

## Public Consultation for draft Air Quality Action Plan running from 17 July to 17 September 2013 - Open Response Summaries

The summaries of open responses have been ordered to reflect the main themes in the draft AQAP

	Summary of comments	Response
Generic	Emissions and monitoring targets in AQAP	Included
	Separate targets for AQ and Carbon needed, plus define clear baselines	Monitoring undertaken complies with Defra guidelines
	Need direct, not indirect AQ monitoring	Several actions included which will help address this.
	Need a strategy for reducing diesel emissions to achieve AQ objective(s)	Noted, not progressed
	Consider emissions ceilings requiring closure of activity when attained	Targets included
	AQAP only aspirational targets rather than clearly defined and scheduled measures	Noted, AQMA is declared for Nitrogen Oxides
	No breakdown of PM emission sources; detail on other transport NOx sources;	The aim is to capture emissions that contribute to air and climate impacts
	No details on balance between AQ and climate emissions	AQAP does not seek to address emissions from construction. They are addressed via construction management plan.
	No proposal to consider measures to reduce small particle emissions from construction	Evidence base will be further developed.
	Insufficient evidence base on air pollution and specific impacts of proposed reductions	This is available
	Source apportionment needed at hot-spots	Realistic AQ target that reflects local programmes has been developed
	AQ target too lax, 40ug/m3 by 2020 latest	This is proposed
	Agree to robust monitoring & assessment for implemented measures	For new developments train emissions are addressed through assessments carried out under Planning Regulations. For existing emissions are addressed through nuisance legislation.
	Diesel train emissions – inc. Jericho sidings (a concern)+ (monitor with diffusion tubes?) No consideration of emissions from idling trains at Jericho sidings Pollution from freight trains ignored, inc. Evergreen 3 scheme, and strategic freight route Road speed reduction mentioned but not rail freight speed reductions	Cost-effectiveness will be addressed as measures are developed through the AQAP

	Support for improvements in air quality to reduce damage to historic stone buildings	Agree
	No proposal to address emissions from industrial installations and waste facilities	Industrial emissions addressed through IPPC Regulations
	OCC has duty of care to residents affected in hotspots in intervening years. AQAP fails to address this.	The County Council implement a large range of local transport measures contributing to improved air quality, assessments in hotspots are ongoing and reported annually by the City Council
	Consider Schools education programme, "Clean Air for Schools" as per London Boroughs	For future consideration
	Better public presentation of Diffusion tube air pollution levels, on-line map of results	Work in progress to develop County-wide AQ web site
	AQAP mostly human aspects of pollution, AQMA including special area of conservation(SAC),Oxford Meadows, exceeds critical load for N-deposition Include biodiversity, and protect Special Areas of Conservation, e.g; Oxford Meadows	These aspects are considered through Planning process
	AQAP has insufficient detailed plans	Aim is to develop in more detail

Theme 1: A City-wide sustainable travel strategy-building on work of the LTP, focussing on reducing car traffic, promoting low emission public transport, investment in walking & cycling & public transport	
Summary of comments	Response
LEZ doesn't address buses as major source, transfer problem to residential areas	LEZ was assessed on the relative contributions of all vehicles and other sources
Closing roads counters reducing congestion (e.g Broad St , Keble Rd, Queen St)	There is a balance between creating more pedestrian or cycling space and space for motor vehicles
Removing bus stops from Queen St, shifted the problem to St Aldate's Closing Queen St will make matters worse	
Overall strategy should be linked to Quality of Life objectives based on user categories: Resident; visitor; business; Consider related local data, i.e health response data. Categories should be sub-divided : Pedestrian; cyclist; EV user; Petrol/Diesel user	The overall strategy is based on maximising benefits to all
Pollution is linked to economic activity	Our aim is to promote sustainable growth that minimises pollution
Inadequate traffic management to promote walking and cycling	Promoting walking & cycling are key local priorities in Oxford
AQAP needs to be a part of an integrated social policy	AQAP aims to complement LTP as an integrated strategy.
No mention of measures to address:- School traffic New Chiltern train line & local station at Water Eaton Additional cycle parking provision, safer cycling tracks	School travel plans are in place for most schools
City-wide sustainable travel strategy, requires:- Proper cycle paths, education of cyclists, licensing cyclists Promote excellent P&R further Reduce congestion at hotspots; consider 1-way on ring-road?;closure of city centre to daytime traffic	These measures are included within the current transport strategy, promoted through the Oxford Area Plan
Consider more measures than required by legislation alone-congestion free traffic; infrastructure to support cycling and low emission public transport; cycle safety measures;	Measures to reduce congestion are a priority in the LTP

	<b>Summary of comments</b>	<b>Response</b>
	Require audit on implementation of travel plans	Measures will be developed further in the Oxford Areas Plan of the LTP in partnership with the County Council who is in charge of the delivery of these measures.  The action plan supports sustainable travel measures and developments set out in the LTP and liaison with County will continue as the Oxford Area Plan is updated.
	Improve buses between rail station and city centre, poor linkage between bus services	
	Consider a managed “token” lift-share scheme	
	Improve pavements between station and city centre, especially Park End Street	
	Make cycling safer, better infrastructure, segregated lanes, cycle filters, adult cycle training	
	No proposals to re-develop junctions to reduce pollution hotspots, or mitigation plans for each hotspot, or monitoring stations at each hotspot	
	Need more details of bus routes and bus traffic	
	Consider benefits from traffic reduction & demand management measures as Work Place Parking Levy, modal shift to active travel & imp health	
	Apply for Grant to LSTF for assessment of Workplace Parking Levy & traffic reduction	
	Support effective cycling & walking plans	
	Support further LEZ for buses	
	Concerns over charges at P&R...detrimental?	
	Consider work place parking levy?	
	Consider Economic analysis of private bus companies? Bus travel expensive	
	Little advance on walking from previous suggestions – need clear strategy with practical steps	
	Need active policy to discourage polluting vehicles – pollution charge?	
	Prioritise pedestrian measures in St Aldate’s	
	Further reduce traffic in city centre & residential bus routes	
	Consider reducing parking provision except for disabled	
	Many streets have high pollution from cars and vans	

	<b>Summary of comments</b>	<b>Response</b>
	Important to continue to limit non-essential traffic flows into city	Measures will be developed further in the Oxford Areas Plan of the LTP in partnership with the County Council who is in charge of the delivery of these measures.  The action plan supports sustainable travel measures and developments set out in the LTP and liaison with County will continue as the Oxford Area Plan is updated.
	Make centre more attractive for walking and cycling	
	OTS positive for dealing with motor vehicle congestion (+Air pollution) – Transform Oxford made matters worse...limits use of bikes, and make cycling less inviting.	
	Need clear thinking on active travel, + use of bicycle in particular. Too many vehicles. Suggest 2-pronged approach:- <ul style="list-style-type: none"> <li>• Public Transport inter-connectivity – hub + oyster card type tickets.</li> <li>• Consider trams to alleviate pollution</li> <li>• Positive approach to cycling to enable 2-3 x increase in cycle journeys. Involving more segregated + continuous lanes on main roads. Massive increase in secure cycle parking.</li> </ul>	

Theme2: Support for the uptake of low and zero emission vehicles. Building on bus based LEZ. Promote EV infrastructure, uptake of EV's, and Low Emission Vehicles, Eco-driving, anti-idling policies.	
<b>Summary of comments</b>	<b>Response</b>
Positive response by Council for promoting bus operators improvements	LEZ is seen as one step in promoting low emission vehicles
Disagree with Promotion and uptake of LEV's; bias towards those who can afford them	LEV's are seen as further step in promoting sustainable travel
Support Bus LEZ proposals, extend to other vehicles, e.g London	Future consideration
National NO2 problems acknowledged by DEFRA – requires wider strategy for emissions reductions, including limiting traffic, & reducing wide range of classes of vehicles	Full range of measures is recognised
Support anti-idling policy for buses, extend to trains? Ref Jericho sidings No proposals to reduce idling of diesel trains to a max time period, when planning proposals are current	Anti-idling is within current LEZ scheme. Issues relating to trains are addressed under nuisance legislation rather than the AQAP
Support low & zero emission cars for car clubs and fleets	An EV car club is to be launched in Oxford by the end of 2013
Eco-driving for bus drivers?..is it mandatory?	Main bus companies have schemes, others to be encouraged
All buses and taxis upgraded in line with LEZ standards Parking charge incentives for LEV's No proposal to provide incentives for and availability of alternative fuels	For further consideration Potential for consideration in future Incentives for alternative fuels must be set at a national level.

Theme 3: Reducing Freight Emissions from Light Goods Vehicles and Heavy Goods Vehicle. Consideration of Freight LEZ, Freight Consolidation	
Summary of comments	Response
<p>Support LEZ for freight</p> <p>Support freight consolidation &amp; anti-idling for freight &amp; delivery vehicles &amp; trains</p>	<p>City &amp; County Council are seeking funding to carry out a feasibility study into freight consolidation in Oxford. An initial workshop involving local stakeholders has already taken place. Included in the AQAP.</p>
<p>Acknowledge no single cause or solution</p> <p>Continue with measures to tackle bus &amp; coach emissions &amp; promote LEV's to all users</p> <p>Concerned over proposal to ban HGV's from central Oxford by consolidation centres. Local deliveries by light vans could make congestion and pollution worse</p> <p>Require greater clarification on proposals to promote uptake of LEV's by Road haulage Industry</p>	<p>Options to develop a freight quality partnership are included in the AQAP as a means to develop a dialogue with the freight industry.</p>

Theme 4: Planning for Sustainable Transport. Opportunities through new developments for investment in new infrastructure to support sustainable transport. Use of Community Infrastructure Levy (CIL) to support sustainable transport projects.	
Summary of comments	Response
<p>Need to promote P&amp;R over Westgate, by:</p> <ul style="list-style-type: none"> <li>• Convert buses to LPG</li> <li>• Buses different roads for different routes</li> <li>• Promote Low Emission (hybrid/electric) Taxis</li> <li>• Promote freight consolidation</li> <li>• Entry charge for diesels wanting to enter Oxford</li> <li>• Roadside Emission testing</li> <li>• Manage cycle parks- remove dumped cycles</li> <li>• Manage cycle lanes and footpaths (gritting) in bad weather, ahead of roads</li> </ul>	<p>This will be part of the consideration of a planning application.</p>
<p>Westgate expansion will generate more traffic and create more problems</p>	<p>The environmental impact of the development is assessed within the planning process</p>
<p>No planning restrictions in relation to safe distance of new housing from polluting roads, junctions or rail lines. No proposal to ensure air quality assessments take place at planning application stage No proposals to increase suitable tree species for new developments</p>	<p>Impacts of Developments, including mitigation measures are considered at Planning stage.</p>
<p>Fails to provide measures to address:-</p> <ul style="list-style-type: none"> <li>• Reducing pollution at Wolvercote Roundabout to 2020,</li> <li>• in relation to current projects :- Network Rail-Strategic Freight; Chiltern Evergreen 3;OCC Core Strategy –including housing &amp; jobs; N. Gateway &amp; Westgate - doubling of retail space; Expansion of Universities &amp; tourism.</li> <li>• All will result in significant increase in pollution, at hotspot (Wolvercote Roundabout?)..thus targets unachievable.</li> </ul>	<p>All major projects are subject to Environmental Assessment, including air quality impacts through the planning process.For further consideration. Air quality may be taken as a material consideration within planning applications.</p>



	<b>Summary of comments</b>	<b>Response</b>
	Support plans, highlight better infrastructure for cycling / walking & use of EV's	Part of planning process, not to be addressed by AQAP directly.
	New Westgate making cycling more inconvenient	
	Barton Master Plan exemplary, but cycling unattractive in crossing dual carriageway	
	Oxford Station Masterplan brief is restricted in red-line & aspirations – leads to a dislocated transport environment, detriment to air quality.	

Theme5: Managing the Council's Transport Emissions. City & County Council's to demonstrate best practice on fleet management, to maximise reducing emissions across all fleet activities		
	<b>Summary of comments</b>	<b>Response</b>
	Support Council's example of fleet management	For further development, AQAP includes proposals to develop a procurement hierarchy to promote low emission vehicles

This page is intentionally left blank