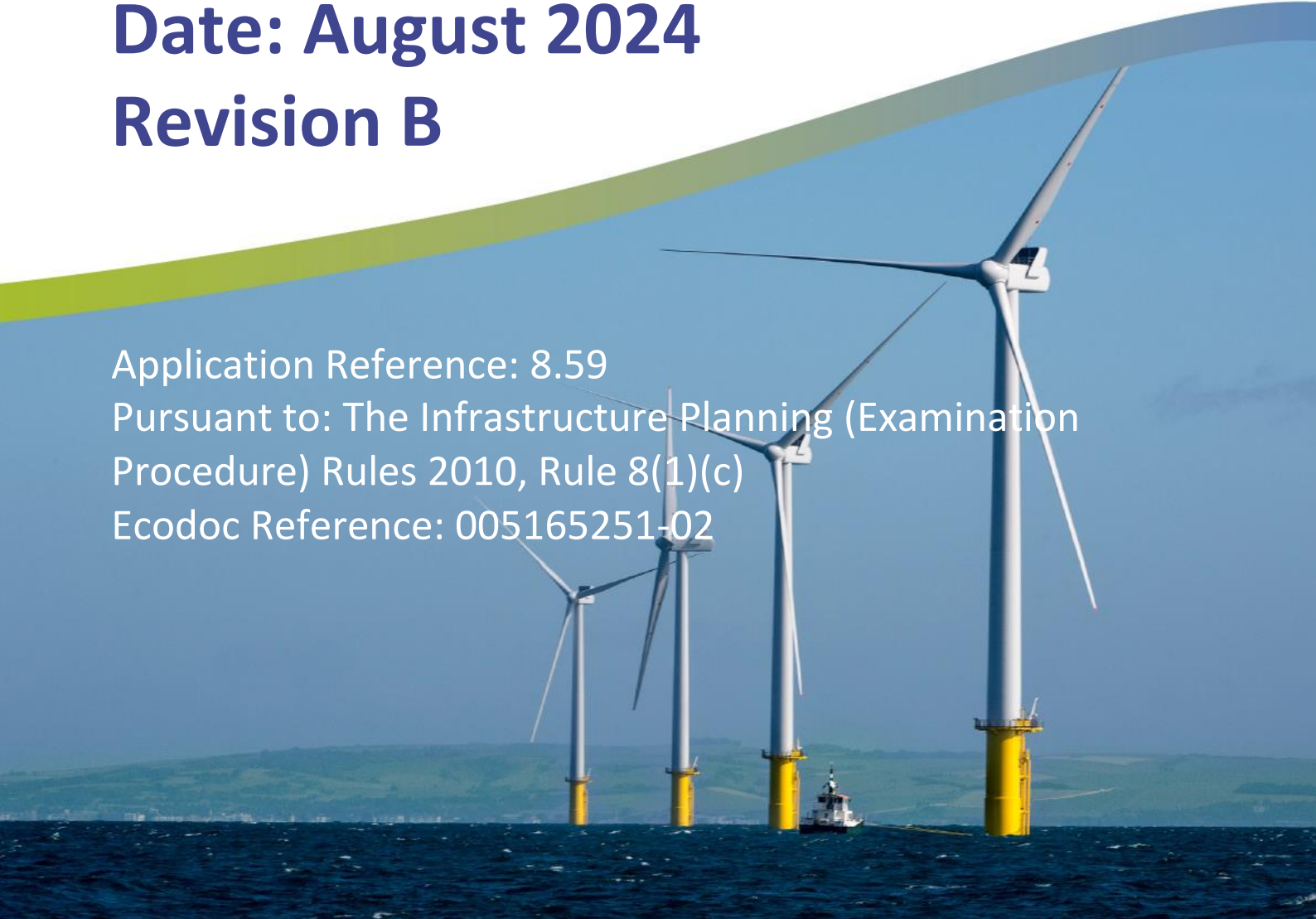


Rampion 2 Wind Farm
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Examination Documents
Air Quality Mitigation Strategy
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Revision B

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Appendix A Traffic Data

1. Introduction

- 1.1.1 This Appendix presents an Air Quality Mitigation Strategy (AQMS) for the Rampion 2 project. The AQMS was updated in July 2024 to reflect the final traffic data for Rampion 2.
- 1.1.2 Rampion 2's first Statutory Consultation exercise under Section 42 of the Planning Act 2008 ('formal consultation') ran from 14 July to 16 September 2021, a period of nine weeks. The PEIR was published as part of the first Statutory Consultation which provided preliminary information on air quality within Chapter 20 of the Preliminary Environmental Information Report (PEIR) (Rampion Extension Development (RED), 2021). During this formal consultation period the following comment was received from Horsham District Council (HDC):
- ".....Although Air Quality and Emissions Mitigation Guidance for Sussex (2021) guidance was written in the context of operational impacts it de facto applies to impacts lasting a number of years. As such it still applies to construction activities that take a number of years to complete."*
- 1.1.3 The AQMS provided in this report addresses the HDC comment by reviewing baseline air quality conditions in the area in which the proposed Development Consent Order (DCO) Order Limits; and available guidance documents in order to identify suitable mitigation options to reduce potential air quality impacts associated with the Proposed Development. The AQMS has also considered detailed feedback from HDC¹ on the appropriate methodology.
- 1.1.4 The policy focussed mitigation measures outlined within this AQMS are both proportionate to the damage cost calculated and in line with the measures outlined in the 'Air quality and emissions mitigation guidance or Sussex' (Mid Sussex District Council (MSDC, 2021) published by a consortium of local authorities in Sussex. Specifically, the AQMS has considered the relevant measures in the West Sussex Transport Plan (West Sussex County Council (WSCC), 2022) and the HDC (2023), MSDC (2023), Worthing Borough Council (WBC) (Adur and Worthing Councils, 2023) and Arun District Council (ADC) (2023) latest Local Air Quality Management (LAQM) Annual Status Reports (ASR).

¹ HDC, 2023, E-mail from Matthew Porter, Senior Planning Officer, dated 10 July 2023.

2. Methodology

2.1 Overview

2.1.1 The methodology undertaken for compiling the AQMS, adapts the approach detailed in Sussex (MSDC, 2021) technical planning guidance and includes the following:

- Traffic data (**Section 2.2**): review the traffic data and duration of the construction schedule to define the Proposed Development classification that will inform the type of mitigation measure applicable;
- Damage Costs (**Section 3**): undertake a damage cost calculation using the Government's Interdepartmental Group on Costs and Benefits (IGCB) (Department for Environment, Food and Rural Affairs (Defra), 2023a) damage cost approach and the Sussex guidance (MSDC, 2021) technical guidance to determine the level of financial contribution that should be spent on mitigation to offset the air quality impact of the Proposed Development; and
- Policy measures review (**Section 4**): review of HDC (2023), WBC (Adur and Worthing Borough Councils, 2023), MSDC (2023) and ADC (2023) latest air quality reports and the West Sussex Transport Plan (WSSCC, 2022) to identify any measures, which could be implemented and/or funded to reduce or offset the effects of the Proposed Development on air quality (if further measures are required).

2.2 Traffic data review

2.2.1 **Chapter 32: ES Addendum, Volume 2** of the ES [REP1-006] was submitted at Deadline 1 which outlines the additional assessments completed since submission of the Development Consent Order (DCO) Application to complement the **Chapter 23: Transport, Volume 2** of the ES [APP-064]. **Chapter 32: ES Addendum, Volume 2** of the ES [REP1-006] also presents an updated assessment of the likely significant air quality effects of construction traffic emissions expected from Rampion 2.

2.2.2 The final Annual Average Daily Traffic (AADTs) data for Heavy Duty Vehicles (HDVs) and Light Duty Vehicles (LDVs) used for damage cost calculations reflect the core road links of the transport and noise assessments in **Chapter 32: ES Addendum, Volume 2** of the ES [REP5-038]. The noise and transport assessment considered data based on the peak week traffic flows for each road link and therefore are not directly comparable with the AADT presented in **Appendix A**. Air quality assessments and damage cost calculations always use AADTs, in line with the Defra Guidance Air quality appraisal: damage cost guidance (2023a) and Sussex guidance (MSDC, 2021).

3. Damage Costs

3.1 Calculations

3.1.1 This document reports the damage costs associated with emissions from traffic expected as a result of the Proposed Development. Emissions of NO_x and PM_{2.5} were estimated from Defra's (2023b) Emission Factor Toolkit (EfT) using Annual Average Daily Traffic (AADTs) from the Proposed Development. The damage cost calculations have considered AADTs within each local authority where traffic from the Proposed Development is expected to result. Using UK Government's online guidance (Defra, 2023a), an appropriate damage cost for each pollutant was selected.

3.2 Calculation of the change in emissions

3.2.1 As discussed, Defra's (2023b) EfT v.12 has been used to calculate the emissions of NO_x and PM_{2.5} from AADTs from traffic associated with the Proposed Development. The traffic associated with the Proposed Development considered consists of construction traffic, therefore an average distance travelled of 10km was applied. An average speed of 50kph was used following guidance published by Sussex-air air quality partnership (Sussex-air air quality partnership, 2021).

3.2.2 **Table 3-1** reports the change in pollutant emissions across the construction phase of the Proposed Development expected within the administrative area of each local authority.

Table 3-1 Change in emissions of NO_x and PM_{2.5}

Year	NO _x emission increase (tonnes)	PM _{2.5} emission increase (tonnes)
Horsham District		
2025	0.03	0.003
2026	0.36	0.045
2027	0.28	0.040
2028	0.05	0.009
Arun District		
2025	0.12	0.012
2026	0.66	0.080
2027	0.19	0.028

Year	NOx emission increase (tonnes)	PM2.5 emission increase (tonnes)
2028	0.09	0.015
Worthing Borough		
2025	0.06	0.007
2026	0.37	0.047
2027	0.15	0.022
2028	0.07	0.012
Mid Sussex District		
2025	0.01	0.001
2026	0.12	0.017
2027	0.10	0.015
2028	0.02	0.004

Damage cost calculation

- 3.2.3 The central road transport average cost were used to calculate damage costs for each local authority and these are presented in **Table 3-2** to **Table 3-9**. The approach chosen is consistent with the worked example included in the Sussex 2021 guidance (Sussex-air Air Quality Partnership, 2021) and feedback from HDC¹.
- 3.2.4 The local authorities of Horsham District Council and Mid Sussex District Council are classed as rural and therefore typically the rural transport average cost (approximately 50% less compared to road transport average cost for NO_x) should apply. Given the sensitivity of the area of Cowfold, this strategy has gone over and above what is required to ensure adequate mitigation is in place for Horsham District Council.
- 3.2.5 The IGCB (Defra, 2021a) published damage cost rates in a tiered approach with a low, central and high damage cost. The AQMS, as detailed above, is using the central road transport average damage cost rate.
- 3.2.6 Following the prescribed approach defined in the UK Government's online guidance (Defra, 2023a), the damage costs were rebased from the price base year of 2022 to the assessment years considered (i.e. 2025-2028) considering inflation (a factor of 1.10 was calculated using the May 2024 GDP Deflator TAG databook). The total cost were then calculated by multiplying the rebased damage costs by the estimated emission increases of each pollutant within each local authority. A discount factor was calculated using the equation below, following the

stepped approach prescribed in the UK Government's online guidance (Defra, 2023a):

$$\text{Discount factor} = 1/(1 + 0.015)^t$$

t = The number of years into the future that value is from the base year (2025)

- 3.2.7 The total costs were multiplied by the discount factors to obtain a discounted cost. **Table 3-2** to **Table 3-9** reports the central damage cost calculations for each local authority. A final summary table is then provided where the overall total damage costs (including the central, high sensitivity and low sensitivity damage costs) are reported in **Table 3-10**.
- 3.2.8 As outlined in **Table 3-10**, the overall central damage cost calculated is **£66,425**.

Table 3-2 Central NO_x damage cost calculations – Horsham District

Year	NO _x increase (tonnes)	NO _x damage costs	Damage costs rebased to 2022	Total cost	Discount factor	Total discounted value
2025	0.03	£11,682	£12,862	£340	1.000	£340
2026	0.36	£11,682	£12,862	£4,689	0.985	£4,620
2027	0.28	£11,682	£12,862	£3,641	0.971	£3,535
2028	0.05	£11,682	£12,862	£702	0.956	£671
Total	0.73			£9,372		£9,166

Table 3-3 Central PM_{2.5} damage cost calculations – Horsham District

Year	PM _{2.5} increase (tonnes)	PM _{2.5} damage costs	Damage costs rebased to 2022	Total cost	Discount factor	Total discounted value
2025	0.003	£84,548	£93,092	£266	1.000	£266
2026	0.045	£84,548	£93,092	£4,214	0.985	£4,152
2027	0.040	£84,548	£93,092	£3,764	0.971	£3,654
2028	0.009	£84,548	£93,092	£836	0.956	£800
Total	0.10			£9,080		£8,871

Table 3-4 Central NO_x damage cost calculations – Arun District

Year	NO _x increase (tonnes)	NO _x damage costs	Damage costs rebased to 2022	Total cost	Discount factor	Total discounted value
2025	0.12	£11,682	£12,862	£1,502	1.000	£1,502
2026	0.66	£11,682	£12,862	£8,434	0.985	£8,310
2027	0.19	£11,682	£12,862	£2,472	0.971	£2,399
2028	0.09	£11,682	£12,862	£1,152	0.956	£1,102
Total	1.05			£13,561		£13,313

Table 3-5 Central PM_{2.5} damage cost calculations – Arun District

Year	PM _{2.5} increase (tonnes)	PM _{2.5} damage costs	Damage costs rebased to 2022	Total cost	Discount factor	Total discounted value
2025	0.012	£84,548	£93,092	£1,158	1.000	£1,158
2026	0.080	£84,548	£93,092	£7,482	0.985	£7,372
2027	0.028	£84,548	£93,092	£2,605	0.971	£2,528
2028	0.015	£84,548	£93,092	£1,374	0.956	£1,314
Total	0.14			£12,619		£12,372

Table 3-6 Central NO_x damage cost calculations – Worthing Borough

Year	NO _x increase (tonnes)	NO _x damage costs	Damage costs rebased to 2022	Total cost	Discount factor	Total discounted value
2025	0.06	£11,682	£12,862	£833	1.000	£833
2026	0.37	£11,682	£12,862	£4,772	0.985	£4,702
2027	0.15	£11,682	£12,862	£1,933	0.971	£1,877
2028	0.07	£11,682	£12,862	£876	0.956	£838
Total	0.65			£8,415		£8,250

Table 3-7 Central PM_{2.5} damage cost calculations – Worthing Borough

Year	PM _{2.5} increase (tonnes)	PM _{2.5} damage costs	Damage costs rebased to 2022	Total cost	Discount factor	Total discounted value
2025	0.007	£84,548	£93,092	£661	1.000	£661
2026	0.047	£84,548	£93,092	£4,393	0.985	£4,328
2027	0.022	£84,548	£93,092	£2,053	0.971	£1,993
2028	0.012	£84,548	£93,092	£1,090	0.956	£1,043
Total	0.09			£8,197		£8,024

Table 3-8 Central NO_x damage cost calculations – Mid Sussex District

Year	NO _x increase (tonnes)	NO _x damage costs	Damage costs rebased to 2022	Total cost	Discount factor	Total discounted value
2025	0.01	£11,682	£12,862	£136	1.000	£136
2026	0.12	£11,682	£12,862	£1,494	0.985	£1,472
2027	0.10	£11,682	£12,862	£1,230	0.971	£1,194
2028	0.02	£11,682	£12,862	£265	0.956	£253
Total	0.24			£3,125		£3,055

Table 3-9 Central PM_{2.5} damage cost calculations – Mid Sussex District

Year	PM _{2.5} increase (tonnes)	PM _{2.5} damage costs	Damage costs rebased to 2022	Total cost	Discount factor	Total discounted value
2025	0.001	£84,548	£93,092	£127	1.000	£127
2026	0.017	£84,548	£93,092	£1,584	0.985	£1,560
2027	0.015	£84,548	£93,092	£1,403	0.971	£1,362
2028	0.004	£84,548	£93,092	£340	0.956	£325
Total	0.04			£3,454		£3,374

Table 3-10 Overall damage costs

Local Authority	Total central damage cost
Horsham District	£18,037
Arun District	£25,685
Worthing Borough	£16,274
Mid Sussex District	£6,429
TOTAL	£66,425

4. Policy measures

- 4.1.1 The LAQM ASRs indicates a lack of availability and resources to fund Air Quality Action Plan (AQAP) measures as a barrier to implementation. The calculated damage cost could therefore be used to offset air emissions by supporting selected Defra funded measures described in the West Sussex Transport Plan (WSSCC, 2022) and LAQM ASRs for the relevant Councils. The measures are summarised as follows:

4.2 Horsham District Council

- Continuation and expansion of the monitoring programme, to include monitoring for particulate matter;
- delivery of the HDC's vehicle replacement programme;
- consideration of the hierarchy of traffic management measures presented in Cowfold Air Quality Management Area scheme proposals review, September 2017;
- expansion of Electric Vehicle Network;
- introduction of on-street electric vehicle charging infrastructure in Horsham; and
- prioritise active travel modes where development takes place and deliver priority cycle routes such as the Horsham to Crawley cycle 75 route.

4.3 Mid-Sussex District Council

- The Sayers Common to Hassocks Cycle Route has been approved by WSSCC and it is hoped that several sections will be completed by the end of 2023. Design work on other sections will commence at the same time.
- Optimize traffic signalling to intelligently respond to pollutant monitoring data at the Stonepound crossroads.
- WSSCC has adopted the West Sussex Electric Vehicle Strategy 2019-2030. Connected Kerb is fully funding EV charging point deployment working with West Sussex County Council, Adur and Worthing, Arun, Crawley, Horsham, MSDC and borough councils.

4.4 Worthing Borough Council

- Working with Sussex-air partners to supplement Defra funded projects (schools/communities and taxi engagement);
- progressing a review of the 2015 Worthing Air Quality Action Plan (WBC, 2015) including a new source apportionment study; and

- working with West Sussex County Council on the Connected Kerb EV charge point project.

4.5 Arun District Council

- The Council's vehicle fleet is currently made up of 18 vehicles, 16 of these are expected to be EV. It is expected that the two remaining vehicles will be replaced with EV, if and when they are able to provide the load capacity required at a responsible cost.
- Continuing participation in, and funding for, the Sussex Air Quality Network which includes seven permanent automatic particulate monitoring sites measuring both PM₁₀ and PM_{2.5}. Currently, none of which are in the district.

5. Conclusions

- 5.1.1 The Rampion 2 project will incur damage costs associated with air emissions from construction traffic. Based on estimates of emissions of air pollutants NO_x and PM_{2,5}, the central road transport average damage costs have been calculated for HDC, MSDC, WBC and ADC following Defra (2023a) guidance. The calculation methodology is consistent with the Air quality and emissions mitigation guidance published by a consortium of local authorities in Sussex (Sussex-air Air Quality Partnership, 2021).
- 5.1.2 The total damage cost calculated is £66,425 of which the majority will be incurred in the Horsham and Arun Districts. Mid-Sussex and Worthing Councils are also subject to damage costs.
- 5.1.3 As there is a general lack of availability and resources to fund AQAP measures, the damage costs could be used to promote the aims of Sussex Council AQAPs through the provision of funding. This AQMS provides a summary of potential projects which are not currently subject to Defra funding which could be selected to offset air emissions from the project in conjunction with the District and Borough councils.

6. Glossary of terms and abbreviations

Table 6-1 Glossary of terms and abbreviations

Term (acronym)	Definition
AQMS	Air Quality Mitigation Strategy
AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area. If a Local Authority identifies any locations within its boundaries where the Air Quality Objectives are not likely to be achieved, it must declare the area as an AQMA. The area may encompass just one or two streets, or it could be much bigger. The Local Authority is subsequently required to put together a plan to improve air quality in that area — a Local Air Quality Action Plan.
AQO	Air Quality Objective. The Air Quality Objectives are policy targets generally expressed as a maximum ambient concentration to be achieved, either without exception or with a permitted number of exceedances, within a specified timescale. The Objectives are set out in the UK Government's Air Quality Strategy for the key air pollutants.
Construction	Used both to refer to the whole construction phase of a project, and more specifically to refer to an activity involved in the provision of a new structure (building, road, etc.).
HDC	Horsham District Council
IAQM	Institute of Air Quality Management.
NO_x	Nitrogen oxides
NO₂	Nitrogen dioxide.
PC	Process contribution.
PEC	Predicted environmental contribution.
Preliminary Environmental Information Report (PEIR)	The written output of the preliminary environmental assessments as required under the Infrastructure Planning 'Environmental Impact Assessment' Regulations 2017. It is developed to support public statutory consultation and presents the preliminary findings of the assessment to allow an informed view to be developed of the Proposed Development, the assessment approach that has been undertaken, draw preliminary conclusions on the likely significant

Term (acronym)	Definition
PM	effects of the Proposed Development and environmental measures proposed
PM	Particulate matter. Microscopic portions of solid matter suspended in air. This includes a wide range of particle sizes and different chemical constituents. It consists of both primary components, which are emitted directly into the atmosphere, and secondary components, which are formed within the atmosphere as a result of chemical reactions. Commonly used to refer to both PM ₁₀ and PM _{2.5} .
PM₁₀	Particulate matter smaller than 10 µm in diameter.
PM_{2.5}	Particulate matter smaller than 2.5 µm in diameter.
Proposed Development	The development that is subject to the application for development consent, as described in Chapter 4: The Proposed Development, Volume 2 of the ES [APP-045].
Receptor	These are as defined in Regulation 5(2) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and include population and human health, biodiversity, land, soil, water, air, climate, material assets, cultural heritage and landscape that may be at risk from exposure to pollutants which could potentially arise as a result of the Proposed Development.

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Appendix A

Traffic data

EIA transport receptor	Local Authority	Description	Annual Average Daily Traffic (AADT)							
			Year 1		Year 2		Year 3		Year 4	
			HDV	LDV	HDV	LDV	HDV	LDV	HDV	LDV
1	Arun	Ferry Road	0	5	5	25	0	3	0	4
2	Arun	Church Lane	4	22	18	119	4	13	2	17
3	Arun	Ford Road	0	6	0	33	0	3	0	5
4	Arun	A27 West of Arundel	2	2	21	14	17	2	6	2
5	Arun	A259 West of Wick	3	18	18	101	3	12	2	14
6	Arun	A284 North of Wick	3	6	18	40	3	13	2	5
7	Arun	A284 Lyminster	4	6	20	40	3	13	4	5
8	Arun	Crossbush Lane, Crossbush	0	0	0	0	0	0	0	0
9	Arun	A27, Arundel Station	2	3	21	18	17	3	6	2
10	Arun	Crossbush Lane, Warning Camp	0	0	0	0	0	0	0	0

EIA transport receptor	Local Authority	Description	Annual Average Daily Traffic (AADT)							
			Year 1		Year 2		Year 3		Year 4	
			HDV	LDV	HDV	LDV	HDV	LDV	HDV	LDV
11	Arun	A27, South of Crossbush	7	5	44	37	21	13	10	5
12	Worthing	A27 High Salvington	7	2	36	9	8	1	11	1
13	Worthing	A24/A27 Offington (Warren Road)	7	2	36	9	8	1	11	1
14	Worthing	A24 Findon	0	2	0	30	0	23	0	4
15	Arun	A280 Long Furlong	1	2	26	20	22	11	10	2
16	Horsham	A283 West of A24	0	4	8	70	0	44	0	7
17	Horsham	A283 East of A24	1	9	11	140	14	72	4	11
18	Horsham	B2135, South of Ashurst	0	1	3	14	4	8	2	1
19	Horsham	A283, Steyning	2	1	14	21	18	11	4	2
20	Horsham	A24, South of A272	0	4	9	53	8	42	1	9
21	Horsham	B2116 Patridge Green Road	0	0	0	2	0	2	0	0
22	Horsham	A281, South Shermanbury	0	1	4	17	4	25	3	6
23	Horsham	A281, South of Cowfold	0	1	1	18	1	26	1	6
24	Horsham	A281, Cowfold Center	0	4	9	48	8	60	1	14

EIA transport receptor	Local Authority	Description	Annual Average Daily Traffic (AADT)							
			Year 1		Year 2		Year 3		Year 4	
			HDV	LDV	HDV	LDV	HDV	LDV	HDV	LDV
25	Horsham	A272, Station Road, Cowfold	0	4	9	48	8	60	1	14
26	Horsham	Wineham Lane, South of A272	0	1	0	9	4	13	1	3
27	Mid Sussex	A272, West of A23	1	3	23	45	22	57	3	13
28	Mid Sussex	A23, North of the A272	4	1	28	18	19	22	7	5
29	Mid Sussex	B2188, Sayers Common	0	0	0	0	0	0	0	0
30	Mid Sussex	B2116, Henfield Road, Albourne	0	0	0	0	0	0	0	0
31	Worthing	A23, North of the A272	4	2	33	15	22	13	7	3
32	Worthing	A27, West of A23	6	3	41	23	25	8	11	2
33	Worthing	A27, East of A23	3	2	21	22	14	16	5	4
34	Arun	A259, West of Church Street	1	4	7	23	1	4	1	3
35	Arun	A259 East of Wick	0	6	0	38	0	8	0	6

