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16th February 2022

Our ref: 22/03341/PLAN
Your ref: W/22/00201/OUT

Dear Emma

**Land At (Os 8894 6544), Kidderminster Road, Hampton Lovett
Outline planning application for the erection of up to 102 dwellings, new vehicular and pedestrian access, and associated works. All matters reserved except for access.**

Air Quality Consultation

Please find below comments made by Worcestershire Regulatory Services for the following document submitted in support of the above application:

- *AQC; Air Quality Assessment: Land at Kidderminster Road, Droitwich Spa; Report ref: J10/12737A/10/1/F2; Dated: 11 January 2022*

The report assesses the air quality impacts associated with a proposed residential development consisting of 102 dwellings on land at Kidderminster Road, Droitwich Spa and in the Air Quality Management Area (AQMA) in Wychbold, approximately 2.6 km east of the proposed development.

ADMS-Roads dispersion model (v5) was used to assess the impacts, model inputs included Emission Factor Toolkit (EFT) (V.11), development traffic flows data was provided by BWB Consulting, meteorological data for 2019 came from the Persnore Monitoring Station and background concentrations were defined using Defra's 2018-based background maps.

Seventeen existing residential properties were identified - E1 to E10 located near to the proposed development and E11 to E17 located within the AQMA in Wychbold. Two additional receptor locations (P1& P2) were identified within the proposed development.

Three scenarios for NO₂, PM₁₀ and PM_{2.5} were used for the assessment:

- base line year 2019;

- the proposed year of first occupation of the proposed development (2024) without the development;
- 2024 with the development.

The modelling showed that the proposed development will have a negligible impact for NO₂, PM₁₀ and PM_{2.5} at existing residential receptors, including those located within the Wychbold AQMA and the air quality effects of the proposed development are deemed to be 'not significant'.

Model Verification was carried out and an adjustment factor of 2.405 was applied to the he modelled road-NO_x concentration for each receptor. A Root Mean Square Error (RMSE) of 3.06% was calculated which is within 10% of the air quality objective.

WRS Comments

The assessment is appropriate and WRS agree with the methodology and conclusions, therefore WRS have no adverse comments to make for air quality. Given the size of the proposed development the following air quality mitigation measures are recommended.

Air Quality

The National Planning Policy Framework (NPPF) Paragraph 181 states: '*Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.*'

It is recommended that the applicant incorporate mitigation measures as part of the development to minimise impact from the development on local areas of poor air quality and assist in alleviating pollution creep arising in the general area. WRS therefore make the following recommendations in accordance with NPPF Paragraphs 102, 103, 105, 110, 170, 180, 181:

Secure Cycle Parking

It is recommended that secure cycle parking facilities are incorporated into the design of commercial developments and domestic plots without sufficient exterior space to allow for secure cycle storage. Full details of the location, type of rack, spacing, numbers, method of installation and access to cycle parking should be provided.

Condition - Secure Cycle Parking

Secure cycle parking facilities should be provided at the development as determined by Worcestershire County Council Design Guidance. Full details of the location, type of rack, spacing, numbers, method of installation and access to cycle parking should be submitted to and approved by the local planning authority prior to the first occupation of the development.

Reason:

NPPF Paragraph 102 and 103 state; '*Transport issues should be considered from the earliest stages of plan-making and development proposals, so that opportunities to promote walking, cycling and public transport use are identified and pursued*' and '*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.*'

Electric Vehicle Charging - Domestic Development

The provision of more sustainable transport modes will help to reduce CO₂, NO_x and particulate emissions from transport. In order to make the properties ready for EV charging point installation, appropriate cable provision and isolation switches must be in place so that future occupiers are able to easily fit the necessary socket for electrical vehicles to be charged in the garage, driveway or allocated car parking space. For developments with unallocated parking i.e. flats/apartments 1 EV charging point per 10 spaces (as a minimum) should be provided by the developer to be operational at commencement of development.

Condition - Electric Vehicle Charging Points for Domestic Properties

Appropriate cabling and an outside electrical socket must be supplied for each property to enable ease of installation of an electric vehicle charging point (houses with dedicated parking). The charging point must comply with BS7671. The socket should comply with BS1363 and must be provided with a locking weatherproof cover if located externally to the building.

For developments with unallocated parking i.e. flats/apartments 1 EV charging point per 10 spaces (as a minimum) should be provided by the developer to be operational at commencement of development. The charging point must comply with BS EN 62196 Mode 3 or 4 charging and BS EN 61851. As a minimum, charge points should comply with Worcestershire County Council Design Guide which requires 7kw charging points for residential developments.

Reason:

NPPF Paragraphs 105 and 110 of the NPPF state; *'If setting local parking standards for residential and non-residential development, policies should take into account the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles'* and *'Applications for development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.'*

Low Emission Boilers

Boiler NO_x emissions from building heating systems contribute to background NO_x concentrations and the following condition is recommended to alleviate impact from new buildings.

Low Emission Boilers Condition

Details shall be submitted to and approved by the local planning authority prior to the first occupation of the development for the installation of Ultra-Low NO_x boilers with maximum NO_x Emissions less than 40 mg/kWh. The details as approved shall be implemented prior to the first occupation of the development and shall thereafter be permanently retained.

Reason:

In the interests of the living conditions of occupiers of nearby properties and future occupiers of the site.

If you have any further queries regarding this matter or information provided in support of the application requiring comment by the Land and Air Quality Team, please do not hesitate to contact us via wrsenquiries@worcsregservices.gov.uk or 01905 822799 quoting the above reference number.

Yours sincerely

Land and Air Quality Team
Technical Services
Worcestershire Regulatory Services