

Consultation responses

1. Statutory consultees and elected authorities

Organisation	Response summarised	Comments
SCC- Highways	See Appendix 5	See Appendix 3B
SCC- Public Health	<ul style="list-style-type: none"> First paragraph - <i>Based on 2020 mid-year population estimates for the UK and Guildford, there is estimated to be the equivalent of 63-81 deaths in the borough.</i> I think it would be helpful to explain/reference where these figures have come from. I'm presuming you have taken the fraction of mortality attributable to particulate air pollution % for Guildford and used this % to calculate the number of deaths based on the total number for Guildford. This is fine, but some context would be helpful – i.e. to say how the figures were reached, and that they are an estimate of the number of deaths where air pollution is likely to be a contributing factor rather than a direct cause. I'm just looking for a bit of context so that the headlines don't become 63-81 people in Guildford have died as a direct result of air pollution. Second paragraph - <i>Air Pollution is a significant public health issue. In Guildford, the key pollutants are specifically nitrogen dioxide (NO₂) and fine particulates, these are principally from traffic emissions. Public Health England (now UK Health Security Agency) estimate that 5.7% of deaths in those over 25 years old are from long term exposure to anthropogenic particulate pollution.</i> Just suggest you include the highlighted wording above. 	<p>This comment has not been adequately referenced and has been deleted. 1/09/2022</p> <p>Noted and amended 1/09/22</p>
Woking Borough Council	Would like to be kept informed on any developments or proposals.	Noted 03/08/2022 To be briefed prior to JC Meeting on revisions.
National Highways	National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network	Noted 01/09/2022 To be briefed prior to JC Meeting on revisions.

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	<p>(SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3 and M25 Motorway.</p> <p>We have reviewed this consultation and note the aim of the draft Air Quality Action Plan is to help reduce air pollutants in Guildford and to improve air quality in the Guildford Town Centre Air Quality Management Area (AQMA) and actions that council will deliver between 2022 and 2027 to achieve this.</p> <p>Whilst the primary responsibility for addressing the Air Quality Management Areas (AQMA) rests with the relevant local planning authority (LPA) we are committed to work with the Council, noting that emissions arising from cars, Light Goods Vehicles (LGVs), Heavy Goods Vehicles (HGVs) and buses/coaches are identified as one of the main contributors to the air quality issues and our direct interest being the impact of the A3 on the air quality.</p> <p>The document sets Council's established relationship with the key transport infrastructure and service providers, which includes National Highways (nationally this is being done through established network of Air Quality points in our regional teams) in order to accelerate the development and delivery of appropriate improvements to meet the overall outcome, which is that there will be no requirement for Air Quality Management Areas in Guildford Borough.</p>	

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	<p>Our own Air Quality document may be of interest to you and can be accessed via the link below:</p> <p>https://nationalhighways.co.uk/our-work/environment/air-quality-and-noise/air-quality/#</p> <p>The Air Quality Action plan identifies number of actions developed by the Council to be considered under ten broad topics recommended by Defra, which echo those already included in our own strategy Air Quality Strategy (tackling vehicle emissions, the need for new technologies, innovative approaches etc.), which are either in monitoring, planning or operational management stages. In relation to the Guildford Area we are developing a Strategic Network Needs Assessment to consider options for reducing congestion on the A3 through Guildford and improving journey times. This assessment will also look at integrated transport, alternative modes (such as cycleway schemes funded through our designated funds) and active travel solutions as well as delivery of electric vehicles.</p> <p>Overall we are supportive of the draft Air Quality Action Plan and agree with the Council that large enough impact in a short timescale cannot be achieved in isolation and multiple measures will need to be implemented. We look forward to the continuous partnership with Guildford Borough Council to deliver these shared outcomes.</p> <p>Please continue to consult us as the Air Quality Action Plan develops.</p> <p>Regards</p>	

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	<p>Mrs Beata Ginn Assistant Spatial Planner (Area 3) National Highways Bridge House Walnut Tree Close Guildford GU1 4LZ Tel: +44 (0) 300 470 1118 Mobile: 0787 204 6392 Web: https://highwaysengland.co.uk/our-work/planning-and-the-strategic-road-network-in-england/</p>	
Waverley Borough Council	No formal response, but are part of the officer Steering Group.	24.08.2022 To be briefed prior to JC Meeting on revisions.
National Highways 1	<p>In responding to the consultation on Guildford Borough Council's (GBC) Air Quality Action Plan (AQAP) National Highways has set out their response mindful of the recently updated LAQM duties in the Environment Act 2021, Schedule 11, Paragraph 6 (see Annex A). The updated requirements in the Environment Act 2021 (<i>see sections 3 and 5 in Annex A</i>), required that for each measure they have a:</p> <ul style="list-style-type: none"> . Quantified level of change in annual mean NO₂ concentrations . Confirmed delivery timescales . Commitment to deliver each proposed measure with secured funding <p>National Highways comments on the draft AQAP and any potential impacts on the SRN are made against these three principals.</p> <p>Having reflected on the draft AQAP, we are unable to establish for any of the 29 proposed measures whether they would impact (either an improvement or worsening of annual mean NO₂ concentrations) on the SRN, namely the A3.</p> <p>As a general observation we note that none of the proposed measures meet with the legal duties specified in the Environment Act 2021 i.e. none of the measures have been quantified, there are no delivery timescales specified nor is there a commitment on a measure-by-measure basis to deliver any of the proposed measures.</p>	01-09-2022 Noted and amended in JC report 5.11

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	<p>To assist with the understanding of the work undertaken for the draft AQAP providing clarification for all the categories used to inform the options matrix would be greatly beneficial e.g. cost range 1 equates to >£5million and 5 up to £100k.</p> <p>National Highways is content for the ETCl to be included as a complementary measure in GBC's AQAP as the total number of vans travelling to and from the A3 to the city centre is unknown at this time, so cannot be quantified.</p> <p>National Highways continues to work with GBC to improve air quality along the A3 and support improvements in their AQMAs. However, we are unable to advise on whether any of the proposed measures would be effective in improving annual mean NO₂ concentrations as the draft AQAP as does not conform to the new reporting requirements for the purposes of LAQM.</p> <p>However, we remain committed to support GBC with the development of their AQAP and are happy to continue engaging with GBC over the coming months before the latest draft AQAP is issued in October this year.</p> <p>Annex A Extract from Environment Act 2021; Schedule 11 (https://www.legislation.gov.uk/ukpga/2021/30/schedule/11/enacted) The Environment Act 1995 is amended as follows. After section 83 insert— “83A Duties of English local authorities in relation to designated areas (1) This section applies in relation to a local authority in England. (2) A local authority must, for the purpose of securing that air quality standards and objectives are achieved in an air quality management area designated by that authority, prepare an action plan in relation to that area.</p>	

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	<p>(3)An action plan is a written plan that sets out how the local authority will exercise its functions in order to secure that air quality standards and objectives are achieved in the area to which the plan relates.</p> <p>(4)An action plan must also set out how the local authority will exercise its functions to secure that air quality standards and objectives are maintained after they have been achieved in the area to which the plan relates.</p> <p>(5)An action plan must set out particular measures the local authority will take to secure the achievement, and maintenance, of air quality standards and objectives in the area to which the plan relates, and must in relation to each measure specify a date by which it will be carried out.</p> <p>(6)A local authority may revise an action plan at any time, and must revise an action plan if it considers that there is a need for further or different measures to be taken to secure that air quality standards and objectives are achieved or maintained in the area to which the plan relates.</p> <p>(7)Subsections (8) to (10) apply where a district council in an area for which there is a county council is preparing an action plan, or a revision of an action plan.</p> <p>(8)Where the county council disagrees with the contents of the proposed plan, or the proposed revision of a plan, a referral of the matter may be made to the Secretary of State by—</p> <p>(a)the county council;</p> <p>(b)the district council preparing the plan or revision.</p> <p>(9)The Secretary of State may, on a reference made under subsection (8), confirm (with or without modifications) or reject the proposed action plan, or revision of an action plan.</p>	

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	<p>(10)Where a reference has been made under subsection (8), the district council may not finally determine the proposed action plan or revision of an action plan, except in accordance with the decision of the Secretary of State on the reference or in pursuance of a direction made by the Secretary of State under section 85.”</p> <p>[bold is National Highways emphasis]</p>	
National Highways 2	<p>I don't know if you are aware but the recent update to Env Act 2021, Schedule 11, changes the meaning of AQAPs and legal duties regarding of any and all measures agreed to an AQAP (https://nationalhighways.co.uk/our-work/environment/air-quality-and-noise/air-quality/air-quality-reports/). Para 83(A) provides more detail on the role of named measures in an AQAP.</p> <p>The main change brought about the new legislation, which came into force last November, is that any named measure in an AQAP must be delivered and achieve an improvement in air quality. This is a notable change from the previous requirements for AQAP which was more around listing possible measures, but there being no commitment (in law) to have deliver any named measures. I had a number of conversations with Government in the drafting of this element of the Bill given the possible ramifications of this change, hence my awareness of the change to this requirement.</p>	Noted and included in the JC report.
Shalford Community Council	<p>Would like to add the following comments for consideration to the AQMA consultation in addition to that covered in the consultation document. Firstly to reiterate we strongly agree with all the suggested actions but would like to add the following comments:</p> <p>1. we find it surprising that there is no link to the AQMA in Shalford as the boundary of each is so close and the issues of Shalford as a main feeder road to the gyratory system is within the Shalford AQMA</p>	<p>01-09-2022 Noted support for the measures and the direct relationship with the AQMA in The Street Shalford.</p> <p>Matters relating to the AQAP in Shalford and any approved</p>

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	<p>2. road users are the principal polluters and therefore the actual number of vehicles entering the town centre needs to be reduced dramatically</p> <p>3. this can only be achieved with a much greater increase in the use of public transport as well as facilities for cycling and walking into and around the town centre</p> <p>4. a clear air zone should be introduced at the earliest possible date with the addition of reduced speed limits to reduce pollution</p> <p>5. GBC should adopt the principal of 20mph zones within the town centre and across the borough to change the driving habits of residents and visitors across all areas. The 20's Plenty initiative is gaining support nationally and is an ideal way to reduce the spread of particulates This should include zones for different vehicle types. The appropriate one for Guildford town centre would be a Class 4 zone which covers buses, coaches, taxis, PHVs, HGVs, LGVs and cars</p> <p>6. School transport should be readdressed to reduce the number of vehicles on school runs, and a particular effort needs to be made to engage with private schools to encourage the offering of coach/mini bus transport rather than private car. the removal of the Pegasus bus scheme several years ago was a retrograde step for school transport.</p> <p>7. a reduction in public transport fares particularly for under 18's senior citizens and key workers could help shape change in people's behaviour</p> <p>8. a more joined up public transport system is needed where trains and buses link to make journeys quicker and easier and helping to encourage people out of their cars</p> <p>8. a greater commitment to spending on solving these problems is necessary. The experience of the Shalford AQMA has been that GBC has been reluctant to adopt any initiatives that involved any cost in contrast to many other cities who have committed to solving these problems.</p> <p>I hope you can take these comments into consideration although i know the consultation has now finished. As an immediate neighbour to the proposed area and having our own AQMA and recent discussions with you I am sure you will agree we are committed to making a success of any AQM initiatives within the borough</p>	<p>Guildford Town Centre AQAP are relevant</p>