

# **Chideock Parish Council Consultation Feedback for Dorset Council's Draft Air Quality Action Plan.**

## **Chideock Parish Council Overview**

- Chideock Parish Council considers it unfortunate that none of the earlier feedback provided by the Council on this draft AQAP has been taken into account or even seriously considered.
- Why is the report dated April 2021, when it was not made available for public consultation until November 2021?
- The plan must comply with the Environmental Act 2021. It does not - please see Schedule 11 of the Act.
- This document reads as if it is a Dorset Council Policy document rather than the matter being seen as a Chideock specific issue-which, of course, factually it is, as an AQMA would not be required if were not for the fact that Chideock has been identified as a pollution hotspot.
- At the same time it is confusing in that Chideock's air pollution problems are referenced in detail yet most, if not all, of the "plan" "actions" relate to the whole Dorset Council area and are largely irrelevant to Chideock itself.
- A Chideock resident put forward to Dorset Council an Action plan which identified actions that could realistically be taken by Dorset Council, which could divert sufficient traffic away from Main Street, Chideock(between 55% and 69%) The Parish Council does not accept Dorset Council's position that there is very little that it can do that sits within their authority (see Environment Act 2021) This is seen as a dereliction of Dorset Council's duty as a Public Body, alongside other relevant partners, to strategically plan to support the residents of Chideock to enable them to live in a healthy and economically active environment. The Parish Council does not accept the principal espoused by National Highways that the purpose of the strategic highway is to keep traffic moving through Chideock irrespective of the cost of the health of Chideock's citizens and visitors, both adults and children.
- The plan is based on inaccurate data over a lengthy period of time and needs to be re-evaluated against accurate data and its interpretation - currently on the basis of the figures presented in this plan the pollution levels appear to be lower than they actually are when the correct data is used. See comments for section 2. Summary of Current Air quality.
- Specific inputs, outputs and outcomes have not been identified within this plan which could or would address the issues of pollution within Chideock, both in the short term and the long term.
- This amended plan has been outstanding since 2011, when the previous plan was last updated, and the history of stakeholder engagement has been poor since then with lip service being paid to the concerns that the village has about the levels of pollution.

- There is no acknowledgement of the impact of previous and current planning decisions upon the level of pollution in this village due to the increase of traffic on the A35. This includes the current Foundry Lea (Verse Farm) development in Symondsburry Parish.
- There is no acknowledgement of the impact of the lack of a Dorset Council / National Highways strategy which considers the lack of a suitable East-West Road connection, which means that high levels of construction traffic, HGVs, and tourist traffic pass through Chideock on a daily basis leading to increased levels of pollution.

#### Executive Summary.

- It needs to be made clear that the previous Chideock AQAP has not been updated or reviewed since 2011.
- The correlation between less affluent areas and Chideock is inappropriate. Chideock is not a “less affluent” area. This example ignores the fact that the issue for Chideock is specifically topography and the high level of traffic and congestion. The village sits in a deep valley, vehicles of all types struggle to ascend the hills in both directions and brakes are applied at the last minute when descending. Currently there is little or no enforcement by the police on speed.
- “Our priorities are to ensure that the Council, in collaboration with others, work in pursuit of the achievement of the air quality objectives in Chideock, and also to reduce emissions more generally across the district.....”. This comment must be amended – presumably, it is a carry-over from the previous WDDC reports as it references “district” rather than “the Dorset Council area”.
- Chideock Parish Council agrees that Chideock presents a complex problem but it is not one that is going away soon. The levels of pollution have been increasing in severity over the last twenty years and will not go away with the arrival of electric cars. There are solutions, both short term and long term. So far, Chideock Parish Council is of the opinion that Dorset Council is not very committed to resolving Chideock's pollution.
- The current proposed 30-mile an hour speed limit on Chideock Hill to the west is meaningless without enforcement. Even with enforcement, the issue of exposure to tyre dust (PM2.5) from heavily laden HGVs and tourist traffic applying their brakes coming down Chideock Hill will continue to exist. The whole issue of speed controls has been mismanaged by National Highways, who make it clear that its role is to keep the traffic moving and not to consider the health of the citizens of Chideock.
- Dorset Council states that there has been ongoing consultation with Chideock Parish Council, one of its Prime Stakeholders but this is incorrect. Over the last three years, apart from the correspondence that the Chideock Parish Council have sent to Dorset Council asking for an updated AQMA, there has been no uninitiated response or conversation.
- Five broad topics to reduce NO2 and PM2.5 .

No direct measures are suggested in the plan.

#### 1. Occupancy.

Currently a significant number of the properties within Chideock are second homes / holiday lets / used as Airbnb rentals.

During the holiday period, from late March to November, there are many additional cars in the village. Van and truck drivers are usually single driver as it is their job and have no reason to take passengers.

In addition, the West Dorset Leisure Holiday Golden Cap holiday resort at Seatown and the beach at Seatown introduce a significant increase in the number of vehicles and vehicle movements per week during the holiday periods - the only access to Seatown is from Chideock Main Street.

## 2. Alternative fuels

Alternative fuels will not be fully utilised until at least 2050 and in the short term will have very little effect upon levels of pollution. National Highways has stated that only 27% of HGVs are Euro 6 compliant and it is likely that this also applies to much of the holiday traffic that flows through Chideock on a daily basis.

Other environmental measures - the evidence is that, although the Environment Act 2021 is now in force, further restrictions on the types of domestic fuel which can be used will not happen for another 15 years and alternatives continue to be sought. Gas Boiler changes will not happen for another 15 years and alternatives continue to be sought.

## 3. Transport Plan.

The needs of Chideock have not been considered in any strategic transport plan covering the South West of England, or at a national level. The current LEP / Western Gateway discussion appears to be based on the presumption that the A35 provides a safe and effective strategic corridor - which it does not.

In the first Department of Transport Road Investment Strategy (RIS1) Chideock was described as a pinch point and yet, when Dorset Council responded to the RIS2 consultation, even though Chideock had raised its very serious concerns about pollution and the impact on the village, no issues were raised about this or about what would need to happen to deliver a different route, both from an economic perspective (let's face it, congestion costs the economy money) and from a health and safety perspective due to the levels of pollutants which are the sole reason that Chideock is an AQMA.

## 4. Partnership working. There is no evidence that any of the major stakeholders have taken seriously the impact of the increased levels of traffic upon the health and emotional well-being of the residents of Chideock.

In fact, this draft plan seeks to minimise the impact of Chideock's AQMA status by making it applicable to the whole of Dorset, which is meaningless.

## 5. Other forms of Transport.

Chideock is poorly served by public transport.

West Dorset has not benefited from the availability of financial resources and grant funding for public transport, which has been spent in other areas of Dorset, particularly East Dorset.

The A35 does not provide a direct walking route to Bridport and cyclists take their lives in to their own hands, especially on Quarr Hill to the east of Chideock. Therefore, the solutions proposed feel a world away when offered as a possibility.

## 2. Summary of Current Air quality.

- The law states that Local Authorities must develop an Air Quality Action Plan with local measures to tackle air pollution. The Environmental Act 2021 goes further see Schedule 11 of the Act

This document fails to do this, it is not SMART (Specific, Measurable, Achievable, Relevant, Time bound) and it is not outcome based.

### • 2.1. Air Quality data.

- Chideock Parish Council raises significant concerns about the accuracy of the data being provided and used by Dorset Council.
- Chideock Parish Council has doubts about the accuracy of the Bias factors applied to Chideock, Bridport and Dorchester; they are not consistent. If they are national figures from DEFRA, can you please provide documentation from DEFRA verifying their accuracy, since the diffusion technology used has accuracy of + or - 20%.
- Chideock Parish Council requests that the bias factor used for each year is added to Tables 1 and 2, together with the origin – Local or National (i.e. supplied by DEFRA). An Automatic Analyser was installed in 2009 to enable provision of a “local” bias factor. This ceased working in 2017, and a local bias factor was only used for three years between 2009 and 2017.
- Chideock Parish Council points out that the Automatic Analyser (AA) was not correctly located as per DEFRA guidelines. The topography, physical space required, and the need for connection to an electricity supply were the reasons given by West Dorset District Council for this incorrect positioning. As this machine could not give accurate base data for Chideock, the data should not have been used.
- An audit of all the pollution data published was conducted on behalf of Chideock Parish Council to establish how accurate the data was. This was undertaken in light of the 2017 data which proved to be incorrect. Three scenarios for 2017 were offered to Dorset Council which accepted the lowest. This was sent to DEFRA as an amendment and was accepted. In addition the audit found that a number of similar events had taken place over the years since data was recorded. This was either mixing up the tube identification or purely an inconsistent reading which should have been voided. The Audit had been reserved and not published, on the basis that the WDDC Environment department responsible for monitoring was under resourced and had been for some time. Proper

checks had not been conducted to identify “rogue” data. This was historical and publication served no real purpose.

- Chideock Parish Council has compared the bias factors applied for Chideock year by year from 2005 to 2017 (until the Automatic Analyser died) and compared these to the Bias factors applied to Dorchester High East Street 713 and 714. It shows that Dorchester was allocated 0.98 for 2014 yet Chideock 0.93. Similarly, 2017 Dorchester 0.96 but Chideock 0.88. In 2013 and 2016 both were 1.01. These are big differences as the factors for both areas are supposed to be based on a national bias. Given the evidence provided, it would be helpful for Dorset Council to explain their interpretation and the impact that this has subsequently had.”
- Chideock Parish Council notes that all Dorset Council pollution data is rounded down to one decimal place instead of using the normal rounding up. This is important when averaging and making adjustments for bias.
- Chideock Parish Council asks why no completed average data and bias factor are shown on the Dorset Council website for Dorchester for 2017 ,2018, 2019 and for Chideock for 2018 and 2019. Yet from Table 1 of the Draft Plan it appears that Dorset Council is using a, presumably, biased average for 2018 and 2019 (2019 has not yet been sent to and approved by DEFRA).
- As noted in the footnote to Table 1, the data for 2020 should not be considered as statistically relevant for the purposes of the AQAP given the impact of COVID on traffic.

Given the importance of this statement, the Parish Council requests that it be inserted into the Summary section of the plan.

### 3.2 Source apportionment

- NO2 data issued by Dorset Council for 2017 including Table 3 does not include Chideock Cottage N14.

Figure 1 shows NO2 Modelling from East of Duck Street, opposite the Old Castle Inn and Arundell With between 40 and exceeding 80 Microns/cubic metre of air in 2017.

Yet diffusion tubes monitoring has never been conducted in these positions and shows that there is a high degree of pollution, mainly on the south side of the A35 as vehicles ascend the gradients from Chideock bridge going West.

Why has this not been measured and why has Chideock Parish Council not received this information before?

Is there any other relevant information Dorset Council needs to share.?

- The Pandemic has shown that 69% of traffic need to be removed to get all positions below the Legal limit and the data for 2020 confirms that.
  - Dorset Council gives the subjective opinion that only a handful of houses are affected - 25 out of 64 which is 39%, hardly insignificant.

- Chideock Parish Council challenges this assertion - pollution levels experienced from traffic of all types affect not just Main Street but all those homes that sit behind Main Street, which are affected by tyre dust pollution (PM2.5, PM<1 and PM10), noise and vibration. This statement by Dorset Council is highly disrespectful and the Parish Council suggests that Officers and Councillors need to visit and see for themselves what it feels like on a busy day in Chideock in the middle of the summer period when you cannot even cross the road!
- Chideock Parish Council strongly disagrees with, and takes exception to, the proposal that pollution reduction across Dorset will have an effect on Chideock. In fact it is the opposite, for two reasons. Firstly, there is currently no alternative solution being put forward to divert traffic away from Chideock which means that the A35 will remain the strategic East-West route. Secondly, the prevailing winds come from the South West, therefore all forms of pollution that travel into / are produced in the village are blown across Dorset and not away from it.
- Recently received data shows that traffic move particulates up and down the A35 in Chideock showing they stay around longer.
- Chideock Parish Council disagrees that the current WHO limit for PM2.5 is being met in most parts of the UK. The data for particulate matter is primarily based on mapping / modelling as most areas including London do not fully test for PM10 or 2.5. In Dorset only a handful of locations are monitored. The 25 Micrograms per cubic metre of air is only one of a range of four issued by WHO. The lowest of these is 10, which is the target for the UK to meet by 2030.

### 3.1 Public Health Context

- Chideock Parish Council has significant knowledge, based on research, of the impact that PM2.5, PM<1, PM10 have on the health of human beings. Why, given the levels of pollution due to traffic through Chideock, has Dorset Public Health not seen this issue as a matter of concern for the health of the individuals who live in this village? Why is it not measured in Chideock? Why are Dorset Council and the Director of Public Health Dorset not taking responsibility and issuing guidance for Chideock Residents and their Visitors.
- Public Health Dorset has not conducted an outcomes-based study of the impact of pollution on the health of Chideock Residents or into deaths that have occurred. DEFRA has a "Pollution in your Area today website" but every time a member of Chideock Parish Council or Chideock Resident has typed in Chideock they get a pollution free ticket. This is because DEFRA compiles the data via mapping and does not use any real-time pollution data. The Director of Health for Dorset actually suggested that Residents of Dorset use it! The data shown in Public Health risk site noted on page 8 is derisory. A Senior expert from London University recorded PM2.5 at 144UG/M3 in 2019 in

Chideock. Given that Dorset Council is only measuring particulates at a few sites in Dorset, Chideock Parish Council is astounded that Public Health Dorset should publish and use such figures which are by far exceeded in Chideock.

### 3.2 Planning and Policy Context.

#### 3.2.1 and 3.2.2.

- Chideock Parish Council has repeatedly raised the issues around the A35 and the fact that it is not fit for purpose both with the Western Gateway Sub-National Transport Body, National Highways, the MP for West Dorset, Chideock's Dorset Ward Councillor, with little or no success.
- Chideock Parish Council submitted a consultation response to the Western Gateway Sub-National Transport Body Consultation on the Sub-National Transport Strategy, and has unsuccessfully attempted to enter into dialogue with this body.
- Chideock Parish Council contributed in detail to the second Road Infrastructure Strategy (RIS2) consultation, only to see Chideock removed as pinch point on the A35 even though nothing had changed in the intervening period of time since RIS1. Chideock Parish Council based its contribution on the need to have short term measures to address health and safety issues such as the lack of pavements, safe pedestrian crossing points, and speed control, with a recognition that the only way to achieve traffic diversion was through the creation of an alternative route around Chideock. Dorset Council's position however was to consider south - north routes out of Southampton, but this completely fails to acknowledge that haulage traffic travels from East to West across the A27 / M27 / M3 / A31 / A35 / A30 from Dover, from Southampton, from Portsmouth to Plymouth. Holiday traffic flows from London down the M3, to East Devon and Cornwall. None of this traffic brings any economic benefit to West Dorset - they are passing through and leaving their pollution on our doorsteps.

#### 3.2.3.

- The Dorset Local Transport plan is totally ineffective, with measures that do not address the lack of public transport, footpaths, and cycleways. These are big policy statements that have no teeth as far as Chideock is concerned. For example, the Foundry Lea (Verse Farm) development at Bridport will potentially add another 1700 cars to the A35, plus the traffic to service the development itself. For Chideock, the environmental impact will be huge - how are Dorset Council going to stop these vehicles flowing through Chideock?
- Dorset Council and National Highways need to recognise that an alternative route is required to take these additional cars and construction traffic away from the A35. Current conversations about cycle routes fail to address the issue.

The actions are not SMART (Specific, Measurable, Achievable, Relevant, Time bound) and they are not outcome based, which renders them not fit for purpose.

Action 1 . National Highways. What are these direct measures?

Action 2. Dorset County Council.

This shows a complete lack of understanding of the reality of living in a village in rural Dorset. Limited bus service; no trains; only cars and taxis. Too dangerous to walk or cycle. None of the funding that is mentioned in this document has come to rural West Dorset, yet alone to Chideock. West Dorset has had no infrastructure improvements. All or most funding has gone to the East of the County.

Action 3 . Promote the use of Alternatively Fuelled Vehicles

Alternative fuels are not a viable consideration and this action does not deal with the impact of tyres , brake dust and congestion. In this area of Dorset you will see many E,T,S registrations along with 01 and 02, most popular 06 (15 years old). There is no point in electric car chargers if people can't afford electric cars. Finally, the development of electric cars and vans will only really take off when the new generation of batteries is developed at what price? However, it would be helpful if Dorset Council could insist that all of their contracts with public transport providers including buses were using electric or Hydrogen by 2023.

Action 4. Develop Policies to Support Better Air Quality

Dorset Council appears to be unable to identify what policies exist and what they do. Basically, a lot of words adding up to not a lot..

Action 5. Control Domestic Emissions – Smoke from Fires.

This is the only action which Chideock Parish Council can agree with. However, these measures will not be incorporated until the Environment Act 2021 is validated by the Minister of State and Statutory Instruments are made. The only problem for Chideock is that it only applies in the Months from October to April, when the traffic pollution is at its lowest and most NO2 data is almost legal. As Dorset Council will know, domestic emissions add up to 10Ug/M3, increasing the background pollution to around 20UG/M3.

So, although welcome does not solve the pollution which comes from the volume of traffic.

#### 4 Development and Implementation of Dorset Council AQAP

##### 4.1 Consultation and Stakeholder Engagement.

Dorset Council states that “There is ongoing engagement with Highways England, the Parish Council and with the local MP.”

Over the last three years, apart from the correspondence that the Chideock Parish Council has sent to Dorset Council asking for progress on an updated AQMA and outstanding ASR reports to DEFRA, and Dorset Council's request in May 2021 that the Parish Council review this plan prior to full consultation, there has been no uninitiated response or conversation.

### 5.AQAP measures

HGVs and other vehicles are unlikely to use the A37 / A303 route, which is 25 miles longer, with many 50 mph restrictions, and much is single carriageway with very little dual carriageway, which means that average speeds are low and congestion occurs.

Hauliers choose the most economic all year-round route.

No work has been done to prevent congestion at the A35 / Duck Street / North Road junction. This causes more pollution than a bus stopping for one minute.