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AIR QUALITY ASSESSMENT

FORMER DUCIE ARMS, 424 STOCKPORT ROAD, MANCHESTER, M12 4EX

Client: Shellco 148 Ltd

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1 INTRODUCTION

1.1 Introduction to Report

1.1.1 NoiseAir Limited was commissioned to undertake an updated Air Quality Assessment (AQA) to support the discharge of Condition 11 attached to Planning Approval reference 142669/FO/2025 for the development at the Former Ducie Arms, 424 Stockport Road, Manchester, M12 4EX, herein referred to as 'the Site'.

1.1.2 It is understood that the approved development comprises the construction of a new purpose-built private medical centre and 9 residential apartments, with associated on-site parking (14 spaces), and amenity space.

1.1.3 Manchester City Council (MCC), as the Local Planning Authority, granted planning approval subject to Condition 11, which states:

> *"11) Within 1 months of the date of this decision, an updated Air Quality Assessment shall be submitted to and agreed in writing by the City Council as Local Planning Authority. The development shall only be implemented in accordance with any agreed mitigation."*

1.1.4 This updated AQA considers air quality conditions at the Site and identifies any mitigation measures required to address potential exposure of future occupiers.

1.1.5 Limitations of this report are outlined in **Appendix A**.

1.2 Site Location and Context

1.2.1 The Site is located at 424 Stockport Road, at approximate National Grid Reference (NGR): 386477, 395934.

1.2.2 **Figure 1** details the location of the Site.

1.2.3 The Site is located within an Air Quality Management Area (AQMA), an area where air quality is mainly influenced by road traffic emissions along the local road network. As such, elevated pollutant concentrations may be experienced at and around this location. Subsequently, the Proposed Development may lead to adverse impacts at nearby sensitive receptors, during construction and operation. As such, an AQA has been carried out to determine potential impacts associated with the proposed development in accordance with the requirements of The National Planning Policy Framework (NPPF). The AQA has

considered ambient pollutant concentrations, namely nitrogen dioxide (NO_2) and particulate matter (PM_{10} and $PM_{2.5}$) around the Site.

1.2.4 The main potential sources of air pollution have been identified as emissions from road transport using the local road network. There are no significant combustion sources identified within the immediate vicinity of the Site that will influence the local air quality.

1.2.5 The Site is currently unoccupied, as the former Ducie Arms public house has been demolished. It is located to the southwest side of Stockport Road (A6), at the junction with Plymouth Grove (A5184). It is bounded by Stockport Road to the northeast, Plymouth Grove to the south and Hayley Street to the west, with a community hub immediately to the northwest. The surrounding area comprises a mix of residential properties, commercial premises and community facilities.

1.2.6 The report presents the findings of an assessment of the potential air quality impacts of the Proposed Development during the construction and operational phases. For both phases, the significance of potential impacts are identified, and measures that should be employed to minimise these are described.

2 LEGISLATION AND POLICY

2.1 Air Quality Legislation and Policy

2.1.1 A summary of the relevant air quality legislation and policy is provided below.

Air Quality Strategy

2.1.2 The government's policy on air quality within England is set out in the Air Quality Strategy for England (AQS), with the latest framework for local authority delivery within England published in 2023[1].

2.1.3 The AQS for England provides a framework for local authority action to improve air quality and supports the delivery of the Local Air Quality Management regime established under Part IV of the Environment Act 1995, as amended by the Environment Act 2021. The applicable air quality objectives are prescribed through the Air Quality (England) Regulations 2000, as amended.

2.1.4 The AQOs applicable under the LAQM framework cover seven key pollutants to protect human health. These are benzene (C_6H_6), 1,3 butadiene (C_4H_6), carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), particulate matter (PM_{10}) and sulphur dioxide (SO_2).

2.1.5 AQOs have been established to protect human health and are policy targets that specify a pollutant concentration, averaging period and, where applicable, a permitted number of exceedances.

2.1.6 $PM_{2.5}$ is not currently part of the Local Air Quality Management framework and therefore does not have any associated AQOs. However, the Air Quality Standards Regulations 2010 establish an annual mean limit value of 20 µg/m³ for $PM_{2.5}$. In addition, the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 establish two legally binding targets for England to be achieved by 31 December 2040:

- a maximum annual mean $PM_{2.5}$ concentration of 10 µg/m³; and
- a reduction in average population exposure to $PM_{2.5}$ of at least 35% relative to a 2018 baseline.

[1] Department for Environment, Food and Rural Affairs (Defra, 2023). Policy paper Air quality strategy: framework for local authority delivery.

2.1.7 The Environmental Improvement Plan 2025[2] establishes updated interim targets to be achieved by December 2030, comprising:

- a maximum annual mean PM2.5 concentration of 10 µg/m³; and
- a 30% reduction in average population exposure relative to a 2018 baseline.

2.1.8 The population exposure targets apply at the national level and are not directly applicable as site-specific assessment criteria.

2.1.9 **Table 1** presents the AQOs, limit value and interim target for pollutants considered within this assessment.

Table 1: Air Quality Objectives, Limit Value and Targets Relevant to the Assessment

Pollutant	Applies to	Air Quality Objective/Interim Target	Measured As
NO_2	England	40 µg/m^3	Annual mean
	England	200 µg/m^3 not to be exceeded more than 18 times a year	1-hour mean
PM_{10}	England	40 µg/m^3	Annual mean
	England	50 µg/m^3 not to be exceeded more than 35 times a year	24-hour mean
$PM_{2.5}$	England	20 µg/m³ current limit value	Annual mean
	England	EIP 2025 interim target of 10 µg/m^3, to be achieved by 2030	Annual mean
	England	Legally binding concentration target of 10 µg/m^3, to be achieved by 2040	Annual mean

2.1.10 For the pollutants considered in this assessment, there are both long-term (annual mean) and short-term standards. In the case of NO_2, the short-term standard is for a 1-hour averaging period, whereas for PM_{10} it is a 24-hour averaging period. These periods reflect the varying impacts on health of differing exposures to pollutants, for example temporary exposure on the pavement adjacent to a busy road compared with the exposure of residential properties adjacent to a road.

Air Quality Regulations

2.1.11 Many of the objectives within the Air Quality Strategy (AQS) have been made statutory in England through the Air Quality (England) Regulations 2000 and the Air Quality (England)

[2] Department for Environment, Food and Rural Affairs (Defra), 2025. Environmental Improvement Plan 2025.

(Amendment) Regulations 2002, supporting the framework for Local Air Quality Management (LAQM).

2.1.12 These Regulations require that potential exceedances of the AQS objectives be assessed at locations situated outside buildings or other natural or man-made structures, whether above or below ground, where members of the public are regularly present.

2.1.13 The Air Quality Standards (Amendment) Regulations 2016 amended the Air Quality Standards Regulations 2010, transposing the European Union Ambient Air Quality Directive (2008/50/EC) into English law. This Directive establishes legally binding limit values for concentrations of major air pollutants impacting public health, including NO_2, PM_{10} and $PM_{2.5}$. The limit values for NO_2 and PM_{10} remain consistent with the relevant AQOs, while the limit value for $PM_{2.5}$ is set as an annual mean concentration of 20 µg/m³.

Environmental Protection Act 1990 – Control of Dust and Particles Associated with Construction

2.1.14 Section 79 of the Environmental Protection Act 1990[3] gives the following definitions of statutory nuisance relevant to dust and particles:

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

2.1.15 Following this, Section 80 says that where a statutory nuisance is shown to exist, the local authority must serve an abatement notice. Failure to comply with an abatement notice is an offence and if necessary, the local authority may abate the nuisance and recover expenses.

2.1.16 There are no statutory limit values for dust deposition above which 'nuisance' is deemed to exist. Nuisance is a subjective concept, and its perception is highly dependent upon the existing conditions and the change which has occurred.

Environment Act

2.1.17 Under Part IV of the Environment Act 1995[4], local authorities must review and document local air quality within their area by way of staged appraisals and respond accordingly, with

[3] Environmental Protection Act. London 1990. HMSO.
[4] Environment Act 1995. HMSO.

the aim of meeting the air quality objectives defined in the Regulations. Where the objectives are not likely to be achieved, an authority is required to designate an Air Quality Management Area (AQMA). For each AQMA the local authority is required to draw up an Air Quality Action Plan (AQAP) to secure improvements in air quality and show how it intends to work towards achieving air quality standards in the future.

2.1.18 The Environment Act 2021[5] further strengthens the framework for air quality management in England by introducing legally binding targets for fine particulate matter ($PM_{2.5}$) concentrations and establishing new mechanisms for monitoring and enforcement. The Act requires the Secretary of State to set ambitious, health-based $PM_{2.5}$ targets and mandates regular reporting on progress.

Clean Air Strategy (2019)

2.1.19 In 2019, the UK government released its Clean Air Strategy 2019[6], part of its 25 Year Environment Plan[7]. The Strategy sets out the comprehensive action that is considered to be required from across all parts of government and society.

2.1.20 The primary focus of air quality management has primarily related to NO_2, and its principal source in the UK, road traffic. The 2019 Strategy aims to broaden the focus to other areas, including actions on clean growth, and emissions from domestic wood burning stoves, industry and agriculture.

2.2 Planning Policy

2.2.1 A summary of the national and local planning policy relevant to the Proposed Development and air quality is provided below.

National Planning Policy Framework (2026)

2.2.2 The Government's overall planning policies for England are described in the National Planning Policy Framework[8]. The core underpinning principle of the Framework is the presumption in favour of sustainable development, defined as:

[5] Environment Act 2021. HMSO.
[6] Department for Environment, Food and Rural Affairs (2019) Clean Air Strategy 2019.
[7] Department for Environment Food and Rural Affairs (Defra) (2018) A Green Future: Our 25 Year Plan to Improve the Environment.
[8] Ministry of Housing, Communities & Local Government (2026). National Planning Policy Framework.

> *"meeting the needs of the present without compromising the ability of future generations to meet their own needs".*

2.2.3 Paragraph 17 identifies three overarching and interdependent objectives for achieving sustainable development. The environmental objective, which is of relevance to air quality, is:

> *"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."*

2.2.4 Chapter 15 of the NPPF relates to promoting sustainable transport. **Policy TR3: Locating development in sustainable locations**, states that development proposals should reflect a number of principles, including that:

> *"The environmental impacts of traffic and transport infrastructure should be identified, assessed and taken into account – including taking opportunities to avoid or mitigate any adverse environmental effects, and to secure net environmental gains such as reductions in air pollution."*

2.2.5 Chapter 17 of the NPPF relates to pollution, public protection and security. **Policy P1: Planning for clean and safe places**, requires development plans to:

> *"support efforts to avoid and mitigate risks from natural and man-made hazards, minimise levels of pollution and create clean, liveable and safe places for people to live, work and visit".*

2.2.6 In particular, development plans should allocate land where, taking account of the potential for mitigation:

> *"occupiers and users will not be put at risk from, or be adversely affected by, unacceptable levels of pollution";* and

> *"development proposals will not cause unacceptable levels of pollution, either alone or in combination with other pollution sources, taking into account communities which may be particularly vulnerable to its effects, such as children and older people, as well as habitats and species which may be vulnerable to pollution".*

2.2.7 Policy P1 also requires development plans to:

> *"Consider any wider opportunities to reduce air, water, soil, noise or other forms of pollution, and contribute to compliance with national and local environmental targets and objectives, through the spatial strategy and policies for specific parts of the plan area (such as by identifying opportunities for strategic nature-based solutions)."*

2.2.8 **Policy P3: Living conditions and pollution**, provides the relevant national decision-making policy for individual development proposals. It states that:

> *"Development proposals should be appropriate for their location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, whether these effects are on or off-site; and whether this is as a result of the development itself or the product of preexisting conditions in its vicinity."*

2.2.9 It further states that development proposals should:

> *"Provide healthy living conditions for occupiers and users in terms of adequate access to light and avoiding exposure to levels of air, noise, artificial light or other sources of pollution which could have an unacceptable adverse effect on health and the quality of life. Where necessary suitable mitigation measures should be incorporated to secure acceptable living conditions;"*
>
> *"Not give rise to, or contribute to, an unacceptable level of access to daylight and sunlight for neighbouring residents and occupiers, or unacceptable levels of air, noise, artificial light, water, soil or other forms of pollution on or beyond the site. Adverse impacts of this nature should be avoided where possible, or else mitigated to an acceptable degree. Where possible, opportunities should be taken to reduce pollution affecting the wider area (such as through traffic and travel management or improved external lighting);"* and
>
> *"Sustain and contribute to compliance with relevant limit values or national objectives and targets for air pollutants including $PM_{2.5}$. Development proposals should take account of Air Quality Management Areas and be consistent with the objectives of relevant Air Quality Action Plans, Clean Air Plans and Local Air Quality Strategies."*

2.2.10 Policy P3 also confirms that:

> *"In applying this policy, it should be assumed, unless there is clear evidence to the contrary, that separate regulatory regimes for the control of pollution will operate effectively, as set out in policy DM7."*

2.2.11 The AQA has been undertaken in accordance with the NPPF.

2.3 Local Planning Policy

Manchester City Council Local Plan

2.3.1 MCC's Core Strategy[9] forms part of the Local Plan and sets out the planning policies used to guide development and determine planning applications within Manchester. The Plan has been reviewed to identify the following policy relevant to this assessment:

> *"**Policy EN16***
>
> ***Air Quality***
>
> *The Council will seek to improve the air quality within Manchester, and particularly within Air Quality Management Areas, located along Manchester's principal traffic routes and at Manchester Airport. Developers will be expected to take measures to minimise and mitigate the local impact of emissions from traffic generated by the development, as well as emissions created by the use of the development itself, including from Combined Heat and Power and biomass plant.*
>
> *When assessing the appropriateness of locations for new development, the Council will consider the impacts on air quality, alongside other plan objectives. This includes cumulative impacts, particularly in Air Quality Management Areas."*

The Places for Everyone Plan

2.3.2 The Places for Everyone Plan[10] was adopted in March 2024. It is the Council's plan for sustainable growth in the nine boroughs, it:

- sets out how they should develop for the years 2022 - 2039;
- provides the strategic framework for local plans;

[9] Manchester City Council (2026). Manchester Core Strategy 2012–2027.
[10] Greater Manchester Combined Authority (2024) Places for Everyone Joint Development Plan 2022 to 2039.

- sets specific requirements to be taken forward in local plans in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused;
- sets out policies to inform the preparation and determination of planning applications;
- identifies the important environmental assets which will be protected and enhanced;
- allocates sites for employment and housing outside of the urban area;
- supports the delivery of key infrastructure, such as transport and utilities;
- defines a new Green Belt boundary for the nine boroughs.

2.3.3 An overview of this document identified the following policies of relevance to air quality and the Proposed Development:

*"**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:

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;*

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."*

Greater Manchester Clean Air Plan

2.3.4 On 23rd January 2025, the government approved the investment-led Greater Manchester Clean Air Plan[11], replacing the previously proposed charging Clean Air Zone. The approved approach does not include charges for driving on local roads.

2.3.5 Greater Manchester remains under government direction to achieve compliance with legal limits for NO_2 on local roads in the shortest possible time and by 2026. The Plan supports this through investment in cleaner buses and taxis, alongside targeted measures to improve traffic flows. Current measures include:

- A **£51.1 million Clean Bus Fund**, supporting 78 zero emission buses and bus depot electrification in Manchester and Bolton;

[11] Transport for Greater Manchester (2026) Greater Manchester Clean Air Plan. Available at: https://cleanairgm.com/clean-air-plan/ [Accessed: 07/10/2026].

- An **£8 million Hackney Support Fund**, helping Greater Manchester's black cab fleet transition to cleaner vehicles; and
- Traffic management measures in Manchester and Salford, including signal timing adjustments, a reduced speed limit on Regent Road and yellow box enforcement on the Regent Road and Quay Street corridors.

2.3.6 The Plan is being implemented, with continued monitoring and reporting to assess its effectiveness in achieving compliance with legal NO_2 limits. Monitoring will continue following compliance to confirm that concentrations remain within these limits.

2.4 Guidance

National Planning Guidance

2.4.1 A summary of the publications referred to in undertaking this assessment is provided below.

Local Air Quality Management Review and Assessment Technical Guidance (2022)

2.4.2 The Department for Environment, Food and Rural Affairs (Defra) has published technical guidance for use by local authorities in their review and assessment work. This guidance, referred to in this document as LAQM.TG22[12], has been used where appropriate in the assessment presented herein.

Land-Use Planning & Development Control: Planning for Air Quality (2017)

2.4.3 Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) have published guidance[13] that offers comprehensive advice on when an air quality assessment may be required; what should be included in an assessment; how to determine the significance of any air quality impacts associated with a development; and, the possible mitigation measures that may be implemented to minimise these impacts.

Guidance on the Assessment of Dust from Demolition and Construction (2024)

2.4.4 This document[14] published by the IAQM was produced to provide guidance to developers, consultants and environmental health officers on how to assess the impacts arising from

[12] Department for Environment, Food and Rural Affairs (Defra) (2022) Part IV The Environment Act 1995 as amended by the Environment Act 2021 Environment (Northern Ireland) Order 2002 Part III, Local Air Quality Management Technical Guidance LAQM.TG22.
[13] Environmental Protection UK and Institute of Air Quality Management (Version 1.2 Updated January 2017) Land Use Planning & Development Control: Planning for Air Quality.
[14] Institute of Air Quality Management (2024) Guidance on the Assessment of Dust from Demolition and Construction Version 2.2 (January 2024).

construction activities. The emphasis of the methodology is on classifying sites according to the risk of impacts (in terms of dust nuisance, PM_{10} impacts on public exposure and impact upon sensitive ecological receptors) and to identify mitigation measures appropriate to the level of risk identified.

National Planning Practice Guidance - Air Quality (2019)

2.4.5 This guidance[15] provides a number of guiding principles on how the planning process can take into account the impact of new development on air quality, it explains how much detail air quality assessments need to include for proposed developments, and how impacts on air quality can be mitigated. It also provides information on how air quality is taken into account by local authorities in both the wider planning context of Local Plans and neighbourhood planning, and in individual cases where air quality is a consideration in a planning decision.

[15] Department of Communities and Local Government (DCLG) (Updated November 2019) National Planning Practice Guidance.

3 SCOPE AND METHODOLOGY

3.1 Scope

3.1.1 The scope of the assessment has been determined in the following way:

- A review of the plans for the Proposed Development and the requirements of Condition 11 attached to Planning Approval reference 142669/FO/2025;
- A desktop review to identify nearby existing receptors sensitive to changes in air quality and proposed receptors representing future occupiers;
- Review of Greater Manchester Combined Authority's (GMCA's) latest available Air Quality Annual Status Report (ASR)[16], the GMCA Clean Air Data Hub[17,] air quality data surrounding the Site including data from Defra[18]; and
- A review of the previous Air Quality Assessment undertaken by EnSafe Consultants in 2021[19], including the reported development-generated traffic flows.

3.1.2 The scope of the assessment includes consideration of the potential impact on local air quality resulting from:

- Dust and particulate matter generated by on-site activities during the construction phase;
- Increases in pollutant concentrations as a result of exhaust emissions arising from construction traffic and plant; and
- Increases in pollutant concentrations as a result of exhaust emissions arising from traffic generated by the Proposed Development once operational.

3.2 Construction Phase Assessment

3.2.1 Dust comprises particles typically in the size range of 1-75 micrometres (μm) in aerodynamic diameter and is created through the action of crushing and abrasive forces on materials. The larger dust particles fall out of the atmosphere quickly after initial release and therefore tend to be deposited in close proximity to the source of emission. Dust therefore is unlikely to cause long term or wide-spread changes to air quality; however, its deposition on

[16] Greater Manchester Combined Authority (2026) 2025 Air Quality Annual Status Report (ASR).
[17] Greater Manchester Combined Authority (2026) Clean Air Greater Manchester Data Hub [Online] Available at https://cleanairgm.com/data-hub/diffusion-tubes#map [Accessed 05/10/2026].
[18] Department for Environment, Food and Rural Affairs (Defra) Local Air Quality Management (LAQM) Support Pages.
[19] EnSafe Consultants (2021). Air Quality Assessment for Shellco 148 Limited at Ducie Arms, 424 Stockport Road, Longsight, Manchester, M12 4EX (AQ109852)

property and cars can cause 'soiling' and discolouration. This may result in complaints of nuisance through amenity loss or perceived damage caused, which is usually temporary.

3.2.2 The smaller particles of dust are known as particulate matter, with less than 10µm in aerodynamic diameter (PM_{10}) representing only a small proportion of total dust released; this includes a finer fraction, known as $PM_{2.5}$ (with an aerodynamic diameter less than 2.5µm). As these particles are at the smaller end of the size range of dust particles, they remain suspended in the atmosphere for a longer period of time than the larger dust particles, they can therefore be transported by wind over a wider area. PM_{10} and $PM_{2.5}$ are small enough to be drawn into the lungs during breathing, which in sensitive members of the public could have a potential impact on health. However, it is worth noting that, according to the IAQM guidance, the majority of fugitive particulate emissions arising from construction sites are expected to relate to the coarser fractions (i.e. $PM_{2.5-10}$) with just 10-15% expected to comprise $PM_{2.5}$. The IAQM guidance therefore focusses on PM_{10} for the purposes of assessment.

3.2.3 An assessment of the likely significant impacts on local air quality due to the generation and dispersion of dust and PM_{10} during the construction phase has been undertaken using: the relevant assessment methodology published by the IAQM; the available information for this phase of the Proposed Development provided by the Client and Project Team; and the professional judgement of the NoiseAir team.

3.2.4 The IAQM methodology assesses the risk of potential dust and PM_{10} impacts from the following four sources: demolition, earthworks, construction and trackout. It takes into account the nature and scale of the activities undertaken for each source and the sensitivity of the area to an increase in PM_{10} levels to assign a level of risk. Risks are described in terms of there being a low, medium or high risk of dust impacts. Once the level of risk has been identified, the significance of residual effects can be determined. A summary of the IAQM assessment methodology is provided in **Appendix C**.

3.2.5 In addition to the impacts on local air quality due to on-site construction activities, exhaust emissions from construction vehicles and plant may have an impact on local air quality adjacent to the routes used by these vehicles to access the application Site and in the vicinity of the application Site itself. As information on the number of vehicles and plant associated with the construction phase was not available at the time of writing, a qualitative assessment of their impact on local air quality has been undertaken using professional judgement and considering the following:

- The number and type of construction traffic and plant likely to be generated by this phase of the development;
- The number and proximity of sensitive receptors to the application Site and along the likely routes to be used by construction vehicles; and
- The likely duration of the construction phase and the nature of the construction activities undertaken.

3.3 Operational Phase Assessment

Impacts of the Local Area on the Development

3.3.1 The Proposed Development has the potential to expose future users to existing air quality issues. In accordance with the EPUK and IAQM guidance, there may be a requirement to carry out an air quality assessment for the impacts of the local area's emissions on the Proposed Development itself. The Proposed Development is located within an AQMA and is situated along Stockport Road, which is a major thoroughfare with heavy traffic; therefore, it falls within the scope for an exposure assessment to be undertaken in accordance with the EPUK and IAQM guidance.

3.3.2 Of the pollutants included in the AQS, concentrations of NO_2, PM_{10} and $PM_{2.5}$ have been considered in this assessment as road traffic is a major source of these pollutants, and their concentrations often approach or exceed the relevant objectives, especially in urban areas.

3.3.3 To predict pollutant concentrations across the Site, the atmospheric dispersion model ADMS-Roads has been used. This model uses detailed information regarding traffic flows on the local road network, surface roughness and local meteorological conditions to predict pollutant concentrations. Details of the model input parameters are presented in **Appendix D**.

Assessment Scenario

3.3.4 Dispersion modelling was undertaken for a single scenario representing the 2025 Base/Verification Year. This scenario was used both to verify the model against local monitoring data and to assess existing pollutant concentrations at the proposed on-site receptors.

3.3.5 Opening year traffic forecasts were not available for this AQA. Given that development-generated traffic falls below the relevant screening criteria, the assessment focuses on on-site exposure using the verified 2025 scenario. This approach does not rely on anticipated

improvements in vehicle emissions or background air quality to demonstrate compliance with the relevant AQOs.

Meteorological Data

3.3.6 Meteorological data, such as wind speed and direction are used by the model to determine pollutant transportation and levels of dilution by the wind. Global Forecast System (GFS) meteorological data was provided by AS Modelling Ltd, for the period 1st January 2025 to 31st December 2025, at NGR: 386477, 395934. The wind rose generated from the meteorological data used for the dispersion modelling of operational phase impacts is provided in **Appendix E**.

Traffic Data

Traffic Flows

3.3.7 The traffic data used in the assessment, comprising 24-hour AADT flows and fleet composition for the local road network for the 2025 Base/Verification Year comprises Department for Transport (DfT) traffic count data[20]. Traffic speeds were reduced at traffic lights and junctions in line with guidance provided in LAQM.TG22 and using professional judgement.

3.3.8 Reference should be made to **Figure 2** for a graphical representation of the modelled road links.

3.3.9 A summary of the traffic data used in the assessment can be found in **Appendix D**.

Street Canyon Effects

3.3.10 A street canyon was included along Stockport Road to account for the influence of buildings adjoining the road on pollutant dispersion. The canyon parameters were selected to represent the surrounding building heights and street geometry, using professional judgement.

[20] Department for Transport (DFT) (2026) Road traffic statistics [Online]. Available https://roadtraffic.dft.gov.uk/#6/55.254/-6.053/basemap-regions-countpoints [Accessed 05/10/2026].

Vehicle Emission Factors

3.3.11 Emission factors for each link were calculated using the relevant traffic flows and the Emission Factor Toolkit[21] (EFT, Version 13.1). This has been produced by Defra and incorporates COPERT 5.8 vehicle emission factors and fleet information.

Selection of Receptor Locations

3.3.12 Four receptor locations were included at the Proposed Development façades. Receptors PR1a and PR2a were modelled at a height of 1.5 m, representing ground floor exposure, and PR1b and PR2b at a height of 4.5 m, representing first floor exposure. The ground floor medical centre and residential dwellings have both been treated as highly sensitive receptors.

3.3.13 Modelling was limited to ground and first floor receptors, where exposure to road traffic emissions is expected to be greatest. Roadside pollutant concentrations are generally expected to decrease with height as emissions disperse. The results at these lower levels therefore provide a conservative basis for considering exposure at the upper floors.

3.3.14 Details of the proposed sensitive receptors modelled in the assessment are included in **Table 2**, below and shown on **Figure 3**.

Table 2: Modelled Receptor Locations

Receptor ID	Location		
	X (m)	Y (m)	Z (m)
PR1a	386473	395951	1.5
PR1b	386473	395951	4.5
PR2a	386497	395929	1.5
PR2b	386497	395929	4.5

Selection of Background Concentrations

3.3.15 Background pollutant data for the operational phase assessment have been taken from the national maps provided on the Defra[22] website, where background concentrations of those pollutants included within the AQS have been mapped at a grid resolution of 1x1 km for the whole of the UK. Estimated background concentrations are available for all years between

[21] Department for Environment, Food and Rural Affairs (Defra) Emissions Factor Toolkit [Online] Available at https://laqm.defra.gov.uk/air-quality/air-quality-assessment/emissions-factors-toolkit/ [Accessed on 05/10/2026].
[22] Department for Environment, Food and Rural Affairs (Defra) Background Concentrations 2021 [Online] Available at https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2021 [Accessed on 05/10/2026].

2021 and 2040. The maps assume that background concentrations will improve (i.e., reduce) over time, in line with the predicted reduction in vehicle emissions, and emissions from other sources.

Model Verification and Result Processing

3.3.16 The ADMS-Roads dispersion model, widely utilised for this type of assessment, is considered to be fit for purpose. Nonetheless, model validation undertaken by the software developer will not have included validation in the vicinity of the Proposed Development.

3.3.17 To determine the performance of the model at a local level, a comparison of modelled results and monitoring results carried out within the study area was undertaken. This verification process aims to minimise modelling uncertainty and systematic error by applying adjustment factors to the model's results to increase confidence in the final results.

3.3.18 Two air quality monitoring locations were identified as suitable for use in the model verification process:

- CAP_MANC_124; and
- MA88ANO.

3.3.19 Model verification was undertaken following the methodology set out in Chapter 7, Section 4 of LAQM.TG22.

3.3.20 In the absence of suitable local particulate matter monitoring for independent verification, the road-NO_x adjustment factor has also been applied to modelled road-related PM_{10} and $PM_{2.5}$ concentrations. Background concentrations have then been added to derive total concentrations. This introduces uncertainty because the adjustment factor has not been independently verified for particulate matter.

3.3.21 Further details of the verification process and the verification factor calculations are presented in **Appendix D**.

3.3.22 The road-NO_X output was converted to annual mean NO_2 concentrations utilising Defra's NO_X to NO_2 calculator (version 9.1)[23]. The predicted concentrations were compared against the relevant AQS objective levels for each pollutant set out in **Table 1**.

[23] Department for Environment, Food and Rural Affairs (Defra) NO_x to NO_2 Calculator [Online] Available at https://laqm.defra.gov.uk/air-quality/air-quality-assessment/nox-to-no2-calculator/ [Accessed on 06/10/2026].

3.3.23 The air quality modelling generates pollutant estimates of road source contributed NO_X, PM_{10} and $PM_{2.5}$ at specified receptors. To permit comparison with the relevant air quality objectives for NO_2, PM_{10} and $PM_{2.5}$ it has been necessary to combine the model output data with the background concentrations.

3.3.24 To consider compliance with the 1-hour mean air quality objective for NO_2, Defra's guidance suggests that in locations where the annual mean NO_2 concentration exceeds 60 µg/m^3, then the 1-hour mean objective may be exceeded. Where annual mean concentrations are less than 60 µg/m^3, then exceedance of the 1-hour mean objective is considered unlikely. The risk of non-compliance with the 1-hour mean objective, where up to 18 exceedances of a 1-hour mean concentration of 200 µg/m^3 are allowed in a calendar year, is therefore considered likely when the annual mean concentration is greater than 60µg/m^3 but unlikely when it is not. This approach has been adopted in this assessment.

3.3.25 To consider compliance with the 24-hour mean air quality objective for PM_{10}, Defra's guidance gives the following equation that relates the annual mean concentration to the number of exceedances of the 24-hour mean concentration of 50 µg/m^3, where up to 35 exceedances are allowed:

- No.24-hour mean exceedances = -18.5 + 0.00145 x annual mean^3 + (206/annual mean).

3.3.26 This approach has been adopted for 24-hour mean PM_{10} concentrations for this assessment.

Impacts of the Development on the Local Area

3.3.27 The operational phase of the Proposed Development has the potential to impact air quality at existing sensitive receptors.

3.3.28 The EPUK and IAQM guidance sets out two stages for determining when an assessment of potential impacts on the local area is likely to be necessary. The Stage 1 criteria for an air quality assessment is presented below:

A. If any of the following apply:

- 10 or more residential units or a site area of more than 0.5ha; or
- More than 1,000 m^2 of floor space for all other uses or a site area greater than 1ha.

B. Coupled with any of the following:

- The development has more than 10 parking spaces; or,

- The development will have a centralised energy facility or other centralised combustion process.

3.3.29 Should these criteria not be met, then the EPUK and IAQM guidance considers air quality impacts associated with a scheme to be negligible and no further assessment is required. Should the criteria be met or exceeded, proceed to Stage 2. Stage 2 of the EPUK & IAQM guidance document states the following criteria to help establish when an air quality assessment is likely to be considered necessary:

- Proposals that will cause a change in Light Duty Vehicle (LDV) flows of more than 100 AADT within or adjacent to an AQMA or more than 500 elsewhere.
- Proposals that will cause a change in HDV flows of more than 25 AADT within or adjacent to an AQMA or more than 100 elsewhere.
- Proposals that would realign roads within an AQMA by more than 5m.
- Proposals that will introduce new junctions or remove existing junctions near relevant receptors.
- Proposals that will introduce or change a bus station or change flows of buses by more than 25 AADT within an AQMA or more than 100 AADT elsewhere.
- Proposals which will include an underground car park with extraction system which will be within 20m of a relevant receptor and have more than 100 movements per day.
- Proposals with one or more substantial combustion processes, where there is a risk of impacts at relevant receptors. Typically, any combustion plant where the single or combined NO_x emission rate is less than 5 mg/sec is unlikely to give rise to impacts, provided that the emissions are released from a vent or stack in a location and at a height that provides adequate dispersion, however, there are some exceptions. Therefore, specific details must be cross referenced with the IAQM guidance if proposals include one or more substantial combustion processes.

3.3.30 Should these criteria not be met, then the EPUK and IAQM guidance documents consider air quality impacts associated with a scheme to be not significant and no further assessment being required.

3.3.31 Should screening of the traffic data indicate that any of the above criteria are met, then potential impacts at sensitive receptor locations can be assessed by calculating the predicted change in pollutant concentrations as a result of the Proposed Development.

3.3.32 The significance of predicted impacts can then be determined in accordance with the methodology outlined in the EPUK and IAQM guidance.

4 BASELINE

4.1 Introduction

4.1.1 Existing air quality conditions in the vicinity of the Site have been determined 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), GMCA undertake review and assessment of air quality within the 10 Greater Manchester local authorities that form GMCA, including MCC.

4.2.2 GMCA has declared a single AQMA across the district, Greater Manchester AQMA, which was declared in 2016 for exceedances of the NO_2 annual mean. The Site lies entirely within this AQMA.

4.3 Air Quality Monitoring

4.3.1 The 2025 GMCA ASR and GMCA Clean Air Hub have been reviewed. Monitoring of pollutant concentrations is undertaken by GMCA across the 10 Greater Manchester areas, including MCC.

4.3.2 Annual mean NO_2 concentrations recorded at the closest monitoring to the Proposed Development are outlined in **Table 3** and shown on **Figure 2**.

Table 3: MCC (as part of GMCA Monitoring) Annual Mean NO_2 Concentrations within 1 km of the Site

Site ID	Site Type	Distance to Kerb of Nearest Road (m)	Distance to the Site (m)	Monitored NO_2 Concentration (µg/m^3)		
				2023	2024	2025
CAP_MANC_124	Roadside	3.5	80	**40.9**	37.7	34.6
MA88ANO	Roadside	3	774	36.1	31.9	29.4

DT= Diffusion Tube
Rounded to one decimal point
***Bold** indicated exceedance of AQO*

4.3.3 As shown in **Table 3,** concentrations recorded at the closest monitoring locations to the Site were below the NO_2 annual mean AQO of 40 µg/m^3 in both 2024 and 2025, with an exceedance in 2023 at CAP_MANC_124. Generally, NO_2 concentrations have been decreasing year on year.

4.3.4 There are no PM_{10} or $PM_{2.5}$ monitoring locations in the direct vicinity of the Site.

4.4 Background Pollutant Concentrations

4.4.1 Predictions of background pollutant concentrations on a 1 km-by-1 km basis have been produced by Defra for the entire UK to assist local authorities in their review and assessment of air quality. The Site, all proposed receptors and monitoring location CAP_MANC_124 lie within the grid square centred at 386500, 395500. Monitoring location MA88ANO lies within the grid square centred at 386500, 396500.

4.4.2 Data for these locations were downloaded from the Defra website for 2025 (i.e. the Base/Verification Year), which is summarised in **Table 4**.

Table 4: Predicted Background Pollutant Concentrations

OS Grid Reference (X, Y; m)	Predicted Background Pollutant Concentration (µg/m^3)		
	2025 Base/Verification Year		
	NO_2	PM_{10}	$PM_{2.5}$
386500, 395500	15.72	13.32	7.88
386500, 396500	16.74	13.03	7.71

Rounded to two decimal places

4.4.3 As shown in **Table 4**, predicted background NO_2, PM_{10} and $PM_{2.5}$ concentrations are below the relevant AQOs/interim target across the assessment extents for 2025.

5 ASSESSMENT

5.1 Introduction

5.1.1 There is the potential for air quality impacts as a result of the construction and operation of the Proposed Development. These are assessed in the following sections.

5.2 Construction Phase Assessment

5.2.1 Construction activities that have the potential to generate and/or re-suspend dust and PM_{10} sources include:

- Site clearance and preparation including demolition activities;
- Preparation of temporary access/egress to the Site and haulage routes;
- Earthworks;
- Materials handling, storage, stockpiling, spillage and disposal;
- Movement of vehicles and construction traffic within the Site (including excavators and dumper trucks);
- Use of crushing and screening equipment/plant;
- Exhaust emissions from plant, especially when used at the extremes of their capacity and during mechanical breakdown;
- Construction of buildings, roads and areas of hard standing alongside fabrication processes;
- Internal and external finishing and refurbishment;
- Trackout, whereby earth is carried from the Site on vehicle tyres, deposited on roads and may later become suspended in the air as a result of vehicle movements; and
- Site landscaping after completion.

5.2.2 Most of the releases are likely to occur during the 'working week'. However, for some potential release sources (e.g., exposed soil produced from significant earthworks activities) in the absence of dust control mitigation measures, dust generation has the potential to occur 24 hours per day over the period during which such activities are to take place.

Assessment of Potential Dust Emission Magnitude

5.2.3 The IAQM assessment methodology has been used to determine the potential dust emission magnitude for the following four different dust and PM_{10} sources:

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

5.2.4 The findings of the assessment are presented below.

Demolition

5.2.5 No demolition works are planned as part of the proposals. Therefore, consideration of demolition has been **scoped out** of the construction phase assessment.

Earthworks

5.2.6 The total Site is less than 18,000m^2, and it is anticipated that there will be less than 5 heavy earth moving vehicles active at any one time. As such, the potential dust emission magnitude from earthworks activities is considered to be **small**.

Construction

5.2.7 The total building volume to be constructed will be less than 12,000m^3, however, dusty material such as concrete will be used. As such, the potential dust emission magnitude from construction activities is considered to be **medium**.

Trackout

5.2.8 Information on the number of HDVs associated with this phase of the Proposed Development is currently unavailable and professional judgement has been used. Given the size of the development, it is likely that there will be less than 20 HDV outward movements carried out in any one day. As such, the potential dust emission magnitude from trackout activities is considered to be **small**.

5.2.9 **Table 5** provides a summary of the potential dust emission magnitude determined for each construction activity considered.

Table 5: Potential Dust Emission Magnitude	
Activity	**Dust Emission Magnitude**
Demolition	-
Earthworks	Small
Construction Activities	Medium
Trackout	Small

Assessment of Sensitivity of the Study Area

5.2.10 The wind rose indicates that winds occur most frequently from the south, with a secondary peak from the east-northeast. Receptors to the north and west-southwest of the Site may therefore be more frequently downwind of dust and particulate matter emitted and re-suspended during the construction phase. However, receptors in all directions may be affected under different wind conditions.

5.2.11 The closest ecological receptor to the Site is the Highfield Country Park Local Nature Reserve, which is 2.5 km to the southeast. Therefore, there are no ecological receptors within 50m of the development boundary or access route, or within 50m of the Site entrance as identified using Multi Agency Geographic Information for the Countryside (MAGIC) website[24]. Ecological impacts have therefore been **scoped out**, in accordance with IAQM guidance.

5.2.12 Taking the above into account and following the IAQM assessment methodology, the sensitivity of the area to changes in dust and PM_{10} has been derived for each of the construction activities considered. The results are shown in **Table 6**.

Table 6: Sensitivity of the Study Area				
Potential Impact	**Sensitivity of the Surrounding Area**			
	Demolition	**Earthworks**	**Construction**	**Trackout**
Dust Soiling	-	High	High	High
Human Health	-	Low	Low	Low

[24] Department for Environment, Food and Rural Affairs (Defra) (2026) Multi-Agency Geographic Information for the Countryside (MAGIC) [Online] Available at https://magic.defra.gov.uk/ [Accessed on 06/10/2026].

Risk of Impacts

5.2.13 The predicted dust emission magnitude has been combined with the defined sensitivity of the area to determine the risk of impacts during the construction phase, prior to mitigation. **Table 7** below provides a summary of the risk of dust impacts for the Proposed Development. The risk category identified for each construction activity has been used to determine the level of mitigation required.

Table 7: Summary Dust Risk Table Defining Site Specific Mitigation

Potential Impact	Dust Risk to the Surrounding Area			
	Demolition	Earthworks	Construction	Trackout
Dust Soiling	-	Low Risk	Medium Risk	Low Risk
Human Health	-	Negligible Risk	Negligible Risk	Negligible Risk

Construction Vehicles and Plant

5.2.14 The greatest impact on air quality is emissions from vehicles and plant associated with the construction phase, and these impacts will be in the areas immediately adjacent to the Site access road. Construction traffic will access the Site via Stockport Road.

5.2.15 Due to the size of the Proposed Development, it is considered likely that the construction traffic will be low in comparison to the existing traffic flows on these roads.

5.2.16 Final details of the exact equipment likely to be used on-site will be determined by the appointed contractor.

5.2.17 Based on the likely numbers of construction vehicles that will be used, the impacts are considered to be **negligible** in accordance with the assessment significance criteria.

5.3 Operational Phase Assessment

Impacts of the Local Area on the Development

5.3.1 The Proposed Development is located within an AQMA and includes land use sensitive to long term and short-term pollutant concentrations. To assess the Site's suitability for its intended medical and residential use, an assessment was undertaken using dispersion modelling to predict existing pollutant concentrations at the Proposed Development's façade.

5.3.2 Full results of the dispersion modelling are presented in **Appendix F**, with a summary of the 2025 Base/Verification Year provided overleaf. All results have been verified in accordance with the methodology outlined in **Appendix D**.

Nitrogen Dioxide – Annual Mean

5.3.3 Annual mean NO_2 concentrations were predicted to be below the AQO of 40 µg/m^3 at all receptor locations included in the modelled 2025 Base/Verification Year scenario. The highest concentration is predicted at receptor PR2a, with a concentration of 25.87 µg/m^3.

5.3.4 As all modelled NO_2 concentrations are below the AQO, the Site is deemed suitable for medical and residential use, based on the extent of predicted population exposure to annual mean NO_2 concentrations in accordance with the EPUK and IAQM guidance.

Nitrogen Dioxide – 1-hour Mean

5.3.5 The annual mean NO_2 concentrations predicted by the model were all below 60 µg/m^3, and therefore, hourly mean NO_2 concentrations are unlikely to cause a breach of the AQS objective. As such, the Site is deemed suitable for the intended use, based on the extent of predicted population exposure to hourly mean NO_2 concentrations in accordance with the EPUK and IAQM guidance.

Particulate Matter (PM_{10}) – Annual Mean

5.3.6 Annual mean PM_{10} concentrations were predicted to be below the AQO of 40 µg/m^3 at all receptor locations included in the modelled 2025 Base/Verification Year scenario. The highest concentration is predicted at receptor PR2a, with a concentration of 17.24 µg/m^3.

5.3.7 As all modelled PM_{10} concentrations are below the AQO, the Site is deemed suitable for medical and residential use, based on the extent of predicted population exposure to annual mean PM_{10} concentrations in accordance with the EPUK and IAQM guidance.

Particulate Matter (PM_{10}) – 24-hour Mean

5.3.8 The calculation outlined in paragraph 3.3.25 has been carried out for the receptors with the highest predicted annual mean PM_{10} concentration, i.e. PR2a.

5.3.9 The estimated number of exceedances at this location (0.9) is well below the 35-exceedance limit, indicating compliance with the 24-hour PM_{10} objective. Therefore, the 24-hour mean objective is not expected to be breached at any modelled receptor location once the Proposed Development becomes operational. As such, the impacts of the 24-hour mean

PM_{10} on proposed receptor locations are **negligible** and the Site is deemed suitable for medical and residential use, based on the extent of predicted population exposure to 24-hour mean PM_{10} concentrations in accordance with the EPUK and IAQM guidance.

Particulate Matter ($PM_{2.5}$) – Annual Mean

5.3.10 Annual mean $PM_{2.5}$ concentrations were predicted to be below the interim target of 10 µg/m^3 at all receptor locations included in the modelled 2025 Base/Verification Year scenario. The highest concentration is predicted at receptor PR2a, with a concentration of 9.96 µg/m^3.

5.3.11 As all modelled annual mean $PM_{2.5}$ concentrations are below the interim target, the Site is considered suitable for medical and residential use in relation to predicted exposure to annual mean $PM_{2.5}$ concentrations.

Potential Development Impacts

5.3.12 Any vehicle movements associated with the Proposed Development will generate exhaust emissions on the local and regional road networks.

5.3.13 The proposals remain unchanged from those considered in the previous Air Quality Assessment carried out by EnSafe Consultants in 2021.

5.3.14 The previous assessment reported a maximum development-generated AADT flow of 76 vehicles, based on traffic data provided by Mode Transport Planning. It also identified that the development would not generate more than 25 HDV movements per day or significantly affect average speeds on the local road network.

5.3.15 Although an updated trip generation assessment has not been undertaken, the previous traffic estimate has been adopted for the purposes of this assessment, given that the proposals remain unchanged. On this basis, development-generated traffic remains below the relevant EPUK and IAQM screening criteria for a site within an AQMA. Off-site air quality impacts associated with operational road vehicle exhaust emissions are therefore considered to be **negligible**, and no further assessment of these impacts is considered necessary.

6 MITIGATION AND RESIDUAL EFFECTS

6.1 Construction Phase

6.1.1 Based on the construction phase assessment results, mitigation will be required for this phase. As the Site poses a maximum of **medium risk** for dust impacts, the IAQM's highly recommended mitigation measures for a **medium risk** site are presented below.

Communications:

- Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.
- Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager.
- Display the head or regional office contact information.
- Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority. The level of detail will depend on the risk, and should include as a minimum the highly recommended measures in this document. The desirable measures should be included as appropriate for the site. The DMP may include monitoring of dust deposition, dust flux, real-time PM_{10} continuous monitoring and/or visual inspections.

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 local authority when asked.
- 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 local authority when asked.
- Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.
- Agree dust deposition, dust flux, or real-time PM_{10} continuous monitoring locations with the Local Authority. Where possible commence baseline monitoring at least three

months before work commences on site or, if it a large site, before work on a phase commences. Further guidance is provided by IAQM on monitoring during demolition, earthworks and construction.

Preparing and Maintaining the Site

- Plan 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.
- Fully enclose site or specific operations where there is a high potential for dust production and the site is actives for an extensive period
- Avoid site runoff of water or mud.
- Keep site fencing, barriers and scaffolding clean using wet methods.
- Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below.
- Cover, seed or fence stockpiles to prevent wind whipping.

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.

Operations

- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.
- Ensure an adequate water supply on the site for effective dust /particle matter suppression/mitigation, using non-potable water where possible and appropriate.
- Use enclosed chutes and conveyors and covered skips.
- Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.
- Ensure equipment is readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.

Waste Management

- Avoid bonfires or burning of waste materials.

Measures Specific to construction

- 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.

6.1.2 Detailed mitigation measures to control construction traffic should be discussed with the Local Authority to establish the most suitable access and haul routes for the site traffic. The most effective mitigation will be achieved by ensuring that construction traffic does not pass along sensitive roads (i.e., congested roads, residential roads or unsuitable junctions for large vehicles) where possible. Construction vehicles should be kept clean through the use of wheel washers and sheeted when on public highways. Timing of large- scale vehicle movements to avoid peak hours on the local road network would also be of benefit.

Residual Effects

6.1.3 The residual effects of dust and PM_{10} generated by construction activities following the application of the mitigation measures described above and good Site practice are considered to be **not significant**.

6.1.4 The residual effects of emissions to air from construction vehicles and plant on local air quality is considered to be **not significant**.

6.2 Operational Phase

6.2.1 The impact of the operational phase of the Proposed Development has been found to be **not significant**, in accordance with the EPUK and IAQM guidance, therefore, no mitigation measures are proposed.

Residual Effects

6.2.2 The residual effects of the operational phase Proposed Development are **not significant** for NO_2, PM_{10} and $PM_{2.5}$, in accordance with EPUK and IAQM guidance.

7 SUMMARY AND CONCLUSIONS

7.1.1 NoiseAir Limited was commissioned to undertake an AQA in support of a Proposed Development at the Former Ducie Arms, 424 Stockport Road, Manchester, M12 4EX to support the discharge of Condition 11 attached to Planning Approval reference 142669/FO/2025.

7.1.2 A qualitative assessment of the potential impacts on local air quality from construction activities has been carried out for this phase of the Proposed Development using the IAQM methodology. This identified that there is a maximum of **medium risk** of dust soiling impacts and a **negligible risk** of increases in particulate matter concentrations due to unmitigated construction activities for human health. However, through good site practice and the implementation of highly recommended mitigation measures, the effect of dust and particulate matter releases would be significantly reduced. The residual effects of dust and particulate matter generated by construction activities on air quality are therefore considered to be **not significant**.

7.1.3 The Site lies within Greater Manchester AQMA, an area where air quality is mainly influenced by emissions associated with road traffic along the existing road network. Therefore, dispersion modelling was carried out to establish current air quality conditions at the Proposed Development. Pollutants considered in this assessment were NO_2, PM_{10} and $PM_{2.5}$.

7.1.4 The results of the dispersion modelling indicate that pollutant concentrations at all modelled receptors are predicted to be below the relevant AQOs and interim target in the modelled 2025 scenario. The residual effect of air quality on future users of the Proposed Development is therefore judged to be **not significant**, and it is considered that the Site is suitable for medical and residential use.

7.1.5 In accordance with the IAQM and EPUK guidance, the Proposed Development is expected to result in a **negligible** air quality impact at nearby existing receptors. The residual effect of the Proposed Development is considered to be **not significant**.

7.1.6 Subject to implementation of the recommended construction mitigation measures, the Proposed Development is considered to comply with national and local air quality policy. Based on the findings of this updated AQA, it is recommended that Condition 11 be discharged, subject to MCC's agreement.

FIGURES

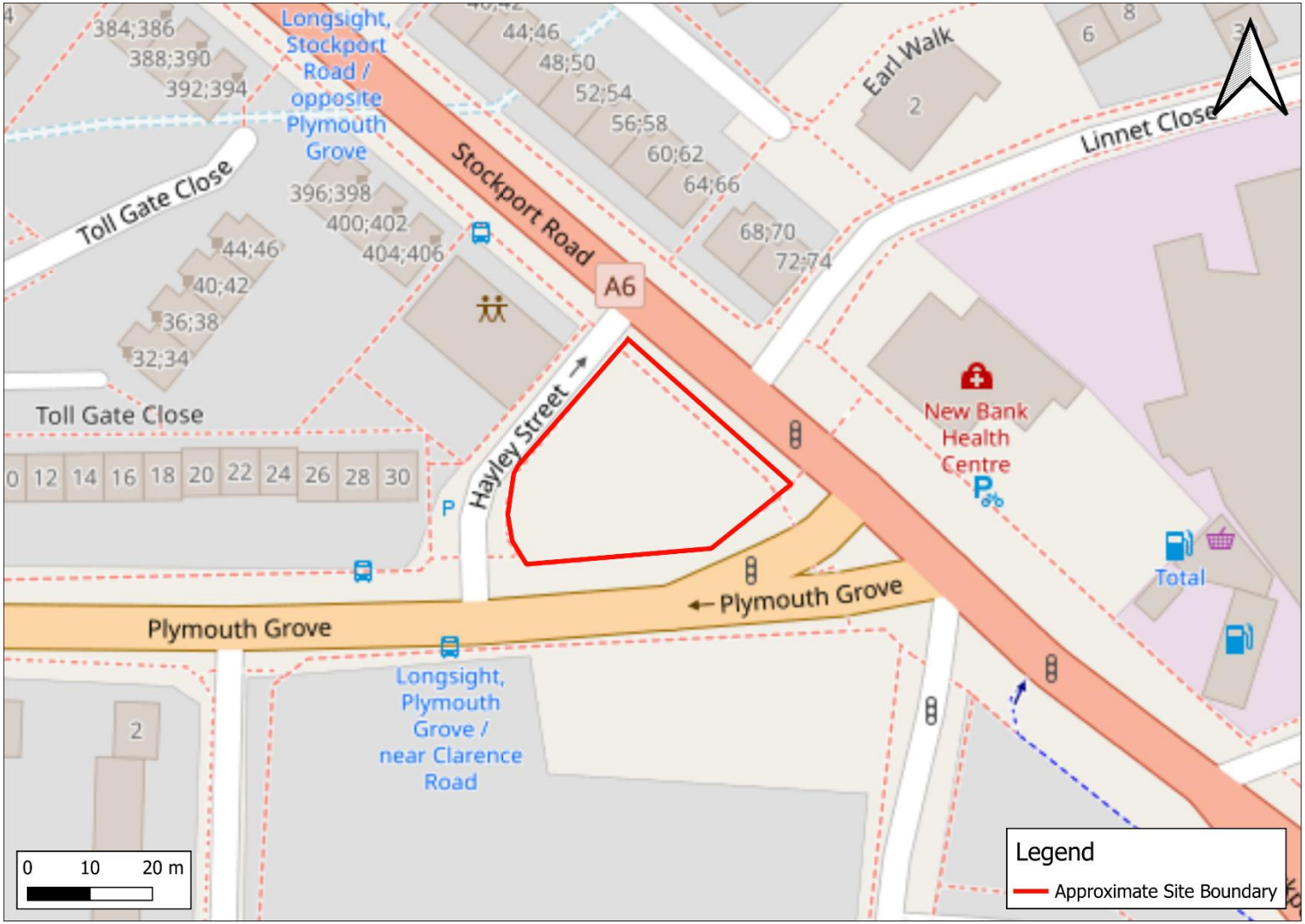


Figure 1: Site Location

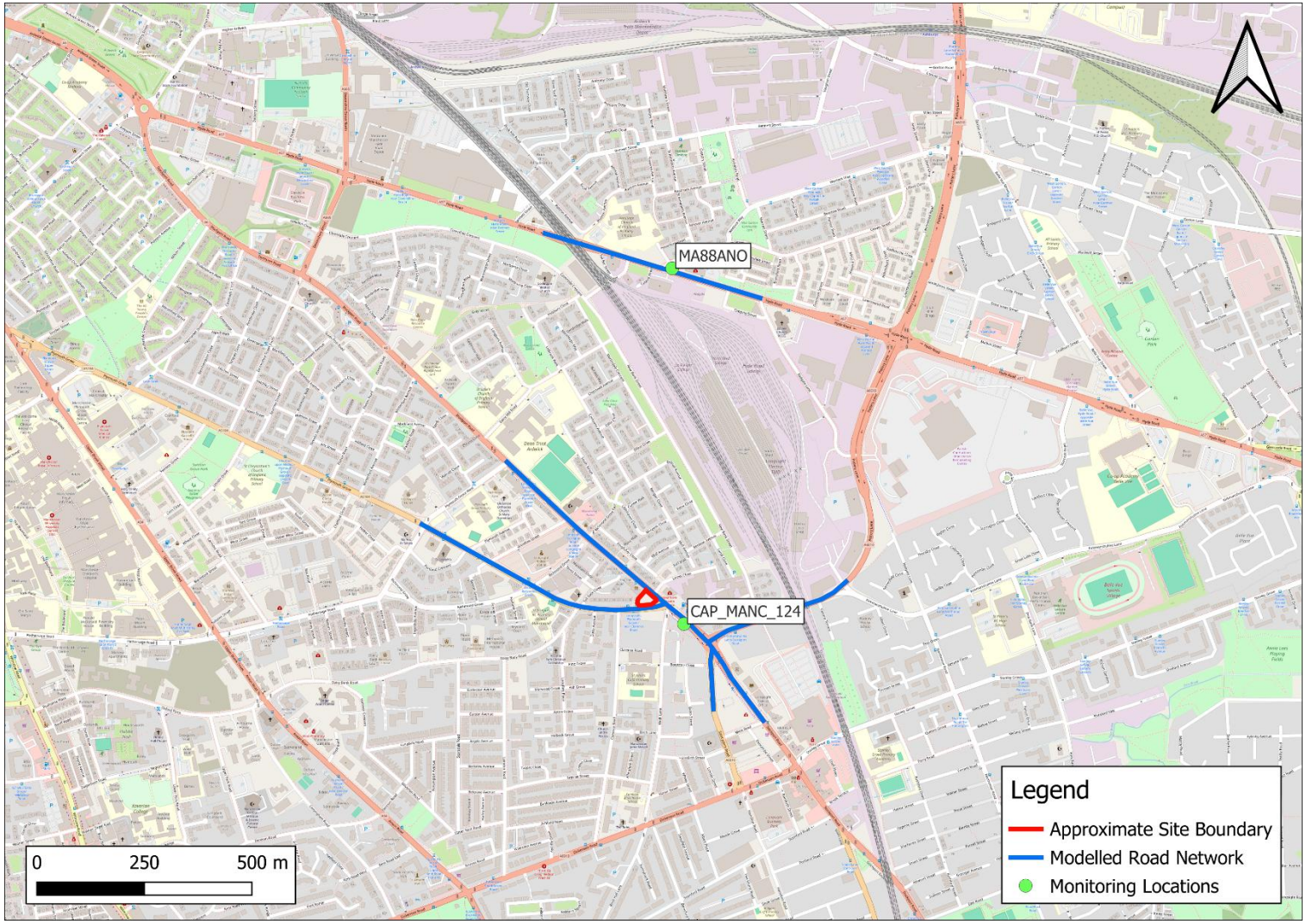


Figure 2: Monitoring Locations and Modelled Road Network



Figure 3: Modelled Receptor Locations

APPENDIX A – REPORT LIMITATIONS

This Report is presented to Shellco 148 Ltd and may not be used or relied on by any other person or by the client in relation to any other matters not covered specifically by the scope of this report.

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APPENDIX B – GLOSSARY

Table B1: Glossary	
Term	**Description**
AADT Annual Average Daily Traffic	A daily total traffic flow (24hrs), expressed as mean daily flow across all 365 days of the year.
Adjustment	Application of a correction factor to modelled results to account for uncertainties in the model.
AQO Air Quality Objective	Policy targets generally expressed as a maximum ambient concentration to be achieved, either without exception or with the permitted number of exceedances within a specific time scale (see also air quality standard).
Ambient air	Outdoor air in the troposphere, excluding workplace air.
Annual mean	the average (mean) of the concentrations measured for each pollutant for one year.
AQMA	Air Quality Management Area.
Conservative	Trending to over predict the impact rather than under predict.
Data Capture	The percentage of all the possible measurements forgiven periods that were validly measured.
Defra	Department for Environment, Food and Rural Affairs.
DfT	Department for Transport.
EFT	Emission Factor Toolkit.
Emission rate	The quantity of a pollutant released from a source over a given period of time.
EPUK	Environmental Protection (UK).
Exceedance	A period of time where the concentration of a pollutant is greater than the appropriate air quality standard.
HDV/HGV	Heavy Duty Vehicle/Heavy Goods Vehicle.
IAQM	Institute of Air Quality Management.
LAQM	Local Air Quality Management.
LDV/LGV	Light Duty Vehicle/Light Goods Vehicle.
Model adjustment	Following model verification, the process by which modelled results are amended. This corrects for systematic error.
NO_2	Nitrogen dioxide.
NO_X	Nitrogen oxides.
PM_{10}	Particulate matter with an aerodynamic diameter of less than 10 micrometres.
$PM_{2.5}$	Particulate matter with an aerodynamic diameter of less than 2.5 micrometres.
Road link	A length of road which is considered to have the same flow of traffic along it. Usually, a link is the road from one junction to the next.
$\mu g/m^3$ micrograms per cubic metre	A measure of concentration in terms of mass per unit volume. A concentration of 1$\mu g/m^3$ means that one cubic metre of air contains one microgram (millionth of a gram) of a pollutant.

APPENDIX C – IAQM CONSTRUCTION DUST ASSESSMENT METHODOLOGY

IAQM Construction Dust Assessment Methodology

Step 1 – Screening the Need for a Detailed Assessment

An assessment will normally be required where there is:

- 'human receptors' within 250 m of the boundary of the site; all within 50 m of the route(s) used by construction vehicles on the public highway, up to 250 m from the site entrance(s); and/ or
- 'ecological receptors' within 50 m of the boundary of the site; or within 50 m of the route(s) used by construction vehicles on the public highway, up to 250 m from the site entrance(s)

For specific (high risk) schemes the planning authority may require dust assessment despite the proposed site falling outside the distances above.

Where the need for more detail assessment is screened out, it can be concluded that the level of risk is 'negligible', and any effects will not be significant.

Step 2a – Define the Potential Dust Emission Magnitude

The dust emission magnitude is based on the scale of the anticipated works and should be classified as Small, Medium, or Large. The following are examples of how the potential dust emission magnitude for different activities can be defined.

Note that, in each case, not all criteria need to be met; other criteria may be used if justified within the assessment. Where relevant, multiple screening assessments may be completed for different development phases (or even sub-phases where demolition may be brief or there is a very short period of intense activity, for example).

Table C1: Construction Dust - Magnitude of Emission

Magnitude	Activity	Criteria
Large	Demolition	- Total volume of building to be demolished greater than 75,000 m^3. - Potentially dusty material (e.g., concrete). - On-site crushing and screening. - Demolition activities more than 12 m above ground level.
	Earthworks	- Total site area greater than 110,000 m^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 6 m in height.
	Construction	- Total building volume greater than 75,000 m^3. - On site concrete batching.

Table C1: Construction Dust - Magnitude of Emission		
Magnitude	**Activity**	**Criteria**
		- 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 100 m.
Medium	Demolition	- Total volume of building to be demolished between 12,000 m^3 and 75,000 m^3. - Potentially dusty construction material. - Demolition activities 6 m to 12 m above ground level.
	Earthworks	- Total site area between 18,000 m^2 and 110,000 m^2. - Moderately dusty soil type (e.g., silt). - Between 5 and 10 heavy earth moving vehicles active at any one time. - Formation of bunds between 3 m and 6 m in height.
	Construction	- Total building volume 12,000 m^3 to 75,000 m^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 50 m to 100 m.
Small	Demolition	- Total volume of building to be demolished less than 12,000 m^3. - Construction material with low potential for dust release (e.g., metal cladding or timber). - Demolition activities less than 6 m above ground.
	Earthworks	- Total site area less than 18,000 m^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 3 m in height.
	Construction	- Total building volume less than 12,000 m^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 50 m.

Step 2b – Define the Sensitivity of the Area

The tables below present the IAQM assessment methodology to determine the sensitivity of the area to soiling, human health and ecological impacts respectively. The IAQM guidance

provides guidance to allow sensitivity of individual receptors 2 to soiling and health effects to assist in the assessment of the overall sensitivity of the study area.

Table C2: Sensitivity of the Area to Dust Soiling Effects					
Receptor Sensitivity	Number of Receptors	Distance from the Source (m)			
		<20	<50	<100	<250
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

Table C3: Sensitivity of the Area to Human Health Impacts						
Receptor Sensitivity	Annual Mean PM_{10} Concentrations ($\mu g/m^3$)	Number of Receptors	Distance from the Source (m)			
			<20	<50	<100	<250
High	>32	>100	High	High	High	Medium
		10-100	High	High	Medium	Low
		1-10	High	Medium	Low	Low
	28-32	>100	High	High	Medium	Low
		10-100	High	Medium	Low	Low
		1-10	High	Medium	Low	Low
	24-28	>100	High	Medium	Low	Low
		10-100	High	Medium	Low	Low
		1-10	Medium	Low	Low	Low
	<24	>100	Medium	Low	Low	Low
		10-100	Low	Low	Low	Low
		1-10	Low	Low	Low	Low
Medium	>32	>10	High	Medium	Low	Low
		1-10	Medium	Low	Low	Low
	28-32	>10	Medium	Low	Low	Low
		1-10	Low	Low	Low	Low
	24-28	>10	Low	Low	Low	Low
		1-10	Low	Low	Low	Low
	<24	>10	Low	Low	Low	Low

Table C3: Sensitivity of the Area to Human Health Impacts						
Receptor Sensitivity	Annual Mean PM_{10} Concentrations ($\mu g/m^3$)	Number of Receptors	Distance from the Source (m)			
			<20	<50	<100	<250
		1-10	Low	Low	Low	Low
Low	-	>1	Low	Low	Low	Low

Table C4: Sensitivity of the Area to Ecological Impacts		
Receptor Sensitivity	Distance from the Source (m)	
	<20	<50
High	High	Medium
Medium	Medium	Low
Low	Low	Low

Step 2c – Define the Risk of Impacts

The dust emissions magnitude determined in Step 2A should be combined with the sensitivity of the area determined at Step 2B to determine the risk of impacts without mitigation applied. For those cases where the risk category is 'negligible' no mitigation measures beyond those required by legislation will be required.

Table C5: Risk of Dust Impacts			
Sensitivity of Surrounding	Dust Emission Magnitude		
	Large	Medium	Small
Demolition			
High	High Risk	Medium Risk	Medium Risk
Medium	High Risk	Medium Risk	Low Risk
Low	Medium Risk	Low Risk	Negligible
Earthworks and Construction			
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible
Trackout			
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible

Step 3 – Site Specific Mitigation

Having determined the risk categories for each of the four activities it is possible to determine the site- specific measures to be adopted. These measures will be related to whether the site is considered to be a low, medium or high risk Site. The IAQM guidance details the mitigation measures required for low, medium and high risk sites as determined in Step 2C.

Step 4 – Determine Significant Effects

Once the risk of dust impacts has been determined in Step 2C under the appropriate dust mitigation measures identified in Step 3, the final steps is to determine whether there are significant effects arising from the construction phase. For almost all construction activities, the application of effective mitigation should prevent any significant effects occurring to sensitive receptors and the residual effects will normally be negligible.

APPENDIX D – MODEL INPUT PARAMETERS

Model Input Parameters

Traffic Flow Data

2025 Base/Verification Year traffic data for use in the assessment, including 24-hour Annual Average Daily Traffic (AADT) flows and fleet composition was obtained from the DfT website.

The data is shown in **Table D1**.

Table D1: 2025 Base and Verification Year Traffic Data

ADMS Road ID	Road Name	AADT	HDV (%)
1	Stockport Road (a)	21829	2.8%
2	Plymouth Grove	8981	1.6%
3	Stockport Road (b)	21829	2.8%
4	Kirkmanshulme Lane	17337	1.8%
5	Saint John's Road	11062	1.1%
6	Hyde Road	26554	3.8%

Roughness Length

The roughness length (z_0) is a modelling parameter applied to allow consideration of surface height roughness elements. A z_0 value of 1 m, as suggested by ADMS-Roads for 'Cities, woodlands' was used to describe the modelling extents and meteorological station location. These z_0 values are considered appropriate for the morphology of their respective areas.

Monin-Obukhov

The Monin-Obukhov Length provides a measure of the stability of the atmosphere. A minimum Monin-Obukhov length of 30 m, as suggested by ADMS-Roads for 'Mixed urban/industrial,' was used to describe the modelling extents and the meteorological station. These values are considered appropriate for the nature of their respective areas.

Model Verification

Introduction

The comparison of modelled concentrations with local monitored concentrations is a process termed 'verification'. Model verification investigates the discrepancies between modelled and measured concentrations, which can arise due to the presence of inaccuracies and/or

uncertainties in model input data, modelling and monitoring data assumptions. The following are examples of potential causes of such discrepancies:

- Estimates of background pollutant concentrations;
- Meteorological data uncertainties;
- Traffic data uncertainties;
- Model input parameters, such as 'roughness length'; and
- Overall limitations of the dispersion model.

Nitrogen Dioxide

Most NO_2 is produced in the atmosphere by the reaction of nitric oxide (NO) with ozone. It is, therefore, most appropriate to verify the model in terms of the primary pollutant emissions of nitrogen oxides (NO_X = NO + NO_2), in line with the guidance provided within LAQM.TG22.

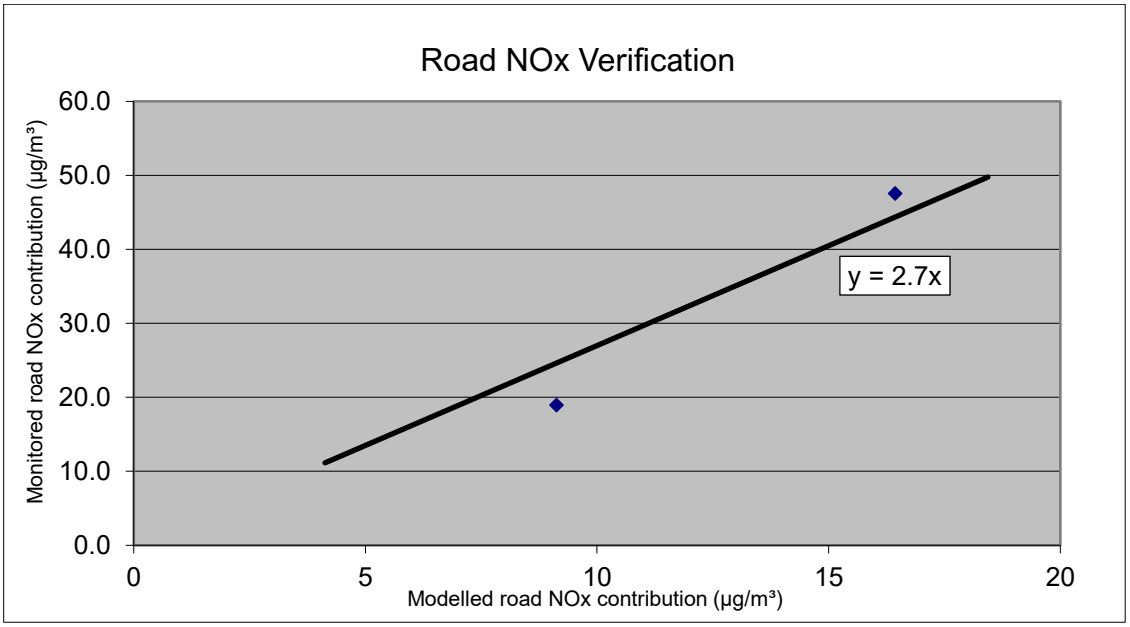
The model has been run to predict the 2025 Base Year annual mean road-NO_X contribution at 2 diffusion tubes within the modelled road network.

The model outputs of road-NO_X have been compared with 'measured' road-NO_X contribution, which was determined from the measured NO_2 concentration at the verification monitor location, utilising the NO_X to NO_2 calculator and 2025 NO_2 background concentration, as shown in **Table D3**.

Table D3: Model Verification

Site ID	2025 Monitored Total NO_2 ($\mu g/m^3$)	2025 Background NO_2 ($\mu g/m^3$)	2025 Monitored Road Contribution NO_X ($\mu g/m^3$)	2025 Modelled Road Contribution NO_X ($\mu g/m^3$)	Ratio
CAP_MANC_124	34.6	15.7	47.5	16.4	2.9
MA88ANO	29.4	16.7	19.0	9.1	2.1

The road NO_X adjustment factor was determined as the slope of the best fit line between the 'measured' road-NO_X contribution and the model derived road contribution, forced through zero, as shown in the graph, overleaf.



This resulted in a factor of **2.7**, and the total NO_2 concentration was determined by importing the adjusted modelled road-NO_X concentration and background NO_2 concentration into the NO_X to NO_2 calculator.

Particulate Matter

No suitable particulate matter monitoring location was available adjacent to the modelled road network for independent verification of road-related PM_{10} and $PM_{2.5}$ concentrations. The road-NO_x verification adjustment factor of **2.7** has therefore also been applied to the modelled road-related particulate matter concentrations. Background PM_{10} and $PM_{2.5}$ concentrations were then added to obtain the predicted total concentrations. This approach provides a conservative allowance for uncertainty in the modelled road contribution, although the NO_x factor has not been independently verified for particulate matter.

Model Uncertainty

An evaluation of model performance has been undertaken to establish confidence in the model results. LAQM.TG22 Identifies a number of statistical procedures that are appropriate to evaluate model performance and assess the uncertainty. These include:

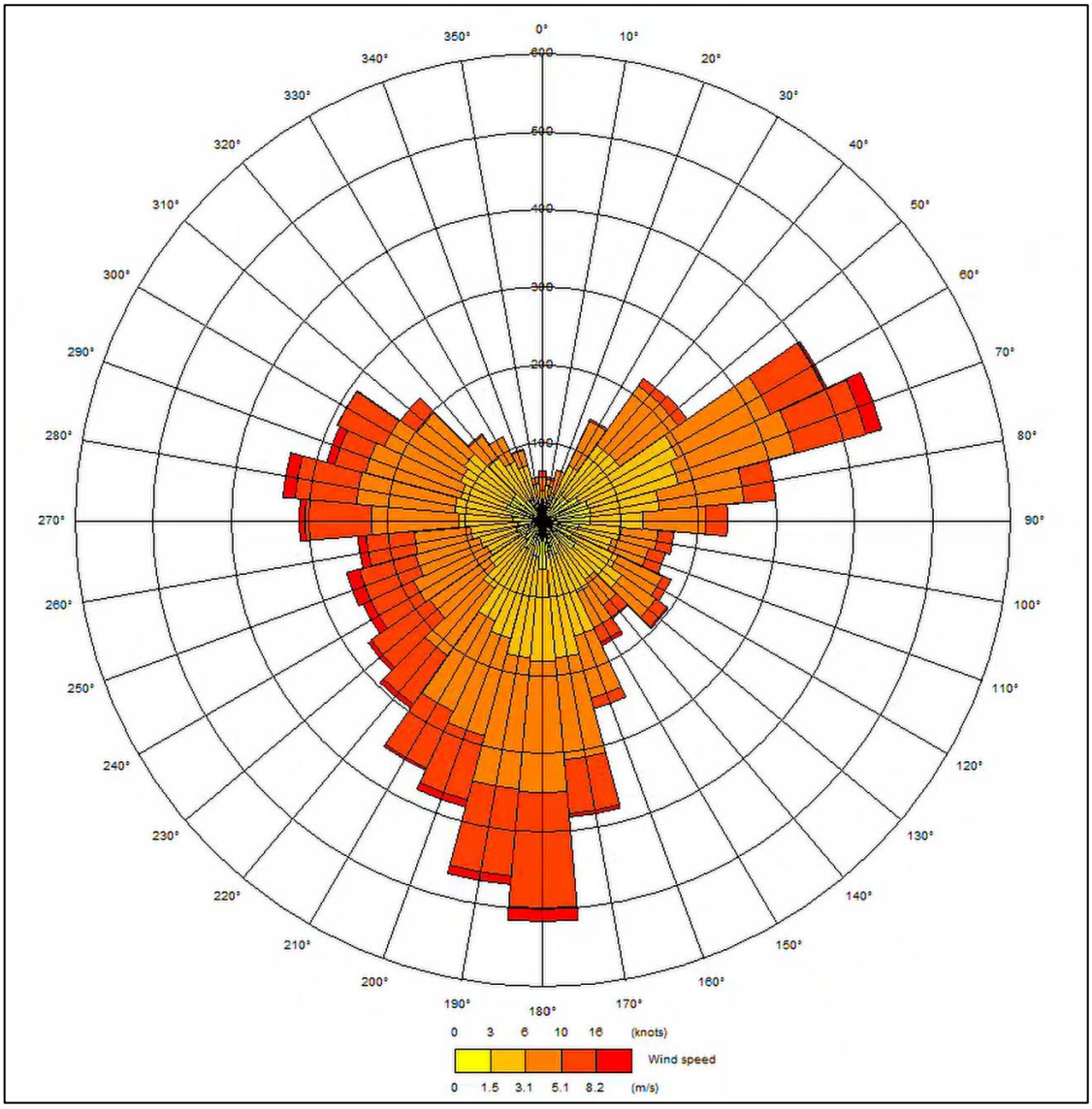
- Correlation coefficient (CC);
- Fractional bias (FB); and
- Root mean square error (RMSE).

These parameters estimate how the model results agree or diverge from the monitored observations. Calculations can be carried out prior to, and after adjustment, and can provide useful information on model improvement. Full details can be found in box 7.17 of LAQM.TG22.

To assess the certainty of a model, the RMSE is the simplest parameter to calculate providing an estimate of the average error of the model in the same unit as the model predictions. It is also often easier to interpret the RMSE over other statistical parameters and therefore it has been calculated in this assessment to understand the model uncertainty.

The post-adjustment RMSE is 1.0 µg/m³, equivalent to 2.5% of the annual mean NO_2 AQO of 40 µg/m³. This is within the ideal benchmark of 10% of the AQO (4 µg/m³) identified in LAQM.TG22, indicating good agreement between monitored and adjusted modelled concentrations. The model performance is therefore considered acceptable for the purposes of this assessment.

APPENDIX E – GFS 2025 WINDROSE FOR NGR: 386477, 395934


0°
10°
20°
30°
40°
50°
60°
70°
80°
90°
100°
110°
120°
130°
140°
150°
160°
170°
180°
190°
200°
210°
220°
230°
240°
250°
260°
270°
280°
290°
300°
310°
320°
330°
340°
350°
600
500
400
300
200
100
0 3 6 10 16 (knots)
Wind speed
0 1.5 3.1 5.1 8.2 (m/s)

APPENDIX F – MODELLING RESULTS

Table F1: Results – 2025 Base/Verification Year Modelled Receptors						
Receptor ID	X (m)	Y (m)	Z (m)	Predicted Annual Mean Concentration ($\mu g/m^3$)		
				NO_2	PM_{10}	$PM_{2.5}$
PR1a	386473	395951	1.5	25.33	17.20	9.94
PR1b	386473	395951	4.5	20.51	15.13	8.84
PR2a	386497	395929	1.5	25.87	17.24	9.96
PR2b	386497	395929	4.5	21.21	15.30	8.93
Rounded to two decimal places						

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