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**Report on the Consultation Findings for the  
Local Air Quality Management Review and  
Assessment undertaken by Suffolk Coastal  
District Council**

**June 2002**

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## **Executive Summary**

As part of the requirements of Part IV of the Environment Act 1995, the Government adopted the revised Air Quality Strategy for England, Scotland, Wales and Northern Ireland in January 2000. The strategy continues to represent a comprehensive approach to maintaining and improving the quality of ambient air in the United Kingdom. It sets health-based air quality objectives to be achieved by prescribed target dates, and the process by which the strategy is to be implemented.

The strategy recognises that although national policies on air pollution are expected to deliver a significant improvement in air quality, there is an important local dimension. Local authorities are required by the Environment Act 1995 to carry out periodic reviews of air quality within their areas to assess present and likely future quality against the air quality objectives prescribed in the Air Quality (England) Regulations 2000. All Local Authorities must consult on the findings of the reviews, as laid out in Schedule 11 of the Environment Act 1995.

The Review and Assessment of air quality in the Suffolk Coastal District has been carried out in three stages, in accordance with the guidance provided. There have been three official Consultations, at different stages in this process, to obtain comments on the findings of the review and assessment for the Suffolk Coastal district. This document reports on the findings of these Consultations.

For each Consultation the responses received were collated and divided into three categories; those satisfied and / or had no specific comments to make, those with specific comments that could be dealt with under Local Air Quality Management, and those on topics that could not be dealt with under Local Air Quality Management. A total of 85 responses were received, of which 33 were relevant to Local air Quality Management. Replies received with comments relevant to the scope of Local Air Quality Management have been detailed in this report, together with the Council's response.

All aspects raised in the consultation process, which came within the scope of Local Air Quality Management, have been addressed within the review and assessment process. Work is continuing to be undertaken by Suffolk Coastal District Council to confirm compliance with the Air Quality Objectives in specific areas.

The review and assessment process must be repeated by the end of 2003, and all issues raised by this consultation process will be reassessed, in accordance with the Government guidance published for this purpose.

# 1. Introduction

As part of the requirements of Part IV of the Environment Act 1995, the Government adopted the United Kingdom Air Quality Strategy as a statement of its policies with respect to the assessment and management of air quality. In January 2000, the Government adopted the revised Air Quality Strategy for England, Scotland, Wales and Northern Ireland. The strategy continues to represent a comprehensive approach to maintaining and improving the quality of ambient air in the United Kingdom. It sets health-based air quality objectives to be achieved by prescribed target dates, and the process by which the strategy is to be implemented.

National policies on air pollution are expected to deliver a significant improvement in air quality throughout the country. The strategy recognises, however, that there is an important local dimension to air quality. Local authorities are required by the Environment Act 1995 to carry out periodic reviews of air quality within their areas to assess present and likely future quality against the air quality objectives prescribed in the Air Quality (England) Regulations 2000. These Regulations set objectives for seven pollutants: Benzene, 1,3-Butadiene, Lead, Carbon Monoxide, Nitrogen Dioxide, Sulphur Dioxide and Particulate Matter (PM<sub>10</sub>). All Local Authorities must consult on the findings of the reviews. Schedule 11 of the Environment Act 1995 provides the legal framework for consultation and lists the statutory consultees.

The Review and Assessment of air quality in the Suffolk Coastal District has been carried out in three stages, in accordance with the methodology detailed in the pollutant specific guidance issued by the Department of the Environment, Transport and the Regions (DETR) (now the Department for the Environment, Food and Rural Affairs - DEFRA). There have been three official Consultations at different stages in this process, this document reports on the findings of these Consultations. A list of all consultees can be seen in Appendix A.

The first Consultation was undertaken during July 1998 at the start of the process, before the first stage review and assessment was carried out. The Consultation asked for comments on the proposed review and assessment process and suggestions on identification of any specific areas of concern within the Suffolk Coastal District that should be considered.

The second Consultation was undertaken during May 1999 once the First Stage Review and Assessment Report had been completed, and asked for comments on the findings of the report.

The final Consultation was undertaken during March 2002 once all three review and assessment reports for Suffolk Coastal had been completed and the findings accepted by DEFRA. This final Consultation asked for comments on the findings of all three of the reports.

This document does not comprise a direct transcript of each reply due to the large volume received and the fact that comments were sought without the intention to publish views attributable to individuals. For each round of Consultation, responses received have been categorised as below and the total number in each tabulated. The three categories are as follows;

- ◆ Replies received from consultees who were satisfied with the process / reports and / or had no specific comments to make.
- ◆ Replies received from consultees who had specific comments that could be dealt with under Local Air Quality Management.
- ◆ Replies received from consultees on topics that could not be dealt with under Local Air Quality Management.

Replies received in the second category, i.e. those that are relevant to the scope of the Local Air Quality Management process, have been detailed here for each consultation. The Council’s response to each topic on which replies were received then follows.

## 2. The First Consultation (July 1998)

### 2.1 Results of the first Consultation

The first Consultation was undertaken before the first stage review and assessment commenced. The Consultation asked for comments on the review and assessment process and suggestions on identification of any specific areas of concern within the Suffolk Coastal District that should be considered in the report. A summary table of responses can be seen below, followed by detail for each reply in the second category (those with comments relevant to the scope of the Local Air Quality Management (LAQM) process), and then the Council’s response on each topic covered in these replies.

Summary table of responses received to Consultation undertaken before the first review and assessment commenced (July 1998)

Number of responses received from consultees who were satisfied with the process and/or had no specific comments to make	<b>18</b>
Number of responses received from consultees with specific comments relevant to LAQM (expanded upon below)	<b>21</b>
Number of responses received from consultees on topics which could not be dealt with under LAQM	<b>7</b>
<b>Total number of responses received</b>	<b>46</b>

Further detail for each reply received in the second category (those with comments relevant to the scope of the Local Air Quality Management process),

- ‘Please refer to planning application C98/0747, currently before SCDC Department of Planning and Leisure. This proposal will produce “hot spots” which will require an air management scheme in the following areas:-
  - High road traffic levels, exceeding 25,000 per day through Eyke and Melton
  - Slow moving traffic, particularly at Melton traffic lights which are adjacent to a primary school
  - An “airport whiff” in the area resulting from burning aviation fuel in the atmosphere above an airfield which is “normal practice”. Without more research I’d imagine the latter would be high Benzene levels.’
  
- ‘...on reading the back page of the leaflet and the list of key pollutants, there is no reference to aircraft fuels. One assumes that few airfields are developed that this is an oversight. It is hoped that these are meant to be included and that air quality will be given a high consideration (particularly as it relates to Melton) when the plans for the proposed development of Bentwaters airbase are considered.’

- ‘I believe that the most serious threat to air quality in our district may be caused by the resumption of flying from Bentwaters.  
May I suggest that air quality is measured around Rendlesham and surrounding areas and recorded for future use. In addition it may be sensible to obtain air pollution statistics from other regional airfields so that we can see how our air quality is going to be affected.’
- ‘...With the proposed airport we would like to have the air monitored in Waldringfield.’
- ‘...Traffic – There is concern about this. The tremendous increase must produce air pollution of all the chemicals mentioned, particularly at traffic junctions, roundabouts and especially at peak periods. The area identified in particular is Melton crossroads.  
Aeroplanes – It is understood that pollution inevitably arises from the dropping of unburnt fuel particularly at take-off. This produces deposits, which affects foliage and crops and therefore also has a detrimental effect on animals and humans. The potential area identified is the use of the former RAF Bentwaters for civil aviation and its effect on the immediate villages and Areas of Natural Beauty...’
- ‘We feel that the main pollutants in the area are from road traffic, which is increasing due to increased tourism. There is also air pollution from agricultural sprays.  
If the Bentwaters/Rendlesham Airport proceeds there will be a major increase in air pollution from aircraft flying over an Area of Outstanding Natural Beauty, together with the testing of aircraft engines on the ground. There will also be an increase in traffic pollution from up to 11,500 vehicle movements per day.’
- ‘...Although Yoxford is a rural area, traffic pollution is a considerable problem at major road junctions (e.g Yoxford A12/A1120) during peak hours. Queuing causes a build up of fumes especially in the hot weather; active sampling should take place at regular intervals at these points.  
It has been noticed that “major agricultural processes” have not been mentioned. Spraying does introduce particles into the air (e.g herbicides, pesticides, fertilisers)...’
- ‘Alterations to the A1214 through Kesgrave are at present being implemented and the installation of traffic lights to the two roundabouts at the junctions of Ropes Drive with the A1214 will result in queues in this vicinity. Kesgrave High School, situated between the two roundabouts, will undoubtedly be effected by the increased pollution emitted from queuing vehicles and we would ask therefore for continued monitoring of this area.’
- ‘Kesgrave High School adjoins and lies to the North of the A1214 in the prevailing wind flow. The A1214 is undergoing alterations which, with a new traffic light system, will slow and at times queue traffic past the school. Vehicle fumes are consequently likely to affect the school more than hitherto. Continued monitoring of pollution levels at this site is essential...’
- ‘...The only area locally giving concern is the A12/A14 corridor with the large and ever increasing traffic to and from Felixstowe. No opportunity should be missed to encourage as much of this traffic to use the railway. This would control day to day pollution increases and assist when there are major interruptions with stationary running vehicles, ie Orwell Bridge repairs...’
- ‘...Prevailing winds (South-Westerly) mean that Bucklesham is often effected by traffic fumes from the A12 and A14...’

- ‘Please also take into account the traffic air pollution associated with schools. Particularly High Schools where pupils come by car in addition to parental traffic on the school delivery and pick-up runs. In Felixstowe this applies particularly at Deben High School.’
- ‘While we are aware that there is some small-scale air quality monitoring taking place within Westleton Parish boundaries we would like to see some monitoring in the main village, particularly for traffic pollutants...’
- ‘...Living at Lime Kiln Quay Road in Woodbridge I am able to observe closely the traffic patterns, especially the traffic moving in an easterly direction past my house, and I am extremely concerned at the high level of exhaust emissions from vehicles waiting for the traffic lights. The traffic flow varies during the day but a high level is very noticeable between 16:30 and 18:00 hours each working weekday...Would it be possible in conjunction with Suffolk County Council to conduct a traffic survey during these hours to determine the extent of the problem, and possibly institute some measures to encourage more use of the Woodbridge By-pass by traffic that does not really need to come through Woodbridge Town. In the case of heavy trucks a weight restriction could be placed on through traffic...’
- ‘...Attention should be drawn to the extra traffic using the village of Little Bealings, emitting various fumes and possible pollutants being discharged from Sinks Pit.’
- ‘Our main concern is the increase in road traffic and the threat that this presents to air pollution increase in the future. We would welcome improved public transport and measures to curb the use of cars with only one passenger.’
- ‘...There are a number of local transport related sources within the local authority’s area all of which are generating increasing numbers of HGV traffic...The village of Earl Soham lies in a valley with the A1120 passing through it. A number of houses and the village school with it’s playground are a few feet from the road and there is enormous concern about the emissions from traffic...There is a large increase in the number of houses being built in Framlingham which is a growing town and that will generate an increase in traffic. There is also a business park in Earl Soham which has rapidly increased in size again generating more traffic, all of which turn by the school playground...During the school term a huge number of school coaches pass through the village emitting fumes as they travel between local schools...A very significant source of pollution is being generated by the through traffic using the A1120 as a short cut between the A14 Stowmarket, the A140 and the A12 Yoxford in particular HGV traffic...the air quality and emissions from the vehicles are of extreme concern as the A1120 passes through small villages with houses in close proximity to the road...the status of the road should be reduced to less than an ‘A’ road and this would not only overcome the problem of this totally unsuitable road being used by HGV’s and other traffic as a through route, but the reduction in this traffic would be of great benefit in reducing the emissions and improving the air quality...’
- ‘...The concerns are twofold, pollution in the narrow streets of our small towns by vehicle exhausts, petrol and diesel. We suggest the most effective way to tackle this is to provide free of charge (at point of delivery) car parking outside the town centres whilst supporting minimum polluting public transport. More specifically restrict all centre car parks to 30 minutes free of charge to allow pick up of purchases etc. but those parks that do not involve a through town journey to be free at all times. Particulate pollution; sprays (liquid droplets) and dusts associated with commercial agriculture. Every effort must be made to minimise chemical treatments of all sorts.’



- ‘There is particular concern in the rural agricultural areas regarding crop spraying and particulates caused by farming generally and harvesting in particular. Air quality deterioration due to any airport will be of particular concern...’
- ‘...The area of main concern was one of pollution control concerning the emissions from trains in Westerfield. Parishioners living in the vicinity of the railway line have complained often of the sooty deposit on window sills and elsewhere in their houses, and are concerned with what it contains.’
- Commented that ‘... as Carbon Monoxide and Nitrogen Oxide are the main constituents of diesel exhausts it will be difficult to ascertain if operations at the Port of Felixstowe evolve sufficient emissions to cause problems.’

## **2.2 Response to comments**

### **Emissions from road traffic within Suffolk Coastal**

Concern was expressed regarding emissions from road traffic, both generally and at specific locations, within our district. Road traffic is one of the main emission sources included within the review and assessment process. The guidance provided by the Government allowed us to look at the entire road network within Suffolk Coastal and locate any specific areas of concern to be included in the first stage review and assessment. Traffic flow information was obtained from Suffolk County Council and locations that were highlighted under the guidance at this stage were investigated.

### **Emissions from traffic using the A1152**

At the time of the first stage review and assessment (1998) the traffic flow information obtained for the A1152 did not categorise it as having the potential to cause emission levels which would be of concern within the review and assessment process. At this stage therefore the A1152 was not included in the report. Further information provided on predicted traffic levels for this road following completion of the first stage review and assessment did however result in it's inclusion in the review and assessment process at the second stage (see later).

### **Emissions from the proposed civil aviation airport on the former RAF Bentwaters site, Rendlesham**

There were a number of concerns raised regarding a planning application for a civil aviation airport on the former RAF Bentwaters airfield, and the emissions from aircraft that would result if planning permission were granted for this use. Planning permission for a civil aviation airport on this site was refused and aircraft emissions were therefore not considered within the review and assessment process.

### **Emissions from traffic using the A1214**

The A1214 was considered within the first stage review and assessment for traffic emissions of both nitrogen dioxide and particulate matter (PM<sub>10</sub>) due to the high volume of traffic using the road. The A1214 was then considered in more detail in the second stage review and assessment for both pollutants. The conclusion of the second stage investigation was that there was a negligible risk of the objectives being exceeded for nitrogen dioxide or particulate matter (PM<sub>10</sub>) and no further review and assessment was necessary.

Since this time we have been undertaking continued nitrogen dioxide monitoring along the A1214 and the road will be assessed again, using these measurements and updated traffic flow data, during the next round of review and assessments, to be completed by the end of 2003.

#### **Emissions from traffic using the A12 and A14 trunk roads**

Both the A12 and A14 were considered within the first stage review and assessment for traffic emissions due to the high volume of traffic using both roads. The A12 and A14 were both assessed for nitrogen dioxide and particulate matter (PM<sub>10</sub>), the A14 was additionally assessed for carbon monoxide due to the volume of traffic using it. Due to the high level of traffic using these roads, both were then considered in more detail in the second stage review and assessment for the above pollutants.

#### **Emissions from traffic using the Lime Kiln Quay Road junction in Woodbridge**

Concern was expressed regarding queuing traffic at the junction of Lime Kiln Quay Road / The Thoroughfare and St. John's Street, especially at peak hours. The volume of traffic using this junction was not great enough for it to be considered as a significant source of pollutants within the guidance. The junction was, however, included in the first stage review and assessment due to historic monitoring, undertaken since 1997 at the site, for nitrogen dioxide and benzene. The levels of both pollutants recorded at this junction up to the time of the first stage review and assessment were within the standards set by the Government and, therefore, at this time no further review and assessment was undertaken.

During the time span of the continued review and assessment process, however, recorded levels of nitrogen dioxide at the junction rose to a level at which further review and assessment was necessary and this was undertaken at the third stage in the process. Detailed third stage computer modelling of this junction, by appointed air quality consultants, has now concluded that there is a negligible risk of the objectives being exceeded by 2005 and no further review and assessment is necessary at this time. Monitoring of levels of nitrogen dioxide at this junction continues routinely and air quality at this location will be reassessed in terms of relevant parameters during the next round of review and assessments, to be completed at the end of 2003.

#### **Emissions from traffic using the A1120**

Concern was raised regarding traffic using the A1120, with particular concern about heavy goods vehicles and their contribution to air pollution. The traffic flow data for this road was, however, below the levels set in the Government guidance for production of significant sources of air pollution and this road was therefore not included in the first stage review and assessment. The review and assessment process must be repeated by the end of 2003, and updated traffic flow data will be obtained for this road to reassess it against the levels set in the guidance.

#### **Emissions from the Sinks Pit site in Kesgrave**

Concern was expressed regarding emissions from the Sinks Pit site in Kesgrave. There was one activity on the site at that time, Roadworks (1952) Limited, which was authorised as a Part B process under Part I of The Environment Act 1990. The review and assessment guidance stated that all such processes must be considered. This process was therefore included in the first stage review and assessment and was taken through to the second stage of the process.

During the second stage updated guidance was issued by the Government to include any sites operating quarrying activities in the review and assessment process. The Sinks Pit site was investigated further during the second stage and was taken through to the third stage for further investigation.

Monitoring for emissions of particulate matter (PM<sub>10</sub>) from activities on the Sinks Pit site was undertaken at a relevant receptor location as part of the third stage review and assessment. The levels recorded were within the standards set and it was concluded that further review and assessment of the site was not necessary. The site will be reassessed during the next round of review and assessments, to be completed by the end of 2003.

### **Emissions from agricultural practices**

Concerns were raised in several responses regarding emissions from agricultural practices in the form of particulate matter (PM<sub>10</sub>), from sources such as crop spraying and crop harvesting. The Government guidance on particulate matter (PM<sub>10</sub>) recognised that many sources would be beyond the control of the local authority, and no provision was made for emissions from agriculture to be assessed. As a result of the Government guidance emissions from agricultural practices were unable to be investigated within the remit of Local Air Quality Management.

### **Emissions from trains**

Concern was raised regarding emissions from trains using the railway line at Westerfield. The Government guidance used for the review and assessment process states that emissions from railways will only be associated with diesel engines and are too low to have any significant impact alongside railway tracks. There is only the potential for any impact where there are stationary idling engines at a major depot or terminus with sensitive properties nearby. Emissions from trains using the railway line at Westerfield were therefore not included in the first stage review and assessment.

### **Emissions from operations at the Port of Felixstowe**

The Port of Felixstowe has a number of operations that were considered within the first stage review and assessment process. All processes (Part A and B) authorised under Part I of the Environmental Protection Act 1990 on the Port of Felixstowe site were investigated. All businesses with over 50 employees on the site were surveyed to assess the type of heating fuel used and any associated sulphur dioxide emissions. Emissions of sulphur dioxide and particulate matter (PM<sub>10</sub>) from shipping activities were also investigated.

From all the potential emission sources investigated, only emissions of sulphur dioxide and particulate matter (PM<sub>10</sub>) from shipping activities were taken through for further investigation in the second and third stage review and assessments.

## **3. The Second Consultation (May 1999)**

### **3.1 Results of the second Consultation**

The second Consultation was undertaken once the First Stage Review and Assessment Report had been completed. The Consultation asked for comments on the findings of the report. A summary table of responses can be seen overleaf, followed by detail for each reply in the second category (those with comments relevant to the scope of the Local Air Quality Management process), and then the Council's response on each topic covered in these replies.

Summary table of responses received to Consultation undertaken on the First Stage Review and Assessment Report (May 1999)

Number of responses received from consultees who were satisfied with the process and/or had no specific comments to make	<b>8</b>
Number of responses received from consultees with specific comments relevant to LAQM (expanded upon below)	<b>8</b>
Number of responses received from consultees on topics which could not be dealt with under LAQM	<b>4</b>
<b>Total number of responses received</b>	<b>20</b>

Further detail for each reply received in the second category (those with comments relevant to the scope of the Local Air Quality Management process;

- ‘...I compliment you on the thoroughness of the first stage report. I understand that the need for a second stage review is removed for NOx if “projected AADT is less than 20,000 vehicles” page 23, Melton crossroads has therefore been excluded. However, the imminent AADT for Melton crossroads is 24,000 from SCDC figures arising from the traffic impact assessment for the MoD permission for Bentwaters (C96/1422). Since developers are now starting to implement this permission, this traffic level will be reached well before the next round of reviews. Because projected levels should be considered, a second stage review should be set up for NOx for Melton crossroads...’
- ‘Melton crossroads in the centre of the village next to a primary school already has an overload of vehicles and this number has reached saturation point as already identified by the MoD Traffic Impact Assessment for SCDC. The number of 24,000 vehicles per day is excluding recent development at RAF Woodbridge and does not account for the proposed airport at Bentwaters or development at the Sutton Hoo scheme, added to this we will have over head pollutants from aeroplanes using the route directly over Melton. Added to this if the traffic grinds to a standstill these pollutants will blow directly towards the school on all three sides.’
- ‘The air quality in the vicinity of Melton Primary School at Melton crossroads is of continuing and increasing concern. There is the potential danger to school children of higher levels of hazardous substances in the air as a result of increased traffic (slow moving and stationary) at the crossroads due to the Bentwaters development (as of now and also in the future), visitors to Sutton Hoo site, and the new St. Audreys development (some 200 dwellings). We would accordingly welcome detailed investigation and monitoring of this particular site. The position would become even more severe should any kind of aviation be allowed at Bentwaters as Melton is on the main flight-path to/from the airfield.’
- ‘...monitoring emissions from the A14 close to the residential properties in Faulkeners Way, Fen Meadow, The Langstons etc. in Trimley St. Mary should be maintained and if possible increased.’
- ‘...We would welcome assessment on summer weekends on the A12 and A1120 at Yoxford, when holiday traffic is particularly heavy and causes air pollution, considered to increase the already high level of pollution in the area.’

- ‘...has concerns regarding traffic emissions effecting the A12 at Farnham and requests that we undertake pollution monitoring along this stretch of the A12...’
- ‘Please would you consider doing a detailed study of the Red House Farm area of Bucklesham, in order that the effects of the proposed quarry can be monitored.’
- ‘...I have reviewed the contents of your Stage 1 report and have no additional findings to add as regards processes operating under Part 1 of EPA 90. You may wish, however, to extend your investigations into fugitive releases of particulate matter referred to in paragraph 3.7.8 to include those from licensed waste disposal facilities including lorry movements on unmade roads, from harvesting operations, and from ship out-loading of grain....’

## **3.2 Response to comments**

### **Emissions from traffic using the junction of the A1152 and B1438 at Melton (Melton crossroads)**

Following further information provided on predicted traffic levels for the A1152, in particular the junction with the B1438 at Melton crossroads, second stage review and assessment was undertaken for nitrogen dioxide and particulate matter (PM<sub>10</sub>) emissions from traffic using this road.

The conclusion of the second stage review and assessment was that a third stage assessment would be necessary to investigate nitrogen dioxide levels for the Melton crossroads only (see later). For the other sections of the A1152 and particulate matter (PM<sub>10</sub>) emissions, the risk of the objectives being exceeded was negligible and no further review and assessment was necessary.

### **Emissions from the proposed civil aviation airport on the former RAF Bentwaters site, Rendlesham**

Concerns were again raised regarding a planning application for a civil aviation airport on the former RAF Bentwaters airfield, and the emissions from aircraft that would result if planning permission were granted for this use. Planning permission for a civil aviation airport on this site was refused and aircraft emissions were, therefore, not considered within the review and assessment process.

### **Emissions from traffic using the A14**

Concern was expressed regarding emissions from traffic using the A14, in particular at receptor locations close to the roadside in Trimley St. Mary. Review and assessment of emissions from traffic using the A14 was continued with a second stage report. The conclusions of the second stage were that for carbon monoxide and particulate matter (PM<sub>10</sub>), the risk of the objectives being exceeded was negligible and no further review and assessment was necessary. For nitrogen dioxide, further investigation was necessary in the form of a third stage review and assessment. This included a continuous monitoring programme at a receptor location close to the A14 in Trimley St. Mary (see later).

### **Emissions from traffic using the A12**

Concerns were raised regarding emissions from traffic using the A12, in particular at Farnham and Yoxford. Review and assessment of the A12 was undertaken in the second stage

investigations, to include receptor locations at Farnham. The traffic flow data for the A12 North of its junction with the A1094 turnoff, to Snape and Aldeburgh, was below the levels set in the Government guidance for production of significant sources of air pollution. The A12 North of this point, including Yoxford, was therefore not included in the review and assessment.

Monitoring was undertaken at Farnham to record levels of nitrogen dioxide, these results were then used together with computer modelling to assess emissions from traffic using the A12. The conclusion of the second stage review and assessment was that the risk of the air quality objectives being exceeded was negligible and no further review and assessment was necessary.

### **Emissions from traffic using the A1120**

Concern was again raised regarding emissions from traffic using the A1120. The traffic flow data for this road was below the levels set in the Government guidance for production of significant sources of air pollution and this road was therefore not included within the first stage review and assessment. The entire process must be repeated by the end of 2003, and updated traffic flow data will be obtained for this road to reassess it against the levels set in the guidance.

### **Emissions from the proposed gravel extraction quarry at Bucklesham**

Concern was raised regarding emissions that may result if a proposed gravel extraction quarry at Bucklesham obtained planning approval and commenced operations. During the second stage review and assessment updated guidance was issued by the Government to include any sites operating quarrying activities in the process. Emissions which may result from the proposed gravel extraction quarry at Bucklesham were therefore investigated during the second stage review and assessment.

The conclusions of the second stage review and assessment were that operations at the quarry would not meet the criteria in the Government guidance for exceedance of the objectives and further review and assessment was not necessary. At such time that the quarry site becomes active any problems with dust experienced at relevant receptor locations will trigger further investigations to be undertaken.

### **Particulate Matter (PM<sub>10</sub>) emissions from fugitive sources**

A suggestion was received that consideration should be given in the second stage review and assessment to fugitive releases of particulate matter (PM<sub>10</sub>), to include those from licensed waste disposal facilities, harvesting operations, and from ship out-loading of grain.

During the second stage review and assessment, updated guidance was issued by the Government to include any sites operating waste disposal activities in the process. All relevant sites within the Suffolk Coastal district were therefore investigated. Further review and assessment was necessary for one site at Foxhall due to the number of activities that may produce emissions of particulate matter (PM<sub>10</sub>). Continued review and assessment was undertaken on the combined emission "footprint" of White Mountain Roadstone Limited, traffic using the A12, Foxhall Four Quarry and Foxhall Landfill site. The conclusion of these investigations was that the risk of the objectives being exceeded was negligible and further review and assessment was not necessary.

Regarding emissions from harvesting operations, the Government guidance on particulate matter (PM<sub>10</sub>) recognised that many sources would be beyond the control of the local authority, and no provision was made for emissions from agriculture to be assessed.

Emissions from agricultural practices were unable to be assessed within the remit of Local Air Quality Management.

Regarding fugitive emissions from ship out-loading of grain, this was investigated in the second stage review and assessment with the only activity of this kind occurring within 10 kilometres of the Suffolk Coastal border in Ipswich Borough. This activity was investigated by Ipswich Borough Council, their conclusions were that no further review and assessment was necessary.

## 4. The Third Consultation (March 2002)

### 4.1 Results of the third Consultation

The third Consultation was undertaken once all three review and assessment reports for Suffolk Coastal had been completed and the findings accepted by DEFRA. The Consultation asked for comments on the findings of all three of the reports. A summary table of responses can be seen below, followed by detail for each reply in the second category (those with comments relevant to the scope of the Local Air Quality Management process), and then the Council's response on each topic covered in these replies.

Summary table of responses received to Consultation undertaken on all three stages of the review and assessment process (March 2002)

Number of responses received who were satisfied with the process and/or had no specific comments to make	<b>13</b>
Number of responses received with specific comments relevant to LAQM (expanded upon below)	<b>4</b>
Number of responses received on topics which could not be dealt with under LAQM	<b>2</b>
<b>Total number of responses received</b>	<b>19</b>

Further detail for each reply received in the second category (those with comments relevant to the scope of the Local Air Quality Management process);

- ‘...It is noted that there is a risk that the objectives for the emission of particulate matter from shipping at the Port of Felixstowe may be exceeded. We would be grateful to know what further action is being taken.  
We would be grateful to be kept informed about sulphur dioxide emissions from shipping at the Port of Felixstowe and wish to know whether those emissions constitute a danger to health...’
- ‘...We have considered your letter and would like to emphasise the importance of continuing to monitor emissions from the A14 through the village of Trimley St. Mary and also emissions from the Port of Felixstowe, much of which is within Trimley St. Mary.’
- ‘We feel the air quality on the A1152 will get worse with the increased traffic numbers stemming from the opening of the Sutton Hoo Visitor Centre.’

- ‘...We are concerned that emissions could be a problem in Eyke Street, despite the reassurance that “the risk of objectives being exceeded is negligible”...’

## **4.2 Response to comments**

### **Emissions from shipping at the Port of Felixstowe**

The Third Stage Review and Assessment Report (2001) identified that further review and assessment of sulphur dioxide and particulate matter (PM<sub>10</sub>) emissions from shipping at the Port of Felixstowe was necessary. This is in order to ascertain whether there is a risk that the air quality objectives will be exceeded at any receptor locations.

A sulphur dioxide monitoring programme is currently being undertaken, for a six month period, at a suitable location within the Port of Felixstowe. The results from this monitoring will be used to also assess particulate matter (PM<sub>10</sub>) levels, using proportional calculations obtained from previous studies, in particular the Southampton Dibden Terminal study, as advised by the DEFRA help-line. The findings of this study will be presented in a further Third Stage review and assessment report for the Port of Felixstowe.

Whilst reviewing emissions from shipping activities at the Port of Felixstowe, it has been recommended by our appointed air quality consultants that, due to the scale of operations at the Port of Felixstowe, emissions of nitrogen dioxide and particulate matter (PM<sub>10</sub>) from non-shipping sources should be assessed within the review and assessment process. This has not been highlighted by the Government guidance to date but will be assessed during the next review and assessment process to be completed by the end of the year 2003.

### **Emissions from traffic using the A1152**

The third stage review and assessment of emissions from traffic using the A1152, from the Woods Lane roundabout to the Rendlesham roundabout, showed that the risk of the air quality objectives being exceeded at receptor locations by the end of 2005 was negligible. Further review and assessment is therefore not necessary at this time. These conclusions were reached following detailed computer modelling of the A1152, including specifically the crossroads with the B1438 at Melton, by appointed air quality consultants.

Modelling was based on the most recent available traffic usage data for this road, together with future predicted usage and traffic flows projected from current knowledge. It is accepted, however, that detailed knowledge of future traffic movements and predicted flows may change due to unforeseen circumstances. It is because of this that the air quality management process is a continuing one, which allows for ongoing review of the results. Accordingly review and assessment for the A1152 will be undertaken again in the near future with updated traffic flow data.

In addition, a monitoring programme is being undertaken, to record levels of nitrogen dioxide from traffic, at a suitable location on the crossroads with the B1438 at Melton (Melton crossroads). This monitoring is being undertaken for a minimum of 6 months and was started in February 2002. The results of this monitoring will provide levels of nitrogen dioxide recorded at this site, and enable future levels to be predicted more accurately through detailed computer modelling. The findings of this study will be presented in a further Third Stage Review and Assessment Report for this junction.



### **Emissions from traffic using the A14**

The third stage review and assessment of nitrogen dioxide emissions from traffic using the A14 included three months of continuous nitrogen dioxide monitoring at a relevant receptor location to the A14. The results from this monitoring were then used to undertake detailed computer modelling of road traffic emissions along the A14. The predictions from the computer modelling showed that the objectives are not likely to be exceeded at receptor locations on the A14 by the end of 2005 and, therefore, further review and assessment is not necessary at this time.

As the review and assessment did not show traffic emissions from the A14 to be of concern no further continuous monitoring for nitrogen dioxide is necessary along the A14 at this time. The review and assessment process is, however, to be completed again by the end of the year 2003, during which the A14 will be reassessed using current traffic flow data and modelling techniques advised by the Government guidance at that time. Should traffic emissions from any areas of the A14 be likely to exceed the objectives continuous monitoring for this pollutant will be undertaken at a relevant location.

## **5. Conclusions**

The consultation process for the review and assessment of air quality within the Suffolk Coastal district has been undertaken in accordance with Schedule 11 under Part IV of the Environment Act 1995.

The responses received were collated, for each of the three consultations undertaken, and all aspects raised in the consultation responses, which came within the scope of Local Air Quality Management, have been addressed within the review and assessment process.

Work is continuing to be undertaken by Suffolk Coastal District Council to confirm compliance with the Air Quality Objectives in specific areas.

The review and assessment process must be repeated by the end of 2003, and all issues raised by this consultation process will be reassessed, in accordance with the Government guidance published for this purpose.

## **Appendix A**

### **List of Consultees in Local Air Quality Review and Assessment Process**

The Secretary of State  
The Environment Agency  
The Highways Agency  
Members of Parliament for the Suffolk Coastal District  
Members of the European Parliament for the East of England  
All Local Authorities bordering the Suffolk Coastal District  
Suffolk County Council  
Public Health Authority  
All neighbouring County Councils  
Members of Suffolk Coastal District Council  
Suffolk County Councillors representing Suffolk Coastal District Council  
Suffolk Coastal Parish Councils  
Members of the Suffolk Coastal Greenprint Forum  
Local Business interests  
All Processes authorised under Part I of the Environment Act 1990 (Schedule A and B processes) within Suffolk Coastal or 10 km of its boundary  
Other businesses mentioned within the review and assessment reports  
All business's contacted to complete fuel usage surveys  
Members of the Public who have assisted in the review and assessment process  
Coach Operators within the Suffolk Coastal District  
Utilities Companies  
All domestic premises within the Suffolk Coastal District (via 'Coastline' magazine)  
Suffolk Coastal District Council website; [www.suffolkcoastal.gov.uk](http://www.suffolkcoastal.gov.uk)