

APPENDIX 5 SCC response to Guildford Borough Council –public consultation regarding the draft Air Quality Action for Guildford Town Centre Air Quality Management Area (July/August 2022)

Comment ref.	SCC Comment	GBC Comment reference to main report or AQAP
General comments given first, then listed by page number		
1	Travel planning at schools is not included, and whilst SCC has delivered a number of air quality programmes with districts and boroughs, these are intensive and take a lot of time. We would welcome GBC promoting Modeshift STARS and looking at encouraging more schools to have travel plans. We can clearly demonstrate reduction in vehicles and the shift to alternatives through this scheme.	Noted 01-09-2022 in 2.38 JC report
2	Cycling is mentioned to some degree but the only scheme mentioned is the Guildford to Godalming Greenway. This is a good scheme to implement, but there is still a considerable way to go to having a comprehensive cycle network across Guildford. Implementation of a high quality network at the same time as implementing measures to restrain traffic could yield significant benefits in the medium to long term.	Noted 26-08-2022 Measure no 30 Noted in 2.9 JC report
3	Whilst bus based park and ride is included, there is no mention of any other improvements to public transport.	Noted but no details provided 26-08-2022 Action 2.16 in JC report
4	In addition to the measures included / considered so far, to what degree have other traffic restraint measures been considered, for example: removal of parking in the town centre or increasing car parking charges for non-ULEZ compatible vehicles; closure/modal filtering on residential through routes to concentrate through traffic onto main roads; for example reducing capacity on main roads; a congestion charge; increasing residents' parking permit charges for non-ULEZ compatible vehicles. There may be quite a few potential measures that could have a significant benefit, that are not currently included – can they be reconsidered in light of the direction of the newly adopted LTP4?	Noted and requires more input from SCC as part of the Feasibility Study. Reference Measure 20CAZ.
5	There is no mention of doing more to deter car use in the town centre in the form of reducing car parking capacity, and increasing car parking charges. Park and Ride should be promoted as the alternative to taking private cars into the town centre, and reducing the amount of car parking and increasing the charges would help with this.	Noted as part of any potential CAZ feasibility studies. Note 2.17 JC report

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6	Surrey County Council should aspire for all town centres, busy shopping streets and minor roads in residential areas to have a 20 mph speed limit. Successfully restricting vehicles to 20 mph will also reduce emissions because it will reduce the emissions resulting from harder accelerating and braking between traffic queues, junctions and crossings. However we know that introducing 20 mph speed limits using signs alone will not be successful enough if the existing mean average speeds are much closer to 30 mph, in which case engineering changes (traffic calming or narrowing the road), will be necessary. Many of the roads in question are likely to have speeds 24 mph or below already (in which case a lower 20 mph limit would be viable without the need for additional measures). The first step would be to commission surveys to determine the existing speeds and which roads would require additional supporting measures or not.	Noted 24-08-2022 See action measure 4.
7	There could be greater emphasis on the potential for Local Traffic Neighbourhoods (creating using point closures) to deter car use. Evidence of such measures in Waltham Forest has shown that it has resulted in less traffic overall, even on boundary roads. In addition, there could be opportunities to introduce school streets (timed pedestrian zones) in the vicinity of schools that would deter car use for the school journey.	Noted 24-08-2022 Proposed as Measure 36.
8	An air quality programme for schools would require staff resources to develop the programme, recruit schools and to supervise the delivery. Such a programme would help in raising the importance and understanding of the issue of air quality. However, a more effective use of resources would be to encourage more schools to develop travel plans containing actions that the school will undertake to reduce car use for the school journey. These have been shown to encourage modal shift to more sustainable modes of transport which will reduce emissions near schools more effectively.	Noted 24-08-2022 Measures 7 and 8
	Comments by page number	

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9	<p>Page 11 - It might be worth making reference to the county council’s Climate Change Strategy and Climate Change Delivery Plan in this section as they are both very relevant local policy documents that touch upon air quality.</p> <p>The strategy is available here: https://www.surreycc.gov.uk/community/climate-change/what-are-we-doing/climate-change-strategy</p> <p>The delivery plan is available here: https://www.surreycc.gov.uk/community/climate-change/what-are-we-doing/greener-futures-climate-change-delivery-plan-2021-to-2025</p>	Noted altered in 3.2.3 Draft AQAP 01-09-2022
10	Page 12 - The document refers to LTP3, rather than the newly adopted LTP4 document. The summary description should reflect the significant shift in focus to prioritising active and sustainable modes within decision making.	Noted altered in 3.2.5 Draft AQAP 24-08-2022
11	Page 23 - Reference is made to the EV pilot study being at construction stage. As of May this year, 19 chargepoints were fitted in Guildford as part of the on-street pilot. Jonathan James (SCC) may be able to provide the latest position.	Noted altered in 4.3 Draft AQAP 24-08-2022
12	Page 22-23 – the Guildford-Godalming Greenway would be a beneficial scheme and working in partnership with GBC/SCC is key to delivery. The route does not yet fully “exist” as there are unavoidable steps on the existing route, which mean the route is not fully accessible exist for people using wheelchairs as suggested.	Noted altered in 4.3 Draft AQAP 24-08-2022
13	Page 23 – the Walnut Tree Close experimental one-way scheme has been deployed.	Noted altered in 4.3 Draft AQAP 24-08-2022
14	Page 24 - Table 4.2 – Transport Planning & Infrastructure. The table cites a single scheme proposal (Guildford Godalming Greenway) and suggests it might not lead to much modal shift of commuter trips. However, many other schemes that will be included in our programme of walking/cycling improvements in the town would have the potential to contribute to a greater, more significant modal shift. Is there a way of reflecting this more holistically, perhaps by reducing focus on the GGG scheme only – for example, the Guildford to Burpham cycle scheme which is planned for later this year and should have the propensity to capture a significant number of utility trips.	Noted 01-09-2022

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15	Page 24 – penultimate row of table – it is not true to suggest there is already a usable cycle route into Guildford from Godalming, as cyclists currently need to navigate carrying bikes up and down step or must choose to cycle along main roads.	Noted 01-09-2022 The usable question has been highlighted in 4.4 of the AQAP.
16	Page 25 – bus-based park and ride - arguably the site at the Spectrum is too close to the town centre to be fully effective in contributing to improved air quality in the town centre. To what degree has it been considered to introduce sites on more of the radial routes into the town centre – eg A320 (possibly at Slyfield?), A322 / A323 (vicinity of Rokers / Merrist Wood / Holly Lane / Fairlands), A3 / A3100 Burpham / Gosden Hill, A281 Shalford. High quality bus priority measures required to make these worthwhile.	Noted 01-09-2022 See 2.20 JC Report.
17	Page 25 – Measure 2 congestion on Strategic Road Network –SCC would welcome further consideration of improvements on and around the A3 to alleviate congestion and air quality issues.	Noted 01-09-2022 This needs to be referred to National Highways.
18	Page 25 – incident management –presumed little cost benefit here –if there is an incident on the A3, Guildford becomes gridlocked very quickly.	Noted 01-09-2022 This needs to be referred to National Highways.
19	Page 25-25 – 20mph zones – unless drivers obey a 20mph speed limit the impact of these schemes may be limited. However, low traffic neighbourhoods are included, which could have significant benefit in removing through journeys for motor vehicles, thus improving these areas for residents, pedestrians and cyclists.	Noted 01-09-2022 Both measures are included as 4 and 36 respectively. Low Traffic Neighbourhoods are however unlikely to improve the AQMA.
20	Page 26 – traffic control centre monitoring / real time traffic control (measure 5) – arguably, this should not be predicated on anything related to the A3 as suggested here. Real time traffic control could be beneficial with the A3 as it currently stands – but there would be a capital cost to establish (monitoring, system upgrades, information panels, etc) and a revenue cost to operate (maintenance of the equipment plus maintenance of the intelligence, plus potential cost of human operators if desired outcomes couldn't be achieved automatically).	Noted 01-09-2022 This needs to be referred to National Highways.
21	Page 26 – HGV ban (measure 6) – any possible HGV ban should be subject to appropriate testing, feasibility and benefits realised, and the consideration that it would be aimed at a minority contributor of pollutants, and may not therefore have a significant impact on its own. A number of issues should be considered including potential impact of any re-routing, and impacts on servicing local business.	Noted 01-09-2022 Will be subject to a feasibility study.

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22	Page 26, Table 4.3 – Promotion of cycling travel route maps to public (Measure 9). SCC currently only provides an online map showing the location of cycle facilities in the county which doesn't offer the most user friendly or accessible service. We no longer publish paper maps. We're currently considering how we can best improve provision in this area. This should be considered a complementary measure to implementing a comprehensive network of cycle routes	Noted 01-09-2022 Set out as a complementary measure 9.
23	Page 26 – low pollution route maps for walking (measure 10) – a difficult measure to 'sell' versus a general tendency to prefer the most direct route.	Noted 01-09-2022 Set out as complementary measure 10
24	Page 27 – Potential CAZ / LEZ (measure 20) – difficult to target bus / HGV operators in isolation unless financial support provided to upgrade – there may be a risk that a competitive advantage is given to car drivers over buses, particularly in the context of LTP4. This should be considered carefully against other options such as an all-encompassing ULEZ as considered above.	Noted 01-09-2022 As set out in Measure 20
25	Page 28, Table 4.3 – Promoting Travel Choices (Measure 25). SCC plan to launch a media and information campaign in September 2022 to promote active travel over private car use for short journeys which will include the Guildford area.	Noted 01-09-2022 and put in JC report reference 2.78.
26	Page 38 Table B1 – to what degree can/should the AQAP include short, medium and long term interventions? Are there shorter term suggestions that would be beneficial to include in its assessment?	Noted 01-09-2022; the measures have been divided into Primary and complementary measures and will be further categorised as suggested
Notes re Surrey Transport Plan		

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	<p>From the perspective of LTP4, please note the following, and see attached track changes for suggestions:</p> <p>Track changes noted try to cover anything that relates to or contravenes the policies within the LTP4. There were a few things that contradicted / did not align with the LTP4 that GBC had acknowledged were SCC’s responsibility and therefore wouldn’t be possible to implement. These are highlighted.</p> <p>A comment on a statement about the Guildford to Godalming Greenway is also included in addition to those given within this document above, and further reference added to the upcoming Local Cycling and Walking Implementation Plan (LCWIP) which should be included.</p>	<p>Altered 24-08-2022</p>