



Date 29 March 2023
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Department for Operations

Dean Clapworthy
Bury Council Planning Department

Dear Dean

**Radcliffe Civic Hub, 13-21 Blackburn Street, Radcliffe, Manchester, M26 1NN,
Planning Application: 69388 – Air Quality**

I write regarding the above planning application. The Environment Section has received copies of the following reports:

- Air Quality Assessment for Radcliffe Civic Hub, Bury, Redmore Environmental, Reference: 4982-1r1, 21 December 2022.
- Interim Travel Plan, Radcliffe Civic Hub, Vinci Construction UK Limited, Reference: 70092923, February 2023.

The Environment Section has reviewed the above information in order to assess the following points:

1. The adequacy of the construction phase assessment.
2. The adequacy of the operational phase assessment.
3. Planning conditions and comments recommended.

It is understood that the proposed development comprises the demolition of 13-21 Blackburn Street/TSB Bank and construction of a three-storey civic hub building (leisure centre and library), a link block between Radcliffe Market and Market Chambers buildings, and the refurbishment of Market Chambers and Market Hall basement, for use as a multi-use event space, with associated external alterations and works and hard and soft landscaping.

The proposal includes 8 no. blue badge car parking spaces. Part of the site is situated within an Air Quality Management Area (Deansgate/Church Street).

Please note that the 'UK Plan for Tackling Roadside NO₂', published in July 2017, identified Bury Council as an area having one or more roads with concentrations of NO₂ above statutory limits, according to more recent modelling results. Bury is therefore required to address these exceedances and we are currently engaging with Government on our proposed plans to reduce NO₂ concentrations across the borough.

The proposed development has been identified by the consultant to have the potential to cause air quality impacts at sensitive locations. These may include fugitive dust emissions associated with construction works and road traffic exhaust emissions from

vehicle movements during the operational phase. An Air Quality Assessment was therefore undertaken to determine baseline conditions, consider location suitability for the proposed end use and assess potential effects as a result of the scheme.

1. The adequacy of the construction phase assessment

Assessment: Potential effects during the construction phase include fugitive emissions from site activities such as earthworks, construction and trackout which are all considered, along with the sensitivity of the area, in the assessment. Potential sensitive receptors included housing which are located within 20m of the site boundary. There are no ecological receptors within 50m of the site.

The construction phase assessment was based on the guidance in the Institute of Air Quality Management's (IAQM) 'Guidance on the Assessment of Dust from Demolition and Construction' 2014.

The potential impacts prior to mitigation have been found to be:

Potential Impact	Risk			
	Demolition	Earthworks	Construction	Track Out
Dust soiling effects on people and property	Not assessed	Medium	Low	Negligible
Risks to human health due to significant increases in exposure to PM ₁₀ .	Not assessed	Negligible	Negligible	Negligible

Site specific mitigation measures as recommended in the IAQM Guidance on the Assessment of Dust from earthworks, construction and trackout are to be implemented. Once in place, the residual impacts are considered to be 'not significant'.

It is noted that although the proposal includes the demolition of existing buildings, the potential impacts associated demolition have not been included in the assessment. Please provide an assessment of the risks to sensitive receptors from demolition activities.

Mitigation measures: Mitigation measures outlined in Table 18 of the report (Redmore Environmental, Reference: 4982-1r1, 21 December 2022)- for the earthworks and construction phases of the development are acceptable to this Section. Please ensure that these measures are fully implemented during the construction phase of the development.

A Dust Management Plan should be provided to demonstrate how dust emissions will be reduced throughout the construction phase of the development.

2. The adequacy of the operational phase assessment

The impacts during the operational phase include exhaust emissions from road traffic generated. The Transport Consultants have indicated that the development is predicted to produce less than 100 movements on any one link on the local road network. Therefore, it is not predicted to result in an increase in LDV (light duty vehicles) of more than 100AADT within the AQMA or 500 AADT elsewhere. Additionally, the proposals do not include any significant highway realignment or the introduction of new junctions, and the proposed Radcliffe Civic Hub will not require than 25 HDV deliveries per day.

Therefore, potential air quality impacts associated with the operational phase are predicted to be not significant in accordance with the IAQM screening criteria. A Detailed Operational Air Quality Assessment was not therefore required.

Mitigation for the Operational Phase: The report does not recommend any operational phase mitigation measures to control effects on local residents. However, it is recommended that the good design principles and best practice measures, as outlined in IAQM and EPUK Guidance, are followed to ensure emissions are minimised.

An Interim Travel Plan (Vinci Construction UK Limited, Reference: 70092923, February 2023) which sets out measures to encourage sustainable means of transport (public, cycling and walking) has been submitted with the application. A final version of the Travel Plan will be required.

Bury Council has been identified by DEFRA as an area requiring to significantly improve air quality. The required measures to do this are currently under discussion. Due to this requirement, and the requirements of the new building regulations (The Building Regulations 2010, Approved Document S, Infrastructure for the charging of electric vehicles), it is recommended that electric vehicle charging provision is included in the development.

3. Planning conditions and comments recommended

Bury Council has been identified by DEFRA as an area requiring to significantly improve air quality. The required measures to do this are currently under discussion. Due to this requirement, this Section recommends the following condition to be placed on any planning permission granted:

- **Air Quality Condition – Dust:** *No development shall commence unless and until a scheme to minimise dust emissions has been submitted to and approved in writing by the Local Planning Authority, as outlined in Table 18 Fugitive Dust Emissions Mitigation Measures, of the report (Air Quality Assessment for Radcliffe Civic Hub, Bury, Redmore Environmental, Reference: 4982-1r1, 21 December 2022). The scheme shall include details of all dust control measures and the methods to monitor emissions of dust arising from the development. The development shall be implemented in accordance with the approved scheme with the approved dust control measures being retained and maintained in a fully functional condition for the duration of the development hereby approved.*

Reason: The information is required to reduce the impacts of dust disturbance from the site on the local environment, pursuant to chapter 11 of the NPPF - Conserving and enhancing the natural environment.

Conclusion

In order for this Section to be satisfied that the proposed development poses a low risk to local air quality the following information is required:

Construction Phase

- (i) An assessment of the potential impacts on sensitive receptors from demolition activities.
- (ii) A Dust Management Plan to demonstrate how dust emissions will be reduced throughout the construction phase of the development.

Operational Phase

- (iii) A Travel Plan, which sets out measures to encourage sustainable means of transport (public, cycling and walking).

Please do not hesitate to contact me if you require any clarification of the above.

Yours sincerely



Rebecca Jones
Environmental Protection Officer

Please Note: The Environment Section has used all reasonable endeavours to determine the risk from contaminated land and ground gas based upon the information available to it. However, the comments made above should not be taken to imply that the land is safe or otherwise suitable for this or any other development. The responsibility for safe development rests with the developer.

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