

## Land Adjacent to Llangennech RFC, Llangennech

25 February 2021

### AIR QUALITY TECHNICAL NOTE – Version 2

Prepared by Kairus Ltd

Haywood Homes Limited proposes to develop the site adjacent to Llangennech Rugby Football Club (RFC) to provide 30 residential units and approximately 60 car parking spaces. The proposed development site is located on land to the south of Pontardulais Road in the village of Llangennech, Carmarthenshire (the 'Site').

The Site is located within the county of Carmarthenshire County Council (CCC). The Council has declared three Air Quality Management Areas (AQMAs) due to exceedances of the annual mean nitrogen dioxide (NO<sub>2</sub>) objective. The Site does not fall within an AQMA, the nearest being the Llanelli AQMA approximately 5.3 km to the west southwest. No exceedances of the air quality objectives have been identified in the immediate vicinity of the Site.

This technical note has been put together following submission of a planning application (PL/00470) to CCC in which Lisa Jones, Environmental Health Practitioner responded setting out the following requirements for air quality:

*The proposed development is not located within or nearby the Llanelli Air Quality Management Area, however the number of properties and associated carpark spaces along with the site's proximity to the nearby SSI Burry Inlet and Longhor Estuary and SAC indicates that it may have potential to result in an adverse impact on air quality as regulated under the Environmental Protection Act 1995 and in relation to the requirements of Local Air Quality Management.*

*Therefore I would request that an Air Quality Assessment performed in accordance with the guidance laid out in the Environmental Protection UK (EPUK), Land-Use Planning & Development Control: Planning for Air Quality (January 2017) document, or a justification document explaining why a detailed assessment is not required.*

*The Air Quality Assessment of justification document must also take into consideration the nearby Special Area of Conservation and SSI that lies less than 200 m to the south east of the proposed development site.*

The proposed development would provide 30 residential units and parking for 60 vehicles. The Design Manual for Roads and Bridges (DMRB)<sup>1</sup> sets out criteria for identifying when road traffic emission impacts on ecological receptors need to be considered. The guidance states that 'a qualitative air quality assessment is required if European Sites are within 200 m of affected roads.' The recently published guidance from the IAQM 'A guide to the assessment of air quality impacts on designated nature conservation sites'<sup>2</sup>, also refers to the DMRB distance criterion to identify where an air quality assessment is required.

According to the Defra MAGIC website<sup>3</sup>, the boundary of the nearby Carmarthen Bay and Estuaries SAC and Bury Inlet and Loughor Estuary SSSI is approximately 215 m from Pontardulais Road. As the

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1 Highways Agency (2019). Design Manual for Roads and Bridges, Sustainability & Environment Appraisal, LA 105 Air Quality

2 Holman et al (2020). A guide to the assessment of air quality impacts on designated nature conservation sites – version 1.1 Institute of Air Quality Management

3 <http://magic.defra.gov.uk/>

affected road is more than 200 m from the designated sites, the impacts on local air quality as a result of traffic emissions are deemed to be negligible.

The DMRB also provide a series of additional traffic screening criteria if the development has not been screened out using the distance criterion. Significant impacts on designated sites are unlikely to occur where a development results in fewer than 1000 vehicles or 200 heavy duty vehicles (HDVs).

The development would provide 30 residential properties on the site. Based on National TRICS data and typical data from elsewhere in suburban South Wales a typical residential development would have a daily trip rate of approximately 4.28 trips per day. For a development of this size this would equate to 128.4 daily trips generated on Pontardulais Road.

This falls well below the DRMB screening criteria of 1000 vehicle per day. Furthermore, this also falls well below the screening criteria set out within the EPUK air quality planning guidance<sup>4</sup> which indicates that where a development generated less than 500 additional vehicles per day in location outside of an AQMA impacts on local air quality are unlikely to be significant and no further assessment is considered necessary.

As the number of vehicles generated by the operational development would fall considerably below both the DRMB and EPUK screening criteria, impacts on the nearby designated sites and other sensitive receptors in the vicinity are unlikely to be significant and can be scoped out for further detailed assessment.

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<sup>4</sup> EPUK and IAQM (2017) Land-Use Planning and Development Control: Planning for Air Quality