

## 20/01199/FUL - Elmsleigh Road, Air Quality Comments

EHO Comment	Response
<p>The modelled receptors are all upon the façade of the proposed development with the exception of R1 situated adjacent to the A308. No consideration is given of other planned development facades in the surrounding area or sensitive receptors situated adjacent to roads that the development traffic will utilise beyond a single receptor on the A308. There are many residential properties at height above commercial properties that are closer to the proposed development than R1, and there is a hotel situated to the South. It is not clear why these have been omitted from the assessment. The heights at which the small number of receptors that have been modelled are situated have not been presented.</p>	<p>R1 was identified as the worst case receptor along the A308 due to its proximity to the road and location next to traffic lights. It is therefore expected that the negligible impact at this receptor will also apply to all other existing receptors along the A308. Receptors have been modelled at breathing height (1.5m) for proposed receptors and at first floor breathing height for R1 (4.5m)</p>
<p>The Construction Area Sensitivity analysis on pg 24 notes there are no trackout sensitive properties within 200m of Elmsleigh Rd, to get to Elmsleigh rd construction traffic will need to travel along the A308. Elmsleigh Rd is surrounded by retail properties particularly along the A308, some of which have flats above them. Retail properties are sensitive to resuspended dust from trackout as are the residences above the commercial properties, some of which have balconies. The Community Centre adjacent to the proposed development will be highly sensitive to construction dust impacts as a location frequented by the elderly and vulnerable that has a terrace/balcony area.</p>	<p>As measured from the site exit, there are no highly sensitive properties within 200m of the site. For all other receptors along this distance, with reference to the IAQM guidance, the risk will still be classified as low.</p>
<p>Paragraph 6.3 states that overall the site is considered to be at a low risk of dust impacts and impacts to human health. However Table 5.2 that determines the risk has incorrectly considered that there are no dust sensitive properties within 100m. There are residential properties above the retail outlets along the Highstreet within 100m and the Community Centre within 50m as well as numerous retail and commercial premises with large windows that would be sensitive to dust soiling and trackout. The IAQM Guidance on considers human receptors as <i>'any location where a person or property may experience the adverse effects of airborne dust or dust soiling, or exposure to PM10 over a time period relevant to the air quality</i></p>	<p>As above, the inclusion of these receptors will still result in a low potential risk of dust impacts with reference to the IAQM guidance.</p>

<p><i>objectives, as defined in the Government's technical guidance for Local Air Quality Management. In terms of annoyance effects, this will most commonly relate to dwellings, but may also refer to other premises such as buildings housing cultural heritage collections (e.g. museums and galleries), vehicle showrooms, food manufacturers, electronics manufacturers, amenity areas and horticultural operations'.</i></p>	
<p>The pedestrianised Highstreet and the Memorial Gardens between the A308 and the Thames are amenity areas, the Spelthorne Museum is within 50m of the development site. The site is surrounded by car parking areas that are open to the elements such as Tothill and the Riverside Car Park where residents leave their vehicles to go shopping, The Elmsleigh centre is adjacent as are many other buildings with air intakes, various plant and servicing areas for deliveries of stock that could be sensitive to dust soiling. Therefore a precautionary approach should be taken to assessing dust impacts for the construction phase and adequate mitigation to reduce the impact on the surrounding area must be provided during the construction and demolition process.</p>	<p>Following implementation of the 'highly recommended' measures outlined in the IAQM guidance, the impact of emissions during construction of the proposed development would be negligible. We would also anticipate a Planning Condition requiring a Dust Management Plan/ CEMP.</p>
<p>The assessment should consider at least key receptors within 200m of the roads affected by the development. Traffic data has only been considered for a very narrow area namely the A308 north and south of the Elmsleigh Centre and Elmsleigh Rd. No screening information for traffic has been given (the development screens in following the DMRB on road alignment changes), nor any information to defend this approach of attributing traffic from what is a large town centre development to only two local roads. How are these vehicles going to get to the A308, presumably some will travel through the town from the strategic road network. London Road which is the route into the town centre from the M25 and the A30 has exceedance of the annual mean objective for NO2 in 2019 and it must be considered whether the traffic attributed to this development will worsen that exceedance. The study area for the assessment provided is too small to account for traffic impacts upon</p>	<p>Based on the predicted traffic increases, it is unlikely that the EPUK &amp; IAQM planning guidance screening criteria would be exceeded in other locations following distribution on the wider highway network. It is therefore not considered necessary to assess a wider geographical area.</p>

<p>other receptor locations from the development traffic comprehensively, the Transport Assessment and Travel Plan do not address delivery traffic from shopping and grocery shopping which is likely to travel through the town from the Strategic road network. There appears to be no consideration of cumulative impacts within the assessment in relation to other planned developments, no explanation is given of how cumulative impacts have been considered or not considered.</p>	
<p>There is no explanation of whether there will be any relevant emissions of air pollutants from plant within the development.</p>	<p>Air source heat pumps will be used, therefore no emissions of air pollutants are expected.</p>
<p>The Elmsleigh Centre service ramp running around the western perimeter of the proposed development site has not been considered as an adjacent at height source of emissions in relation to the development residences from the first floor upwards. Residents of the proposed development will be exposed to emissions from this adjacent source of HDV emissions and also from the emissions from adjacent car parks as area sources. These emissions have not been included within the air quality dispersion modelling or accounted for within the Air Quality Assessment.</p>	<p>These sources have been scoped out based on LAQM TG16 guidance.</p>

No information is given on how the traffic assessed is generated nor how cumulative impacts have been taken into account considering other nearby developments mentioned in the TA. There is no explanation of how trips from the car park and /or car club spaces have been considered within the assessment/traffic data for the DS scenario.

To determine the likely trip generation from the proposed development, TRICS version 7.6.3 was interrogated to find comparable sites. The following criteria were used, for privately owned flats and affordable flats:

- Located in England, excluding Greater London
- Weekdays only
- Located in a town centre or edge of town centre
- Surveyed since 01 January 2010

It should be noted that this is likely to be an overestimate of the trip generation, given the low levels of car parking proposed for the site. The privately owned flats selected from TRICS have an average of 1.03 car parking spaces per unit, whilst there is an average of 0.79 spaces per unit for the affordable flats. The assumed trip generation also does not account for the reduction in vehicle movements following the removal of the Masonic Lodge and Telephone Exchange from the site.

		AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			12hr		
		Arrivals	Departures	Two-Way	Arrivals	Departures	Two-Way	Arrivals	Departures	Two-Way
Privately owned flats	Trip rate	0.048	0.153	0.201	0.144	0.082	0.226	0.999	1.023	2.022
	Trips	5	17	23	16	9	25	129	133	262
Affordable flats	Trip rate	0.041	0.068	0.109	0.054	0.075	0.129	0.585	0.537	1.122
	Trips	4	6	10	5	7	12	51	46	97
<b>TOTAL TRIPS</b>		<b>9</b>	<b>24</b>	<b>33</b>	<b>21</b>	<b>16</b>	<b>37</b>	<b>180</b>	<b>179</b>	<b>359</b>

	<p>Trips from the proposed Car Club spaces will be very low, and these have therefore not been explicitly considered in the assessment. Furthermore, a significant proportion of these trips are expected to be associated with residents of the development, and will therefore be included in the figures above.</p> <p>Trips from the existing car park will remain as existing, with no change as a result of the proposed development.</p> <p>No committed developments in the area have been explicitly identified for inclusion in the assessment. However, TEMPro growth factors have been applied to the background traffic flows, which predict that AADT traffic flows will increase by 7.6% between 2020 and 2025.</p>
<p>The Planning Statement mentions the possibility of offsite parking, will this be EV charger enabled? This possibility of further parking offsite has not been assessed within the Air Quality Assessment.</p>	<p>No offsite parking is proposed with the exception of two on-street car club spaces and two on-street loading bays.</p> <p>Whilst some visitor car parking may take place off-site, this will be accommodated within the existing town centre car parks.</p>