

Spelthorne Borough Council's 2024-2029 Air Quality Action Plan Consultation Response Report

In fulfilment of Schedule 11 of Environment Act
1995 Local Air Quality Management
September 2024



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Executive Summary

Schedule 11 of the Environment Act 1995 requires the Council to consult the public and specified statutory consultees. Public consultation was carried out between Monday 20 May 2024 to Sunday 30 June 2024, via an online questionnaire to residents and businesses, supported by publicity on the Council website, social media, community posters, digital screen graphics (Elmsleigh Centre and Staines High Street), and e-news article.

The required statutory consultation was undertaken via email and included the Environment Agency (EA), Transport for London (TfL), the Mayor of London, Surrey County Council (SCC), all neighbouring local authorities, other relevant public authorities, and bodies representing local business interests. In addition to the online questionnaire responses, a detailed response was received from the Department for Environment, Food and Rural Affairs (DEFRA), and responses also received from SCC transport colleagues (as the Transport Authority in Spelthorne), the EA, and Public Health officials at SCC.

Respondents showed broad support for improving air quality through a series of actions, and an appreciation of the need to improve air quality. The questionnaire responses showed that the issues of most importance to respondents were: air quality from Heathrow Airport, improving transport planning and infrastructure, facilitating active travel and addressing pollution where vulnerable members of the population are exposed (e.g. Schools, hospitals, care homes etc.). There was a good awareness of air quality in general, but much lower awareness of alert and forecast services such as 'Airtext and AirAlert'. This suggests that increasing awareness of existing services would be a cost-effective way of potentially changing behaviour (i.e. either reducing exposure to air pollution or modal shift to active travel, burning lower emission fuels etc). It appears from questionnaire responses that there is potential for modal shift to walking, public transport and to a lesser extent, cycling, as long as some of the barriers to people undertaking journeys with these modes are overcome. The need for clear, safe pedestrian and cycle routes, more frequent and reliable public transport and improvements to the charging infrastructure for Electric Vehicles were all cited as potential priorities. There are measures which should improve all of these items (for example, measure 18 for delivery of bus priority measures to assist with reliability of buses, measure 11 to promote the use of cleaner technology and fuels which includes increasing charging infrastructure). In relation to improvements to pedestrian and cycle routes, as suggested by SCC, a new measure will be added to ensure that the Local Cycling and Walking Infrastructure Plan (LCWIP) is explicitly included in the Air Quality Action Plan (AQAP). The LCWIP is a key transport planning document that has been defined by the Department for Transport (DfT), which aims to support recent uptakes in the active travel modes of

walking and cycling by delivering improved facilities for existing active users whilst also encouraging a mode shift for new users. The key outputs for an LCWIP are network plans for key walking and cycle corridors and a prioritised programme of infrastructure improvements at concept design stage, with the document used to assist in funding allocations for walking and cycling routes.

Question 2 (on a scale of 1 to 5, how important do you feel the following broad principles will be, in dealing with air quality) also showed that the majority of respondents thought it was important that emissions from Heathrow Airport are dealt with. Emissions from Heathrow Airport are not within the remit of Spelthorne Borough Council, however, Heathrow Airport Ltd has played an active role in the development of the measures which incorporate the airport. In addition, SBC are an active participant in the Heathrow Strategic Planning Group, a joint partnership of local authorities and Local Enterprise Partnerships (LEPS) responsible for planning the land use, transport, environment, economic development and sustainable development of the sub-region surrounding Heathrow Airport. Spelthorne are also an active participant in the Council for the Independent Scrutiny of Heathrow Airport (CISHA), including within the Air Quality Working Group. Through these fora, it will be ensured that Spelthorne Borough Council (SBC) influence the future of Heathrow as far as they are able, while continuing to lobby at national and regional level in relation to major infrastructure decisions, such as a third runway. Working with Heathrow Airport is listed as one of the five priorities of the AQAP, reflecting the local concern identified in the consultation. In terms of the size of the issue, background emissions from Heathrow as a proportion of total backgrounds (as modelled by Defra on a 1km grid square basis) has also been included within the AQAP, as additional evidence base for the measures.

In relation to the demographic of the population which responded, the majority (33%) of respondents were between 55-64 years of age. People aged 25-34 represented the age groups with the lowest (6% for each) proportion of responses. There were slightly more female (50%) than male (44%) respondents, with 6% preferring not to state their gender, reflecting to some extent census data showing that 50.8% of residents in Spelthorne are female, with the remaining 49.2% being male. 13% of respondents were disabled with 7% preferring not to say, which reflects the percentage of residents classed as disabled under the Equality Act (14.2%). Most respondents were from Sunbury (35%), followed by Staines (22%) and Ashford (16%). This may be due to more representation from their active residential associations. 15% preferred not to state their ethnicities. Of those that did, the majority of respondents (78 %) were white with very few distributed across other ethnic groups (7%).

Specific Changes to the Draft Action Plan:

The following specific changes will be made to the document:

1. In light of SCC's Liveable Neighbourhoods' being renamed 'Local Street Improvements' (LSI's), Measure 16 will be replaced with 'Implement Local Street Improvements in line with SCC Local Street Improvements Programme'.
2. A Measure will be added 'Support and help implement the [Spelthorne Local Cycling and Walking Infrastructure Plan](#)'. This is to recognise the importance of this document in securing funding for walking and cycling infrastructure (which has been recognised through the consultation responses as a barrier to the uptake of active travel). It also ensures consistency with other borough AQAPs in Surrey.
3. In response to Defra suggestions, a new section has been added into the AQAP which outlines the difficulties of quantifying measures within the plan, and where possible includes some quantification of emissions of specific measures. Over time, it may be that data become available (for example on the effect of some of the climate change measures within the plan) which can be quantified into associated NO_x and PM emission reductions. This information is then linked to a cost effectiveness table.

In addition, general text updates have been made to ensure clarity of the document, or to respond to specific suggestions from Defra (such as the inclusion of population information within the AQMA).

The outcomes of consultation will also be used to assist SBC and SCC in terms of prioritisation of actions for implementation. Responses which are outside of the scope of SBC (such as those relating to Heathrow, or Environment Agency processes, or fall within the remit of Surrey County Council) have been referred to the relevant third party, and in some cases, meetings held to discuss taking forward the outcomes of the consultation.

If you have any comments on this Consultation Report, please send them to Spelthorne Borough Council (SBC) Pollution Control at: Council Offices, Knowle Green, Staines-upon-Thames, TW18 1XB Tel: 01784 444 213 Email: pollution.control@spelthorne.gov.uk

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Introduction

The Draft 2024-2029 Air Quality Action Plan (AQAP) was produced as part of Spelthorne Borough Council's statutory duties under the Local Air Quality Management framework (LLAQM). It outlines the action the Council will take to improve air quality in the Borough of Spelthorne between 2024 and 2029. The action plan replaces the previous action plan which ran from 2005 to 2024.

Within this new plan, actions have been developed that can be considered under seven broad topics: - (1) policy guidance and development control, (2) promoting low emission plants, (3) promoting low emission transport, (4) promoting travel alternatives, (5) public information, (6) transport planning and infrastructure then (7) traffic management.

It is a legal duty under the Environment Act 1995 and the LLAQM Framework to consult specific parties and agencies during the development of any air quality strategies and action plans. The following SBC parties are engaged during the process.

- All internal stakeholders within the Council
- The Secretary of State, Residents, Local Members of Parliament (MPs) and SBC Council Members
- The Environment Agency (EA)
- Surrey County Council (SCC)
- All neighbouring local authorities
- Surrey's Air Quality Alliance working group or any other relevant groups
- Greater London Authority / Transport for London
- Bodies representing local business interests (e.g. Chamber of Commerce and Enterprise) and other organisations such education providers, charities, local community groups and health care providers.

The 2024-2029 AQAP was prepared by Air Quality Consultants Ltd on behalf of SBC with the support and agreement of the following departments and wider stakeholders including: - (1) Strategic Planning, (2) Climate Change and Sustainability, (3) SCC's Transport, (4) SCC Public Health,(5) SBC Environmental Health, (6) Neighbourhood Services, (7) Leisure (health and wellbeing, and active travel), (8) Heathrow Airport Ltd, and (9) National Highways.

After meeting and engagement with different parties during the draft AQAP plan development, the draft was produced in April 2024. Stakeholders and the public were consulted on the measures proposed as planned.

Following the consultation exercise presented in this report, the final and updated plan will be signed off by the Department of Environment, Food and Rural Affairs (DEFRA), and SBC's Environment and Sustainability Committee. The plan will subsequently be monitored and reported on within our Annual Status Report, which is available on our website.

1. Consultation Methods

Schedule 11 of the Environment Act 1995 requires the Council to consider any representations made in accordance with the consultation. Therefore, public consultation was carried out between Monday 20 May 2024 to Sunday 30 June 2024 as detailed in the following section of this report. A copy of the communication/engagement plan and the survey questionnaire used are appended to this document (Appendix A).

We undertook the following stakeholder engagement: -

- Online questionnaire to residents and businesses to seek opinions on actions,
- Publicity on website and social media and
- Articles in local newspaper.


The statutory consultation undertaken via email included the EA, Transport for London (TfL), the Mayor of London, SCC, all neighbouring local authorities, other relevant public authorities, and bodies representing local business interests. This report presents the responses to the stakeholder engagement and public consultation undertaken. The detailed results to the survey presented in the following sections are appended to this report (Appendix A).

2. Results, Interpretation & Changes Made to the AQAP

2.1 Statutory Responses

All correspondences received are appended to this report (Appendix B) and a summary presented in the following table.

Table 2.1 – Statutory Consultation Undertaken and Responses

Consultee	Consultation Undertaken	Summary of Response
The Secretary of State	Yes, draft report submitted to Defra and email correspondence sent.	DEFRA Appraisal was undertaken in May 2024. The Draft AQAP was accepted with commentary that have been addressed in the final plan. 
The Environment Agency	Yes, via email correspondence	Unfortunately, the EA are not able to provide detailed comments on every Air Quality Action Plan received. However, a summary of the issues/priorities (including for The Environment Agency role in Air Quality, statements about preferred position, traffic, developments, non-road mobile machinery, waste management sites, regional approach to local air quality and a summary) that are common to each AQAP was provided. SBC intention to work collaborative with other stakeholders was noted. The EA is not aware of any waste facilities in the borough of Spelthorne that are causing or contributing to failures of air quality standards.
The highways authority	Yes, Surrey County Council transport key member of Air Quality Steering Group	<p>The Transport Policy Team’s response to the draft AQAP consultation was as follows: -</p> <p>Agree with the aims and actions identified within the AQAP.</p> <p>Measure 16 refers to ‘Liveable Neighbourhoods’. These have now been renamed ‘Local Street Improvements’ (LSIs). More information on the County’s LSI programme is available here: https://www.surreycc.gov.uk/roads-and-transport/policies-plans-consultations/transport-plan/strategies/local-street-improvements We recommend that the reference to ‘Liveable Neighbourhoods’ within the AQAP be replaced with ‘Local Street Improvements’ because the Liveable Neighbourhoods programme is now the Local Street Improvements Programme.</p> <p>The Spelthorne Local Cycling and Walking Infrastructure Plan (LCWIP) is the primary plan for implementing walking and cycling improvements in Spelthorne. It will be used by SCC as the primary document for securing funding for walking and</p>

Consultee	Consultation Undertaken	Summary of Response
		cycling infrastructure in the borough. It is much more wide reaching than the Local Street Improvements programme, whose schemes are much smaller and more local in scale. It is important that, as the key vehicle for implementing cycling and walking infrastructure in the borough, the LCWIP is named as a standalone measure. This is consistent with other AQAPs from districts and boroughs across the county that have an LCWIP in place, as Spelthorne does.
All neighbouring local authorities	Yes, through Surrey Air Alliance and neighbouring London Boroughs will be consulted on as part of the wider public consultation	Consultation made but no response received.
Other public authorities as appropriate, such as Public Health officials	Yes, through Surrey Air Alliance and the SCC.	Consultation was made and a response was received from public health online via the questionnaire. PH followed with an email to add that, <i>under the Housing and Planning section on page 10, Spelthorne may wish to sign up to the Healthy Homes Principles which covers indoor and ambient air pollution. Healthy Homes Principles - Town and Country Planning Association (tcpa.org.uk)</i>
Bodies representing local business interests and other organisations as appropriate	Engagement was undertaken with these bodies via online consultation	Consultation was made but no response received on a headed letter.

2.2 Non-Statutory Responses

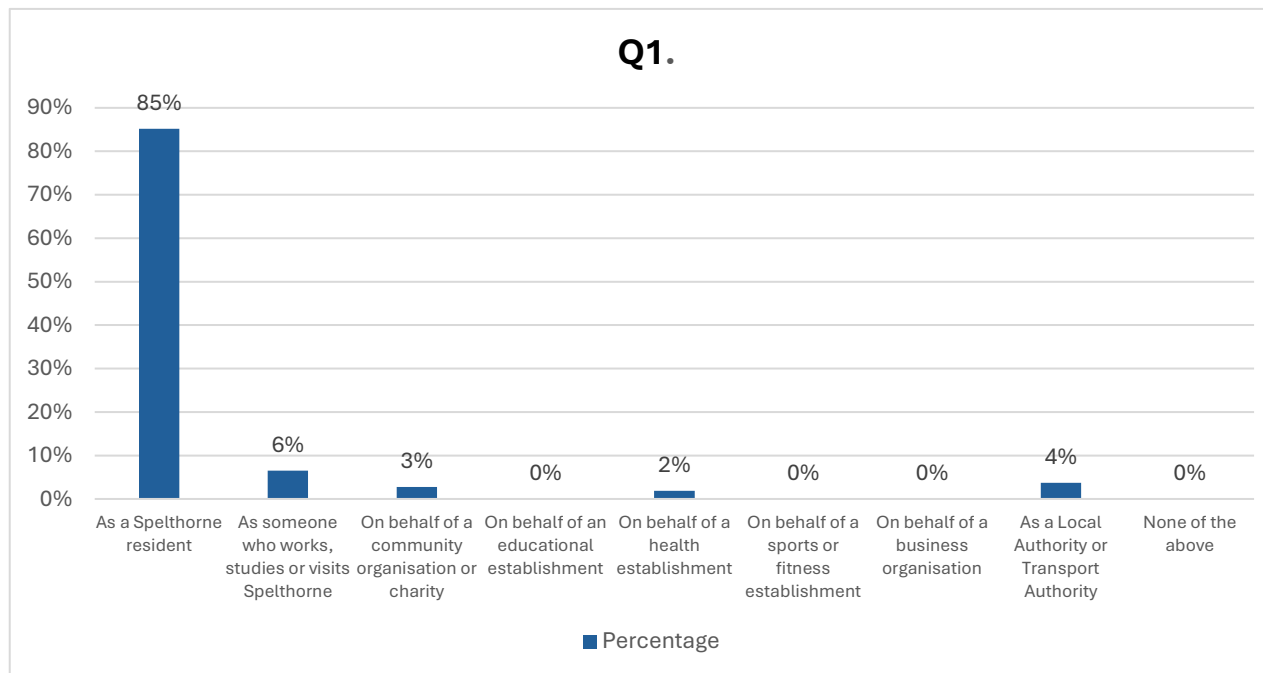
All correspondence and detailed qualitative responses received are appended to this report (Appendix **B**) and a summary presented in the following section. Most suggestions and general comments made, related to the following issues: -

- localised traffic problems and congestion,
- the inadequacy of heat pumps, said to create noise pollution and costly to implement,
- the suggestions for more charging points to be deployed across the borough.
- lack of funding to purchase electric vehicles,
- poor and localised road safety,
- The requirement for more cycling and walking infrastructure,
- the inadequacy of pavements for disabled people,
- the significant number of potholes and the need for the road to be repaired.
- Suggestion of vegetation clearance along roads and subways,
- the perceived impact of the EcoPark waste incinerator on air pollution and
- the perceived environmental impacts of Heathrow Airport operations.

It must be noted that where the scope of a request/comment/suggestion made was outside the remit of SBC, the responses have been referred to the relevant third-party organisation/partner for comment, action or for consideration during the compilation of their future strategies /policies.

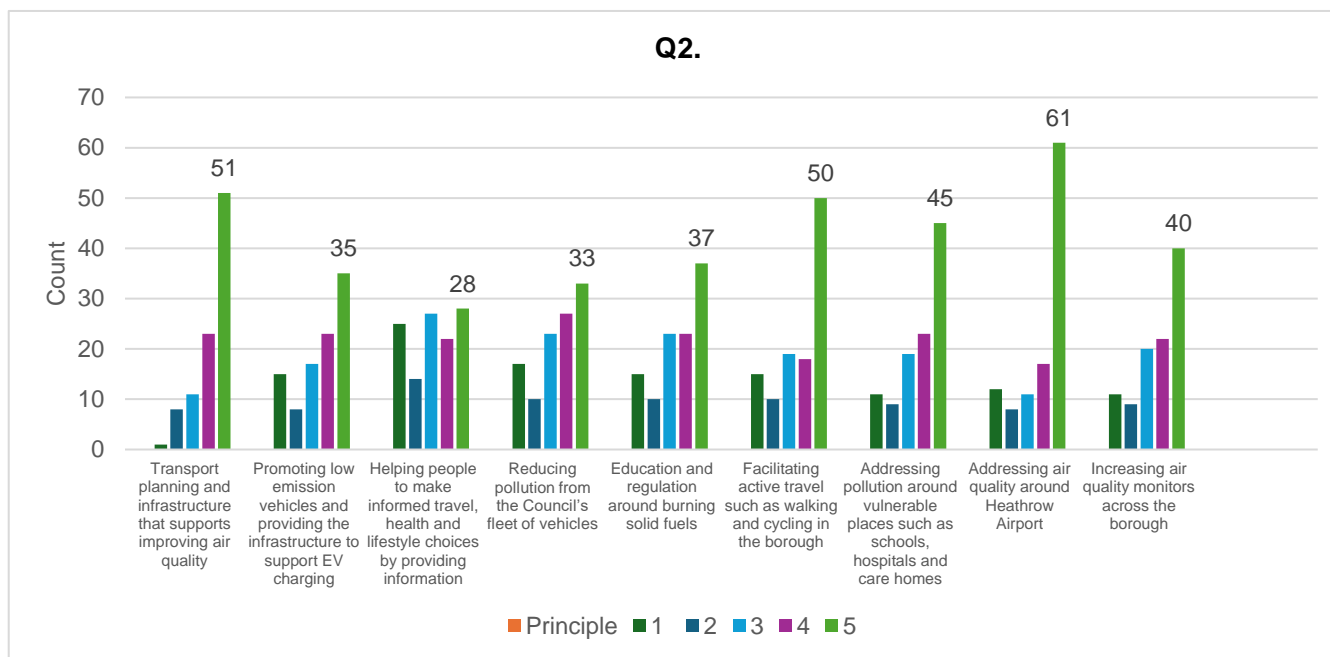
2.1 Questions Asked within the Consultation.

Q1. Which of the following best describes how you wish to respond to this survey?



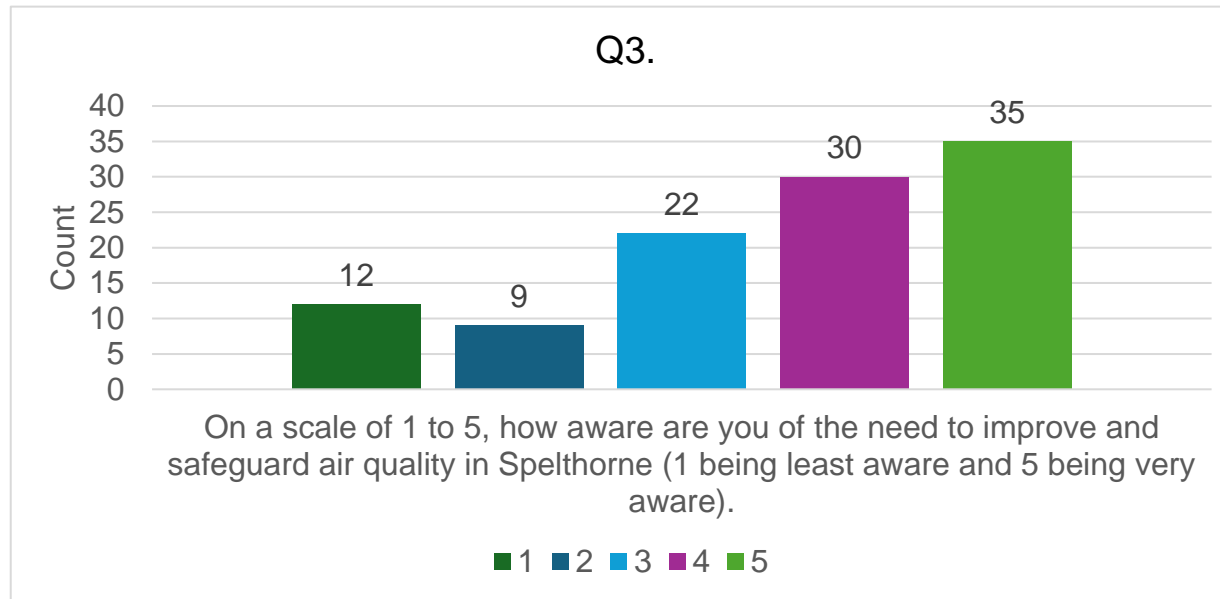
As anticipated, most respondents were residents (i.e. 85%), who represent the highest group of the population sampled. As of the 2021 census, Spelthorne has a population of 103,000 and is the 14th most densely populated of the South East's 64 Local Authority areas with 2,295 of residents per square kilometre. 108 responses were received, which is appropriate for these types of surveys because other local authorities have received similar number of responses in the past.

Q2. On a scale of 1 to 5, how important do you feel the following broad principles will be in dealing with air quality. (with 1 being the least important and 5 being the most important)?



Overall, the SBC broad principles in dealing with air quality were found to be generally the most important to the public. 25 to 60 out of 108 respondents thought that the measures were the most important broad principles that should be considered to deal with air pollution.

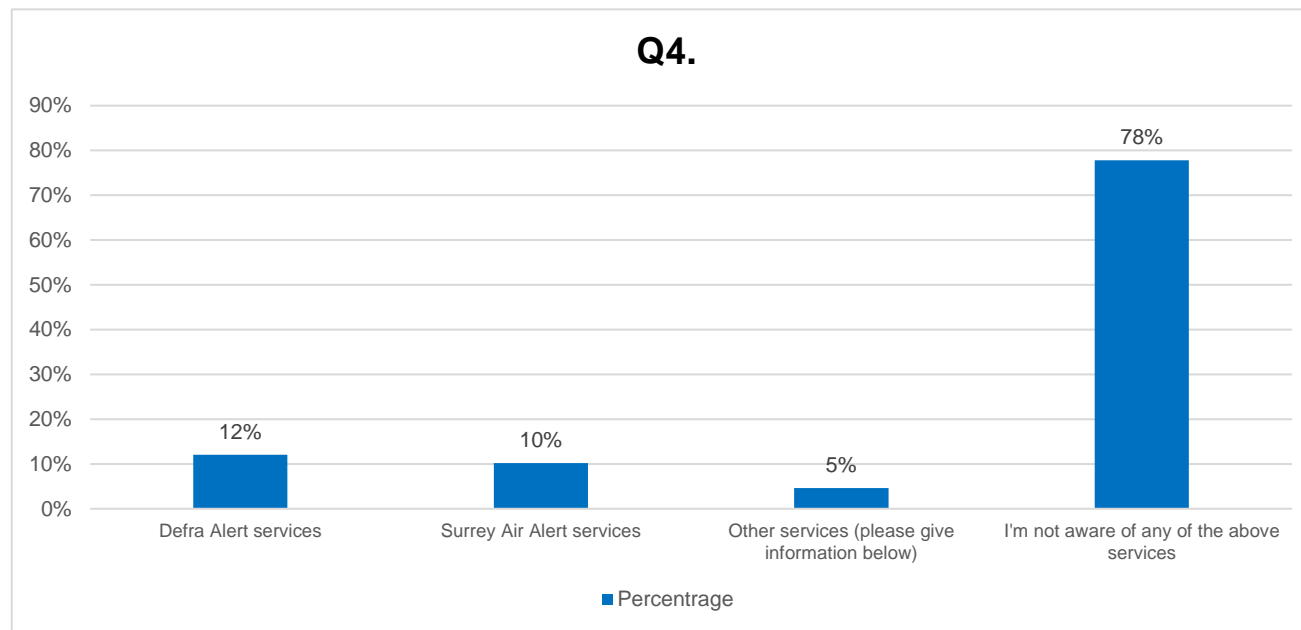
Q3. On a scale of 1 to 5, how aware are you of the need to improve and safeguard air quality in Spelthorne (1 being least aware and 5 being very aware)?



Overall, the most respondents are very aware of the need to improve and safeguard air quality in Spelthorne.

Q4. Air Quality Public Information

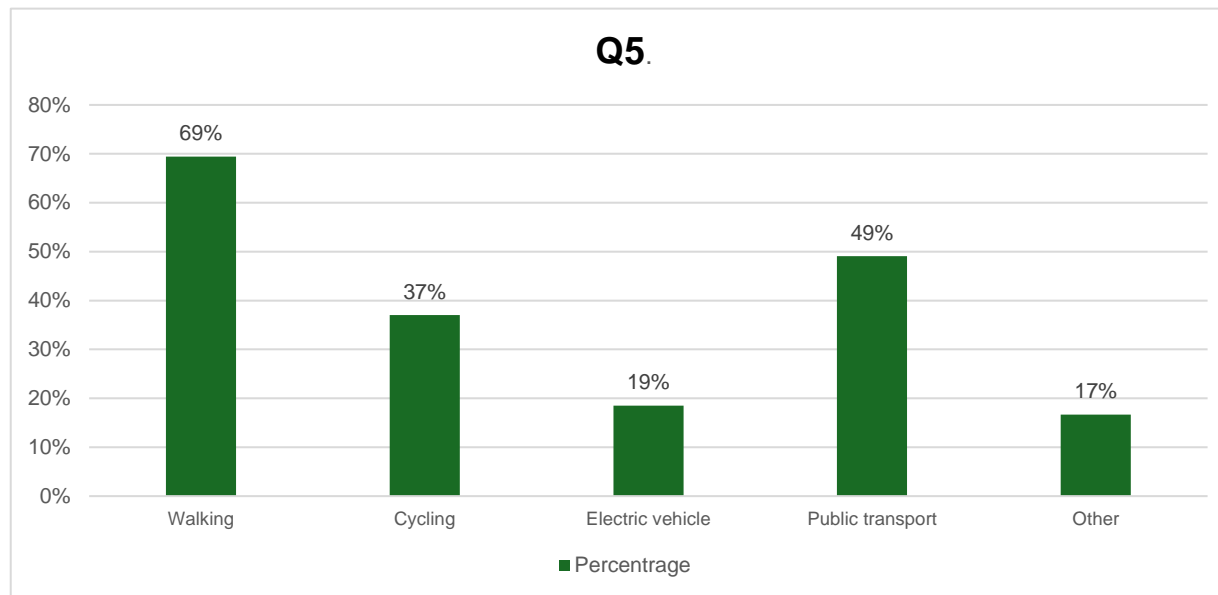
There is a need to increase public awareness and support individuals to reduce their personal exposure to air pollution. Were you aware of the following Alert services?



78% of the respondents were not aware of Alert services. Which raises the need for public information on air quality alert services. Details on all available and relevant services will be publicised in due course.

Other services stated within the open question responses include Plume, the Environment Agency and AirText. Other sources mentioned by respondents included weather reports and the council's website.

Q5. Awareness and Behavioural Change - Which modes of travel would you consider increasing in your day-to-day activities?



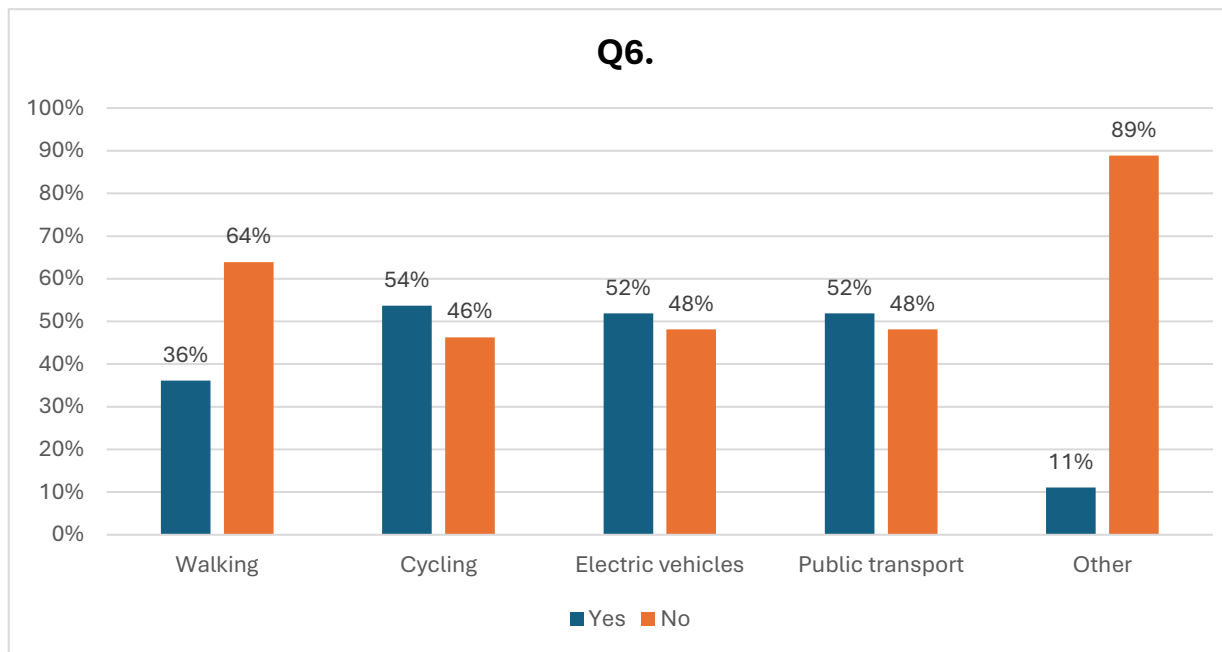
Most respondents would consider/adopt sustainable mode of travelling, i.e. walking and taking public transport. Details on other comments made are appended to this report.

Other commentaries made were related to traffic, road safety, potholes, cycle infrastructures, pavements, mode of transport, disability and the need for transport. These comments have been referred to SCC transport/highway/parking team.

Open Question Responses:

Within the Open text questions, a number of respondents would consider altering their current mode of travel with cycling, pending better maintenance of the designated cycle routes. People with limited mobility have raised concerns over road safety and damaged infrastructure, whilst a few comments related to car usage.

Q6. Awareness and Behavioural Change - Are there any barriers in Spelthorne to the following?

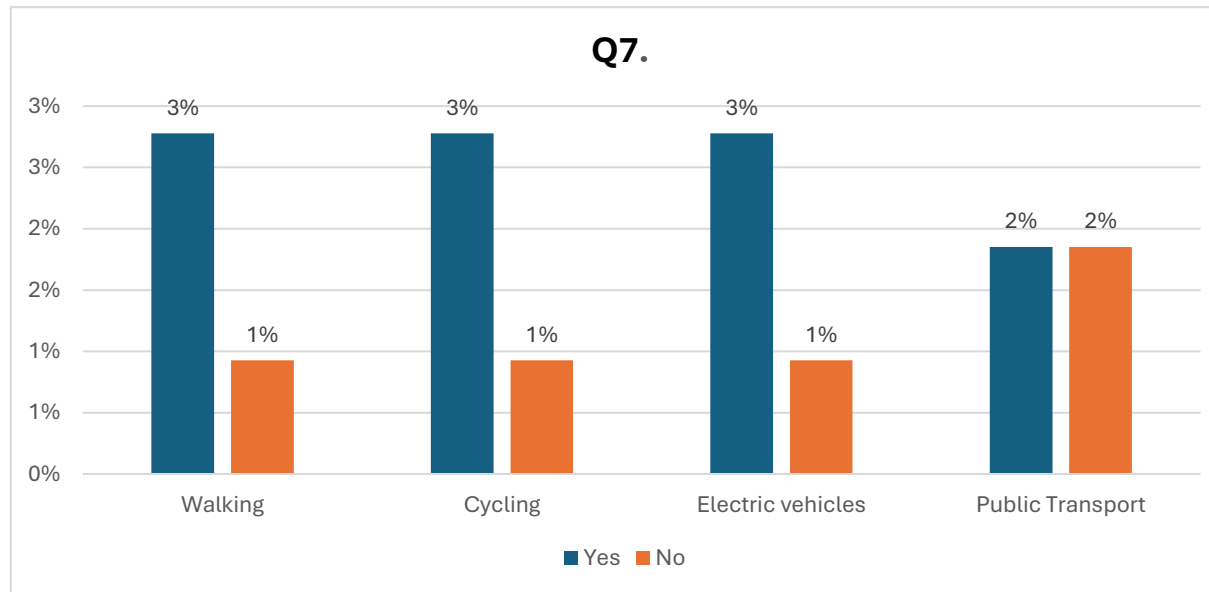


Most respondents found no barriers to walking. While the majority found barriers to cycling, electric vehicles and public transport. The details of the comments made are summarised in the following section and the detailed responses appended to this report.

Open Question Responses:

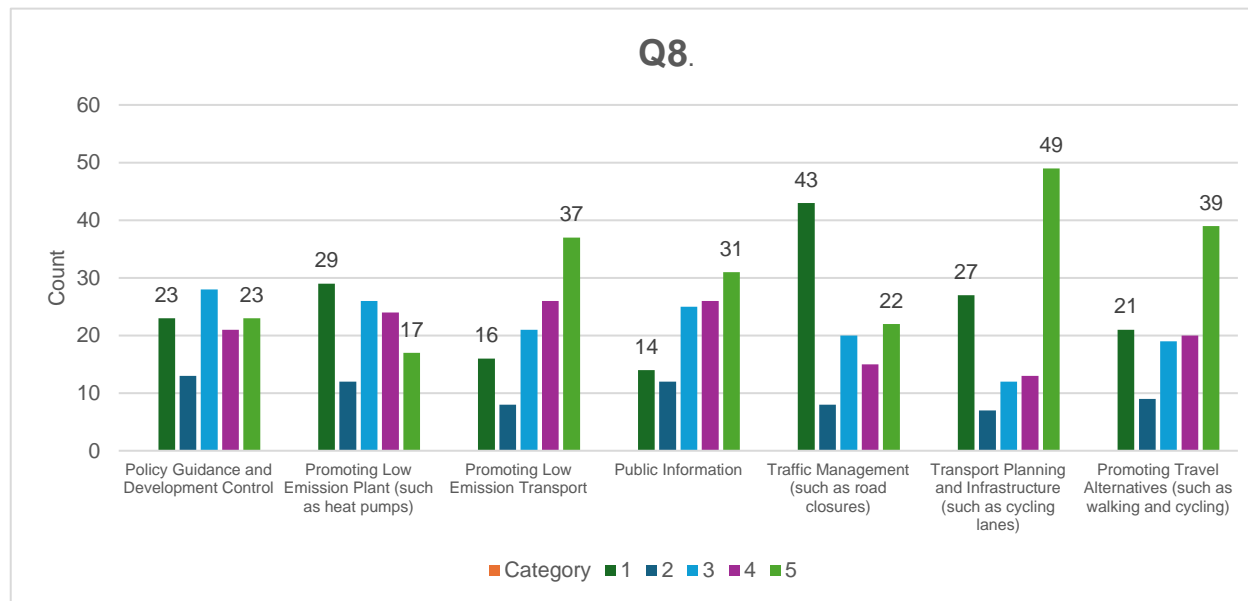
Within the Open text responses, most of the respondents reported no barriers within Spelthorne, relating to the listed modes of transport. Of the respondents that identified barriers, the main issues raised were associated with: lack of clear, and safe, pedestrian and cycle routes; the unreliability and infrequency of available public transport (mainly buses); and the lack of available electric charging vehicle points.

Q7. Awareness and Behavioural Change - If you are responding as a Local Authority representative, have you publicised the following types of active travel to your residents?



Most Local Authority representatives have publicised active travel to their residents. From the open text questions, the authorities that responded published information in their ASRs, newsletters and on their websites.

Q8. On a scale of 1 to 5, how important do you feel the following proposed categories will be in dealing with air quality (with 1 being the least important and 5 being the most important)?

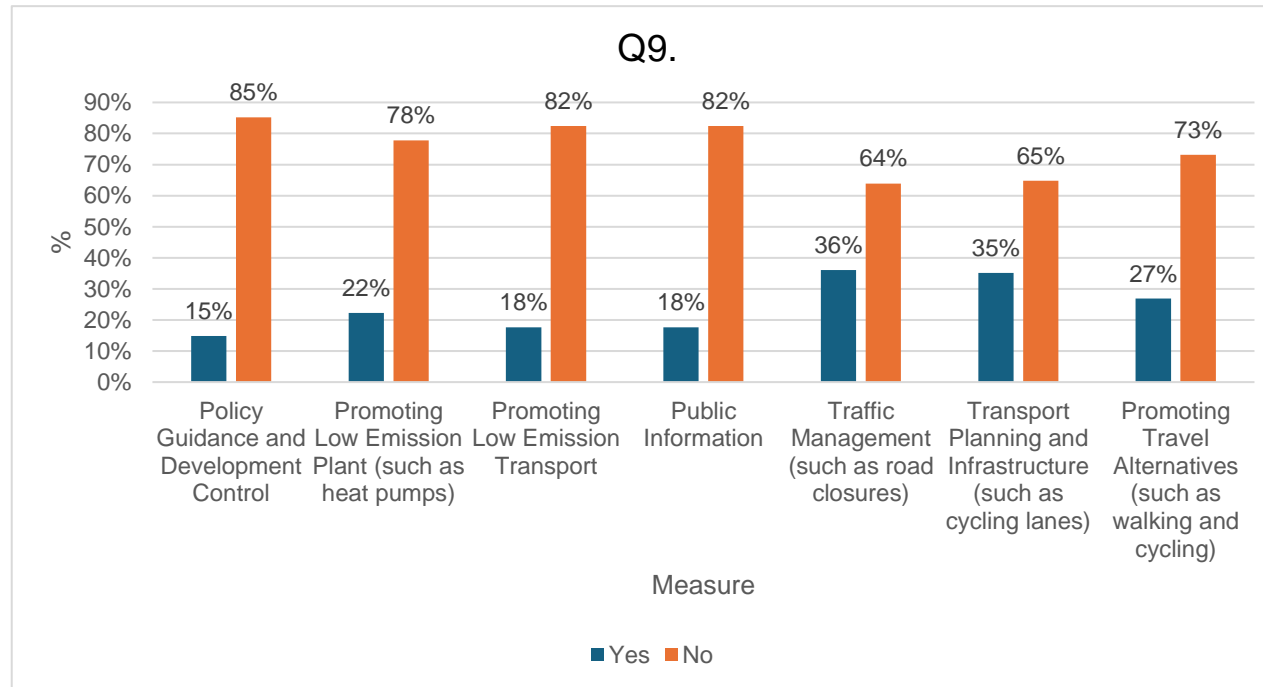


Transport planning and infrastructure score the highest (49%), then traffic management (such as road closures) (43%) and promoting travel alternatives (such as walking and cycling) (39%).

Open Question Responses:

According to the respondent's answers top open questions the majority have raised that traffic management measures are one of the most important ways of dealing with air quality, as well as transport planning and infrastructure - mainly safer pedestrian and cycling lanes. There are also comments about reducing emissions from homes, and heat pumps not necessarily being practical for all homes. Comments were very mixed, with some respondents wanting more measures for cyclists and some wanting more measures for car users.

Q9. Do you have any suggestions for the following measures?



Most respondents had no suggestion to make on any of the measures.

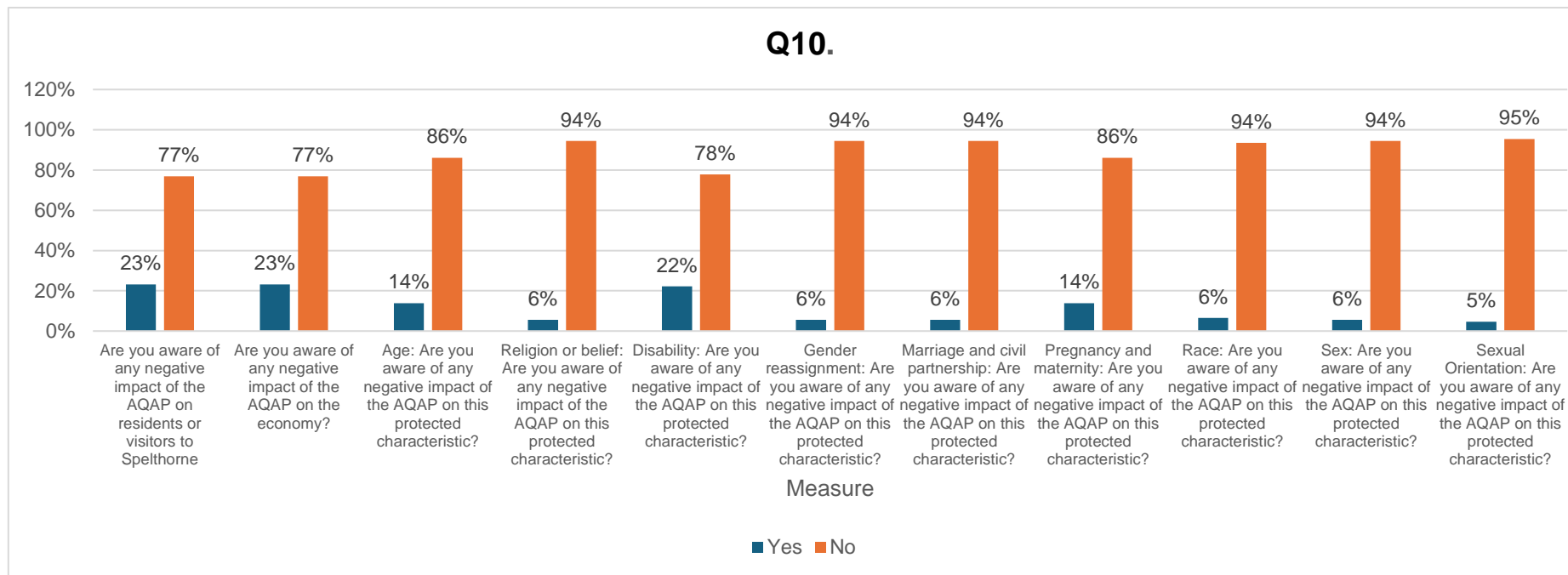
Open Question Responses:

Of the respondents that provided suggestions on the measures presented in the graph above, the main three topics related to:

- improvements on the existing cycling infrastructure. Many of the current cycle paths are not well-maintained and often dangerous for use, resulting in cyclists utilising the pavements or sections of the roads;
- consideration for building insulation prior to the instalment of Air-Source Heat Pumps (ASHPs), as well as overall reduction of maintenance and installation costs; and

Q10. Impact of the measures proposed in the draft Air Quality Action Plan (AQAP)

Do you have concerns about any of the following?

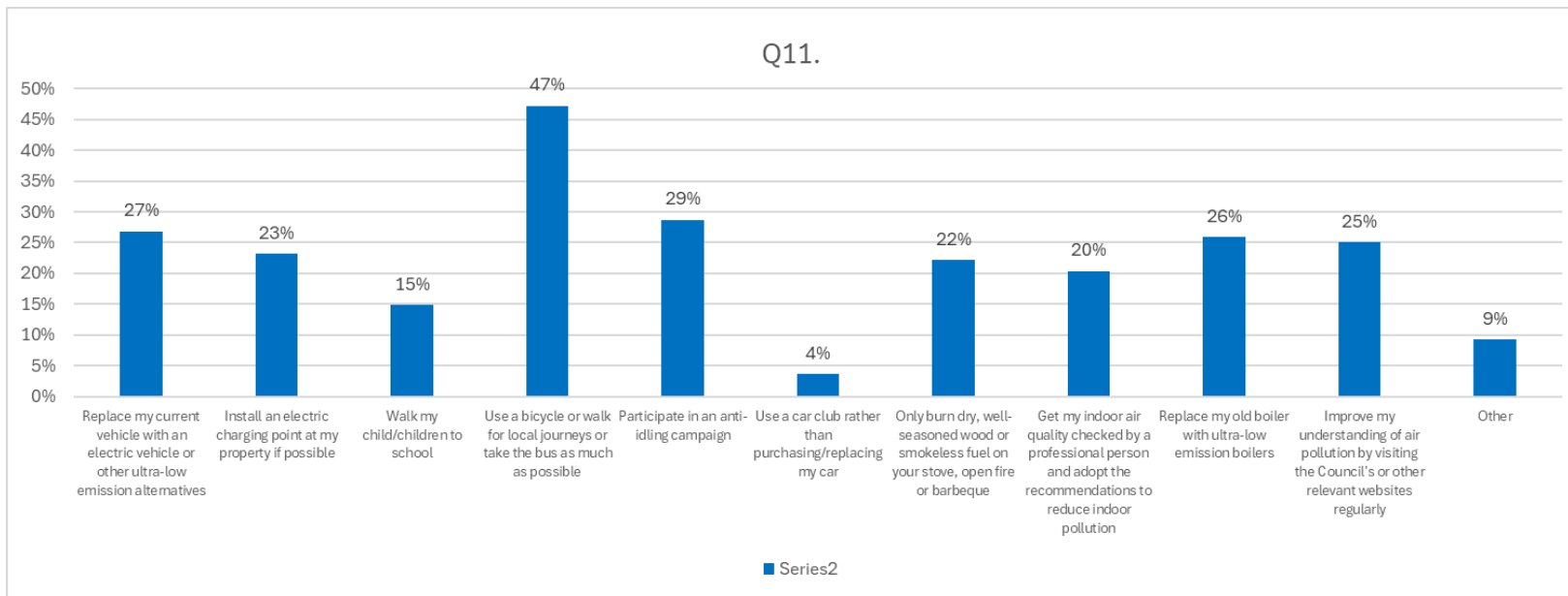


Most respondents (77%-95%) thought the proposed measures were impactful and had no concerns. The few negative responses may be related to the fact that none of the measures presented within the AQAP have had their impact on air quality quantified. The action plan did not state whether the implementation of measures will result in the objective being obtained, though it is recognised there are currently no exceedances within either AQMA at relevant exposure. There was also limited information on the estimated cost of measures, and no cost-benefit analysis was contained within the action plan. The points specified have been added to the plan.

Open Question Responses:

In the open text question, the majority of the respondents expressed their concerns on the financial burden that the measures within the AQAP would inflict on the elderly and people with disabilities, as well as the lack of representation for these two groups. In addition, two comments referred to the implications that the measures would have on visitors of Spelthorne, and how they would be deterred from entering the Borough.

Q11. What lifestyle or behaviour changes would you be willing to make to improve poor air quality? Please tick all which apply.



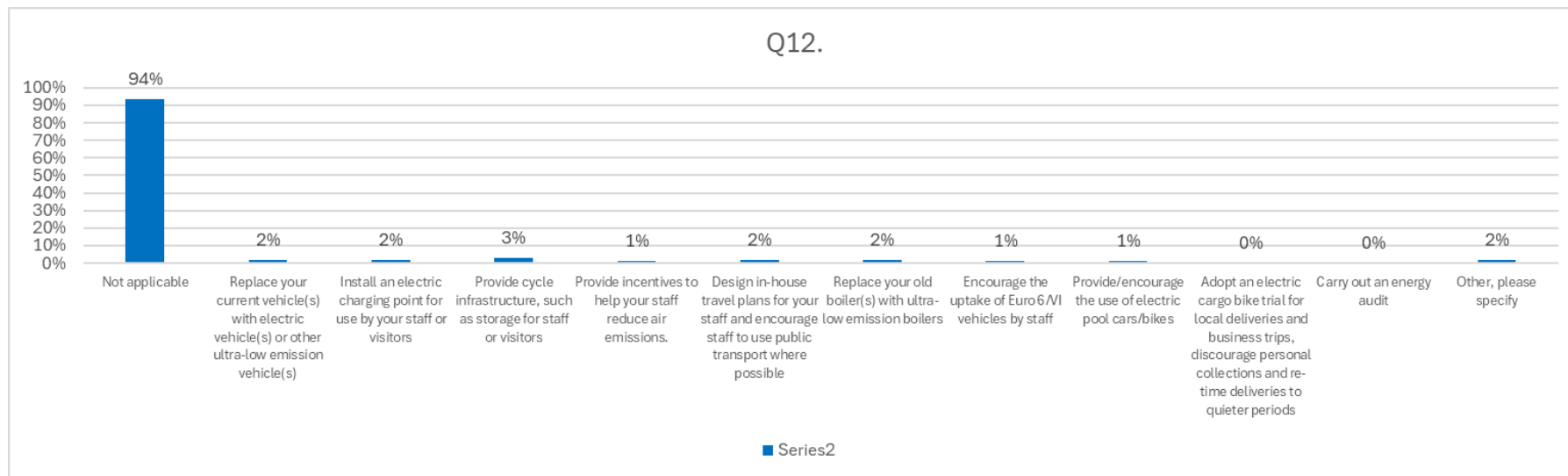
Use a bicycle or walk for local journeys or take the bus as much as possible scored the highest following by participate in an anti-idling campaign.

Open Question Responses:

In the open text comments, respondents used the opportunity to communicate their frustrations/concerns, as well as general ideas about related issues but did not answer the specific question posed.

Q12. Please answer this question if you are responding on behalf of a business / organisation / institution / community group (if not, please select 'not applicable').

What changes are your organisation willing to make to improve poor air quality? (select all which apply)



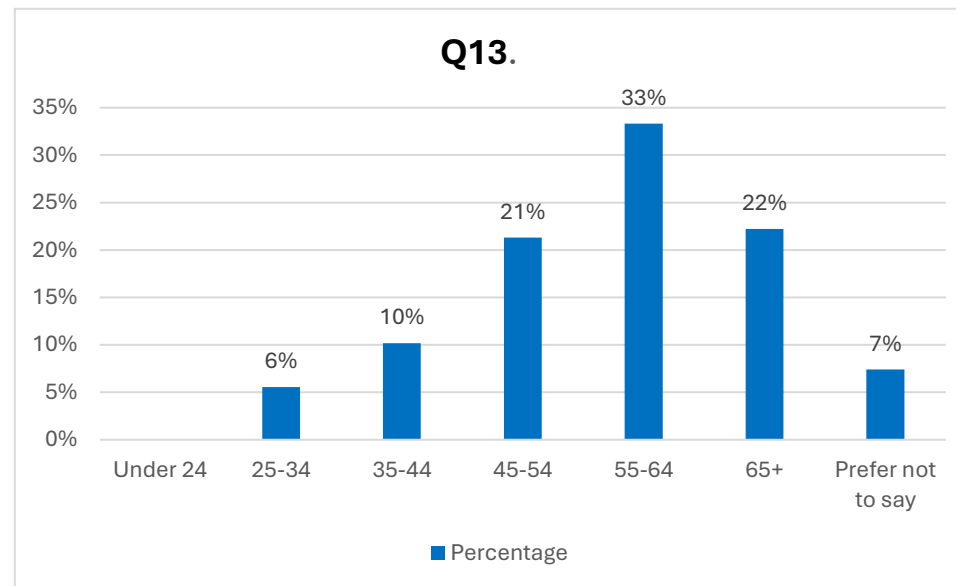
Only 0.6% of respondents were from organisations and most respondents suggested the provision of cycle infrastructure, such as storage for staff or visitors. The following changes were cited in the open text questions to improve air quality: -

1. an attempt to encourage staff to use public transport instead of cars to commute to work – however, a lack of frequency of buses and trains is an issue as to why they will not convert over from cars
2. Provide better public bus service and better cycle paths. Also reduce the cost of some transport prices.
3. Fund a low-cost efficient euro 6 van with 0% Apr over 7 years.

A need of funding and for clearer guidelines and more robust action regarding bonfires in residential areas was requested from the council.

Note: This question is slightly contradictory to the first question which shows that there was no respondent from organisations. This may reflect the fact that some were responding with two hats (i.e.as a person and for their organisation).

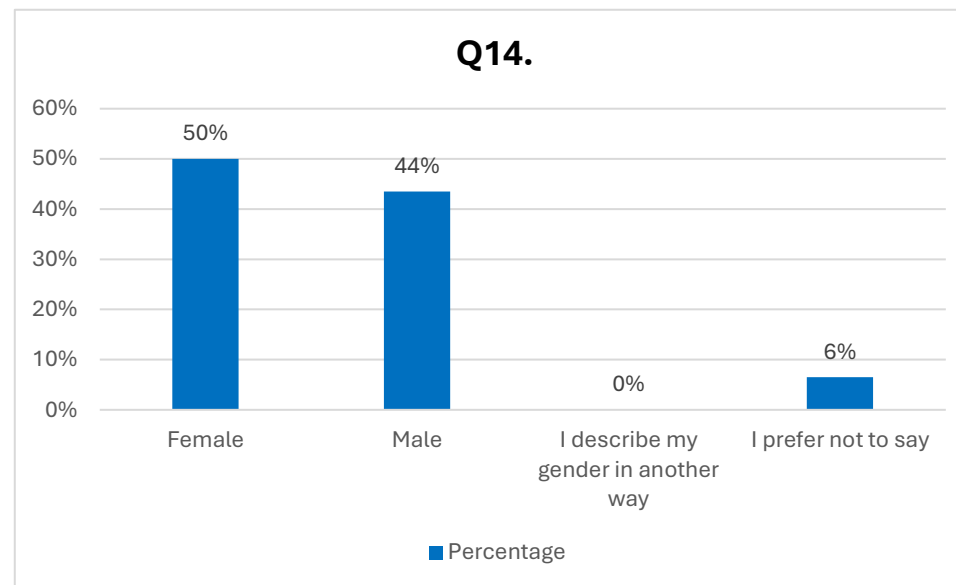
Q13. Please give your age



Spelthorne has a slightly lower population of under-30s (33%) compared to the rest of the country (36%), and a slightly higher population of 30–69-year-olds (53%) compared with the national average of (51%), The number of 70+ is 14%, which is broadly in line with the rest of the nation.

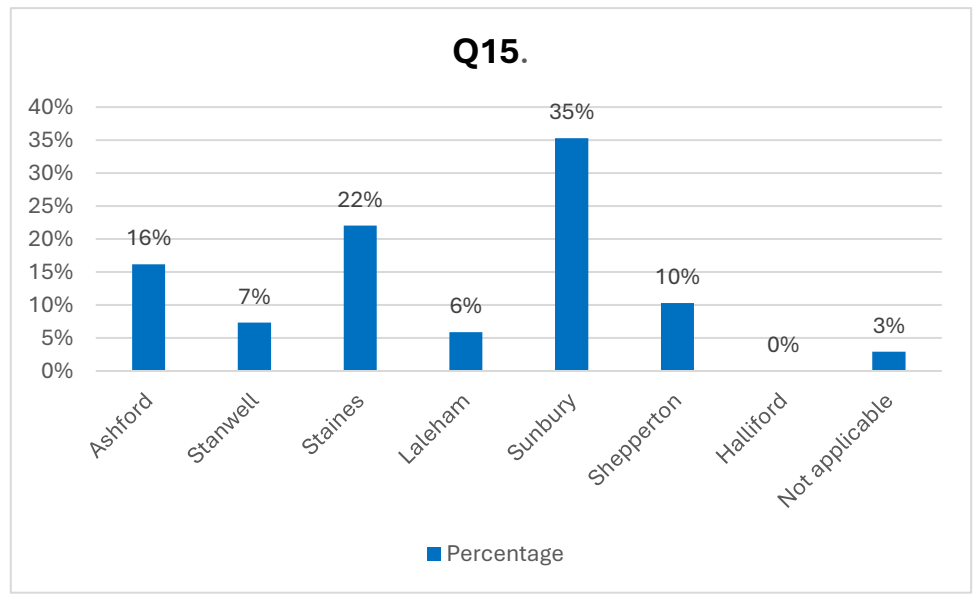
The majority (33%) of respondents were between 55-64 years of age. People aged 25-34 represented the age groups with the lowest (6% for each) proportion of responses. 7% did not state their age. The residual percentage was distributed among other groups.

Q14. Please specify your gender



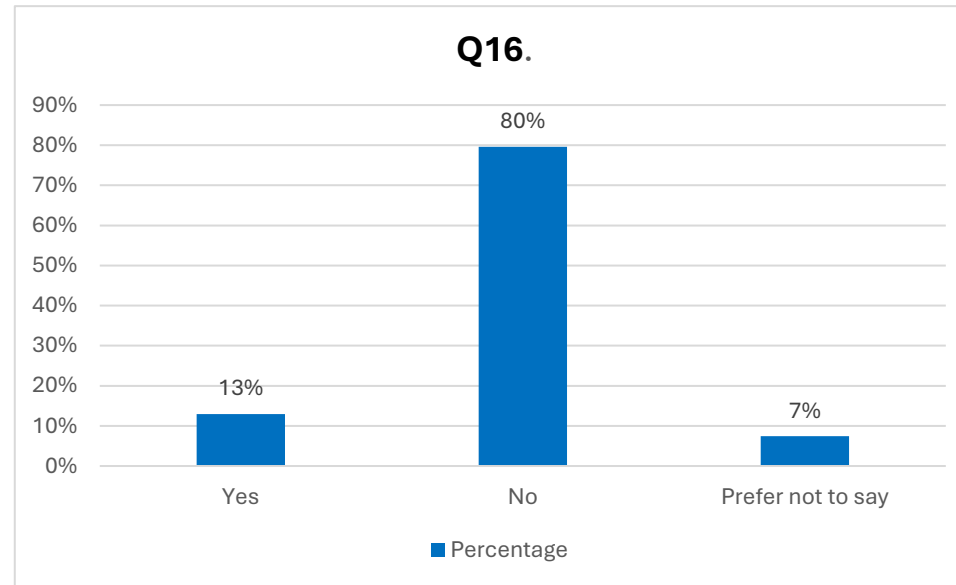
Census data from 2021 show that 50.8% of residents in Spelthorne are female, with the remaining 49.2% being male. There were slightly more female (50%) than male (44%) respondents. Some (6%) did not answer or preferred not to state their gender. These results corroborate very well with the census data which shows more females than men.

Q15. In which part of Spelthorne do you live/work/study/base your business/organisation?



Most respondents were from Sunbury (35%), followed by Staines (22%) and Ashford (16%). This may be due to more representation from their active residential associations.

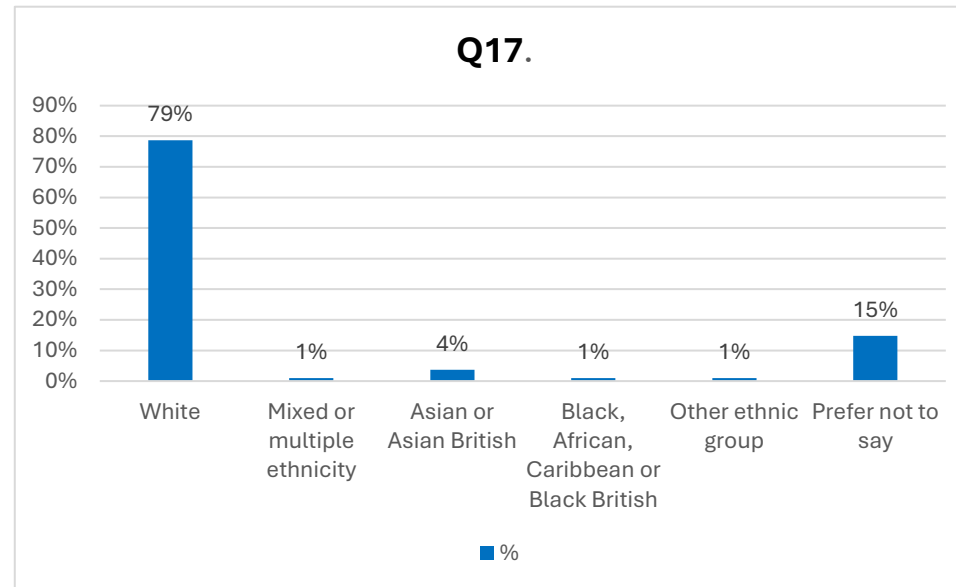
Q16. Do you consider yourself to have a disability?



Spelthorne has a slightly lower percentage of residents with a disability compared to the rest of England and Wales with 14.2% Disabled under the Equality Act compared to 17.7% for England and Wales.

13% of respondents were disabled with 7% preferring not to say. This represents the actual number of disabled in Spelthorne well.

Q17. What is your ethnicity?



The ethnic make-up of Spelthorne is largely in line with the rest of England and Wales, predominantly residents are from a white ethnic background. However, there are slightly more Asian people and those with a mixed ethnic background but fewer people from a black ethnic group compared to the national average.

15% preferred not to state their ethnicities. Of those that did, the majority of respondents (78 %) were white with very few distributed across other ethnic groups (7%).

3. Suggested Changes Made to the AQAP

The following specific changes will be made to the document:

1. In light of SCC's Liveable Neighbourhoods' being renamed 'Local Street Improvements' (LSI's), Measure 16 will be replaced with 'Implement Local Street Improvements in line with SCC Local Street Improvements Programme'.
2. A Measure will be added 'Support and help implement the [Spelthorne Local Cycling and Walking Infrastructure Plan](#)'. This is to recognise the importance of this document in securing funding for walking and cycling infrastructure (which has been recognised through the consultation responses as a barrier to the uptake of active travel). It also ensures consistency with other borough AQAPs in Surrey.
3. In response to Defra suggestions, a new section has been added into the AQAP which outlines the difficulties of quantifying measures within the plan, and where possible includes some quantification of emissions of specific measures. Over time, it may be that data become available (for example on the effect of some of the climate change measures within the plan) which can be quantified into associated NOx and PM emission reductions. This information is then linked to a cost effectiveness table.

In addition, text updates have been made to ensure clarity of the document, or to respond to specific suggestions from Defra (such as the inclusion of population information within the AQMA).

The outcomes of consultation will also be used to assist SBC and SCC in terms of prioritisation of actions for implementation. Responses which are outside of the scope of SBC (such as those relating to Heathrow, or Environment Agency processes, or fall within the remit of Surrey County Council) have been referred to the relevant third party, and in some cases, meetings held to discuss taking forward the outcomes of the consultation.

The AQAP will be reviewed periodically to reflect changing policies, air quality concerns and council priorities, as a minimum every 5 years.

Appendix A Communication Plan & Questionnaires

A. Draft AQAP Questionnaires

Public Consultation Survey

To read the draft Air Quality Action Plan visit

<https://www.spelthorne.gov.uk/article/21746>

Please submit the completed questionnaire no later than

30 June 2024

By post / by hand: Spelthorne Borough Council, Environmental Health/Pollution
Control Council Offices, Knowle Green, Staines, TW18 1XB

By email: Pollution.Control@spelthorne.gov.uk

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RETURN ONLY THE COMPLETE QUESTIONNAIRE BY POST.

PLEASE DO NOT INCLUDE THE ADDITIONAL READING MATERIAL IN THE
POST

1. Which of the following best describes how you wish to respond to this survey?

You must provide an answer to this question.

- As a Spelthorne resident
- As someone who works, studies or visits Spelthorne
- On behalf of a community organisation or charity
- On behalf of an educational establishment
- On behalf of a health establishment
- On behalf of a sports or fitness establishment
- On behalf of a business organisation
- As a Local Authority or Transport Authority
- None of the above

2. On a scale of 1 to 5, how important do you feel the following broad principles will be in dealing with air quality (with 1 being the least important and 5 being the most important)?

Select the most applicable option in each row. You must select an option in every row.

	1	2	3	4	5
Transport planning and infrastructure that supports improving air quality	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Promoting low emission vehicles and providing the infrastructure to support EV charging	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Helping people to make informed travel, health and lifestyle choices by providing information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reducing pollution from the Council's fleet of vehicles	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Education and regulation around burning solid fuels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Facilitating active travel such as walking and cycling in the borough	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Addressing pollution around vulnerable receptors like schools, hospitals and care homes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Addressing air quality around Heathrow Airport	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Increasing air quality monitors across the borough	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. On a scale of 1 to 5, how aware are you of the need to improve and safeguard air quality in Spelthorne (1 being least aware and 5 being very aware)?

	1	2	3	4	5
On a scale of 1 to 5, how aware are you of the need to improve and safeguard air quality in Spelthorne (1 being least aware and 5 being very aware).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4. Air Quality Public Information

There is a need to increase public awareness and support individuals to reduce their personal exposure to air pollution. Were you aware of the following Alert services?

- | | |
|---|---|
| <input type="checkbox"/> Defra Alert services | <input type="checkbox"/> Surrey Air Alert services |
| <input type="checkbox"/> Other services (please give information below) | <input type="checkbox"/> I'm not aware of any of the above services |

If you selected 'other', please give details

5. Awareness and Behavioural Change

Which modes of travel would you consider increasing in your day-to-day activities?

- | | |
|---|---|
| <input type="checkbox"/> Walking | <input type="checkbox"/> Cycling |
| <input type="checkbox"/> Electric vehicle | <input type="checkbox"/> Public transport |
| <input type="checkbox"/> Other | |

If you selected 'other', please give details

6. Awareness and Behavioural Change

Are there any barriers in Spelthorne to the following?

Select the most applicable option in each row. You must select an option in at least 1 row.

	Yes	No
Walking	<input type="checkbox"/>	<input type="checkbox"/>
Cycling	<input type="checkbox"/>	<input type="checkbox"/>
Electric vehicles	<input type="checkbox"/>	<input type="checkbox"/>
Public transport	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>

If you selected 'yes to any of the above, please give details below

7. If you are responding as a Local Authority representative, have you publicised the following types of active travel to your residents?

Select the most applicable option in each row.

	Yes	No
Walking	<input type="checkbox"/>	<input type="checkbox"/>
Cycling	<input type="checkbox"/>	<input type="checkbox"/>
Electric vehicles	<input type="checkbox"/>	<input type="checkbox"/>
Public transport	<input type="checkbox"/>	<input type="checkbox"/>

Other	<input type="checkbox"/>	<input type="checkbox"/>
-------	--------------------------	--------------------------

If you selected 'yes to any of the above, please give

8.

On a scale of 1 to 5, how important do you feel the following proposed categories will be in dealing with air quality (with 1 being the least important and 5 being the most important)?

(Refer to Categories and Measures on Page 13 of this document)

Select the most applicable option in each row. You must select an option in every row.

	1	2	3	4	5
Policy Guidance and Development Control	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promoting Low Emission Plant (such as heat pumps)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promoting Low Emission Transport	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Traffic Management (such as road closures)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transport Planning and Infrastructure (such as cycling lanes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promoting Travel Alternatives (such as walking and cycling)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any additional comments

9. Do you have any suggestions for the following measures? (Refer to Categories and Measures on Page 13 of this document)

Select the most applicable option in each row. You must select an option in every row.

	Yes	No
Policy Guidance and Development Control	<input type="checkbox"/>	<input type="checkbox"/>
Promoting Low Emission Plant (such as heat pumps)	<input type="checkbox"/>	<input type="checkbox"/>
Promoting Low Emission Transport	<input type="checkbox"/>	<input type="checkbox"/>
Public Information	<input type="checkbox"/>	<input type="checkbox"/>
Traffic Management (such as road closures)	<input type="checkbox"/>	<input type="checkbox"/>
Transport Planning and Infrastructure (such as cycling lanes)	<input type="checkbox"/>	<input type="checkbox"/>
Promoting Travel Alternatives (such as walking and cycling)	<input type="checkbox"/>	<input type="checkbox"/>

If you answered yes to any of the above, please give details below

10. Impact of the measures proposed in the draft Air Quality Action Plan (AQAP) (Refer to Page 13 of this document)

Do you have concerns about any of the following?

Select the most applicable option in each row. You must select an option in every row.

	Yes	No
Are you aware of any negative impact of the AQAP on residents or visitors to Spelthorne?	<input type="checkbox"/>	<input type="checkbox"/>
Are you aware of any negative impact of the AQAP on the economy?	<input type="checkbox"/>	<input type="checkbox"/>
<u>Age</u> : Are you aware of any negative impact of the AQAP on this protected characteristic?	<input type="checkbox"/>	<input type="checkbox"/>
<u>Religion or belief</u> : Are you aware of any negative impact of the AQAP on this protected characteristic?	<input type="checkbox"/>	<input type="checkbox"/>
<u>Disability</u> : Are you aware of any negative impact of the AQAP on this protected characteristic?	<input type="checkbox"/>	<input type="checkbox"/>
<u>Gender reassignment</u> : Are you aware of any negative impact of the AQAP on this protected characteristic?	<input type="checkbox"/>	<input type="checkbox"/>
<u>Marriage and civil partnership</u> : Are you aware of any negative impact of the AQAP on this protected characteristic?	<input type="checkbox"/>	<input type="checkbox"/>
<u>Pregnancy and maternity</u> : Are you aware of any negative impact of the AQAP on this protected characteristic?	<input type="checkbox"/>	<input type="checkbox"/>
<u>Race</u> : Are you aware of any negative impact of the AQAP on this protected characteristic?	<input type="checkbox"/>	<input type="checkbox"/>

<u>Sex</u> : Are you aware of any negative impact of the AQAP on this protected characteristic?	<input type="checkbox"/>	<input type="checkbox"/>
<u>Sexual Orientation</u> : Are you aware of any negative impact of the AQAP on this protected characteristic?	<input type="checkbox"/>	<input type="checkbox"/>

If you answered yes to any of the above, please give details below.

11. What lifestyle or behaviour changes would you be willing to make to improve poor air quality? Please tick all which apply

- Replace my current vehicle with an electric vehicle or other ultra-low emission alternatives
- Install an electric charging point at my property if possible
- Walk my child/children to school
- Use a bicycle or walk for local journeys or take the bus as much as possible
- Participate in an anti-idling campaign
- Use a car club rather than purchasing/replacing my car
- Only burn dry, well-seasoned wood or smokeless fuel on your stove, open fire or barbeque
- Get my indoor air quality checked by a professional person and adopt the recommendations to reduce indoor pollution
- Replace my old boiler with ultra-low emission boilers
- Improve my understanding of air pollution by visiting the Council's or other relevant websites regularly
- Other

What can the Council do to help you make these changes?

12.

Please answer this question if you are responding on behalf a business / organisation / institution / community group (please tick all that apply, if not, please select 'not applicable').

What changes is your organisation willing to make to improve poor air quality?
(select all which apply)

Select at least 1 option

- Not applicable
- Replace your current vehicle(s) with electric vehicle(s) or other ultra-low emission vehicle(s)
- Install an electric charging point for use by your staff or visitors
- Provide cycle infrastructure, such as storage for staff or visitors
- Provide incentives to help your staff reduce air emissions.
- Design in-house travel plans for your staff and encourage staff to use public transport where possible
- Replace your old boiler(s) with ultra-low emission boilers
- Encourage the uptake of Euro 6/VI vehicles by staff
- Provide/encourage the use of electric pool cars/bikes
- Adopt an electric cargo bike trial for local deliveries and business trips, discourage personal collections and re-time deliveries to quieter periods
- Carry out an energy audit
- Other, please specify

What can the Council do help you make these change to reduce your emissions and improve air quality?

13.

About you

Please give your age

You must provide an answer to this question.

- | | |
|--|--------------------------------|
| <input type="checkbox"/> Under 24 | <input type="checkbox"/> 25-34 |
| <input type="checkbox"/> 35-44 | <input type="checkbox"/> 45-54 |
| <input type="checkbox"/> 55-64 | <input type="checkbox"/> 65+ |
| <input type="checkbox"/> Prefer not to say | |

14. Please specify your gender

You must provide an answer to this question.

- | | |
|--|--|
| <input type="checkbox"/> Female | <input type="checkbox"/> Male |
| <input type="checkbox"/> I describe my gender in another way | <input type="checkbox"/> I prefer not to say |

15. In which part of Spelthorne do you live / work / study / base your business / organisation?

You must provide an answer to this question.

Ashford

Stanwell

Staines

Laleham

Sunbury

Shepperton

Halliford

Not applicable

16. Do you consider yourself to have a disability?

You must provide an answer to this question.

Yes

No

Prefer not to say

17. What is your ethnicity?

You must provide an answer to this question.

White

Mixed or multiple ethnicity

Asian or Asian British

Black, African, Caribbean or Black British

Other ethnic group

Prefer not to say

Dear Consultee,

Spelthorne Borough Council (SBC) on behalf of all residents, is keen to gather the community' views on some keys actions proposes to improve equality.

This consultation is for all people who reside, work, study and visit the Spelthorne borough area. We will use what you say to inform our final air quality action plan.

We can't guarantee that we will be able to do every that you want us to do immediately due to reason beyond our control. However, we will do all we can to ensure that we listen to your priorities.

Why have we prepared a Draft Air Quality Action Plan (AQAP)?

This 2024-2029 Air Quality Action Plan has been prepared by the council pollution control team in fulfilment of Part IV of the Environment Act 1995 and the Local Air Quality Management System. Further information about air quality in Spelthorne, our current AQAP and annual status reporting can be found on our webpage at <https://www.spelthorne.gov.uk/article/17831/Air-quality>

What does this Draft 2024-2029 Air Quality Action Plan (AQAP) comprise?

Spelthorne Borough Council (SBC) has declared a climate emergency recognising the threat of climate change to the borough and more widely. In the same way that tackling climate change requires actions and lifestyle changes by individuals and organisations', the same is true of improving and safeguarding air quality. SBC are committed to a Climate Change Strategy 2022 - 2030

(<https://www.spelthorne.gov.uk/article/21048/Climate-Change-Strategy-2022-2030>) that will have benefits in also reducing emissions of air pollutants.

SBC are consulting on a draft AQAP, which sets out measures that SBC and stakeholders such as the Transport Authority Surrey County Council intends to take between 2024 and 2029 to help address areas of poor air quality and to safeguard improvements to air quality in the borough. The achievement of our current AQAP is presented in our annual status reports available on our website.

The draft AQAP reflects the sphere of influence of SBC and acknowledges that background air pollutant levels are a significant component of local pollutant concentrations. This is challenging to address because of sources beyond the Council's control, that are outside the borough.

The action plan outlines an ambition to maintain air pollutant concentrations below current air quality objectives and where practicable, reduce emissions further to work towards the more stringent WHO Guideline Values.

Why Are We Consulting You/ Why your views matter?

Poor air quality is bad for everyone, particularly the elderly, young and those with health issues. Air pollution cannot be dealt with by the Council alone. Each person visiting, living and working in Spelthorne has the opportunity to reduce their emissions and their risk of exposure to pollutants. This is an opportunity to have your say on the plan.

Your views are important to shape the action plan. Consultation feedback will be used to:

- Make any necessary amendments to the action plan.
- Provide a more specific steer and direction to the measures.
- Inform stakeholders of public opinion regarding the changes needed to improve local air quality including where targeted support may be needed for certain locations.

What priority actions are we proposing within this Draft 2024-2029 AQAP?

This will be achieved by implementing a suite of measures which fall into the following priority areas:

- 1. Effective collaboration with all stakeholders including:**
 - **Transport Authority Surrey County Council:** to ensure that wider transport measures are delivered, in particular to increase the use of active travel and public transport, reduce the use of private vehicles, and to increase the proportions of low and zero emission vehicles where modal shift is not feasible.
 - **Heathrow Airport Ltd:** to address emissions associated with the airport operations.
 - **Other stakeholders:** neighbouring London Boroughs and with wider stakeholders such as National Highways and the Environment Agency within to reduce emissions of particulate matter and NOx from a range of sources within and out with the borough.
- 2. Air Quality Monitoring.** Maintain and increase our monitoring network in accordance with guidance from Defra.
- 3. Health Education & Awareness.** To continue to provide a service to residents who wish to receive an alert when local air quality is predicted to deteriorate. The alert service helps individuals with health vulnerabilities to air pollution, to understand when the air quality will worsen which can help with avoiding strenuous activity during these periods, and with management of medication.
- 4. Climate Change & Air Quality.** The primary local air pollution source that is contributing to elevated nitrogen dioxide concentrations at the roadside within the Air Quality Management Area is traffic.
- 5. Education & Behavioural Change.** Journeys to school are a significant proportion of vehicle trips in the morning peak across Surrey. Reducing the use of private vehicles for journeys to school will be necessary to improve air quality and tackle climate change.
- 6. Contribution to the Corporate Plan:** It is recognized that the expense of public transport is a challenge for Spelthorne, SBC committed in the Corporate Plan

to support the Spelthorne in the Zone Campaign to lobby for inclusion of Spelthorne in Transport Zone 6.

Expansion of Smoke Control Areas: Spelthorne already has Smoke Control Areas in place covering the majority of the borough that limit the kind of solid fuels that can be burnt and require new solid fuel appliances to meet criteria set by Defra:

([https://uk-](https://uk-air.defra.gov.uk/sca/#:~:text=A%20smoke%20control%20area%20is%20an%20area%20where,are%20approved%20for%20use%20in%20smoke%20control%20areas%29)

[air.defra.gov.uk/sca/#:~:text=A%20smoke%20control%20area%20is%20an%20area%20where,are%20approved%20for%20use%20in%20smoke%20control%20areas%29](https://uk-air.defra.gov.uk/sca/#:~:text=A%20smoke%20control%20area%20is%20an%20area%20where,are%20approved%20for%20use%20in%20smoke%20control%20areas%29))

Spelthorne will start the process to expand the coverage of Smoke Control Areas to cover the whole borough subject to approval via the Council's Political Committees.

What categories/measures are we proposing within this Draft 2024-2029 AQAP?

Categories	Measures
<p>1. Policy Guidance and Development Control</p>	<p>1. Work within the structure of the planning system to reduce emissions of pollutants from new development. This will include implementing any new requirements for reducing PM2.5 through planning which are likely to be in place within the timeframe of this plan.</p>
	<p>2. Establishment of a Climate Change Working Group.</p>
	<p>3. Update the Surrey-wide Air Quality Modelling which was completed in 2019 to incorporate up to date input data.</p>
	<p>4. Develop a Green Infrastructure strategy to support the Local Plan.</p>
	<p>5. To investigate the feasibility of introducing Air Quality Supplementary Planning Guidance.</p>

Categories	Measures
	6. Increase Spelthorne Smoke Control Area to cover the whole borough.
	7. Continue collaboration with Heathrow Airport Ltd to reduce emissions arising from the operation of Heathrow Airport.
	8. Promote access to grant funding for renewable energy installations for residents including Solar Together.
2. Promoting Low Emission Plant	9. Incorporate energy efficiency measures and renewables into conversions, refurbishments, and maintenance of Council buildings and housing developments.
	10. The Council will work with Knowle Green Estate and suppliers to promote retrofit, insulation, energy efficiency and adaptation measures.
3. Promoting Low Emission Transport	11. Lobby for and support any future measures by Transport Authorities to encourage and facilitate the use of low emission buses in Spelthorne.
	12. Converting 50% of the Council fleet to electric or hydrogen by 2028 as stated in SBC's response to the Climate Emergency.
	13. To investigate the feasibility of producing annual emissions data for the Councils fleet vehicles in line with the Council's Climate Change Strategy.
	14. Investigate the feasibility of introducing emissions-based parking tariffs.

Categories	Measures
	15. Promote the use of "cleaner technology and fuels" within Spelthorne.
	16. Deliver EV taxi programme to encourage taxi companies and drivers to invest in electric fleets.
4. Promoting Travel Alternatives	17. Continue to implement Cycling for Health.
	18. Likeability School Cycling Proficiency training and Feet First Walking Training.
	19. Continue to implement Walking for Health.
	20. Continue to implement School and Business Travel Plans.
	21. Support work on the Health and Wellbeing Strategy.
	22. Continue to promote sustainable transport/ homeworking with staff to reduce travel and explore schemes offering Council employees alternatives to private vehicle use.
5. Public Information	23. Supporting air quality research and providing public information regarding air quality, including an air alert for vulnerable members of the population
	24. Continue to lobby at national /regional level for the legislation changes needed and on the big strategic

Categories	Measures
	infrastructure decisions such as Heathrow Airport's third runway and changes to the regulation and operation of UK airspace.
	25. Raising awareness of poor air quality and the associated health implications. NHS Ask About Asthma campaign.
	26. To continue to fund a comprehensive air quality monitoring network including automatic monitoring of PM10 and PM2.5. 27. Refresh bonfires and anti-idling campaign.
6. Traffic Management	28. Implement further Liveable Neighbourhoods, or similar schemes.
	29. Support Traffic Management interventions to reduce road traffic emissions either through smoothing traffic flow or reducing vehicle use.
7. Transport Planning and Infrastructure	30. Junction improvements to increase capacity and improve road layouts linked to new developments.
	31. Promoting Alternative Travel - Delivery of bus priority measures, cycle parking and interchange opportunities.

How can you help?

The best way to have your say is to complete our questionnaire online at <https://spelthorne.inconsult.uk/AQAP>. Alternatively, you can submit your complete questionnaire no later than 30 June 2024 at 6pm in the following ways:

- **by post:** Spelthorne Borough Council, Environmental Health/Pollution Control Council Offices, Knowle Green, Staines, TW18 1XB
- **by email:** Pollution.Control@spelthorne.gov.uk
- **by hand:** Spelthorne Borough Council, Environmental Health/Pollution Control Council Offices, Knowle Green, Staines, TW18 1XB

What are the next stages following consultation?

- We began 6-week Statutory consultation- from 20 May 2024 to 30 June 2024
- Feedback from the consultation will be considered and put to Defra for approval - Sep 2024
- We will then seek committee approval of the final plan - Sep 2024

Privacy Notice - Consultations on the draft Air Quality Action Plan (2024 – 2029)

Spelthorne Borough Council would like to collect your data and consultation responses in order to consult on the draft Air Quality Action Plan (2024-2029)

In order to comply with the Data Protection Act and General Data Protection Regulations, Spelthorne Borough Council must provide you with the following information about the personal data you give to us:

- our legal basis for processing your personal data is Legal Obligation.
- the consultation has been designed to collect the minimal amount of personal data to achieve the purpose. For the online consultation software the following additional information will be collected: email, an IP address, and a cookie identifier.
- the Council will use the data provided to shape the measures in the Air Quality Action Plan.
- your information will be stored on the Council's consultation system. The Council uses consult.spelthorne.gov.uk/ which is a web-based consultation application, based in the UK. Your information is collected and kept by this application when you take part in a consultation, and relevant information shared with the Pollution Service. There is further information available to you in the terms and conditions on www.spelthorne.gov.uk/cookies.
- Some of your personal information may be passed on to a consultant employed by the council to assist with the Plan.
- Personal data will not be shared with any other third parties, or transferred out of the UK, a summary response will be sent to statutory stakeholders.
- The responses to the consultation will be retained for a maximum of 6 years from the date of the publication of the Air Quality Action Plan.

If you have any concerns or queries about how we collect your data, please contact Spelthorne Borough Council's Data Protection Officer at data.protection@spelthorne.gov.uk

For further information about how the Council uses your personal data, including your rights as a data subject, please see below.

You have the following rights:

- you have the right to be informed via Privacy Notices such as this,
- you have the right to request access to and to receive a copy of any information we hold about you (including in an electronic format) - to request a copy of this information you must make a subject access request in writing,
- if you find that the information Spelthorne Borough Council holds about you is no longer accurate, you have the right to ask to have this corrected,
- you have the right - under certain conditions - to ask us to erase your personal data,
- you may request that Spelthorne Borough Council stops processing your personal data in relation to any council service (this may delay or prevent us delivering a service to you, we will seek to comply with your request but may be required to hold or process information to comply with our legal duties).

If you have any direct enquiries or if you wish to exercise any of these rights contact the Data Protection Officer at data.protection@spelthorne.gov.uk.

You also have the right to make a complaint to the Information Commissioner's Office (ICO). This is an independent body responsible for making sure that organisations comply with Data Protection legislation.

The ICO will always expect you to have raised your concerns with us before submitting a complaint.

B. AQAP Communication Plan

❖ Introduction

For Spelthorne Borough Council to comply with statutory requirements it is necessary to update the Air Quality Action Plan every five years. Therefore, it is necessary to deliver an updated plan from 2024. The AQAP is also a core part of the Council's ambitious plans to be carbon neutral by 2030, as laid out in Spelthorne's Climate Emergency Action Plan.

It is a legal duty under the Environment Act 1995 and the LLAQM Framework to consult specific parties and agencies during the development of any air quality strategies and action plans. The following SBC parties are engaged during the process.

- All internal stakeholders within the council
- The Secretary of State, Residents, Local MPs and Council Members
- The Environment Agency
- Surrey County Council
- All neighbouring local authorities,
- Air quality working groups or any other relevant groups
- Greater London Authority / Transport for London
- Bodies representing local business interests (e.g. Chamber of Commerce and Enterprise) and other organisations such education providers, charities, local community groups and health care providers.

Following the planned consultation exercise, the final and updated plan will be signed off by Defra and the Environment and Sustainability Committee.

Spelthorne Borough Council has identified air quality as a priority for the borough in the Corporate Plan 2024 under the Environment priority "work with our residents, suppliers and partners to minimise our impact on the environment"

This project fits into the Climate Change Strategy 2022 - 2030 that Spelthorne Borough Council is committed to which will have benefits in reducing emissions of air pollutants.

We will work closely with Spelthorne's diverse communities to produce a challenging and actionable plan for reducing air pollution in Spelthorne over the next five years.

This communications plan compliments the plan used for engaging the community on the development of the Air Quality Action Plan and the consultation of the Draft AQAP.

❖ **Communication and Engagement Objectives**

During the AQAP consultation: Our communications and engagement plan aims to:

- The council is producing a new Air Quality Action Plan which will outline its policies and ambitions to improve air quality in the borough over the next five years.
- Schedule 11 of the Environment Act 1995 requires the Council to consider any representations made in accordance with the consultation. Therefore, public consultation was carried out between Monday 20 May 2024 to Sunday 30 June 2024.
- The Council has a statutory duty to engage and consult with residents and local businesses on its action plan
- Over and above that statutory duty, we want to reach out and get the views of as many local people as we can.
- Engaging with residents and businesses about our plan is a core part of the AQAP and is necessary for it to involve local people and, with their support, succeed.

AQAP Adoption and Implementation: Our communications and engagement plan aims to:

- Encourage Spelthorne's diverse residents, businesses, staff and members to note the adoption of the Final Air Quality Action Plan
- Increase air pollution awareness amongst residents
- Share information with residents, businesses, staff and members about air pollution - its sources and impact

❖ **Communication and Engagement Approach**

Development of draft Air Quality Action Plan is done in a systematic approach in the following stages:

- Stage 1: Establishing the baseline air quality
- Stage 2: Developing options to address air quality
- Stage 3: Considerations during the development (Air quality improvements, wider impacts, cost, effectiveness, perceptions and practicality)
- Stage 4: Prioritise the options and draft the action plan, involving colleagues, agencies and wider stakeholder
- Stage 5: Public consultation to help shape and finalise the action plan
- Stage 6: Finalise action plan and publicise.

❖ SBC Stakeholders

As part of Stage 4, the draft AQAP was prepared by Spelthorne Borough Council with the support and agreement of Spelthorne Borough Council’s internal departments and wider stakeholders.

The stakeholders for the public consultation are as follows:

Internal Stakeholders

- Strategic Planning Team
- Environmental Health Team

- Leisure Team (health and wellbeing and active travel)
- Climate Change and Sustainability Team
- Neighbourhood services/fleet Team
- Spelthorne Borough Council Staff

- Members

External Stakeholders

- Transport (Surrey County Council) *
- Public Health (Surrey County Council) *

- Heathrow Airport Limited *

- National Highways *

- Environment Agency *
- Neighbouring authorities (Houslow, Richmond-upon-Thames, Hillingdon, Elmbridge, Runnymede, Slough) *
- Transport for London *
- Spelthorne Residents, community groups, residents’ associations
- Businesses

- Local nurseries, primary schools, secondary schools, colleges and universities
- Hospitals, pharmacies all health professionals
- Cluster Group

- Community groups

Internal Stakeholders

External Stakeholders

- Volunteering organisations
- Charities
- Environmental groups and churches
- Youth clubs

* indicates statutory
stakeholders

❖ Communication Channels

The following are the Spelthorne Borough Council's existing corporate communication channels to disseminate the Draft AQAP.

Actions & Channel	Lead Contact	Final Action / Completed
1. Create AQAP consultation pack	All	15/05/2024
2. Spelthorne Borough Council website: Create online page for consultation on AQAP. Press release were added to the website Graphic for the website homepage news box	Comms	Completed 21/05/2024
3. Consult third party and brief Cllr.	EH	15/05/2024
4. Final AQAP consultation pack	All	14/05/2024
5. Social media: Facebook (8000 followers), Twitter (5,500 followers) and Instagram (2,200 followers). Press release was sent to media contacts and social media posts added to Facebook, X, Nextdoor and Instagram	Comms	21/05/2024
6. Spelthorne noticeboards. Posters placed on 21 community noticeboards	Comms	21/05/2024
7. Make questionnaires available in community centres, libraries, community hubs (full contact list was available). Print up supporting copies of consultation with pre-paid envelopes and make available at 8 libraries (Run of 10 copies per location)	PO/ EH	20/05/2024

Actions & Channel	Lead Contact	Final Action / Completed
8. Contact and encourage stakeholder groups, to take up the consultation message and cascade use on their own media channels	Pollution Control (PC)	20/05/2024
9. AQAP consultation launches	All	20/05/2024
10. Emails statutory consultees via the pollution control inbox.	PC	20/05/2024
11. Cascade via CCG to health services	PC to PH	20/05/2024
12. Press release to local newspapers	Comms	20/05/2024
13. Use resident e-newsletter to spread message. This can used more than once during six-week lifetime of consultation. This was added to enewsletter sent at end of May.	Comms	31/05/2024
14. Use council blogs to encourage residents, businesses, etc.	Comms	31/05/2024
15. Use staff e-newsletter to engage with council workers (also Intranet)	Comms	31/05/2024
16. Social media posts across Facebook, Instagram, Twitter, etc., across life of six-week campaign. Press release sent to media contacts and social media posts added to Facebook, X, Nextdoor and Instagram.	Comms	31/05/2024
17. Use internal communications to inform cllrs directly	Comms	20/05/2024

Actions & Channel	Lead Contact	Final Action / Completed
18. Advertise consultation on the digital screens in the Elmsleigh Centre and Staines High Street: Graphics were added to digital screens in the Elmsleigh Centre and Staines High Street	Comms	21/05/2024
19. Consultation closes on 30 June 2024	All	30/06/2024

❖ Anticipated Key messages

Key messages for the air quality action plan consultation are presented in the following table. Post consultation messaging will be project specific.

Channel	Message during the AQAP consultation
SBC Website	www.spelthorne.gov.uk/AQAP
Social media	<p>Reducing air pollution is vitally important to the local health and environment. All councils have a duty to monitor local air quality to make sure it meets certain standards. SBC monitor air quality in several locations across the area.</p> <p>People across Spelthorne are being invited to have their say on proposals to address air quality concerns and improve standards across the area.</p>

Channel	Message during the AQAP consultation
	<p>SBC is in the process of developing Air Quality Action Plan or AQAP available at www.spelthorne.gov.uk/AQAP which outlines the steps it will take to work towards improving air quality and reducing air pollution.</p> <p>Have your say on our AQAP 2024-2029 by completing the questionnaire available at www.spelthorne.gov.uk/AQAPConsultation</p> <p>Your response will take approximately 2-3min of your time.</p>
Statutory consultation via the pollution control inbox	<p>We are very keen to get your views on the measures and actions included in our Draft air quality action plan available at www.spelthorne.gov.uk/AQAP</p> <p>Your feedback will help us to refine the measures in the AQAP. Please complete our questionnaire online at Spelthorne Residents' Survey 2024 - Spelthorne (inconsult.uk)</p> <p>Your response will take approximately 2-3min of your time.</p> <p>Do feel free to share this correspondence with any interested party.</p>
Cllr	<p>Addressing poor air quality is crucial for public health and environmental well-being. Efforts to reduce emissions and improve air quality is important <u>and will be of benefit to the health of</u> everyone who lives and works in the borough.</p> <p>Our new Corporate Plan (2024-2028) aims to work with our residents, suppliers and partners to minimise our impact on the environment and achieve our Council goal of 'net zero' carbon emissions by 2030 and to maintain a clean and attractive Borough which supports biodiversity.</p>

Channel	Message during the AQAP consultation
	<p>The new Air Quality Action Plan (2024-2028) sets out in 7 categories, subdivided in 31 measures as detailed on the following link www.spelthorne.gov.uk/AQAP</p> <p>The measures reflect the priorities of SBC which focus primarily on strategic measures, including those to reduce emissions from traffic through modal shift to active travel, those working in the longer term to reduce the need to travel, delivery of actions to increase low and zero emission vehicles in the fleet, raising awareness and reducing emissions from commercial and domestic heating sources.</p> <p>Joint effort is key to deal with Air quality. Each and every individual living and working in Spelthorne have the opportunity to collaborate with the Council to achieve these measures and improve their emission contributions and risk of exposure to pollutants.</p> <p>Your feedback will help us to refine the measures in the AQAP. Please complete our questionnaire online at www.spelthorne.gov.uk/AQAPConsultation</p>
News release	<p>Consultation: Air Quality Action Plan 2024-2029</p> <p>Spelthorne Borough Council is consulting on its Air Quality Action Plan which outlines the actions it plans to take to improve air quality in the Borough over the next five years.</p> <p>The consultation will run from Monday 20 June until 6pm on Sunday 30 June.</p> <p>Cllr Malcolm Beecher, Chair of Spelthorne Borough Council's Environment and Sustainability Committee, said: "Addressing poor air quality is crucial for public health and environmental wellbeing. Efforts to reduce emissions and improve air quality is important and</p>

Channel	Message during the AQAP consultation
	<p>will be of benefit to the health of everyone who lives and works in the Borough.</p> <p>“Joint effort is key to dealing with air quality. Each and every individual living and working in Spelthorne have the opportunity to collaborate with the Council to achieve these measures and improve their emission contributions and risk of exposure to pollutants. Please take the time to gives us your views on the actions we have planned.”</p> <p>To read the Air Quality Action Plan and take part in the consultation, visit https://spelthorne.inconsult.uk/AQAP before 6pm on Sunday 30 June.</p> <p>For more information including FAQs about the consultation, visit www.spelthorne.gov.uk/AQAP</p> <p>To request a printed copy of the consultation, email pollution.control@spelthorne.gov.uk or call 01784 446443.</p>

❖ Evaluation

AQAP Consultation

The public consultation will be monitored for responses.

The success of the communication plan will be measured by:

- Number of residents receiving communications
- Number of website/portal/social media hits
- Completion of the final consultation responses and update of the draft AQAP

❖ Post Consultation & During the Implementation

Milestone	Date
<ul style="list-style-type: none"> • Air Quality Action Plan public consultation 	20 May -30 June 2024
<ul style="list-style-type: none"> • Engagement with different stakeholders and AQAP results reporting 	July 2024
<ul style="list-style-type: none"> • Modification of plan post consultation 	Early September 2024
<ul style="list-style-type: none"> • Engagement with different stakeholder on the final AQAP 	Early November 2024
<ul style="list-style-type: none"> • Submission to Defra for approval 	10 October 2024
<ul style="list-style-type: none"> • First finalised Draft AQAP 	28 October 2024
<ul style="list-style-type: none"> • Circulate with GHs and Managers for feedback 	31 October 2024
<ul style="list-style-type: none"> • Submit final report to Committee Services to go to MAT 	08 November 2024
<ul style="list-style-type: none"> • MAT 	12 November 2024
<ul style="list-style-type: none"> • E&S Chair Briefing 	19 November 2024
<ul style="list-style-type: none"> • Submission to Defra 	30 November 2024
<ul style="list-style-type: none"> • E&S 	03 December 2024
<ul style="list-style-type: none"> • Adoption and publication of AQAP 	December/January 2025
<ul style="list-style-type: none"> • Monitoring prior/during/post implementation. Every year on behalf of the council, the pollution control team writes and Annual Status Report which has to be submitted to DEFRA for review and approval. • (An Annual Report to provide a full summary of the continuous and diffusion tube monitoring data and a comparison with the air quality objectives). 	Every calendar year

<ul style="list-style-type: none">• We will use Air quality project specific communication plans.	
<ul style="list-style-type: none">• Regular meeting to occur to review the plan. (Plan to be overseen by the AQ working group). <p>Note: Collaborative working and effective communication is of paramount importance)</p>	To be finalised

Appendix B Detailed Responses

1. STATUTORY CONSULTEE RESPONSES

THE SECRETARY OF STATE (DEFRA)

Air Quality Action Plan Appraisal Report

The Air Quality Action Plan (AQAP) sets out information on air quality obtained by Spelthorne Borough Council (SBC) as part of the Review & Assessment process required under the Environment Act 1995 (as amended by the Environment Act 2021) and subsequent Regulations.

The Draft AQAP sets out actions to improve air quality in SBC between 2024 and 2029, superseding the previous AQAP which ran from 2005. An Air Quality Management Area (AQMA) was declared in 2003 encompassing the entire borough due to exceedances of the annual mean NO₂ objective. However, in 2024 SBC submitted the amendment to reduce the AQMA size to cover the major roads and urban areas of the borough only to reflect where hotspots now occur.

An outline of current air quality in SBC has been provided, though no data is reported. There was one monitoring site which recorded a concentration above the annual mean NO₂ objective in the AQMA in 2022, occurring on a major road leading to Heathrow and the M25, although it should be noted the monitoring site is not located at relevant exposure. The distance corrected concentration for this monitoring site is not provided.

The AQAP considers the public health context, citing 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. The Public Health Outcomes Framework has been referenced, with the indicator of fractional mortality attributable to particulate matter in SBC quoted at 6.8%, which is above the Surrey and national values. SBC intends to have the AQAP complement County level work on a Joint Strategy Needs Assessment and a Health and Wellbeing Strategy for Surrey. A Diversity and Equality Impact Assessment has been submitted alongside the AQAP.

SBC have briefly discussed their current Local Plan from 2009; a 2022 to 2037 draft local plan is in progress which will include policies for climate emergency and designing places, as well as policy E4 which directly mentions air quality, requiring developments to be assessed for air quality and be 'air quality neutral'. Other relevant planning and policy documents have been outlined, including the Climate Change Strategy and Action Plan, Local Transport Plan and Electric Vehicle Infrastructure Plan.

SBC have discussed Heathrow's Sustainable Growth Strategy – Heathrow 2.0. The airport is not within the borough boundaries, but SBC continues to engage with

Heathrow on air quality concerns via membership of the Council for the Independent Scrutiny of Heathrow Airport (CISHA) Air Quality Working Group.

The AQAP discusses two source apportionment exercises relevant to SBC. The most recent study was undertaken in 2022 to support the AQAP, considering NO_x at three worst-cast receptors in six study areas within SBC based on 2019 data. The study areas are Sunbury, Staines, Georgian Close, Ashford, Lower Halliford – Shepperton and Moor Lane. The source apportionment generally found the largest proportion of NO_x is background concentrations, ranging from 30% - 68%. The methodology to determine the contribution of background sources is not discussed in detail within the AQAP and it is not clear at which locations the largest proportion of NO_x is background is found. Of road NO_x emissions, diesel cars were generally the largest contributors.

The year of estimated compliance is given for the individual study areas. Five of the six areas are calculated to be compliant in 2022 or prior from the 2019 base. It is not clear whether this compliance is assessed against 40 µg/m³ or 36µg/m³ (i.e. 10% of the objective). This appears to generally align with monitoring data. The discussion of the remaining Moor Lane study area indicates there remains an exceedance at a residential receptor in 2019, though it is not clear when compliance is predicted to be achieved here with or without measures from the action plan.

SBC also discusses earlier CERC work conducted in 2019 on a base year of 2017 as part of a wider modelling study across Surrey, which included a source apportionment exercise. This work indicates that at most roadside monitoring sites, road traffic is the largest source of NO_x emissions. Of which, diesel cars are on average the greatest contributor (38%) followed by LGVs (35%). The CERC study also considered source apportionment of particulate matter emissions, which SBC have summarised.

The required reduction in NO_x emission to meet air quality objectives has not been calculated as the source apportionment modelling calculates compliance to already be achieved in 2022. SBC states this is supported by monitoring data which shows only one site above 40 µg/m³, but only prior to distance correction. The distance corrected concentration is not provided.

Five priorities have been outlined which are integrated into the development of the measures within the AQAP: -

- 1. Priority 1 – to maintain air pollutant concentrations below current air quality objectives and where practicable, reduce emissions further to work towards WHO Guideline Values.*
- 2. Priority 2 - to work collaboratively with SCC to ensure that wider transport measures are delivered, in particular to increase the use of active travel and public transport and reduce the use of private vehicles, and to increase the proportions of low and zero emission vehicles where modal shift is not feasible.*

3. *Priority 3 – work collaboratively with Heathrow Airport Ltd to address emissions associated with the airport operations.*
4. *Priority 4 – to work collaboratively within SBC, across Surrey, with neighbouring London Boroughs and with wider stakeholders such as national Highways and the Environment Agency to reduce emissions of particulates and NO_x from a range of sources within and out with the borough; and*
5. *Priority 5 – report on an annual basis to Defra the implementation of the measures set out in this report, as well as monitored concentrations within the AQMAs.*

A total of 31 measures have been drafted in the AQAP. The measures considered most likely to bring about direct air quality impacts are interventions to reduce road traffic emissions from smoothing traffic flow or reducing vehicle use; and junction improvements to increase capacity and improve road layouts linked to new developments. However, both these measures are vague and limited information is given. The other measures listed are considered commensurate with the concentrations assessed. SBC are focusing on wider, more strategic measures as opposed to localised hotspots, which is aligned with the source apportionment indicating a significant background component to NO_x concentrations.

No evidence of quantification of measures has been provided, thus it is challenging to determine the overall impact on air quality the implementation of the AQAP measures could be predicted to have on the borough. There is also no discussion of any cost benefit analysis of individual measures.

Consultation and stakeholder engagement on the draft AQAP is underway, albeit with limited concrete details or timelines provided. SBC have confirmed responses will be provided in the final version. Details of the composition of the steering group established to take the AQAP forward have been provided, though it is not clear when and how frequently the steering group will meet. SBCs plan for how compliance would be maintained is not outlined.

Defra recommends that Directors of Public Health approve AQAPs. Sign off is not a requirement, however collaboration and consultation with those who have responsibility for Public Health is expected to increase support for measures to improve air quality, with co-benefits for all. Please bear this in mind for the next annual reporting process.

The AQAP is considered acceptable as a draft, on the proviso the comments outlined below should be addressed in the final version of the AQAP. The recommended improvements must be implemented for the final AQAP to be accepted.

Commentary

1. *SBC have discussed current air quality within the borough. Exact concentrations for 2022 are not reported, besides within Figure X. This can be hard to read.*
2. *Additionally, there is one monitoring site with a concentration above 40 µg/m³ in 2022, but this is reported to be below the annual mean NO₂ objective after distance correction. The level of exceedance prior to distance correction, and the distance corrected concentration for this monitoring site, should be reported for clarity. The concentration of the site would determine the validity of retaining the AQMA and therefore the need for the AQAP. If the concentration at relevant exposure is within 10% of the objective or has been compliant for less than three consecutive years, the AQMA should be retained. For more information see [LAQM FAQ 142](#) or contact the LAQM Helpdesk.*
3. *Both diffusion tube results and dispersion modelling are known to have a margin of error within their reported concentrations. As such, any decision making should account for this and Defra recommends that a confidence threshold of 10% be used when seeking to determine whether to revoke an AQMA. In practice, this means that predicted annual mean concentrations of NO₂ from modelled results should be judged against a 36 µg/m³ limit for determining compliance. This is set out in [LAQM FAQ 142](#). It is stated within the draft AQAP that the study completed in 2022 by Ricardo as part of the source apportionment exercise shows concentrations would achieve compliance by 2022 at all modelled locations. It should be confirmed whether this is below the Air Quality Objective of 40 µg/m³ or the 10% confidence value of 36 µg/m³.*
4. *None of the measures presented within the AQAP have had their impact on air quality quantified. As per paragraph 2.85 of LAQM Technical Guidance (TG22), an AQAP must contain quantification of the impacts of measures as a minimum. This could be aided by dispersion modelling or using the Emissions Factors Toolkit for road traffic emissions.*
5. *As a result of this omission, it is difficult to determine the likely improvements that are predicted to arise from the implementation of the AQAP. The action plan does not state whether the implementation of measures will result in the objective being obtained, though it is recognised there are currently no exceedances within either AQMA at relevant exposure. The plan must also address how the local authority intends to ensure compliance is maintained.*
6. *As per section 2.22 of LAQM.TG(22), the AQAP is recommended to include the population within the AQMA area.*
7. *Discussion surrounding the public health and policy context is considered sufficiently detailed. SBC also examined air quality through a broad lens, considering wider regional factors, such as Heathrow airport strategies, actions by nearby Guildford Borough Council, as well as the impact of introduction of ULEZ in London Boroughs neighbouring SBC. This is welcomed, demonstrating SBC's co-operation with external groups.*

8. *A source apportionment study has been undertaken in 2022, with the action plan also reporting on a similar source apportionment work conducted by CERC in 2019. Some improvements which could be made to the reporting of this work in the AQAP are:*
 - a. *The 2022 source apportionment was completed for six study areas. It may be clearer to present the information in a table to allow for easier comparison and understanding of results. For example, to see the degree to which certain areas are more dominated by background sources vs road traffic sources.*
 - b. *The 2022 source apportionment indicates background sources as the greatest contributor, whilst the 2019 work suggest the largest proportion of emissions can be attributed to road traffic. This discrepancy should be explored further; it is not clear whether there has been a genuine change in emission sources over the time passed between both studies, or if there is a difference in methodology (e.g. different sites used).*
 - c. *The text states it is likely that since 2017, the proportion of diesel cars has reduced and LGVs may have increased. The reasons for this should be detailed as this could affect the measure derivation.*
 - d. *The methodology of both studies are not clear and thus it is difficult to determine if this has been completed in line with LAQM.TG(22). This could be provided in a sperate technical appendix if needed.*
 - e. *One of the Council's priorities is to work with Heathrow Airport, it is understood that the majority of local emissions associated with Heathrow Airport are from transport to and from the airport rather than aviation emissions, but the Source Apportionment would also benefit from a review of aviation emissions. These can be obtained from the Background Maps on UK-Air. Other background sources such as Domestic and Rural contributions can also be found in the Background Maps which would make for a more robust Source Apportionment study.*
9. *There is limited information on the estimated cost of measures, and no cost-benefit analysis contained within the action plan.*
10. *The report is generally well formatted and proofread, one minor improvement recommendation would be that the font is consistent throughout the document.*

This commentary is not designed to deal with every aspect of the report. It highlights a number of issues that should help the local authority either in completing the Air Quality Action Plan Report adequately (if required) or in carrying out future Review & Assessment work.

Issues specifically related to this appraisal can be followed up by returning the attached comment form to Defra, Welsh Government, Scottish Government or DOE.

For any other queries please contact the Local Air Quality Management Helpdesk:

Telephone: 0800 0327 953

Email: LAQMHelpdesk@bureauveritas.com

Notice for 2024

Changes to the Local Air Quality Management Framework

Through the Environment Act 2021 and updated Local Air Quality Management Statutory Policy Guidance 2022, the Local Air Quality Management (LAQM) framework has been considerably strengthened. This page highlights some of the changes for delivery to help you prioritise action for improved air quality: -

1. Strengthened Criteria for Air Quality Action Plans (AQAPs)

Where a Local Authority is not meeting air quality objectives, they must create an AQAP setting out their intentions to improve air quality in the area. Without current action plans in place, Local Authorities risk negatively impacting their communities by not proactively working to reduce air pollution in the area.

The requirements and guidance around AQAPs were recently strengthened under the Environment Act 2021 and revised LAQM Statutory policy guidance, which Local Authorities must have regard to. The key criteria for action plans are that they: -

- set out the measures they will take to secure the achievement, and maintenance, of air quality standards and objectives.*
- specify a date by which each measure will be carried out*
- are revised no later than every five years*

2. New Escalation Process for Reporting

Government is committed to increasing transparency by requiring timely and accurate publication of Annual Status Reports (ASRs) and AQAPs by local authorities, as set out in the Environmental Improvement Plan 2023. These documents are public-facing and serve to keep local communities informed of the steps being taken by their local authority to improve air quality.

To ensure ASRs and AQAPs are delivered on time, Defra has introduced a new reminder and warning letter system for Local Authorities. This system was set out in the LAQM Statutory Policy Guidance 2022 and started to apply from 30 June 2023.

If reporting requirements continue to be missed, the matter can be escalated to a Section 85 Secretary of State direction to the relevant Local Authority Chief Executive specifying action. You are therefore advised to ensure all statutory reporting duties for LAQM are met on time.

3. Public Bodies Required to Contribute to Action Plans

The Environment Act 2021 amended the Environment Act 1995 to increase the number of public bodies that have a duty to co-operate with Local Authorities for LAQM. Air quality partners are certain other public bodies that a Local Authority identifies as having responsibility for a source of emissions contributing to an exceedance of local air quality objectives. This could be a neighbouring authority, National Highways, or the Environment Agency. Once identified, there is a statutory requirement for such public bodies to engage and to contribute actions they will take to secure achievement of the local air quality objective and to maintain achievement thereafter.

All tiers of local Government are also now required by law to collaborate to address exceedances of Air Quality Objectives. County councils, the Mayor of London and combined authorities have similar duties to air quality partners. The difference is that, when requested, they must contribute to an action plan being prepared by a Local Authority, regardless of whether the local authority has identified them as being responsible for a source of emissions.

Under the new legislation, you may choose to request the support of another public body in the development of an AQAP and the same may be requested of your organisation.

Please refer to the LAQM Statutory Policy Guidance 2022 for more information.

Should you require further assistance, please contact the LAQM Helpdesk:

<https://laqm.defra.gov.uk/air-quality/featured/england-exc-london-policy-guidance/>

Web: <http://laqm.defra.gov.uk/helpdesks.html>

FAQs: <http://laqm.defra.gov.uk/laqm-faqs/>

Tel: 0800 032 7953

Email: laqmhlpdesk@uk.bureauveritas.com

The Air Quality Hub also provides free online information and is a knowledge sharing resource for local authority air quality professionals: <https://www.airqualityhub.co.uk/>

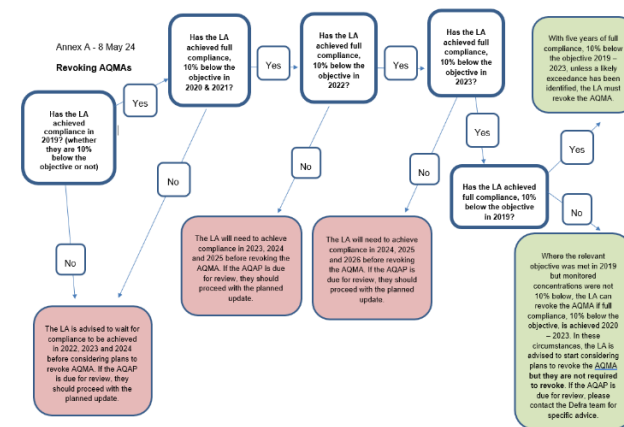
SBC RESPONSE TO DEFRA: The email response dated August 30, 2024, from DEFRA Helpdesk confirmed that all issues raised (1-10) have been addressed to satisfaction as follows. Appendix C AQMA Order and an updated Appendix D Updated Equality and Diversity Impact Assessment have been attached to this response.

DEFRA commentary	SBC Response	DEFRA Helpdesk Comment
<p>1. SBC have discussed current air quality within the borough. Exact concentrations for 2022 are not reported, besides within Figure 1. This can be hard to read.</p>	<p><u>Wednesday, July 31, 2024</u></p> <p>This is not required in an AQAP. It is stated in Section 2 of the AQAP Template that "Local authorities may supplement as required, for example where multiple AQMAs are being addressed within one AQAP or leave as a simple reference to latest ASR if appropriate".</p> <p>We have provided an overview and provided a hyperlink (i.e. refer to page 4 of the AQAP) to the latest 2023 Annual Status Report (ASR) for the details.</p>	<p><u>Tuesday, August 6, 2024</u></p> <p>The comment was related to Figure 1 which showed there was some overlap where there were several diffusion tubes located close together and it was harder to see the concentrations at all locations. Suggested either including separate images for these locations for clarity or a table showing sites and monitored concentrations</p>
	<p><u>Wednesday, 28 August 2024:</u></p> <p>Figure 1 has been modified.</p>	<p><u>Friday, August 30, 2024</u></p> <p>Responses approved</p>
<p>2. Additionally, there is one monitoring site with a concentration above 40 µg/m3 in 2022, but this is reported to be below the annual mean NO2 objective after distance</p>	<p><u>Wednesday, July 31, 2024</u></p> <p>As stated, strictly speaking in accordance with Section 7.85 of LAQM TG (22) the distance correction should not be used as the diffusion</p>	<p><u>Tuesday, August 6, 2024</u></p> <p>Discussed with relation to recommended flowchart from LAQM:</p>

correction. The level of exceedance prior to distance correction, and the distance corrected concentration for this monitoring site, should be reported for clarity. The concentration of the site would determine the validity of retaining the AQMA and therefore the need for the AQAP. If the concentration at relevant exposure is within 10% of the objective or has been compliant for less than three consecutive years, the AQMA should be retained. For more information see [LAQM FAQ 142](#) or contact the LAQM Helpdesk.

tube is on the opposite side of the carriageway to the receptor. However, as there is no exposure at the monitoring site the distance correction calculator has been used to illustrate the likely exposure at the nearest receptor. The concentration drops from 40.8 µg/m³ to 33.4 µg/m³. SBC is not proposing to revoke the AQMA on this basis, but this information demonstrates that there are no relevant exceedances in the Borough at the current time.

Please refer to the latest Spelthorne 2023 Annual Status Report (ASR) available at <https://www.spelthorne.gov.uk/article/17839/Air-quality-reports>.



Agree that, due to exceedances in 2023 and 2019, it is not possible to yet revoke

Responses approved and no further action needed.

3.Both diffusion tube results and dispersion modelling are known to have a margin of error within their reported concentrations. As such, any decision making should account

Wednesday, July 31, 2024

There are no plans to revoke the current AQMA, so this information is not required at this time.

Tuesday, August 6, 2024

As above:

Responses approved and no further action needed.

for this, and Defra recommends that a confidence threshold of 10% be used when seeking to determine whether to revoke an AQMA. In practice, this means that predicted annual mean concentrations of NO₂ from modelled results should be judged against a 36 µg/m³ limit for determining compliance. This is set out in LAQM FAQ 142. It is stated within the draft AQAP that the study completed in 2022 by Ricardo as part of the source apportionment exercise shows concentrations would achieve compliance by 2022 at all modelled locations. It should be confirmed whether this is below the Air Quality Objective of 40 µg/m³ or the 10% confidence value of 36 µg/m³.

4. None of the measures presented within the AQAP have had their impact on air quality quantified. As per paragraph 2.85 of LAQM Technical Guidance (TG22), an AQAP must contain quantification of the impacts of measures as a minimum. This could be aided by dispersion modelling or using the Emissions Factors Toolkit for road traffic emissions.

Wednesday, July 31, 2024

As stated in the Action plan, there are currently no exceedances at receptors in the borough.

Therefore, the actions are predominantly aimed at general reduction in emissions rather than targeted schemes that are quantifiable.

A document summarising the quantification carried out where possible have been included in the AQAP.

Tuesday, August 6, 2024

There are several measures in which the change of emissions can be quantified using the [Emissions Factors Toolkit](#).

- Converting 50% of the Council fleet to electric or hydrogen by 2028 as stated in SBC's response to the Climate Emergency. (amend using the detailed options input based on the council's current fleet)
- Improvements to signalling at Sunbury Cross Roundabout Capacity and cycle safety improvement not yet funded. Could review existing Department for Transport traffic around this area and determine the change from queuing traffic (represented by inputting 5kph into the EFT) to more free flowing traffic (represented by inputting the speed limit into the EFT).

Wednesday, 28 August 2024:

Friday, August 30, 2024

	<p>Regarding quantifying the impact of the proposed measure on air quality as per paragraph 2.85 of LAQM Technical Guidance (TG22), this is very challenging because we currently don't have enough data.</p> <p>Our proposal to resolve the issue about "quantification of the impact of the proposed measures on air quality and cost-benefit analysis" is shown on the attached document and included in the action plan.</p>	<p>Responses approved and no further action needed.</p>
<p>5. As a result of this omission, it is difficult to determine the likely improvements that are predicted to arise from the implementation of the AQAP. The action plan does not state whether the implementation of measures will result in the objective being obtained, though it is recognised there are currently no exceedances within either AQMA at relevant exposure. The plan must also</p>	<p><u>Wednesday, July 31, 2024</u></p> <p>It is not possible to quantify the mostly "soft" measures in the action plan (which should be read more as a strategy). However, the combination of general improvements in air quality and Spelthorne's commitment to aim for the WHO guidelines, along with the raft of measures in the plan show SBC's commitment to continuous improvement in air quality.</p>	<p><u>Tuesday, August 6, 2024</u></p> <p>Responses approved, and no further action needed.</p>

<p>address how the local authority intends to ensure compliance is maintained.</p>		
<p>6. As per section 2.22 of LAQM.TG (22), the AQAP is recommended to include the population within the AQMA area.</p>	<p><u>Wednesday, July 31, 2024</u></p> <p>At the time of writing the plan, the whole borough was an AQMA. The area was reduced in 2023 as shown in Appendix C AQMA Order. Please see the updated Equality and Diversity Impact Assessment (Appendix) which accompanies the AQAP.</p>	<p><u>Tuesday, August 6, 2024</u></p> <p>It would be beneficial to include a brief sentence stating this within the AQAP and that the population of Spelthorne BC was 102,956</p>
	<p><u>Wednesday, 28 August 2024</u></p> <p>A brief sentence included in the AQAP</p>	<p><u>Friday, August 30, 2024</u></p> <p>Responses approved.</p>
<p>7. Discussion surrounding the public health and policy context is considered sufficiently detailed. SBC also examined air quality through a broad lens, considering wider regional factors, such as Heathrow airport strategies, actions by nearby</p>	<p><u>Wednesday, July 31, 2024</u></p> <p>No response required.</p>	

<p>Guildford Borough Council, as well as the impact of introduction of ULEZ in London Boroughs neighbouring SBC. This is welcomed, demonstrating SBC’s co-operation with external groups.</p>		
<p>8. A source apportionment study has been undertaken in 2022, with the action plan also reporting on a similar source apportionment work conducted by CERC in 2019. Some improvements which could be made to the reporting of this work in the AQAP are:</p>	<p><u>Wednesday, July 31, 2024</u></p> <p>It should be noted that these modelling studies have been published for some time and are referenced in order to provide general context rather than as the basis of identifying actions.</p>	<p><u>Tuesday, August 6, 2024</u></p> <p>As discussed, it would be helpful to include a link to the modelling study within the text of the AQAP</p>
<p>a) The 2022 source apportionment was completed for six study areas. It may be clearer to present the information in a table to allow for easier comparison and understanding of results. For example, to see the</p>	<p><u>Wednesday, 28 August 2024:</u></p> <p>The link has been included in the AQAP.</p>	<p><u>Friday, August 30, 2024</u></p> <p>Responses approved</p>
<p>a) The 2022 source apportionment was completed for six study areas. It may be clearer to present the information in a table to allow for easier comparison and understanding of results. For example, to see the</p>	<p><u>Wednesday, 28 August 2024:</u></p> <p>The results of the modelling were presented for context, but not relied upon as there are no exceedances. Therefore, only a summary was</p>	<p><u>Tuesday, August 6, 2024</u></p> <p>As above. Responses approved.</p>

<p>degree to which certain areas are more dominated by background sources vs road traffic sources.</p>	<p>provided/needed in the Action Plan. Links are provided to the original report.</p>	
<p>b) The 2022 source apportionment indicates background sources as the greatest contributor, whilst the 2019 work suggest the largest proportion of emissions can be attributed to road traffic. This discrepancy should be explored further; it is not clear whether there has been a genuine change in emission sources over the time passed between both studies, or if there is a difference in methodology (e.g. different sites used).</p>	<p><u>Wednesday, July 31, 2024</u></p> <p>"Again, the modelling information was provided for general context only. The report explains the differences: "For 2019 the CERC modelling showed that generally the largest contribution to NO_x.</p> <p>Concentrations at roadside locations was from road traffic. The Ricardo modelling in 2019 showed that generally the largest contribution was from background sources. The differences in modelling methodology may account for some of this difference, but it is also indicative of the national trend towards lower vehicle emissions, with the Ricardo modelling having been undertaken in a later year (and hence with cleaner vehicle fleet). Although background concentrations will also have reduced, proportionally, this will not have been as great a</p>	<p><u>Tuesday, August 6, 2024</u></p> <p>As above.</p> <p>Would be beneficial to including the SBC response note within text of the AQAP.</p>

	<p>reduction as for vehicle emissions. When looking at the road emissions in more detail, both the CERC and Ricardo assessments showed that diesel vehicles were the largest contributor to NOx emissions."</p>	
<p>c) The text states it is likely that since 2017, the proportion of diesel cars has reduced and LGVs may have increased. The reasons for this should be detailed as this could affect the measure derivation.</p>	<p><u>Wednesday, July 31, 2024</u></p> <p>This information would not affect the determination of measures as the reduction in diesel vehicles as a percentage of the fleet is a national trend.</p>	<p><u>Tuesday, August 6, 2024</u></p> <p>As above</p>
<p>d) The methodology of both studies is not clear and thus it is difficult to determine if this has been completed in line with LAQM.TG (22). This could be provided in a sperate technical appendix if needed.</p>	<p><u>Wednesday, July 31, 2024</u></p> <p>The modelling methodologies are available in the reports presented on SBC's website at https://www.spelthorne.gov.uk/article/17831/Air-quality. Both studies were completed prior to TG (22).</p>	<p><u>Tuesday, August 6, 2024</u></p> <p>As above</p>

<p>e) One of the Council’s priorities is to work with Heathrow Airport, it is understood that the majority of local emissions associated with Heathrow Airport are from transport to and from the airport rather than aviation emissions, but the Source Apportionment would also benefit from a review of aviation emissions. These can be obtained from the Background Maps on UK-Air. Other background sources such as Domestic and Rural contributions can also be found in the Background Maps which would make for a more robust Source Apportionment study.</p>	<p><u>Wednesday, July 31, 2024</u></p> <p>SBC has very limited powers to influence aviation emissions. SBC are committed to working closely with Heathrow, but a more detailed assessment of the airport emissions would not benefit the action plan as no measures can be enacted by SBC to tackle this.</p> <p>A brief commentary has been included in the AQAP.</p>	<p><u>Tuesday, August 6, 2024</u></p> <p>Possible to get an overview from background maps on UK-Air, see attached worked example.</p> <p>Worth including brief commentary on this.</p>
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<p>9. There is limited information on the estimated cost of measures, and no cost-benefit analysis contained within the action plan.</p>	<p><u>Wednesday, July 31, 2024</u></p> <p>A high-level cost-benefit analysis will be included in the action plan.</p>	<p><u>Tuesday, August 6, 2024</u></p> <p>As discussed, only a high level with indicative costs is required. It would be helpful to align</p>
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A high-level cost-benefit analysis has been included in the AQAP.

with the cost range categories as highlighted in the AQAP template guidance box.

10. The report is generally well formatted and proofread, one minor improvement recommendation would be that the font is consistent throughout the document.

Wednesday, July 31, 2024

Noted

Thanks, this is appreciated.

THE ENVIRONMENT AGENCY

Dear Eliane,

Thank you for the opportunity to comment on your Air Quality Action Plan (2024 - 2029) for the borough of Spelthorne.

Unfortunately, we are not able to provide detailed comments on every Air Quality Action Plan we receive so we have compiled a summary of the issues/priorities that we feel are common to each Air Quality Action Plan and where possible/appropriate, we have made Spelthorne Borough Council specific comments.

General

Air quality has a significant role to play in the health and wellbeing of communities and the prospects of the natural environment, reducing both life expectancy and biodiversity in heavily polluted areas, and otherwise impacting upon the perception of the quality of life and amenity offered by the area. For example, reports suggest that there over 40,000 early deaths per year in the UK due to air pollution.

The Environment Agency – our role in Air Quality

We have a number of duties related to air quality: -

- 1. We ensure that the industrial facilities we regulate comply with the Environmental Permitting (England and Wales) Regulations 2016, thus contributing to compliance with:
 - UK requirements such as the UK Air Quality Strategy, the Countryside and Rights of Way Act and the Natural Environment and Rural Communities Act; and*
 - EU requirements on the UK such as Air Quality Directives, Habitats Directive, the National Emissions Ceiling Directive and the Industrial Emissions Directive.**
- 2. We support local authorities in improving local air quality, particularly through providing technical guidance on behalf of Defra to local authorities in respect of industrial facilities they regulate.*
- 3. We coordinate ambient air quality monitoring for incidents that may have a significant impact on air quality.*
- 4. We were not generally responsible for assessing or monitoring ambient air quality until April 2016 when the EA took on the contract management of the latter in the form of the ten monitoring networks that were formally managed by Defra.*

The Environment Agency is committed to working with local authorities and to play our part fully in Local Air Quality Management (LAQM). We have found that several sectors we regulate under the Environmental Permitting Regulations have the potential to affect air quality negatively. Nationally some individual installations in these sectors have already been found to contribute significantly and we have been working with the affected local authorities for some time to implement the necessary improvements. Installations we regulate may be covered by freestanding Air Quality Action Plans or ones, which are transport-related and incorporated into Local Transport Plans.

We suggest that any new Air Quality Action Plan adheres to the principles in the London Plan and Air Quality policy SI 1, including air quality neutrality and air quality positive, as well as the relevant SPD's. The plan must also help to bring local air quality below EU limit values for local pollutants - in particular PM10, PM2.5 and NO2, as expressed in the EU Air Quality Directive and implemented in the UK through the 2010 air quality regulations.

Preferred Position –

In principle any Air Quality Action Plan should: -

- 1. Have a clear commitment to meeting the relevant air quality standards.*
- 2. Clearly state the current status of air quality within the borough.*
- 3. Clearly report on the progress against targets set out in any previously published Air Quality Action Plan (if appropriate).*
- 4. Where the borough does not meet the relevant air quality standards, they should clearly detail what mitigation measures will be used to ensure compliance with air quality standards in the shortest possible time period. It should ensure that compliance is not just 'possible' but 'likely'.*
- 5. Make clear what other organisations the borough is working with/planning to work with to implement improvement measures (as in 2 above), and what they are agreeing to deliver.*
- 6. Include basic costs required to implement the required mitigation standards and compare against the level of funding available.*
- 7. Take steps to ensure the measures in the Mayor of London's SPDs on sustainable design and construction or any update thereof to an equal or higher standard are implemented into the air quality action plan; In particular this should include: -*
 - a) Require all new buildings be constructed and designed in a manner that minimises emissions of pollutants to the air both during construction and demolition and postconstruction, making new development 'air quality neutral' or better.*
 - b) In the case of a major development, include an air quality assessment (as set out in the Mayor of London's SPDs on sustainable design and construction, or update thereof, to an equal or higher standard) that considers the potential impacts of pollution from the major development*

and on neighbouring areas during construction and operation, including development related traffic and the potential for exposure to pollution levels above.

- c) Implement any policies on transport which pertain to improving air quality.*
 - d) Require any waste transfer stations to be in a building, enclosed on all vertical sites with small access and egress points covered by doors which default closed when not in use and an air extraction and filtration system to collect particulates as per London Plan Policy SI 8 E 4.*
 - e) Require all industrial sites that use non road going mobile machinery to meet the latest NRMM standards on the date of purchase, or hire.*
- 8. Contribute to achieving EU established health-based standards and objectives for the relevant air pollutants (particularly NO₂, PM₁₀, and PM_{2.5}).*
- 9. Take steps to ensure measures in the Mayor of London's London Environment Strategy (LES) are fully adopted by your Air Quality Action Plan.*

Traffic –

Where there is a significant incidence of poor air quality within and adjacent to the area of concern (and in most cases this is directly attributable to emissions from road traffic) air quality policies must work in partnership with transport policies but also the authorities' own fleet procurement policies, and partner authorities/ organisations.

Developments –

Any new development, particularly in air quality 'hotspots' or development 'Opportunity areas', will need to consider how they mitigate the impacts of poor air quality. During construction the main air quality effects from development are anticipated to result from emissions of oxides of nitrogen (NO_x) and fine particulate matter and dust (PM₁₀ and PM_{2.5}) emanating from an increase in road traffic, and from traffic management schemes. Therefore, mechanisms for minimising air pollution will need to be closely tied into the transport policies in the London Plan and London Environment Strategy.

Major developments planned within the borough will need to significantly mitigate their emissions and thus contribute towards improving local air quality as per the requirements of Air Quality Neutral and Air Quality Positive. This is particularly the case where they include potentially new sources of emissions such as biomass boilers, data centres, diesel array power generation, combined heat and power plants, and increased traffic-generated emissions. The effects on air quality during construction will also need to be managed, both in terms of emissions that generated from traffic, and from the treatment and processing of material from demolition and excavation.

Construction and demolition works should be required to meet or exceed the requirements set out in the Institute of Air Quality Management's Guidance on the 'Assessment of Dust from Demolition and

Construction' or the Mayor of London's published supplementary planning guidance on 'Sustainable Design and Construction', and the 'Control of Dust and Emissions' during Construction and Demolition or published updates thereof.

We are also aware that Air Quality Neutral, Air Quality Positive and 'Agent of Change' policies can affect existing industrial sites we regulate where they are within or adjacent to new development. In these cases, we encourage early contact with our relevant officers.

Non-Road Mobile Machinery –

Where a commercial or industrial site involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during construction, and/ or operation, and/ or demolition at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in [Regulation \(EU\) 2016/1628](#) (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority. We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection.

Waste Management Sites –

Waste management sites are a potential source of dust and fine particulate emissions to air. Those sites which mitigate the potential effects of air pollution by enclosing processes within buildings tend to be far less polluting and enclosure is now recognised as best practice for such sites. Consequently, we encourage any new air quality management area declaration, Air Quality Action Plan and/or proposed Clean Air Zones to require the further enclosure of existing waste handling sites and expect future waste development to be fully enclosed within buildings to minimise health impacts, improve amenity, and contribute towards improving air quality.

Regional Approach to Local Air Quality –

It is recognised that Spelthorne Borough Council (SBC) will need to work with others on the implementation of the measures necessary to address poor air quality as the matter is not confined to one planning authority area, and development is often

governed by separate regulatory regimes and legislation, such as building regulations and environmental permitting.

Summary –

It is important to note that we are not aware of any waste facilities or other industrial installations regulated by the Environment Agency in the borough of Spelthorne that are causing or contributing to failures of air quality standards.

We are pleased to see SBC has used national and local legislation, policies, strategies, plans and resources to aid in the planning and development of the Air Quality Action Plan (AQAP), and that these have helped identify topics and issues, and aid development of SBC's priority areas, actions and proposed suite of measures.

It is encouraging to see that SBC has also identified five priorities including maintaining air pollutant concentrations below current air quality objectives and further reducing emissions, working collaboratively with Surrey County Council regarding transport measures, Heathrow Airport Ltd regarding airport operations, and neighbouring London Boroughs to reduce emissions of particulate matter and NOx within and outside the borough. The AQAP positively outlines how SBC plan to effectively tackle air quality issues within its control.

Finally, it is good to see that the Environment Agency and SBC is in agreement that we both need to cooperate and work together, not just with one another – but also with the other partners, stakeholders and organisations referenced in the AQAP to secure a positive outcome for the AQAP.

If you have any questions, please do not hesitate to contact me.

Kind regards,

[Redacted signature]

Environment Management | EPR Waste

Hertfordshire and North London

Environment Agency | Alchemy, Bessemer Road, Welwyn Garden City,
AL7 1HE Email: [Redacted email address]





SBC RESPONSE TO THE ENVIRONMENT AGENCY: The comments have been noted by SBC and no further action is needed.

SURREY COUNTY COUNCIL(SCC) HIGHWAYS AUTHORITY

Dear Eliane and team,

I am emailing in response to the consultation on the draft AQAP. I work in the Transport Policy Team at Surrey County Council. Our team is responsible for the LCWIP and Local Street Improvements programmes, and I myself am part of the Spelthorne LCWIP project team. The below is the Transport Policy Team's response to the draft AQAP consultation:

- Agree with the aims and actions identified within the AQAP.*
- Measure 16 refers to 'Liveable Neighbourhoods'. These have now been renamed 'Local Street Improvements' (LSIs). More information on the County's LSI programme is available here: <https://www.surreycc.gov.uk/roads-and-transport/policies-plans-consultations/transport-plan/strategies/local-street-improvements> We recommend that the reference to 'Liveable Neighbourhoods' within the AQAP be replaced with 'Local Street Improvements' because the Liveable Neighbourhoods programme is now the Local Street Improvements Programme.*
- The [Spelthorne Local Cycling and Walking Infrastructure Plan](#) (LCWIP) is the primary plan for implementing walking and cycling improvements in Spelthorne. It will be used by SCC as the primary document for securing funding for walking and cycling infrastructure in the borough. It is much more wide reaching than the Local Street Improvements programme, whose schemes are much smaller and more local in scale. It is important that, as the key vehicle for implementing cycling and walking infrastructure in the borough, the LCWIP is named as a standalone measure. This is consistent with other AQAPs from districts and boroughs across the county that have an LCWIP in place, as Spelthorne does.*

Please let me know if you have any questions about the above.

Kind regards,

PDP Transport Planner
Environment, Infrastructure & Growth
[surreycc.gov.uk](https://www.surreycc.gov.uk)



3. SBC DETAILED RESPONSES TO THE CONSULTATION

SBC RESPONSE TO THE PUBLIC CONSULTATION

(Dated sept 2024)

Our Local Transport Plan [Local Transport Plan \(LTP4\) - Surrey County Council \(surreycc.gov.uk\)](https://surreycc.gov.uk) sets out our commitment to transforming the county's transport networks in order to achieve net zero carbon emissions by 2050, in line with the national target and our Climate Change Delivery Plan. 46% of Surrey's carbon emissions come from transport.

Walking and cycling are the least polluting ways of getting about and are a key part of our plans to reduce carbon emissions from transport by reducing the number of car kilometres travelled. We are developing a county wide network of walking and cycling infrastructure that will help to achieve this by supporting the delivery of our Local Transport Plan policies for planning for place and active travel and personal mobility.

Our Local Transport Plan also aims to support sustainable growth and create well-connected communities with clean air and excellent quality of life. The Community Vision for Surrey in 2030 sets out our ambition for clean, safe and green communities, where everyone's journeys are easier, our infrastructure supports sustainable growth, and everyone is able to live happy, healthy, active and fulfilling lives.

Response to Maintenance comments

The county council as the Highway Authority are fully aware that the state of our roads continues to be a source of frustration for many of our residents. The increasingly wet weather really impacts our roads – which are some of the busiest in the country. We are focused on doing everything within our power to improve the quality of our road network. We know it's our most visible universal service – vital for everyone and hugely frustrating when it's not working, not safe or in poor condition.

Most of the council's Highways budget is for improving the resilience of our transport networks and to provide more sustainable travel choices for local journeys, including walking and cycling to reduce transport emissions. The 2024/25 budget prioritise services that support improved roads and pavements, make communities safer, improve public transport and respond to the climate emergency, all of which are aligned with our Surrey Transport Plan (LTP4).

We have committed additional funding this year to deliver a further 112 surface dressing schemes, we've invested over £8m to deliver real improvements on 85 miles of our busiest areas of the network to address the issues of potholes. And this is just one aspect of our enhanced maintenance programme for roads and pavements which will see us deliver a further £300m worth of vital improvements by 2028, including better maintenance of footways and ensuring walking and cycling routes are cleared of overgrown vegetation. We're working hard to reduce the impact caused by works on our network too.

We're also scaling up our own communications with residents about our highways, providing clear, informative on-the-ground signage and local, bespoke weekly updates.

Response to Electric Vehicle comments

Promoting the transition towards Electric Vehicles and associated is key to reducing the number of polluting vehicles on Surrey's roads to achieve our net zero transport carbon emissions ambitions by 2050. Our policy area [Promoting Zero Emission Vehicles \(ZEVs\) policy area](#) sets out our plans to increase uptake by providing more EV chargepoints across Surrey and raising awareness of the benefits of EVs.

The number of public chargepoints is growing daily and employers are also providing chargepoints at workplaces. There are several public charging networks operating in the Surrey area. The best way to find your nearest chargepoint using the Zap Map website. This is regularly updated to show the latest public chargepoint locations, including on-street chargepoints managed by Surrey County Council, as well as chargepoints managed by other operators.

Further information on how we are providing EV infrastructure and how to suggest potential locations for EV charging points is available here [Electric vehicles and our on-street chargepoint rollout - Surrey County Council \(surreycc.gov.uk\)](#)

Response to Walking & Cycling comments

The county council want walking and cycling to be the natural choice for short trips to local shops and services such as schools, with walking and cycling available to everyone as low cost, enjoyable, safe, healthy and pollution-free ways to get about. We also want walking and cycling to be convenient ways to get to bus stops and railway stations so that longer journeys across the county and beyond can be made without the need for a car.

We recognise that walking and cycling are often not as easy or pleasant as they could be and as a result many of these short trips are currently undertaken by car instead, adding to congestion and damaging our climate. Through the LCWIPs, we plan to invest in changing this to make walking and cycling great ways to get about for more of the trips that you want to make.

Our walking and cycling improvements will also make it easier to wheel and scoot, to use a mobility aid and to travel with small children or luggage, ensuring that nobody is left behind and everyone has the option to use sustainable modes of transport.

Through the LCWIPs we can plan investment in local places such as high streets to improve the experience of using public spaces and create welcoming, enjoyable places where people want to spend time outdoors and in local businesses.

The Spelthorne (LCWIP) is a ten-year investment plan for walking and cycling in the borough. It identifies where we want to prioritise investment and sets out some initial options and ideas for improving walking and cycling across the borough.

LCWIPs are the best practice approach nationally for planning walking and cycling improvements and our process follows Department for Transport guidance. To find out more about LCWIPs, including what they are and the process that we have followed to develop LCWIPs for the county, please see our plans to improve cycling and walking page.

The LCWIP focuses on strategic network connections and aims to create a wider walking and cycling network for the borough. Local neighbourhood and street level interventions are not included within the LCWIP and will be part of separate workstreams that aim to improve walking and cycling provision at smaller scales. For example, we aim to develop 'Liveable Neighbourhood' schemes to increase the comfort, safety and accessibility of walking and cycling on residential roads by recognising the importance of these streets as places for people, and not just their importance for the movement of vehicles. 'Liveable Neighbourhoods' will create attractive local environments that connect residents to the wider LCWIP network and make walking and cycling easier, safer, more enjoyable, convenient, and fun for everyone. To find out more about our plans for walking and cycling at the street and neighbourhood scale, please refer back to our Local Transport Plan policies. Webpage.

Response to Public Transport comments

We want buses to be the first choice of transport for people living and working in Surrey. We are passionate about improving bus services in partnership with our operators so that all our residents and businesses can benefit. We want to be seen as a leader in investing in bus services and infrastructure, with better and more comprehensive bus services, high quality supporting infrastructure for passengers, more bus priority measures, more real time Information and many more zero emission buses. We want to use new technology and new delivery models so that public transport in Surrey meets the needs of residents and businesses and is financially sustainable.

The county council had already allocated significant capital funding across four key investment areas, including investing £32.3m to bring more zero emission buses into Surrey to be delivered in partnership with bus operators; investing £6.3m to introduce more electric minibuses to be delivered in partnership with the community transport sector; Investing £9m in bus priority measures at key pinch points to improve reliability and make buses more attractive to existing and potential users; and a further investment of £1.4m to expand our RTPI system helping residents make more informed travel choices.

As part of the Future Bus Network Review undertaken in 2022/23, the County Council consulted with residents and stakeholders on the proposal to introduce more DDRT services and in some cases replace infrequent conventional local bus services with DDRT services. The aim was to provide all residents and across all age groups with greater flexibility with travel times and destinations, together with increased hours of operation. The DDRT services are similar to conventional local bus services in that passengers board and alight at predetermined bus stops (with physical infrastructure or virtual bus stops), yet with a greater flexibility of destination for those passengers.

By September of this year, we plan to have 28 electric minibuses operating on DDRT services in Surrey, adding to the complementary work in transitioning the community transport fleet to zero emission vehicles. In September 2023 five further Surrey Connect services started operation, using eight additional vehicles, making a total of 12 mini buses in service. The existing DRT scheme centred on the Longcross development will shortly be expanded to cover some areas of Spelthorne.

Other detailed responses by SBC are available Upon Requested only

Appendix C AQMA Order



Environment Act 1995 Part IV Section 83(1)

SPELTHORNE BOROUGH COUNCIL
AQMA No. 1 Order 2024

Spelthorne Borough Council, in exercise of the powers conferred upon it by Section 83(1) of the Environment Act 1995, hereby makes the following Order.

This Order may be cited/referred to as the Spelthorne Borough Council Air Quality Management Area No1 Order 2024 and shall come into effect on 1st April 2024.

The area shown on the attached map in red is to be designated as an air quality management area (the designated area). The designated area incorporates an area encompassing the north of the borough and the strategic roads throughout the borough. The area extends south to sections of the B376 and B377 in Staines-upon-Thames, Shepperton and Laleham, including the boroughs highstreets and extending to Thames Street in Sunbury on Thames. The area covers the road network giving access to bridges over the River Thames.

This Area is designated in relation to a likely breach of the nitrogen dioxide (annual mean) objective as specified in the Air Quality Standards Regulations 2010.

This Order shall remain in force until it is varied or revoked by a subsequent order.

This Order revokes the Spelthorne Borough Council Air Quality Management Area Order made on 1st August 2003.

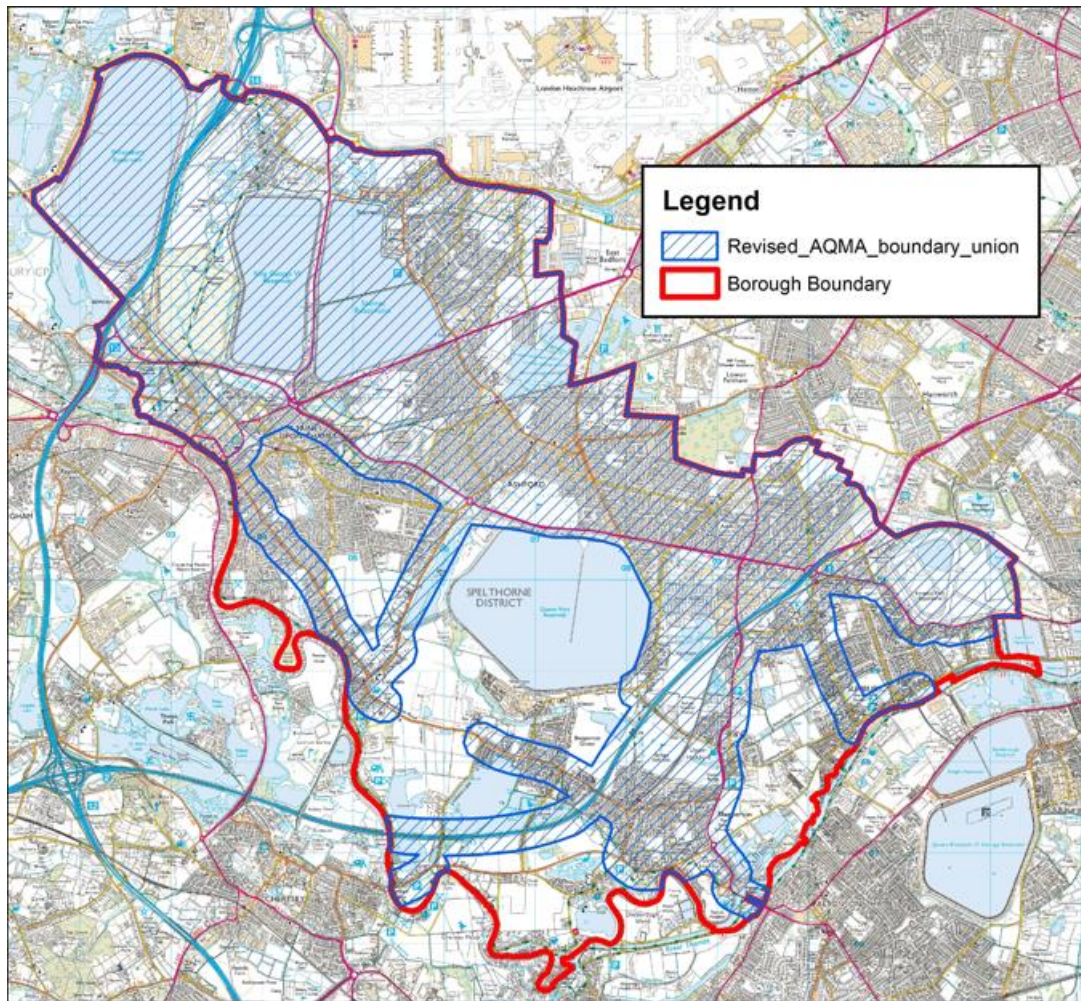
The Common Seal of Spelthorne Borough Council was hereto affixed on and signed in the presence of
14 March 2024
[Signature]
LINDA HERON
LEGAL SERVICES MANAGER AND
DEPUTY MONITORING OFFICER



Authorised Signatory on behalf of said Council.

12836

Seal Number:



Appendix D Updated Equality and Diversity Impact Assessment

Equality Analysis

<p>Directorate: Place, Protection and Prosperity</p> <p>Service Area: Environmental Health</p>	<p>Lead Officer: Claire Lucas, Principal Pollution Control Officer Tracey Willmott-French, Senior Environmental Health Manager</p> <p>Date completed: 2nd April 202</p>
<p>Service / Function / Policy / Procedure to be assessed: Air Quality Action Plan</p>	
<p>Is this:</p> <p>New / Proposed <input type="checkbox"/></p> <p>Existing/Review <input checked="" type="checkbox"/></p> <p>Changing <input type="checkbox"/></p>	<p>Review date: 2nd April 2024</p>

Part A – Initial Equality Analysis to determine if a full Equality Analysis is required.

What are the aims and objectives/purpose of this service, function, policy or procedure?

The Air Quality Action Plan (AQAP) outlines the actions that Spelthorne Borough Council will take to improve air quality in Spelthorne Borough between 2024 and 2029. This action plan replaces the previous action plan which ran from 2005. The AQAP is a statutory document which is part of the Local Air Quality Management process.

Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment		+
Advancing equality of opportunity	+	
Fostering good community relations	+	

If not relevant to any of the three equality duties and this is agreed by your Head of Service, the Equality

Analysis is now complete - please send a copy to **NAMED OFFICER**. **If relevant**, a Full Equality Analysis will need to be undertaken (PART B below).

PART B: Full Equality Analysis

Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)

<p>What outcomes are sought and for whom?</p>	<p>The Air Quality Action Plan (AQAP) outlines the actions that Spelthorne Borough Council will take to improve air quality in Spelthorne Borough between 2024 and 2029. The Equality and Diversity Impact Assessment aims to identify how the planned measures might impact different groups of people (with reference to the protected characteristics of age, disability, sex, gender reassignment, pregnancy and maternity, race, sexual orientation, religion or belief, marriage and civil partnership).</p>
<p>Are there any associated policies, functions, services or procedures?</p>	<p>This AQAP is formulated in accordance with the statutory obligations outlined in the Local Air Quality Management framework, which includes periodic reviews. Its primary objective is to assist Spelthorne in fulfilling its legal obligations as a local authority to pursue the UK air quality objectives. Additionally, it aims to comply with the requirements of the Local Air Quality Management (LAQM) statutory process.</p>
<p>If partners (including external partners) are involved in delivering the service, who are they?</p>	<p>Some measures in AQAP will be delivered by Surrey County Council. There are also measures which require input from Heathrow Airport Ltd. and National Highways.</p>

Step 2 – What does the information you have collected, or that you have available, tell you?

What evidence/data already exists about the service and its users? (in terms of its impact on the 'equality strands', i.e. race, disability, gender, gender identity, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

As of the 2021 census, Spelthorne has a population of [103,000](#) and is the 14th most densely populated of the South East's 64 Local Authority areas with 2,295 of residents per square kilometre.

According to the Indices of Deprivation 2019, the most deprived borough in Surrey is Spelthorne. Spelthorne has the highest number of lone-parent families and the highest level of child poverty in Surrey; it also has the highest under-18 conception rate in the county. That said, residents are largely healthy, with life expectancy for both males and females slightly above the national [average](#).

Spelthorne has a low rate of unemployment: 1.4% of those economically active aged 16 to 64, compared to the South East (2.2%) and the UK as a whole (3.5%). Heathrow Airport is a significant local employer, with 8.3% of Spelthorne's working population employed there. Significantly, 21.5% of those in work in Stanwell North are in low-level employment compared to an average of 11.6% in Surrey. Average wages are slightly above regional averages at £630 per week for full-time employees Error! Bookmark not defined.

Whilst house prices remain well above the national average, most residents are owner-occupiers (73%), followed by private rented (13%) and social rented ([12%](#)) Error! Bookmark not defined.

Gender / gender identity

Census data from 2021 show that 50.8% of residents in Spelthorne are female, with the remaining 49.2% being [male](#).

A White Paper published in December 2018 (Help shape our future: the 2021 Census of population and housing in England and Wales) set out the ONS recommendation for what the census should contain and how it should operate. The White Paper recommended that the census in 2021 include a question about gender identity, asking respondents whether their gender is the same as the sex they were registered as at birth. As a result, 93.98% of people aged 16 years and over in Spelthorne have the same gender identity as their sex registered at [birth](#).

The remaining population identify as [follows](#):

Gender identity	%
People aged 16 years and over who have a gender identity different from their sex registered at birth but no specific identity given	0.19
Identify as a trans woman	0.09
Identify as a trans man	0.09
Non-binary	0.02
Another gender identity	0.02
Prefer not to say	5.62

Age

Spelthorne has a slightly lower population of under-30s (33%) compared to the rest of the country (36%), and a slightly higher population of 30-69 year olds (53%) compared with the national average of (51%), The number of 70+ is 14%, which is broadly in line with the rest of the [nation](#).

Ethnicity

The ethnic make-up of Spelthorne is largely in line with the rest of England and Wales, predominantly residents are from a white ethnic background. However, there are slightly more Asian people and those with a mixed ethnic background but fewer people from a black ethnic group compared to the national [average](#).

Ethnic group	Spelthorne		England and Wales
	Number	%	%
Asian	13,146	12.8%	9.6%
Black	2,548	2.5%	4.2%
Mixed ethnicities	3,763	3.7%	3.0%
White	81,000	78.7%	81.0%
Other	2,503	2.4%	2.1%

Disability

Spelthorne has a slightly [lower](#) percentage of residents with a disability compared to the rest of England and Wales.

Disability	Spelthorne	England and Wales
	%	%
Disabled under the Equality Act	14.2%	17.7%
Not disabled under the Equality Act	85.8%	82.3%

As of October 2023, there were around [3,817](#) Personal Independence Payments (PIP) claimants in Spelthorne. Within Spelthorne, psychiatric disorders were the most common reason for claiming PIP. They accounted for 40% of awards, compared to [38.0%](#) in Great Britain. 'Psychiatric disorders' include anxiety and depression, learning disabilities and autism. The second most common reason for awards was musculoskeletal disease (general), which accounted for 15% of awards within the constituency and 20.0% in Great Britain. Musculoskeletal disease (general) includes osteoarthritis, inflammatory arthritis and chronic pain syndromes.

Religion

Residents of Spelthorne predominately identify themselves as either Christian or having no religion. There is a smaller Muslim population compared with the national average, but a larger Hindu and Sikh [population](#).

Religion	Spelthorne		England and Wales
	Number	%	%
Christian	52,432	50.9%	46.2%
Muslim	4,146	4.0%	6.5%
Hindu	4,372	4.2%	1.7%
Buddhist	703	0.7%	0.5%
Jewish	174	0.2%	0.5%
Sikh	2,612	2.5%	0.9%
Other	520	0.5%	0.6%
No religion	32,112	31.2%	50.8%

Not stated	5,884	5.7%	6.0%
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Sexual orientation

The sexual orientation of Spelthorne residents is largely in line with the rest of England and [Wales](#).

Sexual orientation	Spelthorne		England and Wales
	Number	%	%
Straight or Heterosexual	75,505	90.57%	89.37%
Gay or Lesbian	1,088	1.31%	1.54%
Bisexual	704	0.84%	1.28%
Pansexual	123	0.15%	0.23%
Asexual	25	0.03%	0.06%
Queer	6	0.01%	0.03%
All Other Sexual Orientations	7	0.01%	0.02%
Not answered	5,904	7.08%	7.47%

Marriage / Civil Partnership

More people in Spelthorne are married compared to the rest of England and Wales, and fewer people identify as [single](#):

Status	Spelthorne	England and Wales
All usual residents aged 16+	83,345	48,561,360
Single (never married or never registered a same-sex civil partnership)	34.2%	37.9%
Married	48.5%	44.6%
Separated (but still legally married or in a same-sex civil partnership)	2.2%	2.2%
Divorced or formerly in a same-sex civil partnership which is now legally dissolved	8.9%	9.1%
Widowed or surviving partner from a same-sex civil partnership	6.2%	6.1%

Pregnancy / Maternity

In 2022, the number of live births in Spelthorne was 1,110, with a total fertility rate of 1.60 (an average number of live children that are born to a woman throughout her childbearing lifespan) which is higher than in England and [Wales](#).

Status	Spelthorne	England and Wales
Number of births	1,110	605,342
Total fertility rate	1.60	1.49

The percentage of households including a couple with dependent children in Spelthorne increased from 21.4% in 2011 to 21.8% in 2021. During the same period, the percentage fell from 21.0% to 20.6% in the [region](#) (South East).

Income

Although income is not a protected characteristic, some measures in the AQAP may have a differential impact based on socio-economic status, and in turn, different household demographics may be more or less represented in different income bands. As such, we explore here trends in income across the protected characteristics, as context for the subsequent analysis around different AQAP measures.

Income, fuel poverty, and ethnicity. Ethnic minorities tend to have lower average incomes than white British people. In England and Wales, such BAME ethnicities as Bangladeshi, Pakistani, African, and other Black, Caribbean usually earn less than a White British [Employee](#) (2022).

Data also show that Black households (54%) were most likely out of all ethnic groups to have a weekly income of less than £600 in 2020 in the [UK](#). Additionally, Bangladeshi, Pakistani, Black and other Asian households are more likely to be in the bottom 2 income quintiles than white [groups](#). Households with a Bangladeshi head are 18 times less likely to be in the top quintile of total wealth (wealth above £865,400) than those with a White British head, for households with a Black African head the likelihood is nine times [less](#) (data for 2016-2018). 44% of Black African and Other Asian households have financial debts higher than their financial assets, which is twice more likely for them than for White British households. Some BAME groups participate in private pension schemes less, incl. Bangladeshi (48%), Chinese (57%), and Black African (59%) headed households. The level of participation among Indian and White British ethnic groups is 83% and 82% for respectively.

There is also [evidence](#) that ethnic minority households (20% of all households) are more likely to be in fuel poverty than white households (13%) as of 2019, although tend to have a lower average fuel poverty gap (the reduction in fuel costs needed for a household to not be in fuel poverty).

Income and disability. There is a disability pay gap in the UK, measured as the gap between median pay for disabled employees and non-disabled employees. It was 13.8% in 2021 and has been increasing since [2014](#) (11.7%).

Social housing, ethnicity, disability, and age. While 17% of all residents live in social rented housing in England and Wales, this share is higher for certain ethnic groups: Other Black (48%), African (44%), Gypsy or Irish Traveller (44%), Caribbean (41%), White and Black Caribbean (39%), Bangladeshi (34%), White and Black African (32%), [Arab](#) (29%) (2021). Furthermore, disabled people are more likely to live in social housing – in 2021 one quarter of disabled people aged 16 to 64 years occupied such property (24.9%) compared to 7.9% of non-disabled people aged 16 to 64 years in the [UK](#). Finally, older people (aged 65+) are more likely to live in social housing (16%) than in private rented [property](#) (6%).

Has there been any consultation with, or input from, customers / service users or other stakeholders? If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

This AQAP was prepared with the support and agreement of the following departments and wider stakeholders: Strategic Planning (Spelthorne Borough Council, or SBC), Climate Change and Sustainability (SBC), Transport (SCC), Environmental

Health (SBC), Neighbourhood services / fleet (SBC), Leisure (health and wellbeing and active travel) (SBC), Heathrow Airport Ltd; and National Highways. Spelthorne Council will launch a public consultation once the draft document has been agreed and will make necessary amendments to the Plan following consultation (which will also include the Defra appraisal process).

**Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment?
If yes, what do these tell you?**

To be added after the public consultation.

Step 3 – Identifying the negative impact.

a. Is there any negative impact on individuals or groups in the community?

Barriers:

What are the potential or known barriers/impacts for the different 'equality strands' set out below? Consider:

- **Where** you provide your service, e.g. the facilities/premises;
- **Who** provides it, e.g. are staff trained and representative of the local population/users?

- **How** it is provided, e.g. do people come to you or do you go to them? Do any rules or requirements prevent certain people accessing the service?
- **When** it is provided, e.g. opening hours?
- **What** is provided, e.g. does the service meet everyone’s needs? How do you know?

* Some barriers are justified, e.g. for health or safety reasons, or might actually be designed to promote equality, e.g. single sex swimming/exercise sessions, or cannot be removed without excessive cost. If you believe any of the barriers identified to be justified then please indicate which they are and why.

Solutions:

What can be done to minimize or remove these barriers to make sure everyone has equal access to the service or to reduce adverse impact? Consider:

- Other arrangements that can be made to ensure people’s diverse needs are met;
- How your actions might help to promote good relations between communities;
- How you might prevent any unintentional future discrimination.

AQAP measure	Positive Impacts on equality and diversity identified ¹	Solutions (ways in which you could mitigate the impact)
All measures target air pollution reduction	<p>Scientific evidence shows that poor air quality poses risks for pregnant women and their babies, as it can impair normal foetus development.</p> <p>Older people are also at greater risk, as poor air quality may increase the susceptibility to stroke,</p>	NA

¹ **Age** (including children, young people and older people), **Disability** (including carers), **Gender** (men and women), **Race** (including Gypsies & Travellers and Asylum Seekers), **Religion or belief** (including people of no religion or belief), **Gender Reassignment** (those that are going through transition: male to female or female to male), **Pregnancy and Maternity**, **Sexual Orientation** (including gay, lesbian, bisexual and heterosexual).

	<p>dementia, cancer, various chronic conditions such as respiratory and cardiovascular diseases, and premature mortality.</p> <p>For children poor air quality can lead to developing lifelong, chronic conditions, such as poorly developed lungs, asthma, high blood pressure, inattention and hyperactivity, and mental illness.</p> <p>People with existing health conditions (which are often registered as having a disability) are also more susceptible to the harmful effects of air pollution.</p> <p>All measures included in the updated AQAP for Spelthorne aim to reduce the emission of, or exposure to, harmful air pollution. In doing so, the AQAP will have disproportionately higher positive effects for these groups than for others due to their inherent higher vulnerability to poor air quality.</p> <p>In the UK, and England in particular, deprived groups (determined largely based on income and employment factors) also tend to live in locations which are of higher pollutant concentrations. While there are no data for Spelthorne, a recent report for London (2023) confirms this tendency. In London, areas with the lowest NO₂ and PM_{2.5} concentrations have a disproportionately white</p>	
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	population. Deprived groups will, overall, benefit more from air quality improvement than non-deprived ones.	
Measure 18 on the promotion of alternative travel.	Under the measure, older people, disabled people, Ukrainian refugees, and young people under 20 are eligible for free bus passes. In this way, we aim to not only promote low-carbon transport to decrease negative impacts on climate and air quality but also do it inclusively. This is also an important measure in the overall package of measures which make up the AQAP, as it balances other measures which may be less accessible to particular groups (for example cycling measures which may not be feasible for people with disabilities).	NA
Under measure 19 Spelthorne plans to work with Knowle Green Estates and suppliers to promote retrofit, insulation, energy efficiency and adaptation measures in housing. The existing Surrey scheme Home Upgrade Grant provides financing to low-income or stretched-income households with hard-to-heat properties.	This measure is targeted at the Borough's social housing stock. A higher proportion of residents of social housing fall into one or more of the protected characteristics, relative to the population as a whole (<i>see Step 2 for context</i>). Those who need support most of all, such as low-income households, with a higher proportion of older people, people with disabilities, and representatives of BAME communities, will have access to the benefits provided by the installation of energy efficiency measures.	NA
AQAP measure	Barriers for/Negative Impacts on equality themes identified	Solutions (ways in which you could mitigate the impact)
Measure 6: Promote access to grant funding for renewable energy installations for residents including	1. Affordability. The Solar Together scheme is currently closed to new applications. The scheme does not offer grant funding, it is an able-to-pay	1. It is important to ensure that people with low income (among which people with disabilities and BAME

<p>Solar Together (source: Surrey County Council Greener Futures Delivery Plan).</p> <p>Measures on energy efficiency for residential buildings (7, 19).</p>	<p>scheme self-funded by households. Marketing of the scheme was multi-channel (mail-outs, social media and digital marketing, newspaper adverts, posters, etc.) and targeted towards households identified as being more able to pay. Future funding rounds are currently being considered. Should the scheme re-open and provided grant funding is not available, there is a risk the scheme will proportionately benefit higher-income households. At the same time, a greater proportion of people with disabilities and BAME communities fall within lower income groups (see <i>Step 2 for context</i>), and hence these people may be less able to purchase renewable energy system (RES) installations without grant support, and hence less able to capture the benefits of reduced energy bills.</p> <p>Existing research indicates that unless social inequalities are addressed at the early stages, RES projects alone will not achieve equity. Evaluation studies have found that upfront capital support, i.e. grants, was the most cost-effective option, benefitting those in fuel poverty, while it is not always a preferred form of support.</p> <p>2. Other barriers. Another issue relates to achieving physical access to homes, in particular for older people or those with disabilities. These groups may feel more vulnerable and be less willing to have workers come into their homes, and hence may be less likely to apply for RES and energy efficiency schemes.</p>	<p>communities are more greatly represented (<i>see Step 2 for context</i>) have equal access to the benefits of such schemes. As Spelthorne Borough Council is not the authority designing the measure, its ability to influence the design of the Solar Together scheme is limited. However, we will consider these risks in our programs, and monitor and evaluate a recipient profile and any access issues under the ongoing schemes (e.g. under measure 19). It is worth noting that the Solar Together scheme reduces energy prices for participants and overall has net positive economic effects for the population. The scheme does not make pricing conditions for lower-income people worse. Furthermore, the Solar Together measures sit alongside other measures which may be more accessible or even targeted towards more vulnerable households (e.g. Measure 7).</p> <p>2. According to Surrey Council, installers would make reasonable adjustments and considerations when working at a property and installing to accommodate any disability needs. There are processes in place around</p>
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	<p>Some households in fuel poverty are harder to reach than others due to difficulties in using computers, digital exclusion, or disabilities. As a result, they will be less represented among the participants in energy and energy efficiency schemes. Digital exclusion is more typical for older people.</p>	<p>recognising and helping vulnerable customers.</p> <p>Surrey County Council will support the groups that feel more vulnerable (e.g. free phone advice helpline, and energy advice support at local offices).</p> <p>Forms of communication on available opportunities should meet the needs of people with disabilities and those who are not comfortable using a computer. Spelthorne Council will ensure that the ways of communication on existing and future programs meet the needs of those groups.</p>
<p>Measure 10: Emissions-based parking tariffs (considered but not at the development stage).</p>	<p>If implementing a tariff approach based on vehicle emissions, lower-income groups who are more likely to drive older, cheaper and more polluting cars will have to pay more. As noted above, proportionately more households with protected characteristics fall into lower income categories, and hence will be disproportionately affected (<i>see Step 2 for context</i>).</p> <p>Additionally, this will penalize those who rely on the use of private transport more and have fewer alternative options, such as pregnant women,</p>	<p>When designing this measure, we will consider appropriate mitigation actions. For example, one option could be where the owners of polluting cars will pay the same parking tariffs in Spelthorne as currently, but owners of cleaner cars will pay a discounted tariff (as it currently works in Woking, Surrey). This way, we will create an incentive rather than a penalty.</p>

	<p>people with disabilities or people with young children.</p>	<p>It is worth noting that this measure will sit alongside other AQAP measures, including measures to incentivise the elderly to use public transport by providing free bus passes. Furthermore, public transport in Spelthorne is equipped for the needs of people with disabilities.</p> <p>To mitigate negative impacts on pregnant women and people with young children, one option may be to consider not applying variation in charges around facilities those groups need to use – e.g. local doctors or hospitals. This will be considered if / when this measure moves forward to detailed consideration.</p>
<p>Measure 12 is encouraging taxi companies and drivers to invest in electric fleets. With support from the Defra Air Quality Fund, Spelthorne authorities will subsidise the purchase of EVs by drivers and companies. In total, we expect 40 vehicles to be procured and divided between Spelthorne, Guildford, Waverley, Epsom and Ewell, Reigate and Banstead, Elmbridge and Woking. Drivers or companies will cover part of the cost over the subsidy period, and</p>	<p>EVs are generally newer and more expensive, therefore less affordable for lower-income groups. The salary range for taxi drivers in the UK is £14,000-30,000 depending on experience. Hence, less experienced drivers are more likely to be in the low-income category. Importantly, Asian or Asian British were the largest ethnic group of taxi and cab drivers, having grown from 29% in 2010 to 42% in 2022 (England).</p> <p>Any measure which encourages EV uptake has the potential to place a high cost on a low-income group with a high representation of BAME communities. While operating costs are often</p>	<p>The policy does not ban or penalize other types of cars. The purchase of EVs with grant support is optional, hence in theory only those who can afford it will take it up, while drivers of non-EVs will not be made worse off.</p> <p>Grants will only be provided for a purchase of 4-5 cars in Spelthorne, which is also a small change to the fleet.</p>

<p>when the subsidy ends can choose to cover all costs or return the vehicle.</p>	<p>lower for EVs than for petrol or diesel cars, with an average saving of £700 a year, there still is an issue of upfront costs of purchasing an EV.</p>	<p>Furthermore, it should be noted that Spelthorne Borough Council amended the taxi and private hire vehicle licencing policy to accommodate fully electric vehicles in 2022 which had not been allowed before.</p> <p>At this stage, no additional mitigation action is needed, however, if we develop other measures that may penalise taxi drivers for more polluting cars in the future, we will consider how they may impact low-income groups, incl. representatives of BAME communities.</p>
<p>Measures 13 and 15 plan to raise awareness of poor air quality, associated health implications, and activities that affect air quality (idling and solid fuel burning).</p>	<p>It is more difficult to reach certain groups due to digital exclusion that is more typical for them, e.g. older people. As a result, their awareness of air quality, its health effects and harmful activities may be less than other groups.</p>	<p>Spelthorne Borough Council used different ways to promote the schemes. Campaign materials are available offline, as Spelthorne Borough Council provides the Bulletin magazine in print to residents and community notice boards.</p>
<p>Several measures (16 and 17) aim to change transport infrastructure – in particular, improvements of walking and cycling infrastructure, and junction improvements to increase capacity and improve road layouts linked to new developments.</p>	<p>As infrastructure improves for certain groups, e.g. cyclists or drivers, this may not be usable for people with disabilities, or older people, potentially reducing road space for private vehicles and therefore making their journey longer, increasing the risk of severance from key amenities.</p>	<p>When planning infrastructure changes, Spelthorne authorities will follow “Healthy Streets for Surrey” requirements and guidance, requirements of the Design Manual for Roads and Bridges, and “Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure”. This will ensure that</p>

	<p>A specific risk associated with infrastructure changes is the potential use of raised planters as a part of the Liveable Neighbourhoods programme, which may prevent access by emergency services to particular places, which may have a greater impact on several protected characteristics who rely on these services more heavily.</p>	<p>severance issues are considered for persons with protected characteristics and do not deteriorate.</p> <p>There was an Equality impact assessment for the Surrey Transport Plan identifying and addressing the impacts on protected characteristics. We expect the design feasibility study for the Local Walking and Cycling Infrastructure Plan will include an Equality impact assessment for each route.</p> <p>Additionally, public consultation is ongoing from 4th March to 5th April 2024 on the West Sunbury zone (Cedar Way, Mill Farm Avenue and Percy Bryant Road) within which we identified the need for improvements. We will consider any comments made regarding potential effects for people with disabilities.</p>
<p>Measures 18, 24, 25, 26, 27 and 28 seek to promote active travel, such as walking and cycling, through regular guided cycle rides, route suggestions for independent rides, and subsidised cycle training at schools.</p>	<p>Lower-income groups, within which a greater proportion of persons with protected characteristics may fall (<i>see Step 2 for context</i>), may be less able to engage in cycling activities due to the upfront costs involved or due to other factors such as health issues or disabilities.</p>	<p>There is a volunteer initiative “Talking Tree” that upcycles bikes and gives them to new owners, as well as organises repair sessions. While it is not run by Spelthorne authorities, it can help low-income groups obtain a bike.</p>

	<p>In terms of awareness, it is more difficult to reach certain groups due to digital exclusion that is more typical for them, e.g. older people^{Error! Bookmark not defined.}. As a result, their participation in such measures may be lower.</p> <p>Several measures seek to encourage greater active travel (e.g. cycling/walking), which certain groups will face a greater challenge to take up due to physical or mental limitations.</p>	<p>Spelthorne Borough Council used different ways to promote the schemes. The Borough Bulletin publication is available online and goes out in hard copy to all households. The webpage gives details of how to get accessible format copies by telephone from the Communications team.</p> <p>Surrey County Council have an arrangement via the Community Recycling Centre re-use shop to sell reconditioned bicycles at a lower cost to residents than a new bicycle. Surrey County Council are also considering the feasibility of short-term bike hire schemes.</p> <p>The measures also aim to encourage 'wheeling' generally, to ensure greater inclusivity. Again, these measures sit alongside other measures in the Plan which aim to promote greener transportation for all groups (e.g. lower bus fares).</p>
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Step 4 – Changes or mitigating actions proposed or adopted.

Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure? What changes or mitigating actions are proposed?

The above assessment demonstrates that none of the AQAP policies currently in effect will affect the groups assessed. There are risks that some future measures have the potential to have negative impacts (e.g. emissions based parking), and we plan to consider them when developing those measures. That said, in many cases mitigation actions have already been taken and when the Plan is considered as a whole, some measures act as mitigation measures for others. Two policies have a direct positive benefit on equality themes, and air quality improvement in general will have larger positive effects for older people, pregnant women and their babies, and young children than the wider population. All other impacts and benefits have been identified as neutral.

Step 5 – Monitoring

How are you going to monitor the existing service, function, policy or procedure?

Implementation of AQAP and its impacts on equality and diversity of population will be a part of the annual Authority monitoring [report](#) that is produced annually and sets out Spelthorne Borough Council's progress on plan preparation and assesses the effectiveness of the policies and objectives on air quality.

Local air quality monitoring results and an annual update on measures within the Air Quality Action Plan will be provided within the Council's Annual Status Report which Spelthorne Borough Council is required to submit to Defra as part of the Local Air Quality Management regime.

Information on local air quality for residents who are vulnerable to episodes of poor air quality will continue to be provided via an alert service. At the time of writing this is the [Air Alert](#) service.

Part C – Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
<p>Measures on energy efficiency for residential buildings (7, 19). Potential issues around access to home, for older people or those with disabilities. Digital exclusion issues.</p>	<p>Surrey County Council will support the groups that feel more vulnerable (e.g. free phone advice helpline, and energy advice support at local offices).</p> <p>Spelthorne Council will ensure that the ways of communication on existing programs meet the needs of people with disabilities or those who face digital exclusion. We will monitor the delivery of the existing schemes in terms of possible equality and diversity issues.</p>	<p>Lead - Surrey County Council</p> <p>Support from Spelthorne Borough Council:</p> <p>Sustainability and Climate Change Officers</p> <p>Assets Team Officers</p> <p>Building Control Officers</p> <p>Environmental Health Officers regarding landlord and agency owned properties with poor EPC characteristics, that may be</p>	<p>By the end of the Air Quality Action Plan period - 2029</p>

		subject to enforcement and in providing information on relevant schemes to improve the condition of residents' properties.	
<p>Measure 10: Emissions-based parking tariffs (being considered but not at the development stage). There is a risk that low-income groups who are more likely to have cheaper and more polluting cars will have to pay more. Additionally, this will penalise those who rely on the use of private transport more and have fewer options, such as pregnant women, or people with young children.</p>	<p>When considering the feasibility of this measure, we will consider the option under which owners of polluting cars will pay the same parking tariffs in Spelthorne as before, and owners of cleaner cars will pay a discounted tariff. To mitigate negative impacts on pregnant women and people with young children, it might not apply around facilities those groups need to use – e.g. local doctors or hospitals. This will be considered if / when this measure moves forward to detailed consideration.</p>	<p>Lead - Neighbourhood Services- Parking Services Manager</p> <p>Support from:</p> <p>Economics Officers</p> <p>Sustainability and Climate Change Officers</p> <p>Environmental Health Pollution Control Officers.</p>	<p>By the end of the Air Quality Action Plan period - 2029</p>

Equality Analysis approved by:

Group Head:	Date:
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