

8 December 2016
Delivered by email

Caroline Maher
Liverpool City Council
Planning Department
Municipal Buildings, Dale Street
Liverpool
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Dear Ms Maher

**APPLICATION REFERENCE 16F/2049 LAND OFF HARTHILL ROAD: AIR QUALITY AND NOISE
NOVEMBER 2016**

This letter has been prepared by Turley on behalf of Redrow Homes ("Redrow") in response to matters raised by Liverpool City Council (LCC) Local Planning Authority (LPA) during the consultation period on application reference 16F/2049 on land off Harthill Road. In response to LCCs specific request, this letter confirms why an air quality impact assessment and noise assessment are not required to support the planning application (reference 16F/2049).

Paragraph 109 of the National Planning Policy Framework (NPPF) states:

The planning system should contribute to and enhance the natural and local environment by...preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability

The Liverpool adopted Unitary Development Plan states (Policy EP11):

Planning permission will not be granted for development which has the potential to create unacceptable air, water, noise or other pollution or nuisance.

The proposed development is not of a scale, nature, or character to cause an impact on the natural environment, specifically in relation to air quality and noise.

Air Quality

The City of Liverpool is designated as an Air Quality Management Area (AQMA) and LCC use guidance from Environmental Protection UK (EPUK) and the Institute for Air Quality Management (IAQM)¹ to understand when it is reasonable to expect that an air quality assessment will be required. The IAQM Guidance notes that:

¹ EPUK & IAQM Land-Use Planning & Development Control: Planning for Air Quality (May, 2015)

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“an assessment will be required where there is the risk of a significant air quality effect, either from a new development causing an air quality impact or creating exposure to high concentrations of pollutants for new residents.”

The IAQM Guidance provides indicative criteria to guide the need for an assessment but notes that “professional judgement” should be used. An extract of the criteria is provided below:

Table 6.2: Indicative criteria for requiring an air quality assessment

The development will:	Indicative Criteria to Proceed to an Air Quality Assessment ^a
1. Cause a significant change in Light Duty Vehicle (LDV) traffic flows on local roads with relevant receptors. (LDV = cars and small vans <3.5t gross vehicle weight)	A change of LDV flows of: <ul style="list-style-type: none"> - more than 100 AADT within or adjacent to an AQMA - more than 500 AADT elsewhere
2. Cause a significant change in Heavy Duty Vehicle (HDV) flows on local roads with relevant receptors. (HDV = goods vehicles + buses >3.5t gross vehicle weight)	A change of HDV flows of <ul style="list-style-type: none"> - more than 25 AADT within or adjacent to an AQMA - more than 100 AADT elsewhere
3. Realign roads, i.e. changing the proximity of receptors to traffic lanes.	Where the change is 5m or more and the road is within an AQMA
4. Introduce a new junction or remove an existing junction near to relevant receptors.	Applies to junctions that cause traffic to significantly change vehicle accelerate/decelerate, e.g. traffic lights, or roundabouts.
5. Introduce or change a bus station.	Where bus flows will change by: <ul style="list-style-type: none"> - more than 25 AADT within or adjacent to an AQMA - more than 100 AADT elsewhere
6. Have an underground car park with extraction system.	The ventilation extract for the car park will be within 20 m of a relevant receptor Coupled with the car park having more than 100 movements per day (total in and out)
7. Have one or more substantial combustion processes	Where the combustion unit is: <ul style="list-style-type: none"> - any centralised plant using bio fuel - any combustion plant with single or combined thermal input >300kW - a standby emergency generator associated with a centralised energy centre (if likely to be tested/used >18 hours a year)
8. Have a combustion process of any size	Where the pollutants are exhausted from a vent or stack in a location and at a height that may give rise to impacts at receptors through insufficient dispersion. This criterion is intended to address those situations where a new development may be close to other buildings that could be residential and/or which could adversely affect the plume's dispersion by way of their size and/or height.

Source: EPUK & IAQM Land-Use Planning & Development Control: Planning for Air Quality (May, 2015)

The proposed development does not include the realignment of roads, does not introduce a new junction or remove a junction, does not introduce or change a bus station, does not include an underground car park, and does not involve any combustion processes. Accordingly points 3 to 8 of the above criteria are not applicable to the proposed development, and the need for an air quality assessment is not triggered.

The application for the proposal is supported by a Transport Statement (reference Axis, 1768-01-TA01, July 2016), which identifies that the proposed development for residential use would result in the removal of a number of existing HGV movements serving the existing depot site. The delivery of the residential development would therefore likely provide some improvement in local highway network environmental conditions as a result of the removal of the heavy goods traffic from immediate local streets. Accordingly,

point 2 of the above criteria is not applicable to the proposed development, and the need for an air quality assessment is not triggered.

To analyse point 1 of the criteria, Annual Average Daily Traffic (AADT) levels have been reviewed on Harthill Road (Appendix 1). The review shows that the proposed development would only give rise to an increase in traffic over the Harthill Road corridor of less than 5% of the background AADT traffic levels, even including for 'worst-case' traffic estimates (which equates to an increase in 255 average trip rates). IEMA guidelines² suggest that, at a basic level, projected changes in total traffic of less than 10% would create no discernible environmental impact. IEMA guidance further notes that the most discernible environmental impacts of road traffic are considered to be noise and vibration, severance and pedestrian delay and intimidation. Other environmental impacts (e.g. pollution, ecology, etc.) are considered to be less sensitive to general traffic flow changes. IEMA guidelines recommend that as a starting point a 30% change in traffic would represent a reasonable threshold for the need to undertake a more detailed assessment of traffic related environmental conditions.

Based on the above IEMA guidelines, the predicted changes in traffic on Harthill Road in the vicinity of the proposed residential development do not meet the thresholds at which a material change in traffic related environmental conditions could be expected. Due to this an air quality assessment would not be required.

This conclusion follows the results of the Transport Statement, which makes clear that the baseline flow of traffic in the local area (including Harthill Road) is low, and the proposed development will not generate a material detrimental impact on existing traffic levels. As such, baseline air quality issues in the area would be low, and the limited increase in traffic levels would not have an impact on air quality.

However, the IEMA guidance and IAQM guidance set different thresholds for the requirement of undertaking more detailed assessment of traffic related environmental conditions; however both note that professional judgment must be used.

The IAQM guidance makes clear that the above criteria are only indicative, and professional judgements should be used to determine whether an air quality assessment is necessary. The guidance also makes clear that an assessment will only be required where there is the risk of a significant air quality effect. Accordingly, whilst the AADT levels for light duty vehicles are above the threshold provided in the above criteria (point 1), professional judgement has to be used to balance this with the very limited impact the proposed development will have on the existing baseline levels of traffic, combined with the net reduction in heavy goods vehicles, and noting that the proposed development does not meet the other thresholds identified in the IAQM guidance. Accordingly, the proposed development will not have a significant impact on traffic levels or related environmental conditions such as air quality, and accordingly an air quality assessment is not necessary.

During construction of the proposed development, mitigation measures will be implemented to minimise impacts from dust. This can be secured through appropriate planning conditions. Accordingly, there will be no impacts on air quality as a result of the proposal which satisfies paragraph 109 of the NPPF and Policy EP11 of the Liverpool Unitary Development Plan.

Noise

The proposed development is located in an existing urban area and is not of a nature which would cause an increase in noise pollution. In accordance with the findings of the Transport Statement (July 2016)

² Institution of Environmental Management & Assessment (IEMA) document "Guidance for the Environmental Assessment of Road Traffic"

submitted to support the application and the results of the AADT (Appendix 1), the proposed development would not generate a material detrimental impact as a result of traffic on the local highway network. Therefore, there would be no impact on noise sensitive receptors as a result of traffic levels. During construction mitigation measures will be implemented to minimise impacts from construction noise. This can be secured through appropriate planning conditions. Accordingly, there will be no impact on noise sensitive receptors as a result of the proposal which satisfies paragraph 109 of the NPPF and Policy EP11 of the Liverpool adopted local plan.

Accordingly, as the proposal will not have an impact on noise, a noise assessment is not necessary to support the application.

We trust this letter is satisfactory to clarify why an air quality assessment and noise assessment are not necessary to support the proposed application (reference 16F/2049).

Yours sincerely



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Appendix 1: AADT Levels