

Annex B

AQAP3 consultation questionnaire and responses

A 1.0 Consultation Questionnaire

An online consultation questionnaire was made available on the CYC website between 21 November to 2 January 2015. The following questions were asked:

What is your postcode?

Which of these statements best describes the views you have provided in this consultation response?

- I am a local resident and these are my personal views (please go to question 4)
- I am a non-York resident and these are my personal views (please go to question 4)
- These comments are provided in my professional capacity (please go to question 3)

What is your area of employment?

- Bus operator / driver
- Taxi operator / driver
- Freight operator / haulier
- Local authority officer
- Academic
- Consultant
- Charity
- Local business owner / employee (please state nature of the business)
- Other

Please state other/nature of the business here

4. Do you agree or disagree that the council should be working to reduce emissions to air?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

5. Do you agree or disagree that the measures in the draft AQAP3 will help reduce emissions to air in York?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

6. Are there any measures in the draft AQAP3 that you consider should be given greater priority?

7. Are there any measures in the draft AQAP3 that you have concerns about?

8. Are there any other measures that you would like to see included in the draft AQAP3 that are currently not included?

9. Do you have any further comments on the draft AQAP3?

Questionnaire made available online, in West Offices reception, at York Explore libraries and emailed directly to the following:

- all statutory consultees
- all local authorities within the Yorkshire region
- local health professionals (including NHS practitioners and members of the Health and Wellbeing board)
- bus operators
- taxi operators
- local 'Breathe Easy' group
- University of York and University of Leeds
- Business / other stakeholder contacts from previous LES consultation work
- consultants involved in the LEZ, anti-idling and electric bus feasibility studies
- members of the Low Emission Strategy Partnership (LESP)
- air quality journals

A1.1 Consultation Questionnaire Responses

A total of 35 questionnaire responses were received during the consultation period. A summary of the responses is provided below.

Questions 1, 2 and 3

- What is your postcode?
- Which of these statements best describes the views you have provided in this consultation response?
- What is your area of employment?

34 out of the 35 responses came from YO postcode areas (table 1). 31 people stated they were responding in their personal capacity as a York resident, 3 people answered in their professional capacity, one respondent was a non-York resident giving a personal view. Although not required to do so, some residents gave their occupations. These are shown in brackets in Table 1.

Table 1: Postcode of questionnaire respondents

Postcode area	Number of responses	View point
YO1	2	1x local authority officer 1 x bus operator / driver
YO10	4	4 x York resident opinion (1 resident stated leisure employment)
YO19	3	3 x York resident opinion
YO23	4	4x York resident opinion (1 resident stated self employed crafter)
YO26	5	1 x cycle touring club 4 x York resident opinion (1 resident stated academic employment, 1 resident stated support work employment)
YO30	5	5 x York resident opinion (2 residents stated academic employment)
YO31	5	5 x York resident opinion (1 resident stated central government employment, 1 resident stated transport)

		infrastructure employment, 1 resident stated local business employment)
Y032	3	3 x York resident opinion
Y024	2	2 x York resident opinion
YO41	1	1 x York resident opinion
S43	1	1 non-York resident opinion

Question 4

- **Do you agree or disagree that the council should be working to reduce emissions to air?**

28 of the respondents strongly agreed that the council should work to improve air quality and 6 agreed. 1 respondent neither agreed or disagreed.

Question 5

- **Do you agree or disagree that the measures in the draft AQAP3 will help reduce emissions to air in York?**

3 respondents strongly agreed, and 19 respondents agreed that the draft AQAP3 would reduce emissions to air in York. 7 respondents disagreed that the plan would reduce emissions. 6 respondents neither agreed or disagreed.

Question 6

- **Are there any measures in the draft AQAP3 that you consider should be given greater priority?**

When asked which measures within the draft AQAP3 should be prioritised a mixed response was received. There was clear support for prioritising the following aspects of the LES:

- Development of the CAZ (with some respondents wanting to see scope of CAZ increased to include other vehicles and some requesting removal of private vehicles from the CAZ)
- Development of anti-idling measures
- Developing measures to encourage the uptake of low emission vehicles and fuels

- Development of measures to reduce the impact of freight

A number of respondents stated that they wanted existing LTP3 measures, particularly in relation to walking and cycling, to take precedent over LES measures. It is already clearly acknowledged within AQAP3 that the LES based measures are in addition to the sustainable transport measures already being delivered through other CYC policies and programmes and through previous air quality action plans. Sustainable transport delivery remains a high priority for the city and the need to include this on new developments is being incorporated into the new LES planning guidance.

A number of respondents did not prioritise the measures in the draft AQAP3 but gave their own views on other measures that should be treated as priority. These views have been included in the list of other ideas arising from question 8.

Table 2 provides a more detailed breakdown of the responses to question 6 and commentary on how the suggestions have been considered in relation to the AQAP3 development processes.

Some respondents provided more than one suggestion as to which measures should be prioritised.

Question 7

- **Are there any measures in the draft AQAP3 that you have concerns about?**

The main concerns raised about the draft AQAP3 measures were:

- Lack of anti-idling signage and exclusion of anti-idling enforcement measures
- Issues surrounding creation of CAZ
- Potential for further road closures / access restrictions for cars
- Lack of inclusion of walking and cycling measures

A full list of concerns can be found in Table 3. Some respondents used this question as an opportunity to raise concerns about issues not specific to individual AQAP3 measures or to suggest additional

improvement measures. These have been included in the responses to question 8.

Question 8

- **Are there any other measures that you would like to see included in the draft AQAP3 that are currently not included?**

Question 8 provided the questionnaire respondents with an opportunity to provide their own ideas for inclusion in AQAP3. A list of these additional ideas (including those raised in response to other questions) are included in table 4 along with a response to each individual suggestion. The majority of the additional ideas related to sustainable transport and congestion reduction policies which fall within the remit of LTP3. These have been discussed with colleagues in transport planning and the responses incorporate their views on the proposed measures.

Question 9

- **Do you have any further comments on the draft AQAP3?**

The majority of the responses to this question consisted of further suggestions of measures to include in AQAP3 or repeated earlier comments. The additional measures suggestions have been included in the list in table 4.

Issues raised for the first time in response to question 9 are shown in table 5. The main concerns were:

- Level of ongoing political support for the measures
- Length of consultation period

Table 2: Measures identified for prioritisation by consultees

Comment type	Status in draft AQAP3?	Proposed action / response arising from the consultation
Prioritise anti-idling measures		
Reduce emissions from idling coaches / idling buses (particularly in Leeman Road)	The draft AQAP proposes delivery of an anti-idling marketing and communications campaign in line with the recommendations made within the York anti-idling feasibility study. The adoption and enforcement of anti-idling legislation was not included.	In response to the consultation it is recommended that the marketing and communications based approach to reducing idling measures should be prioritised for action during 2015/2016. A review of possible locations for anti-idling signage will also be undertaken to establish where this can be practically implemented. Adoption of anti-idling legislation will remain optional for the future. This is in line with current council policy to reduce enforcement burdens for businesses, and recognition of the limited staff resources available to undertake such work.
Reduce idling / provide anti-idling signage (no specific vehicle type identified)		
Enforce anti-idling		
Address impact of idling at traffic lights		

Comment type	Status in draft AQAP3?	Proposed action / response arising from the consultation
Prioritise CAZ / change CAZ proposal		
Prioritise delivery of CAZ	The draft AQAP3 suggested delivery of a CAZ for buses by 2018 through the use of a Traffic Regulation Condition (TRC) enforced by the Traffic Commissioner. The proposal is already under discussion with local bus operators and could be implemented relatively quickly using a staged approach that will give bus operators time to upgrade their fleets.	Other vehicles could be included / excluded from the CAZ through the use of a Traffic Regulation Orders. Introduction of TROs would require consultation with a large number of stakeholders and would generate significant implementation and enforcement costs for CYC (unlikely to be affordable at the present time). Emission modelling work to support the development of AQAP3 indicates that a bus based CAZ (along with other proposed AQAP3 measures) should be enough to deliver the air quality objectives at most locations in York. The extent and scope of the CAZ will be subject to further public consultation and member approval. Opportunities to extend the CAZ requirements beyond buses could be reviewed as part of the CAZ implementation process or in 2021 once the bus based CAZ is fully operational.
Include taxis in CAZ		
Remove cars from CAZ to allow easier access for buses / reduce use of private cars in city centre		

Comment type	Status in draft AQAP3?	Proposed action / response arising from the consultation
Prioritise LTP3 / Sustainable Transport Measures		
Prioritise walking and cycling over LES measures	AQAP3 is intended to set out CYC's new low emission approach to air quality improvement whilst avoiding duplication of existing policies and programmes. Walking, cycling and public transport improvements are already delivered in York through LTP3, existing sustainable development policies and the Local Sustainable Transport	The draft AQAP3 has been revised to further emphasis links to sustainable transport policies and programmes
Reduce journeys	Programme (I-travel York). It is not necessary to repeat these existing policies and programmes within AQAP3 but it should be clear that they are an important aspect of the overall approach to air quality improvement in York	New LES planning guidance has been developed that requires developers to calculate the emission impact of their proposals and demonstrate how this will be mitigated against using a variety of sustainable transport and low emission mitigation measures. A further period of public consultation is required before this document can become formal supplementary planning guidance.
Prioritise walking and cycling within planning guidance		

Comment type	Status in draft AQAP3?	Proposed action / response arising from the consultation
Prioritise use of low emission vehicles and fuels		
Reduce use of diesel vehicles / ban diesel vehicles / set a reasonable date by which all taxis and buses must be diesel free	The primary aim of AQAP3 is to encourage the uptake of low emission vehicles and fuels. The bus based CAZ will considerably reduce the number of diesel buses operating in the city centre by 2021 with the majority of 'frequent flyer' services replaced with electric buses or other ultra low emission technology. The hybrid taxi incentive scheme is working towards reducing the number of diesel taxis in the city and a further review of taxi licensing policies is planned. CYC already successfully supports bus operators to assist them in obtaining grants for low emission buses. A network of EV charging points has been established.	Many of the consultation respondents wanted to see more action on reducing diesel emissions, particularly from buses and taxis. A complete diesel ban is not proposed at the present time but the scope of the CAZ could be extended in future years to achieve this (subject to public consultation and member support). CYC will continue to work with bus operators to deliver the cleanest bus fleets economically possible. A review of taxi licensing emission standards has recently been completed and further consultation with the taxi trade on proposed new emission standards is planned prior to a report to licensing committee by April 2016. It has already been established that the introduction of a reduced licensing fee for low emission vehicles is not legally possible (as the licensing fee must only cover administrative costs which are the same for all vehicles). Currently funding for the ECO-stars scheme beyond 2015 is uncertain.
Reduce emissions from taxis, cheaper licences for low emissions taxis, hackney licenses only to be release for electric / hybrid vehicles		
Ban all non-low emission buses, have minimum emission standards for all buses (including those that fall outside proposed CAZ controls), Provide more electric buses, Provide grants to bus operators for bus upgrades		
Incentives for other fuels, EV vehicle infrastructure provision, link ECO-stars to procurement		

Comment type	Status in draft AQAP3?	Proposed action / response arising from the consultation
Prioritise freight reduction / freight transshipment measures		
Prioritise freight transshipment	The draft AQAP3 included measures to support creation of a CNG refuelling plant in the city and an associated freight transshipment centre where goods could be transferred to smaller low emission vehicles before entering the city centre. A CNG feasibility study for York has already been completed and a potential refuelling site identified.	Negotiations with potential investors to build and run a CNG refuelling centre and associated freight transshipment centre are currently ongoing. The delivery of these facilities requires a high level of commitment by CYC and other local businesses / transport operators to convert their vehicles to CNG and support the operation of the freight trans-shipment centre. Further improvements are now planned to outer ring road roundabouts which will assist further with keeping 'through' traffic out of the city centre.
Reduce amount of freight		

Comment type	Status in draft AQAP3?	Proposed action / response arising from the consultation
Prioritise LTP3 / Sustainable Transport Measures		
<p>Prioritise walking and cycling over LES measures</p>	<p>AQAP3 is intended to set out CYC's new low emission approach to air quality improvement whilst avoiding duplication of existing policies and programmes. Walking, cycling and public transport improvements are already delivered in York through LTP3, existing sustainable development policies and the Local Sustainable Transport Programme (I-travel York). It is not necessary to repeat these existing policies and programmes within AQAP3 but it should be clear that they are an important aspect of the overall approach to air quality improvement in York</p>	<p>The draft AQAP3 has been revised to further emphasis links to sustainable transport policies and programmes</p> <p>New LES planning guidance has been developed that requires developers to calculate the emission impact of their proposals and demonstrate how this will be mitigated against using a variety of sustainable transport and low emission mitigation measures. A further period of public consultation is required before this document can become formal supplementary planning guidance.</p>

Table 3: Consultee concerns about draft AQAP3 measures

Concern	Number of respondents raising this concern	Response
Effectiveness of the anti-idling measures. Particularly lack of signage and enforcement aspects	3	The proposed approach is in line with the recommendations of the anti-idling feasibility study and reflects successful schemes in other cities. In response to the consultation process, anti-idling signage is proposed in the report, where this can be practically achieved within current signage guidelines for the city. Adoption of anti-idling legislation will remain optional for the future. This is in line with current council policy to reduce enforcement burdens for businesses, and recognition of the limited staff resources available to undertake such work.
Effectiveness of the CAZ controls / potential for operators to reduce bus frequencies to avoid CAZ requirements/potential for CAZ to be extended to cars	6	The use of a TRO has already been successfully used in other cities to control the emission standards of buses within city centres e.g. Oxford CYC officers have held discussions Oxford to identify potential barriers to the approach and will consult closely with local bus operators in York to deliver a workable scheme that does not have a detrimental impact on bus service provision. Currently there is no intention to include other vehicles within the CAZ but this may need to be reviewed in the future if the AQAP3 is unsuccessful in delivering the level of emission reduction needed to meet the air quality objectives.
Impact of CAZ on bus operators	1	The CAZ will be developed in close consultation with local bus

		operators to ensure they have an opportunity to raise any issues and concerns they have about the scheme. CYC will continue to assist bus operators to access grants to upgrade their vehicles and reduce their fuel costs
Cost of marketing and communications strategy versus impact	1	The marketing and communications strategy will be funded through an external DEFRA grant fund obtained for this purpose. It will be delivered in conjunction with the CYC marketing and communications team to ensure maximum impact and the outcomes will be monitored and reported upon.
Not enough emphasis on sustainable transport	4	The low emission vehicle technology and fuels measures included in AQAP3 are intended to build upon and complement the existing sustainable transport measures included in LTP3, I-travel York programme and sustainable development policies. The new LES planning guidance note will continue to require sustainable transport measures as a minimum standard for many new developments and in many cases will require these to be enhanced with the inclusion of low emission vehicle and fuel technology measures.
To much emphasis on bus emissions, more needed to reduce impact of private cars	1	AQAP3 includes a wide range of measures to reduce tailpipe emissions from all vehicle types including buses, HGVs, taxis and cars. CYC is currently in the process of applying to become an ultra-low emission city. If successful this bid will allow more emphasis on measures to encourage the uptake of low emission cars. Measures relating to modal split for journeys, trip reduction and congestion reduction are already included within LTP3 and do not need to be duplicated within AQAP3.

Document not ward specific	1	<p>The air pollution issues in York occur within a relatively small number of wards and are all caused primarily by traffic. The mix of vehicles across these wards is similar for all areas. Preventing access or diverting vehicles from one ward to another will simply shift the problem to another ward and will not reduce the total amount of emissions in the city. AQAP3 takes an holistic approach to emission reduction that will reduce emissions across the whole city and maximise the health benefits for all residents. Where specific problems are reported to the council with respect to unnecessary idling emissions or pollution from sources other than traffic these will can be dealt with on a case by case basis.</p>
----------------------------	---	---

Table 4: List of additional LES ideas proposed by consultees with potential for inclusion in AQAP3

Suggestion	Response
Use smaller buses on P&R at non-peak times	CYC will be re-tendering towards the end of 2015 for a new P&R contract commencing early 2017. Specification of the vehicle type/size will be part of this tendering process. The current P&R contract specifies the passenger capacity per hour required by the council, it is currently down to the operator to determine how this capacity is met. Smaller, fully electric, buses already operate on the Poppleton Bar and Monks Cross Park & Ride services.
Provide a timescale for extending CAZ to all vehicles and AQMAs	Other vehicles could be included / excluded from the CAZ through the use of a Traffic Regulation Orders. Introduction of TROs would require consultation with a large number of stakeholders and would generate significant implementation and enforcement costs for CYC (unlikely to be affordable at the present time). Emission modelling work to support the development of AQAP3 indicates that a bus based CAZ (along with other proposed AQAP3 measures) should be enough to deliver the air quality objectives at most locations in York. The extent and scope of the CAZ will be subject to further public consultation and member approval. Opportunities to extend the CAZ requirements beyond buses could be reviewed as part of the CAZ implementation process or in 2021 once the bus based CAZ is fully operational.
Prioritise LES measures over capital road programme	Prioritisation of individual policies and programmes is subject to the council decision making process which is influenced by many different factors. Air quality improvement is just one consideration

	and on some occasions it may not be able to take priority over other issues such as road safety.
Improve marketing and communication of emission reduction messages	AQAP3 already includes plans for a marketing and communication strategy relating to health and emission reduction
Reduce numbers of HGVs and buses (Clifton, Bootham and St Peters specifically mentioned)	AQAP3 includes measures to reduce emissions from buses across the whole city centre and to transfer movement of some goods onto lower emission vehicles through the creation of a freight transshipment centre.
Monitor emissions from Harewood Whin landfill site and water treatment works	Emissions from the Harewood Whin landfill site and water treatment works are regulated by the Environment Agency not CYC
Make businesses contribute towards improved road infrastructure	The new LES planning guidance requires developers to take a greater account of the additional emissions arising from their proposals and damage costs arising from this. Where possible they will be required to mitigate emissions using on-site sustainable transport and low emission vehicle measures and in some cases may be required to make a financial contribution towards wider low emission measures in the city
Greater promotion of sustainable transport health benefits	The I-travel York programme already promotes the health benefits of walking and cycling.
Make bus companies more responsible for their emissions and require them to re-invest in cleaner buses	The CAZ , new Park & Ride standards and anti-idling measures will help to address this issue

Address emissions from large sightseeing boats	The feasibility and cost effectiveness of doing this requires further investigation.
Provide information to householders on how to reduce all their emissions	This will form part of the LES marketing and communications package
Provide a free electric bus service to encourage modal shift	The feasibility and cost effectiveness of providing such a service requires further investigation.

The following transport policy and infrastructure measures were also suggested during the consultation period and have been referred to transport colleagues for further consideration:

- Introduce city centre traffic restrictions to reduce vehicle numbers
- Introduce congestion charging
- Clarify emission impact of 20mph zones
- Improve traffic light sequencing / manage traffic flow better
- Introduce box junctions at all major road junctions
- Remove traffic pinch points
- Address mis-use of cycle lanes by parked
- Prevent / reduce workplace parking
- Improve road infrastructure

- Remove all on street parking
- Remove cycle lanes from pavements
- Introduce box junctions at all major road junctions
- More provision of off-road / green cycle ways
- Remove all traffic calming measures
- Limit stops for P&R buses where other services are available
- Ensure city centre parking charges are significantly higher than P&R fares and remove all free parking in city centre car parks

Table 5: Other concerns and issues

Concern	Response
Lack of political support / commitment to the AQAP3 measures and impact of this on future delivery of the measures	Once approved the measures in AQAP3 will be adopted council policy. Progress on delivering AQAP measures has to be reported annually to DEFRA. Under the provisions of the Localism Act DEFRA has the ability to pass on EU fines to local authorities who do not deliver sufficient measures to improve air quality.
Consultation period was too short	A standard CYC 6 week on-line public consultation was undertaken on AQAP3 as detailed in the main report
Document will be ineffective	The modelling undertaken to support the development of AQAP3 indicates that it has the potential to significantly reduce emissions in the city and deliver the air quality objectives at all but one of the technical breach areas by 2021. This modelling is based on the draft Local Plan as it stood at the end of 2014 ¹

¹ Traffic growth due to development is currently expected to offset some of the emission benefit that would otherwise arise from national emission technology improvements, but a net reduction in NO_x emissions is still expected at most locations. Housing targets within the draft Local Plan are under review and the resultant growth in traffic may not be as great as that predicted using the 2014 projections. Depending on the final housing targets, and the location and timing of new developments, it may be possible to meet the AQ objectives in all the technical breach areas by 2021. Revised modelling of the AQAP3 outputs will be undertaken once the Local Plan targets and allocations have been finalised.

Document only provides modelled data

The draft AQAP3 gave a full update on actual monitored air pollution concentrations to the end of 2013. The final version of AQAP3 provides air quality data for 2014 as well. Predictions of future air quality and the impact of the AQAP3 measures can only be achieved using models.