

## MATTER 10b: AIR QUALITY

1. This Hearing Statement has been prepared on behalf of Slimbridge Parish Council (SPC), who have submitted extensive representations in relation to the proposed Wisloe new settlement (hereafter referred to as "PS37").

**Q18. The Plan at paragraph 6.40 states that air quality within the District is 'predominantly good' but also identifies that a very small number of locations could potentially exceed the annual average for nitrogen dioxide (NO<sub>2</sub>) and fine particulation (PM10). Which locations is the Plan referring to and how have these been identified?**

2. It is difficult to see how it can be claimed that air quality is predominantly good when the 2020 Air Quality Status Report (ASR) issued by Stroud District Council in July 2020 [EB44] shows there is little monitoring of air quality close to the M5 where a number of developments are planned, including PS37. See SPC Regulation 19 representations – Appendix 12 [CD5d 953].

**Q20. At paragraph 6.41 the Plan seeks to minimise 'any potential air quality issue by locating development 'where there is a viable range of transport choices'. Have appropriate assessments of the effect of the planned growth on air quality been carried out to ensure that this is the case? Does the Plan provide appropriate measures to mitigate any impacts, including cumulative impacts?**

3. The assessments have been erroneously made on the assumption that there will be increased local employment and most people will make use of public transport or cycle. For PS37 the impact of development in nearby Cam will mean that demand for employment will far exceed the availability. PS37 is on the wrong side of the M5 to make use of the 'transport hub' at Cam and Dursley railway station. The station is already at full capacity for commuting and local bus services are poor, inconvenient and deteriorating. The developments will significantly increase local traffic and pollution.

**Q21. The policy seeks development that is 'likely to exacerbate existing areas of poorer or marginal air quality' to provide mitigation measures.**

- a. Does the Plan clearly define where these areas of poorer or marginal air quality are located?
- b. How will a decision-maker know whether development is likely to exacerbate air quality issues?

**c. Is it clear when a formal air quality assessment may be required?**

4. As stated under question 20, the lack of adequate monitoring near the M5 means that it is not known where all the areas of poor or marginal air quality are located. In December 2020 Philip Barlow, the inner south London coroner, said Ella Kissi-Debrah's death in February 2013 was caused by acute respiratory failure, severe asthma and air pollution exposure. He said she was exposed to nitrogen dioxide and particulate matter (PM) pollution in excess of World Health Organization guidelines, the principal source of which were traffic emissions. NO<sub>2</sub> and particulates are denser than air and because PS37 is below the level of the motorway and the A4135, these pollutants will tend to accumulate on the site. PS37 should have had a formal air quality assessment before being included in the Plan.

**Q24. The policy provides an open list of potential mitigation measures which a development may include. It is not prescriptive. How will a decision-maker know which mitigation measures are necessary for a proposed development? Are the measures listed justified and effective?**

5. Air quality is not effectively measured for much of the M5/A38 corridor. PS37 is bordered by an elevated section of the M5 and split by the elevated A4135. It will not be possible to mitigate against existing pollution levels or those caused by increased traffic volumes. See SPC Regulation 19 representations – Appendix 12 [CD5d 953]..

**Q25. Overall is the policy effective and consistent with national policy?**

6. The policy is unlikely to be effective due to the lack of accurate measurement of air quality for a number of developments near to the M5.
7. The NPPF (Para 186) requires that 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. So far as possible opportunities to improve air quality or mitigate impacts 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.