



**Hertfordshire County Council  
Public Health Service  
County Hall  
CH0231  
Pegs Lane  
Hertford SG13 8DE**

Louise St.John Howe  
Programme Officer  
Stevenage Borough Council Local Plan  
(2011-2031) Public Examination  
[Louise.St.JohnHowe@stevenage.gov.uk](mailto:Louise.St.JohnHowe@stevenage.gov.uk)

**Tel:**  
**Email:** bethan.clemence@hertfordshire.gov.uk

**01992 555363**

**Date:** 20 January 2017

Dear Louise,

**Stevenage Local Plan Examination In Public, Stage 2 Hearings.  
Matter 13: Air Quality**

**Hearing Statement, Public Health**

**Context**

Poor air quality impacts directly on health and wellbeing, particularly for the very young, the elderly and those already vulnerable with existing health conditions. The NPPF recognises that the planning system should contribute to preventing both new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution (para 109).

- Modelled estimates suggest poor air quality (PM<sub>2.5</sub>) in Hertfordshire is responsible for over 500 premature deaths per year (in the over 25's age group): this equates to 5258 life years lost (potential *years of life lost* due to premature death) due to PM<sub>2.5</sub> alone
- The biggest single cause of particulate air pollution in Hertfordshire is traffic emissions. This reflects the high levels of car ownership and the key strategic transport arteries which run through the County such as the A1, M1, M25 and A10.

The County Council has an approved Air Quality Strategic Plan for Hertfordshire (<http://www.hertfordshire.gov.uk/services/healthsoc/healthherts/healthyplaces/>) and this should be taken into account, particularly with regards the reduction of PM<sub>2.5</sub> which is included within the national Public Health Outcomes Framework (PHOF).

We are concerned that there is no stand-alone policy for Air Quality within the Local Plan that would place a requirement for consideration within future development both in terms of its impact on local air quality and also in terms of potential exposure of new and existing communities to poor air quality.

**Previous representations and subsequent developments**

In our previous representation to the Regulation 18 public consultation, we outlined a number of key concerns:

- That the draft local plan did not include a standalone policy on air quality.

- That a significant level development is proposed that should be considering air quality from an exposure and mitigation perspective. In particular, the proposed West of Stevenage development which is adjacent to the A1(M) should make reference to air quality mitigation in its supporting policy (HO2).

These concerns are still valid. However, since our response in January 2016, the air quality and health agenda has grown and is increasingly being seen as a priority at the national government level. Planning has a role to play in this and over the course of 2016 we seen a growing awareness of, and emphasis on, the need for design-led air quality mitigation through sensitively planned development.

In Hertfordshire:

- Presentations to the Hertfordshire Planning Group (Development Planning and Development Management Officer Groups) on the links between planning and air quality – delivered by Hertfordshire Public Health and the Chair of the Herts and Beds Air Quality Network.
- Agreement by the Hertfordshire Planning Group to nominate a planning representative to sit on the Herts and Beds Air Quality Network.
- Development of Air Quality and Planning Guidance (see table on page 2)

Nationally:

- the National Institute for Clinical Excellence (NICE) has very recently consulted on draft guidance for air pollution which includes a focus on planning and mitigation through design. The expected publication is June 2017 – more detail is available at <https://www.nice.org.uk/guidance/indevelopment/gid-phg92>
- Recognition is growing of the cumulative impact of development and the potential for multiple small scale developments to impact on local air quality, particularly when combined with larger neighbouring developments.
- There is a need to move away from air pollution modelling being used to define the need for air quality mitigation associated with development. With the exception of major scale developments (EIA scale development) such modelling will 99% of the time require no air quality mitigation and even for some major scale developments will reach the same conclusion.
- Mitigation is generally considered in terms of the impact of a development on local air quality (largely through the introduction of greater vehicle movements) and thus responses will generally focus on sustainable transport options. However, 'mitigation' also needs to set out a clear approach with regards to exposure and introducing receptors (residents) to an area of poor air quality, with a focus on design-led solutions. It should also set parameters for circumstances where a development results in the need to designate or extend an Air Quality Management Area.
- Detailed Air Pollution Modelling should still be required for Major developments to ensure that more mitigation, additional to the default for such developments, is required where 'adverse impacts' are actually predicted.

Therefore, the expectation should be that holistic air quality mitigation is required of all developments, regardless of scale. There is good practice in existence and in use in the Black County and in West Yorkshire and a number of Local Authorities in Hertfordshire are also implementing such an approach through the inclusion of guidance within their draft Local Plans.

Local Authority	Approach	Stage of Local Plan
North Hertfordshire District Council	Air Quality and Planning Guidance referenced within Air Quality Policy of Local Plan <a href="http://www.north-herts.gov.uk/home/environmental-health/pollution/air-quality/air-quality-and-planning">http://www.north-herts.gov.uk/home/environmental-health/pollution/air-quality/air-quality-and-planning</a>	Pre-submission
East Hertfordshire District Council	Air Quality and Planning Guidance referenced within Air Quality Policy of Local Plan (Chapter 24) <a href="http://www.eastherts.gov.uk/presubmissiondistrictplan">http://www.eastherts.gov.uk/presubmissiondistrictplan</a>	Pre-submission
Sandwell Metropolitan Borough Council  Wolverhampton City Council  Dudley Metropolitan Borough Council  Walsall Council	Black Country Air Quality Supplementary Planning Document (SPD) <a href="http://www.sandwell.gov.uk/downloads/file/23699/black_country_air_quality_spd_draft">http://www.sandwell.gov.uk/downloads/file/23699/black_country_air_quality_spd_draft</a>  Air Quality Supplementary Planning Document Adoption Statement <a href="http://www.sandwell.gov.uk/downloads/file/24566/air_quality_spd_-_adoption_statement">http://www.sandwell.gov.uk/downloads/file/24566/air_quality_spd_-_adoption_statement</a>  The SPD supplements Policy ENV8 (Air Quality) of the adopted Black Country Core Strategy (2011), and embraces the West Midlands Good Practice Air Quality Planning Guidance (2014), produced as part of the West Midlands Low Emissions Towns & Cities Programme.	Adopted 2016
Wakefield Council	Development Policy D20 of Core Strategy <a href="http://www.wakefield.gov.uk/residents/planning/policy/local-plan">http://www.wakefield.gov.uk/residents/planning/policy/local-plan</a>  Supported by Air Quality and Emissions Technical Planning Guidance <a href="http://www.wakefield.gov.uk/residents/bins-and-environment/environmental-health/air-quality">http://www.wakefield.gov.uk/residents/bins-and-environment/environmental-health/air-quality</a>	Core Strategy adopted 2009

## Recommendations

It is recognised that the Borough does not currently have an AQMA which necessitates the preparation of a management plan; however this position could change in the future – particularly in the context of anticipated growth - and therefore the inclusion of an air quality policy in the Local Plan is important.

To ensure the Local Plan is positively prepared, we would expect to see sensitively planned development which adopts a design-led approach in the consideration of air quality. In particular:

- A stand-alone policy for Air Quality which defines the Council's expectations of developers to ensure a consistent approach and sets criteria for when an Air Pollution Assessment is required and a range of mitigation options (for both impact and exposure). This policy should cover all development.
- Policy HO2 should reference air quality as part of the criteria for development proposals, and this should focus on appropriate mitigation options as a requirement for permission. During masterplanning of this site, consideration should also be given to the spatial location of certain facilities such as the primary school, playing fields and sheltered housing in the context of exposure to poor air quality.

- A number of Hertfordshire's planning authorities are referencing Air Quality and Planning Guidance documents within their Local Plans. This guidance sets out a clear approach with regards to exposure and introducing receptors (residents) to an area of poor air quality. It also sets parameters for circumstances where a development results in the need to designate or extend an Air Quality Management Area, with the principle of refusal of planning permission on local air quality grounds considered a viable option. It is recommended that the local authority adopts a similar approach, and liaises with the Herts and Beds Air Quality and Herts Environmental Health Networks for examples of how this has worked elsewhere.

Yours sincerely,

**Bethan Clemence**  
**Health Improvement Lead – Planning and Place**  
**Public Health, Hertfordshire County Council**