

Helen Bradshawe
Environmental Health
Knowsley Council

16 January 2023

Dear Helen

Aether's response to the comments provided on the Air Quality Assessment (AQA) for 35 Wilson Road, Huyton, L36 6AE. Planning application number: 22/00284/OUT, 22/02560/PLANNI

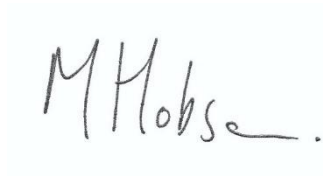
Thank you for providing comments on Aether's air quality assessment report for the proposed development at John Mason International Ltd, 35 Wilson Road, Huyton, Knowsley, L36 6AE. Below is our response to each of your comments.

1. The report details that the local monitoring data was accessed from the latest ASR report, however this is dated 2020. The Council's latest Annual Status Report is ASR 2021 – this was published in December 2021 and approved by DEFRA in February 2022; we also have data available to view for the monitoring year 2021 (ASR 2022). This information was not requested which would have given a more accurate picture of the air quality in the area. This can be provided to update the report. **Apologies for not presenting the latest air quality monitoring results in the Air Quality Assessment report. However, we would not recommend assuming that data for 2020 and 2021 is representative or using it in the dispersion modelling undertaken because of the potential impact of Covid restrictions in these years on traffic flows and hence air pollutant concentrations. Hence, 2019 data has been used to verify the ADMS results.**
2. In table 5.3 of the AQA does the AM peak and PM peak value relate to the peak hourly trips? **Table 5.3 in the Transport Assessment states peak hourly flows and also sets out assumed daily flows.**
3. Table 4 of the AQA indicates that at receptors R1 and R2, in 2024, the annual mean for nitrogen dioxide will be exceeded both with and without the development. Our latest approved ASR, dated 2021, shows that there are no exceedances of the air quality objective for any of the monitored pollutants, although it was close was nitrogen dioxide. We are concerned with the predicted levels and the fact that if the levels go above 40 (R1 significantly), we will need to look at declaring an Air Quality Management Area. In which case we shouldn't be looking to increase the traffic in the area, which a development of the proposed size (bringing 2,860 additional daily trips) would bring. **Estimated annual mean NO₂ concentrations are presented for "no improvement" and "with improvement" scenarios. The former assumes no improvement in the general road transport fleet in the area or background concentrations between the base year (2019) and the first year of use of the development (2024), which is deemed to be a worst-case scenario and not realistic. The latter takes into account expected improvements in the general road transport vehicle fleet in the area**

(as provided in Defra's Emission Factor Toolkit¹) and background concentrations between 2019 and 2024 (as provided in Defra's background maps²). As outlined in the report (page 11 and Appendix C), as a result of recent legal precedent it is now appropriate to use the "with improvement" scenario and to utilise it as a realistic estimate of pollutant concentrations in future years. Therefore, it is the figures that are provided in brackets in Table 4 in the report that should be referred to. Those results show that in 2024 there are no predicted exceedances of the annual mean NO₂ objective at any locations modelled. It is not unreasonable that exceedances of the annual mean NO₂ objective are predicted in the "no improvement" scenario as the results are based on the fact that exceedances were recorded by the diffusion tubes exposed at 1 and 2 Whitefield Lane in 2019 and the years prior to that.

4. In the results section of the AQA it states, *"If improvements in the vehicle fleet are taken into consideration, the annual mean NO₂ concentrations are estimated to be met at all receptor locations modelled."* This implies that if the site improves its vehicle fleet the AQO at each location will be met. How can this be the case if the AQO will be exceeded with or without the development? As discussed above, two scenarios have been modelled. In the "no improvement" scenario, exceedances of the annual mean NO₂ objective are predicted in the without and with development scenario. The "with improvement" scenario, takes into account general vehicle emission improvements in the area and not just those arising from vehicles using the site. Therefore, no specific actions to improve the vehicle fleet using the site are required in order for the "with improvement" scenario to be met.
5. More information is needed on the improvements that will be put in place to ensure the nitrogen dioxide levels are reduced by 2024 as stated. Please see above comments. No further action is required.
6. The TA used in the assessment was based on 2019 data. Are our Highways team satisfied that the figures used accurately reflect the current number of vehicles using the road now, given that a significant development, Beacon 62, is now built? Also, has the assessment taken into account the extra trips that will be associated with Halsnead Garden Village? The Transport Assessment has been discussed with National Highways and the local Highway Authority and the trip generations have been agreed. All committed schemes were such as Beacon 62 and Halsnead Garden Village were included the modelling works. The models included all background growth and committed development such as those referenced above. (Response provided by Mark Ides Associates)

Best regards



Melanie Hobson

¹ <https://laqm.defra.gov.uk/air-quality/air-quality-assessment/emissions-factors-toolkit/>

² <https://laqm.defra.gov.uk/air-quality/air-quality-assessment/background-maps/>