

CLIENT:	Lidl GB LTD
PROJECT:	Proposed Lidl Foodstore, Crosland Moor
SUBJECT:	Air Quality Technical Note
JOB NO.:	GM12449
DATE:	14 th September 2023
PREPARED BY:	Dr Paul Sanderson / Mariam Weatherley
APPROVED BY:	Malcolm Walton

Introduction

It is understood that an air quality technical note is required in relation to planning application Reference: LICH-DMS.FID204230 for a proposed Lidl store at the former St Luke's Hospital Site, Blackmoorfoot Road, Crosland Moor, Huddersfield.

A detailed air quality assessment as part of the planning application was previously undertaken in April 2023 by Wardell Armstrong LLP who have since been requested to review a revised site layout and store format at the Site to determine if the air quality assessment requires updating as a result of the relocation of the store to the eastern part of the site, as well as to address consultation responses relating to air quality, from Kirklees Council (KC), dated 14th June 2023.

Air Quality Comments raised by Kirklees Council

The comments received regarding air quality matters from KC Environmental Health (Pollution & Noise Control) on 14th June 2023 for planning application LICH-DMS.FID204230 with responding reference, WK202315680 is as follows:

"In principle, we agree with the approach and methodology of the Air Quality Assessment (ref: GM12449) (version: V0.2) (dated: 05/04/2023) by Wardell Armstrong. However, the nearest Air Quality Management Area to the site is AQMA10 (Manchester Road) 0.77km North West of the site. The report refers to AQMA 9 and therefore the conclusions of the report are questioned. In particular there are inconsistencies with the information provided regarding the nearest AQMA and the sensitive receptors and this requires further clarification.

We make the following comments:

- *It is necessary for a condition requiring a revised Air Quality Impact Assessment*

- *We recommend a dust mitigation plan to be provided as part of a Construction Environmental Management Plan (CEMP)*
- *We acknowledge the provision of an EV charging point but consider that one is not sufficient for a development of this size and consider 3 fast (7-23kW) or 2 Rapid (43kW+) charging points to be more appropriate. Therefore, a condition will be necessary for a scheme relating to electric vehicle charging points.”*

Implications of changes for existing assessment work

Construction Dust Impacts

The relocation of the proposed development, to be moved to the eastern corner of the Site, is not likely to result in greater construction dust impacts than the already assessed level within the WA April 2023 Air Quality Assessment, which concludes that with site specific mitigation measures in place, the significance of dust and fine particulate effects from earthworks, construction and trackout is considered to be not significant. It is therefore not anticipated that there will be any additional impacts which will result in changes to the conclusions of the construction dust assessment carried out for the original planning application, in that the dust risk categories and significance of impact will remain the same.

Operational Phase Impacts

It is not anticipated that re-modelling of the operational phase will be required as a result of the relocation of the store, since if the access has been modified as described, i.e. moving to the east, it is expected that this rearrangement of the site moves the parking areas further from the receptors so pollutant emissions to air and subsequent potential air quality impacts would be less.

Taking this into account, it is considered that the revised amendments to the proposed scheme will not have an adverse impact through development-generated traffic in the operational phase and that the air quality impact at sensitive receptors, specifically those around the southern/eastern boundaries will be reduced compared to those assessed for the original planning application.

Review of Kirklees Council Comments

The Environmental Health Officer states that the air quality assessment has not considered AQMA 10. This has since been reviewed and it has been determined that this specific AQMA has been omitted from the online DEFRA AQMA Interactive Map Tool used to provide air quality assessors with information on the locations of AQMAs across the UK. Upon further review of the air quality dispersion model used for the assessment, it has been established

that the previously assessed sensitive receptors remain valid in order to inform the level of impact on AQMA 10; this is because they are either inside or adjacent to AQMA 10. Furthermore, model verification was undertaken using diffusion tubes in AQMA 10 and consequently the adjustment factor applied to modelled results is considered representative. In addition, the modelled baseline concentrations at the assessed sensitive receptor locations are all below the objective levels, which remain below with the proposed development in place. The predicted impact of the proposed development at these sensitive receptors is negligible and it is therefore considered that the air quality assessment does not predict any adverse impacts at any sensitive receptors within AQMA 10.

In terms of the requirement for a Dust Management Plan by Environmental Health, it is understood that this would be required as part of a condition, should planning permission be granted and therefore will be considered at a later stage, where appropriate. A proposed condition relating to the number and size of EV charging points, as mentioned in the KC comments, is noted.

Conclusion

Based on the review of the information provided regarding the development proposals for the amended development proposals, it is considered that the existing assessment work remains suitable for use and it is not considered that the development proposals introduce any new significant impact on air quality, either in terms of the construction phase or of the operational phase of the proposed development. In addition, it is considered that the original Air Quality Assessment adequately considers sensitive locations within the nearest AQMA, AQMA 10 to the proposed development without having to undertake any further assessment. As such, it is considered that the results and conclusions of the existing air quality assessment in line with national policy are acceptable in terms of proceeding with the proposed development.