

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2021/93150 Lowdham Leisureworld, Crosland Hill Road, Crosland Moor, Huddersfield, HD4 5NU		
Residential development for 87 dwellings including demolition of existing buildings and ground works, provision of open space, landscaping and on-site infrastructure		
Date Responded: 14th February 2022	Responding Officer: Rebecca Muff	Responding Ref: WK/2021/27160
Air Quality In our previous comments on 28th October 2021 we referred to the Air Quality Impact Assessment submitted by Stroma Built Environment (ref: 05-21-87740) (dated: July 2021). The assessment considers the impact of the development on air quality during the construction and operational phases. We accepted the methodology and concurred with the conclusions and mitigation measures proposed for the construction phase of the assessment. However, there are too many uncertainties and omitted information to provide us with confidence in the model outputs for the operational phase. Since then, a revised Air Quality Impact Assessment has been submitted by Stroma Built Environment (Ref: 05-21-87740) (Dated: November 2021) in addition to a response to the concerns that we had previously raised, as follows: • Clarification has been provided that the assessment has been undertaken in accordance with the West Yorkshire Low Emission Strategy (WYLES) -Technical Planning Guidance. • An explanation of why the model verification factor was higher than expected at 5.396 has been provided. The report also states that it demonstrates a worse-case conservative approach and that the Route Mean Square Error (RMSE) which was calculated to be 6.4 was within the acceptable parameters as defined by Local Air Quality Management Guidance (TG16). • A surface roughness of 0.02m (ie. open and flat) was used for the meteorological data which was taken from Leeds-Bradford Airport, which is characteristic of 'open grassland'. • In our original comments we raised concerns that the assessment hadn't considered the additional number of vehicle trips generated because of the development. Table 3 of the revised Air Quality Assessment has been amended to provide a breakdown for the future baseline traffic, based on the assumption that the percentage HGVs and speed will remain unchanged in future years. Furthermore, it is stated that in accordance with WYLES this doesn't meet the requirement for a major (impact) and an exposure impact was undertaken as per section 4.2.1 of the report. • Johnsons Wellfield Quarry was not considered as part of the assessment because the quarry lies to the southeast, and the mining operations are more than 200 metres away from the proposed development site. In addition, the prevailing wind direction is unlikely to have an impact on the development. Furthermore, traffic related with the		

quarry will be included in the traffic statistics used, thus a cautious approach has been taken.

Having considered the additional information that has been provided, we are now satisfied that our original concerns have been adequately answered. We accept the methodology of the assessment and concur with the conclusions, that all predicted NO₂ and PM₁₀ concentrations at the receptor locations are below the current national air quality objectives, therefore the proposed development will not be introducing new exposure. We also concur with the methodology and mitigation measures proposed for the construction phase of the assessment.

Overall, we accept the revised Air Quality Assessment by Stroma Built Environment (ref: 05-21-87740) (dated: November 2021), therefore Condition AQIAC1 Air Quality Impact Assessment – Impact of new development on the area is no longer necessary. However, we recommend the following condition relating to dust impacts during the construction phase.

For clarity all other conditions remain.

RECOMMENDED CONDITIONS

Dust1 Implement agreed Dust Mitigation Scheme – Condition

Before any demolition and /or construction work commences, the mitigation measures to control fugitive dust emissions during the demolition and construction phase of the development shall be implemented in accordance with those detailed in (Table 17 of the Air Quality Assessment by Stroma Built Environment (ref: 05-21-87740) (dated: November 2021) and retained for the duration of the demolition and construction period.

Reason: To safeguard the amenities of the occupiers of nearby properties in accordance with part 15 of the NPPF and xxxxx of the Local Plan

