

Dear Mr Fox,

April 2018

Regarding your query, and as you mention in your email, South Oxfordshire District Council has been and will continue to monitor Air Quality in Wheatley. The Nitrogen Dioxide (NO₂) monitoring device (diffusion tube) show concentrations well below the threshold (annual mean of NO₂ 40µg/m³) indicated by both European and National legislation (https://uk.air.defra.gov.uk/assets/documents/Air_Quality_Objectives_Update.pdf).

In fact, the data we've been collecting shows a decrease in NO₂ concentration in Wheatley in the last decade, as you can see in the figures attached to this email. The district council only has a duty address poor air quality and then act where the nitrogen dioxide levels are close to or exceeding the annual mean level.

The council's Low Emission Strategy (adopted Nov 17) has a number of measures designed to improve local air quality across the district. I am new to the council, but over the coming month's we should be publicising this Low Emission Strategy and developing some of the actions within in.

It seems the main concern for the neighbours in your consultation is traffic management, this is not a district council function. I therefore recommend you raise these issues with the County Council's Highways department. (<https://www2.oxfordshire.gov.uk/cms/content/contact-traffic-regulations-team>).

If you do have any other AQ queries in the meantime, please do not hesitate to get in touch at this email address.

Kind regards, Carmen Cubillas Martinez

Air Quality Officer, South Oxfordshire District Council

Dear Mr Fox,

Thank you for your email, I am a bit confused about what this refers to? Who did you speak to historically? Was it Claire Spendley our Air Quality Officer? Claire has now left the organisation. Do you have a bit of background to this?

What are you wanting from us?

Regards

Simon Hill

Environmental Protection Team Leader

South Oxfordshire District Council

Dear Ms Cubillas Martinez,

Thank you both, Simon and yourself, for the prompt response. I hope we can make this a positive discussion at this stage (pre-Submission) of our Neighbourhood Plan.

We are on the same side, promoting local community welfare. I ask therefore for your patience as I question your detail.

1. I accept your green arrow downward 'trend', but understand that the results measured in Wheatley High St annual averages since 2006 have been against a ceiling of **40.0 NO₂mg/m**. **In your diagram you now state it against an apparent 50.0 threshold**. Put yourself in my place as an informed amateur. That is a goalpost change ! It is simply not on !

As part of the 'downward trend' the accepted 'unusual' year (2015) was explained officially to me by Ms Spendley last year as due to **'unusually stable weather conditions'**. **In the following year, 2016 it shot up again back** to 27.0 (26.8), approx. the same result as year 2006 (when it all started out due to concern for the A40 /M40 corridor and its impact on linear Wheatley alongside). Your green 'trend' arrow is therefore erratic, neither reflecting 2006 itself, nor the exceptional readjustment back to 2006 heights in 2016. Your 'well below threshold' is not the former 'high' of both OCC and SODC descriptions of results so far.

2. With respect, to tell me to get in touch with OCC Highways as the Old London Rd complaints are about traffic management right under the lee of the A40 embankment and air pollution fallout, is unacceptable. Residents complain about closing windows and use of gardens. About HGVs (diesel) regularly using the Waterperry Rd route via Old London rd. (I question the HGV depots official and unofficial which have sprung up along that road as far as Worminghall.) A nursing home stands at the end of the housing involved and the steep start of the canyon. Old London Rd is an ancient Saxon 'lane'. It is as low as possible, running by a major stream which is Wheatley and Shotover's sole tributary to the Thames. The A40 had to be raised/ embanked above it in 1970 (when built) creating the highest point embankment anywhere near the village, and immediately over housing.. (Elsewhere west and east the A40 runs through cuttings or open fields.

3. The London Road is a 'cut' made to create employment and better roads in 1925. It cut across the **Lye Field** (*Fallow/Clay/Barren field*). To the north the field sloped beyond that down towards the stream. My back garden of heavy clay is part of that considerable slope. It was named the **'Nether Lye Furlong'** in its medieval day, *Lower Fallow Field*. Between the 1925 London Rd 'cut' (now referred to in the SEA and WNP as an ' informal HGV village bypass', and the 1970 embanking of the A40 above the Old London Rd, a *de facto* **canyon has been created**. Neighbourhood Plans are meant above all to contribute local knowledge which might otherwise be lost or not make into official laptops.

Simon asked me this morning, what sort of response I seek. I would like to see Air Quality monitoring on the OLR equivalent at least if not better than the current tube testing on Wheatley High St. Evidence of concern has already been publicised on our website. What more can you ask ? We are about three months away from submission of our Neighbourhood Plan for Examination. Any member of SODC Environment Office would be welcomed to the village and after refreshment invited to walk the area which concerns us.

I look forward to your response and am glad that we have at least established some sort of contact.

Best wishes

Dear Mr Fox,

Thank you for your email and sorry for the delay in getting back to you.

I've amended the figure I sent you last week (please find below) hoping it will now be clearer, the threshold of 40.0 $\mu\text{g}/\text{m}^3$ NO₂ has not changed. The 50.0 $\mu\text{g}/\text{m}^3$ NO₂ was simply the scale of the graph.

As you mentioned, the concentrations in 2015 and 2016 were 23.8 and 26.8 $\mu\text{g}/\text{m}^3$ respectively, being lower than the limit stated by the legislation. District Council only has a duty to address and act on poor air quality when the Nitrogen Dioxide levels are close to or exceeding the annual mean level, which is not the case in Wheatley. We are not proposing or planning any further air quality monitoring in Wheatley as we have no grounds to justify this.

For the District Council to declare an Air Quality Management Area (AQMA) the levels of Nitrogen Dioxide would have to be above the 40.0 $\mu\text{g}/\text{m}^3$. Even under this designation, we wouldn't expect a drastic and immediate improvement: Henley's AQMA has been in place since 2002 and air quality in the area is still an issue nowadays due to the complexity of the topic.

On a broader note, the latest vehicle emission standards are showing real reductions in nitrogen dioxide levels, so I feel it is highly unlikely that Wheatley will exceed the annual mean for nitrogen dioxide in the future.

I understand your concern and would like to assure you that SODC is already working on reducing the emissions of pollutants, following the AQ Action Plan adopted in 2014 (https://oxfordshire.air-quality.info/documents/air_quality_action_plan.pdf).

One document that you might find useful for your Neighbourhood Plan is our Guidance for Developers (<http://www.southoxon.gov.uk/services-and-advice/environment-and-neighbourhood-issues/air-quality>). Feel free to use aspects of this in your plan.

Regarding my recommendation to raise the traffic issues with the County Council's Highways department, I'm afraid this would be the only viable route since traffic management is a County Council function; we are not trying to avoid the issue, but District Council has no powers whatsoever to manage traffic flows, HGV routes or any aspect of the highway and its use.

If you have any other questions or issues regarding AQ get in touch and I'll be happy to help you.

Kind regards,

Carmen Cubillas Martinez

Air Quality Officer

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Dear Ms Cubillas Martinez,

Thank you for fulsome and clear response to my concerns. Your letter helps considerably with seeing our way ahead on this matter.

I should add that the increasing national scandal of diesel engine tampering - culminating in Channel 4 Despatches last week on HGV engine 'hacking' - justifies the air quality concern of people in this A40 / M40 corridor justifiable, especially as with little remedy to hand. My view of our 24-32 mgm/m³ results since 2006 is that they still show that 60-80% of permitted toxic emissions (if not more) are contaminating our air here. The A40 streams traffic over the village and the Old London Rd 'canyon' 7 days and nights a week. The Centre of the village where present day measurement takes place has a 7.5 ton HGV limit and certainly at weekends and overnight has a fraction the traffic seen in the 5 weekdays. However that is an discussion for another arena.

Now that we have begun to make land use recommendations in our Draft Final Version of the N.P. engage with OCC, we have also begun to hear the views of OCC on traffic management implications in Wheatley particularly from the Strategic Site at Oxford Brookes University Wheatley/Holton site.

Thank you for your courtesy. No doubt I will soon be seeking from you the Air Quality results for Wheatley High Street 2017