

PENNINE VIEW, BATLEY - AIR QUALITY NOTE

Redmore Environmental Ltd was commissioned by Heatons to undertake an Air Quality Assessment in support of a planning application for the change of use of a paper/card recycling facility at Pennine View, Batley, to incorporate a waste transfer station. Following submission of the application (reference: 2024/90698), a consultation response was received from Kirklees Council Environmental Health (Pollution & Noise Control) (reference: WK/202410922). This outlined the following concerns in relation to the predicted number of vehicle trips generated by the development:

"We have concerns regarding several contradictions relating to predicted vehicle moments generated by the proposed development as follows:

- Table 18 page 25 states "off-site transportation is predicted to be between 25 and 200 HDV movements in any one day.
- Para 5.4.1 states that "Information provided by the Applicant indicated that the facility is predicted to produce 42 HDV trips per day as an AADT flow"
- The Planning Statement by Heatons (dated: February 2024) states "The proposed development will result in up to an additional 100 two-way HGV movements per day, with an average forecasted figure of 75 two-way HGV movements per day. This figure includes HGV movements associated with the proposed WTS and paper /cardboard recycling."

Clarification is required regarding the total number of HDV movements predicted to be generated by the development."

It is confirmed that the information provided in the application is correct and the discrepancy is how the different data is presented. This is explained below.

It is anticipated that the development will generate 100 Refuse Collection Vehicle (RCV) and Front End Loader (FEL) trips per week for the importation of waste. This is equal to 200 movements on any one link. It is anticipated that the development will generate 45 Heavy Goods Vehicle (HGV) trips per week for the export of material. This is equal to 90 movements on any one link. Cumulatively this equals 290 movements per week. Dividing by 7 provides an Annual Average Daily Traffic (AADT) flow of 41.4, which was rounded to 42 within the Air Quality Assessment.

The above value of 42 was utilised in the Fugitive Dust Emissions Assessment, as summarised in Table 18 page 25, which requires the number of HDV movements to be categorised in accordance with the criteria outlined in Table 3. The relevant categorisation for 42 movements is 'Total HDV movements between 25 and 200 movements in any one day'. The text is therefore correct.

The information included in the planning statement details maximum daily movements, rather than AADT flow used in the Air Quality Assessment. As such, the values are not comparable.

Based on the above, the information provided in the Air Quality Assessment is correct. The development is therefore not predicted to result in an increase of HDV flow of more than 100 AADT on any individual road link. As such, potential air quality impacts associated with operational phase road vehicle exhaust emissions are predicted to be **not significant**, in accordance with the Institute of Air Quality Management (IAQM)¹ guidance and no further assessment is required.

We trust the above clarifies the assessment inputs and conclusion and allows the report to be accepted by Kirklees Council Environmental Health (Pollution & Noise Control).

Technical Note produced by Jethro Redmore, Director, Redmore Environmental, on 24th May 2024

¹ Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.
