

GUILDFORD BOROUGH COUNCIL AND
SURREY COUNTY COUNCIL



GUILDFORD
BOROUGH

GUILDFORD JOINT COMMITTEE

DATE: 11 DECEMBER 2019

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

SUBJECT: SHALFORD AIR QUALITY MANAGEMENT AREA – ACTION
PLAN

AREA AFFECTED: SHALFORD

SUMMARY OF ISSUE:

The report seeks approval of the Air Quality Action Plan for Shalford, which proposes introducing a number of measures to reduce nitrogen dioxide concentrations making the area compliant with the air quality standard. The measures include: school intervention programme, promoting easitGuildford (green travel network) and increasing electric vehicles in the fleet locally.

RECOMMENDATIONS:

The Guildford Joint Committee is asked to agree that

- (i) The Committee adopts the Air Quality Action Plan for Shalford in Appendix 1.

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 within the Air Quality Management Area in Shalford.

1. INTRODUCTION AND BACKGROUND:

- 1.1 A detailed assessment of air quality in Shalford during February 2019 found several residential properties close to the A281 at which levels of nitrogen dioxide exceed the air quality standard. The Borough 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.
- 1.2 On the 3 July 2019, Guildford Borough Council designated an Air Quality Management Area (AQMA) in an area of Shalford 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 Guildford Joint Committee 18 September 2019 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:

Draft Air Quality Action Plan

- 2.1 The draft AQAP developed by a technical officer steering group in conjunction with a consultant suggested that a number of measures are going to be required to have the necessary impact in the timescale required.
- 2.2 Both infrastructure and behaviour change measures were proposed within the draft AQAP for consultation. The measures consulted on were:
1. Park and Ride
 2. Priority at Pilgrims Way to people turning right
 3. Run a school intervention programme in Shalford
 4. easitGuildford Green Travel Network
 5. Increasing Electric Vehicles in the fleet locally
 6. Consider air quality at pre-application and application stages of planning process
 7. Joint working with Waverley Borough Council, particularly on large developments like Dunsfold
 8. Electric Bike Share Scheme – incorporate hub in Shalford
 9. Bid for low emission bus scheme (Defra grant) or Clean Bus Technology Fund to increase number of low and ultra-low emission buses in Guildford

Consultation

- 2.3 Public consultation on the draft AQAP was conducted from 19 September to 18 October 2019 using multiple channels to engage with the consultees listed below plus other interested parties.
1. 9 residential properties within the AQMA and adjoining area
 2. Surrey County Council Highways
 3. Ward Councillors and Surrey County Councillor
 4. Shalford Parish Council
 5. Waverley Borough Council
 6. Guildford Borough Council – Economic Development, Planning Policy, Major Projects, Parks and Leisure Service
 7. Highways England
 8. Public Health, Surrey County Council
 9. Local businesses – Cranfield Freight Ltd and 3 bus companies
- 2.4 Letters were sent to residents within AQMA boundary and adjoining properties and emails were sent to all other consultees listed. Guildford Borough Council also published details of the consultation on its website.
- 2.5 Two walk-in sessions were held in Shalford between 10am to 1pm on 27 September 2019 and 6pm to 9pm on 3 October 2019 to give consultees the opportunity to talk to officers about the proposals. In total there were 11 consultation responses received.

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- 2.6 The technical officer working group met to discuss the consultation responses and agree the measures to be proposed in the AQAP. Full consultation responses can be seen Appendix 4 including responses.

1. Park and Ride

- 2.7 There was positive support from most consultees about the introduction of a park and ride scheme in Shalford. As there appeared to be strong support for this option officers made some initial enquiries about the costs, time period for introducing a park and ride scheme and the likely air quality impacts during the consultation period.

- 2.8 After careful consideration the option of introducing a park and ride scheme has been discounted as a measure in the AQAP as the scheme could not be introduced before the AQMA becomes compliant with nitrogen dioxide air quality limits and currently funding is not available for the introduction of the scheme.

- 2.9 Whilst the park and ride scheme will not be pursued within the AQAP, it is possible that it could be progressed separately if the appropriate funding become available as the park and ride could help encourage modal shift across a wider area. Officers will discuss opportunities to implement a park and ride scheme outside the AQMA process with Councillors, relevant internal and external partners and colleagues in Waverley Borough Council. An update will be provided to the Joint Committee.

2. Priority at Pilgrims Way to people turning right

- 2.10 Consultees all agreed that this measure would be ineffective and not make a significant impact on queuing within the AQMA as it is approximately 600 metres from the area and would encourage diversions and cut throughs onto other roads. Therefore, the measure of changing the right turn into Pilgrims Way has been discounted following consultation.

3. Run a school intervention programme in Shalford

- 2.11 There was a great deal of support for a school's intervention programme to encourage modal shift and support changing behaviours. The measure will be included in the AQAP and will be expanded following consultation feedback.

- 2.12 Consultees provided valuable information about opportunities to include Tillingbourne Junior School and fee-paying schools attended by local children within any measures taken. Introducing a walking bus or shuttle between Shalford and Tillingbourne schools was suggested by multiple consultees.

- 2.13 Tillingbourne School will be invited to participate in the school air quality project currently being run in partnership between Surrey County Council and a number of Surrey Local Authorities including Guildford Borough Council.

4. easitGUILDFORD Green Travel Network

- 2.14 Following positive feedback easitGuildford, the green travel network, will remain a measure in the AQAP. Respondents suggestions to include Cranleigh Freight Services and other local businesses will be explored along with encouraging Shalford residents working within the Borough of Guildford to get their employer to sign up to the network.

5. Increasing Electric Vehicles in the fleet locally

- 2.15 Overall respondents were positive on increasing the electric vehicle fleet and charging network however there were concerns around costs associated with the technology and the rate of take up.
- 2.16 The measure will remain in the AQAP as there are opportunities with the Surrey County Council and Guildford Borough Council project and to promote government grants available to residents and businesses for installation of charging infrastructure.

6. Consider air quality at pre-application and application stages of planning process

- 2.17 Consultees agreed that air quality is an important consideration during the planning process so the measure will remain in the AQAP. Air quality will continue to be considered at the application stage and additional steps can be implemented to ensure it is fully evaluated at the prep-application.

7. Joint working with Waverley Borough Council, particularly on large developments like Dunsfold

- 2.18 Continued joint working with neighbouring Local Authorities was supported by respondents and will remain as a measure in the AQAP. Officers to pursue funding opportunities for measures from Waverley Borough Council.

8. Electric Bike Share Scheme – incorporate hub in Shalford

- 2.19 There were mixed replies from respondents about the opportunity for an electric bike scheme hub in Shalford. Whilst some were positive others had concerns about the feasibility of the scheme particularly with inadequate local cycle tracks. Officers within the technical working group also reported that Shalford had not been identified as a hub within the Guildford bike scheme due to insufficient redistribution of bikes.

- 2.20 Following consideration of the feedback from respondents and the technical officer working group an electric bike hub in Shalford has been removed as a measure in the AQAP.

9. Bid for low emission bus scheme (Defra grant) or Clean Bus Technology Fund to increase number of low and ultra-low emission buses in Guildford

- 2.21 The measure will remain in the AQAP as respondents were positive about improving the emissions from buses passing through the AQMA.

- 2.22 Guildford Borough Council can encourage bus companies to bid for Government grants to make improvements to the bus fleet however there are barriers such as 'state aid' which can prevent our involvement.

Alternative measures suggested by consultees

- 2.23 The technical officer working group considered the alternative measures suggested by consultees, after evaluation a number have now been included in the AQAP.

Right turn ban onto East Shalford Lane

- 2.24 Banning the right hand turn into East Shalford Lane to reduce queueing and keep the traffic flowing was suggested by a number of the consultees as a possible measure to improve air quality within the AQMA.

- 2.25 The technical officer group proposes adding this as a measure to be explored within the AQAP. A turning count survey has been commissioned to help establish the use of the road and the potential effectiveness of the measure.

- 2.26 Amplifying the congestion and air quality at Pilgrims Way and difficulties accessing to properties on East Shalford Lane and the cul-de-sac section of Tilehouse Road are potential issues with the measure. The potential for increased collision, for vehicles who would be prohibited from the right turn, would not wish to travel the additional distance to Pilgrims Way and join the potential queue, and who may well carry out inappropriate U turns in the St Mary Church access all need to be evaluated.

Additional train stops at Shalford train station particularly at peak hours

- 2.27 Campaigning for additional train stops at Shalford station has been added to the list of measures in the AQAP as multiple respondents stated that increased trains particularly at peak hours would encourage use.

Increased frequency of buses to Guildford

- 2.28 A number of respondents wanted to see more buses so campaigning for increased buses through Shalford has been added to the list of measures in the AQAP.

Thames Water and Cranleigh Freight Services vehicle movements

- 2.29 Thames Water and Cranleigh Freight Services contribution to the exceedance were both mentioned in a consultation response. There is no evidence to suggest that Thames Water or Cranleigh Freight Services need to be specifically targeted however they can both be included when approaching local businesses about easitGUILDFORD.

Low emissions zone

- 2.30 A low emission zone (LEZ) has been rejected as a potential measure as a LEZ in Shalford would redirect traffic through other AQMAs in Godalming and Compton and a LEZ is not suitable for a straight-line exceedance such as the one along the A281 in Shalford.

Improve the cycle off road track in the vicinity of Dagley Lane

- 2.31 A number of responses suggested an improved off-road cycle path between Shalford and Guildford would encourage cyclist. Whilst there is currently no funding to improve the cycle way in the vicinity of Dagley Way, the officer group consider adding this option is worth exploring as part of the AQAP.

Reduce speed limit to 20mph through AQMA

- 2.32 There is no evidence to suggest that this measure would improve air quality within the AQMA. This option was considered in detail during the development of another AQAP for Compton and excluded due to lack of evidence.

Bus and train discounts for residents

- 2.33 Train and bus discounts for residents was suggested as an option by consultees. Securing lower fares may incentivise users so campaigning to secure discounts on has been added to the AQAP.

- 2.34 The revised table of measures to be included in the AQAP can be seen at Table 5.2 of Appendix 1.

3. OPTIONS:

- 3.1 As Guildford Borough Council are under a statutory duty to adopt an Air Quality Action Plan for the AQMA in Shalford, 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 Shalford in Appendix 1.
2. Adopt a modified version of the Air Quality Action Plan for Shalford 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 on the revised AQAP after public consultation has taken place with senior officers and Lead Member for Air Quality; Councillor Caroline Reeves, Guildford Borough Council, who supports the adoption of the AQAP. The county member for Shalford and Cabinet Member for Highways Councillor Matt Furniss and Councillor Councilor Mike Goodman, Cabinet Member for Environment have also been sent the draft report.

- 4.2 We have briefed the borough ward members for Shalford, Councillor Chris Blow and Councillor Ramsey Nagaty. Councillor Nagaty supports the adoption of the AQAP but is disappointed the Park and Ride scheme has not been included as he feels this would be an effective measure to improve air quality.

Legal Implications

- 4.3 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.
- 4.4 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).
- 4.5 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.
- 4.6 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's contribution to the school intervention has been paid from existing budget.
- 5.2 A number of the measures can be delivered within existing resource but any additional funding required would have to come from grants, other organisations or we would need to put in a growth bid/supplementary estimate such as improvements to cycle paths.

6. WIDER IMPLICATIONS:

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

Area assessed:	Direct Implications:
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
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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 the AQMA along a section of the A281 in Shalford, consultation on a draft AQAP to improve air quality and meet the air quality objectives in the area was conducted. Following consultation the draft was revised, both removing and adding a number of measures.

7.2 A full response was provided to all the consultees which aims to provide reassurance that their responses have been given full consideration and the AQAP will be reviewed if the measures identified are not successful.

7.3 Officers recommend Option 1, as if implemented these measures 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 AQAP, subject to funding.

8.2 The impact of the measures in reducing nitrogen dioxide levels will be monitored throughout the year by the diffusion tube data followed by a formal review in 2021 and each subsequent year which will be reported in Guildford Borough Council's Annual Status Report to DEFRA. The effectiveness of the measures will be reviewed if nitrogen dioxide levels are not reducing sufficiently.

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

8.4 When there is no longer an exceedance of the air quality standard for nitrogen dioxide the Council can submit evidence to DEFRA for the AQMA to be revoked.

Contact Officer:

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Consulted:

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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 – Shalford Air Quality Action Plan
- Appendix 2 – Shalford Air Quality Management Area Order
- Appendix 3 – Map of Air Quality Management Area
- Appendix 4 – Consultation responses and comments

Background papers:

- Guildford Joint Committee, 3 July 2109
<https://mycouncil.surreycc.gov.uk/ieListDocuments.aspx?CId=751&MId=7100&Ver=4>
 - Guildford Joint Committee, 18 September 2019
<https://mycouncil.surreycc.gov.uk/ieListDocuments.aspx?CId=751&MId=7101&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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