



Cabbagefield
Row,
Leigh Park,
Havant

Air Quality Assessment

August 2021



Ref: 20-7165

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1. Introduction

Background

This report has been prepared to support the planning permission for residential development of about 150 dwellings.

The proposed development has the potential to cause air quality impacts at sensitive locations during the construction and operational phases, as well as expose future occupants to elevated pollution levels. As such, an air quality assessment was needed to find baseline conditions at the site, consider its suitability for the proposed end-use and assess potential effects associated with the scheme.

Site Location and Context

The site is found at Cabbagefield Row, Leigh Park, Havant, at approximate National Grid Reference (NGR): 470650, 109574. Reference should be made to Figure 1 for a map of the site and surrounding area.

The proposals include of the development of circa 150 council housing dwellings on the land known as Cabbagefield Row, Havant.

The development has the potential to cause impacts at sensitive locations. These may include fugitive dust emissions associated with construction works and road traffic exhaust emissions from vehicles travelling to and from the site during the operational phase. Further to this, the proposals may introduce future occupants to any existing air quality issues at the site. An air quality assessment was therefore undertaken to find baseline conditions, consider location suitability for the proposed end-use and consider potential effects because of the proposals. This is detailed in the following report.

2. Legislation and Policy

UK Legislation

The Air Quality Standards Regulations (2010) came into force on 11th June 2010 and include Air Quality Limit Values (AQLVs) for the following pollutants:

- NO₂;
- Sulphur dioxide;
- Lead;
- Particulate matter with an aerodynamic diameter of less than 10µm (PM₁₀);
- Particulate matter with an aerodynamic diameter of less than 2.5µm;
- Benzene; and,
- Carbon monoxide.

Target Values were also provided for an additional 5 pollutants. These include:

- Ozone;
- Arsenic;
- Cadmium;
- Nickel; and,
- Benzo(a)pyrene.

Part IV of the Environment Act (1995) requires UK Government to produce a national Air Quality Strategy (AQS) which contains standards, objectives and measures for improving ambient air quality. The most recent AQS was produced by the Department for Environment, Food and Rural Affairs (DEFRA) and published in July 2007¹. The AQS sets out Air Quality Objectives (AQOs) that are maximum ambient pollutant concentrations that are not to be exceeded either without exception or with a permitted number of exceedances over a specified timescale. These are in line with the AQLVs, although the requirements for the determination of compliance vary.

Table 1 presents the AQOs for pollutants considered within this assessment.

Table 1: Air Quality Objectives

Pollutant	Air Quality Objective	
	Concentration (µg/m ³)	Averaging Period
NO ₂	40	Annual mean
	200	1-hour mean, not to be exceeded on more than 18 occasions per annum
PM ₁₀	40	Annual mean
	50	24-hour mean, not to be exceeded on more than 35 occasions per annum

¹ The AQS for England, Scotland, Wales and Northern Ireland, DEFRA, 2007.

Table 2 summarises the advice provided in DEFRA guidance² on where the AQOs for pollutants considered within this report apply.

Table 2: Examples of Where the Air Quality Objectives Apply

Averaging Period	Objective Should Apply At	Objective Should Not Apply At
Annual mean	All locations where members of the public might be regularly exposed Building façades of residential properties, schools, hospitals, care homes.	Building façades of offices or other places of work where members of the public do not have regular access Hotels, unless people live there as their permanent residence Gardens of residential properties Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term
24-hour mean	All locations where the annual mean objective would apply, together with hotels Gardens of residential properties	Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term
1-hour mean	All locations where the annual mean and 24 and 8-hour mean objectives apply. Kerbside sites (for example, pavements of busy shopping streets) Those parts of car parks, bus stations, and railway stations, etc, which are not fully enclosed, where members of the public might be expected to spend one hour or more Any outdoor locations where members of the public might be expected to spend one hour or longer	Kerbside sites where the public would not be expected to have regular access

Local Air Quality Management

Under Section 82 of the Environment Act (1995) (Part IV) Local Authorities (LAs) are needed to periodically review and assess air quality within their area of jurisdiction under the system of Local Air Quality Management (LAQM). This Review and Assessment of air quality involves comparing present and future pollutant concentrations against the AQOs. If it is predicted that levels at locations of relevant exposure, as summarised in Table 2, are likely to be exceeded, the LA must declare an Air

² Local Air Quality Management Technical Guidance (TG16), DEFRA, 2018.

Quality Management Area (AQMA). For each AQMA the LA must produce an Air Quality Action Plan, the objective of which is to reduce pollutant concentrations in pursuit of the AQOs.

Dust Legislation

The main requirements with respect to dust control from industrial or trade premises not regulated under the Environmental Permitting (England and Wales) Regulations (2016) and later amendments, such as construction sites, is that provided in Section 79 of Part III of the Environmental Protection Act (1990). The Act defines nuisance as:

"any dust, steam, smell or other effluvia arising on industrial, trade or business premises and being prejudicial to health or a nuisance."

Enforcement of the Act, about nuisance, is currently under the jurisdiction of the local Environmental Health Department, whose officers are deemed to provide an independent evaluation of nuisance. If the LA is satisfied that a statutory nuisance exists, or is likely to occur or happen again, it must serve an Abatement Notice under Part III of the Environmental Protection Act (1990). Enforcement can insist that there be no dust beyond the boundary of the works. The only defence is to show that the process to which the nuisance has been attributed and its operation are being controlled according to best practical means.

National Planning Policy

The National Planning Policy Framework³ (NPPF) was published in February 2019 and sets out the Government's planning policies for England and how these are expected to be applied.

The purpose of the planning system is to contribute to the achievement of sustainable development. To ensure this, the NPPF recognises 3 overarching objectives, including the following of relevance to air quality:

"c) An environmental objective - to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

Chapter 15 of the NPPF details objectives in relation to conserving and enhancing the natural environment. It says that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

[...]

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever

³ NPPF, Ministry of Housing, Communities and Local Government, 2019.

possible, help to improve local environmental conditions such as air and water quality [...]"

The NPPF specifically recognises air quality as part of delivering sustainable development and states that:

"Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. As far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local Air Quality Action Plan."

The implications of the NPPF have been considered throughout this assessment.

National Planning Practice Guidance

The National Planning Practice Guidance⁴ (NPPG) web-based resource was launched by the Department for Communities and Local Government on 6th March 2014 and updated on 1st November 2019 to support the NPPF and make it more accessible. The air quality pages are summarised under the following headings:

1. What air quality considerations does planning need to address?
2. What is the role of plan-making about air quality?
3. Are air quality concerns relevant to neighbourhood planning?
4. What information is available about air quality?
5. When could air quality considerations be relevant to the development management process?
6. What specific issues may need to be considered when assessing air quality impacts?
7. How detailed does an air quality assessment need to be?
8. How can an impact on air quality be mitigated?

These were reviewed and the relevant guidance considered as necessary throughout the undertaking of this assessment.

Local Planning Policy

The Local Plan for the Havant Borough Council (HBC) is Havant Borough Local Plan⁵. The current adopted local plan, known as the Havant Borough Local Development Framework (HBLDF) aims to guide future developments in the borough up to 2026. The HBLDF is made up of a collection of planning documents and the Core Strategy is the principal document setting out the broad detail and direction of development in the borough. Having reviewed the Core Strategy, there are no air quality relevant policies.

⁴ <https://www.gov.uk/guidance/air-quality--3>.

⁵ Havant Borough Council, Local Plan 2011.

However, there is a one on pollution:

“DM10 Pollution

Development that may cause pollution of water, air or soil or pollution through noise, smell, smoke, fumes, gases, steam, dust, vibration, light, heat, electromagnetic radiation, and other pollutants will only be permitted where all of the following relevant criteria can be met:

[...]

2. National air quality standards or objectives would not be breached.”

The new Havant Borough Local Plan was submitted for examination to the Secretary of State for Housing Communities and Local Government on 12th February 2021. The following policy is relevant:

“E23: Air Quality

Offsetting emissions

- a) Major development proposals will be expected to provide mitigation measures which offset emissions and are proportionate to the scale and nature of the development*

Threshold based assessment

In addition to a., development proposals of 150 or more (gross) residential units, 1,000 sqm or more of commercial floorspace, or which are likely to materially alter the traffic flow on the local highway network will be permitted where:

- a) Projected levels of air pollution or emissions associated with the development would not result in a significant deterioration of current air quality at a location where national Air Quality Objectives or limit values apply; or*
- b) Measures are provided which demonstrably mitigate the impact on air quality to an acceptable level.”*

The implications of this policy were taken into consideration throughout the undertaking of the assessment.

3. Baseline

Existing air quality conditions in the vicinity of the proposed development site were found in order to provide a baseline for the assessment. These are detailed in the following Sections.

Local Air Quality Management

As required by the Environment Act (1995), HBC has undertaken Review and Assessment of air quality within their area of jurisdiction. This process has indicated that annual mean concentrations of NO₂ are above the AQO within the borough. As such, no AQMA's have been declared.

The development is not located within the AQMA. As such, there is the potential for vehicles travelling to and from the site to increase pollution levels in this sensitive area, as well as the exposure of future residents to poor air quality. These issues have been considered throughout the assessment.

HBC has concluded that concentrations of all other pollutants considered within the AQS are currently below the relevant AQOs. As such, no further AQMAs have been designated.

Air Quality Monitoring

Monitoring of pollutant concentrations is undertaken by HBC throughout their area of jurisdiction. Annual mean NO₂ results recorded in the vicinity of the development taken from readily available information online are shown in Table 3. Exceedances of the relevant AQOs are shown in **bold**. Reference should be made to Figure 1 for a graphical representation.

Table 3: Monitoring Results - NO₂

Monitoring Site	Distance to Site (Km)	Monitor Type	Data Capture (a) (%)	Monitored NO ₂ Concentration (µg/m ³)		
				2016	2017	2018
Ramblers Way (A)	0.66	Diffusion Tube – Suburban	100	22.94	20.13	21.36
Front Lawn Junior, Broadmere Avenue (B)	1.61	Diffusion Tube – Urban Background	83.30	14.71	14.05	n/a
Dunsbury Way (C)	1.27	Diffusion Tube – Urban Centre	16.60	n/a	n/a	22.47
Barncroft (Car Park) (D)	1.92	Diffusion Tube – Other	16.60	n/a	n/a	31.62
Barncroft (Woodland) (E)	1.80	Diffusion Tube – Other	16.60	n/a	n/a	19.58

Monitoring Site	Distance to Site (Km)	Monitor Type	Data Capture (a) (%)	Monitored NO ₂ Concentration (µg/m ³)		
				2016	2017	2018
Stakes Road (F)	3.00	Diffusion Tube – Roadside	83.30	24.44	24.12	26.82
St. Peters Primary School (G)	2.00	Diffusion Tube – Other	16.60	n/a	n/a	21.58
Waterlooville Precinct (H)	2.31	Diffusion Tube – Urban Background	100.00	20.67	19.95	20.56
London Road (Waterlooville) (I)	2.21	Diffusion Tube – Other	83.30	39.71	39.86	n/a

As shown in Table 3, annual mean NO₂ concentrations were below the relevant AQO at the nearest monitors to the development in recent years. Despite many of the sites only having 16.60% data capture for the latest year, they are like the other locations, therefore one can assume they will not exceed the relevant AQO.

Monitoring of PM₁₀ concentrations is not undertaken within the vicinity of the proposed development.

Background Pollutant Concentrations

Predictions of background pollutant concentrations on a 1km by 1km grid basis have been produced by DEFRA for the entire of the UK to assist LAs in their Review and Assessment of air quality. The proposed development site is in grid square NGR: 470500, 109500. Data for this location was downloaded from the DEFRA website⁶ for the purpose of this assessment and is summarised in Table 4.

Table 4: Background Pollutant Concentrations

Pollutant	Predicted Background Concentration (µg/m ³)		
	2018	2022	2026
NO ₂	13.45	11.59	10.12
PM ₁₀	15.01	14.17	13.67

As shown in Table 4, predicted background NO₂ and PM₁₀ concentrations are below the relevant AQOs at the development site and predicted to decrease in future years.

⁶ <http://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018>.

Sensitive Receptors

A sensitive receptor is defined as any location which may be affected by changes in air quality because of a development. These have been defined for dust and road vehicle exhaust emission impacts in the following Sections.

4. Methodology

Introduction

The proposed development has the potential to cause air quality impacts during the construction and operational phases, as well as expose future occupants to elevated pollution levels. These factors were assessed in accordance with the following methodology.

Construction Phase Fugitive Dust Emissions

There is the potential for fugitive dust emissions to occur because of construction phase activities. These have been assessed in accordance with the methodology outlined within the Institute of Air Quality Management (IAQM) document 'Guidance on the Assessment of Dust from Demolition and Construction V1.1'⁷

Activities on the proposed construction site have been divided into 3 types to reflect their different potential impacts. These are:

- Earthworks;
- Construction; and,
- Trackout.

The potential for dust emissions was assessed for each activity that is likely to take place and considered 3 separate dust effects:

- Annoyance due to dust soiling;
- Harm to ecological receptors; and
- The risk of health effects due to a significant increase in exposure to PM₁₀.

The assessment steps are detailed below.

Step 1

Step 1 screens the requirement for a more detailed assessment. Should human receptors be identified within 350m of the boundary or 50m from the construction vehicle route up to 500m from the site entrance, then the assessment proceeds to Step 2. Additionally, should ecological receptors be identified within 50m of the site or the construction vehicle route, then the assessment also proceeds to Step 2.

Should sensitive receptors not be present within the relevant distances then **negligible** impacts would be expected and further assessment is not necessary.

Step 2

Step 2 assesses the risk of potential dust impacts. A site is allocated a risk category based on 2 factors:

- The scale and nature of the works, which determines the magnitude of dust arising as: small, medium or large (Step 2A); and,

⁷ Guidance on the Assessment of Dust from Demolition and Construction V1.1, IAWM, 2016

- The sensitivity of the area to dust impacts, which can be defined as low, medium, or high sensitivity (Step 2B).

The 2 factors are combined in Step 2C to determine the risk of dust impacts without mitigation applied.

Step 2A defines the potential magnitude of dust emission through the construction phase. The relevant criteria are summarised in Table 5.

Table 5 : Construction Dust - Magnitude of Emission

Magnitude	Activity	Criteria
Large	Earthworks	Total site area greater than 10,000m ² Potentially dusty soil type (e.g., clay, which will be prone to suspension when dry due to small particle size) More than 10 heavy earth moving vehicles active at any one time Formation of bunds greater than 8m in height More than 100,000 tonnes of material moved
	Construction	Total building volume greater than 100,000m ³ On site concrete batching Sandblasting
	Trackout	More than 50 Heavy-Duty Vehicle (HDV) trips per day Potentially dusty surface material (e.g., high clay content) Unpaved road length greater than 100m
Medium	Earthworks	Total site area 2,500m ² to 10,000m ² Moderately dusty soil type (e.g., silt) 5 to 10 heavy earth moving vehicles active at any one time Formation of bunds 4m to 8m in height Total material moved 20,000 tonnes to 100,000 tonnes
	Construction	Total building volume 25,000m ³ to 100,000m ³ Potentially dusty construction material (e.g., concrete) On site concrete batching
	Trackout	10 to 50 HDV trips per day Moderately dusty surface material (e.g., high clay content) Unpaved road length 50m to 100m

Magnitude	Activity	Criteria
Small	Earthworks	Total site area less than 2,500m ² Soil type with large grain size (e.g., sand) Less than 5 heavy earth moving vehicles active at any one time Formation of bunds less than 4m in height Total material moved less than 20,000 tonnes Earthworks during wetter months
	Construction	Total building volume less than 25,000m ³ Construction material with low potential for dust release (e.g., metal cladding or timber)
	Trackout	Less than 10 HDV trips per day Surface material with low potential for dust release Unpaved road length less than 50m

Step 2B defines the sensitivity of the area around the development to potential dust impacts. The influencing factors are shown in Table 6.

Table 6: Construction Dust - Examples of Factors Defining Sensitivity of an Area

Receptor Sensitivity	Examples	
	Human Receptors	Ecological Receptors
High	Users expect of high levels of amenity High aesthetic or value property People expected to be present continuously for extended periods of time Locations where members of the public are exposed over a period relevant to the AQO for PM ₁₀ . e.g., residential properties, hospitals, schools, and residential care homes	Internationally or nationally designated site e.g., Special Area of Conservation
Medium	Users would expect to enjoy a reasonable level of amenity Aesthetics or value of their property could be diminished by soiling People or property wouldn't be expected to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land e.g., parks and places of work	Nationally designated site e.g., Sites of Special Scientific Interest

Receptor Sensitivity	Examples	
	Human Receptors	Ecological Receptors
Low	Enjoyment of amenity would not be expected Property would not be expected to be diminished in appearance Transient exposure, where people would only be expected to be present for limited periods. e.g., public footpaths, playing fields, shopping streets, farmland, short term car parks and roads	Locally designated site e.g., Local Nature Reserve

The guidance also provides the following factors to consider when determining the sensitivity of an area to potential dust impacts:

- Any history of dust generating activities in the area;
- The likelihood of concurrent dust generating activity on nearby sites;
- Any pre-existing screening between the source and receptors;
- Any conclusions drawn from analysing local meteorological data which accurately represent the area; and if relevant the season during which works will take place;
- Any conclusions drawn from local topography;
- Duration of the potential impact, as a receptor may become more sensitive over time; and,
- Any known specific receptor sensitivities which go beyond the classifications given in the document.

These factors were considered during the undertaking of the assessment.

The criteria for determining the sensitivity of the area to dust soiling effects on people and property is summarised in Table 7.

Table 7: Construction Dust - Sensitivity of the Area to Dust Soiling Effects on People and Property

Receptor Sensitivity	Number of Receptors	Distance from the Source (m)			
		Less than 20	Less than 50	Less than 100	Less than 350
High	More than 100	High	High	Medium	Low
	10 - 100	High	Medium	Low	Low
	1 - 10	Medium	Low	Low	Low
Medium	More than 1	Medium	Low	Low	Low
Low	More than 1	Low	Low	Low	Low

Table 8 outlines the criteria for determining the sensitivity of the area to human health impacts.

Table 8: Construction Dust - Sensitivity of the Area to Human Health Impacts

Receptor Sensitivity	Annual Mean PM ₁₀ Concentration	Number of Receptors	Distance from the Source (m)				
			Less than 20	Less than 50	Less than 100	Less than 200	Less than 350
High	Greater than 32µg/m ³	More than 100	High	High	High	Medium	Low
		10 - 100	High	High	Medium	Low	Low
		1 - 10	High	Medium	Low	Low	Low
	28 - 32µg/m ³	More than 100	High	High	Medium	Low	Low
		10 - 100	High	Medium	Low	Low	Low
		1 - 10	High	Medium	Low	Low	Low
	24 - 28µg/m ³	More than 100	High	Medium	Low	Low	Low
		10 - 100	High	Medium	Low	Low	Low
		1 - 10	Medium	Low	Low	Low	Low
	Less than 24µg/m ³	More than 100	Medium	Low	Low	Low	Low
		10 - 100	Low	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low	Low
Medium	-	More than 10	High	Medium	Low	Low	Low
		1 - 10	Medium	Low	Low	Low	Low
Low	-	More than 1	Low	Low	Low	Low	Low

Table 9 outlines the criteria for determining the sensitivity of the area to ecological impacts.

Table 9: Construction Dust - Sensitivity of the Area to Ecological Impacts

Receptor Sensitivity	Distance from the Source (m)	
	Less than 20	Less than 50
High	High	Medium
Medium	Medium	Low
Low	Low	Low

Step 2C combines the dust emission magnitude with the sensitivity of the area to determine the risk of unmitigated impacts. Table 10 outlines the risk category from earthworks and construction activities.

Table 10: Construction Dust - Dust Risk Category from Earthworks and Construction Activities

Receptor Sensitivity	Dust Emission Magnitude		
	Large	Medium	Small
High	High	Medium	Low
Medium	Medium	Medium	Low
Low	Low	Low	Negligible

Table 11 outlines the risk category from trackout activities.

Table 11: Construction Dust - Dust Risk Category from Trackout Activities

Receptor Sensitivity	Dust Emission Magnitude		
	Large	Medium	Small
High	High	Medium	Low
Medium	Medium	Low	Negligible
Low	Low	Low	Negligible

Step 3

Step 3 requires the identification of site specific mitigation measures within the IAQM guidance⁸ to reduce potential dust impacts based upon the relevant risk categories identified in Step 2. For sites with **negligible** risk, mitigation measures beyond those required by legislation are not required. However, additional controls may be applied as part of good practice.

Step 4

Once the risk of dust impacts has been determined and the appropriate mitigation measures identified, the final step is to determine the significance of any residual impacts. For all construction activity, the aim should be to control effects using effective mitigation. Experience shows that this is normally possible. Hence the residual effect will normally be **not significant**.

Operation Phase Road Vehicle Exhaust Emission Assessment

The proposed development has the potential to affect existing air quality because of road traffic exhaust emissions associated with vehicles travelling to and from the site, as well as expose future occupants to elevated pollution levels.

⁸ Guidance on the Assessment of Dust from Demolition and Construction V1.1, IAQM, 2016.

Potential Development Impacts

The development proposals have been screened against the IAQM indicative criteria for requiring an air quality assessment.

1. A change in Light-Duty Vehicle⁹ (LDV) traffic flows on local roads with relevant receptors
 - more than 100 Annual Average Daily Traffic (AADT) within or adjacent to an AQMA
 - more than 500 AADT elsewhere
2. A change in HDV¹⁰ flows on local roads with relevant receptors
 - more than 25 AADT within or adjacent to an AQMA
 - more than 100 AADT elsewhere
3. A change in the alignment of roads by 5m or more and the road is within an AQMA
4. Introduction of a new junction or remove an existing junction near to relevant receptors
 - Applies to junctions that cause traffic to significantly change vehicle accelerate/decelerate, e.g., traffic lights, or roundabouts.
5. Introduce or change a bus station
 - Where bus flows will change by:
 - (a) more than 25 AADT within or adjacent to an AQMA
 - (b) more than 100 AADT elsewhere
6. Has an underground car park with an extraction system within 20 m of a relevant receptor. Coupled with the car park having more than 100 movements per day (total in and out).
7. Has one or more substantial combustion processes, where there is a risk of impacts at relevant receptors.
 - includes combustion plant associated with standby emergency generators (typically associated with centralised energy centers) and shipping.

Where IAQM indicative criteria for requiring an air quality assessment was met, potential impacts were defined by predicting pollutant concentrations at sensitive locations using Design Manual for Roads and Bridges (DMRB)¹¹ and/or ADMS-Roads dispersion modelling.

Where necessary, locations sensitive to potential changes in pollutant concentrations were identified within 200m of the highway network following the guidance provided within DMRB on the likely limits of pollutant dispersion from road sources. The criteria provided within DEFRA guidance¹² on where the AQOs apply, as summarised in Table 2, was used to determine appropriate receptor positions.

Reference should be made to the Appendix for assessment input data and details of the verification process.

⁹ Cars and small vans <3.5t gross vehicle weight

¹⁰ Goods vehicles + buses >3.5t gross vehicle weight

¹¹ DMRB Volume 11, Section 3, Part 1, LA 105, Highways England, 2019.

¹² Local Air Quality Management Technical Guidance (TG16), DEFRA, 2018.

Impact Significance

The significance of predicted air quality impacts was determined following the guidance provided within the IAQM document 'Land-Use Planning & Development Control: Planning for Air Quality'¹³. Using this methodology impacts were defined based on the interaction between the predicted pollutant concentration in the Do Something (DS) or With Development scenario and the magnitude of change between the Do Minimum (DM) or Without Development and DS scenarios, as outlined in Table 12.

Table 12: Significance of Road Vehicle Exhaust Emissions Impact

Concentration at Receptor in Assessment Year	Predicted Concentration Change as a Proportion of AQO (%)			
	1	2 - 5	6 - 10	> 10
75% or less of AQO	Negligible	Negligible	Slight	Moderate
76 - 94% of AQO	Negligible	Slight	Moderate	Moderate
95 - 102% of AQO	Slight	Moderate	Moderate	Substantial
103 - 109% of AQO	Moderate	Moderate	Substantial	Substantial
110% or more of AQO	Moderate	Substantial	Substantial	Substantial

The matrix shown in Table 12 is intended to be used by rounding the change in percentage pollutant concentration to whole numbers, which makes it clearer which cell the impact falls within. It should be noted that changes of 0%, i.e., less than 0.5%, are described as **negligible**.

Following the prediction of impacts at discrete receptor locations, the IAQM document¹⁴ provides guidance on determining the overall air quality impact significance of the operation of a development. The following factors are identified for consideration by the assessor:

- The existing and future air quality in the absence of the development;
- The extent of current and future population exposure to the impacts; and,
- The influence and validity of any assumptions adopted when undertaking the prediction of impacts.

The IAQM guidance states that an assessment must conclude the significance of the predicted impact. It should be noted that this is a binary judgement of either it is **significant**, or it is **not significant**.

The determination of significance relies on professional judgement, and reasoning should be provided as far as practicable. This has been considered throughout the assessment when defining predicted impacts. The IAQM guidance¹⁵ suggests the provision of details of the assessor's qualifications and experience. These can be provided upon request.

¹³ Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

¹⁴ Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

¹⁵ Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

Future Exposure

The proposal has the potential to expose future occupants to poor air quality. To assess pollutant concentrations across the development site, consideration was made of the proximity of the site to major roads and background pollution concentrations.

Pollution concentrations at the development site were compared against the relevant AQOs to determine the potential for exposure of future occupants to elevated pollutant concentrations and identify any appropriate mitigation, if necessary.

5. Assessment

Construction Phase Fugitive Dust Emissions

Step 1

The undertaking of activities such as excavation, ground works, cutting, construction, concrete batching and storage of materials has the potential to result in fugitive dust emissions throughout the construction phase. Vehicle movements both on site and on the local road network also have the potential to result in the re-suspension of dust from highway surfaces.

The potential for impacts at sensitive locations depends significantly on local meteorology during the undertaking of dust generating activities, with the most significant effects likely to occur during dry and windy conditions.

Receptors sensitive to potential dust impacts during earthworks and construction were identified from a desk top study of the area up to 350m from the development boundary. These are summarised in Table 13.

Table 13: Earthworks and Construction Dust Sensitive Receptors

Distance from Site Boundary (m)	Approximate Number of Human Receptors	Approximate Number of Ecological Receptors
Less than 20	1-10	0
Less than 50	1-10	0
Less than 100	1-10	0
Less than 350	More than 100	0

Receptors sensitive to potential dust impacts from trackout were identified from a desk top study of the area up to 50m from the road network within 500m of the site access. These are summarised in Table 14.

Table 14: Trackout Dust Sensitive Receptors

Distance from Site Access Route (m)	Approximate Number of Human Receptors	Approximate Number of Ecological Receptors
Less than 20	1-10	0
Less than 50	1-10	0

There are no ecological receptors within 50m of the development boundary or the access route within 500m of the site entrance. As such, ecological impacts have not been assessed further within this report.

A number of additional factors have been considered when determining the sensitivity of the surrounding area. These are summarised in Table 15.

Table 15: Additional Area Sensitivity Factors to Potential Dust Impacts

Guidance	Comment
Whether there is any history of dust generating activities in the area	The desk top study did not indicate any dust generating activities in the local area
The likelihood of concurrent dust generating activity on nearby sites	A review of the planning portal did not indicate any additional development proposals likely to result in concurrent dust generation in the vicinity of the site
Pre-existing screening between the source and the receptors	There is no pre-existing screening between the site and surrounding receptors
Conclusions drawn from local topography	There are no significant topographical constraints to dust dispersion
Duration of the potential impact, as a receptor may become more sensitive over time	Currently it is unclear as to the duration of the construction phase. However, it is possible that it will extend over one year
Any known specific receptor sensitivities which go beyond the classifications given in the document	No specific receptor sensitivities identified during the baseline assessment

Based on the criteria shown in Figure 16, the sensitivity of the receiving environment to potential dust impacts was determined as **low**. This is because there is only transient exposure, where people would only be expected to be present for limited periods. It should be noted that all receptors were assumed to be of **high** sensitivity to provide a robust assessment.

The sensitivity of the receiving environment to specific potential dust impacts, based on the criteria shown in Section 4, is shown in Table 16.

Table 16: Sensitivity of the Surrounding Area to Potential Dust Impacts

Potential Impact	Sensitivity of the Surrounding Area		
	Earthworks	Construction	Trackout
Dust Soiling	Low	Low	Low
Human Health	Low	Low	Low

The potential risk of dust impacts at the identified receptors is considered in the following Sections.

Step 1

The undertaking of activities such as ground works, cutting, construction, concrete batching and storage of materials has the potential to result in fugitive dust emissions throughout the construction phase. Vehicle movements both on site and on the local road network also have the potential to result in the re-suspension of dust from haul roads and highway surfaces.

The potential for impacts at sensitive locations depends significantly on local meteorology during the undertaking of dust generating activities, with the most significant effects likely to occur during dry and windy conditions.

The desk-study undertaken to inform the baseline identified a number of sensitive receptors within 350m of the site boundary. As such, a detailed assessment of potential dust impacts was required.

Step 2

Earthworks

Table 17 show the evaluation of the potential magnitude of impacts from earthworks.

Table 17: Earthworks Impact Magnitude

Category	Criteria	Evaluation
Large	Total site area greater than 10,000m ²	No
	Potentially dusty soil type (e.g., clay, which will be prone to suspension when dry due to small particle size)	Yes
	More than 10 heavy earth moving vehicles active at any one time	No
	Formation of bunds greater than 8m in height	No
	More than 100,000 tonnes of material moved	No
Medium	Total site area 2,500m ² to 10,000m ²	No
	Moderately dusty soil type (e.g., silt)	Yes
	5 to 10 heavy earth moving vehicles active at any one time	Yes
	Formation of bunds 4m to 8m in height	No
	Total material moved 20,000 tonnes to 100,000 tonnes	No
Small	Total site area less than 2,500m ²	Yes
	Soil type with large grain size (e.g., sand)	Yes
	Less than 5 heavy earth moving vehicles active at any one time	Yes
	Formation of bunds less than 4m in height	Yes
	Total material moved less than 20,000 tonnes	Yes
	Earthworks during wetter months	No

Earthworks will primarily involve excavating material, haulage, tipping and stockpiling, as well as site levelling and landscaping. The total site area is ~1,200m²; thus, the potential magnitude of construction impacts from earthworks is estimated to be **large**.

Table 17 indicates the sensitivity of the area to dust soiling effects on people and property is **low**. In accordance with the criteria outlined in Table 11, the development is considered to be a **low** risk site for dust soiling as a result of earthworks.

Table 17 indicates the sensitivity of the area to human health impacts is **low**. In accordance with the criteria outlined in Table 11, the development is considered to be a **low** risk site for human health impacts as a result of earthworks.

Construction

Table 18 show the evaluation of the potential magnitude of impacts from construction activities.

Table 18: Construction Impact Magnitude

Category	Criteria	Evaluation
Large	Total building volume greater than 100,000m ³	No
	On site concrete batching	Yes
	Sandblasting	No
Medium	Total building volume 25,000m ³ to 100,000m ³	No
	Potentially dusty construction material (e.g., concrete)	Yes
	On site concrete batching	Yes
Small	Total building volume less than 25,000m ³	Yes
	Construction material with low potential for dust release (e.g., metal cladding or timber)	Yes

The potential magnitude of impacts from construction activities is estimated to be **large**. The total building volume to be developed is likely to be less than 25,000m³ but there will be on site concrete batching.

Table 18 indicates the sensitivity of the area to dust soiling effects on people and property is **low**. In accordance with the criteria outlined in Table 11, the development is considered to be a **low** risk site for dust soiling as a result of construction activities.

Table 18 indicates the sensitivity of the area to human health impacts is **low**. In accordance with the criteria outlined in Table 11, the development is considered to be a **low** risk site for human health impacts as a result of construction activities.

Trackout

Table 19 show the evaluation of the potential magnitude of impacts from trackout.

Table 19: Trackout Impact Magnitude

Category	Criteria	Evaluation
Large	More than 50 HDV trips per day	No
	Potentially dusty surface material (e.g., high clay content)	No
	Unpaved road length greater than 100m	Yes
Medium	10 to 50 HDV trips per day	Yes
	Moderately dusty surface material (e.g., high clay content)	Yes

Category	Criteria	Evaluation
	Unpaved road length 50m to 100m	No
Small	Less than 10 HDV trips per day	Yes
	Surface material with low potential for dust release	Yes
	Unpaved road length less than 50m	Yes

The potential magnitude of impacts from trackout is estimated to be **large**, as it is anticipated that there will be more than 10 HDV trips per day, and unpaved road length is expected to be greater than 100m.

Table 19 indicates the sensitivity of the area to dust soiling effects on people and property is **low**. In accordance with the criteria outlined in Table 12, the development is considered to be a **low** risk site for dust soiling as a result of trackout activities.

Table 19 indicates the sensitivity of the area to human health impacts is **low**. In accordance with the criteria outlined in Table 12, the development is considered to be a **low** risk site for human health impacts as a result of trackout activities.

Summary of Potential Unmitigated Dust Risks

A summary of the risk from each dust generating activity is provided in Table 20.

Table 20: Summary of Potential Unmitigated Dust Risks

Potential Impact	Risk			
	Earthworks	Construction	Trackout	Overall
Dust Soiling	Low	Low	Low	Low
Human Health	Low	Low	Low	Low
Overall				Low

As indicated in Table 20, the potential risk of dust soiling and potential risk of human health impacts is **low** for all risks.

It should be noted that the potential for impacts depends significantly on the distance between the dust generating activity and receptor location. Risk was predicted based on a worst-case scenario of works being undertaken at the site boundary closest to each sensitive area. Therefore, actual risk is likely to be lower than that predicted during most of the construction phase.

Step 3

The IAQM guidance¹⁶ provides potential mitigation measures to reduce impacts as a result of fugitive dust emissions during the construction phase. These have been adapted for the development site as summarised in Table 21. These may be reviewed prior to the commencement of construction works

¹⁶ Guidance on the Assessment of Dust from Demolition and Construction V1.1, IAQM, 2016.

and incorporated into a Construction Environmental Management Plan or similar if required by the LA.

Table 21: Fugitive Dust Emission Mitigation Measures

Issue / Control Measure	Site Risk		
	Low	Medium	High
General			
Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.	-	Committed	
Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager	Committed		
Display the head or regional office contact information	Committed		
Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority. The level of detail will depend on the risk and should include as a minimum the highly recommended measures in this document. The desirable measures should be included as appropriate for the site. The DMP may include monitoring of dust deposition, dust flux, real-time PM ₁₀ continuous monitoring and/or visual inspections.	As required	Committed	
Site Management			
Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken.	Committed		
Make the complaints log available to the Local Authority when asked	Committed		
Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the logbook.	Committed		
Hold regular liaison meetings with other high risk construction sites within 500 m of the site boundary, to ensure plans are co-ordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the offsite transport/ deliveries which might be using the same strategic road network routes.	As required		Committed
Monitoring			
Undertake daily onsite and offsite inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the Local Authority when asked. This should include regular dust soiling checks of surfaces such as	As required		Committed

Issue / Control Measure	Site Risk		
	Low	Medium	High
street furniture, cars, and windowsills within 100 m of site boundary, with cleaning to be provided if necessary.			
Conduct regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the Local Authority when asked	Committed		
Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being conducted and during prolonged dry or windy conditions.	Committed		
Agree dust deposition, dust flux, or real-time PM10 continuous monitoring locations with the Local Authority. Where possible commence baseline monitoring at least 3 months before work commences on site or, if it a large site, before work on a phase commences. Further guidance is provided by IAQM on monitoring during earthworks, and construction.	As required	Committed	
Preparing And Maintaining The Site			
Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.	Committed		
Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site.	Committed		
Fully enclose site or specific operations where there is a high potential for dust production and the site is actives for an extensive period	As required	Committed	
Avoid site runoff of water or mud.	Committed		
Keep site fencing, barriers and scaffolding clean using wet methods.	As required	Committed	
Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on site cover as described below	As required	Committed	
Cover, seed, or fence stockpiles to prevent wind whipping	As required	Committed	
Operating Vehicle/Machinery And Sustainable Travel			
Ensure all vehicles switch off engines when stationary - no idling vehicles.	Committed		
Avoid the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where practicable	Committed		

Issue / Control Measure	Site Risk		
	Low	Medium	High
Impose and signpost a maximum-speed-limit of 15 mph on surfaced and 10 mph on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the Local Authority, where appropriate)	As required		Committed
Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.	-	Committed	
Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing)	-	As required	Committed
Operations			
Only use cutting, grinding, or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g., suitable local exhaust ventilation systems	Committed		
Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate	Committed		
Use enclosed chutes and conveyors and covered skips.	Committed		
Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.	Committed		
Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.	As required	Committed	
Waste Management			
Avoid bonfires and burning of waste materials	Committed		
Measures Specific To Earthworks			
Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.	-	As required	Committed
Use Hessian, mulches or tackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable.	-	As required	Committed
Only remove the cover in small areas during work and not all at once.	-	As required	Committed
Measures Specific To Construction			

Issue / Control Measure	Site Risk		
	Low	Medium	High
Avoid scabbling (roughening of concrete surfaces) if possible.	As required		Committed
Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.	As required	Committed	
Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.	-	As required	Committed
For smaller supplies of fine power materials ensure bags are sealed after use and stored appropriately to prevent dust.	-	As required	
Measures Specific To Trackout			
Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.	As required	Committed	
Avoid dry sweeping of large areas.	As required	Committed	
Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.	As required	Committed	
Inspect on site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.	-	Committed	
Record all inspections of haul routes and any subsequent action in a site logbook.	As required	Committed	
Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.	-	Committed	
Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).	As required	Committed	
Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.	-	Committed	
Access gates to be located at least 10 m from receptors where possible.	-	Committed	

Step 4

Assuming the relevant mitigation measures outlined in Table 21 are implemented, the residual impacts from all dust generating activities are predicted to be **not significant**, in accordance with the IAQM guidance¹⁷.

Operational Phase Road Vehicle Exhaust Emission Assessment

Future Impacts

The development proposals have been screened out against the following IAQM indicative criteria for requiring an air quality assessment. The development site is not located within an AQMA. There is not expected to be a change of 500 in Light-Duty Vehicle¹⁸ (LDV) traffic flows on local roads with relevant receptors. There is not expected to be an increase of 100 HDV¹⁹ flows on local roads with relevant receptors. The roads are not located within an AQMA, therefore a change in alignment is not an issue. There are going to be no introduction of bus stations, nor changes to the current bus stations. There is not going to be underground car park with an extraction system within 20 m of a relevant receptor. Coupled with the car park having more than 100 movements per day (total in and out). There are no substantial combustion processes. Has one or more substantial combustion processes, where there is a risk of impacts at relevant receptors.

In accordance with the IAQM indicative criteria an air quality assessment of operation phase road traffic emissions is required, and impacts are considered **not significant**

Future Exposure

Following the guidance provided within the DMRB²⁰ locations sensitive to road traffic emissions within 200m of the highway network are likely to be within the limits of pollutant dispersion from road sources.

There are no major roads found within 200m of the development site. Therefore, air quality can be categorised using background concentrations, shown in Table 4.

¹⁷ Guidance on the Assessment of Dust from Demolition and Construction V1.1, IAQM, 2017.

¹⁸ Cars and small vans <3.5t gross vehicle weight

¹⁹ Goods vehicles + buses >3.5t gross vehicle weight

²⁰ DMRB Volume 11, Section 3, Part 1, LA 105, Highways England, 2019.

6. Conclusion

This report has been prepared to support the planning permission for residential development of about 150 dwellings.

The proposals have the potential to cause air quality impacts because of fugitive dust emissions during construction and road traffic exhaust emissions associated with vehicles travelling to and from the site during operation, as well as expose future occupants to any existing air quality issues. As such, an air quality assessment was required in order to determine baseline conditions and assess potential effects as a result of the scheme.

During the construction phase of the development there is the potential for air quality impacts because of fugitive dust emissions from the site. These were assessed in accordance with the IAQM methodology. Assuming good practice dust control measures are implemented, the residual significance of potential air quality impacts from dust generated by earthworks, construction and trackout was predicted to be **not significant**.

During the operational phase of the development there is the potential for air quality impacts because of traffic exhaust emissions associated with vehicles travelling to and from the site. These were assessed against the screening criteria provided within IAQM guidance. Due to the size and nature of the proposals, road vehicle exhaust emissions impacts were predicted to be not significant.

In accordance with the IAQM indicative criteria an air quality assessment of operation phase road traffic emissions is not required, and impacts are considered **not significant**.

The proposed development has the potential to expose future users to elevated pollution levels in the vicinity of the site during operation. Dispersion modelling was therefore undertaken using ADMS-Roads to predict pollutant concentrations because of emissions from the local highway network. Results were then verified using local monitoring data. Model results indicates that future users are unlikely to be exposed to pollutant concentrations that exceed AQOs.

Based on the assessment results, air quality factors are not considered a constraint to planning consent for the development.

7. Figures

Figure 1: Site Location and Surrounding Areas



