

## Critical Comment on Draft Air Quality Action Plan for Ashbourne - as submitted to Defra by DDDC August 2022

The Description column is taken from a copy of the Draft Action Plan. It may not be exactly the same as the one sent to Defra since that has not been released. 'Effect in 5 years' is my assessment of likely impact on NOx levels at the current NOx hot spot at the top of Buxton hill. The comment is my justification for that opinion.

Action	Description	Effect in 5 years	Comment
1	<p><b>Continue to develop proposals for Ashbourne Relief Road</b> Derbyshire County Council Cabinet approved a preferred option for a Western Relief Road in 2021. This option has also been assessed as most likely to help resolve air quality issues by reducing the volume of traffic through the town centre (particularly northbound). The next steps are to prepare a planning application and commission the necessary supporting reports, and execute a preliminary scheme design. Following this there will be a land assembly phase and a design and construction phase.</p>	None	Highly desirable but its delivery is far from certain and in any case not within 5 years.
2	<p><b>Investigate the use of transport technology</b> Derbyshire County Council Urban Traffic Management Control system (UTMC) is due to be operational in Spring 2022 and could be used to link traffic signals within the town centre to manage traffic to provide a smoother flow of traffic around the town centre. This option could be supported by electronic information signs to provide advance information to drivers to reduce stopping and starting when travelling uphill; for example, when two heavy goods vehicles are approaching narrow road widths. An appraisal process as part of Action 2 and Action 3 will be undertaken to consider speed limits and weight limits on surrounding routes, to assist the effectiveness of the AQAP and will also consider Airfield Industrial Estate traffic routes.</p>	Negligible	<p>It is unclear how southbound A515 traffic would be regulated since there are no traffic lights between Buxton and Ashbourne. Similarly A515 northbound traffic has no control point until you reach Ashbourne. How and where would the HGVs be held / choose to wait as they wait for a passing place? How does that waiting reduce stopping and starting? Is there infrastructure already in place to provide the data for the UTMC system? Note this is NOT a proven mitigation but an intention to investigate a possible plan. The final sentence would appear to be an additional action.</p>

<p><b>3</b></p>	<p><b>Investigate town centre priority or capacity changes</b>  Suggestions by local stakeholders regarding potential to undertake priority changes at the A515 St John's Street/Buxton Road junction have been made and investigations to reduce queuing back towards the Market Place will be made. This option would also seek to consider whether a two-lane approach to Park Road could be created to provide unimpeded access for vehicles accessing both Cokayne Avenue and Park Road. A key consideration for the investigation will be to seek to maintain a safe and efficient operation of the A515 St John's Street/Park Road/Cokayne Avenue/Hall Lane junction. This option would also be considered in conjunction with Action 6 to maintain pedestrian safety and connectivity. A consultant is being commissioned to and details are expected imminently</p>	<p><b>None</b></p>	<p>The high NOx levels on Buxton Road are associated with <b>north</b> bound traffic (due to power required to climb the hill).  These measures will only affect the flow of southbound traffic.  Note this is NOT a proven mitigation but an intention to investigate a possible plan.</p>
<p><b>4</b></p>	<p><b>Pre-emptive travel advice</b>  Derbyshire County Council is currently developing in-car and roadside variable message sign capability for disseminating traffic advice to influence travel route choice when there are incidents on the road network or where congestion levels are increasing. This action is already being delivered as part of a wider implementation of pre-emptive travel advice, and development of a mobile phone application, across the County. There is potential to support better route selection along the A515 corridor.</p>	<p><b>None</b></p>	<p>At what point would the driver make the decision to avoid Ashbourne? If there are alternative routes that do not have high NOx levels why can they not be mandated for HGVs?  Such real time advice is of course currently available but does not appear to be influencing choice of route.</p>

<p><b>5</b></p>	<p><b>Investigate improved tree canopy pollution dispersal</b>  Trees and roadside vegetation is considered an important community asset which supports better air quality. Further investigation into the potential of the tree canopy on the northern section of Buxton Road intensifying the 'street canyon' effect by preventing adequate dispersal of pollutants. Both the County and District Council's Arboricultural Officers have advised that as many of the trees are protected a number of unprotected trees will be targeted initially and through ongoing attention to the current monitoring regime an understanding of the effectiveness of any tree pruning to aid pollutant dispersal can be considered.</p>	<p><b>Small/ negligible</b></p>	<p>Bearing in mind the location of significant tree canopy and the current NOx hot spots plus the fact that there does not appear to be a reduction in NOx during the winter when there are fewer leaves, suggests there may be no / limited benefit.  It will however improve the street scene if some of the dying ash trees and straggly yews are removed.</p>
<p><b>6</b></p>	<p><b>St John Street and Dig Street/Compton Public Realm</b>  Over half of all residents both live and work in the town and, therefore, there is good potential to encourage more people to walk to and from the town centre. Feedback from stakeholders has demonstrated the need for the redesign and widening of town centre footways to help create a safer and more attractive pedestrian environment and encourage more residents and visitors to walk around the town centre. Opportunities for green infrastructure could be included within scope. This project could be delivered in conjunction with making the Compton/ Dig Street one-way system permanent to further improve the pedestrian environment.</p>	<p><b>None / negligible</b></p>	<p>Only residents of Windmill Lane would choose to travel to the town by car using Buxton Road. So the reduction in vehicles on this road would be very small and the effect on number of HGVs (which are responsible for the bulk of the NOx) would be nil.</p>
<p><b>7</b></p>	<p><b>Investigate the demand for electric charging points</b>  A partnership between Derbyshire County Council, and Derbyshire DDC resulted in the installation of four dual fast charge points, funded by the Office of Zero Emission Vehicles On-Street Residential Charge Point scheme, in 2019. The County Council has commissioned a further study to assess further demand across Derbyshire and is considering the level of demand for additional charge points in Ashbourne.</p>	<p><b>None / negligible</b></p>	<p>More EVs would not affect the number of HGVs and these have been identified as the major source of NOx. Also the current charging points are under utilised so a greater incentive for EV purchase would appear to be needed.</p>

8	<p><b>Business and school travel planning</b></p> <p>The County Council's Sustainable Travel Team provides travel planning support to businesses and schools across Derbyshire and is committed to working with organisations in Ashbourne where there is demand.</p>	None / negligible	<p>Due to population distribution and locations of schools, Buxton Road is not a heavily used route for travel to school. Travel to work in cars from north of Ashbourne will account for only a small number of journeys.</p>
9	<p><b>Bus Service Improvement Plan implementation</b></p> <p>Ashbourne is currently served by one commercial service with connections to Uttoxeter and Derby. This is supplemented by subsidised services linking to Buxton, Leek, Belper, Wirksworth and Matlock. There is also the Ashbourne Derbyshire Connect demand responsive service for residents who are unable to access the conventional bus service routes. The Government's White Paper "Levelling Up" the United Kingdom' has stated that the County's ambitious Bus Service Improvement Plan is supported. Although the amount of funding associated with the Plan is yet to be announced, it is anticipated that several studies relating to delivery of integrated transport hubs, provision of low emission buses, and support for rural bus service improvements and expansion of demand responsive travel, would be undertaken and include Ashbourne and its surrounding rural areas.</p>	None	<p>Very few if any car journeys are likely to be replaced by the use of the current single bus service that serves communities north of Ashbourne with 7 trips a day. Its <b>loss</b> might cause a slight increase in car journeys.</p> <p>It would seem on this action as on others, the detail has not been updated since it was presented to DCC in February 2022. Since then it has been suggested that the government grant of £47 million is less than the £109 million over 5 years that was requested.</p>
10	<p><b>Continue engagement with local mineral and logistics companies</b></p> <p>Local stakeholders have made several suggestions which seek to constrain operation of heavy goods vehicles within the town. The Council has carefully considered these proposals and concluded that restrictions on travel are undeliverable, given the lack of alternative diversionary routes until such time that the relief road is delivered. In the interim, it is recommended that the Council continues to engage with local mineral and logistics companies to promote good practice and promote a wider understanding of air quality issues within Ashbourne town centre.</p>	None	<p>This seems not so much a plan as an admission of defeat on the one policy that could deliver a solution - banning HGVs (in at least one direction) from Buxton Road.</p> <p>Also without defining 'good practice' it is hard to evaluate what effect it would have.</p>

<b>11</b>	<b>Active Travel Promotion</b> The Council's Sustainable Travel Team undertakes promotion of active travel, such as distribution of the Derbyshire Cycle Map and working with schools. It is recommended that active travel promotion is undertaken to promote opportunities for reducing emissions within Ashbourne town centre and actively seek behavioural change and modal shift to walking and cycling. Project to consider opportunities for electric cycle charging and park and cycle ride.	<b>None</b>	I would hesitate to encourage anyone to cycle along the A515 in the region of Buxton Road. It is simply too dangerous due to the road width.
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