

APPENDIX 3

Summary of AEA Review of Air Quality Impact Assessment for Proposed East Street Development, Farnham

The consultants conclude that:

- The model input data did not include the diurnal variation in traffic flows and variations in weekday and weekend flows. Such considerations give a more realistic representation of the traffic flow.
- No description has been provided on how queuing on the temporary access route may have affected air quality.
- Traffic flows for 2004 and 2012 were provided. It is not clear where these flows originated from.
- In relation to dust emissions during the construction phase it is not clear why RPS have not considered continuous site monitoring, which is recommended for sites deemed to be at high risk.
- The method used to derive the short term concentration for NO₂ is based on an accepted estimation method – basically it is unlikely that air quality hourly standard will be exceeded if the annual mean does not exceed 60µg m⁻³. The current method to estimate the short term exceedance of PM₁₀ is provided in the Defra and Devolved Administrations local air quality technical guidance document (LAQM.TG(09)).
- In addition to the 29 receptors modelled for the original ES another 2 were modelled for the addendum. These appear to be located on Hale Road – presumably to assess the impact close to the hospital but it would be helpful to understand why concentrations were predicted at these additional locations
- The same method as used in the air quality study and reported in Chapter 10 of the ES was used to predict the short-term NO₂ concentrations. However, a more appropriate method was used to predict the short-term PM₁₀ concentration.
- **The Air Quality Assessments prepared by RPS have followed a logical and generally acceptable approach. The findings of these reports suggest that there is a relatively very small or extremely small impact on NO₂ and PM₁₀ during and after the construction phase.**
- **However whilst most of the important modelling inputs to the dispersion model have been presented, other inputs do not seem to have been considered. It is not clear if these omissions were deemed to have an insignificant impact on air quality, or were simply not considered. It is therefore recommended that WBC seek clarification from the applicants' consultants on these issues.**
- In relation to dust, a range of appropriate mitigation measures are outlined in the ES chapter. Using these outlined measures, a proposed emissions checklist has been developed. Whilst it is recognised that the adoption of the outlined mitigation measures should minimise

emissions of dust from the construction site, the best practise guidance identifies that site monitoring constitutes an important way of assisting developers to manage dust and PM₁₀ emissions from construction/demolition sites. **In line with the Best Practise Guidance it is recommended that the implementation of an appropriate PM₁₀ monitoring regime using automatic real time analysers is considered.**