

PLANNING ADVICE NOTE – AIR

March 2017

Introduction

The purpose of this and other Advice Notes in the series is to help Parish Councils to respond to development proposals constructively with the aim of maximising the environmental benefits while minimising or, ideally, avoiding harm. Not all development proposals are acceptable even with amendments, though many can be made acceptable and more beneficial.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution.

National Planning Practice Guidance

The Government's online Practice Guidance¹ can assist with the balance between protecting environmentally important sites and species and encouraging economic development; it provides links to advice on NIAs.

At the time of writing (March 2017), updated guidance on the law affecting European sites, protected species and Sites of Special Scientific Interest is being prepared by Defra and will replace the advice set out in *Circular 06/05: biodiversity and geological conservation*.

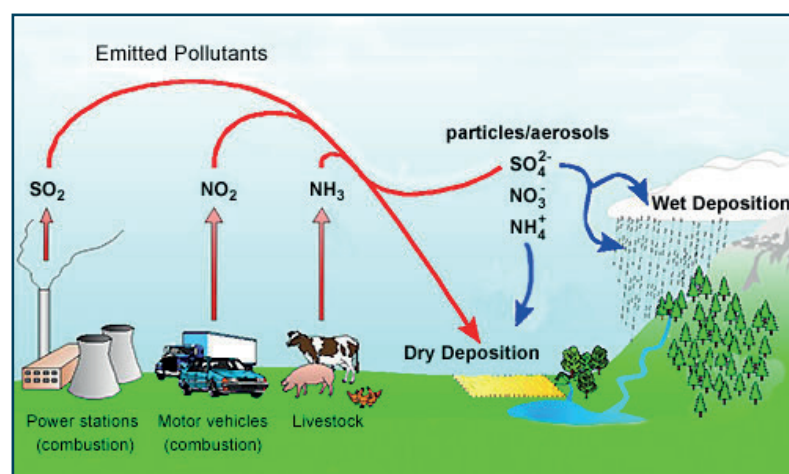
The importance of avoiding air pollution

The threat posed to human health by air pollution is widely acknowledged. A report published by the Royal College of Physicians and Royal College of Paediatrics and Child Health in February 2016² starkly sets out the dangerous impact air pollution is having on our nation's health. Each year in the UK, around 40,000 deaths are attributable to exposure to outdoor air pollution, which plays a role in many of the major health challenges of our day. It has been linked to cancer, asthma, stroke and heart disease, diabetes, obesity, and changes linked to dementia. The health problems resulting from exposure to air pollution have a high cost to people who suffer from illness and premature death, to our health services and to business.

Each Year in the UK, around 40,000 premature deaths are attributable to exposure to outdoor air pollution.

¹ <https://www.gov.uk/guidance/natural-environment#local-ecological-networks>

² Every breath we take: the lifelong impact of air pollution. See full report at: <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>



From: www.apis.ac.uk/starters-guide-air-pollution-and-pollution-sources

Wildlife and its habitat can also be harmed by air pollution³. Concerns about acidifying pollutants arise as the deposition of acidifying species can have adverse effects on buildings and vegetation, as well as acidifying streams and lakes and damaging the aquatic environment. Eutrophying⁴ pollutants enrich soils or rivers and lakes through rain with higher levels of nitrogen, thereby disturbing the natural balance of nutrient levels and diversity of species in sensitive environments. High concentrations of air pollutants are known to be harmful to the environment as well as human health.

Agriculture is the dominant source of ammonia emissions, with emissions from livestock production and their wastes comprising two-thirds of the total emission. These emissions derive mainly from the decomposition of urea in animal wastes and uric acid in poultry wastes⁵. The Inventory of Ammonia Emissions from UK Agriculture 2015⁶ noted that ammonia emissions from agriculture have decreased by 19% over the time period 1990-2015, largely due to declining livestock numbers, though the 2015 figure was higher than that for 2014. Floating covers (e.g. expanded clay granules) on cattle slurry lagoons reduce emissions by 60% and tight lid, roof or tent structures reduce emissions by 80%⁷. There are a number of potential mitigation options for pig housing: for example, a partly slatted floor with reduced pit area (30% reduction), and acid air scrubbing techniques (80% reduction)⁸.

Shropshire Core Strategy⁹

Among other things, the Core Strategy (adopted 2011) emphasises the need to plan for a lower carbon footprint, ensuring development mitigates and adapts to the effects of climate change; the protection and enhancement of our natural and historic environment, its character, quality and diversity; and access to new and improved facilities and services including cultural, leisure and sport. It highlights the importance of environmental networks – environmental assets and their connections – which can provide multifunctional benefits including maintaining air quality. It also states (para 4.74) that, whilst the Core Strategy aims to provide general support for the land-based sector, larger scale agricultural

development, including livestock production units and poultry units, can have significant impacts and will not be appropriate in all rural locations.

Relevant policies include Countryside and Green Belt (Policy CS5); Sustainable Design and Development Principles (Policy CS6); and Environmental networks (Policy CS17).

High concentrations of air pollutants are known to be harmful to the environment as well as human health.

³ See for example the National Atmospheric Emissions Inventory (NAEI), <http://naei.defra.gov.uk/overview/ap-overview>

⁴ The Defra Code (2009) Protecting our Water, Soil and Air: A Code of Good Agricultural Practice for farmers, growers and land managers (para 20) defines eutrophication as “the enrichment of ecosystems by nitrogen or phosphorus. In water it causes algae and higher forms of plant life to grow too fast. This disturbs the balance of organisms present in the water and the quality of the water concerned. On land, it can stimulate the growth of certain plants which then become dominant so that the natural diversity is lost.”

⁵ Source: NAEI

⁶ TH Misselbrook, SL Gilhespy, LM Cardenas, J Williams, U Dragosits (2016) Inventory of Ammonia Emissions from UK Agriculture 2015

⁷ Bittman et al., 2014

⁸ Bittman et al., 2014

⁹ For applications in Cheshire, see our supplementary sheet: Planning Policies in Cheshire

Shropshire SAMDev

The Site Allocations and Management of Development (SAMDev) development plan document adopted in December 2015 features detailed policies and site allocations within the framework set by the Core Strategy. The SAMDev acknowledges landscape-scale initiatives including the NIA and states that new strategic infrastructure proposals will be assessed by reference to air quality among other things (policy MD8), as will proposed waste management facilities (MD14).

How can the Parish Council help to safeguard its environment and community?

The Parish/Town Council can help, when responding to consultations about development proposals (whether initiated by the developer or by the LPA), by:

- Where appropriate, encouraging the preparation of ambitious Travel Plans intended to facilitate sustainable transport modes, to include targets for reduction in the level of car use and a monitoring framework, with wider community benefits;
- Seeking to ensure that development generally will be served by sustainable transport modes, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport;
- Seeking ways of ensuring that where possible construction of buildings will provide high levels of thermal insulation, lessening energy requirements;
- Looking for evidence that agricultural development will be consistent with Government guidance on minimising atmospheric emissions¹⁰, and asking applicants for livestock buildings to show how they will minimise ammonia emissions;
- Encouraging development solutions such as covers over slurry lagoons that can reduce ammonia emissions;
- Considering the potential for emission of particulates when commenting on proposals for commercial plants burning biofuels;
- Encouraging woodland buffer planting down-wind of poultry plants or other sources of ammonia, because (among other benefits) it can absorb atmospheric ammonia;
- Bearing in mind that compact mixed-use developments (residential, educational, leisure and business) can reduce the need for travel;
- Where appropriate, seeking the imposition of a construction traffic management plan, with approved access route for HGVs, and a requirement that machinery be throttled down or switched off when not in use; and
- Where appropriate, seeking rigorous pre- and post-development monitoring to ensure that conditions and limitations are properly observed; and
- Seeking to ensure that best available technology is used to minimise the risk of pollution.

¹⁰ Defra (2009) Protecting our Water, Soil and Air: A Code of Good Agricultural Practice for farmers, growers and land managers; see especially paras 25-33.