



**Vale
of White Horse**

District Council

Air Quality Action Plan 2014

Consultation Summary

A summary of consultation undertaken by the council between June and August 2014 to help shape proposals to improve air quality across the district

NOVEMBER 2014

SUMMARY

This report provides a summary of the consultation that Vale of White Horse District Council (VWHDC) undertook between June and August 2014 to prepare an air quality action plan (AQAP) for the district.

The consultation sought the views of various organisations, local communities and individuals on draft proposals intended to bring about air quality improvements throughout the district.

Opportunities were created for members of the public to provide feedback via our online consultation tool and in writing.

A total of 47 people and organisations responded to the consultation.

A range of issues and concerns were identified from the consultation responses. The most prevalent are shown below along with our response.

A particular concern mentioned by 40 per cent of respondents was the fact that Marcham had not been declared as an Air Quality Management Area (AQMA) and that no measures were included in the plan to address air quality issues in this settlement. We are aware of the air quality issues in Marcham and we are now considering evidence which supports the need to declare an AQMA for Marcham. Marcham residents affected by any proposed AQMA will soon be consulted on some specific proposals.

THE AIR QUALITY ACTION PLAN

The draft air quality action plan was published by the council on 26 June 2014. The action plan was produced as a result of the national air quality objective for nitrogen dioxide not being met in Abingdon and Botley. It proposed a series of potential actions for the district, some general and some area specific which all aimed to reduce levels of air pollution by tackling current sources and by better managing potential new sources.

THE CONSULTATION

We consulted on the draft action plan between 26 June and 15 August. Vale of White Horse District Council is committed to working collaboratively with organisations, the local community and individuals to ensure that a targeted workable action plan is produced that can be implemented with the support of all those involved.

Following the completion of the draft plan we consulted the public to gather feedback useful for the purposes of improving the proposed measures outlined in the action plan. We approached a wide range of stakeholders, including both statutory and non-statutory consultees. A full list of the people and organisations that we consulted is shown in **Appendix 1 – Consultees**.

To raise an awareness of the consultation we issued a press release, published details on our website and sent email notifications to our key stakeholders.

Members of the public were able to submit comments online using the council's consultation system during this period (<http://www.southoxon.gov.uk/airquality>) We also accepted comments made in writing to the Council Offices, Benson Lane, Crowmarsh Gifford, Wallingford, OX10 8NL.

CONSULTATION RESPONSES

47 responses were received in response to the consultation from members of the public and organisations interested in the draft plan.

General consultation comments

CONCERN THAT NO ACTIONS WERE PROPOSED FOR MARCHAM

The majority of comments (40 per cent) relate to Marcham which had not been declared an Air Quality Management Area (AQMA) and therefore did not feature in the draft plan.

Respondents felt that there was an air pollution problem in Marcham and expressed concern that nothing was being done by the council to address this.

Please be sure to include Marcham in your plans.

I am amazed that you are ignoring the problem of the levels of traffic and resulting air pollution are causing in Marcham.

Don't forget Marcham. Packhorse Lane has a very severe air quality problem.

We are considering evidence which supports the need to declare an AQMA for Marcham. If this happens, the overall plan for the district will be amended accordingly.

THE PLAN IS NOT AMBITIOUS ENOUGH

A number of respondents thought that the plan was not ambitious enough for tackling the problem of air pollution in the district.

The proposed actions seem unambitious, given that the population of the Vale will lead to increased traffic on all local roads.

Re the Botley AQMA:- the action plan does not seem nearly enough to begin to approach the problem of poor air quality in this area.

The actions in the draft Action Plan, while related to several best practice measures lack commitment.

We have considered actions which we think could have a positive impact on air quality; the actions proposed have to be realistic and practical. Many of the proposed actions depend on feasibility to assess that they will be effective and can be put in place. Some proposals will not be able to be implemented without funding being identified.

ACTIONS RELATING TO DEVELOPMENT IN BOTLEY

There were a few specific comments on the West Way development proposed for Botley and the impact this would have on air pollution in this area. These respondents felt that the plan did not include sufficient actions to deal with this.

Plans for the new Westgate development and the misguided West Way development proposals are likely to increase traffic and exacerbate air quality problems around Botley

Planning permission for the proposed development in Central Botley should be refused on the grounds that it will increase air pollution in the Botley AQMA.

Air Quality is a consideration as part of the planning process particularly for larger developments such as the proposed West Way development. There is a procedure for assessing the significance of impacts on air quality and the air quality impact of the proposed development has been assessed as not significant.

PROPOSED BARRIER IN BOTLEY

I note that the only proposal for Westminster Way in Botley is simply to raise the barrier which separates it from the A34. This is not good enough and doesn't address the current and future traffic movements along Westminster Way itself.

The Botley measures (more barriers) are unlikely to solve the problem there. It is difficult to see how the Botley air quality problems could be resolved. In view of this it is imperative that new sources of air pollution are not added

The options for improving air quality in Botley are very limited. The proposal to look at the feasibility of additional barriers needs further clarification. The proposal is not to raise the existing barrier but to consider if it could be feasible to provide a barrier alongside the

southbound carriageway where air pollution is more significant and where there are additional challenges of access to nearby properties.

OTHER

There were some specific comments about wording used in the AQAP

Refer to 'low emission' rather than 'green' vehicles

There is no relevance to the statement "doubts remain about the overall economic benefit of the scheme" in relation to AbITS in the air quality action plan.

We have amended the AQAP to reflect these comments. A list of amendments is included in Table 3.

Views on actions proposed in the draft plan

Excluding single issue comments about Marcham, the majority of actions proposed in the draft action plan were supported by respondents to the consultation.

The most popular action was the production of air quality planning guidance. 36 per cent of respondents expressed a preference in favour of this.

Our proposal to trial 'eco-driver' training with council staff and possibly with other transport operators was also particularly popular.

The only action that was not favoured was our proposal to assess the feasibility of barriers in Botley. A quarter of respondents expressed concern or opposition to this proposal. Some respondents assumed that this meant that we would increase the height of the existing barrier alongside Westminster Way. This is not something that we are considering. Our proposal is to consider the feasibility of barriers on the southbound side of the A34 where there is no barrier but where pollution levels are greatest. We will assess the feasibility of this and it will remain in the plan but the wording will be changed to make it clearer.

The table below shows the distribution of positive and negative comments in relation to all of the actions proposed in the draft plan.

Table 1

Action	Measure	Number of responses
1	Low emission strategy and low emission zone feasibility study	8 for 1 against
2	Installation of electric vehicle charging points	8 for
3	Parking permit and pricing incentives for green vehicles	7 for
4	Feasibility study for freight consolidation centre FCC/ freight quality partnership	7 for 1 against
5	Taxi licensing incentives for 'green' vehicles	7 for
6	Improved use of traffic regulation orders	8 for
7	Review of the council and contractors fleet	8 for
8	Eco driver training	9 for
9	Air Quality planning guidance	10 for
10	Community involvement projects	8 for
11	Introduce south facing slips to Lodge Hill interchange	8 for 1 against
B1	Assess feasibility of barriers in Botley	4 for 7 against

Other actions suggested by consultees

We asked consultees if they had any further suggestions for actions to be included within the plan. A total of 26 suggestions were made which are detailed in Table 2 below, along with our response.

Table 2

Proposal	Proposed action	Feedback to proposal
1	Further action required to address air quality issues in Marcham	There will be consultation on the issue of air quality in Marcham in the near future.
2	Impose weight restrictions	The feasibility of imposing weight restrictions to roads with air quality issues, where this is practical will be investigated with OCC.
3	Re-route refuse lorries away from Abingdon via Heyford Hill/Nuneham Courteney	This relates to measure 7 and will be given consideration, but any changes may have other knock on affects which could make it unfeasible.
4	By Pass for Marcham	This has been a long standing wish and a route for a by-pass has been identified by OCC. There is no funding allocated to this project, which is only likely to be forthcoming if there is significant development in the area. This will be considered further as part of the considerations for an AQMA and AQAP for Marcham
5	Discourage burning of garden waste and coal	This can have a local impact but does not impact significantly on our AQMAs. Where traffic emissions dominate. Where significant nuisance is caused by such burning we have powers to address this.
6	Action should extend beyond the AQMAs	Many of the actions will, if successful, have impacts beyond the AQMAs.
7	More consideration needs to be given to particulates	Particulates are detrimental to health but studies indicate that for the most part particulate levels are not above the AQO outside very busy roads in major conurbations. Monitoring of PM2.5 is undertaken by Defra.
8	There should be no development which increases traffic in an AQMA	Measure 9 addresses planning guidance and significant air quality impacts are considered in the planning process. It is not possible to stop an increase in traffic but there should be an overriding aim to minimise emissions where possible.
9	Plant more trees	Trees between an emission source and receiver can have a positive impact on air quality, and where space allows the planting of trees could be encouraged. However where air quality impacts are worst is where houses are very close to busy roads where planting trees is not an option.
10	Speed limit enforcement in Marcham	The speed through Marcham is self limiting due to the narrowness of the road and the bends. If however speed is an issue this could be investigated further as part of future AQMA considerations.
11	Need more options for Botley	Unfortunately given the nature of this road and the

		proximity of houses, options for improving air quality close to the A34 are extremely limited. This is a major freight and transport route. In Botley there is already a speed restriction and a barrier to the north bound carriageway.
12	Restrict HGVs from Westminster Way	We are not aware that this is a particular issue, but if it is we could consider it alongside 2 above.
13	LEZ for A34	This is unlikely given the nature of the A34 and the lack of suitable alternative north-south routes. However this will be given further consideration in measure 1 of the AQAP
14	Improve monitoring	The level of monitoring in Marcham is in line with monitoring in other AQMAs across the. Previous monitoring has indicated that the only pollutant of concern is nitrogen dioxide. The current level of monitoring gives sufficient information for assessment of air quality. However the location of monitoring sites is regularly reviewed to ensure that it is appropriate.
15	Encourage school and business transport and travel plans	This proposal is included under measure 10 as a county wide initiative in the AQAP.
16	Cheap frequent public transport	Abingdon is well served with bus links to Oxford. It is not clear that improving public transport would have any impact upon the A34 in Botley, but cheap frequent public transport could have benefits in reducing road traffic emissions generally, if it is well patronised.
17	Cover the A34 and remove the NO2	This is an innovative idea but is unlikely to be developed as the costs could be prohibitive and it would probably not be feasible for reasons of health and safety and planning.
18	Have more proactive public information and real time pollution level indicators	The council is developing a joint website with other Oxfordshire authorities which will contain up to date monitoring including real time data from continuous monitoring sites.
19	Refer to low emission rather than 'Green' vehicles	This point is noted and the AQAP will be amended accordingly.
20	Have a freight partnership/ecostar scheme	This will be considered along side measure 4 in the AQAP.
21	Consider other 'Green' technologies	As we become aware of other 'green' technologies which are likely to have a positive impact on improving air quality, we will give them consideration.
22	Planning guidance for all developments	Planning guidance will be overarching but it will also have a particular focus on development within AQMAs.
23	Consider traffic and emission forecasts	Traffic and emission forecasting is already used as a useful tool in assessing air quality impacts of proposed developments.
24	Consider measures for S.Hinksey	The principle air pollution source in S.Hinksey is the A34, however monitoring indicates that nitrogen

		dioxide levels are below air quality objectives.
25	Schedule commercial deliveries outside busy periods	This will be considered as part of measure 4 in the AQAP.
26	Improve natural gas re-fuelling network	The lack of availability of gas re-fuelling stations will limit take up of gas powered vehicles. We will consider lobbying for greater availability.

To summarise, there is broad support for the measures proposed in the AQAP. With regard to the general consultation comments, they have been addressed;

- We are currently considering declaring an AQMA in Marcham. Relevant stakeholders and Marcham residents within or close to the proposed AQMA will be consulted on this.
- The AQAP has to include measures which have a realistic potential of improving air quality and are practical. The plan contains measures to assess the feasibility of some options, if options are identified as feasible and practical, then further consideration will be given to how they can be implemented
- The West Way development impacts are being assessed as part of the planning process
- There is misunderstanding about the measure relating to the feasibility of barriers in Botley. Any study will be focussed on the southbound carriageway of the A34 where there is no barrier, where pollution levels are greatest and where there are significant challenges with access. The AQAP will be amended to make this clearer.

NEXT STEPS

The AQAP has been amended in the light of the consultation and the amendments are listed in the Table 3.

Table 3

number	Page	request	action
1	8	Remove 'Although the air quality benefits have been positive doubts remain about the overall economic benefit of this scheme'	Statement removed from AQAP
2	8	Update 'Marcham'	Delete second sentence and replace with; 'A recent detailed assessment has modelled air quality in the area and the recommendation is that an AQMA should be considered by the council. The council will be consulting on this in the near future.'

3	13, 15,17	Replace 'green' with 'low emission'	Amendments made
4	24	Provide more detail on the area under consideration for barrier assessment	Change 'Action' to read; 'Commission a feasibility study to identify potential air quality impacts of installing barriers near the southbound carriageway.'
5	17	Change 'would' to 'could'	'Costs/barriers' section amended
6	11	Amend statement re no LEZ studies for rural areas	Statement updated to indicate that we are not aware of rural LEZ studies and we will review studies we become aware of

Defra has been consulted on the draft AQAP and are happy with the overall approach. Once the AQAP has been approved, this along with the consultation responses will be forwarded to Defra.

APPENDIX 1: CONSULTEES

Statutory

Defra
Oxford County Council
Highways Agency
Environment Agency
Thames Valley Health Protection Unit
Oxford City Council
South Oxfordshire District Council
West Oxfordshire District Council
West Berkshire District Council
Swindon Borough Council
Abingdon Town Council
North Hinksey Parish Council
Marcham Parish Council

Non statutory

Enterprise Mouchel
Chamber of Commerce
District Councillors
General Public
Freight Transport Association