

Application No: 20/501475/FULL: Land To The Rear Of Eden Meadow, Newington ME9 7JH

Proposal: Erection of 20No. residential dwellings and associated car parking, hardstanding, landscaping and open spaces, infrastructure including SuDs and earthworks accessed from the existing junction serving Eden Meadow from the A2 High Street.

Newington Parish Council has commissioned an independent report from the University of Kent Centre for Health Service Studies to examine the air quality reports that form part of each of the four significant planning applications current in the Village and the data available from the air quality monitoring devices in Newington. The report is on the midkent planning portal

In summary this says, of the Eden Meadow report submitted by the applicant:

4.1. Eden Meadow (20/501475/FULL)

4.1.1. Consideration of committed development is incomplete

40. The AQA for Eden Meadow [1] does not include 20/505059/FULL (Willow Trees), 21/504028/FULL (School Lane), or 21/505722/OUT (128 High Street) as part of the proposed development scenario.

41. We understand that the AQA was submitted before these developments existed, but clearly the situation has changed

43. In paragraph 5.5, Lustre cites the LAQM technical guidance [15] (LAQM-TG(16)) as justification as to why their values need adjustment, giving the reason "Since the modeled NO₂ concentrations are outside +/-10%" and then proceed to model adjustment.

44. This misses an important gating procedure that should be applied before moving onto model adjustment

46. The initial model presented by Lustre in Table 12 systematically under-predicts, with an average under-prediction of 12.95 µg/m³.

47. Furthermore, 80% of the 10 sites modeled have percentage errors greater than 25% and the mean percentage error is 33.3%. Clearly then, the majority of results are not within 25%, and thus two of the conditions are not met

48. Thus, it is not appropriate for Lustre to proceed immediately to model adjustment via a simple scaling adjustment factor, they should rather follow the guidance and alter the model inputs until the majority of results are within 25%.

49. Given that the initial model isn't suitable, the final results should not be considered so.

50. In Table 5 on page 24 of Lustre's AQA [1] the modelled verification sites are listed. In paragraph 4.24 that follows the table, we are informed that SW45, SW37, SW38, SW36, and SW78, are not included...

51. The LAQM guidance referred to is correct and is verbatim quoted from paragraph 7.530 on page 7-132 of LAQM-TG(16) [15]. However, there are plenty of properties that front directly onto the road on the A2, and for which the location of these sites makes sense.

52. The exclusion of these sites is quite confusing, since in the AQAs for School Lane [3] and 128 High Street [4], these sites are included in the modelled verification locations. And

APPENDIX 5

yet, all three reports are written by Lustre, and by the same authors. It isn't clear why this discrepancy exists.

In conclusion

93. ... It is not possible to conclude that any of these models are an accurate representation of reality

4. each of them displays varying degrees of flaw in air quality modelling and model uncertainty which needs addressing

5. The predictions computed for each of the AQAs for these developments are inconsistent

7. Proposed mitigation for cumulative impact are simply vague suggestions with not reasoning or rationale provided as to their impact of implementation feasibility

8. Current levels for NO₂, PM_{2.5} and PM₁₀ within Newington exceed WHO guidelines for health.

9. The Newington AQMA has exceed NO₂ objectives in the last reliable year

10. the planning applications should be rejected on the grounds of air quality at this time

This shows the likely damage to the health of Newington residents from the cumulative effect of further housing development in the village.

Please see the independent report from the University of Kent Centre for Health Service Studies which examines the air quality reports that form part of each of the four significant planning applications current in the Village and the data available from the air quality monitoring devices in Newington.

Newington Parish Council requests that this response be forwarded to all members of planning committee as well as the customary summary in the officer report.