



**Wyre Forest**  
District Council

Worcestershire  
**Regulatory Services**

*Supporting and protecting you*



# Air Quality Action Plan

## Appendix A

**In fulfilment of Part IV of the Environment Act 1995**

**Local Air Quality Management**

**2025 - 2030**

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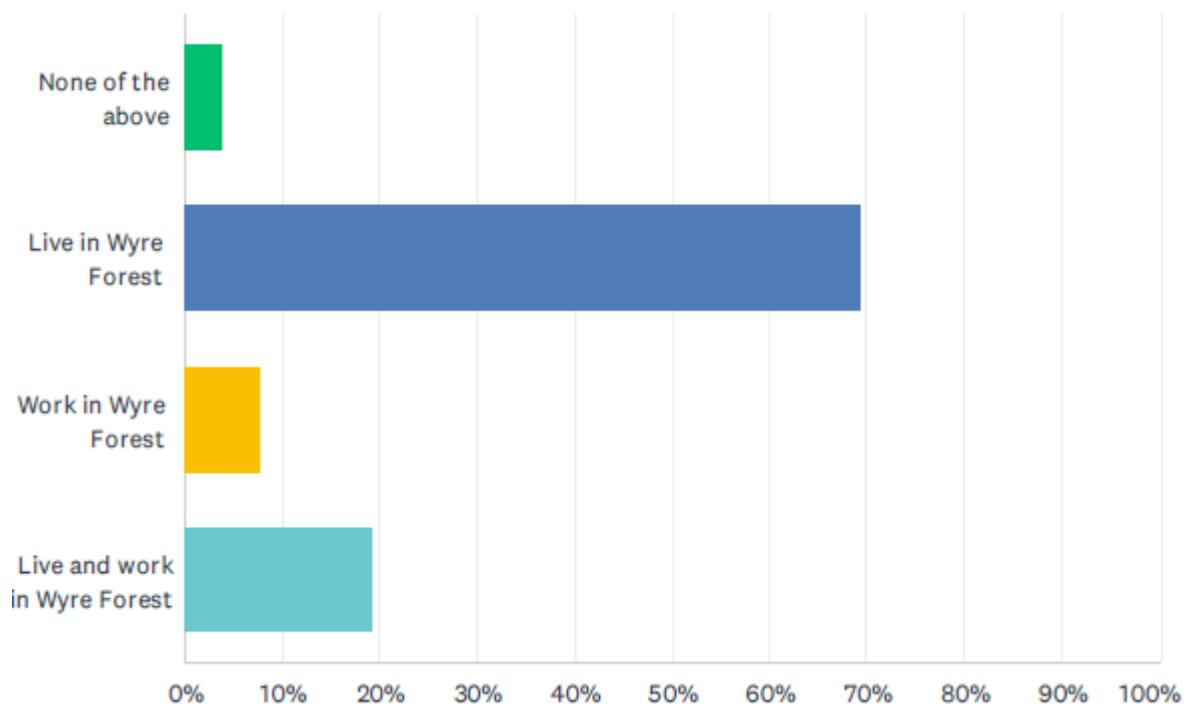
## Appendix A: Response to Consultation

Wyre Forest District Council undertook an online consultation of the Draft AQAP between 18<sup>th</sup> November 2024 and 12<sup>th</sup> January 2025. The consultation was publicised on the council's website and through local and social media. Subscribers of WFDC consultations and surveys newsletter were also invited to take part.

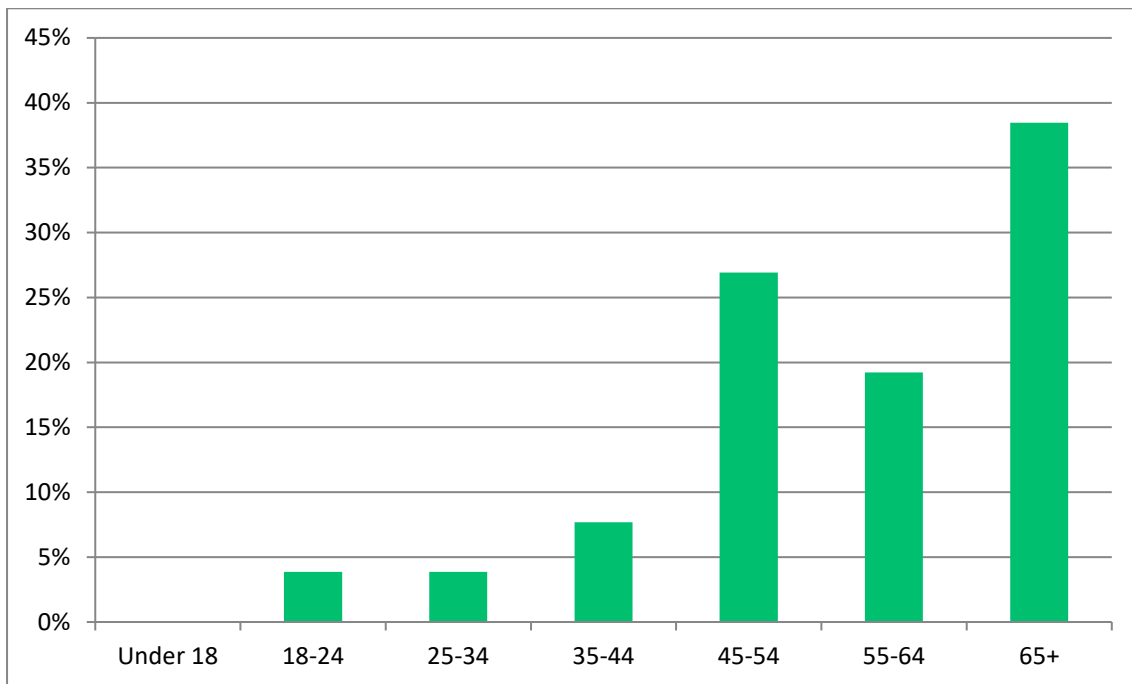
Named statutory consultees, as outlined in section 4.1 of the AQAP, were contacted directly and invited to provide comments via the website or WRS enquiries email. The public were also invited to provide any additional comments via WRS enquiries, detailed in Table A.1 below.

Consultees were asked for their views on the four key priorities for the AQAP and on each of the measures as outlined in section 3.5 and section 5.1 respectively. 26 responses to the consultation were received.

**Figure A.1 Category of respondents to consultation**



No specific responses were received from statutory consultees with the exception of Defra – see below for further information.

**Figure A.2 Age range of respondents**

Respondents were broadly in favour of the key priorities and measures outlined within the plan, responses are summarised in Figures A.3 and A.4 below.

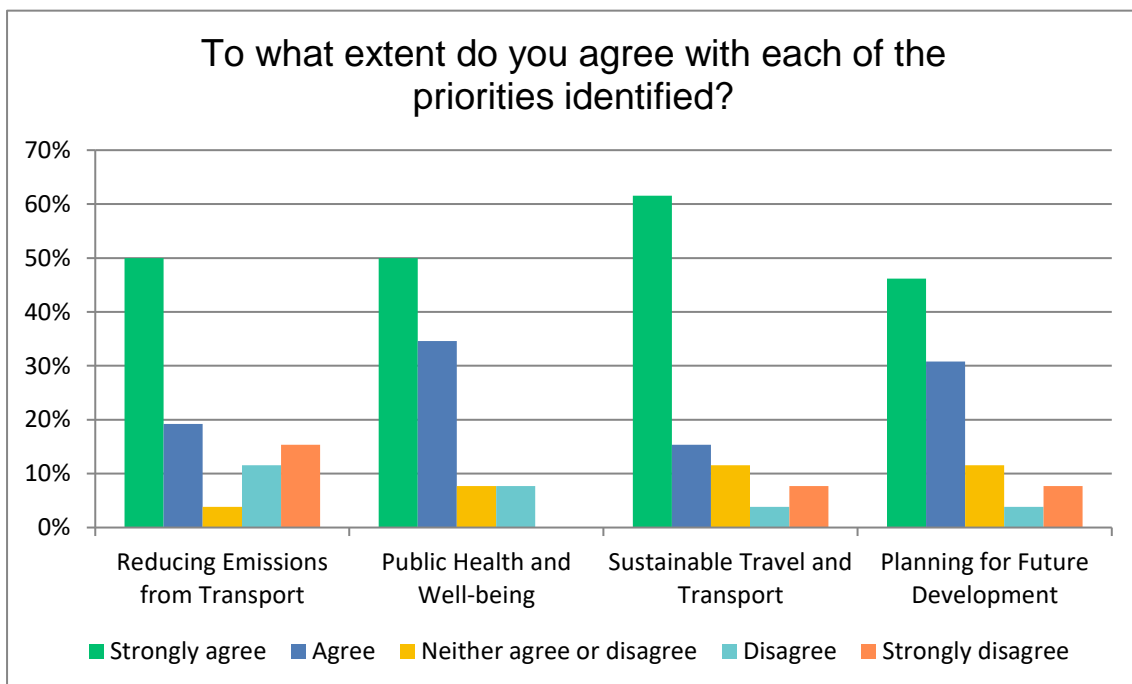
**Figure A.3 Summary of responses on key priorities**

Figure A.4 Summary of responses on AQAP measures

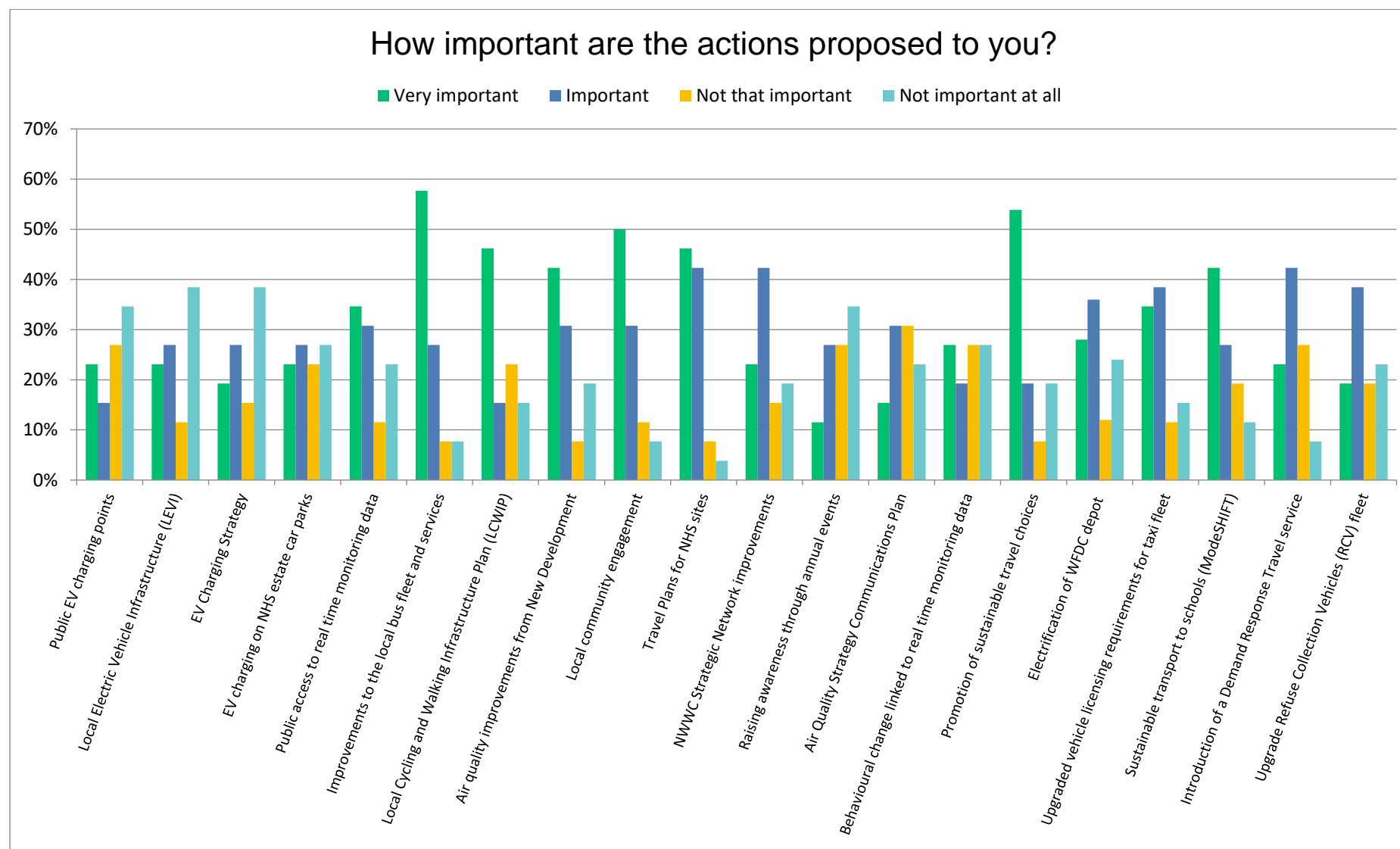


Table A.1 Summary of additional comments received

Category	Comment Summary	Response
Strategic Planning	Stop building more houses. With at [least] 5000 being built, that will be another 10k cars on our getting crowded roads and at least 10-15k increase in population.	The National Planning Policy framework requires the local authority to have a local plan to accommodate growth and achievement of sustainable development. In addition to the actions outlined in section 5 of the AQAP, new development is subject to criteria to minimise impact on air quality, for example installation of EV charging points.
Electric Vehicles	When you see electric cars think toxic bomb car because that is what an electric car is, I don't know the latest figure but last year 750 had burst into flames.	According to motor industry initiative (Nov 2024) by <a href="#">Auto Trader</a> with ChargeUK and the Society of Motor Manufacturers and Traders ( <a href="#">SMMT</a> ) EVs are less likely to catch fire than ICE (conventionally powered) cars.

## Defra Appraisal

The Draft AQAP was submitted to Defra for statutory consultation in accordance with the LAQM requirements. Formal appraisal and approval of the draft AQAP reference: AQAP24-2496 dated November 2024 has been received. Key points from the appraisal and full commentary, and WFDC subsequent actions where required are as follows:

### Key points

- Both [Welch Gate, Bewdley and Horsefair/Coventry Street] AQAPs are currently being retained, which is a decision that is supported by Defra at this juncture.
- The report is well presented and formatted throughout. The AQAP follows the Defra template as existed at the time of publication; however attention is drawn to the fact that a new template was published in September 2024.
- A thorough NO<sub>2</sub> source apportionment exercise has been undertaken, with detail provided in a Technical Appendix.
- Measures have subsequently been developed and short-listed using a two-tier process involving an initial qualitative assessment and a subsequent impact assessment/cost benefit analysis. This process is very thorough, well presented and is considered an example of best practice.
- EV uptake has been projected using NEVIS and DfT data, which are considered robust sources. This focus area is forecast to produce a very large effect.
- The air quality benefits calculated have also been compared to the required reduction in road emissions and it has been concluded the proposed measures are sufficient to achieve compliance in both AQMAs by 2030. Each measure has been described in detail with a full ranking provided in Appendix E. This process is very thorough, well presented and is considered an example of best practice.
- The measures listed are considered appropriate to address the nature of the exceedances within the time frame of the AQAP.
- Appendix F presents the results of an Air Quality Survey. This public engagement is welcomed.

- On the basis of the evidence provided by the local authority the conclusions reached in the report are **accepted** as a draft, however with some comments which must be addressed for the final AQAP to be accepted.

### Commentary

- It is recommended that the Final AQAP is presented using the new template published in September 2024 which contains additional reporting sections, however this is not essential so long as all key information is included, particularly noting the new section 'Maintaining Safe Air Quality', and the text with respect to the anticipated year of compliance, which are both requirements for a Final AQAP to be accepted, as described below.

WFDC response: The Final AQAP has been updated with any additional sections and information required, noting above comments and sections specified.

- Public health impacts have been discussed at the national scale. There would be value in also describing the specific local impacts to public health, for example with reference to the Public Health Outcomes framework. As per section 2.22 of LAQM.TG(22), an estimate of the population within the AQMAs should be provided. The Office for National Statistics provides population data which can be used for this purpose.

WFDC response: No appropriate published local impacts to public health have been identified at this time. It is acknowledged the PHOF does provide an indicator of 'Fraction of mortality attributable to particulate air pollution (new method)'. However as the indicator is focussed on PM<sub>2.5</sub>, it is considered inclusion in this AQAP is not appropriate due to the focus of reducing nitrogen dioxide.

Section 2.2 Public Exposure including population estimation and description of public exposure has been added per revised AQAP template and advice received from LAQM helpdesk.

- Specific detail on how the supporting policies presented are anticipated to contribute towards local air quality improvements would be welcome. A summary of national scale policy of relevant to the AQAP would also more fully round out the consideration of the policy context.

WFDC response: Section 3.2 has been updated to address above comments.



- A source apportionment exercise has been completed in line with LAQM.TG(22). Other sources of emissions beyond roads have not been considered specifically (for example industrial and domestic sources), which may provide additional actionable insights.

WFDC response: Currently WFDC have not identified any appropriate measures to address other sources of emissions that would occur within the lifetime of this AQAP. However, the AQAP will be updated in accordance with the timetable outlined in section 4 with any additional measures that are developed in the future.

- A timetable for updating and revising the AQAP should be set out (this should be as a minimum every 5 years).

WFDC response: Table 4.3 has been added with this information.

- A detailed selection, filtering, quantifying, and costing of actions has been performed resulting in a clearly ranked list of actions that are considered appropriate to address the nature of the exceedances within the time frame of the AQAP. This is commended.
- It is anticipated that compliance will be achieved within the lifetime of the AQMA. Discussion is provided of uncertainty surrounding this prediction, but no date is provided. Recognising that these uncertainties exist, nevertheless **AQAPs must specify the year air quality objectives are expected to be achieved.**

WFDC response: Relevant text from new AQAP template has been added to s4.2.5 and a date of 2030 has been assumed.

- Defra recommends that Directors of Public Health approve AQAPs. Sign off is not a requirement, however collaboration and consultation with those who have responsibility for Public Health is expected to increase support for measures to improve air quality, with co-benefits for all.

WFDC response: Worcestershire DoPH has been consulted on the draft AQAP. The executive summary has been updated with appropriate comments.

- **AQAPs must set out the measures they will take to maintain air quality standards and objectives once they are achieved, as well as achieving them.** It is recommended that consideration is given to this maintenance aspect,

as compliance is anticipated to be achieved within the lifetime of the AQAP.

This would be expected to involve the production of an Air Quality Strategy.

WFDC response: section 5.2 has been added to the AQAP (reflecting s5.3 of new Template) to address above comments.