



Working together for a healthier Belfast

Response to Air Quality and Land Use Planning: A Belfast Specific Guidance Note for Developers and Air Quality Consultants

**Belfast Healthy Cities
October 2008**

Belfast Healthy Cities welcomes the opportunity to comment on this draft guidance note.

Belfast Healthy Cities works to shape and influence healthy public policy. Our aim is to ensure that health and wellbeing is prioritised in all policies, and we work with organisations to promote and facilitate new intersectoral ways of working to achieve this. In 2005, we supported Belfast City Council to carry out a Health Impact Assessment of the draft Air Quality Action Plan. We believe this was an important piece of work, which demonstrated a commitment to improving health and wellbeing as a key aim of the Action Plan.

We are pleased to see that the draft guidance note also identifies the importance of good air quality for health from the outset. However, we believe the guidance note would benefit from an additional short section that outlines the health impacts of air pollution, as developers may not have detailed knowledge of this. Such a section would also help clearly illustrate why it is important to ensure new development does not result in increased air pollution, and strengthen the case for incorporating proposed mitigation measures in the development proposal.

A 'Health impacts context' section should outline the health risks associated with key pollutants (eg. shortened life expectancy and respiratory health risks of particulate matter), but also emphasise the key sources of each pollutant and potential consequences of uncontrolled development. As such, the section should be closely connected to the section on mitigation measures.

Indeed, we believe it would be useful to expand on and emphasise Appendix 3 on mitigation measures, especially in relation to measures to reduce a development's impact on air quality and measures to protect human health. This would enable developers to consider measures at an early stage, which may increase the likelihood of such measures being incorporated and implemented. The section should, in particular, include an outline of how measures aimed at reduced reliance on private transport could result in improved air quality as well as additional health benefits (eg. reduced obesity through increased physical activity, improved social networks) and other benefits (eg. less congestion and potentially lower costs of the development due to lesser infrastructure needs).

We also believe that it would be useful to refer to relevant Planning Policy Statements (PPS) in the Planning Context section, especially as PPS13 (Transportation and Land Use) is mentioned within Appendix 3 on mitigation measures. Other relevant statements would include PPS3 (Access, Movement and Parking), PPS4 (Industry, Business and Distribution), PPS5 (Retailing, Town Centres and Commercial Leisure) and PPS7 (Quality Residential Environments). Although all of these will not include explicit guidance in relation to air quality, highlighting their relevance would help developers see the linkages between air quality and other land use related issues.

Finally, we believe that by publicising the guidance note appropriately and encouraging developers to use it, Belfast City Council is in a key position to ensure developers not only safeguard air quality, but also contribute to more sustainable and healthy development practices and lifestyles in the city.