# Draft Air Quality Strategy Consultation

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# Background

Portsmouth City Council are in the process of updating and releasing a new Air Quality Strategy. As required a draft of the strategy went out to public consultation to allow feedback from residents and other relevant parties.

### Methodology

The draft strategy document was published online, as well as being available in hard copy format too.

The consultation ran from Monday 27<sup>th</sup> March - Monday 8<sup>th</sup> May 2017. The strategy document was available online, as well as a consultation questionnaire. Posters and advertising about the consultation was included in local libraries and in council e-newsletters.

In addition, researchers raised awareness in face-to-face meetings with residents during routine community engagement work in Commercial Road.

Finally, members of the TEBS team also attended local residents meetings to talk about the draft Air Quality Strategy Consultation and encourage residents to complete the questionnaire.

The following events were attended:

- Old Portsmouth and Gunwharf Quays Neighbourhood Forum
- The Transport Liaison Group meeting
- Green Drinks (local community group interested in environmental issues)

# Feedback

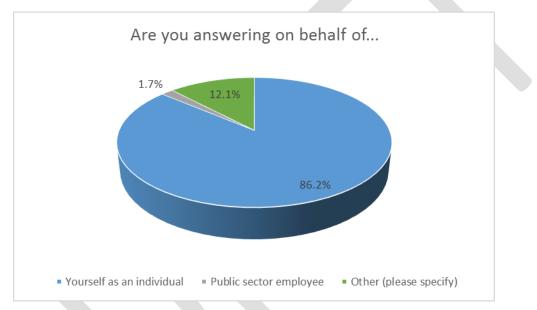
In total 58 questionnaires were completed and predominantly were from individual residents.

As well as the online questionnaire, it was also possible to submit feedback and free form comments directly to Portsmouth City Council. PCC received a further 5 freeform responses from:

- An individual
- FOOPA
- Highways England
- Natural England
- Go South Coast

Responses can be found towards the end of this report.

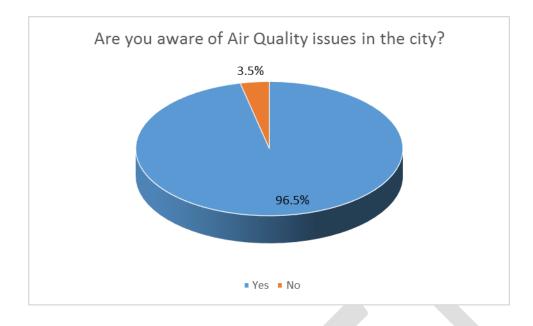
### **Questionnaire Responses**



The majority of those who responded, did so as an individual.

Of those who stated 'other' the following options were given:

- Transport Operator
- Sustrans
- MILTON NEIGHBOURHOOD FORUM
- Company providing services in the city
- Milton Neighbourhood Planning Forum
- Uber (private hire operator)
- Portsmouth Friends of the Earth



Of the 58 who responded the majority indicated that they were aware of air quality issues in the city.

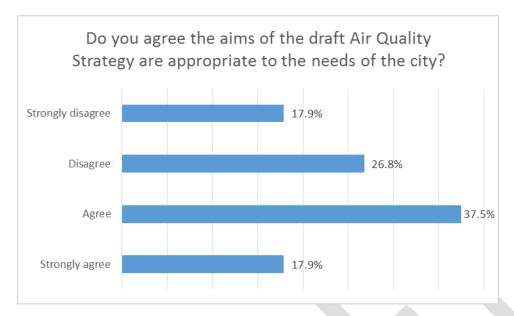
Varies indicators were given, but the experience of living in the city or with someone with a respiratory disease were mentioned, as well as those who had read reports from political parties or interest groups.

Those who were aware gave the following replies when asked how they had become aware of any issues within the city:

# **General Comments**

- 1. Council
- 2. Portsmouth Cycle Forum
- 3. Newspapers and other media reports
- 4. PCC Annual Air Quality Monitoring Reports/Strategies
- 5. Green Party Portsmouth
- 6. Consultation, local news, DEFRA maps
- 7. My children's health I have 2 young children who both suffer chronic respiratory disease exacerbated by road vehicle emissions near my house
- 8. Local research, your own material etc.
- 9. Issues for Portsmouth Friends of The Earth and evidence given at Public Enquiry[2000] for
- 10. new incinerator
- 11. living here
- 12. Media reports
- 13. my daughter's asthma is triggered on hot high pollution days
- 14. living here
- 15. Internet, local news
- 16. My own experience as a cyclist and Milton Green Personal observations; also news media, e.g.: <u>http://www.portsmouth.co.uk/news/warning-as-portsmouth-s-air-quality-nears-unsafe-levels-1-7450194</u>
- 17. The News

- 18. Green Party, Portsmouth News
- 19. DEFRA, media, client earth actions
- 20. 2006 Air Quality SPD
- 21. Friends of the Earth, PCC Documents
- 22. newspaper and journal articles
- 23. The 2006 Air Quality SPD, the VW scandal, Public Health England and my own GP.
- 24. Portsmouth FoE and this draft strategy
- 25. Media coverage
- 26. Portsmouth Friends of the Earth
- 27. Improving air quality is a strategic priority, we well connected with policy makers at the
- 28. national level and have aware from conversations at a local level of the issues
- 29. Facebook
- 30. Milton Forum
- 31. PCC & DEFRA & FOE webpages
- 32. Report, FOE, Green Party
- 33. Long term personal experience of living in the city. An awareness of environmental issues
- 34. through higher education qualifications'
- 35. Personal experience
- 36. Poor air quality, too many cars.
- 37. Portsmouth Friends of the Earth
- 38. Draft Air Qual strategy
- 39. cycling behind diesel vehicles
- 40. My experience of being in the city.
- 41. Internet
- 42. Multiple sources.
- 43. Friends of the Earth, Portsmouth AQ Strategy
- 44. PCC AQ monitoring, The News, BBC



Overall respondents agreed with the overall aims of the strategy with 55.4% agreeing or strongly agreeing that the aims are appropriate to the needs of the city.

However, some did believe that while appropriate, more could and should be done across the city and not just in those identified areas (AQMAs). Others felt that the strategy should be more 'ambitious'.

The following comments were received:

- 1. I dislike the fixation on PM2.5 pollution, as all forms of air pollution are harmful. As such, the City Council should be acting on all forms of air pollution, not just those which it is legally required to address.
- 2. We agree that air quality needs to be tackled—not only in the identified AQMAs, but across Portsmouth. The consequences for our health and environment from air pollution are avoidable. If we improve air quality, we improve quality of life for everyone.
- 3. The aims are good, but they lack detail.
- 4. They do not come anywhere near providing any real strategy and measurable outcomes.
- 5. The 3 aims are OK but need to be strengthened by adding in BY CREATING NEW AREAS FOR
- 6. AIR QUALITY MONITORING E.G. BEFORE AND AFTER MAJOR DEVELOPMENTS E.G.FORMER PRISON SITE
- 7. It talks about 'drive forward Portsmouth's Air Quality Action Plan', there are no details about what that plan is
- 8. If the aim is to work collaboratively PCC needs more authority. It cannot enforce citizens to stop using or buying diesel cars & switching to electric vehicles. It cannot reinstate the bus to serve the Hayling ferry.
- Road congestion appears to be a serious problem, with your proposed focus on "sustainable travel" being, in my view, a desirable objective.
   Sets out a practical approach
- 10. It does not go far enough
- 11. it does nothing to address the issues of match days and the city centre generally

- 12. I think it's on the right track but more needs to be done regarding cycling as a sustainable and attractive means to get around in the city.
- 13. They're a good ambition to have.
- 14. The aims are to drive forward the air quality action plan. This seems like a circular argument with no real meaning.
- 15. Unambitious
- 16. Something needs to be done to tackle the problem head on, however I don't think it's enough
- 17. We all have a duty to collectively improve the air quality we will all benefit from this
- 18. Health issues cannot be ignored
- 19. The strategy aims to 'drive forward Portsmouth's Air Quality Action Plan', but it does not provide any details on what this plan entails.
- 20. The aims only strive to work towards meeting legal limits. The draft is not robust in clearly stating commitments and delivery of improved air quality. The reality is that DEFRA has cited
- 21. Portsmouth as third worst air quality in south-east.
- 22. The aim is fine but the strategy is weak
- 23. The aims of the document are too weak, tougher strategies need to be used to address the issue.
- 24. Haven't read it, was not given a link
- 25. If the biggest offender to poor air-quality is road transport would expect the Strategy to recommend Low Emission Zones in all 5 AQMAs. I would also expect to see real differences in the promotion of sustainable transport. Most damming of all is the relegation of the priority of cyclists and pedestrians at signalised road crossings in order to keep the traffic flowing. That's encouraging car-dependency and discouraging the "active travel" you are claiming to promote!
- 26. a long-term strategy is needed
- 27. I think they should be more ambitious. The health of our citizens is vital and we should aim higher than the statutory duties.
- 28. Portsmouth need an air quality action plant
- 29. This needs both a specific and broad scope to deliver change
- 30. The problems in the are relatively minor and require small changes to effect a solution.
- 31. Health is very important. Decline in health has knock on effects such as increased strain on health services. Public transport should be increased to make it more attractive and practical for individuals to use. Increased use of public transport decreases fumes. Remove the word 'existing' before 'air quality management areas' as these could change over the 10 year period of this strategy. ALSO, the aim is to improve public health and the environment, to help make Portsmouth a healthier and more sustainable and prosperous city by ...etc. . . .
- 32. Because without a clear set of aims to tackle the problem nothing will change. Pollution is no longer confined to the AQMAs.
- 33. Strategy of any kind is imperative for the health and wellbeing of residents
- 34. Diesel cars should be banned, we need action now, city centre car free.
- 35. Uses objectives such as strive, aim, work towards. Can see little evidence of education, not just in schools but in the community, and enforcement. a joined up approach with traffic and planning, and health for example
- 36. The way in which the current aims are written suggests a do minimum approach to meet statutory requirements.
- 37. Looks like a tick box exercise.

- 38. More could be done to discourage traffic
- 39. They don't go far enough. Reduce in town journeys, more Park and Ride facilities, green public transport and taxis etc. etc.
- 40. Portsmouth is one of the worst cities for AQ in a country that has ignored EU warnings.
- 41. Admirable but do not go far enough.
- 42. We need to prioritise clean air



When asked about the strategic objectives, 50.9% agreed or strongly agreed that they are appropriate to the needs of the city.

As with the previous question, individuals felt that more could be done and more details and drive were needed.

The following comments were given:

- 1. I feel they could go much further. Air pollution is having a detrimental effect on people's lives, and contributing towards deaths, so it should be given a lot higher priority.
- 2. The objectives read as if they were written by a PR agency, with no metrics, and nothing that can be pointed at to demonstrate that the strategy is not working if air quality does not substantially improve.
- 3. The document is wholly insufficient. I believe that you should take a look at something like the greater Manchester air quality strategy. This provides real objectives, specific measures and the whole document provides quality of research and law. The strategies are measurable. The PCC draft document is without sources and does not contain nearly enough detail on consultation or contributors. You would expect an academic quality. This draft air quality report appears to be a PR exercise.
- 4. The Strategy overall is weak on aspiration and on effective implementation. The strategy should have a GOAL with a realistic chance of success and timed targets to indicate progress.
- 5. It's not clear from this strategy whether the goal is to tackle a public health issue, improve quality of life or mitigate statutory responsibility.
- 6. The council doesn't commit itself to meeting any targets in this strategy. It doesn't even commit to work towards meeting statutory targets only to 'strive to consistently work

towards' them. This strategy should set targets that are measurable and commit to ensuring air pollution stays within all legal limits.

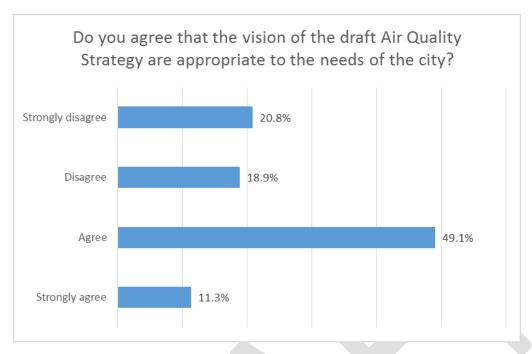
- 7. I am disappointed that the air quality strategy does not contain more specific, measurable and urgent actions, which are required to address this serious public health issue. In fact, we are in need of an immediate and strong intervention. A better plan would specify specific measures to be taken within a set time frame. Also, targets for reduced NO2 levels by particular dates should be defined.
- So 1, 2, 5 &6 are reasonable. So 3 is daft unless the Council monitors more effectively CPM 2.5s are not properly measured. So4 contradicts the joint health and well beings aim to encourage active travel because it relegates the priority of pedestrians and cyclists in favour or motorised transport. So4 is nonsense.
- 9. The objectives appear to be mutually inclusive of one another and, coupled with an effective information campaign, should allow citizens to grapple with the situation and take sustainability into account on their own initiative.
- 10. Can be measured
- 11. They do not go far enough
- 12. it offers no solutions
- 13. As stated Portsmouth is an island city with restricted roads in and out.
- 14. They seem to be well thought-through.
- 15. These seem to broadly point in the right direction, but for any objective to be useful it must have measureable outcomes so that progress can be monitored. The document is far too long but contains minimal useful detail.
- 16. Wish-washy
- 17. There is no action included on how we can use trees and plants to remove the harmful pollutants from the air
- 18. They are appropriate to the issue but also impact positively on other aspects of the economic vibrancy that the city needs.
- 19. The strategy does not commit the council to meeting any targets. It does not state that pollution will stay within statutory limits which should be a bare minimum. It doesn't even commit to work towards this very low target only to 'strive to consistently work towards it'.
- 20. The objectives set in this strategy should be clear and measurable. Strong commitments to staying within statutory limits should be the starting point, while efforts should be made to exceed them.
- 21. These objectives are not strategic, they are practical measures and as such, there is no evidence that PCC is currently heeding any of these. E.g. Has Environmental Health liaised with the Tree Department about this? Why isn't PCC tougher on engine idling? Why isn't the city expanding 20mph zones that would improve air quality? SO's 1,2,5 & 6 are acceptable; for 3 to be effective we would need more monitoring especially of the fine particulates PM2.5; and 4 is counter-productive because it deprioritises "active-travel" by relegating it at road crossings.
- 22. They are not clear and do not go far enough.
- 23. Haven't read the strategy because there was no link, I only found out about this poll through a third party and the questionnaire is not sufficient to take into account those that have not read it.
- 24. PM 2.5 is not being monitored at the roadside but at Gatcombe Park 119m away where it cannot record roadside pollution notwithstanding your reports which say recordings need to be taken at roadside. PM 2.5 is the fine particulate matter most damaging to the cardio-vascular system. You cannot claim to work collaboratively with your partners if you cannot

get First Bus to link back to the Hayling Ferry notwithstanding it was reinstated 9 months ago!

25. It is evidence based

Reducing traffic needs to be given greater priority, and not hidden within 4, but separated out, and perhaps integrated with 2 and modal shift is imperative to this and also has health and wellbeing benefits.

- 26. They encompass many key elements: working with a broad range of partners, encouraging intermodal transport as well as encouraging innovation to address these challenges
- 27. The problems in the are relatively minor and require small changes to effect a solution. Objective 4: It is important to separate out traffic reduction and traffic movement as they are different and will be achieved by different actions. We suggest that Objective 4 should focus on increasing efficiency of traffic movement by reducing congestion, stop-start travel and idling to reduce emissions ALSO This objective might encourage cleaner, lower emission vehicles in the city (e.g. via more electric vehicle charging points, low emissions vehicle policy, private hire minimum emissions, low emission buses). Objective 2 might then refer to reducing the amount of traffic via, e.g. modal shift in transport from the car to active travel supported by public transport. (This would also include such strategies as Park & Ride, city parking restrictions, allocating space for car clubs, car free days, and travel planning, and reducing freight movements.)
- 28. Because they provide a clear plan for action with measurable steps, involving all agencies including member of the public, whose experience and observations are critical. If they are implemented now, buses should be electric, that would help they don't go far enough.
- 29. They are very woolly and weak. Promoting things, increasing awareness of things will do very little. The suggesting that reducing congestion is one of the answers is very worrying indeed.
- 30. Not ambitious enough.
- 31. The objectives appear to be well defined
- 32. Too much vague aspiration and not enough action pledged



Although 60.4% agreed or strongly agreed that the vision is appropriate, a number still feels more could be done.

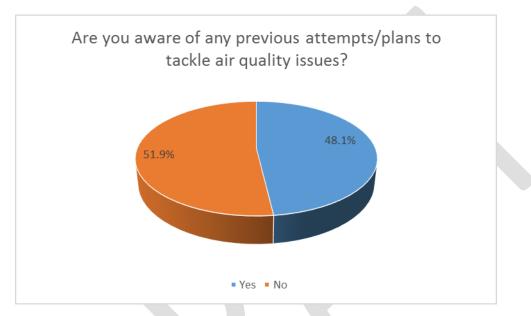
The following comments were received:

- We agree that this is a public health issue—there are no 'safe' limits to air pollution. However, it is also about creating a better city. By tackling air quality, particularly by relieving traffic congestion and making the city a more attractive place to walk and cycle, the quality of the city—for tourists, employees and residents, will improve.
- 2. I can't find any vision in this document.
- 3. For all the reasons above. This city has specific problems and specific opportunities. Apart from a very vague line drawn on a map of depravation there is no collated stats, few measures and the ' working towards' is wholly inappropriate and does not consider local issues, past data and real targets.
- 4. 1.'Closer working with partners' is too weak when the Council has so little control over them. .e.g. The Council has never effectively worked with Portsmouth University to get on top of the problem of student cars in the City. We know that you cannot prevent someone bringing a car onto our roads, but you can incentivise them by offering bribes such as gym memberships or free to loan cycles in collaboration with UNI and City to those who do not bring a car to Portsmouth. 2. We already see that there is no partnership working with First Bus, otherwise there would be a bus linking up with the Hayling Ferry. The strategy should be about enforcement and not collaboration in avoidance, if over half the City's air pollution is generated from transport then the modes of transport are too dirty and the transport infrastructure is inadequate or a combination of both. When we visit Portugal, their buses run on LPG with no pollution. PCC is fooling itself if it thinks it will ever change the transport system. 3. If you provide quality information on local air quality, what can the public do about it, not go to work that day?? It is quite unrealistic. 4. There is no need to 'develop' measures to reduce traffic and congestion related emissions, the systems already exist. You

need to introduce existing systems into Portsmouth such as the new cameras which are capable of identifying those vehicles whose emissions are above acceptable levels. These can identify the vehicle whilst on the road. We only have 3 ways onto Portsmouth, the cameras could operate at the entrance to the city and a mobile force follow them up, stop them and issue them with restriction notices banning them from future entry. 5. Stimulate sustainable citywide economic growth to reduce carbon emissions. This will only happen if there is more employment on Portsea Island. The daily grind of traffic up the M275, London Road and Eastern Road starts at 5.45am to transport huge numbers of employees out of the city. Then the return clogs up these road at night as they return to a dormitory city. The Council's City Plan must reflect policies which will govern site allocations so that they contribute to sustainable development i.e. don't designate land for housing, it just puts up the value so that it cannot be used for a new Police Hub, school, clinic, business or goods vehicle parking area. Bring in policies which prevent current employment sites, petrol stations, pubs, being turned into housing with consequent loss of employment sites within the city.

- 5. There are no clear and measurable targets, no hard commitment to staying within statutory limits, no commitment to reduce pollution by a set amount. As it is, it's not fit for purpose. It should improve public health protect is inappropriate if 95 people are dying every year due to poor air.
- 6. Important that all areas can benefit
- It is too limited for the scale of the problem because there is nothing to support it, HOW do we encourage the alternatives
- 8. Just about. Again more could be done regarding cycling, I'm thinking wider lanes for tricycles and electric bikes for maybe older less mobile people.
- 9. It's a good intention.
- 10. Vision statements are fundamentally spin to try to distract the public. We would all like to think that our council will be working to improve the city's air quality, so we can safely leave this out if we want to be taken seriously.
- 11. Corporate speak without substance
- 12. Could go further grow planting around chimneys, encourage new hotels to be creative with greenery. Protect mature trees from being destroyed in new debts. Protect green spaces.
- 13. The strategy does not include any clear and measurable targets, such as committing to staying within all statutory limits, reducing pollution by a specified percentage, extending the park and ride scheme to Fratton Park on match days, etc. Without these, the strategy does not serve its purpose.
- 14. There is no vision, otherwise why would the document contain 4 images of Spinnaker Tower? What is the relevance? How does this support your objectives?
- 15. The vision should be to improve public health not protect it. We don't want to protect 95 deaths a year we want to reduce them.
- 16. Too many schoolchildren are going to and study at schools on or close to busy roads and no legitimate Authority should fail to take action to reduce the impacts on their health and life-expectancy.
- 17. it is evidence based
- 18. The problems in the are relatively minor and require small changes to effect a solution.
- 19. This a bit of marketing spin question not worthy of serious survey.
- 20. This and much more
- 21. How long will it take? can we plant more trees, more green spaces, not give permission to chop down trees

- 22. Only if acted upon. Evidence to dates, with traffic & parking, and development of sustainable transport, suggests it isn't.
- 23. IT is a very general statement but fine.
- 24. Not ambitious enough.
- 25. More needs to be done. Population of the city is at saturation point. Perhaps the council needs to put a limit on housing development
- 26. Portsea Island is a very congested area and even those areas close to the sea or parks suffer from the bad AQ. The more deprived areas are particularly at risk.
- 27. It strives to meet legal obligations why not pledge to meet legal obligations?



Only just over half are aware of previous attempts to tackle air quality issues.

The following comments were given in relation to the question:

- 1. AQMAs
- In particular, the park and ride schemes, STTY, LSTF1 and Traffic Management Optimisation. Vague and this current draft document does not give enough detail of thugs. Why is this a question? Surely the draft document should give all this information in minute detail.
- 3. Monitoring N20 throughout City hotspots and introducing traffic management measures to mitigate, e.g. Velder Ave traffic lights. However, we remain concerned that once an ACMA has improved to below the maximum acceptable emissions level, it is deleted. Monitoring should be constant. How else can an AQMA be re-instated? New businesses or housing developments or student apartments are built in the city but there does not seem to be the will to monitor more comprehensively in order to catch new or emerging 'hot spots'.
- 4. Greater Manchester https://www.greatermanchester-ca.gov.uk/airquality
- 5. Air quality SPD 2006
- 6. Traffic management at congestion points
- 7. If there has been anything, it has failed.
- 8. Park & Ride scheme.
- 9. Monitoring routes

- 10. The cycle lanes on Havant Road.
- 11. The Greater Manchester Air Quality Action Plan <u>https://www.greatermanchester-</u> <u>ca.gov.uk/airquality</u>
- 12. The city's previous air quality documents from 2010 and 2015
- 13. The 2006 SPD; the Portsmouth Local Transport Plan & the Transport for South Hampshire
- 14. 2006 Air Quality SPD
- 15. many specific actions but no overall strategy
- 16. Aware of existing air quality monitoring and activities to get more people out of cars and reduce congestion points in the city.
- 17. Yes, but not in Portsmouth. Uber has made tangible progress in improving air quality in cities around the globe by providing a viable alternative to individual car ownership and use. We have also implemented products such as POOL (ridesharing) and Electric Vehicles that reduce the number of cars on the road and emissions.
- 18. Lorries in Anchorage Road
- 19. establishment of AQMA
- 20. AQMAs
- 21. Big Green Commuter Challenge, LSTF projects etc.
- 22. I am aware of heavy traffic routes being changed but little else.
- 23. PCC webpages on AQ, progressively weakened in recent years

When asked **'Do you consider there are barriers to the implementation of the strategy? If so, how could these barriers be overcome?'** individuals did cite lack of political will and power to implement actions. Finances were also a major consideration in the likelihood of implementation too.

The following represent the comments made to the question above:

 Political bravery and taking difficult decisions to reduce the use of private car. Budgets are a barrier. See below for some suggestions for overcoming this issue. "There are several areas where the new 'quieter ways' intersect or follow an AQMA that has been in exceedance in 2014 and/or 2015. Improvements to the walking and cycling network needs to be done with other issues in mind--including air quality and economic development.

Perception of safety is also important for achieving mode shift. Improvements to infrastructure, better adherence to the 20mph network, and more partnership working with the police on 'close pass' style initiatives will help.

There are significant barriers to improving the fleet of taxis, buses, and HGVs that travel through the city. We need to see action to incentivise cleaner vehicles for essential journeys by road while reducing overall traffic levels, so that there are both fewer and cleaner motor vehicles. This requires investment, support and a clear legal framework from UK Government, and action at regional and local levels. Funding for upgrading bus fleets, discussions with companies about consolidated delivery and last mile freight are examples of steps to be taken in partnership."

- 2. The biggest barrier is the nebulous nature of the strategy itself. What exactly is going to be implemented?
- 3. This is another pointless question. The barriers are the insufficient work done on this draft document. There are so many unexplored options it is difficult to know where to start. Why not look at the local green party's proposals in their press statement and take some tips from greater Manchester document.
- 4. The main barrier is the Council's belief in its ability to effectively implement real action. We cannot see anything in this strategy that reflects the basic fact that an overdeveloped City can enjoy cleaner air by increasing 'growth'. The strategy needs to discourage further residential development. For the most densely populated city to have experienced an increase in growth since 2001 by over 9% and the rest of SE England by less than 8% then this objective must be flawed
- 5. Because the strategy doesn't contain any measurable targets, it's not fit for purpose.
- 6. The lack of sustainable vision and authority limit PCC's ability to reduce air pollution. PCC could discourage further development rather than promote it: development pollution. It could promote active travel much better and the strategy to improve traffic that flows at the expense of pedestrians crossing the road shows the lack of vision." Without effective dissemination of information some will simply refuse to engage with the situation at hand. Right-wing popularism (UKIP sentiments, most emphatically) also appears to be markedly hostile to an environmentalist approach. Insufficient suitable public transport to meet needs of city. How does any person access a hospital, shopping or indeed the council offices by public transport?
- 7. 1 Financial ensuring that Portsmouth and the Solent Partnership access funding from government.

2. Motivation to keep Air Quality a key issue - strong activism by councillors, and ongoing publicity of action and progress.

- 8. Alternative modes of transport incentives (probably needed nationally) to phase out the use of diesel engines, and encourage use of buses / bikes for local journeys.
- 9. Yes. There are no meaningful attempts to persuade people out of their cars. Expensive, monopoly run public transport (buses), the pace of development, especially in the university quarter, and the island nature of our city combine to form a massive barrier to implementing any serious strategy. There seems to be a drive towards reducing hedges and other foliage in the city (possibly to cut maintenance costs) and this removes important insect and other species habitat as well as removing important ways to mitigate pollutants. Even the draft Air Quality Strategy document is more style than substance. It's very disappointing. These barriers could be overcome by dealing with the issues I've outlined. The epidemic of pavement cycling, putting pedestrians at risk, is an indication that our roads are congested and unsafe yet it seems more and more cars are encouraged into the city in pursuit of 'growth'. Infrastructure deficiencies must be dealt with as a matter of urgency. Parkland such as the St James Hospital site should be preserved rather than just seen as an opportunity to cram more houses (and cars) into this densely populated city. This city is flat. It is ideal for walking and (safe) cycling yet there is a seeming addiction to car travel.
- 10. People are too fond of their cars.
- 11. sheer numbers of people in the city and lack of routes in/out of city
- 12. Anyone whose business is affected. Got to put health before profit.
- 13. People are self-destructive and lazy. They will not stop driving their cars.
- 14. There is no infrastructure for charging electric vehicles; with the high percentage of onstreet, non-allocated parking in the city this is a massive issue which needs to be addressed.
- 15. Attitudes to cycling are generally poor. Cycling in combination with public transport (trains) is extremely difficult, especially at commuting times.
- 16. Lack of ambition, lack of determination, tick boxing not forcing real change
- 17. The planning committee has to strongly support the imperatives and not allow developers to strong arm them into allowing counters that do not follow the correct aims
- 18. Many measures will face resistance from the public however the policies must be shaped in such a way as to get the buy in of residents and businesses.
- 19. This question has little meaning as the strategy does not contain any measurable targets and is therefore not fit for purpose.
- 20. One of the glaringly obvious one is the Government's awaited DEFRA document that is due by end of July 2017. Would it not be sensible to wait and examine this first before deciding on how to improve air quality? Having said that, there are practical measures that could be taken already to help—green screens outside schools, tackling illegal engine idling, 20mph zones, looking at routes taken by HGVs
- 21. The Council needs greater powers over the Bus service provision: the Hayling Ferry has been back in operation for 9 months but the bus service hasn't been reinstated. Bus fares are too expensive. On a behavioural issue, car owners should not have a right to park anywhere so a greater use of permits should be introduced and pedestrians and cyclists should have priority at minor road junctions.
- 22. The biggest barrier to implementing any strategy to deal with air pollution is that this document does not have clear enough goals or a time-frame for achieving results.
- 23. The affordability of shifting to electric vehicles; the Council's inability to have no effective control over public transport and the Council's pervasive conservative culture resisting change and innovation and it's timidity in confronting challenge. The "First Bus" operator should be disenfranchised and PCC seek DfT assistance in providing a Community service with electric vehicles. PCC should be installing double yellow-lines for 200m around all

schools and residents parking permits should be restricted to the ratio of one car/household except for multi-occupation homes where it should be zero, and no permits issued to owners with cars under 5 years old. Road. Priorities should be changed so pedestrians and cyclists have priority at all junctions and road crossings.

risk of perceived impact on economic development which should be overcome by dialogue 24. "Funding - apply for things with other organisations to show commitment across the city Getting people to change habits - provide good alternatives to car travel and make brave decisions as well as educating people on the consequences of us not changing our ways. Partnership working with local groups is key here.

25. In order for this strategy to be effectively executed the council needs a joined up approach across departments, so that all aligned to achieving the aims of strategy, for example does private hire licensing support innovation and enable the aims to reduce private car ownership, congestion etc.

Persuasion

- 26. Unfortunately the difficulty of enforcing any strategies once implemented.
- 27. Individual attitude and 'way of thinking' needs to be targeted. Individuals are comfortable living normally and are not often willing to accept or try changes. Minor consequences for not adhering to new strategies OR compensations to those who do. Institutional barriers. The published strategy appears to support a do as little as necessary approach. The achievement of an Air Quality strategy needs strong leadership. There is no evidence of this in the document, and it is also demonstrated by a lack of accountability. For example, there are many examples of "consultation" with stakeholders and others but targets for reducing air quality are rarely mentioned. With over a third of the poor air quality being produced by motor vehicles, what reduction in road use and use of alternatives is being proposed? Where are the actions that prioritise sustainable transport over the motor vehicle? All I see are ways to try to improve traffic flow which, although it will have some effect, do not give a clear lead to promoting the use of buses and cycles as a sustainable alternative.
- 28. Our modern society has developed around the use of motor vehicles, so the challenge to change this is huge. However, all major cities face this problem so we can seek out good practice and benchmark ourselves against other cities. ALSO the city's parking strategy offers a lever for change. We should seek out parking strategies elsewhere that have been proven to reduce vehicles and vehicle emissions. These examples should be submitted to PCC Scrutiny Review Panel for Parking.
- 29. "Indifference Lack of money People using cars too much Ignorance of problems like idling Lack of awareness of the problems"
- 30. "PCC not honouring their commitments for reasons of ideology, funding and so on and political differences that prevent a cohesive plan. However proposals to attract more luxury cruisers to the city is counter-effective. The other major obstacle: weaning people off their cars; lack of suitable alternative means of transport and/or costs of bus travel. Awareness and education about the health risks to the population and the benefits of alternative ways of travelling. This is where members of the public can become involved, with suitable training."
- 31. Restrict further development, improve public transport to help reduce traffic. Provide more open green space
- 32. By having better forward planning on the council, plan for quality of life for residents. Lack of political courage. Diesels must be banned from urban streets.

- 33. The main barrier is political. It seems there is either a lack of understanding by some members of the council or a wilful ignorance of the scale of the problem.
- 34. Reluctance of people to get out of their cars.
- 35. No more housing
- 36. The biggest barrier is people, you need to take the public with you on this with better communication and engagement. Also allowing longer than a week for this consultation might help!
- 37. This would seem to be an excellent strategy, but needs to be promoted well. Schools, shops and businesses must all play a part.
- 38. Barriers will come from business refusing to dispose of older polluting vehicles. Commercial trucking is a big contributor particularly in Old Portsmouth and areas close to that (as is shipping). Education is one thing (to teach people to stop idling) but stricter inner city restrictions need to be implemented.
- 39. Lack of political will to tackle primary cause too many motor vehicles on a small congested island

# The following comments were submitted when asked 'Are there any alternative measures you would like to see as part of any air quality strategy?'

- The strategy should consider robust measures to tackle congestion as part of improving air quality. This should include demand management and to see use of public transport, including buses and coaches as the critical factor in achieving modal shift from private vehicle, rather than just focusing on walking and cycling.
- I have a number of suggestions for tackling air pollution across the city:

   Not enough is being done to encourage walking and cycling. A modal shift will only come if high-quality infrastructure is delivered. There needs to be a network of segregated cycle lanes across the whole city, which would significantly improve cycle safety and encourage many new cyclists. To achieve this some streets which are currently two-way may have to be made one-way, with the space saving being used to install two-way segregated cycle lanes.
   To encourage walking, more unnecessarily sprawling junctions need to be narrowed. I was pleased to note that this has happened Victoria Road North / Bradford Road junction, and at the Cambridge Road / Burnaby Road junction, but there are many more junctions around the city which would benefit from this.

•Traffic lights are currently biased against walkers, who have to wait ages for them to change, such as at Fratton Bridge. This situation should be reversed so that walkers don't feel like second class citizens.

•There are many opportunities to plant more trees and bushes around the city, which would help to improve air quality and people's wellbeing in general. There are loads of bare patches of grass and random unused areas where new planting could go. As such a comprehensive assessment should be carried out citywide looking for new areas for planting and street trees. I suggest that this new planting could be paid for by adding a say, £10 (or more?) 'Green levy' on the city's parking permits.

•Homeowners and landlords could be encouraged to return paved gardens back into green spaces by the council offering a say, 5% council tax refund for properties which maintain a garden.

•The City Council owns the land which the IOW Ferry Terminal uses in Old Portsmouth. They also own the Portsmouth International Port. Land should be made available at the Portsmouth International Port for the IOW Ferry Terminal to be moved there. This would cut out a lot of traffic from the city, especially HGV, which needlessly drive through the city on their way to the motorway, causing congestion, noise, and air pollution enroute.

- 3. Building on the 'quieter ways' scheme as part of the STTY programme, there is a real opportunity to build a mesh network across the city for people to walk and cycle. By making walking and cycling easier, more direct, and improve the perception of safety, it become s a more attractive option than driving.
- 4. The 20mph scheme has not been mentioned within this strategy. Studies have shown that, although this may increase risk of NOx, it decreases risk of PM2.5. In addition, when coupled with infrastructure improvements to achieve traffic calming and/or point closures, it encourages more people to walk and cycle.
- 5. Bus operators, as 'businesses that work with the council' are presumably included in the green fleet 'approach'. Finding funding or contractual requirements to have an improved fleet is essential, particularly as bus operators need to upgrade their fleet elsewhere and may move older buses to areas without regulations, simply shifting the problem.
- 6. Improvements to the park and ride, coupled with a parking strategy that works with the private car park operators is essential for relieving traffic congestion and encouraging mode shift within city limits.
- 7. Better defined proposals for action. In this 24 page document, a single page carries all of the proposed actions. This compares very unfavourably with strategy documents from other cities, notably Manchester.
- 8. So many! As above.
- 9. We would expect to see more measures to monitor PM2.5. Also to limit dirty vehicles by cameras as already mentioned. Using Low Emission Zones would include shipping. We would expect to see more infrastructure improvements such as ramped bridging over arterial routes- even the type seen abroad which include escalators. You cannot expect to encourage active travel if you de-prioritise pedestrians and cyclists at road crossing in order to keep the traffic flowing leaving vulnerable children in buggies choking on the fumes of passing traffic. This creates not solves a public health problem. The bridge crossing Anglesea Road was damages 10 years ago but still not repaired, this is a key area of the city.
- 10. I would like to see the introduction of more green spaces, a better cycle network across the city, an extension of the park & ride scheme to Fratton Park on match days and charging points for electric cars on residential streets.
- 11. A few specific ideas:

Ban or charge polluting vehicles, particularly diesel, as part of a low emission zone Change to use low emission buses and taxis, by requiring their use Preservation and improvement of the cities green spaces. Improve public transport, through subsidies, integrated ticketing and better interconnections. Publish public transport data using an open API under a permissive license. Improve cycling infrastructure with continuous long distance routes All planning applications and delivery to public services must be compatible with reducing car ownership Improve infrastructure for low emission light commercial vehicles Pedestrianization of town centres Charge for diesel vehicle ownership/parking locally Require shipping to improve pollution standards to operate locally

- 12. Bridge's across all main roads with ramps for pushchairs and wheelchairs. Restricted parking at or near to schools. Restrictions on cars per household by expanding the use of permits.
- 13. A great emphasis on environmental concerns in local politics overall would seem desirable, regardless of their short term unpopularity.
- 14. Require peak traffic generators to plan their needs so that peak transport times are avoided. TALK to city users and residents and COOPERATE with us on planning issues.
- 15. Education in schools, colleges, and shopping centres to inform all ages. Could the University lead on this?
- 16. A strategy that has meaningful solutions to the problems I've described is the only way forward.
- 17. Managers of businesses, schools etc. should be encouraged to facilitate cycling to work paid to install dry bike shelters. Rewarded for having employees that cycle to work..
- 18. an actual strategy rather than lip service
- 19. I just think the whole strategy needs to be linked up more with promoting walking and cycling, leading to better air and better health.
- 20. It's very clear to me, there are too many cars. People who break the law e.g. drunken driving, should be deprived of their cars for life.
- 21. Electric buses; taxis too! More consistent cycle lanes with junctions designed to allow safer & faster passage on bikes. Cycling is potentially the fastest way to get around the city, so we must work to increase this advantage along with safety.
- 22. How far does "encourage" go? How about bye-laws restricting polluting behaviour by drivers of all vehicles, strongly enforced?
- 23. Add more greenery to our city, carbon dioxide is naturally recycled by trees, get them in the ground! Many cities around the world are utilising electric busses and taxis. We should do the same
- 24. Absolutely use nature as well. Be creative and lead. Use other country examples of how to achieve this. Be the first council in U.K. to use a different strategy to support the more conventional ones which also need to be done as you have outlined in the draft.
- 25. -More solar powered buses, following the Brighton example
  - -A public transport system that fulfils the needs of all the population

-A consistent, extensive and safe cycle network across the city. NO fines should be issued to cyclists who use the pavement until this has been implemented

-An extension of the park & ride scheme to Fratton Park on match days

-The conservation of green spaces and the designation of 'healthy' walking routes for pedestrians

-The introduction of a scheme where residents can request the installation of a charging point for electric cars on their street

-Clear air zones and locations of real monitoring

-Enforcement of Road Vehicles Construction and Use Act and the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002 to cut down on polluting and unnecessary engine idling

-A comprehensive review of the city's green infrastructure and measures to ensure its protection and enhancement

26. I would like to see the introduction of a scheme where residents can request the installation of a charging point for electric cars on their street, a consistent and extensive cycle network across the city, an extension of the park & ride scheme to Fratton Park on match days and a commitment to the conservation and expansion of green spaces.

- 27. We need to see all the data and evidence to support the strategy first. And see the Government's new national strategy when it is released in draft form shortly. Regarding below continuous monitoring and assessment to measure performance outcomes is not explained in the document.
- 28. More bridges over main roads as at Hilsea Lido and the reinstatement of the bridge crossing by the railway over Anglesea Rd. Double-yellow lines around all schools for 200m
- 29. A congestion charge for the city. More routes for the 'park and ride' busses. More bus routes generally and cheaper bus fares. All busses and taxis to be required to use electric engines Road layouts that improve cyclists' safety so that more people are likely to ride bicycles rather than use cars. All new buildings to be required to install wind-turbines and solar panels to decrease background pollution.
- 30. More ramped bridges across busy highways such as near the Lido, the reinstatement of the footbridge across Anglesea Road, restrictions on further development:- the City is the most densely populated in England and it's an Island so traffic congestion is exacerbated by even further expansion. It has already exceeded the growth rates in the rest of England including the South East.(Portsmouth has "grown" by over 9% whereas the SE and England is under 8%). The city should create more local well-paid jobs to avoid the northern migration of traffic up the Eastern Road in the mornings and the return immigration in the evenings.
- 31. perhaps revisit economics of trams along high volume people routes and electric school buses. also address delivery of goods ordered online
- 32. Greater emphasis on education for young people and rest of population. Other suggestions are more tactical and would come in the action plan, which isn't available.
- 33. I think that as part of this process the next level of detail will need to be built out. Uber would be delighted to support the council in this step and in areas where we have expertise drawn on the 500+ cities we operate in globally. Areas that we can support deep dives in would be:
- 1. Low Emission Vehicle Policy
- 2. Reducing car ownership and use
- 3. Encouraging intermodal transport, with services like Uber solving for the first / last mile issue of those using mass transit systems.
- 34. I would like to see an emphasis on how people can be persuaded to travel on sustainable transport. The document seems to concentrate on continuing to achieve the status quo.
- 35. It would be good to work with PCC Planning and Parks Departments to ensure that everyone has access to traffic-free, green, attractive "clean air public spaces" close to where they live. ALSO if this strategy also concerns carbon emissions then there should be a cross-reference to PCC's Energy & Environmental Policy.
- 36. Surely an obvious thing is to make people more aware of the health and climate change issues. They should particularly be warned regularly that idling is illegal. Nitrous oxide is a seriously worrying greenhouse gas, despite its low levels and people should be aware of this. Promoting electric vehicles and charging points. Support for coherent walking and cycling strategies. Planting trees.

Using monitors to involve people. Surveys outside school gates for instance might be very effective.

Press and social media to raise awareness. Share stories from other cities which are worse. Can we get a better evening bus service?

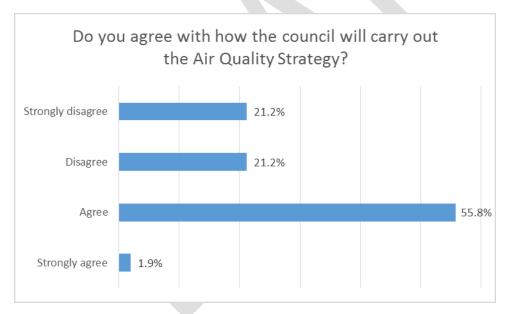
Pressure on bus companies to get more which cut the engine at bus stops.

- 37. Investment in public transport. Create and extend bus routes, don't cut them. Improved park and ride outside the city, not just for major events. Discourage heavy freight from travelling on roads.
- 38. We cannot keep building more and more houses, this increases cars on our very congested rds. Leading to more pollution.
- 39. Move the Isle of Wight ferry terminal to the continental ferry port. This would prevent hundreds of cars entering the city. More should be done to reduce the pollution from ferries.
- 40. Move PFC stadium out of the city to reduce congestion and therefore improve air quality.
- 41. Diesel buses should switch off engines when waiting for a timed departure at bus stops in Commercial Rd
- 42. The increase in the capacity of the highway network in order to reduce congestion related emissions is complete madness. Any understanding of transport modelling or even basic economics would prove this. Reducing the generalised costs of driving in and around the city by reducing congestion and hence drive times will, in the longer term increase the distances driven in and around the city. If you make something increasingly "cheaper" and easier, people do more of it. More people will choose to drive into the city rather than use public transport, or people will decide to relocate to further away and commute longer distances. Ultimately, we will still have congestion and FAR worse air pollution as a result.
- 43. Like other more progressive cities, Portsmouth should ban diesel use in the city. With Portsmouth being so flat, it is perfect for cycling, but the provision of bike lanes is terrible. PCC only seem to build bike lanes where it is easy for them to do it, so they can claim 'x' miles of bike lanes, rather than where there are needed.
- 44. Encourage electric or hybrid transport
- 45. Described above
- 46. Again, this needs to be 'sold' to everyone in Portsmouth. I took part in a Friends of the Earth air-pollution campaign which involved measuring the AQ over a period of two weeks. Living close to the sea and Southsea Common, I was surprised at the amount of particulate and NO2 problems we face.
- 47. Incentivize adoption of cleaner vehicles. Ensure ships use onshore electricity rather than their own diesel run generators. etc.
- 48. The measures indicated are suitable however, PCC's record in delivering is patchy



Although 64.8% understand how the effectiveness will be monitored, 35.2% do not and state clearly through their comments that there is a lack of measurable targets.

Over half, 57.7% agree or strongly agree with how the council will carry out the strategy. Again a number of responders do cite past failures and insufficient information as factors that influence their overall lack of agreement.



- 1. There is a complete lack of specific, measurable targets. Unless air quality in Portsmouth actually gets worse, there is nothing here whereby the council can be shown to have failed, even if air quality does not improve.
- 2. This report is shoddy and insufficient. I have studies this from PCC and other authorities and it is an insult.
- 3. Our previous points contribute to this view. The Approaches you will take are week. Will the multi-disciplinary Air Quality Steering Group include external bodies e.g. Unfriends of the Earth, Cycle Forum, Portsmouth Society, COPD group, etc.etc.lf not, why not? Minimise domestic sources of air pollution this is the CAR/VAN. Unless you introduce harsh residential parking rules this will never happen. Why don't you have cycle lane enforcement

like bus lanes? Fine people who park or drive in them. Require people to turn off engine when in queue. Recent monitoring in London indicated the worst personal pollution was measured in taxis in queues. Where are the incentives to employers to provide free minibuses for workers? When will you realise cyclists are vulnerable and know they are, unless they have a dedicated (NOT SHARED) kerbed, cycle lane. When will you work with Fratton Park to get reduced entry to Fratton Park for train users? When will you get buses lined up again to take people to and from matches? It is a farce at present that it takes 2.5 hours to get from QA hospital to Southsea by public service bus when Pompey have a Tuesday evening match - kick off follows evening rush hour. This is not a functioning, business friendly city, every business that can is moving out due to traffic chaos. We feel that this document is great on expressed concerns, poor on options for real change.

- 4. Any strategy or plan should contain SMART goals
- 5. I hope you are able to revise and significantly improve the existing draft.
- 6. PCC must monitor PM 2.5 more effectively and control car dependency.
- 7. I don't really understand exactly how it will be monitored as the draft document is too vague.
- 8. this is obviously not a council priority so nothing will actually be done
- 9. Because I do not trust the council to put this right. I am a full-time public sector worker and cycle around the City all my working days. I have lived and cycled in Portsmouth since the 1970's. The air pollution and the increase in polluting vehicles has become steadily worse. Clearly there has been and is not likely to be much change for the better despite the Strategy. The road to hell is paved with good intentions! Cycling in Portsmouth sometimes feels like hell and I am very aware of the damage I may be sustaining. My husband has COPD. He is palpably affected by the bad air in Goldsmith Avenue, for example. In my wide experience of cycling here there are some areas which I avoid: Fratton Road for example.
- 10. There is not enough detail to be able to agree; all the proposals are vague enough that simply doing nothing could probably still tick all the strategic boxes.
- 11. I'm not convinced the necessary resources will be given
- 12. Without measurable targets, the so-called strategy is not fit for purpose.
- 13. For all the reasons spelled out in the previous questions. At a very basic level, air quality needs to be improved first before people will be persuaded to adopt cycling / walking / public transport.
- 14. The biggest cause of poor air is from road traffic caused by an over reliance on cardependency and yet "active-travel" is discouraged by the shifting of the priority at road junctions in favour of the motorist. This contradicts the strategic objective of encouraging active travel in the Joint Health & Well Being Strategy 2014-17 and subjects toddlers in pushchairs to increased toxins when waiting to cross busy roads.
- 15. The measures are too weak the council need to have far more ambitious goals to improve air quality.
- 16. Because of the reasons stated above.
- 17. Unless PM 2.5 emissions are curtailed and electric vehicle acquisition can be enforced, the strategy is impotent. At the very least car-dependency should be discouraged and REAL incentives introduced for sustainable transport.
- 18. The approaches are not very clear or SMART. When will these be done? Who owns them? What if any budget is available? Who are the partners that are or need to be involved? How is any of this monitored, beyond the air monitoring? The approaches need to be clearer and more robust. E.g. Consider ways to disseminate messages about air quality...there is actually nothing here that suggests anything will be done with that consideration. Raise awareness

of air pollution...by how much, and when? How is this measurable...you could do it to a few people once and you'd potentially have done it. Set up Multi-disc steering group...is this just internal? Will external partners be on this? Many of these approaches statements are very woolly, and not clearly measureable.

- 19. There is little mention on measuring PM2.5 in the document, especially around schools and concentrations of population.
- 20. The actions linked to the current Objective 4 do not include actions to reduce the amount of traffic, just congestion. SEE OUR COMMENTS RELATING TO EARLIER QUESTION ON OBJECTIVES. A low emission vehicle policy is welcome, but we need actions not just policy. How about a commitment to more electric vehicle charging points, car clubs etc.?
- 21. It will end up as the usual talking shop which will result in very little actual action.

### Do you have any other comments you would like to make about the Air Quality Strategy?

- 1. It requires more detail on the specific measures that will be used to achieve modal shift and reduce congestion.
- 2. We look forward to working with Portsmouth City Council to address these issues-improving the health of the residents, employees and visitors in the city, and making Portsmouth a more attractive island city.
- 3. Please look at the strategy documents produced by other authorities, and come back with something much more detailed.
- 4. All said. Please look at the proposals on the recent local green party website / press statement. https://portsmouth.greenparty.org.uk/
- 5. I think we have said it all. When will the results be published? Can they be presented to Neighbourhood Forums and by whom?
- 6. The Council is not leading administration in the way Brighton and Bristol are and addressing health and environmental issues.
  This strategy is a managing strategy and not a preventative strategy.
  To be effective PCC needs to relocate Milton cross, Priory, and Portsmouth Academy for

girls, Milton Park, Copnor Primary, Trafalgar, Flying Bull and Arundel Court Schools to a better environment.

- 7. You PCC should ask why many in the city have concerns yet appear to have little knowledge of attempts to deal with air quality issues.
- 8. Keep the work in the public eye. Make use of all possible means of keeping the information and education as visible as possible. Make use of existing Council media - The Big Screen; the PCC website, banners on the main city routes, vacant lot hoardings etc. Commission young people to design the messages.
- 9. The people of Portsmouth are suffering severe health problems as a result of air pollution. We need strong, robust, detailed policies that are clearly explained (less jargon and fewer soundbites) to deal with what is an extremely serious situation.
- 10. no, I think it's obvious what I think
- 11. I think it's a step in the right direction.
- 12. I'm frightened for the children, even the unborn. There is evidence that diesel pollutants can cross the placenta and cause ADHD and autism. Also, there is a connection between such pollutants and dementia in adults. These health issues were absent from the Strategy.
- 13. Lose at least half the pages, cut out all the meaningless marketing fluff, and add in one or two real, measurable targets which you're going to aim for.
- 14. It seems like style over substance very pretty but short on concrete goals and actions.
- 15. Reduce the number of vehicles on our roads, deter our if towners from entering the city in their one person to a car vehicles, use the park and ride. Congestion charges, and restrict large delivery vehicles between certain hours. Give our children the chance to breathe clean air!!!
- 16. Think outside the box use every measure, not just reducing transport emissions. Introduce a tram system. Frequent, reliable using alternative fuel. Stop the reduction and frequency of buses and reducing the routes. Tax the home owner's third cars.
- 17. We want to see results. Less hgv's, more provision for bikes, less pollution from city based businesses. Cleaner busses and most of all keep the citizens of the city informed! I only found this survey by chance, the council should be doing far more to publicise this type of survey & results they produce.

-Needs more credible sources and details of relevant law

-Should give all of the facts to help Portsmouth residents to understand the global issue as well as more specific local information that pertains to our local environment and the particular challenges we face

-Should contain measurable, specific and time bound outcomes

-Should contain details about how the council intends to measure

progress/performance/success, what their baseline figures are and what their benchmarks will be

-The council should work with their Tree Department, as trees can absorb harmful emissions -What happened to the dismissed 8 air quality monitoring stations?

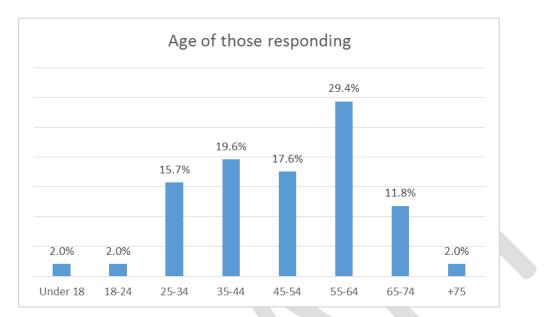
-The Index of deprivation and the line drawn for where pollution levels are currently monitored is poor and there is absolutely no specific monitoring of outcomes here"

- 18. We think it is very important that the strategy and action must be focused on the real issues. Nearly 50% of the issue is Car and HGV so this is where the focus should be. Too often buses are as a quick win - yet in Portsmouth they represent a very small amount of the pollution and that is declining as new technology becomes available and is deployed. Buses also move a huge number of people and thus if there was a measure of pollution per passenger mile they would actually come out as a very small issue in the city.
- 19. The document cites 95 premature deaths per year being attributable to air pollution, however this seems to only account for particulates. The figure often quoted is 600, which includes NOX and possibly other emissions. The EIA does not take account of health inequalities in terms of how air pollution disproportionately affects the very young and old (i.e. AGE) and those with mobility issues.
- 20. The City has seen too much growth in population over recent years: in 2011 it was 203,000 and in 2014 it is 216,000 & in the next 20 years it is expected to rise to 238,000. Being an Island and the most densely populated City in England, this magnitude of growth can only exacerbate poor air. Restrictions should now be imposed on further housing expansion and instead concentrated towards greater employment. Many more cars head north up the Eastern Road between 06.30 & 09.30 than inbound with the reverse trend in the evenings.
- 21. I have very little faith in this strategy and my children and grandchildren deserve better.
- 22. Great to see a long term strategy. Please feedback progress regularly, perhaps yearly in Flagship.
- 23. On page 7 where does this data come from? Sources and dates should be given. It would also be useful to include the percentages on the diagram. Have any partners/community groups been involved in developing this strategy? If so, who, list endorsements...if not, why not? From a design/copy perspective, the background image on page 17 makes the image on SO 1 very hard to see. And on page 22 there is an extra unrequired space at the start of the second line. As DEFRA will be releasing new guidance on air quality during the next few weeks, it would good to include relevant info on that as it becomes available.
- 24. Portsmouth absolutely need to focus on developing public transportation with more buses, more frequently and make it more affordable. We should also continue to develop and promote cycling within the city and dedicate more places for pedestrian only. Also, to help reduce air pollution, Portsmouth should consider planting trees wherever possible
- 25. I welcome this strategy and the vision of PCC. Uber would love to be a part of the solution and partner with the council to build innovative solutions to solve these pressing air quality issues

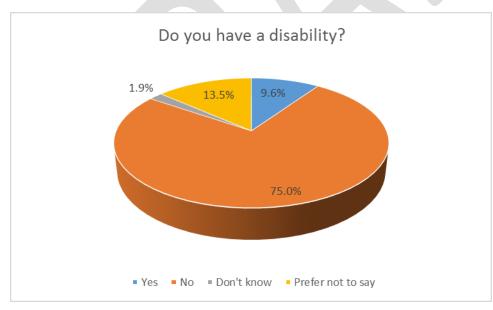
- 26. Whilst I agree it is very important for our future, I think many people (whether individuals or companies) find carrying out changes difficult. Overall I am not sure how well the changes can be implemented and monitored. It needs a great willingness from so many in different areas to achieve the required results.
- 27. You cannot expect to reduce vehicular emissions by increasing development. Portsmouth is the most densely populated City in England and much of it is on Portsea Island. It is both perverse and illogical to continue to promote residential development on Portsea Island if the main mode of transport is the private car and most of the employment opportunities are off the Island. The Eastern Road is a continuous procession of cars heading north between 06.30 & 09.00 weekdays and southwards from 16.30-19.00 exceeding the contra-direction journeys by several hundreds if not thousands.
- 28. Most people will not read the full document unless they are extremely interested. Making a shorter more succinct document for the general public would probably achieve more. Too many pages and too many words!
- 29. We welcome the introduction of an Air Quality Strategy for Portsmouth. It would be helpful to include percentages in the diagram of of sources of pollutants (page 7). It would be useful to have data about diesel v petrol vehicle emissions for cars, if available, as this may well be something that changes in the future.
- 30. This is a really important issue and it's strongly linked with tackling climate change. We should be working on both issues at once. Cut emissions in every way possible, encourage clean energy.
- 31. I hope that this survey is not just lip service; I would like to see these plans put into action, including practical ways of involving the public.
- 32. Until the city bans diesel vehicles there will be no improvement in air quality.
- 33. It is depressing that some politicians are so pitifully ignorant of some basic facts. To then suggest that the policies will be backed up with evidence is odd given the lack of evidence for the kinds of things being proposed. If you want fewer people to drive or people to driver fewer miles, then the costs of driving need to increase compared to the costs of the alternatives.
- 34. Portsmouth has one of the worst air qualities in England (other than London). The council needs to act faster and more rigorously than laid out in the plan, in my view.
- 35. It does not state that engine idling is illegal. It doesn't state what metrics will be used to measure progress. It doesn't reflect the recent decisions made by PCC that encourage more polluting road traffic and degrade environmental quality.

# Demographic Breakdown

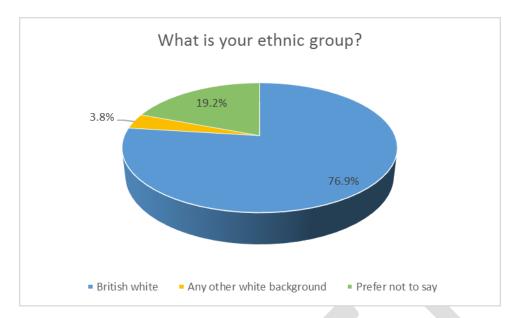
Of those responding 46.15% were male. A further 46.12% were female and 7.69% preferred not to indicate. Typically more women than men respond to consultations, therefore the response breakdown is more representative based on gender than is usually the case.



Sixty percent of responders were over 45 years old. Again this is in line with responses to most consultations carried out by PCC.



Of the 58, 9.6% indicated they had a disability.



Typically responses to consultations are primarily made up of around 94% White British. In this instance it is much lower but an unusually higher number than usual opted not to say.

# Additional Feedback Received regarding the strategy

# Feedback One - received from individual by email

Dear Cllr Fleming,

Hopefully Cllr Stubbs was able to update you on the meeting I had with him recently to talk about advances in low emission vehicles including hydrogen buses and fuel cell range extenders for electric vans.

I also recently met the Birmingham City Council officer who is involved in their recently approved fuel cell bus project (which the government is part-funding) and she expressed willingness to meet in Portsmouth to discuss their experiences. If that is of interest please let me know.

I note that you are currently consulting on your AQS document and have a few observations, which hopefully might add constructively to the process:

1. There is currently no specific mention of the useful role of green infrastructure. Trees play an important role in the removal of contaminants from the air and this has been shown in the iTree project, which the Forestry Commission has embraced in the UK. Below a link and attached a summary for Portsmouth from 2015. I think you could win some friends by incorporating something in your strategy and it neatly ties in with national planning policy guidance on green infrastructure.

# https://www.forestry.gov.uk/fr/itree

2. Carbon code managed woodlands can attract investment from organisations wishing to offset unavoidable emissions e.g. gas heating. If these could be introduced to Portsmouth it would have the added benefit of absorbing also contaminants. Last year I approached Andy Knight on behalf of a client to see whether something could be done jointly with PCC. Sadly funds were unavailable on PCC's part at the time to do preliminary research. Perhaps now that could be revisited ? I am copying Andy for his interest.

3. On a practical note the AQS document has a vast amount of colour and includes several photos of the Spinnaker Tower (the relevance of which is not obvious to me). In the interests of sustainability and setting a good example could PCC perhaps condense the document and make it printer ink friendly ?

4. Presumably PCC will consult again when DEFRA have published their final AQ strategy ?(deadline 31July 2017). I mention this because unfortunately many local people tend to miss consultations. And they may have a lot more to say after 31 July as the government strategy will get national media coverage. Perhaps you would confirm.

Finally, I am also copying David Williams for his interest. I see real potential here to do a hydrogen refuelling station (HRS) project in the City that could serve zero emission fuel cell buses (initially a pilot fleet for Portsmouth working with First Bus) and also PCC, NHS and University service return to base fleets (using fuel cell range extender vans). In this respect I have some industry contacts with both the HRS manufacturers and the likes of Shell (who also do low particulates GTL diesel). Again they would be willing to partake in discussions.

# Feedback two - FOOPA Feedback - Received via email pdf. (full pdf. attached)

### Headlines

- AQ strategy is glossy and aspirational Why only striving and not delivering? not binding commitment
- 95 premature deaths annually in Portsmouth attributed to PM 2.5 particulate air pollution how many more deaths in Portsmouth from other air pollutants such as nitrogen dioxide?
- Need to revise AQS in light of new DEFRA AQ consultation focusing on nitrogen dioxide air pollution
- Need to enforce regulations on unnecessary engine idling
- Lord Montgomery Way air quality above legal limits
- This is where more Wightlink traffic will be driving
- What is PCC doing to reduce air pollution in Lord Montgomery Way and by when?
- Need to avoid complacency
- Need for accurate measurements of active travel (walking and cycling) to form reliable baseline for monitoring progress
- Must improve AQ before expect modal shift to walking and cycling

# FULL SUBMISSION IN ACCOMPANYING PDF. DOCUMENT

#### Feedback three - HIGHWAYS ENGLAND - received via email

Thank you for inviting Highways England to comment on the Draft Air Quality Strategy - Consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M27, M275 and A27.

We have reviewed consultation and can advise that primary responsibility for addressing the Air Quality Management Areas (AQMA) rests with the relevant local planning authority (LPA). However, where the SRN is identified as a significant contributor to air quality issues, Highways England will work with the relevant LPA to identify how the issue can be improved

I hope the above information has been useful, please do not hesitate to contact me if you have any queries.

#### Feedback four - Natural England - received via email

Thank you for very much for consulting Natural England on the Draft Air Quality Strategy for Portsmouth City Council. Natural England has no comments on the draft Strategy.

Natural England is working with the PUSH authorities with regard to the Air Quality Impact Assessment of the proposed development under the PUSH Spatial Position Statement. Consideration is being given to human health and air quality objectives at the European sites.

#### Feedback five - Go South Coast - Received via email in pdf. format

Introduction Go South Coast operates across the south coast with its core networks based in Poole, Salisbury, Eastleigh, Swindon and the Isle of Wight with smaller depots at Bournemouth, Swanage, Ringwood and Totton. With a fleet of 736 vehicles across all brands, we help our customers make over 47 million journeys every year. Bus services are provided primarily through the route networks of more bus, Salisbury Reds, Thamesdown and Bluestar serving the Dorset, Wiltshire, Swindon and Southampton areas and Southern Vectis on the Isle of Wight. These networks are in the majority commercially operated but there is significant involvement in the tendered local bus market, together with school and college movements. The prestigious contracts to operate bus services for the University of Southampton - Unilink & Bournemouth University - UNIBUS are currently held, together with contracts for other higher education providers. We aim to provide customers with the best experience possible when they travel with us. In order to achieve this we are constantly investing in our fleet and staying ahead of competitors with innovative onboard technology from free wifi to USB charging points and smart ticketing. Go South Coast welcomes the opportunity given by Portsmouth City Council Ait Quality Strategy and whilst we currently do not operate in Portsmouth we make the following comments. We support strategic objective 2, however consider this should be expanded to include the contribution public transport can make, both in terms of overall modal shift but also in terms of the ability to reduce Co2. In addition we would support the use of Euro VI technology within Portsmouth to add to overall improvements in technology.

#### FULL SUBMISSION IN ACCOMPANYING PDF. DOCUMENT

# **Final Comments**

- For the main questionnaire we received only 58 responses. This low level of response is often typical of overall responses to strategy consultations. However, while not unusual, data from this questionnaire cannot be classified as 'robust' and should be viewed as providing insight only.
- Overall individuals did agree with the vision and approach, however many of those who provided commentary did feel that the strategy did not go far enough and more could be done.
- Given some of the comments, consideration should also be given to including more details around limitations and the barriers that PCC face realistically, i.e. the ability to exclude diesel cares from the streets of Portsmouth perhaps don't fall within the gift of PCC, nor does 'forcing' a commercial company to adopt a greener technology. Clarity over such things may allow for greater transparency and also temper residents' expectations.
- From comments received, the need for clearer/measurable targets to be included seems a reasonable expectation.