

North Herts District Council Local Plan EIP Statement

Matter 21 Air Quality

Statement by Graveley Parish Council

17.3 Is Policy D4 justified and effective?

No.

1. Policy D4 only requires air pollution impact assessments in reference to the individual development under consideration and does not extend to local communities in the immediate vicinity.
2. The policy does not address the issue of the cumulative impact (as required in NPPF 120) on air quality of multiple developments in North Herts on villages such as Graveley, which are already subject to heavy traffic congestion and which given the level of development proposed is likely to increase significantly.
3. The policy also does not consider the impact of traffic congestion on air quality in the communities around Stevenage pursuant to the latter's adoption of a new mobility strategy entailing the suspension of Stevenage related AECOM recommended mitigations to improve road network capacity, pending their reassessment by Stevenage in light of their new policy (discussed in Matter 11).

The new strategy seeks to restrict the use of private cars within Stevenage and in order to do so proposes to allocate part of the existing roads for active forms of travel (walking / cycling). This policy however ignores the impact it will have on traffic entering Stevenage from outside Stevenage itself (56% of people employed in Stevenage live outside Stevenage) or the impact it will have on the communities in the immediate surrounding areas.

4. Graveley itself already experiences heavy congestion in the form of slow moving / queuing traffic through the village and beyond at and around peak travel times resulting in increasing air pollution (as well as noise and vibration). Cumulative development north of Stevenage at Baldock, Letchworth and Royston will significantly increase traffic flows through the Graveley (this will be discussed further under Matter 11) and could in the absence of appropriate mitigation be severe (ED38 paragraph 1.8.6 (page 11)) within the meaning of NPPF 32.

Air quality will also deteriorate as a result of increasing commercial traffic once the new employment areas to the north (BA10 NHDC LP) and south (EC1/4 Stevenage LP) of the village are up and running.

We understand from the Air Quality Matter 21 discussion that NHDC is undertaking Air Quality monitoring in 2018 in Graveley but clearly no consideration was given to the issue when NHDC took the decision to allocate NS1 as a potential development site or of the pivotal position of Graveley in the local road network. A subsequent exchange of e-mails indicates monitoring of air quality in Graveley commenced in 2017 but we were unable to verify this from the information presented in ED 62.

To adequately assess Air Quality requires monitoring for at least one year if not longer. From the description given by Mr Carr of the location of the monitor in Graveley it will not capture the impact of pollution on the "Walking Train" detailed below, particularly in respect of NO₂, which is very concerning.

The core of Graveley village lies in a hollow and therefore the nitrogen gases and particulate matter will tend to roll downhill into the hollow to concentrate their impact there. This is particularly concerning given that the car park of the George and Dragon pub which lies within the core of the village is also the starting point for the "Walking Train" for Primary / Junior School children attending Graveley School.

5. NHDC comments in ED14 (5.31, p69) that any increase in traffic volumes through the villages will need to be restricted to within their environmental capacity, but the policy would not appear to commit to reducing traffic congestion unless air pollution forces them to do so.

Also no explanation of how NHDC will ensure traffic volumes will be contained within their environmental capacity is suggested and it is doubtful that once development has taken place, given the constraints of the local road network, any effective mitigation can be put in place. This is clearly unacceptable and indeed conflicts with SP7 (a), point 3 "avoid placing unreasonable additional burdens on the existing community or existing infrastructure".

6. The Planning Practice Guidance notes that air quality may be relevant to a planning decision when the development would significantly affect traffic or introduce new point sources of air pollution.

Development of NS1 will result in a new source of air pollution and will significantly increase traffic volumes and affect the flow of traffic (this will be discussed further under Matter 11) as would the development at Chesfield proposed by Pigeon Developments. The latter development includes a proposed link road to Back Lane to facilitate access between North Road and Great Ashby (5,000 houses), which again is likely to result in further traffic congestion (to be discussed in Matter 11).

Development of NS1 could potentially result in the addition it is estimated of between 900 and 1,800 cars (1,700 to 3,400 if the HO3 site is included) accessing North Road, based on a multiple of between 1x and 2x the number of houses, creating a new and significant source traffic congestion and of air pollution.

The above taken together with development of the new Employment Area at EC1/4 and new Retail Store of up to 7,600m² trading floor space (TC11) locally will add further to traffic volumes and the level of air pollution, as will increasing traffic volumes through Graveley and on the A1(M) occasioned by development in Baldock, Letchworth and Royston.

7. It is clear that no recognition of Air Quality issues were taken into consideration by NHDC when drawing up its Local Plan and air quality has only become an issue following the Matter 17 Hearing.

Graveley Parish Council, February 2018.