

Consultation Statement

Black Country Air Quality Supplementary Planning Document (SPD)

In connection with the adoption of the Black Country Air Quality Supplementary Planning Document (SPD) 2016, a Consultation Statement is required to demonstrate with whom Walsall council consulted and how we engaged with local people and other interested parties during the preparation stages of the SPD.

The statement contains the following information:

- i) a summary of the organisations with whom the Councils consulted;
- ii) how those organisations were consulted;
- iii) a summary of the issues raised; and
- iv) how those issues have been addressed in the SPD.

An eight week consultation on the Draft Black Country Air Quality SPD was undertaken by Walsall Council between **Monday 29th February to Monday 25th April 2016**.

The following consultees were sent either a letter or email providing a link to the Council's website to view the SPD. Comments were invited on the draft SPD:

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| Statutory organisations and Prescribed bodies under Duty to Cooperate | 14 |
| Organisations/developers on Consultee database by email | Approx. 850 |
| Ward Councillors | 60 |

This consultation was in addition to the consultation undertaken by the other Black Country authorities (Dudley, Sandwell and Wolverhampton) which included **40** statutory organisations and prescribed bodies under Duty to Cooperate along with **1000** organisations/developers.

The Draft SPD was published on the Council's websites. In addition, paper copies of the draft revised SPD were distributed to all main libraries in Walsall and at First Stop Shop in the Civic Centre.

A press release was produced informing the general public about the consultation process and encouraging people to get involved. This was published on the front page of the Council's website.

As detailed in paragraphs 178-181 of the National Planning Policy Framework, public bodies have a Duty to Co-operate on strategic planning issues that cross administrative boundaries. The prescribed bodies under Duty to Cooperate were therefore consulted in relation to the Draft SPD.

In addition to the external consultation process, the Draft SPD was also circulated to relevant internal Council staff inviting comments relating to their particular areas of expertise.

A total of **17** representations were made on the draft SPD.

| Organisation | | Summary of Response | Council Response | Proposed Amendments to SPD |
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| 1 | Canal & River Trust (Ailith Rutt) | <p>The Respondent notes that as it owns and manages a substantial network of canals within the area, it is keen to ensure that the impacts of development on the canal and their users including boaters and towpath users are fully considered and mitigated properly.</p> <p>As such the Respondent welcomes the SPD as it will provide a consistent approach to planning applications and assist in assessing the impact of developments on our waterways.</p> | Support Noted. | No change required |
| | Canal & River Trust (Ailith Rutt) | <p>Whilst the Respondent is generally supportive of the approach taken to classification and mitigation, it is highlighted that there is no clarification as to what 'sensitive development' within para. 4.8. would include.</p> <p>The Respondent considers that the canal network should be identified as a potentially 'sensitive development' to ensure that development acknowledge the canals as a sensitive receptor and include appropriate mitigation measures.</p> | Agree, amend paragraph 4.8 to clarify what is meant by sensitive development. | <p>Amend paragraph 4.8 to read:</p> <p>"When it is proposed to locate new industry or a significant combustion installation near to existing residential development or other relevant receptor where an air quality objective applies having regard to Defra Technical Guidance, an account of the potential effects of emissions from chimneys/vents must be taken. For this purpose detailed modelling of emissions and consideration of vehicle movements and associated emissions must be made. Damage costs should be calculated and mitigation measures</p> |

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| | | | | <p>commensurate with the emissions calculated shall be agreed or required by condition. Where mitigation measures are not feasible or offsetting the impact is not possible, a recommendation for refusal may be made.</p> <p>For clarity, air quality objectives should apply at all locations where members of the public might be regularly exposed; building façades of residential properties, schools, hospitals, care homes etc.; and in some specific cases hotels, gardens of residential premises, kerbside sites (such as pavements of busy shopping areas), railway and bus stations, and enclosed car parks to which the public have access, and any outdoor locations where members of the public might reasonably expected to spend one hour or longer.”</p> |
| | <p>Canal & River Trust (Ailith Rutt)</p> | <p>The Respondent considers that the benefits of utilising existing Green Infrastructure, such as the canal network, as transport links should clearly be set out within the SPD.</p> <p>For example para. 4.11 sets out mitigation measures; these could include using the canal network which has the potential to provide a sustainable pedestrian / cycle network.</p> | <p>Agree to make specific reference to the use of the canal network in the mitigation measures. Rather than under paragraph 4.11 is is considered more appropriate to include this under the list of mitigation measures under</p> | <p>Amend the 5th bullet point under paragraph 5.7 to read <i>‘Improved convenient and segregated cycle paths to link the cycle network, including canal towpaths.’</i></p> |

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| | | | paragraph 5.7. | |
| | Canal & River Trust (Ailith Rutt) | The Respondent considers that future developments should be encouraged to explore the potential of utilising the existing green network at an early stage in the development process and this could perhaps be encouraged more explicitly in the SPD, especially in Section 5. | Agree that reference should be made within the SPD to the benefit that trees and landscaping can provide as a mitigation measure for air quality. | Add a new bullet point under 'All Development' in paragraph 5.7 stating: <i>'The provision of trees and landscaping features where appropriate.'</i> |
| | Canal & River Trust (Ailith Rutt) | The Respondent suggests that there are opportunities within the SPD to identify further mitigation measures such as urban hedges, planting trees and making more reference to the benefits that green infrastructure and the canal network in particular can play in achieving the overall mitigation and aims of the SPD. | Agree that reference should be made within the SPD to the benefit that trees and landscaping can provide as a mitigation measure for air quality. | Add a new bullet point under 'All Development' in paragraph 5.7 stating: <i>'The provision of trees and landscaping features where appropriate.'</i> |
| | Canal & River Trust (Ailith Rutt) | The Respondent would seek to support monitoring during and post construction to ensure the success of the objectives set out. | Agree, add new section A1.7 at the end of Appendix 1 (air Quality Assessment Protocol) | Add new section A1.7 in Appendix 1 to read: <i>"Construction phase impacts often primarily relate to dust emissions and elevated levels of particulate matter in air expressed as PM_{2.5} and PM₁₀. In some cases construction plant and machinery may have a tangible impact, and a balanced view is necessary as to whether an air quality impact assessment which includes pre and post construction monitoring is necessary. This will need to incorporate the likelihood of both long term and short-term air quality objectives being exceeded, and should be</i> |

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| | | | | <i>approached on a site specific basis having regard to the location of relative receptors.”</i> |
| 2 | Environment Agency Martin Ross – Planning Specialist) | <p>In relation to larger installations that may cause air pollution, the Environment Agency permit these sites under the Planning and Pollution Control Regulations. Across the Black Country, the Respondent permits 60 or 70 installations, although not all are with the purpose of monitoring and controlling air quality.</p> <p>The Respondents notes in Para. 4.8 the proposed controls to be put in place for the provision of new industrial uses that may cause pollution to existing housing, the development of new housing next to existing installations can at times be missed or not considered, as appears to be the case here.</p> <p>With the high concentration of PPC permitted sites within the Black Country, coupled with the high numbers of dwellings proposed across the Local Plan period, it is inevitable that this conflict of proximity between the two may arise from time to time. The Respondent would recommend therefore, that where new housing is proposed near to these installations there should also be an assessment of the likely effects to the residents of the potential new housing development, or at the least, the Environment Agency were consulted for their opinion.</p> <p>The text in point 4.8 suggests such assessment should take place when proposals are ‘near’ to residential or other sensitive development. The Respondent suggests that clarification in terms of what near means would be beneficial, either for industrial uses near houses or the other way round.</p> <p>The Respondent notes that the Environment Agency used to be consulted where new installations were likely</p> | <p>It is considered that this issue is already captured through the existing planning policy framework and does not require additional detail within this SPD.</p> <p>However agree that for clarity it would be helpful to set out within the SPD that appropriate consultations will be undertaken with relevant stakeholders in line with national and local planning guidance.</p> | <p>Add a new sentence at the start of paragraph 4.8 as follows:</p> <p><i>‘For residential developments close to industry, or the development of industry in close proximity to existing housing, appropriate planning consultations will be undertaken with relevant stakeholders in line with national and local planning guidance.’</i></p> |

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| | | to be nearer than 250m to dwellings to give an approximation of what distance may be used. This is a fairly conservative distance, so it is suggested that it was further than that. | | |
| 3 | Grainrent Ltd (Katherine Lovsey-Barton, Pegasus Group) | <p>The 4 Step Approach to Assessing Planning Proposals Step 4(Determining Suitable Mitigation Measures) (Pages 12 and 13)</p> <p>The Respondent considers that the draft SPD does not provide any evidence as to why it is necessary for all developments to provide some form of mitigation. In particular the phrase ‘render it (the development) sustainable in air quality terms’ is used (i) without any indication as to what is meant by sustainable in this context and (ii) this implies that all development is unsustainable in air quality terms regardless of what is being proposed.</p> <p>The NPPF is very clear in that there are three strands to sustainable development – economic, environmental and social – and that all three should not be undertaken in isolation. Air quality is therefore one aspects of sustainable development and consequently it is difficult to understand how such a definitive view can be taken because it is doing exactly what the NPPF says should not happen and is looking at air quality in isolation without the knowledge of any other matters.</p> | Agree that clarification is required within the SPD. | <p>Amend paragraph 4.13 to read:</p> <p><i>“Concerns arise if development is likely to generate air quality impacts in an area where air quality is known to be poor and also where the development is likely to adversely impact upon the implementation of air quality strategies and action plans. The introduction of new pollutant sources or mechanisms for producing additional air pollution is a relevant planning concern. To reduce the cumulative impact(s) of development and render it sustainable in terms of air quality, mitigation measures are required for all developments within scope irrespective of whether they are sited in an area which exceeds the air quality objectives. This sustains compliance with national air quality objectives which is a material planning consideration and is aimed at future-proofing the environment. The type of assessment, mitigation and/or compensation required for each of the development classifications (which is locationally specific) is summarised below.”</i></p> |
| 3 | Grainrent Ltd (Katherine | The Respondent notes the requirement for all residential developments to provide electric vehicle charging points. | Agree that to ensure consistency with the Dudley | Add the following 2 sentences to the bottom of |

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| | Lovsey-Barton, Pegasus Group) | <p>It is noted however that this would conflict with Dudley's adopted Parking Standards SPD (2012) because this says that for flatted developments and apartments, where parking may be some distance from the dwellings, the possibility for financial contributions may alternatively be considered in exceptional circumstances. The justification for this is that it may not always be feasible or appropriate to include the charging point requirement within flatted developments / apartments.</p> <p>The Respondent considers that if a consistent approach is not taken and the same stance is not reflected in this emerging SPD then there will be a conflicting position in Dudley because both SPDs will be relevant. If this conflict is not removed then neither SPD can be relied upon because the other one provides different guidance on the same issue. As the Parking Standards SPD is already adopted it is the emerging Air Quality SPD that should be amended.</p> | Parking Standards SPD reference is required to be added setting out that for flatted development a financial contribution may be acceptable in exceptional circumstances in lieu of onsite provision of electric charging points. | <p>the Table under paragraph 5.6 of the SPD:</p> <p><i>'For flatted developments and apartments where the parking may be some distance from the dwellings, it may not always be feasible or appropriate to include the charging point requirement onsite. Therefore, in exceptional circumstance such as this, the possibility of financial contributions may be considered.'</i></p> |
| 4 | Hagley Parish Council (Alexandra Burkes) | <p>The Respondent highlights the effect that transient traffic between the adjoining conurbations to Dudley and the other main centres of the Black Country has on Hagley and its adopted Air Quality Management Area (AQMA). The AQMA has monitored NOx emissions since 2009 with a number of monitoring points showing in excess of the regulation maximum of 40 NOx.</p> <p>The Respondent considers that this effect is pronounced by the attraction of Merry Hill Shopping Centre and the recent announcement that Brierley Hill is to be given investment to create its own Enterprise Zone. This means that there is significant pressure on the already congested A456 and A491, this intersection is considered by the Respondent to be the busiest A Road network in Worcestershire and amongst the busiest in Birmingham and the Black Country.</p> | <p>The Respondent's comments are of a strategic nature and are considered to be outside the scope of the SPD.</p> <p>The Respondent's comments have been passed to Dudley Council's Highways Service for consideration.</p> | No change required |

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| 4 | Hagley Parish Council (Alexandra Burkes) | <p>The Respondent is concerned with the effect of poor air quality, particulate matter and general ill effects of air pollution and traffic pollution throughout Hagley and asks that positive measures are taken to support pollution eradication as in the direction of recent EU pressure on the UK Government.</p> <p>The Respondent asks that the SPD takes positive action to relieve traffic flows through Hagley enroute to the Black Country through:</p> <ul style="list-style-type: none"> • Investment in Public Transport • Investment in congestion mitigation along the A456 and A491 in Hagley • Air Quality improvements in Hagley • Investment provided to Hagley Parish Council to manage highways improvements in conjunction with Worcestershire Highways • Alternative routes to popular destinations in the Black Country being advertised and encouraged. <p>The Respondent would welcome the opportunity to engage in more detailed discussion as part of the development of the SPD in coming months.</p> | <p>The Respondent's comments are of a strategic nature and are considered to be outside the scope of the SPD.</p> <p>The Respondent's comments have been passed to Dudley Council's Highways Service for consideration.</p> | No change required |
| 5 | Highways England (Patricia Dray, Asset Manager) | <p>The Respondent notes that the Strategic Road Network (SRN) (for which it is responsible for its operation and maintenance) is a critical national asset and as such the Respondent works to ensure that it operates and is managed in the public interest which includes preventing locations in the vicinity of the SRN from breaching national air quality objectives.</p> <p>The Respondent notes that the SPD identifies hotspots, where national air quality objectives are being breached, which include part of the SRN on the M6 Motorway and some sections of the M5 Motorway.</p> | Comments Noted | No change required |
| 5 | Highways England | Highways England acknowledges that Councils within the Black Country wish to encourage sustainable | Comments Noted | No change required |

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| | (Patricia Dray, Asset Manager) | development through more stringent use of the planning process. The Respondent recognises their own contribution to that process will assist in improving the integration between existing land-sues and new development. | | |
| 5 | Highways England (Patricia Dray, Asset Manager) | The Respondent agrees with the model approach that is advocated and which aims to integrate air quality consideration into spatial planning policies. It should be appreciated that this new approach would require mitigation features and, in some case, compensation in relation to some development proposals. | Comments Noted | No change required |
| 5 | Highways England (Patricia Dray, Asset Manager) | The Respondent agrees that Air Quality Assessments must address potential cumulative impacts resulting from development proposals in the vicinity of other new development proposals, believing that the changes in modelling approach will contribute to a better understanding of impacts and will allow the design of appropriate mitigation measures. | Comments Noted | No change required |
| 6 | Historic England (Rosamund Worrall, Historic Environment Planning Advisor (West Midlands)) | Historic England agrees with the conclusion of the screening exercise that an SEA is not required in respect of the Black Country Air Quality SPD. | Comments Noted | No change required |
| 6 | Historic England (Rosamund Worrall, Historic Environment Planning Advisor (West Midlands)) | The Respondent welcomes the joint approach to producing an air quality strategy for the Black Country, which has a rich and varied historic environment, since poor air quality can have an adverse impact on the condition of the historic environment. On the basis of the current content of the Air Quality SPD, Historic England has no concerns or other comments to make at this stage. | Support Noted | No change required |
| 7 | Intu Properties plc (Nick Hollands, Principal Planning | As a significant stakeholder in the locality and potential major developer in coming years, Intu welcomes the opportunity to comment of the SPD as this covers a relevant facet of the future development process. | Noted | No change required |

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| | Consultant, Paris Smith LLP) | | | |
| 7 | Intu Properties plc (Nick Hollands, Principal Planning Consultant, Paris Smith LLP) | The Respondent considers that the draft SPD does not make clear the specific range of factors that constitute 'damage' as represented by the cost, i.e. damage in what respects and to what factors and interests? It is also not made clear if the cost benefit information was devised with any specific intention that it might be applied in the town planning context. | The respondent's comments are dealt with in Defra publication: <i>"Valuing impacts on air quality: Updates in valuing changes in emissions of Oxides of Nitrogen (NOX) and concentrations of Nitrogen Dioxide (NO2) September 2015"</i> This document provides clarification and therefore a link has been added to Appendix 3. | Appendix 3 links added: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/460401/air-quality-econanalysis-nitrogen-interim-guidance.pdf http://laqm.defra.gov.uk/review-and-assessment/tools/emissions-factors-toolkit.html |
| 7 | Intu Properties plc (Nick Hollands, Principal Planning Consultant, Paris Smith LLP) | The Respondent considers that whilst the draft SPD indicates that the 'damage cost' factor 'can be used to determine the level' of mitigation and/or compensation, it is not clear whether it would be used as a general guide, or as a firm financial target to be fulfilled through specific measures and/or financial contributions. If the latter (i.e. a firm financial target) the Respondent considers that this may be unreasonable in that one of the three essential dimensions of sustainable development is the economic role, together with social and environmental. To perform an effective economic role in sustainable development, it is likely that many forms of major development will have some environmental impacts, including on air quality. | The impact of a proposed development and its associated damage costs will be based upon the outcomes of any air quality assessments undertaken in relation to the proposed development. Assessments should summarise air quality impacts (and associated costs) and propose mitigation measures for consideration by individual Planning Authorities. | Updated Appendix 3 |
| 7 | Intu Properties plc (Nick Hollands, Principal Planning Consultant, Paris Smith LLP) | The Respondent suggests that without further explanation of its application, the 'damage costs' aspect should be removed from the approach put forward in the draft SPD and any necessary mitigation/compensation negotiated, as appropriate, in the light of the individual circumstances and assessed impacts of the major | Defra provides detailed guidance explaining how impacts on air quality should be incorporated into cost benefit analysis. Links to this and other information | Updated Appendix 3 -link added https://www.gov.uk/guidance/air-quality-economic-analysis |

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| | Smith LLP) | development in question. | resources is provided at: https://www.gov.uk/guidance/air-quality-economic-analysis | |
| 7 | Intu Properties plc (Nick Hollands, Principal Planning Consultant, Paris Smith LLP) | <p>The Respondent considers that special care is necessary in addressing the air quality impacts of major retail or other related town centre development. In particular, it is considered important that any emissions impact is assessed as far as possible as a <u>net</u> quantity.</p> <p>This is because if major retail and related development with the necessary infrastructure was to be proposed at a main centre in the development plan, it is to be hoped this would compete positively with existing primarily car served development in out of centre locations.</p> <p>The Respondent considers that this trade redistribution, whilst potentially resulting in some additional traffic and possible emissions in the locality of the recognised centre to be enhanced, could significantly reduce traffic and emissions elsewhere. Indeed, in net terms, the Respondent considers that an overall reduction in emissions is conceivable when considered on an appropriately broad canvas.</p> <p>The Respondent considers that if such positive net effects overall were to be identified in a transport assessment for a major retail development, these should be fully taken into account in determining any necessary mitigation/compensation related to air quality. This aspect should be acknowledged in the SPD.</p> | <p>The impact of a proposed development and its associated damage costs are based upon the outcomes of any air quality assessments undertaken in relation to the proposed development.</p> <p>Developers may wish to interpret assessment results and should do so in the summary section that deals with air quality impacts arising.</p> <p>Appropriate air quality assessment protocols (Appendix 1) should be followed.</p> | Updated Appendix 3 |
| 8 | Lichfield District Council (Ashley Baldwin – Spatial Planning and Delivery Manager) | The Respondent notes that as the draft SPD largely adopts the work undertaken by the Low Emissions for Towns and Cities Programme towards within the District Council has contributed, the Respondent has nothing to add regarding the technical aspects of the draft SPD | Noted. | No change required. |
| 8 | Lichfield District Council | The Respondent considers that parity is required across the black Country's CIL policies as set out in paragraphs | Paragraphs 5.22-5.23 relate to dealing with exceptional | No change required. |

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| | (Ashley Baldwin – Spatial Planning and Delivery Manager) | 5.22-5.23 of the SPD. The exceptional circumstances relief is at the discretion of the CIL charging authority and the respondent considers that the SPD appears to contradict Sandwell’s CIL which apparently has no ‘exemptions, relief and exceptional circumstances’ or ‘in kind’ policies. | <p>circumstances in relation to viability and not in relation to CIL.</p> <p>The references to CIL within the SPD (paragraphs 5.20-5.21) purely explain what CIL is and do not make specific reference to any particular CIL Charging regimes.</p> <p>As such it is considered that there is no contradiction within the SPD to any CIL Charging Schedules within the Black Country.</p> | |
| 9 | Natural England (Grady McLean, Lead Adviser – Sustainable Development) | The Respondent considers that the topic of the SPD does not appear to relate to their interests to any significant extent. As such the Respondent does not wish to comment. | Noted | No change required. |
| 9 | Natural England (Grady McLean, Lead Adviser – Sustainable Development) | Natural England agrees with the conclusion of the screening exercise that an SEA is not required in respect of the Black Country Air Quality SPD. | Noted | No change required. |
| 10 | Air Quality Consultants (Penny Wilson) | <p>Whilst appreciating that the Protocol has been taken directly from the West Midlands Low Emissions Good Practice Air Quality Planning Guidance, the Respondent considers that one of the requirements is no longer considered good practice.</p> <p>It requires that the assessment includes “a sensitivity test which assumes that there will be no reduction in traffic related emission factors from the baseline year.” This approach was originally conceived by Air Quality Consultants some years ago in the absence of any specific information about on-road vehicle emissions</p> | Agree. | <p>Amend the wording relating to a Sensitivity Test within Appendix 1 from:</p> <p><i>'A sensitivity test which assumes that there will be no reduction in traffic related emission factors from the baseline year'</i></p> <p>To be replaced by:</p> |

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| | | <p>and has since been adopted by a number of Local Authorities and practitioners.</p> <p>Since that time, testing of on-road vehicles has been carried out and more information has become available. In light of this new information, Air Quality Consultants has developed a new approach to sensitivity testing predicted concentrations in a future year, which suggests that the approach recommended in the West midlands Guidance is unnecessarily pessimistic. Further information is available at: www.aqconsultants.co.uk/News/February-2016/New-Sensitivity-Test-for-NOx-Emissions-from-Euro-6.aspx</p> | | <i>'A sensitivity test shall be carried out using real world emission data in line with current best practice'</i> |
| 10 | Air Quality Consultants (Penny Wilson) | The Respondent notes that the Damage Costs presented in Appendix 3, Table 2, are not the most recent available. | Noted and amended | Updated Appendix 3 - out of date information removed and new links provided |
| 11 | Road Haulage Association (Rhys Williams, Area Manager) | The Respondent considers that a flourishing road haulage sector is an essential part of the Black Country economy, with transport and logistics being a very significant component of the economy in the Midlands, as well as being a major employer. Trucks deliver goods to commercial enterprises, the general public, and to public sector bodies such as schools and hospitals. As such the Respondent urges the authorities of Dudley, Sandwell, Walsall and Wolverhampton to do what they can to support the industry as this process progresses. | Comments Noted | No change required. |
| 11 | Road Haulage Association (Rhys Williams, Area Manager) | The Respondent accepts that the Black Country authorities must take action and notes that as a consequence of a Supreme Court case last year, DEFRA has written to all local authorities seeking their co-operation in achieving compliance with the air quality standards. | Support Noted | No change required. |
| 11 | Road Haulage Association (Rhys Williams, Area Manager) | The Respondent welcomes the acknowledgement on page 6 that a commitment to improve air quality must be balanced against other aims of the planning system in order to achieve social, economic and environmental goals, and request that the contribution of the haulage | Comments Noted | No change required. |

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| | | sector as an essential support to business and also as a major employer is borne in mind as the strategy develops. | | |
| 11 | Road Haulage Association (Rhys Williams, Area Manager) | <p>The Respondent understands the approach taken in the draft SPD in terms of classifying proposals which are likely to have major air quality impacts.</p> <p>However the Respondent stresses that any development such as the creation or enlargement of an industrial estate or of a freight consolidation centre could have massive benefits for the economy of the Black Country in terms of employment, as well as allowing for HGVs to be routed away from urban and residential centres, meaning that 'last mile' freight can be transported using lower emissions vehicles.</p> <p>The Respondent states that in some situation the optimal solution is to route HGV traffic away from population centres, which will result in truck traffic on some diversion roads increasing beyond 10% of total trips. In the view of the Respondent, such options should not be ruled out simply because truck traffic increases significantly on certain roads, if the routing has overall benefits in terms of improving traffic flow on other roads and reducing emissions near centres of population.</p> <p>The Respondent urges the Black Country authorities to build consideration of the possibility of such positive outcomes from development into its thinking, and to avoid too narrow a view of what is likely to constitute welcome development that will have a negative air quality impact.</p> | Comments Noted | No change required. |
| 11 | Road Haulage Association (Rhys Williams, Area Manager) | The Respondent notes from page 15 of the draft SPD that there is an intention to create travel plans that seek to discourage high emission vehicles and encourage modal shift. The Respondent stresses that without significant investment in infrastructure and alternative technologies, road freight is likely to remain the | Comments Noted | No change required. |

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| | | dominant mode, and so facilitating truck movements in order to support trade and employment will remain crucial if the economy of the Black Country is to thrive. | | |
| 11 | Road Haulage Association (Rhys Williams, Area Manager) | <p>The Respondent has concerns that the Black Country authorities should not underestimate the impact of a push to adopt low emission vehicles on smaller hauliers, if the drive is too fast and undertaken without consulting these businesses about their capacity to adapt, including an assessment of the financial resources to which they have access, and their business cycles for replacing existing higher emitting vehicles.</p> <p>The Respondent makes reference to the fact that purchasers of new trucks must comply with the Euro VI standard which was introduced in 2014, so progress is already being made in the sector.</p> | <p>Comments Noted</p> <p>Each development proposal will be assessed individually and all relevant circumstances will be considered, including those raised by the Respondent, before mitigation measures are agreed.</p> | No change required. |
| 11 | Road Haulage Association (Rhys Williams, Area Manager) | <p>The RHA supports the use of consolidation centres on the outskirts of population centres, where HGVs come off the motorway, before goods are transferred onto smaller trucks or vans before they are sent to their final destination. However we would point out that consolidation centres may not be appropriate as a solution in all circumstances since a large numbers of lighter vans might be required to replace large trucks, and these vans could generate much more air pollution, as well as creating more congestion, unless the process of introducing low emission vehicles of all types is properly handled.</p> <p>It is also worth saying that without the co-operation of the customers of delivery firms, coordination of deliveries may be difficult to achieve since hauliers respond to customer demand, and do not set the schedules themselves.</p> <p>Therefore it is important to state that if the plan does not take into account the delivery and collection patterns of businesses, it is possible that the economy of Black</p> | <p>Comments noted, however this is outside the scope of this SPD.</p> | No change required. |

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| | <p>Country will be disrupted, and if this happens there could be an impact on employment.</p> <p>The Respondent asks that consideration is given to the lifting of any night-time delivery restrictions which force truck operators to use the roads at the most congested times. If vehicles can deliver to retail premises and depots in off-peak hours then trucks will not be on the roads at the busiest periods and so there should be air pollution reduction and carbon saving, as well as road safety benefits.</p> <p>The Noise Abatement Society ran a number of quiet delivery trials from 2009/11, which demonstrated that such initiatives could work very well. Details of the scheme can be found by clicking on the link.</p> <p>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/4007/quiet-deliveries-demo-scheme-final-project-report.pdf</p> <p>The Department for Transport has produced quiet deliveries good practice guidance for local authorities, as well as hauliers, which you can find by going to the link below.</p> <p>https://www.gov.uk/government/publications/quiet-deliveries-demonstration-scheme</p> <p>Vehicle manufactures are meeting the demand to supply clean, quiet vehicles aimed at night time delivery reducing the need for smaller vehicles to be involved last mile & out-of-hours deliveries. An example of such vehicles can be found here:</p> <p>http://www.daf.com/en/news-and-media/articles/global/2014/28-08-2014-daf-presents-extra-quiet-cf-distribution-truck</p> <p>In summary the RHA suggests that the involvement of</p> | | |
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| | | businesses across the Black Country which receive as well as deliver goods is essential if the initiative is to achieve a significant improvement in air quality. | | |
| 11 | Road Haulage Association (Rhys Williams, Area Manager) | <p>For some time the RHA has provided information to its members about the available low-emission technologies and so would be keen to work with the Black Country councils to help hauliers switch to less polluting vehicles in a time frame that does not make their businesses unviable.</p> <p>Hauliers and other commercial vehicle operators need certainty about low emission proposals so that they can make proper vehicle purchasing decisions. Uncertainty about the business environment could have a negative impact on the haulage sector with knock-on consequences in terms of employment within the sector in the area.</p> | Comments Noted | No change required. |
| 11 | Road Haulage Association (Rhys Williams, Area Manager) | The RHA welcomes any initiatives to encourage eco driver training, and confirms that many RHA members already have eco driving integrated into their operations. | Agree that it would be appropriate to add eco driver training as a possible mitigation measure under Paragraph 5.7 | Add new bullet point under the section in Paragraph 5.7 on 'Commercial Development – additional types of mitigations' to read: 'Eco driver training for drivers of commercial vehicles.' |
| 11 | Road Haulage Association (Rhys Williams, Area Manager) | The Respondent suggests that in terms of traffic management, they would like to see proposals pursued to upgrade IT systems in order to provide improved real time travel information that will help traffic flow smoothly, instead of stopping and starting. Hauliers have themselves already embraced the use of intelligent transport technologies which help in the efficient running of their businesses, and are likely to reduce congestion. In particular we suggest that traffic light phasing is considered, since proper phasing can help smooth traffic flow, which in turn helps to reduce congestion and pollution. | Comments noted, however this is outside the scope of this SPD. | No change required. |

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| | | <p>The Respondent also stresses that the proper positioning of road signs is of crucial importance to truck drivers, as well as other motorists. Good signage helps drivers to find correct places to park and load, but also to avoid the risk of missing turnings and, for example, hitting low bridges because signs are in the wrong place, because they are positioned too close to bridges so high vehicles have insufficient time to turn away. Therefore proper signage helps to reduce congestion, and so will have an impact on emissions reduction as well as business efficiency.</p> <p>The Respondent notes that recent research from the RAC Foundation has found that some 2,375 local authority maintained bridges are not fit to carry the heaviest vehicles, including lorries of up to 44 tonnes which inevitably leads to trucks having to take longer routes, with the related extra pollution effects.</p> <p>The Respondent hopes that efforts are made to identify congestion hot-spots as well as the rat-run routes that are used by trucks when main roads are too busy, so that any new infrastructure development can act to relieve existing problems since dealing with and minimising congestion can help reduce carbon emissions and air pollution.</p> | | |
| 12 | Walsall Group of the Ramblers (Dick Turton) | The Respondent welcomes all efforts to control air quality both within Walsall and across the Black Country as a whole. | Support Noted. | No Change Required. |
| 12 | Walsall Group of the Ramblers (Dick Turton) | As a walking organisation, the Respondent notes that the Group always encourages walking as an alternative to other transport options where this is feasible, since it not only reduces the number of short car journeys that need to be made, and thus the associated impact on air quality, but also serves to provide healthy exercise for both children and adults which can be a great benefit to them in later life. | Noted | No Change Required |
| 12 | Walsall Group of | The Respondent considers that establishing additional | Agree. Encouraging links to | Add additional bullet point |

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| | the Ramblers (Dick Turton) | <p>walking / cycling routes to new high impact developments are generally not something that can be achieved in isolation when a specific site is created, but something that requires integration into the wider expansion and re-development of the entire borough.</p> <p>With references to the Group's involvement in the provision of new Rights of Ways (ROWs) on new housing estates and protecting and maintaining existing ROWs, the Respondent considers that this type of action needs to be continued.</p> <p>As such the Respondent suggests that when a future site is being considered for development and mitigation is going to be required, suitable walking/cycling routes can be more easily implemented through established ROWs so that safe, well-maintained, lit and clearly marked alternative routes to work and school etc are easily implemented.</p> | existing Rights of Way (ROW) can improve opportunities for walking and thus be a practical mitigation measure for new developments. | <p>under 'All Development' within paragraph 5.7 to state:</p> <p>'Encourage links to existing Rights of Way (ROW) in order to improve opportunities for walking.'</p> |
| 13 | West Midlands Integrated Transport Authority (ITA) (Helen Davies, Economic Development and Social Cohesion) | <p>Overall, the SPD on Air Quality is supported by the ITA and it clearly sets out an approach to tackle air quality issues and mitigate any problems arising from transport emissions.</p> <p>However there are areas where the ITA would support a more positive partnership working with the Black Country local authorities to develop further the sustainable transport options to improve air quality.</p> | Comments Noted | No Change Required |
| 13 | West Midlands Integrated Transport Authority (ITA) (Helen Davies, Economic Development and Social Cohesion) | The ITA are extremely supportive of this chapter but would like to see reference being made to the importance of reducing the environmental impacts of transport and the promotion of more sustainable access for people within the region. | Accept. | <p>Add additional sentence at the end of paragraph 2.10 to state:</p> <p>'This includes reducing the environmental impacts of transport and the promotion of more sustainable access for people within the region.'</p> |
| 13 | West Midlands | Despite the chapter making clear the importance of | Agreed that it would be helpful | Add two new paragraph after |

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| | <p>Integrated Transport Authority (ITA) (Helen Davies, Economic Development and Social Cohesion)</p> | <p>managing the transport impacts of new developments and the role of transport in meeting air quality targets, the ITA feel that a stronger link to ITA policy should be acknowledged and thus, the following policy documents should be noted in the SPD:</p> <p>West Midlands ITA's Strategic Transport Plan 'Movement for Growth'</p> <p>Consideration should be given to this approved plan which covers a 20 year time period (http://wmita.org.uk/strategy-and-publications.aspx) which sets out the overarching transport strategy and sets out targets to reduce air quality impacts from transport. The Respondent provides examples of air quality related policies within the Strategic Transport Plan:</p> <p>Our Vision</p> <ul style="list-style-type: none"> • Reduce transport's impact on our environment – improving air quality, reducing carbon emissions and improving road safety <p>Economic Growth and Economic Inclusion</p> <ul style="list-style-type: none"> • Policy 1 – To accommodate increased travel demand by existing transport capacity and new sustainable transport capacity. <p>Environment</p> <ul style="list-style-type: none"> • Policy 9 – To significantly improve the quality of the local environment <p>Public Health</p> <ul style="list-style-type: none"> • Policy 11 – To significantly increase the amount of active travel in the West midlands Metropolitan Area • Policy 13 – To assist with the reduction of health inequalities in the West Midlands Metropolitan Area | <p>to make reference to the approved Strategic Transport Plan and the emerging Transport Emissions Framework within Section 3 of the SPD.</p> | <p>3.9 as follows:</p> <p>'West Midlands Integrated Transport Authority (ITA) Strategic Transport Plan 'Movement for Growth'</p> <p>Setting out the overarching transport strategy for the next 20 years, this Plan sets out targets to reduce air quality impacts from transport. https://westmidlandscombine.dauthority.org.uk/media/1178/2016-06-01-mfg-full-document_wmca.pdf</p> <p>West Midlands Transport Emissions Framework</p> <p>This emerging framework signifies the increased importance of air quality and builds upon the current work being undertaken by the various authorities in the West Midlands as well as the Government, businesses, freight and transport operators and the wider public sector, communities and commuters.'</p> |
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| | | <p>West Midlands Transport Emissions Framework</p> <p>The Framework signifies the increased importance of air quality in the transport agenda and should be noted in the SPD. The Framework builds on the current work undertaken by the various authorities in the West Midlands as well as the Government, businesses, freight and transport operators and the wider public sector, communities and commuters.</p> | | |
| 13 | <p>West Midlands Integrated Transport Authority (ITA) (Helen Davies, Economic Development and Social Cohesion)</p> | <p>Combined Authority policies on Air Quality</p> <p>The Respondent considers that as the area enters into a Combined Authority, a more co-ordinated regional approach is required to tackle air quality issues and improve overall transport emissions. The West Midlands Transport Emissions Framework will understand the wider transport impact on air quality and also land use planning, environmental control, public health and energy policy agendas and aligned to the move to a Combined Authority and Devolution Deal, which states:</p> <p><i>“The West Midlands Combined Authority Shadow Board will bring forward proposals for potential inclusion in the West Midlands Mayoral Parliamentary Order that would enable the West Midlands Mayor and West Midlands Combined Authority to implement Low Emission Zones and potentially Clean Air Zones in the West Midlands Combined Authority area ... to achieve Air Quality Plan objectives at both the national and local level.”</i></p> <p>The Combined Authority approach will use a similar style ‘London Transport Emissions Roadmap – Cleaner transport for a cleaner London’ developed by TfL. This Roadmap outlines 10 measures to be addressed. http://content.tfl.gov.uk/transport-emissions-roadmap.pdf</p> <p>A combined authority approach will also provide more consistency across the Black Country and wider</p> | <p>Agree that reference to the West midlands Combined Authority and the emerging approach would assist in setting the context of the SPD.</p> | <p>Add two new paragraphs between paragraphs 2.6 and 2.7 to read: <i>“Achieving a fully integrated rail and rapid transit network that connects main centres is a key theme for the West Midlands Combined Authority. By delivering this, it is intended the impact of transport on the environment will be reduced, so improving air quality. The resulting transport network will enable more efficient movement goods freight.</i></p> <p><i>It is also intended to develop a West Midlands Metropolitan Area Transport Emissions Framework in partnership with local councils to ‘clean’ transport networks and tackle air quality problems. Making progress to provide clean air and tackling poor air quality are key policy objectives within the West Midlands</i></p> |

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| | | <p>Metropolitan area particularly concerning mapping and modelling of air quality.</p> <p>The Respondent notes that each of the Nitrogen Dioxide Exceedence Maps applies a different format / style and a metropolitan wide map, and suggests that a map highlighting all areas of Nitrogen Dioxide Exceedence would provide more consistency.</p> | <p>Agreed, a Black Country wide map will be incorporated into the SPD to replace the 4 individual maps.</p> | <p><i>Strategic Transport Plan “Movement for Growth”, and has direct links to strategic Public Health initiatives.”</i></p> <p>Appendix 4 to be updated with Black Country Wide map, replacing the 4 individual maps in the draft SPD</p> |
| 13 | <p>West Midlands Integrated Transport Authority (ITA) (Helen Davies, Economic Development and Social Cohesion)</p> | <p>The Respondent has concerns that the air quality monitoring is inconsistent across the metropolitan area. For example Birmingham and the Black Country use different models, therefore identifying how we can develop a standard evidence base to record and monitor air quality is a principle the Combined Authority want to explore over the coming years.</p> | <p>Noted, however this is outside of the scope of the SPD.</p> <p>The Black Country Councils have a consistent approach to monitoring air quality.</p> | <p>No Change required.</p> |
| 13 | <p>West Midlands Integrated Transport Authority (ITA) (Helen Davies, Economic Development and Social Cohesion)</p> | <p>The Respondent suggests reference is made to the Metropolitan Main Road Network (also known as the Key Route Network) which has been defined by the Combined Authority and will consider the air quality and carbon emissions impacts. The Key Route Network will serve the main strategic demand flows of people and freight across the metropolitan area, and provide connections to the National Strategic Road network. It will also support highway capacity effectively to cater for movement by rapid transit and core bus route, the Metropolitan Cycle Network, lorries, vans and private cars.</p> | <p>Agreed, reference to the Metropolitan Main Road Network will be incorporated into the SPD.</p> | <p>New paragraphs 3.12 and 3.13 added to read:</p> <p>The West Midlands Key Route Network (WM KRN)</p> <p>As part of the West Midlands Combined Authority (WMCA) Devolution Deal, the Mayoral role seeks functions under the Road Traffic Regulation Act to enable a WM KRN to be statutorily defined. The government will thus work with the WMCA to establish any appropriate local traffic and highway powers to be conferred as part of the KRN.</p> |

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| | | | | <p>In doing so this will enable Orders to be designated (such as 'Safer Vehicles', 'Air Quality', 'Moving Traffic Violation') that are uniquely identified for the WM KRN, or the equivalent provisions sought in order to allow the WMKRN of local authority roads to be strategically managed and coordinated at the West Midlands Metropolitan level, with joint asset management and procurement.</p> <p>The Mayor of the CA will exercise powers - with personal accountability to the electorate - devolved from central government and set out in legislation. This incorporates an over-arching responsibility for an identified KRN of local authority roads that will be collaboratively managed and maintained at the Metropolitan level by the Combined Authority.</p> <p>In the context of local air quality, the Mayor and the Mayoral West Midlands Combined Authority will have the power to create Low Emissions Zones and Clean Air Zones, with the affected highway authority(ies)</p> |
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| | | | | consent. A joint WMCA/Mayoral function, and the devolution agreement accordingly includes a provision for reporting on the WM KRN. |
| 13 | West Midlands Integrated Transport Authority (ITA) (Helen Davies, Economic Development and Social Cohesion) | <p>The ITA support this chapter but request that additional measure be included under paragraph 4.11:</p> <ul style="list-style-type: none"> • Stronger emphasis on active travel measures including the development of the Metropolitan Strategic Cycle Network - linked to the ITA Cycle Charter and Strategic Transport Plan together with the emerging Black Country Cycling and Walking Strategy; • A stronger view by the Black Country on developing a Clean Air Zone as well as Low Emission Neighbourhoods and Green Travel Districts; and • Establishment of car clubs within new developments. | <p>The SPD already makes reference to improving cycle paths to link the cycle network (para. 5.7) and car clubs (para. 5.11) as possible mitigation measures.</p> <p>Until the designation of Clean Air Zones is adopted it is considered premature and inappropriate to include this within the SPD.</p> | No Change required. |
| 13 | West Midlands Integrated Transport Authority (ITA) (Helen Davies, Economic Development and Social Cohesion) | <p>The Respondent strongly welcomes the measures proposed in chapter 5 for minimising unacceptable air quality, and suggests a number of additional measures that are proposed within the West Midlands Transport Emissions Framework be noted in this chapter:</p> <ul style="list-style-type: none"> • Developing and adopting agreed metropolitan wide policies and actions for Low Emission Zones or Clean Air Zones - in specific and suitable locations such as town centres; • Bus Alliance Emission objectives through the ITA Bus Alliance and the West Midlands Low Emissions Bus Delivery Plan; • Making traffic management and regulation smarter through a West Midlands Key Route Network (KRN); • Metropolitan wide targets for the cleaning of public | <p>Agree that reference to the West Midlands Transport Emissions Framework is required within the SPD.</p> <p>As and when the emerging West Midlands Transport Emissions Framework is adopted across the Black Country relevant initiatives set out within this Framework can and will be sought. To this end Paragraph 5.11 of the SPD already states that other mitigation measures within Low Emission Strategies may</p> | <p>Add new paragraph after 3.9 as follows:</p> <p>West Midlands Transport Emissions Framework</p> <p>This emerging framework signifies the increased importance of air quality and builds upon the current work being undertaken by the various authorities in the West Midlands as well as the Government, businesses, freight and transport operators and the wider</p> |

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| | | <p>and commercial fleets;</p> <ul style="list-style-type: none"> • Active travel measures and the development of the Metropolitan Strategic Cycle Network - linked to the ITA Cycle Charter, Strategic Transport Plan and emerging Black Country Walking and Cycling Strategy; • Policies towards zero emissions taxi and private hire fleets; • Low Emission Neighbourhoods and Green Travel Districts; and • Consistent recording and monitoring practices across the Metropolitan area. | <p>be required, relevant to a particular development.</p> <p>As the Strategy is still emerging it is considered inappropriate at this point to add specific initiatives into the SPD.</p> | <p>public sector, communities and commuters.'</p> |
| 13 | <p>West Midlands Integrated Transport Authority (ITA) (Helen Davies, Economic Development and Social Cohesion)</p> | <p>The WMITA would like to reiterate their support for the partnership approach that has been taken to addressing the strategic transport needs of the plan and the wider area and would welcome further dialogue as this plan develops.</p> <p>The Respondent is also keen to explore funding mechanisms available through the planning system to make improvements to improving air quality, together with a delivery framework in partnership with Local Authorities, Stakeholders and Government.</p> | <p>Noted</p> | <p>No Change required</p> |
| 14 | <p>Andrew Whittles</p> | <p>The Respondent notes that Defra updated the damage costs for NOx last September to reflect increased awareness of health impacts of NO2 – which suggests as an inner conurbation you a figure of £61,000 per tonne rather than £955 - see below:</p> <p>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/460401/air-quality-econanalysis-nitrogen-interim-guidance.pdf</p> | <p>Noted and amended</p> | <p>Updated Appendix 3 - out of date information removed and new links provided</p> |
| 14 | <p>Andrew Whittles</p> | <p>The Respondent suggests that for fleet operations the SPD should say current Euro Standard rather than current and previous. Euro VI came in at the end of 2013 - if you have an application say for a supermarket it will probably open in 2018</p> | <p>Agree.</p> | <p>Amend the section on Commercial Development – additional types of mitigation under paragraph 5.7 from: 'All commercial vehicles</p> |

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| | | - Euro VI will be 5 yrs old which is reasonable rather than including Euro V which will be 9 years. | | <p><i>should comply with either current or previous European Emission Standards from the development opening, to be progressively maintained for the lifetime of the development; ‘</i></p> <p>To:</p> <p><i>‘All commercial vehicles should comply with current European Emission Standards from the development opening, to be progressively maintained for the lifetime of the development; ‘</i></p> |
| 14 | Andrew Whittles | The Respondent notes that the SPD should be specifying low NOx boilers as type 1 mitigation (cf reference in para. 100 Defra Plans to improve AQ) | Agree that it is appropriate to make reference to low NOx boilers within the SPD, including within Paragraphs 4.14, 5.5 and Appendix 6. | <p>Amend Type 1 mitigation in paragraphs 4.14 and 5.5 to include low NOx boilers as follows:</p> <p>4.14 The required mitigation is summarised as:</p> <p><input type="checkbox"/> Type 1 – Electric Vehicle charging points, the installation of low NOx boilers and the adoption of an agreed protocol to control emissions from construction.</p> <p>Type 1 – Electric Vehicle Charging Points and Low NOx Boilers</p> <p>5.5 As a minimum, new developments should include the provision of electric</p> |

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| | | | | <p>vehicle charging points, the installation of low NOx boilers plus any mitigation requirements arising from the exposure assessment where applicable.</p> <p>New example planning condition to be added to Appendix 6 as follows:</p> <p>In order to minimise the impact of the development on local air quality any gas boilers provided must meet a dry NOx emission concentration rate of <40mg/kWh. The specification of the gas boiler(s) shall be submitted to and approved in writing by the Local Planning Authority before they are fitted and the approved specification shall be implemented prior to the first occupation of the development and shall be maintained for the lifetime of the development.</p> |
| 14 | Andrew Whittles | The Respondents suggests that for major schemes that contribute to key LES/AQ mitigation measures ie low emission buses, damage costs are calculated based on the first year of operation only rather than aggregating 5 years (as per West Yorkshire Guidance) | Noted and wording amended | Appendix 3 text amended: “The road transport emission increase should be calculated in accordance with Defra guidance up to a maximum of 5 years”. |
| 15 | Woodland Trust (Justin Milward, Lead | The Respondent is disappointed that Chapter 5 makes no reference to the important role that the natural environment and/or green infrastructure – such as trees | Comments Noted. Agree that reference should be | Add a new bullet point under ‘All Development’ in paragraph 5.7 stating: |

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| | <p>Government Affairs Officer – Local)</p> | <p>and woodland – can play in contributing to good air quality. The Respondent notes that the only references in the SPD are in paragraphs A4.11 and A4.12.</p> <p>The Respondent notes that Trees can improve air quality through the adsorption of particulates from vehicle emissions and other sources – such that it has been estimated that doubling the tree cover in the West Midlands alone would reduce mortality as a result of poor air quality from particulates by 140 people per year. (Stewart, H., Owen S., Donovan R., MacKenzie R., and Hewitt N. (2002). Trees and Sustainable Urban Air Quality. Centre for Ecology and Hydrology, Lancaster University).</p> <p>The Woodland Trust has published a report on how trees can specifically help improve air quality – see Urban Air Quality - https://www.woodlandtrust.org.uk/publications/2012/04/urban-air-quality/.</p> <p>Urban heat island: Trees and woods can also reduce the impact of the ‘urban heat island effect’ which occurs when hard surfaces in summer act as giant storage heaters, absorbing heat during the day and releasing it at night. Dramatic summer temperature differences of as much as 10°C between London and its surrounding areas have been recorded, which in turn exacerbate the symptoms of chronic respiratory conditions. Projections suggest this problem will get markedly worse. A study by the University of Manchester has shown that increasing tree cover in urban areas by 10% could decrease the expected maximum surface temperature in the 2080s by up to 4°C (Handley, J and Carter, J (2006) Adaptation strategies for climate change in the urban environment, Draft final report to the National Steering Group, Centre for urban and regional ecology, University of Manchester). This will also help mitigate</p> | <p>made within the SPD to the benefit that trees and landscaping can provide as a mitigation measure for air quality.</p> | <p><i>‘The provision of trees and landscaping features where appropriate.’</i></p> |
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| | <p>the effect of poor air quality in summer heatwaves.</p> <p>Some local authorities are already adopting good policy wording reflecting the positive role that trees can play for air quality –</p> <p>Stroud District Local Plan (adopted November 2015) sets out that –</p> <p><i>Paragraph 6.66 Natural greenspaces are very important to our quality of life. They provide a wide range of benefits for people and the environment.In addition to their potential ecological value, greenspaces also help us adapt to changes in climate through their role in reducing the risk of flooding and by cooling the local environment. Where trees are present they also act as filters for air pollution. Nature nearby is good for people, good for wildlife and good for the environment.</i></p> <p>Poole Town Centre - Supplementary Planning Document (Adopted December 2015) states that</p> <p>Green the town <i>Green infrastructure enhances the visual appearance, perceptions of quality, and sustainability, of places.</i></p> <ul style="list-style-type: none"> <i>• Trees can help reduce the impact of “urban heat islands”, where hard surfaces soak up heat in summer during the day and release it at night. This has been found to adversely impact health.</i> <i>• Trees absorb particulates from vehicle emissions and other sources and help improve air quality.</i> <i>• Suitable trees should be planted where space is limited.</i> <p>To conclude the Respondent would like to see the Black Country Air Quality SPD include a reference to the beneficial support that trees and woods can give to</p> | | |
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| | | improving air quality and also to support more tree planting in the Black Country for this outcome. | | |
| 16 | Worcestershire Regulatory Services (Chris Poole, Senior Technical Officer – Land and Air Quality Team) | <p>Worcestershire Regulatory Services (WRS) undertakes Local Air Quality Management on behalf of Bromsgrove District Council (BDC). An Air Quality Management Area (AQMA) was declared in Hagley in 2010, bordering the LA boundary with Dudley MBC.</p> <p>Due to this proximity, the Respondent considers that future development plans within Dudley MBC have the potential to impact on the Hagley area and WRS, on behalf of BDC, request that Dudley MBC advise and consult Bromsgrove DC Local Planning Authority on any development that could materially impact Hagley AQMA.</p> <p>The Respondent notes that within the appendices of the Black Country AQ SPD that there is reference to an ‘emerging Dudley Borough Development Strategy’ and WRS request that Bromsgrove District Council are consulted on this document, and any other future Dudley MBC Local Plans, when finalised.</p> | <p>Comments Noted.</p> <p>As a neighbouring authority, Bromsgrove District Council are consulted on all Dudley Council Planning Policy Consultations and will continue to be so.</p> <p>Dudley Council publishes weekly lists of registered planning applications on its website.</p> <p>Where it is considered that specific planning applications are likely to have significant effects on neighbouring authorities then such neighbouring authorities would be formally consulted as part of the planning process.</p> | No change required |
| 16 | Worcestershire Regulatory Services (Chris Poole, Senior Technical Officer – Land and Air Quality Team) | The Respondent notes that the draft SPD appears to be a formal adoption of the best practice document ‘West Midlands Good Practice Air Quality Planning Guidance (2014)’ within the existing Black Country Core Strategy 2011. This Planning Guidance is recognised nationally as a good example of best practice and WRS have adopted many of the ideas contained within this guidance and WRS have no adverse comments. | Noted | No Change Required |
| 17 | Yew Tree and Tame Bridge Group (Chairman) | The Respondent is concerned with the Nitrogen Dioxide Exceedences and notes the very obvious risk that this invisible killer has on communities. The health issues are well documented and if not looked at seriously and a proactive campaign is not put in place to sort will result | Noted | No Change Required |

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| | | in many more deaths and associated illnesses. | | |
| 17 | Yew Tree and Tame Bridge Group (Chairman) | The Respondent appreciates the matters around cars, HGV's etc and the ideal to reduce emissions but feel that this is very much a long term goal and the current outcomes need to be addressed quickly. | Noted | No Change Required |
| | Yew Tree and Tame Bridge Group (Chairman) | The Respondent can't understand the need at any time to build any residential dwellings next to any motorways or carriageways where exceedances are known. It is considered that any planning for residential dwellings that fall in areas of recorded exceedances should be barred until such times as the exceedances are controlled reduced and the long term forecast shows further reductions. | <p>The purpose of this SPD is to manage the impact of new development in areas of exceedance through appropriate mitigation measures in order to make such development acceptable in air quality terms.</p> <p>As stated in paragraph 4.7 of the SPD, applications may be refused where mitigation measures cannot make the development sustainable in terms of air quality..</p> <p>As such, it would be considered unnecessary, inappropriate and contrary to the regeneration and growth strategy of the Black Country to barr all new residential development in areas of exceedance.</p> | No Change Required |
| 17 | Yew Tree and Tame Bridge Group (Chairman) | The Respondent suggests that there is very little evidence within the SPD of the use of natural absorbers of the emissions that being of course trees and green spaces. There is a clear need to look at green tree/shrub corridors alongside all parts of the M5 and M6 Motorways that run through our borough. Coupled with areas of sustainable wildflowers. Not only will this help with absorbtion, it will help with noise as well as being | <p>Comments Noted.</p> <p>Agree that reference should be made within the SPD to the benefit that trees and landscaping can provide as a mitigation measure for air quality.</p> | <p>Add a new bullet point under 'All Development' in paragraph 5.7 stating:</p> <p><i>'The provision of trees and landscaping features where appropriate.'</i></p> |

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| | | aesthetically pleasing. | | |
| 17 | Yew Tree and Tame Bridge Group (Chairman) | <p>The Respondent notes that in some areas in Sandwell there are issues around flooding and unstable ground again tree planting as well as being absorbent can help in these areas. Increase the number of trees planted in all of our parks and green and open spaces.</p> <p>There is a greater need now more than ever to look at all initiatives that create cleaner, greener and safer streets and communities. We have a great number of carriageways, A roads and with the support and involvement of the community we should make these greener. We need to protect our trees and green and open spaces and improve for the betterment of us all.</p> <p>The Respondent is not aware that Sandwell has a tree replacement policy and the Respondent suggests that as part of any report on any trees that may need to be removed a full impact assessment be carried out and as part of it a site within the same community be identified for trees to be planted to mitigate any loss.</p> | Sandwell has a tree replacement policy and this is carried out wherever possible. We acknowledge the role that trees can play in helping improve air quality, as long as they are in the right location and the right species of tree. | No change required. |