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Sent: Wednesday, November 1, 2023 5:41 PM
To: Leigh Palmer <Leigh.Palmer@lewes-eastbourne.gov.uk>
Cc: Chloe Timm <Chloe.Timm@lewes-eastbourne.gov.uk>; CustomerFirst@lewes-eastbourne.gov.uk; Greenconsultancypractice <Greenconsultancypractice@lewes-eastbourne.gov.uk>
Subject: RE: Site 7 Air Quality (Aldi, Eastbourne) Planning Refs: 220849, 220850 and 220852 - AQ Consultee Response

RSK response letter (444918-04) relating to Air Quality Assessments for 7a Pacific Drive; Aldi Foodstore, McCarthy Stone and LNT Care Developments (1 x 57 units) and (1 x 66 units) Planning Refs: 220849, 220850 and 220852
Recommend approval subject to receipt of AQ damage costs

Hello Leigh,

Further to receipt of RSK's response letter in relation to the above planning application, it is accepted that the air quality impacts are classified as not significant, and the incorporation of additional sensitivity testing would not be likely to alter the conclusions of the assessment, especially as 2019 background concentrations were used in all future modelling scenarios being a conservative assumption. As such, no further dispersion modelling will be required and, *subject to the agreement of a financial contribution/ additional on-site mitigation, in respect of air quality*, there is no further objection to the proposal.

It is understood that trees can influence air quality, improving or worsening air quality depending on species choice, and site location. RSK/ the applicant provides no evidence that this green infrastructure will benefit air quality in any meaningful way and therefore the proposed GI cannot be used to offset the damage cost. The incorporation of trees is also likely required for another discipline and thus, it is certainly not innovative air quality mitigation. Any beneficial impact would likely be imperceptible and would not remove £45,000 equivalence in damage cost, over a 5-year appraisal period. It is also noted the current site has far more green infrastructure on it than is proposed and as such, the beneficial impacts of green infrastructure will likely be less on the proposed site, compared to the existing site. Furthermore, the report includes the cost of landscaping/ preparatory work into the offset for 'green infrastructure', which is not an air quality mitigation measure.

It is noted that a green roof is now proposed, which will act as a surface for pollution deposition. This may have a very small beneficial impact on local air quality (still not likely to be equivalent to £45,000 of damage cost) so a certain percentage of the cost of the green roof may be accounted for as air quality mitigation. It is considered that 5% of the cost of the green roof (£253,810) = £12,690.50 is a reasonable percentage to offset the damage cost being in line with similar approaches adopted by local authorities in London. The applicant can alternatively calculate the NOX and PM2.5 deposition rate onto grassland (a proxy for the green roof) to provide a quantitative estimate of the green roof's benefits to air quality.

In the absence of quantitative evidence supporting the air quality benefits of a green roof on air quality, the fact that the damage cost calculation does not assume any potential slowdown in the renewal of the UK vehicle fleet because of COVID-19, and that the energy strategy has been used to offset the damage cost for transport emissions, it is considered that an air quality financial contribution equalling **£15,772.50** (£28,733 – £12,690.50) should be provided to EBC to offset the potential impact of the proposal and support with off-site measures to improve air quality across the borough.

Kind regards,

Rachel

Rachel Sadler

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