

From: Christopher Humphreys <Christopher.Humphreys@highpeak.gov.uk>

Sent: Thursday, July 13, 2023 9:42 AM

To: Steven Gunn-Russell <Stevengr@whitepeakplanning.co.uk>

Subject: RE: HPK/2022/0456 - Dinting Vale - Environmental health

Dear Steven,

At the present time, Environmental Health is unable to consider removing the objection in terms of air quality impacts in relation to the above planning application until further clarification is provided on the following:

An updated [AQ assessment](#) (dated 28 February 2023) has been provided by the applicant

It understood that the DCC HA still have outstanding concerns regarding the transport assessment/ Technical Note. This is fundamental to the AQ assessment and it is therefore difficult to accept a report that is not yet accepted by the HA as a likely reflection of the impact on the Highway.

In addition to the above concern, clarification is sought on the responses given by the applicant below in response to our previous concerns:

- *Request:* Consideration should be given to the effect of the A57 Link Road application which has been approved.
Response: *Included as a sensitivity test and is considered in Section 5.2.2.1*
The author notes “Benefits of the A57 Link Road include reducing congestion between Manchester and Sheffield, which encompasses Dinting Vale road located within the modelled study area, as well as reducing pollution for neighbouring properties. Despite the A57 Link Road reducing congestion in the local area, traffic speeds were kept the same in the sensitivity test scenarios to provide a conservative assessment”.

This is not an accurate statement with regard to Dinting Vale and Glossop. The A57 link road will increase congestion along the A57 in dinting vale, it does not in any way ease this congestion. This was discussed at great length in the inspectors report to the SoS section 5.2.91 in granting the order.
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001752-Final%20Recommendation%20Report.pdf>

This statement appears to have been informed by the amended highways report which notes that they obtained traffic data flows for the A57 dinting vale from National Highways and notes several reductions in traffic flow as a result of the A57. This though does not appear to have been supported with the actual traffic data or a reference (all data should be available via links in the above report).

It is noted that the apparent decrease in traffic is linked to the AQ assessment which suggests that there will be a decrease at several receptor locations (or no change) as a result of the A57 in Glossop.

Please the could the traffic data used in this assessment sensitivity test be clarified and validated.

- *Request:* Inclusion of model input parameters, including clarity regarding traffic speeds (including justification for their use), topography (junction), model receptor locations/ heights/ use of the 'Advanced Street Canyon' module.

Response: Included in Section 3.4.1

It is noted that this report appears to have been completed prior to the publication of the highways technical note which includes information on for example traffic speeds.

Information on speeds was restricted to :

- Traffic speeds were included in the air dispersion model as follows:
 - Small roundabouts and queues were modelled at 5km/h. Due to the known congestion within the study area, a speed of 5km/h was considered most appropriate at replicating the traffic conditions;
 - The 5km/h is agreed but the extent to which these were applied and where they were applied is not clear. The author notes (in explaining the setting up of the base the model) that the discrepancy between the actual data at HP21 (primary school) being higher than the modelled data is in part due to the bus stop and traffic lights meaning interrupted flow/ point sources emissions (...and this is hard to model). This is agreed in part will be interesting to see the speed attributed to this part of the road.
 - There is also no indication that in the do something scenario, any possible changes in flows as a result of the junction to the new development have been considered – if there is no effects it should be noted. Will the change in the bus location affect flows and impact on receptors if moved closer to receptors?
- and,
 - Speed data for free-flowing traffic conditions were obtained from national speed limits

Again the extent of where the free flowing traffic conditions were applied is not clear, it should also be noted that the updated traffic technical note undertook a speed count and noted seven-day average 85th percentile speeds of Northbound 28.7mph and Southbound 25.3mph not 30 mph.

It would be better if this was represented graphically detailing exactly the areas where the differing speeds were applied

- *Request:* Consideration of the impact of the gradient of the access road.

Response: Included in the 'with development' scenarios, as detailed in Section 3.4.1.4.

“The main access road into the Proposed Development includes a single length of road at a gradient of 1:10. This was incorporated into the ‘with development’ scenarios to identify the impact on the adjoining residential properties (modelled existing receptors ER1 and ER2), as requested by the Pollution Specialist Officer. The impact of the gradient on road traffic emissions was calculated using the latest version of the Emission Factor Toolkit (EFT), in accordance with Defra guidance in LAQM.TG (Defra, 2022).

Again it would be better if this was represented graphically detailing exactly the areas where either the gradient was applied (and what gradient was chosen – as agreed by the HA)

- *Request:* Further clarification around the model validation given the difference between actual monitored results and predicted baseline
Response: The modelled receptors included within the comparison were not in the same location as the diffusion tube sites included within the verification process, which is the reason for the discrepancy. The modelled receptor locations have therefore been amended to allow for a like-for-like comparison. A revised comparison between the monitored results and the predicted baseline is included in Section 4.4.1. – *This is generally accepted subject to the comments above*

Kind regards,

Christopher Humphreys
Pollution and Environment Officer
Environmental Heath
Staffordshire Moorlands District Council & High Peak Borough Council