Air Quality Assessment
White Moss Road
(VASA Club)
Blackley

Reference: Z71708

Client: Chapter WBL Ltd

&

Jigsaw Homes Group

Date: 1st October2026





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Executive Summary

Energy Counsel was commissioned by Chapter WBL Ltd. to undertake an Air Quality Assessment in support of a residential development at White Moss Road, Blackley.

An Air Quality Assessment was undertaken to:

- Assess potential impacts associated with fugitive dust emissions during the construction phase of the proposed development;
- Assess potential impacts associated with road transport emissions during the operational phase of the proposed development;
- Assess risk of future resident exposure to any existing air quality issues; and,
- Identify any requirement for relevant mitigation measures.

Potential construction phase impacts from fugitive dust emissions were assessed as a result of demolition, earthworks, construction and trackout activities. It is considered that the use of the identified site-specific control measures would provide suitable mitigation for a development of this size and nature and reduce potential impacts to an acceptable level.

Potential impacts during the operational phase of the proposals may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the site. These were assessed using standard screening criteria. Due to the low number of vehicle trips generated by the proposals, road traffic exhaust impacts were not predicted to be significant

The potential for exposure of future residents to elevated pollution levels was assessed based on the findings of a desk top study. This indicated that pollutant concentrations are likely to be below the relevant criteria at the development location. As such, the site is considered suitable for the proposed use from an air quality perspective.

Manchester City Council's Air Quality and Planning Technical Guidance was also considered within the assessment. The development was classified in accordance with the document and the appropriate level of mitigation required for the scheme identified.

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

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1.0 INTRODUCTION

1.1 Instruction

1.1.1 Energy Counsel was commissioned by Chapter WBL Ltd. to undertake an Air Quality Assessment in support of a residential development at White Moss Road, Blackley.

1.2 Site Location and Context

1.2.1 The proposed development is located at White Moss Road, Blackley, at approximate National Grid Reference (NGR): 386060, 403350. The relevant Local Authority (LA) is Manchester City Council (MCC). Reference should be made to Figure 1 for a map of the site and surrounding area.

1.2.2 The proposals comprise the demolition of existing structures on site and subsequent construction of 43 apartments with associated works.

1.3 Assessment Scope

1.3.1 The proposals have the potential to cause air quality impacts at sensitive locations. As such, an Air Quality Assessment was undertaken to:

- Assess potential impacts associated with fugitive dust emissions during the construction phase of the development;
- Assess potential impacts associated with road transport emissions during the operational phase of the development;
- Assess risk of future resident exposure to any existing air quality issues; and,
- Identify any requirement for relevant mitigation measures.

1.3.2 This is detailed in the following report.

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2.0 LEGISLATION AND POLICY

2.1 Legislation

2.1.1 The Air Quality Standards Regulations (2010) and subsequent amendments include Air Quality Limit Values (AQLVs) for the following pollutants:

- Nitrogen dioxide (NO_2);
- Sulphur dioxide;
- Lead;
- Particulate matter with an aerodynamic diameter of less than 10µm (PM_{10});
- Particulate matter with an aerodynamic diameter of less than 2.5µm ($PM_{2.5}$);
- Benzene; and,
- Carbon monoxide.

2.1.2 Air Quality Target Values were also provided for several additional pollutants. It should be noted that the AQLV for $PM_{2.5}$ stated in the Air Quality Standards Regulations (2010) was amended in the Environment (Miscellaneous Amendments) (EU Exit) Regulations (2020).

2.1.3 The Air Quality Strategy (AQS) was produced by the Department for Environment, Food and Rural Affairs (DEFRA) and published on 28th April 2023[1]. The document contains standards, objectives and measures for improving ambient air quality, including a number of Air Quality Objectives (AQOs). These are maximum ambient pollutant concentrations that are not to be exceeded either without exception or with a permitted number of exceedences over a specified timescale. These are generally in line with the AQLVs, although the requirements for the determination of compliance vary.

2.1.4 The Environmental Improvement Plan 2025[2] was published in December 2025, providing long term and Interim Targets in order to reduce population exposure to $PM_{2.5}$. The Concentration Target for 2040 was adopted in the Environmental Targets (Fine Particulate Matter) (England) Regulations (2023).

1 AQS: Framework for Local Authority Delivery, DEFRA, 2023.

2 Environmental Improvement Plan 2025, DEFRA, 2025.

2.1.5 Table 1 presents the AQOs, Interim Target and Concentration Target for pollutants considered within this assessment.

Table 1 Air Quality Objectives/ Interim Target/ Concentration Target

Pollutant	Air Quality Objective/ Interim Target/ Concentration Target	
	Concentration (µg/m³)	**Averaging Period**
NO_2	40	Annual mean
	200	1-hour mean, not to be exceeded on more than 18 occasions per annum
PM_{10}	40	Annual mean
	50	24-hour mean, not to be exceeded on more than 35 occasions per annum
$PM_{2.5}$	10(a)	Annual mean
	10(b)	Annual mean

Note: (a) Interim Target to be achieved by 2030.
(b) Concentration Target to be achieved by 2040.

2.1.6 Table 2 summarises the advice provided in DEFRA guidance[3] on where the AQOs for pollutants considered within this report apply.

Table 2 Examples of Where the Air Quality Objectives Apply

Averaging Period	Objective Should Apply At	Objective Should Not Apply At
Annual mean	All locations where members of the public might be regularly exposed Building façades of residential properties, schools, hospitals, care homes etc.	Building façades of offices or other places of work where members of the public do not have regular access Hotels, unless people live there as their permanent residence Gardens of residential properties Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term

3 Local Air Quality Management Technical Guidance (TG22), DEFRA, 2022.

Averaging Period	Objective Should Apply At	Objective Should Not Apply At
24-hour mean	All locations where the annual mean objective would apply, together with hotels Gardens of residential properties	Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term
1-hour mean	All locations where the annual mean and 24 and 8-hour mean objectives apply. Kerbside sites (for example, pavements of busy shopping streets) Those parts of car parks, bus stations and railway stations etc which are not fully enclosed, where members of the public might reasonably be expected to spend one hour or more Any outdoor locations where members of the public might reasonably be expected to spend one hour or longer	Kerbside sites where the public would not be expected to have regular access

2.2 Local Air Quality Management

2.2.1 LAs are required to periodically review and assess air quality within their area of jurisdiction under the system of Local Air Quality Management (LAQM). This review and assessment of air quality involves comparing present and likely future pollutant concentrations against the AQOs. If it is predicted that levels at locations of relevant exposure, as summarised in Table 2, are likely to be exceeded, the LA is required to declare an Air Quality Management Area (AQMA). For each AQMA the LA is required to produce an Air Quality Action Plan, the objective of which is to reduce pollutant concentrations in pursuit of the AQOs.

2.3 Dust

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

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

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2.3.2 Enforcement of the Act, in regard to nuisance, is currently under the jurisdiction of the local Environmental Health Department, whose officers are deemed to provide an independent evaluation of nuisance. If the LA is satisfied that a statutory nuisance exists, or is likely to occur or happen again, it must serve an Abatement Notice under Part III of the Environmental Protection Act (1990). The only defence is to show that the process to which the nuisance has been attributed and its operation are being controlled according to best practicable means.

2.4 National Planning Policy Framework

2.4.1 The National Planning Policy Framework[4] (NPPF) was published in August 2026. The document sets out the Government's planning policies for England and how these are expected to be applied.

2.4.2 The purpose of the planning system is to contribute to the achievements of sustainable development. In order to ensure this, the NPPF recognises three overarching objectives including the following of relevance to air quality:

> "c) an environmental objective - to support efforts to mitigate and adapt to climate change, including moving to a low carbon economy; and to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, and minimising waste and pollution."

2.4.3 The NPPF provides the following plan-making policies of relevance to air quality:

- P1: Planning for clean and safe places, paragraph 1b; and,
- P3: Living conditions and pollution, paragraph 1 and 2.

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

4 NPPF, Ministry of Housing, Communities and Local Government, 2026.

2.5 National Planning Practice Guidance

2.5.1 The National Planning Practice Guidance[5] (NPPG) web-based resource was launched by the Department for Communities and Local Government to support the NPPF and make it more accessible. The air quality pages are summarised under the following headings:

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

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

2.6 Regional Planning Policy

2.6.1 The Places for Everyone Plan (PfEP)[6] was produced by the Greater Manchester Combined Authority (GMCA) and became part of the statutory development plan for each of the relevant LAs on 21st March 2024.

2.6.2 A review of the PfEP indicated the following policies of relevance to air quality that have been considered throughout this assessment:

> "Policy JP:S5: Clean Air
>
> A comprehensive range of measures will be taken to support improvements in air quality, focusing particularly on locations where people live, where children learn and play, where there are impacts on the green infrastructure network and where air quality targets are not being met, including:

5 https://www.gov.uk/guidance/air-quality--3.

6 PfEP, GMCA, 2024.

1. Locating and designing development, and focusing transport investment, so as to reduce reliance on forms of transport that generate air pollution;

2. Determining planning applications having regard to the most recent development and planning control guidance published jointly by the Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK), and the most recent IAQM Guidance on the Assessment of Dust from Demolition and Construction, or relevant successor guidance, including the requirement for developers to submit construction management plans as appropriate;

3. Requiring applications for developments that could have an adverse impact on air quality to submit relevant air pollution data so that adverse impacts on air quality can be fully assessed and development only permitted where they are acceptable and/or suitable mitigation can be provided;

4. Restricting developments that would generate significant point source pollution such as some types of industrial activity and energy generation;

5. Significantly expanding the existing commercial network of electric vehicle charging points, both for public and private use, including as part of new developments;

6. Implementing the Clean Air Plan and associated measures;

7. Facilitating the more sustainable distribution of goods within the urban area, including through accommodating urban consolidation centres and urban distribution centres that use ultra-low-emission vehicles, and local delivery facilities to reduce repeat delivery attempts;

8. Designing streets to avoid trapping air pollution at ground level, including through the appropriate location and scale of buildings and trees;

9. Controlling traffic and parking within and around schools, early years sites and other locations that are particularly sensitive to air quality;

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10. Promoting actions that help remove pollutants from the air, such as enhancing the green infrastructure network and using innovative building materials that capture air pollutants; and,

11. Development should be located in areas that maximise the use of sustainable travel modes and be designed to minimise exposure to high levels of air pollution, particularly for vulnerable users."

"Policy JP-P1 Sustainable Places

We aim to become one of the most liveable city regions in the world, consisting of a series of beautiful, healthy and varied places, each having the following key attributes that all development, wherever appropriate, should be consistent with:

[…]

15. Comfortable and inviting, with indoor and outdoor environments:

A. Offering a high level of amenity that minimises exposure to pollution; and,

[…]."

2.6.1 The above policies were considered as necessary throughout the undertaking of the assessment.

2.7 Local Planning Policy

2.7.1 The Manchester Local Development Framework consists of a series of planning documents of which the Core Strategy Development Plan Document (DPD)[7] is central. This was adopted by MCC on 11th July 2012.

2.7.2 Review of the Core Strategy DPD indicated the following policies of relevance to the assessment:

"Policy DM 1

[7] Core Strategy DPD, MCC, 2012.

Development Management

All development should have regard to the following specific issues for which more detailed guidance may be given within a supplementary planning document:

[…]

Effects on amenity, including privacy, light, noise, vibration, air quality, odours, litter, vermin, birds, road safety and traffic generation. This could also include proposals which would be sensitive to existing environmental conditions, such as noise."

"Policy EN 16

Air Quality

The Council will seek to improve the air quality within Manchester."

2.7.3 It should be noted that MCC issued an addendum to the Core Strategy[8] in 2024. This confirms that the remaining text of Policy EN16 has been superseded by PfE Policy JP-S5, as referenced in Section 2.6.

2.7.4 MCC has also produced the 'Air Quality & Planning Technical Guidance' Document[9] which provides guidance on assessing the impact of proposed development on air quality.

2.7.5 The above policies and guidance were taken into consideration throughout the undertaking of the assessment.

2.8 Greater Manchester Clean Air Plan

2.8.1 The UK Government has instructed a number of LAs to take rapid action to reduce harmful roadside levels of NO_2 within their areas of jurisdiction in the quickest possible timeframe. The GMCA and Transport for Greater Manchester (TfGM) have collaborated

8 Addendum to Manchester Core Strategy 2024, MCC, 2024.

9 Air Quality & Planning Technical Guidance, MCC, 2022.

to develop a Clean Air Plan (CAP) to ensure Greater Manchester achieves compliance with the relevant AQOs for NO_2 by 2026 at the latest. The initial CAP proposal included implementation of a Class C charging Clean Air Zone. The GMCA has subsequently updated the CAP proposals to comprise an investment-led, non-charging approach. This was approved by the UK Government on 23rd January 2025. The implications of the CAP were taken into account during the undertaking of this assessment.

3.0 METHODOLOGY

3.1 Introduction

3.1.1 The proposed development has the potential to cause air quality impacts during the construction and operational phases, as well as expose future residents to any existing air quality issues. These have been assessed in accordance with the following methodology.

3.2 Construction Phase Assessment

3.2.1 There is the potential for fugitive dust emissions to occur as a result of construction phase activities. These have been assessed in accordance with the methodology outlined within the Institute of Air Quality Management (IAQM) document 'Guidance on the Assessment of Dust from Demolition and Construction V2.2'[10].

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

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

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

- Annoyance due to dust soiling;
- Harm to ecological receptors; and,
- The risk of health effects due to a significant increase in exposure to PM_{10}.

3.2.4 The assessment steps are detailed below.

10 Guidance on the Assessment of Dust from Demolition and Construction V2.2, IAQM, 2024.

Step 1 - Screen the Need for an Assessment

3.2.5 Step 1 screens the requirement for a more detailed assessment. Should human receptors be identified within 250m from the boundary or 50m from the construction vehicle route up to 250m from the site entrance, then the assessment proceeds to Step 2. Additionally, should ecological receptors be identified within 50m of the site or the construction vehicle route up to 250m from the site entrance, then the assessment also proceeds to Step 2.

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

Step 2 - Assess the Risk of Dust Impacts

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

- The scale and nature of the works, which determines the magnitude of dust arising as: small, medium or large (Step 2A); and,
- The sensitivity of the area to dust impacts, which can be defined as low, medium or high sensitivity (Step 2B).

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

3.2.9 Step 2A defines the potential magnitude of dust emission through the construction phase. The relevant criteria are summarised in Table 3.

Table 3 Construction Dust - Magnitude of Emission

Magnitude	Activity	Criteria
Large	Demolition	• Total building volume greater than 75,000m^3 • Potentially dusty construction material (e.g. concrete) • On-site crushing and screening • Demolition activities more than 12m above ground level

Magnitude	Activity	Criteria
	Earthworks	• Total site area greater than 110,000m^2 • Potentially dusty soil type (e.g. clay, which will be prone to suspension when dry due to small particle size) • More than 10 heavy earth moving vehicles active at any one time • Formation of bunds greater than 6m in height
	Construction	• Total building volume greater than 75,000m^3 • On site concrete batching • Sandblasting
	Trackout	• More than 50 Heavy Duty Vehicle (HDV) trips per day • Potentially dusty surface material (e.g. high clay content) • Unpaved road length greater than 100m
Medium	Demolition	• Total building volume between 12,000m^3 and 75,000m^3 • Potentially dusty construction material • Demolition activities between 6m and 12m above ground level
	Earthworks	• Total site area between 18,000m^2 and 110,000m^2 • Moderately dusty soil type (e.g. silt) • 5 to 10 heavy earth moving vehicles active at any one time • Formation of bunds 3m to 6m in height
	Construction	• Total building volume between 12,000m^3 and 75,000m^3 • Potentially dusty construction material (e.g. concrete) • On site concrete batching
	Trackout	• 20 to 50 HDV trips per day • Moderately dusty surface material (e.g. high clay content) • Unpaved road length 50m to 100m
Small	Demolition	• Total building volume less than 12,000m^3 • Construction material with low potential for dust release (e.g. metal cladding or timber) • Demolition activities less than 6m above ground • Demolition during wetter months
	Earthworks	• Total site area less than 18,000m^2 • Soil type with large grain size (e.g. sand) • Less than 5 heavy earth moving vehicles active at any one time • Formation of bunds less than 3m in height

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Magnitude	Activity	Criteria
	Construction	• Total building volume less than 12,000m^3 • Construction material with low potential for dust release (e.g. metal cladding or timber)
	Trackout	• Less than 20 HDV trips per day • Surface material with low potential for dust release • Unpaved road length less than 50m

3.2.10 Step 2B defines the sensitivity of the area around the development to potential dust impacts. The sensitivities of specific receptors are summarised in Table 4.

Table 4 Construction Dust - Sensitivities of People and Ecological Receptors

Receptor Sensitivity	Examples	
	Human Receptors	**Ecological Receptors**
High	• Users expect high levels of amenity • High aesthetic or value property • People expected to be present continuously for extended periods of time • Locations where members of the public are exposed over a time period relevant to the AQO for PM_{10}. e.g. residential properties, hospitals, schools and residential care homes	• Internationally or nationally designated site e.g. Special Area of Conservation
Medium	• Users would expect to enjoy a reasonable level of amenity • Aesthetics or value of their property could be diminished by soiling • People or property wouldn't reasonably be expected to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land e.g. parks and places of work	• Nationally designated site e.g. Sites of Special Scientific Interest
Low	• Enjoyment of amenity would not reasonably be expected • Property would not be expected to be diminished in appearance • Transient exposure, where people would only be expected to be present for limited periods. e.g. public footpaths, playing fields, shopping streets, farmland, short term car parks and roads	• Locally designated site e.g. Local Nature Reserve

3.2.11 The criteria for determining the sensitivity of the area to dust soiling effects on people and property is summarised in Table 5.

Table 5 Construction Dust - Sensitivity of the Area to Dust Soiling Effects on People and Property

Receptor Sensitivity	Number of Receptors	Distance from the Source (m)			
		Less than 20	Less than 50	Less than 100	Less than 250
High	More than 100	High	High	Medium	Low
	10 - 100	High	Medium	Low	Low
	1 - 10	Medium	Low	Low	Low
Medium	More than 1	Medium	Low	Low	Low
Low	More than 1	Low	Low	Low	Low

3.2.12 Table 6 outlines the criteria for determining the sensitivity of the area to human health impacts.

Table 6 Construction Dust - Sensitivity of the Area to Human Health Impacts

Receptor Sensitivity	Background Annual Mean PM_{10} Concentration	Number of Receptors	Distance from the Source (m)			
			Less than 20	Less than 50	Less than 100	Less than 250
High	Greater than 32µg/m^3	More than 100	High	High	High	Medium
		10 - 100	High	High	Medium	Low
		1 - 10	High	Medium	Low	Low
	28 - 32µg/m^3	More than 100	High	High	Medium	Low
		10 - 100	High	Medium	Low	Low
		1 - 10	High	Medium	Low	Low
	24 - 28µg/m^3	More than 100	High	Medium	Low	Low
		10 - 100	High	Medium	Low	Low
		1 - 10	Medium	Low	Low	Low
	Less than 24µg/m^3	More than 100	Medium	Low	Low	Low
		10 - 100	Low	Low	Low	Low

Receptor Sensitivity	Background Annual Mean PM_{10} Concentration	Number of Receptors	Distance from the Source (m)			
			Less than 20	Less than 50	Less than 100	Less than 250
		1 - 10	Low	Low	Low	Low
Medium	Greater than 32µg/m^3	More than 10	High	Medium	Low	Low
		1 - 10	Medium	Low	Low	Low
	28 - 32µg/m^3	More than 10	Medium	Low	Low	Low
		1 - 10	Low	Low	Low	Low
	24 - 28µg/m^3	More than 10	Low	Low	Low	Low
		1 -10	Low	Low	Low	Low
	Less than 24µg/m^3	More than 10	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low
Low	-	1 or more	Low	Low	Low	Low

3.2.13 Table 7 outlines the criteria for determining the sensitivity of the area to ecological impacts.

Table 7 Construction Dust - Sensitivity of the Area to Ecological Impacts

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

3.2.14 Step 2C combines the dust emission magnitude with the sensitivity of the area to determine the risk of unmitigated impacts.

3.2.15 Table 8 outlines the risk category from demolition activities.

Table 8 Construction Dust - Dust Risk Category from Demolition Activities

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

3.2.16 Table 9 outlines the risk category from earthworks, construction and trackout activities.

Table 9 Construction Dust - Dust Risk Category from Earthworks, Construction and Trackout Activities

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

Step 3 - Site-specific Mitigation

3.2.17 Step 3 requires the identification of site-specific mitigation measures within the IAQM guidance[11] to reduce potential dust impacts based upon the relevant risk categories identified in Step 2. For sites with **negligible** risk, mitigation measures beyond those required by legislation are not required. However, additional controls may be applied as part of good practice.

Step 4 - Determine Significant Effects

3.2.18 Once the risk of dust impacts has been determined and the appropriate mitigation measures identified, the final step is to determine the significance of any residual impacts. For almost all construction activity, the aim should be to control effects through the use of

11 Guidance on the Assessment of Dust from Demolition and Construction V2.2, IAQM, 2024.

effective mitigation. Experience shows that this is normally possible. Hence the residual effect will normally be **not significant**.

3.2.19 The determination of significance relies on professional judgement and reasoning should be provided as far as practicable. The IAQM guidance[12] suggests the provision of details of the assessor's qualifications and experience. These are provided in Appendix 1.

3.3 Operational Phase Assessment

Potential Development Impacts

3.3.1 The development has the potential to increase concentrations of NO_2, PM_{10} and $PM_{2.5}$ as a result of road traffic exhaust emissions associated with vehicles travelling to and from the site during the operational phase. An assessment was therefore undertaken using the criteria contained within the IAQM 'Land-Use Planning & Development Control: Planning for Air Quality'[13] guidance to determine the potential for trips generated by the development to affect local air quality.

3.3.2 The following criteria are provided to help establish when an assessment of potential impacts on the local area is likely to be considered necessary:

- The development leads to a change of Light Duty Vehicle (LDV) flows of:
  - More than 100 Annual Average Daily Traffic (AADT) within an AQMA;
  - More than 500 AADT outside of an AQMA;
- The development leads to a change of HDV flows of:
  - More than 25 AADT within an AQMA;
  - More than 100 AADT outside of an AQMA;
- Introduce a new junction that would cause traffic flow to change behaviour with respect to acceleration/deceleration or introduce queueing traffic where there previously wasn't any (such as a roundabout or traffic lights); and,
- Introduce one or more significant combustion processes where there is a risk of impact to relevant receptors.

12 Guidance on the Assessment of Dust from Demolition and Construction V2.2, IAQM, 2024.

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

3.3.3 Should these criteria not be met, then the IAQM guidance[14] considers air quality impacts associated with a scheme to be **not significant** and no further assessment is required.

Potential Future Exposure

3.3.4 The proposed development comprises residential land use. This is considered a location of relevant exposure for long and short term AQOs in accordance with DEFRA guidance[15], as shown in Table 2. Existing air quality conditions at the site were therefore assessed through consideration of AQMA designations, local monitoring results and background concentrations. The findings were subsequently used to determine the potential for exceedences of the relevant AQO and Concentration Target at the development location.

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

15 Local Air Quality Management Technical Guidance (TG22), DEFRA, 2022.

4.0 BASELINE

4.1 Introduction

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

4.2 Local Air Quality Management

4.2.1 As required by the Environment Act (1995), as amended by the Environment Act (2021), MCC has undertaken Review and Assessment of air quality within its area of jurisdiction. This process has indicated that annual mean concentrations of NO_2 are above the AQO within the city. As such, a number of roads within Manchester have been included within the GMCA AQMA. This is described as follows:

> "This is the part of the Greater Manchester Combined Authority AQMA located within the Manchester City Council area."

4.2.2 The site is located adjacent to the AQMA. As such, there is the potential for emissions associated with the development to increase pollution levels in this sensitive area, as well as the exposure of future users to poor air quality. This has been considered throughout the assessment.

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

4.3 Air Quality Monitoring

4.3.1 Monitoring of pollutant levels is undertaken by MCC throughout its area of jurisdiction. Data has also been collected by the GMCA to inform the CAP. Recent NO_2 concentrations recorded in the vicinity of the development, as provided in GMCA's '2025 Air Quality Annual Status Report (ASR)'[16], are shown in Table 10.

16 2025 Air Quality ASR, GMCA, 2025.

Table 10 Monitoring Results

Monitor		Annual Mean NO_2 Concentration (µg/m³)		
		2023	2024	2025
MA101BNO	Rochdale Rd, Harpurhey	34.9	32.1	30.6
MA102BNO	1133 Rochdale Rd, Charlestown	32.2	27.6	24.2

4.3.2 As shown in Table 10, annual mean NO_2 concentrations were below the AQO of 40µg/m³ at all monitors during recent years. Reference should be made to Figure 2 for a map of the survey position.

4.3.3 MCC does not undertake monitoring of PM_{10} or $PM_{2.5}$ emissions in the vicinity of the site.

4.4 Background Pollutant Concentrations

4.4.1 Predictions of background pollutant concentrations on a 1km by 1km grid basis have been produced by DEFRA for the entire of the UK to assist LAs in their Review and Assessment of air quality. The proposed development site is located in grid square NGR: 386500, 403500. Data for this location was downloaded from the DEFRA website[17] for the purpose of the assessment and is summarised in Table 11.

Table 11 Background Pollutant Concentration Predictions

Pollutant	Predicted 2026 Background Pollutant Concentration (µg/m³)
NO_2	13.36
PM_{10}	13.04
$PM_{2.5}$	7.56

4.4.2 As shown in Table 11, predicted background NO_2, PM_{10} and $PM_{2.5}$ concentrations are below the relevant AQOs and Concentration Target at the development site.

17 http://uk-air.defra.gov.uk/data/laqm-background-maps?year=2021.

4.5 Sensitive Receptors

4.5.1 A sensitive receptor is defined as any location which may be affected by changes in air quality as a result of a development. Receptors sensitive to potential dust impacts during demolition, earthworks and construction were identified from a desk-top study of the area up to 250m from the development boundary. These are summarised in Table 12.

Table 12 Demolition, Earthworks and Construction Dust Sensitive Receptors

Distance from Site Boundary (m)	Approximate Number of Human Receptors			Approximate Number of Ecological Receptors
	Low Sensitivity Receptors	Medium Sensitivity Receptors	High Sensitivity Receptors	
Up to 20	More than 1	1 - 10	1 - 10	0
Up to 50	More than 1	More than 10	10 - 100	0
Up to 100	More than 1	More than 10	More than 100	-
Up to 250	More than 1	More than 10	More than 100	-

4.5.2 Receptors sensitive to potential dust impacts from trackout were identified from a desk-top study of the area up to 50m from the road network within 250m of the site access. These are summarised in Table 13.

Table 13 Trackout Dust Sensitive Receptors

Distance from Site Access Route (m)	Approximate Number of Human Receptors			Approximate Number of Ecological Receptors
	Low Sensitivity Receptors	Medium Sensitivity Receptors	High Sensitivity Receptors	
Up to 20	More than 1	1 - 10	10 - 100	0
Up to 50	More than 1	More than 1	More than 100	0

4.5.3 There are no ecological receptors within 50m of the development boundary or the access route within 250m of the site entrance. As such, ecological impacts have not been assessed further within this report.

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5.0 CONSTRUCTION PHASE ASSESSMENT

5.1 Introduction

5.1.1 There is the potential for air quality impacts as a result of the construction of the proposed development. These are assessed in the following Sections.

5.2 Step 1 - Screen the Need for an Assessment

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

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

5.2.3 The desk-study undertaken to inform the baseline identified a number of sensitive receptors within 250m of the site boundary. As such, a detailed assessment of potential dust impacts was required.

5.3 Step 2a - Define the Potential Dust Emission Magnitude

Demolition

5.3.1 Demolition will be undertaken at the start of the construction phase and will involve removing the existing building on site. The total building volume to be demolished is anticipated to be less than 12,000m^3. In accordance with the criteria outlined in Table 3, the magnitude of emissions from demolition is therefore **small**.

Earthworks

5.3.2 Earthworks will primarily involve excavating material, haulage, tipping and stockpiling, as well as site levelling and landscaping. The area of the proposed development site is less

than 18,000m^2. In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from earthworks is therefore **small**.

Construction

5.3.3 Due to the size of the development, the total building volume to be constructed will be below 12,000m^3. In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from construction is therefore **small**.

Trackout

5.3.4 Due to the provision of existing hard standing, the unpaved road length will be less than 50m. In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from trackout is therefore **small**.

5.4 Define the Sensitivity of the Area

Dust Soiling

5.4.1 The sensitivity of the area with respect to dust soiling from demolition, earthworks and construction was defined based on the number of receptors shown in Table 12 using the criteria summarised in Table 5. This indicated a sensitivity classification of **medium**.

5.4.2 The sensitivity of the area with respect to dust soiling from trackout was defined based on the number of receptors shown in Table 13 using the criteria summarised in Table 5. This indicated a sensitivity classification of **high**.

Human Health

5.4.3 Table 11 shows the annual mean PM_{10} background concentration at the site is 13.04µg/m^3. Using the criteria in Table 6 and the number of receptors shown in Table 12, the sensitivity of the area with respect to human health from demolition, earthworks and construction was classified as **low**.

5.4.4 Using the criteria in Table 6 and the number of receptors shown in Table 13, the sensitivity of the area with respect to human health from trackout was classified as **low**.

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5.5 Step 2c - Define the Risk of Dust Impacts

5.5.1 The derived dust emission magnitude for each activity has been combined with the sensitivity of the area to determine the risk of unmitigated impacts in line with the methodology set out in Table 8 and Table 9. A summary of the risk from each dust generating activity is provided in Table 14.

Table 14 Summary of Potential Unmitigated Dust Risks

Potential Impact	Activity	Step 2A - Dust Emission Magnitude	Step 2B - Sensitivity of the Area	Step 2C - Risk
Dust Soiling	Demolition	Small	Medium	Low
	Earthworks	Small	Medium	Low
	Construction	Small	Medium	Low
	Trackout	Small	High	Low
Human Health	Demolition	Small	Low	Negligible
	Earthworks	Small	Low	Negligible
	Construction	Small	Low	Negligible
	Trackout	Small	Low	Negligible

5.5.2 As indicated in Table 14, the potential risk of dust soiling is **low** from demolition, earthworks, construction and trackout. The potential risk of human health impacts is **negligible** from demolition, earthworks, construction and trackout.

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

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5.6 Step 3 - Site-specific Mitigation

5.6.1 The IAQM guidance[18] provides potential mitigation measures to reduce impacts as a result of fugitive dust emissions during the construction phase. These have been adapted for the development site as summarised in Table 15. These may be reviewed prior to the commencement of construction works and will be incorporated into a Construction Environmental Management Plan.

Table 15 Fugitive Dust Emission Mitigation Measures

Issue	Control Measure
Communications	• 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
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 the complaints log available to the LA upon request • Record any exceptional incidents that cause dust and/or air emissions, either on- or off- site, and the action taken to resolve the situation in the log book
Monitoring	• Carry out regular site inspections, record inspection results, and make an inspection log available to the LA upon request • Increase the frequency of site inspections when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions
Site preparation	• Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible • Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site • Avoid site runoff of water or mud
Operating vehicle/machinery and sustainable travel	• Ensure all vehicles 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

18 Guidance on the Assessment of Dust from Demolition and Construction V2.2, IAQM, 2024.

Issue	Control Measure
Operations	• Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques • Ensure an adequate water supply on the site for effective dust suppression, using non-potable water where possible and appropriate • Use enclosed chutes and conveyors and covered skips • Minimise drop heights and use fine water sprays wherever appropriate
Waste management	• Avoid bonfires and burning of waste materials
Demolition	• Ensure effective water suppression is used during demolition operations • Avoid explosive blasting, using appropriate manual or mechanical alternatives • Bag and remove any biological debris or damp down such material before demolition

5.7 Step 4 - Determine Significant Effects

5.7.1 Assuming the relevant mitigation measures outlined in Table 15 are implemented, the residual impact from all dust generating activities is predicted to be **not significant**, in accordance with the IAQM guidance[19].

19 Guidance on the Assessment of Dust from Demolition and Construction V2.2, IAQM, 2024.

6.0 OPERATIONAL PHASE ASSESSMENT

6.1 Introduction

6.1.1 There is the potential for air quality impacts as a result of the operation of the proposed development. These are assessed in the following Sections.

6.2 Potential Development Impacts

1.1.1 The development has the potential to increase concentrations of NO_2, PM_{10} and $PM_{2.5}$ as a result of road traffic exhaust emissions associated with vehicles travelling to and from the site during the operational phase. The proposals have therefore been assessed against the IAQM[20] screening criteria detailed in Section 3.3. Information provided by SCP, the Transport Consultants for the scheme, indicated the development is predicted to generate 123 daily movements. These will be distributed along three different access routes:

- East along White Moss Road;
- North along Rochdale Road; and,
- South along Rochdale Road.

6.2.1 Based on the number of access routes available, the scheme is not predicted to result in an increase of LDV flows of more than 100 AADT on any individual road link. Additionally, the proposals do not include significant highway realignment or the introduction of an off-site junction, and there will not be a requirement for more than 25 HDVs per day. As such, potential air quality impacts associated with the operational phase road vehicle exhaust emissions are predicted to be **not significant**, in accordance with the IAQM guidance[21].

6.3 Potential Future Exposure

6.3.1 The proposed development includes land use sensitive to short and long-term pollutant concentrations. As such, there is the potential for new receptors to be introduced into an

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

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

area of poor air quality. Existing conditions at the site have therefore been considered below.

6.3.2 The site is located adjacent to the GMCA AQMA which has been declared due to exceedences of the annual mean AQO for NO_2. However, there may be locations where elevated concentrations are not experienced within the designation. This can be seen through review of GMCA's 'Greater Manchester LAQM and CAP NO_2 Diffusion Tube Results 2011-2025'[22] which indicates compliance with the relevant AQO at 162 out of 171 monitoring locations within MCC's area of jurisdiction in 2025. Furthermore, as detailed within GMCA's '2025 Air Quality Annual Status Report', annual mean PM_{10} and $PM_{2.5}$ concentrations have not exceeded the AQO or Concentration Target at any monitor within Greater Manchester in the last three years.

6.3.3 Monitoring was undertaken at two locations in the vicinity of the site during recent years. The MA102BNO monitor is considered to be most representative of conditions across the site. Similarly to the western boundary of the development site, the monitor is located at a roadside position on the A664 Rochdale Road, approximately 440m south-west of the site. As shown in Table 10, annual mean concentrations were below the AQO of 40µg/m^3 at this location in recent years, with a concentration of 24.2µg/m^3 recorded in 2025. As such, it is considered that concentrations at the site would be similar to those recorded at MA102BNO. Exceedences of the AQO are therefore considered unlikely at the development location.

6.3.4 As shown in Table 11, predicted background NO_2, PM_{10} and $PM_{2.5}$ concentrations for the grid square containing the site were below the AQOs and Concentration Target during 2026. Based on the predicted background concentrations, exceedences of the relevant criteria are considered unlikely at the development location.

6.3.5 Based on the assessment results, future users are not predicted to be exposed to exceedences of the AQOs and Concentration Target. The site is therefore considered suitable for the proposed end use from an air quality perspective.

22 Greater Manchester LAQM and CAP NO_2 Diffusion Tube Results 2011-2025, GMCA, 2026.

6.4 Interim Planning Guidance for $PM_{2.5}$

6.4.1 Interim Planning Guidance[23] on the consideration of the $PM_{2.5}$ targets identified in the Environment Act (2021) in planning decisions has been produced by DEFRA. This requires evidence that the key sources of air pollution within a development have been identified and appropriate action to minimise $PM_{2.5}$ and its precursors as far as is reasonably practicable be provided in support of planning applications. To assist the process, two questions and associated considerations are provided. These are summarised in Table 16, along with the development response.

Table 16 Interim Planning Guidance Questions

Question	Response
How has exposure to $PM_{2.5}$ been considered when selecting the development site? Factors to consider include: • Site proximity to people (particularly large populations and/or vulnerable groups, e.g. schools, hospitals, care homes, areas of deprivation) and the impact of the development on these • Site proximity to pollution sources and the impact of these on users of the development • Exposure and emissions during both construction and in-use	The site is located in a near places of work and residential areas. As such, the scheme is in close proximity to a large population. However, impacts associated with road vehicle exhaust emissions generated by the development are predicted to be **not significant**, as summarised in Section 6.2 The site is adjacent to Rochdale Road and associated vehicle emissions. However, the results of the assessment, as shown in Section 6.3, indicate that predicted $PM_{2.5}$ levels are anticipated to be below the Concentration Target across the development As outlined in Table 15, a number of mitigation measures will be used throughout the construction phase in order to reduce fugitive dust emissions as far as practicable. This will control potential exposure at off-site locations
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? Factors to consider include: • Site layout • The development's design • Technology used in the construction or installed for use in the development • Construction and future use of the development	In order to reduce emissions of $PM_{2.5}$ with associated impacts at nearby receptors and on site, the following measures have been included within the scheme: • Provision of secure cycle storage spaces to encourage the use of sustainable transport modes • Provision of Electric vehicle (EV) charging to encourage the use of zero emission vehicles • The site is located close to existing public transport links. Existing bus stops are located on White Moss Road and Rochdale Road within 50m of the site boundary, further encouraging the use of sustainable transport modes Further to the above, in order to reduce emissions during the construction phase, a number of mitigation

23 https://uk-air.defra.gov.uk/pm25targets/planning.

Question	Response
	measures will be used to minimise dust generation from associated activities. These are outlined in Table 15

6.4.2 Based on the responses provided in Table 16 and the assessment results, as outlined in Sections 5.0 and 6.0, it is considered that the development has identified key sources of air pollution and taken appropriate action to minimise emissions of $PM_{2.5}$.

7.0 MITIGATION

7.1.1 A number of mitigation measures have been included within the development to encourage the use of sustainable transport modes, manage vehicle flow and reduce pollution around the site. These are in accordance with MCC's 'Air Quality and Planning Technical Guidance'[24], which is based upon the Good Practice Design Principles outlined in the IAQM document 'Land-Use Planning & Development Control: Planning for Air Quality'[25]. Table 17 describes the good practice principles along with how each has been addressed with regards to the proposals.

Table 17 Overall Road Vehicle Exhaust Emissions Impact Significance

Phase	Principle	Action
Design Phase	New developments should not contravene the Council's AQAP[26], or render any of the measures unworkable	It is confirmed that the proposals will not contravene MCC's AQAP, or render any of the measures unworkable
	Wherever possible, new developments should not create a new "street canyon", or a building configuration that inhibits effective pollution dispersion	The development will not create a new street canyon or a building configuration that inhibits effective dispersion
	Delivering sustainable development should be the key theme of any application	The proposals have been designed to encourage sustainable behaviours, such as active and public transport due to its proximity to public transport and amenities. There is also provision of 46 secure and covered cycle storage spaces
Operational Phase	The provision of at least 1 EV "rapid charge" point per 10 residential dwellings and/ or 1,000m^2 of commercial floor space. Where on-site parking is provided for residential dwellings, EV charging points for each parking space should be made	EV charging points can be included within the development

24 Air Quality & Planning Technical Guidance, MCC, 2022.

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

26 Greater Manchester AQAP 2016-2021, GMCA, 2016.

Phase	Principle	Action
	Where development generates significant additional traffic, provision of a detailed Travel Plan (with provision to measure its implementation and effect) which sets out measures to encourage sustainable means of transport (public, cycling and walking) via subsidised or free-ticketing, improved links to bus stops, improved infrastructure and layouts to improve accessibility and safety	A Travel Plan can be secured via condition, if required by MCC
	All gas-fired boilers to meet a minimum standard of <40mgNO_x/kWh	It is anticipated that the heating and hot water provision for the dwellings would be provided by Air Source Heat Pumps or an alternative all-electric system. Any boilers to be included in the development will be provisioned in accordance with the relevant requirements. This can be secured via condition, if required by MCC

7.1.2 It is considered the above methods would further reduce potential impacts associated with the scheme. Specific mitigation suited to the proposals may be stipulated as a planning condition if deemed necessary by the LA.

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8.0 CONCLUSION

8.1.1 Energy Counsel was commissioned by Chapter WBL Ltd. to undertake an Air Quality Assessment in support of a residential development at White Moss Road, Blackley.

8.1.2 The development has the potential to cause air quality impacts at sensitive locations during the construction and operational phases, as well as exposure of future residents to any existing air quality issues at the site. As such, an Air Quality Assessment was undertaken in order to determine baseline conditions and consider potential effects as a result of the proposals.

8.1.3 During the construction phase of the development there is the potential for air quality impacts from fugitive dust emissions from the site. These were assessed in accordance with the IAQM methodology[27]. Site-specific dust control measures were subsequently determined based on the identified risk ratings. Subject to implementation, residual air quality impacts from dust generated by demolition, earthworks, construction and trackout activities are predicted to be **not significant**.

8.1.4 Potential impacts during the operational phase of the proposed development may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the site. These were assessed against the screening criteria provided within the IAQM guidance[28]. Due to the low number of vehicle trips generated by the proposals, road traffic exhaust impacts were predicted to be **not significant**.

8.1.5 The potential for exposure of future residents to elevated pollution levels was assessed based on AQMA designations, local monitoring results and background concentrations. The assessment indicated that concentrations of NO_2, PM_{10} and $PM_{2.5}$ are likely to be below the relevant AQOs and Concentration Target across the site. As such, the development is considered suitable for the proposed use from an air quality perspective.

8.1.6 A number of mitigation measures were identified in line with the requirements of the MCC's 'Air Quality and Planning Technical Guidance[24] in order to reduce vehicle exhaust emissions associated with the proposals. It is considered these are appropriate for a

27 Guidance on the Assessment of Dust from Demolition and Construction V2.2, IAQM, 2024.

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

development of this scale and nature and will further control impacts during the operational phase.

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

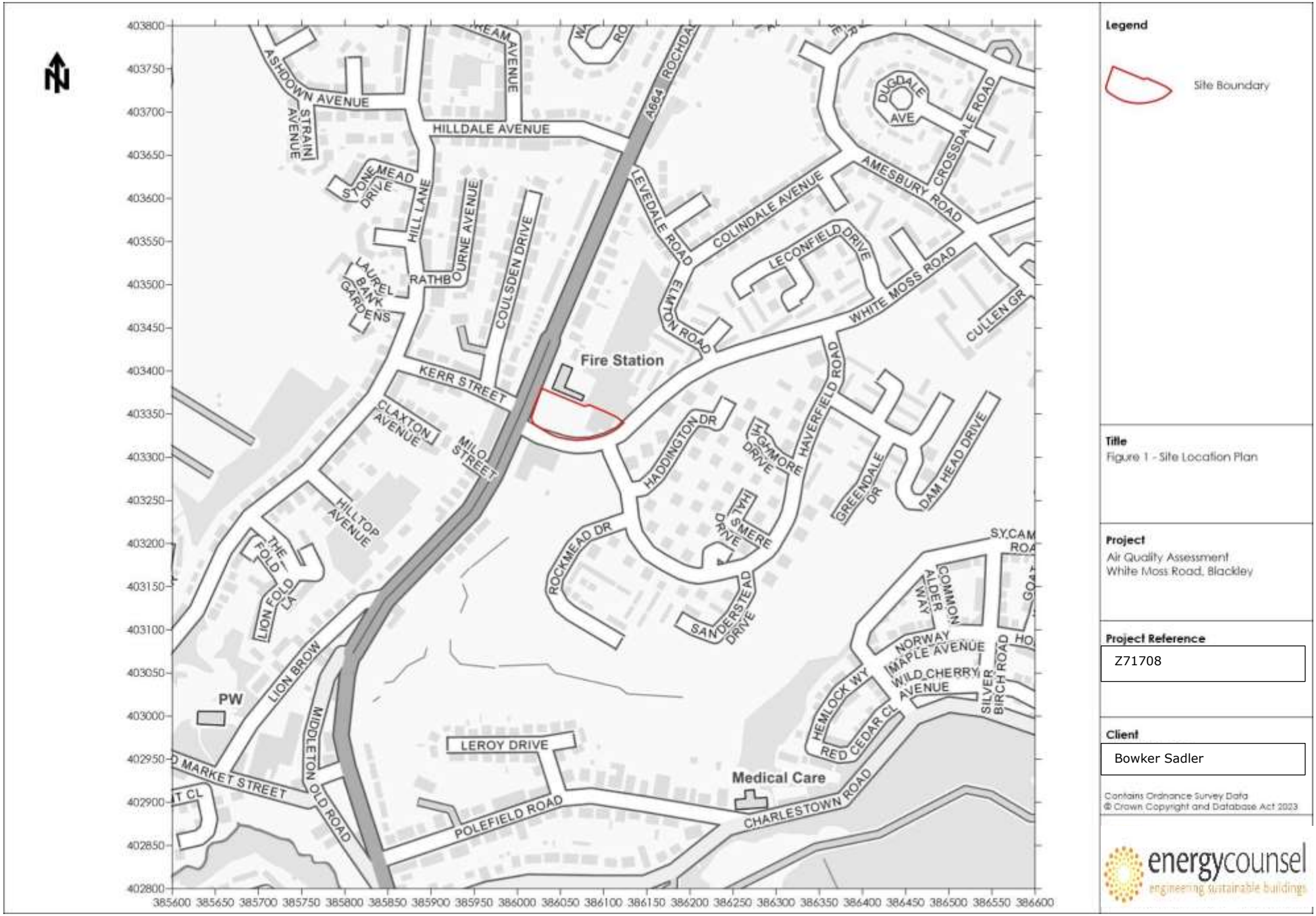
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9.0 ABBREVIATIONS

AADT	Annual Average Daily Traffic
AQLV	Air Quality Limit Value
AQMA	Air Quality Management Area
AQO	Air Quality Objective
AQS	Air Quality Strategy
ASR	Annual Status Report
CAP	Clean Air Plan
DEFRA	Department for Environment, Food and Rural Affairs
DPD	Development Plan Document
GMCA	Greater Manchester Combined Authority
EV	Electric Vehicle
HDV	Heavy Duty Vehicle
IAQM	Institute of Air Quality Management
LA	Local Authority
LAQM	Local Air Quality Management
LDV	Light Duty Vehicle
MCC	Manchester City Council
NGR	National Grid Reference
NO_2	Nitrogen dioxide
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
PfEP	Places for Everyone Plan
PM_{10}	Particulate matter with an aerodynamic diameter of less than 10µm
$PM_{2.5}$	Particulate matter with an aerodynamic diameter of less than 2.5µm
TfGM	Transport for Greater Manchester

Figures

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Legend

Site Boundary

Title

Figure 1 - Site Location Plan

Project

Air Quality Assessment
White Moss Road, Blackley

Project Reference

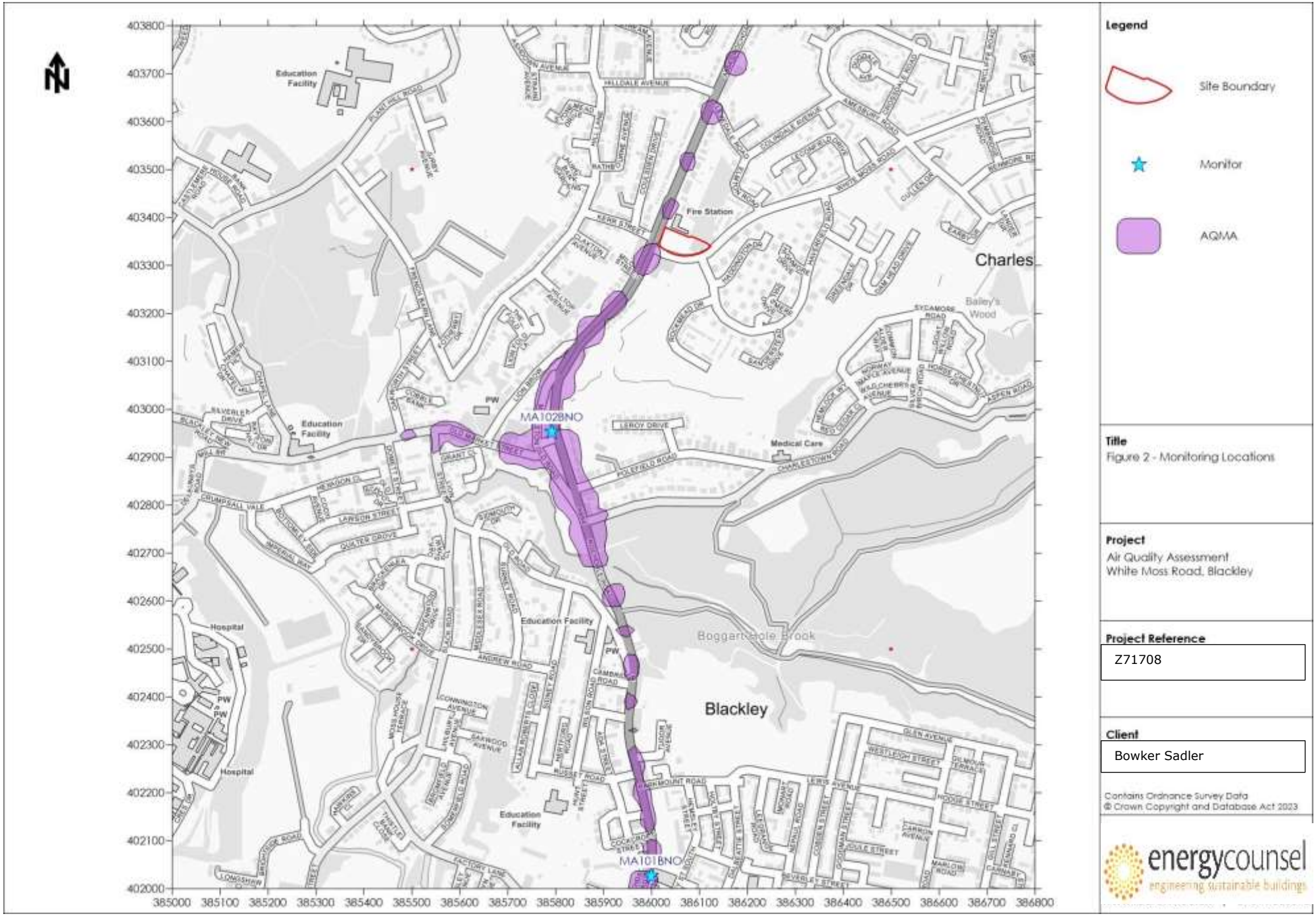
Z71708

Client

Bowker Sadler

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Legend
Site Boundary
Monitor
AQMA
Title
Figure 2 - Monitoring Locations
Project
Air Quality Assessment
White Moss Road, Blackley
Project Reference
Z71708
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