

Agenda

7.00 pm

Wednesday, 26 October 2022

The Council Chamber, Millmead House, Millmead,
Guildford, Surrey GU2 4BE

A link to view the live and recorded webcast of the remote meeting will be available on the [Guildford Joint Committee](#) page on the council's website.



Discussion

- **Guildford Air Quality Action Plan**
- **Parking & Air Quality working group**

You can get involved in the following ways

Ask a question

If there is something you wish to know about how your council works or what it is doing in your area, you can ask the joint committee a question about it.

Write a question

You can also put your question to the local committee in writing. The Partnership Committee Officer must receive it a minimum of four working days in advance of the meeting.

Before submitting your question we would encourage you to use the report it function on the [SCC website](#) to get a quicker response to your issue whenever possible.

We will, where possible, endeavour to provide a written response to your question in advance of the meeting.

When you arrive at the meeting let the committee officer (detailed below) know that you are there for the answer to your question. The committee chairman will decide exactly when your answer will be given and may invite you to ask a further question, if needed, at an appropriate time in the meeting.

This will enable you to listen to the Written Questions item and to then ask a further question based on the response provided if you wish, when invited to do so by the Chairman.

Sign a petition

If you live, work or study in Surrey and have a local issue of concern, you can petition the local committee and ask it to consider taking action on your behalf. Petitions should have at least 30 signatures and should be submitted to the Partnership Committee Officer two weeks before the meeting. You will be asked if you wish to outline your key concerns to the committee and will be given three minutes to address the meeting. Your petition may either be discussed at the meeting or alternatively, at the following meeting.

Attending the Local Committee meeting

Your Partnership Committee Officer is here to help.

Email: gregory.yeoman@surreycc.gov.uk

Tel: 07968 832 390 (text or phone)

Website: <https://www.surreycc.gov.uk/people-and-community/your-local-area>

This is a meeting in public.

Please contact **Gregory Yeoman** using the above contact details:

- If you would like a copy of this agenda or the attached papers in another format, e.g. large print, Braille, or another language.
- If you would like to attend and you have any additional needs, e.g. access or hearing loop
- If you would like to talk about something in today's meeting or have a local initiative or concern.

Committee members 2022/23

Co. Cllr. Colin Cross
Co. Cllr. Fiona Davidson
Bo. Cllr. Graham Eyre
Co. Cllr. Matt Furniss
Co. Cllr. Angela Goodwin
Bo. Cllr. David Goodwin
Bo. Cllr. Jan Harwood
Co. Cllr. Robert Hughes
Co. Cllr. Julia McShane
Co. Cllr. Carla Morson
Bo. Cllr. Ramsey Nagaty
Co. Cllr. George Potter
Bo. Cllr. John Rigg
Bo. Cllr. Tony Rooth
Bo. Cllr. Deborah Seabrook
Bo. Cllr. Paul Spooner
Bo. Cllr. James Steel
Bo. Cllr. Cait Taylor
Co. Cllr. Fiona White
Co. Cllr. Keith Witham

Joint Chief Executive of Guildford and
Waverley Borough Councils
Tom Horwood

Surrey County Council Chief Executive
Joanna Killian

MOBILE TECHNOLOGY AND FILMING – ACCEPTABLE USE

Those attending for the purpose of reporting on the meeting may use social media or mobile devices in silent mode to send electronic messages about the progress of the

public parts of the meeting. **To support this, wifi is available for visitors – please ask for details.**

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Thank you for your co-operation

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Generally the public seating areas are not filmed. However by entering the meeting room and using the public seating area, you are consenting to being filmed and to the possible use of those images and sound recordings for webcasting and/or training purposes.

If you have any queries regarding this, please contact the representative of the Community Partnerships Team at the meeting.

1 APOLOGIES FOR ABSENCE

To receive any apologies for absence from members under Standing Order 39.

2 MINUTES FROM PREVIOUS MEETING

(Pages 7 - 10)

To approve the Minutes of the previous meeting as a correct record.

3 DECLARATIONS OF INTEREST

All Members present are required to declare, at this point in the meeting or as soon as possible thereafter

- (i) Any disclosable pecuniary interests and / or
- (ii) Other interests arising under the Code of Conduct in respect of any item(s) of business being considered at this meeting

NOTES:

- Members are reminded that they must not participate in any item where they have a disclosable pecuniary interest
- As well as an interest of the Member, this includes any interest, of which the Member is aware, that relates to the Member's spouse or civil partner (or any person with whom the Member is living as a spouse or civil partner)
- Members with a significant personal interest may participate in the discussion and vote on that matter unless that interest could be

reasonably regarded as prejudicial

4 PETITIONS

To receive any petitions in accordance with Standing Order 14.1. An officer response will be provided to each petition.

5 MEMBER WRITTEN QUESTIONS

To receive any written questions from Members under Standing Order 13.

6 PUBLIC WRITTEN QUESTIONS

To receive any questions from Surrey County Council electors within the area in accordance with Standing Order 14.2.

7 DECISION TRACKER [FOR INFORMATION]

(Pages 11 - 14)

This report updates the committee on the progress of decisions that have been made at previous meetings.

8 GUILDFORD TOWN CENTRE AIR QUALITY ACTION PLAN - POST CONSULTATION (EXECUTIVE FUNCTION - FOR DECISION)

(Pages 15 - 114)

The report seeks approval to submit the revised AQAP for Guildford Town Centre to the Department of the Environment and Rural Affairs (Defra).

9 PARKING AND AIR QUALITY WORKING GROUP UPDATE (FOR DECISION)

10 FORWARD PLAN (FOR INFORMATION)

(Pages 115 - 116)

Committee members are asked to note the contents of the forward plan and suggest any items that they would like to be considered for future meetings.

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Minutes of the meeting of the
Guildford JOINT COMMITTEE
 held at 7.00 pm on 29 June 2022
 at Council Chamber, Guildford Borough Council, Millmead House, Millmead,
 Guildford GU2 4BB.

These minutes are subject to confirmation by the Committee at its next meeting.

Committee Members:

<p>* Co. Cllr. Fiona White (Chairman) Bo. Cllr. David Goodwin (Vice-Chairman) Co. Cllr. Colin Cross * Co. Cllr. Fiona Davidson Co. Cllr. Matt Furniss Co. Cllr. Angela Goodwin Bo. Cllr Jan Harwood * Co. Cllr. Robert Hughes Bo. Cllr. Steven Lee * Co. Cllr. Julia McShane * Co. Cllr. Carla Morson * Bo. Cllr. Ramsey Nagaty * Co. Cllr. George Potter Bo. Cllr John Rigg Bo. Cllr Tony Rooth * Bo. Cllr. Deborah Seabrook * Bo. Cllr Paul Spooner Bo. Cllr. James Steel * Bo. Cllr. Cait Taylor Co. Cllr. Keith Witham</p>

* In attendance

1/22 APOLOGIES FOR ABSENCE [Item 1]

Apologies were received from Cllr Furniss, Cllr Lee, Cllr Rigg, Cllr Steel, Cllr Rooth and Cllr Witham. Cllr A Goodwin and Cllr D Goodwin attended virtually.

2/22 MINUTES FROM PREVIOUS MEETING [Item 2]

The minutes of the meeting held on 16 March 2022 were agreed.

3/22 DECLARATIONS OF INTEREST [Item 3]

There were no declarations of interest.

4/22 PETITIONS [Item 4]

No petitions were received.

5/22 MEMBER WRITTEN QUESTIONS [Item 5]

No questions were received.

6/22 PUBLIC WRITTEN QUESTIONS [Item 6]

No questions were received.

7/22 DECISION TRACKER [FOR INFORMATION] [Item 7]

The Chairman asked the Committee Officer to follow up Item 14 on the Decision Tracker to see what the timeline was for the discussions on reviewing parking permits for carers.

The decision tracker was noted.

8/22 GUILDFORD TOWN CENTRE AIR QUALITY MANAGEMENT AREA - ACTION PLAN (EXECUTIVE FUNCTION FOR DECISION) [Item 8]

Declarations of Interest: None

Officers attending: Gary Durrant, Senior Specialist – Environmental Protection, Environment and Regulatory Services, Guildford Borough Council; Justine Fuller, Head of Environment and Regulatory Services, Guildford Borough Council

Petitions, Public Questions, Statements: None

Member Discussion – key points:

The Chairman thanked the officers for their detailed report. Mr Durrant provided some context: Formal declaration of the Air Quality Management Area was made to DEFRA on 21st October 2021. 30 measures were identified to help reduce the exceedance, with five key ones that it was felt would provide the most significant improvement in air quality identified in the report. This would be the first time many have been implemented in Surrey, therefore it would be difficult to predict accurately the level of their impact. Borough officers from Environmental Health, Transport, Parking and Planning along with county council officers had worked closely in considering the implications of the AQMA and how to tackle it; improving the air quality in the area will have significant Public Health implications.

Points raised during the discussion included:

- The length of the consultation
- The possibility of traffic displacement
- The extent of proposed 20mph zones in Holy Trinity ward and Onslow
- Enforcement of HGV bans
- The need to coordinate work and discuss prioritisation with SCC to tie in with EV charging projects and the Local Cycling and Walking Infrastructure Plan
- The contribution of Park & Ride to the plan
- Addressing anti-idling near the railway station and Waitrose
- Potential funding for implementation

Officers agreed to review the consultation period, bearing in mind the deadline in the autumn for preparing the follow-up report, when the results of the consultation would be presented to this committee. Reassurance was

given that the consultation was fully prepared and ready to launch on 1st July; the borough's Communications team would be helping to promote it.

Following the consultation process the chosen measures would then need to have a feasibility assessment. It is likely that a combination of measures would be the most effective approach. Because the exceedance had been identified as traffic related, some of the measures would sit within the county council's remit to implement.

The 20mph zone boundaries were indicative at the moment and could be adjusted following the collection of evidence to indicate possible traffic displacement. Officers undertook to circulate the results of traffic monitoring in Holy Trinity ward along with a link to modelling results from 2019.

There is a parking app in use already, to help people find the most suitable parking place and avoid driving around trying to find one. It would be reviewed for ease of use and effectiveness, and promoted to make sure the take up of it is as wide as possible.

The Chairman emphasised that the October meeting of this committee would be its last scheduled meeting. The AQAP was due to return to the committee at that point, so it was important for the consultation to have concluded successfully in time for officers to prepare their report so that it can be reported locally.

Note: Following this meeting, officers extended the consultation period, which will now run from 1600h on Friday 1st July to 2400h on Wednesday 3rd August.

Resolved:

The Joint Committee (Guildford):

- (i) Approved a 4-week public consultation on the Air Quality Action Plan for Guildford Air Quality Management Area shown in Appendix 2.
- (ii) Noted that the results of the public consultation and any consequent amendments will be presented to the 26 October 2022 Joint Committee and if approved will be sent to the Department for Environment, Food and Rural Affairs (Defra) for final approval.

Reasons for Recommendations:

To ensure the Council meets its statutory duties to adopt an Air Quality Action Plan to improve air quality within the AQMA in Guildford Town Centre.

9/22 MEMBERSHIP OF PARKING AND AIR QUALITY WORKING GROUP (FOR DECISION) [Item 9]

Declarations of Interest: None

Officer attending: Gregory Yeoman, Partnership Committee Officer

Petitions, Public Questions, Statements: None

Member Discussion – key points:

The Chairman explained that with the Joint Committee no longer handling parking and highways, the terms of reference for the working group needed revising. There were also two spaces available on the group for membership from among the Guildford Borough Council members Cllr Seabrook put herself forward and was accepted. In the absence of a second volunteer the Chairman asked local Group leaders to canvass their members for a nomination. She stressed the importance of the working group, particularly in light of the Town Centre Air Quality discussion in the earlier item.

Resolved:

The Joint Committee (Guildford) agreed:

- (i) The revised terms of reference of the Parking & Air Quality working group
- (ii) The membership of the Parking & Air Quality working group, as detailed at paragraphs 2.1 to 2.8, **with the addition of Cllr Seabrook.**

Reasons for Recommendations:

Good governance practice requires that the Committee reviews membership arrangements regularly to ensure that representation on the committee, working groups and partnerships is fair and provides the best outcomes for the interests of Guildford borough residents.

10/22 FORWARD PLAN (FOR INFORMATION) [Item 10]

Declarations of Interest: None

Officer attending: Gregory Yeoman, Partnership Committee Officer

Petitions, Public Questions, Statements: None

Member Discussion – key points:

The A25 bus lane item was removed from the forward plan. There was enthusiasm for a discussion on the Park & Ride provision and it was agreed that this should be covered in an informal meeting to be arranged by the officer.

The forward plan was noted.

11/22 DATE OF NEXT MEETING [Item 11]

26 October 2022.

Meeting ended at: 8.07 pm

Chairman

Guildford Joint Committee Decision and Action Tracker

This tracker monitors progress against the decisions and actions that the Joint Committee has made. It is updated before each committee meeting. (This version presented to committee 26 October 2022).

- Decisions and actions will be marked as **‘open’**, where work to implement the decision is ongoing by the Joint Committee.
- When decisions are reported to the committee as **‘complete’**, they will also be marked as **‘closed’**. The Committee will then be asked to agree to remove these items from the tracker. For some decisions the Committee and public will be able to monitor the progress through Surrey County Council website. A link to the webpage will be included on the item when marked as complete.
- Decisions may also be **‘closed’** if further progress is not possible at this time, even though the action is not yet complete. An explanation will be included in the comment section. In this case, the action can remain on the tracker should the Committee request.

Ref number	Meeting Date	Decision	Status (Open/ Closed)	Officer	Comment or update
1	13 June 2018	<p>The Guildford-Godalming Greenway route is adopted into the Guildford Cycle Plan.</p> <p>https://www.surreycc.gov.uk/roads-and-transport/roadworks-and-maintenance/maintenance/roads/department-for-transport-capital-funding/roads-and-pavements</p>	Open	Transport Policy Team Mngr, SCC	<p>17/10/22 - The feasibility study and public consultation has been completed. The public consultation report is available to view on the consultation website: Guildford to Godalming Greenway consultation report - May 2022.pdf</p> <p>The project team submitted a bid to National Highways Designated Funds for further funding to advance the project. A funding agreement is being agreed with National Highways to fund the detailed design stage. Subject to the agreement being confirmed, this stage of work will include finalising the scheme's scope, completing detailed design</p>

					drawings for the scheme and progressing the consents required to construct the scheme.
2	03 July 2019	Supported the County Council and Guildford Borough Council entering into a formal agreement for the future maintenance and operation of Chapel Street, Swan Lane, Castle Street, High Street and Tunsgate.	Closed	Interim Major Projects Consulting Manager, GBC	29/3/22 – Cllr Rigg provided clarification on GBC position to Cllr White cc members, saying they would not enter into an agreement. Recommend remove from list
3	11 Dec 2019	<p>ii. Authorised advertisement of all necessary statutory notices to implement the new A3100 London Road pedestrian and cycle route with any representations reviewed by the Area Highway Manager and Transport Strategy Project Manager, in consultation with the Chairman, Vice Chairman and relevant Divisional Member(s) (paragraph 2.15 refers).</p> <p>iii. Authorised advertisement of all necessary statutory notices to implement the new Guildford College Link+ cycle route with any representations reviewed by the Area Highway Manager and Transport Strategy Project Manager, in consultation with the Chairman, Vice Chairman and relevant Divisional Member(s) (paragraph 2.22 refers). (Subject to engagement with local bus operators and a satisfactory outcome being agreed with Guildford Borough Council Parking Services).</p> <p>https://www.surreycc.gov.uk/roads-and-transport/policies-plans-consultations/major-transport-projects/guildford</p>	Open Open	Principal Project Manager, SCC	<p>7/2/22 - The scheme is being redesigned as part of the wider Guildford to Burpham cycle scheme. 14/10/22 – no progress to report</p> <p>7/2/22 - TRO is in place. Woodbridge road to Guildford college is complete. Walnut Bridge to Woodbridge Road awaiting Secretary of State approval of cycle track order. 14/10/22 – no progress to report</p>
4	17 March 2021	To advertise and introduce proposed parking restrictions in the 35 sites prioritised by the P&AQWG and scoring 20 points or more.	Open	Parking Services Manager, GBC	<p>7/6/22 – Delayed due to SCC's desire to add a number of 'last-minute' requests to the review, EVCP and their programme to increase permit prices. Now anticipated Summer / Autumn 2022.</p> <p>17/10/22 - No longer a GJC function and responsibility to undertake this work to transfer to SCC in Spring 2023. Still ongoing.</p>

5	17 March 2021	Reappraise the methodology associated with parking reviews in preparation for the next review with a view to improving the transparency of the process.	Open	Parking Services Manager, GBC	17/10/22 - No longer a GJC function and responsibility to undertake this work to transfer to SCC in Spring 2023. Still ongoing.
6	17 March 2021	Petition on the junction of Guildown Road and Portsmouth Road – progress report following post-committee meeting between divisional member and Traffic Engineer.	Open	Area Highway Manager	21/9/21 - A new VAS has been put up near the junction. There is a request on the list for anti-skid on Portsmouth Road. No further update.
7	21 Oct 2021	Reduce speed limits on Pirbright Bends and install average speed cameras. ROAD SAFETY POLICY Ann A Local Speed Limits.pdf (surreycc.gov.uk)	Open	Road Safety & Sustainable School Travel Team Manager	13/10/22 - The bend signs have been installed, and the new speed limit is due to be installed shortly. The average speed cameras have been implemented.
8	16 March 2022	Discuss a review of admin process for application for a carer's parking permit with GBC and SCC officers.	Open	GBC Parking Lead	7/6/22. Yet to commence. Changing the permit from an annual one, to one primarily linked to the anticipated duration of the need for care, would require changes to the TRO. 17/10/22 - No longer a GJC function and responsibility to undertake this work to transfer to SCC in Spring 2023. Still ongoing. PCO awaiting update from SCC Parking team.
9	16 March 2022	Implement new lower speed limits on rural roads as agreed at the meeting on 16 March.	Open	Road Safety and Sustainable School Travel Team manager	13/10/22 - The first of the new speed limits have been advertised, and subject to consideration of objections will be installed in the coming months.
10	16 March 2022	Implement the new on-street parking tariffs in the 2-hour and 3-hour max. stay pay and display and pay and display dual-use spaces, and extend the maximum period of stay to one hour in the current 30-minute bays.	Closed	GBC Parking Lead	Implemented summer 2022. Recommend remove from list
11	29 June 2022	Carry out public consultation on the Guildford Town Centre Air Quality Management Area action plan	Closed	Senior Specialist – Environmental Protection	See Item 8 of the JC agenda for 26/10/22 Recommend remove from list
12	29 June 2022	Circulate information on air monitoring and link to 2019 modelling for Holy Trinity	Closed	Senior Specialist – Environmental Protection	Information circulated to JC members 13/10/22 Recommend remove from list

13	29 June 2022	Group Leaders to canvas members for the final vacant borough place on the Parking & Air Quality working group	Closed	Partnership Committee Officer	Leaders asked for nominations by 20/10/22. Recommend remove from list
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**GUILDFORD BOROUGH COUNCIL AND
SURREY COUNTY COUNCIL**



**GUILDFORD
BOROUGH**

GUILDFORD JOINT COMMITTEE

DATE: 26 OCTOBER 2022

**LEAD OFFICER: GARY DURRANT, SENIOR SPECIALIST ENVIRONMENTAL
PROTECTION, ENVIRONMENT AND REGULATORY
SERVICES**

**SUBJECT: GUILDFORD TOWN CENTRE AIR QUALITY ACTION PLAN -
POST CONSULTATION**

**DIVISION: GUILDFORD SOUTHEAST AND SOUTHWEST DIVISIONS,
FRIARY & ST NICOLAS AND HOLY TRINITY WARDS**

SUMMARY OF ISSUE:

Following the declaration of the Guildford Town Centre Air Quality Management Area (AQMA) on 21 October 2021, the Council has a statutory duty to produce an Air Quality Action Plan (AQAP).

To meet our statutory duties, the Council has produced a draft Air Quality Action Plan (AQAP) which identifies measures to improve air quality within the AQMA. The draft AQAP was the subject of a statutory and public consultation from 1 July 2022 to 3 August 2022, the results of which are outlined in this report and accompanying appendices.

The report seeks approval to submit the revised AQAP for Guildford Town Centre to the Department of the Environment and Rural Affairs (Defra). The report proposes to introduce or explore the feasibility of eight primary and eleven complementary measures to reduce nitrogen dioxide concentrations in order to make the area compliant with the air quality standard. The measures will need to be combined to achieve the aims of the plan, which are to reduce nitrogen dioxide emissions and exposure to below the annual mean objective level.

Post consultation the measures have been divided into three categories:

1. Primary AQAP Measures include an HGV ban during certain times, a Clean Air Zone (CAZ), Electric Vehicle delivery hub, Traffic Management Planning, development planning guidance, incident management planning and hire schemes for cycles and scooters.
2. Complementary AQAP Measures consisting of supporting initiatives and projects of a smaller scale.
3. Action Plan Measures either not to be pursued or considered for other initiatives including the Council's Air Quality Strategy.

The report concludes that feasibility studies are required for the primary measures both in isolation and combination.

RECOMMENDATIONS:

The Joint Committee (Guildford) is asked to:

- (i) Note the results of the public consultation carried out from 1 July 2022 to 3 August 2022 and any amendments to the Air Quality Action Plan.
- (ii) Approve and adopt the Air Quality Action Plan for Guildford Town Centre as shown in Appendix 2. If approved the final report will be submitted to the Department for Environment Food and Rural Affairs (Defra) for final approval.

REASONS FOR RECOMMENDATIONS:

To ensure that Guildford Borough Council meets its statutory duties to adopt an Air Quality Action Plan and to improve air quality within the Guildford Town Centre AQMA.

1. INTRODUCTION AND BACKGROUND:

- 1.1 The Guildford Town Centre Air Quality Management Area (AQMA) was approved on 21 October 2021 by the Guildford Joint Committee due to the breach of national air quality objective for annual mean of nitrogen dioxide. The extent of the AQMA is the bold blue area shown in Appendix 1.
- 1.2 The detailed air quality assessment, reported to the Joint Committee on 21 October 2021 concluded that the exceedance of the annual mean objective for nitrogen dioxide was attributable to emissions from road traffic. The source apportionment identified a breakdown of emissions with cars, buses/coaches, light and heavy goods vehicles, and motorcycles all contributing towards the elevated pollutant levels. The highest source at all modelled locations was from cars.
- 1.3 To meet our statutory duties following the declaration of the AQMA, the Council produced a draft Air Quality Action Plan (AQAP) which identified potential measures to improve air quality within the AQMA. The proposed timescale for the action plan measures is from 2022 to 2028 this represents the date by which the compliance would be achieved if nothing was carried out, based on modelled predictions of improvements in emissions from vehicles. Any measure delivered after this date would not contribute to meeting nitrogen dioxide standards in the town centre AQMA.
- 1.4 The Guildford Joint Committee 29 June 2022 approved a public consultation on a draft AQAP from 1 July 2022 to 3 August 2022 which can be seen in detail Appendix 2.
- 1.5 The consultation findings and proposed revisions to the AQAP and next steps are set out in the report.
- 1.6 On the 18 August 2022 Defra published revised Local Air Quality Management (LAQM) Statutory Policy Guidance with reference to AQMAs and AQAPs

which will be taken into consideration in the development and delivery of the AQAP:

- a. AQAPs must demonstrate how they will ensure that local Air Quality Objectives are met and maintained.
- b. AQAPs should set a date by when each measure will be carried out.
- c. The requirement for an AQMA to be declared within 12 months of identifying an exceedance of an air quality objective.
- d. Requirement for local authorities to produce an AQAP within 18 months of declaring an AQMA.
- e. The introduction of reminder and warning letters to increase local authority compliance with reporting.
- f. Guidance on how local authorities should work with Air Quality Partners.

2. ANALYSIS:

Draft Air Quality Action Plan

- 2.1 The draft AQAP identifies key priorities to consider when assessing measures that are likely to be effective.
 1. Most emissions arise from cars, with some contribution from LGVs and HGVs.
 2. There is no decipherable contribution from point sources or industry.
 3. There is also small contribution from buses.
 4. Any measures which will take longer than between 2025 and 2028 to implement and have effect, are unlikely to bring forward compliance with the air quality objectives
- 2.2 The evidence suggests that multiple measures are going to be required to have the necessary impact in the timescale required. When developing the draft AQAP measures the following categories of measures were considered:
 - Alternatives to private vehicle use (bus-based park and ride)
 - Policy guidance and development control (air quality supplementary planning guidance for developers)
 - Promoting low emission transport (taxi licensing conditions, electric cycle scooter hire scheme)
 - Promoting travel alternatives (promotion of cycling and walking with low pollution maps, facilitate and promote agile working with air quality as a focus, promotion of travel choices)
 - Public information (improve website information, schools air quality programme, Air Alert, Parking App)

- Transport planning and infrastructure (road strategy schemes to tackle congestion, tools to assess traffic management)
- Traffic management (reduction of speed limits, HGV ban at certain times, traffic control centre monitoring, traffic incident management, anti-vehicle idling, bus stop clearways)
- Vehicle fleet efficiency (sustainable procurement guidance)

Consultation

2.3 The public consultation on the draft AQAP was conducted from 1 July 2022 to 3 August 2022. Multiple channels including social media, emails and individual letters were used to engage with the consultees.

2.4 The Schedule 11 of the Environment Act 1995¹² set out a list of Statutory Consultees. In line with the Schedule 11, following statutory consultees were consulted:

1. Surrey County Council – Highways, Public Health and Climate Change
2. National Highways
3. Mole Valley District Council, Surrey Heath Borough Council, Waverley Borough Council and Woking Borough Council
4. Ward Councillors and Surrey County Councillors
5. All parish Councils in GBC area
6. National Health Service
7. Business community via the Experience Guildford newsletter

2.5 In addition, we also consulted with the following:

1. 300 residential properties within the AQMA
2. Community groups including those based on locality, interests and sport; for example: Schools in Guildford, University of Surrey, relevant Resident Associations, Guildford Action, Disability Challengers, Active Surrey, Wisley Action Group
3. Transport providers
4. Statutory undertakers for water, gas and electricity
5. Access groups
6. Licensed taxi and private hire operators and drivers

2.6 Letters were sent to residents within the AQMA boundary and emails were used to contact all other categories of consultees listed. Guildford Borough Council also published details of the consultation on its website.

- 2.7 All consultees were directed to a web page containing a questionnaire set out in Appendix 3.
- 2.8 All consultees were requested to complete the online questionnaire, however some of the other organisations and statutory consultees sent in written responses.
- 2.9 Throughout the consultation period communications were sent via social media and a reminder was sent to all consultees (except residents) one week before the closing date.

Response

- 2.10 A total of 398 consultation responses were received from a base of social media campaigns and 630 individual contacts. The consultation survey questionnaire is attached as Appendix 3.
- 2.11 In summary, the aim of the survey was to:
1. Understand the general awareness on existing measures that have beneficial impact on air quality; to understand if these existing measures could play a more significant role in air quality improvement in Guildford Town centre AQMA.
 2. Obtain views on the primary proposed measures in terms of general acceptability, effectiveness and potential cost to individuals.
 3. Provide opportunity for the consultee to recommend any additional measures which in their opinion are relevant to the AQMA.
- 2.12 The Technical Officer Air Quality Steering Group which includes environmental health officers, planners (policy and transport), local highways officers (Surrey County Council), plus the Council's contracted air quality consultants Air Pollution Services discussed the consultation responses to agree the measures to be proposed in the final draft AQAP.
- 2.13 Summaries of the consultation responses can be seen in:
1. Appendix 4 Public comments summarised. The full version of the responses is available on request from Regulatory Services at Guildford Borough Council regulatoryservices@guildford.gov.uk
 2. Appendix 5 Surrey County Council Highways
 3. Appendix 6 Written responses from public bodies (National Highways, Shalford Community Council are highlighted).
- 2.14 The measures were all rated in terms of potential for nitrogen dioxide reductions as shown in Options Matrix Table 4.5 of the Guildford Town centre Air Quality Action Plan, dated August 2022, reference: L1002_A_10, prepared by Air Pollution Services (enclosed as Appendix 2), with an overall score based on preliminary observations.
- 2.15 Considering the consultation and discussion amongst the Technical Officer Steering group, the AQAP measures were divided into three categories:

1. Primary
 2. Complementary
 3. Action Plan Measures not to be pursued or inserted into alternate strategies.
- 2.16 Summarised below are the main comments relating to the measures, a summary of references from consultees and the overall score from the Options Matrix Table 4.5 Page 31 Appendix 2.
- 2.17 All measures were scored out of 45 and have been listed in terms of prominence.

Primary Measures

Measure 3: Incident management and planning to reduce congestion (Primary measure) Score 33

- 2.18 This measure was not included in the survey questionnaire for consultation. However, the measure is supported by SCC Highways thus included in primary measures and has the potential to improve air quality.

Measure 6 HGV ban around the gyratory during peak and interpeak hours (Primary measure) Score 31

- 2.19 Whilst the HGV ban was seen as a popular choice by 72% respondents who either strongly agreed or agreed, there was some level of disagreement for economic and displacement reasons. For example one business that delivers skips noted that would not be feasible for operational reasons.

Measure 19 Electric vehicle deliveries and local delivery hubs (Primary measure) Score 27

- 2.20 There was 80% support for the delivery hubs, Onslow Park and Ride was cited as a potential site especially if it is no longer used. Other potential sites are on Council owned land within industrial estates.
- 2.21 At this time potential funding for this measure has not been assessed, however it is anticipated that it may attract commercial interest especially if any restrictions on HGV are implemented.
- 2.22 National Highways currently investigating potential electric vehicle charging hubs within the area of the A3 trunk road.

Measure 20 A Clean Air Zone (CAZ) or Low Emission Zone (LEZ) implementation categories not defined (Primary measure) Score 27

- 2.23 The potential CAZ raised 383 responses with 64% either agreeing or strongly agreeing, which demonstrates the potential level of support. SCC requested information and consideration of whether other traffic restraint measures have been considered which are set out in full in Appendix 3B.

- 2.24 The main concerns were the cost of converting either by purchase or lease to a low emission vehicle, diverted traffic affecting other areas, enforcement and the impact on the town's economy.
- 2.25 If the AQAP is approved, the next phase is to carry out a feasibility study to find an effective package which should include:
1. Both charging schemes and non-charging measures.
 2. Finding a practical scheme boundary and any diversionary routes.
 3. Traffic impacts, air quality modelling and cost benefit analysis.
- 2.26 The Council has the budget allocated to fund a feasibility study.

Measure 23 Development of air quality supplementary planning guidance (Primary measure) Score 26

- 2.27 The potential impact of development was included in many responses, who outlined projects including St Mary's Wharf, Guildford Park, Stag Hill, North Street, Guildford Plaza and others outside of the town centre.
- 2.28 The presence of the AQMA has already been included in the planning process for the outlined projects and will be standard as part of the consultation and pre application discussions with developers.
- 2.29 The Development Management Policies are being heard through the Local Plan Process. Supplementary guidance will be produced once these have been examined and the decision has been made.

Measure 31 Provide additional EV charging points off street (Primary measure) Score 30

- 2.30 Providing additional off street charging points is a new measure introduced in response to feedback by consultees and action by other agencies and is key in building confidence in residents, businesses and visitors converting to electric vehicles.
- 2.31 Consultees mentioned the lack of charging facilities, on street facilities being blocked by prolonged stays or non-EV vehicles, facilities on private land not being accessible and hardly any provision at existing fuel stations.
- 2.32 The infrastructure on street is managed by GBC and SCC but will revert to the latter post March 2023. Existing community facilities, educational establishments, blocks of flats in and around the AQMA are potential areas to explore as charging points are only normally required as part of new planning permissions.
- 2.33 The commercial sector could also contribute in terms of providing charging facilities particularly at locations where food and parcel deliveries originate.

Measures 32 and 33 Electric cycle and scooter hire Replaces Measure 27 electric/cycle scooter (Primary measures) Score 31

- 2.34 Both hire of electric cycles and scooters are being trialled across several towns and cities in response to air quality problems similar to those in Guildford.
- 2.35 A small percentage of responses (<1%) mentioned the use of electric cycles and scooters. They identified the need for publicising and introducing the ebike and scooter hire schemes. This action is set out as two separate measures in the AQAP as they are distinct initiatives. Cycles are for longer journeys, whilst scooters can be used for internal trips in the town centre including the AQMA.
- 2.36 Next steps are for SCC and GBC to evaluate the feasibility of this option.

Measure 34 Electric cargo bike hire scheme (Primary measures) Score 29

- 2.37 The use of electric cargo bikes can reduce journeys carried out by small vans and cars. To fully implement them to their most effective levels there needs to be a suitable network of accessible/priority routes.
- 2.38 Next steps are for SCC and GBC to evaluate the feasibility.

Complementary measures

Measure 4: Reduction of speed limits 20mph zones (Complementary measure) Score 33

- 2.39 A total of 391 responses were received of which 53% agreed or strongly agreed with the proposed measure and 31% disagreed/strongly disagreed.
- 2.40 The 20mph zones are advocated in the 'Liveable Neighbourhood Schemes' in the current Surrey CC Local Transport Policy (LTP4)¹³.
- 2.41 The Surrey CC Highway's full response is included in Appendix 3B.
- 2.42 Despite the high support for this measure the low nitrogen dioxide reduction score of 2 classified this as a complementary measure supporting air quality improvement. This measure will be further explored with SCC when resources allow.

Measure 7 Improve Guildford Borough Council website and education resources for schools (Complementary measure) Score 30

- 2.43 The impact of school journeys was frequently mentioned in the consultation response, and this initiative is linked to Measure 8. Out of 391 responses, 22 mentioned car as routine mode of travel for school runs. A few responses mentioned engine idling during the school pickup times.
- 2.44 Surrey County Council Travel Planning have introduced sustainable travel initiatives for schools. The Borough Officers will continue to work with them to explore means to encourage and recruit schools on to these programmes.

Measure 8 Schools air quality programme - monitoring, student air quality committee, educational materials, presentations (Complementary measure) Score 30

- 2.45 SCC as the education authority proposed this measure which GBC can support to deliver.
- 2.46 Respondents showed by the level of response that air quality is a subject that they have an interest in and both authorities, plus partners need to work with the educational establishments on not only learning, but also culture and operational issues such as Travel Plans.

Measure 15 and 16 Produce tools to assess traffic management schemes prior to implementation and evaluate measures to reduce traffic emissions (Complementary measures) Score 28

- 2.47 There are valuable tools that both GBC and SCC should use to assess and evaluate prior to changes and/or for improvements. One example was the Walnut Tree Close one-way system about which we received some negative comments in the consultation responses.
- 2.48 Ensure that tools are used on all traffic schemes which will need cooperation between National Highways, SCC and GBC.

Measure 17 Parking App to direct users to closest and cheapest spaces (Complementary measures) Score 27

- 2.49 The Official Guildford App by Experience Guildford currently provides real time parking information using latest technology delivered by Ethos in conjunction with Guildford Borough Council.
- 2.50 There is an opportunity for the Council to publicise the App further and explore the opportunity with Experience Guildford to add air quality information for the general public (including details of the AQMA and AQAP) and add further features to prompt and encourage drivers to use the nearest and most accessible car parks.

Measure 21 Anti vehicle idling scheme (Complementary measure) Score 26

- 2.51 77% of the total responses were in support for anti-idling initiatives throughout the town centre and beyond and many respondents expressed a desire for more enforcement.
- 2.52 Vehicle idling is an offence against the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002. The law states that it is an offence to idle your engine unnecessarily when stationary. If you fail to turn your engine off after being spoken to you may be issued with a fixed penalty notice of £20.
- 2.53 The legislation covers all vehicles on public roads including buses, taxis and private cars. However, it does not apply to vehicles moving slowly due to road works or congestion; vehicles stopped at traffic lights; vehicles under test or repair; or defrosting a windscreen and all these factors would need to be considered before taking formal action.

- 2.54 The Head of Operational Services at GBC has confirmed that; enforcement against anti idling is currently being carried out by Civic Enforcement Officers on streets and outside of schools.
- 2.55 Whilst a reduction in idling across the AQMA area would contribute to the reducing air pollution, the impact would not be significant therefore despite popularity it will be classed as a complementary measure and not be prioritised.

Measure 18 Facilitate and promote home, mobile and flexible working within the Council (Complementary measures) Score 27

- 2.56 Flexible working had already commenced before the Covid-19 pandemic for those officers where working at home was appropriate and further increased as part of the control measures during the pandemic.
- 2.57 Explore expanding home and flexible working by including homeworking and flexible working where possible when employing contractors.

Measure 22 Bus stop clearways (Complementary measure) Score 25

- 2.58 There was no specific response on this topic. It may have benefits where buses stopped at the bus stops impede traffic flow potentially on Portsmouth Road and Millbrook.
- 2.59 Whilst not assessed as a priority, as several factors need to be examined, such as frequency of buses on the route, queuing during the bus stopping, and constraints such as sufficient road space.

Measure 26 Taxi licensing conditions eg vehicle emission standards (Complementary measure) Score 25

- 2.60 Consultation with the taxi and private hire licensees was carried out via the Council's regular newsletter. The commitment to reduce the taxi fleet emissions has been initiated by a change in the Council's Taxi and Private Hire Policy. There was support for reduced emission standards amongst the taxi and private hire trade but some concerns were raised about the provision of sufficient electric vehicle charging points. Incentivising the conversion to an electric/low emission fleet was also suggested as a way to speed up the process.
- 2.61 There is currently Defra grant funding across several Surrey authorities including Guildford to subsidise low emission taxis, this is subject to final details but has already generated interest from the operators.
- 2.62 The taxi licences are subject to conditions which limit emissions.
- 2.63 To impact on emissions, it is important to set standards that are common to all within the taxi fleet, to ensure consistency and a level playing field for proprietors, operators, and drivers. The age of vehicles and the exhaust emission specification are critical to the level of pollutants emitted. Consequently, to improve air quality and reduce emissions from the licensed fleet, standards relating to the exhaust emissions will be introduced in addition to the requirements regarding the age of vehicles.

- 2.64 Licensing from 1st April 2021 requires all renewal applications from 1 January 2025, must meet or exceed Euro 6 emission standards (Euro 6 compliant being registered on or after 6 Feb 2014). As the taxi fleet change their vehicles over the coming years emissions will reduce.

Measure 28 Sustainable Procurement Guidance (Complementary measure) Score 28

- 2.65 Both GBC and SCC could improve the sustainability criteria when procuring good and services whilst still meeting procurement standards by producing guidance for officers procuring goods and services.
- 2.66 Officers to explore the production of guidance.

Measure 30 Improved facilities for walking and cycling (Complementary measure) Score 27

- 2.67 Approximately 35% of responses expressed concern that safe infrastructure for walking and cycling away from main roads was not sufficient to encourage a change of habit. They cited examples such as lack of cycling lanes in the town centre and the lack of route connectivity.
- 2.68 SCC and the Borough Council both have schemes planned that will improve cycling and walking routes in and around the town centre which will encourage people out of their cars to other forms of transport.
- 2.69 SCC have adopted a scheme of Liveable Neighbourhood which identifies delivery of cycling infrastructure where there is demand. Liveable Neighbourhood schemes are very relevant to the AQAP and a potential action that could be delivered in partnership with the county council.

Measure 35 Improved awareness of existing schemes (Complementary measures) Score 37

- 2.70 The consultation showed that there was low awareness of existing schemes which contribute to improving air quality. Steps to improve awareness and uptake of existing schemes would help improve air quality across the AQMA and the borough.

Measures not to be put forward or pursued as part of other strategies

Measure 1: New bus-based park and ride (Not to be pursued) Score 38

- 2.71 Whilst Park and Ride facilities received positive support from many and the electric buses serving them were seen as a good asset, Onslow and Spectrum Park and Rides have both been suspended since the Covid 19 pandemic. Consultation feedback also stated that the frequency of buses was inconsistent and unreliable, plus the pricing system discriminating against high passenger carloads were noted.
- 2.72 SCC also stated that existing park and rides should be promoted as alternatives to town centre parking, plus the suitability of sites should be reviewed as they are deemed with reference to Spectrum and Artington being too near to the town centre.

- 2.73 Introduction of any further Park and Rides have been discounted as a measure in the AQAP as the current demand is low and any scheme would take longer to fully implement than the duration of the AQAP.

Measures 2 and 5: Road Strategy Schemes (Not to be pursued) Scores 33 and 31

- 2.74 Delivery of any major road strategy scheme would only be realised after this plan has to be delivered so has been excluded.

Measure 29 Incentivise retrofitting scheme for buses to allow low emission fuels (Not to be pursued) Score 24

- 2.75 This option is not to be pursued as funding for these schemes is not available to local authorities and the implementation time is unlikely to be in the timeframe for delivery of this plan.

Measure 36 Low traffic neighbourhoods (LTN) (Additional proposed measure not to be pursued) Score 19

- 2.76 There was a proposal to create an LTN in the area between the Farnham and Portsmouth Roads was supported by SCC.
- 2.77 This potential scheme would benefit those living in and around the residential Wodeland Avenue/ The Mount area during peak times, but not the AQMA area directly. As these roads are currently used as a cut through to avoid town centre congestion, hence there are some local benefits to restrictions at peak times.
- 2.78 This is listed as a measure to be rejected due to the low score associated with the reduction of nitrogen dioxide levels in the AQMA; however SCC may wish to consider the impact of implementing this action if it is pursued further in terms of potential for more traffic diverting to the AQMA.

Measures not to be pursued due

- 2.79 All measures in the AQAP must meaningfully contribute to a reduction in air quality levels and after evaluation the following measures have been discounted as they would not lead to any or significant improvement in air quality.
- 2.80 Many of these measures help improve knowledge about air quality and may be considered for inclusion in a revised Guildford Air Quality Strategy.
- Measure 10 Promotion of low pollution route maps to public (Not to be pursued) Score 28
 - Measure 11 Postcode air quality checker (Not to be pursued) Score 28
 - Measure 12 Air Alert System (Not to be pursued) Score 28
 - Measure 13 Provide air quality information on current conditions in Guildford and what residents can do to help (Not to be pursued) Score 28

- Measure 14 Provide indoor air quality information to residents how they can improve their conditions (Not to be pursued) Score 28
- Measure 24 Improving modelling predictions of nitrogen dioxide concentrations (Not to be pursued) Score 25
- Measure 25 Promotion of Travel Choices (Not to be pursued) Score 25
- Measure 9 Promotion of cycling travel route maps to public (Not to be pursued) Score 28

3. OPTIONS:

- 3.1 As Guildford Borough Council are under a statutory duty to adopt an Air Quality Action Plan for the AQMA in Guildford town centre, inaction is not an option.
- 3.2 There are two options available after considering the information in this report.
- A. Approve and adopt the revised Air Quality Action Plan for Guildford Town Centre as shown in Appendix 1. To be submitted to Defra by 30 October 2022.
 - B. Adopt a modified version of the Air Quality Action Plan for Guildford Town Centre. To be submitted to Defra by 30 October 2022.
- 3.3 Officers recommend Option A as analysis of the evidence suggests taking forward this action plan and implementing a selection of these measures in an appropriate timeframe will reduce nitrogen dioxide to level where there is no longer an exceedance of the air quality objective expressed as an annual mean.
- 3.4 If nitrogen dioxide levels are reduced to the levels predicted so the air pollution is brought within statutory levels, then the AQMA could be revoked.

4. CONSULTATIONS:

- 4.1 Consultation on the revised AQAP after the public consultation has taken place with senior officers and the lead member for air quality and climate change; Councillor Cait Taylor Guildford Borough Council, who supports the adoption of the AQAP, the county members for Guildford and the Cabinet Member for Highways Councillor Matt Furniss have also been sent the draft report. (NB to be sent following Exec Liaison to Cllr Furniss)
- 4.2 We have briefed the Borough ward members for the relevant wards.

5. FINANCIAL AND VALUE FOR MONEY IMPLICATIONS:

- 5.1 Guildford Borough Council's has produced the AQAP from existing budget and officer resource within Environment and Regulatory Services.
- 5.2 It must be noted that officers from other services within the Steering Group have contributed significantly in terms of time and expertise.

- 5.3 To help progress statutory air quality duties across the Council including the AQAP an officer has been seconded temporarily on a part time basis until the 1 April 2023 with their substantive post being backfilled with additional funding that has been secured.
- 5.4 A proportion of the additional funding has also been budgeted for the feasibility study on the primary measures (£50,000 approximately) and associated data collection (£20,000 approximately for an Automatic Number Plate Recognition survey)
- 5.5 External grant funding opportunities for the chosen primary measures will need to be secured as it is unlikely that either Council will be able to fully fund the measures within existing resources. Securing the necessary funding to the deliver the primary measures will be a key factor in the feasibility studies.
- 5.6 Resources available for implementing the AQAP should be dedicated to delivering the primary measures which will contribute the most to improving air quality below the legal limits.

Legal implications

- 5.7 The provisions of Part IV of the Environment Act 1995 established a national framework for air quality management, which requires all local authorities to conduct periodic local air quality reviews.
- 5.8 Under Section 84 of the Environment Act 1995 the Council is required to produce an AQAP following the designation of the AQMA.
- 5.9 The Council must produce and consult on an AQAP, which details the proposed actions to ensure that air quality in the area improves.
- 5.10 Defra guidance up until August 2022 had stated that the AQAP should be produced within 12 months of the designation. The timescale has now been amended to 18 months allowing Local Authorities more time to produce a suitable plan.
- 5.11 The Defra LAQM (Local Air Quality Management) Statutory Policy Guidance LAQM. PG22 for England which was updated in August 2022 reflects the strengthened LAQM framework provided by Schedule 11 of the Environment Act 2021.
- 5.12 The Environment Act 2021 requires AQAPs to demonstrate how they will ensure that Local Air Quality Objectives are met and maintained meaning AQAP must be deliver air quality improvements.
- 5.13 The AQAP should set out the date when each measure or combination of measures will be carried out. AQAPs which do not fulfil these criteria will need to be revised.

6. EQUALITIES AND DIVERSITY IMPLICATIONS:

- 6.1 An Equalities Impact Assessment (EIA) has been carried out and the following issues were identified:

- The consultation methodology included all citizens who live, work, pass through or use the town centre area.
 - Officers considered the full range of people, businesses and voluntary bodies affected by the measures.
 - Ensures all stakeholders are aware of the consultation and how to access it including those with sight and hearing disabilities.
 - Responded and provided requests for translations and/or documents in other languages on request.
 - Consult stakeholders in a considerate manner and take account of those who may need additional time for constitutional reasons such as charities and representative groups.
- 6.2 It is anticipated that the proposed measures to improve air quality may benefit those individuals who suffer with pre-existing medical conditions that are sensitive to poor air quality.
- 6.3 The AQAP when implemented takes positive steps to improve health inequalities air quality in the AQMA.
- 6.4 The proposals will need to consider any potential impact on different socio-economic groups and businesses. For example if implementing measures has an impact on business operations or may prevent or impact access to services and infrastructure.
- 6.5 Further EIAs will be required when conducting feasibility on the primary measures.

7. LOCALISM:

- 7.1 The declaration of the AQMA and implementation of the AQAP has no disproportionate impact on any specific community. However, the public consultation which consisted mainly of residents has raised:
- a. The lack of cycling facilities in and around the AQMA.
 - b. Public transport affordability and frequency.
 - c. The impact of some potential measures in terms of costs in particular the purchase of low emission vehicles.
 - d. Economic impact on the town centre businesses.

8. OTHER IMPLICATIONS:

Area assessed:	Direct Implications:
Crime and Disorder	No significant implications arising from this report
Sustainability (including Climate Change and Carbon Emissions)	Set out below.
Corporate Parenting/Looked After Children	No significant implications arising from this report

Safeguarding responsibilities for vulnerable children and adults	No significant implications arising from this report
Public Health	Set out below.

8.1 Sustainability implications

Section 3.26 of the AQAP links the document with the Guildford Development Framework Sustainable Design, Construction and Energy, Supplementary Planning Document: <https://www.guildford.gov.uk/article/24211/Climate-Change-Sustainable-Design-Construction-and-Energy-SPD> There has not been any quantification of carbon emissions as a result of implementing any proposed measures.

8.2 Public Health implications

The proposed measures in the AQAP are intended to improve air quality and in turn have health benefit those living, working and visiting the vicinity of the AQMA particularly those with pre-existing health conditions connected to poor air quality. Air quality is a key public health priority identified in the Surrey Health and Wellbeing Strategy.

9. CONCLUSION AND RECOMMENDATIONS:

- 9.1 Following the designation of the AQMA in Guildford town centre, public consultation on a draft AQAP to improve air quality and meet the air quality objectives in the area was conducted.
- 9.2 The response from approximately 400 individuals or organisations demonstrated a significant the interest in not only air quality, but also local transport infrastructure challenges. All statutory consultees have been recontacted and they have been made aware of the revised plans shown in the draft AQAP.
- 9.3 Officers will ensure that the details of this report are widely circulated using the same media as the public consultation so that consultees receive feedback. All residents contacted as part of the consultation exercise will be sent letters with details of this report and the committee details.
- 9.4 Following consultation, the draft was revised, both removing and adding a number of measures. In addition, the remaining measures have been classified as Primary and Complementary, the former will be the main focus of future actions as described in this report.
- 9.5 Officers recommend Option A, as this plan proposes exploring the feasibility of a suite of measures that if implemented will reduce nitrogen dioxide levels so there is no longer an exceedance of the annual mean objective level.

10. WHAT HAPPENS NEXT:

- 10.1 If the action plan is adopted, officers from Guildford Borough Council and Surrey County Council will commence implementing the AQAP. The focus will be on exploring the feasibility of the primary measures and identifying the

combination of measures required to achieve compliance with air quality objectives.

- 10.2 After the feasibility studies have been completed the AQAP will be revised to reflect the primary measures that will be taken forward. Funding for the primary measures will be sought.
- 10.3 Once implemented the impact of the measures in reducing nitrogen dioxide levels will be monitored using diffusion tubes. The levels will be reported annually as part of the Council's Annual Status Report to Defra.
- 10.4 A report will be submitted annually to the Joint Committee or its equivalent in order that Members can monitor any progress.
- 10.5 When there is no longer an exceedance of the annual mean air quality objective level for nitrogen dioxide, the Council can submit evidence to Defra for the AQMA to be revoked.

Contact Officer:

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Consulted:

Surrey County Council: William Bryans, Transport Studies.

Guildford Borough Council: Director of Service Delivery, Corporate Management Board, Legal Services, Policy Planning, Regeneration and Infrastructure Team, Finance, Communications Team and Human Resources

Annexes:

Appendix 1 – Map of Air Quality Management Area in Guildford Town Centre

Appendix 2 – Draft (revised) Air Quality Action Plan August 2022 (Air Pollution Services and Guildford Borough Council)

Appendix 3 – Public consultation survey questions.

Appendix 4 – General public consultation summary

Appendix 5 Surrey County Council highways response.

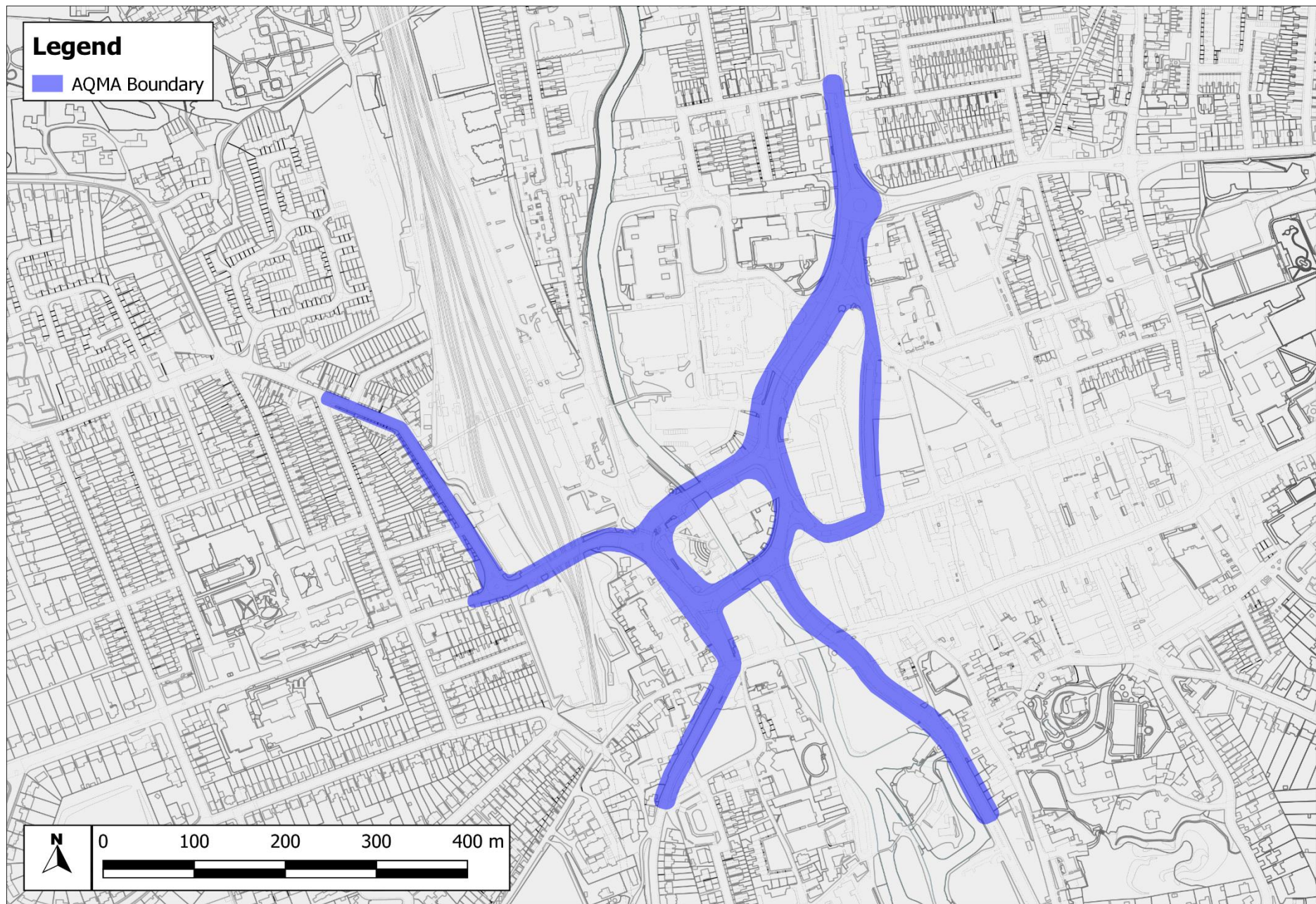
Appendix 6 Public consultation written responses and comments from organisations/authorities

Sources/background papers:

1. Guildford Town Centre Air Quality Management Area-Action Plan, Guildford Joint Committee Report 29th June 2022
<https://mycouncil.surreycc.gov.uk/documents/s86626/Guildford%20Town%20Centre%20air%20quality%20action%20plan.pdf>

2. Guildford Town Centre Air Quality Management Area, Guildford Joint Committee Report, 21st October 2021
<https://mycouncil.surreycc.gov.uk/documents/s81993/Guildford%20AQMA%20report.pdf>
3. Local Air Quality Management, Policy Guidance (PG16), Defra, April 2016
<https://laqm.defra.gov.uk/documents/LAQM-PG16-April-16-v1.pdf>
4. Local Air Quality Management, Technical Guidance (TG16), Defra, April 2016
<https://laqm.defra.gov.uk/technical-guidance/>
5. Air Quality (England) Regulations 2000
<http://www.legislation.gov.uk/uksi/2000/928/contents/made>
6. The Environment Act 1995
<https://www.legislation.gov.uk/ukpga/1995/25/contents>
7. The Air Quality (England) (Amendment) Regulations 2002
<http://www.legislation.gov.uk/uksi/2002/3043/contents/made>
8. UK Air Quality Strategy (DEFRA 2007)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf
9. Guildford Borough Council - Annual Status Reports and air quality monitoring results
<https://www.guildford.gov.uk/article/19807/Air-quality-monitoring>
10. Clean Air Zone Framework
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf
11. Revised LAQM Statutory Policy Guidance LAQM.PG22
<https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-Policy-Guidance-2022.pdf>
12. Schedule 11 of the Environment Act 1995, Air Quality – Supplemental Provisions: <https://www.legislation.gov.uk/ukpga/1995/25/schedule/11>
13. Surrey County Council's Local Transport Plan, LTP4
<https://www.surreycc.gov.uk/roads-and-transport/policies-plans-consultations/transport-plan>

GUILDFORD TOWN CENTRE AQMA BOUNDARY 22-10-2021



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AIR POLLUTION
SERVICES

Guildford Borough Council Guildford Town Centre Draft Air Quality Action Plan

In fulfilment of Part IV of the
Environment Act 1995
Local Air Quality Management

August, 2022

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- Report reference number: AQAP GBC 2022
- Date: 24 August 2022

Report Prepared By:



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SERVICES**

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Quality Assurance

Reference: L1002_A_10
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Date Published: 24 August 2022
Approver: Kieran Laxen
Date Approved: 24 August 2022

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Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of Guildford Borough Council's (GBC's) statutory duties required by the Local Air Quality Management framework. It outlines the action we will take to improve air quality in Guildford Town Centre between 2022 and 2027.

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas (Wheeler, 2005) (Defra, 2006) (Barnes, J., Chatterton, T., & Longhurst, J., 2019).

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion (Defra, 2013). Guildford Borough Council is committed to reducing the exposure of people in Guildford Borough Council to poor air quality in order to improve health.

GBC has developed a set of primary actions which are considered measures likely to be viable within the timeframe to reduce NO₂ concentrations within the AQMA. In addition to the primary measures, there is a set of complementary measures which are likely to be viable but may have a lesser direct effect on reducing the NO₂ concentration.

GBC's priorities are to reduce congestion and emissions within Guildford Town Centre (focusing within the newly declared AQMA), improve vehicle fleet emissions where possible, educate the public about air quality, and to promote travel alternatives. In terms of measures within this plan, the following points have been taken into consideration:

- The majority of emissions arise from cars, with significant contributions also from Light Goods Vehicles (LGVs), Heavy Goods Vehicles (HGVs) and buses/coaches;
- There is no decipherable contribution from point sources or industry; and
- Any measures which will take longer than 2027 to implement and have effect, are unlikely to bring forward compliance with the air quality objectives.

Because of the above points, it is going to be very difficult to implement a measure which will have a large enough impact in isolation to improve the situation in a short timescale; multiple measures will thus need to be implemented.

This AQAP outlines how GBC plan to effectively tackle air quality issues within the Council's control. However, it is recognised that there are a large number of air quality policy areas that are outside of our GBC's influence (such as vehicle emissions standards agreed in Europe), but for which GBC may have useful evidence; GBC will continue to work with regional and central government on policies and issues beyond GBC's direct influence.

Responsibilities and Commitment

This AQAP was prepared by Air Pollution Services on behalf of the Environment and Regulatory Services of Guildford Borough Council with the support and agreement of William Bryans of the Strategic Transport Team, Surrey County Council, as well as a wider steering group made up of Guildford Borough Council local authority officers.

This AQAP has been approved by:

Councillor Cait Taylor, Lead Member for Air Quality and Climate Change.

This AQAP will be subject to review every five years with annual appraisal of progress and reporting to the Guildford Joint Committee (Surrey County Council and GBC). Progress each year will be reported in the Annual Status Reports (ASRs) produced by Guildford Borough Council, as part of our statutory Local Air Quality Management duties.

If you have any comments on this AQAP, please send them to:

Write to: Environment and Regulatory Services, Guildford Borough Council, Millmead House, Millmead, GU2 4BB

Telephone: 01483 505050

Email: regulatoryservices@guildford.gov.uk

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1 Introduction

This report outlines the actions that Guildford Borough Council (GBC) will deliver between 2022 and 2027 in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to the Guildford area.

It has been developed in recognition of the legal requirement on the local authority to work towards Air Quality Strategy (AQS) objectives under Part IV of the Environment Act 1995 (HMSO, 1995) and Section 11 of the Environment Act 2021 (HMSO, 2021), along with relevant regulations made under the Act to meet the requirements of the Local Air Quality Management (LAQM) statutory process.

This Plan will be reviewed every five years at the latest and progress on measures set out within this Plan will be reported on annually within GBC's air quality report (ASR).

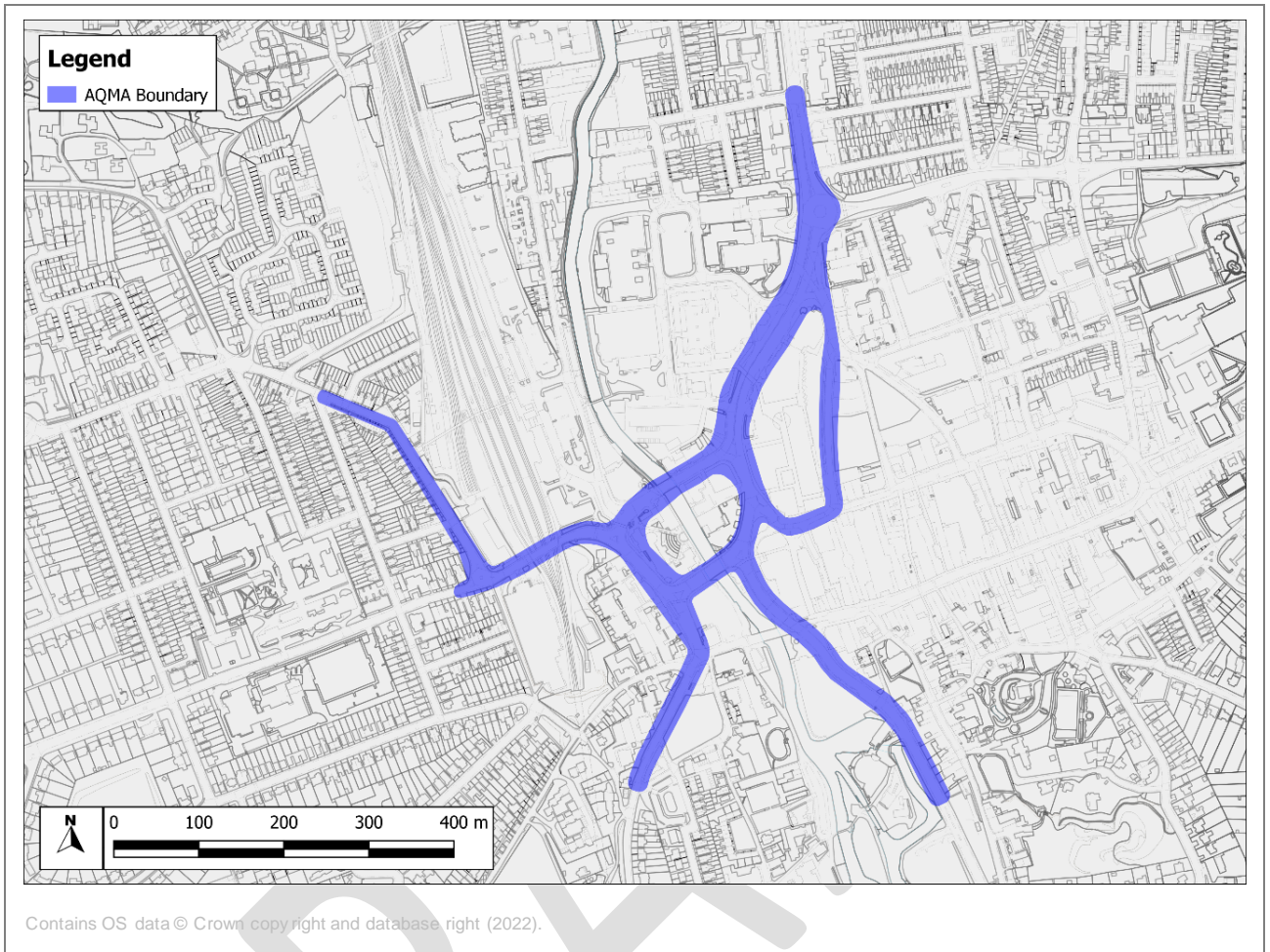
GBC, which is one of the local authorities in Surrey, faces a number of challenges in order to improve air quality. Surrey is a densely populated county and traffic flows on A roads are almost double the national average. In Guildford Town Centre, a combination of volume of vehicles, stop start traffic caused by congestion, and properties situated close to the carriageway (meaning that high concentrations don't disperse as quickly as they would elsewhere) has led to high concentrations in a localised area. A number of options are included in this report, which have been evaluated by the AQAP steering group.

2 Summary of Current Air Quality in Guildford Town Centre

Under Part IV of the Environment Act 1995 (and amendments through the Environment Act 2021), Local Authorities are required to review and assess air quality in their areas and to report annually against air quality objectives for specified pollutants of concern, to Defra. For each air quality objective, local authorities have to consider whether the objective is likely to be achieved. Where it appears likely that an air quality objective is not being met, the authority must declare an AQMA. Following the declaration of an AQMA, the authority must then develop an AQAP which sets out the local measures to be implemented in pursuit of the air quality objectives.

Prompted by the Review and Assessment process, an AQMA was submitted to Defra for declaration in Guildford Town Centre in October 2021 following the recommendations of the commissioned Detailed Assessment (APS, 2021). The Detailed Assessment suggested that there may be exceedances of the 1-hour mean and annual mean nitrogen dioxide (NO₂) air quality objectives in the centre of Guildford, along several roads. The AQMA has been proposed across many roads within the town centre, with the main source of emissions being from road traffic, which is exacerbated by the canyon nature of the roads (i.e. properties close to the carriageway resulting in reduced dispersion at the building facades). Figure 1 shows the extent of the Guildford Town Centre AQMA (shaded in blue).

Figure 1 – Proposed Guildford AQMA



3 Guildford Borough Council's Air Quality Priorities

3.1 Public Health Context

Air pollution is a major public health risk ranking alongside cancer, heart disease and obesity. A review by the World Health Organization (WHO) concluded that long-term exposure to air pollution reduces life expectancy by increasing the incidence of lung, heart and circulatory conditions. The Department of Health and Social Care's advisory Committee on the Medical Effects of Air Pollutants (COMEAP) have estimated that long-term exposure to man-made air pollution in the UK has an annual impact on shortening lifespans, equivalent to 28,000 to 36,000 deaths (COMEAP, 2018). Poor air quality can affect health at all stages of life. Those most affected are the young and old. In the womb, maternal exposure to air pollution can result in low birth weight, premature birth, stillbirth or organ damage. In children there is evidence of reduced lung capacity, while impacts in adulthood can include diabetes, heart disease and stroke. In old age, a life-time of exposure to air pollution can result in reduced life-expectancy and reduced wellbeing at end of life. There is also emerging evidence for a link between air pollution and an acceleration of the decline in cognitive function (Defra, 2019).

The Public Health function aims not only to improve health, but also reduce health inequalities by using an evidence-based approach to make recommendations on the delivery of health and well-being services. The Guildford Health and Wellbeing Strategy¹ recognises that *"Air Pollution is a significant public health issue. In Guildford, the key pollutants are specifically nitrogen dioxide (NO₂) and fine particulates, these are principally from traffic emissions. UK Health Security Agency estimate that 5.7% of deaths in those over 25 years old are from long term exposure to anthropogenic particulate pollution"*. Desired outcomes of the Strategy include identification of areas with high levels of pollution and introduce measures to improve air quality and encouraging the use of lower polluting transport options. As such, this action plan supports work underway within the public health arena.

¹ Available at [Health and Wellbeing Guildford Council](#)

3.2 Planning and Policy Context

3.2.1 Local Plan

The Guildford Borough Council Local Plan: Strategy and Sites which covers the period to 2034, was adopted on 25 April 2019. Air Quality is referred to in paragraph 4.6.31 of the Local Plan², which states:

“Well designed developments may actively help to enhance air quality and reduce overall emissions, therefore reducing possible health impacts”.

In relation to mitigation, air pollution is referred to under Policy ID3 (Sustainable transport for new developments):

“This mitigation: (b) will address otherwise adverse material impacts on communities and the environment including impacts on amenity and health, noise pollution and air pollution”.

Within the evidence base for the Local Plan, an investigation of the impacts of development plans on air quality has been undertaken. The air quality assessment considered the potential effect of the proposed plan at key receptor locations within GBC area. In summary, the findings of the assessment suggest that the effect of the Local Plan on annual mean NO₂ concentrations will be negligible and not a key constraint on development in the majority of the GBC area. The report advised that further detailed modelling would be advisable around roads where notable changes in traffic flows are predicted, including the A3 / A31 junction particularly Guildford and Godalming bypass and Farnham Road.

3.2.2 Guildford Transport Strategy

Guildford Borough Transport Strategy³ sets out a programme to address the historic infrastructure deficit and to mitigate the key transport impacts of proposed planned growth in the borough (and beyond). The Council is working closely with the key transport infrastructure and service providers to accelerate the development and delivery of appropriate improvements. These include Surrey County Council, as the Local Highway Authority; National Highways, who are responsible for the A3 trunk road and M25 motorway; Network Rail; and bus and community transport operators. There are a number of component strategies for specific issues, including transport and air

² Available at [New Local Plan Guildford Council](#)

³ Available at [Guildford Borough Transport Strategy 2017 PDF](#)

quality, one of the outcomes of which is to ensure ‘*No requirement for Air Quality Management Areas in Guildford borough*’.

3.2.3 Sustainability

The Guildford Development Framework includes a Climate Change, Sustainable Design, Construction and Energy Supplementary Planning Document (SPD)⁴, in order to effectively implement Sustainable Development (including reducing emissions of climate change gases and adapting and mitigating climate change through a variety of measures). Some of the measures included in the SPD relate to transport and increasing the usage of alternative modes of transport to the private vehicle, such as walking and cycling through the provision of access for pedestrians and cyclists and implementation of car clubs.

SCC Climate Change Strategy and Climate Change Delivery Plan are both very relevant local policy documents that touch upon air quality.

The strategy is: <https://www.surreycc.gov.uk/community/climate-change/what-are-we-doing/climate-change-strategy>

The delivery plan is: <https://www.surreycc.gov.uk/community/climate-change/what-are-we-doing/greener-futures-climate-change-delivery-plan-2021-to-2025>

3.2.4 Guildford Town Regeneration Strategy

The Guildford Town Centre Regeneration Strategy⁵ seeks to deliver a thriving and vibrant forward-looking town centre that embraces innovation to take best advantage of new and emerging technologies whilst respecting the town’s history and heritage and preserving what makes Guildford special. The strategy sets out a number of strategic priorities including aspirations to improve sustainable transport, improvements to the A3 and borough wide road network, high quality cycling and walking network, a reduction in air pollution and improving public health and wellbeing. The strategy builds on the town centre masterplan which aims to implement a number of place-making concepts including reducing the dominance of traffic, a healthy approach to movement which encourages a modal shift from the car to the other more sustainable forms of transport and a new riverside park.

⁴ Available at [Climate Change SPD Guildford Council](#)

⁵ Available at [Shaping Guildford website](#)

3.2.5 Local Transport Plan

The Surrey Transport Plan⁶ is the fourth Local Transport Plan (LTP4) for the county. It is a statutory plan (required by the Local Transport Act 2008 and Transport Act 2000), which replaced the third LTP (LTP3) on 12 July 2022. Like the previous LTPs, the Surrey Transport Plan is partly an aspirational document with funding not secured/guaranteed in place for all the measures identified. The strategies look forward to 2032 and are reviewed as necessary. The Local Transport Strategies and Forward Programmes will be replaced by the upcoming LTP4 Delivery Plan. The Delivery Plan is to be developed and published following publication of the new local transport plan guidance by DfT, which it is understood is expected imminently. Once produced, the Delivery Plan will take over the role of the LTSs and Forward Programmes and will be regularly updated. Surrey County Council anticipate that the Delivery Plan will have a strong focus on walking, cycling and bus schemes.

The vision of the LTP4 is:

“A future-ready transport system that allows Surrey to lead the UK in achieving a low-carbon, economically prosperous, healthy and inclusive county with excellent quality of life for all residents, whilst seeking to enhance both the built and natural environments”.

The four objectives of the LTP4 are:

1. *“to rapidly reduce carbon emissions, ensuring Surrey is on track for net zero emissions by 2050”;*
2. *“to support Surrey's growth ambitions and enable businesses and people to prosper sustainably”;*
3. *“to provide well connected communities that encourage equal access to travel to ensure no one is left behind”;* and
4. *“to create thriving communities with clean air, excellent health, wellbeing and quality of life”*

As one of the most densely populated counties in the UK with traffic flows on A roads almost double the national average, transport related problems are a major concern for people living and working in Surrey. There are a number of strategies which form

⁶ Available at [Surrey County Council Transport Plan](#)

part of the Surrey Transport Plan. One of the objectives of the Local Transport Plan is to create thriving communities with clean air, excellent health, wellbeing and quality of life. The previous Surrey Transport Plan included an Air Quality Strategy, which has been superseded by the new LTP (LTP4). A number of policy areas included in LTP4 will contribute to lower emissions and therefore improved air quality, and the LTP4 consequently now represents the county council's approach to improving air quality based on the following key policy areas:

- *planning for place (through shorter journeys),*
- *digital connectivity (through reduced journeys),*
- *active travel/personal mobility (through shifting local car trips to walking and cycling),*
- *public and shared transport (through shifting local car trips to public and shared transport),*
- *demand management for cars (through de-incentivising car trips, and encouraging a shift to other, cleaner modes),*
- *demand management for goods vehicles (through incentivising more efficient and cleaner freight movements locally),*
- *efficient network management (through reducing congestion and idling),*
- *promoting zero emission vehicles (through increasing the uptake of EVs and hydrogen and electric buses, and*
- *supporting behaviour change (through encouraging a shift from private petrol/diesel vehicles to more sustainable modes).*

3.2.6 Guildford Air Quality Strategy

The Guildford Air Quality Strategy⁷ identifies key air quality issues within the Borough and sets out an approach to maintaining and improving air quality. A key aim of the strategy is to establish and maintain good working relationships with key stakeholders to achieve the air quality objectives. The priorities of the strategy are to set out a clear approach to air quality, monitor and report on air pollution, reduce vehicle emissions, work with other agencies, use the planning framework, reduce emissions at source

⁷ Available at [Guildford Council Air Quality Strategy 2017-2022 PDF](#)

and provide the public with information. There is overlap with the measures set out in the Air Quality Strategy with those in this AQAP for Guildford Town Centre.

3.3 The Environment Act 2021

Paragraph 6, Schedule 11 of the Environment Act 2021 updated the Local Air Quality Management (LAQM) duties for Local Authorities in England. The key amendment to the Environment Act 1995 is the addition of Section 83A, which requires GBC to prepare an AQAP *“for the purpose of securing that air quality standards and objectives are achieved in an air quality management area”*.

The written plan should set out how the GBC will exercise its functions in order to secure that air quality standards and objectives are achieved and maintained thereafter in the area to which the plan relates.

The AQAP must set out ‘particular measures’ GBC will take to *“secure the achievement, and maintenance, of air quality standards and objectives in the area to which the plan relates, and must in relation to each measure specify a date by which it will be carried out”*.

GBC may revise an AQAP at any time and must revise an AQAP if it considers that there is a need for further or different measures to be taken to secure that air quality standards and objectives are achieved or maintained in the area to which the plan relates.

3.4 National Policy Context

3.4.1 Air Quality Strategy

The Air Quality Strategy (Defra, 2007) published by the Department for Environment, Food, and Rural Affairs (Defra) and Devolved Administrations, provides the policy framework for air quality management and assessment in the UK. It provides air quality standards and objectives for key air pollutants, which are designed to protect human health and the environment. It also sets out how the different sectors: industry, transport and local government, can contribute to achieving the air quality objectives. Local authorities are seen to play a particularly important role. The strategy describes the LAQM regime that has been established, whereby every authority has to carry out regular reviews and assessments of air quality in its area to identify whether the

objectives have been, or will be, achieved at relevant locations, by the applicable date. If this is not the case, the authority must declare an Air Quality Management Area (AQMA) and prepare an action plan which identifies appropriate measures that will be introduced in pursuit of the objectives.

The Air Quality Strategy is due to be updated to, amongst other considerations, account for the amendment to the Environment Act 1995, e.g. the addition of Section 83A.

3.4.2 Clean Air Strategy 2019

The Clean Air Strategy (Defra, 2019) sets out a wide range of actions by which the UK Government will seek to reduce pollutant emissions and improve air quality. Actions are targeted at four main sources of emissions: Transport, Domestic, Farming and Industry.

3.4.3 Reducing Emissions from Road Transport: Road to Zero Strategy

The Office for Low Emission Vehicles (OLEV) and Department for Transport (DfT) published a Policy Paper (DfT, 2018) in July 2018 outlining how the government will support the transition to zero tailpipe emission road transport and reduce tailpipe emissions from conventional vehicles during the transition. This paper affirms the Government's pledge to end the sale of new conventional petrol and diesel cars and vans by 2040 [now 2030], and states that the Government expects the majority of new cars and vans sold to be 100% zero tailpipe emission and all new cars and vans to have significant zero tailpipe emission capability by this year, and that by 2050 almost every car and van should have zero tailpipe emissions. It states that the Government wants to see at least 50%, and as many as 70%, of new car sales, and up to 40% of new van sales, being ultra-low emission by 2030.

The paper sets out a number of measures by which Government will support this transition but is clear that Government expects this transition to be industry and consumer led. If these ambitions are realised, then road traffic-related NO_x emissions can be expected to reduce significantly over the coming decades.

3.4.4 The Decarbonisation Plan

More recently, the Government published a Decarbonisation Plan in 2021, which states *“new diesel and petrol cars and vans would no longer be sold from 2030, and*

that all new cars and vans must be fully zero emission at the tailpipe from 2035”, bringing the dates significantly forward from the DfT Policy Paper.

3.4.5 The Industrial Strategy

The Government has published a white paper that sets out a long-term ‘Industrial Strategy’ for the UK (HM Government, 2017). It includes a key policy to *“support electric vehicles through a £400m charging infrastructure investment and an extra £100m to extend the plug-in car grant”* and states *“the UK’s road and rail network could dramatically reduce carbon emissions and other pollutants”*. Unlike their fossil fuel counterparts, electric vehicles do not release nitrogen oxides (NOx) emissions; if the strategy is fulfilled then NOx emissions will reduce significantly over the coming decades.

3.4.6 The Clean Growth Strategy

An ambitious blueprint for Britain’s low carbon future was set out by the Government in a Policy paper (HM Government, 2018) in April 2018. Although this strategy focuses on reducing the UK’s carbon footprint, it contains several policies and proposals that relate to air quality. This includes ending the sale of new conventional petrol and diesel cars and vans by 2040, supporting the uptake of ultra-low emission vehicles (ULEVs), developing electric vehicle infrastructure, providing funds for ULEV taxis and low emission buses, investment in cycling and walking, and promoting the shift of freight from road to rail.

3.4.7 The 25 Year Environment Plan

The Government has published a Policy paper called the ‘25 Year Environment Plan’ (HM Government, 2019) which set out what the Government will do to improve the environment within a generation. This includes the first goal ‘Clean air’ where the government states *“we will achieve clean air by...meeting legally binding targets to reduce emissions of five damaging air pollutants. This should halve the effects of air pollution on health by 2030...Ending the sale of new conventional petrol and diesel cars and vans by 2040...Maintaining the continuous improvement in industrial emissions by building on existing good practice and the successful regulatory framework”*.

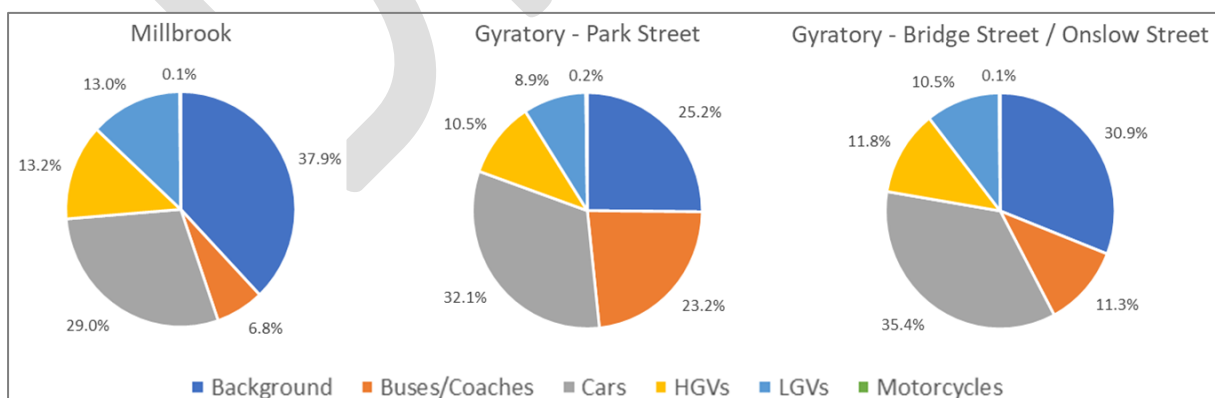
3.5 Source Apportionment

The AQAP measures presented in this report are intended to be targeted towards the predominant sources of emissions within Guildford Town Centre, as these will have the most significant impacts and therefore value for money.

A source apportionment exercise was carried out by GBC in 2021 on modelled concentrations at relevant receptors in Guildford Town Centre. The total concentration of a pollutant comprises contributions from road traffic as well as other local sources and those that are transported into the area from further away. The key source of emissions in the town centre are emissions from road traffic, therefore the source apportionment focuses on the contributions from different vehicle types and backgrounds (i.e. all other sources).

Figure 2 shows the contribution from different vehicle types to NO₂ concentrations along with background contributions at those locations. At the key locations of exceedance in Guildford Town Centre, a large proportion of the resulting concentration is caused locally by emissions from cars. Heavy goods vehicles (HGVs), light goods vehicles (LGVs) and buses/coaches also contribute significant proportions, of approximately 10% each in general, with Park Street having a high contribution from buses/coaches (23%). Very little is contributed from motorcycles. Measures focusing on cars, HGVs, LGVs and buses/coaches would help to improve air quality. In particular, buses/coaches are clearly important at Park Street.

Figure 2: Contributions of Different Sources to Total Predicted Annual Mean Nitrogen Dioxide Concentration ($\mu\text{g}/\text{m}^3$) at Each Location in 2021



3.6 Required Reduction in Emissions

The degree of improvement needed in order for the annual mean NO₂ objective to be achieved is defined by the difference between the highest measured or predicted concentration and the objective level (40 µg/m³).

In terms of describing the reduction in emissions required, it is more useful to consider nitrogen oxides (NO_x). The required reduction in local NO_x emission has been calculated in line with guidance presented in LAQM.TG16 (Defra, 2018)⁸.

Table 3.1 sets out the required reduction in local emissions of NO_x that would be required at the worst-case location where an exceedance is predicted, in order for the AQMA compliance level (38 µg/m³ for this AQMA) to be achieved.

The highest annual mean NO₂ concentration has been predicted at Park Street (60.9 µg/m³), requiring a reduction of 22.9 µg/m³ for the compliance level to be achieved. Table 3.1 shows that at this location a reduction of 56.6 µg/m³ in NO_x emissions would be required in order to achieve the objective. This equates to a reduction of 57% in local road traffic emissions at this location.

Table 3.1 – Improvements in Annual Mean NO₂ and NO_x Concentrations Required in 2019 to Meet the Objective

Receptor	Required Reduction in Annual Mean NO ₂ (µg/m ³)	Required Reduction in Annual Mean NO ₂ (% of total predicted NO ₂)	Required Reduction in Road NO _x Emissions (µg/m ³)	Required Reduction in Road NO _x Emissions (% reduction in road NO _x)
Park St	22.9	37.6	56.6	57.0

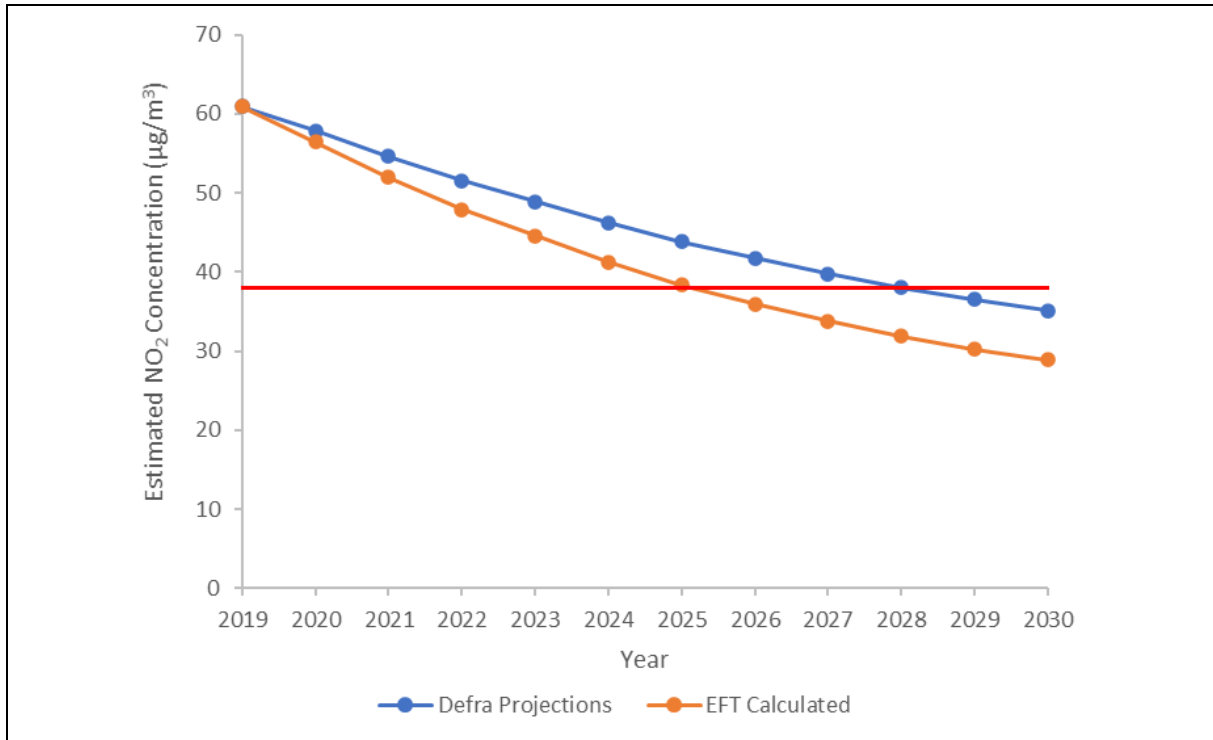
3.7 Year when objective is predicted to be achieved

A brief analysis has been undertaken to estimate when the objective may be achieved without any further intervention. It should be noted that this is not an accurate prediction but is based on factors provided by Defra for quantifying air quality concentrations in future years. The following graph shows reductions in concentrations at the worst-case modelled receptor within the AQMA, using two different methods; Defra’s roadside NO₂ projection factors and using the Emissions Factors Toolkit (EFT) published by Defra (assuming no traffic growth).

⁸ At the point this document was being finalised the updated LAQM Technical Guidance 2022 was published. The approach is also consistent with the update.

The graph indicates that, without intervention, the annual mean NO₂ concentrations may reduce below the compliance level (38 µg/m³ for this AQMA) at some time between 2025 and 2028.

Figure 3: Projected Concentrations in Future Years at Receptors Predicted to Exceed Air Quality Objectives



Predicting pollutant concentrations in a future year will always be subject to uncertainty. It is necessary to rely on a series of projections as to what will happen to traffic volumes, background pollutant concentrations and vehicle emissions. Although traffic volumes are generally increasing across the UK, background pollutant concentrations are expected to decrease into the future with cleaner technologies becoming available and increasing uptake of low emission vehicles.

Future year vehicle emission rates are based on a range of factors, such as expected vehicle fleet release dates, anticipated improvements in emission reduction technologies, expected uptake rates of different vehicles based on government policies, etc. It is therefore possible that the expected future emission rates in the EFT may differ from reality. Historically, evidence had suggested that Defra’s EFT exaggerated reductions in NO_x emissions as expectations of reductions from diesel vehicles were included which were not seen in practice. However, analyses of recent NO_x measurements now provide evidence that vehicle controls are working and as a result Defra’s EFT provides the current best reflection of the rate of reductions into the

future. Due to the implications associated with the Covid-19 Pandemic upon vehicle fleet turnovers and low emission vehicle uptake, there remains uncertainty in predicting future compliance within the AQMA. GBC will continue to monitor and conduct modelling exercises over the forthcoming years to understand the real levels.

3.8 WHO Guidelines

The 2019 Clean Air Strategy (Defra, 2019) includes a commitment to set a “*new, ambitious, long-term target to reduce people's exposure to PM_{2.5}*” which the Environment Act 2021 commits the Secretary of State to setting. The World Health Organization (WHO) acknowledges that current evidence suggests no safe level for PM_{2.5} (particulate matter less than 2.5 micrometres in diameter). The WHO set a previous guideline, which was 10 µg/m³ as an annual mean and more stringent than the current air quality objectives, to reflect the level at which increased mortality from exposure to PM_{2.5} is likely. However, the WHO guidelines were updated in September 2021 and now include more stringent levels to reflect updated evidence of health effects (5 µg/m³ for PM_{2.5}), since the previous guidelines were published in 2005. Following the UK leaving the EU the Government have published the Environment Act 2021, which puts a duty on the Secretary of State to lay before Parliament an annual mean target for PM_{2.5} in ambient air before November 2022. The maximum annual mean PM_{2.5} concentration in the town centre has been predicted to be 16.9 µg/m³, below the air quality objective but above the WHO guideline level. Although the AQMA has not been declared for PM_{2.5}, GBC have a duty to work towards improving PM_{2.5} levels in the town centre. The new WHO guidelines also set a more stringent level of 10 µg/m³ for NO₂, which should be borne in mind when considering the level of ideal reductions to be achieved, particularly where there is highly sensitive exposure or a densely populated area of exposure.

3.9 Key Priorities

Based on the evidence provided above, the following issues need to be considered when deciding on which measures are likely to be effective:

- The majority of emissions arise from cars;
- There is a significant contribution of emissions from LGVs and HGVs;
- There is a significant contribution from buses, particularly at Park Street;
- There is no decipherable contribution from point sources or industry;

- Any measures which will take longer than 2027 to implement and have effect, are unlikely to bring forward compliance with the air quality objectives.

Because of the above points, it is going to be very difficult to implement a single measure in isolation which will have a large enough impact to improve the situation in a short timescale; multiple measures will therefore be required. A number of measures have been discussed within the Action Planning process, anything implemented will need to be proportionate to the issue which has been identified, which is a localised issue around the gyratory and arterial roads, and considered in terms of potential wider impacts outside of the town centre (i.e. to avoid creating another AQMA elsewhere). The following sections outline measures which are proposed to be implemented, and those which require further investigation. Appendix A includes measures which have been discussed and discounted (and the reasons for being discounted).

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4 Development and Implementation of Guildford Town Centre AQAP

4.1 Consultation and Stakeholder Engagement

In developing this AQAP, GBC have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 4.1.

The consultation was carried out using the following media: emails, online survey, letters to over 300 residents located within the AQMA, newsletter articles, social media and presentations.

The response to our consultation stakeholder engagement is given in the Guildford Town Centre Air Quality Action Plan-Post Consultation Report presented to the Guildford Joint Committee on 26th October 2022.

Table 4.1 – Consultation Undertaken

Yes/No	Consultee
Not at this stage	The Secretary of State
Yes	The Environment Agency
Yes	The highways authorities (National Highways and Surrey County Council)
Yes	Neighbouring local authorities (Waverley Borough Council, Surrey Heath Borough Council, Woking Borough Council and Mole Valley District Council)
Yes	Other public authorities as appropriate, such as Public Health Surrey County Council, Education Surrey County Council, National Health Service and National Trust (Wey Navigation)
Yes	Bodies representing local business interests via email and newsletters
Yes	Local councillors both GBC and SCC, plus MP for Guildford Constituency
Yes	Parish councils, community groups and interested focus groups.
Yes	Bodies and companies representing local transport business interests and other organisations including bus companies, Railtrack and road freight companies
Yes	Local residents living within and near to the AQMA approximately 310 properties
Yes	Academic institutions including schools, colleges and further education.

4.2 Steering Group

The Air Quality Steering Group includes environmental health officers, planners (policy and transport), local highways officers (Surrey County Council), plus the GBC's contracted air quality consultants Air Pollution Services (a trading name of KALACO Group Ltd). Meetings are held with all or some of the group dependent on topics and other commitments, the latest post consultation meeting was held on the 4 August 2022.

Workshops were held on 21st October 2021 and 13th December 2021 to discuss measures for inclusion within the AQAP, including with Surrey County Council. Useful dialogues were had in relation to current and future practice, ideas for further measures and consultation as the AQAP is taken forward with a particular focus on the plans and visions for the town centre.

Matters relating to the Guildford Town Centre are also covered in the Consultation Shaping Guildford's Future⁹ launched on the 8 December 2021.

4.3 Existing and Committed Measures

A number of measures and initiatives, which will improve air quality, or raise awareness, are already being implemented in the Guildford area. These are not focussed specifically on Guildford Town Centre but will assist in reducing emissions more generally and increasing awareness of air quality, travel choice and choice of vehicle. These existing measures include:

- easitGUILDFORD¹⁰. This is a green travel network, which was launched in 2019, which currently has over 12 businesses signed up. There are benefits for employees to encourage car sharing and alternative travel to work, which include discounts on rail and bus travel, discounts on EV recharging, car sharing schemes, discounts on bikes and free car club membership.
- Electric buses. Guildford has introduced a fleet of nine electric buses for its park and ride service from car parks to the town centre to replace existing diesel buses on the routes. This is the first Park and Ride in the UK to operate using only electric buses.
- Surrey Air Alliance have delivered a Defra funded schools education project in AQMA areas. Around 40 schools in the County have taken part in the

⁹ See [Shaping Guildford's Future website](#) for more details.

¹⁰ See [the easitGuildford website](#) for more details.

programme which included workshops on air quality, cycle training and an anti-idling campaign;

- GBC has introduced a Green Scheme¹¹, which enables owners of electric vehicles to apply for a Green Parking Permit free of charge, which gives discounted parking in car parks;
- Project Aspire¹², which aims to improve the health and well-being of Guildford residents and to reduce social inequality, is about providing leadership, encouragement and support to all communities. The projects include initiatives to reduce dependency on cars and educational programmes in schools;
- GBC and Surrey County Council are incrementally improving the existing cycle network in the borough. An example of this is the Guildford-Godalming Greenway¹³, which links the two towns with a safe route suitable for people who are walking, cycling, using wheelchairs or families with children in pushchairs. The Guildford Local Committee, on 13 June 2018, adopted the Guildford-Godalming Greenway route into the Guildford Cycle Plan which is a Surrey County Council plan. At Guildford, the Greenway will link into the growing network of green routes around the town. The route exists and is being upgraded gradually. Surrey County Council currently have funding for a short section of it known as Dagley Lane, otherwise the route is not funded, but it is anticipated that developments would contribute to sections of the scheme.
- GBC is participating in iSCAPE (Improving the Smart Control of Air Pollution in Europe)¹⁴ which works on integrating and advancing the control of air quality and carbon emissions in European cities in the context of climate change through the development of sustainable and passive air pollution remediation strategies, policy interventions and behavioural change initiatives.
- Surrey County Council will begin a new one-way trial of Walnut Tree Close on the 29th May 2022 for a period of six months. This is part of the Town Centre Master plan which aims to create a more attractive pedestrian environment. If this one-way system proves beneficial to the impact of traffic on Walnut Tree Close and Guildford Town Centre, reduces queuing and conflicts along the road and gyratory, and improves the safety and environment, then it will be made permanent.
- An Electric Vehicle charging network is currently within the construction stage with 19 on street units installed in and around the AQMA in the last year.

Following the consultation, feedback was gathered in public aware of these existing measure. Figure 4 shows the response to Question 6 of the public survey considering awareness of the existing measures.








¹¹ See [What is Green Scheme Guildford Council](#) for more details.

¹² See [Aspire projects and future events Guildford Council](#) for more details,

¹³ See [Guildford Godalming Greenway website](#) for more details.

¹⁴ [iSCAPE website](#)

Figure 4: Results from Question 6 of the public survey.

6. Please tick the current air pollution reduction initiatives you are aware of			
Answer Choices		Response Percent	Response Total
easitGuildford (a green travel network launched in 2019, providing benefits to encourage businesses and employees to use sustainable travel options)		7.03%	23
Electric buses (nine electric buses serve the Park and Ride sites)		94.19%	308
Surrey Air Alliance of local authorities (including a schools education project and a grant to fund the introduction of electric taxis)		5.20%	17
Green Parking Scheme (enables electric vehicle owners to obtain a free parking permit and discounted parking in the GBC car parks)		18.96%	62
Project Aspire (which aims to protect the health and wellbeing of Guildford residents and reduce social inequality.		8.56%	28
Land use planning (Planning requirement for Air quality assessments of medium/large scale developments and/or Planning conditions for EV charging facilities in the allocated/shared car park of proposed development)		11.62%	38
The electric vehicle charging network and Improvements to cycle networks in the Borough for example the Guildford to Godalming link)		45.57%	149
		answered	327
		skipped	64

Where feasible, and funding is available, these projects will be continued and enhanced. Following feedback from the consultation there is benefit in increased awareness of easitGuildford and Green Parking Permit schemes and the land use planning requirements.

4.4 Development of AQAP Measures

In relation to Guildford Town Centre specifically, the following groups of measures, as categorised and outlined by Defra, have been considered. A brief overview of this consideration is included in [Table 4.2](#).

Table 4.2 – Measure Categories Considered in Guildford

Measure Category	Current Practice in Guildford / consideration for Guildford Town Centre
Alternatives to Private Vehicle Use	Bus based Park and Ride is already in place, and now fully electric. Additional services may be highly beneficial. GBC has adopted a policy to promote and facilitate home working, flexible start and finish times, compressed hours, mobile working and virtual meetings, and conference calls etc.
Environmental Permits	Not relevant at this location.
Freight and Delivery Management	Much freight and delivery is present in the town centre and contributes to elevated pollution levels. Measures to reduce emissions from these vehicles would be highly beneficial.
Policy Guidance and Development Control	Regional groups already operating in Surrey. An Air Quality Strategy for Guildford already adopted. GBC work within the planning system to request air quality assessments where relevant and ensure mitigation measures are implemented where necessary, although further improvements in local guidance would be highly beneficial.
Promoting Low Emission Plant	Not a major issue at this location.
Promoting Low Emission Transport	<p>Green scheme parking fees for Electric vehicles in GBC car parks. Electric vehicles as part of GBC vehicle fleet.</p> <p>Currently Environment and Regulatory al Health recommends conditions to the Planning Services on developments above 10 dwellings to have infrastructure for electric vehicle charging in each house or 10% EV spaces for unallocated car parking spaces.</p> <p>Electric vehicle car parking standards for new development are also promoted through Surrey County Council’s Vehicular and Cycling Parking Guidance (as well as via GBC’s Environmental and Regulatory Health Team). The guidance’s standards will be increased due to match the standards contained in the emerging Local Plan: Development Management Policies and Parking SPD¹⁵, to standards which, as a minimum, mirrors the Government’s proposals to be implemented via Building Regulations.</p> <p>Discounted car parking facilities for electric and ultra-low emission vehicles¹⁶.</p>
Promoting Travel Alternatives	GBC implemented easitGuildford, a green travel network, to promote alternative transport, car sharing, bike to work scheme, provision of lockers, changing facilities, shows to support cyclists, runners, walkers, promote P&R scheme and non-car use.
Public Information	This is being delivered through other projects such as easitGuildford and Project Aspire as outlined above. Further provision would be beneficial.

¹⁵ [Proposed Submission Local Plan](#)

¹⁶ [Parking Strategy Guildford Council](#)

Traffic Management	Traffic Management options are being discussed with Surrey County Council. There are several other schemes that may affect traffic in Guildford Town Centre in the near future that require further consideration. Any major changes to the road network would likely not be implemented within a short enough period to provide sufficient benefits in air quality within the AQMA. However, there may be minor changes that could be beneficial.
Transport Planning and Infrastructure	<p>Cycle network improvements such as the Guildford to Godalming Greenway are proposed. There is already a usable cycle route into Guildford, however, the Guildford to Godalming Greenway feasibility study demonstrated there is potential for the new greenway to encourage additional cycling trips. NOTE SCC Highways sated in their response that this is not complete.</p> <p>Existing cycling provision is predominantly situated on the carriageway, and the new greenway would provide a safe and accessibly walk for cyclists and pedestrians who are not comfortable using bus roads. The new greenway would be an upgrade to existing active travel facilities as the quality of the existing paths along this route is poor in places.</p> <p>The distance and topography means that there is a propensity to cycle between Guildford and Godalming. The scheme is looking to provide high-quality infrastructure for cycling and walking and may encourage some further modal shift of work trips.</p>
Vehicle Fleet Efficiency	Although GBC is promoting low emission public transport (particularly for the electric bus fleet for P&R), for other vehicle types these measures would be difficult to target for vehicles specifically driving through Guildford Town Centre. Continued improvements in the bus fleet are therefore considered further for this Action Plan.

Table 4.3 presents a short-list of initial measures which have been considered for implementation within the AQAP and were circulated for consultation and included commentary on each measure for context. Following feedback from the consultation process Measure 27 has been split into two measures (new measure 32 and 33) and any additional measures identified added. Additional measures following consultation feedback are set out in Table 4.4.

Table 4.3 – Initial Proposed Measures

Measure No.	Measure
1	A new bus-based park and ride
2	Road strategy schemes to tackle congestion on Strategic Road Network
3	Incident management and effective contingency planning to minimise traffic disruption and unnecessary congestion
4	Reduction of speed limits, 20 mph zones
5	Traffic control centre monitoring of traffic movement and providing real time traffic control over many traffic control installations
6	HGV ban around the gyratory during peak and interpeak hours.
7	Improve website information – Educational resources for schools
8	Schools air quality programme - monitoring, student air quality committee, educational materials, presentations
9	Promotion of cycling travel route maps to public
10	Promotion of low pollution route maps to public (walking)
11	Postcode air quality checker
12	Air Alert system
13	Provide air quality information on current conditions in Guildford and what residents can do to help
14	Provide indoor air quality information and what residents can do to improve their conditions
15	Produce tools to assess traffic management schemes prior to implementation
16	Produce tool to evaluate measures to reduce traffic emissions
17	Provide a parking App to direct users to closest and cheapest spaces
18	Facilitate and promote home, mobile, remote and flexible working within the Council
19	Electric vehicle (EV) deliveries, local delivery hubs
20	A Clean Air Zones (CAZ) and/or Low Emission Zone (LEZ) for buses + HGVs
21	Anti-vehicle idling scheme e.g. At level crossings, taxi ranks, the station, bus stops and outside schools.
22	Bus stop clearways
23	Development of air quality supplementary planning guidance for developers
24	Improving modelling predictions of NO ₂ concentrations
25	Promotion of Travel Choices
26	Taxi licencing conditions e.g. vehicle emission standards
27	Electric cycle/scooter hire scheme
28	Sustainable Procurement Guidance
29	Incentivise retrofitting scheme or upgrading of buses to low emission fuels

Table 4.4 – Additional Proposed Measures

Measure No.	Measure	Comments
30	Improved facilities for walking and cycling	Work on the Guildford LCWIP is due to commence shortly this year and, once complete, it will provide a strategic plan for a walking and cycling network across the borough. This LCWIP document will be used to bid for funding from central government and other sources to deliver the routes and improvements identified within the Plan, and the Plan’s primary routes (ranked on their propensity to increase walking and cycling amongst other criteria) will have been worked up to feasibility stage before the lifecycle of the AQAP is complete. Improving active travel infrastructure, with delivery aided by the implementation of the Guildford Borough LCWIP, should be included in this Plan’s list of suggested actions.
31	EV charging points	Provision of EV charging points at strategic locations around Guildford Town Centre and surrounding area to encourage the use of EVs.
32	Electric cycle hire scheme	Significant work undertaken to develop an electric bike scheme by GBC, however deferred and budget removed in 2020. SCC, as Local Transport Authority, are investigating the feasibility of an electric bike share scheme for Guildford.
33	Electric scooter hire scheme	An opportunity could be electric scooter hire to encourage commuters to travel by train or other alternatives to private vehicles and then pick-up scooter for last part of journey to workplace. Electric scooters only permitted as part of an approved Government trial, which are currently running elsewhere. So may need to wait until decision made on outcome of the trials.
34	Electric cargo bike hire scheme	Electric cargo bike hire could also be an opportunity. Cargo bikes have the potential to replace many journeys previously done by cars, such as shopping and are supported in the SCC LTP4.
35	Awareness of existing schemes: - of easitGuildford; and - Green Parking Permit.	Increased awareness of existing schemes would be beneficial.
36	Low traffic neighbourhoods	A measure suggested by SCC which aligns with LTP4 advocating for Liveable Neighbourhood schemes. These could be delivered in partnership with the SCC.

Each measure above has been scored 1 – 5 (going from worst to best, respectively) for a series of parameters, including cost to implement, timescale to implement, practical feasibility, deliverability, value for money, public buy-in, political buy-in and potential reductions to NO₂. In addition, GBC has a duty to work towards improving PM_{2.5} emissions and the potential reductions to PM_{2.5} for the measures have also been considered. An overall score was then calculated to enable the proposed measures to be ranked, in order to focus on the most useful measures to implement. The ranking and scores are set out in Table 4.5.

Included in Table 4.5 are ranked potential for NO₂ reductions based on experience. These are not based on quantitative modelled at this stage, although it is acknowledged that detailed modelling of some scenarios would be beneficial and will be investigated by GBC.

Table 4.5 – Options Matrix

Measure No.	Measure	Cost	Timescale	Practical Feasibility	Deliverability	Value for Money	Public Buy-in	Political Buy-in	NO ₂ Reduction	PM Reduction	Overall Score
1	A new bus-based park and ride	2	5	5	5	5	5	3	4	4	38
2	Road strategy schemes to tackle congestion on Strategic Road Network	5	4	2	3	3	5	5	3	3	33
3	Incident management and effective contingency planning to minimise traffic disruption and unnecessary congestion	4	3	2	3	3	5	5	4	4	33
4	Reduction of speed limits, 20 mph zones	5	5	3	5	2	4	5	2	2	33
5	Traffic control centre monitoring of traffic movement and providing real time traffic control over many traffic control installations	4	3	2	3	3	5	5	3	3	31
6	HGV ban around the gyratory during peak and interpeak hours.	4	4	2	4	3	3	3	4	4	31
7	Improve website information – Educational resources for schools	5	4	5	5	1	3	3	2	2	30
8	Schools air quality programme - monitoring, student air quality committee, educational materials, presentations	5	4	5	5	1	3	3	2	2	30
9	Promotion of cycling travel route maps to public	5	5	4	4	2	2	2	2	2	28
10	Promotion of low pollution route maps to public (walking)	5	5	4	4	2	2	2	2	2	28
11	Postcode air quality checker	5	5	5	5	2	1	3	1	1	28

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Measure No.	Measure	Cost	Timescale	Practical Feasibility	Deliverability	Value for Money	Public Buy-in	Political Buy-in	NO ₂ Reduction	PM Reduction	Overall Score
12	Air Alert system	3	4	5	5	2	3	4	1	1	28
13	Provide air quality information on current conditions in Guildford and what residents can do to help	5	5	5	5	1	1	2	2	2	28
14	Provide indoor air quality information and what residents can do to improve their conditions	5	5	5	5	1	1	2	2	2	28
15	Produce tools to assess traffic management schemes prior to implementation	3	3	3	3	3	3	3	1	3	25
16	Produce tool to evaluate measures to reduce traffic emissions	3	3	3	3	3	3	3	1	3	25
17	Provide a parking App to direct users to closest and cheapest spaces	4	4	2	4	1	4	4	2	2	27
18	Facilitate and promote home, mobile, remote and flexible working within the Council	5	5	4	4	3	1	3	1	1	27
19	Electric vehicle (EV) deliveries, local delivery hubs	2	2	3	2	3	3	3	5	4	27
20	A Clean Air Zones (CAZ) and/or Low Emission Zone (LEZ) for buses + HGVs	2	2	3	3	2	4	4	4	3	27
21	Anti-vehicle idling scheme e.g. At level crossings, taxi ranks, the station, bus stops and outside schools.	5	4	2	2	2	4	5	1	1	26
22	Bus stop clearways	4	2	3	2	3	3	3	2	3	25
23	Development of air quality supplementary planning guidance for developers	4	2	3	2	1	3	3	4	4	26

Measure No.	Measure	Cost	Timescale	Practical Feasibility	Deliverability	Value for Money	Public Buy-in	Political Buy-in	NO ₂ Reduction	PM Reduction	Overall Score
24	Improving modelling predictions of NO ₂ concentrations	4	4	4	5	2	2	2	2	1	25
25	Promotion of Travel Choices	5	5	3	4	1	1	2	2	2	25
26	Taxi licencing conditions e.g. vehicle emission standards	4	3	3	1	4	2	3	2	2	25
28	Sustainable Procurement Guidance	5	5	5	3	1	1	2	1	1	24
29	Incentivise retrofitting scheme or upgrading of buses to low emission fuels	3	2	3	2	2	3	3	3	3	24
30	Improved facilities for walking and cycling	3	3	3	4	1	5	5	2	2	27
31	EV charging points	2	3	3	3	3	5	5	3	3	30
32	Electric cycle hire scheme	3	4	3	3	3	5	4	3	3	31
33	Electric scooter hire scheme	3	4	4	4	3	4	3	3	3	31
34	Electric cargo bike hire scheme	3	4	4	3	3	4	4	2	2	29
35	Awareness of existing schemes: - of easitGuildford; and - Green Parking Permit.	5	5	4	5	4	5	5	2	2	37
36	Low traffic neighbourhoods	2	2	3	3	1	3	3	1	1	19
Note: Measure 27 has been replaced by 32 and 33.											

When considering which to implement, it is important to take into account whether they are likely to be viable economically within the timescales of achieving improvements. If measures will not have any effect until after 2027 then they will not help to revoke the AQMA. Table 4.6 sets out which authority would be responsible for each measure, the potential funding that may be utilised to implement each measure and the overall viability of achievement of each measure taking account of when each measure could lead to improvements within the AQMA. The measures that are not achievable have not been taken forward for further consultation (see Appendix A for further details).

Table 4.6 – Viability of Measures

Measure No.	Measure	Responsible Authority	Funding Potential	Viability of Achievement
1	A new bus-based park and ride	GBC own the land of existing sites. SCC setup and operate park and ride sites	Likely to be over £10 million to be confirmed. Land may need to be purchased.	Not achievable within time period due to funding, planning constraints, and physical constraints as old landfill site
2	Road strategy schemes to tackle congestion on Strategic Road Network	SCC and National Highways. GBC as part of Town Centre Masterplan	Not able to estimate	Not achievable within the time period. The Masterplan is unlikely to be in place before 2025
3	Incident management and effective contingency planning to minimise traffic disruption and unnecessary congestion	SCC and National Highways	Not able to estimate but likely viable	Potentially achievable. Reliant on both highway authorities.
4	Reduction of speed limits, 20 mph zones	SCC	Not able to estimate	Potentially achievable
5	Traffic control centre monitoring of traffic movement and providing real time traffic control over many traffic control installations	SCC	Not able to estimate	Not achievable within the time period. The Masterplan is unlikely to be in place before 2025
6	HGV ban around the gyratory during peak and interpeak hours.	SCC	Not able to estimate	Potentially achievable within timescale after feasibility studies.
7	Improve website information – Educational resources for schools	SCC and Private Sector	Likely to be less than £5,000	Potentially achievable and will add to current work on Eco Schools and travel plans
8	Schools air quality programme - monitoring, student air quality committee, educational materials, presentations	SCC and Private Sector. Four schools close to town centre, three colleges and the university.	Likely to be less than £10,000 initially	Potentially achievable will add to current work on Eco Schools and travel plans
9	Promotion of cycling travel route maps to public	SCC and GBC	Likely to be less than £5,000	Potentially achievable, should be removed to be included in the Guildford Air Quality Strategy 2023-2028 as a permanent measure It is a long term measure it
10	Promotion of low pollution route maps to public (walking)	SCC and GBC	Likely to be less than £5,000	Potentially achievable, should be removed to be included in the Guildford Air Quality Strategy 2023-2028 as a permanent measure Potentially achievable

Measure No.	Measure	Responsible Authority	Funding Potential	Viability of Achievement
11	Postcode air quality checker	GBC	Likely to be less than £5,000	Potentially achievable, should be removed to be included in the Guildford Air Quality Strategy 2023-2028 as a permanent measure Potentially achievable
12	Air Alert system	GBC	Not likely unless part of long-term monitoring of AQAP	Not achievable as unlikely to resource an automatic monitoring station
13	Provide air quality information on current conditions in Guildford and what residents can do to help	GBC	Likely to be less than £5,000.	Potentially achievable, should be removed to be included in the Guildford Air Quality Strategy 2023-2028 as a permanent measure.
14	Provide indoor air quality information and what residents can do to improve their conditions	GBC	Likely to be less than £5,000.	Potentially achievable, should be removed to be included in the Guildford Air Quality Strategy 2023-2028 as a permanent measure.
15	Tools to assess traffic management schemes prior to implementation	SCC	Not able to estimate	Potentially achievable
16	Produce tool to evaluate measures to reduce traffic emissions	SCC	Not able to estimate	Potentially achievable, should be removed to be included in the Guildford Air Quality Strategy 2023-2028 as a permanent measure Potentially achievable
17	Provide a parking App to direct users to closest and cheapest spaces	GBC	Not able to estimate	Potentially achievable
18	Facilitate and promote home, mobile, remote and flexible working within the Council	GBC	Likely to be less than £5,000	Potentially achievable
19	Electric vehicle (EV) deliveries, local delivery hubs	GBC, SCC and National Highways	Not able to estimate	Potentially achievable
20	A Clean Air Zones (CAZ) and/or Low Emission Zone (LEZ) for buses + HGVs	SCC	Likely to be more than £5,000,000	Potentially achievable
21	Anti-vehicle idling scheme e.g. At level crossings, taxi ranks, the station, bus stops and outside schools.	GBC and SCC	Not able to estimate	Potentially achievable
22	Bus stop clearways	SCC	Not able to estimate	Potentially achievable

Measure No.	Measure	Responsible Authority	Funding Potential	Viability of Achievement
23	Development of air quality supplementary planning guidance for developers	GBC	From GBC policy	Potentially achievable
24	Improving modelling predictions of NO ₂ concentrations	GBC and SCC	Likely to be less than £10,000	Potentially achievable
25	Promotion of Travel Choices	GBC and SCC	Not able to estimate	Not achievable as unlikely to provide improvement within time period
26	Taxi licencing conditions e.g. vehicle emission standards	GBC, SCC, and other authorities	From Defra but has been revised	Potentially achievable
28	Sustainable Procurement Guidance	GBC and SCC	No additional funding required	Potentially achievable, should be removed to be included in the Guildford Air Quality Strategy 2023-2028 as a permanent measure Achievable
29	Incentivise retrofitting scheme or upgrading of buses to low emission fuels	SCC	Is subject to Subsidy Control Act 2022 controls.	Potentially achievable, however it
30	Improved facilities for walking and cycling	GBC, SCC and National Highways	Not able to estimate	Potentially achievable
31	EV charging points	GBC, SCC and National Highways	Not able to estimate	Potentially achievable
32	Electric cycle hire scheme	SCC for a town-wide scheme	Not able to estimate,	Potentially achievable
33	Electric scooter hire scheme	SCC for a town-wide scheme	Not able to estimate	Potentially achievable, although subject to Government legality outcome from trial.
34	Electric cargo bike hire scheme	GBC, SCC and Private Companies	Corporate programmes. May be opportunity in near future for Government scheme. Private companies operate schemes in other cities in England and internationally successfully	Potentially achievable.
35	Awareness of existing schemes: - of easitGuildford; and - Green Parking Permit.	GBC	Likely to be less than £5,000	Potentially achievable
36	Low traffic neighbourhoods	GBC, SCC and National Highways	Not able to estimate	Potentially achievable

Measures which scored above 25 and are considered viable in the timeframe have been taken forwards. In addition to viability of measures, any measure which is viable but scores less than 3 in terms of potential for NO₂ reduction has been excluded from the specific measures list which are considered to be part of the Environment Act 2021 requirements for 'particular measures', however, they are included in a complementary measure list not part of the set of particular measures.

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5 AQAP Measures

Following consultation with relevant authorities, stakeholders and consultees, a number of measures have been considered by as being appropriate for taking forward to assist with revoking the AQMA. These measures are considered to have the greatest potential for NO₂ reductions within the AQMA, most likely to be viable within the timeframe required and score highest when considering the range of factors set out in Table 4.5. These measures form the set of ‘particular measures’ required to achieve and maintain the air quality standards and objectives within the AQMA as prescribed in the Environment Act 2021. These primary measures are set out in Table 5.1.

In addition to these measures, a set of complementary measures which may be viable but have a lesser potential to reduce NO₂ concentrations in the AQMA are set out in Table 5.2. These measures should be considered where possible to supplement primary measures set out in Table 5.1.

The measures that have been considered and not pursued or are to be included in the next Guildford Air Quality Strategy 2023-2028 are set out in Appendix A.

When considering the advantages of measures, an important factor has been to take account of co-benefits with other environmental factors, particularly the county council’s Climate Change Strategy and Climate Change Delivery Plan which are both very relevant local policy documents that touch upon air quality.

When considering the measures, it is important to note that there are some procedures already in place that should be utilised to assist with minimising air pollution and are thus not action plan measures. In particular, this includes development control. Proposed development which delay achieving or prevents GBC from maintaining compliance with the air quality standards and objectives will be considered poor development and are unlikely to be permitted. In addition, any stationary combustion plant located within 500 m of the AQMA should be considered to ensure the impact on the AQMA is minimised. Existing and new plant greater than 1MW_{th} input should be controlled by the Environmental Agency. All new plant should be designed to optimise dispersion and minimise impacts on the AQMA.

5.1 Primary measures

Measures are discussed, including limitations, in the text after the table. Many of the measures require further work by GBC to design the final implementation of the measure to ensure that it is most effective at reducing NO₂ concentrations within the AQMA.

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Table 5.1 – Primary Air Quality Action Plan Measures

Measure No.	Measure	Measure Category	Lead Authority	Planning Phase	Implementation Phase	Deliverable Date	Comments
3	Incident management and effective contingency planning to minimise traffic disruption and unnecessary congestion	Traffic Management	SCC	2023	2023-2024	2025	Work with National Highways
6	HGV ban around the gyratory during peak and interpeak hours ^a	Freight and Delivery Management	SCC	2023	2023-2025	2026	Requires full feasibility study.
19	Electric vehicle (EV) deliveries, local delivery hubs ^a	Promoting Low Emission Transport	GBC	2023	2024-2025	2026	GBC or private land. Will need to go through planning development.
20	A Clean Air Zones (CAZ) and/or Low Emission Zone (LEZ) for buses + HGVs ^a	Promoting Low Emission Transport	SCC	2023	2024-2025	2026	Requires full feasibility study.
23	Development of air quality supplementary planning guidance for developers	Policy Guidance and Development Control	GBC	2022	2023	2023	Development management policies in Local Plan process
31	EV charging points at residential and destinations	Promoting Low Emission Transport	SCC (on-street parking) and GBC (off-street car parks)	2022	2022-2023	2023 onwards	SCC on street in progress. GBC to work within the authority
32	Electric cycle hire scheme	Promoting Travel Alternatives	GBC	2023	2022-2023	2024	Requires full feasibility study.
33	Electric scooter hire scheme	Promoting Travel Alternatives	GBC	2023	2023-2024	2024, subject to change in legislation	Requires full feasibility study.

5.1.1 Incident management and effective contingency planning to minimise traffic disruption and unnecessary congestion

The measure will aim to reduce congestion by proactively managing incidents and traffic disruption.

This is a popular action and will be parallel to the A3 consultation and the Masterplan and aligns with the LTP4 Vision Zero measures.

5.1.2 HGV ban around the gyratory during peak and interpeak hours

Banning heavy goods vehicles (HGVs) from travelling through the gyratory and adjacent roads during peak and interpeak hours (7:30 am to 6:30 pm) could help reduce emissions from HGVs in the town centre, which currently account for approximately 10% of all emissions. The zone proposed would need to account for a wide range of factors, such as turnaround locations, all of which would be addressed at a later stage with feasibility studies.

5.1.3 EV deliveries, local delivery hubs

Light goods vehicles (LGVs) accounts for approximately 10% of all emissions in the town centre. This measure aims to reduce these emissions through introduction of electric LGVs schemes and local final mile delivery hubs using EVs.

To make this viable electric charging LGV hubs would be needed along the key arterial routes in Guildford, including near the A3.

In addition, it could be beneficial to have local delivery hubs that include electric charging infrastructure. These hubs would enable large HGV deliveries to be transferred to electric LGVs, for cleaner deliveries within the town centre. While there are potentially many locations where local hubs could be developed, Guildford is possibly not large enough to support a depot of size that would be needed. This measure may need to work in combination with a Clean Air Zone (CAZ) or Low Emission Zone (LEZ).

5.1.4 CAZ/LEZ

CAZs and LEZs have been implemented in several cities recently (Bath, Birmingham, Greater London, Oxford, etc.) and proposed for many more. A zone could be utilised to achieve improvements in the town centre.

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The key focus of a zone would be to limit high emission vehicles travelling through the gyratory, where the worst exceedances within the AQMA occur.

Around the gyratory buses/coaches and HGVs account for about 22-33% of emissions and taxis for less than 5%. It is understood that the existing bus/coach fleet in the town centre is old and likely has high emission rates. Consideration would need to be given to which buses could meet criteria and impact on operators and alternative routes. Similarly, old HGVs typically have high emission rates. The taxis are also understood to be fairly old. Vans and minibuses (i.e. LGVs) also account for around 10% of emissions. Private cars account for approximately 30-35% of emissions alone and charging cars could therefore lead to a large improvement in air quality. Charging private cars would, however, have economic impacts on those more deprived and would need further consideration of the wider impacts.

Any zone proposed would need to account for a wide range of factors, such as turnaround locations, all of which would be addressed at a later stage with feasibility studies.

5.1.5 Development of air quality supplementary planning guidance for developers

The development of air quality guidance for developers submitting planning applications could help to minimise emissions from new developments in Guildford.

This would need to include consideration of many aspects, including personalised travel plans, a construction vehicle (low emission) / Non-Road Mobile Machinery (NRMM) database, and EV deliveries.

This measure would be intended to build upon draft Policy P11: Air Quality and Air Quality Management Areas in the Local Plan Development Management Policies (LPDMP), which is not likely to be adopted until March 2023 at the earliest. Any guidance would need to supplement this policy and could only be adopted after the LPDMP in 2023.

Informal guidance could be utilised sooner. It would have no planning weight but may be useful as a form of 'operational advice'. Resource would be required for preparation of guidance, consultation, committee process, and would be competing against other corporate priorities for new Planning Policy documentation, such as Review of Local

Plan, town centre Area Action Plan, new SPD's already signalled in adopted and emerging Local Plans, etc.

5.1.6 EV charging points

Provision of a good network of publicly accessible EV charging points around the town centre and also at locations near public transport hubs would be beneficial to encourage the use of EV. The charging points can be on public or private land, but should also be accessible to all users including commercial vehicles. This measure is particularly effective in combination with an emission control zone (e.g. CAZ or LEZ).

5.1.7 Electric cycle hire scheme

A Brompton bike hire scheme is in operation at the main rail station and there is also a small bike share scheme in operation at the University of Surrey. These are both run by third parties. Significant work has already been undertaken on delivery of an electric bike scheme by GBC, however this was deferred and budget removed in 2020. SCC, as Local Transport Authority, are investigating the feasibility of an electric bike share scheme for Guildford.

5.1.8 Electric scooter hire scheme

Electric scooters are currently only permitted as part of an approved Government trial, which are currently running elsewhere (other cities). The use of electric scooters is understood to be successful in cities such as Bristol, however, there is a need to wait until decision made on outcome of the Government trials and legislation brought forward to legalise their use on public roads.

If the trials are successful there is a good opportunity for electric scooters to be located across the town centre including based at the main railway station, helping to minimise emissions. The existing schemes in the trial are run by 3rd parties and are self-funding (i.e. low cost). This measure is likely to have positive effect in town centre if the Government trial is successful and could help as part of a wider package of measures.

5.2 Further work

GBC are committed to carrying out further work on the likely effectiveness of the primary measures to determine the feasibility of each measure and in line with the

updates to Section 11 of the Environment Act 2021, GBC will update and review the AQAP to ensure effective and viable measures are implemented.

Furthermore GBC are committed to working in partnership with other stakeholders such as Surrey Country Council and National Highways.

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5.3 Complementary measures

The table below contains measures which will complement those listed as primary and will serve as additional options for minor improvements. These measures are unlikely to be sufficient to reduce the nitrogen dioxide levels except in combination with one or several primary actions.

Table 5.2 – Complementary Air Quality Action Plan Measures

Measure No.	Measure
4	Reduction of speed limits, 20 mph zones
7	Improve website information – Educational resources for schools
8	Schools air quality programme - monitoring, student air quality committee, educational materials, presentations
15	Produce tools to assess traffic management schemes prior to implementation
16	Produce tool to evaluate measures to reduce traffic emissions
17	Provide a parking App to direct users to closest and cheapest spaces
21	Anti-vehicle idling scheme e.g. At level crossings, taxi ranks, the station, bus stops and outside schools.
22	Bus stop clearways
30	Improved facilities for walking and cycling
34	Electric cargo bike hire scheme
35	Awareness of existing schemes: - of easitGuildford; and - Green Parking Permit.

Appendix A: Reasons for Not Pursuing Action Plan Measures

Table A1: Action Plan Measures Not Pursued and the Reasons for that Decision

Measure No.	Action category	Action description	Reason action is not being pursued (including Stakeholder views)
1	Alternatives to Private Vehicle Use	Bus based park and ride	The bus-based park and ride is not seen as an achievable action that will be completed by 2025. It will require over £10 million of funding to be completed, it will likely encounter planning constraints during the planning process and the site previous use was a landfill site that will offer physical constraints to the site.
2	Traffic Management	Road strategy schemes to tackle congestion on Strategic Road Network	The Town Centre Masterplan is unlikely to be implemented before 2025. The implementation of a changing road strategy will not likely be achievable by 2025 as the Masterplan will be required.
5	Traffic Management	Traffic control centre monitors traffic movement and provides real time traffic control over many traffic control installations	The Town Centre Masterplan is unlikely to be implemented before 2025. The implementation of a changing road strategy will not likely be achievable by 2025 as the Masterplan will be required.
12	Public Information	Air Alert	GBC do not have the resources for a network of automatic monitoring stations for the period up to 2025.
25	Promoting Travel Alternatives	Promotion of Travel Choices	The action of promoting travel choices is seen as unlikely to make a significant impact within the administrative area of GBC within the relevant time period. The impact of other suggested measures compared to promoting travel choices will likely be greater.

28	Policy Guidance and Development Control	Sustainable Procurement Guidance	Overall ranking score was not sufficiently high enough to justify further direct benefits on the AQMA.
29	Vehicle Fleet Efficiency	Incentivise retrofitting scheme or upgrading of buses to low emission fuels	Currently there is a long lead time on such schemes and as such is unlikely to be achievable within the time period for action.
36	Promoting Travel Alternatives	Low traffic neighbourhoods	Potential benefit in residential areas but unlikely to provide any significant benefit to air pollution within the AQMA.
MEASURES TO BE INCLUDED IN FUTURE STRATEGIES AS PERMANENT			
10	Public Information	Promotion of low pollution route maps to public (walking)	Considered to be a more appropriate measure in an air quality strategy
11	Public Information	Postcode air quality checker	Considered to be a more appropriate measure in an air quality strategy.
13	Public Information	Provide air quality information on current conditions in Guildford and what residents can do to help	Considered to be a more appropriate measure in an air quality strategy.
14	Public Information	Provide indoor air quality information and what residents can do to improve their conditions	Considered to be a more appropriate measure in an air quality strategy.

24	Policy Guidance and Development Control	Improving modelling predictions of NO ₂ concentrations	Considered to be a more appropriate measure in an air quality strategy.
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Appendix B: Glossary of Terms

Abbreviation	Description
APS	Air Pollution Services
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
AQS	Air Quality Strategy
ASR	Air quality Annual Status Report
CAZ	Clean Air Zone
Defra	Department for Environment, Food and Rural Affairs
EU	European Union
HGV	Heavy Goods Vehicle
LAQM	Local Air Quality Management
LGV	Light Goods Vehicle
NH	National Highways
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
PM _{2.5}	Fine particulate matter of less than 2.5 micrometres in diameter
SCC	Surrey County Council

Appendix C: References

- APS. (2021). *Guildford Borough Council: Air Quality Detailed Assessment, Report Reference: L1002_A_5*.
- Barnes, J., Chatterton, T., & Longhurst, J. (2019). *Emissions vs exposure: Increasing injustice from road traffic-related air pollution in the United Kingdom. Transportation Research Part D: Transport and Environment, 73*, 56-66. <https://doi.org/10.1016/j.trd.2019.05.001>.
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- Defra. (2006). *Air Quality and Social Deprivation in the UK: an environmental inequalities analysis*.
- Defra. (2013). *Abatement cost guidance for valuing changes in air quality*.
- Defra. (2019). *Clean Air Strategy*. Retrieved from <https://www.gov.uk/government/publications/clean-air-strategy-2019>
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- HM Government. (2019). *A Green Future: Our 25 Year Plan to Improve the Environment*.
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- Wheeler, B. W.-S. (2005). Environmental equity, air quality, socioeconomic status, and respiratory health: a linkage analysis of routine data from the Health Survey for England. *J Epidemiol Community Health, 59*:948–954. doi: 10.1136/jech.2005.036418.
- APS. (2021). *Guildford Borough Council: Air Quality Detailed Assessment, Report Reference: L1002_A_5*.
- Barnes, J., Chatterton, T., & Longhurst, J. (2019). *Emissions vs exposure: Increasing injustice from road traffic-related air pollution in the United Kingdom. Transportation Research Part D: Transport and Environment, 73*, 56-66. <https://doi.org/10.1016/j.trd.2019.05.001>.
- COMEAP. (2018). *Associations of long-term average concentrations of nitrogen dioxide with mortality*. Retrieved from <https://www.gov.uk/government/publications/nitrogen-dioxide-effects-on-mortality>
- Defra. (2006). *Air Quality and Social Deprivation in the UK: an environmental inequalities analysis*.
- Defra. (2013). *Abatement cost guidance for valuing changes in air quality*.
- Defra. (2019). *Clean Air Strategy*. Retrieved from <https://www.gov.uk/government/publications/clean-air-strategy-2019>
- HM Government. (2017). *Industrial Strategy: Building a Britain fit for the future*.
- HM Government. (2018). *The Clean Growth Strategy: Leading the way to a low carbon future*.
- HM Government. (2019). *A Green Future: Our 25 Year Plan to Improve the Environment*.
- HMSO. (1995). *Environment Act*. HMSO.
- HMSO. (2021). *Environment Act*.
- Wheeler, B. W.-S. (2005). Environmental equity, air quality, socioeconomic status, and respiratory health: a linkage analysis of routine data from the Health Survey for England. *J Epidemiol Community Health, 59*:948–954. doi: 10.1136/jech.2005.036418.

We'd like to find out your views on our draft Air Quality Action Plan (AQAP) Your answers will be used to help us develop our final AQAP which, if approved by our Joint Committee in October 2022, will go to the Department for Environment, Food and Rural Affairs (DEFRA) for approval.

An Air Quality Management Area (AQMA) Guildford town centre was approved in October 2021 following a breach of the air quality standard for nitrogen dioxide. A detailed air quality assessment concluded that this was down to emissions from road traffic. You can visit the Defra website for more information on the AQMA. [AQMAs interactive map \(defra.gov.uk\)](https://www.defra.gov.uk/air-quality/aqma/)

Our AQAP sets out measures for further investigation with the aim of tackling this problem and achieving national air quality objectives in this area. Once the AQAP is finalised, we will carry out studies to determine the feasibility of implementing the selected measures and, if necessary, carry out further consultations.

GDPR info?

1. Which answer best represents you?

Resident	
I work in the area	
Parish council	
Organisation or business	
Local sports or activity club	
Student	
Local charity organisation	
I live outside Guildford borough	
I live in Guildford	
Other – please specify	

2. Please provide the first part of your postcode. Eg GU1

3. If your business is based in Guildford, please provide the first part of the postcode for your business address. Eg GU1

4. Age group

16-24	
25-34	

35-44	
45-54	
55-64	
65+	
Prefer not to say	

5. What is your most frequent mode of transport (car, bus, train, walk) and reason for travel (work, school etc.)?

Mode of transport	
Reason for travel	

6. Are you aware of any of the following current initiatives, which aim to reduce air pollution in the borough?

	Yes	No
easitGuildford- a green travel network launched in 2019, providing benefits to encourage businesses and employees to take up more sustainable travel options.		
Electric buses- nine electric buses serve the Park and Ride sites.		
Surrey Air Alliance of local authorities, this includes: <ul style="list-style-type: none"> • a schools education project • a grant to fund the introduction of electric taxis 		
Green Parking Scheme- enables electric vehicle owners to obtain a free parking permit and discounted parking in the GBC car parks.		
Project Aspire- which aims to protect the health and wellbeing of Guildford residents and reduce social inequality.		
The electric vehicle charging network.		
Improvements to cycle networks in the Borough for example the Guildford to Godalming link.		
Land use planning: Planning requirement for Air quality assessments of medium/large scale developments.		

Planning conditions for EV charging facilities in the allocated/shared car park of proposed development		
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7. To what extent do you agree that the following actions to improve air quality should be included in our Air Quality Action Plan?

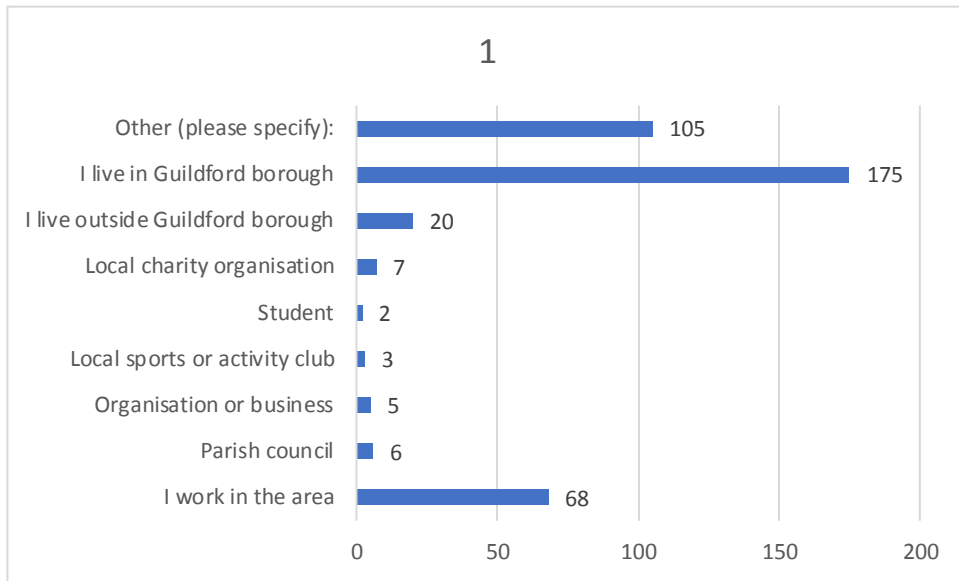
	Strongly agree	Agree	Neutral	Disagree	Strongly Disagree
<p>Reduction of speed limits, 20mph zone Introducing a 20mph speed limit across an area from the railway bridge on the A322 in the north, to the junction with Quarry Street and the A281 in the south, and from the Egerton Road/A3 junction in the west to the London Road/Clandon Road junction in the east.</p>					
	Strongly agree	Agree	Neutral	Disagree	Strongly disagree
<p>HGV ban around the gyratory during peak and interpeak hours Banning heavy goods vehicles (HGVs) from travelling through the AQMA during the hours 07.30 to 18.30. (Local access for deliveries is exempt)</p>					
	Strongly agree	Agree	Neutral	Disagree	Strongly disagree
<p>Electric Vehicle deliveries, local delivery hubs Setting up local hubs to enable deliveries to be made by low emission vehicles</p>					
	Strongly agree	Agree	Neutral	Disagree	Strongly disagree
<p>Anti-vehicle idling measures Ensuring that stationary vehicles in areas most at risk do not leave engines idling.</p>					

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree
<p>Introduce a Clean Air Zone A Clean Air Zone is a specific location that aims to reduce public exposure to nitrogen dioxide through:</p> <ul style="list-style-type: none"> • restrictions on the highest polluting vehicles • encouraging the use of cleaner vehicles • encouraging people to walk, cycle or use public transport <p>Clean Air Zones bring together:</p> <ul style="list-style-type: none"> • Immediate action to improve air quality and health • Support local growth and ambition • a change to a low emission economy • The introduction of access restrictions to encourage cleaner vehicles 					

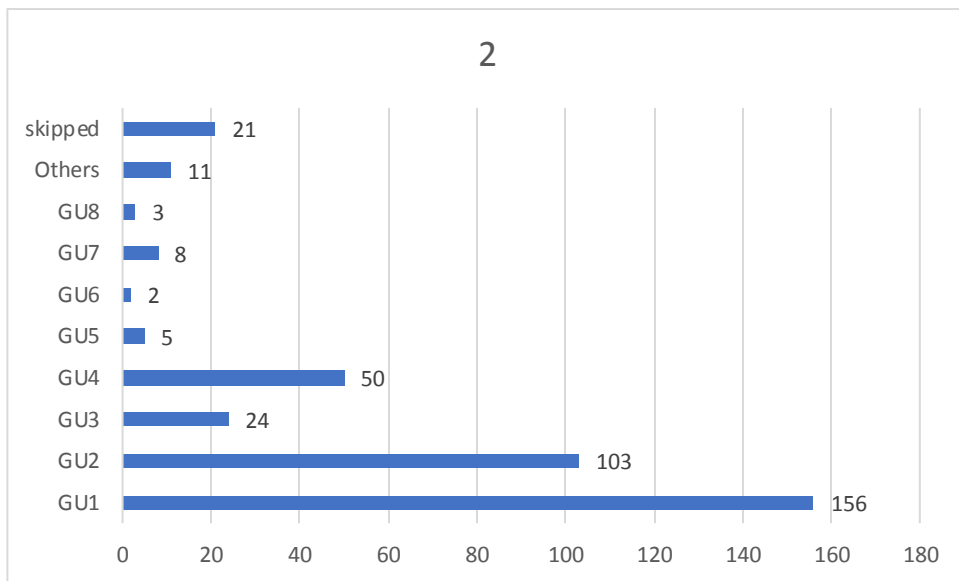
8. Please use the space below to tell us if there any other measures you feel the council should be taking to improve air quality which are currently not included in the draft air quality action plan?

Appendix 4
Draft Air Quality Action Plan Results of Public Consultation Online Survey

1. Which description best describes you?

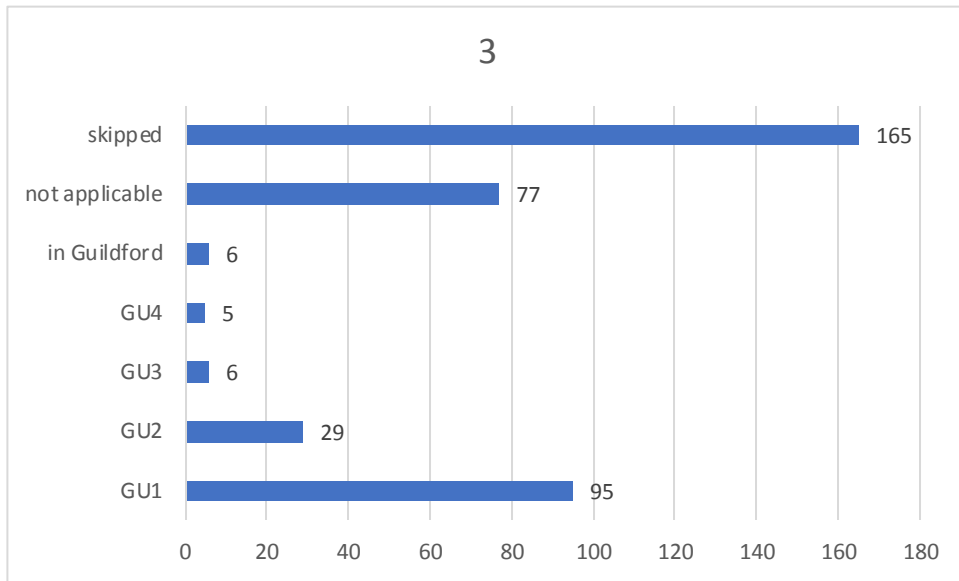


2. Please provide the first part of your postcode, for example GU1.

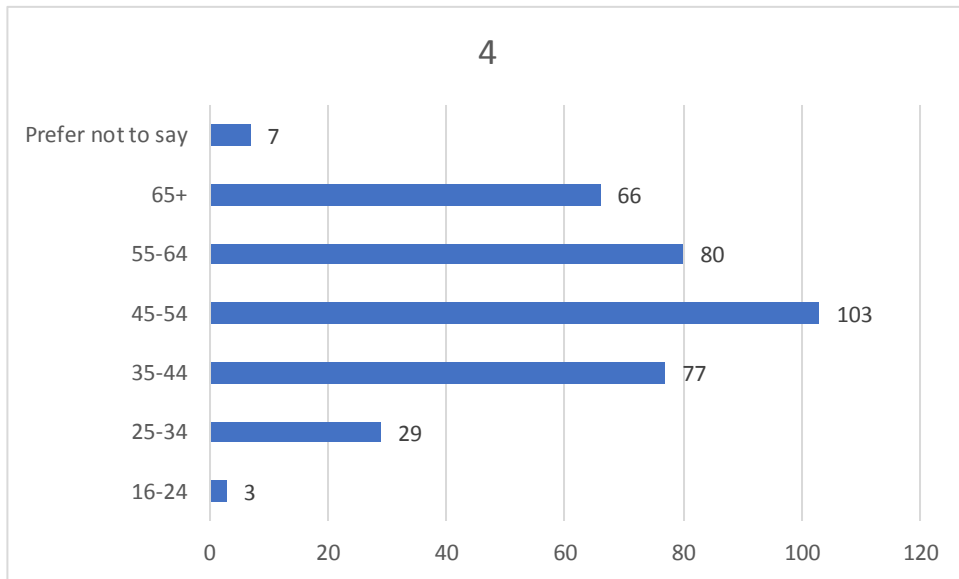


Appendix 4
Draft Air Quality Action Plan Results of Public Consultation Online Survey

3. Location of businesses:

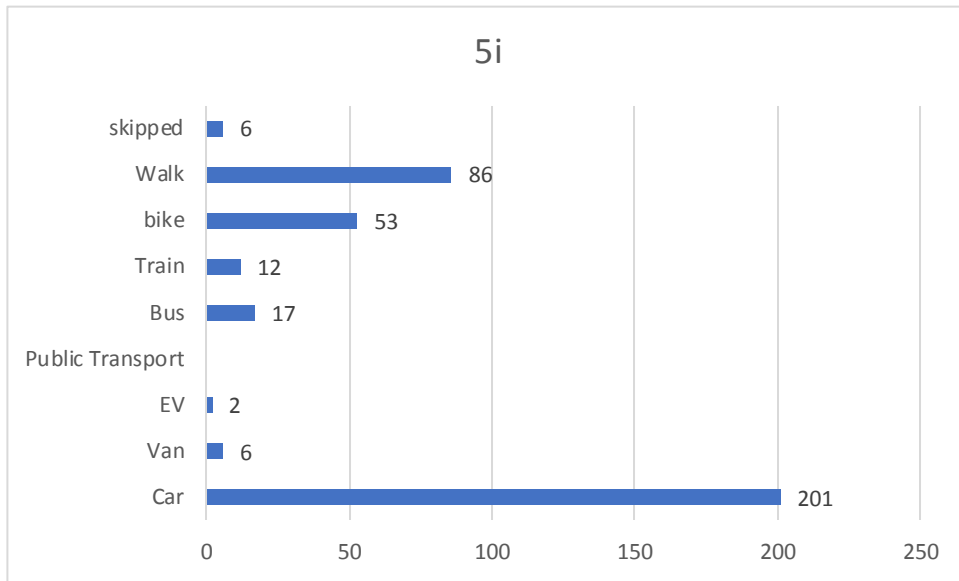


4. Please confirm your age group:

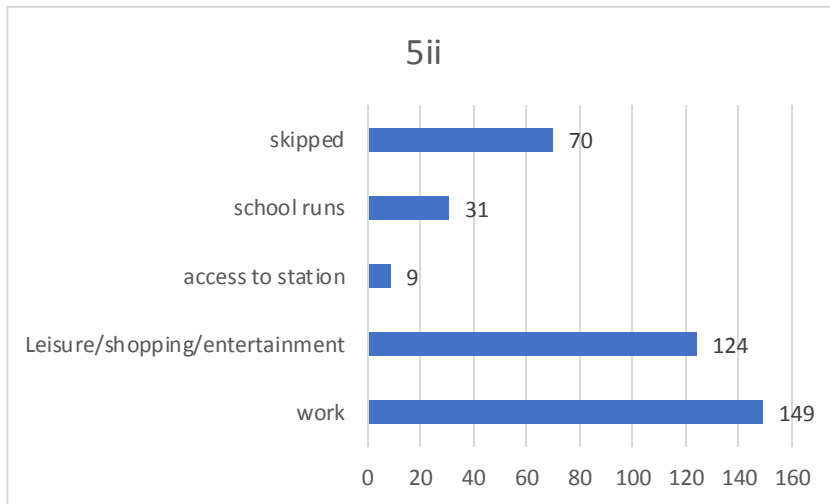


Appendix 4
Draft Air Quality Action Plan Results of Public Consultation Online Survey

5. i) Mode of transport:

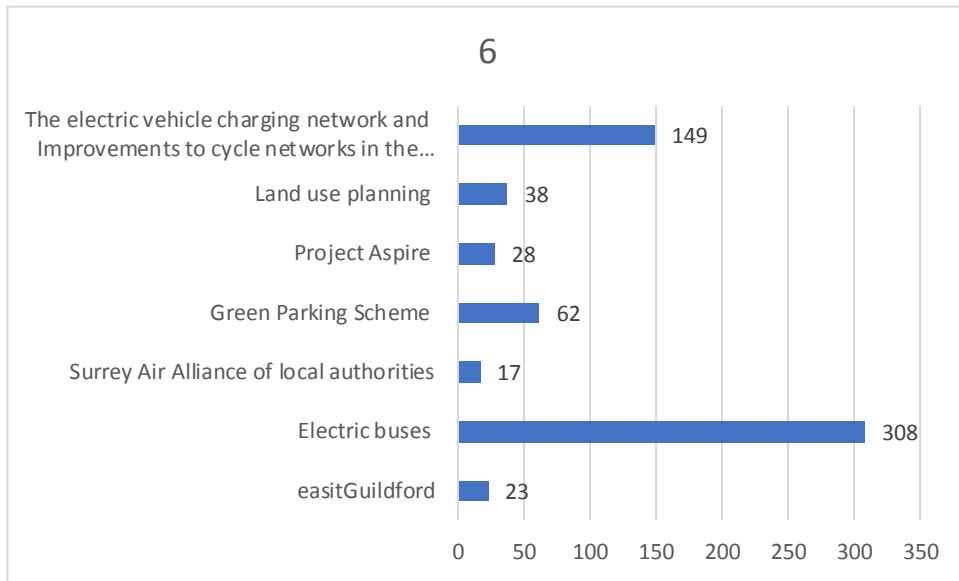


5. ii) Purpose of travel/reason for travelling in Guildford:



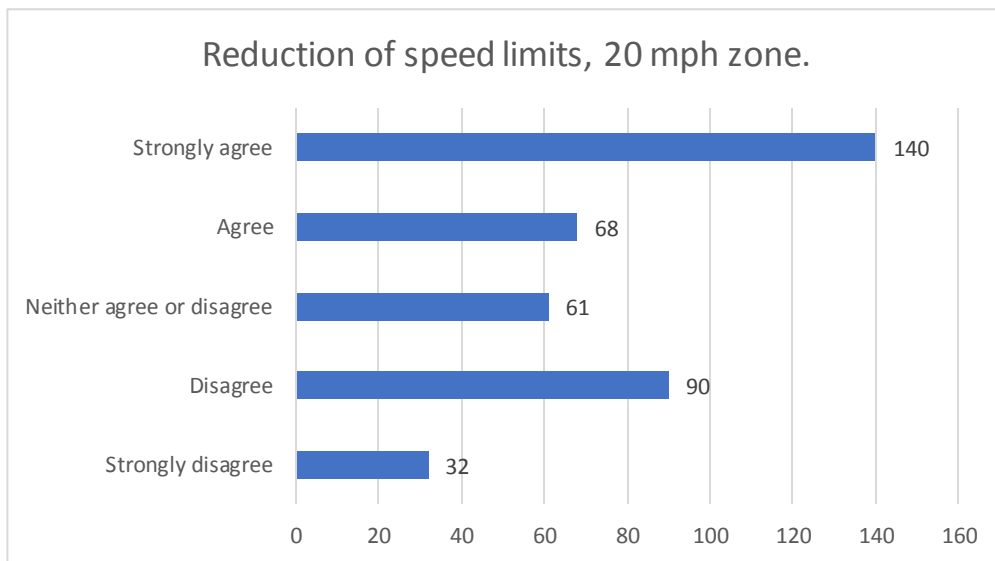
Appendix 4
 Draft Air Quality Action Plan Results of Public Consultation Online Survey

6. Please tick the current air pollution reduction initiatives you are aware of:

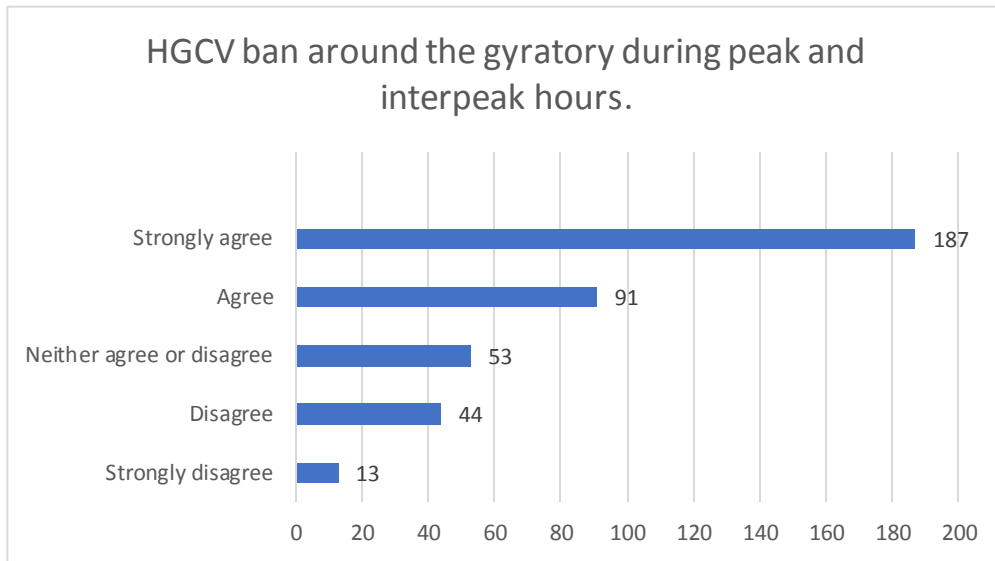


7. To what extent do you agree that the following actions to improve air quality should be included in our Air Quality Action Plan?

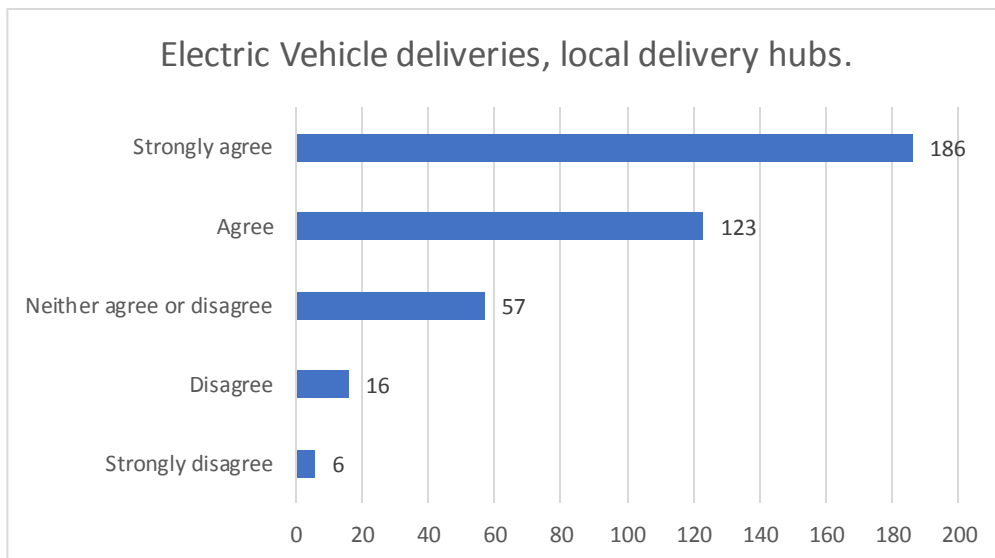
Reduction of speed limits, 20mph zone.



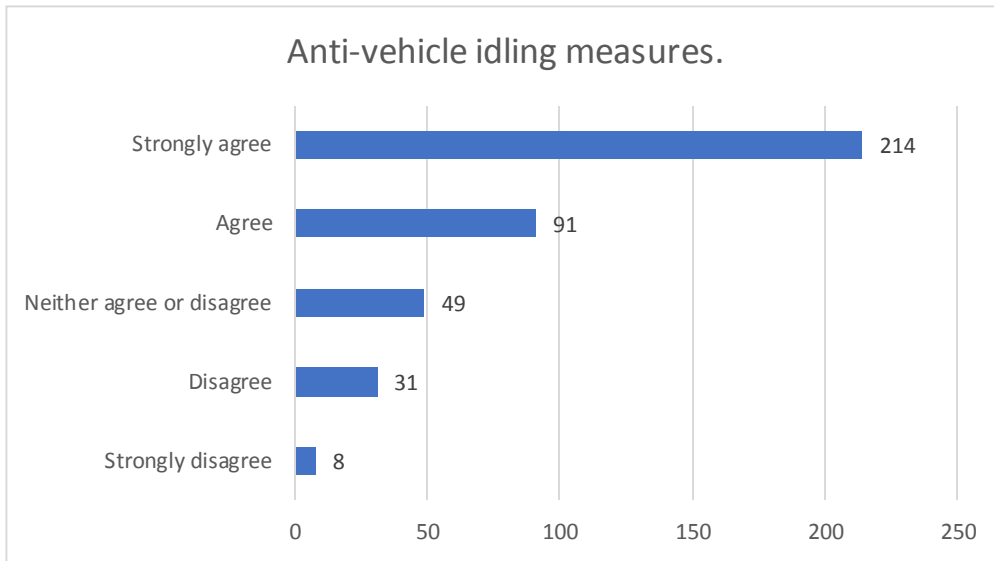
HGV ban around gyratory during peak and interpeak hours.



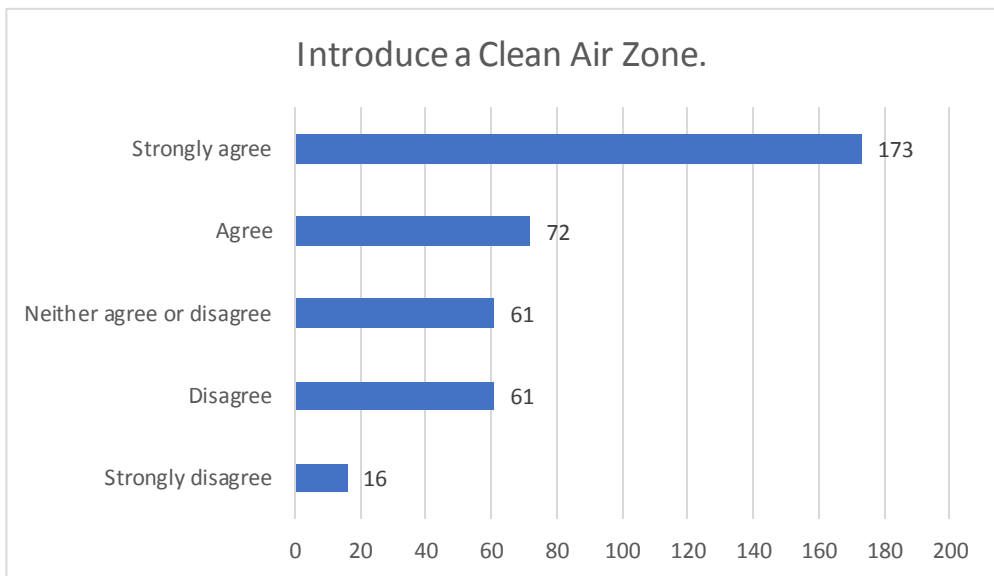
Electric Vehicle deliveries, local delivery hubs.



Anti-vehicle idling measures.



Introduce a Clean Air Zone.



7. To what extent do you agree that the following actions to improve air quality should be included in our Air Quality Action Plan?						
Answer Choices	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly Disagree	Response Total
Reduction of speed limits, 20mph zone. Introducing a 20mph speed limit across an area from the railwaybridge on the A322 in the north, to the junction with Quarry Street and the A281 in the south, and from the Egerton Road/A3 junction in the west to the London Road/Clandon Road junction in the east.	35.81% 140	17.39% 68	15.60% 61	23.02% 90	8.18% 32	391
HGV ban around the gyratory during peak and interpeak hours. Banning heavy goods vehicles (HGVs) from travelling through the AQMA during the hours 07.30 to 18.30. (Local access for deliveries is exempt).	48.20% 187	23.45% 91	13.66% 53	11.34% 44	3.35% 13	388
Electric Vehicle deliveries, local delivery hubs. Setting up local hubs to enable deliveries to be made by low emission vehicles.	47.94% 186	31.70% 123	14.69% 57	4.12% 16	1.55% 6	388
Anti-vehicle idling measures. Ensuring that stationary vehicles in areas most at risk do not leave engines idling.	54.45% 214	23.16% 91	12.47% 49	7.89% 31	2.04% 8	393
Introduce a Clean Air Zone which is a specific location to improve air quality and health, support local growth and ambition, a change to a low emission economy and introduce access restrictions to encourage cleaner vehicles. It reduces public exposure to nitrogen dioxide through restrictions on the highest polluting vehicles, encouraging the use of cleaner vehicles, encouraging people to walk, cycle or use public transport.	45.17% 173	18.80% 72	15.93% 61	15.93% 61	4.18% 16	383

7. To what extent do you agree that the following actions to improve air quality should be included in our Air Quality Action Plan?

	skipped
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Other comments received in free text

Subject	Approximate number of comments	Issues raised (selected extracts) Where applicable the same comment is in two or more categories
Cycling and network	80	<ul style="list-style-type: none"> • Not very good network • Bike lanes, compromised by vehicles parked • Cycle ways tend to start and end suddenly and are too open to the roads • More priority to cars on roads than bike • The cycle route from Guildford city centre up the mount and onto the hogs back is unusable. I think it's classed as a national cycle path (no 21) but is impassable for all but the most robust off road bicycles. Bikes using the A31 Farnham Road create huge slow moving tailbacks, especially at peak times (creating excessive and incessant pollution) • Secure bike parkings • Bikes for hire facilities • Godalming to Guildford link unfinished by the Shalford waterworks • A major cycling improvement needed is replace the pedestrian bridge that spans the A3 by the Wooden Bridge Pub. • Implement the Sustainable Transport Corridor • Install cycle specific traffic lights at traffic light junctions to prioritise cyclists, as is so successful in central London
Traffic and 20 mph zones	50	<ul style="list-style-type: none"> • Traffic lights are poorly timed on gyratory causing queues • Resident who lives on 20mph road, would prefer less traffic rather than same amount of vehicles doing 20mph • Restore Debenhams underpass. • Guildford Bypass; alternative route to reach the Guildford station • Residents along A3 bypass/Westborough/Dennis RA are worst affected; what actions for them • 50 mph on A3 should continue all the way up to stoke interchange • Replan central gyratory • Include Shalford in the 20mph zone and HGV ban • Install cycle specific traffic lights at traffic light junctions to prioritise cyclists, as is so successful in central London • In Recreation, Stocton and Josephs Rd, areas 20MPH approved signs to go up in 2022-3 budget

Subject	Approximate number of comments	Issues raised (selected extracts) Where applicable the same comment is in two or more categories
Electric scooters and bikes	30	<ul style="list-style-type: none"> • Introduce, but learn from other cities re positioning and operation • Use for takeaway deliveries
Buses and public transport	60	<ul style="list-style-type: none"> • Electric buses to be encouraged • Expensive; frequency; • Subsidy on bus travel • Slowing traffic and unused bus lanes for 49 minutes per hour and 24 hour bus lanes when no buses run between 23:00 and 06:00 is simply revenue raising and nothing to do with pollution. • Incentive schemes for use of bus service • Low cost circular bus routes • App for bus users • 17 years ago, moved in Guildford and the developer gave free bus passes
Walking and pedestrian routes	20	<ul style="list-style-type: none"> • No safe crossings for pedestrians near junctions and schools. • Fitzsimmons Nursery on the Portsmouth Road from The Mount is not very pleasant because the quickest walking route (down Mount Pleasant) has no pedestrian crossings on the way. • Route along the River Wey still not repaired. • Prioritisation of pedestrians/cyclist and making roads inconvenient for drivers • Walking route via Millmead Lock is not open • Walking along Bridge Street polluted and dangerous • Pedestrianisation of town
EV Charging and hubs	40	<ul style="list-style-type: none"> • Not enough charging points; lack of fast charging. • Electric vehicles too expensive for most people. • People who can't afford EV have no incentives; they are being penalised for not being able to afford a new expensive technology when there is not enough infrastructure. • Need to stop prioritising cars • From a vehicle design engineer. Battery electric vehicles, whilst providing zero emissions at the point of use, are very inefficient, costly and more environmentally damaging in the long term. Battery electric vehicles will be a part of the future but the pace of development in the motor industry of other low emission technologies, such as synthetic fuels and hydrogen, will mean that there will be other far more practical and appropriate low emission vehicles. • As such central and local government initiatives should not centre around providing a costly infrastructure for battery electric vehicles which ultimately will become redundant with the natural progress of better available technologies. • On street charging points leading to street clutter and unpleasant for walking and cycling

Subject	Approximate number of comments	Issues raised (selected extracts) Where applicable the same comment is in two or more categories
		<ul style="list-style-type: none"> Support for delivery hubs and Onslow P&R could be potential site.
Park and Ride facilities	35	<ul style="list-style-type: none"> Not a financially viable option for family; charged per passenger on the bus rather than for the vehicle Too far out Not suitable for large shopping trips Unreliable; long waiting times Closure of Spectrum P&R has impacted the users of Spectrum No P&R in North of Guilford
Cost and economic matters	40	<ul style="list-style-type: none"> Electric vehicles too expensive for most people. People who can't afford EV have no incentives; they are being penalised for not being able to afford a new expensive technology when there is not enough infrastructure
Re routing traffic and displacement	20	<ul style="list-style-type: none"> Walnut Tree Close one way system is causing more cars to go through the Woodbridge Road Restore Debenhams underpass. Guildford Bypass; alternative route to reach the Guildford station Residents along A3 bypass/Westborough/Dennis RA are worst affected; what actions for them Implement the Sustainable Transport Corridor Follow Freiburg example https://en.wikipedia.org/wiki/Freiburg_im_Breisgau#Transport
Clean Air Zone	20	<ul style="list-style-type: none"> CAZ could shift pollution to more unsuitable alternative routes in residential areas Follow Freiburg example https://en.wikipedia.org/wiki/Freiburg_im_Breisgau#Transport
Car parks	10	<ul style="list-style-type: none"> Discourage use of town centre car parks except for low emission vehicles Dedicated parking for private hire/delivery vehicles like just eat
Publicity and education	15	<ul style="list-style-type: none"> Would like to see initiatives near school, like Onslow Infant School which is near A3 Air quality level displays in town centre
Trees	10	<ul style="list-style-type: none"> More planting of trees Trees cut out pollution
Existing initiatives and current issues	40	<ul style="list-style-type: none"> Not well advertised No publicity Need to be on website and public pages Would like to see initiatives near school, like Onslow Infant School which is near A3 We live on Epsom Road near the junction with Boxgrove Road. Our address has worryingly high air pollution according to Imperial College data? Need to be checked

Appendix 4
Draft Air Quality Action Plan Results of Public Consultation Online Survey

Subject	Approximate number of comments	Issues raised (selected extracts) Where applicable the same comment is in two or more categories
Idling	10	<ul style="list-style-type: none"> • Engine idling near schools/stations; Guildford Park Road, The Chase/delivery vehicles idling • Prosecution on idling engine –already illegal
HGV emissions	10	<ul style="list-style-type: none"> • HGV ban quicker than CAZ • Lorry ban during the daytime will just mean night- time deliveries which will create night- time noise and pollution • HGV hubs – for north south routes, hubs need to be at each end of Guildford. • Restricting HGV in central area will cause them to bypass through unsuitable routes • Policing of bans • A business has responded that total ban on HGV will not be feasible for their business which delivers skips
Rail	10	<ul style="list-style-type: none"> • Rail stations at Park Barn & Merrow. • Introduce monorails
School traffic	15	<ul style="list-style-type: none"> • More school runs on buses • School buses • Operate school buses from P&R for all schools at a minimum cost • Zero Guildford are working with schools on sharing resources; worth checking on their projects
A3	5	<ul style="list-style-type: none"> • Onslow Infants A3 air quality • More pedestrian and cycle bridges over the A3
Smoke	5	<ul style="list-style-type: none"> • Control on bonfires/Wood burners • Enforce Smoke Control Areas
Particulates	5	<ul style="list-style-type: none"> • Tyres wear and tear • EV does not solve particulate matter issues from wear and tear
Car Clubs	3	<ul style="list-style-type: none"> • Expand the network and attach to all new developments
Modal shift	5	<ul style="list-style-type: none"> • Introduce monorails • River boat service • River Wey Taxi Shuttle
Schools in areas affected by air pollution	3	<ul style="list-style-type: none"> • Onslow Infants A3 • Sandfield • Fitzsimon Nursery • Zero Guildford are working with schools on sharing resources; worth checking on their projects
Planning applications and housing	10	<ul style="list-style-type: none"> • Comment on Guildford Cathedral development, No 165, mainly construction traffic, future gas boilers not considered in the AQ assessment; will lead to congestion on Ridgemont; Alresford Road during construction phase • Sustainable source of energy in new developments • Make developer CIL's go towards active travel infrastructure around their developments. Ensure new builds are working towards 15min city principles https://www.15minutecity.com/

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APPENDIX 5 SCC response to Guildford Borough Council –public consultation regarding the draft Air Quality Action for Guildford Town Centre Air Quality Management Area (July/August 2022)

Comment ref.	SCC Comment	GBC Comment reference to main report or AQAP
General comments given first, then listed by page number		
1	Travel planning at schools is not included, and whilst SCC has delivered a number of air quality programmes with districts and boroughs, these are intensive and take a lot of time. We would welcome GBC promoting Modeshift STARS and looking at encouraging more schools to have travel plans. We can clearly demonstrate reduction in vehicles and the shift to alternatives through this scheme.	Noted 01-09-2022 in 2.38 JC report
2	Cycling is mentioned to some degree but the only scheme mentioned is the Guildford to Godalming Greenway. This is a good scheme to implement, but there is still a considerable way to go to having a comprehensive cycle network across Guildford. Implementation of a high quality network at the same time as implementing measures to restrain traffic could yield significant benefits in the medium to long term.	Noted 26-08-2022 Measure no 30 Noted in 2.9 JC report
3	Whilst bus based park and ride is included, there is no mention of any other improvements to public transport.	Noted but no details provided 26-08-2022 Action 2.16 in JC report
4	In addition to the measures included / considered so far, to what degree have other traffic restraint measures been considered, for example: removal of parking in the town centre or increasing car parking charges for non-ULEZ compatible vehicles; closure/modal filtering on residential through routes to concentrate through traffic onto main roads; for example reducing capacity on main roads; a congestion charge; increasing residents' parking permit charges for non-ULEZ compatible vehicles. There may be quite a few potential measures that could have a significant benefit, that are not currently included – can they be reconsidered in light of the direction of the newly adopted LTP4?	Noted and requires more input from SCC as part of the Feasibility Study. Reference Measure 20CAZ.
5	There is no mention of doing more to deter car use in the town centre in the form of reducing car parking capacity, and increasing car parking charges. Park and Ride should be promoted as the alternative to taking private cars into the town centre, and reducing the amount of car parking and increasing the charges would help with this.	Noted as part of any potential CAZ feasibility studies. Note 2.17JC report

APPENDIX 5 SCC response to Guildford Borough Council –public consultation regarding the draft Air Quality Action for Guildford Town Centre Air Quality Management Area (July/August 2022)

Comment ref.	SCC Comment	GBC Comment reference to main report or AQAP
6	Surrey County Council should aspire for all town centres, busy shopping streets and minor roads in residential areas to have a 20 mph speed limit. Successfully restricting vehicles to 20 mph will also reduce emissions because it will reduce the emissions resulting from harder accelerating and braking between traffic queues, junctions and crossings. However we know that introducing 20 mph speed limits using signs alone will not be successful enough if the existing mean average speeds are much closer to 30 mph, in which case engineering changes (traffic calming or narrowing the road), will be necessary. Many of the roads in question are likely to have speeds 24 mph or below already (in which case a lower 20 mph limit would be viable without the need for additional measures). The first step would be to commission surveys to determine the existing speeds and which roads would require additional supporting measures or not.	Noted 24-08-2022 See action measure 4.
7	There could be greater emphasis on the potential for Local Traffic Neighbourhoods (creating using point closures) to deter car use. Evidence of such measures in Waltham Forest has shown that it has resulted in less traffic overall, even on boundary roads. In addition, there could be opportunities to introduce school streets (timed pedestrian zones) in the vicinity of schools that would deter car use for the school journey.	Noted 24-08-2022 Proposed as Measure 36.
8	An air quality programme for schools would require staff resources to develop the programme, recruit schools and to supervise the delivery. Such a programme would help in raising the importance and understanding of the issue of air quality. However, a more effective use of resources would be to encourage more schools to develop travel plans containing actions that the school will undertake to reduce car use for the school journey. These have been shown to encourage modal shift to more sustainable modes of transport which will reduce emissions near schools more effectively.	Noted 24-08-2022 Measures 7 and 8
	Comments by page number	

APPENDIX 5 SCC response to Guildford Borough Council –public consultation regarding the draft Air Quality Action for Guildford Town Centre Air Quality Management Area (July/August 2022)

Comment ref.	SCC Comment	GBC Comment reference to main report or AQAP
9	<p>Page 11 - It might be worth making reference to the county council’s Climate Change Strategy and Climate Change Delivery Plan in this section as they are both very relevant local policy documents that touch upon air quality.</p> <p>The strategy is available here: https://www.surreycc.gov.uk/community/climate-change/what-are-we-doing/climate-change-strategy</p> <p>The delivery plan is available here: https://www.surreycc.gov.uk/community/climate-change/what-are-we-doing/greener-futures-climate-change-delivery-plan-2021-to-2025</p>	Noted altered in 3.2.3 Draft AQAP 01-09-2022
10	Page 12 - The document refers to LTP3, rather than the newly adopted LTP4 document. The summary description should reflect the significant shift in focus to prioritising active and sustainable modes within decision making.	Noted altered in 3.2.5 Draft AQAP 24-08-2022
11	Page 23 - Reference is made to the EV pilot study being at construction stage. As of May this year, 19 chargepoints were fitted in Guildford as part of the on-street pilot. Jonathan James (SCC) may be able to provide the latest position.	Noted altered in 4.3 Draft AQAP 24-08-2022
12	Page 22-23 – the Guildford-Godalming Greenway would be a beneficial scheme and working in partnership with GBC/SCC is key to delivery. The route does not yet fully “exist” as there are unavoidable steps on the existing route, which mean the route is not fully accessible exist for people using wheelchairs as suggested.	Noted altered in 4.3 Draft AQAP 24-08-2022
13	Page 23 – the Walnut Tree Close experimental one-way scheme has been deployed.	Noted altered in 4.3 Draft AQAP 24-08-2022
14	Page 24 - Table 4.2 – Transport Planning & Infrastructure. The table cites a single scheme proposal (Guildford Godalming Greenway) and suggests it might not lead to much modal shift of commuter trips. However, many other schemes that will be included in our programme of walking/cycling improvements in the town would have the potential to contribute to a greater, more significant modal shift. Is there a way of reflecting this more holistically, perhaps by reducing focus on the GGG scheme only – for example, the Guildford to Burpham cycle scheme which is planned for later this year and should have the propensity to capture a significant number of utility trips.	Noted 01-09-2022

APPENDIX 5 SCC response to Guildford Borough Council –public consultation regarding the draft Air Quality Action for Guildford Town Centre Air Quality Management Area (July/August 2022)

Comment ref.	SCC Comment	GBC Comment reference to main report or AQAP
15	Page 24 – penultimate row of table – it is not true to suggest there is already a usable cycle route into Guildford from Godalming, as cyclists currently need to navigate carrying bikes up and down step or must choose to cycle along main roads.	Noted 01-09-2022 The usable question has been highlighted in 4.4 of the AQAP.
16	Page 25 – bus-based park and ride - arguably the site at the Spectrum is too close to the town centre to be fully effective in contributing to improved air quality in the town centre. To what degree has it been considered to introduce sites on more of the radial routes into the town centre – eg A320 (possibly at Slyfield?), A322 / A323 (vicinity of Rokers / Merrist Wood / Holly Lane / Fairlands), A3 / A3100 Burpham / Gosden Hill, A281 Shalford. High quality bus priority measures required to make these worthwhile.	Noted 01-09-2022 See 2.20 JC Report.
17	Page 25 – Measure 2 congestion on Strategic Road Network –SCC would welcome further consideration of improvements on and around the A3 to alleviate congestion and air quality issues.	Noted 01-09-2022 This needs to be referred to National Highways.
18	Page 25 – incident management –presumed little cost benefit here –if there is an incident on the A3, Guildford becomes gridlocked very quickly.	Noted 01-09-2022 This needs to be referred to National Highways.
19	Page 25-25 – 20mph zones – unless drivers obey a 20mph speed limit the impact of these schemes may be limited. However, low traffic neighbourhoods are included, which could have significant benefit in removing through journeys for motor vehicles, thus improving these areas for residents, pedestrians and cyclists.	Noted 01-09-2022 Both measures are included as 4 and 36 respectively. Low Traffic Neighbourhoods are however unlikely to improve the AQMA.
20	Page 26 – traffic control centre monitoring / real time traffic control (measure 5) – arguably, this should not be predicated on anything related to the A3 as suggested here. Real time traffic control could be beneficial with the A3 as it currently stands – but there would be a capital cost to establish (monitoring, system upgrades, information panels, etc) and a revenue cost to operate (maintenance of the equipment plus maintenance of the intelligence, plus potential cost of human operators if desired outcomes couldn't be achieved automatically).	Noted 01-09-2022 This needs to be referred to National Highways.
21	Page 26 – HGV ban (measure 6) – any possible HGV ban should be subject to appropriate testing, feasibility and benefits realised, and the consideration that it would be aimed at a minority contributor of pollutants, and may not therefore have a significant impact on its own. A number of issues should be considered including potential impact of any re-routing, and impacts on servicing local business.	Noted 01-09-2022 Will be subject to a feasibility study.

APPENDIX 5 SCC response to Guildford Borough Council –public consultation regarding the draft Air Quality Action for Guildford Town Centre Air Quality Management Area (July/August 2022)

Comment ref.	SCC Comment	GBC Comment reference to main report or AQAP
22	Page 26, Table 4.3 – Promotion of cycling travel route maps to public (Measure 9). SCC currently only provides an online map showing the location of cycle facilities in the county which doesn't offer the most user friendly or accessible service. We no longer publish paper maps. We're currently considering how we can best improve provision in this area. This should be considered a complementary measure to implementing a comprehensive network of cycle routes	Noted 01-09-2022 Set out as a complementary measure 9.
23	Page 26 – low pollution route maps for walking (measure 10) – a difficult measure to 'sell' versus a general tendency to prefer the most direct route.	Noted 01-09-2022 Set out as complementary measure 10
24	Page 27 – Potential CAZ / LEZ (measure 20) – difficult to target bus / HGV operators in isolation unless financial support provided to upgrade – there may be a risk that a competitive advantage is given to car drivers over buses, particularly in the context of LTP4. This should be considered carefully against other options such as an all-encompassing ULEZ as considered above.	Noted 01-09-2022 As set out in Measure 20
25	Page 28, Table 4.3 – Promoting Travel Choices (Measure 25). SCC plan to launch a media and information campaign in September 2022 to promote active travel over private car use for short journeys which will include the Guildford area.	Noted 01-09-2022 and put in JC report reference 2.78.
26	Page 38 Table B1 – to what degree can/should the AQAP include short, medium and long term interventions? Are there shorter term suggestions that would be beneficial to include in its assessment?	Noted 01-09-2022; the measures have been divided into Primary and complementary measures and will be further categorised as suggested
Notes re Surrey Transport Plan		

APPENDIX 5 SCC response to Guildford Borough Council –public consultation regarding the draft Air Quality Action for Guildford Town Centre Air Quality Management Area (July/August 2022)

Comment ref.	SCC Comment	GBC Comment reference to main report or AQAP
	<p>From the perspective of LTP4, please note the following, and see attached track changes for suggestions:</p> <p>Track changes noted try to cover anything that relates to or contravenes the policies within the LTP4. There were a few things that contradicted / did not align with the LTP4 that GBC had acknowledged were SCC’s responsibility and therefore wouldn’t be possible to implement. These are highlighted.</p> <p>A comment on a statement about the Guildford to Godalming Greenway is also included in addition to those given within this document above, and further reference added to the upcoming Local Cycling and Walking Implementation Plan (LCWIP) which should be included.</p>	<p>Altered 24-08-2022</p>

Consultation responses

1. Statutory consultees and elected authorities

Organisation	Response summarised	Comments
SCC- Highways	See Appendix 5	See Appendix 3B
SCC- Public Health	<ul style="list-style-type: none"> First paragraph - <i>Based on 2020 mid-year population estimates for the UK and Guildford, there is estimated to be the equivalent of 63-81 deaths in the borough.</i> I think it would be helpful to explain/reference where these figures have come from. I'm presuming you have taken the fraction of mortality attributable to particulate air pollution % for Guildford and used this % to calculate the number of deaths based on the total number for Guildford. This is fine, but some context would be helpful – i.e. to say how the figures were reached, and that they are an estimate of the number of deaths where air pollution is likely to be a contributing factor rather than a direct cause. I'm just looking for a bit of context so that the headlines don't become 63-81 people in Guildford have died as a direct result of air pollution. Second paragraph - <i>Air Pollution is a significant public health issue. In Guildford, the key pollutants are specifically nitrogen dioxide (NO₂) and fine particulates, these are principally from traffic emissions. Public Health England (now UK Health Security Agency) estimate that 5.7% of deaths in those over 25 years old are from long term exposure to anthropogenic particulate pollution.</i> Just suggest you include the highlighted wording above. 	<p>This comment has not been adequately referenced and has been deleted. 1/09/2022</p> <p>Noted and amended 1/09/22</p>
Woking Borough Council	Would like to be kept informed on any developments or proposals.	Noted 03/08/2022 To be briefed prior to JC Meeting on revisions.
National Highways	National Highways 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	Noted 01/09/2022 To be briefed prior to JC Meeting on revisions.

Organisation	Response summarised	Comments
	<p>(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.</p> <p>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 A3 and M25 Motorway.</p> <p>We have reviewed this consultation and note the aim of the draft Air Quality Action Plan is to help reduce air pollutants in Guildford and to improve air quality in the Guildford Town Centre Air Quality Management Area (AQMA) and actions that council will deliver between 2022 and 2027 to achieve this.</p> <p>Whilst the primary responsibility for addressing the Air Quality Management Areas (AQMA) rests with the relevant local planning authority (LPA) we are committed to work with the Council, noting that emissions arising from cars, Light Goods Vehicles (LGVs), Heavy Goods Vehicles (HGVs) and buses/coaches are identified as one of the main contributors to the air quality issues and our direct interest being the impact of the A3 on the air quality.</p> <p>The document sets Council's established relationship with the key transport infrastructure and service providers, which includes National Highways (nationally this is being done through established network of Air Quality points in our regional teams) in order to accelerate the development and delivery of appropriate improvements to meet the overall outcome, which is that there will be no requirement for Air Quality Management Areas in Guildford Borough.</p>	

Organisation	Response summarised	Comments
	<p>Our own Air Quality document may be of interest to you and can be accessed via the link below:</p> <p>https://nationalhighways.co.uk/our-work/environment/air-quality-and-noise/air-quality/#</p> <p>The Air Quality Action plan identifies number of actions developed by the Council to be considered under ten broad topics recommended by Defra, which echo those already included in our own strategy Air Quality Strategy (tackling vehicle emissions, the need for new technologies, innovative approaches etc.), which are either in monitoring, planning or operational management stages. In relation to the Guildford Area we are developing a Strategic Network Needs Assessment to consider options for reducing congestion on the A3 through Guildford and improving journey times. This assessment will also look at integrated transport, alternative modes (such as cycleway schemes funded through our designated funds) and active travel solutions as well as delivery of electric vehicles.</p> <p>Overall we are supportive of the draft Air Quality Action Plan and agree with the Council that large enough impact in a short timescale cannot be achieved in isolation and multiple measures will need to be implemented. We look forward to the continuous partnership with Guildford Borough Council to deliver these shared outcomes.</p> <p>Please continue to consult us as the Air Quality Action Plan develops.</p> <p>Regards</p>	

Organisation	Response summarised	Comments
	<p>Mrs Beata Ginn Assistant Spatial Planner (Area 3) National Highways Bridge House Walnut Tree Close Guildford GU1 4LZ Tel: +44 (0) 300 470 1118 Mobile: 0787 204 6392 Web: https://highwaysengland.co.uk/our-work/planning-and-the-strategic-road-network-in-england/</p>	
Waverley Borough Council	No formal response, but are part of the officer Steering Group.	24.08.2022 To be briefed prior to JC Meeting on revisions.
National Highways 1	<p>In responding to the consultation on Guildford Borough Council's (GBC) Air Quality Action Plan (AQAP) National Highways has set out their response mindful of the recently updated LAQM duties in the Environment Act 2021, Schedule 11, Paragraph 6 (see Annex A). The updated requirements in the Environment Act 2021 (<i>see sections 3 and 5 in Annex A</i>), required that for each measure they have a:</p> <ul style="list-style-type: none"> . Quantified level of change in annual mean NO₂ concentrations . Confirmed delivery timescales . Commitment to deliver each proposed measure with secured funding <p>National Highways comments on the draft AQAP and any potential impacts on the SRN are made against these three principals.</p> <p>Having reflected on the draft AQAP, we are unable to establish for any of the 29 proposed measures whether they would impact (either an improvement or worsening of annual mean NO₂ concentrations) on the SRN, namely the A3.</p> <p>As a general observation we note that none of the proposed measures meet with the legal duties specified in the Environment Act 2021 i.e. none of the measures have been quantified, there are no delivery timescales specified nor is there a commitment on a measure-by-measure basis to deliver any of the proposed measures.</p>	<p>01-09-2022 Noted and amended in JC report 5.11</p>

Organisation	Response summarised	Comments
	<p>To assist with the understanding of the work undertaken for the draft AQAP providing clarification for all the categories used to inform the options matrix would be greatly beneficial e.g. cost range 1 equates to >£5million and 5 up to £100k.</p> <p>National Highways is content for the ETCl to be included as a complementary measure in GBC's AQAP as the total number of vans travelling to and from the A3 to the city centre is unknown at this time, so cannot be quantified.</p> <p>National Highways continues to work with GBC to improve air quality along the A3 and support improvements in their AQMAs. However, we are unable to advise on whether any of the proposed measures would be effective in improving annual mean NO₂ concentrations as the draft AQAP as does not conform to the new reporting requirements for the purposes of LAQM.</p> <p>However, we remain committed to support GBC with the development of their AQAP and are happy to continue engaging with GBC over the coming months before the latest draft AQAP is issued in October this year.</p> <p>Annex A Extract from Environment Act 2021; Schedule 11 (https://www.legislation.gov.uk/ukpga/2021/30/schedule/11/enacted) The Environment Act 1995 is amended as follows. After section 83 insert— “83A Duties of English local authorities in relation to designated areas (1) This section applies in relation to a local authority in England. (2) A local authority must, for the purpose of securing that air quality standards and objectives are achieved in an air quality management area designated by that authority, prepare an action plan in relation to that area.</p>	

Organisation	Response summarised	Comments
	<p>(3)An action plan is a written plan that sets out how the local authority will exercise its functions in order to secure that air quality standards and objectives are achieved in the area to which the plan relates.</p> <p>(4)An action plan must also set out how the local authority will exercise its functions to secure that air quality standards and objectives are maintained after they have been achieved in the area to which the plan relates.</p> <p>(5)An action plan must set out particular measures the local authority will take to secure the achievement, and maintenance, of air quality standards and objectives in the area to which the plan relates, and must in relation to each measure specify a date by which it will be carried out.</p> <p>(6)A local authority may revise an action plan at any time, and must revise an action plan if it considers that there is a need for further or different measures to be taken to secure that air quality standards and objectives are achieved or maintained in the area to which the plan relates.</p> <p>(7)Subsections (8) to (10) apply where a district council in an area for which there is a county council is preparing an action plan, or a revision of an action plan.</p> <p>(8)Where the county council disagrees with the contents of the proposed plan, or the proposed revision of a plan, a referral of the matter may be made to the Secretary of State by—</p> <p>(a)the county council;</p> <p>(b)the district council preparing the plan or revision.</p> <p>(9)The Secretary of State may, on a reference made under subsection (8), confirm (with or without modifications) or reject the proposed action plan, or revision of an action plan.</p>	

Organisation	Response summarised	Comments
	<p>(10)Where a reference has been made under subsection (8), the district council may not finally determine the proposed action plan or revision of an action plan, except in accordance with the decision of the Secretary of State on the reference or in pursuance of a direction made by the Secretary of State under section 85.”</p> <p>[bold is National Highways emphasis]</p>	
National Highways 2	<p>I don't know if you are aware but the recent update to Env Act 2021, Schedule 11, changes the meaning of AQAPs and legal duties regarding of any and all measures agreed to an AQAP (https://nationalhighways.co.uk/our-work/environment/air-quality-and-noise/air-quality/air-quality-reports/). Para 83(A) provides more detail on the role of named measures in an AQAP.</p> <p>The main change brought about the new legislation, which came into force last November, is that any named measure in an AQAP must be delivered and achieve an improvement in air quality. This is a notable change from the previous requirements for AQAP which was more around listing possible measures, but there being no commitment (in law) to have deliver any named measures. I had a number of conversations with Government in the drafting of this element of the Bill given the possible ramifications of this change, hence my awareness of the change to this requirement.</p>	Noted and included in the JC report.
Shalford Community Council	<p>Would like to add the following comments for consideration to the AQMA consultation in addition to that covered in the consultation document. Firstly to reiterate we strongly agree with all the suggested actions but would like to add the following comments:</p> <p>1. we find it surprising that there is no link to the AQMA in Shalford as the boundary of each is so close and the issues of Shalford as a main feeder road to the gyratory system is within the Shalford AQMA</p>	<p>01-09-2022 Noted support for the measures and the direct relationship with the AQMA in The Street Shalford.</p> <p>Matters relating to the AQAP in Shalford and any approved</p>

Organisation	Response summarised	Comments
	<p>2. road users are the principal polluters and therefore the actual number of vehicles entering the town centre needs to be reduced dramatically</p> <p>3. this can only be achieved with a much greater increase in the use of public transport as well as facilities for cycling and walking into and around the town centre</p> <p>4. a clear air zone should be introduced at the earliest possible date with the addition of reduced speed limits to reduce pollution</p> <p>5. GBC should adopt the principal of 20mph zones within the town centre and across the borough to change the driving habits of residents and visitors across all areas. The 20's Plenty initiative is gaining support nationally and is an ideal way to reduce the spread of particulates This should include zones for different vehicle types. The appropriate one for Guildford town centre would be a Class 4 zone which covers buses, coaches, taxis, PHVs, HGVs, LGVs and cars</p> <p>6. School transport should be readdressed to reduce the number of vehicles on school runs, and a particular effort needs to be made to engage with private schools to encourage the offering of coach/mini bus transport rather than private car. the removal of the Pegasus bus scheme several years ago was a retrograde step for school transport.</p> <p>7. a reduction in public transport fares particularly for under 18's senior citizens and key workers could help shape change in people's behaviour</p> <p>8. a more joined up public transport system is needed where trains and buses link to make journeys quicker and easier and helping to encourage people out of their cars</p> <p>8. a greater commitment to spending on solving these problems is necessary. The experience of the Shalford AQMA has been that GBC has been reluctant to adopt any initiatives that involved any cost in contrast to many other cities who have committed to solving these problems.</p> <p>I hope you can take these comments into consideration although i know the consultation has now finished. As an immediate neighbour to the proposed area and having our own AQMA and recent discussions with you I am sure you will agree we are committed to making a success of any AQM initiatives within the borough</p>	<p>Guildford Town Centre AQAP are relevant</p>

Guildford Joint Committee



Forward Plan

Details of future meetings			
Dates for the Guildford Joint Committee (formal meetings): 26 th October 2022; later meetings tbc			
Topic	Purpose	Contact Officer	Proposed date
Decision Tracker	For information	Partnership Committee Officer	ALL
Forward Programme	Review the Forward Programme and consider further themes for Member briefings	Partnership Committee Officer	ALL
Guildford town centre final AQAP	Seeking approval of the final Air Quality Action Plan for Guildford town centre	Head of Environment and Reg'y Services, GBC	October 2022
Guildford Park & Ride	Review of the service and how it operates	SCC and GBC	Date tbc – informal meeting

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