



# Waverley Borough Council

## Air Quality Action Plan (Draft)

In fulfilment of Part IV of the Environment Act 1995

Local Air Quality Management

February 2023

## Waverley Borough Council

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## Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the action we will take to improve air quality in Waverley between 2023 and 2028.

This action plan replaces the previous action plan which ran from 2008. Projects delivered through the past action plan include: the Hindhead Tunnel and bypass (which alleviated congestion on the A3 with Hindhead Air Quality Management Area (AQMA) being revoked), ongoing work in relation to Farnham town centre, review of the Urban Traffic Control (UTC) system in Godalming, and the Waverley Corporate Travel Plan. Wider measures such as highlighting air alert options on Waverley Borough Council's (WBC's) website, behavioural change campaigns and working with schools to reduce emissions associated with the school run have also been delivered. It is not feasible to determine the specific impacts of these individual schemes, although these, as well as measures implemented at county, national and international levels have resulted in trends in reductions in concentrations across Waverley.

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas<sup>1,2</sup>.

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion<sup>3</sup>. Waverley Borough Council is committed to

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<sup>1</sup> Environmental equity, air quality, socioeconomic status and respiratory health, 2010

<sup>2</sup> Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

<sup>3</sup> Defra. Abatement cost guidance for valuing changes in air quality, May 2013

reducing the exposure of people in Waverley to poor air quality in order to improve health.

Actions have been developed that can be considered proportionate to the air quality objective exceedances within the AQMAs. Therefore, measures are focussed on what can be delivered in the next few years. This AQAP is complemented by a Clean Air Strategy (CAS), which considers measures much more widely across Waverley, which will also help to reduce emissions within the AQMAs. The CAS is therefore included as an appendix. Where measures have been considered, but discounted, they are included in Appendix B under the broad topics outlined in Defra's reporting templates.

Our priorities are

- to work collaboratively with SCC to ensure that the Farnham Infrastructure Programme is agreed and delivered, and displacement of traffic does not become a risk to the achievement of air quality objectives elsewhere in Farnham. This will be undertaken through modelling the air quality impacts of the preferred options to assist in decision making;
- to adopt and implement the Waverley Clean Air Strategy, which this Action Plan supports (incorporating measures to reduce emissions across Waverley), which will assist in improving air quality and therefore maintaining concentrations below air quality objectives in Godalming and Farnham; and
- Report on an annual basis the implementation of both the Farnham Infrastructure Programme and the Waverley Clean Air Strategy, as well as monitored concentrations within the AQMA.

In this AQAP we outline how we plan to effectively tackle air quality issues within our control. However, we recognise that there are a large number of air quality policy areas that are outside of our influence (such as vehicle emissions standards agreed in Europe), but for which we may have useful evidence, and so we will continue to work with regional and central government on policies and issues beyond Waverley Borough Council's direct influence.

## Responsibilities and Commitment

## Waverley Borough Council

This AQAP was prepared by the Environmental Protection team of Waverley Borough Council with the support and agreement of the following officers and departments:

Transport Studies, Surrey County Council  
Environmental Health Manager (Environmental Protection) (WBC)  
Environmental Health Officer (Air Quality) (WBC)  
Air Quality Consultants  
Portfolio Holder for Environment and Sustainability (WBC)  
Sustainable Transport Projects Officer (WBC)  
Comms and Engagement Manager (WBC)  
Portfolio Holder for Planning and Economic Development  
Guildford Air Quality (Guildford Borough Council)  
Development Lead Strategic Sites (WBC)  
Surrey County Councillor for Farnham North (Surrey County Council)  
Senior Planning Policy Officer (WBC)  
Economic Development Manager (WBC)  
Councillor - Farnham Town Council  
Executive Head of Regulatory Services (WBC)  
Public Health (Surrey County Council)  
Sustainability Manager (WBC)  
Surrey County Council Green Futures

This AQAP has been approved by the Executive Head of Regulatory Services. On behalf of the Surrey County Council Director of Public Health, the Public Health team work closely with Surrey Air Alliance including District and Borough Council partners responsible for submitting Annual Statement Reports (ASR) on air quality within their area; to develop initiatives, air quality action plans, and implement actions to improve air quality across the county of Surrey. Public Health is also contributing to the development of a Clean Air Strategy for Waverley.

The AQAP will be reviewed by the Climate Change Emergency Board and Overview and Scrutiny for Services prior to going out to consultation.

## **Waverley Borough Council**

This AQAP will be subject to an annual review, appraisal of progress, with progress each year reported in the Annual Status Reports (ASRs) produced by Waverley Borough Council, as part of our statutory Local Air Quality Management duties.

If you have any comments on this AQAP please send them to Environmental Health at: Waverley Borough Council, Council Offices, The Burys, Godalming, Surrey, GU7 1HR

Telephone: 01483 523393

Email: [Environmentalhealth@waverley.gov.uk](mailto:Environmentalhealth@waverley.gov.uk)

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# 1 Introduction

This report outlines the actions that Waverley Borough Council will deliver between 2023 and 2028 in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to Waverley Borough Council's administrative area.

It has been developed in recognition of the legal requirement on the local authority for the AQAP to *have the purpose of securing that air quality objectives are achieved*. The air quality objectives are set under Part IV of the Environment Act 1995<sup>4</sup>, Part 4 of the Environment Act 2021<sup>5</sup>, and relevant regulations made to meet the requirements of the Local Air Quality Management (LAQM) statutory process.

This Plan will be reviewed every five years at the latest and progress on measures set out within this Plan will be reported on annually within Waverley Borough Council's air quality Annual Status Report (ASR).

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<sup>4</sup> Available at <https://www.legislation.gov.uk/ukpga/1995/25>

<sup>5</sup> Available at <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

## 2 Summary of Current Air Quality in Waverley

Air quality in Waverley is generally good when compared to national air quality objectives. There are currently two AQMAs declared for the nitrogen dioxide annual mean air quality objective in Godalming and Farnham. This AQAP includes actions for both of the AQMAs. Figures 1 and 2 illustrate monitoring data for 2019 within, and just outside, each of the AQMAs. These monitoring sites are part of a wider monitoring strategy across the borough, for both nitrogen dioxide and PM<sub>10</sub>.

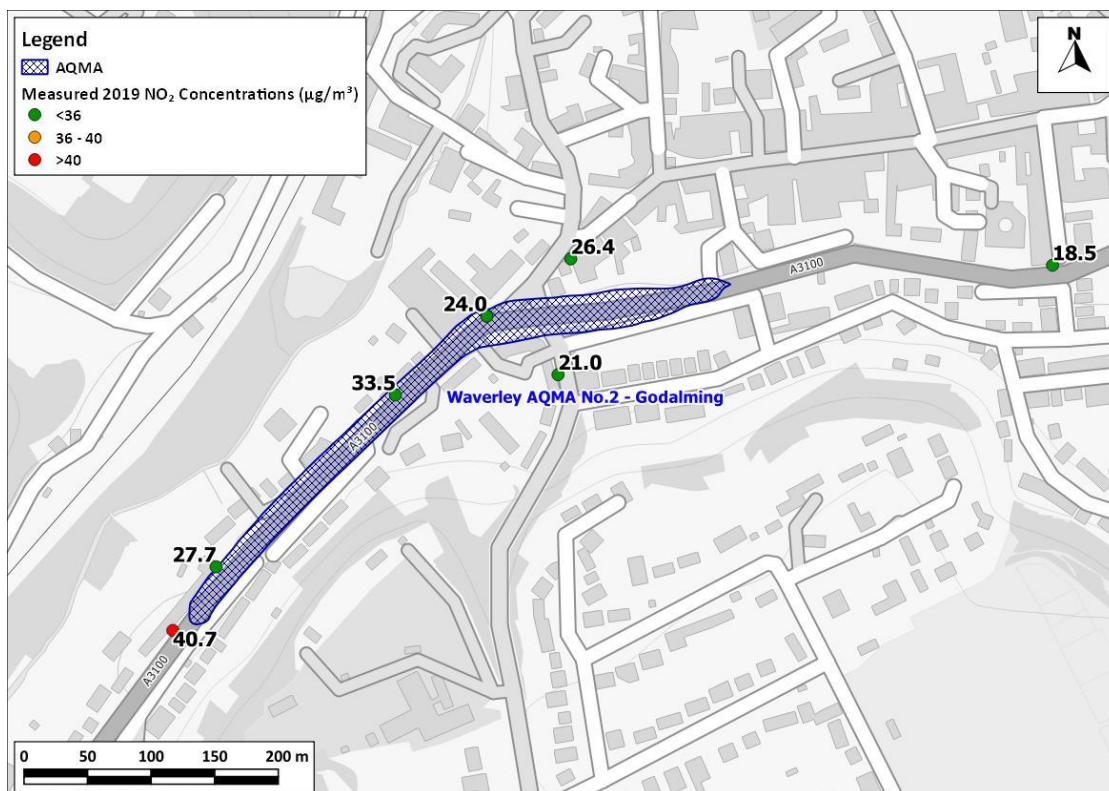
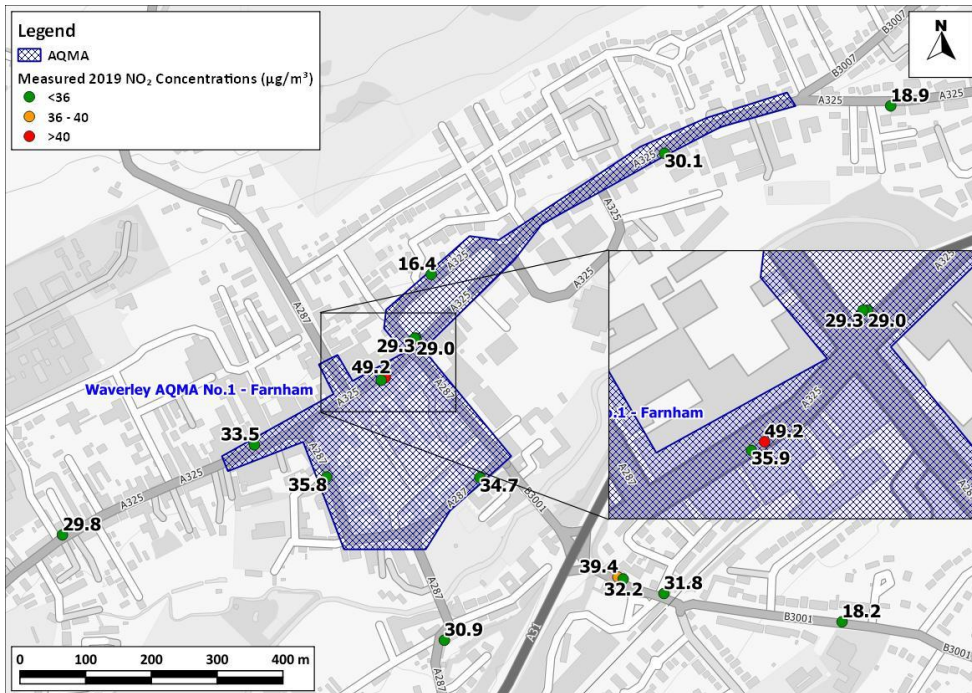


Figure 1 Godalming AQMA showing 2019 monitored concentrations



**Figure 2 Farnham AQMA showing 2019 monitored concentrations**

In Godalming, there was a marginal exceedance just outside the AQMA on Ockford Road in 2019. This is representative of one property with a porch which is closer to the carriageway than other residential properties, the road at this location is on a gradient, with reduced dispersion due to the effect of houses and hedges creating a ‘canyon’. Since 2019, concentrations at this site have been well below the objective (32.9  $\mu\text{g}/\text{m}^3$  in 2020 and 33.7  $\mu\text{g}/\text{m}^3$  in 2021).

In Farnham, the exceedance is restricted to diffusion tube site WBC9 which is located on The Borough, which measured 49.2  $\mu\text{g}/\text{m}^3$  in 2019. However, WBC9 is at ground floor level, with relevant exposure in flats above the shops, and a tube (WBC51) is situated higher up the building to represent relevant exposure, which has been below the objective in both 2019 and 2021 (no annual mean reported in 2020). Since 2019 WBC9 has also been below the objective (33.6  $\mu\text{g}/\text{m}^3$  in 2020 and 34.1  $\mu\text{g}/\text{m}^3$  in 2021).

Although the exceedances are marginal in 2019, actions to improve air quality at these locations are set out in this Plan, which is in line with WBCs statutory requirements within the LAQM process. It should be noted that Upper Hale Road in Farnham is currently (2021) measuring concentrations marginally higher than the Borough (35.1  $\mu\text{g}/\text{m}^3$  at WBC4), and this location is representative of facades of

properties nearby, however this is below relevant air quality objectives. The AQAP has, however, been developed, with the aim that concentrations will not worsen at this location as a result of any actions within this plan.

All measurements are subject to uncertainty, and data from diffusion tubes are adjusted in relation to the laboratory and preparation method (a process termed bias adjustment) in order to reduce the uncertainty of annual means. However, Defra in recognition of this inherent uncertainty, recommend that the revocation of an AQMA should only be considered following three consecutive years of annual mean nitrogen dioxide concentrations being lower than  $36 \mu\text{g}/\text{m}^3$  (i.e., within 10% of the annual mean objective). In addition, pollutant concentrations may vary significantly from one year to the next, due to the influence of meteorological conditions, and Waverley Borough Council should be reasonably certain that any future exceedances (that might occur in more adverse meteorological conditions) are unlikely, before revoking an AQMA. This AQAP takes into account these inherent uncertainties, while also taking a proportionate approach.

Alongside this AQAP, a Clean Air Strategy (CAS) has also been developed which includes more strategic actions, which will not only positively impact on the AQMAs, but also across the borough, including Upper Hale Road.

Waverley Borough Council's Annual Status Reports can be found at <https://www.waverley.gov.uk/Services/Environmental-concerns/Pollution-control/Air-quality/Air-quality-reports>.

## 3 Waverley's Air Quality Priorities

### 3.1 Public Health Context

Air pollution is a major public health risk ranking alongside cancer, heart disease and obesity. A review by the World Health Organisation concluded that long-term exposure to air pollution reduces life expectancy by increasing the incidence of lung, heart and circulatory conditions. The Department of Health and Social Care's advisory Committee on the Medical Effects of Air Pollutants (COMEAP) has estimated that long-term exposure to man-made air pollution in the UK has an annual impact on shortening lifespans, equivalent to 28,000 to 36,000 deaths<sup>6</sup> (COMEAP, 2018). Poor air quality can affect health at all stages of life. Those most affected are the young and old. In the womb, maternal exposure to air pollution can result in low birth weight, premature birth, stillbirth or organ damage. In children, there is evidence of reduced lung capacity, while impacts in adulthood can include diabetes, heart disease and stroke. In old age, a lifetime of exposure to air pollution can result in reduced life-expectancy and reduced wellbeing at end of life. There is also emerging evidence for a link between air pollution and an acceleration of the decline in cognitive function (Defra, 2019)<sup>7</sup>.

Poor air quality disproportionately affects the poorest and most vulnerable in our communities including children. Public health not only aims to improve health, but also reduce health inequalities by using an evidence-based approach to make recommendations on the delivery of health and wellbeing services. As such, this AQAP will support work underway within the public health arena.

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<sup>6</sup> <https://www.gov.uk/government/publications/nitrogen-dioxide-effects-on-mortality/associations-of-long-term-average-concentrations-of-nitrogen-dioxide-with-mortality-2018-comeap-summary>

<sup>7</sup> <https://www.gov.uk/government/publications/clean-air-strategy-2019>

This AQAP will complement work underway at County level. Public Health staff have drafted the Joint Strategic Needs Assessment (JSNA)<sup>8</sup> which is an assessment of the current and future health and social care needs of the local community. The JSNA informs the Health and Wellbeing Strategy (HWS)<sup>9</sup> which is a strategy for meeting the needs identified in the JSNA. These are needs that could be met by the local authority, Integrated Care Boards or NHS England. Within the JSNA there is a section on air quality.

The Public Health Outcome Framework (PHOF) for England recognises the burden of ill health resulting from poor air quality. PHOF Indicator D01 reports that 5.7% of deaths in Waverley during 2020 were attributable to particulate air pollution (PM<sub>2.5</sub>) (undertaken using the 'new method'), which is slightly lower than for Surrey (6.2%) but slightly higher than the England average, 5.6%<sup>10</sup>.

## 3.2 Planning and Policy Context

### Waverley Corporate Strategy 2020-2025

The Waverley Corporate Strategy<sup>11</sup> sets out the vision *'that Waverley will be environmentally, economically and financially sustainable with healthy, inclusive communities and housing available for all who need it'*. The Strategy sets out the strategic priorities of the Council which include:

- Supporting a strong, resilient local economy;
- Taking action on Climate Emergency and protecting the environment;

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<sup>8</sup> <https://www.surreyi.gov.uk/jsna/>

<sup>9</sup> <https://www.healthysurrey.org.uk/about/strategy>

<sup>10</sup> Data available at <https://fingertips.phe.org.uk/profile/public-health-outcomes-framework/data#page/1/gid/1000043/pat/6/par/E12000008/ati/101/are/E07000216/yrr/1/cid/4/tbm/1>

<sup>11</sup> <https://www.waverley.gov.uk/Services/Council-information/About-Waverley-Borough-Council/Corporate-Strategy-2020-25>

- Effective strategic planning and development management to meet the needs of our communities; and
- Improving the health and wellbeing of our residents and communities.

As well as the commitment to be carbon neutral by 2030, WBC has included a number of high level commitments to deliver the strategic priorities above, such as

- promoting a pedestrian-friendly and cycle friendly transport network; and
- taking action on air quality issues, especially those caused by vehicle emissions, and encouraging zero-carbon buses and taxis.

This AQAP therefore directly complements the overall vision of the Council, and will assist in delivering the above priorities.

## **Local Plan**

The Local Plan Part 1: Strategic Policies and Sites (LPP1)<sup>12</sup>, adopted in 2018, sets out the Council's spatial framework for delivering the development and change needed to realise the vision for development in Waverley up to 2032. Local Plan Part 2 (LPP2) will form the second stage of Waverley's new Local Plan. Together with LPP1 this document will replace the 2002 Local Plan. LPP2 will provide the more detailed 'Development Management' policies, review a suite of local designations and will allocate sites needed for housing or other uses in certain areas of Waverley.

LPP1 has a number of references to air quality. In Policy ST1 Sustainable Transport:

*“The Council will work in partnership with Surrey County Council, neighbouring authorities, transport providers and other key stakeholders to ensure that development schemes:*

*.... 7. are consistent with the objectives and actions within the Air Quality Action Plan”*

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<sup>12</sup> <https://www.waverley.gov.uk/Services/Planning-and-building/Planning-strategies-and-policies/Local-plan/Local-Plan-Part-1>

LPP2 (Pre-Submission Document) currently includes Policy DM1 as follows:

DM1: Environmental Implications of Development

*“Development should:*

*a) Avoid harm to the health or amenity of occupants of nearby land and buildings, and future occupants of the development, including by way of an unacceptable increase in pollution, light, noise, dust, vibration, and odour, or an increase in flood risk;*

*b) Not cause a deterioration to the environment by virtue of potential pollution of air, soil or water, including that arising from the storage and use of hazardous substances, while seeking opportunities to improve air and water quality where possible; ....”*

One of the objectives of LPP1 is *“to support the delivery of at least 11,210 additional homes in Waverley in the period 2013 to 2032 (an average of 590 homes a year). To contribute to the delivery of sustainable communities by directing most new development to the main settlements of Farnham, Godalming, Haslemere and Cranleigh, where there is the best available access to jobs, services and other facilities”*. This includes a new settlement of 2,600 homes at the Dunsfold Aerodrome site. Particularly where large-scale development is planned, air quality must be fully considered from an early stage in the process, and air quality is referenced within the Dunsfold Park Garden Village Supplementary Planning Document. This AQAP will ensure that the principles set out in LPP1 and LPP2 will contribute to improving air quality within the AQMAs, and more widely.

### **Local Transport Plan**

Surrey County Council is updating its Local Transport Plan<sup>13</sup>, which sets out the changes required to achieve net zero emissions by 2050. SCC are committed to

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<sup>13</sup> <https://www.surreycc.gov.uk/roads-and-transport/policies-plans-consultations/transport-plan/strategies/air-quality-strategy>



significantly transforming transport networks to meet this national target and LTP4 sets out the following key policies:

- Active travel and personal mobility;
- Public and shared transport;
- Promoting zero emission vehicles; and
- Planning for Place.

In the short-term (to 2025), LTP measures will be focused on achieving a 'green' and 'healthy' recovery of transport choices after Covid-19, and taking action and strengthening transport links to deliver the planning, development, design, public space management and digital connectivity aspects of the LTP4. This also includes building on the increased interest in walking and cycling to start a 'shift' away from car dependency, rebuilding trust in public transport, accelerating EV uptake, continuing to build on existing good practice, and delivery of relevant schemes. All of these shifts will reduce local air quality emissions and therefore assist with the delivery of this AQAP.

### **Farnham Infrastructure Programme**

Surrey County Council, Waverley Borough Council, Farnham Town Council and the local MP are working together to transform Farnham and its surrounding areas by addressing issues such as congestion and air quality, through the Farnham Infrastructure Programme (FIP). Objectives of the programme include:

- To rapidly reduce carbon emissions, ensuring that Farnham and Waverley are on track for net zero by 2050 (note WBC has committed to becoming a carbon neutral council by 2030);
- Provide well-connected communities across Farnham;
- Support the economic vitality of Farnham and enable sustainable growth; and
- Improve the quality of place in Farnham with clean air, healthy lifestyles, and less dominance of traffic on communities.

The Farnham Optimised Infrastructure Plan<sup>14</sup> sets out the policy context, challenges and opportunities, objectives, potential options and emerging strategy and next steps to be undertaken to deliver improvements in Farnham.

The proposals which have recently been consulted on are:

- Castle Street and Downing Street improvements;
- Changing the traffic flow direction, and widening pavements on The Borough, Castle Street and Downing Street; and
- Options to reduce congestion on the A31 and to improve crossings for pedestrians and cyclists, and for public transport.

Currently, a 'hybrid' option (combining bullet points 1 and 2 above) is being modelled using a traffic model, which will then provide input data for an air quality dispersion model. The FIP is supported by other projects being implemented by SCC including a short and medium term improvements or 'quick wins' project<sup>15</sup> looking at what can be implemented quickly in the town, and the Farnham Local Cycling and Walking Infrastructure Plan (LCWIP). The options being implemented within the 'quick wins' project are the re-routing of HGVs, implementation of 20 mph zones, removing A road status for roads that cross the town centre and addressing concerns related to narrow pavements and pedestrian safety. Further clarity on the preferred option to be implemented will be forthcoming in due course.

### Waverley Carbon Neutrality Action Plan 2020-2030

In 2019 WBC declared a climate emergency and committed to becoming a carbon neutral council by April 2030. The plan provides a statement of the council's areas of focus to achieve a carbon neutral borough, which will evolve as projects and actions

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<sup>14</sup> Available at <https://www.surreycc.gov.uk/roads-and-transport/policies-plans-consultations/major-transport-projects/farnham-infrastructure-programme/farnham-infrastructure-programme-key-documents>

<sup>15</sup> Short and medium-term improvements or 'quick wins' project - Surrey County Council ([surreycc.gov.uk](https://www.surreycc.gov.uk))

are developed further<sup>16</sup>. Seven key priority areas have been identified each containing a number of high-level targets that will focus efforts to achieve the ambitious carbon neutral target. Embedding a carbon neutral culture within processes and policies is significant to sustaining long term change. Key priority areas include a focus on active travel and air quality, focus on energy generation, a focus on the built environment, on land use and adaptation, and on supporting a green economy, all of which complement the aims of this AQAP.

### **Air Quality Action Plan (July 2008)**

The previous action plan adopted in 2008<sup>17</sup> contained specific actions for the (then) three AQMAs. In relation to Farnham, the town centre package, as outlined in the Farnham Review Study, was supported. This featured a number of different strands including measures to increase active travel, changes in delivery patterns, traffic management, and a reallocation of road space for pedestrians. However, in response to local concerns, particularly in relation to a displacement of traffic causing issues elsewhere, further feasibility work was recommended. In relation to Godalming, work to update the existing urban traffic control (UTC) system was highlighted, in order to reduce congestion and improve air quality. Other wider measures were also included in the previous Air Quality Action Plan, such as the Waverley Corporate Travel Plan, behaviour change campaigns and school travel plans.

## **3.3 Source Apportionment**

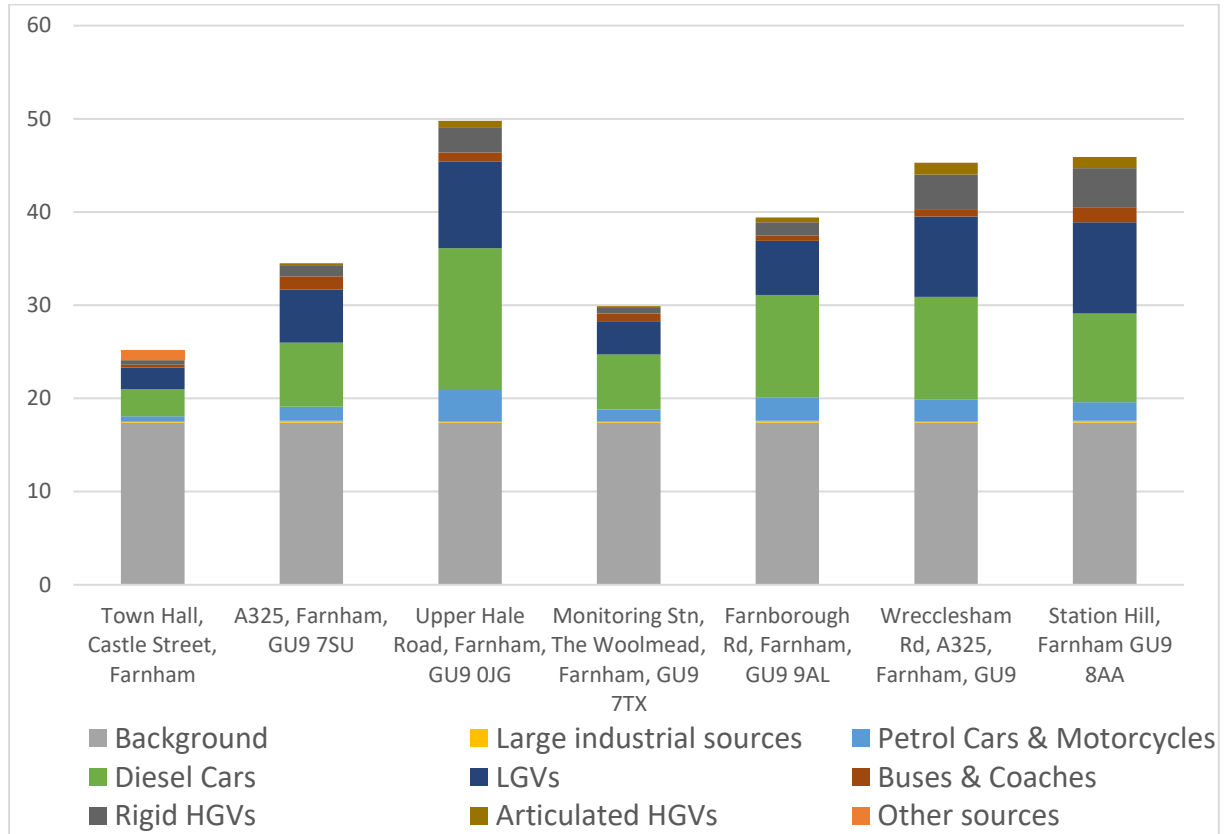
The AQAP measures presented in this report are intended to be targeted towards the predominant sources of emissions within the AQMAs.

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<sup>16</sup> <https://www.waverley.gov.uk/Services/Environmental-concerns/Sustainability-and-conservation/Climate-change-strategy-and-action-plan>

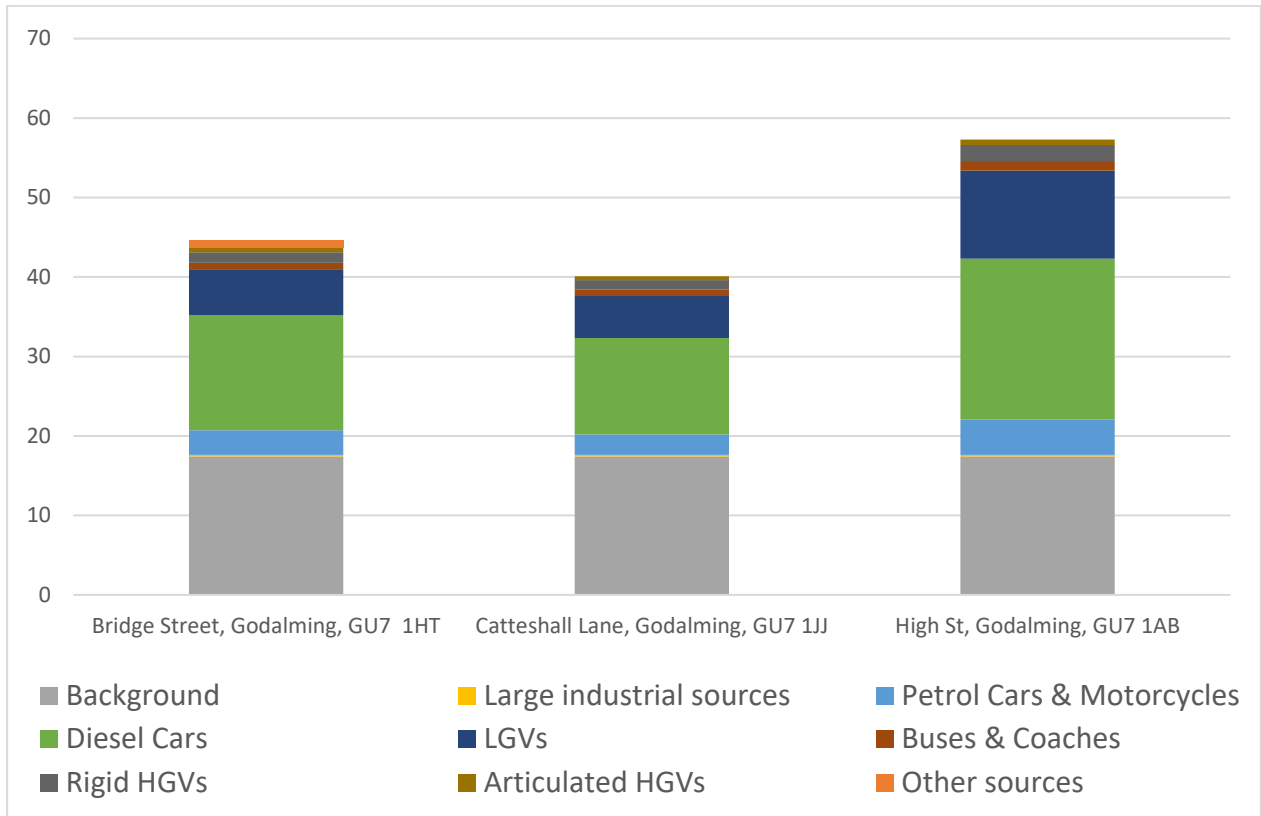
<sup>17</sup> <https://www.waverley.gov.uk/Services/Environmental-concerns/Pollution-control/Air-quality/Air-quality-reports>

A source apportionment exercise was carried out by CERC as part of a wider modelling study across Surrey<sup>18</sup> in 2019 using a base year of 2017. This identified that within the AQMAs, the source contributions were as follows:



**Figure 3: Source Apportionment ( $\mu\text{g}/\text{m}^3 \text{NO}_2$ ) in 2017 for locations in Farnham (CERC, 2019)**

<sup>18</sup> Detailed Air Quality Modelling and Source Apportionment (August 2019) Available at: [https://www.guildford.gov.uk/media/32331/Detailed-air-quality-report/pdf/FM1183\\_Surrey\\_CERC\\_Guildford\\_19Nov19.pdf?m=637296299125670000](https://www.guildford.gov.uk/media/32331/Detailed-air-quality-report/pdf/FM1183_Surrey_CERC_Guildford_19Nov19.pdf?m=637296299125670000). Further Interpretation of air quality modelling in Waverley, carried out for Surrey local authorities (March 2020) Available at: [https://www.waverley.gov.uk/Portals/0/Documents/services/environmental-concerns/pollution-control/air%20quality/Further\\_interpretation\\_of\\_air\\_quality\\_modelled\\_in\\_Waverley\\_from\\_CERC\\_\\_\\_March\\_2020.pdf?ver=FuKDzFNczauvtmwyM2DAw%3D%3D](https://www.waverley.gov.uk/Portals/0/Documents/services/environmental-concerns/pollution-control/air%20quality/Further_interpretation_of_air_quality_modelled_in_Waverley_from_CERC___March_2020.pdf?ver=FuKDzFNczauvtmwyM2DAw%3D%3D)



**Figure 4: Source Apportionment (µg/m³ NO<sub>2</sub>) in 2017 for locations in Godalming (CERC, 2019)**

Although Figure 3 and Figure 4 are based on modelling undertaken for 2017 across Surrey (and hence not locally verified), the source contribution provides a useful indication of the contributions from different vehicle types within each of the AQMAs, which can be used to ensure that measures are appropriately targeted. In Farnham, after background concentrations have been accounted for, diesel cars, LGVs and rigid HGVs contribute the most to overall concentrations. In Godalming, there is a similar picture in that diesel vehicles predominate with respect to NO<sub>x</sub> emissions.

### 3.4 Required Reduction in Emissions

The improvement in road NO<sub>x</sub> emissions in order to meet the objective at monitored locations where concentrations exceeded the objective in 2019, is shown in

Table 1, categorised by AQMAs. As set out in LAQM Technical Guidance TG22<sup>19</sup> paragraphs 7.115 to 7.117, any required percentage reductions of local emissions should be expressed in terms of NO<sub>x</sub> due to local road traffic. This is because the primary emission is NO<sub>x</sub> and there is a non-linear relationship between NO<sub>x</sub> concentrations and NO<sub>2</sub> concentrations. The following calculations use the 2019 monitored NO<sub>2</sub> concentrations presented in the Annual Status Report 2022, and the methodology set out in TG22 Box 7.6. The 'Road NO<sub>x</sub> - current' concentration has been calculated by using the NO<sub>x</sub> to NO<sub>2</sub> calculator. The road NO<sub>x</sub> concentration required to give a total NO<sub>2</sub> concentration of 40 µg/m<sup>3</sup> (road NO<sub>x</sub>-required) has been calculated using the NO<sub>x</sub> to NO<sub>2</sub> calculator by entering a total NO<sub>2</sub> concentration of 40µg/m<sup>3</sup>, along with the background NO<sub>2</sub> concentration. Mapped backgrounds<sup>20</sup> have been used. The ratio of 'road NO<sub>x</sub>-required' to 'road NO<sub>x</sub>-current' gives the required percentage reduction in local road NO<sub>x</sub> emissions to achieve the objective.

WBC51 was 32.2 µg/m<sup>3</sup> in 2019 and therefore no improvements are required to achieve the air quality objective. WBC9, which was above the objective is not a relevant location for the air quality objective. In Godalming, approximately 3% reduction in road NO<sub>x</sub> emissions is required to achieve the objective, based on 2019 emissions (WBC31). It should be noted that since 2019 emissions have reduced at these locations, evidenced by lower concentrations which are below the air quality objectives. This is likely to be due to both fleet improvements, and, especially in 2020 the impact of travel restrictions put in place with regards to the Covid pandemic.

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<sup>19</sup> Available at <https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>

<sup>20</sup> <https://laqm.defra.gov.uk/air-quality/air-quality-assessment/background-maps/>

**Table 1: Percentage Decrease in Road NO<sub>x</sub> required to Meet Annual Mean NO<sub>2</sub> Objective at Relevant Modelled Receptors (µg/m<sup>3</sup>) in 2019**

Diffusion Tube	Annual Mean Contribution (µg/m <sup>3</sup> )				% Decrease in Road NO <sub>x</sub> to Meet Objective	
	Monitored NO <sub>2</sub> Concentration	Road NO <sub>x</sub> - Current (a)	Road NO <sub>x</sub> – Required (b)	Background NO <sub>2</sub> (for information)	Difference between a and b	
<b>AQMA 1 Farnham</b>						
WBC51	32.2 µg/m <sup>3</sup>	36.28 µg/m <sup>3</sup>	53.49 µg/m <sup>3</sup>	13.73 µg/m <sup>3</sup>	Lower than objective	no reduction required
<b>AQMA 2 Godalming</b>						
WBC31	40.7 µg/m <sup>3</sup>	60.49 µg/m <sup>3</sup>	58.87 µg/m <sup>3</sup>	11.12 µg/m <sup>3</sup>	1.62 µg/m <sup>3</sup>	2.68%

### 3.5 Key Priorities

Based on the source apportionment, and the fact that the objectives have been achieved at all sites in 2020 and 2021, the following priorities are proportionate, and will ensure that transport related emissions are reduced. In order to reduce NO<sub>2</sub> concentrations, reductions need to focus on diesel vehicles, at the relevant locations, particularly cars, LGVs and to a lesser extent HGVs.

- Priority 1 – to work collaboratively with SCC to ensure that the Farnham Infrastructure Programme is agreed and delivered, and displacement of traffic does not become a risk to the achievement of air quality objectives elsewhere in Farnham. This will be undertaken through modelling the air quality impacts of the preferred options to assist in decision making;
- Priority 2 – adopt and implement the Waverley Clean Air Strategy, which this Action Plan supports (incorporating measures to reduce emissions across Waverley); and
- Report on an annual basis the implementation of both the Farnham Infrastructure Programme and the Waverley Clean Air Strategy, as well as monitored concentrations within the AQMA.

## 4 Development and Implementation of Waverley Borough Council's AQAP

### 4.1 Consultation and Stakeholder Engagement

In developing/updating this AQAP, we have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 4.1. This consultation version of the AQAP, alongside the Clean Air Strategy, will be widely consulted on, both online and through events with the Town and Parish Councils. A version of the document will be made available online, with an online questionnaire for direct feedback. The consultation will be advertised through local media, including social media.

The response to our consultation stakeholder engagement is given in Appendix A: Response to Consultation.

**Table 4.1 – Consultation Undertaken**

Consultee	Consultation Undertaken
The Secretary of State	Yes
The Environment Agency	Not applicable for these locations
The highways authority	Yes
All neighbouring local authorities	Yes
Other public authorities as appropriate, such as Public Health officials	Yes
Bodies representing local business interests and other organisations as appropriate	Yes



## 4.2 Steering Group

A Steering Group was set up in order to take this Action Plan revision forward. Up to the publication of this draft, three Steering Group meetings have been held (13<sup>th</sup> September, 18<sup>th</sup> October 2022 and 31<sup>st</sup> January 2023). The meetings have involved; setting out the background to the air quality issue in Waverley, the process of the Action Plan and Clean Air Strategy, previous work undertaken on air quality (for example Surrey wide air quality modelling undertaken) and gaining input and insight into existing and future policy measures within Waverley and how these may assist in the implementation of the aims of this Plan (and vice versa). Some discussions around evaluation of the measures included were also held. The third meeting discussed the outcomes of the consultation process and specific changes required. Surrey County Council, as Highways Authority are key to the implementation of the transport measures within the plan, and their input is paramount to the success of this plan. The Steering Group has also had political representation and input from both Waverley Borough Council and Surrey County Council. Also included were public health colleagues from SCC, planning and climate change officers. The Steering Group will continue to be fully involved, and consulted on as the process continues.

## 5 AQAP Measures

Table 5.1 shows the Waverley Borough Council AQAP measures. It contains:

- a list of the actions that form part of the plan
- the responsible individual and departments/organisations who will deliver this action
- estimated cost of implementing each action (overall cost and cost to the local authority)
- expected benefit in terms of pollutant emission and/or concentration reduction
- the timescale for implementation
- how progress will be monitored

**NB:** Please see future ASRs for regular annual updates on implementation of these measures

These measures specific to each of the AQMAs reflects the current status of the statutory air quality objectives in each of the areas. As exceedances of the objectives were marginal in 2019 and there were no exceedances in 2020 or 2021, measures are proportionate, and also reflect resource limitations within the Council. Importantly, this plan is written alongside a Clean Air Strategy, which takes a more strategic view of air quality improvements across the Borough, and reflects that health effects arise from both PM<sub>2.5</sub> as well as NO<sub>x</sub> emissions, acknowledging that health effects are apparent even below current air quality objectives. WBC are fully committed to reducing emissions across the borough, both through this AQAP and through the implementation of the Clean Air Strategy, as well as working collaboratively in related policy areas such as the Local Plan, all of which will assist in reducing concentrations within the AQMAs. Of particular note are the ambitious targets within LTP4 to increase active travel, encourage a switch to Zero Emission Vehicles and implement policies on placemaking. WBC's commitment to work towards becoming net zero will reduce Greenhouse Gas emissions not only in relation to transport, but also more widely for example in energy generation, which will assist in the reduction of local air pollutant emissions, both directly and in reducing background concentrations.

In relation to Farnham, the Farnham Infrastructure Programme is still being worked on, with a number of options still being assessed, most recently, a hybrid option combining the two previous options<sup>21</sup> is being modelled in terms of traffic and air quality; therefore the adopted package of agreed measures has not been defined. There is also, currently, no specific funding attached to the programme, and for these reasons, the measures for Farnham will be reviewed 6 months after adoption of this plan, in order to ensure that there is progress in the agreement and funding of measures. It will also be ensured that the Farnham AQMA will remain in place until the Farnham Infrastructure Programme is implemented.

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<sup>21</sup> These included Castle Street and Downing Street improvements and changing the traffic flow direction, and widening pavements on The Borough, Castle Street and Downing Street

Table 5.1 – Air Quality Action Plan Measures - Farnham

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
1	Farnham Infrastructure Programme: Town Centre Changes	Traffic Management	UTC, Congestion Management, Traffic reduction	2023	2025	Surrey County Council, Farnham Town Council, Waverley Borough Council	SCC and external funding pots	No	Not funded	Depends on which option is taken forward	In planning stage – consultation response s being analysed prior to discussion with Member board	Achievement / maintenance of air quality objective compliance	Measured Concentration at Diffusion Tube Locations within AQMA	Consultation concluded October 2022	Air Quality Assessment still to be undertaken. Agreement between different tiers of Government, multiple approval processes, Funding, Officer time for implementation
2	Farnham Infrastructure Programme: Implementing outcomes of 'quick wins' project	Freight and Delivery Management	Route Management Plans/ Strategic routing strategy for HGV's	2022	2022	Surrey County Council, Farnham Town Council, Waverley Borough Council	SCC	No	SCC funded	<£25k	Environmental weight limit implemented to restrict HGV movements through the town centre	Achievement / maintenance of air quality objective compliance	Measured Concentration at Diffusion Tube Locations within AQMA, increase in Active Travel	Completed	Current concerns are (a) enforcement and (b) whether such restrictions should and could be implemented elsewhere in the area

Waverley Borough Council

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
3	Farnham Local Cycling and Walking Infrastructure Plan (LCWIP)	Promoting Travel Alternatives	Promotion of Cycling Promotion of Walking	2023 for adoption of LCWIP	2033 for completion of implementation	Surrey County Council, Farnham Town Council, Waverley Borough Council	DfT	No	Not funded	LCWIP is strategic document outlining prioritised measures. Cost is dependant on what will be adopted – funding to be bid for	LCWIP currently being consulted on.	Achievement / maintenance of air quality objective compliance	Increase in Active Travel, Measured Concentration at Diffusion Tube Locations within AQMA	Town and Parish Councils have been consulted, due to go to committee by end of 2022	Dependent upon which schemes will be submitted by SCC as part of DfT's Active Travel funding tranches
4	Encouragement of Electric Vehicles <sup>22</sup> in Farnham through EV infrastructure	Promoting Low Emission Transport	Procuring alternative refuelling infrastructure to promote LEVs	2022	Ongoing through period of AQAP	Surrey County Council, Farnham Town Council, Waverley Borough Council	SCC OLEV	No	Partly funded	£100 - £500K	Ongoing	Achievement / maintenance of air quality objective compliance	Use of chargers, increase in proportion of EVs in the fleet in Farnham	Public EV Charging in Riverside Car Park 3 x 6CPs, and Brightwel	Funding, officer time for implementation

<sup>22</sup> it is important to note that EVs are not viewed as a solution to all transport-related health issues. While EVs have significant air quality benefits over conventional petrol and diesel fuelled vehicles, they still create air pollution in the form of small particulates from the wear on brake discs and tyres, which can be harmful to human health. Walking, cycling and travel by public transport remain essential to improving air quality as well as tackling congestion and encouraging physical activity. As such, EVs need to be considered as complementary to a wider sustainable transport approach.

Waverley Borough Council

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
	improvements, including the uptake of EV taxis and buses.													Is x 18CPs	
5	Consistent process for Air quality assessments for developments likely to impact on air quality, including committed development within and outside Waverley	Policy Guidance and Development Control	Planning Guidance	Ongoing	Ongoing	WBC and neighbouring authorities	Within existing budgets	No	n/a	Not explicitly costed as mainly staff time	Currently air quality assessments are requested, as well as mitigation where required. This measure will ensure consistency in the process	Long term targets for reduction in emissions in line with Defra targets	Number of planning applications reviewed and commented on	Ongoing	The process of assessment will ensure that cumulative impacts are incorporated where possible. Collaborative working across boroughs will take applications in neighbouring authorities into account
6	Waverley Clean Air Strategy	Policy Guidance and	Low Emissions	2023	2028 for completion of	Waverley Borough Council with partners,	Within existing budgets	Some projects may be eligible	Partially funded	£10k - £50k	Going through approvals process	Aimed at emissions reductions across Waverley.	Achievement of targets to be	Draft report available for	Resource issues with all organisations, as most of

## Waverley Borough Council

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
		Development Control	strategy		implementation	SCC, Parish Councils, etc		for Defra Grant funding			including consultation	Will tie in with targets announced by Defra	announced by Defra.	consultation	actions are not statutory

**Table 5.2 – Air Quality Action Plan Measures - Godalming**

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
1	Waverley Clean Air Strategy	Policy Guidance and Development Control	Low Emissions strategy	2023	2028 for completion of implementation	Waverley Borough Council with partners, SCC, Parish Councils, etc	Within existing budgets?	Some projects may be eligible for Defra Grant funding	Partially funded	£10k - £50k	Going through approvals process including consultation	Aimed at emissions reductions across Waverley. Will tie in with targets to be announced by Defra	Achievement of targets announced by Defra.	Draft report available for consultation	Resource issues with all organisations, as most of actions are not statutory
2	Encouragement of Electric Vehicles	Promoting Low Emission Transport	Procuring alternative refuelling	2022	Ongoing through period	Surrey County Council, Godalming Town Council,	SCC OLEV	No	Partly funded	£100 - £500K	Ongoing	Achievement / maintenance of air quality	Use of chargers, increase in proportion of EVs in the	Public EV Charging in Crown Court	Funding, officer time for implementation

Waverley Borough Council

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
	<sup>23</sup> in Godalming through EV infrastructure improvements, including the uptake of EV taxis and buses.		infrastructure to promote LEVs		of AQAP	Waverley Borough Council						objective compliance	fleet in Farnham	carpark x 2CPs, The Burys x 3CPs, Cattesha Il Lane x 6CPs and Station Rd Farncombe x 4CPs	

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<sup>23</sup> it is important to note that EVs are not viewed as a solution to all transport-related health issues. While EVs have significant air quality benefits over conventional petrol and diesel fuelled vehicles, they still create air pollution in the form of small particulates from the wear on brake discs and tyres, which can be harmful to human health. Walking, cycling and travel by public transport remain essential to improving air quality as well as tackling congestion and encouraging physical activity. As such, EVs need to be considered as complementary to a wider sustainable transport approach.



Waverley Borough Council

Measure No.	Measure	Category	Classification	Estimated Year Measure to be Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Potential Barriers to Implementation
3	Consistent process for Air quality assessments for developments likely to impact on air quality, including committed development within and outside Waverley	Policy Guidance and Development Control	Planning Guidance	Ongoing	Ongoing	WBC and neighbouring authorities	Within existing budgets	No	n/a	Not explicitly costed as mainly staff time	Currently air quality assessments are requested, as well as mitigation where required. This measure will ensure consistency in the process	Long term targets for reduction in emissions in line with Defra targets	Number of planning applications reviewed and commented on	Ongoing	The process of assessment will ensure that cumulative impacts are incorporated where possible. Collaborative working across boroughs will take applications in neighbouring authorities into account

## Quantification of measures

The actions within this AQAP have been developed based on the best available evidence of what works in securing emissions reductions within the currently declared AQMAs. Actions being implemented across different timescales, alongside other policy processes at local, national and international levels mean that it is rarely possible to definitively attribute specific actions to outcomes, as outcomes are often driven by multiple and inter-related factors and can be difficult to measure with current datasets. As part of this AQAP, WBC are liaising with Surrey County Council and Farnham Town Council to ensure that the Farnham Infrastructure Programme is quantified in relation to its impact on air quality. There has been qualitative work undertaken on air quality effects of different packages of measures. It has been agreed that the impacts of the 'hybrid' option will be quantified, both within the town centre, and at other locations where increases in traffic may be significant.

Many of the other measures within the Clean Air Strategy cannot be easily quantified, as they are ongoing interventions to be implemented over a number of years, and it is difficult to know what the impact will be specifically in the AQMAs. The measures within the Strategy, although have not been specifically quantified, are designed to reduce emissions more widely than just the exceedance area.

It is judged that the measures included within this AQAP, as well as the more general measures within the Clean Air Strategy will ensure that compliance with the air quality objectives are maintained.

## Cost Effectiveness of AQAP Actions.

The Government does not expect authorities to undertake detailed cost-benefit analyses in their AQAPs. However, to provide an indication of cost effectiveness, the table below has been determined using best professional judgement to clearly set out impact (i.e., effectiveness) and cost in a qualitative way.

## Waverley Borough Council

Measure No.	Measure	Impact	Cost	Lead Authority (Service Area)
1	Farnham Infrastructure Programme: Town Centre Changes	Potentially <b>medium</b> to <b>high</b> depending on what is implemented	Depends on which option is taken forward	Surrey County Council, Farnham Town Council, Waverley Borough Council
2	Farnham Infrastructure Programme: Implementing outcomes of 'quick wins' project	<b>Low</b>	£50k - £100k	Surrey County Council, Farnham Town Council, Waverley Borough Council
3	Farnham Town Centre Local Cycling and Walking Infrastructure Plan (LCWIP)	Potentially <b>low</b> to <b>medium</b> depending on what is implemented	Dependant on what will be adopted – funding to be bid for	Surrey County Council, Farnham Town Council, Waverley Borough Council
4	Encouragement of Electric Vehicles in Farnham through EV infrastructure improvements, including the uptake of EV taxis and buses.	<b>Medium</b>	£100 - £500K	Surrey County Council, Farnham Town Council, Waverley Borough Council
5	Consistent process for Air quality assessments for developments likely to impact on air quality, including committed development within and outside Waverley	Potentially <b>Medium</b> to <b>high</b> in the longer term	Not explicitly costed as mainly staff time	WBC and neighbouring authorities
6	Waverley Clean Air Strategy	<b>Low</b> to <b>medium</b> within AQMAs	£10k - £50k	Waverley Borough Council with partners, SCC, Parish Councils, etc

**Impact:** *Low* – would reduce emissions, but not measurable by air quality monitoring and would be termed 'negligible' using industry standard guidance for modelling the impacts of developments; *Medium* - a change could be detected using an air quality model such as the NMF, but unlikely to be measurable by air quality monitoring; *High* – a change could potentially be monitored using standard monitoring techniques. It should be noted that the impact is based on NO<sub>2</sub>, not PM<sub>2.5</sub>.

**Cost:** Select from < £10k/£10k - £50k/£50k - £100k/£100k - £500k/£500k - £1m/£1m - £10m/ > £10m (aligned with ASR categories for reporting)

## Appendix A: Response to Consultation

A summary of the consultation responses (both through an online questionnaire and direct responses to the Council) are included in an appended document highlighting the consultation responses (to both Clean Air Strategy and Action Plan), and changes made in each of the documents, or actions taken.



# Waverley AQAP and Clean Air Strategy: Review of Consultation Responses

February 2023



Experts in air quality  
management & assessment

## Document Control

<b>Client</b>	Waverley Borough Council	<b>Principal Contact</b>	Jeanette Guy
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<b>Report Prepared By:</b>	Dr Clare Beattie
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### Document Status and Review Schedule

Report No.	Date	Status	Reviewed by
J10-13198A-10A/3/F2	22 February 2023	Final	Penny Wilson (Associate Director)

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## 1 Introduction

- 1.1 Consultation was undertaken by Waverley Borough Council on two documents, the Air Quality Action Plan and the Clean Air Strategy, between 5<sup>th</sup> December 2022 and 15<sup>th</sup> January 2023. The consultation process consisted of a range of engagement including emails directed to the Air Quality Steering group, all Waverley Borough Council (WBC) councillors, town and parish clerks and councillors, schools, GP surgeries and statutory consultees (Surrey County Council, neighbouring authorities, National Highways, Environment Agency and Chamber of Commerce). This short note provides an overview of consultation responses, WBC's response to points raised, and summarises where changes will be made in both documents.
- 1.2 There were 17 responses in total; 8 responses to the online questionnaire, 1 response through the website, and 8 by email. Seven of the questionnaire responses were from residents, and one from a neighbouring authority. The website and email responses were received from members of the public, neighbouring authorities, WBC councillors and Parish Councillors. In addition, the Overview and Scrutiny Committee were consulted at a meeting, and the outcomes of this have also been added to the list of consultation comments.

## 2 Summary of Responses

- 2.1 The following themes have been extracted from the consultation responses (amalgamating all responses from online questionnaire, those received directly by email, through the website, or from the Overview and Scrutiny Committee). Responses to the themes have been provided below and actions further summarised in section 3 of this note. The consultation responses themselves are summarised in Appendices A1 and A2.

### **Concern about increases in emissions from the level crossing on Station Hill and specifically anti-idling issues**

- 2.2 Concerns are noted. Actions are proposed in the Clean Air Strategy, under WBC commitment B7 (which has been widened out to include all level crossings) '*We will work with SCC to tackle vehicle idling emissions at key locations such as on Station Hill in Farnham, other level crossings and outside schools*'. Additionally, we will engage with Network Rail to see if there are any actions they can take regarding the level crossing.

### **The need to incentivise public transport (to make it low cost, reliable and low emission).**

- 2.3 It is agreed that this is a key priority, but one for which Waverley Borough Council will need to work with Surrey County Council to take forward. There is a commitment within the Clean Air Strategy (CAS), under C1 to work with Surrey County Council (SCC) on delivering LTP4 which includes improvements to public transport.

### **Include Park and Ride in the AQAP (for example consideration of two-way facility at Artington site)**

- 2.4 It is considered that the centres of Farnham and Godalming are not large enough to sustain their own Park and Ride facilities. Also, the cost of setting up a new Park and Ride service, even from an existing Guildford Borough Council site, is not considered a proportionate response to the existing air quality issues within Waverley. The idea has, however, been discussed with Surrey County Council, and will be considered in the future if appropriate.

### **Comments Regarding Planning System, including cumulative impacts (and specifically the approval of Dunsfold Park)**

- 2.5 It is agreed that, particularly in the longer term, the planning system is critical to both maintain existing good air quality and improving air quality into the future. Air quality assessments for new developments are reviewed and as part of that process, WBC ensures that the cumulative impact with other planned development, within and outside the borough is taken into account. WBC plan to issue some good practice guidelines to developers to help inform their air quality assessments, under



proposed measure 5 in the AQAP (see AQAP Table 5.1). The Strategy cannot oppose specific developments, but does provide a process within which air quality can be fully considered within the planning process.

### **The AQAP only addresses areas in Godalming and Farnham**

- 2.6 The AQAP is a statutory document which addresses any exceedances of the statutory air quality objectives within Air Quality Management Areas, which are declared in Godalming and Farnham. This is a Defra requirement through the Environment Act 1995 and 2021. In order to address reductions in emissions more widely across the borough, which is agreed should be a priority, the Clean Air Strategy has been developed. The Clean Air Strategy incorporates a wider range of priority actions, including commitments for WBC, but also provides a framework within which others can act to improve air quality.

### **Timescales on commitments in Clean Air Strategy to be updated to be more explicit**

- 2.7 The Clean Air Strategy has been updated to incorporate this.

### **AQAP to include section on uncertainty (of monitoring)**

- 2.8 The AQAP has been updated to incorporate this.

### **Safety issues, particularly those around active travel (which will disincentivise people to walk and cycle), for example, making lighting better on unlit footpaths, ensuring on road cycle lanes are better segregated.**

- 2.9 It is agreed that safety is a key issue in the encouragement of active travel. SCC includes modal shift to active travel as a key policy within LTP4, with a key aim to provide a safe, attractive, accessible and connected network. Delivery will largely be through the Local Cycling and Walking Infrastructure Plan (LCWIP) process. The specific feedback received within this consultation has been discussed with Surrey County Council.

### **Increase Air Quality Monitoring**

- 2.10 Air quality is monitored across the borough, at locations which reflect relevant exposure to pollutants (i.e., where members of the public are exposed over the time period of the objective), where the risk of air quality objectives being exceeded is highest. This approach is in line with current technical guidance issued by Defra. Although the number of monitoring locations could increase, this needs to be balanced with resourcing and at present it is considered that the current monitoring strategy is fit for purpose and is proportionate to air quality issues within Waverley. A review of monitoring locations was undertaken in 2019 and in some cases, monitoring sites relocated.

### **Technology will solve air quality issues, so no need for either document, or more measures**

- 2.11 Health effects are apparent even below current air quality objectives. Although technology will improve air quality into the future, the Council want to go further. The Council's strategic objectives for improving the health and wellbeing of its residents and communities is supported by the AQAP and Clean Air Strategy.

### **Farnborough Airport should be included**

- 2.12 It is recognised that locally there is concern about emissions from Farnborough Airport. However, from an air quality perspective, it is unlikely that the numbers of flights will pose a significant source of NOx emissions from aircraft. Government technical guidance on the consideration of airports provides a criteria of above 10 million passengers per annum (or equivalent freight also given) before an airport is required to be included in the local air quality management process. The airport is outside of WBC's area, but WBC will continue to work with neighbouring authorities on issues which will be of relevance to air quality.

### **Traffic light phasing (specifically in Godalming)**

- 2.13 This specific point has been passed onto Surrey County Council.

### **Parked cars on Eashing Lane and Ockford Road (increasing emissions by increasing stop start traffic)**

- 2.14 This specific point has been passed onto Surrey County Council parking team.

### **Need to have higher priority regarding bonfires**

- 2.15 Bonfires are included within the CAS with a commitment to encourage people not to have bonfires, through awareness campaigns. In the longer-term bylaws will be investigated to tackle this issue. Currently, there is no legislation available to ban bonfires as long as they take place within certain rules. Retrospectively where they cause nuisance, the Council can take action.

### **Need to make electric vehicles more affordable/ provide subsidies for renewable energy**

- 2.16 It is agreed that people are more likely to switch to more renewable energy and vehicles where subsidies or grants are provided. However, this is not an action that can be undertaken at local level within current resources. WBC and SCC are putting resources into developing the EV charging infrastructure in Waverley.

## **The AQAP should detail specific actions to be taken as part of the Farnham Infrastructure Plan**

- 2.17 More specific information on actions to be taken would be welcomed. The Council has contacted Surrey County Council for more information. However, it is recognised the plan is currently under development. The Council will continue to engage with Surrey County Council and it has been agreed that the 'hybrid option' put forward to the Farnham Infrastructure Programme Board will be quantified in terms of air quality impacts, which will add to the evidence base for decision making.

## **Future Air Quality may get worse**

- 2.18 We will continue to monitor air quality in Farnham to check if levels start to increase. Notably, roadside concentrations of nitrogen dioxide have been decreasing and are predicted to decrease further given national policies on tighter vehicle emissions and the move to adopt EVs.

## **Source apportionment shows exceedances**

- 2.19 The modelling study presented in the AQAP was undertaken for 2017 across Surrey. Source apportionment locations chosen were not necessarily relevant locations. They were chosen to try and identify the sources and relevant proportions of the sources to nitrogen dioxide pollution in that location. Further, the model was corrected to measured air quality Surrey wide. Unfortunately, this did not include any monitoring data in Waverley. Therefore, the monitored concentrations are a more robust reflection of concentrations than the modelled concentrations in 2017, which were included in the AQAP as the most recent analysis of sources (which will not have changed to the same degree).

## **Relevant locations and distance correction don't reflect concentrations**

- 2.20 Air quality objectives are only relevant where someone could be exposed over the averaging period, such as the façade of residential buildings for the annual air quality objective for nitrogen dioxide and pavement cafes for the hourly objective for nitrogen dioxide. Nitrogen dioxide diffusion tube monitoring locations were reviewed in 2019 to make sure they were at the facades of properties or representative of facades of properties and did not need to be distance corrected. There is no evidence that the hourly nitrogen dioxide objective is currently being exceeded at any location in Waverley. Monitoring is clearly explained and openly reported on an annual basis within the Annual Status Report.

## **Consultation arrangements aren't robust enough**

- 2.21 As outlined in paragraph 1.1 the consultation process consisted of a range of engagement including emails directed to the Air Quality Steering group, all Waverley Borough Council (WBC) councillors, town and parish clerks and councillors, schools, GP surgeries and statutory consultees (Surrey

County Council, neighbouring authorities, National Highways, Environment Agency and Chamber of Commerce).

### **Clean Air Strategy – 2 documents not required.**

- 2.22 The 2 documents are designed to complement each other. The draft AQAP has been produced as part of the council's statutory duties required to reduce nitrogen dioxide in the Farnham and Godalming Air Quality Management Areas. The draft CAS has a wider brief and aims to reduce nitrogen dioxide and fine particulates across the Borough to improve air quality. Further, if nitrogen dioxide concentrations do not exceed any air quality objectives over the next few years it might be appropriate to consider if the Council should revoke the Farnham (but only after the Farnham Infrastructure Plan changes have been implemented and monitored) and Godalming air quality management areas. If that happens the formal AQAP for Farnham and Godalming would cease to exist, but we will still have a plan in place to tackle air pollution in the Borough. This is a new requirement for Councils who do not have air quality action plans from 2023. However, we have developed a CAS now given the increasing awareness of the dangers posed by poor air quality and the council's strategic objectives for improving the health and wellbeing of its residents and communities.

### 3 Summary and Conclusions

- 3.1 Responses to the consultation were wide ranging in comment and topics covered. The questionnaire responses were not clear cut in terms of support or not for the documents, although the more substantive comments made by email or via the webpage suggested broad support for both documents.
- 3.2 A number of themes have been identified which are responded to in section 2 of this note.
- 3.3 The following changes to the documents have been undertaken, alongside some other minor changes to reflect discussions at the final Steering Group Meeting:
- Timescales on commitments in Clean Air Strategy to be updated to be more explicit;
  - AQAP to include section on uncertainty (in measurements); and
  - AQAP to include specific actions as part of the Farnham Infrastructure Plan, if possible.
- 3.4 The following issues have been discussed with Surrey County Council:
- Concern about increases emissions from the level crossing on Station Hill and specifically anti-idling issues. This includes ongoing discussions around the feasibility of having an electronic sign linked to the level crossing being closed.;
  - Safety issues, particularly those around active travel (disincentivising people to walk and cycle). For example, making lighting better on unlit footpaths, ensuring on road cycle lanes are better segregated;
  - The need to incentivise public transport (to make it low cost, reliable and low emission);
  - Park and Ride in the AQAP (at Artington site);
  - Traffic light phasing (specifically in Godalming);
  - Parked cars on Eashing Lane and Ockford Road (increasing emissions by increasing stop start traffic); and
  - The Farnham Infrastructure Plan.
- 3.5 Concerns about ant-idling by the level crossing on Station Hill will be raised with Network Rail.

## 4 Appendices

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## A1 Comments from Webpage and by Email

Date	From	Comments
9 Dec 22 (web page)	Member of public (CB)	Thank you for this initiative. I wonder if we could do something about the long wait at the level crossing where the fumes are terrible. We need a tunnel or a bridge! Or at least raising and lowering the barriers so that there is not such a long wait.
9 Jan 23 (email)	Member of public (H)	Amongst the recommendations for the public on how to reduce pollution is: switch off your engine while sitting in the traffic. Now, I have been doing that for a long time. I wonder though why the Government /company /utility and any other commercial vehicles (including ambulances) are not obliged to switch their engines off while idling? They ought to serve as an example to the private drivers. I have occasionally asked the idling drivers to do that, only to be told off and disregarded. Maybe a campaign like “stop pollution while idling your engine” along with fines for offending drivers could be included in the strategy?
16 Jan 23 (email)	Member of public (AS)	I am very supportive of improving air quality and the direction of WBC’s Air Quality Action Plan. I do however feel there is one significant strategic element missing; this is the need to urgently incentivise people to use public transport NOW instead of older petrol or diesel private cars and vans. Public transport needs to be low cost, frequent, reliable and low emission to encourage people out of private high emission vehicles. It will take many years to transition to majority EV vehicles and in the meantime low emission public transport needs to fill the gap. I therefore urge Waverley BC and Surrey CC, to phase out the old diesel buses and rapidly introduce low cost, more frequent, more reliable and low emission public buses on all routes across Surrey. Without this, air quality will not be seriously improved. At present for example a family travelling by bus from Womersh Parish to Guildford and back, will pay an order of magnitude higher cost for a service that is infrequent and unreliable, using old high emission buses, and instead will use their car for much lower cost and convenience. Changing this equation is the strategic element missing.
12 Jan 23 (email)	Pollution Team Leader East Hampshire DC	Thank you for consulting us on Waverley Borough Council’s Draft updated Air Quality Action Plan and Draft Clean Air Strategy. I have reviewed the documents and agree with the actions and strategies proposed to improve local air quality across Waverley.  Please do not hesitate to contact me if you require any further information.
17 Jan 23 (email)	Senior Specialist Environmental Protection, Guildford BC	The documents are logical and appear to show a clear direction.  Guildford Borough Council Regulatory Services would like to offer support to help achieve the objectives and actions outlined in the two draft documents above. Whilst it is appreciated that there are differences in the timescales of both authorities, we are predominantly facing road transport

		<p>related air quality problems on the same roads particularly with respect to the A281, A3100 and A3. In particular we intend to:</p> <ol style="list-style-type: none"> <li>1. Support any Waverley BC steering/ working groups with attendance by at least one officer.</li> <li>2. Reciprocate any arrangements re Guildford BC steering/ working groups to invite Waverley BC officers to attend as appropriate.</li> <li>3. Provide and share information on traffic surveys and consequent air quality modelling.</li> <li>4. Take opportunities to share resources and initiatives as appropriate.</li> <li>5. Comment and consult on planning applications that have cross border implications. I understand that the GBC Development Management Policies as part of the Local Plan Process will be in place in spring 2023, it includes a section on air quality.</li> <li>6. Support any joint sustainable travel options, whilst I cannot see any mention of Park and Ride. Is there any benefit in looking at the feasibility of a two way facility at the Artington site?</li> </ol>
2 Dec 22 (email)	Cllr Townsend (WBC)	<p>This looks great. Small thing but on the AQAP draft doc the table on the bottom of page 14 is split across the next page I think which makes it a bit difficult to read, perhaps consider moving on to P15, appreciate that moving this might affect other pages.</p>
8 Dec 22 (email)	Cllr Seaborne (WBC)	<p>I just went to look something up in the consultation versions of the Clean Air Strategy and the ACQP and although I was able to find the consultation through a search on the website the consultation does not appear in the Consultations part of the Waverley website, which was my first port of call:</p> <p><a href="https://www.waverley.gov.uk/Services/Council-information/Consultations-and-getting-involved">https://www.waverley.gov.uk/Services/Council-information/Consultations-and-getting-involved</a></p> <p>Would it not be appropriate to have a box on that page for either Environmental Consultations or Climate Emergency Consultations and with a subsequent link to the Clean Air Strategy and the AQAP, so that this consultation is accessed in the same way as many other recent consultations?</p> <p>Can I take this opportunity to say thanks for incorporating the points I made at the November board meeting into the strategy. I think the changes make for a more useable document.</p>
15 Jan 23	Cllr Hyman	<p>Main points as summarised:</p> <ul style="list-style-type: none"> <li>• Proposed SCC actions in Farnham have a lack of detail and funding;</li> <li>• Need to take cumulative impacts on air quality into account within planning;</li> <li>• Future Air Quality may get worse;</li> <li>• Source apportionment shows exceedances;</li> <li>• Relevant locations and distance correction don't reflect concentrations;</li> <li>• Consultation arrangements aren't robust enough; and</li> <li>• Clean Air Strategy – 2 documents not required.</li> </ul>



19 Dec 22 (email)	Cranleigh Parish Cll	Good Morning. The Parish Council discussed the draft Clean Air Strategy for Waverley at their Council meeting last week. The Parish Council would like to comment that they support air quality monitoring in Cranleigh.
12 Jan 23 (email)	Bramley Parish Cll	<p>Bramley Parish Council is supportive of Waverley's focus on clean air evidenced through the Clean Air Strategy. However, Bramley Parish Council does not regard Waverley's intent in this strategy as being consistent with their decision to authorise the largest ever new settlement in Waverley Borough at Dunsfold Park in a car-dependent location.</p> <p>Bramley already suffers significant pollution impacts from congestion along the A281. Waverley's decision to allow the Dunsfold Park development will significantly increase traffic, congestion and air quality issues regardless of the proposed traffic alleviation measures.</p> <p>The proposals in the Clean Air Strategy are welcome and supported but, for Bramley, their positive impact will be dwarfed by the negative consequences of Waverley's support for a new settlement, larger by far than Bramley itself, in a location that will force substantially increased lorry and car movements along an already congested and polluted road.</p> <p>If Waverley is serious about its Clean Air Strategy it will update the report to provide an assessment of the pollution impacts of the Dunsfold Park development and use that data to reconsider its support for such a large car-dependent development or at least demonstrate (if it can) how its support for Dunsfold Park will be consistent with that Clean Air Strategy.</p> <p>Additionally, Bramley Parish Council would also point out that the Waverley Air Quality Action Plan only addresses areas in Guildford and Farnham. We appreciate that this has been constructed in a standard format for submission to the government but would suggest that the tabulated material in the Strategy Document is largely the action plan for the rest of the borough. We think that there should be one high level strategy and one detailed plan covering the entire borough and not just the two Air Quality Action areas. By doing that all actions will end up in the same format, and the plan will be a true Waverley AQAP and not just one for Farnham and Godalming.</p> <p>I would be grateful if you would take Bramley Parish Council's comments into consideration.</p>
9 Jan 23 (meeting)	WBC Overview and Scrutiny	<p>Actions required:</p> <ul style="list-style-type: none"> <li>• A target date be included on each commitment rather than 'short, medium and long term'. This will allow the Services O&amp;S and Executive to monitor progress.</li> <li>• Annual update to be presented to Services O&amp;S to allow monitoring of the progress of each of the commitments.</li> <li>• AQAP to include how to quantify the uncertainty and ways to deal with this.</li> <li>• Obtain information from Public Health on level of illnesses caused by pollution split down into ward level.</li> </ul>

		<ul style="list-style-type: none"><li>• Communications Strategy to be developed to raise public awareness and provide educational tools.</li></ul>
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## A2 Overview of Questionnaire Responses

A2.1 In response to the question 'Do you agree with the measures within the draft updated Actin Plan to improve air quality within the AQMAs', 2 responded yes, 3, no and 3 not sure. Reasoning for the response included:

- The air quality in Farnham town and by the station is noticeably poor. The first step should be the infrastructure to allow people to travel safely without having to use their cars. Further monitoring stations would be helpful to ascertain where air pollution is improving or declining. I'm not clear how raising the monitoring station in the Borough will give an accurate result of the air pollution at ground level. My children would ride to school if there was a safe route and the school had anywhere to keep their bikes;
- Unclear what specific actions are being proposed;
- Technology is changing constantly, and there is simply no need to take these measures at the cost of business, liberty and freedoms; and
- Comprehensive list of measures proposed in line with options that are available to improve air quality.

A2.2 In terms of further targeted measures, 3 respondents provided suggestions:

- You have not included the air pollution caused by low flying jets in and out of Farnborough Airport. There is a significant increase in overflying and the area above Farnham was described the 'motorway in the sky' by the company. There needs to be consideration and accountability for this in the plan given that the council agreed to it in 2014 and Waverley have not held FACC to account whilst declaring a Climate Emergency themselves;
- Encouraging people to walk and cycle from nearby villages. Make cycling safer by having separate cycle lanes from motor traffic. Encouraging children to cycle to school. Greater school bus provision or park and ride. I regularly see long queues of traffic outside Waverly Abbey which has a large carbon footprint as well as a waste of time; and
- In Godalming there is a lot of traffic build up from Squires garden centre, Eashing lane through to Waitrose. The traffic lights and inappropriate parking. The traffic lights sit at red when nobody is crossing the road outside Waitrose. This holds up the traffic for no reason at all, leads to a build up of traffic and therefore increased emissions. The same situation occurs at the other end of the Godalming inner relief road at the traffic lights near the Richmond arms. The traffic lights should turn red when an individual pushes the button on the pedestrian crossing, not have a timed system. Inappropriate parking contributes to increased emissions. cars park on the pavement at the bottom of the Eashing lane, and on the corner of bend between Cliff Rise and Eashing lane. Again, cars have to slow down to get round this hazard, and this in turn increases emissions. Double yellow lines are needed at the bottom of Eashing

lane and on the corner of bends. This is always a problem due to the road narrowing and residents parking anywhere. On Ockford road the parking space needs to be shortened slightly because when cars park in the last space nearest the Inn on the lake roundabout it slows traffic because half the carriage way is taken up with a parked car. This slows traffic as cars have to be careful going past as they have to cross the white line in the middle of the road. The slowing of the traffic also adds to emissions.

A2.3 In response to the question 'Do you agree with priority actions in the draft strategy', 2 responded yes, 3, no and 2 not sure. Reasoning for the response included:

- There is no page 25. Bonfire reduction should be more urgent. Waverley offer more take away of garden waste to reduce bonfires. This can then be composted.

A2.4 In terms of other priority actions, 2 respondents provided suggestions:

- As described earlier...Increase Monitoring. Provide better infrastructure. Hold Farnborough Airport accountable for its emissions; and
- Cycle lanes need to be more than painted lines on pavements, they need to be separate tarmac lanes where possible. Off road paths will only suit a small amount of bike riders and are no good when it rains.

A2.5 1 respondent had suggestions regarding the Councils commitments for actions:

- It is good that they are addressing the problem, but action needs to happen. Simple things like altering phasing of traffic lights can be a big help.

A2.6 When asked how important they thought improving air quality is, 2 were neutral, 2 thought it was important, 3 responded very important, and 1 not important (who followed up with the comment 'Air is improving along with technology, it should not be a priority').

A2.7 When asked 'Would you be prepared to make any lifestyle changes to improve air quality within Waverley, 4 responded:

- Upgrade to a low emission vehicle such as electric; Only burn dry well seasoned wood or smokeless fuel at home; Reduce what I burn at home; Cycle more often for short journeys; Walk more often for short journeys; Change how I heat my home to a renewable option;
- Walk more often for short journeys; Cycle more often for short journeys; Use public transport more often; Upgrade to a low emission vehicle such as electric; Walk or cycle for school journeys; Change how I heat my home to a renewable option;
- Cycle more often for short journeys; Use public transport more often; Change how I heat my home to a renewable option; and

- Walk more often for short journeys; Cycle more often for short journeys; Change how I heat my home to a renewable option; Upgrade to a low emission vehicle such as electric.

A2.8 In terms of what would help to make these changes easier for you, the following responses were received.

- Dedicated cycling facilities;
- Subsidies for renewable energy. I think if communities felt Waverley were willing to take on the big polluters they would feel more incentivised to change themselves;
- More accessible and regular public transport. Better cycle lanes separate from traffic; and
- Having good quality street lights on footpaths that have none. Cutting back trees that cover street lights so they are effective! Not shrouded in branches and leaves e.g. the road from Milford, past the golf course and up to the station. Not taking away grants for electric vehicles, this means they will only be bought by the rich who can afford them.

A2.9 2 respondents felt they were more affected by air pollution than others, 1 with young children, the other with respiratory illness.

# Appendix B: Reasons for Not Pursuing Action Plan Measures

Table B.1 – Action Plan Measures Not Pursued and the Reasons for that Decision

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
No action specifically discounted		

## Appendix C: Clean Air Strategy

# Clean Air Strategy for Waverley (Draft)

February 2023





## Foreword

Foreword from the Portfolio Holder

*A message to everyone living and working in Waverley, including Town and Parish Councils, Businesses, Schools, other organisations, the medical profession and the public*

There is growing evidence that air pollution, even when experienced at very low levels, is damaging to human health. This led the World Health Organisation to recently revise its guideline for what it considers a safe level of exposure of particulate pollution, bringing most of the world (97.3% of the global population) into the unsafe zone.

The government provides parameters for an area to be designated an air quality management area. There are two in Waverley: one in Farnham Town Centre and one along Ockford Road in Godalming, both due to traffic emissions causing elevated levels of nitrogen dioxide. An action plan has been updated for these specific areas to secure and maintain air quality below the annual objective for nitrogen dioxide.

However, in light of the increasing awareness of the dangers posed by poor air quality at levels significantly below the levels set by the UK government, the council wants to do more. Accordingly, we are adopting this Clean Air Strategy to encourage actions to improve air quality across the borough, reducing levels of fine particulates and nitrogen dioxide. This is consistent with the Council's strategic objectives for improving the health and wellbeing of our residents and communities, taking action on the Climate Emergency and protecting the environment.

Everyone has an interest in the quality of the air we breathe. By acting together to reduce emissions of nitrogen dioxide and fine particulates we can improve air quality. This strategy sets out our key priorities and actions we propose to take. We encourage others to follow our example and consider what actions they can take to improve air quality.

With best wishes

[Signature]

Steve Williams, Portfolio Holder for Environment & Sustainability

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## Document Control

Version	Version Status (Draft, Approved /Published Internally or Externally)	Date	Version Comment
Version 1.0	Draft for Special Emergency Climate Board	4/11/22	Draft for discussion
Version 1.1	Draft - incorporates comments from Special Emergency Climate Board	10/11/22	Draft for Executive Briefing
Version 1.2	Draft – incorporates feedback from internal stakeholders	24/11/22	Draft for public consultation
Version 1.3	Draft – incorporates feedback from public consultation	09/02/23	Draft for internal approval

# 1 Introduction

- 1.1 Air pollution has been linked with several long-term health conditions, including cancer, asthma, heart disease, obesity and changes linked to dementia. Additionally, air pollution particularly affects the most vulnerable in society: children and older people. There is also often a strong correlation with equalities issues because areas with poor air quality are also often the less affluent areas.
- 1.2 The Council has statutory responsibilities for air quality, governed by Part IV of the Environment Act 1995 and Part 4 of the Environment Act 2021. The legislation places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether the UK air quality objectives are likely to be achieved. Councils are required to produce an Annual Status Report (ASR) which provides an annual update on monitoring data; measures to improve air quality; newly identified issues; and progress made is submitted to Defra for approval. Where air quality objectives are not met, and an Air Quality Management Area is declared, an Air Quality Action Plan is a further requirement which also needs submission to Defra. This Strategy will provide a mechanism for reducing emissions further than our statutory requirements, whilst supporting measures highlighted in the ASR, and will outline how we plan to effectively tackle air quality issues across the borough.

## 2 Aims and Objectives of the Air Quality Strategy

2.1 The vision of the Waverley Corporate Strategy<sup>1</sup> is that Waverley will be environmentally, economically and financially sustainable with healthy, inclusive communities and housing available for all who need it. This includes strategic priorities as follows:

- Local, open, participative government
- Supporting a strong, resilient local economy
- Taking action on Climate Emergency and protecting the environment
- Good quality housing for all income levels and age groups
- Effective strategic planning and development management to meet the needs of our communities
- Improving the health and wellbeing of our residents and communities

2.2 In light of the strategic priorities of the Council, this strategy has the overarching **aim to maintain and improve air quality across the Borough**. In working towards this aim, the following objectives have been set:

- To demonstrate leadership in improving air quality
- To work collaboratively with partners to improve air quality within the Borough
- To support and enable behaviour change to improve air quality directly.

2.3 Actions to achieve these aims are outlined in sections 5 and 6.

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<sup>1</sup> Available at <https://www.waverley.gov.uk/Services/Council-information/About-Waverley-Borough-Council/Corporate-Strategy-2020-25>

## 3 Air Quality Context

### What are the main pollutants of concern?

- 3.1 The main pollutants of concern are nitrogen dioxide and particulate matter (small dust particles made up of a variety of different chemicals and metals). Each has different sources, health effects and chemical behaviours.

### What is nitrogen dioxide (NO<sub>2</sub>)?

- 3.2 Nitrogen dioxide (NO<sub>2</sub>) is a gas produced as a result of fossil fuel combustion processes. Its presence in air contributes to the formation and modification of other air pollutants, such as ozone and particulate matter, both of which are also harmful to health. Breathing air with a high concentration of NO<sub>2</sub> can irritate the airways in the lungs.

### What is Particulate Matter?

- 3.3 Particulate matter is the most important air pollutant in terms of health effects and is different from the gaseous pollutants in that it is not a clearly defined chemical compound. It is a mixture of small particles which are usually described by their size. PM<sub>10</sub> are particles below 10 micrometres in diameter and PM<sub>2.5</sub> are below 2.5 micrometres (approximately 30 times smaller than the width of a human hair). The larger particles can penetrate into the upper airways, while PM<sub>2.5</sub> can penetrate deeper into the lungs. Both groups contain much smaller particles which are much more numerous and can penetrate all areas of the lungs and even pass into the bloodstream or brain.

### What are the health effects of air pollution?

- 3.4 There is ever-growing evidence for the connections between air pollution and heart and lung health and the link to premature mortality, with connections also being made to other conditions such as diabetes, dementia, mental health and birth outcomes, and more recently potential links to Covid-19.
- 3.5 Some of the effects occur over a short period, from minutes to days, whereas others result from long term exposure. Air pollution is known to cause some conditions, and also exacerbate existing conditions, such as triggering an asthma attack. These short- and long-term health effects are reflected in the air quality objectives, which have both short- and long-term averaging times for pollution measurements.
- 3.6 While the majority of the published evidence relates to the long-term impacts of fine particulate matter (PM<sub>2.5</sub>), evidence is also strengthening for the health impacts of nitrogen dioxide (NO<sub>2</sub>), mainly around pulmonary and cardiovascular effects and the link to premature mortality.
- 3.7 It is generally accepted that air pollution can be harmful to anyone. However, some people are more likely to suffer than others because they live in deprived areas, which often have higher

levels of air pollution; they live, learn or work near busy roads; and/or are more susceptible because of their age or existing medical conditions. Therefore, groups that can be considered vulnerable include, but are not limited to, the old, the young, deprived communities and those with existing health conditions.

- 3.8 Further information on the health effects of air pollution can be found [here](#).

### **What is Air Quality like in Waverley?**

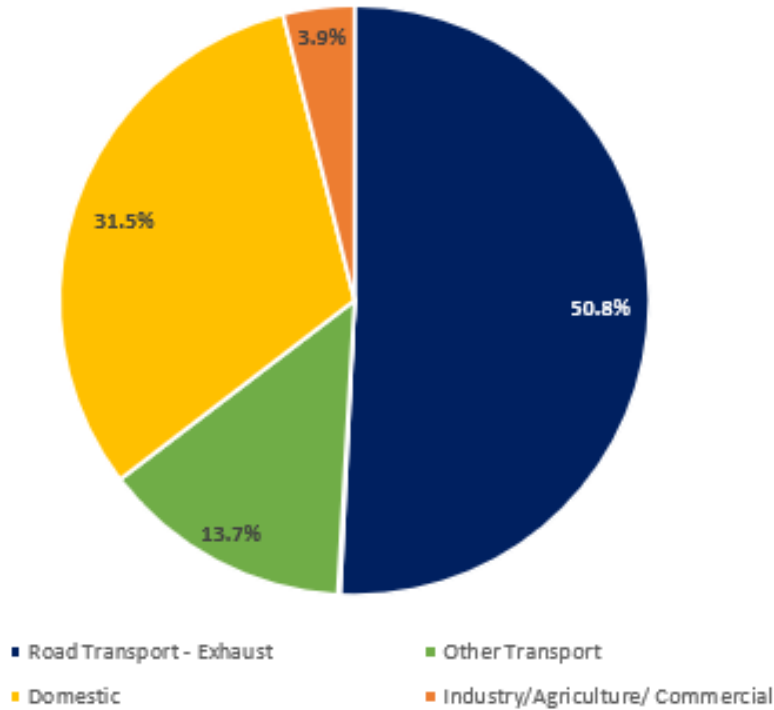
- 3.9 Air Quality in Waverley is generally good. There are currently two small areas with historical exceedances of an air quality objective in Godalming and Farnham. These areas are designated Air Quality Management Areas (AQMAs) and have been declared for exceedances of the annual mean nitrogen dioxide objective. In Godalming, there was a marginal exceedance just outside the AQMA on Ockford Road in 2019. Since 2019, concentrations at this site have been well below the objective.
- 3.10 In Farnham, the exceedance is restricted to one monitoring site which is located on The Borough, in 2019. However, the site is at ground floor level, with relevant exposure<sup>2</sup> in flats above the shops. A monitoring site has been situated higher up the building to represent relevant exposure and concentrations have been below the objective in both 2019 and 2021 (with no data available for 2020). Although the exceedances are marginal in 2019, actions to improve air quality at these locations are set out in an Air Quality Action Plan, which has been developed alongside this Strategy, which is in line with Waverley Borough Council's (WBCs) statutory requirements (see section 4).
- 3.11 It should be noted that although a monitoring site on Upper Hale Road in Farnham is currently measuring concentrations marginally higher than The Borough, this is below relevant air quality objectives.
- 3.12 Waverley Borough Council's Annual Status Reports can be found at <https://www.waverley.gov.uk/Services/Environmental-concerns/Pollution-control/Air-quality/Air-quality-reports>.

### **What are the main sources of pollutants in Waverley?**

- 3.13 NO<sub>2</sub> is both a primary and a secondary pollutant. In other words, it is both emitted directly from polluting sources and is also formed from chemical reactions of pollutants in the atmosphere. Nitrogen oxides (NO<sub>x</sub> – a combination of NO and NO<sub>2</sub>) is produced when fossil fuels (coal, natural gas and so on) are burned. Road transport is the largest source of NO<sub>x</sub> overall in Waverley as shown in Figure 1.

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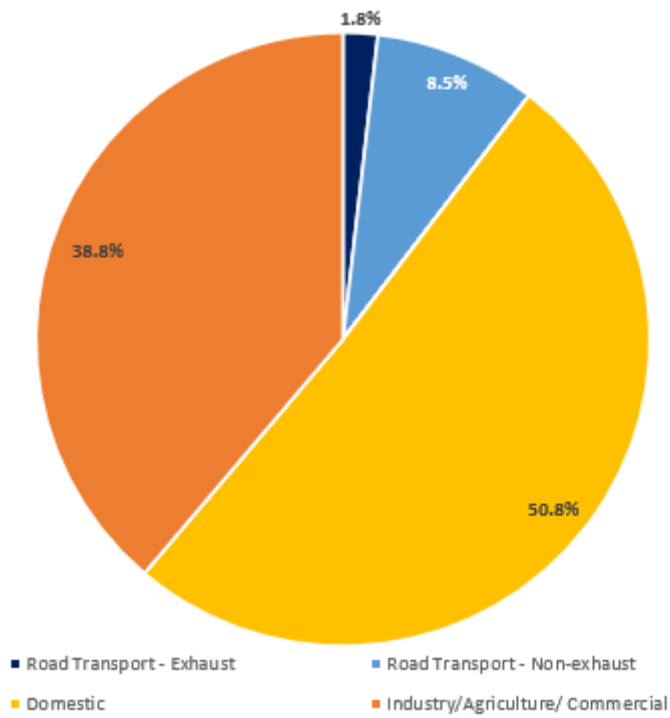
<sup>2</sup> Air Quality Objectives only apply where members of the population are exposed for the time period over which the objective is measured, in this case over the period of a year, which is generally taken as the facades of residential properties, schools, hospitals etc.



**Figure 1: Average Background Annual Mean NOx Contribution in Waverley ( $\mu\text{g}/\text{m}^3$ )**

3.14 Particulate matter is a mixture of both primary and secondary components, which contains those which are either human-made or naturally occurring. Sources of primary particles include combustion processes, such as diesel engines and woodburning, but can also include mechanically derived particles such as tyre, brake and road wear, windblown dusts (including, for example, dust from the Sahara) and sea salt. Mechanically derived particles tend to be larger in size ( $\text{PM}_{10}$ ) whereas combustion derived particles are smaller ( $\text{PM}_{2.5}$ ). Fine particles and, in particular, secondary particles<sup>3</sup> can travel long distances and are known as transboundary pollutants. This means that the particles measured in Waverley, often originate from emissions far beyond their boundary. Figure 2 shows the origins of primary  $\text{PM}_{2.5}$  (as an average) across Waverley.

<sup>3</sup> Secondary particles occur due to chemical reactions in the atmosphere generally downwind some distance from the original emission source



**Figure 2: Average Background Primary Annual Mean PM<sub>2.5</sub> Contribution in Waverley (µg/m<sup>3</sup>)**



## 4 Policy Context

### Air Quality: the Role of Local Authorities

- 4.1 The [UK Air Quality Strategy](#) (AQS), released in July 2007, provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the Government to protect human health. The AQS provides the framework for local authorities to implement Local Air Quality Management (LAQM), which includes annual reviews of air quality, and measures being implemented at local level to improve Air Quality Management Areas, which are then reported to the Government. The Defra [Clean Air Strategy 2019](#) sets out a wide range of actions by which the UK Government will seek to reduce pollutant emissions and improve air quality. Actions are targeted at four main sources of emissions: Transport, Domestic, Farming and Industry. The AQS is due to be updated by Government in 2023.
- 4.2 Measures to improve air quality are being implemented by all levels of Government. Waverley has a corporate priority to improve the health and wellbeing of our residents and communities, and to take action on the Climate Emergency and protect the environment. In Waverley, projects such as those delivered under Surrey's Local Transport Plan (LTP4), will be key to the way people travel in the future. An increase in active travel will be required to achieve commitments in relation to net zero. Additionally, where developments are located, and how sites are developed, will also be fundamental to travel patterns in the future, as well as affecting population exposure to air pollutants. This Clean Air Strategy for Waverley complements these overarching aims, but also provides a wider set of measures tackling other sources of pollution. Other measures underway include those to reduce building emissions, for example through projects to reduce greenhouse gas emissions, and education and awareness to reduce solid fuel burning, especially where it is not the primary source of heating. These local measures implemented by the borough are underpinned by work being undertaken at national and international level, such as the reductions in emissions from vehicles through increasing Euro standards and the move away from internal combustion engine vehicles. All of these measures being implemented at different levels of government have the overall aim to improve health.
- 4.3 The UK's new legal framework for protection of the natural environment, the [Environment Act 2021](#) gives the Government the power to set long-term, legally binding environmental targets. It also establishes an Office for Environmental Protection (OEP), responsible for holding the government to account and ensuring compliance with these targets. The Act requires the Government to set at least one long-term target (spanning a minimum of 15 years), supported by interim targets set in a five year cycle, in each of four identified areas: Air Quality, Biodiversity, Water and Resource Efficiency and Waste Reduction. An additional target for mean levels of PM<sub>2.5</sub> is also required. The Government has recently published a draft Statutory Instrument to set two new targets for future concentrations of PM<sub>2.5</sub>, but this has not yet been

approved by parliament. One target will be to achieve PM<sub>2.5</sub> concentration of 10 µg/m<sup>3</sup> by 2040. This will be accompanied by a second target to reduce overall population exposure to PM<sub>2.5</sub>, which will be assessed by national government using its own measurements. Defra recognises that the nature of PM<sub>2.5</sub> concentrations, which are dominated by the long-range transport of emissions, means that only coordinated national-level action can allow the targets to be achieved. As such, the targets will provide metrics against which central Government can assess its own progress. There is no expectation that individual local authorities will use them to assess compliance, or that they will be used explicitly within development-control decisions. Defra's focus for local authorities is on reducing emissions which will help to drive national-level improvements, rather than addressing PM<sub>2.5</sub> concentrations in their own area. Similarly, in terms of planning decisions, it is most sensible to focus on optimising development to reduce emissions and exposure. The Act also provides a legal framework for greater collaboration with '*Air Quality Partners*'. As a result, responsibility for tackling local air pollution will now be shared with public authorities identified as responsible for any sources of exceedance; all tiers of local government, neighbouring authorities, Environment Agency, National Highways etc.

### **WHO Guidelines**

- 4.4 The World Health Organization (WHO) published a revised set of guidelines in 2021 for PM<sub>2.5</sub>, PM<sub>10</sub>, ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>), sulphur dioxide (SO<sub>2</sub>) and carbon monoxide (CO). They update the previous guidelines issued in 2005 and are based on a review of evidence on the effects of air pollution on health, drawn from the last 16 years and more. The guidelines are not legally binding but they "provide WHO Member States with an evidence-informed tool that they can use to inform legislation and policy". Currently, the UK Air Quality Objectives remain unchanged. WHO does not intend that Governments and policy makers simply adopt the Guidelines into legislation. However, the Environment Act 2021 requires that the Government set a new target for PM<sub>2.5</sub> and that it has regard to the WHO Air Quality Guidelines while doing so. The new targets have been consulted on, but not yet adopted.

### **Surrey Context**

#### **Public Health**

- 4.5 Local authorities have a range of powers which can effectively help to improve air quality. However, the involvement of public health officials is crucial in playing a role to assess the public health impacts and providing advice and guidance on taking appropriate action to reduce exposure and improve health. Mounting scientific evidence shows the scale of the impact of poor ambient air quality on health. Evidence suggests interventions aiming to reduce

population exposure to pollution will have the biggest overall health impact, although action also needs to be taken to reduce inequalities in exposure and to protect vulnerable groups<sup>4</sup>.

### ***Local Transport Plan***

- 4.6 Surrey County Council (SCC) is in the process of updating its Local Transport Plan, which sets out the changes required to achieve net zero emissions by 2050. SCC are committed to significantly transforming transport networks to meet this national target and LTP4 sets out measures to increase active travel and personal mobility, promote public and shared transport, promote zero emission vehicles and incorporate the principles of planning for place.

## **Waverley Context**

### ***Local Plan***

- 4.7 The Local Plan Part 1: Strategic Policies and Sites (LPP1) sets out the Council's spatial framework for delivering the development and change needed to realise the vision for development in Waverley up to 2032 and is already adopted. Local Plan Part 2 (LPP2) will form the second stage of Waverley's new Local Plan. Together with LPP1 this document will replace the 2002 Local Plan. LPP2 will provide the more detailed policies, and will allocate sites needed for housing or other uses in certain areas of Waverley. Where development is located, will affect travel patterns and hence air quality, as well as directly contributing to emissions through the buildings themselves.

### ***Air Quality Action Plan***

- 4.8 The currently adopted action plan was adopted in 2008 and contained specific actions for the (then) three AQMAs. In relation to Farnham, the town centre package, as outlined in the Farnham Review Study, was supported. In relation to Godalming, work to update the existing urban traffic control (UTC) system was highlighted, in order to reduce congestion and improve air quality. Other wider measures were also included in the plan, such as the Waverley Corporate Travel Plan, behaviour change campaigns and school travel plans. The measures have been updated through the Annual Status Reporting process, which contain detailed information on measures which have been implemented or are planned. In parallel with this Clean Air Strategy, the Air Quality Action Plan is also being updated, and will cover WBC's statutory responsibilities in terms of achieving the UK air quality objectives.

### ***Local Air Quality Management***

- 4.9 WBC is currently meeting all of the national air quality objectives, but has had some exceedances of the Nitrogen Dioxide (NO<sub>2</sub>) annual mean objective up to 2019. Waverley Borough Council is meeting the current objectives for Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>).

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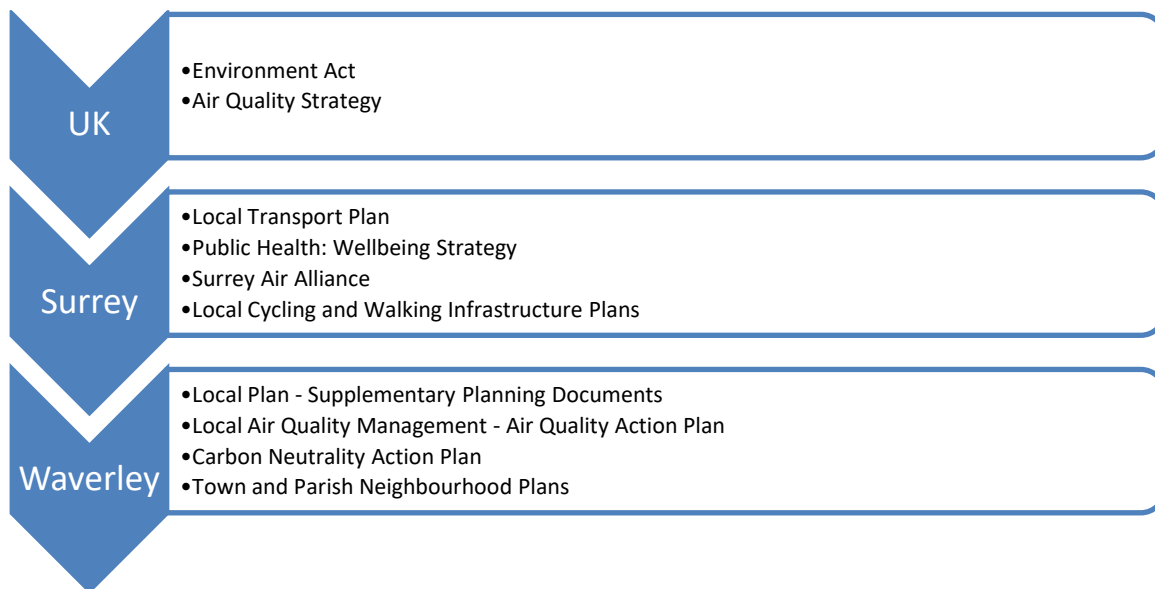
<sup>4</sup> Available at <https://www.gov.uk/government/publications/improving-outdoor-air-quality-and-health-review-of-interventions>

Both pollutants are potentially damaging to health at levels below the air quality objectives, and both pollutants are therefore included within this Strategy.

4.10 In order to support the local air quality management process, WBC are currently monitoring nitrogen dioxide at over 50 sites across the borough. This is mainly using diffusion tubes, which provide a monthly reading, however, there are also automatic sites for both NO<sub>2</sub> (one in Farnham and one in Godalming) and PM<sub>10</sub>, (one in Farnham) which provide hourly readings. In 2018, an extensive review of the air quality monitoring network in the Borough was undertaken and a monitoring strategy developed to ensure monitoring locations are representative of relevant public exposure and in 'worst case' locations. The new monitoring strategy was implemented in January 2019, with a few amendments made in January 2020.

4.11 The Environment Act 2021 will result in additional targets for PM<sub>2.5</sub> and a new role for local authorities, although the targets themselves are unlikely to be for local authority compliance. There is also a new requirement for local authorities without AQMAs to produce an Air Quality Strategy in order to reduce emissions of pollutants within their local areas. The prominence of PM<sub>2.5</sub> is therefore likely to increase within the LAQM process, and this Strategy provides a mechanism by which WBC can demonstrate actions to reduce emissions more widely than just in the AQMAs, including those for PM<sub>2.5</sub>.

4.12 Figure 3 outlines the main policy context within which this Strategy sits.



**Figure 3: Summary of Relevant Policy and Wider Context of the Strategy**

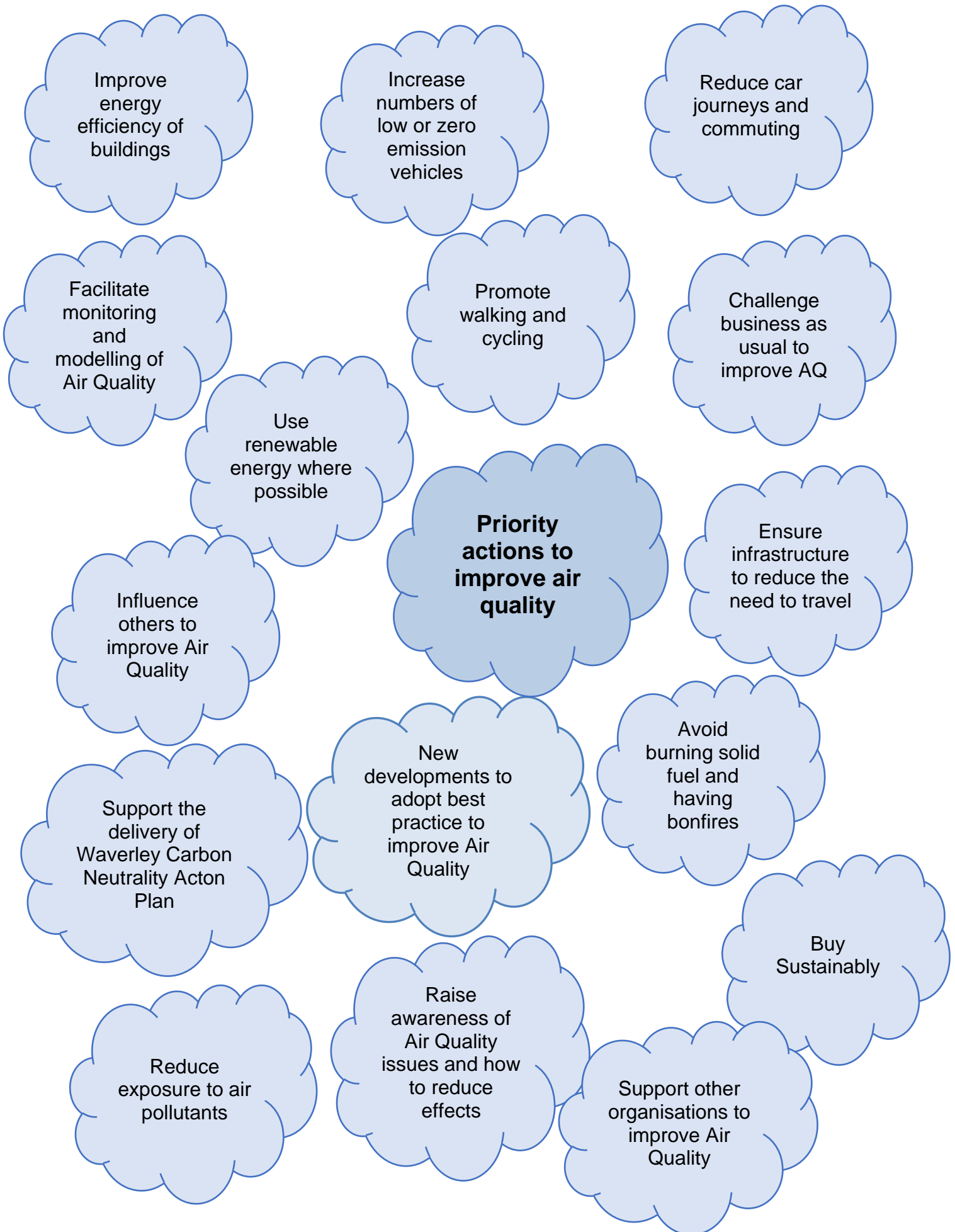
## 5 Actions

5.1 The strategy focuses on seven broad categories which set out the areas where actions are needed to influence an improvement in air quality within the borough:

- **Transport:** Working towards a less polluting transport network that both supports sustainable transport modes (walking, cycling, car share and public transport) and makes maximum use of existing resources through effective highways and transport planning, enabling a greener future, growing a sustainable economy, and tackling health inequality;
- **Energy:** working towards reducing energy usage and using less polluting forms of energy in order to reduce both greenhouse gas and local air pollutant emissions;
- **Public Health:** Encouragement of wider behavioural changes in the local population with respect to their travel choices, choice of energy within their homes and commercial spaces, and to raise awareness and educate members of the public on the health impact of air pollution;
- **Planning and Infrastructure:** Be involved in the planning decision making process as early as is practicable to mitigate potential air quality impacts and support environmentally sustainable development;
- **Strategies and Policy Guidance:** Working with other departments and stakeholders to direct the use of legislation and targeted enforcement to control air pollution;
- **Air Quality Evidence Base:** Use the best science practicable to collate air quality monitoring data, and wider information (for example modelling), to identify pollution hotspots, to support the decision-making process for interventions and to support wider policy across Waverley; and
- **Raise Public Awareness:** raise awareness around air quality issues including encouraging the community to take actions to reduce their contributions to local air quality emissions.

5.2 There are interconnections between these categories, for example, working towards a less polluting transport network will also require public awareness raising, and therefore priority actions and WBC's commitments are set out in Section 6, which cover all the main categories, but are structured under the main objectives of the strategy.

5.3 Priority actions are also highlighted below, and WBC encourages other organisations and the public to consider priority actions needed and what actions they can take to improve air quality. Section 7 includes a template for use by other organisations and the public to encourage dialogue, and commitment, for action on air quality.



## 6 Waverley Borough Council's Commitments

6.1 The following table outlines all the actions, responsibility for delivery and timescales. Importantly the key performance measure, where possible, provides a mechanism for measuring the outcome of the action. It should be noted that resource constraints within WBC and other external challenges, such as the cost of living crisis, may mean that some of these commitments may take longer to implement. Other organisations and individuals may also find actions harder to deliver, particularly in the short term.

Priority Actions	Category	WBC Commitments			
		Action	Who will deliver it?	Key Performance Measure	Timescale
<b>Leadership in Improving Air Quality</b>					
Reduce car journeys and commuting	Transport	L1. Reduce car journeys for commuting by Waverley staff by 60% consistent with the work done on the 'Where Work Happens' project by 2025 and promote low and zero emission transport including active transport	Organisational Development	Numbers of staff commuting. Numbers of staff using zero emission transport as reported in the Carbon Neutrality Action Plan	2025
Increase numbers of low or zero emission vehicles	Transport	L2. Develop a plan to reduce emissions from travel by converting the WBC fleet to 100% zero emissions including contractor vehicles through the procurement process	Environmental Services	Proportion of WBC Fleet being zero emission as reported in the Carbon Neutrality Action Plan	2025 onwards
Increase numbers of low or zero emission vehicles	Transport	L3 We will continue to work with taxi drivers to reduce emissions from this sector. Subject to Defra approval this will entail delivering a Defra grant funded project across Surrey to engage with taxi drivers and increase the proportions of low and zero emission taxis, supported by the taxi licensing process	Regulatory Services	Proportion of licenses for low and zero emission taxis	End of 2024
Improve energy	Energy	L4 We will reduce NOx and PM emissions from council housing	Organisational Development	Energy use in council housing building stock	Throughout the lifetime of this strategy

Priority Actions	Category	WBC Commitments			
		Action	Who will deliver it?	Key Performance Measure	Timescale
efficiency of buildings		building stock, through the Asset Management Strategy, which will present a decarbonisation path for existing council housing stock	Housing Services Commercial Services, Assets and Property	as reported in the Carbon Neutrality Action Plan	
Use renewable energy where possible	Energy	L5 We will support ongoing work within WBC regarding renewable energy generation projects and facilitating community power generation in the borough	Organisational Development	Renewable energy use within Waverley as reported in the Carbon Neutrality Action Plan	Throughout the lifetime of this strategy
Encourage new developments to adopt best practice to improve air quality across Waverley	Strategies and Policy Guidance	L6 We will support the implementation of the Climate Change and Sustainability Supplementary Planning Document, including supporting approaches to reduce energy use in new developments and encouraging sustainable forms of transport will also reduce local air pollutant emissions	Planning Development Organisational Development	Implementation of the SPD	End of 2024
Challenge business as usual for actions to improve air quality	Air Quality Evidence Base	L7 We will undertake further work to investigate the feasibility of Low Emission Zones within Waverley, and what form these could take (this is likely to entail a less formal approach than those implemented under the Clean Air Zone Framework, and may entail joint working more widely across Surrey)	Regulatory Services	Production of feasibility study into LEZs	2023-2024
Work with the council to facilitate monitoring and modelling of air quality	Air Quality Evidence Base	L8 We will continue to deliver the statutory requirements of the LAQM process, including annual reporting to Defra,	Regulatory Services	Annual submission of Annual Status Report to Defra and Air Quality Action Plan	2023 for AQAP, ongoing annual reporting



Priority Actions	Category	WBC Commitments			
		Action	Who will deliver it?	Key Performance Measure	Timescale
		and air quality monitoring and modelling to provide the evidence base for those reports. This includes an update of the Air Quality Action Plan due in 2023			
Buy sustainably	Strategies and Policy Guidance	L9 We will ensure sustainable procurement practices throughout the council as part of the Council's Procurement Strategy	Finance	Adoption of the WBC Sustainable Procurement Strategy	2023
Avoid burning solid fuel and having bonfires	Energy	L10 We will consider with partner agencies, alternative ways to manage waste produced from land management, other than burning, where possible.	Environmental Services	Reduction in numbers of council bonfires	end of 2024
Use renewable energy where possible	Energy	L11 We will not support commercial exploration or extraction of fossil fuels, which may in the future undergo combustion	Regeneration and Planning Policy		Throughout the lifetime of this strategy
Reduce exposure to air pollutants	Planning and Infrastructure	L12 We will look for appropriate opportunities to implement green infrastructure either within new developments, or more widely such as at schools.	Environmental Services Regeneration and Planning Policy	Implementation of green infrastructure	2024-2027
<b>Work Collaboratively to improve Air Quality</b>					
Support other organisations to improve air quality	Transport, Strategies and Policy Guidance	C1 We will work with Surrey County Council on delivering LTP4 to reduce the volume of traffic on our roads and encourage a radical transformation of transport infrastructure in favour of active transport. This will also include	Regeneration and Planning Policy	Work undertaken in support of LTP4	Throughout the lifetime of this strategy

Priority Actions	Category	WBC Commitments			
		Action	Who will deliver it?	Key Performance Measure	Timescale
		improvements to public transport, freight and delivery management an increase in low and zero emission vehicles, and park and ride facilities if appropriate,			
Support other organisations to improve air quality	Raise public awareness	C2 We will encourage collaborative working with Parish and Town Councils across Waverley to enable actions to be undertaken by residents in a coordinated way.	Regulatory Services	Measures committed to by Town and Parish Councils	Throughout the lifetime of this strategy
Promote walking and cycling	Transport	C3 We will work with SCC to deliver a Greenway network, connecting the main centres across the borough.	Organisational Development	Delivery of the Greenway network	2023-2025
Support other organisations to improve air quality	Air Quality Evidence Base	C4 We will continue to work with the Surrey Air Alliance and identify opportunities for projects to either enhance the evidence base on which decisions are made, or implement measures to improve air quality.	Regulatory Services	Air quality projects implemented across Surrey	Throughout the lifetime of this strategy
Support other organisations to improve air quality	Public Health	C5 We will work collaboratively with SCC Public Health for example undertaking information dissemination on air quality through doctors' surgeries.	Regulatory Services	Air Quality Projects delivered with Public Health	Throughout the lifetime of this strategy
Encourage new developments to adopt best practice to improve air quality across Waverley	Planning and Infrastructure	C6 We will work across WBC to ensure air quality is fully considered within planning policy, and within planning applications, to ensure that air quality is maintained, and where possible	Regulatory Services Regeneration and Planning Policy Panning Development	Planning guidance for new developments and air quality	Throughout the lifetime of this strategy

Priority Actions	Category	WBC Commitments			
		Action	Who will deliver it?	Key Performance Measure	Timescale
		improved. We will encourage best practice design measures through guidance provided to developers and will set appropriate planning conditions for mitigation where required			
Ensure that infrastructure is in place to reduce the need to travel	Planning and Infrastructure	C7 We will support extensive rollout of fibre broadband and 5G mobile coverage in order to reduce the need to travel	Regeneration and Planning Policy Assets and Property	Proportion of borough covered by 5G	2024-2027
Support the delivery of the Waverley Carbon Neutrality Action Plan	Transport, Energy, Planning and Infrastructure	C8 We will support work being undertaken on the Waverley carbon neutrality action plan, particularly in relation to active travel and energy generation	Organisational Development Regulatory Services	Regular reports to the Carbon Emergency Board	Throughout the lifetime of this strategy
Increase numbers of low or zero emission vehicles	Transport	C9 Support the installation of on street EV chargers to encourage residents and taxi drivers to switch to electric vehicles in line with the WBC Electric Vehicle Strategy.	Organisational Development Regulatory Services	Numbers of EV chargers in place	Throughout the lifetime of this strategy
Influence others to improve air quality	Strategies and Policy Guidance	C10 We will work to influence national legislation by lobbying the national Government and responding to relevant consultations on air quality	Regulatory Services	Timely responses to consultations and surveys	Throughout the lifetime of this strategy
<b>Support and Enable Behaviour Change</b>					
Avoid burning solid fuel and having bonfires	Raise Public Awareness	B1 We will continue to work through the Surrey Air Alliance with SCC's Trading Standards to develop a project to raise awareness about solid fuel burning air quality impacts and promoting/enforcing changes to rules in	Regulatory Services Communications and Customer Services	Implementation of a project about solid fuel burning	2024

Priority Actions	Category	WBC Commitments			
		Action	Who will deliver it?	Key Performance Measure	Timescale
		supplying/buying solid fuel			
Avoid burning solid fuel and having bonfires	Raise Public Awareness	B2 We will continue to encourage people not to have bonfires. Longer term we will investigate bylaws for bonfires	Regulatory Services Communications and Customer Services	Campaigns undertaken	Throughout the lifetime of this strategy
Raise awareness of air quality issues and how to reduce effects	Raise Public Awareness	B3 We will support events such as Clean Air Day and work to engage with local communities to raise awareness of measures they and individuals can take to reduce air pollution	Regulatory Services Communications and Customer Services	Input into Clean Air Day	Throughout the lifetime of this strategy
Promote walking and cycling	Transport	B4 We will adopt Local Cycling and Walking Infrastructure Plans for Farnham and Waverley	Organisational Development	Adoption of LCWIPs	2024-2026
Raise awareness of air quality issues and how to reduce effects	Raise Public Awareness	B5 We will provide tailored, clear, accurate and consistent messages about the benefits of good air quality, utilising the Waverley Borough Council website as a platform to inform residents	Regulatory Services Communications and Customer Services	Annual review of our air quality web pages with updates if needed	Throughout the lifetime of this strategy
Raise awareness of air quality issues and how to reduce effects	Raise Public Awareness	B6 Carbon Neutrality Action Plan is setting up a Citizens Assembly to encourage public participation in shaping the climate emergency agenda – we will investigate the feasibility of using this mechanism to raise awareness on air quality.	Organisational Development Regulatory Services Communications and Customer Services	Use of Citizens Assembly for participation	2023-2024
Raise awareness of air quality issues and how to reduce effects	Raise Public Awareness, Transport	B7 We will work with SCC to tackle vehicle idling emissions at key locations such as on Station Hill in Farnham, other level	Regulatory Services	Anti-idling signs implemented	2023-2024

Priority Actions	Category	WBC Commitments			
		Action	Who will deliver it?	Key Performance Measure	Timescale
		crossings and outside schools			
Raise awareness of air quality issues and how to reduce effects	Raise Public Awareness, Public Health	B8 Through the SAA we will continue to work with Surrey Heartlands Clinical Commissioning Group to contribute to a project looking at links between paediatric asthma and AQMAs to help inform and take forward a paediatric asthma care bundle	Regulatory Services	Implementation of asthma care bundle	2023-2024
Raise awareness of air quality issues and how to reduce effects	Raise Public Awareness, Transport	B9 We will work with SCC to support the eco-school's initiative (including promoting active travel, Mode Shift Stars, Bikeability training, walking training, and an understanding of impacts on air quality).	Regulatory Services	Number of schools signed up to the Eco-school's initiative	2023-2025
Promote walking and cycling	Transport	B10 We will work with schools to identify and remove barriers to active travel	Regulatory Services	Levels of active travel within schools which have had interventions	2024-2026

## Funding

- 6.2 Reducing local air pollutant emissions is a corporate priority. However, it is recognised that there are financial constraints in implementing some of WBC's commitments outlined in this strategy. The council has developed a prioritisation methodology which covers a number of criteria including any ongoing revenue costs or savings, deliverability, the extent to which the proposed scheme meets the council's priorities and the environmental credentials of the project.
- 6.3 WBC will continually look for external sources of funding as they become available to supplement the costs of actions outlined in this strategy. This includes, but is not limited to, the Defra Air Quality Grant, which is an annual programme to award grants to local authorities, largely to improve air quality within their areas, or undertake work which may improve the evidence base on which actions are based. Some projects may be implemented

collaboratively, for example with Surrey County Council, or across local authorities within Surrey (through the Surrey Air Alliance). The Defra Air Quality Grant programme allows for joint bids to be submitted, which SAA have already been successful in being awarded funding.

- 6.4 It is also possible to utilise contributions from developers to ensure that development does not worsen air quality, and where possible contributes to positive improvements. The carbon neutrality action plan commits to looking for ways to utilise the Community Infrastructure Levy (CIL) for actions to reduce climate change gas emissions, many of which will assist in reducing local pollutants.

## **Governance**

- 6.5 Waverley Air Quality Steering Group and Farnham Air Quality Working Group were established in 2017 to discuss air quality issues in the Borough and ensure actions to improve air quality are considered. The Air Quality Steering Group now reports to the Climate Emergency Board, and the progress of this Strategy will be incorporated into this reporting process.
- 6.6 WBC continue to take steps towards implementing small measures at every available opportunity and have developed joint working groups with other colleagues both externally through the Waverley Air Quality Steering Group, Farnham Infrastructure Board, Surrey Air Alliance, and internally within WBC. The Farnham Infrastructure Board led by SCC and local stakeholders, including WBC, looks to deliver a sustainable infrastructure programme for Farnham, including transport infrastructure.
- 6.7 Officers will continue to work within the Surrey Air Alliance to ensure consistent and collaborative working across Surrey. It is recognised that there are potential sources outside of WBC's area, such as Farnborough Airport, and WBC will continue to work with neighbouring authorities on issues which will be of relevance to air quality.
- 6.8 Annual progress will be reported in the ASR to be submitted to Defra. The Strategy will be reviewed every 5 years and updated as appropriate.
- 6.9 A communications plan will be adopted as part of the strategy to ensure that the aspects of information dissemination and behaviour change are undertaken effectively over time. This will include messaging around a range of issues, including anti idling, solid fuel burning and wider messaging around health effects.

## 7 Template for Adoption of Actions by Others

7.1 The following table outlines the priority actions of the strategy and provides a template which could be used by organisations, or individuals, to adopt specific actions of their own. Not all priority actions will be relevant for all organisations. Examples of actions which could be taken are included within WBC's commitments in Section 6.

Priority Action		Commitments
1	Reduce car journeys and commuting	
2	Increase numbers of low or zero emission vehicles	
3	Improve energy efficiency of buildings	
4	Use renewable energy where possible	
5	Challenge business as usual for actions to improve air quality	
6	Work with the council to facilitate monitoring and modelling of air quality	
7	Buy sustainably	
8	Avoid burning solid fuel and having bonfires	
9	Reduce exposure to air pollutants	
10	Support other organisations to improve air quality	
11	Promote walking and cycling	
12	Encourage new developments to adopt best practice to improve air quality across Waverley	
13	Ensure that infrastructure is in place to reduce the need to travel	
14	Support the delivery of the Waverley Carbon Neutrality Action Plan	
15	Influence others to improve air quality	
16	Raise awareness of air quality issues and how to reduce effects	

## Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQC	Air Quality Consultants
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
AQS	Air Quality Strategy
ASR	Air quality Annual Status Report
CAS	Clean Air Strategy
CERC	Cambridge Environmental Research Consultants
COMEAP	Committee On the Medical Effects of Air Pollution
Defra	Department for Environment, Food and Rural Affairs
EU	European Union
EV	Electric Vehicle
HGV	Heavy Goods Vehicle
HWS	Health and Wellbeing Strategy



## Waverley Borough Council

JSNA	Joint Strategic Needs Assessment
LAQM	Local Air Quality Management
LCWIP	Local Cycling and Walking Infrastructure Plan
LGV	Light Goods Vehicle
MP	Member of Parliament
NHS	National Health Service
NO <sub>2</sub>	Nitrogen Dioxide
NO <sub>x</sub>	Nitrogen Oxides
PHOF	Public Health Outcomes Framework
PM <sub>10</sub>	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
PM <sub>2.5</sub>	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
SCC	Surrey County Council
UTC	Urban Traffic Control
WBC	Waverley Borough Council