wardell-armstrong.com

ENERGY AND CLIMATE CHANGE
ENVIRONMENT AND SUSTAINABILITY
INFRASTRUCTURE AND UTILITIES
LAND AND PROPERTY
MINING AND MINERAL PROCESSING
MINERAL ESTATES
WASTE RESOURCE MANAGEMENT

MULBURY HOMES (CENTRAL) LIMITED

BENDIX STREET, MANCHESTER

AIR QUALITY ASSESSMENT

DECEMBER 2019

wardell armstrong

Wardell Armstrong
41-50 Futura Park, Aspinall Way, Middlebrook, Bolton, BL6 6SU
Telephone: +44 (0)1204 227 227 www.wardell-armstrong.com

DATE ISSUED:	**11th December 2019**
JOB NUMBER:	**GM10076**
REPORT NUMBER:	**001**
VERSION:	**V0.3**
STATUS:	**FINAL**

MULBURY HOMES (CENTRAL) LIMITED

BENDIX STREET, MANCHESTER

AIR QUALITY ASSESSMENT

DECEMBER 2019

PREPARED BY:

Philip Walton Environmental Scientist (Air Quality)

Matthew Barnes Senior Environmental Scientist (Air Quality)

APPROVED BY:

Malcolm Walton Technical Director

This report has been prepared by Wardell Armstrong LLP with all reasonable skill, care and diligence, within the terms of the Contract with the Client. The report is confidential to the Client and Wardell Armstrong LLP accepts no responsibility of whatever nature to third parties to whom this report may be made known.

No part of this document may be reproduced without the prior written approval of Wardell Armstrong LLP.

Wardell Armstrong is the trading name of Wardell Armstrong LLP, Registered in England No. OC307138.

Registered office: Sir Henry Doulton House, Forge Lane, Etruria, Stoke-on-Trent, ST1 5BD, United Kingdom

UK Offices: Stoke-on-Trent, Birmingham, Bolton, Cardiff, Carlisle, Edinburgh, Glasgow, Leeds, London, Manchester, Newcastle upon Tyne and Truro. International Offices: Almaty and Moscow

ENERGY AND CLIMATE CHANGE
ENVIRONMENT AND SUSTAINABILITY
INFRASTRUCTURE AND UTILITIES
LAND AND PROPERTY
MINING AND MINERAL PROCESSING
MINERAL ESTATES
WASTE RESOURCE MANAGEMENT

CONTENTS

EXECUTIVE SUMMARY 1
1 INTRODUCTION 2
1.1 Background 2
2 LEGISLATION AND POLICY CONTEXT 3
2.1 Relevant Air Quality Legislation and Guidance 3
2.2 Assessment Criteria 3
3 ASSESSMENT METHODOLOGY 5
3.1 Consultation and Scope of Assessment 5
3.2 Construction Phase Impacts 5
3.3 Operational Phase Assessment 6
3.4 Limitations and Uncertainties 8
4 BASELINE SITUATION 10
4.1 Manchester City Council Local Air Quality Management 10
4.2 Background Air Pollutant Concentrations 10
4.3 Modelled Baseline Concentration 11
5 IMPACT ASSESSMENT 12
5.1 Construction Phase 12
5.2 Operational Phase Impact Assessment 16
5.3 Operational Phase Sensitivity Analysis 17
6 CONCLUSIONS 19
6.1 Construction Phase 19
6.2 Operational Phase 19
6.3 Summary 19

APPENDICES

Appendix A: Air Quality Legislation and Guidance
Appendix B: Methodology for Construction Phase Assessment
Appendix C: Methodology for Operational Phase Assessment
Appendix D: Professional Experience of Assessors

DRAWINGS	TITLE	SCALE
GM10076-001	Proposed Sensitive Receptor Locations	1:500

EXECUTIVE SUMMARY

A detailed air quality assessment has been undertaken to assess the potential air quality effects at the Proposed Development on land at Bendix Street, Manchester. Air quality at proposed sensitive receptors, representative of future areas within the building footprint where users could be exposed to adverse air quality, has been conducted using the atmospheric dispersion model, ADMS-Roads. The Proposed Development consists of up to 161 residential apartments over 13 storeys.

Annual mean NO_2, PM_{10} and $PM_{2.5}$ concentrations have been modelled at three proposed receptor locations at the lower five floors and the top floor of the development, using the most recent Emission Factor Toolkit available from DEFRA (version 9). A sensitivity analysis has applied 2018 background pollution concentrations and vehicle emission factors to the 2022 opening year to provide a robust conservative approach has also been undertaken. Predicted annual mean concentrations have been compared to the relevant air quality objectives and target level.

The risk to human health due to construction activities has been qualitatively assessed to be a negligible to low risk for demolition, earthworks and trackout, and medium for construction for dust soiling effects and human health effects. Mitigation measures have been proposed to further reduce any potential impacts based on best practice guidance.

The air quality assessment has concluded that there is no risk to future occupants from adverse air quality in 2022 when the development is predicted to open. Concentrations of NO_2, PM_{10} and $PM_{2.5}$ are predicted to be below the air quality objectives and target level in 2022. The sensitivity analysis predicts an exceedance of the NO_2 air quality objective for the proposed commercial premises on the ground and first floors adjacent to Oldham Road.

The assessment has demonstrated that the Proposed Development will not lead to an unacceptable risk from air pollution, or to any breach in national objectives. Therefore, there are no material reasons in relation to air quality why the proposed scheme should not proceed, subject to appropriate planning conditions.

1 INTRODUCTION

1.1 Background

1.1.1 Wardell Armstrong LLP (WA) has been commissioned by Mulbury Homes (Central) Limited to undertake an air quality assessment for a Proposed Development situated off Bendix Street, Manchester.

1.1.2 This report relates to Bendix Street, Manchester. WA has also prepared similar air quality assessment reports for the same Applicant, for developments at Goulden Street and Oldham Road, Manchester. Each would be submitted as a separate planning application.

1.1.3 The Proposed Development is bound by Thompson Street to the north east, Oldham Road to the south, Bendix Street to the south west and a building occupied by Turning Point to the north west. The Site comprises circa 0.14 ha of developed land, currently used as a locksmith business and a secure car park.

1.1.4 This report details the results of the air quality assessment undertaken in support of a full planning application for the proposed development. The report discusses the potential dust and fine particulate matter impacts associated with the construction phase, and an assessment of the potential air quality impacts at three proposed receptor locations within the development site itself.

1.1.5 The report has been compiled using the most recent version of the Emission Factor Toolkit (EFT - version 9.0), which was released by DEFRA in May 2019.

2 LEGISLATION AND POLICY CONTEXT

2.1 Relevant Air Quality Legislation and Guidance

2.1.1 The air quality assessment has been undertaken in accordance with the following legislation and guidance:

- EU Ambient Air Quality Directive 2008/50/EC (i.e. the CAFE Directive);
- The Environment Act 1995;
- Department of Environment, Food and Rural Affairs, The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, July 2007;
- The Air Quality Standards Regulations 2010;
- Department for Environment, Food and Rural Affairs, Local Air Quality Management Technical Guidance LAQM.TG(16), February 2018;
- Ministry of Housing, Communities and Local Government, National Planning Policy Framework, February 2019; and
- Department for Communities and Local Government, Planning Practice Guidance: Air Quality, March 2014.

2.1.2 Further details of these documents are included in **Appendix A**.

2.2 Assessment Criteria

2.2.1 The relevant air quality objectives and limit values for this assessment are included within Table 1.

Table 1: Air Quality Objectives and Limit Values Relevant to the Assessment*

Pollutant	Objective/Limit Value	Averaging Period	Obligation
Nitrogen Dioxide (NO_2)	200µg/m^3, not to be exceeded more than 18 times a year	1-hour mean	All local authorities
	40µg/m^3	Annual mean	All local authorities
Particulate Matter (PM_{10})	50µg/m^3, not to be exceeded more than 35 times a year	24-hour mean	England, Wales and Northern Ireland
	40µg/m^3	Annual mean	England, Wales and Northern Ireland
	18µg/m^3	Annual mean	Scotland only
Particulate Matter ($PM_{2.5}$)	Limit Value of 25µg/m^3	Annual mean	England, Wales and Northern Ireland
	10µg/m^3	Annual mean	Scotland only

Table 1: Air Quality Objectives and Limit Values Relevant to the Assessment*			
Pollutant	**Objective/Limit Value**	**Averaging Period**	**Obligation**
**In accordance with the Air Quality Standards Regulations 2010*			

2.2.2 Further details of where these objectives and limit values apply are detailed in **Appendix A**.

3 ASSESSMENT METHODOLOGY

3.1 Consultation and Scope of Assessment

3.1.1 The assessment methodology was discussed and agreed with Ms Sue Jones, Neighbourhood Officer at Manchester City Council (MCC), via email correspondence, between 1st August 2018 and 15th August 2018.

3.1.2 A summary of the consultation undertaken is provided in Table 2.

Table 2: Summary of Consultation

Assessment Stage	Proposed Method	Response
Construction phase assessment to consider dust and fine particulate matter (PM_{10})	Qualitative assessment in accordance with Institute of Air Quality Management (IAQM) guidance	No objection to method
Operational phase assessment to consider nitrogen dioxide (NO_2) and fine particulate matter (PM_{10} and $PM_{2.5}$)	Detailed assessment using the ADMS-Roads atmospheric dispersion model, in accordance with Environmental Protection UK (EPUK)/IAQM guidance, and with all predicted concentrations compared to air quality objectives/limit values	No objection to method
	Meteorological data from Manchester Airport recording station	No objection to method
	Background concentrations from 2015-based DEFRA default maps	No objection to method
	Assessment undertaken using EFT8.0.1 emission factors.	No objection to method
	Pollutant concentrations will only be considered on-site.	No objection to method
	Model verification using roadside diffusion tube Man71 (Great Ancoats Street)	No objection to method

3.1.4 Since the methodology was discussed, EFTv9 has been released, and 2018 monitoring data and meteorological data has become available which have been used in this assessment. MCC also confirmed that a sensitivity analysis would be required.

3.2 Construction Phase Impacts

3.2.1 To assess the impacts associated with dust and fine particulate matter releases during the construction phase of the development, an assessment has been undertaken in accordance with guidance from the Institute of Air Quality Management (IAQM)[1].

[1] Institute of Air Quality Management, Guidance on the Assessment of Dust from Demolition and Construction, February 2014

Further details of the construction assessment methodology are provided in **Appendix B**.

3.2.2 The closest sensitive human receptors to where construction phase activities will take place are mostly commercial and are detailed in Table 3.

Table 3: Existing Sensitive Receptors Considered in the Construction Phase Assessment

Receptor	Direction from the Site	Approximate Distance from the Site Boundary (m)
Existing commercial premises along Thompson Street	North East	32m at closest point.
Existing residential properties on Oldham Road	South East & South	38m at closest point.
Existing residential properties on Swan Street Road	West	182m at closest point.

3.2.3 There are no ecological receptors, or potentially dust sensitive statutory designated habitat sites, within 50m of the site and/or within 50m of the route(s) used by construction vehicles on the public highway, up to 500m from the site entrance(s). Ecological effects do not therefore need to be considered within this assessment.

3.2.4 The criteria used to assess the construction impact of the proposed development, and the associated significance of effects at existing sensitive receptors, are included in **Appendix B**.

3.3 Operational Phase Assessment

3.3.1 The air dispersion model ADMS-Roads (CERC, Version 4.1) has been used to assess the impacts associated with road traffic emissions during the operational phase assessment. The impacts have been assessed in accordance with guidance from Environmental Protection UK (EPUK) and the IAQM[2]. Further details of the modelling and assessment methodology are provided in **Appendix C**.

3.3.2 NO_2, PM_{10} and $PM_{2.5}$ concentrations have been predicted at proposed sensitive receptors, as these are the pollutants considered most likely to exceed the objectives

[2] Moorcroft and Barrowcliffe et al, Land-Use Planning and Development Control: Planning for Air Quality (v1.2), January 2017

and limit values. Existing sensitive receptors do not need to be assessed as the proposed residential units do not have allocated car parking.

3.3.3 Air dispersion modelling has been carried out to estimate pollutant concentrations, due to road traffic emissions, for two assessment scenarios as follows:

- **Scenario 1:** 2018 Verification, the most recent year for which traffic flow information, local monitored pollution data and meteorological data is available; and
- **Scenario 2:** 2022 Opening/Future Year, with the proposed development in place.

Existing Sensitive Receptor Locations

3.3.4 The Proposed Development will have 1 disabled parking space only and can therefore be described as 'car-free' and will result in negligible vehicle additions to the local road network. The existing use at the Site is a car park therefore the Proposed Development could result in an overall net decrease of vehicles on the local road network. Additionally, the proposed development will have 161 secure cycle spaces.

3.3.5 Exceedance of the 100 AADT light duty vehicle criterion (specified in the EPUK 2017 Guidance[3]) will not occur. This criterion specifies when a detailed assessment of the impact to existing sensitive receptors in an AQMA is required, as a result of vehicle generation.

3.3.6 Therefore, as there will be no increase in vehicles from the development, air quality concentrations at existing sensitive receptors have not been assessed, which was agreed with MCC prior to the assessment being undertaken.

Proposed Sensitive Receptors

3.3.7 Three proposed sensitive receptors (referred to as PR 1 to PR 3) have been selected within the development site boundary. These receptors are considered to be representative of the proposed residential units which will be closest to the main existing source(s) of pollution. In this case, the main source is considered to be vehicle emissions from Oldham Road and Thompson Street.

3.3.8 Details of the proposed sensitive receptors are provided in Table 4, and the location is shown on drawing GM10076-001.

[3] Environmental Protection (EPUK) & Institute of Air Quality Management (IAQM) 2017. Land-Use Planning & Development Control: Planning for Air Quality

Table 4: Proposed Sensitive Receptors Considered in the Operational Phase Assessment			
Receptor Point	Location	Grid Reference	
		Easting	Northing
PR 1	Proposed sensitive receptor location in the south west of the building footprint	384813	398841
PR 2	Proposed sensitive receptor location in the south east of the building footprint	384830	398852
PR 3	Proposed sensitive receptor location in the north east of the building footprint	384788	398893

3.3.9 The proposed receptor locations have been modelled at multiple heights from the ground floor to the fourth floor, and the top floor (12th). However, residential bedrooms are not planned for the ground floor adjacent to Oldham Road.

3.3.10 The predicted concentrations at the proposed receptors have been assessed against the air quality objectives and limit values detailed in Table 1.

3.4 Limitations and Uncertainties

3.4.1 At present, there is a degree of uncertainty associated with the prediction of future NO_2 concentrations, and consequently the assessment of impacts relating to development generated road traffic emissions.

3.4.2 Air quality assessments make use of official sources of information (i.e. vehicle emission factors and background concentrations) which are increasingly considered to be overly optimistic. Monitoring data collected by the UK Government and local authorities shows that annual mean NO_2 concentrations have remained higher than previously expected (especially in roadside locations). This is widely thought to be due to the lower than expected decline in NO_x emissions from diesel vehicles (even as new Euro standards have been introduced), coupled with an overall increase in the number of diesel vehicles on the road.

3.4.3 The vehicle emission factors used in this assessment are from Defra's Emission Factor Toolkit (EFT v9[4]), which is the most up-to-date version available. Although this is considered to be more realistic than earlier versions, uncertainty remains.

3.4.4 A position statement has recently been produced by the IAQM which deals specifically with the use of EFT v8.0 and the consideration of uncertainties in predicting future air

[4] Defra Local Air Quality Management webpages (https://laqm.defra.gov.uk/review-and-assessment/tools/emissions-factors-toolkit.html)

quality[5]. The statement concludes that the approaches for dealing with this uncertainty should be decided on a case-by-case basis, but may include use of a sensitivity test (i.e. where it is assumed that NO_x emissions will not reduce as quickly as within the EFT). The statement also highlights the need for careful consideration of the results of any sensitivity test, particularly with regard to assessing impacts and the significance of effects. A precautionary approach is recommended. As yet no IAQM update has been provided for EFTv9, however it is considered that uncertainty still exists.

3.4.5 A sensitivity analysis has therefore been undertaken alongside the impact assessment. This has taken into account the uncertainties associated with predicting future air quality by applying 2018 background pollution concentrations and vehicle emission factors to the 2022 opening year/future year, to provide a robust conservative approach. Further details of the methodology are provided in **Appendix C** and the results are detailed in section 5 of this report.

[5] Institute of Air Quality Management, Dealing with Uncertainty in Vehicle NO_x Emissions within Air Quality Assessments v1.1, July 2018

4 BASELINE SITUATION

4.1 Manchester City Council Local Air Quality Management

4.1.1 The proposed development site is located within the administrative area of Manchester City Council (LCC), which is responsible for the management of local air quality.

4.1.2 The Greater Manchester AQMA covers the whole of the city centre, with tendrils extending along main arterial roads to outlying areas. It has been declared by MCC for exceedances of the NO_2 annual mean objective.

4.1.3 There is one roadside NO_2 diffusion tube located on Angel Street, approximately 360m to the north west of the site. However, local construction activities have influenced the results. Therefore, model verification has been undertaken using the diffusion tube located on Great Ancoats Street, approximately 650m to the south east of the site. Monitoring data for 2018, provided by MCC, showed monitored annual mean NO_2 concentration of 46.10µg/m^3 at this location.

4.2 Background Air Pollutant Concentrations

4.2.1 The air quality assessment needs to take into account background concentrations upon which the local, traffic derived pollution is superimposed.

4.2.2 As there are currently no representative NO_2, PM_{10} or $PM_{2.5}$ background monitoring locations in the vicinity of the proposed development site, background concentrations have therefore been obtained from the 2017-based Defra default concentration maps, for the appropriate grid squares[6].

4.2.3 The background pollutant concentrations used in this assessment are detailed in Table 5.

Table 5: Background Pollutant Concentrations Used in the Air Quality Assessment.

Pollutant	Annual Mean Concentrations (µg/m^3)			
	NOx	NO_2	PM_{10}	$PM_{2.5}$
2018 Base Year				
PR 1 – PR 3 (384500, 398500)	54.68	32.03	13.37	8.78
2022 Opening Year				
PR 1 – PR 3	44.07	27.24	12.86	8.35

[6] Accessed through the Defra Local Air Quality Management webpages (http://laqm.defra.gov.uk/review-and-assessment/tools/background-maps.html)

Table 5: Background Pollutant Concentrations Used in the Air Quality Assessment.				
Pollutant	**Annual Mean Concentrations (µg/m^3)**			
	NOx	**NO_2**	**PM_{10}**	**$PM_{2.5}$**
(384500, 398500)				
**Obtained from the Defra 2017-based background maps*				

4.3 Modelled Baseline Concentration

4.3.1 The baseline assessment (i.e. scenario 1) has only been carried out for model verification purposes. Proposed receptors only need to be considered once the development is fully operational.

5 IMPACT ASSESSMENT

5.1 Construction Phase

Step 2 – Impact Assessment

5.1.1 In accordance with the IAQM guidance, the main activities to be considered during the construction phase of the proposed development are demolition, earthworks, construction and trackout.

5.1.2 Demolition is required for the locksmiths adjacent to Oldham Road on an otherwise empty plot of lane. Earthworks covers the processes of soil-stripping, ground-levelling, excavation and landscaping. Construction activities will focus on the proposed buildings. Trackout is defined as the transport of dust and dirt by vehicles travelling from a construction site on to the public road network. This may occur through the spillage of dusty materials onto road surfaces or through the transportation of dirt by vehicles that have travelled over muddy ground on the site. This dust and dirt can then be deposited and re-suspended by other vehicles.

Step 2A

5.1.3 Step 2A of the assessment defines the potential dust emission magnitude from demolition, earthworks, construction and trackout in the absence of site-specific mitigation.

5.1.4 Examples of the criteria for the dust emission classes are detailed in **Appendix B**. The results of this step are detailed in Table 8.

Step 2B

5.1.5 Step 2B of the construction phase dust assessment defines the sensitivity of the area, taking into account the significance criteria detailed in **Appendix B**, for demolition, earthworks, construction and trackout. The sensitivity of the area to each activity is assessed for potential dust soiling, human health effects and ecological effects.

5.1.6 For demolition, earthworks and construction, there are currently between 10 and 100 receptors (commercial and residential) within 50m of where these activities may take place, which is assumed to be the site boundary for the purposes of this assessment.

5.1.7 The routing of construction vehicles is unknown at this stage. Therefore, for the purposes of this assessment, worst case routing scenarios have been assumed for assessment of potential trackout impacts at nearby receptors.

5.1.8 As a result, for trackout, there are between 10 and 100 receptors (commercial and residential) within 50m of where trackout may occur for a distance of up to 500m from the site entrance.

Step 2C

5.1.9 Step 2C of the construction phase dust assessment defines the risk of impacts from each activity, by combining the dust emission magnitude with the sensitivity of the surrounding area.

5.1.10 The risk of dust impacts from each activity, with no mitigation in place, has been assessed in accordance with the criteria detailed in **Appendix B**. The results of this step are detailed in Table 6.

Summary of Step 2

5.1.11 Table 6 details the results of Step 2 of the construction phase assessment for human receptors.

Table 6: Construction Phase Dust Assessment for Human Receptors

	Activity			
	Demolition	**Earthworks**	**Construction**	**Trackout**
Step 2A				
Dust Emission Magnitude	Small[a]	Small[b]	Large[c]	Small[d]
Step 2B				
Sensitivity of Closest Receptors	High	High	High	High
Sensitivity of Area to Dust Soiling Effects	Medium	Medium	Medium	High
Sensitivity of Area to Human Health Effects	Low[e]	Low[e]	Low[e]	Low[e]
Step 2C				
Dust Risk: Dust Soiling	Low Risk	Low Risk	Medium Risk	Negligible Risk
Dust Risk: Human Health	Negligible Risk	Negligible Risk	Low Risk	Negligible Risk

a. Total volume estimated to be less than 20,000m^3
b. Total site area estimated to be less than 2,500m^2
c. Total building volume estimated to be more than 100,000m^3
d. Number of construction phase vehicles estimated to be less than 10 movements per day

Table 6: Construction Phase Dust Assessment for Human Receptors				
	Activity			
	Demolition	Earthworks	Construction	Trackout
e. Background annual mean PM_{10} concentration is taken from the LAQM Defra default concentration maps, for the appropriate grid square for 2018				

Step 3 – Mitigation

5.1.12 During the construction phase, the implementation of effective mitigation measures will substantially reduce the potential for nuisance dust and particulate matter to be generated.

5.1.13 Step 2C of the assessment has identified that the risk of dust soiling and human health effects is not negligible for all the activities and therefore site-specific mitigation will need to be implemented to ensure dust effects from these activities will be not significant.

Recommendations for Site-Specific Mitigation

5.1.14 Specific mitigation relating to dust control may be in the form of construction best practices or could include a dust management plan. Recommendations for mitigation within the IAQM guidance include:

- Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable;
- Protection of surfaces and exposed material from winds until disturbed areas are sealed and stable;
- Dampening down of exposed stored materials, which will be stored as far from sensitive receptors as possible;
- 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;
- Avoidance of activities that generate large amounts of dust during windy conditions;
- 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;
- Avoid dry sweeping of large areas;

- 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;
- Ensure vehicles entering and leaving the site are covered to prevent escape of materials during transport;
- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable);
- Minimisation of vehicle movements and limitation of vehicle speeds – the slower the vehicle speeds, the lower the dust generation;
- Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever the site size and layout permits; and
- Access gates to be located at least 10m from receptors, where possible.

5.1.15 All dust and air quality complaints should be recorded and appropriate measures be taken to identify causes and reduce emissions in a timely manner. Exceptional incidents which cause dust and/or emissions, and the action taken to resolve the situation, should be recorded in a log book and made available to MCC on request.

5.1.16 It is recognised that the final design solutions will be developed with the input of the Contractor to maximise construction efficiencies, to use modern construction techniques and sustainable materials and to incorporate the particular skills and experience offered by the appointed contractor.

Step 4 – Residual Effects

5.1.17 Step 4 of the construction phase dust assessment has been undertaken to determine the significance of the dust effects arising from demolition, earthworks, construction and trackout associated with the proposed development.

5.1.18 The implementation of effective mitigation measures during the construction phase, such as those detailed in Step 3, will substantially reduce the potential for nuisance dust and particulate matter to be generated and any residual impact should be **not significant**.

5.2 Operational Phase Impact Assessment

Proposed Sensitive Receptors

5.2.1 Pollutant concentrations have been modelled for proposed receptors for the 2021 'With Development' scenario, as detailed in Table 7.

Table 7: Predicted Adjusted NO_2, and Unadjusted PM_{10} and $PM_{2.5}$ Concentrations at Proposed Sensitive Receptors for Scenario 2

Proposed Receptor Location	Level Height	Calculated Annual Mean Concentrations (µg/m³)		
		NO_2	PM_{10}	$PM_{2.5}$
PR 1	Ground Floor – 1.5m	37.00	14.60	9.33
	Level One – 4.35m	34.18	14.10	9.05
	Level Two – 7.20m	30.87	13.52	8.72
	Level Three – 10.05m	29.31	13.24	8.56
	Level Four – 12.90m	28.59	13.11	8.48
	Level Eleven – 35.70m	27.41	12.89	8.36
PR 2	Ground Floor – 1.5m	36.39	14.52	9.29
	Level One – 4.35m	33.82	14.05	9.02
	Level Two – 7.20m	30.79	13.51	8.71
	Level Three – 10.05m	29.27	13.23	8.56
	Level Four – 12.90m	28.56	13.10	8.48
	Level Eleven – 35.70m	27.41	12.89	8.36
PR 3	Ground Floor – 1.5m	30.74	13.50	8.71
	Level One – 4.35m	30.39	13.44	8.67
	Level Two – 7.20m	29.83	13.34	8.61
	Level Three – 10.05m	29.23	13.23	8.55
	Level Four – 12.90m	28.71	13.13	8.50
	Level Eleven – 35.70m	27.43	12.90	8.36

5.2.2 The results of the assessment show that all predicted NO_2, PM_{10} and $PM_{2.5}$ concentrations are below the relevant objectives and limit values.

5.3 Operational Phase Sensitivity Analysis

Proposed Sensitive Receptors

5.3.1 Pollutant concentrations have been modelled for proposed receptors for the 2022 'With Development' scenario, as detailed in Table 8. This assumes no improvement in vehicle emissions and background concentrations between 2018 and 2022.

Table 8: Predicted Adjusted NO_2, and Unadjusted PM_{10} and $PM_{2.5}$ Concentrations at Proposed Sensitive Receptors for Scenario 2 – Sensitivity Analysis

Proposed Receptor Location	Level Height	Calculated Annual Mean Concentrations (µg/m³)		
		NO_2	PM_{10}	$PM_{2.5}$
PR 1	Ground Floor – 1.5m	46.06	15.24	9.90
	Level One – 4.35m	42.06	14.70	9.58
	Level Two – 7.20m	37.32	14.08	9.20
	Level Three – 10.05m	35.06	13.78	9.02
	Level Four – 12.90m	34.01	13.63	8.94
	Level Twelve – 35.70m	32.28	13.40	8.80
PR 2	Ground Floor – 1.5m	45.17	15.15	9.85
	Level One – 4.35m	41.54	14.65	9.55
	Level Two – 7.20m	37.20	14.06	9.19
	Level Three – 10.05m	35.00	13.77	9.02
	Level Four – 12.90m	33.97	13.63	8.94
	Level Twelve – 35.70m	32.28	13.40	8.80
PR 3	Ground Floor – 1.5m	37.15	14.06	9.19
	Level One – 4.35m	36.64	13.99	9.15
	Level Two – 7.20m	35.83	13.88	9.08
	Level Three – 10.05m	34.96	13.76	9.01
	Level Four – 12.90m	34.20	13.66	8.95
	Level Twelve – 35.70m	32.31	13.41	8.80

Underlined concentrations indicate an exceedance of the air quality objective

5.3.2 The results of the sensitivity analysis show a predicted exceedance of NO_2 concentrations at the ground and first floor adjacent to Oldham Road. However, commercial units are proposed for this section of the proposed development. The closest residential dwellings to Oldham Road on the ground floor are set back approximately 28m from the road.

5.3.3 The results of the sensitivity analysis show that all predicted PM_{10} and $PM_{2.5}$ concentrations are below the relevant objectives and limit values.

Assessment of Significance for Human Health

5.3.4 The significance of the overall effects of the proposed development has been assessed in accordance with the EPUK/IAQM guidance. This assessment is based on professional judgement and details of the assessor's experience is included in **Appendix D**.

5.3.5 The assessment of significance has taken into account the results of the assessment. PM_{10} and $PM_{2.5}$ concentrations within the proposed development site are predicted to be below the relevant objectives and limit values for both the impact assessment and the sensitivity analysis. NO_2 concentrations only exceed air quality objectives for the sensitivity analysis, which is highly conservative and assumes no improvement in background concentrations and vehicle emission factors from 2018 to 2022. Additionally, the exceedance only occurs on the ground and first floors adjacent to Oldham Road, which is reserved for commercial units.

5.3.6 Much of the development site is currently a secure carpark, with the proposed development only having one disable parking bay. Therefore, the proposed development should see a net reduction in traffic in the vicinity of the site. Additionally, the proposed development will have 161 secure cycle spaces.

5.3.7 Based on this, in accordance with the EPUK/IAQM guidance, the effect of the proposed development on human health is considered to be **not significant**.

6 CONCLUSIONS

6.1 Construction Phase

6.1.1 The construction phase assessment has been undertaken to determine the risk and significance of dust and fine particulate matter effects from demolition, earthworks, construction and trackout associated with the proposed development, in accordance with guidance published by the IAQM.

6.1.2 With site specific mitigation measures in place, the significance of dust and fine particulate effects from demolition, earthworks, construction and trackout is considered to be **not significant**.

6.2 Operational Phase

Proposed Sensitive Receptors

6.2.1 The assessment has predicted pollutant concentrations at three proposed receptor locations within the development site, at multiple heights.

6.2.2 Predicted NO_2, PM_{10} and $PM_{2.5}$ concentrations are below the annual mean air quality objective and limit value concentrations, for 2022, at the proposed sensitive receptors considered. An exceedance of the NO_2 objective is only predicted for the highly conservative sensitivity analysis, and then only on the ground and first floor adjacent to Oldham Road. This section of the development is reserved for commercial units. Air quality effects within the site are, therefore, considered to be **not significant**.

6.3 Summary

6.3.1 The assessment has demonstrated that the proposed development will not lead to an unacceptable risk from air pollution, nor will it lead to any breach of national objectives as required by national policy. There are no material reasons in relation to air quality why the proposed scheme should not proceed.

APPENDICES

Appendix A: Air Quality Legislation and Guidance

European Legislation

A.1 The European Union (EU) Ambient Air Quality Directive 2008/50/EC[1] (i.e. the CAFE Directive) came into force in June 2008. This EU Directive consolidates previous air quality legislation, with the exception of the 4th daughter Directive[2], and sets air quality limit values for seven pollutants. The Directive also provides a regulatory framework for fine particulate matter smaller than 2.5µm in diameter ($PM_{2.5}$).

A.2 EU Directive 2008/50/EC was transposed into legislation in the UK on 11th June 2010 as The Air Quality Standards Regulations 2010[3].

National Air Quality Strategy

A.3 The Environment Act 1995 requires the UK government to prepare a national Air Quality Strategy. The first UK strategy was published in March 1997, setting out policies for the management of ambient air quality. This was subsequently updated in 2007[4].

A.4 The 2007 strategy establishes the framework for air quality management in England, Scotland, Wales and Northern Ireland. Air quality standards and objectives are set out for eight pollutants which may potentially occur at levels that give cause for concern. The strategy also provides details of the role that local authorities are required to take in working towards improvements in air quality, known as the Local Air Quality Management (LAQM) regime.

Air Quality Standards and Objectives

A.5 Air quality standards and objectives are set out in the strategy for the following pollutants: nitrogen dioxide (NO_2), sulphur dioxide (SO_2), carbon monoxide (CO), lead (Pb), fine particulate matter (PM_{10}), benzene (C_6H_6), 1, 3–butadiene (C_4H_6) and ozone (O_3).

[1] Directive 2008/50/EC of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe
[2] Directive 2004/107/EC of the European Parliament and the Council of 15th December 2004 relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air
[3] The Air Quality Standards Regulations 2010
[4] Department of Environment, Food and Rural Affairs, The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. July 2007

A.6 Objectives for each pollutant, except O_3, were first given statutory status in the Air Quality Regulations 2000[5] and Air Quality (Amendment) Regulations 2002[6]. These objectives are defined in the strategy as:

"the maximum ambient concentration not to be exceeded, either without exception or with a permitted number of exceedances, within a specified timescale."

A.7 The EU limit values, transposed into UK legislation as The Air Quality Standards Regulations 2010, are mostly the same as the air quality objectives in terms of concentrations; however, there are differences in determining how compliance is achieved.

A.8 Whilst there is no specific objective for $PM_{2.5}$ in England and Wales, a limit value of 25µg/m^3 is referred to in the regulations, which has been adopted for use in this assessment (as recommended by the LAQM Helpdesk). An objective has been set for $PM_{2.5}$ in Scotland since early 2016.

A.9 Examples of where these objectives and limit values apply are detailed in the Defra LAQM Technical Guidance document LAQM.TG(16)[7] and are included in Table A1.

Table A1: Examples of Where the Air Quality Objectives Should Apply

Averaging Period	Objectives Should Apply at:	Objectives Should Generally 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, etc.	Building facades 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 and 8-hour mean	All locations where the annual mean objectives would apply, together with hotels. Gardens of residential properties[a]	Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term

[5] The Air Quality Regulations 2000. SI No 928
[6] The Air Quality (Amendment) Regulations 2002
[7] Department for Environment, Food and Rural Affairs, Local Air Quality Management Technical Guidance LAQM.TG(16), February 2018

Table A1: Examples of Where the Air Quality Objectives Should Apply		
Averaging Period	**Objectives Should Apply at:**	**Objectives Should Generally Not Apply at:**
1-hour mean	All locations where the annual mean and 24 and 8-hour objectives apply. Kerbside sites (e.g. pavements of busy shopping streets). Those parts of car parks and railway stations etc. which are not fully enclosed, where members of the public might reasonably be expected to spend one hour or more. Any outdoor locations to which the public might reasonably be expected to spend one hour or longer	Kerbside sites where public would not be expected to have regular access
15-minute mean	All locations where members of the public might reasonably be exposed for a period of 15 minutes or longer	
[a.] *Such locations should represent parts of the garden where relevant public exposure is likely, for example where there is seating or play areas. It is unlikely that relevant public exposure to pollutants would occur at the extremities of the garden boundary, or in front gardens, although local judgement should always be applied*		

Local Air Quality Management

A.10 LAQM legislation in the Environment Act 1995 requires local authorities to conduct the periodic review and assessments of air quality. These aim to identify all those areas where the objectives are being, or are likely to be, exceeded. Where exceedances are likely to occur, local authorities are required to declare an Air Quality Management Area (AQMA).

A.11 LAQM.TG(16) presents a streamlined approach for LAQM in England and Scotland; however, Wales and Northern Ireland are still considering changes to LAQM and therefore work according to the previous regimes.

A.12 Local authorities in England are required to produce Annual Status Reports (ASRs), and in Scotland, Annual Progress Reports (APRs). These replace all other reports which previously had to be submitted including Updating and Screening Assessments, Progress Reports and Detailed Assessments (which would be produced to assist with an AQMA declaration).

A.13 Local authorities now have the option of a fast track AQMA declaration option. This allows more expert judgement to be used and removes the need for a Detailed

Assessment where a local authority is confident of the outcome. Detailed Assessments should however still be used if there is any doubt.

A.14 As part of the UK Government's requirement to improve air quality, selected local authorities in England are also currently investigating the feasibility of setting up Clean Air Zones (CAZs). These are areas where targeted action and co-ordinated resources aim to improve air quality within an urban setting, in order to achieve compliance with the EU limit values within the shortest possible time.

A.15 Five local authorities outside of London were initially selected to implement a CAZ by 2020 (Birmingham, Leeds, Nottingham, Derby and Southampton). A further 23 local authorities were subsequently chosen to investigate the feasibility of establishing a CAZ, and 33 local authorities may potentially have to proceed to this stage where compliance is not achieved.

National Planning Policy Framework

A.16 The National Planning Policy Framework (NPPF)[8], introduced in March 2012 and most recently updated in February 2019, requires 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 AQMAs and CAZs, 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 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 AQMAs and CAZs is consistent with the local air quality action plan."

Planning Practice Guidance

A.17 The Planning Practice Guidance (PPG)[9], updated in March 2014, states that whether or not air quality is relevant to a planning decision will depend on the proposed development and its location. Concerns could arise if the development is likely to

[8] Ministry of Housing, Communities and Local Government, National Planning Policy Framework, February 2019
[9] Department for Communities and Local Government. Planning Practice Guidance: Air Quality, March 2014

generate air quality impacts in an area where air quality is known to be poor. They could also arise where the development is likely to adversely impact upon the implementation of air quality strategies and action plans and/or, in particular, lead to a breach of EU legislation (including that applicable to wildlife).

A.18 Where a proposed development is anticipated to give rise to concerns about air quality, an appropriate assessment needs to be carried out. Where the assessment concludes that the proposed development (including mitigation) will not lead to an unacceptable risk from air pollution, prevent sustained compliance with national objectives or fail to comply with the requirements of the Habitats Regulations, then the local authority should proceed to decision with appropriate planning conditions and/or obligations.

Appendix B: Methodology for Construction Phase Assessment

Institute of Air Quality Management Guidance

B.1 The methodology for the construction phase dust assessment is set out in guidance from the Institute of Air Quality Management (IAQM)[10].

Step 1

B.2 Step 1 is to screen the requirement for a more detailed assessment. The guidance states that an assessment will normally be required where there are existing sensitive human receptors within 350m of the site boundary and/or within 100m of the route(s) used by construction vehicles on the public highway, up to 500m from the site entrance(s).

B.3 With regards to ecological receptors, the guidance states that an assessment will normally be required where there are existing receptors within 50m of the site boundary and/or within 50m of the route(s) used by construction vehicles on the public highway, up to 500m from the site entrance(s).

B.4 Where any of these criteria are met, it is necessary to proceed to Step 2.

Step 2

B.5 Step 2 determines the potential risk of dust arising in sufficient quantities to cause annoyance and/or health or ecological impacts. The risk is related to:

- The activities being undertaken (demolition, number of vehicles and plant etc);
- The duration of these activities;
- The size of the site;
- The meteorological conditions (wind speed, direction and rainfall);
- The proximity of receptors to the activity;
- The adequacy of the mitigation measures applied to reduce or eliminate dust; and
- The sensitivity of receptors to dust.

B.6 The risk of dust impacts is determined using four risk categories: negligible, low, medium and high risk. A site is allocated to a risk category based upon the following two factors (known as Step 2A and Step 2B).

[10] Institute of Air Quality Management, Guidance on the Assessment of Dust from Demolition and Construction, February 2014

B.7 **Step 2A** assesses the scale and nature of the works which determines the potential dust emission magnitude as small, medium or large. Examples of how the magnitude may be defined are included in Table B1.

Table B1: Determining the Dust Emission Magnitude of Construction Phase Activities

Activity	Dust Emission Class		
	Large	**Medium**	**Small**
Demolition	Total building volume >50,000m^3; Potentially dusty construction material (e.g. concrete); On-site crushing and screening; Demolition activities >20m above ground level	Total building volume 20,000-50,000m^3; Potentially dusty construction material; Demolition activities 10-20m above ground level	Total building volume <20,000m^3; Construction material with low potential for dust release (e.g. metal cladding or timber)
Earthworks	Total site area >10,000m^2; Potentially dusty soil type (e.g. clay, which will be prone to suspension when dry due to small particle size); >10 heavy earth moving vehicles active at any one time; Formation of bunds >8m in height; Total material moved >100,000 tonnes	Total site area 2,500-10,000m^2; Moderately dusty soil type (e.g. silt); 5-10 heavy earth moving vehicles active at any one time; Formation of bunds 4-8m in height; Total material moved 20,000-100,000 tonnes	Total site area <2,500m^2; Soil type with large grain size (e.g. sand); <5 heavy earth moving vehicles active at any one time; Formation of bunds <4m in height; Total material moved <20,000 tonnes; Earthworks during wetter months
Construction	Total building volume >100,000m^3; On-site concrete batching; Sandblasting	Total building volume 25,000-100,000m^3; Potentially dusty construction material (e.g. concrete); On-site batching	Total building volume <25,000m^3; Construction material with a low potential for dust release (e.g. metal cladding or timber)
Trackout	>50 HDV (>3.5t) outward movements[a] in any one day[b]; Potentially dusty surface material (e.g. high clay content); Unpaved road length >100m	10-50 HDV (>3,5t) outward movements[a] in any one day[b]; Moderately dusty surface material (e.g. high clay content); Unpaved road length 50-100m	<10 HDV (>3.5t) outward movements[a] in any one day[b]; Surface material with low potential for dust release; Unpaved road length <50m

a. A vehicle movement is a one way journey i.e. from A to B, and excludes the return journey
b. HDV movements during a construction project may vary over its lifetime, and the number of movements is the maximum not the average

B.8 **Step 2B** considers the sensitivity of the area to dust impacts which is defined as low, medium or high. The sensitivity categories for different types of receptors are described in Table B2.

Table B2: Sensitivity Categories for Dust Soiling, Human Health and Ecological Effects

Sensitivity Category	Dust Soiling Effects	Health effects of PM_{10}	Ecological Effects
High	Users can reasonably expect to enjoy a high level of amenity; Appearance, aesthetics or value of a property would be diminished; Examples include dwellings, museums and other culturally important collections, medium and long term car parks and car show rooms	Locations where members of the public are exposed over a period of time relevant to the air quality objective for PM_{10}; Examples include residential properties, hospitals, schools, and residential care homes	Locations with an international or national designation and the designated features may be affected by dust soiling; Locations where there is a community of a particularly dust sensitive species; Examples include a Special Area of Conservation with dust sensitive features
Medium	Users would expect to enjoy a reasonable level of amenity, but would not reasonably expect to enjoy the same level of amenity as in their home; The appearance, aesthetics or value of their property could be diminished; People or property wouldn't reasonably be expected to be continuously present or regularly for extended periods of time; Examples include parks and places of work	Locations where people are exposed as workers and exposure is over a period of time relevant to the air quality objective for PM_{10}; Examples include office and shop workers but will generally not include workers occupationally exposed to PM_{10}	Locations where there is a particularly important plant species, where its dust sensitivity is uncertain or unknown; Locations with a national designation where the features may be affected by dust deposition; Examples include a Site of Special Scientific Interest with dust sensitive features

Table B2: Sensitivity Categories for Dust Soiling, Human Health and Ecological Effects			
Sensitivity Category	**Dust Soiling Effects**	**Health effects of PM_{10}**	**Ecological Effects**
Low	Enjoyment of amenity would not reasonably be expected; Property would not be diminished in appearance, aesthetics or value; People or property would be expected to be present only for limited periods of time; Examples include playing fields, farmland (unless commercially-sensitive horticultural), footpaths, short term car parks and roads	Locations where human exposure is transient; Examples include public footpaths, playing fields, parks and shopping streets	Locations with a local designation where the features may be affected by dust deposition; Examples include a Local Nature Reserve with dust sensitive features

B.9 Based on the sensitivity of individual receptors, the overall sensitivity of the area to dust soiling, human health and ecological effects is then determined using the criteria detailed in Tables B3 to B5, respectively.

Table B3: Sensitivity of the Area to Dust Soiling Effects on People and Property[ab]					
Receptor Sensitivity	**Number of Receptors**	**Distance from Source (m)[c]**			
		<20m	**<50m**	**<100m**	**<350m**
High	>100	High	High	Medium	Low
	10-100	High	Medium	Low	Low
	1-10	Medium	Low	Low	Low
Medium	>1	Medium	Low	Low	Low
Low	>1	Low	Low	Low	Low

a. The sensitivity to the area should be derived for each of the four activities
b. Estimate the total number of receptors within the stated distance. Only the highest level of sensitivity from the table needs to be considered
c. For trackout, distances should be measured from the side of the roads used by construction traffic. Without site specific mitigation, trackout may occur for up to 500m from large sites, 200m from medium sites and 50m from small sites, measured from the site exit. The impact declines with distance from the site and it is only necessary to consider trackout impacts up to 50m from the edge of the road

Table B4: Sensitivity of the Area to Human Health Impacts[ab]							
Receptor Sensitivity	**Annual Mean PM_{10} Concentration[c]**	**Number of Receptors[d]**	**Distance from Source (m)[e]**				
			<20m	**<50m**	**<100m**	**<200m**	**<350m**
High	>32µg/m³	>100	High	High	High	Medium	Low
		10-100	High	High	Medium	Low	Low
		1-10	High	Medium	Low	Low	Low
	28-32µg/m³	>100	High	High	Medium	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	High	Medium	Low	Low	Low
	24-28µg/m³	>100	High	Medium	Low	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	<24µg/m³	>100	Medium	Low	Low	Low	Low
		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Medium	>32µg/m³	>10	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	28-32µg/m³	>10	Medium	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	24-28µg/m³	>10	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	<24µg/m³	>10	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Low	-	>1	Low	Low	Low	Low	Low

a. *The sensitivity to the area should be derived for each of the four activities*
b. *Estimate the total number of receptors within the stated distance. Only the highest level of sensitivity from the table needs to be considered*
c. *Most straightforwardly taken from the national background maps, but should also take account of local sources. The values are based on 32µg/m³ being the annual mean concentration at which an exceedance of the 24-hour mean objective is likely in England, Wales and Northern Ireland. In Scotland, there is an annual mean objective of 18µg/m³*
d. *In the case of high sensitivity receptors with high occupancy (such as schools or hospitals) approximate the number of people likely to be present. In the case of residential dwellings, just include the number of properties*
e. *For trackout, distances should be measured from the side of the roads used by construction traffic*

Table B5: Sensitivity of the Area to Ecological Impacts[ab]		
Receptor Sensitivity	**Distance from the Source (m)[c]**	
	<20	**<50**
High	High	Medium
Medium	Medium	Low
Low	Low	Low

a. *The sensitivity to the area should be derived for each of the four activities*
b. Only the highest level of sensitivity from the table needs to be considered
c. For trackout, distances should be measured from the side of the roads used by construction traffic

B.10 These two factors are combined in **Step 2C** to determine the risk of dust impacts with no mitigation applied.

B.11 The risk of dust effects is determined for four types of construction phase activities, with each activity being considered separately. If a construction phase activity is not taking place on the site, then it does not need to be assessed. The four types of activities to be considered are:

- Demolition;
- Earthworks;
- Construction; and
- Trackout.

B.12 The risk of dust being generated by demolition activities at the site is determined using the criteria in Table B6.

Table B6: Risk of Dust Impacts for Demolition			
Sensitivity of Area	**Dust Emission Magnitude**		
	Large	**Medium**	**Small**
High	High Risk	Medium Risk	Medium Risk
Medium	High Risk	Medium Risk	Low Risk
Low	Medium Risk	Low Risk	Negligible

B.13 The risk of dust being generated by earthworks and construction at the site is determined using the criteria in Table B7.

Table B7: Risk of Dust Impacts for Earthworks and Construction			
Sensitivity of Area	**Dust Emission Magnitude**		
	Large	**Medium**	**Small**
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible

B.14 The risk of dust being generated by trackout at the site is determined using the criteria in Table B8.

Table B8: Risk of Dust Impacts for Trackout			
Sensitivity of Area	**Dust Emission Magnitude**		
	Large	**Medium**	**Small**
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Low Risk	Negligible
Low	Medium Risk	Low Risk	Negligible

Step 3

B.15 Step 3 of the assessment determines the site-specific mitigation required for each of the activities, based on the risk determined in Step 2. Mitigation measures are detailed in guidance published by the Greater London Authority[11], recommended for use outside the capital by LAQM guidance, and the IAQM guidance document itself. Professional judgement should be used to determine the type and scale of mitigation measures required.

B.16 If the risk is classed as negligible, no mitigation measures beyond those required by legislation will be necessary.

Step 4

B.17 Step 4 assesses the residual effect, with mitigation measures in place, to determine whether or not these are significant.

[11] Greater London Authority, The Control of Dust and Emissions from Construction and Demolition: Best Practice Guidance, 2006

Professional Judgement

B.18 The IAQM guidance makes reference to the use of professional judgement when assessing the risks of dust and fine particulate matter from demolition and construction sites. Details of the experience of the personnel involved with the project are provided in **Appendix D**.

Appendix C: Methodology for Operational Phase Assessment

Air Dispersion Modelling Inputs

C.1 The air dispersion model ADMS-Roads (CERC, Version 4.1) has been used to assess the potential air quality impacts associated with development-generated road traffic emissions. This dispersion model is widely used and accepted for the purpose of undertaking assessments to support both planning and Environmental Permit applications.

Traffic Flow Data

C.2 The ADMS-Roads model requires the input of detailed road traffic flow data for those routes which may be affected by the proposed development. Traffic flow data has been provided by SK Transport Planning, the appointed transport consultants for the project. The study extent of the model is shown in Figure C.1.

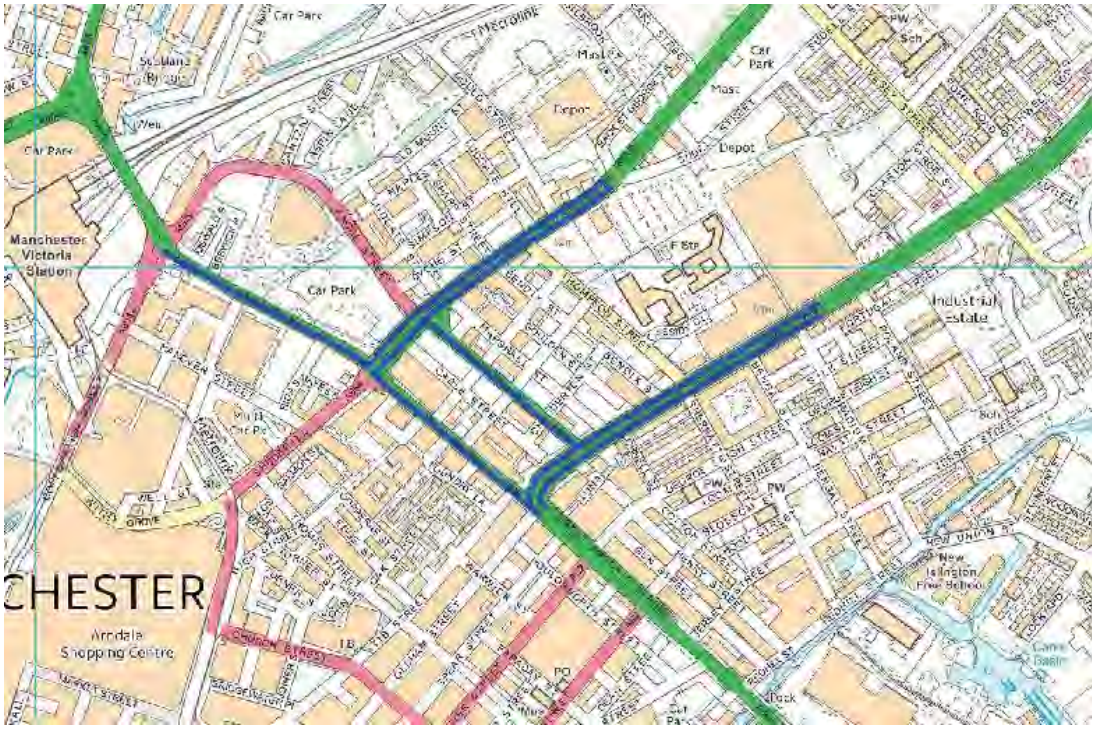


Figure C.1: Study Extent of Air Dispersion Model. The roads modelled in the assessment can be seen in blue (‘*Reproduced from Ordnance Survey Maps © Crown Copyright All Rights Reserved Licence No. AL100019512’)*

C.3 Data has been provided as 24-hour Annual Average Daily Traffic (AADT) flows, with HGV percentages. No average speed information was available and therefore speed limits have been used, with a reduction to 20kph in locations where congestion or the slowing down of vehicles would be expected.

C.4 The traffic flow data used in the assessment is included in Table C1.

Link Name	Speed Info (kph)	Scenario 1: 2018 Verification and Base Year		Scenario 2: 2022 Opening/Future Year, With Development	
		LGV	HGV	LGV	HGV
Oldham Road (n)	48	18257	1145	19940	1250
Oldham Road (s)	48	27176	1310	29680	1431
Addington Street	48	10643	1863	11660	2042
Swan Street	48	14122	838	15405	914
Miller Street	48	15335	345	16721	376
Great Ancoats Street	48	29931	1053	32651	1149
Rochdale Road (n)	48	13040	906	14225	989
Rochdale Road (s)	48	19152	1894	20878	2065
Where OS Mapping shows dual lanes, the traffic data has been halved and modelled as two lanes in the ADMS-Roads model					

Vehicle Emission Factors

C.5 The air quality assessment has used vehicle emission factors calculated using the Emissions Factor Toolkit (EFT) version 9, released in May 2019. This is the most up-to-date version of the EFT currently available.

C.6 As discussed in the section 3.3 of the report, there are uncertainties involved with the prediction of future NO_2 concentrations and therefore 2018 vehicle emission factors and background concentrations have been used to provide a conservative and robust sensitivity analysis.

Meteorological Data

C.7 The meteorological data used in the air quality modelling has been obtained from ADM Limited and is from the Manchester Airport recording station, covering the period between 1st January and 31st December 2018. This has complete data capture for wind and temperature.

C.8 The Manchester Airport recording station is located approximately 13km from the proposed development and is considered to be the most representative of the conditions at the proposed development, due to its relative location and similar altitude.

C.9 The 2019 wind rose for the Manchester Airport Meteorological Recording Station is shown in Figure C2.

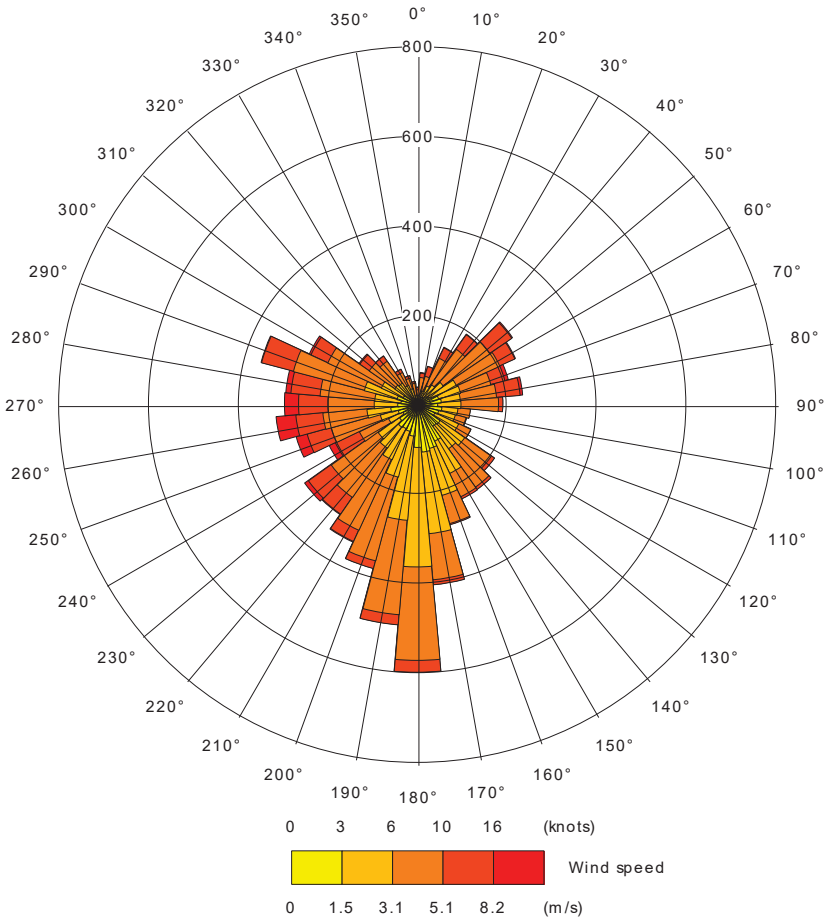


Figure C.2: 2018 Wind Rose for the Manchester Airport Meteorological Station

Dispersion and Meteorological Site Characteristics

C.10 The characteristics for the dispersion site and meteorological sites, included in the ADMS-Roads model, are detailed in Table C2.

Table C2: Dispersion and Meteorological Site Characteristics

Setting	Dispersion Site	Meteorological Site
Surface Roughness	1.5m	0.1m
Surface Albedo	0.23	0.23
Minimum Monin-Obukhov Length	100m	1m

Table C2: Dispersion and Meteorological Site Characteristics		
Setting	**Dispersion Site**	**Meteorological Site**
Priestley-Taylor Parameter	1	1

NO_x to NO_2 Conversion

C.11 In accordance with the guidance within LAQM.TG(16), the ADMS-Roads model has been run to predict the road-contribution NO_x concentrations for each receptor location. These have then been converted to NO_2 concentrations using the Defra NO_x to NO_2 calculator[12].

Model Validation and Verification

C.12 LAQM.TG(16) refers to model validation as *"the general comparison of modelled results against monitoring data carried out by model developers"*. ADMS-Roads is widely accepted by regulatory authorities for use in this type of assessment.

C.13 Model verification is used to check the performance of the model at a local level. The verification of the ADMS-Roads air dispersion model is achieved by modelling concentration(s) at existing monitoring location(s) in the vicinity of the proposed development, and comparing the modelled concentration(s) with the measured concentration(s).

C.14 Following a review of the 2018 monitoring data for Manchester City Council, it is understood there is one roadside air quality monitoring location in close proximity to the proposed development site. This monitor is located on Great Ancoats Street (Diffusion tube ID Man71), approximately 630m south east of the proposed development.

C.15 As no PM_{10} and $PM_{2.5}$ monitoring location is situated along roads where traffic flow data is available, it has not been possible to carry out model verification for modelled PM_{10} and $PM_{2.5}$ concentrations.

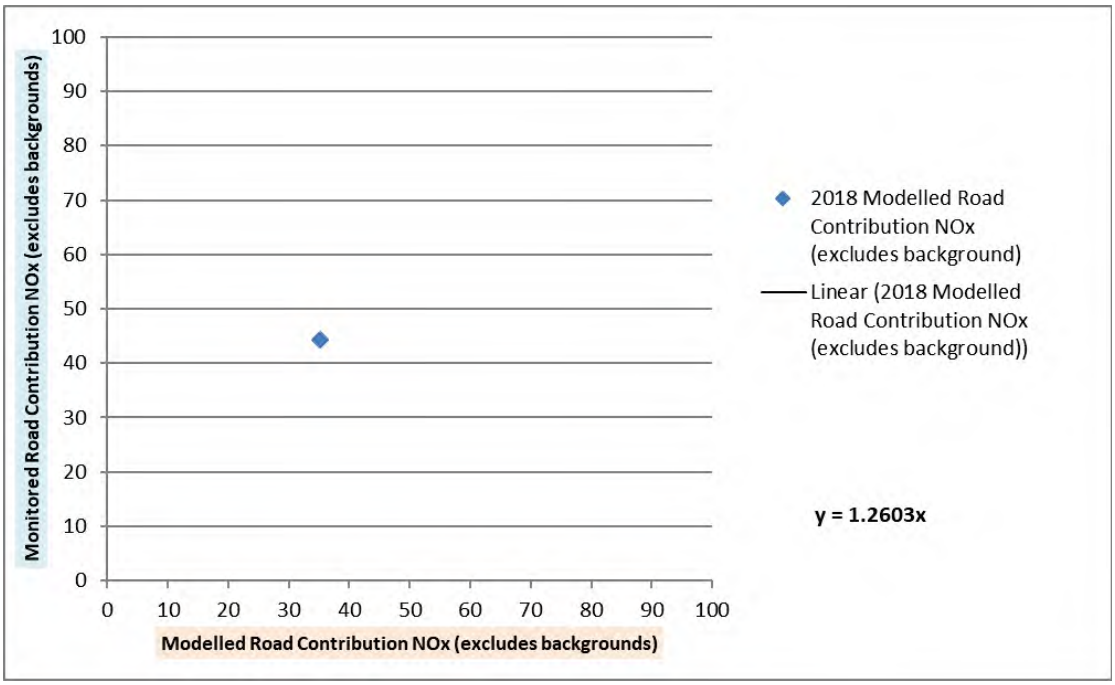
C.16 The monitoring data that has been used in the model verification procedure is detailed in Table C3.

[12] Defra Local Air Quality Management web pages (http://laqm.defra.gov.uk/tools-monitoring-data/no-calculator.html)

Table C3: NO_2 Monitoring Data Used for Verification Purposes				
Monitoring Location Reference	Type	Approximate Grid Reference		2018 Bias Adjusted NO_2 Annual Average Concentration (µg/m³)
		Easting	Northing	
Man71	Roadside Diffusion Tube	385161	398290	46.10

C.17 The modelled road-contribution NO_x concentration for the monitor has been compared against the measured road-contribution NO_x concentration for the same locations. The measured concentrations have been derived using the Defra NO_x to NO_2 calculator, taking into account the background NO_x concentration for the local area.

C.18 The comparison is shown in the below graph. The equation of the trend line is based on linear regression through zero, which provides an overall adjustment factor of 1.2603.



C.19 This adjustment factor has been applied to the modelled road-contribution NO_x concentrations. The total NO_2 concentrations have been derived by combining the adjusted road-contribution NO_x concentration and background NO_2 concentration, using the Defra NO_x to NO_2 calculator.

C.20 A final comparison has been made between the total measured NO_2 concentrations and total modelled NO_2 concentrations, as shown in Table C4. Following adjustment, modelled concentrations are within 10% of measured concentrations.

Table C4: Comparison Between Measured and Monitored NO_2 Concentrations

Monitoring Location Reference	Measured Total NO_2 Concentration ($\mu g/m^3$)	Modelled Total NO_2 Concentration ($\mu g/m^3$)	Difference (%)
Man71	46.10	46.10	0.00

Assessment Criteria

Assessing the Impact of a Proposed Development on Human Receptors

C.21 Guidance has been prepared by Environmental Protection UK (EPUK) and the IAQM[13] with relation to the assessment of the air quality impacts of proposed developments and their significance.

C.22 The impact of a development is usually assessed at specific receptors, and takes into account both the long-term background concentrations, in relation to the relevant Air Quality Assessment Level (AQAL) at these receptors, and the change with the development in place.

C.23 The impact descriptors for individual receptors are detailed in Table C5.

Table C5: Impact Descriptors for Individual Receptors

Long Term Average Concentration at Receptor in Assessment Year*	Percentage Change in Concentration Relative to Air Quality Assessment Level (AQAL)*			
	1%	2-5%	6-10%	>10
75% or less of AQAL	Negligible	Negligible	Slight	Moderate
76-94% of AQAL	Negligible	Slight	Moderate	Moderate
95-102% of AQAL	Slight	Moderate	Moderate	Substantial
103-109% of AQAL	Moderate	Moderate	Substantial	Substantial
110% or more of AQAL	Moderate	Substantial	Substantial	Substantial

[13] Moorcroft and Barrowcliffe et al, Land-Use Planning and Development Control: Planning for Air Quality (v1.2), January 2017

Table C5: Impact Descriptors for Individual Receptors				
Long Term Average Concentration at Receptor in Assessment Year*	**Percentage Change in Concentration Relative to Air Quality Assessment Level (AQAL)***			
	1%	**2-5%**	**6-10%**	**>10**
**Percentage pollutant concentrations have been rounded to whole numbers, to make it easier to assess the impact. Changes of 0% (i.e. less than 0.5% or 0.2µg/m^3) should be described as Negligible*				

Determining the Significance of Effects

C.24 Impacts on air quality, whether adverse or beneficial, will have an effect on human health that can be judged as either 'significant' or 'not significant'.

C.25 Once the impact of the proposed development has been assessed for the individual impacts, the overall significance is determined using professional judgement. This takes into account a number of factors such as:

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

Appendix D: Professional Experience of Assessors

D.1 The assessment of air quality impacts, and the significance of the associated effects, takes into account the professional judgement of the assessor. Details of the experience of the personnel involved with the project are provided below:

Dr Matthew Barnes **Senior Environmental**
BSc (Hons), MSc, PhD **Scientist**

Matthew joined Wardell Armstrong in September 2016 as an Air Quality Scientist, following 18 months working as an air quality technical officer in a local authority. Before that he completed a BSc in Environmental Science, an MSc in Environmental Informatics and a PhD in Atmospheric Science, specialising in modelling urban air pollution. The majority of his work is carried out in support of planning applications and, therefore, he has experience of undertaking air quality assessments for a wide range of projects, small and large, including residential developments, commercial developments and mixed-use developments.

Philip Walton **Senior Environmental**
BSc (Hons) AIAQM AIEnvSc **Scientist**

Philip has over five years' experience in the air quality field in both regulatory and consultancy roles, having prepared numerous air quality technical reports and involvement and managing of air quality monitoring schemes.

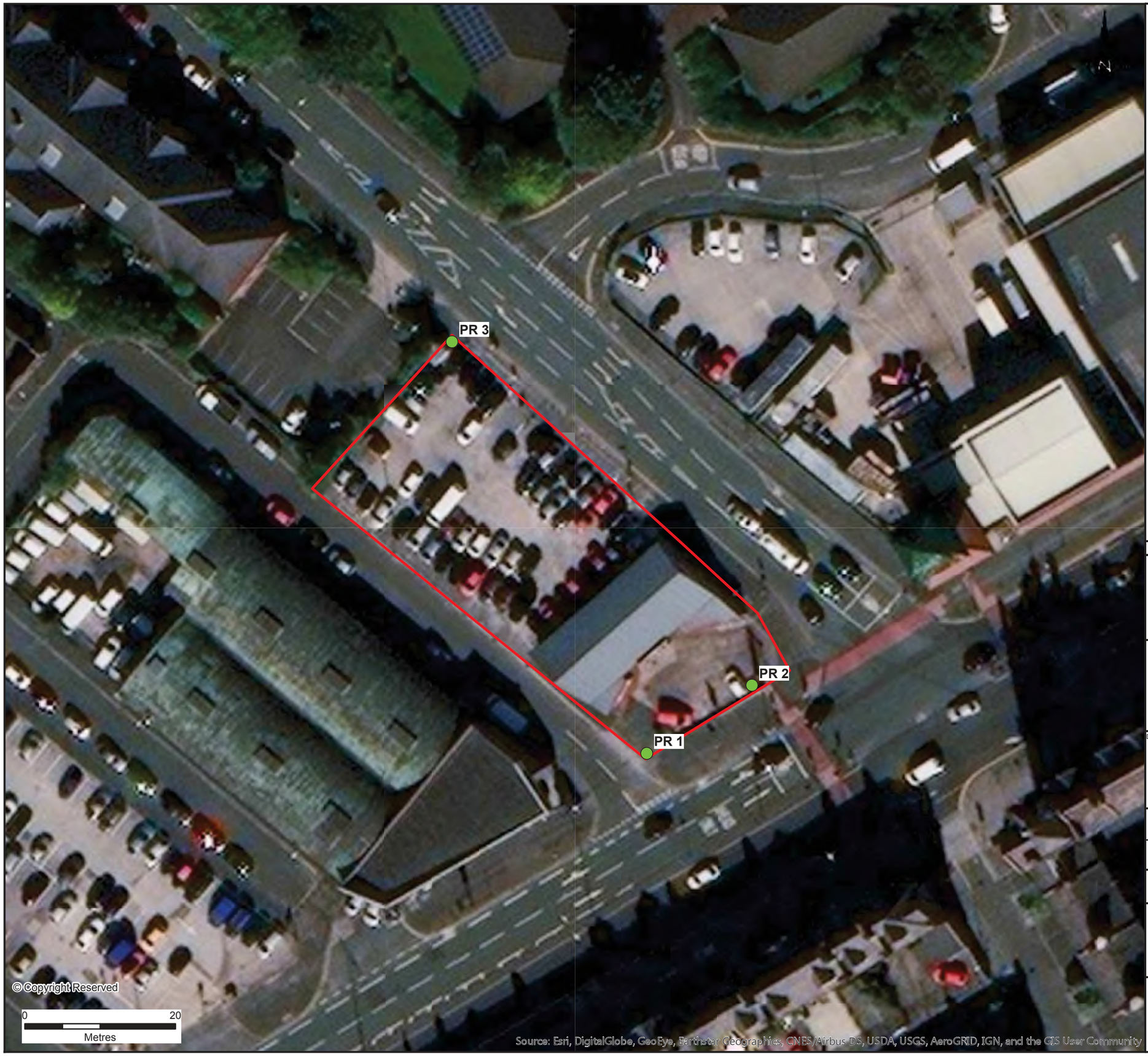
Philip has prepared air quality assessments and environmental statement chapters for developments across the UK for a range of schemes including residential uses in urban and city localities (including developments exceeding 1,000 dwellings), commercial and industrial uses, link roads and quarries. Philip's dust experience includes; preparation of dust management plans for quarries and construction schemes, dust monitoring, dust audits and preparation of the IAQM construction reports. Philip has also prepared several odour reports covering a wide range of odorous sources.

Malcolm Walton **Technical Director**
BSc (Env Health) Dip (Acoustics & Noise Control)
MCIEH AMIOA

Malcolm holds a Bachelor of Science degree in Environmental Health and the Diploma in Acoustics and Noise Control. Malcolm is a Member of the Chartered

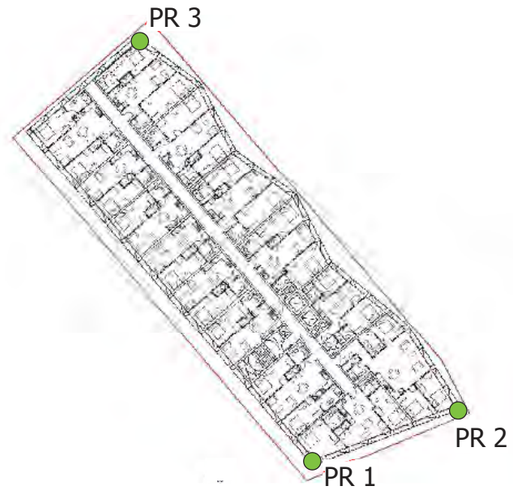
Institute of Environmental Health and an Associate Member of the Institute of Acoustics. Malcolm joined Wardell Armstrong in September 2001 following 12 years working as an Environmental Health Officer in several local authorities, responsible for the enforcement of environmental legislation and in particular air pollution and noise nuisance. Malcolm has experience in the technical co-ordination of environmental appraisal of large schemes to UK and international standards. Malcolm regularly carries out and co-ordinates noise and air quality assessment work associated with planning applications including EIA work and PPC permit application/compliance. He regularly acts as expert witness in planning inquiries in respect of noise, air quality and odour.

Drawing



Key

- Proposed Sensitive Receptors
- Site Boundary



Notes

REVISION	DETAILS	DATE	DRAWN	CHK'D	APP'D

CLIENT

Mulbury Homes (Central) Limited

PROJECT

Bendix Street, Manchester

DRAWING TITLE

Proposed Sensitive Receptor Locations

DRG No		REV
GM10076/001		A
DRG SIZE: A3	SCALE: 1:500	DATE: August 2018
DRAWN BY: EF	CHECKED BY: --	APPROVED BY: --

STOKE-ON-TRENT (HEAD OFFICE)	TEL 0845 111 7777	CARDIFF	TEL 029 2072 9191
		LEIGH	TEL 01942 260101
NEWCASTLE UPON TYNE	TEL 0191 232 0943	SHEFFIELD	TEL 0114 245 6244
WEST BROMWICH	TEL 0121 500 0909	EDINBURGH	TEL 0131 555 3211
LONDON	TEL 020 7287 2872	TAUNTON	TEL 01823 703100

wardell armstrong

wardell-armstrong.com

STOKE-ON-TRENT
Sir Henry Doulton House
Forge Lane
Etruria
Stoke-on-Trent
ST1 5BD
Tel: +44 (0)1782 276 700

BIRMINGHAM
Two Devon Way
Longbridge Technology Park
Longbridge
Birmingham
B31 2TS
Tel: +44 (0)121 580 0909

BOLTON
41-50 Futura Park
Aspinall Way
Middlebrook
Bolton
BL6 6SU
Tel: +44 (0)1204 227 227

CARDIFF
Tudor House
16 Cathedral Road
Cardiff
CF11 9LJ
Tel: +44 (0)292 072 9191

CARLISLE
Marconi Road
Burgh Road Industrial Estate
Carlisle
Cumbria
CA2 7NA
Tel: +44 (0)1228 550 575

EDINBURGH
Great Michael House
14 Links Place
Edinburgh
EH6 7EZ
Tel: +44 (0)131 555 3311

GLASGOW
2 West Regent Street
Glasgow
G2 1RW
Tel: +44 (0)141 433 7210

LEEDS
36 Park Row
Leeds
LS1 5JL
Tel: +44 (0)113 831 5533

LONDON
Third Floor
46 Chancery Lane
London
WC2A 1JE
Tel: +44 (0)207 242 3243

MANCHESTER
76 King Street
Manchester
M2 4NH
Tel: +44 (0)161 817 5038

NEWCASTLE UPON TYNE
City Quadrant
11 Waterloo Square
Newcastle upon Tyne
NE1 4DP
Tel: +44 (0)191 232 0943

TRURO
Baldhu House
Wheal Jane Earth Science Park
Baldhu
Truro
TR3 6EH
Tel: +44 (0)187 256 0738

International offices:

ALMATY
29/6 Satpaev Avenue
Regency Hotel
Office Tower
Almaty
Kazakhstan
050040
Tel: +7(727) 334 1310

MOSCOW
21/5 Kuznetskiy Most St.
Moscow
Russia
Tel: +7(495) 626 07 67

wardell armstrong