

Annex C

Individual written responses to AQAP3 consultation

This Annex provides a summary of the individual written responses received during the AQAP3 consultation period.

A total of 10 individual written responses were received and are summarised in Table 1.

A summary of the additional suggestions arising from the written consultation submissions are given in Table 2.

Table 1: Summary of written responses to AQAP3 consultation

Respondent	Focus of comments / concerns	Action taken
CYC arboricultural officer	No mention of green infrastructure within the document and the benefits this can have for local air quality	The impact of green infrastructure on air quality is now included within AQAP3
Chair of York Environment Forum	No mention of green infrastructure within the document and the benefits this can have for local air quality	The impact of green infrastructure on air quality is now included within AQAP3
Cambridge City Council	Stated the document was ' <i>a good piece of work, concise and factual</i> '	None required
Air Quality Bulletin Magazine	Stated that the document was ' <i>very interesting and ambitious</i> '	None required
York Green Party	Expressed support for the CAZ and public awareness raising measures but stated they did not go far enough, particularly in relation to the scope of the CAZ and the lack of anti-idling enforcement measures. Requested a number of additional measures (see table 2).	See table 2
Regional Manager of the Confederation of Passenger Transport UK (East Midlands and Yorkshire)	Raised a number of concerns relating to the impact of the CAZ on bus operators. Considered there was too much emphasis on buses and	Consultee to be involved in further discussions around CAZ development.

	not enough on other vehicles. Voiced support for the principle of CNG but wanted more information. Supported voluntary membership of ECO-stars	
Member of the public	A detailed response suggesting a number of additional measures (mainly relating to cycling).	See table 2
Member of the public	A very detailed response suggesting a number of alternative traffic management solutions for the city	These detailed alternative traffic management and major infrastructure proposals have been considered previously by the Transport Strategy team. They do not contain any further proposals to promote the uptake and use of low emission vehicles and fuels so have not been included in the revised AQAP3.
CYC Development Officer (Transport Strategy)	A number of minor changes suggested	These changes have been incorporated into AQAP3 where possible

Table 2: List of additional ideas proposed by consultees submitting written responses

Suggestion	Response
<p>Have an i-Tree canopy survey / green infrastructure audit carried out for the city</p>	<p>i-Tree canopy surveys allow the pollution removal capacity of existing trees to be fully assessed and monetised in terms of DEFRA health damage cost savings. In Torbay for example the contribution local trees make to air pollution removal and carbon sequestration alone has been estimated to be worth £6.4m a year. The draft AQAP3 has been amended to include information on the contribution trees can make to improving local air quality and the undertaking of an i-tree canopy survey / green infrastructure audit within the city centre and Fulford AQMAs is recommended.</p>
<p>Have a clear timetable for introducing other vehicles such as tour buses, taxis and HGVs into the CAZ requirements.</p>	<p>Under the draft AQAP3 CAZ proposals tour buses would be required to meet the same standards as other buses entering the zone (determined by the frequency of entry into the zone). 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</p>

	could be reviewed as part of the CAZ implementation process or in 2021 once the bus based CAZ is fully operational.
Have a policy to require all school travel service transport contractors and major suppliers of council goods and services to join ECO-stars and develop their own low emission strategies.	AQAP3 includes measures to further develop ECO stars and link this to procurement of good and services by CYC. Currently there is no long term funding identified for the ECO-stars scheme so this level of development, whilst desirable is not currently achievable. Further funding for ECO-stars is currently being sort through the ultra low emission city bid.
Set a timetable for transition to a 100% low emission taxi fleet within the CAZ	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
Anti-idling policy should be strengthened to incorporate signage and enforcement aspects	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 will be provided 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.
The LES planning guidance should include sustainable transport measures	New LES planning guidance is being 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

	<p>further period of public consultation is required before this document can become formal supplementary planning guidance. Provision of a sustainable transport travel plan will be considered the minimum requirement for most developments under this approach.</p>
<p>Freight transshipment should be shown to be deliverable within the local plan and mechanisms put in place to ensure relevant developments make use of such a facility</p>	<p>A potential site for a freight transshipment centre has been identified within the draft Local Plan. Use of such a facility could form part of an emission mitigation strategy for a development site as required via the new LES planning guidance.</p>
<p>Introduce 'train' taxis at the railway station</p>	<p>This concept allows people wanting to travel to similar areas of the city to share a taxi by the creation of taxi ranks that serve particular locations or districts. This reduces the total number of taxi trips needed and reduces the cost for users. It has been used successfully in the Netherlands. The idea has been shared with colleagues in the Directorate of City and Environmental Services for further consideration as part of the station redevelopment programme. The idea would require extensive consultation with the station, taxi trade and CYC taxi licensing.</p>
<p>Permit pedi-cabs to operate in the city</p>	<p>There are already 10 pedi-cabs operating in the city but only two are currently operational.</p>
<p>Cycling should be encouraged for a greater range of journeys by:</p> <ul style="list-style-type: none"> Widening bike paths and remove chicanes at entrances to allow better use of bike trailers or 	<p>Measures to improve and encourage cycling will be expected to be included in the emission mitigation plans required from developers under the new LES planning guidance. This could include facilities such as cycle / trailer hire, cycle repair racks etc</p>

bikes designed to transport luggage

- Subsidising or offering hire of cycles designed to carry loads. Could include an incentive for supermarkets, DIY stores etc to offer such a service
- Publicise green travel initiatives (such as cycle hire schemes etc)
- Encourage distribution from the freight transshipment centre by a variety of alternatively fuelled vehicles
- Install bike repair racks in key public places to assist cyclists with breakdowns
- Reducing car access to city centre and improving cycle access. Those unable to cycle could be chauffeured using companion bikes, wheel chair platform bikes etc
- Prevent obstruction of cycle lanes by other users should be addressed (specific reference made to St Leonard's Place)
- not asking cyclists to 'dismount' at roadworks
- Upgrading of CYC vehicles to cleaner vehicles should include incorporation of safety features

as suggested.

As plans for a freight transshipment centre move forward the range of alternatively fuelled vehicles suitable for servicing it will be fully reviewed.

Sustainable travel opportunities are already widely advertised and promoted through the I-travel York programme and events such as the Cycling festival. The draft AQAP3 includes plans to extend promotional work to include information on the use of low emission vehicles and fuels.

Issues relating to cycle access, cycle infrastructure and cycling polices are more appropriately dealt with through the Local Transport Plan and associated Cycling Strategy and have been referred to the relevant CYC staff.

Comments relating to the opportunity to improve the safety features of the council fleet have been passed to the fleet manager.

<p>such as lorries with side guards to protect other road users</p>	
<p>Remove the NRM road train as it causes congestion and idling</p>	<p>Further evidence to support this statement would be needed prior to any discussion with the NRM. The road train plays an important role in connecting the NRM to the rest of the city centre.</p>
<p>Council should extend the 20mph zone to improve traffic flow, reduce emissions and improve safety</p>	<p>No further extension of the 20mph zones is currently planned.</p>
<p>Once a month pollution levels should be displayed at key locations in the city to highlight the issue</p>	<p>AQAP3 includes plans for a new marketing and communication strategy to raise awareness about air pollution and health issues. Improving public access to air quality data will form part of this strategy. Council officers are working in partnership with the University of York to test a new monitoring network. Part of this project will consider how air quality information can be better disseminated to the general public.</p>