

Eliza Yard, Manchester.

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Air Quality Confirmation Statement.

Audit sheet.

Rev.	Date	Description of change / purpose of issue	Prepared	Reviewed	Authorised
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1. Introduction.

This Air Quality Confirmation Statement has been prepared on behalf of Manchester Life Development Company 3 Limited (the 'Applicant'), in support of the variation of a section 73 (minor material amendment) relating to the residential development in Eliza Yard, Manchester (the 'Site'), for a changed number of residential units and alterations to the commercial floor space on the ground floor (the 'Proposal').

The Permitted Scheme, planning reference number 130354/FO/2021, was for 'Erection of an 8 storey building to form 118 residential apartments (Use Class C3) and ground floor commercial floorspace (Use Class E (a),(c),(g)(ii)) (583 sqm) together with amenity space, car and cycle parking provision, hard and soft landscaping, access, servicing and other associated works.' on Eliza Yard, Manchester.

An Air Quality Assessment (AQA) [REP-1012800-BP-5A-20210427-AQA-Eliza Yard Manchester-Rev03] (the 'Previous AQA') was submitted in April 2021 to support the planning application for the Permitted Scheme, for which planning consent was granted on the 11th of May 2021. Since planning permission was granted, amendments to the Permitted Scheme have been proposed. The proposed amendments are summarised as follows:

- Omission of 190 m² commercial use (Class E) on the ground floor;
- Re-organisation of ground floor ancillary spaces;
- Increase from 118 residential apartments to 126 residential apartments (Use Class C3);
- Removal of balconies and introduction of Juliette balconies from ground to seventh floor; and
- Reduced building height.

This Air Quality Confirmation Statement is to be submitted in support of the section 73 application to the Application regarding the Proposal, to confirm that the proposed amendments to the design are not expected to change the conclusions of the Previous AQA. This document should be read in conjunction with the Previous AQA.

2. Changes to Baseline Environment

The Previous AQA used the year 2019 as the baseline year with the inclusion of 2020 and 2021 monitoring data for information purposes only. Since the submission of the Previous AQA, monitoring data from 2022 has now been made available by Manchester City Council (MCC) and it is presented in the most recent Annual Status Report (ASR) 2022¹.

Due to the impacts of the COVID-19 pandemic, monitoring data from the years 2020 and 2021 is not considered representative of 'normal' air quality conditions due to government-imposed lockdowns and has been included for information purposes only. 2022 monitoring data is considered representative and is therefore the most recent year of representative monitoring data (the baseline year). Relevant updates have been made within this section.

2.1 Local Air Quality Monitoring

As stated in the Previous AQA, there is an Automatic Urban and Rural Network (AURN) station located approximately 1.0 km west in Manchester city centre (Site ID: MAN3 and named "Piccadilly Gardens") in an urban centre location that is still in operation. Monitoring data from 2018 to 2022 is now available and presented in Table 1.

Table 1: MAN3 Monitoring Data (2018-2022)

Automatic Monitoring Station ID and distance (km) from Site boundary (approx.)	Air Quality Objective	2018	2019	2020	2021	2022
NO₂						
MAN3 1.0 km	Annual mean (µg/m ³)	35	36	27	30	29
	Number of hours with concentrations > 200 µg/m ³	0	0	0	0	0
PM₁₀						
MAN3 1.0 km	Annual mean (µg/m ³)	21	20	15	15	17
	Number of days with concentrations > 50 µg/m ³	2	7	1	2	4
PM_{2.5}						
MAN3 1.0 km	Annual mean (µg/m ³)	11	12	8	9	10

As shown in Table 1, pollutant concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}) continue to decline from 2019 to 2022 and no exceedances of the respective AQOs for any pollutant were recorded in 2022, the most recent year of representative monitoring data.

Additionally, MCC also utilise passive diffusion tube monitoring locations to monitor annual mean NO₂ concentrations. A review of the most recent monitoring data available indicated that the three passive diffusion tube monitoring locations within 1 km of the Site that were referred to within the Previous AQA. These three passive diffusion tube monitoring locations are still in operation with an additional passive diffusion tube monitoring location (Site ID: MA99BNO) from the MCC ASR 2022¹ located within approximately 1 km of the Application Site. Updated monitoring results are shown in Table 2.

¹ Manchester City Council (2023). 2022 Air Quality Annual Status Report – [online], (Last accessed: 27/03/2024. Available at: https://assets.ctfassets.net/tlpgbvy1k6h2/3eJDZpHcCKNK0ZO7TcUkl/3363e762b28868a832ab2200286a4841/Greater_Manchester_Air_Quality_Annual_Status_Report_2022.pdf

Table 2: Passive Diffusion Tube Monitoring Location Data (2018-2022)

Site ID	Site Type	Distance (km) from Application Site (approx.)	Annual Mean NO ₂ Concentration (µg/m ³)				
			2018	2019	2020	2021	2022
MA99BNO	Roadside	0.4	-	-	26.9	32.9	32.7
MA71NO	Roadside	0.5	46.1	45.3	31.4	34.2	34.4
MA88NO	Kerbside	0.7	44.3	43.3	32.5	35.3	39.2
MA9ANO	Kerbside	0.8	45.8	44.9	32.5	35.7	37.5

Notes:

Data presented in **bold** represents exceedances of the annual mean NO₂ AQO.

From Table 2, no exceedances of the NO annual mean AQO were recorded in 2022, the most recent year of available monitoring data. There has been an improvement in recorded annual mean NO₂ concentrations between 2019 and 2022 from passive diffusion tube monitoring locations within 1 km of the Site.

Furthermore, a review of Defra predicted background concentrations² for the grid square X 385500 Y 398500 in which the Site is located, shows that pollutant Defra predicted background concentrations have reduced from 2019, the baseline year used in the Previous AQA to 2024, the current year for all pollutants.

Table 3: Defra Predicted Background Concentrations from 2019 and 2024 [X 385500 Y 398500]

Year	Defra Predicted Background Concentrations (µg/m ³)		
	NO ₂	PM ₁₀	PM _{2.5}
2019	23.4	12.6	8.3
2024	19.7	11.8	7.8

Defra predicted background concentrations² for 2024, the current year indicate that concentrations for all relevant pollutants are below their respective annual mean AQOs.

Based on the findings above, it is considered that baseline air quality in the vicinity of the Site has improved since the Previous AQA was submitted.

² Defra (2020) Background Pollution Maps – 2018 – [online], (Last accessed: 27/03/2024), Available at: uk-air.defra.gov.uk/data/laqm-background-maps?year=2018

3. Review of Impact Assessment

3.1 Construction Phase

The overall form and position of the building are unchanged from the Permitted Scheme. However alterations to the building massing and height have occurred as a result of proposed amendments included within the Proposal. In addition, the Institute of Air Quality Management (IAQM) construction guidance³ used in the Previous AQA has since been updated, from Version 1.1⁴ to Version 2.2³, to include new thresholds for classifying the dust emission magnitude of construction activities.

Despite changes to the IAQM construction guidance³ thresholds, the dust emission magnitudes for earthworks, construction and trackout activities in addition to the sensitivity of the area from dust soiling and trackout remains the same as in the Previous AQA. Accordingly the risk of construction dust impacts from earthworks, construction and trackout remains the same as in the Previous AQA and as such no changes to the previously identified mitigation measures are required.

Additionally, it should be noted that construction traffic associated with the construction phase is not anticipated to change and the air quality impacts from construction traffic are considered to be insignificant, in line with the Environmental Protection United Kingdom (EPUK) and IAQM planning guidance⁵, as in the Previous AQA.

Therefore, updates to the construction phase assessment are not required.

3.2 Operational Phase

3.2.1 Road Traffic Emissions Screening Assessment

There have been no changes to the on-site car parking provision as part of the Proposal. Additionally, the justification used in the Previous AQA regarding minimal servicing trips and an overall net decrease in road vehicle trips associated with the Development when compared to the existing use are still considered to be valid. As a result, the air quality impacts of operational phase road traffic are considered to be below the criteria in the EPUK and IAQM planning guidance⁵ and no further assessment is required.

Therefore, the conclusions of the road traffic emissions impact assessment remain the same as the Previous AQA, no changes to identified mitigation measures will be required and accordingly no updates to the road traffic emissions screening assessment are required.

3.2.2 Site Suitability Assessment

Previously in the Permitted Scheme, the long term AQOs applied to every floor of the Development apart from the ground floor. This was due to the complete commercial use located on ground floor for which only the short term AQOs applied.

As part of the proposed amendments for the Permitted Scheme, 190 m² of commercial uses on the ground floor have been omitted and replaced with residential uses. As such, the long term AQOs now apply to the Development in its entirety.

From the Previous AQA, long term and short term AQOs were already evaluated within the Site Suitability Assessment for the proposed mixed use which also contained both residential and commercial uses and the Site was considered suitable for a proposed mixed use without the need for additional mitigation

³ Institute of Air Quality Management (2024) Guidance on the assessment of dust from demolition and construction v2.2 – [online], (Last accessed: 28/03/2024), Available at: [Construction-dust-2023-BG-v6-amendments.pdf](https://www.iaqm.co.uk/text/guidance/construction-dust-2023-BG-v6-amendments.pdf) (iaqm.co.uk)

⁴ Institute of Air Quality Management (2016), IAQM Guidance on the Assessment of Dust from Demolition and Construction version 1.1 – [online] (Last accessed: 28/03/2024), Available: www.iaqm.co.uk/text/guidance/construction-dust-2014.pdf

⁵ Environmental Protection UK and Institute of Air Quality Management (2017), Land-Use Planning & Development Control: Planning For Air Quality v1.2 – [online] (Last accessed: 28/03/2024), Available at: [iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf](https://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf)



measures. Since the proposed use will again consist of residential and commercial uses, the Site can still be considered suitable for the proposed mixed use.

In addition, the updated baseline review has confirmed that monitored concentrations of pollutants NO_2 , PM_{10} and $\text{PM}_{2.5}$ recorded at automatic monitoring stations and passive diffusion tube monitoring locations in 2022, the baseline year are lower than the concentrations reported in 2019 from the Previous AQA. Therefore, pollutant concentrations of NO_2 , PM_{10} and $\text{PM}_{2.5}$ at the Site are likely to be lower in 2022 compared to 2019.

As such, the conclusions of the Site Suitability assessment within the Previous AQA remain valid, as a worst-case scenario, and the Site remains suitable for the proposed residential use. Therefore, updates to Site Suitability assessment are not required.

4. Summary and Conclusions

The Previous AQA was submitted in April 2021 to support the planning application for the Permitted Scheme (Ref: 130354/FO/2021) at Eliza Yard, Manchester. Planning permission was granted for the Permitted Scheme in May 2021. However due to both the elapsed time since the submission of the Previous AQA and the amendments proposed to the Permitted Scheme, a review of more up to date air quality information has been undertaken along with a discussion of the potential implications of the Proposal on local air quality.

A review of updated baseline air quality conditions has been carried out and has confirmed that the conclusions of the Previous AQA remain the same and pollutant concentrations of NO₂, PM₁₀ and PM_{2.5} are not in exceedance of their respective AQOs from 2022 monitoring data.

Furthermore, the construction phase impacts and operational phase impacts (i.e. road traffic emission screening impact and Site Suitability Assessment) conclusions from the Previous AQA have remained unchanged and no changes to the previously identified mitigation measures will be necessary.

Based on these findings, the Proposal is expected to lead to no worsening of air quality impacts. The Previous AQA remains valid in terms of air quality and no further assessment of impacts is required.