



ENVIRONMENTAL PROTECTION

Highways & Transport

Economy, Environment and Communities Directorate

Interim Position Statement Concerning Air Quality and Proposed Planning Developments

Overview

Following publication in 2021 of revised and updated World Health Organisation (WHO) Air Quality Guidelines (AQG), it has been appropriate for Environmental Protection (EP) to review its position in regard to planning development and air quality impacts within the borough.

The WHO guidelines are a critical tool for a range of users, including, but not limited to:

- i) technical experts operating at local, national and international levels responsible for developing and implementing regulations and standards for air quality, air pollution control, urban planning and other policy areas;
- ii) local authorities;
- iii) health and environmental impact assessment practitioners.

Basis to WHO global air quality guidelines

The 2021 AQG are framed having reference to a range of key considerations:

- Exposure to air pollution across the world is estimated to cause millions of deaths and lost years of healthy life annually
- Reducing the burden of disease (and corresponding significant economic burden) attributable to air pollution, which is now estimated to be on a par with other major global health risks such as unhealthy diet and tobacco smoking



- Recognition that air pollution is the single biggest environmental threat to human health
- Barely any decline has occurred since the 1990s in the global toll in deaths and lost years of healthy life due to air pollution
- Increased morbidity and mortality from cardiovascular and respiratory disease and from lung cancer caused by air pollution
- Increasing evidence of the effects of air pollution on other organ systems
- An overall objective to offer quantitative health-based recommendations for air quality management
- A goal to provide guidance to help reduce levels of air pollutants in order to decrease the enormous health burden resulting from exposure to air pollution
- An aim to protect populations from the adverse effects of air pollution

Environmental Protection recognises that the guidelines at present do not currently constitute binding standards at national level. They are designed to serve as a reference to assess pollutant concentration levels to determine population exposures which may result in health concerns.

The scope of the guidelines cater for particularly vulnerable and/or susceptible subgroups, and are applicable to both outdoor and indoor environments. Thus, they cover all settings where people spend time.

Air Quality and Planning Development

Up until publication of the 2021 AQG, Environmental Protection has generally appraised suitability of development proposals in line with National Air Quality Objectives (which have mirrored EU Air Quality Limit Values), underpinned by government commissioned studies and reports by Expert Panels and bodies *inter alia*. This approach was predicated on health protection for the most susceptible sectors of society.

When assessing proposed planning developments, the impact on air quality is a material consideration. National Planning Policy duly sets out various over-arching



matters that local planning authorities are obliged to take into account in policy and decision making. These encompass:

- An environmental objective - to protect and enhance our natural, built and historic environment, including minimising pollution
- That preparation and review of all policies should be underpinned by relevant and up-to-date evidence
- Whether a particular development will be acceptable in principle
- A requirement that planning policies and decisions should aim to achieve healthy, inclusive and safe places
- Taking account of, and supporting, the delivery of local strategies to improve health, ensuring potential impacts of development on transport networks can be addressed
- Promoting an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment, and ensuring safe and healthy living conditions.
- Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution
- Ensuring that new development is appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health.
- To sustain and contribute towards compliance with relevant limit values or national objectives for pollutants
- Identifying opportunities to improve air quality or mitigate impacts
- Whether proposed development is an acceptable use of land

WHO Air Quality Guidelines and Planning Development

The 2021 AQG comprise relevant scientific and medical up-to-date evidence on the impacts of environmental pollutants on air quality. This has brought about a marked reduction in the threshold levels of key pollutants that are designed to avoid harm to health. As a result of this, for certain air pollutants the Walsall borough as a whole is adversely affected, in that a stated AQG (or Interim Target) concentration is exceeded.



This presents a serious dilemma in terms of technical, policy, public protection and moral considerations when planning development proposals seek to introduce new, sensitive (relevant) receptors to areas of 'poor air quality', or development that either adds additional air quality burdens or does not promote improvements in air quality. This places other planning needs in direct conflict with the ethos of environmental and public protection themes.

Interim air quality targets

Achievement of an AQG is the ultimate goal, albeit implementation is undoubtedly a very difficult task. Therefore, gradual progress in improving air quality, marked by the achievement of Interim Targets, is an important indicator of improving health conditions for populations and to guide efforts to reduce air pollution.

Interim Targets have therefore been adopted for air pollutants that are set at concentrations above AQG levels, though which can be used to develop pollution reduction policies that are achievable within realistic time frames. This constitutes steps towards the ultimate achievement of AQG levels at a future point in time, rather than as end targets.

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Environmental Protection already requires new development to fulfil the intentions of national planning policy which, among other things, provides provide for:

- Safeguarding and improving health
- Providing healthy places
- Appropriateness for its location, accounting for the likely effects of pollution on health.
- Mitigating or improving air quality impacts

Until further government guidance, policy or mandate is forthcoming, in seeking to reconcile these considerations, Environmental Protection cannot support new planning development where national air quality objectives are exceeded, and in principle, will not support developments where the following Interim Air Quality Targets



are not achieved, or cannot be achieved within a reasonably foreseeable time frame once development is brought into use, unless new development brings about a reduction in pollutant concentrations:

- Particulate Matter, PM_{2.5} annual mean concentration 10 µgm⁻³
- Particulate Matter, PM₁₀ annual mean concentration 30 µgm⁻³
- Nitrogen Dioxide, NO₂ annual mean concentration 30 µgm⁻³

Based on the above, in responding to planning application consultations it is likely that Environmental Protection will advise that all major planning applications, along with applications for new residential development, and those applications that may negatively impact upon air pollutant concentration levels, may be required to be appraised at the outset by Air Quality Assessments. This should be fundamental to informing the decision making process and may take the form of either a screening appraisal or a more comprehensive impact study.

Air Quality Assessments should seek to confirm that the pollutant concentrations set out above will be met by new development where relevant receptors[#] are exposed to these pollutants, or otherwise mitigation will be applied to secure compliance, and that no additional air quality burden compromises compliance.

Where possible Environmental Protection will make information available to assist in determining representative pollutant concentration levels based on ambient air quality monitoring and air quality modelling.

[#] Relevant Receptor: A location representative of human (or ecological) exposure to a pollutant, over a time period relevant to the objective, limit or target that is being assessed against, and where National Air Quality Strategy objectives are considered to apply. For annual mean concentrations of pollutants this applies to: all locations where members of the public might be regularly exposed; building façades of residential properties; schools; hospitals; care homes etc. This should generally exclude building façades of offices or other places of work where members of the public do not have regular access; hotels, unless people live there as their permanent residence; gardens of residential properties; kerbside sites (as opposed to locations at the building façade);



or any other location where public exposure is expected to be short term.

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