NORTH DEVON AND TORRIDGE LOCAL PLAN 2011-2031

Air Quality Supplementary Planning Document (SPD)

Adopted 5th October 2020

TORRIDGE DISTRICT COUNCIL

northdevon COUNCIL

v1.1 | 5th October 2020

Change History

Version	Date	Remarks
v1	June 2020	Original Version (Adopted by North Devon Council Only)
v1.1	October 2020	Minor correction to guidance on the application of SSSI IRZ when assessing agricultural development.

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i Foreword

1 This supplementary planning document (SPD) sets out how North Devon and Torridge District Councils will consider the potential for new developments to affect air quality adversely, which types and scales of planning applications require an air quality impact assessment, and if so what an air quality impact assessment should include. The SPD provides additional detail to relevant policies contained in the North Devon and Torridge Local Plan 2011-2031 (NDTLP).

2 The SPD is provided to help applicants interpret and respond positively to the policy requirements established through NDTLP Policies DM02: *Environmental Protection*, ST03: *Adapting to Climate Change and Strengthening Resilience* and BRA(h*): Spatial Development Strategy for Braunton and Wrafton*. Advice is provided to support planning applications where operation and occupation of new development, and/or demolition and construction during development and/or new agricultural development may affect air quality adversely. The SPD will be used alongside the NDTLP in the decision making process when the Councils consider the referenced forms of development.

3 For clarity, while the NDTLP was framed to reflect national planning policy set out in the 2012 National Planning Policy Framework (NPPF), this SPD also looks to the provisions of the revised NPPF, which was effective in respect of decision making from the date of publication (19th February 2019).

4 A draft of this SPD was published for public consultation between 26th September 2019 to 8th November 2019. All duly made representations in response to the consultation are available to view via the Councils' Consultation Portal at: https://consult.torridge.gov.uk/portal.

5 All representations received on time and relevant to this SPD were considered by North Devon and Torridge District Councils and, where considered necessary, the SPD was amended in response to representations received. The SPD was originally adopted by North Devon Council on 1st June 2020, with this version, subject to a minor revision, adopted in parallel with Torridge District Council on 5th October 2020, from which date the content of this SPD will be used as guidance for the relevant NDTLP policies as part of the decision making process on relevant planning applications.

1 Introduction

1.1 The quality of the air we breathe can have an effect on human health and quality of life. It can also impact upon local ecosystems and the area's micro-climate.

1.2 There is an obligation on all local authorities under Part IV of the 1995 Environment Act to review regularly and assess air quality in their areas and to determine whether or not national air quality objectives are likely to be achieved. Where exceedances are considered likely, the local authority must declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in pursuit of required air quality improvements.

1.3 An AQMA and an AQAP were determined to be required for Braunton village centre and an AQMA was formally declared along Caen Street on 11 July 2011. Further details are set out in section 6 of this document. One of the measures identified within the AQAP is developing a supplementary planning document (SPD) regarding air quality. This document is a draft SPD towards fulfilling this objective. This is currently the only AQMA designated in North Devon and Torridge districts, although others could be designated in the future.

1.4 New developments have the potential to affect air quality adversely or be affected by poor air quality. Air quality is capable of being a material consideration to be taken into account as part of the planning process in order to limit exposure and protect people from unacceptable risks to their health. However, it must be balanced against other aims of the planning system in order to deliver sustainable development and to achieve social, economic and environmental goals and meet other policy requirements.

1.5 As such, adequate and satisfactory mitigation measures will be required for situations where an air quality impact assessment indicates that development will result in an adverse impact upon air quality, whether within Braunton village centre or in any other locations across northern Devon.

1.6 This SPD is intended to clarify the process of assessing air quality and to provide transparent and consistent advice for applicants, the local community and the local planning authority where air quality needs to be addressed. It will also provide a means for assessing the adequacy of an air quality impact assessment.

1.7 The adopted SPD will be a material consideration in determining planning applications across North Devon and Torridge districts to supplement the quoted policies within the adopted Local Plan. As such it will be given significant weight in the decision making process in relation to air quality matters. Within Braunton, it should also be read in conjunction with the AQAP and previous annual status reports submitted to Defra and progress towards required air quality improvements.

2 A Policy Overview

2.1 The Planning and Compulsory Purchase Act 2004 at section 38(6) requires that, if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

2.2 In determining the acceptability of development proposals potentially affecting air quality, the starting point for both North Devon Council and Torridge District Council are the provisions contained in the adopted development plan; the principal relevant component in this case is the North Devon and Torridge Local Plan 2011-2031.

North Devon and Torridge Local Plan 2011-2031 (NDTLP)

2.3 The NDTLP was adopted by North Devon Council and Torridge District Council through resolution at meetings of their respective Full Councils on 29th October 2018.

2.4 The NDTLP recognises the importance of air quality to public health and wellbeing. It is important for the planning system to help improve air quality and minimise the exposure to poor air quality. The NDTLP policies of most direct relevance to improving air quality are set out below:

2.5 Policy DM02: *Environmental Protection* relating to the AQMA states:

> "(2) *Development will be supported where it does not result in unacceptable impacts to:*
>
> > *(a) atmospheric pollution by gas or particulates, including smell, fumes, dust, grit, smoke and soot;*
>
> *(3) Development and traffic proposals that help to deliver measures identified within a Local Air Quality Action Plan or improved overall air quality will be supported*".

2.6 Paragraph 13.21 goes on to state that: "*The Councils will not support development where anticipated traffic generation would make air quality worse*."

2.7 Policy ST03: *Adapting to Climate Change and Strengthening Resilience* states:

> *"Development should be designed and constructed to take account of the impacts of climate change and minimise the risk to and vulnerability of people, land, infrastructure and property by:*
>
> > *(h) ensuring risks from potential climate change hazards, including pollutants (or air and land) are minimised to protect and promote healthy and safe environments."*

2.8 In addition, the Spatial Development Strategy for Braunton and Wrafton (Policy BRA) indicates that the spatial vision will be delivered through:

> "*(h) improved traffic management and improved air quality in the village centre".*

National Policy

These policy requirements are considered to be consistent with paragraph 181 of the National Planning Policy Framework (NPPF)[1]:

> *"Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan."*

2.9 Paragraph 170(e) of the NPPF also indicates that:

> *"Planning policies and decisions should contribute to and enhance the natural and local environment by: e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air quality;"*

2.10 DEFRA published its Clean Air Strategy in 2019, which identifies air pollution as the top environmental risk to human health in the UK, making us more susceptible to other illnesses. The strategy recognises that air pollution can be caused not only by emissions from road transport and burning fossil fuels, but also by intensive agricultural food production and heating our homes. it sets out a range of practical actions to reduce emissions. Planning Practice Guidance was updated in November 2019 to provide guidance on assessing and addressing air quality from damaging air pollutants.

Supplementary Planning Document

2.11 This SPD supplements these Local Plan policies and provides guidance as to:

a. which developments may have a potential impact on air quality, thereby requiring an air quality impact assessment (AQIA) to be undertaken;

b. how potential impacts on air quality will be assessed from demolition and construction works;

c. what an AQIA (when required) should include;

d. how it should be prepared to identify likely effects from proposed development;

e. how the significance of potential impacts on air quality from proposed development will be assessed; and

f. how potential adverse impacts on air quality could be avoided, minimised or mitigated.

1 National Planning Policy Framework (MHCLG), February 2019; https://www.gov.uk/government/publications/national-planning-policy-framework--2.

2.12 It is important to note that whilst this SPD focuses on the implementation of Policies DM02, ST03 and BRA, in considering any proposal that will potentially affect air quality, all relevant policies of the NDTLP will be taken into account when determining planning applications.

3 When is an Air Quality Impact Assessment (AQIA) required?

3.1 A precautionary approach should be taken in terms of assessing whether an air quality impact assessment (AQIA) is required. As such, where there is sufficient doubt or uncertainty as to likely air quality impacts, then an AQIA should be undertaken.

3.2 An AQIA is not required just to assess and mitigate any potential impacts on air quality within and adjoining a designated AQMA. It is also intended to assess potential impacts in other undesignated areas where the Councils consider that exceedance of air quality objectives is a possibility, either temporarily or in the longer term. It is intended to prevent air quality targets being exceeded in these areas and to avoid the need for further AQMAs to be designated. An AQIA will become a material consideration to be considered as part of determining the planning application for which it was submitted.

3.3 Potential adverse impacts on air quality could arise from:

a. Traffic flow emissions resulting from occupation and operation of completed development; and/or

b. Emissions arising from operation of completed development; and/or

c. Demolition and construction works during development.

These potential impacts and their requirement for an AQIA are assessed separately below.

A. Occupation and Operation of Completed Development

3.4 The potential for adverse impacts upon air quality arising from occupation and operation of proposed development will be influenced by a combination of factors:

a. The **location** of a development and its likelihood of increasing traffic flows;

b. The **scale** of development since larger developments would be expected to generate proportionally more traffic movements;

c. The **type** of development with commercial developments more likely (than residential development) to generate movements of lorries and other large vehicles which are more likely to emit nitrous oxides;

d. The **seasonal variation** in traffic generation arising from a development in combination with potential existing seasonal variations in air quality; tourism attractions / accommodation are likely to generate cumulatively more variation in levels of traffic at certain times of year than residential development.

3.5 As part of applying a precautionary approach in practice, thresholds will be used to screen out when an AQIA is not required. Table 1of this SPD is derived from Table 6.2 of *Land-Use Planning & Development Control: Planning for Air Quality (January 2017)* http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf *and identifies the thresholds at and above which an AQIA is required for different types of development.*

Table 1 Indicative Criteria and Thresholds for Requiring an Air Quality Impact Assessment by virtue of Occupation and Operation of Completed Development

The development will:	**Indicative Criteria to Proceed to an Air Quality Impact Assessment**
1. Cause a significant change in Light Duty Vehicle (LDV) LDV = cars and small vans <3.5t gross vehicle weight traffic flows on local roads with relevant receptors.	A change of LDV flows of: -- more than 100 Annual Average Daily Traffic (AADT) within or adjacent to an AQMA -- more than 500 AADT elsewhere.
2. Cause a significant change in Heavy Duty Vehicle (HDV) HDV = goods vehicles + buses >3.5t gross vehicle weight flows on local roads with relevant receptors.	A change of HDV flows of: -- more than 25 AADT within or adjacent to an AQMA -- more than 100 AADT elsewhere.
3. Realign roads, i.e. changing the proximity of receptors to traffic lanes.	Where the change is 5 metres or more and the road is within an AQMA.
4. Introduce a new junction or remove an existing junction near to relevant receptors.	Applies to junctions that cause traffic to significantly change vehicle accelerate/decelerate, e.g. traffic lights, or roundabouts.
5. Introduce or change a bus station.	Where bus flows will change by: -- more than 25 AADT within or adjacent to an AQMA -- more than 100 AADT elsewhere.
6. Have an underground car park with extraction system.	The ventilation extract for the car park will be within 20 m of a relevant receptor. Coupled with the car park having more than 100 movements per day (total in and out).
7. Have one or more substantial combustion processes, where there is a risk of impacts at relevant receptors. NB. this includes combustion plant associated with standby emergency generators (typically associated with centralised energy centres) and shipping.	Typically, any combustion plant where the single or combined NO_x emission rate is less than 5 mg/secAs a guide, the 5 mg/s criterion equates to a 450 kW ultra low NO_x gas boiler **or** a 30kW CHP unit operating at <95mg/Nm^3. Users of this guidance should quantify the NO_x mass emission rate from the proposed plant, based on manufacturers' specifications and operational conditions. is unlikely to give rise to impacts, provided that the emissions

	are released from a vent or stack in a location and at a height that provides adequate dispersion. In situations where the emissions are released close to buildings with relevant receptors, or where the dispersion of the plume may be adversely affected by the size and/or height of adjacent buildings (including situations where the stack height is lower than the receptor) then consideration will need to be given to potential impacts at much lower emission rates. Conversely, where existing nitrogen dioxide concentrations are low, and where the dispersion conditions are favourable, a much higher emission rate may be acceptable.

3.6 In the absence of information to the contrary, the Councils will assume an average of 8 daily traffic movements per dwelling. As such, developments of more than 12 residential units (net) would be likely to trigger a change of light duty vehicle flows of more than 100 Annual Average Daily Traffic (AADT) within or adjacent to an AQMA. Adjacent to an AQMA includes developments where the majority of traffic movements are likely to involve travel through an AQMA. Elsewhere, the trigger threshold would be more than 62 residential units (net) likely to trigger a change of light duty vehicle flows of more than 500 AADT.

3.7 For heavy duty vehicle flows, a change of more than 25 AADT within or adjacent to an AQMA and more than 100 AADT elsewhere would be triggered by a major commercial or industrial development.

3.8 The projected AADT for both light duty vehicles flows and heavy duty vehicle flows for all major developments would need to be identified within a Transport Assessment required by Policy ST10: *Transport Strategy* of the NDTLP for developments generating significant traffic movements.

3.9 The identified need for an AQIA does not necessarily mean that there will be an impact on air quality, but that a formal AQIA is required to assess whether there would be a likely impact or the significance of that impact. Minor developments are not expected to have any notable impact upon air quality so are screened out as not requiring an AQIA.

3.10 Where required, an AQIA should be proportionate to the nature and scale of proposed development and any suspected air quality impacts. The scale of any formal AQIA can be agreed in advance with the relevant Council.

3.11 Lower thresholds within or adjacent to an AQMA recognise that development within or adjoining an AQMA is more likely to impact air quality adversely than sites further away. However, it also recognises that major developments generating high levels of traffic flows can still have a potential adverse impact on local air quality outside a designated AQMA.

3.12 The potential impact of proposed development should be considered at the earliest possible stage, especially for proposed major developments. The need for an AQIA should be identified and considered as part of any pre-application process as well as through the environmental impact assessments (EIA) screening and scoping process.

Impact on Occupants of Developments

3.13 In addition to potential adverse impacts on air quality arising from new developments, it is recognised that new developments can lead to exposure to poor air quality for the occupants of a proposed development, or visitors to it. As such, all proposals for new development within or adjoining an AQMA should undertake an AQIA to assess potential impacts upon the future occupants, businesses and visitors to the development. Elsewhere, the potential impact on occupants and visitors to proposed developments will be triggered by the indicative criteria and thresholds set out in Tables 1 and 2 and should be considered as part of the required AQIA. In such cases, the design of new development should seek to avoid or mitigate any adverse potential health impacts on occupants and visitors to the proposed development.

B. Emissions from Operation of Completed Development

3.14 The operation of some industrial and commercial developments may lead to emissions that could affect air quality adversely. Such emissions are most likely to be emitted from chimneys and flues.

3.15 Where such developments have been screened to require an environmental impact assessment (EIA), then an assessment of the potential impact on air quality will be incorporated within the scoping of that EIA, which would overcome the need for a separate AQIA to be prepared.

3.16 When an EIA is not required for such development then an AQIA is not required. However, the Councils would expect a precautionary approach to be taken by following the mitigation hierarchy set out in paragraph 5.1. In practice, potential adverse impacts on air quality should be avoided whenever possible. If not possible then any potential adverse impacts should be minimised before adequate mitigation measures are required to address any residual adverse impacts.

3.17 If a potential air quality issue is likely, then incorporation of mitigation measures should be considered where possible at an early stage of planning. This could include moving potential sources of emissions further away from occupants, visitors and other receptors such as passing pedestrians.

C. Demolition and Construction Works during Development

3.18 Dust (including particulate matter up to 75 microns) may be emitted during construction, demolition and earth moving works. Dust is solid particles suspended in the air or settled out having been suspended. Activities generating dust can have potential cumulative harmful effects on air quality and health, albeit predominantly during the construction and demolition works and immediately afterwards. However, temporary emissions of dust during the construction are of concern as they add to the overall exposure to particulate matter of residents, visitors and site workers.

3.19 Significant generation of dust may be anticipated where:

a. A substantial building (or group of buildings) is to be demolished;

b. Substantial earth moving is proposed, such as raising land levels;

c. A major construction site is proposed or construction is scheduled over a prolonged period.

3.20 In these instances, an AQIA should be undertaken to assess the air quality impacts of demolition, construction and earthworks. This could be incorporated within any AQIA when it is also required by virtue of traffic flow generation from occupation and operation of completed development (sections A and B above). Alternatively it could be incorporated within an environmental impact assessment (EIA), where the construction phase is identified as part of the EIA scoping process.

3.21 Assessment of air quality impacts associated with construction, demolition and earthworks may also be required outside the formal EIA process where a significant emission of dust is anticipated. The Councils recognise that dust generation is likely to be influenced by soil types, ground condition, location and weather and will disperse through the air. As part of applying a precautionary approach in practice, thresholds will be used to screen out when an AQIA is not required.

3.22 Table 2 of this SPD identifies the thresholds at and above which an AQIA is likely to be required for different types of development. However, these thresholds are indicative by virtue of the identified factors that are likely to influence dust generation. Where an AQIA is considered necessary, it should be proportionate to the nature and scale of proposed development and any suspected air quality impacts. The scale of any formal AQIA **should be agreed in advance with the relevant local planning authority**.

Table 2 Indicative Criteria and Thresholds for Requiring an Air Quality Impact Assessment by virtue of Demolition and Construction Works during Development

Type of development:	Threshold above which to Proceed to an Air Quality Impact Assessment
1. A substantial building (or group of buildings) is to be demolished.	Total internal floorspace in excess of 1,000 square metres.
2. Substantial earth moving is proposed.	The extent of earth moving on a site covers a surface area in excess 2.5 hectares.
3. A major construction site is proposed or construction is scheduled over a prolonged period.	Total site area in excess of 4 hectares.

3.23 The identified need for an AQIA does not necessarily mean that there will be an impact on air quality, but that a formal AQIA is required to assess whether there would be a likely impact or the significance of that impact. Small scale developments are likely to generate only very localised or temporary impacts, so are not expected to have any notable impact upon air quality. They are screened out as not requiring an AQIA.

4 What should an Air Quality Impact Assessment (AQIA) include?

4.1 The purpose of an AQIA is to quantify:

a. changes in pollutant concentrations estimated to result from a proposed development (during both construction as well as future occupation and operation); and/or

b. estimated exposure to poor air quality for new development.

4.2 A suitable AQIA will need to:

a. incorporate an air quality modelling study, in accordance with a modelling method agreed in advance with North Devon or Torridge District Council;

b. be prepared in accordance with the latest guidance that represents best practice; and

c. be proportionate to the nature and scale of proposed development and any suspected air quality impacts.

4.3 Relevant guidance is currently provided by *Land-Use Planning & Development Control: Planning for Air Quality* (January 2017) [(2)] by the Institute of Air Quality Management (IAQM) and Environmental Protection UK, and by *Guidance on the Assessment of Dust from Demolition and Construction* (January 2014) [(3)] by IAQM; in both cases including any successor or related documents.

4.4 An AQIA will assess the effect(s) that a proposed development will have on air quality associated with the projected road traffic emissions and construction works, including any proposed mitigation measures. Where applicable, this assessment should include projected traffic generation from the development including:

a. trip rates (by types of transport) associated with each of the main uses proposed by the development;

b. the frequency of these trips and most likely times of day;

c. any anticipated variation in frequency (seasonality) of trips during the year;

d. the frequency of alternative route(s) likely to be taken for these trips;

e. the types of vehicles being used, including vehicle fleet composition and emission factors where applicable.

4.5 The cumulative potential air quality impacts of developments is significant because many individual schemes, deemed insignificant in themselves, can contribute to a “creeping baseline”. The impact of a proposed development should be assessed cumulatively with any other relevant commitments for major developments and/or other sites in the locality identified in the Local Plan or a Neighbourhood Plan.

2 http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf
3 http://iaqm.co.uk/wp-content/uploads/guidance/iaqm_guidance_report_draft1.4.pdf

4.6 The baseline data for pollutant concentrations to be used for any modelling should be the most recently published annual data. This will also **need to be agreed in advance with the local planning authority**.

4.7 The baseline data for traffic flows, including known daily and seasonal variations, **needs to be agreed in advance with the local highway authority**. An AQIA will only be accepted using baseline data for traffic flows that has been agreed in advance by the local highway authority. These details should be agreed as a part of any pre-application process as well as through the environmental impact assessments (EIA) screening and scoping process.

4.8 For proposed development within or adjoining a designated AQMA, in addition to an estimate of traffic generation arising from the proposed development, there will also need to be a quantified assessment of the estimated exposure to poor air quality for occupants of the development, or visitors to it.

4.9 The AQIA should also identify and set out clearly:

a. any assumptions made in estimating the effect(s) that a proposed development will have on air quality;

b. any known uncertainties, errors, adjustments and verification relating to the modelling;

c. any mitigation measures, or combination of measures, proposed to be taken to reduce potential air quality impacts;

d. the potential reductions in air quality impacts projected to arise from these mitigation measures; and

e. details of the deliverability and timetable for any proposed mitigation measures.

5 How can potential adverse impacts be avoided, minimised or mitigated?

5.1 Potential adverse impacts should be avoided whenever possible. However, if avoidance is not possible then any potential adverse impacts should be minimised. Adequate mitigation measures are required to address any residual adverse impacts.

5.2 Opportunities for minimising or mitigating potential impacts will vary according to the type and location of proposed development. The following examples may be relevant for some types and locations of development generating air quality impact from traffic flow emissions, but the Councils recognise that they will not all be applicable or realistic opportunities for all developments.

1. **Modal shift** – encourage or require travel by vehicles other than motor cars;

2. **Relocation** – relocate proposed development to other areas within North Devon and Torridge where there would be less adverse impact upon air quality (subject to compliance with other relevant policies within the Local Plan);

3. **Directions and signage** – advertise and encourage vehicular travel to locations using alternative routes subject to the capacity and convenience of those alternative routes;

4. **Low emission vehicles** – use of low emission vehicles;

5. **Green Infrastructure** – plant trees within or adjoining an AQMA (or other location with an anticipated adverse impact on air quality) subject to necessary highway authority and land owner agreements and/or use of green roofs for new development;

6. **Traffic flows** – relocate potential congestion points (such as pedestrian crossings or traffic lights) further away from the AQMA (or other location with an anticipated adverse impact on air quality);

7. **Design and Layout** – amend the layout of proposed developments to relocate the most sensitive uses, or the movement of visitors, away from the parts of a site most likely to be subjected to poor air quality. Alternatively, move potential sources of emissions further away from occupants, visitors and other receptors.

5.3 Where air quality impacts are expected to arise from demolition and construction works then a Construction and Environmental Management Plan should be prepared in accordance with the Environment Agency's *Pollution Planning Guidance 6 – Working at Construction and Demolition Sites* (2012)[4] . It will identify how the environment will be protected during development of a site, including opportunities for damping a site to control generation of dust.

5.4 Any direct mitigation measures proposed as part of a development should be identified. If the above opportunities are not relevant or not achievable, then mitigation could still be achieved by delivering identified measures within the package of measures identified through an AQAP. These works could be undertaken by the developer, or delivered by the relevant Council funded through collection of financial contributions. Contributions would be collected through developer obligations, either through Community Infrastructure Levy (CIL) contributions,

4 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/485215/pmho0412bwfe-e-e.pdf

where CIL has been adopted by the relevant Council, or through a section 106 contribution where it is necessary, relevant and proportionate in scale to the development. The contributions would help to fund and deliver projects identified in the AQAP.

5.5 The Councils publish air quality status reports annually on their websites.

6 Designated Air Quality Management Areas

6.1 Where Local Authorities identify an exceedance of the air quality for any one of a number of identified pollutants where there is relevant public exposure, it has a statutory duty to declare an Air Quality Management Area (AQMA).

Braunton

6.2 An AQMA was formally declared along Caen Street in Braunton village centre on 11 July 2011 (see Figure 1). A Further Assessment of air quality in 2012 indicated that approximately 90% of nitrous oxides (NO_x) in Braunton are attributable to traffic sources (vehicle emissions) and that a reduction of at least 22% in road NO_x was required to meet target levels.

Figure 1 Boundary of Air Quality Management Area No. 1 in Braunton

6.3 An Air Quality Action Plan (AQAP) for Braunton was adopted in May 2016. It identifies a package of achievable measures which will contribute to achieving the required 22% reduction in nitrogen dioxide (NO_2) (annual mean) which currently are affecting air quality adversely within the centre of Braunton, particularly along Caen Street.

6.4 It is recognised that new development can have an adverse impact on pollution arising from road traffic and, in turn, on people's exposure to air pollution. No single affordable solution has been identified; therefore a package of measures is included within the AQAP setting out how North Devon Council, in partnership with Devon County Council as local highway authority and other local stakeholders, intends to achieve the required air quality improvements.

6.5 Details of the AQMA and AQAP can be found on North Devon Council's website http://www.northdevon.gov.uk/environment/air-quality/ . One of the measures identified within the AQAP is developing a supplementary planning document (SPD) regarding air quality. This document is a draft SPD towards fulfilling this objective.

6.6 The designated Braunton AQMA is a relatively small area and there are relatively few opportunities for new development within and immediately adjoining this area.

7 Agricultural Development

7.1 Air quality is affected adversely by ammonia (NH_3), which is harmful both to the natural environment and human health. 87% of ammonia [(5)] is produced by the agricultural sector with dairy and beef contributing 48% of all agricultural emissions.

7.2 The UK has adopted legally binding international targets to reduce emissions of ammonia by 2020 and 2030. The Clean Air Strategy [(6)]states that a combination of regulations, permitting and support will be introduced to reduce emissions from livestock accommodation, storing and spreading of manures and application of fertilisers.

7.3 In North Devon and Torridge the levels of ammonia and rates of nitrogen deposition are above those considered to cause loss of species and habitat damage on sites such as Braunton Burrows and the Culm Grasslands.

7.4 Potential adverse impacts on air quality are most likely to arise from:

a) an agricultural building to house livestock (primarily beef and dairy cattle, pigs or poultry); and/or

b) any new or expanded pit, tank or lagoon for storing slurry; and/or

c) any anaerobic digester with combustion plant; and/or

d) any anaerobic digester without combustion plant.

7.5 Depending on the scale and proposed proximity to either a European Protected Site or a Site of Special Scientific Interest, a planning application for the above may need to be accompanied by an Air Quality Impact Assessment (AQIA). Whether or not an assessment needs to be undertaken in response to proximity to SSSIs or European Designated Sites can be established by consulting the SSSI Impact Risk Zone (IRZ) layer on MAGIC[(7)]. This assessment must include, as a minimum, a Simple Calculation of Atmospheric Impact Limits (SCAIL) assessment. For development of the types set out in a), b) and c) the need for a SCAIL assessment will only apply if they are within a maximum of 10 kilometres of a European protected site or 5 kilometres of a Site of Special Scientific Interest; and for d) if they are within 500 metres of either.

7.6 If a SCAIL assessment is required with an application, Natural England should be consulted. A SCAIL assessment is not required for agricultural buildings to house primarily sheep or horses.

7.7 If the SCAIL assessment indicates that the process contribution from the proposal will exceed the 4% screening threshold then appropriate mitigation measures should be identified, such as amending the siting or design of the development. If the SCAIL assessment does not exceed 4% then further mitigation is not required.

5 https://www.gov.uk/government/statistics/emissions-of-air-pollutants
6 Clean Air Strategy 2019 (Defra, 2019) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf
7 https://magic.defra.gov.uk/

7.8 The SCAIL input and output files [8] should be submitted to accompany the above listed types of planning applications, whether or not significant impacts are identified. This will form part of the validation process for such planning applications.

8 Refer to SCAIL User Guide: http://www.scail.ceh.ac.uk/agriculture/Sniffer%20ER26_SCAIL-Agriculture%20USER%20GUIDE%20Final%20Issue%2011032014.pdf

Appendix 1: Glossary

Term	Definition
Annual Average Daily Traffic (AADT)	The total volume of traffic passing a point or segment of a highway (eg site access) in both directions for one year divided by the number of days in the year.
Air Quality Action Plan (AQAP)	A plan setting out a strategy and range of realistic and deliverable measures to improve air quality where it is does not achieve national air quality standards.
Air Quality Impact Assessment (AQIA)	A plan setting out a strategy and range of realistic and deliverable measures to improve air quality where it is does not achieve national air quality standards.
Air Quality Management Area (AQMA)	An area declared by a Local Authority where national air quality standards have not been achieved through ongoing monitoring and assessment.
Community Infrastructure Levy (CIL)	A levy that local authorities can choose to charge on certain types of development in their area, with the collected funding then used to help deliver infrastructure that the Councils, local community and neighbourhoods require.
Environmental Impact Assessment (EIA)	A report prepared alongside a planning application that is likely to have significant effects on the environment, to ensure that any full knowledge of those likely effects is taken into account in the decision making process.
Heavy Duty Vehicle (HDV)	Goods vehicles + buses >3.5t gross vehicle weight.
Light Duty Vehicle (LDV)	Cars and small vans <3.5t gross vehicle weight. DEFRA published its Clean Air Strategy in 2019, which identifies air pollution as the top environmental risk to human health in the UK, making us more susceptible to other illnesses. The strategy recognises that air pollution can be caused not only by emissions from road transport and burning fossil fuels, but also by intensive agricultural food production and heating our homes. it sets out a range of practical actions to reduce emissions. Planning Practice Guidance was updated in November 2019 to provide

	guidance on assessing and addressing air quality from damaging air pollutants. DEFRA published its Clean Air Strategy in 2019, which identifies air pollution as the top environmental risk to human health in the UK, making us more susceptible to other illnesses. The strategy recognises that air pollution can be caused not only by emissions from road transport and burning fossil fuels, but also by intensive agricultural food production and heating our homes. it sets out a range of practical actions to reduce emissions. Planning Practice Guidance was updated in November 2019 to provide guidance on assessing and addressing air quality from damaging air pollutants.
Local Air Quality Management (LAQM)	A requirement under Part IV of the 1995 Environment Act for all local authorities to review whether air quality standards and objectives are being met within their areas. When not being met, there is a duty to identify those parts of its area in which those standards are not being achieved.
Simple Calculation of Atmospheric Impact Limits (SCAIL)	An online screening tool that can estimate the potential effects of ammonia from agricultural development on semi-natural areas such as Special Areas of Conservation (SACs) and Sites of Special Scientific Interest (SSSIs) and can assess whether impact limits are likely to be exceeded.

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