



**DEPARTMENT OF  
OPERATIONS**

Helen Leach  
Bury Council Planning Department

Date 11 April 2024  
Reference CL946.110424.AQ

Dear Helen

**Former Mondi Site, Holcombe Mill, Bridge Street, Ramsbottom, BL0 0BS, Planning Application: 70222 – Air Quality**

I write regarding the above planning application and further to our [initial comments](#) of the 8<sup>th</sup> January 2024 with regards to Air Quality only. The Environment Section has received a copy of the following report:

- Air Quality Assessment, Holcombe Mill, Bridge Street, Ramsbottom, Enzygo Ltd, Reference: MAN.1178.001.AQ.R.001, October 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. Whether planning conditions are recommended.

It is noted that the proposed development comprises the erection of 57 no. dwellings, the retention of a chimney and the demolition of existing buildings, together with engineering operations to create a development platform, public car park, substation, public open space, landscaping, drainage, the layout of internal estate roads and footways and other associated works.

The planning statement for the development notes that each dwelling will have 2 off-street car parking spaces and there will be 47 car parking spaces provided by the public car park.

Please note that 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.

**1. The adequacy of the construction phase assessment**

Assessment: The report states that there is potential for fugitive dust impacts to occur at sensitive locations as a result of demolition, earthworks, construction and trackout activities during the construction phase of the Proposed Development. There are no ecological designations within 50 m of the Site boundary, or 50 m from a route used by construction vehicles on the public highway;



as such this potential receptor is not considered further. Human/sensitive receptors have been identified within 350m of the site boundary, and within 50m of the anticipated trackout. As such a detailed assessment of potential dust impacts was therefore undertaken.

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 assessment produced the following unmitigated dust risk:

| Impact       | Demolition | Earthworks | Construction | Trackout |
|--------------|------------|------------|--------------|----------|
| Dust soiling | Medium     | Medium     | Medium       | High     |
| Human Health | Low        | Low        | Low          | Medium   |

**Mitigation measures:** Fugitive Dust Mitigation Measures are set out in Table 15 of the report. Please ensure that these measures are fully implemented during the construction phase of the development.

The report states that *assuming the relevant mitigation measures outlined in Table 15 are implemented, the residual effect from all dust generating activities is predicted to be negligible and therefore not significant in accordance with the IAQM guidance.*

A Dust Management Plan will be produced to demonstrate how dust emissions will be reduced throughout the construction phase of the development. A copy of this plan will be required.

## **2. The adequacy of the operational phase assessment**

A desk-top study was undertaken to identify worst case sensitive receptor locations adjacent to the affected road network. Receptor locations were plotted where development traffic generation exceeds the EPUK and IAQM.

**Background Concentrations:** Background concentrations from the latest Defra background concentration maps were used. Background concentrations for NO<sub>x</sub>, NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> have been obtained for the years of assessment (2022 – baseline year - and 2025 – the anticipated opening year. *DEFRA background predictions concentrations of NO<sub>2</sub> and PM are not predicted to exceed the relevant AQOs.*

**Model Verification:** The model results have been verified against local diffusion tube data (BU2NO - Ramsbottom Lane). The annual mean concentrations from 2019-2022 were used; all were below the annual mean AQO.

**Modelling Results:** To assess the on-site exposure opening year pollutant concentrations were modelled across the proposed development for 2025. The predicted annual mean concentrations across the site for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> indicate compliance with national AQOs. As such *on-site*

*exposure to annual mean pollutant concentrations was considered not significant and the site is considered suitable for residential use without the requirement of protective mitigation measures.*

*With regards to short term objectives, both 1 hour and 24-hour AQOs are not predicted to exceed short term AQOs at any location across the site.*

The report stated that it is expected the Proposed Development will generate 258 AADT flows during operation. Using this figure a dispersion modelling assessment was undertaken to predict the impact significance at individual receptors on annual mean NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations. This found the significance of impacts was predicted to be negligible at all sensitive receptors. As such it was concluded that *the overall operational phase road traffic emission impacts were determined as not significant.*

The results of operational phase assessment concluded that associated development impacts are predicted to be not significant, as a result of negligible impacts at all locations. Additionally, no exceedances of the AQOs were predicted at any location identified in the assessment.

The above assessment is acceptable to this Section.

**Mitigation for the Operational Phase:** Given the conclusion that the impacts are not significant no measures are required to offset operational impacts. However, the following measures were recommended as principles of good practice to be provided:

- Dwellings with dedicated spaces: One Electric Vehicle charging point for each residential unit;
- Dwellings with unallocated parking: One fast capability EV charging point per 10 parking spaces;
- Secure cycling parking;
- Provision of a detailed travel plan which sets out measures to encourage sustainable means of transport; and
- All gas-fired boilers to meet a minimum standard of <40 mgNO<sub>x</sub>/kWh

Details and validation of the installation of Electric Vehicle Charge Point will be required in due course.

Please note that Bury Council declared a Climate Emergency in July 2019 and has a target of being carbon neutral by 2030.

### **3. Whether planning conditions are 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, and the requirements of the building regulations (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:

- **Air Quality Condition – Electric Vehicle Charge Points:** Prior to occupation the applicant shall provide:
  - 1 no. electric vehicle (EV) charging point (minimum 7kW\*) per unit for dwellings with dedicated parking.
  - Electric vehicle (EV) charging points (minimum 7kW\*) for a minimum of 20% of car parking spaces for dwellings with unallocated parking.
  - Electric vehicle (EV) charging points (minimum 7kW\*) for a minimum of 20% of the proposed parking spaces.

*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.*

*\*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-emission-and-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 111e, 116e, 180e and 192 of the National Planning Policy Framework (December 2023) and Places for Everyone Policy JP-S5 (Clean Air).*

- **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. 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 by the above conditions:

### **Construction Phase**

- (i) A Dust Management Plan to demonstrate how dust emissions will be reduced throughout the construction phase of the development.

### **Operational Phase**

- (ii) Details of the proposed electric vehicle charging points to be installed at each residential property.
- (iii) Evidence of the installation of the electric vehicle charging points, such as photographs.

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

**Sally Shaw**  
**Environmental Protection Officer**

**Privacy Policy:** Please visit [www.bury.gov.uk/privacy](http://www.bury.gov.uk/privacy) to read our recently updated Privacy Policy which explains how Bury Council uses and shares your personal data to give you the best possible experience across our services.