Local Authority:	**West Oxfordshire District Council**
Reference:	**AQAP23-1607**
Date of issue	**June 2023**

Air Quality Action Plan Appraisal

The Action Plan sets out information on air quality obtained by the Council as part of the Local Air Quality Management process required under the Environment Act 1995 (as amended by the Environment Act 2021) and subsequent Regulations.

This Appraisal Report covers the Air Quality Action Plan (AQAP) for 2023 – 2028 submitted by West Oxfordshire District Council (WODC) in relation to the Witney Air Quality Management Area (AQMA) declared in 2005 for exceedances of the annual mean NO_2 objective, and works alongside a similar AQAP submitted for the Chipping Norton AQMA at the same time.

The AQAP uses the Defra report template and is concise, well presented and clearly formatted, with some minor exceptions. Additional appendices have also been added, summarising the supporting assessment and modelling work that has been undertaken in development of the AQAP.

With steady improvements having been made to local air quality in recent years, there were no exceedances of the NO_2 annual mean objective in either 2020 or 2021, potentially in part related to COVID-19. However, the 2022 data also indicate no exceedances which would indicate a continuation of this trend beyond the pandemic. The last exceedances were seen in 2019, at two locations within the AQMA. Additional modelling was undertaken of the AQMA in support of this AQAP, using 2019 as a baseline year as a conservative assessment. An additional assessment was also made against the new $PM_{2.5}$ targets within the AQAP as part of Appendix C (which used existing AURN monitoring data to conclude that both targets are likely to be met). The AQAP goes on to set out the public health context, citing the 2019 PHE report.

Several local, regional and national scale policy documents have been referenced in the Plan. At a national scale, the UK Air Quality Strategy, 2019 Clean Air Strategy and the Road to Zero are all cited. Air quality aspects of regional policies have also been outlined in detail. The strategies referenced include the: Oxfordshire County Council Air Quality Strategy (though not yet adopted), the Oxfordshire Local Transport & Connectivity Plan, the Freight and Logistics Strategy, Active Travel Strategy, Connecting Oxfordshire: Local Transport Plan, the Oxfordshire EV Infrastructure Strategy, and the Oxfordshire Energy Strategy.

At a local level, the 2031 Local Plan will be integral to the success of the AQAP. There are seven objectives and four policies within the current Local Plan relevant to air quality, most specifically CO16: Enable improvements in water and air quality. This provides confidence that air quality concerns will be at the forefront of development within the district. Three key developments have also been referenced, which will need to be monitored for their impact on air quality. Further plans included are the 2020 Climate Action Plan, the Climate Change Strategy for West Oxfordshire 2021-2025, the Witney Local Cycling and Walking Infrastructure Plan, the West Oxfordshire Parking Strategy 2016 and the Sustainability Standards Checklist. This comprehensive policy summary section provides confidence that the AQAP is commensurate with existing work in the sector.

Source apportionment of NOx was carried out in 2023 based on 2019 data, considering both total NOx and the sources of road NOx. Based on Defra's background maps, rural contributions make up approximately half the average NOx concentrations, with roads contributing 22%. Domestic and industrial sources are also large contributors. Of the road NOx, cars and LGVs are the most significant contributors, at approximately 50 and 20% respectively. Of those categories, diesels are the higher contributors. Particulate source apportionment is similar in terms of the key contributors, though doesn't exhibit the same weighting toward diesels as emissions are more related to the traffic volume, rather than tailpipe emissions. The background is by far the largest component of particulate concentrations.

The required reduction in NO_2 concentrations to achieve compliance, based on 2019 monitoring, was also calculated in Table 3.8. A maximum reduction of road NOx of 15.2% (at NAS1) was assessed to have been required. Whilst concentrations have reduced since 2019, on that basis, this represents a significant but achievable challenge in achieving compliance with the objective.

Five scenarios for intervention have been modelled, ranging from 5-15% reductions in car traffic, and 5-15% reductions in HGVs. Whilst not explicitly tied to specific AQAP measures, these demonstrate what improvements might be possible if the associated traffic reductions can be achieved through a combination of the AQAP measures. A 15% reduction in car traffic resulted in the largest reductions, with an average percentage concentration change of -5.7% for NO_2, -2% for PM_{10}, and -1.8% for $PM_{2.5}$ across all monitoring sites in Witney in 2019.

The measures have been modelled in this way for the Draft AQAP as transport modelling will be carried out for various schemes considered under Measure 1 Local Transport Plan for Witney, as well as for scheme Measure 4 Shores Green Junction, which is being assessed in the LTP Feasibility Study, which can be modelled at a later date.

The following priorities have been set in the AQAP and help define the measures selected, namely:

- Bringing the Witney AQMA into compliance with the NO_2 annual mean Air Quality Objective;
- Managing $PM_{2.5}$ exposure; and
- Improving accessibility into and around Witney by alternatives to private car – i.e. walking, cycling and public transport.

On an individual measure basis, a total of 37 measures have been taken forward in the Plan. These are generally focused on transport, including the Witney Area Travel Plan, the Witney Local Cycling and Walking Infrastructure Plan and electric vehicle charging infrastructure. HGVs are also targeted, with a freight consolidation centre feasibility study included. Funding has been identified for some of these measures, though the sources are not 100% clear.

Further measures focus on public engagement and awareness. This includes updating information on the website, school travel plans, anti-idling enforcement, air quality planning guidance and the 'Healthy Streets Approach'. Additional measures include looking at domestic burning fuels.

The target reductions of pollution within the AQMA for all measures were not specified, rather a qualitative categorisation of the measures' impacts has been included to indicate which measures are likely to be the most effective.

That said, additional modelling information has been provided in the appendices, most specifically within Appendix E, which presents the baseline and scenario testing results. Impacts on NO_2 incrementally increase in the car reduction scenarios, starting at 2-3% reductions in scenario 1 (5% car reductions) and increasing to 5-6% reductions in scenario 3 (15% car reductions). The HGV reduction scenarios show lesser incremental increases, indicating that this vehicle class is a less significant contributor to total concentrations. At

least one exceedance is seen in all scenarios, though this is based on 2019 data. A similar story is reflected in the PM calculations, though with no exceedances in any scenarios.

Details of the steering group responsible for the AQAP's development have also been provided, with involvement from several WODC departments, and local (parish) and regional (county) Councils and an independent consultant. The group appears to have had close involvement with the development of the actions specifically, but there is little detail on its role through implementation. Detailed minutes of a workshop conducted in February 2023 have been included in Appendix D showing the discussions which have fed into the AQAP's production.

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. Please bear this in mind for the submission of the final AQAP and future iterations.

Overall, the AQAP appears well compiled and is considered commensurate with the concentrations monitored most recently in the AQMA, and is therefore accepted as a Draft. Several aspects can be considered best practice, including the detailed summary of the Steering Group involvement, and the stated intention to retain as an Air Quality Strategy should the AQMA be revoked. That said, improvements can still be made. Specific commentary to inform the final version, and future updates, is provided overleaf.

Local Authority:	**West Oxfordshire District Council**
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Commentary

- There is an opportunity to consolidate this AQAP with the Chipping Norton AQMA, since much of the content is transferable.

Response: This has been actioned.

- It is assumed red text from the template will be replaced within the Final AQAP.

Response: This has been actioned.

- There are cross referencing errors on pages 38 and 40 which should be updated.

Response: This has been actioned.

- The public health context section is fairly limited to generic text. More local context could be provided using the Public Health Outcomes Framework indicator D01. This could be moved from Appendix C.

Response: This has been actioned.

- Some assessment of the impacts of the Local Plan development projections would be beneficial, to ensure that the currently achieved compliance will be maintained given the fairly large developments anticipated.

Response: It is not possible to assess the impacts of the Local Plan at this stage, as it is currently being reviewed to be updated to cover the period up to 2041 (see report section 3.2.3.2). The objectives and policies discussed in the current Local Plan 2031 are therefore potentially subject to change, unless already implemented.

- Whilst source apportionment has been provided for NOx, PM_{10} and $PM_{2.5}$, it would be informative to provide this for NO_2, given the non-linear relationship between this and NOx. This can be done using the methodology in Box 7.5 of LAQM.TG(22), if not modelled.

Response: The source apportionment in its current form provided sufficient information to identify the key emissions sources in the AQMA and quantify the emissions reduction required.

- The required reduction in road NO_x emissions calculations that have been provided could be more explicitly referenced in the measures table. For example, there is no reference to the 15% reductions calculated as being required to achieve compliance, and which of the measures will directly contribute to this, and by how much.

Response: In relation to the 15% reduction required to achieve compliance, the required reduction in road NOx emissions calculations were based on the latest available data not affected by the COVID-19 lockdowns at the time of writing the AQAP: 2019. The now available 2022 monitoring data demonstrates there is no current non-compliance with the annual mean NO_2 AQO. Section 3.4.1.1 of the AQAP has been updated with a paragraph noting this.

As stated in TG22, it is likely that some measures lend themselves to detailed quantifiable analysis in terms of emissions reductions more so than others. It was considered that the measures in the actions table largely did not lend themselves to detailed quantifiable analysis. In most cases, this was due to measures not being sufficiently parameterised to model to quantify an expected emissions reduction. It is acknowledged that TG22 recommends focus on the top three to five measures that provide the most significant impact on emissions. As stated in section 5.1.1, the actions considered to be priority measures were:

- Measure 1: Witney Area Travel Plan
- Measure 2: Witney LCWIP
- Measure 4: Shores Green junction re-routing through-traffic out of the AQMA and onto the A40.

In relation to measure 1, specific traffic management schemes were still under consideration by OCC, and required assessment through traffic modelling, therefore these were not suitable to take forward to air quality modelling at this time. The Witney LCWIP is not suitable to assess quantitively, as it is not possible to accurately predict uptake. The Shores Green junction re-routing through-traffic out of the AQMA and onto the A40 does lend itself to modelling, however, there was no quantified estimated reduction in traffic in the AQMA as a result of the scheme. Therefore, a more generalised approach was taken to understand the impact of reducing the number of cars and HGVs in the AQMA – as summarised in Section 3.4.3.

- The AQAP determines qualitatively that the actions are likely to be effective, but doesn't accurately quantify any of the specific measures' impacts, which would help the reader to understand the relative merits of particular interventions. As per paragraph 2.85 of LAQM.TG(22), an AQAP should contain quantification of the emission impacts of measures as a minimum. This could be aided by dispersion modelling of the detailed measures, as is the stated intention within the AQAP. Once modelling has been completed for the specific measures after transport modelling is available, this should be added to the AQAP.

Response: (copied from second and third paragraphs in above bullet point.)

As TG22 notes, it is likely that some measures lend themselves to detailed quantifiable analysis in terms of emissions reductions more so than others. It was considered that the measures in the actions table largely did not lend themselves to detailed quantifiable analysis. In most cases, this was due to measures not being sufficiently parametised to model to quantify an expected emissions reduction. It is acknowledged that TG22 recommends focus on the top three to five measures that provide the most significant impact on emissions. As stated in section 5, the actions considered to be priority measures were:

- Measure 1: Witney Area Travel Plan
- Measure 2: Witney LCWIP
- Measure 4: Shores Green junction re-routing through-traffic out of the AQMA and onto the A40.

In relation to measure 1, specific traffic management schemes were still under consideration by OCC, and required assessment through traffic modelling, therefore these were not suitable to take forward to air quality modelling at this time. The Witney LCWIP is not suitable to assess quantitively, as it is not possible to accurately predict uptake. The Shores Green junction re-routing through-traffic out of the AQMA and onto the A40 does lend itself to modelling, however, there was no quantified estimated reduction in traffic in the AQMA as a result of the scheme. Therefore, a more generalised approach was taken to understand the impact of reducing the number of cars and HGVs in the AQMA – as summarised in Section 3.4.3.

We note the recommendation for more specific modelling of measures once more specific measures are selected, following OCC's Local Transport Plan feasibility assessment, and this will be considered as an option in the future, depending on available resources.

- The measures table is currently incomplete, full details will need to be provided within the Final AQAP.

Response: This has been actioned.

- With the exception of the first four measures, the measures listed are generally more strategic in nature. Further specific, hyper local measures may bring additional benefits to the AQMA, though it is appreciated that the topography may limit what is achievable.

Response: As discussed in Section 5.1.1, various transport schemes are being considered under Measure 1 Local Transport Plan for Witney, as well as for scheme Measure 4 Shores Green Junction, which are being assessed by OCC in their Local Transport Plan Feasibility Study.

- The development of the measures should give more weight to the source apportionment results, since these calculations are intended to drive the significant sources that should be targeted through action, in order to achieve the greatest improvements. Currently there is limited linkage between the two.

Response: Text added to section 5.1.1 to better explain the linkage between the source apportionment results and measures reads as follows:

"The source apportionment exercise for Witney (as presented in section 3.3) identified that in terms of background concentrations, the largest source of NOx concentrations in the AQMA is rural (53%) (combined naturally occurring NOx and agricultural sources), followed by road transport (22%), domestic (11%), industry (6%) and other (6%).

The source apportionment of NOx concentrations at the monitoring locations in Witney AQMA by vehicle type showed that the greatest contributions came from diesel cars (35-49%), followed by diesel LGVs (15-27%). Rigid HGVs comprised 6-11% of NOx concentrations, petrol cars 5-8%, buses/coaches 0-11%, artic HGVs 2-6%, and petrol LGVs <0.1%.

With these results in mind, it was identified that measures targeting cars, freight, and the general fleet, and domestic sources, would likely have the greatest impact in reducing NOx concentrations in Witney."

- The measures would also benefit from a detailed cost/benefit analysis, as it is currently unclear to the lay person which of the measures will be most cost effective, relative to the pollutant reductions they would achieve.

Response: During the development of the long list of measures, the refining of the short list of measures, and the discussions with the steering group, the following factors were considered as part of a cost-benefit analysis: impact on emissions, social benefits, additional health benefits, additional environmental benefits, estimated financial cost, potential burden on the public, potential burden on businesses. Minutes of the discussions with the steering group are in Appendix D.1.

- The AQAP could also provide more information on the intended funding streams supporting the measures, beyond seeking S106 payments. This would ensure greater confidence that the measures will be implemented.

Response: comment noted.

- The environmental externalities of the measures, such as the impact on climate change, could also be considered. The AQAP starts well in this regard, citing policies which are synergistic, but this isn't carried through to the measures.

Response: Climate change benefits have been considered as additional environmental benefits in development of the long list of measures, the refining of the short list of measures, and the discussion with the steering group. Additionally, there co-benefits in the measures where both air pollution emissions and CO_2 emissions will be reduced. For example, the scenario testing models a reduction in cars and HGVs, which will have a positive impact on carbon emissions.

- Whilst the Steering Group has clearly had a role to play in the development of the AQAP, it is unclear how implementation will be managed. The Steering Group should carry on through implementation, to ensure measures are taken forward effectively. Details of their work could be included within any future versions of the AQAP.

Response: A paragraph subtitled “Future activities” has been added to section 4.2 Steering Group which reads as follows:

“The respective Witney and Chipping Norton Steering Groups will meet on at least an annual basis for the duration of the implementation of this AQAP.

These meetings will include:

- *Reporting back on progress against AQAP measures from responsible owners, including reporting against KPIs, and highlighting any changes to timescales, funding, and barriers to delivery.*
- *Maintain AQAP as a “live” strategy, ensuring measures remain targeted and focused, and introducing new measures as needed.”*

- Whilst it is recognised that this is a Draft and the consultation as not yet been undertaken, please populate Section 4 and Appendix A summarising the responses to consultation. Best practice would involve adding direct cross references to sections in the main document where the comments have been addressed or have affected the content.

Response: This has been actioned.

- Appendix B has also been populated, highlighting measures not taken forward to the AQAP, and the reasons behind these decisions. The main reasons for not taking forward measures are generally political, related to cost or that there was limited feedback on them. These could be revisited through the life of the AQAP, to see whether the landscape has changed, and whether they could then be implemented.

Response: This is noted, and the list will be kept under consideration and revisited where appropriate (e.g. annual Steering Group meetings).

- Appendix E presents only results of the modelling. More details could be provided around the model’s set up and verification, so that the reader can more fully understand the uncertainties associated with the predictions. For example, the modelling does not predict exceedances at NAS1, but does at NAS2, which is the inverse to the monitoring. How has this been accounted for within the measures’ development, if at all, and what is the potential cause of this discrepancy?

Response: The following text regarding the model setup and verification has been added to Appendix E:

"To determine traffic flows and traffic composition across the modelled roads in Witney, traffic count data, traffic models, and speed data were sourced from Oxfordshire County Council and sense checks were made against data from the Department for Transport.

Error! Reference source not found.shows how the model was verified, in line with the Technical Guidance LAQM TG(22), with the use of Defra's NOx to NO2 calculator. To evaluate model performance and uncertainty, the Root Mean Square Error (RMSE) for the observed vs predicted NO_2 annual mean concentrations was calculated, as detailed in TG(22). This guidance indicates that for an annual model, an RMSE of up to 4 µg/m^3 is ideal, and an RMSE of up to 10 µg/m^3 is acceptable. In this case the RMSE value was 3.46 µg/m^3, which shows good agreement between modelled and measured concentrations."

In addition to this text, a table of the model verification was added to Appendix E.

There is a slight discrepancy in the modelling where the model predicts an exceedance as NAS1 and not as NAS2, which is the inverse of the monitoring data. However, both the monitored and modelled NO_2 concentrations for NAS1 and NAS2 are above 10% of the AQO (>36 µg/m^3). Additionally, the model's RMSE is 3.46 and within 10% of the AQO, thereby following the LAQM TG22 Guidance.

Due to their proximity to each other, both being in Bridge Street on the same road link and within a street canyon environment, this discrepancy was likely a result of the available meteorological data for the year 2019, and measures are likely to impact both sites equally in terms of emissions reductions.

- It would also be more informative to project forward the predicted concentrations, given 2019 is now several years ago. This would also demonstrate a more realistic impact, given many won't be fully implemented until at least 2024 now.

Response: A conservative approach was taken to the baseline model based on measured realistic data, rather than adding additional assumptions. For the future modelling scenarios, a conservative approach was also taken. It was anticipated that whilst the fleet mix would improve (new, less polluting vehicles on road), there could be

future increases in the number of vehicles in the fleet, associated with planned developments. Due to the lack of information regarding expected impact of planned developments on the traffic levels in the AQMA, a future scenario could not be accurately estimated. The conservative approach was therefore taken, estimating emissions and concentrations reductions for the baseline year for each modelling scenario.

- The revocation of an AQMA should be considered following three consecutive years of compliance with the relevant objective as evidenced through monitoring. Should the situation of no exceedances continue over five years, local authorities must proceed with plans to revoke the AQMA. The LAQM Technical Guidance 2022 is clear in this respect:

  "There should not be any declared AQMAs for which compliance with the relevant objective has been achieved for a consecutive five-year period." (Point 3.57, page 50).

  AQMAs should identify areas where air quality objectives are not being met or are likely to be at risk of not meeting them. Keeping AQMAs in place longer than required risks diluting their meaning and impacting public trust in LAQM.

Response: this is noted in the AQAP – see section 2.4. The Council are aware of the requirements for revocation, and will keep the monitoring data under review, and continue to consult with and take advice from Defra on the status of the Witney and Chipping Norton AQMAs. It is also noted from TG22 (3.54) that where 2020 is one of many consecutive years of compliance, an AQMA may be considered for revocation. However, as compliance based on diffusion tube monitoring only requires three years of compliance below 10% of the AQO (>36 µg/m^3), and as one of the Witney diffusion tubes remained within 10% of the AQO (>36 µg/m^3) in from 2020 to 2022, it is assumed that the criteria is not yet met for the Witney AQMA to be revoked.

- That said, it is stated within the AQAP that if the AQMA is revoked within the life cycle of this AQAP, the Council will consider retaining an updated version of this Plan to form the basis of a local air quality strategy for the AQMAs (or the wider district) as per paragraph 4.12 of LAQM.PG(22), which would be a requirement if there were to be no AQMAs across the district.

Local Authority:	**West Oxfordshire District Council**
Reference:	**AQAP23-1607**
Date of issue	**June 2023**

Response: This is noted in the AQAP – see section 2.5.

This commentary is not designed to deal with every aspect of the Action Plan. It highlights a number of issues that should help the local authority in maintaining the objectives of its Action Plan, namely the improvement of air quality within the AQMA.

Issues specifically related to this appraisal can be followed up by returning the attached comment form to Defra, Welsh Government, Scottish Government or DOE, as appropriate

For any other queries please contact the Local Air Quality Management Helpdesk:
Telephone: 0800 0327 953
Email: LAQMHelpdesk@bureauveritas.com

Local Authority:	**West Oxfordshire District Council**
Reference:	**AQAP23-1607**
Date of issue	**June 2023**

LAQM Guidance Notes – 2023

Through the Environment Act 2021 and updated Local Air Quality Management Statutory Policy Guidance 2022, the Local Air Quality Management (LAQM) framework has been considerably strengthened. This page highlights some of the changes for delivery to help you prioritise action for improved air quality:

1. Strengthened Criteria for Air Quality Action Plans (AQAPs)

Where a Local Authority is not meeting air quality objectives, they must create an AQAP setting out their intentions to improve air quality in the area. Without current action plans in place, Local Authorities risk negatively impacting their communities by not proactively working to reduce air pollution in the area.

The requirements and guidance around AQAPs were recently strengthened under the Environment Act 2021 and revised LAQM Statutory policy guidance, which Local Authorities must have regard to. The key criteria for action plans are that they:

- Set out the measures they will take to secure the achievement, and maintenance, of air quality standards and objectives;
- Specify a date by which each measure will be carried out; and
- Are revised no later than every five years.

2. New Escalation Process for Reporting

To ensure ASRs and AQAPs are delivered on time, Defra has introduced a new reminder and warning letter system for Local Authorities. This system was set out in the LAQM Statutory Policy Guidance 2022, published on 6 August 2022.

From 30 June 2023, Local Authorities with overdue ASRs and AQAPs will start to receive their first reminder letters. As set out in the Tables 1 and 2 below, if reporting requirements continue to be missed, the matter can be escalated to a Section 85 Secretary of State direction to the relevant Local Authority Chief Executive specifying action.

You are therefore advised to ensure all statutory reporting duties for LAQM are met on time. Please refer to the LAQM Statutory Policy Guidance 2022 for more information.

Local Authority:	**West Oxfordshire District Council**
Reference:	**AQAP23-1607**
Date of issue	**June 2023**

Table 1: Reminder and warning process for ASRs

Timescale	Enforcement	Recipient
Six months before deadline - **January**	**Pre-reminder letter**	From the Air Quality and Industrial Emissions (AQIE) Deputy Director to all local authority Chief Executives and relevant director/s - environment & public health reminding them of LAQM statutory requirements.
Two months before deadline - **April**	**Final pre-reminder letter**	From Defra's LAQM team to all Air Quality officers reminding them of June deadline
One month overdue - **July**	**Reminder letter**	From Defra's LAQM team to Air Quality Officer at non-submitting local authorities
Three months overdue - **September**	**Warning Letter**	From the AQIE Deputy Director to relevant director/s - environment & public health
Four months overdue - **October**	**Final Warning letter**	From the AQIE Deputy Director to relevant director/s - environment & public health
Six months overdue – **December**	**Ministerial letter:** Section 85 direction	Local Authority Chief Executive

Table 2 – Reminder and warning process for AQAPs - Due to be revised at least every five years

Timescale	Enforcement letter	Recipient
AQAP 2 months overdue (e.g.14 months post AQMA designation or 5 years & 2 months since previous AQAP publication)	**Reminder letter**	From Defra's LAQM team to Air Quality Officer at non-compliant Local Authority
AQAP 4 months overdue	**Warning Letter**	From the AQIE Deputy Director to Environment Health / Air Quality Manager at non-compliant Local Authority
AQAP 6 months overdue	**Final Warning letter**	From the AQIE Deputy Director to relevant Director at non-compliant Local Authority
AQAP 8 months overdue	**Ministerial letter**: Section 85 direction	Local Authority Chief Executive

Local Authority:	**West Oxfordshire District Council**
Reference:	**AQAP23-1607**
Date of issue	**June 2023**

3. Public Bodies Required to Contribute to Action Plans

The Environment Act 2021 amended the Environment Act 1995 to increase the number of public bodies that have a duty to co-operate with Local Authorities for LAQM. Air quality partners are certain other public bodies that a Local Authority identifies as having responsibility for a source of emissions contributing to an exceedance of local air quality objectives. This could be a neighbouring authority, National Highways, or the Environment Agency. Once identified, there is a statutory requirement for such public bodies to engage and to contribute actions they will take to secure achievement of the local air quality objective and to maintain achievement thereafter.

All tiers of local Government are also now required by law to collaborate to address exceedances of Air Quality Objectives. County councils, the Mayor of London and combined authorities have similar duties to air quality partners. The difference is that, when requested, they must contribute to an action plan being prepared by a Local Authority, regardless of whether the local authority has identified them as being responsible for a source of emissions.

Under the new legislation, you may choose to request the support of another public body in the development of an AQAP and the same may be requested of your organisation.

Please refer to the LAQM Statutory Policy Guidance 2022 for more information. Should you require further assistance, please contact the LAQM Helpdesk:

Web: http://laqm.defra.gov.uk/helpdesks.html
FAQs: http://laqm.defra.gov.uk/laqm-faqs/
Tel: 0800 032 7953
Email: laqmhelpdesk@uk.bureauveritas.com
The Air Quality Hub also provides free online information and is a knowledge sharing resource for local authority air quality professionals: https://www.airqualityhub.co.uk/

Local Authority:	**West Oxfordshire District Council**
Reference:	**AQAP23-1607**
Date of issue	**June 2023**

Appraisal Response Comment Form

Contact Name:	
Contact Telephone number:	
Contact email address:	UKLAQMAppraisals@aecom.com

Comments on appraisal/Further information:

Local Authority:	**West Oxfordshire District Council**
Reference:	**AQAP23-1608**
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Air Quality Action Plan Appraisal

The Action Plan sets out information on air quality obtained by the Council as part of the Local Air Quality Management process required under the Environment Act 1995 (as amended by the Environment Act 2021) and subsequent Regulations.

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The AQAP uses the Defra report template and is concise, well presented and clearly formatted, with some minor exceptions. Additional appendices have also been added, summarising the supporting assessment and modelling work that has been undertaken in development of the AQAP.

With steady improvements having been made to local air quality in recent years, there were no exceedances of the NO_2 annual mean objective in either 2020 or 2021, potentially in part related to COVID-19. That said, there was a slight increase in 2021 as compared to 2020. However, the 2022 data also indicate no exceedances, so compliance has been maintained coming out of the pandemic. The last exceedance was seen in 2019, at one location within the AQMA (NAS22). This appears to be highly localised however, as according to Figure 2-3, a site virtually opposite (NAS21) monitored less than 20 µg/m^3 in the same year.

Additional modelling was undertaken of the AQMA in support of this AQAP, using 2019 as a baseline year as a conservative assessment. An additional assessment was also made against the new $PM_{2.5}$ targets within the AQAP as part of Appendix C (which used existing AURN monitoring data to conclude that both targets are likely to be met). The AQAP goes on to set out the public health context, citing the 2019 PHE report.

Several local, regional and national scale policy documents have been referenced in the Plan. At a national scale, the UK Air Quality Strategy, 2019 Clean Air Strategy and the Road to Zero are all cited. Air quality aspects of regional policies have been outlined in detail. The strategies referenced include the: Oxfordshire County Council Air Quality Strategy (though not yet adopted), the Oxfordshire Local Transport & Connectivity Plan, the Freight and

Logistics Strategy, Active Travel Strategy, Connecting Oxfordshire: Local Transport Plan, the Oxfordshire EV Infrastructure Strategy, and the Oxfordshire Energy Strategy.

At a local level, the 2031 Local Plan will be integral to the success of the AQAP. There are seven objectives and four policies within the current Local Plan relevant to air quality, most specifically CO16: Enable improvements in water and air quality. This provides confidence that air quality concerns will be at the forefront of development within the district. There is one key development zone in East Chipping Norton, which will need to be monitored for their impact on air quality, particularly as the impacts will be sensitive to the inclusion of a new link road which is left uncertain within the AQAP.

Further plans included are the 2020 Climate Action Plan, the Climate Change Strategy for West Oxfordshire 2021-2025, the Witney Local Cycling and Walking Infrastructure Plan, the West Oxfordshire Parking Strategy 2016 and the Sustainability Standards Checklist. This comprehensive policy summary section provides confidence that the AQAP is commensurate with existing work in the sector.

Source apportionment of NOx was carried out in 2023 based on 2019 data, considering both total NOx and the sources of road NOx. Based on Defra's background maps, rural contributions make up approximately 60% of the average NOx concentrations, with roads contributing 19%. Domestic and industrial sources are also large contributors. Of the road NOx, LGVs are the most significant contributors, at approximately 40-45% of the total. Cars are also significant contributors, at around 25-30% of the total. Of those categories, diesels are the higher contributors. HGVs are also an important contributor.

Particulate source apportionment is similar in terms of the key contributors, though doesn't exhibit the same weighting toward diesels as emissions are more related to the traffic volume, rather than tailpipe emissions. The background is by far the largest component of particulate concentrations.

The required reduction in NO_2 concentrations to achieve compliance, based on 2019 monitoring, was also calculated in Table 3.8. A maximum reduction of road NOx of 12.2% (at NAS22) was assessed to have been required. Whilst concentrations have reduced since 2019, on that basis, this represents a significant but achievable challenge in achieving compliance with the objective.

Five scenarios for intervention have been modelled, ranging from 5-15% reductions in car traffic, and 5-15% reductions in HGVs. Whilst not explicitly tied to specific AQAP measures, these demonstrate what improvements might be possible if the associated traffic reductions can be achieved through a combination of the AQAP measures. A 15% reduction in car traffic resulted in the largest reductions, with an average percentage concentration change of -2.9% for NO_2, -1% for PM_{10}, and -0.9% for $PM_{2.5}$ across all monitoring sites in Chipping Norton in 2019.

The measures have been modelled in this way for the Draft AQAP as transport modelling will be carried out for the scheme considered under Measure 1, the Local Transport Plan for Chipping Norton.

The following priorities have been set in the AQAP and help define the measures selected, namely:

- Bringing the Chipping Norton AQMA into compliance with the NO_2 annual mean Air Quality Objective;
- Managing $PM_{2.5}$ exposure; and
- Improving accessibility into and around Witney by alternatives to private car – i.e. walking, cycling and public transport.

On an individual measure basis, a total of 34 measures have been taken forward in the Plan. These are generally focused on transport, including implementing the West Oxfordshire Area Travel Plan, the Chipping Norton Local Cycling and Walking Infrastructure Plan and electric vehicle charging infrastructure. HGVs are also targeted, with a freight consolidation centre feasibility study included. Funding has been identified for some of these measures, though the sources are not 100% clear.

Further measures focus primarily on public engagement and awareness. This includes updating information on the website, school travel plans, anti-idling enforcement, air quality planning guidance and the ‘Healthy Streets Approach’. Additional measures include looking at domestic burning fuels.

The target reductions of pollution within the AQMA for all measures were not specified, rather a qualitative categorisation of the measures’ impacts has been included to indicate which measures are likely to be the most effective.

That said, additional modelling information has been provided in the appendices, most specifically within Appendix E, which presents the baseline and scenario testing results. Impacts on NO_2 incrementally increase in the car reduction scenarios, starting at 1-2% reductions in scenario 1 (5% car reductions) and increasing to 2-3.5% reductions in scenario 3 (15% car reductions). The HGV reduction scenarios show lesser incremental increases, indicating that this vehicle class is a less significant contributor to total concentrations. At least one exceedance is seen in all scenarios, though this is based on 2019 data. A similar story is reflected in the PM calculations, though with no exceedances in any scenarios.

Details of the steering group responsible for the AQAP's development have also been provided, with involvement from several WODC departments, and local (parish) and regional (county) Councils and an independent consultant. The group appears to have had close involvement with the development of the actions specifically, but there is little detail on its role through implementation. Detailed minutes of a workshop conducted in March 2023 have been included in Appendix E showing the discussions which have fed into the AQAP's production.

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. Please bear this in mind for the submission of the final AQAP and future iterations.

Overall, the AQAP appears well compiled and is considered commensurate with the concentrations monitored most recently in the AQMA, and is therefore accepted as a Draft. Several aspects can be considered best practice, including the detailed summary of the Steering Group involvement, and the stated intention to retain as an Air Quality Strategy should the AQMA be revoked. That said, improvements can still be made. Specific commentary to inform the final version, and future updates, is provided overleaf.

Local Authority:	**West Oxfordshire District Council**
Reference:	**AQAP23-1608**
Date of issue	**June 2023**

Commentary

- There is an opportunity to consolidate this AQAP with the Witney AQMA, since much of the content is transferable.

Response: This has been actioned.

- It is assumed red text from the template will be replaced within the Final AQAP.

Response: This has been actioned.

- There are cross referencing errors on page 13 of the document which should be updated.

Response: This has been actioned.

- There should be more analysis of the apparently highly localised exceedance at NAS22. According to Figure 2-3, the site virtually opposite (NAS21) is 50% lower, so if the AQMA is declared on the basis of something going on at a micro siting scale, this could potentially be readily addressed without wider interventions.

Response: Section 3.3.2 has been updated with the following text:

"There appears to be a highly localised exceedance at NAS22 where NO_2 concentrations exceed 40 µg/m^3, whereas the concentration at the adjacent monitoring site, NAS21, is below 20 µg/m^3. Both the monitored and modelled NO_2 concentrations in 2019 exhibit this pattern.

NAS22 is likely exposed to elevated concentrations as the narrow width of the road results in a more prevalent street canyon effect. NAS21 is located further back from the roadside in a side street outside of the street canyon, allowing greater scope for the dispersion of emissions. It is suggested that additional monitoring sites along Horse Fair could be installed to assess the variation in NO_2 concentrations in this area of exceedance."

- The public health context section is fairly limited to generic text. More local context could be provided using the Public Health Outcomes Framework indicator D01. This could be moved from Appendix D.

Response: This has been actioned.

- A more detailed assessment of the impacts of the Local Plan development projections would be beneficial, to ensure that the currently achieved compliance will be maintained given the fairly large development zone anticipated in East Chipping Norton. This is particularly relevant as the impacts will be sensitive to the inclusion of a new link road as part of this development, which is left uncertain within the AQAP. Whilst listed as being beneficial if this road is included, if it is not, presumably there will be significant adverse impacts.

Response: Comment noted.

- Whilst source apportionment has been provided for NOx, PM_{10} and $PM_{2.5}$, it would be informative to provide this for NO_2, given the non-linear relationship between this and NOx. This can be done using the methodology in Box 7.5 of LAQM.TG(22), if not modelled.

Response: The source apportionment in its current form provided sufficient information to identify the key emissions sources in the AQMA and quantify the emissions reduction required.

- The inclusion of NAS16 in Figures 3-3 – 3-5 is potentially misleading, given it is showing a different analysis to the other sites. If this is a background site, then a source apportionment showing road NOx is not really required. Likewise including this within the measures' analysis potentially skews this.

Response: NAS16 has been considered as a background site and has not been included in the road NOx source apportionment, as indicated by the NA values in Tables 3-3 to 3-5 and as explained in Section 3.3.2, "For the monitoring site where local modelling data was not available (NAS16), no source apportionment of road NOx has been calculated because it is classified as an urban background site. Here, a simplified source apportionment was performed based solely on the Defra background maps (e.g. % background and % road contributions)."

- The required reduction in road NO_x emissions calculations that have been provided could be more explicitly referenced in the measures table. For example, there is no

reference to the 12% reductions calculated as being required to achieve compliance, and which of the measures will directly contribute to this, and by how much.

Response: In relation to the 12% reduction required to achieve compliance, the required reduction in road NOx emissions calculations were based on the latest available data not affected by the COVID-19 lockdowns at the time of writing the AQAP: 2019. The now available 2022 monitoring data demonstrates that there is no current non-compliance with the annual mean NO_2 AQO. Section 3.4.1.2 of the AQAP has been updated with a paragraph noting this.

As stated in TG22, it is likely that some measures lend themselves to detailed quantifiable analysis in terms of emissions reductions more than others. It was considered that the measures in the actions table largely did not lend themselves to detailed quantifiable analysis. In most cases, this was due to the measures not being sufficiently parameterised to model / quantify an expected emissions reduction. It is acknowledged that TG22 recommends focus on the top three to five measures that provide the most significant impact on emissions. As stated in section 5.1.2, the actions considered to be priority measures were:

- Measure 1: West Oxfordshire Area Travel Plan.

  Transport modelling will be carried out for various schemes considered under the West Oxfordshire Area Travel Plan, which is under development by OCC. It is anticipated that transport modelling may be conducted for interventions considered for Chipping Norton as part of this plan. A likely outcome of transport modelling is estimated % reduction in vehicles in the AQMA. These could then be linked to the air quality modelling scenario of those % reductions at a later date.

- Measure 2: Chipping Norton LCWIP.

  Air quality modelling cannot be carried out because the uptake of cycling and walking and the modal shift from private car is very difficult to quantify. However, should the reduction in number of cars in the AQMA be estimated through development or implementation of the LCWIP, this could be linked to an air quality modelling scenario as presented in Section 3.4 at a later date.

- Measure 21: Develop and promote appropriate HGV route map.

  It is anticipated that better routing of HGVs, in addition to other measures which will be delivered or introduced through the OCC Freight and Logistics Strategy 2022-2056, may result in reduced HGV numbers in the Chipping Norton AQMA. The exact reduction is unknown at this point, but if known at a later date, this could be linked to the air quality modelling for 5%, 10% and 15% less HGVs.

- Measure 24: Improve availability of rapid and ultra-rapid EV charging on and near the strategic road network and important link roads across Oxfordshire.

  This will effectively reduce numbers of cars on the road (replacing petrol and diesel cars with electric effectively removed NOx and NO_2 emissions, though not non-exhaust PM_{10} and $PM_{2.5}$). Again, it is currently not possible to quantify the exact reduction as it will be dependent on the rate of EV uptake. If the exact reduction in petrol/diesel cars through replacement with EVs is known at a later date, this could be linked to the air quality modelling for 5%, 10% and 15% fewer cars.

- The AQAP determines qualitatively that the actions are likely to be effective but doesn't accurately quantify any of the specific measures' impacts, which would help the reader to understand the relative merits of particular interventions. As per paragraph 2.85 of LAQM.TG(22), an AQAP should contain quantification of the emission impacts of measures as a minimum. This could be aided by dispersion modelling of the detailed measures, as is the stated intention within the AQAP. Once specific modelling has been completed measure 1 after transport modelling is available, this should be added to the AQAP.

Response: please see the above response.

We note the recommendation for more specific modelling of measures once more specific measures are selected, following OCC's Local Transport Plan feasibility assessment, and this will be considered as an option in the future, depending on available resources.

- The measures table is currently incomplete, full details will need to be provided within the Final AQAP.

Response: This has been actioned.

- With the exception of the first three measures, the measures listed are generally more strategic in nature. Further specific, hyper local measures may bring additional benefits to the AQMA, especially given the 2019 monitored and modelled exceedances occur at only one location.

Response: As discussed in Section 5.1.2, various schemes are being considered under Measure 2 Chipping Norton Local Cycling and Walking Infrastructure Plan (LCWIP), as well as Measures 18 and 19 relating to bus services within Chipping Norton area.

Some hyper local measures, for example “Parking management and enforcement to reduce and restrict car parking availability” and “Consider removing or limiting to disabled-only parking near diff tube 22” under Traffic Management were suggested but rejected, as stated in Appendix B.2.

- The development of the measures should give more weight to the source apportionment results, since these calculations are intended to drive the significant sources that should be targeted through action, in order to achieve the greatest improvements. Currently there is limited linkage between the two.

Response: Text added to section 5.1.2 to better explain the linkage between the source apportionment results and measures. Reads as follows:

“The source apportionment exercise for Chipping Norton (as presented in section 3.3) identified that in terms of background concentrations, the largest source of NOx concentrations in the AQMA is rural (60%) (combined naturally occurring NOx and agricultural sources), followed by road transport (19%), domestic (9%), industry (6%) and other (4%).

The source apportionment of NOx concentrations at the monitoring locations in Chipping Norton AQMA by vehicle type showed that the greatest contributions came from diesel LGVs (41-45%), followed by diesel cars (19-26%). rigid HGVs comprised 9-10% of NOx concentrations, petrol cars 3-4%, artic HGVs 1-3%, buses/coaches 1%, and petrol LGVs 0.1%.

Diesel LGVs contributed the largest proportion of NOx emissions within Chipping Norton AQMA. However, it was difficult to get support or suggestions for actions to address diesel LGVs beyond the existing measures from the OCC freight strategy. With this in mind, it was identified that measures targeting cars, freight, and the general fleet, and domestic sources, would likely have the greatest impact in reducing NOx concentrations in Chipping Norton."

- The measures would also benefit from a detailed cost/benefit analysis, as it is currently unclear to the lay person which of the measures will be most cost effective, relative to the pollutant reductions they would achieve.

Response: During the development of the long list of measures, the refining of the short list of measures, and the discussions with the steering group, the following factors were considered as part of a cost-benefit analysis: impact on emissions, social benefits, additional health benefits, additional environmental benefits, estimated financial cost, potential burden on the public, potential burden on businesses. Minutes of the discussions with the steering group are detailed in Appendix D.

- The AQAP could also provide more information on the intended funding streams supporting the measures, beyond seeking S106 payments. This would ensure greater confidence that the measures will be implemented.

Response: comment noted.

- The environmental externalities of the measures, such as the impact on climate change, could also be considered. The AQAP starts well in this regard, citing policies which are synergistic, but this isn't carried through to the measures.

Response: Climate change benefits have been considered as additional environmental benefits in development of the long list of measures, the refining of the short list of measures, and the discussion with the steering group. Additionally, there are some co-benefits of the measures where both air pollution emissions and CO_2 emissions will be reduced. For example, the scenario testing models a reduction in cars and HGVs, which will have a positive impact on carbon emissions.

- Whilst the Steering Group has clearly had a role to play in the development of the AQAP, it is unclear how implementation will be managed. The Steering Group

should carry on through implementation, to ensure measures are taken forward effectively. Details of their work could be included within any future versions of the AQAP.

Response: A paragraph subtitled “Future activities” has been added to section 4.2 Steering Group which reads as follows:

“The respective Witney and Chipping Norton Steering Groups will meet on at least an annual basis for the duration of the implementation of this AQAP.

These meetings will include:

- Reporting back on progress against AQAP measures from responsible owners, including reporting against KPIs, and highlighting any changes to timescales, funding, and barriers to delivery.

- Maintain AQAP as a “live” strategy, ensuring measures remain targeted and focused, and introducing new measures as needed.”

- Whilst it is recognised that this is a Draft and the consultation as not yet been undertaken, please populate Section 4 and Appendix A summarising the responses to consultation. Best practice would involve adding direct cross references to sections in the main document where the comments have been addressed or have affected the content.

Response: This has been actioned.

- Appendix B has also been populated, highlighting measures not taken forward to the AQAP, and the reasons behind these decisions. The main reasons for not taking forward measures are generally a lack of relevance, related to cost or that there was limited feedback on them. These could be revisited through the life of the AQAP, to see whether the landscape has changed, and whether they could then be implemented.

Response: This is noted, and the list will be kept under consideration and revisited where appropriate (e.g. annual Steering Group meetings).

- Appendix C presents only results of the modelling. More details could be provided around the model's set up and verification, so that the reader can more fully understand the uncertainties associated with the predictions. For example, are the large differences in NO_2 concentrations at NAS21 and NAS22 (which have been replicated in the modelling) explained by meteorology alone, or are there other factors contributing to this?

Response: The following text regarding the model setup and verification has been added to Appendix E:

"To determine traffic flows and traffic composition across the modelled roads in Chipping Norton, traffic count and speed data was sourced from Oxfordshire County Council and sense checks were made against data from the Department for Transport.

Error! Reference source not found. shows how the model was verified, in line with the Technical Guidance LAQM TG(22), with the use of Defra's NOx to NO2 calculator. To evaluate model performance and uncertainty, the Root Mean Square Error (RMSE) for the observed vs predicted NO_2 annual mean concentrations was calculated, as detailed in TG(22). This guidance indicates that for an annual model, an RMSE of up to 4 $\mu g/m^3$ is ideal, and an RMSE of up to 10 $\mu g/m^3$ is acceptable. In this case the RMSE value was 2.41 $\mu g/m^3$, which shows good agreement between modelled and measured concentrations.

In addition to this text, a table of the model verification was added to Appendix E.

The large differences in NO_2 concentrations at NAS21 and NAS22 are seen in both the monitored and modelled concentrations from 2019. Discussion of these differences has been added to Section 3.3.2.

"There appears to be a highly localised exceedance at NAS22 where NO_2 concentrations exceed 40 $\mu g/m^3$, whereas the concentration at the adjacent monitoring site, NAS21, is below 20 $\mu g/m^3$. Both the monitored and modelled NO_2 concentrations in 2019 exhibit this pattern.

NAS22 is likely exposed to elevated concentrations as the narrow width of the road results in a more prevalent street canyon effect. NAS21 is located further back from the roadside in a side street outside of the street canyon, allowing greater scope for the

dispersion of emissions. It is suggested that additional monitoring sites along Horse Fair could be installed to assess the variation in NO_2 concentrations in this area of exceedance."

- It would also be more informative to project forward the predicted concentrations, given 2019 is now several years ago. This would also demonstrate a more realistic impact, given many won't be fully implemented until at least 2024 now.

Response: A conservative approach was taken to the baseline model based on measured realistic data, rather than adding additional assumptions. For the future modelling scenarios, a conservative approach was also taken. It was anticipated that whilst the fleet mix would improve (new, less polluting vehicles on road), there could be future increases in the number of vehicles in the fleet, associated with planned developments. Due to the lack of information regarding expected impact of planned developments on the traffic levels in the AQMA, a future scenario could not be accurately estimated. The conservative approach was therefore taken, estimating emissions and concentrations reductions for the baseline year for each modelling scenario.

- The revocation of an AQMA should be considered following three consecutive years of compliance with the relevant objective as evidenced through monitoring. Should the situation of no exceedances continue over five years, local authorities must proceed with plans to revoke the AQMA. The LAQM Technical Guidance 2022 is clear in this respect:

  "There should not be any declared AQMAs for which compliance with the relevant objective has been achieved for a consecutive five-year period." (Point 3.57, page 50).

  AQMAs should identify areas where air quality objectives are not being met or are likely to be at risk of not meeting them. Keeping AQMAs in place longer than required risks diluting their meaning and impacting public trust in LAQM.

Response: this is noted in the AQAP – see section 2.4. The Council are aware of the requirements for revocation, and will keep the monitoring data under review, and continue to consult with and take advice from Defra on the status of the Witney and Chipping Norton AQMAs. It is also noted from TG22 (3.54) that where 2020 is one of

many consecutive years of compliance, an AQMA may be considered for revocation. However, as compliance based on diffusion tube monitoring requires three years of compliance below 10% of the AQO (>36 µg/m^3), and one of the Chipping Norton diffusion tubes remained within 10% of the AQO (>36 µg/m^3) in from 2020 to 2022, it is assumed that the criteria is not yet met for the Chipping Norton AQMA to be revoked.

- That said, it is stated within the AQAP that if the AQMA is revoked within the life cycle of this AQAP, the Council will consider retaining an updated version of this Plan to form the basis of a local air quality strategy for the AQMAs (or the wider district) as per paragraph 4.12 of LAQM.PG(22), which would be a requirement if there were to be no AQMAs across the district.

Response: This is included in the AQAP – see section 2.5.

This commentary is not designed to deal with every aspect of the Action Plan. It highlights a number of issues that should help the local authority in maintaining the objectives of its Action Plan, namely the improvement of air quality within the AQMA.

Issues specifically related to this appraisal can be followed up by returning the attached comment form to Defra, Welsh Government, Scottish Government or DOE, as appropriate

For any other queries please contact the Local Air Quality Management Helpdesk:
Telephone: 0800 0327 953
Email: LAQMHelpdesk@bureauveritas.com

Local Authority:	**West Oxfordshire District Council**
Reference:	**AQAP23-1608**
Date of issue	**June 2023**

LAQM Guidance Notes – 2023

Through the Environment Act 2021 and updated Local Air Quality Management Statutory Policy Guidance 2022, the Local Air Quality Management (LAQM) framework has been considerably strengthened. This page highlights some of the changes for delivery to help you prioritise action for improved air quality:

1. Strengthened Criteria for Air Quality Action Plans (AQAPs)

Where a Local Authority is not meeting air quality objectives, they must create an AQAP setting out their intentions to improve air quality in the area. Without current action plans in place, Local Authorities risk negatively impacting their communities by not proactively working to reduce air pollution in the area.

The requirements and guidance around AQAPs were recently strengthened under the Environment Act 2021 and revised LAQM Statutory policy guidance, which Local Authorities must have regard to. The key criteria for action plans are that they:

- Set out the measures they will take to secure the achievement, and maintenance, of air quality standards and objectives;
- Specify a date by which each measure will be carried out; and
- Are revised no later than every five years.

2. New Escalation Process for Reporting

To ensure ASRs and AQAPs are delivered on time, Defra has introduced a new reminder and warning letter system for Local Authorities. This system was set out in the LAQM Statutory Policy Guidance 2022, published on 6 August 2022.

From 30 June 2023, Local Authorities with overdue ASRs and AQAPs will start to receive their first reminder letters. As set out in the Tables 1 and 2 below, if reporting requirements continue to be missed, the matter can be escalated to a Section 85 Secretary of State direction to the relevant Local Authority Chief Executive specifying action.

You are therefore advised to ensure all statutory reporting duties for LAQM are met on time. Please refer to the LAQM Statutory Policy Guidance 2022 for more information.

Local Authority:	**West Oxfordshire District Council**
Reference:	**AQAP23-1608**
Date of issue	**June 2023**

Table 1: Reminder and warning process for ASRs

Timescale	Enforcement	Recipient
Six months before deadline - **January**	**Pre-reminder letter**	From the Air Quality and Industrial Emissions (AQIE) Deputy Director to all local authority Chief Executives and relevant director/s - environment & public health reminding them of LAQM statutory requirements.
Two months before deadline - **April**	**Final pre-reminder letter**	From Defra's LAQM team to all Air Quality officers reminding them of June deadline
One month overdue - **July**	**Reminder letter**	From Defra's LAQM team to Air Quality Officer at non-submitting local authorities
Three months overdue - **September**	**Warning Letter**	From the AQIE Deputy Director to relevant director/s - environment & public health
Four months overdue - **October**	**Final Warning letter**	From the AQIE Deputy Director to relevant director/s - environment & public health
Six months overdue – **December**	**Ministerial letter:** Section 85 direction	Local Authority Chief Executive

Table 2 – Reminder and warning process for AQAPs - Due to be revised at least every five years

Timescale	Enforcement letter	Recipient
AQAP 2 months overdue (e.g.14 months post AQMA designation or 5 years & 2 months since previous AQAP publication)	**Reminder letter**	From Defra's LAQM team to Air Quality Officer at non-compliant Local Authority
AQAP 4 months overdue	**Warning Letter**	From the AQIE Deputy Director to Environment Health / Air Quality Manager at non-compliant Local Authority
AQAP 6 months overdue	**Final Warning letter**	From the AQIE Deputy Director to relevant Director at non-compliant Local Authority
AQAP 8 months overdue	**Ministerial letter**: Section 85 direction	Local Authority Chief Executive

Local Authority:	**West Oxfordshire District Council**
Reference:	**AQAP23-1608**
Date of issue	**June 2023**

3. Public Bodies Required to Contribute to Action Plans

The Environment Act 2021 amended the Environment Act 1995 to increase the number of public bodies that have a duty to co-operate with Local Authorities for LAQM. Air quality partners are certain other public bodies that a Local Authority identifies as having responsibility for a source of emissions contributing to an exceedance of local air quality objectives. This could be a neighbouring authority, National Highways, or the Environment Agency. Once identified, there is a statutory requirement for such public bodies to engage and to contribute actions they will take to secure achievement of the local air quality objective and to maintain achievement thereafter.

All tiers of local Government are also now required by law to collaborate to address exceedances of Air Quality Objectives. County councils, the Mayor of London and combined authorities have similar duties to air quality partners. The difference is that, when requested, they must contribute to an action plan being prepared by a Local Authority, regardless of whether the local authority has identified them as being responsible for a source of emissions.

Under the new legislation, you may choose to request the support of another public body in the development of an AQAP and the same may be requested of your organisation.

Please refer to the LAQM Statutory Policy Guidance 2022 for more information. Should you require further assistance, please contact the LAQM Helpdesk:

Web: http://laqm.defra.gov.uk/helpdesks.html
FAQs: http://laqm.defra.gov.uk/laqm-faqs/
Tel: 0800 032 7953
Email: laqmhelpdesk@uk.bureauveritas.com
The Air Quality Hub also provides free online information and is a knowledge sharing resource for local authority air quality professionals: https://www.airqualityhub.co.uk/

Local Authority:	**West Oxfordshire District Council**
Reference:	**AQAP23-1608**
Date of issue	**June 2023**

Appraisal Response Comment Form

Contact Name:	
Contact Telephone number:	
Contact email address:	UKLAQMAppraisals@aecom.com

Comments on appraisal/Further information: