

Tunbridge Wells Borough Council

**Planning Position Statement for
proposed developments which may
impact on air quality in Hawkhurst**

June 2020



1.0 Background

- 1.1 Exceedances of the Annual Mean Objective for Nitrogen Dioxide (NO₂) have been identified in Cranbrook Road, Hawkhurst to the north of the crossroads: specifically, close to the traffic lights and going down the hill for approximately 150m.
- 1.2 Tunbridge Wells Borough Council (TWBC) is currently working to declare an Air Quality Management Area (AQMA) in this location.
- 1.3 The implication for air quality is a material consideration when determining planning applications, and in the consideration of allocations in the Local Plan, and in particular is related to changes in traffic movement through a location. It is also important to remember that vehicles' engines are becoming less polluting over time, and there may be changes to private vehicle use and trip generation post 'coronavirus lockdown' as people's places of work and travel preferences change.
- 1.4 Independent consultants are currently undertaking work which will provide information on the impact which changes in traffic movement will have on air quality.
- 1.5 The timetable for the formal declaration of the AQMA involves consultation over summer 2020 before formal declaration in December 2020.
- 1.6 The following sets out the approach which will be taken on planning considerations during this period.

2.0 Planning Applications

- 2.1 As such, certain planning applications for development (please see below) in the parishes of Cranbrook & Sissinghurst, Hawkhurst and Sandhurst will be subject to additional scrutiny to assess their impact on air quality on this section of Cranbrook Road.
- 2.2 This scrutiny will be based on the impact descriptors given in the 'Guidance from the Institute of Air Quality Management and Environmental Protection UK (Land-Use Planning and Development Control: Planning for Air Quality) January 2017' ([view the Guidance](#)).

Thresholds on impact

- 2.3 If a development would produce an increase of less than 100 Light Delivery Vehicles (LDVs – cars and vans of less than 3.5 tonnes gross weight) or 25 Heavy Duty Vehicles (lorries, buses, etc over 3.5 tonnes gross weight) annual average daily traffic (AADT) movements through this section of the Cranbrook Road (approximately 250m to the north of the crossroads) per day, then this can be 'screened out' (see the Guidance at paragraph 2.2).

- 2.4 This means that any proposals for development which is classified as **'Other'** (most commonly household extensions) or applications for Listed Building or Advertisement Consent can be screened out. The only exception to this could be some changes of use of sites/buildings.
- 2.5 Proposals for **'Minor'** development (0 to 9 dwellings, new floor space of less than 1,000 sqm), regardless of their location within the three parishes are unlikely to result in an increase of 100 LDVs or 25 HGVs through this section of Cranbrook Road. Although applicants are advised to discuss this with TWBC Planning through its pre-application advice service and must provide information from transport consultants on the expected impact on AADT movements through this section of the road. However, it is advised that these applicants provide air quality mitigation measures appropriate to the development.
- 2.6 Proposals for **'Major'** development (10 plus dwellings, new floor space of more than 1,000 sqm) within the three parishes may exceed this threshold. Applicants are advised, at any early stage, to establish, through the use of transport consultants, the expected impact on AADT movements through this section of the road.
- 2.7 Any development which is expected to increase AADT by more than 100 LDVs or 25 HDVs should supply a full air quality assessment. The TWBC Validation Advice Note will be updated in due course to stipulate that this is a requirement ([view the Validation Advice Note](#)). TWBC Environmental Protection (EP) will be consulted on relevant Major and Minor applications: EP has advised that it will recommend refusal for any such application until the air quality assessment is supplied.
- 2.8 If an air quality assessment is required, this will need to be undertaken in accordance with IAQM/EPUK guidance and will need to consider the effect of the development on receptors along Cranbrook Road, in the vicinity of Hawkhurst Crossroads, as shown in Figure 1 below.

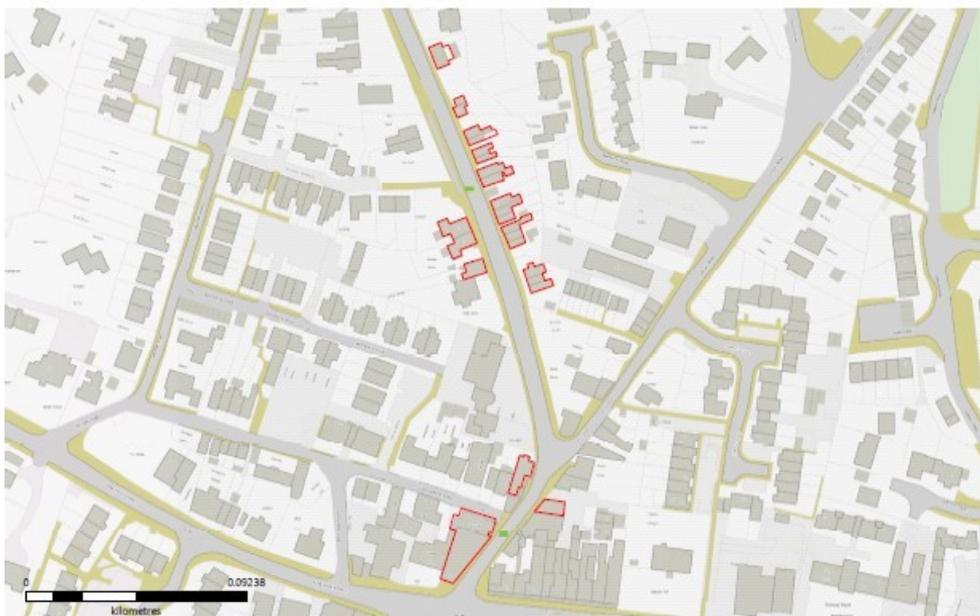


Figure 1: Properties included in the AQMA

2.9 This effect will need to be categorised according to the air quality impact descriptors given in the guidance, as shown in Figure 2 below. The cumulative effect of other nearby developments must be taken into consideration.

Long term average Concentration at receptor in assessment year	% Change in concentration relative to Air Quality Assessment Level (AQAL)			
	1	2-5	6-10	>10
75% or less of AQAL	Negligible	Negligible	Slight	Moderate
76-94% of AQAL	Negligible	Slight	Moderate	Moderate
95-102% of AQAL	Slight	Moderate	Moderate	Substantial
103-109% of AQAL	Moderate	Moderate	Substantial	Substantial
110% or more of AQAL	Moderate	Substantial	Substantial	Substantial

Figure 2: Descriptor categorisation (see the Guidance referred to at paragraph 2.2)

2.10 Each application will be considered on merit, but EP would be likely to recommend refusal for any application having a substantial adverse effect on any property. Any development having a moderate adverse impact on a small number of properties may be approved, providing substantial air quality mitigation is included.

Potential Mitigation Measures:

2.11 This list is not exhaustive but provides some examples of appropriate mitigation, depending on the type of development including Major or Minor.

- Travel plans
- Cycle storage
- Contribution towards active travel infrastructure
- Sustainable public transport provision
- Contribution towards and/or provision of, car clubs, car sharing, cycle share
- Contribution towards membership/travel passes for car club/sustainable public transport and rental/purchase of bicycles
- 50-100% EV charging coverage as additional
- Contributing funding to measures, including those identified in air quality action plans and low emission strategies, designed to offset the impact on air quality arising from the new development.
- Contribution to specific traffic management or road schemes
- Contribution (can be a financial one) to help the authority develop and implement its action plan.

2.12 Applicants are advised to include mitigations measures in their pre-application discussion with the planning authority.

3.0 Local Plan considerations

- 3.1 TWBC consulted on the Draft Local Plan (2016-2036) during September to November 2019. This consultation predated the identification of exceedances of the Annual Mean Objective for Nitrogen Dioxide.
- 3.2 TWBC is currently considering the representations received in response to the consultation.
- 3.3 Further work is being undertaken to assess the individual and cumulative impacts of further allocations in Hawkhurst and Cranbrook & Sandhurst parishes on air quality in these locations, and the results of this work will be taken into account in the preparation of the Pre-Submission Version of the Local Plan. [View the timetable for the preparation of the Local Plan.](#)

EP Response to planning consultation in Hawkhurst – draft flowchart

