

Public Document Pack

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A meeting of the **Cabinet** will be held in the Committee Rooms, East Pallant House (subject to current Government guidance) on **Tuesday 11 January 2022 at 9.30 am**

MEMBERS: Mrs E Lintill (Chairman), Mrs S Taylor (Vice-Chairman), Mr R Briscoe, Mr A Dignum, Mrs P Plant, Mr A Sutton and Mr P Wilding

AGENDA

- 1 **Chair's Announcements**
The Chair will make any specific announcements for this meeting and advise of any late items which due to special circumstances will be given urgent consideration under Late Items.
- 2 **Approval of Minutes** (Pages 1 - 6)
The Cabinet is requested to approve as a correct record the minutes of its meeting on Tuesday 7 December 2021.
- 3 **Declarations of Interests**
Members are requested to make any declarations of disclosable pecuniary, personal and/or prejudicial interests they might have in respect of matters on the agenda for this meeting.
- 4 **Public Question Time**
In accordance with Chichester District Council's scheme for public question time the Cabinet will receive any questions which have been submitted by members of the public in writing by noon two working days before the meeting. Each questioner will be given up to three minutes to ask their question. The total time allocated for public question time is 15 minutes subject to the Chair's discretion to extend that period.
- 5 **Corporate Plan 2022/25 - Cllr Sharp Recommendation from the Overview and Scrutiny Committee**
At the Overview and Scrutiny Committee held on 16 November 2021 it was proposed by Cllr Sharp and seconded by Cllr Moss that the Committee recommend to Cabinet that the Corporate Plan success measures include safe jobs, in that the Council promote green jobs in the sectors of renewable, retrofitting and the circular economy. The Committee then voted on this proposal which was carried.

Cabinet are therefore asked to consider the following recommendation:

That the Corporate Plan success measures include safe jobs, in that the Council promote green jobs in the sectors of renewable, retrofitting and the circular economy.

RECOMMENDATIONS TO COUNCIL

6 **Corporate Plan 2022-25** (Pages 7 - 29)

The Cabinet is requested to consider the report and its appendices and make the following recommendations to Full Council:

1. That the Council be recommended to approve the Corporate Plan for 2022-2025 as set out in appendix 1.
2. That the new project proposals for 2022-2023, as set out in appendices 2 and 3, be agreed.
3. That, subject to the Cabinet's agreement in para 2.2 to approve the new project proposals for 2022-2023, the Council be recommended to approve expenditure of £273,000 for the projects set out in para 5.6 of this report, of which £245,000 will be funded through the efficiencies programme and £28,000 from the Council's General Fund Reserve.

7 **Chichester District Council Equality Strategy 2022-26** (Pages 31 - 47)

The Cabinet is requested to consider the report and its appendix and make the following recommendations to Full Council:

That the Council be recommended to adopt the Chichester District Council Equality Strategy 2022-26 (including the Council's equality objectives).

8 **Planting Trees Outside of Woodlands Project - DEFRA Funding** (Pages 49 - 53)

The Cabinet is requested to consider the report and its appendix and make the following recommendations to Full Council:

1. That Cabinet recommend to Council that a budget of £290,240 is approved for the DEFRA funded Trees Outside Woodland Project.
2. That, subject to Council approving recommendation 3.1, Cabinet approves expenditure for the project officer and the following two pilot projects:
 - a. £116,450 for the project officer
 - b. £60,040 for the Subsidised Trees pilot
 - c. £28,500 for the Urban Tree pilot.

The Cabinet is requested to make the following resolution:

That Cabinet delegates authority to the Director of Planning and Environment, following consultation with the Cabinet Member for the Environment and Chichester Contract Services, to accept an increase in the approved budget and expenditure for any of the four pilot projects up to a total of £50,000 per pilot if additional funding is offered by DEFRA or by another participating local authority.

KEY DECISIONS

9 **South Downs National Park Authority Renewal of Development Management Agency Agreement** (Pages 55 - 158)

The Cabinet is requested to consider the report and its exempt appendices and make the following resolutions:

1. To approve the Council entering into a new Agreement with the South

Downs National Park Authority (SDNPA) under section 101 of the Local Government Act 1972 to enable the Council to continue to provide a development management service to the SDNPA for up to two years initially, until 30 September 2024.

2. To delegate authority to the Director of Planning and Environment to agree an extension of the Section 101 Agreement for a further two years up until 30 September 2026 if the arrangements are working effectively and agreeable to both authorities.
3. To authorise the Director of Planning and Environment to conclude negotiations on the Section 101 Agreement including the Service Level Agreement, related Protocols and proposed basis for payments set out in Appendix 1; and then to complete the Agreement.

The appendices for Agenda Item 9 are restricted and are attached for members of the Council and relevant officers only (printed on salmon paper)].

OTHER DECISIONS

10 Draft for adoption revised Air Quality Action Plan (Pages 159 - 283)

The Cabinet is requested to consider the report and its appendices and make the following resolutions:

1. That Cabinet notes the public consultation responses and approves the revised Air Quality Action Plan for adoption.
2. That Cabinet approves the revocation of the Stockbridge and Orchard Street Air Quality Management Areas and the decommissioning of the Lodsworth air quality monitoring station.

11 Engagement Response to National Highways A259 Chichester to Emsworth Cycling and Walking Route (Pages 285 - 290)

The Cabinet is requested to consider the report and its appendices and make the following resolution:

That having considered the recommendation from Environment Panel (para 9.4), Cabinet is recommended to indicate the Council's support for National Highways' proposed walking and cycling improvements to the A259 Chichester to Emsworth.

12 Late Items

- a) Items added to the agenda papers and made available for public inspection
- b) Items which the Chair has agreed should be taken as matters of urgency by reason of special circumstances to be reported at the meeting

13 Exclusion of the Press and Public

There are no restricted items for consideration at this meeting however the appendices for Agenda Item 9 are restricted and are attached for members of the Council and relevant officers only (printed on salmon paper)].

NOTES

- (1) The press and public may be excluded from the meeting during any item of business wherever it is likely that there would be disclosure of 'exempt information' as defined in section 100A of and Schedule 12A to the Local Government Act 1972.
- (2) The press and public may view the report appendices which are not included with their copy of the agenda on the Council's website at [Chichester District Council - Minutes, agendas and reports](#) unless they contain exempt information.
- (3) Subject to the provisions allowing the exclusion of the press and public, the photographing, filming or recording of this meeting from the public seating area is permitted. To assist with the management of the meeting, anyone wishing to do this is asked to inform the chairman of the meeting of their intentions before the meeting starts. The use of mobile devices for access to social media is permitted, but these should be switched to silent for the duration of the meeting. Those undertaking such activities must do so discreetly and not disrupt the meeting, for example by oral commentary, excessive noise, distracting movement or flash photography. Filming of children, vulnerable adults or members of the audience who object should be avoided. [Standing Order 11.3 of Chichester District Council's Constitution]
- (4) Subject to Covid-19 Risk Assessments members of the public are advised of the following:
 - Where public meetings are being held at East Pallant House in order to best manage the space available members of the public are in the first instance asked to listen to the meeting online via the council's committee pages.
 - Where a member of the public has registered a question or statement they will be invited to submit the question or statement in advance to be read out by Democratic Services. They may attend the meeting but will be asked to sit in an allocated seat in the public gallery.
 - It is recommended that all those attending take a lateral flow test prior to the meeting.
 - All those attending the meeting will be required to wear face coverings and maintain social distancing when in the building/meeting room.
 - Members of the public must not attend any face to face meeting if they or a member of their household have Covid-19 symptoms and/or are required to self-isolate.
- (5) A key decision means an executive decision which is likely to:
 - result in Chichester District Council (CDC) incurring expenditure which is, or the making of savings which are, significant having regard to the CDC's budget for the service or function to which the decision relates or
 - be significant in terms of its effect on communities living or working in an area comprising one or more wards in the CDC's area or
 - incur expenditure, generate income, or produce savings greater than £100,000

NON-CABINET MEMBER COUNCILLORS SPEAKING AT THE CABINET

Standing Order 22.3 of Chichester District Council's Constitution provides that members of the Council may, with the Chairman's consent, speak at a committee meeting of which they are not a member, or temporarily sit and speak at the committee table on a particular item but shall then return to the public seating area.

The Leader of the Council intends to apply this standing order at Cabinet meetings by requesting that members should *normally* seek the Chairman's consent in writing by email in advance of the meeting. They should do this by noon on the Friday before the Cabinet meeting, outlining the substance of the matter that they wish to raise. The word normally is emphasised because there may be unforeseen circumstances where a member can assist the conduct of business by his or her contribution and where the Chairman would therefore retain their discretion to allow the contribution without the aforesaid notice.

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Public Document Pack Agenda Item 2



Minutes of the meeting of the **Cabinet** held in the Committee Rooms, East Pallant House on Tuesday 7 December 2021 at 9.30 am

Members Present Mrs S Taylor (Vice-Chairman), Mr A Dignum, Mrs P Plant, Mr A Sutton and Mr P Wilding

Members Absent Mrs E Lintill and Mr R Briscoe

In attendance by invitation

Officers Present Mr N Bennett (Divisional Manager for Democratic Services), Mr K Carter (Divisional Manager, CCS), Mr T Day (Environmental Coordinator), Mr L Foord (Divisional Manager for Communications, Licensing & Events), Mr D Henly (Senior Engineer (Coast and Water Management)), Miss L Higenbottam (Democratic Services Manager), Mrs J Hotchkiss (Director of Growth and Place), Mr P Jobson (Taxation Manager), Mrs S Peyman (Divisional Manager for Culture), Mrs M Rogers (Benefits Manager), Mrs L Rudziak (Director of Housing and Communities), Mrs D Shepherd (Chief Executive) and Mr J Ward (Director of Corporate Services)

89 **Chair's Announcements**

In Cllr Lintill's absence Cllr Taylor took the Chair and welcomed everyone to the meeting and read the fire evacuation procedure.

Apologies for absence were received from Cllr Briscoe and Cllr Lintill.

90 **Approval of Minutes**

RESOLVED

That the minutes of the Cabinet meeting held on 2 November 2021 be approved as a correct record.

91 **Declarations of Interests**

There were no declarations of interest.

92 **Public Question Time**

The following public questions were received (responses indicated in italics):

Question from Stuart Tappin (read by Democratic Services):

As a way of meeting the UK's commitment for a more sustainable future, and in response to the Climate Change Emergency, professional organisations such as the Institution of Structural Engineers and the Royal Institute of British Architects have advocated the retention and re-use of buildings over demolition and re-build. Can the Council confirm that they will now re-consider proposals for The Southern Gateway and put the retention and re-use of perfectly sound buildings such as the bus garage at the centre of their proposals?

Answer from Cllr Dignum:

Thank you Mr Tappin for your question , the report today sets out the progress for the project and currently no options going forward have been dismissed in relation to the sites.

Question from Bob Mousley:

Its disappointing that the Southern Gateway documents and Council discussion are not available for the public's information .

However ;

“ Given that the Southern Gateway Project will not proceed in its current form, Is now the time to step back and take a wide ranging holistic view on all the current issues of development, sustainability, climate change etc affecting the Chichester District over the next 5 – 30 years. ? “

The objective would be to produce a flexible matrix Masterplan which could be amended as new information and technologies emerged.

A step back for say 24 months in order to produce a grand vision Masterplan for the next 30 years.

This would enable a future Southern Gateway to be developed in context and as part of whole cohesive Masterplan for the area.

Answer from Cllr Dignum:

Firstly, can I reassure you that the Southern Gateway project is being actively progressed by the Council. It is important to note that the Southern Gateway Masterplan is not prescriptive as to the uses that would be acceptable for many of the sites and so should be viewed with a degree of flexibility. The masterplan does not therefore need to be reproduced. Proposals that come forward for the Southern Gateway will also have to meet the policies and standards of the adopted and emerging local plans and so matters such as new technologies, sustainability and

climate change together with normal development management requirements will be fully addressed through the planning process.

Cllr Taylor invited Mr Mousley to ask a supplement question. Mr Mousley did not have a second question.

93 **Corporate Plan 2022/25 - Cllr Sharp Recommendation from the Overview and Scrutiny Committee**

Cllr Taylor confirmed that this item was deferred to January 2022.

94 **Determination of the Council Tax Reduction Scheme for 2022-2023**

Cllr Wilding introduced the item.

In a vote the following recommendation and resolutions were agreed:

RECOMMENDED TO COUNCIL

That the proposed Council Tax Reduction Scheme for 2022-2023 be approved by Full Council.

RESOLVED

That Cabinet delegate approval for mid-year changes in the Scheme, where it is deemed appropriate to the Director for Housing & Communities following consultation with the Director of Corporate Services and Cabinet Member for Finance, Corporate Services and Revenues and Benefits.

95 **Determination of the Council Tax Base 2022-2023**

Cllr Wilding introduced the item.

In a vote the following resolutions were agreed:

RESOLVED

1. In order to comply with section 35 of the Local Government Finance Act 1992, that the following resolutions be made;
2. No item of expenditure shall be treated as 'special expenses' for the purposes of section 25 of the Local Government Finance Act 1992.
3. This resolution in (2.2) shall remain in force for the 2022-2023 financial year.
4. The calculation of the Chichester District Council's taxbase for the year 2022-2023 be approved.
5. The amounts calculated by Chichester District Council as its council taxbase be those set out in appendices 1 and 2 to this report.

96 **Fees and Policies under The Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020**

Cllr Sutton introduced the item.

Cllr Taylor requested clarification of how many sites would be included. Mr Foord confirmed that the new legislation and associated criteria was being reviewed but estimated around 20 sites, although this might vary.

In a vote the following resolution was agreed:

RESOLVED

That the proposed fee and separate supporting Fees and Determination Policies be approved.

97 Expenditure under the Planting Trees Outside Woodlands Project

Cllr Plant introduced the item. She explained the recommendation had been amended to request £37,000 for the Agroforestry and Orchards Pilot and £48,250 for the Hedgerow Tree Pilot.

Cllr Dignum requested further information on the £400,000 as referenced at 3.2 of the report. Mrs Shepherd explained that a full breakdown could be provided at a later date.

Cllr Potter was invited to speak. He asked whether there was scope for further applications. Mr Day explained that the overall project budget had been fixed by DEFRA but that there was the possibility of any underspends by other authorities being made available next financial year.

In a vote the following resolution was agreed:

RESOLVED

That Cabinet delegates authority to the Director of Planning and Environment following consultation with the Cabinet Member for the Environment and Chichester Contract Services for the release of grant funding from DEFRA for the following two projects;

1. £37,000 for the Agroforestry and Orchards Pilot and;
2. £48,250 for the Hedgerow Tree Pilot.

98 Late Items

There were no late items.

99 Urgent Decision Notice - Trade Waste Bins

Cllr Wilding asked whether there would be scope for bidding for more local authority contracts. Mr Carter explained it was not considered this time.

Cllr Sharp was invited to speak. She asked whether food waste would be included in the contract. Mr Carter explained that the food waste collection contract is managed

by the catering team at West Sussex County Council whose food waste contract is due for re-tender in two years time.

RESOLVED

That the Urgent Decision Notice relating to Trade Waste Bins be noted.

100 **Exclusion of the Press and Public**

Cllr Taylor proposed and read the part II resolution in relation to agenda items 13, 14, 15, 16 and 17. This was unanimously agreed by the Cabinet voting to go into part II.

RESOLVED

That with regard to agenda items 13,14, 15, 16 and 17 the public including the press should be excluded from the meeting on the grounds of exemption in Schedule 12A to the Local Government Act 1972 namely paragraph 3 (Information relating to the financial or business affairs of any particular person (including the authority holding that information) and because, in all the circumstances of the case, the public interest in maintaining the exemption of that information outweighs the public interest in disclosing the information.

101 **Beach Management Plan (BMP) - Shingle Replenishment 2022-2024**

Cllr Plant introduced the item.

In a vote the following resolution was agreed:

RESOLVED

That Cabinet approve the recommendations as set out in section 2.1 of the report.

102 **Chichester Contract Service: Procurement of new refuse collection vehicles**

Cllr Plant introduced the item.

In a vote the following resolution was agreed:

RESOLVED

That Cabinet approve the recommendations as set out in sections 2.1 and 2.2 of the report.

103 **Leisure Services Contract Update**

Cllr Briscoe introduced the item.

In a vote the following resolution was agreed:

RESOLVED

That Cabinet approve the recommendations as set out in section 2.1 of the report.

104 **Southern Gateway Project**

Cllr Dignum introduced the item.

Cllr Moss was invited to speak.

In a vote the following resolution was agreed:

RESOLVED

That Cabinet approve the recommendations as set out in sections 3.1-3.9 of the amendment to the report as circulated to members at the meeting.

105 **Urgent Decision Notice - Westgate Decarbonisation Project**

RESOLVED

That the Part II Urgent Decision Notice relating to the Westgate Decarbonisation Project be noted.

The meeting ended at 10.45 am

CHAIRMAN

Date:

Chichester District Council

THE CABINET

11 January 2022

Corporate Plan 2022-25

1. Contacts

Report Author:

Andy Buckley - Corporate Improvement and Facilities Manager

E-mail: abuckley@chichester.gov.uk

Cabinet Member:

Eileen Lintill - Leader of the Council

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2. Recommendation

2.1 That the Council be recommended to approve the Corporate Plan for 2022-2025 as set out in appendix 1.

2.2 That the new project proposals for 2022-2023, as set out in appendices 2 and 3, be agreed.

2.3 That, subject to the Cabinet's agreement in para 2.2 to approve the new project proposals for 2022-2023, the Council be recommended to approve expenditure of £273,000 for the projects set out in para 5.6 of this report, of which £245,000 will be funded through the efficiencies programme and £28,000 from the Council's General Fund Reserve.

3. Background

3.1 The Corporate Plan is an internal business planning document that sets out the Council's future priorities and objectives for the period 2022-2025.

3.2 The existing Corporate Plan took effect from 1 April 2018 and originally ran until 31 March 2021. In January 2021 Council agreed to extend that Plan for one year to allow the Council to focus on its interim COVID-19 priorities and recovery plans.

4. Outcomes to be Achieved

4.1 A clearly defined plan ensures that the Council manages its resources effectively and that enough capacity exists to deliver key projects. It provides a focus for the council's Cabinet so it can plan its work, and the framework for the council's scrutiny function to hold the Cabinet to account.

4.2 Performance will be reviewed regularly to ensure the council is on target to achieving its objectives. The council's Senior Leadership Team and the Overview and Scrutiny Committee monitor progress against the key projects, budgets and performance measures on a regular basis, taking action where any activities are behind schedule or target. A report will also be produced annually to highlight the key achievements.

4.3 Each year the Plan is reviewed to take into account any emerging issues and challenges whilst ensuring it remains relevant and affordable.

5. Proposal

5.1 The Corporate Plan sets out the council's priorities for the next three years. The Plan works alongside the Financial Strategy to ensure that staffing and financial resources are allocated appropriately.

5.2 The economic outlook is a challenging backdrop for the aspirations of this Council during the life of this new Plan. In recognition of this, the Plan is first and foremost designed around the Council's obligations to provide its core statutory services.

5.3 However, the Plan also targets certain non-statutory areas that are high priority areas for our residents and businesses. When determining these local priorities consideration has been given to the Council's ability to directly influence outcomes to ensure that finite resources are allocated to the most appropriate areas.

5.4 The Plan will be considered by Full Council on 25 January 2022. Once considered and adopted it will take effect from 1 April 2022 and will run until 31 March 2025.

5.5 New projects for 2022/23 are also proposed. Initial Project Proposal Documents (IPPDs) have been prepared for each new project. The proposed IPPDs are:

- (a) Contract Services Efficiencies Programme
- (b) 2023 Member induction

5.6 The Cabinet is asked to consider and recommend the Corporate Plan 2022-2025 (appendix 1) to Council, and recommend that the IPPDs (appendices 2 and 3) be agreed and that Council approve expenditure as follows:

- Contract Services Savings Programme - £245,000 to manage, plan, develop and implement several of the workstreams included within the efficiencies programme for Contract Services. These costs will be netted off against the savings in 2022-23, with any underspend to be carried forward into future years.
- 2023 Member Induction – £28,000 to fund one-off costs as part of the member induction process set out in appendix 3.

5.7 In addition to the above there are likely to be further projects, subject to approval, that will come forward in early 2022. They include an options appraisal of East Pallant House, a corporate stock condition survey, and the decarbonisation of council assets.

6. Alternatives Considered

6.1 The absence of an adopted Corporate Plan increases the risk of resources being poorly allocated which in turn would create poorer outcomes for our residents, businesses and visitors.

7. Resource and Legal Implications

7.1 The new Plan will ensure that the Council aligns its resources with its priorities, and revenue budgets and new capital projects will be expected to support and deliver

the aims and objectives set out in the Plan. An annual review will take place to ensure that the key projects and actions remain relevant and important.

7.2 Approval is requested to spend an estimated £245,000 to deliver the savings included within the Contract Services efficiencies programme. These costs will be fully offset against the savings in 2022-23, although the timing of the expenditure may go beyond 2022-23 in which case any remaining funds will be carried forward into future years.

7.3 Additionally a one-off budget of £28,000 is requested to support the Member Induction Programme for 2023.

8. Consultation

8.1 Consultation has been carried out with all Councillors, the Senior Leadership Team, and Divisional Managers.

8.2 All Councillors were invited to a briefing session to discuss the draft Corporate Plan on 3 August 2021. Following that briefing, group leaders were asked to review the document with their groups and provide written feedback by 17 September 2021. Finally the Overview and Scrutiny Committee considered a draft of the Plan at its meeting on 16 November 2021.

8.3 All feedback, comments and recommendations have been reviewed and considered in the preparation of this Plan.

9. Community Impact and Corporate Risks

9.1 The Corporate Plan aims to support and enhance the social, economic and environmental wellbeing of the District. The council's annual workplans will be produced in support of the objectives outlined in the Plan.

9.2 A mid-year Task and Finish Group will meet annually to review the progress being made against the Plan, and an end of year Annual Report will be published to demonstrate the achievements made in the previous year and to highlight the key projects for the year ahead.

10. Other Implications

10.1 Whilst the Plan itself has no specific implications, many of the projects within it will provide positive benefits that either will, or have already been, outlined in specific reports for each project.

	Yes	No
Crime and Disorder		X
Climate Change and Biodiversity		X
Human Rights and Equality Impact		X
Safeguarding and Early Help		X
General Data Protection Regulations (GDPR)		X
Health and Wellbeing		X
Other		X

11. Appendix

Appendix 1 - Corporate Plan 2022-2025

Appendix 2 – Contract Services Efficiency Savings IPPD

Appendix 3 – Member Induction 2023 IPPD

12. Background Papers

12.1 None.

CHICHESTER DISTRICT COUNCIL

CORPORATE PLAN 2022-2025



OUR VISION

A stunning rural district, with vibrant local communities, where businesses can grow, residents and visitors feel supported and fulfilled, and where carbon emissions are minimised.

OUR MISSION

To support our communities by enabling a choice of quality housing to high sustainable standards, promoting growth and inward investment which protects the environment, and working with partners to maintain the outstanding quality of life available to our residents.

OUR PRIORITIES

HOMES FOR ALL	THRIVING ECONOMY	SUPPORTED COMMUNITIES	FINANCIAL PRUDENCE	A CARED-FOR ENVIRONMENT
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HOW WE WILL DELIVER

- Focus on our residents' needs
- Push for sustainable change across the District
- Work in partnership to benefit Chichester District
- Lobby for Chichester's interests both regionally and nationally
- Provide quality public services
- Make best use of our resources, including seeking grant funding
- Adopt modern and efficient working practices

CHICHESTER DISTRICT IN NUMBERS

Population of 121,500	Chichester district covers 303 square miles	59,100 homes
7,600 businesses	Average house price £415,000	Average Salary £29,400
3.6 million bins emptied each year	6,600 reported criminal offences 2020	70% of working age residents in employment
27% of the population aged 65 and over	67% of our district is located within the South Downs National Park	1,200 planning applications received in 2020

CHALLENGES FACING THE DISTRICT

- **Coronavirus** – The global pandemic has created enormous challenges both across the world and within our district, and the health implications have been tragic and devastating. It has also accelerated economic, social, and organisational change that we must recognise and respond to when shaping our services to best help our communities.
- **Resource constraints** – This council has absorbed funding reductions of 41% in cash terms since 2010-11 whilst still protecting frontline services for our residents. The coronavirus pandemic has placed further strain on the council's finances, in response to this a deep and wide-ranging efficiency savings programme is being delivered, but further work will be required to balance the Council's budgets and continue to deliver our core statutory services.
- **Infrastructure, transport and connectivity** – Local transport links and public transport routes are in need of improvement to connect our district and maintain equality of opportunity. Ensuring that there is sufficient capacity in the local wastewater infrastructure will be essential to support both existing and new housing development.
- **House Prices** – House prices across the District have grown strongly in recent years, with median house prices now standing at 14 times the median earnings for those working in the district. Consequently, young people and families are finding it harder to find homes in the district, often having to move out of the district to find cheaper housing.
- **Housing Supply** – 67% of the district is located within the South Downs National Park where additional constraints are placed upon new development. This puts greater pressure for housing upon the neighbouring areas outside of the National Park.
- **Prosperity and Inequalities** – Chichester is a prosperous place but income and health inequalities do exist. Patterns of inequality between areas have been persistent over a number of years.
- **Climate emergency** – The national Climate Change Act includes a binding target to reach 'net zero' by 2050. Whilst local government can lead this change, the public has a huge role to play. This council has adopted its own Climate Change Action Plan but will need the support of central government to finance many of the necessary actions.
- **Balancing development and sustainability** – Particularly in the context of the climate emergency and our wealth of natural assets.

OUR GUIDING PRINCIPLES



We are committed to running an organisation that puts our customers first, delivers value for money, and works with our communities to ensure we focus on what is important

We will:

- Put our customers first and seek to provide a quality experience when they use our services.
- Engage with our businesses, and residents of all ages, to understand what matters to them.
- Adopt appropriate and efficient working practices.
- Provide services that are accessible to all but digital by default.
- Promote a culture of fairness, openness and transparency.
- Use our resources responsibly and look to invest in the future of the district.
- Take into account user feedback to design services and inform decision making.
- Work with partners to respond to the needs of service users.
- Keep our staff skilled, motivated and flexible, within a supportive environment.
- Be welcoming to appropriate change.
- Provide equality of opportunity in all our activities and ensure that discrimination does not occur.

HOMES FOR ALL



A broad range of homes available for residents of all ages

WHAT WE WANT TO ACHIEVE

- Work with partners to meet housing needs across the district
- No-one sleeping rough
- Prevent homelessness through early intervention and support
- Reduce the number of placements into bed and breakfast
- Reduce fuel poverty and excess cold
- Improve the condition and energy efficiency of homes
- Address the need for specialised housing for those with care needs

HOW WILL WE ACHIEVE THIS?

- Adopt a Local Plan to ensure the right mix of homes are built for all sectors of our society to the highest achievable environmental standards
- Work with partners to improve standards in the private rented sector
- Review the current approach to maximise the delivery of affordable housing
- Work with partners to optimise the use of social rented/affordable housing in the district
- Work in partnership with the voluntary sector to provide support for our homeless and most vulnerable people
- Prioritise the provision of affordable housing in the redevelopment of Council-owned land
- Work with Hyde to deliver their Hyde 2050 Strategy
- Seek higher housing densities in appropriate locations

SUCCESS MEASURES

		Target
1.1	Enable the delivery of 1,000 new affordable homes between 2019 and 2025	More than 167 per year
1.2	Prevent homelessness for households under the 'prevention' duty	More than 50%
1.3	Relieve homelessness for households under the 'relief' duty	More than 50%
1.4	Minimise rough sleeping through long term partnership approaches that enable those at risk to get the support they need	3 or less rough sleepers
1.5	Reduce the number of placements into nightly paid accommodation	Less than 50 per year
1.6	Number of homes improved through the Financial Assistance Policy	50 or more
1.7	Provide a high level of user satisfaction through the delivery of Disabled Facilities Grants	95%
1.8	Process new housing benefit and council tax reduction claims promptly and accurately	15 working days or less

THRIVING ECONOMY



Encourage new business investment and sustainable growth across the district

WHAT WE WANT TO ACHIEVE

- Attract new businesses to locate, grow and thrive across the district
- Support the transformation and ongoing vitality of our high streets and regeneration of the city
- Promote the visitor offer that the city, market towns and rural communities across our district can provide

HOW WILL WE ACHIEVE THIS?

- Support opportunities for business growth, regeneration and quality employment through dedicated resources
- Provide inward investment support to businesses looking to move into the district
- Support partners to deliver appropriate infrastructure projects that have regard to the existing character, environment and quality of life in the district
- Develop a cultural partnership that coordinates the cultural offer throughout the district
- Champion the district to benefit from digital infrastructure improvement
- Work in partnership to promote and develop our unique cultural, heritage and natural environmental assets
- Signpost businesses to appropriate and applicable funding streams
- Work with partners to develop 'Visions' for local areas and support initiatives that help deliver those community improvements
- Support the evening and night-time economy offer for all ages
- Engage and support unemployed and under-employed residents to help them into quality employment

SUCCESS MEASURES

		Target
2.1	Progress the Southern Gateway Masterplan in partnership with landowners and developers	March 2028
2.2	Redevelopment of the St James' industrial estate to provide an additional 690 square metres of floor space	March 2022
2.3	Provide support to medium or high growth potential businesses	30 businesses per annum
2.4	Commercial space void levels less than the South East average (on a 3 year rolling basis)	Below South East average
2.5	Support our residents to become economically active through the ChooseWork programme	60 new clients per year

SUPPORTED COMMUNITIES



Support our residents, of all ages and abilities, to live healthy and fulfilled lives

WHAT WE WANT TO ACHIEVE

- Promote active and healthy lifestyles
- Increase physical and cultural activities
- Promote and support events within the district
- Safe and supported communities
- Biodiverse, attractive and well used green spaces

HOW WILL WE ACHIEVE THIS?

- Focus on the most disadvantaged areas, communities and groups
- Identify and support opportunities to improve the health and wellbeing of our residents and enable them to become more physically active.
- Work collaboratively to support a year-round programme of events, festivals and activities for residents and visitors
- Deliver the targets set within the Community Safety business plan
- Use our parks and green space to encourage more active lifestyles
- Work with our health partners to deliver shared priorities
- Enable communities and the voluntary sector to access appropriate funding streams.

SUCCESS MEASURES

		Target
3.1	Working with Everyone Active increase the number of visits to the leisure centres (baseline to be reset in 2022)	By 1% each year
3.2	Work in partnership to maintain Chichester district's comparatively low all-reported crime rate	Less than 10% increase
3.3	Percentage of people maintaining positive lifestyle changes as a result of referral to the Wellbeing service after 3 months	80%
3.4	Enable the hosting of Headline events within the district	At least 1 per year
3.5	Enable the hosting of Feature events within the district	At least 5 per year
3.6	Enable the hosting of Town and City Events and Markets within the district	At least 5 per year
3.7	Establish a cultural partnership and create an action delivery plan for the partnership	September 2023
3.8	Celebrate and support a District wide Season of Culture	December 2022

FINANCIAL PRUDENCE



Manage the Council's finances prudently and effectively

WHAT WE WANT TO ACHIEVE

- Ensure prudent use of the Council's resources
- Provide value for money through efficient and effective service delivery

HOW WILL WE ACHIEVE THIS?

- Ensure the revenue budget and capital programme remain balanced and sustainable over a rolling 5 year period
- Require compensating savings before any new unfunded revenue expenditure is approved, including capital expenditure that has revenue consequences
- Maintain a programme of reviews for our services to ensure they are delivered efficiently and effectively
- Provide services without the use of reserves
- Continue to identify and develop new and appropriate income generating opportunities that are in keeping with the Corporate Plan's Vision
- Maintain an investment strategy that preserves and improves the financial resources available to the Council
- Rigorously manage the Council's risks
- Have sound governance arrangements in place

SUCCESS MEASURES

		Target
4.1	Return the Council to a balanced revenue position within the 5-year model period 2026-27	April 2026
4.2	Manage and successfully deliver the 2021 to 2024 efficiency programme	March 2024
4.3	Conclude the review of governance arrangements	May 2022
4.4	Prepare budgets and spending plans that are balanced and affordable	Annual
4.5	Prepare treasury, investment and capital strategies that comply with regulations and make best use of Council resources	Annual

A CARED-FOR ENVIRONMENT



Protect our environment as we move towards a low-carbon future

WHAT WE WANT TO ACHIEVE

- The natural and built environment is sustainably protected and enhanced
- Waste is reduced, recycled, reused or disposed of responsibly
- Minimise carbon emissions from new housing, existing housing and other development with the support of central government, registered providers and individual householders
- Minimise our own corporate carbon emissions
- Protect and improve the condition of our harbours
- Help the community minimise its carbon footprint and encourage the reduction of district wide carbon emissions
- Promote the expansion and connection of an integrated network of walking and cycling routes
- Protect and enhance quality views and landscapes

HOW WILL WE ACHIEVE THIS?

- Adopt an up to date Local Plan with positive policies that reduce the impact of climate change and promote biodiversity through new development
- Implement our Climate Change Action Plan
- Work with partners to produce a natural capital baseline survey, and review approach to shoreline management policy within the harbours
- Influence and work with partners, businesses and residents to support them in their efforts to be more environmentally sustainable
- Support households to minimise the waste they produce and maximise the range of items that are recycled to deliver low residual waste volumes and high recycling rates
- Encourage infrastructure projects that support walking, cycling and the use of public transport throughout the district
- Make positive environmental changes to how the council manages its own premises, people and services
- Use our parks and green space to restore natural habitats, increase tree cover and increase biodiversity

SUCCESS MEASURES

		Target
5.1	Require new development to achieve high levels of energy efficiency, water efficiency, minimise carbon emissions and increase renewable energy use through policies within the Local Plan Review	Spring 2023
5.2	Ensure appropriate nitrogen mitigation is in place to avoid harm to Chichester harbour and work with partners to restore the harbour and reverse current losses and degradation.	Spring 2022
5.3	Working with partners, deliver a framework within which compensatory or supporting habitats can be provided for Chichester harbour and other sensitive areas	Spring 2023
5.4	Reduce the council's carbon emissions from 2019 to 2025	10% per year
5.5	Support the district in reducing its carbon emissions from 2019 to 2025	10% per year
5.6	Work towards the achievement of a 65% recycling rate by 2030 (domestic and commercial) from the current baseline of 47%	49% by 2024
5.7	Reduce the amount of residual waste per household, per year	1% per year
5.8	Implement a food waste recycling service	2023/24
5.9	With partners, deliver long-term environmental targets set out in the Environment Act	Tbc

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Project Documentation - Initial Project Proposal Document

Project:

Author: Kevin Carter Version:

Draft

1. Purpose of Document

The purpose of this document is to justify the undertaking of the project based on the estimated cost of delivery and the anticipated benefits to be gained. The proposal outlined in this document will be used as part of the process for prioritising future projects.

2. Project Description

CCS have proposed many cost efficiency and revenue generating proposals, this IPPD has grouped several of these under one IPPD to highlight the necessary resource required to deliver these within the current efficiency programme timelines.

In scope:

- Commercial vehicle washing
- Bulky bag service
- Commercial and resident bin washing service
- Development of route optimisation application and development and implementation of changes to enable more efficient routes
- Resident engagement and communication
- Development and implementation of 'push' notification application

Out of scope:

CCS have other savings/ revenue projects as part of the current efficiency saving programme, which are currently in progress and are shown below for completeness.

- Trade waste increase project
- CCS working calendar changes
- Commercial food waste
- Route Optimisation
- Grass cutting change of service
- Charging for holiday and lets implementation

3. Background

CCS have proposed many projects (shown above) to support the authority in achieving its forecast medium term budget deficit.

While each of the project financial targets have been developed to include the design, implementation and operational costs the critical thinking and business acumen to achieve all of these within the same period within CCS is over stretched.

All of the above projects (in and out of scope) are currently being entered in the 2022-23 and 2023-24 budget cycles.

Each project in isolation is still very much viable and achievable.

Each project requires business planning to be undertaken before detailed scoping, specification and planning can follow. This business planning would include developing market appreciation, designing the service, ensuring back office and operational activities are aligned, specifying service advertising requirements, market communications, price modelling and acting as a focal point for the service as it is implemented (this list is not exhaustive).

As more services are stood up it is very evident the current website (designed for traditional local government activities) is not suitable for use in a competitive market in which these new services will be operating in. Work has been progressing in this area but additional focus is required.

Additionally some of the changes require negotiation and consultation with the workforce.

4. Outcomes to be Achieved

Meet efficiency programme targets for the financial years 2022/23 and 2023/24.

5. Timescales

Projects were due to start delivering savings in FY 22/23. This required the business planning work to have been completed in FY 21/22 (at the latest). With the significant success in winning trade waste business accounts, work in these areas are delayed.

Staff consultation is required. In order that consultation can be conducted in a proactive manner this requires time. It is expected initial engagement work will commenced early in 2022 and be completed by end of 2022.

6. Project Costs and Resources

Costs (£)		Source
One-Off	£245k	Project management and support including a Business Lead Officer, additional support for the website and introducing a push-based messaging system, HR Support, route optimisation changes, admin support and PR support.
Revenue	£260k annual revenue savings	Nett surplus once projects implemented
Services to be involved in the project delivery	HR / PR / IT	

7. Benefits vs. Cost

Year	Out	In	Balance	Payback
1 (22/23)	£120,000	-£20,000	£100,000	
2 (23/24)	£105,000	-£265,000	-£60,000	⌘
3	£50,000	-£275,000	-£285,000	
4	£15,000	-£275,000	-£545,000	
5	£15,000	-£275,000	-£805,000	
5 Year Total	£305,000 *	-£1,110,000	-£805,000	

* Please note the expenditure figure includes £245,000 of one-off project costs, plus £15,000 a year from 2023-24 of ongoing costs that will be netted off against the ongoing savings.

8. Identify Risks

- Without support current management team will be over stretched to deliver all projects.
- Website / booking engines / customer engagement points for customers if not developed in line with project roll outs may limited growth.
- All staffing changes subject to appropriate negotiation and consultation.

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Initial Project Proposal Document

Project: Preparation for the 2023 Member Induction

Author: Nick Bennett, Democratic Services Manager, Data Protection Officer and Monitoring Officer

1. Purpose of Document

The purpose of this document is to justify the undertaking of the project based on the estimated cost of delivery and the anticipated benefits to be gained.

The proposal outlined in this document will be used as part of the process for prioritising future projects.

2. Project Description

This project relates to preparations for the new intake of members from the District Council elections in May 2023.

The principal outputs will be:-

- Member Induction programme.
- Member Welcome Pack.

A Members' Task and Finish Group, supported by the Legal and Democratic Services Manager will be set up to inform the project.

It will consider [not necessarily an exhaustive list]:

- The induction and training needs of new members;
- The information needs of new members;
- The mentoring and support needs of new members in more depth than historically – Chairman's group members have offered to take a lead on this;
- IT requirements and data protection issues; including social media
- Legislative requirements.

3. Reasons

- Once the election has taken place, it is very important that members, especially those who have no previous experience, should quickly be equipped to fulfil their legal obligations, roles and responsibilities effectively.
- The consequences of not doing this could, at worst, lead to the Council's decisions and actions being overturned through judicial review.
- Members have a key role in devising, approving, owning and directing the delivery of the Corporate Plan.

4. Outcomes to be Achieved

- Members are informed about what they may be taking on and are able to fulfil their responsibilities in an informed manner with the right equipment.
- Members are quickly developed, informed and supported to enable them to fulfil their roles effectively.

5. Timescales

Expected key dates are:-

Formation of T&F group – May 2022.

T&F group proposals / recommendations concluded Sep 2022.

ICT equipment and training plan to be fully worked up with officers by Dec 2022, including budget implications in time for 2023/24 budget.

Nomination period: 29 March – April 2024 (not yet confirmed)

District Council election: May 2022(anticipated)

The Member Induction programme needs to be devised and printed in time to be sent to candidates in mid April 2023. Its delivery takes place over the period May to December 2023.

The Member Welcome Pack needs to be handed to newly elected members at the count in May 2023.

Overall the project preparation needs to be completed by December 2022 for delivery in May 2023.

6. Project Costs and Resources

	Costs (£)	Source
One-Off	ICT: Supply of equipment, excluding broadband (see note *below) (say £16,000).	
Revenue	Member training (say £12,000) (one-off cost in addition to usual member training budget).	
Savings	None	
Services to be involved in the project delivery	ICT: Advice on IT and data protection. Supply and installation of ICT equipment. Supporting members in using it. Print: Printing materials for recruitment campaign (if any), welcome pack and induction programme. Legal Services (Monitoring Officer): Some advice on legislative, data protection and standards issues. All services: Provision of information for welcome pack and induction programme; participation in delivery of induction programme.	

* Note re Supply of ICT equipment for members: This is difficult to estimate because we have no idea how many new members we will have, nor how many will want CDC equipment. The estimate is based upon previous spend of £14000 after last election and the usual indications from some members that they may not stand again.

7. **Benefits Against Investment**

Post-election induction and support: This is impossible to quantify.

8. **Identify Risks**

Post-election induction and support: Risks include:-

- induction training sessions being poorly presented;
- members failing to attend;
- senior managers failing to give the project sufficient priority;
- resource constraints

10th November 2021

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Chichester District Council

Cabinet

11 January 2022

Chichester District Council Equality Strategy 2022-26

1. Contacts

Report Author:

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Cabinet Member:

Peter Wilding, Cabinet Member for Corporate Services, Finance, Revenues and Benefits
Tel: 01428 707324 E-mail: pwilding@chichester.gov.uk

2. Recommendation

2.1 That the Council be recommended to adopt the Chichester District Council Equality Strategy 2022-26 (including the Council's equality objectives).

3. Background

3.1 The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 place a duty on the Council as a public authority to prepare and publish at least one equality objective every 4 years that we believe will help us meet our duties under the Equality Act. Further detail about the Equality Act 2010 and the duties it places on public authorities is contained within the Draft Strategy.

3.2 The Council's current Equalities Strategy 2017-21 is due for replacement. An updated Strategy has been drafted following research into best practice and review of Strategies in place at other Local Authorities. Current thinking about equalities issues nationally and locally has been considered and included where a relevant update was needed. The Strategy also includes an appendix giving a detailed community profile based on the latest local data and statistics.

4. Outcomes to be achieved

4.1 A new Equality Strategy is adopted and published on our website, in compliance with our duties under the Equality Act 2010.

5. Proposal

5.1 As in previous versions of the Equality Strategy, this new draft contains a set of broad, strategic objectives based around the key themes of: Data, Employment and Staff, Service Delivery, Community Cohesion and Involvement and Equality and the Rural Area.

5.2 Key changes from the Council's previous Equality Strategy are:

- **Digital Inclusion** – Covers the recent work done to improve the accessibility of our online services to allow more people to ‘self-serve’, but makes the point that support is always available for those who need it and that online access and proficiency are not a requirement of accessing our services.
- **Protected Characteristics** - Additional, informal protected characteristics are added (socio-economic and geographic inequality and the needs of carers), committing us to consider them where they are relevant.
- **Data** – Reference to our use of external data sources is strengthened. Services are encouraged to look at what data they already have access to (either published data sets or collected from customers as part of application or enquiry forms) before asking customers for additional information.
- **Service Delivery** – A commitment to ensuring our partners, contractors and suppliers also comply with relevant statutes is now included. The Strategy states that the Council will take account of any emerging equality issues we may need or choose to make commitments on during the life of the Strategy.
- **Community Cohesion and Inclusion** – New, community focussed objective, which addresses explicitly the duty placed on us by the Act to foster good relations. Support for victims of discrimination is included in this objective, along with inclusive engagement.

5.3 If approved, Services will need to incorporate the published equality objectives into their annual Service Planning process and consider how their work can help the Council to meet them. Equality Impact Assessments are still encouraged to document analysis of the likely impact of any policy, procedure, initiatives or projects on those with protected characteristics.

5.4 The Strategy’s objectives will also be used to inform our Annual Report on Equalities, which we are also obliged to publish under the Equality Act, to detail our progress over the preceding year towards achieving our equality objectives.

6. **Alternatives that have been considered**

6.1 The Strategy is due for replacement and publication of Equality Objectives is a requirement, therefore, no alternatives have been explored.

7. **Resource and Legal Implications**

7.1 The Strategy replaces an existing one, so no additional resource is required. Publication of the Strategy is in accordance with our duties under the Equality Act 2010.

8. **Consultation**

8.1 Comments were invited from all Divisional Managers and some identified key Service Managers. In particular, the Draft Strategy has been reviewed by the DM for Legal and Democratic Services and the HR Manager, with feedback received from both and incorporated into the current Draft.

9. Community impact and corporate risks

- 9.1 The Strategy is intended to have a positive impact on the Community. The published objectives outline our commitment to ensuring equality of opportunity for all and, in particular, that anyone who needs to or wishes to is able to engage with Council services.
- 9.2 There is a risk attached to failing to comply with our duties under the Equality Act, which timely publication of an updated Equality Strategy will mitigate.

10. Other implications

	Yes	No
Crime & Disorder:		x
Climate Change and Biodiversity:		x
Human Rights and Equality Impact: The Strategy will have a positive impact on Equality issues, helping the Council to meet our duties under the Equality Act.	x	
Safeguarding and Early Help: The Strategy has positive implications for work in this area since those with protected characteristics could also be vulnerable. The Strategy's objectives aim to ensure all groups are given the support they need to engage with Council services.	x	
General Data Protection Regulations (GDPR): The Strategy itself publishes no personal data. If Services choose to collect Equalities data about their customers, then the collection, use and storage of such data must be GDPR compliant.	x	
Health and Wellbeing: The Strategy sets out what positive actions are being undertaken to improve health and wellbeing, particularly as regards the mental health of Council staff.	x	

11. Appendix

- 11.1 Chichester District Council Equality Strategy 2022-26

12. Background Papers

- 12.1 None

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Chichester District Council

Equality Strategy 2022 - 2026

Date Agreed: Cabinet and Council Jan 2022
Contact: Corporate Improvement

Introduction

Chichester District Council is committed to providing equality of opportunity in all our activities and to ensuring that discrimination does not occur.

This Strategy sets out our Equality Objectives for the period 2022-26, how we plan to achieve them and how we will measure our success.

The Strategy adopts a broad definition of equality, following the Equality Act 2010 in focusing on 'equality of opportunity'. This means that action taken under this Strategy can be tailored to meet the specific needs of the individual or group in question and does not necessarily require everyone to be treated the same.

Scope

This is a council-wide strategy that outlines our equality commitment to staff, members of the public and communities in our District.

Also linked to this Strategy is our Annual Report on Equalities, which gives details of our progress on actions that support our equality objectives. This is written and published annually on our website.

Where relevant, this Strategy will also refer to other internal policies and documents, which are made available to staff via our Intranet.

Legislative Framework

This strategy sets out the measures we are taking to meet the requirements of the Equality Act 2010 and other relevant legislation, including:

- Human Rights Act 1998
- Data Protection Act 1998 and Data Protection Act 2018
- Employment Act 2008
- The Public Sector Bodies (Website and Mobile Applications) (No. 2) Accessibility Regulations 2018

Protected characteristics

The Equality Act covers nine characteristics that people may have, which are called Protected Characteristics. These are shown in the table below, alongside their definition according to the Equality Act, or, where relevant, a more up to date accepted definition.

Protected Characteristic	Meaning
Age	A person of a particular age or age group
Disability	A person who has (or has had) a particular disability. Disability is defined as a physical or mental impairment that has a substantial and long-term negative effect on a person's ability to carry out normal day-to-day activities. Progressive conditions are covered by the Equality Act.
Gender reassignment	A transsexual person. Transsexual is defined as a person proposing to undergo, undergoing or having undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex. A Women and Equalities Committee Report in 2016 recommended that the terms 'gender reassignment' and 'transsexual' used in the Equality Act 2010 are

	outdated and misleading. The preferred umbrella term for those with this protected characteristic is trans. This definition can also include those who identify as non-binary.
Marriage and Civil Partnership	A person who is legally married or in a civil partnership.
Pregnancy and Maternity	A woman who is pregnant or has given birth in the preceding 26 weeks. Includes those who are breastfeeding. Further protections are given in the Act beyond 26 weeks, but this is considered under the sex protected characteristic.
Race	A person of a particular racial group or the racial group as whole. Race includes colour, nationality (including citizenship) and ethnic or national origins.
Religion	A person of a particular religion or belief or lack of religion or belief. Religion includes any religion with a clear structure and belief system. Belief includes any religious or philosophical belief that is worthy of respect in democratic society and does not affect other people's fundamental rights.
Sex	Male or female or a group of people, like men or boys, women or girls.
Sexual Orientation	A person of a particular sexual orientation. This includes sexual orientation towards persons of the same sex, persons of the opposite sex or persons of either sex. Expression of sexual orientation such as through a person's appearance or the places they visit is also covered.

Where they are relevant, the Council will also consider the impact of socio-economic and geographic inequality and the needs of carers alongside the proscribed protected characteristics.

The Public Sector Equality Duty

The Equality Act 2010 places certain duties on public authorities, which includes Councils. Public authorities must, in the exercise of their functions, have **due regard** to the need to:

- Eliminate discrimination, harassment and victimisation and other conduct prohibited by the act
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not

The Equality Act 2010 further explains that having due regard for advancing equality means public authorities should:

- Remove or minimise disadvantages suffered by people due to their protected characteristics
- Take steps to meet the needs of people with protected characteristics, where these are different from the needs of other people
- Encourage people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

Finally, the Equality Act 2010 (Specific Duties) Regulations 2011 places a requirement on public authorities to publish, at least annually, information to demonstrate compliance with the above duties. Public Authorities with 150 employees or more are also obliged to publish, at least annually, information concerning protected characteristics in relation to their staff and other persons affected by its policies and practices.

What are the benefits of the equality duty?

Compliance with the general equality duty is not only a legal obligation, but we believe it will help achieve our aim of the district being an inclusive, safe and fair place to live, work and visit. Compliance with the Public Sector Equality Duty should result in better-informed decision making and policy development. An organisation that is able to provide services to meet the diverse needs of its users should find that it carries out its core business more efficiently. A workforce that has a supportive working environment is more productive and a diverse workforce draws on a broader range of talent and better represents the community we serve.

How We Comply with the Duty

At Chichester District Council we comply with the specific duties by publishing an Annual Report on Equalities every year, which looks back over the previous calendar year. The report identifies progress we have made towards our published Equality Objectives and also includes anonymised information about our staff profile in relation to the protected characteristics.

Equality Impact Assessments are used to assess the impact of any major new or amended policies and practices on those with protected characteristics. They ensure the potential impact of any proposal on those with protected characteristics or on our compliance with the Public Sector Equality Duty have been considered carefully. Completed Impact Assessments can be found on our website, as part of Committee Papers for relevant decisions. Where a full Impact Assessment is not required, our Committee Report template still includes space for a brief assessment of the equality impact of the particular proposal. Training for staff who write committee reports has been provided to give further detail on this requirement.

Our Equality Objectives

The Equality Strategy sets out Equality Objectives that the Council will work towards through the life of the Strategy. The objectives are broad and strategic and intended to influence how all the Council's Services are delivered.

The objectives that follow have been identified following review of a range of evidence sources and consultation with Council staff and Members.

We will also refer to the council's priorities, as identified in the current version of the Corporate Plan. One of our identified priorities is 'Supported Communities'. We aim to ensure that there is a safety net in place for the most vulnerable and those who may be disadvantaged in any way, which may include those with protected characteristics. We will consider the issues faced by these people in relation to our services or policies and ensure they are taken into account in the decision making process.

Objective 1: Data

We will use a range of internal and external data sources and work in partnership with others to find information about our local communities and customers. We will use data to inform the types of services we offer and the most effective methods of delivery. Where gaps in data are identified, we will engage with customers, communities or local representative groups to find the best way to fill them.

Local data helps build an understanding of the communities that make up Chichester district and the needs of those communities, which in turn will help to inform the development of policy and decision-making. The authority undertakes equality monitoring using a vast range of community and ward profiling data produced by our local partners, census data and other national data sets where data is released at a Local Authority level. Service Teams also collect and hold their own information that is relevant to the Service they deliver. **Appendix 1** shows the most up to date equality data available at district level at the time this Strategy was developed. Subsequent updates can be found using the links to external sources on our website.

Services are encouraged to make use of all types of information available when planning how to deliver their Service. Where a Service discovers a gap in their customer profile, they are encouraged to engage directly with their users/customers, or groups who represent them, to find out whether there are specific reasons a particular group is less likely to use the Service.

Objective 2: Employment and Staff

We will use our power as a major employer in the area to ensure that we lead by example in our human resource practices on equality. We will do this by ensuring our policies on recruitment and retention of staff are sound and all our staff are well supported and adequately trained in equality and diversity matters.

The council recognises that our employees are our greatest resource and all our employment and recruitment policies will reflect our commitment to equality and best practice.

We continue to work towards a workforce that reflects the diversity of the local community to fully utilise their skills and abilities. Employees are asked to supply equality information about themselves so we can assess how representative our workforce is of the wider community. We will take positive action where appropriate to encourage underrepresented groups into our workforce, in line with our current Equality and Diversity Policy.

No employees will be discriminated against in the areas of pay or conditions of service, access to training and development or promotion. In compliance with The Equality Act, we publish annually a report on gender pay gap calculations at the Council.

Where the needs of our customers allow, we promote flexible working practices, recognising that many of our employees have caring responsibilities. The Council ensured that structures, equipment and policies were in place to allow the majority of our staff to work mainly from home for most of 2020 due to the Coronavirus pandemic. We will take forward the lessons learned from this and continue to provide staff with the flexibility to manage their work/life balance, provided the needs of our customers are met and quality services, representing good value for money are delivered.

We have introduced several tools to support the mental health of our staff including stress management tools and the Employee Assistance Programme to help employees deal with personal problems that might adversely impact on their work performance, health or wellbeing. Our Wellbeing Team delivers various focused initiatives and information sessions to support staff.

All employees are required to conduct themselves in non-discriminatory ways towards colleagues and the public and to follow the principles of this strategy at all times. If they do not do so, formal disciplinary action may be taken against them.

Equality training is provided for staff to ensure they are made aware of their rights and responsibilities under this strategy. In particular, all managers are trained in equalities matters concerning employment. Equality training is also offered to Members. Equality issues are an integral part of our training and development programmes, regardless of whether we use internal or external trainers.

In addition, tailored equality training to reflect the needs of specific services is encouraged, particularly for services engaging directly with customers or where there is likely to be significant engagement with people who have protected characteristics.

The council makes a strong commitment to training and development for all staff. All staff have equal access to training and development and we will take appropriate positive action for those who are underrepresented in our workforce.

Objective 3: Service Delivery

We will provide services in a way that will not discriminate against any person with protected characteristics or protected groups within the community. We will consider the equality impact of policies, procedures, initiatives and projects and, wherever possible, will take mitigating action if adverse effects are identified.

We will ensure that all services provided by the council are made accessible, where reasonable to all individuals and groups without discrimination.

Where we do not deliver services directly ourselves, we will ensure our partners, contractors and suppliers also comply with the relevant statutes and encourage good equalities practice. The Council's Contract Procedure Rules were updated in 2021 to follow national models for compliance. Additional focus on social outcomes, including Equality Act based social outcomes, has been designed into the procurement system.

During the 2020/21 closure of our offices due to the Coronavirus pandemic, the Council was able to ensure continued access to our services online. This included improvement of our existing online offer and bringing more services online. Customer feedback indicated a largely positive reaction to this shift. Building on this, our Customer Service Centre reopened with a focus on self-service for those customers who are able to, freeing up staff to meet the needs of our most vulnerable customers. Customer Services Officers remain available to support customers over the telephone and in person. This can include resolving enquiries or supporting customers to move towards self-service in the future. Officers are trained and encouraged to use their judgement and discretion to offer appropriate support to those who need most help.

The Communications Team continue to strive to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

The regulations help to make sure that online public services, whether accessed via a computer or on a mobile device, are accessible to all users and that all documents we publish online are inclusive and easily readable for all potential readers.

We will be responsive to the needs of local people and work to remove any identified barriers to communication. Individuals will be consulted about their communication needs and preferences. In compliance with the Accessible Information Standard, where we provide services linked to health or social care, we will identify particular needs of service users, record them, flag them to other staff and/or share them with other organisations as appropriate, as well as doing our best to meet identified needs.

Delivery of our services will also take account of emerging equality issues the Council has made commitments on and any relevant national considerations or duties. Examples of this that have emerged in recent years include the Armed Forces Covenant, which the Council signed in 2014, the Modern Slavery Pledge, which the Council signed in 2020 and made further commitments on in 2021 and the International Holocaust Remembrance Alliance working definition of anti-Semitism, which the Council adopted in 2020. Council Officers will continue to stay up to date with any new equalities discourse and advise Members accordingly.

We will ensure that our buildings are fully accessible and where this is not practical we will provide reasonable alternative methods of access so no one is discriminated against by physical barriers. The Council has made a commitment to recognise hidden disabilities as part of disability equality and to work towards ensuring Council offices are hidden disability friendly and clearly identified as such by way of the Sunflower logo. All aspects of access and equality are considered at the design stage of repair and improvement contracts.

Objective 4: Community Cohesion and Involvement

We will work to encourage cohesion between different communities and individuals, with or without protected characteristics, and support those who may be subject to discrimination. We will engage with residents, communities and others in an inclusive way, encouraging everyone, particularly people with protected characteristics, to have their say.

The council will work in partnership with other local agencies to promote equality and continue to build closer links with those who may be subject to discrimination through engaging with communities and organisations working with those people. We will support victims of discrimination across all our services. This may be through dissemination of information, signposting to other local services and through the application of this Strategy in service design and delivery. Our Communities Team works with local partners to regularly monitor community tensions and incidences of hate crimes, taking joint action where necessary.

We continue to identify and engage with local groups and organisations that represent District residents who share any of the protected characteristics (for example, Chichester Access Group), to inform the work of the Council. We will explore all opportunities to celebrate diversity and support campaigns and events that promote inclusivity and tolerance in our communities.

The Communications Team seeks to engage with equality groups in Chichester about relevant issues, including those groups that are sometimes underrepresented. Views will be sought from the public whenever there is a statutory requirement to consult and also

when their views can contribute to development of policies or services or are necessary to understand the potential impact of a Council decision. We acknowledge that those who have a particular protected characteristic are best placed to assess the impact of any policy or decision on people who share it. Where practical, we will consult our customers and the local community to establish whether our services are accessible to all.

The council will use a variety of means of engaging with the local community, recognising that some engagement methods will be more effective with different groups. Our Communications Team have a range of tools available to support meaningful consultation and engagement with a range of communities and steps will always be taken to ensure those with specific needs who wish to take part are able to do so. We will regularly consult with the relevant trade unions and our employees using a range of consultative structures and engagement methods. The council will keep these means of communication under review to ensure they continue to be effective.

Objective 5: Equality and the Rural Area

We will ensure that the rural nature of our district is promoted and taken into account, whilst continuing to ensure that accessibility of service is a key consideration when designing new services or revising existing procedures.

We recognise and appreciate the beautiful natural environment we have in the District and its importance to our local communities and economy. However, in some areas, some of our communities experience difficulties as a result of the rural environment, including rural isolation, lack of transport and access to services.

We will take into account the rural nature of the District, to ensure that it is protected, but also that accessibility for all communities and those with protected characteristics is considered and enabled as far as possible. This could include focusing specific support on just our most rural locations. We will ensure the interests of our rural communities are understood and taken into account when decisions are made that affect them.

Putting the Strategy into action

Putting the strategy into action is the responsibility of all staff and Members. Both employees and Members must comply with both the spirit and wording of the strategy. This strategy is to be regarded as part of every employee's terms and conditions of employment.

Divisional Managers are responsible for ensuring that their services are delivered without discrimination and all managers are responsible for preventing discrimination and for setting a good example. Members are responsible for agreeing the strategy and the Cabinet Member with responsibility for Corporate Services will review and sign off the Annual Report on Equalities each year.

When Services plan their projects and service delivery for the next year, as part of our annual Service Planning process, we ask them to identify any projects that could impact on equality issues. Progress on these projects is reviewed annually and published in the Annual Report on Equalities.

The council will communicate the Equality Strategy and related policies to all existing staff and people applying for jobs with the council, for example through the information we send out to prospective employees and through the induction of new employees.

Equality and Diversity pages will be maintained on the council's website and our staff Intranet to ensure they continue to contain relevant and up to date publications and reports.

Remedies

Staff who feel they have been discriminated against should refer to the Equality and Diversity Policy and the Bullying and Harassment at Work Policy as well as the Grievance Procedure if appropriate. Employees who fail to comply with the Equality Strategy may be subject to the council's Disciplinary and Contract Termination Procedure.

Complaints from customers will be dealt with through the corporate complaints procedure.

Appendices

Chichester District population equality analysis carried out September 2021.

Further Reading

The following documents are readily available to staff on our Intranet, or can be obtained by emailing chichesterHR@chichester.gov.uk

- Communication and Digital Strategy 2021-26
- Consultation Toolkit
- Equality Act 2010 – Guidance and Equality Impact Assessment template
- Equality and Diversity Policy
- Equality Monitoring Guidance and equality monitoring template
- Flexible Working Policy
- Conduct of Staff Policy
- Domestic Abuse – Workplace Policy
- Stress Management Policy
- Maternity/Paternity/Adoption/Shared Parental Leave Policies

A copy of this Equality Strategy can be made available in alternative formats by calling 01243 785166.

Chichester District population equality analysis September 2021

BACKGROUND

This document outlines some key statistics which help to understand the residents within Chichester District. The most up to date data for each of the characteristics protected by the Equality Act 2010 has been included. In many cases, the most recent data available comes from the Census. The most recent Census was conducted in March 2021, however, initial data from that will not be released until March 2022. That data will be reviewed when it is released and any significant changes addressed at the time.

The key statistics below are from the 2011 Census, unless a more up to date data source is available. On Census Day 2011, the population of Chichester District was 113,794. The Office for National Statistics (ONS) also publishes annual population estimates; most recently estimating the population mid-way through 2020. This data is also shown below where it is relevant.

AGE

Breakdown of age ranges in the district at Census 2011 and subsequent ONS population estimates. The largest groups are highlighted.

Age Range	Census 2011		Population Estimate Mid-2020	
	Number	Percentage	Number	Percentage
0-9 years	11,282	9.91%	12,206	10.05%
10-19 years	12,609	11.08%	12,796	10.53%
20-29 years	11,350	9.97%	11,589	9.54%
30-39 years	11,326	9.95%	11,226	9.24%
40-49 years	15,809	13.89%	13,513	11.12%
50-59 years	14,974	13.16%	17,851	14.69%
60-69 years	16,101	14.15%	16,755	13.79%
70-79 years	11,734	10.31%	15,553	12.80%
80+ years	8,609	7.57%	10,019	8.25%
Total	113,794		121,508	

In general, the estimated proportion of the District's population in age groups under 50 has fallen from 2011 to 2020, while the proportion aged 50 or over has grown.

DISABILITY

Limiting Long Term Illness

2011 Census figures for people in Chichester District living with a limiting, long-term health problem or disability. The largest group is highlighted.

	Number of people	Percentage
Day-to-day activities not limited by any illness, health problem or disability	93,911	82.5%
Day-to-day activities limited a little by any illness, health problem or disability	11,555	10.2%
Day-to-day activities limited a lot by any illness, health problem or disability	8,328	7.3%
Total:	113,794	

Disability Benefit Claimants

The numbers of active claims for disability related benefits are released by the Department for Work and Pensions and can give a more up to date indication of the number of people in Chichester District living with a disability.

The table below shows the main types of benefits people can claim on the basis of having a disability and the number of people claiming them in Chichester District. Some people are eligible to claim more than one of these so the claimant numbers should be viewed independently of each other. Receipt of some of these benefits does not necessarily mean that claimants cannot also work to some extent.

Benefit	Eligibility Overview	Chichester District Claimants	% Population (mid-2020 estimate)
Disability Living Allowance (DLA)	Now discontinued but some claimants (particularly older people) may continue to receive it until their existing claim ends. New claims are allowed for children under 16.	1,913 (Feb 2021)	1.57%
Employment and Support Allowance (ESA)	Working age claimants with a disability or health condition that affects how much they can work	2,089 (Feb 2021)	1.72%
Attendance Allowance	Pension-age claimants with a disability severe enough that they need someone to help look after them.	3,271 (Feb 2021)	2.69%
Personal Independence Payment (PIP)	Claimants with a long term physical or mental health condition or disability.	2,993 (July 2021)	2.46%

GENDER REASSIGNMENT

Data on gender reassignment is not yet available at a Local Authority level. This has been addressed by the inclusion of a voluntary question about gender reassignment in the 2021 Census. Responses will capture whether or not an individual's gender identity is the same as they were assigned at birth.

Until this data is released, estimates about the number of Trans and non-binary people in the UK place the proportion at between 0.3% and 1% UK-wide. This could suggest that between 365 and 1,215 people in Chichester District identify as Trans or non-binary.

MARRIAGE AND CIVIL PARTNERSHIPS

Marital status of the resident population in Chichester District according to Census 2011 data. The largest group is highlighted.

Marital Status	Number of people	Percentage
Single (never married or registered a same-sex civil partnership)	25,801	27.1%
Married	49,642	52.2%
In a registered same-sex civil partnership	175	0.2%
Separated (but still legally married or in a same-sex civil partnership)	2,153	2.3%
Divorced or formerly in a same-sex civil partnership which is now legally dissolved	8,890	9.3%
Widowed or surviving partner from a same-sex civil partnership	8,500	8.9%
Total (aged 16 or over):	95,161	

PREGNANCY & MATERNITY

According to ONS data, there were **964** live births to women living in Chichester District in 2019. This has fallen from 1,051 in 2015.

ONS also calculates and publishes via NOMIS, a General Fertility Rate (GFR) using the total number of live births per 1000 women aged 15 – 44 according to population estimates. The 2019 GFR for Chichester District is **54.6**, down from 58.5 in 2015. The GFR has generally been falling since 2014, which is in line with trends in the rest of West Sussex and the South East, although figures for these areas remain higher than in Chichester District.

RACE

Ethnicity of the resident population in Chichester District according to Census 2011 data. The largest group is highlighted.

Ethnic Group	Number of people	Percentage
White: English / Welsh / Scottish / Northern Irish / British	105,841	93.01%
White: Irish	743	0.65%
White: Gypsy or Irish Traveller	238	0.21%
White: Other White	3,500	3.08%
Mixed / multiple ethnic group: White and Black Caribbean	269	0.24%
Mixed / multiple ethnic group: White and Black African	158	0.14%
Mixed / multiple ethnic group: White and Asian	361	0.32%
Mixed / multiple ethnic group: Other mixed	304	0.27%
Asian / Asian British: Indian	470	0.41%
Asian / Asian British: Pakistani	36	0.03%
Asian / Asian British: Bangladeshi	131	0.12%
Asian / Asian British: Chinese	339	0.30%
Asian / Asian British: Other Asian	641	0.56%
Black / African / Caribbean / Black British: African	319	0.28%
Black / African / Caribbean / Black British: Caribbean	129	0.11%
Black / African / Caribbean / Black British: Other Black	70	0.06%
Arab	102	0.09%
Any other ethnic group	143	0.13%
Total:	113,794	

RELIGION AND BELIEF

Religion of the resident population in Chichester District according to Census 2011 data. The largest group is highlighted.

Religion	Number of people	Percentage
Christian	75,248	66.13%
Buddhist	492	0.43%
Hindu	276	0.24%
Jewish	163	0.14%
Muslim	419	0.37%
Sikh	31	0.03%
Other Religion	516	0.45%
No Religion	27,947	24.56%
Religion Not Stated	8,702	7.65%
Total:	113,794	

SEX

Of the 113,794 people living in Chichester District, 54,401 (47.8%) were male and 59,393 (52.2%) were females at the time of the 2011 Census.

The mid-2020 population estimate shows that the total population of Chichester District has grown to 121,508. 58,411 (48.1%) are male and 63,097 (51.9%) are female. The split of the District's population between males and females has remained generally consistent.

SEXUAL ORIENTATION

Data about sexual orientation is not yet available at a local authority level. This has been addressed by the inclusion of a voluntary question about sexual orientation in the 2021 Census.

Although the 2011 Census shows that 175 people aged over 16 living in Chichester District were in same-sex Civil Partnerships, this does not include those in same-sex relationships who have not formed a civil partnership, or those who identify as gay, lesbian, bisexual or other but are not in relationships.

The latest sexual orientation data at a national level comes from the Annual Population Survey 2019. The table below shows how people nationally identify and how that could translate if calculated based on Chichester District's population. Nationally, the proportion of people identifying as gay, lesbian, bisexual or other has been increasing since 2015.

Sexual Orientation	% Identifying Nationally (Annual Population Survey 2019)	Estimate for Chichester District Population (mid-2020 estimate)
Heterosexual or straight	93.7%	113,853
Gay or lesbian	1.6%	1,944
Bisexual	1.1%	1,337
Other	0.7%	851
Don't know / Refuse	3.0%	3,645

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Chichester District Council

Cabinet

11 January 2022

Planting Trees Outside Woodlands Project - DEFRA funding

1. Contacts

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2. Executive Summary

<p>The Council has entered into a Memorandum of Agreement (MoA) with DEFRA to deliver a tree planting project, fully funded by DEFRA and including a project officer. The project is fixed term and due to run until September 2023. This report seeks approval for the project budget and for the direct expenditure under that budget.</p>
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3. Recommendation

- 3.1 That Cabinet recommend to Council that a budget of £290,240 is approved for the DEFRA funded Trees Outside Woodland Project.**
- 3.2 That, subject to Council approving recommendation 3.1, Cabinet approves expenditure for the project officer and the following two pilot projects:**
 - 3.2.1 £116,450 for the project officer**
 - 3.2.2 £60,040 for the Subsidised Trees pilot**
 - 3.2.3 £28,500 for the Urban Tree pilot.**
- 3.3 That Cabinet delegates authority to the Director of Planning and Environment, following consultation with the Cabinet Member for the Environment and Chichester Contract Services, to accept an increase in the approved budget and expenditure for any of the four pilot projects up to a total of £50,000 per pilot if additional funding is offered by DEFRA or by another participating local authority.**

4. Background

- 4.1 In September 2020, Chichester District Council was invited at short notice to join a DEFRA funded pilot project after one of the existing partners left the partnership. The project is fully funded by DEFRA grant. A Memorandum of Agreement was entered into with DEFRA in December 2020 and the Council are invoicing DEFRA quarterly in arrears for expenditure.**

4.2 The purpose of the project is to trial different approaches to tree planting outside woodlands which have proved to be both difficult and not cost effective. The structure of the project means that DEFRA provides funding for the Council to lead on the Subsidised Tree Pilot, funding for a Project Officer for 2.5 years and also funding to participate in 3 of the 4 other pilots being led by the other partners.

4.3 In December 2021 Cabinet approved expenditure on two of the other pilots (Hedgerow Trees and Agroforestry) that are being delivered through grants to landowners. The Subsidised Tree pilot (on which we lead) and our participation in the Urban Trees project are being delivered by direct expenditure or through CDC procured contractors. The staff costs of the project officer also fall within overall budget. This report seeks approval for the overall project budget through to September 2023 and for the expenditure not already approved.

5. Outcomes to be Achieved

5.1 The main outcome to be achieved is to increase the numbers of trees planted in Chichester District with benefits for biodiversity and climate change mitigation and adaptation.

5.2 By agreeing the recommendations, the Council will be fulfilling its obligations as a partner of the Planting Trees Outside Woodlands Project and as set out in the Memorandum of Agreement between the District Council and DEFRA.

5.3 The main outcome for the whole Planting Trees Outside Woodlands Project is to influence future government policy and to develop new ways of expanding biosecure tree cover outside woodlands at reduced costs to meet increased ambition in England.

6. Proposal

6.1 The project budget and structure have been set through negotiation with DEFRA and the other participating local authorities and is given below. Approval is sought for the budget (£290,239) to September 2023 and for all elements of expenditure (£204,990) apart from those marked as being already approved (those delivered by grants).

	Budget (to Sept 23)	Type of expenditure	Spend to date (Dec 21)	Future expenditure
Staff costs	116,450	Direct	39,979	76,470
Subsidised Trees pilot (CDC expenditure only)	60,040	Procurement of trees, publicity and support costs	14,979	45,062
Urban Tree pilot – (Miyawaki plots)	28,500	By procurement of a contractor	0	28,500
Agroforestry/ Orchards pilot	37,000	By grant to landowners	0	37,000 (approved Dec 2021)

	Budget (to Sept 23)	Type of expenditure	Spend to date (Dec 21)	Future expenditure
Trees in the Farmed Landscape pilot (aka Hedgerow Trees pilot)	48,250	By grant to landowners	0	48,250 (approved Dec 2021)
Total	290,240		54,957	235,282

6.2 All the budgets given above are DEFRA funded under the MoA. As a multiple pilot project, the project officer is essential for pilot design, publicising the scheme, finding larger sites for those pilots that require them, coordination with the wider partnership, administration of grants and procurement and also the large element of post planting monitoring and evaluation required.

6.3 The budgets given above are the minimum budgets. If there are underspends in any other project partners budgets these may be offered to CDC. The recommendation in 3.3 is to give a delegated authority to accept any such increase to the approved budget should this happen.

7. Alternatives Considered

7.1 Withdrawing from the project at this stage is possible but would mean the benefits of increased tree planting are not delivered, future grant funding from DEFRA for environmental projects might not be forthcoming and such an option would not have any financial benefit to the Council.

8. Resource and Legal Implications

8.1 The financial implications are set out in section 6 above. The budgets are fully funded by DEFRA. If CDC underspends in any financial year the budget can be offered to the other local authorities in the project but would be claimed by them in their invoicing of DEFRA.

8.2 The project does not relate to any current statutory obligation, although Government has indicated it is considering the introduction of statutory tree targets as part of the UK's Net Zero Strategy.

8.3 The Tree Project officer has been recruited and is in post under the terms of the existing MoA. The post is managed within the existing resources of the Environmental Strategy team.

8.4 There are no additional IT or property implications.

9. Consultation

9.1 The development of the pilot has been discussed regularly with the external project partners, including DEFRA, Natural England, The Tree Council and the other four local authority partners. The project delivers Action 13.1 (increased tree planting) of the Climate Emergency Action Plan, which was subject to full public consultation.

10. Community Impact and Corporate Risks

10.1 The main community impacts will be increased tree planting and increased partnership working within the district. The council is participating in the project because the project fits well with our Climate Emergency Action Plan and brings additional benefits for the ecology of the District

10.2 One of the main risks for the project is that the sites do not come forward as trial sites for tree planting and the funding is not allocated. However, to date this has not proved to be the case and take-up has been good.

11. Other Implications

	Yes	No
Crime and Disorder		X
Biodiversity and Climate Change Mitigation Yes positive impacts for addressing climate change locally and for biodiversity	X	
Human Rights and Equality Impact Equality issues has been considered by the wider partnership, including ensuring that the funding for trees is accessible to all.	X	
Safeguarding and Early Help		X
General Data Protection Regulations (GDPR) Appropriate handling of data collected is integral to the project. No high risk or significant data handling is required by the project		X
Health and Wellbeing By supporting tree planting there should be minor but positive impacts on health and wellbeing.	X	

12. Appendices

12.1 Quarterly Budget breakdown to September 2023.

13. Background Papers

13.1 DEFRA Memorandum of Agreement 30238 - Shared Outcomes Fund: Promoting Trees Outside Woodland (version dated February 2021)

	2020/21		2021/22				2022/23				2023/24					
Project Heading	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	total	SPEND TO DATE	FUTURE SPEND	
Staff costs	1993.96	9803.61	9607.02	8624.13	9950	10,470	11,000	11,000	11,000	11,000	11,000	11,000	116,449	39,979	76,470	
Subsidised Trees Pilot	420			152.5	14,406	15,062	625	28,125	625	625			60,041	14,979	45,062	
Urban tree pilot - Miyawaki plot						22,500		6,000					28,500	0	28,500	
Agroforestry/ Orchards pilot						17,000			20,000				37,000	0	37,000	authorised
Trees in farmed landscape pilot						36,750		10,000	1,500				48,250	0	48,250	authorised
													290,239	54,957	235,282	

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Chichester District Council

CABINET

11 January 2021

South Downs National Park Authority

Renewal of Development Management Agency Agreement

1. Contacts

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2. Executive Summary

This report outlines the background to the delivery of a Development Management service by the Council on behalf of the South Downs National Park Authority over the previous nine and a half years, which, without any agreed extension of the existing legal agreement or negotiation of a new agreement, will come to an end on 30 September 2022. The report considers the merits of the Council entering into a further agreement for a period of initially 2 years from 1 October 2022 (to 30 September 2024), or to the end date of any agreed Extension of up to 2 additional years (no later than 30 September 2026), subject to approval by the Council and the SDNPA.

3. Recommendation

That Cabinet:

- 3.1 Approve the Council entering into a new Agreement with the South Downs National Park Authority (SDNPA) under section 101 of the Local Government Act 1972 to enable the Council to continue to provide a development management service to the SDNPA for up to two years initially, until 30 September 2024.**
- 3.2 Delegate authority to the Director of Planning and Environment to agree an extension of the Section 101 Agreement for a further two years up until 30 September 2026 if the arrangements are working effectively and agreeable to both authorities.**
- 3.3 Authorise the Director of Planning and Environment to conclude negotiations on the Section 101 Agreement including the Service Level Agreement, related Protocols and proposed basis for payments set out in Appendix 1; and then to complete the Agreement.**

4. Background

- 4.1 For the past 12 years the South Downs National Park Authority (SDNPA) has contracted out much of its development management function to those Local Authorities (known as 'host authorities') affected by the designation of the South Downs National Park (SDNP), through legal agreements under S101 of the Local Government Act 1972. For some of the 15 host authorities the volume of contracted work was not significant and over time ten of the original host authorities have opted out, with the administration of the development management service within those areas transferring back to the SDNPA.
- 4.2 During the first half of 2017 the Council renegotiated the terms of the agreement with the SDNPA, the most substantive of which was the way in which the Council is paid for the work undertaken. Rather than a fixed annual settlement, the Council is now paid by the number of cases it deals with for applications and appeals, and a fixed amount in relation to the provision of enforcement services within the South Downs National Park (SDNP) area. A breakdown of current agreed payments per case is provided as Appendix 1 (inclusive of revised payments now proposed).
- 4.3 The current S101 agreement, under which the Council provides a development management service for the area of the National Park that falls within Chichester District, was entered into on 1 October 2017. The agreement was drafted on the basis of an extended 5-year term, including a 12-month notice period in the event of termination by either the Council or the SDNPA. The agreement sets out the terms under which the Council undertakes all development management planning work pursuant to Parts III, VII, VIII and X of the Town and Country Planning Act 1990, and also the operation of the SDNPA pre-application advice service, within those parts of the SDNP in the Council's administrative area. The work also includes general planning enquiries, the making of tree preservation orders, Environmental Impact Assessment (EIA) screening/scoping and the administration and determination of planning related applications, appeals and enforcement matters. The SDNPA retains the ability to call in those applications, orders or consents which it considers may have a significant effect on the purposes for which the SDNP has been designated.
- 4.4 The above arrangements allow for a greater level of direct involvement by the Council into development proposals within that part of the SDNP which falls within Chichester District than would be afforded if the Development Management Service was provided by the SDNPA itself. This has previously been identified as a valued benefit of the arrangements by the Council. In addition to the added involvement in the SDNP planning process that the arrangement affords, the Council operates the service provided on behalf of the SDNPA to a high standard, which has been recognised by SDNPA officers and is a benefit to the local communities.

- 4.5 The Council and the SDNPA work in partnership in delivering the Development Management Service. In addition to the weekly presence of the SDNPA Link Officer at the Council Offices, Development Management Officers from both CDC and the SDNPA are part of administrative and professional working groups that meet on a monthly basis, in addition to a quarterly 'relationship' meeting at a more senior level. The arrangements put in place in October 2017 continue to work well for both Authorities.
- 4.6 Officers of the SDNPA have advised that they are pleased with the way that the arrangement with the Council has operated throughout the course of the current agreement and are satisfied with the level of service that the Council provides on behalf of the SDNPA.
- 4.7 The Council has also carried out a short time recording exercise following the receipt of the offer by the SDNPA to enter into a further agreement. The results collected so far indicate that, notwithstanding some minor variation in the time taken to determine certain types of application, overall, the time taken to determine planning applications remains comparable to the basis on which the previous (2017) agreement was negotiated.

5. Outcomes to be achieved

- 5.1 To ensure that the proposed agency agreement continues to provide for recovery of all costs incurred by the Council in delivering a development management service for the SDNPA.
- 5.2 Continued arrangements should ensure a high-quality service continues to be provided and that the character and qualities of the area of the South Downs National Park within Chichester District are protected.
- 5.3 There is also considered to be significant benefit for the Council in maintaining a larger core of experienced planning officers and being involved in planning decision making across the whole District.

6. Proposal

- 6.1 The SDNPA has provided a new draft agreement for consideration by the Council, to enable the continuation of the provision of a development management service on behalf of the SDNPA, operated by Chichester District Council.
- 6.2 Much of the proposed agreement remains the same as the existing, with the payment per planning application model retained with (as currently) a fixed cost per quarter for Enforcement work and a fixed cost per planning appeal dealt with.
- 6.3 Following negotiations with the SDNPA, the main proposed revisions to the proposed agreement may be summarised as:

- i. A 2-year initial term, with an option for an extension of a further 2 years, upon the agreement of both parties.
 - ii. An increase in the payments per application (as set out in Appendix 1)
 - iii. An increase in the performance targets for application determination by 10% and validation performance targets by 15%.
- 6.4 Officers are satisfied with the content and format of the proposed arrangements and subject to the successful conclusion of negotiations, it is recommended that the Council enters into a new agency agreement with the SDNPA to provide a development management service on the basis of the negotiated terms of the proposals put forward for the Council's consideration.

7. Alternatives Considered

- 7.1 The case for the Council continuing to provide a development management service on behalf of the SDNPA has been considered carefully by officers. The current arrangements allow for greater involvement by Members in development proposals within the area of the SDNP within Chichester District and, in addition to recouping the direct costs associated with providing the Development Management function on behalf of the SDNPA, allows for a contribution toward the shared cost of some of the indirect overheads of providing a Development Management Service across the whole of Chichester District.
- 7.2 The alternative option, not to enter into a new agency agreement for a further period would mean that the Council would no longer handle planning and associated applications on behalf of the SDNPA. The financial implications to the Council would also need to be reassessed.

8. Resource and Legal Implications

- 8.1 Recognising the importance of this work, the Planning Service operates a dedicated SDNP Applications Team and shares the resources of the Enforcement Team across both the CDC plan area and the SDNP. Both teams are supported by an administrative support team and specialist advisors in areas such as heritage, ecology, housing and environmental health. Given the staff resources already employed in undertaking this work, the continuation of the provision of a development management service on behalf of the SDNPA would not result in significant resource implications beyond those already identified. Maintaining a larger Development Management service to support work both in and out of the SDNP also provides greater resilience to the Council in service delivery as a whole and efficiencies of scale in relation to overheads. It is considered that the increase in payments per application as set out in Appendix 1 is sufficient to allow the Council to recover the increased cost of delivering the service that has arisen through inflation over the last five years and to continue to benefit from the sharing of overhead costs.

8.2 A new agreement broadly on the terms of the existing for a further two years will provide for a continuation of service delivery and staff resourcing whilst allowing for the arrangements to be reviewed at an appropriate point prior to September 2024.

8.3 There are no further legal implications beyond those set out in the body of the report.

9. Consultation

9.1 The proposed Agreement has been the subject of advice from the Council's legal and financial services teams in respect of the proposals for determining future payments and the content of the new S101 agency agreement.

9.2 As the differences between the existing and proposed Agreements are relatively minor with regard to the current system of payment for the services provided by the Council and the expected service level provisions, no further consultation has been identified as necessary.

10. Community Impact and Corporate Risks

10.1 Important considerations are that the extended arrangement continues to deliver a service that is respected by the community, meets the requirements of the SDNPA and ensures the Council is compensated for the agency work undertaken. It is noted that SDNPA have recently expressed their satisfaction with the service that the Council continues to provide on its behalf.

11. Other Implications

11.1 None.

12. Appendices

12.1 Appendix 1 – Agreed costs per case to be used in calculating quarterly payment amounts for both the existing agreement and the proposed agreement [Part II – confidential exempt from publication]

12.2 Appendix 2 - Draft S101 Agreement, Service Level Agreement and Protocols [Part II – confidential exempt from publication]

13. Background Papers

13.1 Current agreement under s 101 of the *Local Government Act 1972*, related Protocols and SLA.

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Chichester District Council

CABINET

11 January 2022

Draft for adoption revised Air Quality Action Plan

1. Contacts

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2. Recommendation

- 2.1. **That Cabinet notes the public consultation responses and approves the revised Air Quality Action Plan for adoption.**
- 2.2. **That Cabinet approves the revocation of the Stockbridge and Orchard Street Air Quality Management Areas and the decommissioning of the Lodsworth air quality monitoring station.**

3. Background

- 3.1. Chichester District Council declared by order four Air Quality Management Areas (AQMA) (in 2006, 2007 and 2020). These AQMAs were declared where air quality fails or was likely to fail an Air Quality Objective for Nitrogen Dioxide (NO₂) prescribed in Regulations. The AQMAs are located in parts of St Pancras, Orchard Street, Stockbridge A27 roundabout and Rumbold's Hill, Midhurst. When an AQMA is declared then adopting an Air Quality Action Plan (AQAP) is a legal requirement. The AQAP must propose actions aimed at driving local air quality towards compliance with the relevant air quality objective of 40µgm⁻³ of NO₂ measured as an annual mean.
- 3.2. The statutory guidance suggests that AQAPs should be renewed every five years. The previous AQAPs have been focused on Chichester as at that time there were only AQMAs declared in Chichester. In January 2020 the Council declared the Rumbolds Hill, Midhurst AQMA and so the revised AQAP now includes Midhurst.
- 3.3. Actions within AQAPs are generally unfunded and adoption of the plan enables bidding for grants to deliver air quality actions. Under the previous AQAPs projects delivered using grant monies include the Co-Wheels car

club in Chichester, doubling the number of bike racks in Chichester City Centre, delivering policy for the integration of electric vehicles in the Council fleet, assisting Parking Services to procure two electric vehicles, delivering staff benefits including the 'cycle to work' scheme, a green lease car scheme for staff and Easit, delivery of a district-wide network of electric vehicle charge points, the Local Cycling and Walking Infrastructure Plan, grant assisting the development of the Selsey Greenway (Selsey to Chichester) cycling and multi-user route, a feasibility study for a cycleway, behavioural change interventions in the community and schools and promotional activities such as for 'Bike to Work' day.

- 3.4. The draft AQAP for adoption contains an analysis of air quality monitoring and air quality modelling data with an emphasis on NO₂. Air quality in the district has steadily improved in the last five years and the modelling predicts that this trend will continue. Air quality in the Stockbridge A27 and Orchard Street AQMAs is now compliant with the national annual mean standard for Nitrogen Dioxide such that it is recommended that these two AQMAs are 'undeclared'. The Council will continue to review the air quality monitoring data for the St Pancras and Rumbold's Hill AQMAs which are predicted to both be compliant with the UK's current Air Quality Standards by 2024. A further report to Cabinet would be forthcoming in the event that the data indicates that these AQMAs should be undeclared.
- 3.5. The AQAP for adoption contains a list of proposed and current air quality actions or projects with indicative timescales.
- 3.6. The Council also monitors ground-level Ozone (O₃) at Lodsworth. The pollutant is not included in the Local Air Quality Management regime and the AQAP proposes that the O₃ monitoring station is decommissioned.
- 3.7. The air quality modelling and trend in the air quality monitoring data suggests that air quality in all Chichester District AQMAs will be compliant with the current UK standards by 2024. Since consulting on the draft AQAP the Environment Act 2021 has been published. The Act proposes a 'binding standard' for small particles known as PM_{2.5}. Nevertheless, the standard will not be adopted until later in 2022. As such once the new PM_{2.5} standard is adopted, where necessary, the AQAP will be amended to reflect any new statutory requirements and the matter brought back to Cabinet at that time.

4. Outcomes to be achieved

- 4.1. The outcomes sought through the AQAP are:
 - To present an evidence base from the air quality monitoring and modelling data for air quality policy in Chichester District,
 - To detail a proportionate policy response to the air quality issues in Chichester District,
 - To deliver actions that seek to improve air quality in Chichester District,
 - The future 'undeclaration' of the Orchard Street and Stockbridge A27 roundabout AQMAs,

- The future decommissioning of the air quality monitoring station at Lodsworth with an annual saving of approximately £2,000,
 - To continue to operate the Orchard Street air quality monitoring station, and
 - To maintain a watching brief for NO₂ at St Pancras and Rumbolds Hill AQMAs.
- 4.2. The decommissioning of the Orchard Street and Lodsworth air quality monitoring stations was an agreed outcome of the Environmental Protection service review. Nevertheless, given the Government's intended publication of refreshed statutory guidance and a new air quality standard it is now considered appropriate to keep the Orchard Street monitoring station running.
- 4.3. This work supports the Corporate Plan priority that CDC will 'manage our built and natural environments to promote and maintain a positive sense of place' and the actions in the Council's Climate Emergency Detailed Action Plan.

5. Proposal

- 5.1. To consider the consultation responses presented at Appendices 2 & 3 and to recommend to Cabinet that the draft for adoption AQAP be adopted.

6. Alternatives considered

- 6.1. None. Where an authority declares an AQMA the adoption of an AQAP is a statutory matter as is the requirement to publicly consult on draft AQAPs.

7. Resource and legal implications

- 7.1. The intended work is within existing budgets in relation to staffing costs. The 'air quality actions' contained in the AQAP are either proposed and subject to funding, or where the projects are current, they are funded. The adoption of the AQAP post-consultation will help support bids for grant monies in the following five-year period.

8. Consultation

- 8.1. Prior to going out for public consultation the AQAP was considered by the Environment Panel on 24 February 2021, Overview and Scrutiny Committee (O&SC) on 9 March 2021 and Cabinet 4 May 2021. Cabinet resolved: That the revised Air Quality Action Plan be approved for public consultation. The subsequent consultation period was from 17 May to 28 June 2021. The results of the consultation and a draft for adoption AQAP were presented to Environment Panel on 20 September 2021 where Environment Panel resolved: 1. That the Environment Panel notes the public consultation responses and recommends to Cabinet the revised Air Quality Action Plan be adopted. 2. That the Environment Panel recommends to Cabinet that the Orchard Street and Lodsworth air quality

monitoring stations are decommissioned after the undeclaration of the Stockbridge and Orchard Street Air Quality Management Areas.

- 8.2. The Council consulted the following (including statutory consultees):
- (i) Internal consultees: Development Management, Planning Policy, Parking Services, CDC Members via Members' Bulletin Board.
 - (ii) External consultees: DEFRA, Chichester City Council, West Sussex County Council (Planning and Transport Policy), the Environment Agency, Sussex-air, South Downs National Park Authority, West Sussex Public Health, Transition Chichester, Chichester and District Cycle Forum.
 - (iii) Public consultation by publishing on the Council's website 'Let's Talk' page and a range of social media platforms (see Appendix for detail).
- 8.3. 219 survey responses were received and there were 161 free-field entries submitted and additional submissions by email.
- 8.4. The majority agreed or strongly agreed with the proposal to continue with a range of actions to improve air quality in the District. The majority agreed with ideas to introduce anti-idling campaigns and ebike and a green carpool for council staff to make work related journeys. Likewise, the majority strongly agreed with actions proposed to tackle particulate matter in the district.
- 8.5. The majority strongly disagreed with the proposal to remove the Stockbridge A27 and Orchard Street AQMAs, however respondents in the free-field section frequently confused the proposed un-declaration of the AQMAs with removal of air quality monitoring, whereas in both locations air quality monitoring will be ongoing. Many respondents also wrote about particulate pollution (PM_{2.5}) which is currently not formally within the Local Air Quality Management regime as an air quality standard. As such the proposal to un-declare the Stockbridge A27 and Orchard Street AQMAs remains in the document.
- 8.6. One response detailed that the Ozone monitoring station at Lodsworth should not, as proposed, be decommissioned for a variety of reasons including given its importance for the Sussex-air daily air pollution prediction service ('Air-alert') and that the pollutant is predicted to increase due to climate change. Nevertheless, Ozone is not included in the LAQM regime and the Air-alert system will be using Met-Office air quality data in the forthcoming period. As such the AQAP continues to recommend that the ozone monitoring station is decommissioned.
- 8.7. Several respondents wrote about fine particulates (PM_{2.5}) and some suggested monitoring this pollutant. The Environment Act commits the Government to adopting a binding PM_{2.5} standard. As such it is proposed to wait until the new standard is adopted and any Government advice or

statutory guidance is forthcoming before determining whether there is a need to monitor this pollutant which currently sits outside of the LAQM as a formal air quality standard.

- 8.8. There were several requests (including by ward councillors) to monitor air pollution at the southern end of St Paul’s Road, Chichester. As such a Nitrogen Dioxide tube site will be added as a new monitoring site.
- 8.9. Some minor changes to the text of the document were made as a result of the consultation. These are highlighted in the draft for adoption attached to this report.
- 8.10. A significant number of responses related to highways or related planning matters and other related policy areas such as parking.

9. Community impact and corporate risks

- 9.1. The adoption of an AQAP has, over the past 12 years, enabled successful grant bids for the delivery of a number of air quality actions (a selection of which are detailed at paragraph 3.3). The impact of the adoption of a revised AQAP will enable continued grant bids to deliver air quality actions as detailed in the AQAP.
- 9.2. The work proposed by the AQAP largely depends on grant funding. As such there remains the risk that relevant grants do not become available or that applications and bids do not result in CDC being awarded monies. Likewise, whilst we seek to deliver initiatives and interventions that offer the best business case, we are nonetheless influenced by what grants are available. The AQAP allows for these possibilities and, whilst it seeks to direct our efforts to where they will have most effect, allows flexibility to accommodate the above issues.

10. Other Implications

	Yes	No
Crime and Disorder		✓
Biodiversity and Climate Change Mitigation Many air quality actions seek to enable walking and cycling and the reduction of use of liquid fuelled vehicles both of which also reduce carbon emissions.	✓	
Human Rights and Equality Impact		✓
Safeguarding and Early Help		✓
General Data Protection Regulations (GDPR)		✓
Health and Wellbeing Many air quality actions seek to enable walking and cycling and the reduction of use of liquid fuelled vehicles. Active travel and reduced air pollution have mental and physical health co-benefits.	✓	

11. Appendices

11.1. 1 Draft revised AQAP for adoption.

11.2. 2 Consultation responses received by direct email.

11.3. 3 Consultation response report.

Chichester District Council

Air Quality Action Plan

2021 - 2026

Prepared by Chichester District Council in fulfilment of Part IV of the Environment Act 1995

Local Air Quality Management

February 2021



Foreword by Councillor Penny Plant, Cabinet Member for Environment and Chichester Contract Services:

Since the 2015 AQAP was adopted by the council air quality has risen steadily up the political agenda. The evidence base for the health impact of this 'invisible killer' has grown hugely over this period. Air pollution has occupied many newspapers' front pages and the public's desire to see action has likewise increased.

The health impacts of air pollution are now known to be systemic in humans. Perhaps unsurprisingly much of what we breathe can pass through our lungs into our bloodstream to be distributed through our bodies. Air pollution is implicated in health effects across the whole span of our lives and the whole function of our bodies with a massive body of statistical and clinical evidence supporting these assertions.

Local community expectations have also grown. In tackling air pollution there are linkages to tackling climate change and, as we move to adopt this plan in a post-Covid era, the 'lockdown' period has undoubtedly caused us to reflect on what we value which includes 'clean air' with the Prime Minister stating that 'clean air will be to the 21st century what clean water was to the 19th.'

There are now strong indications that local air quality has improved and is on an improving trend. The impacts of the post-Covid economy are yet to make themselves known. Nevertheless the good news is that Chichester district's air quality is increasingly compliant with the UK's air quality standards which are designed to protect the most vulnerable in our society.

Notwithstanding the improvements we continue to see air quality as an important public health issue where even air quality that is compliant with standards is known to have health impacts. We have strengthened our partnerships since the 2015 AQAP and will continue to strive to deliver meaningful projects that seek to tackle air pollution.

I hope you will find this action plan a proportionate and suitable response to the challenge of tackling air pollution and an approach that is realistically within the gift of what this authority and its partners can deliver.

P C Plant



**Councillor Penny Plant
Cabinet Member for Environment and Chichester Contract Services**

Chichester District Council

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Report Reference Number	AQAP 2021 – 2026
Date	July 2021

Executive summary

Chichester District Council (CDC) has produced this revised Air Quality Action Plan (AQAP) as part of its duty under the Environment Act 1995 subsequent to the declaration of four Air Quality Management Areas (AQMAs). The AQMAs are declared in relation to air quality in locations failing to meet the UK air quality objective for Nitrogen Dioxide (NO₂). The declaration of an AQMA places a statutory obligation on us to produce an AQAP.

This Plan presents and responds to the evidence gathered from our air quality monitoring and modelling and an analysis of the sources of air pollution contributing to the problem. The data does provide some good news in that Nitrogen Dioxide concentrations have fallen in recent years and our recent computerised modelling suggests that this trend will continue. Two of our four AQMAs could be 'undeclared' (Orchard Street and Stockbridge A27 roundabout) and Rumbolds Hill is currently borderline compliant with the relevant standard. St Pancras, Chichester remains non-compliant.

Nevertheless, despite the positive news, we cannot be complacent as air pollution does impact on health at concentrations below the UK's air quality standards and is the biggest environmental impact on health across the UK. Similarly the emphasis through LAQM has been on Nitrogen Dioxide. During the lifetime of this AQAP the Government will, through commitments made in the Environment Act, adopt a binding standard for PM_{2.5} particulates. This pollutant is a very important from a public health perspective such that this AQAP includes actions targeted at local sources of PM_{2.5}.

Since our 2015 AQAP there have been various events that have made the context for an AQAP significantly different to five years ago. The science that quantifies the health impacts of air pollution continues to become more refined with figures now being available for regional health impacts and air pollution being associated with a wide range of impacts on human health.

This AQAP sets out actions that will positively impact on our local air quality. These actions are both within and beyond the powers of this Council and likewise its finances. As such the actions proposed in this document will rely on effective engagement with our partners both to galvanise effective action and to seek monies to fund related projects. In this context our key partners are West Sussex County Council, Highways England and the local community.

Tackling gaseous transport emissions locally requires a move away from liquid fuelled vehicles. Using the evidence available key transport sectors can be targeted with policies to regulate, support and incentivise the shift. This particularly applies to diesel fuelled vehicles.

Maintaining or reducing pollutant levels and improving health in the context of new housing and employment related development requires evidence-based land-use and transport planning policies and actions.

The Action Plan details the most immediate and developed actions, outlines the actions in development and highlights those wider actions contributing to improved air quality. Where possible it sets out the known timescales, and reporting metrics for those actions. However the document is required to be flexible and be able to respond to funding and policy changes.

Update on progress with the AQAP measures, including the new measures, will be incorporated into the Annual Status Report on air quality in Chichester District; the most recent version is available on the Council website¹.

Responsibilities and Commitment

This AQAP was prepared by CDC’s Environmental Protection Team with the support and agreement of the following:

CDC	Planning Policy
CDC	Development Control
Pan-Sussex	Sussex-air
WSCC	Highways
WSCC	Public Health

This AQAP will be subject to an annual review, appraisal of progress and reporting to CDC’s Environment Panel by the authority’s Annual Status Reports (ASRs), as part of our statutory Local Air Quality Management duties. All ASRs will be published on CDC’s website.

¹ <https://www.chichester.gov.uk/pollutioncontrolairquality>

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1. Introduction

The purpose of the Air Quality Action Plan (AQAP) is to set out the evidence for air pollution in the district so to design and publish proportionate and targeted actions aimed at tackling air pollution. In Chichester district we have declared four Air Quality Management Areas and the evidence and response is separately described in the pages that follow. The document is informed by discussions with our key partners. As the source of local air pollution in Chichester district is traffic then our Highways colleagues at West Sussex County Council (as the local Highway Authority) and Highways England are key partners.

Whilst the Council cannot significantly affect air quality at a macro level, its actions, priorities and leadership can make a difference to local residents and businesses and thereby air quality. It can access funds, lobby for investment and influence others to work towards cost-effective outcomes; use its own land and estate in ways that encourage 'green' and healthier behaviour and signal to the local community the sort of activity that it wants to encourage through investment, leadership and publicity.

This plan will be reviewed every five years.

2. Review and Assessment of air quality

Part IV of the Environment Act 1995 requires local authorities to review and assess air quality on a regular basis. Pollution levels within the local authority area are assessed against air quality standards and objectives² (see Table 1 below) which are prescribed in national legislation for the protection of human health and the environment. The air quality standards are designed to protect those most vulnerable to the effects of air pollution and CDC reports annually to DEFRA in its statutorily required Annual Status Report³.

Table 1: The UK National Air Quality Objectives for the protection of human health:

National Air Quality Objectives ⁴ :				
Objective	Concentration measured as ¹⁰	Date to be achieved by and maintained thereafter	European obligations	Date to be achieved by and maintained thereafter
Nitrogen Dioxide (NO₂)				
200µg.m ⁻³ not to be exceeded more than 18 times a year	1 hour mean	31 December 2005	200µg.m ⁻³ not to be exceeded more than 18 times a year	1 January 20
40µg.m ⁻³	annual mean	31 December 2005	40µg.m ⁻³	1 January 20
Particulates (PM₁₀)				
50µg.m ⁻³ not to be exceeded more than 35 times a year	24 hour mean	31 December 2004	50µg.m ⁻³ not to be exceeded more than 35 times a year	1 January 20
40µg.m ⁻³	annual mean	31 December 2004	40µg.m ⁻³	1 January 20

² https://uk-air.defra.gov.uk/assets/documents/National_air_quality_objectives.pdf

³ <https://www.chichester.gov.uk/pollutioncontrolairquality>

⁴ Objectives for other pollutants are not included here as air quality is compliant with them in Chichester and largely so across the UK.

There is no air quality standard within LAQM for PM_{2.5}, instead the Objective for this pollutant states that (authorities should) ‘work towards reducing emissions/concentrations of fine particulate matter’ (PM_{2.5}).

3. The National context

Since the adoption of CDC’s 2015 AQAP the public profile of air quality has grown very significantly. The metrics for the impact of air quality on human health have become ever more detailed so illuminating a wider understanding of the importance of good air quality. Air quality has become commonplace on the front-page of national newspapers, web-sites and social media feeds. The UK government states that ‘air pollution is the top threat to public health after cancer, heart disease and obesity’⁶ with associated costs to our health of £1.7Bn/year at 2020 rising to £5.3Bn from 2030.’ Poor air quality is estimated to reduce life expectancy by an average of six months in the UK, is associated with lung disease, heart attacks and there is increasing evidence for association with cognitive decline and reduced lung-volume for children brought-up in areas of poor air quality.

The UK government published a Clean Air Strategy (CAS) in 2019 which proposes tackling pollution from a wide range of sources including transport, agriculture, industry, domestic solid-fuel burning and domestic cleaning products. As some of the biggest sources of pollution have been tackled the contribution of some of the smaller sources has become relatively more significant so requiring new action. The opportunity here is to tackle pollution from many sources to make our air healthier to breathe, protect nature and boost the economy.

Across the UK 242 local authorities have one or more AQMA(s). Local government is responsible for many relevant policy areas including health, housing, transport, education, local economics, greenspace and quality of life. The CAS states ‘in summary the current legislative framework has not driven sufficient action at a local level’ and seeks through revised legislation to make the statutory

6

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf

basis for tackling air pollution at a local level more effective. This greater effectiveness is evolving⁷ as this document moves towards adoption.

The UK has a national emission reduction commitment for PM_{2.5}. The Local Air Quality Management (LAQM) Policy Guidance suggests that 'Local Authorities are expected to work towards reducing emissions and concentrations of PM_{2.5} in their area as practicable.' The Guidance is not specific about LA's involvement in this regard only that the LA should work with Public Health to define this role. Nevertheless there is growing national and local interest in this pollutant and so this document seeks to respond to that 'interest' in as far as is practicable. Many actions that seek to reduce NO₂ (the emphasis of this Plan) will also help to reduce particulate matter (PM) emissions too. The Policy guidance does however suggest that the authorities should seek 'to move towards a specific objective in line with the annual average EU⁸ limit value for PM_{2.5} of 25µgm⁻³⁹.

The greater national context as this document is being written might be described as one of uncertainty. The impact of the UK leaving the EU and the impact of Covid on economic activity are yet to be fully understood.

4. The Environment Act

The Environment Act (EA) delivers key aspects of the Clean Air Strategy. As this AQAP was being written the detail of how the EA, as it becomes law (an Act), will impact on Local Air Quality Management (LAQM) was yet to be clear. Nevertheless the EA will, we understand, set a legally binding target for PM_{2.5}, an additional long-term air quality target, which will require Councils and other relevant public bodies to work together to resolve air quality issues and make it easier for LAs to enforce restrictions on smoke emissions from domestic burning¹⁰. The EA also gives the government the power to make vehicle manufacturers recall vehicles if they do not comply with relevant environmental standards. The EA details wider measures which are important both nationally and for Chichester District but that nonetheless won't be within the gift of LAs to deliver or enforce.

5. The Road to Zero

The Road to Zero Strategy outlines how the government will support the transition to zero emission road transport and reduce emissions from conventional vehicles during the transition. The Strategy is supported by funding, offered as grants, for the purchase of EVs and the installation of EV charge points. CDC has already accessed the Plugged in Car Grant (£9K) to procure two Renault Zoe EV's for Parking Services and the On-Street Residential Charge Point grant (£61K) for the eighteen EV charge points installed across the district. Since the publishing of the Strategy it has since brought it's deadline to 2030 when all new cars in the UK will be EV (or zero-emission) only.

⁷ See the Section on the Environment Bill.

⁸ The Guidance is yet to be updated for the removal of EU references.

⁹ See Appendix 5 which suggests that CDC's air quality meets that standard, in the worst case location, by a large margin.

¹⁰ Burning wood and coal in open fires and stoves makes up 38% of the UK's primary emissions of fine particulate matter (PM_{2.5}).

6. Public Health and air quality

Each year PHE publishes a Public Health Outcomes Framework¹¹. Chichester has one of the lowest fraction of mortality (4.5% in 2019) attributable to particulate pollution (PM_{2.5}) of any area in the South East¹². Nevertheless particulates cause statistically measurable harm to human health at any airborne concentration. Whilst the sources of such pollution are significantly related to non-local sources there are still many actions that can be taken at a local level that will assist in reducing airborne concentrations.

7. Land-use planning and air quality

The adopted Local Plan provides the broad policy framework and a long-term strategy to manage development, protect the environment, deliver infrastructure and promote sustainable communities within Chichester District (excluding the area within the South Downs National Park) to 2029. CDC is in the process of revising its Local Plan and the Environmental Protection team and Planning Policy team are working together to ensure 'air quality's' policy presence within the revised Local Plan.

Sussex-air has developed Planning Guidance, 'Air Quality and Emissions Mitigation Guidance (2019)'¹³ Officers are working to associate this document with the emerging Revised Local Plan so as to provide a proportionate place for air quality in planning policy.

The Environmental Protection team is also working towards the implementation of the Chichester City Local Cycling and Walking Infrastructure Plan. Discussions with the policy planners are at an advanced stage and there is the intention to include route details, from the LCWIP, in the Revised Local Plan.

8. Gear Change

In 2020 the DfT published Gear Change 'A bold vision for cycling and walking'. Gear Change comes with a £2Bn budget for cycling and walking over the life of the current parliament. The document celebrates the many co-benefits of walking and cycling with the aim that 'Cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030'.

Working in partnership with WSCC the Council's LCWIP puts CDC in a good position to seek the benefit of the monies that come with Gear Change.

¹¹

<https://fingertips.phe.org.uk/search/particulate#page/0/gid/1/pat/6/par/E12000008/ati/101/are/E07000225/cid/4/page-options/ovw-do-0>

¹² Range 5% Chichester to 6.5% Dartford.

¹³ <https://sussex-air.net/ImprovingAQ/Default.aspx>

9. Strategic alignment

West Sussex Transport Plan review

The existing West Sussex Transport Plan 2011-26 (LTP3) is being reviewed to update WSCC's strategic approach to investment in, and management of, the transport network. The draft Plan is currently in public consultation for adoption in 2022.

The Council and Sussex-air will engage with WSCC to ensure the presence of air quality related policy in that Plan. This will include sustainable transport, walking and cycling and supporting the uptake of EVs.

Chichester Car Park Strategy (2010 to 2020)

CDC's Car Park Strategy is currently under review with the intention of rewriting and updating the document. Covid has significantly impacted on car parking and the work to update the Strategy had been paused for several months during the pandemic. Some initial draft information had been submitted to CDC by the consultant relating to the refresh of the Parking Strategy.

West Sussex Climate Change Strategy (2020 – 2030)¹⁴

West Sussex County Council's Climate Change Strategy lists air quality amongst the benefits sought from tackling climate change through reducing transport by petrol and diesel to reduce Nitrogen Dioxide emissions.

West Sussex Electric Vehicle Strategy (2019 – 2030)¹⁵

WSCC published an ambitious Electric Vehicle Strategy in 2019 with the aims to create a public facing electric vehicle charging network powered by renewable energy.

Sussex-air

Sussex Air is a partnership of all the Local Authorities in Sussex which includes strong links to academic institutions (Brighton University and Imperial College, London).

The purpose of the partnership is to:

- Help Local Authorities to meet their statutory obligations to assess and report on local air quality through knowledge and best-practice sharing.
- Provide information to the public on air quality in their area.
- Collaboratively develop and deliver projects to improve local air quality and to reduce people's exposure to poor air quality.

CDC Climate Change Action Plan

The Climate Change Action Plan (CCAP) was agreed by the Council in January 2021 and is the development of an initial plan that was agreed by Council in January 2020. This initial plan set a target for reducing greenhouse gases across the district of Chichester. The target is 10% reduction year on year until 2025 with year-end 2019 as the start point. While the primary greenhouse gas, carbon dioxide, does not fall under the air quality action plan, steps to reduce carbon dioxide emissions will have the additional benefit of reducing air pollution, particularly those from road

¹⁴ https://www.westsussex.gov.uk/media/14787/climate_change_strategy_2020-2030.pdf

¹⁵ <https://www.westsussex.gov.uk/roads-and-travel/travel-and-public-transport/travelwise-sustainable-transport/electric-vehicles/>

transport. Nitrogen dioxide is both a greenhouse gas and air pollutant that falls under this air quality action plan and is found in exhaust fumes.

The CCAP outlines actions that the Council will take to reduce greenhouse emissions from transport. These actions will focus on behaviour changes rather than infrastructure projects which are largely under the remit of the highways authority, West Sussex County Council, and the Highways Agency. A public information campaign is planned which will promote low or zero carbon modes of transportation. The Council will also seek to provide information on funding opportunities that are available from central Government and useful contacts to other organisations so that they can promote low or zero carbon modes of transportation to their staff. The Council is working on collating and improving its staff incentives to use low or zero carbon modes of transport. This complements its policy of procuring electric vehicles unless there is a strong business case not to and its installation of public electric vehicle charge-points across the district.

10. Delivery under the previous AQAP

We have been working hard since the adoption of the 2015 AQAP seeking monies to deliver meaningful actions to tackle local air pollution. Actions delivered under the auspices of the 2015 – 2020 AQAP are described under the priorities outlined in that document as follows:

Priority 1: Measure, model and report on air quality

Under this priority we have:

- Added a further real-time air quality monitoring station for Nitrogen Dioxide (NO₂) on Westhampnett Road , Chichester,
- delivered air quality modelling to help facilitate an evidence base upon which to build this 2021 AQAP (this work is described in detail at section 12),
- continued to maintain and run four real-time air quality monitoring stations,
- continued to publish real-time air quality monitoring information on the internet at <http://www.sussex-air.net/> and
- continued to meet our annual statutory reporting requirement to DEFRA in a timely manner.

Priority 2: Strengthen partnerships, seek funds, pool resources and exploit synergies

Under this priority we have:

- Bid directly and been partners in an annual bid to DEFRA's annual Air Quality Grant fund,
- twice bid to the West Sussex Business Rates Pool monies for cycling (receiving a total of £131K),
- chaired the pan-Sussex air quality group of local authorities and academics known as Sussex-air,
- been active co-authors of the Sussex-air document 'Air quality and emissions mitigation for Sussex (2020)'¹⁶,
- established stronger partnership working with West Sussex Public Health and

¹⁶ <http://www.sussex-air.net/Reports/SussexAQGuidanceV.12020.pdf>

- attended and worked with the WSCC convened Inter-Authority Air Quality Working Group.

Priority 3: Encourage low emission technology

Under this priority we have:

- installed 18 electric vehicle charging points across Chichester district's car parks (see case study below),
- worked up the business case and introduced a policy for integrating electric vehicles in the CDC fleet,
- catalysed and led, under the above described policy, the procurement of two electric vehicles for Parking Services,
- implemented the Easit scheme at CDC to encourage public transport use,
- implemented a car lease scheme at Chichester District Council which significantly incentivises the uptake of electric cars and
- won monies for the expansion of the Chichester car club.

Priority 4: Encourage and Foster behavioural change/modal shift

Under this priority we have:

- Delivered to adoption a Local Cycling and Walking Infrastructure Plan,
- delivered a small section of bike path at Franklin Place/Jubilee Gardens, Chichester,
- provided grant monies to support the development of the aspirational Selsey to Chichester bike path ('Selsey Greenway'),
- delivered a feasibility study for the conversion of a footway into a dual-use path on Oaklands Way, Chichester and
- carried out promotional activities on Bike to Work Day.

Priority 5: Be innovative, capitalise on opportunities and build on success

Under this priority we have:

- Been awarded £62K of Office for Low Emissions Vehicles grant money for the installation of eighteen electric vehicle charge points,
- been awarded £131K¹⁷ of grant monies from the Business Rates Pools money from WSCC (see case study 3 below) and
- been allocated CDC unspent £13K of S106 monies to enlarge the community car club in Chichester.

Case studies

Case study 1: Making the business case for electric vehicles in the CDC fleet

The Environmental Protection (EP) Team was awarded free DfT consultancy to establish the initial business case in principal for electric vehicles in the CDC fleet under a scheme then known as the Plugged in Fleet Initiative. EP officers then worked with the CDC finance team to build a whole-life costing spreadsheet for the procurement of EVs, this used input data from the Energy Savings Trust, CDC Estates, OLEV, vehicle providers and mileage records from vans in the existing fleet. The spreadsheet evidenced that it would be possible to pay back the excess capital cost of an EV compared to a conventional liquid fuelled vehicle through EVs significantly lower running and

¹⁷ As two separate awards of £70K and £61K.

servicing costs and based on Parking Services mileage records. This enabled Parking Services to procure two Renault Zoe EVs in 2019.

The policy was approved by Cabinet in November 2015 such that the adopted policy is: 'That the Council purchases electric vans and cars instead of conventionally fuelled vehicles unless there are significant business reasons why this is not appropriate.' A supporting pack of information to support the policy has since been added to the CDC intranet and a briefing provided to the Corporate Management Team.

Case study 2: Electric vehicle charge points

EP Officers took a paper to Cabinet in December 2015 which resulted in Cabinet resolving to support a bid to the Office for Low Emission Vehicles (OLEV) for grant to support the installation of eighteen electric vehicle charge points with the support of up to £45K of match funding. A business model was then approved by the Senior Leadership Team to prove that the service could be provided and be revenue neutral to the authority. Two Frameworks for the provision of EVCPs were then assessed and a provider chosen, a specification for the EVCPs was written and a provider invited to tender. The resulting costs were used as the basis for a bid to OLEV who awarded CDC £62K. The install was managed by EP and the eighteen EVCPs are now operational.

Case study 3: Chichester City Local Cycling and Walking Infrastructure Plan

A successful bid to the West Sussex Business Rates Pool led to a grant award of £70K for cycling related projects. Following a Cabinet resolution to spend the monies a tender specification was written and a consultant awarded the contract to produce the Chichester City LCWIP. Two public consultation workshop sessions were held and, working in partnership with WSCC Highways, a draft LCWIP was produced. The draft for consultation document passed through Environment Panel, Development Plan and Infrastructure Panel, Overview and Scrutiny before approval for public consultation. 240 consultation responses were received and the document amended ready to pass back through the committees for approval by Cabinet for adoption in the spring of 2021. The Environmental Protection Team is working with Planning Policy colleagues to maximise the presence of the LCWIP schemes (routes) in the Revised Local Plan and Infrastructure Business Plan to maximise the opportunity for scheme delivery.

11. Chichester District Air Quality Management Areas

Chichester District Council (CDC) has four locations which exceeded the annual air quality standard for nitrogen dioxide (NO₂) and for which four AQMAs are declared. The AQMA locations are as listed below:

Table 2: Chichester District’s AQMA details:

AQMA location (road):	Year declared:	Link to declaration order:
Orchard Street, Chichester (A286)	2007	https://www.chichester.gov.uk/media/7896/Orchard-Street-AQMA-Order/pdf/Orchard_Street_Order.pdf
St Pancras, Chichester (A286)	2007	https://www.chichester.gov.uk/media/7898/St-Pancras-AQMA-Order/pdf/St_Pancras_Order.pdf
Stockbridge A27 roundabout,	2006	https://www.chichester.gov.uk/media/7897/Stockbridge-AQMA-Order/pdf/Stockbridge_Order.pdf

Chichester (A27)		
Rumbold's Hill, Midhurst (A286, A272)	2020	https://www.chichester.gov.uk/media/33350/Rumbolds-Hill-AQMA-Order/pdf/AQMA - Rumbolds Hill - Midhurst-.pdf

Description of Orchard Street, Chichester AQMA

Orchard Street is a residential street which is also part of the A286 trunk-road. The AQMA is only declared for the Eastern length of the street between Orchard Gardens and the junction with Northgate roundabout, the street is broadly flat. The street also has Immanuel Church and Chichester Lancastrian Infants School and Central Church of England Academy school West of the AQMA boundary. The street is partially canyoned and experiences increased traffic volumes at peak hours.

Plan 1¹⁸: Orchard Street AQMA, Chichester:

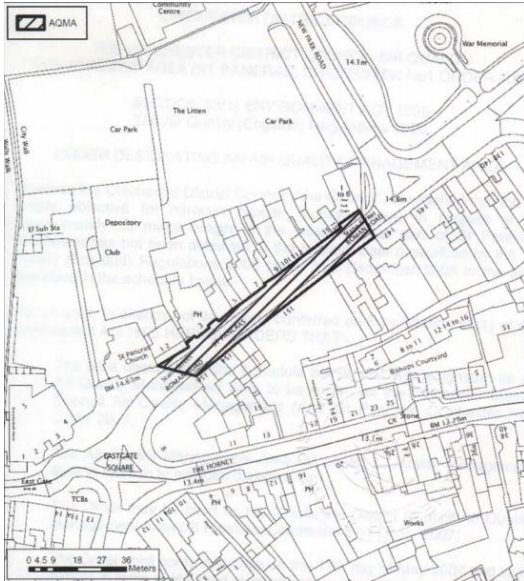


Description of St Pancras, Chichester AQMA

St Pancras is also part of the A286. Only the Western most section of St Pancras, between Eastgate Square and the junction with New Park Road, is declared an AQMA, the street is one-way traffic flowing West to East and is broadly flat. The AQMA contains mixed residential and retail properties where the ratio of the building heights to road width creates a canyoned street feature. Traffic generally flows freely though is subject to acceleration into the AQMA from being stopped at two pedestrian crossings, exiting East Street and traversing the sharp corner between the Hornet and St Pancras.

Plan 2: St Pancras AQMA, Chichester:

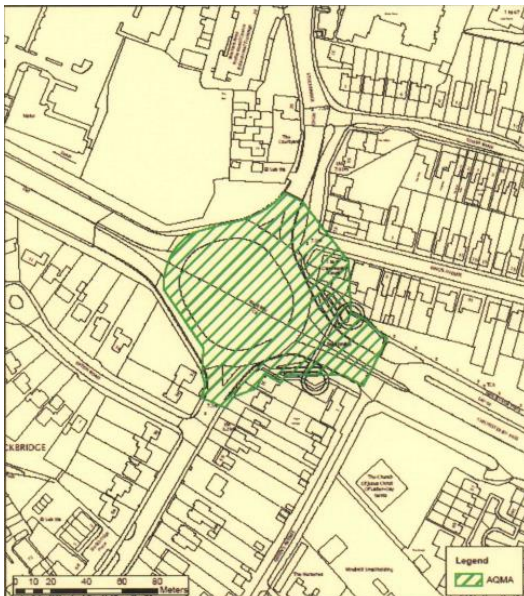
¹⁸ All AQMA plans are taken from the plan on the declaration Order at: <https://www.chichester.gov.uk/pollutioncontrolairquality>



Description of Stockbridge A27 Roundabout AQMA

Stockbridge roundabout is a four-arm roundabout at the junction of the A286 and A27 and where the junctions are on North-West to South-East and North East to South West axes and the topography is broadly flat. The junction features residential receptor locations in close proximity and a high degree of vehicle acceleration and deceleration in-to and out-of the junction. The junction generally does not feature significant queues but at peak hour does feature queuing. The junction is also the dominant route to the peninsula’s sandy beaches and features significant congestion on sunny ‘beach days’ and when Goodwood is hosting large events which give rise to significant volumes of additional traffic.

Plan 3: Stockbridge A27 Roundabout AQMA, Chichester:



Description of Rumbold’s Hill, Midhurst AQMA

Rumbold’s Hill is designated as both the A286 and A272 and the AQMA is declared for the full length of Rumbold’s Hill which runs, at its northern end, between North Street, Midhurst and the Petersfield Road and Bepton Road junction at its southern most extent. The road is on a gentle slope

rising from it's northern end to the south and is narrow such that some vehicles are forced to stop to allow on-coming traffic to pass and such that it is a canyoned in relation to the adjacent residential and commercial buildings. Due to the constraints in the highway width, delivery vehicles stopping on North Street, the need for vehicles to stop to allow passage for on-coming vehicles and traffic lights and junctions close to either end of Rumbold's Hill then there is frequent queuing and stop start traffic.

Plan 4: Rumbold's Hill AQMA, Midhurst:



Relevant exposure locations

The UK's Air Quality Objectives (AQO) only apply to prescribed locations and for the Annual Mean Standard for NO₂ the key location is residential facades. As such table 3 below details the numbers of residential facades within the relevant AQMA boundary.

Table 3: Numbers of residential properties exposed in each AQMA:

AQMA Location:	Number of residential properties exposed:
Stockbridge A27 Roundabout, Chichester	1 in AQMA (comprising 9 flats) (7 properties abutting)
Orchard Street, Chichester	73 properties (inc 2 properties abutting)
St Pancras, Chichester	32 properties (inc 6 flats and 1 property abutting)
Rumbold's Hill, Midhurst	25 properties (including 16 flats) 1 property abutting

12. Summary of Air Quality Monitoring in Chichester District:

Introduction

CDC currently has eighteen air quality monitoring locations using diffusion tubes to monitor Nitrogen Dioxide and four real-time air quality monitoring stations to monitor pollutants as listed in table 4 below:

Table 4: Real-time air quality monitoring stations and the pollutants that they measure

Air quality monitoring station location:	Pollutants measured:
A27 Stockbridge layby ¹⁹ , Chichester	PM ₁₀ , NO ₂
Orchard Street, Chichester	NO ₂
Westhampnett Road, Chichester	NO ₂
Lodsworth, Chichester	O ₃

Note: The whole data-set of real-time air quality monitoring data for CDC and all Sussex air quality monitoring stations is available at: <http://www.sussex-air.net/>

Whilst we are appropriately resourced for air quality monitoring we are unable to monitor 'everywhere'. Over the years we have monitored in many additional locations. In locations where we have found air pollution concentrations to be highly compliant with the Objectives then we have discontinued monitoring there and often redeployed that resource to monitor at other locations of interest.

An annual summary of our air quality monitoring data is reported in the statutorily required Annual Status Report²⁰ (ASR). This report is submitted to DEFRA who audit the report and our progress on delivery of the AQAP. The ASR includes plans of all monitoring locations.

Air quality monitoring is the pre-eminent evidence in considering local air quality in relation to the UK's air quality objectives. It tells us what airborne concentrations of pollutants there have been over defined periods, specific to the monitoring locations. CDC has approximately twenty years' worth of monitoring data and the recent year's reports are available on CDC's webpages. This data is the foundation of making an informed policy response to the local air quality challenges that are expressed through the data-set. It was also the principle evidence for the declaration of the AQMAs.

Monitoring in the same locations across time allows us to see trends in the data-set. These trends are important in considering the weight of 'air quality' as a policy area and how it influences related policy areas such as land-use planning, highways planning and transport.

Air quality monitoring only tells us about the past, what airborne concentrations of pollutants 'have been'. Of course our AQAP is all about influencing the future of air quality. As such we need to augment our understanding of past air quality, garnered from our air quality monitoring data, with an understanding of what we predict air quality to do in the future. As such we commissioned a consultancy to provide CDC with air quality modelling expertise. The outputs of the modelling are

¹⁹ East of Stockbridge A27 roundabout and AQMA on the north of the A27.

²⁰ <https://www.chichester.gov.uk/pollutioncontrolairquality>

discussed at section 12 in this report. Nevertheless the air quality model is calibrated by reference to our monitoring data and so again we see the importance of our monitoring data in shaping our understanding of both the past, present and future of Chichester district’s air pollution.

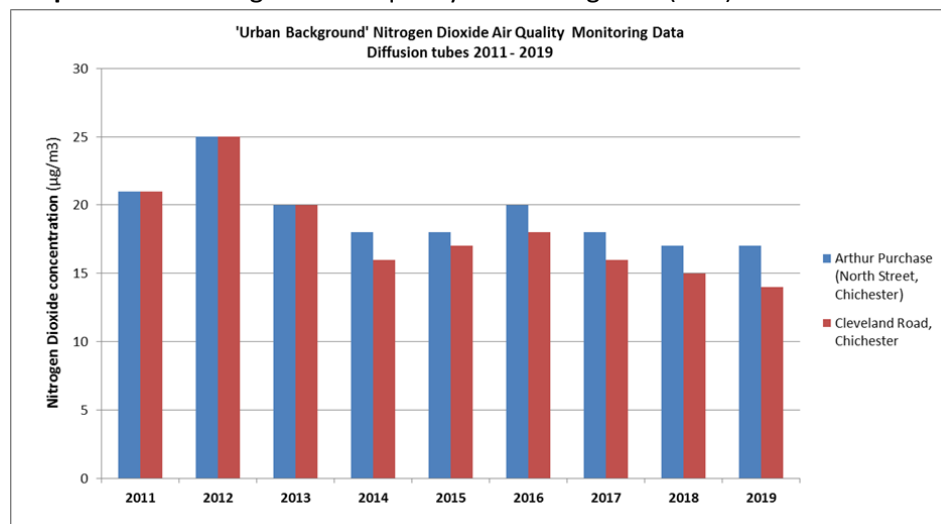
Covid-19 has significantly impacted on economic activity, especially through the mandated lockdown periods. The significantly lower traffic volumes through-out 2020 and into 2021 will impact on air pollution concentrations, nevertheless all of the monitoring data presented in this report is preCovid-19 and therefore unaffected by this consideration.

Air quality monitoring at ‘background sites’

Broadly speaking air pollution consists of two components; local air pollution, from traffic, industry, bonfires, domestic emissions and agriculture etc – and – a ‘background’ component, which is pollution that may come from many hundreds of miles away and which arrives on the advected air mass, or, more simply put, is pollution blown by the wind from distant locations²¹. It is very difficult to measure only the background pollution but it is possible to monitor in locations where the impact of local pollution is minimal²². CDC has two such locations, at North Street, Chichester and Cleveland Road, Chichester where we have long-term diffusion tube monitoring locations. We only have ‘background sites’ for NO₂.

Graph i below shows the last nine years’ worth of data from these two locations.

Graph i: Urban background air quality monitoring sites (NO₂).



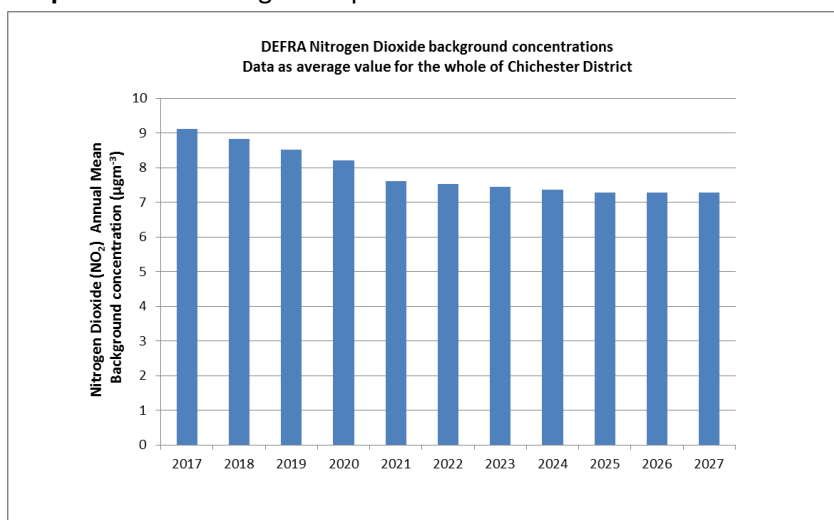
The graph clearly shows a trend of gently, but significantly improving air quality. This is important as it suggests that wider policy measures at a national and international level of government(s) are

²¹ Some pollution changes its chemical and/or physical form during that journey. For instance some gaseous emissions turn into small particles (for example PM_{2.5}), some mixtures of gases react to form new gases (for example Ozone) and some particles join together to form bigger particles or simply drop-out of the air stream through a variety of mechanisms.

²² Note: from a scientific point of view these monitoring locations are not measuring purely background pollution but they are classified as ‘urban background sites’ in accordance with DEFRA guidance for LAQM purposes.

causing improvements in the air quality that is ‘imported’ into Chichester District. Of course there are many variables at play here but a recent and significant variable is likely to be the impact of Covid-19 on economic output. Whilst there is an increasing de-coupling of economic output and environmental impact, it seems likely that the economic slow-down associated with the Covid-19 pandemic has caused a drop in emissions with a commensurate improvement in air quality. As such it seems probable that local background air pollution concentrations will be sustained or be improved. Nevertheless DEFRA’s predictions for background NO₂ concentrations, stated as an average value for Chichester district show a slowing of the improvement in background NO₂ levels compared to 2017 – 2021 (see Graph ii). These values are not adjusted for the impact of Covid-19.

Graph ii: DEFRA background pollution concentrations 2017 - 2027^{23, 24}



Nitrogen Dioxide overall data trend

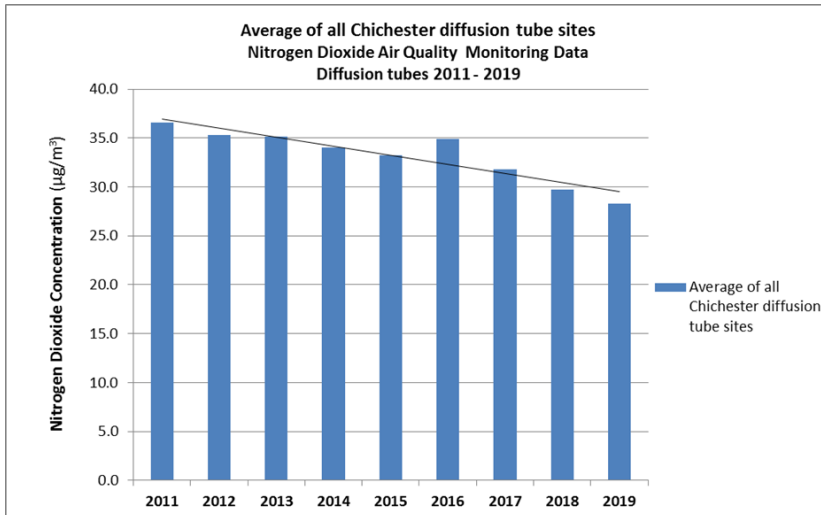
There are many variables that affect air quality monitoring data such that all data is very specific to the location at which it was measured. As such, without detailed scientific analysis of the data, ‘seeing’ trends accurately is fraught with challenges. One way of partially seeing through the ‘noise’ created by these variables is to average all of the available data. Graph iii below illustrates that approach²⁵.

Graph iii: Average of all CDC diffusion tube data 2011 - 2019.

²³ Data from: <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2011>

²⁴ Data range for 2019 6.94 to 15.86µgm⁻³.

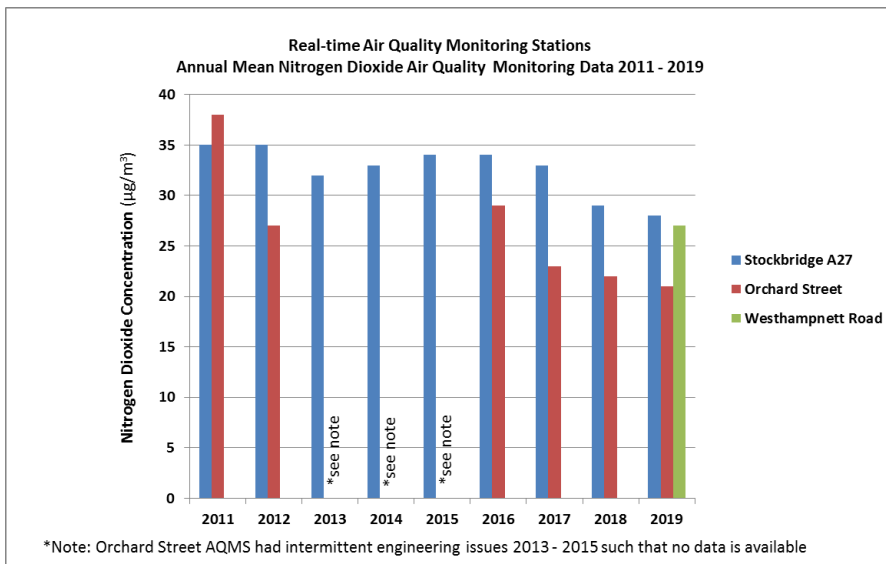
²⁵ Note that the data is only averaged for the monitoring sites that have existed across the whole period (Kings Avenue/Southbank Junction, Claremont Court, A27 air quality monitoring station, Stockbridge Road South, Cleveland Road, Westhampnett Road, The Hornet, St Pancras, Arthur Purchase North Street, St Pancras, Orchard Street) .



Within its limitations Graph iii suggests a clear trend towards improving air quality (for Nitrogen Dioxide) in Chichester district. Transport and, in particular diesel fuelled road vehicles, are the dominant source of NO₂ for our monitoring locations.

This trend is further amplified by the data from the real-time air quality monitoring stations, shown in Graph iv below:

Graph iv: Annual mean Nitrogen Dioxide (NO₂) concentrations for all air quality monitoring stations



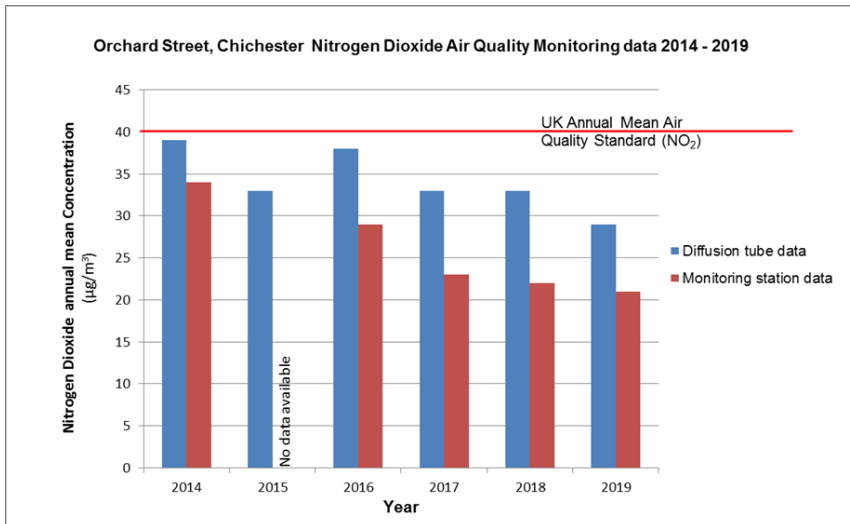
From all air quality monitoring data for NO₂ across the period of the previous AQAP 2015 – 2020 it appears that air quality has improved ie NO₂ concentrations have decreased.

13. Air quality within the AQMAs

Orchard Street AQMA

CDC has two monitoring locations in Orchard Street, one as a diffusion tube and one as a real-time air quality monitoring station. Data from both monitoring locations is presented in Graph v below:

Graph v: All Orchard Street air quality monitoring data 2014 – 2019:



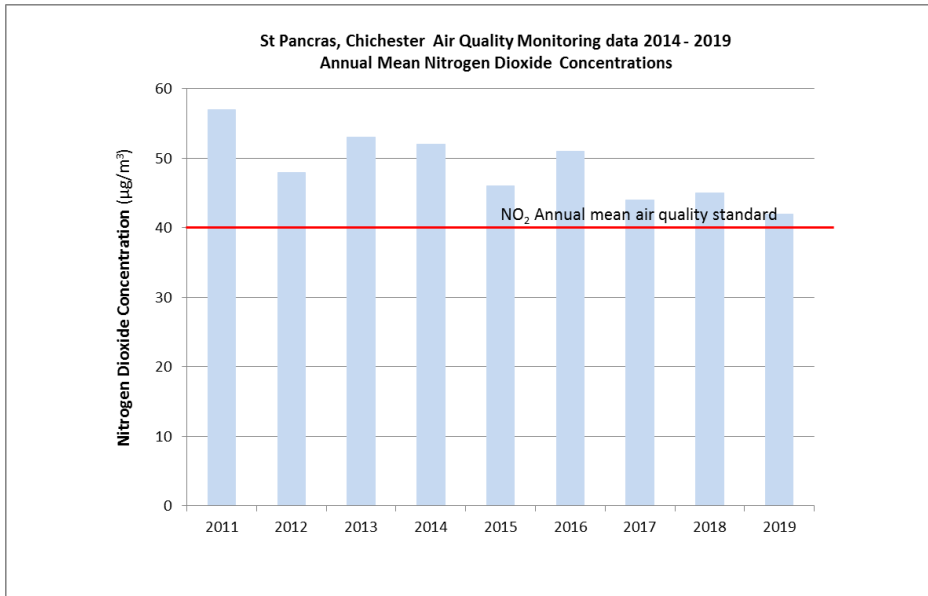
The monitoring data shows clear long-term compliance with significant headroom beneath the standard such that a return to previous concentrations is highly unlikely. As such the monitoring data strongly suggests that the AQMA at Orchard Street is no longer commensurate with the data. On the basis of the monitoring data the AQMA should be 'un-declared'. This is consistent with CDC's ASR 2019 and is further discussed at Section 29 of this report in relation to the air quality model's outputs for future years in this location.

St Pancras AQMA

CDC has two NO₂ monitoring locations in the St Pancras AQMA, one at either end (East and West) and on opposing sides (North and South) of the canyonised section containing the AQMA. Graph vi below shows the monitoring data from this location though the data from only the original monitoring location is shown as the second location is under 12 months old²⁶.

Graph vi: St Pancras air quality monitoring data 2011 – 2019:

²⁶ At the time of writing the 2019 ASR.



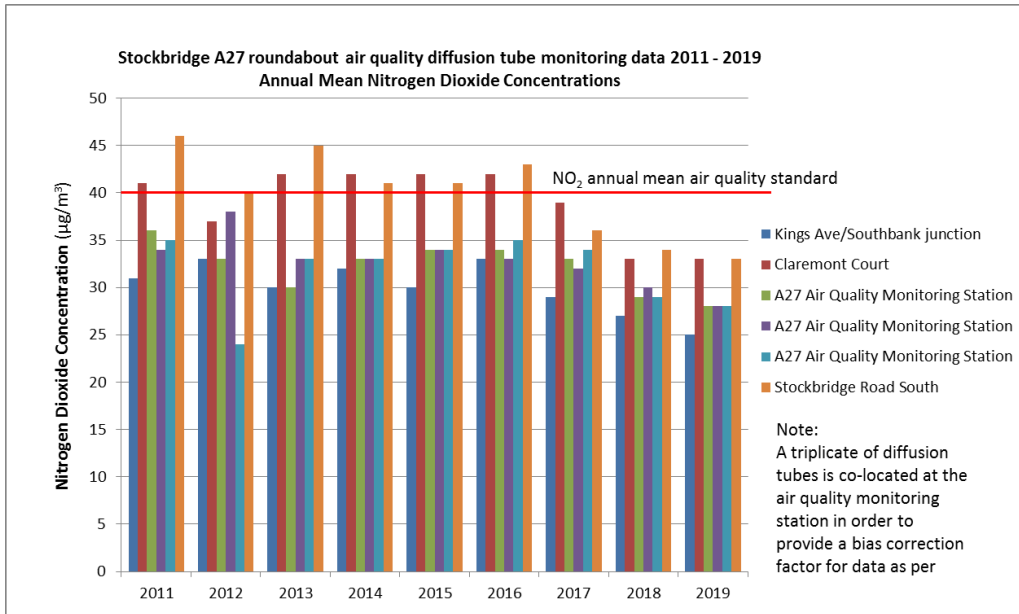
Whilst the monitoring data from St Pancras AQMA shows a trend towards improving air quality it is not yet compliant with the air quality standard. Monitoring will continue in this location in order for us to understand whether the trend of improving air quality ultimately leads to compliance.

Stockbridge

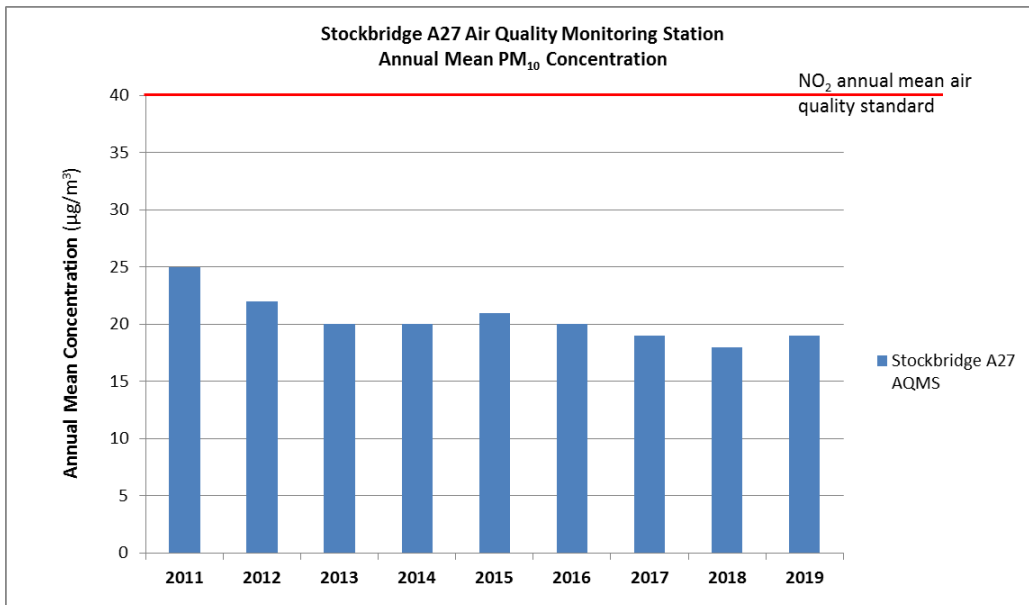
CDC has four monitoring locations in and around the Stockbridge A27 junction. Four as diffusion tubes and one as a real-time air quality monitoring station²⁷. Data from all monitoring locations is presented in Graphs vii to ix below:

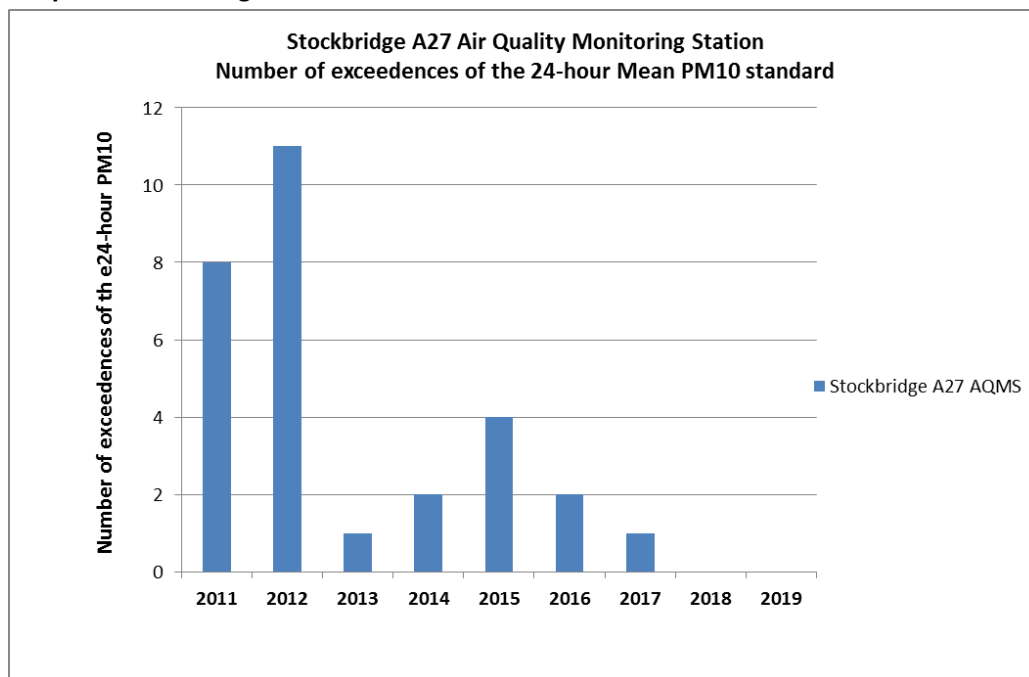
Graph vii: Stockbridge diffusion tube monitoring data 2011 – 2019:

²⁷ where three diffusion tubes are co-located in order to provide a performance check on the data they provide, known as a bias correction factor.



Graph viii: Stockbridge annual mean PM₁₀ concentrations 2011 – 2019:



Graph ix: Stockbridge PM₁₀ exceedences of the 24-hour mean standard 2011 - 2019:

From the monitoring data it is clear that air quality at this location has improved significantly and all Stockbridge monitoring locations have been compliant with the standard since 2017. This commentary is supported by the real-time data for both NO₂ and PM₁₀ which show significant improvements 2011 to 2019.

CDC does not monitor PM_{2.5}. Nevertheless we are aware of the importance of this pollutant in relation to public health and note that the Government's draft Environment Bill commits the UK to adopting an ambient air quality standard for PM_{2.5}. As such the DEFRA guidance provides a methodology for estimating PM_{2.5} from PM₁₀ monitoring data. Applying this methodology gives us an estimated 2019 annual mean concentration of PM_{2.5} at the Stockbridge air quality monitoring station (where we monitor PM₁₀) of 13.2µgm⁻³. This is considered to be a worst-case location for this estimate given the proximity to the A27 with its ~48K annual average daily traffic flow. The calculation for this is presented at Appendix 5. This is comfortably compliant with the annual average EU²⁸ limit value for PM_{2.5} of 25µgm⁻³ as suggested by the Policy Guidance.

Both the monitoring data and modelling data (presented at section 29 below) have been discussed with Highways England (HE) (as the A27 is managed by HE). Officers of both organisations agree that the monitoring data indicates that this AQMA could be un-declared.

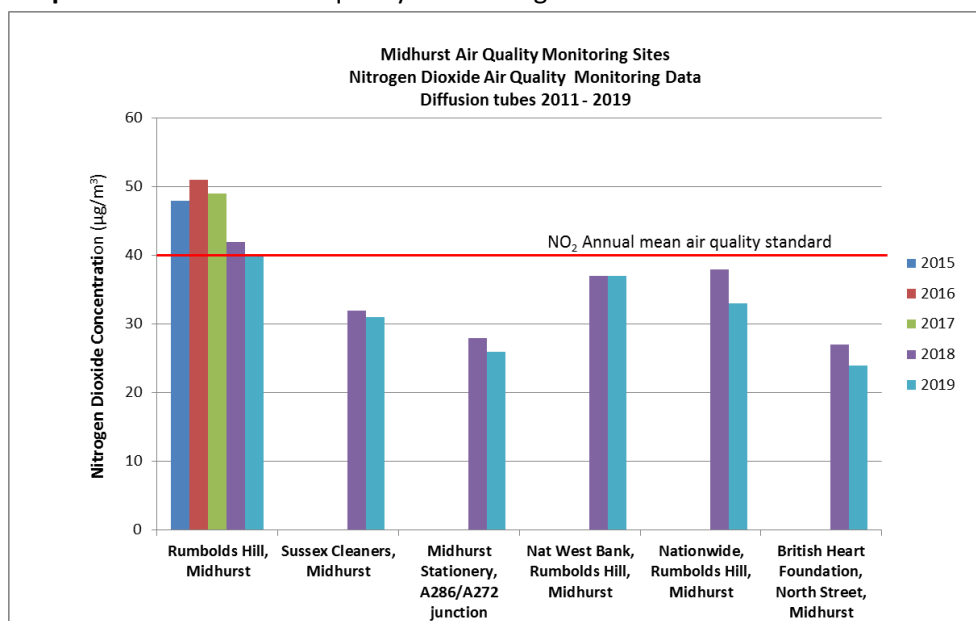
Rumbolds Hill

Rumbolds Hill was declared as an AQMA in January 2020. As such CDC has several monitoring locations there in order to best inform our understanding of air quality there. The two monitoring locations that are both outside of the AQMA (Midhurst Stationery and the British Heart Foundation (BHF)) suggest that the topography of Rumbolds Hill is important in relation to the air quality there.

²⁸ The Guidance is yet to be updated for the removal of EU references.

The BHF monitoring site largely carries an identical volume of traffic and yet because it is outside of the narrow streetscape of Rumbolds Hill its air quality is very significantly better.

Graph x: Rumbolds Hill air quality monitoring data 2015 - 2019



Nevertheless the 2019 air quality data for the long-term diffusion tube site at Rumbolds Hill is borderline compliant with the air quality standard.

Ozone monitoring

The Council monitor ground-level Ozone at Lodsworth in the north of the district as the pollutant mostly affects rural air quality away from other sources of pollution. Ozone is an important pollutant both in relation to public health, its impact on crop-yields and other eco-system effects. Whilst the National Air Quality Objective for Ozone (see table 5 below) is not part of Local Air Quality Management we have monitored it since 2006²⁹. The data at Lodsworth is commonly non-compliant with the Air Quality Objective (see Graph xi below).

There is discussion about this pollutant in relation to the warming climate. As the pollutant is produced by photochemical atmospheric reactions driven by bright sunshine then it is predicted that ground level ozone will worsen due to climate change.

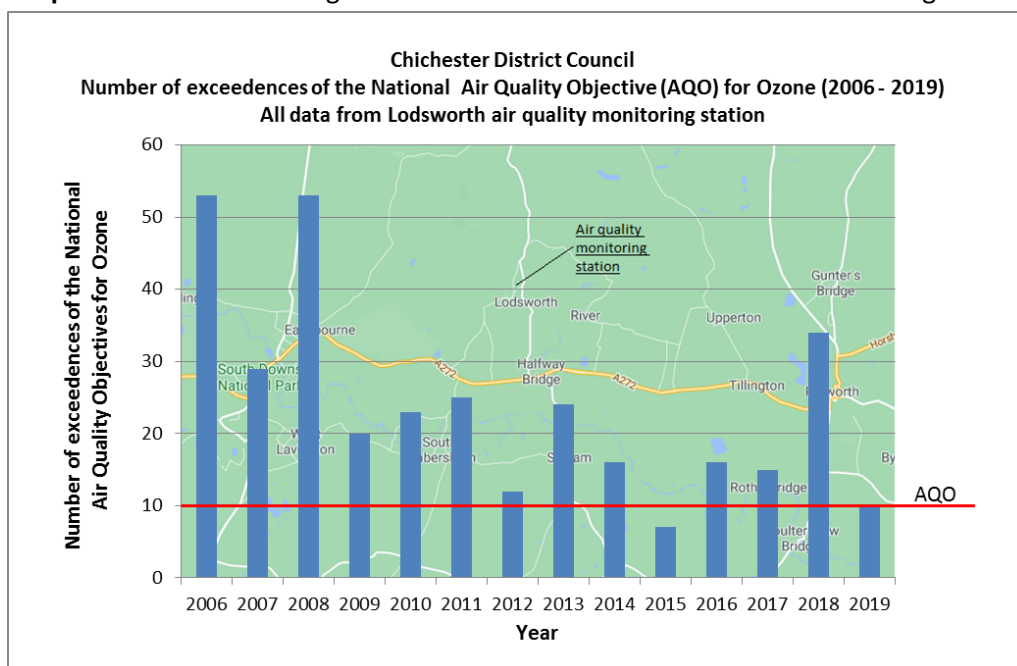
Table 5: National air quality standard for Ozone:

Pollutant:	Objective:	Concentration measured as:	Date to be achieved by:
Ozone	100µgm ⁻³ not to be exceeded more than ten times a year	8 hour mean	31 December 2005

²⁹ The capital cost of installing the station was funded by European grant money as part of a Sussex-air Interreg project.

Nevertheless, given the non-statutory nature of the monitoring it is intended to withdraw from ozone monitoring.

Graph xi: Ozone monitoring data from Lodsworth real-time Ozone monitoring station:



14. Air Quality Modelling Data in Chichester District

1. Introduction

Air quality modelling is an important tool for air quality scientists as it allows us to predict future air quality for specified pollutants and provide us with a spatial picture of air pollution. This compares to air quality monitoring which informs us about the past and (spatially) only for the monitoring point where the data was collected.

Modelling also allows insights into the sources of pollution that make up the overall burden in any modelled location. This is known as ‘source-apportionment’ and allows for policy makers more discrimination into what sources of pollution are most important. This is evidence upon which we can build a targeted response pointed at the worst polluters on a location by location basis. Furthermore modelling allows us to predict the impact of proposed actions to inform our understanding before we commit our resources to any one action.

CDC does not have an in-house capability for air quality modelling and as such commissioned external consultants to deliver the modelling. The full report is at the link here: <<<< link air quality modelling report link here >>>>

Scope and description of the air quality modelling work

Our consultant was instructed to provide modelling data for a range of locations for the years 2018, 2020 and 2025. The locations specified were:

The Locations of the AQMAs ie:

- Orchards Street,
- Stockbridge A27 roundabout, Chichester,
- St Pancras, Chichester and
- Rumbold's Hill, Midhurst.

Additional locations were specified, with the reason for them being specified for modelling provided in brackets, as follows:

- The Hornet, Chichester (the Council's diffusion tube monitoring data indicated a potential for the site to breach the NO₂ annual mean standard),
- Whyke A27 roundabout, Chichester (HE A27 Chichester Bypass Environmental Study Report Appendices (February 2016) detail air quality monitoring that exceeded the NO₂ annual mean air quality standard and air quality modelling submitted with planning application reference 19/01286/FUL predicted an annual mean concentration of NO₂ for 2019 of 39.6µgm⁻³).

Modelling was undertaken using software known as the Advanced Dispersion Modelling Software (ADMS Roads). Other details of the modelling approach include:

- The pollutants modelled were; NO₂, PM₁₀ and PM_{2.5} all as annual mean concentrations,
- for the base year 2018 and future years 2020 and 2025,
- predictions for specified property facades in and around the locations specified above,
- using the most relevant meteorological data-set (for Charlwood, 2018),
- using CDC air quality monitoring data,
- using DEFRA background air quality data,
- using WSCC, DfT and HE traffic data and future year growth factors agreed with WSCC,
- using the DEFRA Emissions Factors Toolkit,
- traffic data included 11 categories of vehicles (including bus fleet data supplied by WSCC) and
- the ADMS model was set-up to reflect the urban topography and acceleration and braking of vehicles at junctions.

As per best practice specified in the DEFRA guidance (TG(16)) the model was run for each location and then verified for the baseline year of 2018. This is done by comparing the model's output predictions for 2018 to the relevant monitoring location's data. An adjustment factor is then derived which is applied to the model on a location specific basis. The verified model was then run to make predictions as presented below.

Because the traffic data input into the model was broken down into 11 vehicle classes then the ADMS model also provides separate predictions for each class of vehicle. This is known as 'source apportionment' and allows for an understanding of the relative contribution of pollution from each vehicle class.

Baseline model results

The model output data for a 'do nothing' scenario is as presented in Table 6 below:

Table 6: Baseline model output NO₂ Chichester locations:

Chichester							
NO ₂ concentration - annual mean (µgm ⁻³)							
Receptor location:	2018	2020	2021	2022	2023	2024	2025
1	34.5	31.5	29.4	27.9	26.4	25.1	23.8
2	<u>39.9</u>	<u>36.4</u>	33.8	31.9	30.1	28.5	27.0
(3,4,5)	31.8	29.1	27.2	25.8	24.5	23.3	22.1
6	34.6	31.5	29.5	27.9	26.4	25.1	23.8
8	32.3	30.4	29.0	27.9	26.8	25.8	24.5
9	41.5	<u>39.0</u>	<u>37.2</u>	35.8	34.4	33.1	31.3
10	50.2	47.0	44.7	42.6	40.7	<u>38.8</u>	<u>36.6</u>
12	<u>36.6</u>	34.4	32.8	31.6	30.3	29.2	27.6
CI1	31.8	29.1	27.2	25.8	24.5	23.3	22.1
CI4	24.7	23.4	22.5	21.8	21.1	20.5	19.7
15	40.0	<u>37.6</u>	35.9	34.6	33.3	32.0	30.3
W1	43.5	<u>39.5</u>	<u>36.8</u>	34.8	32.9	31.2	29.5
W2	31.3	28.6	26.8	25.5	24.3	23.1	22.0
O1	30.7	28.4	26.8	25.7	24.7	23.7	22.7
O2	42.4	<u>39.0</u>	<u>36.6</u>	35.0	33.4	31.9	30.3

Note: Exceedances of the Air Quality Standard are shown in bold and those within 10% (>36µgm⁻³) are underlined).

Table 7: Baseline model output NO₂ Midhurst locations:

Midhurst							
NO ₂ concentration - annual mean (µgm ⁻³)							
Receptor location:	2018	2020	2021	2022	2023	2024	2025
14	39.9	36.9	35.4	33.8	32.6	31.8	29.1
18	36.2	33.6	32.2	30.8	29.6	28.9	26.6
19	37.7	34.9	33.4	32.0	30.9	30.1	27.6
20	34.7	32.2	30.9	29.6	28.5	27.8	25.6
21	32.6	30.3	29.1	27.9	26.9	26.3	24.2

Note: Exceedances of the Air Quality Standard are shown in bold and those within 10% (>36µgm⁻³) are underlined).

The receptor locations in Tables 8 and 9 above are defined as below:

Table 8: Chichester Receptor location descriptions:

Chichester receptor locations:				
Receptor ID	NGR X	NGR Y	Location description:	
1	485773.91	103960.26	Kings Ave/ Southbank Junction	Stockbridge Roundabout AQMA

2	485771.47	103847.47	Claremont Court	Stockbridge Roundabout AQMA
(3,4,5)	485880.84	103791.63	AQMS on Chichester Bypass (A27) and Stockbridge Roundabout	Stockbridge Roundabout AQMA
6	485695.78	103730.9	Stockbridge Rd South (A286)	Stockbridge Roundabout AQMA
8	487340.41	105474.71	Westhampnett Rd	-
9	486502.25	104793.87	The Hornet	(South of) St Pancras AQMA
10	486532.97	104860.06	St Pancras	St Pancras AQMA
12	485913.44	105186.34	174 Orchard St	Orchard St AQMA
CI1	485880.84	103791.63	Stockbridge, near to the Chichester Bypass and Stockbridge R'about	Stockbridge Roundabout AQMA
CI4	485981.41	105222.45	Orchard St	Orchard St AQMA
15	486575.92	104799.25	32 The Hornet	(South of) St Pancras AQMA
W1	486916.28	103709.01	Nursing Home, Whyke Rd (B2135)	NE of Whyke/A27 roundabout
W2	486843.81	103719.1	22/23 Whyke Close	NW of Whyke/A27 roundabout
O1	487745.06	105015.62	Church Rd property	NW of Oving Rd/A27 intersection
O2	487803.03	104975.94	187/188 Oving Rd property	SE of Oving Rd/A27 intersection

Table 9: Midhurst receptor locations:

Midhurst receptor locations			
Receptor ID	NGR X	NGR Y	Location description:
14	488559.88	121478.29	Rumbold's Hill
18	488544.69	121434.01	Rumbold's Hill (Stationary Shop)
19	488583.53	121511.69	Rumbold's Hill (Natwest)
20	488601.94	121538.76	Rumbold's Hill (Nationwide)
21	488629.56	121614.62	North Street (BHF)

The model outputs for PM₁₀ and PM_{2.5} are not presented here as the modelling output data predicted no exceedance of the short-term or annual-mean standards³¹ though the data is available in the air quality model reports³².

Baseline model outputs discussion

The model predicts improving air quality year-on-year to the final years modelled (2025). Full compliance with the UK Air Quality Standards is predicted by 2024 with St Pancras being the last site to comply. The model outputs are all verified against diffusion tube data for 2018, an adjustment factor is then applied to the model such that it accords well with monitored pollution concentrations in the baseline year (2018). The adjusted model performs well i.e. it predicts pollution concentration values close to monitored concentrations. Nevertheless the model verification set-up is such that it predicts for a height of 3m which is the same height as the diffusion tubes' exposure locations. When the model is run for pollution concentrations for LAQM purposes the pollution concentrations are modelled at a height of 1.5m ie in the breathing zone. Whilst this has not generally caused any anomalies it has caused some model performance issues for St Pancras. Further discussion of this point is as below.

Orchard Street, Chichester AQMA

Orchard Street (Receptor location 12) is predicted to continue to have improved air quality and increased compliance with the air quality standard. The modelled data confirms the conclusion that the AQMA is no longer commensurate with the measured and modelled data. As such the AQMA could be undeclared.

St Pancras, Chichester AQMA

St Pancras (receptor location 10) is predicted to continue to have improving air quality leading to marginal compliance with the Air Quality Standard in 2024. Nevertheless the modelling does not compare to the monitoring data for this site; the modelled prediction for 2018 is 50.2µgm⁻³ whereas the diffusion tube result for 2018 is 45 µgm⁻³, similarly the modelled result for 2019 is 47µgm⁻³ against the measurement of 42 µgm⁻³. This apparent discrepancy, not observed to the same degree for other modelled locations, is explained by artefacts in the modelling software. In fact the model verification shows that the model performs well for St Pancras. The apparent discrepancy arises from the model verification being run for a height of 3m, which is the height of the diffusion tube exposure location, whereas the actual model run is for a height of 1.5m, ie the breathing zone. Nevertheless the modelled data's discrepancy with the monitoring data at 1.5m is large and as such this needs to be borne in mind when designing a proportionate policy response. As such a watching brief is recommended to see how air quality in St Pancras changes in the period of this Plan, though it appears that the modelling here is significantly more pessimistic than the monitoring suggests.

Stockbridge, Chichester AQMA

³¹ The model out-puts for particulates (PM₁₀ and PM_{2.5}) are included in the full modelling report appendices.

³² See Appendix D Table D.2.

Stockbridge AQMA (receptor locations 1 to 6) is predicted to continue to have improved air quality and significantly increased compliance with the AQS in 2025. This confirms the monitoring data and suggests that the AQMA could be undeclared.

Rumbolds Hill, Midhurst AQMA

Rumbolds Hill (receptor locations 14 – 20) is predicted to move from marginal compliance to full compliance at 2025. Again should this modelled trend be borne out in monitoring data then the AQMA could be undeclared.

The Hornet

The Hornet (receptor location 9 & 15) is predicted to continue to have improved air quality and move further from being a candidate AQMA with little apparent risk of being declared as an AQMA.

Whyke A27 roundabout

Whyke nursing home (receptor location W1)) is predicted to continue to have improved air quality and move from being a candidate AQMA to compliance with the air quality standard for NO₂.

Oving Road A27 cross-roads

Oving Road (receptor location O2) is predicted to continue to have improved air quality and move further from being a candidate AQMA.

Source apportionment results

Following analysis of the output data from the baseline model source-apportionment (as described in the 'scope and description' section above) was carried out for the locations of most concern as modelling indicated their potential to continue to be non-compliant with the NO₂ annual mean standard.

Source apportionment was refined for buses as WSCC supplied detail of the operator Stagecoach's fleet (vehicle type, age and route). No data was available for hackney cabs or licensed private hire vehicles and so their impact on local air quality was not able to be modelled.

Output for source apportionment is for total 'NOx' for each location ie not for 'NO₂'. This best represents how vehicles emit this pollution. The sub-species of NOx are then oxidised in the environment to become NO₂. The baseline model outputs include source apportionment pie charts for the years 2018, 2020 and 2025. As such readers wishing to see the pie-charts should follow the link from this report to the baseline modelling report, though in any case the summary tables are included in the section that follows.

Note: None of the source apportionment includes background NOx but instead focus is on the local vehicular emission sources. Source apportionment is not carried out for Orchard Street AQMA as the location is now highly compliant with the AQS.

No exceedances of the particulate (PM₁₀ and PM_{2.5}) AQS were identified at any of the modelled locations in 2018, 2020 and 2025 and so the data is not presented or discussed in detail in the AQAP but is available in the modelling reports.

Table 10: St Pancras AQMA source apportionment:

Vehicle type:	NOx source apportionment		
	2018	2020	2025
Petrol Cars (%)	7.4%	7.3%	9.5%
Diesel Cars (%)	50.5%	51.4%	50.3%
Taxis (%)	-	-	-
Petrol LGVs (%)	0.1%	0.0%	0.0%
Diesel LGVs (%)	26.6%	25.9%	22.6%
Rigid HGVs (%)	2.7%	2.0%	1.2%
Artic HGVs (%)	0.8%	0.5%	0.3%
Buses/Coaches (%)	11.6%	12.0%	13.9%
Motorcycles (%)	-	-	-
Full Hybrid Petrol Cars (%)	0.1%	0.2%	0.5%
Plug-In Hybrid Petrol Cars (%)	0.0%	0.0%	0.1%
Full Hybrid Diesel Cars (%)	0.2%	0.5%	1.4%
Battery EV Cars (%)	-	-	-

Table 11: Stockbridge A27 roundabout source apportionment

Vehicle type:	NOx source apportionment		
	2018	2020	2025
Petrol Cars (%)	5.3%	5.6%	8.0%
Diesel Cars (%)	36.2%	39.1%	42.1%
Taxis (%)	-	-	-
Petrol LGVs (%)	0.1%	0.1%	0.1%
Diesel LGVs (%)	35.9%	37.1%	35.5%
Rigid HGVs (%)	16.1%	12.8%	8.1%
Artic HGVs (%)	4.5%	3.0%	2.3%
Buses/Coaches (%)	1.6%	1.7%	2.2%
Motorcycles (%)	-	-	-
Full Hybrid Petrol Cars (%)	0.1%	0.2%	0.4%
Plug-In Hybrid Petrol Cars (%)	0.0%	0.0%	0.1%
Full Hybrid Diesel Cars (%)	0.2%	0.4%	1.2%
Battery EV Cars (%)	-	-	-

Table 12: Rumbold's Hill AQMA, source apportionment

Vehicle type:	NOx source apportionment		
	2018	2020	2025
Petrol Cars (%)	3.3%	3.3%	4.4%
Diesel Cars (%)	30.6%	31.8%	31.6%
Taxis (%)	-	-	-
Petrol LGVs (%)	0.0%	0.0%	0.0%
Diesel LGVs (%)	20.8%	20.7%	18.6%
Rigid HGVs (%)	7.0%	5.4%	3.3%
Artic HGVs (%)	5.5%	3.8%	2.8%
Buses/Coaches (%)	32.1%	34.1%	37.8%

Motorcycles (%)	0.2%	0.2%	0.2%
Full Hybrid Petrol Cars (%)	0.1%	0.1%	0.2%
Plug-In Hybrid Petrol Cars (%)	0.0%	0.0%	0.0%
Full Hybrid Diesel Cars (%)	0.1%	0.3%	0.9%
Battery EV Cars (%)	-	-	-

Source-apportionment conclusions

St Pancras, Chichester AQMA

NOx emissions from the diesel car and diesel LGV sector dominate the St Pancras AQMA location with the ratio of NOx emissions at approx. 77% in 2018 but reducing to 73% toward 2025. Bus and coach emissions are lower but significant over the period, increasing slightly from 11.6% to 14%. The ratio of HGV emissions is relatively small with a decline over this period from approx. 3.5% to 1.5%.

Stockbridge A27 roundabout, Chichester AQMA

NOx emissions from the diesel car and diesel LGV sector dominate the Stockbridge AQMA /A27 location with the ratio of NOx emissions between approx. 72% to 77.5% over the period between 2018 and 2025. HGV emissions are significant at 20.5% in 2018, however reduce to approx. 10.5% by 2025. Bus and coach emissions are small in comparison at 1.6% in 2018 and increasing to 2.2% by 2025. There is an increase in Hybrid Diesel vehicle emissions as a contribution over the period 2018 – 2025 with emissions rising from 0.2% to 1.2% by 2025.

Rumbolds Hill, Midhurst AQMA

NOx emissions from the Bus, diesel car and diesel LGV sectors dominate the Midhurst location with the ratio of NOx emissions at approx. 85% over the period between 2018 and 2025. HGV emissions decline as a proportion of the total NOx emissions over this period with a reduction from approx. 12.5% to 6%.

Scenario modelling

As described above; baseline modelling (presented and discussed above) provides outputs for the future years modelled (2018, 2020 and 2025). The modelling assumption at this point is that no interventions (no air quality actions) are made in an attempt to improve air quality (though the input data includes assumptions about fleet improvements and the number of vehicle movements due to additional housing and a larger local population). The source-apportionment (presented above) allows us to understand how the different classes of vehicles that make up the vehicle fleet contribute pollution to air quality in a specific area. This understanding can assist us in designing interventions that are targeted and proportionate.

To design effective policy it is necessary to focus air quality actions on issues which it is theoretically possible for the Council and it's partners to affect. As such the two scenarios chosen for modelling were improved bus emission standards and modal-shift.

For St Pancras and Rumbolds Hill AQMAs buses are identified as significant contributors of NO_x at 37.8% and 13.9% of all vehicle emissions respectively.

Chichester Buses Low Emission Zone Scenario modelling

WSCC provided details of Stagecoach's current fleet's engine standards and an indication of which routes the vehicles were run on. This enabled model runs to establish the predicted NO_x contribution from the buses to the St Pancras AQMA and all Chichester receptor locations both with the fleet as existing (baseline) and with the fleet fully upgraded to Euro VI engine standard.

The full details of this scenario are in the air quality modelling 'Report 2: Scenario Modelling'. For several receptor locations this scenario makes a significant difference in the predicted NO₂ concentration compared to the baseline. For The Hornet, St Pancras and Orchard Street the predicted reduction in the annual mean concentration is of the range -2.9 µg_m⁻³ to -3.5µg_m⁻³ at 2021. As such, from a pure air quality perspective this scenario is a priority action for this plan.

Modal shift scenario

Modal-shift is getting people out of their cars to greener modes of transport and, where possible, to walk and cycle. Walking and cycling are zero emission forms of transport and are ideal, subject to many variables, for local journeys. AQAPs commonly seek to affect transport mode choice and in particular to promote walking and cycling. As such two modal-shift scenarios, of 2% and 5%, were modelled.

The maximum annual mean NO₂ concentration reduction predicted by the 5% modal-shift (to zero emission transport) at 2021 was -0.9 µg_m⁻³ for Chichester and -0.4 µg_m⁻³ for Midhurst. Nevertheless mode-shift has a multitude of co-benefits for physical health, mental health and climate change and remains a priority for this AQAP.

15. Required reductions in emissions

DEFRA require that authorities detail the reduction in emissions required for a location to become compliant with the relevant air quality standard.

Orchard Street AQMA

Air quality monitoring data from Orchard Street indicates that air quality at that location has been compliant with the annual mean NO₂ standard for over five years. Furthermore the five year trend in air quality there is towards greater compliance and the degree of compliance is now significant.

Air quality modelling data for Orchard Street builds on the evidence from the air quality monitoring and suggests that at 2020 the degree of compliance will be approximately 7 µg_m⁻³ (or 17.5%) and by 2025 the degree of compliance will be 10µg_m⁻³ (or 25%).

Given the length of time that air quality at Orchard Street has been compliant and the comfortable degree of compliance currently and predicted for the future then it is concluded that this AQMA is a

candidate for being undeclared. CDC will wait to see next year's air quality data (in spring 2022, hopefully once the economy has recovered post-Covid's economic impact) and, in the event that it confirms the conclusions here, will move to un-declare the Orchard Street AQMA.

Stockbridge A27 roundabout AQMA

Worst-case air quality monitoring data from the Stockbridge AQMA indicates that air quality at that location has been compliant with the annual mean NO₂ standard for three years. Furthermore the five year trend in air quality there is towards greater compliance and the degree of compliance is now significant.

Air quality modelling data for Stockbridge AQMA builds on the evidence from the air quality monitoring and suggests that at 2020 the degree of compliance will be approximately 10 µgm⁻³ (or 25%) and by 2020 the degree of compliance will be 15µgm⁻³ (or 38%).

Given the length of time that air quality at Stockbridge has been compliant and the comfortable degree of compliance currently and predicted for the future then it is concluded that this AQMA is a candidate for being undeclared. CDC will wait to see next year's air quality data (in spring 2022 hopefully once the economy has recovered post-Covid's economic impact) and, in the event that it confirms the conclusions here, will move to un-declare the Stockbridge AQMA. This position is caveated by CDC's consideration of what, if anything, HE might propose for the A27 improvements and specifically whether such proposals amend the junction layout at Stockbridge.

Rumbold's Hill, Midhurst AQMA

At the current time Rumbold's Hill's air quality monitoring data indicates that air quality there is at parity with the Air Quality Standard. As such air quality at this location is compliant, albeit very marginally. Given the reduction in traffic volumes through the period of Covid-19 then we anticipate that the 2020 monitoring data will not be a reliable metric by which to establish any indication of a trend in pollution concentrations. As such it seems likely that the first data useful in making judgements about pollution trends at this location will be available in the spring of 2022.

In any case the air quality modelling for this location suggests a trend of increasing compliance.

As such there is no required reduction in pollution levels in this location in order to achieve compliance. Nevertheless a watching brief is recommended of a minimum period of four years prior to making any decisions as to whether the AQMA remains or could be un-declared.

St Pancras AQMA

Air quality monitoring at St Pancras continues to measure non-compliance with the Annual Mean Standard for Nitrogen Dioxide and air quality modelling suggests borderline compliance at 2025. Nevertheless the model performance issues described above make us more reliant on the monitoring data for this site.

The 2019 - 2020 monitored annual mean for NO₂ was 42µgm⁻³.

Required Reduction in Emissions for St Pancras

DEFRA Guidance suggests that AQAPs contain an estimate of the reduction in emissions necessary to deliver compliance with the AQS should be presented in AQAP's.

The monitoring and modelling data described above shows that only the air quality at St Pancras, Chichester is currently non-compliant and is predicted to be non-compliant until 2025. As such it is only necessary that CDC calculates the reductions in emissions necessary to achieve the AQS for St Pancras, Chichester as all other locations are already compliant, albeit for the case of Rumbolds Hill the compliance is borderline.

The calculation for the reduction necessary at St Pancras, Chichester is presented³³ at Appendix 4 and is calculated as 7.2% decrease in road NO_x emissions based on the 2019 diffusion tube measurement made at St Pancras of 42µgm⁻³ and allowing for a background concentration of 13.87µgm⁻³ as NO_x. This is the reduction in NO_x emissions necessary for the air quality at St Pancras to become compliant with the relevant Air Quality Standard (ie 40µgm⁻³ stated as an annual mean NO₂ concentration). The necessary road NO_x reduction is useful in the context of the scenario modelling reported above which predicts what is achievable through improved emissions from buses and from transferring car journeys to walking and cycling ('Smarter Choices'). There are many other sources of NO_x and although it was not possible to model these they remain important in seeking to reduce ambient pollution. The private licensed hire fleet and hackney cabs are such an example.

16. The Way Forward

Traffic is the dominant source of local air pollution for Chichester and Midhurst (where our AQMAs are located) and so our overall focus is on measures that tackle transport emissions. We are aware that road transport plays a vital role in all of our lives and so the overall approach here is not anti-car but more pro-choice, leadership and fostering change. Like many complex problems there is no single solution but more the aggregation of marginal gains from many measures to assist in tackling the issue. Our priorities should simultaneously assist in tackling climate change/greenhouse gas emissions as we recognise that the two issues of poor air quality and climate change are highly interrelated.

Whilst our AQMAs are all discreet locations in Chichester and Midhurst the effect of air quality actions should be beneficial in tackling air pollution and climate change gases in all locations.

17. Conclusions and recommendations from the Monitoring and Modelling

- Move to undeclare Orchard Street and Stockbridge A27 Roundabout AQMAs,
- maintain a watching brief for St Pancras and Rumbolds Hill AQMAs,
- maintain a watching brief for all other locations of interest including; The Hornet, Whyke, A27 roundabout and Oving Road cross-roads,
- decommission the real-time ozone monitoring station at Lodsworth and

³³ The calculation is made in accordance with DEFRA Guidance TG(16), page 7-35, Box 7.6.

- develop on-going actions to continue to tackle the remaining issues.

18. Air Quality Actions - Key Themes

Theme 1: Support for development of sustainable transport measures

A wide range of measures are required to support the development of alternative low emission and low carbon transport, including transport management measures and investing in public transport infrastructure. Many of these measures will be developed in partnership with the WSCC as the Transport Authority.

- We will continue to develop and move to implement our LCWIP.
- WSCC are in the process of considering how they will roll out EV charge points largely for households who do not have the benefit of off-street parking. This work is in conjunction with district and borough councils and we will consider CDC's position with regard to this work once the full details are known.
- We will continue to seek monies for the delivery of sustainable transport related projects.
- We will support progression of the programme of projects identified by WSCC through the Chichester Area Sustainable Transport Package.
- Consider the implementation of secure bike parking in relevant locations.
- Consider the introduction of bike hire schemes.
- Consider cargo bikes to reduce last-mile delivery emissions and cargo consolidation

Theme 2: Support for the uptake of low and zero emission vehicles

This will look at measures such as low emission vehicle infrastructure development to encourage the uptake of electric and other low emission vehicles. This theme will also cover low emissions behaviours such as eco-driving and anti-idling policies.

To foster change towards zero emission vehicles we will:

- Work with WSCC and bus operators to encourage reductions in bus emissions, support the tightening of emissions standards in contracted services and explore funding opportunities to reduce bus emissions.
- Work with the council's taxi licensing team and wider partners to deliver infrastructure that will support the electrification of hackney cabs and private hire vehicles.
- Work with WSCC and local businesses to explore the development and implementation of a local fleet recognition scheme³⁴.
- Promote the uptake of EVs by working with our partners to install EV charging infrastructure³⁵.
- Continue to develop ULEV and ZEV vehicles in our own fleet.
- Work to deliver a pilot pool car fleet for CDC to include ULEV and ZEV vehicles.
- Promote the development of ULEV and ZEV car clubs across the district.
- Promote the understanding of EVs for businesses in the district

³⁴ One such scheme is Eco-stars <https://www.ecostars-uk.com/>

³⁵ CDC currently has a watching brief for the installation of EV charging points where we are monitoring the usage statistics of our current network before they suggest that further installations should be considered.

- Seek to understand the impact of ZEVs on air quality in Chichester and Midhurst.

Theme 3: Planning for sustainable transport

New development provides the opportunity to support sustainable transport both through the form of the development and new infrastructure. This provides the opportunity to use Community Infrastructure Levy (CIL) and Section 106 agreement funding to support wider sustainable and low emission transport projects.

We will seek to strengthen the use of the planning system to further reduce transport emissions as follows:

- Ensure that air quality assessments for new development are appropriate and robust.
- Work with our planning policy team to incorporate robust policies and supporting documentation that encourage the delivery of development that considers and responds to air quality issues and challenges.
- Explore policy measures that require developers to provide investments in and contributions to the delivery of low emission transport projects and measures to off-set emissions both on and off of development sites.
- Seek to associate a GIS layer of aspirational walking and cycle routes with a sustainable transport policy in the Revised Local Plan. The GIS layer will contain routes from CDC and WSCC's LCWIPs as well as schemes described by WSCC's Sustainable Transport Package and Local Transport Infrastructure Plan.
- WSCC are in the early stages of rewriting the West Sussex Transport Plan. In conjunction with Sussex-air we will seek to embed air quality policy and considerations within that document and the policies therein.

Theme 4: Managing the Council's own transport emissions

The Council must lead by example by reducing emissions from our own transport activities with regards to fleet vehicles, business travel and contracted transport services and deliveries.

- We will continue to work to implement our policy that 'all new council cars and vans shall be electric unless there is a business case as to why not'.
- Continue to assess our fleet in terms of mileage management and efficient routing of vehicle movements.
- Tackle CDC grey-fleet mileage through delivery of an ULEV and EV pool car fleet for staff business mileage with a view to expanding the fleet after evaluation of the pilot project.
- Encourage staff travel to and from work to be by the most sustainable means through the provision of the Easit scheme and offering the staff benefit of vehicle leasing which most encourages the take up of EVs.
- Deliver a small fleet of electric bikes equipped such that staff can make work related journeys on them.

Theme 5: Developing partnerships and public education

By working with key stakeholders we can consider partnerships to share resources and develop wider strategies to deliver greater benefits. We believe that there is the willingness by the public to

engage in actions to reduce emissions and CDC relies on partnerships to widen it's reach and the possibility of success.

To foster a partnership approach and target our messaging we will:

- Write a communications plan for air quality.
- Consider anti-idling campaigns at locations such as railway level crossings, school gates and bus/coach-stops³⁶.
- Work with WSCC to promote the incorporation of stop / start technology on buses.
- Continue to be an active member of the pan-Sussex Sussex-air group of local authorities and academics.
- Continue to attend and participate in any WSCC hosted working groups.
- Continue to attend the Chichester and District Cycle Forum.
- Continue to support the Sussex-air 'Air-alert' pollution warning system.
- Consider invites to new partnership meetings with relevance to transport emissions.
- In partnership with WSCC consider support for Play Streets

Theme 6: Miscellaneous projects

In speaking to councillors and other key interested parties we have received many ideas as to how we might improve air quality.

- Consider declaring Smoke Control Areas which would allow for regulatory oversight for the quality of firewood and stoves being sold. This mainly relates to tackling particulate emissions.
- To include in the Communications Plan for Air Quality a specific thread on domestic burning, bonfires, fire-pits, open-fires and wood burners.
- Greening the council's procurement policy. In procuring goods and services the council must demonstrate 'best value' in its use of public money. Nevertheless 'green' related considerations can be considered through the quality considerations of procurement.
- Consider green walls and tree planting to help improve air quality.

19. Priorities for Action

The following tables expand on the broad ideas for actions as set out above. Proposed actions are highlighted together with those which are already in progress and/or partially delivered. The majority of all air quality actions for all authorities are subject to funding. As such our list of actions is not prioritised. In our experience the implementation of air quality action is driven by the availability of external grant monies which do not accord with locally set priorities. Once this Plan is adopted then the inclusion of the actions as described below facilitate the Council to seek grant money as and when relevant monies become available. The Council has had some success in accessing grant monies and so we believe that progress toward delivery of the actions below, over the Plan period, is realistic and deliverable.

³⁶ Where buses and/or coaches might sit idling for extended periods.

Notwithstanding the above the modelling (summarised at 12 above) points to the importance of upgrading the Euro standard of the buses and the continued development and expansion of our LCWIP remain of the highest importance to take forwards as finance allows.

Note: monitoring air quality is not mentioned in the action planning tables as below. Nevertheless, subject to the changes suggested in the pages above, air quality monitoring will continue across the district across the period of the AQAP.

Key Priority Area	Measure	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in AQMA	Progress to Date	Estimated Completion Date	Associated Benefits	Chichester (C) and/or Midhurst (M)
Support for development of sustainable transport measures	Continue to develop the Chichester City LCWIP	CDC, partnered by WSCC	on-going	2021 - 2031	Schemes bought forward to feasibility studies, detailed design and implementation. Further LCWIP developed for Midhurst. Inclusion of LCWIP schemes in CDC Local Plan Revision.	Modal-shift NOx reductions estimated in Air Quality Modelling Report	Draft GIS layer of schemes completed.	on-going	Tackles carbon emissions and promotes public health and wellbeing.	C & M
	Roll-out of EV charging for homes without the benefit of off-street parking.	WSCC in partnership with all DnBs and potentially CDC	on-going	2021 - 2026	CDC to consider whether to be part of WSCC's approach to delivery once WSCC's approach is defined.	NOx reduction not estimated but	Considered at Environment Panel and Cabinet	on-going	Tackles carbon emissions too	C & M
	Seek monies for sustainable transport projects	partnered and supported by WSCC and Sussex-air	on-going	2021 - 2026	Grant monies won	NOx reduction not estimated	Various grant awards during the 2015 AQAP period	on-going	Likely to tackle carbon emissions too	C & M
	Secure bike parking in relevant locations	CDC partnered by WSCC and possibly Southern Rail	on-going	2022 - 2026	Installation of secure bike parking facilities	NOx reduction not estimated	None	on-going	Encourages cycling and active lifestyle with co-benefits for physical and mental health	C & M
	Bike hire schemes	CDC in partnership with WSCC	on-going	2021 - 2026	Installation of bike hire scheme(s)	NOx reduction not estimated	Various discussions with providers	on-going	Encourages cycling and active lifestyle with co-benefits for physical and mental health	C & M
	Cargo bikes for last mile and city centre deliveries	CDC in partnership with WSCC and BID etc	on-going	2022 - 2026	Purchase cargo bike	NOx reduction not estimated	None	on-going	Fosters behavioural change by setting an example	C & M

Support the uptake of zero emission vehicles	Upgrade as high a proportion as possible to zero emission and to expedite / facilitate the process or as a minimum to Euro VI	WSCC with CDC and potentially Sussex-air providing air quality support	on-going	2023 - 2026	Number of buses upgraded to Euro VI	Nox reduction targets estimated in Air Quality Modelling Report.	Approaches made to bus companies via Sussex-air under the previous AQAP. WSCC are aware of the Air Quality Modelling.	on-going	Climate change benefits too	C & M
	Improve emissions standards for CDC's Taxi Licensing Standards	CDC	Jan-21	2021	Improved emissions standards, maximum age for vehicles entering the fleet and possibly early review of the policy as EVs achieve greater market penetration	Insufficient data available to enable modelling	Discussions between CDC Licensing, Climate Change and Environmental Protection Team	2021	Climate change benefits too	C & M
	Work with WSCC and local businesses to explore the development and implementation of a local fleet-recognition scheme	CDC, WSCC	on-going	2023 - 2026	Launch of scheme and fleet operators becoming members of the scheme	NOx reduction not estimated	Discussions at Sussex-air	2023 - 2026	Climate change benefits too	C & M
	Deliver EV charging points at locations that will enable taxis to transfer to EV technology	CDC, WSCC	on-going	2024 - 2026	Grant and/or EV charge points in relevant locations	NOx reduction not estimated but potentially significant	Early discussions with CDC Licensing Team and at Sussex-air. A relevant grant might facilitate such action.	2024 - 2026	Climate change benefits too	C & M
	Promote development of ULEV and EV car clubs across the district	CDC potentially pertnered by WSCC	on-going	2023 - 2026	Expansion of existing (6 car) car club, both geographically and by number of vehicles	NOx reduction not estimated	CDC currently funded for one additional car club vehicle	on-going	Members of car clubs demonstrably use alternative modes more often. CC benefits too	C & M

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Support the uptake of zero emission vehicles	Promote the understanding of EVs for businesses	CDC, WSCC, BID, Chamber of Commerce etc	on-going	2021 - 2026	Inclusion within Comms Plan and roll-out.	NOx reduction not estimated	None	on-going	Wider air quality and CC benefits	C & M
	Seek to understand the impact of EVs on AQ in Chichester and Midhurst	CDC, WSCC	As required	2021 - 2026	Continued monitoring in the AQMAs and environs and possible additional modelling.	Not applicable	Existing modelling provides some insight into the impact of mode shift and Euro VI buses	As required	Enhanced understanding of AQ impacts of EVs	C & M

Planning for Sustainable Transport	AQ assessments for planning applications	CDC	on-going	2021 - 2026	Planning applications considered for the air quality impact on them or the predicted air quality impact from them	NOx reduction not estimated	On-going consultation for proposed development as it passes through the DM system	on-going	Assists in designing out air quality impacts	C & M
	Inclusion of air quality related policy in the Revised Local Plan	CDC	2021	From Revised Local Plan adoption onwards	Relevant policy in the Local Plan Review. Possibly includes Sussex-air's Low Emissions Guidance being associated with the Local Plan Revision	Not broadly applicable	Discussion between Environmental Protection and Planning Policy Team	2022	Assists in including air quality considerations in future planning decisions.	C
	Embed a GIS layer of walking and cycling routes in the Local Plan Revision	CDC with significant input from WSCC	2021	From Revised Local Plan adoption onwards	GIS layer embedded in the Revised Local Plan	Modelling estimates NOx reduction associated with 2% and 5% modal-shift	Discussion between Environmental Protection and Planning Policy Team. Early draft GIS layer	2022	Fosters delivery of walking and cycling routes with AQ, CC and public health benefits	C
	Review of on-street parking arrangements in Midhurst	WSCC, CDC	on-going	Subject to funding	Bid for grant suitable for funding such an approach	NOx reduction not estimated	email exchange between relevant partners only	on-going	Encourages alternative modes to access retail and town centre	M
	Inclusion of air quality policy in the revised Local Transport Plan (LTP3)	Sussex-air, CDC and all other West Sussex DnB's	2021	2023	Inclusion of air quality policy	NOx reduction not estimated	Early discussions with WSCC	2023	Includes air quality considerations in Transport Planning decisions.	C & M

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Managing the Council's own transport emissions	Continue to implement the Council's policy that 'all replacement cars and LGVs will be electric unless there is a business case as to why not'	CDC	on-going	2025 - 2026	Growth in the number of EVs in the CDC fleet (currently 2)	NOx reduction not estimated	Policy and exception reporting in place. CCS actively exploring greater integration of EVs into the fleet	on-going	Climate change benefits too	C & M
	Deliver a pool car fleet for CDC staff to utilise on work related journeys	CDC	Jan-2021 - April 2021	2021 - 2022	Two pool cars available for staff use, one of which is EV and a double-socket charge point to support	NOx reduction not estimated	Internal working group proceeding to delivery	2021 - 2022 (potential expansion after evaluation)	Climate change benefits too	C & M
	Encourage staff green travel for all journeys both private and work related through provision and promotion of Easit scheme	CDC	Complete	on-going	Numbers of staff joining Easit and making journeys using Easit discounts (monitored through travel claims)	NOx reduction not estimated	Implemented	annual renewal	CC, social and AQ benefits	C & M
	Provide a small fleet of suitably equipped ebikes for staff to use for local work related journeys	CDC	2021	2021 - 2022	Miles displaced to ebikes / expansion of the number of e.bikes	NOx reduction not estimated	Part of staff travel group post Covid recovery work. Budget identified	2021 - 2022	Reputational, CC, health and AQ benefits	C
	Continue to assess CCS fleet in terms of route optimisation using software	CDC	2021	2021 - 2022	Implementation of waste collection routes designed by software. Reduced mileage for waste collection vehicles	NOx reduction not estimated	Software purchased and being implemented	2022 - 2023	Reduced fuel costs for CDC	C & M

Developing partnerships and public education	Produce a communications plan for air quality	CDC	2021 - 2022	2022 - 2026	Tweets, Facebook posts and newspaper articles on the subject of air quality	Nox reduction not estimated	Highlighted with CDC PR	2022
	Deliver anti-idling campaigns in targetted locations	CDC in partnership with WSCC	2021 - 2022	2022 - 2026	Number of campaigns delivered and count of interactions with customers	NOx reduction not estimated	None	2022 - 2026
	Continue to participate in Sussex-air	WSCC and Adur and Worthing	on-going	2021 - 2026	Attendance at meetings	Not applicable	CDC has attended the group regularly	on-going
	Support Air-Alert	Sussex-air	on-going	2021 - 2026	Incude link to airAlert on website	Not applicable	Implemented/ongoing	on-going
	Contribute to a new local business 'Easit' group	CDC, WSCC, BID, Chamber of Commerce etc	2021	2021 - 2026	New group set-up and meetings convened	Nox reduction not possible to estimate	Discussed with WS NHS and agreement in principle	2021

Support for development of sustainable transport measures	Continue to develop the Chichester City LCWIP		on-going	2021 - 2031				on-going		C & M
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Miscellaneous projects	Consider declaring Smoke Control Areas	CDC	2022	2023	Smoke Control Zones declared	Non-AQMA related action. This action is targetted at particulate (PM10 and PM2.5 emissions)	None	2023	Educates public regarding the health risk from solid fuel burning both in wood burners, open grates, bon fires and fire pits. CC and AQ issue	C
	Tree/shrub planting and/or 'green-walls' to improve air quality	CDC	2021	2021 - 2023	Number of trees/walls planted	Non-AQMA related action. There is inadequate room in all existing AQMAs to plant trees and doing so might make air quality worse	Tree Officer employed in the climate change team	2024	Wellbeing from aesthetically 'softened' urban settings, minor AQ benefits, mainly CC benefits	C
	Promote use of the car parks	CDC	2022	2022 - 2024	Local campaign to encourage use of CDC car parks to minimise parking on North Street	Nox reduction not possible to estimate	None	2024	Potentially smoother traffic flow	M
	Consider the use of on-street parking for a Low Traffic Neighbourhood type approach	CDC, WSCC	2023	2024	Discussion with WSCC/ implementation	Nox reduction not possible to estimate	None	2024	Fostering modal shift	C/M

Development and Implementation of Chichester District AQAP

In developing this draft for consultation AQAP, we have worked with the local authorities across East and West Sussex, the Environment Agency, to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 13 below.

Table 13: Statutory consultees for the AQAP:

Consultee:
The secretary of State
The Environment Agency
The Highways Authority
All neighbouring local authorities
Other public authorities as appropriate
Bodies representing local business interests and other organisations as appropriate

The response to our consultation stakeholder engagement is given in Appendix 1.

Glossary of terms

Abbreviation:	Meaning:
AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
AQO	Air Quality Standards and Objectives contained in the UK Air Quality Regulations
Canyonised	A street where the buildings are tall in relation to its width
CDC	Chichester District Council
DEFRA	Department of Environment, Food and Rural Affairs
DfT	Department for Transport
ERG	Environmental Research Group (part of King's College London)
EU	European Union
GIS	Geographic Information System – a digital mapping software system
Imperial	Imperial College London
IPPC	Integrated Pollution Prevention and Control
LAQM	The Local Air Quality Management regime
LEP	Local Enterprise Partnership
LTP	Local Transport Plan
Modal-shift	Changing transport modes to greener modes
NO ₂	The pollutant Nitrogen dioxide
NO _x	The pollutant 'family' Oxides of Nitrogen
OLEV	Office for Low Emission Vehicles (part of DfT)
PM ₁₀	Particulate matter smaller than 10µm in diameter
PM _{2.5}	Particulate matter smaller than 2.5µm in diameter
PPB	Parts per billion
WSSC	West Sussex County Council

Appendix 1: Response to Consultation

Appendix 2: Reasons for Not Pursuing Action Plan Measures

Table xx: Action Plan Measures Not Pursued and the Reasons for that Decision

Table 14: Action Plan Measures Not Pursued and the Reasons for that Decision:

Action Category	Action Description	Reason Action is not being pursued (including Stakeholder views (WSCC Highways))
Sustainable transport	Provision of electric scooter hire	escooters are not yet legal on the Highway (including the footway). Some of Midhurst's pavement is unsuitable for escooters (features cobbles).
Reviewing parking charges	Differential parking charges to favour EVs	EVs are no longer a novel product and are predicted to reach price point parity within two years. No market subsidy in the form of parking charges is required to now ensure their success. CDC has previously provided free parking and electricity at two 3kW charge points which in 2017 led to complaints about access to the EV charge points (demand out-stripped supply).
Highways improvements	Traffic lights at either end of Rumbolds Hill	Potential significant concerns due to knock on impacts on traffic congestion/queuing in Midhurst due to inter-green time for traffic held across at least 3 if not 4 arms of the roundabout (depending on approach to accessing West St)
Highways improvements	Widening pinch point on Rumbolds Hill - Nat West Bank currently vacant.	Un-realistic and over-scale for the AQAP especially as air quality is predicted to achieve compliance.
	Re-routing of large HGV's away from A272.	A272 is part of the West Sussex advisory lorry route network as it is the most appropriate route of those available for HGV movements in the area.

Appendix 3: Rumbolds Hill, Air Quality Management Area

Ideas for inclusion in the Air Quality Action Plan for Midhurst (Chichester District):

CDC officers attended the Midhurst Vision Group and discussed the AQAP for Midhurst with individual CDC and WSCC councillors and SDNPA officers. Ideas harvested from both those meetings and related correspondence were discussed with WSCC. The resulting air quality actions are listed as below:

1. Car-sharing / car-club
2. Ongoing development and delivery of Midhurst Greenway
3. Promote use of the car parks
4. Employ a traffic consultant to review Rumbolds Hill and Midhurst High Street (for; goods deliveries, potential for cycling on North Street, novel use of space to better manage delivery traffic, placement of street furniture to discourage parking in selected locations, short-term parking on Church Hill by TRO, Review pedestrian crossings' timing and sequencing, retractable bollards on North Street to prevent people parking in delivery bays, Make Church Hill junction left in left out only and a signed priority system at Rumbolds Hill.
5. Further develop the SDNPA LCWIP for Midhurst (including Jubilee Path informal crossing)
6. Anti-idling campaigns
7. Review parking charges
8. Increase parking enforcement
9. Active travel plan for Midhurst
10. Encourage the use of electric vehicles, cycling and walking

Ideas proposed by the group but rejected for inclusion in the Air Quality Action Plan:

Suggestion:	Reason for being rejected for inclusion in the AQAP:
To completely remove all car parking in North Street and only allow deliveries.	Would potentially pose issues for persons with mobility issues.
Creation of a town bypass.	Over-scale for the AQAP.
Expand North Street car park behind North Street.	It is not clear that this would have any significant benefit for air quality.
Traffic lights at either end of Rumbolds Hill	Previously rejected by WSCC Highways.
Widening pinch point on Rumbolds Hill - Nat West Bank currently vacant could be compulsorily purchased.	Un-realistic and over-scale for the AQAP.
Re-routing of large HGV's away from A272.	Previously rejected by WSCC Highways.
Permissive walking route through Cowdray to connect Easebourne to Midhurst.	This idea requires discussion with the land-owner before it is to be included in a public document. Nevertheless the idea has some merit.
e.scooter hire.	escooters are not yet legal on the Highway (including the footway)
More parking enforcement.	Beyond the scope of the AQAP. Idea forwarded to CDC Parking Services. This is more of a Parking policy issue.

<p>Parking charge amendments to encourage people to park their cars in the car parks and not on North Street.</p>	<p>Idea forwarded to CDC Parking Services. This is a Parking policy issue.</p>
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Appendix 4: Calculation to determine the Road NO_x Emission necessary to achieve compliance at St Pancras, Chichester:

The calculation is made in accordance with the guidance: DEFRA, Local Air Quality Management, Technical Guidance (TG16), April 2016, page 16, Box 7.6 (note the method deviates from the TG(16) but was confirmed by the LAQM Helpdesk 25-11-2020):

Calculation for 2018 NO₂ diffusion tube result:

Converting the 2018 diffusion tube measurement of 45µgm⁻³ NO₂ to its equivalent NO_x value ≡ 72.93µgm⁻³ NO_x ('Road-NO_x-Current').

NO_x background concentration = 13.87 µgm⁻³ from DEFRA Background maps (using the nearest grid reference to St Pancras, Chichester).

The 'Road-NO_x-Required' value is calculated as 60.95µgm⁻³.

The target reduction is then calculated as:

Road-NO_x-Current – Road-NO_x-Required ie 72.93 – 60.95 = 11.98 µgm⁻³ or stated as a percentage reduction 11.98/72.93 * 100 = 16.4% decrease.

Calculation for 2019 NO₂ diffusion tube result:

Converting the 2019 diffusion tube measurement of 42µgm⁻³ NO₂ to its equivalent NO_x value ≡ 65.58µgm⁻³ NO_x ('Road-NO_x-Current').

NO_x background concentration = 13.87 µgm⁻³ from DEFRA Background maps (using the nearest grid reference to St Pancras, Chichester).

The 'Road-NO_x-Required' value is calculated as 60.88µgm⁻³.

The target reduction is then calculated as:

Road-NO_x-Current – Road-NO_x-Required ie 65.58 – 60.88 = 4.7 µgm⁻³ or stated as a percentage reduction 4.7/65.58 * 100 = 7.2% decrease

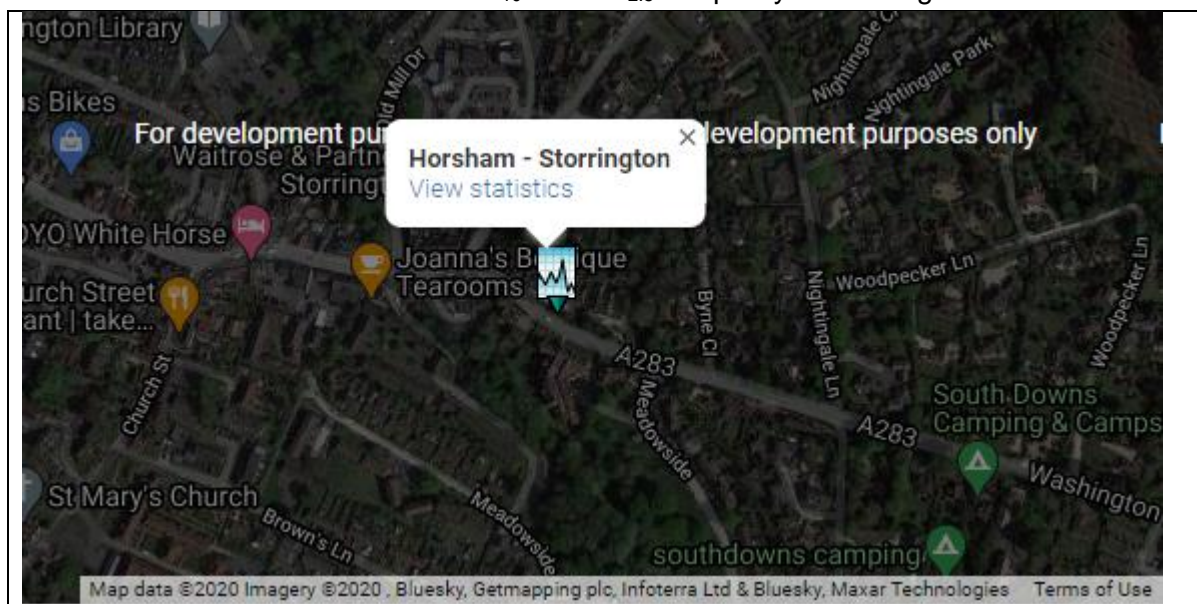
The calculations behind the numbers presented here are carried out on a spreadsheet provided by DEFRA.

Appendix 5: Calculation to estimate PM_{2.5} concentrations in Chichester District:

The calculation is made in accordance with the guidance: DEFRA, Local Air Quality Management, Technical Guidance (TG16), April 2016, page7-36, Box 7.7:

The nearest PM_{2.5} and PM₁₀ air quality monitoring station of which we are aware is in Horsham District Council’s Area at Storrington (Location shown in Plan xx below):

Plan xx: Horsham District Council PM₁₀ and PM_{2.5} air quality monitoring location:



The TG(16) methodology allows us to apply the ratio between PM_{2.5} and PM₁₀ at Storrington to the Chichester PM₁₀ data to estimate the PM_{2.5} concentration at CDC’s air quality monitoring station (ie CDC’s Stockbridge air quality monitoring station derived PM₁₀ concentration). The method applied where all values are as annual-mean concentrations.

Horsham District Council has provided monitoring data from their Storrington air quality monitoring station (the nearest to Chichester) in Table xx below:

Table 15: Horsham air quality monitoring data (PM₁₀ and PM_{2.5} only):

Year:	Annual mean PM _{2.5} concentration (µgm ⁻³):	Annual mean PM ₁₀ concentration (µgm ⁻³):	PM _{2.5} /PM ₁₀ ratio
2016	13.2	18.8	0.70
2015	11.2	15.8	0.71
2014	11.3	N/A	N/A
2013	16.6	23.0	0.72
2012	16.2	20.6	0.79
2011	15.6	22.4	0.70
2010	14.5	20.4	0.71

The Horsham DC monitoring station was shut-down after 2017 and so there is no more recent data than presented above. TG(16) allows a generic factor of 0.70 to be used to estimate PM_{2.5} annual mean concentrations from PM₁₀ annual mean concentrations. In any case it is observed that the TG(16) factor is remarkably similar to the 2013 to 2016 factors derived from Horsham DC's data.

The ratios are then applied to CDC's PM₁₀ monitoring data from the Stockbridge air quality monitoring station in order to estimate the PM_{2.5} concentrations in Chichester District at Stockbridge. Note Stockbridge air quality monitoring station is considered to be a worst-case location for air quality monitoring given it's proximity to the A27 and related volume of traffic.

Table 16: Estimated PM_{2.5} concentrations at Stockbridge A27, Chichester:

Year:	Monitored annual mean PM ₁₀ concentration (at Stockbridge A27 AQMS) (µgm ⁻³):	PM ₁₀ to PM _{2.5} conversion factor ^a :	Estimated annual mean PM _{2.5} concentration (µgm ⁻³):
2019	19	0.70	13.3
2018	18	0.70	12.6
2017	19	0.70	13.3
2016	20	0.70	14.0
2015	21	0.71	14.9

^a 2019, 2018 factors are from TG(16), page 7-36, paragraph 7.109; 2015 to 2017 factors are derived from Horsham DC data as detailed above.

References:

Air Pollution and Street Play 2017, Playing Out
Annual Status Report 2020
Breathing Better; a partnership approach to improving air quality in West Sussex, May 2018
Chichester Air Quality Action Plan Review – 2020, Report 1: Baseline modelling update (2020), August 2020
Chichester Air Quality Action Plan Review – 2020, Report 2: Scenario modelling, August 2020
LAQM PG(16), DEFRA
LAQM TG(16), DEFRA
West Sussex Transport Plan

AQAP – Other consultation responses with a position statement from the Council¹:

Summary of responses received ‘outside’ of the website formal consultation pages:

1	NY on behalf of Midhurst Town Council.	By email 29-06-2021
2	Local resident.	By email 21-06-2021
3	Chichester Society additional comments.	By email 24-06-2021
4	LC on behalf of Earnley Parish Council.	By email 24-05-2021
5	Lavant Parish Council.	By email 20-05-2021
6	Local resident .	By email 02-07-2021
7	Enquiry from Gillian Keegan MP on behalf of a local resident.	By email 01-06-2021

Detail of consultation responses (numbered as in the Table above):

1. Midhurst Town Council raised the following issues²:
 - a. Concern that a watching brief based on existing air quality trends might not be the right approach to Rumbolds Hill AQMA.
 - b. Welcomed an action to look at parking on North Street but didn’t see a link with air quality.
 - c. Questioned whether the vehicle used for the route 60 bus service was oversized based on anecdotal observation that the bus was often carrying a very small number of passengers (‘could fit in a taxi’).

Chichester District Council’s response to Midhurst Town Council’s comments:

The draft AQAP includes actions specific to Rumbolds Hill such that, whilst all actions are subject to funding, the AQAP does seek to tackle the air quality issue at Rumbolds Hill. A view of North Street’s parking arrangements was included in the draft AQAP as a potential action as correspondence from the Midhurst Town Vision group indicated that they viewed this issue to be a contributory factor in the air quality issue. The comment regarding the Number 60 bus service has been passed to WSCC for their information as they have an adopted ‘bus strategy’.

2. The local resident raised the following issues:
 - a. That Councillor Plant’s introduction is misleading and a good news soundbite. Requests that it is changed ‘to reflect reality’.
 - b. That the air quality modelling excludes various residential roads.
 - c. Raises doubts about the motives of the Senior Leadership Team and Cabinet.
 - d. Alleges that the consultation was constructed to deliver a ‘pre-determined result’.
 - e. For PM_{2.5} requests that monitoring is carried out.
 - f. Suggests that the modelling ‘is suspect, open to manipulation to deliver an output that may suit a particular narrative’.
 - g. Suggests that the lack of ‘factual PM2.5 data substantiates the lack of robustness of the draft AQAP.’
 - h. Requests monitoring (‘pilot studies’) on St Paul’s Road and Spitalfield Lane.
 - i. Suggests that the Orchard Street AQMA is ‘extended’.
 - j. Suggests the Council implement a Bluesky Hyperlocal Urban Air Quality Monitor.
 - k. Suggests extending ‘both AQMAs’ (Stockbridge and Orchard Street).

¹ Please note that names of private respondents to the consultation have been removed.

² Note that in all cases in this appendix the ‘issues’ described are summaries of the full responses received. The full responses are available in redacted form on request.

- I. Suggests delaying the staff ebike and pool car project, use savings in officer time and spend council reserves address air pollution.

Chichester District Council's response to local resident:

- a. The evidence that air quality has improved and will continue to improve to the last date modelled is included in detail in the draft for adoption AQAP and we stand by Councillor Plant's foreword which reflects reality as detailed in the data presented in the draft for adoption AQAP.
- b. The Council carefully considered what locations to model, these were generally the AQMAs and other areas where evidence suggests the possibility of poor (non-compliant) air quality. This is all laid out in detail in the AQAP and supporting modelling reports.
- c. The AQAP and documents have all been worked up at officer level and then passed through Environment Panel and Cabinet where they were scrutinised and discussed. This is a matter of normal democratic process and we refute the resident's suggestion to the contrary.
- d. As detailed in c. above we have carried out an open process subject to normal democratic process with no intent to 'deliver a predetermined result' other than to adopt a proportionately ambitious AQAP for the next five-year period as required in law. We refute the resident's suggestion to the contrary.
- e. We agree that PM_{2.5} is an important pollutant, nevertheless work under the Local Air Quality Management regime is informed by statutory guidance and there is no mandate that the Council is obliged to carry out PM_{2.5} monitoring. The Environment Bill includes the intention that the government will adopt a binding PM_{2.5} standard within the life of the AQAP (once/if adopted). Once the government's intentions become clear, and perhaps the statutory guidance is amended to reflect, then the Council will consider its position on PM_{2.5} monitoring. In any case the draft for adoption AQAP includes actions specifically designed to tackle PM_{2.5} and the modal-shift actions and planning related actions will all also contribute to this agenda.
- f. We refute these allegations in the strongest terms. Officers worked diligently to access and agree the model inputs. The model outputs have, in conjunction with the monitoring data, driven the narrative in the report not vice versa. The modelling adheres to the methodology detailed in the statutory technical guidance (TG(16)).
- g. The AQAP's content and the Council's approach to Local Air Quality Management is driven by statutory guidance which does not require that the Council monitors PM_{2.5}. In accordance with the Statutory Guidance provided methodology the draft AQAP provides a calculated estimate of PM_{2.5} concentrations.
- h. We will consider monitoring at these locations as we implement the revised AQAP (if/when adopted).
- i. The evidence, laid out in detail in the draft AQAP supports the proposed 'un-declaration' of the Orchard Street AQMA. There is no evidence that supports its expansion.
- j. The council's air quality monitoring has to accord to certain certified standards. The device mentioned does not accord to those standards.
- k. The draft AQAP presents an analysis of data at both AQMAs and across the City. The evidence suggests significant compliance with the relevant Government standard such that 'undeclaring' the AQMAs is proposed. There is no evidence that the Council is aware of to suggest that the AQMAs should be extended.
- l. Staff time savings are non-cash and not 'spendable' in the way suggested, the ebike and pool car projects are live and underway. There is no suggestion that the council will spend 'LA reserves' on tackling air pollution at a time where budgets are very tight and there are many competing budgetary demands to be balanced. Actions in the draft AQAP will be enabled through successful grant bids where possible.

3. Chichester Society raised the following additional comments:
 - a. That there should be more emphasis on differential parking charges in the document.
 - b. That the planning process might 'more strongly' steer outcomes.
 - c. That CDC should replace conventional liquid fuelled vehicles with electric vehicles gradually to keep a cap on costs and allow for as yet non-market ready technologies to play a part if they come to market.
 - d. That councillors should be encouraged to use green travel for their journeys, in part to set an example.
 - e. That the group strongly supports Sussex-air's Air-alert and that there is a need for on-going monitoring of ozone monitoring, strongly opposing the proposed decommissioning of the Lodsworth ozone monitoring station.
 - f. That the proposed Council pool car fleet should be accessible for councillors and the public to use.
 - g. That the proposed Council ebike fleet should be rolled out gradually to monitor use before expansion and the fleet should be accessible to councillors and the public.
 - h. Questions whether, on un-declaring the Orchard Street and Stockbridge AQMAs and decommissioning the Orchard Street air quality monitoring station whether the remaining monitoring will be adequate to evidence a future AQMA if required.
 - i. Suggests that the modal shift ambition should be more positively framed and more ambitious.
 - j. Makes the case that, for the Council's car parks, differential parking charges should be introduced, based on vehicle emissions. Car parks should encourage the uptake of compact vehicles too.
 - k. That the Council could use its land to enable EV's in a car club expansion.
 - l. That the Council should lobby Railtrack to de-link level crossing barriers to achieve shorter 'barrier down' periods.
 - m. That rerouting HGVs from the Midhurst A272 might become a possibility within the lifetime of the document.
 - n. That the planning system could deliver less car dependent development and that pre-planning advice could more strongly press for the case for car clubs on new development.
 - o. That the planning system should seek to minimise the need to travel

Chichester District Council's response to Chichester Society's additional comments:

- a. The possibility of differential parking charges has been discussed with the Council's Parking Services team.
- b. We are working with our planning policy colleagues to maximise air quality's policy presence in the emerging revised Local Plan. It is in the team's work programme to consult on the Sussex-air planning guidance document for inclusion in the Council's planning process in 2021-22.
- c. The current policy is that cars and vans in the Council fleet should be replaced by electric vehicles unless there is business case as to why not. The fleet is relatively small and on a non-synchronised replacement programme allowing for a gradual integration and caution to be built into managers' decisions to buy EVs.
- d. This suggestion will be explored through the internal staff Green Travel working group.
- e. This suggestion will be embodied into the main Environment Panel for their consideration.
- f. This suggestion will be explored through the internal staff Green Travel working group.
- g. The initial investment will be for two ebikes as a pilot project.

- h. As the pilot project to provide a staff pool car fleet develops we will consider this suggestion further. Where possible (for insurance reasons etc) we will make the pool cars available to councillors.
- i. Some word changes to the AQAP have been made to reflect these comments.
- j. Differential parking charges have been discussed by the air quality officer and Parking Services Team in previous years and the air quality officer will, subject to content, make comment on the Council's draft revised Parking Strategy when it is consulted on.
- k. The Council is currently only funded for the car club to be expanded by one vehicle at Swanfield Community Centre. The addition of a EV charging point to the contract is beyond budget and EVs for car clubs are also more expensive. Nevertheless it is agreed that the optimum vehicle for a car club is an EV, both to show leadership and provide the least environmentally damaging solution.
- l. This comment will be shared upwards.
- m. Noted. The air quality officer is live to new possibilities and where possible brings them to the attention of relevant colleagues – in this case WSCC Highways.
- n. In this year's work plan is the intention to associate Sussex-air's planning guidance with the Council's planning process. This should assist in the delivery of development that has lower impact on air quality including through the possibility of car clubs.
- o. Planning policy colleagues have been made aware of this comment.

4. Earnley Parish Council raised the following comments:

- a. That the council should be engaging with private car park owners and tourist destinations to push for more EV charging facilities.

Chichester District Council's response to Earnley Parishes' comments:

The draft AQAP for adoption includes an action to develop a 'communication plan' and we will consider our promotional work in detail as that work item comes forwards.

5. Lavant Parish Council raised the following comments:

- a. Asks about the contribution from Goodwood motor racing and aerodrome. The question is mainly framed around carbon emissions.

Chichester District Council's response to Lavant Parishes' comments:

The air quality standards which the Council is statutorily bound to consider air quality against apply at certain locations. There are no such relevant receptor locations near the motor circuit or aerodrome. Twenty years' worth of air quality monitoring at various locations across the district on busy roads also affords us professional insight into where air quality might fail the relevant standards. For example, pre-Covid, Westhampnett Road had approximately 25,000 vehicle movements per day and receptor locations close to roadside but air quality there is comfortably compliant with Government standards. Carbon emissions are outside of the scope of the AQAP.

6. The local resident raised the following issues:

- a. That anti-idling campaigns are a waste of time and that the council should use its anti-idling powers to tackle the problem at the level crossings potentially using local volunteers.
- b. That the council should be supporting the local bus companies to convert to an electric fleet.
- c. What is being done to reduce private car use by the council.
- d. Residents could be used to service the air quality monitoring programme.

- e. Has the air quality around the candle factory been monitored.
- f. Has any modelling been carried out with regard to modelling for new roads in Chichester.
- g. That council predictions show that pollution is increasing.
- h. Implicitly that the Council should raise revenue from local polluters to fund air quality improvements.

Chichester District Council's response to local resident's comments:

- a. Anti-idling campaigns are one tool whereby we can influence driver behaviour. The Council will be considering the weight to give to this approach once the new AQAP is adopted. The powers to issue FPNs are adoptable and the Council currently has not adopted the powers.
- b. The draft for adoption AQAP includes an action in this regard. In any case this is a WSCC led action.
- c. The AQAP details actions delivered previously and actions for the future aimed at changing the way residents travel. Largely these are modal shift and car club related. Both planning policy and planning development control also deliver policy and development which integrate structure which is designed to help minimise the need for private car use.
- d. There are no plans to enlist local residents to assist in the air quality monitoring programme.
- e. The council is currently investigating the complaints about the 'candle factory' and the resident has been provided with our standard letters and monitoring forms in this regard.
- f. We are not aware of any current plans to build new roads in Chichester. When plans for the A27 are developed the Council will request that air quality modelling is carried out to help inform understanding and our response.
- g. The document details for each site separately that air pollution is reducing (not increasing).
- h. We are not aware of a way of raising revenue from polluters as suggested unless a Clean Air Zone type approach is implemented. The government mandated 33 of these across the UK. Chichester District was not subject to that mandate and in any case given the evidence presented in the draft for adoption AQAP the approach is considered disproportionate.

- 7. Gillian Keegan, MP raised the following issues on behalf of her resident:
 - a. Complains of congestion and related pollution on the A286 south of Stockbridge A27 roundabout to the Witterings.

Chichester District Council's response to Gillian Keegan on behalf of her local resident's comments:

The comments are noted. The Council has, in the past monitored air quality on the Manhood Peninsula but discontinued as air quality there was significantly complaint with the Government standards.

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Revised Air Quality Action Plan Consultation

Analysis report — July 2021

Introduction

The council's Environmental Protection team has drafted a Revised Air Quality Action Plan, which sets out a range of actions that could be taken to continue improving air quality in the district over the next five years. This also proposes that two Air Quality Management Areas no longer need this designation following improved air quality in those locations.

Chichester District residents, businesses, community groups, environmental groups and other relevant stakeholders, were invited to share their views on this proposal in a public consultation.

Executive Summary

- The views of **6,695 people** were recorded as part of this survey through **219 survey responses**. The survey was live between 17 May and 28 June 2021. Responses were received from a range of different individuals and groups, some of which told us that their response represented a number of people.
- To help people get involved in the consultation, a consultation web page was created with a range of Frequently Asked Questions to provide background, context and a glossary of terms used. We reached out to various target groups, including young people, parish councils, local businesses, residents and stakeholders to encourage as many responses from as many different people as possible.
- The majority of respondents either **agreed** or **strongly agreed** with the proposal to continue with a range of existing actions to improve air quality in the district
- The majority of people **agreed** or **strongly agreed** with the ideas to introduce anti-idling campaigns and an ebike and a pilot pool car fleet for council staff work-related journeys, should additional funding be secured. The majority were **neutral** about a review of on-street parking arrangements in Midhurst or a low traffic neighbourhood type approach.
- The majority of respondents **strongly agreed** that new actions to help tackle issues relating to microscopic particles in the air should be included within the plan (**46%**).
- The majority **strongly disagreed** with the proposal to remove the Stockbridge A27 and Orchard Street AQMAs (**28.4%**) with the remainder of the responses fairly evenly split across the other options.
- Most respondents **strongly agreed** (**48.4%**) or **agreed** (**36.9%**) with the proposal to continue monitoring AQMAs at St Pancras and Rumbolds Hill.
- **161** respondents provided further comments at the end of the survey.

Methodology

To understand people's thoughts on the draft plan, an online survey was created. This enabled respondents to comment specifically on some of the key proposals, as well as give their views on the plan as a whole. Paper copies of the survey were available on request.

To help people get involved in the consultation, a range of Frequently Asked Questions were developed and included on the consultation web page to provide background, context and a glossary of terms used. Here, respondents could also find a link to the survey in which they could share their views on the plan. They could also view the findings of the modelling data, which informed the draft policy.

The views of **6,695 people** were recorded as part of this survey through **219 survey responses**, which was live between 17 May and 28 June 2021. Responses were received from a range of different individuals and groups, including residents, parish councils, businesses and community groups, some of which told us that their response represented a number of people. We received feedback from an additional **7** people by email.

Promotion

Branding for the consultation — 'Let's Talk: Air Quality' — was created and used to promote the consultation in a variety of ways, including:

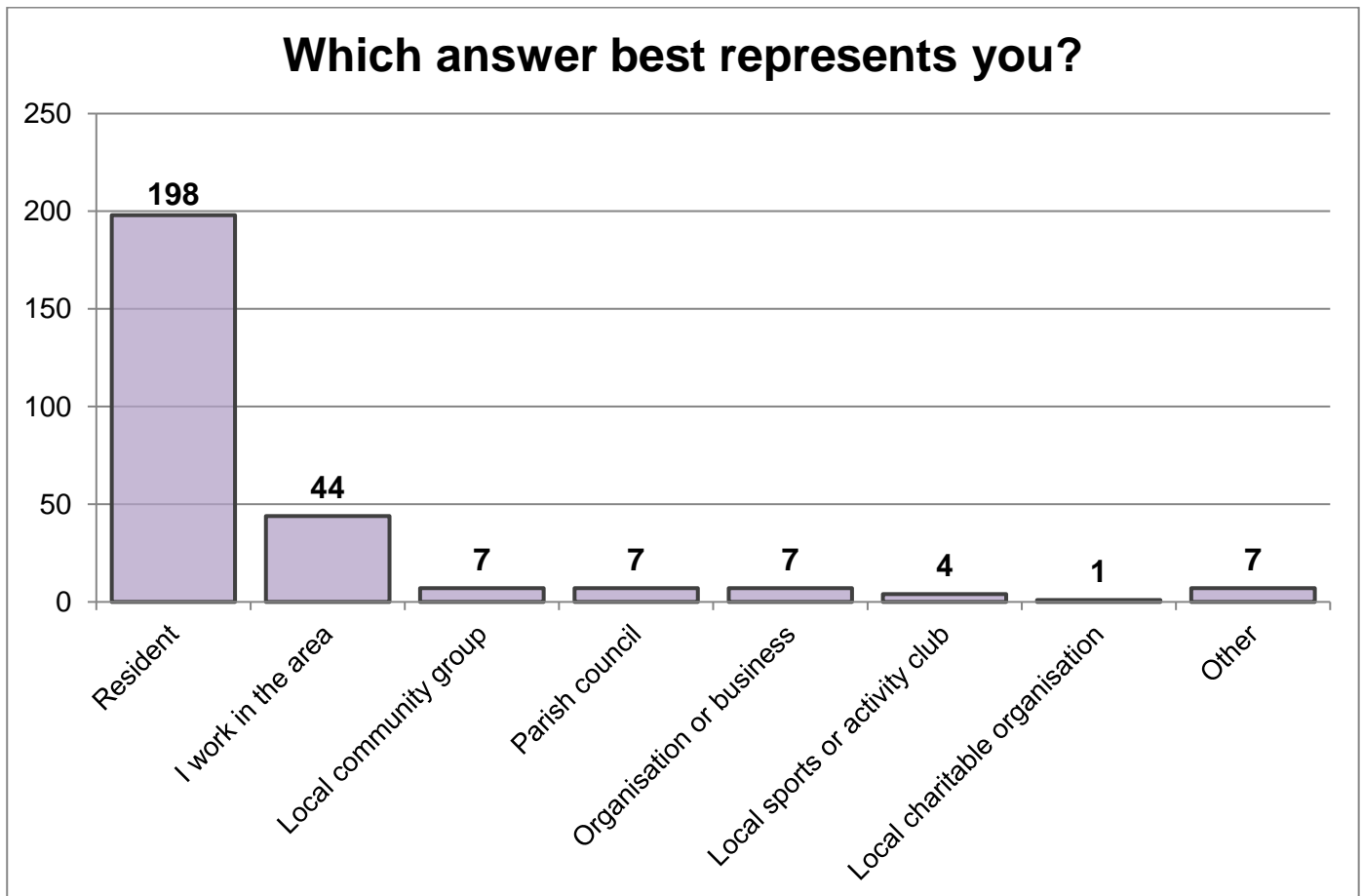
- Working closely with **groups and organisations, including council partners**, such as parish, town and the city council and the University of Chichester.
- Social media platforms, such as **Facebook, Twitter, Nextdoor, LinkedIn and Instagram**, were used to promote the consultation and invite people to take part (a full social media reach breakdown is included in Appendix A).
- On the **council's website**, a campaign banner was developed for the homepage and an advertising banner was displayed at the top of each web page.
- **775 Let's Talk Panel members**, who have all signed up for consultation updates, were notified of the consultation and given details on how to participate.
- A **media release** was distributed to announce the start of the consultation and another reminder release was sent out nearer the consultation deadline.
- The consultation was referred to in two issues of **District Dispatch**, the weekly Leader's column in the **Observer series**.
- The consultation was promoted in the council's general email newsletter and business **email newsletter**.
- The consultation also went out through West Sussex County Council's **6,000 strong 'Your Voice' e-newsletter** and was on their online engagement hub.

A full list of promotions is available in Appendix B.

69 respondents joined the Let's Talk Panel at the end of the survey, and 58 subscribed to the council's email newsletter.

Section One: Respondent Profile

Respondents were asked to select which answer best represents them from a list of options. The majority of respondents (**198**) told us they are district residents. The graph below breaks down the full results.



6 respondents selected 'Other' and specified: I travel through Chichester weekly (1); I visit from elsewhere (3); I am a resident of West Sussex (2).

To spread the word about the consultation across the district, we used a variety of promotional channels, including liaising with parish councils and encouraging members to help us promote the opportunity for their local residents to have their say.

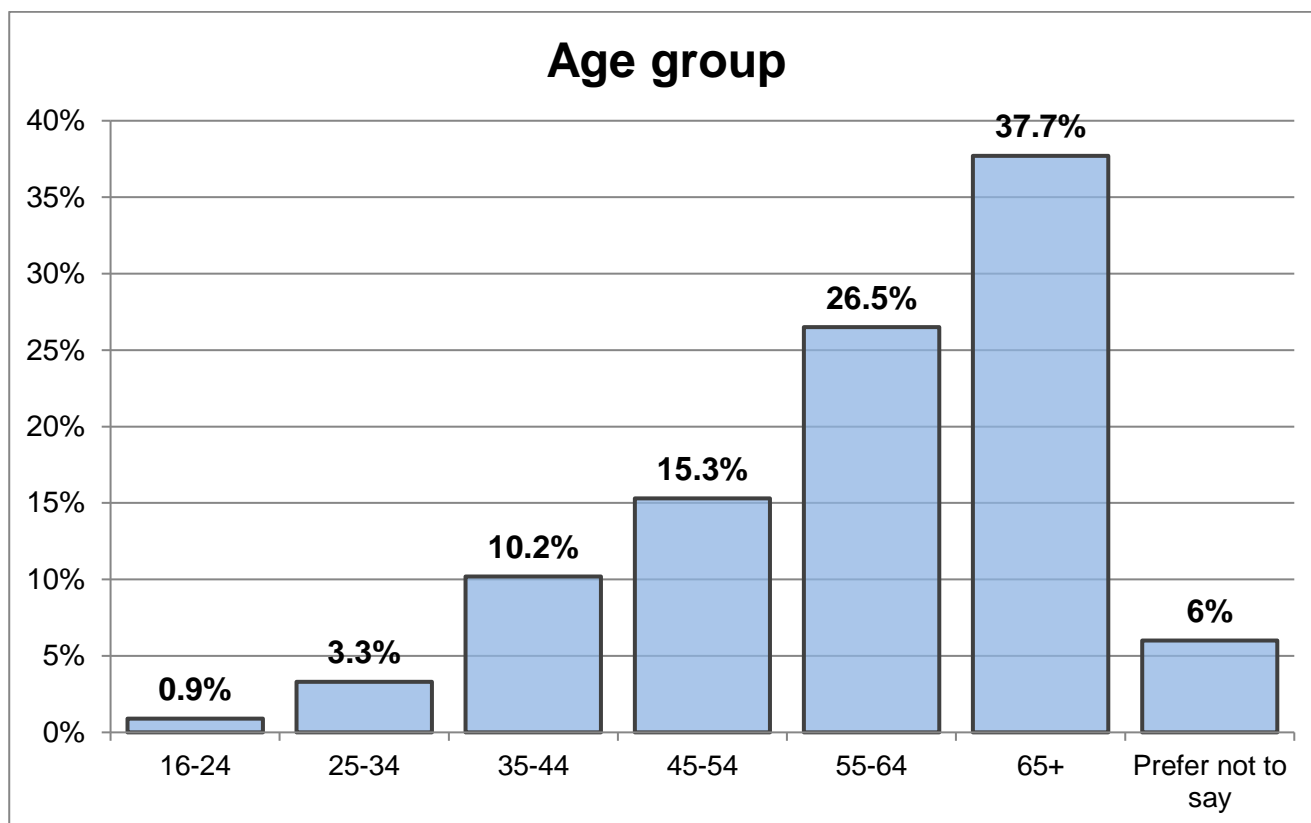
Of the respondents who live in the district, **44%** (59 respondents) said they live in Chichester City. The table below shows the number and percentage of respondents from different areas across the district, from the most responses to the least.

Which area of the Chichester District do you live in?		
Area	Percent	Count
Chichester City	44%	59
Donnington	12.7%	17
Fishbourne	6.7%	9
The Witterings	5.2%	7
Westhampnett	5.2%	7
Selsey	3.7%	5
Birdham	2.2%	3
Boxgrove	2.2%	3
Southbourne	2.2%	3
Bosham	1.5%	2
Petworth	1.5%	2
Tangmere	1.5%	2
Fernhurst	0.7%	1
Midhurst	0.7%	1
North Mundham	0.7%	1
Oving	0.7%	1
Stedham	0.7%	1
Westbourne	0.7%	1
Wisborough Green	0.7%	1
Bury; Chidham and Hambrook; Easebourne; Funtington; Harting; Ifold; Lavant; Nutbourne; Plaistow; Rogate; Sidlesham.	0%	0

7 respondents ticked 'Other' and specified an area in the district, as below:

Hunston	2
Batchmere	1
Bognor Regis	1
Crawley	1
Whyke	1

As part of this consultation, we reached out to various target groups, including young people, parish councils, local businesses and stakeholders. From this, the most responses came from those aged between 65 and older (**37.7%** or 81). The table below details the distribution of age groups across respondents.



There were slightly more male respondents (**49.3%** or 106) than female (**44.2%** or 95) in this consultation. **6.5%** (14) did not wish to disclose their gender.

You can find out more about how we promoted the consultation to different groups in Appendix B.

Section Two: Our Revised Air Quality Action Plan

We asked people how concerned they are about air quality in the district. The majority of those that engaged with our consultation told us they were 'extremely concerned' (**45.4%** or 99 respondents). **25.2%** (55) said they were 'very concerned'; **23.4%** (51) said they were 'somewhat concerned'; and **6%** (13) said they were not concerned at all.

Current air quality schemes

We asked whether respondents were aware of any of the initiatives introduced under the previous or current Air Quality Action Plans. The responses were given as follows. Please

note that as respondents could select more than one choice, percentages have not been included.

Are you aware of any of the following current initiatives, which aim to reduce air pollution in the district?	
Initiative	Count
The introduction of electric vehicle charging points in Chichester District Council owned car parks across the district	150
The development of the Chichester City Local Cycling and Walking Infrastructure Plan , which identifies infrastructure improvements to local cycling and walking networks in and around Chichester City centre.	126
The Co-Wheels car club, a car share scheme in Chichester	120
The introduction of electric vehicles in Chichester District Council's fleet	102
Doubling the number of bike racks in Chichester City Centre to encourage green transport	58
The Selsey Greenway community-led project , a proposed traffic-free shared use route connecting Selsey and Chichester, part-funded by Chichester District Council	34
Community and schools engagement to promote positive behavioural change towards green transport and to raise awareness of air pollution	33

41 respondents said that they weren't previously aware of these schemes.

Proposals to continue existing air quality improvement projects

As part of our draft Revised Air Quality Action Plan, we are proposing to continue with a number of projects that are already in progress. We signposted respondents to the specific pages of the plan relating to these suggestions, and to our range of frequently asked questions where we summarised the plan's suggestions and explained some of the terms used.

Respondents were asked to what extent they thought that continuing with a variety of actions could improve air quality in the district. The majority of respondents either **agreed** or **strongly agreed** with the suggestions. The table below shows agreement and disagreement.

To what extent do you agree that the following actions to improve air quality should be included in our revised Air Quality Action Plan?						
	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not sure
Air quality assessments to help inform Chichester District Council's consideration of planning applications	71% (154)	20.3% (44)	6% (13)	1.4% (3)	1.4% (3)	0%
Implementation of the Chichester City Local Cycling and Walking Infrastructure Plan, which identifies infrastructure improvements to local cycling and walking networks in and around Chichester City Centre	54% (116)	29.8% (64)	12.1% (26)	1.4% (3)	2.8% (6)	0%
Improve emissions regulations for the council's Taxi Licensing Standards	43.1% (91)	39.3% (83)	15.2% (32)	0.9% (2)	1.4% (3)	0%
Promote development of car clubs across the district, using zero emission vehicles where possible	28.6% (60)	33.8% (71)	28.1% (59)	5.7% (12)	1.9% (4)	1.9% (4)
Include air quality related policy in the revised Local Plan	69.6% (151)	22.6% (49)	6% (13)	0.5% (1)	0.9% (2)	0.5% (1)
Embed a GIS layer of walking and cycling routes in the revised Local Plan	52.9% (111)	25.2% (53)	17.1% (36)	1.4% (3)	1.4% (3)	1.9% (4)
Replace Chichester District Council cars and Large Goods Vehicles with electric versions wherever possible, and help to optimise waste and recycling routes	53.1% (113)	32.4% (69)	8.9% (19)	2.3% (5)	2.8% (6)	0.5% (1)

Encourage green travel amongst Chichester District Council staff for all journeys	50% (106)	30.7% (65)	15.6% (33)	2.8% (6)	0.9% (2)	0.5% (1)
Participate in the all Sussex councils' air quality group (Sussex-air), and support Air-Alert, which sends predictions of tomorrow's air quality as well as advice for people with vulnerable respiratory health	54.7% (117)	29.9% (64)	10.3% (22)	2.3% (5)	1.4% (3)	1.4% (3)

Proposals to introduce new actions if additional funding can be secured

The draft plan also sets out some actions that could be achieved if additional funding can be secured. Again, we directed people to the relevant pages of the plan for more information, and to our Frequently Asked Questions for more context.

Respondents were then asked to what extent they thought the following actions should be included in the plan if funding can be secured:

To what extent do you agree that the following actions to improve air quality should be included in our revised Air Quality Action Plan?						
	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not sure
Deliver anti-idling campaigns in targeted locations	48.8% (104)	35.2% (75)	10.8% (23)	2.8% (6)	0.9% (2)	1.4% (3)
Provision of a small fleet of ebikes for Chichester District Council staff to use on work-related journeys	36.6% (78)	32.4% (69)	18.8% (40)	8% (17)	2.8% (6)	1.4% (3)
Delivery of a pilot pool car fleet for Chichester District Council staff to use on work related journeys	25.6% (54)	35.1% (74)	23.2% (49)	8.5% (18)	4.3% (9)	3.3% (7)
A review of on-street parking arrangements in Midhurst	10% (21)	21.9% (46)	52.4% (110)	3.8% (8)	1% (2)	11% (23)

Consider the use of on-street parking for a Low Traffic Neighbourhood type approach	16.4% (34)	24.2% (50)	31.4% (65)	11.6% (24)	5.8% (12)	10.6% (22)

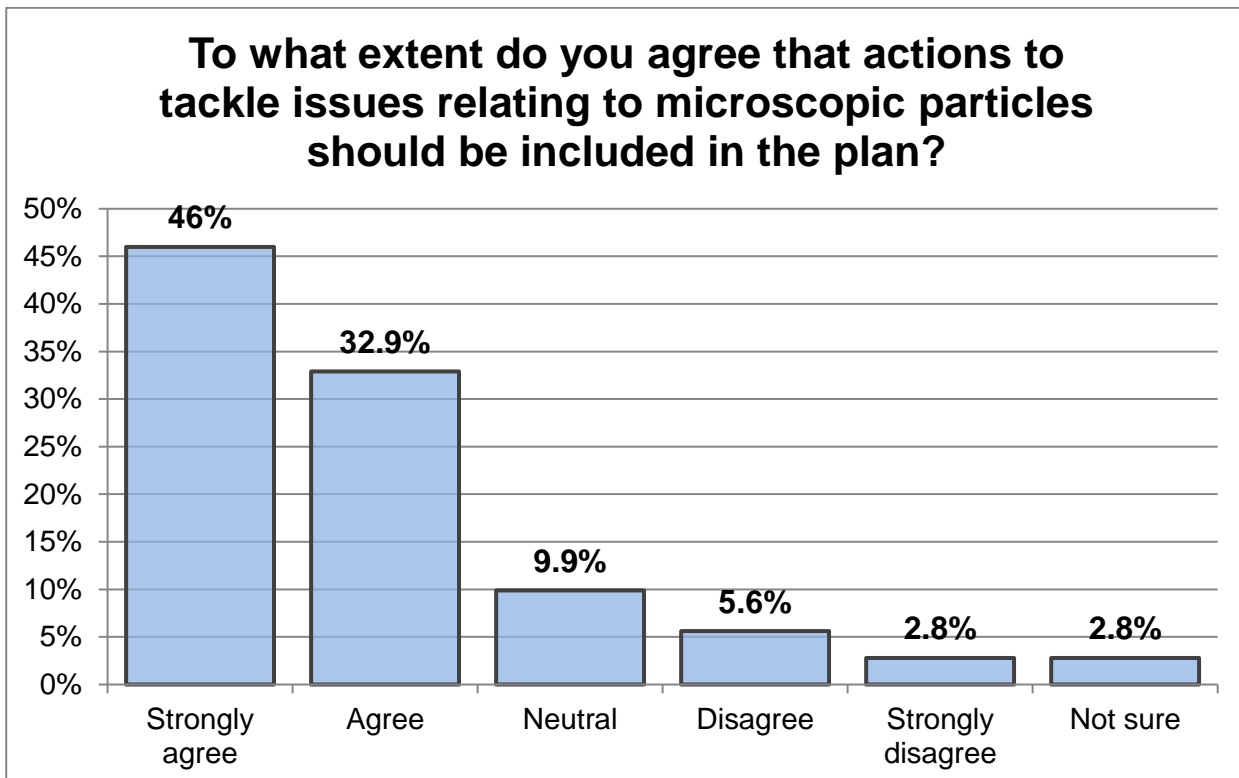
The majority of people **agreed** or **strongly agreed** with the idea of introducing anti-idling campaigns, as well as the ideas to introduce ebikes and a pilot pool car fleet for council staff use on work-related journeys.

Most people opted for 'neutral' on the proposal relating specifically to Midhurst. It is worth noting that not many respondents told us they lived in this area.

Proposed new actions

The revised plan also includes some new actions to help tackle issues relating to microscopic particles in the air, called particulates. In particular, these actions look to encourage cleaner domestic burning of solid fuels (for example, in open grate and wood-burning stoves). More information on this was included in our FAQs and people were directed to the relevant pages of the plan for more details.

The majority of respondents **strongly agreed** that these types of actions should be included within the plan (**46%** or 98 respondents), and **32.9%** (70) agreed. The full results can be seen in the graph below.



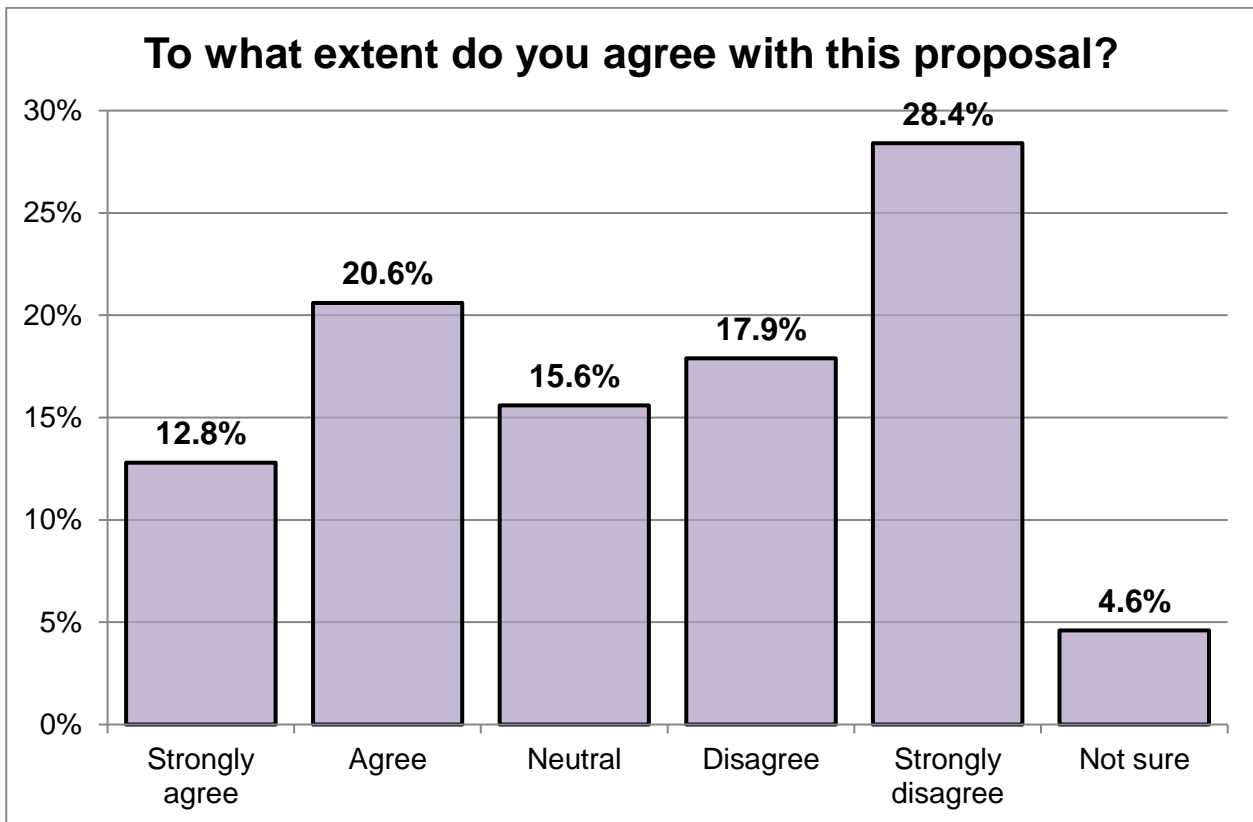
Section Three: Air Quality Management Areas (AQMA)

In our survey, we explained that air quality in the district has steadily improved in the last five years and the modelling predicts that this trend will continue.

Stockbridge A27 and Orchard Street AQMAs

Air quality has improved in Chichester's Stockbridge A27 and Orchard Street AQMAs to such an extent that the draft plan recommends that these AQMAs are 'undeclared' and that the Orchard Street air quality monitoring station is decommissioned (though monitoring will continue using a different method). It is also proposed that the monitoring of ground-level Ozone (O3) at Lodsworth be decommissioned.

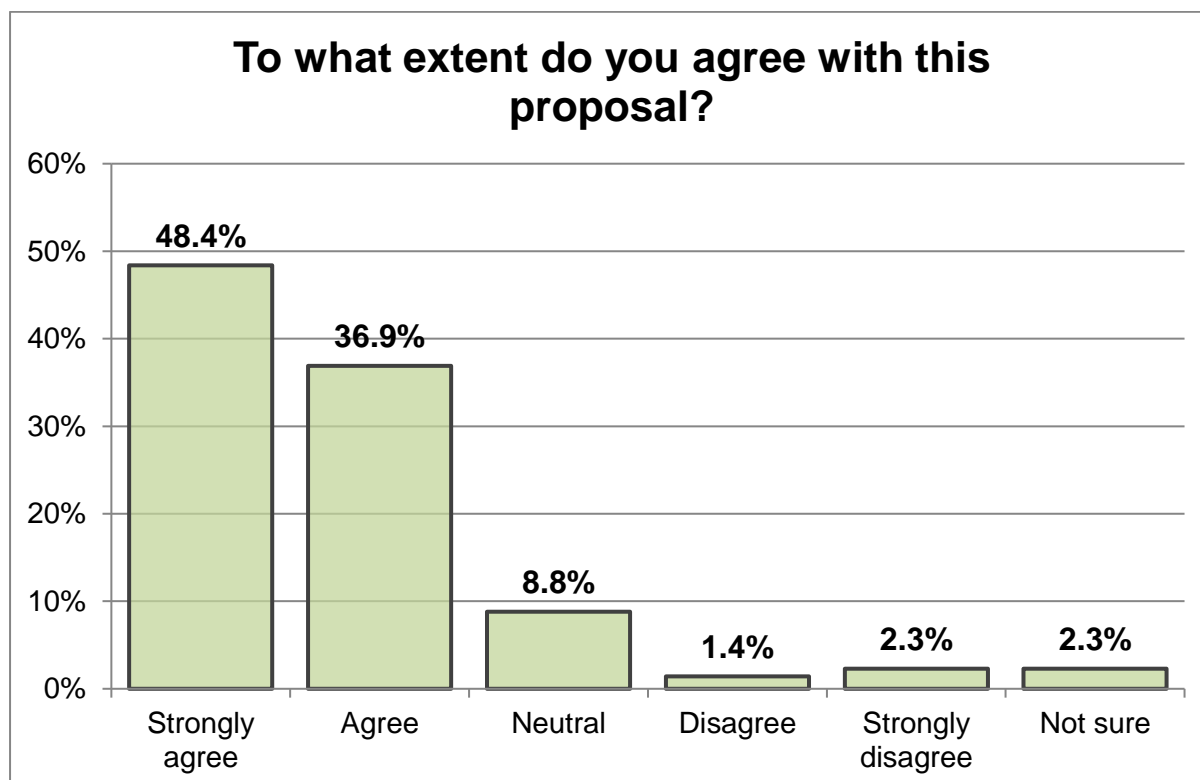
People were directed to more information and modelling reports on our consultation page and in our plan, and were asked whether they felt that based on the evidence, to what extent they agree with this proposal. The majority **strongly disagreed** with this proposal **28.4%** (105) with the remainder of the responses fairly evenly split across the other options. Full results can be seen in the graph below.



St Pancras and Rumbolds Hill AQMAs

It is also proposed that the St Pancras and Rumbolds Hill AQMAs, which are both predicted to be compliant with the UK's Air Quality Standards by 2024, continue to be monitored. Again, to inform people's responses, we signposted respondents to more information and modelling reports on our consultation web page and in our plan.

We then asked respondents to what extent they agree with this proposal. Most respondents **strongly agreed** (48.4% or 105 respondents) or **agreed** (36.9% or 80). The full results can be found in the graph below.



Section Four: Further comments

When asked if people would like to provide further thoughts or suggestions on the plan and its proposals, **161** provided comment.

A full list of comments can be seen in Appendix C. These should all be reviewed and considered by the service area.

Of the survey responses, the main themes of the comments have been highlighted below.

- **34** of the responses specifically **disagreed or were concerned about the proposal to discontinue the AQMAs** proposed in the report.
- **24** cited the **impact of the transport network and road infrastructure**, such as flow of traffic, issues with A17 and buses on air quality. Related to this:
 - **15** comments referred to concerns around the **number and speed of vehicles**, and
 - **4** additional comments referred to increase traffic and congestion around **schools**.

- Around **22** comments suggested **walking or cycling infrastructure improvements or issues** with the current infrastructure
- **21** comments highlighted an area where air pollution is an issue. Some **specific air pollution hotspots** were identified, as follows:

Air pollution hotspot	Count	Air pollution hotspot	Count
The Rolls Royce factory and areas around this, including Stane Street and Westhampnett road, Chichester	8	Traffic in and out of Goodood	1
St Pauls Road, Chichester	3	The area between Whyke and Bognor Road roundabouts	1
The A259 Fishbourne and specifically area around Fishbourne Tesco	3	The Chichester City roads: Spitalfield Lane, New Park Road, Basin road, Quarry Lane	1 mention of each
Needlemakers and the Hornet area, Chichester	3	The area around Central School, Chichester	1
St Pancras, Chichester (it is proposed this AQMA continue to be monitored)	2	The area around Bourne School	1
B2145 Whyke Road between A27 and Langdale Avenue	1	Bosham Broadbridge roundabout to Chidham	1

- Around **15** comments specifically cited a negative **impact of house building and development** on air quality.

Of some of the actions identified in the proposal, or relating to work the council is already doing, there was support for:

- **anti-idling** campaigns (7)
- **car share** schemes (3)
- **tree planting** initiatives (4)
- addressing the issue of **burning unseasoned wood** (1)
- **low traffic neighbourhoods** (1)

Some people raised the **issue of bonfires and burning of waste** (3), which is something the council is addressing within its communications. A couple of people commented that **electric vehicles are too expensive** and that the benefit of investing in these would not be seen (2). The **impact of agriculture** was also commented on (1)

There were lots of ideas put forward to help tackle air quality, and these can all be read in Appendix C. Some included:

- **incentives to encourage active transport or electric vehicles** (6), for example increasing the cost of car parking or implementing more parking restrictions

- increasing electric vehicle (5) and e-bike **charging points** (1)
- **park and ride** scheme (2)
- a campaign to educate and **encourage motorists and cyclists to share the road** (1)
- **electric or green buses** (1)
- **encouraging businesses away from diesel vehicles** (1)

Conclusions

- The majority of respondents (198) were district residents, with 44% living in Chichester City. The most responses came from those aged between 65 and older (37.7%) and there were slightly more male respondents (49.3%) than female (44.2%)
- Responses were received from a range of different groups as well, including parish councils, businesses and community groups, some of which told us that their response represented a number of people.
- The majority of those that engaged with the survey told us they were 'extremely concerned' (45.4%) about air quality in the district. 25.2% (55) said they were 'very concerned'; 23.4% (51) said they were 'somewhat concerned'; and 6% (13) said they were not concerned at all.
- There was a good awareness of the schemes that have been introduced as a result of previous iterations of the plan. The top initiatives people knew about were: the introduction of electric vehicle charging points in council owned car parks across the district (150 responses); the development of the Chichester City Local Cycling and Walking Infrastructure Plan (126); and the Co-Wheels car club (120).
- Respondents were asked to what extent they thought that continuing with a variety of actions could improve air quality in the district. The majority of respondents either **agreed** or **strongly agreed** with continuing the suggested actions.
- Respondents were then asked to what extent they agreed that a range of actions should be included in the plan if funding can be secured. The majority of people **agreed** or **strongly agreed** with the idea of introducing anti-idling campaigns, as well as the ideas to introduce ebikes and a pilot pool car fleet for council staff use on work-related journeys.
- The majority of respondents **strongly agreed** that new actions to help tackle issues relating to microscopic particles in the air should be included within the plan (46%).
- The majority **strongly disagreed** with the proposal to remove the Stockbridge A27 and Orchard Street AQMAs (28.4%) with the remainder of the responses fairly evenly split across the other options. Full results can be seen in the graph below.

- We then asked respondents to what extent they agree with the proposal to continue monitoring AQMAs at St Pancras and Rumbolds Hill, most respondents **strongly agreed (48.4%)** or **agreed (36.9%)**
- **161** respondents provided further comments at the end of the survey — all the comments can be seen in Appendix C, and these should all be reviewed and considered by the service area.
- Initial assessment of these comments highlighted some key themes, including: concerns about removing the AQMA designations, as proposed in the plan; the impact of the transport network and road infrastructure on air quality in the area; suggestions for, or issues around, cycling and walking infrastructure; some air pollution hotspots; and concerns around the impact of development on air quality. There were also a range of suggested measures to help improve air quality, and some of these are included in the report analysis as examples.

Appendix A – Social Media Reach

Social media campaign results:

- **131** total clicks (112 on Facebook and 19 on Twitter)
- **51,597** total reach (36,979 on Twitter; 11,733 on Facebook; 2,885 on Nextdoor)

- 32 retweets / shares on Facebook and Twitter
- Positive engagement rate of 6.2% on Facebook and Twitter

26% of households in the Chichester District are on Nextdoor. This is a very high engagement figure– most authorities can only reach around 5% of their population.

Tweet

 **Chichester District Council** @ChichesterDC · May 14

Chichester District Council is updating its revised Air Quality Action Plan and is asking for people to share their views in a new public consultation running from Monday 17 May until 28 June 2021.

Read more at: orlo.uk/latestnews_CIO...



The graphic features the Chichester District Council logo and the text: "Have your say on how we can continue to improve air quality in the district". It includes the website "www.chichester.gov.uk/letstalkairquality" and the dates "between 17 May and 28 June 2021". The illustration shows a red car with a "Car Share Scheme" logo, a person on a bicycle, a person pushing a stroller, a person walking a dog, and a person sitting on a bench. A "Let's talk Air Quality" logo is also present.

1 retweet, 1 like



Chichester District Council

Published by Orlo · 25 May ·



Are you concerned about air quality?

There are many factors that contribute to the quality of the air we breathe, but as a council we are committed to doing all that we reasonably can to make our area a cleaner, safer and healthier place to live, work and visit.

We are fortunate that air quality in our area is generally very good, however there are a small number of places that are adversely affected by air pollution and we are working to help tackle this issue through a number of schemes and projects associated with our Air Quality Action Plan.

We're keen to hear your thoughts on our revised plan, which sets out a range of ways in which we propose to help continue improving air quality in the district.

You can have your say on the plan and its proposals by visiting: http://orlo.uk/letstalkairquality_qdXWC and completing our survey before midnight on 28 June.

Don't forget that if you or someone you know need a paper copy of the survey, you can request this by emailing us at: letstalk@chichester.gov.uk



awareness about air pollution and provide information everyone. You can find out more about this at

www.chichester.gov.uk/letstalkairquality. Here's James from our Environmental Protection team with more information on how you can get involved.



Chichester District Council

Published by Orlo · 8 June at 12:00 ·



Do you have questions about our 'Let's Talk: Air Quality' consultation?

We have created a range of Frequently Asked Questions to give you as much background information as possible.

The FAQs include: What is an Air Quality Action Plan? How does the council intend to fund the air quality actions? As well as air quality monitoring data and modelling reports that have informed the proposals in the plan.

You can find these, along with a link to take part in the survey, at http://orlo.uk/letstalkairquality_ndAn1 See less



'Let's Talk: Air Quality' – and we're keen to hear your views at

www.chichester.gov.uk/letstalkairquality. Here's James from our Environmental Protection team with more information on how you can get involved.

Appendix B – Consultation promotion

- As part of this consultation, we worked closely with a range of different groups to engage with as many people as possible.
- Local partners and organisations (such as, parish councils, hospitals, Sussex Police's Neighbourhood Watch etc.) were contacted and asked to support promotion of the consultation.
- The University of Chichester sent information about the consultation to Student Union members, posted our messages on their student Facebook groups and issued information to their staff through a staff e-newsletter.
- A media release was sent out promoting the consultation and another to remind people of the deadline.
- The consultation was also promoted within the Leader's column, District Dispatch, in the Chichester Observer and the Midhurst and Petworth Observer.
- The consultation was promoted in the council's general email newsletter, business email newsletter, for the area, and in WSCC's Your Voice consultation newsletter.
- WSCC also promoted the consultation on their Consultations Hub web page.
- Members were provided with posters and link to the consultation page for promotion in their areas.
- A digital screen advert was displayed in the reception at The Novium Museum.
- An email was sent to **775** Let's Talk Panel members.
- The consultation was promoted on social media – see Appendix A for a full breakdown.
- A campaign banner promoting the consultation was displayed on the homepage of the council website. An advertising banner was also displayed at the top of every web page. This was viewed **27,418** times.
- The survey was sent to all CDC staff and placed on the intranet and Workplace. A desktop advert was also created and displayed as background on staff laptops.

Appendix C – Consultation comments

Look at the A27... Needs less cars, more (or at least some!) cycles
I disagree with discontinuing monitoring at Stockbridge roundabout: the air quality here is chokingly bad for both cyclists and walkers along the north and south stretches of Stockbridge road. I can taste the car/goods vehicle fumes when I walk into town. In my opinion air quality is still a major issue in this location.
The council also needs to consider other forms of pollution, particularly the candle factory in Quarry Lane, which has equally harmful toxic chemical emissions. Not enough is being done to stop their emissions from reaching as far away as the Cattle Market carpark and further, on some days.
Far too many drivers in Chichester drive too fast (often >30mph in 20mph residential zones) and are often "racing to queue" and then slamming brakes on and leaving their engine idling. So many cars idle by the level crossings in Chichester. I think there should be education on this and the Police need to have powers to stop this speeding and idling! These driver behaviours deter pedestrians and cyclists and are a risk to their health and well-being.
Improve and extend a good cycle path to the Witterings. The current path is hardly being used, often cyclists on the road as it is in bad shape. It would help the enormous amount of traffic on the A27 and towards the Witterings in the summer if more people would cycle. Make parking more expensive but make an exception for working staff. Educate both cyclists AND drivers how to share a road. I am Dutch so used to cycling and often see both drivers and cyclists not understanding how to share the road. Chichester is a perfect city to cycle to but it should be made safer and clearer. Also make a safe place to park your bicycle in the city? Fishbourne roundabout is a nightmare. More people are using Salt Hill road now. Not telling you anything new I'm sure but it's extremely dangerous and far too busy.
Burning of waste around the area needs to be addressed. There are bonfires being lit emitting foul smelling odours and black smoke into the air, goodness knows what particulates are in that! It is well known that many of these fires are lit on the gypsy sites east of Westbourne. Nothing ever seems to be done about this. The increased difficulty in taking waste to the local tips is encouraging people to burn their waste in their gardens or fly tipping. I think this is an area that really needs addressing.
Fleet of electric or other green energy bus fleet that are council run on a subs basis . any one within two miles of central Chi not allowed to park in central Chichester in ICE car. All home delivery companies to only be allowed to work in area with EV only. No DERV vehicle allowed in central Chi near to schools No drop off to schools allowed unless there is GREAT need.
There seems to be a considerable increase in the use of log burners. Un seasoned Wood is being used and spring autumn and winter evenings all you can smell and see is wood smoke. There needs to be much more focus on this form of pollution.
I really believe that more needs to be done to improve air quality in Chichester, especially on St Pancras as it's used by so many people. To many roads are used as through roads, speeding and poor driving is an issue. There is almost nothing to encourage better and more efficient driving. Noise pollution is also a massive issue on St Pancras.
Monitor the air quality around schools. We live near Bourne school and far too many people collect their children directly from the school in their cars, and also many sit outside idling. This is not good for the health of the children and ourselves, and I've got concerns about growing fruit and veg around this sort of air quality.
I am concerned about the air quality in the derestricted zone between Bosham Broadbridge roundabout and Chidham. The traffic increases speed when travelling between these locations and the diesel fumes can be absolutely dreadful. What are you doing about this type of area outside of central chichester?

Don't forget that the last 15 months will have given a false reading, as more people have been staying at home. It is completely premature to stop any monitoring of air quality in the Stockbridge area or around the A27. As soon as the 'working from home' pandemic rules are relaxed the levels will return to unacceptable.

My one comment is that since the opening of the free school in Chichester it has created traffic James a long way back up Whyke Road and wonder if this has been considered. Also since the new creation of a Primary school in Rumbolds Close this will create more traffic at school opening and closing times in Whyke Road too as there will be more parents trying to park and/or leaving their engines running whilst picking up.

It is stated in your explanations that air quality has improved in the district, and continues to do so. As people replace higher polluting vehicles with less polluting alternatives due to taxation and peer/societal pressures, then air quality will continue to improve at a faster rate still. Measuring this rate of improvement is important, as no measurements permit no analysis. I strongly disagree with any proposal to replace the council vehicles with electric alternatives, these are far too expensive at the moment, and the marginal benefits to air quality that they will bring is far outweighed by the cost to the Council Taxpayer. Economies of scale will eventually bring down prices of e-vehicles, and those coming to the market will undoubtedly become more efficient, and hence cheaper to purchase. At the moment the difference is a minimum of £10,000 between an electric car and a petrol alternative, this additional cost cannot be justified. The only alternative that could permit any electric vehicles would be that all purchases are to be made with no increase in overall budget costs. ie that less electric vehicles are purchased than the petrol equivalent to balance the budget. The few council owned cars will make NO tangible impact on air quality in the area given the hundreds of thousands of petrol and diesel cars and heavy diesel lorries already being used. I suggest that someone actually undertakes a costing plan of the options, either to replace or not, this study, if performed accurately with no fiddle factors included it can then used to justify a e-vehicle non purchase stance by Chichester district. Introduction of e-vehicles is a virtue signalling token which I suggest is designed to show off to other councils and overzealous pressure groups. Most taxpayers would prefer a pragmatic, practical, budgetary aware non woke strategy. Times are tough, post Covid, now is not the time to waste money on token initiatives. Also, overzealous increases in bike lanes in Chichester that cause traffic jams create more pollution than anything else. Bike lanes are good, but need to be linked to usage, a few people using a bike lane is not more important than hundreds of vehicles idling in traffic jams around Chichester centre in reduced carriageways. **DO NOT ALLOW ESCOOTERS IN CHICHESTER**, they are not a practical alternative to the car at the level of a small city, they just are dangerous to children, animals and the elderly who are not aware enough to manage the speed within a pedestrian zone. People do not use them as alternatives to cars, but as dangerous playthings. People should be encouraged to walk and cycle only (yes ebikes are good, but ONLY if used on the road, not in pedestrian areas or pavements).

Pleased you are looking into this. But you need to communicate better what you are doing and where. There is a need for more EV and the associated charging points. I've not seen many in CDC car parks and no initiatives for homeowners or estates. I am chairman of Bishopsgate Walk estate and we would love to consider ways of adding EV charging points and need advice and possibly grants etc to achieve this. It is an admirable idea to move the council vehicles to EV but their number is a small proportion of the vehicles in the district.

Every working day Stane Street in Westhampnett is subjected to high levels of pollution from the stationary traffic queuing from the Park Hotel roundabout to the entrance to Rolls Royce and, in the opposite direction, along Roman Road. Your council has granted permission for the expansion of this factory from about 560 employees to over 2100. This unacceptable and avoidable pollution is being caused by the poor access and egress to and from the Rolls Royce staff carpark. What measures will you take to monitor this daily pollution and how will you eradicate this daily nuisance of gridlock in Westhampnett that is being allowed to occur because the Rolls Royce "Green Travel Plan" that your council approved is clearly not fit for purpose. The Ward Councillor has admitted to the Parish Council that he is fully aware of the problem but nothing has been done. Local residents have asked Rolls Royce to set up a 2nd park & ride scheme, in addition to the the underused Bognor scheme, using Goodwood airfield, this measure has been used successfully in past. Why isn't your council acting to protect the residents of Westhampnett from this pollution and what will you do to stop it?

<p>The addition of another Monitoring site would be very helpful - that is from Chichester Park Hotel to Maudlin along Stane Street. The long stationary queues Mon-Fri at Rolls Royce Shift start in the early morning and change in the afternoon are appalling, and last for at least 20 minutes each time. This must be leading to increased air pollution as the engines are idling / going slowly.</p>
<p>You need to blanket the city with pArking restrictions - like 2 hr no return or permits between certain hours, stop leaving roads exempt from CPZs as it helps you guys out with free all day parking! make cars drive to large car parks and not driving around residents road trying to find free parking. It wouldn't happen in other cities! I don't think encouraging more cars or electric cars is the right way to go, the cycle and walking infrastructure needs modernisation and people need to be more aware of distance (it's 500m to walk from the multi-storey car park to the cross / or less than 3min walk!) E scooters need to be passed through parliament, this would be a great way to making greener transport changes.</p>
<p>Look ahead and redesign the roads in/ around Chichester to prevent queues through the town centre. Eg. Hold ups at the railway crossings and slow traffic along Market way, onwards to Bognor/ Selsey roads. Encourage and make easier a proper Ring road (A27) to keep traffic moving around the City. More sensibly would be a northern route to keep long-distance traffic moving and this could also have a slip road off to Goodwood events. This would avoid gridlock in Chichester. Many trees could be planted in that area to improve air quality.</p>
<p>Whatever decisions are made, on no account should roads be narrowed to 'squeeze' cars in favour of cycles. The appalling experiment of ' Covid cycle lanes' caused a noticeable and uncomfortable deterioration in air quality right outside my house, as more cars idled waiting for access to a roundabout.. do not replicate this disaster. Cycle routes should be carefully managed, and places where cycles are not allowed should be more rigorously monitored : Jubilee Park is being destroyed by informal and unscripted cycle routes. The trees will start dying soon. A lot of your proposals are very ' inward looking' , regarding CDC use of sharing, e vehicle security etc. What about the community.</p>
<p>I live in the Stockbridge/A27 area and i can tell you that the air quality in this area has definitely not improved. Traffic levels on Stockbridge Road are now greater than pre-Covid levels. There has been a dramatic increase in housebuilding in the area and applications for planning permission indicate that there are many more houses to be built. What measures are being taken to ensure that more housing has a limited adverse effect on air quality in the area? Car share initiatives are an excellent idea for traffic reduction, but for these to be effective, they should be controlled from a central ocation or database that is easily available to all interested parties. Such initiatives should be widely publicised to attract a significant number of users.</p>
<p>Cycle and walking routes are good, but should be separate rather than shared space, since many older people and those with pushchairs, cannot get out of the way quickly enough. Cycles need to keep to a speed limit and also give advance warning when pedestrians are around. More needs to be done for the elderly who cannot walk any distance or at speed.</p>
<p>Stockbridge Road heading towards Witterings can be blocked while delivery lorries or builders/works vehicles are parked outside private properties, blocking traffic coming off the A27, which in turn blocks traffic coming onto the roundabout from all directions, which is not only dangerous but raises the fumes given off by vehicles standing and not able to move. Could those properties that have access from Queens Avenue have deliveries etc be made from that road. Over a year it could help to reduce the fumes that locals have to endure. Also there does not appear to be any mention of planting trees in significant numbers, which are being looked at by local parishes and other organisations. Planting trees should be a matter of priority to ensure that the local community benefits over years to come. Not only do trees help control carbon dioxide but help to keep things cool. Pay and Display car parks should be available all the time, not just at Christmas</p>

This concerns the south of Chichester City - The air quality at Stockbridge roundabout (A286/A27) I understand has only ever measured nitrous gases and never particulates. To discontinue monitoring air quality means CDC would be ignoring the polluting effect of particulates. Particulates will continue to be produced from vehicle tyre wear and the tyre/road surface interface regardless of whether vehicles are petrol, diesel or electric driven. Engine idling enforcement needs to happen at the Stockbridge Road and Basin Road railway level crossings. Drivers ignore the 'no idling' signage, giving no thought to the residents of the retirement flats living very close by, especially if they have opened their windows for 'fresh air' during better weather. Although new cars automatically switch off rather than idle, the vast majority of vehicles waiting and idling at the level crossings are non-electric, and many, many are diesel.

You should say what GIS is. Not everyone is familiar with this shorthand

The approach to air quality does somewhat miss out on the impact of the A27. The proposed initiatives, though positive, will not have as big an impact as addressing A27 congestion. In terms of encouraging cycling, more efforts need to be made to provide joined up and well signed safe routes. Both cycling and walking need to have better infrastructure for crossing major roads - particularly near schools, at the canal road crossings and along the A27.

The dichotomy for central Chichester is that if you want people to shop in the central area, then it needs to be easy to transfer shopping to the shoppers vehicle easily and in proximity to the shops you want them to use. Current arrangements make that difficult. How about charging points in limited stay areas in the city centre- adjacent to the pedestrian areas. Alternatively an easy access (ramp to footpath to make use of shopping trolleys easy) and frequent (reliably every 5 mins during shopping hours) electric bus service linking the outer car parks to the city centre. The area within the ring road could then be resident and local business/ delivery parking only. This would reduce traffic in the centre and stop any queues for in city parking areas.

It was a backward step removing the covid cycle lanes. Why are more houses being built without the required infrastructure to stop people using cars?

At the primary schools in both West Dean and Singleton, where I live, a huge number of the pupils are driven there by their parents. These additions are obviously welcome to what might otherwise be dwindling and sometimes unsustainable numbers in rural schools, and likewise these locations offer a good, if not outstanding education, in an idyllic setting in the South Downs National Park. However, the impact on air quality that all these individual journeys perhaps needs to be taken into consideration and more initiatives put in place to encourage car sharing, an extension to the school bus which collects and drops off children living in East Dean or subsidised use of the No 60 bus.

Add a monitoring area for B2145 Whyke Road between A27 and Langdale Avenue

Aircraft pollution from cars and aircraft in and out of Goodwood. Avoid neighbouring roads.

Bike racks should be good quality U racks, that allow the use of secure U locks, not the style that only allows the front wheel to be locked. Additionally e-bike charging points should be considered.

Any data gathered during the first lockdown should be discounted from any trends / statistics / predictions due to the unprecedented nature of the forced changes in behaviour

There has to be a way of making safe for people to be able to walk and cycle around the city. Also parking is an issue for people travelling into Chichester for work - particularly at the hospital where many are not able to come by public transport due to the shifts they do.

More leadership , no buses in town city walls area , pedestrianise south street , west street, electric hydrogen buses, people , bike , car hierarchy within city walls, park and ride , new electric local transport system , final mile electric delivery hub , holistic approach to all local development issues , they are all interconnected , More inventive interactions , green streets , remove large areas of hard paving , e bike delivery systems ,etc etc I could go on

It makes a lot of sense, especially if it raises public awareness of the harm caused by traffic fumes etc.

I am most conscious of lower air quality when close to petrol stations. Although these are needed, the switch to electric cars should ensure the air quality improves in the vicinity of petrol stations.

I am curious as to why modelling of future emissions has not factored in the impact of excessive housing development around Chichester and the consequent increase in road traffic, congestion and as a consequence air pollution? Clearly this is the biggest threat to our districts plans to improve air quality. There is also no conversation about improving the flow of traffic from the Manhood Peninsula into Chichester (despite permission being given to ever greater numbers of housing developments) or improving cycle access from the Witterings to Chichester (which still dangerously relies on the main road). Why isn't air quality being used as an argument to further debate the Chichester bypass on the A27? This issue raises once again the balance that has to be gained between meeting government targets on housing and meeting the infrastructure demands.

Stockbridge should still be included and monitored for air quality. The amount of particles that come from all the traffic coming up or idling in at the Stockbridge roundabout on the A27 cannot have gone down, it's ridiculous to suggest it has. The traffic congestion is the same and always will be unless something is done to sort out through traffic travelling from East to West and viz a viz.

So far so good - it's noticeable that air quality has improved. Can you add additional lighting from the University down to town, please, to encourage more walking down College Lane and into the city centre.

Stane Street in Westhampnett should have the air quality assessed as 1000's of cars at shift change over cause very poor air quality and environment for residents as the cars either speed through the village when leaving Rolls Royce or sit idling in long queues to enter the site along Stane Street in long tailbacks.. HGV's travelling to the site every 5 mins enter the Rolls Royce site twice a day causing air pollution too.

Keep the monitoring facility at the Stockbridge roundabout. Monitoring should continue until peak summer months when there is high traffic volumes to and from the Manhood Peninsular - when traffic delays will be inevitable. It is far too soon to undeclare the AQMA at the Stockbridge roundabout.

The Long delays caused by the level crossing gates staying down for long periods must be addressed, as must the A27 traffic use (we need the northern bypass built in a manner to keep emissions low

Pressure to implement a Northern By Pass for Chichester

I believe that air quality monitoring is very important and the Whyke roundabout and Bognor Road roundabouts should also be monitored as traffic regularly queues here!

I live in Orchard Street and cycle around Chichester, I do not own a car. I have not noticed any significant improvement in traffic congestion in Orchard Street, this concerns me. Your plan mentions cycling and walking improvements in Chichester, but I have not noticed anything significant. This concerns me. Your plan mentions a car fleet pool for council workers, I would only support this if all the cars are electric. There is little mention of public transport in your plan. In order to improve air quality, we need to reduce travel in private cars and encourage use of clean, green public transport, as well as walking and cycling which are not practical for all journeys. Buses need to be electric, cheaper and more frequent, the same applies to trains. What about the introduction of electric trams for some routes? The recent banning of cycling in the pedestrian precinct on Sundays does not help encourage cycling and could result in more people using their cars instead, thus worsening air quality.

Air monitoring should be increased and not decommissioned at any site as new housing is continually being built which will increase traffic emissions. The local plan should prioritise housing locations close to railway access and less than 5 miles to the city or major employment/training hubs. Reduction of local car journeys should be prioritised in planning. The status of East Wittering and Bracklesham as a settlement hub should be reduced to a service village as it has no train access, an unreliable bus service due to road congestion, one road in and out, is positioned at the end of a cul de sac, has very few employment opportunities (400 lost in recent years) and no schooling or training above the age of 11. Any proposed changes to the A27 should avoid local traffic being forced onto small roads such as roads going through villages, the countryside and the city. Introducing no right hand turns on the A27 together with the proposed link road to the congested A286 will cause more rat running through the district which will further discourage the use of cycling as a means of travel. HE should be encouraged to produce a fully functioning long term A27 scheme that will allow a truly groundbreaking local sustainable transport revolution in Chichester district. We have an incredible opportunity here to lead the way with vision and political will. See the Systra build a better A27 and use the model to make bikes and e-electric cars the primary mode of local transport on the flat coastal plain. Incentivise use of electric vehicles. Create a Green Lane model on the Manhood Peninsula. This is a perfect location for introducing cycle/horse riding safe roads similar to schemes that have been pioneered in Norfolk and the Isle of Wight. The peninsula is at the end of the road and not on route to anywhere, it is flat, has the driest weather in the U.K., it has a series of small, relatively quiet local roads cross crossing the peninsula that could be converted to Green Lanes. Cycling is already a popular tourism draw for staycations in the area and such a scheme would further encourage this growing sector of the economy. There are plenty of horse owners and riding stables on the peninsula sea and this could also contribute to the peninsula's booming outdoor activity/green tourism sector. These initiatives will also tie in with the efforts by local communities in the peninsula to create an economy and an environment that will make them more resilient to climate change. CDC has the opportunity to create a visionary, pioneering, groundbreaking sustainable transport strategy that befits its position as a coastal council which is on the frontline of climate change.

Air Quality Monitoring on known busy routes MUST be implemented. Prime examples A286 The Birdham Straight and B2179 leading to Wittering Beach. Lowering the speed limit on these particular routes will cut air pollution, as well as prevent accidents. Plant more indigenous roadside hedging along busy routes to provide carbon/pollution sinks. Make hedge and tree planting a planning condition whenever possible. Larger developments should make a more substantial contribution to landscape schemes, even in separate locations where landscaping is required. ALL incineration must be more strictly controlled. Household wood burners can only use seasoned timber, garden bonfires should be more limited, businesses should not be permitted to burn anything which can be recycled, at all, and burning any treated timber waste or product should either be banned completely or so strictly controlled and monitored that it discourages any use of incineration.

You are allowing far too many developments on Green land and the houses built are not fit for purpose, being built on flood plains and with poor build quality / infrastructure problems (drainage etc). Far too many houses are built with inadequate car parking spaces per dwelling, building smaller / extended pockets , developments also causes excessive issues with poor air quality due to the amount of traffic now on the roads. Parking becomes a serious issue - with vehicles parked over paths and walkway's restricting access, awaiting a serious accident to occur because of this! This is highlighted in numerous areas across Chi - specific examples being the Witterings area (especially EW/BB), which already has excessive traffic in the summer months and now you are allowing faceless developments builds - which are getting built after numerous appeals by unscrupulous developers - with council assistance !! The amount of traffic with carbon emissions etc these generate is frightening. Majority of new developments are purchased by people from outside the area who apart from pricing our younger generations out do not care about out infrastructure and history. People want to have nice walks in fresh air without having to negotiate the now chaotic roads and looking at concreated environments that are no more - animal loss of habitats also being critical now. You as a council do not appear to care - only blaming 'what is directed by the government' instead of listening what the local people already living here want and how to help them. Another survey isn't going to do anything, we need actions to increase living standards - and not by building everywhere with more vehicular access.

As I understand it the air quality check at Stockbridge was taken during the pandemic. It is therefore not a true picture!
No, thank You it's fine .
The councils approach to cycling is COMPLETELY WRONG. Cycling is a fantastic tool to combat climate change. But the reason people don't cycle, is because they don't want to cycle. Wasting money on cycle lanes no one is going to use is the wrong move, and is going to get people angry at you. Remember the covid cycle lanes? The ones everyone hated and complained about? In the time they were up I saw them being use 3 times. What you need to do is incentivise cycling. Set up a system where people either get money, or reduce their council tax if they cycle. I would suggest starting this scheme in a small area, and see how well it works. Because trust me, not many people care about climate change, but most people care about money. Also, if there is a program that could be implemented that incentivises business to use locally grown produce/materials, that would contribute a lot to removing the need for trucks/lorries/vans coming in to chichester, or at least would reduce it. Revamp our busses, cheaper and more of them, plus make them carbon neutral if possible. I rememt Sarah sharp talking about this issue and hopefully chichester can come together to get this done. Last point, I'm not 100% sure if this affects our farms or not, but I would advise you all to watch kiss the ground. It's about climate change and the power that farmers have to aid in this process. As well as the damage that tilling has to our dirt. So maybe a ban on tilling/incentives/educational courses on the methods seen in this documentary to make sure farmers contribute to us fighting climate change, instead of adding to the problem. I would like to know what the response is to the points I raised, and I would like to suggest there is a recorded meeting discussing all of the submissions to this survey, if there isn't already one scheduled. I want to know that I'm not wasting my time trying to suggesting things to the council, and that my voice is actually heard. My email is baileymanoogian@msn.com if you have further questions/updates to the recorded meeting. Thanks.
A traffic light phasing review might help reduce some air quality issues in certain areas as well. Even if compliant, we should aim to keep reducing harmful particles in the air. Just because we have reached the target level, doesn't mean we should stop.
I applaud your work to ensure staff (and work-related travel) for the District Council be as green/ good for air quality as possible. Is there a way of rolling out the example to other major employers in the area in a carrot and stick way? eg signing up to best practice badge with specific requirements to be met to earn that badge?
The volume of traffic through and around Chichester is far too high. The biggest thing the council could do to improve air quality is to end the endless house building which has decimated the local area in recent years. Further more it seems ridiculous that South Street hasn't been pedestrianised yet. I would further more look to move the taxi rank at the station to the south side only, more needs to be done to create a safer space for pedestrians to access the station, rather than walking out in to a pool of ideling car exhausts. Chichester is perfectly designed to be car free, the council should run with it and promote Chichester as a car free city They should also look to build an integrated cycle network across the district to ensure wherever you are in the district you can cycle safely. Chichester should be pedestrian first - cars last
Stane Street in Westhampnett is subjected to high levels of pollution from the stationary traffic queuing from the Park Hotel roundabout to the entrance to Rolls Royce and, in the opposite direction, along Roman Road. Cars, vans and buses sit in a virtually stationary queue for nearly half an hour, belching out traffic fumes. This pollution is being caused by the poor access and egress to and from the Rolls Royce staff car parks. Rolls Royce has a "Green Travel Plan" but it is clearly not fit for purpose.
Maybe monitor what emissions Rolls Royce pump out. The smell of plastic and paint is a daily occurrence
Do not create more cycle lanes that slow traffic
I would like to see the air quality being monitored in Stane street when the workers at Rolls Royce are arriving and leaving at shift change. There are significant queues of cars waiting to go into the factory and cars leaving, often revving engines and leaving at speed. Also the factory often emits chemical smells possibly to do with spray painting.

What about Westhampnett? There are two big issues: 1. Rolls Royce There is heavy pollution from a daily traffic jam that is caused by Rolls Royce staff queuing up to get into the RR car park (can I send you photos?). Also, you can regularly smell varnish coming from the spraying rooms and a heavy 'burning' smell. It would be great to have reports available to the public showing how much pollution the factory is emitting. 2. Viridor/Household Waste Recycling Site 2a. Recently, a parking/waiting area was installed on Stane Street where all the waste vehicles are parked. This has been placed opposite the entrance to the new homes being built. The black metal railings that have been installed are open to the path and cycle lane where school children walk past, people jog, and cyclists travel. The vehicles that are parked here are reversing into spaces with their exhausts pointing onto the pavement for people to breathe in. It is also unsightly to look at as it's been placed in the middle of a village without much thought for how it looks in a residential setting. It would be great to replace the metal railings with vertical wooden fence panels or even pollution absorbing shrubs, or both. ----- I also wanted to mention the cost of the buses. Westhampnett has a great bus service (no. 55). The bus stops every 30 mins right outside my house but I never use it because it costs more than parking the car in town. My daughter goes to senior school in September but we've decided to drive her there because the child's ticket is too expensive. It would be great if the child's ticket could be subsidised as it's almost the same price as an adult's ticket. On a positive, I wanted to say that the new Westhampnett cycle lane has been a triumph. It's heavily used and a real asset to the village. It's used by Rolls Royce workers but also the children in the area who cycle up to Sainsburys for fun (they don't have much to do around here!) It's also heavily used by parents with prams and also joggers, so thank you! More dedicated cycle lanes would be great, connecting up key areas like schools eg. Westhampnett to the Free School. Thank you.

Barbecue s, garden fires , and fire pits should be strongly discouraged or banned in highly pollution areas eg Orchard St . I suffer from asthma any at times in the summer I cannot sit in my garden for fear of exacerbating the condition.

Living on Orchard Street I am dismayed at the propoal to decommission the air quality monitoring system especially because of all the monitored areas it is the only one with two primary schools directly at the road side. It is also not mentioned in the draft action plan that Chichester's much needed Food bank is also on Orchard Street, at the site of the Family/ Immanuel Church. Traffic idling at peak times when children are walking to attend the schools, or we are walking to reach our daughter's school (when you can smell the fumes in the air); an uprecdented increase in heavy goods vehicles using the street to access sites outside of the city make the road unpleasant at the best of times (sometimes unsafe where pavements are particularly narrow), whilst the Fire and Ambulance service must also use the street to access their calls. Having experienced the noticeable change in air quality during the intial lockdown, and the now seemingly heavier use of the road (and all roads around central Chichester), as a mum with primry age child and knowing that the demographic of the street includes many young families I suggest it's a dereliction of duty by CDC to stop monitoring the air quality on Orchard Street.

I live on Orchard Street, Chichester and routinely find the air quality to be palpably unpleasant, due mainly to the huge amount of HGV, tractors and buses that travel on this completely unsuitable road. In addition to the poor air quality, large sections of the path on this road are barely two feet wide making walking with a dog or pushing a pram not just unpleasant but out and out dangerous.

Orchard Street is still polluted in my opinion. I live there and now lockdown is being lifted the air quality has deteriorated due to more traffic. 30 mile speed limit often ignored, queues at peak tumes, engines idling. Orchard Street is a residential road which, unfortunately, was designated as a ring road to the detriment of its very many residents. To state the obvious "when lockdown was in place for many months, the front of my house stayed almost clean. Now it is covered with black filth again"

You don't need air quality monitors to see the problem: just walk along Orchard Street / The Hornet / St Pancras or any built up area and look at the front doors and window ledges. Everything is filthy because of particulates, and the difference was patently evident during traffic-free lockdown. Removal of monitor stations ignores clear visual evidence and sends out a strong signal that the council believes the problem has been solved and nothing more needs to be done to prove efficacy of future developments and strategies. If you want to improve visitor footfall and share of spend to our already struggling town centre, then it needs to be a beautiful, safe, forward-thinking place to visit - with a clear focus on the major issues facing society today This is not the current message being delivered ...

I live just in South Bank just off Stockbridge Roundabout and have suffered breathing issues for years related to the pollution and particulates from the A27 and also queues down Stockbridge Road. These improved in the pandemic lockdowns but have now gone back to the levels before. I have found no improvement in air quality over the last 5 years and in fact feel it has steadily got worse. Summer queues to the beach means we get no respite at weekends. The particulates pollution mean we are constantly dusting the house clearing away the black sooty particles.

Here in Wisborough Green there seem to be a lot of " wood" burning stoves by the evidence of polluted air by burned material every time there is cold/cool air in High Pressure conditions as from the late afternoon. This smell is not that of dried wood with the bluish /grey smoke that happens in the countryside. The smell is not the smell of autumn but smells polluted. Are people burning the proper fuel? Are the fire starter agents causing the smell? Is it to do the the height of the smoke chimneys for burners where the ground of buildings is not flat so some people get a blast of undiluted smelly air? These smells are enough to cause me to shut any windows and not to go outside. This really angers me as it reduces my choices of transport - won't walk to village functions our to socialise in the late afternoon/early evening. I do have asthma and a heart condition which are affected by pollution. I wish those people creating this smelly air had to experience it in their homes as I do when outside. A couple of years ago I came back from a day in central London by trai, got home by car from the carpark to be shocked on opening the car door to to met with the polluted air. Central London smelled fine but the lovely countryside air in this small village stank. So upsetting. The memory is still strong. I do have a strong suspicion that the height of the stove chimneys and the differential heights of roof lines plus what people choose to burn without smelling what they cause are key points in this needless pollution. I would appreciate a reply.

I strongly disagree with the decision to undeclare the Stockbridge AQM facility. I suffer from asthmatic bronchitis and if I walk into town from Donnington using the footbridge over the A 27 at the Stockbridge roundabout I have difficulty in breathing because of the pollutants from the traffic. Now the summer is approaching the traffic to the Witterings is very heavy and adds significantly to the overall traffic pollution. I find it very difficult to believe that the AQM is recording acceptable levels of pollutants.

It is important to maintain all of the air monitoring sites to demonstrate improvements not just shut them down as we are in a good place, people need to see results and take encouragement from their actions, we need to keep the general public onboard, I could suggest my front door as a monitoring site in the summer when traffic comes to a standstill on the 4 mile queue to Selsey. I support cycle routes, just ordered an e-bike but, the implementation of routes needs more thought and consultation rather than the rush during COVID lockdown. I live in Hunston the road to Selsey/Chichester is dangerous, where is the proposed cycle route? A blanket 40mph speed limit or less on the manhood peninsula would cut total emissions, there is no need for the short stretches to be faster, it saves little time. Too much of the report is spent blowing smoke up the CDC. Don't go through some expensive cost analysis to buy a car, state where practical all council vehicles will be electric end of; cost is an irrelevance it's the statement of intent. You want me to stop burning a log on my fire, you need to sort out council policy first, I don't want to sponsor a car pool or bike pool for council employees. Vehicle pools take managing and will be open to abuse despite good intentions. In sum the report/draft action plan and supporting documents were far too wordy for saying not very much, too much repetition and use of paragraphs and headings to spin out 15 pages to 60, maybe I have spent too many years trying to read long reports. This is a noble cause and I am pleased that the CDC is developing a plan and there is consultation, it's important to avoid a panic in the run up to 2030. More structure with better thought out options will be better in the long run even if that means missing 2030 by a little, I've communicated the same to the SOS.

<p>Please start to monitor areas outside of the centre of Chichester. As you decommission areas that are now compliant, you'd do well to take a view on other areas. For a start may I suggest A259 Fishbourne, I appreciate its hard to fix but let's start with some monitoring and get some actual data. A lot of properties are very close to the road and air quality maybe profoundly affected but at the moment we don't even know if this is the case or how bad it could be. Another area that springs to mind is the queues to West Wittering. A large number of cars idling whilst trying to access parking for the beach. An improvement in the access arrangements could improve air quality for residents along that route. I think new development should at the very least be neutral in regard to air quality but in fact I think they should be pushed to make active improvements for the area, to make up for the detrimental effects of the development process and the build.</p>
<p>SOME OF THE POINTS IN THE ACTION PLAN USE THE PHRASE "WORK TOWARDS". TIMESCALES FOR ACHIEVEMENT OF EACH OF THE POINTS SHOULD BE GIVEN</p>
<p>A safe Selsey to Chichester bike/electric scooter route would be very beneficial to many residents and to the air quality</p>
<p>All progress needs to be continued to be monitored due to the high level of continued building without restriction in the area and thus the extra cars, traffic jams and idling vehicles. Please stop allowing so many new houses to be built without consideration of the infrastructure of roads and the through traffic</p>
<p>The biggest problem is that the public are reluctant to walk or ride due to anti social driving by many. Control of vehicle speeds and viable reliable bus services are essential steps. Enforcement of speed limits is almost non existent apart from headline grabbing very excessive speeders. Joined up off carriageway cycle routes are essential and more shared footways should be implemented.</p>
<p>1) There should be formal action to pass by-laws to make it illegal for all petrol or diesel vehicles to be parked or waiting in the Chichester district with idling engines. 2) There is a clear need for an awareness raising campaign to switch off engines in the District. In addition much more noticeable signs should be placed on street signs at the level crossings in the district and also near schools. 3) For example at the various level crossings in Chichester car and trucks always wait when the level crossing barriers are down but have their engines idling. Often for 3-5 minutes. 4) Council funded taxis often park and wait with their engines idling outside various schools, e.g. on Summersdale Rd to collect children from Fordwater Special School. I have observed this regularly with large minibus taxis with engines running parked for 15-30 minutes. The requirement to switch off engines should be written into these contracts. 5) There are no cycle racks or cycle securing bars at the northern end of North Street, this should be remedied in the close vicinity where Priory Lane / North Walls join North Street. 6) The cycling strategy needs strengthening and practical improvements made to the North Street 'gyratory' at the bottom of Broyle Road. This is a dangerous and bad example of traffic management. Cycling around this is dangerous, cyclists should be given clear right of way around the whole gyratory with clear signage and very clear new road markings to show cyclists have right of way around the whole gyratory, so cars have to stop and give way to cyclists at each junction. 7) Many of the 'cycle lanes' e.g. on Broyle Road are too narrow and the marking faint or erased. Cycle lanes should maintain a constant and minimum width of 1.5 metres, in some areas they are around 70 cm wide and vary.</p>
<p>I witnessed this morning here in east wittering the car park for Tesco and other in the parade it has 2 charge points and had 2 people trying to use them I came back 15 mins later they were still trying to get them working, obviously you have no control over this but my point is that the infrastructure isn't anywhere good enough for the explosion of electric vehicles coming is it ?</p>
<p>You can't fix air quality without first addressing transport. In particular enabling cycling and walking as VIABLE AND PROPERLY SUPPORTED options. Not options that generate conflict with cars as seen recently by the pop-up lanes fiasco. The timing of a cycling scheme is crucial, it should be implemented before summer and not before autumn/winter. The weather can be your friend or your enemy in encouraging cycling and walking.</p>

<p>What actions are being taken to improve traffic flow on the A27 from Tangmere to the west of Chichester -- idling traffic reduces air quality. The Victorians recognised the benefits of planting plane trees in our towns and villages -- what is WSCC/Chichester council doing to follow the lessons of the Victorians? What parking incentives are there for electric vehicles or small vehicles instead of large SUV type vehicles in our towns and villages? Can work be done to improve the safety of the road surface in cycle lanes -- fill potholes, remove drain grilles with horizontal bars that bike tyres can drop down, etc, etc.</p>
<p>Stop building more houses. Sometimes I wonder what sort of idiots work in the councils? Every house you build contributes to the pollution caused by cars. Does not take an intelligent person to work that out. Before you build improve the infrastructure. You people must be thick.</p>
<p>I cannot understand why more housing is being provided adjacent to the A27, not just because of the air pollution but the loud noise pollution from passing traffic, particularly unsilenced motorcycles, cars and HGV's. Many of these vehicles would not be permitted around the Goodwood circuit, so why are they allowed on public roads and why isn't action taken against them? And why allow people (especially social housing residents) to live next to these roads? Don't they deserve decent air and noise quality??</p>
<p>You don't take into account the air quality with your planning regulations. You just don't listen to local people particularly in Fishbourne about the air pollution through the village from the Tesco roundabout onwards on the A259 to Bosham and also through Fishbourne Road behind Tesco. There should be NO MORE HOUSES built until the A27 is sorted out and certainly NO LINK ROAD across the fields from Donnington/Stockbridge to Fishbourne roundabout. It's utter madness. My son has suffered from asthma attacks and now my sister has been diagnosed because of the air quality in this village. Just how many of you CDC planners live in the Bourne villages? Get a grip and LISTEN TO THE PEOPLE WHO EMPLOY YOU!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!</p>
<p>Instead of using legacy technology in the shape of electric vehicles, you should be promoting hydrogen fuel cell powered vehicles. Batteries are incredible damaging to the environment.</p>
<p>Selsey has an Asda store on the edge of town. It is not safe to walk there because there are no pavements on both sides and no safe crossing points for pedestrians. A reliable all year round park and ride scheme for Chichester would help to reduce traffic in the city centre. Cheaper bus fares for young people would make them more independent from relying on lifts from friends and family taking them to and from work or college. On street displays of air quality ratings much like food hygiene ratings may encourage improvements by the communities affected.</p>
<p>Sadly over population is never a consideration in these types of survey. We suffer hugely from over development as well. It's not just cars and busses, we have boilers in every house, aeroplanes, cars with huge engines being raced daily, it seems we have a 'if you pay you can pollute policy. We really need to stop developing farmland. Summer time is worse, the main roads are jam packed with stationary vehicles. Particularly when we hold events like Festival of speed etc. These events alone produce tons of pollution but nobody cares because it brings in money fir the few. We need to stop population growth and stop building houses on green fields. But again, no one listens.</p>
<p>Consider New Developments adding to the quality of air. Developers could take on some of the responsibility by ensuring New House builds have individual drives and electric car charging points. Developers should bare the cost of installing at least 2 car charging bays where they have built new flats. Developers in the planning stage could be prioritised if they build new homes with Solar power for hot water & heating with excess energy returning to the grid. Everyone's a winner especially our planet. Developers should bare the cost of planting shrubs and trees along major roads beside the ugly anti- noise fencing. This would absorb noise pollution but with shrubs in front would absorb air pollution and still encourage wildlife. Tackle pollution on all fronts, help nature fight pollution, every ditch not cleared, every gutter not cleared of weeds adds to pollution it's all part of the cycle. Use Ford prisoners & volunteers to clean up our verges and ditches otherwise they drain pollutants into rivers, then the sea . Our wild birds are eating plastic our sea life is becoming infertile. We need to get the message through to schools at a very young age. They need to know that drooping litter has an effect on their environment and the air they breathe!</p>

<p>There is a much wider geographic influence on good and poor air quality, therefore a full county wide and national approach needs to be implemented to improve underlying air quality.</p>
<p>We need to reduce motor vehicle use, for all sorts of reasons - not just air quality, although that's a big one. We should make Chichester a people-friendly city, like the best European cities are (especially in the Netherlands). Plenty of frequent public transport in the city and to outlying villages, Low Traffic Neighbourhoods, and cycleways everywhere.</p>
<p>Urban planning and traffic planning should be considered together with the objective to increase public transport usage to around half of the overall mileage done by Chichester residents</p>
<p>We welcome the recognition that buses contribute to air pollution. However, stop / start technology is a minor step. - A strong aspiration for zero emissions buses must be endorsed. Key to improving emissions is reducing private vehicle use in the town. - Cycling and walking must be better funded and a walk / bike first access policy will improve air quality, GHG emissions, public health and the comfort of the town centre as we double the population with new development. - Robust and immediate funding for the LCWIP must be sought.</p>
<p>Monitor the air quality at the side of the A27 particularly at peak times and summer.</p>
<p>pointless PC Nonsense</p>
<p>I am extremely concerned about the pollution from stationary traffic queues and volumes of traffic passing by the back of our home at the Stockbridge roundabout. The situation is getting worse year on year with much busier roads and long queues especially in the summer months. Our windows and paintwork is covered in fine black soot which I can only imagine is generated by the traffic. This is a situation that getting worse. I can only assume that we are breathing this black stuff into our lungs. Our back garden is directly exposed to the A27 and I feel increasingly concerned for my respiratory health so no longer feel able to sit in my garden due to this pollution and the noise of queuing traffic.</p>
<p>Overall support. Very familiar with: Midhurst Rumbolds Hill and St Pancras as a pedestrian and a car driver - walking in Rumbolds Hill is very unpleasant. Note with interest that there is no mention of Agricultural vehicles at eg Portfield - perhaps using the A 285 between Petworth and Chichester creates a bias in my view- though to be fair they do not "smoke."</p>
<p>The assessment of improved air quality in the Stockbridge area is sadly misguided. I believe this conclusion to be based on unrealistic time periods and traffic volumes. The air in Stockbridge is heavily polluted whenever traffic volumes are high, that includes peak transit times (every working day), weekends in the spring and summer months and whenever schools are operating. It is imperative that air quality monitoring be continued in Stockbridge, that a Northern bypass be constructed at the earliest possible time, and that parents be strongly encouraged to send their children to and from school using green public transport rather than in polluting private cars.</p>
<p>STOP BUILDING HOUSES EVERYWHERE!!! THIS is the root cause of all the excess traffic and pollution. I live on main road Fishbourne and our windows are black with pollution and constant noise of traffic 24/7. This has only happened since additional housing estates were built along the route ! It is all the new housing developments that are causing the problem- STOP ignoring this and REDUCE building works- the lorry's diggers and building cans as well as additional residents vehicles from these Jew developments are the problem. If Chichester PREVENTS further developments especially in its surrounding green spaces, the pollution will decline. You already know this. Stop ignoring the real issue!</p>
<p>Build a Northern road route.</p>

The main factor contributing to the increase in poor air quality in the district is the increase in housing which the area cannot support, causing an increase in population and, therefore, inevitably, cars. I cannot believe some of the predictions of "improvement" your plan makes, based on this fact. There is very poor infrastructure in the area (you cannot even get to Bognor any more without having to change trains) and inadequate and expensive bus services. Even without improvements in these areas, you will not stop the increase in cars, however much you tinker with bringing in cycle tracks etc and CDC must know this but seem unwilling or unable to stand up to the Government and fight for an immediate moratorium on house building in the area, which is doing very little to support local need but everything to service unsustainable growth and non-local demand. The "improvements" to the current A27 will also not be adequate to improve air quality and will be at a cost of further ruining the environment. By Highways England's own admission, the A27 will only be viable for a few more years before we have the same issue. Where is the support, or at least suggestion, for a northern by-pass in the proposals? How about looking again at the possibility of tunnels under the railway, at least at Stockbridge? Chichester is rapidly becoming a most unpleasant place to live and health issues are likely to increase as a result of increasing poor air quality. I don't believe your proposals will have any major impact on this.

To have credibility, any Action Plan should include factual data from congested roads in the inner city, e.g. St. Pauls Road, Spitalfield Lane, Westhampnett Road, New Park Road. I am concerned that the Modelling Data excludes roads like these which are well known for congestion and slow moving traffic which subsequently affects the air residents are breathing. Do not revoke both AQMAs, extend them and fund additional monitoring tubes in the congested roads previously mentioned. This effort could be funded by delaying expenditure on E-Bikes and EV Pool Cars for Council workers. The air pollution levels are not caused by Councillors going to work in Chichester, so their contribution to air pollution is minimal. There would not be a good return on this investment of tax payers money. The major contribution to air pollution levels is Sat Nav guided traffic through the city due to lack of road infrastructure. This will be further exacerbated by all the additional house building in the area.

Whilst I agree that electric vehicles will improve air quality I am concerned about the disposal of batteries when they reach the end of their useful life. Potentially another environmental issue. Has the Council considered this?

In regards to wood burners and open grates being cleaner, they are not, they cause smog, they also affect people with breathing problems, cause asthma attacks and generally irritate the lungs and they cause more pollution especially when you have more and more people with them. You only need to look back at history to know the problems they can bring. I feel you are totally avoiding a very important issue to make the air quality better we should be looking at more solar panels, wind turbines especially as you want to add more electric vehicles to your fleet and with the push for everyone to get electric vehicles. So I feel you are totally missing some of the most important stumbling blocks needed to actually make a true difference for everyone. Also you can increase the cycling ways and paths even have some cycles in areas so people can use them but you are forgetting totally about disabled people, will you have hand cycles? Will you have trikes? Will you have cycles that an able body person can use with a disabled passenger? Disabled people are always forgotten especially when it comes to cycling, or improvements, especially in and around Chichester

A full document supporting the "bullets" below has been prepared and submitted to CDC/WSCC. This document contains the detail behind my responses. (THIS SURVEY FORM, DESPITE OFFERING AROUND ANOTHER 4686 CHARACTERS DOES NOT ALLOW) # Penny Plant's foreword, and the Executive Summary of the revised AQAP, is narrated in a way that is arguably not informing the public of reality of air pollution in Chichester. Too much spin without a balanced view. # The new actions to, "help tackle issues" relating to particulates falls short of what is needed to get factual data to support modelling. The contribution to the particulate problem from open grate/wood burning should be quantified relative to Fine Particulates emitted from slow moving/stationary traffic in the inner city rat runs and approaches to A27 junctions. # The Phlorum Consultancy Modelling reports are only as relevant as the briefing, scope of work, and assumptions provided by CDC/WSCC. CDC do not have any actual data for fine particulates (the quote from PP.."the invisible killer")to support their modelling and therefore are unable, or unwilling to declare a confidence level of their data. # The Modelling, such as it is, avoids any narrative or facts, in inner city rat runs. Nor does the survey ask a question on this to residents,

Too much traffic on St Pancras and The Hornet. Constant traffic jams. How about one way systems? How about limiting access to Chichester residents only at certain times of the day. How about a Park and Ride system for shoppers and workers?

1. Now is not the right time to determine the AQAP for the next 5 years, for 3 reasons: a) the Environment Bill is currently passing through Parliament and we do not yet know what further responsibilities it will impose on Local Authorities, in particular for the potential measurement of PM 2.5 particulates; b) The AQAP reports the improvements in the data over the 5 recent years, for NO2 emissions, thought to be due to improvements in modern petrol and diesel engines, and from them predicts further reductions. But particulates pollution is if anything worse, and it arises from brakes, tyres and road wear common to all vehicles including electric. c) the traffic modelling used to predict the coming years cannot have taken into account (because unpredictable) the additional traffic that will be diverted through Chichester when the A27 roadworks and delays necessitated by the Local Plan Review take effect over the coming 2-5 years; these will be exacerbated by drivers seeing traffic blocks ahead on their Satnav, and diverting both from the Fishbourne Rd. Roundabout and also along the B2178 from/to Havant. Much of this traffic will use Orchard Street, which should therefore continue to be monitored. 2. Chichester West Ward residents are also concerned about AQ at the bottom of St. Paul's Rd. where there is another canyon effect. St. Paul's Rd. is: a) part of B2178 (see above) and b) the only vehicle access to Chichester for the new development at so-called Minerva Heights, where occupation has already started, for 500 or so houses of the total 750, until the Southern Access is delivered, at an unknown future date. c) also traversed by children from the 6 schools in the area, and children are more at risk than adults. This new AQAP must therefore include new monitoring at the bottom end of St. Paul's Rd., if it is to have credibility in our Ward. New monitoring there would show residents that CDC really is serious about AQ. 3. At The Hornet/ St.Pancras, the data sets consistently show worse pollution in St.Pancras than in The Hornet. However, this is contrary to experience and commonsense, when everyone can see that traffic is often stationary in The Hornet, but moves freely in St. Pancras. This has the effect of undermining the reliability of the data throughout. The report does not explain this. 4. Why is a Low Emission Zone for Chichester not being proposed? 5. The anti-idling campaign proposed is to be welcomed, especially at the Railway Crossings. In fact, why does the AQAP not take the opportunity put its weight behind the contentious Basin Rd. railway underpass, to eliminate these appalling queues and their pollution (regardless of all the other waste from delays)? 6. It is notable that all the initiatives proposed on p.43 are dependent on whether grant moneys are available. If CDC takes Air Quality as a priority why does it not make its own direct investments in Air initiatives? 7. The initiative to get Stagecoach to update their bus fleet is much to be welcomed. As their buses operate under licence, this should be made a condition of the licence, rather than just letting them use up Brighton's cast-off bus fleet in Chichester.

Need to consider park and ride also to keep traffic out of centre. St Pancras is gridlocked cars outside with engines running is terrible for our health

There remains no safe lower human exposure limit/concentration for airborne NO₂ emissions, so the current limits should not be observed as long-term targets or standards. This requires that all existing air quality monitoring stations remain on-line so that measurements will still be available to compare against future reductions in minimum air quality limits. Modelling of data appears to take no account of the increasing population and housing in the Chichester area, particularly along the East-West-of-City spread of housing developments. Air quality monitoring stations should be built into these conurbations to monitor the shift in vehicle emissions from inner-city to outer urban areas. Stricter vehicle emissions should be expected of all urban business/works vehicles, including waste collection vehicles, postal service and courier vehicles, supermarket delivery fleet vehicles, and "take-away" food delivery scooters. More effort could be made in making it possible for children to walk or cycle to schools with minimal supervision, by making pathways and cycle-routes safer and encouraging walking buses, group car sharing schemes, and dedicated school transport services. There remains a particularly tricky issue for parents who have children with age ranges that span the primary-secondary school age boundary – the school run becomes a lengthy ordeal made in large vehicles during peak traffic hours between the different schools. An inter-school transport scheme, for example, could help to relieve this issue by transferring pupils between schools so that parents only have to pick all their children up from just one school. Occasionally, events at the Goodwood Motor Racing Circuit involving classic and vintage vehicles (particularly motorbikes) result in pungent-smelling exhaust pipe emissions being detectable throughout housing areas downwind of the site. As these older vehicles are not fitted with any exhaust emission reduction apparatus it is extremely likely that the malodorous gases contain extremely high levels of CO, NO_x, VOHCs, and PM(10 & 2.5). An emissions management scheme should be investigated for this particular type of motor circuit event.

I think the heavy relentless traffic along Needlemakers and The Hornet in particular is unacceptable. These are residential areas too and there seems to be no consideration to either residents or pedestrians. I think central Chichester including Needlemakers should be traffic free and the whole area pedestrianised - what a difference that would make for residents and visitors alike. Set up a Park and Ride scheme to West Wittering. End all this polluting noisy traffic coming through Chichester.

It is disappointing that working from home, where possible, for CDC staff, and encouraging other City centre employers to do the same, is not included as a policy. It is clear that working from home during the pandemic has had a significant effect on pollution by reducing travel to and from work. It makes no sense to leave such a positive measure out of the plan.

I note the comments regarding bonfires and wood burning stoves but you have failed to mention the pollution caused by BBQ's. We have an open fire and no central heating so I am annoyed that I am going to have restrictions on what I can use to heat my home but people can still have as many BBQ's as they like when they like. When my neighbours have BBQ's I have to shut my windows as my husband is has asthma. BBQ's can also cause cancer so really needs to be taken into account. I know that this is probably political as it would be unpopular in some places. In London parks it is now such a problem that many people avoid them. BBQ are usually on the hottest days of the year when people really do need to be able to open their windows and also should be able to enjoy the outdoors without having to breathe in the pollution from BBQ's

A high level of tree planting to create barriers along busy roads.

I am puzzled why it is thought that the pollution levels will fall when traffic is increasing particularly in the light of much additional residential development. North Street and Cleveland Road are hardly representative of the area from which to form a judgment. I get an impression of the Council going through the motions and not really engaging with the problem. During the first lock-down the air quality was noticeably better as a result in the reduction in the volume of traffic. If the Council were really committed to green travel they would be installing electric vehicle charging points in far greater numbers.

It truly beggars belief that a survey like this, essentially self congratulating for CDC, offers only one tick box to reflect the disastrous consequences of the "neighbourhood" plans. Traffic is at gridlock throughout the district now and the thousands and thousands of homes for which planning permission has been given will destroy the quality of life we still have left and turn our air into an inner city quagmire.

One of the worst times of air pollution was when a fleet of old buses was used to transport people from the stations to Goodwood. The pollution from these old buses was extreme and made me feel sick. I don't think this should be allowed again. Just because something is old does not excuse or justify that level of pollution.

There is a catastrophic lack of linked up thinking. The traffic from the new developments to the West of Chichester have no apparent traffic plan. Can they seriously expect to use tiny narrow and uniquely beautiful Westgate as their rat run? The air quality will be devastated. I strongly urge further thought on this specific problem and regular meetings motoring from now on to monitor change.

As a resident of St Pancras I am very concerned about air quality. I am anti car idling and think that this should be illegal. My main concern for St Pancras is the speed and acceleration of cars coming around the corner from the Hornet traffic lights. A couple of weeks ago a man crossing the road coming from the Nags Head pub was knocked down. I have not heard of anything in the media about this. I wish it had been publicised to draw attention to the dangers of crossing St Pancras. The noise is incredible sometimes as cars speed along the main bit in front of the Nags Head pub. I am really pleased to have the road sweeper come by most days to clear the grime. I know from the windows that the pollutants from cars causes black dirt and dust. I wonder if people believe driving through the city centre is quicker than the bypass!

This plan analyses measurements taken during a period (2020) of known and significant traffic reduction due to COVID-19. It is therefore wrong to use these figures to make prediction and decision on future AQ levels. 2021 has already seen increases in A27 traffic and commensurate pollution levels. Any action plan should consider pollution levels during 2021 rather than 2020.. I do not support any action until further assessment is considered

We live on Stane Street, Westhampnett. Five days a week, Monday to Friday, between 2.45 and 3.15 there is a queue of virtually stationary traffic, all with their engines running, in both directions approaching the Rolls Royce car park entrance at the shift changeover. This must be a major source of pollution.

* although important cycling and walking initiatives do not reach everyone, however good the links are there will be those who are unable to cycle or walk far. To target the use of cars it is essential that public transport is made accessible, frequent and affordable. This would require working with WSCC. A return bus journey for a family of four from Chidham (4 miles) to Chichester is £20, clearly not affordable and one of the most expensive in the country. Subsidies and investment is vital. * there needs to be a campaign to stop engine idling outside schools,. This can be seen outside most schools every day. Could there be a bye law to make it illegal? 3. There need to be many many more EV charging points. What are the plans for rural areas where more people rely on a car? Having them in Chichester City Centre isn't going to help. There needs to be a more ambitious target. 4. Fabric First should be a requirement on building in all new developments 5. Car clubs are a great idea but Chichester's one is too narrow. Look at the Zip car model in London where you can pick up a car, drop it off at your destination and only pay for the journey. Quick and easy to use via an app. 6. There needs to be more information around the emissions from log burners. I would bet there are a lot in Chichester.

I think that you have identified the important issues and locations of particular concern. The LCWIP is a fair start, but more is needed, for instance re the Northgate Gyrotory. And car speed limits should be enforced, eg College Lane. I would be ambitious about cycling, as Chichester is a natural for cycling - I can get to most places within the city on a bike within 15 minutes and use my bike for almost all my local journeys. But an inexperienced cyclist does need to feel safe. So does someone teaching children to ride. Also we need separate cycle paths rather than the dangerous shared paths; from choice I use the old cycle lane on Broyle Road rather than the shared path, as so many pedestrians are oblivious to the presence of cyclists. Someone should go to Holland and see how really to deal with these matters. I welcome proposals re electric bikes as a start, which should get more people cycling. I like the ideas of electric cargo bikes and also bike hire. Re bike parking, I think that provision within the city centre is good. Having been campaigning in Chichester East ward this week, I am far less impressed by provision for safe bike parking, for instance in Swanfield. I used to live in Midhurst (forty years ago!) and that is potentially very good for cycling too; I did most local journeys there too by bike. Next time there are temporary cycling lanes, someone needs to talk to the Cycling Forum, as the last attempt was a harmful fiasco, which I fear has put back the cause of cycling. Also when I wrote to the WSCC Cabinet member about this, I received no response, not even an acknowledgement - not good (and indicative of lack of priorities?)! Someone needs to look at the lights at St Pancras, as that engenders a lot of stop/start (and also makes it the most dangerous junction for a cyclist in Chichester. I would also avoid the Tesco roundabout when cycling, as that is impossibly dangerous even for an experienced cyclist like me. I accept that you will have to work to national standards, but are they good enough? Should you be applying pressure for higher standards, all the more so when the health implications are so apparent? That said, I welcome the improvements indicated in your graphs, though I think that the more monitoring that is done the better. If we really are to use electric vehicles more, then present proposals can surely only be a start. We will need far more charging points very quickly. I like the idea of CDC setting a good (and hopefully very public) example. I also think that CDC needs to campaign with central government to make it more economic for its citizens to consider electric cars. What can be done to stop idling at the level crossings, which can lead to some very unpleasant air? When out electioneering the other day, I met a resident who was insistent that idling cars was a major issue for him. I welcome what is said about green walls and trees. Re car parks, please do not forget those who have big loads or who do not find walking easy. Please may I ask you to consider the amount of jargon in the plan? You beat me with GIS! Thank you for the consultative document. While some of it can inevitably be a first step, and I can already hear the cries of financial constraint (thanks especially to central government), it is a very welcome step forward on an important issue. John Newman 37 Maplehurst Road johnnewman@waitrose.com

If you are worried about pollution, maybe you can intervene in the mammoth incinerator plans in Ford

Most of the proposals seem to be targeting vehicle and heating related pollution. There does not seem to be anything to consider the impact of crops farmed in and around the city / county. Some of these crops are known to be toxic in themselves (e.g. rapeseed). Has any investigation into the impact of these on the population been made?

Air quality on Rumbolds Hill, Midhurst, currently an area of air quality management, is 'on a trajectory for compliance with National Air Quality standards by 2024'. But, the question is how air quality at Rumbolds Hill will become compliant as nothing appears to have changed and looking at the proposals for improvement, all seem to have been rejected. There doesn't seem to be a detailed analysis of the actual causes of the poor air quality, ie detailed traffic flow including what type of vehicles, purpose of travel, time of day etc etc. The proposed solutions appear to be unimaginative, there is no indication of "thinking outside the box". It may be that there are no solutions "outside the box", but radical changes need to be at least considered.

As well as getting an adequate cycle network in place as soon as possible I also wonder if there could be speed limits to make other roads safer for walking and cycling. For example in Bosham lots of people drive less than 1 mile to bring their children to the Primary School – some of it is about education of course but lots of people have commented to me that they wouldn't feel safe cycling down Delling Lane, or worse, that they don't even like walking with their children on the pavement as the cars rush by so fast. It's worse the other road to the school (Walton Lane) where there is no pavement. You could actually have a one-way system with one lane for traffic, a good two-way cycle path and a wide sidewalk – but a 20 zone would be a good start.

<p>Further comments extend to more than the maximum permitted 1,000 words, and will therefore be submitted via email (to letstalk@chichester.gov.uk).</p>
<p>Southern Regeneration plan will make Basin Road 2 way taking traffic off Stockbridge Road and thereby increasing traffic load on Basin Road Also planned developments in court house area and Basin Road car park will necessitate cars/delivery lorries using Basin Road too Furthermore why were air quality issues not embedded in the Southern Regeneration proposed developments initially apart from the consultants absurd statement that once the Royal Mail depot was a hotel the lack of Royal Mail vans on Basin Road would ease both congestion and pollution Air quality along Basin Road which has several houses and is the walking route for both senior and junior schoolchildren can only deteriorate When consultation for planned redevelopment of this area goes out to the public it should be subject to robust PR campaign so that it doesn't passed unnoticed as most CDC campaigns/consultations do</p>
<p>Change the traffic lights back at the hornet to improve air quality</p>
<p>Buses idling for long periods concern me. I see this a lot down Basin Road and can smell it in the air.</p>
<p>Funding for the proposed cycle paths should NOT come from contributions from developers as that simply means that developments have to go ahead in order to fund the improvements that are required now with the current population. Segregated cycle paths between the Witterings & Bracklesham/Chichester and Selsey/Chichester are required now to encourage cycling and reduce congestion rather than taking bribes from developers to possibly build the cycle paths at some point in the future. The change of status of the Stockbridge Roundabout Air Quality Management Area should be delayed until after the summer tourism peak and after a wider post-covid return to work has been achieved so that these figures can be included in any assessment.</p>
<p>I believe that the decision to stop monitoring Stockbridge is ill-conceived. At the very least the comparison being used should be moved from Spring 2021 to Autumn 2021. The report suggests that queuing at the Stockbridge roundabout occurs only occasionally. This is, and for many years has been, incorrect. I don't know the reason but the A27 has been much worse since the end of the last lockdown. Queues often extend from the Stockbridge roundabout to the one at Hunston and back towards the Bognor roundabout and last for several hours..</p>
<p>On behalf of Donnington Parish Council: Donnington Parish Council strongly advocates the Stockbridge A27 Roundabout remaining an AQMA. As an absolute minimum existing Nitrogen Dioxide monitoring should remain in situ. However, we propose several ways the Stockbridge AQMA should be improved. Stockbridge Road has a large volume of traffic, far larger than in 2008 when the AQMA was instigated. There are static traffic queues every weekday morning and evening and frequently on summer weekends due to beach traffic. Lower Nitrogen Dioxide levels are a small part of the picture and do not alone provide sufficient evidence to cease monitoring. The laughable sentence: "The junction generally does not feature significant queues but at peak hour does feature queueing." from the draft AQAP suggests a serious underestimate of the levels of stationary traffic Donnington suffers. The draft report itself is far from emphatic. On the one hand we're told "there are now strong indications the local air quality has improved" whereas the Phlorum Modelling Report describes "model uncertainty due to inaccuracies in input data". It is also caveated with "No liability is accepted by Phlorum for the accuracy of the data". Traffic data is taken from 2014, (paragraph 4.10) and then extrapolated forwards to 2020 and ultimately 2025, which doesn't inspire confidence. Particulate Matter is not currently directly monitored. Instead, it is calculated. Modelling is far from accurate as can be seen from the number of adjustments required in the "Chichester District Council Air Quality Action Plan Review - 2020". Particulate matter has been associated with many serious health issues, including premature death, heart attacks, asthma and decreased lung function. Given this Particulate Matter should be monitored in the Stockbridge area, not estimated. The current location of Nitrogen Dioxide monitoring on Stockbridge Roundabout itself is in a fairly open area relatively distant from residential buildings. It seems likely that some of the worst the pollution will be slightly to the south on the A286 between the St Georges Drive Roundabout and beyond Upton Road Junction to the Stockbridge Roundabout itself where traffic sits between rows of houses. In addition to monitoring on the Stockbridge Roundabout itself, Particulate Matter Monitoring & Nitrogen Dioxide Monitoring should be conducted on a suitable site Between St Georges Drive and the Upton Road junction. If budget is an issue Donnington Parish Council will be willing to discuss the extent to which the Parish can</p>

contribute financially to the management of the AQMA. Also can CDC officers please recommend an affordable PM2.5 Monitoring instrument from the many on the market that will be good enough to provide comparative data - with a statement on accuracy range. To sum up, Donnington Parish Council's feedback to this consultation is that the Stockbridge AQMA should remain in place as a bare minimum, but monitoring should also be improved both in terms of the categories of pollution monitored and the locations that monitoring takes place.

As CDC's Local Plan includes the SLR it does not make sense to remove AQMA's in the area. The disruption of the development on the A27 will take up to 8 years, this is 8 years of congestion and potential increase in air pollution. The traffic will be diverted through the city of Chichester causing more pollution in Orchard Street and St Pancreas. I cannot see any traffic forecasts in the report and therefore can only conclude that increase traffic due to the SLR have not been included. There has been a 104% increase against pre-covid car usage, this has not been considered in the report. WSCC has the data. EVs are NOT emission free as they produce PMs just like combustion vehicles. Also EVs have a high carbon usage rate in their production over standard vehicles so the '#zero carbon' label is a false and misleading one. As a responsible council how will you ensure that all EV batteries will be safely disposed of at the end of their life? The survey does not include or promote the use of alternative travel such as buses or public transport. With an ageing population fewer people are likely to be able to walk or cycle so clean air buses are essential but not mention. No Air Quality monitoring should be removed in the current climate. CDC declared a Climate Change Emergency but proposals the removal of air quality, simply does not make sense. The data does show a down turn but this decrease has not been sustained for a long period of time to conclude the removal of the monitoring system. I would also add, how many vehicles are using the local roads instead of the A27 over the last 4 years as this data has not been considered or considered in the modelling. If more cars are being '#displaced' onto local roads from Orchard Street and Stockbridge then this would distort the data and not reflect the true levels of pollution in the Chichester area. DO NOT REMOVE THE AQMA.

The air quality monitoring should remain at the Stockbridge Roundabout

I think that cars with ULEZ and low emissions should have cheaper parking, more environmentally damaging cars should have to pay more. Also ensure cycle lanes are available

Link this plan to opposition to any proposals to widen the A27 or make any flyovers which just encourages more car use. Incentivise local businesses to ditch old diesel vehicles which pollute excessively. The many local tradesmen in Selsey and Chichester are good examples as is Bunn's Leisure Parks where their vehicles pump out fumes all day regardless of the children in close proximity. Be careful about going too quickly to replace reasonable vehicles with newly-built electric vehicles as there is huge environmental impact caused by the manufacturing of such new vehicles but also because hydrogen power may be better environmentally than electric power. Charge a levy on the Earl of March for the polluting racing at Goodwood and the attraction of vast numbers of polluting vehicles to his events.

Idling when stationary queuing, waiting at Chichester level crossings, waiting outside shops, to pick someone up should be a traffic offence or at least advisory signs (lit up and flashing at level crossings etc). Reinforced by "action days" where officials with reflective jackets are visible and advising motorists to cut their engines. Also work with police and highways to reinforce speed limits (including road markings and more signage) to reduce emissions (and noise pollution) especially in residential areas. College Lane and Summersdale Road spring immediately to mind.

Building several thousand more dwellings in that part of the District outside the South Downs National Park and Chichester Harbour ANOB is going to increase the number of cars around Chichester. Every new house is likely to have at least one car and often two or more. It is wishful thinking to suggest that electric vehicles will solve the air pollution problem until they become affordable.

Orchard Street should continue to be monitored given the regular nose to tail traffic during morning rush times. Since pandemic restrictions eased, traffic levels have increased and traffic is regularly backed up to the Westgate & West Street roundabout from the Northgate one way system.

As a resident of Orchard Street I am extremely concerned at the decision to discontinue Air Quality Monitoring. More should be being done for the residents of Orchard Street and the school. How can the level of pollution be safe for children who are not yet fully developed and are particularly vulnerable ? The amount of HGVS has increased significantly since the introduction of new housing developments. Between the hour of 8am and 9am 30 HGVS travelled through Orchard Street. This road is not designed for HGVS the noise level has significantly increased and cracks appear in walls. More and more housing means more and more cars. This road is busier than ever and is a rat run because of the congestion on the bypass. Cars travel at more than 30 mph, 20 is plenty where you live this is a residential area. How can it be morally and ethically acceptable that people should have to stay indoors because the air quality is so poor ? It is not an answer to the problem. The dirt and pollution from vehicles travelling on this road is unacceptable. I am aware of a resident who developed dementia and another who has developed a chest complaint. Why have the introduction of electric buses not been considered ? Jackie Cooper

I don't trust the AQA reported figures for Orchard street because they include extrapolations, adjustments and moderations to the raw data. I also do not think pollution in Orchard street has reduced, other than as a direct result of the Covid restrictions. I live in the centre of Chichester and have Asthma and Lung damage. I have two air purifiers in my house operating 12 - 24 hours a day. I should not have need of them. There is a school on Orchard Street and we owe it to the pupils and staff to clean up the traffic pollution and to maintain rigorous monitoring. With the addition of circa 750 White House Farm development dwellings, I believe the pollution in Orchard Street will increase over the next few years due to use by those residents in the absence of a Southern access road. I object strongly to removal of any monitoring sites. In addition, there are increased construction HGV movements through Orchard Street to Whitehouse Farm and back again to the A27. Many lorries have electronic cheat devices that pretend to use AdBlue, which reduces N02 emissions, without actually using the fluid. I would like to see CDC, in conjunction with the DOT, operate random checks on vehicles using the A286 via Orchard street to catch the offenders. For the above reasons I strongly object to the removal of the Orchard Street monitoring station. I also believe that all existing monitoring stations should be retained.

The increase in cars and heavy goods vehicles for Whitehouse Farm estate is highly likely to massively increase the air pollution in the Orchard Street area. I strongly disagree with the air quality monitoring in this area being stopped.

I live on the Chichester side of Stockbridge road and I find the traffic fumes are horrific all day long

I'm very concerned about air quality in Chichester and believe more needs to be done asap and more monitoring be undertaken to inform plans and eventually assure residents that air quality is good and/or improving.

I am particularly concerned that monitoring of areas with air pollution problems is being cut back. This is premature: - many of the figures are estimates or projections or incomplete due to problems with the monitoring equipment; - the number of heavily-polluting SUVs continues to increase, and there is no sign that buses in Chichester will be less polluting; - CDC is encouraging very large numbers of new houses to be built. All Whitehouse Farm traffic is expected to use Orchard Street, so there will be above-average traffic increases; - we can see that traffic is increasing to pre-pandemic levels and more, with the massive campaign to discourage people from using public transport and changed and disrupted work patterns. Nobody can forecast how traffic and pollution levels will change. This is the time to increase and extend monitoring of air pollution in many parts of the city, and especially near schools (given the recent case where a child died of air pollution caused by road traffic). We need accurate factual measurements, not theoretical models and optimistic estimates.

<p>Thank you for the opportunity to comment on the draft Chichester District Council (CDC) Air Quality Action Plan. These comments have been prepared by officers on behalf of the County Council. We support the draft Plan and believe this is a proportionate and suitable response to the challenge of tackling air pollution in the District. We welcome the improvements in air quality within Air Quality Management Areas that have been recorded over the last few years which we understand to be driven in particular by improvements in the vehicle fleet nationally. We support the approach to move towards undeclaring AQMAs within Orchard Street and at the A27 Stockbridge. In the case of the A27 Stockbridge AQMA, it is important that any future Highways England A27 proposals are designed to ensure that they do not lead to any further AQMA issues at this location and it is assumed that CDC will be keeping a watching brief over any proposals. We support the general range of activity set out within the action plan measures, which link to measures in our current West Sussex Walking and Cycling Strategy 2016-2026, West Sussex Bus Strategy 2018-2026 and West Sussex Electric Vehicle Strategy 2019-2030, as well as our revised West Sussex Transport Plan which is in preparation. With regard to the action listed to review on-street parking arrangements in Midhurst on page 47 of the Plan, please note that a review of parking arrangements for Midhurst does not currently form part of the County Council's forward programme for on-street parking management. The consideration of a future review in Midhurst will only be favoured where there is clear evidence of residents and other road users experiencing difficulties in parking and where any intervention on the part of the County Council has the initial support of the local community, including County Councillors and the District/Town Council. With regard to actions around tackling grey-fleet mileage and encouraging sustainable travel to work by employees, we think it would also be helpful to include consideration of the benefits of working from home in reducing commuter travel. We have also identified 2 specific minor points of clarification. p.41 of the Plan under Theme 3: Planning for sustainable transport includes an incorrect reference to Local Transport Infrastructure Plan which should be removed. The list of actions in the table on P.47 of the Plan includes reference to the Inclusion of air quality policy in the revised Local Transport Plan (LTP3) – this should be reworded to say 'Inclusion of air quality considerations in the revised West Sussex Transport Plan'. We look forward to continuing to work with CDC on interventions which can further reduce transport emissions across the District.</p>
<p>The Stockbridge Roundabout needs greatly increased monitoring. Especially south of the Roundabout, as far as the St George's Drive roundabout.</p>
<p>Increase air quality monitoring. We're sleep walking into a public health disaster. Our children are breathing fumes.</p>
<p>Traffic volume and speed through the centre is excessive. Idling is an issue. . Polluting cars are allowed, there are no restrictions On a general note 20mph zones are ignored by the majority of divers encouraging the town roads to be used as thoroughfare not as a commercial or residential town setting.</p>
<p>Reduce the number of proposed house building improve junctions and traffic lights sequences for traffic flow. persuade brown land to be built on first Remove speed humps Continue monitoring as air quality has improved through lockdown and the reduced use of personal transport Please introduce joined up cycle lanes some are good but some stop. Introduce a cycle lane from Bognor Bridge roundabout to Bognor</p>
<p>Please be aware that while electric vehicles may help climate by reduction of fumes they increase the particles that reduce the quality of air that we breath</p>
<p>Vehicular traffic in Orchard Street decreased during the Covid lockdowns. It is already back to pre-Covid levels when air pollution was unacceptably high. The health hazard this creates is becoming increasingly clear. House building around Chichester continues apace. Whitehouse Farm Phases I and II will increase traffic levels in Orchard Street. CDC proposals for no right turns at A27 roundabouts will also redirect traffic onto the A286 including Orchard Street. It is vital that residents are kept informed about risks to their health from air pollution, that the monitoring station is maintained and the evidence it produces is made available in a clear way</p>

Given the queues and the importance of Stockbridge roundabout to travel of both local and through traffic, the monitoring should stay. This junction suffers more queuing than the peak hour referred to in the report, casting doubt on the knowledge and awareness of the actual realities of this junction. Monitoring and reporting should remain, especially whilst plans are being made to alter this junction, to ensure an informed view of the impact can be made in years to come. Monitoring should be increased to include PM2.5. If the council are serious about air quality, it shouldn't be decommissioning monitoring, but instead increasing it to ensure the residents of Chichester are aware of the levels and that continual improvements are being made.

1. I would strongly urge air quality monitors to be arranged at the bottom of St Paul's Road where it enters Northgate roundabout. 2. I cannot understand why air quality is worse in St Pancras than in The Hornet.

There should be an air quality measuring unit near Central School in Orchard St. Not only because of the children in the school but also because parents with young children and babies in pushchairs/prams wait to collect children from the school.

Could Chichester ban diesel powered vehicles from Chichester. Provide 2 Park and Rides on the outside of Chichester before further houses are built. Fine drivers who idle their cars. Monitoring the Air Quality near St Pancras Eastgate must lead to appropriate action, otherwise monitoring is a waste of time. Cycling must be safer or people won't want to cycle for good reason.

I trust that more pollution monitoring will take place in the District. Basin Road in Chichester has high levels of pollution. It is particularly busy at peak times with local traffic and at holiday times and weekends with traffic going to the coast. Regular pedestrians and those with cycles include many school and college students. Existing notices requesting motorists to turn off their engine are mainly ignored - partly because of drivers' anxieties to be ready to move when rail crossing gates are due to open. The siting of the bus station also plays a part in the congestion. Whether the Southern Gateway Plan will alleviate these problems remains to be seen. Another road with high pollution levels is the Fishbourne Road with traffic passing through the village to avoid the A27 going East or West.

Additional comments received by email¹:

Midhurst Town Council:

Dear Mr. Ballard,

I am writing this on behalf of Midhurst Town Council of which I am a member - the plan was discussed at the Community and Environment Committee on 14th June.

The following points were made

1. The MTC was pleased to see that there was a consultation on going and to be a part of that.
2. We are happy to be engaged and seek to help in any way we can, as we understand the seriousness of the issue.
3. We are aware that the nature of Rumbold's Hill causes a number of issues for people over and above air quality, so any solution that tackled a multitude of issues would be welcomed.

¹ Please note full names of correspondents have been removed and are denoted by initials only.

4. We were glad to see that two areas have improved so much so that they are off the areas of concern list. It was noted that a number of positive initiatives had contributed to this.
5. We understand that, as Rumbold's Hill was only declared as a site of concern two months before the first lock down that the data is very uncertain.
6. Whilst noting that there has been a positive trend for a few years in Rumbold's Hill air quality, we were not fully convinced that an approach that seemed to be relying on that trend alone might be excessively optimistic, although the data will in due course inform us.
7. Mention was made of improving the situation regarding parking in North Street but, whilst that would be universally welcomed here, we did not see an obvious link to improving the air quality in Rumbold's Hill.
8. We noted that one of the greatest contributors to poor air quality at the location seems to be buses and lorries. A casual observation would suggest that the number of passengers often on a route 60 bus through Midhurst could fit into a taxi and we would ask whether any thought had been given to approaching Stagecoach about providing newer and possibly smaller vehicles, perhaps running more frequently. Many countries operate mini-bus sized fleets (privately or publicly) very successfully - such a change would surely reduce the levels of pollution and congestion and provide a much more appropriate service to the customers.
9. We would be happy to engage further, if it were felt we could contribute to the issue.

Kind Regards

NY

RM:

FURTHER COMMENTS ON THE DRAFT AIR QUALITY PLAN : SECTION 4

1. FOREWARD BY CLLR PLANT

1st Para “...*public's desire to see action*” and 2nd Paragraph “*the health impacts of*” are valid statements of FACT. No problem with that narrative

However the narrative in para 3 “ *there are now strong indications that local air quality has improved* “ is a misleading statement to the public. She has used FACT from Orchard St and Stockbridge monitoring station, and from the PHLORUM * Consultancy Modelling report to create a “*good news*” soundbite to the public, the vast majority of whom will read the words and take the cleverly scripted message and assume she is referring to Chichester in general. In addition this is arguably a flawed narrative based on the terms of the brief provided by CDC to PHLORUM * (NB * more on the consultant modelling later in this document)

FACT The rat runs through residential areas in the City, and the approach roads to the under capacity A27 are areas where congested traffic is adversely affecting the Air We Breathe with what Cllr Penny calls the “*invisible killer*” ie PM2.5.

FACT Since the AQMAs in Orchard St & Stockbridge were established back in 2007, the traffic flow patterns have changed dramatically. The modelling data in the PHORUM* report excludes the rat runs eg Spitalfield Lane, Westhampnett Rd, St Pauls Road, Bradshaw Rd/Swanfield Drive, A259 approach to the Hornet, all of which are through residential areas, and in some cases canyoned, where pollutant levels are particularly damaging.

To knowingly exclude these roads from the Consultants Brief and Scope of work, and to not make the public aware, raises doubts not only on the motives of CDC Executive and Management, but also on the CDC Cabinet. What residents experience is inner city and approach road congestion!

FACT The public, via the Media, are fully aware that fine particulate PM2.5 is the most damaging pollutant. There is also scientific evidence reporting that the air we breathe, while in slow moving/congested traffic while in a car is as damaging as that experienced by pedestrians. Ironically, cyclists using the rat run roads, by nature of their more strenuous exercise and deeper breaths are inhaling a higher volume of PM2.5. (recall the ill conceived pop up lanes, the congested traffic and think about the air the cyclists were exposed to)

Does CDC genuinely believe the public will swallow this narrative given the lack of road infrastructure, under capacity A27 and the exponential growth of SAT Nav guided through traffic in the city. Add to that the ever increasing house building. In the light of what I have registered as additional comment, ask the public and get their response. With reference to the questions in the "Have Your Say Survey", informed members of the public would argue that it was constructed to deliver a predetermined result.

AQAP – Based on the above comments, please consider a change to the narrative in the foreword to reflect reality

2. FINE PARTICULATE PM2.5 – THE ACTION PLAN CONTAINS WORDS ON THIS, BUT LACKS ANY ACTION TO ATTEMPT TO GET FACTUAL DATA, EVEN AS A PILOT STUDY TO SUPPORT MODELLING DATA.

FACT- There is no statutory duty for CDC to measure/monitor PM2.5

In section 3- The National context, Para 4 "The UK has a national emission reduction commitment for PM2.5.....The policy guidance does however suggest that the authorities should seek to move towards a specific objective in line with the annual average EU limit value for PM2.5 of 25ugm."

In Section 4- The Environmental Bill Para 1 ".....we understand, will set a legally binding target for PM2.5"

FACT – DEFRA Clean Air Strategy 2019 (extract from quotes) “ #shifting the focus towards prevention # promoting greater action to avoid exceedances, rather than tackling air pollution only when limits are surpassed # requiring local authorities to create an action plan to reduce population exposure during Air Pollution Episodes to protect public health #enabling greater local action on PM2.5.

To put an AQAP out for Public Consultation, without an action to gather ACTUAL PM2.5 data, even in a pilot, in anticipation of the Environmental Bill, is arguably a Policy Position made by Senior CDC Executive, Management and supported by WSCC who have responsibility for Roads.

MODELLING VS FACT – It is a fact that modelling data outputs provides ranges of possibilities , which by their very nature fluctuate wildly according to the assumptions used and the data submitted. To apply a confidence level to modelling data , at least some level of actual data ie FACTS would substantiate the modelling data. The opposite is true, without a baseline of study with ACTUAL data, the modelling data is suspect, open to manipulation to deliver an output that may suit a particular narrative for a desired outcome.

The Phlorum Modelling report articulates, quote “ model uncertainty due to model formulations and data uncertainty due to inaccuracies in input data” and goes on to state that, quote “this assessment has chosen inputs tending towards ‘worst case’ , really !

As the Consultants brief excluded modelling in the rat runs, and the FACT that the traffic data used, quote from Phlorum report para 4.10 , “transport evidence base study 2018 for Chichester Local Plan Review based on 2014 base flows”. Scaling was then used for 2018 2020 and 2025 !

Based on the Traffic data being derived from the 2014 base, the exclusion of modelling in the city, coupled with the absence of any factual PM2.5 data substantiates the lack of robustness of the draft AQAP .

Few politicians have any understanding of science, so they become captives of their officer’s advice, and fail to question the validity of the Modelling Data. CDCs Cabinet Member for the Environment, Cllr Plant has a science background, so based on this “Have Your Say” input, some serious challenges must be tabled to CDC Environmental Management, the Executive responsible and to make her Cabinet Members aware of the issues and concerns .

AQAP – Recommend at least two Pilot Studies (a) & (b) below, with possible extensions to other areas (refer to section 5 of this Document) are incorporated into the AQAP. The

- (a) CDC are fully aware of Public Concerns at the south end of St Pauls Rd, caused by SAT Nav guided through traffic to avoid the Fishbourne Roundabout. This will be further excacerbated by the traffic flow from the Whitehouse Farm development.*

(b) Full length of Spitalfield Lane...the main Rat Run artery.

3. LACK OF CONFIDENCE LEVEL DISCLOSURE IN THE AQAP

Until such times as Actual PM2.5 data is gathered in Chichester, the total reliance on DEFRA's emissions factor toolkit (which uses PM10 data to estimate PM2.5) a higher confidence level on the data output, as relevant to the rat runs, would deliver a more accurate evidence base for environmental decisions. The current AQAP makes no statement on confidence level. The conversion from PM10 to PM2.5 is only relevant where PM10 is monitored. The DEFRA Toolkit, Section 7.109 is very clear and computes an estimate only.

CDC stated in their 2015 AQAP that quote "In Chichester the dominant local component of air pollution is emissions from road traffic". The congestion in the city, hence pollution, and on the approach roads has increased dramatically since then?

This lack of confidence level disclosure was tabled as an issue to CDC/WSCC officers during the Pop up Cycle lane fiasco which caused severe congestion. CDC refused, or were unable to answer, the question raised on the confidence level of Air Quality modelling along the cycle route from the remote Orchard St Monitoring station. Ironical that they now recommend decommissioning it.

AQAP – Disclose the confidence level for the PM 2.5 modelling. Include an action in the plan to deliver an improvement in Confidence Level by leveraging comparative data from Pilot studies. This action would deliver at least some factual baseline data in readiness for facing the challenges that are on the horizon from the Environmental Bill. If the data captured supported a narrative that there is no problem, that would be positive outcome from this AQAP consultation.

4. THE PHLORUM MODELLING REPORTS

Interestingly the PHLORUM introduction states "No liability is accepted by PHLORUM for the accuracy of the data".

The intro goes on to state "CDC commissioned Phlorum Ltd to undertake a review of air quality across their district and to assess key areas of concern for air quality."

So, inner city residential areas and approaches to the A27 are not considered areas of concern by CDC yet they expect the public to swallow the good news soundbite mentioned earlier in this document !

Ask the public if they believe the taxpayers money spent on engaging Phlorum Consultants, with a Scope of Work , that has now delivered a very questionable outcome, was value ?

CONCLUSION – The consultant has produced data output, based on CDC Terms of the Briefing and sets of WSCC provided Traffic Modelling. As mentioned earlier in this document (refer Modelling VS Fact), the output is flawed, open to manipulation but has enabled narratives that may mislead the public. The traffic modelling metrics alone can make a significant difference, especially as the report does make clear that “the modelling results do not consider non implemented Highways changes” . Even more significant, the report excludes any consideration of a Highways England solution to the undercapacity A27.

The impact from construction work on the current bypass, with the resultant diversionary traffic through the city over an extended period (quoted by HE to be approx. 4 years) is an omission that would make Inner City Residents doubt the narratives coming out of CDC who are fully aware that both their Local Plan and the Transport Plan have a dependency on Government Funding. By not including an assumption that Chi are likely to get some form of RIS3 funding makes nonsense of the traffic data supplied by WSCC ! Not only should the AQAP include an action to address the Scope of Work limitations, it would help transparency if both LA Environment Cabinet Members (CDC & WSCC) addressed the limitations of this draft AQAP to their respective executives with an Action Plan to resolve the issues following the Public Consultation.

5. DECOMMISSIONING OF THE AQMA IN ORCHARD ST & STOCKBRIDGE

(a) Orchard St - The data does support removal of the Monitoring Station where it was cited many years ago (I do not have the year but would estimate it has been there for 10 years +). However as discussed earlier, the traffic flow has changed with congestion occurring, and increasing in St Pauls Rd . Requests to CDC to extend the AQMA into St Pauls Rd have been turned down by CDC .

A common sense decision would be NOT to revoke the AQMA, but to report in the ASR (Annual Status Report) that while the automatic monitoring station in Orchard St would be decommissioned in 2021, the AQMA would be extended around Churchside roundabout up to the junction with Little Breach. This extension should have NO2 Diffusion Tubes receptors. This area could also be used as a pilot for actual PM2.5 baseline data collection. Blue Sky Hyperlocal Urban Air Quality Monitors , the Environmental 2020 New Product of the Year , could be used. They are available to rent (link below). Interact to get an accuracy assumption, and hence a confidence level statement, from TSI. A proposal made in 2018, to use Academia via a post graduate study with PM2.5 actual data , was eventually rejected by CDC in May 2019 on the grounds they quote “are satisfied they have all the necessary data at this time”. Interestingly G Keegan stated in Feb 2019 , quote “if the study goes ahead the evidence it provides will be welcome”.

Times have moved on and the public are increasingly aware of the so called “silent killer”. Maybe now CDC could put together a Pilot Study and possibly resurrect an updated Academia Project to supplement a Pilot Study . (suggestion, design a pilot study with diffusion tubes/PM2.5 monitoring in close proximity in the rat runs , and compare the data with diffusion tubes/PM2.5 monitoring placed as close to the current positions of the auto monitoring stations when they are decommissioned.)

The evidence this would provide would be welcome and arguably would contribute positively to a modelling confidence statement.

[TSI BlueSky Air Quality Monitor - Rental, Hire & Purchase \(ashtead-technology.com\)](https://www.ashtead-technology.com)

This would require a Policy Change, but for how much longer can CDC hide behind the ongoing statement they have no statutory duty.

- (b) Stockbridge – The topography in the approach road to Stockbridge roundabout is not as canyonised as St Pauls Rd. However, the pollution from the traffic congestion must be a huge concern to Donnington residents with traffic backed up south of the St Georges Drive junction on the A286. This has got worse since the Free School was opened.

Wouldn't it be a breath of fresh air if CDC were proactive, instead of defensive and gathered actual PM2.5 data with the opportunity to compare facts from different topographies.

CONCLUSION. – REMOVE THE AUTO MONITORING STATIONS TO REDUCE COST , HOWEVER DO NOT REVOKE BOTH AQMA_s , EXTEND THEM TEMPORARILY AND STATE CLEARLY WHY. FUND A PILOT STUDY AS A DOCUMENTED ACTION IN THE AQAP, BY DELAYING EXPENDITURE ON E BIKES FOR STAFF, AND DELAY EXPENDITURE FOR THE POOL CAR FLEET, BOTH OF WHICH WHILE POLITICALLY CORRECT, BUT IN REALITY WOULD OFFER ONLY MINISCULE IMPROVEMENT TO AIR QUALITY. TOP UP WITH SAVINGS FROM NON USE OF OFFICER TIME MANAGING THE AUTO MONITORING STATIONS, AND IF NEEDED GET FUNDING FROM LA RESERVES. THIS SHOULD BE POSSIBLE IF THE CDC CABINET ARE SERIOUS ABOUT AN ACTION PLAN TO ADDRESS THE PUBLIC HEALTH ISSUE FROM “THE SILENT KILLER”.

Note... Extend the pilot use of Diffusion Tubes /Blue Sky Monitors into the rat runs. Recommended priority would be Westhampnet Rd and The A259 approach road from LA Fish up to the Hornet.

Input provided by

Robert Marson

PO19 5DZ

18th June 2021

The Chichester Society:

There follow below, further comments to expand / add nuance to the responses given by the Chichester Society to the CDC Web-based questionnaire.

We would particularly like to highlight:

- * The potential for differential parking charging to play a greater part than is recognised in the consultation document, and
- * The potential to use the planning process to more strongly steer outcomes.

Air Quality Action Plan - Further comments

General note: The consultation document does not give the costs of the various proposals. So, when stating that a proposal is desirable, the Chichester Society is not in a position to give an informed opinion as to whether it is also good value for money.

● Replace Chichester District Council cars and Large Goods Vehicles with electric versions wherever possible, and help to optimise waste and recycling routes.

We replied "agree" to this proposal. But more nuance is needed. Any such move should be done gradually, to keep a cap on costs and to monitor for unexpected problems (and possibly for incoming new disruptive technology too).

● Encourage green travel amongst Chichester District Council staff for all journeys.

We replied "Strongly agree" to this. However, in some contexts, "staff" can exclude elected councillors (members). For the avoidance of doubt, where practical, councillors too should be encouraged to take greener travel options. In fact, it is important they are seen to set an example.

● **Participate in the all Sussex councils' air quality group (Sussex-air), and support Air-Alert ...**

We replied "Strongly agree". Note also the follow-on implication that, if the air Air-Alert service is to provide the same quality of information as it currently does, there is a need for ongoing monitoring of Ozone levels (if not at Lodsworth, then somewhere else).

● **Delivery of a pilot pool car fleet for Chichester District Council staff to use on work related journeys.**

For the avoidance of doubt, the term "staff" should include elected councillors in this context.

● **Provision of a small fleet of ebikes for Chichester District Council staff to use on work-related journeys.**

We replied "strongly agree". However, similarly to previous comments, this should be rolled out only gradually while monitoring uptake (and possibly incoming alternative technology). Any such scheme should also be made available for elected councillors (members) – not just employed staff.

● **Based on the evidence, to what extent do you agree with these proposals?**

We replied "disagree" because the questionnaire here conflates two separate points. Specifically, the proposals for Stockbridge A27 and Orchard Street have been lumped together with the proposals for Lodsworth.

The de-listing of Stockbridge and Orchard Street seems the right thing to do under standard procedure. The replacement on-going monitoring *may* be acceptable if it provides figures robust enough to rapidly re-instate an Air Quality Action Zone if future developments create sufficient downturn in air quality (e.g. more congestion than predicted, extra construction traffic on Orchard Street, or an unintended consequence of any Stockbridge Relief Road).

On the other hand, there is a strong case for continuing ozone monitoring at Lodsworth. This is the logical conclusion of the document's comments that: "*Ozone is an important pollutant both in relation to public health, its impact on crop-yields and other eco-system effects As the pollutant is produced by photochemical atmospheric reactions driven by bright sunshine ... it is predicted that ground level ozone will worsen due to climate change.*"

Note also that "*ozone may exacerbate severe asthma and even cause death among asthmatic subjects.*" (<https://thorax.bmj.com/content/57/8/687>). Therefore, as already indicated, ongoing ozone monitoring seems to be an integral part of the council's commitment to maintaining a robust Air-Alert service.

The above comments add extra nuance to the short answers given to the questions on the website. The comments which follow below address the "ongoing actions" discussed in the consultation document.

MODAL SHIFT

The consultation document describes a 2 or 5% modal shift to walking and cycling as being "highly ambitious" (p37). It is not highly ambitious. South of the Downs, Chichester District is as flat as Holland and experiences similar or perhaps better weather. In Holland "*Over a quarter of all journeys ... are by bicycle. Even the over 65 age group make nearly a quarter of their journeys by bicycle*"

(https://en.wikipedia.org/wiki/Cycling_in_the_Netherlands).

Cycling levels in Chichester are much lower. A 5% increase does almost nothing to 'move the dial'. More ambition is needed. If you at least start by aspiring for Holland type levels of cycling, you should be able to shift the dial by substantially more than 5%.

DIFFERENTIAL PARKING CHARGES

The document mentions "*Differential parking charges to favour EVs*" (p. 54). This is then ruled out on grounds that "*EVs are no longer a novel product and are predicted to reach price point parity within two years*".

This statement over-simplifies the present stage of EV adoption. Only last month, Lisa Brankin, head of Ford UK, stated "*Car buyers [are] still sceptical about going electric*" with only "*just over 10% of customers ... actively considering a battery electric vehicle as their next purchase*" (21 May 2021, <https://www.bbc.co.uk/news/business-57200593>).

In short, "price parity" is not the only consideration, and thus the District Council is in a good position to play a stronger part in encouraging purchasing of EVs.

Even more importantly, the above statement from the consultation document misses the point that differential charging is not only a way of directing new car purchases towards EVs, but it is also a way for the council to influence decisions as to which car is actually used for any particular journey.

To elaborate, for the foreseeable future, many households will have a choice between using a legacy fossil-fuel vehicle and an electric car. In terms of city-centre air quality, it is particularly desirable for the council to encourage use of EVs for journeys ending at one of the city centre car parks.

(Come to that, the council could do more to encourage smaller "compact cars" too. Not only because these tend to be less polluting, but also because they demand less road space (leading to less congestion) and more vehicles can be fitted into the car parks, thereby potentially increasing parking revenue for the council).

Differential pricing at CDC-controlled car parks should therefore not be dismissed. It is a policy with a strong ability to influence choices; including choices impacting directly on air quality in the city centre.

Differential pricing would also, of course, send a message as to the future the Council is hoping to see.

The price differential need not even be great (a charge of few pence saw a massive drop in use of "disposable" plastic bags).

Even if differential pricing is ruled out, CDC could site spaces reserved for low-polluting vehicles in more desirable locations within its car parks (i.e. typically parking spaces nearest the exits to the city centre).

PROVISION OF A CAR POOL AND ELECTRIC BIKES FOR COUNCIL EMPLOYEES

Is there any reason why such provision should not be shared with Chichester residents? Or, conversely, could the council not link with the existing car club provider (Co-Wheels) and so allow Co-Wheels to more quickly expand the number of cars they offer, and diversify their range into electric vehicles.

(Note: Co-wheels offers eclectic vehicles in other towns and cities, but currently does not do so in Chichester; seemingly for lack of places to charge. This lack could be rectified through use of land under the control of CDC.)

CONSIDER ANTI-IDLING CAMPAIGNS AT LOCATIONS SUCH AS RAILWAY LEVEL CROSSINGS (P42).

This does not necessarily need an all-out campaign. More carefully thought-out signage would help. (E.g. on Whyke road, there are "cut engine cut pollution" type signs somewhat down the road; relatively remote from the barriers. Drivers drive past these signs quickly. In contrast, there is no signage at the barriers themselves, where drivers are stopped and are more likely to spot the signs).

Also, pollution at the level crossings would be improved if Network Rail did something about the currently frankly ridiculously long periods when nothing is happening but the barriers remain down – for no better reason than that several sets of barriers along the track are linked in operation.

It is understood that Network Rail does have plans to de-link the operations of the barriers and so improve these timings. A word in the right ear from the District Council might bring those plans forward.

(An illustration of what should be achievable in the city centre comes from un-linked barriers in places like Fishbourne, where the barrier is never down for long despite seeing exactly the same trains).

RE-ROUTING OF LARGE HGV'S AWAY FROM A272. (P54)

The document states that "action is not being pursued". The reason given seems sound (this is a designated secondary route for HGVs).

However, there is an argument for encouraging HGVs to use the A272 only outside peak hours. Mechanisms for robustly doing so are not yet with us. However, within the 5 year timeframe of this document, such mechanisms will likely arrive. For example, autonomous vehicles and/or greater use of vehicle-tracking technology by operators and insurance companies.

- - - -

THE MAJOR ISSUE LEFT UNADDRESSED - PLANNING

The document does not delve strongly enough into the ability of CDC to influence outcomes through the planning regime.

Too many current developments are overly car dependent. This has an effect on air quality (and also on congestion and on general quality of life for Chichester residents).

For example, the Shopwhyke Lakes development was advertised by the developer as being a "sustainable urban extension". In fact, however, it is severed by the A27 and forces greater car use than a true urban extension would do. (The remedial measures - like the pedestrian bridges - show no sign of being delivered anytime soon, and are anyway not of a nature which would make the site a truly seamless extension.)

Meanwhile, the White House Farm site did offer the possibility of a truly sustainable (i.e. un-severed) urban extension. In short, it offered the potential to "design in" high use of modes of transport other than the car. Yet current proposals privilege the car and, worse, by inserting a southern access road for motor vehicles, do significant damage to existing high-quality walking and cycling routes (along Westgate and Centurion Way).

In short, in terms of air quality, congestion and quality of life, planning of new developments around Chichester could be far better handled than has recently been the case.

Even where the council is hampered by developers being able to stick to statutory minimum requirements, one suspects that a stronger lead given during pre-planning advice might improve the situation.

In particular, reflecting one of the ideas to emerge in this air quality document, pre-planning advice could more strongly press the case for car clubs within new developments. And the council could facilitate discussions between developers and car-club providers (such as Co-Wheels).

Also, within the planning regime, there is a need for greater awareness of the case for "*reducing the need to travel in the first place*". (This is particularly salient as the move away from fossil fuels to lithium-based battery technology is – in some places – simply substituting one form of environmental damage with another.)

Earnley Parish Council:

Thank you for your email, Earnley Parish Council would like to make the following comment on this consultation document.

Since the main reason (apart from cost) people don't like electric cars is the small range, and seeing that Chichester District sees large numbers of day-trippers from as far away as the London area, it is the view of the Parish Council that CDC should be engaging with private car-park owners and tourist destinations and seeking to provide better recharging facilities where visitors are likely to park when visiting the area

RN:

May I make a very small point. I could not find anything about the Goodwood Aerodrome and Motor Racing Circuit which must be a contributor, however small compared with the A27.

Is it so small not worth the bother?

Not a trick question, I am interested as a resident of Lavant, who does occasional enjoy the fun of the Motor Circuit, can it carry on if we are to target Zero? Hope so as i love the old cars, but we must do all we can to save ourselves from our selves.

SM:

Thank you for your letter with regard to air quality within the Wittering's West Sussex.

Firstly I would disagree with your statement and can only assume that the air quality measuring equipment has never been used on the Wittering's roads morning & evenings on Bank Holidays!

I have often had to wait 10 to 15 minutes to be able to cross the roads because the caterpillar of cars coming & going to the beaches/ to chichester and each churning out fumes whilst almost stationary.

This of course is not beneficiary to adults or children! So it may be a good idea to leave the Stockbridge roundabout and concentrate on the affected road network and taxpayers who live in the Wittering's/ Bracklesham areas. When cars are travelling you will find there is a significant level of pollution differing greatly from the reading you are studying!

On reporting to your council I was told by the official on duty that the solution was to provide council staff with electric cars. Of course, public opinion may have enforced changes here!

There must be a solution to this matter especially as children's health is at risk.

My very best regards

Ms SM

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The Chichester District Council

CABINET

11 January 2021

Engagement Response to National Highways A259 Chichester to Emsworth Cycling and Walking Route

1. Contacts

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2. Executive Summary

The six mile A259 corridor from Chichester to Emsworth connects a number of villages and parishes. It is a largely flat and straight-line route offering a good opportunity to create modal-shift to non-car modes of transport. The road is the diversion route for when the parallel section of the A27 is closed. The corridor and nearby settlements are likely to be included in the emerging Revised Local Plan for some additional residential development. The route is the second priority in WSCC's Walking and Cycling Strategy for delivery and WSCC has subsequently been successful in accessing National Highways (NH) grant monies for its delivery. NH has completed initial designs for improved walking and cycling infrastructure along the whole route and has recently completed a public engagement exercise. Overall, the indication is that there is majority support for the proposal in the ratio 59% to 30%. The local cycle forum and selected Bourne Forum parishes have proposed an alternative design which NH inform us is not technically feasible due to highway constraints and is non-compliant with disability requirements. The Council's Environment Panel has also considered the proposals and resolved that NH should reconsider the shared-use sections through villages. NH has asked the Council to confirm its view and states that there is no further design work that can be done and that the proposals are compliant with existing DfT guidance. Further NH state that they consider the Council as a partner in the work to upgrade the infrastructure and that were the Council to indicate its non-support or partial non-support then that risks NH ending the £5M project at this stage. WSCC is likely to indicate its position shortly and Cabinet will be provided with a verbal update if it is available.

3. Recommendation

- 3.1. Having considered the recommendation from Environment Panel (para 9.4), Cabinet is recommended to indicate the Council's support

for National Highways' proposed walking and cycling improvements to the A259 Chichester to Emsworth.

4. Background

- 4.1. An upgraded cycling and walking route known as the Chemroute, is proposed along the A259 between Chichester and Emsworth.
- 4.2. The route ranks second in WSCC's priority list of schemes in their Walking and Cycling Strategy. Being a high priority in an adopted WSCC strategy, and as a route running parallel to the A27 meant that it secured National Highways (NH) Designated Funds (DF). A feasibility study and the preliminary design has been carried out by NH, the latter being the subject of this report. To date the NH DF has delivered 160 cycling schemes across England and at the core of NH's work is 'safety'.
- 4.3. Currently, despite being a signed and designated cycle route (the National Cycle Network Route 2), it is formed of narrow shared use paths, poor cycle design and has gaps within the cycle infrastructure (ie it is not 'coherent').
- 4.4. The specific objectives of the proposed improvements are to:
 - Improve safety for cyclists, pedestrians and other road users.
 - Encourage healthy and active modes of travel – in line with the Government's 'Gear Change' vision for cycling and walking.
 - Support the West Sussex Walking and Cycling Strategy and Chichester City Local Cycling and Walking Infrastructure Plan.
 - Maintain the core function of the corridor as a local A road and diversion route for the A27.
- 4.5. NH, in partnership with WSCC, is developing this project via NH DF Programme to an approximate value of £5M. Subject to a successful outcome from the consultation NH will take the scheme forwards for detailed design and WSCC will make a financial contribution towards the improvements.
- 4.6. All new cycle routes need to meet the Government's guidance, Local Transport Note 1/20, which sets out five principles which represent the essential requirements to achieve more people travelling by cycle or on foot.
- 4.7. WSCC and NH public engagement state that, 'The design process has complied with the principles of LTN 1/20 throughout the route, with the aim of creating high-quality and inclusive walking and cycling infrastructure between Chichester and Emsworth. Shared use facilities have been proposed as a last resort only, on sections where physical and operational constraints have determined this.'
- 4.8. The proposals are to improve cycling and walking facilities along the A259 corridor between Chichester and Emsworth through a mixture of

infrastructure improvements that include segregated cycling and walking facilities, shared cycling and walking facilities, enhanced crossing points, junction amendments, highways widths alterations, tactile pavements and sections of reduced speed limits. Further descriptive detail is at Appendix 1 and annotated route section plans are at Appendix 2.

- 4.9. Highways constraints on some sections of the route mean that an idealised LTN1/20 design is not possible but, as outlined at para 4.7 above, WSCC and NH state that the design is LTN1/20 compliant.
- 4.10. The NH Engagement Report (Appendix 4) indicates support for the overall scheme is 59%, however, officers are aware of concern in some parts of the community, including the Chichester and District Cycle Forum (Cycle Forum) and the Bournes Forum Working Group for Chemroute consultation (Fishbourne, Bosham, Chidham and Hambrook and Southbourne Parish Councils). These groups published a joint response which includes alternative designs for parts of the route. Being a Highways engineering project, this report does not comment on the technical aspects of the proposal. However, given the concerns of some local groups, officers sought clarification from WSCC and NH with regards to the alternative design proposed by local communities. Both have confirmed that the highway has inadequate capacity to allow for the alternative design. An NH informed appraisal of the proposed alternative design is at Appendix 3.
- 4.11. The Council's key consideration is the strategic nature of the route with regards to corporate objectives; the emerging Local Plan and the future housing development on the A259 Chichester to Emsworth corridor, modal shift for air quality and the climate emergency. NH state in their 'A259 Chichester to Emsworth Walking and Cycling Improvements Engagement Report' (NHER) (see Appendix 4) report that 'The future housing development (on the A259 Chichester to Emsworth corridor) and increase in inhabitants is why the scheme is being proposed; to encourage modal shift for shorter journeys.'
- 4.12. WSCC will be making their indication as to whether they support the scheme in due course and that will be provided to Cabinet as soon as it is available.

5. Outcomes to be achieved

- 5.1. Overall, the scheme will provide improved and safer walking and cycling infrastructure on the A259 corridor and a coherent route from Chichester to Emsworth, noting that the design is compromised in places by the available highways' space.

6. Proposal

- 6.1. To consider the NH design proposals and the overall benefit of the scheme against the Environment Panel's resolution (para 9.4) and the

National Highways Engagement Report (NHER) (as at Appendix 4), with the intention of the Council indicating its support for the scheme.

- 6.2. The proposal is strongly congruent with the Council's adopted policies as expressed by the Corporate Plan Objectives:
- Support our communities:
 - Help our communities to be healthy and active, and
 - Maintain our built and natural environments to promote and maintain a positive sense of place:
 - Encourage sustainable living and
 - support the provision of essential infrastructure.
- 6.3. The adopted and emerging local plans take a balanced approach to the transport impacts of growth including promotion of active transport. The A259 corridor Chichester to Emsworth has seen development in recent years and is likely to see additional growth going forward, as indicated in the Council's published Preferred Approach Local Plan 2018 and work undertaken since then. The technical work underpinning the emerging local plan has an aim of securing a 5% modal shift away from the private car. Improvements in walking and cycling are essential if that model shift is to be achieved or exceeded and the NH proposals are well placed to provide a significant improvement to active travel facilities in a location which will continue to see pressure for development.

7. Alternatives considered

- 7.1. The first alternative would be not to indicate any Council position for the proposed scheme. The route, however, is important for Chichester District in the context of the emerging Local Plan and the likely development along the A259 corridor between Chichester and Emsworth. To remain silent would present an ambiguous position on such an important piece of infrastructure and NH have encouraged the Council to state its view. As such this 'alternative' is not appropriate.
- 7.2. A further alternative is to consider that the scheme is so compromised by the shared use sections and is not ambitious enough as the design is constrained to highways land only such that the Council indicates it's non-support for the scheme. It is not considered that this position would place adequate value on the improvements to the corridor that the scheme would bring. Such a position risks the loss of the ~£5M investment that the scheme represents. As such this position is not considered appropriate.
- 7.3. The alternative as proposed by the Environment Panel's resolution is to 'broadly support' the scheme with the exception of the shared-use sections of the scheme through the villages. However, NH indicate that there is no alternative to shared use through these sections of the route. Discussions with NH about the Environment Panel's resolution indicate that, if the Council formalises the Panel's resolution as its response to the scheme, this will pose a significant risk that the scheme does not progress in any form and the £5M funding would be spent outside of Chichester District. NH want to work in partnership with local authorities (LA) and if a

LA does not support a scheme then NH do not impose it on the LA. As such this position risks the scheme not progressing in any form and should not be pursued.

8. Resource and legal implications

8.1. There are no resource or legal implications for the Council.

9. Consultation

9.1. NH has engaged with a range of stakeholder groups to inform the development of the design through two interactive online workshops. More than 200 responses were recorded, and the feedback and suggestions gathered have been used to inform and refine the preliminary design.

9.2. WSCC and NH also carried out a public engagement exercise 22 July 2021 to 23 September 2021. (note NH has confirmed that they will receive the Council's response after the close of the public engagement).

9.3. NH has published its NHER document (see Appendix 4) which summarises the responses received, responds to a selection of those responses and provides a statistical analysis of the responses. The total online responses received were 436. For the overall scheme support was 59% and non-support was 34%. The consultation support for the sections of the path are summarised in the Table below:

Chemroute section description:	Supportive consultation responses (%)	Non-supportive consultation responses (%)
Emsworth to Southbourne	53	38
Southbourne to Nutbourne	60	32
Nutbourne to Bosham	60	32
Into Bosham	61	29
Bosham to Fishbourne	61	29
Into Fishbourne	58	32
Fishbourne to Chichester	59	30

9.4. The NH A259 proposals were considered by Environment Panel at its meeting on 15 October 2021. The Panel resolved:

- To indicate the Council's broad support for National Highways' proposed walking and cycling improvements to the A259 Chichester to Emsworth scheme with the exception of shared-use proposals through village centres which need further consideration.

10. Community impact and corporate risks

10.1. If the proposed scheme is delivered, then the community will benefit from overall improved walking and cycling facilities along the A259 corridor. This is by the provision of a safer route and a consistent and coherent route.

- 10.2. There are reputational risks in rejecting the scheme and avoiding inward investment and overall improvements in infrastructure to meet Local Plan, air quality and Climate Emergency objectives.

11. Other Implications

	Yes	No
Crime and Disorder		✓
Biodiversity and Climate Change Mitigation Enabling a greater number of journeys to be taken by walking and cycling and the related reduction use of liquid fuelled vehicles both reduce carbon emissions.	✓	
Human Rights and Equality Impact NH confirms that it has carried out an Equality Impact Assessment on the scheme. That assessment will form part of the Preliminary Design Report which will be publicly available for review in due course.	✓	
Safeguarding and Early Help		✓
General Data Protection Regulations (GDPR)		✓
Health and Wellbeing Active travel and reduced air pollution from less vehicle traffic have mental and physical health co-benefits.	✓	

12. Appendices

- 12.1. Appendix 1: Textual summary of NH proposals as presented on the public engagement webpage.
- 12.2. Appendix 2: Section plans of sections of the A259 Chichester to Emsworth proposed NH improvements to Walking and Cycling Infrastructure.
- 12.3. Appendix 3: NH informed appraisal of the alternative Chemroute design published by Chichester and District Cycle Forum (Cycle Forum), The Bournes Forum Working Group for Chemroute consultation (Fishbourne Parish, Bosham Parish Council, Chidham and Hambrook Parish Council and Southbourne Parish Council).
- 12.4. Appendix 4: NH A259 Chichester to Emsworth Walking and Cycling Improvements Engagement Report.