JLP Councils response to Inspectors' note EXC14 re. air quality 16 March 2018

1. There are three Air Quality Management Areas within South Hams: the A38, Totnes and Ivybridge. Please show the location of these AQMAs on an OS base and map the locations of developments in the vicinity of the AQMAs from which more than 30% of traffic generated by the development is likely to pass through the AQMA. Developments should include completions, commitments and allocations for the period of the JLP 2014-2034.

   Please find accompanying this note a plan showing the Ivybridge (Western Road) AQMA and the Totnes AQMA with sites indicated as requested **(EXD49A and EXD49B).**

   For Ivybridge sites have been included to the centre and east of Ivybridge. Sites to the west of Ivybridge have not been included since there is a route to the A38 and other major destinations without passing through the AQMA. Consequently it is considered that less than 30% of the traffic generated by the respective developments would pass through the AQMA.

   For Totnes sites have been included where they are within or adjacent to the AQMA and there is no clear access / egress other than through AQMA. Sites to the west of Totnes and at Dartington Village have not been included since there is a route to the A38 and other major destinations without passing through the AQMA.

   The Dean Prior (A38) AQMA is considered to be outside the scope of the JLP since it would have a minimal impact on traffic travelling on the A38, at this location.

2. To what extent is traffic emissions identified as the reason for the designation of the AQMAs?

   The sole reason for all three designations has been assessed as being due to traffic emissions. There is no other known substantial source of pollution in any of these areas (specifically no industry).

   See answer to question 4 for the reasons for the designation of the AQMAs.

3. What Plans are in place to reduce levels of emissions in the AQMAs?

South Hams Council has an adopted Air Quality strategy that dates back to 2007 and an Air Quality Action Plan dated 2013. Copies of these documents are provided **(EXD49C and EXD49D).**

The Council has also revised its Air Quality Strategy and Action Plans following the amendment to the Totnes AQMA in 2016. This strategy (Clean Air Strategy) will be the subject of public consultation in April 2018. It has been produced in collaboration with Devon County Council.

Measures set out in the AQ Action Plan / Strategy and Clean Air Strategy have been incorporated in the JLP through Policies SPT1, SPT10, TTV25 (or as amended to be an objective), DEV2 and DEV31 (see EXC14) and related transport policies include SPT8, SPT9 and SPT10.

The TTV SPD will provide further clarification of how impact on AQMAs will be assessed and considered and the appropriate actions to address any impacts.

4. What are the latest monitoring results for traffic emissions in the three AQMAs, in particular levels of NO2?

South Hams District Council monitors Air Quality through the use of Nitrogen Dioxide (NO_2) diffusion tubes; and reports annually on the results in the Council's Annual Status Report. The 2017 Report accompanies this submission to the Inspectors **(EXD49E),** with the results located at pages 10 to 13 and a map of the monitoring locations shown within Appendix D. SHDC does not carry out any monitoring for any other pollutants.

The results indicate:

Marginal failure for NO_2 at Western Road
Marginal failure for NO_2 at Bridgetown Hill, Totnes
More substantial failure for NO_2 at True Street junction, Totnes

5. What forecasts are available of future traffic levels through the AQMAs during the period of the JLP? Do those forecasts look at traffic levels with and without the new developments identified in 1?

The Council has taken a strategic approach and has no forecasts.

Modelling is considered to be of limited value due to the complexity of development patterns in the area.

Instead, the approach is strategic with modelling undertaken for development through the development management process. This level of assessment is considered to be commensurate to the scope and detail of the JLP and is commensurate to the requirements of paragraph 124 of the NPPF.

DCC has undertaken monitoring of traffic trends in Totnes since 2005, which was before the western bypass was constructed and opened. This data is provided for the Inspectors **(EXD49F)**. The data indicates that traffic on the A385 and the Totnes cordon has stayed relatively constant or even dropped a little over recent years. This is corroborated by DfT data which indicates a reduction in traffic travelling through the AQMA.

A key reason is, and this is true for much of South Hams, that the road network capacity limits traffic – that is, where routes are unattractive the level of use is self-regulating at a constant level. There is some through traffic but it has multiple origins and destinations. Generally from the villages east and west of Totnes, with some from the major conurbation of Torbay.

The most likely scenario is that traffic will stay at a similar level to existing, with some additional traffic linked to development offset by changing travel patterns. It is considered that the high degree of self-containment (see T18A, paragraph 4.1.5); high number of self-employed workers, including many home workers (see T18A, paragraph 4.1.7); a culture of sustainability; and good cycle routes support this stability and provide a sound foundation for the successful implementation of the Clean Air Strategy.

6. Are there any forecasts available to assess future levels of traffic emissions, which would indicate the extent to which development which has been completed, committed or allocated in the Plan is likely to affect the emission levels in the AQMAs?

The Council does not undertake regular forecasting, we would expect air quality impact assessments to be based upon relevant modelling such as the DEFRA 2016 database.

The standard approach is an assumption that there will be an increase in ultra-low emission vehicles, hybrid vehicles and electric vehicles. The approach, therefore, is to promote the provision of infrastructure to support and promote take up of these technologies as well as enhancing public transport and improving provision of and access to cycle and footpaths. S106 Agreements typically require developers to give Sustainable Travel Vouchers to householders and that Green Travel Plans set out measures to further the objective of modal shift.

7. Would developments within the Plan period be likely to extend the boundary of any AQMA?

No, it is not likely that any of the AQMAs are extended

The reasons for the declaration of the larger area in Totnes was to allow a strategic response. Vulnerable properties are limited to True Street junction and a terrace of housing on Bridgetown Hill. Otherwise properties, including KEVICC (the secondary school) are set back from the road and fall outside the area where NO2 exceeds standards.

In Ivybridge the area of exceedance is similarly localised.

The clarity of where exceedance exists, its geographical limitation and ability to at least prevent a worsening of the exceedance is a further justification why it is considered to be a commensurate response to only forecast / model emissions for individual developments (including cumulative impact) as they are brought forward.

8. Having regard to the difference between factory measurements of vehicle emissions and real world driving conditions, what level of improvement in emissions is used in any forecasts carried out by the Councils?

The real world emissions are what has been measured to inform the designation of AQMAs.

Please refer to previous answers.