

Proposed Residential Development: Land off Dumers Lane, Radcliffe, Bury

Planning Application Reference: 71426

Air Quality Assessment: Addendum

1. Background

- 1.1. A planning application has been submitted by Westchurch Homes Ltd. to Bury Council (BC) for the residential development of land off Dumers Lane in Radcliffe, Bury¹. Proposals were for the delivery of 87 residential units with associated access and landscaping.
- 1.2. The application was supported by an Air Quality Assessment (AQA) prepared by Smith Grant LLP (SGP)². This submitted report is referred to hereafter as the 'SGP 2024 AQA'.
- 1.3. The SGP 2024 AQA assessed the potential air quality impacts due to the proposed 87 unit scheme and included a construction dust assessment and a vehicle emissions screening assessment.
- 1.4. A consultee response has been received from the BC Environment Section with regards air quality³. The response does not raise any concerns or requests for further information in relation to the scheme and air quality, other than recommending the inclusion of two Conditions within any subsequently granted planning permission as follows:

AIR QUALITY – CONDITION

The site is not located within an Air Quality Management Area. An air quality assessment has been submitted to support the application (see attached appraisal CL1099.AQ.200125.1), which concluded that the that the development would not create an increase of more than 500 AADT (annual average daily traffic). However, in order to mitigate the potential dust risk during the construction phase a Dust Management Plan is required. The proposed development will have off-street parking. 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 Building Regulation (The Building Regulations 2010, Approved Document S, Infrastructure for the charging of electric vehicles), this Section recommends the following condition to be placed on any grant of permission:

¹ Bury Council, planning reference 71426, submitted December 2024

² Smith Grant LLP, Proposed Residential Development: Land off Dumers Lane, Radcliffe, Bury, Air Quality Assessment, for Westchurch Homes Limited, November 2024, ref: R3407-R01-v2

³ Bury Council, Environment Section, consultee response on application 71426, dated 20th January 2025

AQ01 - ELECTRIC VEHICLE CHARGE POINTS

- 1 no. electric vehicle (EV) charging point (minimum 7kW*) per dwelling/parking space.
- Cable routes to be provided for all parking spaces which do not have access to an electric vehicle charging point.

Certification and photographic evidence of the installation of the agreed electric vehicle charge points shall be submitted to Local Planning Authority for approval prior to the development being brought into use. The infrastructure shall be maintained and operational in perpetuity.

**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 61851-1:2019 to be used. Further information regarding minimum standards can be found at <https://www.gov.uk/transport/low-emissionand-electric-vehicles>.*

Reason: To encourage the uptake of ultra-low emission vehicles and ensure the development is sustainable and to safeguard residential amenity, public health and quality of life with respect to Local Air Quality, in accordance with paragraphs 112e, 117e, 187e and 199 of the National Planning Policy Framework (December 2024) and Places for Everyone Policy JP-S5 (Clean Air).

AQ02: DUST MANAGEMENT DURING CONSTRUCTION

No development shall commence unless and until a scheme to minimise dust emissions has been submitted to the Local Planning Authority for approval.

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: To reduce the impacts of dust disturbance from the site on the local air quality and the environment in accordance with paragraph 187e of the National Planning Policy Framework (December 2024) and Places for Everyone Policy JP-S5 (Clean Air).

- 1.5. Westchurch Homes have since amended the proposals. The revisions include for a reduction in the proposed number of residential units to 77. They also include changes to the layout, including the location of the site access. The access is now proposed to be off Wild Street, instead of the original proposed separate access off Dumers Lane. The revised layout plan is provided in Appendix A.

- 1.6. This following Addendum has therefore been produced by SGP to assess whether the revisions affect the conclusions of the original SGP 2024 AQA. This addendum also considers whether there have been any changes to legislation, guidance, or local air quality status since the 2024 AQA that would affect the conclusions of the original assessment. This Addendum should therefore be read in conjunction with the original SGP 2024 AQA; it does not replace that earlier report.

2. Changes in Air Quality Assessment Legislation and Guidance

2.1. National Planning Policy Framework (NPPF)

2.1.1. The version of the NPPF referred to in the SGP 2024 AQA has since been revised, with the latest version being issued in February 2025. The numbering of the paragraphs in the NPPF relevant to the AQA have altered, however the text has not. Ther revisions to the NPPF do not therefore affects the findings and conclusions of the SGP 2024 AQA.

2.2. Interim Defra Guidance on PM_{2.5} Targets

2.2.1. As set out in Section 2.2 of the SGP 2024 AQA, new ambient air quality standards have been established for fine particulate matter of less than 2.5 µm (PM_{2.5}) under the Environment Act 2021 and the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023.

2.2.2. The responsibility for meeting the new PM_{2.5} targets remains with national government although local authorities have a role in delivering reductions in PM_{2.5}. As noted in paragraph 2.2.8 of the SGP 2024 AQA, guidance on how the new PM_{2.5} targets would be integrated into the planning system was awaited at the time of preparation of that report.

2.2.3. At present, Defra is still in the process of developing guidance for developers and planning authorities on how to consider the new air quality targets for PM_{2.5} in planning decisions. A consultation on the new approach and guidance is expected to be published in 2025. However, Defra has issued interim guidance to provide developers and planning authorities with clarity on how to consider the new targets whilst the full guidance is under development⁴.

2.2.4. The interim guidance sets out that, whilst achievement of the targets will be assessed at relevant monitoring sites across the UK, the targets apply to ambient air across the UK. Applicants and Local Planning Authorities should therefore consider the impact of developments on air quality in all ambient air, whether a monitor is in place.

2.2.5. The interim guidance sets out a series of questions to be used as prompts to support the interim process. The questions included in the interim guidance and responses relevant to this application are set out in Section 4 below.

⁴ Department for Environment, Food and Rural Affairs, PM_{2.5} Targets: Interim Planning Guidance, undated

2.3. Revised Institute of Air Quality Management (IAQM) Guidance

2.3.1. The IAQM has issued updated guidance on the assessment of dust from demolition and construction⁵ since the SGP 2024 AQA. One of the key changes in the guidance is a reduction of the dust assessment screening distance from 350m to 250m for human receptors. However, given the close proximity of the existing residential area to the east of the Site, this screening distance change does not affect the dust assessment as presented in the SGP 2024 AQA. The updated guidance does not affect the outcome of the original assessment.

2.4. Other Legislative and Guidance Changes

2.4.1. There have not been any other changes or updates to the air quality legislation and guidance referred to in the SGP 2024 AQA.

⁵ Institute of Air Quality Management (IAQM), Guidance on the assessment of dust from demolition and construction v2.2, January 2024.

3. Updated Site Setting and Local Air Quality Information

3.1. Site Setting

3.1.1. SGP is unaware of any changes to the general site setting since production of the 2024 AQA.

3.2. Local Air Quality

Air Quality Management Areas (AQMA)

3.2.1. At the time of the SGP 2024 AQA Greater Manchester Combined Authority (GMCA) had declared an AQMA that encompassed the A56 to the east and the A6053 / A665 to the west of the Site. There have not been any changes to the declared AQMA since the SGP 2024 AQA.

Updated Local Air Quality Monitoring

3.2.2. At time of writing the 2024 AQA, the most recently available Air Quality Annual Status Report (ASR) was the 2023 ASR⁶ which summarised ambient air quality monitoring up until the end of 2023. The GMCA have since published a 2024 ASR⁷, detailing monitoring results up until the end of 2024.

3.2.3. Table 5.2 of the SGP 2024 AQA detailed ambient air quality monitoring locations deemed relevant to the AQA for which information was available at the time of preparation of that report. These locations remain as per the SGP 2024 AQA and Table 5.2 is replicated in Table 1 below.

Table 1: Monitoring locations within 2km of the Site

Monitor ID	Location Name	Grid Reference	Type	Distance & Orientation from Site
Continuous Analysers				
BURW	Bury Whitefield	380636, 406973	Roadside	1.30km SE
BUR1	Bury Radcliffe	378190, 407480	Roadside	1.61km SW
Diffusion Tubes				
BU3ANO*	Bury Whitefield	380636, 406973	Roadside	1.30km SE
BU3BNO*				
BU3CNO*				

Data as presented in the 2023 GMCA Air Quality Annual Status Report

*Located in triplicate with the Bury Whitefield Continuous Analyser

3.2.4. The previously presented monitored nitrogen dioxide (NO₂) concentrations for the period 2018-2023 are summarised in Table 2 below, along with the additional published data for 2024.

⁶ Greater Manchester Combined Authority, 2023 Air Quality Annual Status Report (ASR), June 2023

⁷ Greater Manchester Combined Authority, 2023 Air Quality Annual Status Report (ASR), June 2023

Table 2: Annual Mean Nitrogen Dioxide Concentrations

Ref.	Annual Mean NO ₂ Concentrations (µg/m ³) (bias-adjusted and annualised as appropriate) ¹						
	2018	2019	2020*	2021*	2022	2023	2024
Continuous Analysers							
BURW	25	27	19	20	21	19.6	18.6
BUR1	25	26	20	21.7	20	18.9	17.8
Diffusion Tubes							
BU3**	26.4	26.1	25.2	19.1	20.9	18.8	16.7

Data as presented in the 2024 GMCA Air Quality Annual Status Report and in earlier reports.

* Concentrations recorded in 2020 and 2021 expected to be affected by the implications of the COVID-19 pandemic on local traffic movements.

** Average of results across triplicate located tubes

3.2.5. Annual mean NO₂ concentrations in 2024 were well below the annual objective of 40 µg/m³, and were lower than previously recorded concentrations at these locations.

3.2.6. In addition to the results above, the continuous analysers also measured hourly average NO₂ levels as detailed in Table 5.4 of the SGP 2024 AQA. Neither of the continuous analysers recorded any exceedances of the NO₂ hourly objective 200 µg/m³ (not be exceeded more than 18 times per year) across the 2018-2024 period.

3.2.7. The continuous analysers also record both hourly mean and annual mean PM₁₀ concentrations as detailed in Table 5.6 of the SGP 2024 AQA. The annual mean PM₁₀ concentrations for the years 2018-2024 are shown in the table below.

Table 3: Annual Mean PM₁₀ Concentrations

Ref.	Annual Mean PM ₁₀ Concentrations (µg/m ³)						
	2018	2019	2020*	2021*	2022	2023	2024
BURW	16	18	16	15	16	14	13.1
BUR1	18	17	18	17	18	15.6	14.9

Data as presented in the 2024 GMCA Air Quality Annual Status Report and in earlier reports.

* Concentrations recorded in 2020 and 2021 expected to be affected by the implications of the COVID-19 pandemic on local traffic movements.

3.2.8. As shown in the table, annual mean PM₁₀ concentrations were also well below the annual objective of 40 µg/m³ in 2024. Additionally, neither of the continuous analysers recorded any exceedances of the PM₁₀ daily objective of 50 µg/m³ (not be exceeded more than 35 times per year) in 2024.

Updated Predicted Background Air Quality Data

3.2.9. Tables 5.7 of the SGP 2024 AQA reported the predicted Defra background data for the site and surrounding area. Defra has since released updated predicted data (issued in November 2024) which takes into account revised information on the future UK fleet composition and vehicle emissions, along with 2021 ambient monitoring and meteorological data.

3.2.10. Both the data presented in the 2024 AQA and the revised data are provided in Tables 4a and 4b below.

Table 4a: Predicted Background Air Quality Data – Nitrogen Oxides and Particulate Matter (2024)

Grid Square	Location	Annual Mean Concentration (µg/m³)			
		NO ₂	NO _x	PM ₁₀	PM _{2.5}
Defra – 2018-Based Background Data ¹					
379500 408500	Site	11.84	15.82	10.91	7.37
379500 407500	South of Site / Site entrance	12.62	16.98	11.21	7.67
Defra – 2021-Based Background Data ²					
379500 408500	Site	11.91	15.80	11.34	6.75
379500 407500	South of Site / Site entrance	13.60	18.32	11.56	6.92
	Objective (annual mean)	40	30	40	20 (12) ³

1: From the SGP 2024 AQA. Data downloaded on 26th September 2024; data issued by Defra in August 2020

2: Data downloaded on 20th August 2025; data issued by Defra in November 2024

3: New interim target for PM_{2.5} for 2028

v- established for the protection of vegetation

Table 4b: Predicted Background Air Quality Data – Nitrogen Oxides and Particulate Matter (2029)

Grid Square	Location	Annual Mean Concentration (µg/m³)			
		NO ₂	NO _x	PM ₁₀	PM _{2.5}
Defra – 2018-Based Background Data ¹					
379500 408500	Site	10.45	13.83	10.76	7.26
379500 407500	South of Site / Site entrance	11.07	14.73	11.06	7.56
Defra – 2021-Based Background Data ²					
379500 408500	Site	9.97	13.02	11.09	6.50
379500 407500	South of Site / Site entrance	11.50	15.23	11.31	6.67
	Objective (annual mean)	40	30	40	12 ³

1: From the SGP 2024 AQA. Data downloaded on 26th September 2024; data issued by Defra in August 2020

2: Data downloaded on 20th August 2025; data issued by Defra in November 2024

3: New interim target for PM_{2.5} for 2028

v- established for the protection of vegetation

3.2.11. As shown in the table, the 2021-based background air quality data predicts either similar or slightly higher levels of air pollution compared to the 2018-based background air quality data for most pollutants except for PM_{2.5} where slightly lower concentrations are predicted. However, the predicted air pollution concentrations are still well below their respective objectives.

3.2.12. It should be noted that the data are effectively an average concentration across each 1 km square. Pollutant concentrations will therefore be higher at any individual receptor close to any significant source, such as the town centre and associated road network to the southeast.

3.3. **Summary**

3.3.1. The above air quality data demonstrates the continued expectations for falling background pollutant concentrations, particularly for NO₂ and NO_x.

3.3.2. The updated local air quality data does not affect the findings and conclusions of the SGP 2024 AQA.

4. Impact of the Revised Proposals

4.1. Revised Proposals

4.1.1. The revised proposals include for the following:

- revised red line application boundary to include Wild Street in the south;
- reduction in proposed number of residential units from 87 to 77;
- change in location of proposed access from being a separate direct access off Dumers Lane to being off Wild Street;
- alterations to the internal layout of the scheme, including in the northern and northwestern corners of the Site.

4.1.2. The impacts of these revisions on the original SGP 2024 AQA are discussed below.

4.2. Construction Dust Assessment

4.2.1. The proposed revisions do not affect the findings and conclusions of the construction dust assessment.

4.3. Vehicle Emissions Assessment

4.3.1. The vehicle emissions assessment incorporated a screening assessment of the potential development related traffic movements and routing. At +393 annual average daily traffic (AADT) the predicted LDV movements to / from the Proposed Development are below the indicative threshold of +500 AADT provided in the Institute of Air Quality Management (IAQM) guidance on planning and air quality⁸ for where distant from an AQMA. It was expected that these movements would be split 50:50 east / west on Dumers Lane to / from the Site access.

4.3.2. The reduced number of proposed units would be expected to result in a lower number of daily vehicle movements to / from the Site. Furthermore, as noted in paragraph 7.2.8 of the SGP 2024 AQA the development-related movements would replace existing movements to the parts of the Site in existing use (i.e. car wash and bus company). Hence actual change in vehicle movements to / from the Site would be less than +393 AADT.

4.3.3. The revised layout would bring the movements to / from the Site closer to the existing properties on Wild Street to previously. However, given the numbers are well below the screening threshold it remains that these additional vehicle movements at this location would not be expected to result in significant adverse impacts due to vehicle emissions.

4.3.4. The revisions would not affect movement on the wider road network other than resulting in a reduced quantum to previously expected. Hence, the previous findings and conclusions with respect to vehicle emissions remains, and it is not expected that that the additional vehicle

⁸ Institute of Air Quality Management (IAQM), Land-Use Planning & Development Control: Planning for Air Quality, v1.2, 2017

movements would result in significant adverse impacts on local air quality in relation to human health.

4.3.5. It is also noted that the Environmental Protection consultee response has recommended inclusion of a condition in any granted planning permission requiring provision of electric car charging facilities and cable routes. Accordingly, a plan has since been provided with the planning application detailing the proposed Electric Vehicle Charging Point (EVCP) provision⁹. This will further encourage the take up of low emission vehicles.

4.4. Other Considerations – Existing Local Air Quality

4.4.1. The SGP 2024 AQA additionally considered the potential impacts of introducing new receptors closer to parts of the Bealey Industrial Estate than currently exist. Particular note was made of the presence of Glosta Engineering in the northeast corner of the estate.

4.4.2. It was noted that the proposals included for retention of an existing earth bund in the northwest of the Site, provision of additional acoustic fence to this bund for noise mitigation purposes, providing a six metre high acoustic fence/bund in this area, and provision of a further three metre high acoustic fence for noise mitigation along the western Site boundary. These measures would provide screening from the development to the estate.

4.4.3. It was concluded that there was unlikely there are any sources of aerial emissions on the estate that may result in significant adverse impacts on occupants of the proposed new dwellings. Recommendations were however provided for a period of ambient air quality monitoring within the Site to obtain further information on potential baseline air quality conditions

4.4.4. The revised proposals include for retention of the existing earth bund and provision of acoustic fencing as previously. They do result in a small number of properties being closer to the development northeastern boundary than previously. However, these changes do not affect the previous findings and conclusions. The previous recommendation for a period of ambient air quality monitoring remains, although it remains concluded that there are any sources of aerial emissions on the estate that may result in significant adverse impacts on occupants of the proposed new dwellings.

⁹ Westchruh Homes, Bealey Ind Estate, EVCP Layout, 1025 -EVCP01, dated August 2025

5. Additional PM_{2.5} Assessment

5.1. Introduction

5.1.1. As noted above in paragraphs 2.3-2.7, interim guidance has been issued in relation to the consideration of new PM_{2.5} targets in planning assessments. The guidance sets out a series of questions to be used as prompts to support the interim process. The questions included in the interim guidance and responses relevant to this Application are set out below.

Interim Guidance Question 1: How has exposure to PM_{2.5} been considered when selecting the development site?

Applicants are advised to consider the following in their application:

- *Site proximity to people (particularly large populations and/or vulnerable groups, e.g. schools, hospitals, care homes, areas of deprivation) and the impact of the development on these,*
- *Site proximity to pollution sources and the impact of these on users of the development,*
- *Exposure and emissions during both construction and in-use.*

Response:

5.1.2. The SGP 2024 AQA included a construction dust assessment which consisted potential impacts on nearby receptors due to construction dust and PM₁₀. As PM_{2.5} forms a proportion of PM₁₀ this also considers PM_{2.5}.

5.1.3. The separate vehicle exhaust emissions assessment presented in the SGP 2024 AQA comprised a screening assessment of the potential impacts associated with additional vehicle movements and associated emissions. Again, this intrinsically considers PM_{2.5} as a proportion of PM₁₀ emissions.

5.1.4. The SGP 2024 AQA therefore considered potential existing and future PM_{2.5} levels, the presence and nature of existing receptors and potential contributions from the Proposed Development in accordance with Question 1.

Interim Guidance Question 2: What actions and / or mitigations have been considered to reduce PM_{2.5} exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of PM_{2.5} and its precursors?

Applicants are advised to explain (with evidence where possible) why each measure was implemented. Or, if no mitigation measures have been implemented, why this was not proposed. Actions can refer to, but are not limited to, the following:

- *Site layout,*
- *The development's design,*
- *Technology used in the construction or installed for use in the development,*
- *Construction and future use of the development.*

Response:

5.1.5. The SGP 2024 AQA set out recommended some standard measures to mitigate construction dust emissions. As noted above in paragraph xx the Environmental Protection team has recommended inclusion of a Condition on any granted planning permission requiring the provision and agreement of a Construction Dust Management Plan (CDMP) prior to the onset of construction works.

5.1.6. As PM_{2.5} (and PM₁₀) form a proportion of 'dust' these measures equally serve to minimise the generation of PM_{2.5} emissions from the proposals.

5.1.7. In addition, as set out in the SGP 2024 AQA, the planning application is supported by a Travel Plan Framework. This sets out a strategy for encouraging users of the site to travel by sustainable modes of transport and the use of low emission vehicles, again thereby reducing emissions of PM_{2.5} (and PM₁₀).

5.1.8. The SGP 2024 AQA therefore outlined measures to reduce emissions of PM_{2.5} from the Proposed Development in accordance with Question 2.

6. Conclusions

- 6.1. This Addendum has reviewed the implications of the revisions to the proposed residential development at Dumers Lane to the findings and conclusions of the previously submitted SGP 2024 AQA. These revisions include a reduction in number of proposed residential units, alteration to the proposed access of Dumers Lane and a revised internal layout.
- 6.2. It is concluded that no amendments are required to the conclusions of the 2024 SGP AQA in light of the revisions to the proposed development. The reduced number of dwellings would be expected to result in a lower number of vehicle movements to / from the Site. It therefore remains concluded that the additional traffic associated with the Proposed Development would not result in any unacceptable impacts on existing or future human health receptors.
- 6.3. No revisions to the original construction dust assessment have been identified as being required. The generation of construction dust can be readily managed and mitigated through the incorporation of standard techniques and it is expected these will be mandated under condition for a Dust Management Plan if permission is granted, and as recommended by the BC Environment Section.
- 6.4. As noted in the SGP 2024 AQA the proposals would result in the introduction of new receptors closer to some of the activities on the industrial estate compared to currently. It is unlikely these activities would result in any significant adverse impacts due to aerial emissions. However, it remains recommended this is subject to further review and a period of monitoring to obtain further information.
- 6.5. The Addendum has also considered the implications of any changes in legislation, guidance and background local air quality on the original SGP 2024 AQA. Where updates and changes to legislation and guidance have been identified, these do not affect the conclusions of the SGP 2024 AQA. The latest data available on local air quality demonstrate on-going improvements and again do not affect the original assessment conclusions.

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Date:

22.08.25