DRAFT

Pelham / Appendix to Matter 14

Reception

From: Dave Pitt <davepitt@davidjarvis.biz>
Sent: 18 January 2012 17:50
To: Reception
Subject: Fwd: Wealdeon Core Strategy AQ note

Sent from my iPhone

Begin forwarded message:

From: Adam Glass <[redacted]
Date: 18 January 2012 17:34:36 GMT
To: "[redacted]" <[redacted]>
Cc: Neil Warren <[redacted]>, "davepitt@davidjarvis.biz" <davepitt@davidjarvis.biz>
Subject: Wealdeon Core Strategy AQ note

Stuart,

Here's a first pass for initial response tomorrow

The SEC assessment procedure has followed the Design Manual for Bridges Volume 11 Section 3 Part 1 HA207/07 Annex F – Assessment of Designated Sites to calculate highway capacity. The Annex F assessment procedure was prepared by in collaboration with the Joint Nature Conservation Committee and Natural England and is the established procedure for assessing the impact of road traffic on Designated Sites.
The review by AQC does not make the distinction between a review of Strategy Level HRA assessments (as detailed in the Habitat Regulations) and an investigation into the highway capacity and appears to be reviewing the SEC note against Local Air Quality Management requirements as detailed in Part IV of the Environment Act . The SEC note follows from the HRA Strategy assessments and uses a similar methodology at a strategic level.

Pollutants considered
The AQC review of the air quality submission to Wealden Council questions why there is not assessment against the 24-hour Critical level for NOx and acidity critical loads.
Annex F assessment method does not assess against these criteria. Technically the 24-hour mean Critical level of 75 μgm^{-3} applies to all pollutants but is not widely used (including in AQC reports) as the annual mean NO_x is the more rigorous level. Acidity critical loads are not detailed in the Annex F method but N acid deposition can be calculated from the Nitrogen Deposition given on Table 3.

Model Chosen
The assessment procedure has followed the Design Manual for Bridges Volume 11 Section 3 Part 1 HA207/07 Annex F – Assessment of Designated Sites. This assessment procedure was prepared by in collaboration with the Joint Nature Conservation Committee and Natural England and is the established procedure for assessing the impact of road traffic on Designated Sites. Annex F

This is the same method used for the Appropriate Assessment of the Pevensey Levels Ramsar Site. The Habitat Regulations Assessment of the Wealden Core Strategy also used the DRMB HA207/07 screening criteria, which Natural England use, to indicate if further assessment is needed.

Para 2.4 details a response about DMRB and 'Detailed Assessment'. Detailed Assessment is a Local Air Quality Management term detailed in Part IV of the Environment Act referring to the assessments conducted to declare an Air Quality Management Area. The assessment was not a 'Detailed Assessment' for the declaration of an AQMA and it would not be appropriate to put these requirements on all other assessments, in particular strategic level assessments as the relevant data may not yet exist.

TG09 para 2.20 states, with '*Where the DMRB assessment indicates that exceedences of the objectives are likely, a more detailed study may then be required. This may include the use of more complex dispersion models, and/or the use of local monitoring. However, where a good agreement between the DMRB model results and monitoring (at relevant locations) is demonstrated, then the results*
of the DMRB model should, in many instances, be sufficient to determine the area of exceedence of the objective'.
There is unlikely to be monitoring data as the sites are in rural areas as the NOx and NO_2 levels are low, unlikely to exceed objectives. Exceedance of the NOx objective is indicated to be unlikely as the calculated NOx levels are 10μgm^{-3} or below the Critical Level for NOx.

Annex F of HA207/07 remains the accepted assessment methodology for assessment of European Sites and is that referred to by the HA and Natural England.

Assessment location
A location 20 m from the road centreline was used to represent the point closest to the road that isn't classified as roadside strip, subject to salt spray, vegetation clearance etc.
It should also be recognised that concentrations and deposition fluxes in 2026 are expected to be much smaller than those in 2010 even with the proposed housing allocations. It thus seems probable that the vegetation in these "roadside strips" would be relatively insensitive to these inputs.

Future Year predictions
Predicting pollutant concentrations in a future year will always be subject to greater uncertainty. For obvious reasons, the model cannot be verified in the future, and it is necessary to rely on a series of projections as to what will happen to background pollutant concentrations, and to vehicle emissions. These projections are based on emission factors published by DfT.

Calculations carried out
The calculations were carried out for the difference between the TBR and CS as the TBR has had HRA assessment conducted and the SEC assessment was conducted to see if there was further impact beyond that detailed in the HRA.
The AADT headroom is that additional AADT above the TBR needed to get the DMRB spreadsheet to calculate NOx levels over 30μgm^{-3}.

Conclusion
Annex F of HA207/07 remains the accepted assessment methodology for assessment of European sites and is that referred to by the HA and Natural England.
The AQC review appears to get confused over the appropriate assessment methodologies and details the methods to declare an AQMA, not conduct strategic level assessment, as required by the Habitat Regulations. Further HRA assessment of the European Sites would be carried out at the project level including detailed calculations

Kind regards,

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