AQAP	One car club in Salisbury, interest within Devizes in establishing a club.
S6	All	Taxi Low Emission Licensing	Promoting Low Emission Transport	Taxi Licensing conditions	WC	Ongoing	Ongoing	Percentage of fleet at least Euro 6, or hybrid / ULEV	Not Modelled – less than 1 µg/m^3	Discussion held with previous Head of service pre covid	Ongoing	Engage with Taxi Licensing team to encourage uptake of low emission vehicles within the private hire and taxi fleet operating in the county
S7	All	Low Traffic Neighbourhoods (LTNs)	Promoting Travel Alternatives	Intensive active travel campaign & infrastructure	WC	TBC	TBC	No. of LTNs	Not Modelled, impacts unknown	N/a	Unknown	Investigate trials of LTNs in any relevant AQMAs. Dependent on local resident engagement
S8	All	Promoting Active Travel (also cycle/ walking schemes)	Promoting Travel Alternatives	Intensive active travel campaign & infrastructure	WC	Ongoing	Ongoing	Modal Shift	Not Modelled – less than 1 µg/m^3	Various initiatives already underway	Ongoing	Get Wiltshire Walking walks returned from 4 May 2021. Get Wiltshire Walking is a Public Health funded project. Connecting Wiltshire: cycling – provides information on how to get into cycling in Wiltshire.
S9	All	Fleet Recognition Schemes	Vehicle Fleet Efficiency	Fleet efficiency and recognition schemes	WC	2022	2022-2026	Firms signed up to scheme	Not Modelled, impacts estimated for CBA as 1-5ug/m^3	N/a	2028	Investigate the viability of implementing fleet recognition schemes such as EcoStars https://www.ecostars-uk.com/
S10	All	Limit Road Work Hours to Outside of Peak Periods	Traffic Management	UTC, Congestion management, traffic reduction	WC	2022	2022-2026	-	Not Modelled, impacts estimated for CBA as 1-5ug/m^3	N/a	2024	Investigating viability of minor works outside of peak hours only. Should aid congestion, and therefore reduce emissions

Measure No.	AQMA	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	KPI	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
S11	All	Community AQ groups for Area Boards with AQMAs	Policy Guidance and Development Control	Regional Groups Co-ordinating programmes to develop Area wide Strategies to reduce emissions and improve air quality	WC	Ongoing	Ongoing	Activity of Groups	Not Modelled, impacts estimated for CBA as <1ug/m^3	All AQMAs have Area Boards	Ongoing	Variable ongoing activity across groups. Several groups are active, some will need to be revisited.
S12	All	Delivering Air Quality Improvements through the Planning System	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	WC	2009-Present	2022-2026	References in planning application documents	Not modelled, specific to each application est cumulative effect 1-5ug/m^3	Draft produced	2024	Revised Draft SPD will be consulted on alongside the AQAP. New development will be required to adhere to Air Quality Strategy, and Core Policy 55. The ultimate aim is to secure mitigation either directly or if more appropriate, by offsetting via s106 and CIL funding applications.
S13	All	The Green & Blue Infrastructure Strategy into air quality policy, to support core policy 52 of the Wiltshire Core Strategy	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	WC	2021	2022	See Strategy for specific KPIs	Not Modelled, impacts est at <1ug/m^3	Adopted February 2022	Ongoing	See Ref. 16 for further details
S14	All	Wiltshire Climate Strategy into air quality policy	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	WC	2021	2022-27	See Strategy for KPIs	Not Modelled, impact est 1-5ug/m^3	Adopted February 2022	Ongoing	Climate and air quality policies often overlap, so joint consideration will be essential to success in both areas
S15	All	Air Quality Website	Public Information	Via the Internet	WC	Ongoing	Ongoing	Page visits	Not Modelled, impacts unknown est <1ug/m^3	Website active	Ongoing	New website developed to sign post people to the right information and resources to reduce their impact on Air Quality. Wiltshire AQ data published on AQE website.

Measure No.	AQMA	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	KPI	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
S16	All	Environment and Climate Forum	Public Information	Via other mechanisms	WC	Ongoing	Ongoing	Number of Issues Covered by Forum	Not Modelled, impacts unknown est <1ug/m^3	Group to be established shortly	Ongoing	Established primarily in response to climate emergency but can help to cover topics within the AQAP
S17	All	Support air quality events such as Clean Air Day	Public Information	Via other mechanisms	WC	Ongoing	Ongoing	Number of events supported	Not Modelled, impacts unknown est <1ug/m^3	A number of events supported in 2020	Ongoing	Intention to support any events related to air quality promotion in the county
S18	All	Promotion & Support of No Idling Schemes	Public Information	Via other mechanisms	WC	2022-2026	Life of the AQAP	No of schemes	Not Modelled, impact est <1ug/m^3	-	Ongoing	PPS service commitment to Climate Change programme
S19	The UK100	Promoting Climate change & Air Quality good practice across local authorities/ partnership working	Partnership working	Via other mechanisms	WC/Partners	Ongoing	Ongoing	-	Not modelled	-	Ongoing	https://www.uk100.org/
S20	All	Combustion Control and Regulation	Promoting Low Emission Plant	Regulations for fuel quality for low emission fuels for stationary and mobile sources	WC	Ongoing	Ongoing	Number of smoke control complaints	Not Modelled, impacts unknown	Not generally an issue to date	Ongoing work for the Council	Whilst there are currently no smoke control areas, these can be implemented where needed. The Council has powers it can exercise against people causing a statutory nuisance and nvestigates allegations of nuisance made. Also plan to implement Eco-design 2022 regulations for small wood burning stoves, which are increasing in popularity
AQMA Specific Measures												
A1	Salisbury (City Centre)	Improvements to active travel routes in the city centre	Traffic Management	UTC, Congestion management, traffic reduction	WC	2022	2022-2026	Implementation	Potential reductions of up to 1.0 µg/m^3 with a similar scheme	Scheme removed due to concern of impact on businesses	TBC	People Friendly Streets was implemented for a brief period in 2020 but discontinued. Behavioural change was achieved. investigate options for revised measures

Measure No.	AQMA	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	KPI	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
A2	Salisbury (City Centre)	Improving Rail station connectivity with city centre	Traffic Management	UTC, Congestion management, traffic reduction	WC	2021-2022	2022-2023	Parking controls at station	To be populated when detailed plans are available	Planning phase at present	2024-2025	implementation of rail station forecourt scheme including EV charging and relocation of car parking in order to encourage modal shift in order to encourage modal and improve fleet emissions
A3	Salisbury (A36 Wilton Road)	Improvements to junction near Wilton, Harnham gyratory and Exeter Street roundabout.	Traffic Management	UTC, Congestion management, traffic reduction	WC	2021-2022	2022-2023	Junction idling times	Up to 0.3 µg/m^3	Planning phase at present	2025	The junctions near Wilton have been identified as having congestion issues that has triggered air quality issues in the area. Potential improvements at these junctions are aimed at easing congestion and improving traffic flow in the Salisbury AQMAs.
A4	Salisbury (A36 Wilton Road)	MOVA upgrade on A36 roundabout traffic lights along Churchill Way.	Traffic Management	UTC, Congestion management, traffic reduction	WC	2022	2022-2023	Junction idling times	Up to 0.2 µg/m^3	Planning phase at present	2025	Improving traffic flows and emissions through MOVA technology
A5	Salisbury (All)	Improvement to A36 Trunk Road through Salisbury	Traffic Management	Strategic highway improvements, Reprioritising road space away from cars, inc Access management, Selective vehicle priority, bus priority, high vehicle occupancy lane	WC, HA	2018 - Present	Post 2022	Project status	Not modelled, would require detailed consideration / options appraisal. Would likely achieve 'Medium' to 'High' improvements though	-	-Unknown	Will be the subject of continuing discussions between Wiltshire Council and National Highways.

Measure No.	AQMA	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	KPI	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
A6	Salisbury (All)	Targeting Ind. Estate LGVs	Promoting Low Emission Transport	Company Vehicle Procurement - Prioritising uptake of low emission vehicles	WC	2022-2023	Post 2022	-	Unknown, not modelled. Likely to be minimal impacts.	Being considered for feasibility	Post 2024	LGV emissions from the Industrial Estate are known to largely contribute to exceedances on Southwestern Road. The feasibility of wider re-development of the industrial estate will be explored, as will the creation of preferential routes for LGVs
A7	Salisbury (All)	Salisbury Park and Ride	Transport Planning and Infrastructure	Other	WC	Complete	Ongoing	Park and Ride Usage	Not modelled, current measure	Implemented	Ongoing	Measures to encourage better use of Park & Ride to be explored including improved bus priority along the A345
A8	Salisbury (All)	Salisbury Transport & Parking measures as set out in Parking Implementation Plan	Traffic Management	Parking measures	WC	2018-Present	Ongoing	Publication / updates of strategies	Not modelled, current measure	-	Ongoing	Transport and Parking strategies specific to Salisbury will help to improve air quality in the city.
A9	Bradford-on-Avon	Re-introduction of one-way system.	Traffic Management	UTC, Congestion management, traffic reduction	WC	2021	2022-2023	One-way system implementation date	See Table 5-5	Previously imposed, so known to be effective	2024-2025	Diverting traffic away from Market Street and Mason's Lane aiming to reduce concentrations in AQMA. Previously enforced through Experimental Traffic Regulation Order
A10	Bradford-on-Avon	Stricter weight limits restriction on Town Bridge	Traffic Management	Emission based parking or permit charges	WC	2021	2022-2023	Weight Limit Implementation Date	Up to 0.9 µg/m^3	N/a	2024	Heavier vehicles are bigger emitters, so by potentially removing these from the AQMA will reduce NO_2 concentrations
A11	Bradford-on-Avon	Tree crown reduction on Masons Lane	Policy Guidance and Development Control	Other Policy	WC	2021	2022-2023	Foliage Coverage	Up to 13.6 µg/m^3 along Manson's Lane only (assuming canyon effect removed)	N/a	2024-2025	Foliage on western side of Mason's Lane creates canyon effect combined with buildings on opposite side. Cutting this back would aid dispersion

Measure No.	AQMA	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	KPI	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
A12	Westbury	Junction optimisation at A350/Bratton Rd (B3098) and A350/ Station Rd (B3097)	Traffic Management	UTC, Congestion management, traffic reduction	WC	2021	2022-2023	Idling time at roundabouts	Up to 1.2 µg/m^3	Planning phase at present	Ongoing	The aim is to reduce idling time by improving congestion, and therefore reduce emissions
A13	Westbury	Improvements to the A350 through Westbury	Traffic management	Traffic management	WC	-	-	Implementation of highway improvements	Estimated as med- High	Improvement being made to A350 from north to South.	Ongoing	Improvements are being implemented progressively to the A350 from north to south. Proposals for Chippenham and Melksham are in development
A14	Westbury	Peak hour re-routing of traffic	Traffic Management	UTC, Congestion management, traffic reduction	WC	2021 - 2022	2022-2023	Traffic flow through key junctions in peak hours	Not modelled, at early stages of consideration	N/a	Ongoing	Investigating with Transport team viability of alternative routes to the AQMA during morning and evening peaks
A15	Westbury, Marlborough	Sustainable Last Mile Deliveries	Freight and Delivery Management	Delivery and Service plans	WC	2021	2022-2023	Number of deliveries made by renewable means	Not Modelled, impacts unknown	N/a	Unknown	Investigate the viability of incentivising sustainable modes of last mile delivery, such as the e-cargo bikes trialled in London, given LGVs are dominant contributor sources in both these AQMAs
A16	Marlborough	Facilitate a shift from diesel to electric vehicles	Infrastructure/ Traffic Management	UTC, Congestion management, traffic reduction	WC	2021	2022-2024	Queue time at junctions	No Modelled	N/a	2025	Facilitate shift to low emission vehicles & reduce congestion,
A17	Marlborough	Improve connectivity within the Marlborough area	Public transport	Public transport	WC			Provision of improved public transport	Not modelled est at <1ug/m^3	-	-	Support Passenger Transport Team through bids for funding.
A18	Devizes	Traffic improvements around Shanes Castle/Wadworth junction	Traffic Management	UTC, Congestion management, traffic reduction	WC	2021	2022-2023	Queue time at junctions	Up to 1.8 µg/m^3	N/a	2024	Should aid congestion, and therefore reduce emissions
A19	Devizes	Devizes Transport Strategy	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	WC	2016	Ongoing	-	Not Modelled, impacts unknown	A plan has been in place since 2016	Ongoing	Continue to implement, and possibly refresh, plan to target pollution hotspots

Measure No.	AQMA	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	KPI	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
A20	Devizes	Devizes Canal Towpath Cycle route	Transport Planning and Infrastructure	Cycle network	WC	2019 - 2021	Ongoing	Number of cyclists using route	Not Modelled, impacts unknown	Provision of cycle way along canal towpath	Ongoing	Works in progress. Tow Path – 4 out 5 phases complete. No funding for phase 5 identified at this stage. Works ongoing
A21	Calne	Re-routing traffic via high street	Traffic Management	UTC, Congestion management, traffic reduction	WC	2021	2022-2023	Implementation of re-routing	Up to 0.2 µg/m^3	N/a	2024-2025	Opening up another through route should ease congestion at junctions
A22	Calne	Upgrade of buses from Euro IV to Euro VI	Vehicle Fleet Efficiency	Other	WC	2021	2022-2023	Percentage of fleet Euro VI	Up to 0.4 µg/m^3	90% of journeys currently Euro VI	2023 and Ongoing	Improvement has been achieved but further work required.
A23	Calne	Support Implementation of Calne Transport Strategy	Policy, Public transport enhancement, active travel	Policy, Public transport enhancement, active travel	WC	2021	Ongoing	See plan for specific KPIs	Not Modelled. Est 1-5ug/m^3		Beyond life of AQAP	Calne Transport Strategy
A24	Calne	Pursue provision of electric vehicle recharging points within the town & sustainable transport options	Transport Planning & Infrastructure	Facilitating shift to ULEV/ Re-prioritising road space away from cars	WC	2023	2023-2026	Charging point provision/ sustainable transport options available.	Not Modelled – Likely to be 1-5 µg/m^3 at hyper local scale		2026	Addresses concerns made by Calne Air Quality Group regarding provision of charging points and desire to increase sustainable transport options.

Appendix A: Response to Consultation

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

Consultee	Category	Response
Highway Operations (includes; Passenger Transport Team, Fleet Services, Street scene, & Parking Services)	Internal	Commentary provided by Passenger Services team on bus services and potential for upgrading to cleaner emissions. Further information sought from the team on wording and nature of bus related objectives with respect to Marlborough & Calne
Sustainable Transport Team	Internal	Detailed commentary provided with respect to measures and adopted policy within the team's remit. Measures updated and modified in line with most comments. Further information sought from the team.
Public Health Wiltshire	Internal	Typos and one query as to whether the plan referred only to nitrogen dioxide- yes, the plan is to address exceedances of the annual mean objective in relation to all 8 AQMAs.
Facilities Management	Internal	No comments
Waste Management	Internal	No Comments
Strategic Planning Team	Internal	No Comments
Development Services	Internal	No Comments
Climate Change	Internal	Comments provided, closer ties on delivering joint goals to be developed

Economy & Regeneration	Internal	No Comments
Partnership & Engagement Team (Community Area Boards)	Internal	No Comments
Natural & Historic Environment Team	Internal	No Comments
Legal Services	Internal	No Comments

Table A.2 – Summary of Responses to Public Consultation grouped into categories of most frequently asked questions/concerns.

Public comment	Response
There is little in the way of actual plans and no objectives or action plans that have time delivery that can be monitored and assessed.	We consider that the measures include those set out in table 5-11 represent the outcome of a prolonged period of consultation with key partners to determine their viability. Further details of this process can be found in the section titled 'Development and Implementation'.

The action plan does not consider fine particulates (PM2.5)	PM2.5 is not included within the LAQM framework and there is no duty to monitor in the same way as is required for other pollutants such as nitrogen dioxide and PM10. The action plan is required by the Environment Act to Address breaches of the UK air quality annual mean objective in eight locations in Wiltshire. Boarder objectives are detailed in the Air Quality Strategy for Wiltshire which we plan to review & will include issues such as PM2.5. Although Pm2.5 concentration are mainly influenced by transboundary sources the council can help to reduce levels within it's control. Examples of this action are inspecting industrial installations via the LAPPC to ensure levels of VOCs meet permit requirements and taking action via Environmental Protection Act 1990 provisions where bonfires are found to be causing a statutory nuisance.
The monitoring of air quality is not comprehensive enough meaning pollution ‘hotspots’ are missed. There needs to be more monitoring.	In total we have around 70 monitoring sites spread across Wiltshire comprising a mix of passive diffusion tubes and automatic analysers. The air pollution levels reported are sourced from a combination of our annual status report and ADMS modelling software. The ASR can be downloaded here https://www.wiltshire.gov.uk/article/6472/Air-quality-annual-reports.
There is a lack of detail on how the air quality ADMS modelling works	The AQAP refers to the technical aspects of the ADMS modeling software on page 40 via Reference 32 http://www.cerc.co.uk/environmental-software/ADMS-Roads-model.htm

There should be no idling signage setup in each AQMA and fines handed out to repeat offenders who leave engines idling	THE DFT have advised us on the following in relation to engine idling: 1) Under Regulation 98 of the Road Vehicles (Construction and Use) Regulations 1986, it is an offence to cause emissions or noise by leaving engines running unnecessarily whilst a vehicle is stationary. These requirements apply when a vehicle is parked at the roadside. Enforcement is carried out by the police. Also, under the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002, local authorities may issue fixed penalty notices for this offence. 2) 'Switch off engine' signs require DfT authorisation. However, there are strict guidelines on the number, location etc. for authorisation of these signs. These signs are not intended for general use. Applications will only be considered on a site specific basis where there is evidence that engines are habitually left running. We are exploring the option of no idling schemes with colleagues in our highways team. We will be exploring schemes targeted at sites and times where unnecessarily idling is known to be a particular problem such as schools at the start and end of

	the school day, or around areas which are particularly vulnerable to poor air quality.
There needs to be a bypass for Westbury and Salisbury to achieve significant air quality improvements to these towns.	The original AQAP focused on a proposed A350 bypass for Westbury. The cancellation of the bypass in 2009 forced a shift in action planning toward other measures such as promoting cycling and walking within Westbury. It is recognised that there is a historic and ongoing desire for a Salisbury bypass. The Council supports the principle of a bypass for Salisbury but the strategic need for it will be understood through the Department for Transport / National Highways M4 to Dorset Coast RIS2 (Road Investment Strategy) study 2020-2025. If identified as a need and a priority, the scheme would be progressed through a subsequent round(s) of the RIS and / or through the DfT's Major Road Network / Large Local Majors process and the Western Gateway Sub-national Transport Body. This is unlikely to deliver any improvements in the short to medium term and costs would be well in excess of £100 million.
The council should adopt a ULEZ or clean air zone scheme similar to Bath or Bristol to charge polluting vehicles	The UK Supreme Court ordered the government in 2015 to produce new air quality plans to bring air pollution down to legal levels in the "shortest possible time". Since 2017, the Government has used its powers under the Environment Act 1995 to 'direct' 64 local authorities to produce clean air plans. Clean air zones are often the most effective way to deliver compliance, in the shortest possible

	time and government funding has been granted to each of the 64 directed local authorities to assist with the setup of these types of schemes. Wiltshire Council was not one of these 64 councils directed by the government to produce clear air plans and therefore plans to seek compliance with legal emissions targets through this updated air quality action plan.
Why is the Westbury incinerator being allowed so close to the Westbury AQMA?	The incinerator planning application was refused by the council; however, this decision was subsequently approved by the planning inspector following an appeal. However, the poor air quality in Westbury is wholly caused by slow moving traffic (in particular diesel cars) along the A350 between Warminster Road and Haynes Road.
Large scale housebuilding should not be allowed close to AQMAs	A new SPD has been developed alongside this action plan for consultation and adoption by the council. The new SPD compliments core policy 55 of the Core Strategy, establishing a risk rating procedure for proposed sites on the basis of their impact on air quality (including proximity to existing AQMAs) and requires good design along with measures to mitigate/offset impacts of proposals. Provision is made to request financial contributions to assist in the delivery of measures contained within this action plan. This is a new area of work for the council and one we hope help ensure that developments must take into their impact on AQMAs.

The AQAP report is too long and difficult to read	Unfortunately, we are unable to change the format of the report as it is a requirement of Defra to structure the report in this way. However, recognising this we have also published a plain English non-technical summary document which can be downloaded on our air quality pages https://www.wiltshire.gov.uk/air-quality-reports
The pollution limits for nitrogen dioxide are too low at 40 ug/m3. The limits should be redrawn to require levels to be below the latest WHO standards of 10ug/m3.	The Environment Act 1995 (as amended in 2021) and the associated Air Quality (England) Regulations 2000 set the UK framework for local authorities in England. The Regulations specify that the UK air quality annual mean objective for Nitrogen Dioxide is 40 ug/m3.
The air quality measures don't go far enough.	We consider that the measures include those set out in table 5-11 represent the outcome of a prolonged period of consultation with key partners to determine their viability. Further details of this process can be found in the section titled 'Development and Implementation'.
The air quality measures won't work as predicted	The modelled measures have been subject to detailed ADMS Roads dispersion modelling which is the gold standard for air quality predictions. Many of these measures would be subject to detailed feasibility plans prior to their implementation and so the exact detail may change following this.

The proposed one way system at BoA will cause air quality to worsen on new road and Springfield	Monitoring of the areas highlighted took place when the social distancing one way system was in place in 2020/2021 and nitrogen dioxide levels were found to be significantly below the annual objective. The re-implementation of a similar traffic scheme to that of the social distancing scheme would assist in achieving the Bradford-on-Avon air quality objective in a shorter timeframe.
Car parking charges across council owned car parks should be based on vehicle emissions with the most polluting vehicles paying more.	Car parking charges based on emissions was explored at shortlisting stage however this option was ruled out as it was not sufficiently compatible with the policies of the parking service team.
HGVs are more polluting than cars so why do you claim that diesel cars are the most polluting?	The data on traffic emissions for vehicle was obtained using Department for Transport traffic counts, Wiltshire Council's own traffic counts and the source apportionment and emissions factor toolkit methodology https://laqm.defra.gov.uk/wp-content/uploads/2021/11/EFTv11.0-user-guide-v1.0.pdf On a vehicle-by-vehicle basis it is correct that emissions from HGVs are greater than diesel cars. However, the traffic counts confirm that there are significantly more diesel cars on the road than HGVs, and therefore as a collective, diesel cars are significantly more polluting.

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)
Low Traffic Neighbourhoods within AQMAs	% car use reduction and/or diversionary re-routing	After consultation with transport colleagues, it was decided that there was not enough evidence that these measures would deliver the necessary air quality improvements to the A350.
Peak hr re-routing in Westbury	Moving peak hr traffic to different links	The risks of causing congestion at other locations as there are limited options for alternative routes in Westbury.
EV parking incentives in Westbury, Marlborough, Salisbury, Devizes	Incentivise lower emission vehicle adoption by having cheaper parking charges for these vehicles	Car parking charges based on emissions was explored at shortlisting stage however this option was ruled out as it was not sufficiently compatible with the current policies of the parking service team. There was also a concern that those on lower incomes who could not afford an electric vehicle would be disproportionately penalised.
Ped Crossing on Herd Street, Marlborough	Relocate pedestrian crossing to improve traffic flow	After consultation with highways we decided that the pedestrian safety benefits far outweighed the small improvement in air quality benefit.
Bus upgrade in Marlborough to all with euro 6 engines or above	Remove more polluting euro 4 engines from bus network	After consultation with public transport, we discovered that all buses going through Marlborough have euro 6 engines.
Investigate ownership of Calne Woodlands Social club	If the façade could be removed would benefit dispersion and reduce build up of pollutants	The council has no control over this parcel of land and the legal implications were considered too great to see the measure as viable option.

Appendix C: Source Apportionment Breakdown

Source apportionment has been provided for:

- The total nitrogen dioxide concentrations at the monitoring location with the highest nitrogen dioxide concentration in 2019 in each AQMA; and
- Road NOx component, using finer resolution of fleet breakdown data at Council traffic count sites.

Salisbury

Figure C. 1: Salisbury AQMAs NO_2 Source Apportionment at Highest Monitored Concentration

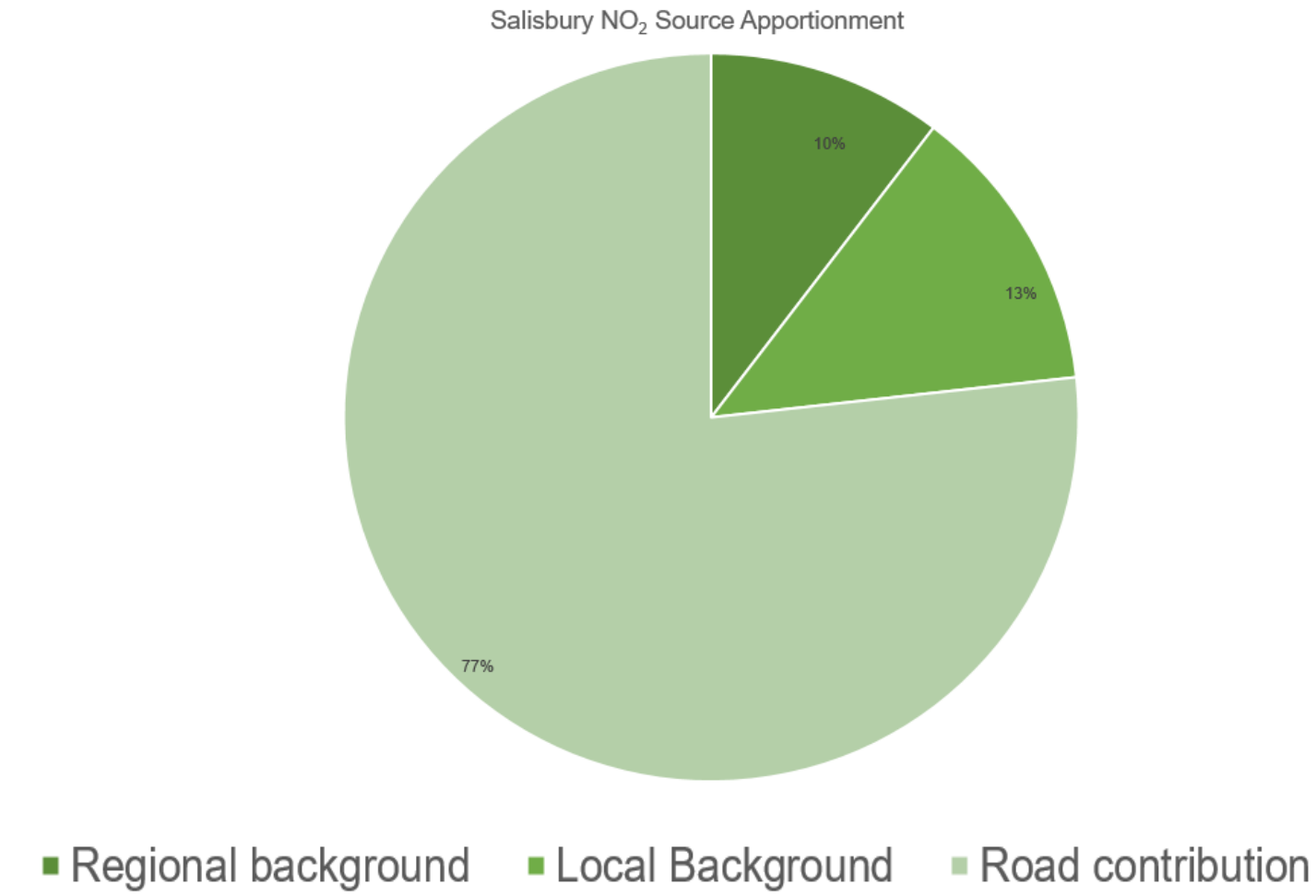
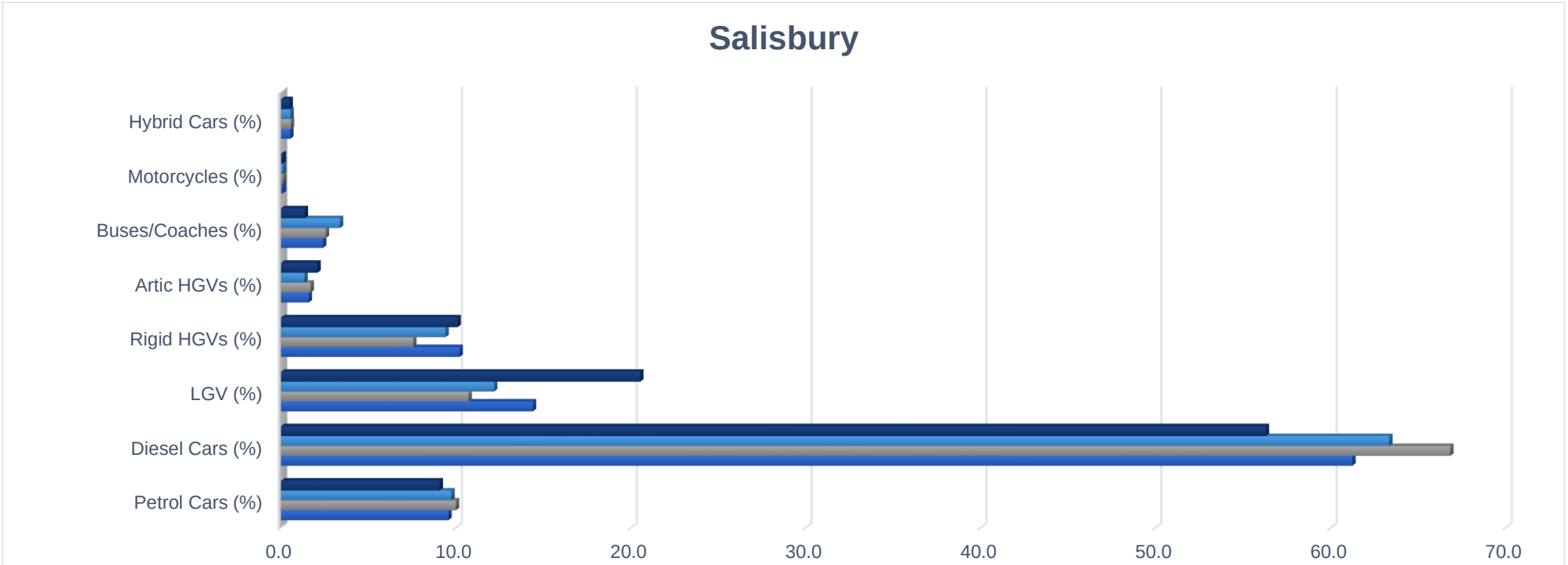


Figure C. 2: Salisbury AQMAs Road NOx Source Apportionment



	Petrol Cars (%)	Diesel Cars (%)	LGV (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Motorcycles (%)	Hybrid Cars (%)
NE Salisbury A30	9.1	56.3	20.5	10.1	2.1	1.4	0.1	0.5
N Salisbury Castle St	9.7	63.3	12.2	9.4	1.3	3.4	0.1	0.5
NW Salisbury Fisherton St	10.0	66.8	10.7	7.6	1.7	2.6	0.1	0.6
S Salisbury Exeter St	9.6	61.2	14.4	10.2	1.6	2.4	0.1	0.5

Bradford-on-Avon:

Figure C. 3: Bradford-on-Avon AQMA NO_2 Source Apportionment at Highest Monitored Concentration

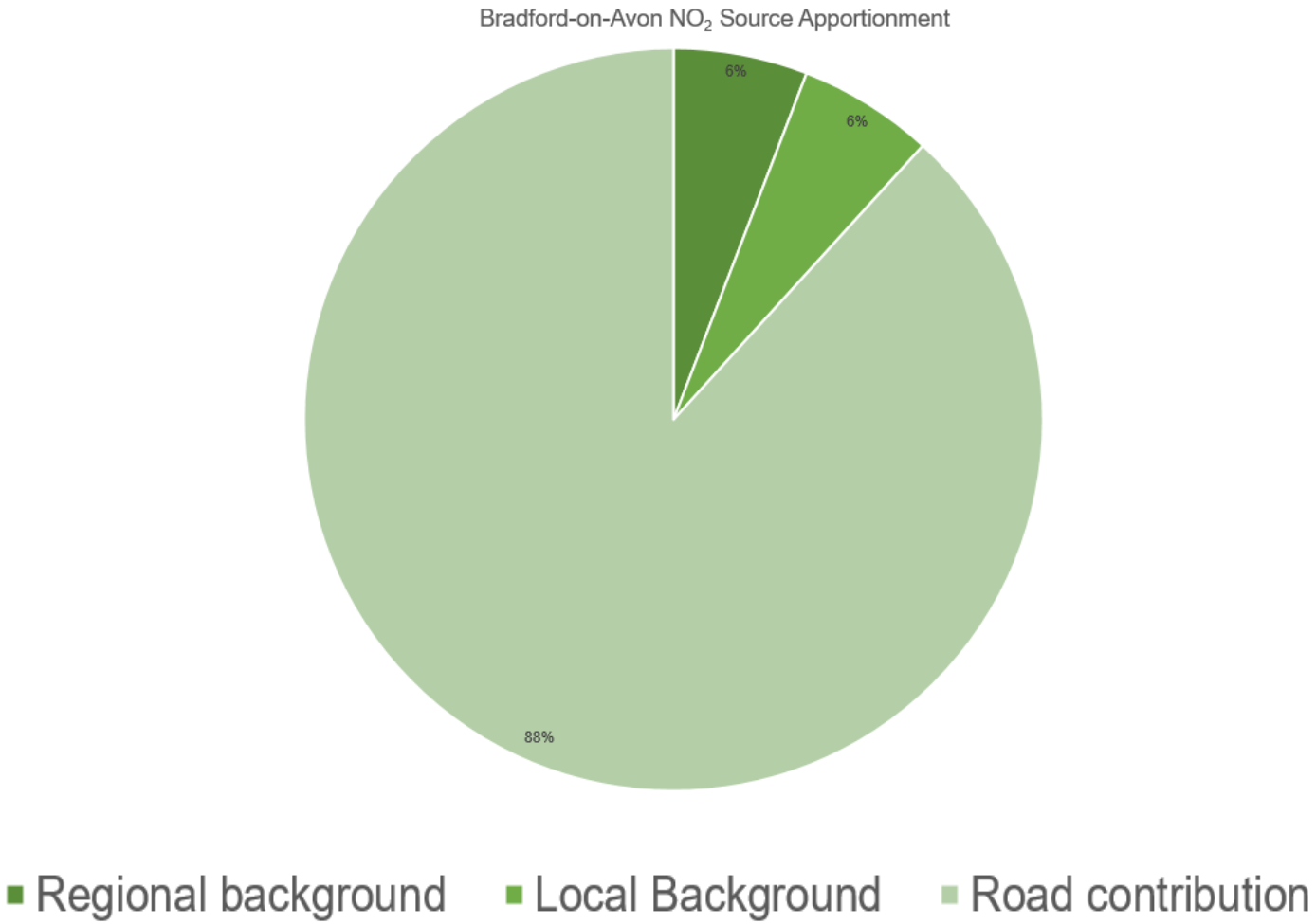
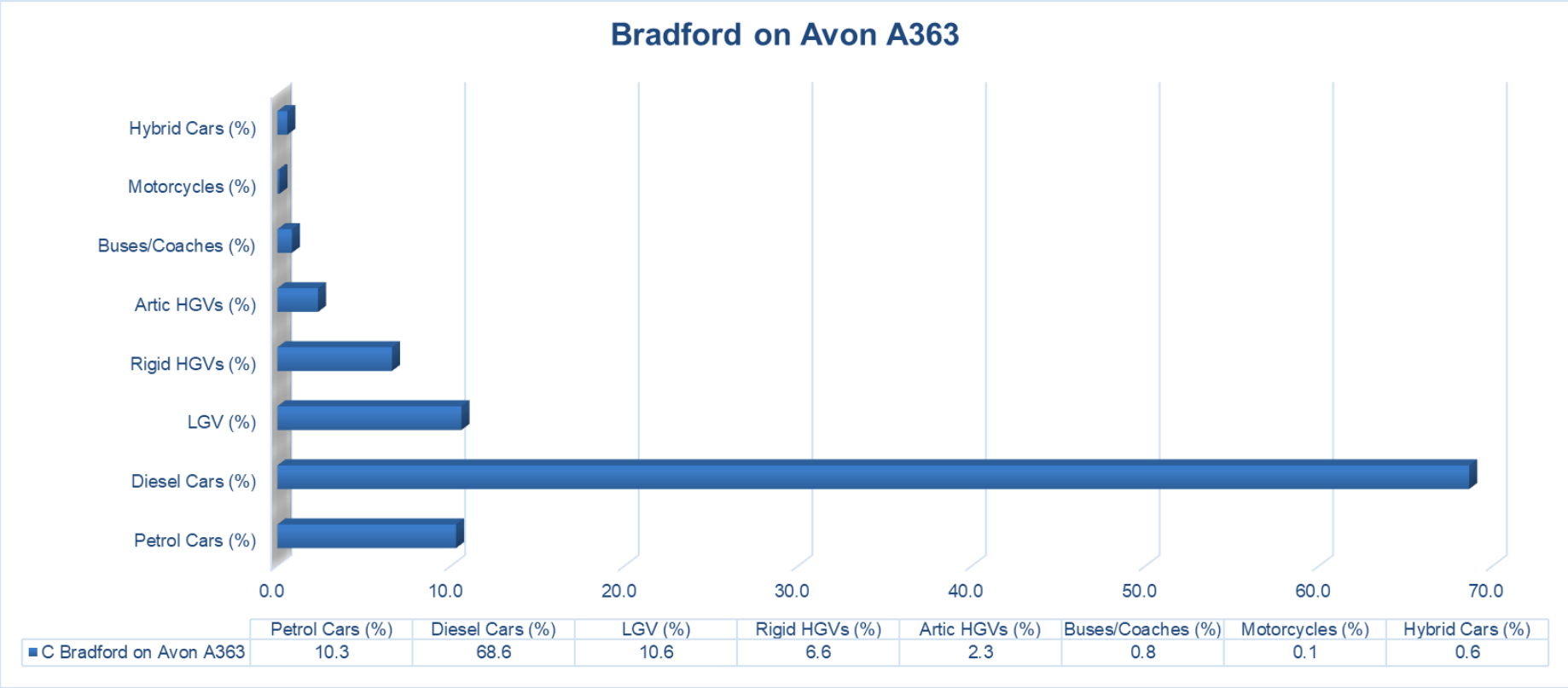


Figure C. 4: Bradford-on-Avon AQMA Road NOx Source Apportionment



	Petrol Cars (%)	Diesel Cars (%)	LGV (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Motorcycles (%)	Hybrid Cars (%)
C Bradford on Avon A363	10.3	68.6	10.6	6.6	2.3	0.8	0.1	0.6

Westbury

Figure C. 5: Westbury AQMA NO_2 Source Apportionment at Highest Monitored Concentration

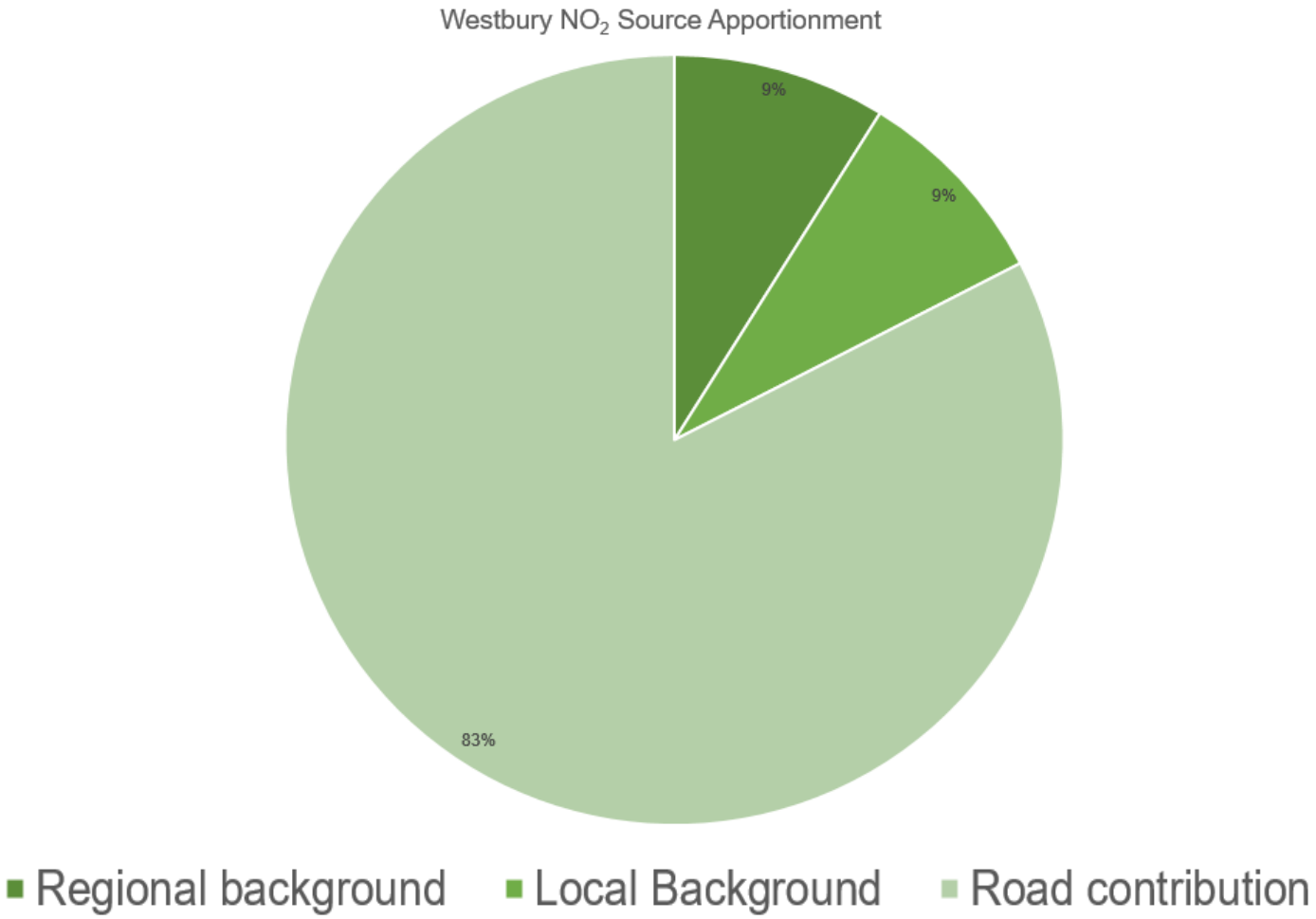
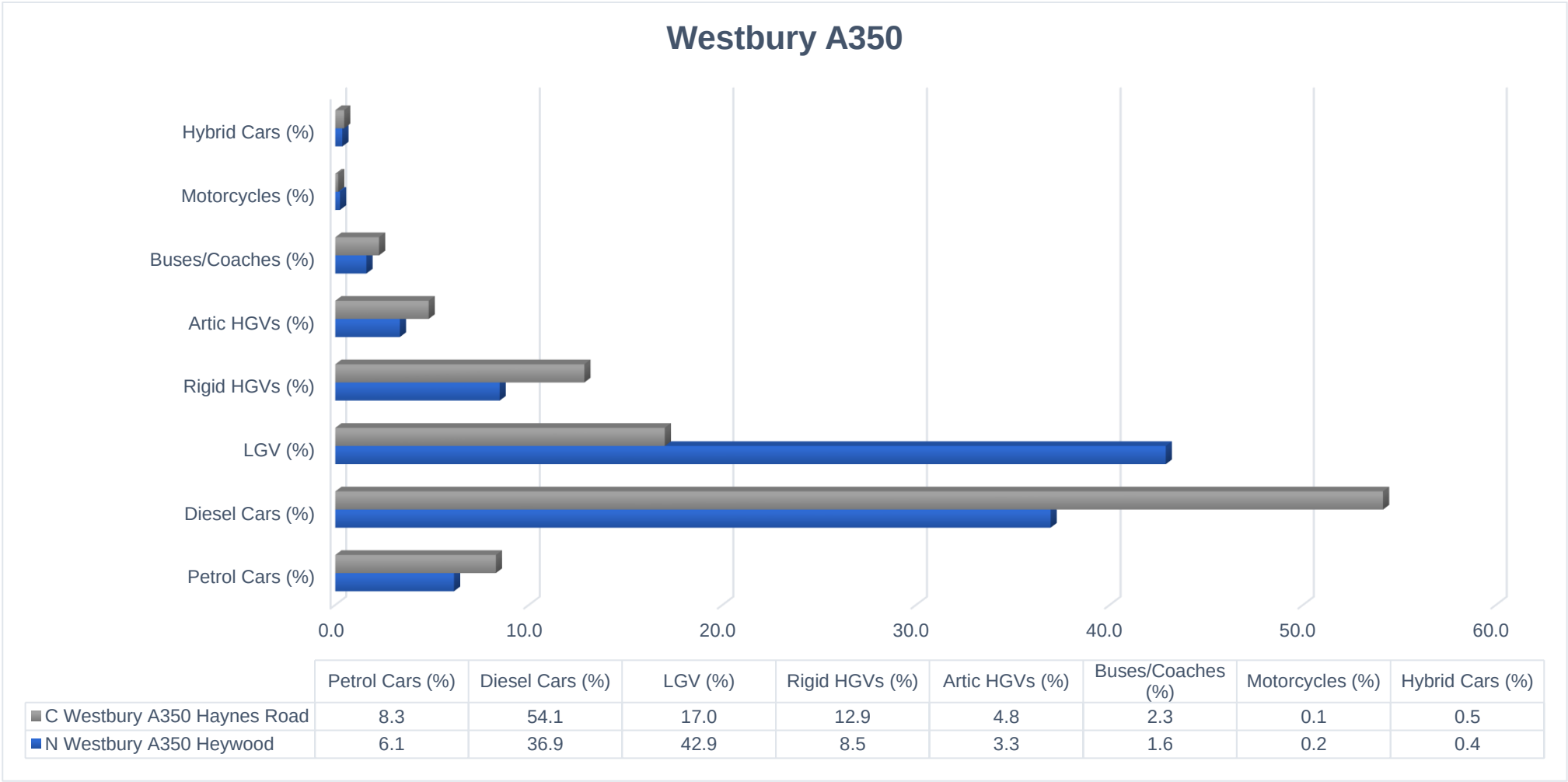


Figure C. 6: Westbury AQMA Road NOx Source Apportionment



	Petrol Cars (%)	Diesel Cars (%)	LGV (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Motorcycles (%)	Hybrid Cars (%)
C Westbury A350 Haynes Road	8.3	54.1	17.0	12.9	4.8	2.3	0.1	0.5
N Westbury A350 Heywood	6.1	36.9	42.9	8.5	3.3	1.6	0.2	0.4

Marlborough

Figure C. 7: Marlborough AQMA NO_2 Source Apportionment at Highest Monitored Concentration

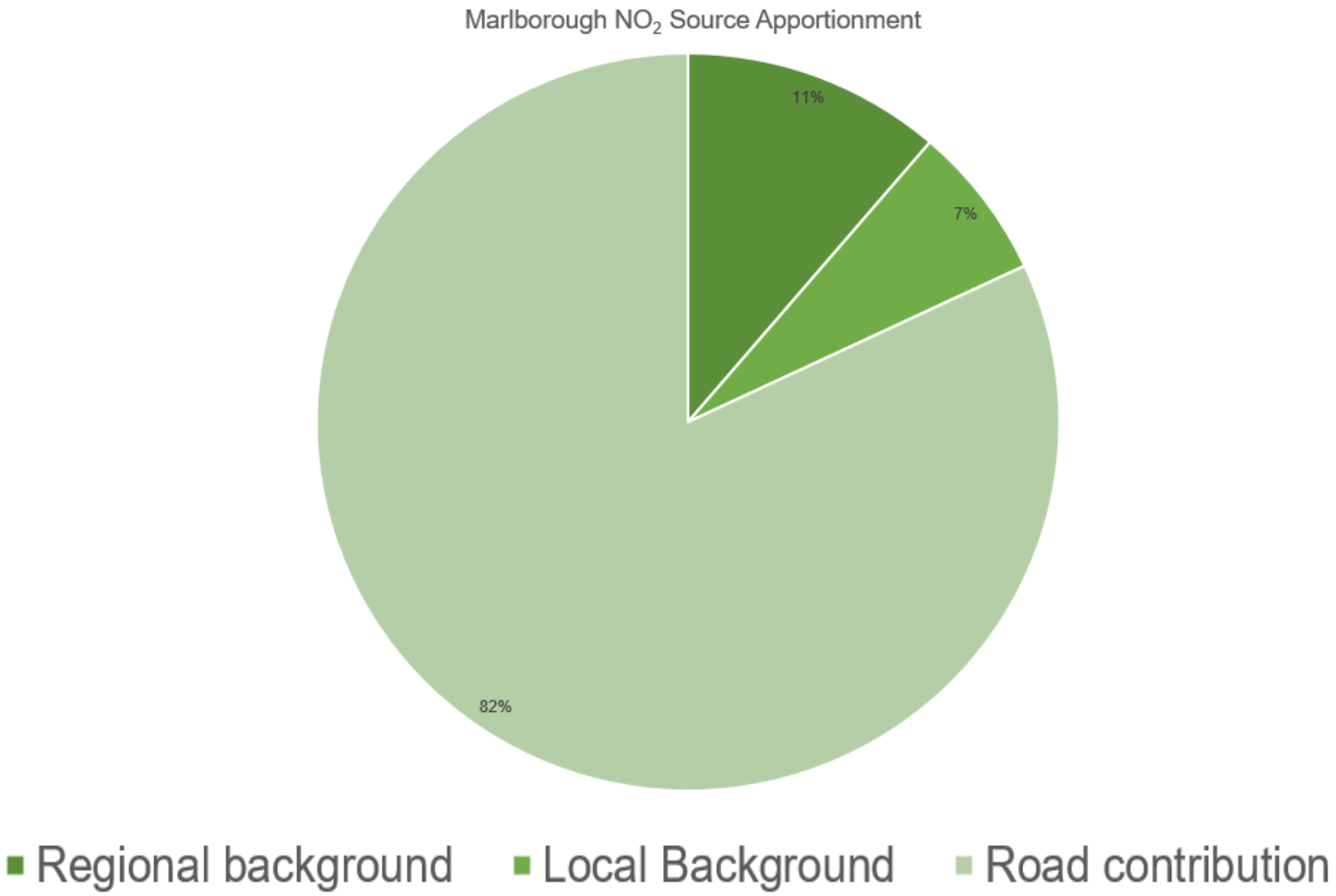
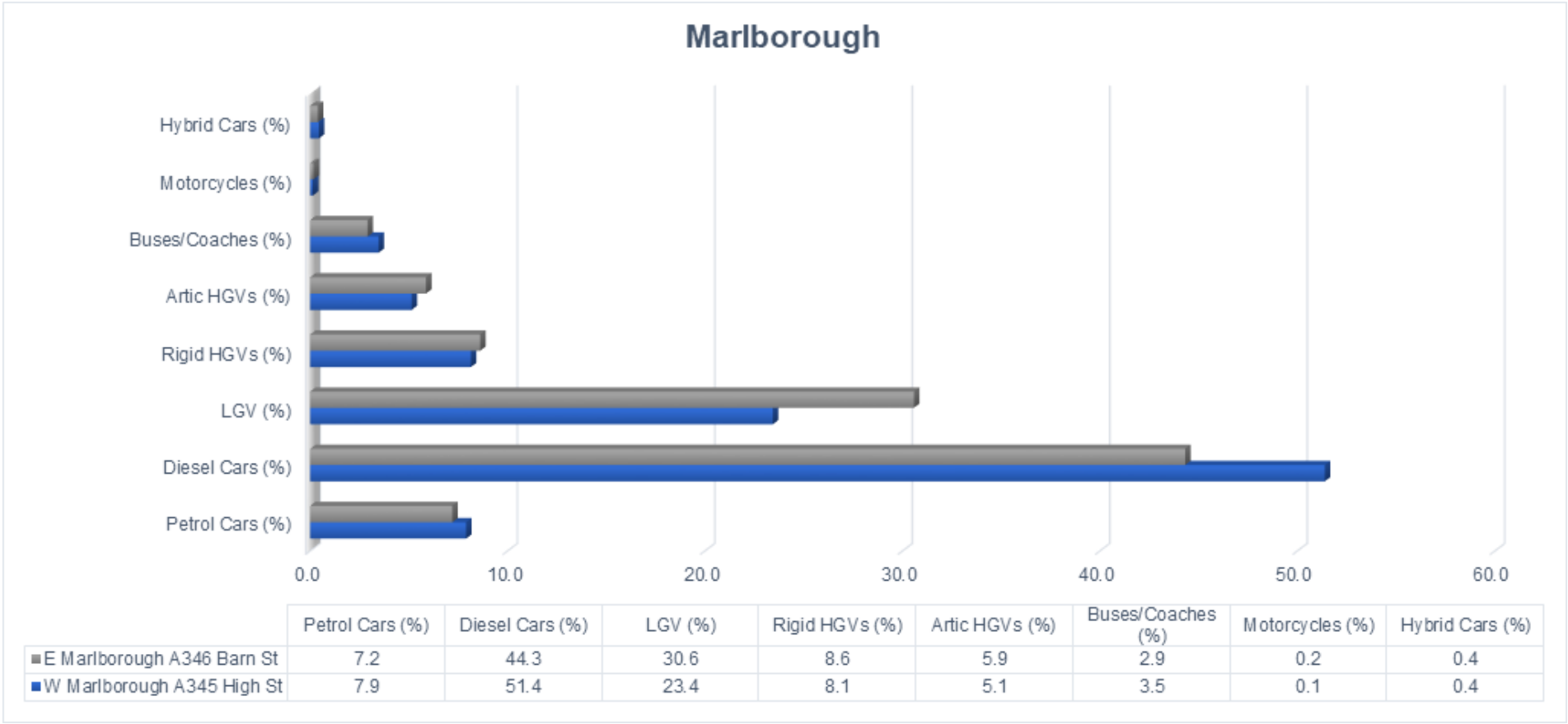


Figure C. 8: Marlborough AQMA Road NOx Source Apportionment- remove the Westbury text from key



	Petrol Cars (%)	Diesel Cars (%)	LGV (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Motorcycles (%)	Hybrid Cars (%)
E Marlborough A346 Barn St	7.2	44.3	30.6	8.6	5.9	2.9	0.2	0.4
W Marlborough A345 High St	7.9	51.4	23.4	8.1	5.1	3.5	0.1	0.4

Devizes

Figure C. 9: Devizes AQMA NO_2 Source Apportionment at Highest Monitored Concentration

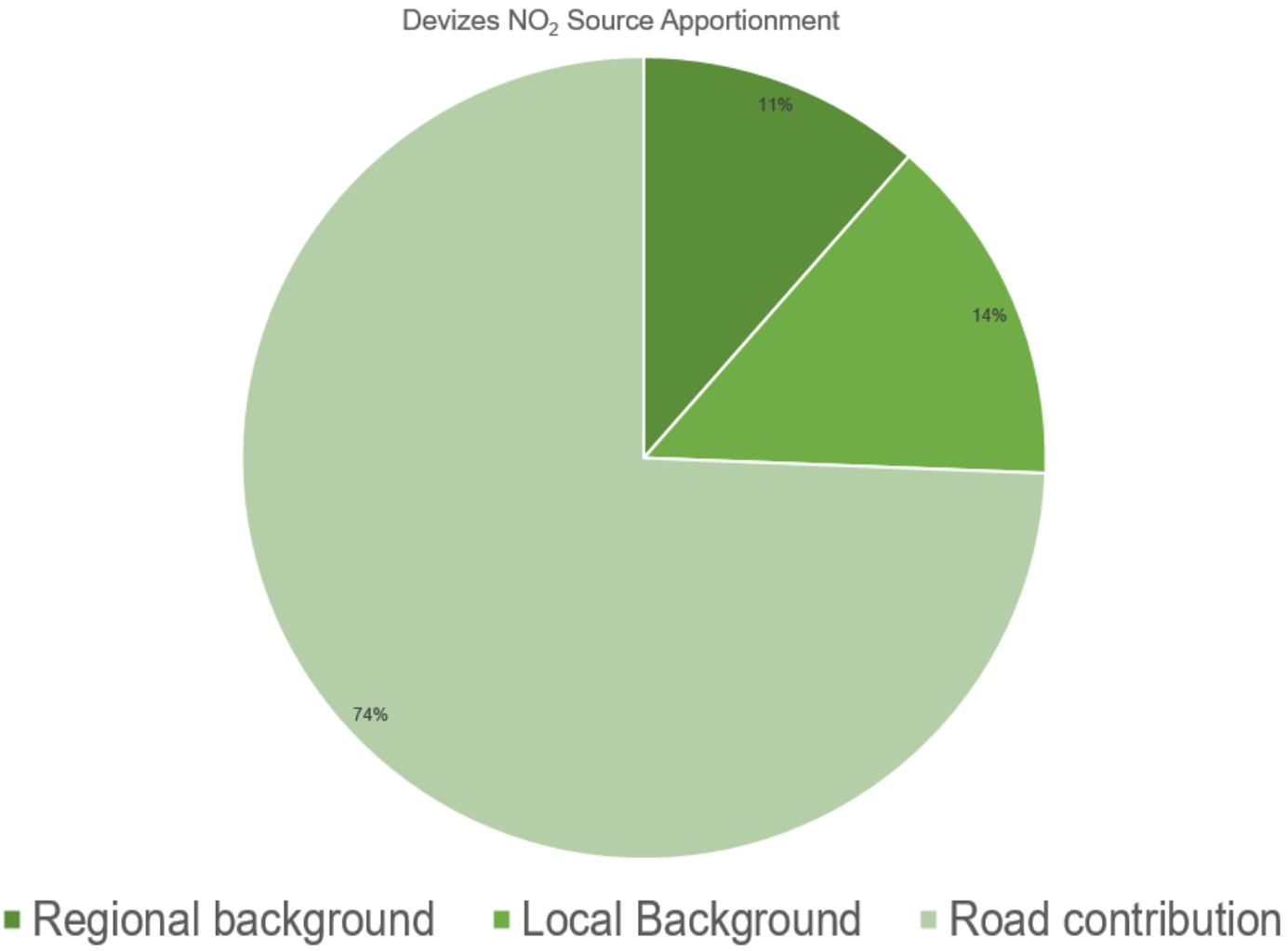
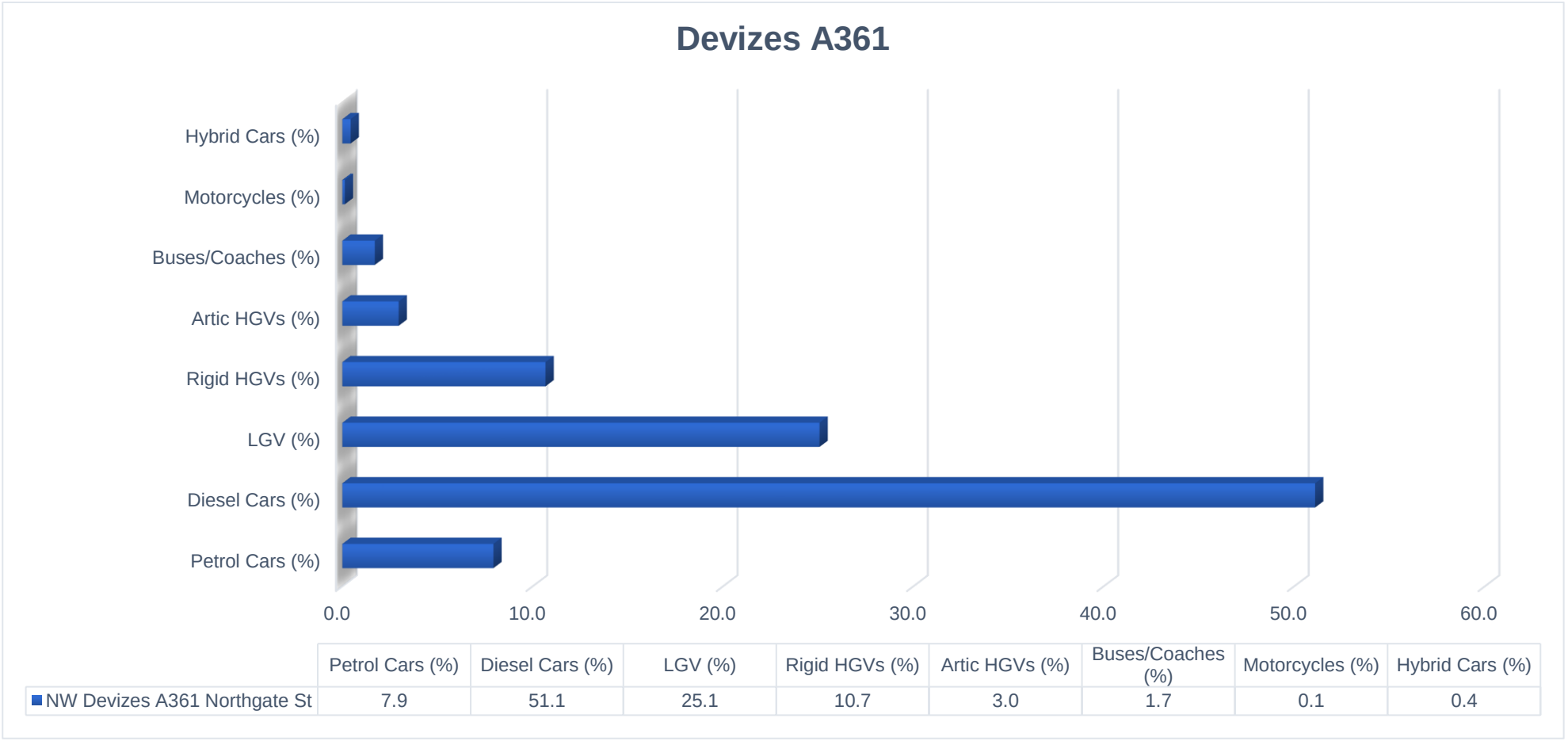


Figure C. 10: Devizes AQMA Road NOx Source Apportionment



	Petrol Cars (%)	Diesel Cars (%)	LGV (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Motorcycles (%)	Hybrid Cars (%)
NW Devizes A361 Northgate St	7.9	51.1	25.1	10.7	3.0	1.7	0.1	0.4

Calne

Figure C. 11: Calne AQMA NO_2 Source Apportionment at Highest Monitored Concentration

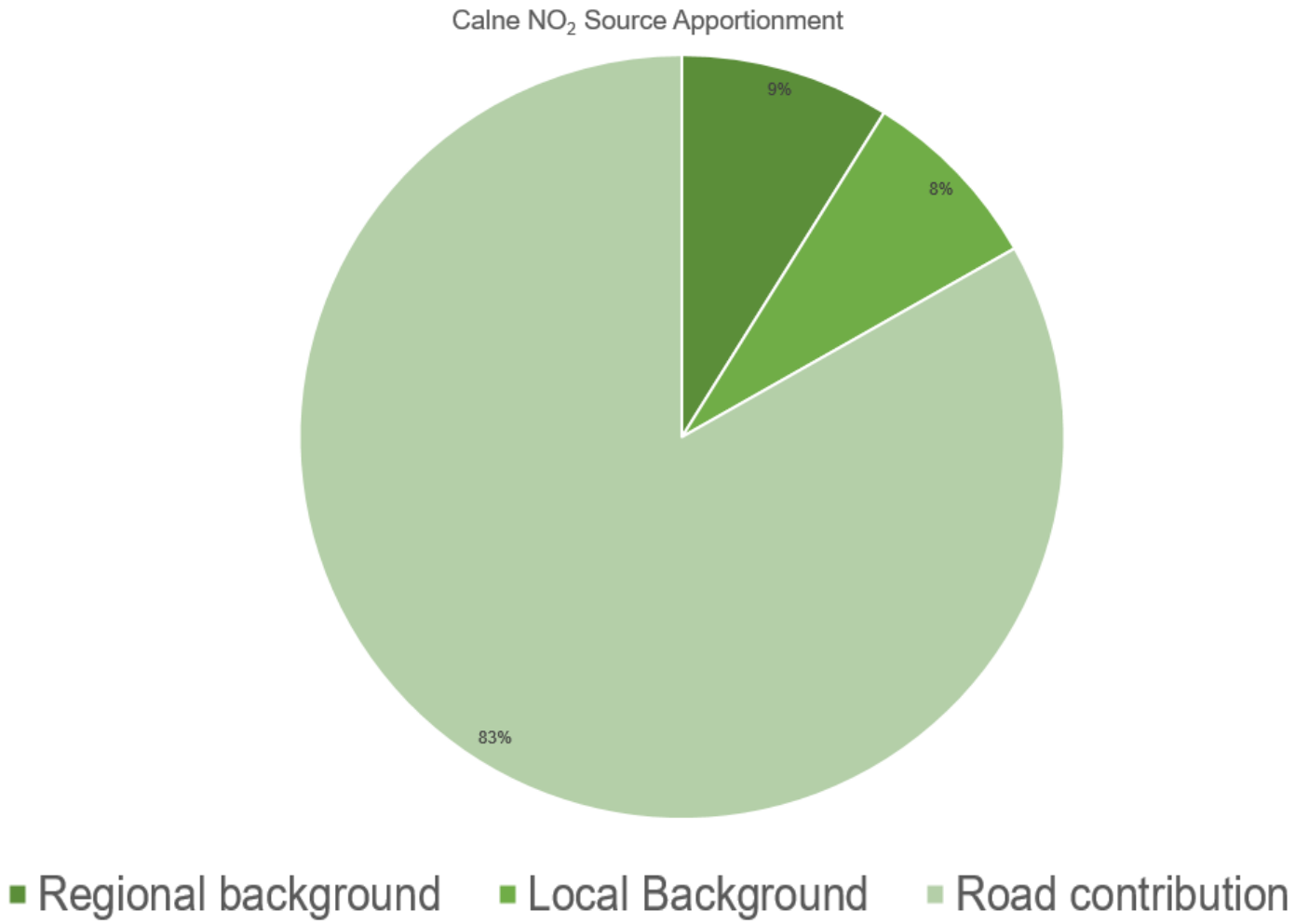
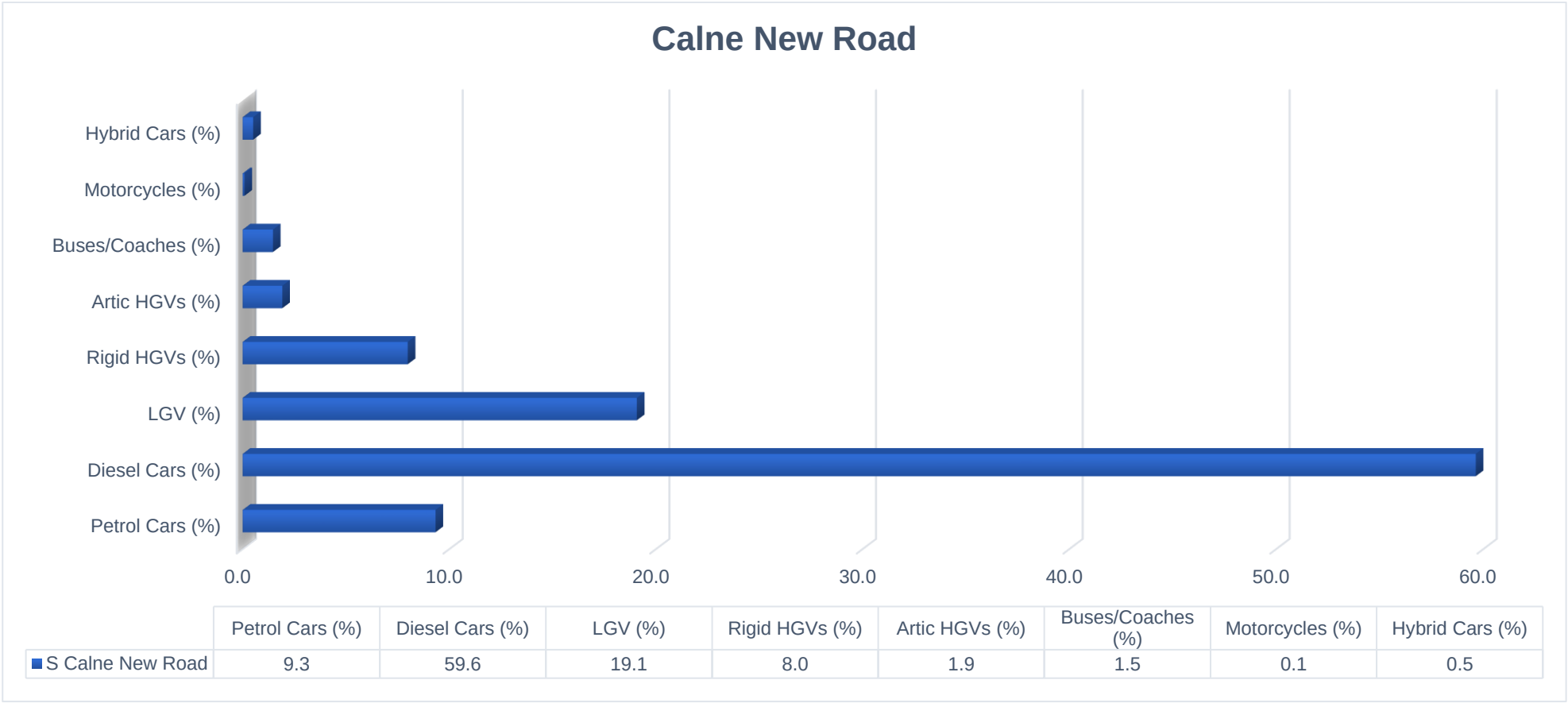


Figure C. 12: Calne AQMA Road NOx Source Apportionment



	Petrol Cars (%)	Diesel Cars (%)	LGV (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Motorcycles (%)	Hybrid Cars (%)
S Calne New Road	9.3	59.6	19.1	8.0	1.9	1.5	0.1	0.5

Appendix D: Reduction in road NOx Emission Calculation

The following is provided as an example of how the reduction in road NO_x emission required to meet the 40 µg/m^3 annual mean objective for NO_2 has been calculated. In this example, the measured or modelled NO_2 is 46 µg/m^3. It is based on the required reduction in the road NO_x concentration at the worst-case relevant exposure location.

Step 1: Use the NO_x to NO_2 calculator (see para 7.86 of Technical Guidance LAQM.TG(16)) to obtain the NO_x concentration that equates to the 46 µg/m^3 NO_2, which is 71.84 µg/m^3.

Step 2: Obtain the local background concentrations of NO_2 for the year of interest. This is 12.28 µg/m^3, from the background maps (see para 7.68 Technical Guidance LAQM.TG(16)).

Step 3: Calculate the road NO_x concentration required to give a total NO_2 concentration of 40 µg/m^3 i.e. the annual mean objective (road NO_x-required). This can be done using the NO_2 from NO_x calculator by entering a total NO_2 concentration of 40 µg/m^3 along with the local background NO_2 concentrations. The calculator gives the road NO_x-required concentration which is 57.3 µg/m^3.

Step 4: Calculate the road NO_x reduction to go from the road NO_x-current to the road NO_x-required. In this example the road NO_x reduction is 14.5 µg/m^3 (71.8 minus 57.3 µg/m^3), which represents a 20.2% reduction in road NO_x (14.5/71.8 as a percentage).

Table D.1: Reduction in road NOx Emission Calculation

AQMA	Maximum Modelled NO_2 Concentration in AQMA ($\mu g/m^3$)		Background NO_2		Modelled Road NO_2		Modelled Road NOx ($\mu g/m^3$)		Required Road NOx for 40 NO_2 ($\mu g/m^3$)		Required Road NOx reduction ($\mu g/m^3$) (% reduction required)		% Reduction Required	
	2019	2026	2019	2026	2019	2026	2019	2026	2019	2026	2019	2026	2019	2026
Salisbury City Centre	**47.3**	28.6	16.0	12.4	31.3	16.3	65.9	32.0	48.8	57.6	17.1 (26%)	-	25.98	-
Salisbury London Road	**42.4**	26.0	16.0	12.4	35.1	18.6	54.3	26.5	48.8	57.6	5.5 (10%)	-	10.20	-
Salisbury Wilton Road	**51.1**	30.9	16.0	12.4	26.4	13.6	75.1	37.0	48.8	57.6	26.3 (35.0)	-	35.0	-
Bradford-on-Avon	**68.5**	**43.7**	10.0	8.0	58.5	35.7	135.8	76.0	61.1	66.8	74.7 (55%)	9.2 (12%)	55.0	12.1
Westbury	**48.1**	27.9	9.5	7.3	38.6	20.6	81.8	40.4	62.1	68.3	19.7 (24%)	-	24.0	-
Marlborough	**58.5**	33.6	12.0	9.5	46.5	24.1	103.1	48.7	57.0	63.6	46.1 (45%)	-	44.7	-
Devizes	**56.7**	34.3	9.0	6.9	47.7	27.4	105.1	55.5	63.2	69.9	42.0 (39%)	-	39.9	-
Calne	**53.2**	32.5	9.0	7.1	44.2	25.4	95.7	51.0	63.2	68.8	32.6 (34%)	-	34.0	-

NO_2 concentrations shown in bold indicate exceedances of the AQS objective for annual mean NO_2 set at 40 $\mu g/m^3$, and underlined figures indicate potential exceedances of the short-term (1-hour) NO_2 objective.

Appendix E: Dispersion Modelling

ADMS Modelling

Modelling was carried out using ADMS-Roads v5 (Advanced Dispersion Modelling Software, Ref. 32) to predict pollutant concentrations in future scenarios based on historical data. The baseline year and the future year were 2019 and 2026 respectively. Both the baseline and future years were modelled to display the potential impacts of each measures at receptors in the AQMAs.

Meteorological Data

Meteorological data from different stations (Boscombe Down and Lyneham), meteorological stations representative of conditions at the respective AQMA, has been used in this assessment. The wind rose for Lyneham Airport for the year 2019 is shown in Figure E. 1 and Figure E. 2. This meteorological data year has been used in model verification to align with the most recent year of monitoring data available, and for all road traffic assessment model scenarios. Boscombe Down has complete data; Lyneham was missing 10% cloud cover data, with any missing data taken from nearby meteorological station Fairford.

Both sites therefore have acceptable data available for dispersion modelling. Boscombe Down had 8,607 of 8,760 useable lines, so 98.3% useable data. Lyneham Airport had 8,652 of 8,760 useable lines, so 98.8% useable data.

See the details below outlining the relevant meteorological stations and distances from each respective area.

- Salisbury - Boscombe Down (10 km),
- Bradford-on-Avon - Lyneham (25 km)
- Westbury - Lyneham (31 km)
- Marlborough -Lyneham (21 km)
- Devizes - Lyneham (17 km)
- Calne - Lyneham (7 km)

Figure E. 1: Boscombe Down Airport 2019 Meteorological Data Wind Rose

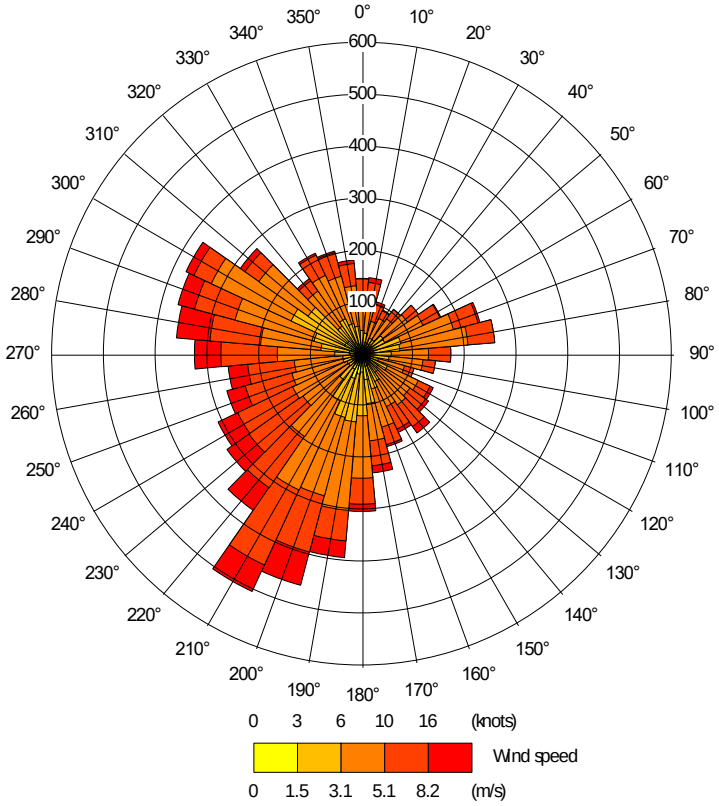
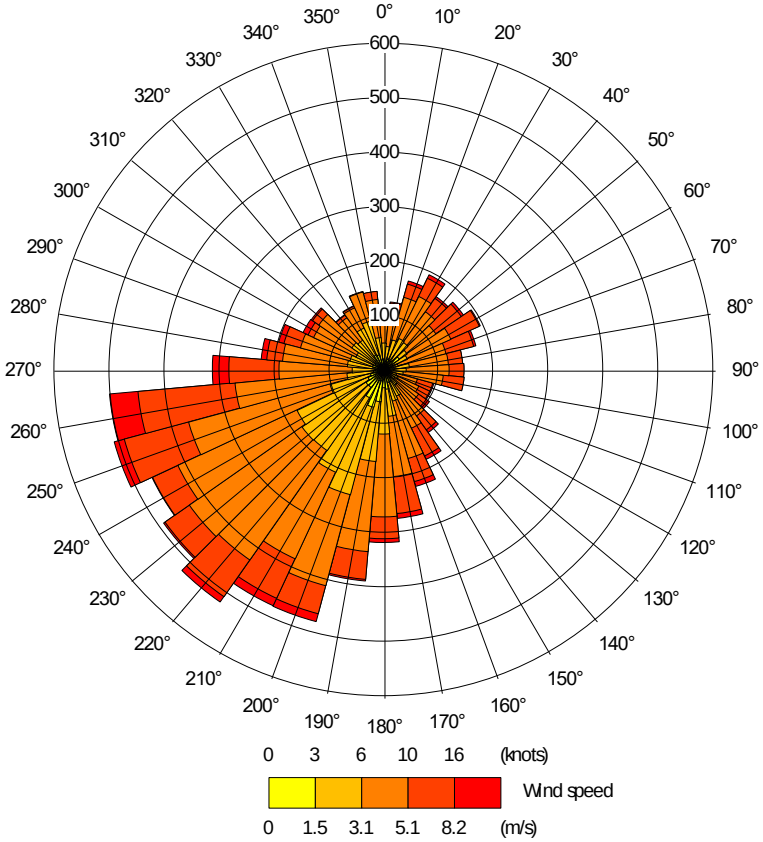


Figure E. 2: Lyneham Airport 2019 Meteorological Data Wind Rose



Background Maps

Defra publishes maps of background pollutant concentrations for each 1km x 1km grid square covering the whole of the United Kingdom. The most recent release of the background maps uses 2018 meteorological data as the reference year, and provides projections of background concentrations of NO_2, PM_{10} and $PM_{2.5}$ from 2018 to 2030 (Ref. 33). The mapped background NO_2, PM_{10} and $PM_{2.5}$ concentrations at each AQMA are within their respective annual mean AQS objectives for human health, and the maps generally predict a decrease in concentrations in future years.

For each AQMA, the appropriate background monitoring carried out by Wiltshire Council in the respective area was used, with any missing data for the AQMA taken from the aforementioned mapped backgrounds. The monitored 2019 background concentrations were also scaled to 2026 where relevant, using the forecasts within the Defra background maps.

EFT version

Traffic emissions for the detailed dispersion modelling have been calculated using Defra's Emission Factor Toolkit (EFT) version 10.1 (Ref. 19) for the selected years of assessment (using a 'Basic Split', 'Urban (Not London)' set up).

NOx to NO_2

Annual mean NO_2 concentrations were calculated from the modelled road-NO_x concentrations following the methodology in LAQM.TG(16) (Ref. 17). Defra's NO_x to NO_2 calculator v8.1 (Ref. 35) was used with the 'All other urban UK traffic' mix to convert modelled road NO_x to NO_2 concentrations, which were then added to background NO_2 concentrations for the relevant location and year.

Traffic Data

Traffic data used for modelling purposes was provided from Atkins for the baseline scenario in 2018 and for the future year scenario in 2026. These were provided in a format of one-way and two-way traffic and included the following information:

- Traffic flows for each peak period of the day - Time Periods (Average Hour):
    - AM Peak: 07:00-10:00;
    - Inter Peak: 10:00-16:00;
    - PM Peak: 16:00-19:00;
    - Off Peak: 19:00-07:00;
- Heavy Duty Vehicles percentage on each road link; and
- Speeds for each road link over each averaging period.

With the latest available NO_2 monitoring data for 2019 at time of modelling available, to ensure consistency the traffic data for 2018 was adjusted up to 2019 (the same year of monitoring) using ATC (Automatic Traffic Count) data available on roads for 2018 and 2019 across the AQMAs.

The data was provided in Average Annual Weekday Traffic (AAWT) for each period and therefore scaling factors were applied using the total AAWT and AADT (Average Annual Daily Traffic) to convert the traffic flows for each period into AADT period flows.

Where traffic data was not clearly representative of actual road traffic, these were supplemented/replaced with data from other sources. These included:

- Assumed speeds on roundabouts were 20 kph to simulate junction congestion, whereby information was not provided on these sections of the road network (Applied to AQMAs);
- Where speeds were deemed modelled in excess of designated speed limits on specific links, these links had speeds reduced to the enforced road limits;
- The Salisbury modelled network had traffic on certain road links replaced with ATC data provided from Tracsis (the modelled Atkins data heavily underestimated the traffic flows on certain links as compared to actual count data, due to known limitations with the traffic model); and
- Marlborough modelled domain had speeds (A346 only) updated with traffic data counts from the Wiltshire traffic team (Atkins traffic data had not modelled all roads in that area and therefore an unrepresentative speed was identified on the A346).

Receptors

Sensitive receptors were selected across all modelled roads based on information obtained from address base. A comprehensive network of receptors was modelled in each AQMA, representative of worst-case exposure at each road. Figures demonstrating the indicative location of each receptor are provided below, and a full list of the receptor locations considered is available on request.

Figure E.1: Modelled Road Network and Sensitive Receptors in Salisbury City Centre

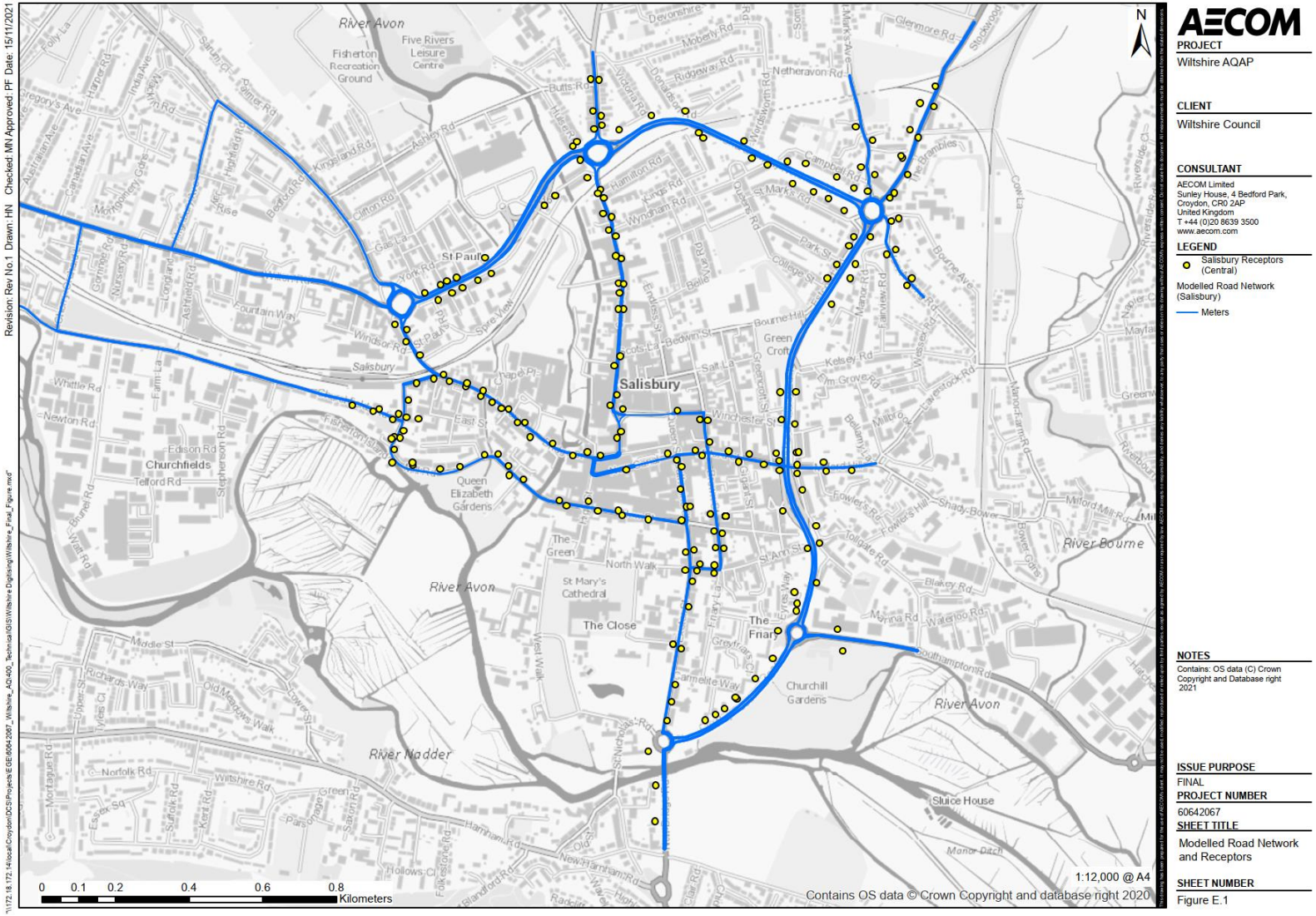


Figure E.2: Modelled Road Network and Sensitive Receptors in Salisbury Wilton Road

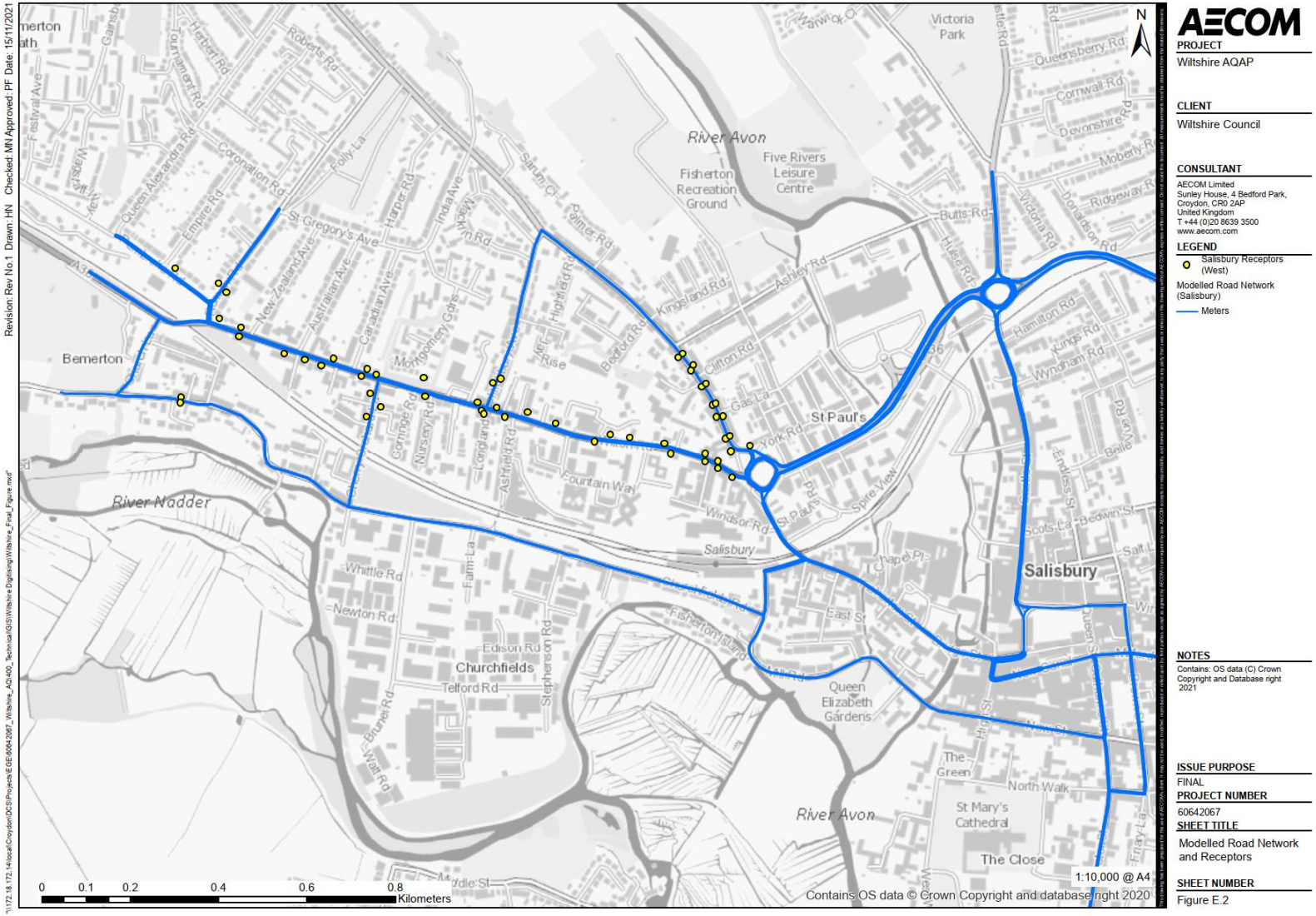


Figure E.3: Modelled Road Network and Sensitive Receptors in Bradford-on-Avon

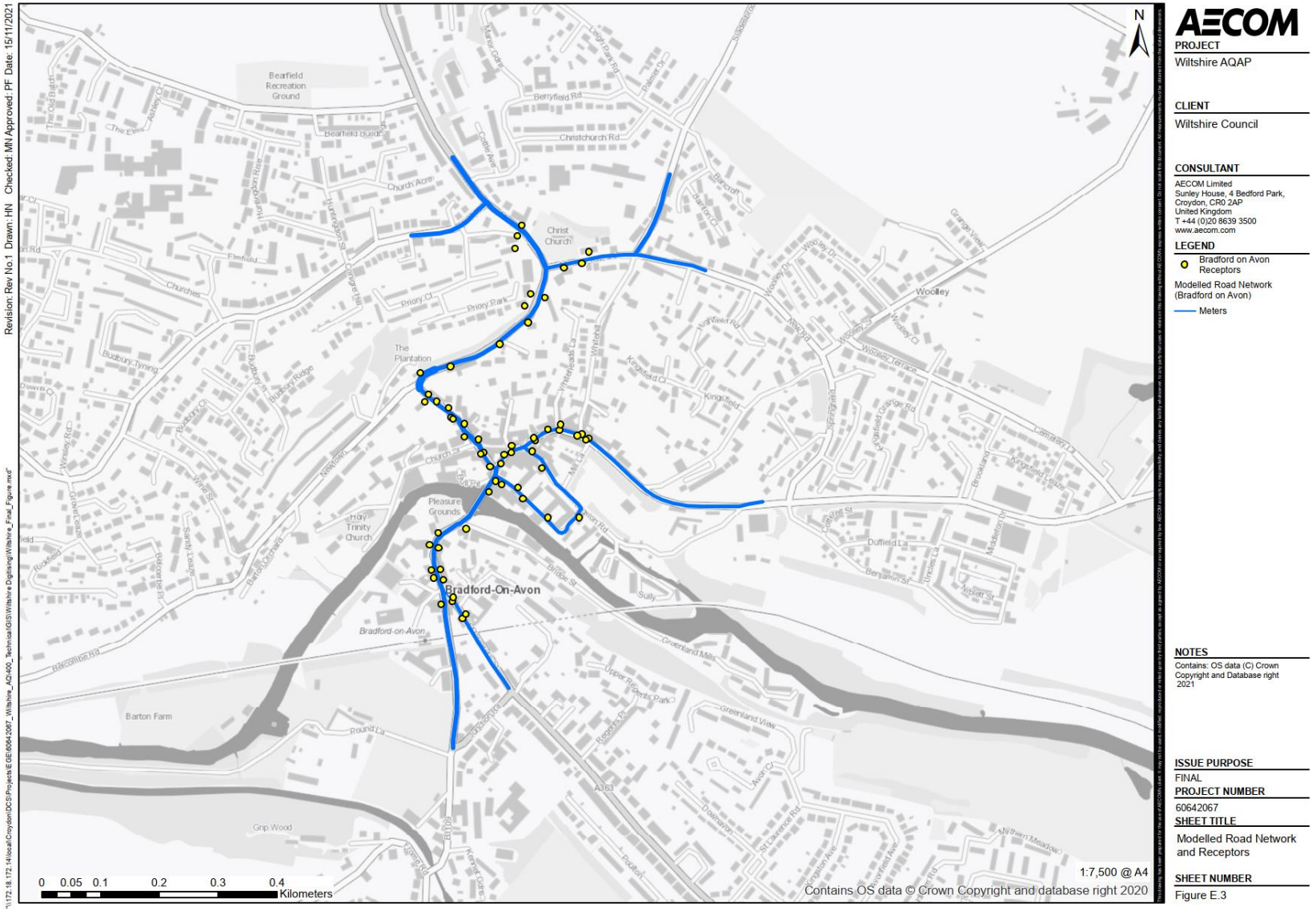


Figure E.4: Modelled Road Network and Sensitive Receptors in Westbury

Figure E.5: Modelled Road Network and Sensitive Receptors in Marlborough

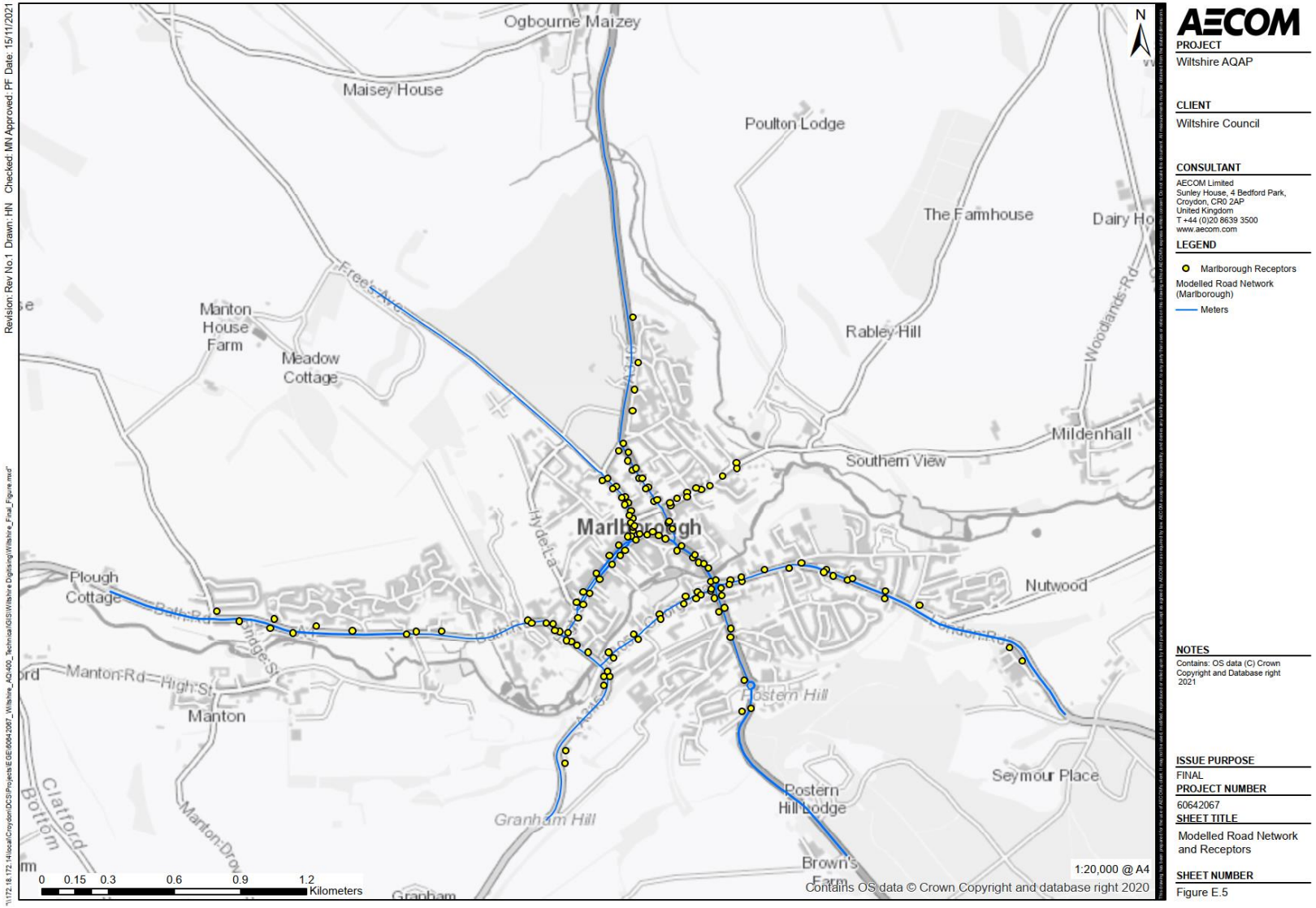


Figure E.6: Modelled Road Network and Sensitive Receptors in Devizes

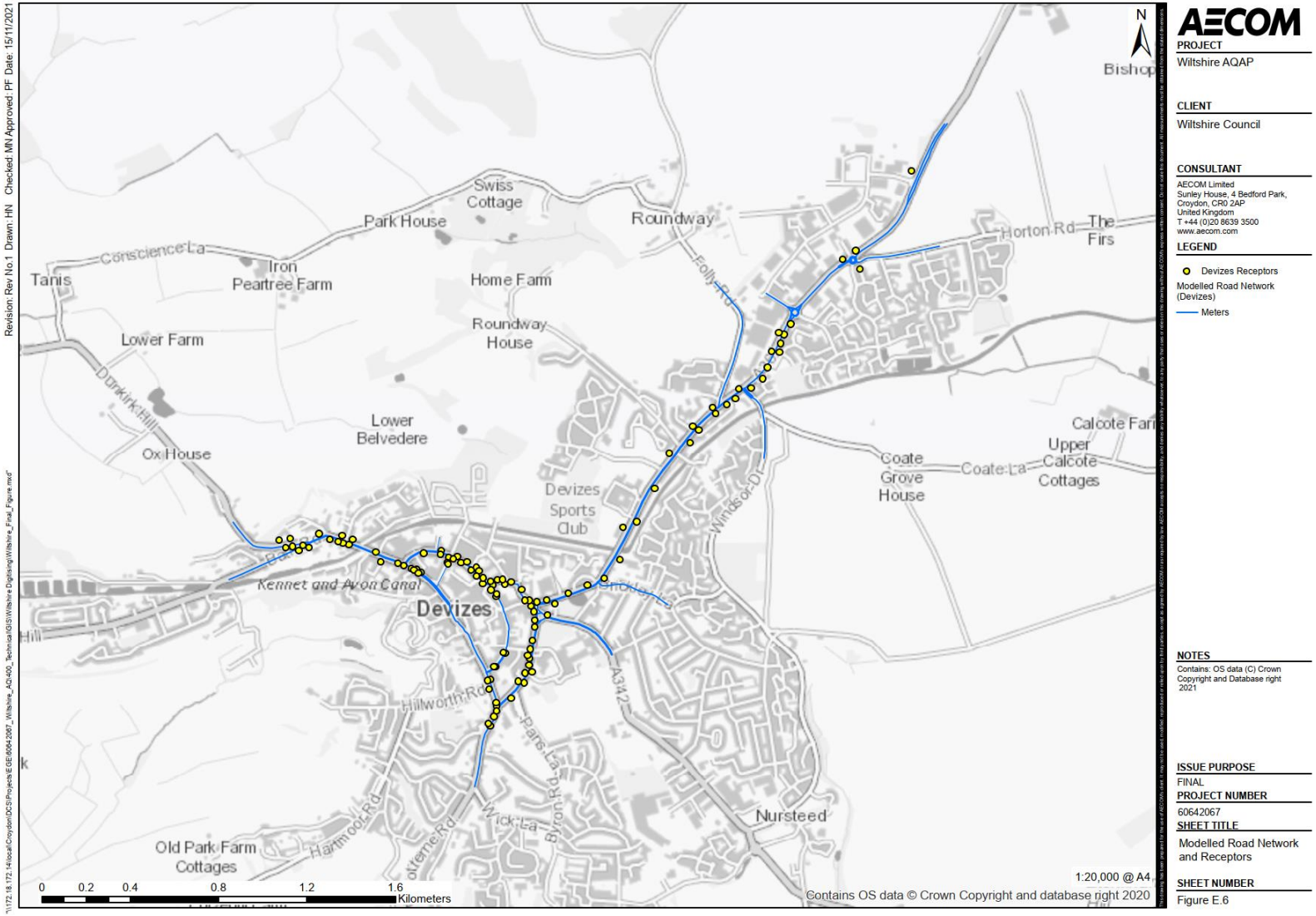
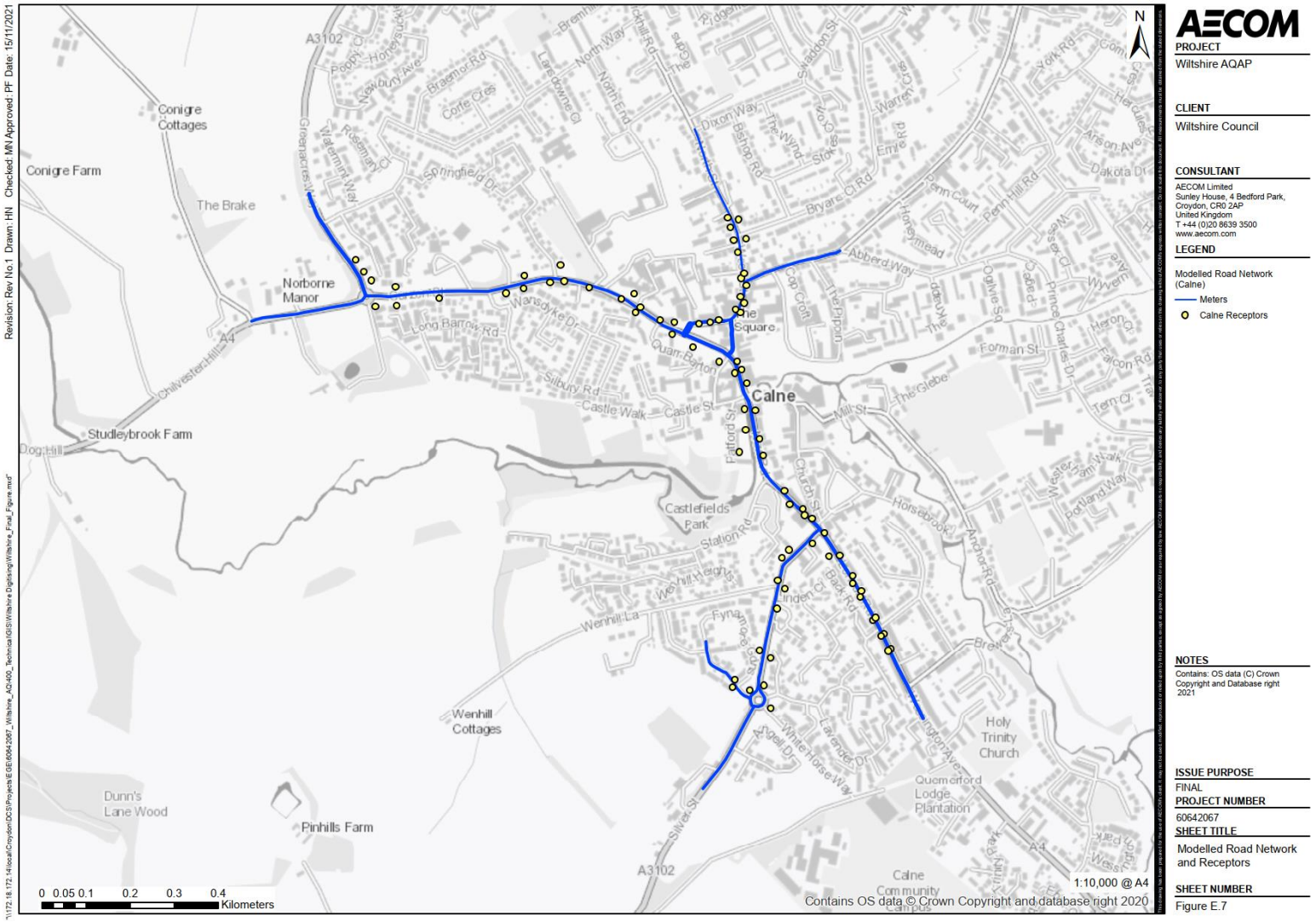


Figure E.7: Modelled Road Network and Sensitive Receptors in Calne



Assumptions and Limitations

The Wiltshire Traffic Model (WTM) which provides the traffic flows that fed into the Air Quality modelling has the following limitations:

- The WTM is a strategic model that has a large area of detailed modelling covering the entirety of Wiltshire, plus surrounding areas of significant importance (e.g. Swindon and Bath). The regional scale of the model means that in some instances, individual roads do not correlate well with observed traffic counts;
- The WTM version used at the time of modelling was in the process of being updated to provide a better corelation between modelled and observed data; and
- For the Salisbury AQMA (and to a lesser extent for other AQMAs), the WTM creates a simplification of the highway network structure, which excludes intricate details in the urban areas.

Measure A1 (Reintroduction of pedestrianisation in the City Centre):

From Vivacity sensors that are located directly along roads which were modelled in the network, an 11% reduction in vehicle use was observed from the period which the scheme was undertaken for (i.e. from 21/10/2021 to 30/11/2020) when compared to the available data for 2021, which was applied to the following road locations:

- Castle Street;
- Silver Street;
- New Canal;
- Bridge Street;
- Fisherton Street;
- Blue Boar Row;
- Winchester Street;
- Catherine Street;
- Brown Street; and
- Portion of St Ann Street located between St John's Street and Brown Street.

Measure A2 (Improvement of rail station connectivity with city centre):

Specific details of the measure that will be implemented are awaited.

Measure A3 (Improvements to junction near Wilton, Harnham Gyratory and Exeter Street roundabout):

Based on the limited information available (Ref. 34), the conservative option from a 23% reduction in delays along the route from Downton Road to London Road in preference to the 64% reduction between Harnham Gyratory and College Roundabout was used for modelling. The route between Downton Road to London Road also overlapped the modelling road network to a greater extent, thus making it more suitable for use. This reduction was estimated during the peak periods and therefore applied to the AM and PM peaks. Roads affected by the measure include connected roads to the Exeter Street Roundabout and Harnham Gyratory.

Measure A4 (MOVA upgrade on A36 roundabout traffic lights along Churchill Way):

It was assumed the impacts of this system would be felt during the peak periods and therefore adjustments were applied to the AM and PM peaks only. Information obtained from the MOVA website (Ref. 36), estimates between a 10% to 20% increase in speeds on roads the system is applied on. The conservative estimate of a 10% improvement was applied to the speeds at junctions on the following roads:

- St Pauls Roundabout;
- A36 Wilton Road;
- Churchill Road West;
- Castle Roundabout;
- Churchill way North;
- St Mark's Roundabout;
- St Marks Avenue;
- A30;
- Wain-A-Long Road; and
- Churchill Way East (North section only).

Measure A9 (Re-introduction of one-way system):

The following streets were modelled to have one-way access only:

- Market Street; and
- Silver Street.

The measure was modelled by removing traffic from the opposing direction on the one-way streets and re-introducing the greater of the traffic flows from the two roads mentioned above to be re-routed through Kingston Road and Bridge Yard. It was assumed that these two roads were 20mph, and no changes to the HGV % were implemented.

Measure A10 (Stricter weight limits restriction on Town Bridge):

This measure was implemented by changing the default fleet composition in the EFT to remove the Artic HGVs (weight of these vehicles are >14 tonnes) and ensuring that all the Rigid HGVs are <7.5 tonnes in weight. The overall number of HGVs was assumed to remain the same.

Measure A11 (Cutting back foliage on Masons Lane):

The canyon and associated effects experienced in the baseline scenarios were removed from sections of Masons Lane where applicable. This aided dispersion of the road NOx emissions along this road. No changes to the vehicular traffic were made.

Measure A12 (Junction optimisation at A350):

For this measure, speeds were assumed to be increased to 20 mph along all roads near the A350 improvements, which include the following:

- Station Road;
- A350 West End;
- A350 Haynes Road;
- A350 Warminster Road; and
- Bratton Road (Portion of road between A350 and Edward Street.

Measure A16 (Facilitate a shift from diesel to electric vehicles & reduce emissions contributed by HGV traffic):

Not modelled.

Measure A17 (Upgrade of buses from Euro IV to Euro VI):

Based on the current fleet composition available for traffic within the EFT and information available on the composition of the standard of buses operating in Marlborough, the fleet composition has been adjusted to ensure all buses will have Euro VI standards. Information about the changes to the bus composition in the baseline and future years for with and without the measure are shown below in the Table E. 1. As the baseline models were run prior to bus fleet information being made available, the default assumptions within the EFT were adjusted, normalised to the Council fleet information.

Table E. 1: Bus Compositions with and without measure Marlborough

Bus Composition	Pre-Euro I	Euro I	Euro II	Euro III	Euro IV	Euro V (Exhaust Gas Recirculation)	Euro V (Selective Catalytic Reduction)	Euro VI
2019								
Baseline	-	-	0.02	0.08	0.08	0.07	0.20	0.56
Measure	-	-	0.00	0.00	0.02	0.00	0.00	0.97
Changes	-	-	-0.02	-0.08	-0.06	-0.06	-0.20	+0.41
2026								
Baseline	-	-	-	0.01	0.01	0.01	0.04	0.93
Measure	-	-	-	-	-	-	-	1.00
Changes	-	-	-	-0.01	-0.01	-0.01	-0.04	+0.07

Measure A18 (Traffic improvements around Shanes Castle/Wadworth junctions):

For this measure, speeds were assumed to be increased to 20 mph along the Eastern portion of the A361 Bath Road that runs from the Shanes Castle to Belle Vue Road. This assumption was applied to the AM, IP and PM periods which are most likely to have observed speeds changes from junction improvements.

Measure A21 (Re-routing traffic via High Street):

This measure aims to re-open the High Street for vehicle access to by-pass Curzon Street. The Northbound traffic was diverted away from southern section of Curzon Street and re-routed through the High Street. Based on similar junctions within Wiltshire AQMAs, a 10% diversion of traffic was estimated to be travelling along the High Street.

Measure A22 (Upgrade of buses from Euro IV to Euro VI):

Based on the current fleet composition available for traffic within the EFT and information available on the composition of the standard of buses operating in Calne, the fleet composition has been adjusted to ensure all buses will have Euro VI standards. Information about the changes to the bus composition in the baseline and future years for with and without the measure are shown below in the Table E. 2. As the baseline models were run prior to bus fleet information being made available, the default assumptions within the EFT were adjusted, normalised to the Council fleet information.

Table E. 2: Bus Compositions with and without measure Calne

Bus Composition	Pre-Euro I	Euro I	Euro II	Euro III	Euro IV	Euro V (Exhaust Gas Recirculation)	Euro V (Selective Catalytic Reduction)	Euro VI
2019								
Baseline	-	-	0.02	0.08	0.08	0.07	0.20	0.56
Measure	-	-	0.01	0.06	0.06	0.05	0.15	0.66
Changes	-	-	-0.01	-0.02	-0.02	-0.02	-0.05	+0.1
2026								
Baseline	-	-	-	0.01	0.01	0.01	0.04	0.93
Measure	-	-	-	-	-	-	-	1.00
Changes	-	-	-	-0.01	-0.01	-0.01	-0.04	+0.07

Appendix F: Model Verification

The results predicted by a dispersion model may differ from measured concentrations for many reasons, including uncertainties associated with traffic flows and emissions factors, errors with the monitoring data itself and limitations inherent to the modelling software. In light of this, and in accordance with advice in LAQM.TG(16) (Ref. 17), for roads-based air quality assessments it is best-practice to perform a comparison of modelled results with local monitoring data to minimise these modelling uncertainties. This model verification process provides a factor, by which the output of the ADMS-Roads model can be adjusted, to gain greater confidence in the final results.

Wiltshire Council undertake extensive nitrogen dioxide monitoring using automatic monitors and diffusion tubes within all of the AQMAs, all of which were initially considered for their applicability to the dispersion modelling exercise. Where sites were not deemed suitable for inclusion, the reasons are demonstrated.

Owing to the geographic diversity of the AQMAs, which are spread across the county, a verification factor has been derived for each AQMA.

Bradford-on-Avon AQMA

In accordance with LAQM.TG(16), number of monitoring sites within the vicinity of the modelled domain were excluded from consideration for verification for the reasons presented in Table F. 1 below.

Table F. 1: Sites not considered for Verification – Bradford-on-Avon AQMA

Site ID	Monitoring Site Type	Monitored total NO_2 ($\mu g/m^3$)	Reason for Exclusion
DT35	Diffusion Tube	28	Triplicate site co-located with automatic monitor – Automatic monitor provides more robust comparison.
DT36	Diffusion Tube	28	
DT34	Diffusion Tube	28	

Table F. 2 below shows an initial comparison of the monitored and unverified modelled NO_2 results for the year 2019, in order to determine if verification and adjustment was required.

Table F. 2: Comparison of Unadjusted vs. Monitored NO_2 – Bradford-on-Avon AQMA

Site ID	Background NO_2 ($\mu g/m^3$)	Monitored total NO_2 ($\mu g/m^3$)	Modelled total NO_2 ($\mu g/m^3$)	% Difference (modelled vs. monitored)
AM2	10.0	31.0	16.6	-46.3
DT33	10.0	61.0	17.6	-71.1
DT37	10.0	44.0	27.5	-37.5

The model was shown to be under predicting at all locations. It is recommended in LAQM.TG(16) that all modelled results are within ±25% threshold of monitored concentrations with a preference for the concentration to be within ±10%. Further model adjustments have been made to obtain closer alignment of the modelled concentrations to the monitored concentrations. Model adjustment is undertaken based on the road NO_x component and not NO_2 so as to not introduce bias toward the background component.

Figure F. 1 shows a scatterplot of the modelled road NO_x concentrations versus monitored road NO_x concentrations, and the trend line based on linear regression

passing through zero. The equation of the trend line gives an adjustment factor of 2.387. This adjustment factor was applied to all modelled road NO_x outputs before conversion of NO_x to NO_2 and the addition of background concentrations.

The adjusted modelled results are summarised in Table F. 3 and Figure F. 2. Post adjustment, all modelled NO_2 concentrations are within the ±25% threshold recommended as being acceptable in LAQM.TG(16), and one of the sites are within the desirable ±10%. The adjustment reduces Root Mean Square Error (RMSE) from 20.3 µg/m^3 to 4.2 µg/m^3, and fractional bias from 0.5 to 0.01 indicating that adjusted modelled concentrations show a good agreement with measured values.

Table F. 3: Adjusted Road NOx and NO_2 – Bradford-on-Avon AQMA

Site ID	Ratio of monitored road contribution NO_x / modelled road contribution NO_x	Adjustment factor for modelled road NO_x	Adjusted modelled road contribution NOx (µg/m^3)	Adjusted Modelled total NO_2 (based upon empirical NOx / NO_2 relationship) (µg/m^3)	Monitored total NO_2 (µg/m^3)	% Difference (adjusted modelled NO_2 vs. monitored NO_2)
AM2	-66%	**2.387**	33.7	27.5	31.0	-11.2
DT33	-61%		106.1	57.9	61.0	-5.1
DT37	-50%		84.3	49.5	44.0	12.6

Figure F. 1: Modelled Road NOx vs Monitored Road NOx Before and After Adjustment – Bradford-on-Avon AQMA

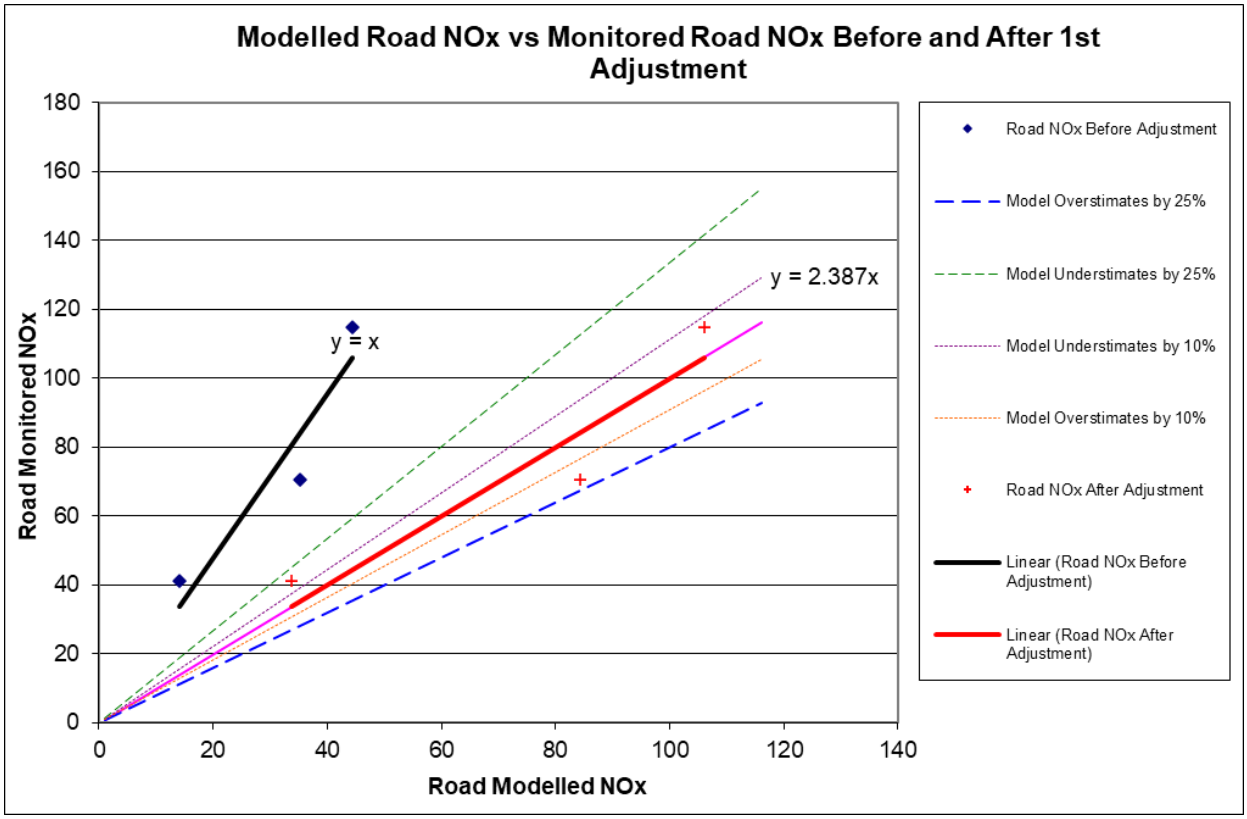
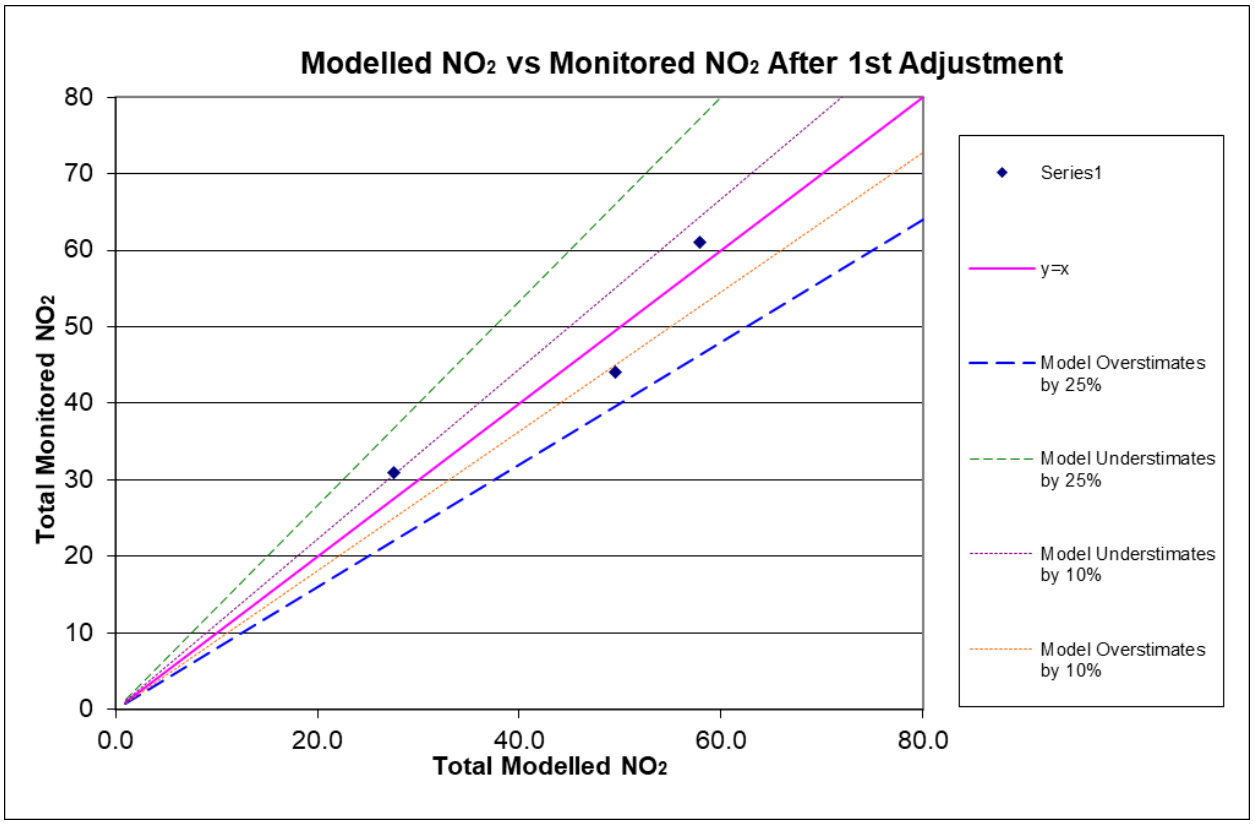


Figure F. 2: Adjusted Modelled NO_2 vs. Monitored NO_2 – Bradford-on-Avon AQMA



Calne

No sites were removed from the verification process. Table F. 4 below shows an initial comparison of the monitored and unverified modelled NO_2 results for the year 2019, in order to determine if verification and adjustment was required.

Table F. 4: Comparison of Unadjusted vs. Monitored NO_2 – Calne AQMA

Site ID	Background NO_2 (µg/m3)	Monitored total NO_2 (µg/m3)	Modelled total NO2 (µg/m3)	% Difference (modelled vs. monitored)
DT21	9.0	24.0	16.8	-48.2
DT20	9.0	28.0	21.2	-35.6
DT19	9.0	49.0	33.7	-38.2

The model was shown to be overpredicting at all locations with the exception of DT19. It is recommended in LAQM.TG(16) that all modelled results are within ±25% threshold of monitored concentrations with a preference for the concentration to be within ±10%. Further model adjustments have been made to obtain closer alignment of the modelled concentrations to the monitored concentrations. Model adjustment is undertaken based on the road NO_x component and not NO_2 so as to not introduce bias toward the background component.

Figure F. 3 shows a scatterplot of the modelled road NO_x concentrations versus monitored road NO_x concentrations, and the trend line based on linear regression passing through zero. The equation of the trend line gives an adjustment factor of 1.732. This adjustment factor was applied to all modelled road NO_x outputs before conversion of NO_x to NO_2 and the addition of background concentrations.

The adjusted modelled results are summarised in Table F. 5 and Figure F. 4. Post adjustment, all modelled NO_2 concentrations are within the ±25% threshold recommended as being acceptable in LAQM.TG(16), and all of the results are within the desirable ±10%. The adjustment reduces RMSE from 10.5 µg/m^3 to 1.4 µg/m^3, and fractional bias from 0.3 to 0.01 indicating that adjusted modelled concentrations show a good agreement with measured values.

Table F. 5: Adjusted Road NOx and NO_2 – Calne AQMA

Site ID	Ratio of monitored road contribution NO_x / modelled road contribution NO_x	Adjustment factor for modelled road NO_x	Adjusted modelled road contribution NOx ($\mu g/m^3$)	Adjusted Modelled total NO_2 (based upon empirical NOx / NO_2 relationship) ($\mu g/m^3$)	Monitored total NO_2 ($\mu g/m^3$)	% Difference (adjusted modelled NO_2 vs. monitored NO_2)
DT21	-50%	**1.732**	24.8	22.2	24.0	-7.7
DT20	-37%		39.7	29.4	28.0	5.1
DT19	-42%		84.7	48.9	49.0	-0.3

Figure F. 3: Modelled Road NOx vs Monitored Road NOx Before and After Adjustment – Calne AQMA

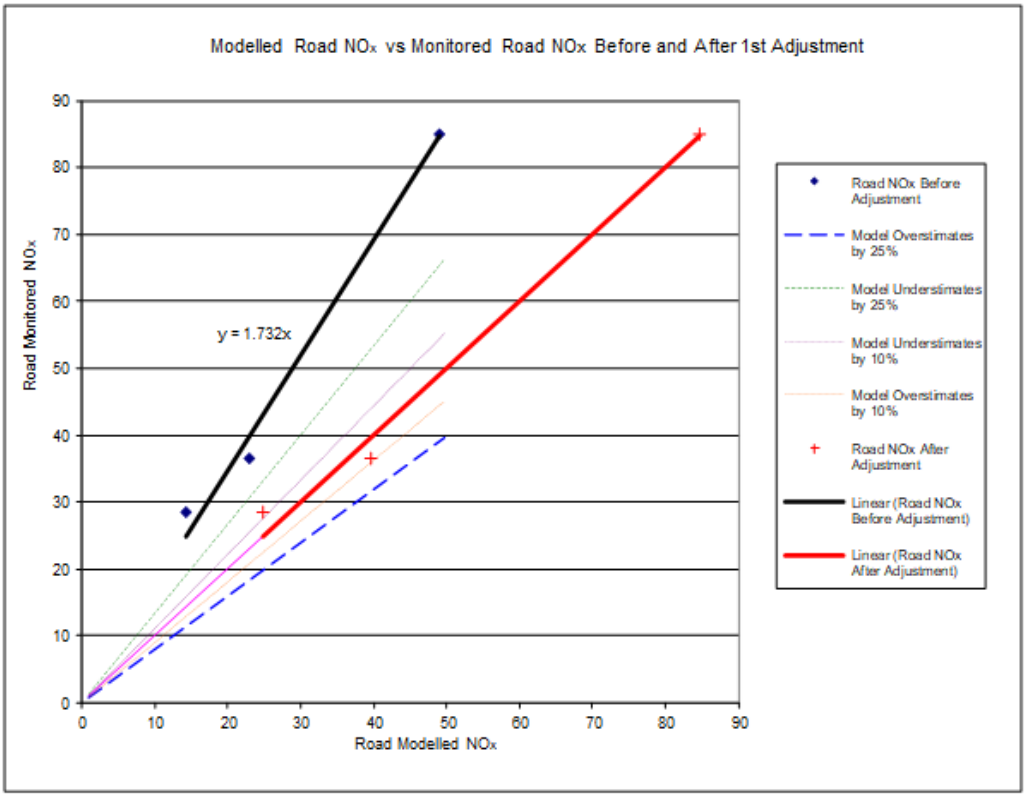
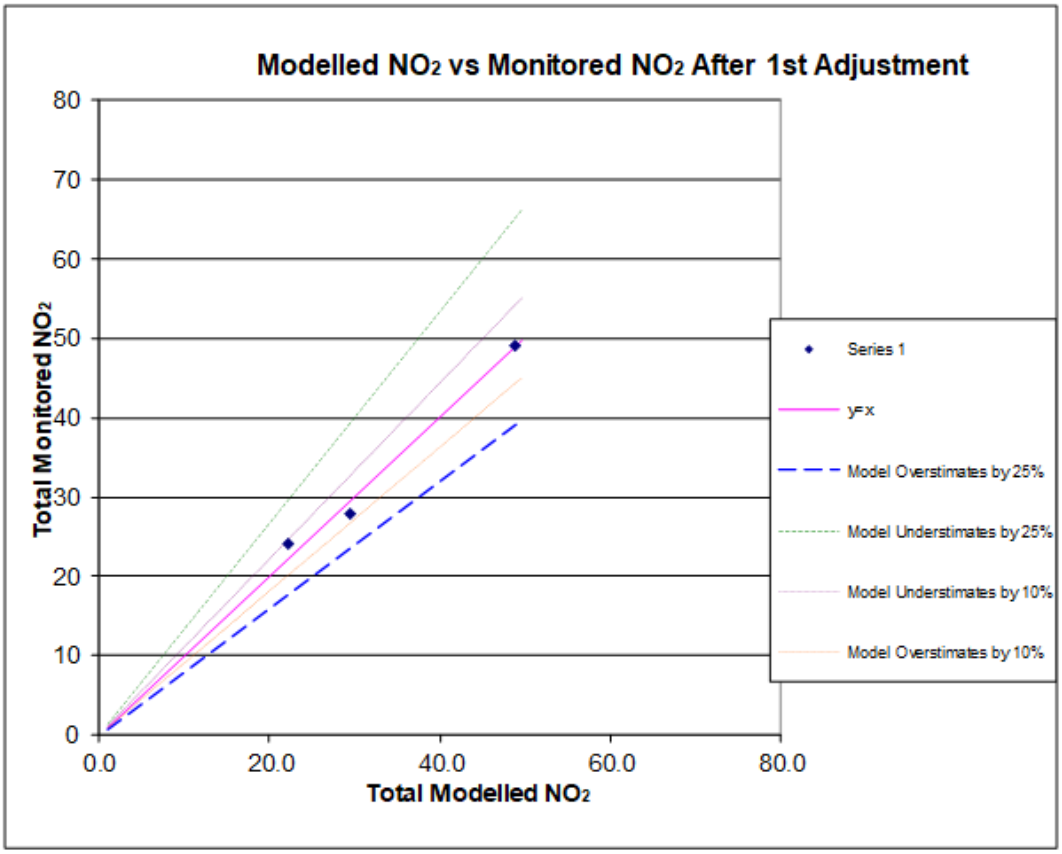


Figure F. 4: Adjusted Modelled NO_2 vs. Monitored NO_2 – Calne AQMA



Devizes AQMA

In accordance with LAQM.TG(16), a number of monitoring sites within the vicinity of the modelled domain were excluded from consideration for verification for the reasons presented in Table F. 6 below.

Table F. 6: Sites not considered for Verification – Devizes AQMA

Site ID	Monitoring Site Type	Monitored total NO_2 ($\mu g/m^3$)	Reason for Exclusion
DT3	Diffusion Tube	38.0	Monitoring location is shielded from emissions by the building located beside it, so was underpredicting roadside contributions versus the model.
DT5	Diffusion Tube	18.0	Removed due to location being on the edge of modelled road network, therefore not all contributory road sources could be modelled.

Table F. 7 below shows an initial comparison of the monitored and unverified modelled NO_2 results for the year 2019, in order to determine if verification and adjustment was required.

Table F. 7: Comparison of Unadjusted vs. Monitored NO_2 – Devizes AQMA

Site ID	Background NO_2 ($\mu g/m^3$)	Monitored total NO_2 ($\mu g/m^3$)	Modelled total NO_2 ($\mu g/m^3$)	% Difference (modelled vs. monitored)
DT2	9.0	38.0	15.7	-58.7
DT4	9.0	40.0	15.5	-61.2
AM3	9.0	37.0	14.6	-60.4
DT7	9.0	35.0	15.2	-56.5
DT6	9.0	35.0	15.3	-56.4

The model was shown to be under predicting at all locations. It is recommended in LAQM.TG(16) that all modelled results are within ±25% threshold of monitored concentrations with a preference for the concentration to be within ±10%. Further model adjustments have been made to obtain closer alignment of the modelled concentrations to the monitored concentrations. Model adjustment is undertaken

based on the road NO_x component and not NO_2 so as to not introduce bias toward the background component.

Figure F. 5 shows a scatterplot of the modelled road NO_x concentrations versus monitored road NO_x concentrations, and the trend line based on linear regression passing through zero. The equation of the trend line gives an adjustment factor of 4.8979. This adjustment factor was applied to all modelled road NO_x outputs before conversion of NO_x to NO_2 and the addition of background concentrations.

The adjusted modelled results are summarised in Table F.8 and Figure F. 6. Post adjustment, all modelled NO_2 concentrations are within the ±25% threshold recommended as being acceptable in LAQM.TG(16), and all of the results are within the desirable ±10%. The adjustment reduces Root Mean Square Error (RMSE) from 23.1 µg/m^3 to 1.9 µg/m^3, and fractional bias from 0.9 to <0.01 indicating that adjusted modelled concentrations show a good agreement with measured values.

Table F.8: Adjusted Road NOx and NO_2 – Devizes AQMA

Site ID	Ratio of monitored road contribution NO_x / modelled road contribution NO_x	Adjustment factor for modelled road NO_x	Adjusted modelled road contribution NOx (µg/m^3)	Adjusted Modelled total NO_2 (based upon empirical NOx / NO_2 relationship) (µg/m^3)	Monitored total NO_2 (µg/m^3)	% Difference (adjusted modelled NO_2 vs. monitored NO_2)
DT2	-79%	**4.898**	60.3	38.7	38.0	1.9
DT4	-81%		58.5	38.0	40.0	-5.1
AM3	-82%		50.4	34.4	37.0	-7.1
DT7	-78%		55.7	36.7	35.0	5.0
DT6	-78%		56.2	37.0	35.0	5.7

Figure F. 5: Modelled Road NOx vs Monitored Road NOx Before and After Adjustment – Devizes AQMA

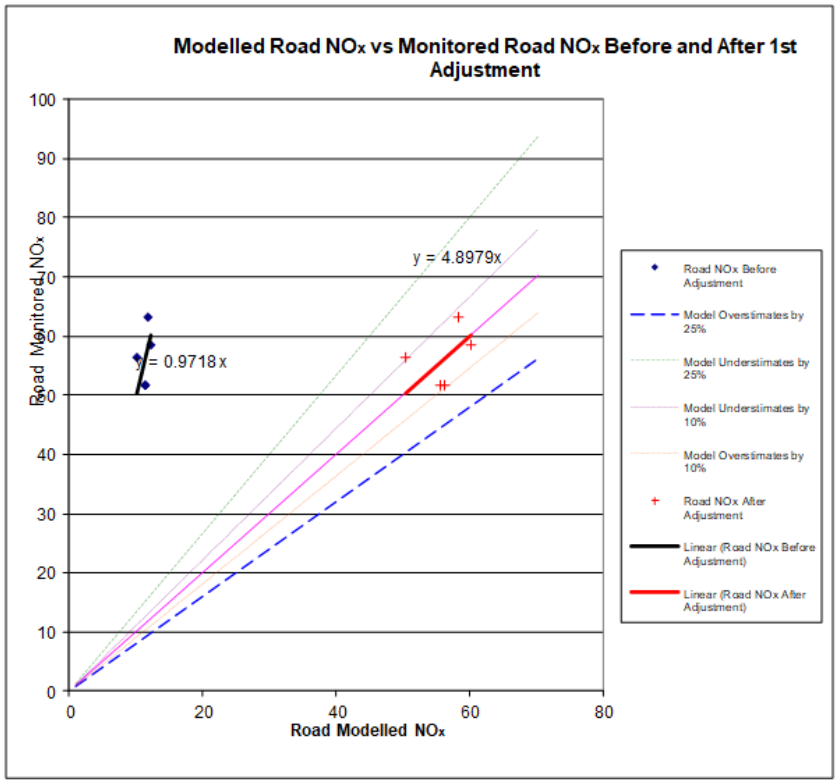
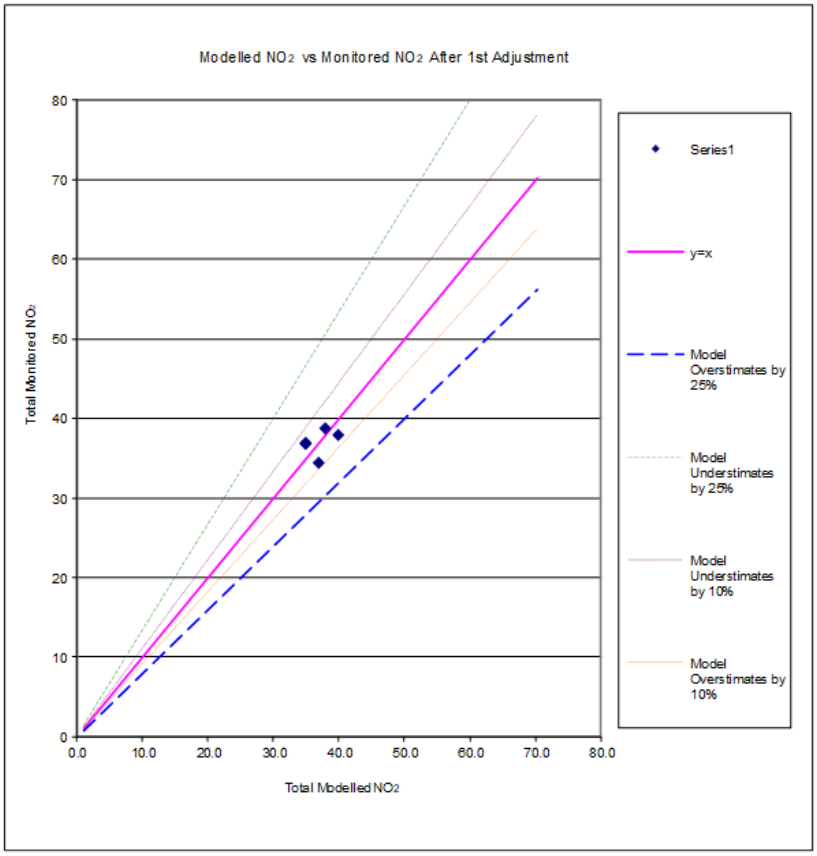


Figure F. 6: Adjusted Modelled NO_2 vs. Monitored NO_2 – Devizes AQMA



Marlborough

No sites were removed from the verification process. Table F. 9 below shows an initial comparison of the monitored and unverified modelled NO_2 results for the year 2019, in order to determine if verification and adjustment was required.

Table F. 9: Comparison of Unadjusted vs. Monitored NO_2 – Marlborough AQMA

Site ID	Background NO_2 (µg/m^3)	Monitored total NO_2 (µg/m^3)	Modelled total NO_2 (µg/m^3)	% Difference (modelled vs. monitored)
DT13	12.0	31.0	15.3	-50.6
DT15	12.0	34.0	17.0	-49.9
DT10	12.0	47.0	17.9	-61.9

The model was shown to be under predicting at all locations. It is recommended in LAQM.TG(16) that all modelled results are within ±25% threshold of monitored concentrations with a preference for the concentration to be within ±10%. Further model adjustments have been made to obtain closer alignment of the modelled concentrations to the monitored concentrations. Model adjustment is undertaken based on the road NO_x component and not NO_2 so as to not introduce bias toward the background component.

Figure F. 7 shows a scatterplot of the modelled road NO_x concentrations versus monitored road NO_x concentrations, and the trend line based on linear regression passing through zero. The equation of the trend line gives an adjustment factor of 5.1299. This adjustment factor was applied to all modelled road NO_x outputs before conversion of NO_x to NO_2 and the addition of background concentrations. Due to limited monitoring in the available in the area, a high verification factor was obtained and the results are deemed to be a conservative (i.e. worst case scenario).

The adjusted modelled results are summarised in Table F.10 and Figure F. 8. Post adjustment, all modelled NO_2 concentrations are within the ±25% threshold recommended as being acceptable in LAQM.TG(16), and all of the results are within the desirable ±10%. The adjustment reduces Root Mean Square Error (RMSE) from 21.4 µg/m^3 to 2.4 µg/m^3, and fractional bias from 0.8 to 0.02 indicating that adjusted modelled concentrations show a good agreement with measured values.

Table F.10: Adjusted Road NOx and NO_2 – Marlborough AQMA

Site ID	Ratio of monitored road contribution NO_x / modelled road contribution NO_x	Adjustment factor for modelled road NO_x	Adjusted modelled road contribution NOx ($\mu g/m^3$)	Adjusted Modelled total NO_2 (based upon empirical NOx / NO_2 relationship) ($\mu g/m^3$)	Monitored total NO_2 ($\mu g/m^3$)	% Difference (adjusted modelled NO_2 vs. monitored NO_2)
DT13	-16%	**5.1299**	31.18	28.2	31.0	-9.2
DT15	9%		47.47	35.8	34.0	5.2
DT10	-24%		56.26	39.7	47.0	-15.6

Figure F. 7: Modelled Road NOx vs Monitored Road NOx Before and After Adjustment – Marlborough AQMA

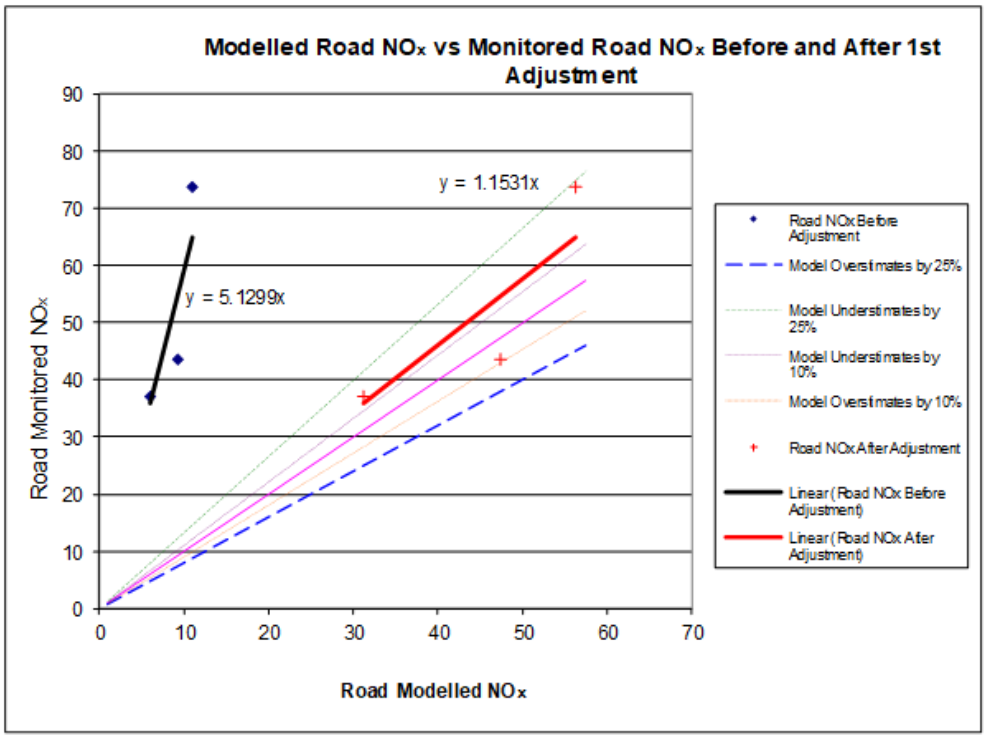
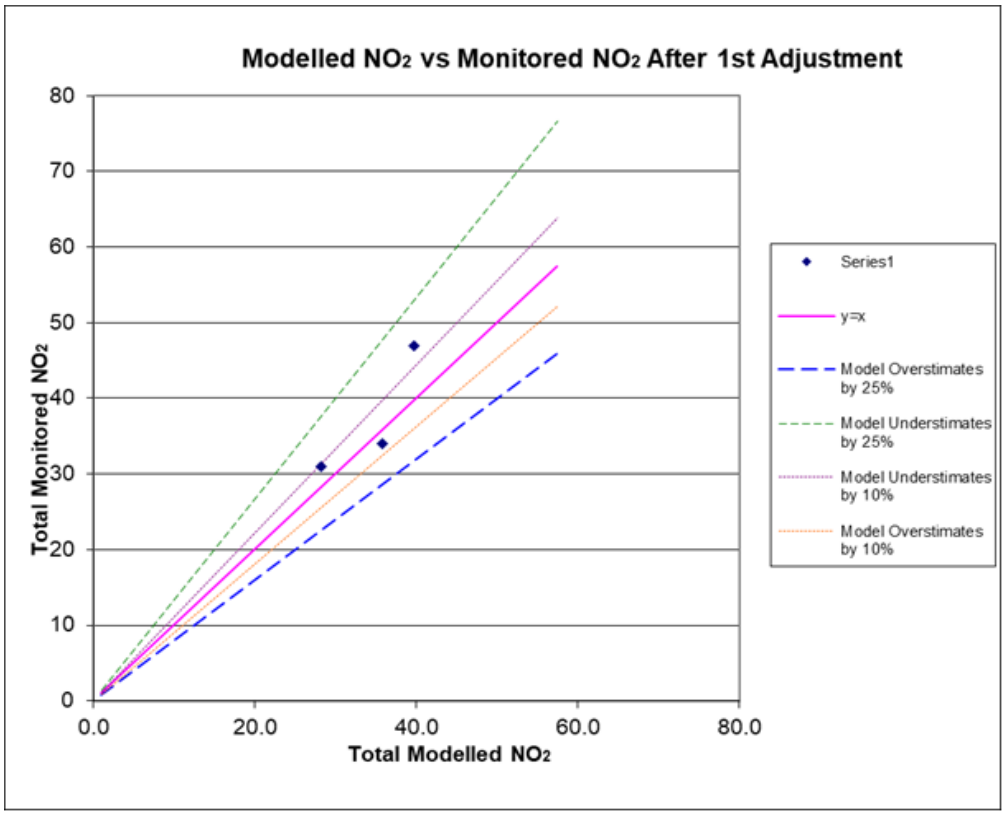


Figure F. 8: Adjusted Modelled NO_2 vs. Monitored NO_2 – Marlborough AQMA



Westbury

No sites were removed from the verification process. Table F. 11 below shows an initial comparison of the monitored and unverified modelled NO_2 results for the year 2019, in order to determine if verification and adjustment was required.

Table F. 11: Comparison of Unadjusted vs. Monitored NO_2 – Westbury AQMA

Site ID	Background NO_2 (µg/m^3)	Monitored total NO_2 (µg/m^3)	Modelled total NO_2 (µg/m^3)	% Difference (modelled vs. monitored)
DT28	9.5	9.5	18.7	-46.5
DT29	7.3	7.3	19.5	-53.7

The model was shown to be under predicting at all locations. It is recommended in LAQM.TG(16) that all modelled results are within ±25% threshold of monitored concentrations with a preference for the concentration to be within ±10%. Further model adjustments have been made to obtain closer alignment of the modelled concentrations to the monitored concentrations. Model adjustment is undertaken based on the road NO_x component and not NO_2 so as to not introduce bias toward the background component.

Figure F. 9 shows a scatterplot of the modelled road NO_x concentrations versus monitored road NO_x concentrations, and the trend line based on linear regression passing through zero. The equation of the trend line gives an adjustment factor of 3.0871. This adjustment factor was applied to all modelled road NO_x outputs before conversion of NO_x to NO_2 and the addition of background concentrations. It should be noted that limited monitoring was available for the Westbury network model to be verified against.

The adjusted modelled results are summarised in Table F.12 and Figure F. 10. Post adjustment, all modelled NO_2 concentrations are within the ±25% threshold recommended as being acceptable in LAQM.TG(16), and all of the results are within the desirable ±10%. The adjustment reduces Root Mean Square Error (RMSE) from 19.7 µg/m^3 to 0.8 µg/m^3, and fractional bias from 0.7 to <0.01 indicating that adjusted modelled concentrations show a good agreement with measured values.

Table F.12: Adjusted Road NOx and NO_2 – Westbury AQMA

Site ID	Ratio of monitored road contribution NO_x / modelled road contribution NO_x	Adjustment factor for modelled road NO_x	Adjusted modelled road contribution NOx ($\mu g/m^3$)	Adjusted Modelled total NO_2 (based upon empirical NOx / NO_2 relationship) ($\mu g/m^3$)	Monitored total NO_2 ($\mu g/m^3$)	% Difference (adjusted modelled NO_2 vs. monitored NO_2)
DT28	-66%	**3.0871**	52.87	35.9	35.0	2.7
DT29	-68%		69.80	41.3	42.0	-1.6

Figure F. 9: Modelled Road NOx vs Monitored Road NOx Before and After Adjustment – Westbury AQMA

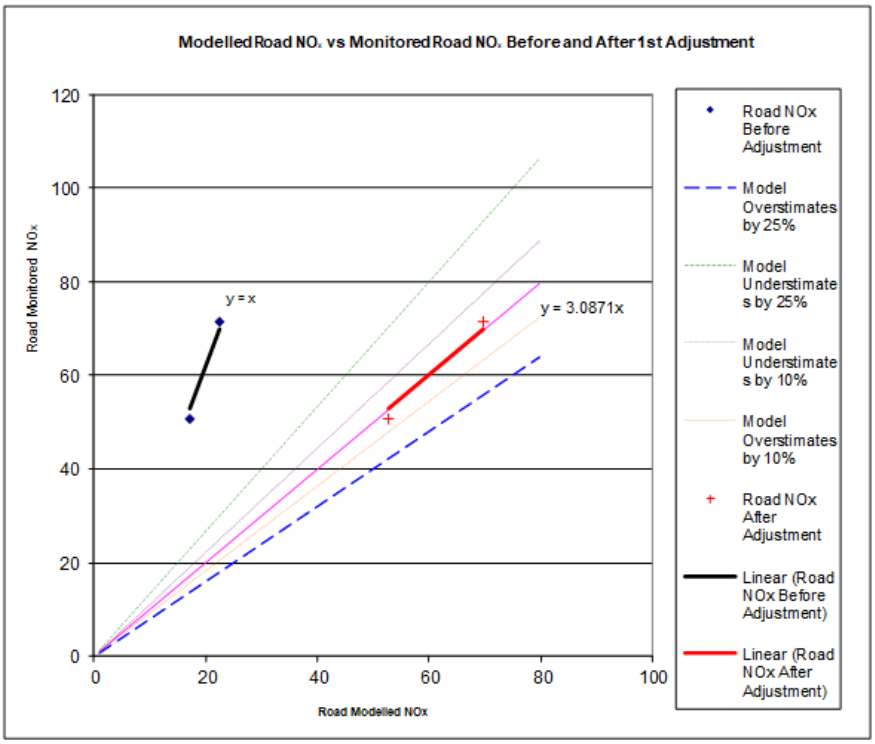
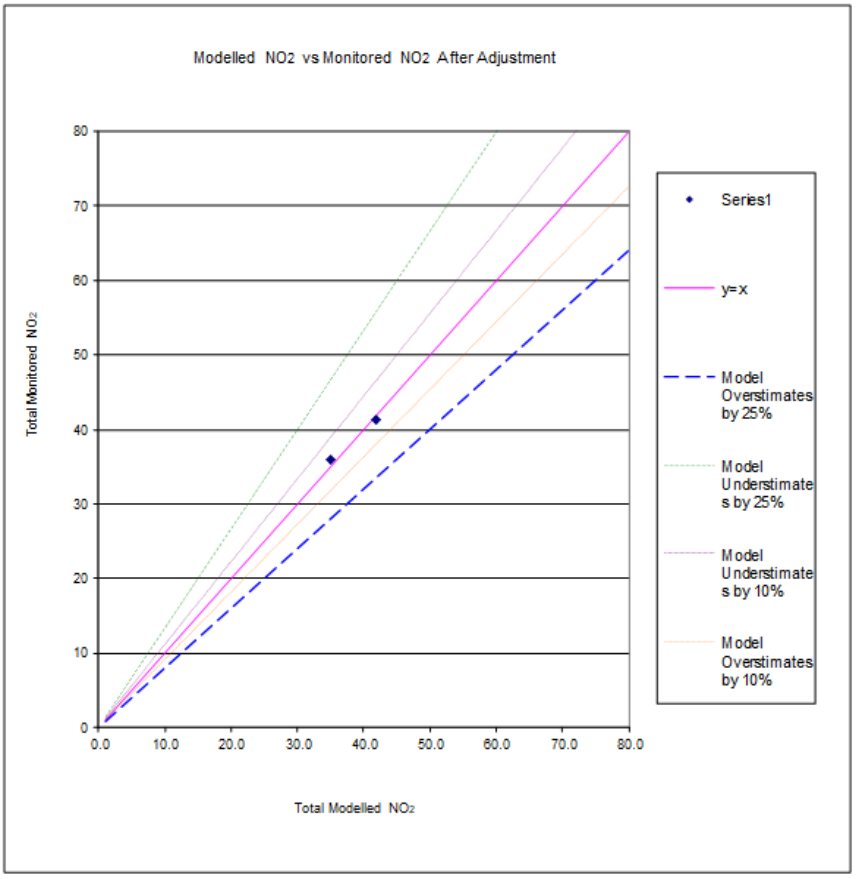


Figure F. 10: Adjusted Modelled NO_2 vs. Monitored NO_2 – Westbury AQMA



Salisbury City Centre AQMA

For the purpose of model verification, the Salisbury City Centre and A36 Wilton Road AQMAs were considered in combination. In accordance with LAQM.TG(16), number of monitoring sites within the vicinity of the modelled domain were excluded from consideration for verification for the reasons presented in Table F. 13 below.

Table F. 13: Sites not considered for Verification – Salisbury City Centre AQMAs

Site ID	Monitoring Site Type	Monitored total NO_2 ($\mu g/m^3$)	Reason for Exclusion
DT74	Diffusion Tube	28	Monitoring Location is near a bus stop, therefore road sources could not be modelled accurately.

Table F. 14 below shows an initial comparison of the monitored and unverified modelled NO_2 results for the year 2019, in order to determine if verification and adjustment was required.

Table F. 14: Comparison of Unadjusted vs. Monitored NO_2 – Salisbury City Centre AQMAs

Site ID	Background NO_2 ($\mu g/m^3$)	Monitored total NO_2 ($\mu g/m^3$)	Modelled total NO_2 ($\mu g/m^3$)	% Difference (modelled vs. monitored)
DT59	16.0	44.0	27.9	-36.5
DT67	16.0	35.0	25.7	-26.6
AM1	16.0	30.0	23.0	-23.3
DT68	16.0	35.0	21.8	-37.8
DT53	16.0	37.0	25.5	-31.2
DT70	16.0	36.0	22.5	-37.5
DT52	16.0	36.0	24.9	-30.7
DT56	16.0	30.0	23.8	-20.6

The model was shown to be under predicting at all locations. It is recommended in LAQM.TG(16) that all modelled results are within ±25% threshold of monitored concentrations with a preference for the concentration to be within ±10%. Further model adjustments have been made to obtain closer alignment of the modelled concentrations to the monitored concentrations. Model adjustment is undertaken

based on the road NO_x component and not NO_2 so as to not introduce bias toward the background component.

Figure F. 11 shows a scatterplot of the modelled road NO_x concentrations versus monitored road NO_x concentrations, and the trend line based on linear regression passing through zero. The equation of the trend line gives an adjustment factor of 2.3909. This adjustment factor was applied to all modelled road NO_x outputs before conversion of NO_x to NO_2 and the addition of background concentrations.

The adjusted modelled results are summarised in Table F.15 and Figure F. 12. Post adjustment, all modelled NO_2 concentrations are within the ±25% threshold recommended as being acceptable in LAQM.TG(16), and all of the results are within the desirable ±10%. The adjustment reduces Root Mean Square Error (RMSE) from 11.4 µg/m^3 to 3.3 µg/m^3, and fractional bias from 0.4 to <0.01 indicating that adjusted modelled concentrations show a good agreement with measured values.

Table F.15: Adjusted Road NOx and NO_2 – Salisbury City Centre AQMAs

Site ID	Ratio of monitored road contribution NO_x / modelled road contribution NO_x	Adjustment factor for modelled road NO_x	Adjusted modelled road contribution NOx (µg/m^3)	Adjusted Modelled total NO_2 (based upon empirical NOx / NO_2 relationship) (µg/m^3)	Monitored total NO_2 (µg/m^3)	% Difference (adjusted modelled NO_2 vs. monitored NO_2)
DT59	-60%	**2.391**	55.0	42.7	44.0	-3.0
DT67	-51%		44.2	37.9	35.0	8.4
AM1	-51%		31.7	32.1	30.0	7.1
DT68	-71%		25.8	29.3	35.0	-16.2
DT53	-57%		43.1	37.5	37.0	1.3
DT70	-69%		29.3	31.0	36.0	-13.8
DT52	-57%		40.6	36.3	36.0	0.9
DT56	-46%		35.4	33.9	30.0	12.9

Figure F. 11: Modelled Road NOx vs Monitored Road NOx Before and After Adjustment – Salisbury City Centre AQMAs

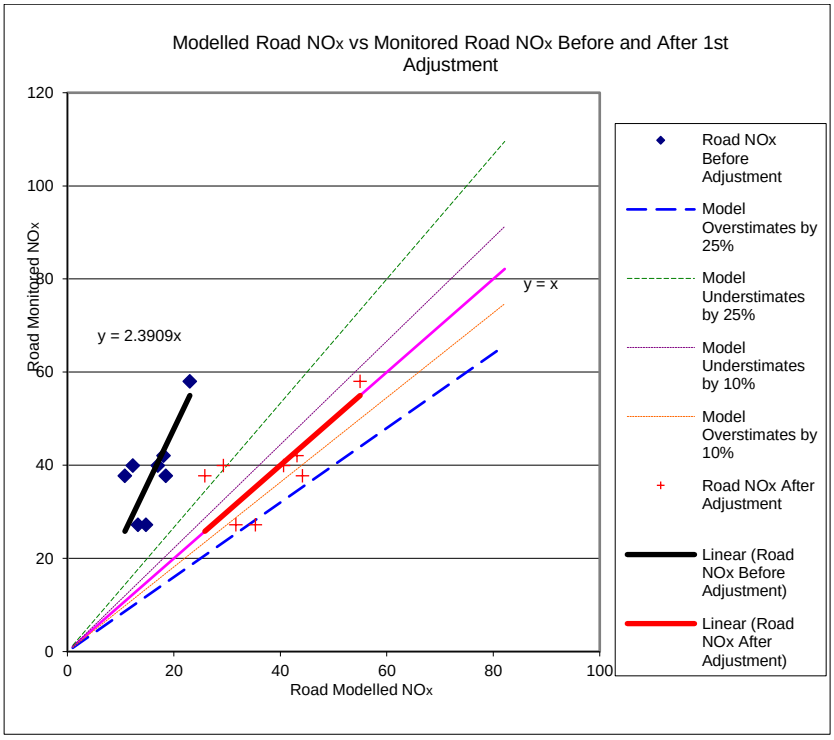
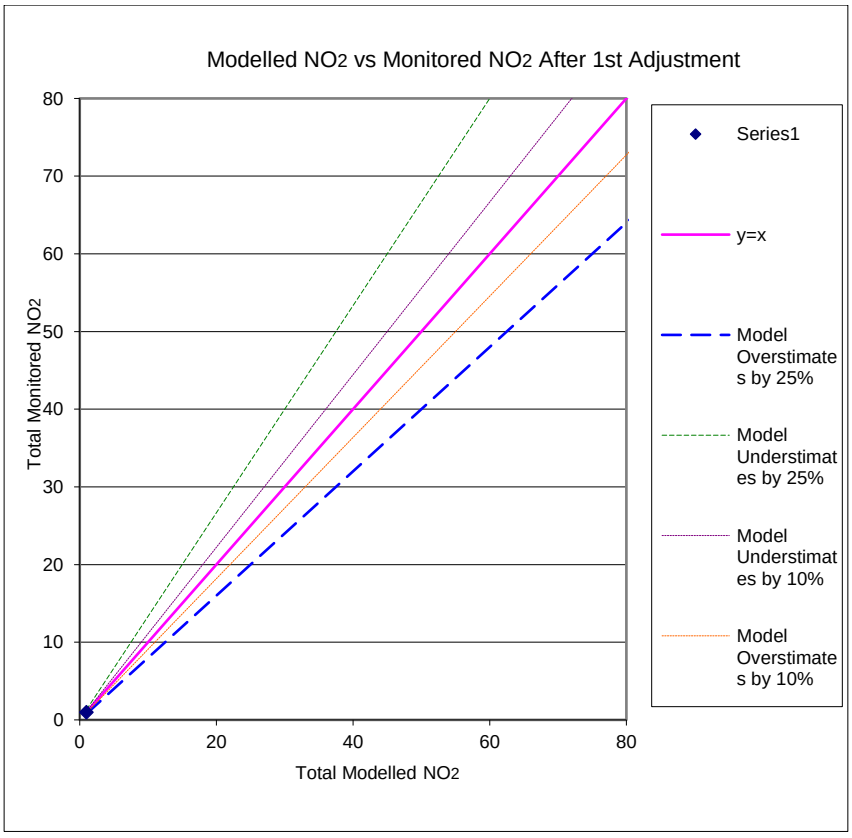


Figure F. 12: Adjusted Modelled NO_2 vs. Monitored NO_2 – Salisbury City Centre AQMAs



Salisbury London Road AQMA

No sites were removed from the verification process. Table F. 16 below shows an initial comparison of the monitored and unverified modelled NO_2 results for the year 2019, in order to determine if verification and adjustment was required.

Table F. 16: Comparison of Unadjusted vs. Monitored NO_2 – Salisbury London Road AQMA

Site ID	Background NO_2 (µg/m^3)	Monitored total NO_2 (µg/m^3)	Modelled total NO_2 (µg/m^3)	% Difference (modelled vs. monitored)
DT71	16.0	39.0	21.9	-43.8
DT65	16.0	51.0	25.3	-50.4
DT66	16.0	37.0	22.5	-39.1
DT73	16.0	29.0	20.5	-29.2
DT72	16.0	32.0	21.0	-34.3

The model was shown to be under predicting at all locations. It is recommended in LAQM.TG(16) that all modelled results are within ±25% threshold of monitored concentrations with a preference for the concentration to be within ±10%. Further model adjustments have been made to obtain closer alignment of the modelled concentrations to the monitored concentrations. Model adjustment is undertaken based on the road NO_x component and not NO_2 so as to not introduce bias toward the background component.

Figure F. 13 shows a scatterplot of the modelled road NO_x concentrations versus monitored road NO_x concentrations, and the trend line based on linear regression passing through zero. The equation of the trend line gives an adjustment factor of 3.8376. This adjustment factor was applied to all modelled road NO_x outputs before conversion of NO_x to NO_2 and the addition of background concentrations.

The adjusted modelled results are summarised in Table F.17 and

Figure F. 14. Post adjustment, all modelled NO_2 concentrations are within the ±25% threshold recommended as being acceptable in LAQM.TG(16), and all of the results are within the desirable ±10%. The adjustment reduces Root Mean Square Error (RMSE) from 16.5 µg/m^3 to 2.6 µg/m^3, and fractional bias from 0.5 to <0.01 indicating that adjusted modelled concentrations show a good agreement with measured values.

Table F.17: Adjusted Road NOx and NO_2 – Salisbury London Road AQMA

Site ID	Ratio of monitored road contribution NO_x / modelled road contribution NO_x	Adjustment factor for modelled road NO_x	Adjusted modelled road contribution NOx ($\mu g/m^3$)	Adjusted Modelled total NO_2 (based upon empirical NOx / NO_2 relationship) ($\mu g/m^3$)	Monitored total NO_2 ($\mu g/m^3$)	% Difference (adjusted modelled NO_2 vs. monitored NO_2)
DT71	-76%	**3.838**	42.6	37.2	39.0	-4.5
DT65	-76%		67.9	48.2	51.0	-5.6
DT66	-71%		47.2	39.3	37.0	6.2
DT73	-66%		32.5	32.5	29.0	12.2
DT72	-70%		36.0	34.2	32.0	6.8

Figure F. 13: Modelled Road NOx vs Monitored Road NOx Before and After Adjustment – Salisbury London Road AQMA

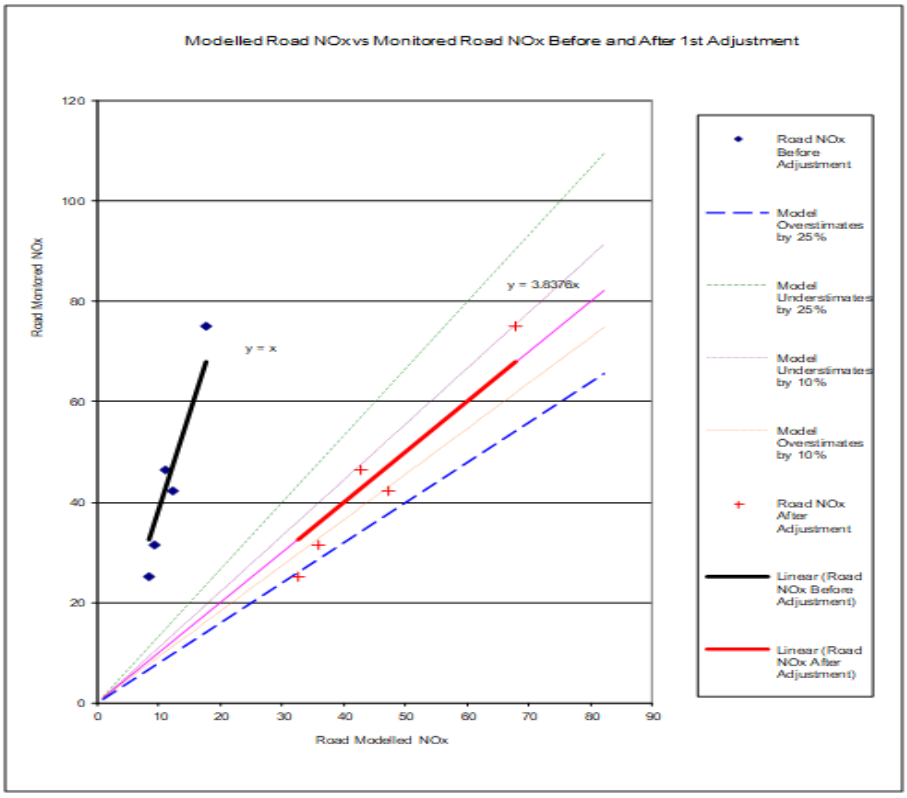
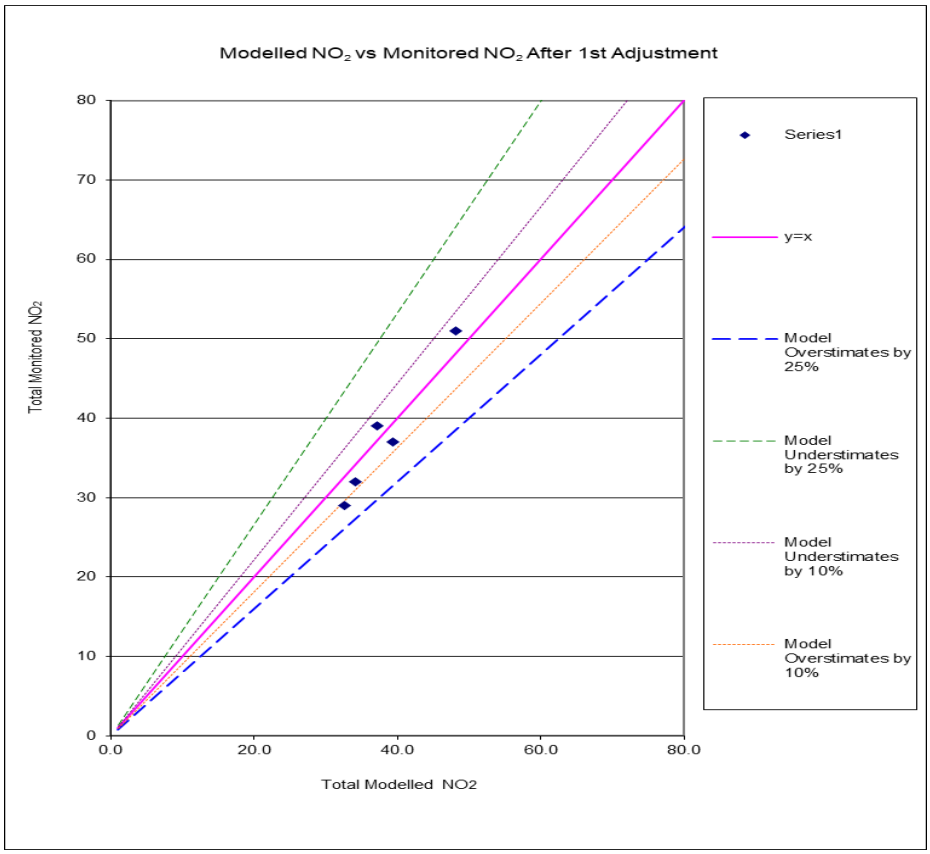


Figure F. 14: Adjusted Modelled NO_2 vs. Monitored NO_2 – Salisbury London Road AQMA



Glossary of Terms

Abbreviation	Description
ADMS	Atmospheric Dispersion Modelling System (Ref. 32)
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
AQO	Air Quality Objective – A legally binding limit value defined within The Air Quality Standards Regulations 2010. The national air quality objective (AQO) limit for nitrogen dioxide is 40 µg NO2/m3 air as an annual mean value.
AQS	Air Quality Strategy (Ref. 9)
ASR	Air quality Annual Status Report (Ref. 8)
CIL	Community Infrastructure Levy
CBA	Cost Benefit Analysis
COMEAP	The Committee on the Medical Effects of Air Pollutants
EFT	Emissions Factor Toolkit v10.1 (Ref. 19)
Defra	Department for Environment, Food and Rural Affairs
EU	European Union
HGV	Heavy Goods Vehicles
LAQM	Local Air Quality Management
LGV	Light Goods Vehicles
LTN	Local Traffic Neighbourhood
LTP3	Local Transport Plan 3 (Ref. 12)
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxides

SPD	Supplementary Planning Document
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
WTM	Wiltshire Transport Model

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Appendix 2 - Air Quality Action Plan Public Consultation Feedback Report - December 2023

Summary

A draft Air Quality Action Plan (AQAP) was produced in July 2023 as part of the Council's duty under the Environment Act 1995 (as amended in 2021). The action plan outlines the actions we will take to improve air quality in Wiltshire between 2024 and 2029.

The Action Plan has been widely consulted on. The first stage of consultation involved collaboration and consultation with relevant council teams such as transport, highways, public health and climate to help shape the action plan. The draft plan went to the Environment & Climate Change Forum in January 2023 to obtain initial public feedback, which led to the development of a non-technical summary to support the full public consultation. In addition, a public consultation was carried out between July and September 2023 with interested local organisations and bodies including the Environment Agency, Defra and Wiltshire residents and local businesses.

What we heard during the public consultation

Consultees were asked the following two questions:

Q1 - To what extent do you agree or disagree that the actions in the draft Air Quality Action Plan (AQAP) will overall deliver the necessary air quality improvements in Wiltshire?

Agree - 19% of respondents agreed with this statement
Disagree - 48% of respondents disagreed with this statement
Neither agree or disagree - 33% of respondents neither agreed or disagreed with this statement

Q2 - Do you have any comments about the overall objectives contained in the AQAP?

The comments questions raised by respondents have been grouped into the following main topics each headed below:

There is little in the way of actual plans and no objectives or action plans that have time delivery that can be monitored and assessed.

We consider that the measures include those set out in table 5-11 represent the outcome of a prolonged period of consultation with key partners to determine their viability. Further details of this process can be found in the section titled 'Development and Implementation'.

The action plan does not consider fine particulates (PM2.5)

PM2.5 is not included within the LAQM framework and there is no duty to monitor in the same way as is required for other pollutants such as nitrogen dioxide and PM10. The action plan is required by the Environment Act to Address breaches of the UK air quality annual mean objective in eight locations in Wiltshire. Boarder objectives are detailed in the Air Quality Strategy for Wiltshire which we plan to review & will include issues such as PM2.5. *Although Pm2.5 concentration are mainly influenced by transboundary sources the council can help to reduce levels within it's control. Examples of this action are inspecting industrial installations via the LAPPC to ensure levels of VOCs meet permit requirements and taking action via Environmental Protection Act 1990 provisions where bonfires are found to be causing a statutory nuisance.*

The monitoring of air quality is not comprehensive enough meaning pollution 'hotspots' are missed. There needs to be more monitoring.

In total we have around 70 monitoring sites spread across Wiltshire comprising a mix of passive diffusion tubes and automatic analysers. The air pollution levels reported are sourced from a combination of our annual status report and ADMS modelling software. The ASR can be downloaded here https://www.wiltshire.gov.uk/article/6472/Air-quality-annual-reports.

There is a lack of detail on how the air quality ADMS modelling works

The AQAP refers to the technical aspects of the ADMS modeling software on page 40 via Reference 32 http://www.cerc.co.uk/environmental-software/ADMS-Roads-model.htm

There should be no idling signage setup in each AQMA and fines handed out to repeat offenders who leave engines idling

THE DFT have advised us on the following in relation to engine idling:

1) *Under Regulation 98 of the Road Vehicles (Construction and Use) Regulations 1986, it is an offence to cause emissions or noise by leaving engines running unnecessarily whilst a vehicle is stationary. These requirements apply when a vehicle is parked at the roadside. Enforcement is carried out by the police. Also, under the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002, local authorities may issue fixed penalty notices for this offence.*
2) *'Switch off engine' signs require DfT authorisation. However, there are strict guidelines on the number, location etc. for authorisation of these signs. These signs are not intended for general use. Applications will only be considered on a site specific basis where there is evidence that engines are habitually left running. We are exploring the option of no idling schemes with colleagues in our highways team.*

We will be exploring schemes targeted at sites and times where unnecessarily idling is known to be a particular problem such as schools at the start and end of the school day, or around areas which are particularly vulnerable to poor air quality.

There needs to be a bypass for Westbury and Salisbury to achieve significant air quality improvements to these towns.

The original AQAP focused on a proposed A350 bypass for Westbury. The cancellation of the bypass in 2009 forced a shift in action planning toward other measures such as promoting cycling and walking within Westbury.

It is recognised that there is a historic and ongoing desire for a Salisbury bypass. The Council supports the principle of a bypass for Salisbury but the strategic need for it will be understood through the Department for Transport / National Highways M4 to Dorset Coast RIS2 (Road Investment Strategy) study 2020-2025. If identified as a need and a priority, the scheme would be progressed through a subsequent round(s) of the RIS and / or through the DfT's Major Road Network / Large Local Majors process and the Western Gateway Sub-national Transport Body. This is unlikely to deliver any improvements in the short to medium term and costs would be well in excess of £100 million.

The council should adopt a ULEZ or clean air zone scheme similar to Bath or Bristol to charge polluting vehicles

The UK Supreme Court ordered the government in 2015 to produce new air quality plans to bring air pollution down to legal levels in the "shortest possible time". Since 2017, the Government has used its powers under the Environment Act 1995 to 'direct' 64 local authorities to produce clean air plans. Clean air zones are often the most effective way to deliver compliance, in the shortest possible time and government funding has been granted to directed local authorities to assist with the setup of these types of schemes. Wiltshire Council was not one of these councils directed by the government to produce clear air plans and therefore plans to seek compliance with legal emissions targets through this updated air quality action plan.

Why is the Westbury incinerator being allowed so close to the Westbury AQMA?

The incinerator planning application was refused by the council; however this decision was subsequently approved by the planning inspector following an appeal. However, the poor air quality in the Westbury AQMA is wholly caused by slow moving traffic (in particular diesel cars) along the A350 between Warminster Road and Haynes Road.

Large scale housebuilding should not be allowed close to AQMAs

A new SPD has been developed alongside this action plan for consultation and adoption by the council. The new SPD compliments core policy 55 of the Core Strategy, establishing a risk rating procedure for proposed sites on the basis of their impact on air quality (including proximity to existing AQMAs) and requires good design along with measures to mitigate/offset impacts of proposals. Provision is made to request financial contributions to assist in the delivery of measures contained within this action plan. This is a new area of work for the council and one we hope help ensure that developments must take into their impact on AQMAs.

The AQAP report is too long and difficult to read

Unfortunately we are unable to change the format of the report as it is a requirement of Defra to structure the report in this way. However, recognising this we have also published a plain english non-technical summary document which can be downloaded on our air quality pages [*https://www.wiltshire.gov.uk/air-quality-reports*](https://www.wiltshire.gov.uk/air-quality-reports)

The pollution limits for nitrogen dioxide are too low at 40 ug/m3. The limits should be redrawn to require levels to be below the latest WHO standards of 10ug/m3.

The Environment Act 1995 (as amended in 2021) and the associated Air Quality (England) Regulations 2000 set the UK framework for local authorities in England. The Regulations specify that the UK air quality annual mean objective for Nitrogen Dioxide is 40 ug/m3.

The air quality measures don't go far enough.

We consider that the measures include those set out in table 5-11 represent the outcome of a prolonged period of consultation with key partners to determine their viability. Further details of this process can be found in the section titled 'Development and Implementation'.

The air quality measures won't work as predicted

The modelled measures have been subject to detailed ADMS Roads dispersion modelling which is the gold standard for air quality predictions. Many of these measures would be subject to detailed feasibility plans prior to their implementation and so the exact detail may change following this.

The proposed one way system at BoA will cause air quality to worsen on new road and Springfield

Monitoring of the areas highlighted took place when the social distancing one way system was in place in 2020/2021 and nitrogen dioxide levels were found to be significantly below the annual objective. The re-implementation of a similar traffic scheme to that of the social distancing scheme would assist in achieving the Bradford-on-Avon air quality objective in the shortest timeframe.

Car parking charges across council owned car parks should be based on vehicle emissions with the most polluting vehicles paying more.

Car parking charges based on emissions was explored at shortlisting stage however this option was ruled out as it was not sufficiently compatible with the policies of the parking service team.

HGVs are more polluting than cars so why do you claim that diesel cars are the most polluting?

The data on traffic emissions for vehicle was obtained using Department for Transport traffic counts, Wiltshire Council's own traffic counts and the source apportionment and emissions factor toolkit methodology https://laqm.defra.gov.uk/wp-content/uploads/2021/11/EFTv11.0-user-guide-v1.0.pdf On a vehicle-by-vehicle basis it is correct that emissions from HGVs are greater than diesel cars. However, the traffic counts confirm that there are significantly more diesel cars on the road than HGVs, and therefore as a collective, diesel cars are significantly more polluting.

What we have done with your suggestions

We have considered all the comments made and modified the plan as appropriate. Following approval by the relevant parties, the adopted AQAP will be subject to a cabinet approval process and progress each year will be reported in the Annual Status Reports, as part of our statutory LAQM duties.

Wiltshire Council

Cabinet

19 March 2024

Subject:	**Update on Community Conversations**
Cabinet Member:	**Cllr Richard Clewer - Leader of the Council and Cabinet Member for Climate Change, MCI, Economic Development, Heritage, Arts, Tourism and Health & Wellbeing**
Key Decision:	**Non-Key**

Executive Summary

As part of Wiltshire Council's commitment to creating stronger communities by empowering the people of Wiltshire to live full, healthy, and enriched lives, the Community Conversations programme was initiated. The intention of the programme is to recognise the inequalities which affect our population and to provide a bold, holistic, and innovative approach to understanding the lived experience of residents across the county, developing new sustainable methods of support, which are based in communities themselves. The programme is in the process of expanding from 2 to 5 communities and is expected to be expanded into further locations in the future.

Proposals

It is recommended that Cabinet note the range of activity underway to support these communities and the ongoing opportunities for community activism and tailored support.

Reason for Proposals

N/A

Terence Herbert
Chief Executive

Wiltshire Council

Cabinet

19 March 2024

Subject: **Update on Community Conversations**

Cabinet Member: **Cllr Richard Clewer - Leader of the Council and Cabinet Member for Climate Change, MCI, Economic Development, Heritage, Arts, Tourism and Health & Wellbeing**

Key Decision: **Non-Key**

Purpose of Report

1. To appraise Cabinet of activity arising from the ongoing pilots of Community Conversations.

Relevance to the Council's Business Plan

2. Creating stronger communities in Wiltshire is Wiltshire Council's vision as defined in the council's Business Plan. Guiding themes in the Business Plan include improving social mobility and tackling inequality. In everything we do, we consider the impact of the action on social mobility and ask how we can help to tackle the disparities in opportunities that exist within Wiltshire.

Background

3. In early 2022, senior leaders from Wiltshire Council, the NHS, Wiltshire OPCC, Selwood Housing Association, and Trowbridge Future undertook community visits to Studley Green in Trowbridge and Bemerton Heath in Salisbury, two areas within Wiltshire identified through the national Indices of Multiple Deprivation to be amongst the six most deprived areas in Wiltshire. The community visits were structured as an initial opportunity for leaders to hear directly from residents and other community representatives, what the lived experience in Wiltshire was for them.

4. The result was the Community Conversations programme, designed to build trust between communities and public sector organisations. Generating fresh insights for supporting residents for whom no individual need is severe enough to qualify for support, but the cumulative amount of need they experience, impacts profoundly on their ability to thrive.

5. Using the vision and principles generated by senior leaders, members of the Transformation Team began a pilot exercise in engaging with the communities of Studley Green and Bemerton Heath in September 2022.

6. Typical concerns raised by residents in Bemerton Heath and Studley Green include:

    a. Anti-social behaviour, particularly from young people and after dark. Residents have also reported a lack of things for young people to do in both areas.

b. Volume of traffic and lack of parking causing damage to grass verges when people park.
c. Uneven pavements and lack of dropped curbs.
d. Littering, particularly around retail units, and of large “bulky waste” type items left in gardens and on the street.
e. Access to high-quality low-cost food.
f. Open drug use, dealing, and commonality of alcohol abuse.
g. Lack of community spaces, events and “things to do”.
h. Insufficient travel options, particularly for small distances and for the elderly.
i. Increasing mental health concerns

7. Both communities also highlighted issues associated with an increase in cost of living, including:

    a. Rising energy costs
    b. Rising food prices
    c. Rising travel costs

8. The Community Conversations approach is related to Asset Based Community Development (ABCD) – making use of what a community already has and using these things to make the area better for the people who live there. This has also been described as ‘using what’s strong to deal with what’s wrong’. Other methodologies are being incorporated into the approach including:

    a. Design Thinking - a problem-solving approach that emphasizes empathy, ideation, and prototyping to create innovative solutions. It involves understanding user needs, brainstorming ideas, and iterating through cycles of testing and refinement.
    b. Critical Systems Heuristics - a framework for analysing complex social systems. It provides a set of heuristics, or rules of thumb, to help individuals and groups critically reflect on and improve their understanding of these systems. It aims to uncover value conflicts, power relations, and ethical considerations within systems to support more informed decision-making and systemic change.
    c. Soft Systems Methodology - an approach to addressing complex, ill-defined problems in human systems. SSM is particularly useful in situations where multiple stakeholders have diverse perspectives. It involves a series of structured steps, including problem exploration, conceptual modelling, and redesigning systems based on a better understanding of the problem context. SSM emphasizes learning, communication, and collaboration to bring about systemic improvements.

9. There are similar pre-existing examples of this type of approach in Wiltshire, including community led action planning using local Joint Strategic Needs Assessments and a Wiltshire Centre for Independent Living ABCD project in Devizes. The community led model for healthier communities in Wiltshire has also been a significant success, recognising that ideas to connect people with sport and physical activity can’t be ‘done to’ communities, they can only ever be ‘created with’. However, these programmes have usually started with an idea already formed as to ‘what’ a community may need within a defined theme, rather than having the ability and support to start with building trust with communities and having an unscripted conversation about what matters most to them where they live. A Community Conversation.

Main Considerations for the Council

Growth of Community Conversations

10. Community Conversations is growing, drawing on what people like about their area, what can make it better, understanding motivations and how people may like to be involved in change. Partners in a range of community groups are already becoming involved in connecting with our communities, including Wiltshire-wide organisations such as the Community Foundation and Wessex Community Action and those involved in the very different local ecosystems of community groups (such as tenant engagement officers, police community support officers, patient participation managers, community venue boards, parish, town and city councils etc). The intention is to generate further interest from the communities, experiment, and prototype ideas for better delivery of support in the short-term and plan a bold movement over the long-term to reduce reliance on council services and resources.

11. The development of a movement for the longer term in the two original areas (Bemerton Heath and Studley Green) has identified shared purpose, values, and experiences in those locations and between stakeholder groups. These will be used as a foundational starting point for an additional 3 – 4 localities in identifying meaningful actions, rewards, and engagement. These need to be supported by sustainable resource, data, communications activity, and organisation over the long term. It involves creating an understanding of how residents perceive their reality, and what can be done with people alongside public service providers to deliver sustainable positive change in improving people's lives.

12. Examples of significant work completed to date include:

    a. Formation of the Bemerton Heath "Bright Ideas" UKSPF panel and receipt of bids for funding for community projects
    b. Creation of Beautiful Bemerton Group
    c. 2 x Public Health Improvement Coach Apprentices – residents of Bemerton Heath recruited to these positions and thriving in their roles.
    d. Other local groups such as Brothers of Bemerton, Grandparent's group and book club.
    e. Formation of the Studley Green "Bright Ideas" UKSPF panel.

- Engagement with Wiltshire Council services through Community Conversations working group, creative workshops, and Heads of Service Whilst the areas of higher deprivation in Wiltshire are those being targeted initially through Community Conversations, there are other communities within Wiltshire that can benefit from the Community Conversation approach who would not naturally show up within the indices of multiple deprivation.
- These include our boater community along the canal, and some smaller very rural settings where deprivation can be hidden amongst more affluent population data. Work has already been carried out by the public health team to start Community Conversations with our residents who live along the canal in boats, and a great deal of trust, relationship building, and evidence collection is already underway amongst this community.
- In addition, a focus on small 'micro-spots' of deprivation in large rural settings has been added to the wider council Community Conversation working groups priorities, and a pilot programme for education and support in areas like this will start during 2024.
- Funding for a community bus which will take residents to Aldi to provide better access to high-quality, low-cost food.

13. Work will expand internally at Wiltshire Council to affect both operational and cultural transformation. This will align services with the Community Conversations approach, amplifying resident voice, and increasing the organisation's capacity as a system leader.

14. Looking to the longer term, we are working closely with our partners in the NHS BSW Integrated Care System and have confirmed priorities for the Wiltshire Integrated Care Alliance that will see the development of 'Neighbourhood Collaboratives' through Primary Care Networks (PCNs).

15. These have developed from a Neighbourhood Focus Site project, and the model supports neighbourhoods (PCN footprints) to establish collaborative groups, working in a population-health management focussed way to make changes aimed at addressing health inequalities.

16. The idea of these Neighbourhood Collaboratives is that:

> *"Wiltshire residents will be able to inform and affect local change to improve services that matter to them; Neighbourhoods are able to work together to identify and reduce health and care gaps by working together without boundaries; and professionals and communities have a way of working together to design and implement solutions to inequality gaps and to work through delivery of key required changes."*

17. The Neighbourhood Collaboratives complements the Community Conversation approach and will support resident's when health or health service-related concerns are raised as a part of Community Conversations. The Health and Wellbeing Board has warmly welcomed the proposals and further background information is available here.

Funding opportunities

18. Whilst the main ethos around Community Conversations is creating trusted relationships and empowering communities to be the change that they require, there are inevitably some costs associated with change in communities that additional funding can be beneficial for. The UK Shared Prosperity Fund (UKSPF) has been made available to Wiltshire through the national UKSPF. This funding amounts to approximately £1,000,000 to be shared between 5 deprived localities in Wiltshire, to be distributed to community projects which improve well-being and/or productivity in that area. The investment plan stipulates that decision-making authority on allocation of funds should be held by a panel of community members. At present, the Community Conversations programme is facilitating the creation of such panels in Studley Green and in Bemerton Heath, where the panel has received its first applications for project funding, which include:

    a. Formation of a slingshot club.
    b. Pump track.
    c. Formation of WI group.
    d. Extension of toddler playgroup.
    e. British sign language training.
    f. SEND garden at Sarum academy.
    g. Request for tools and supplies for an existing arts' club.
    h. Community bus.

i. Disabled access pathway on Pinewood Park.
j. Disabled access pathway on Gainsborough Close community garden.

19. In addition, Wiltshire Council is committing £2m in transformation reserves to fund activity which may not fall under the remit of UKSPF, but which is considered too significant to ignore. It will also be used to resource appropriate facilitative activity within the pilot areas. This includes recruiting 3 additional Community Conversations Leads who will be assigned to new areas in Chippenham, Melksham, and Westbury with a likely start date at the beginning of February. Other resourcing is requested via the Community Conversations working group which acts as a gateway from the programme into the whole organisation. Specific examples of projects/initiatives which have been council funded include:

- Community transport from Bemerton Heath to Salisbury Aldi

Safeguarding Implications

20. Specific consent is sought on a case-by-case as appropriate for participation in Community Conversations.

21. As the programme expands, further detailed advice will be sought from the council's internal safeguarding leads to identify risks and ensure mitigations are considered. This may include appropriate level of safeguarding training for the staff working in the community areas.

Public Health Implications

22. The community conversations and related activity intend to improve social mobility and tackle inequality. This aligns clearly with activity on the social determinants of health.

Procurement Implications

23. Delivery of the delegated funds could be either for the neighbourhood group to determine which measures are to be financially supported and the Council awarding grants and contracts to each delivery organisation; or for the Council to openly select a body to hold delegated funds and award contracts to delivery organisations as determined by neighbourhoods. In Bemerton Heath the panel is developing an approach where Wiltshire Council acts as a procuring agent on behalf of the community panel. If successful it is likely this approach will be adopted in other areas as a best fit to meet the procurement needs of the panels and to ensure compliance with UKSPF reporting requirements.

Equalities Impact of the Proposal

24. Improving social mobility and tackling inequality is a guiding theme for the council's Business Plan. In everything we do, we consider the impact of the action on social mobility and ask how we can help to tackle the disparities in opportunities that exist within Wiltshire. The two pilot, and three subsequently selected, communities were chosen based on their deprivation score according to the Index of Multiple Deprivation (IMD) and with the intention of spreading the approach across communities in multiple towns.

Environmental and Climate Change Considerations

25. At this stage there are no environmental considerations

Workforce Implications

26. Ongoing support for the community conversations is being provided through the council's transformation team working in partnership with representatives of the whole organisation through the Community Conversations working group.

Risks that may arise if the proposed decision and related work is not taken

27. No decision is required to be made, report is for information and update.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

28. No decision is required to be made, report is for information and update.

Financial Implications

29. At this stage there are no direct financial implications for the council. The activity set out is being undertaken through officer time amounting to…

    i. 2 x Grade M Community Conversations Leads (permanent Transformation Team)
    ii. 3 x Grade M Community Conversations Leads (secondment to Transformation Team)

    UKSPF funds deployed to Bemerton Heath and Studley Green amounting to:

    iii. 2 x £187,000 (to be allocated as grant funding for community projects)

Legal Implications

30. There are no legal implications at present but may be arising should the Council inherit any ongoing liabilities from community proposals. The aim is to avoid this happening wherever possible.

Overview and Scrutiny Engagement

31. Aspects of activity set out within this report have been considered by overview and scrutiny. A briefing for HSC Chair members on the impact of community conversations on neighbourhood collaboratives would be welcome.

Options Considered

32. None required, report is for information and update.

Conclusions

33. Wiltshire Council is committed to improving social mobility and tackling inequalities through expansion of the community conversations pilot schemes in Studley Green

and Bemerton Heath to communities in Chippenham, Melksham, and Westbury. Alongside this, insight and learning gained will be used to make tangible changes to Wiltshire Council's internal operating methods service planning approaches to incorporate the key principles of community conversations. We are looking forward to positive change in those areas and expect in due course to adapt and roll this approach out even further elsewhere in Wiltshire.

Stuart Honeyball – Director of Transformation and Business Change

Report Author: Andrew Morrison, Transformation Consultant, Transformation Team
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Appendices

None

Background Papers

None

Wiltshire Council

Cabinet

19 March 2024

Subject:	**The renewal of mail printing and production contract for Revenues and Benefits 2024**
Cabinet Member:	**Cllr Nick Botterill – Cabinet Member for Finance, Development Management, and Strategic Planning**
Key Decision:	**Key**

Executive Summary

The Revenues and Benefits Service is nearing the end of the current contract with their printing provider and need to retender for this service. The cost of production and postage has risen significantly since the original arrangements were put in place and expenditure over the next 5-year period is anticipated to be in the region of £1.75m which requires approval from Cabinet.

Since 2012 the Revenues and Benefits Service at Wiltshire Council has utilised external contractors for the production of council tax bills, business rate bills and notification letters regarding welfare benefits. Whilst significant effort has been made to provide electronic communication, the number of documents produced each year has increased in line with the growth in news homes and businesses. The team currently send in the region of 450,000 items per annum for production and dispatch.

The service is reliant on external providers who offer the agility, precision, economies of scale and postage discounts that cannot be achieved in-house.

Externalising the production of mail has brought efficiencies. The council no longer employ staff to pack envelopes and is not reliant on systems and equipment to print documents in our offices. The majority of documents are sent via an interface to the printing provider, whether that be a batch of 10,000 or a bespoke individual letter.

The provision of a high quality and timely print management service for the Revenue and Benefits Service supports the delivery of its aims and the Council's vision of a being effective and efficient.

Proposals

Cabinet is asked to approve to delegate authority to enter into the contract with the winning provider and any other relevant documentation and decisions required to the Director of Finance and Procurement.

Reason for Proposal

The report explains the reasons for the council to conduct a tender process for the provision of a printing and mailing contract for the Revenues and Benefits Service and to delegate the final decision at the end of the tender process to enter into the contract to the Director of Finance and Procurement.

The Revenues and Benefits Service in Wiltshire manages the administration of council tax for 230,000 households across Wiltshire and is one of the biggest billing authorities in the UK in terms of the number of households who are sent a bill. The service also manages the collection of business rates, income from Business Improvement Districts, the administration of Housing Benefit and assessment of Council Tax Reduction. Each of these services requires the sending of information to the liable household or business or to the individual who qualifies for a welfare benefit.

The quantity of information documents produced at annual billing is in excess of 250,000 items which require printing and dispatch within a three-week window. Each month the service issues bills and adjustment notices, reminders, and summonses in pursuit of payment and the maintenance of records and accounts, equating to a further 200,000 items per annum. The service relies on being able to produce print files and send these securely to an offsite print and mailing company to produce these documents and ensure that they are packaged and dispatched precisely, promptly and in an order (walk-sort) that achieves the greatest discount on postage costs. That the council tax bill has been used to convey information about government schemes, energy rebates for example has meant the inclusion of additional information on or together with council tax bills at short notice, which demonstrates the responsive and supportive relationship that the service is seeking along with the efficient, effective and reliable systems and processes of a specialist provider.

Andy Brown
Deputy Chief Executive and Corporate Director of Resources
Lizzie Watkin
Director of Finance & Procurement (S151 Officer)

Wiltshire Council

Cabinet

19 March 2024

Subject: **The renewal of mail printing and production contract for Revenues and Benefits 2024**

Cabinet Member: **Cllr Nick Botterill – Cabinet Member for Finance, Development Management, and Strategic Planning**

Key Decision: **Key**

Purpose of Report

1. This report sets out the reasons and requirements for securing a reputable company capable of providing a printing and mailing service to deliver the requirements of the Revenues and Benefits Service.

Relevance to the Council's Business Plan

2. Wiltshire Council has an obligation to the wellbeing of the organisation, and the communities we serve to ensure they are able to live a full and rewarding lifestyle and receive the communications required in a protected but chosen, compliant and secure way.

3. Wiltshire Council requires a hybrid print and postal solution to manage the requirement for Revenue and Benefits, as the contract for this service will expire at the end of August 2024.

4. The council's requirement for a hybrid solution, which includes automation such as electronic upload of files and bulk print and postage of bills is a vital part of the organisation and management of the council's funds.

5. Whilst services have moved to electronic methods where possible, there will be an ongoing need for the Revenues and Benefits Service to send large quantities of complex 'paper' documents to households across Wiltshire.

Background

6. The Revenues and Benefits Service has relied on the provision of a print and mail production contract since the creation of the unitary council in 2009, which created the ninth largest billing authority in England. The number of bills and supporting correspondence was too large to be printed and dispatched in house without additional, specialist equipment and the staff needed to manage that equipment.

7. The outsourcing of this function has advantages over an in-house solution. These include capacity, resilience, greater discount and lower cost per item, precision, and

allows focus of professional officer time to focus on the more technical aspects of the service responsibilities.

8. There are risks of an outsourcing approach that include the risk of information being sent to the wrong address and data protection breaches, but this risk exists with an in-house solution. To minimise the number of parties involved with the production and dispatch there is a requirement that the contractor will not sub-contract any of the work; that the contractor will have the capacity and breadth of skills to undertake all aspects of printing and production themselves. We would expect the contractor to operate and share their business Disaster Recovery Plan, demonstrate a high level of expertise concerning the security of data, data exchange and data destruction. We would expect them to operate from a number of sites from which our documents can be produced.

9. Any mistake made by the contractor has the potential to damage the reputation of the authority. There is an expectation that any successful contractor would be able to demonstrate previous experience of working with other Revenues and Benefits Services and explain the measures taken to avoid any type of data breach.

10. Regardless of how efficient a printing service is, the economies of scale it generates or the security with which documents are handled, most of the cost is incurred in postage which cannot be controlled by the contractor. By sorting post in walk sort order and merging it with documents, generates discounts on postage that we could not obtain if we were to manage the process in-house. An example of this benefit is the Economy Access service that offers the delivery of second-class post within 5 days of production at a current cost of £0.495 per item. The standard second-class rate is currently £0.75.

11. The challenge for the service is to reduce the items we send for printing and encourage people to transact with us on-line. Whilst this method is increasing in popularity, the number of households who receive an e-bill rather than a paper bill is fewer than 10,000.

Main Considerations for the Council

12. The outsourcing of mail generated by the Revenues and Benefits Service remains the most practical way of production. Whilst the service will continue to promote on-line services and take all steps to reduce the amount of correspondence issued each year, it is necessary to find a capable and experienced contractor who can meet our requirements.

13. The number of companies who can fulfil the requirements described above is small and niche, therefore reducing the options available to tender to the market.

Consultation and Communication

14. There are no consultation considerations as a result of this report.

Procurement Implications

15. The procurement will be issued using most appropriate procurement route according to the Council's contract procedure rules, UK Procurement regulations, and will follow public procurement principles of value for money, equality of treatment, transparency and proportionality.

Environmental and climate change considerations

16. The service recognises that there is considerable use of natural resources in the production and distribution of correspondence. For these reasons the service has invested in the electronic delivery of bills and some information regarding benefits. As part of this procurement consideration is given to the green credentials of any supplier to ensure that their ethos meets our requirements. Customer portals are available and enable customers to transact with the service electronically, but we must still have a mechanism to manage the production of correspondence in high volumes.

17. Despite efforts to reduce reliance on paper, the council tax bill is a document that is used for other purposes than payment, it is used for identification, and it is required by other councils to prove sole or main residence, and we must therefore provide this facility.

Equalities Impact of the Proposal

18. Customers with a visual impairment and who are subject to a council tax bill are registered as such within the council tax systems. Consequently, suppliers will be expected to produce documents in various formats for those with are known to have a visual impairment. Where instructed there will be a requirement for suppliers to print information in larger font sizes or in formats that suit the needs of the recipient.

Public Health Implications

19. There are no Public Health implications as a result of this report.

Risk Assessment

20. Changing any supplier, specifically a supplier with whom the team have worked for ten years, carries an inherent risk. The risks are varied from data breaches to failure to include vital information within the specification of a document type. (The council tax bill, for example incorporates a variety of variable fields which will require testing prior to production.)

21. The extent of the risk will vary depending on the time available to test the data shared with the winning contractor, the accuracy of the specifications and the ability of the contractor to produce clear and concise correspondence from the specifications.

22. The ability to produce concise and timely documents relies on the secure exchange of information and secure file exchange, which will require the completion of a Data

Protection Impact Assessment (DPIA) and the support of ICT Service to create appropriate methods of data exchange.

23. Each officer currently can send their letters through a secure portal and support from ICT will be needed to install or replicate the current facility and deploy software which will allow staff to work remotely and securely send documents for production without relying on an office-based printer.

Risks that may arise if the proposed decision and related work is not taken.

24. The production and dispatch of correspondence is an expensive and challenging task. Whilst the cost and risk of change is high the service needs to ensure value for money, seeking the most suitably equipped and robust provider. To provide this service in-house is deemed unviable, as set out in the body of the report.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks.

25. The Revenues and Benefits team have a good reputation for delivering change projects. They are suitably equipped and have the skills, knowledge, and experience to adapt and work with a new provider.

Risk	Action to mitigate the risk.
1. Cost	The cost of change will be high and must be offset by a substantial fall in production costs to make the transition worthwhile.
2.Complexity	The templating of documents prior to production will require extensive testing and time will be needed to prior to production to ensure documents are printed correctly. This is mitigated by the timing of the contract change so as to not coincide with the annual billing process.
3. Secure transfer of data	To ensure the secure transfer of information between parties will require involvement by the councils Information Governance and ICT Teams that they are satisfied any supplier can provide policies and assurance of the methods in place to secure the information we share with them.

Financial Implications

26. Since the contract was last tendered in 2017, the costs of postage and production costs have risen sharply. Second-class post has risen by 23% whilst the cost of first-class post has risen by 78.6%. The cost of postage is largely determined by the

Royal Mail and mailing houses agree a discounted postage rate for large volume producers which are then passed to the council. Currently we pay £0.495 postage per item using the cheapest postal rate.

27. Production costs vary depending on the price of paper, which has also increased over the last three years. Despite the benefits and economies of scale already generated by outsourcing print and production, rising postage costs mean that the Revenues and Benefits Service will spend more than £300,000 on the printing and postage of their correspondence in 2023/24.

28. For the duration of the contract, it is expected that costs for printing, production and postage of the 500,000 documents we estimate we will send each year, will exceed £1.5m.

Workforce Implications

29. There are no direct workforce implications as a result of this report..

Legal Implications

30. Any procurement exercise should be conducted in accordance with the requirements set out in Part 10 of the Council's Constitution, the SPH Manual and the Public Contract Regulations (2015). Legal Services will need to be engaged throughout this process, with the relevant legal and procurement advice sought.

31. Wiltshire Council's Legal Services must draft robust legal documentation for this matter. Legal Services will need to be consulted to review the final documentation before execution.

32. Entering any legal documentation for this matter should be in accordance with the Council's requirements as set out in Part 10 of the Council's Constitution and the SPH Manual.

33. Cabinet is requested to delegate authority to enter the contract with the provider and any other relevant documentation and decisions required to the Director of Finance and Procurement.

Overview and Scrutiny

34. Due to a meeting of Overview and Scrutiny Management Committee being cancelled, this report will be considered through discussion with the Chair and Vice-Chair of the Committee, with any comments reported to Cabinet.

Options Considered

35. The options are to remain with the existing provider or test the market and tender for the production and postage of correspondence produced by the council's Revenues and Benefit Service. It is appropriate to test the market for the reasons set out in the report.

Conclusions

36. Whilst customers are migrating to electronic means of information delivery, we must continue to provide printed documentation. The council tax bill can serve several purposes and for some households it may be the only method of communication provided by the council each year. The outsourcing of a print and production contract is the most cost effective and efficient method of ensuring the production of annual bills and benefit notifications which are complex and sensitive documents. The relationship between the council and the printing provider is vital in ensuring a responsive, precise, effective and dynamic service.

Recommendations

37. To ensure this arrangement suits the needs of the service and the council, to ensure we are achieving best value, we need to test the market and tender for the production and postage of correspondence and bills on behalf of the council's Revenues and Benefits Service.

Lizzie Watkin - Director of Finance and Procurement (S151 Officer)
Andy Brown – Deputy Chief Executive and Corporate Director of Resources

Report Author: Ian Brown, Head of Revenues and Benefits
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Appendices
None

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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