

Surrey Air Alliance response to Clean Air Strategy- 14.08.18

Comments on Section 1 (Understanding the problem)

Q1: What do you think about the actions put forward in the understanding the problem chapter? Please provide evidence in support of your answer if possible.

[No response]

Q2: How can we improve the accessibility of evidence on air quality, so that it meets the wide-ranging needs of the public and other interested parties?

We welcome the desire to make monitoring data open and transparent. Through the partnership working of the Surrey Air Alliance, the constituent local authorities in Surrey (11 District and Boroughs and Surrey County Council) are looking at what can be done to make data more transparent and have improved our websites as a group in the last 12 months, something which we will continue to do to ensure residents had a good oversight and awareness of the data available in their area.

Comments on Section 2 (Health)

The strategy states that air quality is the largest environmental health risk in the UK; the Surrey Air Alliance recognises and supports this statement and believes working together at all levels is essential in addressing the issues.

We acknowledge and supports the section entitled ‘counting the costs of air pollution on health’ and note the potential health and social care costs of air pollution related diseases in England of £5.3 billion by 2035. It is noted that this cost does not take into account economic impacts due to lost productivity. The Annual Report of the Chief Medical Officer for 2017 entitled ‘health impacts of all pollution.’ recommended that Public Health England works to bring together all of the routinely produced data on the health impacts of pollution and the surveillance of pollution (including data held by local authorities, the Environment Agency and others), to ensure availability for the public, public sector and researchers.

Collectively we acknowledge that we must take action to reduce Particulate Matter and recognise that even small reductions can make a difference to health.

We support the thinking that “effective communication of health messages about air pollution can save lives and improve quality of life for many”. It is important that these messages are given as part of a wider education piece, and that both adults and children are communicated with. Increased use of nationally provided infographics that could be used in local campaigns would assist

The Surrey Air Alliance is working to improve the way in which our information is presented to the public online and is seeking to make messages consistent across the county. More guidance is needed to support giving “straightforward, practical information so that people can reduce their own emissions for the benefit of themselves and their neighbours”.

The Surrey Air Alliance supports the ambition to reduce PM_{2.5} levels in order to halve the number of people living in locations where concentrations of particulate matter are above 10 µg/m³ by 2025 and note the intention to set detailed interim objectives and report publicly on progress (p.26). Better traffic data and monitoring info will be important in this regard.

With the target to halve the number of people living where concentrations of PM_{2.5} > 10 µg/m³ by 2025 no base year has been set – will this be 2018? More monitoring will be required to define the current baseline and progress against the target. Currently there is no requirement on local authorities to monitor PM_{2.5}, and it is unclear if this will be changed as a result of the target - if so what support and additional resources could be provided to facilitate this? In Surrey, only one of the eleven districts and boroughs (Spelthorne) currently monitors PM_{2.5} within their area – none of these locations are on the AURN network and two of the three locations are privately funded.

The Surrey Air Alliance is currently developing a model for the county that will give a localised picture of PM in Surrey.

Q3: What do you think of the package of actions put forward in the health chapter? Please provide evidence in support of your answer if possible.

The Surrey Air Alliance supports the package of actions put forward in the health chapter.

Seven of the eleven Surrey districts and boroughs currently provide a personal air quality messaging system to inform the public about pollution episodes, via airAlert. This reaches approx. 900 vulnerable people across the County. The Surrey Air Alliance has been unable to extend this service to provide coverage to all Surrey residents as there is currently no suitable continuous monitoring in place in the south west of Surrey to facilitate local forecasting. SAA therefore welcomes the action to develop and deliver a personal air quality messaging system, but there is insufficient detail about the proposed scheme. For example:

- . Will Defra be installing more monitoring to ensure that the messaging service is based on local (and not regional) forecasting?
- . Will the service be provided free to recipients, as the current airAlert scheme is?
- . Will the service be open to all or restricted to certain types of vulnerable persons?
- . Who will administer and promote the scheme, and how will residents register? Will we be able to transfer over users of existing schemes?
- . The airAlert scheme provides messaging by text, email and voicemail (to landlines or mobiles). The demographics of users mean that voicemail and text notifications are the preferred means of communication. We would want any national scheme to be similarly inclusive.

Q4: How can we improve the way we communicate with the public about poor air quality and what people can do?

Suggestions to improve the way central government communicates with the public about poor air quality and what people can do, include:

- We support the Local Government Association's calls for 'a clear and comprehensive public health campaign at a national level, similar to those undertaken for smoking and obesity'. We agree with the association when they say that 'local measures will only be successful if they are well understood', and that 'only national government has the ability and resources to clearly communicate the nature of the problem with air pollution, the damage it can cause, the need for immediate action and what individuals can do to help'. (Local Government Association briefing: Debate on improving air quality, 28 June 2018).
- Ensure consistency, both in measures, and in the tools used to monitor air quality and take action – the differences between the national model and the local air quality management process are confusing and do not help us give out messages at a local level as to why action is needed in certain areas and not others.

- Greater use of advertising campaigns – a national campaign similar to the stop smoking campaign that raises awareness of idling, especially outside schools, awareness of the impacts of air quality on health especially from transport emissions. Campaigns with much stronger messages attributing poor health resulting from air pollutants to individual behaviour could be impactful and effective, similar to road safety campaigns.
- A national drive to encourage drivers to turn off their engines (to include explaining that they themselves are receptors whilst in their vehicles), or help people to find alternative routes to walk away from busy roads with the highest levels of pollution. Local schemes targeting anti-idling or encouraging ‘smart travel’ behaviours are impactful but not supported well enough with funding or resources to be widespread enough for the extent of the issue or understanding of individuals’ potential to improve the situation to be fully realised.
- Provide support for targeted campaigns within AQMAs to allow residents affected by these areas to understand air quality in their area, identifying and making clear the causes of poor air quality; where appropriate, provide support for working with residents or those who travel through these areas to help reduce the issue e.g. personalised travel planning to get people to walk and cycle more or (for example) encourage uptake of EVs. This requires funding and investment at a national level to allow action at a local level.
- Targeted campaigns with schools to educate teachers, parents and children on poor air quality and the causes for this – encourage schools to work with parents to reduce vehicular drop offs at the school gate and reduce engine idling. Educational piece around the damage caused by idling engines to raise awareness. Teacher travel-to-work patterns could be targeted more to reduce short distance car commutes to work – direct communication with schools is key so that issues and implications are more widely understood.
- Greater use of social media and focussing communication towards young people to ensure behaviours change early
- Engaging with vulnerable, or potentially vulnerable, people early on and keeping them up to date

The current AQ Grant funded schools AQ awareness project being delivered in the 2018/19 academic year by Surrey Air Alliance is looking to provide evaluation of its targeted media campaign as a case study in this area. Our work to date indicates that media campaigns do need to focus on busting the myth of less exposure in the cocoon of a private car than walking or cycling using the road or pavement. This is a barrier to encouraging greater active travel. If more parents were aware that being in a car is not protecting their children, this could greatly influence some peoples’ choice of mode.

Comments on Section 3 (Environment)

The Surrey Air Alliance supports the acknowledgement that “clean, green and healthy environments in urban and rural areas are an essential component of progress and are not a barrier to economic development” (p.28) and would support wider dissemination of this message to help gain public support for a wide range of sustainable transport measures, for example.

In addition to this, we would argue that clean, green and healthy environments can foster and create economic growth as clean air and promoting active travel etc. will reduce employee absenteeism, leading to healthier staff, healthier children will grow up to be active and aware of the issues meaning they will have less health issues later on in life, resulting in savings to the NHS.

Q5: What do you think of the package of actions put forward in the environment chapter? Please provide evidence in support of your answer in possible.

Potentially these actions seem too weak and need to be strengthened, both using the evidence already available, and through investing in additional evidence gathering and stronger leadership to deliver action. Suggestions for strengthening the package of actions could include:

- Communications to the public are again important to ensure people understand the actions taken. Promoting care for the environment and capitalising on recent public interest in protecting the environment (e.g. plastics, oceans) will be key in promoting behaviour change and delivering real action.
- Ensuring that the value of green infrastructure to air quality is fully recognised, both nationally and on a local level within planning and local authority processes. Promoting green infrastructure where applicable, and supporting research into these areas to ensure they can be utilised wherever practical, could be key to developing innovation in this area, and could help to bring a number of AQMAs for example, within compliance, and reduce the burden on public health.
- Bringing decisions around air quality and its impact on public health to the centre of planning processes, so that it is considered in a timely way and not as an afterthought once applications are approved.
- Ensuring that air quality is a key consideration in transport planning and funding decisions, so as to avoid generating or perpetuating air quality problems. The Local Sustainability Transport Fund had improvements in air quality as a secondary objective and the DfT's 'Impact of the Local Sustainability Transport Fund Summary Report' in 2017 refers to there being less direct effect of its impacts on air quality.

Page 32 states that 12% of the UK particulate matter comes from traffic. It does not define accurately the contribution of brake & tyre wear. Source apportionment modelling by Spelthorne Borough Council (in 2011, for 2011 and 2015) using the ADMS model put only 41% as exhaust emissions and 59% for brake and tyre wear. On this basis approximately 7% of total UK PM emissions comes from brake and tyre wear. There needs to be more actions and investment into what can be done to reduce these emissions especially given continued growth forecasts for the number of vehicles and car journeys going forward. This issue will not be fixed by electrification of the fleet.

Q6: What further action do you think should be taken to reduce the impact of air pollution on the natural environment? Where possible, please include evidence of the potential effectiveness of suggestions.

Invest in and support research into the benefits of 'green' infrastructure and other changes possible (for example widening pavements, moving carriageways), particularly in relation to areas close to main and trunk roads, where perhaps a straight reduction in traffic is unlikely as they are strategic routes, but well thought out mitigation is still required.

Promoting planting of trees and plants – green walls, green roofs, on roundabouts and alongside roads. Providing local authorities with a budget to do this and ongoing support to maintain this approach.

Providing community and school initiatives to get local involvement – work with organisations to implement schemes who have experience of this e.g. the Woodland Trust.

Putting more emphasis on planting and trees within new developments as part of the planning process – so that developers put more effort into providing vegetation which has the most carbon sinking properties along with air quality benefits and making planting more widespread.

The Strategy outlines that in 2022 new tougher emission standards will come into effect for all new domestic stoves. There is no evidence present about the expected lifetime of a domestic stove and as to how long it is anticipated for the majority of existing stoves to be replaced. Our perception would be that the Government should consider whether retrofitting grants are appropriate as per the original smoke control scheme under the Clean Air Act, especially where a stove is the only source of heating. In Surrey, monitoring of particulates gives evidence to indicate that domestic burning is more prevalent at evenings and weekends, coinciding with the lowest level of resourcing for local authority enforcement. What additional resources will be provided to local authorities to enable them to use planned additional powers.

No reference is made in the draft Strategy about air quality issues associated with domestic (or commercial) bonfires. These can cause annoyance, nuisance and respiratory issues for neighbouring residents, all the while contributing to local emissions. Current legislation under nuisance and dark smoke can be difficult to enforce for local authorities. Banning of bonfires (partially or on a voluntary basis) is an action coming into various local authority Air Quality Action Plans despite some public opposition. There is an opportunity within the overhaul of smoke control legislation to include powers for local authorities for more effective enforcement against domestic bonfires.

Comments on Section 4 (Clean growth and innovation)

The Surrey Air Alliance supports Surrey County Council's ambition to make the UK a world leader in goods and services focused on tackling air pollution. We are keen to work with suppliers and develop guidelines on what this will mean at county level for Surrey, and for Surrey to be a leading in this area.

Q7. What do you think of the package of actions put forward in the clean growth and innovation chapter? Please provide evidence in support of your answer if possible.

We are supportive of these suggestions. We would also support promoting measures to raise awareness of, and support, small scale household/ business renewable energy measures, alongside campaigns promoting the benefits to air quality.

More funding into innovations such as mobility as a service to move this forward.

There should be a short time period (say by 2025) the use of 'Red diesel' is banned in powering refrigeration units on delivery vehicles, especially with the introduction of liquid nitrogen as per the case study (page 38).

Q8. In what areas of the air quality industry is there potential for UK leadership?

[No response]

Q9. In your view, what are the barriers to the take-up of existing technologies which can help tackle air pollution? How can these barriers be overcome?

- Cost – the perception remains that the benefits are not outweighed by the cost of new technology
- Lack of promotion of alternative technologies e.g. EV cars still not being advertised and promoted very much (they are still seen as a niche product) while there remains so many adverts and marketing for combustion cars.

Government needs to work with industry to help change this – perhaps by providing incentives to reduce advertising of combustion cars and focus on alternative clean vehicle promotion.

- Lack of incentives/support for businesses to upgrade their fleets to EVs.
A lack of funding is a distinct barrier to local authorities upgrading their fleets when they could be seen as an example to local residents and businesses.
Work with local businesses to promote clean vehicles and car sharing.
Surrey County Council delivered a successful business engagement programme to work with businesses to help promote EVs, provide EV charge points at their workplace, and enable staff with EVs to have a parking space while providing no, or fewer, free parking spaces for combustion engines so staff have the incentive/confidence to make the switch. The Surrey Air Alliance is supportive of this approach and with Surrey County Council will continue to encourage businesses in this way, particularly those in proximity to current or planned sustainable transport schemes, or major schemes, but as this work is often seen as revenue funded workstream, there is limited funding to do this as much of the funding for these types of schemes is capital. This rigidity in the funding means less flexibility to support innovation and take up of new technologies.
- A lack of awareness of the benefits arising from new technologies, together with a lack of awareness of the health impacts of poor air quality – without education and awareness people may not consider using or choosing to invest in existing technologies such as EVs. Government should consider how it can deliver an extensive national campaign with strong messaging.
- Electric charging solutions – this needs to be thought out nationally like the Major Roads Network Consultation – this should not be passed to local authorities in its entirety who may not have the expertise or funding to be able to support developing a strategic plan of a comprehensive charging network that overcomes the barrier of range anxiety; previous bidding for this by SCC and the Surrey Air Alliance has been unsuccessful which has made producing such a strategic plan difficult; EV charging infrastructure is something we are regularly asked about by residents.

Q10. In your view, are the priorities identified for innovation funding the right ones?

[No specific response, see general comments above]

[Comments on Section 5 \(Transport\)](#)

Q11. What do you think of the package of actions put forward in the transport chapter? Please provide evidence in support of your answer if possible.

Road

It is noted that roadside emissions are largely covered by other documents (i.e. 2017 Clean Growth Strategy; 2017 Plan for tackling Roadside NO₂; and the recently published Road to Zero).

We can see that there is clear ambition for when petrol and diesel fuelled vehicles will no longer be produced, but when does the government intend for them to no longer be allowed on the roads?

Furthermore, and with regard to the impact of diesel vehicles – evidence suggests that diesel vehicles are the primary contributor to NO_x emissions. We believe that in order for significant change to occur to reduce emissions and have the best impact on public health, a national strategic approach to reducing diesel vehicles, sooner than 2040, is required and this should be led by central

government. This should include the consideration of banning diesels over a certain age; or a scrappage scheme incentive to encourage purchase of replacement low emissions vehicles at discounted rates.

Other incentives towards purchasing new (and second hand) low emission vehicles should be developed and or continued as well – through vehicle excise duty and purchase grants. Within the Road to Zero current grants are only guaranteed to October 2018, and it is very vague on the nature of a promise for continued incentives to 2020.

Maritime

In Surrey we have no coastal areas. However, there are numerous inland waterways and navigable rivers. Houseboats and leisure boats are a source of both domestic burning and combustion engine emissions which are not considered in the draft Strategy. Their smoke emissions can also be a local nuisance and annoyance to our residents. Current legislation on smoke control and emissions limits local authority enforcement abilities in this sector.

Rail

The Surrey Air Alliance will continue to support the electrification of the North Downs Line as a County Council rail priority that will reduce pollution and help remove diesel trains from the network (thereby supporting government's aim to remove diesel trains by 2040) together with energy efficiencies in the rail industry.

It is recognised that many journeys to rail stations are made by private car. There is a need for greater support to do more to promote multi-modal interchanges at stations, for example incorporating bus timetables with rail timetables so that bus and rail travel is more convenient and more attractive to help passengers shift to a rail/bus travel pattern rather than a rail/car travel pattern, helping to reduce single occupancy trips. Work with rail operators to encourage cycle/rail travel patterns should also be encouraged and supported.

There is a concern that as franchises change hands, the number of cycle parking spaces on trains is actually reduced, compromising passenger ability to travel by bike and train. Whilst it is recognised that there is a need for cycle storage at rail stations, there is also a need to encourage operators to provide space for bikes on board, this is perhaps counter to the 'incentive' provided for train operators who charge for vehicular parking spaces at station car parks, which helps them raise revenue, and consequently does not help them encourage more sustainable modes of travel to their stations.

Aviation

Harmful emissions from aircraft of ultrafine particulates at the very smallest scale ($PM_{0.1}$) should also be recognised as an area of growing concern, particularly downwind of airports. Research and evidence is currently evolving. Local authorities in Surrey are developing proposals to secure funding and expertise to begin monitoring $PM_{0.1}$ levels around airports.

Local authorities in Surrey are working with Heathrow and Gatwick to reduce/control emissions at these airports. We note the forthcoming Aviation Strategy due for publication later in 2018. We promote the need to include Southern Rail Access to Heathrow improvements and note that this is a Surrey County Council rail priority.

Modal shift

It is important to encourage more sustainable modes of transport such as cycling, walking and public transport, and shifting freight from road to rail. Relating to mobility as a service, the transport offer has to have an integrated approach having an appreciation of all people's needs.

We appreciate and share Surrey County Council's concerns that there are barriers to bidding for funding from a highway authority perspective for example the current benefits appraisal process required for schemes such as sustainable transport packages which makes securing funding difficult. The current appraisal process is geared towards evaluating more traditional road schemes and does not allow us to emphasise the benefits that can be unlocked from sustainable transport measures, including air quality and wider health benefits. Appraisal methods should appreciate that sustainable transport measures often need to tackle the 'too difficult' options which have previously been overlooked due to cost or other barriers but which are key in providing a full and safe continuous network.

There is a need for support with funding towards sustainable modes that are targeted in places where there are Air Quality Management Areas (AQMAs), to help local authorities in revoking these AQMAs.

We note the support for industry research into rail freight emissions in comparison to road emissions (p.48), we would also like to see support included for research into reducing emissions from 'last-mile' freight and household deliveries, and even research into reducing the number of same-day/next-day deliveries with a view to enabling a reduction in LGV trips which have been increasing in recent years.

In support of the view of Surrey County Council we would like to highlight some barriers to achieving a greater number of bus journeys made on electric / ultra-low emission buses: although operators are ready and willing to work in partnership with us buses typically have a 12-15 year lifespan, so fleet replacement needs to be planned. Moreover, the additional cost of purchasing a fully electric bus is around double that for a conventional diesel bus. In addition, the 'local grid' will almost certainly require capital improvements to facilitate the charging of electric buses, which is likely to require national consideration and investment.

We would also stress the importance of placing more emphasis on providing sustainable transport in new developments, particularly in larger sites, or more rural sites such as garden villages, specifically with the intention of helping to mitigate the impact of new developments on air quality.

More generally, there doesn't appear to be any acknowledgement here of the role both spatial planning and development planning can play in (a) shaping travel demand and (b) increasing the viability and attractiveness of non-motorised travel leading to modal shift.

Q12. Do you feel that the approaches proposed for reducing emissions from Non- Road Mobile Machinery are appropriate or not? Why?

We support the call for evidence on non-road mobile machinery (NRMM) usage. We would like to see Government taking forward a national scheme based on the current London Mayor's NRMM scheme for registration and emission standards. In Surrey (and other surrounding counties) we risk having higher emission plant pushed out of the Greater London area. We would though need support and additional resources/ skills to be able to take on an enforcement roll in NRMM inspections.

[Comments on Section 6 \(Emissions at home\)](#)

Ensuring that only the cleanest levels of stoves and fuels are available to the market are considered important, however this is exceedingly difficult to monitor and enforce as the document states. Whilst we welcome the aspiration for a nationwide approach we think that it will still be difficult to enforce, particularly if this responsibility remains with local authorities.

Q13. What do you think of the package of actions put forward to reduce the impact of domestic combustion? Please provide evidence in support of your answer if possible.

[No specific response, see general comments above]

Q14. Which of the following measures to provide information on a product's non-methane volatile organic compound content would you find most helpful for informing your choice of household and personal care products, and please would you briefly explain your answer? "A B C" label on product packaging (a categorised product rating for relevant domestic products, similar to other labels such as food traffic light labels) information on manufacturer website leaflet at the point of sale inclusion in advertising campaigns other option

[No specific response, see general comments above]

Q15. What further actions do you think can be taken to reduce human exposure from indoor air pollution?

National awareness campaigns on the issues with wood burning stoves with strong messaging to raise awareness of the impacts on health to help people make informed choices if they do not require a stove for heating/practical purposes. Options could include: requiring planning permission for all wood burning appliances so each one is assessed on an individual basis (taking into account the resources that would be required for this); requiring people to register wood burning appliances to help local authorities with enforcing smoke free zones and monitor the level of use.

[Comments on Section 7 \(Farming\)](#)

Q16. What do you think of the package of actions put forward in the farming chapter? Please provide evidence in support of your answer if possible.

[No response]

Q17. What are your preferences in relation to the 3 regulatory approaches outlined and the timeframe for their implementation: (1) introduction of nitrogen (or fertiliser) limits; (2) extension of permitting to large dairy farms; (3) rules on specific emissions-reducing practices? Please provide evidence in support of your views if possible.

[No response]

Q18. Should future anaerobic digestion (AD) supported by government schemes be required to use best practice low emissions spreading techniques through certification? If not, what other short-term strategies to reduce ammonia emissions from AD should be implemented? Please provide any evidence you have to support your suggestions

[No response]

[Comments on Section 8 \(Action to reduce emissions from industry\)](#)

Q19. What do you think of the package of actions put forward in the industry chapter? Please provide evidence in support of your answer if possible.

[No response]

Q20. We have committed to applying Best Available Techniques to drive continuous improvement in reducing emissions from industrial sites. What other actions would be effective in promoting industrial emission reductions?

[No response]

Q21. Is there scope to strengthen the current regulatory framework in a proportionate manner for smaller industrial sites to further reduce emissions? If so, how?

[No response]

Q22. What further action, if any, should Government take to tackle emissions from medium combustion plants and generators? Please provide evidence in support of your suggestions where possible.

[No response]

Q23. How should we tackle emissions from combustion plants in the 500kW-1MW thermal input range? Please provide evidence you might have to support your proposals if possible.

[No response]

Q24. Do you agree or disagree with the proposal to exempt generators used for research and development from emission controls? Please provide evidence where possible.

[No response]

Comments on Section 9 (Leadership at all levels)

We agree with the Local Government Association's assessment that the Government's air quality plans will rely on clear leadership, sufficient funding and proactive action, and will need to be accompanied by robust, national action and an updated legislative framework in order to be successful.

It's not clear what is meant by "replace the existing patchwork with single coherent legislative framework for local authorities to tackle air quality and bring the law up to date with the evolution of structures at sub-national level so that accountability for air quality sits in the place". However, we would welcome a clearer approach to simplify existing legislative frameworks i.e. local air quality management and clean air zones and smoke control areas, however this will need careful consideration to ensure that the process is as transparent as possible and is no more onerous on local authorities.

With regards to section 9.4 'local action on clean air', what consideration has there been for if there are no CAZs declared in an area i.e. Surrey? It seems that if there are no CAZs declared in Surrey – presumably there will be no new powers to prevent areas from becoming a problem, the strategy doesn't seem to allow for prevention of problems, but this section is perhaps unclear.

The District and Borough Councils through their Surrey Environmental Health Managers Group are working with Surrey County Council through the Surrey Air Alliance to deliver programmes of work to raise awareness and education around air quality as well as deliver schemes to improve air quality.

A number of examples provided in the draft strategy are all very well but are isolated examples. We understand that the Local Authorities involved had to go through a rigorous process to obtain these powers, for example workplace charging. We consider that such powers should be universally available as part of a readily adopted toolkit for local authorities to utilise as required.

We are concerned about the process of CAZ and if not applicable this may well led to restricted access to funding. We are also concerned that there may be a two-tier approach developing to DEFRA funding based on the different approach to EU Directive and LAQM.

Q25. What do you think of the package of actions put forward in the leadership chapter? Please provide evidence in support of your answer if possible

[No specific response, see general comments above]

Q26. What are your views on the England-wide legislative package set out in section 9.2.2? Please explain, with evidence where possible

[No specific response, see general comments above]

Q27. Are there gaps in the powers available to local government for tackling local air problems? If so, what are they?

[No specific response, see general comments above]

Q28. What are the benefits of making changes to the balance of responsibility for clean local air between lower and upper tier authorities? What are the risks?

[No specific response, see general comments above]

Q29. What improvements should be made to the Local Air Quality Management (LAQM) system? How can we minimise the bureaucracy and reporting burdens associated with LAQM?

[No specific response, see general comments above]

[Comments on Section 10 \(Progress against targets\)](#)

Q30. What do you think of the package of actions in this strategy as a whole?

[No response]

Q31. Do you have any specific suggestions for additional or alternative actions that you think should be considered to achieve our objectives? Please outline briefly, providing evidence of potential effectiveness where possible.

Generally, it is felt that the strategy could emphasise further the importance of education in addressing air quality. The Surrey Air Alliance is currently developing an engagement campaign specifically with schools, to raise awareness amongst young people of the significance of air quality and the actions they can take to help improve it. The Surrey Air Alliance believes that education is central to improving air quality, however support for schemes like this is needed to be able to roll them out further and reach a wider audience.

Q32. If you have any further comments not covered elsewhere, please provide them here.

We would like to reinforce the importance of engagement work to encourage behaviour change in relation to improving air quality and, specifically, the need for funding and budgets to support this.

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