



Appendix 6.1 Air Quality Policy



Legislation, Policy and Guidance

The air quality assessment has been undertaken within the context of relevant legislation, planning policies and guidance documents.

Legislation

There are two sets of air quality legislation which include ambient air quality thresholds for the protection of public health that apply in England, these include legally binding limit values originally set by the European Air Quality Framework Directive and daughter Directives^{1, 2}, which were transposed into UK law through the Air Quality Standards Regulations 2010³ and the regulations implementing national air quality objectives as set out in Air Quality Strategy (AQS) 2023⁴ for England which local authorities are required to work towards achieving.

The EU (Withdrawal Agreement) Act 2020 sets out arrangements for implementing air quality limit values that are included in the EU Directive on ambient air quality and cleaner air for Europe (2008/50/EC) included in the following:

- Air Quality Regulations (SI 2010 No.1001)⁵ and amended (SI 2016 No.1184)⁶;
- The Air Quality (Amendment of Domestic Regulations) (EU Exit) Regulations 2019 (SI 2019 74)⁷;
- The Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020 (SI 2020 1313)⁸ which amend the Air Quality Regulations (SI 2010 No.1001) to account for EU withdrawal; and
- The AQS objectives are implemented in the Air Quality (England) Regulations 2000 (SI 2000/928)⁹ and Air Quality (England) (Amendment) Regulations 2002 (SI 2002/3043)¹⁰.

Environment Improvement Plan 2023

¹ European Commission Directive 2008/50/EC. Directive 2008/50/EC of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe.

² European Air Quality Directive 2004/107/EC. European Air Quality Directive 2004/107/EC of the European Parliament and of the Council of 15 December 2004 relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air.

³ The Air Quality Standards Regulations 2010.

⁴ Defra (2023) The Air Quality Strategy for England.

⁵ The Air Quality Standards Regulations 2010

⁶ The Air Quality Standards (Amendment) Regulations 2016

⁷ The Air Quality (Amendment of Domestic Regulations) (EU Exit) Regulations 2019 (legislation.gov.uk).

⁸ The Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020 (legislation.gov.uk).

⁹ The Air Quality (England) Regulations 2000

¹⁰ The Air Quality (England) (Amended) Regulations 2002

The Environmental Improvement Plan 2023 for England¹¹ is the first revision of the UK Government's 25 Year Environment Plan. It builds on the 25 Year Environmental Plan vision with a new plan setting out how to deliver each goal for improving the environment, matched with interim targets to measure progress.

Goal 2 of the Environmental Improvement Plan relates to air quality and sets targets and commitments to reduce population exposure to poor air quality, as well as setting legal concentration targets and emission reduction targets for a range of pollutants. Of specific relevance to this assessment is the new annual mean target concentration for PM_{2.5} to be achieved across England by 2040 (the future 2040 AQO).

A legally binding PM_{2.5} Annual Mean Concentration Target (AMCT) and a legally binding Population Exposure Reduction Target (PERT) were prescribed in the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023¹² pursuant to the Environment Act 2021. These statutory targets require that by 31 December 2040:

- Annual average of 10 µg/m³ not to be exceeded at any monitoring station.
- Population exposure at least 35% lower than in 2018.

The Environmental Improvement Plan¹³ set interim targets to be met by 31 January 2028, specifically:

- An annual mean PM_{2.5} concentration target of 12 µg/m³.
- A 22% reduction in population exposure compared to 2018.

The 2025 Environmental Improvement Plan¹⁴ updates and accelerates interim ambition by committing to achieve the following by December 2030:

- Annual mean PM_{2.5} concentration target of 10 µg/m³.
- A 30% reduction in population exposure compared to 2018.

Environment Act 2021 - Local Air Quality Management

¹¹ Defra (2023) Environmental Improvement Plan (EIP)

¹² Statutory Instrument 2023, No. 96, The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023.

¹³ Defra, 2023. Environmental Improvement Plan 2023. Available from: <https://www.gov.uk/government/publications/environmental-improvement-plan/environmental-improvement-plan-2023-executive-summary>

¹⁴ Defra, 2025. Environmental Improvement Plan 2025. Available from: <https://www.gov.uk/government/publications/environmental-improvement-plan-2025/environmental-improvement-plan-eip-2025#chapter-2-environmental-quality>

Obligations under the Environment Act 2021¹⁵ (which provides an amendment to the Environment Act 1995¹⁶) requires local authorities to review and assess air quality in their administrative boundaries. Where AQOs are predicted to be exceeded, the local authority must declare an Air Quality Management Area (AQMA) at sensitive receptor locations and formulate an Air Quality Action Plan (AQAP) to reduce pollution concentrations to values below the relevant AQO.

Planning Policy

National Planning Policy

National Planning Policy Framework (NPPF)¹⁷

The National Planning Policy Framework (NPPF) was updated in August 2026. Policy P3: Living Conditions and Pollution emphasises the need to align the effects of air pollution with health outcomes.

Policy P3 states:

“Development proposals should be appropriate for their location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, whether these effects are on or off-site; and whether this is as a result of the development itself or the product of preexisting conditions in its vicinity. In assessing the potential effects of pollution, consideration should be given to the potential sensitivity of the site, and its intended occupiers and users, as well as that of the environment and population in the surrounding area (including where certain groups could be particularly vulnerable to its effects, such as children and older people).”

Policy P3(2)(c) specifically addresses air quality and states:

“Sustain and contribute to compliance with relevant limit values or national objectives and targets for air pollutants including PM2.5. Development proposals should take account of Air Quality Management Areas and be consistent with the objectives of relevant Air Quality Action Plans, Clean Air Plans and Local Air Quality Strategies;”

Emphasis is placed on providing suitable mitigation measures where necessary to “secure acceptable living conditions”.

¹⁵ Environment Act 2021

¹⁶ UK Public General Acts. Environment Act 1995.

¹⁷ Ministry of Housing, Communities and Local Government (August 2026) National Planning Policy Framework. HMSO.

Planning Practice Guidance¹⁸

The Air Quality Planning Practice Guidance, which was last updated in November 2019 provides guiding principles on how planning can take account of the impact of new development on air quality. The Air Quality Planning Practice Guidance summarises the importance of air quality in planning and the key legislation relating to it.

Local Planning Policy

Wokingham Borough Council Local Plan Core Strategy¹⁹

The Core Strategy is a high-level document setting out the Council's strategy for managing development until 2026. This includes policies and strategies to provide new housing, schools, roads, places to work and other services. Policy CP1 on Delivering a sustainable borough states:

"CP1 – Sustainable development

Planning permission will be granted for development proposals that:

1) Maintain or enhance the high quality of the environment;

2) Minimise the emission of pollutants into the wider environment;

...

8) Avoid areas where pollution (including noise) may impact upon the amenity of future occupiers;

...

10) Provide attractive, functional, accessible, safe, secure and adaptable schemes;

11) Demonstrate how they support opportunities for reducing the need to travel, particularly by private car in line with CP6; and

12) Contribute towards the goal of reaching zero-carbon developments as soon as possible by:

a) Including appropriate on-site renewable energy features; and

b) Minimising energy and water consumption by measures including the use of appropriate layout and orientation, building form, design and construction, and design to take account of microclimate so as to minimise carbon dioxide emissions through giving careful consideration to how all aspects of development form.."

¹⁸ Ministry of Housing, Communities and Local Government, 2019. Planning Practice Guidance. Available from: <https://www.gov.uk/government/collections/planning-practice-guidance>

¹⁹ Wokingham Borough Council (January 2010) Core Strategy. Available at: <https://www.wokingham.gov.uk/planning-policy/adopted-development-plan/local-plans>

Wokingham Borough Managing Development Delivery Plan²⁰

The Managing Development Delivery (MDD) Local Plan establishes a general policy requirement that development should protect and enhance environmental quality, including air quality, by minimising pollutant emissions and avoiding exposure of sensitive receptors to poor air quality. Air quality is not addressed through a standalone policy but is embedded within broader development management principles. These require proposals to demonstrate that they will not give rise to unacceptable environmental impacts and that appropriate mitigation is incorporated where necessary, aligning with sustainable development objectives and environmental protection commitments.

Emerging Local Plan Update²¹

The Local Plan Update Proposed Submission Plan (Regulation 19) consultation sets out the planning policies proposed to manage development across the borough to 2040. Policy C1 on Active and sustainable transport and accessibility states:

“... 4. Development proposals must contribute to the delivery of an integrated transport system that is safe and accessible to all by implementing a proportionate package of measures that:

... h) Embrace opportunities to minimise congestion and delay, as part of an effective strategy to manage harmful emissions and improve air quality;...”

Policy HC6 on Air pollution and air quality states:

“1. Development proposals should maintain, and where possible improve air quality.

2. Development proposals should consider the prevailing air quality and potential impacts upon air quality arising from airborne particulates, dust and odour associated with the construction and operation of a proposal (including vehicular traffic).

3. Air Quality Assessments can demonstrate how prevailing air quality and potential impacts upon air quality have been considered and how air quality will be maintained at an acceptable standard through avoidance and mitigation measures. Development proposals are likely to require an Air Quality Assessment where:

a) The site is located within an Air Quality Management Area (AQMA);

b) The development has the potential to impact on air quality within an AQMA either on its own or in combination with other development;

²⁰ Wokingham Borough Council (2014) Development Plan. Available at:

<https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Adopted%20MDD.pdf>

²¹ Wokingham Borough Local Plan Update 2023 – 2040 Proposed Submission Plan. Available at:

<https://www.wokingham.gov.uk/planning-policy/adopted-development-plan/local-plans>

- c) It has the potential to impact on the implementation of Air Quality Action Plans or Local Air Quality Strategies, either on its own or in combination with other development;*
- d) The site is located within or close to an urban area that is known to experience higher levels of airborne particulates from vehicle emissions;*
- e) The site is within proximity to a source of air pollution which could present a significant risk to human health, protected species, or irreplaceable habitats; or*
- f) The type of development would mean its occupiers would be particularly sensitive to air pollution, such as schools, health care establishments or specialist accommodation.”*

Sustainable Design and Construction Supplementary Planning Document²²

The Sustainable Design and Construction Supplementary Planning Document (SPD) supports air quality objectives by requiring new development to incorporate sustainable design and construction principles that minimise emissions and exposure to pollution. It emphasises integration with transport and spatial planning policies to reduce reliance on private vehicles, promote sustainable travel (walking, cycling and public transport), and support low-emission infrastructure.

Development proposals are expected to assess and mitigate their air quality impacts, with major schemes typically requiring emissions mitigation measures and, where relevant, detailed air quality assessments. Mitigation should prioritise on-site measures, with off-site contributions where necessary, to ensure no deterioration in local air quality and to support improvements, particularly within or near Air Quality Management Areas. Appendix 3 is specifically referenced as it sets out the Council’s approach to air quality mitigation, including a structured framework for identifying appropriate measures based on development type and scale. It outlines a hierarchy prioritising on-site mitigation (such as low emission technologies, EV infrastructure, and design measures to reduce exposure), with off-site contributions where required.

Wokingham Borough Council Air Quality Action Plan²³

The Air Quality Action Plan (AQAP) sets out how Wokingham Borough Council will improve local air quality in accordance with its statutory duties under the Environment Act 1995 and the Local Air Quality Management framework. It focuses on reducing concentrations of nitrogen dioxide (NO₂), the principal pollutant of concern, particularly within designated Air Quality Management Areas (AQMAs).

²² Wokingham Borough Local Development Framework Sustainable Design and Construction Supplementary Planning Document. Available at [wokingham.gov.uk/planning-policy/adopted-planning-guidance](https://www.wokingham.gov.uk/planning-policy/adopted-planning-guidance)

²³ Wokingham Borough Council Air Quality Action Plan. Available at <https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/final%20action%20plan.pdf>

The plan identifies road transport as the dominant source of emissions and establishes a package of measures centred on reducing traffic-related pollution. These include promoting sustainable travel (walking, cycling, public transport), improving traffic management, supporting low-emission vehicles, and integrating air quality considerations into planning and development control.

Guidance

The following non-statutory guidance documents have been used to inform the assessment methodology within this chapter:

- Air Quality Strategy: framework for local authority delivery²⁴, sets out a framework to enable local authorities in England only to deliver for their communities and contribute to long-term air quality goals, including ambitious new targets for fine particulate matter (PM_{2.5});
- Local Air Quality Management Technical Guidance 2022 (LAQM.TG(22)), which provides advice as to where the national AQOs apply and support to local authorities in carrying out their duties under the Environment Act 1995 and subsequent regulations;
- Institute of Air Quality Management (IAQM) guidance on the Assessment of Dust from Demolition and Construction²⁵;
- IAQM guidance on Land-Use Planning and Development Control: Planning for Air Quality²⁶; and

²⁴ Department for Environment, Food and Rural Affairs (Defra) (2023) The Air Quality Strategy Framework for local authority delivery. This revised strategy supersedes the air quality strategy: Volume 1 in England only.

²⁵ Institute of Air Quality Management (IAQM) (2024) Guidance on the Assessment of Dust from Demolition and Construction. V2.2.

²⁶ Moorcroft and Barrowcliffe et al. (2017) Land-use Planning & Development Control: Planning for Air Quality. v1.2. Institute of Air Quality Management, London.