

## IL1- PROTECT

SANDWELL METROPOLITAN BOROUGH COUNCIL	
Public Health	
<b>FROM:</b> Public Health	<b>TO:</b> Regeneration and Economy
<b>Officer:</b> [REDACTED]	<b>FAO:</b> [REDACTED]
<b>REF:</b> MA49573	<b>REF:</b> DC/23/68822
<b>E-mail:</b> [REDACTED]	<b>DATE:</b> 18 December 2023

### TOWN & COUNTRY PLANNING ACT 1990:

### REPLY TO CONSULTATION - AIR QUALITY

**Proposal:** Proposed 150 dwellings, a countryside park and associated works (Outline application for access only).

**At:** Land Adjacent to Q3 Academy Wilderness Lane Great Barr Birmingham B43 7SD

**Application No:** DC/23/68822

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Further to your memorandum dated 21/11/2023 with reference to the above application I would like to make the following comments with regards to air quality.

### **DEVELOPMENT CLASSIFICATION**

The proposed residential site is categorised as a 'Medium Development', in accordance with the Black Country Air Quality SPD, which uses the DfT threshold criteria for Transport Assessments and Travel Plans (adapted for air quality purposes).

It is however acknowledged that the applicant has already identified and supplied relevant information relating to air quality including the following documents:

- **Air Quality Assessment** – October 2023
- **Transport Assessments 1 & 2** – October 2023
- **Framework Travel Plan** – October 2023

## **ASSESSMENT OF AIR QUALITY AT THE PROPOSED DEVELOPMENT SITE**

The quality assessment provided by BWB reports on the potential impact of the proposed development on existing sensitive receptors once the development is operational. Their assessment concludes in Section 7 that:

- *Road traffic emissions were modelled ... and concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> were predicted at identified receptor locations. ...The development was not predicted to result in any **new exceedances** of the current air quality objectives for England and the overall significance of the development on local air quality was predicted to be 'not significant' in accordance with IAQM and EPUK guidance.*
- *Overall the local air quality **impact** of the proposed scheme is considered to be not significant.*
- *Concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> were all predicted to be below the **current** relevant air quality objectives for England and therefore the site is considered to be suitable for the proposed residential use with regard to air quality.*


The conclusions in the air quality assessment are based only on the impact of this development, but do not acknowledge the existing high levels of PM<sub>2.5</sub> exposure that sensitive receptors are already experiencing. It is agreed that the construction of this development is unlikely to make these existing pollution concentrations worse, but we would be introducing a significant number of new sensitive receptors into an area where air quality is already poor. Furthermore, future modelling does not demonstrate that there will be any significant improvement in air quality i.e. PM<sub>2.5</sub> concentrations at this site. This raises concerns about the long-term suitability of this site for residential use when trying to meet both our interim and long-term air quality targets.

### **How will this development support the local authority in being able to meet our long-term air quality targets for PM<sub>2.5</sub>?**

- Air pollution is a serious public health issue, it increases morbidity and mortality from non-communicable cardiovascular and respiratory diseases; it also increases the disease burden from lower respiratory tract infections and increases preterm birth and other causes of death in children and infants.
- Even without development, the existing background levels of PM<sub>2.5</sub> at this proposed site are already high and have the potential to cause significant harm to health. When compared with the WHO air quality guidelines (based on public health impacts) that are set at 5 µg/m<sup>3</sup> for PM<sub>2.5</sub>, the model predicts annual exposure levels to PM<sub>2.5</sub> at sensitive receptor sites to be between **10.1µg/m<sup>3</sup>** and **12.2 µg/m<sup>3</sup>**. This is more than twice that of the WHO guidelines.

- The air quality assessment demonstrates compliance with **current annual PM<sub>2.5</sub> objectives** and suggests that air pollution is ‘not significant’ now and therefore this location is suitable for residential use. But as a local authority we have a duty under the Environment Act 2021, to make planning development decisions that ensure compliance with our future PM<sub>2.5</sub> targets. The PM<sub>2.5</sub> targets are set at **10 µg/m<sup>3</sup>** by 2040, with an interim target of **12 µg/m<sup>3</sup>** by 2028 as well as demonstrating a population exposure reduction of **35% by 2040**. As a local authority we are also accountable to the Office for Environmental Protection to demonstrate that we are making decisions that support these long-term air quality goals.
- This proposal does not conform to the National Planning Policy Framework (NPPF) in terms of air quality as this development would not be an effective use of land to meet the need for homes whilst **“safeguarding and improving the environment and ensuring healthy living conditions are promoted”** (paragraph 119).
- The NPPF also states that **“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions...”** (paragraph 185).

Given the existing high background levels of PM<sub>2.5</sub> already in this area I would therefore recommend that without suitable measures to mitigate the impact of poor local air quality on future residents, this application should be refused.

  
**Senior Environmental Health Officer (Air Quality)**  
Pollution Control Team