

From: Nicola.Pettifer <Nicola.Pettifer@horsham.gov.uk>
Sent: 01 September 2023 15:09:35 UTC+01:00
To: "Nicola.Pettifer" <Nicola.Pettifer@horsham.gov.uk>
Subject: FW: Church Lane Ashington Air Quality

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

From: Thais Covre Delboni
Sent: 07 August 2023 10:32
To: Nicole Holland
Subject: RE: Church Lane Ashington Air Quality

Dear Nicole,

Thank you for providing further clarification regarding the Air Quality comments on the application (DC/23/0406).

I agree with your explanations, the final selection of Air Quality Mitigation measures will be secured by planning condition.

Kind regards,
Thais

Thais Covre Delboni

Air Quality Project Officer

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

From: Nicole Holland
Sent: 28 July 2023 17:29
To: Kevin.Beer
Cc:
Subject: Church Lane Ashington Air Quality

Good afternoon Kevin,

I am contacting you regarding the comments that you recently supplied regarding the Air Quality Assessment undertaken for the proposed development at Land To The West of Ashington C of E School, Park Lane, Ashington, West Sussex (DC/23/0406). I would like to provide you with further clarification regarding some of the points that you raised regarding air quality, and also to agree dust monitoring requirements. Please see below my responses to your comments (in blue text):

In response to your comments regarding receptors *"We have been unable to find the results for Ashington C of E First School assessment. The school is also missing as an existing receptor in the methodology chapter Table 3-1 and Figure 3-1"* and *"The school should be included in the model due to its proximity to the development and to its sensitivity to emissions, otherwise please add a paragraph in the report explaining why the school was not included in the assessment."*

The relevant UK guidance, on which the Air Quality Assessment (AQA) is based (EPUK/IAQM guidance on 'Land-use Planning & Development Control: Planning for Air Quality') is clear that in instances where a development results in a change in traffic that is <500 Annual Average Daily traffic (AADT) in areas outside of an Air Quality Management Area (AQMA), then it is appropriate for the potential air quality effects to be screened out as being 'not significant'. This screening criteria is discussed within Section 3 of the AQA.

The Ashington Church of England First School is located a significant distance (>100 m) from the closest road where the proposed development will result in an increase of >500 AADT. The proposed development is expected to result in an increase of approximately 23 AADT along the nearby Foster Lane; i.e. very much below the screening criteria. As such, it is reasonable and in accordance with applicable guidance to screen out the potential for significant air quality effects at the Ashington Church of England First School on this basis, without the need to undertake atmospheric dispersion modelling of impacts at the school; for this reason, a receptor representing the school has not been included within the model.

It should also be noted that modelled receptors along Church Lane (i.e. receptors E1-E6 and E8) have all been predicted to experience 'negligible' impacts, with predicted pollutant concentrations falling well below the applicable national objectives (see Table 5-2, Table 5-3 and Table 5-4 of the AQA). Taking into consideration the higher volumes of baseline and development traffic along Church Lane as compared to Foster Lane, it is reasonable to expect that air quality conditions at the modelled receptors adjacent to Church Lane will be more worst-case than at the school; given that impacts at these receptors have been found to be acceptable it is, therefore, reasonable to expect that conditions at the school will also be acceptable.

As such, for the reasons stated above, we feel that the AQA appropriately addressed the potential for impacts at the Ashington C of E First School.

In response to your comment regarding monitoring *"Major applications should consider supplementing local authority monitoring with own monitoring - which would help to increase model certainty and confidence in the results."*

Atmospheric dispersion modelling has been undertaken to determine off-site impacts as a result of the proposed development. Atmospheric dispersion modelling is considered to be an appropriate alternative to monitoring. Furthermore, appropriate monitoring undertaken by the local authority has been used to verify the modelling undertaken.

As discussed within the AQA, the development Site is considered to experience background pollutant levels as a result of the lack of notable emissions sources (e.g. busy main roads) in close proximity to the Site. The AQA

demonstrates that background concentrations at the Site (as derived using tools provided by the Department for the Environmental, Food and Rural Affairs (Defra)) are well below the relevant national objectives. Taking into consideration the evidence above, it is considered that the further undertaking of a monitoring survey is not necessary in order to be able to demonstrate that air quality effects will be 'not significant' in this instance, as this conclusion is adequately supported by the evidence presented within the AQA.

In response to your comment regarding monitoring *"Monitoring should be considered on the Construction Mitigation Plan. As monitoring forms a vital part of construction, given the scale of the propose development, the likely high number of road traffic movements generated during the construction phase a monitoring plan should be included as a measure."*

A requirement to undertake monitoring of construction dust is included within Section 6 of the report. The AQA also recommends that a Dust Management Plan (DMP) be developed, which may include details of dust monitoring measures during the construction phase.

Monitoring of other pollutants associated with construction traffic tailpipe emissions is not considered to be necessary, as the AQA demonstrates that impacts of emissions associated with construction vehicles is likely to be 'not significant'.

In response to your comment regarding monitoring *"We request a real-time PM₁₀ continuous monitoring and deposition gauges"*. A requirement to undertake monitoring of construction dust is included within Section 6 of the report. This requirement does not specify the exact type of monitoring that should be undertaken, but it is considered that the type of monitoring implemented should be that which is most appropriate to the identified type and level of risk, as established by the Construction Dust Risk Assessment presented within the AQA. The Construction Dust Risk Assessment identifies that the development (without mitigation) poses a 'high risk' of dust soiling, but only a 'low risk' of human health impacts (see Table 5-1). As such, it is suggested that dust deposition monitoring would be more appropriate in this instance than real-time PM₁₀ monitoring, as dust deposition monitoring is more appropriate for considering dust soiling (identified as being of comparatively higher risk) whilst PM₁₀ monitoring is more applicable to consideration of human health impacts (identified as being of 'low risk' only). It is worth noting that in instance where there is considered to be a 'low risk' of impacts (i.e. human health impacts in this instance), the relevant guidance (i.e. the IAQM's 'Guidance on the Assessment of Dust from Demolition and Construction') does not require that monitoring be undertaken.

In response to your comment regarding damage costs *"Damage costs: Please send a list of proposed mitigation measures"*.

A selection of possible mitigation options is detailed within Paragraph 6.7 of the AQA, which also calculates damage costs (Table 5-6) and notes that the cost of the final selection of mitigation measures should be equal to or greater than this sum.

The final selection of measures has not yet been undertaken, as it is often easier to select the final mitigation package at a later stage in the planning process (e.g. by way of a planning condition) when the damage costs have been accepted and agreed.

In response to your comment *"Construction Phase. During site clearance, preparation and construction there is the potential for local residents to experience adverse impacts from noise, dust and construction traffic movements. These should be minimised and controlled by the developer and a construction environmental management (CEMP) plan will be recommended as a condition."* This is considered to be reasonable and appropriate from an air quality perspective.

I hope that the above responses address your concerns. If you have any residual queries or concerns regarding the above, or if there is anything else that you would like to discuss, then I would be most happy to speak with you further at your convenience.

Kind regards,

Nicole Holland

Principal Air Quality Scientist

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