Improving Air Quality in Brighton and Hove
Mapping current policies and actions against NICE Air Pollution Guidance
DRAFT

1. Purpose of document

This document summarises the findings of a mapping exercise conducted on behalf of the Brighton and Hove City Council Air Quality Programme Board, in order to identify policies and actions conducted or supported by the council which impact on air quality, and map them against the NICE (National Institute for Health and Care Excellence) Guidelines on Air pollution: Outdoor Air Quality and Health (NG70)[1]. The mapping exercise is being used as a live tool by the Air Quality Programme Board as a way of assessing progress in a comprehensive way against an agreed set of guidelines.

2. Introduction

NICE is a national body that provides guidance and advice to improve health and social care. They use the best available evidence to develop recommendations that guide decisions in health, public health and social care. NG70 was published in June 2017 and covers road-traffic-related air pollution and its links to ill health; it aims to improve air quality and so prevent a range of health conditions and deaths.

This review was conducted by a Public Health Registrar, working to the Air Quality Programme Board. They consulted with Planning, Environment, Transport and Traffic system departments, to get information about current activities and relevant policies and documents. Gaps in policies and actions have been identified and highlighted, and were presented and discussed at the Air Quality Programme Board in January 2018.

The review reflects the scope of the NICE Guidelines, and thus does not include the full scope of work conducted or supported by Brighton and Hove City Council (BHCC) or partners to improve air quality. Additionally, although the NICE guidelines are aimed at an audience wider than local authority[2], this paper focuses on activities conducted by, or related to, the local authority.

[1] https://www.nice.org.uk/guidance/ng70

[2] The NICE guidelines are written for use by: Local authority staff working in: planning, local air quality management and public health, including environmental health; Staff working in transport and highways authorities; Local government elected members; Employers; Healthcare professionals, people working in the voluntary sector, non-governmental organisations and education; Members of the public.

The sections in this document reflect, but do not directly match, those in the NICE Guidelines; this change was made to increase clarity, to remove duplicated recommendations, or more clearly address key themes such as zero and low emission travel. The sections outlined below and are as follows:

- Air pollution and plan making
- Development management and air quality
- Support zero and low emission travel (not a section in NG70, but created here to increase clarity)
- Clean Air Zones and Low Emission Zones
- Smooth driving and speed reduction
- Reduce emissions from public sector transport services and vehicle fleets
- Active travel (walking and cycling)
- Awareness raising

Please note that the scope and impact of each NICE recommendation are not equal; some address large overarching themes whereas others are more detailed, and the extent to which they have been met and the stage of implementation varies with each recommendation.

3. Achievements to date

BHCC is delivering action against most of the recommendations. City Plan Part 1 (including the Sustainable Transport Policy: CP9) and the Local Transport Plan (LTP4) address the majority of the planning issues related to air quality, and provide a strategic policy framework within which the design and citing of new developments and support for sustainable transport are addressed. The planning authority's development management service in Brighton & Hove also closely reflects the NICE recommendations: CP9 ensures that Transport Assessment and Travel plans are submitted with new development applications; Local Parking Plans outline Electric Vehicle (EV) parking space requirements for new developments; and the proposed introduction of the Community Infrastructure Levy (CIL) will further support renewable and low carbon reduction, air quality management and active travel measures.

Zero and low emission travel is encouraged through a variety of mechanisms including City Plan Part 1 (also to be addressed in Part 2) and through the active travel measures in the Local Cycling and Walking Infrastructure Plan (LCWIP) which will be developed in 2018-19. Proposals to develop a business case and seek funding to expand EV charging infrastructure are underway, with 40 public charge points already in place. Additional successes include Brighton and Hove's Bike Share scheme (BTN Bike share) and City Car Club.

Although Brighton & Hove does not have a Clean Air Zone, a bus-based Low Emission Zone was introduced in January 2015, which covers 98% of bus movements in the city. With the exception of a small number of low frequency routes, all buses entering the Low Emission Zone must be compliant with Euro-V standards by 2020. A report on current progress towards meeting this target will be presented to ETS Committee in June in 2018.

Steps have also been taken to address emissions from council fleet vehicles, including the introduction of a fleet tracking system and low-emission procurement criteria. Smooth driving is encouraged through the 20pmh speed limit in place across much of Brighton and Hove, and the Integrated Transport System for highways includes junction upgrades with a traffic control system to increase efficiency and reduces delays.

Active travel is specifically encouraged in City Plan Part 1 (and will be further addressed in Part 2) and the planned LCWIP will identify infrastructure needs to facilitate active travel; in addition, the projects funded by the Access Fund provide support to individuals seeking work, schools and businesses to promote and support active travel.

4. Summary of gaps in action against NICE guidelines

The following gaps were identified during the mapping process:

- There is no cross-sector, city-wide programme to promote walking and cycling, although an LCWIP is being developed which will assess the provision of cycling and walking infrastructure, including an integrated cycle network. Although there is work delivered to encourage active travel under the Access Fund, this is implemented on a rotating basis in the parts of the city identified to have greater need, and thus is not city wide.
- There is no comprehensive approach to awareness-raising around air quality. For example, there is no coordination with health professionals to ensure that they provide information or warnings on air quality to vulnerable groups or individuals; there are no public awareness initiatives planned to raise awareness or inform about air pollution; and although there is a website which provides information on air quality (Air Alert) uptake is relatively low (160 subscribers in Brighton & Hove) with limited information about whether subscribers are from vulnerable or at risk groups.
- The Freight Strategy referred to in City Plan (CP9) is not yet in place, although Local Transport Plan 4 (LTP4) which runs to 2018/19 outlines an aim to work with companies to 'develop a routing, delivery and servicing strategy for goods and freight vehicles', including encouraging cleaner last-mile deliveries.
- Although use of a fleet tracking system (CMS Supatrack) has been agreed for all new Council vehicles, some departments have yet to start using it. Fuel efficiency of individual fleet drivers is not analysed, and drivers are not provided with specific training on fuel efficiency.

- Parking Standards in Local Parking Plans - Parking Standards (SPD14[3]) don't include a requirement for 100% EV-ready infrastructure.
- There are currently no anti-idling zones within the AQMA (Air Quality Management Area), although schools have no-stop zones indicated by yellow lines; and around 100 anti-idling / engine cutting signs have been put up, including at junction approaches where there is high frequency and duration of queuing traffic; these could also be considered within the AQMA loading bays. Other anti-idling initiatives could also be considered.
- An Active Travel and Health Partnership, supported by Access Fund, works with local businesses to create active travel plans for staff; however there is no support for businesses to advise on how to reduce road-traffic related air pollution and improve fuel efficiency.
- The following NICE recommendations are considered challenging to implement in full due to practical / physical constraints (such as the lack of available sites in the city): the siting of buildings for vulnerable groups (schools, nursing homes, hospitals) away from polluted areas or roadsides; and the consideration of the impact of building configurations and vegetation on air quality (positive and negative).

5. Recommendations

The following recommendations highlight areas where a more comprehensive approach could be considered. Prioritisation should take into account where action would have greatest impact:

- Consider ways to develop a cross-sector city-wide approach to encourage walking and cycling, to address the provision of infrastructure, information, and attitude / behaviour change enablers. For example through an active travel strategy delivered alongside or as part of the LCWIP.
- Explore the most effective communication strategy to inform at risk / vulnerable groups about the impact of air quality and provide recommendations for action.
- Address gaps around fleet and freight, for example, by developing a freight and fleet strategy to address cleaner last-mile deliveries, reduce emissions from delivery vehicles, encourage more departments to introduce fleet tracking and fuel efficiency analysis systems, and conduct driver training on fuel-efficiency. This could be considered as part of Local Transport Plan 5 (LTP5) development.
- Consider an update to Parking Standards to include a requirement for 100% EV-ready infrastructure.

[3] Local Parking Plans: Parking Standards – Supplementary Planning Document 14

6. Summary of policies & actions mapped against NICE recommendations

4.1 Air pollution and planning

Include air pollution in plan making; relevant plans and policies include zero/low-emission travel

City Plan Part 1 was adopted in 2016 to provide the overall strategic spatial vision and planning policy framework for future development in Brighton & Hove through to 2030. The following strategic objectives relate to air quality:

- SO11: Provide an integrated, safe and sustainable transport system to improve air quality, reduce congestion, reduce noise and promote active travel
- SO22: Ensure pollution is minimised and actively seek improvements in water, land and air quality and reduce noise pollution

City Plan Part 2, which will contain the remaining development sites and detailed planning policies, and address related air quality issues, is being prepared with intended adoption in 2020.

Local Transport Plan (LTP4) was approved in 2015 and runs to 2018/19. It includes strategic goals and transport-focused objectives including Carbon Reduction and commits to reducing transport emissions that affect climate change and the local environment. The following objectives relate to air quality:

- Reduce the need to travel for some journeys and activities
- Provide information and choices for people to enable them to travel more sustainably
- Promote and enable greater use of zero- and low-emission forms of transport
- Use new technology to maximise reduction of carbon emissions

The LTP capital programme is approved annually, and is the primary source of funding for the LTP's 4-year Delivery Plan (Part B); it includes EV charge points and measures/infrastructure to encourage and enable more walking, cycling and public transport use.

City Policy on Sustainable Transport (CP9) within City Plan Part 1: provides the policy basis for integrated, safe, and efficient movement around the city through land use planning, to reduce emissions and improve air quality. It outlines the following plans for action, to be delivered through the **Local Transport Plan (LTP)**:

- **Buses:** introduce bus lanes on key routes; ensure infrastructure allows for future bus routes.
- **Cars:** improve traffic flow using traffic management measures including Intelligent Transport Systems, support car clubs; introduce 20mph zones in residential areas; promote use of alternative fuels and electric vehicles (e.g. through charge points).
- **Freight:** Prepare and implement a Freight Strategy for the city that will create an efficient system and network for delivery vehicles.

- **Walking and Cycling:** Implement an integrated cycle network by 2030; Promote cycling and walking as 'active travel' by providing advice to residents, workers and visitors to the city
- **Travel plans:** encourage more journeys by sustainable transport by supporting development of school, workplace and personalised travel plans
- **Parking:** Do not increase car park capacity in central areas; new developments to minimise off-street parking and provide cycle parking; encourage car-free housing and incorporate new technologies such as EV charging points; promote and facilitate better use of existing large car parks on the city periphery city and transfer journeys onto existing bus and rail services.

Further updates on the Intelligent Transport System, the Freight Strategy and the Integrated Cycle Network are outlined in the document below.

City Policy 18 (Healthy City) within City Plan Part 1 states that development proposals are expected to protect and improve local air quality and should be appropriately designed to mitigate negative impacts on air quality.

CP18 also states that Health Impact Assessments (HIAs) must be carried out (or incorporated into a sustainability appraisal) on all planning policy documents and HIAs are required for all strategic developments in the city. HIAs require that applicants for new developments demonstrate that they have made provision to minimise impact of air quality on residents, including at risk groups, and minimise the contribution of the development to air pollution. This mechanism encourages developers to consider how they will respond to the recommendations in the Development Management section.

The Health and Wellbeing Strategy reflects this and makes a commitment to ensure new developments are inclusive, adaptable and accessible and to improve the public realm to encourage walking and cycling. Brighton and Hove City Council was one of the first local authorities to include an air quality chapter in their Joint Strategic Needs Assessment (JSNA)[4], which outlines air quality issues in Brighton and Hove and their connection to health outcomes.

When plan making, consider:

Siting and designing new developments to reduce the need for motorised travel

City Plan policy on Sustainable Transport (CP9) and the **Development and Special Area policies in City Plan Part 1** commit to directing significant developments to accessible locations / places with good sustainable transport links or locations that can be made more sustainable through investment in walking, cycling and public transport improvement.

[4] http://www.bhconnected.org.uk/sites/bhconnected/files/6.4.9%20Air%20Quality%20JSNA%202016.pdf

Siting buildings such as schools, nurseries and care homes away from polluted areas; siting living accommodation away from roadsides

Policy SU9 (Noise, pollution and nuisance) of the Brighton and Hove Local Plan (2005) addresses the need to site permanent accommodation away from polluted areas; it states that planning permission will only be granted for development on a site adjacent to an existing pollution / nuisance generating use and / or within an air quality 'hotspot' or potential 'hot spot' if the effect on the proposed development, its occupiers and users will not be detrimental, and effects can be mitigated.

There is no provision which specifically restricts developments for vulnerable groups away from roads, but this is considered as part of the development management process. However, the limited number of sites available for development means that it is not always possible to site new developments away from areas with poor air quality.

Avoiding creation of street and building configurations that encourage pollution build-up

This is considered during the design stages of the development management process, and can be addressed during a Health Impact Assessment.

Including trees and vegetation in open spaces or as green walls or roofs

QD16 - Trees and Hedgerows of the Brighton and Hove Local Plan (2005) requires that new developments must seek to retain existing trees and hedgerows, and wherever feasible include new tree and hedge planting in the proposals. **City Plan Part 2** will take forward a similar policy.

4.2 Development management

Incorporate air quality into travel plans

City Plan Policy on Sustainable Transport (CP9) commits to: Ensuring all new, major development schemes submit a **Transport Assessment** to identify effects of the demand for travel they create, and include measures to mitigate impacts by reducing car use, implementing agreed **Travel Plans** (which outline sustainable travel plans for new developments), and making appropriate contributions towards sustainable transport.

Atmospheric Dispersion Models are used by developers, to predict the impact of changes in traffic emissions caused by new developments, the results of which are reviewed when applications are submitted.

Environmental impact Assessments are conducted where appropriate.

Developing local parking plans

Local Parking Plans: Parking Standards (SPD[5] 14) outline the maximum number of parking spaces in new developments, and the minimum number / proportion of EV parking places for new developments. An update of SPD14 would be required in order to encourage 100% EV-ready infrastructure.

CPZ parking areas can be used to discourage driving to work / car-use and use permit pricing to encourage the purchase of vehicles with better emissions**:** New CPZs (controlled parking zones) have been developed and delivered, and existing TROs (traffic regulation orders) and CPZs have been amended.

Include air quality monitoring and measures to reduce road-traffic emissions in the Regulation 123 List of funding options for the CIL [6]

The Community Infrastructure Levy (CIL) will allow funds to be raised from new developments for strategic infrastructure which supports growth, with details outlined in the **Infrastructure Development Plan Update** (2017). The type of infrastructure projects that may be funded through CIL is set out in the **Regulation 123 List** and could include renewable and low carbon decentralised energy systems schemes and installations, carbon reduction and energy efficiency measures; air quality management measures can also be considered. **City Plan Policy 7 (CP7):** Infrastructure and Developer Contributions identifies the relevant areas for developer contributions.

4.3 Support zero and low emission travel

Develop an integrated public transport network based on low emission vehicles

City Plan Part 1 states that development will be focused in the most accessible locations and encouraging development around transport hubs.

There is one Park and Ride facility at Withdean (90 spaces), but there is no city-scale/wide Park and Ride. The city council works with bus operators via the Quality Bus Partnership to deliver this work.

Through the LTP and the work done on walking and cycling infrastructure (the LCWIP), sustainable interchange between different transport modes is encouraged. E.g. the bike hub at Brighton Station, created in partnership with Network Rail.

[5] Supplementary Planning Document, which provides detailed guidance on how planning policy will be implemented

[6] Contributions from developers are currently secured through Section 106 for highways, transport improvements, community/recreation facilities, education, health and affordable housing. Some of these items will be replaced by CIL when it comes into effect (in 2020), though Section 106 will be used to address site specific impacts and areas such as affordable housing.

Provide charging infrastructure for zero and low emission vehicles:

- Provision of charging facilities is supported in City Plan Part: Sustainable Transport Policy (CP9).
- BHCC has forty public charge points, with allocated parking spaces. Charging points can be viewed on ZapMap, which shows their locations and availability.
- For new developments, SPD14 on Parking Standards (2014) sets out the minimum number / proportion of EV parking places for new developments. CP9 (Sustainable Transport) states that new developments should incorporate new technologies such as EV charging points. It is anticipated that CIL will start in 2020, and could support infrastructure for EV.
- There are plans for all council contracted car parks are to have EV charging points. Potential bids for OLEV (Office for Low Emission Vehicles) funding will increase charging point provision in areas without off-street parking (providing charging facilities for electric vehicles in workplaces, commercial developments and residential areas).
- The Better Brighton and Hove think tank is developing a business model for the establishment of public EV charging points. The areas being considered include:
    - Using streetlamps for on-street charging. Funding is available from OLEV, and work has started to identify the lampposts (location, power supply and upgrade status).
    - Installing charging points in car parks. There is no immediate funding available for this; use of the commercial market is being considered.
    - Creating rapid charging hubs for taxis. Scoping potential locations, power supply and funding for this has started.

Other strategies to encourage zero and low emission travel include:

- **City Car Clubs:** The City (Enterprise) Car Club has good use in city centre. This is supported by council which permits centralised parking bays for these cars. Council employees receive a 20% discount.
- **Bike share schemes**: A successful bike share scheme was introduced in September 2017 (BTN Bike share).
- **Sustainable travel discounts/loans for council employees**: Discounts on Brighton and Hove buses, interest free loans for bus/train tickets and bikes / cycling equipment, 'easit' card to save money on bus, train and cycling; bicycle mileage allowance (20p/mile) and discounted membership of City Car Club, are available to Brighton and Hove City Council employees.

4.4 Clean Air Zones and Low Emission Zones

Consider introducing a Clean Air Zone (CAZ) that restricts or charges certain classes of vehicle, supports zero/low emission travel and includes targets to progressively reduce pollutant levels below EU limits and meet WHO air quality guidelines

While Brighton & Hove has no Clean Air Zone in place, the following section provides an update on the Bus Low Emission Zone and AQMA (Air Quality Management Area).

Bus Low Emission Zone

A bus Low Emission Zone (LEZ) has been in place since 1 January 2015 between North Street and Western Road; it includes North Street and Western Road and covers 98% of bus movements in the city. By January 2020, buses can only enter the LEZ if they meet Euro-V standards; however they are scheduled to meet the Euro-V tailpipe emission standards a by 2019. There are certain exemptions for very low frequency routes, and the LEZ includes conditions such as an engine switch off policy.

The Clean Vehicle Transport Fund (from DEFRA, Department for Environment, Food and Rural Affairs) resulted in 73 buses and 21 minibuses/taxis having exhaust retrofits for lower NO_X (NO and NO_2). Public and private funding will support the conversion of nine diesel buses to electric. Brighton & Hove Buses have also procured more than 80 buses which exceed the Euro VI emission standard. Further funding is required for all frequent buses to meet or surpass the much cleaner Euro VI emission standard.

A report is being produced on the impact of the LEZ since 2015 and will consider next steps required to address air quality; the transport team is consulting with eight bus companies regarding better options for further measures, which could include (for example) bringing forward the Euro VI zone, expanding the vehicle type, introducing Clean Air Zones and expanding existing anti-idling policies.

A report on the Low Emission Zone will be presented to the Environment Transport & Sustainability Committee and Licensing Committee (as appropriate) during 2018, which will include:

- Further consideration of taxi and minibus licencing within the AQMA and further afield.
- Consideration of a Clean Air Zone, which would extend existing restrictions already applied to buses and coaches. 21 minibuses/taxis have already been retrofitted to lower NO_x emissions.

Air Quality Management Area

BHCC has been monitoring air pollutants continuously since the mid-1990s. There are 66 active monitoring sites (100 including archived ones) representative of the air quality in the city centre, Rottingdean, Portslade, Hove and north of Preston Circus.

The city has had an Air Quality Management Area (AQMA) since 2004. The council declared an amended AQMA on 30 August 2013. The Air Quality Management Area is in place where

EU/WHO limits for nitrogen dioxide (NO_2) are at risk of not being met. Councils have statutory duties for air quality set out in Part IV of the Environment Act 1995; in areas where this is failing local authorities are obligated to deliver more stringent air quality action plans to work towards compliance as soon as possible. Actions to address poor air quality are addressed each year in the Air Quality Action Plan[7] update within the Annual Status Report (ASR) on Local Air Quality.

The **Air Quality Action Plan (2015)** and **ASR updates** outlines actions to reduce emissions and exposure to ambient air pollution within the Air Quality Management Area; the limits and guidelines in this plan are all related to ambient air quality. **The Local Transport Plan 4** and subsequent updates will address junction improvements and traffic management in the AQMA.

Address regional air quality by preventing migration of traffic to other communities

- Environment and Public Health departments are working with adjacent and nearby local authorities through the Sussex Air Quality Partnership.
- The Air Quality Specialist carries out air quality assessments and source apportionment across BHCC, Lewes and Shoreham and there is scope to share actions and strategies for air quality improvement across these centres.
- The Transport Department are working with adjacent local authorities (e.g. Lewes District Council and East Sussex County Council) and participating in emergence of TfSE (Transport for the South East Partnership) as a Sub-National Transport Body.

Encourage low-emission transport within the clean air zone

- **Introduce no vehicle idling areas** (through bylaws); there are no anti-idling zones, but this could be considered in the AQMA loading bays and junction approaches. However, school frontages have yellow zig-zag lines (no stop zones) and around 100 anti-idling signs and signs requesting drivers to cut engines have been put up around Brighton & Hove.
- **Minimise congestion caused by delivery vehicles:** CP9 states that the council will establish a Freight Strategy that will create an efficient system and network for delivery vehicles, to support economic growth particularly local business and assist in reducing the impact of goods vehicles on the city's environment. The Freight Strategy isn't in place yet, but LTP4 (which runs to 2018/19) commits to working with companies to develop a routing, delivery and servicing strategy for goods and freight vehicles, including exploring possibilities for 'cleaner' last mile deliveries. The next version of the LTP will also include a Transport Carbon Reduction Plan which will include measures to reduce emissions from delivery vehicles.
- **Specify emission standards for private hire and other licensed vehicles**: 21 minibuses/taxis have been retrofitted to lower NO_x emissions.

[7] Annual status reports can be seen at http://www.brighton-hove.gov.uk/content/environment/noise-and-pollution/air-quality-management-city

4.5 Reduce emissions from public sector transport services and vehicle fleets

Use a fleet recognition system to improve efficiency by reducing fuel consumption and emissions; e.g. that recognises which operators meet best operational standards

The use of vehicle tracking systems (and driver behaviour to reduce emissions) is promoted on all new fleet vehicles; to date just over 100 vehicles have CMS Supatrak fitted. However, there are a number of departments who have said that they do not want this on their vehicles for a variety of reasons.

Driver training (include fuel-efficient driving in any test conducted when appointing or appraising driving staff; train staff drivers to reduce vehicle emissions; introduce in-vehicle elements to provide information on current fuel efficiency, appropriate gear selection and speed, or next day information about driving style)

Currently there is no specific driver training programme, other than the Driver Certificate in Professional Competence (DCPC) which is an annual 7 hour training on aspects such as fuel efficient driving, health and Safety, defect reporting etc for drivers who operate vehicles over 3.5 tonnes Gross Vehicle Weight (GVW - the vehicles that use most fuel in the Council).

Monitor fuel efficiency of drivers within fleet, and evaluate impact of fleet fuel consumption on air pollutant emissions

This is not currently carried out.

Make low emissions (N02 and PM2.5) one of criteria for routine procurement decisions

Fleet specifications require Euro six emission standards or alternative technologies such as Electric or hybrid. In addition the scoring for tenders asks for low or lowest CO_2 emitting vehicles, the lowest getting the highest marks and a reducing proportion thereafter for the ones ranked lower.

4.6 Smooth driving and speed reduction

Consider promoting a smooth driving style by using speed limits, real-time information on optimum driving speed, 20mph limits, and signs that display a driver's current speed

As acknowledged in the **City Plan (Policy CP9),** the council has introduced 20 mph speed limits across the majority of local/residential communities in Brighton & Hove. The 20pmh-limit area was implemented without vertical deflection (humps and bumps), to discourage unnecessary decelerations and accelerations (which can increase emissions).

CP9 (Sustainable transport) states that the council will continue to develop and implement **Intelligent Transport Systems** which will improve the way the **highway network** is managed in real time to reduce congestion (by enhancing the current network of traffic signals, expansion of CCTV, Automatic Number Plate Recognition (ANPR) cameras and updating and extending the city's existing Urban Traffic Management and Control System (UTMC)). The

investment has taken place with a number of junctions being upgraded to MOVA (Microprocessor Optimised Vehicle Activation – a traffic control system designed to maximise junction/crossing efficiency), enabling optimisation of the timings to reduce delays. Journey time monitoring devices and CCTV installations have been installed to provide the control room with the tools to improve the way incidents are managed to reduce delays in the city.

To date, there are no real time second countdowns for traffic lights turning green (these encourage motorists to turn off whilst waiting).

4.7 Active travel (walking and cycling)

All relevant policies, strategies and plans should consider walking and cycling

City Plan Part 1 specifically encourages active travel and promoting cycling and walking and encourages new developments to promote sustainable travel. Part Two of the City Plan will also address this issue. CP9 (Sustainable Travel) refers to:

- Implementing an integrated cycle network by 2030: An integrated cycle network is not yet fully in place, however an LCWIP (Local Cycling and Walking Infrastructure Plan) is now being developed. This will be based on the national Cycling and Walking Infrastructure Strategy and will identify potential infrastructure improvements, including consideration of an integrated cycle network.
- Promote cycling and walking as 'active travel' by providing advice to residents, workers and visitors to the city: see below for more details.
- Encouraging more journeys by sustainable transport by supporting development of school, workplace and personalised travel plans: See below for more details.

Address infrastructure issues that may discourage people from walking or cycling; and provide a choice of cycling routes, which avoid highly polluted roads.

For new developments, this can be addressed through the development management process outline above.

The Council's Transport Capital Programme (for implementation of the Local Transport Plan) enables and benefits walking and cycling through improved infrastructure, such as improved road surfaces to benefit cyclists, cycling parking infrastructure, cycle lanes, pedestrian crossings, way-finding signage, improved footways, and road safety schemes).

The LCWIP which will be developed will drive the development of infrastructure improvements, including consideration of an integrated cycle network.

Foster a culture that supports physically active travel for journeys to school (for staff, parents and students) and during the school day

The Access Fund (managed by the Transport Department, and running until March 2020) is designed to support Primary and Secondary schools to develop travel plans (with accreditation), as well as providing scooter, cycle and pedestrian training for school children.

For Early Years Settings (EYS) a travel plan accreditation system is in place (Modeshift STARS accreditation) to engage with parents and children from the start of their education; the SMILE (speak, move, imagine, learn, enjoy) project & booklet has also been developed for primary schools and EYS. A school active travel strategy (which is a statutory requirement) has also been published in the form of a booklet for parents. Early Movers practitioner training is also available, to help practitioners extend the physical activity opportunities available to the under-fives in their care. The Active Travel with Young Children project is designed to encourage parents to travel actively with their young children, including becoming involved in Walk to School Week, and a Meerkat walking trail has been designed and is appropriate for young children.

Support behaviour change by supporting individuals to develop travel plans, and ensure individuals who do walk are supported to do so

The Access Fund project conducts Residential Personalised Travel Planning. These are door to door visits focused on streets with greater need, to support the unemployed or those who are job hunting to travel to work or interviews. It provides information and support on looking for work, offers of wet weather gear, bus passes, cycling training and maintenance as part of a written agreement.

The Healthy lifestyles team within the Public Health Team runs the following programmes/activities:

- Health trainers: individuals can be referred or self-refer to receive up to 6 weeks of 1-2-1 support to increase their level of physical activity, including supporting active travel.
- Health Walks is an award winning scheme, which offers free walks led by trained Volunteer Walk Leaders and accessible by public transport. There are 18 regular walks across the city, with lengths ranging from under a mile up to three miles.

Promote walking and cycling in and around the workplace

- The Transport Department, under the Access Fund, delivers an Active Travel Partnership/Forum which works with local businesses to create Travel Plans for staff active travel, and to promote a healthier workforce.
- Council staff can access benefits including interest free loans for bikes/cycling equipment, ‘easit’ card to save money on cycling; bicycle mileage allowance (20p/mile).

4.8 Awareness raising

Take action to raise awareness of road side traffic pollution

- Air Alert is a service provided by the Sussex Air Quality Partnership (SAQP), which will send free messages to mobile or home telephones of people who register, with information about predicted poor air quality across the region. https://www.airalert.info/Splash.aspx

The following are recommended but no action is currently in place:

- Ensure healthcare professionals are aware that information on air quality is available, what it means for patients and what actions are recommended (including vulnerable groups and what to do when outdoor air quality is poor).
- Provide information on air quality via local, national and social media, during for example, weather forecasts.
- Public information initiatives to raise awareness and inform on health impacts air pollution; air quality inside vehicles; how to reduce individual air pollutant emissions and exposure. E.g. Car-free days or National Clean Air Days.
- Give businesses information on how they can reduce road-traffic related air pollution and improve fuel efficiency.

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