

CABINET REPORT
2024

10th December

Draft Air Quality Action Plan 2025-2030

Relevant Portfolio Holder	Councillor Kit Taylor
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Judith Willis, Community & Housing
Report Author	Job Title: Adrian Allman Contact email: adrian.allman@worcsregservices.gov.uk Contact Tel: 01562 738064
Wards Affected	All wards
Ward Councillor(s) consulted	N/A
Relevant Council Priority	Environment
Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS

The Cabinet RECOMMEND that:-

- 1.1 the Draft Air Quality Action Plan 2025-2030 is approved;**
- 1.2 a Consultation on the Plan is undertaken for 2 months from Mid-December to February 2025: and**
- 1.3 authority is delegated to the Assistant Director Community & Housing, in consultation with the Portfolio Holder for Planning, Licencing & Worcestershire Regulatory Services, to approve the final Plan following the consultation, and for submission to DEFRA by April 2025.**

2. BACKGROUND

- 2.1 Under section 83(1) the Environment Act 1995, three Air Quality Management Areas have been declared in the District:
 - 2.1.1 Worcester Road declared 24th October 2011
 - 2.1.2 Redditch Road declared 17th February 2010
 - 2.1.3 Lickey End declared 26th July 2001
- 2.2 The declarations were because of breaches of the nitrogen dioxide (NO₂) annual mean value at several hotspot areas. Details of

declaration and plan of the AQMA can be found on the following pages of Worcestershire Regulatory Services (WRS)

website: <https://www.worcsregservices.gov.uk/all-services/pollution/air-quality/air-quality-management-area-declarations/>.

- 2.3 Section 83A of the Environment Act 1995 requires Local Authorities (in response to declaring an AQMA) to prepare a written Air Quality Action Plan (AQAP). This must set out how the local authority and other stakeholders will take the necessary measures to secure the achievement, and maintenance, of air quality standards and objectives in the area to which the plan relates, and must in relation to each measure specify a date by which it will be carried out and how it will be reviewed
- 2.4 In 2013, WRS produced a countywide Air Quality Action Plan (AQAP) for Worcestershire which was adopted by Bromsgrove District Council (WFDC) on 2nd October 2013. WRS have produced two updates to the AQAP, the latest in September 2016. For details of all measures completed, in progress or planned, please refer to the 'Air Quality Action Plan Progress Report for Worcestershire April 2015-2016'. A copy of this, the previous update, and the AQAP, is available to view or download at: <https://www.worcsregservices.gov.uk/all-services/pollution/air-quality/local-air-quality-reporting/bromsgrove-district-council/>
- 2.5 In August 2022, DEFRA published the Local Air Quality Management (LAQM) Statutory Policy Guidance 2022 and introduced a new warning process for overdue AQAPs which came into effect on 30 June 2023. If AQAP submission requirements are missed, the enforcement approach sets out an escalation process, ultimately end as a Section 85 Secretary of State direction to the relevant Local Authority Chief Executive specifying action.
- 2.6 In September 2023 officers contacted DEFRA raising concerns regarding the process and requesting an alternative timetable for submission of AQAPs for four Worcestershire districts including Bromsgrove District Council. A revised timetable for submission of an AQMA was agreed and submission of a final AQAP is due to be submitted by April 2025.
- 2.7 LAQM Technical Guidance (LAQM.TG22) advises local authorities should only consider revocation of AQMAs following five years below the Air Quality Objectives and Standards or three consecutive years of annual mean NO₂ concentrations being lower than 36µg/m³ (i.e. within

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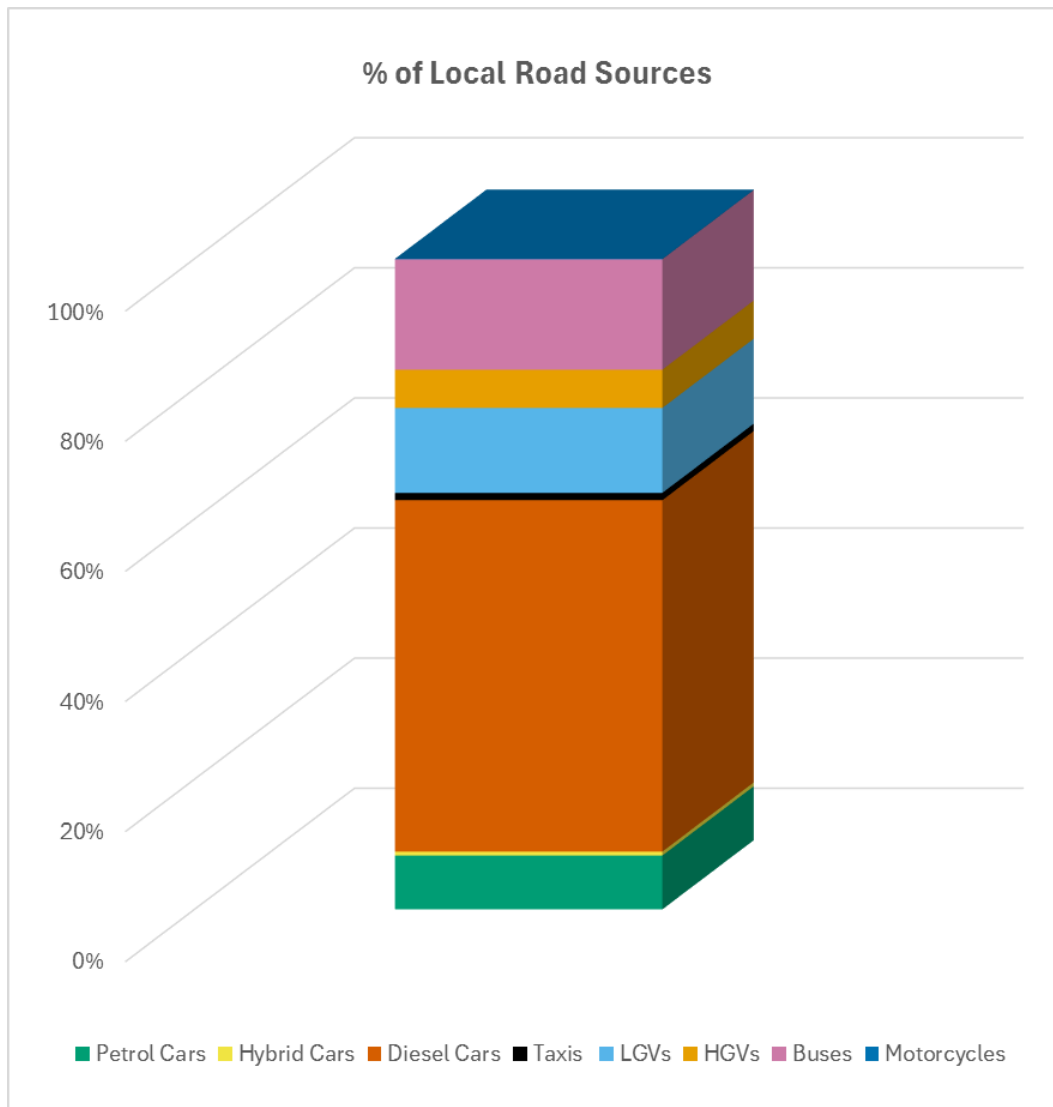
10% of the annual mean NO₂ objective) due to the inherent uncertainty associated with diffusion tube monitoring.

- 2.8 The last exceedance of NO₂ in Worcester Road AQMA was recorded in 2018 but measured concentrations were within 10% of the annual objective in 3 of the last 5 years (the other 2 years, 2020-21, being impacted by the COVID-19 pandemic).
- 2.9 The last exceedance of NO₂ or measured concentrations within 10% of the annual objective within the Redditch Road and Lickey End AQMAs were recorded in 2016. Due to the number of years they have not exceeded the annual objective Bromsgrove District Council are required to undertake the work to revoke both of these AQMAs following completion of this AQAP. Following discussions with the Defra LAQM team in May 2024 it was confirmed an AQAP is required for the Worcester Road, Bromsgrove AQMA only.
- 2.10 In May 2024, a Steering Group consisting of officers from the Council, WRS representatives, Worcestershire County Council (Highways) and NHS was established to consider a range of possible measures that could be undertaken to reduce the levels of nitrogen dioxide.
- 2.11 The highest concentration of NO₂ recorded across the monitoring network in 2023 was 36.6µg/m³ at location WR, 14 Hanover Street, Bromsgrove (within the Worcester Road AQMA). As this was within the 10% of the legal level the Council are required to put in place an Air Quality Action Plan. The required level of reduction for the air quality management area is shown below;

Location	Emission Reductions Required to Meet -10% Objective (NO ₂)	All Vehicle Reduction to Meet - 10% Objective (NO _x)	Highest Roadside Contributor	2nd Roadside Contributor	Single Vehicle Reduction to Achieve Objective
Worcester Road, Bromsgrove	1.58	3.05%	Diesel Cars – 57.08%	LGV – 13.81%	Cars 5% or LGVs/Buses 25%

- 2.12 The data shows the source apportionment for NO₂ and this is shown in the bar chart below:

Local Road NO_x proportions by vehicle type in Worcester Road AQMA



2.13 The plan outlines significant projects that have already had a positive impact on air quality including implementation of the Ultra-Low Emission Taxi Infrastructure Scheme, the A38 Bromsgrove Route Enhancement Programme (BREP) Major Scheme and Strategic Active Travel Network Investment Programme. These are shown in executive summary.

2.14 The Steering Group met over several months to consider what measures could be brought forward to be included in the action plan. The draft Air Quality Action Plan 2025-2030 is shown at Appendix One. These measures are described in section five of the action plan and shown in full in table 5.1 of the action plan. Actions are focussed around four key priorities;

- Priority 1 - Reducing Emissions from Transport

- Priority 2 - Public Health and Well-being
- Priority 3 – Sustainable Travel and Transport
- Priority 4 – Planning for Future Development

2.15 The actions coming out of these priorities include the installation of electric vehicle charge points on council owned car parks, the provision of Local Electric Vehicle Infrastructure (LEVI) for residential off-street parking and wider improvements to the road network, public and active transport.

2.16 Measures have been considered that have subsequently been discounted and these are shown in full in Appendix A of the action plan. The reasons for discounting measures includes that the measure itself won't have a discernible impact on the air quality management area, that the measure hasn't been supported by the relevant organisation, that the measure can't be delivered in the lifetime of the plan or that funding can't be identified at this stage.

2.17 Once the public and DEFRA consultations have been completed, the final Air Quality Action Plan must be updated accordingly and submitted to DEFRA by 1st April 2025.

3. OPERATIONAL ISSUES

3.1 The proposals set out in the Action Plan does not require any further change to operations in the Council. However, any significant deviation from the plan could result in the expected emission reduction targets identified in the plan to be missed.

3.2 Compliance with the Action Plan will be sufficient for the Council to achieve compliance with the National Air Quality Objective for Nitrogen Dioxide emissions.

4. FINANCIAL IMPLICATIONS

4.1 The costs of adopting the plan for the Council have already been identified in the AQAP, with the exception of the potential options for the Council Depots which will be subject to the production of separate business case(s). Other measures have minimal costs and mostly relate to staff time. These will be met by existing budgets.

5. LEGAL IMPLICATIONS

- 5.1 Section 83A of the Environment Act 1995 requires Local Authorities (in response to declaring an AQMA) to prepare a written Air Quality Action Plan (AQAP).

6. OTHER - IMPLICATIONS

Relevant Council Priority

- 6.1 Improving Air Quality will lead to improved health and wellbeing of the population by breathing cleaner and safer Environment and quality of life for all.

Climate Change Implications

- 6.2 Climate change and air pollution are some of the most pressing global challenges of our time. They are also closely related, and there are substantial benefits to tackling both together. By reducing harmful emissions the Council can not only contribute to global efforts to combat climate change but also deliver more immediate local health benefits that come from improved air quality.

- 6.3 Not every climate change measure has a net positive effect on improving air quality and visa versa. The Royal Society have assessed the interaction of these two policy areas in the Policy Briefing paper "Effects of Net Zero and Climate Change on Air Quality" available at <https://royalsociety.org/news-resources/projects/air-quality-climate-change/>

Equalities and Diversity Implications

- 6.4 The AQAP will help to improve equality amongst Bromsgrove residents particularly by tackling areas of poor air quality in Bromsgrove, for example, that have fuel poverty and/or active travel measures.
- 6.5 Targeted actions to improve air quality in areas of social deprivation will have a disproportionately positive health impact. Improving Air Quality will be positive for all, but some of the more vulnerable groups will see added benefit, for example children and adults with underlying cardiovascular health conditions.

7. RISK MANAGEMENT

- 7.1 The Air Quality Action Plan sets out how the Council will achieve compliance with the air quality objectives for Nitrogen Dioxide.

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- 7.2 The Plan will be reviewed for compliance on an annual basis in line with the Statutory Reporting requirements to DEFRA by Worcestershire Regulatory Services in the period May to July each year.

8. APPENDICES and BACKGROUND PAPERS

- 8.1 A copy of the draft Air Quality Action Plan 2025-2029 is attached as Appendix A.

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9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Cllr Kit Taylor, Planning, Licencing & Worcestershire Regulatory Services	25 October 2024
Lead Director / Assistant Director	Judith Wills, Assistant Director Community & Housing Services	25 October 2024
Financial Services	Debra Goodall, Assistant Director Financial & Customer Services	30 October 2024
Legal Services	Claire Felton Assistant Director Legal & Democratic Services	30 October 2024
Policy Team (if equalities implications apply)	Becky Green, Policy Manager	30 October 2024
Climate Change Team (if climate change implications apply)	Matthew Eccles, Climate Change Manager	30 October 2024