

From: Matthew.Porter <Matthew.Porter@horsham.gov.uk>
Sent: 18 August 2020 11:46:46 UTC+01:00
To: "Matthew.Porter" <Matthew.Porter@horsham.gov.uk>
Subject: FW: DC/19/2464 Broad acres Phase 5 Update 24/07

From: Anna.Czerska <Anna.Czerska@horsham.gov.uk>
Sent: 18 August 2020 11:21
To: Matthew.Porter <Matthew.Porter@horsham.gov.uk>
Subject: RE: DC/19/2464 Broad acres Phase 5 Update 24/07

Hi Matthew,

I sincerely apologise for a long delay in replying.

Taking into account the clarifications given by Jason Mills of Stuart Michael Associates these are the conclusions from the Air Quality Assessment (January 2020).

1. Although acceptable, the dispersion model shows some uncertainty. A crucial part of an air quality assessment report is model verification, which explains the model's set up and shows the model's uncertainty. Defra recommends that model performance is assessed by statistics such as the correlation coefficient, fractional bias and Root Mean Square Error (RMSE). None of these are given in the report but the consultant confirmed by email that the RMSE value was $8.8 \mu\text{g}/\text{m}^3$. The value is within the $\pm 25\%$ of the objective being assessed, however this means that at some locations the model can, on average, over-predict or under-predict by nearly $9 \mu\text{g}/\text{m}^3$. Although still technically acceptable, the TG16 guidance recommends that ideally an RMSE should be within $4 \mu\text{g}/\text{m}^3$. Also, the TG(16) guidance advises that it is important to check that a model is performing well at locations of concern – in this case this is Worthing Road. From the comparison of modelled and monitored NO_2 at site Southwater1 on Worthing Road it is evident that the model under-predicts by $12 \mu\text{g}/\text{m}^3$. I agree with the consultant's clarification that improving the model's accuracy would not lead to it showing any exceedances – but I would still recommend better adherence to good practice.
2. Regarding the damage cost calculation, I accept the consultant's selection of 'Rural' parameter to describe Southwater if indeed its population falls under 10,000. The selection of 'Rural' criteria (as opposed to 'Urban Small'), firstly, in the Emissions Factor Toolkit and, secondly, in the Cost Appraisal Toolkit gives a significantly lower cost figure than if 'Urban Small' criteria were used.
3. No mitigation other than a provision of ev charging points have been proposed. The applicant notes in par. 6.19 of the Air Quality Assessment report that [...] *if mitigation measures are not available or are not suitable, the Local Planning Authority can seek compensation for any amount less than the amount stated above [£30,938.48] (through the use of a Section 106 Agreement)*. However, as shown by the ruling in Gladman Developments Ltd ("Gladman") v the Secretary of State for Communities and Local Government and CPRE (Kent) [2019] it is not down to the LPA to design and implement an air quality mitigation plan; it is down to the applicant to provide evidence that the air quality mitigation measures proposed would mitigate or offset the impacts of the traffic associated with the development. In preparing the mitigation plan, my recommendation would be to have it linked to the air quality measures being or having been undertaken for the other phases of the development. There is an opportunity for the proposed development to contribute to the outcomes of these measures by building on the experience with their delivery.

Best regards

Anna

Anna Czerska

Environmental Protection Officer

Telephone: 01403 215292

Email: Anna.Czerska@horsham.gov.uk



Horsham District Council, Parkside, Chart Way, Horsham, West Sussex RH12 1RL

Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Glen Chipp