

## **Appendix 5**

**From:** Leadbeater Lynden [AAC194@peterborough.gov.uk]

**Sent:** 25 April 2005 11:38

**To:** Beeching, Adrian (Env. Health); gcarson@fenland.gov.uk; Giles Hine; Lewis, Toby (Env Health); Bass David

**Subject:** RE: SO2 DA query DL520

-----Original Message-----

**From:** Duncan Laxen [mailto:DuncanLaxen@aqconsultants.co.uk]

**Sent:** 24 April 2005 22:30

**To:** Beeching, Adrian (Env. Health)

**Cc:** AQM-Review; Nicky Woodfield

**Subject:** RE: SO2 DA query DL520

Sorry about not responding. I have been away from the office a lot recently.

I had not replied to Nicky by email, but my response is below.

I was asked to look at the model contour outputs and comment on an appropriate AQMA boundary. I have not seen any monitoring data, so have no view on whether the model results match the monitoring. In any case, great care will be required in interpreting monitoring, as it is difficult to verify a point source model for short-term concentrations. For point sources greater reliance will need to be placed on model results without any direct verification, and certainly without adjustment (unless there is a substantial amount of monitoring data showing that the model is getting it wrong).

It will not be appropriate to monitor at one location and say that there is no problem in meeting the objective – the location of peak concentrations will move around from year to year.

As the objective is now in place, I would suggest that it is more appropriate to declare an AQMA than to delay, waiting for monitoring results. A further assessment is required following declaration, and this can be used to refine the information on the exceedence area.

I hope this helps and is not too late.

Regards

**Duncan Laxen**

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**From:** Leadbeater Lynden [AAC194@peterborough.gov.uk]  
**Sent:** 14 April 2005 16:32  
**To:** Beeching, Adrian (Env. Health); gcarson@fenland.gov.uk  
**Cc:** Bass David  
**Subject:** FW: SO2 DA query

**From:** AQM-Review [Aqm-Review@uwe.ac.uk]  
**Sent:** 24 November 2004 15:52  
**To:** Leadbeater Lynden  
**Cc:** Bass David; James Longhurst; 'Duncan Laxen (AQC)'  
**Subject:** RE: SO2 Peterborough Fletton brick manufacture (Ref LP2-295)

Lynden,

Following our conversation this afternoon I am writing to confirm the views of the helpdesk regarding your enquiry.

As none of the 3 authorities were in receipt of the information regarding the brickworks when you submitted your Progress Reports earlier this we have not been expecting Detailed Assessments from you until this point. However, the policy guidance states in paragraph 1.66 "*At any time during the Progress Reporting years, if a local authority identifies a risk of Air Quality Objective exceedences, then that authority should proceed to carrying out a Detailed Assessment to identify formally the need to declare any AQMAs. Local authorities in this situation should not delay until the next full round of reviews and assessments.*"

Therefore following consideration of the data that you have submitted to us we recommend that the three authorities (Peterborough, Fenland and Huntingdonshire) work together to submit Detailed Assessments looking at the brickworks in April next year. These should contain analysis of both the modelling data currently available to the LAs and monitoring data from the campaign that you suggest will commence next month. In addition to this any further information regarding emission rates, or proposed control measures should be included in the report.

It will not be necessary to declare any Air Quality Management Areas until this Detailed Assessment has been completed and appraised by Defra.

It should also be ensured by the LAs that the modelling carried out by the Environment Agency does not represent a worse case scenario as the guidance requires the declaration of AQMAs on the basis of 'likely exceedences' rather than 'possible exceedences'.

If you have any questions regarding this issue please do not hesitate to get in contact with us.

Please could you also forward this on to the relevant officers at Fenland and Huntingdonshire councils.

Regards,  
Tim Chatterton.

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**From:** Nicky Woodfield [Nicky.Woodfield@uwe.ac.uk]

**Sent:** 14 April 2005 13:59

**To:** Duncan Laxen

**Cc:** Beeching, Adrian (Env. Health)

**Subject:** SO2 DA query

Duncan,

I've just spoken to Adrian with regards to the situation Huntingdonshire (and others) find themselves in with respect to Hanson Brickworks. I had a query from Graham Carson (Fenlands) yesterday, and it transpires I didn't have all the information to hand on the issue. My advice to Graham had been to submit a DA which specified the outcomes of the modelling work and indicate when the monitoring information would be able from Hansons (I had no information on the modelling or monitoring provided).

Since talking to Adrian, I understand that the three sets of modelling outcomes (2@EA and 1@Hansons), all of which indicate exceedences of the 15-minute objective, but over different spatial extents. From a precautionary viewpoint, you advised that an AQMA should be declare using the worst case, maximum extent contour. Given that real-time monitoring is underway, I had made the point in my advice yesterday that they should await some monitoring results (at least six months), and then base the decision on monitoring and modelling work. Adrian has suggested that given the seasonality of their other AQMA (Wisbech), it would be more appropriate to wait for 12-months of monitoring data.

Is your advice to declare on the basis that they declare now using the worst-case modelling outcomes with a view to utilising the monitoring data as part of the further assessment work? Could Fenland submit their DA which identifies the potential extent of an AQMA but indicate that until monitoring data is available they will not declare? In this case they will need to confirm that on identifying 35 exceedences of the objective during the course of the monitoring period they will have to proceed to declaring an AQMA.

Thanks Duncan,  
Nicky

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