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Newhaven Port Response to Council Comments

Response to East Sussex County Council Consultees' View

'The use of Beach, Clifton and Railway Roads by HGVs to service Phase 1 and 2 is not considered acceptable on amenity grounds'

As highlighted in Table 4.1, Fugitive dust from vehicle movements, trackout and resuspension will be managed by good housekeeping including:

- Combustion powered plant will be fitted with exhausts directed vertically upwards;
- Damping down when necessary of unsurfaced areas over which plant and vehicles are required to travel;
- Speed limit of 10 mph applied to all plant and vehicles operating on the site;
- Routine sweeping and cleaning of paved areas.

Provided these measures are implemented the significance of potential residual dust emissions is expected to be low.

Modelling was also undertaken to assess the impact of traffic-related emissions and the impact descriptors for sensitive receptors on Beach Road and Clifton Road are negligible for NO₂, PM₁₀ and PM_{2.5} at all stages. It should be noted that these impact descriptors are for describing the human-health air quality impacts at sensitive receptors rather than amenity grounds.

Response to Email from Tim Bartlett, Lewes District Council Dated 18th December 2017

Sensitive receptors

On the whole in agreement with location of the sensitive receptors identified, however, I am also aware from investigation of noise complaints that noise can be an issue from port activities at locations further away from the port and further up the surrounding hill sides. This is probably as a result of the local background noise being lower further away from the port - locations such as Hill Crest Road area. While the omission of the Tide Mills area, both in terms of air quality (dust in particular) and noise impact on the beach to the south, appreciating there is permission for deep sea berth, should be reviewed.

The Tide Mills area was not included as a sensitive receptor for dust as it is over 900 m from the site boundary. At this distance from the site the effects of dust are likely to be much lower than other receptors considered.

Air Quality

Scoping of report

- 1) I note there is no mention of the Sussex.air Mitigation Guidance (<http://www.sussex-air.net/PDF/SussexAQGuidanceJan2014.pdf>) – which provides a framework for the assessment of air quality and mitigation potential impacts for proposed developments. Such an approach could then be linked to the Newhaven Air Quality Action Plan. **The classification of impacts due to changes in pollutant concentrations (Table 3) was not mentioned in the report but for the vast majority of receptors the classification of**



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impact would be Low/imperceptible as the concentration change due to development is less than 1% of the objective. At Clifton Road in Stage 1 and 2 the concentration change is 1% and the classification of impact would be Medium. The Business Park and A26 industrial Estate receptors have a concentration change of 1 or 2% but this is as a percentage of the annual-mean objective which does not apply at these receptors. If the change as a percentage of the hourly-mean was calculated, this would be less than 1% and the classification of impact would be Low/imperceptible.

- 2) Paragraph 1.3 Please note that Lewes District Council is responsible for issuing of Part B Environmental Permits rather than East Sussex County Council. **Noted**
- 3) Paragraph 3.8 It is noted that Mr Arnold at East Sussex County Council was consulted on the scope and methodology, however Lewes District Council provide the Environmental Health function. **Noted**
- 4) Table 2.1 makes no reference to Nitrogen dioxide - is this a mistake? **The below objectives for NO₂ should have been included in Table 2.1**

Table 2.1 Summary of Relevant Air Quality Limit Values and Objectives

Pollutant	Averaging Period	Objectives/ Limit Values	Not to be Exceeded More Than	Target Date
Nitrogen Dioxide (NO ₂)	1 hour	200 µg.m ⁻³	18 times per calendar year	-
	Annual	40 µg.m ⁻³	-	-

Sensitive Receptors

Please see above.

Monitoring

- 1) Given that a potential significant adverse impact of this development why was no baseline dust monitoring survey undertaken to provide both the developers and regulators with a baseline in and around the site? Such an assessment would have been in accordance with the NPPG - paragraph 2.23 of report. **The assessment concluded that the effects of dust from the development was not significant so no monitoring was proposed.**

Input data for modelling

- 1) What vehicle emission standards used in the modelling? **Version 7.0 of Defra's Emission Factor Toolkit (EFT) was used in the assessment. The Euro class compositions used in the EFT are in line with the DfT projections. No changes to the default Euro class compositions were made.**

- 2) What commitment will the operators have to ensuring that highest emission standards will be utilised in the road and site operating vehicle fleet? **All road vehicles based on site or operated/commissioned by Brett will conform to European Emissions standards.**
- 3) Meteorological data- it is noted that Herstmonceaux data was used, a location 52m above sea level and 15km from the sea. There is a met station operated by Newhaven Port providing information on wind direction and speed at the harbour mouth, while the data for Shoreham finds a more significant wind contribution from the north. Can the AQ consultants please review the implications of the meteorological data used?

<image001.png>

What is the <image001.png>? Is it the wind rose for the Newhaven Port met station?

The only met data we currently have for Shoreham is between 2003 and 2008. Whilst the data is relatively old, it does show that the prevailing wind is similar to the wind rose at Herstmonceaux in terms of the south-westerly winds. As you have said, the main difference is the contribution from the north. As the nearest sensitive receptors are either north, west or northwest of the Application site, the additional northerly wind is unlikely to change the conclusions of the dust assessment. If anything the impact at these sensitive receptors could be lower.

- 4) Traffic flow data – Table 3.6 – was North and South Ways modelled as a one way system or were traffic flows split? **The base traffic was based on DfT data so considered the one way system. The 2 way generated traffic at the A259 east of the bridge was split between the North and South Ways.**
- 5) With the dust assessment how was the discharging of aggregates and loading onto the conveyor belt handled at this location which is closest to the nearest residential receptors?

Table 4.1 Third row should say ‘Transfer of offloaded sand and gravel directly into dump trucks/conveyor and transported to site’

- 6) Uncertainty and Modelling – what would the impact on dust and air quality be should the rail head not be delivered and or delayed? **We haven’t assessed this so can’t say what the impact will be.**

Impacts and mitigation

- 1) Table 4.1 – there is limited information on dust suppression for stockpiles and loading of materials which can, if not correctly managed, be a large area source of dust. **The aggregate is soaking wet when it arrives and is then put through a wet washing process and is soaking wet when processed. Therefore there is less potential for dust. Dust suppression systems will be installed to cover running surfaces/roads and any other area where there is potential for dust generation.**
- 2) It is noted that the AQ assessment has been handled at each stage, is there a “total” AQ impact assessment and if there is can this be clarified please? **The stage 3 + 4 scenario shows the “total” AQ impact. Please note that as Stage 4 is being withdrawn this is now likely to be an overestimation of the total AQ impact.**

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- 3) With a development such as this a Operational Dust Management Plan would provide information how dust will be managed, mitigated and monitored having regards to present standards and Best Practicable Means. **ok**

Cumulative Impacts

- 1) With a development of this scale at this location an assessment of cumulative impacts on dust and air quality should be undertaken following the advice note 17 found on the Planning Inspectorates website. Has this been undertaken and if so where is it reported? **No a cumulative assessment has not been undertaken.**

Results

- 2) The consultants may wish to review paragraph 7.36 as the AQS objective for nitrogen dioxide as determined at various locations in and around the Newhaven gyratory is exceeded and this paragraph appears to contradict this situation.

Paragraph 7.36 should be:

The results of the modelling indicate that with the development, the predicted PM₁₀ and PM_{2.5} concentrations at existing receptors are below the relevant long and short-term AQS objectives. For NO₂, at a number of receptors the long-term AQS objective is exceeded both with and without the development. When the magnitude of change in annual-mean NO₂, PM₁₀ and PM_{2.5} concentrations is considered in the context of the absolute predictions, the air quality impacts of the development traffic on existing receptors are described as 'negligible'. The development will not lead to an exceedance of the AQS objective where there is one already.

Travel Plan

How does the AQ assessment tie into the Transport Assessment and any associated Travel Plan? **The traffic data modelled in the air quality assessment was provided by the projects' transport consultant. No formal Travel Plan has been prepared for the scheme**

I would have anticipated a Travel Plan to include measures to ensure:

- 1) Vehicles conforming to the European Emission Standards **All road vehicles based on site or operated/commissioned by Brett will conform to European Emissions standards**
- 2) Maintenance Regime for such vehicles **All road vehicles based on site or operated/commissioned by Brett will be maintained in line with manufacturers recommendations**
- 3) Information on ensuring vehicles are sheeted and are not carrying out dust and debris onto the highways system **As a member of the Mineral Products Association Brett fully complies with the MPA policy on vehicle sheeting, as set out in the MPA Charter, and all such vehicles using the site will be sheeted accordingly.**
- 4) Information on haul routes and use of the A26 avoiding the A259 and the Newhaven AQMA and thus reducing risk of congestion **HGV routes for the various stages were**

specifically identified in the TA and paragraph 6.7 summarised these for each stage. For completeness, this paragraph is included below:

“Due to the proximity of the site to the A26 New Road, identified as being the Strategic Road Network local to the site, and the existing environmental weight restrictions to the west at Peacehaven, all HGVs will route to and from the site via the A26 New Road. For Stages 1 and 2, the HGV route will be via Beach Road, Clifton Road, Railway Road, the B2109 Drove Road and the A26 New Road. For Stages 3 and 4, 75% of all vehicular traffic associated with the existing and permitted operations at East Quay is predicted to divert to the New Port Access Road (NPAR). However, 100% of the activity associated with the BAL operations for both Stages 3 and 4 will use the NPAR.”

- 5) Information utilising the excellent public transport system for staff and visitors. The TA identifies that only 50% of the total number of staff for each stage will travel by single occupancy car and as such, the Travel Plan measures to reduce the reliance on the private car for staff has been accounted for in the assessment.