

Proposed Revocation Cribbs Causeway Air Quality Management Area

Consultation Output Report

South Gloucestershire Council

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1. Key Findings

Half of the all responses we received (19 out of 38) are not in favour of revoking the AQMA at Cribbs Causeway, while just under a quarter of responses (9) support it, with the remaining respondents either unsure or not stating an opinion.

Respondents who are against the revocation are most likely to live near the AQMA or work near the AQMA.

Overall, the majority of respondents answering the survey were very concerned with the air quality in South Gloucestershire.

The main reason for objecting to the revocation of the AQMA was the expected future increase in traffic due to planned housing development and the possibility of more employment in the area.

2. Consultation purpose, methodology and response

Research Objectives

The purpose of this consultation was to seek views from local residents, and organisations on the proposed revocation of the Cribbs Causeway Air Quality Management Area.

Methodology and Response

The consultation was open from 30th January 2019 until 20th March 2019

The consultation process was supported by a dedicated consultation webpage which hosted all consultation documents, an online survey and a paper survey to download. The online consultation system sent out a notification to registered users informing them of the consultation and providing links to this information:

https://consultations.southglos.gov.uk/consult.ti/Cribbs_AQMA/consultationHome

As part of the consultation we also welcomed comments made online, by letter, email, or over the telephone and these contact methods were promoted on consultation literature.

Consultation information was sent to Town and Parish Councils, South Gloucestershire councillors and local voluntary and community organisations. Notifications were also sent to a range of other stakeholders and interested parties. All libraries and One-Stop Shops were also notified of the consultation details and asked to cascade the information to any interested parties.

A survey was available in online and paper format throughout the consultation.

The survey received 34 responses, with 32 online submissions and 2 paper surveys completed. The council also received four emails, but no letters or telephone calls. The total number of responses to the consultation was 38.

General Caveats

The results of this consultation may not statistically representative of the views of South Gloucestershire residents due to the nature of the consultation methodology used. The level of response, information gathered and views obtained still provide a

useful indicator of wider opinion and any important issues that will need to be considered.

Due to the software used and the different response options open to respondents, it was possible for people to submit more than one response. This has been monitored during the consultation period and analysis and it does not appear to have been abused or be a significant issue affecting the response.

Any obvious duplicate comments, personal information and comments that can identify individuals, have been removed from the comments analysis.

Percentages used in this report have been rounded and may not add up to exactly 100%. For some survey questions, respondents could select more than one response which also means that percentages or number of responses, if added together, can total more than 100% or more than the number of responses received.

We have included all responses received direct to us as part of this consultation, and where our attention has been drawn to them, comments made via social media, have also been included. However there may have been other comments made in other media which we are not aware of.

This report was produced by South Gloucestershire Council's Corporate Research & Consultation Team.

Further information about this report is available from the Corporate Consultation Officer:

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✉ consultation@southglos.gov.uk

💻 www.southglos.gov.uk

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3. Survey Analysis

3.1. Overall Response

Overall, the majority of respondents answering the survey were very concerned with the air quality in South Gloucestershire (20 out of 33), with almost all the rest being 'fairly' concerned (10 out of 13).

Table 1 Q1 “How concerned are you about air quality in South Gloucestershire?”

Answer	Number of respondents
Very concerned	20
Fairly concerned	10
Neither concerned nor unconcerned	1
Fairly unconcerned	-
Not concerned at all	2

Base: all respondents (n=33)

The high concern over air quality in South Gloucestershire in general may explain why just over half of survey respondents (18 out of 33) are not in favour of revoking the AQMA at Cribbs Causeway, and only a fifth of the survey respondents support it (7 of 33).

Respondents who are against the revocation are most likely to live near – but not in - the AQMA (10 out of 14 respondents who live near the area do not support the proposal vs. 2 who do) or work near – but not in - the AQMA (4/5 who work near the area do not support the proposed revocation).

Table 2 Q2 “Do you support the revocation of the Cribbs Causeway Air Quality Management Area (AQMA)?”

	All respondents	Q1 Concern with Air Quality	
		Concerned	Not concerned
Base	33	30	3
Yes	7	5	2
No	18	18	-
Unsure / don't know	8	7	1

Base: all respondents (n=33)

Table 3 Q2 “Do you support the revocation of the Cribbs Causeway Air Quality Management Area (AQMA)?”

	Total	Do any of the following apply to you?				
		I live in the AQMA	I work in the AQMA	I live near the AQMA	I work near the AQMA	None of the above
Base	34	2	4	14	5	12
Yes	8	1	2	2	-	3
No	18	1	1	10	4	5
Unsure / don't know	8	-	1	2	1	4

Base: all respondents (n=34)

The main reason for objecting to the revocation of the AQMA was the future increase in traffic due to planned housing development, and potential increase in volume of commuters due to more jobs in the area, which some respondents felt meant may adversely affect the air quality.

Q3 “Do you support the revocation of the Cribbs Causeway Air Quality Management Area (AQMA)?”

Comment	Do you support the revocation of the Cribbs Causeway Air Quality Management Area?
The air quality at Cribbs is passed to all adjacent areas by the prevailing wind. The increase in traffic at the Cribbs Causeway roundabout due to the development of Filton Airfield has only just started. Coupled with the development planned for Cribbs Causeway this will increase exponentially with a resultant substantial impact on air quality. This will be exacerbated by queuing traffic. It is fundamentally important to have the highest level of air quality and the only way this will be achieved is by a root and branch redesign of the motorway Junction. The current situation is not helped by the continued expansion of Bristol Zoos wildlife centre which seems to completely ignore the original planning conditions of 5 years ago. The current arrangements for both cycles and pedestrians are very poor and susceptible to pollution damage.	Yes
Money would be far better spent on the basic street hygiene on the roads approaching Junction 17 and for that matter J 16. All the gutters remain unswept ; piles of detritus, not merely leaves but no doubt rubber and other particulates from vehicles form a slurry in the rain and become wind blown in dry conditions. The piles are so thick in places that the kerb is not visible and weeds grow in places providing proof that no regular cleansing routine exists. So men with shovels would do more to improve air quality than monitoring.	Yes

<p>I note that monitoring is to remain, and this is important given the development plans for the area. The decision to remove seems reasonable given the technical evidence and statutory definition of an AQMA. However, we should remember that the WHO guidance on air quality indicates that there is no know safe level of exposure to diesel exhaust emissions in particular and that therefore achieving the air quality limit values is not an indication that there is no harm to humans, merely that that the harm is reduced. However, this remains true across South Gloucestershire.</p>	<p>Yes</p>
<p>It seems to me pointless to continue spending money on survey activities in the area when the levels are well within the present defined limits. Quite why the levels have fallen may be a subject of some debate, is it improved diesel engines and exhaust management? In the longer term the increase in electrically powered vehicles will provide a solution to emission problems. It will require more dynamic action from central government in this area.</p>	<p>Yes</p>
<p>Current level may be okay but we have concerns over increased traffic making position worse in future</p>	<p>Unsure / don't know</p>
<p>The commercial building at the Mall will have filtration on the air-conditioning. Air quality information in the towns and villages, and next to the schools, is surely more important, as that is where people live, and sleep. This proposal and the principles of 'Air Quality Management' should be fully discussed, following a presentation to the Town & Parish Councils Forum, where representatives of all the elected Towns and Parish will be able to give full consideration of the issue and make positive suggestions. To put this out on the consultation page in this way is too hit-and-miss. Next question asks if I live/work/play in the AQMA... I don't know.! .. Perhaps you need to make a presentation to the Community Engagement Forum(s) so that people are more aware..</p>	<p>Unsure / don't know</p>
<p>Although not at or near the target threshold for further action the NO2 is rather higher than normal. Given the congestion peaks that regularly occur in the area I imagine the threshold is passed for short periods quite often. I would suggest peak pollution analysis rather than annual mean should be installed.</p>	<p>Unsure / don't know</p>
<p>Concerned about increased traffic levels with all the new development ahead.</p>	<p>Unsure / don't know</p>
<p>Is there a cost to this air quality management area? You state the reason for the decline is due to the pinch point investment (meaning the traffic is flowing better) but has the traffic decreased in the area due to other factors (decline of shopping as a whole for instance)? This decline should be better publicised it is a GOOD NEWS STORY! That section of road is a car park throughout the summer months so I would suspect the decline has more to do with the lower emissions of modern cars rather than better traffic flow. The public should be made aware of this!</p>	<p>Unsure / don't know</p>
<p>Traffic in this area is increasing year on year. MoJo, Hydrock, Wild Place, The Wave, Ibstock, Redevelopment on Cribbs & Filton airfield, New Ice Rink etc opposite The Vue. Over Lane already a cut through to avoid Motorway jams. Just how much more traffic can Junction 17 take?? New incinerator in Avonmouth & traffic fumes in this area must be at the very limits !!!!! KEEP AQMA</p>	<p>No</p>

There is no benefit to the removal of this. We have massive issues with traffic congestion in the area, so by keeping the air quality measured maybe it will give SGC some motivation to address the traffic problems.	No
This would be a bad time to remove monitoring . Traffic is likely to increase : Toll removal on Severn Crossings and use of B4055 as a short cut . Possible expansion of The Mall, further development, Ice Rink , Development of Filton Airfield. Continuing expansion of Wildplace and The Wave Surfing lake . Expension of Western Approach Business Park and increase commuting that takes place on B4055 as a result. Removal now adds to the fear that pollution may increase , but SGC would rather not know about it !	No
With the increased housing being built and the corresponding increase in heavy and light traffic in the area, it would make sense to keep the AQMA in place, and maybe even expand it to cover the new housing areas. Is there a cost implication to this?	No
The figures are average figures and the document does not show the peak levels which are probably present during peak hours and during the maximum flow into The Mall etc on Saturdays and during the run up to Christmas. Surely peak levels are as important as average levels which will include night time when the Junction is virtually vacant. With the development of the new Junction on M49, the increased industrial development on Severnside, the new "Wave Pool with increased traffic through Easter Compton, the Air Pollution problem will not go away. Easter Compton is now surrounded by Motorways so that no matter what the prevailing wind, we always have air from the Motorways. We need increased surveillance of Air pollution in this area, not less.	No
Have you seen the recent climate change news about doing EVERYTHING we possibly can to keep global warming to less than 1.5 degrees celcius? You must have done. We cannot be complacent. You need to keep on improving Air Quality no matter what. Do not slack off.	No
This area should continue to be monitored, considering the proposed growth in housing [and therefore traffic] on Filton airfield. It's great that average NO2 measurements are within limits (and improved after junction improvements) but (a) what about peak readings, and (b) if this changes in future due to traffic flow the council, and resident, should be aware of this.	No
I feel this shouldn't be revoked. Air quality in certain weather conditions is noticeably worse. Sometimes breathing is more difficult.	No
I'm interested in the future as much as the past. How will we know if air quality deteriorates is there is no testing?	No
With air quality being such a huge problem in the UK at this time, it does not seem appropriate to be revoking any air quality management areas but rather to continue or extend air quality monitoring. If there is a future spike, how would it be known?	No
The document only lists AQMA results up until 2017, is there any reason why 2018 results have not been included in this document?	No
The rationale for revocation is not valid i.e. sustained readings below national average is not a good reason to stop focusing on a potential problem. As an illustration of why using national averages is not valid, consider a completely different problem: obesity. In 1993, 53% of the UK population were considered to be overweight or obese meaning	No

that the average weight of a British citizen was xx kilograms. In 2016, this figure had risen to 61% and this means that the average weight of a British citizen was heavier than before. Does this mean that people assessed as overweight or obese in 1993 were no longer overweight or obese if you were measuring them by today's standards? Obviously not, because a healthy weight and BMI is a static measure and not influenced by national averages. Thus, removing the focus on air quality because there are some places in the UK with worse air quality is dangerous logic.	
I could only find data for 2008 to 2010 and that data appeared to be questionable. Site 81 appears to show an increase from 2008 to 2010 and in 2010 Nitrogen Dioxide levels very significantly exceed 40 µg/m ³ at this site. It should be noted that sites 33 and 80 also exceeded the 40 µg/m ³ objective in 2009 but were not recorded in 2010. The data is incomplete. It would be more interesting to know if the 200 µg/m ³ objective is exceeded more than 18 times per year. In an area that is subject to rush hour congestion this objective is probably the most critical. I must also question why in 2019 we are making a judgement on 2010 data. Does South Glos. Council have access to recent data that is not publish in this consultation?	No
You have just approved a scheme to improve the Severnside flood defences . This involved cutting down 500 mature trees, over 500 young trees and 4km of mature hedgerow. The materials involve over 50,000 additional truck movement and construction plant will consume at least 1000 tonnes of diesel fuel. You are doing this to create over 12,000 new jobs, people who will be forced to commute by car to their jobs due to absence of adequate public transport, a great many will commute along the A403 in polluting cars. These jobs will greatly increase the number of truck transporting goods in and out of the region - along the M4/M5/M48/M49 and local main rods. It is irresponsible to permit and encourage this type of local pollution whilst proposing the means to effectively monitor its effect.	No
Traffic will be increasing in this area due to ongoing large scale housing developments and additional retail developments, all will have an impact on the air quality which needs continual monitoring and this means should not be removed.	No
This was considered at the Town Council meeting on the 12th February 2019 and they do not support the removal due to the high levels of air pollution around the Mall	No
anything to maintain or improve air quality standards should be retained to force developers to have ingrained practices from the start of their developments design process.	No

Base: all respondents answering Q3 (n=26)

3.2. Profile of survey Respondents

Q4 Do any of the following apply to you?

	No. of respondents
Base	34
I live in the AQMA	2
I work in the AQMA	4
I live near the AQMA	14
I work near the AQMA	5
None of the above	12

Q6 Your age:

	No. of respondents
Base	33
Under	-
16 - 24	1
25 - 44	9
45 - 64	10
65 - 74	7
Over 75	4
Prefer not to say	2

Q7 Your gender:

	No. of respondents
Base	34
Female	11
Male	21
Prefer not to say	2

Ethnicity Aggregate based on Q9 "Your Ethnicity"

	No. of respondents
Base	29
BAME & White Other	1
White British	28

Q8 Do you consider yourself to be disabled?

	No. of respondents
Base	33
No	28
Prefer not to say	1
Yes - Physical impairment	1
Yes - Sensory impairment	1
Yes - Mental health condition	-
Yes - Learning disability/difficulty	-
Yes - Long standing illness or health condition, such as cancer, diabetes, chronic heart disease or epilepsy	2
Yes - Other (please state)	-

4. Other representations

4 emails were received regarding this consultation

Respondent	Comments
Environmental Monitoring Bath & North East Somerset Council	As the annual average concentration of nitrogen dioxide is consistently below the national air quality objective of 40 µg/m ³ Bath & North East Somerset Council agrees with the decision to revoke of the Cribbs Causeway AQMA.
Monmouthshire County Council	I have reviewed the consultation document on behalf of Monmouthshire County Council Environmental Health and I would support your proposal to revoke the AQMA in light of the 7 years of diffusion tube (including triplicate) monitoring that have identified that the nitrogen dioxide objective level has not been exceeded.
Pilning & Severn Beach Parish Council	<p>Dear Sir/ Madam,</p> <p>Thank you for the opportunity to comment on the proposed removal of an Air Quality Management Area located next to the M5 Junction 17 roundabout.</p> <p>Pilning & Severn Beach Parish Council strongly object to the removal of the AQMA located next to the M5 Junction 17 roundabout for the traffic related pollutant nitrogen dioxide.</p> <p>M5 Junction 17 has a huge traffic load which is only due to increase sharply with the housing developments which have been approved in the immediate catchment of the Junction. In addition to this, the leisure facilities of the Wild Place and Bristol Golf Club as well as employment at Western Approaches all have their impact on the level of traffic at the Junction. With all these factors in play, it is vital the AQMA is continued to be monitored at the current location.</p>
John Blight (Stoke Lodge and The Common Parish Councillor)	Please advise what other areas/locations AQMA's are currently operated in South Gloucester by S.G.C.

Appendix – copy of survey



Public consultation on the proposed revocation of the Cribbs Causeway Air Quality Management Area

South Gloucestershire Council is proposing to revoke (remove) the Cribbs Causeway Air Quality Management Area (AQMA) located next to the M5 Junction 17 roundabout. The AQMA includes a single residential property and was originally declared in April 2010 for the traffic related pollutant; nitrogen dioxide (NO₂).

You can find out more about the AQMA on our consultation page:
https://consultations.southglos.gov.uk/consult.ti/Cribbs_AQMA

To have your say on whether we should remove the AQMA, please complete this survey by **Wednesday 20th March 2019**

Q1 How concerned are you about air quality in South Gloucestershire?

- Very concerned
- Fairly concerned
- Neither concerned nor unconcerned
- Fairly unconcerned
- Not concerned at all

Q2 Do you support the revocation of the Cribbs Causeway Air Quality Management Area (AQMA)?

- Yes
- No
- Unsure / don't know

Q3 If you have any comments on the proposed revocation of the air quality management area, please let us know

About you

This section is really important as it helps us to gain a better understanding of the views of different people and how they could be impacted by any changes. This information will remain confidential and will be used for analysis purposes only. Your personal information will not be published and individuals will not be identified.

Q4 Do any of the following apply to you?

- I live in the AQMA
- I work in the AQMA
- I live near the AQMA
- I work near the AQMA
- None of the above

Q5 Please tell us your full postcode:

Q6 Your age:

<input type="checkbox"/> Under	<input type="checkbox"/> 45 - 64	<input type="checkbox"/> Prefer not to say
<input type="checkbox"/> 16 - 24	<input type="checkbox"/> 65 - 74	
<input type="checkbox"/> 25 - 44	<input type="checkbox"/> Over 75	

Q7 Your gender:

<input type="checkbox"/> Female	<input type="checkbox"/> Male	<input type="checkbox"/> Prefer not to say
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Q8 Do you consider yourself to be disabled?

No

Prefer not to say

Yes - Physical impairment

Yes - Sensory impairment

Yes - Mental health condition

Yes - Learning disability/difficulty

Yes - Long standing illness or health condition, such as cancer, diabetes, chronic heart disease or epilepsy

Yes - Other (please state)

Other, please tell us:

Q9 Your ethnicity:

<input type="checkbox"/> Arab/Arab British	<input type="checkbox"/> Mixed/Multiple Ethnic Groups – White & Asian
<input type="checkbox"/> Asian/Asian British – Bangladeshi	<input type="checkbox"/> Mixed/Multiple Ethnic Groups – White & Black African
<input type="checkbox"/> Asian/Asian British – Indian	<input type="checkbox"/> Mixed/Multiple Ethnic Groups – White & Black Caribbean
<input type="checkbox"/> Asian/Asian British – Pakistani	<input type="checkbox"/> Mixed/Multiple Ethnic Groups – Other (please state)
<input type="checkbox"/> Asian/Asian British – Chinese	<input type="checkbox"/> White – English/Welsh/Scottish/Northern Irish/British
<input type="checkbox"/> Asian/Asian British – Other (please state)	<input type="checkbox"/> White – Irish
<input type="checkbox"/> Black/African/Caribbean/Black British – African	<input type="checkbox"/> White – Other (please state)
<input type="checkbox"/> Black/African/Caribbean/Black British – Caribbean	<input type="checkbox"/> Other ethnic group (please state)
<input type="checkbox"/> Black/African/Caribbean/Black British – Other (please state)	<input type="checkbox"/> Prefer not to say
<input type="checkbox"/> Gypsy or Traveller of Irish Heritage	

Other, please tell us:

Thank you for taking the time to respond to this survey.

Please return this survey or any comments by **20th March 2019** by post to:
South Gloucestershire Council, Corporate Research & Consultation Team, Council offices, Badminton Road, Yate, BRISTOL, BS37 5AF

By completing this survey you are positively indicating your consent for us to use your information of the purposes of this survey. As this survey is completed anonymously it is not designed to collect your personal information. However any personal information that you have supplied (e.g. in comment boxes) will be held by South Gloucestershire Council in accordance with the Data Protection Act. This information will only be used as part of this exercise and will not be published or passed onto any other organisation.