

NATTRAN/SE/S247/6126

TVBC/TR/2

PLANNING PERMISSION REF: 25/01047/FULLN

TEST VALLEY BOROUGH COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

SECTION 247

PROPOSED STOPPING UP OF HIGHWAY AT WESTERN AVENUE, ANDOVER, HAMPSHIRE

OS GRID REFERENCE [436202, 145700 – 436283, 145515]

REBUTTAL PROOF OF EVIDENCE

ON BEHALF OF THE APPLICANT

AIR QUALITY

TIM ROSE, BA(HONS) MCIHT MTPS

REGIONAL DIRECTOR

MEC CONSULTING GROUP

TABLE OF CONTENTS

1. INTRODUCTION.....	1
2. SCOPE OF EVIDENCE	1
3. KALACO REPORT	1
4. STATEMENT OF TRUTH.....	2

1. INTRODUCTION

- 1.1. My name is Tim Rose. The details of my qualifications and experience are included in my main proof of evidence dated 9 June 2026.
- 1.2. In this rebuttal proof of evidence, the defined terms in my proof of evidence apply unless specified otherwise.
- 1.3. This rebuttal evidence is prepared on behalf of the Council and produced in support of an application under section 247 of the TCPA 1990 to stop up highway in the Borough of Test Valley in relation to planning permission reference 25/01047/FULLN.
- 1.4. Reference to CD/[x] are to documents in the Core Documents.

Declaration

- 1.5. The evidence which I have prepared and provide in this proof of evidence is true and I confirm that the opinions expressed are my true and professional opinions.

2. SCOPE OF EVIDENCE

- 2.1. This rebuttal proof of evidence should be read in conjunction with my proof of evidence dated 9 June 2026 (CD/11.21), along with the Statement of Case dated 29th May 2026 (CD/9.01) and the proofs of evidence of David Jowsey (Local Highway Authority) (CD/11.22), Fay Smiles (Planning) (CD/11.24), and Phil Brady (Transport) (CD/11.01) dated 9 June 2026 and the rebuttals proofs of evidence of Ross Rawlings (Road Safety), Phil Brady (Transport) dated 16 June 2026 and Fay Smiles (Planning) dated 16 June 2026.
- 2.2. The purpose of my rebuttal proof of evidence is to respond to additional issues raised by the objectors to the SUO Application in proofs of evidence received. My rebuttal proof of evidence is not intended to be an exhaustive response on all matters and deals only with certain points where it is considered appropriate or helpful to respond in writing at this stage. Where a specific point has not been dealt with, this does not mean that these points are accepted, and they may be addressed further at the Inquiry.

3. KALACO REPORT

- 3.1. Adrian Truss submitted a proof of evidence on 7 June 2026 (CD/12.01), a supplemental proof of evidence on 8 June 2026 (CD/12.02) with an accompanying technical assessment from Charles and Associates (CD/12.04). A technical report from Kalaco Environmental Consulting (the "Kalaco Report") was submitted to the Council by Adrian Truss on 5 June 2026 (CD/12.08).
- 3.2. Section 3 of the Kalaco Report addresses the qualifications of those who prepared the MEC Air Quality Assessment (CD/5.1.08). While not affiliated with the Institute of Air Quality Management (IAQM), the author and first reviewer of the Air Quality Assessment have an extensive 23+ years of combined experience in the assessment and evaluation of road traffic pollutants on both human and ecological receptors, providing technical reports and environmental chapters for residential and commercial developments, regeneration projects, designated sites and more.
- 3.3. Section 5 of the Kalaco Report discusses the guidance applicable for air quality reviews and section 6 discusses the guidance applicable for dispersion modelling. The Air Quality Assessment was undertaken in accordance with current UK air quality policy and criteria (see Para 4.12 of Tim Rose Proof of Evidence) using appropriate modelling software (ADMS-Roads), which is widely employed by both local authorities and air quality practitioners, This methodology is used on most planning applications whereby local policy relates back to the relevant National Policy.
- 3.4. The modelling methodology is in line with the recommendations from the developer of ADMS-Roads; Cambridge Environmental Research Consultants (CERC), incorporating the most relevant published monitoring data, appropriate road alignments and building heights including

for street canyons where applicable, and local meteorological data, with all input information available on request.

- 3.5. In the Kalaco Report at Para 6.7 there is reference to no account for uncertainty being used in the assessment, however, uncertainty has been included within the assessment approach as shown in Para 4.21 of the MEC Air Quality Assessment, with verification indicating that the model could be under or over predicting pollution concentrations by between +/- 1.9 µg/m³.
- 3.6. However, in order to account for any uncertainty, a worst case approach has been adopted, whereby the 2040 future year scenario has been modelled using 2025 background and emissions data. Background concentrations and vehicle emission factors are projected to decrease year on year due to fleet composition and technological changes, and therefore, using 2025 data provides a conservative assessment approach.
- 3.7. The model used in the Air Quality Assessment demonstrates that, based on this conservative approach, concentrations of NO₂, PM₁₀ and PM_{2.5} will satisfy the current Air Quality Objective (AQO) levels.
- 3.8. The Kalaco Report also discusses the World Health Organization (WHO) air quality guidelines, which for clarity, do not constitute national policy. In any event, it needs to be recognised that the stated targets within the WHO guidelines are significantly lower than the AQO levels currently used within national policy, and the ability to achieve these desirable targets will vary by location and local conditions, such as whether the setting is rural, or in this case, an urban town centre.
- 3.9. However, it should be noted that in this instance, the worst case modelled scenario indicates that for the most part, concentrations of NO₂ and PM₁₀ are predicted to be below the desirable WHO targets, as well as the policy thresholds. This is acknowledged in the Kalaco Report at paragraph 6.1.4. Where exceedances to the WHO targets are experienced, which in this case predominantly relates to PM_{2.5}, these exceedances are also present for the baseline scenario, i.e., without the stopping up order in place.
- 3.10. The Kalaco Report also acknowledges at paragraph 7.2 that overall "it is very unlikely that the air quality thresholds set in legislation will be exceeded".
- 3.11. In all scenarios, the actual impact from the stopping up order is predicted to be small, and in my view would not materially change the local air quality conditions, and modelling in accordance with national policy has demonstrated that relevant AQOs will be met at the most exposed receptor locations.

4. STATEMENT OF TRUTH

- 4.1. I confirm that insofar as the facts stated in this Statement are within my own knowledge I have made clear which they are and I believe them to be true, and that the opinions I have expressed represent my true and complete professional opinion.
- 4.2. I confirm that my statement includes all facts which I regard as being relevant to the opinions which I have expressed and that attention has been drawn to any matter which would affect the validity of those opinions.

Signed: 

Name: Tim Rose

Date: 16 June 2026