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Air Quality Constraints and Opportunities Appraisal

Bartons Road, Havant

Air Quality Constraints and Opportunities Appraisal

Project: BARTONS ROAD, HAVANT

Report reference: RP01-24394-R2

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1. EXECUTIVE SUMMARY

- 1.1 Cass Allen has been instructed by Stonebond Properties (Guildford) Limited to consider the potential air quality effects associated with a residential development at land south of Bartons Road in Havant. This appraisal was carried out with regard to relevant local and national planning policy and guidance.
- 1.2 The site is located to the north of Havant, which does not have any declared Air Quality Management Areas (AQMA), indicating air quality in the borough is generally acceptable.
- 1.3 Emissions of construction phase dust and particulate matter (PM: PM₁₀) were assessed in accordance with Institute of Air Quality Management (IAQM) guidance. A Medium Risk of dust soiling and Low Risk of PM₁₀ health effects have been identified, in the absence of mitigation. Suitable best practice mitigation measures have been recommended and no significant residual effects are expected.
- 1.4 No significant impacts on local air quality are anticipated as a result of changes in vehicle trips associated with the development, with no requirement for additional mitigation.
- 1.5 Accordingly, the overall effect of the development is considered 'not significant' with regard to air quality.
- 1.6 In summary, it is our view that the site is suitable for the development in terms of air quality and that there are no air quality constraints with respect to planning consent.

2. INTRODUCTION

- 2.1 Cass Allen has been instructed by Stonebond Properties (Guildford) Limited to consider the potential air quality effects associated with a residential development south of Bartons Road in Havant. This appraisal was carried out having regard to relevant local and national planning policy and guidance.
- 2.2 A previous planning application was submitted in August 2020 (ref: APP/20/00658), however, planning permission was refused on the grounds of density, form, scale and no affordable housing. This new application comprises 90 dwellings in line with the site allocation, reduced from the previous 175.
- 2.3 The Air Quality Assessment (AQA) within the original application for 175 units (Air Pollution Services, report reference: P1071_A_2, 9 February 2021) determined the impacts to be 'not significant', with no significant residual effects resulting from the construction and operation phases. Accordingly, future occupants would not be exposed to unacceptable air quality, and no further mitigation measures were deemed necessary. This updated assessment considers the new reduced scheme with regard current planning policy, guidance and baseline conditions.
- 2.4 The aims of the assessment were to consider potential air quality concerns resulting from:
- Dust and PM emissions generated by construction phase activities;
 - Exhaust emissions from construction plant and traffic;
 - The exposure of new sensitive receptors (i.e., anything that may be sensitive to changes in air quality) to elevated pollutant concentrations; and
 - Emissions from traffic generated by the operation of the development.
- 2.5 Subsequently, where required, appropriate measures have been identified to minimise the impacts.
- 2.6 This report contains technical terminology; a glossary of terms can be found at www.cassallen.co.uk/glossary.

3. PROJECT DESCRIPTION AND SITE CONTEXT

3.1 This report has been prepared to inform the following application:

Erection of 90 dwellings with associated landscaping, parking and improved access.

3.2 The site is allocated in the adopted Havant Borough Site Allocations Plan (2014) under ref. L145 for 90 dwellings. It lies to the north of Havant Borough, which does not have any declared AQMAs, indicating air quality in the borough is generally good. Vehicle emissions along the adjacent B2149 Petersfield Road have the greatest potential to influence pollutant concentrations at the site.

3.3 The site is currently vacant but is in the vicinity of numerous residential and commercial properties, which have the potential to be affected by construction phase dust/PM₁₀, and development-generated vehicle emissions. The residential receptors in the vicinity are considered at most risk to dust and emission impacts, specifically across Bartons Road where the site access will be located. The site location is shown in Figure 1.

Figure 1 Site Location and Surrounding Area



4. PLANNING POLICY

Air Quality Legislation

- 4.1 The wider air quality legislation underpinning national, regional and local planning policy, is summarised in Appendix 1.
- 4.2 The National AQOs and Air Quality Standards Regulations limit and target values for the UK are summarised in the Air Quality Strategy. These limits, for ten key air pollutants, are based on both European Union directives and World Health Organization (WHO) guidelines. They are periodically updated, informed by the latest scientific evidence to ensure continued effective protection of public health, vegetation and ecosystems. The Local Air Quality Management (LAQM) regime requires local authorities to regularly evaluate the air quality in their areas based on these AQOs.
- 4.3 As a regional pollutant, many sources of fine particulate matter (PM: PM_{2.5}) are beyond local authority control therefore, it does not form part of the LAQM regime. However, long-term (2040) targets for ambient PM_{2.5} concentrations are set in 'The Environmental Targets (Fine Particulate Matter) (England) Regulations' (2023) and an interim (2028) target is published in the 'Environmental Improvement Plan' (2023). PM_{2.5} is a key air pollutant for health impacts, and local authorities must monitor progress towards meeting these reduced levels.
- 4.4 The National AQOs for the pollutants most associated with vehicle emissions, and therefore applicable to this assessment, are detailed in Table 1.

Table 1 UK National Air Quality Objectives

Pollutant	Objective	Averaging Period
Nitrogen Dioxide (NO ₂)	40µg/m ³	Annual mean
	200µg/m ³ not to be exceeded more than 18 times per year	1-hour mean
Particulate Matter (PM ₁₀)	40µg/m ³	Annual mean
	50µg/m ³ not to be exceeded more than 35 times per year	24-hour mean
Particulate Matter (PM _{2.5})	20µg/m ³	Annual mean

- 4.5 The above AQOs are typically applied where there is 'relevant exposure', i.e., where members of the public are likely to be present for the relevant averaging periods, or regularly exposed, and not in workplaces where relevant provisions concerning health and safety at work apply.

National Policy

- 4.6 Outline guidance for the assessment of air quality affecting new developments is given in the National Planning Policy Framework (NPPF) (December 2024; as amended February 2025). Relevant sections in this case are highlighted below.

110. ...Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

187. Planning policies and decisions should contribute to and enhance the natural and local environment by ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of ...air pollution. Development should, wherever possible, help to improve local environmental conditions such as air ... quality.

198. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

199. 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. So 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.

201. The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.

Local Policy

- 4.7 Relevant Havant Borough Council (HBC) local planning policy is included in Appendix 1.
- 4.8 To address the requirements of the national and local policies, the following key air quality matters have been considered:
- Construction phase fugitive emissions of dust and PM impacts at existing receptors;
 - Construction phase plant and vehicle emissions impacts at existing receptors;
 - Operational phase vehicle emissions exposure at proposed receptors; and
 - Operational phase vehicle emissions impacts at existing receptors.

5. ASSESSMENT METHODOLOGY

- 5.1 The scope and methodology for this assessment has been determined with regard to:
- Defra 'Local Air Quality Technical Guidance' (2022) (TG22); and
 - EPUK & IAQM 'Land Use Planning & Development Control: Planning for Air Quality' (2017) (LUPDC).
- 5.2 Reference has also been made to other relevant technical guidance, where applicable.
- 5.3 Additionally, consultation was undertaken with the EHO at HBC Council (response via email, dated 30 May 2025), to inform the methodology and local assessment requirements. The correspondence has been included in Appendix 2.

Construction Phase

- 5.4 The assessment of potential air quality impacts during the construction phase has focused on the generation and dispersion of dust and PM₁₀, following the IAQM 'Guidance on the Assessment of Dust from Demolition and Construction' (January 2024) methodology, summarised as follows:
- Step 1 – screen the need for an assessment: consider impacts to sensitive human and ecological receptors within 250m or 50m of the site boundary (Figure 2), respectively and within 50m of routes used by construction vehicles up to 250m from the site entrance.
 - Step 2A – estimate the dust emission magnitude for each of the main construction activities – demolition, earthworks, general construction, and trackout.
 - Step 2B – determine the sensitivity of the receiving environment, through consideration of factors such as meteorological conditions, the number of nearby receptors, their proximity and their sensitivity. Other factors to consider are detailed in Box 9 of the guidance. A wind rose for Thorney Island weather station is included in Appendix 3.
 - Step 2C – define the risk of impacts.
 - Step 3 – identify site-specific mitigation requirements (in addition to basic project controls).
- 5.5 In addition, exhaust emissions from construction vehicles and plant may impact local air quality. The potential for significant effects resulting from these emissions has also been considered with reference to screening and significance criteria in LUPDC.
- 5.6 A review of the Multi-Agency Geographic Information for the Countryside (MAGIC) website did not identify any statutory designated ecological sites within the relevant screening distances, and therefore these have been excluded from the construction phase assessment.

Operational Phase

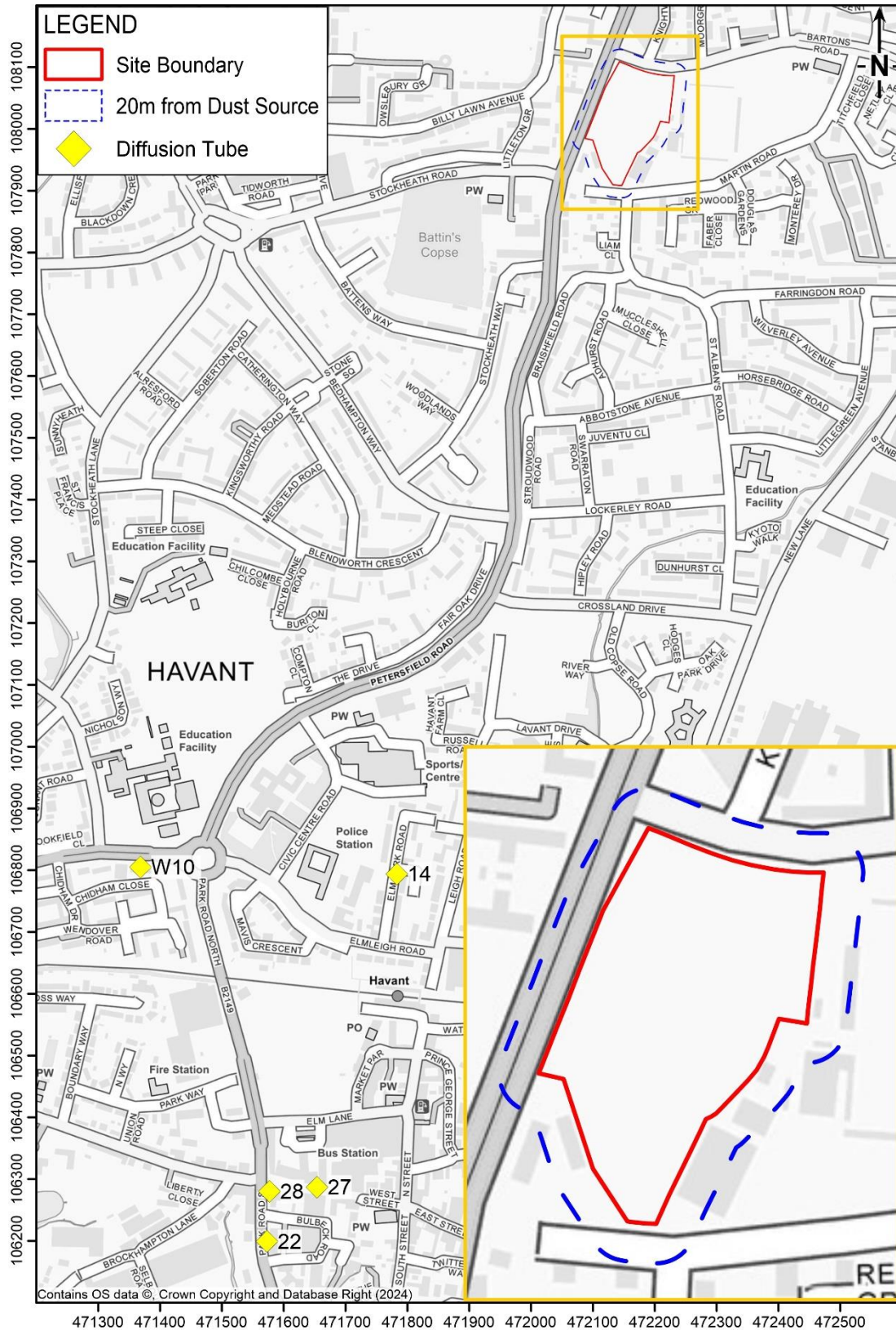
Air Quality Impacts

- 5.7 The LUPDC guidance indicates the magnitude of change in traffic flows that is potentially significant, and therefore likely to require further assessment, as follows:
- 5.8 For locations distant from an AQMA:
- Light Duty Vehicle (LDV) flows of >500 Annual Average Daily Traffic (AADT); and/or
 - Heavy Duty Vehicle (HDV) flows of >100 AADT.
- 5.9 The development has therefore been screened against these criteria. Where these criteria are not exceeded, a detailed assessment of air quality impacts is not normally required, and the resulting effect can normally be considered 'not significant'.

PM_{2.5} Targets

- 5.10 Additionally, Defra's 'PM_{2.5} Targets: Interim Planning Guidance' (October 2024), prompts developers to consider:
1. *How has exposure to PM_{2.5} been considered when selecting the development site?*
 2. *What actions and/or mitigations have been considered to reduce PM_{2.5} exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of PM_{2.5} and its precursors?*
- 5.11 Accordingly, these aspects are also considered in the operational phase assessment.

Figure 2 Study Area



6. BASELINE CONDITIONS

- 6.1 Air quality conditions in the vicinity of the site have been reviewed to provide a baseline for consideration. The collected data are included in the tables below and were obtained from Havant Borough Council (HBC) and Defra. Monitoring locations are indicated on Figure 2.

Table 2 Monitored Concentrations Across Study Area – NO₂

ID	Location	Type	Distance to site (km)	Annual Mean (µg/m ³)				
				2019	2020	2021	2022	2023
14	Elm Park Road	Suburban	1.15	17.9	15.8	15.9	14.7	13.7
22	Park Road South (Bulbeck Jctn)	Roadside	1.78	30.7	23.7	25.9	26.7	25.4
27	Havant Precinct	Urban	1.68	20.9	19.7	19.9	19.2	18.8
		Background						
28	Park Road South (West Street)	Roadside	1.70	33.4	25.1	28.6	28.9	28.0
W10	Compton Court (New Rd)	Roadside	1.33	26.7	21.4	24.8	23.8	21.2

Note: Data obtained from HBC 2024 Air Quality Annual Status Report (ASR), 2024. Results from 2020 and 2021 are likely to be atypical due to COVID-19 travel restrictions.

- 6.2 As indicated in Table 2 above, annual mean NO₂ concentrations at all monitoring locations were 'well below' (defined by the IAQM as <75% of the AQO) the relevant AQOs in the last four monitoring years (2020-2024). The general trend shows concentrations in the area reducing over time, and this is displayed in Figure A.3 of the ASR.

Table 3 2025 Mapped Background Annual Mean Concentrations – Study Area (µg/m³)

NO ₂	PM ₁₀	PM _{2.5}
10.5 - 14.3	11.6 - 12.6	7.0 - 7.8

Note: Data obtained from <https://uk-air.defra.gov.uk/data/laqm-background-home>. A range of values is provided as the study area covers multiple grid squares.

- 6.3 No monitoring of PM₁₀ or PM_{2.5} is undertaken in the vicinity of the site. However, Defra-predicted background annual mean concentrations across the study area for the current year, 2025, are well below the respective AQOs, as is the case for NO₂.

7. CONSTRUCTION PHASE ASSESSMENT

- 7.1 The IAQM methodology has been used to assess the potential impact of dust and PM₁₀ arising from on-site activities. As indicated within the guidance, the use of professional judgment is necessary, due to the diverse range of projects that are subject to dust impact assessment, meaning that it is not possible to be prescriptive as to how to assess the impacts.
- 7.2 As sensitive receptors were identified within the relevant IAQM screening distances, the assessment progressed to Step 2, which has been summarised in the tables below.

Table 4 Step 2A – Dust Emission Magnitude for Construction Activities

Activity	Magnitude	Explanation
Demolition	N/A	No demolition expected.
Earthworks	Small	Total site area <18,000m ² .
Construction	Medium	Total building volume to be constructed between 12,000-75,000m ³ .
Trackout	Large	Unpaved road length >100m.

Table 5 Step 2B – Sensitivity of the Area

Potential Impact	Details	Construction Activity		
		Earthworks	Construction	Trackout
Dust Soiling: Amenity	1-10 high sensitivity receptors within 20m.	Medium	Medium	Medium
PM ₁₀ : Health	As above; low background PM ₁₀ .	Low	Low	Low

Table 6 Step 2C – Summary of Impact Risks to Define Site-Specific Mitigation

Potential Impact	Construction Activity		
	Earthworks	Construction	Trackout
Dust Soiling	Low	Medium	Medium
Human Health	Negligible	Low	Low

- 7.3 Overall, the development is considered Medium Risk for dust soiling and Low Risk for PM₁₀ health effects, in the absence of mitigation. It should be noted that the prevailing winds (shown in Appendix 3) are westerly and thus, locations downwind of the site, to the east, are likely to be more at risk of construction dust impacts. Nonetheless, following implementation of the recommended mitigation measures for the relevant activities' risk levels in Appendix 4, it is anticipated that the residual effect of the construction phase will be not significant.
- 7.4 Regarding construction traffic, the construction phase flows are not expected to exceed the criteria detailed in paragraph 5.7 and therefore, significant residual effects are not anticipated.

8. OPERATIONAL PHASE APPRAISAL

Site Suitability

- 8.1 As detailed in Section 6, monitored annual mean NO₂ concentrations at the closest diffusions tubes to the site were below the AQO in the last five years, and well below in the last four. Baseline conditions have also improved since the previous AQA was undertaken. The greatest source of emissions at the site is the B2149 Petersfield Road, which runs along the site's western boundary. Diffusion tubes 22, 28, and W10, although distant, recorded annual mean NO₂ concentrations of 25.4µg/m³, 28.0µg/m³, 21.2µg/m³ respectively in 2023 and are located roadside to similarly trafficked roads.
- 8.2 It is therefore anticipated that annual mean concentrations at the site could be similar to these locations, and this is supported by the Defra background concentrations which were found to be well below the respective AQOs (Table 3) for all pollutants. Furthermore, with recently monitored annual mean NO₂ concentrations below 60µg/m³, a breach of the hourly mean AQO for NO₂ is unlikely (as indicated in TG22). Equally, exceedances of the 24-hour mean AQO for PM₁₀ are not anticipated, as Defra-predicted annual mean concentrations are below the 32µg/m³ proxy value.
- 8.3 Accordingly, the development is not expected to expose future occupants to unacceptable air quality and the site is considered suitable for the proposed residential use, with no requirement for additional mitigation.
- 8.4 In addition to the above, Defra guidance now requires consideration of how a development will reduce exposure to PM_{2.5}. In terms of selecting this development site, it is in an area where PM_{2.5} concentrations are expected to be well below the AQO, and the proposed dwellings will be set back from the nearest road, with no requirement to reduce exposure further.

Vehicle Emissions Impacts

- 8.5 As the proposal is for 90 units, there is the potential for the operational phase to generate flows in excess of the 500 AADT LDV LUPDC guidance screening threshold (detailed in paragraph 5.7). However, given the conclusions of the previous AQA for 175 units (report reference: P1071_A_2, 9 February 2021) were 'not significant', it is anticipated that the air quality impacts of this application will also be negligible, particularly given the gradual reduction in baseline pollutant concentrations and the adoption of cleaner-engined and electric vehicles. Therefore, the residual effect of the development's operational phase on existing sensitive receptors is also expected to be not significant, and further assessment of operational impacts is not required.
- 8.6 In addition to the above, Defra guidance now requires consideration of how a development will reduce emissions of PM_{2.5}. In terms of selecting this development site, there are numerous public transport opportunities in the vicinity, with multiple bus stops close to the site access. Based on the nature of the development and baseline air quality conditions in the vicinity of the site, no significant operational phase air quality impacts are anticipated, with no requirement for additional mitigation.

9. CONCLUSIONS

- 9.1 Cass Allen was instructed by Stonebond Properties (Guildford) Limited to consider the potential air quality effects associated with a residential development south of Bartons Road in Havant. This appraisal was carried out having regard to relevant local and national planning policy and guidance.
- 9.2 Emissions of construction phase dust and PM₁₀ were assessed in accordance with IAQM guidance. A Medium Risk of dust soiling and Low Risk PM₁₀ health effects have been identified, respectively, in the absence of mitigation. Suitable best practice mitigation measures have been recommended and no significant residual air quality impacts are expected.
- 9.3 No significant impacts on local air quality are anticipated as a result of changes in vehicle trips associated with the development, with no requirement for additional mitigation.
- 9.4 Accordingly, the overall effect of the development is considered 'not significant' with regard to air quality.
- 9.5 In summary, it is our view that the site is suitable for the development in terms of air quality and that there are no air quality constraints with respect to planning consent.

Appendix 1 Air Quality Legislation and Policy

Defra and the Devolved Administrations (2007) - The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (Volumes 1 and 2):

The Air Quality Strategy provides a framework for reducing air pollution in the UK, with the aim of meeting the requirements of European Union (EU) legislation. This has been brought into UK law via the EU (Withdrawal) Act 2018 (as amended) and is referred to as 'retained EU law'.

The air quality standards set within the Air Quality Strategy are recommended by the Expert Panel on Air Quality Standards (EPAQS) and the World Health Organisation (WHO), based on current scientific knowledge regarding the effects of each pollutant on health and the environment.

The AQOs are medium-term policy-based targets set by the government, taking into account economic efficiency, practicability, feasibility and timescales. Whilst some of the AQOs correspond with the EPAQS / WHO limits, others have a margin of tolerance, by specifying a number of permitted exceedances of the standard over a given period.

Many of the AQOs in the Air Quality Strategy have been made statutory in England via The Air Quality (England) Regulations, 2000, The Air Quality (England) Amendment Regulations, 2002 and The Air Quality Standards (Amendment) Regulations, 2016 – Statutory Instrument 2016 No. 1184.

Environmental Protection Act (1990):

Section 79 of the Environmental Protection Act 1990 defines statutory nuisance relevant to dust and particles as:

'Any dust, steam, smell or other effluvia arising from industrial, trade or business premises or smoke, fumes or gases emitted from premises so as to be prejudicial to health or a nuisance'; and

'Any accumulation or deposit which is prejudicial to health or a nuisance'.

Furthermore, Section 80 states that where a statutory nuisance is shown to exist, the Local Authority must serve an abatement notice. Failure to comply with an abatement notice is an offence and if necessary, the Local Authority may abate the nuisance and recover expenses. However, there are no statutory limit values for dust deposition above which 'nuisance' is deemed to exist and nuisance is a subjective concept, its perception being highly dependent upon the existing conditions and the change which has occurred.

Environment Act (2021):

The Act mandates that local authorities review and document local air quality within their jurisdiction by way of staged appraisals and respond accordingly, with the aim of meeting the AQOs defined in the Regulations. There is a requirement for local authorities to identify relevant sources of emissions that are likely to be responsible for any failure to achieve the AQOs, or to identify relevant sources within neighbouring authorities' areas. Where the objective(s) are not likely to be achieved within the relevant period(s), the authority is required to designate an AQMA. For each AQMA the Local Authority is required to draw up an Air Quality Action Plan (AQAP) to secure improvements in air quality, in order to work towards achieving air quality standards in the future.

Defra (2019) Clean Air Strategy:

The UK Government's Clean Air Strategy sets out the comprehensive actions required to improve air quality, required from all parts of government and society.

The primary focus of previous iterations of the Clean Air Strategy has been NO₂, and its principal source – road traffic. The 2019 Strategy broadens the focus into other areas, including actions on clean growth and pollutant emissions from other sources such as industry, agriculture, and domestic wood-burning stoves.

Local Planning Policy

The Havant Borough Core Strategy (2011) document sets out the current planning policy framework for the borough. The below policies are considered relevant to air quality:

DM10 Pollution

Development that may cause pollution of ... air ... pollution through ... smell, smoke, fumes, gases, steam, dust, ... and other pollutants will only be permitted where all of the following relevant criteria can be met:

- 1. The health and safety of existing and future users of the site, or nearby occupiers and residents is not put at risk.*
- 2. National air quality standards or objectives would not be breached.*

DM12 Mitigating the Impacts of Travel

New developments will be required to mitigate their travel impact, including the environmental impacts of travel (such as ... air ... pollution).

The Havant Borough Local Plan (Allocations) follows on from the adopted Havant Borough Core Strategy and includes the site itself. The following is considered relevant to this assessment:

Policy L145 SSE Offices Site, Bartons Road

Description of Site:

A brownfield site located in a prominent location on the corner of Petersfield Road and Bartons Road. It is currently occupied by a three-storey office building and associated car parking. The former occupiers of the offices have relocated elsewhere in Havant retaining part of the site for operational reasons in the short term.

Known Constraints:

...

- *Potential air quality ... issues due to proximity of Petersfield Road.*

Appendix 2 Correspondence with Local Authority

Email to HBC, dated 13 March 2025:

Good afternoon,

We have been appointed to undertake an Air Quality Assessment for a residential scheme targeting 90 units in Havant - please find an indicative Red Line attached for reference.

An outline planning application was submitted in 2020 for 175 units but was later refused in 2022 (Havant Borough ref: APP/20/00658). As such, we have been appointed to provide an update to the submitted AQA (Air Pollution Services, 2021) using current planning policy and guidance.

The previous AQA concluded that the impacts of the proposed development will be 'not significant'. As this application is proposing almost half the number of units, we are suggesting a high-level air quality appraisal.

Our appraisal would include:

- Risk-based qualitative construction phase assessment following the IAQM construction guidance (2024), focusing on dust and PM₁₀;*
- Qualitative operational phase assessment following the TG22 and EPUK & IAQM guidance;*
- Consideration of the new Defra 'PM_{2.5} Targets: Interim Planning Guidance' (November 2024); and*
- Details of relevant mitigation measures will be provided, where required.*

Please do let us know if you have any comments regarding the above or would like to discuss in greater detail.

Kind regards,

Danny

Response from Environmental Control Officer dated 30 May 2025:

Good Afternoon Danny,

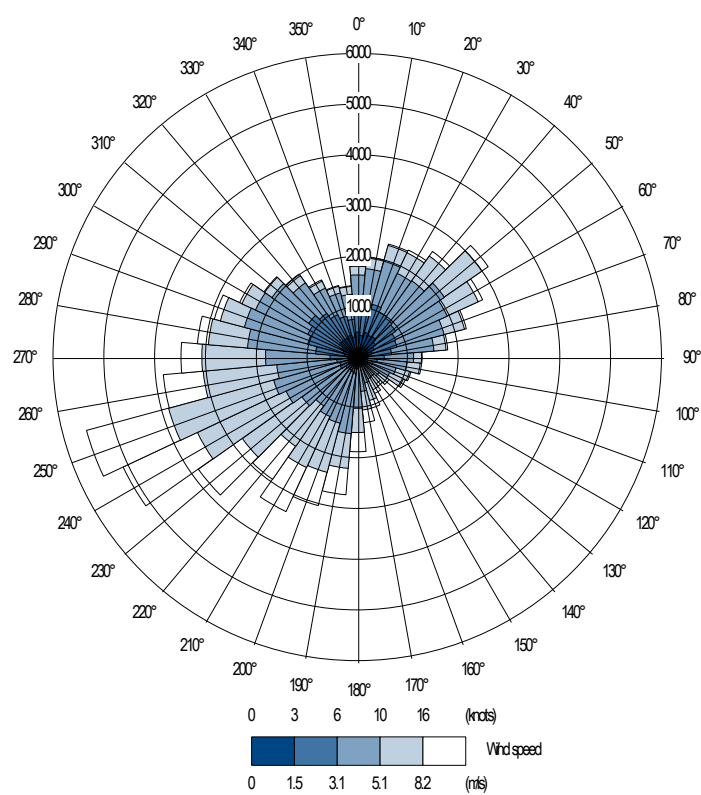
My apologies for the lack of response to your initial request. I am not clear on whether you have reviewed our prior comments on prior versions of this scheme. Please see attached. You will note that the conclusions of the initial assessment were accepted, noting that no absolute threshold was likely to be breached, nor any significant relative uplift to arise as a result of the development at any specific receptor. Comments therefore principally concerned the aspects of the development design which could be regarded to be 'air quality relevant'.

In so far as the air quality impact assessment – a high level assessment will be fine, I am more concerned about achieving a high quality proposal that contributes toward the PERT. I would draw your attention in particular to comments in the attached on the intent of the emerging policy E23 (still not having adopted status, but remaining intact in the latest draft of the local plan, so in principal still carrying some weight - whether directly or indirectly as the Council's interpretation of how the related NPPF objectives ought to be met). That policy is relevant to the provision of appliances in residential units (space/water heating, cooking, cooling & ventilation), the ease of sustainable travel choices (particularly by active modes, accommodation for EV's & charging for other modes of Electric personal transport), as well as landscaping & external detailing (e.g. green walls). I would advocate placing air quality & climate change at the heart of the development design as broad principles – it is not necessarily required to quantify the impact of individual design choices, but it is helpful to demonstrate that account has been taken of air quality within the design process.

Best Regards,

Jon

Appendix 3 Wind Rose for Thorney Island (2015-2024)



Appendix 4 Recommended Construction Phase Mitigation

Highly Recommended Mitigation Measures for Medium-Risk Sites

Communications

- Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.
- 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.
- Display the head or regional office contact information, where applicable.
- 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 Appendix. Further, 'desirable' measures from IAQM guidance should be included as appropriate for the site. The DMP may include monitoring of dust deposition, dust flux, real-time PM₁₀ continuous monitoring and/or visual inspections.

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.
- Make complaints log available to the Local Authority on request.
- Record any exceptional incidents that cause dust and/or air emissions, either on or off-site should be recorded, and the action taken to resolve the situation, in the logbook.

Monitoring

- Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the local authority when asked.
- 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 carried out and during prolonged dry or windy conditions.
- Agree dust deposition, dust flux, or real-time PM₁₀ continuous monitoring locations with the Local Authority. Where possible commence baseline monitoring at least three 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 demolition, earthworks and construction.

Preparing and Maintaining the Site

- Plan the site layout so that machinery and dust causing activities are located away from receptors, as far as is practicable.
- Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on-site.
- Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.
- Avoid site runoff of water or mud.
- Keep site fencing, barriers and scaffolding clean using wet methods.
- 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 reused on-site cover as described below.
- Cover, seed or fence stockpiles to prevent wind whipping.

Operating Vehicle/Machinery and Sustainable Travel

- Ensure all vehicle operators switch off engines when stationary – no idling vehicles.
- Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable.

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.
- Ensure an adequate water supply is available on the site for effective dust/PM suppression/mitigation, using non-potable water where possible and appropriate.
- Use enclosed chutes/conveyors and covered skips.
- Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.
- 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.

Waste Management

- Avoid bonfires and burning of waste materials.

Measures Specific to Construction (Medium Risk)

- 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 make sure that that appropriate additional control measures are in place.

Measures Specific to Trackout (Medium Risk)

- 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.
- Avoid dry sweeping of large areas.
- Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
- Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.
- Record all inspections of haul routes and any subsequent action in a site log book.
- Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.
- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).
- 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.
- Access gates to be located at least 10 m from receptors where possible.



Architectural & Environmental Consultants

Acoustics | Air Quality | Overheating

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