

Radwinter Road

Air Quality Position Statement

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Quality information

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1. Introduction

- 1.1 This technical note been prepared to set out the Rule 6 Party's position on Air Quality in the Planning Appeal Hearing of planning application UTT/21/2509/OP - Land south of Radwinter Road (east of Griffin Place):

Outline planning application for the erection of up to 233 residential dwellings including affordable housing, with public open space, landscaping, sustainable drainage system (SuDS) and associated works, with vehicular access point from Radwinter Road. All matters reserved except for means of access.

- 1.2 Planning Appeal number: APP/C1570/W/22/3296426
- 1.3 All documents associated with the planning application are available at <https://www.uttlesford.gov.uk/article/4863/Comment-or-search-for-a-planning-application> by searching for UTT/21/2509/OP.
- 1.4 As part of the proofs of evidence submitted by the Rule 6 Party, a report was prepared by AECOM reviewing the air quality assessment submitted as part of the Environmental Statement (and Addendum) for the Planning Application. In summary, the points raised were:
- Potential underestimation of future baseline traffic volumes;
 - Underestimation of background concentrations (baseline and future), resulting in underestimation of total concentrations, and affecting the verification factors;
 - Lack of consideration for street canyons within Saffron Walden, potentially underestimating pollutant concentrations;
 - Lack of weight given to the whole Air Quality Management Area (AQMA); and
 - Lack of consideration of health impacts of air quality and World Health Organisation (WHO) guidelines suggesting harm is caused at much lower concentrations than the current Air Quality Strategy (AQS) objectives account for.
- 1.5 The Appellant subsequently engaged a new Air Quality Consultant who has re-done the air quality assessment, taking on board the comments in AECOM's review document. This report (Radwinter Road, Saffron Walden, Air Quality Modelling, August 2022, Air and Acoustics Consultants (AAC)) has been duly considered by the Rule 6 Party.

2. Review of Revised Modelling

- 2.1 The updated modelling approach is clearly set out, and Figure 3.1 in the updated report clearly sets out the receptor locations in context with the AQMA. Figure 3.1 demonstrates that the AQMA has been considered fully.
- 2.2 The updated modelling report discusses the planning applications that were not included in the baseline data, and further describes their status:

***UTT/22/1939/DFO (UTT/17/3413/OP)** – Traffic flows taken from 2013 application – difference between trip generation from different applications is negligible so the use of 2013 traffic data is robust. Furthermore, the traffic associated with 40 dwellings from this application were removed from the committed development trips, as the dwellings were occupied at the time of conducting the traffic surveys;*

***S62A/22/0000002** – This application was submitted after UTT/21/2509/OP and is yet to be determined, so cannot be considered a committed development and was therefore not considered further;*

***UTT/0400/09/OP** – The residential element for this development was built out by the time traffic survey were conducted. The employment site for this development was applied under a*

separate reserved matters application, and the planning permission for this has now lapsed. Therefore, no further considerations were made for the employment element; and

20/2007/FUL – *This development was undetermined at the time of the assessment works; however the Highway Authority requested that this be treated as a committed development. Therefore, this development was considered within the traffic flows.*

- 2.3 The Rule 6 Party still believes that traffic data has not been adequately prepared for the Application, however, it accepts these committed developments inclusions/exclusions.
- 2.4 The modelling methodology is much improved over the original assessments. AAC has slowed traffic speeds at junctions, following LAQM.TG(22), and utilised an average diurnal profile from the Department of Transport. In addition, street canyons have been added along High Street, Bridge Street and Hill Street.
- 2.5 An updated verification has been undertaken, with a resulting adjustment factor of 1.9, and an RMSE of 3.6. An adjustment factor of 1.9 shows that the modelling was underestimating concentrations at monitoring locations, which is not unusual. The adjustment factor is not large, showing that the model has taken account of the local conditions well. After adjustment the RMSE is 3.6 – less than 10% of the Annual Mean Objective for NO₂. This shows that the model is robust and suitable for use.
- 2.6 The revised modelling results in higher concentrations than the previous assessment. This results in one receptor experiencing a moderate adverse impact. This is likely due to the presence of the street canyon magnifying changes in this location. The proposed signalised junction at Church Street/High Street may also contribute to the increase at this location (although the changes are in the baseline and the with-scheme scenario). It should be noted that the increase is localised, and the two receptors either side show a negligible impact. Taken as a whole, the development is not considered to have an adverse impact, which is in line with IAQM guidance. No locations are shown to exceed any of the AQS objectives.

3. Conclusions

- 3.1 The air quality assessment presented in the AAC report is technically good. It addresses the majority of the concerns raised in AECOM's previous technical note. As such, the Rule 6 Party accepts the findings of the revised air quality assessment.
- 3.2 Notwithstanding this technical acceptance, the Rule 6 Party still believes that any worsening of air quality within an AQMA is not ideal, and urge the Inspector to consider the WHO evidence that even "good" air quality can have adverse health impacts when considering the merits of the development.

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