Issue 2 – Air Quality

Question 41 – Measures set out in Policy AF2

Policy AF2 on Air Quality has some serious faults. It includes ‘proposals’ which are not in the Local Plan and have no status as Transport Policies.

Policy Af2 lists areas in the District which are affected by nitrogen deposits or other forms of pollution, including Pevensey Levels SAC and Ramsar site, and Lewes Downs SAC.

Para 5.20-5.21 of the Local Plan state: "An air quality assessment has been undertaken as part of the Habitats Regulations Assessment for the Lewes Downs SAC. Estimated background levels for nitrogen oxides and ammonia are currently below the critical level for nitrogen oxides and ammonia. However, Lewes Downs SAC is currently predicted to be above the critical load for nutrient nitrogen deposition."

Para 5.23 states: "Lewes Downs is already in a position where the critical load and therefore its environmental limit is exceeded. The Wealden Local Plan in combination is likely to make air quality conditions worse through elevated concentrations and deposition fluxes as well as an increase in the area of the SAC affected by the exceedances of the critical levels and loads. In the worst case scenario by 2028 this will affect the calcareous grassland as opposed to the scrubland on the slopes of the SAC."

Policy AF2 refers to this only in the context of the A26, but the business A27 (a trunk road) which runs along the south side of Mount Caburn will also be having a similar effect.

A general reduction of road traffic is the most effective way to limit this harm. Location of development that minimises car traffic and maximises use of sustainable modes of transport (walking, cycling, bus, train) would be a the right framework to improve air quality and contribute to the achievement of sustainable development

But Policy AF2 supports two transport proposals that would have the opposite effect, worsening air quality. It states:

"In order to mitigate the impacts of development, the Council:

• Supports provision of an off-line A27 to provide an alternative route to roads crossing the Ashdown Forest SAC and Lewes Downs SAC;"
• Supports the reinstatement of the Lewes to Uckfield Train Line and an upgrade to Uckfield-Buxted-Crowborough-Tunbridge Wells Railway line including services; and
• Supports creation of Polegate Parkway Station/ or alternative parking capacity in South Wealden."

The reopening of the Lewes-Uckfield line and upgrading of the line from Uckfield northwards (with both electrified) would contribute to improvement in air quality, more so if the line was electrified and not operated by diesel trains as now. But the opposite effect on air quality would result from a new off-line A27 or a Polegate Parkway Station would assist improvement of Air Quality. The high volumes of traffic that a new off-line A27 would bring to the area between Lewes and Polegate would increase air quality problems, with the effects described at paras 5.21-5.23 likely to be greater on the South Downs SACs than the present levels of traffic create.

The Local Plan does not propose an off-line A27: there is no route or corridor shown on the Local Plan Policies Map or any other plan included in the Plan.

A Polegate Parkway station (no location is given) would generate additional traffic in the Polegate area next to the South Downs National Park and heritage assets, add to the levels of queueing at the A27/A22 Cophall roundabout outside Polegate, and create urban sprawl west of Polegate contrary to other policies of the Plan, while conflicting with the purposes of the South Downs National Park, and undermine the frequency of services to the existing well-located station in Polegate town centre.

There is no proposal for a Polegate Parkway Station in the Local Plan and no consultation on any such concept has taken place.

Both references, to an off-line A27 and to a Polegate Parkway Station, should be deleted from Policy AF2. They are both contrary to the wider principles of sustainable development.