

Calderdale Local Plan

Air Quality Technical Paper

November 2018

1. Calderdale baseline air quality situation

1.1 Calderdale has designated seven AQMAs within its administrative area as a consequence of our Review and Assessment work. These have often been declared in areas where there is a combination of high traffic volumes and buildings located close to the roadside which can hinder the dispersion of exhaust fumes. It is also clear that there is a correlation between the junction capacity constraints on the network and areas of poor air quality. The council publishes reports on air quality, including progress with the Air Quality Action Plan (see section 5 of this paper). The air quality reports may be viewed at:

<https://calderdale.gov.uk/v2/businesses/pollution/air-quality/air-quality-reports>

1.2 The following AQMAs have been declared:

- AQMA 1: An area along the A629 between the former Stafford Arms and A340 Huddersfield Road, Salterhebble;
- AQMA 2: An area commencing adjacent to West Mills, West Street, Sowerby Bridge and extending along Town Hall Street and Wharf Street and ending in Upper Bolton Brow on Pye Nest Road and on Wakefield Road in Bolton Brow;
- AQMA 3: An area along the A646 in Hebden Bridge, commencing adjacent to Bankfoot Terrace and ending adjacent to Station Road;
- AQMA 4: An area following part of the Burnley Road through Luddenfoot;
- AQMA 5: An area encompassing parts of the Bradford and Leeds Roads and surrounding properties in Stump Cross, Halifax;
- AQMA 6: An area encompassing the main roads and surrounding buildings in the centre of Brighouse; and
- AQMA 7: Hipperholme Halifax Road/ Leeds Road crossroads

2. National Policy and Practice

2.1 The National Planning Policy Framework (NPPF) 2012 states:

124. Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.

2.2 The Revised NPPF 2018 states:

181. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as

possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

The Planning Practice Guidance (2014) (NPG) states:

Local Plans can affect air quality in a number of ways, including through what development is proposed and where, and the encouragement given to sustainable transport. Therefore in plan making, it is important to take into account air quality management areas and other areas where there could be specific requirements or limitations on new development because of air quality. Air quality is a consideration in Strategic Environmental Assessment and sustainability appraisal can be used to shape an appropriate strategy, including through establishing the 'baseline', appropriate objectives for the assessment of impact and proposed monitoring.

Drawing on the review of air quality carried out for the local air quality management regime, the Local Plan may need to consider:

- the potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments;*
- the impact of point sources of air pollution (pollution that originates from one place); and,*
- ways in which new development would be appropriate in locations where air quality is or likely to be a concern and not give rise to unacceptable risks from pollution. This could be through, for example, identifying measures for offsetting the impact on air quality arising from new development including supporting measures in an air quality action plan or low emissions strategy where applicable.*

3. Calderdale Local Plan Air Quality Constraints Assessment (AQCA)

- 3.1 This technical note was published in August 2016 and sets out the key air quality elements to be considered when assessing the possible options for development within the emerging Local Plan. The note can be viewed at the following link: <https://www.calderdale.gov.uk/v2/sites/default/files/Evidence-base-transport-TN7-air-quality-constraints.pdf>
- 3.2 Air quality constraints risk mapping was produced for the borough based on AQMA and junction capacity constraint data (see figures 2-9 of the AQCA). The aim of this mapping was to aid site selection for future development. The areas were ranked as high, moderate and low in terms of air quality constraints to development. Areas that have been ranked as high in terms of air quality constraints are the seven declared AQMAs across the borough. Moderately constrained areas have been determined as those areas either within 200m of a declared AQMA or 200m of those junctions that have been determined by the Transport Consultants as having

capacity constraints. The 200m criteria has been based on the Design manual for Roads and Bridges (Volume 3, Section 3, Part 1, HA207/07, Air Quality) approach which uses 200m from affected roads as a criteria for likely affects. Beyond this distance air quality concentrations are assumed to rapidly reduce. Therefore this 200m criterion is being used as a worst case approach. Low risk areas are then assumed to be those regions not ranked as high or medium risk.

- 3.3 The AQCA concludes that on the basis of the information available, it is highly unlikely that any areas that are not currently highlighted as a risk would become an air quality risk in the future. This is because, in line with current thought regarding Euro 6 (VI) vehicles, concentrations are expected to fall.
- 3.4 The AQCA also identifies that on initial review of the high level air quality constraints risk mapping it would appear that sites to the western side of Calderdale would be favourable in terms of least air quality constraints. However, from understanding the junction capacity constraints on the network and conclusions within the Transport Evidence, it is apparent that the eastern side of Calderdale has preferential status for development. As larger towns are already located in the east, this area can be considered a more sustainable location for future development. This is because there is a greater opportunity for improved sustainable transport and highway constraints appear to be more readily improved in the east of Calderdale. Such measures work positively with air quality thus limiting constraints in this region.
- 3.5 The overall spatial distribution of development has been strongly influenced by the proposition above that eastern Calderdale is the preferred area for development. Furthermore it should be noted that the two Garden Suburb sites have been located in areas that are identified as having low air quality constraints. Figure 1 shows an overlay of the air quality constraints mapping and the draft Local Plan allocations.

4. Draft Local Plan Policy and response to representations made during publication

- 4.1 Numerous Local Plan policies have an impact on air quality; however, the issue is addressed specifically in the Environmental Protection chapter. The key policy is EN2 – Air Quality:

All proposals that have the potential to increase local air pollution either individually or cumulatively must be accompanied by proportionate evidence to show that the impact of the development has been assessed. Assessments must be in accordance with the guidance contained in the West Yorkshire Low Emissions Strategy and Air Quality & Emissions Technical Planning Guidance (or equivalent guidance) where this guidance is relevant to the proposal. In cases where industrial emissions may be introduced or increased an appropriate assessment must be submitted. Proposals that are not accompanied by that evidence or which do not incorporate adequate mitigation measures as indicated by the guidance will not be permitted.

Where the development introduces new receptors into Air Quality Management Areas the development must incorporate sustainable measures that protect the new receptors from unacceptable levels of air pollution. Where sustainable measures cannot be introduced which prevent receptors from being exposed to unacceptable levels of air pollution, development will not be permitted

4.2 On publication of the Local Plan representations were made that presented the following issues:

- A perceived lack of assessment or evidence in relation to air quality in particular the Council's evidence should have modelled the impact of development on air pollution
- Concern that the Local Plan does not place sufficient emphasis on air quality
- Concern that road improvements could contribute to air pollution
- Policy EN2 is not considered to be sound because it does not require air quality to become compliant with lawful standards by due dates or require that development that would prevent compliance is refused
- If it were to be the case that meeting the Objectively Assessed Need resulted in continuing unlawful levels of air pollution, then that would constitute an 'adverse impact [the meeting of which] would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'

4.3 The Council's response to these issues is set out below:

- The NPPF establishes that *planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants*. The Planning Practice Guidance establishes that *Local Plans can affect air quality in a number of ways, including through what development is proposed and where, and the encouragement given to sustainable transport. Therefore in plan making, it is important to take into account air quality management areas and other areas where there could be specific requirements or limitations on new development because of air quality*. This narrative indicates that it is a purpose of the Local Plan to take air quality into account, considering the type and location of development. The role of the Local Plan is clearly a contributory one, as opposed to being the lead mechanism. Local planning policy is not by itself capable of requiring air quality to become compliant with legal standards, and national policy clearly does not expect it to do so.

- In relation to plan making, the NPPF goes on to establish that significant adverse impacts on any of these dimensions [i.e. of sustainability] should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate. The Council's approach to allocations and policy making essentially follows this sequence – allocations are concentrated in the most sustainable locations where air quality constraints are lowest; policy then sets out a requirement for measures to mitigate the residual impact.
- The Local Plan is part of a wider governance framework for the delivery of legally compliant air quality – see Appendix 2 for a diagrammatic representation. In relation to this it should be noted that the [Low Emissions Strategy and Air Quality Action Plan](#) are at advanced stages of preparation. It should also be noted that the Council has adopted the [West Yorkshire Low Emissions Strategy](#) and [Transport Strategy](#). When viewed in the round it can be seen that the Council has taken a robust and comprehensive approach to improving air quality.
- In accordance with paragraph 152 of the NPPF (2012) local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. In this context the Local Plan should seek to strike a balance between aspects of sustainability rather than promoting the interests of air quality over and above all other considerations.
- The NPPF establishes that Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. This implies that a very high bar needs to be surpassed before concluding that objectively assessed needs should not be met; furthermore it does by necessity require that a such a decision must be based on a balancing exercise that also considers the benefits of development. In this context, given the benefits of development and the Council's well developed overall approach to improving air quality, the significantly and demonstrably tests are not met.

5. Calderdale Air Quality Action Plan 2018

- 5.1 During 2017 the Council re-drafted and revised its 2009 Air Quality Action Plan. The aim of the Plan is to set out actions to improve air quality across the Borough with a specific focus on the Air Quality Management Areas. There is a statutory requirement for Local Authorities to consult about their Air Quality Action Plan and a formal consultation took place in the early summer of 2018. The draft of the current

Air Quality Action Plan was publicised on the Council's website, by social media and by email, and placed in main libraries. The consultees included:

- Neighbouring local authorities
- DeFRA
- The Highways Agency
- The Environment Agency
- Public Health England
- The public

5.2 [The consultation began on 1st March 2018 and ran until the end of June.](#) Responses were received from DeFRA, Highways England and Calderdale Friends of the Earth as well as a small number of individuals. The responses were reviewed and amendments made to the Air Quality Action Plan where it was considered appropriate. The summarised consultation responses, together with commentary, are included in Appendix E to the Air Quality Action Plan.

5.3 There are 4 key priorities within the Action Plan:

Priority 1 - promoting alternatives to private vehicle use, recognising the contribution of diesel vehicles and bidding for ULEV funding whenever possible

Priority 2 – improving the transport network infrastructure, as set out in the Council's Transport Strategy and Local Plan

Priority 3 –developing awareness of impacts and remedies, and integrating the priorities of other strategies and frameworks, such as public health (active travel), sustainability (carbon reduction strategy) and local planning (sustainable development)

Priority 4 - encouraging public engagement and interest through improved communication and community involvement.

5.4 The Action Plan includes the following specific actions to deliver on priorities:

- i) To increase focus and support in lobbying, influencing and engaging key internal and external partners to support improvements in public transport and achieve lower emissions e.g. WYCA; Defra; Highways England; First Bus; Planning; Transport Services.
 - Retrofitting of buses is a key action which would help to reduce emissions. First Bus has confirmed that 39 First Buses will be retrofitted in Calderdale during 2019. This fleet size is

95 in Halifax with 14 already Euro VI or equivalent. WYCA/Bus 21 will progress further improvements in this area.

- Lobbying to ensure improvements identified for rail links to Huddersfield and Huddersfield station are progressed
- ii) Mitigating effects of air pollution. Schools on main roads to trial 'green screens' to help mitigate effects of air pollution - funding will be required to support this and grants will be investigated. First school identified for this action would be Burnley Road Academy and we are discussing feasibility and costings.
- iii) Monitoring:
- Continue to monitor the air quality management areas for NO2. Identify areas for monitoring PM2.5. Funding for this will need to be identified.
 - Purchase hand held devices for communities and organisations to use to highlight nature of air quality
- iv) To increase public and stakeholder awareness of air quality issues building on national activity and developing communications material which focuses on regular key messages to residents, businesses and schools using social media, print media, PR and engagement. This includes;
- Building on the ECO stars scheme with freight owners which WYCA have initiated to encourage cleaner vehicles and improved driving.
 - Developing schools/community material which can be downloaded from the website
 - Improving the information on the website with potential of including real time air pollution information
 - Develop messages for social media encouraging business and commuters to make transportation choices which help improve air quality in the area – #cleanaircalderdale
 - Printed material for use at events
 - Communications to support national clean air day 20 June 2019
 - Reporting of live air quality data on the Calderdale website to be progressed

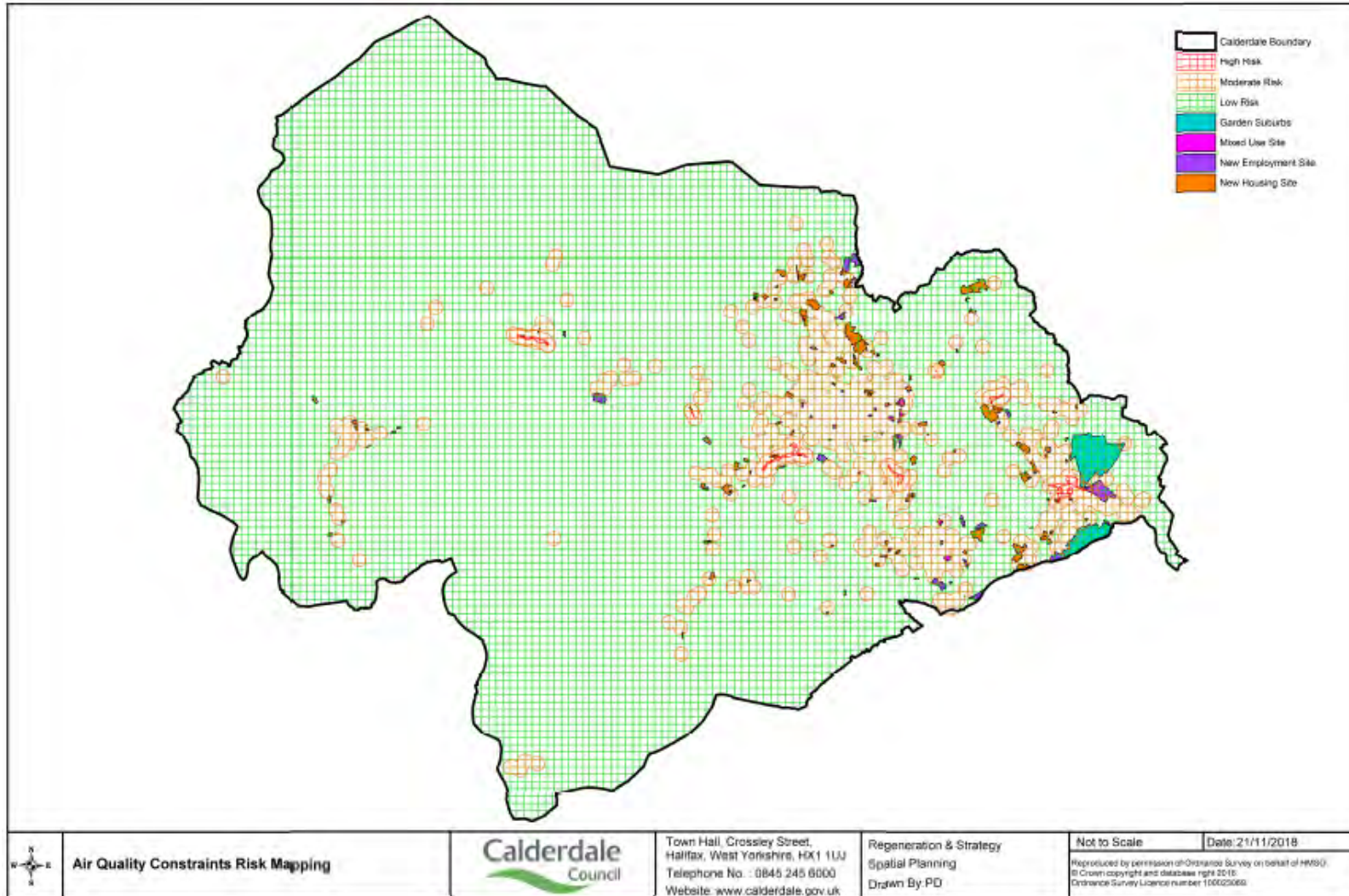
- v) To progress a targeted action plan in one area with potential to develop in other areas. Sowerby Bridge proposed as the trial area to build on and inform the Corridor Improvement Plan and Masterplan:
- creating public realm improvements to encourage modal shift;
 - identifies areas for electric charging points;
 - promotes walking and cycling routes by improved signage;
 - encouraging schools to promote walking and cycling.
 - Identifying business to target to join ECO stars scheme to encourage cleaner vehicles

5.5 A [Low Emissions Strategy](#) has also been developed to sit alongside the AQAP. This has also been open for consultation. This document identifies the specific issues related to emissions and establishes a framework for Highways and Transportation to work within. The Low Emissions Strategy will also be submitted to cabinet for approval.

6. Conclusions

6.1 There is no magic bullet/single key intervention to improve air quality in our area. The Council recognises a number of interventions need to be enacted at local level with a sea change needed in our attitudes towards travel and a shift in behaviours so that we reduce car dependency especially the most polluting. These changes will have far more impact if there is a national framework and action to improve air quality especially the removal of the most heavily polluting vehicles on our roads. The Local Plan makes an important contribution to the issue of air quality through the consideration it has given to the location of development and policies contained therein.

Appendix 1 – Air Quality Constraints Mapping



Appendix 2 – Calderdale Governance of Air Quality

