Call for Evidence: Air Pollution in England[1]

Community Planning Alliance Response

Question 4. Are the current national targets and performance for air pollution, such as those in the Air Quality Environment Act target delivery plan and the 10-year Health Plan, adequate, ambitious and wide-ranging enough to provide adequate protection for public health and the environment, and how do they compare with WHO recommendations?

a. What are the major barriers and/or challenges to achieving national targets on air quality?

We focus our response on the key barriers to achieving national targets on air quality.

Barrier 1: the lack of mandated schemes that will unambiguously deliver reduced air pollution.

The government's Public Health briefing (May 2016[2]) asserts that "*it has been estimated that half of the UK's £10bn cost per annum of air pollution comes from road transport*". Yet sustainable passenger and freight transport options are **STILL** being overlooked in favour of increasing road capacity.

The government **MUST** secure the change needed to ensure that **ONLY** the most sustainable transport options are funded by the public purse.

Barrier 2: the unmitigated lack of compliance with existing planning policy

The National Planning Policy Framework[3] (NPPF) requires that planning policies and decisions should ensure (paragraph 198) "*that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development"* and should (paragraph 199) "*sustain and contribute towards compliance with relevant limit values or national objectives for pollutants",* suggesting that planning authorities should identify opportunities to improve air quality or mitigate the impact of development.

These policies are being disregarded when plans are being made or planning applications are being decided. The focus for planning authorities is solely on achieving the government's house building targets, meaning that, of the three sustainability pillars set out in the NPPF (economic, social and environmental), only policies relating to economic growth are being considered, with other policies going unheeded.

In addition, NPPF paragraph 96 suggests that planning policies and decisions should aim to achieve healthy, inclusive and safe places which (c) "*enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities*".

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1 https://committees.parliament.uk/call-for-evidence/3836/

2 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/523460/Working_Together_to_Promote_Active_Travel_A_briefing_for_local_authorities.pdf

3 https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

The lack of requirement to focus on sustainable transport solutions, particularly in major developments, means that these policies are not being achieved.

Where new road schemes are being proposed, for example, national policy should ensure that planning authorities are mandated to consider alternative (non-road) options to significantly reduce the adverse effects of the proposed schemes and they should be required to demonstrate why more sustainable, less harmful solutions are not able to be delivered.

The Community Planning Alliance submitted a Definition of Sustainable Development[4] with our response to the latest NPPF consultation, in which we highlighted the importance of clean air to communities. We believe all development **MUST** be tested against such a definition to ensure that sustainable development is being achieved in a way that does not result in serious harm to the financial, mental and physical health of existing or new communities.

Barrier 3: The use of incomplete, inaccurate or misleading data

Many planning documents do not comply with the principles set out in the Green Claims Code[5], which results in inaccurate, incomplete or misleading data being used to determine the environmental effects of a proposed scheme and the ultimate decision to adopt a plan or approve a planning application.

Traffic Assessments can be extremely flawed, with a recent example (Carrington Relief Road) using very old data (from 2014), using comparator sites that are not comparable and explicitly excluding much of the anticipated traffic volumes from the assessment. This means that the associated Environmental Assessment was unsound and decisions are being made on the basis of an unreliable, defective data model.

Furthermore, unless Environmental Assessments accurately identify the effect of a scheme, they are meaningless. This can probably only be achieved by such assessments being undertaken by independent bodies, not consultants employed by developers to reach a predetermined conclusion.

Minimising the impact of air pollution on both human and wildlife populations, suggesting that huge increases in traffic (and, therefore, the associated pollution) will have negligible or insignificant impacts on health and wellbeing does not create the environment from which improvements can be generated. If environmental harms are to be caused by development, the government should ensure that those involved are required to be honest about those harms, otherwise the risks and the impact will be substantially understated.

Policy should mandate that the extensive effects of development are required to be neutralised by the mitigation measures or completely avoided. Compensation for harms caused does not reduce the impact of pollutants.

Air pollution also affects ecological sites, including locally, regionally, nationally and internationally important sites. Understanding the effects of a scheme on these sites is dependent on access to reliable, accurate and complete evidence.

[4] https://communityplanningalliance.org/wp-content/uploads/2026/01/260113_CPA-Definition-SUSTAINABLE-DEVELOPMENT_Jan26.pdf

[5] https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims/environmental-claims-on-goods-and-services

Barrier 4: New / additional data requirements

With particulate matter lodging itself in various organs, the Committee will be aware that air pollution has been linked to many health problems, far beyond the lungs, including in the brain and for babies still in the womb. At the other end of life, components of air pollution also seem to be 'accelerating the process' of dementia. The seriousness of air pollution related health problems has been highlighted in this recent article[6], which confirms dirty air harms the organs in our body, affecting blood vessels, making heart attacks and strokes more likely. Inflammation in the lungs has caused deadly tumours, with around one in 10 lung cancers thought to be caused by air pollution in the UK. A report by the Royal College of Physicians estimates there are around 30,000 deaths a year attributable to air pollution. Furthermore, recent research (Air Pollution and Its Impact on Health and Performance in Football Players[7]) suggests that *"Even short-term spikes in air pollution have been shown to impair performance, increase respiratory symptoms, and delay recovery in athletes".*

With the above in mind, the Treasury Green Book should be updated to mandate that the Full Business Case of a scheme is required to include the costs associated with the additional public service requirements caused by a development (these costs should also include the health, fire and police service costs of attending road accidents and incidents, as well as the health implications of pollutants). Without this, the likely costs to the public purse are hidden and disregarded.

The health consequences of air pollution will not be insignificant, particularly for vulnerable communities. A recent study related to improvements to air quality in the Bradford Clean Air Zone[8] found that air pollution was a contributing factor for 35% of GP visits for breathing issues and 49% of A&E visits for conditions including asthma and chronic obstructive pulmonary disease. The introduction of the clean air zone resulted in a drop of almost 600 GP appointments a month, including 134 fewer GP visits a month for people with problems with their cardiovascular health.

It would, therefore, be helpful to require schemes to identify the current and anticipated GP and secondary care appointment volumes that can be attributed to air pollution, such as patients presenting with asthma, COPD, cardiovascular disease and other health conditions. This would ensure that there is a recognition of existing health factors from air pollution in the area of a proposed scheme. The new data requirement should also include an estimate of the increased planned and emergency treatments that will be required as a consequence of the scheme. For a new road, for example, this could include an estimate of the additional emergency care requirements of chronic illnesses as well as the increase in the number of GP appointments.

The government's Public Health briefing (mentioned above) also suggests that less affluent areas "*have a higher density of main roads, leading to poorer air quality, higher noise levels and higher collision rates*". Health inequalities are further exacerbated because "*residents of deprived communities tend to travel less than the better off but feel the impact of other people's travel. In short, increasing car dependency has led to increasing unfairness*". The new data requirements should, therefore, identify how vulnerable communities will be impacted by the scheme. Much of this data will be readily available, with the ONS providing the number of households without access to a car, including at small area statistical level.

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[6] https://www.bbc.co.uk/news/articles/c74w48d8epgo

[7] https://pmc.ncbi.nlm.nih.gov/articles/PMC12197153/

[8] https://www.bbc.co.uk/news/articles/clyx6jwww53o

Barrier 5: Lack of Monitoring Equipment

In terms of monitoring, there is a huge deficit in the number of monitoring stations and funding should be provided to enable local communities to request such equipment (capable of monitoring particulate matter).

In many proposals for development, the records relate to the nearest monitor, which may produce misleading results.

There should, particularly, be more investment in monitors where there are high concentrations of HGV traffic, areas adjacent to schools and in communities with a high level of deprivation.

Kind regards

Marj Powner

Vice Chair

Community Planning Alliance

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About the Community Planning Alliance

The Community Planning Alliance is a national umbrella group for over 700 communities, all are campaigning against inappropriate development in their areas, and all disagree that decisions are being made in the 'public interest'. We have extensive knowledge and experience of the planning system, and our aims include seeking increased community participation, better environmental protections and the right homes and infrastructure in the right places.