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1. INTRODUCTION

Hydrock prepared the air quality assessment (AQA), ref: WC-HYD-XX-ZZ-RP-Y-2003, for the proposed residential development of 180 units at Land at Woodgate Centre ('the Proposed Development'), planning application ref: AL/107/21/PL. A consultation response has been received as outlined below:

"The Natural England Guidance on the Dunton to Bignor Escarpment SAC confirms that:

This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.

Critical Loads and Levels are recognised thresholds below which such harmful effects on sensitive UK habitats will not occur to a significant level, according to current levels of scientific understanding. There are critical levels of ammonia (NH₃), oxides of nitrogen (NO_x) and sulphur dioxide (SO₂), and critical loads for nutrient nitrogen deposition and acid deposition.

At the present time, the submitted information doesn't provide any evidence or conclusion as to whether these critical loads will be exceeded, as a result of the delivery of c. 180 units. Therefore, both ADC and the Competent Authority and Natural England are unable to conclude that likely significant effects will not result.

Could you formally confirm to me that the development will not result in exceedance of the above mentioned critical levels?"

The below screening assessment has been undertaken to address this response.

2. SCREENING ASSESMENT

It is acknowledged that there are features within the Dunton to Bignor Escarpment Special Area of Conservation ('the SAC') which are considered to be sensitive to changes in air quality. The SAC is approximately 9km from the Site and is located within the administrative boundary of the South Downs National Park Authority.

The Institute of Air Quality Management (IAQM) guidance on the assessment of air quality impacts on designated nature sites¹, and Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations² have been referred to in preparing this note. Both

¹ <https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2020.pdf>

² <http://publications.naturalengland.org.uk/publication/4720542048845824>

guidance documents advocate an initial traffic screening threshold of 1000 AADT to determine the need for further assessment in the context of critical loads / critical levels.

The Proposed Development has been screened against Natural England's multi-step process, whereby:

- Step 1: The Proposed Development will increase AADT within 200m of the A258 Upwaltham which is directly adjacent to the boundary of the SAC;
- Steps 2 and 3: As a worst-case, it has been assumed that sensitive features are within 200m of the A258;
- Step 4a: The transport consultants, Charles & Associates, have distributed the development generated traffic onto the roads closest to the SAC. The proposed development will lead to an increase in traffic of 12 AADT on the A258 Upwaltham, which is well below the 1000 AADT threshold. In accordance with Natural England's guidance, the associated emissions from 12 AADT are not likely to be perceptible and significant.

Additionally, (relevant to Natural England Steps 4b, 4c and 5), a review of the 'South Downs National Park Authority Local Plan 2014-2033 (April 2018) Habitats Regulations Assessment'³ shows that an appropriate assessment of air quality impacts at the SAC has been undertaken as part of the South Down Local Plan process. The HRA concluded at paragraph 5.3.35 *"that no adverse effect upon the SAC will occur from development provided by the Local Plan 'in combination' with growth from other sources."* This accounted for the in-combination effect of road traffic from other plans and projects, including consideration of the Arun Local Plan 2011-2031 Main Modifications (March 2017) which incorporates the Woodgate Centre site as part of the wider BEW allocation.

With regards to construction traffic, the construction traffic management plan, which will form part of the wider construction environmental management plan, will set out details of construction routing ensuring that HGVs avoid using the A258. Therefore, construction traffic will not result in an air quality impact at the SAC.

3. CONCLUSION

On the basis of the above, no further assessment in the context of both Critical Levels and Critical Loads is considered to be necessary. The emissions from 12 AADT associated with the Proposed Development are not likely to be perceptible and significant. Furthermore, it is considered the in-combination effect at the Duncton to Bignor Escarpment SAC has already undergone appropriate assessment at the local plan level.

An Emissions Mitigation Assessment (damage cost calculation) and associated mitigation measures required to reduce the air quality impact from the Proposed Development are detailed in sections 7 and 8 of the submitted AQA.

³ AECOM, 2018, "South Downs National Park Authority Local Plan 2014-2033 (April 2018) Habitats Regulations Assessment", <https://www.southdowns.gov.uk/wp-content/uploads/2018/04/SDLP-05-Habitats-Regulations-Assessment-2018.pdf>