

Air Quality Assessment
Gaywood Green, Kirkby

Client: Livv Housing Group

Reference: 6923r2

Date: 5th September 2024



Report Issue

Report Title: Air Quality Assessment - Gaywood Green, Kirkby

Report Reference: 6923

Field	Report Version			
	1	2	3	4
Prepared by	Natasha Jones	Alec Barnett		
Position	Graduate Air Quality Consultant	Air Quality Consultant		
Reviewed by	Megan Hall	Megan Hall		
Position	Graduate Air Quality Consultant	Graduate Air Quality Consultant		
Authorised by	Emily Macey	Emily Macey		
Position	Senior Air Quality Consultant	Senior Air Quality Consultant		
Date of Issue	16 th February 2024	5 th September 2024		
Comments	Draft for comment	Updated construction phase assessment		

Serendipity Labs, Building 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 Livv Housing Group to undertake an Air Quality Assessment in support of a planning application for a residential development at Gaywood Green, Kirkby.

The development proposals have the potential to cause air quality impacts. As such, an Air Quality Assessment was undertaken to:

- Assess potential impacts associated with fugitive dust emissions during the construction phase of the proposed development;
- Assess potential impacts associated with road transport emissions during the operational phase of the proposed development; and,
- Identify the requirement for mitigation measures.

Potential construction phase air quality impacts from fugitive dust emissions were assessed as a result of demolition, earthworks, construction and trackout activities. It is considered that the use of the identified site-specific 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 using standard screening criteria. Due to the magnitude of the proposals, 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	Instruction	1
1.2	Site Location and Context	1
1.3	Assessment Scope	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 - Screen the Need for an Assessment	10
	Step 2 - Assess the Risk of Dust Impacts	10
	Step 3 - Site-specific Mitigation	15
	Step 4 - Determine Significant Effects	15
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
4.5	Sensitive Receptors	20
5.0	CONSTRUCTION PHASE ASSESSMENT	22
5.1	Introduction	22
5.2	Construction Phase Assessment	22
	Step 1 - Screen the Need for an Assessment	22
	Step 2a - Define the Potential Dust Emission Magnitude	22
	Step 2b - Define the Sensitivity of the Area	23
	Step 2c - Define the Risk of Dust Impacts	24
	Step 3 - Site-specific Mitigation	25
	Step 4 - Determine Significant Effects	27

6.0	OPERATIONAL PHASE ASSESSMENT	28
6.1	Stage 1 Screening Assessment	28
6.2	Stage 2 Screening Assessment	28
7.0	CONCLUSION	29
8.0	ABBREVIATIONS	30

Appendix

Appendix 1 - Curricula Vitae

1.0 INTRODUCTION

1.1 Instruction

- 1.1.1 Redmore Environmental Ltd was commissioned by Livv Housing Group to undertake an Air Quality Assessment in support of a planning application for a residential development at Gaywood Green, Kirkby.

1.2 Site Location and Context

- 1.2.1 The site is located at Gaywood Green, Kirkby, at approximate National Grid Reference (NGR): 341877, 397639. The relevant Local Authority (LA) is Knowsley Metropolitan Borough Council (KMBC). Reference should be made to Figure 1 for a map of the site and surrounding area.
- 1.2.2 The proposals comprise the demolition of existing structures and subsequent construction of 75 residential dwellings, alongside associated infrastructure and landscaping.

1.3 Assessment Scope

- 1.3.1 The development proposals have the potential to cause air quality impacts. As such, an Air Quality Assessment has been undertaken to:
- Assess potential impacts associated with fugitive dust emissions during the construction phase of the proposed development;
 - Assess potential impacts associated with road transport emissions during the operational phase of the proposed development; and,
 - Identify the requirement for mitigation measures.
- 1.3.2 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 on 28th 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 The 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 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, 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 December 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 achievements 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, or 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 be relevant to the planning 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 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 sages 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

[...]."

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

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

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.

⁷ Knowsley Replacement UDP, KMBC, 2006.

3.0 METHODOLOGY

3.1 Introduction

3.1.1 The proposed development has the potential to cause air quality impacts during the construction and operational phases. These have therefore been 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 V2.2'⁸.

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

- Demolition;
- 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 V2.2, IAQM, 2024.

Step 1 - Screen the Need for an Assessment

- 3.2.5 Step 1 screens the requirement for a more detailed assessment. Should human receptors be identified within 250m from the boundary or 50m from the construction vehicle route up to 250m 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 250m 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 - Assess the Risk of Dust Impacts

- 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	Demolition	• Total building volume greater than 75,000m³ • Potentially dusty material (e.g. concrete) • On-site crushing and screening • Demolition activities more than 12m above ground level

Magnitude	Activity	Criteria
	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
	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	Demolition	- Total volume of building to be demolished between 12,000m³ and 75,000m³ - Potentially dusty construction material - Demolition activities 6m to 12m above ground level
	Earthworks	- Total site area 18,00m² 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	Demolition	- Total building volume to be demolished less than 12,000m³ - Construction material with low potential for dust release (e.g. metal cladding or timber) - Demolition activities less than 6m above ground and during wetter months
	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

Magnitude	Activity	Criteria
	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 sensitivities of specific receptors are summarised in Table 4.

Table 4 Construction Dust - Sensitivities of People and Ecological Receptors

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, shopping streets, playing fields, farmland, short term car park and roads	Locally designated site e.g. Local Nature Reserve

3.2.11 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 250
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

3.2.12 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 250
High	Greater than 32µg/m ³	More than 100	High	High	High	Medium
		10 - 100	High	High	Medium	Low
		1 - 10	High	Medium	Low	Low
	28 - 32µg/m ³	More than 100	High	High	Medium	Low
		10 - 100	High	Medium	Low	Low
		1 - 10	High	Medium	Low	Low
	24 - 28µg/m ³	More than 100	High	Medium	Low	Low
		10 - 100	High	Medium	Low	Low
		1 - 10	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 250
	Less than 24µg/m ³	More than 100	Medium	Low	Low	Low
		10 - 100	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low
Medium	Greater than 32µg/m ³	More than 10	High	Medium	Low	Low
		1 - 10	Medium	Low	Low	Low
	28 - 32µg/m ³	More than 10	Medium	Low	Low	Low
		1 - 10	Low	Low	Low	Low
	24 - 28µg/m ³	More than 10	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low
	Less than 24µg/m ³	More than 10	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low
		More than 10	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low
Low	-	1 or more	Low	Low	Low	Low

3.2.13 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
Low	Low	Low

3.2.14 Step 2C combines the dust emission magnitude with the sensitivity of the area to determine the risk of unmitigated impacts.

3.2.15 Table 8 outlines the risk category from demolition activities.

Table 8 Construction Dust - Dust Risk Category from Demolition Activities

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

3.2.16 Table 9 outlines the risk category from earthworks, construction and trackout activities.

Table 9 Construction Dust - Dust Risk Category from Earthworks, Construction and Trackout Activities

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

Step 3 - Site-specific Mitigation

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

Step 4 - Determine Significant Effects

3.2.18 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.

⁹ Guidance on the Assessment of Dust from Demolition and Construction V2.2, IAQM, 2024.

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**.

- 3.2.19 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. If any of the following apply:

- 10 or more residential units or a site area of more than 0.5ha; or,
- more than 1,000 m² of floor space for all other uses or a site area greater than 1 ha.

B. Coupled with any of the following:

- the development has more than 10 parking spaces; or,
- the development will have a centralised energy facility or other centralised combustion process.

- 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.

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

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

3.3.4 Where the above criteria are met, then the assessor should proceed to assess the development proposals against the following Stage 2 screening criteria:

- The development leads to a change of Light Duty Vehicle (LDV) flows of:
 - More than 100 Annual Average Daily Traffic (AADT) within an AQMA;
 - More than 500 AADT outside of an AQMA;
- The development leads to a change of HDV flows of:
 - More than 25 AADT within an AQMA;
 - More than 100 AADT outside of an AQMA;
- Introduce a new junction that would cause traffic flow to change behaviour with respect to acceleration/deceleration or introduce queueing traffic where there previously wasn't any (such as a roundabout or traffic lights); and,
- Introduce one or more significant combustion processes where there is a risk of impact to relevant receptors.

3.3.5 Should these criteria not be met, then the IAQM guidance¹² considers air quality impacts associated with a scheme to be **not significant** and no further assessment is required. Where the screening criteria is met, further assessment including atmospheric dispersion modelling of impacts, may be required.

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 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 NO₂ results recorded in the vicinity of the development, as provided in KMBC's '2023 Air Quality Annual Status Report (ASR)'¹³, are shown in Table 10. Exceedances of the relevant AQO are shown in **bold**.

Table 10 Monitoring Results

Monitoring Site		Monitored Annual Mean NO ₂ Concentration (µg/m ³)			
		2019	2020	2021	2022
K1a, K1b	LC056A Junction of M57 and Valley Road	45.4	38.0	33.3	34.0
K7a, K7b	LC067 Corner of County Road and Webster	29.6	24.1	21.7	20.0
K8a, K8b	LC002 Outside Webster Drive	32.4	28.7	25.8	24.7
K9a, K9b	LC 017 on Cherryfield Drove	35.3	27.7	27.1	28.6

¹³ KMBC 2023 Air Quality ASR, KMBC, 2023.

Monitoring Site		Monitored Annual Mean NO ₂ Concentration (µg/m ³)			
		2019	2020	2021	2022
K10a, K10b	Outside 19 Moorgate Road (A5207)	29.4	24.1	22.9	20.6

4.3.2 As shown in Table 10, annual mean NO₂ concentrations were above the AQO of 40µg/m³ at the K1a, K1b monitor in 2019. As the site is positioned at a roadside location, elevated results would be expected. Levels were below the AQO at all remaining survey positions. Reference should be made to Figure 2 for a map of the survey positions.

4.3.3 Pollutant concentrations recorded during 2020 and 2021 were affected by changes to travel patterns associated with the COVID-19 pandemic. The results should therefore be viewed with caution.

4.3.4 KMBC do not undertake PM₁₀ or PM_{2.5} monitoring within the vicinity of the proposed development.

4.4 **Background Pollutant Concentrations**

4.4.1 Predictions of background annual mean 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 within grid square NGR: 341500, 397500. Data for this location was downloaded from the DEFRA website¹⁴ for the purpose of the assessment and is summarised in Table 11.

Table 11 Background Annual Mean Pollutant Concentration Predictions

Pollutant	Predicted 2024 Background Annual Mean Pollutant Concentration (µg/m ³)
NO ₂	13.00
PM ₁₀	12.81
PM _{2.5}	8.82

¹⁴ <http://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018>.

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

4.5 **Sensitive Receptors**

- 4.5.1 A sensitive receptor is defined as any location which may be affected by changes in air quality as a result of a development. Receptors sensitive to potential dust impacts during demolition, earthworks and construction were identified from a desk-top study of the area up to 250m from the boundary. These are summarised in Table 12.

Table 12 Demolition, Earthworks and Construction Dust Sensitive Receptors

Distance from Site Boundary (m)	Approximate Number of Human Receptors	Approximate Number of Ecological Receptors
Up to 20	More than 100	0
Up to 50	More than 100	0
Up to 100	More than 100	-
Up to 250	More than 100	-

- 4.5.2 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 250m 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	More than 100	0
Up to 50	More than 100	0

- 4.5.3 There are no ecological receptors within 50m of the development boundary or the access route within 250m of the site entrance. As such, ecological impacts have not been assessed further within this report.

4.5.4 Based on the criteria shown in Table 4, the sensitivity of the receiving environment to potential dust impacts was determined as **high**. This because the identified receptors included residential properties and Parklands Private Day Nursery.

5.0 CONSTRUCTION PHASE ASSESSMENT

5.1 Introduction

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

5.2 Construction Phase Assessment

Step 1 - Screen the Need for an Assessment

- 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 on the local road network also have the potential to result in the re-suspension of dust from 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 The desk-study undertaken to inform the baseline, as detailed in Section 4.5, identified a number of sensitive receptors within 250m of the site boundary and within 50m of routes to be used by construction vehicles to access the site. As such, a detailed assessment of potential dust impacts was required.

Step 2a - Define the Potential Dust Emission Magnitude

Demolition

- 5.2.4 Demolition will be undertaken at the start of the construction phase and will involve clearance of the existing structures on site. The total building volume to be demolished is less than 12,000m³. In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from demolition is therefore **small**.

Earthworks

- 5.2.5 The total site area is less than 18,000m². In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from construction is therefore **small**.

Construction

- 5.2.6 Due to the size of the development, the total building volume is likely to be between 12,000m³ and 75,000m³. In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from construction is therefore **medium**.

Trackout

- 5.2.7 Based on the site area, it is anticipated that the unpaved road length will be between 50m and 100m. In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from trackout is therefore **medium**.

Step 2b - Define the Sensitivity of the Area

Dust Soiling

- 5.2.8 As shown in Table 12, there are more than 100 high sensitivity receptors within 20m of the site boundary. The sensitivity of the area with respect to dust soiling from demolition, earthworks and construction, as defined using the criteria summarised in Table 5, is therefore considered to be **high**.
- 5.2.9 As shown in Table 13, there are more than 100 high sensitivity receptors within 20m of the road network within 250m of the site access. The sensitivity of the area with respect to dust soiling from trackout, as defined using the criteria summarised in Table 5, is therefore considered **high**.

Human Health

- 5.2.10 As shown in Table 11, the annual mean PM₁₀ background concentration at the site is 12.81µg/m³. As shown in Table 6, where the background annual mean PM₁₀ concentration is below 24µg/m³ and there are more than 100 high sensitivity receptors

within 20m of the site boundary, the sensitivity of the area to potential human health impacts is **medium**.

- 5.2.11 There are more than 100 high sensitivity receptors within 20m of the road network within 250m of the site access. The sensitivity of the area with respect to human health from trackout, as defined using the criteria summarised in Table 6, is therefore considered to be **medium**.

Step 2c - Define the Risk of Dust Impacts

- 5.2.12 The derived dust emission magnitude for each activity was combined with the sensitivity of the area to determine the risk of unmitigated impacts in line with the methodology set out in Table 8 and Table 9. A summary of the risk from each dust generating activity is provided in Table 14.

Table 14 Summary of Potential Unmitigated Dust Risks

Potential Impact	Risk			
	Demolition	Earthworks	Construction	Trackout
Dust Soiling	Medium	Low	Medium	Medium
Human Health	Low	Low	Medium	Medium

- 5.2.13 As indicated in Table 14, the potential risk of dust soiling is **medium** from demolition construction and trackout and **low** from earthworks. The potential risk of human health impacts is **medium** from construction and trackout and **low** from demolition and earthworks.
- 5.2.14 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 construction phase.

Step 3 - Site-specific Mitigation

5.2.15 The IAQM guidance¹⁵ 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 15. These may be reviewed prior to the commencement of construction works and incorporated into a Construction Environmental Management Plan (CEMP) or similar if required by the LA.

Table 15 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, 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

¹⁵ Guidance on the Assessment of Dust from Demolition and Construction V2.2, IAQM, 2024.

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 • Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site • Fully enclose site or specific operations where there is a high potential for dust production and the site is 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 on site • 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	• Avoid 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 • Bag and remove any biological debris or damp down such material before demolition
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 • Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery
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 • Implement a wheel washing system, if required

Step 4 - Determine Significant Effects

5.2.16 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 guidance¹⁶.

¹⁶ Guidance on the Assessment of Dust from Demolition and Construction V2.2, IAQM, 2024.

6.0 OPERATIONAL PHASE ASSESSMENT

6.1 Stage 1 Screening Assessment

- 6.1.1 Any vehicle movements associated with the development will generate exhaust emissions on the local and regional road networks. Information provided by the Transport Consultants for the project indicates the development is predicted to generate 263 daily vehicle trips. The proposals have been assessed against the IAQM Stage 1¹⁷ screening criteria as detailed in Section 3.3. The development includes more than 10 residential units. As such, the Stage 2 Screening Criteria have been considered.

6.2 Stage 2 Screening Assessment

- 6.2.1 The site is not located within an AQMA, nor are the proposals likely to affect a nearby AQMA. Therefore, the relevant screening criteria for 'outside an AQMA', as detailed in Section 3.3, have been utilised for the assessment.
- 6.2.2 Based on the information above, the development is not predicted to result in an increase in LDV flows of more than 500 AADT. Additionally, the proposals do not include significant highway realignment or the introduction of a junction and there will not be a requirement for more than 100 HDV deliveries per day. As such, potential air quality impacts associated with the operational phase are predicted to be **not significant**, in accordance with the IAQM criteria shown in Section 3.3.

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

7.0 CONCLUSION

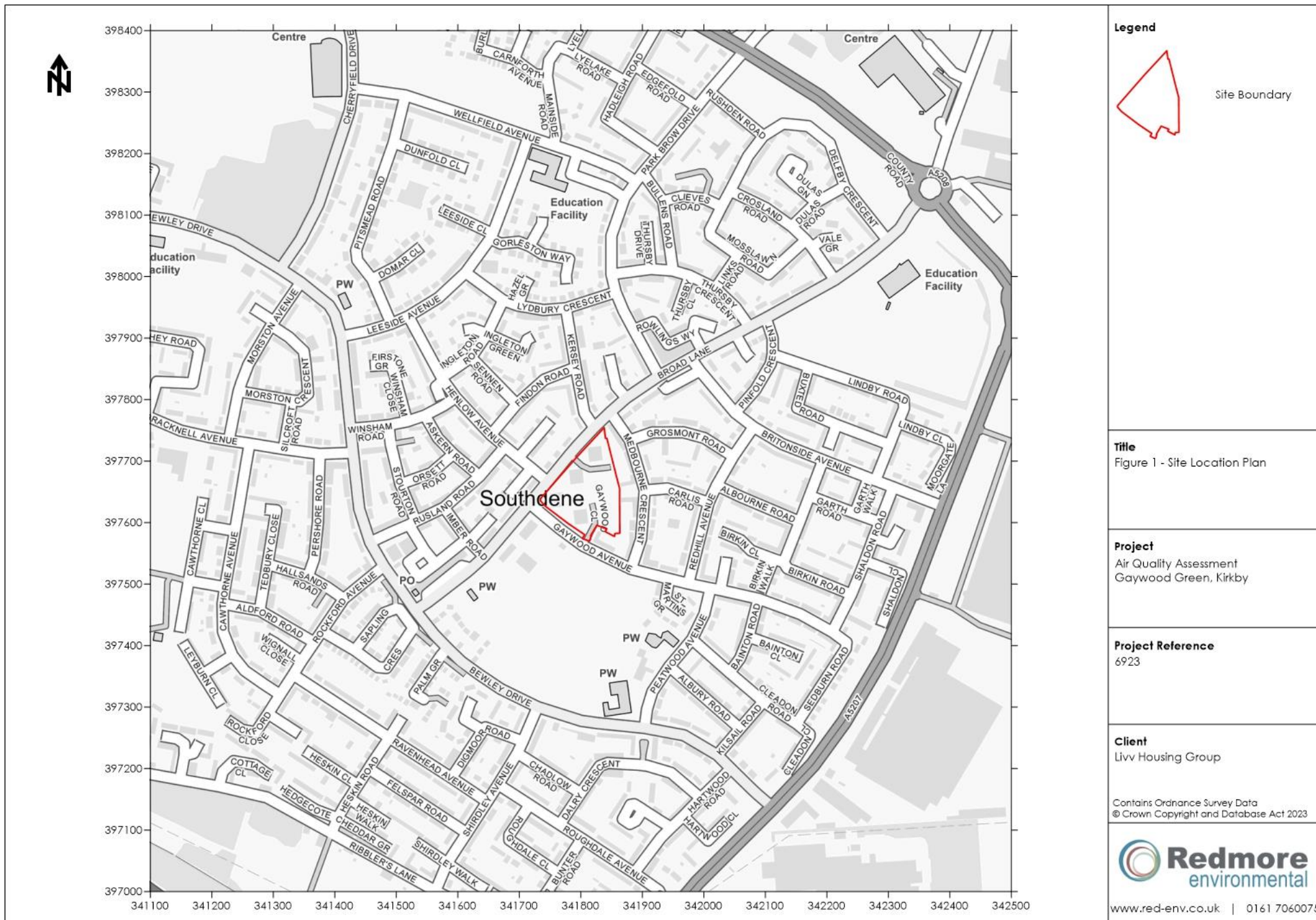
- 7.1.1 Redmore Environmental Ltd was commissioned by Livv Housing Group to undertake an Air Quality Assessment in support of a planning application for a residential development at Gaywood Green, Kirkby.
- 7.1.2 The development has the potential to cause air quality impacts at sensitive locations during the construction and operational phases. As such, an Air Quality Assessment was undertaken to determine baseline conditions and assess potential impacts as a result of the scheme.
- 7.1.3 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. Site-specific dust control measures were subsequently determined. Following implementation, the residual significance of potential air quality impacts from dust generated by demolition, earthworks, construction and trackout activities are predicted to be **not significant**.
- 7.1.4 Potential impacts during the operational phase of the proposed development may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the site. These were assessed against the screening criteria provided within the IAQM¹⁸ guidance document. This indicated road traffic exhaust impacts were predicted to be **not significant**.
- 7.1.5 Based on the assessment results, air quality factors are not considered a constraint to planning consent for the development.

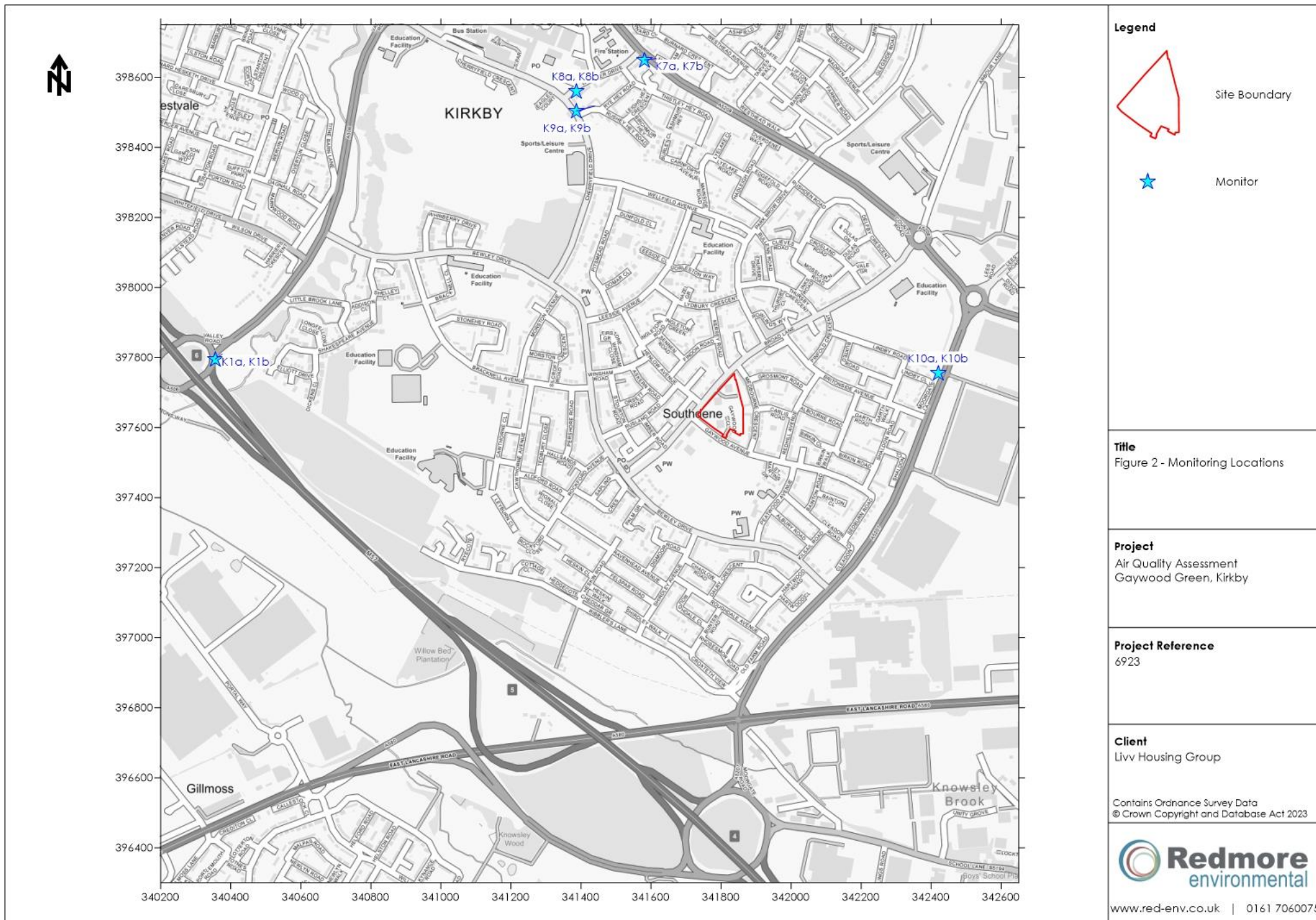
¹⁸ Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

8.0 **ABBREVIATIONS**

AADT	Annual Average Daily Traffic
AQLV	Air Quality Limit Value
AQMA	Air Quality Management Area
AQO	Air Quality Objective
AQS	Air Quality Strategy
ASR	Annual Status Report
CEMP	Construction Environmental Management Plan
DEFRA	Department for Environment, Food and Rural Affairs
HDV	Heavy Duty Vehicle
IAQM	Institute of Air Quality Management
KMBC	Knowsley Metropolitan Borough Council
LA	Local Authority
LAQM	Local Air Quality Management
LCC	Liverpool City Council
LDV	Light Duty Vehicle
LA	Local Authority
NGR	National Grid Reference
NO ₂	Nitrogen dioxide
NPPF	National Planning Policy Framework
NPPG	National Planning Policy 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
UDP	Unitary Development Plan

Figures





Appendix 1 - Curricula Vitae

KEY EXPERIENCE:

Emily is a Senior Environmental Consultant with specialist experience in the air quality sector. Her key capabilities include:

- Production of Air Quality Assessments in accordance with Department for Environment, Food and Rural Affairs (DEFRA) methodologies for a range of residential, commercial and industrial sectors.
- Detailed dispersion modelling of road vehicle exhaust emissions using ADMS-Roads. Studies have included assessment of road traffic exhaust emissions on sensitive receptors and exposure of new residents to poor air quality.
- Advanced canyon modelling to evaluate the impact of altered urban topography on air quality in built up areas.
- Assessment of construction dust impacts from a range of development sizes.
- Definition of baseline air quality and identification of sensitive areas across the UK.
- Production of air quality mitigation strategies specifically tailored to address issues at individual sites.
- Air quality monitoring at industrial sites to quantify pollutant concentrations
- Odour surveys to assess amenity and suitability of sites for potential future development for residential use.

SELECT PROJECTS SUMMARY:

Bowlers Yard, Manchester

Air Quality Assessment in support of an eleven storey residential development to provide circa 65 units on land known as Bowlers Yard, Manchester. The site was located in an Air Quality Management Area (AQMA) and concerns were raised regarding the exposure of future occupants to poor air quality due to road traffic emissions. Detailed dispersion modelling was undertaken using ADMS-roads to assess PM_{2.5}, PM₁₀ and NO₂ concentrations across the site. Results indicated that pollution levels were below the air quality objectives across the development.

Freemasons Arms Hotel, Heywood

Air Quality Assessment to support a residential-led development in an AQMA. Detailed dispersion modelling was undertaken with the inclusion of advanced canyon modelling to evaluate the impact of the urban topography within the locality on the dispersion of traffic related pollutants. Predicted concentrations of NO₂ were found to exceed air quality criteria at the building façade fronting Market Place at first floor level. As such, mitigation was specified for the affected units to ensure future residents would not be exposed to poor air quality.

Griffin Road, London

Air Quality Assessment in support of a residential development located in an AQMA. Detailed dispersion modelling was undertaken using ADMS-roads to assess PM₁₀ and NO₂ concentrations across the site. Results indicated that pollution levels were classified as APEC - A in accordance with the London Councils Air Quality and Planning Guidance.

High Street, Dudley

Odour Impact Assessment in support of a proposed residential-led development. Due to the location of the site, being above an existing hot food takeaway, odour surveys were required to assess the level of odour across the development. A risk assessment was also undertaken in accordance with the relevant odour guidance. An appropriate ventilation system was identified on the basis of the assessment results.

East Common Lane, Selby

Air Quality Assessment in support of an industrial development on land associated with Access 63 Business Park, East Common Lane Selby. Due to the size of the development it was possible that traffic generated from the scheme may cause negative impacts on sensitive receptors nearby. NO₂ and PM₁₀ concentrations were quantified at specific receptor points to ensure there would be no significant increases in pollution levels. Results revealed negligible impacts at all locations.

Wharton Road, Winsford

Air Quality Assessment in support of a residential development of circa 138 units on land off Wharton Road, Winsford. Using sensitive receptors, located in areas where increased road traffic may affect NO₂ concentrations, a comparison was made between overall concentrations with and without the development in place. Results revealed pollutant concentrations were below the relevant standards across the site and impacts associated with the development were not significant.

KEY EXPERIENCE:

Alec is an Environmental Consultant with specialist experience in the air quality sector. His key capabilities include:

- Production of Air Quality Assessments in accordance with Department for Environment, Food and Rural Affairs (DEFRA) methodologies for a range of residential, commercial and industrial sectors
- Detailed dispersion modelling of road vehicle and industrial emissions using ADMS-Roads and ADMS-6. Studies have included impact assessment of ground level pollutant concentrations and assessment of suitability of development sites for proposed end-use.
- Advanced Canyon Modelling to evaluate the impact of altered urban topography on air quality in built up areas
- Assessment of fugitive dust impacts from a range of industrial developments.
- Assessment of petrol stations to address benzene concentrations and their impact on adjacent developments.
- Periodic bioaerosol monitoring campaigns at a number of waste facilities in support of permit compliance.
- Assessment of potential effects associated with network realignment schemes and highway developments.
- Development of bespoke monitoring programmes to assess workplace exposure at commercial and industrial facilities and colleges.

SELECT PROJECTS SUMMARY:

Bowlers Yard, Manchester

Air Quality Assessment in support of an eleven storey residential development to provide circa 65 units on land known as Bowlers Yard, Manchester. The site was located in an Air Quality Management Area (AQMA) and concerns were raised regarding the exposure of future occupants to poor air quality due to road traffic emissions. Detailed dispersion modelling was undertaken using ADMS-roads to assess PM_{2.5}, PM₁₀ and NO₂ concentrations across the site. Results indicated that pollution levels were below the air quality objectives across the development.

Freemasons Arms Hotel, Heywood

Air Quality Assessment to support a residential-led development in an AQMA. Detailed dispersion modelling was undertaken with the inclusion of advanced canyon modelling to evaluate the impact of the urban topography within the locality on the dispersion of traffic related pollutants. Predicted concentrations of NO₂ were found to exceed air quality criteria at the building façade fronting Market Place at first floor level. As such, mitigation was specified for the affected units to ensure future residents would not be exposed to poor air quality.

Griffin Road, London

Air Quality Assessment in support of a residential development located in an AQMA. Detailed dispersion modelling was undertaken using ADMS-roads to assess PM₁₀ and NO₂ concentrations across the site. Results indicated that pollution levels were classified as APEC - A in accordance with the London Councils Air Quality and Planning Guidance.

High Street, Dudley

Odour Impact Assessment in support of a proposed residential-led development. Due to the location of the site, being above an existing hot food takeaway, odour surveys were required to assess the level of odour across the development. A risk assessment was also undertaken in accordance with the relevant odour guidance. An appropriate ventilation system was identified on the basis of the assessment results.

East Common Lane, Selby

Air Quality Assessment in support of an industrial development on land associated with Access 63 Business Park, East Common Lane Selby. Due to the size of the development it was possible that traffic generated from the scheme may cause negative impacts on sensitive receptors nearby. NO₂ and PM₁₀ concentrations were quantified at specific receptor points to ensure there would be no significant increases in pollution levels. Results revealed negligible impacts at all locations.

Wharton Road, Winsford

Air Quality Assessment in support of a residential development of circa 138 units on land off Wharton Road, Winsford. Using sensitive receptors, located in areas where increased road traffic may affect NO₂ concentrations, a comparison was made between overall concentrations with and without the development in place. Results revealed pollutant concentrations were below the relevant standards across the site and impacts associated with the development were not significant.