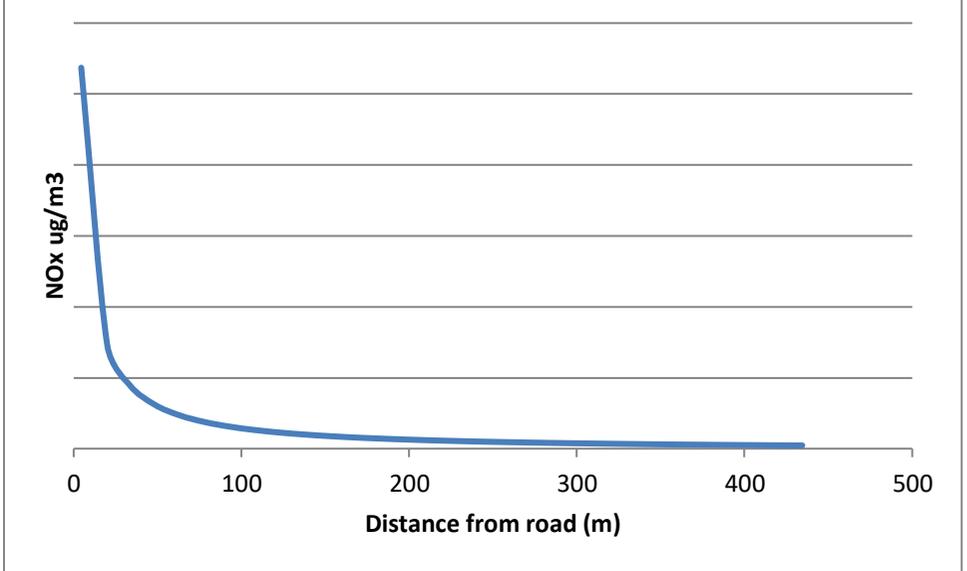


Consultation responses to the second draft Air Quality Action Plan, Compton Air Quality Management Area - 3 May 2019 to 24 May 2019

Consultee	Response
Compton Parish Council Comment	
1. This response has been prepared jointly by Compton Parish Council’s Traffic Committee and by the owners of the three properties which are within the Air Quality Management Area (AQMA).	N/A
2. We are of the opinion that the analysis in GBC’s Action Plan (AQAP) does not support the conclusion that banning right hand turns into Down Lane will bring the necessary improvements in air quality. We are very disappointed that the <u>only</u> recommendation is the “no right turn” into Down Lane which we proposed in our response to the original consultation in 2018 as an additional measure which could make a small difference. On its own, we do not see this measure making a sufficient difference to reduce the pollution below the targeted level as we explain in this response.	N/A
3. The town centre transport scheme for Guildford is referenced, but is there any evidence that this will positively impact Compton? Is it not possible that pushing traffic out of the town centre, might in fact increase traffic in the outlying villages such as Compton? Better public transport is mentioned as a key component of GBC’s report and transport scheme, but this is unlikely to affect Compton which has just one bus service which needs subsidising.	These comments are referring to the Council’s general commitment to improving air quality across the Borough. There is no suggestion that they will directly benefit Compton. It is unlikely that such schemes would increase traffic through Compton.
4. <u>Pollution in the AQMA</u>	
4.1 How pollution levels respond to a reduction in vehicle numbers is highly relevant to the consideration of how to improve air quality. As the data show, readings during the 3 months the bridge was closed (late April to late July 2018) showed that May and June were above the 2017 levels and it was only July which showed a reduction below 40ug. As the volume of traffic dropped substantially during the closure period and there were virtually no lorries at all, we wonder whether GBC is totally convinced that the pollution in the AQMA does come from traffic passing through Compton and not to some extent from another source such as being blown by the wind from the nearby A3.	<p>The bridge was closed from 22May 2019 to 14 July 2019. Monthly averages from diffusion tubes are not reliable, and should not be used for analysis. Only the annual mean concentrations should be used.</p> <p>There are no traffic counts from the period that the bridge was closed, so no comparison with concentrations and traffic flow during this period is possible.</p> <p>The A3 is 300m from the AQMA. Dispersion of NOx from road sources drops exponentially from the kerbside, and is approximately at background concentration before 200m from the source. Therefore the location is too far from the A3 to be significantly affected by emissions from this source. The graph below shows the exponential drop-off in concentrations from the road source. Values of NOx concentration have been removed as this is not a specific curve relating to this location.</p>

Consultee	Response
	 <p>The graph shows a blue line representing NOx concentration in $\mu\text{g}/\text{m}^3$ on the y-axis against Distance from road in meters (m) on the x-axis. The x-axis ranges from 0 to 500 with major ticks every 100 units. The y-axis has five horizontal grid lines. The curve starts at a high value at 0m, drops very steeply between 0 and 50m, and then continues to decrease more gradually, reaching a low, stable concentration by approximately 100m, which it maintains up to 500m.</p>
<p>4.2 Some of the alleged general improvement in air quality seen during the whole of 2018 may be due to the bridge closure causing reduced traffic for several months of the year. The fact this is not even mentioned in the report is worrying. For example, there is no mention whether there have been adjustments to the 2018 figures to take account of this. We would have expected to see the pollution levels for 2018 split into different periods. It is therefore not clear if there is really a general gradual reduction over time as claimed in the last paragraph of page 5. This is highly relevant to the assumption towards the end of the report that levels will improve gradually even if no action is taken.</p>	<p>The NO_2 concentrations at Little Cottage and Moors Cottage actually increased slightly between 2017 and 2018. However, 2017 concentrations appear to have been lower than would be expected, and the general trend has been a reduction in concentration (from $67 \mu\text{g}/\text{m}^3$ in 2014 to $46 \mu\text{g}/\text{m}^3$ in 2018).</p> <p>The Objective is an Annual Mean concentration. Therefore it would not be correct to split the data into different periods within the year.</p> <p>The assumption about levels improving if no action is taken is not based on the current monitoring data, which cannot predict the future. The statement has been made based on the model results from the future year scenarios. These are based on DEFRA predictions about improvements to the traffic fleet as old cars come to the end of their lives and new cars enter the fleet. The future emissions used are worse than the default DEFRA emissions for each year, as the fleet has been tailored to that measured in Compton, which is older than the national fleet.</p>
<p>4.3 The decline in NO_2 (page 5) is undoubtedly down to a slight drop in general traffic volume over the last 3 years, particularly going northbound. This is supported by Compton's VAS results but the reasons for this are unknown and could be due to the number of factors, including incidents, road works, bridge maintenance issues, leading to traffic taking diversions or alternative routes). However, the correlation between reduction in volume and reduction in NO_2 as a solution has not been explored.</p>	<p>Past declines in traffic volumes are not relevant to this study. Traffic volumes have not been adjusted in the future scenarios, and remain at the current levels. Therefore the current trend of reducing volumes has not been continued – again contributing to a conservative assessment of when concentration levels will drop below $40 \mu\text{g}/\text{m}^3$.</p>
<p>4.4 We have to question, therefore, whether the data has been analysed properly in light of the absence of any reference to the bridge closure and also failure to consider how the pollution levels responded to this, including considering whether the data suggest other possible contributory causes.</p>	<p>N/A</p>

Consultee	Response
5. <u>Data on which modelling is based</u>	
5.1 The ANPR study was carried out on the 2nd working day after the bridge reopened and on a date which was in the school holidays. It cannot therefore be relied on as definitively being representative of the traffic levels and mix through Compton, as many drivers had changed their habits and HGV drivers had been diverted, such that it is likely to have taken a week or two for normal levels and mix of traffic to re-establish itself.	The ANPR study was carried out on Tuesday 17th July 2018. The Surrey school holidays did not start until the 23 rd July 2018. Whilst it is acknowledged that there are Private schools in the area that may have been on holiday when the survey was undertaken, the most local private schools would not use The Street as a route, or are weekly boarding.
5.2 We also note that the ANPR data (shown in Figure C.3 at page 21) shows no southbound traffic at all after 7.30pm (in contrast to continued traffic going northbound). This cannot be right and indicates either a fault in the monitoring equipment or some other event which means that the reliability of the data has to be questioned.	As stated in the text describing Figure C.3, the figure is based only on those vehicles for which the number plate was recorded. This is a 5 th of the total vehicles, and therefore the total numbers shown in this figure are only a 5 th of the total flow. There were vehicles registered after 7:30pm.
5.3 These question marks over the ANPR data throw doubt on all the other analysis and forward-modelling in the report. We would recommend that a second ANPR study be undertaken on a weekday during term time.	The ANPR was done on a weekday during (state school) term time.
5.4 We also query the marked reduction in NO2 levels in 2017 shown by the monitoring equipment (summarised in Table 1 on page 6). Higher levels, more akin to those measured during 2016, reappear in 2018. Why would the mean levels at Little Cottage decline from 50 parts in 2016 to 40 parts in 2017 and rise again to 46 in 2018? This requires investigation as to whether there has been any change in the sampling process and whether the figures can be relied upon.	There has been no change in the diffusion tubes used by Guildford Borough Council. There are many reasons for potential reductions in measured concentration, for example differences in meteorological conditions and ozone concentrations year-on-year. Trends should be considered over longer periods of time due to this.
5.5 It is striking that nowhere in the AQAP is the bridge closure specifically referred to - it is only mentioned once in the context of the report's summary of the comments received last year from Compton Parish Council. This is a striking omission and must throw into doubt the reliability of the entire report.	The bridge closure does not directly impact any of the work undertaken in this assessment.
6. <u>Accuracy of model</u> Further concerns arise regarding the accuracy of the model (which may be due, in whole or part, to the concerns regarding the underlying data covered in 5 above). It is clear from the explanation on pages 27 and 28 that when the model was first used to try to replicate the actual results for all monitoring sites, the correct results were not achieved for all locations and a decision was made therefore to apply a "conservative" multiplication factor based on the C4 receptor alone. However, this inability to replicate the results across all locations suggests that there could be an error in the approach (which may be due to the flawed data) and therefore the forward modelling may also be unreliable in ways unanticipated.	It is common for air quality models to under-estimate concentrations compared to the monitoring data, which is why the verification process is so important. Adjusting the model results based on comparison with monitored values is standard practice, and is recommended in government guidance (LAQM.TG 16). The overall adjustment factor was 2.5 – which is within the usual range for adjustment factors. However, the factor required at C4 was higher than this, at 3.1. Under normal circumstances the overall factor would have been used. However, in this case adjusting by 2.5 would have resulted in the model NOT predicting any exceedances within the AQMA. It was considered to be appropriate to undertake a conservative assessment and so the higher adjustment factor was used. This resulted in exceedances being predicted further into the future.
7. <u>Analysis does not support No Right turn proposal</u>	
The analysis in the AQAP does not support the conclusion that banning right hand turns into Down Lane will achieve the required improvements.	
7.1 The queuing study undertaken was inconclusive as to whether there was in fact a queuing problem caused by the right hand turns into Down Lane (page 26). As we have advised you, there is a queuing problem, but it is nothing like the one hour the AQAP hypothesises. If we had been asked, we would have suggested that an average of no more than 30 minutes per day was the reality for traffic waiting to turn right into Down Lane. However, queues appear in Compton for two reasons and it is the second one which is more of a problem and banning a right turn into Down Lane will have no impact on this type of queue. These queues are due to congestion caused by the loop that is the A31, A3 and B3000. They can be due, firstly, to a hold up at the roundabout at the top of the slipway from Compton towards the A3, because of the volume of traffic coming across the A3 and turning right onto the A3 towards Milford and also into Priorsfield Road. This resulting inability of traffic to join the roundabout causes frequent queues back into Compton.	The smallest time period that can be modelled is one hour using ADMS dispersion modelling; hence the queue was modelled as present for one hour in the afternoon on a week day. The model being present for an hour as opposed to half an hour, again results in a conservative estimate of concentrations.

Consultee	Response
<p>The second reason is due to a build-up of traffic on Puttenham Heath Road heading towards Puttenham. The inability to turn left from the A3 northbound onto the A31 causes traffic to use the B3000 Puttenham Heath Road and the build-up in traffic at peak times results from the difficulty this traffic experiences in getting access onto the A31 from the B3000 at Puttenham. This quickly leads to the roundabouts on the A3 being blocked, leading to tailbacks into Compton.</p> <p>Timed print screens from Google Maps were taken which show that an accident at a peak time at the point on the A31 close to the new proposed access to the Blackwell Farm development, caused complete gridlock in Compton in under 8 minutes. The same level of congestion on this loop is shown as a “typical traffic” scenario (Fig 1) which occurs frequently at peak times. Fig 2 is a close up of Fig 1 to include B roads and Fig 3 is a snapshot at 5pm showing that the build-up of traffic at the roundabout has caused congestion in Compton.</p>	
<p>7.2 The data in Table 3 (page 12) say that banning right turns is targeted only to reduce pollution by 1 mcg per square metre whereas on page 6, third paragraph, it states that there is a need to reduce emission levels by 14.5 mcg per square metre. It is therefore clear from the figures in the AQAP that the only measure proposed is wholly insufficient - and that measure itself is based on a hypothetical queue which, as explained in 7.1, is probably double the reality.</p>	<p>The reduction in EMISSIONS required is 14.5 µg/m³ of NO_x – nitrogen oxides. The objective is based on NO₂ concentrations, and thus the target reduction is in NO₂ concentration – nitrogen dioxide.</p>
<p>7.3 In order to achieve full compliance, the AQAP assumes that there will be an additional, independent, reduction in the number of diesel cars using the road. This has been done by postulating future reductions in diesel emissions caused by changes over time in the composition of the vehicle fleet using the road (page 28) to support the alleged reduction to within legal limits. However, no account has been taken of potential increases in traffic through the village due to Guildford’s earmarked development schemes, particularly Blackwell Farm which is in the recently adopted Local Plan. The only reference in the AQAP to the effect of future development is an observation on page 13 (in response to an earlier Compton Parish Council comment), where GBC state that they will have little control and that this would need to be discussed with Surrey Highways. But this is factually incorrect, as GBC will have control over future increases in vehicles because the type of decisions that will affect Compton will largely be made by GBC planning department (such as Blackwell Farm or changes in the Guildford gyratory system). This important point is not discussed anywhere else in the document. Just because it is difficult to predict future traffic increases does not mean that they should be ignored. There must surely be data on the growth in traffic numbers over time from which one can make predictions. It is very likely that traffic will increase and the effect of this ought to be modelled, particularly so that the effects on pollution can be taken into account when considering whether to approve future planning applications.</p>	<p>The changes in vehicle fleet over time have been based on data published by Defra, and are used in all air quality assessments. A recent High Court Judgement (Clientearth No.3, v Secretary of State for Environment, Food and Rural Affairs & Ors [2018] EWHC 315 (Admin) (21 February 2018)) defended the Defra emission factors. The judgement supported the approach adopted by Defra by noting the use of an expert panel in the provision of guidance on this matter. Therefore, the judgement supports the use of these consistent with policy 5.8 of the National Policy Statement for National Networks, published in December 2014, as reproduced below:</p> <p>‘Defra publishes future national projections of air quality based on evidence of future emissions, traffic and vehicle fleet. Projections are updated as the evidence base changes. Applicant’s assessment should be consistent with this but may include more detailed modelling to demonstrate local impacts.’</p> <p>Therefore the Defra projections do take account of predictions of future technological improvements at the national scale and this is considered to be appropriate by the court.</p> <p>Traffic volume has not been increased in future years for a number of reasons. The predictions made in this assessment are only over the next few years, so traffic volumes are unlikely to increase significantly. Developments in the local plan will take place after the year in which the Objective is predicted to be reached.</p> <p>Any local development will have to assess the impacts of their scheme upon air quality, and particularly on the AQMA as the developments apply for planning permission.</p>
<p>8. <u>Comments on other measures discounted by GBC.</u></p>	
<p>8.1 On page 6, the report says that the priorities for the action plan include reduction of traffic flow and associated queuing and congestion. However, GBC have not put forward any proposals to reduce the number of vehicles using the Street and only very minor measures to deal with queuing (which as noted above do not address the main cause of the queues).</p>	<p>The comment about reducing flow has been removed from the air quality action plan.</p>

Consultee	Response
<p>8.2 In relation to Option 1 from the previous consultation (banning HGVs): even if these represent a small proportion of overall traffic, according to the figures quoted in the AQAP (although see paras 4 and 5 above regarding our concerns on their reliability), it is only necessary to reduce the emissions by 20%, not 100%, in order to meet the target, so banning HGVs could contribute significantly to this total. In addition, the proportion of HGVs may be underestimated due to the timing of the ANPR survey so close to the reopening of the road after the bridge works.</p>	<p>Heavy Duty Vehicles contribute just 10% to NOx emissions at 30 kph. Cars contribute 50%. It is very clear that the source of the problem does not stem from HDV emissions but from cars. Banning all HDVs would only go half way to solving the problem. It is also impractical to do so, and would need the support of SCC and Highways England.</p>
<p>8.3 What is the basis for the assumption by SCC (page 14) that moving some traffic elsewhere would also move the problem elsewhere? The problem is partly caused by traffic volume but also by factors which may not apply elsewhere, such as the proximity of houses to the road and topography, as Compton lies in a dip, close to the A3.</p>	<p>The issue at Compton is the traffic volume in combination with the proximity of Little Cottage to the road with the barrier of trees opposite. This does make the location particularly vulnerable to high concentrations of NO₂. Traffic would likely have to re-route through the AQMA in Godalming, which sees a higher population exposed to exceedances of the objective.</p>
<p>8.4 In relation to option 2 (20mph zone), it is not clear whether the rationale behind this proposal has been fully appreciated - namely that there is currently a high proportion of speeding, accelerating and braking traffic in this section of the road. Braking in particular adds to pollution levels. The intention behind the proposal of an enforced 20mph speed limit was to ensure a steady speed rather than the marked changes of speed currently taking place and also to regulate the traffic flow to reduce queuing at the roundabout. This was behind our proposal for Average Speed Cameras (ASCs) which, if properly enforced, would result in a steady speed and therefore reduced pollution. Hopefully, the police will review their current decision which is only to take accidents into account in determining whether ASCs are appropriate, as ASCs would also stop the chronic speeding in Compton, estimated to be more than 80% of the traffic passing through the village.</p>	<p>The addition of the queue has taken into account the changes in speed along the link. However, braking does not significantly influence NOx emissions, it increases particulate emissions, but particulates are not an issue in this case.</p> <p>Reducing the speed to 20mph would increase emissions, as shown by the modelling results.</p> <p>Police policy is not to support ASCs.</p>
<p>8.5 We are also concerned by the statement on page 24, section C4, that discussions with Surrey “have shown that there are no feasible mechanisms for reducing the number of diesel cars and LGVs”. The question has to be asked as to whether Surrey could be inappropriately prioritising the flow of traffic over meeting air pollution targets. This is in stark contrast to London where it has been recognised that to address air quality, the number of polluting vehicles needs to be decreased.</p>	<p>The main mechanism for reducing polluting vehicles in London is the Ultra-Low Emissions Zone. This puts a charge on highly polluting cars wanting to enter central London. This kind of scheme is not practicable on a small scale situation such as Compton. The infrastructure required to charge vehicles and enforce the zone would prohibitively expensive. In addition, it is likely that the majority of the people who would be affected would be the residents of Compton themselves. Improving the local fleet would make a significant impact on the AQMA, however, GBC can only encourage this, so improvements cannot be relied upon to provide the reduction in emissions required.</p>
<p>8.6 Responses to Compton Parish Council’s earlier suggestions (page 13) stated that there would be a follow up with Highways England to discuss signage taking traffic destined for Godalming off the A3 onto the B3000. Highways England looked at this several years ago and said the signage was historic and that they would change it. However, we understand that SCC prevented this from happening. In the light of the AQMA and the additional developments proposed, we believe that a review of this decision is necessary.</p> <p>SCC’s responses indicate that they do not support re-routing freight on the basis that the alternative route is longer. However, Google Maps show that the route to the car park on Flambard Way, Godalming via the B3000 is 7.5 miles and takes 17 minutes by car. The route via the A3 and Milford is 5.4 miles and takes 9 minutes. See Fig 4 and Fig 5.</p> <p>Removing A3 signage and altering ‘sat nav’ systems for lorries would seem to be an easy low-cost way to improve the situation.</p>	<p>The signing at the A3 / Priorsfield Road junction routing HGVs heading for Godalming via the B3000 is due to the low bridge on C23 Charterhouse Road. Furthermore, D96 Priorsfield Road itself between the junction with the B3000 and Hurtmore is unsuited for use by HGVs: due to the nature of the road, the HGVs and smaller vehicles such as cars and small vans have difficulty in passing each other at certain locations, and that is amplified when two HGVs require passing each other.</p> <p>Should HGVs be signed via Milford, this would result in about a further 2 kms needing to be travelled. (From the roundabout junction of the B3000 with Priorsfield Road, the distance via the B3000 and A3100 to the roundabout by the retail park off Woolsack Way is 7.35 kms, whereas the distance via the A3, A283 at Milford and A3100 is 9.25 kms) resulting in increased emissions and cost to the hauliers. In addition, any vehicles travelling to the north side of Godalming would have to pass through the AQMA in place along the A3100 (as shown in the attached).</p>
<p>9. <u>Ongoing Monitoring</u> We are a little confused about future monitoring. The report says (page i) that the AQAP outlines the action to be taken to improve air quality between 2019 and 2020 and on page ii, that it will be subject to an annual review, appraisal of progress and reporting to the relevant statutory committee. But a few pages later (page 1), the report</p>	<p>There are no plans to cease monitoring the air quality in Compton. The AQMA can only be revoked with the approval of Defra, and the demonstration that concentrations are consistently below the Annual Mean Objective. If the predicted improvements in air quality are not demonstrated, then further action will be taken.</p>

Consultee	Response
says that the Plan will be reviewed every five years at the latest and progress reported annually. Is this a set plan for 5 years, or if continued monitoring shows that the postulated improvements in air quality have not been seen, will further action be taken?	
10. <u>Summary</u>	
10.1 We believe the methodology is flawed in coming to the conclusion that banning right turns into Down Lane will solve the problem of the AQMA.	
10.2 No account is taken of proposed new developments in the area (eg Blackwell Farm) and the increased traffic this will generate.	These developments will come online after the point at which the concentrations are expected to drop below the objective. Monitoring will remain in place, and should concentrations increase again in future this will be investigated.
10.3 Removing A3 signage advising Godalming-bound traffic to use the B3000 and altering sat nav systems for lorries would seem to be a low-cost way to improve the situation.	
10.4 It is implicit in the GBC report that the only guaranteed way to reduce emissions is to reduce the number of vehicles. This is clearly missing from any proposed solution.	
10.5 We believe that ASCs should be part of the solution.	
Surrey Public Health, Surrey County Council	
<p>Thanks for sharing the AQAP. It is great to see the public health context and links to the PHE Public Health Outcomes Framework.</p> <p>Minor comment - please could you add 'Surrey' in front of 'Public Health' in the consultee list and Appendix A, so we don't get confused with Public Health England.</p> <p>The report mentions improving the cycling infrastructure in the 'Planning and Policy' and 'Key priority' sections, however in Appendix B does not include discussion as to why action is not being pursued in this area. I think I recall a discussion about the road not being suitable for a cycle lane, but it would be good to see it considered/articulated within the plan.</p>	<p>Noted</p> <p>The action plan has been amended to clarify.</p> <p>Due to the nature of the road and land adjacent to the road it is not suitable for improving the cycling infrastructure within the AQMA. Reference to cycling has been removed from the air quality action plan.</p>
Majors Team, Guildford Borough Council	
Thank you for consulting with us. I have read the revised draft AQAP with interest and have no comments or observations to make on behalf of GBC's Major Projects Team.	Noted
Environmental Health, Waverley Borough Council	
Thank you for the consultation on the revised Compton AQAP. We have the following comments:	The comments are noted.

Consultee	Response
<p>1) It is recommended that diffusion tubes are located on the façade of residential properties rather than kerbside to determine levels at the point of relevant exposure</p> <p>2) Any proposals to re-route traffic away from the B3000, e.g. restrictions on HGVs through Compton, should consider the impact on traffic flows/air quality on neighbouring roads that may include those in Waverley Borough Council, as well the potential impact on the AQMA in Godalming</p>	<p>Diffusion Tubes Ambient NO2 Monitoring: Practical Guidance is considered when locating diffusion tubes.</p> <p>The current proposal does not reroute traffic. The impact of rerouting has been and will continue to be a consideration in drafting the action plan.</p>
<p>Resident 1, Compton</p> <p>Thank you for your email attaching the revised action plan.</p> <p>From our review it seems that the proposed action is to ban right hand turns into Down Lane to reduce queuing. I don't think this will work because if you watch the queuing traffic they are queuing back from the round about and it's not that they are waiting to turn right. If someone is trying to turn right usually it's clear quite quickly or someone lets them across. We also live on Down Lane and we have no trouble turning right. The only time we wait on the road is if it's busy from the round about. Therefore although we don't object to this change I doubt it will make any difference in practice. In addition it could make traffic worse because sometimes you have to wait to approach the round about whereas at the moment people just turn right and don't wait in the queue.</p> <p>We still support options 1&2.</p>	<p>Noted.</p> <p>Noted. The impact of the measure will be reviewed to measure the impact.</p> <p>Noted. These measures were not supported by SCC Highways and modelling showed that they would not be effective in improving air quality.</p>
<p>Highways England</p>	
<p>Thank you for your email. I will read through and let you know if I have any comments.</p>	<p>No further comments received.</p>
<p>Councillor Ramsey Nagaty, Shalford Ward, Guildford Borough Council</p>	
<p>As the new Shalford Councillor I thought I would touch base regarding the AQMA at Compton.</p> <p>Thank you for the work you have done to date and the co-operation with Compton PC representative for traffic Ken Miller.</p>	<p>Noted</p> <p>The modelling anticipates that the elimination of the right-hand turn into Down Lane will reduce nitrogen dioxide levels making the area with compliant with the air quality standard. If the measures does not have the expected impact the AQAP will have to be reviewed to identify further measures.</p> <p>The signing at the A3 / Priorsfield Road junction routing HGVs heading for Godalming via the B3000 is due to the low bridge on C23 Charterhouse Road. Furthermore, D96 Priorsfield Road itself between the junction with</p>

Consultee	Response
<p>I do however feel the AQAP proposed is not strong enough and merely stopping right turns into Down Lane will not drastically reduce the air pollution experienced in Compton.</p> <p>Further I am surprised to see signs diverting HGVs from Priorsfield Road (low bridges) through Compton and the AQMA at the street / B3000.</p> <p>Surely these should go via Milford or alternative routes, not Compton due to the policy not to increase traffic through an AQMA.</p> <p>Appreciate your assistance in how to remedy this.</p>	<p>the B3000 and Hurtmore is unsuited for use by HGVs: due to the nature of the road, the HGVs and smaller vehicles such as cars and small vans have difficulty in passing each other at certain locations, and that is amplified when two HGVs require passing each other.</p> <p>Should HGVs be signed via Milford, this would result in about a further 2 kms needing to be travelled. (From the roundabout junction of the B3000 with Priorsfield Road, the distance via the B3000 and A3100 to the roundabout by the retail park off Woolsack Way is 7.35 kms, whereas the distance via the A3, A283 at Milford and A3100 is 9.25 kms) resulting in increased emissions and cost to the hauliers. In addition, any vehicles travelling to the north side of Godalming would have to pass through the AQMA in place along the A3100 (as shown in the attached).</p>

Godalming AQMA

KEY

— 40 mg/m3

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