

# West Street Andover Stopping-Up Order: Review of Air Quality Assessment

**Client<sup>1</sup>:** Mr Adrian Truss  
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## 1. Introduction

- 1.1. Kalaco Group Ltd (**'Kalaco'**) has been instructed by Mr Adrian Truss to review the air quality assessment undertaken to support the planning application by Test Valley Council for the closure/stopping-up of West Street and removal of the southbound carriageway of the Western Avenue gyratory in Andover.
- 1.2. This review has been undertaken to inform the consideration of the associated stopping-up order under section 247 of the Town and Country Planning Act 1990. While the statutory test for such an order is whether it is necessary to enable development to be carried out in accordance with planning permission, it is appropriate to have regard to the environmental and health effects of the underlying development, insofar as these form part of the planning merits of the scheme and any representations made in relation to the proposed stopping up order.
- 1.3. Air quality is a key determinant of human health and is a material consideration within national and local planning policy. Accordingly, this review considers whether the assessment robustly identifies the potential impacts on air quality and associated health outcomes, with reference to relevant local plan policies which seek to prevent unacceptable impacts on human health and to ensure that development mitigates and minimises adverse environmental effects.

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- 1.4. The planning application (ref. 25/01047/FULLN) was approved on 3 October 2025 subject to 17 planning conditions. These include condition 06:

*“No development shall take place until assessments of air and noise (including vibration) impacts arising from the demolition and construction works have been carried out, and detailed mitigation schemes to address identified impacts have been submitted to and approved in writing by the Local Planning Authority. The submitted scheme shall demonstrate the adoption and use of the best practicable means to minimise the effects of noise, vibration, dust. Development shall be carried out in accordance with the approved details. Reason: Details are required prior to the commencement of development in the interests of amenity in accordance with Test Valley Borough Revised Local Plan 2016 policy E8.”*

- 1.5. The Test Valley Borough Revised Local Plan 2016 policy E8 states (emphasis added):

*“Development will be permitted provided that it does not result in pollution<sup>116</sup> which would cause unacceptable risks to human health, the natural environment or general amenity.*

*Development that would or could potentially generate pollution will only be permitted if it can be demonstrated that there **would not be any adverse impact on human health**, the natural environment **or general amenity**.*

*Development which is sensitive<sup>117</sup> to pollution will only be permitted if the intended users are not subject to unacceptable impact from existing nearby uses having taken account of proposed mitigation measures.”*

- 1.6. This review has considered the following report:

MEC Consulting Group, March 2025, Western Avenue, Riverside Park, Andover, Air Quality Assessment, ref 28483-ENV-04-2 Rev B ('MEC AQA')

- 1.7. The expertise of the contributors to this report is set out in Appendix A1.

## 2. The Scheme

- 2.1. Briefly, the scheme is for the improvement of the green space located around the River Anton, facilitated by the removal the existing one-way route around the green space. Western Avenue and West Street will become two-way, and West Street will also become a dead-end road with an area for vehicles to turn at the end of the road. There is a bus station at the end of West Street. West Streets provides access to a number of residential properties on Portland Grove including Chantry Lodge, and a Lidl supermarket, the bus station, and service yard.

## 3. Expertise of Air Quality Assessment Authors

- 3.1. Air quality is a highly technical discipline. The author of the MEC report is an Associate Member of the Institute of Air Quality Management (IAQM), a membership category that requires, when awarded prior to 2025, no experience of working in air quality. The report has been checked and approved by two people, neither of whom is a member of IAQM. Their qualifications are MIOA (i.e. an acoustic consultant) or MCIHT/MTPS (i.e. a highway/transport consultant). Therefore, without access to their calculations, there can be no confidence in the reliability of the MEC AQA.



- 3.2. IAQM guidance documents<sup>2</sup> have been referenced in numerous planning applications, planning inquiries and case law related to air quality assessments and are considered the relevant guidance documents for air quality assessments to support planning applications.
- 3.3. The MEC AQA quotes from the EPUK/IAQM guidance (Environmental Protection UK & Institute of Air Quality Management, 2017) in a number of places but ignores the need for competent and suitably qualified professionals to undertake the assessment. The guidance states (emphasis added):

*“2.18 A judgement of the significance of the impacts is to be made by a **competent professional** who is **suitably qualified**, and the reasons for reaching the conclusions should be transparent and set out logically...”*

- 3.4. It is good practice to provide a short biography of those involved in the production of an air quality assessment (AQA) to provide confidence that the authors are competent, experienced and qualified. This has not been included in the MEC AQA, and the quality of the assessment (discussed later) clearly demonstrates a lack of experience.

## 4. AQA Contents

- 4.1. The MEC AQA is missing several important elements:

1. An assessment of the PM<sub>2.5</sub>. This is a requirement from the Department of Environment, Farming, and Rural Affairs (Defra). Defra’s Guidance (Defra, 2024) was published prior to the planning application. The guidance, which focuses on minimisation of emissions of PM<sub>2.5</sub> and its precursors, should be applied in the design process and documented within planning application documents. Evidence of the application of the guidance is typically set out as part of an AQA. This was not undertaken.
2. Need to reduce emissions. It is government policy to minimise emissions/improve air quality (e.g. NPPF paragraph 199). The MEC AQA quotes from the EPUK/IAQM guidance yet fails to describe how the proposed scheme will minimise the air quality impacts. The guidance states:

*“4.12 ...An important focus of this guidance is on minimising the air quality impacts of all developments for which air quality assessments have been requested by the planning authority; this will be through good design and application of appropriate mitigation measures”.*

3. Adverse impact on health. The Test Valley Borough Revised Local Plan 2016 policy E8, which is relevant to the assessment, states (emphasis added):

*“Development that would or could potentially generate pollution will only be permitted if it can be demonstrated that there **would not be any adverse impact on human health...**”*

The assessment has considered impacts in relation to compliance with national air quality objectives and limit values. It has not demonstrated that there would not be **any** adverse impact on human health or amenity.

4. Construction impact assessment. This should have been undertaken for the planning application to enable the risk of exposure to particulate matter (PM<sub>10</sub>) and dust to be assessed. The IAQM risk assessment methodology identifies appropriate mitigation measures for the estimated risk. Without the risk assessment, the risk is unknown.

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<sup>2</sup> [Guidance – IAQM](#)



Contractors are often appointed before the planning conditions are fulfilled, and unless it is explicitly included in contract agreements there is a temptation to minimise mitigation. It is, therefore, good practice to include the demolition and construction impact assessment in an AQA. The Test Valley Borough Revised Local Plan 2016 policy E8, which is relevant to the assessment, states the following, which has not been done by the assessment:

*“Development that would or could potentially generate pollution will only be permitted if it can be demonstrated that there **would not be any adverse impact ... general amenity.**”*

5. Reference to the Local Plan. The MEC AQA fails to mention the Test Valley Local Plan or the relevant local planning policies.

## 5. Guidance

- 5.1. Defra’s Local Air Quality Management Technical Guidance ([LAQM.TG22](#)) (Defra, 2025) is aimed at local authorities undertaking their air quality review and assessment duties. It is about assessing where the air quality objectives (AQOs) are exceeded and identifying appropriate measures to improve air quality.
- 5.2. The EPUK/IAQM guidance (Environmental Protection UK & Institute of Air Quality Management, 2017) is specifically aimed at how air quality should be assessed in the planning system. Since its publication it has been widely accepted as an authoritative source of information. As air pollution levels have declined, however, it has become less relevant, and it no longer reflects best practice (Institute of Air Quality Management, 2025). IAQM has fully revised this guidance for publication later in 2026.
- 5.3. It is now widely accepted that there is no threshold below which there are no health impacts of the pollutants assessed in the MEC AQA (NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>). In 2021, the World Health Organization (WHO) published its revised air quality guidelines (AQGs) (World Health Organization, 2021) - for annual mean concentrations the WHO AQG for NO<sub>2</sub> is one quarter of the threshold in legislation and for PM<sub>2.5</sub> the WHO AQGs are half the threshold in legislation as shown in Table 1. Details of the relevant air quality legislation are provided in Appendix A2.

Table 1: Annual Mean Air Quality Standards, Targets and Guidelines (µg/m<sup>3</sup>)

Pollutant	English Legislation <sup>a</sup>	EU Legislation 2024 <sup>b</sup>	WHO AQGs 2021
NO <sub>2</sub>	40	20	10
PM <sub>10</sub>	40	20	15
PM <sub>2.5</sub>	10	10	5

Table notes:  
a. PM<sub>2.5</sub> target to be achieved by 2040. NO<sub>2</sub> and PM<sub>10</sub> to be achieved by 2004/2005/2010 (depending on the legislation).  
b. 2024 EU Directive requires compliance by 2030

- 5.4. It is also noteworthy that the European Union adopted more stringent standards for these pollutants in 2024 and Scotland is in the process of revising its standards with the intention of aligning with the EU. England may also follow in the near future.
- 5.5. Whilst it remains important that any AQA considers compliance with the AQOs and the limit values, it should be recognised that the legislated thresholds do not take account of the current evidence on the health effects. When considering the health effects (as explicitly defined in policy E8 of the Test Valley Revised Local Plan) the non-threshold effects of air pollution should be taken into account. Different approaches are used by different consultancies and the future IAQM guidance will provide useful information on methodologies. However, it is now considered best practice to include an assessment of the effects on health by contextualising the impacts in relation to the WHO AQGs.



## 6. Dispersion Modelling

- 6.1. The AQA states that the modelling used ADMS v5.1 and Defra's LAQM.TG22 guidance. LAQM.TG22 is explicit that the section on dispersion is for local authorities to review and assess air quality in their area. It is not specifically designed for use in AQAs for planning applications.
- 6.2. The MEC AQA provides insufficient information to enable an independent evaluation of the dispersion modelling. For example, the following are missing from the report:
- Baseline traffic and air quality data for 2023. It appears that the only dispersion modelling for the base year was that undertaken at three monitoring sites to estimate a model adjustment factor.
  - Traffic data. No information was provided in either the Stantec Transport Assessment (TA) (Stantec, April 2025) or the MEC AQA on how the AM and PM peak traffic data provided in the Stantec TA was converted to annual average daily traffic (AADT) used in the MEC AQA.
  - Diurnal traffic variation. The MEC AQA appears to have simply divided the AADT by 24 to derive an hourly traffic flow. It is good practice to apply a diurnal traffic profile to reflect the hourly variation in emissions and the meteorological data used in the model.
  - Street canyon module in ADMS. This is not mentioned and therefore is presumed not to have been used. This accounts for the significant effect of buildings on the dispersion of traffic emissions and is particularly important when assessing the changes to West Street, which is surrounded by multi-storey buildings. This is a major omission from the assessment.
  - Topography. Local topography can have a significant impact on dispersion.
  - Roughness length and minimum Monin-Obukhov length. These parameters affect the turbulence in the atmosphere, again affecting dispersion (as illustrated by it being windier in open countryside than in urban centres) and hence an important parameter affecting dispersion in urban areas.
- 6.3. The baseline (2023) model was verified using NO<sub>2</sub> concentrations measured at two locations close to a railway line along the A343 New Street, Andover, and a third monitoring location on the Winchester Road (see MEC AQA Appendix F, page 38). Neither location was representative of the area of interest. No justification was given for the choice of these locations, but they are unlikely to be representative of the area affected by the changes to the local roads. The use of monitoring locations which are not representative of the area of interest means the model performance in the areas of interest has not been evaluated, again leading to concerns over the certainty of the modelling.
- 6.4. The model verification factor was 3.7, i.e. the model underestimated concentrations by a factor of almost 4. It is recognised that accurately modelling air quality is difficult, but a robust model should have a verification factor of between 1 and 2. The MEC AQA stated:
- "It is considered that any attempts to reduce the verification factor further, would not be representative of the real world conditions at the links in question. Nevertheless, the calculated RMSE is less than 5% and is acceptable for assessment purposes."*
- 6.5. The calculated RMSE was for locations not representative of the area affected by the road changes. Therefore, there can be no confidence that the model is performing well in the areas impacted by the scheme.
- 6.6. The model was verified for NO<sub>2</sub> concentrations, with the same factor applied to the PM<sub>10</sub> and PM<sub>2.5</sub> estimated concentrations. There was no discussion regarding the limitations of this approach.
- 6.7. No account for uncertainty was included in the assessment.



## Predicted Impacts

- 6.8. The Stantec TA provides data for road links in passenger car units (PCUs) as a standard matrix accounting for different vehicle types (car, HGVs, etc). PCU factors represent the effects of changes in traffic composition, such as headway, speed and size. It is not a useful matrix for air quality dispersion modelling.
- 6.9. Stantec forecast traffic to increase by 17.2% from the baseline (2024/2025) to 2040 under the 'do minimum' scenario.
- 6.10. The MEC AQA considers the impacts of the stopping-up of West Street in 2040. It is unclear whether 2040 is the anticipated opening year. If the earliest year the scheme could be operational is sooner than 2040, then it is likely that the impacts have been underestimated.
- 6.11. The stopping-up of West Street will change the road from one way to two-way traffic, increasing traffic on West Street from its junction with Western Avenue to north of the first Lidl carpark exit, and decreasing traffic from the Lidl car park exit to the end of West Street. This is illustrated in Table 2.

Table 2: West Street Traffic (AADT) (From MEC AQA)

Road Link	2024/2025 Baseline	2040 Do Minimum <sup>a</sup>	2040 Do Something
North of Lidl	Data not provided	2,021	4,568
South of Portland Grove		2,609	3,016
South of Lidl		3,921	1,257
Note: a. Described in the MEC AQA as Do Nothing, which is not correct, as it assumes traffic growth and is therefore a Do Minimum scenario.			

- 6.12. Increases in predicted annual mean NO<sub>2</sub> concentrations of approximately 0.9 to 1.0 µg/m<sup>3</sup> were predicted at the ground floor level receptors 4, 7, 15 and 16. Receptors 4 and 7 are on the northern section of West Street, and 15 and 16 are to the west of Western Avenue.
- 6.13. In the context of the regulated thresholds this is not material, but in the context of non-threshold effects and the WHO AQG, it becomes more important. The increase is ca. 10% of the WHO AQG. Given there is no threshold below which there is no impact, an increase in annual mean NO<sub>2</sub> concentrations of this order could be regarded as important, and thus a material consideration. Note that policy E8 states (emphasis added): *“Development that would or could potentially generate pollution will only be permitted if it can be demonstrated that there **would not be any adverse impact on human health...**”*.
- 6.14. The predicted NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations are all below the regulated thresholds. The predicted NO<sub>2</sub> and PM<sub>10</sub> concentrations are also mainly below the WHO AQG.
- 6.15. The predicted PM<sub>2.5</sub> concentrations, however, exceed the WHO AQG. Road transport is a more important source of NO<sub>2</sub> than PM, and therefore the PM<sub>2.5</sub> impacts of the stopping-up of West Street are smaller, and at most ca 2% of the WHO AQG. However, there is widely accepted uncertainty in the PM<sub>2.5</sub> emission rates used in the MEC AQA, which are likely to significantly underpredict emissions.
- 6.16. In the absence of transparency and evidence of competency of the assessors, there are major concerns that the impacts are understated and explanation of the uncertainty in assessment has not been presented for review.



## 7. Summary and Conclusions

- 7.1. There is no confidence that the MEC AQA accurately predicts the air quality impacts of stopping-up West Street on the closest residential properties, i.e. the houses on West Street and Portland Grove and the Chantry Lodge apartments.
- 7.2. In particular, there is no evidence that the street canyon module of the dispersion model was used by MEC to estimate the air quality. The apparent failure to consider the restricted dispersion due to the presence of multi-storey buildings in the north section of West Street is likely to underestimate the impacts. However, it is very unlikely that the air quality thresholds set in legislation will be exceeded.
- 7.3. Annual mean NO<sub>2</sub> concentrations are predicted to increase by ca. 10% of the WHO AQG. Given there is no threshold below which there is no impact, an increase in annual mean NO<sub>2</sub> concentrations of this order could be regarded as important, and thus a material consideration; for example, in relation to policy E8. Furthermore, this worsening of air quality is predicted to occur when government policy is to improve air quality. There is uncertainty regarding these predicted impacts due to the potential under-estimation of air quality.
- 7.4. MEC has not addressed the issues in Defra's interim planning guidance on the PM<sub>2.5</sub> targets. In particular, the need for development to reduce emissions of PM<sub>2.5</sub> and its precursors (e.g. NOx) have not been evidenced.
- 7.5. In relation to the stopping-up order, the health effects are clearly not aligned with local planning policy and this should be a material consideration in the stopping-up order decision.

## 8. Glossary

<b>AADT</b>	Annual Average daily traffic
<b>AQA</b>	Air Quality Assessment
<b>AQGs</b>	Air Quality Guidelines
<b>AQO</b>	Air Quality Objectives
<b>Defra</b>	Department of Environment, Farming and Rural Affairs
<b>EPUK</b>	Environmental Protection UK
<b>EU</b>	European Union
<b>IAQM</b>	Institute of Air Quality Management
<b>LAQM</b>	Local Air Quality Management
<b>LAQM.TG22</b>	Local Air Quality Management Technical Guidance
<b>MEC</b>	MEC Consulting Group
<b>PM</b>	Particulate Matter
<b>PM<sub>2.5</sub></b>	Particulate Matter with an aerodynamic diameter less than 2.5 microns
<b>PM<sub>10</sub></b>	Particulate Matter with an aerodynamic diameter less than 10 microns
<b>TA</b>	Transport Assessment



**WHO** World Health Organization  
**µg/m<sup>3</sup>** Microgram per cubic metre. A measure of pollutant concentration.

## 9. References

- Defra. (2024). PM2.5 Targets: Interim Planning Guidance .*
- Defra. (2025). Local Air Quality Management Technical Guidance .*
- Environmental Protection UK & Institute of Air Quality Management. (2017). Land-use Planning & Development Control: Planning for Air Quality.*
- HM Government. (2025). Environmental Improvement Plan.*
- Institute of Air Quality Management. (2025). Retrieved from [http://iaqm.co.uk/wp-content/uploads/2025/02/IAQM\\_Briefing\\_Land-use\\_Guidance\\_25.pdf](http://iaqm.co.uk/wp-content/uploads/2025/02/IAQM_Briefing_Land-use_Guidance_25.pdf)*
- Stantec. (April 2025). Riverside Park, Western Avenue, Andover, Transport Assessment, Project No 332612230.*
- World Health Organization. (2021). Air Quality Guidelines: Particulate Matter (PM2.5 and PM10), Ozone, Nitrogen Dioxide, Sulfur Dioxide and Carbon Monoxide.*



## A1. Professional Experience

### [Kieran Laxen, MEng \(Hons\) MEnvSc MIAQM](#)

A1.1. Kieran is a Director and the founder of Kalaco. He has nearly 20 years' experience in air quality and during this time has worked on hundreds of projects, including port schemes, road schemes, residential and commercial developments, industrial processes, energy from waste sites, and infrastructure projects. He has extensive experience of ambient air quality monitoring and dispersion modelling for planning and permit applications. Kieran is the Institute of Air Quality Management (IAQM) Vice Chair and is leading the development of professional guidance documents on dispersion modelling, greenhouse gas assessment and air quality assessment for planning. He developed Kalaco's meteorological data services, processing Met Office data and creating numerical weather prediction (NWP) data. He is also an independent advisor to the Welsh Government on the Clean Air Advisory Panel.

### [Claire Holman, BSc \(Hons\), PhD CSci CEnv FEnvSc FIAQM](#)

A1.2. Claire, a Director of Kalaco and has over 45 years of experience in air quality management. She has advised national governments in Europe, Asia and Africa, as well as the European Commission on a range of strategic air quality and climate change issues. She has undertaken a large number of air quality, odour and dust assessments for planning and permit applications, and provided expert evidence for inquiries, hearings, litigation and Parliamentary Committees. She has critically reviewed assessments undertaken by other consultants for local planning authorities and residents' groups. Claire has contributed to the development of IAQM professional guidance, is the honorary IAQM President and a former IAQM chair, has been a member of a government air quality review group, chairs the Welsh Government's independent panel on NO<sub>2</sub> compliance and advised the Department for Transport on their cleaner vehicles and fuels research programme and is a visiting professor at the University of West of England.

### [Paul Outen BSc \(Hons\) MEnvSc MIAQM](#)

A1.3. Paul is an Associate Director of Kalaco and has over 17 years' experience in the field of air quality and odour consultancy, with extensive experience in the assessment of air quality and odours from a wide range of industries across the UK, Europe and China. He is experienced in undertaking all types of air quality assessments for both planning and permitting purposes. Paul has successfully acted as an expert witness at public hearings and inquiries.



## A2. Air Quality Objectives, Limit Values and Targets

Table A1: Relevant Air Quality Legislation

Legislation	Text
<p>The Environment Act 1995</p> <p>Air Quality Regulations 2000 (SI 2000/98)</p> <p>Air Quality (England) (Amendment) Regulations 2002 (SI 2002/3043)</p>	<p>Part IV of The Environment Act requires the Government to produce an Air Quality Strategy that must include standards and objectives for the quality of air and measures for the purpose of achieving these objectives.</p> <p>The 1995 Act, as amended by the Environment Act 2021, also sets out the requirements of the Local Air Quality Management (<b>LAQM</b>) regime which requires local authorities to carry out regular reviews and assessments of air quality in its area to identify whether the air quality objectives (AQOs) are achieved at relevant locations. If this is not the case, the authority must declare an AQMA and prepare an action plan which identifies appropriate measures to be introduced in pursuit of the objectives.</p> <p>The AQOs for England are set out in the 2000 and 2002 Regulations. These AQOs are policy targets expressed as a maximum ambient concentration for a specific averaging period, not to be exceeded, either without exception or with a permitted number of exceedances, within a specified timescale.</p>
<p>Air Quality Standards Regulations 2010 (SI 2010/1001)</p> <p>Air Quality Standards (Amendment) Regulations 2016 (SI 2016/1184)</p> <p>The Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020 (SI 2020/1313)</p>	<p>In addition to the AQOs, the European Union (<b>EU</b>) has set limit and target values for the protection of human health, and critical levels for the protection of ecosystems. These were transposed into UK legislation by the 2010 Regulations.</p> <p>The 2016 amendment makes changes to the sampling methodology in Part 3 Schedule 1 and requires the Secretary of State to fully document the monitoring network design. This must be reviewed every five years.</p> <p>The Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020 reduced the EU annual mean limit value for PM<sub>2.5</sub> from 25 to 20 µg/m<sup>3</sup>.</p> <p>Like the AQOs, the LVs, target values and critical levels are set for individual pollutants and are made up of a concentration value, an averaging time over which it is to be measured, the number of exceedances allowed per year (if any), and a date by which it must be achieved. Some pollutants have more than one value covering different dates or averaging times.</p> <p>Note: Since the UK left the EU, a new ambient air quality directive was adopted in 2024 with tighter limits to be achieved from 2030.</p>
<p>Environment Act 2021</p> <p>Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 (SI 2023/96)</p>	<p>This Act requires the Secretary of State to set a long-term target (defined as no less than 15 years after the date on which the target was set) to reduce people's exposure to PM<sub>2.5</sub>. It also enables the Secretary of State to set other air quality targets, including for other air pollutants.</p> <p>The targets are an annual mean concentration target (<b>AMCT</b>) of 10 µg/m<sup>3</sup> by 2040 together with a 35% population exposure reduction target (<b>PERT</b>) by 2040 compared to 2018. The 2023 Regulations set these targets in legislation.</p> <p>The Secretary of State must prepare an environmental improvement plan (<b>EIP</b>) and produce an annual report on the implementation of the EIP, including progress towards meeting the targets. Every five years the EIP must be reviewed. The most recent EIP was published in 2025 (HM Government, 2025). This includes two ITs to be achieved by December 2030. These are an annual mean of 10 µg/m<sup>3</sup> and an exposure reduction target of 30% compared to 2018.</p>
<p>Table notes: All legislation cited is available at <a href="https://legislation.gov.uk">legislation.gov.uk</a>. The statutory instrument number for Regulations is given in brackets.</p>	