

Air Quality Assessment
Manor Hotel, Gravesend

Client: Best Western Manor Hotel

Reference: 6856r1

Date: 16th June 2023



Report Issue

Report Title: Air Quality Assessment - Manor Hotel, Gravesend

Report Reference: 6856

Field	Report Version			
	1	2	3	4
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Date of Issue	16 th June 2023			
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Executive Summary

Redmore Environmental Ltd was commissioned by Best Western Manor Hotel to undertake an Air Quality Assessment in support of a residential development on land associated with the Manor Hotel, off Hever Court Road, Gravesend.

The development may lead to the exposure of future residents to any existing air quality issues at the site, as well as adverse air quality impacts at sensitive locations during the construction and operational phases. As such, an Air Quality Assessment was undertaken in order to determine baseline conditions, consider location suitability for the proposed end-use and assess potential effects associated with 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 the exposure of future residents to elevated pollution levels. Dispersion modelling was therefore undertaken in order to predict concentrations across the proposed site as a result of emissions from the highway network. Results were subsequently verified using local monitoring data.

The results of the dispersion modelling assessment indicated that predicted pollutant levels were below the relevant criteria across the development. As such, the site is considered suitable for the proposed end use from an air quality perspective and mitigation is not required.

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 low number of anticipated vehicle trips associated with the proposals, road traffic exhaust emission 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.

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1.0 INTRODUCTION

1.1 Background

- 1.1.1 Redmore Environmental Ltd was commissioned by Best Western Manor Hotel to undertake an Air Quality Assessment in support of a residential development on land associated with the Manor Hotel, off Hever Court Road, Gravesend.
- 1.1.2 The development may lead to the exposure of future residents to any existing air quality issues at the site, as well as adverse air quality impacts at sensitive locations during the construction and operational phases. As such, an Air Quality Assessment was undertaken in order to determine baseline conditions, consider location suitability for the proposed end-use and assess potential effects associated with the scheme.

1.2 Site Location and Context

- 1.2.1 The site is located on the existing car park of the Manor Hotel, off Hever Court Road, Gravesend, at approximate National Grid Reference (NGR): 565578, 170628. Reference should be made to Figure 1 for a map of the site and surrounding area.
- 1.2.2 The proposals comprise the construction of 12 residential dwellings and associated infrastructure.
- 1.2.3 Gravesham Borough Council (GBC) has declared an Air Quality Management Area (AQMA) due to exceedences of the Air Quality Objectives (AQOs) for annual mean concentrations of nitrogen dioxide (NO₂) and annual and 24-hour mean concentrations of particulate matter with an aerodynamic diameter of less than 10µm (PM₁₀). The development is partly located within the AQMA. As such, there is the potential for the exposure of future residents to poor quality, as well as adverse impacts in this sensitive area as a result of the construction and operational phases of the proposals. An Air Quality Assessment was therefore undertaken in order to determine baseline conditions, assess potential impacts as a result of the scheme and define any requirement for mitigation. 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:

- NO₂;
- Sulphur dioxide;
- Lead;
- 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 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, AQLVs and Interim Target for pollutants considered within this assessment.

Table 1 Air Quality Objectives/Air Quality Limit Values/Interim Target

Pollutant	Air Quality Objective/Air Quality Limit Value/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}	20 ^(a)	Annual mean
	12 ^(b)	Annual mean

Note: (a) Current AQLV.

(b) 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

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

Averaging Period	Objective Should Apply At	Objective Should Not Apply At
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
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 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 July 2021 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

⁴ NPPF, Ministry of Housing, Communities and Local Government, 2021.

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 [...]."

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?

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

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?

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 Development Plan for GBC comprises of a number of documents. These include the Gravesham Local Plan Core Strategy⁶ adopted in September 2014 and the Gravesham Local Plan First Review - Saved and Deleted Policies⁷.

2.6.2 Review of the Local Plan Core Strategy identified the following policies of relevance to this assessment:

"Policy CS01: Sustainable Development

[...]

4.1.7 When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy. It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

4.1.8 Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

⁶ Gravesham Local Plan Core Strategy, GBC, 2014.

⁷ Gravesham Local Plan First Review - Saved and Deleted Policies, GBC, 2014.

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted."

"Policy CS19: Development and Design Principles

5.15.14 New development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change. This will be achieved through the criteria set out below:

[...]

New development will be located, designed and constructed to:

[...]

- avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination;

[...]"

2.6.3 The above policies were taken into consideration throughout the undertaking of the assessment.

2.6.4 Review of the Gravesham Local Plan First Review - Saved and Deleted Policies did not indicate any policies of relevance to this assessment.

3.0 METHODOLOGY

3.1 Introduction

3.1.1 The proposed development has the potential to exposure future residents to elevated pollution levels, as well as cause air quality impacts during the construction and operational phases. 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 V1.1'⁸.

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 V1.1, IAQM, 2016.

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 10,000m² • 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 8m in height • More than 100,000 tonnes of material moved

Magnitude	Activity	Criteria
	Construction	- Total building volume greater than 100,000m³ - 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 2,500m² to 10,000m² - Moderately dusty soil type (e.g. silt) 5 to 10 heavy earth moving vehicles active at any one time - Formation of bunds 4m to 8m in height - Total material moved 20,000 tonnes to 100,000 tonnes
	Construction	- Total building volume 25,000m³ to 100,000m³ - Potentially dusty construction material (e.g. concrete) - On site concrete batching
	Trackout	10 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 2,500m² - 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 4m in height - Total material moved less than 20,000 tonnes - Earthworks during wetter months
	Construction	- Total building volume less than 25,000m³ - Construction material with low potential for dust release (e.g. metal cladding or timber)
	Trackout	- Less than 10 HDV trips per day - Surface material with low potential for dust release - Unpaved road length less than 50m

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

3.2.14 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.

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

3.2.16 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

3.2.17 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/m ³	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/m ³	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/m ³	High	Medium	Low	Low	Low
			1 - 10	Medium	Low	Low	Low
	28 - 32µg/m ³	More than 10	Medium	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low	Low
	24 - 28µg/m ³	More than 10	Low	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low	Low
	Less than 24µg/m ³	More than 10	Low	Low	Low	Low	Low
		1 - 10	Low	Low	Low	Low	Low
	Low	-	1 or more	Low	Low	Low	Low

3.2.18 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

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

3.2.20 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

3.2.21 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

3.2.22 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

⁹ Guidance on the Assessment of Dust from Demolition and Construction V1.1, IAQM, 2016.

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

3.2.23 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**.

3.2.24 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 2.

3.3 Operational Phase Assessment

Potential Future Exposure

3.3.1 The proposals have the potential to expose future residents to elevated pollution levels. In order to assess NO₂, PM₁₀ and PM_{2.5} concentrations across the development site, detailed dispersion modelling was undertaken. Reference should be made to Appendix 1 for a full description of the assessment input data.

3.3.2 The dispersion modelling results were compared against the relevant AQOs, AQLV and Interim Target in order to determine the potential for exposure of future residents to elevated pollutant concentrations and identify appropriate mitigation, if necessary.

Potential Development Impacts

3.3.3 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. An assessment was therefore undertaken using the criteria contained within the IAQM 'Land-Use Planning & Development Control: Planning

for Air Quality¹⁰ guidance to determine the potential for trips generated by the development to affect local air quality.

3.3.4 The following criteria are provided to help establish when an assessment of potential road traffic 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,
- Introduction of a new junction or removal of an existing junction near to relevant receptors.

3.3.5 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.

3.3.6 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.

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

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 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), GBC has undertaken Review and Assessment of air quality within their area of jurisdiction. This process has indicated that annual mean concentrations of NO₂ and annual and 24-hour mean concentrations of PM₁₀ are above the AQOs within the borough. As such, four AQMA's have been declared. The closest to the site is described as follows:

"A2 Trunk Road AQMA: An area extending either side of the length of the A2 within the borough."

- 4.2.2 The development is partly located within the AQMA. As such, there is the potential for the exposure of future residents to poor air quality as well as vehicles travelling to and from the site to increase pollution levels in this sensitive area. This has been considered throughout the assessment.
- 4.2.3 GBC has concluded that concentrations of all other pollutants considered within the AQS are currently below the relevant AQOs. As such, no further AQMA's have been designated.

4.3 Air Quality Monitoring

- 4.3.1 Monitoring of pollutant concentrations is undertaken by GBC throughout their area of jurisdiction. Recent NO₂ results recorded in the vicinity of the development are shown in Table 10.

Table 10 Monitoring Results

Monitoring Site		Monitored Annual Mean NO ₂ Concentration (µg/m ³)		
		2019	2020	2021
GR110	Nells Café, Valley Drive, Gravesend	38.7	32.1	29.7

4.3.2 As shown in Table 10, annual mean NO₂ concentrations were below the AQO of 40µg/m³ at the GR110 - Nells Café monitor in recent years. Reference should be made to Figure 2 for a map of the survey position.

4.3.3 Pollutant concentrations recorded during 2020 and 2021 were lower than 2019 due to a reduction in traffic and associated emissions caused by the COVID-19 pandemic. The results should therefore be viewed with caution.

4.3.4 GBC does not undertake monitoring of PM₁₀ or PM_{2.5} 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: 565500, 170500. Data for this location was downloaded from the DEFRA website¹³ for the purpose of the assessment and is summarised in Table 11.

Table 11 Background Pollutant Concentration Predictions

Pollutant	Predicted Background Pollutant Concentration (µg/m ³)		
	2019	2023	2025
NO ₂	22.28	18.61	16.96
PM ₁₀	18.57	17.69	17.31
PM _{2.5}	12.03	11.33	11.03

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

- 4.4.2 As shown in Table 11, predicted background NO₂ and PM₁₀ concentrations are below the relevant AQOs at the proposed development site. Predicted background PM_{2.5} concentrations are above the Interim Target during 2019, though levels drop below in 2023 and 2025.

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 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	10 - 100	0
Up to 50	More than 100	0
Up to 100	More than 100	-
Up to 350	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 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	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 500m of the site entrance. As such, ecological impacts have not been assessed further within this report.

- 4.5.4 A number of additional factors have been considered when determining the sensitivity of the surrounding area. These are summarised in Table 14.

Table 14 Additional Area Sensitivity Factors to Potential Dust Impacts

Guidance	Comment
Whether there is any history of dust generating activities in the area	The baseline review did not indicate any dust generating activities in the local area
The likelihood of concurrent dust generating activity on nearby sites	A review of the planning portal indicated a number of applications have recently been submitted within the vicinity of the site. It is therefore possible that there may be concurrent dust generation in the area should these be granted permission and the construction phases overlap with the proposals
Pre-existing screening between the source and the receptors	Trees are located along the site boundary. These may act as a barrier between emission sources and receptors should they be retained during construction
Conclusions drawn from analysing local meteorological data which accurately represent the area: and if relevant the season during which works will take place	As shown in Figure 3, the predominant wind bearing at the site is from the south-west. As such, receptors to the north-east are most likely to be affected by dust releases
Conclusions drawn from local topography	There are no significant topographical constraints to dust dispersion
Duration of the potential impact, as a receptor may become more sensitive over time	Currently it is unclear as to the duration of the construction phase. However, it is likely that it will extend over one year. The sensitivity of nearby receptors is unlikely to change during this time
Any known specific receptor sensitivities which go beyond the classifications given in the document	No specific receptor sensitivities identified during the baseline assessment

- 4.5.5 Dust sensitive receptors within 350m of the development site include places of work and residential dwellings. These are considered to be of **medium** and **high** sensitivity, respectively. It should be noted that only receptors of **medium** sensitivity are present within 20m of the boundary.

- 4.5.6 The sensitivity of the receiving environment to specific potential dust impacts, based on the criteria shown in Section 3.2, is shown in Table 15.

Table 15 Sensitivity of the Surrounding Area to Potential Dust Impacts

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

5.0 **ASSESSMENT**

5.1 **Introduction**

- 5.1.1 The proposal has the potential to expose future residents to elevated pollution levels, as well as cause adverse air quality impacts at sensitive locations. These factors 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 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 identified a number of sensitive receptors within 350m of the site boundary. As such, a detailed assessment of potential dust impacts was required.

Step 2

Earthworks

- 5.2.4 Earthworks may involve excavating material, haulage, tipping and stockpiling. The area of the proposed development site is between 2,500m² and 10,000m². In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from earthworks is therefore **medium**.

5.2.5 Table 15 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 **medium** risk site for dust soiling as a result of earthworks.

5.2.6 Table 15 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

5.2.7 Due to the size of the development, the total building volume will be less than 25,000m³. In accordance with the criteria outlined in Table 3, the magnitude of potential dust emissions from construction is therefore **small**.

5.2.8 Table 15 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.

5.2.9 Table 15 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

5.2.10 Based on the site area and existing hardstanding, 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**.

5.2.11 Table 15 indicates the sensitivity of the area to dust soiling effects to people and property is **high**. In accordance with the criteria outlined in Table 9, the development is considered to be a **low** risk site for dust soiling as a result of trackout activities.

5.2.12 Table 15 indicates the sensitivity of the area to human health impacts is **medium**. 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 activities.

Summary of the Risk of Dust Effects

5.2.13 A summary of the risk from each dust generating activity is provided in Table 16.

Table 16 Summary of Potential Unmitigated Dust Risks

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

5.2.14 As indicated in Table 16, the potential risk of dust soiling is **medium** from earthworks and **low** from construction and trackout. The potential risk of human health effects is **low** from earthworks and **negligible** from construction and trackout.

5.2.15 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

5.2.16 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 17. 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.

¹⁴ Guidance on the Assessment of Dust from Demolition and Construction V1.1, IAQM, 2017.

Table 17 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) or similar, 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 off- site, 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
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 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

Issue	Control Measure
Operations	• Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques • Ensure an adequate water supply on the site for effective dust suppression, using non-potable water where possible and appropriate • Use enclosed chutes and conveyors and covered skips • Minimise drop heights and use fine water sprays wherever appropriate • Ensure equipment is available to clean any dry spillages, and clean up spillages as soon as reasonably practicable using wet cleaning methods
Waste management	• No bonfires and 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 • 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

5.2.17 Assuming the relevant mitigation measures outlined in Table 17 are implemented, the residual impact from all dust generating activities is predicted to be **not significant**, in accordance with the IAQM guidance¹⁵.

5.3 Operational Phase Assessment

Potential Future Exposure

5.3.1 The proposed development has the potential to expose future residents to elevated pollution levels. Dispersion modelling was therefore undertaken with the inputs described

¹⁵ Guidance on the Assessment of Dust from Demolition and Construction V1.1, IAQM, 2016.

in Appendix 1 to quantify air quality conditions at the site. Reference should be made to Figures 4 to 7 for graphical representations of the results.

5.3.2 As shown in Figure 4, annual mean NO₂ concentrations were predicted to be below the AQO of 40µg/m³ across the site. The maximum level was 25.87µg/m³.

5.3.3 As shown in Figure 5, annual mean PM₁₀ concentrations were predicted to be below the AQO of 40µg/m³ across the site. The maximum level was 21.00µg/m³.

5.3.4 As shown in Figure 6, the number of days with PM₁₀ concentrations greater than 50µg/m³ was predicted to be below the permitted number of 35 across the site.

5.3.5 As shown in Figure 7, annual mean PM_{2.5} concentrations were predicted to be below the AQLV of 20µg/m³ across the site. The maximum level was 13.03µg/m³. This is above the Interim Target of 12µg/m³. However, it is anticipated that vehicle exhaust emission rates and background concentrations will improve in future years through local and national policy initiatives. Therefore, annual mean PM_{2.5} concentrations will reduce across the proposed development site by 2028.

5.3.6 Based on the assessment results, the site is considered suitable for the proposed use from an air quality perspective.

Potential Development Impacts

5.3.7 Any vehicle movements associated with the development will generate exhaust emissions on the local and regional road networks. The Transport Statement¹⁶ for the scheme prepared by Vectos, the Transport Consultants for the project, indicates the development is predicted to generate 57 daily vehicle trips.

5.3.8 Based on the information above, the development is not predicted to result in an increase in LDV flows of more than 500 AADT on any individual road link or 100 AADT within the AQMA. Additionally, the proposals do not include significant highway realignment or the introduction of a junction and there will not be a requirement for than

¹⁶ Transport Statement: Proposed Hotel Redevelopment and Residential Development at Manor Hotel Site, Gravesend, Vectos, 2023.

25 HDV deliveries per day. As such, potential air quality impacts associated with the operational phase road vehicle exhaust emissions are predicted to be **not significant**, in accordance with the IAQM¹⁷ criteria shown in Section 3.3.

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

6.0 CONCLUSION

- 6.1.1 Redmore Environmental Ltd was commissioned by Best Western Manor Hotel to undertake an Air Quality Assessment in support of a residential development on land associated with the Manor Hotel, off Hever Court Road, Gravesend.
- 6.1.2 The development may lead to the exposure of future residents to any existing air quality issues at the site, as well as adverse air quality impacts at sensitive locations during the construction and operational phases. As such, an Air Quality Assessment was undertaken in order to determine baseline conditions, consider location suitability for the proposed end-use and assess potential effects associated with 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 The proposal has the potential to expose future residents to elevated pollution levels. Dispersion modelling was therefore undertaken using ADMS-Roads in order to predict concentrations as a result of emissions from the local highway network. Results were subsequently verified using local monitoring data.
- 6.1.5 The results of the dispersion modelling assessment indicated that predicted annual mean NO₂, PM₁₀ and PM_{2.5} concentrations were below the relevant AQOs and AQLV across the development. As such, the site is considered suitable for the proposed end use from an air quality perspective and mitigation is not required.
- 6.1.6 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. Due to the low number of anticipated vehicle trips associated with the proposals, air quality impacts were predicted to be **not significant**.

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

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

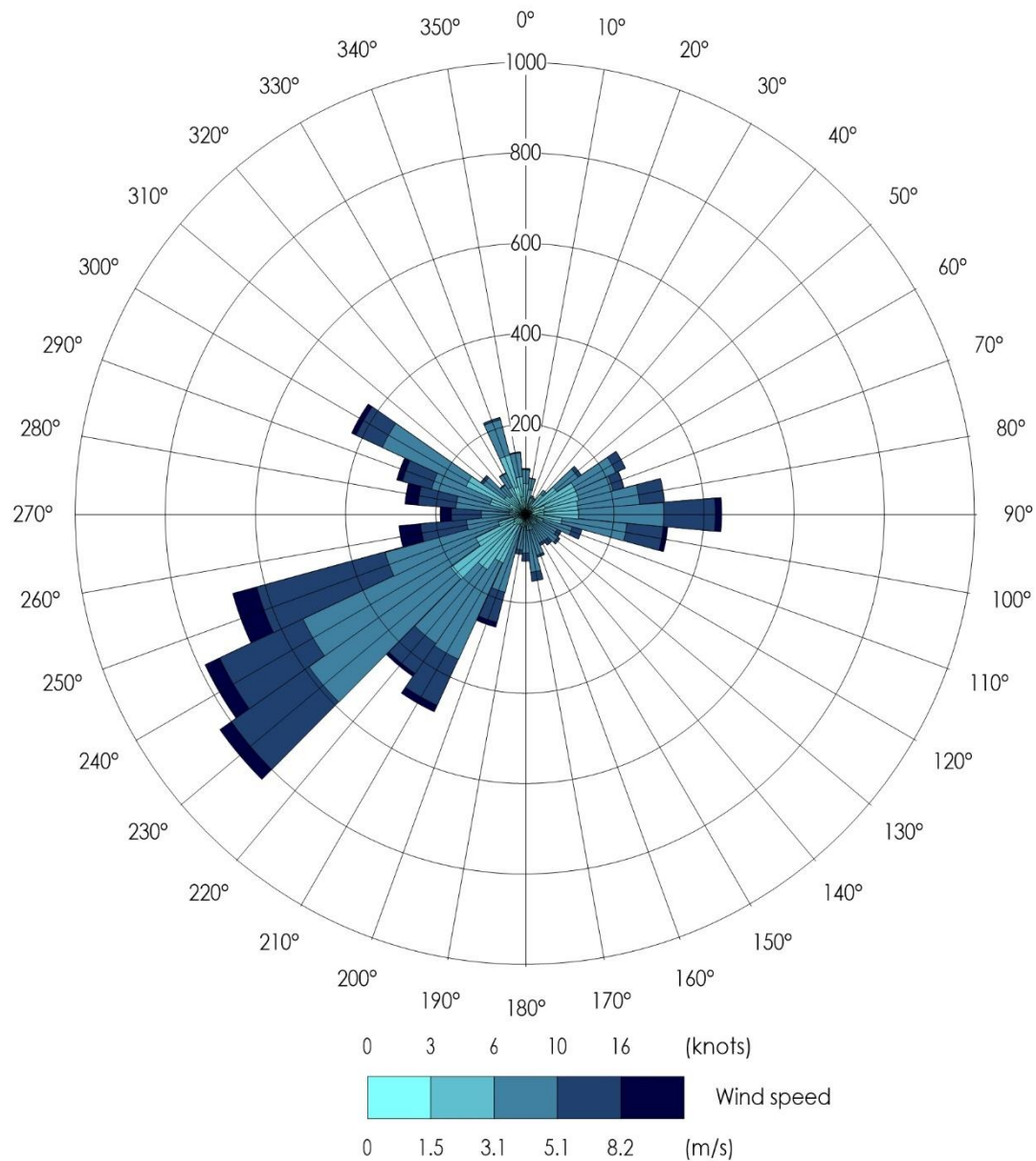
7.0 **ABBREVIATIONS**

AADT	Annual Average Daily Traffic
ADM	Atmospheric Dispersion Modelling
AQLV	Air Quality Limit Value
AQMA	Air Quality Management Area
AQO	Air Quality Objective
AQS	Air Quality Strategy
CERC	Cambridge Environmental Research Consultants
DEFRA	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DMP	Dust Management Plan
EB	Eastbound
GBC	Gravesham Borough Council
HDV	Heavy Duty Vehicle
IAQM	Institute of Air Quality Management
LA	Local Authority
LAQM	Local Air Quality Management
NGR	National Grid Reference
NO ₂	Nitrogen dioxide
NO _x	Oxides of nitrogen
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
SP	Slow Phase
WB	Westbound
Z ₀	Roughness length

Figures







Legend

Title
Figure 3 - Wind Rose of 2019
London City Airport Meteorological Data

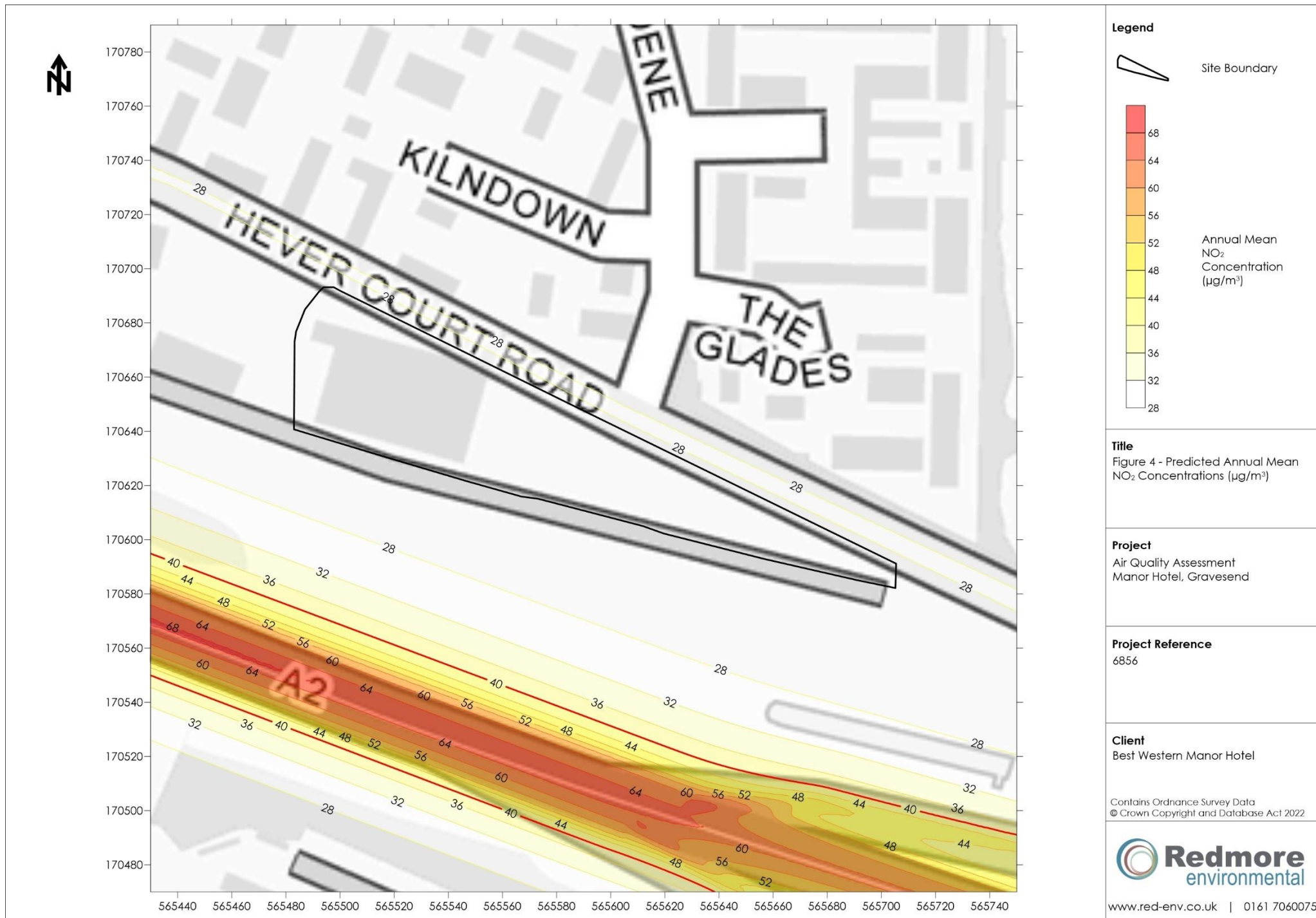
Project
Air Quality Assessment
Manor Hotel, Gravesend

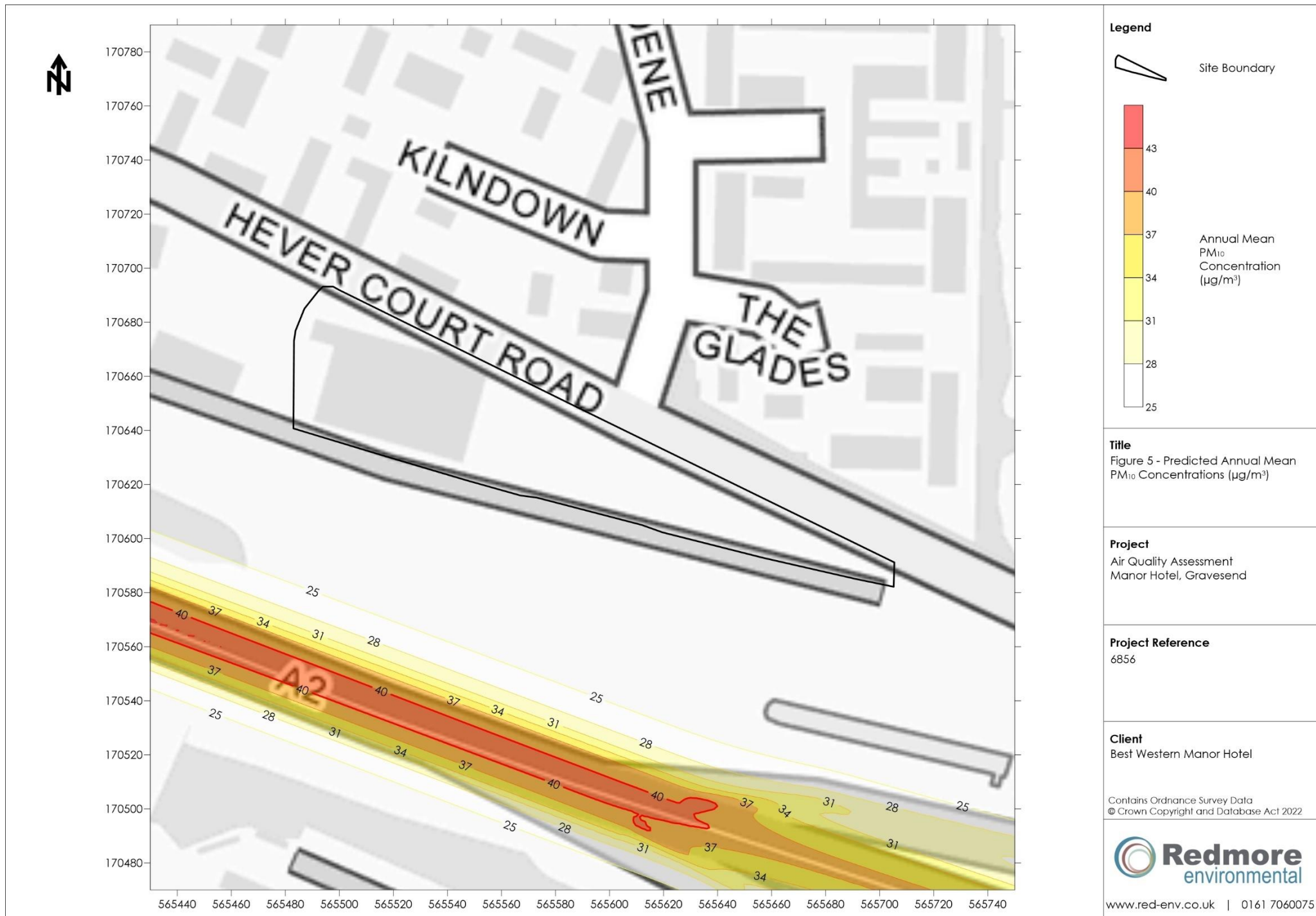
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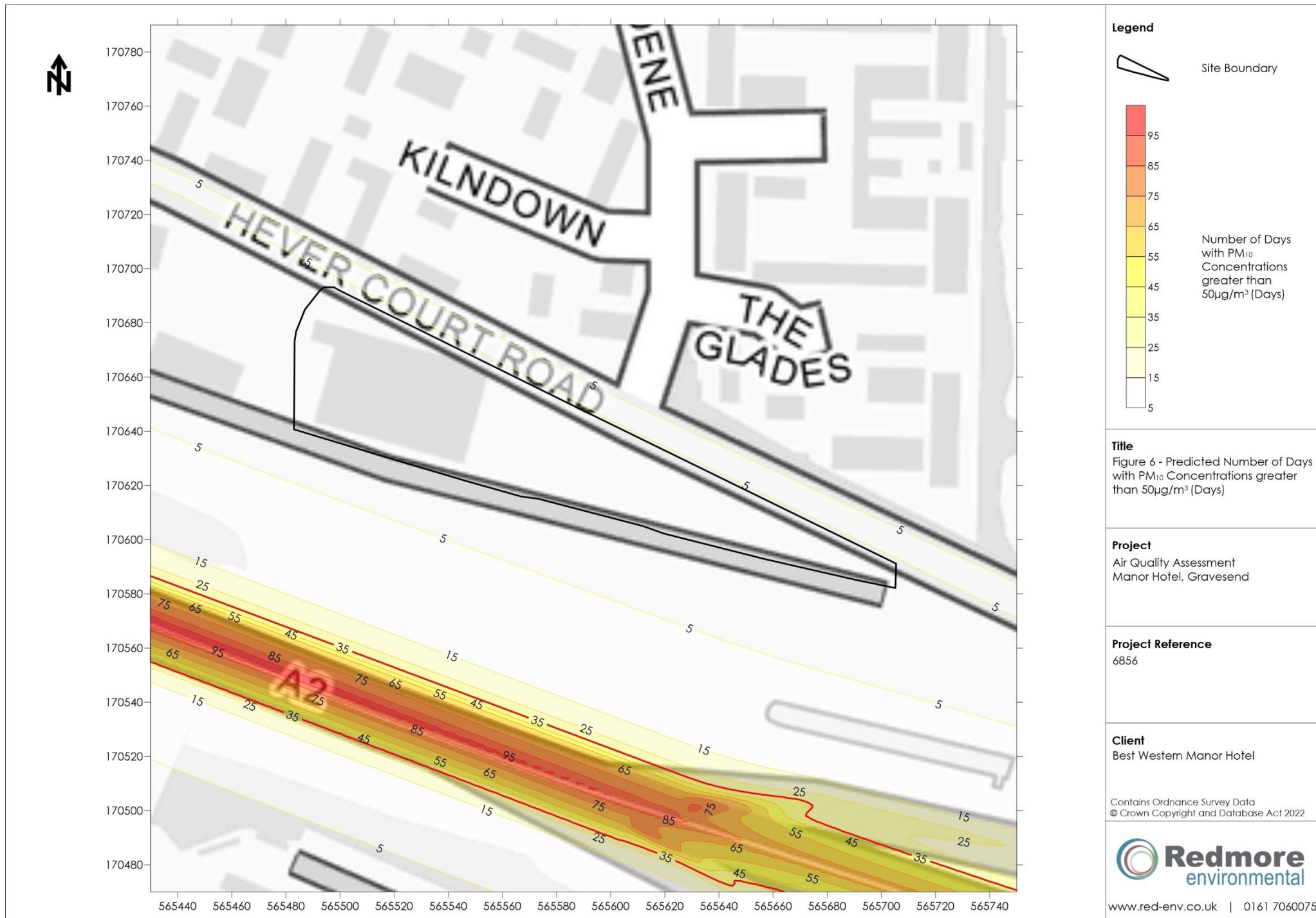
Client
Best Western Manor Hotel

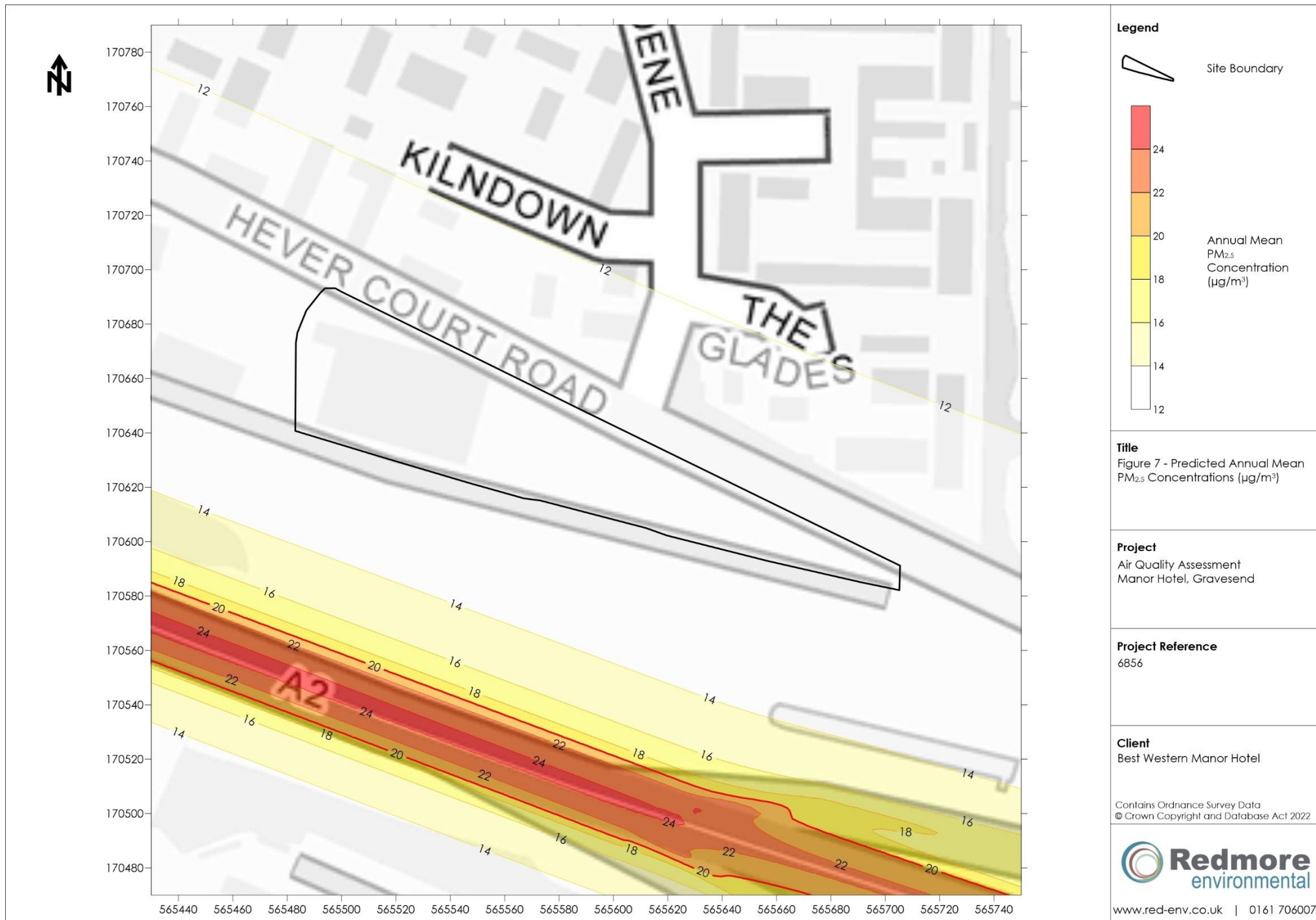


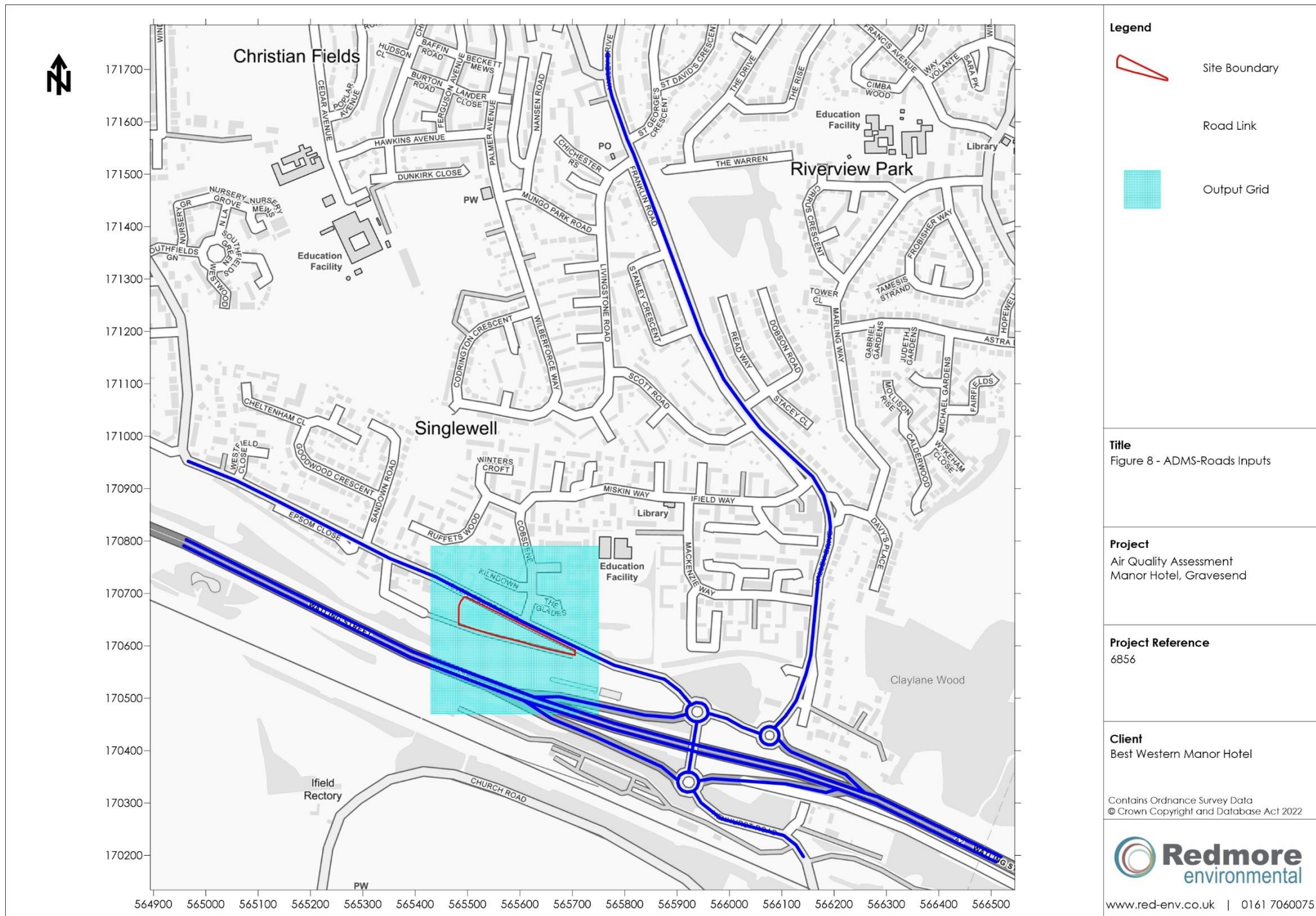
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Appendix 1 - Assessment Input Data

Introduction

The proposals have the potential to expose future residents to elevated pollution levels. In order to assess NO₂, PM₁₀ and PM_{2.5} concentrations across the development site, dispersion modelling was undertaken in accordance with the following methodology.

Modelling was undertaken for 2019 to allow verification against recent monitoring results and 2025 to represent likely conditions in the opening year of the scheme.

Dispersion Model

Dispersion modelling was undertaken using the ADMS-Roads dispersion model (version 5.0.1.3). ADMS-Roads is developed by Cambridge Environmental Research Consultants (CERC) and is routinely used throughout the world for the prediction of pollutant dispersion from road sources. Modelling predictions from this software package are accepted within the UK by the Environment Agency and DEFRA.

The model requires input data that details the following parameters:

- Assessment area;
- Traffic flow data;
- Vehicle emission factors;
- Spatial co-ordinates of emissions;
- Street width;
- Meteorological data;
- Roughness length (z_0); and,
- Monin-Obukhov length.

The following Sections detail the relevant inputs utilised in the assessment.

Assessment Area

The assessment area was defined based on the location of the development and roads likely to impact pollutant levels across the site. Ambient concentrations were predicted over NGR: 565430, 170470 to 565750, 170790. One Cartesian grid was used within the model to produce data suitable for contour plotting using the Surfer software package. It should be noted that

although the grid only covered the proposed site, source geometries were extended in order to ensure the impact of all relevant emissions in the vicinity of the scheme were considered.

Reference should be made to Figure 8 for a graphical representation of the assessment grid extents.

Traffic Flow Data

Baseline traffic data for use in the assessment, including 24-hour AADT flows and fleet composition as HDV proportion, was obtained from the Department for Transport (DfT)¹⁹. The DfT web tool enables the user to view and download traffic flows on every link of the 'A' road and motorway network, as well as selected minor roads, in Great Britain for the years 1999 to 2021. It should be noted that the DfT web tool is referenced in DEFRA guidance²⁰ as being a suitable source of data for air quality assessments and it is therefore considered to provide a reasonable estimate of traffic flows in the vicinity of the site.

Traffic data for Hever Court Road and Valley Drive were not available from the DfT. Flows from Coldharbour Road were therefore applied to these links in order to ensure all roads within the vicinity of the site were included in the model. Coldharbour Road is an unclassified road and links Hall Road and Earl Road, both minor roads, to the A2 Watling Street. In addition, it provides access to a large number of residential properties. Hever Court Road and Valley Drive link minor roads to the A2 Watling Street and, similarly to the aforementioned Coldharbour Road, provide access to a large number of residential dwellings. As such, comparable vehicle movements would be anticipated on these links. The data was therefore considered an appropriate representation of traffic flow in lieu of other sources.

The baseline traffic data was converted to the site opening year utilising a factor obtained from TEMPro (version 8.0). This software package has been developed by the DfT to calculate future traffic growth throughout the UK.

Road widths and vehicle speeds were estimated from aerial photography and UK highway design standards. A summary of the traffic data used in the assessment is provided in Table A1.1.

¹⁹ <https://roadtraffic.dft.gov.uk/#6/55.254/-11.107/basemap-regions-countpoints>.

²⁰ Local Air Quality Management (TG22) Technical Guidance, DEFRA, 2022.

Table A1.1 Traffic Data

Link		24-hour AADT Flow		HDV Prop. Of Fleet (%)	Road Width (m)	Avg. Vehicle Speed (km/h)
		2019	2025			
L1	Hever Court Road	12,671	13,225	1.55	6.6	65
L2	Hever Court Road Slow Phase (SP)	12,671	13,225	1.55	11.6	20
L3	Hever Court Road between roundabouts SP	12,671	13,225	1.55	10.7	20
L4	Valley Drive SP	12,671	13,225	1.55	11.8	20
L5	Valley Drive	12,671	13,225	1.55	7.2	45
L6	Henhurst Road between roundabouts over A2 SP	12,671	13,225	1.55	10.7	20
L7	Henhurst Road	3,017	3,149	0.17	6.8	95
L8	A8 Watling Street Westbound (WB) north of slip road	70,206	73,281	8.06	15.3	95
L9	A8 Watling Street WB between slip roads	50,234	52,435	8.55	15.3	95
L10	A8 Watling Street WB south of slip road	63,752	66,544	8.55	15.3	95
L11	A8 Watling Street Eastbound (EB) south of slip road	69,671	72,723	8.33	15.3	95
L12	A8 Watling Street EB between slip roads	54,357	56,738	8.33	15.3	95
L13	A8 Watling Street EB north of slip road	75,281	78,578	7.92	15.3	95
L14	A8 Watling Street EB slip road to Henhurst Road	17,418	18,181	8.33	9.2	45
L15	Slip road to A8 Watling Street EB	18,820	19,645	7.92	3.9	95
L16	A8 Watling Street WB slip road to Henhurst Road	17,552	18,320	8.06	6.1	45
L17	Slip road to A8 Watling Street WB	15,938	16,636	8.55	3.7	95
R1	Hever Court Road roundabout	13,796	14,400	8.06	8.3	20
R2	Henhurst Road roundabout	12,950	13,517	8.33	8.2	20
R3	Hever Court Road/Valley Drive roundabout	13,675	14,274	8.55	7.9	20

Reference should be made to Figure 8 for a graphical representation of the road link locations.

Emission Factors

Emission factors for each link were calculated using the relevant traffic flows and the Emissions Factor Toolkit (version 11.0). This has been produced by DEFRA and incorporates COPERT 5.3 vehicle emission factors and fleet information.

Meteorological Data

Meteorological data used in the assessment was taken from London City Airport meteorological station over the period 1st January 2019 to 31st December 2019 (inclusive). London City Airport is located at NGR: 542739, 180487, which is approximately 24.8km north-west of the development. It is anticipated that conditions would be reasonably similar over a distance of this magnitude. The data was therefore considered suitable for an assessment of this nature.

All meteorological records used in the assessment were provided by Atmospheric Dispersion Modelling (ADM) Ltd, which is an established distributor of data within the UK. Reference should be made to Figure 3 for a wind rose of utilised meteorological data.

Roughness Length

The z_0 is a modelling parameter applied to allow consideration of surface height roughness elements. A z_0 of 0.5m was used to describe the modelling extents. This is considered appropriate for the morphology of the area and is suggested within ADMS-Roads as being suitable for 'parkland, open suburbia'.

A z_0 of 0.1m was used to describe the meteorological site. This value is considered appropriate for the morphology of the area due to the large expanse of surrounding flat land use, such as runways, grassland and open water, and is suggested within ADMS-Roads as being suitable for 'root crops'.

Monin-Obukhov Length

The Monin-Obukhov length provides a measure of the stability of the atmosphere. A minimum Monin-Obukhov length of 30m was used to describe the modelling extents. This value is considered appropriate for the nature of the area and is suggested within ADMS-Roads as being suitable for 'cities and large towns'.

A minimum Monin-Obukhov length of 100m was used to describe the meteorological site. This value is considered appropriate for the nature of the area and is suggested within ADMS-Roads as being suitable for 'large conurbations > 1 million'.

Background Concentrations

Background NO₂, PM₁₀ and PM_{2.5} concentrations for use in the assessment were obtained from the DEFRA mapping study for the grid square containing the site, as shown in Table 11.

NO_x to NO₂ Conversion

Predicted annual mean NO_x concentrations were converted to NO₂ concentrations using the spreadsheet (version 8.1) provided by DEFRA, which is the method detailed within DEFRA guidance²¹.

Verification

The predicted results from a dispersion model may differ from measured concentrations for a large number of reasons, including:

- Estimates of background concentrations;
- Uncertainties in source activity data such as traffic flows and emission factors;
- Variations in meteorological conditions;
- Overall model limitations; and,
- Uncertainties associated with monitoring data, including locations.

Model verification is the process by which these and other uncertainties are investigated and where possible minimised. In reality, the differences between modelled and monitored results are likely to be a combination of all of these aspects.

For the purpose of the assessment, model verification was undertaken for 2019 using traffic data, meteorological data and monitoring results from this year. The choice of 2019 as the verification

²¹ Local Air Quality Management Technical Guidance (TG22), DEFRA, 2022.

year aligns with the IAQM position statement 'Use of 2020 and 2021 Monitoring Datasets'²², which states:

"If you are carrying out an air quality study that includes validation against monitoring data, use 2019 monitoring data as the last typical year"

Monitoring of NO₂ concentrations was undertaken at one location within the vicinity of roads included in the model during 2019. The result was obtained and the road contribution to total NO_x concentration calculated following the methodology contained within DEFRA guidance²³. The monitored annual mean NO₂ concentration and calculated road NO_x concentration is summarised in Table A1.4.

Table A1.4 NO_x Verification - Monitoring Result

Monitoring Location		Monitored NO ₂ Concentration (µg/m ³)	Calculated Road NO _x Concentration (µg/m ³)
GR110	Nells Café, Valley Drive, Gravesend	38.70	33.61

The annual mean road NO_x concentration predicted from the dispersion model and the 2019 road NO_x concentration calculated from the monitoring result is summarised in Table A1.5.

Table A1.5 NO_x Verification - Modelling Result

Monitoring Location		Calculated Road NO _x Concentration (µg/m ³)	Modelled Road NO _x Concentration (µg/m ³)
GR110	Nells Café, Valley Drive, Gravesend	33.61	19.27

The monitored and modelled road NO_x concentrations were compared to calculate the associated ratio. This indicated a verification factor of 1.7438 was required to be applied to all modelling results.

²² Use of 2020 and 2021 Monitoring Datasets, IAQM, 2021.

²³ Local Air Quality Management Technical Guidance (TG22), DEFRA, 2022.

Monitoring of PM₁₀ or PM_{2.5} concentrations was not undertaken within the assessment extents. The NO_x verification factor was therefore used to adjust model predictions of these species in lieu of more accurate data in accordance with DEFRA guidance²⁴.

²⁴ Local Air Quality Management Technical Guidance (TG22), DEFRA, 2022.

Date: 16th June 2023

Ref: 6856

Appendix 2 - 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.

EMILY MACEY

Senior Air Quality Consultant



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KEY PEXPERIENCE:

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.

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 were not significant.

KEY EXPERIENCE:

Emily is an Associate Director 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 and industrial emissions using ADMS-Roads and ADMS-5. 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.
- Assessment of fugitive dust impacts from a range of mineral extraction developments.
- Assessment of petrol stations to address benzene concentrations and their impact on adjacent developments.
- Production of air quality mitigation strategies specifically tailored to address issues at individual sites.
- Assessment of potential effects associated with network realignment schemes and highway developments.

SELECT PROJECTS SUMMARY:

Broad Street, Birmingham

Air Quality Assessment in support of a residential-led development on land at Broad Street, Birmingham. The proposals were located adjacent to a section of the Midland Metro Westside which runs along Broad Street. Consideration was made to the potential for re-alignment of the local road network as a result of the Metro to effect pollution levels at the development. The assessment indicated NO₂ concentrations exceeded air quality criteria from ground to third floor level as a result of road vehicle exhaust emissions. Mitigation was therefore specified for the affected units.

Home Farm, Forest Road, Warfield

Ecological Air Quality Assessment in support of a residential development. Natural England held concerns regarding potential impacts at sensitive ecological designations as a result of traffic exhaust emissions associated with the development. The predicted change in NO_x and ammonia concentrations and nitrogen and acid deposition was below the relevant criteria at all locations within the ecological designations. Impacts were therefore not considered to be significant.

Saltcoats Road, Stevenston

Air Quality Assessment in support of an educational campus and associated energy centre. Impacts associated with emissions from the proposed gas and biomass boilers were assessed through detailed dispersion modelling. This indicated impacts on annual mean NO₂ and PM₁₀ concentrations were predicted to be not significant.

Blackthorn & Piddington

Environmental Impact Assessment in support of a railway embankment scheme on land at the Network Railway Embankment between Piddington and Blackthorn. Due to the extensive stabilisation works a Fugitive Dust Emissions Assessment was undertaken in addition to consideration of road vehicle exhaust emissions. Due to the location of the site in relation to nearby sensitive receptors, potential impacts associated with construction works were not considered to be significant.

Blackmoorfoot Road, Huddersfield

Air Quality in support of a residential-led development in close proximity to an operational minerals facility. Due to the presence of the Johnsons Wellfield Quarry to the south of the site a Fugitive Dust Emissions Assessment was undertaken to determine potential impacts. Dispersion modelling of road vehicle exhaust emissions was also undertaken in support of the scheme. Results indicated the overall significance of fugitive dust emissions from the quarry and air quality impacts associated with operation of the development itself were not significant.

Lockwood Bar, Huddersfield

Air Quality Assessment for the proposed highway realignment scheme along Lockwood Road, Huddersfield. Changes in pollution levels were considered at sensitive receptors as a result of variations to road geometry and associated redistribution of vehicle trips across the local area. Results of the dispersion modelling study indicated air quality impacts as a result of the scheme were not significant.