

**Air Quality Assessment  
Report**

**Eastbourne Road,  
Willingdon**

**Prepared for  
Danescroft (FREOF V Willingdon) LLP**

**by**

**Stuart Michael  
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## ACRONYMS AND ABBREVIATIONS

|                   |                                                                            |
|-------------------|----------------------------------------------------------------------------|
| ATC               | Automated Traffic Count                                                    |
| AQAP              | Air Quality Action Plan                                                    |
| AQMA              | Air Quality Management Area                                                |
| DEV               | Development generated traffic                                              |
| DEFRA             | Department for Environment, Food and Rural Affairs                         |
| DfT               | Department for Transport                                                   |
| DMRB              | Design Manual for Roads and Bridges                                        |
| EFT               | DEFRA Emissions Factor Toolkit                                             |
| g/km/s            | grams per kilometre per second                                             |
| ha                | Hectares - a unit of measure equal to 2.471 acres or 10,000 m <sup>3</sup> |
| HGV               | Heavy Goods Vehicle                                                        |
| IAQM              | Institute of Air Quality Managements                                       |
| MCC               | Manual Classified Traffic Count                                            |
| ms <sup>-1</sup>  | wind speed in meters per second                                            |
| NAQO              | National Air Quality Objectives (2002)                                     |
| NSCA              | National Society for Clean Air                                             |
| NO <sub>2</sub>   | Nitrogen Dioxide                                                           |
| NO <sub>x</sub>   | Oxides of Nitrogen                                                         |
| NTM               | National Transport Model                                                   |
| PM <sub>10</sub>  | Particulate matter with an aerodynamic diameter less than 10 microns       |
| PM <sub>2.5</sub> | Particulate matter with an aerodynamic diameter less than 2.5 microns      |
| SMA               | Stuart Michael Associates Limited                                          |
| TEMPRO            | Trip End Model Presentation Program                                        |
| UoK               | the University of Kent                                                     |
| WDC               | Wealden District Council                                                   |
| µgm <sup>-3</sup> | Micrograms per cubic meter                                                 |



## **1.0 EXECUTIVE SUMMARY**

- 1.1 This Report has been produced by Jason Mills with respect to an Appeal by Danescroft (FREOF V Willingdon) LLP, the Applicant.
- 1.2 The Author of this report has over fifteen years' experience in the private sector specialising in the assessment and management of matters relating to air quality for residential development.
- 1.3 In this report I set out my experience then describe the scope of review, the planning background, local air quality, the application details, applicable National and Local policies that have been used to develop the robust proposals presented for this site.
- 1.4 A review of the local air quality presented in Wealden District Council Annual Status Report (2020) indicates that concentrations of pollutants within Wealden District are well below the National Air Quality Objective levels of  $40 \mu\text{g m}^{-3}$  for Nitrogen Dioxide ( $\text{NO}_2$ ). This is also confirmed by the background concentrations within the Ordnance Survey grid square the Site falls into as published by DEFRA for England.
- 1.5 Construction nuisance dust and  $\text{PM}_{10}$  health effects have been assessed at local sensitive receptors. During the Demolition, Earthworks, Construction phases of development, there is a Medium to Low Risk of potential annoyance to people and property caused by dust soiling and a Low Risk of health effects due to an increase exposure in  $\text{PM}_{10}$ . Therefore, mitigation specific to construction may be required.
- 1.6 During the Trackout processes, there is a Low Risk of dust soiling and a Low Risk to human health effects due to an increase exposure in  $\text{PM}_{10}$ . No specific mitigation measures are required beyond specific legislation.
- 1.7 Development generated road traffic would result in an increase in road traffic flows of 4.1% or less with the largest change adjacent to the site access. The change in road traffic flows results in an "Imperceptible" ( $<0.4 \mu\text{g m}^{-3}$ ) change in  $\text{NO}_2$  and  $\text{PM}_{10}$  which is considered "Negligible Significance".
- 1.8 Within the Site, concentrations of  $\text{NO}_2$  and  $\text{PM}_{10}$  are well below the National Air Quality Objective levels of  $40 \mu\text{g m}^{-3}$ .



- 1.9 With regard to air quality at the proposed development site, local air quality monitoring by WDC and the results from the air quality assessment demonstrate that there are no constraints on the development. Furthermore, impacts on pollutant levels at local sensitive receptors is deemed of “Negligible” significance using IAQM guidance.



## **2.0 QUALIFICATIONS AND EXPERIENCE**

- 2.1 My name is Jason Peter Mills. I hold a Master of Engineering Degree in Environmental Engineering, a Master of Science Degree in Air Pollution Management and Control and a Post Graduate Diploma in Acoustics and Noise Control. I am an Associate Member of the Institute of Acoustics. I have over fifteen years of experience in the assessment and management of noise and air quality matters. I have assisted private sector clients in relation to assessing and mitigating against the impacts on air quality from traffic, rail and industrial sources.
- 2.2 I am a Senior Environmental Engineer at Stuart Michael Associates (SMA), an independent consultancy that specialises in transportation and infrastructure planning, road safety audits, flood risk assessments, traffic, civil, structural and environmental engineering.
- 2.3 I have been instructed to produce a Report to accompany the Proof of Evidence submitted by David Neame. The report considers and address potential air quality issues which may be raised during the Public Inquiry. Stuart Michael Associates was appointed by Danescroft (FREOF V Willingdon) LLP (the Appellant) in July 2020 to advise upon the air quality considerations in connection with its proposal to submit a planning application for a residential development along with a medical centre on land at Hindsland, Eastbourne Road, Lower Willingdon (the "Site").



### 3.0 SCOPE OF REVIEW

3.1 This Report has been produced to support the Proof of Evidence provided by David Neame. The Report covers potential air quality issues relating to the proposed development of land at Hindsland, Eastbourne Road, Lower Willingdon, BN20 9NU.

3.2 It should be noted that Wealden District Council (WDC) did not object to this proposal in terms of matters within my area of expertise and accepted the principles outlined in the Air Quality assessment report submitted as part of the planning application.

3.3 Polegate Town Council raised an objection and there have been some third-party objections which concern my discipline and these are summarised below:

- Polegate Town Council object on grounds that *“air quality will be diminished by added emissions from many extra vehicles”*.
- Third party objection due to *“increase in stationary traffic will affect air quality, increase in air pollution will affect health of existing residents”*.
- Third party objection due to *“increase in noise, dust and air pollution from additional traffic including construction traffic”*.
- Third party objection due to *“climate emergency needs to be considered and area could be planted with trees if no longer needed for agriculture, also would help air quality”*.
- Third party objection due to *“air quality exacerbated by tree felling programme on nearby South Downs”*.
- Third party objection due to *“negative impact on locality and nearby properties – noise, disturbance, light pollution and an increase in traffic fumes, loss of daylight and loss of privacy”*.

3.4 This Report therefore covers the following:

- A review of the Air Quality assessment; and
- A review of the changes in pollutant levels at existing sensitive receptors.



- 3.5 The evidence I have provided for this Appeal in this Report has been prepared and is given in accordance with guidance provided by my Professional Institution. I confirm that the opinions expressed are my true and professional opinions.



#### 4.0 BACKGROUND

4.1 The Appeal site extends to an area of approximately 6.48ha and is currently occupied by one vacant dwelling adjacent to the Site access and a derelict playing field on the northern side of Eastbourne Road approximately 1.6km north of central Willingdon.

4.2 The Appeal Site comprises former sports pitches, the construction of which necessitated extensive engineering works, the implementation of artificial drainage and the inclusion of amenity grass species.

4.3 The description of the proposed development is as follows:

*Outline Application with all matters reserved except for access (excluding internal estate roads beyond the access to serve the medical centre plot) for demolition of existing vacant dwelling and erection of up to 180 no. dwellings and medical centre together with all parking, servicing and on-site open space.*

4.4 The application is supported by a masterplan to demonstrate how the site could satisfactorily accommodate the proposed number of dwellings.

4.5 An air quality assessment of the Appeal Site was undertaken in February 2021.

4.6 A review of the local air quality, as published by WDC in the 2020 Annual Status Report (ASR), was undertaken and the results were presented in the air quality assessment (REF. CD10.1, Section 4, pages 17 to 23).

4.7 Local Authorities have been required, under sections 82-84 of the Environment Act 1995, to carry out a review of local air quality within their boundaries to assess areas that may fail to comply with the National Air Quality Objectives (NAQO) (annual average of 40 micrograms per meter cubed ( $\mu\text{gm}^{-3}$ ) for Nitrogen Dioxide ( $\text{NO}_2$ ) and Particulate matter with an aerodynamic diameter of less than 10 microns ( $\text{PM}_{10}$ )). In areas where these objectives are unlikely to be achieved, local authorities must designate these areas as Air Quality Management Areas (AQMA's) and prepare a written Action Plan to achieve the NAQO.

4.8 WDC undertakes passive monitoring via diffusion tubes (DT) of  $\text{NO}_2$  at a number of sites within its administrative boundary and works with the neighbouring borough of Eastbourne (EBC) to monitor  $\text{PM}_{10}$ , Particulate matter with an



aerodynamic diameter of less than 2.5 microns ( $PM_{2.5}$ ) and Ozone ( $O_3$ ) via continuous monitoring.

- 4.9 At the end of 2019 there were 10 active sites monitoring  $NO_2$  via DT at a mixture of “Kerbside”, “Roadside”, “Background” and “Urban Background” locations in the WDC area.
- 4.10 The closest DT to the development site is W5 located adjacent to Eastbourne Road, Polegate and records “Roadside” concentrations which have been well below the NAQO for the past five years ( $30 \mu g m^{-3}$  in 2015,  $29.3 \mu g m^{-3}$  in 2016,  $30 \mu g m^{-3}$  in 2017,  $32.6 \mu g m^{-3}$  in 2018 and  $27.4 \mu g m^{-3}$  in 2019). Concentrations in 2020 were recorded as  $19.9 \mu g m^{-3}$  which is well below the NAQO and when compared to previous years, reflects the reduction in road traffic due to the Covid pandemic. It should be noted that concentrations of  $NO_2$  up to 2020 do not show a distinctive trend in change and have remained fairly constant. Therefore, the air quality assessment was undertaken using 2019 background concentrations for the Base year and Future year scenarios.
- 4.11 In addition to the above, the air quality assessment addressed the effects of air pollutant emissions from road traffic using the adjacent roads and the way they impact the site and surrounding area. Also considered were the emissions associated with the construction of the proposed Development.
- 4.12 The report was split into two parts; the first part assessed the impact of the development on surrounding sensitive receptors and the second part assessed the constraints on the development (i.e. how the existing environment will impact on the development).
- 4.13 Road traffic flows on the local highway network were obtained from permanent automatic traffic counters (ATC) and from traffic surveys undertaken by the Transport Consultants. Where necessary, the surveyed traffic flows were growthed to the assessment years using TEMPRO and adjusted using NTM.
- 4.14 The dispersion modelling software ADMS Roads was used to determine the concentrations of pollutants at the development site and assess the likely changes in the concentrations of pollutants. Background concentrations of pollutants were obtained from the Department for Environment Food and Rural Affairs (DEFRA) website.



- 4.15 Construction dust impacts on local receptors was assessed using the method detailed in the Institute of Air Quality Management (IAQM) publication “Guidance on the assessment of dust from demolition and construction” (2014).
- 4.16 The principles in the IAQM document “Land Use Planning & Development Control: Planning for Air Quality” (January 2017) were considered when undertaking the air quality assessment.
- 4.17 In addition, Sussex-air guidance document, Air quality and emissions mitigation guidance for Sussex (2020), was considered when recommending appropriate mitigation measures.
- 4.18 The report assessed the overall levels of oxides of nitrogen ( $\text{NO}_x$ ), nitrogen dioxide ( $\text{NO}_2$ ) and particulate matter with an aerodynamic diameter of less than 10 microns ( $\text{PM}_{10}$ ) and 2.5 microns ( $\text{PM}_{2.5}$ ) within the development site and at sensitive receptor locations. The resultant concentrations were assessed against the National Air Quality Objectives (NAQO's). The impacts on the Ashdown Forest SPA were also considered. The base year for the development is 2021 and the future year of assessment is 2030, which is the predicted year of opening. Verification was undertaken for 2019.



## 5.0 POLICY BACKGROUND

- 5.1 The application design has been prepared in accordance with the relevant National and Local Policies as listed below.

### National Policy

| Policy                                                          | Key Provisions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>National Planning Policy Framework (NPPF) (updated 2021)</b> | <p>Paragraph 186. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.</p> <p>187. Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.</p> <p>188. The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be</p> |



revisited through the permitting regimes operated by pollution control authorities.

**Planning Practice Guidance (PPG)**

Action to manage and improve air quality is largely driven by EU legislation. The 2008 Ambient Air Quality Directive sets legally binding limits for concentrations in outdoor air of major air pollutants that impact public health.

## Regional Policy

| Document                                                               | Key provisions and policies                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Air Quality and Emissions Mitigation Guidance for Sussex (2020)</b> | <p>“Air quality is a material consideration in deciding a planning application. The purpose of this document is to:</p> <ol style="list-style-type: none"> <li>1) provide clarity to how authorities intend interpreting relevant Local Plan policies.</li> <li>2) provide advice for developers and their consultants on how to assess and mitigate the impact that new developments may have on local air quality.</li> <li>3) detail a consistent approach by developers and Local Planning Authorities (LPAs) to: <ul style="list-style-type: none"> <li>• address impacts on local air quality</li> <li>• ensure optimum scheme design to reduce emissions and/or exposure and</li> <li>• avoid unnecessary delays in the planning process.”</li> </ul> </li> </ol> |

## Local Policy

| Document                                                             | Key provisions and policies                                                                                                                                                                                                                                        |
|----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Wealden District Development Plan</b>                             | The Council’s current statutory development plan consists of the adopted Wealden District Core Strategy Local Plan (February, 2013), the ‘saved’ policies of the adopted Wealden Local Plan (1998) and the Affordable Housing Delivery Local Plan (May, 2016)      |
| <b>Wealden District Local Plan (1998)</b><br><i>(saved policies)</i> | <p>The WDC CS does not present specific policies relating to air quality.</p> <p><b>Saved Policy EN1</b></p> <p>The Council will pursue sustainable development, having regard to the principles contained in Government guidance and its own Strategy for the</p> |



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Environment, in considering the location, layout and design of development, renewable energy and waste management proposals and in assessing the effects of proposals on the environment, including on water and air quality

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## 6.0 PROPOSED DEVELOPMENT

- 6.1 The Site is located at East Bourne Road, Willingdon, BN26 5BE (Grid ref: 558459E, 104149N), approximately 1.6km north of central Willingdon. The site lies to the north east of the A2270 Eastbourne Road, between existing residential dwellings to the north and open agricultural land to the east. On the south west side of Eastbourne Road are existing residential dwellings. The development site is situated within the area administered by Wealden District Council (WDC).
- 6.2 WDC have not declared any Air Quality Management Areas (AQMA), therefore the proposed development site is not located within or close to an Air Quality Management Area AQMA.
- 6.3 At the time of undertaking the air quality assessment, WDC 2020 ASR concluded that "This Annual Status Report confirms that concentrations within Wealden continue to be well within the NO<sub>2</sub> annual mean air quality objective at relevant locations. No significant changes in emissions sources within the Council's area have been identified in the last year."
- 6.4 Since then the 2021 ASR has been published by WDC and it concluded that "This Annual Status Report confirms that concentrations within Wealden continue to be well within the NO<sub>2</sub> annual mean AQS objective at relevant locations. No significant changes in emissions sources within the Council's area have been identified in the last year".
- 6.5 Following the completion of the development, there is predicted to be an increase of 4.1% or less in 24-hour traffic flows along the links within the assessment area (CD10.1, paragraph 5.17, page 30). The predicted increase of 4.1% is adjacent to the Site access on A2270 Eastbourne Road (CD10.1, Table 5.3, page 30).
- 6.6 The concentrations of NO<sub>2</sub> in 2030 are predicted to be well below the objective level of 40 µgm<sup>-3</sup> (CD10.1, Table 5.5, page 31). The magnitude of change in annual mean concentrations at all the receptors due to development generated traffic is predicted to be "Imperceptible" (<0.4 µgm<sup>-3</sup>) (CD10.1, Table 3.7, page 13). Therefore the "Significance" of change is considered to be "Negligible" (CD10.1, Table 3.8, page 14).
- 6.7 Concentrations of PM<sub>10</sub> are predicted to be below the objective level of 40 µgm<sup>-3</sup> (CD10.1, Table 5.5, page 31) at the receptor locations and experience



“Imperceptible” ( $<0.4 \mu\text{gm}^{-3}$ ) due to development generated traffic (CD10.1, Table 3.7, page 13). Therefore the “Significance” of change is considered to be “Negligible” (CD10.1, Table 3.8, page 14).

- 6.8 During the Demolition, Earthworks, Construction phases of development, it was assessed that there is a Medium to Low Risk of potential annoyance to people and property caused by dust soiling and a Low Risk of health effects due to an increase exposure in  $\text{PM}_{10}$  (CD10.1, Table 5.2, page 29). Therefore, mitigation may be required (CD10.1, paragraph 5.11, page 29).
- 6.9 During the Trackout processes, there is a Low Risk of dust soiling and a Low Risk to human health effects due to an increase exposure in  $\text{PM}_{10}$  (CD10.1, Table 5.2, page 29).
- 6.10 For those cases where the risk category is Negligible (i.e. ecological), no specific mitigation measures is required beyond specific legislation.
- 6.11 With regard to potential impacts to the Ashdown Forest SPA, it has been demonstrated that impacts adjacent to the development site are “Negligible”. Therefore, any impacts at the SPA which is 25 km from the site will be “Negligible”.
- 6.12 Within the development site concentrations of  $\text{NO}_2$  are predicted to be well below the NAQO levels  $40 \mu\text{gm}^{-3}$ , therefore no mitigation is proposed (CD10.1, Table 3.10, page 16).



## **7.0 CONCLUSIONS**

- 7.1 Based on the results of the AQA, it has been demonstrated that the impact of construction operations on local air quality would be acceptable with appropriate mitigation that have been proposed.
- 7.2 Moreover, during the operational phase of the proposed development the change in pollutant concentrations is imperceptible, background concentrations are well below annual mean air quality strategy objective levels, therefore impacts on pollutant levels at local sensitive receptors is deemed of “Negligible” significance using IAQM guidance.
- 7.3 With regard to air quality at the proposed development site, local air quality monitoring by WDC and the results from the air quality assessment demonstrate that there are no constraints on the development. Therefore, the scheme is compliant with all relevant policies and guidance for air quality.