

**Report of:** Environmental Health Business Manager

**To:** EXECUTIVE BOARD

**Date:** 16<sup>th</sup> January 2006

**Item No:**

**Title of Report:** Public Consultation on the Draft Air Quality Action Plan

### **Summary and Recommendations**

**Purpose of Report:** The Executive Board approved the Draft Air Quality Action Plan for Public Consultation at its meeting on 11<sup>th</sup> July 2005. This report summarises the responses received during the public consultation.

**Key Decision:** No

**Portfolio Holder:** Councillor John Tanner (Environment)

**Scrutiny Responsibility:** Environment Scrutiny

**Ward(s) affected:** All

**Report Approved by:**

The Environment Portfolio Holder

The Environmental Health Business Manager

Legal and Democratic Services Business Manager: (Jeremy Franklin).

The Finance and Asset Management Business Manager: (Andy Collett).

**Policy Framework:** This work reflects the Council's Vision of improving performance and working with others to deliver shared goals. It specifically contributes to the strategic priority of improving the quality of the environments where people live and work and the Community Strategy theme of working to create a better living environment.

**Recommendation(s)**

Agree the recommendations in paragraph 43 of the report.

## Introduction

1. At its meeting in the 17<sup>th</sup> July 2005 the Executive Board approved the draft Air Quality Action Plan (AQAP) for the Central Oxford Air Quality Management Area. The Air Quality Management Area (AQMA) was declared because assessments of air quality predicted that the national annual mean air quality objective for nitrogen dioxide of 40 microgrammes per cubic metre ( $\mu\text{g}/\text{m}^3$ ) is not likely to be met by the target date of December 2005. The objective is very challenging however it is not an absolute requirement that it be achieved by December 2005.
2. The main source of the pollution in the AQMA is from road traffic. Guidance from the Department for Environment, Food and Rural Affairs (DEFRA) states that, where road traffic emissions are the largest single contributor to pollution in the AQMA, the AQAP should be integrated with the Local Transport Plan (LTP). The next LTP, which sets out a five-year strategy (2006-2011) for the co-ordination and improvement of transport is currently being prepared by Oxfordshire County Council
3. The draft (AQAP), a requirement under The Environment Act 1995, puts forward a range of actions to improve air quality in the Central Oxford Air Quality Management Area. A copy of the draft AQAP has been circulated separately to members. A copy has been placed in the members room and further copies are available on request.
4. The Environment Act 1995 requires that consultation is carried out on all aspects of the Local Air Quality Management process. It is a statutory requirement to consult with DEFRA; the Environment Agency; the Highways Authority; Oxfordshire County Council; Cherwell, South Oxfordshire, West Oxfordshire and the Vale of White Horse District Councils; the Government Office for the South East and the NHS Executive.
5. The Executive Board agreed that all Area Committees and Environment Scrutiny should be consulted during the August and September 2005 committee cycles. It was also agreed that the bus companies, bodies representing local business interests and other organisations, and local interest groups should be consulted on the draft AQAP. In addition consultation would be carried out via the Council's website and public displays.
6. The consultation was timed to coincide with Oxfordshire County Council's consultation on the Local Transport Plan (LTP) as the two documents are closely linked. Following the consultation it was agreed that a report would be taken to the 16<sup>th</sup> January 2006 Executive Board for Members to consider any relevant responses and agree amendments with the recommendation that Council adopts the final AQAP at its meeting on 20<sup>th</sup> February 2006. The final AQAP will then be submitted to DEFRA for their approval.

## **Consultation**

7. Oxfordshire County Council fell behind with the commencement of the consultation on the LTP. At their request it was decided to delay consultation on the draft AQAP by one Committee cycle so that the two processes would still coincide. Consultation with the Area Committees and Environment Scrutiny therefore took place during the November 2005 committee cycle. The Local Transport Plan was also presented to the same Committees.

8. Copies of the draft AQAP were sent to the following bodies and organisations:

DEFRA; the Environment Agency; the Highways Authority; Oxfordshire County Council; Cherwell, South Oxfordshire, West Oxfordshire and the Vale of White Horse District Councils; the Government Office for the South East; NHS Executive; Oxford Bus Company, Stagecoach; National Federation of Bus Users; Licensed Taxi Association; Arriva and the Shires Ltd; Oxford Civic Society; Oxford Preservation Trust; Oxford Pedestrians Association; Thames Valley Police; Oxfordshire Fire Service; University of Oxford; Oxford Brookes University; CYCLOX; Friends Of the Earth; Oxfordshire Environment Group; National Asthma Campaign; Oxford Civic Society; Oxford Times Newspaper; OX1; Oxford Covered Market Traders Association; Oxfordshire Chamber of Commerce & Industry; Oxford & District Trades Council; Blackbird Leys, Horspath, Littlemore, Marston, North Hinksey, and Risinghurst and Sandhills Parish Councils; Central Ward, South Quarter, York Place, Rewley Park, St John's Street, St Ebbes Tenants, St Ebbes New Development, and West Quarter Residents' Associations; Folly Bridge Management Committee.

9. A summary booklet of the action plan with a questionnaire was also available at the Main and Local Libraries in Oxford, Sainsbury's supermarket in the Westgate Centre, and Oxford Railway Station.

10. Displays on the draft AQAP and the LTP were set up in the receptions of Ramsay House and Speedwell House (County Highways). A display was also set up in the Westgate Centre between Friday 25<sup>th</sup> November and Tuesday 29<sup>th</sup> November 2005.

11. Consultation on the draft AQAP finished on the 2<sup>nd</sup> December 2005.

## **Response to Consultations**

### *Statutory Consultees*

12. Responses have been received from three of the statutory consultees, The Department for Environment Food and Rural Affairs (DEFRA), Oxfordshire Primary Care Trust, and Oxfordshire County Council.

13. The final AQAP will be submitted to DEFRA and so their comments are considered particularly significant. DEFRA have indicated that the AQAP has a clear identity and recognizes the links with the LTP and the new shared priority on Air Quality. The proposals, which include a Low Emission Zone (LEZ) and bus and freight quality partnerships target emissions from buses and HGV's, and this in their view seems wholly appropriate given the nature of the emissions source. DEFRA said however, that the following work is required before the AQAP can be considered acceptable:

- Inclusion of further details on the approach to impact assessment
- Wider consideration to non-air quality impacts
- Further evidence on the perceived costs for implementing the measures
- Inclusion of time-scales by when measures will be implemented
- Identification of the bodies/organizations responsible for implementation of the proposed measures
- Outcomes of the consultation with specific emphasis on how the consultation process has influenced the Council's approach to implementation.

The full comments from DEFRA are shown in Appendix A

14. The Oxfordshire NHS Primary Care Trust have commented that the AQAP should incorporate a formal health impact assessment to account for health inequalities and quality of life issues, including the impact of transport policy upon the most disadvantaged. A wider view should include informed travel choices and pedestrianisation as positive health impacts, and include impacts on accessibility for all.

The comments from The Oxfordshire NHS Primary Care Trust are shown in Appendix B

15. Oxfordshire County Council are proposing to agree the contents of the AQAP with Oxford City Council through officer liaison coordinated through Steve Howell (Head of Transport), and Michael Lawrence (Strategic Director Housing, Health and Community).

The comments from Oxfordshire County Council are shown in Appendix C

#### *Environmental Scrutiny and Area Committees*

16. The Environmental Scrutiny considered the draft AQAP and recommended that:

- Air quality objectives be clearly integrated into the LTP
- The LTP has air quality as top priority for weighting measures in the City
- Bus Gate Enforcement, the Bus Quality Partnership, Retro fitting, Clean Fuels and an LEZ, (including a feasibility study) should be included in the LTP as a priority

- Measures in the AQAP should be implemented immediately with a timetable for action and implementation
- A discussion paper setting out the options for nitrogen dioxide targets is submitted at a future meeting of the Environment Scrutiny Committee
- The Environmental Impact Assessment of the Westgate Centre development is submitted to the Environment Scrutiny Committee as part of the consultation on the development

Comments from the Environment Scrutiny Committee are shown in Appendix D

17. The areas covered by the Central, South & West Area Committee and the East Area Parliament are likely to be most affected by the proposals in the draft AQAP. Both Committees recommended that a LEZ should be implemented in central Oxford. The East Area Parliament and the North Area Committee also recommended that the powers to allow roadside testing of vehicles should be adopted.

Comments from the Area Committees are shown in Appendix E

### *Bus Companies*

18. A detailed response consisting of a 31-page report was received from the Oxford Bus Company. None of the other bus companies responded to the consultation. In summary the Oxford Bus Company would want to see emissions from buses reduced rather than a reduction in bus numbers or the re-routing of buses away from the centre. It therefore supports the principle of an LEZ for central Oxford, but it recommends that this is considered as one of a series of measures to control emissions including the Bus Gate enforcement, bus engine switch-off, Taxi Quality Partnership, reducing bus boarding times, and reducing congestion on the bus priority route.
19. The Oxford Bus Company state that they already have one of the cleanest bus fleets in the UK. They claim that their ongoing vehicle replacement policy should reduce NOx emissions by approximately 29% over the five-year period of the next LTP. They will also be introducing a vehicle-labelling scheme that will enable the public to easily identify the relative emissions of a bus. Under the scheme each individual bus will be given a star rating according to the Euro standard of the engine e.g. pre-Euro no stars up to three stars for Euro III.
20. The Oxford Bus Company does not agree with the conclusions in the AQAP that the de-regulation of bus services has had a negative effect on air quality, or that cross ticketing would reduce the number of buses. A summary of the response from the Oxford Bus Company is shown in Appendix F

### *Other Consultees*

21. OX1, representing the business community said there is a need to link the environmental and economic impacts of the measures within the assessment process. They suggest a full economic impact assessment of the air quality measures is required, and the timescales for implementation should be realistic. In their opinion bus deregulation is working against environmental improvements. They are concerned by options to ban traffic from central Oxford and alternative means to access the city centre should be examined. They recommend full consultation with the business community before decisions are taken.
22. The Bus Users Group oppose a central LEZ because it would impact on bus services, result in loss of amenity to bus users and increase private traffic. They think that the impact of parking measures needs to be considered in more depth because they suspect the estimates in the AQAP are too low.
23. Cyclox have said that more emphasis is required on non-motorised travel options; reductions in motorised vehicle use need to be embedded in the AQAP. There is no mention of the impact of the Westgate development, which is likely to generate more traffic. In their view the action plan is unbalanced based on technical fixes, ignoring the impact of smart choices of non-motorised travel, which should come first.
24. The Oxford Pedestrians Association strongly support the measures in the AQAP particularly a LEZ, a reduction in the numbers of vehicles, a 20mph zone, the Bus Gate Enforcement, less duplication of bus services, better management of commercial loading, and a reduction in central area parking. They also suggested that there should be more investment in walking and cycling strategies to reduce the need for private car use.
25. The St John's Area Residents Association think that the low priority given to Air Quality as a shared priority within the LTP is unacceptable. There should be more focus on reducing bus and HGV pollution, and buses should be relocated as part of the Westgate proposals. No mention is made of Vehicle congestion charging or of the rat-runs in the City to avoid the A34. They suggest that busses should be to Euro 3 standard by 2007, and Euro 4 by 2009.
26. A response was received from North Hinksey Parish Council encouraging the City to take appropriate actions to improve air quality in the AQMA
27. Responses from the above consultees are summarised in Appendix G

### *General Public*

28. A total of 91 responses were received to the questionnaire. The general consensus is that air quality in Oxford City is poor, and that good air quality is important to health and for making the City a good place to live

and work. To improve air quality the following measures were all considered important; promoting alternative means of travel; limiting access to the city centre only to cleaner vehicles; restricting traffic access to the city centre during busy periods; improvements to public transport service; development of intelligent transport systems for congestion control; and reviewing parking charges. The responses are summarised in Appendix H.

29. A total of 8 individual written responses and 26 sets of comments appended to questionnaires were received. There was overwhelming support for taking measures to improve air quality including; the setting of environmental targets; the need for coordinated development and planning policies; promotion of walking and cycling including better facilities such as improved cycle lanes and more cycle parking; cleaner buses; less empty or near empty buses; enforcement of bus engine switch off; a ban on diesel buses in the city centre; intelligent traffic light systems; congestion charging; increase parking charges; more pedestrianisation; and car sharing. The responses are summarised in Appendix I.

### **Summary and Comments**

30. There was strong support from the consultation for the implementation and further development of cost effective measures to improve air quality in central Oxford.
31. There was recognition from groups with contrasting views that measures need to be subject to a wide ranging cost effective assessment that considers many factors, including economic and health, as well as impacts of schemes city wide. Additionally, comments were made to extend the remit of the action plan to integrate measures in the City that provide for the development of a sustainable transport network, that includes consideration of climate impact.
32. There was strong support for implementing a Low Emission Zone (LEZ) in central Oxford, including an LEZ feasibility study. In the draft AQAP this measure was considered as offering the greatest potential for delivering significant reductions in traffic generated NOx emissions.
33. DEFRA confirmed that an LEZ was wholly appropriate given the emissions source. Environment Scrutiny, the Central, South & West Area Committee and the East Area Parliament all supported the introduction of an LEZ for central Oxford. The Oxford Bus Company, one of the main bus operators in Oxford supports the principle of a LEZ for central Oxford. Other consultees, The Oxford Pedestrian Association, St John's Residents Association and feedback from the general public also supported the introduction of an LEZ.

34. Although there was general support for the introduction of an LEZ it was also recognised that this should not be introduced in isolation but should be one of a series of measures to improve air quality. Other proposals supported included measures to reduce congestion particularly on the bus priority route such as the bus-gate enforcement, phasing of traffic flows, better management of commercial loading, and a reduction in bus waiting times. Bus engine switch-off, a review of parking and a restriction on vehicles in central Oxford during peak periods were also supported.
35. Comments have been made about the need for a wider ranging assessment of proposed measures and city-wide consideration of the impacts of plans for future developments. OX1 representing the business community would like the environmental and economic impact of any measures taking in to account. The NHS Primary Care Trust would like a health based impact assessment of the options for developing sustainable and integrated transport policies for the whole of the City. They have also expressed an interest in being involved in this process.
36. The need to assess new major developments such as the Westgate Centre in terms of their impact on air quality was highlighted. Some feel such developments will have a negative effect on air quality by generating more traffic in the City centre.
37. Other measures mentioned include congestion charging (not included in the Draft Action Plan) and roadside testing of vehicle emissions.
38. It is clear from the consultation that a range of measures will be needed to improve air quality in the city centre. Criticism has been made that most of the options proposed are 'technical fixes' and insufficient account has been taken of promoting alternatives to the use of private transport and controlling the demands posed by predicted traffic growth.
39. The majority of respondents were Oxford residents, working in Oxford who do not use private vehicles for daily commuting. There was strong support for the development of cycling and walking strategies, car sharing schemes, alternative fuels etc.
40. It is clear that an integrated and sustainable city-wide approach is required that includes measures for limiting the impact of traffic growth, and single measures considered in isolation are likely to be ineffective. Thus an integrated package of measures need to be considered within the final action plan that combine to reduce congestion and total vehicle emissions in central Oxford, without leading to negative impacts elsewhere in the city.



## Recommendations

41. The Council will need to adopt the final AQAP at its meeting on the 20<sup>th</sup> February 2006, after further (City - County) officer consultation. It will then be submitted to DEFRA for their approval, and Department for Transport (DfT) as part of the final Local Transport Plan (LTP) by the end of March 2006.
42. Following the public consultation process, further support has been made for the development of cost-effective measures to reduce NOx emissions in the Central Oxford AQMA.
43. The Executive Board are therefore recommended to:
  - a. Agree to the establishment of a working group between Oxford City Council Environmental Health and Oxfordshire County Council Transport Planning Departments to oversee the integration and co-ordination of measures to improve air quality and the environment in Oxford, for long term sustainable development city-wide, including the following:
    - (i) Agree a mandatory air quality target to be included in the LTP
    - (ii) Agree an intermediate transport emission indicator to be included in the LTP
    - (iii) The integration of AQAP measures into the LTP
    - (iv) Ensure all measures are introduced subject to time related targets for reducing transport emissions and improving air quality
    - (v) The continued assessment of LTP indicators throughout (and beyond) the period of the next LTP as a means of determining the effectiveness of measures
    - (vi) The re-assessment and consideration of further measures if time related targets for improvements in emissions and air quality are not being met
    - (vii) Incorporation of an Environmental Impact Assessment of Air Quality for all major developments, such as the Westgate Centre, in Oxford
    - (viii) The development with Oxfordshire Primary Care Trust of a Health Impact Assessment of proposed measures
  - b. Approve a feasibility study for an LEZ for the Central Oxford AQMA, and support the development of the terms and conditions applying to an LEZ for central Oxford

- c. Support the enforcement of the bus-gate by the County Council as a measure to reduce day-time congestion on the bus priority route and AQMA (funding already approved by Oxfordshire County Council to introduce this).
- d. Agree a package of measures with the County Council to reduce congestion in the Central Oxford AQMA, in addition to the bus gate enforcement, (including improved phasing of traffic lights on the bus priority route to enable smoother traffic flows; a review of on street parking and enforcement; a review of commercial deliveries; advanced ticketing to reduce bus waiting times).
- e. Require Environmental Health to review the statutory powers under The Road Traffic (Vehicle Emissions Etc) Regulations 2002 to request drivers to switch off vehicle engines being run unnecessarily, to decide if this will be a feasible option for reducing traffic emissions within the AQMA.
- f. Require Environmental Health to review the statutory powers under the Road Traffic (Vehicle Emissions Etc.) Regulations 2002 to conduct roadside testing of vehicle emissions, to decide if this will be a feasible option for reducing traffic emissions within the AQMA.
- g. Require Environmental Health, in consultation with Oxfordshire County Council where necessary, to assess the cost effectiveness of the measures agreed, the time scales for implementation, and confirm who would ultimately be responsible for implementation.

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## **Glossary**

**AQAP:** Air Quality Action Plan.

**AQMA:** Air Quality Management Area.

**DEFRA:** Department for the Environment Food and Rural Affairs.

**DfT:** Department for Transport

**LEZ:** Low Emission Zone

**LTP:** Local Transport Plan

**NOx:** Nitrogen Oxides a collective term referring to nitrogen dioxide (NO<sub>2</sub>) and nitric oxide (NO).

**µg/m<sup>3</sup>:** microgrammes per cubic metre.

**Response from DEFRA (Action Plan Helpdesk) to Draft Air Quality Action Plan**

**SCHEDULE 11 (2) ENVIRONMENT ACT 1995: CONSULTATION ON OXFORD CITY COUNCIL'S DRAFT AIR QUALITY ACTION PLAN DATED JULY 2005**

Oxford City Council has declared an AQMA in the City Centre on the basis of road traffic emissions and the predicted exceedence of the annual mean NO<sub>2</sub> objective in 2005. The draft action plan dated July 2005 is the current draft out for consultation and sets out the context of the air quality problems faced by the city and close consideration to those existing policies that may assist in improving air quality. The plan additionally considers a number of measures currently not in place that could improve air quality across the AQMA.

The Action Plan has a clear identify and recognizes the links with the Local Transport Plan and the new shared priority on Air Quality. The plan provides a clear context to the emission sources that contribute significantly to the air quality problems in the city (i.e. buses and HGVs) whilst additionally identifying what reductions in NO<sub>x</sub> emissions are required (68% average across the AQMA) to achieve the annual mean objective for NO<sub>2</sub>.

The main focus of attention with respect to the scenarios tested is that of proposals targeting emissions from buses and HGV, which include a Low Emission Zone and bus and freight quality partnerships. This seems wholly appropriate given the nature of the emissions source and its contribution to the predicted annual mean exceedences.

For each proposed new measure the plan discusses the way in which further enforcement or implementation can assist in improving air quality. Impact assessment has been undertaken where possible, although it is unclear whether this has been modeled, or whether the assessment is based on professional judgment of the appointed officer. **The plan would be improved through the inclusion of a fuller discussion on impact assessment.**

The suite of proposed measures includes those that we would expect to see for an AQMA targeting road traffic emissions, with an appropriate emphasis on the main emission sources (i.e. buses and HGVs). Moreover, the plan contains a balance between those measures collectively referred to as "Smarter Choices" (travel plans, bus quality partnerships, promotions of cycling and walking, etc) supported by 'intervention' schemes such as roadside emissions testing and a Low Emission Zone. Table 5 provides a summary of the proposed measures and a comparative assessment of the reduction in NO<sub>x</sub> likely to be realized. It is evident that the LEZ proposal provides the greatest benefit to the improvement in air quality within the AQMA. Retro-fitting of clean technology to the vehicle fleet and the use of cleaner fuels additionally bring about a higher level of benefit.

**The plan does not include any consideration to wider-scale impacts (non air quality impacts) nor does it set out the time-scales for implementation of any proposed measures and the necessary bodies/organizations that would be responsible for the implementation of the specific measures.** The plan should include such detail.

Links with the Local Transport Plan are recognized. The LTP affords new funding opportunities to authorities in respect of AQMAs and the implementation of action plans. **The current plan does not provide sufficient detail in respect of funding issues.**

The current plan is a consultation draft. **We anticipate that the final plan should reflect the outcome of the current consultation and highlight the opinions of a wide-range of relevant stakeholders.** Moreover, it is important that the final plan provides a consensus between the bodies/organizations responsible for implementation.

Overall, the action plan provides an appropriate context to the problems faced by the city council in respect of its AQMA and appears to focus on the relevant emission sources. The plan has a clear identity, which bodes well for any integration into the LTP and the setting of further targets under Mandatory Indicator LTP8.

The following key areas require further work in order for the plan to be considered acceptable:

- Inclusion of further details on the approach to impact assessment
- Wider consideration to non-air quality impacts
- Further evidence on the perceived costs for implementing the measures
- Inclusion of time-scales by when measures will be implemented
- Identification of the bodies/organizations responsible for implementation of the proposed measures
- Outcomes of the consultation with specific emphasis on how the consultation process has influenced the Council's approach to implementation

This commentary is not designed to deal with every aspect of the report. It highlights a number of issues that should help the local authority in formulating its Action Plan.

Issues can be followed up through the Air Quality Action Plan helpdesk as follows:

Helpdesk telephone: 020 7902 6130  
Helpdesk email: [actionplanhelp@stanger.co.uk](mailto:actionplanhelp@stanger.co.uk)  
Web-site: [www.stanger.co.uk/actionplan](http://www.stanger.co.uk/actionplan)

## APPENDIX B

### Responses from Oxfordshire NHS Primary Care Trust to the Draft Air Quality Action Plan

Oxford PCT	2/12/2005	Little concern shown to health issues or health inequalities. Needs to be a formal health impact assessment on the proposals, to account for where is pollution burden highest? Is there any correlation between this and burden of local respiratory disease? Has any consideration been given to how transport policy may impact on quality of life for the most disadvantaged by increasing noise and air pollution? Why has not more been made of cycling and pedestrianisation as positive health impacts? Are public to be educated about the impact of informed choices? What is the impact of changing transport policy on accessibility to shops, schools & public amenities for people with and without their own transport? Need to consult with a wide range of health partners. PCT can provide expert advice on such matters.
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**Response from Oxfordshire County Council to the Draft Air Quality  
Action Plan**

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**OXFORDSHIRE  
COUNTY COUNCIL**  
**ENVIRONMENT & ECONOMY**  
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4 January, 2006

**Direct line: 01865 810443**

Dear Mr Pitman,

**Air Quality Action Plan – Consultation**

In response to the draft Air Quality Action Plan produced by Oxford City Council, Oxfordshire County Council recognises the need act as levels of Nitrogen Dioxide are above national standards set in the Air Quality Regulations. Although it should be noted that all other named pollutants in those regulations are within the standards set for Oxford. As the remaining pollutant problem is traffic related it is essential that actions are agreed jointly and fully incorporated within Oxfordshire County Council's Local Transport Plan (LTP). We note that the guidance from both DEFRA and DfT requires a co-ordinated and consensual approach to an Air Quality Action Plan from both District and County, therefore it is imperative that a plan endorsed by both Councils is agreed.

I would reinforce the need to take a balanced approach on the potential measures as there a number of competing interests; we should note that air quality has generally improved in the central area over the last 10 years, in spite of no change in the last 3-4. Most important we recognise that problems should not just be shifted from one location to another.

We note that the targets in the Air Quality Regulations 2000 are not likely to be met in Oxford and many similar towns and cities. Whilst this is the case, DEFRA and DfT expect us to be setting an achievable target over the lifetime of the LTP up to 2011. This is mandatory in the LTP and will need to be

agreed as part of the Air Quality Action Plan. Monitoring throughout the plan will require co-ordination between authorities, in addition to the need for more detailed cost/benefit assessment of measures as they are taken forward for final approval. It would be beneficial to also include wider health benefits assessment as we develop the plan.

Most of the measures under discussion have come from joint consideration by both authorities and we should reach an agreed document to submit to DEFRA and DfT in March 2006, work to agree these detailed measures needs to continue between both authorities to conclude the final Action Plan.

Yours sincerely,

Samantha Tharme  
Principal Transport Planner  
Oxfordshire County Council

cc. Steve Howell, Peter Mann, Michael Lawrence

## APPENDIX D

### Response from Environment Scrutiny Committee to the Draft Air Quality Action Plan

Environment Scrutiny Committee	28 <sup>th</sup> November	<p>Recommend to Executive Board that:</p> <ol style="list-style-type: none"><li>1. City centre air quality objectives be clearly integrated into the Local Transport Plan (LTP)</li><li>2. The LTP places air quality as the top priority in its weighting measures for projects within the city</li><li>3. The LTP should include the following actions from the Air Quality Action Plan as a priority:<ul style="list-style-type: none"><li>• Bus Gate Enforcement</li><li>• Bus Quality Partnership</li><li>• Retro fitting</li><li>• Clean fuels</li><li>• LEZ, including a feasibility study</li></ul></li><li>4. The measures outlined in the Air Quality Action Plan be implemented immediately with a timetable for action and implementation to be submitted to the Scrutiny Committee.</li><li>5. A discussion paper setting out the options for nitrogen dioxide targets is submitted at a future meeting of the Environment Scrutiny Committee</li><li>6. The Environmental Impact Assessment of the Westgate Centre development is submitted to the Environment Scrutiny Committee as part of the consultation on the development</li></ol>
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## APPENDIX E

### Responses from Area Committees to the Draft Air Quality Action Plan

Area Committee	Date of Meeting	Response
Cowley Area Committee	2 <sup>nd</sup> November 2005	Agreed to note the report
South East Area Committee	7 <sup>th</sup> November 2005	Resolved to note the report
Central South & West Area Committee	8 <sup>th</sup> November	Resolved that the Committee believes that the County Council should create a Low Emission Zone in the city centre Air Quality Management Area by 2008, and that challenging targets should be set for buses requiring the use of cleaner fuel and the retrofitting of tailpipe technology on buses
North East Area Committee	15 <sup>th</sup> November	Resolved to note the report
East Area Parliament	16 <sup>th</sup> November	Resolved that: <ul style="list-style-type: none"> <li>(1) The introduction of a low emission zone in central Oxford and further work to extend the Air Quality Management Area into East Oxford be supported</li> <li>(2) It was believed that more could be done by the Councils to improve air quality, e.g increasing roadside monitoring of polluting vehicles and more check-ups of city taxis.</li> </ul>
North Area Committee	1 <sup>st</sup> December	Agreed: <ul style="list-style-type: none"> <li>(a) To note the report</li> <li>(b) To request the Executive Board to adopt the powers to allow roadside testing of vehicles to be undertaken</li> </ul>

**APPENDIX F**

**Response from the Oxford Bus Company to the Draft Air Quality Action Plan**

Name	Date received	Summary
Oxford Bus Company	1 <sup>st</sup> December 2005	<p>A detailed response report.</p> <p>Oxford Bus Company (OBC) accepts the need to reduce emissions from buses in central Oxford rather than reducing the number of buses or re-routing buses away from the centre. OBC are the largest bus operator in the City and have pursued a replacement policy to introduce the cleanest available diesel buses. An independent survey commissioned by OBC shows that OBC bus fleet is one of the cleanest of large operators in the whole of the UK. They contest some of the traffic data that suggests bus movements have increased by 14% since OTS. Future developments are possible in alternative fuels and development of low emission engines and exhaust after treatments, particularly to EuroIV. Vehicle replacement policy should reduce NOx emissions by approx 29% over the period of the next LTP. OBC supports LEZ and introduction of vehicle labelling scheme to show relative emissions of buses. Do not agree with conclusions on bus de-regulation or cross-ticketing.</p> <p>Believe that a range of measures should be considered:-</p> <ul style="list-style-type: none"> <li>Bus Gate enforcement</li> <li>Bus engine switch –off</li> <li>Taxi Quality Partnership</li> <li>Reduce Bus boarding times</li> <li>Bus priority route – reduce congestion, reduce on-street parking, remove obstructions</li> <li>Publicise air quality policy, application of star ratings to OBC buses.</li> </ul>

## APPENDIX G

### Responses from Other Consultees to the Draft Air Quality Action Plan

Name	Date received	Summary
St John's Street and Area Residents Association	17/10/2005	<p>Make the document more understandable to the lay reader. Low priority for Air Quality within County Council's shared priorities is quite unacceptable. Key is to reduce bus and HGV pollution. Relocate buses as part of new Westgate proposals. Introduce Eu3 by 2007, Eu4 by 2009 for buses? Standards for HGV's? Emission testing?</p> <p>Vehicle congestion charging not mentioned. Evidence of rat runs in City to avoid A34? Document lacks conviction</p>
North Hinksey Parish Council	28/11/2005	<p>Encourages the City to take appropriate actions to improve air quality in the Air Quality Management Area</p>
Bus Users UK		<p>Investigate impact of parking measures in more depth, suspect estimates are too low. Terms of reference of AQAP are too narrow; other radial routes are subject to high traffic levels with congestion on Botley, London, Abingdon, Banbury &amp; Woodstock Roads. Not only buses but general traffic on these roads. Should consider other pollutants and greenhouse gases. LEZ would curtail penetration of the City centre by buses and result in increase in private traffic. Levels of private traffic and congestion not perceived to be a major cause of the problem. Proposals would result in loss of amenity to bus users, we oppose this. Also impact on economic viability of City Centre.</p>
Cyclox	2/12/2005	<p>Reductions in motorised vehicle use are not embedded in the plan. No mention of the impact of Westgate development on Air quality. Support of Westgate is inconsistent with objectives of the AQAP, due to extra traffic generated. Plan is unbalanced, based on technical fixes; ignoring impact of smart choices of non-motorised travel should come first. Response includes 8 detailed comments. Details in letter.</p>

OX1	3/12/2005	Need to link environmental and economic impacts within assessment process. Timescales for implementation should be realistic. Bus deregulation working against improved environment. Concerned by options to ban traffic from central Oxford. Suggest full economic impact assessment of air quality measures. Full consultation with business community required before decisions taken. Examination of alternative means to access city centre. Media relations strategy to manage and inform media of activity. OX1 willing to work with Oxford City Council to improve the economy & environment.
Oxford Pedestrians Association	2/12/2005	<p>Strongly support measures, particularly</p> <ul style="list-style-type: none"> <li>LEZ for all vehicles</li> <li>Reduction in number of all vehicles</li> <li>20mph zone throughout the City</li> <li>Bus Gate Enforcement</li> <li>Bus Company operations:- <ul style="list-style-type: none"> <li>Less polluting fuels</li> <li>Ticketing to reduce delays</li> <li>Less duplication of services</li> </ul> </li> <li>Better management of commercial loading</li> <li>Reduce central Area parking</li> <li>Invest in walking and cycling strategies to reduce the need for private car use</li> </ul>

**Responses from the General Public to the Air Quality Questionnaire**

Public Questionnaire Responses

1. 91 responses were received, of these:

97% of responses were from Oxfordshire residents  
80% of responses were from Oxford City residents

77% of respondents work in Oxford  
13% of respondents work in Oxfordshire  
10% of respondents work outside of Oxfordshire

2. In response to the question about air quality in central Oxford

1% thought air quality is very good  
3% thought air quality is satisfactory  
21% thought air quality is moderate  
32% thought air quality is poor  
42% thought air quality is very poor

3. In response to the question about levels of road traffic in central Oxford

0% thought levels of road traffic are very good  
4% thought levels of road traffic are satisfactory  
22% thought levels of road traffic are moderate  
34% thought levels of road traffic are poor  
40% thought levels of road traffic are very poor

Thus 74% of those questioned thought air quality and road traffic levels are poor or very poor in central Oxford

4. Of those questioned, 50% had used some form of motorised transport as part of their normal daily travel (more than one answer given)

20% used a car, (inc car share or car passenger)  
3% used park & ride  
11% used a train  
31% used a bus or coach  
56% walked  
54% cycled

72% of regular single journeys were less than 5 miles

5. 98% thought that good air quality is important or very important for health  
63% thought that good air quality is important or very important for attracting business and jobs  
96% thought that good air quality is important or very important for protecting nature and the environment  
97% thought that good air quality is important or very important for making the city a good place to live and work in
6. In order to improve air quality in central Oxford,  
  
90% thought that limiting access to the city centre only to cleaner vehicles was important or very important  
  
90% thought that restricting traffic access to the city centre during busy periods was important or very important  
  
64% thought that reviewing parking charges was important or very important  
  
95% thought that promoting alternative means of travel was important or very important  
  
88% thought that improvements to public transport services was important or very important  
  
67% thought that development of intelligent transport systems for congestion control was important or very important
7. 52 people responded to a question about charging vehicles to enter the city centre in busy periods in order to improve air quality. 60% of respondents thought it was important or very important.
8. In response to the question, do you think that environmental policies (e.g. reducing air pollution, transport planning, and urban development) are properly co-ordinated at local level.  
  
60% think that they are rarely co-ordinated or never co-ordinated.

## APPENDIX I

### General Public Written Comments on the Draft Air quality Action Plan

Report vehicles emitting visible pollution
Promoting safe walking/cycling.
I would reward with re-election strong political leadership that set environmental targets and realised that highly coordinated transport and development planning policies (up to and including county-level) are necessary even to deal with specific localised issues (such as the AQMA). I would support a Council Tax that provided adequate resources for this need providing the restructuring and indicators for success were transparent.
Cycle or walk everywhere within the city centre; only catch buses that use cleaner fuels (gas/biodiesel) and have low emissions
Get used to a bus service that was less frequent
I would support a tram system
Cleaner buses and less cars in central Oxford is the answer - start by getting rid of the open-top tourist buses that pollute the most and have few if any benefits in a city like Oxford. I already cycle and walk everywhere, but I would like to do whatever I can to help.
Enforce the ban on private motorcars in the central area. Encourage the bus companies (including tour buses) to invest further in low emission/hybrid vehicles. Provide more cycle parking racks to encourage cycling.
See fewer buses that are empty or near-empty. More 'intelligent' traffic light controls. Review the High St road closure - it adds to pollution more than it helps congestion.
Use bikes or bus all the time if fares reduced. Car parking charges should be increased to deter drivers-it is cheaper for me to drive in and park than get the bus from Headington!!
Catch the bus if the bus fares and park and ride parking fees remain the same.
Ban diesel buses in the city centre and reduce number of buses to make the environment and shopping more enjoyable - Pedestrianise entirely -No buses at all on the two main streets. Otherwise people will go elsewhere - I have since the changes in Oxford centre - Park and Ride is a joke - its cheaper and easier to park in Multistorey and only stay two or so hours
Force more people to walk rather than using cars/buses etc. Oxford is a very small town, there is absolutely no need for
Use car less if public transport were more efficient and regular
Buses are a big threat to pedestrians and cyclists.
Some cycle lanes are too narrow and the police do nothing when a car is parked on them.
I'd like to see Central Oxford closed to traffic or a high congestion charge placed to deter traffic.
Cycling and walking in town rather than driving
Shout at bus drivers that block the road sitting at bus stops waiting, with the engine on, for the next driver to turn up or the timetable to "catch up" with them.
Walk and cycle instead of taking the bus.
I would be willing to cycle only, or be willing to help campaign for cleaner buses or replacing buses with a cleaner alternative-- trams (which I think is the ideal solution). I would also be willing to campaign for banning cars from most of the city centre.
Use car less if public transport were more efficient and regular

Headington Hill is too dangerous to cycle to.
Buses are a big threat to pedestrians and cyclists.
Some cycle lanes are too narrow and the police do nothing when a car is parked on them.
Provide more parking spaces for cyclists.
Many cyclists go from the north (Univ. Science Area) to the east Cowley/Blackbird Leys/affordable housing through New College Lane but the gate in that lane force them to slow down. Could this be changed? Could mirrors be installed to allow them to see incoming traffic?
Car sharing / Car club
I had a car that I do not often use, so I bought a cheap one (thus probably not very clean). If instead I could use a car from a club/pool I would have access to a cleaner car and I might also save money in the deal!
Already have words with the drivers of dirty exhausts.
Report smokey buses and lorries now I have bothered to find the phone numbers