

APPENDIX 3

APPENDIX 2

Application: 20/505059/FULL: Willow Trees, 111 High Street, Newington ME9 7JJ
Proposal: Demolition of existing chalet bungalow and erection of 20 dwellings (4 x two bedrooms and 14 x three-bedrooms and 2 x four-bedrooms) with associated access, parking, amenity and landscaping.

These comments are in addition to those previously submitted by Newington Parish Council

Newington Parish Council has commissioned an independent report from the University of Kent Centre for Health Service Studies to examine the air quality reports that form part of each of the four significant planning applications current in the Village and the data available from the air quality monitoring devices in Newington. **The report is on the midkent planning portal**

In summary this says, of the 111 High Street report submitted by the applicant:

4.2.1. No consideration given for committed developments

54. The AQA for Willow Trees [2] appears to consider the proposed development in isolation, and does not consider proposed or committed developments in the area. Therefore future predictions are likely to be under-estimates.

4.2.2. Diffusion tube / Automatic inputs are not all correct and therefore the model is not

56. Some of the values provided for monitored NO₂ do not match up with those provided in Table A.2 starting on page 27 of Swale's 2020 ASR [8]....
58. **Clearly then, the model cannot be correct if its inputs are not.**

4.2.3. Initial model accuracy is poor

63. **This doesn't seem like a very accurate model** and it is our view that the initial model inputs should have been adjusted at this point before proceeding to model adjustment via a scaling factor.

In conclusion

93. ...It is not possible to conclude that any of these models are an accurate representation of reality

4. each of them displays varying degrees of flaw in air quality modelling and model uncertainty which needs addressing

5. The predictions computed for each of the AQAs for these developments are inconsistent

7. Proposed mitigation for cumulative impact are simply vague suggestions with not reasoning or rationale provided as to their impact of implementation feasibility

8. Current levels for NO₂, PM_{2.5} and PM₁₀ within Newington exceed WHO guidelines for health.

9. The Newington AQMA has exceed NO₂ objectives in the last reliable year

10. the planning applications should be rejected on the grounds of air quality at this time

This shows the likely damage to the health of Newington residents from the cumulative effect of further housing development in the village.

Report to Planning Committee – 8 December 2022

DEF ITEM 1

APPENDIX 3

Report to Planning Committee – 10 November 2022

ITEM 2.4

APPENDIX 2

Please see the independent report from the University of Kent Centre for Health Service Studies which examines the air quality reports that form part of each of the four significant planning applications current in the Village and the data available from the air quality monitoring devices in Newington.

Newington Parish Council requests that this response be forwarded to all members of planning committee as well as the customary summary in the officer report.