

# Coventry City Council

Air Quality Supplementary Planning Document (SPD)

Regulation 12(a) Report of Consultation and Consultation  
Statement

December 2018

## **Introduction**

This report sets out the consultation that took place in the lead up to and during public consultation of the Coventry Draft Air Quality Supplementary Planning Document (in this document referred to as the Draft SPD) from Wednesday 8<sup>th</sup> August and Friday 21<sup>st</sup> September 2018. It reviews the consultation responses received, the number of representations made and a summary of the main issues raised by the representors.

This document has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 which requires that Local Authorities set out the persons the local planning authority consulted when preparing the supplementary planning document, a summary of the main issues raised with the consultation responses, and how those issues have been addressed. Once adopted, the Air Quality Supplementary Planning Document will form part of the Council's Local Plan

## **Background**

The Air Quality Supplementary Planning Document has been prepared to provide technical guidance and support to Policy EM7 of the new Local Plan. This will help deliver one of the overall objectives of the Plan which is to help improve air quality and wellbeing of Coventry people.

The Air Quality Supplementary Planning Document is aimed at individuals and organisations involved in submitting a planning application as well as those involved in the determination and enforcement of planning applications, for all relevant developments (residential, commercial and mixed developments).

## **Public Consultation**

The Draft Air Quality SPD was approved for public consultation by the Council's Cabinet Member on 6 August 2018. Public Consultation was held from Wednesday 8<sup>th</sup> August and Friday 21<sup>st</sup> September 2018. Notification of the Draft SPD consultation was sent via email and letter to:

- Statutory Consultees including adjoining Local Authorities; and
- Local Plan database contacts including individuals, developers and community groups.

Hard copies of the Draft SPD were made available in the customer contact centre and Council House in the city centre. The consultation was posted on the council's Facebook and Twitter account as well as appearing on the main council webpages.

A number of drop in sessions were also held across the City to facilitate community input and feedback.

Comments were requested via email to [ldf@coventry.gov.uk](mailto:ldf@coventry.gov.uk). An email address and contact telephone number was provided on all the consultation material and the website for those who wanted to ask questions and seek further information.

## Summary of Response to the Consultation

The Council received a total of 18 responses via email and post as well as a range of informal comments and suggestions made through stakeholder meetings and consultation drop in events. A summary of the representations made and the proposed action in response to the representations are set out in the table below.

**Table 1: Summary of Consultation Responses**

Summary of Representations	
Issue	Response
No monitoring has taken place south of the Memorial Park. Building 4000 houses on Kings Hill would have a dramatic effect on the air quality in Finham as currently no air monitoring figures are available.	Requirements for monitoring air quality as part of air quality assessments submitted in support of planning applications have been made clearer in section 5 and appendix 1.
No measurement or targets for sooty particles (PM2.5), and singularly fails to identify the CCC intentions on compliance on NO2. Actions to limit cars on the roads, not just buses, HGVs, LGVs and taxis.	Requirements for monitoring air quality as part of air quality assessments submitted in support of planning applications have been made clearer in section 5 and appendix 1 and includes small particulates. Compliance with NO2 limits is outside the scope of the SPD and will be covered in the air quality local plan.
There has been no air monitoring anywhere south of the Memorial Park; notably along the A45 nor lower Green Lane / Howes Lane bordering the A46, effects of house building in the Finham area need to be considered in terms of the impact on air quality.	Requirements for monitoring air quality as part of air quality assessments submitted in support of planning applications have been made clearer in section 5 and appendix 1.
The SPD fails in the much more limited task of setting up an effective air quality monitoring regime. Small soot particles are a serious threat to life and health but the City Council does not seem to have proposals to monitor them or targets for getting them down to World Health Organisation thresholds.	SPD can only cover development proposals not wider monitoring regime. Requirements for monitoring air quality as part of air quality assessments submitted in support of planning applications have been made clearer in section 5 and appendix 1 and includes small particulates.

<p>Clarification sought as to what type of charging unit and cabling is acceptable. Consideration to the practicalities of providing charging point in unallocated parking - who would be responsible for operating and maintaining the facility?</p>	<p>Noted.</p>
<p>There is an absence of any supporting epidemiological data to help clarify and understand the current Health Impacts and health trends that are affected by poor air quality. The document fails to adequately identify the scale of pollution monitoring required for NO2 Nitrogen Dioxide monitoring in the areas of Coventry that are currently worst affected. Neither does the plan attempt to model the impact that the Local Plan (which proposes 25,000 additional homes in the city) will have on traffic pollution and as a consequence, on air quality on particular major traffic routes within the city. The draft document also fails to recognise the importance of particulates in air pollution and their effects on the health of the population.</p>	<p>Requirements for modelling and monitoring air quality as part of air quality assessments submitted to support planning applications have been made clearer in section 5 and appendix 1 and includes particulates. Detailed health studies are outside the scope of the SPD document.</p>

Weak document which does little to ensure that we speedily will have clean safe air, and moreover, it fails to meet the requirements of the EU Air Quality Directive 2008/50/EC. The SPD fails to require that any planning permission must be consistent with an up to date Air Quality Plan, as per The NPPF. The Council's 2017 figures for NO2 levels inexplicably show a marked drop, bringing most of the city into compliance. – We believe that they have been artificially adjusted with DEFRA fiddle factors to erase the problem. No explicit guidance about what makes a proposed development “unacceptable” for air quality reasons – and which therefore allows or requires the council to refuse permission. Nowhere does the SPD give strong weight to the effects on human health of poor air quality. There is no requirement to monitor particulates, which the document acknowledges are “significant” cause of excess mortality in the city. There is no requirement to expand the monitoring network, even though the whole city is an AQMA and large areas planned for major development do not have any air quality monitoring. There is no recognition of significant cross boundary issues.

Requirements for modelling and monitoring air quality as part of air quality assessments submitted to support planning applications have been made clearer in section 5 and appendix 1 and includes particulates. Detailed health studies are outside the scope of the SPD document. Individual Local Planning Authorities in Warwickshire are preparing their own Air Quality SPDs which will be consistent with the approach taken by Coventry City Council.

SPD is not accurately measuring NOx and there is no proof of measuring the real killer PM2.5. Council negligent of producing a plan that does not properly address the means to improve air quality in Coventry viz., one that could lead to a serious reduction of the unnecessary respiratory illnesses and deaths.

Requirements for monitoring air quality as part of air quality assessments submitted in support of planning applications have been made clearer in section 5 and appendix 1. Compliance with NO2 limits is outside the scope of the SPD and will be covered in the air quality local plan.

Vehicles that comply with EU6 pollution regulations dramatically reduce the amount of Nitrogen oxides (NOx) and Carbon particulates and even the older EU4 regulation was a major improvement over the old polluting vehicles. These regulations came in at specific dates and a simple ANPR recognition system would allow you to stop non-compliant vehicles from entering the city and dramatically reducing pollution.

This is outside of the SPD and is currently being considered as part of the Air Quality Local Plan.

<p>The document makes statements e.g. 'Air Quality is a material concern', but does not give specific solutions, actions and time scales. This will result in Developers, local residents and Councillors interpreting the document in different ways. Currently the measuring of air quality using diffusion tubes in the City is very patchy and incomplete. There has been no air monitoring south of the Memorial Park in the last two years. As no current readings have been taken there can be no accurate forecast of what the impact on air quality will be in the future. The draft document also fails to recognise the importance of different pollutants and their effects on the health of the local population.</p>	<p>Comprehensive mitigation options are included in Section 5. Requirements for monitoring air quality as part of air quality assessments have been made clearer in section 5 and appendix 1. Adverse health impacts are clearly acknowledged by current planning policy detailed in sections 2-4 - scope of SPD is limited and we do not plan to expand on this.</p>
<p>Traffic pollution (both air and noise) is dreadful now any increase is totally unacceptable. These houses are for Warwick therefore the entrance and exit should be from Stoneleigh road. There needs to be some air and noise quality testing now before any further moves.</p>	<p>Requirements for monitoring air quality as part of air quality assessments have been made clearer in section 5 and appendix 1. Noise assessments would normally be required to support an application but not relevant to this air quality SPD.</p>
<p>Welcome engagement should a Clean Air Zone be proposed.</p>	<p>Noted.</p>
<p>New text in respect of Green Infrastructure proposed.</p>	<p>Agreed.</p>
<p>No focus on particulate matter - PM10/PM25. No requirement to increase scope of air quality measurements. Categories of pollutants are not listed.</p>	<p>Requirements for monitoring air quality as part of air quality assessments submitted in support of planning applications have been made clearer in section 5 and appendix 1 and includes particulates as do proposed mitigation measures.</p>

*Please note: some representations were received from the same address and made the same points.*