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**Our Ref: KB/JAP10537/MD**  
**Your Ref:**

**E-mail: Kathryn.Barker@rpsgroup.com**  
**Date: 21 June 2018**

Mike Davies  
Davies Planning  
21 The Fairway  
Herne Bay  
Kent  
CT6 7TW

Dear Mike

**Response to Comments - Proposed aggregate importation and processing and the preparation and manufacture of value added products, Fisher's Wharf, East Quay, Newhaven Port**

As requested please see below our response to comments raised in the section 4.1.1 of the Southdown's review of our Air Quality Assessment.

Section 4.1.1 states:

*"The conclusion that Stage 3 and Stage 4 operational impacts will be negligible cannot be supported at this stage. It is therefore recommended that the Applicant provide the following in order to assist in determining whether the conclusion is reasonable:*

- *Further explanation of the traffic flows associated with Stage 3 and Stage 4 of the proposed development and how development-related vehicles are predicted to be distributed on links in the road network (in particular where LDV or HDV flows appear inconsistent on adjoining links);*
- *Inclusion of a greater number of sensitive receptors that may be affected by operational traffic, including New Road on South Heighton and additional receptors along Beach Road/Clifton Road/Railway Road;*
- *Consideration of model performance (including an apparent negative correlation between measured and modelled NO<sub>x</sub>) and uncertainties with respect to Herstmonceaux meteorological data in the conclusion; and*
- *Consideration of shipping emissions associated with the proposed development."*

Each of the points is discussed below.

Point 1 – This has been discussed by the projects transport consultant, Cannon Consulting Engineers in the Appendix.

Point 2 – These roads are lined mainly with industrial units where only the daily and hourly mean objectives apply. The annual-mean objective applies at residential properties. There are two small residential areas along Beach Road/Clifton Road/Railway Road and both have been included as sensitive receptors in the modelling and show a negligible impact. As discussed in



paragraph 3.49 of the Air Quality Assessment, an annual-mean threshold of  $60 \mu\text{g.m}^{-3}$   $\text{NO}_2$  was used as the guideline for considering the likely exceedance of the hourly-mean  $\text{NO}_2$  objective. This approach is consistent with current guidance. As the maximum concentration predicted at modelled receptors along these roads was below the  $60 \mu\text{g.m}^{-3}$  threshold it was not considered necessary to include other industrial receptors as it is unlikely that the predicted concentrations would be much higher than those modelled elsewhere on the road link.

Point 3 – Appendix A outlines the model verification undertaken to compare the modelled and measured  $\text{NO}_x$  concentrations and an adjustment factor of 4.7287 was derived. With this adjustment factor the adjusted modelled  $\text{NO}_2$  was within 25% of or above the monitored  $\text{NO}_2$ , which satisfies current guidance. An adjustment factor of 4.7287 was applied to all modelled concentrations used in the assessment. It is unclear what negative correlation the Southdown review refers to.

The use of Herstmonceaux meteorological data has been discussed in previous correspondence and uncertainty are covered in the report.

Point 4 - 'Shipping' at the port is a permitted operation and permission for its use is not sought.

Yours sincerely  
for RPS



Kathryn Barker  
Air Quality Consultant

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**Note from Cannon Consulting Engineers to address Point 1**

*“We have reviewed the information we submitted for Stage 3 (Stage 4 we accept has now been withdrawn) and I attach an updated Link Flow Diagram that now specifically includes the dedicated link to the NPAR for Stage 3. Below is the table we prepared for Link Flow details for Stage 3 and having reviewed this, the details are consistent, particularly for the HGVs identified. We have also specifically identified LDVs, assumed to be staff movements by car.*

*Proposed Scheme (with Stage 3 development)*

<b>24hr AADT</b>						
<b>Link Identity</b>	<b>Total vehicles</b>	<b>LDV</b>	<b>HDV</b>	<b>%HDV</b>	<b>speed (km/hr)</b>	<b>Speed (m/hr)</b>
1a*	140	31	109	77.8%	32	20
2	0	0	0	0.0%	42	26
3	0	0	0	0.0%	42	26
4	0	0	0	0.0%	48	30
5	0	0	0	0.0%	48	30
6	116	7	109	93.7%	48	30
7	58	4	54	93.7%	64	40
8	67	13	54	0.0%	64	40
9	15	15	0	0.0%	64	40
10	140	31	109	0.0%	48	30
11	140	31	109	0.0%	48	30
12	0	0	0	0.0%	48	30
13	0	0	0	0.0%	48	30
14	0	0	0	0.0%	48	30
15	0	0	0	0.0%	48	30

\* New access road used in Stage 3”