

Shrewsbury Air Quality Action Plan

Public Consultation Report

October 2024



1 Background and Methods

The Air Quality Action Plans (AQAPs) were developed following the establishment of Air Quality Management Areas (AQMAs) near Shrewsbury's Railway Station and along Pound Street in Bridgnorth, due to nitrogen dioxide (NO₂) levels surpassing national standards.

The draft AQAPs include a summary of:

- The current air quality situation
- Sources of pollution
- An assessment of the reductions required
- Details of the key priorities and actions

The actions cover a range of areas such as traffic management, sustainable transport, public awareness, and planning policies. The draft AQAPs also provide an estimate of the cost and benefit of each proposed measure, as well as the expected timescale for achieving compliance with the air quality objectives.

The Shrewsbury draft AQAP mainly considers the predicted effect of existing plans that are either already progressing (e.g. Castle Foregate Gyratory) or plans that have already been approved (e.g. The North West Relief Road), as well as additional actions such as anti-idling measures. The forecast suggests that by undertaking the recommended initiatives, the desired outcomes should be achieved by the year 2025. However, if these actions are not implemented and only national measures are pursued, it is anticipated that compliance will be attained by 2029.

Residents and businesses were invited to share their views on the proposed measures to improve air quality in Shrewsbury and Bridgnorth through an online consultation that included the plans for both towns. However, reporting on the survey results are separated by town. This present report focuses on the results pertaining to Shrewsbury's AQAP.

The online survey ran on the council's Get Involved pages from 31st July through 12th September 2024 and were publicised through Shropshire Council's newsroom. Quantitative results of the survey are displayed below where appropriate as figures. Qualitative responses were analysed for common themes, which are presented where appropriate in Tables, with examples illustrating the common themes anonymised and provided as quotes.

This report proceeds in the following sections:

- **Section 1: Background and Methods** (this section) provides an overview of Shropshire Council's AQAPs, a summary of the specific actions for Shrewsbury, and a brief description of the methods employed in analysing the results of the consultation.
- **Section 2: Respondents** presents the number and types of responses to the consultation received from the online survey, as well as identifying demographic characteristics of respondents.

- **Section 3: Satisfaction with Plans** presents the results of respondents' reported satisfaction with the plans and details responses to open-ended question about what they like and don't like about the plans.
- **Section 4: Additional Feedback** discusses the analysis of feedback received on the impacts of the proposals for people with protected characteristics as well as alternative suggestions offered by respondents. It also contains summaries of the letters received in response to the consultation.
- **Section 5: Summary and Conclusion** provides brief summary and conclusion based on the overall analysis of the feedback received.

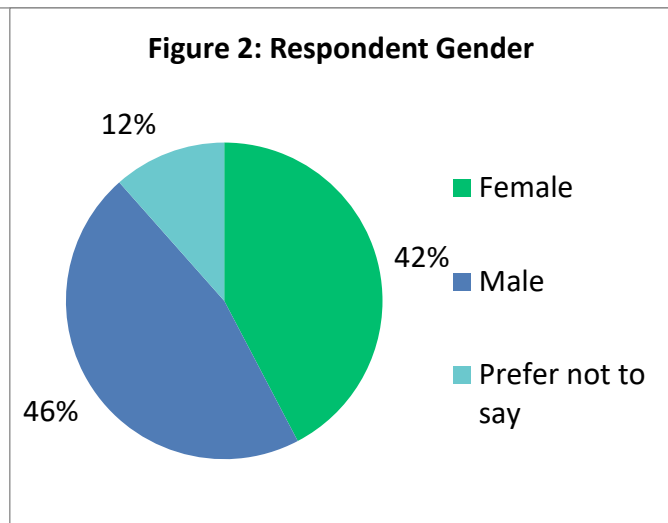
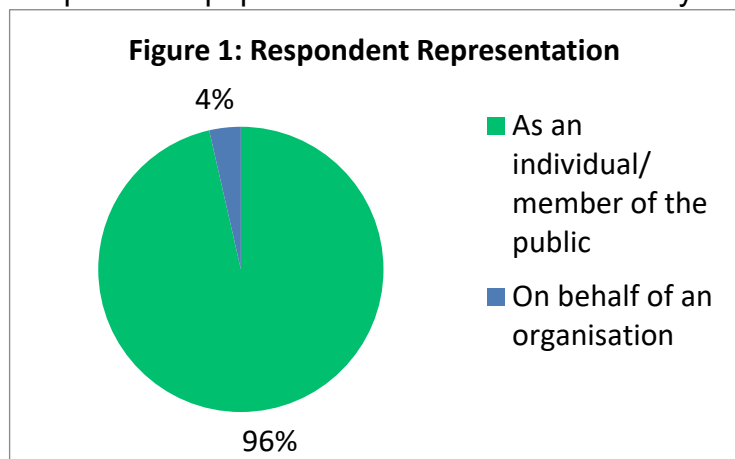
2 Respondents

Respondents were invited to answer questions about both the Shrewsbury and the Bridgnorth plans, and some chose to comment on both plans, so this section includes data on the demographic makeup of all survey responses. While 56 respondents answered the survey, only about 25 chose to answer the optional demographic questions. These questions are asked in order to gauge whether the survey reached a representative sample of the populations that will be affected by the proposals.

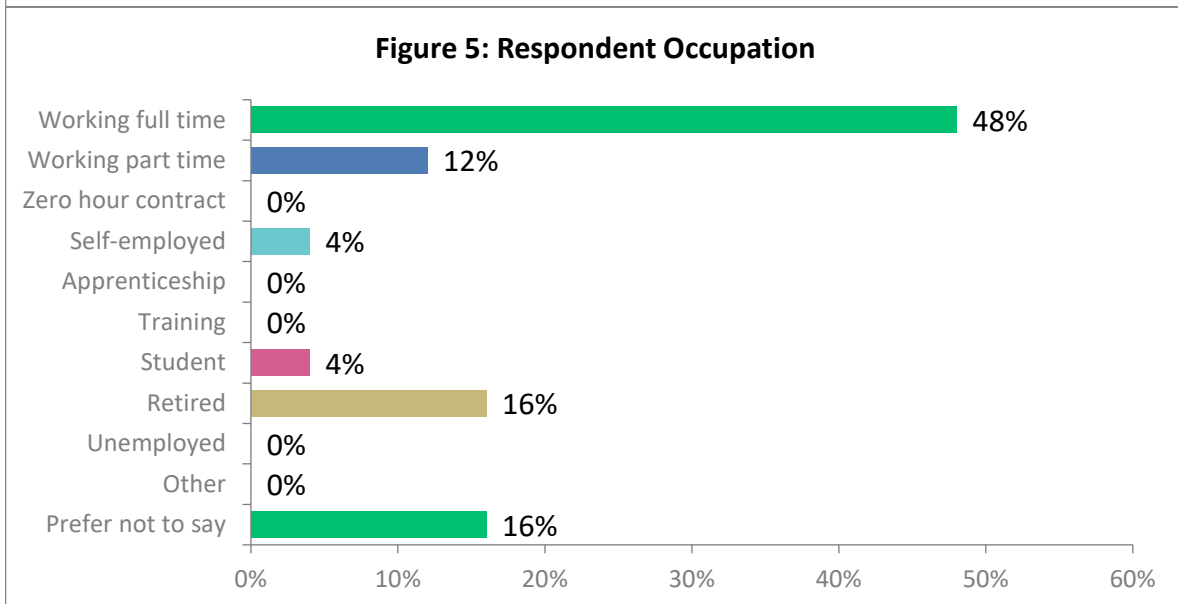
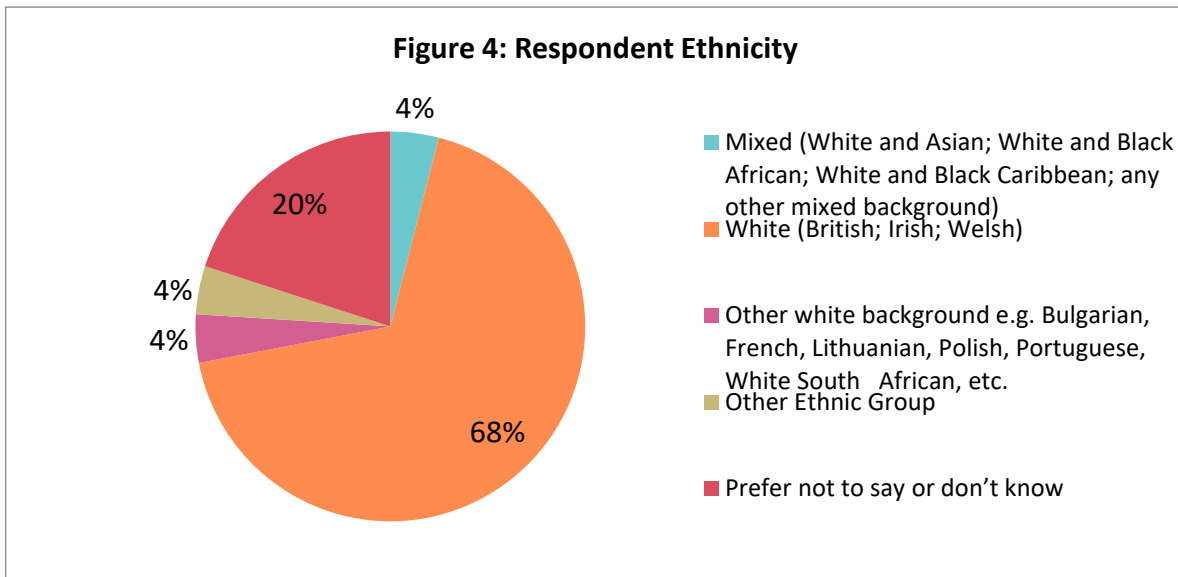
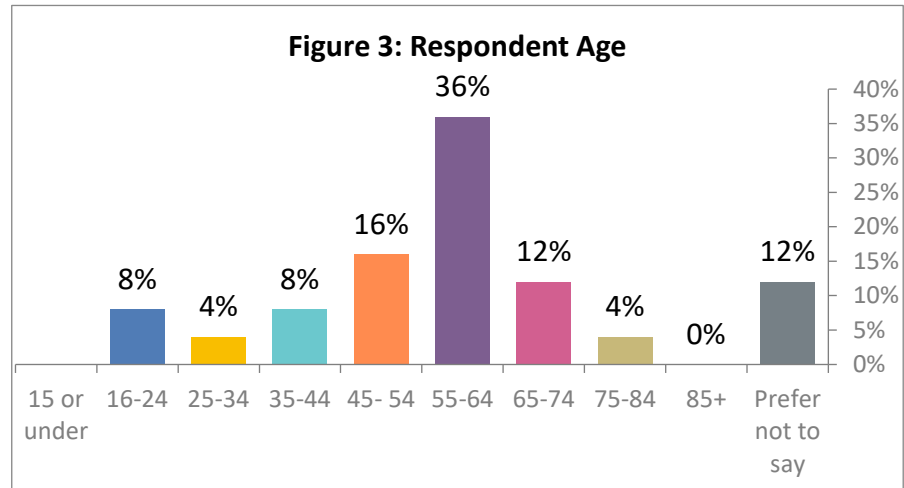
Overall, most respondents were answering as individual members of the public (**see Figure 1**). Only two respondents indicated that they were answering the survey on behalf of organisations. Both of these respondents said that they were representing a business. One of the respondents represented a business in the Shrewsbury area, and the other did not indicate their location.

More respondents identified as male than female, though 12% preferred not to provide their gender (**see Figure 2**). Though "Other (e.g. prefer to self-describe)" was offered as an option, no respondents identified in this way.

The ages reported by respondents (only 25 answered this question) were fairly well distributed, with the largest percentage of respondents between 55-64 years old (**see Figure 3, below**).



Most respondents answering the demographic questions indicated that they are of White (British; Irish; Welsh) ethnicity, though three respondents said they were from different ethnic backgrounds (see **Figure 4**).



A majority of respondents answering the demographic questions indicated that they are working either full-time or part-time (see **Figure 5**), which is consistent with the average respondent age range reported in **Figure 3**.

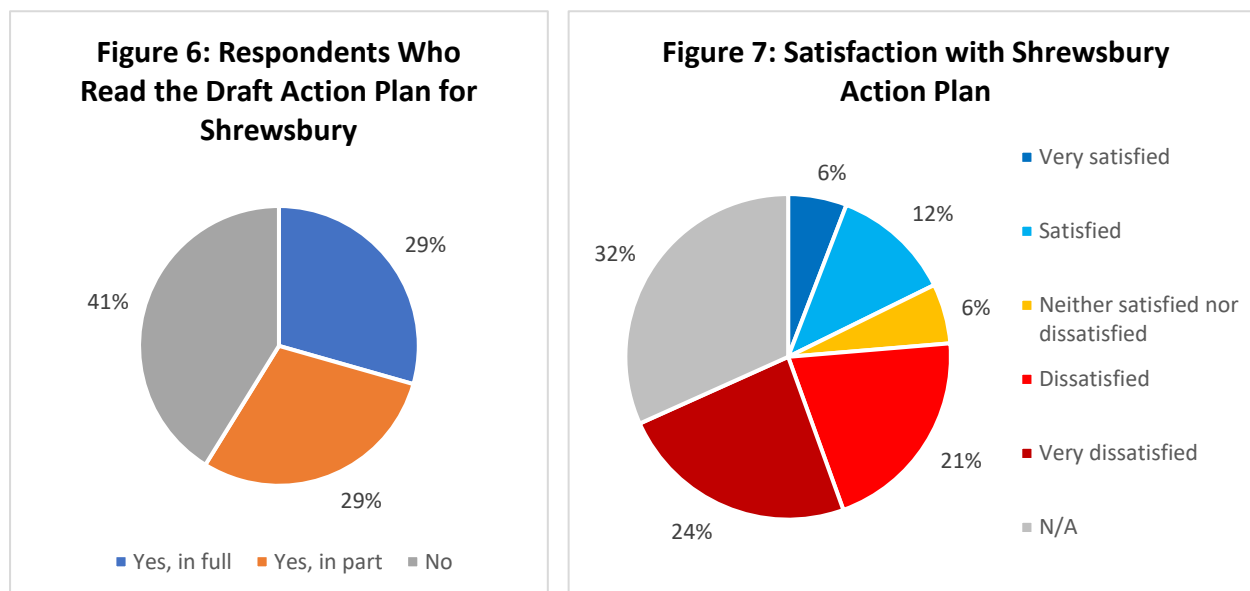
In terms of responses from people with other protected characteristics, three respondents indicated that they have a long-term disability or illness, one indicated that they are a family member of a serving member of the armed forces, and six respondents indicated that they are Christian, while the remaining respondents indicated that they are of no religion or preferred not to say.

Overall, it is necessary to say that the response rate for this survey was low in comparison with the populations of the large towns to which the action plans pertain. However, it seems that the length of the consultation and the promotion of the consultation were adequate so that those interested in the plans had the opportunity to have their say in the time and manner provided to them. The demographic representation therefore appears to be sufficient for the purposes of representing the public interest in these plans.

3 Satisfaction with Plans

Respondents were first asked whether they had read the draft action plan for Shrewsbury. 34 respondents answered this question, and a majority of respondents (58%) said they had read the plan either in part or in full (see Figure 6).

Satisfaction with the Shrewsbury Air Quality Action Plan was mixed, but more respondents were dissatisfied or very dissatisfied with the plan (45%) than were satisfied or very satisfied with it (18%) (see Figure 7).



Respondents were next asked to provide detailed comments on what they liked about the proposals, what they didn't like, and to make suggestions about what could be improved. 12 respondents left comments about what they "liked" about the proposals, though a few of these were actually comments about what they didn't like, and so these comments are covered next.

The following comments represent what people said they **liked** about the proposals:

- “It is commendable that the air quality is now being looked at in certain areas of the town.”
- “Change buses to electric.”
- “Really we need to improve public transport in and into Shrewsbury.”
- “At least it's an attempt to tackle a serious problem.”
- “Idea of electric buses.”
- “Traffic easing within Shrewsbury town centre. Reliable public transport.”
- “Enhancements to existing road junctions to improve traffic flow.”
- “Improved park and ride.”

In addition to the few negative comments left in response to the question about what respondents liked about the proposals, there were 15 responses to the question about what respondents didn't like about the Shrewsbury action plan. The following comments represent excerpts from what people said they **didn't like** about the proposals and are roughly grouped according to some of the themes that emerged in the analysis of responses to this question.

Many of these comments focused on the **impacts of increased traffic and the need for improving public transportation or encouraging more active travel** as a solution to the problem. For example:

- “Doesn't seem to address the poor public transport into town, or round the town. This would reduce the numbers of cars. Hoping it DOES address safe walking and cycling.”
- “Pushing public to use park & ride, when bus service should be to all the surrounding villages and regular times 7 days a week and till late in the evenings... thus encouraging no driving to park & ride. People can get to and from work and people can go out into town on an evening. Brings more money into the town!”
- “It's too roads based.”
- “The longitudinal impacts of a lack of vision for a significant shift away from cars needs quantifying and qualifying.”
- “The cars are bad policies just destroy towns and this failing idea keeps killing off towns.”
- “Do not punish those of us who work in town, can walk to work and operate form a 400 year old building. This is far better than these new build out of town locations where need to travel to.”
- “We need to keep pedestrian crossings unless you actually want more road accidents! If we are to encourage active travel, this includes walking and means we need to protect the best direct walking routes to the town centre not make everyone walk further to find a safe place to cross the road.”

Other respondents **worried about the impacts of the plans on business or expressed concerns about increases in parking charges**. For example:

- “It is so anti-business and rewards those who have move to out of town locations increasing the need to travel. It will increase overall pollution so now need to travel to Meole Brace for one shop then Harlescott for another when both shops were based in the town.”

- “Increased parking charges within the town centre, LCWIP [local cycling and walking infrastructure plans].”
- “Under 4.5.3. It states ‘...decrease charges outside the loop...’ - this is relation to Town Centre Parking Charges but THIS IS NOT THE CASE as Frankwell is clearly outside the loop and yet it is due to be increased!”

Two respondents felt that the **plans did not focus enough on the pollution caused by trains:**

- “You have totally ignored the NO2 emissions from diesel trains at the station and are wrongly penalising car and van drivers. This will not have the desired effect while diesel trains continue to cause the majority of air pollution in Shrewsbury.”
- “No impact of trains considered even though the Shrewsbury 'high pollution' area is the train station.”

Additionally, four of the responses in this section **specifically focused on the North West Relief Road (NWRR):**

- “Too much concentration on the Castle Foregate "hotspot". Too much reliance on the "benefits" of the NWRR. Not enough consideration of other parts of the Town Centre.”
- “The Station Gyrotory may not achieve the reductions required and in fact might lead to more pollution rather than less. Also claiming the NWRR will also alleviate pollution in the town cannot be founded at this stage....There has been no modelling to show how traffic will change moving out of town and to the NWRR. What modelling there is shows inaccuracies....The Northern Area of the town also has the incinerator which had added to air pollution in this area.”
- “The obsession with the unfunded NWRR. This road could pollute Shrewsbury’s water and this has not been addressed. There will be a huge loss of habitat and trees which naturally capture carbon. Once built, housing developments along the road will follow encouraging more traffic.”
- “Shrewsbury document assumed NWRR is a done deal when it clearly is not. Increased parking charges are a detriment to local businesses - alternative offers of park and ride are wholly inadequate.”

4 Additional Feedback

Additional questions were asked of survey respondents that were designed to gather feedback on the plans that would help decision makers to consider things they might not have taken into account in the plans. The first of these questions was aimed at the potential impacts of the plans on people and groups with protected characteristics as defined by the [2010 Equality Act](#), which include things such as age, sex, and disability.

Equalities Impacts

As part of the development of the action plan and consultation process, Shropshire Council carried out an Equalities, Social Inclusion and Health Impact Assessment (ESHIA). The ESHIA is to ensure that people of different protected characteristic groups are not adversely impacted by any changes delivered as a result of implementation. Issues of diversity and equality and health are important aspect of how the council delivers its work, and an increasing area of focus with costs of living increases. For this reason, respondents were asked to review the ESHIA and to provide any comments they had about the action plans' impacts on people and groups with protected characteristics.

13 responses to this question were provided in total, and not all of these responses pertained to Shrewsbury. A few responses to this question rejected the need for there to be a focus on the impacts for people with protected characteristics.

Those responses pertaining to Shrewsbury or all Shropshire residents primarily focused on the impacts of the proposed action plans on those with disabilities, ill health, or the elderly. The common theme among these responses was to emphasise the need for measures to take into account accessibility and mobility as part of the plans. These comments were as follows:

- “Elderly pedestrians and children would be adversely affected by the removal of pedestrian crossings. Disabled residents who have no option but to access the town centre by car could be adversely affected by punitive measures against cars in the area, unless exempted somehow.”
- “These plans will disadvantage several groups and there is a high risk they will not deliver the desired improvement. I have an elderly friend with incontinence, the current bus station and toilets are essential for her but when this is demolished she will struggle to find somewhere to relieve herself when she gets off the bus. She also struggles walking up hills and the new plans may make some areas of town a lot harder for her to access. She is losing her eyesight and having the bus station under the railway bridge will make it much more dangerous for her to cross. Workers on low wages and those with a degree of mobility issues who do not qualify for blue badges will suffer from the increased parking charges, particularly with the extended charging hours.”
- “My daughters health is impacted by car travellers- the towns should be car free.”
- “Exceptions to any town centre traffic reductions must include blue badge holders so they have equal access to their town. This needs to be 24/7.”
- “Older and disabled are being ignored, businesses seem not to matter. The country has thrown away all our manufacturing now we want to throw away our towns as a place to work WHY?”

Alternative Suggestions

Survey respondents were also asked to provide open-ended comments on any alternative suggestions to the action plans for Shrewsbury that they would like to offer. 15 individuals provided responses to this question. The following comments represent excerpts from these responses and are roughly grouped according to

some of the themes that emerged in the analysis of the full responses to this question.

Some respondents' comments pertained to **suggestions about public transport and active transport** solutions, such as around trains and buses in Shrewsbury, or walking and cycling routes. For example:

- “Re: planning of bus routes in and around the town. Understanding why people are making the journeys they are. No one has actually asked drivers this - it is all assumed. Without this information you cannot make provision for any improvements. The better publicising of footpaths/cycle paths to and from activities so people can walk and start to reduce the journeys they make by car.”
- “Ban trains.”
- “Work with the government and rail companies to electrify the line to Shrewsbury. Also bring back regular bus services rather than this DRT, my son had to walk three miles to pick up a so-called demand-responsive bus - what would an elderly person be expected to do?”
- “Stop the NWRR. Build cycle lanes.”
- “Use the NWRR funds remaining to fully fund sustainable, reliable transport and the re-opening of village, suburban railway stations/platforms.”

Other respondents made **suggestions specific to car travel** and improving road conditions, parking, or congestion. For example:

- “Link this with the Movement Strategy more precisely - in particular with plans for removing Through Traffic.”
- “Message on social media: ‘There are no Level 3 rapid EV chargers in the SY park and ride sites. 7kW charges are not the answer.’ Put that in your consultation.”
- “Stop building out of town because people who need to access out of town drive through the town to get where they need to, yet those who work and earn in town are being punished.”
- “Divert EV investment to improving roads.”
- “Do not ban and price people out of town and reward those out of town whose location actually causes additional pollution. Encourage new ideas by reducing the cost but do not price car users from the town as they will drive further out of town or to Telford for easier and cheaper parking.”
- “Decrease or at the very least keep the Frankwell Car Park charges the same.”
- “If traffic and idling are major contributors, make the flow of traffic through the railway station area better - Rather than worse and hoping people bike instead. This could have been achieved by improving traffic light sequencing, widening roads, etc - but instead the opposite appears to be happening there.”

Additional Survey Feedback

As is common practice with consultations, survey respondents were offered the opportunity to provide “any other comments” they wished to make about the strategies. 11 respondents provided comments in this space. Some of these

responses were general to the actions plans for both Shrewsbury and Bridgnorth, and some were clearly specific to one town or the other. For example, this respondent had very specific feedback to make about increasing green spaces in Shrewsbury:

- “I feel that Shrewsbury now has to create more open green spaces in between developments. Building on every green blade of grass between the Station and Harlescott Crossroads now can be seen as a disaster. People need to have open green areas where they live, planted with trees, so that their air quality can be improved. I have not seen any plans which have taken this into any consideration. E.g. - why not surround the Flaxmill with trees rather than building more houses on the old Midland Red garage? It would be interesting to know why this has not been the case?”

A few respondents had more things to say about **public transportation or traffic**. For example:

- “The problem is a reliance on the private car.”
- “More buses to remote areas!”
- “[The plans] have totally ignored the contribution of emissions by diesel trains.”
- “This must be linked to the Movement Strategy and changing the "Experiment" of sending all incoming traffic over the English Bridge on Saturdays and Sundays along Town Walls.”

Some respondents used this space to **criticise the council, the plans, or the consultation**. For example:

- “It seems that without significant investment the problem will not be solved. This feels like it is being done on the cheap.”
- “Business will be harmed by the higher parking charges and longer charging hours as they will find it hard to hire staff. I am disappointed you paid these consultants as they have basic numerical errors in their data tables.”
- “Cancel all.”
- “A lot of highly paid bureaucrats were involved.”

Feedback from Letters

Five detailed letters were sent in response to the consultation, and all letters have been sent to the service area in full. One of these letters was specific to the Shrewsbury plan, and two of the letters discussed both plans. These three letters are summarised below. Two additional letters were specific to the Bridgnorth plan, and these are discussed in the Bridgnorth consultation report.

The **letter from an individual¹ specific to the Shrewsbury plan** further elaborates on some of the comments this individual also made in the online survey, which are captured above. Particularly, this respondent calls attention to errors that they perceive to be in the grid coordinates provided along with the consultation. Moreover, the respondent **makes the point that the action plan may in fact not deal adequately with train diesel emissions**, which they are concerned are causing most of the air quality issues in the town. The respondent says:

¹ This individual did not write representing a group and has not been named here as they did not give consent to do so.

- “It appears from your own data that the highest emissions levels are not in the town centre but are actually along and to the east of the railway, this is consistent with south-westerly winds blowing emissions from diesel trains towards Underdale. These emissions from trains may also explain why your ‘distance correction’ attempts appeared to give inconsistent results. I am concerned that you are going to waste a lot of money implementing punitive anti-car measures but will actually find no real decrease in emissions while the issue of diesel trains remains. These regularly end up idling in the station and it would be really helpful if you would consider placing a fixed air quality monitoring point within the station itself.”

Two letters commented on both plans. The first came from **Shrewsbury Friends of the Earth**, which for obvious reasons took more time in responding to the Shrewsbury plan than the Bridgnorth plan. Details of this group’s responses to the Bridgnorth plan are contained in the Bridgnorth consultation report and are not included here.

First, the group made several points and **asked questions about the calculations around the cost benefit scoring** in Table 7-5 of the action plan documents. The group also asked several detailed **questions about the calculations and assumptions in the plan’s discussion of the North West Relief Road**.

The group’s letter concluded with the following comments:

- “The Gyrotory is rightly modelled to produce great improvements in air quality at relatively little cost compared to the NWRR, so it is surprising that Shropshire Council still adhere to the idea that the NWRR is necessary to improve air quality. Although some other measures have been considered, many have been discounted because of the cost. Given the cost/benefit of the gyrotory, it is surprising that the LCWIP was not considered for further expansion. Lastly, great emphasis is laid on the current legal limit of 40ug for NO₂. These limits were introduced about 15 years ago. Currently, the WHO is recommending 20ug as an interim target with a final target level of 10ug. These are limits were set after numerous medical studies. Despite this, we have an AQMA which seems to regard meeting the 40ug target as acceptable for the coming years and seems to have no plans for further reductions.”

The final letter received with comments on the Shrewsbury action plan was written on behalf of the **Environment Agency**. The letter contained several observations about both plans. General observations about the plans, and those observations specific to the Shrewsbury plan are included below. Those specific to the Bridgnorth plan can be found in the Bridgnorth consultation report. Overall, the agency seems to support the plans’ focus on NO₂ emissions in particular, and the inclusion of park and ride and sustainable transport methods as part of the plans.

Observations from the Environment Agency:

- “We like that there are a wide-ranging set measures already in place to address NO₂ concentrations, and that there is a suite of measures planned, with funding sources identified, to bring further reductions in NO₂.”

- “We note that you are committed to improving air quality in Shropshire to improve health. We note that 4.4% of deaths across Shropshire were attributed to particulate air pollution in 2022.”
- “The Shrewsbury AQMA was declared in 2003 and amended in 2006 for exceedance of annual mean NO₂ because of high traffic volumes and congestion associated with unitary authority roads and that approximately 1850 people are living within the AQMA.
- “We note that you mention there is a decreasing trend from 2018-2022 in NO₂ concentrations within the Shrewsbury & Bridgenorth AQMAs.”
- “You mention that a 43.2% reduction in NO_x emissions are required within the Shrewsbury AQMA.”
- “You mention that the redistribution of traffic from the gyratory scheme within Shrewsbury AQMA will reduce NO₂ at the worst-case modelled receptors but there will be some increases in NO₂ concentrations in other areas of the AQMA. Your models indicate that these are still below the annual mean Air Quality Objective. You propose to deploy additional diffusion tubes at these receptor points which indicate increases in annual mean NO₂ concentrations.”
- “The North West Relief Road (NWRR) you state will divert traffic out of the centre of Shrewsbury and that modelling indicates the annual mean NO₂ concentrations at all receptors close to the worst-case area of the Shrewsbury AQMA will reduce once completed.”
- “You also aim to promote sustainable transport and encourage the usage of Park and Ride schemes to further reduce traffic within the AQMAs.”
- “It is encouraging to see that consideration within the planning stage of developments and policies focusing on sustainable transport methods are promoted for developments which are expected to generate significant traffic levels.”

5 Summary and Conclusion

56 respondents participated in the consultation on both the Shrewsbury and Bridgnorth Air Quality Action Plans, with most answering as individuals or members of the public. A few detailed letters of response were also received and summarised above.

Overall satisfaction with the Shrewsbury AQAP was mixed. 45% of respondents were dissatisfied or very dissatisfied, while 18% were satisfied or very satisfied with the plan. Positive feedback on the Shrewsbury plan included appreciation for the focus on air quality, the idea of electric buses, and improvements in public transport and traffic flow. Concerns about the plans included impacts on public transport, business, parking charges, and the North West Relief Road (NWRR). Respondents also emphasized the need to consider accessibility for people with disabilities and the elderly and offered alternative suggestions to be considered in the plan, like improving public transport and creating more green spaces.

Very many thanks are extended to the individuals and organisations that took the time to respond to this consultation and to provide often very detailed and extremely

thoughtful feedback. The feedback will be taken into consideration by the Environmental Protection Team before the plan is presented for final approval.

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