Our Ref: J10-14030B-10-1 14 November 2024

For:

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SUBJECT: LAND OFF FREESTONE GROVE, WESTBURY

1 Introduction

Air Quality Consultants (AQC) prepared an air quality assessment in January 2023[1] which was submitted to support the planning application for the construction of up to 40 residential dwellings on land off Freestone Grove in Westbury, Wilstshire. The assessment considered the impacts of the additional traffic generated by the proposed development, including within the Westbury Air Quality Management Area (AQMA) which was declared for exceedances of the annual mean nitrogen dioxide objective in 2001, as well as the suitability of the site for future residents.

The amount of traffic generated by the proposed development fell below screening thresholds set out in industry guidance[2], including within the Westbury AQMA, and therefore a qualitative assessment was presented. This concluded that there would be a negligible impact on local roadside air quality, and that air quality for future residents would be acceptable. The assessment concluded that the air quality effects were 'not significant' and no additional mitigation measures were proposed beyond the best practice and good design measures already incorporated within the scheme.

Based on the draft Air Quality Supplementary Planning Document (SPD)[3] available at the time of the assessment, the development was found to fall within the Type 1 development classification.

2 Public Protection Comments

Comments were received from the Senior Public Protection Officer in September 2023, as follows:

"*The above application has been reviewed by Public Protection from an air quality perspective and I have the following comments. I have emailed you in lieu of uploading to Arcus to enable the applicant to see the attached SPD.*

We note in section 7.2 of the submitted Air Quality Assessment J10/14030A/10/1/F2 dated January 2023, the applicant states that the proposed development falls into the Type 1 classification of Wiltshire Council's draft Air Quality SPD. We disagree with this as the proposed location is in close proximity to an existing AQMA and the A350 and has the potential to exacerbate an existing area of poor air quality. We consider the proposed development should therefore be classed as a Type 3 site and the applicant would need to provide the relevant information as set out within our SPD prior to determination of the application.

We do acknowledge that the SPD is not yet adopted, however the public consultation period has now finished and we are currently working through the responses. We expect that that SPD will fully adopted by full council either later this year or early next year. Depending when this application is due to be determined, these timings may have an impact on whether these additional information is required [sic]."

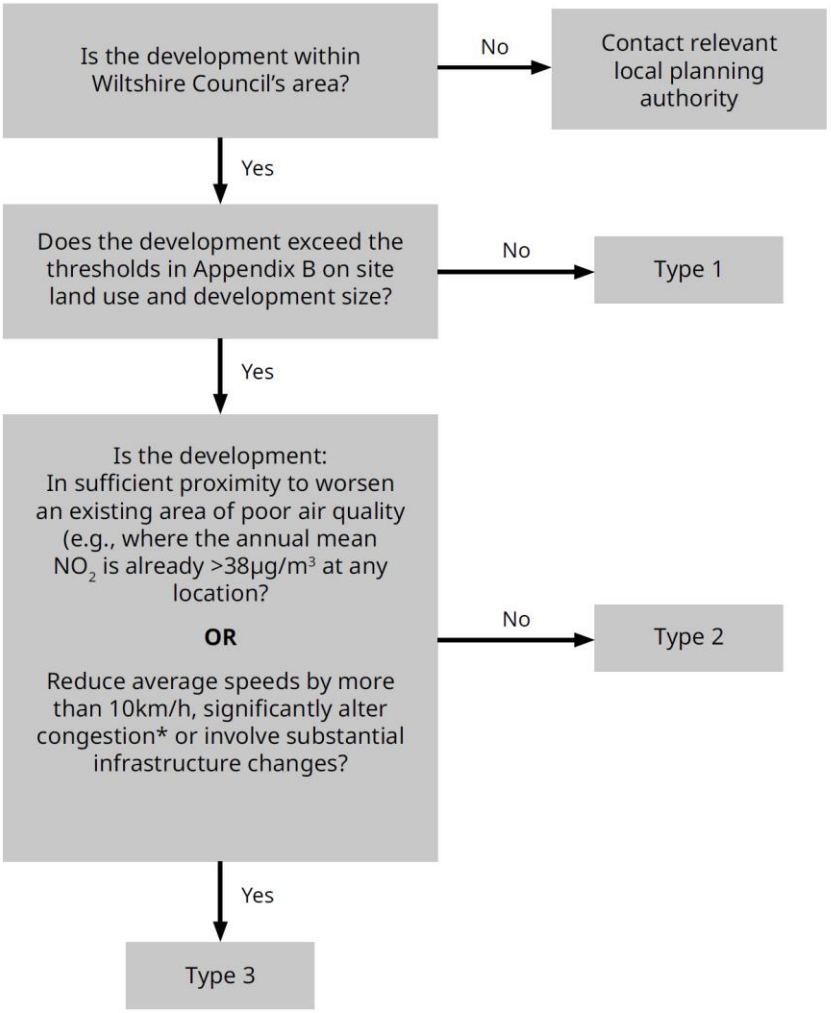
[1] AQC (2023) Air Quality Assessment: Freestone Grove, Wiltshire J10/14030A/10/F2
[2] Moorcroft and Barrowcliffe et al (2017) *Land-Use Planning & Development Control: Planning For Air Quality* v1.2, IAQM, London, Available: http://iaqm.co.uk/guidance/.
[3] Wiltshire Council (2022) Draft Air Quality Supplementary Planning Document (SPD)

A revised version of the SPD, dated July 2023, was provided alongside the comments, and subsequently a request was received for the air quality assessment to be updated accordingly.

3 Air Quality SPD

Page 12 of the SPD sets out the following flowchart:

Flow chart for determining site classification



Appendix B of the SPD sets out the site classification criteria; for use class C3, the threshold is >100 dwellings. Therefore, following the flowchart:

- Is the development within Wiltshire Council's area? **Yes**
- Does the development exceed the thresholds in Appendix B on site land use and development size? **No** (as the proposed development is for up to 40 dwellings).

Therefore, based on the flowchart, the site is classified as Type 1.

4 Local Air Quality Monitoring

The most recent data for four monitoring sites operated by Wiltshire Council within 2 km of the proposed development are presented in Table 1[4]. The data show that there has been an overall reduction in concentrations at all four sites between 2019 and 2023[5], and that in 2023 there were no measured exceedances of the objective, even within the AQMA (monitoring sites 21 and 22).

Table 1: Summary of Annual Mean NO_2 Monitoring (µg/m^3)

Site ID	Site Type	Location	2019	2020	2021	2022	2023
21	Roadside	Haynes Road, Westbury	35.0	29.9	33.3	30.0	25.9
22	Roadside	Warminster Road, Westbury	**42.1**	36.3	**40.4**	36.0	31.6
23	Roadside	23 West End, Westbury	27.9	25.1	26.1	24.9	21.4
24	Suburban	Leighton Park (background), Westbury	9.8	8.3	8.3	8.9	8.5
Objective			**40**				

Whilst the AQMA has historically been an area of poor air quality, conditions have improved considerably, and are expected to continue to improve due to a range of local and national measures, such as the implementation of the local Air Quality Action Plan and more stringent vehicle emissions standards.

5 Summary

Within the AQMA, air quality conditions have improved in recent years, such that there are no longer any measured exceedances of the objective. The proposed development will generate traffic flows which fall below relevant industry screening thresholds; consequently, the additional emissions will have a negligible impact on concentrations within Westbury, including within the AQMA.

The SPD is not yet adopted, although it is anticipated that it will be adopted in early 2025. Notwithstanding, based on the flowchart set out in the SPD, and corresponding threshold criteria set out in Appendix B of the SPD, the judgement set out in the air quality assessment (that the site is classified as Type 1) remains valid.

Issued by:	Dr Denise Evans (Technical Director) [redacted]
Approved by:	Dr Jessica Muirhead (Associate Director)
Date:	14 November 2024

[4] Wiltshire Council (2024) 2024 Air Quality Annual Status Report (ASR)
[5] 2020 results, and to a lesser extent 2021 results, are not considered representative of 'typical' air quality conditions due to the impact of the Covid-19 pandemic on traffic volumes and thus pollutant concentrations.