

Cheltenham Borough Council

Cabinet – 23 May 2023

Air Quality Action Plan

Accountable member:

Cabinet Member for Customer and Regulatory Services, Cllr Martin Horwood

Accountable officer:

Head of Public Protection, Louis Krog

Accountable scrutiny committee:

Cabinet

Ward(s) affected:

All

Key/Significant Decision:

Yes

Climate Change Impact Assessment carried out 20th March 2023

Executive summary:

This Air Quality Action Plans (AQAP) outline the action we will take across the Borough to improve air quality. This fulfils the authority's statutory responsibilities on local air quality management under part IV of the Environment Act 1995 (as amended in 2021). Our local air quality monitoring indicated levels of Nitrogen Dioxide (NO₂) exceeded the annual mean objective in one geographical area. We declared this area an Air Quality Management Area (AQMA) in 2020. It extends from the junction of Gloucester Road, Tewkesbury Road and High Street along Poole Way to Swindon Road to the junction of St George's Street. The AQAPs outline the actions required to improve air quality across the Borough and specifically what we will do to reduce levels of NO₂ within the AQMA. The AQAPs, once approved, will be submitted to the Department for Environment, Food and Rural Affairs (Defra) for their appraisal. The authority has developed a collaborative approach, reflecting the need for upper and lower tier authorities and other key partners to work together to reduce pollution and improve air quality. The AQAPs include initiatives which can be delivered using existing knowledge and some ambitious initiatives which will require further research and funding to implement. Many of the actions within the report are not the responsibility of this Authority, many lie with Gloucestershire County Council for example, as the transport authority and we will

continue to work with them and our partners for effective delivery.

Recommendations:

That Cabinet:

- 1. Approve the draft Air Quality Action Plan attached at Appendix 3 of this report.**
 - 2. Approve the Bureau Veritas Air Quality Action Plan at Appendix 4 of this report**
 - 3. Approve the Bureau Veritas Modelling Study at Appendix 5 of this report**
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1. Implications

1.1. Financial implications

Approval has been sought from the Director of Public Health that the residual COMF (Covid Management Funding) can be used to fund the proposed Air Quality fixed term contract role.

All other expenditure will be covered by existing base budget in the REG012 (Air Quality) cost centre.

Signed off by: Andy Taylor, Principal Commercial Accountant,
andrew.taylor@cheltenham.gov.uk

1.2. Legal implications

Where, as a result of an air quality review, it appears that any air quality standards or objectives are not being achieved, or are not likely within the relevant period to be achieved, within the area of a local authority, the local authority shall by order designate this as an AQMA. Any changes to that designated area, following a subsequent air quality review, shall require an amendment to the designation order. Further legal advice should be requested on the statutory process for any amendments required.

There is also a legal requirement under the Environment Act 1995 for a local authority to produce an AQAP targeted at meeting air quality objectives where an AQMA has been declared.

A local authority is required to review and revise its AQAP in order to seek to achieve the prescribed air quality objectives. When considering revisions to its AQAP, local authorities are required to consult widely. In considering the report and the draft revised AQAP, Cabinet is required to have regard to the consultation responses and the proposed revisions to the AQAP, in addition to its public sector equality duty (PSED) under Section 149 of the Equality Act 2010. This duty provides that the Council must, when exercising its functions, have due regard to the need to eliminate discrimination, harassment and

victimisation and other prohibited conduct and to advance equality of opportunity and foster good relations between those who share a 'protected characteristic'.

Any alleged failure to conduct a lawful consultation, or to have proper regard to the responses received, or the Council's PSED when adopting the AQAP, may be subject to a legal challenge.

One Legal

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Email: legalservices@onelegal.org.uk

1.3. Environmental and climate change implications

The aim is to improve air quality within the Borough and in particular within the AQMA. The actions set out in this plan aim amongst other things to reduce vehicles on the road, encourage the use of cleaner fuels and reduce burning of fossil fuels in domestic settings. These actions ultimately lead to greenhouse gas reduction. See Climate change impact assessment appendix ii

Signed off by: Laura Tapping Climate Emergency Programme Officer
laura.tapping@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Working with residents, communities and businesses to help make Cheltenham #netzero by 2030
- Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity
- Being a more modern, efficient and financially sustainable council

3.5 Promoting equality and reducing discrimination

NA

3.6 Performance management – monitoring and review

The authority will submit, as required, an annual status report¹ to Defra outlining progress in achieving reductions in concentrations of emissions below the air quality objectives (see page 5 of the AQAP for information on the air quality objectives). We will have regard to any comments or required improvements following the appraisal by Defra.

The action plan will be reviewed every 5 years.

Overview & Scrutiny will be updated periodically on progress.

Progress will be reported to the Gloucestershire County Council All Hazards Protection Board as part of the Gloucestershire Air Quality and Health Partnership as detailed in Gloucestershire Air Quality and Health Strategy² (AQHS)

4. Background

- 2.1 Poor air quality is associated with many adverse health effects³ and adverse effects on crops and vegetation. The authority is committed to maintaining high levels of air quality as part of its legal and wider responsibilities.
- 2.2 The Environment Act 1995 (as amended) requires the authority to review air quality within our District. Where air quality objectives are not met, or are likely to be not met, the authority must identify the location and designate it an AQMA. We are then required to co-ordinate the production of a plan to a prescribed Defra format including reduction measures and time scales.
- 2.3 This plan includes a general overview of our wider commitments to improving air quality within the Borough (Appendix iii) and a specific action plan detailing targeted reduction measures within the declared AQMA (Appendix iv) as required to fulfil our statutory duties under Part VI of the Environment Act 1995 (as amended).
- 2.4 It is also supported by a detailed modelling study (Appendix v) to increase the Councils understanding of pollutants of concern within Cheltenham, which in turn provides the technical input into the air quality action plans.
- 2.5 These plans will complement and not duplicate a number of ongoing Council policies such as our Climate Emergency Action Plan⁴.
- 2.6 Environmental Health Officers (EHOs) within the Environmental Health team monitor air quality using a network of 46 diffusion tubes sites across the Borough including one automatic continuous site with co-located triplicate diffusion tubes. Results in 2019 showed exceedances of the NO₂ annual mean air quality objective of 40µg/m³ within a small area of the Borough. Exceedance of NO₂ resulted in the declaration of an AQMA covering the affected area.
- 2.7 In September 2022, Defra confirmed that our monitoring calculations were accurate for all sources and pollutants. In addition to passive diffusion monitoring, 9 mesh pods around the Borough monitor particulate matter (PM), namely PM_{2.5} and PM₁₀. Particulate matter consists of a variety of compounds and materials, some of which are toxic and due to the small size (2.5 and 10 micrometres respectively), have a serious impact on health. Detailed modelling assessments predicted PM_{2.5} concentrations to be below the current annual objective of 20ug/m³. The Environmental Targets (Fine Particulate Matter)(England) Regulations 2022 set a target of annual mean concentration of PM_{2.5} in ambient air to be equal or less than 10µg/m³ by December 2040 and, a target reduction in population exposure by 2040. 2 Defra approved monitors were purchased and installed in 2022 to monitor PM and enable us to calibrate existing mesh pods. Data from these units will be published shortly.

5. Reasons for recommendations

- 3.1 This will ensure we meet our statutory obligations under the Environment Act 1995 (as amended) and the Local Air Quality Management Framework⁵.

6. Alternative options considered

- 4.1 Cabinet may choose to amend the proposed air quality action plan in accordance with Sec 83 of the Act. This is not recommended, as any significant changes to the plan may necessitate further consultation. This will further delay the submission to Defra for their appraisal beyond the

required date of 31st May 2023. Any unjustified delay may be subject to a Section 85 Ministerial Direction to the Chief Executive.

7. Consultation and feedback

- 5.1 A consultation exercise was carried out in line with the Cabinet Office consultation principle guidelines. The consultation ran from 27th October 2022 until 8th December 2022.
- 5.2 The documents were available on our website and citizen space consultation portal 'have your say' with hard copies available on request. The consultation was promoted through a targeted media release. In addition, officers shared the consultation with key statutory consultees and they disseminated it within their organisations.
- 5.3 In total, 17 responses were received from the online portal and 2 in-depth responses were received via email from the Clean Air Cheltenham Group and the Cheltenham and Tewkesbury Cycling campaign. Comments from statutory consultees were gathered over a period of time via the Steering group and individual conversations and are reflected in the comments column on page 17 of Appendix iv. The Steering group was established early in the process to drive forward the delivery of the AQAP. It consisted of Officers from the authority and others who have a statutory responsibility, have an impact on air quality or who may have an interest in air quality.
- 5.4 Of the 17 respondents, 2 said 'yes' the plan was sufficient to tackle poor air quality and 16 said 'no'. The comments received and officer responses are summarised in Appendix v. It was deemed that the comments did not require a material change to the content of the action plan and so no additional consultation is required. See the officer comments in Appendix v for more detail to support this.

8. Key risks

- 6.1 Delayed submission of the AQAP beyond 31st May 2023 for appraisal by Defra may result in a Ministerial direction. This risk will be removed if the plan is adopted and submitted within the required deadline.
 - 6.2 Defra may deem the plan, or parts of it, ineffective at controlling NO_x and require further actions to be taken. This risk has been minimised by seeking external expert advice to formulate a technical action plan and data modelling aimed at targeting NO_x reduction.
 - 6.3 This authority does not have the statutory powers and/or resources to deliver the AQAP by itself. It will require input, resources and leadership from Gloucestershire County Council, NHS integrated care partners, businesses and other organisations to deliver the action plan. If partners are unable to contribute and play their part, there is a risk that aspects of the AQPA will not be deliverable. The Authority has mitigated in part by repurposing some of the existing Contain Outbreak Management Funding (COMF) from Gloucestershire County Council with the permission of the Director of Public Health as part of reducing health inequalities following Covid 19.
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Report author:

Louis Krog, Head of Public Protection

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Appendices:

- i. Risk Assessment (see below)
- ii. Climate Change Impact Assessment (see below)
- iii. Draft Air Quality Action Plan, May 2023
- iv. Air Quality Action Plan, Bureau Veritas, September 2022
- v. Detailed Modelling Study, Bureau Veritas, August 2022
- vi. Summary of responses & officer comment

Background information:

1. [Cheltenham Borough Council Air Quality Annual Status Report 2022](#)
2. [Gloucestershire Air Quality and Health Strategy](#)
3. [Chief Medical Officer Annual Report Air Quality 2022](#)
4. [Climate Emergency Action Plan - Pathway to Net Zero](#)
5. [Local Air Quality Management PG 22](#)
6. [Connecting Cheltenham- Strategy Report](#)

Appendix i: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
1	Risk of delayed submission of plan to Defra. This may result in a Sec 85 Ministerial direction to the Chief Executive	Head of Public Protection.	4	2	8	Remove	Risk is removed if the plan is approved by Cabinet or extension to deadline approved by Defra. Extensions have already been given and no further extension should be requested beyond 31/05/23	Cabinet	31/5/23
2	Following submission Defra may require additional or revised measures requiring further work	Head of Public Protection.	3	1	3	Mitigate	Risk mitigated. The detailed plan and modelling has been prepared in conjunction with external experts Bureau Veritas to ensure compliance with statutory policy guidance and technical guidance issued by Defra. The plan was updated following changes introduced by the	Bernadette Reed	31/05/23

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
							Environment Act to change the goal from being 'in pursuit of' achievements to ensuring air quality objectives are met.		
3	This authority does not have the statutory powers and/or resources to deliver the AQAP by itself. It will require input, resources and leadership from Gloucestershire County Council, NHS, businesses and other organisations to deliver the action plan. If partners are unable to contribute and play their part, there is a risk that aspects of the AQPA will not be deliverable.	Head of Public Protection.	4	3	12	Mitigate/accepted	Risk mitigated and or accepted. CBC are formulating a business case for a dedicated Air Quality Officer as part of the phase 2 reorganization. We are also working with the Director of Public Health following a successful business case for COMF funding for a wider air quality initiative in schools recognizing that in those exposed to poor air quality, cases of Covid 19 may results in more		

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
							hospital admissions and worse outcomes		

Appendix ii Climate Impact Assessment

Air Quality Action Plan



ENVIRONMENTAL	Scores	Action	Justification
GHGs	8	No action required	Key focus on sustainable modes of transport and behavioural change. Review of smoke control areas to reduce the burning of wood and fossil fuels.
Air quality	8	No action required	The air quality action plan aims to identify and implement measures which will reduce emissions of pollutants of concern which have an effect on air quality recognising the wider benefits of measures which extend beyond the air quality management area.
Sustainable Transport	8	No action required	This plan has been formulated as part of a steering group with County Council colleagues within strategic transport and sustainability.
Biodiversity	4	No action required	poor air quality has a negative impact not only on health but on crop, vegetation and associated wildlife.
Land use change	4	No action required	commitment to developing SDP for air quality for use as statutory consultees for development/planning
Soil and waterway	0	No action required.	0
Climate Change Adaptation	0	No action required.	0
Energy Use	0	No action required.	0
Waste	0	No action required.	0
Sustainable Materials	0	No action required.	0

SOCIAL	Scores	Action	Justification
Food	1	No action required	0
Health	0	No action required.	Chief medical officers air quality report outlines health effects of poor air quality. Action plan aims to improve air quality and will realise associated benefits of active travel
Housing	1	No action required	0
Education	1	No action required	0
Community	0	No action required.	main focus is to improve air quality and this is via a number of measures.
Culture	1	No action required	0
Accessibility	1	No action required	0
Local Economy and Jobs	1	No action required	0
Safety	1	No action required	0
Democratic Voice	0	No action required.	the plan went to consultation as required by law. Comments were reviewed and actioned where appropriate. Further consultation would only arise following declaration of a new or revised air quality management area.
Equity	1	No action required	0

Appendix iii Draft Air Quality Action Plan (see separate document)

Appendix iv Air quality Action plan Bureau verita Sep 2022 (see separate document)

Appendix v Detailed modelling study Bureau veritas Aug 2022 (see separate document)

Appendix vi consultation responses:

Cheltenham Borough Council Air Quality Action Plan

Consultation responses

	Feed Back Received	Officer Comments
1	Air quality is not good in Cheltenham Traffic is bad across the town	Monitoring has highlighted 1 hotspot where NO ₂ is exceeded and the air quality action plan to improve air quality specifically targets this area. We recognize the emphasis on PM control.
2	The traffic in Cheltenham is shocking. Moving around the town difficult. Bus fares are too expensive to incentivise people to use buses and leave cars at home. CBC needs to do much more. We have no bus station - over 25 yrs ago old black and white demolished and turned into a car park ! Royal well needs more facilities. Cheltenham is a festival town yet no decent facilities re public transport. All of this poor planning contributes to situation our town is now in	The Borough's vision for sustainable travel is detailed in the Connecting Cheltenham report. All levels of Local government are expected to commit to taking action and The Environment Act 2021 reinforces that responsibility for solutions to poor air quality is shared across local government. Cheltenham Borough Council have developed a collaborative approach reflecting the need for upper and lower tiers and key partners to work together to reduce pollution and improve air quality. GCC have produced the Local Transport plan to address this and we continue to work with them.
3	Energy crisis leading to more wood burning stoves used. These are particularly polluting. What mitigation actions are we considering for these? How are we enforcing the recent ban on burning green wood? The most polluted junction I know is the bridge over the train tracks where Gloucester Road meets the A40. Average levels are not representative of the harmful photochemical smog there on a sunny and still day. This is a major transit route for Dean Close and Bourneside Schools with hundreds of children a day crossing the junction. It is also the main commuter cycle route into/from town. Please set up some monitoring, no results are included in this report.	Technically the action plan only has to deal with reducing pollutants within the declared air quality management area as this is where the identified problem requires specific targeted action within a defined time. NO ₂ is the pollutant causing the exceedance, hence the declared AQMA. Wood burning stoves are not the main contributor to the NO ₂ problem but as part of a wider action plan, we acknowledge the effect that wood burning stoves have on the levels of PMs and so have now included reference to this. Monitoring is carried out in this vicinity along the A40 and locations can

		be viewed on our website and within the technical reports.
4	Lacks concrete action to cut down on or even better prevent use of log burners for domestic heating. These have been shown to be a major cause air pollution in urban areas, they are completely unnecessary and their use is only going to increase as people try and save on heating bills - at the further expense of air quality in residential areas.	See comments at 3 above
5	Too many cars and not enough 'good' cycle provision.	More specific information would enable comments but cycling provision is referenced in this plan and in supporting documents
6	I believe there is an option to work with the county council and have a county approach to traffic and clean air. Consider changing bus lanes into green lanes. Self fund for green vehicles to pay for a green plate to enable use of the green lane. Approach can be for a 5 year green lane license. Adjust central areas of town into green zones and make some spaces in car parks free for green plates. Make county travel aspirational.	The new Environment Act strengthens the statutory responsibly for upper and lower tier organisations to work together and this will be reflected as we work through the actions. These initiatives such as green plates will form part of a wider conversation with GCC as with CAZ
7	We need to build a bypass, so that traffic is taken away from the town, not driven through, The bus service is a failure The cycle path is a failure, we keep building houses, but the roads stay the same, grid lock is on the horizon, without a bypass	The Cheltenham plan in conjunction with the JCS ensures development is assessed in terms of traffic and travel patterns. Comments regarding a bypass will be discussed with GCC and incorporated into any revision if appropriate.
8	Although transport is clearly a major source of air pollution the action plan only focuses on this. It ignores the high levels of pollution created by the generators used to power the events held in Montpellier and Imperial Gardens. The Ice Rink in 2021/22 consumed 34,540 litres of fuel, the Literature Festival 14,004. Add in all the other events and you are looking at in excess of 70,000 litres. How many thousand car journeys through Cheltenham would you need to consume 70k litres? How many tonnes of CO2 are emitted, how much NOx and Particulate pollution? It is not just the air pollution but the loss of access to these important green spaces. These events are all due to CBC policies and are totally in their control. There are alternative ways to deliver these events but I do not see anything in the Air Quality Action Plan to address this. The air quality monitoring programme in Cheltenham does not cover the sites where these events take place. This is significant air pollution and both Imperial and Montpellier Gardens should be monitored.	Our climate emergency impact assessment tool has been introduced for key decisions and policies. This will highlight activities of concern regarding air pollution. We are also working with Chelt Zero, Cheltenham Festival, Climate Team and our Green Space Team to promote the 'green events code for event organisers. We review our monitoring commitments regularly and will consider the request of specific monitoring sites where appropriate.
9	Current WHO guidelines demand air quality standards beyond CBC targets and indicate most areas of Cheltenham beyond the AQAA are unsatisfactory levels of pm2.5 and nitrous oxides.	The WHO targets are guidelines. They have recently revised the level for NO ₂ from 40 to 10µg/m ³ and for PM2.5 from 10µg/m ³ to 5 µg/m ³ to reflect that there is no 'safe' level of pollution. Most areas would exceed this level and will be difficult to achieve without substantial investment and commitment but they are levels we would aspire to. New regulations require the UK to achieve as a minimum annual mean levels of PM 2.5 of 10µg/m ³ by 2040
10	A lot of the plans involve 'encouraging' various things such as taxis not idling. It is naive to expect that encouragement will do anything on a large scale. The biggest issue in my opinion is that there is no real plan for alternatives to car.	It is recognised that some actions are more tangible than others. Some are enforceable by law and some are not. Encouragement can have more sustained behaviour

	<p>Cheltenham is uniquely placed to be a very car free city because of its size but the infrastructure is so incredibly poor. I would love to cycle locally but it is so dangerous. So many of the roads are narrow and so parked up with cars that there is really only room for traffic in one direction but are still 2 way. In particular, St Paul's road comes to mind. This makes cyclist incredibly vulnerable as cars try to squeeze past. There are very few proper cycle lanes and to encourage people to feel safe enough to cycle you need proper, segregated lanes. There are some appalling example of cycling infrastructure across Cheltenham including a symbol just being painted on the road, or cycle lanes just disappearing at narrow pinch points. The roads are also full of potholes - unpleasant in a car but potentially lethal on a bike.</p> <p>The honeybourne line is always full of cyclists (and not just leisure cyclists but people using It as a means of transport) which just goes to show that is safe cycle infrastructure is there people will use it.</p> <p>Even for pedestrians most of the pavements are horrible to walk on. I am near this high pollution zone and on the pavements Cars are often parked half on/half off pavements or they are filled with bins. The pavements themselves are filled with cracks or on such a slope that no wheelchair or pram could safely use them.</p> <p>The report clearly identifies the overwhelming issue is from transport yet there are no meaningful solutions for this.</p> <p>You need to have a proper plan for cycling to be a viable alternative, waking to be pleasant and reliable and regular bus services for those not able to walk/cycle.</p>	<p>change. Enforcement in most cases would always adopt a graduated approach starting with education and encouragement. GCC road safety policy was out for consultation for 8 weeks from 18th July 2022 to 11 September 2022. The long-term aspiration was 'vision zero' to aspire to stop all traffic fatalities and serious injuries by 2050, increasing safe and healthy travel for all aiming to increase safety for cycling. We will continue to work with County who have responsibility for pavements and on street parking responsibilities. We will continue to work with GCC on active travel.</p>
<p>11</p>	<p>Royal Mail is proud to deliver a one-price-goes-anywhere universal postal service to residents and businesses in Cheltenham, connecting our customers with the rest of the country. We collect and deliver letters and parcels to every address across the UK and have launched – and are continuing to develop – new services, such as our parcel collection service 'Parcel Collect', Sunday parcel deliveries and the expansion of our pharmaceutical delivery services. This requires driving in Cheltenham, including in the proposed Clean Air Zone (CAZ), every day.</p> <p>As part of this, we recognise the impact we have on the environment and take our responsibilities to the communities we serve extremely seriously. As a result, Royal Mail recently launched an ambitious new environment plan, Steps to Zero, which includes a long term target to bring down the average carbon emissions per parcel we deliver in the UK by c.75%, from 205gCO₂e today to 50gCO₂e. We have also brought forward our net zero target by a decade to 2040. We are committing to near term emissions targets in line with climate science, reducing absolute Scope 1 and 2 greenhouse gas emissions by 25% by 2025/26 and Scope 3 emissions by 25% by 2030, from a 2020/1 base year.</p> <p>Royal Mail is unique in that, unlike other parcel operators, the majority of our last mile deliveries in Cheltenham town involve an element of 'on foot' transportation – either our postmen and women use a high-capacity trolley for their entire route, or they use a combination of on foot delivery with some van-based transport that we call "park and loop". This helps to keep emissions low and reduce congestion with fewer vehicles on the road.</p>	<p>We thank Royal Mail for their update and continued engagement regarding their business operations and the potential impact within the AQMA. No CAZ has yet been proposed. It is an initiative which has been implemented in some urban areas where the data determines it is necessary and further discussions and evaluation by GCC will be necessary.</p>

	<p>Based on our own analysis, we offer the lowest reported CO2 per parcel of any major UK delivery operator.</p> <p>Royal Mail is working hard to transform its vehicles to low or zero emission standards. We now have over 3,700 EVs across over 100 sites in the UK. We have made a commitment to increasing this to c.5,000 EVs with an investment of £12.5m in charging infrastructure in 2022/23. We continue to replace diesel vans with electric vans to level-up our operation and to help improve air quality in local communities.</p> <p>Delivering the universal postal service requires a diverse fleet. In Cheltenham, this includes 96 vans and 20 7.5 tonne trucks (transporting the mail between the local mail centre (Bristol Mail Centre, Gloucester Road North, BS34 7ST) and into the Delivery Office each day).</p> <p>We recognise that the Delivery Office is located on the parameter of the proposed zone (on Swindon Road, GL50 4BB) and have spoken to you before about the impact our vehicles have on Cheltenham. Currently around 50% of the vehicles are compliant under the proposed CAZ. We are striving for 100% of our vehicles to be compliant when the CAZ comes into force.</p> <p>We want to prioritise electrifying Cheltenham Delivery Office but have faced a number of challenges. These include the costs associated with upgrading the power supply to the site which are much higher than elsewhere, and the limited space on site available to us:</p> <p>Two independent contractors have reviewed the site and have come to the same conclusion that introducing EV charging at the delivery office would be extremely challenging. We have instructed a third to review again. This will include load balancing etc. to try and reduce the required electricity supply.</p> <p>This is a difficult site to electrify. At present the only option available is to swap older non compliant diesel and petrol vans out with compliant Euro 6 vans. However, we recognise the importance of reducing emissions in Cheltenham and want to work with you to do so. We would therefore welcome the opportunity to discuss this with you to understand if we can work collaboratively to resolve and overcome these challenges. We are equally interested to discuss any plans for funding grants for electric vehicle charging infrastructure. This office uses public parking so we particularly welcome discussion regarding plans for public charging infrastructure and how it might be made available to Royal Mail vehicles.</p> <p>We look forward to hearing from you to discuss how we can work together to electrify Royal Mail's Cheltenham Delivery Office.</p>	
<p>12</p>	<p>Vision 21 has mixed views on the AQAP. The aspirations are good, but the implementation period needs to be timetabled. Also, air quality levels are relatively poor throughout the town and the AQMA itself is only 0.03km² in area, which is too small, since virtually all of the town's population and greater than 99% of the town is actually outside of the AQMA. As such, we ask that the AQMA is extended as quickly as practical to include other parts of the town.</p> <p>Comments on the plan</p> <p>1. Continue to review and develop the Air Quality Strategy for the borough, expanding on The actions and measures outlined in the Air Quality Action Plan through consultation and</p>	<p>We will ensure that all actions have an appropriate time frame assigned. The declaration of an AQMA is a statutory process and made when levels of pollutants exceed or are likely to exceed set objective/limits. Where there data indicates any exceedance then the management area will be declared. We will continually review the data and act according but the additional wider actions will have benefits across the Town as a whole. Internal progress reports will be submitted every 6 months and an annual</p>


<p>engagement with partners. We feel it is particularly important that at a review is undertaken on an annual basis and the AQAP is revised to meet any new legislation or to take opportunities concerning new planning developments into consideration.</p> <p>2. Work with Gloucestershire County Council Highways to explore the viability of creating Ca-free Zones and/or Emissions Charging Zones. We want to see greater cooperation between the two authorities and we would like to see active progress towards the introduction of car free zones and possible emission charging zones.</p> <p>3. Aspire to reduce the levels of NO₂ below the national target objective of 40µg of NO₂/m³ and aim for continuous improvement in this measure. We would like to see active steps included within the AQAP to back up this aspiration and see it stated that new steps will be introduced should any new limitations be introduced during the lifetime of the plan</p> <p>4. Review the borough's Smoke Control Zones. We agree with this action without comment</p> <p>5. Undertake education and awareness campaigns: a. Engage with NHS Gloucestershire to raise awareness of the effects of exposure to poor air quality where limits are exceeded. b. Create a Public Health Awareness Campaign around high levels of air pollution in partnership with the county council.</p> <p>6. Engage with the university, Gloucestershire College, schools and their students to raise awareness of air quality issues and action possible to improve air quality</p> <p>7. Ensure that the planning and design of the Golden Valley Development sets a standard For high air quality in an urban development.</p> <p>8. Support Gloucestershire County Council's delivery of an expanded Arle Court transport hub to further contribute to higher air quality standards in Cheltenham. We agree with the above statements, but would like to see them timetabled as well as Linked along with appropriate resources to CheltenhamZero and Planet Cheltenham initiatives.</p> <p>9. Encouraging investment by all landowners and authorities in rapid charging points for electric vehicles. We agree with this action</p> <p>10. Adopting a policy for licensed taxis and private hire vehicles that immediately remove the most polluting vehicles and achieves a net zero emissions fleet by 2030. We agree with this action, but we would also like to see a policy on taxis standing at taxi ranks, to ensure their engines are not running to power heaters or air-conditioning introduced if there is not one already in place.</p> <p>11. Support Gloucestershire County Council as the local highways authority to deliver modal shift away from private cars, improvement in Cheltenham's walking and cycling routes by: a. Developing strategic routes and closure of certain town centre roads to certain vehicle</p>	<p>status review is submitted to Defra each year. Provisions in the new Environment Act reinforce joint working arrangements between upper and lower tiered Authorities. The levels of NO₂ can be viewed on line and are low except within the AQMA. It is acknowledge that some of the measures can and are being done in house using existing resources but additional resources will be need for others and we will be further evaluating each measure during the planning phase. We will include the comment on taxis during any revision of our Licensing Policy on Private Hire and Taxis.</p> <p>We will maintain a close working relationship with CheltZero as one of our key partners as we progress the action points. We will consolidate existing data regarding travel choices from the Active Travel team at GCC and CBC have an EV roll out programme and are currently consulting on various locations across the town to establish the most appropriate route for delivery. Cheltenham Council is currently undergoing a strategic review of parking looking at how to serve individuals as well as deliver the wider outputs, including the cycle hub consultation which ended on 26th February 2023. We are carrying out a strategic review of car parking and spaces reserved for car sharing will be considered. Regarding the schools project we have secured some resourcing to progress this initiative. We will begin with schools as we feel this targeted sector will have greatest impact. It could be rolled out to other sectors when resources allow. New PM levels now set by Government</p>
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<p>types.</p> <ul style="list-style-type: none">b. Promoting cycling and upgrading infrastructure.c. Adopting 'Twenty is Plenty' where possible.d. Apply variable parking charges to incentivise use of EVs and hybrids.e. Promote Workplace Travel Plansf. Promote a 'No Idling Policy' for buses and taxis <p>We agree with all above and encourage that CheltenhamZero and Planet Cheltenham initiatives are engaged with any public awareness raising campaigns</p> <p>12. Using available policy tools to support sectors containing more polluting vehicles to switch to cleaner vehicles:</p> <ul style="list-style-type: none">a. Develop partnership for last mile delivery in town centre, by sustainable transport.b. Build on existing progress to implement alternative fuel sources for business fleet within the council and its partner organisations. <p>13. Investigate setting targets for PM10 and PM2.5 in line with WHO guidance, and Emerging DEFRA requirements, due to be announced November 2022.</p> <p>14. Maintain review and when possible expand air quality monitoring locations around the borough.</p> <p>We agree with the above actions, but in 13, resources need to be set aside in preparation for the introduction of more stringent measures.</p> <p>Comments regarding Table 6</p> <ul style="list-style-type: none">1 Engage with Royal Mail to move toward low emissions fleet <p>No comment, but support the idea</p> <ul style="list-style-type: none">2 Improve data around AQMA (and beyond):<ul style="list-style-type: none">A) Commission a study to understand purpose of car trips (including start/end points)throughB) AQMA B) Single person or multiple occupancy surveyC) How car parking generates trips through the AQMA <p>Surely some of this must already have been done and the information available?</p> <ul style="list-style-type: none">3 Implement Junction improvements/traffic light changes in vicinity of AQMA Work should begin as quickly as practical4 Create a Public Health Awareness Campaign around high levels of air pollution <p>Should be done as quickly as possible with a front end loading doing much of the work in early years</p> <p>Invest resources into Planet Cheltenham initiative and invest more into CheltenhamZero initiative</p> <ul style="list-style-type: none">5 Engage with local NHS Trust to raise awareness of the effects of exposure to poor air quality where limits are exceeded <p>Discussions should be initiated as quickly as possible</p> <ul style="list-style-type: none">6 Ensure that the planning and design of the Golden Valley Development sets a standard	
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	<p>for high air quality in an urban development including consolidation opportunities to reduce deliveries through AQMA</p> <p>We support the action</p> <p>7 Develop partnership for last mile delivery in town centre, by sustainable transport</p> <p>We support the action</p> <p>8 Offer more EV charging points in the streets surrounding the AQMA</p> <p>We support the action but want it extended across the other parts of town</p> <p>9 Extend the existing priority parking areas for Electric Vehicles within parking areas of AQMA</p> <p>We support the action</p> <p>10 Install Rapid Charging Points for Electric Vehicles</p> <p>Expedite this action</p> <p>11 Increase Car Sharing in AQMA</p> <p>Approach a car sharing company and consider providing one or more dedicated parking places, promote its identification and reserve it for community shared vehicles only.</p> <p>12 Continue to review and development of Air Quality Strategy for the borough, expanding on the actions and measures outlined in the Air Quality Action Plan through consultation and engagement with partners</p> <p>Essential to continue and review</p> <p>13 Aspire to reduce the levels of NO2 below the national target objective of 40µg of NO2/m3 and aim for continuous improvement in this measure</p> <p>We support this action</p> <p>14 Investigate setting targets for PM10 and PM2.5 in line with WHO guidance, and emerging DEFRA requirements</p> <p>Need to up the game, the council needs to be ready to react to them as quickly as possible</p> <p>15 Deliver a Schools AQ Project</p> <p>Why stop at schools. Invest more in CheltenhamZero project to deliver info to businesses.</p>	
<p>13</p>	<p>I live within the AQAP and traffic is worse than ever across Swindon Road especially in 2022!. The plan has not looked at increased demand and has relied on data which is no longer relevant and focuses only on decarbonizing the transport with little or no reference to providing better cycling links along the A4019, (yes the road is wide enough to include a separate cycling lane down the whole AQAM area. As a resident of xxxx Street it makes reference to putting in electrical charging points however as a cyclist and non-car owner, I have little or no space to leave the bicycle inside the house, there are no safe cycling hangers within the area. Also every side street attached to the AQAM zone should be a 20mph speed limit. The amount of cars that speed, accelerate into the road is not only dangerous but it emits a lot more pollution. It would be good to see more trees along the route and new builds to consider having green walls. It is shame to have to live within this area where I cannot keep the windows open and the need for air purifiers are necessary. I believe the link between the brewery and car park should include either an overpass/underpass to ensure better pedestrian provision whilst allowing the traffic to flow</p>	<p>To support the Connecting Cheltenham report we recently consulted on provision of a new cycle hub for the town centre to promote travel by bicycle. This closed on 26th February. We continue to work with our climate change team on areas which overlap air quality and steps to net zero. See point 10 for road safety comments. With regard to trees within the AQMA there are a number of native species along the AQMA. Recent planting of hawthorn and field maple has been carried out in Poole way car park. We will encourage Royal Mail to add additional vegetation on their boundary with advice from CBC Tree Officer. We have made a commitment to develop an SPD on air quality which would clarify the role trees may play in removing pollutants. The role of PMs has been included in the wider action plan.</p>

	<p>better.</p> <p>It is also interesting that the Lidl supermarket went through planning very easily without any remarks on air pollution and it is clear this supermarket has increased the traffic within this area.</p> <p>I look forward to seeing substantial changes to this plan as electrifying transport is great for Nitrogen Dioxide yet it doesn't change the PM2.5 that includes brake dust etc.</p>	
14	Not bold enough.	Not enough information provided
15	<p>The draft plan is totally lacking in substance. It is very vague and there is little in the way of concrete ideas. Cheltenham has been monitoring pollution on and off for years, but no action has actually been taken to make the radical steps needed to make an effective change. This is a huge wasted opportunity and another 5 years will roll by with no action. I totally support the response made to this draft by the Clean Air Cheltenham group.</p>	<p>The draft plan developed by our experts and partners identified measures which bring about the most reduction in the pollutants which are causing most concern. We continue to meet our monitoring obligations which help inform data driven decision making.</p>
16	<p>With motor vehicles being a major emission source in Cheltenham for both NOx and PM, increasing rates of cycling would be one of the most rapid and effective ways of improving air quality within our urban area.</p> <p>It offers an accessible mode of travel that can replace many short journeys of one to three miles, and through reducing short-trip congestion, offers benefits to improving reliability of public transport and other modes for longer journeys. Well designed initiatives supporting walking and cycling have been shown through independent research to deliver the multi percentage point benefits in air quality that are needed.</p> <p>Having reviewed the action plan, the committee would like to record the following observations;</p> <p>The strategy prioritises electric vehicle initiatives for improving air quality. These cannot equitably solve the challenges the council is facing within reasonable timescales. Electric vehicles are generally heavier, can present greater road danger, and still emit significant particulate matter from tyre and brake wear. We believe the strategy should instead adopt a clear hierarchy of measures, beginning with walking and cycling, rather than assuming very little modal share can be achieved.</p> <p>Our assessment is that the LCWIP for Cheltenham (referenced p22), which the strategy relies on to deliver change, is incomplete and out of date. It omits several significant desire lines, particularly from the north west and south east of Cheltenham, and includes no meaningful cross-centre connectivity. There needs to be co-produced work now to progress Connecting Cheltenham to develop a truly ambitious plan for cycling in Cheltenham, and a plan for implementation.</p> <p>We note the particular challenge of the area of exceedance surrounding Poole Way and its connection to the Lower High Street. The proposals to improve traffic in this area also need to acknowledge that the east-west corridor represents a major bottleneck to cycle routes into the town centre. Increasing vehicle speed or capacity should not be allowed to further increase hostility to cycle users in this area. We hope there will be opportunities to work with the authority throughout the process of attempts to address traffic levels in this area.</p>	<p>Cycling comments are addressed in our Connecting Cheltenham Strategy report. The action plan was produced in response to the exceedance of NO₂ and so reduction of petrol and diesel vehicles is the main focus. We acknowledge that this does not eliminate sources of PM and recognise the additional health benefits that cycling brings. The LCWIP is owned by GCC Transport planning team. Comments will be forwarded to them for inclusion in any revision and we continue to work with GCC and our Climate Change Team on this area. See comments regarding consultation for a cycle hub in the town centre. We have secured some resourcing to work with schools which will include measures to reduce pollution at the school gates.</p>

<p>A small, initial intervention would simply be to provide appropriate cycle parking and access for the royal mail depot and collection point, which currently offers no active transport opportunity. There is also opportunity with the neighbouring mini-holland scheme being developed by Gloucestershire County Council to simplify motor vehicle flows by reducing the substantial traffic flows into Swindon Road and Townsend Street, reducing idling times and junction phasing.</p> <p>The report also references Cheltenham General Hospital. As previously highlighted in our consultation response to the Connecting Cheltenham, the hospital lacks convenient and direct cycle connections, particularly from Back Montpellier Terrace along Sandford Road. An education campaign targeting the local NHS acute Trust will not be successful without enabling measures to support modal shift on key transport corridors to the site.</p> <p>We believe the plan would be improved by specifically considering 'school-run' sources of congestion, which receives only brief reference around education campaigns. With the pausing of further rollout of Gloucestershire County Council's school streets programme, we see a significant gap in plans to address the air quality challenge that these short trips create.</p> <p>The council should include a clearer statement on how it believes school-run motor vehicle traffic can be reduced, and the practical support beyond education that it could offer to schools who want to enhance their active travel offer.</p> <p>The action plan places all responsibility for improving cycling infrastructure on Gloucestershire County Council. We suggest that Cheltenham Borough Council needs to recognise the very significant assets it has within its own control, and that it can take steps to improve routes away from the highway network, particularly through upgrading park routes, removing barriers that exclude the full range of accessible cycles, and substantially increasing secure cycle parking availability across retail centres.</p> <p>The council also needs to recognise the very significant role the Honeybourne Line will play in any future mobility plan, and that the current shared space arrangement is already struggling to support meaningful cycle speeds. We encourage Cheltenham Borough Council to focussed dialogue with Gloucestershire County Council on a clear maintenance and upgrade pathway, recognising the role of this key link within the highway network for non motorised vehicles.</p> <p>Overall, we believe that to improve air quality, a significant number of private motor vehicle trips need to be replaced by sustainable transport. The current plan will not deliver this. Indeed, there is a major risk that attempts to improve traffic flow and speed will paradoxically induce additional trips through increased motor vehicle convenience, leading to further deterioration in air quality and more adverse conditions for cycling.</p> <p>To truly reduce transport emissions, the evidence shows that bold steps are required to significantly reduce motor vehicle dominance. Whilst this will inevitably require greater collaboration with Gloucestershire County Council, we believe there are interventions where Cheltenham Borough Council can show meaningful leadership, and we hope there are opportunities to work with you to deliver these as the plan moves forwards.</p>	
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17	Cheltenham's air quality challenges are very localised. The biggest impact would be preventing traffic from queuing at the west side of High Street - looking at traffic light phasing particularly.	New traffic signals were installed on the A4019 and contribute to reducing congestion and thus emissions,
18	 <p>Clean Air Cheltenham response to 2022 Draft AQAP.pdf</p>	<p>We thank Clean Air Cheltenham for their detailed comments. This plan aims to compliment not repeat existing work streams, plan, policies and statutory functions. Additional action have been included for PM control such as reviewing smoke control areas and acknowledging the role of clean air zones. We will continue to work closely with Gloucestershire County Council and partners through our Gloucestershire Air Quality and Health Partnership. GCC are working to fill staff vacancy of Air Quality officer and we are exploring the option for a CBC air quality officer post to help fulfil our ambitions and to ensure communication between County and all Districts continues. We provide monitoring data to GCC for inclusion on their website. GCC sustainability team have created a power BI report webpage with all districts air quality data collated. It will be hosted on GCC Greener Gloucestershire's page. GCC are awaiting approval for website software. We are working with GCC sustainability team on their bidding process for supplementary monitoring for PMs. We support the bid for funding for Mini Holland in Cheltenham in St Marks and the Honeyborne line</p>
	<p>the omission of the impact of open fires, wood-burning stoves and garden bonfires. Why is air pollution from these sources and measures to control it not included anywhere in the draft plan? Why is there no part of the draft plan that deals with garden bonfires</p>	<p>More detail on SCA included. Bonfires are dealt with under our statutory nuisance provisions but we recognise the opportunity to provide information on the impact on air quality of such burning.</p>