

Air Quality Assessment
Broadford Lane, Chobham

Client: Surrey Heath Borough Council

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Executive Summary

Redmore Environmental Ltd was commissioned by eps consulting on behalf of Surrey Heath Borough Council ('the Client') to undertake an Air Quality Assessment for a parcel of land south of Broadford Lane, Chobham.

The Client is in the process of determining whether the site is suitable for allocation within the emerging Local Plan for up to 16 new pitches for Gypsy, Traveller and Travelling Showpeople. The proposals have the potential to cause air quality impacts as a result of fugitive dust emissions during construction and road traffic exhaust emissions associated with vehicles travelling to and from the site during operation. As such, an Air Quality Assessment was undertaken in order to determine baseline conditions and consider potential effects as a result of the scheme.

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

During the operational phase of the development there is the potential for air quality impacts as a result of traffic exhaust emissions associated with vehicles travelling to and from the site. These were assessed against the relevant screening criteria. Due to the low number of anticipated vehicle trips associated with the proposals, road traffic exhaust emission impacts were not predicted to be significant.

Based on the assessment results, it is concluded that air quality factors are not considered a constraint to the use of the site for Gypsy and Traveller accommodation.

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Appendix 1 - Curricula Vitae

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1.0 INTRODUCTION

1.1 <u>Background</u>

- 1.1.1 Redmore Environmental Ltd was commissioned by eps consulting on behalf of Surrey Heath Borough Council ('the Client') to undertake an Air Quality Assessment for a parcel of land south of Broadford Lane, Chobham, which is being considered for allocation for Gypsy and Traveller use within the emerging Surrey Heath Local Plan.
- 1.1.2 The proposals have the potential to cause air quality impacts as a result of fugitive dust emissions during construction and road traffic exhaust emissions associated with vehicles travelling to and from the site during operation. As such, an Air Quality Assessment was undertaken in order to determine baseline conditions and consider potential effects as a result of the scheme.

1.2 <u>Site Location and Context</u>

- 1.2.1 The site is located off Broadford Lane, Chobham, at approximate National Grid Reference (NGR): 497474, 161095. Reference should be made to Figure 1 for a site location plan.
- 1.2.2 The Client is in the process of determining whether the site is suitable for allocation for Gypsy and Traveller use within the emerging Surrey Heath Local Plan. The site was included within the Surrey Heath Local Plan: Preferred Options (2019 2038) Further Gypsy and Traveller and Travelling Showpeople Allocations Regulation 18 consultation, which was undertaken between August September 2022. Whilst the consultation identifies the site as having potential capacity for up to 16 pitches, the provisional indicative development plans prepared following the consultation show two possible options for the development ranging between 10 and 13 pitches.
- 1.2.3 The development has the potential to cause air quality impacts at sensitive locations. These may include fugitive dust emissions associated with construction works and road traffic exhaust emissions from vehicles travelling to and from the site during the operational phase. An Air Quality Assessment was therefore undertaken in order to determine baseline conditions and consider potential air quality effects as a result of the proposals. This is detailed in the following report.

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2.0 LEGISLATION AND POLICY

2.1 <u>Legislation</u>

- 2.1.1 The Air Quality Standards Regulations (2010) and subsequent amendments include Air Quality Limit Values (AQLVs) for the following pollutants:
 - Nitrogen dioxide (NO₂);
 - Sulphur dioxide;
 - Lead;
 - Particulate matter with an aerodynamic diameter of less than 10µm (PM₁₀);
 - 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 28th April 2023¹. 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 2023² was published in January 2023, providing long term and Interim Targets in order to reduce population exposure to PM_{2.5}. The concentration target for 2040 was subsequently adopted in the Environmental Targets (Fine Particulate Matter) (England) Regulations (2023).

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

² Environmental Improvement Plan 2023, DEFRA, 2023.

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

Table 1 Air Quality Objectives/ Interim Target

Pollutant	Air Quality Objective/ Interim 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}	12 ^(a)	Annual mean			

Note: (a) Interim Target to be achieved by end of January 2028.

2.1.6 Table 2 summarises the advice provided in DEFRA guidance³ 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
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

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

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Averaging Period	Objective Should Apply At	Objective Should Not Apply At
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)	Kerbside sites where the public would not be expected to have regular access
	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	

2.2 Local Air Quality Management

2.2.1 Local Authorities (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 <u>Dust</u>

- 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."
- 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

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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 <u>National Planning Policy</u>

- 2.4.1 The revised National Planning Policy Framework⁴ (NPPF) was published in December 2023 and 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 protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."
- 2.4.3 Chapter 15 of the NPPF details objectives in relation to conserving and enhancing the natural environment. It states that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

[...]

e) preventing new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality [...]"

⁴ NPPF, Ministry of Housing, Communities and Local Government, 2023.

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2.4.4 The NPPF specifically recognises air quality as part of delivering sustainable development and states that:

"Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan."

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

2.5 National Planning Practice Guidance

- 2.5.1 The National Planning Practice Guidance⁵ (NPPG) web-based resource was launched by the Department for Communities and Local Government on 6th March 2014 and updated on 1st November 2019 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?

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

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

2.6 Local Planning Policy

2.6.1 The Surrey Heath Local Plan currently consists of the Core Strategy and Development Management Policies 2011 - 20286, which was adopted by Surrey Heath Borough Council (SHBC) on 1st February 2012, the Camberley Town Centre Area Action Plan 2011 – 20287, adopted on 16th July 2014 and saved policies of the Surrey Heath Local Plan 20008, which was adopted on 8th December 2000. Review of these documents did not reveal any planning policies of relevance to this assessment.

⁶ Core Strategy and Development Management Policies 2011 - 2028, SHBC, 2012.

⁷ Camberley Town Centre Area Action Plan 2011 – 2028, SHBC 2014.

⁸ Surrey Heath Local Plan 2000, SHBC, 2000.

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3.0 METHODOLOGY

3.1 <u>Introduction</u>

3.1.1 The proposed development has the potential to cause air quality impacts as a result of fugitive dust emissions during construction and road traffic exhaust emissions associated with vehicles travelling to and from the site during operation. These have been assessed in accordance with the following methodology.

3.2 <u>Construction Phase Assessment</u>

- 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 V2.1'9.
- 3.2.2 Activities on the proposed construction site have been divided into three types to reflect their different potential impacts. These are:
 - 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 PM₁₀.
- 3.2.4 The assessment steps are detailed below.

⁹ Guidance on the Assessment of Dust from Demolition and Construction V2.1, IAQM, 2023.

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Step 1

- 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

- 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	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

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Magnitude	Activity	Criteria
	Construction	 Total building volume greater than 75,000m³ 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	Earthworks	 Total site area 18,00m² to 110,000m² 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 12,000m³ to 75,000m³ 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	Earthworks	 Total site area less than 18,000m² 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 4m in height
	Construction	 Total building volume less than 12,000m³ 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

3.2.13 Step 2B defines the sensitivity of the area around the development to potential dust impacts. The influencing factors are shown in Table 4.

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Table 4 Construction Dust - Examples of Factors Defining Sensitivity of an Area

Receptor Sensitivity	Examples					
Sensitivity	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 PM₁₀. 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				

- 3.2.14 The guidance also provides the following factors to consider when determining the sensitivity of an area to potential dust impacts:
 - Any history of dust generating activities in the area;
 - The likelihood of concurrent dust generating activity on nearby sites;
 - Any pre-existing screening between the source and receptors;
 - Any conclusions drawn from analysing local meteorological data which accurately represent the area; and if relevant the season during which works will take place;
 - Any conclusions drawn from local topography;
 - Duration of the potential impact, as a receptor may become more sensitive over time; and,

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- Any known specific receptor sensitivities which go beyond the classifications given in the document.
- 3.2.15 These factors were considered in the undertaking of this assessment.
- 3.2.16 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)					
Sensitivity	receptors	Less than 20	Less than 50	Less than 100	Less than 350		
High	More than 100	High	High	Low	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		

3.2.17 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			Distance from the Source (m)				
Sensitivity	PM ₁₀ Concentration	Receptors	Less than 20	Less than 50	Less than 100	Less than 200	Less than 350
High	Greater than 32µg/m³	More than 100	High	High	High	Medium	Low
		10 - 100	High	High	Medium	Low	Low
		1 - 10	High	Medium	Low	Low	Low
	28 - 32µg/m³	More than 100	High	High	Medium	Low	Low
		10 - 100	High	Medium	Low	Low	Low
		1 - 10	High	Medium	Low	Low	Low

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Receptor	Background	Number	Distance from the Source (m)				
Sensitivity	Annual Mean PM ₁₀ Concentration	of Receptors	Less than 20	Less than 50	Less than 100	Less than 200	Less than 350
	24 - 28µg/m³	More than 100	High	Medium	Low	Low	Low
		10 - 100	High	Medium	Low	Low	Low
		1 - 10	Medium	Low	Low	Low	Low
	Less than 24µg/m³	More than 100	Medium	Low	Low	Low	Low
		10 - 100	Low	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low	Low
Medium	Greater than 32µg/m³	More than 10	High	Medium	Low	Low	Low
		1 - 10	Medium	Low	Low	Low	Low
	28 - 32µg/m³	More than 10	Medium	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low	Low
	24 - 28µg/m³	More than 10	Low	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low	Low
	Less than 24µg/m³	More than 10	Low	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low	Low
Low	-	1 or more	Low	Low	Low	Low	Low

3.2.18 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	Medium	Medium
Medium	Medium	Low

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

- 3.2.19 Step 2C combines the dust emission magnitude with the sensitivity of the area to determine the risk of unmitigated impacts.
- 3.2.20 Table 8 outlines the risk category from earthworks and construction activities.

Table 8 Construction Dust - Dust Risk Category from Earthworks and Construction Activities

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

3.2.21 Table 9 outlines the risk category from trackout activities.

Table 9 Construction Dust - Dust Risk Category from Trackout Activities

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

Step 3

3.2.22 Step 3 requires the identification of site specific mitigation measures within the IAQM guidance¹⁰ to reduce potential dust impacts based upon the relevant risk categories

Guidance on the Assessment of Dust from Demolition and Construction V2.1, IAQM, 2023.

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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

- 3.2.23 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 effective mitigation. Experience shows that this is normally possible. Hence the residual effect will normally be not significant.
- 3.2.24 The determination of significance relies on professional judgement and reasoning should be provided as far as practicable. The IAQM guidance suggests the provision of details of the assessor's qualifications and experience. These are provided in Appendix 1.

3.3 Operational Phase Assessment

- 3.3.1 The development has the potential to increase concentrations of NO₂, PM₁₀ 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. A screening assessment was therefore undertaken using the criteria contained within the IAQM 'Land-Use Planning & Development Control: Planning for Air Quality'¹¹ guidance to determine the potential for trips generated by the development to affect local air quality.
- 3.3.2 The IAQM guidance¹² provides the following criteria to help establish when an assessment of potential impacts on the local area is likely to be considered necessary:
 - A change of Light Duty Vehicle (LDV) flows of more than 100 Annual Average Daily
 Traffic (AADT) within or adjacent to an AQMA or more than 500 AADT elsewhere;
 - A change of HDV flows of more than 25 AADT within or adjacent to an AQMA or more than 100 AADT elsewhere;

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

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

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 Realignment of roads where the change is 5m or more and the road is within an AQMA; or,

- Introduction of a new junction or removal of an existing junction near to relevant receptors.
- 3.3.3 Should these criteria not be met, then the IAQM guidance¹³ considers air quality impacts associated with a scheme to be **not significant** and no further assessment is required.
- 3.3.4 Should screening of the relevant data indicate that any of the above criteria are met, then potential impacts at sensitive receptor locations can be assessed by calculating the change in pollutant concentrations as a result of the proposed development. The significance of predicted impacts can then be determined in accordance with the methodology outlined in the IAQM guidance¹⁴.

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

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

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4.0 BASELINE

4.1 <u>Introduction</u>

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), SHBC has undertaken Review and Assessment of air quality within their area of jurisdiction. This process has indicated that annual mean concentrations of NO₂ and 24-hour mean concentrations of PM₁₀ are above the AQOs within the borough. As such, one AQMA has been declared. This is described as follows:

"The strip of land from Frimley Road Camberley to Ravenswood Roundabout Camberley which embraces the M3 Motorway and the houses on both side of the motorway which border the highway."

- 4.2.2 The Surrey Heath AQMA is located approximately 8km west of the development. It is considered unlikely the proposals would cause air quality impacts over a distance of this magnitude. As such, the AQMA has not been considered further in the context of this assessment.
- 4.2.3 SHDC 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 SHDC throughout their area of jurisdiction.

Recent NO₂ concentrations recorded in the vicinity of the development are shown in Table 10.

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Table 10 Monitoring Results

Monitoring Site		Monitored NO ₂ Concentration (µg/m³)		
		2016	2017	2018
SH21	Benner Lane	21.4	21.4	21.9
SH24	High Street, Chobham	34.9	32.4	33.6

- 4.3.2 As shown in Table 10, annual mean NO₂ concentrations were below the AQO of 40µg/m³ at the SH21 and SH24 monitors in recent years. Reference should be made to Figure 2 for a map of the survey positions.
- 4.3.3 SHBC do not undertake PM₁₀ or PM_{2.5} monitoring within the vicinity of the site.

4.4 <u>Background Pollutant Concentrations</u>

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: 497500, 161500. Data for this location was downloaded from the DEFRA website¹⁵ for the purpose of the assessment and is summarised in Table 11.

Table 11 Background Pollutant Concentration Predictions

Pollutant	Predicted 2023 Background Pollutant Concentration (µg/m³)
NO ₂	10.66
PM ₁₀	13.11
PM _{2.5}	9.05

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 Interim Target at the development site.

http://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018.

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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 earthworks and construction were identified from a desk-top study of the area up to 350m from the development boundary. These are summarised in Table 12.

Table 12 Earthworks and Construction Dust Sensitive Receptors

Distance from Site Boundary (m)	Approximate Number of Human Receptors	Approximate Number of Ecological Receptors ^(a)
Up to 20	1 - 10	0
Up to 50	1 - 10	0
Up to 100	10 - 100	-
Up to 350	10 - 100	-

Note: (a) Ecological receptors are only considered within 50m of the site boundary.

4.5.2 Receptors sensitive to potential dust impacts from trackout were identified from a desktop study of the area up to 50m from the road network within 500m 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
Up to 20	10 - 100	0
Up to 50	10 - 100	0

- 4.5.3 There are no ecological receptors within 50m of the development boundary or the access route within 500m of the site entrance. As such, ecological impacts have not been assessed further within this report.
- 4.5.4 A number of additional factors have been considered when determining the sensitivity of the surrounding area. These are summarised in Table 14.

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Table 14 Additional Area Sensitivity Factors to Potential Dust Impacts

Guidance	Comment
Whether there is any history of dust generating activities in the area	The baseline review did not indicate any dust generating activities in the local area
The likelihood of concurrent dust generating activity on nearby sites	A review of the planning portal indicated a number of applications have recently been submitted in the vicinity of the site. It is therefore possible that these schemes will result in concurrent dust generation should they be granted consent and the construction phases overlap with that of the proposal
Pre-existing screening between the source and the receptors	Trees and shrubs are located along the site boundary. These may act as a barrier between emission sources and receptors should they be retained during construction
Conclusions drawn from analysing local meteorological data which accurately represent the area: and if relevant the season during which works will take place	As shown in Figure 3, the predominant wind bearing at the site is from the south-west. As such, receptors to the north-east of the boundary are most likely to be affected by dust releases
Conclusions drawn from local topography	There are no significant topographical constraints to dust dispersion
Duration of the potential impact, as a receptor may become more sensitive over time	Currently it is unclear as to the duration of the construction phase. However, it is possible that it will extend over one year. The sensitivity of nearby receptors is unlikely to change during this time
Any known specific receptor sensitivities which go beyond the classifications given in the document	No specific receptor sensitivities identified during the baseline assessment

- 4.5.5 Dust sensitive receptors within 350m of the development site include places of work and residential dwellings. These are considered to be of **medium** and **high** sensitivity, respectively. It should be noted that only receptors of **medium** sensitivity are present within 50m of the boundary.
- 4.5.6 The sensitivity of the receiving environment to specific potential dust impacts, based on the criteria shown in Section 3.2, is shown in Table 15.

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Table 15 Sensitivity of the Surrounding Area to Potential Dust Impacts

Potential Impact	Sensitivity of the Surrounding Area		
	Earthworks Construction Trackout		Trackout
Dust Soiling	Medium	Medium	Medium
Human Health	Medium	Medium	High

4.6 <u>Site Suitability</u>

4.6.1 The potential allocation would comprise residential land use. This is considered a location of relevant exposure to elevated pollutant concentrations in accordance with DEFRA guidance¹⁶. However, the site is not located within an AQMA and recent NO₂ monitoring results recorded in the vicinity of the site have indicated compliance with the relevant AQO. As such, exposure of future residents to exceedences of the relevant AQOs is not predicted and the location is considered suitable for the proposed end use.

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

Ref: 5984



5.0 ASSESSMENT

5.1 <u>Introduction</u>

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

Step 1

- 5.2.1 The undertaking of activities such as excavation, ground works, cutting, 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 350m of the site boundary. As such, a detailed assessment of potential dust impacts was required.

Step 2

Earthworks

- 5.2.4 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 18,000m². In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from earthworks is therefore **small**.
- 5.2.5 Table 15 indicates the sensitivity of the area to dust soiling effects on people and property is **medium**. In accordance with the criteria outlined in Table 8, the development is considered to be a **low** risk site for dust soiling as a result of earthworks.

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5.2.6 Table 15 indicates the sensitivity of the area to human health impacts is **medium**. In accordance with the criteria outlined in Table 8, the development is considered to be a **low** risk site for human health impacts as a result of earthworks.

Construction

- 5.2.7 Due to the size of the development, the total building volume will be between 12,000m³ and 75,000m³. In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from construction is therefore **medium**.
- 5.2.8 Table 15 indicates the sensitivity of the area to dust soiling effects on people and property is **medium**. In accordance with the criteria outlined in Table 8, the development is considered to be a **medium** risk site for dust soiling as a result of construction activities.
- 5.2.9 Table 15 indicates the sensitivity of the area to human health impacts is **medium**. In accordance with the criteria outlined in Table 8, the development is considered to be a **medium** risk site for human health impacts as a result of construction activities.

<u>Trackout</u>

- 5.2.10 Based on the site area and existing hardstanding, it is anticipated that the unpaved road length will be between 50m and 100m. In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from trackout is therefore **medium**.
- 5.2.11 Table 15 indicates the sensitivity of the area to dust soiling effects to people and property is **medium**. In accordance with the criteria outlined in Table 9, the development is considered to be a **medium** risk site for dust soiling as a result of trackout activities.
- 5.2.12 Table 15 indicates the sensitivity of the area to human health impacts is **high**. In accordance with the criteria outlined in Table 9, the development is considered to be a **medium** risk site for human health impacts as a result of trackout activities.

Summary of the Risk of Dust Effects

5.2.13 A summary of the risk from each dust generating activity is provided in Table 16.

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Table 16 Summary of Potential Unmitigated Dust Risks During Construction

Potential Impact	Risk		
	Earthworks	Construction	Trackout
Dust Soiling	Low	Medium	Medium
Human Health	Low	Medium	Medium

- 5.2.14 As indicated in Table 16, the potential risk of dust soiling is **medium** from construction and trackout and **low** from earthworks. The potential risk of human health impacts is **medium** from construction and trackout and **low** from earthworks.
- 5.2.15 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.

Step 3

5.2.16 The IAQM guidance¹⁷ 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 17. These may be reviewed prior to the commencement of construction works and incorporated into a Construction Environmental Management Plan or similar if required by the LA.

Guidance on the Assessment of Dust from Demolition and Construction V2.1, IAQM, 2023.

Ref: 5984



Table 17 Fugitive Dust Emission Mitigation Measures

Issue	Control Measure
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) or similar, which may include measures to control other emissions, approved by the LA
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 to monitor compliance with the DMP, 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
	Fully enclose specific operations where there is a high potential for dust production and they are active for an extensive period
	Avoid site runoff of water or mud
	Keep site fencing, barriers and scaffolding clean using wet methods
	Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used
	Cover, seed or fence stockpiles to prevent wind whipping
Operating vehicle/machinery	Ensure all vehicles switch off engines when stationary - no idling vehicles
and sustainable travel	Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable

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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	
	Ensure equipment is available to clean any dry spillages, and clean up spillages as soon as reasonably practicable using wet cleaning methods	
Waste management	No bonfires and burning of waste materials	
Construction	Avoid scabbling (roughening of concrete surfaces), if possible	
	Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out	
Trackout	Use water-assisted dust sweeper on access and local roads, if required	
	Avoid dry sweeping of large areas	
	Ensure vehicles entering and leaving site are covered to prevent escape of materials	
	Implement a wheel washing system, if required	
	Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit	
	Access gates to be located at least 10m from receptors, where possible	

Step 4

5.2.17 Assuming the relevant mitigation measures outlined in Table 17 are implemented, the residual impact from all dust generating activities is predicted to be **not significant**, in accordance with the IAQM guidance¹⁸.

5.3 Operational Phase Assessment

5.3.1 Any vehicle movements associated with the proposals will generate exhaust emissions on the local and regional road networks. Information provided by Motion Consultants Limited, the Transport Consultants for the project, indicated that development is anticipated to generate a maximum 152 daily trips, five of which will be HDVs.

¹⁸ Guidance on the Assessment of Dust from Demolition and Construction V2.1, IAQM, 2023.

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5.3.2 Based on the information above, the development is not predicted to result in an increase in LDV flows of more than 500 AADT on any individual road link. Additionally, the proposals do not include significant highway realignment or the introduction of a junction and there will not be a requirement for than 100 HDV deliveries 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 IAQM¹⁹ criteria shown in Section 3.3.

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

Ref: 5984



6.0 CONCLUSION

- 6.1.1 Redmore Environmental Ltd was commissioned by eps consulting on behalf of Surrey Heath Borough Council ('the Client') to undertake an Air Quality Assessment for a parcel of land south of Broadford Lane, Chobham, which is being considered as a potential allocation for Gypsy and Traveller use within the emerging Surrey Heath Local Plan. .
- 6.1.2 The proposals have the potential to cause air quality impacts as a result of fugitive dust emissions during construction and road traffic exhaust emissions associated with vehicles travelling to and from the site during operation. As such, an Air Quality Assessment was undertaken in order to determine baseline conditions and consider potential effects as a result of the scheme.
- 6.1.3 During the construction phase of the development there is the potential for air quality impacts as a result of fugitive dust emissions from the site. These were assessed in accordance with the IAQM methodology. Assuming good practice dust control measures are implemented, the residual significance of potential air quality impacts from dust generated by earthworks, construction and trackout activities was predicted to be not significant.
- 6.1.4 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 screening criteria provided within the IAQM²⁰ guidance. Due to the low number of anticipated vehicle trips associated with the proposals, air quality impacts were predicted to be **not significant**.
- 6.1.5 Based on the assessment results, it is concluded that air quality factors are not considered a constraint to use of the site for residential development.

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

Ref: 5984



7.0 ABBREVIATIONS

PM_{2.5}

SHBC

AADT Annual Average Daily Traffic **AQLV** Air Quality Limit Value **AQMA** Air Quality Management Area AQO Air Quality Objective **AQS** Air Quality Strategy **DEFRA** Department for Environment, Food and Rural Affairs DMP Dust Management Plan HDV Heavy Duty Vehicle **IAQM** Institute of Air Quality Management LA Local Authority LAQM Local Air Quality Management LDV Light Duty Vehicle NGR National Grid Reference NO_2 Nitrogen dioxide **NPPF** National Planning Policy Framework NPPG National Planning Policy Guidance Particulate matter with an aerodynamic diameter of less than 10µm PM₁₀

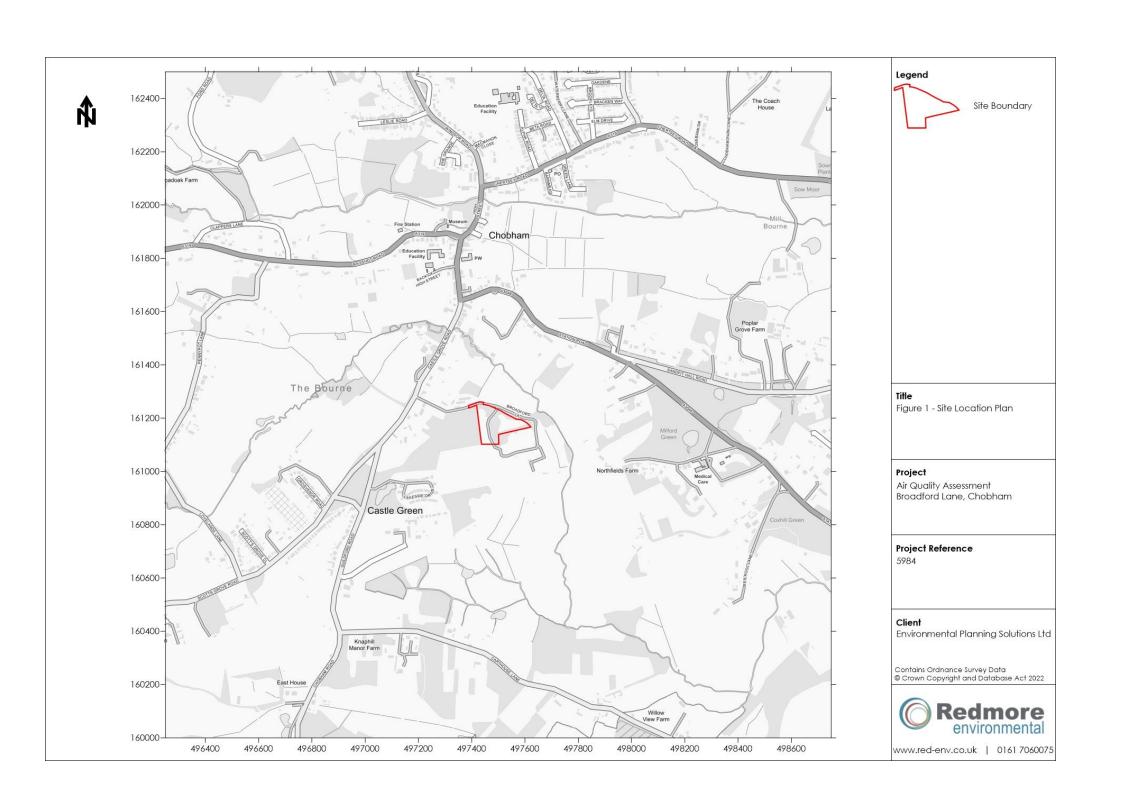
Particulate matter with an aerodynamic diameter of less than 2.5µm

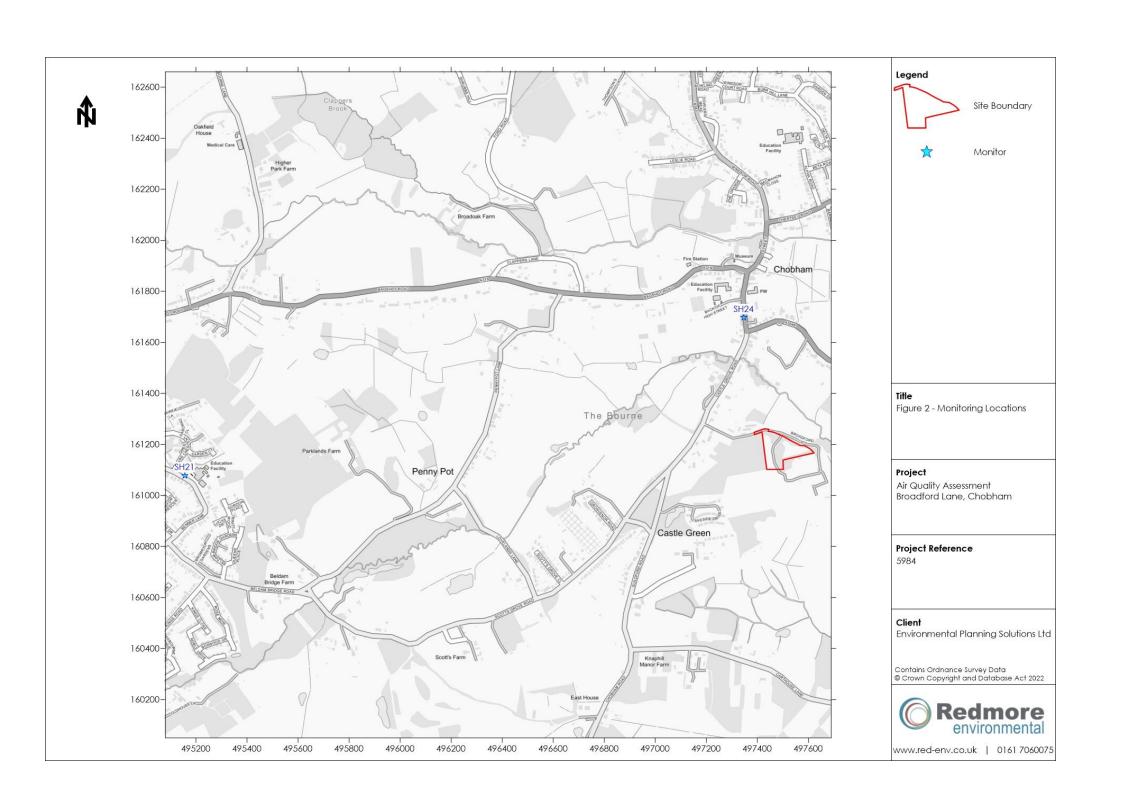
Surrey Heath Borough Council

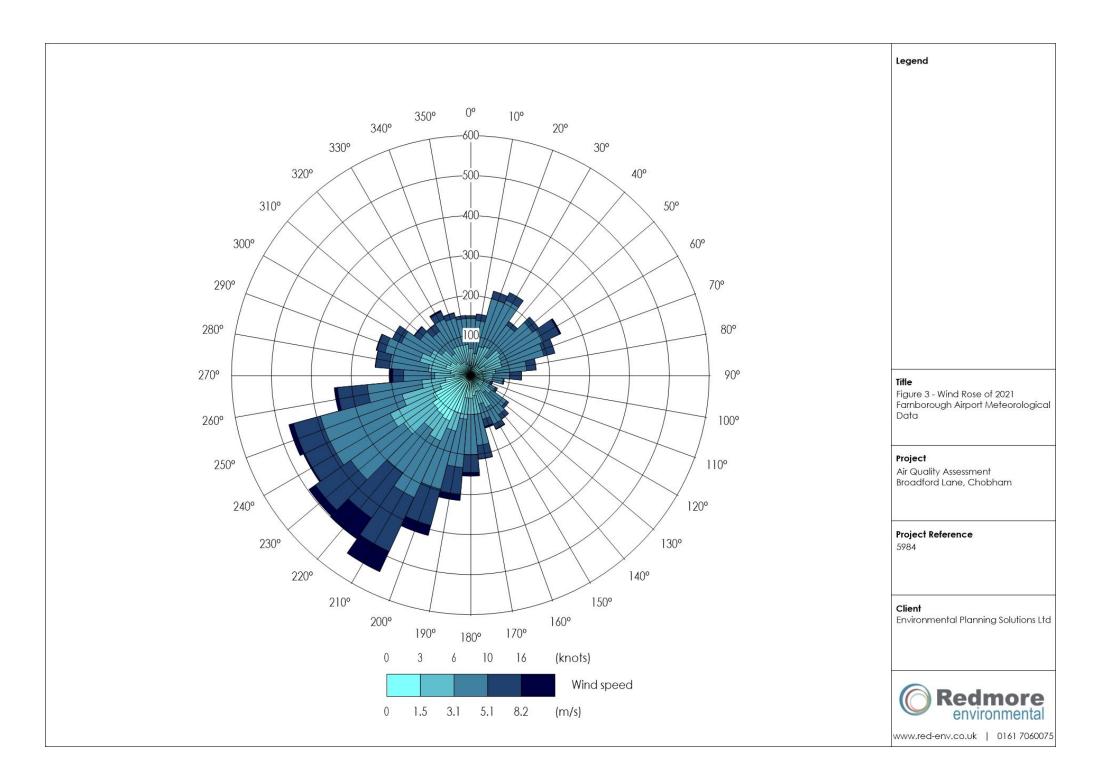
Ref: 5984



Figures







Date: 12th September 2023

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Appendix 1 - Curricula Vitae

JETHRO REDMORE

Director

BEng (Hons), MSc, MIAQM, MIEnvSc, PIEMA, CEnv



KEY EXPERIENCE:

Jethro is a Chartered Environmentalist and Director of Redmore Environmental with specialist experience in the air quality and odour sectors. His key capabilities include:

- Production and management of Air Quality, Dust and Odour Assessments for a wide-range of clients from the retail, residential, infrastructure, commercial and industrial sectors.
- Production and co-ordination of Environmental Permit applications for a variety of industrial sectors.
- Detailed dispersion modelling of road vehicle and industrial emissions using ADMS-Roads, ADMS-5, AERMOD-PRIME and BREEZE-ROADS. Studies have included impact assessment of ground level pollutant and odour concentrations and assessment of suitability of development sites for proposed end-use.
- Project management and co-ordination of Environmental Impact Assessments and scoping reports for developments throughout the UK.
- Provision of expert witness services at Planning Inquiries.
- Design and project management of pollutant monitoring campaigns.
- Co-ordination and management of large-scale multi-disciplinary projects and submissions.
- Provision of expert advice to local government and international environmental bodies, as well as involvement in production of industry guidance.

SELECT PROJECTS SUMMARY:

Industrial

Shanks Waste Management -Odour Assessments of two waste management facilities to support Environmental Permit Applications.

Tatweer Petroleum - dispersion modelling of Bahrain oil field.

Doha South Sewage Treatment Works - AQA for works extension in Qatar.

IRIS Environmental Appraisal Report Reviews, Isle of Man Government - odour assessment reviews.

Lankem, Greater Manchester -Environmental Permit Application for chemical manufacturing plant.

Newport Docks Bulk Drying, Pelleting and CHP Facility - air quality EIA for gas CHP.

Springshades, Leicester -Environmental Permit Variation Application for textile manufacturing plant.

Valspar, Chester - Odour Assessment and production of Odour Management Plan for a paint manufacturing plant in response to neighbour complaints.

Agrivert - dispersion modelling of odour and CHP emissions from numerous AD plants.

James Cropper Paper Mill, Cumbria - air quality EIA, Environmental Permit Variation and Human Health Risk Assessment for new biomass boiler adjacent to SSSI.

Rigg Approach, Leyton - Air Quality Assessment in support of waste transfer site.

Lynchford Lane Waste Transfer Station - biomass facility energy recovery plant.

Barnes Wallis Heat and Power, Cobham - biomass facility adjacent to AQMA.

Residential

Wood St Mill, Bury - residential development adjacent to scrap metal yard.

Hyams Lane, Holbrook - Odour Assessment to support residential development adjacent to sewage works.

North Wharf Gardens, London peer review of EIA undertaken for large residential development.

Loxford Road, Alford - Air Quality EIA for residential development, included consideration of impacts from associated package sewage works

Elephant and Castle Leisure Centre - baseline AQA for redevelopment.

Carr Lodge, Doncaster - EIA for large residential development.

Queensland Road, Highbury - residential scheme including CHP.

Bicester Ecotown - dispersion modelling of energy centre.

Castleford Growth Delivery Plan baseline air quality constraints assessment for town redevelopment.

York St, Bury - residential development adjacent to AQMA.

Temple Point Leeds - residential development adjacent to M1.

Commercial and Retail

Etihad Stadium - Air Quality EIA for the extension to the capacity of the Etihad Stadium, Manchester.

Wakefield College - redevelopment of city centre campus in AQMA.

Manchester Airport Cargo Shed - commercial development.

Manchester Airport Apron Extension - EIA including aircraft emission modelling.

National Youth Theatre, Islington - redevelopment to provide new arts space and accommodation.

AMELIA REED

Principal Air Quality Consultant

BSc (Hons), MIAQM, AMIEnvSc

Tel: 0161 706 0075 | Email: amelia.reed@red-env.co.uk



KEY EXPERIENCE:

Amelia is a Principal Environmental Consultant with specialist experience in the air quality sector. Her key capabilities include:

- Production of Air Quality
 Assessments in accordance with Department for Environment, Food and Rural Affairs (DEFRA) methodologies for a range of residential, commercial and industrial sectors.
- Detailed dispersion modelling of road vehicle and industrial emissions using ADMS-Roads and ADMS-5. Studies have included impact assessment of ground level pollutant and odour concentrations and assessment of suitability of development sites for proposed end-use.
- Project management and co-ordination of Environmental Impact Assessments (EIAs) and scoping reports for developments throughout the UK.
- Advanced canyon modelling to evaluate the impact of altered urban topography on air quality in built up areas.
- Air quality monitoring at industrial sites to quantify pollutant concentrations.
- Assessment of fugitive dust impacts from a range of mineral extraction developments.
- Production of air quality mitigation strategies specifically tailored to address issues at individual sites.
- Odour surveys to assess amenity and suitability of sites for potential future development for residential use.

SELECT PROJECTS SUMMARY:

Bradley Road, Huddersfield

Air Quality EIA in support of a hybrid planning application for a residential development on land off Bradley Road, Huddersfield. This included a detailed application for circa 300 units and an outline application for the remainder of the site allocation of +1,000 dwellings. Dispersion modelling was undertaken due to the proximity of nearby Air Quality Management Areas (AQMAs). Using sensitive receptors located in areas where increased road traffic may affect pollutant levels, a comparison was made between concentrations with and without the development in place. Site suitability for residential use due to potential constraints associated with vehicle emissions from the M62 and odour emissions from an adjacent landfill site and poultry farm, was also considered.

Kingston Road, New Malden

Air Quality Neutral Assessment for a mixed-use development in Kingston upon Thames to determine compliance with the London Plan requirements. This indicated an acceptable level of emissions from the scheme and the development was considered to be air quality neutral.

The Burrell Collection Museum, Glasgow

Air Quality Assessment in support of an energy centre at an existing museum. The scheme included provision of three gas fired boilers. Concerns were raised the proximity of the flues to the building intake and surrounding Pollok Country Park. Impacts associated with emissions from the proposed gas boilers were assessed through detailed dispersion modelling using ADMS-5. This indicated impacts on annual mean NO₂ and PM₁₀ concentrations were predicted to be not significant.

Magnitude, Middlewich

Air Quality EIA and a number of Air Quality Assessments in support of Phases 1b, 3, 4a, 4b and Plot 1c of the Magnitude sites in Middlewich. Detailed dispersion modelling was undertaken with the inclusion of advanced canyon modelling to evaluate the impact of the urban topography within the locality on the dispersion of traffic related pollutants, particularly with in AQMAs nearby. The Results indicated the in-combination impacts were not significant.

Rookery Avenue, Whiteley

Odour Impact Assessment in support of a hot food takeaway with a drive thru facility in Whiteley. The assessment considered the scale and nature of potential emissions, the location of nearest receptors and the proposed cooking type in accordance with the relevant DEFRA guidance. An appropriate ventilation system was identified and described on the basis of the assessment results. The scheme was granted planning permission.

Old Knotty Way, Uttoxeter

Air Quality Assessment in support an Aldi food store and associated facilities. Concerns had been raised in relation to the impacts during the operational phase of the proposals. Changes in pollution levels were therefore considered at sensitive receptors as a result of variations to road geometry and associated redistribution of vehicle movements across the local area. Results of the dispersion modelling study indicated air quality impacts as a result of the scheme were not significant and the scheme was granted planning permission.