

Matter 21 – Air Quality		
Action	Date on which Action Completed	Examination Doc Reference No.
<ul style="list-style-type: none"> NHDC to find air quality monitoring data for Graveley showing the position as it is now (if there is any data) 	Enclosed as Appendix M21-1	ED158
<ul style="list-style-type: none"> NHDC to publish an addendum to its Matter 21 Air Quality Statement clarifying that the tables are based upon air quality monitoring data from 2016 and earlier and explaining why the data from 2017 was not used (as this data is incomplete). 	Enclosed as Appendix M21-1	ED158
<ul style="list-style-type: none"> NHDC to prepare short report on access to the examination website from 31 Dec up until 23 January 2018, addressing the list of technical issues prepared by Ms Cottier. 	26/02/2018; Enclosed as Appendix M21-2	ED113
<ul style="list-style-type: none"> NHDC to (1) replace the word “unsustainable” within its proposed amendment to Policy D4 with the word “unacceptable” and (2) to give some thought as to whether the supporting text should explain that the purpose of the final paragraph of the policy is to capture developments where it would be unreasonable to require an air pollution impact assessment. 	MM150 MM154	
<ul style="list-style-type: none"> NHDC to request a transcript from ESP Sound Systems of the discussion about disclosable pecuniary interests and provide the Inspector with a written transcript. 	Enclosed Appendix M21-3	ED158
<ul style="list-style-type: none"> NHDC to respond to Matter 21 statements submitted by Representors <p>[Note: This action not included on published lists on website]</p>	Enclosed as Appendix M21-4	ED158

Appendix M21 – 1

ED158 : NHDC Matter 21 Air Quality Statement Addendum and Errata



An Overview of Local Air Quality in the District of North
Hertfordshire

Errata and Addendum
to the
January 2018
Statement to Support the North Hertfordshire District
Council Local Plan 2011-2031

DOCUMENT INFORMATION

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5.7 LOCAL AIR QUALITY MONITORING DATA IN GRAVELEY 1

Figures

Figure 5.7 NHDC Air Quality Monitoring Network (historical & current) in Graveley 2

Tables

Table 5.7.1 Results from the Historical and the Active Air Quality Monitoring Network in Graveley 3

ERRATA

- i. These errata, (iii) and (iv), relate to the document An Overview of Local Air Quality in the District of North Hertfordshire – Statement to Support the North Hertfordshire District Council Local Plan 2011-2031, dated January 2018.
- ii. These errata, (iii) and (iv), were requested following the Examination hearing session held on the 23rd January 2018 which addressed Matter 21, Statement of North Hertfordshire District Council on Air Quality.
- iii. The final column of Table 5.1.2 on page 12 should be headed **AQO Breach 2016**, rather than simply AQO breach.
- iv. The final column of Table 5.3.1 on page 23 should be headed **AQO Exceeded 2016**, rather than simply AQO exceeded.

ADDENDUM

- a. This addendum relates to the document An Overview of Local Air Quality in the District of North Hertfordshire – Statement to Support the North Hertfordshire District Council Local Plan 2011-2031, dated January 2018.
- b. This addendum has been prepared following Examination hearing session held on the 23rd January 2018 which addressed Matter 21, Statement of North Hertfordshire District Council on Air Quality. At this hearing a request was made for North Hertfordshire District Council to provide local air quality monitoring data that are of relevance to the village of Graveley.
- c. These data have been collated and have been presented in this addendum in the same format as the data from other areas of the District of North Hertfordshire were presented in the Overview of Local Air Quality Statement, dated January 2018.
- d. As this document is merely an Addendum the information included is restricted to that relevant to the air quality monitoring undertaken in Graveley and the results arising from it in relation to the relevant Air Quality Objectives. For background information or wider context to the content of this Addendum reference should be made to the Overview of Local Air Quality Statement (January 2018).

5.7 Local Air Quality Monitoring Data in Graveley

5.40 Figure 5.7 shows the location of the one diffusion tube making up the air quality monitoring network in Graveley. Also shown in Figure 5.7 is the location of diffusion tube air quality monitoring point that was used in the past.

5.41 Within Table 5.7.1 the results from the currently active and historical air quality monitoring points are displayed as mean annual averages for nitrogen dioxide. These are displayed alongside the relevant Air Quality Objective.

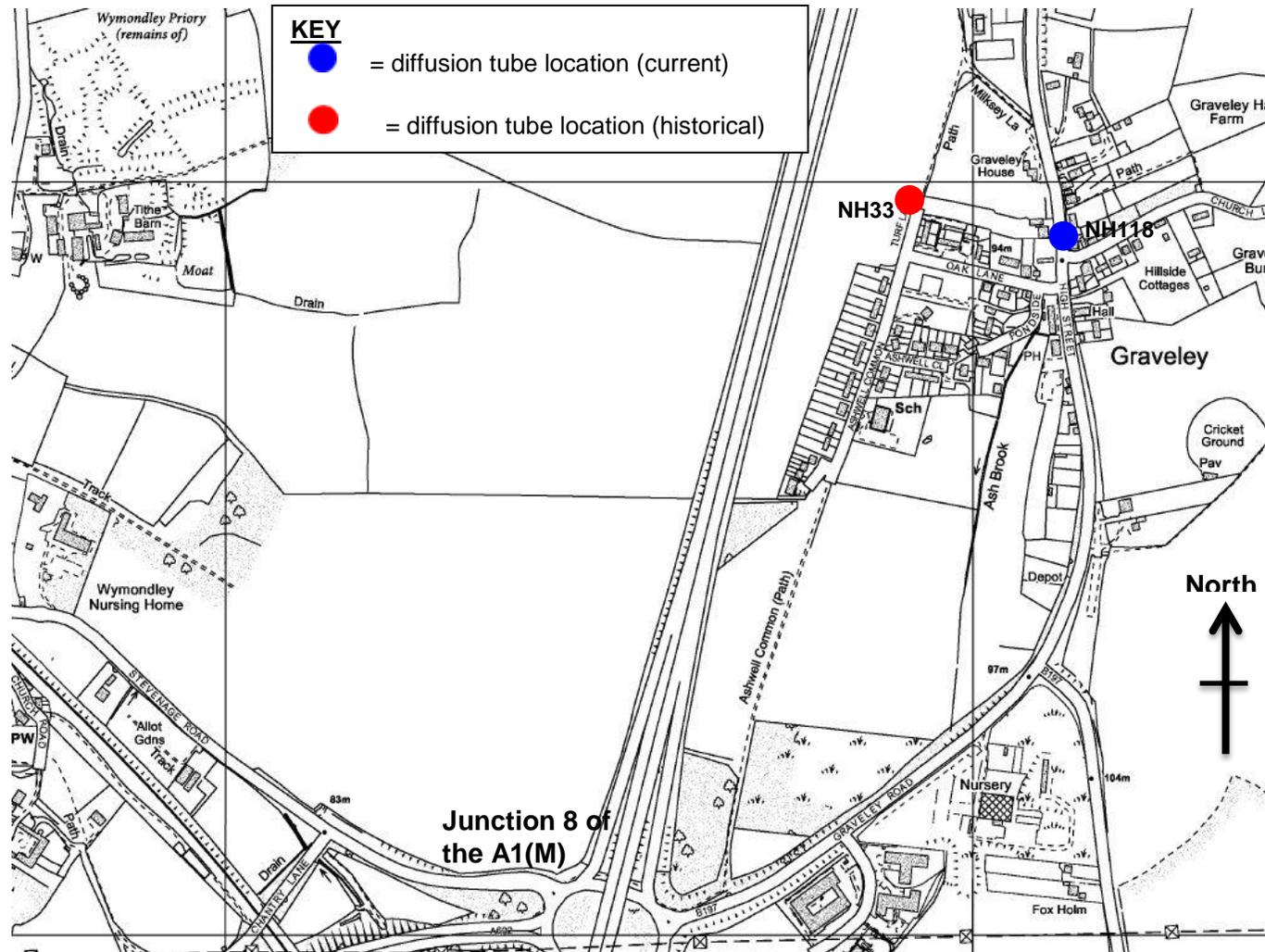


Figure 5.7 NHDC Air Quality Monitoring Network (historical and current) in Graveley

Table 5.7.1 Results from the Historical and Active Air Quality Monitoring Network in Graveley

Site ID	Historical Diffusion Tube Location	Mean Annual Average Concentrations ($\mu\text{g}/\text{m}^3$) by year						Air Quality Objectives NO_2	AQO Exceeded in monitoring period
		2004	2005	2006	2007	2008	2017	annual mean	
NH33	Turf Lane, Graveley	20.4	26.7	23.1	24.6	27.0	No Data	40	NO
Site ID	Active Diffusion Tube Location	2004	2005	2006	2007	2008	2017	annual mean	
NH118	High Street, Graveley	No Data	No Data	No Data	No Data	No Data	21.3	40	NO

5.42 Table 5.7.1 shows that the Air Quality Objective for nitrogen dioxide has not historically and is not currently being exceeded within the village of Graveley. Therefore, it can be concluded that there is no nitrogen dioxide air pollution problem impacting Graveley.

5.4.3 The local air quality monitoring available for Graveley does not alter the situation described in paragraph 6.1 of the Summary Section of the Overview of Local Air Quality Statement, dated January 2018. Namely that the only area of North Hertfordshire where an Air Quality Objective, specifically the annual mean average for nitrogen dioxide, has been exceeded at relevant receptors is in Hitchin along a stretch of the Stevenage Road and in the immediate vicinity of the Payne’s Park roundabout.

Appendix M21 – 2

ED113 : NHDC response to Ms Carolyn Cottier re access to the website

NORTH HERTFORDSHIRE DISTRICT COUNCIL

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23 February 2018

Ms Carolyn Cottier

Our Ref:

Your Ref:

By email

Contact Officer: Clare Skeels

Direct Line: 01462 474424

E-mail: Clare.skeels@north-herts.gov.uk

Dear Ms Cottier,

Availability of NHDC data - Letter to Inspector

I refer to your letter of 19 January addressed to Mr Simon Berkeley about data availability from NHDC through the www.data.gov.uk website.

We have investigated the availability of data for North Hertfordshire both through the Council's own website and the data.gov.uk website.

The data.gov.uk website does not host data files, it only provides the links to the Council's own website. It would appear that the links may have broken to the Council's website, but when we checked with data.gov.uk, they were all working. The Council is not aware of any problems with the NHDC website during the period specified in your letter.

All of the data and evidence that has been prepared in support of the Local Plan has been on the website since the submission of the Local Plan to the Secretary of State last year.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Clare Skeels'.

Clare Skeels
Senior Planning Officer

Appendix M21 – 3

ED158 : Transcript of discussion in relation to disclosable pecuniary interests

NHDC Local Plan Examination Hearing Sessions

ED158 : Appendix M21 – 3

Transcript of discussion about disclosable pecuniary interest – Tuesday 23 January 2018

Simon Berkley – Planning Inspector

Suzanne Ornsby QC – Barrister representing the Council

Ms Cottier – Participant at examination

Mr Hawkins – Participant at examination

Simon Berkeley – It is half past three and so I resume the hearing, I have read the correspondence that you have put in Ms Cottier and thought it might be helpful to discuss it just to be sure I understand it fully. I am looking in particular at the Declaration of Common Ground and Complaint and associated correspondence; if you could just very briefly explain it to me just to be sure I am clear in my mind.

Ms Cottier - so that's a Declaration of Common Ground so that all the people that have signed it are dissatisfied that they have been given a fair consultation process and that we are examining what could be called a legally signed off examination library because the person who signed it off had 2 undeclarable pecuniary interests, and that was a point I raised earlier on in a statement and it had been addressed very briefly by the Council. However, not to my satisfaction and at that point further information was sent to me by the Monitoring Officer inside North Herts and I had time to analyse that more closely and also have further corresponded with the Monitoring Officer.

And I had additional correspondence from the Legal Advisor this week which was not in the 53 page report because it came in the day I sent that. They left it until the very last minute and I have since had more correspondence with them and I am absolutely now very concerned as they don't seem to understand what's written in the Localism Act and it is really quite clear what is written in the Localism Act and the Appendix A attached to the Localism Act. To define what is meant by Beneficiary and what is meant by Director and what is meant by Shareholding are all crystal clear and everything aligns with everything else. The Localism Act aligns with the Council's own Code of Conduct, the Constitution and also Appendix A. Everything aligns quite perfectly. The only thing that doesn't seem to align is the reality of the declaration or not lack of it, therefore, and also the response from the legal team who think telling me it was an error is sufficient. That's basically it, I have written everything in the report I have a couple of further email correspondences and from my point of view it is not a legally signed library. The person who signed it was at that point breaking the law and had been because they were in an unlawful status, therefore to say that I am examining a legally signed document is not so because it could have been signed by Mickey Mouse or somebody else and its not legal if its not been signed legally it is not a legally signed examination library, that's my argument.

And I can't really say anymore than that other than what's written in the law and what has actually happened differs.

Simon Berkeley - That clarification does confirm in mind I have read it correctly what you have put in correspondence. Mrs St John Howe has had a discussion with you earlier on today and I confirm that what she has said to you is correct, it is not an area that I can get involved in but a conduct issue if I can phrase it that way. I understand the link that you make but it is not something directly about the soundness of the Plan. It is not something that is encompassed by the scope of my appointment. I know that is going to be disappointing to you but it is simply something that I have no jurisdiction over at all.

Ms Cottier - OK I just wanted to let you know about it because it was important and it was the right time to inform you. If it were my decision I would not look at it quite that way but it's not my decision. I didn't want to deprive you of the information should it rear its ugly head at a later stage so at least now you are in full possession of it and wherever it goes from here it goes from here. I do think it affects the soundness, because who signs the document signs off a document, or any stage of the regulatory stages that a document must pass through, are only allowed to do so based upon having certain powers and those powers don't exist in a vacuum, they are based in honouring ones contract and powers to act rest upon and if any of those foundations have been broken and it enters into the grounds of unlawful a signature of that person is based on the signature itself is unlawful and this is my stance on the matter.

I do think it affects the soundness of the plan because I feel it's been a huge breach of trust and it is very clear written on the document what's expected, but that has been completely ignored. I am not so much disappointed, I didn't expect anything other that what's taken place and everything like that. I just wanted to inform everyone at this as part of process I must go through as part of the process I must go through so I've checked the box.

Simon Berkeley - is there anything to add from the Council?

Suzanne Ornsby - yes bearing in mind proceedings are recorded it is my understanding that Ms Cottier raised informally with the Monitoring Officer an issue in respect of whether a councillor had properly notified the Monitoring Officer of a disclosable pecuniary interest. The Monitoring Officer informed Ms Cottier that the way to deal with this was to make a formal complaint to the Monitoring Officer which she has declined to do. As a result the Monitoring Officer herself decided to deal with the matter under the Council's complaint handling arrangements. The matter has been investigated and a conclusion reached following the detailed consideration by the Monitoring Officer and an independent person who is a Magistrate.

The upshot of that is that a letter has been sent by the Monitoring Officer on a confidential basis to the Councillor concerned, saying having looked at the matter and all points raised by Ms Cottier, there is no case to answer. The matter has been investigated; an independent person has overseen the investigation as to whether the Councillor had failed to disclose a pecuniary interest. The upshot is that there is no case to answer. You are absolutely right that this is a matter that is not really within your remit at all and if Ms Cottier is concerned that a councillor has failed to disclose a pecuniary interest then she must make a complaint to the Monitoring Officer and it will be done through the processes to deal with that complaint and that is the process she must adopt. I would suggest it not appropriate for you Sir as part of this process to be undertaking an investigation.

There is a remedy, she has declined to do so, but if she wishes to do so she can do so.

Simon Berkeley - What is a Monitoring officer?

Suzanne Ornsby - It is the officer appointed by the Council essentially to oversee the councillors and the way they conduct themselves in public office.

Mr Hawkins There is one question that should be asked.

Simon Berkeley by who of whom?

Mr Hawkins - By the general public, the scenario that appears as a result of what has happened, one of the dormant companies is New Garden City Company Ltd the fact is it quite possible that there was one consideration within NHDC to form a company of that name at some stage, but that has not been made clear to us, but the reality is that the councillor in question is involved with both the Local Plan and has also formed this business and from a public perspective the idea of a New Garden City has blown hot and cold for so long around North Herts. I can imagine the embarrassment that might be there, if a company had been registered by NHDC.

Suzanne Ornsby - I can assure Mr Hawkins that there is no embarrassment on behalf of the Council or indeed of any councillors concerned. The matter that has been raised has been investigated by the Monitoring Officers and an independent person who is a magistrate and there has been found to be no case to answer and if Mr Hawkins wishes to pursue that with the Monitoring Officer he is at liberty to do so.

Ms Cottier - I think we should use the word fully investigated in the loosest possible sense, Jeannette Thompson, she the legal advisor, has no idea what is written in the Localism Act, Section 31-34 she clearly has not read them because she seemed to think this could be explained away by saying 'well it was an error' and even though it's written on the very form signed what is a declarable pecuniary interest. But somehow for 4 years the person managed to sign the form ignoring what was written on the form in black and white, she also seems to excuse it by saying 'well it was dormant company' but that is not mentioned as one of the criteria for having a declarable pecuniary interest it says only that the person has to have had their share value more than £25,000 or and that's the thing or 100% of the shareholding of the company. So it has been explained away by things by that are not even in the legislation itself or on the form, so I absolutely don't accept its been fully investigated and the part about being invited to put in a complaint about it, they were very clear already at that point what had happened and according to the descriptions of their duties in, I think it's the Housing and Planning Act, the Monitoring Officer, if she thinks there might have been a contravention there are things they have to do immediately. They didn't need me to tell them it was already there written and they were already aware of what possibly had occurred. They didn't need me to put in a formal complaint to do that because it had already become evident so I declined to make a complaint I felt why should I spend more hours of my time clearing up more mess when it's perfectly obvious what has occurred here and they should be well aware of the law and I didn't want explicitly tell them the law because I wanted to see if they themselves were aware of it and in doing so it transpired they were not.

Suzanne Ornsby - Ms Cottier needs to tread very carefully here because she is making extremely serious allegations she is declining to lodge a complaint with the Council along the lines of what she is suggesting.

The Council has taken it upon itself to investigate these matters with an independent person and there is no case to answer. It is an abuse of this examination process for her now to be seeking to raise these matters and there is an appropriate course of action she can take. The short point is that it is not a matter for you Sir. If she remains unsatisfied in respect of the way this matter has been dealt with there are processes in place if Ms Cottier wishes to pursue for her to do so.

Simon Berkeley - I am going to draw a line under that and the reason is there is nothing I have heard and nothing to persuade me that it falls within the scope of my appointment to this examination and that it is not any of my business.

Suzanne Ornsby - Can I suggest the documentation provided is returned to Ms Cottier.

Simon Berkeley - It will have to be returned because anything I receive has to become an examination document and therefore in the public domain through me. Mrs St John Howe to return all documents to Ms Cottier. I make it 3.39pm and will resume this hearing tomorrow morning at 9am.

Appendix M21 – 4

ED158 : NHDC response to representations on air quality received following Matter 21 Hearing Session



North Hertfordshire District Council

**Statement in Response to the Post-Examination in
Public Representations**

April 2018

Statement to Support the North Hertfordshire District
Council Local Plan 2011-2031

DOCUMENT INFORMATION

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1 INTRODUCTION

- 1.1 This is a statement in response to the representations relating to local air quality that were received following the air quality session held on 23 January 2018 at the Examination in Public of the NHDC Local Plan 2011-2031.
- 1.2 For ease of reference and to avoid duplication this statement addresses the representations as they relate to geographical locations.
- 1.3 This statement should be read in conjunction with the following two documents already submitted by NHDC:
- An Overview of Local Air Quality in the District of North Hertfordshire: Statement to Support the North Hertfordshire District Council Local Plan 2011-2031. (January 2018). This document is referred to as **Reference 1** throughout the rest of this statement.
 - Errata and Addendum to the January 2018 Statement to Support the North Hertfordshire District Council Local Plan 2011-2031. (April 2018). This document is referred to as **Reference 9** throughout the rest of this statement.

Where it is of use in addressing the representations reference is made to these two documents.

2 HITCHIN

- 2.1 One representation, number 11151, made by Bill Sellicks made specific reference to the impact on air quality local to Hitchin.
- 2.2 Three key points are identified within this representation.
- 2.3 Referring to a comment made by Mr Couper, Mr Sellick is concerned that NHDC's Local Plan does not fully take into account the impact of significant developments beyond its borders on Hitchin's Air Quality Management Areas.
- 2.3.1 NHDC is aware of the air quality issues that arise in Hitchin and removed the Priory Fields, Hitchin site from consideration within the Local Plan because of its awareness of the air quality issues in and around the two Hitchin Air Quality Management Areas.

2.3.2 The Air Quality Policy (Policy D4) and the Air Quality Planning Guidance document that is in place to support that Policy have been written to enable the cumulative impact of developments on local air quality to be addressed. It is not anticipated that development outside the administrative boundaries of North Hertfordshire will have an adverse impact upon the Hitchin AQMAs, provided that they are appropriately designed with appropriate mitigation to address local air pollution issues. Additionally partnership arrangements relating to development specific air quality issues are in place between Luton BC and North Hertfordshire.

2.4 Mr Sellick contends that the Air Quality Policy is not robust enough.

2.4.1 This is not accepted it is considered that the Air Quality policy in the local plan is robust. Indeed, unlike a number of Hertfordshire local authorities NHDC has a standalone Air Quality Policy and supporting Air Quality Planning Guidance Document and these are considered to be as robust as can be found in any Local Plan in England.

2.5 Mr Sellick contends that the Air Quality Policy should have:

- A commitment to partnership work with Luton Borough Council and Luton Airport
- A commitment to reduce the number of private car journeys through the AQMAs in Hitchin

2.5.1 These are not considered to be commitments appropriate for a Local Plan Air Quality Policy. However, it should be noted that:

- Partnership working arrangements are already in place with Luton Borough Council and Luton Airport. An initial meeting between environmental officers from NHDC, Luton Borough Council and Central Bedfordshire Council and the environmental consultants engaged by Luton Airport has recently taken place in April 2018.
- The commitment to reduce private car journeys through the AQMAs in Hitchin is something that is best suited to the Action Plan that is in place pursuant to Part IV of the Environment Act 1990 than a District-wide Air Quality Policy within a Local Plan.

3 LETCHWORTH GARDEN CITY

3.1 One representation, number 3310, made by Gemma O'Neill included one question

about air quality in Letchworth.

3.2 Why no monitoring in Letchworth?

3.2.1 Section 5.2 of **Reference 1** provides the evidence for the absence of air quality monitoring in Letchworth.

3.2.2 For clarity the historical air quality monitoring demonstrates that there is no likelihood of an Air Quality Objective being breached within Letchworth and therefore it was decided to discontinue the monitoring.

4 BALDOCK

4.1 Four representations made specific reference to concerns about local air quality in Baldock. The representations came from Dr A. Wheen (2423), John Gingell (13929), Paul Sinclair (14496) and Anne Sinclair (14785).

4.2 Eighteen key points are identified within those four representations.

4.3 Growth in population will lead to equivalent growth in traffic which will make air pollution levels considerably worse (2423 and 14785).

4.3.1 It is not accepted that a growth in population will necessarily lead to a worsening of air quality. In particular:

4.3.2 Defra projections are for continued fleet improvements in terms of cleaner emissions from exhausts & an increased proportion of ultra low emission vehicles & an increase in the proportion of petrol to diesel vehicles (**References 2 & 3**).

4.3.3 The Baldock developments include a relief road based on the need to address future congestion concerns, which should mitigate air pollution because exhaust emissions are typically greater in congested traffic than free-flowing traffic.

4.3.4 Air quality (reduced nitrogen dioxide) in Baldock, similar to trends across the rest of North Hertfordshire, has been improving for the last 8 years up to and including 2017 (**Reference 1**).

4.4 Nitrogen dioxide concentrations are not being monitored on Station Road, Baldock (2423).

4.4.1 There is no monitoring location on Station Road, Baldock. There is a degree

of judgement in the selection of monitoring locations because it is not possible to monitor at all potential points of interest. There is also a need to consider that availability of a suitable structure on which to install the diffusion tube. Since the development of the new housing completed in 2017 the suitability of a diffusion tube location on Station Road will be reviewed. The nearest diffusion tube to Station Road is tube NH59, which is located on Clothall Road, 45m to the south east of Station Road at the junction of Clothall Road, Station Road, Whitehorse Street and Royston Road. The data from NH59 can be found in Table 5.3.1 of **Reference 1**. The data shows a general reduction in nitrogen dioxide concentrations with concentrations since 2010 ranging from $32.2\mu\text{g}/\text{m}^3$ to $26.4\mu\text{g}/\text{m}^3$ that are considerably below the $40\mu\text{g}/\text{m}^3$ Air Quality Objective.

4.5 Particulates are not monitored in Baldock (2423).

4.5.1 There is no monitoring for particulate matter (PM) in Baldock. There is no 'affordable' and suitably reliable means of monitoring particulate matter across multiple locations. NHDC has established a PM_{10} and a $\text{PM}_{2.5}$ analyser within one of its two Air Quality Management Areas in an effort to determine what the worst case particulate matter concentrations are likely to be within North Hertfordshire. The results for both PM_{10} and $\text{PM}_{2.5}$ within the Stevenage Road Air Quality Management Area are below the relevant Air Quality Objective and this is considered to be the most heavily trafficked and congested road in a residential area within the District Therefore, it is judged that PM_{10} and $\text{PM}_{2.5}$ will not exceed health objectives in other towns.

4.6 Baldock North will raise air quality concerns that must be addressed (2423).

4.6.1 The view is that the development site will not result in unacceptable air quality issues and that the Air Quality Policy in the Local Plan and a supporting Planning Guidance Document, which require air pollution modelling to provide evidence as to whether a development is feasible and the imposition of planning conditions if permission is approved will help to mitigate any adverse impact. Alongside the ability to require mitigation associated with any permitted development, there is a gradual downward trend in air pollution concentrations across North Hertfordshire, including in the Baldock area. Furthermore, there is a growing confidence that road fleet renewal in terms of cleaner exhaust emissions and an increased proportion of low emission

vehicles in relation to petrol and diesel will reduce levels of air pollution (Reference 2 and Reference 3).

4.7 Dr When referenced measurements from diffusion tubes in Baldock being over the $40\mu\text{g}/\text{m}^3$ Air Quality Objective (2423).

4.7.1 This is not accepted. Dr When is misinterpreting the data. A comparison of a monthly average nitrogen dioxide concentration with an annual mean average nitrogen dioxide Air Quality Objective is not a valid comparison to make. Dr When should compare the data in Table 5.3.1 of **Reference 1** to the $40\mu\text{g}/\text{m}^3$ Air Quality Objective and also consider that data in the context of Section 3 of **Reference 1**. The data show that no Air Quality Objectives are exceeded in Baldock.

4.8 NHDC has not identified any measures specifically targeted at reducing $\text{PM}_{2.5}$ and by its own admission NHDC has no plans to reduce $\text{PM}_{2.5}$ emissions in Baldock (2423).

4.8.1 For the following reasons the measures identified by NHDC (& listed by Dr When in 2423) to target $\text{PM}_{2.5}$ are the only practical options in relation to the issue of population growth and any associated increase in traffic and particulate matter emissions, which is the issue in question in relation to the Local Plan Examination.

- Encouraging a move away from internal combustion engine vehicles to ultra low emission vehicles (ULEV) will reduce $\text{PM}_{2.5}$.
- Measures to reduce road travel altogether will reduce $\text{PM}_{2.5}$ emissions from brake and tyre wear and dust re-suspension.

In 2013 road transport was estimated to contribute 12% & 13% of European emissions of PM_{10} & $\text{PM}_{2.5}$ respectively (**Reference 4**). This compares to road transport contributing an estimated 44% of NO_x emissions in England (**Reference 5**). Furthermore, as much as 60-80% of the urban background $\text{PM}_{2.5}$ is derived from the regional background including organic particles, ammonium nitrate & ammonium sulphate (**Reference 5**). These figures illustrate that the main source of particulate matter pollution that the general public is exposed to does not originate from road transport, which means that the potential impact of the proposed developments and associated vehicle movements is expected to be negligible.

- 4.8.2 NHDC has not admitted that it has no plans. It is aiming to reduce PM_{2.5} emissions as a direct consequence of its plans to reduce nitrogen dioxide emissions.
- 4.9 The absence of air quality information at Station Road, Baldock means that the planning application flowchart can't be followed (2423).
- 4.9.1 The flowchart can be followed because there is air quality data available from around the area and air quality modelling (for example ADMS or AERMOD) are available to predict concentrations at relevant receptors regardless of the presence of actual monitoring points based on the air quality data that is available in an area.
- Air quality modelling is necessary because there are not enough resources anywhere in the world to monitor for air pollution at every potential location or receptor of concern.
- Air Quality modelling is the name given to the mathematical theory used to understand and predict how pollutants behave in the atmosphere. It is used to run scenarios, to test theories and to understand environmental impact under various emission rates, weather conditions and geographical and development scenarios. There are lots of different approaches and techniques, but the aim is the same, to make an assessment of pollution impact over a given area and time period using an existing data set.
- The advantages of modelling are that you can assess a completely hypothetical situation before it occurs and predict the outcomes of alternative situations.
- By running the air quality model using the data specific to the area of interest e.g. pollution emission rates from the type and size of the vehicle fleet in the area, the geographical setting, e.g. building heights, road widths, junctions etc and prevailing weather conditions, it is possible to run the model for a base year. A base year being a year for which there is actual monitoring data. The output of the model for the locations within the area where there is actual data can then be compared with the actual data to 'validate' or 'test' the output of the model. The performance of the model can then be fed back into the model either by way of adjusting input data or by applying a correction factor to the future year predictions that take account of the discrepancy between the modelled outcome for the base year and the measured concentrations.
- 4.10 Measurements carried out so far have identified areas of Baldock where levels are

above the safety limits (2423).

4.10.1 This is incorrect. As explained above a comparison of a monthly average nitrogen dioxide concentration with an annual mean average nitrogen dioxide Air Quality Objective is not a valid comparison to make. Dr When should compare the data in Table 5.3.1 of **Reference 1** to the $40\mu\text{g}/\text{m}^3$ Air Quality Objective and also consider that data in the context of Section 3 of **Reference 1**. In particular it should be noted that for an annual mean average Air Quality Objective to be exceeded it needs to be exceeded at a residential receptor. The data show that no Air Quality Objectives are exceeded in Baldock and these data and this conclusion has been reported to Defra on an annual basis.

4.11 Measurements in Baldock only look for nitrogen dioxide (2423).

4.11.1 Section 3 of **Reference 1** has explained why NHDC monitors for the air pollutants that it does and how its monitoring network meets and in terms of $\text{PM}_{2.5}$ monitoring exceeds the national requirements of a local authority.

4.12 Planners have very little information about current levels of air pollution (2423).

4.12.1 This is incorrect. **Reference 1** provides sufficient information on the current levels of air pollution in Baldock and an adequate indication of the recent trends in concentrations of air pollution.

4.13 Mr Gingell references asthma rates in Baldock in 1995 and founds many of his subsequent points on this basis including that the Baldock Bypass was responsible for a decline in asthma rate (13929).

4.13.1 The data provided are not sufficient to draw such detailed conclusions. Dr MacLusky's letter of 1995 (Appendix A of representation 13929) confirms as such with the following statement. 'I am sympathetic to your mission and am concerned that traffic and other types of pollution may be responsible for the near epidemic proportions of asthma cases which we see at the survey. However, unfortunately I do not have the wear with all to give you the information which you would like.'

4.13.2 The Baldock bypass was constructed between 2004 and 2006, with the road opening in March 2006. However, no correlation between traffic levels and asthma rates has been shown and if it had been causation would still need to be demonstrated. It is accepted that reducing traffic in any town will improve air quality, but to imply such a causative & direct link is misleading. For some

context it should be recognised that in July 2007 the ban on smoking in public places was introduced and there is no evidence presented by Mr Gingell around any other potentially relevant changes between 1995 and the present day.

- 4.13.3 The implication that a historical situation will be recreated in the future is also inappropriate because despite some over-estimation of the improvement in vehicle emissions the levels of pollution emitted by vehicles have reduced substantially since the 1990s **Reference 6 and Reference 7**.

- 4.14 Any pollution modelling undertaken now on Baldock will give a distorted picture because the bypass has taken traffic away from the town centre (13929).
 - 4.14.1 Any air pollution modelling carried out by specialist air quality consultants in support of planning applications will be based on current air quality measurements in order to provide a representative baseline of the current air quality situation in Baldock. A distorted picture would be provided if the air pollution modelling were based on anything other than current air quality data.

- 4.15 It is inconceivable that an Air Quality Management Area has not been declared in Baldock (13929).
 - 4.15.1 The air quality monitoring data do not provide the evidence that an Air Quality Management Area should be declared. This is demonstrated within Section 5.3 of **Reference 1**. For NHDC to declare an Air Quality Management Area without the necessary supporting evidence would be to act against its statutory duty.

- 4.16 Mr Gingell raises the question of the use of tighter limits than the Air Quality Objectives (13929).
 - 4.16.1 Local authorities are tasked with working towards Air Quality Objectives that are set by central government. To set and work to different Air Quality Objectives, whether more or less stringent, would not meet legal obligations nor would it be judged reasonable from a planning perspective.

- 4.17 Mr Gingell refers to NICE guidance and need for a central planning policy to reflect it and that it should have been known by NHDC (13929).

- 4.17.1 NHDC has an Air Quality Policy in its Local Plan and it is supported by a detailed Air Quality Planning Guidance Document (**Reference 7**) that covers most, if not all of the 'criteria', referred to by Mr Gingell.
- 4.17.2 The NHDC Environmental Protection and Housing Team responded to the survey that was circulated by NICE in February 2017 prior to the finalisation of the NICE Guidelines. Following on from that response and to coincide with the publication of the NICE Guidelines, David Carr (NHDC's Environmental Protection Officer) was invited by Public Health England to present at an East of England Public Health Education seminar on local policies to mitigate air pollution and promote healthy travel. The two presentations delivered as examples of best practice were titled:
- Air pollution mitigation and the planning regime
 - Working together on air quality – Public Health and Environmental Health

The former presentation focussed on the importance of having an Air Quality Policy within a Local Plan; specifically one that is supported by a guidance document and a means of responding to pre-application submissions, scoping reports and subsequent planning applications and discharge of condition applications.

In its guidance NICE states that, 'the recommendations in the guideline represent the view of NICE, arrived at after careful consideration of the evidence available. When exercising their judgement, professionals and practitioners are expected to take this guideline fully into account, alongside the individual needs, preferences and values of their patients or the people using their service. It is not mandatory to apply the recommendations'.

Nonetheless NHDC has applied the recommendations and although the Guidance is not specifically mentioned in the Local Plan it has, along with many other sources of air quality guidance and best practice, been applied in NHDC's approach to managing air quality in its District, both within the planning regime and the local air quality management regime.

4.18 It is suggested that the Local Plan is lazy and reactive when it comes to air pollution from traffic & shows a lack of awareness of the public health issue (13929).

- 4.18.1 The Local Plan has an Air Quality Policy and supporting planning guidance document that demonstrates that the NHDC Local Plan is fit for purpose and reflects the importance of the public health issue.

4.19 Mr Gingell refers to the action poised to be taken by Brussels against the UK government (13929).

4.19.1 It is important recognise that NHDC is not one of the 32 councils identified by Defra as failing in relation to the 'Brussels action'.

5 ASHWELL

5.1 One representation, number 43, made by John Hare, raised concerns about air quality in Ashwell arising from AS1

5.1.1 The scale of the development proposed by AS1 will not impact in an unacceptable manner on local air quality in Ashwell. Ashwell is a village that is not subjected to traffic levels comparable to the main population centres in North Hertfordshire.

6 CODICOTE

6.1 One representation, number 14383, made by Save Rural Codicote, raised concerns about air quality in Codicote and the lack of air quality monitoring.

6.1.1 Section 5.5 of **Reference 1** shows that there is air monitoring within Codicote and that the local air quality in Codicote is not at risk of reaching or exceeding the relevant Air Quality Objective of $40\mu\text{g}/\text{m}^3$. The 2017 mean annual average nitrogen dioxide concentration measured on the Codicote High Street was $26.1\mu\text{g}/\text{m}^3$. This concentration was arrived at following application of the bias adjustment factor that was not available in January 2018 when **Reference 1** was published.

7 GRAVELEY

7.1 One representation, number 3427, made by Graveley Parish Council raised concerns about the air quality local to Graveley.

7.2 Six key points are identified within that one representation.

7.3 Policy D4 doesn't require Air Quality Assessments to look beyond the development itself.

7.3.1 In requiring Air Quality Assessments for major developments the Policy does require consideration of air quality impacts beyond the development itself,

because that is exactly what Air Quality Assessments are designed to consider.

7.4 The Policy does not address cumulative impact.

7.4.1 The Policy does address cumulative impact. Paragraph 9.27 of the text supporting Policy D4 specifically refers to cumulative impact and the supporting Air Quality Planning Guidance Document referred to in Paragraphs 9.35 and 9.37 of the same supporting text has been prepared specifically to address the cumulative impact of developments (**Reference 8**).

7.5 Air quality will deteriorate as a result of increased traffic from developments in the vicinity of Graveley.

7.5.1 An increase, on current levels, in air pollution at time of completion of the proposed developments does not automatically follow because of improvements in vehicle emissions & the changing composition of the vehicle fleet. Even if air pollution does worsen this does not mean that the air quality objectives will not be met. On the basis of the current data it is considered that the air quality objectives will not be breached. The scale of any increase in relation to the Air Quality Objectives and the previous levels of air pollution, as well as the increase in relation to the presence of receptors will define this. It is the role of the planning regime to deal with this & NHDC is well placed to manage this issue via that regime because it has an Air Quality Policy and supporting Air Quality Planning Guidance Document.

7.6 There was no mention of Graveley in ED62.

7.6.1 There was no mention of Graveley in ED62 because the report that was requested by the Inspector identified key areas of the District to be considered. Graveley was not one of those areas. Following the hearing day on the 23rd January an Addendum to Appendix A of ED62 was prepared which included air quality data for Graveley. This Addendum is **Reference 9** and has since been submitted to the Inspector. The annual mean average nitrogen dioxide concentration measured in 2017 was $21.3\mu\text{g}/\text{m}^3$ and so is considerably below the $40\mu\text{g}/\text{m}^3$ Air Quality Objective and so not indicative of a local air pollution problem.

- 7.7 Graveley Parish Council refers to correspondence & concludes that the existing monitoring location will not capture a particular impact of pollution.
- 7.7.1 NHDC considers that the monitoring location (NH118) will be measuring nitrogen dioxide concentrations that are sufficiently representative of the Graveley. For clarity and to avoid the potential for the correspondence that has been referred to being misinterpreted it is attached to this response at the end.
- 7.8 It is clear that no recognition of Air Quality issues was taken into consideration by NHDC when drawing up its Local Plan.
- 7.8.1 The Environmental Protection and Housing Team were consulted by the Planning Team responsible for preparing the Local Plan during the consideration of the preferred sites and comprehensive local air quality data was available throughout that period of consultation, as has been demonstrated by **Reference 1**.

8 ICKLEFORD

- 8.1 One representation, number 9806, made by Ickleford Parish Council raised concerns about the air quality local to Ickleford.
- 8.2 Four key points are identified within that one representation.
- 8.3 Defra background mapping shows a 'hot spot' for nitrogen dioxide & NO_x.
- 8.3.1 The mean average background concentration for nitrogen dioxide is relevant in terms of assessing potential exposure against the 40µg/m³ Air Quality Objective. The estimated concentration (between 20µg/m³ and 30µg/m³) is half the 40µg/m³ at its conservative end & three-quarters at the worst case end of the range. Both represent concentrations that are sufficiently low that the Air Quality Objective would not be expected to be exceeded at a relevant receptor, because levels of traffic and congestion are not expected to add sufficient concentrations of pollutant to that background. This is elaborated on further in paragraph 8.4.1.
- 8.4 NHDC appears manifestly unaware of these traffic and air quality issues in Ickleford.

8.4.1 There has never been any air quality monitoring in Ickleford. For context the volume of traffic in Ickleford referenced in the **9806** submission is compared against the volume of traffic along Hertfordshire County Council's programmed vehicle survey point on Turnpike Lane, Ickleford and the Department for Transport traffic count locations at Stevenage Rd, within the Air Quality Management Area & at Upper Tilehouse Street, which is one of three roads feeding into the Payne's Park Air Quality Management Area.

Ickleford (AAWD):

2010 Bedford Rd (south) Hitchin/Ickleford = 6,343

2010 Arlesey Rd (south-west) Ickleford = 4,746

2010 Turnpike Lane, Ickleford = 7,447 (source:

<http://webmaps.hertfordshire.gov.uk/highwayspub/index.htm?layers=%5B5:15,18%5D>)

Hitchin (AAWD):

2010 Stevenage Rd, Hitchin = **32,353**

2010 Upper Tilehouse St, Hitchin = **21,636**

(Source: <http://www.dft.gov.uk/traffic-counts/cp.php?la=Hertfordshire>)

The traffic count information demonstrates how much greater the volume of traffic is within the roads at the Hitchin Air Quality Management Areas compared to the roads in Ickleford. This is of relevance because it is the road traffic that provides the local source of air pollutants, which very simplistically, if added to the Defra modelled background concentrations, would be responsible for an Air Quality Objective being breached.

A 2015 count is the most up to date available for Ickleford and is only available at Turnpike Lane, it recorded an AAWD of 7097 vehicles. The comparable counts for Stevenage Road and Upper Tilehouse Street in 2015 were 35,784 vehicles and 22,176 vehicles respectively.

8.5 There is nothing in the Local Plan which might mitigate against air quality in Ickleford.

8.5.1 NHDC has an Air Quality Policy in the Local Plan & a supporting Air Quality Planning Guidance document, which can require air pollution modelling & enables the imposition of planning conditions to ensure that measures are put in place if there are any air quality concerns that may result from development. However based on the current data it is not anticipated that the

current air quality in Ickleford will materially deteriorate as a result of the local plan allocations.

8.6 The Local Plan fails to consider cumulative impacts.

8.6.1 NHDC has an Air Quality Policy in the Local Plan & a supporting Air Quality Planning Guidance document that has been prepared specifically to enable NHDC to address the cumulative impact of developments.

9 WYMONDLEY

9.1 One representation, number 13237, made on behalf of Wymondley Parish Council raised concerns about the air quality local to Wymondley.

9.2 Three key points are identified within that one representation.

9.3 The Local Plan should have been supported by an air quality impact assessment.

9.3.1 This was judged not to be a practical option in terms of what the air quality monitoring data is showing in terms of concentrations and trends in air pollutant levels across the District. Furthermore, it is the role of the Development Control regime to address individual applications and their cumulative impact in relation to other proposed or permitted developments. It is the role of the Local Plan to facilitate this by way of an appropriate Air Quality Policy. NHDC has such a Policy within its Local Plan and it is supported by a detailed Air Quality Planning Guidance document that makes it clear to individual applicants their obligations in bringing forward planning applications.

9.4 Air Quality data for Wymondley is only based on Defra modelled background data.

9.4.1 Defra background data was the only data available because the Wymondley area was not identified to be an area at risk from elevated levels of air pollution. Representation 13237 makes reference to nitrogen dioxide concentrations measured by Wymondley Parish Council that were submitted to NHDC. However, these data have not been received. Data from a NHDC diffusion tube at Stevenage Rd, Little Wymondley has measured $30.9\mu\text{g}/\text{m}^3$ (January 2018) and $19.4\mu\text{g}/\text{m}^3$ (February 2018) since it has been deployed. These results provide an indication that nitrogen dioxide

concentrations in Great Wymondley are not at a level that is close to the Air Quality Objective of $40\mu\text{g}/\text{m}^3$ and so not indicative of an air quality problem.

9.5 Appropriate air quality mitigation measures have not been identified and incorporated into the plan.

9.5.1 There are many air quality mitigation measures available that may or may not be applicable on a development by development basis. It is not practical to identify these within a Local Plan, however, Policy D4 has been prepared to ensure that applicants and developers consider and propose air quality mitigation measures when bringing forward their proposals wherever that is appropriate.

10 EAST OF LUTON

10.1 Fourteen representations made specific reference to concerns about local air quality in Luton and the surrounding area. The representations came from:

- | | |
|---------------------------------|-----------------------------|
| - Councillor Diane Moles (2677) | - Mr D F Parker (2717) |
| - Linda Cottier (3094) | - Mr Mike Dines (3107) |
| - Gemma O'Neill (3310) | - Ann Dainton (3640) |
| - Shirin Elliot (3762) | - Barry Brown (13865) |
| - Russell Shadbolt (14096) | - Barry Dainton (14138) |
| - Steve Hall (15891) | - S Tyler (16210) |
| - Carolyn Cottier (3072) | - Zade Cottier-Wood (16475) |

10.2 Ten key points are identified within the fourteen representations.

10.3 NHDC has not conducted air quality monitoring of the East of Luton area, both in terms of the east of the Luton Airport Runway and the EL1, EL2 and EL3 sites. (2677, 2717, 3310, 3640, 13865, 14096, 3072, 16475).

10.3.1 Section 5.6 of **Reference 1** demonstrates that NHDC has undertaken air quality monitoring in some areas located to the East of Luton. It also explains why air quality monitoring has not been deemed necessary in other areas.

10.3.2 However, because of the concern raised as a result of the Local Plan consultation process NHDC has established a diffusion tube monitoring location at Luton Road in Cockernhoe. In January 2018 a concentration of $33.8\mu\text{g}/\text{m}^3$ was recorded and in February 2018 a concentration of $17.9\mu\text{g}/\text{m}^3$ was measured, both concentrations are sufficiently below the $40\mu\text{g}/\text{m}^3$ Air

Quality Objective to provide some initial vindication of the decision not to undertake air quality monitoring in that area in the past.

10.3.3 The historical air quality monitoring undertaken immediately to the east of the Luton Airport runway can be found in Table 5.6.1 in **Reference 1** and demonstrates that the area was not subject to elevated levels of air pollution.

10.4 NHDC has not established a strategy and delivery plan to assess the impact of proposed development. (3094 and 13865).

10.4.1 NHDC has an Air Quality Policy within the Local Plan that is supported by an Air Quality Planning Guidance document and it has an established district wide air quality monitoring network.

10.5 NHDC is not fulfilling their statutory duty to comply with air pollution legislation (3094 and 13865)

10.5.1 NHDC is fulfilling its statutory duty, as has been demonstrated by **Reference 1** and by the fact that it meets its obligation to provide an annual air quality report to Defra. Additionally Air Quality Management Areas have been designated where needed and Action Plans prepared.

10.6 Plans are not sustainable as all the developments and their combined impacts will greatly increase pollution. (3094 and 13865).

10.6.1 An increase, on current levels, in air pollution at the time of completion of the proposed developments does not necessarily follow because of improvements in vehicle emissions & the changing composition of the vehicle fleet. Even if air pollution is predicted to get worse this does not necessarily preclude a development going ahead. The scale of the increase in relation to the air quality objective and the previous levels of air pollution, as well as the increase in relation to the presence of receptors will define this. On current data it is not anticipated that future development proposals at Luton will have a significant impact on air quality or breach air quality objectives on the East of Luton land.

However, it is the role of the planning regime to consider proposals for development on air quality and NHDC is well placed to do so because it has an Air Quality Policy and supporting Air Quality Planning Guidance document.

10.7 Linda Cottier quotes from Section 5.6 of **Reference 1** that there has been no monitoring of air quality historically'. (3094)

10.7.1 This is a misquotation. The relevant extract is from paragraph 5.32 within Section 5.6 and is included below.

5.32 There is currently no monitoring of air quality in the area of the district identified as the East of Luton. As reference 1 explains historically there were eight monitoring locations, of which seven were diffusion tubes and one was a site comprising two real-time analysers. The locations of the air quality monitoring points are shown in Figure 5.6.

10.8 Gemma O'Neill asks why there is no reference to 2017 data (presumably not just in relation to East of Luton). (3310).

10.8.1 Where monitoring was undertaken in 2017 it was reported in the Tables in **Reference 1**. However, at the time of publication of the Statement in January 2018 the data for December 2017 was not yet available and the data for the rest of that year was provisional i.e. it had not been ratified. Ratified air quality monitoring data typically only becomes available in March/April the following year.

10.9 Gemma O'Neill states that NHDC is admitting that housing would have a negative impact. (3310).

10.9.1 Gemma O'Neill misunderstands the reference to 'absence of housing' that she quotes. The reference to absence of housing relates to the fact that if housing were present within the airport boundary then that housing would be exposed to concentrations of air pollutants above the relevant Air Quality Objectives. It does not state that housing developments in the vicinity of the airport would have a negative impact on local air quality.

10.10 NHDC has failed to measure other air pollutants. (13865).

10.10.1 Section 3 of **Reference 1** explains that NHDC monitors for an appropriate range of air pollutants.

10.11 Barry Brown states that air pollution impact assessments are required and that there are duties on developers and mitigation is needed. (13865).

10.11.1 This is why NHDC has an Air Quality Policy within the Local Plan and why it is supported by an Air Quality Planning Guidance document.

11 GENERAL

11.1 One representation, number 16139, made by Ian Bowie was not specific to a particular area, although it did reference Knebworth.

11.2 Four key points are identified within the representation.

11.3 Concern is raised about the improper use of averages.

11.3.1 The reporting of the monitoring results follows the requirements and guidance of central government in assessing the impact of local air pollutants on human health. This guidance is scientifically robust, suitable for its purpose and accepted throughout the UK and Europe.

11.4 Concern is raised about where and when the air quality monitoring is taken.

11.4.1 The monitoring of air quality follows the requirements & guidance of central government in assessing local air pollution impact on human health. It is scientifically robust, suitable for its specific purpose & accepted across the UK & Europe. Details are specified in the annual reports to Defra that are found via <https://www.north-herts.gov.uk/home/environmental-health/pollution/air-quality/air-quality-reports>. **Reference 10** provides the fundamental guidance to local authorities on how to undertake local air quality monitoring.

11.5 Mr Bowie refers to the planning approach to air quality.

11.5.1 Mr Bowie references an out of date document (PPS23). NHDC considers that the approach that it has taken is correct and adequate.

11.6 Mr Bowie recommends Mid-Devon's approach to assessing the air quality impact of developments.

11.6.1 Mr Bowie is advised to read the NHDC Air Quality Planning Guidance document (**Reference 7**) that is referred to in the Local Plan Air Quality Policy supporting text. This is because it is a guidance document that is comparable, to Mid-Devon's and has been written specifically with North Hertfordshire in mind.

12 SUMMARY

12.1 The air quality evidence presented as part of the Local Plan examination process has been appropriately collected, analysed and presented and demonstrates that, with the exception of the two Air Quality Management Areas in Hitchin, North Hertfordshire does not suffer from unacceptable levels of air pollution. There is no evidence to justify

a concern that proposals for development in the Local Plan would have an unacceptable impact on air quality or breach air quality objectives, moreover the air quality policy in the plan will ensure this does not occur.

- 12.2 The air quality evidence presented as part of the Local Plan examination process demonstrates that since 2010 there has been a gradual improvement in air quality within North Hertfordshire, including within the Air Quality Management Areas.
- 12.3 The air quality monitoring has been taken into account in preparing the Local Plan.
- 12.4 NHDC has an Air Quality Policy within its Local Plan that is supported by an Air Quality Planning Guidance document, both of which are considered by NHDC to be fit for their stated purpose.

13 REFERENCES

Reference 1: An Overview of Local Air Quality in the District of North Hertfordshire: Statement to Support the North Hertfordshire District Council Local Plan 2011-2031. (January 2018) <https://www.north-herts.gov.uk/files/ed62-nhdc-matter-21-air-quality-statementpdf>

Reference 2: <https://laqm.defra.gov.uk/review-and-assessment/tools/emissions-factors-toolkit.html>

Reference 3: <http://www.aqconsultants.co.uk/News/January-2018/UPDATED-CURED-TO-V3A.aspx>

Reference 4: <http://www.eea.europa.eu/publications/lrtap-emission-inventory-report>

Reference 5: http://uk-air.defra.gov.uk/assets/documents/reports/cat11/1508060903_DEF-PB14161_Mitigation_of_UK_PM25.pdf

Reference 6: <https://www.eea.europa.eu/media/infographics/comparison-of-nox-emission-standards/view>

Reference 7: <http://www.acea.be/industry-topics/tag/category/euro-standards>

Reference 8: Appendix B of <https://www.north-herts.gov.uk/files/ed62-nhdc-matter-21-air-quality-statementpdf>

Reference 9: Errata and Addendum to the January 2018 Statement to Support the North Hertfordshire District Council Local Plan 2011-2031. (April 2018).

Reference 10: Local Air Quality Management Technical Guidance (TG16). Defra. (February 2018). <https://laqm.defra.gov.uk/technical-guidance/>

13 EMAIL CORRESPONDENCE REGARDING SECTION 7

From: David Carr
Sent: 09 February 2018 13:49
To:email address redacted.....
Cc: Shayne Crowe
Subject: RE: RE: Air Quality Monitoring in Graveley

Mr Rigg

- 1) There was no reference to Graveley in the Statement that was submitted to the Inspector on the 23rd January 2018 because we were instructed to produce a Statement specifically focussed on the areas of North Hertfordshire that were raised during the part of the examination in public that dealt with the Air Quality Policy on the 21st November 2017. Graveley was not one of those areas and this fact was mentioned in discussions during the examination in public on the 23rd January 2018.
- 2) Historical information will be submitted to the Inspector in response to the issues raised on the 23rd January 2018, which will include all of the available information from Graveley. It is my understanding that this will be made available to the public in the usual way.
- 3) The annual mean average for nitrogen dioxide measured at the current monitoring location in Graveley in 2017 was 22µg/m³. This is considerably lower than the Air Quality Objective for nitrogen dioxide of 40 µg/m³ and on this basis I am confident that on the same road, albeit on the opposite side and approximately 100m to the south, the concentrations of nitrogen dioxide will be very similar. I would, however, be happy to look for a suitable diffusion tube location closer to the area of your specific concern, with a view to relocating the current diffusion tube in Graveley to such a location, but this will be done for the start of 2019, not before.

For context, the roadside concentrations detected within the Stevenage Road, Hitchin Air Quality Management Area (AQMA) in 2017 were 49.7µg/m³, 51.1µg/m³, 55.9µg/m³, 44.6µg/m³, 44.7µg/m³, 39.8µg/m³ and 43.6µg/m³. It should be noted that even at those annual mean average concentrations our real-time analyser has never measured a breach of the 1-hour mean Air Quality Objective for nitrogen dioxide within the AQMA. Therefore, there is judged to be no likelihood of the 1-hour mean Air Quality Objective being breached on the High Street, Graveley.

In terms of sulphur dioxide I have included below the relevant extract from the Statement that was submitted to the inspector on the 23rd January 2018:

3.8 The other air pollutant that NHDC does not monitor for, but for which there is an Air Quality Objective is sulphur dioxide. NHDC does not monitor for sulphur dioxide because of the absence of any significant local sources of sulphur dioxide emissions in the district. In 2015, 54% of sulphur dioxide emissions were from energy production and transformation and 21% from manufacturing industries (Defra National Statistics Release: Emissions of air pollutants in the UK, 1970 to 2015).

I trust that the above information addresses the issues that you raised in your below email.

Regards
David Carr
[Environmental Protection Officer](#)

From:email address redacted.....
Sent: 09 February 2018 10:26
To: David Carr
Cc:
Subject: Re: RE: Air Quality Monitoring in Graveley
Dear Mr Carr,

Thank you for your mail, apologies for the delay in responding.

In reviewing the information submitted to the Inspector for the meeting on 23rd January I was unable to find any reference to Graveley.

Any available historical information would be useful but you should note that traffic volumes and queuing through Graveley has increased significantly over the last few years, often back past Jack's Hill to the waste disposal site.

As regards the location of the current monitor at 27 High Street, it is at least 100 meters beyond the start of the Walking Train departure point and will not capture the impact of the traffic pollution, particularly the 15 minute and one hour mean test for Sulphur Dioxide and one hour test for NO₂, which are so damaging to very young children.

Regards

J Rigg