

Air Quality and Planning in Local Authorities

June 2014



01 Introduction

What is this about?

Key points to remember

02 Setting the scene

Who responded?

Who's paying for what?

What guidance is available?

03 What needs to change

Where should guidance come from?

How to improve guidance

Challenges of meeting objectives

Identified challenges

What do Local Authorities need?

04 Looking to the future

What are the main challenges?

What is the IES going to do?

Recommendations



Introduction

01

88%

of the EU urban population were exposed to pollutant concentrations in excess of WHO guidelines in 2011

In the UK Local Authorities have a statutory responsibility for the management of local air quality, including the requirement to regularly review and assess ambient air quality standards and objectives as prescribed by national regulation. Many guidelines and tools have been developed to promote best practice in the way these responsibilities are carried out. However, the type and severity of air quality issues varies widely across the UK.

Likewise, the lack of resources and expertise available to those who work in Local Authorities makes air quality and planning considerations a high concern. This responsibility is under review, with the Government initially indicating a preference for removing local authority duties altogether.

IES members working for Local Authorities have expressed concern that air quality is not considered during development planning. In 2013 the IES sent a survey to every UK Local Authority. This report summarises those responses. This report follows the [Air quality and Planning law](#) technical note published by the IES in 2013, 129 responses were received from Local Authorities across Britain.

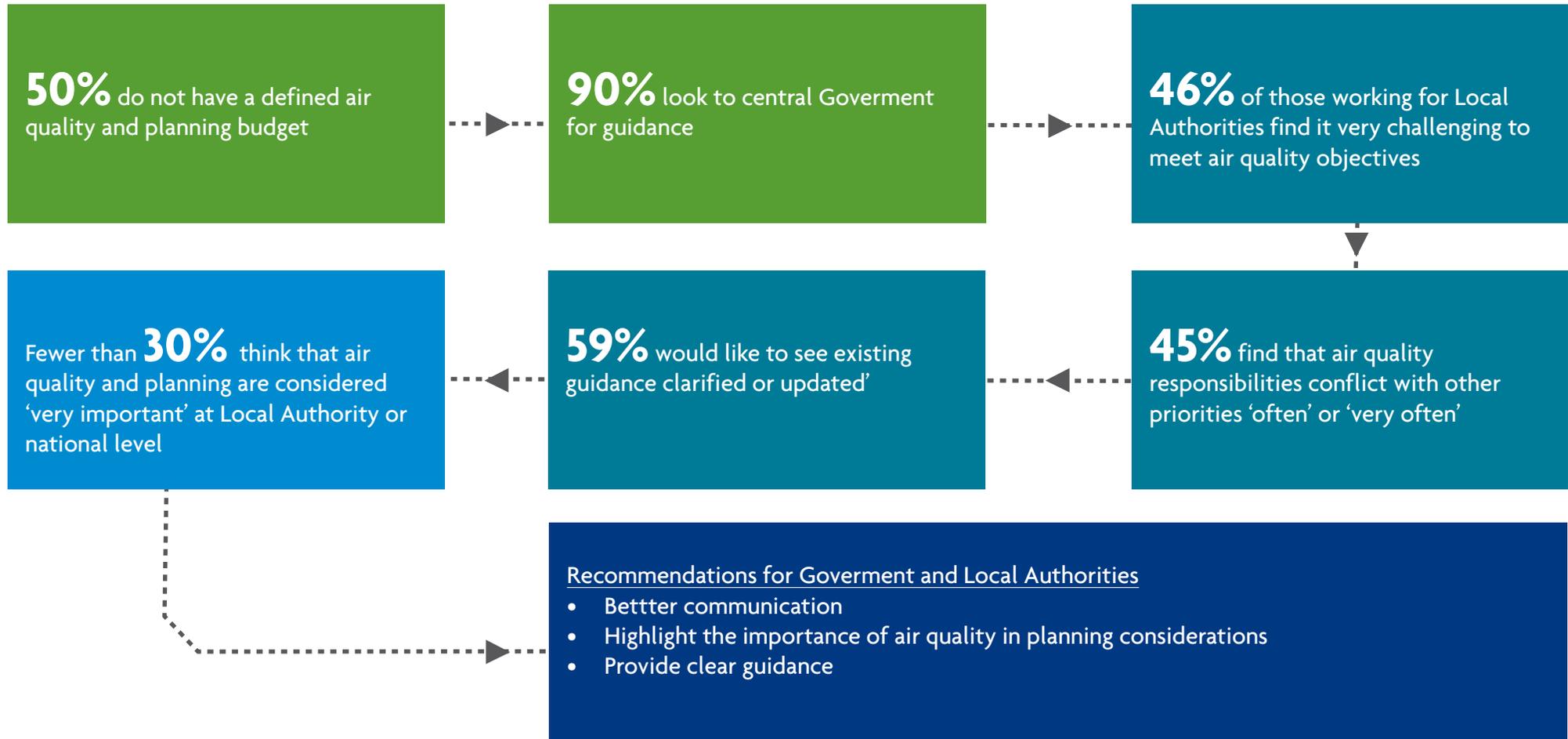
The European Dimension

The recent [EEA report](#) on air quality and highlights the effects that poor air quality can have on human health, reiterating the importance of meeting air quality targets set at EU level.

05

Key points to remember

The survey found that:





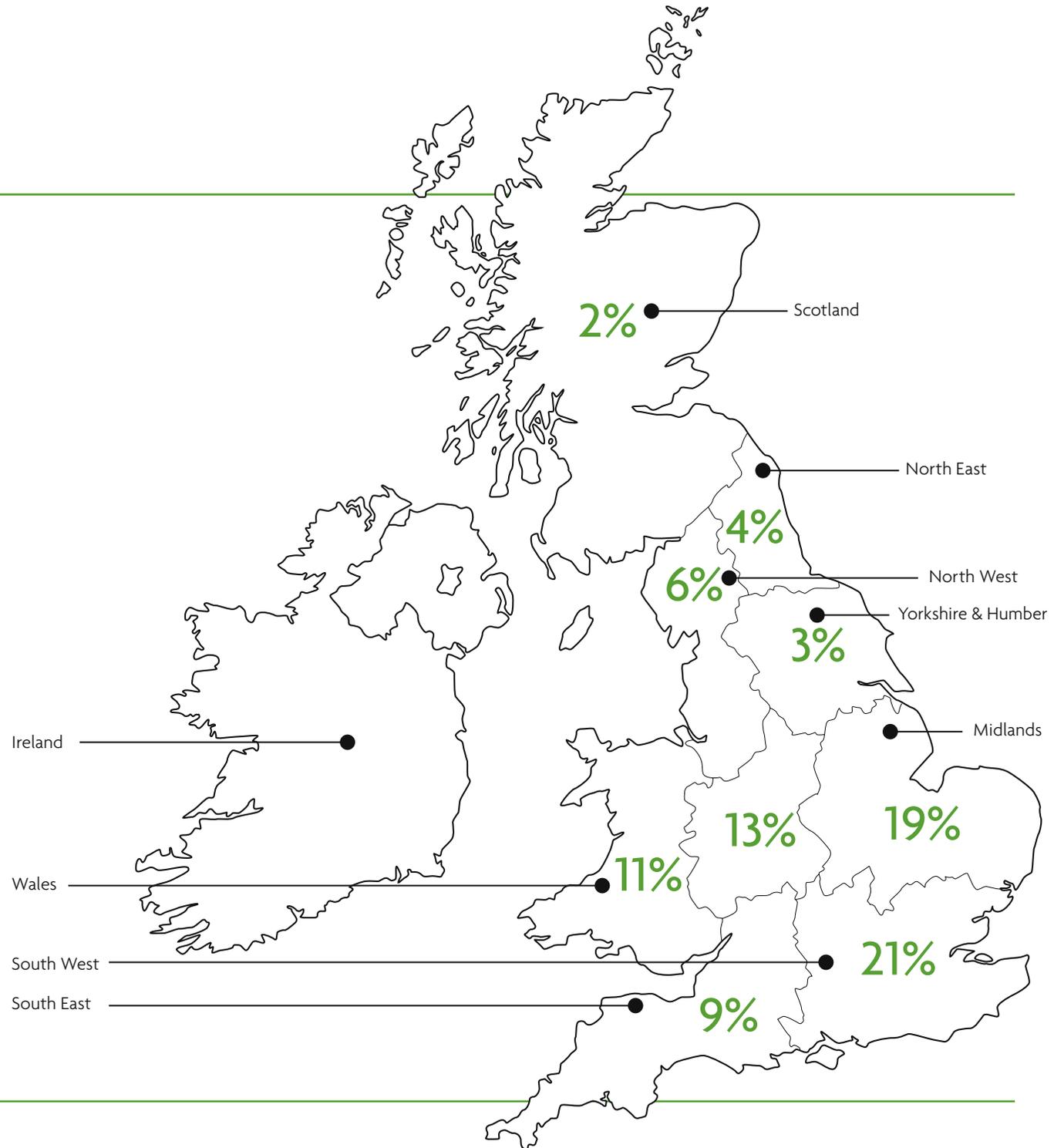
Setting the scene

02

07

Responded

Survey respondents predominantly worked in air quality, management or strategy roles. Only **21%** of respondents work on air quality and planning considerations 61-100% of the time Air quality was cited as a primary job for **75%** of respondents.

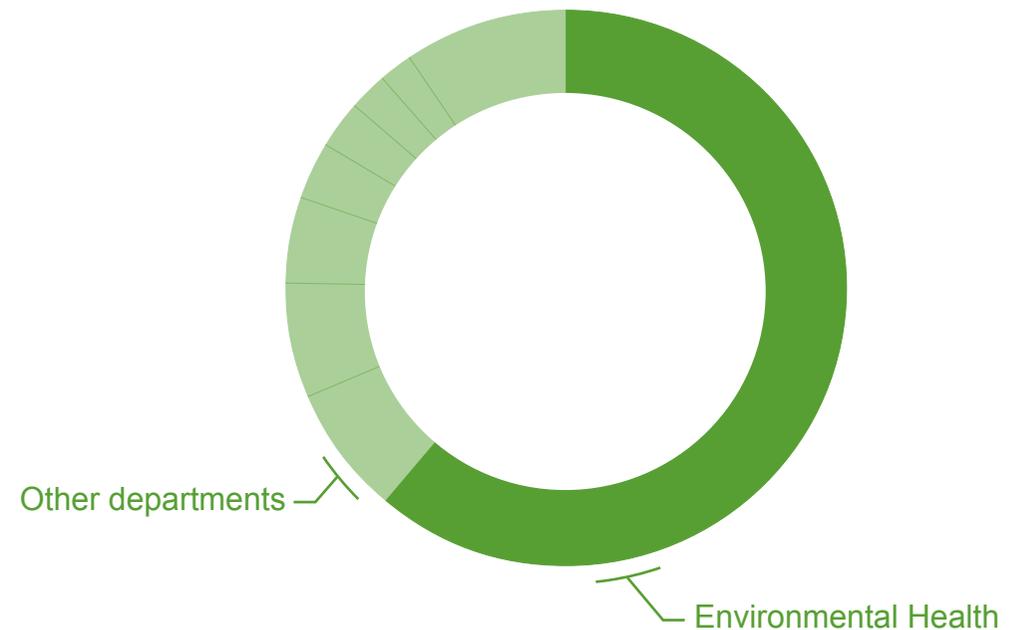


Who's paying for what?

To understand concerns about how air quality is considered in planning decisions it is necessary to examine resourcing within Local Authorities.

Overwhelmingly, Local Authority decisions on air quality and planning matters are made in the Environmental Health department. The fact that decision-making processes are not uniform across authorities could go some way to explaining why there are perceived problems.

50% do not have access to a set budget
10% do not have access to any resources, financial or otherwise



Which department are air quality and planning decisions taken in?

09

What guidance is available?

All respondents use some form of guidance to help deliver air quality objectives. Almost 90% look to central Government and over 60% to professional bodies for the guidance they need.

Air quality is alluded to in Local Authority planning guidance for over 70% of respondents. Technical guidance specifically addressing air quality is provided less frequently.

How useful is the currently available guidance?

Central Government policy and guidance



Local Authority policy and guidance



Other policy and guidance (e.g. from NGOs/or professional bodies etc)





What needs to change?

03

Where should guidance come from?

The survey divided guidance into three categories, but recommendations were similar for all sources. The most common requests and suggestions focused on highlighting the importance of air quality within the planning community as well as providing examples of best practice.



Suggestions from the survey on how to improve guidance are categorised in this section.

Respondents were clear about what level of guidance should be provided and by whom.

The role of guidance from different authoritative sources

Central Government: should be overarching, interpret Government policy and legislation for guidance users outline the statutory responsibilities of local authorities and provide examples of policy language that can be used by Local Authorities

NGO or Professional body guidance: should be technical and must include factors such as: significance criteria, w for action, cumulative impacts and mitigation measures

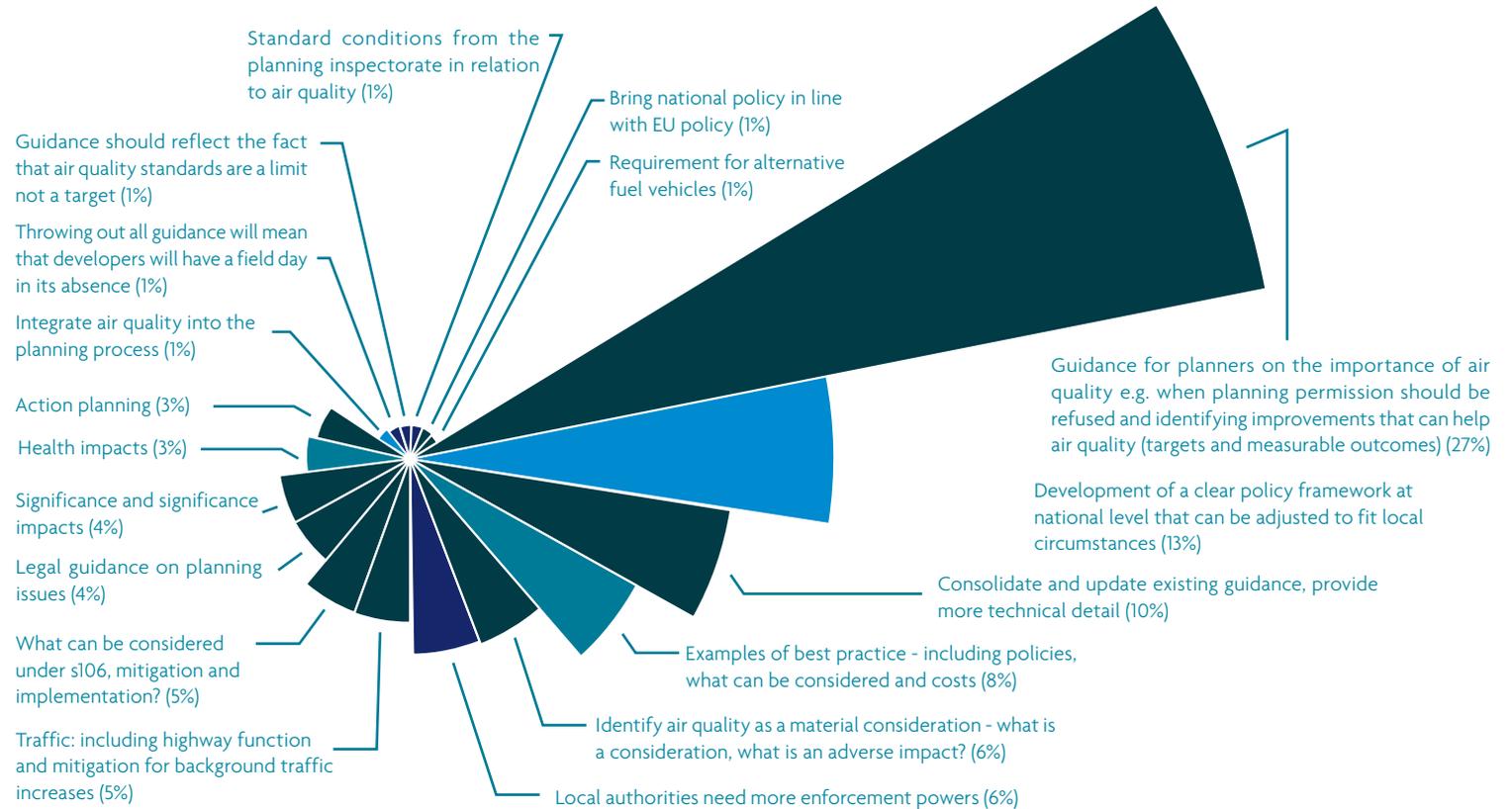
Local Authority guidance: must have sufficient weight to allow local authority officers to delay developments where necessary to ensure air quality is appropriately considered

How to improve guidance

Central Government guidance

Government guidance is expected to be overarching, provide interpretation of legislation and have example policy wording.

Respondents gave qualitative suggestions on how to improve central Government guidance. We have grouped similar responses together to show their frequency.

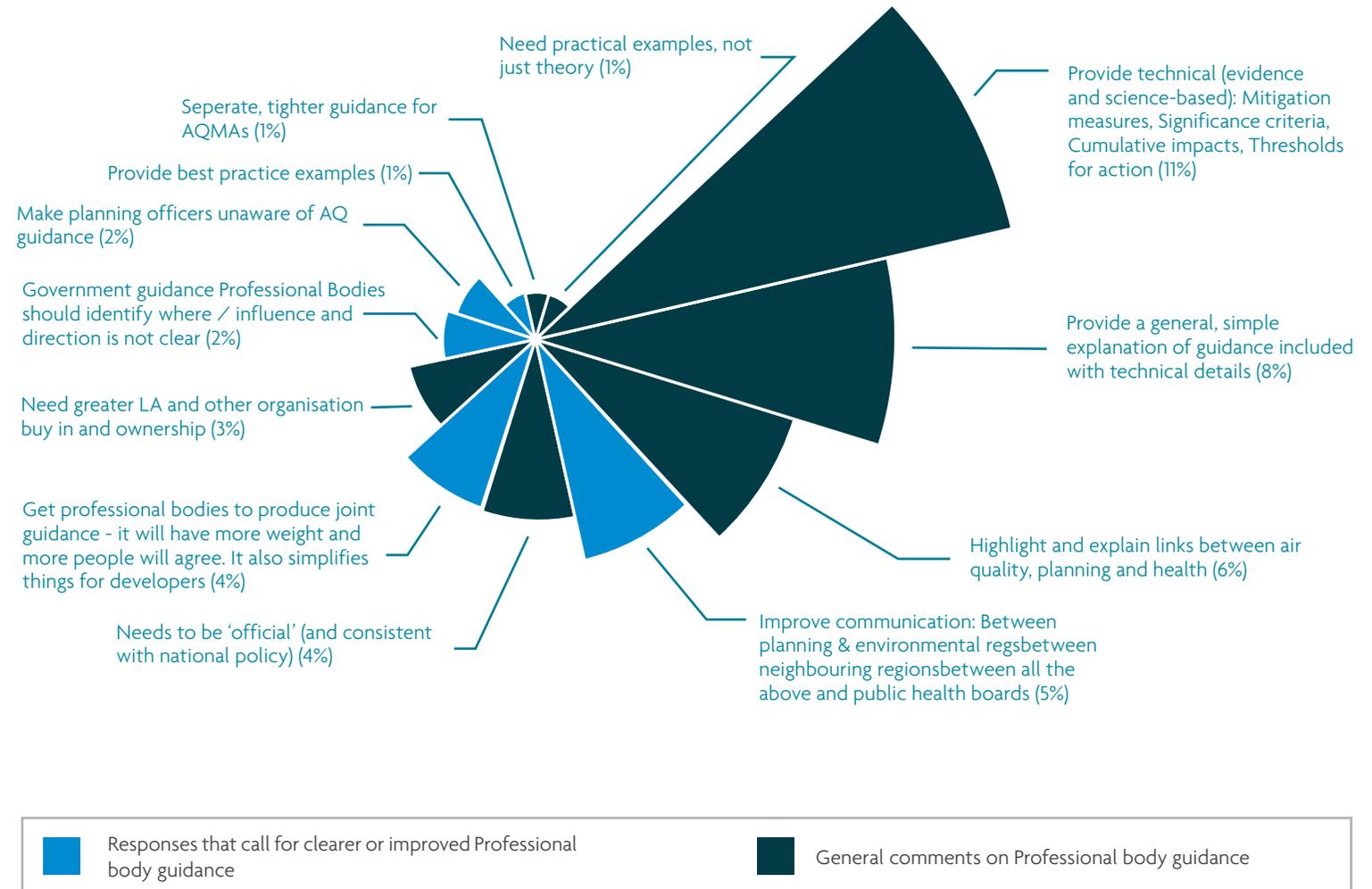


How to improve guidance

Professional body guidance

Those working for Local Authorities look to Professional Bodies and NGOs for more technical guidance.

Respondents gave qualitative suggestions on how to improve professional body guidance.

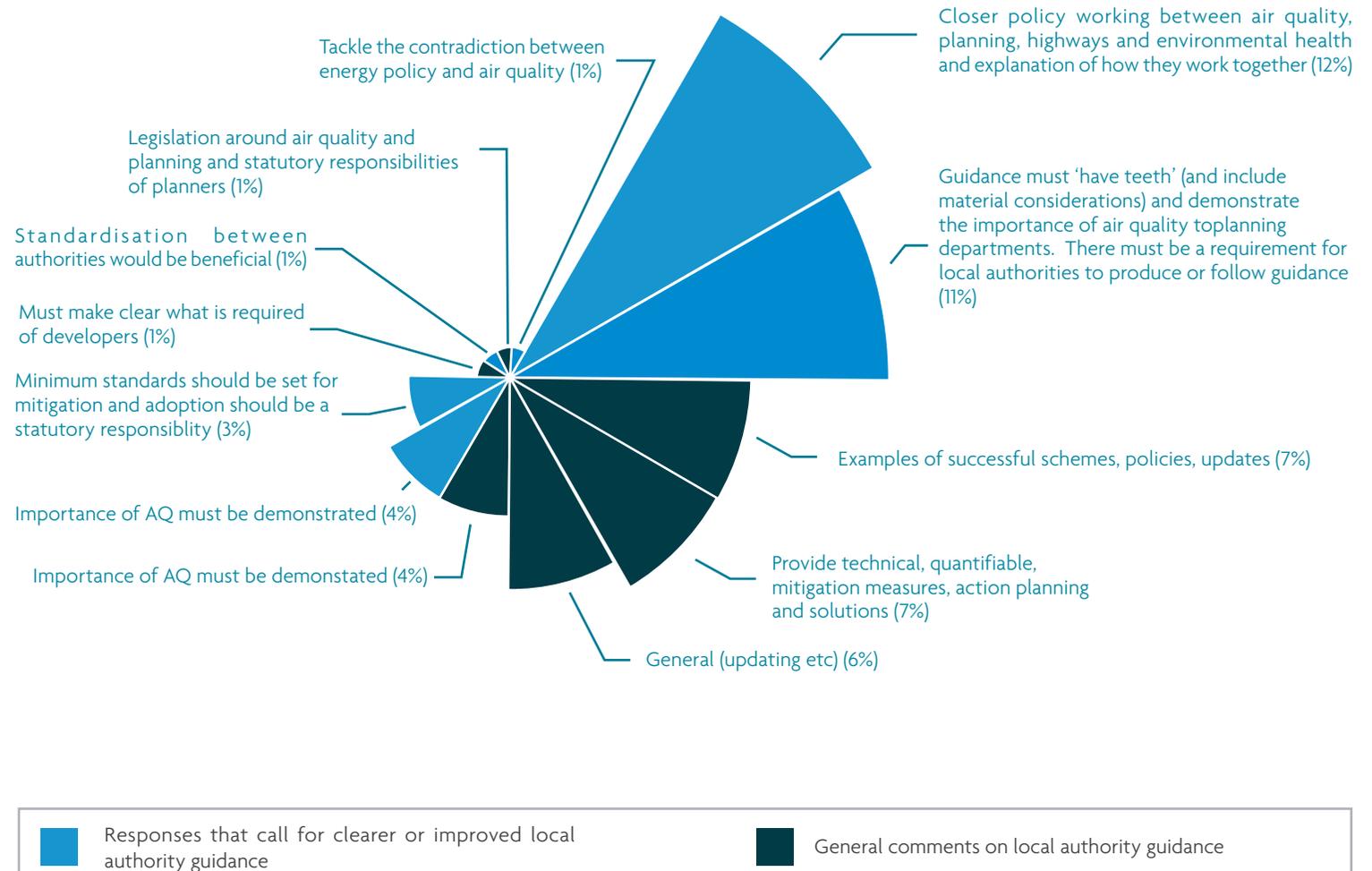


How to improve guidance

Local Authority guidance

The survey recommended that Local Authorities should be for producing guidance that Local Authority officers could use in dissuasion with developers. This would strengthen the argument of those officers.

Respondents gave qualitative suggestions on how to improve Local Authority guidance.

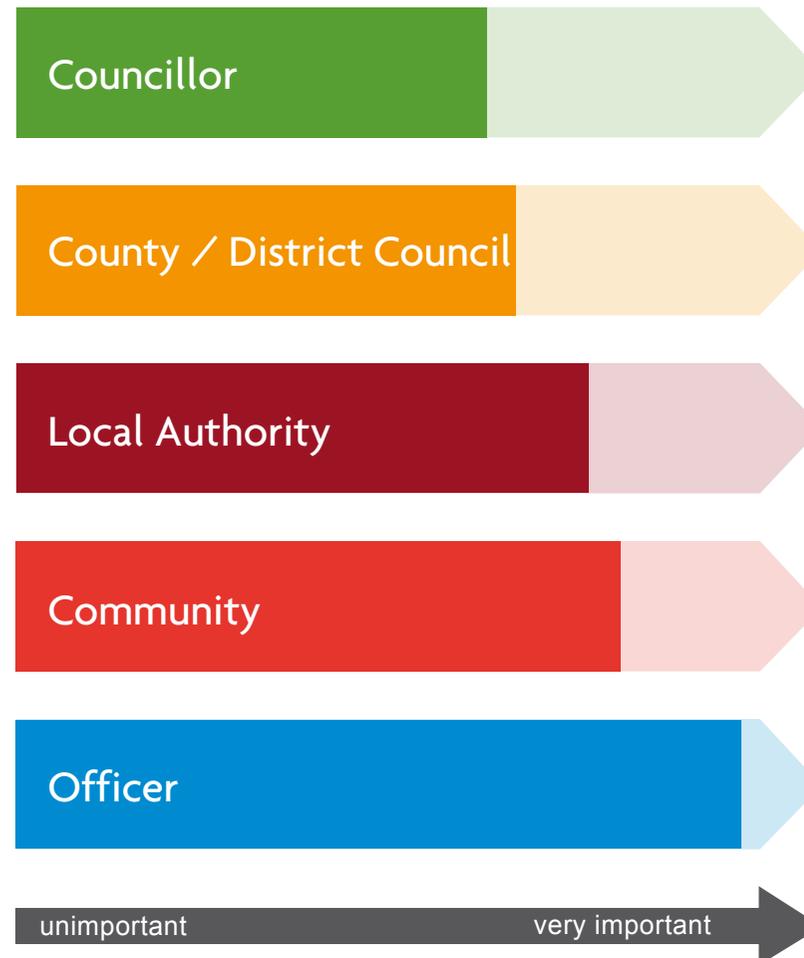


Challenges of meeting objectives

We may gain some insights into the challenges of meeting air quality objectives by exploring the perceived importance of air quality at different levels within local authorities.

The results suggest that perceived importance of air quality is greatest at officer level and reduces until you reach councillor level. This suggests that the importance of air quality concerns is not being sufficiently communicated to those further up the hierarchy.

How important is air quality in planning considered at these levels ?



17

Identified challenges

46% of those working for Local Authorities find it very challenging to meet air quality objectives.

45% find that their air quality responsibilities conflict with other Local Authority priorities 'often' or 'very often'.

5% say conflict happens 'all the time'

The most commonly-identified challenges



2%

Cumulative impacts of small emissions sources none are of which individually categorised as posing a risk



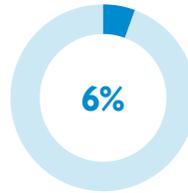
2%

Inability to change behaviour e.g. travel



5%

The Defra LAQM review



6%

Lack of knowledge, expertise or powers of enforcement within the Local Authority



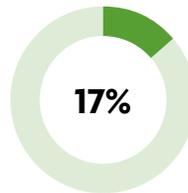
9%

Lack of interest within Government



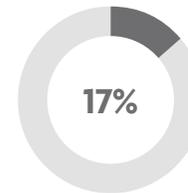
11%

Lack of recognition of air quality as a serious concern (especially with respect to health)



17%

Balancing the agenda of air quality with the need for infrastructure, transport, and growth



17%

Pollution sources outside of Local Authority control – e.g. roads under Highways Agency jurisdiction

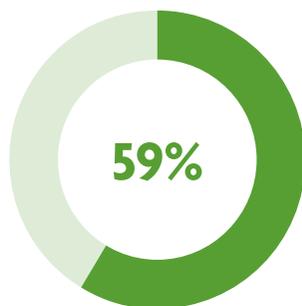


35%

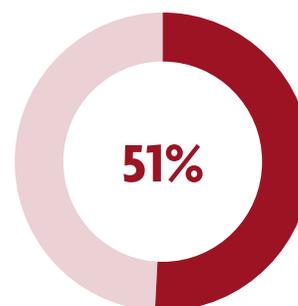
Lack of available resources (financial / human)

What do Local Authorities need?

Although additional time and training are commonly identified as needs for Local Authorities, the most common request was for clearer or updated existing guidance. This indicates that Local Authorities need more support from Central Government and Professional Bodies in particular.



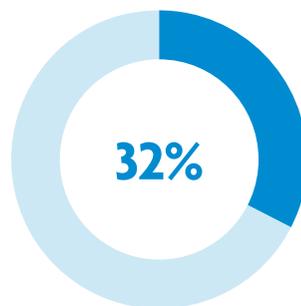
Clearer or updated guidance



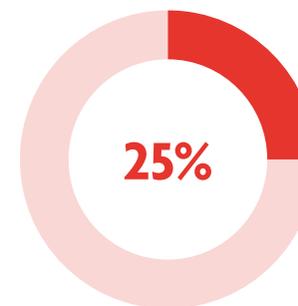
Additional staff time



More or better training



Networking with other local authorities



Additional guidance



Looking to the future

04

What are the main challenges?

The challenges identified by respondents vary in their complexity but there are some problems that can be addressed directly by the IES.

The aim of this report is to help those in Local Authorities who work on air quality and planning concerns.



Planners not considering air quality

There are a great number of studies that investigate the ill effects of air quality; including those that link poor air quality to the exacerbation of respiratory diseases such as asthma.

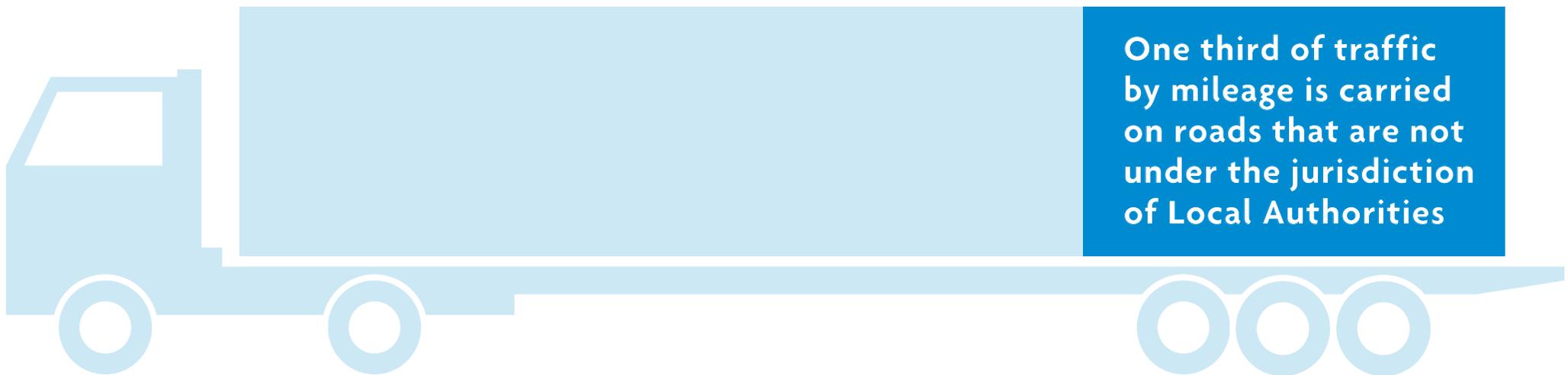
This information is not in a format that is useful to Local Authority officers. Therefore the IES will create a short briefing document for use by Local Authority Officers to demonstrate the importance of considering air quality in planning decisions.

“health effects can occur at air pollutions lower than those used to establish the 2005 [WHO] guidelines”

EEA Report 2012

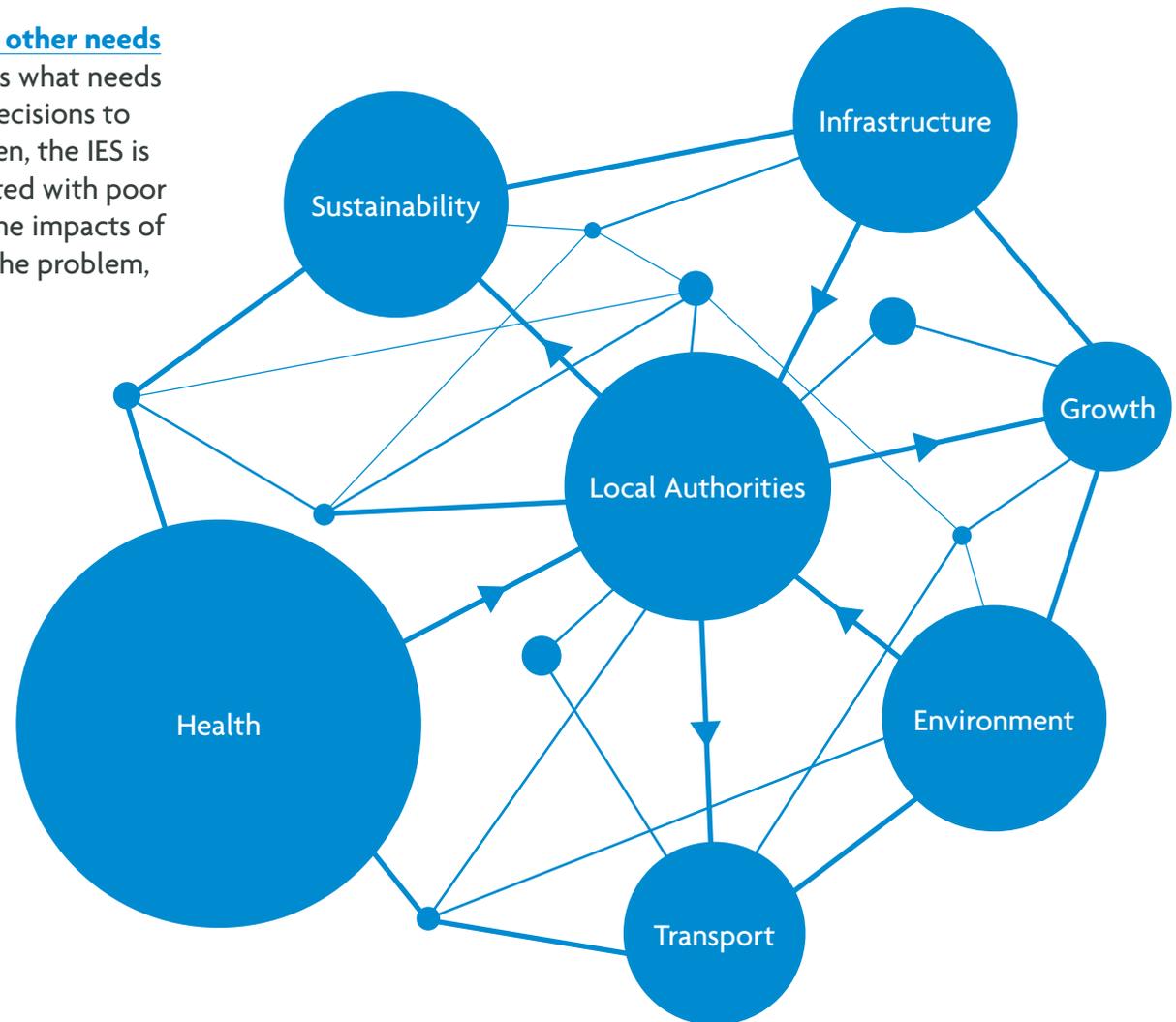
Pollution sources outside of Local Authority control

Major roads under the jurisdiction of the Highways Agency were the source most frequently cited by respondents. There is Highways Agency guidance on the assessment of the impact road projects may have on local regional air quality. This includes a calculation method to estimate local pollutant concentrations and regional emissions for air including those for carbon. However this guidance was most recently updated in 2007, prior to the 2008 EU Directive on Air Quality and therefore needs to be revised in line with current national and international legislation.



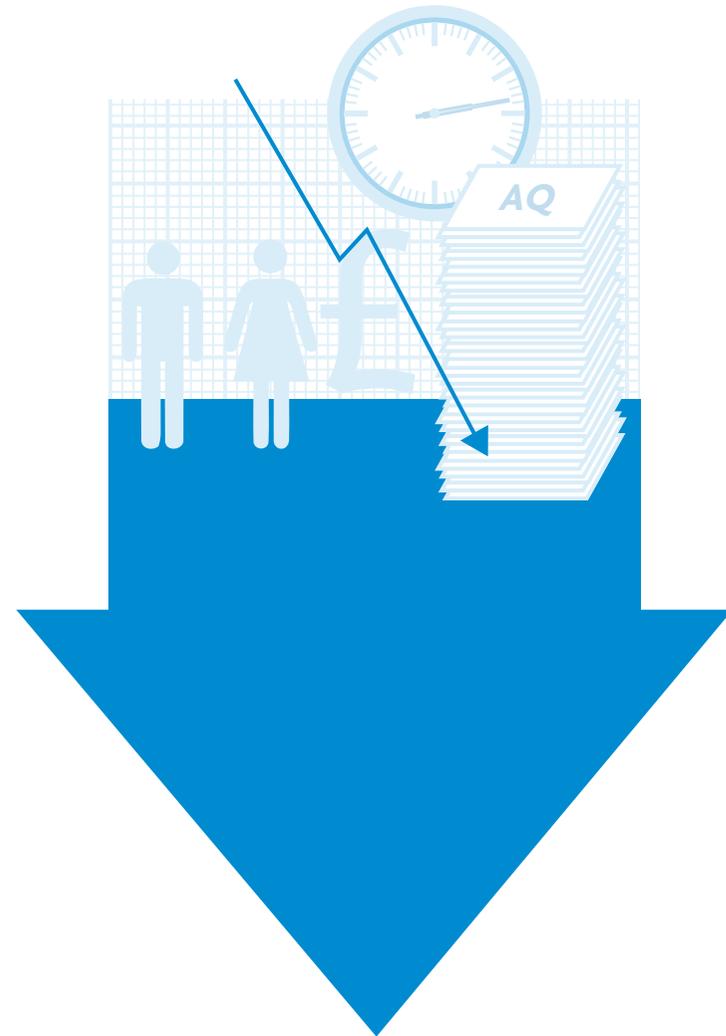
Difficulties in balancing conflicting agenda of air quality with the other needs

It is clear that communication within Local Authority departments is what needs to be most improved for the importance of air quality in planning decisions to be adequately recognised. Where planning decisions need to be taken, the IES is able to provide technical guidance, information on the risks associated with poor air quality and collectives of test practice in the area. Evidence on the impacts of poor air quality, and the contribution of planning to responding to the problem, will help planners make their case locally and rationally.



Lack of available resources

Though identified as the greatest challenge facing Local Authorities, the IES is unable to tackle lack of resources directly. We are however able to provide technical guidance, information on the risks associated with poor air quality and collections of best practice in this area. Evidence on the impacts of poor air quality, and the contribution of planning to responding to the problem, will help planners make their case locally and nationally.



Government

- Give Local Authorities the power to prevent developments if they will have a negative impact on air quality.
- Produce clearer or updated guidance for planners on the importance of air quality
- Produce best-practice examples of policies that can be used by Local Authorities
- Acknowledge the importance of the health impacts of poor air quality
- Bring the Department of Health, Highways Agency, Defra and Department for Communities and Local Government to consult and work together on air quality and health issues.

Local Authorities

- Produce guidance that allows Local Authority offices to ensure air quality is appropriately considered
- Tackle the contradiction between air quality and low-carbon energy policies
- Demonstrate the importance of air quality in planning matters
- Promote closer working between air quality, planning, environmental health and the Highways Agency.
- Make clear what is required of developers when considering air quality implications

The IES will continue engaging with Central and Local Government to promote greater collaboration between air quality and planning professionals, This report is the first step in the process.



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