

I wish to formally **object** to planning application – TP/ED/26/0104

Material Objection: Air Quality Impacts

### 1. Conflict with NPF4 Policy 23 (Health and Wellbeing)

NPF4 requires planning authorities to protect people from harmful air pollution, particularly where developments introduce new sensitive receptors such as children and school staff. The Air Quality Assessment (AQA) does not demonstrate compliance with this requirement because it relies on limited traffic data, omits key streets, and does not assess exposure for all users of the development.

### 2. Reliance on a Single Traffic Survey Day (1 April 2025)

The AQA uses traffic data from a single weekday in April. This is not representative of -

- Term-time school traffic
- Seasonal variation
- Weather-related congestion
- Weekend and evening activity
- Exam periods
- After-school events

A single day cannot capture the real-world traffic patterns associated with a secondary school. This undermines the reliability of the model outputs.

### 3. Underestimation of School-Generated Traffic Emissions

Secondary schools generate intense, short-duration traffic spikes at -

- Morning drop-off
- Afternoon pick-up
- After-school clubs
- Parents' evenings
- Sports events

The AQA assumes -

- No additional congestion
- No queueing
- No idling
- No increase in HDV movements (deliveries, waste, contractors)

These assumptions are unrealistic and materially understate emissions of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>.

### 4. Sensitive Receptors Already Close to Roadside Limits

The AQA acknowledges that receptors include residential properties on Larkfield Road, Woodlands Way, Parkview Court, and two EDC diffusion tube monitoring sites. These receptors are located immediately adjacent to the A806, a busy corridor. Even small increases in NO<sub>2</sub> and PM<sub>2.5</sub> can materially affect health, especially for children, elderly residents, and people with respiratory conditions. The assessment does not consider vulnerable population weighting, which is required under modern public health guidance.

#### 5. Teacher Exposure to Air Pollution (Occupational Health Risk)

The AQA does not assess the exposure of teachers and school staff, who will spend six to ten hours per day on site, five days a week, for decades. This is a material omission because -

- Teachers are long-term daily receptors, unlike pupils who age out of the school.
- Staff car parks, delivery bays, and service areas are typically located near road boundaries, increasing exposure to NO<sub>2</sub> and PM<sub>2.5</sub>.
- Occupational exposure to traffic-related air pollution is linked to asthma, cardiovascular disease, and chronic respiratory conditions.
- NPF4 Policy 23 requires protection of **all** users of a development, not only residents.

By failing to assess teacher exposure, the AQA does not meet the health-led approach required by national policy.

#### 6. Omission of Middlemuir Road and Surrounding Streets

The AQA models traffic emissions only on the A806, Industry Street, Woodilee Road, and a small number of adjacent roads. It does not include Middlemuir Road or the surrounding residential streets, despite the fact that:

- Middlemuir Road and surrounding streets are key access routes for the proposed school.
- It will experience significant increases in traffic from parents, staff, and senior pupils who drive
- They are narrow residential streets with limited pavement width, increasing pedestrian exposure.
- Homes on Middlemuir Road are closer to the carriageway than many of the receptors included in the model.
- The omission means the model does not capture real-world congestion patterns, queueing, or idling emissions that will occur during school peak times.

This omission materially undermines the validity of the assessment because it excludes one of the most affected residential areas.

#### 7. Air Quality Report Validity Warning

The report states that if it is submitted more than 12 months after its date, it should be reviewed to ensure data and guidance remain current. The report is dated January 2026. If the planning process extends beyond January 2027, the assessment becomes invalid and must be redone. This introduces uncertainty and undermines the robustness of the conclusions.

#### 8. Failure to Assess Non-Traffic Emission Sources

The AQA only considers road traffic emissions. It does not assess -

- Construction dust
- Construction vehicle emissions
- Heating plant emissions (CHP/biomass may be added later)
- Increased bus movements
- Increased service and delivery vehicles

The report explicitly states that if CHP or biomass is added later, the assessment must be redone. This means the current assessment is incomplete.

#### 9. No Assessment of Indoor Air Quality for Future Pupils

NPF4 requires planning authorities to consider exposure of new users to pollution. The AQA does not assess -

- Classroom ventilation near the A806
- Playground exposure
- Outdoor sports area exposure
- Cumulative exposure for children spending six to eight hours per day on site

Children are a high-risk group, and the absence of this assessment is a material omission.

#### 10. Cumulative Impacts Not Fully Considered

The AQA includes two committed developments but does not consider -

- Future growth in the Woodilee area
- Increased traffic from new housing allocations
- The cumulative effect of multiple developments on the A806 corridor

NPF4 requires cumulative impacts to be assessed. This has not been done adequately.

#### 11. Model Assumptions Do Not Reflect Real-World Conditions

The ADMS-Roads model assumes -

- Free-flowing traffic

- No cold-start emissions
- No idling
- No congestion at junctions
- No school-related peaks

These assumptions are inconsistent with real-world school traffic and known congestion on the A806. This results in systematic underestimation of pollutant concentrations.

## **Conclusion**

The Air Quality Assessment underpinning the planning application is not robust, not representative, and not compliant with NPF4's health-led approach. It:

- Uses unrepresentative traffic data
- Underestimate of school-related emissions
- Ignores vulnerable populations
- Fails to assess teacher exposure
- Omits Middlemuir Road and surrounding streets
- Contains a built-in validity expiry
- Does not fully assess cumulative impacts
- Relies on assumptions that do not reflect real-world traffic

Given these deficiencies, the planning authority cannot rely on the AQA to conclude that the development will not harm public health. The application should therefore be refused or deferred pending a full, updated, and compliant air-quality assessment.

