

Oldlands Farm, Newlands Road, Bognor Regis



Air Quality Assessment

784-B027957

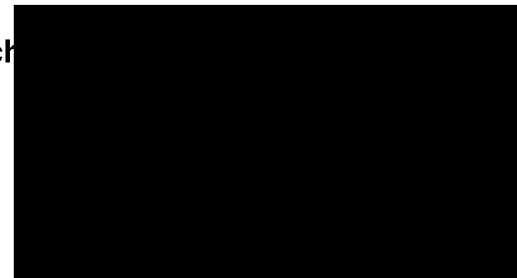
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EXECUTIVE SUMMARY

This report presents the findings of an air quality assessment to accompany an application for the erection of a warehouse (Use Class B8) with ancillary office, associated vehicle parking, van storage, plant, ancillary structures, lighting, landscaping and infrastructure works including earthworks to facilitate flood compensation area at land at Oldlands Farm, Newlands Road, Bognor Regis.

Construction Phase

The potential effects during the demolition and construction phases include fugitive dust emissions from site activities, such as earthworks, construction and trackout. The impacts during the operational phase take into account exhaust emissions from additional road traffic generated due to the proposed development.

During the construction phase, site specific mitigation measures detailed within this assessment will be implemented. With these mitigation measures in place, the effects from the construction phase are not predicted to be significant.

Operational Phase

Detailed dispersion modelling of traffic pollutants has been undertaken for the proposed development. An operational year assessment for 2022 traffic emissions has been undertaken to assess the effects of the Proposed Development. The impacts during the operational phase take into account exhaust emissions from additional road traffic generated due to the proposed development.

The long-term (annual) assessment of the effects associated with the proposed development with respect to Nitrogen Dioxide (NO₂) is determined to be 'negligible'. With respect to PM₁₀ and PM_{2.5} exposure, the effect is determined to be 'negligible' at all identified existing sensitive receptor locations.

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ACRONYMS/ABBREVIATIONS

Acronyms/Abbreviations	Definition
AADT	Annual Average Daily Traffic
ADMS	Atmospheric Dispersion Modelling Software
AQAL	the Air Quality Assessment Level
AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
AQO	Air Quality Objectives
AQS	Air Quality Standards
CHP	Combined Heat and Power
CL	Critical Level
CO	Carbon Monoxide
DEFRA	Department for Environment Food & Rural Affairs
EAL	Environmental Assessment Limits
EC	European Commission
EFT	The Emissions Factors Toolkit
EPUK	Environmental Protection UK
EU	European Union
EPAQS	The Expert Panel on Air Quality Standards
IAQM	The Institute of Air Quality Management
LA	Local Authority
LAQM	Local Air Quality Management
NGR	The United Kingdom National Grid Reference
NO	Nitric Oxide
NO ₂	Nitrogen Dioxide
PC	Process Contribution
MHCLG	the Ministry for Housing, Communities and Local Government
NPPF	The National Planning Policy Framework
OS	the UK Ordnance Survey
PEC	Predicted Environment Concentration
PPG	Planning Policy Guidance
PPS	Planning Policy Statements
SAC	Special Areas of Conservation
SPA	Special Protection Area
SSSI	Sites of Special Scientific Interest
VOC	Volatile organic compounds
WHO	World Health Organization

Acronyms/Abbreviations	Definition
UK	The United Kingdom

1.0 INTRODUCTION

This report presents the findings of an air quality assessment to accompany an application for the erection of a warehouse (Use Class B8) with ancillary office, associated vehicle parking, van storage, plant, ancillary structures, lighting, landscaping and infrastructure works including earthworks to facilitate flood compensation area at land at Oldlands Farm, Newlands Road, Bognor Regis.

1.1 SITE LOCATION

The central Grid Reference is approximately 494557, 101831. The application site is bounded to the north by bare land next to the A259, bounded to the east and west by open farmland and to the south by a warehouse.

Reference should be made to **Figure 1-1** for a map of the application site and flood compensation area.

Figure 1-1. Satellite Image of Site and Surrounding Area



Google Imagery (2021)

1.2 CONTEXT

The primary source of the air quality associated with the proposed scheme is from vehicle movements, arriving and departing the proposed development. The traffic data generated by the development (provided by Tetra Tech Ltd) has been assessed at the surrounding sensitive receptors and proposed sensitive receptors.

The following assessment stages have been undertaken as part of this assessment:

- Baseline evaluation;
- Assessment of potential air quality impacts during the construction phase;
- Assessment of potential air quality impacts during the operational phase; and,

- Identification of mitigation measures (as required).

The results of the assessment are detailed in the following sections of this report.

The construction phase assessment considers the potential effects of dust and particulate emissions from site activities and materials movement using a qualitative risk assessment method based on the Institute of Air Quality Management's (IAQM) 'Guidance on the Assessment of Dust from Demolition and Construction' document, published in 2014.

The assessment of the potential air quality impacts that are associated with the operational phase has focused on the predicted impact of changes in ambient nitrogen dioxide (NO₂) and particulate matter with an aerodynamic diameter of less than 10 µm (PM₁₀) and less than 2.5 µm (PM_{2.5}) as a result of the development at key local receptor locations. The changes have been referenced to EU air quality limits and UK air quality objectives and the magnitude and impact description of the changes have been referenced to non-statutory guidance issued by the IAQM and Environmental Protection UK (EPUK).

1.3 REPORT STRUCTURE

Following this introductory section, the remainder of this report is structured as follows:

- Section 2: Policy and Legislative Context
- Section 3: Assessment Methodology
- Section 4: Survey Methodology
- Section 5: Baseline Conditions
- Section 6: Assessment of Air Quality Impacts – Construction Phase
- Section 7: Assessment of Air Quality Impacts – Operational Phase
- Section 8: Mitigation
- Section 9: Conclusions

All technical Appendices are included at the end of this report for information.

2.0 POLICY AND LEGISLATIVE CONTEXT

2.1 DOCUMENTS CONSULTED

The following documents were consulted during the undertaking of this assessment:

Legislation and Best Practice Guidance

- National Planning Policy Framework, Ministry for Housing, Communities and Local Government, Revised February 2019;
- Planning Practice Guidance: Air Quality, Ministry for Housing, Communities and Local Government, November 2019;
- The Air Quality Standards Regulations (Amendments), 2016;
- The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, Defra, 2007;
- The Environment Act, 1995;
- Local Air Quality Management Technical Guidance LAQM.TG16, Defra, 2021;
- Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1, LA 105 Air quality, Highways England, November 2019;
- Land-Use Planning & Development Control: Planning for Air Quality, EPUK & IAQM, 2017;
- Guidance on the Assessment of Dust from Demolition and Construction, IAQM, 2014;
- A Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites (Version 1.0), IAQM, May 2020; and,
- Ecological Assessment of Air Quality Impacts, CIEEM, January 2021.

Websites Consulted

- Google maps (maps.google.co.uk);
- The UK National Air Quality Archive (www.airquality.co.uk);
- Department for Transport Matrix (www.dft.gov.uk/matrix);
- emapsite.com;
- Multi-Agency Geographic Information for the Countryside (<http://magic.defra.gov.uk/>);
- Planning Practice Guidance (<http://planningguidance.planningportal.gov.uk/>); and,
- Arun District Council (<https://www.arun.gov.uk/>).

Site Specific Reference Documents

- Arun District Council, Air Quality Annual Status Report 2020; and,
- Arun District Council, Adoption Arun Local Plan 2011-2031 (Adopted July 2018).

2.2 AIR QUALITY LEGISLATIVE FRAMEWORK

European Legislation

European air quality legislation is consolidated under Directive 2008/50/EC, which came into force on 11th June 2008. This Directive consolidates previous legislation which was designed to deal with specific pollutants in a consistent manner and provides new air quality objectives for fine particulates. The consolidated Directives include:

- **Directive 1999/30/EC** – the First Air Quality "Daughter" Directive – sets ambient air limit values for NO₂ and oxides of nitrogen, sulphur dioxide, lead and PM₁₀;
- **Directive 2000/69/EC** – the Second Air Quality "Daughter" Directive – sets ambient air limit values for benzene and carbon monoxide; and,
- **Directive 2002/3/EC** – the Third Air Quality "Daughter" Directive – seeks to establish long-term objectives, target values, an alert threshold and an information threshold for concentrations of ozone in ambient air.

The fourth daughter Directive was not included within the consolidation and is described as:

- **Directive 2004/107/EC** – sets health-based limits on polycyclic aromatic hydrocarbons, cadmium, arsenic, nickel and mercury, for which there is a requirement to reduce exposure to as low as reasonably achievable.

The European Commission (EC) Directive Limits, outlined above, have been transposed in the UK through the Air Quality Standards Regulations. In the UK responsibility for meeting ambient air quality limit values is devolved to the national administrations in Scotland, Wales and Northern Ireland.

The European Union (Withdrawal) Act 2018 (EUWA) provides a new framework for the continuity of 'retained EU law' in the UK. EU Directives no longer have to be implemented by the UK except to any extent agreed or decided by the UK unilaterally.

EUWA retains the domestic effect of EU Directives to the extent already implemented in UK law, by preserving the relevant domestic implementing legislation enacted in UK law before 'Implementation Period' completion day. Though the EU Directives are not retained, following the UK's departure from the EU, the EUWA converts the current framework of Air Quality targets, however the role that the EU instructions were party to are lost.

UK Legislation

The Air Quality Standards Regulations (Amendments 2016) seek to simplify air quality regulation and provide a new transposition of the Air Quality Framework Directive, First, Second and Third Daughter Directives and also transpose the Fourth Daughter Directive within the UK. The Air Quality Limit Values are transposed into the updated Regulations as Air Quality Standards, with attainment dates in line with the European Directives. SI 2010 No. 1001, Part 7 Regulation 31 extends powers, under Section 85(5) of the Environment Act (1995), for the Secretary of State to give directions to Local Authorities (LAs) for the implementation of these Directives.

The UK Air Quality Strategy is the method for implementation of the air quality limit values in England, Scotland, Wales and Northern Ireland and provides a framework for improving air quality and protecting human health from the effects of pollution.

For each nominated pollutant, the Air Quality Strategy sets clear, measurable, outdoor air quality standards and target dates by which these must be achieved; the combined standard and target date is referred to as the Air Quality Objective (AQO) for that pollutant. Adopted national standards are based on the recommendations of the Expert Panel on Air Quality Standards (EPAQS) and have been translated into a set of Statutory Objectives within the Air Quality (England) Regulations (2000) SI 928, and subsequent amendments.

The AQOs for pollutants included within the Air Quality Strategy and assessed as part of the scope of this report are presented in **Table 2-1** and **Table 2-2** along with European Commission (EC) Directive Limits and World Health Organisation (WHO) Guidelines. The ecological levels are based on WHO and CLRTAP (Convention on Long-range Transboundary Air Pollution) guidance.

Table 2-1. Air Quality Standards, Objectives, Limits and Target Values

Pollutant	Applies	Objective	Concentration Measured as ¹⁰	Date to be achieved and maintained thereafter	European Obligations	Date to be achieved and maintained thereafter	New or existing
PM ₁₀	UK	50µg/m ³ by end of 2004 (max 35 exceedances a year)	24-hour Mean	1 st January 2005	50µg/m ³ by end of 2004 (max 35 exceedances a year)	1 st January 2005	Retain Existing
	UK	40µg/m ³ by end of 2004	Annual Mean	1 st January 2005	40µg/m ³	1 st January 2005	
PM _{2.5}	UK	25µg/m ³	Annual Mean	31 st December 2010	25µg/m ³	1 st January 2010	Retain Existing
NO ₂	UK	200µg/m ³ not to be exceeded more than 18 times a year	1-Hour Mean	31 st December 2005	200µg/m ³ not to be exceeded more than 18 times a year	1 st January 2010	Retain Existing
	UK	40µg/m ³	Annual Mean	31 st December 2005	40µg/m ³	1 st January 2010	

Table 2-2. Ecological Air Quality Standards, Objectives, Limit and Target Values

Pollutant	Applies	Objective	Concentration Measured as
NO _x	UK	30µg/m ³	Annual Mean

Within the context of this assessment, the annual mean objectives are those against which facades of residential receptors will be assessed and the short-term objectives apply to all other receptor locations, where people may

be exposed over a short duration, both residential and non-residential such as using gardens, balconies, walking along streets, using playgrounds, footpaths or external areas of employment uses.

Local Air Quality Management

Under Section 82 of the Environment Act (1995) (Part IV) Local Authorities (LAs) are required to periodically review and assess air quality within their area of jurisdiction under the system of Local Air Quality Management (LAQM). This review and assessment of air quality involves assessing present and likely future air quality against the AQOs. If it is predicted that levels at the façade of buildings where members of the public are regularly present (normally residential properties) are likely to be exceeded, the LA is required to declare an Air Quality Management Area (AQMA).

2.3 PLANNING AND POLICY GUIDANCE

National Policy

The National Planning Policy Framework (NPPF), revised February 2019, principally brings together and summarises the suite of Planning Policy Statements (PPS) and Planning Policy Guidance (PPG) which previously guided planning policy making. The NPPF (para. 181) states that:

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

The Planning Practice Guidance (PPG) web-based resource was updated by the Ministry for Housing, Communities and Local Government (MHCLG) on 1st November 2019 to support the National Planning Policy Framework and make it more accessible. A review of PPG: Air Quality identified the following guidance (Paragraph: 001 Reference ID: 32-001-20191101):

“The 2008 Ambient Air Quality Directive sets legally binding limits for concentrations in outdoor air of major air pollutants that affect public health such as particulate matter (PM₁₀ and PM_{2.5}) and nitrogen dioxide (NO₂).

The UK also has national emission reduction commitments for overall UK emissions of 5 damaging air pollutants:

- * *fine particulate matter (PM_{2.5});*
- * *ammonia (NH₃);*
- * *nitrogen oxides (NO_x);*

- sulphur dioxide (SO₂); and
- non-methane volatile organic compounds (NMVOCs).

As well as having direct effects on public health, habitats and biodiversity, these pollutants can combine in the atmosphere to form ozone, a harmful air pollutant (and potent greenhouse gas) which can be transported great distances by weather systems. Odour and dust can also be a planning concern, for example, because of the effect on local amenity."

Local Policy

Following a review of the Adoption Arun Local Plan 2011-2031 (Adopted July 2018), the following policy concerning air quality was identified.

"Policy QE DM3: Air Pollution

All major development proposals will be required to assess the likely impacts of the development on air quality and mitigate any negative impacts by:

- a. Ensuring the development is located within easy reach of established public transport services;*
- b. Maximising provision for cycling and pedestrian facilities;*
- c. Encouraging the use of cleaner transport fuels on site, through the inclusion of electric car charging points; and*
- d. Contributing towards the improvement of the highway network where the development is predicted to result in increased congestion on the highway network.*

Development proposed nearby any Air Quality Management Area (AQMA) declared within the District within the Plan period, will require an air quality assessment to identify likely impacts of development upon the designated area. Developers will be required to ensure delivery of the actions set out within any Air Quality Action Plan.

Industrial development which is regulated by environmental permits (that creates or results in dust, smell, fumes, smoke, heat, radiation, gases, steam or other forms of pollution) must be located in such a position which ensures that the health, safety and amenity of users of the site or surrounding land is not put at risk and the quality of the environment would not be damaged or put at risk.

Developments shall also be consistent with all other Local Plan policies."

3.0 ASSESSMENT METHODOLOGY

The potential environmental effects of the operational phase of the proposed development have been identified as proposed vehicle movements. The significance of potential environmental effects is assessed according to the latest guidance produced by EPUK and IAQM in January 2017 '*Land-Use Planning & Development Control: Planning for Air Quality*' and May 2020 '*A Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites*'.

The methodology used to determine the potential air quality effects of the construction phase of the proposed development has been derived from the IAQM '*Guidance on the Assessment of the Impacts of Dust from Demolition and Construction*' document and is summarised in Section 5.

3.1 DETERMINING IMPACT DESCRIPTION OF THE AIR QUALITY EFFECTS

The impact description of the effects during the operational phase of the development is based on the latest guidance produced by EPUK and IAQM in January 2017. The guidance provides a basis for a consistent approach that could be used by all parties associated with the planning process to professionally judge the overall impact description of the air quality effects based on severity of air quality impacts.

The following rationale is used in determining the severity of the air quality effects at individual receptors:

1. The change in concentration of air pollutants, air quality effects, are quantified and evaluated in the context of AQOs. The effects are provided as a percentage of the Air Quality Objective (AQO), which may be an AQO, EU limit or target value, or an Environment Agency 'Environmental Assessment Level (EAL)';
2. The absolute concentrations are also considered in terms of the AQO and are divided into categories for long term concentration. The categories are based on the sensitivity of the individual receptor in terms of harm potential. The degree of harm potential to change increases as absolute concentrations are close to or above the AQO;
3. Severity of the effect is described as qualitative descriptors; negligible, slight, moderate or substantial, by taking into account in combination the harm potential and air quality effect. This means that a small increase at a receptor which is already close to or above the AQO will have higher severity compared to a relatively large change at a receptor which is significantly below the AQO;
4. The effects can be adverse when pollutant concentrations increase or beneficial when concentrations decrease as a result of development;
5. The judgement of overall impact description of the effects is then based on severity of effects on all the individual receptors considered; and,
6. Where a development is not resulting in any change in emissions itself, the impact description of effect is based on the effect of surrounding sources on new residents or users of the development, i.e., will they be exposed to levels above the AQO.

Table 3-1. Impact Descriptors for Individual Receptors

Long term average concentration at receptor in assessment year	% Change in concentration relative to AQO			
	1	2-5	6-10	>10
≤75% of AQO	Negligible	Negligible	Slight	Moderate
76-94% of AQO	Negligible	Slight	Moderate	Moderate
95-102% of AQO	Slight	Moderate	Moderate	Substantial
103-109 of AQO	Moderate	Moderate	Substantial	Substantial
≥110 of AQO	Moderate	Substantial	Substantial	Substantial

In accordance with explanation note 2 of Table 6.3 of the EPUK & IAQM guidance, 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.

4.0 BASELINE CONDITIONS

4.1 AIR QUALITY REVIEW

This section provides a review of the existing air quality in the vicinity of the application site in order to provide a benchmark against which to assess potential air quality impacts of the proposed development. Baseline air quality in the vicinity of the application site has been defined from several sources, as described in the following sections.

Local Air Quality Management (LAQM)

As required under section 82 of the Environment Act 1995, Arun District Council (ADC) has undertaken an ongoing exercise to review and assess air quality within its area of jurisdiction. The assessments have indicated that concentrations of NO₂ are not above the relevant AQOs at any locations of relevant public exposure within the Borough. Therefore, ADC has not designated any Air Quality Management Area (AQMA).

Air Quality Monitoring

Monitoring of air quality within ADC has been undertaken through non-continuous monitoring methods in 2019. These have been reviewed in order to provide an indication of existing air quality in the area surrounding the application site. The most recent monitoring data within ADC was undertaken during 2019.

Non - Continuous Monitoring

ADC operates a network of 17 passive diffusion tubes. The closest diffusion tube is diffusion tube Bog12, which is located approximately 1 km south west of the application site. The most recently available diffusion tube data is from 2019 which is presented in **Table 4-1**.

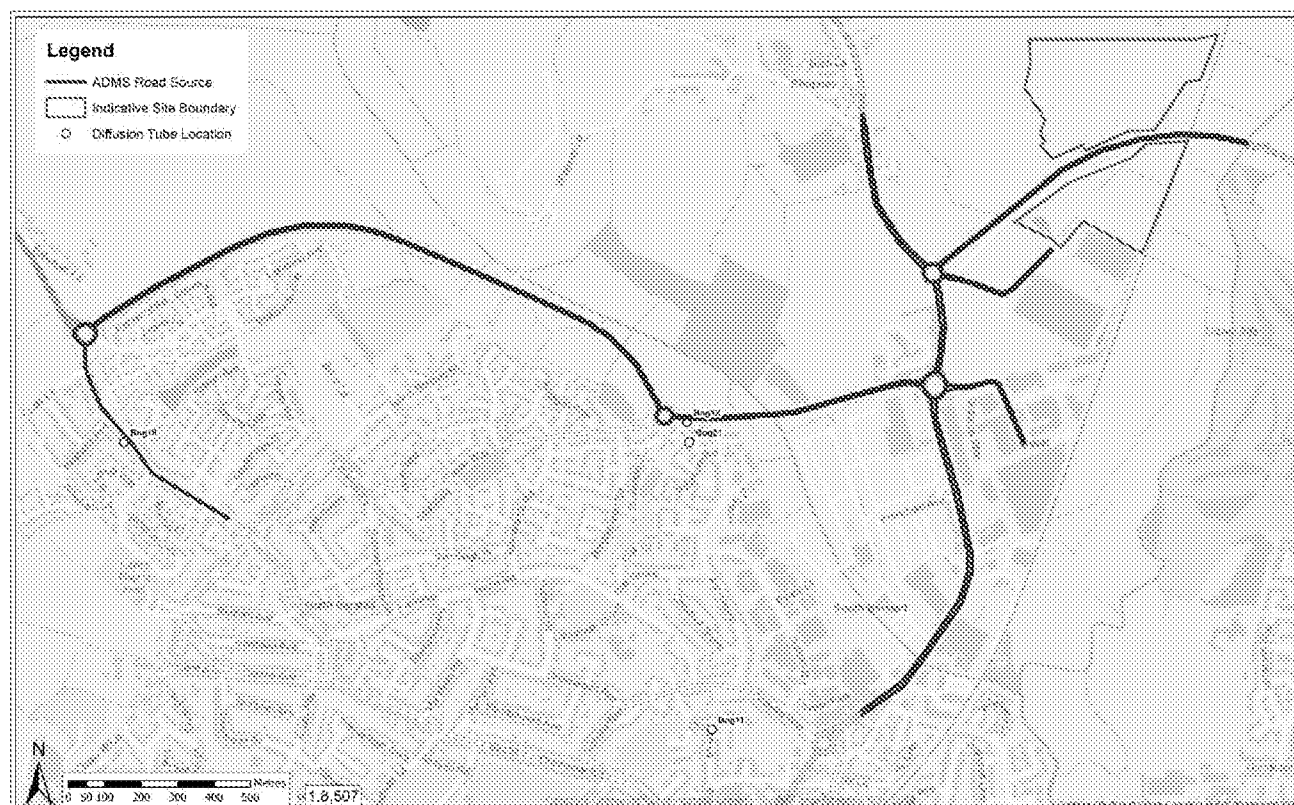
Table 4-1. Monitored Annual Mean NO₂ Concentrations at Diffusion Tubes

Site ID	Site Type	Distance from Kerb (m)	Inlet Height (m)	Monitored 2019 Annual Mean NO ₂ Concentration (µg/m ³)
Bog12	Roadside	1.5	2.8	26
Bog18	Roadside	11.5	2.0	18

As indicated in **Table 4-1**, all diffusion tubes located within the Air Quality Assessment area monitored annual average NO₂ concentrations below the AQO for NO₂ (40 µg/m³ annual mean) during 2019.

It should be noted that as part of the model verification a review of diffusion tubes locations and monitoring heights was undertaken. As part of this process, the locations and monitoring heights were adjusted following desk-based review using Google Maps.

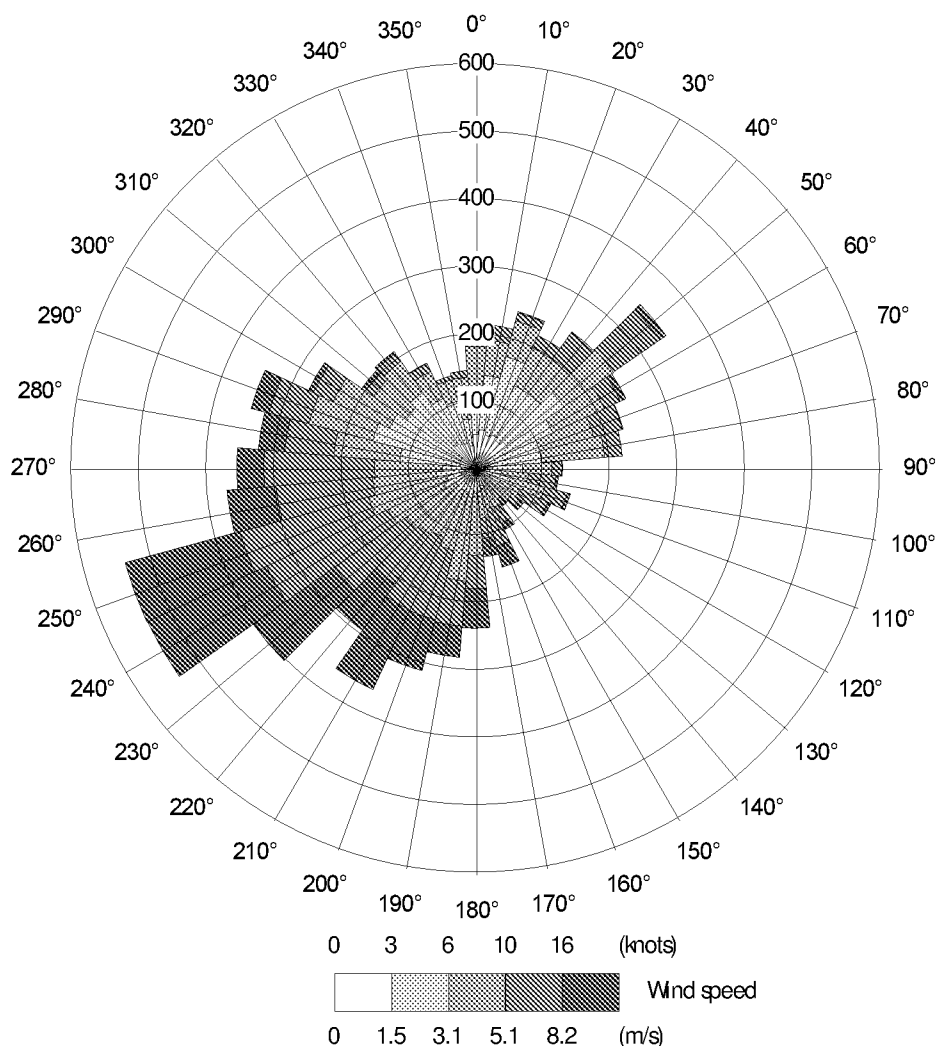
Figure 4-1. Local Authority Monitoring Locations



4.2 METEOROLOGY

Meteorological conditions have significant influence over air pollutant concentrations and dispersion. Pollutant levels can vary significantly from hour to hour as well as day to day, thus any air quality predictions need to be based on detailed meteorological data. The ADMS (Atmospheric Dispersion Modelling System) model calculates the dispersion of pollutants on an hourly basis using a year of local meteorological data.

The 2019 meteorological data used in the assessment is derived from Thorney Island Meteorological Station. This is the nearest meteorological station, which is considered representative of the application site, with all the complete parameters necessary for the ADMS model. Reference should be made to **Figure 4-2** for an illustration of the prevalent wind conditions at Thorney Island Meteorological Station site.

Figure 4-2. Thorney Island 2019 Wind Rose

4.3 EMISSION SOURCES

A desktop assessment has identified that traffic movements are likely to be the most significant local source of pollutants affecting the site and its surroundings. The principal traffic derived pollutants likely to impact local receptors are NO₂, PM₁₀ and PM_{2.5}.

The assessment has therefore modelled all roads within the immediate vicinity of the application site which are considered likely to experience significant changes in traffic flow as a result of the proposed development. Reference should be made to **Figure A-1** for a graphical representation of the traffic data utilised within the ADMS Roads 5.0 model.

It should be noted that the pollutant contribution of minor roads and rail sources that are not included within the dispersion model is considered to be accounted for via the use of background air quality levels.

4.4 SENSITIVE RECEPTORS

Receptors that are considered as part of the air quality assessment are primarily those existing receptors that are situated along routes predicted to experience significant changes in traffic flow as a result of the proposed development.

The existing receptor locations are summarised in **Table 4-2** and the spatial locations of all of the receptors are illustrated in **Figure 4-3**.

Table 4-2. Modelled Sensitive Receptor Locations

	Existing Sensitive Receptor	X	Y	Receptor Height (m)
R1	Residential property at 432 Chichester Road	491840	101139	1.5
R2	Residential property at 27 Chichester Road	491750	101388	1.5
R3	Residential property at 28 Crossfields	492262	101714	1.5
R4	Residential property at 23 Stoneage Close	493278	101205	1.5
R5	Residential property at 20 Rowan Way	493384	101214	1.5
R6	Residential property at Shripney Road	494078	101008	1.5
R7	Residential property at Shripney Road	493850	101896	1.5

Seven residential have been assessed to determine the effect of air quality, associated with the proposed development. The locations of the receptor are identified on **Figure 4-3**.

4.5 ECOLOGICAL RECEPTORS

Air quality impacts associated with the proposed re-development have the potential to impact on receptors of ecological sensitivity within the vicinity of the site. The IAQM guidance on 'Air Quality Impacts on Designated Nature Conservation Sites' (2020) outlines the types of designated nature sites within 2 km of the proposed development which require air quality assessment. These are inclusive of;

- Sites of Special Scientific Interest (SSSIs);
- Special Areas of Conservation (SACs);
- Special Protection Areas (SPAs);
- Ramsar Sites;
- Areas of Special Scientific Interest (ASSIs);
- National Nature Reserves (NNRs);
- Local Nature Reserves (LNRs);
- Local Wildlife Sites (LWSs); and,
- Areas of Ancient Woodland (AW).

The Conservation of Habitats and Species Regulations (2019) additionally requires competent authorities to review planning applications and consents that have the potential to impact on European designated sites (e.g. Special Protection Areas).

A study was undertaken to identify any statutory designated sites of ecological or nature conservation importance within the extents of the dispersion modelling assessment. This was completed using the Multi-

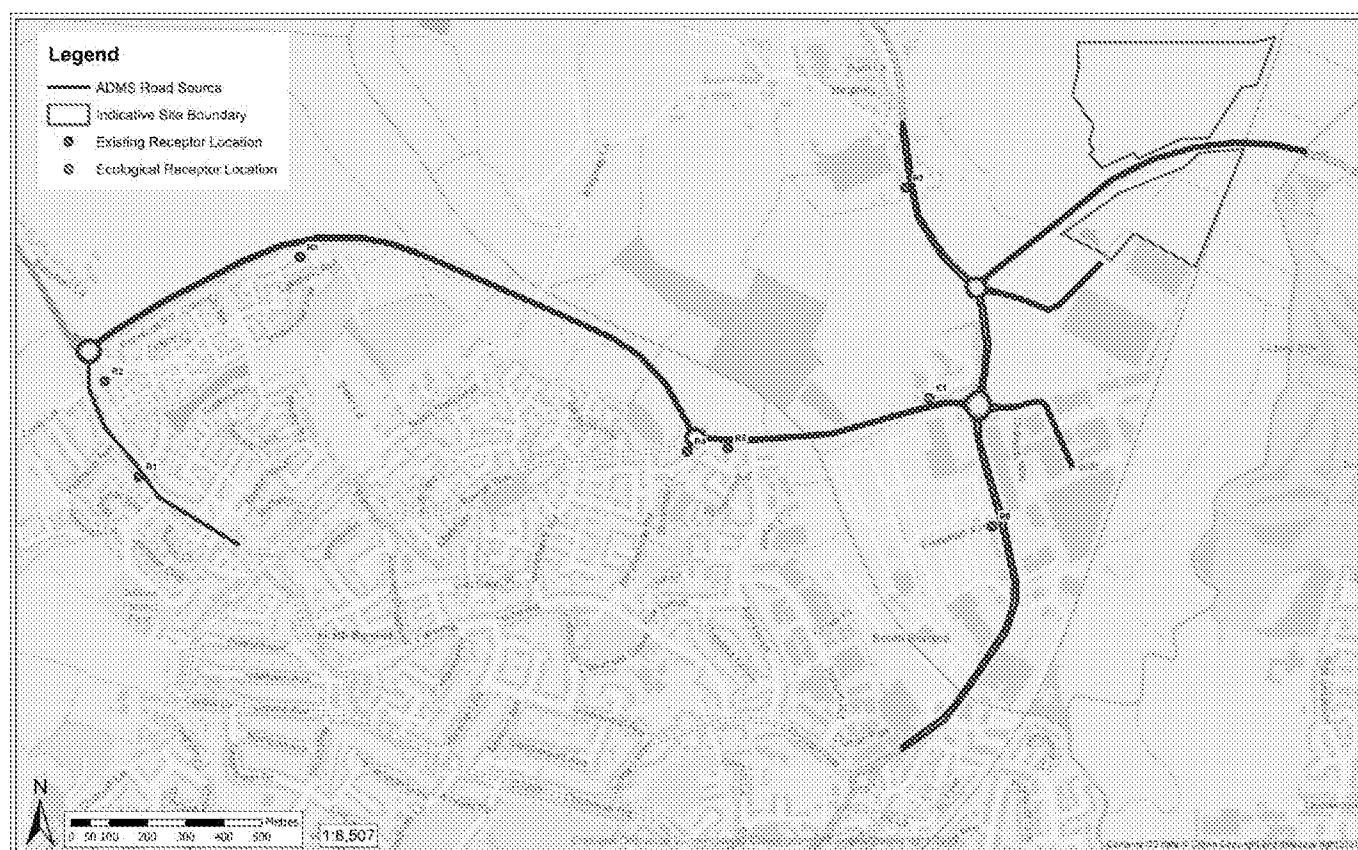
Agency Geographic Information for the Countryside (MAGIC) web-based interactive mapping service, which draws together information on key environmental schemes and designations. Following a search within a 2 km radius of the site boundary, the following ecological receptor was identified:

Table 4-3. Ecological Sensitive Receptor Locations

Site ID	Site	Designation	UK NGR (m)		Distance from Site (km)	Distance from Nearest Affected Road (m)
			X	Y		
E1	The Brooks (LNR)	LNR	493912	101345	0.5	17.2

It should be noted that the IAQM Guidance only requires the assessment of ecological receptors which are located within 200 m of the affected road network. Therefore, this ecological receptor has been assessed.

Figure 4-3. Sensitive Receptor Locations



5.0 ASSESSMENT OF AIR QUALITY IMPACTS - CONSTRUCTION PHASE

5.1 POLLUTANT SOURCES

The main emissions during construction are likely to be dust and particulate matter generated during earth moving (particularly during dry months) or from construction materials. The main potential effects of dust and particulate matter are:

- Visual - dust plume, reduced visibility, coating and soiling of surfaces leading to annoyance, loss of amenity, the need to clean surfaces;
- Physical and/or chemical contamination and corrosion of artefacts;
- Coating of vegetation and soil contamination; and,
- Health effects due to inhalation e.g. asthma or irritation of the eyes.

A number of other factors such as the amount of precipitation and other meteorological conditions will also greatly influence the amount of particulate matter generated.

Construction activities can give rise to short-term elevated dust/PM₁₀ concentrations in neighbouring areas. This may arise from vehicle movements, soiling of the public highway, demolition or windblown stockpiles.

5.2 PARTICULATE MATTER (PM₁₀)

The UK Air Quality Standards seek to control the health implications of respirable PM₁₀. However, the majority of particles released from construction will be greater than this in size.

Construction works on site have the potential to elevate localised PM₁₀ concentrations in the area. On this basis, mitigation measures should still be taken to minimise these emissions as part of good site practice.

5.3 DUST

Particles greater than 10µm are likely to settle out relatively quickly and may cause annoyance due to their soiling capability. Although there are no formal standards or criteria for nuisance caused by deposited particles, the IAQM 'Guidance on Monitoring in the Vicinity of Demolition and Construction Sites' (October 2018) and the Environment Agency Technical Guidance Note (TGN) M17 states that dust is usually compared with a 'complaints likely' guideline of 200mg/m²/day. Therefore, a deposition rate of 200mg/m²/day is often presented as a threshold for serious nuisance though this is usually only applied to long term exposure as people are generally more tolerant of dust for a short or defined period. Significant nuisance is likely when the dust coverage of surfaces is visible in contrast with adjacent clean areas, especially when it happens regularly. Severe dust nuisance occurs when the dust is perceptible without a clean reference surface.

Construction activities have the potential to suspend dust, which could result in annoyance of residents surrounding the site. Measures will be taken to minimise the emissions of dust as part of good site practice.

Recommended mitigation measures proportionate to the risk associated with the development and based on best practice guidance are discussed in the following sections.

5.4 METHODOLOGY

The construction phase assessment utilises the IAQM Guidance on the Assessment of Dust from Demolition and Construction document published in February 2014.

Four construction processes are considered; these are demolition, earthworks, construction and trackout. For each of these phases, the impact description of the potential dust impacts is derived following the determination of a dust emission magnitude and the distance of activities to the nearest sensitive receptor, therefore assessing worst case impacts. A full explanation of the methodology is contained in Appendix A.

5.5 ASSESSMENT RESULTS

Based on the methodology detailed in Appendix A, the scale of the anticipated works has determined the potential dust emission magnitude for each process, as presented in the **Table 5-1** below.

Table 5-1. Dust Emission Magnitude

Construction Process	Site Criteria	Dust Emission Magnitude
Demolition	No demolition required	N/A
Earthworks	Total Site Area: 2,500 to 10,000 m ²	Medium
Construction	Total Building Volume 2,500 to 100,000 m ³	Medium
Trackout	Assumed 10 - 50 HDV outward movements in any one day	Medium

The sensitivity of the surrounding area to each construction process has been determined following stage 2B of the IAQM guidance. The assessment has determined the area sensitivities as shown in the **Table 5-2**.

The sensitivity of the ecological receptors is considered not applicable within the construction phase assessment due to the distance from the application site which is greater than 500m. This is in accordance with Table 4 of the IAQM Guidance.

Table 5-2. Sensitivity of the Area

Source	Area Sensitivity					
	Dust Soiling	Site Sensitivity Criteria	Health Effects of PM ₁₀	Site Sensitivity Criteria	Ecological	Site Sensitivity Criteria
Demolition	N/A	No demolition required	N/A	No demolition required	N/A	No demolition required
Earthworks	Medium	10-100 Highly Sensitive Receptors within 50m	Low	Annual Mean of <24 ug/m ³ for PM ₁₀	N/A	>50 m from site boundary
Construction	Medium		Low	10-100 Highly Sensitive Receptors within 50m	N/A	
Trackout	Medium	10-100 Highly Sensitive Receptors within 50m of roads within 500m of site	Low	Annual Mean of <24 ug/m ³ for PM ₁₀ 10-100 Highly Sensitive Receptors within 50m of roads within 500m of site	N/A	>50 m from roads within 500 m from site boundary

The dust emission magnitude determined in **Table 5-1** has been combined with the sensitivity of the area determined in **Table 5-2**, to determine the risk of impacts prior to the implementation of appropriate mitigation measures. The potential impact significance of dust emissions associated with the development, without mitigation, is presented in **Table 5-3**.

Table 5-3. Impact Description of Construction Activities without Mitigation

Source	Summary Risk of Impacts Prior to Mitigation		
	Dust Soiling	Health Effects of PM ₁₀	Ecological
Demolition	N/A	N/A	N/A
Earthworks	Medium	Low	N/A
Construction	Medium	Low	N/A
Trackout	Low	Low	N/A

Appropriate mitigation measures are detailed and presented in Section 7. Following the adoption of these measures, the subsequent impact significance of the construction phase is not predicted to be significant.

6.0 ASSESSMENT OF AIR QUALITY IMPACTS - OPERATIONAL PHASE

In the context of the proposed development, road traffic is identified as the dominant emission source that is likely to cause potential risk of exposure of air pollutants at receptors.

The operational phase assessment therefore consists of the quantified predictions of the change in NO₂, PM₁₀ and PM_{2.5} for the operational phase of the development due to changes in traffic movement. Predictions of air quality at the site have been undertaken for the operational phase of the development using ADMS Roads.

In accordance with the provided traffic data, the operational phase assessment has been undertaken with an assumed operational opening year of 2022. The assessment scenarios are therefore:

- 2019 Baseline = Existing Baseline Conditions (2019);
- 2022 “Do Minimum” = Baseline Conditions + Committed Development Flows (through local growth factor); and,
- 2022 “Do Something” = Baseline Conditions + Cumulative Development (through local growth factor) + Proposed Development.

6.1 EXISTING AND PREDICTED TRAFFIC FLOWS

Baseline 2019 traffic data, projected 2022 ‘Do Minimum’ and ‘Do Something’ traffic data, and average vehicle speeds have been obtained for the operational phase assessment in the form of Annual Average Daily Traffic figures (AADT). Development traffic flows have been provided by Vectos except for traffic data in North Bersted Bypass and B2259. These links have been used to verify the model.

Baseline 2019 traffic data was downloaded from the Department for Transport (DfT) website.

The proposed development opening year is assumed to be a worst-case year of 2022. To determine the traffic flows for the 2022 ‘Do Minimum’ traffic flows, a TEMPro factor of 1.0475 has been applied to the 2019 Baseline traffic data. For A29 North and B2259, a TEMPro factor of 1.0614 and 1.0444 has been applied to the 2015 and 2016 Baseline traffic data respectively.

Predicted development flows have been combined with 2022 ‘Do Minimum’ traffic flows to determine the ‘Do Something’ 2022 scenario traffic flows. Development traffic flows were provided by Vectos.

Emission factors for the 2019 baseline and 2022 projected ‘Do Minimum’ and ‘Do Something’ scenarios have been calculated using the Emission Factor Toolkit (EFT) Version 10.1 (August 2020).

It is assumed the average vehicle speeds on the local road network in an opening year of 2022 will be broadly the same as the ones in 2019. A 50 m 20 km/hr slow down phase is included on each link at every junction and roundabout within the assessment. All of the roads within the dispersion model are illustrated in **Figure A-1**. Detailed traffic figures are provided in the **Table 6-1**.

Table 6-1. Traffic Data

Link	Speed (km/h)	2019 Baseline		2022 Do Minimum		2022 Do Something	
		AADT	HGV %	AADT	%HGV	AADT	%HGV
A29 North Northbound	64	12767	3.39	13373	3.39	13635	3.36
A29 North Southbound	64	12216	2.43	12796	2.43	13059	2.41
A259 BNRR Eastbound	80	7517	2.64	7874	2.64	8210	2.66
A259 BNRR Westbound	80	7517	2.64	7874	2.64	8210	2.66
Site Access Road Eastbound	32	1803	3.00	1889	3.00	2878	3.00
Site Access Road Westbound	32	2055	3.00	2153	3.00	3142	3.00
A29 South Southbound	64	13996	2.50	14660	2.50	15051	2.53
A29 South Northbound	64	13996	2.50	14660	2.50	15051	2.53
Steyning Way Eastbound	48	2512	3.00	2632	3.00	2632	3.00
Steyning Way Westbound	48	3342	3.00	3500	3.00	3500	3.00
A29 South Southbound	64	10463	0.95	10959	0.95	11129	0.97
A29 South Northbound	64	10463	0.95	10959	0.95	11129	0.97
A259 Rowan Way Westbound	64	6454	4.41	6760	4.41	6981	4.39
A259 Rowan Way Eastbound	64	6454	4.41	6760	4.41	6981	4.39
N Bersted Bypass Westbound	80	6454	4.41	6760	4.41	6760	4.41
N Bersted Bypass Eastbound	80	6454	4.41	6760	4.41	6760	4.41
B2259	48	14203	3.05	14877	3.05	14877	3.05

6.2 BACKGROUND CONCENTRATIONS

The use of background concentrations within the modelling process ensures that pollutant sources other than traffic are represented appropriately. Background sources of pollutants include industrial, domestic and rail emissions within the vicinity of the study site. Several sources have been used to obtain representative background levels as discussed below.

The background concentrations used within the assessment have been determined with reference to the IAQM Guidance and Technical Guidance (TG) (16).

The IAQM Guidance states:

“A matter of judgement should take into account the background and future background air quality and whether it is likely to approach or exceed the value of the AQO.”

Additionally, TG (16) states:

“Typically, only the process contributions from local sources are represented within an output by the dispersion model. In these circumstances, it is necessary to add an appropriate background concentration(s) to the modelled source contributions to derive the total pollutant concentrations.”

Defra Published Background Concentrations for 2019

The background concentrations shown in **Table 6-2** were referenced from the UK National Air Quality Information Archive database based on the National Grid Co-ordinates of 1 x 1 km grid squares nearest to the application site. In May 2019, Defra issued revised 2018 based background maps for nitrogen oxide (NO_x), NO₂, PM₁₀ and PM_{2.5}.

Table 6-2. Published Background Air Quality Levels ($\mu\text{g}/\text{m}^3$)

Receptor Location		2019			
		NO _x	NO ₂	PM ₁₀	PM _{2.5}
Proposed Site					
X Coordinate	Y Coordinate	14.10	10.66	14.12	9.29
Local Authority Monitoring					
Bog12		13.90	10.52	15.13	9.96
Bog18		11.66	8.96	14.53	9.26
Existing Sensitive Receptors					
R1		11.66	8.96	14.53	9.26
R2		11.66	8.96	14.53	9.26
R3		12.13	9.29	14.53	9.56
R4		13.90	10.52	15.13	9.96
R5		13.90	10.52	15.13	9.96
R6		14.10	10.66	14.12	9.29
R7		13.90	10.52	15.13	9.96
Ecological Sensitive Receptors					
E1		13.90	10.52	15.13	9.96

All the Defra background concentrations detailed in **Table 6-2** for 2019, show that the background levels are predicted to be below the relevant AQO within the study area.

A breakdown of the background source apportionment of NO_x concentrations at each monitoring location and receptor is shown in **Table 6-3**.

Table 6-3. Pollutant Source Apportionment of NO_x ($\mu\text{g}/\text{m}^3$)

Receptor Location	2019						
	Total NO _x	% of NO _x from Road Sources	% of NO _x from Industrial Sources	% of NO _x from Domestic Sources	% of NO _x from Aircraft Sources	% of NO _x from Rail Sources	% of NO _x from Other Sources
Local Authority Monitoring							
Bog12	13.90	21.26	13.84	6.76	0.00	0.05	58.10
Bog18	11.66	22.65	5.94	5.59	0.00	0.03	65.78
Existing Sensitive Receptors							
R1	11.66	22.65	5.94	5.59	0.00	0.03	65.78
R2	11.66	22.65	5.94	5.59	0.00	0.03	65.78
R3	12.13	22.39	6.02	7.98	0.00	0.04	63.57
R4	13.90	21.26	13.84	6.76	0.00	0.05	58.10
R5	13.90	21.26	13.84	6.76	0.00	0.05	58.10
R6	14.10	23.75	7.79	6.02	0.00	0.14	62.30
R7	13.90	21.26	13.84	6.76	0.00	0.05	58.10
Ecological Sensitive Receptors							
E1	13.90	21.26	13.84	6.76	0.00	0.05	58.10

Table 6-3 shows that the major background source of NO_x at the monitoring, sensitive receptor locations where sources have been identified are mainly comprised of road sources.

A review of the Defra background site has determined that they are in line with the Local Authority monitoring within ADC.

Table 6-4 shows the background concentrations utilised within the assessment.

Table 6-4. Utilised Background Concentrations ($\mu\text{g}/\text{m}^3$)

Receptor Location	2019		Source
	NO _x	NO ₂	
Local Authority Monitoring			
Bog12	13.90	10.52	Defra Background Maps
Bog18	11.66	8.96	
Existing Sensitive Receptors			
R1	11.66	8.96	Defra Background Maps
R2	11.66	8.96	
R3	12.13	9.29	
R4	13.90	10.52	
R5	13.90	10.52	
R6	14.10	10.66	
R7	13.90	10.52	
Ecological Sensitive Receptors			
E1	15.25	-	APIS

6.3 MODEL VERIFICATION

Model verification involves the comparison of modelled data to monitored data in order to gain the best possible representation of current pollutant concentrations for the assessment years. The verification process is in general accordance with that contained in Section 7 of the TG16 guidance note and uses the most recently available diffusion tube monitoring data to best represent this.

The verification process consists of using the monitoring data and the published background air quality data in the UK National Air Quality Information Archive to calculate the road traffic contribution of NO_x at the monitoring locations. Outputs from the ADMS Roads model are provided as predicted road traffic contribution NO_x emissions. These are converted into predicted roadside contribution NO₂ exposure at the relevant receptor locations based on the updated approach to deriving NO₂ from NO_x for road traffic sources published in Local Air Quality Management TG16. The calculation was derived using the NO_x to NO₂ worksheet in the online LAQM tools website hosted by Defra. **Table 6-5** summarises the final model/monitored data correlation following the application of the model correction factor.

Table 6-5. Comparison of Roadside Modelling & Monitoring Results for NO₂

Link	NO ₂ $\mu\text{g}/\text{m}^3$		
	Monitored NO ₂	Modelled NO ₂	Difference (%)
Bog12	26.00	26.00	-0.01
Bog18	18.00	18.01	0.03

The final model produced data at the monitoring locations to within 10% of the monitoring results at all of the verification points, as recommended by TG16 guidance.

The final verification model correlation coefficient (representing the model uncertainty) is 1.00. This was achieved by applying a model correction factor of 3.04 to roadside predicted NO_x concentrations before converting to NO₂. This figure demonstrates that the model predictions were in line with the road traffic emissions at the monitoring locations.

6.4 BACKGROUND CONCENTRATIONS

Table 6-6. Summary of ADMS Roads Model Inputs

Parameter	Description	Input Value
Chemistry	A facility within ADMS-Roads to calculate the chemical reactions in the atmosphere between Nitric Oxide (NO), NO ₂ , Ozone (O ₃) and Volatile organic compounds (VOCs).	No atmospheric chemistry parameters included
Meteorology	Representative meteorological data from a local source	Thorney Island 2019 Meteorological Station , hourly sequential data
Surface Roughness	A setting to define the surface roughness of the model area based upon its location.	0.5m representing a typical surface roughness for Parkland/Open Suburbia was used for the Site 0.3m representing a typical surface roughness for Agricultural Areas for the met. Measurement site.
Latitude	Allows the location of the model area to be set	United Kingdom = 50
Monin-Obukhov Length	This allows a measure of the stability of the atmosphere within the model area to be specified depending upon its character.	Small Towns = 10m was used for the Site and met. Measurement site.
Elevation of Road	Allows the height of the road link above ground level to be specified.	All other road links were set at ground level = 0m .
Road Width	Allows the width of the road link to be specified.	Road width used depended on data obtained from OS map data for the specific road link
Topography	This enables complex terrain data to be included within the model in order to account for turbulence and plume spread effects of topography	No topographical information used
Time Varied Emissions	This enables daily, weekly or monthly variations in emissions to be applied to road sources	No time varied emissions used
Road Type	Allows the effect of different types of roads to be assessed.	Urban (Not London) settings were used for the relevant links
Road Speeds	Enables individual road speeds to be added for each road link	Based on national speed limits
Canyon Height	Allows the model to take account turbulent flow patterns occurring inside a street with relatively tall buildings on both sides, known as a "street canyon".	No canyons used within the model
Road Source Emissions	Road source emission rates are calculated from traffic flow data using the in-built EFT database of traffic emission factors.	The EFT Version 10.1 (2020) dataset was used.
Year	Predicted EFT emissions rates depend on the year of emission.	2019 data for verification and baseline Operational Phase Assessment. 2022 data for the Operational Phase Traffic Assessment. 2022 data for the Operational Phase Assessment, using 2019 EFT.

6.5 ADMS MODELLING RESULTS

6.5.1 Traffic Assessment

The ADMS Model has predicted concentrations of NO₂, PM₁₀ and PM_{2.5} at relevant receptor locations adjacent to roads likely to be affected by the development, as summarised in the following tables. Only receptors close to roads where there is predicted to be a change in emissions have been assessed.

6.5.2 Assessment Scenarios

For the operational year of 2022, assessment of the effects of emissions from the proposed traffic associated with the scheme, has been undertaken using the Emissions Factor Toolkit (EFT) 2022 emissions rates which take into account of the rate of reduction in emission from road vehicles into the future with the following factors:

- 2019 Baseline = Existing Baseline conditions;
- 2022 “Do Minimum” = 2022 Baseline + Committed Development Flows (through local growth factor); and,
- 2022 “Do Something” = 2022 Baseline + Committed Development Flows (through local growth factor) + Development Traffic Flows.

Additionally, a sensitivity, theoretical, test has been undertaken in Appendix C assuming no improvements in vehicle emissions between the baseline year of 2019 and the opening year of 2022.

6.5.3 Long-Term Operational Traffic Assessment

Nitrogen Dioxide

Table 6-7 presents a summary of the predicted change in NO₂ concentrations at relevant receptor locations, due to changes in traffic flow associated with the proposed development, based on modelled ‘Do Minimum’ and ‘Do Something’ scenarios.

Table 6-7. Predicted Annual Average Concentrations of NO₂ at Receptor Locations

Receptor		NO ₂ (µg/m ³)			
		2019 Baseline	2022 Do Minimum	2022 Do Something	Development Contribution
R1	Residential property at 432 Chichester Road	21.89	19.08	19.08	<0.01
R2	Residential property at 27 Chichester Road	18.09	15.98	15.98	<0.01
R3	Residential property at 28 Crossfields	15.36	13.94	13.94	<0.01
R4	Residential property at 23 Stoneage Close	20.35	18.00	18.19	0.19
R5	Residential property at 20 Rowan Way	21.89	19.26	19.51	0.25
R6	Residential property at Shripney Road	21.07	18.92	19.08	0.16
R7	Residential property at Shripney Road	25.87	22.59	22.82	0.23
Annual Mean AQO		40 µg/m ³			

All modelled existing receptors are predicted to be below the AQO for NO₂ in both the ‘Do Minimum’ and ‘Do Something’ scenarios.

As indicated in **Table 6-7**, the maximum predicted increase in annual average exposure to NO₂ at any existing receptor, due to changes in traffic movements associated with the proposed development is likely to be 0.25 µg/m³ at Residential property at 20 Rowan Way (R5).

The predicted long-term NO₂ concentrations at all existing receptors are well below 60 µg/m³ in all scenarios. Therefore, it is unlikely there will be any exceedances for the short-term NO₂ AQO at all modelled receptors as outlined in LAQM TG16 technical guidance.

Figure 6-1 and **Figure 6-2** below illustrate the Total Long Term Annual Average Nitrogen Dioxide (NO₂) Contribution and Concentration at the Proposed Development (µg/m³).

Figure 6-1. Annual Average Long-Term Nitrogen Dioxide (NO₂) Contribution from Proposed Development (µg/m³)

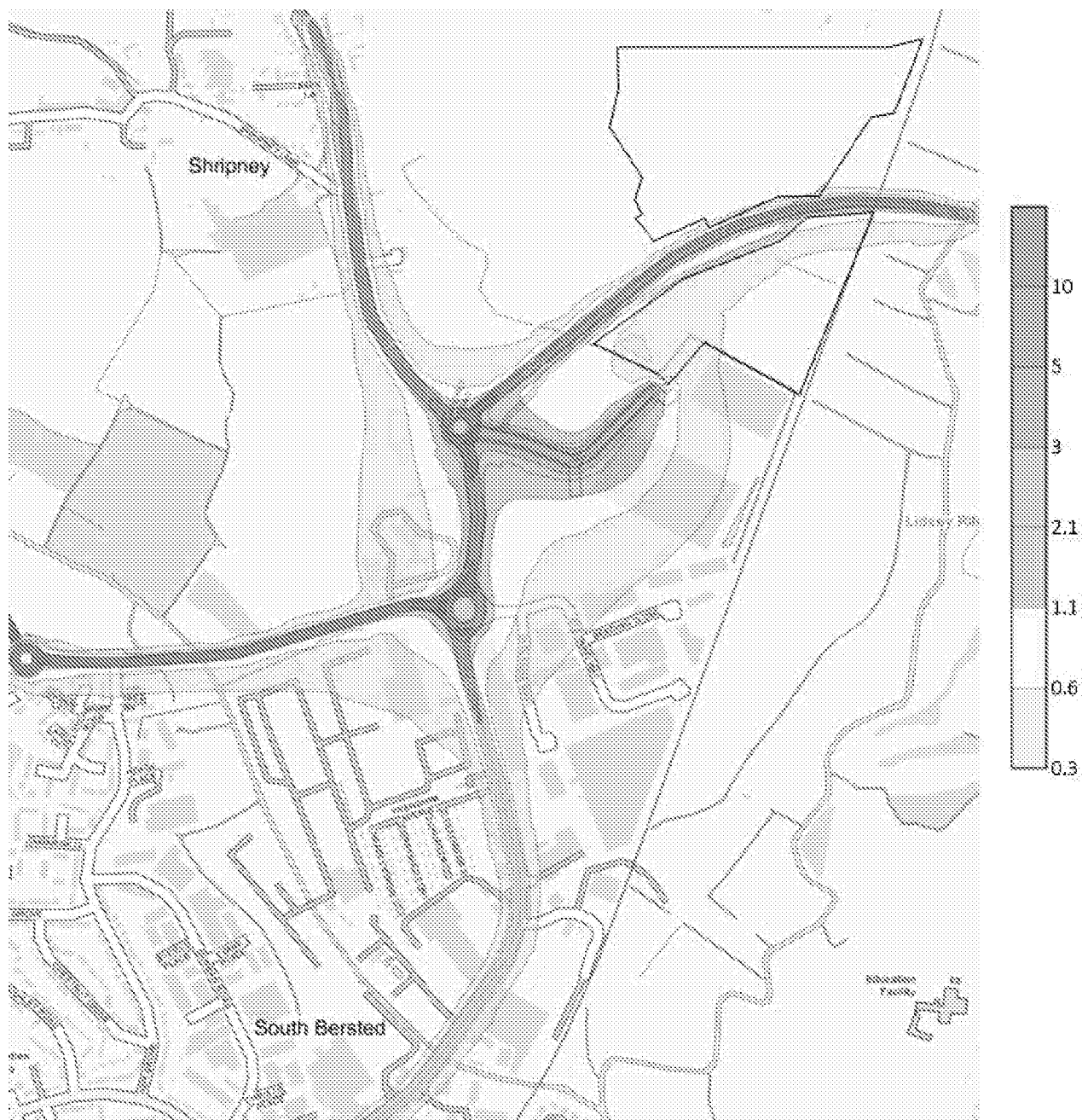


Figure 6-2. Total Long Term Annual Average Nitrogen Dioxide (NO₂) Concentration at Proposed Development (µg/m³)



The impact description of changes in traffic flow associated with the proposed development with respect to annual mean NO₂ exposure has been assessed with reference to the criteria in Section 3. The outcomes of the assessment are summarised in **Table 6-8**.

Table 6-8. Impact Description of Effects at Key Receptors (NO₂)

Impact Description of NO ₂ Effects at Key Receptors					
Receptor	Change Due to Development (DS-DM) (µg/m ³)	Change due to Development (% of AQO)	% Change in Concentration Relative to AQO	% Annual Mean Concentration in Assessment Year	Impact Description
R1	<0.01	<0.01	0%	≤75% of AQO	Negligible
R2	<0.01	<0.01	0%	≤75% of AQO	Negligible
R3	<0.01	<0.01	0%	≤75% of AQO	Negligible
R4	0.19	0.48	0%	≤75% of AQO	Negligible
R5	0.25	0.63	1%	≤75% of AQO	Negligible
R6	0.16	0.40	0%	≤75% of AQO	Negligible
R7	0.23	0.58	1%	≤75% of AQO	Negligible

+0% means a change of <0.5% as per explanatory note 2 of table 6.3 of the EPUK IAQM Guidance.

The impact description of the effects of changes in traffic flow as a result of the proposed development, with respect to NO₂ exposure for existing receptors, is determined to be 'negligible' at all modelled receptors. This is based on the methodology outlined in section 3. Given the quantitative nature of the assessment and the verification of the air quality dispersion model, the confidence of the assessment is deemed to be 'high'.

Particulate Matter (PM₁₀)

Table 6-9 presents a summary of the predicted change in annual mean PM₁₀ concentrations at relevant receptor locations, due to changes in traffic flow associated with the proposed development, based on modelled 'Do Minimum' and 'Do Something' scenarios.

Table 6-9. Predicted Annual Average Concentrations of PM₁₀ at Receptor Locations

Receptor		PM ₁₀ (µg/m ³)			
		2019 Baseline	2022 Do Minimum	2022 Do Something	Development Contribution
R1	Residential property at 432 Chichester Road	16.04	16.02	16.02	<0.01
R2	Residential property at 27 Chichester Road	15.43	15.41	15.41	<0.01
R3	Residential property at 28 Crossfields	15.28	15.26	15.26	<0.01
R4	Residential property at 23 Stoneage Close	16.06	16.03	16.05	0.02
R5	Residential property at 20 Rowan Way	16.41	16.38	16.42	0.04
R6	Residential property at Shripney Road	15.39	15.38	15.40	0.02
R7	Residential property at Shripney Road	17.09	17.07	17.11	0.04
Annual Mean AQO		40 µg/m ³			

All modelled existing receptors are predicted to be below the AQO for PM₁₀ in both the 'Do Minimum' and 'Do Something' scenarios.

As indicated in **Table 6-9**, the maximum predicted increase in annual average exposure to PM₁₀ at any existing receptor, due to changes in traffic movements associated with the proposed development is 0.04 µg/m³ at Residential property at 20 Rowan Way (R5).

The impact description of changes in traffic flow associated with the proposed development with respect to annual mean PM₁₀ exposure has been assessed with reference to the criteria in Section 3. The outcomes of the assessment are summarised in **Table 6-10**.

Table 6-10. Impact Description of Effects at Key Receptors (PM₁₀)

Impact Description of PM ₁₀ Effects at Key Receptors					
Receptor	Change Due to Development (DS-DM) (µg/m ³)	Change due to Development (% of AQO)	% Change in Concentration Relative to AQO	% Annual Mean Concentration in Assessment Year	Impact Description
R1	<0.01	<0.01	0%	≤75% of AQO	Negligible
R2	<0.01	<0.01	0%	≤75% of AQO	Negligible
R3	<0.01	<0.01	0%	≤75% of AQO	Negligible
R4	0.02	0.06	0%	≤75% of AQO	Negligible
R5	0.04	0.09	0%	≤75% of AQO	Negligible
R6	0.02	0.06	0%	≤75% of AQO	Negligible
R7	0.04	0.09	0%	≤75% of AQO	Negligible

+0% means a change of <0.5% as per explanatory note 2 of table 6.3 of the EPUK IAQM Guidance.

The impact description of the effects of changes in traffic as a result of the proposed development, with respect to annual mean PM₁₀ exposure for existing receptors is determined to be 'negligible' based on the methodology outlined in section 3. Given the quantitative nature of the assessment and the verification of the air quality dispersion model, the confidence of the assessment is deemed to be 'high'.

Particulate Matter (PM_{2.5})

Table 6-11 presents a summary of the predicted change in annual mean PM_{2.5} concentrations at relevant receptor locations, due to changes in traffic flow associated with the proposed development, based on modelled 'Do Minimum' and 'Do Something' scenarios.

Table 6-11. Predicted Annual Average Concentrations of PM_{2.5} at Receptor Locations

Receptor		PM _{2.5} (µg/m ³)			
		2019 Baseline	2022 Do Minimum	2022 Do Something	Development Contribution
R1	Residential property at 432 Chichester Road	11.86	11.91	11.91	<0.01
R2	Residential property at 27 Chichester Road	10.79	10.80	10.80	<0.01
R3	Residential property at 28 Crossfields	10.85	10.87	10.87	<0.01
R4	Residential property at 23 Stoneage Close	11.53	11.53	11.57	0.04
R5	Residential property at 20 Rowan Way	12.16	12.18	12.25	0.06
R6	Residential property at Shripney Road	11.49	11.53	11.57	0.04
R7	Residential property at Shripney Road	13.36	13.42	13.49	0.07
Annual Mean AQO		25 µg/m ³			

All modelled existing receptors are predicted to be below the AQO for PM_{2.5} in both the 'Do Minimum' and 'Do Something' scenarios.

As indicated in **Table 6-11**, the maximum predicted increase in annual average exposure to PM_{2.5} at any existing receptor, due to changes in traffic movements associated with the proposed development is 0.06 µg/m³ at Residential property at 20 Rowan Way (R5).

The impact description of changes in traffic flow associated with the proposed development with respect to annual mean PM₁₀ exposure has been assessed with reference to the criteria in Section 3. The outcomes of the assessment are summarised in **Table 6-12**.

Table 6-12. Impact Description of Effects at Key Receptors (PM_{2.5})

Impact Description of PM _{2.5} Effects at Key Receptors					
Receptor	Change Due to Development (DS-DM) (µg/m ³)	Change due to Development (% of AQO)	% Change in Concentration Relative to AQO	% Annual Mean Concentration in Assessment Year	Impact Description
R1	<0.01	<0.01	0%	≤75% of AQO	Negligible
R2	<0.01	<0.01	0%	≤75% of AQO	Negligible
R3	<0.01	<0.01	0%	≤75% of AQO	Negligible
R4	0.04	0.15	0%	≤75% of AQO	Negligible
R5	0.06	0.26	0%	≤75% of AQO	Negligible
R6	0.04	0.17	0%	≤75% of AQO	Negligible
R7	0.07	0.27	0%	≤75% of AQO	Negligible

+0% means a change of <0.5% as per explanatory note 2 of table 6.3 of the EPUK IAQM Guidance.

The impact description of the effects of changes in traffic as a result of the proposed development, with respect to annual mean PM₁₀ exposure for existing receptors is determined to be 'negligible' based on the methodology outlined in section 3. Given the quantitative nature of the assessment and the verification of the air quality dispersion model, the confidence of the assessment is deemed to be 'high'.

6.5.4 Ecological Sensitive Receptor Locations

Background concentrations at each of the ecologically sensitive sites were determined through a review of the NO_x pollutants published on the APIS website.

The below assessment has been undertaken in accordance with A Guide to the Assessment of Air Quality Impacts in Designated Nature Conservation Sites (IAQM, 2020).

Nitrogen Oxide

Table 6-13 presents a summary of the predicted change in NO_x concentrations at relevant receptor locations, due to changes in traffic flow associated with the development, based on modelled 'Do Minimum' and 'Do Something' scenarios.

Table 6-13. Predicted Annual Average Concentrations of NO_x at Ecological Receptor Locations

Ecological Receptor		Predicted Maximum Annual Mean Concentration (µg/m ³)				
		Do Minimum 2022 NO _x	Do Something 2022 NO _x	Process Contribution (PC)	PC as %age of AQO	Background
E1	The Brooks (LNR)	27.73	28.17	0.4	1	15.25
Annual Mean AQO/Critical Level (CL)		30 µg/m ³				

As indicated in **Table 6-13**, the maximum predicted increase in the annual average exposure to NO_x at any ecological receptor, due to changes in traffic movements associated with the development, is 0.4 µg/m³ at The Brooks (E1) .

Section 5.5.4.1 of *A Guide to the Assessment of Air Quality Impacts in Designated Nature Conservation Sites*, IAQM 2020 states:

Where the assessment indicates that changes in annual mean NO_x concentrations within a designated site cannot be dismissed as imperceptible (i.e. an increase of over 0.4 µg/m³) and the NO_x critical level is exceeded, then changes in nutrient nitrogen deposition should be calculated as supporting information to further assist in the evaluation of significance.

The maximum predicted increase in the annual average exposure to NO_x at the identified ecological receptor, due to changes in traffic movements associated with the development, is 0.4 µg/m³ at The Brooks (E1) which is equal the 0.40 µg/m³ development contribution stated within the guidance of '*A Guide to the Assessment of Air Quality Impacts in Designated Nature Conservation Sites*', IAQM 2020.

As the NO_x contribution at E1 (The Brook, LNR) is 0.4 µg/m³, a full nitrogen deposition assessment has been undertaken below.

6.5.5 Nitrogen Deposition

The dry deposition calculation has used the spreadsheet provided by the Air Quality Modelling and Assessment Unit (AQMAU). These calculations take the predicted maximum annual concentration (µg/m³) and use an assumed deposition velocity to estimate deposition concentration in kgN/ha/year or keq/ha/year. The available deposition velocity is 0.14 for grasslands or similar habitats, in accordance with in LA 105 (published November 2019). The calculated total nitrogen depositions at the ecological receptors are presented in **Table 6-14**. The calculated nitrogen deposition was compared to the available critical load of nitrogen deposition.

Table 6-14. The Predicted Total PC Nitrogen Deposition

Ecological Receptor	Long-Term PC of NO _x (µg/m ³)	Dry PC Nitrogen Deposition (kgN/ha/year)	Background	Total PC Nitrogen Deposition (kgN/ha/year)	Critical load (CL) (kgN/ha/year)	PC as %age of CL
E1	0.4	0.06	15.25	15.31	10 - 20	0.3 - 0.6

Critical Load Function Tool

Calculating exceedance of an acidity critical load function, or the impact description of a contribution from a source is complex. Critical Load Function Tool has been used to calculate the exceedance (<http://www.apis.ac.uk/critical-load-function-tool>). It enables the comparison of acid deposition to the critical load function to help make a decision on the impact description of a process contribution.

The Brooks (LNR)

The results of exceedance and deposition as a proportion of the critical level (CL) function for E1, are presented both in Figure 2 and in **Table 6-15**. The following data has been used in the calculations.

Background deposition: 1.92 (N: 1.81 |S: 0.17) (keq/ha/yr).

CLmax S: 10.915 CLminN: 0.357 CLMaxN: 11.272 (keq/ha/yr)

Nitrogen PC deposition: = $0.44 \times 0.14 = 0.06$ kqN/ha/yr

Table 6-15. Exceedance and deposition as a proportion of the CL Function at E1

Source	Exceedance (keq/ha/year)	% of CL function
Process Contribution (PC)	No exceedance of CL function	0.5
Background	No exceedance of CL function	17.6
Predicted Environmental Concentration (PEC)	No exceedance of CL function	18.1

The maximum predicted total acid deposition PC at receptor E1 is 0.06 keqN/ha/yr, which is 'no exceedance of CL function' and 0.5 % of CL function. It can be concluded that the impact of nitrogen depositions from the road at E1 are negligible.

7.0 MITIGATION

7.1 CONSTRUCTION PHASE

The dust risk categories have been determined in Section 5 for each of the four construction activities. The assessment has determined that the potential impact description of dust emissions associated with the construction phase of the proposed development is 'medium risk' at the worst affected receptors.

Using the methodology described in Appendix A, appropriate site-specific mitigation measures associated with the determined level of risk can be found in Section 8.2 of the 'IAQM Guidance on the Assessment of Dust from Demolition and Construction'.

The mitigation measures have been divided into general measures applicable to all sites and measures applicable specifically to demolition, earthworks, construction and trackout. They are categorised into 'highly recommended' and 'desirable' measures.

The mitigation measures for the proposed development are detailed in **Table 7-1** and **Table 7-2**.

Table 7-1. Highly Recommended Mitigation Measures

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
Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority. The level of detail will depend on the risk and should include as a minimum the highly recommended measures in this document. The desirable measures should be included as appropriate for the site. The DMP may include monitoring of dust deposition, dust flux, real time PM ₁₀ continuous monitoring and/or visual inspections.
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 offsite, and the action taken to resolve the situation in the logbook.
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.
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 extensive period.
Avoid site runoff of water or mud.
Keep site fencing, barriers and scaffolding clean using wet methods.
Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below.
Cover, seed or fence stockpiles to prevent wind whipping.
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.
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.

Avoid bonfires and burning of waste materials.

Earthworks

No Action Required.

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.

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.

Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.

Record all inspections of haul routes and any subsequent action in a site logbook.

Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.

Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).

Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.

Access gates to be located at least 10m from receptors where possible.

Table 7-2. Desirable Mitigation Measures

Communications

No Action Required.

Dust Management

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 windowsills within 100m of site boundary, with cleaning to be provided if necessary.

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 power materials ensure bags are sealed after use and stored appropriately to prevent dust.

Trackout

No Action Required.

Following the implementation of the mitigation measures detailed in the tables above, the impact description of the construction phase is not considered to be significant.

8.0 CONCLUSIONS

This report presents the findings of an air quality assessment to accompany an application for the erection of a warehouse (Use Class B8) with ancillary office, associated vehicle parking, van storage, plant, ancillary structures, lighting, landscaping and infrastructure works including earthworks to facilitate flood compensation area at land at Oldlands Farm, Newlands Road, Bognor Regis.

Construction Phase

Prior to the implementation of appropriate mitigation measures, the potential impact description of dust emissions associated with the construction phase of the proposed development is 'medium risk' at the worst affected receptors without mitigation. However, appropriate site-specific mitigation measures have been recommended based on Section 8.2 of the IAQM Guidance on the Assessment of Dust from Demolition, Earthworks, Construction and Trackout. It is anticipated that with these appropriate mitigation measures in place, the risk of adverse effects due to dust emissions from the construction phase will not be significant.

Operational Assessment

The 2022 assessment of the effect of emissions from traffic associated with the scheme, has determined that the maximum predicted increase in the annual average exposure to NO₂ at any existing receptor is likely to be 0.25 µg/m³ at Residential property at 20 Rowan Way (R5).

For PM₁₀, the maximum predicted increase in the annual average exposure is likely to be 0.04 µg/m³ at Residential property at 20 Rowan Way (R5). For PM_{2.5}, the maximum predicted increase in the annual average exposure is likely to be 0.06 µg/m³ at Residential property at 20 Rowan Way (R5).

The impact description of the effects of changes in traffic flow as a result of the proposed development, with respect to NO₂, PM₁₀ and PM_{2.5} exposure, is determined to be 'negligible' at all existing receptors.

Operational Assessment – Ecology

The maximum predicted increase in the annual average exposure to NO_x at the identified ecological receptor, due to changes in traffic movements associated with the development, is 0.4 µg/m³ at The Brooks (E1) which is equal the 0.40 µg/m³ development contribution stated within the guidance of '*A Guide to the Assessment of Air Quality Impacts in Designated Nature Conservation Sites*', IAQM 2020.

A full nitrogen deposition assessment was undertaken for ecological receptor E1. There were no predicted significant impacts on nitrogen deposition at E1 as a result of the proposed development.

Given the quantitative nature of the assessment and the verification of the air quality dispersion model, the confidence of the assessment is deemed to be 'high'.

In conclusion, the development is not considered to be contrary to any of the national and local planning policies regarding air quality.

APPENDIX A - FIGURES

Figure A-1 Air Quality Assessment Area



APPENDIX B - CONSTRUCTION PHASE ASSESSMENT METHODOLOGY

The following information sets out the adopted approach to the construction phase impact assessment in accordance with the aforementioned IAQM guidance¹.

Step 1 – Screen the Requirement for a more Detailed Assessment

An assessment is required if there are sensitive receptors within 350m of the site boundary, within 50m of the route(s) used by construction vehicles on the surrounding road network, or within 500m from the site entrance. A detailed assessment is also required if there is an ecological receptor within 50m of the site boundary.

Step 2A – Define the Potential Dust Emission Magnitude

Demolition

The dust emission magnitude for the demolition phase has been determined based on the below criteria:

- *Large:* Total building volume >50 000m³, potentially dusty construction (e.g. concrete), on-site crushing and screening, demolition activities >20m above ground level;
- *Medium:* Total building volume 20 000m³ – 50 000m³, potentially dusty construction material, demolition activities 10-20m above ground level; and,
- *Small:* Total building volume <20 000m³, construction material with low potential for dust release (e.g. metal cladding or timber), demolition activities <10m above ground, demolition during wetter months.

Earthworks

The dust emission magnitude for the planned earthworks has been determined based on the below criteria:

- *Large:* Total site area >10 000m², potentially dusty soil type (e.g. clay, which will be prone to suspension when dry due to small particle size), > 10 heavy earth moving vehicles active at any one time, formation of bunds >8m in height, total material moved >100 000 tonnes;
- *Medium:* Total site area 2 500m² – 10 000m², moderately dusty soil type (e.g. silt), 5-10 heavy earth moving vehicles active at any one time, formation of bunds 4m-8m in height, total material moved 20 000 tonnes – 100 000 tonnes; and
- *Small:* Total site area <2 500 m², 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 wetter months.

Construction

The dust emission magnitude for the construction phase has been determined based on the below criteria:

- *Large:* Total building volume >100 000m³, on site concrete batching; sandblasting
- *Medium:* Total building volume 25 000m³ – 100 000m³, potentially dusty construction material (e.g. concrete), on site concrete batching; and,
- *Small:* Total building volume <25 000m³, construction material with low potential for dust release (e.g. metal cladding or timber).

Trackout

The dust emission magnitude for trackout has been determined based on the below criteria:

- *Large:* >50 HGV (>3.5t) outward movements in any one day, potentially dusty surface material (e.g. high clay content), unpaved road length >100m;
- *Medium:* 10-50 HGV (>3.5t) outward movements in any one day, moderately dusty surface material (e.g. high clay content), unpaved road length 50m – 100m; and,
- *Small:* <10 HGV (>3.5t) outward movements in any one day, surface material with low potential for dust release, unpaved road length <50m.

Step 2B - Defining the Sensitivity of the Area

Sensitivities of People to Dust Soiling Effects

- *High:*
 - * Users can reasonably expect an enjoyment of a high level of amenity;
 - * The appearance, aesthetics or value of their property would be diminished by soiling; and the people or property would reasonably expect to be present continuously, or at least regularly for extended periods, as part of the normal pattern of use of the land; and,
 - * Indicative examples include dwellings, museums and other culturally important collections, medium- and long-term car parks

¹ Institute of Air Quality Management 2014. *Guidance on the Assessment of dust from demolition and construction.*

and car showrooms.

• **Medium:**

- * Users can reasonably expect to enjoy a reasonable level of amenity, but would not reasonably expect to enjoy the same level of amenity as in their home;
- * The appearance, aesthetics or value of their property could be diminished by soiling;
- * 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; and,
- * Indicative examples include parks and places of work.

• **Low:**

- * The enjoyment of amenity would not reasonably be expected;
- * Property would not reasonably be expected to be diminished in appearance, aesthetics or value by soiling;
- * 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; and,
- * Indicative examples include playing fields, farmland (unless commercially sensitive horticultural), footpaths, short term car parks and roads.

The sensitivity of the area should be derived for each of the four activities: demolition, construction, earthworks and trackout, using the following table:

Table B-1. Sensitivity of the Area to Dust Soiling Effects on People and Property

Receptor Sensitivity	Number of Receptors	Distance from the Source (m)			
		<20	<50	<100	<350
High	>100	High	High	Medium	Low
	10-100	High	Medium	Low	Low
	1-10	Medium	Low	Low	Low
Medium	>1	Medium	Low	Low	Low
Low	>1	Low	Low	Low	Low

Note - The likely routes the construction traffic will use should also be included to enable the presence of trackout receptors to be included in the assessment. As a general guidance, without site-specific mitigation, trackout may occur along the public highway up to 500 m from large sites (as defined in step 2A), 200 m from medium sites and 50 m from small sites, as measured from the site exit.

Sensitivities of People to the Health Effects of PM₁₀

• **High:**

- * Locations where members of the public are exposed over a time period relevant to the air quality objective for PM₁₀ (in the case of the 24-hour objectives, a relevant location would be one where individuals may be exposed for eight hours or more in a day);
- * Indicative examples include residential properties. Hospitals, schools and residential care homes should also be considered as having equal sensitivity to residential areas for the purposes of this assessment.

• **Medium:**

- * Locations where the people exposed are workers, and exposure is over a time period relevant to the air quality objective for PM₁₀ (in the case of the 24-hour objectives, a relevant location would be one where individuals may be exposed for eight hours or more in a day); and,
- * Indicative examples include office and shop workers, but will generally not include workers occupationally exposed to PM₁₀, as protection is covered by Health and Safety at Work legislation.

• **Low:**

- * Locations where human exposure is transient; and,
- * Indicative examples include public footpaths, playing fields, parks and shopping streets.

The sensitivity of the area should be derived for each of the four activities: demolition, construction, earthworks and trackout, using the following table:

Table B-2. Sensitivity of the Area to Human Health Impacts

Receptor Sensitivity	Annual Mean PM_{10} Concentration	Number of Receptors	Distance from the Source (m)				
			<20	<50	<100	<200	<350
High	>32 $\mu\text{g}/\text{m}^3$	>100	High	High	High	Medium	Low
		10-100	High	High	Medium	Low	Low
		1-10	High	Medium	Low	Low	Low
	28 - 32 $\mu\text{g}/\text{m}^3$	>100	High	High	Medium	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	High	Medium	Low	Low	Low
	24 – 28 $\mu\text{g}/\text{m}^3$	>100	High	Medium	Low	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	<24 $\mu\text{g}/\text{m}^3$	>100	Medium	Low	Low	Low	Low
		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Medium	-	>10	High	Medium	Low	Low	Low
	-	1-10	Medium	Low	Low	Low	Low
Low	-	>1	Low	Low	Low	Low	Low

Note - The likely routes the construction traffic will use should also be included to enable the presence of trackout receptors to be included in the assessment. As a general guidance, without site-specific mitigation, trackout may occur along the public highway up to 500 m from large sites (as defined in step 2A), 200 m from medium sites and 50 m from small sites, as measured from the site exit.

Sensitivities of Receptors to Ecological Effects

- *High:*
 - * Locations with an international or national designation and the designated features may be affected by dust soiling;
 - * 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; and,
 - * Indicative examples include a Special Area of Conservation (SAC) designated for acid heathlands or a local site designated for lichens adjacent to the demolition of a large site containing concrete (alkali) buildings.
- *Medium:*
 - * Locations where there is a particularly important plant species, where its dust sensitivity is uncertain or unknown;
 - * Locations with a national designation where the features may be affected by dust deposition; and,
 - * Indicative example is a Site of Special Scientific Interest (SSSI) with dust sensitive features.
- *Low:*
 - * Locations with a local designation where the features may be affected by dust deposition; and,
 - * Indicative example is a local Nature Reserve with dust sensitive features.

The sensitivity of the area should be derived for each of the four activities: demolition, construction, earthworks and trackout, using the following table:

Table B-3. Sensitivity of the Area to Ecological Impacts

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

Note - The likely routes the construction traffic will use should also be included to enable the presence of trackout receptors to be included in the assessment. As a general guidance, without site-specific mitigation, trackout may occur along the public highway up to 500 m from large sites (as defined in step 2A), 200 m from medium sites and 50 m from small sites, as measured from the site exit.

Step 2C - Defining the Risk of Impacts

The risk of impacts with no mitigation is determined by combining the dust emission magnitude determined in Step 2A and the sensitivity of the area determined in Step 2B.

The following tables provide a method of assigning the level of risk for each activity.

*Demolition***Table B-4.** Risk of Dust Impacts, Demolition

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

*Earthworks***Table B-5.** Risk of Dust Impacts, Earthworks

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

*Construction***Table B-6.** Risk of Dust Impacts, Construction

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

*Trackout***Table B-7.** Risk of Dust Impacts, Trackout

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

Step 3 – Site Specific Mitigation

The dust risk categories for each of the four activities determined in Step 2C should be used to define the appropriate, site-specific mitigation measures to be adopted.

These mitigation measures are contained within section 8.2 of the IAQM Guidance on the Assessment of Dust from Demolition and Construction.

APPENDIX C - THEORETICAL SCENARIO (NO REDUCTION IN UK FLEET EMISSIONS OVER TIME) RESULTS

Scenario Context

This additional theoretical scenario uses emission factors for 2019 for the 'do minimum' and 'do something' based on a recent appeal decision (planning reference no.APP/D3830/A/14/22269877) that favoured the uncertainty of emissions forecasts. It should be noted that this is a theoretical scenario which assumes that the government (Defra) predictions for reductions in emissions over the forthcoming years will not occur. This should not be considered as a 'more correct' scenario in accordance with the 2010 note

[<http://laqm.defra.gov.uk/laqm-faqs/faq5.html>] which confirms that: 'There is no evidence to suggest that background concentrations associated with the other (non-traffic) source contributions should not behave as forecast. This disparity in the historical data highlights the uncertainty of future year projections of both NO_x and NO₂, but at this stage there is no robust evidence upon which to base any revised road traffic emissions projections'.

The two assessment scenarios are defined below:

- 2022 'Do Minimum' Theoretical Scenario = Baseline Conditions + Committed Development Flows (using 2019 traffic emission factors); and,
- 2022 'Do Something' Theoretical Scenario = Baseline Conditions + Committed Development Flows + Proposed Development Flows (using 2019 traffic emission factors).

Nitrogen Dioxide

Table C-1 presents a summary of the predicted long term NO₂ concentrations at relevant proposed receptor locations based on the modelled 2022 'Do Minimum' and 'Do Something' scenarios.

Table C-1. Predicted Annual Average Concentrations of NO₂ at Receptor Locations

Receptor		NO ₂ (µg/m ³)			
		2019 Baseline	2022 Do Minimum	2022 Do Something	Development Contribution
R1	Residential property at 432 Chichester Road	21.89	22.46	22.46	<0.01
R2	Residential property at 27 Chichester Road	18.09	18.51	18.51	<0.01
R3	Residential property at 28 Crossfields	15.36	15.64	15.64	<0.01
R4	Residential property at 23 Stoneage Close	20.35	20.79	21.04	0.25
R5	Residential property at 20 Rowan Way	21.89	22.40	22.73	0.33
R6	Residential property at Shripney Road	21.07	21.54	21.75	0.21
R7	Residential property at Shripney Road	25.87	26.54	26.83	0.29
Annual Mean AQO		40 µg/m ³			

All modelled existing receptors are predicted to be below the AQO for NO₂ in both the 'Do Minimum' and 'Do Something' scenarios.

As indicated in **Table C-1**, the maximum predicted increase in annual average exposure to NO₂ at any existing receptor, due to changes in traffic movements associated with the proposed development is 0.33 µg/m³ at Residential property at 20 Rowan Way (R5).

The predicted long-term NO₂ concentrations at all existing receptors are below 60 µg/m³ in all scenarios. Therefore, it is unlikely there will be any exceedances for the short-term NO₂ AQO at all modelled receptors as outlined in LAQM TG16 technical guidance.

The impact description of changes in traffic flow associated with the proposed development with respect to annual mean NO₂ exposure has been assessed with reference to the criteria in Section 3. The outcomes of the assessment are summarised in **Table C-2**.

Table C-2. Impact Description of Effects at Key Receptors (NO₂)

Impact Description of NO ₂ Effects at Key Receptors					
Receptor	Change Due to Development (DS-DM) (µg/m ³)	Change due to Development (% of AQO)	% Change in Concentration Relative to AQO	% Annual Mean Concentration in Assessment Year	Impact Description
R1	<0.01	<0.01	0%	≤75% of AQO	Negligible
R2	<0.01	<0.01	0%	≤75% of AQO	Negligible
R3	<0.01	<0.01	0%	≤75% of AQO	Negligible
R4	0.25	0.63	1%	≤75% of AQO	Negligible
R5	0.33	0.83	1%	≤75% of AQO	Negligible
R6	0.21	0.53	1%	≤75% of AQO	Negligible
R7	0.29	0.73	1%	≤75% of AQO	Negligible

+0% means a change of <0.5% as per explanatory note 2 of table 6.3 of the EPUK IAQM Guidance.

The impact description of the effects of changes in traffic flow as a result of the proposed development, with respect to NO₂ exposure for existing receptors, is determined to be 'negligible' at all modelled receptors. This is based on the methodology outlined in section 3. Given the quantitative nature of the assessment and the verification of the air quality dispersion model, the confidence of the assessment is deemed to be 'high'.

Particulate Matter (PM₁₀)

Table C-3 presents a summary of the predicted change in annual mean PM₁₀ concentrations at relevant receptor locations, due to changes in traffic flow associated with the proposed development, based on modelled 'Do Minimum' and 'Do Something' scenarios.

Table C-3. Predicted Annual Average Concentrations of PM₁₀ at Receptor Locations

Receptor		PM ₁₀ (µg/m ³)			
		2019 Baseline	2022 Do Minimum	2022 Do Something	Development Contribution
R1	Residential property at 432 Chichester Road	16.04	16.11	16.11	<0.01
R2	Residential property at 27 Chichester Road	15.43	15.47	15.47	<0.01
R3	Residential property at 28 Crossfields	15.28	15.31	15.31	<0.01
R4	Residential property at 23 Stoneage Close	16.06	16.10	16.13	0.02
R5	Residential property at 20 Rowan Way	16.41	16.47	16.51	0.04
R6	Residential property at Shripney Road	15.39	15.45	15.48	0.03
R7	Residential property at Shripney Road	17.09	17.18	17.22	0.04
Annual Mean AQO		40 µg/m ³			

All modelled existing receptors are predicted to be below the AQO for PM₁₀ in both the 'Do Minimum' and 'Do Something' scenarios.

As indicated in **Table C-3**, the maximum predicted increase in annual average exposure to PM₁₀ at any existing receptor, due to changes in traffic movements associated with the construction phase is 0.04 µg/m³ at Residential property at 20 Rowan Way (R5).

The impact description of changes in traffic flow associated with the proposed development with respect to annual mean PM₁₀ exposure has been assessed with reference to the criteria in Section 3. The outcomes of the assessment are summarised in **Table C-4**.

Table C-4. Impact Description of Effects at Key Receptors (PM₁₀)

Impact Description of PM ₁₀ Effects at Key Receptors					
Receptor	Change Due to Development (DS-DM) (µg/m ³)	Change due to Development (% of AQO)	% Change in Concentration Relative to AQO	% Annual Mean Concentration in Assessment Year	Impact Description
R1	<0.01	<0.01	0%	≤75% of AQO	Negligible
R2	<0.01	<0.01	0%	≤75% of AQO	Negligible
R3	<0.01	<0.01	0%	≤75% of AQO	Negligible
R4	0.02	0.06	0%	≤75% of AQO	Negligible
R5	0.04	0.10	0%	≤75% of AQO	Negligible
R6	0.03	0.06	0%	≤75% of AQO	Negligible
R7	0.04	0.10	0%	≤75% of AQO	Negligible

+0% means a change of <0.5% as per explanatory note 2 of table 6.3 of the EPUK IAQM Guidance.

The impact description of the effects of changes in traffic as a result of the construction phase, with respect to annual mean PM₁₀ exposure for existing receptors is determined to be 'negligible' based on the methodology outlined in section 3. Given the quantitative nature of the assessment and the verification of the air quality dispersion model, the confidence of the assessment is deemed to be 'high'.

Particulate Matter (PM_{2.5})

Table C-5 presents a summary of the predicted change in annual mean PM₁₀ concentrations at relevant receptor locations, due to changes in traffic flow associated with the construction phase, based on modelled 'Do Minimum' and 'Do Something' scenarios.

Table C-5. Predicted Annual Average Concentrations of PM_{2.5} at Receptor Locations

Receptor		PM _{2.5} (µg/m ³)			
		2019 Baseline	2022 Do Minimum	2022 Do Something	Development Contribution
R1	Residential property at 432 Chichester Road	11.86	11.99	11.99	<0.01
R2	Residential property at 27 Chichester Road	10.79	10.87	10.87	<0.01
R3	Residential property at 28 Crossfields	10.85	10.92	10.92	<0.01
R4	Residential property at 23 Stoneage Close	11.53	11.60	11.64	0.04
R5	Residential property at 20 Rowan Way	12.16	12.26	12.32	0.07
R6	Residential property at Shripney Road	11.49	11.60	11.64	0.04
R7	Residential property at Shripney Road	13.36	13.52	13.59	0.07
Annual Mean AQO		25 µg/m ³			

All modelled existing receptors are predicted to be below the AQO for PM_{2.5} in both the 'Do Minimum' and 'Do Something' scenarios.

As indicated in **Table C-5**, the maximum predicted increase in annual average exposure to PM_{2.5} at any existing receptor, due to changes in traffic movements associated with the proposed development is 0.07 µg/m³ at Residential property at 20 Rowan Way (R5).

The impact description of changes in traffic flow associated with the proposed development with respect to annual mean PM₁₀ exposure has been assessed with reference to the criteria in Section 3. The outcomes of the assessment are summarised in **Table C-6**.

Table C-6. Impact Description of Effects at Key Receptors (PM_{2.5})

Impact Description of PM _{2.5} Effects at Key Receptors					
Receptor	Change Due to Development (DS-DM) (µg/m ³)	Change due to Development (% of AQO)	% Change in Concentration Relative to AQO	% Annual Mean Concentration in Assessment Year	Impact Description
R1	<0.01	<0.01	0%	≤75% of AQO	Negligible
R2	<0.01	<0.01	0%	≤75% of AQO	Negligible
R3	<0.01	<0.01	0%	≤75% of AQO	Negligible
R4	0.04	0.16	0%	≤75% of AQO	Negligible
R5	0.07	0.27	0%	≤75% of AQO	Negligible
R6	0.04	0.18	0%	≤75% of AQO	Negligible
R7	0.07	0.28	0%	≤75% of AQO	Negligible

+0% means a change of <0.5% as per explanatory note 2 of table 6.3 of the EPUK IAQM Guidance.

The impact description of the effects of changes in traffic as a result of the proposed development, with respect to annual mean PM₁₀ exposure for existing receptors is determined to be 'negligible' based on the methodology outlined in section 3. Given the quantitative nature of the assessment and the verification of the air quality dispersion model, the confidence of the assessment is deemed to be 'high'.

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