



Air Quality Supplementary Planning Document (SPD)

January 2020

Consultation Statement for the Air Quality Supplementary Planning Document (SPD)

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1. Introduction

This statement sets out the work involved in preparing the SPD and how the Council has involved the community and various stakeholders in preparing the Air Quality SPD.

In line with Regulation 12 of the Town and Country Planning (Local Planning) (England) 2012 regulations and with Wycombe Revised Statement of Community Involvement (July 2018), this statement provides details of:

- (i) the persons the local planning authority consulted when preparing the supplementary planning document;
- (ii) a summary of the main issues raised by those persons; and
- (iii) how those issues have been addressed in the supplementary planning document

After the consultation on the draft SPD, this consultation statement will be updated to reflect the feedback received and how this has been taken into account into the final version of the SPD. The final consultation statement will be published alongside the SPD for adoption.

2. SPD preparation and early stakeholder and community engagement

SPD Preparation

What was done?

The Wycombe District Local Plan was adopted on 19 August 2019. This Supplementary Planning Document (SPD) supplements policies CP12, DM33 from the Local Plan and DM2 from the Delivery and Site Allocations Plan, providing detailed guidance to assist applicants in meeting air quality requirements of development.

This SPD, once adopted, will form a material consideration when determining planning applications. It covers all types of development and sets out where further assessment or mitigation is required in the context of locally declared Air Quality Management Areas (AQMAs) and the Council's Air Quality Action Plan (AQAP).

Early preparation on the SPD drew together advice and expertise from the main internal stakeholders in the process, that is, Control of Pollution specialists from the Environment team within WDC and the manager of Development Management. Working together and drawing on most recent best practice at Coventry and other authorities, we agreed an overall approach.

This approach was tested at the regular meeting of the Agents' panel on 5 November 2019. A number of issues were raised: these issues and the response to them is set out below.

We also arranged a workshop with the Planning Community Panel on 20 November 2019. We gathered useful feedback and questions and the response to these is set out below.

Section 3 sets out in more detail who we consulted on the draft proposals for the SPD and how we did this.

Section 4 sets out the main issues raised during the SPD preparation and how we have taken these into account when preparing the draft SPD for consultation.

3. Who and how did we consult when preparing the supplementary planning document

The Agents' panel consists of local agents with an interest in planning in the Wycombe area, and the Council arranges regular meetings with them three times a year. Discussion of the Air Quality SPD was included in the agenda for their meeting on 4 November 2020, which nine agents attended. Notification of this agenda topic was advertised to the panel on 22 October 2019.

We invited the Planning Community Panel to a workshop at the Council on 20 November 2019. The Community Panel is made up of local representatives and stakeholders. Attendance was supplemented by stakeholders who had previously been engaged in the process of developing the Council's Air Quality Action Plan, which was adopted by the Council in 2018. Nine people attended, representing:

- Marlow Society
- Chiltern Society
- Transition Town Marlow
- Flackwell Heath Residents' Association and Chepping Wycombe Parish Council
- Risborough Council of Churches
- Wycombe Friends of the Earth
- High Wycombe Society

4. Summary of the main issues

Summary of the main issues raised by stakeholders during the preparation of this draft SPD, and how those issues have been addressed in the supplementary planning document.

Agents panel

Main issue	Council response
What happens elsewhere in Bucks to AQMA areas? What about AVDC – scope to join up?	WDC is ahead of other councils in Bucks in adopting an AQAP, and in preparing an Air Quality SPD. This SPD could become a template for the whole county after the unitary Buckinghamshire Council has been established in April 2020.
Consider including the big employment areas such as Booker Airpark and Wooburn/Loudwater?	The guidance will also apply to commercial development, both major and minor.
Other councils e.g. Reading don't ask for an assessment for minor applications if certain design features are included.	We have taken this on board and have set out minimum requirements for minor development both in general and within the AQMAs. Preparation of an assessment is optional if a different requirement is sought.
The panel sought clarity as to exactly what bar development has to pass? No more people being introduced into AQMA?	The guidance will set out the method of assessment, what constitutes 'damage' and how the damage costs are arrived at. Where more people (receptors) are introduced into the AQMA, then appropriate mitigation will be required.
The panel asked to understand the data – how bad is the problem?	The Council's website sets out more detail on the air quality issues and the pollution levels in the AQMAs.
How will it apply to replacement dwellings?	Replacement dwellings are currently not included.
Having to commission an expensive report in advance of submission is an issue; it is too demanding /another cost on development	See above – an assessment will only be required for major development.
What do you do if no mitigation is possible?	If the proposal cannot be amended to make it acceptable, then refusal of planning permission will be considered.
It was asserted that developers can't get the car charging points connected. Grid has no capacity to cope with charging points –will we consult electricity providers?	The Council cannot find any firm evidence that electricity providers prevent connection to the grid. Charging point connection, and grid usage, is unlikely to spike unpredictably but gradually rise as EV charging points are introduced: it is the responsibility of the electricity

Main issue	Council response
	providers to anticipate, and plan for, extra demand.
Could they just put the cable in (and not provide the hook-up point)?	Charging infrastructure between the development and the public supply will be required as a minimum on a private charging point. The provision of visible hook-up points is key factor in encouraging behaviour change.
What is the spec? Is it superfast?	The guidance sets out the specification for the charging infrastructure.
Will AQMAs be reviewed?	The Council monitors air quality on an ongoing basis, particularly within AQMAs. This is reported annually and the reports are available on the Council's website. The Council may add or rescind AQMAs according to what the monitoring is showing.

Community panel

Main issue	Council response
More charging infrastructure is needed to allow / encourage uptake of electric vehicles, not only in new development.	The SPD will require development in the affected urban areas to provide EV charging points. The Council's AQAP sets out actions for provision of public charging points.
On-road parking impedes the flow of traffic, leading to increased emissions from slowing / accelerating.	Agreed, though this is not an issue the SPD can directly address.
Measures like the High Wycombe to Bourne End cycle route need to be delivered to encourage non-car modes of transport.	The Council has committed funds to the project and is working with Sustrans as a delivery partner.
Behavioural change measures are needed to make people more aware of turning off their engines when stationary, and encouraging walking to school.	Agreed. The Council's AQAP sets out actions regarding idling; the County Council has published its 'Getting to School' strategy, which sets out its support for school travel plans.
Electric vehicles are a good thing but won't of themselves address the congestion issues in our towns.	Agreed. WDC and the County Council are developing a long-term transport strategy for High Wycombe which aims to address the transport issues in the town.

Main issue	Council response
Further enforcement is needed to tackle people running their engines in sensitive areas.	The Council has started patrols in sensitive areas, i.e. outside schools and within AQMAs, in order to educate drivers about emissions from idling engines. The Council has also provided signage and press releases to help increase public awareness. These strategies will shortly develop into enforcement patrols where fines will be issued to drivers who let their engines idle.
Green hedges and boundaries could absorb pollution or have a screening role.	Agreed. This SPD will recommend the use of green infrastructure in mitigating air pollution, alongside the Council's emerging canopy cover SPD.
Homes in sensitive areas could use filtering and ventilation to improve air quality indoors.	This may be used as a fall-back measure where other interventions are not possible. This SPD will set out how this will work for development in sensitive areas.
Need to encourage car sharing through the use of High Occupancy Vehicle (HOV) lanes.	Car sharing has long been encouraged as a means of reducing congestion and emissions. The implementation of HOV lanes themselves is not directly within the power of the Planning Authority to implement.
Decisions made at the regional level create traffic (e.g. moving hospital services from Wycombe General to Stoke Mandeville)	Agreed. The emerging transport strategy for High Wycombe will examine the case for more frequent inter-urban bus services.
Cutting back on school bus services had increased traffic and congestion	The provision of school transport is managed by the County Council.
The Householder Planning and Design Guidance SPD has recently been published for consultation. Should this not include relevant advice for extensions etc.?	The Householder Planning and Design Guidance SPD is intended to provide further guidance on good design, relating to Plan policies DM35 and DM36 in the context of householder applications.
Buildings need to install PV panels or ground-source / air-source heat pumps to reduce CO2 emissions.	Local Plan policy DM33 1 (g) sets out a requirement for development to integrate renewable technologies into developments. The Council expects to publish a guidance note on this in 2020.
How can change be effected where land is already developed?	Where developed land is redeveloped, the planning process can take some effect.

Main issue	Council response
Changing hearts and minds is the key.	Agreed. The Council's AQAP sets out actions to promote green transport options such as walking, cycling and public transport use. The Council also aims to encourage cultural change within business to promote ideas such as increased working from home, staggered working hours and green delivery options amongst others.