

**GUILDFORD BOROUGH COUNCIL AND
SURREY COUNTY COUNCIL**



GUILDFORD JOINT COMMITTEE

DATE: 29 JUNE 2022

LEAD OFFICER: GARY DURRANT, SENIOR SPECIALIST – ENVIRONMENTAL PROTECTION, REGULATORY SERVICES MANAGER, GUILDFORD BOROUGH COUNCIL

SUBJECT: GUILDFORD TOWN CENTRE AIR QUALITY MANAGEMENT AREA – ACTION PLAN

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

SUMMARY OF ISSUE

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

To meet our statutory duties, the Council has produced a draft Air Quality Action Plan (AQAP) which identifies measures to improve air quality within the AQMA. The draft AQAP outlines a series of proposed measures to mitigate the air quality exceedance of nitrogen dioxide.

It is proposed to the Joint Committee that a 4-week public consultation on the draft AQAP for the Guildford Town Centre Air Quality Management Area (AQMA) is approved.

RECOMMENDATIONS

The Joint Committee (Guildford) is asked:

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

REASONS FOR RECOMMENDATIONS

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

1. INTRODUCTION AND BACKGROUND

1.1 BACKGROUND

- 1.1.1 The Guildford Town Centre Air Quality Management Area (AQMA) was approved and adopted on 21 October 2021 by the Joint Committee due to the breach of national air quality objective for annual mean of nitrogen dioxide. The extent of the AQMA is the bold purple area shown in Appendix 1.
- 1.1.2 The detailed air quality assessment carried out by Air Pollution Services (APS) the Council's contracted air quality consultants in support of the declaration of the AQMA, concluded that the exceedance was attributable to emissions from road traffic.
- 1.1.3 To meet our statutory duties following the declaration of the AQMA, the Council has produced a draft Air Quality Action Plan (AQAP) which identifies measures to improve air quality within the AQMA. The proposed timescale for the action plan measures is from 2022 to 2027.
- 1.1.4 The draft AQAP outlines a series of proposed measures to mitigate the air quality exceedance of nitrogen dioxide, which will be taken to a public consultation in July 2022. The measures are set out in detail in the draft AQAP report produced in conjunction with APS which can be found in Appendix 2 of this report.
- 1.1.5 The draft AQAP brings together Guildford Borough Council, Surrey County Council services and external organisations with a target of working towards achieving the national air quality objectives within the Guildford Town Centre AQMA.
- 1.1.6 As it is unlikely that any one measure will achieve compliance with the national air quality objectives for nitrogen dioxide, a total up to 30 proposed actions will need to be carried out during the period of the plan 2022 to 2027. The basis for the measures has been explained in outline in this report, with further detail in the draft AQAP Appendix 2. As the report describes, the delegations and responsibility for the measures have a large dependence on Surrey County Council as the local highway authority.
- 1.1.7 It is also anticipated that any improvements in air quality policy and awareness of local air quality issues, will bring about cleaner air and sustainable development on a borough-wide basis. This is particularly relevant to introduce actions to control emissions from any future planned development within the town centre and surrounds.
- 1.1.8 The draft AQAP will be subject to statutory consultation and engagement, plus a public consultation with residents, businesses, and users of the town centre.
- 1.1.9 After the consultation is completed a revised report on the results of the consultations and a revised draft AQAP will be reported to the Joint Committee 26th October 2022. Subject to approval, the final AQAP will be submitted to Defra after the decision.

1.2 LOCAL AIR QUALITY MANAGEMENT

- 1.2.1 The Part IV Environment Act 1995 introduced the current system for Local Air Quality Management and requires every Local Authority to carry out a review of the current air quality and the likely future air quality within its area.
- 1.2.2 In carrying out the review, the Local Authority must assess whether air quality standards and objectives are being achieved or are likely to be achieved. The objectives are set out in the Air Quality (England) Regulations 2000, as amended by the Air Quality (England) (Amendment) Regulations 2002 and the UK Air Quality Strategy (DEFRA 2007).
- 1.2.3 To determine if there is an exceedance of the nitrogen dioxide (NO₂) objective at any location in the Borough a monitoring network of approximately 40 passive diffusion tubes, established for over 20 years, is in operation. We review the sites periodically to ensure we are monitoring in locations that could potentially exceed air quality objectives and meet the criteria specified in the Defra technical guidance.
- 1.2.4 The Government's Air Quality Strategy objectives and limit values for NO₂ are:
- an annual mean concentration of 40 µg/m³; and
 - a one-hour mean concentration of 200 µg/m³, not to be exceeded more than eighteen times per year.
- 1.2.5 If there are breaches or predicted breaches of air quality objectives the Council is legally required to designate an air quality management area (AQMA) under Section 83 of the Environment Act 1995.

2. ANALYSIS

2.1 Detailed Air quality Assessment

The detailed assessment and prediction of annual mean NO₂ concentrations was carried out by APS using the ADMS-Roads atmospheric dispersion model (v5). It is a validated package that is used throughout the country and is an accepted tool used by many local authorities.

- 2.1.1 The results suggest that there are potential exceedances of the annual mean or 1-hour NO₂ Air Quality Objective (AQO) at the following five roads:
- Onslow Street – Although predicted concentrations exceed the annual mean NO₂ AQO, there is no relevant exposure on this street. Any future development plans must be considered for suitability if relevant exposure is introduced.
 - Bridge Street: Potential exceedances of the 1-hour mean NO₂ AQO (of 200 µg/m³) have been predicted along the pavement. The street is also regularly used as a main throughfare for users of the train station (the exposure applies only to those who may be in the outside area for over an hour)

- Millbrook (A281) – Exceedance of the annual mean NO₂ AQO has been predicted at several properties along this road.
 - Commercial Road – There are currently no relevant exposures on this road; however, there are potential redevelopment proposals including residential use currently being considered for the submission of planning applications. This area also contains the current bus station, it is anticipated that it will undergo substantial change during the period of the AQAP.
 - Park Street – Concentrations have been predicted to exceed the annual mean NO₂ AQO. The relevant exposures are only located to the west side of the Park Street.
- 2.1.2 There are approximately 300 residential properties with accommodation at various levels above ground within the AQMA. The housing stock is made up of approximately 100 flats above commercial premises including 63 in Friary House, approximately 90 houses mainly in Guildford Park Road and the remainder purpose-built flats and apartments. All residential properties will be written to and requested to comment on the AQAP.
- 2.1.3 In addition, within the AQMA and likely to be developed within the term of the AQAP; there is planning approval on the Guildford Plaza (Planning reference: 21/P/01811), Portsmouth Road for up to 301 residential units; and the Old Debenhams (Planning reference: 21/P/02232), Millbrook site has 215 residential units proposed, the application is as yet to be determined.
- 2.1.4 Near to the AQMA is the approved Guildford Railway Station, Station View (Planning reference: 14/P/02168) development for 438 residential units and the application for 124 residential units on Land South and East of The Cathedral Church of The Holy Spirit, Stag Hill, The Chase (Planning reference: 21/P/02333) is to be determined.
- 2.1.5 It is important to note that consideration must be given to any outside areas of land or amenity where the public may be exposed to air pollution for over an hour. The AQMA adjoins or covers the Friary Shopping Centre, Guildford main line railway station, the bus station, the Yvonne Arnaud Theatre, the commercial shopping areas of High Street and North Street, plus the licensed premises in the Bridge/ Onslow Street areas. The public consultation will involve the operators of any premises where external exposure is likely to be over an hour, for example open air seating or dining areas.
- 2.1.6 It is important to acknowledge that the AQMA is within the part of the area covered by the Shaping Guildford's Future project, therefore it is anticipated that any plans/initiatives are coordinated with the draft AQAP and vice versa. This also applies to any plans or proposals to create pedestrian areas, alter traffic patterns, relocate the bus station, and introduce new receptors. As it is not yet known whether any of the proposals will be introduced during the compliance period of the AQAP, they will not be discussed in this report. Any substantial changes will however need to be reported to Defra in the Council's Air Quality Annual Status Reports, which are submitted at the end of June.

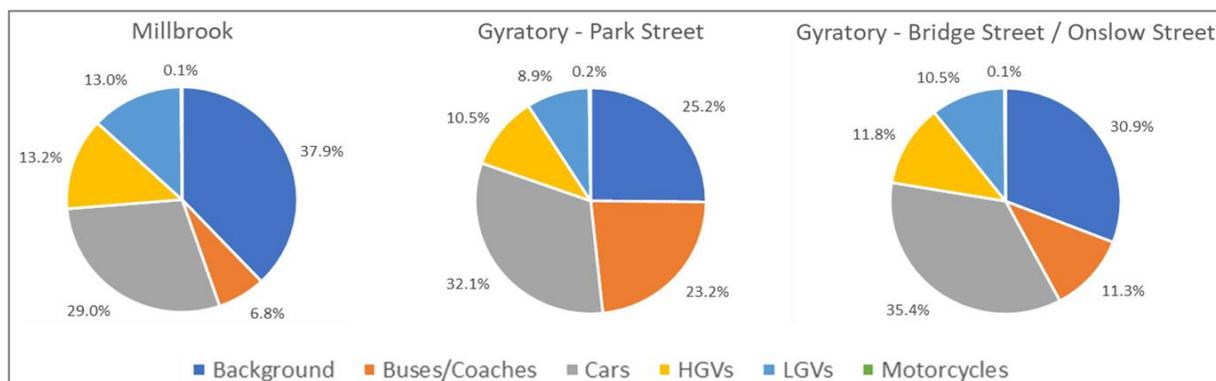
2.2 Source and Scale of Exceedance

- 2.2.1 Understanding the source and scale of the nitrogen dioxide (NO₂) exceedance, is critical to developing an effective AQAP.

2.2.2 The Draft AQAP is intended to target the predominant sources of emissions within Guildford Town Centre. The main source of emissions in Guildford Town Centre are emissions from road traffic.

2.2.3 The figure 2 from APS report identifies that while a large proportion of NO₂ concentrations locally is caused by emissions from cars, HGVs, LGVs and buses also contribute significant proportions.

Figure 2 Source apportionment (extracted from APS detailed assessment)



2.3 Required reduction in emissions

2.3.1 The highest annual mean NO₂ concentration has been predicted at Park Street (60.9 µg/m³). To achieve compliance with annual mean objective level of 40 µg/m³ at this location, 57% reduction in local road traffic emissions is required (table 3.1 of APS report, presented below in table 1).

Table 1 Improvements in Annual Mean NO₂ and NO_x Concentrations Required in 2019 to Meet the Objective

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

2.4 Predicted compliance

2.4.1 The air quality modelling using ADMS-Roads atmospheric dispersion model (v5) by APS, predicts that both receptors and/or locations where the exceedances occur within the AQMA will become compliant without intervention sometime between 2025 and 2028. Any measures proposed by the Council must be implemented before these dates and therefore the proposed period for the AQAP measures is 2022 to 2027. These dates will be reviewed to validate the modelled predictions and are reliant on the

continuing local diffusion tube monitoring data providing up to date information.

2.5 Key Priorities for Draft AQAP

2.5.1 The draft AQAP identifies key priorities to consider when identifying measures that are likely to be effective:

- a) Most emissions arise from cars between 25 and 38% depending on the location within the AQMA, with some contribution from LGVs and HGVs.
- b) There is no decipherable contribution from point sources (such as chimneys or fixed installations) or any industrial process.
- c) There is a small contribution from buses.
- d) Any measures which will take longer than between 2025 and 2028 to implement and have effect, are unlikely to bring forward compliance with the air quality objectives.
- e) The background source component comprises emissions from the following sectors:
 - o Domestic
 - o Commercial
 - o Other transport sources
 - o Other minor roads

2.6 Development of AQAP measures

2.6.1 The evidence suggests that a combination of several measures will need to be implemented to have the necessary impact, within the timescale required to meet full compliance over the period 2022 to 2027. A total of 29 measures have been outlined in Table 4.3 of the draft AQAP report.

2.6.2 The measures proposed for consideration are under the following headings, they include:

- a) Alternatives to private vehicle use (bus-based park and ride and agile/flexible working)
- b) Freight and delivery management (use of hubs with only low emission vehicles and restricting HGVs)
- c) Policy guidance and development control (air quality supplementary planning guidance for developers, informal guidance for developers)
- d) Promoting low emission transport (taxi licensing conditions, electric cycle scooter hire scheme)
- e) Promoting travel alternatives (promotion of cycling and walking with low pollution maps, facilitate and promote agile working with air quality as a focus, promotion of travel choices)

- f) Public information (improve Guildford Borough Council air quality webpage information, schools air quality programme, Air Alert (a scheme which sends alerts to subscribers when air pollution levels are high), Parking App (an application which directs motorists to the nearest car park and highlights electric vehicle charging facilities)
- g) Transport planning and infrastructure (road strategy schemes to tackle congestion and tools to assess traffic management). These would be part of measures introduced in a Clean Air Zone, explained below in section 2.7.3.
- h) Traffic management (reduction of speed limits, HGV ban at certain times, traffic control centre monitoring, traffic incident management, anti-vehicle idling, bus stop clearways) These would be part of measures, explained below in section 2.7.3.
- i) Vehicle fleet efficiency (sustainable procurement guidance)
- j) Additional and accessible electric charging facilities for all categories vehicles on public and private land.

2.7 List of AQAP measures and Scoring

2.7.1 The list of proposed measures shown in Table 4.3 of draft AQAP were set out accordance with DEFRA's LAQM Policy Guidance (PG16), further assessment is shown in table 4.4 where each option is scored for the following parameters and ranked for their feasibility of implementation:

- Cost to implement
- Timescale to implement
- Practical feasibility
- Deliverability
- Value for money
- Public buy-in
- Political buy-in
- Potential reductions in NO₂

2.7.2 When considering which to implement, it is important to consider whether they are likely to be viable economically within the timescales of achieving improvements. If measures will not have any effect until after 2027 then they will not help to revoke the AQMA. Table 4.5 of the draft AQAP sets out which authority would be responsible, the potential funding that may be utilised to implement and viability of achievement for each measure.

2.7.3 Appendix C of the draft AQAP contains preliminary details of highlighted specific measures, which have a geographical element and entail significant

cost and/or legal authority to implement. The full details are in Appendix C, however for the benefit of further discussion they are summarised below:

a) **Reduction of speed limits, 20mph zone**

- The imposition of a 20mph speed limit across an area from of the railway bridge on the A322 in the north, to the junction with Quarry Street and the A281 in the south, and from the Egerton Road/A3 junction in the west to the London Road/ Clandon Road junction in the east is recommended.
- **Benefits:** The benefits are that it may improve traffic flows and encourages a modal shift in terms of making the area less attractive to through traffic.
- **Barriers:** The use of 20 mph restrictions will need to be quantified on a local basis as it may only be beneficial on certain roads. Restriction may displace traffic to other sensitive locations.
- **Enforcement:** Not intended to enforce by using cameras or traffic calming measures.
- **Other considerations:** Informal discussions have introduced the potential for Low Traffic Neighbourhoods or Liveable Neighbourhoods as an alternative. No informal or formal assessment has taken place of these options.
- **Responsible authority:** SCC

b) **HGV ban around the gyratory during peak and interpeak hours**

- Banning heavy goods vehicles (HGVs) from travelling through the AQMA during the hours 07.30 to 18.30. (Local access for deliveries is exempted)
- **Benefits:** The benefits are to that it will reduce emissions by removing HGVs at the busiest times as through traffic. It will also benefit the Shalford AQMA.
- **Barriers:** The HGV through traffic may use alternative routes, which may impact on other areas including the AQMAs at Compton in Guildford and Godalming in Waverley and may worsen the air quality at other sensitive locations.
- **Enforcement:** Not intended to enforce by using cameras.
- **Responsible authority:** SCC

c) **Electric Vehicle deliveries, local delivery hubs**

- Setting up local hubs to enable deliveries to be made by low emission vehicles
- **Benefits:** The benefits are deliveries can be made to a hub in a less sensitive location, with distribution in the AQMA via low emission vehicles. The hub can also be used for charging of other electric vehicles. It may also be suitable for a joint initiative with National Highways and the distribution companies.
- **Barriers:** The location of the hub is likely to be of concern, in that it will generate more traffic for that area and there may also be additional concerns regarding noise and operating hours.
- **Enforcement:** None required.
- **Responsible authority:** SCC and GBC, possible involvement of National Highways.

d) **Anti-vehicle idling measures**

- Ensuring that stationary vehicles in areas most at risk do not leave engines idling.
- **Benefits:** The benefits of reducing emissions by introducing anti-idling are simply that an idling engine is an unnecessary emission.
- **Barriers:** Enforcement is likely to be a challenge as it will require specialist staff resources from other services. The emphasis would be on signage in certain focussed areas such as the taxi ranks and bus station utilising good practice, with increased provision of electric vehicles charging facilities at the key locations.
- **Enforcement:** Vehicle idling is an offence under the Road Traffic (Vehicle Emissions) (Fixed Penalty) England Regulations 2022. Where any part of the area of a local authority is for the time being designated as an air quality management area in accordance with section 83, that authority may apply to the Secretary of State to be a designated local authority.
- Responsible authority: GBC

e) **Clean Air Zone Class A, B, C or D**

A Clean Air Zone (CAZ) is an area where targeted action is taken to improve air quality and resources are prioritised and coordinated to shape the urban environment in a way that delivers improved health benefits and supports economic growth. *Reference to the Clean Air Zone Framework, Principles for setting up Clean Air Zones in England: February 2020 (9).*

- (i) Clean Air Zones bring together:
- Immediate action to improve air quality and health
 - Support local growth and ambition
 - Accelerate the transition to a low emission economy
 - Introduce access restrictions to encourage cleaner vehicles
- (ii) CAZ Proposal: It is proposed that an area equivalent to the AQMA in which only vehicles that achieve a specified emission standard can enter without having to pay a charge. There are four types of CAZ:
- CAZ Class A- Buses, coaches, taxis and private hire vehicles
 - CAZ Class B- Buses, coaches, taxis, private hire vehicles and HGVs
 - CAZ Class C- Buses, coaches, taxis, private hire vehicles, HGVs, vans and minibuses
 - CAZ Class D- Buses, coaches, taxis, private hire vehicles, HGVs, vans, minibuses, cars and motorcycles
- (iii) For guidance APS have shown a CAZ B boundary in Figure 7 of the AQAP, it is however recommended that all four options should be considered at this consultation stage.
- (iv) Benefits:**
- The benefits of reducing emissions by excluding high emission and encouraging cleaner vehicles is likely to significantly improve air quality.
 - Implementation at an early stage would bring about a change in emphasis in the area supporting local plans for growth.
 - It will assist with land use planning in terms of local plans, development control and policy guidance.
 - There are numerous options around charging, hours of operation, phasing and size of the zone.
 - CAZs support innovation and to work with businesses and academia. The University of Surrey continue to express their interest in this topic.
 - The CAZ will help support some of the smaller measures mentioned in the AQAP.
- (v) Barriers:**
- A detailed cost/benefit analysis of each option will need to be carried out to decide the most effective and economic solution.

- The ability for charging authorities to introduce a Clean Air Zone is set out in the Transport Act 2000. Part III of the Act empowers local authorities (as “charging authorities”) to make a local charging scheme in respect of the use or keeping of motor vehicles on roads.
- Any restrictions in this area will need to be gauged with impact on other neighbourhoods and AQMAs.
- The responsible authority is SCC function, to date no CAZs operate in Surrey and GBC have no powers under Traffic Act 2000.
- As mentioned in the Appendix C of draft AQAP report those CAZs that operate in other metropolitan areas are not related to national air quality objectives, they follow air quality limit values which refer to a stricter criterion. Officers believe this is a viable proposal for an AQMA, as the Clean Air Zone Framework Guidance (9) clearly states that amongst the minimum requirements a CAZ must be; *in response to a clearly defined air quality problem, seek to address and continually improve it, and ensure this is understood locally.*

3. OPTIONS

- 3.1 There are three options available after considering the information in this report:
- 3.1.1 Approve a 4-week consultation on the draft Air Quality Action Plan shown in Appendix 2.
- 3.1.2 Approve an amended version of the draft Air Quality Action Plan shown in Appendix 2 for a 4-week consultation.
- 3.1.3 Reject the draft Air Quality Action Plan and ask officers to draft a revised version for consideration at a future meeting.
- 3.2 Understanding the nature of the issue has helped ensure appropriate measures have been identified and involving partners means different knowledge and perspectives have contributed to the development of the AQAP.
- 3.3 Officers recommend Option 3.1.1. During the consultation period there will be the opportunity for all the interested parties to provide feedback on the draft AQAP which will be fed back to the Joint Committee.

4. CONSULTATIONS

- 4.1 A number of partners are involved in the AQAP process and the roles of the main bodies are set out below. Please note that whilst this list is comprehensive, comments and feedback from other interested parties (any individual, organisation, or commercial body) are also considered while drafting an AQAP.

4.1.1 Surrey County Council

Surrey County Council (SCC) as the highway authority are responsible for the roads within the AQMA, as many of the mitigation options set out in the action plan relate to highway and transport matters these are best achieved in partnership. They include:

- Highway planning on all roads outside of the main trunk roads (A3 and M25) including routes, speed and road restrictions, low emission, and clean air zones.
- Local highway management.
- Bus services in partnership with the relevant companies.
- Alternative transport planning including cycling/walking networks and electric vehicle charging facilities.
- Public health within the SCC remit, which complements the GBC role.

4.1.2 Guildford Borough Council

Guildford Borough Council (GBC) has several disciplines who are key stakeholders and would provide pivotal roles in the delivery of the AQAP. The relevant services are listed below:

- Environment and Regulatory Services including Environmental Health, Licensing and Public Health functions.
- Planning Policy Services including Transport and Policy Planning.
- Place Services including Planning Development and Building Control functions
- Operational Services including Car Parks, Fleet Management, Street Cleansing and Waste Collection.
- Asset Management Services which cover Climate Change and the Council's property portfolio.
- Strategic Services including Communications and Regeneration and Infrastructure Programmes

4.1.3 External stakeholders

In addition, there are several other stakeholders and/or authorities, which need to be involved in the process and will be invited to comment at the public consultation stage, they include:

- National Highways who are responsible for the major highways including the A3 trunk road.
- The Environment Agency who are responsible for emissions from fixed installations.
- The National Trust (Wey Navigation) who maintain the public areas and regulate the craft permitted to use the River Wey, which runs through the AQMA.

www.surreycc.gov.uk/guildford

- Experience Guildford forms a vital link with the commercial concerns within and near to the AQMA.
- Network Rail in that mainline station is adjacent to the AQMA and the opportunities to enhance use of alternative forms of transport are important.
- Waverley Borough Council as the neighbouring authority with boundaries within 2 miles of the AQMA and sharing many of the roads leading into the area.

4.2 The AQAP Steering Group

- 4.2.1 On 29 November 2021, a workshop was held with Guildford Borough Council wider services to explore:
- a) Connections with other Council services
 - b) Existing or forthcoming projects/schemes that contribute to improving air quality in the town centre
 - c) Considerations/impact with other Council projects/initiatives including timelines of reports etc
 - d) Ideas for potential measures to be included in the AQAP
- 4.2.2 A technical officer steering group was set up to develop the draft AQAP in conjunction with APS, the contracted air quality consultants for this project.
- 4.2.3 Officers in the group were from GBC Planning Policy Transport Services, Regeneration and Infrastructure Programmes, Operational Services, Environment and Regulatory Services, plus Highway and Transport Planning officers from SCC. Waverley Borough Council being the neighbouring authority was also invited to attend and comment on the draft AQAP.
- 4.2.4 Meetings are scheduled held approximately every six to eight weeks with the first occasion being on the 9 March 2022. The Steering Group will continue to meet to oversee the development and implementation of the AQAP. As the plan is dynamic, and likely to be subject to change for a variety of reasons such as new development and policy, it is vital that there is ongoing representation across all relevant GBC and SCC services.

5. LEGAL IMPLICATIONS

- 5.1 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.
- 5.2 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.

- 5.3 Under Section 84 of the Environment Act 1995, the Council is required to produce an action plan following designation of the AQMA. Guidance states that the action plan should be produced within 12 months of designation which is no later than 20 October 2022. The intended date of submission is likely to be the 30 October 2022, officers of the Council have informed Defra.

6. FINANCIAL AND VALUE FOR MONEY IMPLICATIONS

- 6.1 Currently there are no immediate financial implications with the assessment and air quality action plan (AQAP) being produced within budget. The proposed measures will however present significant financial challenges that will need to be addressed through the following routes:

6.1.1 Bids for internal funding

6.1.2 Defra Air Quality Grant Programme which is designed to assist local authorities with statutory duties.

6.1.3 The Air Quality Grant Programme provided £11.6 million pounds to local authorities in 2022 and bids will need to be submitted in November/December 2022: <https://www.gov.uk/government/collections/air-quality-grant-programme>

6.2 Subject to the draft AQAP, subsequent consultation and approval of the final action plan finance will need to be secured, as it is anticipated that additional resources will be required to implement the measures approved in any action plan. Approximations on costs have not been provided in the AQAP, as they have not been subject to full appraisals including cost/benefit analysis or any other economic evaluations.

7. EQUALITIES AND DIVERSITY IMPLICATIONS

7.1 It is anticipated that the proposed measures to improve air quality may benefit those individuals who already suffer with bronchial ailments such as asthma, additionally actions to improve air quality may present equal chance for everyone to benefit from cleaner air.

7.2 Officers are conscious that some of the proposals may have an adverse impact on certain socio-economic groups and businesses. The public consultation should be used to gauge the reaction in terms of the balance between costs and benefits across all sectors.

7.3 An Equalities Impact Assessment has been carried out and the following issues were identified:

- 7.3.1 The consultation methodology should include all citizens who live, work, pass through or use the town centre area.
- 7.3.2 Consider the full range of people, businesses and voluntary bodies affected by the measures.
- 7.3.3 Consider targeting specific groups as appropriate for example, some of the proposed measures may have unforeseen impacts on access groups will be included in the public consultation.
- 7.3.4 Ensure all groups are aware of the consultation and how to access it including those with sight and hearing disabilities.
- 7.3.5 Respond to requests for translations and/or documents in other languages on request.
- 7.3.6 Consider how to tailor consultation to the needs of groups who may not be able to respond via traditional or modern consultation methods; for example, there will be opportunities to respond via all methods including online, by post, in person and on request by a home visit.
- 7.3.7 Consult stakeholders in a way that suits them and take account of those who may need additional time for constitutional reasons such as charities and representative groups

8. LOCALISM

- 8.1 The declaration of the AQMA has no direct impact on any specific community.
- 8.2 Improving air quality is likely to be welcomed by the local community.
- 8.3 To achieve improvements, the proposed measures will affect users of the main town centre, transport, and administrative hubs.
- 8.4 It is intended to conduct a wide-reaching public consultation on the draft air quality action plan. Economic assessment in terms of the impact of the proposed measures in particular any form of charging or restrictions on road users will be a major consideration
- 8.5 The scope of consultation will include businesses, residents, workers, visitors and organisations operating within the designated area, who will be asked to comment on any benefits and/or disadvantages.

9. OTHER IMPLICATIONS

Area assessed:	Direct Implications:
Crime and Disorder	No significant implications arising from this report.
Sustainability (including Climate Change and Carbon Emissions)	Set out below in 9.1.
Corporate Parenting/Looked After Children	No significant implications arising from this report.

Safeguarding responsibilities for vulnerable children and adults	No significant implications arising from this report.
Public Health	Set out below in 9.2

9.1 Sustainability implications

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

9.2 Public Health implications

There are specific measures in the AQAP which are intended to improve air quality, to the benefit those living, working and visiting the vicinity of the AQMA. Air quality is a key public health priority identified in the Guildford Health and Wellbeing Board's Health and Wellbeing Strategy 2017-2022: <https://www.guildford.gov.uk/healthandwellbeing>

10. CONCLUSION AND RECOMMENDATIONS

- 10.1 The main focus of the report is identifying effective measures to improve air quality which can be implemented and take effect between 2022 and 2027, as from 2028 it is anticipated from the modelling that the Air Quality Management Area will become compliant with reference to the nitrogen dioxide limit values.
- 10.2 The draft Air Quality Action Plan focuses on several key priorities; to reduce polluting vehicle use where possible, lower emissions from transport, reduce congestion, provide planning guidance, and introduce measures associated with Clean Air Zones all aimed at the national objectives for nitrogen dioxide.
- 10.3 No one measure can achieve compliance; therefore, Guildford Borough Council must work in close partnership with Surrey County Council and other stakeholders to achieve the improvements.
- 10.4 The process must by statute include a consultation with several specified authorities, however as the likely impact of the major proposed measures are substantial a full public consultation is planned during July 2022.
- 10.5 The equality and diversity impact assessment has identified several areas which need closer examination.
- 10.6 Financial considerations are recognised as a substantial challenge, however that can be supplemented by obtaining Government funding via Defra.
- 10.7 Officers recommend that the Committee support the recommendations detailed earlier in section 4.3 of this report to approve the draft AQAP for consultation.

11. WHAT HAPPENS NEXT

- 11.1 The draft AQAP has undergone an initial internal consultation within officers of the steering group Guildford Borough Council, Surrey County Council and Waverley Borough Council.
- 11.2 The draft AQAP is presented to the Joint Committee 29 June 2022 for approval for consultation.
- 11.3 Subject to the recommendation being approved, a 4-week consultation on the draft air quality action plan will be conducted from Friday 1 July 2022 to Friday 29 July 2022. The GBC Communications Team will work alongside Environment and Regulatory Services officers to ensure that all relevant individuals and groups are included as part of a Communications Plan.
- 11.4 The interested parties include residents and businesses within the AQMA, transport operators, local councillors and amenity groups, who will have the opportunity to comment on the existing measures, proposals and put forward other options that could improve air quality within the Guildford Town Centre AQMA.
- 11.5 The formal statutory consultation will take place at the same time.
- 11.5.1 The Environment Act 1995 provides the statutory basis for consultation in respect of Local Air Quality Management (LAQM) Defra is the key statutory consultee. Schedule 11 of the Environment Act 1995 also requires local authorities to consult the following:
- a) The Environment Agency
 - b) National Highways
 - c) All local authorities neighbouring the local authority in question (Elmbridge, Mole Valley, Surrey Heath, Woking and Waverley)
 - d) The County Council
 - e) Bodies representing local business interests and other organisations as appropriate- for example Experience Guildford, The Freight Transport Association, The Guildford Access Group, and local amenity groups including The Guildford Society and Holy Trinity Amenity Group.
 - f) Health related authorities including the National Health Service (NHS) and the Public Health representatives at GBC and SCC.
- 11.6 The results of the consultation and final draft AQAP will be presented to the 29 October 2022 Guildford Joint Committee for approval.
- 11.7 The final version will be submitted to Defra for approval, implementation of the measures in the action plan will then commence from the date the AQAP is approved by Defra.

Contact Officer

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Consulted

Surrey County Council: William Bryans, Transport Studies.

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

Annexes

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

Appendix 2 –Draft Air Quality Action Plan May 2022 (Air Pollution Services)

Sources/background papers

1. Guildford Town Centre Air Quality Management Area, Guildford Joint Committee Report, 21st October 2021
<https://mycouncil.surreycc.gov.uk/documents/s81993/Guildford%20AQMA%20report.pdf>
2. Local Air Quality Management, Policy Guidance (PG16), Defra, April 2016
<https://laqm.defra.gov.uk/documents/LAQM-PG16-April-16-v1.pdf>
3. Local Air Quality Management, Technical Guidance (TG16), Defra, April 2016
<https://laqm.defra.gov.uk/technical-guidance/>
4. Air Quality (England) Regulations 2000
<http://www.legislation.gov.uk/uksi/2000/928/contents/made>
5. The Environment Act 1995
<https://www.legislation.gov.uk/ukpga/1995/25/contents>
6. The Air Quality (England) (Amendment) Regulations 2002
<http://www.legislation.gov.uk/uksi/2002/3043/contents/made>
7. UK Air Quality Strategy (DEFRA 2007)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf
8. Guildford Borough Council - Annual Status Reports and air quality monitoring results
<https://www.guildford.gov.uk/article/19807/Air-quality-monitoring>
9. Clean Air Zone Framework
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf