



Air Quality Supplementary Planning Document (SPD) Consultation Statement

March 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 was updated to reflect the feedback received and how this has been taken into account into the final version of the SPD. This final consultation statement is published alongside the SPD for adoption.

2. Habitats Regulation Assessment/ Strategic Environmental Assessment Screening

The Revised Habitats Regulations Assessment (HRA) - including Appropriate Assessment (January 2019) and Habitats Regulations Assessment of the Proposed Main Modifications for the Wycombe District Local Plan (February 2019) concluded that the Plan will not lead to any adverse effects, either alone or in combination with other plans or projects, on the integrity of the Special Areas of Conservation (SAC) in or near the District. This included an individual assessment of policies in the plan.

This Air Quality Supplementary Planning Document provides additional guidance on the application of various policies in the Development Plan. The SPD does not introduce further potential linking impact pathways. As such it does not change the conclusion in the Habitats Regulations Assessment.

It is a requirement that Sustainability Appraisal (SA) is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on strategic environmental assessment (SEA).

In terms of the Environmental Assessment of Plans and Programmes Regulations 2004, this SPD does not significantly affect the findings of the Sustainability Appraisal (which incorporates SEA within it) undertaken for the Wycombe District Local Plan, as it will not introduce anything that would result in any new or significantly different environmental problems than have already been considered through the SA for the Local Plan.

3. 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 mitigating air quality impacts 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.

4. 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

5. 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 of Buckinghamshire 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, including the Air Quality Action Plan, set out more |

| Main issue | Council response |
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| | detail on the air quality issues and the pollution levels in the AQMAs. |
| How will it apply to replacement dwellings? | Replacement dwellings are 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? | Air quality issues will be considered as part of the weighing and balancing of issues and benefits undertaken in determining an application. |
| 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 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 a 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 | The SPD will require development in the affected urban areas to provide EV charging points. The Council's |

| Main issue | Council response |
|---|--|
| of electric vehicles, not only in new development. | 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. |
| 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 existing green infrastructure policies and the 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 outside the scope of this SPD. |

| Main issue | Council response |
|---|---|
| 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 outside the scope of this SPD. |
| 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. |
| How can change be effected where land is already developed? | Where developed land is redeveloped, the planning process can take some effect. |
| 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. |

6. Who and how did we consult on the draft SPD

Formal public consultation took place on the draft Air Quality SPD between 6th January 2020 and 3rd February 2020. We received twenty-four responses.

People were made aware of the consultation through:

- Notifying statutory consultees and generic and specific stakeholders on our consultation database including parish councils.
- Including information about the consultation in the Weekly Planning Bulletin which goes out to interested individuals and organisations.
- Placing hard copies of the SPD in local libraries and the Council's Reception Area. All of the consultation material was made available on the Council's website, including a response form.

We held a consultation event on Thursday 23 January from 7 - 9 pm, which was open to all, having been advertised through the Weekly Planning Bulletin and on the Council website. The purpose of the event was to provide a brief outline of the contents of the Planning Obligations SPD and also to offer an opportunity to ask any questions.

The table below summarises the main issues arising from the public consultation; the Council's response to them, and any changes made to the SPD as a result of these comments.

7. Summary of the main issues raised from the consultation on the draft SPD, and how those issues have been addressed in the adoption version of the SPD.

| Main issue | Council response |
|---|--|
| DM33 1c should include cycling / walking rather than just alternative vehicles and fuels. | Policy DM2 provides for cycling and walking. |
| Future-proof connections for Vehicle To Grid (V2G) | This technology is still emerging and it is not clear at this stage whether V2G will become a mainstream proposition. |
| Connection pts should be provided in all new development across the District | In the light of the recent Government announcement bringing forward the date to phase out internal combustion engine vehicles, the SPD will extend the requirement for charging points to all new development across the district. |
| Flackwell Heath should have the same status in the SPD as Marlow and High Wycombe as it is next to the M40 AQMA | The justification for additional measures for development in High Wycombe and Marlow is that traffic generated by development is likely to use the roads within the AQMA; at |

| Main issue | Council response |
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| | Flackwell Heath the association between development and traffic on the M40 is weaker. |
| SSEN, the local electricity operator, is supportive of SPD; confirms that grid will anticipate demand; encourages pre-application discussions; and facilitates smart charging (protects battery and shares demand, e.g. Pod Point) | This response usefully addresses some earlier concerns raised by the Agents' Panel. |
| Upgrade minimum spec for charge points to 32A | The additional cost for upgrading supply from 16A to 32A is marginal, so this will be supported in the SPD. |
| No specific mention of Princes Risborough or Bourne End. | The SPD focuses on areas currently breaching air quality limits; however, it is written in such a way that it may be extended to any potential future areas affected by statutory breaches. See para 2.3 of the SPD. |
| Define hybrid vehicles - spaces should be restricted to full-electric or plug-in hybrid. | This would be very difficult to enforce. |
| Air quality assessment should be extended to all major development., not just those in High Wycombe and Marlow, in relation to the effects on M40. | It is unlikely that any major development outside High Wycombe and Marlow would have a significant effect on the M40. Large scale development at Stokenchurch might have an effect, but there are no plans for this. |
| Inclusion of Green Infrastructure should be mandatory. | The Local Plan has strong policies on Green Infrastructure overall, but there needs to be some flexibility for town centre sites which may be very constrained. |
| Use of filtration / mechanical ventilation within AQMAs should be mandatory | Mechanical ventilation is a measure of last resort and will not be permitted in residential development. This is now clarified in the SPD. |
| School expansions / developments should have a condition that 90% of additional children arrive by bus. | Such a condition would be unenforceable. |
| Any development relating to children (nurseries, schools) should be refused in an AQMA | Proposed development for more vulnerable groups such as children, the elderly and the infirm will be considered on a case-by-case basis. |
| Conversions / change of use within an AQMA should be refused unless they can demonstrate that internal air quality meets standards | If a proposal requiring planning permission cannot be made acceptable, then the Council reserves the right to refuse it. |

| Main issue | Council response |
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| Are charging points feasible in the Victorian streets of Marlow? | All charging points delivered through development will be on site. This is required by other development plan policies relating to parking provision in general. |
| <ul style="list-style-type: none"> • SPD should consider the environmental effects of poor air quality, e.g. on biodiversity and local SACs (e.g. Aston Rowant on M40) • Cumulative effects must be considered including the expansion of Heathrow. • Damage costs should also address damage to biodiversity | <p>This SPD specifically addresses the impacts of development in relation to the AQMAs within the District, and the effects on human health.</p> <p>The Habitats Regulations Assessment (HRA) of the Local Plan has done the necessary work to assess the environmental impacts of planned development on air quality.</p> |
| Need for odour assessment of proposals near Sewage Treatment Works | This SPD deals with issues of poor air quality linked to levels of pollutants. Odour is a different issue that has been assessed, where relevant, in the preparation of the local plan. |

A number of issues were raised which are outside of the remit of the SPD, or outside of the powers available to a Local Planning Authority.

| Main issue | Council response |
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| Enforcement of unnecessary idling - council contractors; building contractors; temporary lights to have signs encouraging drivers to switch off engines. | The Council does patrol and has powers to start fining. Resources dedicated to enforcement must necessarily be balanced against all the other calls on the Council budget. |
| Need to address existing development, e.g. kerbside charging points; subsidy for installation in public spaces in rural areas. | Agreed, the biggest wins will come from converting the existing environment, however this is not a matter that can be directly delivered by the planning system. Funds from the Community Infrastructure Levy (CIL) could be used for rural projects. The AQAP includes an action to expand on-street and off-street charging points. See also the upcoming electric vehicle strategy being prepared by the new Council. |

| Main issue | Council response |
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| Incentivise bus/taxis to convert to electric / hydrogen; create higher emissions standards for these. | This is a matter for taxi licensing and alignment of standards in the new Council. The AQAP includes an action for the conversion of the bus fleet; this is also gaining profile on the national agenda |
| More frequent / more flexible bus services (smaller vehicles) | The Council is developing a transport strategy for High Wycombe which will include public transport improvements. The Council is bidding for funds to introduce a pilot Demand Responsive Transport scheme in High Wycombe. |
| More radical intervention to encourage cycling / walking; deter the car; 20 mph limits in Marlow town centre | Cycling and walking promotion is included in the AQAP. An emissions study is being commissioned for Marlow which will make recommendations for action. |
| More emphasis required on reducing traffic, especially from the expansion at Princes Risborough, e.g. through bus provision. | Plan policies for Princes Risborough set out a number of measures for reducing traffic from the expansion. |
| Expansions should be more self-contained in terms of locally provided services. | Where appropriate, strategic site policies in the local plan set out requirements for local services such as schools, shops, recreation and health services. |
| Create an Ultra-Low Emission Zone for High Wycombe | Lessons learned from the Marlow emissions study may be applied to High Wycombe. |
| All existing retail car parks (e.g. Morrisons, ALDI) to install charging points before 2023 | The Council has written to all supermarkets but has no powers to force them to install charging points. |
| Council vehicles should be electric and / or hybrid by 2023 | The AQAP sets out an action for Council-procured vehicles. |