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Your Ref 67596
Date 20 January 2022
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Department for Operations

Jennie Townsend
Bury Council Planning Department

Dear Jennie

Fernhill Caravan Site, Every Street, Bury, BL9 5BE. Planning Application: 67596 – Air Quality

The Environment Section has received a copy of the following report:

- Air Quality Assessment, Every Street, Bury, BL9 5BE, Reference: AA0239, September 2021.

The Environment Section has reviewed the above information to assess the adequacy of the Air Quality Assessment.

The proposal is for the demolition of 17 existing Gypsy and Traveller pitches, amenity blocks and management blocks and the redevelopment of the site to provide 12 permanent Gypsy and Traveller pitches including new amenity buildings and management block.

The site is not situated within an Air Quality Management Area (AQMA).

1. Adequacy of the Construction Phase - Air Quality Assessment

An assessment of the potential impacts arising from the construction of the proposed development was undertaken in accordance with IAQM Guidance.

Activities on the proposed construction site have been divided into four types to reflect their different potential impacts; demolition, earthworks, construction, and trackout. The potential dust emissions were assessed for the following; annoyance due to dust soiling, harm to ecological receptors and risk of health effects due to a significant increase in exposure to PM₁₀.

The assessment steps are:

- Step 1 – screen the requirement for a more detailed assessment. No assessment is required if there are no receptors within a certain distance of the works.

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- Step 2 – assess the risk of dust impacts separately for each of the four activities considered (demolition, earthworks, construction and trackout).
 - Step 2A – The scale and nature of the works, which determines the magnitude of dust arising as small, medium or large;
 - Step 2B – The sensitivity of the area to dust impacts, which can be defined as low, medium or high sensitivity;
 - Step 2C – determine the risk of dust impacts by combining the findings of steps 2A and 2B.
- Step 3 – determine the site-specific mitigation measures from the IAQM guidance for each of the four activities.
- Step 4 – examine the residual effects and determine significance.

Step 1 and Step 2 - The potential risk of dust soiling is **medium** from demolition and earthworks and **low** from construction and trackout. The potential risk of human health impacts is **negligible** from demolition, construction and trackout and **low** from earthworks.

Step 3 - Site-specific Mitigation - The IAQM guidance provides details of highly recommended and desirable mitigation measures which have been adapted for this development site. These may be reviewed prior to the commencement of construction works and incorporated into a Construction Environmental Management Plan or similar.

The proposed mitigation measures comprise the following:

Communications:

- Display contact details for person (s) accountable for air quality and dust issues on the site boundary.
- Display the head or regional office contact information.

Site management:

- Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken.
- Make the complaints log available to the LA upon request.
- Record any exceptional incidents that cause dust and/or air emissions, either on or offsite, and the action taken to resolve the situation in the log book.

Monitoring:

- Carry out regular site inspections, record inspection results, and make an inspection log available to the LA upon request.
- Increase the frequency of site inspections when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.

Site preparation:

- Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.
- Erect solid screens or barriers around dusty activities or the site boundary that are least as high as any stockpiles on site.

- Fully enclose site or specific operations where there is a high potential for dust production and they are active for an extensive period.
- Avoid site runoff of water or mud.
- Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used.
- Cover, seed or fence stockpiles to prevent wind whipping.

Operating vehicle/machinery and sustainable travel:

- Ensure all vehicles switch off engines when stationary - no idling vehicles.
- Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable.

Operations:

- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques.
- Ensure an adequate water supply on the site for effective dust suppression, using non-potable water where possible and appropriate.
- Use enclosed chutes and conveyors and covered skips.
- Minimise drop heights and use fine water sprays wherever appropriate.
- Ensure equipment is available to clean any dry spillages, and clean up spillages as soon as reasonably practicable using wet cleaning methods.

Waste management:

- No bonfires or burning of waste materials.

Demolition:

- Ensure effective water suppression is used during demolition operations.
- Avoid explosive blasting, using appropriate manual or mechanical alternatives.

Construction:

- Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out.

Trackout:

- Use water-assisted dust sweeper on access and local roads, if required.
- Avoid dry sweeping of large areas.
- Ensure vehicles entering and leaving site are covered to prevent escape of materials.

Step 4 - Assuming the relevant mitigation measures outlined in the report are implemented, the residual impact from all dust generating activities is predicted to be **not significant**, in accordance with the IAQM guidance.

The mitigation measures are acceptable to this Section and should be implemented during the construction phase.

2. Adequacy of the Operational Phase Road Traffic Emissions Screening Assessment

The trip generation of the proposed development is predicted to be 88 daily vehicle movements therefore the proposals are not predicted to result in an increase of LDV flows of more than 500 AADT on any individual road link or 100 AADT within an AQMA. Therefore potential air quality impacts associated with the operational phase are predicted to be **not significant** in accordance with the IAQM screening criteria.

Consequently, the impact was considered insignificant and a detailed air quality assessment was not undertaken.

3. Potential Future Exposure to Elevated Pollutant Concentrations

The proposed development includes land use sensitive to long term and short term pollutant concentrations. Existing conditions at the site are therefore considered.

As the site is not within Bury's AQMA (which is situated 300m to the east) it is considered that exceedances of the AQOs are unlikely to occur at the site.

Proximity to Significant Pollution Sources

The site has been identified as being in the vicinity of existing industrial facilities with the potential to cause residents of the site to be exposed to dust.

Additionally, Every Street is an unadopted road which runs adjacent to the site. Every Street has been described as minor in nature and therefore considered to be unlikely to contribute significantly to pollution levels. However, the Environment Section is aware that the road is not in a good state of repair and should also be considered as a source of dust pollution. The road is also the only access route to the recycling centre at the end of Every Street, which is likely to be the destination of a significant proportion of traffic including cars and commercial vehicles that use the road.

Local Monitoring Results

It is considered likely that pollutant concentrations are below the relevant AQOs at the proposed development site for the following reasons:

- The site is not located within an AQMA;
- The site is distanced from major pollution sources;
- Analysis of local monitoring results in the context of the site location and survey positions has indicated likely compliance with the AQO for NO₂ at the development;
- and;
- Predicted background concentrations are well below the relevant AQOs.

Based on the assessment results, exposure of future residents to exceedances of the AQOs is not considered likely. As such, the site is considered suitable for the proposed use from an air quality perspective.

Potential Future Exposure to Fugitive Dust Emissions

As there is not adopted guidance for the assessment of dust from industrial or commercial premises the consultant has assessed the potential effects in accordance with best practice produced in IAQM guidance documents. This is a hypothetical relationship between the source, the pathway and the receptor.

The magnitude of each fugitive source was identified below.

Industrial facility - Negligible

SUEZ Recycling and Recovery UK – Negligible

Bettamix Concrete - Slight

Diggers Bury Council Abbey Skips Waster Transfer Station – Negligible

Abbey Skips, Waster Transfer Station - Slight

The IAQM Guidance states that only if the impact is greater than slight is the effect considered significant.

Conclusion

The assessment results have found that air quality factors are not considered a constraint to planning consent for the development.

The above Air Quality Assessment has been found to be acceptable. However, the assessment has not considered the existing issues with dust complaints received by the Council. The complaints have led to improvements to and implementation of dust mitigation procedures at Bettamix Concrete. However as there has been a further complaint following the improvements, other sources of dust should also be considered. Therefore to ensure residents are not subject to significant dust impacts this Section recommends the following informative is placed on any grant of permission:

Informative: The Air Quality (Air Quality Assessment, Every Street, Bury, BL9 5BE, Reference: AA0239, September 2021) assessment report has found that air quality factors are not considered a constraint to the development. However, due to complaints regarding dust received by the Council from residents of the site, this Section recommends that dust monitoring and assessment is carried out to identify if there is a significant issue and to identify the source of the dust. If the assessment indicates that dust is detrimental to the residents then mitigation measures are to be considered.

Additionally, this Section recommends the following condition be placed on any grant of planning permission:

Air Quality Condition: Prior to occupation the applicant shall provide 1 Electric Vehicle Chargepoint (minimum 7kW*) for each pitch.

*Mode 3, 7kW (32A) single phase, or 22kW (32A) three phase, and for 50kW Mode 4 rapid charging may be required. British Standard BS EN 61851-1:2011 to be used note this version is due to be replaced by BS EN 61851-1:2019 on 5 July 2022).

Reason: In accordance with the NPPF, to encourage the uptake of ultra-low emission vehicles and ensure the development is sustainable. To safeguard residential amenity, public health and quality of life.

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

Yours sincerely



Judith Scott
Environmental Protection Officer
The Environment Section

Please Note:

The Environmental Services Division 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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