

**GUILDFORD BOROUGH COUNCIL AND
SURREY COUNTY COUNCIL**



**GUILDFORD
BOROUGH**

GUILDFORD JOINT COMMITTEE

DATE: 26 OCTOBER 2022

**LEAD OFFICER: GARY DURRANT, SENIOR SPECIALIST ENVIRONMENTAL
PROTECTION, ENVIRONMENT AND REGULATORY
SERVICES**

**SUBJECT: GUILDFORD TOWN CENTRE AIR QUALITY ACTION PLAN -
POST CONSULTATION**

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

SUMMARY OF ISSUE:

Following the declaration 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 was the subject of a statutory and public consultation from 1 July 2022 to 3 August 2022, the results of which are outlined in this report and accompanying appendices.

The report seeks approval to submit the revised AQAP for Guildford Town Centre to the Department of the Environment and Rural Affairs (Defra). The report proposes to introduce or explore the feasibility of eight primary and eleven complementary measures to reduce nitrogen dioxide concentrations in order to make the area compliant with the air quality standard. The measures will need to be combined to achieve the aims of the plan, which are to reduce nitrogen dioxide emissions and exposure to below the annual mean objective level.

Post consultation the measures have been divided into three categories:

1. Primary AQAP Measures include an HGV ban during certain times, a Clean Air Zone (CAZ), Electric Vehicle delivery hub, Traffic Management Planning, development planning guidance, incident management planning and hire schemes for cycles and scooters.
2. Complementary AQAP Measures consisting of supporting initiatives and projects of a smaller scale.
3. Action Plan Measures either not to be pursued or considered for other initiatives including the Council's Air Quality Strategy.

The report concludes that feasibility studies are required for the primary measures both in isolation and combination.

RECOMMENDATIONS:

The Joint Committee (Guildford) is asked to:

- (i) Note the results of the public consultation carried out from 1 July 2022 to 3 August 2022 and any amendments to the Air Quality Action Plan.
- (ii) Approve and adopt the Air Quality Action Plan for Guildford Town Centre as shown in Appendix 2. If approved the final report will be submitted to the Department for Environment Food and Rural Affairs (Defra) for final approval.

REASONS FOR RECOMMENDATIONS:

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

1. INTRODUCTION AND BACKGROUND:

- 1.1 The Guildford Town Centre Air Quality Management Area (AQMA) was approved on 21 October 2021 by the Guildford 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 blue area shown in Appendix 1.
- 1.2 The detailed air quality assessment, reported to the Joint Committee on 21 October 2021 concluded that the exceedance of the annual mean objective for nitrogen dioxide was attributable to emissions from road traffic. The source apportionment identified a breakdown of emissions with cars, buses/coaches, light and heavy goods vehicles, and motorcycles all contributing towards the elevated pollutant levels. The highest source at all modelled locations was from cars.
- 1.3 To meet our statutory duties following the declaration of the AQMA, the Council produced a draft Air Quality Action Plan (AQAP) which identified potential measures to improve air quality within the AQMA. The proposed timescale for the action plan measures is from 2022 to 2028 this represents the date by which the compliance would be achieved if nothing was carried out, based on modelled predictions of improvements in emissions from vehicles. Any measure delivered after this date would not contribute to meeting nitrogen dioxide standards in the town centre AQMA.
- 1.4 The Guildford Joint Committee 29 June 2022 approved a public consultation on a draft AQAP from 1 July 2022 to 3 August 2022 which can be seen in detail Appendix 2.
- 1.5 The consultation findings and proposed revisions to the AQAP and next steps are set out in the report.
- 1.6 On the 18 August 2022 Defra published revised Local Air Quality Management (LAQM) Statutory Policy Guidance with reference to AQMAs and AQAPs

which will be taken into consideration in the development and delivery of the AQAP:

- a. AQAPs must demonstrate how they will ensure that local Air Quality Objectives are met and maintained.
- b. AQAPs should set a date by when each measure will be carried out.
- c. The requirement for an AQMA to be declared within 12 months of identifying an exceedance of an air quality objective.
- d. Requirement for local authorities to produce an AQAP within 18 months of declaring an AQMA.
- e. The introduction of reminder and warning letters to increase local authority compliance with reporting.
- f. Guidance on how local authorities should work with Air Quality Partners.

2. ANALYSIS:

Draft Air Quality Action Plan

- 2.1 The draft AQAP identifies key priorities to consider when assessing measures that are likely to be effective.
 1. Most emissions arise from cars, with some contribution from LGVs and HGVs.
 2. There is no decipherable contribution from point sources or industry.
 3. There is also small contribution from buses.
 4. 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
- 2.2 The evidence suggests that multiple measures are going to be required to have the necessary impact in the timescale required. When developing the draft AQAP measures the following categories of measures were considered:
 - Alternatives to private vehicle use (bus-based park and ride)
 - Policy guidance and development control (air quality supplementary planning guidance for developers)
 - Promoting low emission transport (taxi licensing conditions, electric cycle scooter hire scheme)
 - 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)
 - Public information (improve website information, schools air quality programme, Air Alert, Parking App)

- Transport planning and infrastructure (road strategy schemes to tackle congestion, tools to assess traffic management)
- Traffic management (reduction of speed limits, HGV ban at certain times, traffic control centre monitoring, traffic incident management, anti-vehicle idling, bus stop clearways)
- Vehicle fleet efficiency (sustainable procurement guidance)

Consultation

2.3 The public consultation on the draft AQAP was conducted from 1 July 2022 to 3 August 2022. Multiple channels including social media, emails and individual letters were used to engage with the consultees.

2.4 The Schedule 11 of the Environment Act 1995¹² set out a list of Statutory Consultees. In line with the Schedule 11, following statutory consultees were consulted:

1. Surrey County Council – Highways, Public Health and Climate Change
2. National Highways
3. Mole Valley District Council, Surrey Heath Borough Council, Waverley Borough Council and Woking Borough Council
4. Ward Councillors and Surrey County Councillors
5. All parish Councils in GBC area
6. National Health Service
7. Business community via the Experience Guildford newsletter

2.5 In addition, we also consulted with the following:

1. 300 residential properties within the AQMA
2. Community groups including those based on locality, interests and sport; for example: Schools in Guildford, University of Surrey, relevant Resident Associations, Guildford Action, Disability Challengers, Active Surrey, Wisley Action Group
3. Transport providers
4. Statutory undertakers for water, gas and electricity
5. Access groups
6. Licensed taxi and private hire operators and drivers

2.6 Letters were sent to residents within the AQMA boundary and emails were used to contact all other categories of consultees listed. Guildford Borough Council also published details of the consultation on its website.

- 2.7 All consultees were directed to a web page containing a questionnaire set out in Appendix 3.
- 2.8 All consultees were requested to complete the online questionnaire, however some of the other organisations and statutory consultees sent in written responses.
- 2.9 Throughout the consultation period communications were sent via social media and a reminder was sent to all consultees (except residents) one week before the closing date.

Response

- 2.10 A total of 398 consultation responses were received from a base of social media campaigns and 630 individual contacts. The consultation survey questionnaire is attached as Appendix 3.
- 2.11 In summary, the aim of the survey was to:
1. Understand the general awareness on existing measures that have beneficial impact on air quality; to understand if these existing measures could play a more significant role in air quality improvement in Guildford Town centre AQMA.
 2. Obtain views on the primary proposed measures in terms of general acceptability, effectiveness and potential cost to individuals.
 3. Provide opportunity for the consultee to recommend any additional measures which in their opinion are relevant to the AQMA.
- 2.12 The Technical Officer Air Quality Steering Group which includes environmental health officers, planners (policy and transport), local highways officers (Surrey County Council), plus the Council's contracted air quality consultants Air Pollution Services discussed the consultation responses to agree the measures to be proposed in the final draft AQAP.
- 2.13 Summaries of the consultation responses can be seen in:
1. Appendix 4 Public comments summarised. The full version of the responses is available on request from Regulatory Services at Guildford Borough Council regulatoryservices@guildford.gov.uk
 2. Appendix 5 Surrey County Council Highways
 3. Appendix 6 Written responses from public bodies (National Highways, Shalford Community Council are highlighted).
- 2.14 The measures were all rated in terms of potential for nitrogen dioxide reductions as shown in Options Matrix Table 4.5 of the Guildford Town centre Air Quality Action Plan, dated August 2022, reference: L1002_A_10, prepared by Air Pollution Services (enclosed as Appendix 2), with an overall score based on preliminary observations.
- 2.15 Considering the consultation and discussion amongst the Technical Officer Steering group, the AQAP measures were divided into three categories:

1. Primary
 2. Complementary
 3. Action Plan Measures not to be pursued or inserted into alternate strategies.
- 2.16 Summarised below are the main comments relating to the measures, a summary of references from consultees and the overall score from the Options Matrix Table 4.5 Page 31 Appendix 2.
- 2.17 All measures were scored out of 45 and have been listed in terms of prominence.

Primary Measures

Measure 3: Incident management and planning to reduce congestion (Primary measure) Score 33

- 2.18 This measure was not included in the survey questionnaire for consultation. However, the measure is supported by SCC Highways thus included in primary measures and has the potential to improve air quality.

Measure 6 HGV ban around the gyratory during peak and interpeak hours (Primary measure) Score 31

- 2.19 Whilst the HGV ban was seen as a popular choice by 72% respondents who either strongly agreed or agreed, there was some level of disagreement for economic and displacement reasons. For example one business that delivers skips noted that would not be feasible for operational reasons.

Measure 19 Electric vehicle deliveries and local delivery hubs (Primary measure) Score 27

- 2.20 There was 80% support for the delivery hubs, Onslow Park and Ride was cited as a potential site especially if it is no longer used. Other potential sites are on Council owned land within industrial estates.
- 2.21 At this time potential funding for this measure has not been assessed, however it is anticipated that it may attract commercial interest especially if any restrictions on HGV are implemented.
- 2.22 National Highways currently investigating potential electric vehicle charging hubs within the area of the A3 trunk road.

Measure 20 A Clean Air Zone (CAZ) or Low Emission Zone (LEZ) implementation categories not defined (Primary measure) Score 27

- 2.23 The potential CAZ raised 383 responses with 64% either agreeing or strongly agreeing, which demonstrates the potential level of support. SCC requested information and consideration of whether other traffic restraint measures have been considered which are set out in full in Appendix 3B.

- 2.24 The main concerns were the cost of converting either by purchase or lease to a low emission vehicle, diverted traffic affecting other areas, enforcement and the impact on the town's economy.
- 2.25 If the AQAP is approved, the next phase is to carry out a feasibility study to find an effective package which should include:
1. Both charging schemes and non-charging measures.
 2. Finding a practical scheme boundary and any diversionary routes.
 3. Traffic impacts, air quality modelling and cost benefit analysis.
- 2.26 The Council has the budget allocated to fund a feasibility study.

Measure 23 Development of air quality supplementary planning guidance (Primary measure) Score 26

- 2.27 The potential impact of development was included in many responses, who outlined projects including St Mary's Wharf, Guildford Park, Stag Hill, North Street, Guildford Plaza and others outside of the town centre.
- 2.28 The presence of the AQMA has already been included in the planning process for the outlined projects and will be standard as part of the consultation and pre application discussions with developers.
- 2.29 The Development Management Policies are being heard through the Local Plan Process. Supplementary guidance will be produced once these have been examined and the decision has been made.

Measure 31 Provide additional EV charging points off street (Primary measure) Score 30

- 2.30 Providing additional off street charging points is a new measure introduced in response to feedback by consultees and action by other agencies and is key in building confidence in residents, businesses and visitors converting to electric vehicles.
- 2.31 Consultees mentioned the lack of charging facilities, on street facilities being blocked by prolonged stays or non-EV vehicles, facilities on private land not being accessible and hardly any provision at existing fuel stations.
- 2.32 The infrastructure on street is managed by GBC and SCC but will revert to the latter post March 2023. Existing community facilities, educational establishments, blocks of flats in and around the AQMA are potential areas to explore as charging points are only normally required as part of new planning permissions.
- 2.33 The commercial sector could also contribute in terms of providing charging facilities particularly at locations where food and parcel deliveries originate.

Measures 32 and 33 Electric cycle and scooter hire Replaces Measure 27 electric/cycle scooter (Primary measures) Score 31

- 2.34 Both hire of electric cycles and scooters are being trialled across several towns and cities in response to air quality problems similar to those in Guildford.
- 2.35 A small percentage of responses (<1%) mentioned the use of electric cycles and scooters. They identified the need for publicising and introducing the ebike and scooter hire schemes. This action is set out as two separate measures in the AQAP as they are distinct initiatives. Cycles are for longer journeys, whilst scooters can be used for internal trips in the town centre including the AQMA.
- 2.36 Next steps are for SCC and GBC to evaluate the feasibility of this option.

Measure 34 Electric cargo bike hire scheme (Primary measures) Score 29

- 2.37 The use of electric cargo bikes can reduce journeys carried out by small vans and cars. To fully implement them to their most effective levels there needs to be a suitable network of accessible/priority routes.
- 2.38 Next steps are for SCC and GBC to evaluate the feasibility.

Complementary measures

Measure 4: Reduction of speed limits 20mph zones (Complementary measure) Score 33

- 2.39 A total of 391 responses were received of which 53% agreed or strongly agreed with the proposed measure and 31% disagreed/strongly disagreed.
- 2.40 The 20mph zones are advocated in the 'Liveable Neighbourhood Schemes' in the current Surrey CC Local Transport Policy (LTP4)¹³.
- 2.41 The Surrey CC Highway's full response is included in Appendix 3B.
- 2.42 Despite the high support for this measure the low nitrogen dioxide reduction score of 2 classified this as a complementary measure supporting air quality improvement. This measure will be further explored with SCC when resources allow.

Measure 7 Improve Guildford Borough Council website and education resources for schools (Complementary measure) Score 30

- 2.43 The impact of school journeys was frequently mentioned in the consultation response, and this initiative is linked to Measure 8. Out of 391 responses, 22 mentioned car as routine mode of travel for school runs. A few responses mentioned engine idling during the school pickup times.
- 2.44 Surrey County Council Travel Planning have introduced sustainable travel initiatives for schools. The Borough Officers will continue to work with them to explore means to encourage and recruit schools on to these programmes.

Measure 8 Schools air quality programme - monitoring, student air quality committee, educational materials, presentations (Complementary measure) Score 30

- 2.45 SCC as the education authority proposed this measure which GBC can support to deliver.
- 2.46 Respondents showed by the level of response that air quality is a subject that they have an interest in and both authorities, plus partners need to work with the educational establishments on not only learning, but also culture and operational issues such as Travel Plans.

Measure 15 and 16 Produce tools to assess traffic management schemes prior to implementation and evaluate measures to reduce traffic emissions (Complementary measures) Score 28

- 2.47 There are valuable tools that both GBC and SCC should use to assess and evaluate prior to changes and/or for improvements. One example was the Walnut Tree Close one-way system about which we received some negative comments in the consultation responses.
- 2.48 Ensure that tools are used on all traffic schemes which will need cooperation between National Highways, SCC and GBC.

Measure 17 Parking App to direct users to closest and cheapest spaces (Complementary measures) Score 27

- 2.49 The Official Guildford App by Experience Guildford currently provides real time parking information using latest technology delivered by Ethos in conjunction with Guildford Borough Council.
- 2.50 There is an opportunity for the Council to publicise the App further and explore the opportunity with Experience Guildford to add air quality information for the general public (including details of the AQMA and AQAP) and add further features to prompt and encourage drivers to use the nearest and most accessible car parks.

Measure 21 Anti vehicle idling scheme (Complementary measure) Score 26

- 2.51 77% of the total responses were in support for anti-idling initiatives throughout the town centre and beyond and many respondents expressed a desire for more enforcement.
- 2.52 Vehicle idling is an offence against the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002. The law states that it is an offence to idle your engine unnecessarily when stationary. If you fail to turn your engine off after being spoken to you may be issued with a fixed penalty notice of £20.
- 2.53 The legislation covers all vehicles on public roads including buses, taxis and private cars. However, it does not apply to vehicles moving slowly due to road works or congestion; vehicles stopped at traffic lights; vehicles under test or repair; or defrosting a windscreen and all these factors would need to be considered before taking formal action.

- 2.54 The Head of Operational Services at GBC has confirmed that; enforcement against anti idling is currently being carried out by Civic Enforcement Officers on streets and outside of schools.
- 2.55 Whilst a reduction in idling across the AQMA area would contribute to the reducing air pollution, the impact would not be significant therefore despite popularity it will be classed as a complementary measure and not be prioritised.

Measure 18 Facilitate and promote home, mobile and flexible working within the Council (Complementary measures) Score 27

- 2.56 Flexible working had already commenced before the Covid-19 pandemic for those officers where working at home was appropriate and further increased as part of the control measures during the pandemic.
- 2.57 Explore expanding home and flexible working by including homeworking and flexible working where possible when employing contractors.

Measure 22 Bus stop clearways (Complementary measure) Score 25

- 2.58 There was no specific response on this topic. It may have benefits where buses stopped at the bus stops impede traffic flow potentially on Portsmouth Road and Millbrook.
- 2.59 Whilst not assessed as a priority, as several factors need to be examined, such as frequency of buses on the route, queuing during the bus stopping, and constraints such as sufficient road space.

Measure 26 Taxi licensing conditions eg vehicle emission standards (Complementary measure) Score 25

- 2.60 Consultation with the taxi and private hire licensees was carried out via the Council's regular newsletter. The commitment to reduce the taxi fleet emissions has been initiated by a change in the Council's Taxi and Private Hire Policy. There was support for reduced emission standards amongst the taxi and private hire trade but some concerns were raised about the provision of sufficient electric vehicle charging points. Incentivising the conversion to an electric/low emission fleet was also suggested as a way to speed up the process.
- 2.61 There is currently Defra grant funding across several Surrey authorities including Guildford to subsidise low emission taxis, this is subject to final details but has already generated interest from the operators.
- 2.62 The taxi licences are subject to conditions which limit emissions.
- 2.63 To impact on emissions, it is important to set standards that are common to all within the taxi fleet, to ensure consistency and a level playing field for proprietors, operators, and drivers. The age of vehicles and the exhaust emission specification are critical to the level of pollutants emitted. Consequently, to improve air quality and reduce emissions from the licensed fleet, standards relating to the exhaust emissions will be introduced in addition to the requirements regarding the age of vehicles.

- 2.64 Licensing from 1st April 2021 requires all renewal applications from 1 January 2025, must meet or exceed Euro 6 emission standards (Euro 6 compliant being registered on or after 6 Feb 2014). As the taxi fleet change their vehicles over the coming years emissions will reduce.

Measure 28 Sustainable Procurement Guidance (Complementary measure) Score 28

- 2.65 Both GBC and SCC could improve the sustainability criteria when procuring good and services whilst still meeting procurement standards by producing guidance for officers procuring goods and services.
- 2.66 Officers to explore the production of guidance.

Measure 30 Improved facilities for walking and cycling (Complementary measure) Score 27

- 2.67 Approximately 35% of responses expressed concern that safe infrastructure for walking and cycling away from main roads was not sufficient to encourage a change of habit. They cited examples such as lack of cycling lanes in the town centre and the lack of route connectivity.
- 2.68 SCC and the Borough Council both have schemes planned that will improve cycling and walking routes in and around the town centre which will encourage people out of their cars to other forms of transport.
- 2.69 SCC have adopted a scheme of Liveable Neighbourhood which identifies delivery of cycling infrastructure where there is demand. Liveable Neighbourhood schemes are very relevant to the AQAP and a potential action that could be delivered in partnership with the county council.

Measure 35 Improved awareness of existing schemes (Complementary measures) Score 37

- 2.70 The consultation showed that there was low awareness of existing schemes which contribute to improving air quality. Steps to improve awareness and uptake of existing schemes would help improve air quality across the AQMA and the borough.

Measures not to be put forward or pursued as part of other strategies

Measure 1: New bus-based park and ride (Not to be pursued) Score 38

- 2.71 Whilst Park and Ride facilities received positive support from many and the electric buses serving them were seen as a good asset, Onslow and Spectrum Park and Rides have both been suspended since the Covid 19 pandemic. Consultation feedback also stated that the frequency of buses was inconsistent and unreliable, plus the pricing system discriminating against high passenger carloads were noted.
- 2.72 SCC also stated that existing park and rides should be promoted as alternatives to town centre parking, plus the suitability of sites should be reviewed as they are deemed with reference to Spectrum and Artington being too near to the town centre.

2.73 Introduction of any further Park and Rides have been discounted as a measure in the AQAP as the current demand is low and any scheme would take longer to fully implement than the duration of the AQAP.

Measures 2 and 5: Road Strategy Schemes (Not to be pursued) Scores 33 and 31

2.74 Delivery of any major road strategy scheme would only be realised after this plan has to be delivered so has been excluded.

Measure 29 Incentivise retrofitting scheme for buses to allow low emission fuels (Not to be pursued) Score 24

2.75 This option is not to be pursued as funding for these schemes is not available to local authorities and the implementation time is unlikely to be in the timeframe for delivery of this plan.

Measure 36 Low traffic neighbourhoods (LTN) (Additional proposed measure not to be pursued) Score 19

2.76 There was a proposal to create an LTN in the area between the Farnham and Portsmouth Roads was supported by SCC.

2.77 This potential scheme would benefit those living in and around the residential Wodeland Avenue/ The Mount area during peak times, but not the AQMA area directly. As these roads are currently used as a cut through to avoid town centre congestion, hence there are some local benefits to restrictions at peak times.

2.78 This is listed as a measure to be rejected due to the low score associated with the reduction of nitrogen dioxide levels in the AQMA; however SCC may wish to consider the impact of implementing this action if it is pursued further in terms of potential for more traffic diverting to the AQMA.

Measures not to be pursued due

2.79 All measures in the AQAP must meaningfully contribute to a reduction in air quality levels and after evaluation the following measures have been discounted as they would not lead to any or significant improvement in air quality.

2.80 Many of these measures help improve knowledge about air quality and may be considered for inclusion in a revised Guildford Air Quality Strategy.

- Measure 10 Promotion of low pollution route maps to public (Not to be pursued) Score 28
- Measure 11 Postcode air quality checker (Not to be pursued) Score 28
- Measure 12 Air Alert System (Not to be pursued) Score 28
- Measure 13 Provide air quality information on current conditions in Guildford and what residents can do to help (Not to be pursued) Score 28

- Measure 14 Provide indoor air quality information to residents how they can improve their conditions (Not to be pursued) Score 28
- Measure 24 Improving modelling predictions of nitrogen dioxide concentrations (Not to be pursued) Score 25
- Measure 25 Promotion of Travel Choices (Not to be pursued) Score 25
- Measure 9 Promotion of cycling travel route maps to public (Not to be pursued) Score 28

3. OPTIONS:

- 3.1 As Guildford Borough Council are under a statutory duty to adopt an Air Quality Action Plan for the AQMA in Guildford town centre, inaction is not an option.
- 3.2 There are two options available after considering the information in this report.
- A. Approve and adopt the revised Air Quality Action Plan for Guildford Town Centre as shown in Appendix 1. To be submitted to Defra by 30 October 2022.
 - B. Adopt a modified version of the Air Quality Action Plan for Guildford Town Centre. To be submitted to Defra by 30 October 2022.
- 3.3 Officers recommend Option A as analysis of the evidence suggests taking forward this action plan and implementing a selection of these measures in an appropriate timeframe will reduce nitrogen dioxide to level where there is no longer an exceedance of the air quality objective expressed as an annual mean.
- 3.4 If nitrogen dioxide levels are reduced to the levels predicted so the air pollution is brought within statutory levels, then the AQMA could be revoked.

4. CONSULTATIONS:

- 4.1 Consultation on the revised AQAP after the public consultation has taken place with senior officers and the lead member for air quality and climate change; Councillor Cait Taylor Guildford Borough Council, who supports the adoption of the AQAP, the county members for Guildford and the Cabinet Member for Highways Councillor Matt Furniss have also been sent the draft report. (NB to be sent following Exec Liaison to Cllr Furniss)
- 4.2 We have briefed the Borough ward members for the relevant wards.

5. FINANCIAL AND VALUE FOR MONEY IMPLICATIONS:

- 5.1 Guildford Borough Council's has produced the AQAP from existing budget and officer resource within Environment and Regulatory Services.
- 5.2 It must be noted that officers from other services within the Steering Group have contributed significantly in terms of time and expertise.

- 5.3 To help progress statutory air quality duties across the Council including the AQAP an officer has been seconded temporarily on a part time basis until the 1 April 2023 with their substantive post being backfilled with additional funding that has been secured.
- 5.4 A proportion of the additional funding has also been budgeted for the feasibility study on the primary measures (£50,000 approximately) and associated data collection (£20,000 approximately for an Automatic Number Plate Recognition survey)
- 5.5 External grant funding opportunities for the chosen primary measures will need to be secured as it is unlikely that either Council will be able to fully fund the measures within existing resources. Securing the necessary funding to the deliver the primary measures will be a key factor in the feasibility studies.
- 5.6 Resources available for implementing the AQAP should be dedicated to delivering the primary measures which will contribute the most to improving air quality below the legal limits.

Legal implications

- 5.7 The provisions of Part IV of the Environment Act 1995 established a national framework for air quality management, which requires all local authorities to conduct periodic local air quality reviews.
- 5.8 Under Section 84 of the Environment Act 1995 the Council is required to produce an AQAP following the designation of the AQMA.
- 5.9 The Council must produce and consult on an AQAP, which details the proposed actions to ensure that air quality in the area improves.
- 5.10 Defra guidance up until August 2022 had stated that the AQAP should be produced within 12 months of the designation. The timescale has now been amended to 18 months allowing Local Authorities more time to produce a suitable plan.
- 5.11 The Defra LAQM (Local Air Quality Management) Statutory Policy Guidance LAQM. PG22 for England which was updated in August 2022 reflects the strengthened LAQM framework provided by Schedule 11 of the Environment Act 2021.
- 5.12 The Environment Act 2021 requires AQAPs to demonstrate how they will ensure that Local Air Quality Objectives are met and maintained meaning AQAP must be deliver air quality improvements.
- 5.13 The AQAP should set out the date when each measure or combination of measures will be carried out. AQAPs which do not fulfil these criteria will need to be revised.

6. EQUALITIES AND DIVERSITY IMPLICATIONS:

- 6.1 An Equalities Impact Assessment (EIA) has been carried out and the following issues were identified:

- The consultation methodology included all citizens who live, work, pass through or use the town centre area.
 - Officers considered the full range of people, businesses and voluntary bodies affected by the measures.
 - Ensures all stakeholders are aware of the consultation and how to access it including those with sight and hearing disabilities.
 - Responded and provided requests for translations and/or documents in other languages on request.
 - Consult stakeholders in a considerate manner and take account of those who may need additional time for constitutional reasons such as charities and representative groups.
- 6.2 It is anticipated that the proposed measures to improve air quality may benefit those individuals who suffer with pre-existing medical conditions that are sensitive to poor air quality.
- 6.3 The AQAP when implemented takes positive steps to improve health inequalities air quality in the AQMA.
- 6.4 The proposals will need to consider any potential impact on different socio-economic groups and businesses. For example if implementing measures has an impact on business operations or may prevent or impact access to services and infrastructure.
- 6.5 Further EIAs will be required when conducting feasibility on the primary measures.

7. LOCALISM:

- 7.1 The declaration of the AQMA and implementation of the AQAP has no disproportionate impact on any specific community. However, the public consultation which consisted mainly of residents has raised:
- a. The lack of cycling facilities in and around the AQMA.
 - b. Public transport affordability and frequency.
 - c. The impact of some potential measures in terms of costs in particular the purchase of low emission vehicles.
 - d. Economic impact on the town centre businesses.

8. 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.
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.

8.1 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.

8.2 Public Health implications

The proposed measures in the AQAP are intended to improve air quality and in turn have health benefit those living, working and visiting the vicinity of the AQMA particularly those with pre-existing health conditions connected to poor air quality. Air quality is a key public health priority identified in the Surrey Health and Wellbeing Strategy.

9. CONCLUSION AND RECOMMENDATIONS:

- 9.1 Following the designation of the AQMA in Guildford town centre, public consultation on a draft AQAP to improve air quality and meet the air quality objectives in the area was conducted.
- 9.2 The response from approximately 400 individuals or organisations demonstrated a significant the interest in not only air quality, but also local transport infrastructure challenges. All statutory consultees have been recontacted and they have been made aware of the revised plans shown in the draft AQAP.
- 9.3 Officers will ensure that the details of this report are widely circulated using the same media as the public consultation so that consultees receive feedback. All residents contacted as part of the consultation exercise will be sent letters with details of this report and the committee details.
- 9.4 Following consultation, the draft was revised, both removing and adding a number of measures. In addition, the remaining measures have been classified as Primary and Complementary, the former will be the main focus of future actions as described in this report.
- 9.5 Officers recommend Option A, as this plan proposes exploring the feasibility of a suite of measures that if implemented will reduce nitrogen dioxide levels so there is no longer an exceedance of the annual mean objective level.

10. WHAT HAPPENS NEXT:

- 10.1 If the action plan is adopted, officers from Guildford Borough Council and Surrey County Council will commence implementing the AQAP. The focus will be on exploring the feasibility of the primary measures and identifying the

combination of measures required to achieve compliance with air quality objectives.

- 10.2 After the feasibility studies have been completed the AQAP will be revised to reflect the primary measures that will be taken forward. Funding for the primary measures will be sought.
- 10.3 Once implemented the impact of the measures in reducing nitrogen dioxide levels will be monitored using diffusion tubes. The levels will be reported annually as part of the Council's Annual Status Report to Defra.
- 10.4 A report will be submitted annually to the Joint Committee or its equivalent in order that Members can monitor any progress.
- 10.5 When there is no longer an exceedance of the annual mean air quality objective level for nitrogen dioxide, the Council can submit evidence to Defra for the AQMA to be revoked.

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Consulted:

Surrey County Council: William Bryans, Transport Studies.

Guildford Borough Council: Director of Service Delivery, Corporate Management Board, 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 (revised) Air Quality Action Plan August 2022 (Air Pollution Services and Guildford Borough Council)

Appendix 3 – Public consultation survey questions.

Appendix 4 – General public consultation summary

Appendix 5 Surrey County Council highways response.

Appendix 6 Public consultation written responses and comments from organisations/authorities

Sources/background papers:

1. Guildford Town Centre Air Quality Management Area-Action Plan, Guildford Joint Committee Report 29th June 2022
<https://mycouncil.surreycc.gov.uk/documents/s86626/Guildford%20Town%20Centre%20air%20quality%20action%20plan.pdf>

2. 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>
3. Local Air Quality Management, Policy Guidance (PG16), Defra, April 2016
<https://laqm.defra.gov.uk/documents/LAQM-PG16-April-16-v1.pdf>
4. Local Air Quality Management, Technical Guidance (TG16), Defra, April 2016
<https://laqm.defra.gov.uk/technical-guidance/>
5. Air Quality (England) Regulations 2000
<http://www.legislation.gov.uk/uksi/2000/928/contents/made>
6. The Environment Act 1995
<https://www.legislation.gov.uk/ukpga/1995/25/contents>
7. The Air Quality (England) (Amendment) Regulations 2002
<http://www.legislation.gov.uk/uksi/2002/3043/contents/made>
8. 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
9. Guildford Borough Council - Annual Status Reports and air quality monitoring results
<https://www.guildford.gov.uk/article/19807/Air-quality-monitoring>
10. Clean Air Zone Framework
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf
11. Revised LAQM Statutory Policy Guidance LAQM.PG22
<https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-Policy-Guidance-2022.pdf>
12. Schedule 11 of the Environment Act 1995, Air Quality – Supplemental Provisions: <https://www.legislation.gov.uk/ukpga/1995/25/schedule/11>
13. Surrey County Council's Local Transport Plan, LTP4
<https://www.surreycc.gov.uk/roads-and-transport/policies-plans-consultations/transport-plan>