

Draft Air Quality Action Plan

Consultation Report

Introduction

A draft Air Quality Action plan (2022-27) was produced for public consultation. Results from this will be fed into the production of the final plan which will be presented to November Environment, Transport and Sustainability Committee.

An Air Quality Action Plan (2022-2027) is required as part of our statutory duties under the Environment Act 1995, as stipulated by the Local Air Quality Management (LAQM) framework.

Headlines

- 64% of almost 300 respondents feel informed or very informed about air quality in the city.
- 35.1% of all respondents own or have access to a petrol-car less than 15 years old compared to only 8.6% older than 15 years¹.
- 21.9% of all respondents own or have access to a diesel car or van more than 5 years old, compared to 7.5% with access to a diesel car or van less than 5 years old

In order of importance, based on the consultation responses, the priorities are ranked as follows:

- **Priority 4: Reduce emissions from buildings and new development** based on the feedback received considered to be the most important of the 5 priorities at 86.7%². Within Priority 4:
 - Highest levels of support³ - 'increased information on clean home heating and subsidies available' 85.2%
 - Lowest levels of support³ - 'encouraging reducing the amount of solid fuel burning at home' at 62.8%
- **Priority 1: Increase active travel, support mode shift and reduce the need to travel:**
 - Highest levels of support³ are for 'better public transport links', at 86.5% if this was going to improve air quality
 - Lowest levels of support³ - 'installation of a cycle hangar near my home' at 50.9%
- **Priority 2: Encourage and support uptake of ultralow and zero emission vehicles:**

¹ Respondents could own more than one vehicle

² Very important or important

³ Strongly or somewhat support

- Highest levels of support³ - 'more ultra-low emission buses in operation' (92.4%)
- Lowest levels of support³ – 'discounted parking permits for lower emission vehicles' (57.2%).
- **Priority 3: Improve and public awareness:**
 - 64.5% of respondents already use news and weather reports to find out about air quality compared to only 8.6% using Sussex Air Alert System. There is scope for promoting various alert systems eg 91.4% of respondents say they would use Sussex Air Alert System and 87.4% would use online real time air quality information.
 - 12.7% of respondents have switched to cleaner energy already and 32.3% could do so in future with support.
 - 9.1% of respondents have already purchased or hire a low or zero exhaust vehicle and a further 45.4% could do so with support (types of support mentioned feature on p15).

Methodology

An online survey via the council's consultation portal, Citizen Space was open from 16 May to 10 July 2022. Further separate responses were also received in response to the consultation. The survey was publicised via the council's social media, through direct emails and through the council's Active & Inclusive Travel Forum. Posters were sent to organisations within the city to publicise the consultation, including sports venues and GP surgeries. A contact phone number and email address were available for people to request paper copies of the draft plan and the questionnaire.

Results

There were 279 responses to the survey. 8 submissions were from stakeholders, 2 of these left comments which are summarised on p17-18, along with summaries of stakeholder comments received by email.

Q How would you rate your awareness of air quality and pollution in the city⁴?

	Number	%
Very well informed	33	12.0
Fairly well informed	143	52.0
Neither informed or not informed	40	14.5
Not very informed	47	17.1
Not informed at all	12	4.4
Total	275	100

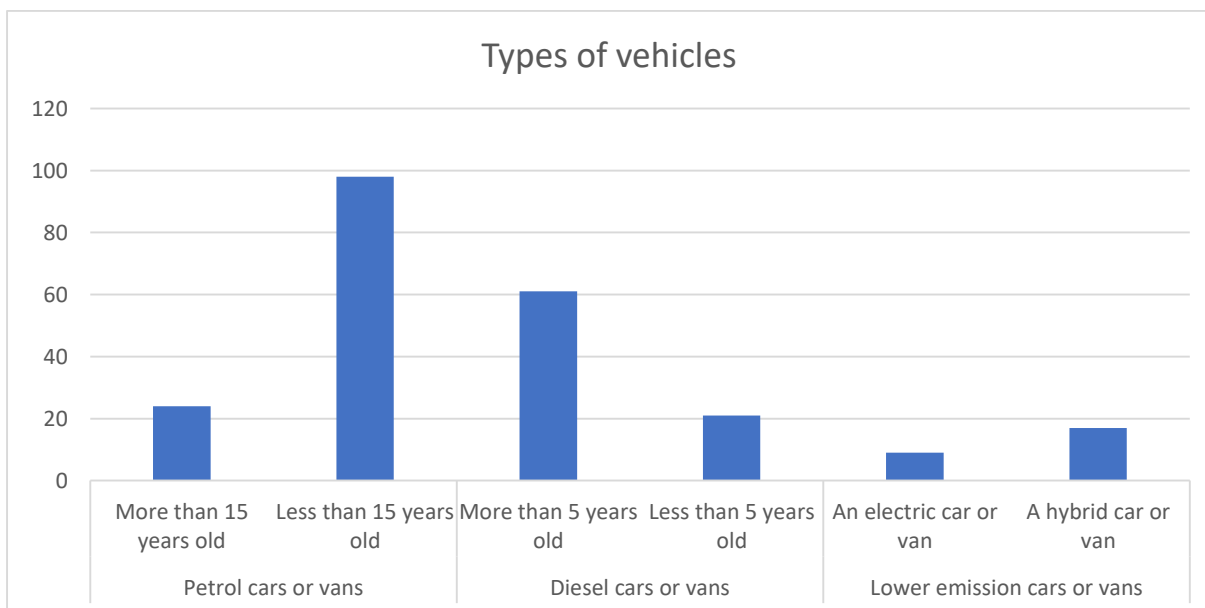
⁴ Excludes 'don't know'

Well over half of respondents (64%) feel either very or fairly well informed about air quality and pollution in the city.

Q Which of the following do you own or have access to? (respondents could choose more than one option)

	Number	% of all respondents ⁵
A petrol car or van more than 15 years old	24	8.6
A petrol car or van less than 15 years old	98	35.1
A diesel car or van more than 5 years old	61	21.9
A diesel car or van less than 5 years old	21	7.5
An electric car or van	9	3.2
A hybrid car or van	17	6.1
An electric motorcycle or moped	1	0.4
None of the above	70	25.1

8.6% of respondents own, or have access to, older⁶ petrol cars or vans but for older⁷ diesel vehicles this is higher at 21.9%.



⁵ % will not total 100 as respondents could choose more than one vehicle type

⁶ Older than 15 years

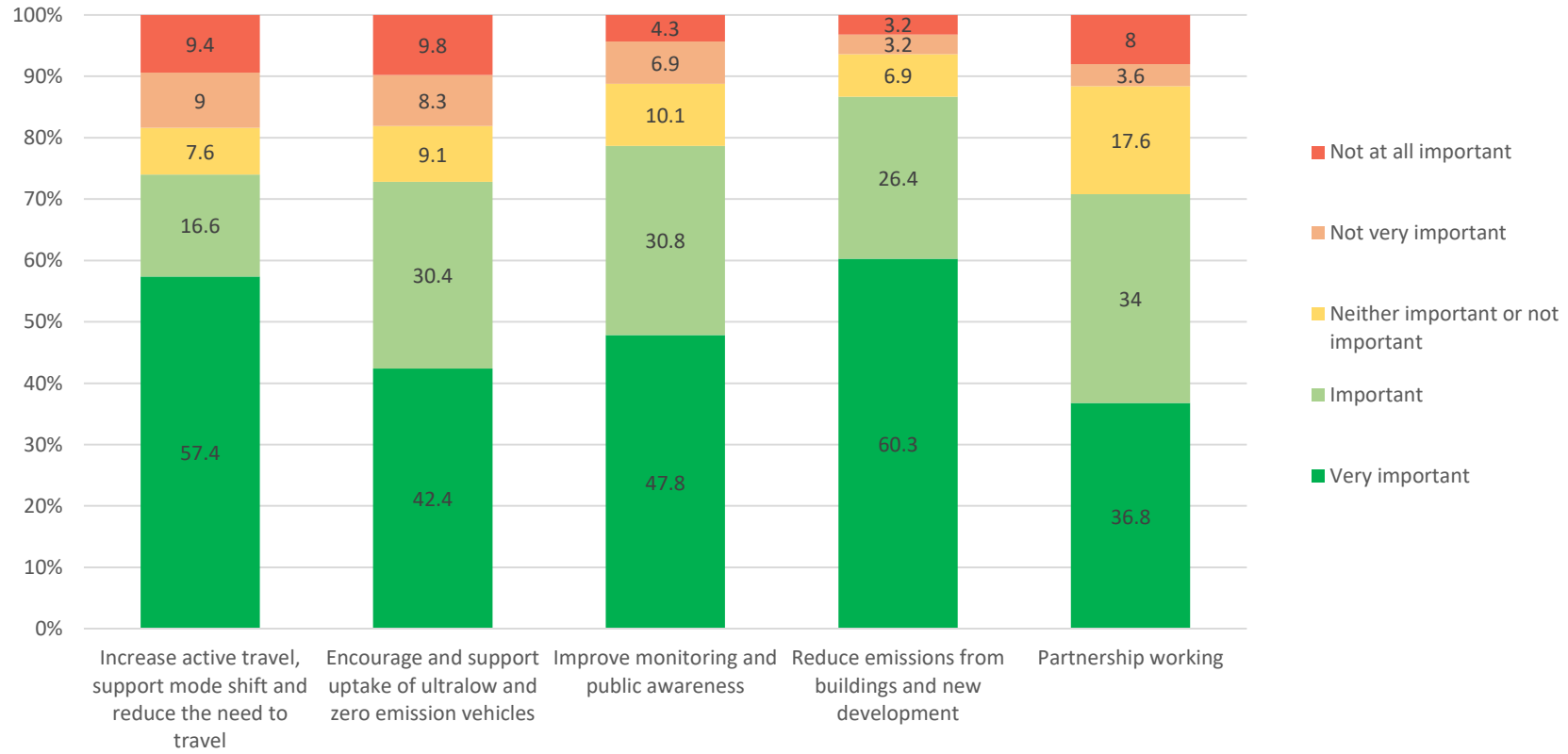
⁷ Older than 5 years

Q How important do you think our Air Quality Priorities are?

Reducing emissions from buildings and new development (Priority 4) is considered to be the most important² of the 5 priorities at 86.7% and Partnership working (Priority 5) the lowest at 70.8%

	Very important		Important		Neither important or not important		Not very important		Not at all important		Total
	No.	%	No.	%	No.	%	No.	%	No.	%	
Increase active travel, support mode shift and reduce the need to travel	159	57.4	46	16.6	22	7.6	24	9.0	26	9.4	277
Encourage and support uptake of ultralow and zero emission vehicles	117	42.4	84	30.4	25	9.1	23	8.3	27	9.8	276
Improve monitoring and public awareness	132	47.8	85	30.8	28	10.1	19	6.9	12	4.3	276
Reduce emissions from buildings and new development	167	60.3	73	26.4	19	6.9	9	3.2	9	3.2	277
Partnership working	92	36.8	85	34.0	44	17.6	9	3.6	20	8.0	250

How important are our air quality priorities?



Q How informed do you feel about how you could contribute to improving air quality where you live?

Over 55% of respondents feel either fairly or very well informed about air quality both in their local neighbourhood and in the city.

	Very well informed		Fairly well informed		Neither informed or not informed		Not very informed		Not informed at all		Total
	No.	%	No.	%	No.	%	No.	%	No.	%	
In your local neighbourhood	63	25.4	82	33.1	48	19.3	32	12.9	23	9.3	248
In the city	61	24.6	90	36.3	45	18.1	34	13.7	18	7.3	248

Priority 1: Increase active travel, support mode shift and reduce the need for travel

Q Which of the following would you use support if they were going to improve air quality?⁸

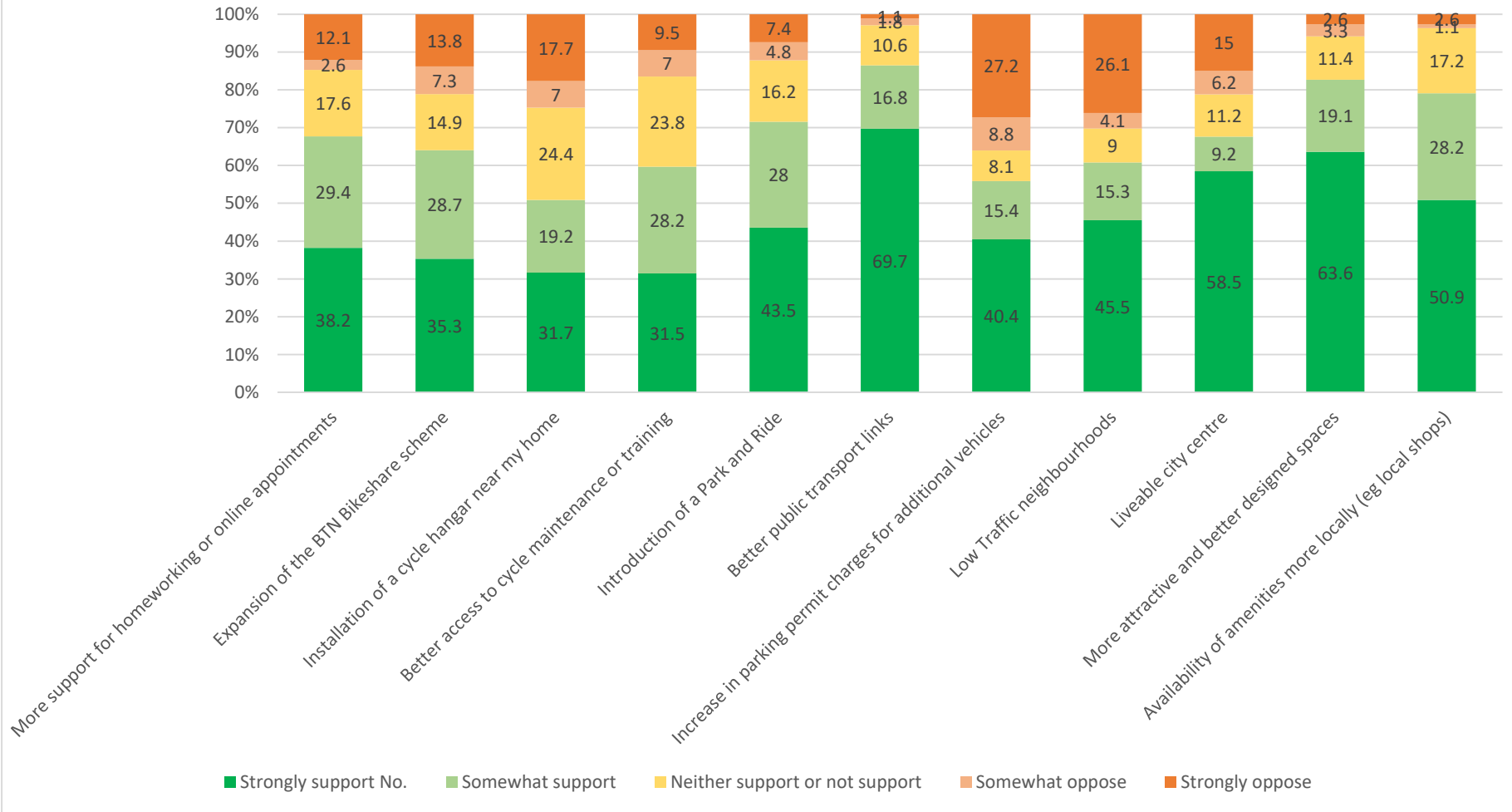
Within Priority 1 highest levels of support³ are for 'better public transport links', at 86.5% compared to lowest levels of support³ for the 'installation of a cycle hangar near my home' at 50.9%

	Strongly support		Somewhat support		Neither support or not support		Somewhat oppose		Strongly oppose		Total
	No.	%	No.	%	No.	%	No.	%	No.	%	
More support for homeworking or online appointments	104	38.2	80	29.4	48	17.6	7	2.6	33	12.1	272
Expansion of the BTN Bikeshare scheme	97	35.4	79	28.8	41	15.0	20	7.3	37	13.5	274
Installation of a cycle hangar near my home	86	31.7	52	19.2	66	24.4	19	7.0	48	17.7	271

⁸ Excludes 'not sure'

Better access to cycle maintenance or training	86	31.5	77	28.2	65	23.8	19	7.0	26	9.5	273
Introduction of a Park and Ride	118	43.5	76	28.0	44	16.2	13	4.8	20	7.4	271
Better public transport links	191	69.7	46	16.8	29	10.6	5	1.8	3	1.1	274
Increase in parking permit charges for additional vehicles	110	40.4	42	15.4	22	8.1	24	8.8	74	27.2	272
Low Traffic neighbourhoods	122	45.5	41	15.3	24	9.0	11	4.1	70	26.1	268
Liveable city centre	152	58.5	24	9.2	29	11.2	16	6.2	39	15.0	260
More attractive and better designed spaces	174	63.7	52	19.0	31	11.4	9	3.3	7	2.6	273
Availability of amenities more locally (eg local shops)	139	50.9	77	28.2	47	17.2	3	1.1	7	2.6	273

Which of the following Priority 1 actions would you support if they were going to improve air quality?



Priority 2: Encourage and support uptake of ultralow and zero emission vehicles

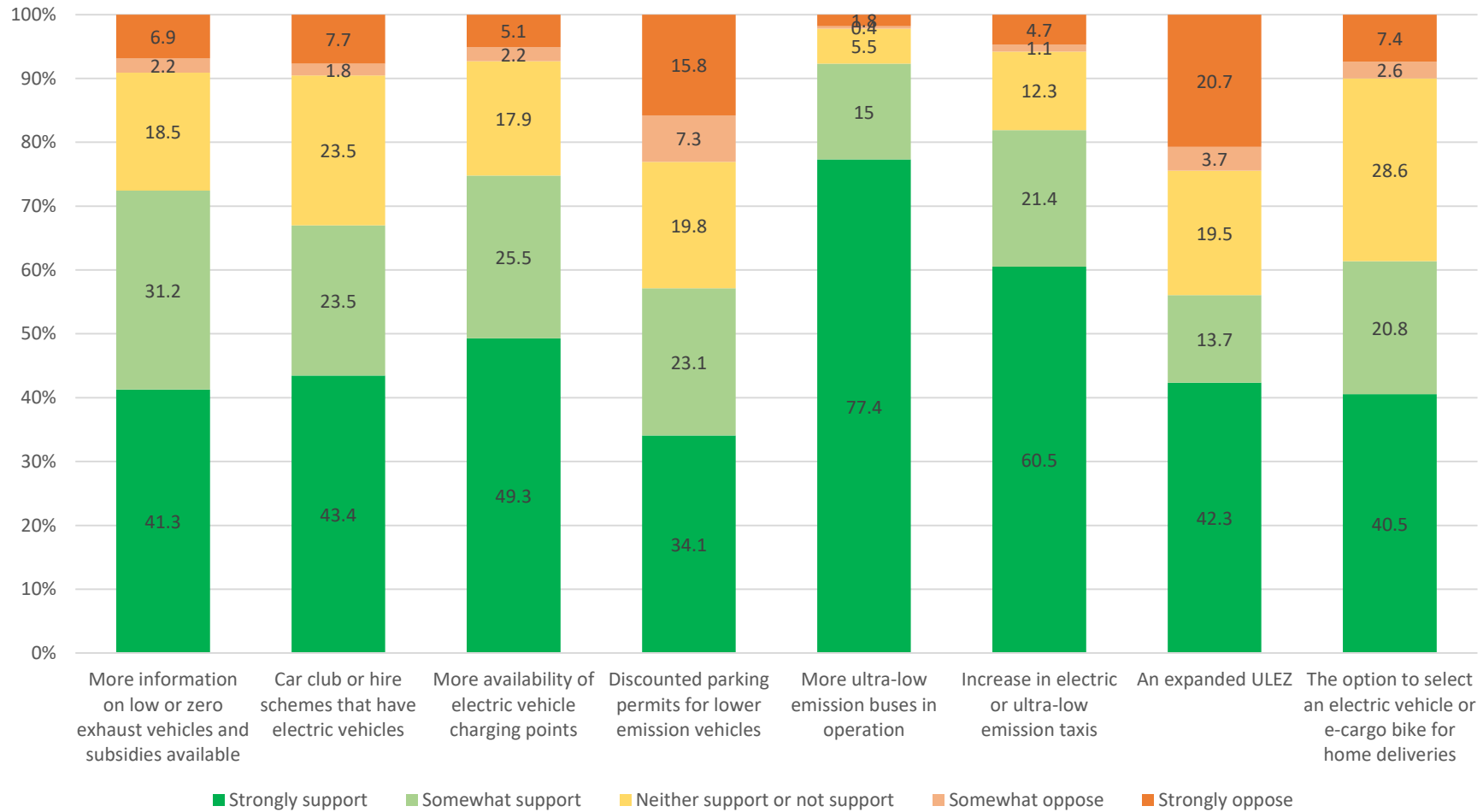
Q Which of the following would you use support if they were going to improve air quality?⁹

Within Priority 2, highest levels of support³ are for 'more ultra-low emission buses in operation' (92.4%) and lowest levels of support³ are for 'discounted parking permits for lower emission vehicles' (57.2%).

	Strongly support		Somewhat support		Neither support or not support		Somewhat oppose		Strongly oppose		Total
	No.	%	No.	%	No.	%	No.	%	No.	%	
More information on low or zero exhaust vehicles and subsidies available	114	41.3	86	31.2	51	18.5	6	2.2	19	6.9	276
Car club or hire schemes that have electric vehicles	118	43.4	64	23.5	64	23.5	5	1.8	21	7.7	272
More availability of electric vehicle charging points	135	49.3	70	25.5	49	17.9	6	2.2	14	5.1	274
Discounted parking permits for lower emission vehicles	93	34.1	63	23.1	54	19.8	20	7.3	43	15.8	273
More ultra-low emission buses in operation	212	77.4	41	15.0	15	5.5	1	0.4	5	1.8	274
Increase in electric or ultra-low emission taxis	167	60.5	59	21.4	34	12.3	3	1.1	13	4.7	276
An expanded ULEZ	102	42.3	33	13.7	47	19.5	9	3.7	50	20.7	241
The option to select an electric vehicle or e-cargo bike for home deliveries	109	40.5	56	20.8	77	28.6	7	2.6	20	7.4	269

⁹ Excludes 'not sure'

Which of the following Priority 2 actions would you support if they were going to improve air quality?

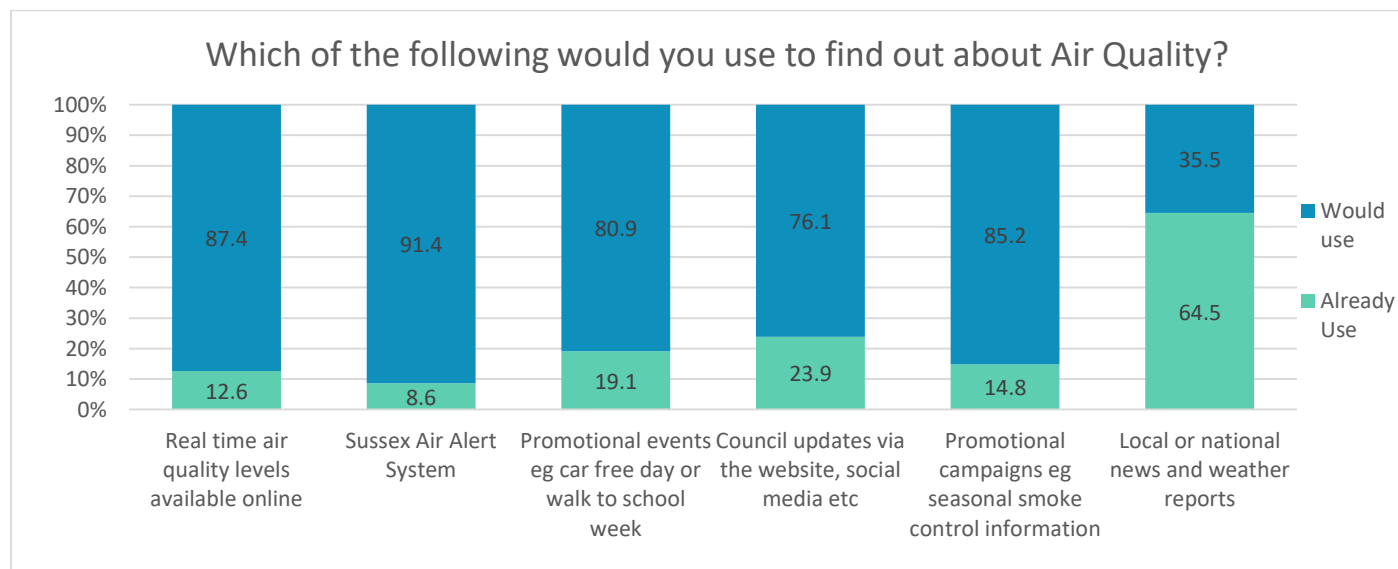


Priority 3: Improve Monitoring and Public Awareness

Q Which of the following would you use to find out about air quality?

Within Priority 3, 64.5% of respondents already use news and weather reports to find out about air quality compared to only 8.6% using Sussex Air Alert System. There is scope for promoting various alert system that people may not have knowledge of.

	Already Use		Would use		Total
	No.	%	No.	%	
Real time air quality levels available online	27	12.6	187	87.4	214
Sussex Air Alert System	16	8.6	170	91.4	186
Promotional events eg car free day or walk to school week	30	19.1	127	80.9	157
Council updates via the website, social media etc	43	23.9	137	76.1	180
Promotional campaigns eg seasonal smoke control information	25	14.8	144	85.2	169
Local or national news and weather reports	136	64.5	75	35.5	211



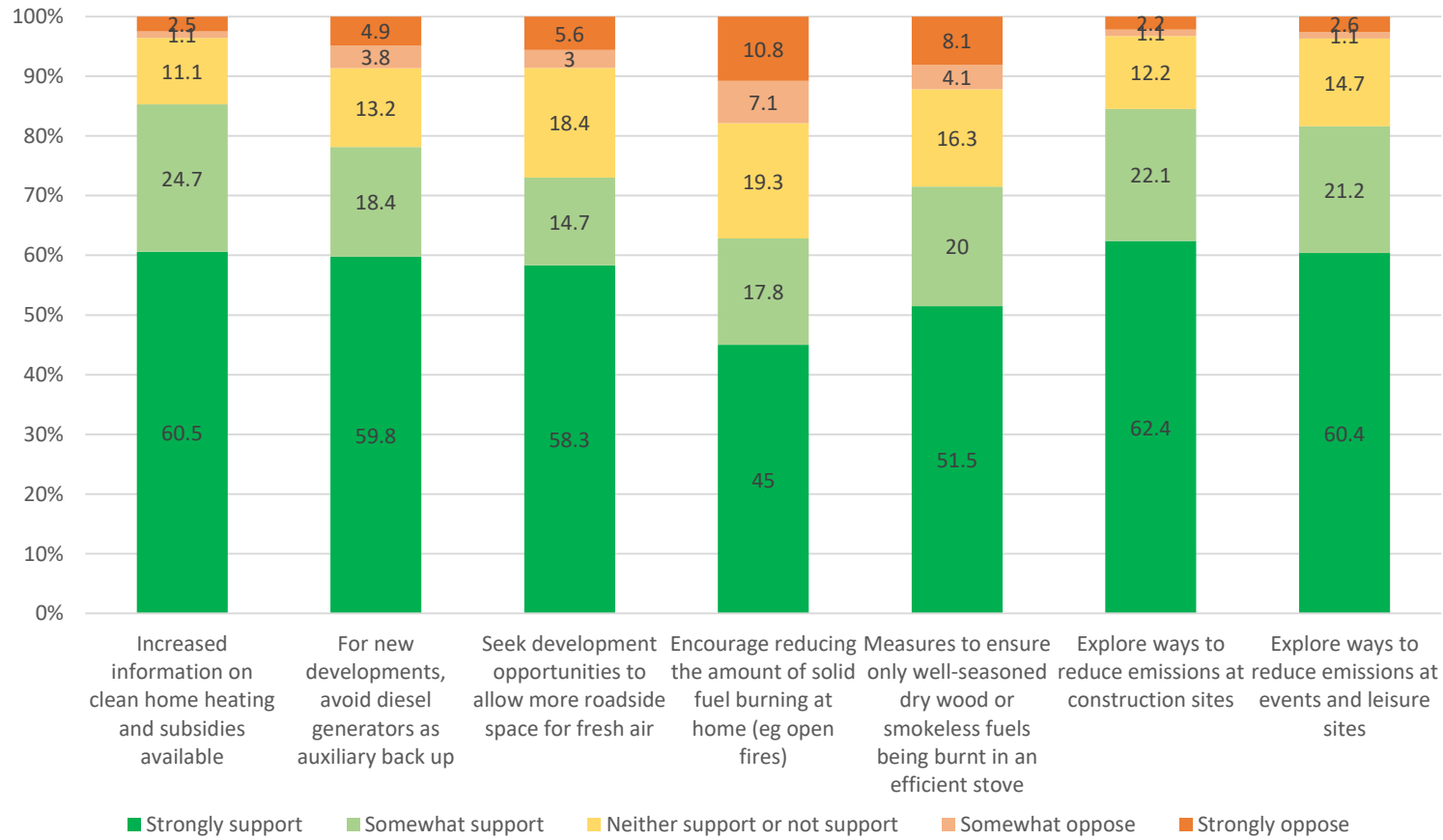
Priority 4: Reduce emissions from buildings and new development

Q Which of the following would you use support if they were going to improve air quality?

This is considered to be the most important of the 5 priorities at 86.7%² (p4). Highest levels of support³ are for 'increased information on clean home heating and subsidies available' 85.2%³ and lowest levels of support³ are for 'encouraging reducing the amount of solid fuel burning at home' at 62.8%

	Strongly support		Somewhat support		Neither support or not support		Somewhat oppose		Strongly oppose		Total
	No.	%	No.	%	No.	%	No.	%	No.	%	
Increased information on clean home heating and subsidies available	164	60.5	67	24.7	30	11.1	3	1.1	7	2.5	271
For new developments, avoid diesel generators as auxiliary back up	159	59.8	49	18.4	35	13.2	10	3.8	13	4.9	266
Seek development opportunities to allow more roadside space for fresh air	155	58.3	39	14.7	49	18.4	8	3.0	15	5.6	266
Encourage reducing the amount of solid fuel burning at home (eg open fires)	121	45.0	48	17.8	52	19.3	19	7.1	29	10.8	269
Measures to ensure only well-seasoned dry wood or smokeless fuels being burnt in an efficient stove	139	51.5	54	20.0	44	16.3	11	4.1	22	8.1	270
Explore ways to reduce emissions at construction sites	169	62.4	60	22.1	33	12.2	3	1.1	6	2.2	271
Explore ways to reduce emissions at events and leisure sites	165	60.4	58	21.2	40	14.7	3	1.1	7	2.6	273

Which of the following Priority 4 actions would you support if it were to improve air quality?



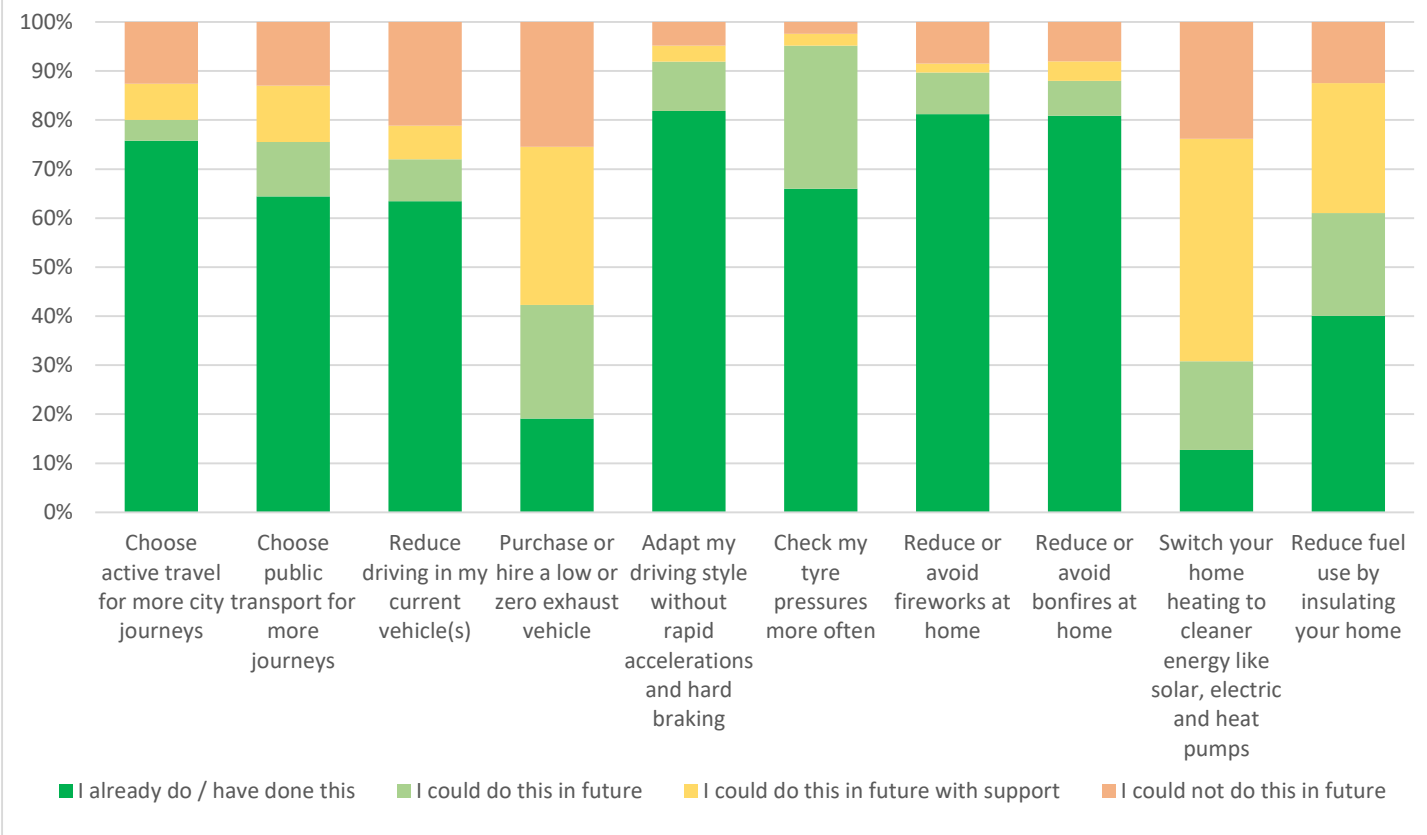
Q Which of the following could you easily contribute to?¹⁰

	I already do / have done this		I could do this in future		I could do this in future with support		I could not do this in future		Total
	No.	%	No.	%	No.	%	No.	%	
Choose active travel for more city journeys	197	75.2	11	4.2	19	7.3	35	12.5	262
Choose public transport for more journeys	168	64.4	29	11.1	30	11.5	34	13.0	261
Reduce driving in my current vehicle(s)	141	63.5	19	8.6	15	6.8	47	21.2	222
Purchase or hire a low or zero exhaust vehicle	42	19.1	51	23.2	71	32.3	56	25.5	220
Adapt my driving style without rapid accelerations and hard braking	171	81.8	21	10.0	7	3.3	10	4.8	209
Check my tyre pressures more often	140	66.0	62	29.2	5	2.4	5	2.4	212
Reduce or avoid fireworks at home	182	81.3	19	8.5	4	1.8	19	8.5	224
Reduce or avoid bonfires at home	181	80.8	16	7.1	9	4.0	18	8.0	224
Switch your home heating to cleaner energy like solar, electric and heat pumps	33	12.7	47	18.1	118	45.4	62	23.8	260
Reduce fuel use by insulating your home	103	40.1	54	21.0	68	26.5	32	12.5	257

- 12.7% of respondents have switched to cleaner energy already and 32.3% could do so in future with support.
- 9.1% of respondents have already purchased or hire a low or zero exhaust vehicle and a further 45.4% could do so with support (types of support mentioned feature on p15).

¹⁰ Excludes 'not applicable'

Which of the following could you easily contribute to?



If respondents said, 'I could do this with support' they were asked to give more details. There were 218 comments made which have been themed as follows:

Comment (top ten)	No. of times mentioned
Cleaner energy / heat pumps - too expensive / grants / subsidies	61
EVs - too expensive / needs subsidy	37
Insulation - too expensive / grants / community buying / subsidies	37
Need more info/ advice on cleaner energy	16
Buses - want better/ cheaper / more frequent bus service/ to outlying areas/ not all via city centre/ night buses/ Park and Ride	15
Renting home / council / housing association - can't change it/ landlord responsible	14
EVs - infrastructure/ technology needs to be improved	10
General Financial support needed	5
Conservation Area - double glazed front windows are difficult / need more information on restrictions/ too expensive	4
Walking - better infrastructure / pavements/ crossings/ for disabled	3
Difficult to retro-fit heat pumps / older houses	3

Any other comments

Comment (top ten)	No. of times mentioned
Reduce bottlenecks / Improve road layouts / Preston Circus / Bear Road-Lewes Road / Rottingdean / arterial routes / essential traffic only / reverse last 5 years TROs / remove cycle lanes	19
Ban / discourage / regulate: wood burning stoves / open fires / bonfires / at allotments / BBQs / fire pits / introduce wider smoke control	15
Cycling - more / better / safer / joined up infrastructure / routes / school routes/ on seafront / east-west / north-south / Old Shoreham Road	13
Reduce numbers of cars / in residential areas / multiple car ownership / diesel vehicles / car usage / short journeys / in city centre / including EVs / for Car Free Day	12
Park & Ride / for non-residents / commuters / shift tourists to public transport	12
Increase parking charges/ in city centre / for larger cars / more controlled parking / remove / reduce parking in BN1	8
Free/ Subsidised/ cheaper bus fares	6
Need smart traffic lights	5
Idling engines / are a problem / educate / more signs / fines	5
Plan not comprehensive enough / not future proofed / want glossary / multi choice questions wrong / priorities wrong / no costs given	5

About you

Q How have you heard about this consultation?

Method	No.	%
I read about it on the council website	40	14.3
I read about it on social media	150	53.8
I heard about it by word of mouth	24	8.6
I read about it in the local press	19	6.8
I saw a poster	2	0.7
Other (see below)	41	14.7

Other	Number
School	11
Local Community Magazines - Goldstone Valley Residents Association News Sheet (x1), The Post Magazine (x1), The Hovarian (x1), Preston Pages (x1), West Hove Forum Newsletter (x1), Latest Brighton Business News (x1)	6
Email (includes Local Access Forum (x1) Community group/ Association (x2) from Council Officer (x1)	5
Hollingdean News	3
North Laine Runner / Community Association / Community website	4
Labour Party	3
Local Councillor / Rottingdean Parish Council	3
Community Works	2
Better Points app	1
BHEP	1
Council's Consultation site	1
Council meeting	1
The Wave	1
Twitter	1
Sussex CCGs	1

Q How are you responding to this consultation?

Method	No.	%
As an individual	270	97.8
As a representative of a business, organisation or group <ul style="list-style-type: none"> Member of Rottingdean Parish Council (x2) Member of The Green Centre Chair of Friends of Wish Park, committee member of West Hove Forum and committee member of Friends of Hove Lagoon 	8	2.2

<ul style="list-style-type: none"> • Cycling UK's Cycle Advocacy Network, Local Representative, Brighton and Hove • Small business owner • Locksmith • Surveying business owner 		
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Comments from stakeholders - received as part of the online consultation:

Chair of Friends of Wish Park, committee member of West Hove Forum and committee member of Friends of Hove Lagoon

- Move towards the majority of BHCC buses to be electric to reduce pollution to outlying areas
- Negotiate with car manufacturers to do more research and development for other future vehicle zero carbon emission fuels

Cycling UK's Cycle Advocacy Network, Local Representative, Brighton and Hove

- Prioritise seeking funding to achieve early implementation of the Local Cycling and Walking Infrastructure Plan.
- Free/subsidised public transport for children and young people.
- Introduce congestion charging
- Ensure that Workplace Travel Plans have targets for non-car use and are enforced with sanctions for non-achievement.
- Ensure that the design of new developments is improved to prevent emissions from built-in car dependence, or that the application is refused.
- Public transport, walking and cycling routes to be available before occupation of new residential developments.
- Greater limitations on where large polluting SUV's can be driven and parked, for air quality (and safety) reasons.
- Assess Park and Ride on the basis of resulting motor traffic generation, increased vehicle emissions around car parking areas, increased motorised journeys on access roads, loss of valuable land for more sustainable purposes, potential to undermine more sustainable 'whole journey' door-to-door transport, cost of subsidies allocated to support motorised transport and car parks, increased total number of parking places (unless city centre parking is reduced by the equivalent number of spaces at the proposed Park and Ride car park).
- How will "Mitigation" of "residential and other parking" be achieved by adding electric vehicle charging points unless petrol/diesel vehicles are reliably excluded?

Comments from stakeholders - received by email:

American Express Services Europe Limited¹¹

American Express fully supports the City Council's commitment to reduce emissions and improving air quality in the City. Brighton and Hove City Council has already made strides to make it easier and safer for people to travel actively and sustainably, and we believe that the Draft Air Quality Action Plan sets out a credible path to truly make Brighton and Hove clean air city. We welcome that the draft AQA plan and the Local Transport Plan (LTP5) are being developed in tandem. There are several key dependencies, not least the viability and success of the AQA plan depends on the LTP5 being able to deliver commuters real alternatives to car use.

We welcome that any move to extend the Ultra-Low Emission Zone requirements to vehicles beyond buses will be accompanied by a future consultation. In advance of that consultation there are several considerations¹²

- Making public transport safe and reliable for shift workers and night workers (American Express operates 24 hours a day)
- Recognition that car use for shift and night workers is often the only safe and practical option.
- Accessibility issues, particularly for disabled colleagues, where public transport options may be impractical
- Flexibility to carers with individual needs.
- Park-and-ride needs to accompany any extension to the ULEZ as a viable alternative for people who need to commute into the centre of the city.
- Provision of infrastructure to support/incentivise the uptake of low or no emission vehicles, especially for charging / re-fuelling.

Lewes District and Eastbourne councils:

I would briefly like to state the following in support of the BHCC Draft AQAP:

- The document is clear and concise and conveys information for the lay reader, BHCC residents and those most at risk from air pollution.
- Welcomes Priority 5: partnership working.
- Welcomes Priority 4: reducing emissions from new development as this is also a priority for LDC
- The document puts into context carbon management versus air quality management and highlights key distinctions between the two, especially that CO₂ is not considered an air pollutant.
- BHCC's stringent NO₂ and PM targets, closer to WHO guidelines than UK standards and objectives, if approved by Defra will provide a high level of strategic support for neighbouring LAs such as LDC to implement the same or similar within their own AQAPs.
- The action plan table moves away from the obvious oft-stated transport related measures and draws on fresh and challenging ideas such as a feasibility study

¹¹ C 3,000 employees in Brighton and Hove

¹² Summarised below

for a city-wide smoke control area and improving emissions standards for Non Road Mobile Machinery on construction sites.

Gender	No.	%	City 130%
Female	108	45.4	50.2
Male	125	52.5	49.8
Non-binary	4	1.7	-
Other	1	0.4	-
Total	238	100	100

Age	No.	%	City %
17-24	2	0.8	17.2
25-34	19	7.2	15.0
35-44	49	18.5	16.4
45-54	61	23.0	16.0
55-64	80	30.2	13.1
65-74	42	15.8	9.3
75+	12	4.5	6.4
Total	265	100	100

Ethnicity	No.	%	City %	
Arab	Arab	0	0	0.8
Asian/ Asian British	Bangladeshi	1	0.4	0.5
	Chinese	0	0	1.1
	Indian	0	0	1.1
	Pakistani	0	0	0.2
	Any other Asian background	4	1.7	1.2
Black/ Black British	African	0	0	1.1
	Caribbean	0	0	0.3
	Any other black background	1	0.4	0.2
Mixed	Asian and white	4	1.7	1.2
	Black African and white	0	0	0.7
	Black Caribbean and white	0	0	0.8
	Any other mixed background	2	1.3	1.0
White/ White British	English / Welsh / Scottish / Northern Irish	187	78.2	80.5
	Irish	12	5.0	1.4
	Gypsy or Irish Traveller	0	0	0.1
	Any other white background	25	10.5	7.1
Other	Any other ethnic group	2	0.8	0.8
Total		239	100	100

¹³ ONS Census 2011, Brighton & Hove

Disability	No.	%	City %
Yes, a little	40	16.2	7.5
Yes, a lot	18	7.3	8.8
No	189	76.5	83.7
Total	247	100	100

Disability	No.
Physical impairment	35
Sensory impairment	7
Learning disability/ difficulty	7
Long standing illness	22
Mental health condition	14
Developmental condition	5
Autistic spectrum	0
Other	23

