



**Wigan Local Development Framework
Supplementary Planning Document
Development and Air Quality**

**Consultation Statement
August 2007**

**Environmental Services Department
Wigan Council**

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Consultation Statement, July 2007 Supplementary Planning Document Development and Air Quality

- 1 559 Letters and accompanying Consultation Outline (attached at Appendix 1) were sent on 8th September 2006 to elected representatives, statutory consultees, partner agencies, individuals, groups and organisations whose details are included on the joint Development Control and Building Control Forum and the Environmental Service Department's Community Engagement database. A list of contacts may be found in Appendix 3.
- 2 The letter set out the context and purpose of the proposed draft document, and sought a response by 29th September 2006 on what information should be included to help improve air quality. The Consultation Outline was also available on Wigan Council's web site explaining that preparation of the document had started and inviting comments.
- 3 By this date three general comments and eighteen more specific comments had been received. These comments are summarised, together with the Council's response in the table attached at Appendix 4.
- 4 The Consultation Outline and the comments received were used to inform the Scoping Report for the document. The Scoping Report was sent to Statutory Consultees for consultation between 8th and 12th December 2006 for five weeks until 16th January 2007.
- 5 All information was also made available on the council's website to be viewed and downloaded.
- 6 This process has been used to inform the contents of the Draft Supplementary Planning Document, which was appraised in accordance with the Strategic Environmental Assessment Directive on 3rd January 2007. The results of this process may be found in the Sustainability Appraisal Report.
- 7 During the preparation of the draft document there has been Member involvement at Cabinet on 29th March 2007.
- 8 The formal public participation process commences at 5.00pm on 17th May 2007 and finishes at 5.00pm on 28th June 2007.
- 9 During this period printed copies of the draft Supplementary Planning Document on Development and Air Quality and related material, including this Consultation Statement, the Sustainability Appraisal Report and comments forms, were placed on deposit in the Borough's libraries, Wigan and Leigh Town Halls and at the Environmental Services Department offices at Civic Buildings and Gateway House, Wigan.
- 10 Printed copies of the draft document were also sent to the list of statutory consultees and key stakeholders, including all of those who responded at the informal consultation stage. Related material will be available in print upon request.
- 11 Everybody identified in paragraph one and Appendix 3 of this Consultation Statement were notified of the public participation on the draft document.

- 12 The formal public participation process commenced at 5.00pm on 17 May 2007 and finished at 5.00pm on 28 June 2006.
- 13 During this period printed copies of the draft Supplementary Planning Document on Development and Air Quality and related material, including the Consultation Statement, the Sustainability Appraisal Report, Scoping Report and comments forms, were placed on deposit in the Borough's libraries, Wigan and Leigh Town Halls and at the Environmental Services Department offices at Civic Buildings and Gateway House, Wigan.
- 14 Printed copies of the draft document were also sent to the list of statutory consultees and key stakeholders, including all of those who responded at the informal consultation stage. Related material was available in print upon request.
- 15 Everybody identified in paragraph one and Appendix 3 of the Consultation Statement was notified of the public participation on the draft document.
- 16 The document was advertised by way of a notice in the Wigan Observer on 15th May 2007 and the Leigh Journal on 17th May 2007.
- 17 The draft document and Sustainability Appraisal were also available for viewing on the Council's website at <http://www.wigan.gov.uk/Services/Planning/Policies/DevelopmentFramework/DevelopmentAirQuality.htm> and representations could be submitted online. It will remain on the Council's website until replaced by the adopted document.
- 18 Following the completion of the consultation exercise 13 responses were received. The main issues raised have been summarised in the table in Appendix 5. The table also includes the Council's response and a summary of the subsequent amendments to the document.

Air Quality Supplementary Planning Document Consultation Outline

1. The aim of this document is to offer guidance to Councillors, Officers, developers, and the public on the requirements for development that would adversely affect air quality. This will enable development proposals and submitted assessments to properly address the pollution policy (EV1B) of the Replacement Unitary Development Plan.
2. Central Government has identified that land use and transport planning underpin the development of an effective air quality action plan and therefore that air quality considerations should be integrated fully into these frameworks. The purpose of the proposed guidance document is to ensure that air quality is properly considered as part of the local planning process. With this and a wide range of other issues in mind, the planning system focuses on whether a new development proposal is an acceptable use of the land. In relation to air quality this means considering the effects of the new development on the surrounding area, or the effect of existing air quality on the proposed use. The most important consideration is the exposure of people to various pollutants.
3. Wigan has declared Air Quality Management Areas within the Borough, all of which lie along principal roads (Air Quality Management Areas can be seen within the Replacement Unitary Development Plan document maps at <http://www.cartoplus.co.uk/wigan/>). Such areas are declared where air quality may potentially breach objectives which are set by Regulations. Given the local distribution of Air Quality Management Areas, it is perhaps obvious that pollution arising from traffic is currently the primary concern in Wigan. It is therefore important that all submitted development proposals consider the potential impact on air quality within the Borough and take measures to minimise or remove that impact where appropriate. Again the aim of the guidance document is to assist in this process.
4. The following main headings envisaged within the guidance document are as follows:-
 - Air Quality Management Areas and Development
 - Air Quality Action Plan and Development
 - Air Quality Assessments
 - Assessing the need for Mitigating, Compensating or Offsetting Measures
 - Methods for Mitigating, Compensating or Offsetting for Air Quality Impacts
 - Air Quality during construction
 - Air Quality and Climate Change
5. As indicated by the above headings, the document will provide guidance identifying what an air quality assessment will need to include and guidance criteria indicating when such assessments should be undertaken. The criteria suggested are as follows:-

- Development proposals that will result in increased congestion, a change in either traffic volumes (for example 5% Annual Average Daily Traffic or peak flows) or a change in vehicle speed (± 10 kph), or both, on a road with greater than 10,000 vehicles per day.
 - Development proposals that will significantly increase the flow on roads lying within an Air Quality Management Area.
 - Development proposals that would significantly alter the traffic composition in an area (e.g. bus stations, heavy goods vehicle parks, increased delivery traffic.)
 - Development proposals that include new car parking spaces (>80 spaces) or coach/lorry parks.
 - Development proposals located in, or which may affect sensitive areas (e.g. ecological sites) or areas of poor air quality (including Air Quality Management Areas), where either direct emissions to air occur from the site, or where any of the preceding criteria are met.
 - Residential, school, public buildings or similar development proposals lying within an area of poorer air quality such as an Air Quality Management Area.
6. The following criteria (developments of size equal or greater than criteria listed below) are also suggested as a method to determine where an air quality assessment is likely to be required. These criteria have been largely derived from transport assessment trigger criteria:-

Development	Site Area	Gross Floor Space/units
Food-retail	0.2Ha	1000m ²
Non-food retail	0.8Ha	1000m ²
Office/B1 class uses	2.0Ha	2500m ²
Industrial (B2/B8 uses)	1.0Ha	6000m ²
Other	60 or more vehicle movements in any hour	

7. The guidance document also intends to introduce the requirement for the greater use of Section 106 agreements to secure contributions towards Air Quality Action Plan measures or other practicable mitigation measures in the locality (where sufficient mitigation cannot be achieved at a development site). It is proposed that agreements will normally be sought for such sites meeting or exceeding the following criteria:-
- Developments with 30 or more vehicle parking spaces.
 - Developments with 10 or more HGV trips to and from the site each day
 - Industrial/commercial developments with floor space equal to or greater than 1000m²
8. The methodology for calculating such a contribution will also be included as a schedule to the document, and will be based on the 'polluter pays' principle using either an estimation of pollution generated by the development or using the number of car parking spaces and anticipated car parking rate. A particular focus for agreements of this nature (although not exclusively) would be towards the provision or enhancement of off road walking and cycling routes. The development of this infrastructure is seen as key to providing a viable alternative

to local journeys made by car and will also contribute towards the health agenda (by promoting exercise).

9. The Council would welcome your involvement in the preparation of the guidance document and are hoping you can contribute by letting us know whether you agree with the proposed format, whether there are other issues that should be included or you would like to bring to our attention.

10. In particular the Council would welcome comments on the following:-

1. Are the criteria indicating where air quality assessments should be undertaken appropriate?
2. Are the suggested criteria used to direct the need for Section 106 agreements appropriate?
3. How should the level of any contribution be set and calculated where the use of Section 106 agreements are required?
4. What mitigation or compensating measure(s) you would consider a priority for Wigan?

If you require further information on air quality matters (both at a national and more local level) the following web sites may also be useful :-

- <http://www.airquality.co.uk/archive/index.php>
- <http://www.mapac.org.uk>
- <http://www.nasca.org.uk/pages/index.cfm>

I would be grateful if you could send your Consultation Outline comments in writing to the Deputy Director of Planning and Regeneration, Civic Buildings, New Market Street, Wigan, WN1 1RP. Alternatively you can email your comments to:

Paul Cartmell, [Senior Environmental Health Officer -p.cartmell@wiganmbc.gov.uk](mailto:p.cartmell@wiganmbc.gov.uk),
(telephone 01942 827075)

The deadline for comments is 29th September 2006

Example copy of letter to Statutory Consultees

To: PLEASE LEAVE BLANK

General AQ Docs enclosed

Our Ref: AJ/ 32-21 F (xvi)

Your Ref:

Please ask For: Alison Jones

Extension: 4239

Direct Line: 01942 404239

Date: PLEASE DATE 17 MAY 2007.

Dear Sir or Madam,

Draft Supplementary Planning Document: Development and Air Quality

Further to my letter of 8th September 2006 I am now writing to inform you that the Draft Supplementary Planning Document on Development and Air Quality is available for consultation. This forms part of a series of documents in our Local Development Framework.

I therefore enclose the following Documents:

- *Draft Supplementary Planning Document Development and Air Quality*
- Sustainability Appraisal Report,
- Consultation Statement
- Statement of Supplementary Planning Document Matters
- Comments Form

All documents are also available to view and download from the council's website at www.wigan.gov.uk from 5.00pm, Thursday 17th May 2007 to 5.00pm, Thursday 28th June 2007.

The purpose of the draft Supplementary Planning Document, '**Development and Air Quality**' is to provide more detailed guidance on the operation of Policy EV1B 'Pollution' in the Wigan Unitary Development Plan. It safeguards the environment by encouraging sustainable development that balances and integrates economic, social and environmental benefits. The document therefore applies to all planning applications and provides detailed guidance on how to assess the impacts your development may have on air quality and how these should be addressed or off-set.

We are seeking your comments on how this draft Supplementary Planning Document can be improved. There are three easy ways of commenting:

- Use the response form enclosed in the Supplementary Planning Document, fill it in and post it back to: Planning Policy Team, Environmental Services Department, Civic Buildings, New Market Street, Wigan, WN1 1RP.
- Click on the respond online link and fill in as instructed
- Comments can also be e-mailed to planningpolicy@wiganmbc.gov.uk

The deadline for all comments is 5pm, Thursday 28th June 2007

Thank you for your time in considering these matters and we look forward to hearing from you. If you wish to discuss any general matters please contact Alison Jones alison.jones@wiganmbc.gov.uk. or telephone 01942 404239.

This letter and the documents are available in alternative formats on request.

Yours faithfully,
Alison Jones
Planning Officer

Example copy of letter to individuals and groups expressing interest in Development and Air Quality Supplementary Planning Document only

General Doc not enclosed

Our Ref: AJ/ 32-21 F (xvi)
Your Ref:
Please ask For: Alison Jones
Extension: 4239
Direct Line: 01942 404239
Date: PLEASE DATE 17 MAY 2007.

Dear Sir or Madam,

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There are four easy ways of commenting:

- Click on the respond online link and fill in as instructed
- Download a response form, print it, fill it in and post it back to: Planning Policy Team, Environmental Services Department, Civic Buildings, New Market Street, Wigan, WN1 1RP.
- Pick up one of the Response Forms enclosed with the document in your local Library, fill it in and post it back to the address above.
- Comments can also be e-mailed to planningpolicy@wiganmbc.gov.uk .

The deadline for all comments is 5pm, Thursday 28th June 2007

Thank you for your time in considering these matters and we look forward to hearing from you. If you wish to discuss any general matters please contact Alison Jones alison.jones@wiganmbc.gov.uk. or telephone 01942 404239.

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Yours faithfully,
Alison Jones
Planning Officer

Example copy of letter to all Members of Wigan Council

To:

All members of the Council

Our Ref: AJ/ 32-21 F (xvi)

Your Ref:

Please ask For: Alison Jones

Extension: 4239

Direct Line: 01942 404239

Date: PLEASE DATE 17 MAY 2007.

Dear Councillor

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- Pick up a Response Form from the Members Library, fill it in and post it back to the address above.
- Comments can also be e-mailed to planningpolicy@wiganmbc.gov.uk

The deadline for all comments is 5pm, Thursday 28th June 2007

Thank you for your time in considering these matters and we look forward to hearing from you. If you wish to discuss any general matters please contact Alison Jones alison.jones@wiganmbc.gov.uk. – phone 01942 404239.

This letter and the documents are available in alternative formats on request.

Yours Sincerely,
Peter Rowlinson
Deputy Director Planning and Regeneration

Example copy of letter to MPs and MEPs

To:

MPs and MEPs

Our Ref: AJ/ 32-21 F (xvi)
Your Ref:
Please ask For: Alison Jones
Extension: 4239
Direct Line: 01942 404239
Date: PLEASE DATE 17 MAY 2007.

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This letter and the documents are available in alternative formats on request.

Yours Sincerely,

Peter Rowlinson
Deputy Director Planning and Regeneration

Contacts: Pre-submission participation

A copy of the Consultation Outline for the draft Supplementary Planning Document on Development and Air Quality was sent to the following:

Statutory Consultees

- British Gas
- British Telecommunications Plc
- Countryside Agency – Now Natural England
- English Heritage – Now Natural England
- Environment Agency
- GM Waste Disposal Authority
- Government Office for the North West
- Greater Manchester Strategic Health Authority
- Highways Agency
- Mobile Operators Association
- Neighbouring Local Planning Authorities (14)
- Network Rail
- North West Regional Assembly
- North West Regional Development Agency
- NWP Spectrum Ltd
- United Utilities
- Your Communications Ltd

Elected Representatives

- 74 Councillors (1 currently suspended)
- 4 MPs
- 8 MEPs
- Parish Councils within Borough (2)
- Neighbouring Parish & Town Councils (14)

Wigan Borough Partnership

- Internal consultees (chief officers)
- Township managers
- Partnership members (all key contacts for the 7 Partnerships as listed in Appendix D of the Statement of Community Involvement).
- Encompass contacts (all key contacts for the 7 Community Networks as listed in Appendix D of the Statement of Community Involvement).

Other groups and organisations

- 102 Local groups, organisations, developers, agents, local businesses and individuals on our Community Engagement Database who had expressed an interest in receiving information on documents produced as part of the Local Development Framework.
- 198 Members of the Development Control, Building Control Forum who are not included in any of the previously mentioned categories.

The following Local Groups identified as having a specific interest in Travel Plans and Development and Air Quality:

- Arriva North West and Wales
- Ashton, Leigh and Wigan PCT (Specific contact)
- B&Q, Wigan
- First Manchester
- Freight Transport Association
- Gladman
- Greater Manchester Ambulance Service
- Greater Manchester Pedestrian Association
- Jim Stones Coaches
- Leigh Homes Tenant Participation Team
- Merseyrail
- North West Regional Assembly (Specific contact)
- Northern Rail
- Olympia Travel
- RAC
- Richard Armitage Transport Consultancy Ltd
- Road Haulage Association
- Sanderson Associates (CE) Ltd
- South Lancashire Travel
- Sustrans
- TGWU
- The AA Motoring Trust
- The Impact Centre
- Transport and Travel Research Ltd
- Virgin Trains
- Wigan Access Committee
- Wigan and District Community Transport
- Wigan Borough Hackney Carriage Co-operative
- Wigan Homes Tenant Participation Team
- Wigan Institute of Advanced Motorists
- Wigan Wheelers
- Wrightington, Wigan and Leigh NHS Trust (Specific contact)

The Consultation Outline was also available on the Wigan Council website.

**Development and Air Quality Supplementary Planning Document
Summary of comments received at the informal consultation stage and Wigan Council’s response**

	Respondent	Summary of Main Comments	Wigan Council’s response
G1	Horwich Town Council	Resolved not to comment	No response required.
G2	Brian Simpson MEP	Supports document	No response required.
G3	Sajjad Karim MEP	Thanks for consultation. No comment here.	No response required.
AQ1	Broadway Malyan for Persimmon Homes NW (Adele Snook)	<ol style="list-style-type: none"> 1. Concerned about the potential to increase developer contributions. 2. Concerned that the SPD will unreasonably request planning obligations on developments that will not have a significant detrimental impact on air quality e.g. residential developments. 3. Object to the use of car parking spaces alone as a method of calculating a contribution. 4. Concerned that SPD will stop development coming forward in Wigan. 	<ol style="list-style-type: none"> 1. SPD has the potential to increase developer contributions. 2. Emissions from road traffic are currently the most significant air quality problem in Wigan. Many developments have an air quality impact, particularly adding to road traffic. It is recognised that for some developments the impact may be classed as small, however cumulatively the impact is significant adding to existing levels. The SPD aims to contribute towards addressing this impact by setting criteria above which obligations may be sought. As residential development can have a notable traffic impact, this is included. 3. It is agreed that car parking spaces alone is insufficient as a way of calculating a contribution. Two suggested options will be included in the draft guidance document which will not be based purely on car parking spaces. 4. The Council intends to maintain an individual approach to development, the document providing guidance on this approach. Proposed obligation requirements will comply with guidelines contained

	Respondent	Summary of Main Comments	Wigan Council's response
		<p>5. Agrees with the provision of cycle and pedestrian facilities being a priority as long as the requirements are reasonable.</p> <p>6. Strongly object if document is used as a means of expanding the Council's 'shopping list'.</p>	<p>in ODPM Circular 05/2005 – Planning Obligations)</p> <p>5. Agreement for need for cycling and walking infrastructure. See also item 4 above.</p> <p>6. The SPD is not proposed on the basis of expanding the Council's shopping list, but to try and address or minimise specific air quality issues/impacts in the Wigan area.</p>
AQ2	Janet Belfield, Countryside Agency	Subject matter beyond remit and responsibilities of Countryside Agency. No comment.	No response required.
AQ3	David Jeffreys, English Nature	No comment	No response required.
AQ4	Mark Chadwick, Environment Agency	No comment	No response required.
AQ5	Rosemary Olle and Peter Black, GMPTE	<p>1. Climate Change Calculations should include all sources, including travel generated by new development.</p> <p>2. Public transport produces less</p>	<p>1. Climate change calculations are traditionally beyond the remit of air quality assessments as they fall outside LAQM objectives. However, given the logical link between climate change and air quality strategies, the inclusion of climate change impact data is a desirable future progression. There is however an obvious overlap between Building Regulation requirements and other planning policies/guidance. The document will refer to the link between climate change and air quality objectives. However the requirement to report greenhouse gas is a potential future requirement, and is currently is beyond the scope of the document.</p> <p>2. Contributions to public transport infrastructure may</p>

	Respondent	Summary of Main Comments	Wigan Council's response
		carbon emissions than private transport and should be considered as a specific mitigation factor and that contributions should be sought towards public transport provision.	be sought where this is appropriate and relevant to an application(s).
AQ6	Dave Arstall, GONW	No comment	No response required.
AQ7	Kristian Marsh, Highways Agency	<ol style="list-style-type: none"> 1. Link to Travel Plan SPD and other relevant SPDs. 2. Locate developments to minimise air quality impacts. 	<ol style="list-style-type: none"> 1. The document will link to the requirements of the Travel Plan SPD and other current relevant SPDs. 2. The guidance will include consideration of the location of new development, in terms of siting sensitive development (i.e. residential accommodation, schools, public buildings) in areas of poorer air quality.
AQ8	Julie Hotchkiss, Ashton, Leigh & Wigan Primary Care Trust	<ol style="list-style-type: none"> 1. Approve of provision of off road cycling and walking infrastructure as a priority. 2. Could air quality monitoring be included as a requirement for major developments? 	<ol style="list-style-type: none"> 1. No response required. 2. Yes this will be included as an option in the guidance document, although use of this option through planning process should not duplicate regulatory requirements.
AQ9	Peter Burns, Peak and Northern Footpath Society	<ol style="list-style-type: none"> 1. Agrees with the aims and measures but is concerned that measures do not go far enough to tackle existing air quality problems. 2. In addition to traffic emissions, guidance should also cover industrial emissions including nuisance odours e.g. pungent and peppery spicy emissions. 3. Supports the aim of improving the off road walking and cycling 	<ol style="list-style-type: none"> 1. Guidance relates to new development and can not be applied retrospectively to existing uses. The proposed use of this SPD is only one of the measures included in the Air Quality Action Plan. 2. The guidance will also consider emissions from industrial sources, but will not address odours (unless associated with a potentially harmful emission) which are outside the scope of this guidance. 3. No response required

	Respondent	Summary of Main Comments	Wigan Council's response
		<p>infrastructure.</p> <p>4. Mitigation should include good design, tree planting on a large scale and emission abatement technologies.</p>	<p>4. These will be included in the guidance as suggested ways of mitigating/offsetting impacts.</p>
AQ10	Nigel Blandford, Red Rose Forest Team	<p>1. Urban Trees can play a role in mitigating atmospheric pollution.</p> <p>2. Opportunity for the increased use of biofuels.</p>	<p>1. & 2. Both tree planting and use of biofuels will be included in the suggested mitigation options.</p>
AQ11	Richard Armitage Transport Consultancy Limited	<p>Welcomes involvement but no comments.</p>	<p>No response required.</p>
AQ12	Mike Holden, Shevington Parish Council	<p>1. Criteria are appropriate, but no reference to different sizes of housing developments or being carbon neutral.</p> <p>2. Can the requirements be applied retrospectively?</p> <p>3. Could an environmental offset charge be imposed on development?</p> <p>4. Can more be done to reduce the impact of local motorway traffic?</p>	<p>1. The criteria proposed reflect different sizes of developments and varying requirements relating to impact. The guidance is targeted towards air quality pollutant issues. These are often compatible with climate change aims. The guidance does not require developments to be carbon neutral but does indirectly support such steps.</p> <p>2. No, the requirements of the guidance can not be applied retrospectively.</p> <p>3. Although the suggested use of planning obligations goes some way to address this, such a charge is beyond the scope of this guidance document.</p> <p>4. The guidance considers the impact of emissions from motorway traffic in relation to new development in its proximity. Actions to reduce the impact of emissions from motorways are contained in the Greater Manchester LTP2 Air Quality Strategy and Action Plan 2006 Document, although it should be noted that control of such roads is vested in the Highways Agency, not the local</p>

	Respondent	Summary of Main Comments	Wigan Council's response
			authority.
AQ13	Henryk Peterson, Sport England	No comments but wishes to remain involved.	No response required.
AQ14	Peter Foster, Sustrans	Fully supportive of document.	Support acknowledged, no response required.
AQ15	David Hardman, United Utilities	No comments	No response required.
AQ16	David Hodcroft, Bury Council (Environment SPIGLET Group)	<ol style="list-style-type: none"> 1. Formula used for Section 106 contributions should be transparent and workable. 2. Links to the delivery of Local Transportation Plan 2 (LTP2). 3. Potential impact of the introduction of a 'Planning Gain Supplement'. 4. Potential to pool contributions to fund major transport infrastructure projects at regional level. 5. Ideally guidance should be provided 	<ol style="list-style-type: none"> 1. The SPD will contain suggested formulae (relating to the transport impact of developments) which will be designed to be transparent and workable. It is proposed that non-transport emissions will be assessed individually due to wide potential variance of sources/pollutants. 2. The measures proposed in the SPD will link to the measures contained in the regional LTP2 document (Greater Manchester LTP2 Air Quality Action Plan and Strategy 2006). 3. The introduction of a Planning Gain Supplement may affect the use of Section 106 agreements. SPD guidance will need to be reviewed if such a Supplement is introduced. 4. Although Air Quality Action Plan measures progressed through the application of the SPD are considered to be implemented predominantly locally (due to requirements of ODPM Circular 05/05 Planning Obligations – i.e. obligations should be directly relevant to a proposed development), the possibility to pool resources between districts for more significant infrastructure projects is also potentially within the scope of such guidance. However the emphasis for this SPD is anticipated to be on locally applied infrastructure measures. 5. The document will contain a list of recommended

	Respondent	Summary of Main Comments	Wigan Council's response
		on the most appropriate measures.	(but not compulsory) measures for developments of varying scale.
AQ17	E. Hill, 233 Preston Road, Standish	<ol style="list-style-type: none"> 1. Requests system to restrict overdevelopment. 2. Lost opportunities and negative impact of past developments. 3. Developers views are the only ones applicable and more authority led information should be prepared. 	<ol style="list-style-type: none"> 1. This is beyond the scope of the current document. 2. The document cannot rectify past decisions, it can hopefully ensure future decisions are better informed and directed. 3. This document will help to redress the balance of views and give background to decisions taken.
AQ18	National Society for Clean Air and Environmental Protection	No comments other than reference to revised national guidance (from NSCA) due for release on 7 November 2006	Document will be revised considering new guidance.

Development and Air Quality Supplementary Planning Document
Summary of comments received at the formal consultation stage and Wigan Council's response

Date	Respondent	Summary of Main Comments	Wigan Council's response
18/05/07	Philip Megson Strategic Planning Team Environment Directorate, Lancashire County Council	No observations	-
23/05/07	Dave Arstall GONW Local Planning Team	Do not wish to offer any comments	-
23/05/07	Peter Black Environmental Projects Controller, GMPTE	<p>1. Welcomes actions on p.9, particularly reducing the need to travel, travel plans and encouragements for cycling and public transport.</p> <p>2. Climate change gas emissions should be included.</p>	<p>1. Support acknowledged.</p> <p>2. There is increasing focus on climate change issues. There is an obvious overlap between climate change and air quality requirements in many cases. The SPD goes a significant way to address this through the selection of recommended mitigation methods for various scales of development e.g. BREEAM/Sustainable Homes measures (recommending standards above building Regulation requirements), travel plans, use of renewables and sustainable transport measures. It is not intended to place a requirement to assess climate change gases in this SPD.</p>
06/06/07	Josephine Prior Building Research	1. recommends the use of wording domestic and non-domestic instead of terms residential, commercial and	1. Although this view is accepted, it considered that the use of the terms residential, public, commercial and industrial are more easily understood and that despite

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	Establishment	<p>Industrial as these terms may be too limiting.</p> <p>2. EcoHomes requirements for new homes should be replaced by Code for Sustainable Homes.</p> <p>3. Recommended that Sustainable Homes/BREEAM assessments are submitted as part of a planning application.</p> <p>4. How will these requirements be secured.</p>	<p>some limitations their use preserved in the document.</p> <p>2. Recommendation for EcoHomes requirements will be substituted with approximately parallel Sustainable Homes requirements in Appendix B.</p> <p>3. para. B32 will be amended to recommend that Sustainable Homes/BREEAM design stage assessments are submitted with the planning application.</p> <p>4. Requirements will be required through both condition and obligation and checked through design and post construction assessment.</p>
13/06/07	Billinge Chapel End Parish Council	<p>1. The documents need to bear in mind that lay persons need to be able to understand them.</p> <p>2. The graphics showing the AQMA could be larger and more specific (para. 1.13).</p> <p>3. The document should include Appendices showing the objectives and healthy impacts of each pollutant.</p> <p>4. Recommend further Appendix/Supplement in relation to Greenhouse gas emissions/Carbon Neutrality.</p> <p>5. Caption to graphic on p.7 is incorrect.</p> <p>6. Pleased to see air quality safeguards.</p> <p>7. Use of '<' and '>'.</p> <p>8. Sustainability Appraisal report is a very professional document and emphasises how clearly the Department members view their responsibilities.</p> <p>9. Consultation statement is clear.</p>	<p>1. The document has been simplified significantly through the drafting process. Unfortunately although the aim of the document is simple (to help minimise air pollution impact of new development) the technical nature of the subject and management/assessment structure that supports it is complicated and supported by extensive technical and policy guidance. It is considered that the web links referred to in Appendix A provide a more detailed and full explanation where this is required.</p> <p>2. The graphic shown is an extract from the Unitary Development Plan map available on the web. Selecting a different colour may therefore enhance the graphic but may cause some confusion. A less cluttered graphic will however be selected for the final document in para. 1.13.</p> <p>3. As the objectives have been and may be periodically revised (based largely on European directive revisions and new evidence), it is considered that the table of objectives are best accessed through the web links detailed in Appendix A. This is also the case for the</p>

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		10. Supports the suggested arrangements in its aim to reduce pollution.	health effects. 4. Greenhouse gases are not currently addressed under the Local Air Quality Management regime and therefore further detail on this does not add to the specific purpose and aims of the document. However, it should be noted that a number of the recommended mitigation measures go a significant way to also reduce the carbon based impact of a development. 5. The caption is incorrect. It will be amended. The graphic shown is a diffusion tube used to monitor local air quality. The caption shown in para 4.2 will therefore be amended accordingly in the final document. 6. Support acknowledged. 7. Further explanation is not considered necessary. 8. Comments acknowledged. 9. Comments acknowledged. 10. Support acknowledged.
21/06/07	Dawn Hewitt Planning Liaison Officer The Environment Agency	1. The Agency supports the aims of the document. 2. The draft document and the Sustainability Assessment appear comprehensive and we have no comments to make.	1 & 2. Support and comments acknowledged.
22/06/07	Environment and Development Partnership (presented by Dave Young Wigan Council Environmental	1. No comments	-

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	Protection Service Manager)		
25/06/07	David Hardman United Utilities Asset Protection	No comment	-
25/06/07	Laura Edwards Home Builders Federation	<p>1. HBF objects to the inclusion of EcoHomes rating in the document and suggests the use of the Code for Sustainable Homes.</p> <p>2. The HBF objects to the inclusion of 10% renewables provision on site as this has proven to be unworkable. This may not be the most appropriate means of achieving reduction either technically or financially.</p> <p>3. More attention should be directed towards the existing housing stock rather than new build.</p> <p>4. The requirements make new homes more expensive.</p> <p>5. There should not be hard and fast requirements.</p> <p>6. Policy approach should concern itself with spatial implications of land use rather than matters best left to other regulatory processes.</p> <p>7. Matters of importance in relation to development costs should be set down in a Development Plan Document rather than a Supplementary Planning Document</p>	<p>1. EcoHomes requirements will be replaced by requirements under the Code for Sustainable Homes. It is recognised that the Code for Sustainable homes will be the most appropriate rating method for new homes in England. Appendix B will therefore be amended to require Sustainable Homes based requirements.</p> <p>2. This requirement is only recommended for larger scale developments and is a 'recommended' requirement. The final package of measures will need to be agreed with the local planning authority, and therefore may contain variations or alternatives to the recommended options. Consideration of other policy requirements will also be required. No amendments to the document will be made in relation to this comment.</p> <p>3. The planning system cannot be applied retrospectively. Others measures detailed in the Air Quality Action Plan are being applied to help improve the existing stock e.g. HECA, EEC grants, domestic boiler grants.</p> <p>4. The additional cost of incorporating requirements at the design, planning and building stage is not considered prohibitive and measures and levels sought have taken this into account. Recent market led increases are much more significant. The cost of measures may also be off-set by subsequent operational savings and some of the items may enhance the desirability of properties and be used as a</p>

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			<p>marketing feature for developers.</p> <p>5. The requirements are not hard and fast, but will generally be sought to help address local air quality issues. The methods used for a development can be adapted to meet site specific issues. This ethos is also incorporated in the use of the Code for Sustainable Homes/EcoHomes/BREEAM.</p> <p>6. Local Air Quality is an important issue (identified at one of the most important local issues by the recent Rogers review) and should be addressed at every possible level where improvements can be sought. The development guidance is only one measure under the local Air Quality Action Plan.</p> <p>7. Matters relating to development costs are already set out through policies EV1B and G1B of the Unitary Development Plan, the statutory plan for the borough.</p>
25/06/07	Peter Sargeant Lowton Warrington	<p>1. Disappointed by the lack of an evidence base in the Sustainability Appraisal.</p> <p>2. Presentational problems – ‘well being’ in para 1.1 and use of ‘you’ in para. 1.9 and use of ‘all encompassing’ in D3</p> <p>3. Too many interpolations.</p> <p>4. No explanation of the terms NOx and NO₂ or BREEAM.</p> <p>5. Technical parts difficult to understand</p>	<p>1. The Air Quality SPD was produced in advance of the Councils Core Strategy. As a result, we were in the evidence gathering stages and some data gaps existed (this was acknowledged and explained in both the Sustainability Appraisal Report and SA Scoping Report). Baseline information for sustainability appraisal should be proportionate to the plan being appraised and its likely impact on the environment, society and economy. We made use of available time-series data on NO₂ emissions and particulate matter (PM₁₀) emissions, which was attached as Appendix B to the Scoping Report.</p> <p>Part of the evidence base also involved a review of relevant policy, plans, programmes and strategies from international to local level. This included documents</p>

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			<p>such as "<i>Planning Policy Statement 23 – Planning and Pollution Control and Annex 1 – Pollution Control, Air and Water Quality</i>" and "<i>Climate Change: the UK Programme</i>". The key messages and issues from a review of these documents were summarised in the Scoping Report and attached in full detail as appendix A.</p> <p>The scoping report also contains a clear methodology for how we would be carrying out the sustainability appraisal. Our approach was based on government guidance and was informed by a robust review of evidence.</p> <p>The actual appraisal results are contained in the appendices to the Sustainability Appraisal Report. We have ensured that there are clear justifications for our decisions about the SPDs impacts in this section.</p> <p>2. para 1.1 will be amended to read 'wellbeing'. Para 1.9 will be amended to read '... for example the development of housing... And ... a proposed development will lead... 3. Interpolations are considered necessary to aid explanation and yet keep the document as concise as possible. 4. A glossary will be included in the final document to aid understanding. 5. It is accepted that due to the technical nature of the subject and policy the subject can be difficult understand. The web site links and documents included in Appendix A provides greater detail and explanation if required. The addition of a glossary to the final</p>

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27/06/07	Paul Entwistle Regional Planning Officer North West Regional Assembly	1. Adopted Regional Planning Guidance (RPG 13) and the current Draft Regional Spatial Strategy should be considered when assessing the document. 2. Adopted policies EQ2, ER13, and draft policies DP1 and EM16 provide a framework policy.	document should also aid understanding. 1. The Regional Planning Guidance document has been consider and referred to in Appendix A of the document. 2. The framework policies and the aims and measures set out in the SPD are considered complementary. The document is also considered particularly to compliment additional draft polices DP6, DP8, DP9, RT6 and RT7. Reference will be made to the RSS in Appendix A.
29/06/07	Judith Chan Wardell Armstrong Consultants	1. How can the affect of some mitigation measures be assessed e.g. use of greener vehicles, minimising the need to travel? 2. Make reference to the Air Quality Regulations 2007 under the useful documents and links section. 3. How would you assess the number of people exposed to a particular change in air quality? 4. Are the bullet points in D1 leading up to the significance criteria in table D2 or are they the citeria themselves? 5. To use subscript for NO2 and PM10	1. It is agreed that some measures are more difficult to quantifiable assess than others. In some cases it may be possible to quantify a reduction in mass emissions based on data provided by a manufacturer or from evidence obtained from the operation of similar schemes in different areas of the country. In some cases a qualitative assessment will be the most appropriate method. An emission/concentration based assessment will not always be required as indicated in the SPD (para. 3.1 – 3). This will also be clarified in para. C1 – 9. 2. This will be included in Appendix A as it now replaces the 2003 Regulations. 3. Where this is an issue this will be done through the assessment process (usually requiring a detailed assessment). Assessment will be undertaken on an individual application basis. This is considered appropriate as the issue being assessed is health based. In general terms the Council will not permit sensitive development in areas of poor air quality as per the UDP policy (EV1B) quoted in the document. Where a development has mixed affects e.g. some residences with better air quality and some with worse,

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			<p>a balancing approach will be used. Where such developments are permitted, considerable emphasis will be placed on mitigating/compensating measures, particularly for those experiencing an air quality deterioration. This explanation will be added as an additional note to Table D2 (in para. D7) and specified as potential requirement of an assessment in para. C1 – 4 .</p> <p>4. They are both leading up to the criteria in table D2 and criteria themselves, as paragraph D2 explains that the significance tables are not all encompassing.</p> <p>5. It is the Council's intention to use subscripts (NO₂ and PM₁₀) for the final document. However the publishing software currently used (Limehouse Software) does not have the functionality for subscripts or superscripts. We are in discussion with Limehouse to rectify the situation.</p>