

**From:** Fiona Fitzgerald  
**Sent:** 06 June 2018 12:04  
**To:** Planning.Responses  
**Cc:** Anita Gardner  
**Subject:** FW: CM/6/18 PI land at Northwood Farm

Dear Anita,

Sorry for the delay in responding. Environmental Health does not have any objections in principle to this application. However, I have a few questions, and would like the following conditions to be placed on any permission given:

Questions:

1. With regard to the Acoustic Report from Sharps Redmore dated 23<sup>rd</sup> February 2018 (Project No 1717351) it would appear that the applicant has missed the two closest residential properties to the site which are 1 Meadow Cottage and Paynters Croft (both on Burndell Road). Please could the calculations be re-done to take account of these residential properties?
2. On page 5 of the Planning Statement, paragraph 3.15 states “there are no AQMA’s designated within the district”. Whilst this is correct, I would seek further clarification that this application will not result in Air Quality impacts, or that any impacts will be appropriately mitigated. Given my late response to this application, I would ask that an Air Quality report be submitted and agreed with the LPA in line with the Sussex Air Quality document (attached). I would consider this application a major sized development as the stated application area is stated as being 1.3 ha. Condition requesting this is below.

Conditions:

3. No development shall take place before a report has been submitted to and approved in writing by the Local Planning Authority, which assesses the potential Air Quality impacts from the site and provides mitigation measures if necessary. Thereafter, the use shall not commence until the approved scheme has been fully implemented.
4. No machinery shall be operated, no process shall be carried out and no deliveries shall be taken at or dispatched from the site outside the hours of 0700 – 1800 Monday to Friday, 0800 – 1300 Saturday nor at any time on Sundays and Public Holidays.
5. All vehicles, plant and machinery used on site and those under the applicant’s control moving to and from the site that are required to emit reversing warning noise, shall use white noise alarm as opposed to single tone “bleeping” alarms throughout the operation of the development hereby permitted.
6. External lighting in association with this development shall comply with the Institution of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light GN01:2011, Environmental Zone E2.

Informatives:

1. The granting of this planning permission does not in any way indemnify against statutory nuisance action being taken should substantiated complaints within the remit of the Environmental Protection Act 1990 be received. For further information please contact the Environmental Health Department on 01903 737755.
2. This process will require an authorisation or permit under the Environmental Protection Act 1990, The Environmental Permitting (England and Wales) Regulations 2016, Part B before operations commence and the applicant is advised to contact the Environmental Health Department on 01903 737755.

Regards

Fiona

---

**From:** Anita Gardner  
**Sent:** 05 June 2018 16:51  
**To:** Fiona Fitzgerald  
**Subject:** FW: CM/6/18 PI land at Northwood Farm

Hi Fiona,  
Are you able to advise me of a likely timescale for response? The agent is chasing.  
Thanks  
Anita

---

Anita Gardner | Principal Planner, Directorate of Place, Arun District Council | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF  
Internal: 37529 | External: +44 (0) 1903 737529 | E-mail: [anita.gardner@arun.gov.uk](mailto:anita.gardner@arun.gov.uk)

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**From:** Anita Gardner  
**Sent:** 05 June 2018 16:50  
**To:** 'Alison Crooks'  
**Subject:** RE: CM/6/18 PI land at Northwood Farm

Alison,  
I have chased Fiona today for a response, but have not yet received a reply. I will see if she can confirm a response timescale and get back to you.  
Regards  
Anita

---

Anita Gardner | Principal Planner, Directorate of Place, Arun District Council | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF  
Internal: 37529 | External: +44 (0) 1903 737529 | E-mail: [anita.gardner@arun.gov.uk](mailto:anita.gardner@arun.gov.uk)

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**From:** Alison Crooks  
**Sent:** 05 June 2018 16:31

**To:** Anita Gardner  
**Subject:** RE: CM/6/18 PI land at Northwood Farm

Anita

Can you confirm whether Fiona has committed to provide a response within the next couple of weeks? I need to advise the landowner of timescales.

Many thanks

Alison

**Alison Crooks**

Integrated Skills, Bell House, 32 Bell Street, Romsey SO51 8GW



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**From:** Anita Gardner <[Anita.Gardner@arun.gov.uk](mailto:Anita.Gardner@arun.gov.uk)>

**Sent:** 05 June 2018 14:06

**To:** Alison Crooks



**Subject:** RE: CM/6/18 PI land at Northwood Farm

Thank you

[Anita Gardner](#) | Principal Planner, Directorate of Place, [Arun District Council](#) | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

Internal: 37529 | External: +44 (0) 1903 737529 | E-mail: [anita.gardner@arun.gov.uk](mailto:anita.gardner@arun.gov.uk)

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**From:** Alison Crooks



**Sent:** 05 June 2018 13:54

**To:** Anita Gardner

**Subject:** RE: CM/6/18 PI land at Northwood Farm

Hello Anita

We agree to the extension of time.

Kind regards

**Alison Crooks**

Integrated Skills, Bell House, 32 Bell Street, Romsey SO51 8GW



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---

**From:** Anita Gardner <[Anita.Gardner@arun.gov.uk](mailto:Anita.Gardner@arun.gov.uk)>

**Sent:** 05 June 2018 12:00

**To:** Alison Crooks [REDACTED]

**Subject:** RE: CM/6/18 PI land at Northwood Farm

Hi Alison,

No unfortunately I haven't. I know the officer dealing is Fiona Fitzgerald, but her response is still awaited. Will you please agree to a further extension of time until 15-06-2018.

Thanks

Anita Gardner

---

[Anita Gardner](#) | Principal Planner, Directorate of Place, [Arun District Council](#) | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

Internal: 37529 | External: +44 (0) 1903 737529 | E-mail: [anita.gardner@arun.gov.uk](mailto:anita.gardner@arun.gov.uk)

Visit Arun's web site at [www.arun.gov.uk](http://www.arun.gov.uk)



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**From:** Alison Crooks [REDACTED]

**Sent:** 05 June 2018 11:44

**To:** Anita Gardner

**Subject:** CM/6/18 PI land at Northwood Farm

Hello Anita

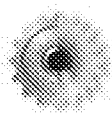
Have you had any response from Environmental Health yet?

Many thanks

Alison

**Alison Crooks**

Integrated Skills, Bell House, 32 Bell Street, Romsey SO51 8GW  
[REDACTED]



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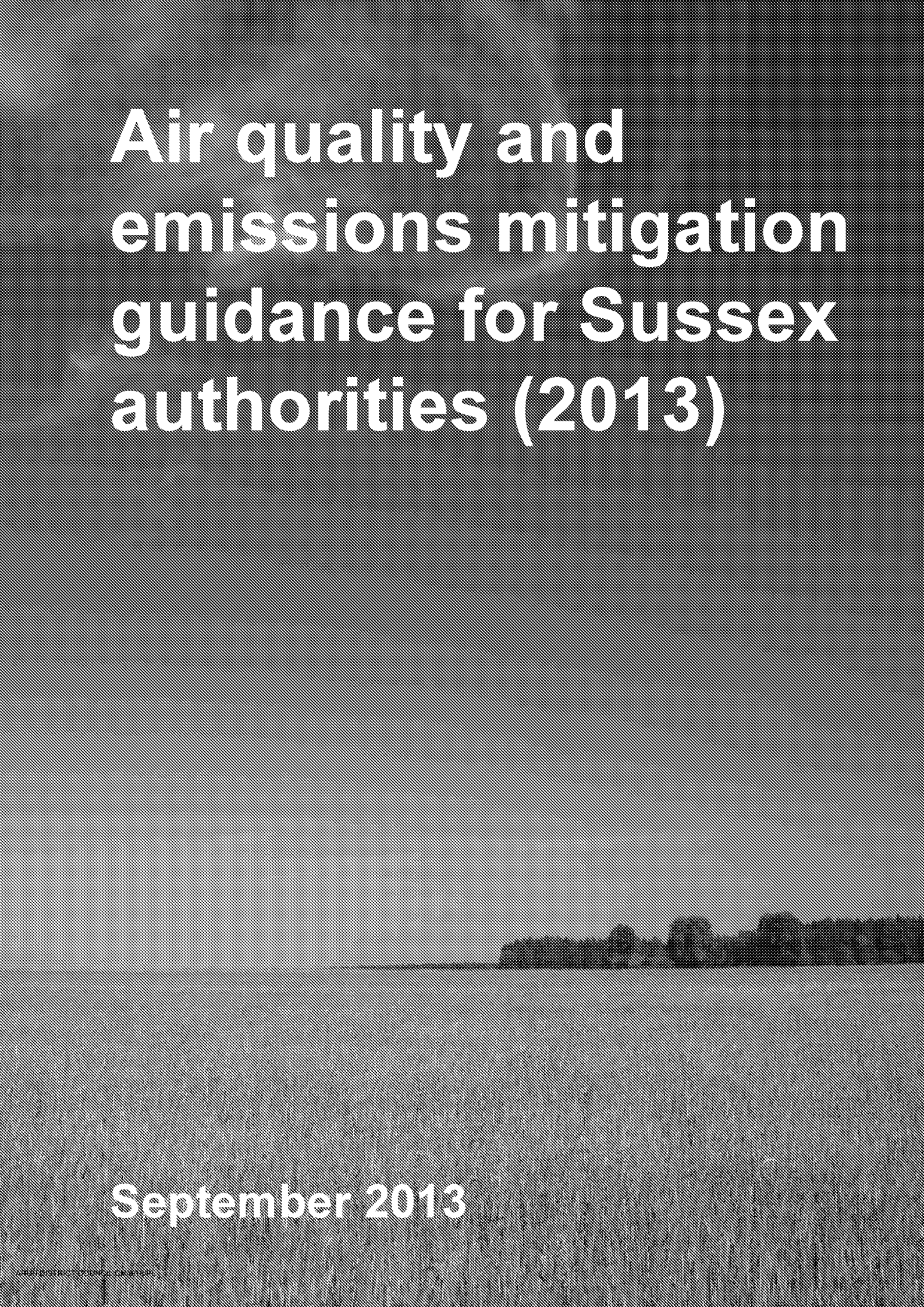
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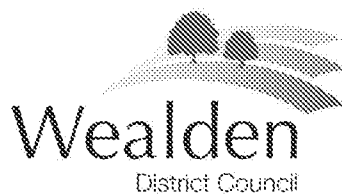
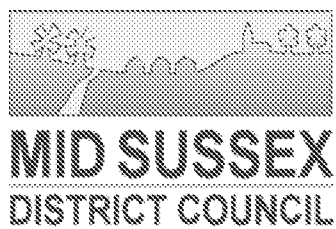
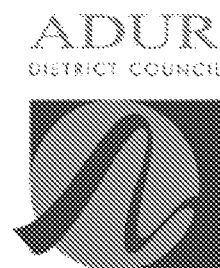
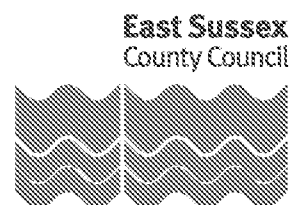
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# **Air quality and emissions mitigation guidance for Sussex authorities (2013)**

**September 2013**



## Air quality and emissions mitigation guidance for Sussex (2013)

The guidance has been developed in response to the changes in national planning policy, through the National Planning Policy Framework (NPPF). This guidance will be regularly reviewed and updated in light of any specific future national and local policy changes, and feedback from users of the document.

The guidance will be available to download from the Sussex Air Quality Partnership website [www.sussex-air.net](http://www.sussex-air.net).

The air quality and emissions mitigation guidance for Sussex (2013) has been developed by members of the Sussex Air Quality Partnership (Sussex-air). The guidance supports the principles of the partnership to improve air quality across Sussex and encourage emissions reductions to improve the environment and health of the population.

The purpose of this guidance is to:

- Provide a Sussex-wide approach for assessing potential air quality impacts from development and transport related emissions and provide a consistent approach to mitigating those impacts.
- Provide technical advice to local planning authorities on how to deal with planning applications that could have an impact on air quality.

## Consultation

The air quality and emissions mitigation guidance for Sussex (2013) will be consulted on between 1st October 2013 and 14th November 2013.

You can view all the documents and download a consultation questionnaire on the Sussex Air Quality Partnership website [www.sussex-air.net](http://www.sussex-air.net).

If you require any further information or feedback on the guidance please contact:

Nigel Jenkins (Sussex Air Quality Partnership)



[www.sussex-air.net](http://www.sussex-air.net)

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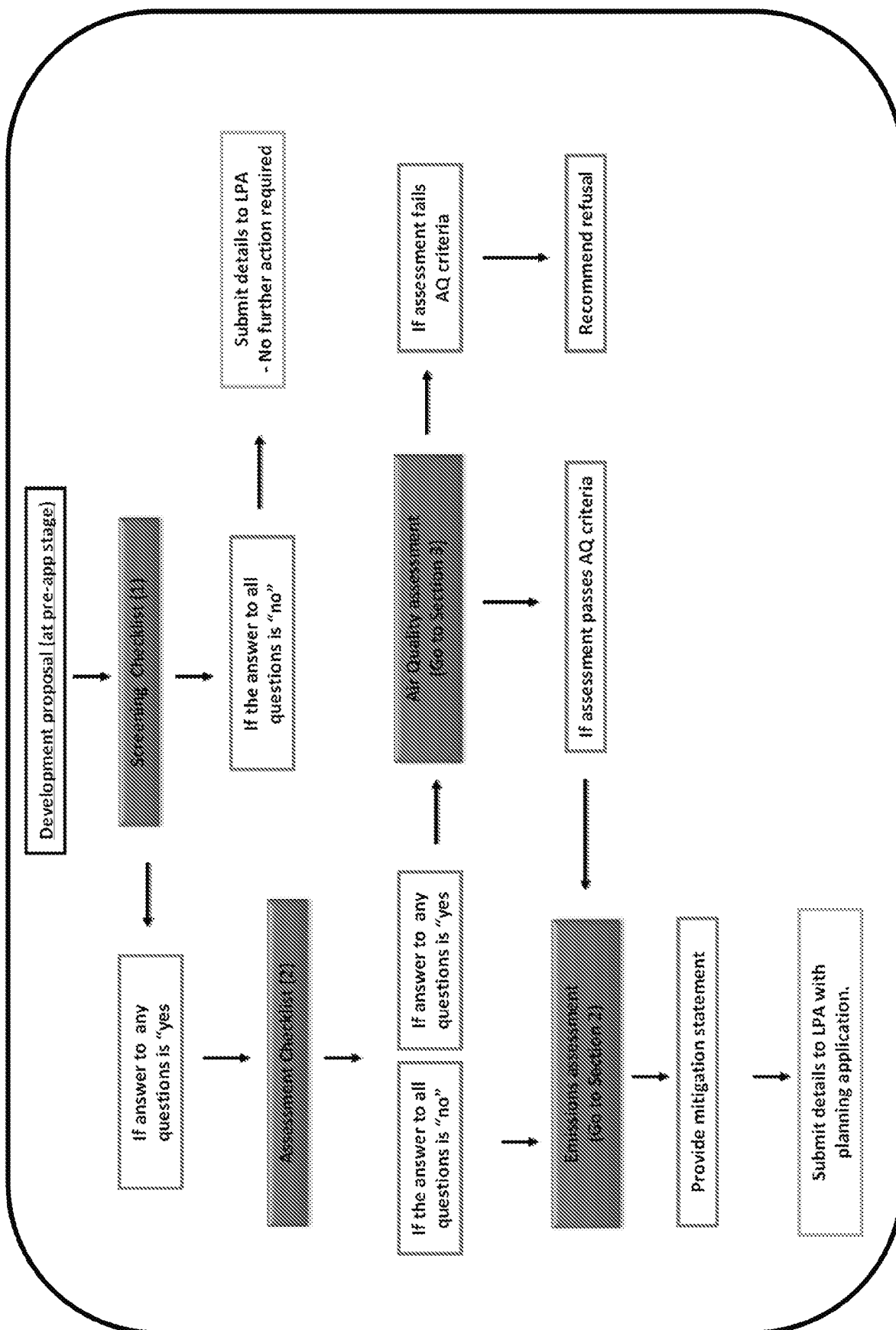
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## **Glossary**

|              |                                                    |
|--------------|----------------------------------------------------|
| <b>AADT</b>  | Annual Average Daily Traffic flow                  |
| <b>AQ</b>    | Air Quality                                        |
| <b>AQAP</b>  | Air Quality Action Plan                            |
| <b>AQMA</b>  | Air Quality Management Area                        |
| <b>AQO</b>   | Air Quality Objectives                             |
| <b>DEFRA</b> | Department for Environment, Food and Rural Affairs |
| <b>DfT</b>   | Department for Transport                           |
| <b>EIA</b>   | Environmental Impact Assessment                    |
| <b>EV</b>    | Electric Vehicle                                   |
| <b>LPA</b>   | Local Planning Authority                           |
| <b>SSSI</b>  | Site of Special Scientific Interest                |
| <b>ULEV</b>  | Ultra Low Emission Vehicle                         |

## Quick reference guide: Air quality and emissions mitigation assessment process



## Introduction

Clean air is essential for life. The quality of the air impacts on human health, the natural environment, other species and can damage buildings and materials. The aim of this document is to provide advice for developers and their consultants on addressing local air quality when making a planning application in Sussex.

Sussex local authorities continue to review the quality of air across the region to identify if there are breaches UK and EU air quality standards. To date this has resulted in the declaration of 12 individual Air Quality Management Areas, across 8 different local authorities in Sussex (2012).

Air quality is a material consideration when a development is planned. The Local Planning Authority will require an air quality assessment where it deems air quality impacts from the development may be detrimental to the environment or people's health.

## National Planning Policy Framework and air quality

In line with the National Planning Policy Framework (NPPF) March 2012, this guidance has been developed to provide a consistent approach to assessing air quality impacts from planned developments. Key paragraphs in the NPPF that relate to developments and air quality include:

### *Paragraph 188*

*"Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties."*

### *Paragraph 120*

*"To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account..."*

### *Paragraph 124*

*"Planning policies should sustain compliance with and contribute towards EU Limit Values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local Air Quality Action Plan."*

## Aims and Objectives

This is a guidance document only, for information on planning policy please refer to relevant local planning policy and the National Planning Policy Framework (2012).

In particular, the document aims to:

1. Enable early engagement, highlighting the points that need to be considered and addressed prior to making a planning application and therefore minimise any potential delays during the decision making process.
2. Offer clear and consistent guidance to developers on the level of information that will be required to be submitted with planning applications for developments that are likely to have an impact on local air quality.
3. Ensure better regulation by setting out the approach to undertaking air quality assessments and determining mitigation, and applying these consistently in planning decisions.

This document will not cover all variables and it is therefore expected that the applicant or their representative will have a pre-application discussion with the Local Planning Authority (LPA) and/ or the local Environmental Health Department. Early engagement with the Local Planning Authority is strongly recommended.

It is intended that the document will be updated from time to time to take account of any new standards/ information/ policy.

This guidance covers all aspects of air quality, with a focus on traffic related emissions; this is because the majority of local air pollution within Sussex is generated from traffic.

## Guidance process

The quick reference guide provides an overview of what information may be required for different types of development.

Section 1: Explains what is required when and why.

Section 2: Sets out how to carry out a mitigation assessment.

Section 3: States what is required in an air quality assessment and how to assess the significance of the effect of a development on local air quality.

Section 4: Sets out planning recommendations for air quality assessments.

## Section 1: What information is required and why

This section provides a more detailed explanation of the steps in the air quality and emissions mitigation assessment process.

### Pre-application stage

Pre-application meetings with the Local Planning Authority should flag up if a development is planned in an Air Quality Management Area (AQMA) or is a major development as stated in Checklist 1.

### Checklist 1: Screening checklist

Checklist 1 is on page 10.

#### **The purpose of Checklist 1:**

To screen out developments which are not likely to have a significant effect on local air quality and, therefore, do not require any further assessments.

**The assessment is quick and simple and can be carried out either by a developer, their agent, or the Local Planning Authority.**

#### **How to use Checklist 1:**

If the answer to **all** questions in the checklist is 'NO', then there is no further action required in relation to air quality. Submit your findings to the local planning authority.

If the answer to **any** question in the checklist is 'YES', then go to Checklist 2.

**If you need any help in completing the checklists, then please contact the Local Planning Authority Air Quality Officer.**

### Checklist 2: Air quality and emissions mitigation assessment checklist

Checklist 2 is on page 10.

#### **The purpose of Checklist 2:**

To determine whether a development requires an air quality assessment and/or an emissions mitigation assessment.

**The checklist should be carried out by a developer's air quality consultant/expert in consultation with the Local Planning Authority Air Quality Officer.**

#### **How to use Checklist 2:**

If the answer to all questions is 'NO' then only an emissions mitigation assessment is required. Please move to Section 3.

If the answer to any question in the checklist is 'YES' then an air quality assessment is required. Please move to Section 2.

## Mitigation assessment

The purpose of an emissions mitigation assessment is to determine the appropriate level of mitigation required from a development, by assessing the emissions from that development.

**The assessment should be carried out by a developer's air quality consultant.**

Guidance on how to carry out an emissions mitigation assessment is given in Section 2, with supporting information provided in the appendices.

## Air quality assessment

The purpose of an air quality assessment is to determine whether the predicted impacts from a development on local air quality will impact on public health and/or the local environment. This section also assesses the significance of the impact of a development on local air quality.

**The assessment should be carried out by a developer's air quality consultant.**

Guidance on how to carry out an air quality assessment is given in Section 3, with supporting information provided in the appendices.

## Planning recommendations

The planning recommendations section provides information on whether a development should be refused on air quality grounds or if granted planning permission, what measures are required from a developer to make the development acceptable on air quality grounds.

Planning recommendations in relation to the effect of a development on air quality is provided in Section 4.

*Note: this section does not set out the specific mitigation requirements; these are provided in Section 2: Emissions mitigation assessment.*

**Checklist 1: Screening checklist**

| Screening checklist (answer all questions with tick ✓)                                                                                                                                    |     |    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|
|                                                                                                                                                                                           | YES | NO |
| 1. Is the proposed development within an Air Quality Management Area (AQMA)*?                                                                                                             |     |    |
| 2. Is the proposed development categorised as a major** sized development?                                                                                                                |     |    |
| <b>Recommendations:</b><br>- If YES, Go to checklist 2.<br>- If both NO, no further assessment required.<br>- If YES, Go to checklist 2.<br>- If both NO, no further assessment required. |     |    |

Note: \*AQMA locations can be located on the Sussex-air website ([www.sussex-air.net](http://www.sussex-air.net)) or the Local Planning Authority's website.

\*\*Major category defined by Town and Country Planning (Development Management Procedure) Order (England) 2010 definitions.

**Checklist 2: Air quality and emissions mitigation assessment requirement checklist**

| Question (answer all questions with tick ✓)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |     |    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | YES | NO |
| 1. Is the proposed development within or in relevant proximity to an Air Quality Management Area (AQMA) or in an area near to exceeding AQ limits (candidate AQMA)?                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |     |    |
| 2. Does the development require an EIA?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |     |    |
| 3. Will development type likely to become large scale major development category size? (either on its' own or as part of several separate (cumulative) planned developments.)                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |    |
| 4. Is vehicle parking in development:<br>>100(outside AQMA) or >50 (within or adjacent to an AQMA)?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |     |    |
| 5. For existing roads with >10,000 Annual Average Daily Traffic (AADT) does the development:<br>Introduce extra vehicle movements (>5%), change avg. vehicle speeds (10kph), is it likely to cause congestion or introduce > 15 heavy duty extra vehicle movements per day?                                                                                                                                                                                                                                                                                                                                                            |     |    |
| 6. Will the development introduce new sensitive receptors:<br>- into or an area in relevant proximity to an AQMA or into a candidate AQMA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |     |    |
| 7. Are there any other proposed developments in the vicinity of this development which could have a cumulative effect on air quality?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |     |    |
| 8. Is the development introducing biomass energy/heating plant into an urban environment?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |     |    |
| 9. Is the development likely to impact on sensitive environments (i.e. SSSI's, National Parks etc)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |     |    |
| <b>Recommendations</b><br>- If yes, contact the Air Quality Officer to confirm that an air quality (AQ) assessment is required.<br>- If yes, an AQ assessment is required.<br>- If yes, an AQ assessment is required.<br>- If yes, contact the Air Quality Officer to confirm that an air quality (AQ) assessment is required.<br>- If yes, contact the Air Quality Officer to confirm that an air quality (AQ) assessment is required.<br>- If yes, contact the Air Quality Officer to confirm that an air quality (AQ) assessment is required.<br>- If yes, an AQ assessment is required.<br>- If yes, an AQ assessment is required. |     |    |
| If all questions are answered = NO,<br>OR the air quality officer determines there is no need for an AQ assessment.<br>= Go to Section 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |     |    |

Note: Contact the LPA air quality officer if there is uncertainty over any questions.

## Section 2: Emissions mitigation assessments

The purpose of an emissions mitigation assessment is to assess the local emissions from a development and to determine the appropriate level of mitigation required to help reduce the potential effect on health and/or the local environment.

### Integrating emissions mitigation into a scheme:

The intention of the guidance is to identify and ensure the integration of appropriate mitigation into a scheme at the earliest stage.

Where mitigation is not integrated into a scheme, the Local Planning Authority may require this through a planning condition(s). If on-site mitigation is not possible then the Local Planning Authority may seek compensation for air quality impacts through a section 106 agreement.

### Calculating the required mitigation for developments

The emissions calculator provides a calculation to determine the amount of pollutant emissions a development is likely to produce. This in turn, by multiplying the damage cost for the key pollutants (PM<sub>10</sub> and NO<sub>x</sub> see below), determines the amount (value) of mitigation that is expected to be spent on measures to mitigate those impacts.

### Mitigation for minor developments:

If the development is not classified as major but is within or in relevant proximity to an AQMA, then it will be at the discretion of the Local Authority Officer responsible for air quality to suggest reasonable mitigation options for these types of development. For other developments use the emissions calculator (below).

### Mitigation for all other developments:

The emissions assessment and mitigation calculator provides a formula to calculate the emissions resulting from a development or change of development use and produces a cost for mitigation measures and/or compensation.

**The assessment should be carried out by a developer's air quality consultant.  
Please contact your local authority officer responsible for air quality for assistance.**

## Emissions calculator

The calculation uses the most current DEFRA Emissions Factor Toolkit to estimate the additional pollutant emissions from a proposed development. (Ref: DEFRA Emissions Factor Toolkit: <http://laqm.defra.gov.uk/review-and-assessment/tools/emissions.html>)

This will provide the relevant pollutant emissions outputs for the mitigation calculation, which is then multiplied to provide an exposure cost value.

This value is used for costing the required emissions mitigation for the development.

*Note: Further detail of the emissions calculator can be found in Appendix 6 (separate document).*

The emissions assessment and corresponding mitigation calculation follows this process:

1. An emissions assessment calculates additional trips generated by the development.
2. The emissions are calculated for pollutants of concern (NO<sub>x</sub> & PM<sub>10</sub>).
3. Using DEFRA IGCB Air Quality Damage Costs for the specific pollutant emissions, the calculation then provides a resultant damage cost calculation.
4. The emissions total is then multiplied x 5, to provide a 5 year exposure cost value.
5. The resulting 5 year exposure cost value, is the value that is to be used to implement mitigation measures within the development. These mitigation measures should be agreed with the Local Planning Authority to ensure that mitigation is in line with local policy and is appropriate for the type, size and location of the development.
6. If some or all mitigation measures cannot be accommodated within the development then mitigation may be provided through compensation via conditions or section 106 contributions. This will be determined by the Local Planning Authority.

## Calculating emissions from alternative fuels and technologies

The emissions calculator (above) provides a basic emission calculation, however if a development proposal is to include alternative fuels or technology i.e. LPG, EV etc, then there are “advanced options” within the EFT to accommodate this. Always check in advance with the air quality officer to agree these options.

## Example emissions calculation

The following example demonstrates the calculation based on a development with 10 domestic properties.

### EFT input:

10 Household (urban not London) (2012) (NO<sub>x</sub> and PM<sub>10</sub>)

X 27 (trip/traffic ratio for 10 houses)

X cars only (0% HGV)

X 50 kph (avg. speed)

X 10km (NTS UK avg.)

**EFT Output** = 32.55 kg/annum (NO<sub>x</sub>) & 3.795 kg/annum (PM)

= 0.0325 tonnes/annum (NO<sub>x</sub>) & 0.003795 tonnes/annum (PM<sub>10</sub>)

X \*£955/tonne (NO<sub>x</sub>) + \*£48,517/tonne (PM<sub>10</sub>)

= £31.08 + £184.15

X 5 (years)

= £155.42 + £920.76

**Total = £1,076**

### Notes:

- Trip rates can be sourced from transport assessment or local authority/transport authority.
- Trip length uses the National Travel Survey(NTS)\*\*\* UK average = 7.1miles/10km
- The IGCB\* damage costs used for Sussex are the IGCB Air Quality Damage Costs per tonne, 2010 prices (Central estimate: NO<sub>x</sub> = £955/tonne and PM<sub>10</sub> Transport Average £48,517).

\* DEFRA IGCB Air Quality Damage Costs (See reference section)

\*\*DEFRA Emissions Factor Toolkit (See reference section)

\*\*\*National Travel Survey (See reference section)

## Requirements for mitigation measures

Scheme mitigation should be provided within the design of the development where possible. Table 1 lists the mitigation options to be considered.

**Table 1. Mitigation options**

- EV recharging infrastructure within the development (wall mounted or free standing in-garage or off-street points).
- Car club provision or support to local car club/eV car club.
- Designation of parking spaces for low emission vehicles.
- Differential parking charges depending on vehicle emissions
- All commercial vehicles should comply with either current or previous European Emission Standard.
- Fleet operations should provide a strategy for considering reduced emissions, low emission fuels and technologies.
- Use of ultra low emission service vehicles.
- Support local walking and cycling initiatives
- On-street EV recharging
- Contribution to low emission vehicle refueling infrastructure
- Low emission bus service provision or waste collection services
- Bike/e-bike hire schemes
- Contribution to renewable fuel and energy generation projects
- Incentives for the take-up of low emission technologies and fuels

The above list is not exhaustive and further options may be suggested where authorities feel it is appropriate, depending on the scale of development and air quality issues within an area.

The mitigation options selected for a development should be relevant and appropriate to:

- Any local policies including Air Quality Action Plans, which may determine the mitigation priorities for a scheme that the local authority may wish to see be incorporated within a particular scheme.
- Any local air quality concerns; to assist in the remediation of potential cumulative air pollution impacts of the development on the local community.
- The type, size and activity of the development.

## Scheme mitigation statement:

Each development requires a brief mitigation statement.

In addition the developer will be required to follow *The Control of Dust and Emissions from Construction and Demolition, Best Practice Guidance*, to minimise dust and other emissions to atmosphere during the construction phase.

### **Scheme mitigation statement:**

The statement must include:

- Development traffic input data for emissions calculation
- Emissions calculation and totals
- Mitigation proposed to be equivalent to the value of emissions calculation (appropriate to the type and size of development and local policy requirements)
- Statement of provisions required to minimise emissions to atmosphere under *The Control of Dust and Emissions from Construction and Demolition, Best Practice Guidance*.

## Section 3: Air quality assessment

The purpose of an air quality assessment is to determine whether the predicted impact of a development on local air quality will adversely affect public health and/or the local environment, both to help determine a planning application and to determine the appropriate level of mitigation from a development. The assessment should be carried out by a developer's air quality consultant.

### Air quality assessment process

This section provides the technical elements and methodology for undertaking air quality assessments for developments. This includes:

- Guidance on air quality assessments
- Significance criteria for determining a developments' impact on air quality.
- Recommendations for planning decisions.

### Air quality assessment

Sussex local authorities have used similar assessment methods to fulfil the requirements of their detailed Review and Assessment that led to the AQMA designations. For consistency, air quality assessments for developments should, where possible, follow similar methodologies.

- Local authorities will work with developers by providing guidance on the suitability of such measures which should be incorporated at the early design stage of any proposal.
- Guidance on the methodologies to be used for air quality assessments is also available in the Department for the Environmental, Food and Rural Affairs (DEFRA) Technical Guidance Note LAQM TG(09).

*Note: Further detail of the air quality assessment requirements can be found in Appendix 7 (separate document).*

#### **Key point:**

Applicants intending to undertake an air quality assessment should always seek the latest information available on local air quality from the local authority.

## Developments that require an Environmental Impact Assessment (EIA)

The Environmental Impact Assessment (EIA) procedure ensures that the likely effects of new development on the environment are fully understood. The EIA is likely to include a detailed study of the effects of any development upon local air quality. The detailed requirements are set-out in Appendix 7

- Developments that require an EIA include major developments which are of more than local importance; developments which are proposed for particularly environmentally sensitive or vulnerable locations and developments with unusually complex and potentially hazardous environmental effects.
- Most proposals for commercial or industrial installations that have the potential to emit pollution (e.g. Part A, A2 and B installations) are likely to require an air quality assessment under the EIA regulations but more detailed "screening" may be required before this can be finally determined.

There are likely to be many other situations where developments that do not require a full EIA will nevertheless warrant an air quality assessment as part of the planning application.

- It is advised that developers, as good practice, should check with the local planning authority to determine whether an air quality assessment is required before submitting a planning application.

### Key point :

Planning applications for major developments may require an EIA, which may need to include a detailed assessment of the likely air quality effects. **The Environmental Impact Assessment Directive** provides the policy requirement for EIA's. As well as the **Habitats Directive** (together with the **Birds Directive**).

## Determining the impact of a development on air quality

The key concern with regard to the air quality impacts of a development is the likely effect on human health. It is important that an air quality assessment evaluates modelled air quality in terms of changes in pollution concentrations where there is relevant public exposure.

- The Air Quality Regulations are concerned with areas that exceed air quality objectives and the revised Air Quality Strategy (2007) considers overall exposure reduction.
- This guidance considers that any development that leads to additional air pollution problems, even if it is outside an AQMA, could be significant.
- The local authority will have to make a balanced judgment on the likely impact of each development, based on the results of the air quality assessment and their professional experience. The local authority may also need to consider the impact of the development on air quality in neighbouring authorities.

## Areas where air quality is a concern

There are key areas where the magnitude of change as well as the concentration of pollutants in air caused by proposed development is a concern.

In some cases any additional contribution of emissions may worsen air quality and cause the creation of a new Air Quality Management Area (AQMA) and therefore a small change in pollutant concentration can be as much a cause for concern as a large one. The areas of concern to consider are:

- **Air Quality Management Areas (AQMAs)**
- **Areas near to or adjacent to AQMAs and candidate AQMAs**
- **Developments that require Environmental Impact Assessments (EIA)**

The process for determining the impacts of a development on air quality are as follows:

**Table 2. Determining significance of the impacts on air quality from a development.**

1. The air quality assessment provides modelled predicted concentrations for scenarios (for agreed year/period): without development (baseline), with development, with development including mitigation measures.
2. A comparison of the scenarios will be presented in the report. Compare scenario "without development (baseline)" with scenario "with development including mitigation measures".
3. The difference in the compared scenarios is used to determine the classification of the change in air quality concentration.
4. The scale of air quality impact due to changes of concentration or if the additional concentration causes local exposure to approach or breach air quality objectives, determines the planning recommendations.
5. Planning recommendations are then provided, as a guide to the development planning authority.

## Scaling of impacts on air quality from a development

An air quality assessment of a development should include modelling results as part of an air quality assessment for a proposal. These shall include modelled output scenarios "with" and "with-out" mitigation proposals as part of the application, to demonstrate predicted health exposure.

- Once the modelled outputs are agreed by the planning officer/air quality officer, then the scale or "magnitude" of change in pollutant concentration can be used to determine the significance of the air quality impact from a development.
- The increase in pollutant concentration is compared to national air quality objective (AQO) levels and pollutant increases are expressed as percentages according to table 3.
- The level of the change or magnitude provides the scale for recommendations for a planning decision (see Table 4, below).

The following table sets the classification of impact to determine their significance.

**Table 3. Classification of impacts due to changes in pollutant concentration.**

| Classification of impact | Concentration change due to development: | Or if development contribution causes: |
|--------------------------|------------------------------------------|----------------------------------------|
| Very High                | Increase > 10%                           | Breach of air quality objective (AQO). |
| High                     | Increase > 5 - 10%                       | Exposure to be within 5% AQO.          |
| Med                      | Increase 1- 5%                           | Exposure to be within 10% AQO.         |
| Low/<br>Imperceptible    | Increase < 1%*                           | -                                      |

*Note: Concentrations are relative to national air quality objective levels (AQO).*

## Section 4: Planning recommendations

If the air quality assessment determines specific changes in air quality due to a single development or from the cumulative effect of several developments; the following recommendations are suggested to the planning authority (see table 4).

- An overriding consideration will be to ensure that the air quality in existing AQMA's does not worsen by the introduction of a development and/or that there is no additional air pollution burden from a development(s) which could create new AQMA's.
- Refusal of a planning application may still be recommended if high to very high air quality impacts from a development remain, even after all reasonable means to mitigate the impacts on air quality have been exhausted.

**Table 4. Planning recommendations.**

| Magnitude of change in air quality | Recommendation                                                                                                                                                                                                                                                      | Action                                               |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| Very High                          | Require mitigation to remove very high air quality impacts. If impact of development on air quality still very high = strong presumption for recommendation for refusal on air quality grounds.                                                                     | Recommend refusal                                    |
| High                               | Recommend refusal unless appropriate on-site mitigation measures implemented to the satisfaction of the planning authority.<br><br>Mitigations to include reducing exposure through various measures, emissions reduction technologies and/or development redesign. | Refusal, unless recommended mitigation is maximised. |
| Medium                             | Seek mitigation to reduce air quality impacts.<br><br>Mitigations to include reducing exposure through various measures, emissions reduction technologies and/or development redesign.                                                                              | Ensure on-site mitigation options are maximised.     |
| Low - imperceptible change.        | Recommend the minimum mitigation for development scheme type.                                                                                                                                                                                                       | Recommend minimum mitigation.                        |

## References

Air Quality Regulations and Air Quality Strategy (2007)  
(Refer to [www.legislation.gov.uk](http://www.legislation.gov.uk))

COMEAP (Committee on the Medical Effects of Air Pollutants)  
[www.comeap.org.uk](http://www.comeap.org.uk)

Construction Code of Practice, Best Practice Guidance, Mayor for London/London Councils <http://www.iaqm.co.uk/guidance.html>

DEFRA Emissions Factor Toolkit  
<http://laqm.defra.gov.uk/review-and-assessment/tools/emissions.html>

DEFRA Interdepartmental Group on Costs and Benefits:  
<http://www.defra.gov.uk/environment/quality/air/air-quality/economic/damage/>

DEFRA Technical Guidance Note LAQM TG(09).  
<http://laqm.defra.gov.uk>

Environmental Audit Committee reports (2010 & 2011)  
(Refer to [www.parliament.uk](http://www.parliament.uk))

Environmental Impact Assessment Directive  
<http://ec.europa.eu/environment/eia/full-legal-text/85337.htm>

EU (European Union) Limit Values  
<http://ec.europa.eu/air/quality/standards.htm>

eV South East Network Partnership  
[www.evsoutheast.net](http://www.evsoutheast.net)

National Planning Policy Framework (NPPF) March 2012  
(Refer to Department for Communities and Local Government (DCLG)) [www.gov.uk](http://www.gov.uk))

National Travel Survey  
<https://www.gov.uk/transport-statistics-notes-and-guidance-national-travel-survey>

Sussex Air Quality Partnership  
[www.sussex-air.net](http://www.sussex-air.net)

Town and Country Planning (Development Management Procedure) (England) Order 2010  
<http://www.legislation.gov.uk/uksi/2010/2184/contents/made>