

Crowborough Army Training
Camp
Air Quality Technical Note

Revision 2
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OFFICIAL SENSITIVE

Prepared for:

Home Office

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1. Introduction

1.1 Overview

- 1.1.1 [REDACTED] has been appointed by the Home Office (the Applicant) to prepare an Air Quality Technical Note to accompany the submission of a planning application for an Urgent Crown Development Order (UCDO) for the continued use of the Crowborough Army Training Camp in East Sussex (hereafter referred to as 'the Site') as non-detained accommodation for asylum seekers for a temporary period until 22nd January 2030 (hereafter the 'Proposed Development'). Whilst the Training Camp (also known as Beacon Camp or the wider site) covers 64 hectares (ha), the Site extends to 19.68 ha and is shown on the Site Location Plan (see **Appendix A**).
- 1.1.2 In January 2026, the Applicant received planning permission under Class Q, Part 19 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 ("the 2015 Order") for works to set up a facility to accommodate 540 asylum seekers for a period of 12 months (referred to as the 'Extant Consent'). The Extant Consent expires on 22nd January 2027 and therefore the purpose of this planning application is to seek approval for the Home Office to continue to operate the Site as asylum accommodation for a temporary period until 22nd January 2030.

1.2 Legislation and Planning Policy Context

- 1.2.1 This section sets out the legislation, planning policy and guidance of relevance that has been considered within this assessment.

Legislation

- Air Quality Standards Regulations 2010 (as amended) (Ref. 1, Ref. 2, Ref. 3, Ref. 4) – set out the legally binding Air Quality Limit Values for pollutants to be achieved by the UK Government;
- Environment Act 1995 (Ref. 5) – establishes the Local Air Quality Management (LAQM) regime, introducing the requirement for Local Authorities to monitor air quality in their administrative area against Air Quality Objectives, and set Air Quality Management Areas (AQMAs) where required. Also introduced the requirement for the government to prepare an Air Quality Strategy (AQS) on how to achieve the Objectives;
- Air Quality (England) Regulations 2000 (as amended) (Ref. 6, Ref. 7) – set the Air Quality Objectives for local authorities to achieve as part of the LAQM regime;
- Environment Act 2021 (Ref. 8) – updates the Environment Act 1995, requiring updates to the AQS every 5 years, improving environmental governance, and requires the government to set new regulations on fine particulate matter (PM_{2.5});
- Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 (Ref. 9) – set new target for PM_{2.5};
- Environmental Protection Act 1990 (Ref. 10) – defines the concept of statutory nuisance with regard to dust and odour, and how it is to be enforced by local authorities; and
- Conservation of Habitats and Species Regulations 2017 (Ref. 11) as amended – Provides for the protection of ecological sites designated under European directives and defines Critical Levels and Critical Loads for the assessment of air quality impacts on such designated sites.

National Policy

- National Clean Air Strategy (Ref. 12) – published as part of the 25 Year Plan, provides government strategy on delivering clean air;
- A Green Future: 25 Year Plan to Improve the Environment (Ref. 13) – outlines the government's plan to improve the UK environment, including reference to how to tackle air pollution. The plan was updated in 2025 (Ref. 14);

- UK Air Quality Strategy (Ref. 15) – provides guidance to local authorities on actions the government expects to be taken to achieve the Air Quality Objectives as part of their LAQM duties. The pollutants of relevance to this assessment are displayed in Table 1.1. The Limit Values, Objective values and Target values are collectively referred to in this assessment as Air Quality Assessment Levels (AQALs);
- National Planning Policy Framework (Ref. 16) – sets out the Government's planning policies for England and how these should be applied; and
- Planning Practice Guidance (PPG) (Ref. 17) – the Air Quality section of the PPG provides guidance on how planning applications can take account of the impact of new developments on air quality.

Table 1.1 Air quality assessment levels of relevance to this assessment

Pollutant	Averaging Period	Value (µg/m ³)	Notes
Nitrogen dioxide (NO ₂)	Annual Mean	40	
	1-Hour Mean	200	Not to be exceeded more than 18 times per year (99.79 th Percentile)
Carbon monoxide (CO)	8-Hour Running Mean	10,000	Maximum, 100 th Percentile
	1-Hour Mean	30,000	Maximum, 100 th Percentile. Environment Agency guidance
PM ₁₀	Annual Mean	40	
	24-Hour (Daily) Mean	50	Not to be exceeded more than 35 times per year (90.41 st Percentile)
PM _{2.5}	Annual Mean	20	
Oxides of nitrogen (NO _x)	Annual Mean	30	For the protection of vegetation and ecosystems
	24-Hour Mean	200	For the protection of vegetation and ecosystems. See Technical Guidance section

Source: UK Air Quality Strategy (Ref. 15)

Local Planning Policy

- Wealden District Council (WDC) Core Strategy Local Plan 2013 (Ref. 18) – the Core Strategy Local Plan contains policy WCS12 Biodiversity which contains particular protection for the Ashdown Forest Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Special Area of Conservation (SAC) from developments close to the designated sites, and explicitly refers to nitrogen emissions from the increased number of vehicles on roads crossing the ecology site. Policy WCS12 originally contained a requirement for mitigation for developments within 7km of Ashdown Forest SAC, SPA, and an exclusion zone of 400m for any net increase in dwellings;

In 2015, the Court of Appeal issued a judgement, which became known as the Wealden Judgement, removed the distance criteria (Ref. 19) meaning that local authorities had to give regard to impacts on designated the ecological sites from all developments which may impact the designated sites; and

- WDC New Local Plan (Ref. 20) – Currently in draft status and under consultation, it contains policies that directly refer to air quality or pollution, and others that have pollution noted as a concern following initial consultation responses. While the New Local Plan is only at consultation stage, it does provide a guide as to the future priorities of WDC. The main policies of note are:
 - NE5 – Ashdown Forest SPA – direct reference to impacts of air pollution on designated habitats;
 - NE12 – Air Pollution – noted as a concern in the District due to development of all scales, with particular regard to Ashdown Forest and Pevensy Levels; and
 - SS9 – Health, Well Being and Quality of Life – reference is made to pollution in general on residents' health.

Technical Guidance

1.2.2 There is currently no statutory guidance for developers on assessing air quality impacts on sensitive receptors with respect to planning. The following non-statutory technical guidance provides screening criteria and technical guidance on assessing air quality, and has been considered within the assessment:

- Local Air Quality Management Technical Guidance (TG22) (Ref. 21);
- Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) Guidance on Land-use Planning and Development Control: Planning for Air Quality (Ref. 22);
- Natural England Guidance – Air Pollution and development: advice for local authorities (Ref. 23);
- Environment Agency Guidance: Air emissions risk assessment for your environmental permit (Ref. 24); and
- Defra – PM_{2.5} Targets: Interim Planning Guidance (Ref. 25).

1.3 Scope of Assessment

1.3.1 The Proposed Development comprises the continued use of existing non-detained asylum accommodation for up to 540 residents on the Site for a temporary period until 22nd January 2030, and there is no proposed construction work as part of the continued use.

1.3.2 The assessment therefore considers the potential emissions to air during the operation of the Proposed Development:

- Operation of existing hybrid (battery and diesel powered) generators on the Site; and
- Road traffic flows during operation.

2. The Site

2.1 Overview

- 2.1.1 The Site lies in Wealden District in East Sussex. It is located 2.5km southwest of Crowborough town centre and the urban fringe of Crowborough extends to the entrance of the Training Camp on Uckfield Road (the A26).
- 2.1.2 The Site covers an area of 19.68ha and is surrounded by a 2m high perimeter fence. The Site contains 95 individual buildings arranged within a broadly rectangular central area. Most of these buildings are used for accommodation, with other buildings used for catering, training, offices, healthcare and a gym. Some buildings are currently fenced off and not used. Internal roads and footpaths provide circulation throughout the Site, with several car parking areas distributed across the Site. Existing infrastructure present on the Site comprises generators, CCTV cameras, ablution blocks, the temporary kitchen ancillary units and lighting towers. The areas between buildings and infrastructure are predominantly grassed, with sporadic tree planting. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- 2.1.3 Most recently the Site was used by the Ministry of Defence (MoD) as transitional accommodation for the Afghan Resettlement Programme in 2024 and since January 2026 has been used to provide temporary accommodation for asylum applicants.
- 2.1.4 The Site is mostly surrounded by woodland, with agricultural land beyond. A timber suppliers and industrial units are situated to the immediate south. The nearest residential properties are Birchfield Farm which is located on The Warren adjacent to the south of the Site, Jackman's Lodge 100m to the north-west and a recent housing development 200m to the east of the Site near the A26 Uckfield Road.

2.2 Sensitive Receptors

- 2.2.1 The area around the Site is predominantly rural with a mix of open fields and woodland, with some isolated residential properties, including farms, spread throughout the area. The nearest settlement is Crowborough, which is 1.6km to the north-east, although residential properties extend close to the Site.
- 2.2.2 The nearest human health receptors are Birchfield Farm located adjacent to the south of the Site, Jackmans Lodge 100m to the north-west and a recent housing development located 200m to the east, along the A26, and Brown Knoll Farm to the west, with commercial units adjacent to the southern boundary. Further residential properties are located along the A26 to the north-east towards Crowborough beyond.
- 2.2.3 Ashdown Forest SSSI, SAC, and SPA is located 280m to the south, extending to approximately 2-2.5km to the west and north of the Site. There are also areas of Ancient Woodland and Priority Habitats located near the Site boundary and between the Site and Ashdown Forest and Crowborough. The location of the Site in relation to the identified receptors is shown in **Figure A1** in **Appendix A**.

3. Proposed Development

3.1 Overview

3.1.1 The Applicant is intending to seek planning permission for:

'Continued use of Crowborough Army Training Camp (sui generis) as non-detained asylum accommodation for up to 540 residents together with associated site infrastructure for a temporary period until 22nd January 2030.'

3.1.2 The Proposed Development does not constitute any changes to the Site in terms of additional construction activities or changes to its operation.

3.1.3 No construction or groundworks are proposed and the existing facilities that have been installed on the Site under the Extant Consent (including ablution blocks, CCTV cameras, lighting towers, generators and the temporary kitchen ancillary units) will be retained and continue to be used on a temporary basis.

4. Baseline Conditions

4.1 Overview

- 4.1.1 WDC undertake air quality monitoring within their administrative area, with two monitoring locations in Crowborough (Ref. 26). The details of the monitoring are shown below in **Table 4.1**.

Table 4.1 WDC monitoring data

Site ID	X	Y	Site Type	Annual Mean Nitrogen Dioxide Concentration (µg/m ³)				
				2019	2020	2021	2022	2023
W1	552591	130667	Urban Background	12	9.2	15.7	9.3	8.2
W2	551626	131090	Roadside	21.9	14.1	10.3	15.3	14.3

- 4.1.2 Defra publish background maps presenting concentrations of nitrogen dioxide, oxides of nitrogen, PM₁₀ and PM_{2.5} at the centre point of each 1km x 1km grid square across the UK (Ref. 27). For nitrogen dioxide, oxides of nitrogen and Particulate Matter (PM₁₀ and PM_{2.5}), the latest maps use a baseline year of 2021, and projections forward to 2040. This assessment uses projected background concentrations for 2026. For carbon monoxide, the last background maps published were for 2001 without future projection. The reported concentrations for the grid square containing the Site and the surrounding grid squares, are shown in **Table 4.2**. The Site is located in the centre grid square – 549500, 129500.

Table 4.2 Defra background map pollutant concentrations

Grid Square Centre Point		Background Annual Mean Concentration (µg/m ³)				
X	Y	NO ₂	NO _x	PM ₁₀	PM _{2.5}	CO
548500	128500	6.8	8.6	9.2	5.6	215.0
548500	129500	6.6	8.4	9.0	5.5	215.0
548500	130500	6.5	8.3	8.6	5.5	215.0
549500	128500	6.8	8.6	9.1	5.6	220.0
549500*	129500*	6.8	8.6	8.9	5.6	224.0
549500	130500	6.6	8.4	8.8	5.5	224.0
550500	128500	6.7	8.5	9.0	5.6	230.0
550500	129500	7.1	9.0	8.9	5.6	236.0
550500	130500	7.0	8.9	8.9	5.7	236.0

* Grid square containing the Site

- 4.1.3 The monitoring data and background data from Defra report similar concentrations, with slightly higher concentrations reported for urban background compared to the rural concentrations from the Defra background maps. Concentrations are slightly elevated at roadside locations, though all data indicate that concentrations are less than 30% of the relevant AQALs.
- 4.1.4 Concentration and deposition data at the Ashdown Forest SSSI, SAC, SPA has been sourced from the Air Pollution Information system (APIS) (Ref. 28), operated by the UK Centre for Ecology and Hydrology (UKCEH). Data for the area of the designated ecological site closest to the Site is shown in **Table 4.3**.

Table 4.3 APIS background data for Ashdown Forest SSSI, SAC, SPA

Feature type	Critical Levels ($\mu\text{g}/\text{m}^3$)			Nutrient Nitrogen Deposition Critical Load ($\text{kg}/\text{ha}/\text{yr}$)	Acid Deposition Critical Load ($\text{keq}/\text{ha}/\text{hr}$)			Background Concentrations ($\mu\text{g}/\text{m}^3$)			Background Nutrient Nitrogen Deposition ($\text{kg}/\text{ha}/\text{yr}$)	Background Acid Deposition ($\text{keq}/\text{ha}/\text{hr}$)	
	NO _x	SO ₂ *	NH ₃ *		MinCLminN	MinCLmaxN	MinCLmaxS	NO _x	SO ₂	NH ₃		N	S
Broadleaved deciduous woodland	30	10	1	10-15	0.142	1.338	1.196	7.8	0.64	0.91	19.95	1.43	0.15
Dry heaths	30	10	1	5-15	0.499	0.809	0.31				12.77	0.91	0.12

* The Critical Level for SO₂ and NH₃ has been set at the lower level due to the presence of lichens and bryophytes. Where these are not present nor an integral part of the ecosystem, then the Critical Levels can be set at 20 $\mu\text{g}/\text{m}^3$ and 3 $\mu\text{g}/\text{m}^3$ respectively.

- 4.1.5 The background data for the Ashdown Forest SSSI, SAC, SPA shows that concentrations of oxides of nitrogen, sulphur dioxide and ammonia are all below the relevant Critical Levels, however nutrient nitrogen and acid deposition rates are above the lower end of the relevant Critical Load ranges.

5. Assessment of Potential Impacts

5.1 Overview

5.1.1 The assessment considers the potential impacts from the sources identified for the Proposed Development, as follows:

- Continued operation of hybrid (battery and diesel powered) generators; and
- Road traffic flows on the surrounding road network.

5.2 Hybrid (Battery and Diesel Powered) Generators

5.2.1 The following hybrid (battery and diesel powered) generators are in use at the Site, and these will continue in operation as part of the Proposed Development:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

5.2.2 [REDACTED]

5.2.3 Due to the size of each generator and their mode of operation, their location [REDACTED], and the disperse nature of the emissions, it is considered that the continued operation of the generators would not give rise to any perceptible change in pollutant concentrations (nitrogen dioxide, oxides of nitrogen or particulate matter) at any on or off-site receptor location.

5.3 Road Traffic Emissions

5.3.1 The operation of the Proposed Development will see no change in traffic flows on the surrounding road network compared to the current approved operation of the Site. Traffic flows from the Site are up to [REDACTED] two-way vehicle trips per day ([REDACTED] and [REDACTED]).

5.3.2 Guidance published by the IAQM (Ref. 22) provides a screening criteria to determine if a development is likely to require an Air Quality Assessment, as below these criteria it is considered that changes in pollutant concentrations at road side receptors would be so low as to be considered imperceptible as it would be within the range of inter-year variations.

5.3.3 An Air Quality Assessment is likely to be required where there is a change in Annual Average Daily Traffic (AADT) flows of:

- For Light Duty Vehicles (<3.5t):
 - 100 AADT inside or adjacent to an AQMA; or
 - 500 AADT at all other locations
- For Heavy Duty Vehicles (>3.5t)
 - 25 AADT inside or adjacent to an AQMA; or
 - 100 AADT at all other locations.

- 5.3.4 As the maximum total number of vehicles is less than these criteria, it is considered that a detailed assessment of potential air quality impacts is not required, as the associated changes in pollutant concentrations would not be perceptible and any effects are not likely to be significant.

5.4 Consideration of PM_{2.5}

- 5.4.1 When selecting a development site exposure to PM_{2.5} can be reduced by:
- Selecting a location in a rural area with low population density and with a large offset from areas of work to the nearest residential, health care or educational properties.
 - Selecting a site with low levels of PM_{2.5} and precursors, with agricultural activities being the main baseline source.
 - Recognising the inherently very low level of emissions of PM_{2.5} and precursors associated with the operation of the Proposed Development and seeking to ensure sufficient offset between sources and receptors, and the use of generators which comply with relevant emission standards.
- 5.4.2 The Proposed Development conforms with the above principles.
- 5.4.3 Actions and/or mitigation measures to minimise cumulative PM_{2.5} exposure for the Proposed Development users and nearby residents include:
- Most exposure to PM_{2.5} is associated with the background contribution of emissions undergoing long range transport. The Proposed Development will minimise emissions by using appropriately sized generators for the required use, to provide supplementary power to a mains supply.

6. Conclusions

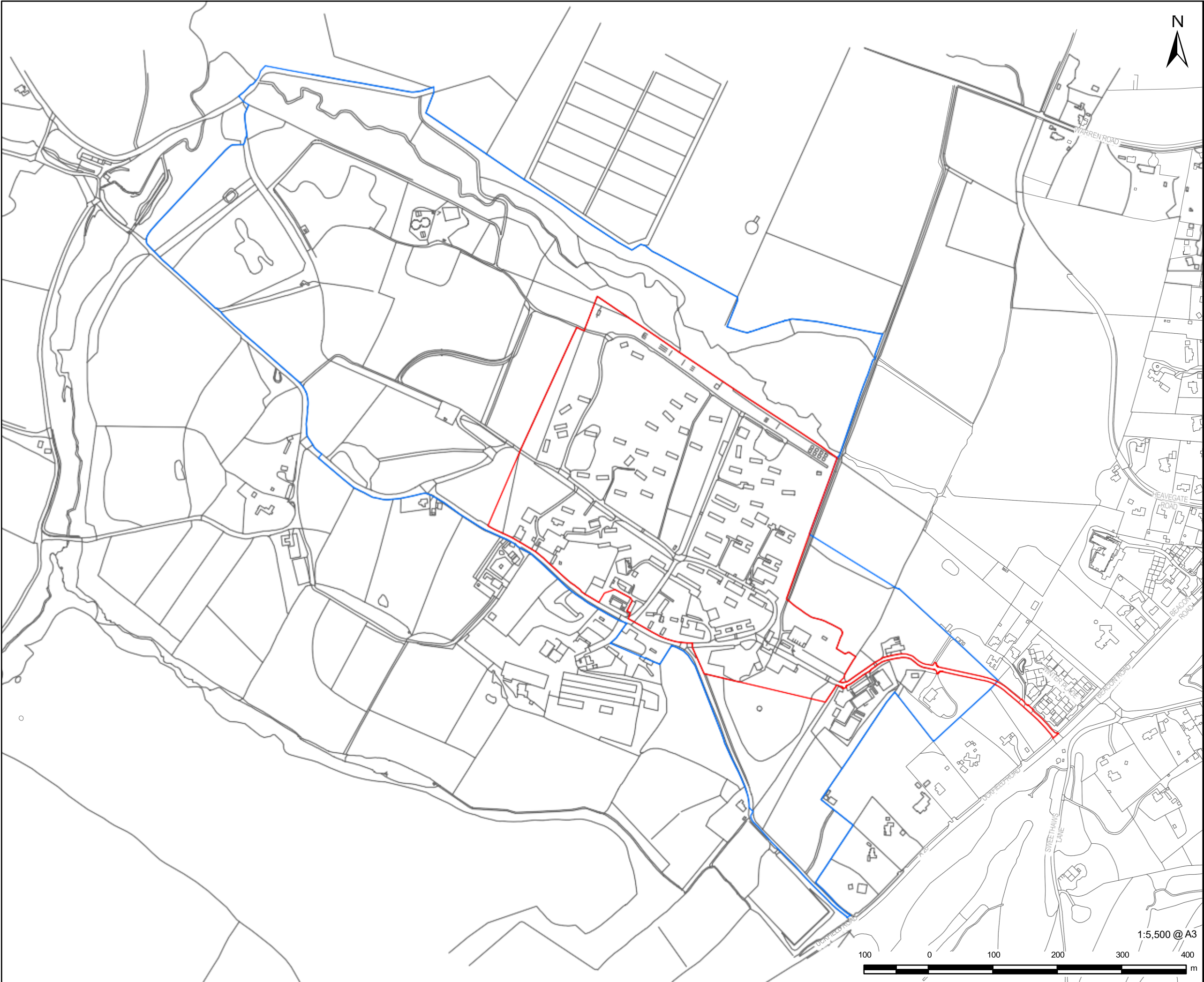
- 6.1.1 This Air Quality Technical Note has considered the potential impacts from the operation of the Proposed Development until 2030. These operations are a continuation of current operations on the Site and have been re-assessed with consideration given to any updates to published background data or changes in planning policy.
- 6.1.2 There are no planned changes to the existing operations on Site, with the continued use of small, isolated generators and no change in road traffic accessing the Site. It is considered that the operation of the Proposed Development until January 2030 would not give rise to any significant air quality effects and that the conclusions of the previous assessment in the EIA Screening Direction for the Extant Consent remain valid.
- 6.1.3 For the previous assessment, the Secretary of State in their Written Direction (Ref. 29) agreed that any potential air quality impacts from the Site would not give rise to any significant effects at any sensitive receptors, including Ashdown Forest SSSI, SAC, SPA, and that further assessment could be screened out on that basis. With specific regard to impacts on ecological sites, Natural England concurred with the previous assessment that the Proposed Development could be screened out of further assessment (Ref. 30). Consultation with Natural England was held on 5th August 2026 regarding the Proposed Development. In their written response (Ref. 31) Natural England agreed with the conclusion of the EIA Screening request (July 2026) that there are no likely significant effects on statutorily designated nature conservation sites or landscapes, and that an EIA is not required for the continued use of the Site to January 2030.

7. References

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[REDACTED]
[REDACTED] 08 January 2026, Ref: 537247
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[REDACTED] Home Office, 05 August 2026

Appendix A Site Location Plan



PROJECT
Crowborough Army Training
Camp
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CONSULTANT

LEGEND
 Site Boundary
 Land Ownership Boundary

NOTES
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ISSUE PURPOSE
For Approval

PROJECT NUMBER
60790127

DRAWING NUMBER
60790127--00-XX-XX-DR-
EN-000001-OS Rev 01

FIGURE TITLE
Site Location Plan

FIGURE NUMBER
Figure 1

