

GUILDFORD BOROUGH COUNCIL AND  
SURREY COUNTY COUNCIL



GUILDFORD  
BOROUGH

GUILDFORD JOINT COMMITTEE

**DATE:** 3 July 2019

**LEAD OFFICER:** JUSTINE FULLER, REGULATORY SERVICES MANAGER,  
GUILDFORD BOROUGH COUNCIL

**SUBJECT:** COMPTON AIR QUALITY MANAGEMENT AREA –  
ACTION PLAN

**AREA AFFECTED:** COMPTON

**SUMMARY OF ISSUE:**

The report seeks approval of the Air Quality Action Plan for Compton, which proposes introducing a ban on turning right into Down Lane. Modelling indicates that nitrogen dioxide concentrations will reduce, making the area compliant with the air quality standard. This will be kept under review, and if concentrations are not reducing other measures will be taken.

The Air Quality Action Plan which is required to address the levels of nitrogen dioxide has support of the Highways Authority, Surrey County Council. A detailed response has been provided to the consultees who have raised concerns about the likelihood of success of the Air Quality Action Plan and provided reassurance that the impact of the measure will be evaluated and evidence provided before the AQMA can be revoked.

**RECOMMENDATIONS:**

**The Guildford Joint Committee is asked to agree that:**

- (i) The Committee adopts the Air Quality Action Plan for Compton in Appendix 1 which is to ban the right turn into Down Lane, Compton.
- (ii) The Committee support the advertising of the order to effect the traffic regulation order to introduce a right turn ban from The Street, Compton into Down Lane.

**REASONS FOR RECOMMENDATIONS:**

To ensure the Council meets its statutory duties to adopt an air quality management area action plan and to improve air quality in The Street, Compton.

**1. INTRODUCTION AND BACKGROUND:**

- 1.1 A detailed assessment of air quality in Compton during 2017 found a small number of residential properties at which levels of nitrogen dioxide exceed the air quality standard. The Borough Council has a statutory duty, under Section [www.surreycc.gov.uk/guildford](http://www.surreycc.gov.uk/guildford)

83 of the Environment Act 1995, to declare an 'air quality management area' (AQMA) where a breach of the air quality standard has occurred.

- 1.2 On the 28 November 2017, Guildford Borough Council designated an Air Quality Management Area (AQMA) in an area of Compton due to a breach of the national annual mean level of nitrogen dioxide air quality standard (National Air Quality Objectives and European Directive limit and target value for the protection of Human Health). The AQMA Order can be seen in Appendix 2.
- 1.3 The Executive also approved a 4 week consultation on a draft air quality action plan (AQAP) for the area which can be seen in Appendix 3.

## **2. ANALYSIS:**

### Consultation on draft AQAP 2018

- 2.1 Consultation on a draft AQAP was conducted between 22 February and 13 April 2018. During this time we consulted directly with both statutory and non-statutory consultees, shown in Table 2 Appendix 1 and published details of the consultation on our website.
- 2.2 Consultee's views on five different options for improving air quality were sought along with any further measures or comments. The five options were:
  - Option 1: Banning HGVs from travelling through the declared AQMA
  - Option 2: Introduction of a 20mph zone along The Street, Compton
  - Option 3: Introduction of traffic signals along The Street in order to relieve congestion in the AQMA area
  - Option 4: Combined; Options 1 (Banning HGVs travelling through the declared AQMA) and 2 (Introduction of a 20mph zone along The Street, Compton)
  - Option 5: Combined; Options 1(Banning HGVs travelling through the declared AQMA) and 3 (Introduction of traffic signals along The Street in order to relieve congestion in the AQMA)
- 2.3 The 5 options were modelled and this indicated that Options 1 and 2 combined are likely to deliver the largest reduction in the nitrogen dioxide emission in the AQMA.

### 2018 Consultation results

- 2.4 9 consultation responses were received which is a response rate of 24%. Responses from residents and the Parish Council showed support for Option 4 which is a combination of banning HGVs travelling through the AQMA (Option 1) and reducing the speed limit to 20mph in The Street, Compton (Option 2).
- 2.5 Surrey County Council Highways Authority were not supportive of banning HGVs (Option 1) for the following reasons:

B3000 is most suited route between A31/A3 for HGVs and for businesses located on/off B3100; D96 Priorsfield Road/Hurtmore Road is unsuitable for HGVs; Alternative route via Guildford will be temporary diversion route during the Network Rail Bridge replacement work, however, in long run will shift the problem elsewhere as well as increase in overall emission level.

- 2.6 Reducing the speed limit to 20 mph (Option 2) was also not considered to be a viable option by Surrey County Council Highways Authority as there were concerns about the success in improving air quality and the deliverability of the speed reduction. The Highways Authority are a key partner in delivering the action plan measures and as they are unable to support Options 1 and 2 both these measures were excluded.
- 2.7 Option 3 of introducing traffic lights was excluded as a possible measure as it was not endorsed by any of the consultees. A summary of the consultation responses can be seen in Table A.1 in Appendix 1.
- 2.8 After fully evaluating the consultation responses it was determined that all the options and combination of options were not viable and further options that would deliver the necessary air quality improvements needed to be explored.

#### 2019 AQAP

- 2.9 To help generate new options for the Compton AQAP, the Council conducted further investigations about the traffic travelling through the AQMA. A 24 hour Automatic Number Plate Recognition (ANPR) survey along with a queuing study provided data to help identify a measure or combination of measures that could reduce the nitrogen dioxide levels below the national annual mean. The queuing survey was commissioned as initial consultation responses from residents suggested banning the right turn into Down Lane would reduce queuing and in turn emissions.
- 2.10 Discussions with Surrey County Council identified no alternative feasible measures to reduce the number of diesel vehicles, which account for the majority of the NOX emissions within the AQMA, so were not considered any further.
- 2.11 Further modelling of nitrogen dioxide concentrations, including the effect of banning the right hand turn into Down Lane was conducted incorporating the ANPR and queuing study results. Appendix E of the Air Quality Action Plan for Compton, attached in Appendix 1 provide comprehensive details on the scenarios modelled.
- 2.12 The results of the modelling show that nitrogen dioxide concentrations fall below the objective level at all locations in 2018 apart from Little Cottage where concentrations do not fall below the objective level until 2022.
- 2.13 The closure of the right hand turn into Down Lane is anticipated to alleviate the peak hour queues that form north bound reducing the nitrogen dioxide concentrations at Little Cottage to make the area compliant with nitrogen dioxide limits by 2021. The revised action plan can be seen in Appendix 1.

### 2019 consultation results

- 2.14 The seven consultation responses received between 3 and 24 May 2019 offered mixed views on the revised draft AQAP with some respondents raising concerns about the potential effectiveness of the measure.
- 2.15 Resident 1 and a Shalford Ward Councillor do not believe the measure will be effective and want other measures to be implemented in addition to banning the right hand turn into Down Lane. The Councillor concerns about signage diverting HGVs will be followed up separately with Surrey County Council who need to consider the impact on the wider road network.
- 2.16 A comprehensive joint response was submitted by Compton Parish Council's Traffic Committee and the owners of the three properties within the AQMA, who do not support the analysis in the AQAP that concludes banning the right hand turn will bring the air quality achievements required. All consultation comments have been reviewed and a response providing further information and justification provided.
- 2.17 Two responses (Majors Teams, Guildford Borough Council and Highways England) provided no comments for consideration. Waverley Borough Council did not object but requested that any potential measures consider the impact on the AQMA in Godalming. Surrey Public Health sought clarification on a couple of matters including cycling infrastructure.
- 2.18 The full consultation responses and detailed comments are shown in Appendix 4.
- 2.19 After evaluation of all the consultation responses, the proposed measure has not been changed. The concerns of respondents are acknowledged and if the predicted air quality improvements are not achieved should the AQAP be adopted then further action will be taken.
- 2.20 The results of air quality monitoring in Compton and any proposal to revoke the AQMA will be communicated with consultees.

### **3. OPTIONS:**

- 3.1 As Guildford Borough Council are under a statutory duty to adopt an Air Quality Action Plan for the AQMA in Compton, doing nothing is not an option.
- 3.2 There are 2 options available after considering the information in this report:
1. Approve the Air Quality Action Plan for Compton in Appendix 1.
  2. Adopt a modified version of the Air Quality Action Plan for Compton in Appendix 1.
- 3.3 Officers recommend Option 1, as the evidence suggests that these measures, if implemented, will reduce nitrogen dioxide levels so there is no longer an exceedance of the air quality standard for nitrogen dioxide. If nitrogen dioxide levels are reduced to the levels predicted then the AQMA could be revoked.

#### **4. CONSULTATIONS:**

- 4.1 Consultation has taken place with senior officers and Lead Members for Air Quality at both Guildford Borough Council and Surrey County Council. All support the option of banning the right hand turn into Down Lane, subject to keeping this under review. We have also briefed the County member and Cabinet Member for Highways, Councillor Matt Furniss.
- 4.2 Surrey County Council Officers raised the potential issue for increased conflict at the roundabout junction. This is due to the change in driving patterns with more vehicles completing a u-turn to access Down Lane and vehicles pulling off the A3 having to slow or stop. The slightly increased risk to road safety can be mitigated by improved signage.
- 4.3 Consultation has been carried out with Surrey Police and they support the proposal.

#### Legal Implications

- 4.4 The provisions of Part IV of the Environment Act 1995 (the Act) establish a national framework for air quality management, which requires all local authorities in England, Scotland and Wales to conduct local air quality reviews.
- 4.5 Section 82(1) of the Act requires these reviews to include an assessment of the current air quality in the area and the predicted air quality in future years. Should the reviews indicate that the objectives prescribed in the UK Air Quality Strategy (DEFRA 2007) and the Air Quality (England) Regulations 2000 as amended will not be met, the local authority is required under Section 83(1) of the Act to designate an Air Quality Management Area (AQMA).
- 4.6 The Council has a statutory duty, under Section 83 of the Environment Act 1995, to declare an 'air quality management area' (AQMA) where a breach of the air quality standard has occurred.
- 4.7 The Council must produce and consult on an action plan, which details the proposed actions to ensure that air quality in the area improves. Guidance issued by Defra state that the Council should aim to produce the action plan within 12 months of declaring the AQMA.

#### **5. FINANCIAL IMPLICATIONS:**

- 5.1 Guildford Borough Council will meet the £5,000 cost of implementing the ban on right hand turn from an existing budget for air quality. Staff costs will be met within existing resources.

#### **6. WIDER IMPLICATIONS:**

- 6.1 The potential implications of the proposed action have been considered in relation to the following Council priorities and policies.

<b>Area assessed:</b>	<b>Direct Implications:</b>
Crime and Disorder	No significant implications
Equality and Diversity	No significant implications
Localism (including community involvement and impact)	No significant implications
Sustainability (including Climate Change and Carbon Emissions)	Significant implications
Corporate Parenting/Looked After Children	No significant implications
Safeguarding responsibilities for vulnerable children and adults	No significant implications
Public Health	Significant implications
Human Resource/Training and Development	No significant implications

## 6.2 Sustainability implications

There will be a small reduction in carbon emissions as a result of implementing the action plan.

## 6.3 Public Health implications

The implementation of the proposed action plan will have a positive impact on the health of those within the AQMA.

## **7. CONCLUSION AND RECOMMENDATIONS:**

- 7.1 Following the designation of an AQMA in The Street, Compton, initial consultation on a draft action plan resulted in further investigations and a revised action plan with alternative measures to improve air quality to meet the air quality objectives in the area.
- 7.2 The second consultation proposed banning the right hand turn into Down Lane which not all consultees fully support as they want additional measures to be implemented. A full response was provided to all the consultees which aims provide reassurance that the AQAP will be reviewed if the measure identified is not successful.
- 7.3 Officers recommend Option 1, as the evidence suggests that the measure of prohibiting the right hand turn into Down Lane, if implemented, will reduce nitrogen dioxide levels so there is no longer an exceedance of the air quality standard for nitrogen dioxide. If nitrogen dioxide levels are reduced to the levels predicted then the AQMA could be revoked.

## **8. WHAT HAPPENS NEXT:**

- 8.1 If the action plan is adopted, officers from Guildford Borough Council and Surrey County Council will implement the measure of banning the right turn into Down Lane.
- 8.2 The impact of the measure in reducing nitrogen dioxide levels will be monitored throughout the year by the diffusion tube data followed by a formal review in 2021 to determine if the AQMA can be revoked.

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8.3 After the annual review has been conducted, an update report will be presented to Joint Committee.

**Contact Officer:**

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**Consulted:**

The following teams and person have been consulted on the report:

Surrey County Council: William Bryans, Transport Studies

Guildford Borough Council: Director of Community Services, Corporate Management Team, legal, finance, communications and human resources

**Annexes:**

- Appendix 1 – Compton Air Quality Management Area action plan April 2019- AECOM
- Appendix 2 – Air Quality Management Area Order for The Street, Compton
- Appendix 3 – Draft Air Quality Action Plan 2017– AMEC Foster Wheeler
- Appendix 4 – Consultation responses and comments to draft AQAP May 2019

**Background papers:**

- Executive, Guildford Borough Council, 28 November 2017  
<http://www2.guildford.gov.uk/councilmeetings/ieListDocuments.aspx?CId=132&MI d=608&Ver=4>
  - Local Air Quality Management, Policy Guidance (PG16), Defra, April 2016  
<https://laqm.defra.gov.uk/documents/LAQM-PG16-April-16-v1.pdf>
  - Local Air Quality Management, Technical Guidance (TG16), Defra, April 2016  
<https://laqm.defra.gov.uk/technical-guidance/>
  - Air Quality (England) Regulations 2000  
<http://www.legislation.gov.uk/uksi/2000/928/contents/made>
  - The Environment Act 1995 <https://www.legislation.gov.uk/ukpga/1995/25/contents>
  - The Air Quality (England) (Amendment) Regulations 2002  
<http://www.legislation.gov.uk/uksi/2002/3043/contents/made>
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