Written/ Email				

Member of Public working with South Wootton Council

South Wootton Parish Council

South Norfolk and Broadland Council

Comment

Summary of comments raised:

Wanted to highlight that the AQAP priorities as proposed that focus on active travel / modal shift, followed by improvements to public transport system, align to national (DfT) hierarchy.

Raised a general concern that the switch to electric vehicles whilst reducing air pollution, will not completely solve the problem e.g. increased brake and tyre wear emissions.

Specific comments made in terms of priority measures as follows;

Priority 1 Active Travel Measures; raised concern that the active travel / mode shift measures will need to be evidence based. Also concerned with pollution levels that children are exposed to when walking / cycling to school.

Priority 2 Public Transport Measures; BSIP (M 2.1) should ensure buses link to key employment destinations. Regarding reduced NOx emissions (M 2.2) from buses, the numbers of buses declined following a review by NCC in 2018. M2.2 may be anti-competive and contrary to state air regulations.

Priority 3 Transport Schemes; Concerned about the extent of modal shift secured through the major transport elsewhere. infrastructure schemes as planned. Welcomed the inclusion of a Car Parking Strategy (M 3.3) but thought that c) Priority-3; re: modal shift from major transport schemes - this is a matter for the transport schemes. Parking current parking charges encourage peak time congestion. Would welcome a review into the charges.

Priority 4 Planning; Suggests that priority-4 measure is arguably the most welcome priority measure. Advocates planning policy that reduces number of car park spaces below NCC guidelines.

Priority 5 Public Awareness / Behaviour Change; Public awareness campaign work should be of less priority than the measures that aim to reduce traffic and secure public transport improvements.

Priority 6 WN AQ-Health based Project; The measure lacks detail to comment on.

Requests the following additional projects to be included; (a) For a review of bus services including a service to (b) Train Station in vicinity of Hardwick; Hunstanton and beyond; and, (b) to examine feasibility of a new train station in the vicinity of Hardwick.

Concerns raised in general with the extent of traffic generated from 5 major developments around the South Wootton area that is in addition to HGVs on main haul route into the docks (Grimston Rd - Edward Benefer Way). Suggests that the traffic generated could be mitigated through an improved bus service. The Parish Council fully supports / endorses response from member of public that they have been working with.

Concerned over the measures that target the area with highest NO2 concentrations. Would welcome more discussion and insight into combatting pollution at this location.

Response

It is noted that AQAP priorities align to national priorities.

Issues around brake and tyre wear emissions relate to PM not NO2 which is the focus of the AQAP. PM to form part of wider review under Measure 6.1.

Regarding comments on;

a) Priority-1; In relation to AQAP measures to be evidence based, this is noted; measures will need to be specific / delivered. In terms of pollution levels that children are exposed to when travelling to school, around the Gaywood schools, pollution levels have improved from previous years. It has been compliant for a number of years (more than 5-years).

b) Priority-2; Concern regarding buses to link to employment desitinations - the BSIP aims to make buses a more attractive option through a number of measures. In terms of M 2.2 that the source apportionment study is not representative of the decline in buses since, it is accepted that if the number of buses has declined this would affect road-NOx, but it is dependent on relative proportions and age of fleets. The relative proportions were correct in 2017, and considered adequate to inform this AQAP measure aimed at reducing any disproportionate affect. Some operators are running much older buses than those deployed in some other areas. In terms of M 2.2 being anticompetitive, we do not agree as DfT offer funding for reduced emission buses that has been successfully bid for

charges included in M 3.3.

- d) Priority-4; re: to reduce parking spaces in new developments this is a local planning policy matter.
- e) Priority-5; Agreed with comments.
- f) Priority-6; Measure lacks detail as it is still being developed.

Additional items;

- (a) Review of bus service routes:

In terms of mitigation of traffic generated from developments coming forward, the major schemes will be required to implement sustainable travel plans. Bus service improvements form part of the AQAP through M 2.1 and 2.2. We have reviewed the principal pollution sources in the worst affected area and is the reason for M 2.2 (to reduce NOx contribution from buses). Buses pull out of bus station only a short distance away from the worst affected area.