

Harrison, Liz

From: Pyke, Jon
Sent: 14 April 2023 10:27
To: Harrison, Liz
Cc: Scott, Neil
Subject: RE: F/22/93194 - Ageas Bowl - Air Quality consultation response required

Good morning, Liz

Further to our discussion, we comment on the air quality assessment report with respect to the human environment. This includes for construction and operation. We see there is consideration for the ecology, and this is best reviewed by colleagues.

Our comment here is on the question of whether this is an acceptable use of land from the perspective of air quality impact. Regarding noise impact, we commented on this before and doubt that it is.

Focussing first on operational impact, this depends upon traffic generation or induced traffic on the local highway network, and this includes Air Quality Management Area. The effect of this has been modelled quantitatively as we would expect for development of this magnitude and potential impact. One of the matters for concern is the number of events or peak days of traffic when there is potential for exceedance of short-term Air Quality Objectives. Current (or last observed with reasonable accuracy and compared to quantitative modelling output) the number of days of exceedance of ten or less micron diameter particular matter is three whereas the objective or limit is 35 days. With development, this increases by one day. For small or fine particulate matter (2.5 or less microns) are a small fraction of limit. With respect to nitrogen dioxide, the short-term hourly contribution from the development would be small based upon ratio to the annual mean contributions. Travel plans are proposed for the residential and workplace elements of the development and of course electric vehicle charging facilities for which there is mandatory minimum requirement and could be increased for the reason of least regret in the future.

For onsite development such as dwellings and homes, compliance is predicted by comparison to existing roadside sensitive receivers. For this reason, the report proposes the site is considered suitable for its intended use.

Of course, underpinning the assessment is a traffic engineering model and we must ask colleagues for comment on this as to whether the assumptions or forecasts are reasonable. The annual average weekday traffic used in assessment of air quality are presented in Appendix C. We are not provided with short term data say when events are held at the Ageas Bowl and an estimation of the number of events or days per year these might happen. Based on our discussion, this is stated elsewhere in the application documents.

For construction of a development of this size and proximity to sensitive receivers an air quality assessment is appropriate. The modelling predicts dust emissions from earthworks and construction and the impact these may have. A medium risk of dust soiling which can be a nuisance is predicted and low risk of health impact from small or fine particulate matter. This sounds acceptable, but we should consider the possible duration of the works as they may be perceived as medium or long term. If the development goes ahead, we would like to see specific mitigation measures in detail before works commence. We expect a Construction and Environmental Management Plan to be accompanied by a Construction Air Quality Management Plan or Dust Management Plan in proportionate detail and representing works as they are planned and programmed by the applicant's project manager or contractor.

We trust this is clear and helpful.

Kind regards
Jonathan

JonPyke

Pollution Control Officer

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