

Air Quality Assessment
Acornfield Road, Kirkby

Client: Acornfield Properties Limited

Reference: 6971r2

Date: 11th October 2023



Report Issue

Report Title: Air Quality Assessment - Acornfield Road, Kirkby

Report Reference: 6971

Report Version	Issue Date	Issued By	Comments
1	14 th August 2023	Jethro Redmore	Draft for comment
2	11 th October 2023	Jethro Redmore	-

Serendipity Labs, 7 Exchange Quay, Salford, M5 3EP

info@red-env.co.uk | 0161 706 0075 | www.red-env.co.uk

This report has been prepared by Redmore Environmental Ltd in accordance with the agreed terms and conditions of appointment. Redmore Environmental Ltd cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.

Executive Summary

Redmore Environmental Ltd was commissioned by Acornfield Properties Limited to undertake an Air Quality Assessment in support of an industrial warehouse development on land off Acornfield Road, Kirkby.

The proposals have the potential to cause air quality impacts as a result of fugitive dust emissions during construction and road traffic exhaust emissions associated with vehicles travelling to and from the site during operation. As such, an Air Quality Assessment was undertaken in order to determine baseline conditions and consider potential effects as a result of the scheme.

Potential construction phase air quality impacts from fugitive dust emissions were assessed as a result of earthworks, construction and trackout activities. It is considered that the use of good practice control measures would provide suitable mitigation for a development of this size and nature and reduce potential impacts to an acceptable level.

During the operational phase of the development there is the potential for air quality impacts as a result of traffic exhaust emissions associated with vehicles travelling to and from the site. These were assessed against the relevant screening criteria. Due to the relatively low number of anticipated vehicle trips associated with the proposals, road traffic impacts were not predicted to be significant.

Based on the assessment results, air quality factors are not considered a constraint to planning consent for the development.

Table of Contents

1.0	INTRODUCTION	1
1.1	Background	1
1.2	Site Location and Context	1
2.0	LEGISLATION AND POLICY	2
2.1	Legislation	2
2.2	Local Air Quality Management	4
2.3	Dust	4
2.4	National Planning Policy	5
2.5	National Planning Practice Guidance	6
2.6	Local Planning Policy	7
3.0	METHODOLOGY	9
3.1	Introduction	9
3.2	Construction Phase Assessment	9
	Step 1	10
	Step 2	10
	Step 3	15
	Step 4	16
3.3	Operational Phase Assessment	16
4.0	BASELINE	18
4.1	Introduction	18
4.2	Local Air Quality Management	18
4.3	Air Quality Monitoring	18
4.4	Background Pollutant Concentrations	19
5.0	ASSESSMENT	20
5.1	Introduction	20
5.2	Construction Phase Assessment	20
	Step 1	20
	Step 2	22
	Step 3	24
	Step 4	25
5.3	Operational Phase Assessment	26
6.0	CONCLUSION	27
7.0	ABBREVIATIONS	28

Appendix

Appendix 1 - Curricula Vitae

1.0 INTRODUCTION

1.1 Background

- 1.1.1 Redmore Environmental Ltd was commissioned by Acornfield Properties Limited to undertake an Air Quality Assessment in support of an industrial warehouse development on land off Acornfield Road, Kirkby.
- 1.1.2 The proposals have the potential to cause air quality impacts as a result of fugitive dust emissions during construction and road traffic exhaust emissions associated with vehicles travelling to and from the site during operation. As such, an Air Quality Assessment was undertaken in order to determine baseline conditions and consider potential effects as a result of the scheme.

1.2 Site Location and Context

- 1.2.1 The site is located on land off Acornfield Road, Kirkby, at approximate National Grid Reference (NGR): 343625, 398590. Reference should be made to Figure 1 for a site location plan.
- 1.2.2 The proposals comprise the construction of four industrial warehouse units with associated infrastructure.
- 1.2.3 The development has the potential to cause impacts at sensitive locations. These may include fugitive dust emissions associated with construction works and road traffic exhaust emissions from vehicles travelling to and from the site during the operational phase. An Air Quality Assessment was therefore undertaken in order to determine baseline conditions and consider potential air quality effects as a result of the proposals. This is detailed in the following report.

2.0 LEGISLATION AND POLICY

2.1 Legislation

2.1.1 The Air Quality Standards Regulations (2010) and subsequent amendments include Air Quality Limit Values (AQLVs) for the following pollutants:

- Nitrogen dioxide (NO₂);
- Sulphur dioxide;
- Lead;
- Particulate matter with an aerodynamic diameter of less than 10µm (PM₁₀);
- Particulate matter with an aerodynamic diameter of less than 2.5µm (PM_{2.5});
- Benzene; and,
- Carbon monoxide.

2.1.2 Air Quality Target Values have also been provided for several additional pollutants. It should be noted that the AQLV for PM_{2.5} stated in the Air Quality Standards Regulations (2010) was amended in the Environment (Miscellaneous Amendments) (EU Exit) Regulations (2020).

2.1.3 The Air Quality Strategy (AQS) was produced by the Department for Environment, Food and Rural Affairs (DEFRA) and published in April 2023¹. The document contains standards, objectives and measures for improving ambient air quality, including a number of Air Quality Objectives (AQOs). These are maximum ambient pollutant concentrations that are not to be exceeded either without exception or with a permitted number of exceedences over a specified timescale. These are generally in line with the AQLVs, although the requirements for the determination of compliance vary.

2.1.4 The Environmental Improvement Plan 2023² was published in January 2023, providing long term and Interim Targets in order to reduce population exposure to PM_{2.5}. The concentration target for 2040 was subsequently adopted in the Environmental Targets (Fine Particulate Matter) (England) Regulations (2023).

¹ AQS: Framework for Local Authority Delivery, DEFRA, 2023.

² Environmental Improvement Plan 2023, DEFRA, 2023.

2.1.5 Table 1 presents the AQOs and Interim Target for pollutants considered within this assessment.

Table 1 Air Quality Objectives/Interim Target

Pollutant	Air Quality Objective/Interim Target	
	Concentration ($\mu\text{g}/\text{m}^3$)	Averaging Period
NO ₂	40	Annual mean
	200	1-hour mean, not to be exceeded on more than 18 occasions per annum
PM ₁₀	40	Annual mean
	50	24-hour mean, not to be exceeded on more than 35 occasions per annum
PM _{2.5}	12 ^(a)	Annual mean

Note: (a) Interim Target to be achieved by end of January 2028.

2.1.6 Table 2 summarises the advice provided in DEFRA guidance³ on where the AQOs for pollutants considered within this report apply.

Table 2 Examples of Where the Air Quality Objectives Apply

Averaging Period	Objective Should Apply At	Objective Should Not Apply At
Annual mean	All locations where members of the public might be regularly exposed Building façades of residential properties, schools, hospitals, care homes etc.	Building façades of offices or other places of work where members of the public do not have regular access Hotels, unless people live there as their permanent residence Gardens of residential properties Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term
24-hour mean	All locations where the annual mean objective would apply, together with hotels Gardens of residential properties	Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term

³ Local Air Quality Management Technical Guidance (TG22), DEFRA, 2022.

Averaging Period	Objective Should Apply At	Objective Should Not Apply At
1-hour mean	All locations where the annual mean and 24 and 8-hour mean objectives apply. Kerbside sites (for example, pavements of busy shopping streets) Those parts of car parks, bus stations and railway stations etc which are not fully enclosed, where members of the public might reasonably be expected to spend one hour or more Any outdoor locations where members of the public might reasonably be expected to spend one hour or longer	Kerbside sites where the public would not be expected to have regular access

2.2 **Local Air Quality Management**

2.2.1 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 comparing present and likely future pollutant concentrations against the AQOs. If it is predicted that levels at locations of relevant exposure, as summarised in Table 2, are likely to be exceeded, the LA is required to declare an Air Quality Management Area (AQMA). For each AQMA the LA is required to produce an Air Quality Action Plan (AQAP), the objective of which is to reduce pollutant concentrations in pursuit of the AQOs.

2.3 **Dust**

2.3.1 The main requirements with respect to dust control from industrial or trade premises not regulated under the Environmental Permitting (England and Wales) Regulations (2016) and subsequent amendments, such as construction sites, is that provided in Section 79 of Part III of the Environmental Protection Act (1990). The Act defines nuisance as:

"any dust, steam, smell or other effluvia arising on industrial, trade or business premises and being prejudicial to health or a nuisance."

2.3.2 Enforcement of the Act, in regard to nuisance, is currently under the jurisdiction of the local Environmental Health Department, whose officers are deemed to provide an independent evaluation of nuisance. If the LA is satisfied that a statutory nuisance exists, or is likely to occur or happen again, it must serve an Abatement Notice under Part III of

the Environmental Protection Act (1990). The only defence is to show that the process to which the nuisance has been attributed and its operation are being controlled according to best practicable means.

2.4 National Planning Policy

2.4.1 The revised National Planning Policy Framework⁴ (NPPF) was published in September 2023 and sets out the Government's planning policies for England and how these are expected to be applied.

2.4.2 The purpose of the planning system is to contribute to the achievement of sustainable development. In order to ensure this, the NPPF recognises three overarching objectives, including the following of relevance to air quality:

"c) an environmental objective - to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

2.4.3 Chapter 15 of the NPPF details objectives in relation to conserving and enhancing the natural environment. It states that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

[...]

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality [...]."

⁴ NPPF, Ministry of Housing, Communities and Local Government, 2023.

- 2.4.4 The NPPF specifically recognises air quality as part of delivering sustainable development and 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 and 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 and 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."

- 2.4.5 The implications of the NPPF have been considered throughout this assessment.

2.5 National Planning Practice Guidance

- 2.5.1 The National Planning Practice Guidance⁵ (NPPG) web-based resource was launched by the Department for Communities and Local Government on 6th March 2014 and updated on 1st November 2019 to support the NPPF and make it more accessible. The air quality pages are summarised under the following headings:

1. What air quality considerations does planning need to address?
2. What is the role of plan-making with regard to air quality?
3. Are air quality concerns relevant to neighbourhood planning?
4. What information is available about air quality?
5. When could air quality considerations be relevant to the development management process?
6. What specific issues may need to be considered when assessing air quality impacts?
7. How detailed does an air quality assessment need to be?
8. How can an impact on air quality be mitigated?

⁵ <https://www.gov.uk/guidance/air-quality--3>.

2.5.2 These were reviewed and the relevant guidance considered as necessary throughout the undertaking of this assessment.

2.6 Local Planning Policy

2.6.1 The Knowsley Local Plan: Core Strategy⁶ was adopted by Knowsley Metropolitan Borough Council (KMBC) on 26th January 2016. Review of the document indicated the following policy of relevance to this report:

"Policy CS2

Development Principles

1) New development in Knowsley and the preparation of subsequent stages of the Local Plan will be expected to support the following development principles:

Principal 4: Recognise environmental limits, protect and enhance environmental assets, enhance local character and promote air quality of place by:

e) Mitigating potential negative impacts of traffic growth and road traffic on highway safety, air quality, noise and health;

[...]

J) Minimising negative impact upon flood risk, air quality, water quality, land quality, soil quality and noise or vibration levels and ensuring negative impacts are appropriately mitigated."

2.6.2 The Knowsley Replacement Unitary Development Plan (UDP)⁷ was adopted in June 2006. Under the transitional arrangements for moving to the Local Plan system, 39 UDP Policies have been saved, these include the following in relation to air quality:

"Policy ENV1: Control of Pollution in New Development

⁶ Knowsley Local Plan: Core Strategy, KMBC, 2016.

⁷ Knowsley Replacement UDP, KMBC, 2006.

Development will not be permitted which is likely to cause significant harm to amenity as a result of impact on any of the following:

a) Air quality;

[...]"

2.6.3 The above policies have been taken into consideration throughout the undertaking of this assessment.

3.0 METHODOLOGY

3.1 Introduction

3.1.1 The proposed development has the potential to cause adverse impacts as a result of construction phase dust emissions and exhaust emissions from vehicles travelling to and from the site during the operational phase. These were assessed in accordance with the following methodology.

3.2 Construction Phase Assessment

3.2.1 There is the potential for fugitive dust emissions to occur as a result of construction phase activities. These have been assessed in accordance with the methodology outlined within the Institute of Air Quality Management (IAQM) document 'Guidance on the Assessment of Dust from Demolition and Construction V2.1'⁸.

3.2.2 Activities on the proposed construction site have been divided into three types to reflect their different potential impacts. These are:

- Earthworks;
- Construction; and,
- Trackout.

3.2.3 The potential for dust emissions was assessed for each activity that is likely to take place and considered three separate dust effects:

- Annoyance due to dust soiling;
- Harm to ecological receptors; and,
- The risk of health effects due to a significant increase in exposure to PM₁₀.

3.2.4 The assessment steps are detailed below.

⁸ Guidance on the Assessment of Dust from Demolition and Construction V2.1, IAQM, 2023.

Step 1

3.2.5 Step 1 screens the requirement for a more detailed assessment. Should human receptors be identified within 350m from the boundary or 50m from the construction vehicle route up to 500m from the site entrance, then the assessment proceeds to Step 2. Additionally, should ecological receptors be identified within 50m of the site or the construction vehicle route up to 500m from the site entrance, then the assessment also proceeds to Step 2.

3.2.6 Should sensitive receptors not be present within the relevant distances then **negligible** impacts would be expected and further assessment is not necessary.

Step 2

3.2.7 Step 2 assesses the risk of potential dust impacts. A site is allocated a risk category based on two factors:

- The scale and nature of the works, which determines the magnitude of dust arising as: small, medium or large (Step 2A); and,
- The sensitivity of the area to dust impacts, which can be defined as low, medium or high sensitivity (Step 2B).

3.2.8 The two factors are combined in Step 2C to determine the risk of dust impacts without mitigation applied.

3.2.9 Step 2A defines the potential magnitude of dust emission through the construction phase. The relevant criteria are summarised in Table 3.

Table 3 Construction Dust - Magnitude of Emission

Magnitude	Activity	Criteria
Large	Earthworks	• Total site area greater than 110,000m² • Potentially dusty soil type (e.g. clay, which will be prone to suspension when dry due to small particle size) • More than 10 heavy earth moving vehicles active at any one time • Formation of bunds greater than 6m in height

Magnitude	Activity	Criteria
	Construction	- Total building volume greater than 75,000m³ - On site concrete batching - Sandblasting
	Trackout	- More than 50 Heavy Duty Vehicle (HDV) trips per day - Potentially dusty surface material (e.g. high clay content) - Unpaved road length greater than 100m
Medium	Earthworks	- Total site area 18,000m² to 110,000m² - Moderately dusty soil type (e.g. silt) 5 to 10 heavy earth moving vehicles active at any one time - Formation of bunds 3m to 6m in height
	Construction	- Total building volume 12,000m³ to 75,000m³ - Potentially dusty construction material (e.g. concrete) - On site concrete batching
	Trackout	20 to 50 HDV trips per day - Moderately dusty surface material (e.g. high clay content) - Unpaved road length 50m to 100m
Small	Earthworks	- Total site area less than 18,000m² - Soil type with large grain size (e.g. sand) - Less than 5 heavy earth moving vehicles active at any one time - Formation of bunds less than 3m in height
	Construction	- Total building volume less than 12,000m³ - Construction material with low potential for dust release (e.g. metal cladding or timber)
	Trackout	- Less than 20 HDV trips per day - Surface material with low potential for dust release - Unpaved road length less than 50m

3.2.10 Step 2B defines the sensitivity of the area around the development to potential dust impacts. The influencing factors are shown in Table 4.

Table 4 Construction Dust - Examples of Factors Defining Sensitivity of an Area

Receptor Sensitivity	Examples	
	Human Receptors	Ecological Receptors
High	• Users expect high levels of amenity • High aesthetic or value property • People expected to be present continuously for extended periods of time • Locations where members of the public are exposed over a time period relevant to the AQO for PM₁₀. e.g. residential properties, hospitals, schools and residential care homes	• Internationally or nationally designated site e.g. Special Area of Conservation
Medium	• Users would expect to enjoy a reasonable level of amenity • Aesthetics or value of their property could be diminished by soiling • 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 e.g. parks and places of work	• Nationally designated site e.g. Sites of Special Scientific Interest
Low	• Enjoyment of amenity would not reasonably be expected • Property would not be expected to be diminished in appearance • Transient exposure, where people would only be expected to be present for limited periods. e.g. public footpaths, playing fields, shopping streets, farmland, short term car parks and roads	• Locally designated site e.g. Local Nature Reserve

3.2.11 The guidance also provides the following factors to consider when determining the sensitivity of an area to potential dust impacts:

- Any history of dust generating activities in the area;
- The likelihood of concurrent dust generating activity on nearby sites;
- Any pre-existing screening between the source and receptors;
- Any conclusions drawn from analysing local meteorological data which accurately represent the area; and if relevant the season during which works will take place;
- Any conclusions drawn from local topography;
- Duration of the potential impact, as a receptor may become more sensitive over time; and,

- Any known specific receptor sensitivities which go beyond the classifications given in the document.

3.2.12 These factors were considered in the undertaking of this assessment.

3.2.13 The criteria for determining the sensitivity of the area to dust soiling effects on people and property is summarised in Table 5.

Table 5 Construction Dust - Sensitivity of the Area to Dust Soiling Effects on People and Property

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

3.2.14 Table 6 outlines the criteria for determining the sensitivity of the area to human health impacts.

Table 6 Construction Dust - Sensitivity of the Area to Human Health Impacts

Receptor Sensitivity	Background Annual Mean PM ₁₀ Concentration	Number of Receptors	Distance from the Source (m)				
			Less than 20	Less than 50	Less than 100	Less than 200	Less than 350
High	Greater than 32µg/m ³	More than 100	High	High	High	Medium	Low
		10 - 100	High	High	Medium	Low	Low
		1 - 10	High	Medium	Low	Low	Low
	28 - 32µg/m ³	More than 100	High	High	Medium	Low	Low
		10 - 100	High	Medium	Low	Low	Low
		1 - 10	High	Medium	Low	Low	Low

Receptor Sensitivity	Background Annual Mean PM ₁₀ Concentration	Number of Receptors	Distance from the Source (m)					
			Less than 20	Less than 50	Less than 100	Less than 200	Less than 350	
	24 - 28µg/m³	More than 100	High	Medium	Low	Low	Low	
		10 - 100	High	Medium	Low	Low	Low	
		1 - 10	Medium	Low	Low	Low	Low	
	Less than 24µg/m³	More than 100	Medium	Low	Low	Low	Low	
		10 - 100	Low	Low	Low	Low	Low	
		1 - 10	Low	Low	Low	Low	Low	
	Medium	Greater than 32µg/m³	More than 10	High	Medium	Low	Low	Low
			1 - 10	Medium	Low	Low	Low	Low
		28 - 32µg/m³	More than 10	Medium	Low	Low	Low	Low
1 - 10			Low	Low	Low	Low	Low	
24 - 28µg/m³		More than 10	Low	Low	Low	Low	Low	
		1 - 10	Low	Low	Low	Low	Low	
Less than 24µg/m³		More than 10	Low	Low	Low	Low	Low	
		1 - 10	Low	Low	Low	Low	Low	
Low		-	1 or more	Low	Low	Low	Low	Low

3.2.15 Table 7 outlines the criteria for determining the sensitivity of the area to ecological impacts.

Table 7 Construction Dust - Sensitivity of the Area to Ecological Impacts

Receptor Sensitivity	Distance from the Source (m)	
	Less than 20	Less than 50
High	High	Medium
Medium	Medium	Low

Receptor Sensitivity	Distance from the Source (m)	
	Less than 20	Less than 50
Low	Low	Low

3.2.16 Step 2C combines the dust emission magnitude with the sensitivity of the area to determine the risk of unmitigated impacts. Table 8 outlines the risk category from earthworks and construction activities.

Table 8 Construction Dust - Dust Risk Category from Earthworks and Construction Activities

Receptor Sensitivity	Dust Emission Magnitude		
	Large	Medium	Small
High	High	Medium	Low
Medium	Medium	Medium	Low
Low	Low	Low	Negligible

3.2.17 Table 9 outlines the risk category from trackout activities.

Table 9 Construction Dust - Dust Risk Category from Trackout Activities

Receptor Sensitivity	Dust Emission Magnitude		
	Large	Medium	Small
High	High	Medium	Low
Medium	Medium	Low	Negligible
Low	Low	Low	Negligible

Step 3

3.2.18 Step 3 requires the identification of site specific mitigation measures within the IAQM guidance⁹ to reduce potential dust impacts based upon the relevant risk categories identified in Step 2. For sites with **negligible** risk, mitigation measures beyond those

⁹ Guidance on the Assessment of Dust from Demolition and Construction V2.1, IAQM, 2023.

required by legislation are not required. However, additional controls may be applied as part of good practice.

Step 4

3.2.19 Once the risk of dust impacts has been determined and the appropriate mitigation measures identified, the final step is to determine the significance of any residual impacts. For almost all construction activity, the aim should be to control effects through the use of effective mitigation. Experience shows that this is normally possible. Hence the residual effect will normally be **not significant**.

3.2.20 The determination of significance relies on professional judgement and reasoning should be provided as far as practicable. The IAQM guidance suggests the provision of details of the assessor's qualifications and experience. These are provided in Appendix 1.

3.3 Operational Phase Assessment

3.3.1 The development has the potential to increase concentrations of NO₂, PM₁₀ and PM_{2.5} as a result of road traffic exhaust emissions associated with vehicles travelling to and from the site during the operational phase. A screening assessment was therefore undertaken using the criteria contained within the IAQM 'Land-Use Planning & Development Control: Planning for Air Quality'¹⁰ guidance to determine the potential for trips generated by the development to affect local air quality.

3.3.2 The following criteria are provided to help establish when an assessment of potential impacts on the local area is likely to be considered necessary:

- A change of Light Duty Vehicle (LDV) flows of more than 100 Annual Average Daily Traffic (AADT) within or adjacent to an AQMA or more than 500 AADT elsewhere;
- A change of HDV flows of more than 25 AADT within or adjacent to an AQMA or more than 100 AADT elsewhere;
- Realignment of roads where the change is 5m or more and the road is within an AQMA; or,

¹⁰ Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

- Introduction of a new junction or removal of an existing junction near to relevant receptors.

3.3.3 Should these criteria not be met, then the IAQM guidance¹¹ considers air quality impacts associated with a scheme to be **not significant** and no further assessment is required.

3.3.4 Should screening of the relevant data indicate that any of the above criteria are met, then potential impacts at sensitive receptor locations can be assessed by calculating the change in pollutant concentrations as a result of the proposed development. The significance of predicted impacts can then be determined in accordance with the methodology outlined in the IAQM guidance¹².

¹¹ Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

¹² Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

4.0 **BASELINE**

4.1 **Introduction**

4.1.1 Existing air quality conditions in the vicinity of the proposed development site were identified in order to provide a baseline for assessment. These are detailed in the following Sections.

4.2 **Local Air Quality Management**

4.2.1 As required by the Environment Act (1995), as amended by the Environment Act (2021) KMBC has undertaken Review and Assessment of air quality within their area of jurisdiction. This process has indicated that all pollutants considered within the AQS are currently below the relevant AQOs. As such, no AQMAs have been designated within the borough.

4.3 **Air Quality Monitoring**

4.3.1 Monitoring of pollutant concentrations is undertaken by KMBC throughout their area of jurisdiction. Recent results recorded in the vicinity of the development are shown in Table 10.

Table 10 Monitoring Results

Monitoring Site		Annual Mean NO ₂ Concentration (µg/m ³)		
		2019	2020	2021
K10a, K10b	Outside 19 Moorgate Road (A5207)	29.4	24.1	26.6

4.3.2 As shown in Table 10, annual mean NO₂ concentrations were below the relevant AQO at K10 during recent years. Reference should be made to Figure 2 for a map of the survey position.

4.3.3 KMBC do not undertake PM₁₀ or PM_{2.5} monitoring within the vicinity of the site.

4.4 **Background Pollutant Concentrations**

- 4.4.1 Predictions of background pollutant concentrations on a 1km by 1km grid basis have been produced by DEFRA for the entire of the UK to assist LAs in their Review and Assessment of air quality. The proposed development site is located in grid square NGR: 343500, 398500. Data for this location was downloaded from the DEFRA website¹³ for the purpose of this assessment and is summarised in Table 11.

Table 11 Background Pollutant Concentrations

Pollutant	Predicted 2023 Background Pollutant Concentration (µg/m ³)
NO ₂	14.31
PM ₁₀	11.30
PM _{2.5}	7.61

- 4.4.2 As shown in Table 11, predicted background NO₂, PM₁₀ and PM_{2.5} concentrations are below the relevant AQOs and Interim Target at the development site.

¹³ <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018>.

5.0 **ASSESSMENT**

5.1 **Introduction**

5.1.1 There is the potential for air quality impacts as a result of the construction and operation of the proposed development. These are assessed in the following Sections.

5.2 **Construction Phase Assessment**

Step 1

- 5.2.1 The undertaking of activities such as excavation, ground works, cutting, construction, concrete batching and storage of materials has the potential to result in fugitive dust emissions throughout the construction phase. Vehicle movements both on-site and on the local road network also have the potential to result in the re-suspension of dust from haul roads and highway surfaces.
- 5.2.2 The potential for impacts at sensitive locations depends significantly on local meteorology during the undertaking of dust generating activities, with the most significant effects likely to occur during dry and windy conditions.
- 5.2.3 Receptors sensitive to potential dust impacts during earthworks and construction were identified from a desk-top study of the area up to 350m from the development boundary. These are summarised in Table 12.

Table 12 Earthworks and Construction Dust Sensitive Receptors

Distance from Site Boundary (m)	Approximate Number of Human Receptors	Approximate Number of Ecological Receptors
Up to 20	1 - 10	0
Up to 50	10 - 100	0
Up to 100	10 - 100	-
Up to 350	More than 100	-

- 5.2.4 Receptors sensitive to potential dust impacts from trackout were identified from a desk-top study of the area up to 50m from the road network within 500m of the site access. These are summarised in Table 13.

Table 13 Trackout Dust Sensitive Receptors

Distance from Site Access Route (m)	Approximate Number of Human Receptors	Approximate Number of Ecological Receptors
Up to 20	10 - 100	0
Up to 50	More than 100	0

- 5.2.5 There are no ecological receptors within 50m of the development boundary or the access route within 500m of the site entrance. As such, ecological impacts have not been assessed further within this report.
- 5.2.6 Based on the criteria shown in Table 4, the sensitivity of the receiving environment to potential dust impacts was determined as **medium**. This was because the identified receptors included places of work.
- 5.2.7 The sensitivity of the receiving environment to specific potential dust impacts, based on the criteria shown in Section 3.2, is shown in Table 14.

Table 14 Sensitivity of the Surrounding Area

Potential Impact	Sensitivity of the Surrounding Area		
	Earthworks	Construction	Trackout
Dust Soiling	Medium	Medium	Medium
Human Health	Low	Low	Low

- 5.2.8 The potential risk of dust impacts at the identified receptors is considered in the following Sections.

Step 2

Earthworks

5.2.9 Earthworks will primarily involve excavating material, haulage, tipping and stockpiling, as well as site levelling and landscaping. The area of the proposed development site is less than 18,000m². In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from earthworks is therefore **small**.

5.2.10 Table 14 indicates the sensitivity of the area to dust soiling effects on people and property is **medium**. In accordance with the criteria outlined in Table 8, the development is considered to be a **low** risk site for dust soiling as a result of earthworks.

5.2.11 Table 14 indicates the sensitivity of the area to human health impacts is **low**. In accordance with the criteria outlined in Table 8, the development is considered to be a **low** risk site for human health impacts as a result of earthworks.

Construction

5.2.12 Due to the size of the development, the total building volume is likely to be less than 12,000m³. In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from construction is therefore **small**.

5.2.13 Table 14 indicates the sensitivity of the area to dust soiling effects on people and property is **medium**. In accordance with the criteria outlined in Table 8, the development is considered to be a **low** risk site for dust soiling as a result of construction activities.

5.2.14 Table 14 indicates the sensitivity of the area to human health impacts is **low**. In accordance with the criteria outlined in Table 8, the development is considered to be a **negligible** risk site for human health impacts as a result of construction activities.

Trackout

5.2.15 Based on the site area and existing hard standing, it is anticipated that the unpaved road length will be less than 50m. In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from trackout is therefore **small**.

5.2.16 Table 14 indicates the sensitivity of the area to dust soiling effects to people and property is **medium**. In accordance with the criteria outlined in Table 9, the development is considered to be a **negligible** risk site for dust soiling as a result of trackout.

5.2.17 Table 14 indicates the sensitivity of the area to human health impacts is **low**. In accordance with the criteria outlined in Table 9, the development is considered to be a **negligible** risk site for human health impacts as a result of trackout.

Summary of the Risk of Dust Effects

5.2.18 A summary of the risk from each dust generating activity is provided in Table 15.

Table 15 Summary of Potential Unmitigated Dust Risks

Potential Impact	Risk		
	Earthworks	Construction	Trackout
Dust Soiling	Low	Low	Negligible
Human Health	Low	Negligible	Negligible

5.2.19 As indicated in Table 15, the potential risk of dust soiling is **low** from earthworks and construction and **negligible** from trackout. The potential risk of human health impacts is **low** from earthworks and **negligible** from construction and trackout.

5.2.20 It should be noted that the potential for impacts depends significantly on the distance between the dust generating activity and receptor location. Risk was predicted based on a worst-case scenario of works being undertaken at the site boundary closest to each sensitive area. Therefore, actual risk is likely to be lower than that predicted during the majority of the construction phase.

Step 3

5.2.21 The IAQM guidance¹⁴ provides potential mitigation measures to reduce impacts as a result of fugitive dust emissions during the construction phase. These have been adapted for the development site as summarised in Table 16. These may be reviewed prior to the commencement of construction works and incorporated into a Construction Environmental Management Plan or similar if required by the LA.

Table 16 Fugitive Dust Emission Mitigation Measures

Issue	Control Measure
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 • Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the LA
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 to monitor compliance with the DMP, 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

¹⁴ Guidance on the Assessment of Dust from Demolition and Construction V2.1, IAQM, 2023.

Issue	Control Measure
Site preparation	- Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible - 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 - 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 - 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 - Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials
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	Avoid bonfires or burning of waste materials
Construction	- Avoid scabbling (roughening of concrete surfaces) if possible - Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out
Trackout	Ensure vehicles entering and leaving site are covered to prevent escape of materials

Step 4

5.2.22 Assuming the relevant mitigation measures outlined in Table 16 are implemented, the residual impact from all dust generating activities is predicted to be **not significant**, in accordance with the IAQM guidance¹⁵.

¹⁵ Guidance on the Assessment of Dust from Demolition and Construction V2.1, IAQM, 2023.

5.3 Operational Phase Assessment

- 5.3.1 Any traffic movements associated with the proposals will generate exhaust emissions on the local and regional road networks. Information provided by SK Transport Planning Limited, the Transport Consultant for the project, indicated that the development is anticipated to generate approximately 99 daily vehicle movements, of which 16 will be HDVs.
- 5.3.2 Based on the above information, it is not predicted that the proposal will result in an increase in LDV AADT flows of more than 500 or HDV AADT flows of more than 100 on any individual road link. Additionally, the development does not include significant highway realignment or the introduction of a junction. As such, potential air quality impacts associated with operational phase road vehicle exhaust emissions are predicted to be **not significant**, in accordance with the IAQM¹⁶ screening criteria shown in Section 3.3.

¹⁶ Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

6.0 CONCLUSION

- 6.1.1 Redmore Environmental Ltd was commissioned by Acornfield Properties Limited to undertake an Air Quality Assessment in support of an industrial warehouse development on land off Acornfield Road, Kirkby.
- 6.1.2 The proposed development has the potential to cause air quality impacts during the construction and operational phases. As such, an Air Quality Assessment was required in order to determine baseline conditions at the site and assess potential air quality effects as a result of the scheme.
- 6.1.3 During the construction phase of the development there is the potential for air quality impacts as a result of fugitive dust emissions from the site. These were assessed in accordance with the IAQM methodology. Assuming good practice dust control measures are implemented, the residual significance of potential air quality impacts from dust generated by earthworks, construction and trackout activities was predicted to be **not significant**.
- 6.1.4 During the operational phase of the development there is the potential for air quality impacts as a result of traffic exhaust emissions associated with vehicles travelling to and from the site. These were assessed against the screening criteria provided within the IAQM¹⁷ guidance. Due to the relatively low number of anticipated vehicle trips associated with the proposals, road traffic exhaust impacts were predicted to be **not significant**.
- 6.1.5 Based on the assessment results, air quality factors are not considered a constraint to planning consent for the development.

¹⁷ Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

7.0 **ABBREVIATIONS**

AADT	Annual Average Daily Traffic
AQAP	Air Quality Action Plan
AQLV	Air Quality Limit Value
AQMA	Air Quality Management Area
AQO	Air Quality Objective
AQS	Air Quality Strategy
DEFRA	Department for Environment, Food and Rural Affairs
DMP	Dust Management Plan
HDV	Heavy Duty Vehicle
IAQM	Institute of Air Quality Management
KMBC	Knowsley Metropolitan Borough Council
LA	Local Authority
LAQM	Local Air Quality Management
LDV	Light Duty Vehicle
NGR	National Grid Reference
NO ₂	Nitrogen dioxide
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
PM ₁₀	Particulate matter with an aerodynamic diameter of less than 10µm
PM _{2.5}	Particulate matter with an aerodynamic diameter of less than 2.5µm

Figures



Legend



Site Boundary

Title

Figure 1 - Site Location

Project

Air Quality Assessment
Acornfield Road, Kirkby

Project Reference

6971

Client

Acornfield Properties Limited

Contains Ordnance Survey Data
© Crown Copyright and Database Act 2022



www.red-env.co.uk | 0161 7060075



Legend



Site Boundary



Monitor

Title

Figure 2 - Monitoring Location

Project

Air Quality Assessment
Acornfield Road, Kirkby

Project Reference

6971

Client

Acornfield Properties Limited

Contains Ordnance Survey Data
© Crown Copyright and Database Act 2022



www.red-env.co.uk | 0161 7060075

Appendix 1 - Curricula Vitae

KEY EXPERIENCE:

Jethro is a Chartered Environmentalist and Director of Redmore Environmental with specialist experience in the air quality and odour sectors. His key capabilities include:

- Production and management of Air Quality, Dust and Odour Assessments for a wide-range of clients from the retail, residential, infrastructure, commercial and industrial sectors.
- Production and co-ordination of Environmental Permit applications for a variety of industrial sectors.
- Detailed dispersion modelling of road vehicle and industrial emissions using ADMS-Roads, ADMS-5, AERMOD-PRIME and BREEZE-ROADS. Studies have included impact assessment of ground level pollutant and odour concentrations and assessment of suitability of development sites for proposed end-use.
- Project management and co-ordination of Environmental Impact Assessments and scoping reports for developments throughout the UK.
- Provision of expert witness services at Planning Inquiries.
- Design and project management of pollutant monitoring campaigns.
- Co-ordination and management of large-scale multi-disciplinary projects and submissions.
- Provision of expert advice to local government and international environmental bodies, as well as involvement in production of industry guidance.

SELECT PROJECTS SUMMARY:

Industrial

Shanks Waste Management - Odour Assessments of two waste management facilities to support Environmental Permit Applications.

Tatweer Petroleum - dispersion modelling of Bahrain oil field.

Doha South Sewage Treatment Works - AQA for works extension in Qatar.

IRIS Environmental Appraisal Report Reviews, Isle of Man Government - odour assessment reviews.

Lankem, Greater Manchester - Environmental Permit Application for chemical manufacturing plant.

Newport Docks Bulk Drying, Pelleting and CHP Facility - air quality EIA for gas CHP.

Springshades, Leicester - Environmental Permit Variation Application for textile manufacturing plant.

Valspar, Chester - Odour Assessment and production of Odour Management Plan for a paint manufacturing plant in response to neighbour complaints.

Agrivert - dispersion modelling of odour and CHP emissions from numerous AD plants.

James Cropper Paper Mill, Cumbria - air quality EIA, Environmental Permit Variation and Human Health Risk Assessment for new biomass boiler adjacent to SSSI.

Rigg Approach, Leyton - Air Quality Assessment in support of waste transfer site.

Lynchford Lane Waste Transfer Station - biomass facility energy recovery plant.

Barnes Wallis Heat and Power, Cobham - biomass facility adjacent to AQMA.

Residential

Wood St Mill, Bury - residential development adjacent to scrap metal yard.

Hyams Lane, Holbrook - Odour Assessment to support residential development adjacent to sewage works.

North Wharf Gardens, London - peer review of EIA undertaken for large residential development.

Loxford Road, Alford - Air Quality EIA for residential development, included consideration of impacts from associated package sewage works

Elephant and Castle Leisure Centre - baseline AQA for redevelopment.

Carr Lodge, Doncaster - EIA for large residential development.

Queensland Road, Highbury - residential scheme including CHP.

Bicester Ecotown - dispersion modelling of energy centre.

Castleford Growth Delivery Plan - baseline air quality constraints assessment for town redevelopment.

York St, Bury - residential development adjacent to AQMA.

Temple Point Leeds - residential development adjacent to M1.

Commercial and Retail

Etihad Stadium - Air Quality EIA for the extension to the capacity of the Etihad Stadium, Manchester.

Wakefield College - redevelopment of city centre campus in AQMA.

Manchester Airport Cargo Shed - commercial development.

Manchester Airport Apron Extension - EIA including aircraft emission modelling.

National Youth Theatre, Islington - redevelopment to provide new arts space and accommodation.