

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.