

## AQAP4 Consultation – Summary of Responses

A total of 173 responses to the survey were received from 148 York Residents (94%), 5 non-York residents (3%), and 5 people (3%) responding in a professional / business capacity (including 1 taxi driver/operator, 1 academic institution/university and 2 environmental charities/pressure groups). A separate written response to the consultation was received from York Civic Trust (YCT) and is discussed later in this Annex.

### Concern about air quality

Before reading the draft Air Quality Action Plan, the level of concern from respondents about air quality in York was as follows: 50.4% very concerned, 24.0% moderately concerned, 8.8% slightly concerned and 16.8% were not concerned about air quality in York.

After reading the draft Air Quality Action Plan, the level of concern from respondents about air quality in York was as follows: 48.4% very concerned, 27.1% moderately concerned, 6.6% slightly concerned and 18.0% were not concerned about air quality in York.



The level of concern about air quality was broadly similar before and after reading AQAP4, suggesting a good baseline understanding of existing air quality issues amongst respondents.

Over three quarters (79.4%) of respondents either agreed or strongly agreed that the council should continue to reduce air pollution, with 14.3% disagreeing or strongly disagreeing and 6.4% being ambivalent.

### Priority areas

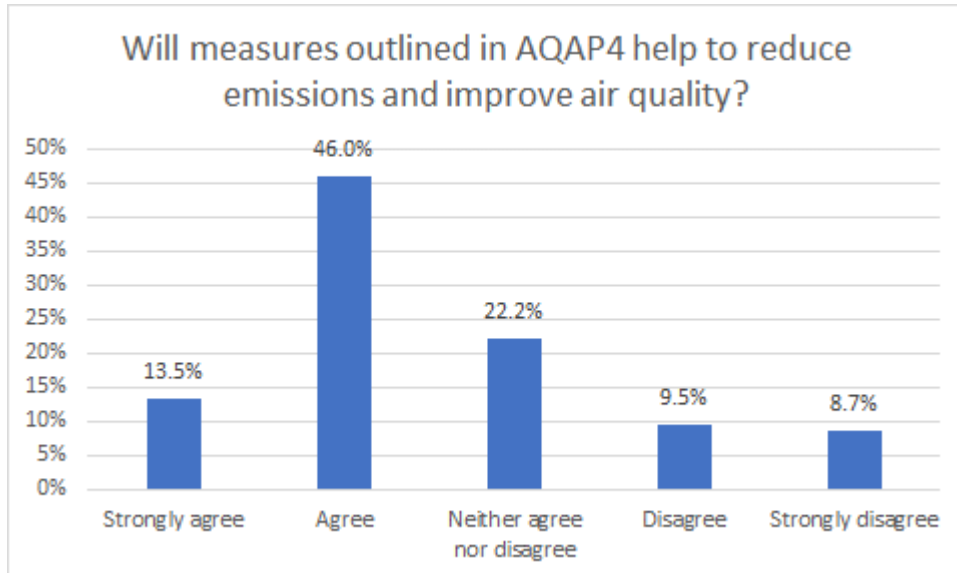
The draft Air Quality Action Plan sets out CYC's priority areas to reduce emissions and to further improve air quality in York over the next 5 years. Respondents were asked to indicate their level of support for each of these areas. Between 66.9% and 87.3% of respondents indicated support/strong support for all AQAP4 priority areas.

**Most supported areas** - The top 5 areas (either supported or strongly supported) were reducing emissions from buses (87.3%), monitoring air quality / access to air quality information (84.9%), reducing emissions from freight/delivery vehicles (83.3%), reducing emissions from taxis (83.2%), and reducing emissions from council vehicles (81.7%).

Area	Support / Strongly Support	Against / Strongly Against	Neutral
Reducing emissions from buses	87.3%	7.1%	5.6%
Monitoring air quality / access to air quality information	84.9%	5.6%	9.5%
Reducing emissions from freight/delivery vehicles	83.3%	8.7%	7.9%
Reducing emissions from taxis	83.2%	6.4%	10.4%
Reducing emissions from council vehicles (CYC Fleet)	81.7%	7.9%	10.3%
Minimising development related emissions	81.7%	9.5%	8.7%
Reducing emissions from idling vehicles	81.6%	11.2%	7.2%
Reducing non-transport related emissions (industry / non-domestic combustion)	80.0%	10.4%	9.6%
Modal shift, active travel and network improvement (e.g. reducing car dependency, reducing congestion and promoting walking, cycling and public transport)	77.6%	16.8%	5.6%
Improved public information and awareness	76.2%	8.2%	15.6%
Reducing non-transport related emissions (domestic combustion)	68.3%	23.0%	8.7%
Expand Electric Vehicle (EV) Charging	68.3%	12.7%	19.1%
Incentives for low emissions vehicles/ Alternative fuels	66.9%	16.9%	16.1%

Between 5.6% and 23.0% of respondents indicated they were against / strongly against some AQAP4 priority areas. The 5 areas receiving the least support (either against or strongly against) were measures to tackle domestic combustion / burning of solid fuels at home (23.0%), incentives for low emission vehicles (16.9%), modal shift / active travel / network improvement (16.8%), expand EV charging (12.7%) and reducing emissions from idling vehicles (11.2%). However, it should be noted that these responses very much reflected the minority, with over two thirds of other respondents supporting or strongly supporting all these areas as shown in the table above.

Participants were asked if they thought that measures outlined in AQAP4 would help to reduce emissions and improve air quality in York. The majority (59.5%) of respondents agreed or strongly agreed that they would. Less than a fifth of respondents (18.3%) did not agree that the measures would help to improve air quality, with 22.2% being unsure.



### Should measures be given greater priority in the short-term

Respondents were asked if they considered any measures in the draft plan should be given greater priority in the short term (<2 years).

Less than half of participants (44%) chose to respond to this question, which was a free text response. The vast majority of respondents did not refer to specific AQAP4 measures, but made comments around specific themes / areas which are summarised below (ordered most mentioned to least mentioned). Note that some respondents referred to more than one theme.

Theme / Area	Number (% in brackets) of respondents referencing theme in response
Modal shift, active travel and network improvement (includes reducing car dependency / congestion and promoting walking, cycling and public transport measures)	31 (34.4%)
Smoke Control Areas / solid fuel burning (e.g. wood burning stoves)	14 (15.6%)
Measures to reduce emissions from delivery vehicles / HGVs	9 (10.0%)
Measures to reduce emissions from buses (including electrification)	8 (8.9%)
Tackling idling vehicles	8 (8.9%)

Theme / Area	Number (% in brackets) of respondents referencing theme in response
Measures to reduce emissions from taxis	5 (5.6%)
Development related emissions / constraints on further development in York	5 (5.6%)
Raising public awareness of air pollution	5 (5.6%)
Reducing emissions from CYC Fleet Vehicles	2 (2.2%)
Further EV Charging facilities (especially on-street charging)	2 (2.2%)
Monitoring of air quality / access to information	1 (1.1%)

- Around a third of responses (34.4%) referred to general measures to promote modal shift, active travel and network improvement. These included measures to reduce car dependency, reduce congestion and promote walking, cycling and public transport use. This priority area encompasses interventions anticipated to be delivered mainly through the Local Transport Planning (LTP) process. Measures in CYC's LTP will continue to be an intrinsic part of the overall approach to air quality improvement and transport-based emission reduction across the city.
- 14 respondents (15.6%) were keen to prioritise measures to tackle domestic solid fuel burning. This included AQAP4 measures around enforcement of smoke control areas and further restrictions on the types of fuels that can be burnt.
- 9 respondents (10%) thought measures to reduce emissions from delivery vehicles / HGVs should be prioritised. This included reference to the AQAP4 measure around a local freight hub / consolidation centre.

Some comments raised under this question, related to ideas that were perceived not to already be covered specifically in AQAP4. These are summarised below.

Theme / Issue Raised	CYC response
<b>Delivery management</b> - Consideration of vehicles used for takeaway deliveries	CYC has few powers to control smaller vehicles used for food deliveries such as Uber Eats / Deliveroo / Just Eat etc assuming vehicles are roadworthy, but is committed to reducing vehicle idling or illegal parking on the public highway. Reducing emissions from vehicles used for larger scale food deliveries will be considered as part of AQAP4 measures

Theme / Issue Raised	CYC response
	to tackle freight / delivery movements (AQAP4 measure 1a)
<p><b>Road user charging / congestion charging</b> - Charging cars to enter within city walls</p>	<p>Congestion charging is not an option currently being considered by CYC and has been ruled out over the term of the current administration. See <a href="#">item 22 of Council - Thursday, 20 July 2023</a>.</p>
<p><b>Local policy on fireworks</b> – Ban domestic use of fireworks</p>	<p>You can light fireworks between 7.00am and 11.00pm on any day of the year. Outside of these times lighting fireworks is illegal, although there are exceptions for certain festivals. The Police enforce these laws and by breaking them you may face a fine or imprisonment. The understanding is that Government has taken the general view that the sale of fireworks to ordinary domestic customers is better controlled and licensed. The general view is that the licensing regime permits and regulates the market and that if fireworks were banned, there may be a possibility that individuals might use more dangerous alternatives (e.g. garden chemicals). CYC strongly encourages attendance at professionally organised fireworks displays, but considers that most individuals have a sensible and responsible attitude to their use and therefore a domestic ban is currently not being considered.</p>
<p><b>20mph speed limits</b> – introduce further limits across other areas</p>	<p>A reduction in traffic speed limit within the existing AQMA, which already experiences slow moving traffic and congested conditions, is unlikely to result in further measurable air quality improvements. However, it is acknowledged that a reduction in traffic speed limit will have positive road safety implications and this will be considered on a case by case basis, as part of CYC's Local Transport Strategy, in the wider context of CYC's road safety schemes (such as those around schools).</p>

## Other measures

Respondents were asked if there were any other measures that they would like to see included in the draft plan that were (in the respondent's view) currently not included. Recommendations of measures are summarised below, along with CYC's response to each point.

Theme / Issue Raised	CYC response
<p><b>School admission policy</b> - School places must be allocated to nearest proximity to home address (to minimise travel)</p>	<p>Allocation of school places covered by <a href="#">CYC school admission policies</a> and takes into account location / catchments. CYC's iTravel team encourage active travel, such as walking or cycling, and other ways to do the school run. AQAP4 measure 10a includes continued work with schools to promote sustainable travel choices, minimise idling events, deliver cycling training, school travel planning and to facilitate events to promote Walk to School week / Clean Air Day.</p>
<p><b>Energy efficiency grants</b> - Homeowner energy efficiency grants available to <u>all</u> York residents, irrespective of income</p>	<p>AQAP4 recognises the synergies with CYC's carbon reduction programmes and measures to improve energy efficiency and support services. This is already considered as part of AQAP4, see measure 11c. CYC will actively seek opportunities for grants to support such activities. Further information about current opportunities is available on <a href="#">CYC's website</a>.</p>
<p><b>Vehicle idling</b> - Roadside signage to request drivers of vehicles to switch off engines when stationary (such as when waiting at lights).</p>	<p>AQAP4 already includes specific measures to tackling vehicle idling (see measures 3a and 3b) and is committed to installing further signage where practical and safe to do so. Whilst CYC cannot take formal enforcement action against drivers who idle their vehicles whilst sitting in traffic, we will consider opportunities for advisory anti-idling signage in areas of air quality concern, requesting drivers switch off their vehicle engines whilst waiting at traffic lights, for example. AQAP4 section 5.2.3 has been updated to reflect this.</p>
<p><b>Road user charging / ULEZ</b> - Implement a ULEZ or road charging policy (possibly with differential peak &amp; off-peak charges) for the inner ring road.</p>	<p>AQAP4 is committed to looking at options for expanding the current Clean Air Zone (CAZ) for buses to other areas and to other vehicle types (including</p>

Theme / Issue Raised	CYC response
	<p>HGVs/delivery vehicles and taxis). See AQAP4 measures 1c, 2c and 4c Opportunities for zero emission and ultra-low emission city centre freight deliveries will be explored under AQAP4 measures 1a, 1b and 1c. Congestion charging is not an option currently being considered by CYC and has been ruled out over the term of the current administration. See <u>item 22 of Council - Thursday, 20 July 2023</u>.</p>
<p><b>Planning policy / guidance</b> - Banning new developments which increase car journeys</p>	<p>CYC is committed to exploring sustainable travel options for new developments and reducing private vehicle use as far as practicable. CYC Low Emission Planning Guidance is due to be updated within the timeframe of AQAP4 (see measure 7a)</p>
<p><b>Promotion of low emission plant</b> - Non-Road Mobile Machinery (NRMM) / stronger control of highway rental equipment utilising diesel engines</p>	<p>AQAP4 measure 7a references emissions from NRMM and consideration of local standards as part of updates to local planning guidance.</p>
<p><b>Bonfires / garden waste disposal</b> - Burning of wet garden or allotment waste / further controls around bonfires</p>	<p>CYC strongly encourage alternatives to bonfires for disposing of all waste, such as composting recycling or taking waste to a Household Waste Recycling Centre (HWRC). There are no byelaws prohibiting bonfires in York, but CYC can take action on individuals having bonfires that cause a nuisance (Environmental Protection Act 1990). CYC will continue to raise awareness of pollution impacts of bonfires and to promote alternatives.</p>

Theme / Issue Raised	CYC response
<p><b>Planning policy / guidance</b> - Review of planning and heritage policies to also incorporate re-development and refurbishment projects which require planning approval and heritage consent. Facilitating a move away from fossil fuel heating sources is often made more complex or impossible by the constraints on listed buildings and a lack of willingness to work with people on making changes to their current building stock.</p>	<p>AQAP4 measure 7a states that CYC's aim is to ensure that heating technologies in new developments, achieve the lowest emissions possible, considering both local air quality and carbon reduction targets. This will be facilitated via local planning policy and guidance, which are subject to ongoing review and periodic update.</p>
<p><b>Transboundary pollution</b> - Consideration of transboundary air pollution</p>	<p>Transboundary air pollution is a particular problem for pollutants that are not easily destroyed or react in the atmosphere to form secondary pollutants. These are cross boundary pollutants that can be generated in one country and felt in others; these require international actions and collaboration to control their formation and effects. CYC is committed to working with partners / other local authorities to tackle air pollution and ensure efficient resource use and pollution abatement. CYC will continue to work with regional and central government on policies and issues beyond CYC's direct influence.</p>
<p><b>Public transport</b> - Reintroduce trams</p>	<p>Not a measure that can be delivered within the 5-year period of AQAP4 but comment fed back to lead for Local Transport Strategy (LTS) consultation.</p>
<p><b>Public transport</b> - Inter-operator bus ticketing</p>	<p>Measures to improve bus services addressed through delivery of schemes and initiatives in line with Bus Service Improvement Plan (BSIP) – see AQAP4 measure 10b. Comment fed back to lead for Local Transport Strategy (LTS) consultation.</p>



Theme / Issue Raised	CYC response
<p><b>Domestic burning / smoke control</b> - Increase penalties for contravention of incorrect fuel burning by residents</p>	<p>AQAP4 commits to a revised enforcement approach for smoke control contraventions (including a local penalty definition, subject to member decision) in line with amendments made to the Clean Air Act 1993 (see measure 11b). CYC will continue to investigate sales of non-authorised fuels and complaints of non-compliance.</p>
<p><b>Nature based solutions</b> - Creation of bio-diverse mini woodlands / planting of trees / nature solutions</p>	<p>CYC has a dedicated '<a href="#">Green Streets</a>' project team working to increase the tree canopy cover across York. The council has set a target to increase York's tree canopy to 13% by 2050 and is working with schools and communities to deliver this. This work is being facilitated by CYC's Carbon Reduction Team rather than through AQAP4. We are also promoting <a href="#">Tremendous York</a> along with community volunteer groups, businesses and organisations. Also see <a href="#">York Community Woodland</a> project. AQAP4 section 5.2.7 has now been updated to include a reference to the use of green infrastructure (planting of trees and shrubs) for mitigating emissions to prioritise protection for more vulnerable people.</p>
<p><b>EV Only Access</b> - Electric vehicles (EVs) only within the city walls by 2030</p>	<p>See earlier comments in relation to 'Road user charging and ULEZ'. CYC is committed to promoting the use of low and zero emission vehicles (including electric and other technologies such as hydrogen).</p>
<p><b>Congestion reduction</b> - Change of road layout to ensure it is easier to leave York than to get into York, to reduce congestion</p>	<p>Schemes such as the York Outer Ring Road (YORR) scheme aims to improve York's highway network to reduce congestion, facilitate the movement of car journeys out of the city centre and enhance the pedestrian and cycle experience with improvements to active travel provision along the network. LTP infrastructure schemes are considered under AQAP4 measure 10c.</p>

Theme / Issue Raised	CYC response
<p><b>Planning policy / guidance</b> - Ban on gyratories in populated areas like Nunnery Lane/Princes Lane</p>	<p>Any new development incorporating a transport gyratory close to residential dwellings would be required to consider exposure issues as part of a comprehensive air quality / exposure assessment. Permission would only be granted for such schemes where air quality / exposure issues are demonstrated to be acceptable. CYC's existing Low Emission Planning Guidance covers these issues. Other issues such as noise would also be a consideration.</p>
<p><b>Emissions monitoring</b> - Live measurements of vehicle emissions using cameras/sensors combined with ANPR</p>	<p>CYC has previously worked closely with local academic institutions to undertake roadside monitoring of vehicle emissions to inform local air quality policy. Opportunities for further work of this nature are currently being looked at for areas like Gillygate.</p>
<p><b>Vehicle idling</b> - Real-time air quality messaging to promote engine switch offs.</p>	<p>CYC's Variable Message Signs (VMS) are currently routinely used for this purpose in some areas of the city.</p>
<p><b>Domestic burning / smoke control</b> - Ban installation of new wood burning stoves</p>	<p>In the government's <a href="#">Environmental Improvement Plan</a> (2023) it clearly states: <i>"We are not considering a ban on domestic burning in England. The UK government recognises that some households are reliant on solid fuel burning as a primary source for heating, hot water and cooking"</i>. CYC is committed to reviewing/expanding the current smoke control area boundaries and revising the enforcement approach for smoke control contraventions (including a local penalty definition) in line with amendments made to the Clean Air Act 1993 (see measure 11b). CYC will continue to investigate sales of non-authorized fuels and complaints of non-compliance. CYC's <a href="#">'Fuel for Thought'</a> campaign aims to highlight the healthier and more cost-effective ways of heating homes, and, if unavoidable, the safest and most efficient ways of using a wood burner.</p>

Theme / Issue Raised	CYC response
<p><b>Highways works management</b> - Ensure temporary traffic lights for roadworks are not installed days before works begin.</p>	<p>The use of temporary traffic lights is subject to a strict CYC application and approval process as outlined on the <a href="#">CYC website</a>. As CYC operates a permit scheme, all applications must abide by the New Roads and Street Works Act, including advance notice timescales, in order to be granted.</p>
<p><b>EV Charging</b> - Make provision for on-street EV charging</p>	<p>AQAP4 commits to delivering an updated 'Public EV Charging Strategy' by 2025 (see measure 6), to ensure we continue to provide a robust and fit for purpose future EV charging network across York. Opportunities for on-street charging will be revisited as part of this review.</p>
<p><b>Low Emission Taxi Grants</b> - Amend the Low Emission Taxi Grant Scheme so that only pure electric vehicles (EVs) are included</p>	<p>Latest <a href="#">Low Emission Taxi Grant</a> scheme criteria are set based on criteria agreed with DEFRA (who provided funding for the scheme). All grant funding for the current scheme has now been allocated. Scheme criteria will be fully reviewed for further rounds of the scheme, should further grant funds become available. Opportunities for CYC to support taxi drivers to upgrade vehicles to ULEVs is covered under AQAP measure 4b.</p>
<p><b>Low Traffic Neighbourhoods</b> - Reopen Low Traffic Neighbourhoods (assumed to be Groves scheme)</p>	<p>Subject to consultation and CYC member approval. Outside scope of AQAP4.</p>
<p><b>Cycle routes</b> - Making cycling safer (segregated and off-road lanes and improved cycle security). Better cycle path routes to villages.</p>	<p>CYC is developing a Local Cycle and Walking Infrastructure Plan (LCWIP) which will designate strategic networks within York for cycling (and walking) and will identify and prioritise infrastructure schemes to deliver such networks. See AQAP4 measures 10a and 10c.</p>
<p><b>Public transport</b> - Have real bus time displays at all bus stops</p>	<p>Measures to improve bus services addressed through delivery of schemes and initiatives in line with Bus Service Improvement Plan (BSIP) – see AQAP4 measure 10b. Comment fed back to lead for Local Transport Strategy (LTS) consultation.</p>

Theme / Issue Raised	CYC response
<p><b>Low carbon heating</b> - Promote the shift to low carbon heating systems / boiler upgrades etc</p>	<p>AQAP4 measure 7a states that CYC's aim is to ensure that heating technologies in new developments, achieve the lowest emissions possible, considering both local air quality and carbon reduction targets. This will be facilitated via local planning policy, guidance and local grant funding.</p>
<p><b>Further pedestrianisation</b> - including suggestion to make Coppergate part of the main pedestrian zone</p>	<p>In principle, CYC support the reallocation of road space to remove polluting vehicles and to increase safety for pedestrians, in line with modal priorities. This topic is a matter for our Local Transport Strategy (LTS) and the comment has been fed back to lead for LTS consultation.</p>
<p><b>CYC to impose certain requirements on tenants through tenancy agreements</b> – for example, don't allow burning of garden waste, don't allow more than one diesel vehicle per property / limit the number of vehicles per property</p>	<p>CYC strongly encourage alternatives to bonfires for disposing of all waste, such as composting recycling or taking waste to a Household Waste Recycling Centre (HWRC). There are no byelaws prohibiting bonfires in York, but CYC can take action on individuals having bonfires that cause a nuisance (Environmental Protection Act 1990). CYC will continue to raise awareness of pollution impacts of bonfires and to promote alternatives in line with AQAP4 measure 9a: Improving public access to air quality information and advice. Restrictions on number of vehicles not considered viable as subject to operational demands of individual household.</p>
<p><b>Install power points in city centre for mobile traders to use</b></p>	<p>Whilst much of Parliament Street and St Sampson's Square already has these facilities, CYC is currently exploring provision of electric hook-up points for mobile traders in other key locations (in the context of reducing the need for diesel generators which contribute to city centre air pollution and noise).</p>

Theme / Issue Raised	CYC response
<b>NRM road train and city cruise boats to be electrified.</b>	CYC are committed to working with external partners to facilitate electrification of fleets and will seek to signpost and support relevant funding opportunities for this.
<b>Make Ouse Bridge bus only</b>	Comment fed back to lead for Local Transport Strategy (LTS) consultation to be considered as part of city-wide 'Movement and Place' plan
<b>Route optimisation and traffic light phasing for key areas</b>	AQAP4 Priority Area 10 commits to implementing measures to reduce vehicle congestion, which will have significant positive benefits for local air quality. Exploration of specific traffic management options for areas like Gillygate to reduce emissions and improve air quality are already covered in AQAP4. CYC is currently developing options for a trial on Gillygate involving phasing of traffic lights (anticipated to be progressed in 2024).
<b>Parking</b> - increasing parking charges for drivers who use larger, heavier and more polluting vehicles / charge for on-street parking everywhere	CYC will periodically review the local definition of 'low emission vehicle' in the context of national policy and local parking discounts to ensure that any incentives remain appropriate and deliver continuous improvement. AQAP4 commits to reviewing parking fees, including the need for a parking surcharge for some vehicles based on their emissions.
<b>Freight consolidation</b> - consideration of York station as freight consolidation centre location (and use of trains for transporting freight)	AQAP4 measure 1a commits to exploring opportunities / options for reducing freight emissions. CYC is reviewing the recommendations of a feasibility study undertaken to address first/last mile delivery of light goods in York, including consideration of opportunities for rail-based solutions.

Theme / Issue Raised	CYC response
<b>Workplace Parking Levy</b>	CYC recognise that a workplace parking levy would have a direct economic impact on employers / people employed in York. This is not currently an option being considered by CYC's present administration
<b>Car free areas</b>	Comment fed back to lead for Local Transport Strategy (LTS) consultation to be considered as part of city-wide 'Movement and Place' plan
<b>CYC Fleet</b> - Encourage use of cycles/cargo cycles as replacement for <3.5t CYC vehicles (cars / vans)	CYC employees are encouraged to use pool bikes for staff travel where appropriate, dependent on the demands of the service area. There is also a cargo bike which can be used to transport light goods around the city. Whilst cycles and cargo bikes are not considered practical for many CYC service areas (due to operational responses times and load carrying ability), this will be reviewed as vehicles are replaced in the future, to ensure the lowest emission (fit for purpose) mode is chosen.
<b>WHO Guidelines</b> - strive to meet WHO limit of 10µg/m <sup>3</sup> for NO <sub>2</sub> as a health-based target, rather than UK legal limit of 40µg/m <sup>3</sup>	Through delivery of AQAP4 and our complementary strategies CYC will take action to reduce air pollution beyond statutory National Air Quality Objectives and work towards World Health Organisation (WHO) Guidelines in the longer term. However, under the Local Air Quality Management framework, there is no requirement to set targets in the context of WHO Guidelines, indeed the government's view is that it would not be possible to meet these across the UK as they are set with no consideration given to achievability.

Theme / Issue Raised	CYC response
<p><b>Taxi Licencing</b> – should not approve Plug-In Hybrid Electric (PHEV) for taxi electrification, focus should be on pure Battery Electric Vehicles (BEV)</p>	<p>AQAP4 commits to further consultation with the taxi trade regarding revisions to CYC’s Taxi Licensing policy and conditions about the type and age of vehicle that will be licensed by CYC in the future. Conditions will reflect CYC aspirations for an ultra-low emission taxi fleet and strive to achieve continual emission reduction from licensed vehicles (both hackney carriage and private hire vehicles). Existing AQAP4 measures 4a,4b and 4c aim to reduce emissions from taxis. CYC’s priority is to reduce the number of Internal Combustion Engine (ICE) taxis (petrol/diesel) operating in York.</p>
<p><b>Sustainable Design</b> - A greater focus on local planning and sustainable locations to reduce the need to travel</p>	<p>AQAP4 commits to strengthening local planning guidance to further reflect synergies between air quality improvement and other policies / strategies. Development of wider Sustainable Transport Supplementary Planning Document subject to Local Plan and examination process. See AQAP4 measure 7a.</p>
<p><b>Other emissions</b> - Consideration of construction emissions and ventilation outlets from junk food outlets (in terms of particulate matter emissions)</p>	<p>CYC will continue to ensure that emissions and air quality impacts from new developments are appropriately assessed and mitigated (including during construction). Construction emissions are controlled via the requirement for Construction Environmental Management Plans (CEMPs) on development sites.</p> <p>CYC currently review all commercial extraction systems that come in through the planning process and are committed to ensuring business operations are using best available technologies (BAT) in terms of emissions and odour abatement.</p>
<p><b>Gas boilers</b> – consider raising awareness of emissions from gas boilers to support the climate objectives of wider use of heat pumps.</p>	<p>AQAP4 recognises the synergies with CYC’s carbon reduction programmes and measures to improve energy efficiency and support services. This is already considered as part of AQAP4,</p>

Theme / Issue Raised	CYC response
	see measure 11c. The decarbonisation of heating (and transport) is a theme that runs throughout AQAP4 and associated carbon reduction policies.

### Support for future action to improve air quality

Respondents were asked which measures they currently do, or may do in the future, to improve air quality in York. A summary of the responses is provided in the table below.

Action to improve air quality	Currently do	Propose to do	Do not propose to do
Shop Locally/ Order Online	79.5%	6.6%	13.9%
Walk more	78.9%	6.5%	14.6%
Use my car less	72.9%	5.1%	22.0%
Switch off vehicle engine when stationary to prevent idling emissions	64.9%	7.9%	27.2%
Cycle more	52.5%	9.3%	38.1%
Use the Bus	49.6%	16.2%	34.2%
Consider modifying my daily behaviour to reduce polluting activities (e.g driving less, walking more, avoid solid fuel burning) where air pollution in York is forecast to be 'high' on a specific day and CYC alerts me to this.	45.7%	25.9%	28.5%
Reduce use of open fire / solid fuel burning stove	44.9%	10.3%	44.9%
Consider home / business energy efficiency upgrades (e.g. insulation) to reduce carbon and other emissions	39.7%	37.2%	23.1%
Share a lift	26.6%	14.2%	59.3%
Review air quality information available from CYC to help reduce my exposure to poor air quality	23.3%	45.7%	31.0%
Use a lower emissions vehicle/electric vehicle	21.9%	36.0%	42.1%
Replace gas boiler with lower carbon / lower emission technologies (e.g. heat pumps)	9.8%	27.9%	62.3%
Attend community events in York (or online webinars) about energy efficiency / building retrofit solutions	8.3%	41.7%	50.0%
Buy an e-Bike/try an E-Scooter	5.2%	11.2%	83.6%
Join a car club/ Car share scheme	1.8%	11.6%	86.6%



## Current actions

Respondents indicated that the key things they currently do to improve air quality are shop locally / online (79.5%), walk (78.9%), use their car less (72.9%), switch off their vehicle engine when stationary (64.9%) and cycle (52.5%). A number of respondents cited lack of safe, continuous, segregated cycle routes (and conflict with pedestrian routes) as a barrier to cycling more. Around half of people (49.6%) already used the bus service.

Almost half (45.7%) of respondents said that they already modify their daily behaviour to reduce polluting activities (e.g. driving less, walking more, avoid solid fuel burning) where air pollution in York is forecast to be 'high' on a specific day. As CYC currently doesn't have a *forecasting* service, it was assumed that this information was obtained from Air Quality England (publishing actual monitored concentrations of pollution in York).

Over a third of people (39.7%) had considered home / business energy efficiency upgrades but only 9.8% of people had replaced their gas boiler with lower carbon / lower emission technologies. The key barrier cited for this were cost and lack of local information and expertise (mainly in relation to heat pump technology but also home insulation). Some cited constraints in relation to what they can do in their rental property (or stated this was the landlord's responsibility) and others had recently replaced their gas boiler like for like. Just under half of people (44.9%) had already considered reducing their use of an open fire or solid fuel burning stove to improve air quality.

Around a quarter (26.6%) of respondents shared lifts with the aim of improving local air quality, a similar proportion to those who already reviewed air quality information available from CYC to help reduce their exposure to air pollution (23.3%).

Less than a quarter of respondents used an electric vehicle (21.9%), had attended community events focussed on energy efficiency (8.3%), owned a e-bike / trialled an e-scooter (5.2%) or were members of a car club / car share scheme (1.8%).

## Future actions

The top 4 activities respondents indicated that they propose to do in the future to improve air quality are review air quality information available from CYC (45.7%), attend community events about energy efficiency / building retrofits (41.7%), consider energy efficiency upgrades (37.2%) and use a lower emission / electric vehicle (36.0%).

In addition to the 45.7% of respondents who said that they *already* modify their daily behaviour to reduce polluting activities when air pollution is high in York, an additional quarter of all respondents (25.9%) said that they propose to do this in this future.

People were least likely to join a car club/car share scheme (86.6% do not propose to do this), buy an e-bike / try an e-scooter (83.6% do not propose to do this), replace their gas boiler with a lower emission technology (62.3% do not propose to

do this) or share a lift (59.3% do not propose to do this). One person commented that the car club standing charge made the service unappealing.

Around 45% of people said that they do not propose to reduce the use of their open fire or solid fuel burning stove to improve local air quality. Over a third of people said that they were unlikely to cycle more (38.1% do not propose to do this) or use the bus service (34.2%).

### Other comments

Other specific comments received on the draft AQAP4, not covered elsewhere in this summary, are outlined below.

Due to the number of comments received, those not specifically related to AQAP4's development and/or comments that cover issues already included in AQAP4 are not included in the table below. Similarly, comments raised in relation to specific named developments in York will be considered on a case-by-case basis, in line with current CYC planning policy and guidance.

Theme / Issue Raised	CYC response
<p><b>Data availability</b> - CYC should publish information on EV charger use and trends in the number using different transport modes.</p>	<p>Number of EV charging episodes is collected by CYC and is published in CYC's Annual Air Quality Status Reports available on <a href="#">City of York Council's website</a>. Available statistics relating to buses, walking and cycling are available on <a href="#">York Open Data</a></p>
<p><b>Real-time information</b> - On street real-time displays showing current air pollution level, for example at every signalised pedestrian crossing, with a colour coded Air Quality Index displayed</p>	<p>Levels of air pollution are highly specific to the area of the city and as such having real-time displays at every pedestrian crossing would be prohibitively expensive. It should also be noted that the day-to-day concentrations of pollution observed in York are not currently in excess of health-based standards (areas of air quality concern are due to long-term sustained levels of pollution in some locations). The daily 'Air Quality Index' for most areas of York is often 'Low' and members of the public would therefore not observe much change on a daily basis. AQAP4 (measure 9b) commits to developing an Air Quality Alert / Notification Service that will result in improved knowledge and awareness of air pollution and links to health impacts. CYC will also explore wider behaviour change messaging in response to high pollution episodes, which may include</p>

Theme / Issue Raised	CYC response
	press releases / social media and/or signage.
<b>Publicity / awareness raising</b> - Do more to publicise some of the health impacts of air pollution	Through AQAP4, CYC is committed to providing information to the public about the health impacts of air pollution and how behaviour change can reduce emission and exposure (for example, see measures 9a, 9b and 9c).
<b>Carbon reduction</b> - Prioritise decarbonisation of transport and heating	This is already a theme running throughout AQAP4 and associated carbon reduction policies.
<b>Vehicle idling</b> - Enforce fines for idling vehicles	AQAP4 measure 3b includes reviewing CYC's approach to anti-idling enforcement. CYC can already enforce idling offences on the public highway.
<b>Concerns around promotion of EVs</b> - EV vehicles emit polluting particles from tyre wear etc. They are not the solution.	AQAP4 acknowledges that EVs still emit fine particulate pollution caused by brake and tyre wear and that they are not the only solution to improve air quality. Measures to reduce private vehicle trips and encourage walking, cycling and use of public transport are considered fundamental to AQAP4. CYC's Local Transport Plan (LTP) continues to be a key part of the overall approach to air quality improvement across the city, with active travel at the apex of the city's travel hierarchy. See AQAP4 measures 10a, 10b and 10c
<b>Car free days to promote active travel</b> - Implement car free days within the city to give drivers the opportunity to walk / cycle / use public transport / breathe cleaner air.	Comment fed back to lead for Local Transport Strategy (LTS) consultation This would require consideration of a multitude of issues, including highways implications, required exemptions and economic impacts and would be subject to CYC elected member approval.

Theme / Issue Raised	CYC response
<p><b>Emissions from trains</b> - The train station is horrendous for air pollution but for some reason does not have to meet air quality targets.</p>	<p>Whilst CYC is not obliged to monitor air quality in the station itself close to platforms, we are aware that DfT commissioned some national work to install monitors at various stations (including York) to help to understand the current unknown situation and to potentially develop plans to improve air quality in station areas.</p>
<p><b>On-street EV charging</b> - Why is CYC not accessing funding residential on-street charge points like other cities?</p>	<p>See previous comments above in relation to on-street EV charging and proposal to deliver an updated 'Public EV Charging Strategy' by 2025 (see measure 6). On-street charging will be revisited as part of this review.</p>
<p><b>Concerns over reversal of blue badge ban</b> - Reversal of Blue Badge city centre ban conflicts with the objective to reduce emissions in central York.</p>	<p>Issue subject to discussion with relevant CYC elected members and outside the scope of AQAP4 measures.</p>
<p><b>Taxis</b> - Ensure that only York registered taxis work in the city</p>	<p>The <a href="#">Deregulation Act 2015</a> allows bookings to be subcontracted out of district and legislation currently allows for cross border hiring. This measure can therefore currently not be taken forward. CYC's priority is to find ways to encourage taxi drivers to drive electric and hybrid taxis rather than Euro VI diesel and petrol.</p>
<p><b>Traffic Management</b> - Objection to traffic management options for areas like Gillygate due to lack of alternative routes (or routes that take vehicles down other congested and resident-dominated streets). Considered that measures should focus on improving the junction at Bootham/Gillygate e.g. by removing the filter phases from the traffic light cycle, and adding bus-priority lanes southbound on Clarence Street and north-bound on St Leonards Place in place of the existing left-turn lanes at the respective junctions.</p>	<p>CYC recognise that specific traffic management options for areas like Gillygate will be needed to reduce emissions and improve air quality. All such options are subject to further feasibility work and trials. The implications for other areas of York's road network will be fully investigated using appropriate monitoring and modelling techniques as part of holistic approach.</p>

Theme / Issue Raised	CYC response
<p><b>Promotion of EVs</b> - Increased weight of EVs causes production of PM</p>	<p>It is recognised that the increased weight (due to batteries) of some electric vehicles (EVs) can result in increased non-exhaust PM production from brakes and tyres for these vehicles. CYC recognise that promotion of EVs can offer considerable savings in terms of tailpipe emissions (NOx and PM), but that wider sustainable travel measures are needed to tackle non-exhaust PM fractions and facilitate modal shift to other modes such as cycling and walking. This ties in with CYC's Local Transport Strategy objective to reduce private vehicle mileage and promote modal shift and active travel.</p>
<p><b>Cycling</b> - Encourage 'cycle to school' campaigns and make the roads safe for children and the elderly. Offer vouchers to purchase second hand bikes.</p>	<p>School travel planning is dealt with under the AQAP4 priority area on modal shift, active travel and network improvement. CYC's iTravel team regularly host / attend events to promote sustainable travel in schools. They also offer journey advice at community/employment sites.</p>

## Other responses (not via Questionnaire)

### York Civic Trust Response (received 29<sup>th</sup> Jan 2024)

Comment	Response
<p>AQAP4 is now drafted to cover the five-year period from 2023 - 2027, but that the first year of this period has already passed, leaving four years in which to implement the proposed actions</p>	<p>The final AQAP4 will cover the period 2024 – 2028 and the document and measures will be dated accordingly</p>
<p><b>Understanding emissions and concentrations</b> - Recommend that CYC adopts an air quality modelling system, using the known linkages between sources, emissions and concentrations. This would enable the Council to quantify the impacts of different interventions, for all three pollutants of concern.</p>	<p>AQAP4's approach for considering emissions and concentrations meets the requirements of national LAQM guidance. Calculations presented in the document do take account of the non-linear relationship between NO<sub>x</sub> and NO<sub>2</sub> (a concern raised). Whilst CYC does not currently have capacity to operate and maintain a dedicated air quality model in-house (this would require additional staff and resources), we are committed to utilising dispersion modelling approaches for project work aimed at improving air quality in specific areas (e.g. Gillygate). CYC has previously worked with local universities and will continue to draw upon expertise of external bodies throughout AQAP4's delivery.</p>
<p><b>Source apportionment</b> - Recommend that the Plan bases its assessment of source apportionment in York on the national inventory, to make clear the extent to which sources of pollution in York lie outside the city boundaries. Also recommended that further source apportionment is undertaken for local concentrations of NO<sub>2</sub> and PM<sub>2.5</sub>. Also suggests that the document should recognise that that reductions in air pollutant emissions in York have a wider national and international benefit (consideration of transboundary air pollution, for example).</p>	<p>Additional NO<sub>2</sub> source apportionment (<i>in line with national guidance LAQM-TG22</i>) has been undertaken for all key areas of the AQMA, including all areas where annual mean concentrations of NO<sub>2</sub> above 40µg/m<sup>3</sup> were recorded in 2022. This is now presented at the end of AQAP4 section 3.3.1.</p> <p>National guidance note LAQM-TG22 recognises that source apportionment of PM<sub>2.5</sub> concentrations at the same resolution is routinely not possible due to the coarse nature of national PM<sub>2.5</sub> modelling and lack of local data to inform such studies. However, CYC is committed to taking action to address PM<sub>2.5</sub> from primary and secondary sources, which represent around a 50:50 split of the UK total. Primary PM<sub>2.5</sub></p>

Comment	Response
	<p>sources comprise man-made emissions from combustion (industrial processes, domestic heating and road traffic exhausts) and non-combustion processes (e.g. fugitive emissions from agricultural / industrial material handling; non-exhaust emissions from vehicles - tyre and brake wear, and road abrasion). Secondary PM<sub>2.5</sub> is formed by natural and transboundary sources; CYC is committed to working with partners / other local authorities to tackle air pollution and ensure efficient resource use and pollution abatement.</p> <p>Additional text has been added to the Introduction section of AQAP4 to state that reductions in air pollutant emissions in York will also have wider national and international benefit.</p>
<p><b>UK objective thresholds and WHO Guidelines</b> - The Plan at present only uses the UK objective thresholds to determine the need for action. We recommend that the Council sets itself a target of meeting WHO Air Quality Guidelines by 2039 and uses this aim to set more demanding targets for maximum concentration levels to be achieved by 2027. Suggests document needs to set targets for PM<sub>2.5</sub> reduction.</p>	<p>Through delivery of AQAP4 and our complementary strategies CYC will take action to reduce air pollution beyond statutory National Air Quality Objectives and <u>work towards</u> World Health Organisation (WHO) Guidelines in the longer term. However, under the Local Air Quality Management framework, there is no requirement to set targets in the context of WHO Guidelines, indeed the government's view is that it would not be possible to meet these across the UK as they are set with no consideration given to achievability.</p> <p>DEFRA state that local authorities should take action to reduce emissions and the precursors of PM<sub>2.5</sub>, with action to tackle PM<sub>10</sub>/NO<sub>x</sub> contributing to this. It should be noted that many of the measures in AQAP4 to address NO<sub>x</sub>/PM<sub>10</sub> will also have co-benefits for PM<sub>2.5</sub>. CYC's current approach to reducing emissions / concentrations of PM<sub>2.5</sub> (and indeed reducing exposure to such emissions) is summarised in section 2.3 of our latest <u>Annual Status Report</u> and through delivery of AQAP4 CYC will seek all further opportunities to work towards</p>

Comment	Response
	<p>reducing levels of PM<sub>2.5</sub> from sources within our control. DEFRA are obliged to review action by local authorities in this respect and have committed to placing further obligations on local authorities, if needed.</p> <p>AQAP4 has been updated in line with some of the recommendations made by the YCT. Specifically, the WHO guideline has been added to figure 2.2 as suggested, to show that maximum concentrations of NO<sub>2</sub> remain in excess of the WHO air quality guidelines for all locations of the AQMA.</p>
<p><b>Specification of concentration targets</b> - recommend that targets are set for PM<sub>10</sub> and PM<sub>2.5</sub> and that the proposed average for NO<sub>2</sub> over the three sites where concentration targets are exceeded is rejected (Indicator 3) in favour of applying the same target to all three sites. We also suggest that thought be given to setting targets for the city as a whole as well as for specific sites.</p>	<p>Comments in relation to setting of PM targets are discussed under the comment above.</p> <p>Indicator 3 was developed in response to a request by CYC's current administration to have a single figure indicator in the Council Plan to track air quality across CYC's current areas of air quality technical breach. AQAP4 section 3.7 highlights CYC must maintain a continued minimum 2.5% annual reduction in Indicator 3 with a target to achieve a figure of less than 40 µg/m<sup>3</sup> before 2026. This target is considered challenging but realistic. Within the 5-year lifetime of AQAP4, it is expected that Indicator 3 (and all technical breach areas respectively) will be below 40 µg/m<sup>3</sup> and within health-based standards. It is stressed in the document (and indeed in legislation) that the 40 µg/m<sup>3</sup> target also applies to all areas individually. It should be noted that Annual Mean concentrations NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> at discrete sites across York will be reported annually as part of CYC's Annual Status Report to DEFRA. It should also be noted that Indicator 2 will present the maximum NO<sub>2</sub> concentrations recorded in all areas of the AQMA to allow progress in individual areas to be observed. This will ensure full transparency in monitored values (and will ensure that improvements in one area cannot be used to mask lack of improvement in another areas).</p>



Comment	Response
	<p>YCT suggest there is inconsistency between the 10% reduction over 4 years (2.5% per year for Indicator 3) in that it falls below the 16% reduction in NO<sub>2</sub> needed in areas such as Gillygate to meet health-based standards (with corresponding reductions in NO<sub>x</sub> of 25%). CYC recognise that more than 10% reduction is needed in some areas of the city and for this reason AQAP4 outlines measures that are anticipated to deliver emission reduction levels to go beyond health-based standards in all areas. The emission modelling work presented in section 3.5 of the document illustrates reductions in road traffic NO<sub>x</sub> emissions of approximately 26% could be achieved through a combination of measures and associated outcomes delivered through AQAP4 (and associated local strategies / policies).</p>
<p><b>Calculation of transport emission targets</b> - Clarity is needed as to whether the target 25% reduction in NO<sub>x</sub> emissions from transport is simply for the three sites where concentration targets are exceeded or, as the wording implies, for the city as a whole.</p>	<p>The target 25% reduction in NO<sub>x</sub> emissions from transport is required to meet health-based air quality objectives across the Air Quality Management Area. Local authorities are required to calculate this figure in their AQAPs, in line with DEFRA guidance. This is based on worst-case monitoring in three technical breach areas over the last 5 years (to cover pre and post pandemic periods). This value does <u>not</u> apply to all roads within CYC's administrative area, as monitoring for most areas of the network has shown that these areas are already within health-based standards. However, it is recognised that greater reductions in emissions would be needed across the city to meet WHO Guidelines.</p>
<p><b>Implications for transport interventions</b> - suggest that the proposed changes in different transport metrics are incompatible with those specified in the climate strategy. YCT propose alternative set of outcomes / targets.</p>	<p>The exact emission impact of AQAP4 is difficult to quantify precisely as there are many factors which may influence future emission levels in the city; this is discussed further in AQAP4 section 3.5. The work presented in AQAP4 section 3.5 and table 3.6 shows that reductions in road traffic NO<sub>x</sub></p>

Comment	Response
	<p>emissions of approximately 26% could be achieved through a combination of measures and associated outcomes delivered through AQAP4 (and associated local strategies / policies). The package of transport measures shown at the end of table 3.6 reflects a possible way of meeting the 25% reduction in NO<sub>x</sub> emissions needed. Table 3.6 also provides some sensitivity testing to demonstrate emissions impacts associated with different scenarios. These are not targets per se, but one combination of outcomes that would achieve the target reduction in NO<sub>x</sub> emissions. As YCT correctly point out, other alternative combinations of outcomes could equally be substituted here to achieve the 25% reduction in NO<sub>x</sub> emissions needed. Indeed, the document states that if reductions in car usage of 20% (in line with CYC's 2030 Transport Strategy target) were achieved alongside the other scenarios, reductions in road traffic NO<sub>x</sub> emissions would increase from 26% to 35%.</p> <p>YCT expressed concerns over the 25% reduction in freight traffic in table 3.6. It should be noted that this figure would not need to be achieved across CYC's entire network, but only in specific air quality 'hotspots'. CYC recognise that this figure will need to be reviewed following evaluation of projects such as the freight transshipment centre pilot. It should be noted that the longer-term reductions in freight traffic achievable will be highly dependent upon funding and resources to support delivery of future measures, such as permanent freight consolidation facilities. The location and scale of such facilities will also be a key consideration.</p> <p>CYC has a statutory duty to deliver air quality improvement as quickly as possible and AQAP4 must take all measures reasonably practical to deliver cleaner air and achieve further reductions in vehicle miles travelled in York. It should also be</p>

Comment	Response
	<p>recognised that NO<sub>x</sub> emission reduction across York can also be influenced, albeit to a lesser extent, by measures to tackle non-transport related emissions such as those associated with commercial and domestic heat and power provision.</p>
<p><b>Development of exposure reduction targets</b> - recommend that consideration is given to developing exposure reduction targets on the basis that continuous reduction in concentrations and specifically in air pollution exposure would result in an improved health outcome overall.</p>	<p>CYC strongly support YCT's comment that continuous reduction in concentrations (and in air pollution exposure) would result in an improved health outcomes. AQAP4's opening paragraph states that CYC is committed to further improve air quality in York to go beyond health-based National Air Quality Objectives in all areas and to work towards meeting stricter WHO guidelines. It is acknowledged that the implementation of an exposure reduction target approach would require the use of a comprehensive city-wide air quality model. CYC do not currently have the staff or resources to operate and maintain such a model. As such, this approach will be considered for future iterations of the AQAP, subject to resources.</p>
<p><b>Green infrastructure</b> – AQAP4 does not mention green infrastructure</p>	<p>CYC has a dedicated '<a href="#">Green Streets</a>' project team working to increase the tree canopy cover across York. The council has set a target to increase York's tree canopy to 13% by 2050 and is working with schools and communities to deliver this. This work is being facilitated by CYC's Carbon Reduction Team rather than through AQAP4. We are also promoting <a href="#">Tremendous York</a> along with community volunteer groups, businesses and organisations. Also see <a href="#">York Community Woodland</a> project. AQAP4 section 5.2.7 has now been updated to include a reference to the use of green infrastructure (planting of trees and shrubs) for mitigating emissions to prioritise protection to more vulnerable people.</p>

Comment	Response
<p><b>Key priorities</b> - concerned that all the key priorities proposed appear to be designed to achieve reductions in NO<sub>x</sub>, and that eight of the twelve focus on transport. We recommend that key priorities are specified to achieve targets in particulate reduction, and that key priorities are also specified separately for the domestic, industry, production, point source and agriculture sectors.</p>	<p>The focus for AQAP4 is to meet health-based standards for NO<sub>2</sub> across the city in the shortest possible timeframe, in line with the Environment Act 1995 (as amended). This is the legal basis for AQAP4. The majority of priority areas and measures are concerned with tackling transport emissions, as these are still the biggest contributor to NO<sub>x</sub> emissions and resultant NO<sub>2</sub> concentrations in the AQMA. As stated above, many of the measures in AQAP4 to address NO<sub>x</sub>/PM<sub>10</sub> will also have co-benefits for PM<sub>2.5</sub>. CYC's current approach to reducing emissions / concentrations of PM<sub>2.5</sub> (and indeed reducing exposure to such emissions) is summarised in section 2.3 of our latest <a href="#">Annual Status Report</a> and through delivery of AQAP4 CYC will seek all further opportunities to work towards reducing levels of PM<sub>2.5</sub> from sources within our control. DEFRA are obliged to review action by local authorities in this respect.</p>
<p><b>Measure evaluation</b> – suggest that evaluation method adopted is not strictly a cost-benefit analysis and recommend that that term is not used. We also recommend, for clarity, treating co-benefits as a separate criterion from that of feasibility.</p>	<p>The high-level cost-benefit approach adopted in AQAP4 is in line with DEFRA guidance. DEFRA have commented on the draft AQAP4 that <i>'Cost benefit analysis of the measures has also been developed, which aids cross comparison and public understanding of the relative impacts of each measure. Each measure has clearly been well considered as a result, with detailed analysis provided'</i>.</p> <p>As explained under section 5.1 the 'Feasibility' criteria includes consideration of co-benefits such as compatibility and synergies with wider CC policies including climate strategy and planning policies. It is considered that alignment with wider CYC policies could in fact make measures more 'feasible' due to CYC's ability to attract potential funding sources (i.e. due to joined up wider strategic ambition).</p>

Comment	Response
<p><b>KP1: Freight</b> - recommend including a ban on vehicles over 3T in the footstreets, development of cargo bike services, provision of a parcels hub at York Station and designation of a limited network to which vehicles over 7.5T are limited.</p>	<p>Recommendations to be considered as part of development of AQAP4 measures 1a, 1b and 1c and wider 'Movement and Place' plan.</p>
<p><b>KP2: Buses</b> - recommend excluding retrofitted Euro 6 diesel buses from the Bus CAZ, given the evidence that they are highly polluting, and making the tourist "hop on hop off" buses electric and subject to the CAZ.</p>	<p>CYC understands that JAQU (Joint Air Quality Unit) / bus retrofit expert group are due to report on the Euro VI retrofit issue in due course, following more detailed research into the efficacy of exhaust retrofit solutions. CYC will await the results of his research. Should retrofitted Euro VI buses be shown not to be compliant with Euro VI emission standards, the current CAZ policy will need to be reviewed. Electrification of all buses is a priority for CYC; we are currently seeking DfT funding for non-First services and tour buses.</p>
<p><b>KP3: Anti-idling</b> - recommend an analysis of how much idling contributes to emissions in the three exceedance streets and, subject to that, introducing focused signing and effective enforcement on the streets where the contribution justifies such action. YCT question the effectiveness of anti-idling campaigns in general.</p>	<p>AQAP4 measures 3a and 3b are not specifically aimed at vehicles queuing on the public highway, but more at vehicles that are parked up, waiting and idling unnecessarily and as such relate to the wider area of York, not just areas of air quality technical breach within the AQMA. CYC continue to receive complaints about unnecessary vehicle idling.</p> <p>AQAP4 commits to further anti-idling signage in key locations on the public highway (informed by future complaints) together with enforcement, where necessary. Raising awareness of idling emissions with partner organisations and schools is also an important part of the strategy.</p> <p>CYC will take a proportionate approach to tackling idling emissions, recognising that whilst they form a small contribution to overall emissions in York, they should continue to be targeted as part of a comprehensive Air Quality Action Plan. It should be noted that tackling unnecessary</p>

Comment	Response
	<p>idling emissions also has benefits in terms of reducing noise pollution and carbon emissions.</p>
<p><b>KP4: Taxis</b> - recommend including private hire vehicles within these provisions, and welcome the proposal to make them subject to the Clean Air Zone.</p>	<p>CYC has little control over non-CYC licensed taxis / private hire vehicles or indeed their right to operate within York. Note that the Deregulation Act 2015 allows bookings to be subcontracted out of district and legislation currently allows for cross border hiring. CYC's priority is to find ways to encourage taxi drivers to drive electric and hybrid vehicles rather than diesel and petrol. AQAP4 commits to considering the feasibility of extending the Clean Air Zone to include taxis, which is a mechanism to place stricter controls over out of area vehicles.</p>
<p><b>KP6: EV Charging Network</b> - recommend a critical review to ensure that the level of EV charging provision is sufficient to satisfy the needs of the population of EV vehicles anticipated in the climate change strategy. As part of this, we recommend providing on-street charging to meet the needs of the 25% of homes without off-street parking.</p>	<p>AQAP4 commits to delivering an updated 'Public EV Charging Strategy' by 2025 (see measure 6), to ensure we continue to provide a robust and fit for purpose future EV charging network across York. Opportunities for on-street charging will be revisited as part of this review.</p>
<p><b>KP7: New developments</b> - recommend that the proposed Low Emission Supplementary Planning Document is replaced by one covering all aspects of Sustainable Transport, and that the Council dedicates staffing resources to ensuring that the requirements of that SPD are effectively enforced.</p>	<p>AQAP4 commits to strengthening local planning guidance to further reflect synergies between air quality improvement and other policies / strategies. Development of Sustainable Transport Supplementary Planning Document subject to Local Plan and examination process.</p>

Comment	Response
<p><b>KP8: Incentives</b> - recommend limiting this key policy to those measures not also covered by KPs 6, 9 and 10. We also recommend that any rebates on parking charges are not applied to the Council's off-street car parks.</p>	<p>CYC recognise that there is a degree of duplication between this priority area and other AQAP4 priority areas, such as EV charging and modal change.</p> <p>AQAP4 measure 8 states that CYC will explore incentives and opportunities to encourage the wider uptake of low and zero emission vehicles. CYC recognise that the travel planning process (personalised / workplace and school) can be used as a means of encouraging the acquisition of low emission vehicles. AQAP4 commitments under 5.2.8 have been updated to reflect this and now also include the commitment to <i>'Promote and encourage the acquisition of low emission vehicles via travel planning services (and incentives for their use)'</i></p> <p>The scope of any local parking discount is subject to review, to include consideration of revenue implications. CYC must ensure that incentives remain appropriate and deliver continuous improvement.</p>
<p><b>KP9: Awareness</b> - recommend limiting this key policy to measures involving travel plans, and extending it to include personalised travel plans.</p>	<p>This area relates specifically to delivering clear messages to the public around the cause and consequence of poor air quality, particularly around impacts on health. School and business travel planning is dealt with under the priority on modal shift, active travel and network improvement.</p>

Comment	Response
<p><b>KP10: Modal shift, active travel and network improvement</b> - consider this key policy to be a confusing mix of disparate types of intervention, and recommend that it focus solely on active travel. We recommend caution in referring to funding from the Emergency Active Travel Fund, most of which remains unspent. Recommend deleting the text related to the dualling of the outer ring road, since evidence suggests that it will have little impact on pollution in the city centre.</p>	<p>This priority area encompasses interventions anticipated to be delivered mainly through the Local Transport Planning (LTP) process. Measures in CYC's LTP will continue to be an intrinsic part of the overall approach to air quality improvement and transport-based emission reduction across the city. For completeness and to avoid unnecessary duplication, only the major LTP based schemes that support air quality action planning in York have been referenced in AQAP4.</p> <p>Information in AQAP4 regarding the impact of the Outer Ring Road scheme has been taken from the air quality assessment submitted for the scheme (A1237 from A19 Shipton Road to A1036 Little Hopgrove roundabout). The assessment showed that the scheme has the potential to result in a reduction in traffic flows through some areas of the city centre AQMA. This may provide CYC with opportunities in the future for further measures to manage traffic, encourage safe active travel and increase the use of public transport.</p>
<p><b>Industrial and domestic emissions</b> - recommend focusing this key policy on domestic buildings, addressing the need to deal with gas boilers and biomass fires, and ensuring that the policy on the former is compatible with that in the climate change strategy. The strategy needs to consider what to do about wood fired heating in houses and how to influence private owners to change.</p>	<p>AQAP4 recognises the synergies with CYC's carbon reduction programmes and measures to improve energy efficiency and support services. This is already considered as part of AQAP4, see measure 11c. The decarbonisation of heating (and transport) is a theme that runs throughout AQAP4 and associated carbon reduction policies.</p> <p>YCT's comments around tackling wood fired heating in houses is dealt with under AQAP4 measures 9c, 11b and 11c.</p>



Comment	Response
<p><b>Monitoring and access to information</b> - YCT welcome this as a key priority, but suggest that the material on access to information be included in KP9, which already deals with public information and awareness.</p>	<p>This priority area around 'monitoring and access to information' relates specifically to air quality monitoring <i>data</i>. Monitoring air quality across York allows CYC to assess compliance with Air Quality Objectives, evaluate the effectiveness of air quality improvement interventions and to provide information to York's residents, visitors and workers to help them reduce exposure. Measures 12a and 12b have been included in AQAP4 to cover these issues.</p> <p>KP9 on the other hand relates specifically to delivering clear messages to the public around the cause and consequence of poor air quality, particularly around impacts on health and as such is seen as a distinct area relating more to awareness raising type activities.</p>