

## AIR POLLUTION PETITION – TILE HILL

Further to our discussion at Cabinet Member meeting on the 12<sup>th</sup> February 2018 please find below responses to the specific questions that were raised.

### 1.3.3 The Local Plan requires developers to carry out Air Quality Assessments and mitigate any air pollution risk, 'as appropriate'. **How is mitigation achieved and who decides what is appropriate?**

*Mitigation can be in the form of a number of options. The main methods are to promote the uptake of low emissions vehicles in the form of providing electric vehicle charging points, and to reduce car use by encouraging active transport (walking, cycling) and the associated public health benefits these bring and sustainable transport options such as public transport/car share schemes. Research has suggested that emissions from heating sources may contribute as much as 15% of total NOx emissions, so these are also considered, for example with the use of low NOx gas boilers.*

*Air Quality Supplementary Planning Document (SPD) is being prepared with first round of consultation due in July, will provide more detailed guidance to developers on mitigation options.*

### 1.4.2 The Council states that the overriding characteristics of the area do not raise immediate concerns around the risk of excessive levels of poor air quality. And yet, air quality tests in two sites off Charter Avenue in Canley (the nearest monitoring site to Tile Hill Village) show an increase in levels of pollutants from 28.7 in 2015 to 35.2 in 2016 and 31.3 to 34.9 respectively. There are no measurements for these two sites on the Council's web site currently for 2017? **What are the recordings for 2017 and is a further increase recorded?**

*We have only just received the December 2017 results from our laboratory that now completes the 2017 data set. These results now undergo a series of checks and calculations known as 'bias correction' that improves the accuracy of the diffusion tube results. The adjustment factors are not normally published by Defra until the end of March and will be available April 18.*

*As explained in the meeting, it is important not to draw conclusions by looking at short term trends in air quality data as results can be heavily influenced by the weather, and other localised temporary factors such as road works. We are aware the 2016 results were higher across the city and (whilst noting the results of the two sites referred to are still well below the national limit) believe this to be associated with the warm summer followed by the very cold winter, such weather often brings very low wind speeds and may even draw in air pollution from the continent. Windy weather by contrast encourages dispersion and dilution reducing pollution.*

- 1.4.3 Without there being measuring equipment in Tile Hill Village, it is not possible to assess whether or not air quality is an issue and whether or not this area is or will become the next hot spot. And in view of the increase in pollutants just mentioned in Canley, our close neighbour, we feel prevention is better than reaction.

However, we note that measurements taken on Dunchurch Highway and Broad Lane in 2015 were much reduced in 2016. ***What is the likely reason for this? Can this information help to reduce levels elsewhere in the city?***

*As noted above 2016 results were generally slightly higher. We do not know the precise reason but the reduction in pollution at the Dunchurch Highway and Broad Lane sites may be attributable to the improvement works that have taken place at this junction, and also the works at the Canley and Kenilworth Rd junctions along with the Toll Bar scheme. It is known that vehicle emissions are higher where traffic is 'stop-start' i.e. at traffic lights where there are frequent short bursts of acceleration.*

*Efforts to improve traffic flow at other key junctions around Coventry are underway led by our colleagues in the Highways Department and bids for further funding from Defra have been submitted to support this work. We are also using technological innovations to reduce congestion and improve traffic flow, this includes the electronic traffic signs that can direct traffic away from congested areas, mobile phone apps and are trialling a new device that can monitor traffic journey times, again to reduce congestion.*

*It should also be noted that there are initial signs that sales of diesel cars are falling.*

- 1.5.3 The Council says a range of options which support the reduction of air pollution will be considered, including traffic and sustainable infrastructure improvements, low emission technologies and behaviour change interventions targeted at reducing car usage. ***These are all well-meaning but are not achievable in the short to medium term, if at all, in the case of behaviour change interventions, partly because bus fares are far too high. Ironically, Tile Hill station is partly responsible for the increase in traffic into the area rather than a solution to it.***

*Under the Air Quality Plan that the council must submit to Defra, we are required to identify the measures that will achieve compliance with the limit for nitrogen dioxide 'in the shortest time possible'. It is too early in the process to say what these measures may consist of as we are still working very hard with our consultants to complete traffic surveys and air quality models that will help identify what vehicle classes (i.e. heavy goods vehicles, buses, cars) are causing the problem. This work is ongoing and there will be further traffic surveys undertaken during March.*

*The council has been awarded £1.2 million towards the installation of electric taxi charging points at key locations, the first of which are due to be installed early in 2018 and since the meeting we have learned that a joint bid by the council and TfWM has resulted in a further £1.5 million being awarded for retrofitting 104 National Express buses to Euro VI emissions standards in 2018/19. We will continue to bid for such funding as and when it becomes available.*

- 2.3. We are grateful that the petitioners' concerns have resulted in the inclusion of Tile Hill Village, in the next round of air quality monitoring. Without the necessary monitoring equipment in place it is not safe to say that this area shows no indicators of poor air quality at the moment.

*We believe we are already monitoring the worst junctions in the Tile Hill area i.e. those along the A45. Whilst we can make no guarantees, we are already looking at the possibility of locating 2 x diffusion tubes to monitor for nitrogen dioxide along Station Avenue/Cromwell Lane for an initial period of between 3 and 6 months. This would take place from April 18 subject to budget approval.*

*As part of the planning applications for new houses, we may also require developers to commission their own air quality monitoring to assist in identifying impacts of new development.*

- 4.1. **It is good to hear that the Air Quality Plan will be developed over the course of 2018 and we hope and trust that this will mean a monitoring station in Tile Hill Village as soon as possible.**

*The council has received £700,000 from Defra to help develop the Air Quality Plan. Unfortunately this funding does not include money for the purchase of monitoring equipment.*

*Defra have however indicated that future funding may be made available towards new monitoring equipment as we progress the Plan.*

- 5.1. We see however, that there is no budget to deliver additional monitoring stations at this time and new equipment would need to be purchased for which there is no budget. This is a surprise in view of the planned large-scale house building the Council is proposing in the Local Plan which has been known to the Council for some years - an important oversight. **According to the Council's web site, monitoring tubes are low cost which enables them to be changed every 4 – 5 weeks. Is this the same equipment that is used at a 'monitoring station'? If so, a lack of a budget will hopefully not be an issue.**

*Monitoring stations are very expensive to purchase and maintain costing tens of thousands of pounds. Diffusion tubes are indeed relatively low cost but we are looking at a number of sites where tubes may be required. Further tubes would have to come from existing budgets. .*

**Policy EM7 Air Quality item 2** states that major development proposals will require the submission of an air quality assessment, as they may lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment. The air quality assessment should address:

- a) The existing background levels of air quality
- b) The cumulative background levels of air quality (related to the cumulative impact of developments in the area).
- c) The feasibility of any measures of mitigation that would prevent the national air quality objectives being exceeded or, would reduce the extent of the air quality deterioration.

All major developments will therefore be required to undertake full air quality assessments. ***How can both a) and b) be done without local measuring equipment in Tile Hill Village and how is future air quality assessed?***

*Developers often use modelling to determine air pollution levels and what the impact of new development may be. This is based on known traffic levels and emissions factors from the various vehicle types, and predicted future traffic increases arising from a development. As stated above, where there is an absence of monitoring data developers may be required to undertake their own monitoring in order to verify that their model is accurate.*

**Exposure assessments will need to include an understanding of potential exposure to pollutants, as well as a proposal for mitigation measures such as:**

- **Designing buildings to ensure local people are less exposed**
- **Green areas are incorporated into development to help create barriers to pollutants.**

*The design of new buildings does not help residents living in old housing stock and, ironically, green areas that maybe helping to create barriers to pollutants have, are and may be built on.*

*Impacts to existing housing would have to be considered as part of an air quality assessment.*

**20mph Zone Petition** – is to be heard in March and is related in some ways as traffic speeds can have an effect on air quality and traffic speeds limited are regularly ignored for lack of enforcement.