

Wednesday 9th June 2021

Mr Mark East

Hatfield Peverel

Chelmsford

Essex

CM3

The Planning Inspectorate

Temple Quay House

Temple Quay

Bristol

FAO: Inspector Jameson Bridgwater PGDipTP MRTPI and Anne Jordan BA (Hons) MRTPII

Dear Sir/Madam

Statement

Re: Braintree Local Plan – Section 2 – Main Matter 1 Legal Requirements and Overarching Issues relating solely to policies with BLP Section 2.

Whilst the Sustainability Appraisal conducted by LUC on behalf of Braintree District Council addresses Air Quality, its conclusions rely on data that isn't sufficiently researched and/or up to date. The document BDC025/2/2 Sustainability Appraisal Appendices para 1.17 states:

- 1.17 Of the 12 passive diffusion NO₂ monitoring tubes located in the District, three exceeded the annual mean NO₂ objective concentration of 40 g/m³ in 2014. These were sited along the A12 at: Hatfield Peverel, Rivenhall 1 (Hotel A12) and Rivenhall 2 (Foxden A12). The highest recorded concentration was 52.1pgm³ at monitoring location Rivenhall 2. There is no clear trend in data

during the period 2011-2014. Concentrations at some monitoring locations such as Rivenhall 1 and Braintree 5N decrease across the period, while concentrations at Ravenhall 2 have increased since 2012. It should be noted that concentrations are all below the objectives at relevant receptor locations; therefore, Braintree District Council will not proceed to a detailed assessment⁵.

There is no clear and robust evidence that the Local Planning Authority have undertaken sufficient air quality assessments across the District to monitor NO₂, PM_{2.5} and PM₁₀ pollutants.

MHCLG issues guidance notes for planning last updated 1 November 2019 which highlights the impact of poor air quality on human health. This note guides the reader to information available, which includes National Atmospheric Emissions Inventory (NAEI). The data base produces maps identifying zones at risk of high pollutants. It will be observed that a number of these zones are along the A12 corridor. It seems that this data has not adequately been taken into account.

Hatfield Peverel whilst being identified as an area at high risk to poor air quality has not in recent times had any air quality assessments undertaken by the Local Planning Authority.

In conclusion the Sustainability Appraisal and as a consequence the spatial strategy is not sound.

Yours sincerely

Mark East

My Profile

I was a Chartered Insurance Practitioner and qualified Lead Assessor (ISO9001). I held the title of Group Quality Director, Jardine Lloyd Thompson with a small team of International auditors reporting to me. Over a 15-year period our mission was to mitigate the Group exposure to Error & Omission. During my 15 years at the helm more than 20,000 individual audits were conducted.