Response to Guildford Borough Council's Consultation on its Air Quality Action Plan for Compton Village dated May 2019.

1. This response has been prepared jointly by Compton Parish Council's Traffic Committee and by the owners of the three properties which are within the Air Quality Management Area (AQMA).

2. We are of the opinion that the analysis in GBC's Action Plan (AQAP) does not support the conclusion that banning right hand turns into Down Lane will bring the necessary improvements in air quality. We are very disappointed that the only recommendation is the "no right turn" into Down Lane which we proposed in our response to the original consultation in 2018 as an additional measure which could make a small difference. On its own, we do not see this measure making a sufficient difference to reduce the pollution below the targeted level as we explain in this response.

3. The town centre transport scheme for Guildford is referenced, but is there any evidence that this will positively impact Compton? Is it not possible that pushing traffic out of the town centre, might in fact increase traffic in the outlying villages such as Compton? Better public transport is mentioned as a key component of GBC's report and transport scheme, but this is unlikely to affect Compton which has just one bus service which needs subsidising.

4. Pollution in the AQMA

   4.1 How pollution levels respond to a reduction in vehicle numbers is highly relevant to the consideration of how to improve air quality. As the data show, readings during the 3 months the bridge was closed (late April to late July 2018) showed that May and June were above the 2017 levels and it was only July which showed a reduction below 40ug. As the volume of traffic dropped substantially during the closure period and there were virtually no lorries at all, we wonder whether GBC is totally convinced that the pollution in the AQMA does come from traffic passing through Compton and not to some extent from another source such as being blown by the wind from the nearby A3.

   4.2 Some of the alleged general improvement in air quality seen during the whole of 2018 may be due to the bridge closure causing reduced traffic for several months of the year. The fact this is not even mentioned in the report is worrying. For example, there is no mention whether there have been adjustments to the 2018 figures to take account of this. We would have expected to see the pollution levels for 2018 split into different periods. It is therefore not clear if there is really a general gradual reduction over time as claimed in the last paragraph of page 5. This is highly relevant to the assumption towards the end of the report that levels will improve gradually even if no action is taken.

4.3 The decline in NO_2 (page 5) is undoubtedly down to a slight drop in general traffic volume over the last 3 years, particularly going northbound. This is supported by Compton's VAS results but the reasons for this are unknown and could be due to the number of factors, including incidents, road works, bridge maintenance issues, leading to traffic taking diversions or alternative routes). However, the correlation between reduction in volume and reduction in NO_2 as a solution has not been explored.

4.4 We have to question, therefore, whether the data has been analysed properly in light of the absence of any reference to the bridge closure and also failure to consider how the pollution levels responded to this, including considering whether the data suggest other possible contributory causes.

5. Data on which modelling is based

5.1 The ANPR study was carried out on the 2nd working day after the bridge reopened and on a date which was in the school holidays. It cannot therefore be relied on as definitively being representative of the traffic levels and mix through Compton, as many drivers had changed their habits and HGV drivers had been diverted, such that it is likely to have taken a week or two for normal levels and mix of traffic to re-establish itself.

5.2 We also note that the ANPR data (shown in Figure C.3 at page 21) shows no southbound traffic at all after 7.30pm (in contrast to continued traffic going northbound). This cannot be right and indicates either a fault in the monitoring equipment or some other event which means that the reliability of the data has to be questioned.

5.3 These question marks over the ANPR data throw doubt on all the other analysis and forward-modelling in the report. We would recommend that a second ANPR study be undertaken on a weekday during term time.

5.4 We also query the marked reduction in NO_2 levels in 2017 shown by the monitoring equipment (summarised in Table 1 on page 6). Higher levels, more akin to those measured during 2016, reappear in 2018. Why would the mean levels at Little Cottage decline from 50 parts in 2016 to 40 parts in 2017 and rise again to 46 in 2018? This requires investigation as to whether there has been any change in the sampling process and whether the figures can be relied upon.

5.5 It is striking that nowhere in the AQAP is the bridge closure specifically referred to - it is only mentioned once in the context of the report's summary of the comments received last year from Compton Parish Council. This is a striking omission and must throw into doubt the reliability of the entire report.

6. Accuracy of model

Further concerns arise regarding the accuracy of the model (which may be due, in

whole or part, to the concerns regarding the underlying data covered in 5 above). It is clear from the explanation on pages 27 and 28 that when the model was first used to try to replicate the actual results for all monitoring sites, the correct results were not achieved for all locations and a decision was made therefore to apply a "conservative" multiplication factor based on the C4 receptor alone. However, this inability to replicate the results across all locations suggests that there could be an error in the approach (which may be due to the flawed data) and therefore the forward modelling may also be unreliable in ways unanticipated.

7. <u>Analysis does not support No Right turn proposal</u>
The analysis in the AQAP does not support the conclusion that banning right hand turns into Down Lane will achieve the required improvements.

7.1 The queuing study undertaken was inconclusive as to whether there was in fact a queuing problem caused by the right hand turns into Down Lane (page 26). As we have advised you, there is a queuing problem, but it is nothing like the one hour the AQAP hypothesises. If we had been asked, we would have suggested that an average of no more than 30 minutes per day was the reality for traffic waiting to turn right into Down Lane. However, queues appear in Compton for two reasons and it is the second one which is more of a problem and banning a right turn into Down Lane will have no impact on this type of queue. These queues are due to congestion caused by the loop that is the A31, A3 and B3000.

They can be due, firstly, to a hold up at the roundabout at the top of the slipway from Compton towards the A3, because of the volume of traffic coming across the A3 and turning right onto the A3 towards Milford and also into Priorsfield Road. This resulting inability of traffic to join the roundabout causes frequent queues back into Compton.

The second reason is due to a build-up of traffic on Puttenham Heath Road heading towards Puttenham. The inability to turn left from the A3 northbound onto the A31 causes traffic to use the B3000 Puttenham Heath Road and the build-up in traffic at peak times results from the difficulty this traffic experiences in getting access onto the A31 from the B3000 at Puttenham. This quickly leads to the roundabouts on the A3 being blocked, leading to tailbacks into Compton.

Timed print screens from Google Maps were taken which show that an accident at a peak time at the point on the A31 close to the new proposed access to the Blackwell Farm development, caused complete gridlock in Compton in under 8 minutes. The same level of congestion on this loop is shown as a "typical traffic" scenario (Fig 1) which occurs frequently at peak times. Fig 2 is a close up of Fig 1 to include B roads and Fig 3 is a snapshot at 5pm showing that the build-up of traffic at the roundabout has caused congestion in Compton.

Fig 1

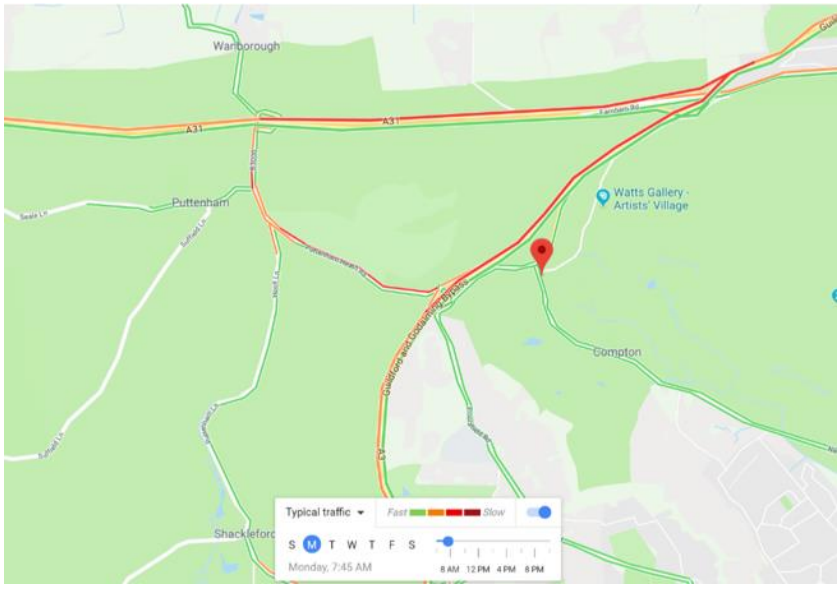


Fig 2

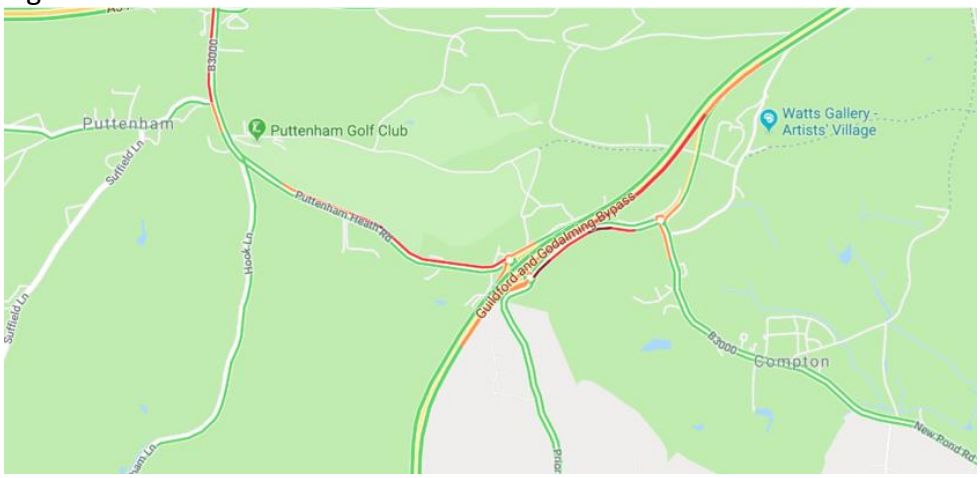
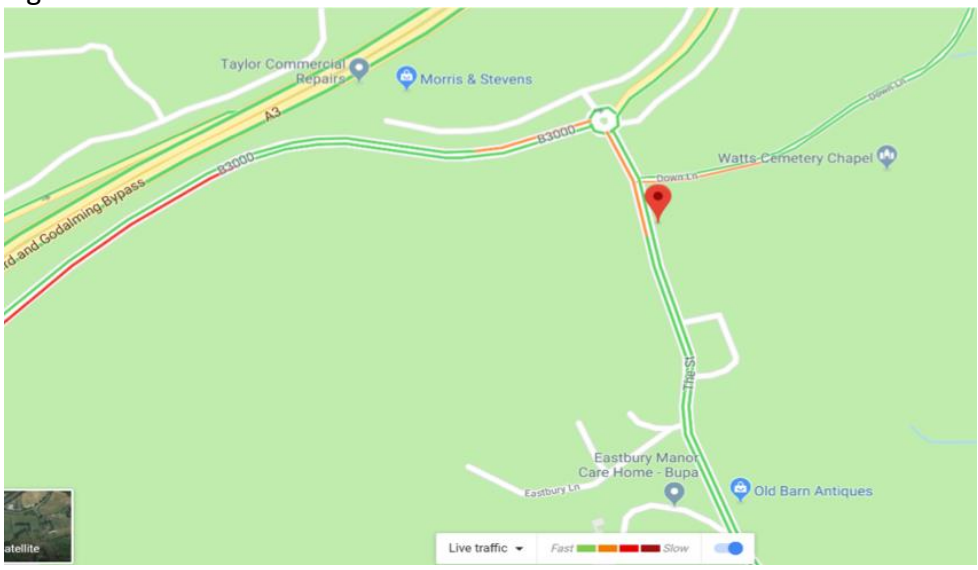


Fig 3



7.2 The data in Table 3 (page 12) say that banning right turns is targeted only to reduce pollution by 1 mcg per square metre whereas on page 6, third paragraph, it states that there is a need to reduce emission levels by 14.5 mcg per square metre. It is therefore clear from the figures in the AQAP that the only measure proposed is wholly insufficient - and that measure itself is based on a hypothetical queue which, as explained in 7.1, is probably double the reality.

7.3 In order to achieve full compliance, the AQAP assumes that there will be an additional, independent, reduction in the number of diesel cars using the road. This has been done by postulating future reductions in diesel emissions caused by changes over time in the composition of the vehicle fleet using the road (page 28) to support the alleged reduction to within legal limits. However, no account has been taken of potential increases in traffic through the village due to Guildford's earmarked development schemes, particularly Blackwell Farm which is in the recently adopted Local Plan. The only reference in the AQAP to the effect of future development is an observation on page 13 (in response to an earlier Compton Parish Council comment), where GBC state that they will have little control and that this would need to be discussed with Surrey Highways. But this is factually incorrect, as GBC will have control over future increases in vehicles because the type of decisions that will affect Compton will largely be made by GBC planning department (such as Blackwell Farm or changes in the Guildford gyratory system). This important point is not discussed anywhere else in the document. Just because it is difficult to predict future traffic increases does not mean that they should be ignored. There must surely be data on the growth in traffic numbers over time from which one can make predictions. It is very likely that traffic will increase and the effect of this ought to be modelled, particularly so that the effects on pollution can be taken into account when considering whether to approve future planning applications.

8. <u>Comments on other measures discounted by GBC</u>.

8.1 On page 6, the report says that the priorities for the action plan include reduction of traffic flow and associated queuing and congestion. However, GBC have not put forward any proposals to reduce the number of vehicles using the Street and only very minor measures to deal with queuing (which as noted above do not address the main cause of the queues).

8.2 In relation to Option 1 from the previous consultation (banning HGVs): even if these represent a small proportion of overall traffic, according to the figures quoted in the AQAP (although see paras 4 and 5 above regarding our concerns on their reliability), it is only necessary to reduce the emissions by 20%, not 100%, in order to meet the target, so banning HGVs could contribute significantly to this total. In addition, the proportion of HGVs may

be underestimated due to the timing of the ANPR survey so close to the reopening of the road after the bridge works.

8.3 What is the basis for the assumption by SCC (page 14) that moving some traffic elsewhere would also move the problem elsewhere? The problem is partly caused by traffic volume but also by factors which may not apply elsewhere, such as the proximity of houses to the road and topography, as Compton lies in a dip, close to the A3.

8.4 In relation to option 2 (20mph zone), it is not clear whether the rationale behind this proposal has been fully appreciated - namely that there is currently a high proportion of speeding, accelerating and braking traffic in this section of the road. Braking in particular adds to pollution levels. The intention behind the proposal of an enforced 20mph speed limit was to ensure a steady speed rather than the marked changes of speed currently taking place and also to regulate the traffic flow to reduce queuing at the roundabout. This was behind our proposal for Average Speed Cameras (ASCs) which, if properly enforced, would result in a steady speed and therefore reduced pollution. Hopefully, the police will review their current decision which is only to take accidents into account in determining whether ASCs are appropriate, as ASCs would also stop the chronic speeding in Compton, estimated to be more than 80% of the traffic passing through the village.

8.5 We are also concerned by the statement on page 24, section C4, that discussions with Surrey "have shown that there are no feasible mechanisms for reducing the number of diesel cars and LGVs". The question has to be asked as to whether Surrey could be inappropriately prioritising the flow of traffic over meeting air pollution targets. This is in stark contrast to London where it has been recognised that to address air quality, the number of polluting vehicles needs to be decreased.

8.6 Responses to Compton Parish Council's earlier suggestions (page 13) stated that there would be a follow up with Highways England to discuss signage taking traffic destined for Godalming off the A3 onto the B3000. Highways England looked at this several years ago and said the signage was historic and that they would change it. However, we understand that SCC prevented this from happening. In the light of the AQMA and the additional developments proposed, we believe that a review of this decision is necessary.

SCC's responses indicate that they do not support re-routing freight on the basis that the alternative route is longer. However, Google Maps show that the route to the car park on Flambard Way, Godalming via the B3000 is 7.5 miles and takes 17 minutes by car. The route via the A3 and Milford is 5.4 miles and takes 9 minutes. See Fig 4 and Fig 5.

Removing A3 signage and altering 'sat nav' systems for lorries would seem to be an easy low-cost way to improve the situation.

Fig 4

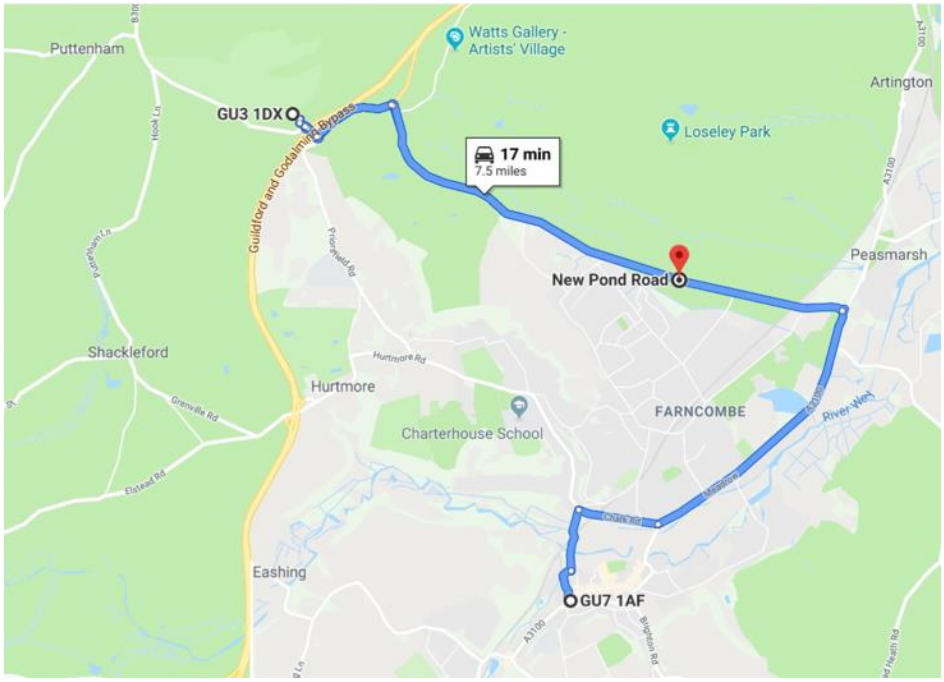
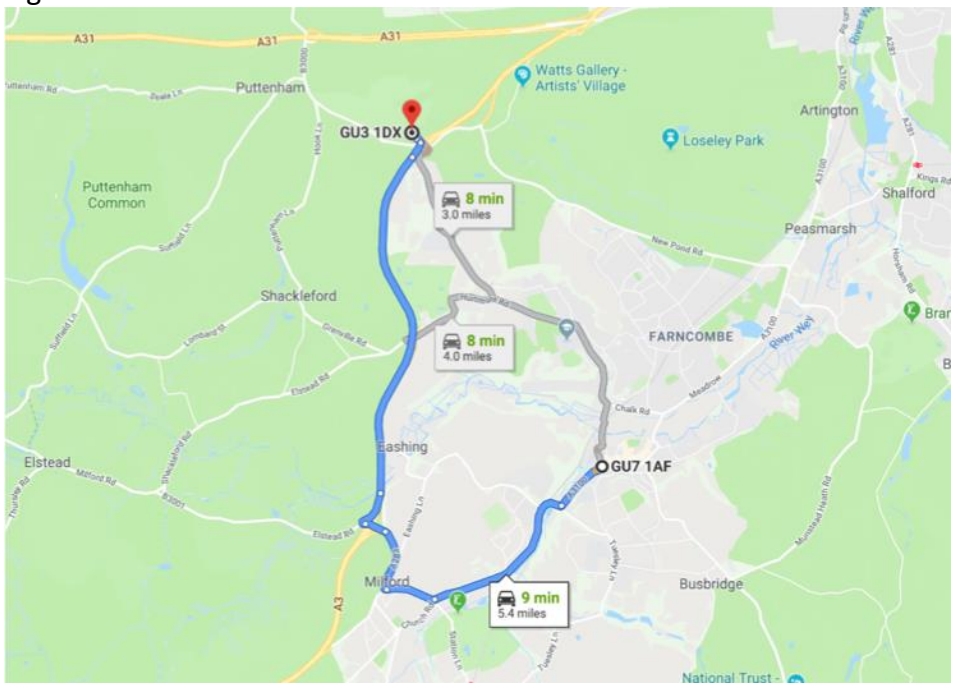


Fig 5



9. <u>Ongoing Monitoring</u>
   We are a little confused about future monitoring. The report says (page i) that the

AQAP outlines the action to be taken to improve air quality between 2019 and 2020 and on page ii, that it will be subject to an annual review, appraisal of progress and reporting to the relevant statutory committee. But a few pages later (page 1), the report says that the Plan will be reviewed every five years at the latest and progress reported annually. Is this a set plan for 5 years, or if continued monitoring shows that the postulated improvements in air quality have not been seen, will further action be taken?

10. Summary

10.1 We believe the methodology is flawed in coming to the conclusion that banning right turns into Down Lane will solve the problem of the AQMA.

10.2 No account is taken of proposed new developments in the area (eg Blackwell Farm) and the increased traffic this will generate.

10.3 Removing A3 signage advising Godalming-bound traffic to use the B3000 and altering sat nav systems for lorries would seem to be a low-cost way to improve the situation.

10.4 It is implicit in the GBC report that the only guaranteed way to reduce emissions is to reduce the number of vehicles. This is clearly missing from any proposed solution.

10.5 We believe that ASCs should be part of the solution.

23 May 2019

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