

Application: 21/504028/FULL Land At School Lane, Newington ME9 7JU

Proposal: Erection of 25no. residential dwellings and the provision of a 20 space staff car park and 20 space pupil pick-up/drop-off area for Newington C of E Primary School, together with associated access, landscaping, drainage and infrastructure works.

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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 Land at School Lane report submitted by the applicant:***

#### 4.3.1. Consideration of committed development is incomplete

72. The AQA for School Lane [3] does not include 20/505059/FULL (Willow Trees), Eden Meadow (20/501475/FULL), or 21/505722/OUT (128 High Street) as part of the proposed development scenario.

73. Both Willow Trees and Eden Meadow were submitted prior to School Lane so these could have been included. 128 High Street was submitted after School Lane so it is not unusual for this to be missing. However, it is still worth noting that it is not considered.

#### 4.3.2. Initial model does not meet minimum requirements for model adjustment

75. Out of 15 locations, 11 (73%) have an error of 25% or more. The model systematically under-predicts (every location), with an average underprediction of 11.25 µg/m<sup>3</sup>

76. Following the same argument outlined for Eden Meadows given above under the same subsection heading “Initial model does not meet minimum requirements for model adjustment”, the model inputs should have been re-examined and the model re-ran.

#### 4.3.3. Model uncertainty statistics not reported

77. It is usual to report uncertainty statistics concerning the final model, at least RMSE. This has not been done.

78. The pre-adjustment model has weak correlation, an RMSE in excess of 25% of the objective reference of 40 µg/m<sup>3</sup> and a poor fractional bias.

80. As we have already outlined, the initial model should not have proceeded to adjustment via a factor without revision and re-execution.

#### ***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 NO<sub>2</sub>, PM2.5 and PM10 within Newington exceed WHO guidelines for health.
  9. The Newington AQMA has exceed NO<sub>2</sub> 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.

***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.***