

LYNSTED with KINGSDOWN PARISH COUNCIL



21 April 2023

AQS Review
Air Quality and Industrial Emissions Team
Defra
Ground Floor
Seacole Building
2 Marsham Street
London
SW1P 4DF

Dear Sirs

We refer to your consultation on Air Quality Strategy.

As is often the case with Government consultations of this nature, the prescriptive questionnaire format makes it impossible for us to convey our views on how to manage harmful pollution in our community.

We have therefore summarised key strategic points below and trust these will be incorporated into your thinking.

1. **End-to-end responsibility:**
 - a. Despite NPPF Guidelines, LAs rarely apply the test of “cumulative impacts” arising out of their planning approvals irrespective of scale.
 - b. Communities should have open access (web-based) to calculations of additional harm arising from **every** planning proposal. Currently, if developers mount an argument that their development has “negligible” impact when taken in isolation, the issue of cumulative impacts is simply ignored.
 - c. Local authorities have set “Zero Carbon” targets, which makes the AQS an important instrument for reinforcing NPPF linkages between planning and pollution.
2. **“Real world” continuous measurement is the exception rather than the rule.** There has been a failure to address ‘real-time’ PM2.5, in particular, and all other harmful emissions in general. For example, our LA has doggedly refused to implement ‘real time’ measurement of key pollutants in all their AQMAs. They have been glacially slow and geographically inconsistent. NOx is the one pollutant that LAs have very little control over – it is National Government (and historic EU) policies that have been the drivers of NOx reduction.

- a. A resident, using wearable monitors, has demonstrated that our local authority's decision favouring the "averaging" of NO_x pollution (NO_x only) over a month or year, based on single diffusion tubes, is flawed in terms of its crude technology and limited relevance to PM_{2.5} harms. He demonstrated that our Borough Council's preferred approach misses regular episodes of Very High (hourly thresholds breached) and High (24-hour thresholds breached).
- b. Communities should have open access to "real time", "real world" measurements of the four key harmful pollutants most associated with the passage of vehicles through 'main-corridors' in built-up areas in urban and rural settings. This could readily be provided using internet applications to integrate, map and graph trends in pollution across the Borough. This would:
 - i. Give residents the information needed to understand when small changes in their behaviour might protect them from the worst harms (e.g., routes and times best suited for work, outdoor activities, and amenity enjoyment).
 - ii. Help residents to understand the science behind harmful pollution and act accordingly. When travelling in congested traffic - close ventilation to prevent intake and concentration of direct exhaust and friction particulates. When committed to 'active travel' (walking or cycling) in a town or city settings – taking less polluted routes or choose times of lower pollution.
 - iii. Serve HMG Departments in monitoring and planning progress against targets and preparing future interventions.
 - iv. Recognise that pollution does not respect administrative boundaries. By mandating live reporting by local authorities, the 'how, when and where' decisions we make for our travel or outdoor activities will be better informed.
 - v. Encourage "citizen science" projects that measure changes in pollution using affordable fixed and wearable devices. Their objective accuracy, when measured against reference devices, can have around a 10% margin of error, depending on pollutant and age of the devices used. However, their use will help inform public engagement and understanding of more structured 'real time' mapping by LAs. Such devices can support mapping and would be effective in measuring direction of travel for pollutants over time.
3. [Cross-compliance with related policy areas](#). For example, local authorities, in implementing their Local Plans, should specifically draw together "zero carbon" strategies, regularly reviewed community sustainability assessments, and levels of cumulative (NPPF) harmful pollution in planning decisions in and close to AQMAs. Those connections need to be strongly supported by multidisciplinary and open collaboration with neighbouring authorities and regional authorities.

In conclusion, the single most important focus of a renewed AQS must be “enforcement”. Simple aspirational objectives are worse than useless in the unequal balance of power between local authorities, developers, and local communities.

Yours sincerely

JULIEN SPEED

Chairman

Lynsted with Kingsdown Parish Council