**Critique of Air Quality proposals in the proposed Local Development Plan – Canterbury District Green Party**

**Summary of key points:**

1. **Current policies to address air quality fail to adequately ensure that air quality in Canterbury will be improved and protect human health.**
2. **The Air Quality Action Plan as written does not consider current DEFRA guidance on the development of such plans nor does it correctly consider guidance on reducing air pollution.**
3. **The Plan and strategy do not take account of relevant government air quality policy in accordance with para 192 of the NPPF.**
4. **Despite air quality being a public health issue, the council failed to involve public health specialists in drawing up the plan and no reference is made in the plan to health at all. The Plan will be sent as part of the consultation which is not in line with current guidance.**
5. **There is no detailed plan re delivery of reductions needed to meet current and future air quality targets and no reference at all to how to achieve standards considered safe for human health by the World Health Organisation or even show how policies align with national government policy on improving air quality. Without clear actionable strategies to reduce emissions from vehicles and other sources of air pollution (including in existing housing, commercial premises etc) reductions in pollution will not be achieved.**
6. **The LDP policies that are specific to air quality (SS4, DS13, DS16, DM13) are reliant on the delivery of other key strategic plans associated with the District Plan such as allocation of development sites and design standards, accessibility etc; the transport plan. Currently these plans do not have reductions in air pollutants as primary objectives and as the LDP states it will be air quality neutral every development site has been assessed as neutral without demonstration of what actions are needed to make such sites air quality neutral. The only actual applied policy relates to new housing not having gas boilers.**
7. **Policy DM13 refers to biomass technology and the need to limit emissions. All biomass plants release small particulate matter which is a hazard to human health and the claim that they can be carbon neutral is not widely supported in the scientific literature. No biomass plants should be allowed in the district.**

The LDP sets out a strategic objective to *Create a transport network with a focus on district-wide public transport and low-carbon travel to improve air quality and people’s health while ensuring excellent access to city and town centres on foot, cycle and by public transport.* In addition, it states that developments will be air quality neutral. The key policies that address these objectives are:

**SS4 - Movement and Transportation Strategy for the district** delivered through a bus led strategy and with new development “… *designed to help improve the air quality of the district as a whole.”*

**DS13 - Movement hierarchy** aimed at minimising additional trips made by private vehicle and contributing to improvements in air quality and carbon emissions

**DS16 - Air quality** developments will need to demonstrate that they are air quality neutral either by design, additional mitigation or provide funding for other mitigation to be undertaken.

**DM13 - Biomass technology** to reduce associated air quality impacts, the biomass technology should be a high-quality low emission plant, and biomass should be locally sourced.

While we welcome the proposed movement hierarchy and ambition of the movement and transportation strategy the actions needed to achieve these are largely the responsibility of other agencies such as the county council, government and bus companies. Delivery of the transport plan is also reliant on meeting building targets to provide relevant developer funding for bus improvements etc.

The Council can influence movement patterns through site selection but stating that any development must be air quality neutral does not mean that any site can be. Given that the council will accept monetary payment where mitigation is not possible for a site it suggests that the council does not expect development sites to be air quality neutral. However, the Sustainability Assessment has assessed every site as neutral rather than identify where sites may not be air quality neutral due to their location. It is clear that sites outside of the city urban area will not be air quality neutral unless cars are banned and there is no need to increase bus journeys to facilitate residents travel requirements. All vehicles will produce particulate matter.

This also does not address the strategic objective of improving the air quality of the district as a whole nor do the policies consider national policy to reduce air pollution. The Air Quality Action Plan highlights that in Canterbury current emission levels are above or close to current national limits. In Wincheap for example, a 16.4% reduction in roadside emissions is required just to bring levels to current NO2 limits. No reference is made to the fact that traffic levels are increasing (4% since 2018) nor that development arising from the last LDP is likely to increase traffic volumes over the next few years. The slow down in purchasing of electric vehicles and increasing purchase of larger SUV vehicles means that little benefit from changing vehicle mix will lead to such improvements in air quality. Potentially just to keep to current limit will require 30% + reductions in traffic.,

In addition, government policy is to reduce pollution levels and it is likely that within the timeframe of the LDP upper limits will be reduced. No reference has been made to these targets in the air Quality Action Plan. In particular particulates limits are of key concern and while not part of the air quality management framework local authorities are expected to address local levels. In relation to particulate matter, Policy DM13 should be redrafted to ban all biomass plants as biomass plants release small particulate matter which is a hazard to human health and the claim that they can be carbon neutral is not widely supported in the scientific literature.

The LDP states that the strategy regarding air quality is to protect people’s health. However, there are no policies that are designed to reduce air quality to accepted levels of air pollution considered protective of human health. Currently World Health Organisation limits are seen as best practice which would require PM2.5 to be reduced to less than half current levels and NO2 to be reduced to a quarter of current limits. This would require a 78.5% reduction on current levels.

Proposals in the LDP and the current Air Quality Action Plan do not provide assurance that LDP objective of being air quality neutral can, or will be achieved. More significantly the outlined proposals when considered in terms of deliverability of the plan, even if achieved, will not protect human health.

It is also clear that the LDP and air quality action plan have not been drawn up in accordance with government guidance or policy. To meet government policy set out in the national, air quality action plan and DEFRA 2023 *Air Quality Strategy Framework for local authority delivery* the Plan and Strategy should at a minimum support the achievement of achieving a maximum Annual Mean Concentration Target (AMCT) of 10 micrograms of PM2.5 or below per cubic metre (µg/m3) and reduce population exposure to PM2.5 by 35% compared to 2018 levels by 2040 (DEFRA Environmental Improvement Plan 2023 (EIP)). In addition, the Government has set interim targets to be achieved by 2028:

* The highest annual mean concentration in the most recent full calendar year must not exceed 12 µg/m3 of PM2.5.
* Compared to 2018, the reduction in population exposure to PM2.5 in the most recent full calendar year must be 22% or greater with an average 35% reduction by 2040.

Para 192 of the National Planning Policy Framework states that *Planning policies and decisions should sustain and contribute towards* ***compliance with relevant limit values or national objectives*** *for pollutants*. In the preparation of Air Quality Action Plans government guidance states that “*All English local authorities (including county councils), the Environment Agency, and designated relevant public authorities, must have regard to this [ Air Quality] strategy when exercising functions of a public nature that could affect the quality of air.* (DEFRA 2023 Air Quality Strategy Framework for local authority delivery (AQSF)). The AQSF goes on to state that *while PM2.5 is not currently part of the Local Air Quality Management framework, the government still expects all local authorities to effectively use their powers to reduce PM2.5 emissions from the sources which are within their control. (p20)* and that *All local authorities should support the delivery of national PM2.5 targets by taking action to reduce emissions from sources within their control.*

The current Plan and strategy fail to comply with government guidance as such are not sound. In addition, in the preparation of the Plan and air quality strategy the council has not sought public health involvement as recommended by DEFRA nor modelled the impact of their proposals on air quality. The Council appears to have taken an approach that simply because they state that the Plan will be air quality neutral all developments and actions will therefore be neutral without providing any evidence or modelling to underpin such an assertion.