

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2023/92906 Centurion House, Centurion Way, Cleckheaton, BD19 3QB		
Discharge of condition 3 (Air Quality Impact Assessment) of previous permission 2022/92271 for demolition of Centurion House, erection of petrol filling station and ancillary unit with drive-thru and associated works		
Date Responded: 8 th November 2023	Responding Officer: RM	Responding Ref: WK/2032726
<p>Condition 3 – Air Quality Impact Assessment To discharge condition 3 an Air Quality Impact Assessment (ref: DC4377-AR1) (Dated 29.09.23) by Dragonfly Consulting has been submitted.</p> <p>The report details the impact of the development during the construction and operational phases on existing air quality and assesses the likely impact that traffic generated by the development will have on local air quality and how this will impact existing sensitive receptors.</p> <p><u>Construction Phase</u> For the construction phase, a qualitative assessment of fugitive dust emissions was undertaken in accordance with the Institute of Air Quality Management Guidance (IAQM) on the Assessment of Dust Demolition and Construction. This involved a risk assessment to identify all potential sources of dust during the construction phase and the risk of impact at all sensitive receptor locations within 350m of the site boundary. The report concludes that the proposed development has been identified as a medium-risk for dust soiling effects and a low or negligible-risk site during demolition, construction and trackout. For human health, the site has been identified as a negligible risk. It goes on to say that with the implementation of appropriate dust mitigation as set out in Appendix C of the report, the potential for fugitive dust emissions during the construction phase would be negligible.</p> <p><u>Operational Phase</u> For the operational phase, detailed dispersion modelling using ADMS Roads (v5.0.1.3) was used to predict changes in pollutant concentrations due to additional traffic generated by the development at 7 sensitive receptor locations. The assessment was undertaken in accordance with Defra guidance using the latest Defra Vehicle Emission Factors Toolkit (EFT), Defra background concentrations, and monitored data taken from Kirklees Councils Annual Status Report (ASR). Traffic data obtained from Dynamic Transport Planning Ltd, the transport consultants for the development was also used in the model. Using this data concentrations of NO₂, PM₁₀ and PM_{2.5} were predicted at receptors for the following scenarios:</p> <ul style="list-style-type: none"> • Baseline (verification) year 2019 • Future year without the proposed development 2024 (Do Minimum- DM) • Future year with the proposed development 2024 (Do Something- DS) <p>The report concludes that the concentrations of all pollutants are predicted to be below their respective air quality objectives at all sensitive receptor locations. Overall, the development is predicted to have an overall negligible impact on air quality.</p>		

In accordance with the West Yorkshire Low Emission Strategy – Technical Planning Guidance (WYLES) a damage cost calculation was undertaken to determine the amount (value) of mitigation required to offset the detrimental impact that the development will have on air quality. The calculation was undertaken in accordance with current DEFRA guidance and provides a five-year exposure value to the sum of £7,650. The proposed mitigation measures include 2 charging points per 23 proposed car parking spaces, and a travel plan. The cost of these is expected to surpass the calculated damage costs.

We accept the methodology and conclusion of the Air Quality Assessment and make the following recommendation.

Recommendation

Condition 3- Air Quality Impact Assessment

We accept the Air Quality Impact Assessment by Dragonfly Consulting (ref: DC4377-AR1) (Dated 29.09.23) and recommend that condition 3 can be discharged.