



New Forest District Council
Supplementary Planning Document –
Air Quality in new development.

This public consultation is available through the New Forest District Council website link [Air Quality in New Development - New Forest District Council](#). The deadline for comments is Friday 1st April 2022. Please see the following summary for discussion -

1. Introduction

This guidance supports Local Plan Objective SO2 Biodiversity and Environmental Quality, and Policy CCC1 Safe and Healthy Communities in its aim to prevent hazards and pollution. It states where an assessment will be needed and what mitigation might be required to enable development. It will advise what type of assessment is required to show local air quality impact to human health and ecological receptors. It is recognised that poor air quality impacts quality of life, human health plus ecosystems and the local micro-climate. When determining an application social, environmental and economic factors need to be considered. Air quality is a material factor in determination.

2. National Air Quality Context

Everyone's health is impacted by air pollution and is particularly problematic for the young, elderly and people with chronic health conditions. Human health impacts are well known and long-term exposure to man-made pollution has been attributed to 36,000 deaths annually.

3. Air Quality in New Forest District

Generally, this is of good quality and recorded in statistics produced by NFDC and Public Health England. NFDC have a duty to keep this under review due to government guidance from the Local Air Quality Management regime, with details added to the Annual Status report. Main issues for the district area are

- Increased vehicle movement on local road network (nitrogen oxide NO₂ and particulate matter PM)
- Industrial developments (NO₂, PM and sulphur dioxide SO₂)
- Mineral extraction sites (NO₂ and PM)
- Construction sites (PM)

Parameters for air quality are set by government and noted over set assessment periods. If there is a breach or likelihood of one NFDC must declare an Air Quality Management Area (AQMA) and provide an action plan to deal with it. Currently there is one in Lyndhurst due to NO₂ from vehicles (outside of NFDC planning remit).

4. National Policy and Practice

Air Quality is a material consideration as shown in National Planning Policy Framework text on para 170 & 181, and impact of traffic on air quality through paras. 102d and 105 within the need for sustainable travel modes.

5. Planning Policy Guidance

Location and the development itself will be the key factors in deciding if air quality is a relevant consideration. There could be concern if the development could impact an already impacted area or if the development could be sensitive to an existing poor air quality area. Applicants will be encouraged to engage early with officers (Planning and Environmental Health) to adequately scope an application. National guidance states that impacts include changes to vehicle emissions; new point sources of pollution; human exposure to harmful concentrations of pollutants; potential impact to biodiversity. Any mitigation needs to be site specific, tailored to the site and proportionate to the likely impact.

6. Local Plan Policy Background

These aims are supportive of SO2 and CCC1 as mentioned in para 1. Mitigation may be required to prevent, control, mitigate or offset impact on community safety and health.

7. Development Management

Assessment of air quality will follow three stages

- a) Does the proposal fall within an identified threshold?
- b) If so, it should be assessed and impact quantified on local air quality, and
- c) If mitigation measures are applied, is the proposal acceptable?

Pre-application discussions would ensure applications are complete when received. They will be required to show enough detail to enable assessment. Consideration will be given to

- Significance of impact on local air quality
- Current air quality for the area
- Likely use of the development (i.e. how long people are likely to be exposed for at that location)

It is expected that most forms of development will have an air quality and human health impact, therefore mitigation must be implemented by the applicant. Impacts will be determined as either significant or not significant.

8. Assessment of Air Quality

Staged approach – a flow chart has been incorporated into the document which has been developed from relevant guidance and methodologies. The stages are shown below

Development design (Section 1) – noted that qualities and sensitivities of New Forest landscapes and habitats demand care and attention in quality of new development. Policy ENV3 sets that high quality living for current and future residents is expected, therefore developers are expected to find sustainable places. Design stage should consider air quality as well as other parameters, by -
 minimising vehicle numbers on site, removing street canyons, minimising exposure to pollutants by siting outside space away from busy roads, installation of electric charging points, energy efficient properties, easy connections to public transport, walking and cycling networks, green infrastructure, landscaping and planting.

Requirement for an Air Quality Statement or Assessment (Section 2) – NFDC use a document from the Institute of Air Quality Management dated 2017 in determining if an assessment is needed in the application. It gives detail in how to predict impact of development. Where an assessment is not needed, a statement must be provided. This will include commitment to instigating a reduction in emissions from the proposed development. A table accompanies this and can be seen as the last page of this report.

Air Quality Statement (Section 3) – Any statement should include why it is being used rather than an assessment, quoting from relevant guidance, and should confirm 3 mitigation measures for implementation selected from Appendix 1 list (14 issues installing electric car charge points at each property, green infrastructure elements, fleet emission reduction strategy, hire of bikes).

Prior to submission of Air Quality Assessment (Section 4) – Developers are strongly recommended to contact NFDC prior to application submission, on the requirements to undertake an assessment, the models required, extent, cumulative impact and agreement of traffic figures from the Highway Authority.

Air Quality Assessment (Section 5) – This should be a detailed document which charts potential impact, following current air quality and planning guidance, utilise existing methodologies agreed in advance with NFDC, assessing the significance of impact, displaying professional judgement and commit applicants to implementing proportionate mitigation to minimise emissions. It should also identify receptor points and baseline conditions, using mathematical verification of the model from guidance, results of which should be detailed in the document. It must provide a robust determination of likely impact significance. The methodology used should meet the DEFRA Technical Guidance note LAQM TG(16) or any guidance that supersedes it.

Dust Impact Assessment (Section 6) – The statement or assessment must also detail the impact of operational phase, plus construction phase on relevant receptors. A Dust Impact assessment will be required where there is a human receptor within 350m of the site boundary or 50m of the route used by construction vehicles on the public highway, up to 500m from the site entrance. This detail should follow current guidance ‘Assessment of Dust from demolition and construction’ from the Institute of Air Quality Management dated Feb 2014. The Construction phase is significant for human health and dust soiling (regards nuisance) specific to demolition, earthworks, construction and track out. Mitigation is a possibility, and a dust management plan if required would be set under a potential Construction Environmental Management Plan condition.

9. Air Quality and the Natural Environment

Significant adverse effects from nitrogen deposits and ammonia have been modelled from cumulative traffic growth affecting parts of the New Forest Special Protection Area and Special Area of Conservation. Currently there is no evidence to suggest traffic related air pollution negatively affects these areas. There is uncertainty due to traffic growth and resultant pollution might affect them in the future. NFDC plan to take a precautionary approach by requesting a ‘modest’ financial contribution for monitoring to continue at sensitive locations to inform on certain triggers. A monitoring regime has already been instigated. If monitoring finds that significant effects are likely or already happening, legal agreements will be instigated so that applicants make reasonable contributions for air quality management or mitigation. The current project monitors wet and dry heaths and woodland at selected locations including the air quality. A monitoring framework and baseline has been established.

SUGGESTED RESPONSE

Under Chapter 8, para 8.3 we are concerned that ‘minimising numbers of vehicles on site’ will further pressurise site parking onto our residential streets, in an attempt to mitigate.

Several mitigation measures within Appendix 1 target issues that have already been identified within other policies such as the requirement for biodiversity net gain, installation of electric car charge points etc and therefore are a matter of repetition.

Section 6 - The need for a Dust Impact Assessment if criteria is met is a notable positive move. Many residents find the construction phase very distressing with dust impact a prime reason for concern.

Table 1 - Air Quality Statement or Assessment

STEP 1	Air Quality Statement	Air Quality Assessment
Development type		
Residential		
Less than 10 residential units or site less than 0.5ha	✓	✓
More than 10 residential units or more than 0.5ha, plus: <ul style="list-style-type: none"> • More than 10 parking spaces or • Centralised energy facility or combustion process 		✓
Other use classes		
Less than 1,000m ² of floor space or site less than 1ha	✓	✓
More than 1,000m ² of floor space or site more than 1ha, plus: <ul style="list-style-type: none"> • More than 10 parking spaces or • Centralised energy facility or combustion process 		✓
STEP 2		
Specific Criteria		
Traffic numbers		
Developments which generate less than 500 annual average daily traffic flows (AADT) for light goods vehicles (including cars) for outside AQMA or less than 100 AADT in or adjacent to* an AQMA – these figures will be produced from a transport assessment and agreed by the highway authority	✓	✓
Developments which generate more than 500 annual average daily traffic flows (AADT) for light goods vehicles (including cars) for outside AQMA or 100 AADT in or adjacent to* an AQMA – these figures will be produced from a transport assessment and agreed by the highway authority		✓
Developments which generate less than 100 AADT for heavy duty vehicles for outside AQMA or less than 25 AADT in or adjacent to* an AQMA – these figures will be produced from a transport assessment and agreed by the highway authority	✓	✓
Developments which generate more than 100 AADT for heavy duty vehicles for outside AQMA or 25 AADT in or adjacent to* an AQMA – these figures will be produced from a transport assessment and agreed by the highway authority		✓
Other		
Developments with 25m of A35 (Totton – Redbridge Causeway)		✓
New bus stations		✓
New road junction close to relevant receptors such as housing or schools		✓
Developments within an AQMA		✓
New substantial combustion plant including biomass boilers and standby emergency generators		✓