

ENVIRONMENT

Frank Shaw Associates
Fernside SEND School
Huddersfield
Air Quality Assessment

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Huddersfield
Air Quality Assessment

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July 2024

DOCUMENT ISSUE RECORD

Document Number:	22315-BWB-XX-ZZ-LA-RP-002_AQA
BWB Reference:	221770-002-AQA

Revision	Date of Issue	Status	Author:	Checked:	Approved:
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EXECUTIVE SUMMARY

BWB Consulting Limited was appointed by Frank Shaw Associates to undertake an air quality assessment for a full planning application for a new Special Educational Needs and Disability School on land to the south-east of Fernside Avenue, in the Almondbury district of Huddersfield. The SEND school will provide purpose-built facilities and the intake will comprise of the closure of Woodley School and College, located along Dog Kennel Bank to the west of the Site and current staff and students will transfer to the new Site off Fernside Avenue.

The Site is located within the administrative area of Kirklees Council. The Site is not located within an existing Air Quality Management Area.

A qualitative construction phase dust assessment was undertaken in accordance with Institute of Air Quality Management guidance and measures were recommended to minimise emissions during construction activities. With the implementation of these mitigation measures the impact of construction phase dust emissions was considered to be 'not significant' in accordance with Institute of Air Quality Management guidance.

The predicted development trip generation was screened using the Institute of Air Quality Management and Environmental Protection UK two stage screening process, to determine whether a detailed road traffic emissions impact assessment was required. The proposed development trip generation did not exceed the relevant screening criteria and therefore detailed dispersion modelling of development-generated road traffic was not undertaken.

Consideration was given to the West Yorkshire Low Emissions Strategy Technical Planning Guidance, and the development was categorised as a 'Medium' development. In accordance with the West Yorkshire Low Emissions Strategy Technical Planning Guidance, a 'Medium' development requires an exposure assessment. Monitoring data in the vicinity of the Site indicates that pollutant concentrations are below the current relevant air quality objectives for England. In addition, the Site is located away from any major road sources, therefore it can be considered that pollutant concentrations at the Site are also likely to be below the current relevant air quality objectives for England. The proposed development was therefore considered to be suitable for the proposed sensitive use with regard to the current relevant air quality objectives for England.

Whilst no further mitigation is required, the development was categorised as a 'Medium' development. Therefore Type 1 and 2 mitigation measures are required in accordance with the West Yorkshire Low Emissions Strategy Technical Planning Guidance and as such are included in the development proposal. The proposed development includes Electric Vehicle charging points. These development measures therefore adhere to the requirements of Type 1 and 2 mitigation measures and no further mitigation is required.

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1. INTRODUCTION

- 1.1 BWB Consulting Limited (BWB) has been appointed by Frank Shaw Associates Limited ("the Applicant") to produce an Air Quality Assessment report to support a full planning application for a new Special Educational Needs and Disability (SEND) School on the land to the south-east of Fernside Avenue in the Almondbury district of Huddersfield ("the Site"). The SEND school will provide purpose-built facilities and the intake will comprise of the closure of Woodley School and College, located along Dog Kennel Bank to the west of the Site and current staff and students will transfer to the new Site off Fernside Avenue.
- 1.2 The assessment considers construction phase dust impacts and operational phase road traffic emissions. A qualitative construction phase dust assessment was undertaken in accordance with relevant guidance. An operational phase road traffic emissions screening assessment was undertaken to consider the requirement for a detailed assessment of additional vehicles generated by the proposed development. In addition, an exposure assessment was undertaken to determine the suitability of the Site for its proposed educational use with regard to the current relevant air quality objectives for England. The West Yorkshire Low Emissions Strategy (WYLES) Technical Planning Guidance was considered as part of the assessment.
- 1.3 This report is necessarily technical in nature so to assist the reader a glossary of air quality terminology can be found in **Appendix A**.

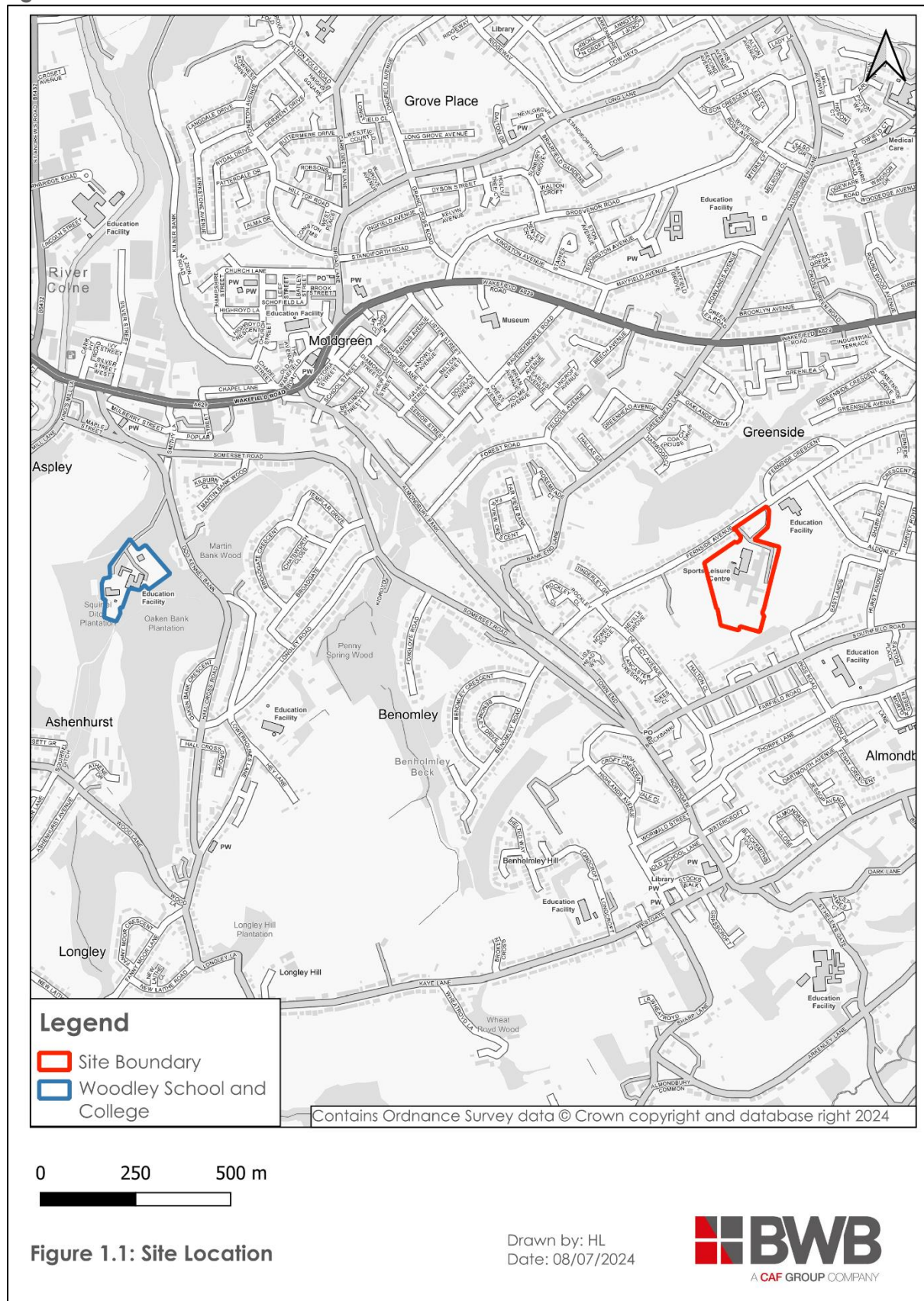
Site Setting

- 1.4 The Site is located to the south of Fernside Avenue in Almondbury, Huddersfield within the administrative area of Kirklees Council (KC). The Site is not located within an existing Air Quality Management Area (AQMA). The closest AQMA is the Kirklees AQMA No.9 located approximately 1.1km west of Site in central Huddersfield.
- 1.5 The Site currently comprises the former Almondbury Community School which provided education to ages 3 to 16. The former students have now been transferred to other schools in the area.
- 1.6 The Site is bound by Fernside Avenue and residential properties to the north, with residential dwellings beyond. Approximately 20m to the northeast is the Hill View Academy (was Greenside Infant and Nursery School). To the east and south are existing school fields with residential dwellings beyond. To the west is Almondbury Cricket Club and residential dwellings beyond.
- 1.7 **Figure 1.1** details the location of the proposed development and the existing Woodley School and College site.
- 1.8 Principal air pollution sources in the vicinity of the Site are likely to comprise road emission sources from Fernside Avenue and surrounding residential roads.

Proposed Development

- 1.9** The proposed development comprises purpose-built facilities for a new SEND School for the intake of students following the closure of the Woodley School and College. The proposed development will accommodate a maximum of 180 students, which will be an increase of 21 students compared to existing use of the Woodley School and College. The proposed development masterplan is detailed in **Appendix B**.

Figure 1.1: Site Location



2. LEGISLATION, PLANNING POLICY & GUIDANCE

National Legislation and Planning Policy

2.1 The following national legislation and planning policy is relevant to air quality and was considered in the undertaking of the assessment. A summary of the relevant national legislation and planning policy is provided in **Appendix C**:

- European Parliament, EU 2008 ambient Air Quality Directive (2008)¹;
- HMSO, Air Quality (England) Regulations (2000)²;
- HMSO, Environment Act (1995)³;
- HMSO, Environment Act (2021)⁴;
- HMSO, Air Quality (England) Regulations (2002)⁵;
- HMSO, Air Quality Standards Regulations (2010)⁶;
- Department for Environment, Air Quality Strategy (1997)⁷;
- Department for the Environment, Food and Rural Affairs, Air Quality Strategy (2007)⁸;
- Department for the Environment, Food and Rural Affairs, Air Quality Strategy (2023)⁹;
- Department for the Environment, Food and Rural Affairs, The Environment (Miscellaneous Amendments) (EU Exit) Regulations (2020)¹⁰;
- HMSO, The Environmental Targets (Fine Particulate Matter) (England) Regulations (2023)¹¹;
- Ministry of Housing, Communities and Local Government, National Planning Policy Framework (NPPF) (2023)¹²; and
- Ministry for Housing, Communities and Local Government, Planning Practice Guidance (PPG) for air quality (2019)¹³.

Local Planning Policy

2.2 The following local planning policy was considered in the undertaking of the assessment and a summary is provided in **Appendix C**:

- Kirklees Council, Kirklees Local Plan Strategy and Policies (2019)¹⁴.

¹ European Parliament (2008) Council Directive 2008/50/EC on Ambient Air Quality and Cleaner Air for Europe

² HMSO (2000) Statutory Instrument 2000 No. 928, The Air Quality (England) Regulations 2000 (as amended), London: HMSO

³ HMSO (1995) The Environment Act 1995, London: TSO

⁴ HMSO (2021) The Environment Act 2021, London: TSO

⁵ HMSO (2002) Statutory Instruments 2002 No. 3043, The Air Quality (England) (Amendment) Regulations 2002, London: HMSO

⁶ HMSO (2010) Statutory Instruments 2010 No. 1001 Air Quality Standards Regulations 2010. London: HMSO

⁷ Department of the Environment (DoE) (1997) The UK National Air Quality Strategy, London: HMSO

⁸ Department of the Environment, Food and Rural Affairs (Defra) (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, London: HMSO

⁹ Department for the Environment, Food and Rural Affairs (Defra) (2023) Air Quality Strategy: Framework for Local Authority

¹⁰ Department of the Environment, Food and Rural Affairs (Defra) (2020) The Environment (Miscellaneous Amendments) (EU Exit) Regulations, London: HMSO

¹¹ HMSO (2023) Statutory Instruments 2023 No. 96 The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023

¹² Ministry of Housing, Communities & Local Government (2023) National Planning Policy Framework, HMSO London

¹³ Ministry for Housing, Communities and Local Government (2019) Planning Practice Guidance Air Quality

¹⁴ Kirklees Council (2019) Kirklees Local Plan Strategy and Policies

Air Quality Assessment Guidance

2.3 The following guidance was utilised in the air quality assessment:

- Defra, Local Air Quality Management Technical Guidance (LAQM.TG(22)) (2022)¹⁵;
- Institute of Air Quality Management, Guidance on the Assessment of Dust from Demolition and Construction (2024)¹⁶;
- Institute of Air Quality Management and Environmental Protection UK, Land-Use Planning and Development Control: Planning for Air Quality (2017)¹⁷; and
- West Yorkshire Low Emissions Strategy, Air Quality & Emissions Technical Planning Guidance (2016)¹⁸.

¹⁵ Defra (2022) Local Air Quality Management Technical Guidance LAQM.TG(22)

¹⁶ Institute of Air Quality Management (2024) Guidance on the Assessment of Dust from Demolition and Construction, Institute of Air Quality Management, London

¹⁷ Institute of Air Quality Management and Environmental Protection UK (2017) Land-Use Planning and Development Control: Planning for Air Quality

¹⁸ West Yorkshire Low Emissions Strategy (2016) Air Quality & Emissions Technical Planning Guidance

3. METHODOLOGY

Consultation with Kirklees Council

- 3.1 Consultation was undertaken with the Environmental Health Team at KC in which the proposed methodology was provided via email on the 9th July 2024. KC responded via email on the 9th July 2024 accepting the proposed methodology.
- 3.2 The scope of works, as agreed with KC, are detailed below:
- Construction Phase - A construction phase dust assessment was undertaken and relevant measures to mitigate construction phase dust emissions were recommended. The assessment was undertaken in accordance with guidance provided by the Institute of Air Quality Management (IAQM)¹⁶.
 - Operational Phase – An operational phase road traffic screening assessment was undertaken in accordance with the IAQM and the Environmental Protection UK (EPUK) guidance¹⁷. Furthermore, it was proposed that a qualitative exposure assessment to determine the suitability of the Site for the proposed educational use was also undertaken.
 - The WYLES Air Quality and Emissions Technical Planning Guidance¹⁸ was also considered as part of the assessment. The proposed development was classified as 'Medium'. Type 1 and 2 mitigation were therefore considered following the WYLES Technical Planning Guidance¹⁸. An exposure assessment was required as part of the WYLES Air Quality and Emissions Technical Planning Guidance¹⁸. As stated above, an exposure assessment was undertaken to determine the suitability of the Site.
- 3.3 Full details of the methodology used in the assessment, as agreed with KC, are provided below.

Construction Phase Dust Assessment

- 3.4 An assessment of the potential impacts arising from the construction of the proposed development was undertaken in accordance with IAQM guidance¹⁶. The full assessment methodology is not reproduced within this report but a summary of the assessment steps are provided below:
- Step 1 – screen the requirement for a more detailed assessment. No assessment is required if there are no receptors within a certain distance of the works.
 - Step 2 – assess the risk of dust impacts separately for each of the four activities considered (demolition, earthworks, construction and trackout).
 - Step 2A – determine the potential dust emission magnitude for each of the four activities;
 - Step 2B – determine the sensitivity of the area;
 - Step 2C – determine the risk of dust impacts by combining the findings of steps 2A and 2B.
 - Step 3 – determine the site-specific mitigation for each of the four activities; and
 - Step 4 – examine the residual effects and determine significance.

Operational Phase Road Traffic Emissions – Screening Assessment

West Yorkshire Low Emissions Strategy Technical Guidance

- 3.5 KC has adopted the WYLES Air Quality and Emissions Technical Planning Guidance¹⁸ and therefore the development classification process detailed in the guidance¹⁸ was undertaken and mitigation measures recommended accordingly.
- 3.6 The WYLES Air Quality and Emissions Technical Planning Guidance¹⁸ provides a three step assessment process as follows:
- Step 1 – Development Type Classification;
 - Step 2 – Air Quality Impact Assessment; and
 - Step 3 – Mitigation
- 3.7 This three step process was undertaken.

IAQM/EPUK Guidance

- 3.8 Guidance published by the IAQM and EPUK in 2017¹⁷ provides a two-stage approach to determine the level of assessment required in the consideration of the impact of development-generated road traffic emissions on local air quality.

Stage 1

- 3.9 The Stage 1 criteria requires that the assessment progress to Stage 2 if any of the following apply:
- The development comprises:
 - 10 or more residential units or a site area of more than 0.5ha; or
 - More than 1,000m² of floor space for all other uses or a site area greater than 1ha;
 - Coupled with any of the following:
 - The development has more than 10 parking spaces; or
 - The development will have a centralised energy facility or other centralised combustion process.

Stage 2

- 3.10 The IAQM and EPUK guidance¹⁷ provides the following indicative criteria to determine whether a detailed road traffic emissions assessment is required for a proposed development.
- 3.11 The Stage 2 criteria relevant to the proposed development are:
- A change in Light Duty Vehicles (LDV) flow of more than 500 vehicles as a 24 hour Annual Average Daily Traffic (AADT) flow not within an AQMA; and

- A change in Heavy Duty Vehicle (HDV) flow of more than 100 vehicles as a 24 hour AADT flow not within an AQMA.

Site Suitability Assessment

- 3.12 Monitored concentrations undertaken by KC were compared to the relevant air quality objectives⁷. The current relevant air quality standards and objectives are detailed in **Table 3.1**.

Table 3.1: Air Quality Standards and Objectives (England)

Pollutant	Averaging Period	Air Quality Objective ($\mu\text{g.m}^{-3}$)	Date to Achieve by
NO ₂	Annual Mean	40	31 December 2005
	1-hour mean not to be exceeded more than 18 times per year	200	31 December 2005
PM ₁₀	Annual Mean	40	31 December 2004
	24-hour mean not to be exceeded more than 35 times per year	50	31 December 2004
PM _{2.5}	Annual Mean	20	1 January 2020
	<i>Annual mean interim target as detailed within the Environmental Improvement Plan¹⁹</i>	12	<i>31 January 2028</i>
	<i>Annual mean</i>	<i>10</i>	<i>31 December 2040</i>

Italics notes future objective

¹⁹ Defra (2023) Environmental Improvement Plan 2023, First revision of the 25 Year Environment Plan

4. CONSTRUCTION PHASE DUST ASSESSMENT

- 4.1 The construction phase of the proposed development will involve a number of activities which have the potential to impact on local air quality.
- 4.2 The location of sensitive receptors in relation to construction activities will affect the potential for such construction activities to cause dust soiling, nuisance and local air quality impacts. Meteorological conditions and the use of control measures will also contribute to the effects experienced.

Step 1: Screen the Need for a Detailed Assessment

- 4.3 Step 1 of the IAQM guidance¹⁶ involves a screening assessment to consider whether a more detailed construction phase dust assessment is required.
- 4.4 In accordance with the guidance, a detailed assessment is required if:
- Human receptors are located within 250m of the boundary of the Site or 50m of routes used by construction vehicles on the public highways, up to 250m from the Site entrances; or
 - Ecological receptors are located within 50m of the boundary of the Site or 50m of routes used by construction vehicles on the public highways, up to 250m from the Site entrances.
- 4.5 From a review of the Multi Agency Geographic Information for the Countryside (MAGIC) website²⁰, no ecological designations were identified within the above screening distance and therefore the impact on ecological designations was not considered further. However human receptors are located within the above screening distances, with the closest of these receptors located off Fernside Avenue. A construction phase assessment was therefore undertaken.

Step 2: Assess the Risk of Dust Impacts

Step 2A: Define the Potential Dust Emission Magnitude

- 4.6 The dust emission magnitudes for the construction activities were defined using the criteria detailed in the IAQM guidance¹⁶ as detailed in **Table 4.1**. Demolition and earthworks activities are covered under a separate application and were therefore excluded from this assessment.

Table 4.1: Dust Emission Magnitude Criteria and Definition

Activity	IAQM Dust Emission Magnitude	IAQM Dust Emission Magnitude Criteria
Construction	Large	Total building volume >75,000m ³ , on site concrete batching, sandblasting.

²⁰ Defra, Multi Agency Geographic Information for the Countryside (MAGIC) [<http://magic.defra.gov.uk/>]

Activity	IAQM Dust Emission Magnitude	IAQM Dust Emission Magnitude Criteria
	Medium	Total building volume 12,000m ³ – 75,000m ³ , potentially dusty construction material (e.g. concrete), on site concrete batching.
	Small	Total building volume <12,000m ³ , construction material with low potential for dust release (e.g. metal cladding or timber).
Trackout	Large	>50 HDV (>3.5t) outward movements in any one day, potentially dusty surface material (e.g. high clay content), unpaved road length >100m.
	Medium	20 - 50 HDV (>3.5t) outward movements in any one day, moderately dusty surface material (e.g. high clay content), unpaved road length 50m – 100m.
	Small	<20 HDV (>3.5t) outward movements in any one day, surface material with low potential for dust release, unpaved road length <50m.

4.7 The following dust emission magnitudes were defined for the proposed development:

- Construction – The proposed development will require construction of school buildings up to approximately 9m high, which include potentially dusty materials such as brick. The building volume is between 12,000m³ and 75,000m³. Therefore, the dust emission magnitude for construction was defined as **Medium**.
- Trackout – Due to the size of the proposed development, it is possible that there will be between 20 and 50 outward HDV movements in any one day. The dust emission magnitude for trackout was therefore defined as **Medium**. The trackout distance utilised in the assessment was set to 250m from the Site access in accordance with the guidance¹⁶.

4.8 A summary of the defined dust emission magnitudes for the development are provided in **Table 4.2**.

Table 4.2: Summary of Project Defined Dust Emission Magnitudes

Activity	Dust Emission Magnitude
Construction	Medium
Trackout	Medium

Step 2B: Define the Sensitivity of the Area

4.9 The assessment requires the determination of the sensitivity of the area for the purposes of dust soiling and human health impacts. The sensitivity of the study area takes into account the specific receptors in the vicinity of the Site, the proximity and number of those receptors, the local background concentration of PM₁₀ and site-specific factors. **Figure 4.1** was utilised to determine the number of receptors located within the distance bands provided in the IAQM guidance¹⁶ for determining receptor sensitivity.

4.10 The sensitivity of the area is defined below, in accordance with IAQM criteria¹⁶ and summarised in **Table 4.3**.

- Dust Soiling – There are between 10 and 100 highly sensitive residential receptors and one educational facility, located within 20m of the proposed Site boundary and the

assumed construction vehicle exit routes, totalling more than 100 highly sensitive receptors from both the proposed Site boundary and the trackout route. The sensitivity of the area to dust soiling impacts was therefore defined as **High**.

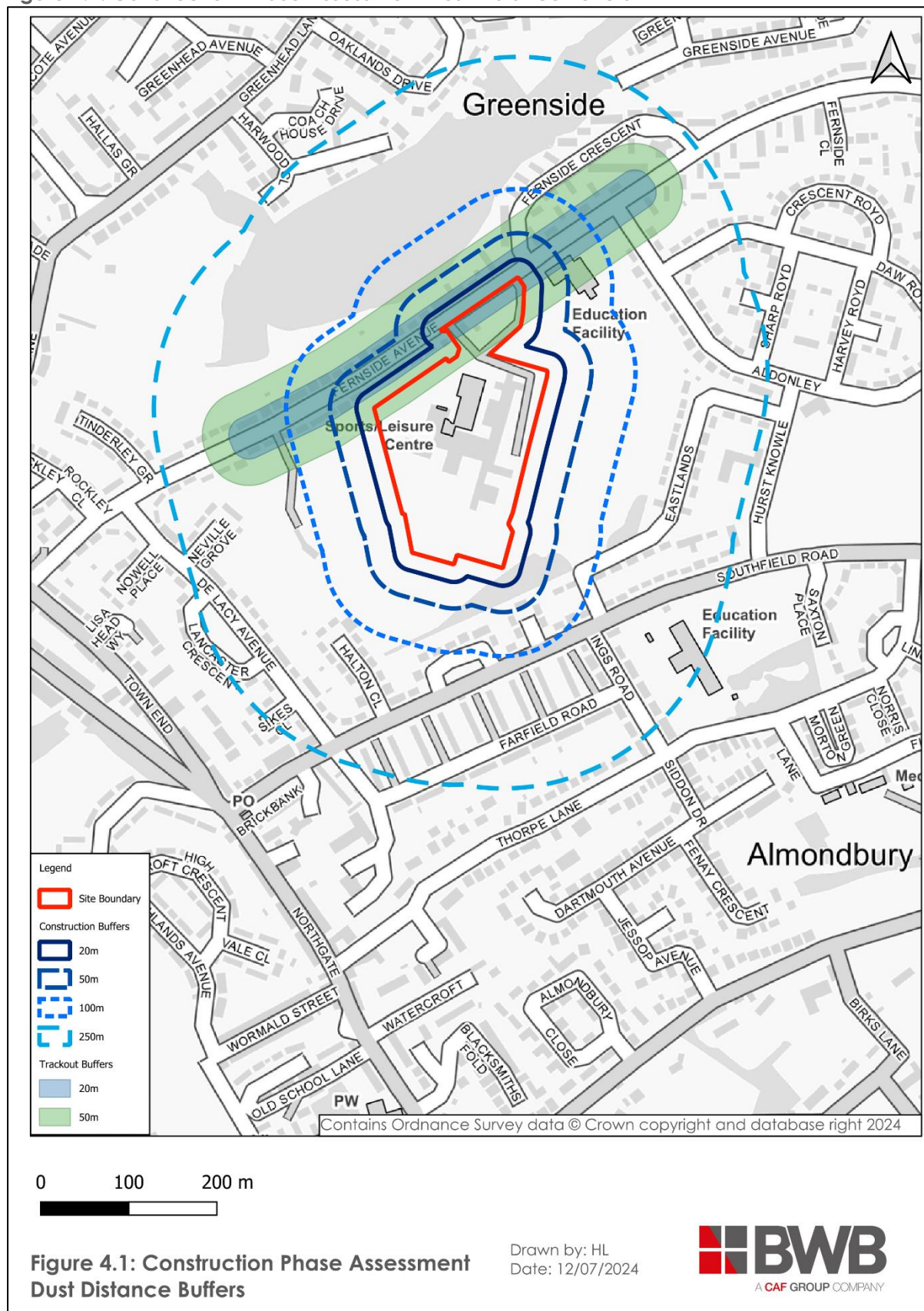
- Human Health – There are between 10 and 100 highly sensitive residential receptors and one educational facility located within 20m of the proposed Site boundary and assumed construction vehicle exit routes, totalling more than 100 highly sensitive receptors from both the proposed Site boundary and the trackout route. In accordance with Defra background mapping²¹, the background PM₁₀ concentration is below 24µg.m⁻³. The sensitivity of the area to human health impacts was therefore defined as **Medium**

Table 4.3: Determination of the Sensitivity of the Area

Potential Impact	Sensitivity	
	Construction	Trackout
Dust Soiling	High	High
Human Health	Medium	Medium

²¹ <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018>

Figure 4.1: Construction Phase Assessment Dust Distance Buffers



Step 2C: Define the Risk of Impacts

- 4.11** The dust emission magnitude determined in Step 2A is then combined with the sensitivity of the area determined in Step 2B to define the risk of dust impacts with no mitigation applied. The results of this assessment are detailed in **Table 4.4**.

Table 4.4: Summary Dust Risk Table to Define Site Specific Risk

Activity	Step 2A: Dust Emission Magnitude	Step 2B: Sensitivity of the Area	Step 2C: Risk of Dust Impacts
<i>Dust Soiling Effects on People and Property</i>			
Construction	Medium	High	Medium Risk
Trackout	Medium	High	Medium Risk
<i>Human Health Impacts</i>			
Construction	Medium	Medium	Medium Risk
Trackout	Medium	Medium	Medium Risk

Step 3: Site-Specific Mitigation

- 4.12** The risk of dust impacts, defined in Step 2C of the assessment, is used to determine the mitigation measures required to minimise the emission of dust during construction phase activities. The IAQM guidance¹⁶ provides details of highly recommended and desirable mitigation measures which are commensurate with the risk of dust impacts defined in Step 2C for earthworks and trackout activities. Where the mitigation measures are general in nature, the highest risk category was applied in accordance with the guidance¹⁶. The highest risk category identified was 'Medium Risk' and the recommended mitigation taken from the IAQM guidance¹⁶ is detailed in **Table 4.5** and **Table 4.6**.

Table 4.5: Mitigation Measures for a Medium Risk Site

Category	Mitigation Measures for a Medium Risk Site	
	Highly Recommended	Desirable
Communication	Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.	None
	Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environmental manager/engineer or the site manager.	
	Display the head or regional office contact information.	

Category	Mitigation Measures for a Medium Risk Site	
	Highly Recommended	Desirable
	Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority.	
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.	None
	Make the complaints log available to the local authority when asked.	
	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 inspections results, and make an inspection log available to the local authority when asked.	Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100m of the site boundary, with cleaning to be provided as necessary.
	Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.	
Preparing and maintaining the site	Plan the site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.	None
	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 site or specific operations where there is a high potential for dust production and the site is active for an extended 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 on site. If they are being re-used on-site cover as described below.	
	Cover, seed or fence stockpiles to prevent wind whipping.	

Category	Mitigation Measures for a Medium Risk Site	
	Highly Recommended	Desirable
Operating vehicle/ machinery and sustainable travel	Ensure all vehicles switch off engines when stationary – no idling vehicles.	Impose and signpost a maximum-speed-limit of 15 mph on surfaced and 10 mph on un-surfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).
	Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable.	Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).
	Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.	
Operations	Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.	None
	Ensure an adequate water supply on site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate.	
	Use enclosed chutes and conveyors and covered skips.	
	Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.	
	Ensure equipment is readily available on site to clean and dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.	
Waste Management	Avoid bonfires and burning of waste materials.	None

Table 4.6: Mitigation Measures Specific to Construction and Trackout

Category	Mitigation Measures	
	Highly Recommended	Desirable
Construction (Medium Risk Site)	Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure	Avoid scabbling (roughening of concrete surfaces) if possible.
		Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems

Category	Mitigation Measures	
	Highly Recommended	Desirable
	that appropriate additional control measures are in place.	to prevent escape of material and overfilling during delivery. For smaller supplies of fine power materials ensure bags are sealed after use and stored appropriately to prevent dust.
Trackout (Medium Risk Site)	Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any materials tracked out of the site. This may require the sweeper being continuously in use.	None
	Avoid dry sweeping of large areas.	
	Ensure vehicles entering and leaving the sites are covered to prevent escape of materials during transport.	
	Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.	
	Record all inspections of haul routes and any subsequent action in a site log book.	
	Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.	
	Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).	
	Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.	
	Access gates to be located at least 10m from receptors where possible.	

Step 4: Determine Significant Effects

- 4.13 In accordance with IAQM guidance¹⁶, with the implementation of the mitigation measures detailed in Step 3, the residual impacts from the construction phase are considered to be 'not significant'.

5. OPERATIONAL PHASE ROAD TRAFFIC EMISSIONS SCREENING ASSESSMENT

- 5.1 Consideration was given to both the potential impacts associated with additional development-generated vehicles on local air quality and the suitability of the Site for the proposed sensitive use with regard to the current relevant air quality objectives for England.

West Yorkshire Low Emissions Strategy Air Quality & Emissions Technical Planning Guidance

- 5.2 KC has adopted the WYLES Air Quality and Emissions Technical Planning Guidance¹⁸. The three-step process detailed in the guidance¹⁸ was therefore undertaken.

Step 1: Development Classification

- 5.3 The proposed development is for non-residential educational use with more than 1,000m² of floor space proposed. Therefore, the development meets the criteria set out in the guidance¹⁸ for a 'Medium' development and does not meet any additional criteria for a 'Major' development. The development was therefore classified as 'Medium'.

Step 2: Air Quality Impact Assessment

- 5.4 In accordance with the guidance¹⁸, where a development is classified as 'Minor' or 'Medium' and the proposed land use type is D1 'Non-Residential Institutions', as determined by Table 1 of the guidance¹⁸, an exposure assessment is required to assess the suitability of the Site for the proposed educational end use.
- 5.5 The Site is not located close to any major road sources and monitoring data in the area is below the current air quality objectives for England, as detailed in **Table 5.1**. A qualitative air quality assessment was undertaken following the WYLES Air Quality and Emissions Technical Planning Guidance¹⁸.

Impact Screening Assessment

- 5.6 The trip generation for the proposed development was screened using IAQM and EPUK Stage 1 and Stage 2 criteria¹⁷ to determine whether a detailed air quality assessment was required.

Stage 1

- 5.7 The proposed development comprises more than 1,000m² of floor space and proposes more than 10 parking spaces; it was therefore necessary to proceed to Stage 2.

Stage 2

- 5.8 The trip generation for the proposed development was provided by BWB Consulting, the Transport Consultants for the project.
- 5.9 The predicted trip generation for the proposed development is 406 two-way LDVs, of which 92 are educational minibus movements. Additionally, no HDVs are predicted as a result of the proposed development. The predicted trip generation is below the IAQM and EPUK guidance¹⁷ screening criteria of 500 LDVs and 100 HDVs for developments outside of an AQMA, as a 24-hour AADT flow. Therefore, the impact on local air quality from additional trips associated with the proposed development is predicted to be not significant in accordance with IAQM and EPUK guidance¹⁷ and no detailed assessment is required.

Qualitative Exposure Assessment

- 5.10 A qualitative assessment was undertaken to consider the potential exposure of the future users of the proposed development to elevated air pollutant concentrations. This was undertaken through a review of local air quality monitoring data and a review of local emission sources.

Nitrogen Dioxide

- 5.11 KC undertakes NO₂ monitoring using a network of automatic and diffusion tube monitors. The closest monitoring location to the Site is K52 which is located approximately 790m northeast of the proposed Site boundary, off the A629 Penistone Road. No automatic monitoring stations are located within the vicinity of the Site.
- 5.12 Bias adjusted NO₂ monitoring results for K52 are detailed in **Table 5.1**. At the time of assessment 2020 and 2021 monitoring data were available and therefore were included in the review. The IAQM released a position statement²² in August 2021 with regard to 2020 and 2021 monitoring datasets. Due to the influence of the COVID-19 pandemic lockdown restrictions, 2020 and 2021 monitoring data are not considered representative of normal conditions. 2022 data were available and included in the review. As the IAQM has not released a position statement in relation to 2022 monitoring data, 2022 was considered representative of normal conditions.

Table 5.1: KC NO₂ Monitoring Data in 2016 – 2022

ID	Grid Reference (X,Y)	Site Type	Distance from and direction from Site boundary	Monitored Annual Average Concentration (µg.m ⁻³)						
				2016	2017	2018	2019	2020	2021	2022
K52	417627, 416472	Roadside	790m northeast	36.5	34.6	34.2	30.7	20.9	27.4	28.1

²² Institute of Air Quality Management (2021) Position Statement: Use of 2020 and 2021 Monitoring Datasets

- 5.13 Monitored annual mean NO₂ concentrations were below the annual mean objective at monitoring location K52 between 2016 and 2022. An overall decreasing trend was identified between 2016 and 2022. It should be noted that there is a significant decrease in recorded NO₂ concentration in 2020, followed by an increase in 2021 and 2022. This is likely due to the influence of the COVID-19 lockdown restrictions, as stated within the IAQM position statement²².
- 5.14 K52 is located along the A269 Penistone Road, approximately 2.4m from the nearest kerb. The monitoring location is situated near a traffic lighted junction, where queuing traffic is expected. The Site entrance is not situated near a major junction and areas of the proposed development where sensitive uses are proposed are located approximately 75m from the nearest kerb. Therefore, as the monitored concentration at K52 is below the current annual mean objective, it is expected that concentrations on Site will also be below the current annual mean objective.
- 5.15 Furthermore, as provided by the Department for Transport website²³, the AADT for the A629 Penistone Road was estimated at 21,948 in 2023. This is significantly higher than the estimated flows along Fernside Avenue provided by the Transport Consultants, with just 1,904 AADT. Therefore, as NO₂ concentrations along the A629 Penistone Road are below the current relevant objective, it is likely that the Site will also be below the current relevant objective.

Particulate Matter (PM₁₀ and PM_{2.5})

- 5.16 No PM₁₀ or PM_{2.5} monitoring is undertaken by KC within the vicinity of the Site. A review of Defra background mapping data²⁴ shows that 2024 background PM₁₀ and PM_{2.5} concentrations are below the current relevant air quality objectives. Additionally, PM_{2.5} concentrations are below the annual mean interim target of 12µg.m⁻³ and the future annual mean objective of 10 µg.m⁻³.
- 5.17 Based on the above, the Site was considered to be suitable for the proposed end use with regard to the current relevant air quality objectives for England. Additionally, the proposed development will be replacing the existing Almondbury Community School, therefore no change of use is proposed within the development Site, therefore future receptors are likely to experience the air quality concentrations similar to existing receptors.

²³ <https://roadtraffic.dft.gov.uk/#16/53.6347/-1.7393/basemap-countpoints>

²⁴ <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018>

Mitigation

West Yorkshire Low Emissions Strategy Air Quality & Emissions Technical Planning Guidance

Stage 3: Mitigation

- 5.18 The proposed development is classified as 'Medium', therefore Type 1 and 2 mitigation is required in accordance with the WYLES Air Quality and Emissions Technical Planning Guidance¹⁸ to minimise the impact of the proposed development on local air quality.
- 5.19 Type 1 mitigation required as part of the WYLES Air Quality and Emissions Technical Planning Guidance¹⁸ requires that 10% of parking spaces are to be Electric Vehicle (EV) charging spaces which may be phased with 5% initial provision and the remainder at an agreed trigger level. EV parking will be included in the proposed development and meets the initial 5% provision required.
- 5.20** Type 2 mitigation measures included within the proposed development include a Travel Plan. Given the nature of the development, a Travel Plan is not considered necessary. It was agreed during scoping with KC that a Travel Plan is not required.

6. CONCLUSION

- 6.1 A qualitative air quality screening assessment was undertaken for the proposed SEND School at land to the south-east of Fernside Avenue, in the Almondbury district of Huddersfield.
- 6.2 A qualitative construction phase assessment was undertaken and measures were recommended to minimise emissions during construction activities. With the implementation of these mitigation measures the impact of construction phase dust emissions is considered to be 'not significant' in accordance with IAQM guidance¹⁶.
- 6.3 The predicted trip generation for the proposed development was screened using the IAQM and EPUK¹⁷ two stage screening process. The predicted trip generation was below the relevant screening criteria for development outside an AQMA. Air quality impacts as a result of additional road traffic emissions associated with the Site were therefore considered to be 'not significant' in accordance with the guidance¹⁷ and a detailed impact assessment was not undertaken.
- 6.4 Consideration was given to the WYLES Air Quality and Emissions Technical Planning Guidance¹⁸ and the development was categorised as a 'Medium' development. Therefore, an exposure assessment was required but an air quality impact assessment was not required. A qualitative Site suitability assessment was carried out and local air quality monitoring data was reviewed. Monitoring data in the vicinity of the Site recorded concentrations below the current relevant air quality objectives for England. In addition, the Site is located away from any major road pollutant sources, therefore it can be considered that pollutant concentrations at the Site are likely to also be below the current relevant air quality objectives for England. The proposed development was therefore considered to be suitable for the proposed sensitive use with regard to the current relevant air quality objectives for England.
- 6.5 For 'Medium' developments, Type 1 and Type 2 mitigation measures are required, in accordance with the WYLES Air Quality and Emissions Technical Planning Guidance¹⁸. The proposed development includes EV vehicle charging points, which adhere to the requirements of Type 1 mitigation measures in the WYLES Air Quality and Emissions Technical Planning Guidance¹⁸.

APPENDICES

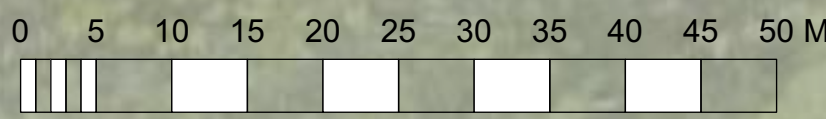
APPENDIX A: GLOSSARY OF TERMS

	Definition
AADT	Annual Average Daily Traffic flow.
Air quality objective	Policy target generally expressed as a maximum ambient concentration to be achieved, either without exception or with a permitted number of exceedances within a specific timescale (see also air quality standard).
Air quality standard	The concentrations of pollutants in the atmosphere which can broadly be taken to achieve a certain level of environmental quality. The standards are based on the assessment of the effects of each pollutant on human health including the effects on sensitive sub groups (see also air quality objective).
Annual mean	The average (mean) of the concentrations measured for each pollutant for one year. Usually this is for a calendar year, but some species are reported for the period April to March, known as a pollution year. This period avoids splitting winter season between two years, which is useful for pollutants that have higher concentrations during the winter months.
AQAP	Air Quality Action Plan.
AQMA	Air Quality Management Area.
AQS	Air Quality Strategy.
Defra	Department for Environment, Food and Rural Affairs.
EPUK	Environmental Protection UK.
Exceedance	A period of time where the concentrations of a pollutant is greater than, or equal to, the appropriate air quality standard.
HDV	Heavy Duty Vehicles (HGVs + buses and coaches)
HGV	Heavy Goods Vehicles.
IAQM	Institute of Air Quality Management.
LAQM	Local Air Quality Management.
LDV	Light Duty Vehicles (motorbikes, cars, vans and small trucks)
NO	Nitrogen monoxide, a.k.a. nitric oxide.
NO ₂	Nitrogen dioxide.
NO _x	Nitrogen oxides.
Percentile	The percentage of results below a given value.
PM ₁₀	Particulate matter with an aerodynamic diameter of less than 10 micrometres.
PM _{2.5}	Particulate matter with an aerodynamic diameter of less than 2.5 micrometres.
micrograms per cubic metre (µg.m ⁻³)	A measure of concentration in terms of mass per unit volume. A concentration of 1µg.m ⁻³ means that one cubic metre of air contains one microgram (millionth of a gram) of pollutant.

APPENDIX B: PROPOSED DEVELOPMENT MASTERPLAN



Fernside Avenue



KEY CONTINUED

- (A) Main Visitor Entrance**
Direct pedestrian route through visitor car park to main reception.
- (B) Visitor Car Park (Total Bays: 30 Bays)**
 - 24no. Car Parking Bays
 - 3no. Accessible Parking Bays (Including 1 EV Charging Point)
 - 3no. EV Parking Bays
- (C) Staff Garden**
Staff breakout space incorporating seating / tables and planting to buffer the car park.
- (D) Staff Car Park (Total Bays: 120 excluding mini bus bays)**
 - 111 Standard Parking Bays
 - 2no. Mini Bus Parking Bays
 - 3no. Accessible Parking Bays
 - 6no. Standard EV Bays
- (E) Student Drop-Off / External Play**
Informal drop-off loop for 30no. vehicles, designed to be utilised as soft and hard external play when not in use as a drop-off space. This is secured via fence and gates from the staff car park and gives direct access into the courtyard.
- (F) 6no. Existing MUGA Courts**
Courts to be retained and resurfaced as required.
1no. Court to be used for fixed play equipment.
- (G) Proposed Woodland Buffer Planting**
Woodland whip buffer planting to be planted around the outside of the school boundary to mitigate overlooking.
- (H) Forest School**
Fenced off forest school play space set across the western side of the site incorporating the existing slopes as well as flat plateaus and winding footpath routes.
- (I) Fixed Play Equipment including Swings**
- (J) KS1 / 2 External Play Space**
Fenced hard play associated with each classroom.
- (K) Bin store (Location TBC)**
Capacity for 8no. eurobins (as per existing number)
- (L) External Courtyard**
- (M) KS3 / 4 External Play Space**
Fenced hard play associated with each classroom.
- (N) Forest Hub**
Existing Forest School classroom relocated. Horticultural garden including raised beds and greenhouse adjacent.
- (O) Chickens**
Secure fenced area.
- (P) Seating Terraces**
Terraced seating making key level changes usable.
- (Q) Potential Substation Location**
- (R) Existing Main Entrance**
Entrance road widened with new gates and fenceline as required.
- (S) Proposed Main Entrance**
Gates and secondary secure line.
- (T) Fire Pit**
- (U) Water Feature**
- (V) 10no. Covered Cycle Spaces**
- (W) Sports Equipment Storage**
- (X) Existing Pre-School Demolished and replaced with grass. Existing parking retained.**
- (Y) Covered outdoor dining area**
- (Z) Covered seating area**
- (AA) Signage Board**
- (BB) Area identified as potential petting zoo location**
- (CC) Post 16 External garden space**
- (DD) Swale**
Refer to drainage plan by others for details.
- (EE) Existing playing field retained**

Note

1. Do not scale from this drawing
2. To be read in conjunction with Project Risk Register REF: XXX
3. To be read in conjunction with all other Landscape Architect's drawings

KEY

Site Planning Boundary

RESIDUAL PROJECT RISKS

REVISIONS

STATUS
S2 - For Planning

ares
LANDSCAPE ARCHITECTS

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Galecrasher,
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e: hello@aresdesign.co.uk
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CLIENT:
Kirklees Council

PROJECT TITLE:
Woodley School and College

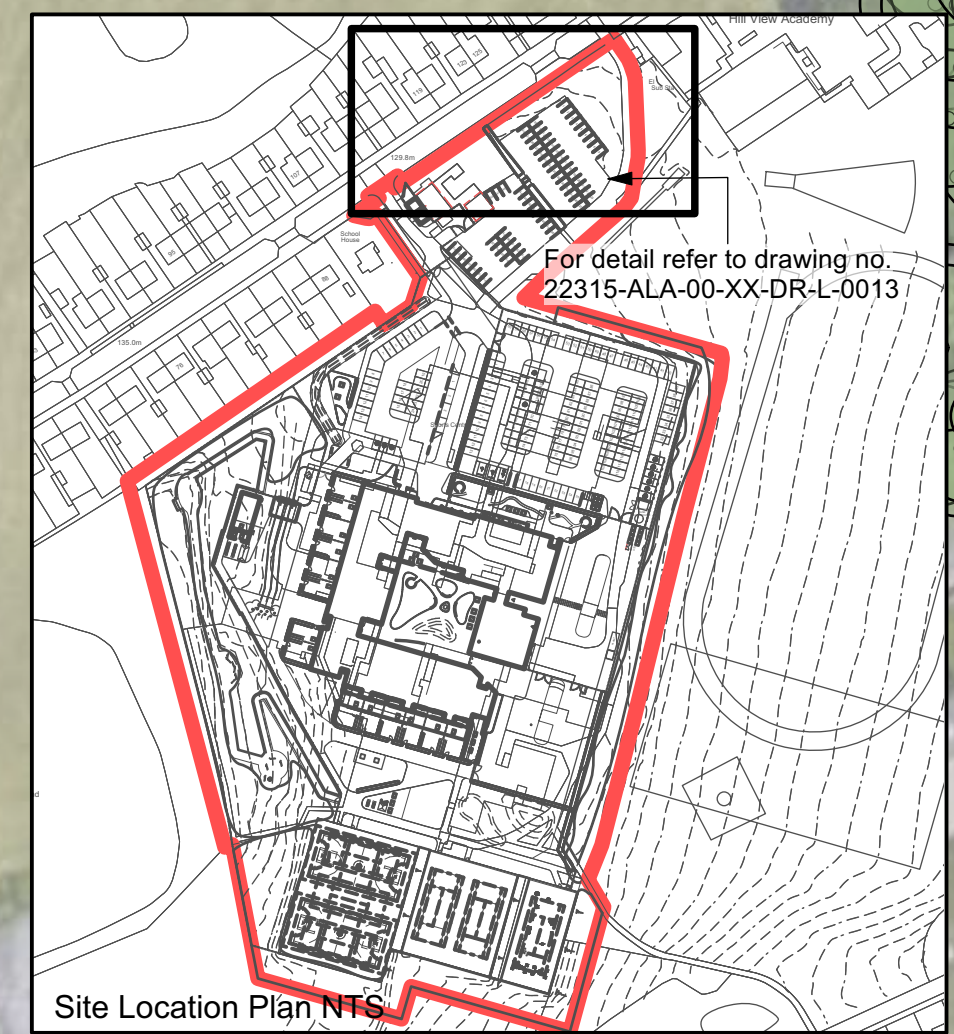
DRAWING TITLE:
Landscape Illustrative Masterplan

DRAWING SCALE: 1:500
PAPER SIZE: A1

DRAWN BY: AT
APPROVED BY: RS

DRAWN DATE: 19/01/2023
ALA PROJECT CODE: ALA 823

DRAWING NUMBER: 22315-ALA-00-XX-DR-L-0001
STATUS: S2
REVISION: P04



APPENDIX C: PLANNING POLICY AND LEGISLATION

National Legislation and Planning Policy

The UK Air Quality Strategy

- C.1 European Union (EU) legislation forms the basis of air quality policy and legislation in the UK. The EU 2008 ambient Air Quality Directive¹ sets limits for ambient concentrations of air pollutants including nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}). The air quality standards and objectives are prescribed through the Air Quality (England) Regulations 2000², as amended, for the purpose of the Local Air Quality Management Framework. The Air Quality (England) Regulations were amended in 2002⁵ and again in 2010⁶, with miscellaneous amendments added in 2020¹⁰ following the UK exit from the EU. Additionally, an updated PM_{2.5} objective was published in 2023⁹ with an interim target to be achieved by 2028¹⁹.
- C.2 The UK Government are required under the Environment Act 1995³ to produce a national Air Quality Strategy (AQS). The AQS was first published in 1997⁷ and was most recently reviewed and updated in 2007⁸ and most recently reviewed and updated in 2023⁹. The AQS provides an overview of the Government's ambient air quality policy and sets out the air quality standards and objectives to be achieved and measures to improve air quality.
- C.3 The Environment Act 2021⁴ was granted Royal Assent in November 2021 and contains amendments to Part IV of the Environment Act 1995³ with regard to the Local Air Quality Management regime. Under the Environment Act 2021⁴, the Secretary of State must lay a statement before Parliament setting out progress made in meeting air quality objectives and standard in England and steps taken towards achieving the standards. The Environment Act 2021⁴ also places responsibility on local authorities to co-operate with air quality partners in the preparation of Air Quality Action Plans and identification of measures which should be monitored within the Plan and dates by which they should be implemented.
- C.4 Part IV of the Environment Act³ requires local authorities in the UK to review local air quality within their administrative area and, if relevant air quality standards and objectives are likely to be exceeded, designate Air Quality Management Areas (AQMA). Following the designation of an AQMA, local authorities are required to publish an Air Quality Action Plan (AQAP) detailing measures to be taken to improve local air quality and work towards meeting the relevant air quality standards and objectives.

National Planning Policy Framework

- C.5 The National Planning Policy Framework (NPPF)¹² was amended in December 2023 and sets out the Government's planning policies for England and how these are expected to be applied.
- C.6 The NPPF¹² recognises air quality within Section 15: Conserving and enhancing the natural environment, and 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 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, taking into account relevant information such as river basin management plans;

[...]

Ground conditions and pollution

[...]

Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

[...]

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."

C.7 With regard to assessing cumulative effects the NPPF¹² states:

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

[...]"

Planning Practice Guidance

C.8 The Planning Practice Guidance (PPG) for air quality¹³ was updated in November 2019 and provides guiding principles on how the planning process can take account of the impacts of new development on air quality.

C.9 The PPG¹³ sets out the following with regard to air quality and planning:

- *"What air quality considerations does planning need to address;*
- *What is the role of plan-making with regard to air quality;*
- *Air quality concerns relevant to neighbourhood planning;*
- *What information is available about air quality;*
- *When could air quality considerations be relevant to the development management process;*
- *What specific issues may need to be considered when assessing air quality impacts;*
- *How detailed does an air quality assessment need to be; and*
- *How can an impact on air quality be mitigated".*

C.10 The PPG¹³ sets out the pollutants for which there are legally binding limits for concentrations and those which the UK also has national emissions reduction commitments.

C.11 The PPG¹³ states that development plans may need to consider:

- *"what are the observed trends shown by recent air quality monitoring data and what would happen to these trends in light of proposed development and / or allocations;*
- *the impact of point sources of air pollution (pollution that originates from one place);*
- *the potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments, including their implications for vehicle emissions;*
- *ways in which new development could be made appropriate in locations where air quality is or is likely to be a concern, and not give rise to unacceptable risks from pollution. This could, for example, entail identifying measures for offsetting the impact on air quality arising from new development including supporting measures in an air quality action plan or low emissions strategy where applicable; and*
- *opportunities to improve air quality or mitigate impacts, such as through traffic and travel management and green infrastructure provision and enhancement".*

C.12 The PPG¹³ also states what may be considered relevant to determining a planning application and these include whether a development would:

- *"Lead to changes (including any potential reductions) in vehicle-related emissions in the immediate vicinity of the proposed development or further afield. This could be through the provision of electric vehicle charging infrastructure; altering the level of traffic congestion; significantly changing traffic volumes, vehicle speeds or both; or significantly altering the traffic composition on local roads. Other matters to consider include whether the proposal involves the development of a bus station, coach or lorry park; could add to turnover in a large car park; or involve construction sites that would generate large Heavy Goods Vehicle flows over a period of a year or more;*

- *Introduce new point sources of air pollution. This could include furnaces which require prior notification to local authorities; biomass boilers or biomass-fuelled Combined Heat and Power plant; centralised boilers or plant burning other fuels within or close to an air quality management area or introduce relevant combustion within a Smoke Control Area; or extraction systems (including chimneys) which require approval or permits under pollution control legislation;*
- *Expose people to harmful concentrations of air pollutants, including dust. This could be by building new homes, schools, workplaces or other development in places with poor air quality;*
- *Give rise to potentially unacceptable impacts (such as dust) during construction for nearby sensitive locations;*
- *Have a potential adverse effect on biodiversity, especially where it would affect sites designated for their biodiversity value”.*

C.13 The PPG¹³ provides guidance regarding what should be included within an air quality assessment. Examples of potential air quality mitigation measures are also provided.

Local Planning Policy

Kirklees Council: Kirklees Local Plan (2019) Kirklees Local Plan Strategy and Policies

C.14 The Kirklees Local Plan¹⁴ Kirklees Local Plan Strategy and Policies is the statutory development plan for the Kirklees Council area. The Plan contains the vision and strategic objectives for the development of Kirklees up to 2031. The Plan contains clear specific policies to guide decisions on planning applications. The following policies are relevant with regard to air quality:

“Policy LP20 – Sustainable travel

The council will support demand management measures which discourage single occupancy car travel within new development and encourage the use of low emission vehicles to improve areas with low levels of air quality. Proposals should include measures to encourage the use of sustainable travel options, including public transport, the promotion of personal journey planning, walking, cycling, car sharing, electronic communication and home working.

[...]

Policy LP47 - Healthy, active and safe lifestyles

The council will, with its partners, create an environment which supports healthy, active and safe communities and reduces inequality.

Healthy, active and safe lifestyles will be enabled by:

[...]

ensuring that the current air quality in the district is monitored and maintained and, where required, appropriate mitigation measures included as part of new development proposals.

[...]

Policy LP51 - Protection and improvement of local air quality

Where the development introduces new receptors into Air Quality Management Areas or Areas of Concern or near other areas of relatively poor air quality, for example near roads or junctions, the development must incorporate sustainable mitigation measures that protect the new receptors from unacceptable levels of air pollution. Where sustainable mitigation measures cannot be introduced which prevent receptors from being exposed to unsafe levels of air pollution, development will not be permitted.

[...]"

- C.15 The above policies were taken into consideration throughout the undertaking of the assessment.
-

