

The updated Air Quality Assessment (AQA) (P9258-R1-V4_Air Quality Assessment) has been reviewed.

As with the previous version, the assessment scope is considered appropriate and is based on a review of the proposed development, identification of nearby sensitive receptors, and consideration of Eastleigh Borough Council's monitoring data together with Defra background concentration maps.

The assessment considers potential impacts arising from construction dust, construction traffic and operational traffic. The construction dust assessment has been undertaken in accordance with IAQM guidance and identifies a high risk of dust soiling and a medium risk to human health prior to mitigation. The application of standard mitigation measures is accepted, and the conclusion that residual construction dust impacts would be not significant is supported, subject to implementation through an appropriately worded planning condition requiring a site-specific Construction Environmental Management Plan (CEMP).

The assessment of future occupants is also noted. Based on the information presented, the conclusion that future concentrations of NO₂, PM₁₀ and PM_{2.5} are likely to remain below the relevant Air Quality Objectives appears reasonable, yet the magnitude of change is unclear.

Concerns remain regarding the assessment of operational traffic impacts, in line with the introduction of the future sensitive receptors.

The assessment adopts the two-stage screening methodology described within the Environmental Protection UK (EPUK) / Institute of Air Quality Management (IAQM) "Land-Use Planning & Development Control: Planning for Air Quality" (2017). Paragraph 5.3.10 acknowledges that the proposed development will generate in excess of 500 AADT (732 AADT in total), which exceeds the indicative screening criterion identified within Table 6.2 of the guidance. The assessment subsequently concludes that no detailed assessment is required on the basis that development traffic will split approximately 50:50 between SID Road North and SID Road South, such that no individual road link would experience an increase exceeding 500 AADT.

This conclusion is not considered to be sufficiently evidenced.

The EPUK/IAQM methodology requires screening to be undertaken using predicted traffic changes on individual road links with relevant exposure. The submitted

assessment does not provide the underlying link-specific traffic data necessary to verify the screening exercise. In particular, the report does not include:

- baseline and with-development AADT flows for each affected road link;
- changes in LDV and HDV flows on each link;
- identification of the road links and relevant receptors considered within the screening assessment; or
- evidence demonstrating how the assumed 50:50 traffic distribution has been derived.

Whilst a 50:50 traffic split may ultimately be appropriate, this assumption should be supported by evidence within the Transport Assessment, such as traffic assignment, routing assumptions or junction modelling, rather than relying on a qualitative statement that traffic will disperse after leaving the site.

Particular consideration should also be given to the primary access routes serving the development and the influence of school-related traffic. During morning drop-off and afternoon pick-up periods, traffic is likely to be concentrated on particular routes rather than uniformly dispersed across the local highway network. These peak traffic characteristics should be reflected within the supporting transport evidence.

It is also noted that Paragraph 5.3.13 states that, in accordance with the EPUK/IAQM guidance, the impacts are considered to be "negligible" and that no further assessment is necessary. This interpretation is not considered to accurately reflect the guidance.

The criterion of 500 AADT presented in Table 6.2 of the EPUK/IAQM guidance is an "indicative screening criterion" used to determine whether a detailed air quality assessment should be undertaken. It is not a measure of air quality impact significance. The significance of impacts can only be determined, where required, by assessing predicted changes in pollutant concentrations at relevant receptors in accordance with the significance methodology presented in Table 6.3 of the guidance.

Accordingly, the conclusion that operational air quality impacts would be negligible has not been adequately demonstrated.

Consequently, the overall conclusion that air quality is not a constraint to the proposed development is not currently supported by sufficient evidence.

Further information is therefore required to substantiate the screening assessment, including:

- a link-by-link summary of baseline and with-development AADT flows;
- changes in LDV and HDV flows for each affected road link;
- identification of all relevant sensitive receptors along those links;
- justification of the traffic distribution assumptions through the Transport Assessment or supporting traffic modelling; and
- confirmation that no individual road link exceeds the applicable EPUK/IAQM screening criteria.

Should the additional information demonstrate that any of the EPUK/IAQM screening criteria are exceeded, a detailed operational air quality assessment should be undertaken. This should include predictions of changes in NO₂, PM₁₀ and PM_{2.5} concentrations at relevant receptor locations together with an assessment of impact significance in accordance with Table 6.3 of the EPUK/IAQM guidance.

Finally, whilst the construction dust assessment is accepted, the submitted Site-Wide CEMP Strategy remains a high-level document applicable to the wider development. Prior to commencement of development, a site-specific Construction Environmental Management Plan should be submitted to and approved in writing by Eastleigh Borough Council. The CEMP should include details of construction traffic management, anticipated HGV movements, NRMM controls, dust suppression measures, wheel washing facilities, monitoring arrangements and procedures for managing complaints and incidents throughout the construction phase.