APSE Energy
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Air Quality Planning Guidance for Lancashire

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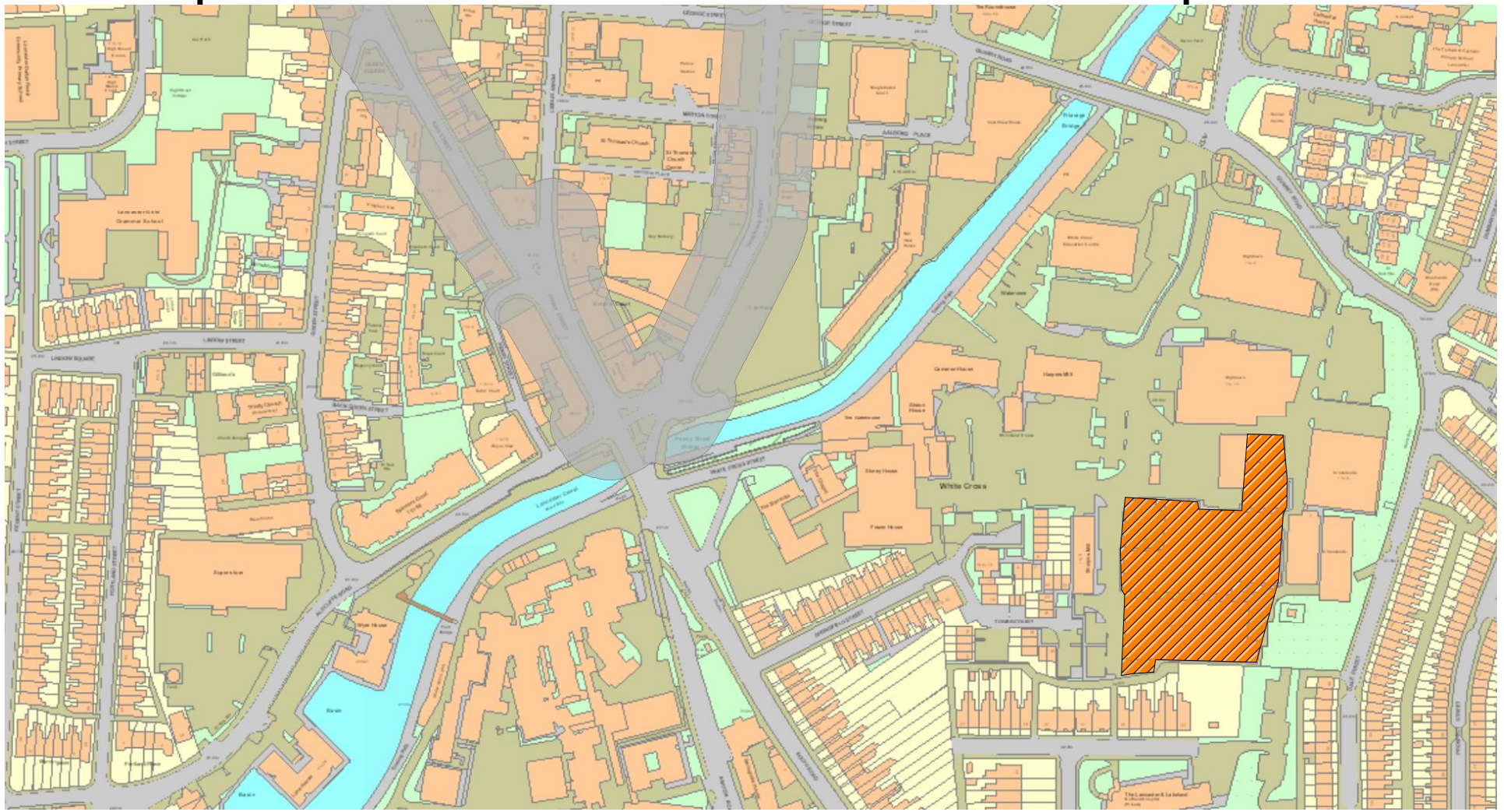
LANCASTER CITY COUNCIL
Promoting City, Coast & Countryside

EHL
Environmental Health Lancashire

Low Emission Strategies
Building on Good Practice

Example of Possible New Development

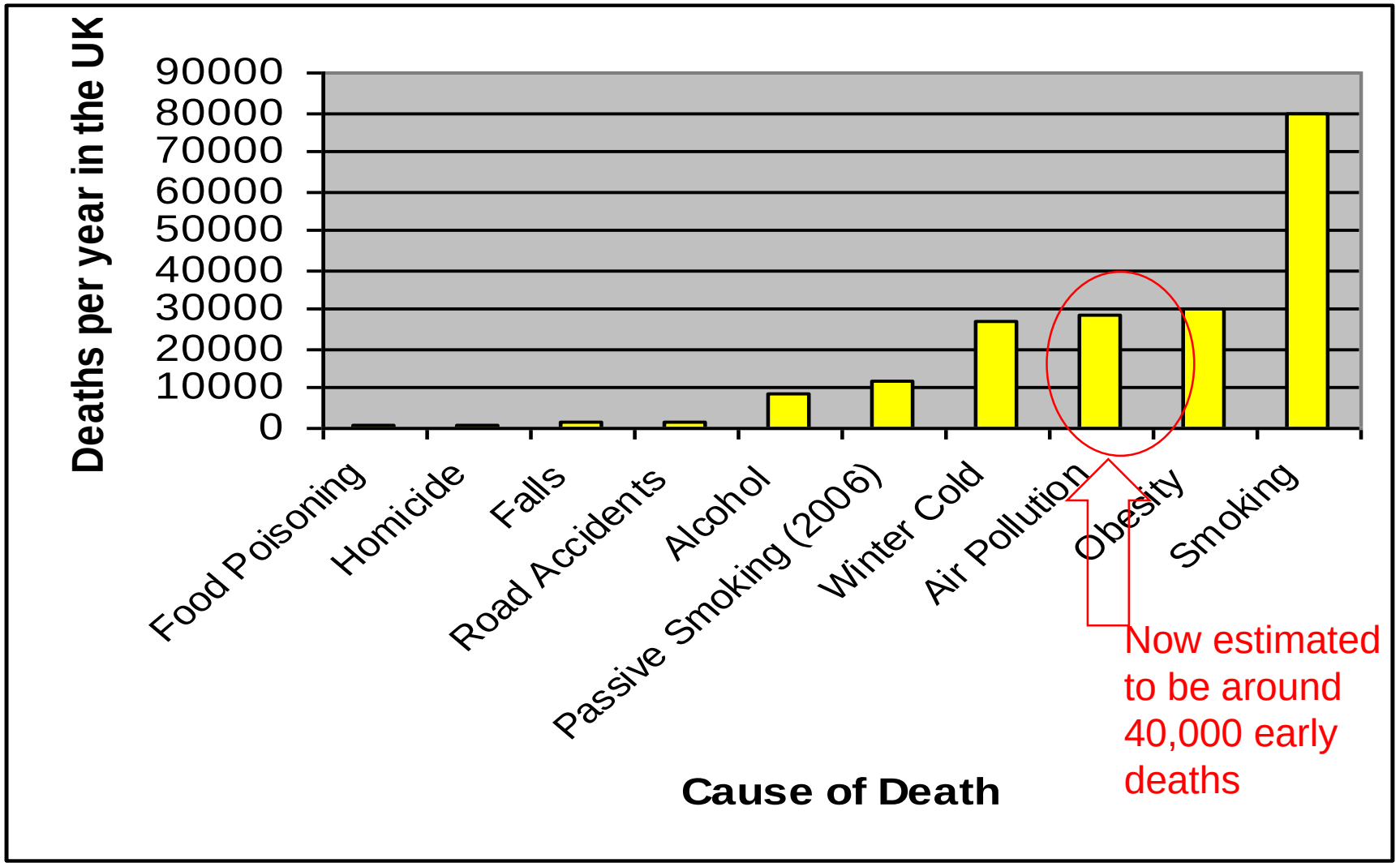


AQ and Planning – How is usually works – Traffic impact

- Application submitted with assessment as AQ flagged as issue e.g. housing development for 500 houses impacting on AQMA (traffic)
- Assessment indicates a worsening of air quality as a consequence of the development (traffic related). Some of the impact is on an AQMA.
- Some indication of significance is offered (usually referring to EPUK guidance)
- Some mitigation is offered (e.g. travel plan, EV charging, cycling measures….. Possibly a contribution to wider measures if more significant impact
- Development is approved or refused based AQ impact (usually approved as planners consider many things to balance in addition to AQ)
- Development proceeds - LA has obtained something AQ related but not sure exactly what (effectiveness of mitigation and residual AQ impact is rarely provided). Outcome perhaps better than many though?

So why not carry on like this?

Impact of Air pollution in UK



Source - Air Quality Strategy for Lancaster http://www.lancaster.gov.uk/environmental-health/environmental-protection/air-quality/air-quality-reviews-and-assessments

Kent High Court Decision (Gladman v CPRE appeal case)

- CPRE Kent led case (Campaign to Protect Rural England) –not council
- Gladman wanted to build over 500 homes - impacted on 2 AQMA's
- LA (Swale) refused permission, Gladman appealed eventually to High Court.
- Gladman had offered £311K as mitigation based on Defra AQ damage costs
- The inspector/High court rejected this as ' the contributions have not been shown to translate into actual measures …to reduce emissions'.
- This decision reinforces the often belittled importance of AQ in planning decisions and also directs that any mitigation should be shown to effective

So there is a need for a better approach

Why have a regional (or national?)approach to air quality planning guidance?

- Road Transport is currently where the main problems are. Road transport is a regional as well as a local issue.
- Air pollution does not respect boundaries
- Regional approach supports a stronger position on requirements and measures
- Consistent approach makes it easier for developers to accept and understand
- All things being equal, it discourages developers selecting ‘easy’ areas with no or little AQ requirement.
- Air Quality issue need addressing

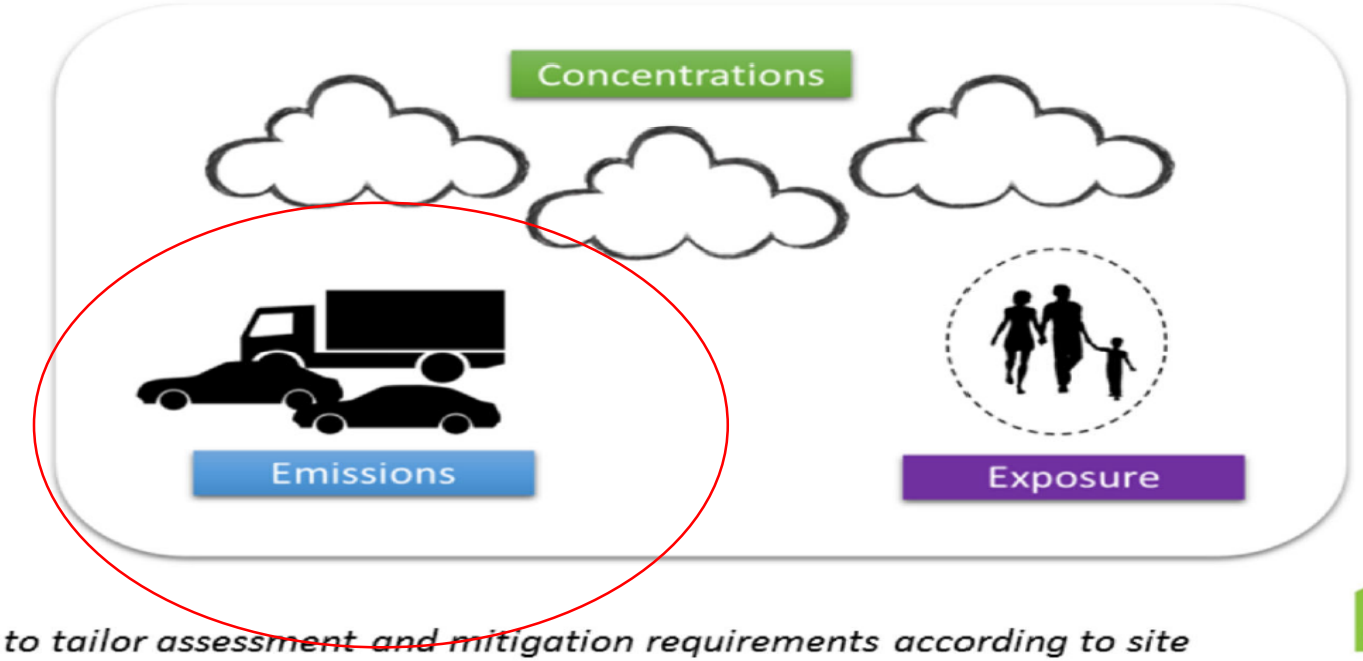
…….and also

- Air quality impacts are usually cumulative. So it is important to minimise all pollution contributers (large and small)
- To ensure developments causing or adding to AQ Objective exceedances are not the only developments where pollution reducing measures are needed
- To give air quality improvement the best chance given other planning pressures and particularly development viability issues (NB needs supporting policies behind guidance)

What are the aims of the guidance?

Aims

Encourage developers to support action through the planning system to improve air quality, lower transport emissions and protect public health.



And to tailor assessment and mitigation requirements according to site characteristics, relating both to the nature and scale of the associated impacts and risk.

Low Emission Strategies
Building on Good Practice

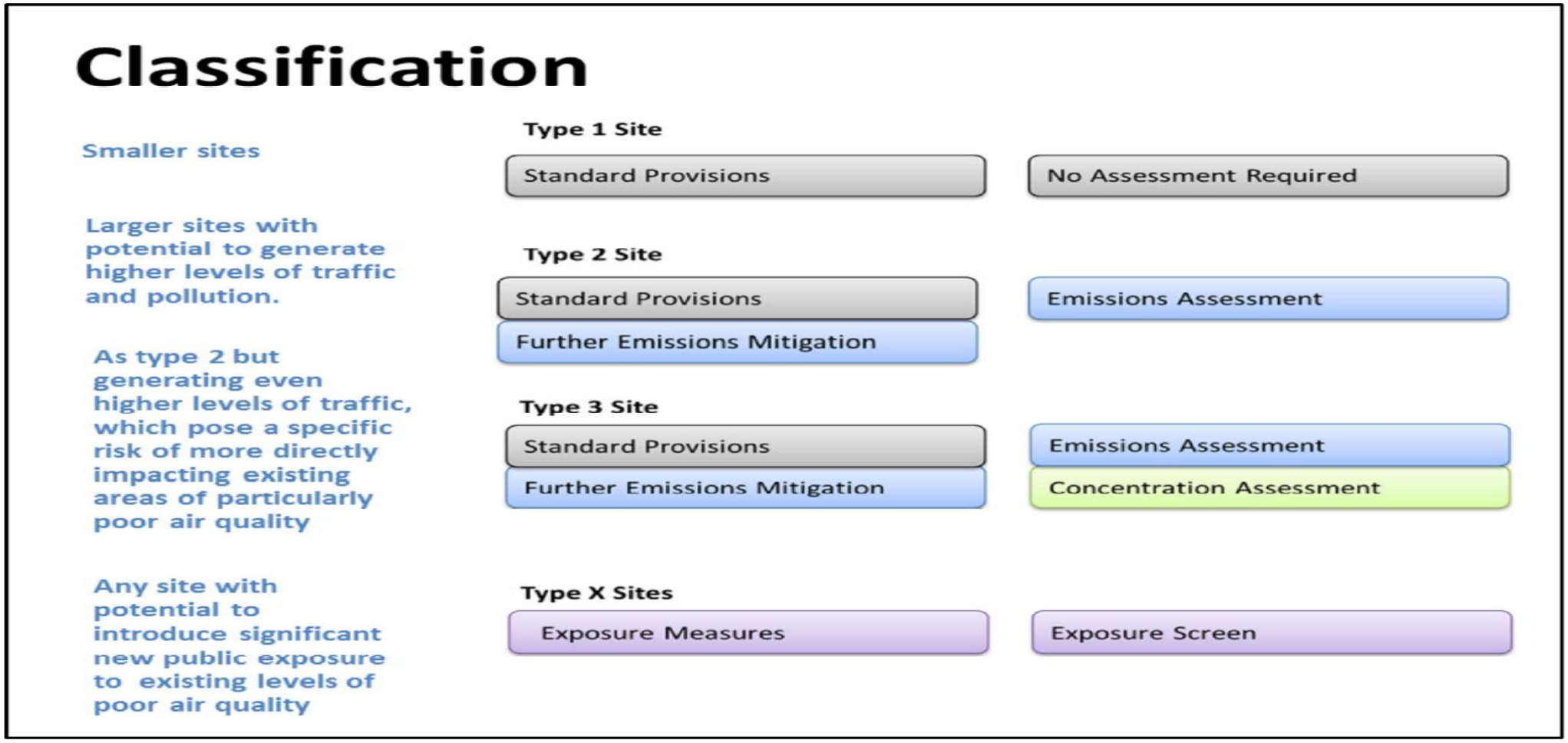
What are the main elements of the guidance?

What makes it different? 4 main differences :

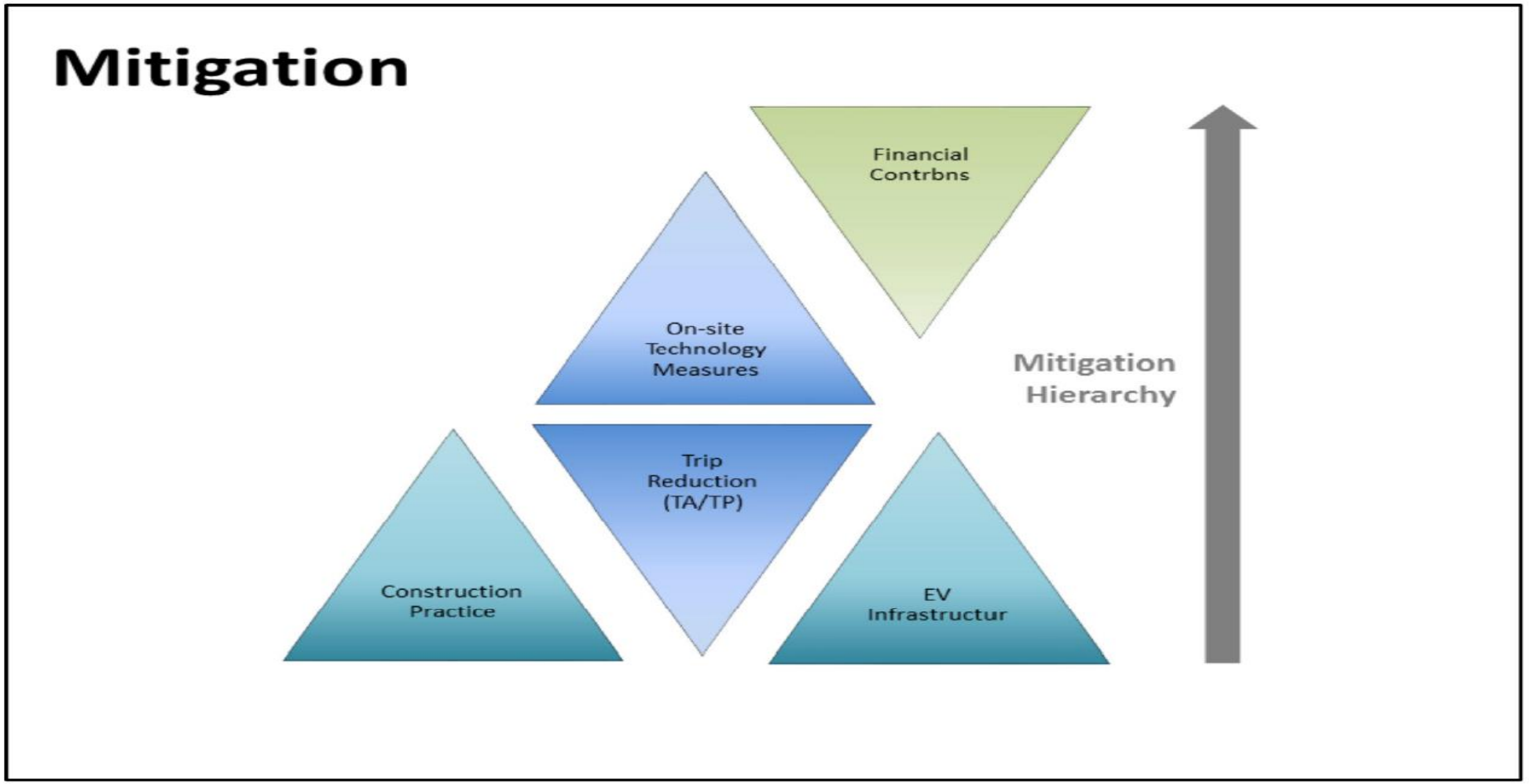
1. Standard Requirements for all transport generating development :

- Charging facilities for electric vehicles
- https://www.youtube.com/watch?v=Kxryv2XrnqM&feature=youtu.be (‘Clean Disruption’ – worth a look)
- Construction impact mitigation

2. Classification of development sites and new emission assessment requirements :An assessment process that provides a better description of impact and the effect of any mitigation.



3. Assessed Mitigation - Assessment method drives better mitigation and to use contributions to fund air quality measures (where mitigation alone is insufficient)



4. Interpretation of results - better structure/better information

Tests and Evidence

Meets standard mitigation provisions	
Provides balanced and proportionate emissions mitigation	Emissions Assessment
Avoids unacceptable direct impact on local concentrations	Concentration Assessment
Avoids the introduction of new unacceptable exposure	Exposure Assessment

Interpretation of Concentration Assessment Results

Traditional (graduated fine control)

Concentration with development	% Change in air quality relative to Air Quality Assessment Level (AQAL)			
	<1	1-5	5-10	>10
75% or less of AQAL	Negligible	Negligible	Slight	Moderate
76-94% of AQAL	Negligible	Slight	Moderate	Moderate
95-102% of AQAL	Slight	Moderate	Moderate	Substantial
103-109% of AQAL	Moderate	Moderate	Substantial	Substantial
110% or more of AQAL	Moderate	Substantial	Substantial	Substantial

(Ref: EPUK, Dec 2014)

Low Emissions (back-stop control)

An increase of 5% or more of the corresponding limit value is cause for concern.

If the impact occurs within an AQMA, or would of itself lead to the potential creation of a new or extended AQMA, this indicates a severe impact on local concentrations.

Severe impacts are likely to lead to objection and refusal.

Arising Air Quality Planning Recommendation

Applying The Tests

For Townsland Park - a large central business-led mixed-use development

Tests		
(1)	Meets standard provisions for mitigating emissions	
(2)	Provides balanced and proportionate emissions mitigation	
(3)	Avoids unacceptable direct impact on local concentrations	
(4)	Avoids the introduction of new unacceptable exposure	
Scenario 1 - on-site measures, plus contribution (as previous slide)		
(1)	CEMP and EV requirements met	Met
(2)	13% on-site and 76% total mitigation credit proposed	Met
(3)	No significant impact on local concentrations	Met
(4)	No new exposure concerns	Met

What next ?

Local Authority	Option 3 (Full Guidance as SPD)	Option 2 (Standard measures + Mass Emission Assessment + Concentration Assessment)	Option 1 (Standard Measures + Concentration Assessment)	Planning Advisory Note (as either option 1 or 2)	Other
Hyndburn	No decision yet	No decision yet	No decision yet	No decision yet	-
Ribble Valley	No	No	No	No	Own SPD Guidance
Burnley	Yes	-	-	-	-
Pendle	No	-	-	Yes (2)	-
Wyre	No	Yes(?)	Yes(?)	Yes (1or2) Interim	-
West Lancs	No	No	No	No	Own SPD Guidance
Lancaster	Yes	-	-	Yes(2) Interim	-
Blackburn	Yes	-	-	Yes(2) Interim	-
Blackpool	Yes	-	-	Yes(2) Interim	-
Preston	Yes	-	-	Yes(2) Interim	As Central Lancashire Guidance
Chorley	Yes	-	-	Yes(2) Interim	
South Ribble	Yes	-	-	Yes(2) Interim	
Rossendale	No decision yet	No decision yet	No decision yet	No decision yet	-
Fylde	No decision yet	No decision yet	No decision yet	No decision yet	-

Low Emission Partnership

- Currently led by York, Lancaster and Mid Devon Councils
- Defra Funding has been allocated for the partnership to develop information sharing system (reworking of Low Emission Hub http://www.lowemissionhub.org/)
- Bid has been made to Defra AQ Grant fund for 5 year programme of work to develop and promote new hub (funding now granted)
- Bid will add to body of knowledge to assist planning approach
- New members wishing to join LEP very welcome!

Any Questions?

- Useful links :-
- Low Emission Partnership http://www.lowemissionstrategies.org/
- Estimating local mortality burdens associated with particulate matter https://www.gov.uk/government/publications/estimating-local-mortality-burdens-associated-with-particulate-air-pollution
- AQMA maps https://uk-air.defra.gov.uk/aqma/
- EV future? https://www.youtube.com/watch?v=Kxryv2XrnqM&feature=youtu.be
- National AQ Plan (roadside NO2) https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017
- Air Quality Strategy for Lancaster available at : http://www.lancaster.gov.uk/environmental-health/environmental-protection/air-quality/air-quality-reviews-and-assessments
- My email address pcartmell@lancaster.gov.uk Tel 01524 582728

Glossary

- AQ – Air Quality
- AQMA – Air Quality Management Area
- ASR - Annual Status Report (Air Quality) to be submitted to Defra as part of Local Air Quality Management Review and Assessment process
- CO2 – Carbon dioxide
- NO2 – Nitrogen dioxide
- NOx – Nitrogen oxides
- PM10 and PM2.5 – Fine particulate matter that can enter the lungs.
- LEP – Low Emission Partnership