Wealden Local Plan Examination
Written Submission Regarding the Recently Published IAQM Guidance
“A Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites” Prepared by Dr Paul Bond on behalf of Fairfax Acquisition Ltd

DATE OF ISSUE: 23 JULY 2019
ISSUE: 00
HM REFERENCE: 21648/18-RP-SU-001

EIP HEARING SESSIONS

WORD COUNT: 497 WORDS (EXCLUDING NUMBERING AND TITLE PAGES)
PROJECT NAME: EIP HEARING SESSIONS
REPORT NAME: Wealden Local Plan Examination
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ISSUE: 00

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DOCUMENT HISTORY:

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1. Introduction

1.1 The IAQM is a highly respected Institution and the principal professional body for air quality professionals. Its mission is to be the authoritative voice for air quality by maintaining, enhancing and promoting the highest standards of working practices in the field.

1.2 It has previously produced a number of guidance documents on air quality, including:

   I. “Air Quality Monitoring in the Vicinity of Demolition and Construction Sites”, 2018;
   II. “Guidance on the Assessment of Odour for Planning”, 2018;
   III. “Guidance on Land-use Planning and Development Control: Planning for Air Quality”, 2017; and

1.3 From my experience, these guidance documents are recognised as industry standards and the methodologies presented therein are considered best practise by air quality consultancies, Local Authority Environmental Officers and Planners alike.

1.4 As such, the new IAQM guidance on Air Quality Impacts on Designated Nature Conservation Sites should be considered best practise and a material consideration when evaluating air quality practise and policy relating to the Ashdown Forest SAC within the Wealden LP.

2 Main Issues

2.1 The main areas of divergence between the IAQM best practise guidance and Wealden District Council’s (DC) approach to Ashdown Forest SAC air quality impacts include:

   I. Para. 5.3.8 - the distribution of qualifying features across the SAC should be considered. If there are no qualifying features sensitive to air pollution within 200 m of a road, then no further assessment is required. Similarly, in para 5.3.15 – if the relevant habitat feature/species is not present in the study area, a conclusion of no likely significant effect can be reached without undertaking any modelling. Natural England (NE) also supports the qualifying features approach. Wealden DC does not agree with this approach, stating that all of the lands and habitats within the SAC boundary must be considered.

   II. Para. 6.8 – the air quality calculations should make reasonable assumptions about expected changes in baseline NO2 concentrations and thus the assumption of “no improvement” over the plan period is not a realistic one. Para. 5.4.2.5 states that although it is important that a conservative estimate is used for modelling, Defra’s current EFT (v9) may overestimate emissions over the longer term. This is because it does not reflect recent developments in either national policy nor in purchasing trends relating to diesel and non-conventional cars. Conversely, Wealden DC maintains that Scenario “A”, which assumes no improvement over the plan period, is both ‘scientifically’ and ‘legally’ the correct scenario on which to base the LP. NE considers that Scenario “A” is wholly unreasonable and is not realistic.

   III. Use of the 1% Critical Load (CL)/ Critical Level (CLE) level (in-combination) is advocated throughout the document (e.g. Table 4.1 and Paras. 5.5.1.7, 5.5.4.2, 5.5.4.4 etc). 1% of CL/CLE is also considered by NE’s air quality specialists to be suitably precautionary, as any emissions below this level are widely considered to be imperceptible. Conversely, Wealden DC are of the opinion that the 1% approach is not appropriate.
23/07/19

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