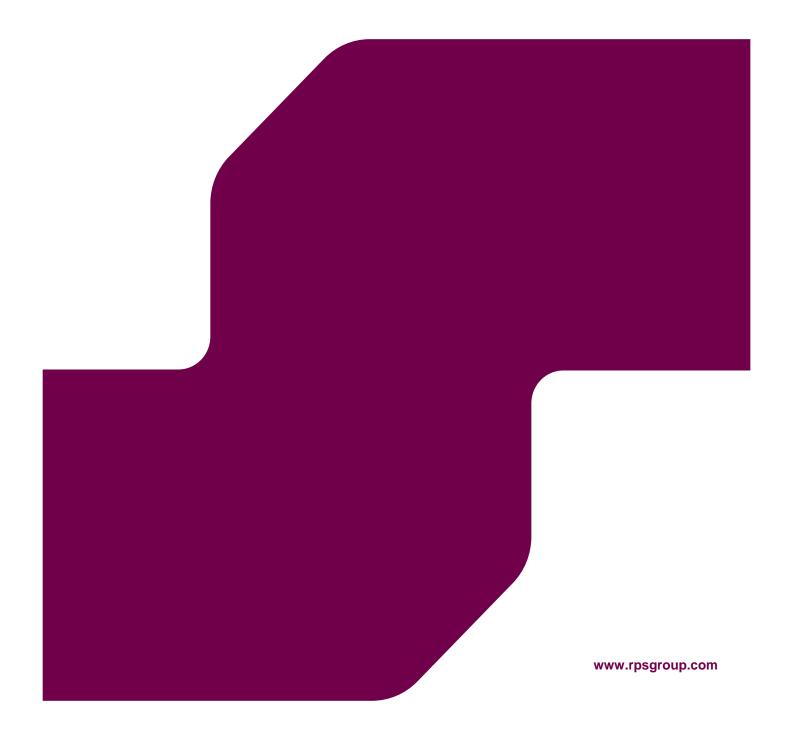


Air Quality Assessment

Parc Busnes Porth Cymru on Land at Model Farm, Rhoose

For Legal and General Homes (Strategic Land) Ltd





Quality Management						
Prepared by	Thomas Hackney MSc, BSc (Hons)	Assistant Air Quality Consultant	T. Harkney	28/06/2019		
Reviewed & checked by	Kathryn Barker MSc, BSc (Hons), AMIEnvSc	Senior Air Quality Consultant	KB	28/06/2019		
Authorised by	Fiona Prismall MSc, BSc (Hons), CEnv, FIAQM, MIEnvSc		F	28/06/2019		
Date of Issue	28/06/2019		Revision Number	Rev 0		
Job Number	JAR11064					

Revision History							
Rev	Date	Status	Reason for revision	Comments			

Calculations or mo	Calculations or models file name, link and location							
Prepared by	Thomas Hackney MSc, BSc (Hons)	Assistant Air Quality Consultant	T. Hardeney	28/06/2019				
Checked by	Kathryn Barker MSc, BSc (Hons), AMIEnvSc	Senior Air Quality Consultant	KB	28/06/2019				

DISCLAIMER

RPS has used reasonable skill and care in completing this work and preparing this report, within the terms of its brief and contract and taking account of the resources devoted to it by agreement with the client. We disclaim any responsibility to the client and others in respect of any matters outside the stated scope. This report is confidential to the client and we accept no responsibility to third parties to whom this report, or any part thereof, is made known. The opinions and interpretations presented in this report represent our reasonable technical interpretation of the data made available to us. RPS accepts no responsibility for data provided by other bodies and no legal liability arising from the use by other persons of data or opinions contained in this report.

Except for the provision of professional services on a fee basis, RPS does not have a commercial arrangement with any other person or company involved in the interests that are the subject of this report.

COPYRIGHT © RPS

The material presented in this report is confidential. This report has been prepared for the exclusive use of the client and shall not be distributed or made available to any other company or person without the knowledge and written consent of the client or RPS



Executive Summary

The Parc Busnes Porth Cymru development on Land at Model Farm, Rhoose is located within the administrative area of the Vale of Glamorgan Council (VoGC). The Vale of Glamorgan has designated an Air Quality Management Area (AQMA) due to high levels of nitrogen dioxide (NO₂) pollution from road traffic for properties on Windsor Road, Cogan in Penarth. The development is located roughly 10 km to the southwest of the Windsor Road AQMA. This indicates that air quality at the site is generally good.

This Air Quality Assessment, undertaken to accompany the planning application, considers the air quality impacts from the construction phase and once the Proposed Development is fully operational.

The assessment has been undertaken based upon appropriate information on the Proposed Development provided by Legal and General Homes and its project team. In undertaking this assessment, RPS experts have exercised professional skills and judgement to the best of their abilities and have given professional opinions that are objective, reliable and backed with scientific rigour. These professional responsibilities are in accordance with the code of professional conduct set by the Institution of Environmental Sciences for members of the Institute of Air Quality Management (IAQM).

For the construction phase, the most important consideration is dust. Without appropriate mitigation, dust could cause temporary soiling of surfaces, particularly windows, cars and laundry. The mitigation measures provided within this report should ensure that the risk of adverse dust effects is reduced to a level categorised as 'not significant'.

For the operational phase, arrivals at and departures from the Proposed Development may change the number, type and speed of vehicles using the local road network. Changes in road vehicle emissions are the most important consideration during this phase of the development.

Detailed atmospheric dispersion modelling has been undertaken for the first year in which the development is expected to be fully operational, 2023. Pollutant concentrations are predicted to be well within the relevant health-based air quality objectives at the façades of both existing and proposed receptors. Therefore, air quality is acceptable at the development site, making it suitable for its proposed uses. The operational impact of the Proposed Development on existing receptors is predicted to be 'negligible 'taking into account the changes in pollutant concentrations and absolute levels. Using the criteria adopted for this assessment together with professional judgement, the operational air quality effects are considered to be 'not significant' overall.

The Land at Model Farm, Rhoose development does not, in air quality terms, conflict with national or local policies. There are no constraints to the development in the context of air quality.



Contents

1	Introduction	1
2	Policy and Legislative Context	2
	Ambient Air Quality Legislation and National Policy	2
	National Planning Policy	4
	Local Planning Policy	6
3	Assessment Methodology	7
	Summary of Key Pollutants Considered	7
	Construction Phase - Methodology	8
	Operational Phase - Methodology	10
4	Baseline Air Quality Conditions	21
	Overview	21
	Review and Assessment Process	21
	Local Urban Background Monitoring	21
	Defra Mapped Concentration Estimates	22
	Appropriate Background Concentrations for the Development Site	22
5	Assessment of Construction-Phase Air Quality Impacts	24
	Construction Dust	24
	Risk of Dust Impacts	24
6	Assessment of Operational-Phase Air Quality Impacts	27
	Assessment of Air Quality Impacts on Surrounding Area	27
	Assessment of New Population Exposure (Site Suitability)	30
	Significance of Effects	31
	Sensitivity and Uncertainty	32
7	Mitigation	33
	Mitigation During Construction	33
	Mitigation for the Operational Impact of the Development on the Surrounding Area	35
	Mitigation for New Population Exposure (Site Suitability)	35
8	Conclusions	36



Tables, Figures and Appendices

Tables

Table 2.1 Summary of Relevant Air Quality Limit Values and Objectives	3
Table 3.1 Traffic Data Used Within the Assessment	12
Table 3.2 Examples of Where Air Quality Objectives Apply	13
Table 3.3 Modelled Sensitive Receptors	14
Table 3.4 Impact Descriptors for Individual Sensitive Receptors	16
Table 3.5 Approaches to Dealing with Uncertainty used Within the Assessment	19
Table 4.1 Passively Monitored Urban Background Annual-Mean NO_2 Concentrations	22
Table 4.2 Defra Mapped Annual-Mean Background NO ₂ Concentration Estimates	22
Table 4.3 Summary of Background Annual-Mean (Long-term) Concentrations used in Assessment	
Table 5.1 Dust Emission Magnitude for Demolition, Earthworks, Construction and Trackout	25
Table 5.2 Sensitivity of the Surrounding Area for Demolition, Earthworks and Construction	25
Table 5.3 Sensitivity of the Surrounding Area for Trackout	25
Table 5.4 Dust Impact Risk for Demolition, Earthworks, Construction and Trackout	26
Table 6.1 Predicted Annual-Mean NO ₂ Impacts at Existing Receptors	27
Table 6.2 Predicted Annual-Mean PM ₁₀ Impacts at Existing Receptors	28
Table 6.3 Predicted Annual-Mean PM _{2.5} Impacts at Existing Receptors	29
Table 6.4 Predicted Annual-Mean NO₂, PM₁₀ and PM₂.₅ Concentrations (μg.m⁻³) at Propos	



Figures

Figure 3.1 Types of Vehicle Emissions

Figure 3.2 Air Pollution: From Emissions to Exposure

Figure 1: Roads Modelled and Receptors

Figure 2: Wind Rose - Cardiff, 2018

Figure 3: Construction Dust Assessment

Appendices

Appendix A: Detailed Construction Dust Assessment Methodology

Appendix B: Model Comparison Study



1 Introduction

- 1.1 This report details the air quality assessment undertaken for the Proposed Development on Land at Model Farm, Rhoose. The mixed-unit 40-hectare development is located within the administrative area of the Vale of Glamorgan Council (VoGC). The VoGC has designated an Air Quality Management Area (AQMA) due to high levels of nitrogen dioxide (NO₂) pollution from road traffic for properties on Windsor Road, Cogan in Penarth. The development is located roughly 10 km to the south-west of the Windsor Road AQMA. This indicates that air quality at the site is generally good.
- 1.2 This air quality assessment covers the:
 - Construction phase an evaluation of the temporary effects from fugitive construction dust and construction-vehicle exhaust emissions; and the
 - Operational phase an evaluation of
 - the impacts of the development traffic on the local area
 - the impacts on future occupants of the development from their exposure to the prevailing levels of air pollution, which can be a factor in the suitability of the site for its proposed uses.
- 1.3 This report begins by setting out the policy and legislative context for the assessment. The methods and criteria used to assess potential air quality effects have then been described. The baseline air quality conditions have been established taking into account Defra estimates, local authority documents and the results of any local monitoring. The results of the assessment of air quality impacts have been presented. A conclusion has been drawn on the significance of the residual construction-phase effects and the residual operational-phase effects.



2 Policy and Legislative Context

Ambient Air Quality Legislation and National Policy

The Ambient Air Quality Directive and Air Quality Standards Regulations

The 2008 Ambient Air Quality Directive (2008/50/EC) [1] aims to protect human health and the environment by avoiding, reducing or preventing harmful concentrations of air pollutants; it sets legally binding concentration-based limit values, as well as target values. There are also information and alert thresholds for reporting purposes. These are to be achieved for the main air pollutants: particulate matter (PM₁₀ and PM_{2.5}), nitrogen dioxide (NO₂), sulphur dioxide (SO₂), ozone (O₃), carbon monoxide (CO), lead (Pb) and benzene. This Directive replaced most of the previous EU air quality legislation and in Wales was transposed into domestic law by the Air Quality Standards Regulations 2010 [2], which in addition incorporates the 4th Air Quality Daughter Directive (2004/107/EC) that sets targets for ambient air concentrations of certain toxic heavy metals (arsenic, cadmium and nickel) and polycyclic aromatic hydrocarbons (PAHs). Member states must comply with the limit values (which are legally binding on the Secretary of State) and the Government and devolved administrations operate various national ambient air quality monitoring networks to measure compliance and develop plans to meet the limit values.

UK Air Quality Strategy

- 2.2 The Environment Act 1995 established the requirement for the Government and the devolved administrations to produce a National Air Quality Strategy (AQS) for improving ambient air quality, the first being published in 1997 and having been revised several times since, with the latest published in 2007 [3]. The Strategy sets UK air quality standards* and objectives# for the pollutants in the Air Quality Standards Regulations plus 1,3-butadiene and recognises that action at national, regional and local level may be needed, depending on the scale and nature of the air quality problem. There is no legal requirement to meet objectives set within the UK AQS except where equivalent limit values are set within the EU Directives.
- 2.3 The 1995 Environment Act also established the UK system of Local Air Quality Management (LAQM), that requires local authorities to go through a process of review and assessment of air

^{*} Standards are concentrations of pollutants in the atmosphere which can broadly be taken to achieve a certain level of environmental quality. Standards, as the benchmarks for setting objectives, are set purely with regard to scientific evidence and medical evidence on the effects of the particular pollutant on health, or on the wider environment, as minimum or zero risk levels.

[#] Objectives are policy targets expressed as a concentration that should be achieved, all the time or for a percentage of time, by a certain date.



- quality in their areas, identifying places where objectives are not likely to be met, then declaring Air Quality Management Areas (AQMAs) and putting in place Air Quality Action Plans to improve air quality. These plans also contribute, at local level, to the achievement of EU limit values.
- 2.4 For the purposes of this assessment, the limit values set out in the Air Quality Standards Regulations 2010 and the objective levels specified under the current UK AQS have been used.
- 2.5 The limit values and objectives relevant to this assessment are summarised in Table 2.1. Although the EU limit values and the UK AQS objectives are numerically equal, there are some differences in where they apply and who is responsible for their achievement.

Table 2.1 Summary of Relevant Air Quality Limit Values and Objectives

Pollutant	Averaging Period	Objectives/ Limit Values	Not to be Exceeded More Than	Target Date
	1 hour	200 μg.m ⁻³ 18 times per calendar year		-
Nitrogen Dioxide (NO ₂)	Annual	40 μg.m ⁻³	-	-
Particulate Matter	24 Hour	50 μg.m ⁻³	35 times per calendar year	-
(PM ₁₀)	Annual	40 μg.m ⁻³	-	-
Particulate Matter	Annual	25 μg.m ⁻³	-	01.01.2020 (a)
(PM _{2.5})		. 3		01.01.2015 (b)

⁽a) Target date set in UK Air Quality Strategy 2007

- In July 2017, Defra published the *'UK plan for tackling roadside nitrogen dioxide concentrations'*. This describes the Government's plan for bringing roads with NO₂ concentrations above the EU Limit Value back into compliance within the shortest possible time, covering five cities, the GLA and 23 other local authorities. A Supplement to the plan was published in October 2018, which sets out measures to bring forward compliance in a further 33 local authorities that had not been covered by actions in the July 2017 plan because they had been projected to comply with the EU Limit Value by 2021.
- 2.7 On 14 January 2019, Defra published the 'Clean Air Strategy 2019'. The report sets out actions that the Government intends to take to reduce emissions from transport, in the home, from farming and from industry.

⁽b) Target date set in Air Quality Standards Regulations 2010



National Planning Policy

National Planning Policy Framework

- Current land use policies for Wales are set out in Planning Policy Wales (Edition 10, December 2018). This document is intended to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales; and to provide a strategic policy framework to assist local authorities in the preparation of their development plans. Planning Policy Wales (PPW) is supported by Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters. Planning authorities may use planning conditions or obligations to meet planning aims to protect the environment. PPW, the TANs and Circulars may be material to decisions made on individual planning applications and will be taken into account by the Secretary of State and his Inspectors in the determination of called-in planning applications and appeals.
- 2.9 Chapter 6: Distinctive & Natural Places of the PPW concerns minimising and managing environmental risks and pollution. Section 6.7 focuses on Air Quality and Soundscape and states in paragraphs 6.7.6 to 6.7.10:

"In proposing new development, planning authorities and developers must, therefore:

- address any implication arising as a result of its association with, or location within, air quality management areas, noise action planning priority areas or areas where there are sensitive receptors;
- not create areas of poor air quality or inappropriate soundscape; and
- seek to incorporate measures which reduce overall exposure to air and noise pollution and create appropriate soundscapes.

To assist decision making it will be important that the most appropriate level of information is provided and it may be necessary for a technical air quality and noise assessment to be undertaken by a suitably qualified and competent person on behalf of the developer.

Good design, for example setting back buildings from roads to avoid canyon effects and using best practice in terms of acoustic design to ensure the appropriate and intended acoustic environment of completed developments should be incorporated at an early consideration in the design and planning process. Other mitigation measures must be capable of being effectively implemented for their intended purpose, and could include those related to:

traffic management and road safety;



- ensuring progress towards a shift to low or zero emissions means of road transport, such as electrical charging points;
- supporting low or zero emissions public transport;
- providing active travel infrastructure; and
- incorporating green infrastructure, where it can improve air quality by removing air pollution
 and aiding its dispersal, reduce real or perceived noise levels by absorbing and scattering
 noise and introducing natural sounds to soften man-made noise, provide areas of relative
 tranquillity, and reduce exposure by putting a buffer between sources of pollution and
 receptors.

When proposing new strategies for development and when allocating sites in development plans it will be important to avoid instances where incremental development of infrastructure, housing, commercial and industrial development creates or exacerbate health and amenity inequalities by introducing more sensitive receptors into an area or by making existing occupiers more vulnerable to poor air quality or noise. This may particularly be the case when proposing high density developments adjacent to transport hubs or where development pressure to meet short-term needs may have detrimental long-term effects and care must be taken not to exacerbate health inequalities whilst recognising accessibility needs.

Taking a sustainable approach will mean balancing short-term needs against long-term objectives to reduce public exposure to airborne pollution and giving particular consideration to the presence of air quality management areas, noise action planning priority areas and areas with sensitive receptors when proposing new development and particularly when preparing development plans. It will be important to identify wider mitigation solutions to reduce air and noise pollution and to avoid exacerbating problems in existing air quality management areas or noise hotspots through the provision of green infrastructure identified as part of Green Infrastructure Assessments, by the provision of electric vehicle charging infrastructure or through promoting the need to consider effective design solutions. Planning authorities should work closely with bodies such as the Public Service Boards in the preparation of their well-being plans and seek input from their own Environmental Health departments".

2.10 PPW recognises that transport emissions contribute significantly to climate change and poor local air quality, which can in turn affect people's health. TAN 18 on Transport [4] elaborates further on traffic growth and its implications on the UK's ability to meet objectives for greenhouse gas emissions and for air quality. It advises that local planning authorities should therefore take into account statutory air quality objectives together with the outcomes of reviews and assessments any Air Quality Action Plans that may have been prepared.



2.11 The goal of the transport strategy One Wales: Connecting the Nation [5] is to promote sustainable transport networks that safeguard the environment while strengthening the country's economic and social life. The transport strategy identifies a series of high-level outcomes. Outcome 14 is to "Reduce the contribution of transport to air pollution and other harmful emissions". A measure of success for this outcome will be emissions of harmful pollutants attributable to the transport sector and the number of AQMAs designated due to vehicle emissions.

Local Planning Policy

2.12 The Vale of Glamorgan Local Development Plan (LDP) 2011-2026 provides the local planning policy framework for the Vale of Glamorgan and was adopted by the Council on 28th June 2017. The relevant policy for this air quality assessment is Policy MD7 – Environmental Protection:

"Development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from either:

1. Pollution of land, surface water, ground water and the air

....



3 Assessment Methodology

- 3.1 The approach is consistent with the EPUK & IAQM Land-Use Planning & Development Control: Planning For Air Quality document [6], the IAQM Guidance on the assessment of dust from demolition and construction [7] and, where relevant, Defra's Local Air Quality Management Technical Guidance: LAQM.TG16 [8]. It includes the key elements listed below:
 - assessment of the existing air quality in the study area (existing baseline) and prediction of
 the future air quality without the development in place (future baseline), using official
 government estimates from Defra, publically available air quality monitoring data for the area,
 and relevant Air Quality Review and Assessment (R&A) documents;
 - a qualitative assessment of likely construction-phase impacts with mitigation and controls in place; and
 - a quantitative prediction of the future operational-phase air quality impact with the development in place (with any necessary mitigation), encompassing
 - the impacts of the development traffic on the local area
 - the impacts on future occupants of the development from their exposure to the prevailing levels of air pollution, which can be a factor in the suitability of the site for its proposed uses.
- 3.2 The Local Authority Officer at the VoGC was consulted to agree the scope and methodology for this assessment and agreed by email on 21/06/19.
- 3.3 Air quality guidance advises that the organisation engaged in assessing the overall risks should hold relevant qualifications and/or extensive experience in undertaking air quality assessments. The RPS air quality team members involved at various stages of this assessment have professional affiliations that include Fellow and Member of the Institute of Air Quality Management, Chartered Chemist, Chartered Scientist, Chartered Environmentalist and Member of the Royal Society of Chemistry and have the required academic qualifications for these professional bodies. In addition, the Director responsible for authorising all deliverables has over 15 years' experience.

Summary of Key Pollutants Considered

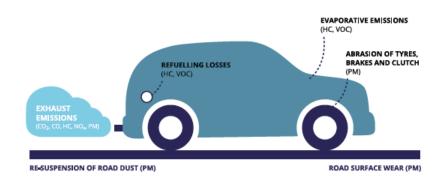
3.4 For the operational phase of the Proposed Development, the main pollutants from road traffic with potential for local air quality impacts are nitrogen oxides (NO_x) and particulate matter (PM₁₀). Emissions of total NO_x from combustion sources comprise nitric oxide (NO) and NO₂. The NO oxidises in the atmosphere to form NO₂. The assessment of operational impacts therefore



focuses on changes in NO_2 and PM_{10} concentrations. The impact from fine particulate matter, known as $PM_{2.5}$ (a subset of PM_{10}) concentrations has also been considered.

Figure 3.1 Types of Vehicle Emissions

The different types of emissions from vehicles, and a comparison of the relative amounts of selected pollutants released by the latest Euro 6 petrol and diesel vehicles



Source: European Environment Agency (2016) Explaining Road Transport Emissions: A Non-technical Guide

- 3.5 For the construction phase of the Proposed Development the key pollutant is dust, covering both the PM₁₀ fraction that is suspended in the air that can be breathed, and the deposited dust that has fallen out of the air onto surfaces and which can potentially cause temporary annoyance effects.
- 3.6 Regarding exhaust emissions from construction-related vehicles (contractors' vehicles and Heavy Goods Vehicles (HGVs), diggers, and other diesel-powered vehicles), these are unlikely to have a significant impact on local air quality [7] except for large, long-term construction sites: the EPUK & IAQM Land-Use Planning & Development Control: Planning For Air Quality document [6] indicates that air quality assessments should include developments increasing annual average daily Heavy Duty Vehicle (HDV) traffic flows by more than 25 within or adjacent to an AQMA and more than 100 elsewhere. The results of the Highways and Access assessment indicates that the aforementioned EPUK & IAQM thresholds are not expected to be exceeded for any individual road during the construction phase of this project; therefore, construction-vehicle exhaust emissions have not been assessed specifically.

Construction Phase - Methodology

3.7 Dust is the generic term used to describe particulate matter in the size range 1-75 μm in diameter [9]. Particles greater than 75 μm in diameter are termed grit rather than dust. Dusts can contain a wide range of particles of different sizes. The normal fate of suspended (i.e. airborne) dust is



deposition. The rate of deposition depends largely on the size of the particle and its density; together these influence the aerodynamic and gravitational effects that determine the distance it travels and how long it stays suspended in the air before it settles out onto a surface. In addition, some particles may agglomerate to become fewer, larger particles; whilst others react chemically.

- 3.8 The effects of dust are linked to particle size and two main categories are usually considered:
 - PM₁₀ particles, those up to 10 μm in diameter, remain suspended in the air for long periods and are small enough to be breathed in and so can potentially impact on health; and
 - Dust, generally considered to be particles larger than 10 µm which fall out of the air quite quickly and can soil surfaces (e.g. a car, window sill, laundry). Additionally, dust can potentially have adverse effects on vegetation and fauna at sensitive habitat sites.
- 3.9 The IAQM Guidance on the assessment of dust from demolition and construction sets out 350 m as the distance from the site boundary and 50 m from the site traffic route(s) up to 500 m of the entrance, within which there could potentially be nuisance dust and PM₁₀ effects on human receptors. For sensitive ecological receptors, the corresponding distances are 50 m in both cases. (In this particular application, there are no ecological receptors within the distances and ecological effects have been scoped out. These distances are set to be deliberately conservative.
- 3.10 Concentration-based limit values and objectives have been set for the PM₁₀ suspended particle fraction, but no statutory or official numerical air quality criterion for dust annoyance has been set at a UK, European or World Health Organisation (WHO) level. Construction dust assessments have tended to be risk based, focusing on the appropriate measures to be used to keep dust impacts at an acceptable level.
- 3.11 The IAQM dust guidance aims to estimate the impacts of both PM₁₀ and dust through a risk-based assessment procedure. The IAQM dust guidance document states: "The impacts depend on the mitigation measures adopted. Therefore the emphasis in this document is on classifying the risk of dust impacts from a site, which will then allow mitigation measures commensurate with that risk to be identified."
- 3.12 The IAQM dust guidance provides a methodological framework, but notes that professional judgement is required to assess effects: "This is necessary, because the diverse range of projects that are likely to be subject to dust impact assessment means that it is not possible to be prescriptive as to how to assess the impacts. Also a wide range of factors affect the amount of dust that may arise, and these are not readily quantified."
- 3.13 Consistent with the recommendations in the IAQM dust guidance, a risk-based assessment has been undertaken for the development, using the well-established source-pathway-receptor approach:



- The dust impact (the change in dust levels attributable to the development activity) at a
 particular receptor will depend on the magnitude of the dust source and the effectiveness of
 the pathway (i.e. the route through the air) from source to receptor.
- The effects of the dust are the results of these changes in dust levels on the exposed receptors, for example annoyance or adverse health effects. The effect experienced for a given exposure depends on the sensitivity of the particular receptor to dust. An assessment of the overall dust effect for the area as a whole has been made using professional judgement taking into account both the change in dust levels (as indicated by the Dust Impact Risk for individual receptors) and the absolute dust levels, together with the sensitivities of local receptors and other relevant factors for the area.

The detail of the dust assessment methodology is provided in Appendix A.

- 3.14 The dust risk categories that have been determined for each of the four activities (demolition, earthworks, construction and trackout) have been used to define the appropriate site-specific mitigation measures based on those described in the IAQM dust guidance. The guidance states that provided the mitigation measures are successfully implemented, the resultant effects of the dust exposure will normally be 'not significant'.
- 3.15 This assessment does not consider the air quality impacts of dust from any contaminated land or buildings. If contaminated land is identified on the Application Site, the impacts will be assessed in other technical discipline reports.

Operational Phase - Methodology

Atmospheric Dispersion Modelling of Pollutant Concentrations

3.16 In urban areas, pollutant concentrations are primarily determined by the balance between pollutant emissions that increase concentrations, and the ability of the atmosphere to reduce and remove pollutants by dispersion, advection, reaction and deposition. An atmospheric dispersion model is used as a practical way to simulate these complex processes; such a model requires a range of input data, which can include emissions rates, meteorological data and local topographical information. The model used and the input data relevant to this assessment are described in the following sub-sections.



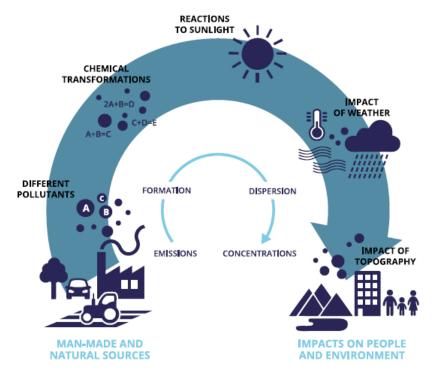


Figure 3.2 Air Pollution: From Emissions to Exposure

Source: European Environment Agency (2016) Explaining Road Transport Emissions: A Non-technical Guide

- 3.17 The atmospheric pollutant concentrations in an urban area depend not only on local sources at a street scale, but also on the background pollutant level made up of the local urban-wide background, together with regional pollution and pollution from more remote sources brought in on the incoming air mass. This background contribution needs to be added to the fraction from the modelled sources, and is usually obtained from measurements or estimates of urban background concentrations for the area in locations that are not directly affected by local emissions sources. Background pollution levels are described in detail in Section 4.
- 3.18 The ADMS-Roads model has been used in this assessment to predict the air quality impacts from changes in traffic on the local road network. This is a version of the Atmospheric Dispersion Modelling System (ADMS), a formally validated model developed in the UK by Cambridge Environmental Research Consultants Ltd (CERC) and widely used in the UK and internationally for regulatory purposes.

Modelled Scenarios

- 3.19 The following scenarios were modelled:
 - Without Development without the Proposed Development in the first year that the development is expected to be fully operational, 2023; and



• With Development – with the Proposed Development in the first year that the development is expected to be fully operational, 2023.

Model Input Data

Traffic Flow Data

3.20 Traffic data used in the assessment have been provided by the project's transport consultants, RPS Group Ltd. The traffic flow data provided for this assessment are summarised in Table 3.1. The modelled road links are illustrated in Figure 1.

Table 3.1 Traffic Data Used Within the Assessment

			Daily Two Way Vehicle Flow			
Road Link	Road Link Name	Speed (km.hr ⁻¹)	Without Development		With Development	
ID		(Total Vehicles	HDV	Total Vehicles	HDV
1	Port Road, between A4226 roundabout and Tredogan Road roundabout	80	8298	199	7899	223
2	A4226, between A4226 roundabout and B4265 roundabout	97	10295	466	10655	371
3	B4265, between B4265 roundabout and Llanwit Road	97	10295	466	10885	442
4	B4265, between Llantwit Road junction and B4270 roundabout	80	9477	380	10197	356
5	A4226, between A4226 roundabout and B4266 roundabout	80	16008	362	21495	553
6	A4226, between Stirling Road junction and Colcot Road roundabout	64	16566	477	18674	588
7	A4226, between Colcot Road roundabout and Merthyr Dyfan Road	64	25237	608	26699	584
8	A4050, between A4231 roundabout and Old Port Road roundabout	80	31405	1408	32044	1416
9	A4050, between Old Port Road roundabout and A48 roundabout	64	34864	1562	35301	1531
10	A4232, between A48 roundabout and A4232 slip road (north of B2467 roundabout)	113	60558	2164	61136	2164
11	A4226, between B4266 roundabout and A4226 junction	64	7920	120	9231	97
12	A48, Village of St Nicholas	48	15188	310	16948	382
13	A48, between 40mph speed limit sign (west of Copthorne Way junction) and A48 roundabout	64	15188	310	16895	382
14	B4265 / A4226 Roundabout	32	10295	466	10770	407
15	A4226 / Port Road Roundabout	32	25304	684	30772	845
16	A4226 / B4266 Roundabout	32	24207	539	29315	671
17	Port Road Roundabout	32	20902	542	22687	586
18	A4050 / Port Road Roundabout	32	33135	1485	33672	1473
19	Culverhouse Cross Roundabout	32	92329	3477	93680	3507



Notes: $(km.hr^1)$ = kilometres per hour; HDV = Heavy Duty Vehicle - vehicles greater than 3.5 t gross vehicle weight including buses; LDV = Light Duty Vehicle

3.21 The average speed on each road has been reduced by 10 km.hr⁻¹ to take into account the possibility of slow-moving traffic near junctions and at roundabouts in accordance with LAQM.TG16.

Vehicle Emission Factors

3.22 The modelling has been undertaken using Defra's 2019 emission factor toolkit (version 9.0) which draws on emissions generated by the European Environment Agency (EEA) COPERT 5 emission calculation tool.

Meteorological Data

3.23 ADMS-Roads requires detailed meteorological data as an input. The most representative observing station for the region of the study area that supplies all the data in the required format is Cardiff approximately 11 km north of the Application Site. Meteorological data from that station for 2018 have been used within the dispersion model. The wind rose is presented in Figure 2.

Receptors

3.24 The air quality assessment predicts the impacts at locations that could be sensitive to any changes. For assessing human-health impacts, such sensitive receptors should be selected where the public is regularly present and likely to be exposed over the averaging period of the objective. LAQM.TG16 [8] provides examples of exposure locations and these are summarised in Table 3.2.

Table 3.2 Examples of Where Air Quality Objectives Apply

Averaging Period	Objectives should apply at:	Objectives should generally not apply at:
Annual-mean	All locations where members of the public might be regularly exposed. Building façades of residential properties, schools, hospitals, care homes.	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's façades), or any other location where public exposure is expected to be short-term.
Daily-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's façade), or any other location where public exposure is expected to be short-term.
Hourly-mean	All locations where the annual and 24 hour mean would apply. Kerbside sites (e.g. 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 to which the public might reasonably be expected to spend 1-hour or longer.	

3.25 Representative sensitive receptors for this assessment have been selected at properties where pollutant concentrations and/or changes in pollutant concentrations are anticipated to be greatest, as listed in Table 3.3.

Table 3.3 Modelled Sensitive Receptors

ID	Description	Х	у
1	Proposed 1	307444	167509
2	Proposed 2	307689	167680
3	Proposed 3	308070	167935
4	Proposed 4	308255	168002
5	Proposed 5	308296	167828
6	Proposed 6	307874	167814
7	Port Road 1	307951	167928
8	Port Road 2	307836	167822
9	A4226 1	307739	168091
10	B4265 1	304906	168030
11	B4265 2	301662	167618
12	A4226 2	309088	168370
13	A4226 3	309691	168600
14	A4226 4	309629	168532
15	A4226 6	307753	172791
16	A4226 5	310236	168929
17	A4050 1	310805	169606
18	A4050 2	311803	170433
19	A4050 3	312183	173435
20	Primary School	312256	173005
21	A48 2	308969	174265
22	Brooklands Terrace 1	311894	174520
23	A4232 1	313741	175275
24	A4232 2	312199	174859
25	A48 1	310936	174865
26	B4265 2	297547	169397
27	B4265 3	297062	169545
28	A48 3	307701	174216



3.26 The annual, daily and hourly-mean AQS objectives apply at the front and rear façades of all residential properties. At the façades of the proposed commercial properties, only the hourly-mean AQS objective applies. The approaches used to predict the concentrations for these different averaging periods are described below.

Long-Term Pollutant Predictions

3.27 Annual-mean NO_x and PM₁₀ concentrations have been predicted at representative sensitive receptors using ADMS-Roads, then added to relevant background concentrations. Primary NO in the NO_x emissions is converted to NO₂ to a degree determined by the availability of atmospheric oxidants locally and the strength of sunlight. For road traffic sources, annual-mean NO₂ concentrations have been derived from the modelled road-related annual-mean NO_x concentration using Defra's calculator [10].

Short-Term Pollutant Predictions

In order to predict the likelihood of exceedances of the hourly-mean AQS objectives for NO₂ and the daily-mean AQS objective for PM₁₀, the following relationships between the short-term and the annual-mean values at each receptor have been considered.

Hourly-Mean AQS Objective for NO₂

3.29 Research undertaken in support of LAQM.TG16 has indicated that the hourly-mean limit value and objective for NO₂ is unlikely to be exceeded at a roadside location where the annual-mean NO₂ concentration is less than 60 μg.m⁻³. The threshold of 60 μg.m⁻³ NO₂ has been used the guideline for considering a likely exceedance of the hourly-mean nitrogen dioxide objective.

Daily-Mean AQS Objective for PM₁₀

- 3.30 The number of exceedances of the daily-mean AQS objective for PM₁₀ of 50 μg.m⁻³ may be estimated using the relationship set out in LAQM.TG16:
 - Number of Exceedances of Daily Mean of 50 μ g.m⁻³ = -18.5 + 0.00145 * (Predicted Annual-mean PM_{10})³ + 206 / (Predicted Annual-mean PM_{10}) Concentration)
- 3.31 This relationship indicates that the daily-mean AQS objective for PM₁₀ is likely to be met if the predicted annual-mean PM₁₀ concentration is 31.8 µg.m⁻³ or less.
- 3.32 The daily mean objective is therefore not considered further within this assessment if the annual-mean PM₁₀ concentration is predicted to be less than 31.5 µg.m⁻³.



Fugitive PM₁₀ Emissions

3.33 Transport PM₁₀ emissions arise from both the tailpipe exhausts and from fugitive sources such as brake and tyre wear and re-suspended road dust. Improvements in vehicle technologies are reducing PM₁₀ exhaust emissions; therefore, the relative importance of fugitive PM₁₀ emissions is increasing. Current official vehicle emission factors for particulate matter include brake dust and tyre wear which studies suggest may account for approximately one-third of the total particulate emissions from road transport; but not re-suspended road dust (which remains unquantified.)

Significance Criteria for Development Impacts on the Local Area

3.34 The EPUK & IAQM Land-Use Planning & Development Control: Planning For Air Quality document [6] advises that:

"The significance of the effects arising from the impacts on air quality will depend on a number of factors and will need to be considered alongside the benefits of the development in question. Development under current planning policy is required to be sustainable and the definition of this includes social and economic dimensions, as well as environmental. Development brings opportunities for reducing emissions at a wider level through the use of more efficient technologies and better designed buildings, which could well displace emissions elsewhere, even if they increase at the development site. Conversely, development can also have adverse consequences for air quality at a wider level through its effects on trip generation."

3.35 When describing the air quality impact at a sensitive receptor, the change in magnitude of the concentration should be considered in the context of the absolute concentration at the sensitive receptor. Table 3.4 provides the EPUK & IAQM approach for describing the long-term air quality impacts at sensitive human-health receptors in the surrounding area.

Table 3.4 Impact Descriptors for Individual Sensitive Receptors

Long term average concentration	% Change in concentration relative to Air Quality Assessment Level				
at receptor in assessment year	1	2-5	6-10	>10	
75 % or less of AQAL	Negligible	Negligible	Slight	Moderate	
76 -94 % of AQAL	Negligible	Slight	Moderate	Moderate	
95 - 102 % of AQAL	Slight	Moderate	Moderate	Substantial	
103 – 109 % of AQAL	Moderate	Moderate	Substantial	Substantial	



Long term average concentration	% Change in concentration relative to Air Quality Assessment Level				
at receptor in assessment year	1	2-5	6-10	>10	
110 % or more than AQAL	Moderate	Substantial	Substantial	Substantial	

- 1. AQAL = Air Quality Assessment Level, which may be an air quality objective, EU limit or target value, or an Environment Agency 'Environmental Assessment Level (EAL)'.
- 2. The table is intended to be used by rounding the change in percentage pollutant concentration to whole numbers, which then makes it clearer which cell the impact falls within. The user is encouraged to treat the numbers with recognition of their likely accuracy and not assume a false level of precision. Changes of 0%, i.e. less than 0.5% will be described as negligible.
- 3. The table is only designed to be used with annual mean concentrations.
- 4. Descriptors for individual receptors only; the overall significance is determined using professional judgement. For example, a 'moderate' adverse impact at one receptor may not mean that the overall impact has a significant effect. Other factors need to be considered.
- 5. When defining the concentration as a percentage of the AQAL, use the 'without scheme' concentration where there is a decrease in pollutant concentration and the 'with scheme;' concentration for an increase.
- 6. The total concentration categories reflect the degree of potential harm by reference to the AQAL value. At exposure less than 75% of this value, i.e. well below, the degree of harm is likely to be small. As the exposure approaches and exceeds the AQAL, the degree of harm increases. This change naturally becomes more important when the result is an exposure that is approximately equal to, or greater than the AQAL.
- 7. It is unwise to ascribe too much accuracy to incremental changes or background concentrations, and this is especially important when total concentrations are close to the AQAL. For a given year in the future, it is impossible to define the new total concentration without recognising the inherent uncertainty, which is why there is a category that has a range around the AQAL, rather than being exactly equal to it.
- 3.36 The human-health impact descriptors above apply at individual receptors. The EPUK & IAQM guidance states that the impact descriptors "are not, of themselves, a clear and unambiguous guide to reaching a conclusion on significance. These impact descriptors are intended for application at a series of individual receptors. Whilst it maybe that there are 'slight', 'moderate' or 'substantial' impacts at one or more receptors, the overall effect may not necessarily be judged as being significant in some circumstances."
- 3.37 Professional judgement by a competent, suitably qualified professional is required to establish the significance associated with the consequence of the impacts. This judgement is likely to take into account the extent of the current and future population exposure to the impacts and the influence and/or validity of any assumptions adopted during the assessment process.

Significance Criteria for New Population Exposure (Site Suitability)

3.38 The EPUK & IAQM guidance considers an exceedance of an air quality objective at a building façade to be significant adverse effect unless provision is made to reduce the resident's or occupant's exposure by some means.

Uncertainty

3.39 All air quality assessment tools, whether models or monitoring measurements, have a degree of uncertainty associated with the results. The choices that the practitioner makes in setting-up the model, choosing the input data, and selecting the baseline monitoring data will decide whether



- the final predicted impact should be considered a central estimate, or an estimate tending towards the upper bounds of the uncertainty range (i.e. tending towards worst-case).
- 3.40 The atmospheric dispersion model itself contributes some of this uncertainty, due to it being a simplified version of the real situation: it uses a sophisticated set of mathematical equations to approximate the complex physical and chemical atmospheric processes taking place as a pollutant is released and as it travels to a receptor. The predictive ability of even the best model is limited by how well the turbulent nature of the atmosphere can be represented.
- 3.41 Each of the data inputs for the model, listed earlier, will also have some uncertainty associated with them. Where it has been necessary to make assumptions, these have mainly been made towards the upper end of the uncertainty range informed by an analysis of relevant, available data.
- 3.42 The atmospheric dispersion model used for this assessment, ADMS Roads, has been validated by its supplier and is widely used by professionals in the UK and overseas. A site-specific verification (calibration) provides additional certainty and is particularly important when air quality levels are close to exceeding the objectives/limit values.
- 3.43 LAQM.TG16 requires that local authorities verify the results of any detailed modelling undertaken for the purposes of fulfilling their R&A duties. Model verification refers to the checks that are carried out on model performance at a local level. Modelled concentrations are compared with the results of monitoring. Where there is a disparity between modelled and monitored concentrations, the first step is to review the appropriateness of the data inputs to determine whether the performance of the model can be improved. Once reasonable efforts have been made to reduce the uncertainties in the data inputs, an adjustment may be established and applied to reduce any remaining disparity between modelled and monitored concentrations. No adjustment factor is deemed necessary where the modelled concentrations are within 25% of the monitored concentrations.
- 3.44 For the verification and adjustment of NOx/NO2 concentrations for R&A purposes, it is recommended that the comparison involves a combination of automatic and diffusion monitoring, rather than a single automatic monitor. This is to ensure any adjustment factor derived is representative of all locations modelled and not unduly weighted towards the characteristics at a single site. Where only diffusion tubes are used for the model verification, the study should consider a broad spread of monitoring locations across the study area to provide sufficient information relating to the spatial variation in pollutant concentrations.
- 3.45 Local Authorities generally implement a broad spread of monitoring, particularly in areas that are known to be sensitive to changes in air quality. Consequently, Local Authorities are usually able



- to verify the models they use for R&A purposes; however for individual developments, there is less likely to be a broad range of monitoring locations within the relevant study area.
- 3.46 In this case, a broad spread of monitoring data is not currently available to allow the model to be verified. The roadside monitors nearest to the study area are located in urban areas and so are not considered representative of the study area which is in a more rural location. Instead, a model comparison study was undertaken using the passive monitoring station at 2 Horseshoes (38). The model comparison study is outlined in Appendix B and shows that the model is slightly over predicting.
- 3.47 The main components of uncertainty in the total predicted concentrations, made up of the background concentration and the modelled fraction, include those summarised in Table 3.5.

Table 3.5 Approaches to Dealing with Uncertainty used Within the Assessment

Concentration	Source of Uncertainty	Approach to Dealing with Uncertainty	Comments
	Characterisation of current baseline air quality conditions	The background concentration used within the assessment is the most conservative value from a comparison of measured and Defra mapped concentration estimate.	The background concentration is the major proportion of the total predicted concentration.
Background Concentration	Characterisation of future baseline air quality (i.e. the air quality conditions in the future assuming that the development does not proceed)	The future background concentration used in the assessment is the same as the current background concentration and no reduction has been assumed. This is a conservative assumption as, in reality, background concentrations are likely to reduce over time as cleaner vehicle technologies form an increasing proportion of the fleet.	The conservative assumptions adopted ensure that the background concentration used within the model contributes to the result being towards the top of the uncertainty range, rather than a central estimate.
	Traffic flow estimates	Traffic flows provided have all been based on traffic counts, rather than flows derived from a traffic model. High growth assumptions have been used to develop the traffic dataset used within the model.	The modelled fraction is a minor proportion of the total predicted concentration.
Fraction from Modelled Sources	Traffic speed estimates	Measured average traffic speeds have been used within the model. The average speed has been reduced in congested areas to take account of slow-moving and queuing traffic.	The modelled fraction is likely to contribute to the result being between a central estimate and the top of the uncertainty
	Road-related emission factors – projection to future years	The most recently published emission factors have been used within the modelling and these are based on the current and best	range.



Concentration	Source of Uncertainty	Approach to Dealing with Uncertainty	Comments
		understanding of the variation in emission factors in future years.	
	Meteorological Data	Uncertainties arise from any differences between the conditions at the met station and the development site, and between the historical met years and the future years. These have been minimised by using meteorological data collated at a representative measuring site. The model has been run for a full year of meteorological conditions. This means that the conditions in 8,760 hours have been considered in the assessment.	
	Receptors	Receptor locations have been identified where concentrations are highest or where the greatest changes are expected.	
	Dispersion Modelling	It has not been possible to formally verify the model; however, measured and modelled concentrations have been compared in Appendix B.	

3.48 The analysis of the component uncertainties indicates that, overall, the predicted total concentration is likely to be towards the top of the uncertainty range rather than being a central estimate. The actual concentrations that will be found when the development is operational are unlikely to be higher than those presented within this report and are more likely to be lower.



4 Baseline Air Quality Conditions

Overview

- 4.1 The background concentration often represents a large proportion of the total pollution concentration, so it is important that the background concentration selected for the assessment is realistic. National Planning Practice Guidance and EPUK & IAQM guidance highlight public information from Defra and local monitoring studies as potential sources of information on background air quality. LAQM.TG16 recommends that Defra mapped concentration estimates are used to inform background concentrations in air quality modelling and states that: "Where appropriate these data can be supplemented by and compared with local measurements of background, although care should be exercised to ensure that the monitoring site is representative of background air quality".
- 4.2 For this assessment, the background air quality has been characterised by drawing on information from the following public sources:
 - Defra maps [11], which show estimated pollutant concentrations across the UK in 1 km grid squares; and
 - published results of local authority Review and Assessment (R&A) studies of air quality, including local monitoring and modelling studies.
- 4.3 A detailed description of how the baseline air quality has been derived for this Proposed Development site is summarised in the following paragraphs.

Review and Assessment Process

4.4 The nearest Air Quality Management Area to the Application Site, Penarth, Windsor Road AQMA, is located approximately 10 km southwest and is designated due to high levels of NO₂ pollution from road traffic. The Vale of Glamorgan is proposing to revoke this AQMA.

Local Urban Background Monitoring

- 4.5 Monitors at urban background locations measure concentrations away from the local influence of emission sources and are therefore broadly representative of residential areas within large conurbations. Monitoring at local urban background locations is considered an appropriate source of data for the purposes of describing baseline air quality for this Proposed Development site.
- 4.6 There are no local monitoring stations where urban background concentrations are measured using continuous automatic instruments. However, the VoGC manually monitors NO₂



concentrations at a number of urban background locations using passive diffusion tubes and the most recently measured annual-mean concentrations are presented in Table 4.1.

Table 4.1 Passively Monitored Urban Background Annual-Mean NO₂ Concentrations

Manitan		Approximate			Concentration (µg.m ⁻³)			
Monitor Code	Monitor Name	Distance from the Application Site (km)	X	У	2015	2016	2017	2018
97	7 Picketson Close	7.6	300460	169310	-	-	8.4	7.8
47	Dinas Powys Health Centre	8.2	315710	171385	14.4	13.5	11.6	-
41	Dispenser Road	6.9	315278	168451	13.1	14.5	11.5	10.9

All concentrations have been adjusted for bias

Defra Mapped Concentration Estimates

4.7 Defra's total annual-mean NO₂ concentration estimates have been collected for the 1 km grid squares of the monitoring sites and the Proposed Development and are summarised in Table 4.2.

Table 4.2 Defra Mapped Annual-Mean Background NO₂ Concentration Estimates

		Approximate Distance	Concentration (µg.m ⁻³)		
Monitor Code	Monitor Name	from the Application Site (km)	Range of Monitored	Estimated Defra Mapped	
97	7 Picketson Close	7.6	7.8 - 8.4	5.3	
47	Dinas Powys Health Centre	8.8	11.6 – 14.4	10.2	
41	Dispenser Road	7.5	10.9 – 14.5	9.5	
-	Application Site	-	-	7.9	

Appropriate Background Concentrations for the Development Site

- 4.8 For NO₂, the Defra mapped background concentration estimates are smaller than the range of the results from monitoring. Therefore, to ensure a conservative approach, the background annual-mean NO₂ concentration has been derived from highest measured concentration of 14.5 μg.m⁻³, monitored at Dispenser Road in 2016.
- 4.9 In the absence of PM_{10} monitoring in the vicinity of the site, the background annual-mean PM_{10} concentration has been derived from the estimated Defra mapped concentration at the Application Site of 10.3 μ g.m⁻³.



- 4.10 In the absence of $PM_{2.5}$ monitoring at this site, the background annual-mean concentration at the Application Site has been derived from the Defra mapped background concentration estimate at the Application Site of 6.7 μ g.m⁻³.
- 4.11 Historically the view has been that background traffic-related NO₂ concentrations in the UK would reduce over time, due to the progressive introduction of improved vehicle technologies and increasingly stringent limits on emissions. However, the results of recent monitoring across the UK suggest that background annual-mean NO₂ concentrations have not decreased in line with expectations. Inspection of the results of local monitoring presented here indicates that there is no particular trend over time for concentrations of NO₂ in the vicinity of the Application Site.
- 4.12 To ensure that the assessment presents conservative results, no reduction in the background has been applied for future years.
- 4.13 Table 4.3 summarises the annual-mean background concentrations for NO₂, PM₁₀ and PM_{2.5} used in this assessment.

Table 4.3 Summary of Background Annual-Mean (Long-term) Concentrations used in the Assessment

Pollutant	Data Source	Concentration (μg.m ⁻³)
NO ₂	Dispenser Road (2016)	14.5
PM ₁₀	Defre (2017)	10.3
PM _{2.5}	Defra (2017)	6.7



5 Assessment of Construction-Phase Air Quality Impacts

Construction Dust

- Whilst no detailed construction phase information is currently available, the type of activities that could cause fugitive dust emissions are: demolition; earthworks; handling and disposal of spoil; wind-blown particulate material from stockpiles; handling of loose construction materials; and movement of vehicles, both on and off site.
- 5.2 The level and distribution of construction dust emissions will vary according to factors such as the type of dust, duration and location of dust-generating activity, weather conditions and the effectiveness of suppression methods.
- 5.3 The main effect of any dust emissions, if not mitigated, could be annoyance due to soiling of surfaces, particularly windows, cars and laundry. However, it is normally possible, by implementation of proper control, to ensure that dust deposition does not give rise to significant adverse effects, although short-term events may occur (for example, due to technical failure or exceptional weather conditions). The following assessment, using the IAQM methodology, predicts the risk of dust impacts and the level of mitigation that is required to control the residual effects to a level that is "not significant".

Risk of Dust Impacts

Source

- 5.4 The volume of the buildings on site that would be demolished has been estimated to be below 20,000 m³, the dust emission magnitude for the demolition phase is classified, using the IAQM dust guidance, as small.
- 5.5 The site area is greater than 10,000 m², the dust emission magnitude for the earthworks phase is classified as large.
- 5.6 The total volume of the buildings to be constructed would be between greater than 100,000 m³, the dust emission magnitude for the construction phase is classified as large.
- 5.7 Assuming that the maximum number of outwards movements in any one day is between 10 and 50 HDVs, the dust emission magnitude for trackout would be classified as medium.



Table 5.1 Dust Emission Magnitude for Demolition, Earthworks, Construction and Trackout

Demolition Earthworks		Construction	Trackout
Small	Large	Large	Medium

Pathway and Receptor - Sensitivity of the Area

5.8 All demolition, earthworks and construction activities are assumed to occur within the site boundary. As such, receptors at distances within 20 m, 50 m, 100 m, 200 m and 350 m of the site boundary have been identified and are illustrated in Figure 3. The sensitivity of the area has been classified and the results are provided in Table 5.2 below.

Table 5.2 Sensitivity of the Surrounding Area for Demolition, Earthworks and Construction

Potential Impact	Sensitivity of the Surrounding Area	Reason for Sensitivity Classification
Dust Soiling	Medium	1 hotel along Port Road to the west of the site. >1 high sensitivity receptor located within 20 m of the site boundary (Table A.5)
Human Health	Low	1 hotel along Port Road to the west of the site. Background PM_{10} concentrations for the assessment = $10.3~\mu g.m^{-3}$ $1-10$ high sensitivity receptors located within 20 m of the site boundary and PM_{10} concentrations below 24 $\mu g.m^{-3}$ (Table A.6)

5.9 The Dust Emission Magnitude for trackout is classified as medium and trackout may occur on roads up to 200 m from the site. The major routes within 200 m of the site are Port Road and the A4226. The sensitivity of the area has been classified and the results are provided in Table 5.3.

Table 5.3 Sensitivity of the Surrounding Area for Trackout

Potential Impact	Sensitivity of the Surrounding Area	Reason for Sensitivity Classification
Dust Soiling	Medium	Approx. 3 hotels along Port Road to the west of the site.



		1 – 10 high sensitivity receptors located within 20 m of the roads (Table A.5)
		Approx. 3 hotels along Port Road to the west of the site.
Human Health	Low	Background PM $_{10}$ concentrations for the assessment = $10.3 \ \mu g.m^{-3}$
		1 – 10 high sensitivity receptors located within 50 m of the roads and PM_{10} concentrations below 24 $\mu g.m^{-3}$ (Table A.6)

Overall Dust Risk

5.10 The Dust Emission Magnitude has been considered in the context of the Sensitivity of the Area (Tables A.5 and A.6) to give the Dust Impact Risk. Table 5.4 summarises the Dust Impact Risk for the four activities.

Table 5.4 Dust Impact Risk for Demolition, Earthworks, Construction and Trackout

Source	Demolition	Earthworks	Construction	Trackout
Dust Soiling	Low	Medium	Medium	Low
Human Health	Negligible	Low	Low	Low
Risk	Low	Medium	Medium	Low

- 5.11 Taking the site as a whole, the overall risk is deemed to be medium. The mitigation measures appropriate to a level of risk for the site as a whole and for each of the phases are set out in Section 7.
- 5.12 Provided this package of mitigation measures is implemented, the residual construction dust effects will not be significant. The IAQM dust guidance states that "For almost all construction activity, the aim should be to prevent significant effects on receptors through the use of effective mitigation. Experience shows that this is normally possible. Hence the residual effect will normally be 'not significant'." The IAQM dust guidance recommends that significance is only assigned to the effect after the activities are considered with mitigation in place.



6 Assessment of Operational-Phase Air Quality Impacts

Assessment of Air Quality Impacts on Surrounding Area

This section of the report summarises the future operational-phase air quality impacts of the key pollutants associated with the development traffic of the proposed scheme.

Nitrogen Dioxide (NO₂)

6.2 Table 6.1 presents the annual-mean NO₂ concentrations predicted at the façades of existing receptors.

Table 6.1 Predicted Annual-Mean NO₂ Impacts at Existing Receptors

	Concentration (µg.m ⁻³)		With - Without		
Receptor ID	Without Development	With Development	Dev as % of the AQS Objective	Impact Descriptor	
Port Road 1	15.5	15.6	0	Negligible	
Port Road 2	15.3	15.3	0	Negligible	
A4226 1	14.9	14.9	0	Negligible	
B4265 1	14.8	14.8	0	Negligible	
B4265 2	15.8	15.9	0	Negligible	
A4226 2	16.1	16.7	1	Negligible	
A4226 3	17.2	17.7	1	Negligible	
A4226 4	17.5	18.2	2	Negligible	
A4226 6	14.9	15.0	0	Negligible	
A4226 5	17.1	17.4	1	Negligible	
A4050 1	17.7	18.0	1	Negligible	
A4050 2	17.0	17.1	0	Negligible	
A4050 3	16.7	16.8	0	Negligible	
Primary School	15.7	15.8	0	Negligible	
A48 2	17.0	19.7	7	Slight	
Brooklands Terrace 1	18.5	18.8	1	Negligible	
A4232 1	20.3	20.5	0	Negligible	
A4232 2	19.3	19.9	1	Negligible	
A48 1	15.3	15.7	1	Negligible	
B4265 2	15.5	15.6	0	Negligible	
B4265 3	15.5	15.6	0	Negligible	
A48 3	15.8	17.1	3	Negligible	
Maximum	20.3	20.5	7	-	
Minimum	14.8	14.8	0	-	



- 6.3 Predicted annual-mean NO₂ concentrations in the opening year at the façades of the existing receptors are below the AQS objective for NO₂. When the magnitude of change is considered in the context of the absolute concentrations, the impact descriptor ranges from 'slight adverse' to 'negligible'.
- 6.4 As all predicted annual-mean NO₂ concentrations are below 60 μg.m⁻³, the hourly-mean objective for NO₂ is likely to be met at all receptors. The short-term NO₂ impact can be considered 'negligible' and is not considered further within this assessment.
- Overall, the impact on the surrounding area from NO₂ is considered to be 'negligible', using the criteria adopted for this assessment and based on professional judgement.

Particulate Matter (PM₁₀)

Table 6.2 presents the annual-mean PM_{10} concentrations predicted at the façades of existing receptors.

Table 6.2 Predicted Annual-Mean PM₁₀ Impacts at Existing Receptors

Receptor ID	Concentration (µg.m ⁻³)		With - Without Dev as % of	Impact Descriptor
	Without Development	With Development	the AQS Objective	, , ,
Port Road 1	10.5	10.5	0	Negligible
Port Road 2	10.5	10.5	0	Negligible
A4226 1	10.3	10.4	0	Negligible
B4265 1	10.4	10.4	0	Negligible
B4265 2	10.6	10.6	0	Negligible
A4226 2	10.5	10.6	0	Negligible
A4226 3	10.6	10.7	0	Negligible
A4226 4	10.6	10.7	0	Negligible
A4226 6	10.4	10.4	0	Negligible
A4226 5	10.6	10.7	0	Negligible
A4050 1	10.7	10.7	0	Negligible
A4050 2	10.6	10.6	0	Negligible
A4050 3	10.6	10.6	0	Negligible
Primary School	10.5	10.5	0	Negligible
A48 2	10.6	10.9	1	Negligible
Brooklands Terrace 1	10.8	10.8	0	Negligible
A4232 1	10.8	10.9	0	Negligible
A4232 2	10.8	10.8	0	Negligible
A48 1	10.4	10.4	0	Negligible
B4265 2	10.6	10.6	0	Negligible
B4265 3	10.6	10.6	0	Negligible
A48 3	10.4	10.6	0	Negligible
Maximum	10.8	10.9	1	-



Receptor ID	Concentration (µg.m ⁻³)		With - Without Dev as % of	
	Without Development	With Development	the AQS Objective	Impact Descriptor
Minimum	10.3	10.4	0	-

- 6.7 Predicted annual-mean PM₁₀ concentrations in the opening year at the façades of the existing receptors are well below the AQS objective for PM₁₀. When the magnitude of change is considered in the context of the absolute concentrations, the impact descriptor is categorised as 'negligible' at all receptors.
- As all predicted annual mean PM_{10} concentrations are below 31.5 μ g.m⁻³, the daily-mean PM_{10} objective is expected to be met at all receptors and the short-term PM_{10} impact is not considered further within this assessment.
- 6.9 Overall, the impact on the surrounding area from PM₁₀ is considered to be 'negligible', using the criteria adopted for this assessment and based on professional judgement.

Fine Particulate Matter (PM_{2.5})

6.10 Table 6.3 presents the annual-mean $PM_{2.5}$ concentrations predicted at the façades of existing receptors.

Table 6.3 Predicted Annual-Mean PM_{2.5} Impacts at Existing Receptors

Receptor ID	Concentration (µg.m ⁻³)		With - Without Dev as % of	Impact Descriptor
	Without Development	With Development	the AQS Objective	impact Descriptor
Port Road 1	6.8	6.8	0	Negligible
Port Road 2	6.8	6.8	0	Negligible
A4226 1	6.7	6.7	0	Negligible
B4265 1	6.7	6.7	0	Negligible
B4265 2	6.9	6.9	0	Negligible
A4226 2	6.8	6.9	0	Negligible
A4226 3	6.9	6.9	0	Negligible
A4226 4	6.9	7.0	0	Negligible
A4226 6	6.7	6.7	0	Negligible
A4226 5	6.9	6.9	0	Negligible
A4050 1	6.9	7.0	0	Negligible
A4050 2	6.9	6.9	0	Negligible
A4050 3	6.9	6.9	0	Negligible
Primary School	6.8	6.8	0	Negligible
A48 2	6.9	7.1	1	Negligible



Receptor ID	Concentration (µg.m ⁻³)		With - Without Dev as % of	
	Without Development	With Development	the AQS Objective	Impact Descriptor
Brooklands Terrace 1	7.0	7.0	0	Negligible
A4232 1	7.1	7.1	0	Negligible
A4232 2	7.0	7.0	0	Negligible
A48 1	6.8	6.8	0	Negligible
B4265 2	6.8	6.9	0	Negligible
B4265 3	6.9	6.9	0	Negligible
A48 3	6.8	6.9	0	Negligible
Maximum	7.1	7.1	1	-
Minimum	6.7	6.7	0	-

AQS objective = 25 µg.m⁻³

- 6.11 Predicted annual-mean PM_{2.5} concentrations in the opening year at the façades of the existing receptors are below the AQS objective for PM_{2.5} at all receptors. When the magnitude of change is considered in the context of the absolute concentrations, the impact descriptor is categorised as 'negligible' at all receptors.
- 6.12 Overall, the impact on the surrounding area from PM_{2.5} is considered to be 'negligible', using the criteria adopted for this assessment and based on professional judgement.

Assessment of New Population Exposure (Site Suitability)

- 6.13 This section of the report summarises the operational-phase air quality impacts on future occupants of the development from their exposure to the prevailing levels of air pollution, which can be a factor in the suitability of the site for its proposed uses.
- 6.14 Table 6.4 presents the annual-mean NO₂, PM₁₀ and PM_{2.5} concentrations predicted at the façades of proposed receptors.

Table 6.4 Predicted Annual-Mean NO₂, PM₁₀ and PM_{2.5} Concentrations (μg.m⁻³) at Proposed Receptors

Receptor Name	NO ₂	PM ₁₀	PM _{2.5}
Proposed 1	14.8	10.4	6.7
Proposed 2	15.8	10.6	6.9
Proposed 3	17.1	10.6	6.9
Proposed 4	18.4	10.8	7.0
Proposed 5	14.9	10.4	6.7
Proposed 6	16.3	10.7	6.9
Minimum	18.4	10.8	7.0
Maximum	14.8	10.4	6.7



- The long-term and short-term objectives apply at the Proposed Development.
- The predicted annual-mean NO_2 concentrations range between 14.8 and 18.4 μ g.m⁻³, well below the annual-mean AQS objective of 40 μ g.m⁻³ at all receptors. Furthermore, as the annual-mean NO_2 concentration is predicted to be less than 60 μ g.m⁻³, the hourly-mean AQS objective is expected to be met.
- 6.17 The predicted annual-mean PM₁₀ concentrations range between 10.4 and 10.8 μg.m⁻³, well below the annual-mean AQS objective of 40 μg.m⁻³ at all receptors. Furthermore, as the annual-mean PM₁₀ concentration is predicted to be less than 31.5 μg.m⁻³, the daily-mean AQS objective for this pollutant is expected to be met.
- 6.18 Predicted annual-mean PM_{2.5} concentrations range between 6.7 and 7.0 μg.m⁻³. Predicted concentrations at all receptors are below the annual-mean AQS objective of 25 μg.m⁻³.

Significance of Effects

- 6.19 It is generally considered good practice that, where possible, an assessment should communicate effects both numerically and descriptively. Professional judgement by a competent, suitably qualified professional is required to establish the significance associated with the consequence of the impacts.
- The impacts predicted at individual receptors and the geographical extent over which such impacts occur, can be used to inform the judgement on the impact on the surrounding area as a whole, and whether the resulting overall effect is significant or not. The IAQM guidance states, "Whilst it may be that there are 'slight', 'moderate', or 'substantial' impacts at one or more receptors, the overall effect may not necessarily be judged as being significant in some circumstances." and "...a 'moderate' or 'substantial' impact may not have a significant effect if it is confined to a very small area and where it is not obviously the cause of harm to human health."
- The results of the modelling indicate that with the development, the predicted NO₂, PM₁₀ and PM_{2.5} concentrations at existing receptors are below the relevant long and short-term AQS objectives. When the magnitude of change in annual-mean NO₂, PM₁₀ and PM_{2.5} concentrations is considered in the context of the absolute predictions, the air quality impacts of the development on existing receptors are categorised as 'negligible' apart from at one receptor here the impact descriptor is 'slight adverse' for NO₂. Taking into account the geographical extent of the impacts predicted in this study, the overall impact of the development on the surrounding area as a whole is considered to be 'negligible', using the descriptors adopted for this assessment.



- 6.22 The AQS objectives for NO₂, PM₁₀ and PM_{2.5} are likely to be met at the facades of the Proposed Development. On that basis, future occupants of the development should be exposed to acceptable air quality and the site is deemed suitable for its proposed future in this respect.
- 6.23 Using professional judgement, the resulting air quality effect is considered to be 'not significant' overall.

Sensitivity and Uncertainty

- 6.24 Section 3 provided an analysis of the sources of uncertainty in the results of the assessment. The conclusion of that analysis was that, overall, the predicted total concentration is likely to be towards the top of the uncertainty range rather than being a central estimate. The actual concentrations that will be found when the development is operational are unlikely to be higher than those presented within this report and are more likely to be lower.
- 6.25 The impacts at existing receptors are shown to be not significant even for this conservative scenario. Similarly, the predicted pollutant concentrations at proposed receptors are below the relevant AQS objectives. Consequently, further sensitivity analysis has not been undertaken and, in practice, the impacts at sensitive receptors are likely to be lower than those reported in this conservative assessment.



7 Mitigation

Mitigation During Construction

- 7.1 The IAQM dust guidance lists mitigation measures for low, medium and high dust risks.
- As summarised in Table 5.4, the predicted Dust Impact Risk is classified as low for Demolition and Trackout and medium for Earthworks and Construction. The general site measures described as 'highly recommended' for medium risks are listed below. The 'highly recommended' measures for low risk demolition sites and medium risk construction sites are also listed. There are no 'highly recommended' measures for medium risk earthworks or low risk trackout.

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.

Dust Management Plan

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 PM10
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 to monitor compliance with the DMP, 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 PM₁₀ continuous monitoring locations with the Local Authority.
 Commence baseline monitoring at least three months before work commences on site or, if it a large site, before work on a phase commences. A shorter monitoring period or concurrent upwind and downwind monitoring may be agreed by the local authority. Further guidance is provided by IAQM on monitoring during demolition, earthworks and construction [12].

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 active for an extended 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.
- Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.

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/particulate 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 and burning of waste materials.

Low risk measures specific to demolition

- Ensure effective water suppression is used during demolition operations. Hand held sprays are more effective
 than hoses attached to equipment as the water can be directed to where it is needed. In addition high volume
 water suppression systems, manually controlled, can produce fine water droplets that effectively bring the dust
 particles to the ground.
- Avoid explosive blasting, using appropriate manual or mechanical alternatives.
- Bag and remove any biological debris or damp down such material before demolition.

Medium risk 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.
- 7.3 The IAQM document also provides measures described as 'desirable' and these may be required by the local planning authority:

Monitoring

Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100 m of the site boundary with cleaning to be provided if necessary.

Operating vehicle/machinery and sustainable travel

- Impose and signpost a maximum-speed-limit of 15 mph on surfaced and 10 mph on un-surfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).
- Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).



Demolition

Soft-strip inside buildings before demolition (retaining walls and windows in the rest of the building where
possible, to provide a screen against dust).

Earthworks

- Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.
- Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as
 practicable.
- Only remove the cover in small areas during work and not all at once.

Construction

- Avoid scabbling (roughening of concrete surfaces) if possible.
- Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.
- For smaller supplies of fine powder materials ensure bags are sealed after use and stored appropriately to prevent dust.

Trackout

- Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.
- Avoid dry sweeping of large areas.
- · Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
- Record all inspections of haul routes and any subsequent action in a site log book.
- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).
- 7.4 The IAQM dust guidance states that with the recommended dust mitigation measures in place the residual effect will normally be "not significant", and recommends the mitigation is secured by for example planning conditions, a legal obligation, or by legislation.

Mitigation for the Operational Impact of the Development on the Surrounding Area

7.5 When the change in concentration at existing sensitive receptors is considered in the context of the absolute concentration, the overall air quality impact on the surrounding area as a whole is categorised as "negligible" and the resulting effect is considered to be "not significant". On that basis, no mitigation measures are considered necessary.

Mitigation for New Population Exposure (Site Suitability)

7.6 The predicted pollutant concentrations at proposed sensitive receptors are below the relevant AQS objectives. As such, the air quality effect of exposure on future occupants is considered to be "not significant". On that basis, no mitigation measures are considered necessary.



8 Conclusions

- 8.1 This assessment has considered dust effects during the construction phase and the air quality impacts during the operational phase of the proposed mixed-use development on Land at Model Farm development.
- 8.2 Impacts during construction, such as dust generation and plant vehicle emissions, are predicted to be of short duration and only relevant during the construction phase. The results of the risk assessment of construction dust impacts undertaken using the IAQM dust guidance, indicates that before the implementation of mitigation and controls, the risk of dust impacts will be medium. Implementation of the highly-recommended mitigation measures described in the IAQM construction dust guidance should reduce the residual dust effects to a level categorised as "not significant".
- Regarding the operational impact of the Land at mode Farm development on the surrounding area, detailed atmospheric dispersion modelling has been undertaken for the first year in which the development is expected to be fully operational, 2023. The operational impact of the Land at Model Farm development on existing receptors in the local area is predicted to be 'negligible' taking into account the changes in pollutant concentrations and absolute levels. Using the criteria adopted for this assessment together with professional judgement, the overall impact on the area as a whole is described as 'negligible'.
- 8.4 Regarding suitability of air quality at the site for introducing new occupants, pollutant concentrations at the façades of proposed residential receptors are predicted to be well within the relevant health-based air quality objectives. On that basis, future occupants of the Land at Model Farm development should be exposed to acceptable air quality and the site is deemed suitable for its proposed future use in this respect.
- 8.5 Using professional judgement, the resulting air quality effect of the Land at Model Farm development is considered to be 'not significant' overall.
- At the heart of the NPPF is a presumption in favour of sustainable development, subject to caveats where a plan or project affects a habitats site. For determining planning applications, this means approving development proposals if they accord with the local development plan, unless material considerations indicate otherwise. If the development plan is absent, silent or the policies are out of date, then planning permission should be granted unless any adverse impacts would significantly outweigh the benefits, or specific policies in the NPPF indicate development should be restricted.
- 8.7 The NPPG advises that in considering planning permission, the relevant question for air quality is "will the proposed development (including mitigation) lead to an unacceptable risk from air





pollution, prevent sustained compliance with EU limit values or national objectives for pollutants or fail to comply with the requirements of the Habitats Regulations?" The proposed development will not.

8.8 The Land at Model Farm development does not, in air quality terms, conflict with national or local policies. There are no constraints to the development in the context of air quality.



Glossary

Dust

AADT Annual Average Daily Traffic Flow

ADMS Atmospheric Dispersion Modelling System

AQMA Air Quality Management Area

AQS Air Quality Strategy

Deposited Dust Dust that has settled out onto a surface after having been suspended in air

DMP Dust Management Plan

Solid particles suspended in air or settled out onto a surface after having

been suspended in air

Effect The consequences of an impact, experienced by a receptor

EPUK Environmental Protection UK

HDV Heavy Duty Vehicle

HGV Heavy Goods Vehicle

IAQM Institute of Air Quality Management

The change in atmospheric pollutant concentration and/or dust deposition.

Impact A scheme can have an 'impact' on atmospheric pollutant concentration but

no effect, for instance if there are no receptors to experience the impact

NPPF National Planning Policy Framework

NPPG National Planning Practice Guidance

R&A Review and Assessment

A person, their land or property and ecologically sensitive sites that may be Receptor

affected by air quality

Risk The likelihood of an adverse event occurring

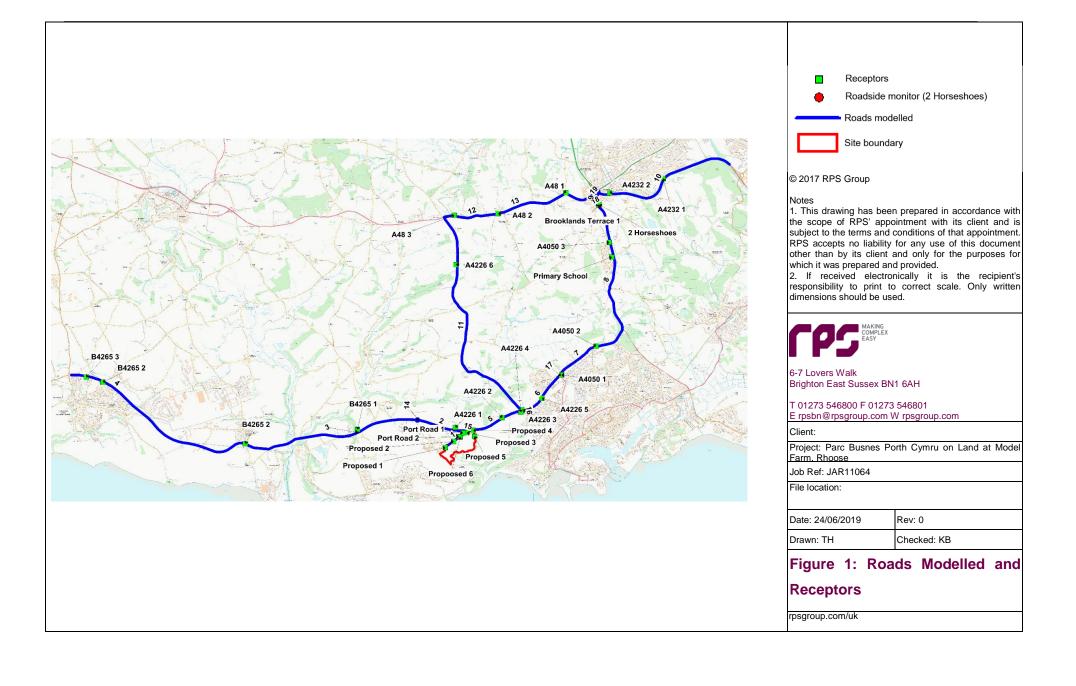
The transport of dust and dirt from the construction/demolition site onto the

Trackout public road network, where it may be deposited and then re-suspended by

vehicles using the network



Figures



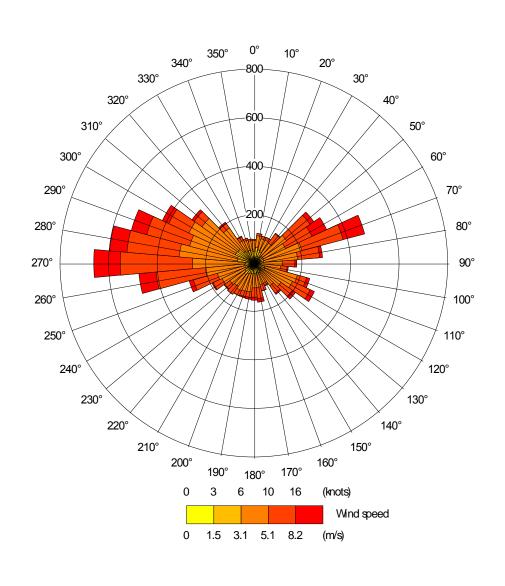


Figure 2: Wind Rose – Cardiff, 2018

Project Number	JAR11064	Project Title	Parc Busnes Porth Cymru on Land at Model Farm, Rhoose			
Olit-		Rev:	0	Drawn By:	TH	
Client:		Date:	24/06/2019	Checked By:	KB	
File location:						

© 2017 RPS Group

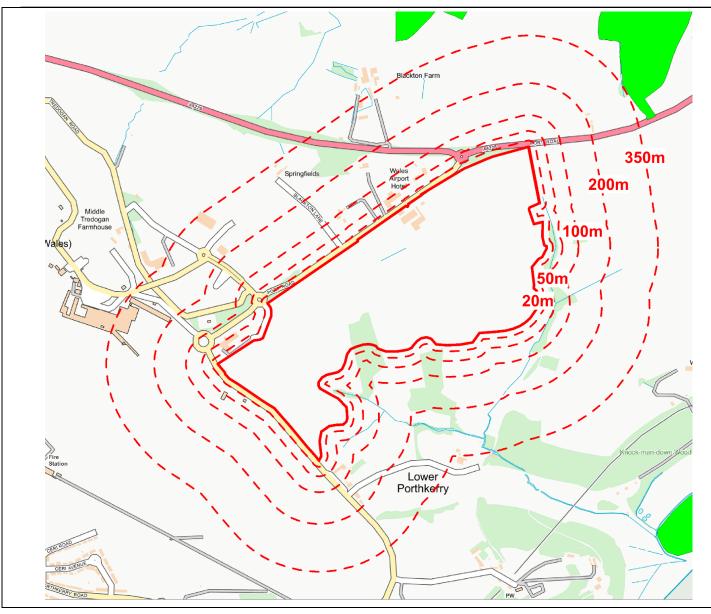
1. This drawing has been prepared in accordance with the scope of RPS' appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for Brighton East Sussex BN1 6AH appropriate the control of this document other than by its allest and activity the state of the subject to the subject to the terms and conditions of that appointment. RPS accepts no liability for Brighton East Sussex BN1 6AH any use of this document other than by its client and only for the purposes for which it was prepared and provided.

2. If received electronically it is the recipient's responsibility to print to correct scale. Only written E rpsbn@rpsgroup.com W rpsgroup.com dimensions should be used.



T 01273 546800 F 01273 546801

rpsgroup.com/uk





© 2017 RPS Group

Notes

- 1. This drawing has been prepared in accordance with the scope of RPS' appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
- 2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.



6-7 Lovers Walk Brighton East Sussex BN1 6AH

T 01273 546800 F 01273 546801 E rpsbn@rpsgroup.com W rpsgroup.com

Client:

Project: Parc Busnes Porth Cymru on Land at Model Farm Rhoose

Job Ref: JAR11064

File location:

Date: 28/06/2019	Rev: Rev 0
Drawn: TH	Checked: KB

Figure 3: Construction Dust Assessment

rpsgroup.com/uk



Appendices



Appendix A: Detailed Construction Dust Assessment Methodology

Source

A.1 The IAQM dust guidance gives examples of the dust emission magnitudes for demolition, earthworks and construction activities and trackout. These example dust emission magnitudes are based on the site area, building volume, number of HDV movements generated by the activities and the materials used. These example magnitudes have been combined with details of the period of construction activities to provide the ranking for the source magnitude that is set out in Table A.1.

Table A.1 Risk Allocation – Source (Dust Emission Magnitude)

Features of the Source of Dust Emissions	Dust Emission Magnitude
Demolition - building over 50,000 m ³ , potentially dusty construction material (e.g. concrete), onsite crushing and screening, demolition activities > 20 m above ground level.	
Earthworks – total site area over 10,000 m ² , potentially dusty soil type (e.g. clay), >10 heavy earth moving vehicles active at any one time, formation of bunds > 8 m in height, total material moved > 100,000 tonnes.	Large
Construction - total building volume over 100,000 m³, activities include piling, on-site concrete batching, sand blasting. Period of activities more than two years.	
Trackout – 50 HDV outwards movements in any one day, potentially dusty surface material (e.g. High clay content), unpaved road length > 100 m.	
Demolition - building between 20,000 to 50,000 m ³ , potentially dusty construction material and demolition activities 10 - 20 m above ground level.	
Earthworks – total site area between 2,500 to 10,000 m ² , moderately dusty soil type (e.g. silt), 5 – 10 heavy earth moving vehicles active at any one time, formation of bunds 4 - 8 m in height, total material moved 20,000 to 100,000 tonnes.	Medium
Construction - total building volume between 25,000 and 100,000 m ³ , use of construction materials with high potential for dust release (e.g. concrete), activities include piling, on-site concrete batching. Period of construction activities between one and two years.	Medium
Trackout – 10 - 50 HDV outwards movements in any one day, moderately dusty surface material (e.g. High clay content), unpaved road length 50 – 100 m.	
Demolition - building less than 20,000 m ³ , construction material with low potential for dust release (e.g. metal cladding or timber), demolition activities < 10 m above ground, demolition during winter months.	
Earthworks – total site area less than 2,500 m ² . Soil type with large grain size (e.g. sand), < 5 heavy earth moving vehicles active at any one time, formation of bunds < 4 m in height, total material moved < 10,000 tonnes earthworks during winter months.	Small
Construction - total building volume below 25,000 m³, use of construction materials with low potential for dust release (e.g. metal cladding or timber). Period of construction activities less than one year.	



Features of the Source of Dust Emissions	Dust Emission Magnitude
Trackout – < 10 HDV outwards movements in any one day, surface material with low potential for dust release, unpaved road length < 50 m.	

Pathway and Receptor - Sensitivity of the Area

- A.2 Pathway means the route by which dust and particulate matter may be carried from the source to a receptor. The main factor affecting the pathway effectiveness is the distance from the receptor to the source. The orientation of the receptors to the source compared to the prevailing wind direction is a relevant risk factor for long-duration construction projects; however, short-term construction projects may be limited to a few months when the most frequent wind direction might be quite different, so adverse effects can potentially occur in any direction from the site.
- A.3 As set out in the IAQM dust guidance, a number of attempts have been made to categorise receptors into high, medium and low sensitivity categories; however there is no unified sensitivity classification scheme that covers the quite different potential effects on property, human health and ecological receptors.
- A.4 Table A.2 and Table A.3 sets out the IAQM basis for categorising the sensitivity of people and property to dust and PM₁₀ respectively. Table A.4 sets out the basis for determining the sensitivity of ecological receptors to dust.

Table A.2 Sensitivities of People and Property Receptors to Dust

Receptor	Sensitivity
Principles:- Users can reasonably expect enjoyment of a high level of amenity; or the appearance, aesthetics or value of their property would be diminished by soiling; and the people or property would reasonably be expected to be present continuously, or at least regularly for extended periods as part of the normal pattern of use of the land. Indicative Examples:- Dwellings. Museums and other culturally important collections. Medium and long-term car parks and car showrooms.	High
 Principles:- Users would expect to enjoy a reasonable level of amenity, but would not reasonably expect to enjoy the same level of amenity as in their home; or the appearance, aesthetics or value of their property could be diminished by soiling; or the 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. 	Medium



Receptor	Sensitivity
Indicative Examples:-	
Parks.	
Places of work.	
Principles:-	
the enjoyment of amenity would not reasonably be expected; or	
there is property that would not reasonably be expected to be diminished in appearance, aesthetics or value by soiling; or	
• there is transient exposure, where the people or property would reasonably be expected to be present only for limited periods of time as part of the normal pattern of use of the land.	Low
Indicative Examples:-	
Playing fields, farmland (unless commercially-sensitive horticultural).	
Footpaths and roads.	
Short-term car parks.	

Table A.3 Sensitivities of People and Property Receptors to PM₁₀

Receptor	Sensitivity
 Principles:- Locations where members of the public are exposed over a time period relevant to the air quality objective (in the case of the 24-hour objective for PM₁₀, a relevant location would be one where individuals may be exposed for eight hours or more in a day). Indicative Examples:- Residential properties. Schools, hospitals and residential care homes. 	High
Principles:- Locations where the people exposed are workers and exposure is over a time period relevant to the air quality objective (in the case of the 24-hour objective for PM ₁₀ , a relevant location would be one where individuals may be exposed for eight hours or more in a day). Indicative Examples:- Office and shop workers (but generally excludes workers occupationally exposed to PM ₁₀ as protection is covered by Health and Safety at Work legislation).	Medium
Principles:- Locations where human exposure is transient exposure. Indicative Examples:- Public footpaths. Playing fields, parks. Shopping streets.	Low



Table A.4 Sensitivities of Ecological Receptors to Dust

Receptor					
 Principles:- Locations with an international or national designation and the designated features may be affected by dust soiling; or locations where there is a community of a particularly dust sensitive species such as vascular species included in the Red Data List For Great Britain. Indicative Examples:- Special Area of Conservation (SAC) designated for acid heathlands adjacent to the demolition of a large site containing concrete (alkali) buildings or for the presence of lichen. 	High				
Principles:- Locations where there is a particularly important plant species, where its dust sensitivity is uncertain or unknown; or locations with a national designation where the features may be affected by dust deposition. Indicative Examples:- Site of Special Scientific Interest (SSSI) with dust sensitive features.	Medium				
Principles:- • Locations with a local designation where the features may be affected by dust deposition. Indicative Examples:- • A Local Nature Reserve with dust sensitive features	Low				

A.5 The IAQM methodology combines consideration of the pathway and receptor to derive the 'sensitivity of the area'. Table A.5, Table A.6 and Table A.7 show how the sensitivity of the area has been derived for this assessment.

Table A.5 Sensitivity of the Area to Dust Soiling Effects on People and Property

Receptor Sensitivity	Number of Receptors ^a	Distance from the Source (m) ^b				
,		<20	<50	<100	<350	
	>100	High	High	Medium	Low	
High	10-100	High	Medium	Low	Low	
	1-10	Medium	Low	Low	Low	
Medium	>1	Medium	Low	Low	Low	
Low	>1	Low	Low	Low	Low	
The sensitivity of the area has been derived for demolition, construction, earthworks and trackout.						



a The total number of receptors within the stated distance has been estimated. Only the highest level of area sensitivity from the table has been recorded.

b For trackout, the distances have been measured from the side of the roads used by construction traffic. Without site-specific mitigation, trackout may occur from roads up to 500 m from large sites, 200 m from medium sites and 50 m from small sites, as measured from the site exit. The impact declines with distance from the site, and trackout impacts have only been considered up to 50 m from the edge of the road.

Table A.6 Sensitivity of the Area to Human Health Impacts

Receptor	Annual Mean PM ₁₀	Number of					
Sensitivity	Concentration	Receptors b, c	<20	<50	<100	<200	<350
		>100	High	High	High	Medium	Low
	> 32 µg.m ⁻³	10-100	High	High	Medium	Low	Low
		1-10	High	Medium	Low	Low	Low
		>100	High	High	Medium	Low	Low
	28 - 32 μg.m ⁻³	10-100	High	Medium	Low	Low	Low
Lliah		1-10	High	Medium	Low	Low	Low
High	24 - 28 μg.m ⁻³	>100	High	Medium	Low	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	< 24 μg.m ⁻³	>100	Medium	Low	Low	Low	Low
		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	> 32 μg.m ⁻³	>10	High	Medium	Low	Low	Low
Medium		1 – 10	Medium	Low	Low	Low	Low
ivieulum	28 – 32 μg.m ⁻³	> 10	Medium	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	< 28 μg.m ⁻³	>1	Low	Low	Low	Low	Low
Low	-	>1	Low	Low	Low	Low	Low

The sensitivity of the area has been derived for demolition, construction, earthworks and trackout.

a This refers to the background concentration derived from the assessment of baseline conditions later in this report. The concentration categories listed in this column apply to England, Wales and Northern Ireland but not to Scotland.



Receptor	Annual Mean PM ₁₀	Number of	Distance from the Source (m) d				
Sensitivity	Concentration	Receptors 5, 5	<20	<50	<100	<200	<350

b The total number of receptors within the stated distance has been estimated. Only the highest level of area sensitivity from the table has been recorded.

Table A.7 Sensitivity of the Area to Ecological Impacts

Receptor Sensitivity	Distance from the Source (m) ^a			
Receptor Sensitivity	<20	<50		
High	High	Medium		
Medium	Medium	Low		
Low	Low	Low		

The sensitivity of the area has been derived for demolition, construction, earthworks and trackout and for each designated site.

a Only the highest level of area sensitivity has been recorded.

- A.6 The IAQM dust guidance lists the following additional factors that can potentially affect the sensitivity of the area and, where necessary, professional judgement has been used to adjust the sensitivity allocated to a particular area:
 - 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 the receptors;
 - any conclusions drawn from analysing local meteorological data which accurately represent the area; and if relevant the season during which the 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
 - any known specific receptor sensitivities which are considered go beyond the classifications given in the table above.

c For high sensitivity receptors with high occupancy (such as schools or hospitals), the approximate number of occupants has been used to derive an equivalent number of receptors.

d For trackout, the distances have been measured from the side of the roads used by construction traffic. Without site-specific mitigation, trackout may occur from roads up to 500 m from large sites, 200 m from medium sites and 50 m from small sites, as measured from the site exit. The impact declines with distance from the site, and trackout impacts have only been considered up to 50 m from the edge of the road.



A.7 The matrices in Table A.8, Table A.9, Table A.10 and Table A.11 have been used to assign the risk for each activity to determine the level of mitigation that should be applied. For those cases where the risk category is 'negligible', no mitigation measures are required beyond those mandated by legislation.

Table A.8 Risk of Dust Impacts - Demolition

Sensitivity of Area	Dust Emission Magnitude			
Sensitivity of Area	Large	Medium	Small	
High	High Risk	Medium Risk	Medium Risk	
Medium	High Risk	Medium Risk	Low Risk	
Low	Medium Risk	Low Risk	Negligible	

Table A.9 Risk of Dust Impacts – Earthworks

Sensitivity of Area	Dust Emission Magnitude			
Sensitivity of Area	Large	Medium	Small	
High	High Risk	Medium Risk	Low Risk	
Medium	Medium Risk	Medium Risk	Low Risk	
Low	Low Risk	Low Risk	Negligible	

Table A.10 Risk of Dust Impacts – Construction

Sensitivity of Area	Dust Emission Magnitude			
Sensitivity of Area	Large	Medium	Small	
High	High Risk	Medium Risk	Low Risk	
Medium	Medium Risk	Medium Risk	Low Risk	
Low	Low Risk	Low Risk	Negligible	

Table A.11 Risk of Dust Impacts - Trackout

Sonsitivity of Area	Dust Emission Magnitude			
Sensitivity of Area	Large	Medium	Small	
High	High Risk	Medium Risk	Low Risk	
Medium	Medium Risk	Low Risk	Negligible	
Low	Low Risk	Low Risk	Negligible	



Appendix B: Model Comparison Study

- B.1 The approach to model verification that LAQM.TG16 recommends for local authorities when they carry out their LAQM duties is summarised in Section 3. For the verification and adjustment of NO_x /NO₂ concentrations, the guidance recommends that the comparison considers a broad spread of automatic and diffusion-tube monitoring. There is no broad spread of automatic and diffusion-tube monitoring. A formal verification study has not been undertaken; however, a comparison of modelled and monitored data has been undertaken.
- B.2 The concentrations monitored over recent years in roadside locations are provided in Table B.1.

Table B.1 Measured Annual-mean NO₂ Concentrations (µg.m⁻³)

Manitoring ID	Manitarina Cita	Measured Annual-mean NO ₂ Concentrations (µg.m ⁻³)			
Monitoring ID	Monitoring Site	2015	2016	2017	2018
38	2 Horseshoes	23.3	25.9	19.6	19.4

- B.3 The measured concentrations range from 19.4 μ g.m⁻³ to 25.9 μ g.m⁻³ and there is evidence of a decrease over time.
- B.4 The monitored annual-mean NO_x road contribution at 2 Horseshoes has been derived from the monitored annual-mean NO_2 concentration using the LAQM.TG16 calculator. The monitored annual-mean NO_x road contribution has then been compared with the modelled annual-mean NO_x road contribution. This comparison including the ratio of monitored/modelled road contribution NO_x is provided in Table B.2 below.

Table B.2 Comparison of Monitored and Modelled Annual-mean Road NO_x Contribution ($\mu g.m^{-3}$)

Monitoring ID	Monitoring Site	Annual-mean Road NO _X Contribution ng Site (µg.m ⁻³)		
שו		Monitored	Modelled	Ratio of Monitored/Modelled road contribution NO _X
38	2 Horseshoes	9.3	12.4	0.7

- B.5 It should be borne in mind that the monitored concentrations are themselves only estimates to the true concentrations at each point; the EU Directive on air quality designates passive NO₂ samplers indicative measures with a potential uncertainty of +/-30 %.
- B.6 The results show that the model is slightly over-predicting. To be conservative the modelled annual-mean NO₂ concentrations have been derived from the modelled annual-mean NO_x road contributions, and no correction factor has been applied. The modelled annual-mean NO₂ concentrations and monitored annual-mean NO₂ concentrations are provided in Table B.3 below.



Table B.3 Comparison of Monitored and Modelled Annual-mean Road NO₂ Concentrations (μg.m⁻³)

Monitoring ID	Monitoring Site	Monitored NO ₂	Modelled NO ₂	Modelled – Monitored as percentage of Monitored
38	2 Horseshoes	19.4	21.0	8.2

B.7 The results indicate that the modelled concentration is within 25% of the measured concentration at 2 Horseshoes. This suggests that the model performance is acceptable.



References

- 1 Council Directive 2008/50/EC of 21 May 2008 on ambient air quality and cleaner air for Europe.
- 2 Defra, 2010, The Air Quality Standards Regulations.
- Defra, 2007, The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. Volume 2.
- Planning Policy Wales (March 2007) Technical Advice Note 18: Transport
- Welsh Assembly Government, 2008, One Wales: Connecting the Nation
- 6 EPUK & IAQM (January 2017) Land-Use Planning & Development Control: Planning For Air Quality
- 7 IAQM (2014) Guidance on the assessment of dust from demolition and construction
- 8 Defra (2016) Local Air Quality Management Technical Guidance, 2016 (LAQM.TG16)
- 9 British Standard Institute (1983) BS 6069:Part 2:1983, ISO 4225-1980 Characterization of air quality. Glossary
- 10 http://laqm.defra.gov.uk/review-and-assessment/tools/tools.html
- Drawn from Defra Maps at http://uk-air.defra.gov.uk/data/laqm-background-maps?year=2017
- 12 IAQM, 2012, Air Quality Monitoring in the Vicinity of Demolition and Construction Sites



Contact

Thomas Hackney Assistant Air Quality Consultant RPS Consulting Services Ltd 6-7 Lovers Walk Brighton BN1 6AH

T: +44(0) 1237 546 800

E: tom.hackney@rpsgroup.com

