

SODC Air Quality Action Plan 2014 consultation

This is the Watlington Parish Council response to the above consultation.

We welcome the fact that an AQAP has now been prepared for Watlington, even though it is over 5 years after the Air Quality Management Area for our town was declared and nearly 10 years since it was noted that the central area of town was close to exceeding the Air Quality objectives. There are measures in the AQAP that we are pleased to see, but also many areas where we do not believe the AQAP is adequate. Our comments are divided into three categories covering firstly general issues with the document; secondly District-wide measures; and finally measures specific to Watlington. Our overall view is that this is a lightweight document that has severely misjudged its audience.

SODC will be aware that there has been considerable concern about the air quality issue in the town, and its relationship to the traffic congestion at the pinch points in town. SODC would have seen at the public meeting in Watlington over a year ago the urgency with which the issue is regarded by many of the population. These people have not sat back waiting passively for the AQAP, but have involved themselves in traffic monitoring exercises as well as briefing themselves on air quality issues. There is a strong feeling from this group that the AQAP has been prepared for a “lowest common denominator” audience who are not informed on air quality. Why was it not possible to provide a two tier consultation document as has been done for the current SODC Local Plan 2013 Issues and Scope consultation? A detailed document could have addressed many of the issues raised in the following pages, while leaving those who do not wish to delve into the depths of air quality measurement, reporting and management with an easily understood document such as that provided for this consultation.

General

G.1 Quality of information provided: One of most frequent comments we have heard on the consultation document is that has been “dumbed down” with little or no supporting information to justify the information presented. Key questions are:

- What evidence is there that “other pollutants are well within the objectives and so no action is required” which is used to support the use of NO₂ as a measure of pollution throughout the document?
- There is considerable comment in the media about fine particulates (PM_{2.5}) being the most dangerous on health grounds. Has the PM_{2.5} concentration ever been measured in the District? We understand that, with the exception of urban canyons (such as Couching Street and Shirburn Street), the rural background level of fine particles is the dominant component of the PM_{2.5} measurements in urban areas[1]. Surely the exception for urban canyons justifies for need for local measurements of PM_{2.5} to support ignoring fine particulates in AQMA in the District, all the result of emissions trapped in narrow streets between buildings.
- The source of NO₂ is shown for each AQMA divided across different vehicle classes. How has this been measured? Simple arithmetic checks show it is not a simple scaling from the fraction of vehicles in each class, even when allowance is made for rounding errors. For example, the Henley and Watlington proportions of vehicles for each class are virtually the same, but the emission contribution from LGVs in Henley is nearly twice as large as that in Watlington. Similarly, the fraction of LGVs in Wallingford is half that in Watlington, but for both towns the contribution to emissions from these two classes is the same.
- On the same topic, we are puzzled by the differences between the versions of diagrams made available to us in 2011 and the version published for this consultation. The division of traffic between the 4 classes is virtually unchanged over the two years, but the fraction of

emissions from cars has increased considerably while the fraction from HGVs has decreased commensurately.

- Can you justify the use of 2010 air quality data in 2014 when more recent data is available, and incidentally would show a decrease in the pollution levels?
- What is the source of your traffic flow data? We are very aware that the mix of vehicles on our roads changes considerably with time of day and with day of week. HGV traffic is higher in the early mornings and on Mondays and Fridays. Nothing less than a full 24/7 survey could provide a robust estimate of the breakdown between vehicle classes. Do the traffic flow numbers used cover a period corresponding to the emission figures? We have evidence from traffic counts that the number of vehicles passing through central Watlington has increased by up to 25% over the past 3 years.
- Is the contribution to pollution from other sources, such as domestic heating irrelevant? If it is, are there data that show the rural level of NO₂ in comparison with, for example, the background level of 15µg/m³ measured by diffusion tubes at St Leonards?

G.2 Definition of the AQMA: We can understand that the extent of the AQMA along Watlington's roads has been based on where the sensors showed high levels of NO₂, but how has the width away from the road been defined? Why is the AQMA so narrow and how was it decided which properties should be inside or outside area? Particular points which look odd are the area around the Cuxham Road / Britwell Road junction, and the area around the Town Hall where, for example, only half of the building on which the diffusion tube monitor is mounted is included.

G.3 Cost benefit assessment: Although the AQAP does not attempt a full cost-benefit assessment of the options it does provide a rough classification scheme. We are concerned that this might be used to prioritise actions without a more realistic cost benefit assessment of each option being carried out. The bands for High, Medium and Low air quality impact look very poorly defined. We would be surprised if it were possible to estimate the potential air quality impact for any of the options within accuracy of better than a factor of 2 at this stage, but a factor of 2 is the difference between a Low and a High impact. In effect the present classification has no value, and a far more detailed assessment will be needed to guide prioritisation of options.

There is no indication in the document of how the costs were estimated, but it looks as though it is purely the cost of carrying out the work. A true benefits assessment should take into account all aspects of health impacts, including the value of preventing fatalities and the health costs associated with long term chronic illness^[2]. It would then be possible to balance the cost of doing the work against the health and social cost of not doing the work.

G.4 Selection of options: Which options are selected for consultation is clearly a matter of judgement and we would have been worried if unrealistic options had been included. However we do have some issues with the selection of options:

- Is it reasonable to dismiss options before going out to consultation, without any real evidence of assessment of the options? Of particular concern to us here is the decision to reject a relief road for Watlington (not a bypass which would be an altogether larger scale project). The fact that it is not included in the OCC Local Transport Plan is not a reason to exclude it. It was included in the County's Network Review issued in 2004 but was dropped from LTP3 in 2010 with no consultation with the parish councils affected. OCC is currently preparing LTP4 so now is precisely the time that the need for a relief road is highlighted, rather than to say it is not possible. In addition, we are preparing a Neighbourhood Plan which will not be able to avoid the issue of a relief road. A major argument for including a relief road option in the AQAP is that it then strengthens the case for securing funding from other sources for at least parts of relief road.

- A suggestion about reducing the flow of unauthorised HGV traffic through the town that has been made repeatedly at the District-wide traffic group organised by our MP and should be included in the AQAP. The manufacturers and vendors of SATNAV equipment should be contacted to ensure that the routes through the various bottlenecks in the area (Henley, Watlington, Little Milton, Wheatley and others) are clearly shown as being unsuitable for HGVs.
- Increasing the awareness of air quality issues among residents of the District is a key factor in generating a self-regulating community that accepts the need for some changes in behaviour – look for example at the effect that the publicity associated with smoking restrictions has had on the public. Part of the AQAP should address the need for public awareness in a direct way. Is it possible to install air quality alert sensors and displays in the public areas of the affected communities, or to publish regular reports on air quality in parallel with pollen counts?

G.5 Management of the AQAP: SODC is required by legislation to produce an AQAP for the AQMAs declared in its area. Progress towards this has been slow with the requirement defined in the 1995 Act, the air quality objectives set in 2000 objectives, first warning of high levels of NO₂ in Watlington reported in 2005, continuous monitoring started in 2007, the AQMA declared in 2009, and the finally published in 2014. From the consultation document it appears that for the other two AQMAs, only three actions have been implemented since last AQAP, two of which were based on smoothing the traffic flow and have had no effect on NO₂ levels, and the third (establishing low emission zones) has effectively been carried forward into this AQAP.

This lack of progress may be because actions for implementation are dependent on other bodies, but SODC, having declared an AQMA, is surely responsible for making sure that these other agencies take the necessary actions as defined in the AQAP. As an example, the removal of a feasibility study for a relief road for Watlington was removed from the 2010 OCC Local Transport Plan without objection from SODC, even though this provided a realistic possibility of achieving significant air quality improvements within the Watlington AQMA. Similarly, an earlier recommendation for a feasibility study for another Thames bridge to relieve Henley's pollution problems was ignored in the Local Transport Plan.

Even within SODC there is a need for joined up thinking. The AQAP identifies the need to use the planning system as an aid to improving air quality, but the SODC planners recently decided that an environmental assessment was not needed for an application that is a significant source of traffic through Watlington on the grounds that the site was too far from the town and the AQMA it affects.

Our concern is that the AQAP will be accepted but that ensuring the necessary actions are taken by all parties will not be a high priority within SODC, and that the excuse that some other agency needs to take action will be used to justify failure to achieve the objectives. SODC **must** to be seen to be chasing these other agencies for action.

District-wide measures

The following paragraphs comment on each of the proposed District-wide measures in the AQAP, and are numbered consistently with the measures.

D.1 A District-wide LEZ, if achieved, will be of great benefit to the whole District but we do not consider that taking a national lead in examining the issues and finding solutions for an innovative rural LEZ is the most effective use of financial support while there are specific communities in the District that have urgent air quality issues. We fear that the District-wide LEZ will just distract attention from the needs of the three AQMA towns and that low impact measures across the broad area will be a rationale for declaring "success". We note that a

timetable is given for the study alone, but with no indication of a target date for the implementation of the LEZ. By all means participate in the work needed to determine how a District-wide LEZ might work, but do not rank as this as the number one action for resolution of the air quality problems of South Oxfordshire.

- D.2 *Electric vehicles*** are a prime example of the need to think globally, act locally when aiming to achieve environmental benefits. Wider scale use of electric cars in the current environment of dependence on polluting technologies for generation of mains electricity is an inefficient use of energy; we need to ensure low-carbon generation of electricity before increased use of electric vehicles can reduce pollution. With the closure of Didcot we are just exporting our problem elsewhere.

The use of electric vehicles will provide air quality benefits in the larger towns, but the uptake of electric vehicles is likely to be limited in the more rural areas where a round trip to the nearest of the District's towns is likely to be in excess of 30 miles. While this is readily achievable with current electric cars, it could be limiting for school runs where two such trips would be needed every day. Within the rural communities we want to encourage walking / cycling by ensuring that homes are within easy walking distance of most local services.

- D.3 *Parking incentives*** are of benefit to the larger towns in the District, including the two which have an AQMA declared, but is of limited benefit for the more rural parts of the District where for the most part parking is free anyway, and the introduction of parking fees, even for only some vehicles, could have a deleterious effect on the economy of these communities. Again this is of benefit to the larger towns but of limited benefit in rural areas.

- D.4 *Freight transport consolidation centres*** clearly have much to offer in reducing HGV traffic, but will not resolve all the problems of vehicles using rural South Oxfordshire roads as short cuts to the motorways. We regard the feasibility assessment as well worth doing, even if all it does is clarify the routes and distribution sites used by the existing freight traffic operations.

- D.5 *Taxi licensing incentives*** are of benefit to the larger towns in the District, including the two which have an AQMA declared, but will have a low impact on rural areas where use of taxis is limited on grounds of both cost and availability. Where taxis are used in rural areas it is either for longer trips into towns with bigger shopping areas or to meet needs that could be serviced by a better rural bus service.

- D.6 *Improved enforcement*** of traffic regulation orders is essential, but it is becoming apparent that the present arrangements for enforcement of the weight restriction zones are inadequate. Both Thames Valley Police and the County Council (Trading Standards) have repeatedly made it clear that they no longer have the resources to provide an adequate level of enforcement, most recently at the District-wide traffic group organised by our local MP. A new approach to enforcement is needed using a budget earmarked for this purpose, funded at least in part from penalties imposed on offenders. This is an area where it SODC might be able to provide some leadership, by establishing within its environmental health unit a small team aimed at organising enforcement action using local volunteer groups to support the official enforcement bodies. A specific example would be the provision of training and loan equipment to facilitate such volunteer groups.

- D.7 *Review of the council and contractors fleet*** should be a routine part of the councils' activities. However use of greener vehicles is only part of the problem. Reduction in the number of trips necessary (for example by locating all staff responsible for specific activities at the most appropriate location) and driver education (see D.8) are also needed. It is not clear that use of biodiesel will reduce air pollution problems – it might reduce the carbon footprint of the District but is there any evidence that biodiesel produces less harmful exhaust gases?

- D.8 *Eco driver training*** would only reach a very small proportion of the District's drivers, and in some parts of the District much of the traffic does not originate locally. While encouraging better driving practices would have many benefits, these are unlikely to have a significant impact on air quality for the District.
- D.9 *Air quality planning*** requirements are not restricted in the national legislation to planning applications within an AQMA; this is how SODC has chosen to interpret the requirement. The need to consider the air quality implications of new build or change of use applications should be enforced. If this requirement were universally the case then the argument that missing information would delay planning applications is largely fallacious – once it is established that it is as necessary to provide this information as it is to provide other information needed for planning applications it will be routinely provided.
- The benefit gained from the provision of this information is only realised if the requirements are enforced by the planning authority. This means that SODC will need to ensure that if an insufficient or inadequate air quality impact assessment is provided, the application is not granted permission.
- D.10 *Community involvement projects*** are needed to ensure that the measures introduced to reduce air pollution are adopted and applied by the local communities. Your statement that you cannot improve air quality on your own is very true, which raises the question of why more specific measures are not suggested or considered. Simple measures such as internet pages, newsletters and posters could do a lot to increase awareness of the issues by encouraging less driving, not leaving car engines idling while waiting, more walking or cycling in local areas, improved home insulation, or using public transport where it exists. SODC could provide seed funding and promotional material for local groups interested in taking action to improve their local air quality.

Watlington Specific measures

Three specific measures are included in the AQAP for reducing the level of air pollution in Watlington. These are commented on in the following paragraphs.

- C.1 *A LEZ feasibility study*** specifically for Watlington has the advantage that the resulting LEZ will be more easily enforced than the current weight restriction zone, and so does have a good potential for improving the air quality in the town. It is nevertheless important that any actions proposed by the study are properly implemented in order to achieve any real benefits. As for D.1 above we note an end date for the study is given, but not for implementation of the LEZ. This study and the resulting actions (if any) must not be seen as an excuse for further delaying implementation of an AQAP that does actually improve air quality. In this connection we note that over a year has been lost in agreeing to include this study in the draft AQAP – this does not auger well for speedy implementation of a LEZ.
- C.2 *Enforcement of the weight restriction zone*** has already been commented on under D.6 above where it was suggested that SODC take a lead in organising this enforcement in conjunction with the community working with the police and trading standards.
- We agree that the current WRZ is too large for proper enforcement and the smaller area concentrated on key parts of the routes through the District could probably achieve more. We realise that cutting off one or more of the routes through Watlington could hugely reduce the HGV traffic through town, but only at the expense of neighbouring communities if carried out in isolation. A District-wide approach is needed, and for this reason we support a full investigation of the optimum arrangements for WRZs throughout the District.
- C.3 *Smoothing traffic flow*** through Watlington would be very desirable as current evidence suggests that idling engines, especially diesel, produce higher levels of pollution than when

loaded. However we advise extreme caution about how this achieved for the following reasons:

- As you have noted, the parked cars on Couching Street and Shirburn Street / Road already provide a very effective traffic calming measure albeit at the cost of much stationary traffic and associated exhaust fumes. Removal of the parked vehicles could speed up traffic along the two streets (which is not desirable) but concentrate the stationary traffic at the pinch points of the Couching Street/ Brook Street junction, the Town Hall cross roads and the narrowest part of Couching Street ;
- The two roads are both very narrow (as little as 5m in places), and is too narrow at the worst pinch points for two HGVs to pass, so some stop/start traffic is inevitable as long as large vehicles use the road;
- The pavements are very narrow, in places only just adequate for a wheelchair or large baby buggy, and fast vehicles present a real safety hazard when passing within inches of users of the pavements;
- The Dorset Villages model [3] is attractive in terms of the improved appearance it offers, but does not offer much for reducing the impact of large vehicles negotiating pinch points. We have concerns that the narrowness of the roads will mean that blurring the distinction between pavements and roads will encourage more use of the pavement areas by vehicles rather than providing more protection for pedestrians;
- We note too that the traffic calming measures introduced in Henley and Wallingford have produced no recognisable improvement in air quality in those towns. We would want to see evidence that removing of the current on-street parking would improve air quality in Watlington;
- Measures to speed up flow will have the inevitable effect of encouraging greater flow through the town. As OCC has failed to take on the issue of a transport review, no exact estimate of this increase can be given - it is enough to say it might be considerable. This would of itself act counter to the desire to reduce pollution. The effect of traffic calming measures should take account of any extra traffic that a faster route through town might generate.

For these reasons we would want to see a thorough investigation of the effects of removing parking or street markings before any changes are made. The measurable impacts given in the AQAP are that street parking is removed and other calming measures are introduced, which prejudices the outcome of any investigation. These success criteria should be replaced by "completion by 2016 of a detailed study of options for smoothing the traffic flow to reduce the stop-start nature of traffic movement through the pinch points".

We have given considerable time towards the examination of the document. We are candid. The recommendations fall woefully short of what is required for the towns that are in particular focus. We want to stress that the District Council has real responsibilities under legislation *to require* action by others. The document makes it appear that SODC is quick to 'understand' how shortcomings elsewhere have arisen (for example in county traffic planning) but slow and reticent in wielding its authority to ensure progress.

We ask that you give the comments and recommendations in this letter full attention.

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- 1 Fine Particulate Matter (PM_{2.5}) in the United Kingdom, Air Quality Expert Group, DEFRA, 2012
 - 2 Guidance Air quality: economic analysis, DEFRA, <https://www.gov.uk/air-quality-economic-analysis>, 2013

- 3 Traffic in villages - Safety and Civility for Rural Roads, Dorset AONB Partnership in conjunction with Hamilton-Baillie Associates, 2011