

Principles for Assessing Air Quality Impacts of Development Sites

1 Background

- 1.1 The Partnership published joint guidance with Defra on low emission planning in Jan 2010 and a supplement the following year. These documents promote a practical approach towards reducing air quality impacts and strengthening associated mitigation within the planning process (the 'LES approach').
- 1.2 Since this time, various authorities and groups have developed or adopted local policies and guidance, which reflect some or all aspects of the LES approach. These experiences indicate that while it is possible to do so while remaining consistent with a more traditional AQ and planning approach (i.e. as described within current EPUK guidance) this can lead to:
 - (i) heavier burdens on developers at the impact assessment stage
(e.g. requirement to undertake multiple types of impact assessment)
 - (ii) ambiguity as to how to reconcile and apply the results of different types of assessment
(e.g. 'no significant' impact on concentrations versus 'significant' impact on emissions)
- 1.3 These difficulties arise in part due to a lack of clarity and consensus at the point where the documents overlap. The aim of this note is therefore to present a set of principles, which when read alongside both the respective LEP and the EPUK guidance, provides coherence for developing and applying local level planning policies on air quality.
- 1.4 It is understood that EPUK are currently updating their current guidance. Once revisions are known, the LEP will review this integrating note to taking any changes into account.

2 Principles

Assessment Terminology

- 2.1 Five distinct types of air quality related impact assessment may help to inform the planning process. They are differentiated by the end points or 'indicators' they focus on:
 - (i) Health
 - (ii) Exposure
 - (iii) Concentrations
 - (iv) Emissions
 - (v) Activity
- 2.2 Traditionally the term '*Air Quality Assessment*' (or '*Air Quality Impact Assessment*') infers assessment of pollutant concentrations and exposure in relation to compliance with National Air Quality Objectives.
- 2.3 With increasing interest in alternative indicators of air quality impact, adoption of the more precise term '*pollutant concentration assessment*' helps to avoid confusion. And similarly, it is sensible to identify '*exposure assessment*' explicitly as a distinct assessment activity.

Significance Tests

- 2.4 The concept of significance plays an important role in planning appraisal. Traditionally the test for Air Quality impacts has centred on detecting changes to pollutant concentrations and on exceedences or otherwise of Air Quality Objectives. These are not however the only relevant indicator. In principle, significant impacts may be detected using any or all of the five impact assessment types listed in para 2.1, either individually or in combination.
- 2.5 An LPA needs therefore to establish clear policies with regards:
- (i) the type of assessment required in different situations, and
 - (ii) the significance tests and scales of impact, which will be applied, either independently or in combination.
- 2.6 Nationally recognised significance tests and scales of impact for changes in pollutant concentrations are well established (e.g. see EPUK guidance). Significance tests and scales of impact for other assessment types are beginning to emerge, but for the time being are less well developed overall. An LPA may therefore need to pay special attention to ensuring a transparent and well evidenced approach when adopting and applying the latter.
- 2.7 Use of alternatives to pollutant concentration as the sole test of significance are particularly important since assessing the latter is a relatively complex, costly method and one which only properly detects very significant impacts (i.e. reliance on this test alone creates the risk of a false negative), and tends, for example, to overlook the insidious effects of cumulative emissions.

Refusal and Mitigation

- 2.8 Some impacts may be so severe as to make a development unacceptable. For other sites the primary concern is to reduce detrimental impacts to the lowest reasonable level.
- 2.9 An LPA needs therefore to establish clear policies with regards:
- (i) the type/level of impacts likely to be considered so severe as to lead to refusal, and
 - (ii) the type/level of impacts for which it will be necessary to consider mitigation
- 2.10 Under the broader scope of significant impact defined in para 2.4, very few developments are without significant impacts relating to air quality. So, except for situations where the impacts indicate refusal, the majority of planning applications will need to consider the extent, specification and agreement of appropriate and proportionate mitigation.

Reducing Developer Burdens

- 2.11 Assessment requirements for a given site should be no more onerous than is necessary to assess significant impacts and establish appropriate mitigation. It is vital that an LPA use good sense by requiring only those assessments for which it is likely or possible that significant impacts will be detected. Noting the caveats of para 2.7, this is a particularly important consideration when requiring assessment of pollutant concentrations.