Air Quality Assessment	
Bretton Park, Kirklees	
Job number:	J0997
Document number:	J0997/1/F1
Date:	09 October 2025
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1 Introduction

1.1. Proposed Development

1.1.1 Air Quality Assessments Ltd (AQA) has been commissioned c/o KPP Architects Ltd to undertake an air quality assessment for a proposed office extension to an existing industrial unit off Bretton Park Way in Dewsbury. The application site location is shown in **Figure 1**.

1.2. Scope of Assessment

1.2.1 Kirklees Council has declared nine Air Quality Management Areas (AQMA) for exceedances of the annual mean nitrogen dioxide (NO_2) objective and one AQMA for exceedances of the 24-hour mean fine particulate matter (PM_{10}) objective and traffic from the proposed development may affect some of these areas. The application site is not within any of the AQMAs.

1.2.2 This report describes the existing air quality conditions in proximity to the site and considers the effect of the proposed development on local air quality, and of existing air quality on new receptors at the development. The main air pollutants of concern related to road traffic are nitrogen dioxide (NO_2) and fine particulate matter (PM_{10} and $PM_{2.5}$).

1.2.3 This report uses the methodology in the Air Quality & Emissions Technical Planning Guidance published by the West Yorkshire Low Emissions Group to screen out the requirement for a detailed air quality assessment and to determine the level of air quality mitigation required at the proposed development (West Yorkshire Low Emissions Group, 2018). The report also uses screening thresholds published by Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) in Land-Use Planning & Development Control: Planning for Air Quality (EPUK and IAQM, 2017).

1.2.4 The assessment has been prepared taking into account all relevant local and national guidance and regulations.

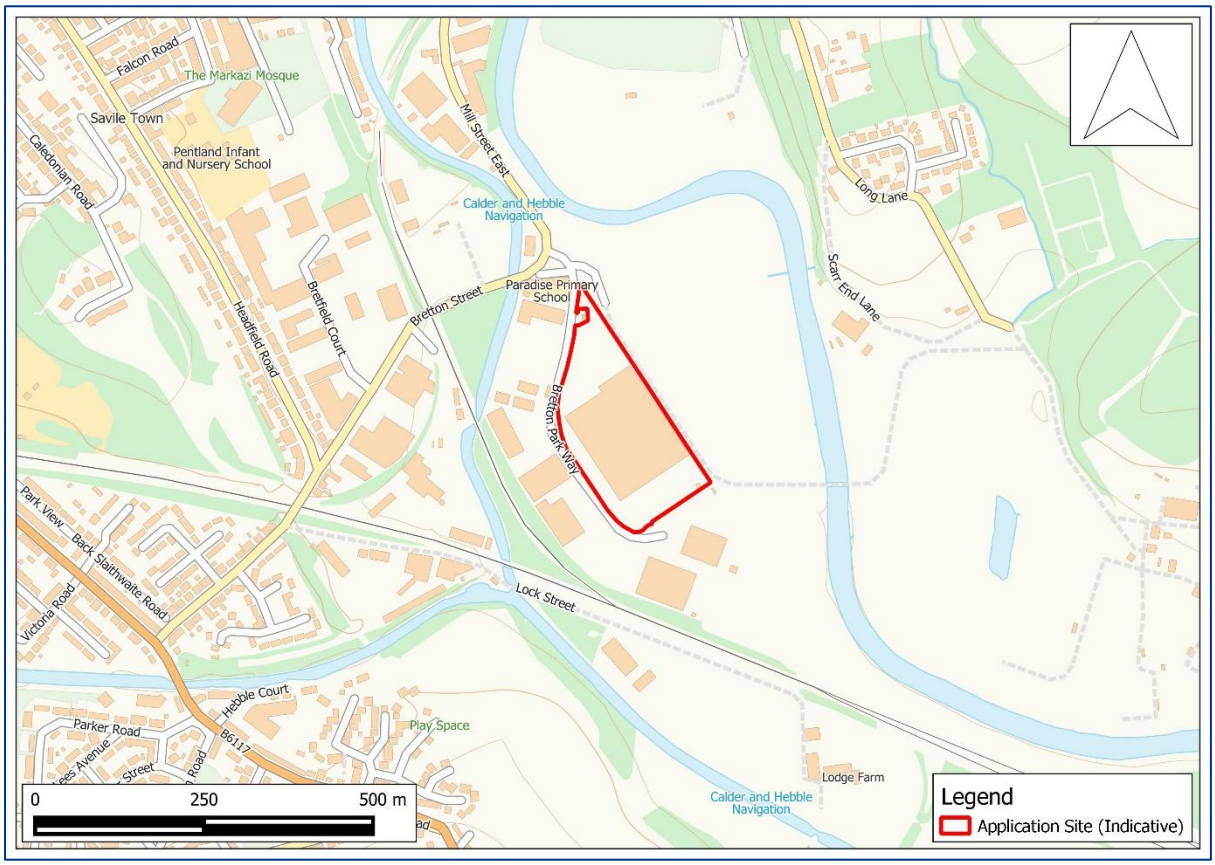

Figure 1: Application Site
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2 Air Quality Legislation and Policy

2.1. Air Quality Legislation

2.1.1 The Air Quality Standards Regulations 2010 (as amended) set legally binding limit values for concentrations of major air pollutants in outdoor air that impact public health, including NO_2, PM_{10} and $PM_{2.5}$ (The Stationary Office, 2010). Limit values apply at all locations, apart from where the public does not have access, where health and safety at work provisions apply and on the road carriageway. The limit values for PM_{10} and NO_2 applied from 2005 and 2010 respectively, whereas the $PM_{2.5}$ limit value applied from 2020.

2.1.2 Part IV of The Environment Act 1995, as amended by the Environment Act 2021, requires the UK Government to prepare a national Air Quality Strategy. A new Air Quality Strategy for England was published in April 2023 (Defra, 2023a). The Air Quality Strategy sets out the actions that Defra expects local authorities to take in support of long-term air quality goals, including new $PM_{2.5}$ targets, and provides a framework to enable local authorities to make the best use of their powers and make improvements for their communities.

2.1.3 The strategy sets out air quality standards and objectives intended to protect human health and the environment. Standards are the concentrations of pollutants in the atmosphere, below which there is a minimum risk of health effects or ecosystem damage; they are set with regard to scientific and medical evidence. Objectives are the policy targets set by the Government, taking account of economic efficiency, practicability, technical feasibility and timescale, where the standards are expected to be achieved by a certain date. The Government has also published a Clean Air Strategy, which provides an overview of the actions that the government will take to improve air quality (Defra, 2019). The actions in the Clean Air Strategy focus on emissions from transport, the home, farming, and industry.

2.1.4 The Air Quality Strategy also describes the system of Local Air Quality Management (LAQM), which was introduced in Part IV of the Environment Act 1995. LAQM requires every local authority to carry out regular review and assessments of air quality in its area. Where an objective has not been, or is unlikely to be achieved, the local authority must declare an Air Quality Management Area (AQMA) and prepare an action plan which sets out appropriate measures to be introduced in pursuit of the objectives. $PM_{2.5}$ is not included in the LAQM framework; however, the government expects all local authorities to effectively use their powers to reduce $PM_{2.5}$ emissions from the sources which are within their control.

2.1.5 The objectives for NO_2 and PM_{10}, as prescribed by the Air Quality (England) Regulations 2000 and the Air Quality (England) (Amendment) Regulations 2002, are shown in **Table 1** (The Stationary Office, 2000; The Stationary Office, 2002). The objectives for NO_2 and PM_{10} are the same as the limit values, but with differing compliance dates. The objectives for PM_{10} and NO_2 were to have been achieved by 2004 and 2005 respectively and continue to apply in all future years thereafter.

2.1.6 The air quality limit value for $PM_{2.5}$ is also shown in **Table 1**. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 set out two legally

binding targets for $PM_{2.5}$, with interim targets for each set out in the Environmental Improvement Plan 2023 (The Stationery Office, 2023; Defra, 2023b). The $PM_{2.5}$ targets are:

- 10µg/m^3 annual mean concentration $PM_{2.5}$ nationwide by 2040, with an interim target of 12µg/m^3 by January 2028; and
- 35% reduction in average population exposure by 2040, with an interim target of a 22% reduction by January 2028, both compared to a 2018 baseline.

Table 1: The Objectives for NO_2 and PM_{10} and the $PM_{2.5}$ Limit Value

Pollutant	Concentration Measured As	Objective/Limit Value
NO_2	1-hour Mean	200 µg/m^3 not to be exceeded more than 18 times a year
	Annual Mean	40 µg/m^3
PM_{10}	24-hour Mean	50 µg/m^3 not to be exceeded more than 35 times a year
	Annual Mean	40 µg/m^3
$PM_{2.5}$	Annual Mean	20 µg/m^3

2.1.7 The objectives for human health apply at locations where members of the public are likely to be regularly present and are likely to be exposed for a period of time appropriate to the averaging period of the objective. Examples of where the objectives should apply are provided in the Local Air Quality Management Technical Guidance (Defra, 2022) issued by the Department for Environment, Food and Rural Affairs (Defra). The annual mean NO_2 and PM_{10} objectives should apply at the building façades of residential properties, schools, hospitals, care homes etc.; they should not apply at the building façades of places of work, hotels, gardens or kerbside sites. The 24-hour mean PM_{10} objective should apply at all locations where the annual mean objective applies, as well as the gardens of residential properties and hotels. The 1-hour mean NO_2 objective should apply at all locations where the annual and 24-hour mean objectives apply, as well as at kerbside sites where the public have regular access, e.g., the pavements of busy shopping streets.

2.2. Planning Policy

National Policies and Guidance

2.2.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied (Ministry of Housing, Communities and Local Government, 2024). It provides a framework within which locally prepared plans for development can be produced. At Paragraph 8c, the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development and includes an overarching environmental objective:

"To protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently,

minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

2.2.2 With regard to environmental impacts from traffic, at Paragraph 109 the NPPF states that:

"Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:…

f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains."

2.2.3 The NPPF also states at Paragraph 187 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; …"

2.2.4 The NPPF goes on to state at Paragraph 198:

"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."

2.2.5 With specific reference to air quality, the NPPF states at Paragraph 199 that:

"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."

2.2.6 The NPPF also includes the following statement at Paragraph 201:

"The focus of planning policies and decisions should be on whether Proposed Development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues

should not be revisited through the permitting regimes operated by pollution control authorities."

2.2.7 The NPPF is supported by Air Quality national Planning Practice Guidance (nPPG) (Ministry of Housing, Communities and Local Government, 2019). The nPPG states that:

"The Department for Environment, Food and Rural Affairs carries out an annual national assessment of air quality using modelling and monitoring to determine compliance with relevant Limit Values. It is important that the potential impact of new development on air quality is taken into account where the national assessment indicates that relevant limits have been exceeded or are near the limit, or where the need for emissions reductions has been identified."

2.2.8 The nPPG goes on to state that:

"Whether air quality is relevant to a planning decision will depend on the proposed development and its location. Concerns could arise if the development is likely to have an adverse effect on air quality in areas where it is already known to be poor, particularly if it could affect the implementation of air quality strategies and action plans and/or breach legal obligations (including those relating to the conservation of habitats and species). Air quality may also be a material consideration if the proposed development would be particularly sensitive to poor air quality in its vicinity."

2.2.9 The nPPG also sets out the information that may be required in an air quality assessment, stating that:

"Assessments need to be proportionate to the nature and scale of development proposed and the potential impacts (taking into account existing air quality conditions), and because of this are likely to be locationally specific."

2.2.10 It also provides guidance on options for mitigating air quality impacts, and makes clear that:

"Mitigation options will need to be locationally specific, will depend on the proposed development and need to be proportionate to the likely impact."

2.2.11 Defra is developing guidance for applicants and Planning Authorities in England to demonstrate that they have appropriately considered the $PM_{2.5}$ targets when making planning applications and planning decisions. The approach to assessing impacts on $PM_{2.5}$ will ensure that appropriate mitigation measures are implemented at the design stage, rather than assessing whether a scheme will result in exceedances of the target values. Pending publication of the guidance, Defra have published Interim Planning Guidance on the $PM_{2.5}$ targets (Defra, 2024). The interim guidance states:

"Applicants are advised to provide evidence in their planning applications that they have identified key sources of air pollution within their schemes and taken appropriate action to minimise emissions of $PM_{2.5}$ and its precursors as far as is reasonably practicable. If quantitative evidence is not available, a qualitative approach can be taken. This applies to all developments which would normally require an air quality assessment. More detailed assessments are expected for developments which are closer to populations, and those which are likely to have higher emissions. This

guidance is separate to how $PM_{2.5}$ should be considered within environmental permitting.

The following questions are designed to be used as prompts to support the interim process, but applicants are welcome to consider measures in addition to those listed below:

1. How has exposure to $PM_{2.5}$ been considered when selecting the development site?

Applicants are advised to consider the following in their application:

- *Site proximity to people (particularly large populations and/or vulnerable groups, e.g. schools, hospitals, care homes, areas of deprivation) and the impact of the development on these,*
- *Site proximity to pollution sources and the impact of these on users of the development,*
- *Exposure and emissions during both construction and in-use.*

2. What actions and/or mitigations have been considered to reduce $PM_{2.5}$ exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of $PM_{2.5}$ and its precursors?

Applicants are advised to explain (with evidence where possible) why each measure was implemented. Or, if no mitigation measures have been implemented, why this was not proposed. Actions can refer to, but are not limited to, the following:

- *Site layout,*
- *The development's design,*
- *Technology used in the construction or installed for use in the development,*
- *Construction and future use of the development.*

Planning Authorities are encouraged to consider the cumulative impact of development both in developing their Local Plan and when making decisions on a case-by-case basis. Whilst contributions from individual developments may be small, cumulatively they can lead to an increase in regional exposure, and so will have public health impacts and affect progress towards the targets."

Local Policies

2.2.12 The Kirklees Local Plan Strategy and Policies includes Policy LP51 Protection and Improvement of Local Air Quality (Kirklees Council, 2019), which states:

"1. Development will be expected to demonstrate that it is not likely to result, directly or indirectly, in an increase in air pollution which would have an unacceptable impact on the natural and built environment or to people.

2. Proposals that have the potential to increase local air pollution either individually or cumulatively must be accompanied by evidence to show that the impact of the development has been assessed in accordance with the relevant guidance. Development which has the potential to cause levels of local air pollution to increase

must incorporate sustainable mitigation measures that reduce the level of this impact. If sustainable measures cannot be introduced the development will not be permitted.

3. 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."

3 Methodology

3.1. Existing Conditions

3.1.1 Information on existing air quality within the study area has been collated from the following sources:

- The results of monitoring and the most recent publicly available LAQM Air Quality Annual Status Report published by Kirklees Council (Kirklees Council, 2024);
- Background pollutant concentration maps published by Defra (Defra, 2025).

3.2. Road Traffic Impacts

EPUK/IAQM Screening Thresholds

3.2.1 Guidance for air quality and planning officers within local authorities, and developers and consultants involved in air quality assessments, has been published by EPUK and the IAQM in Land-Use Planning & Development Control: Planning for Air Quality. The guidance sets out criteria to help establish when an air quality assessment is likely to be considered necessary.

3.2.2 For impacts of development on the local area, a two-stage approach is suggested, with the first stage intended to screen out small developments, and developments considered likely to have insignificant air quality effects.

3.2.3 The Stage 1 criteria are as follows:

A. If any of the following apply:

- 10 or more residential units or a site area of more than 0.5ha;
- more than 1,000 m^2 of floor space for all other uses or a site area greater than 1ha

B. Coupled with any of the following:

- the development has more than 10 parking spaces
- the development will have a centralised energy facility or other centralised combustion process

Note: Consideration should still be given to the potential impacts of neighbouring sources on the site, even if an assessment of impacts of the development on the surrounding area is screened out.

3.2.4 The Stage 2 criteria are shown in **Table 2**.

Table 2: EPUK/IAQM Indicative Criteria for Requiring an Air Quality Assessment

The development will:	Indicative Criteria to Proceed to an Air Quality Assessment
1. Cause a significant change in Light Duty Vehicle (LDV) traffic flows on local roads with relevant receptors. (LDV = cars and small vans <3.5t gross vehicle weight)	A change of LDV flows of: - more than 100 AADT within or adjacent to an AQMA; - more than 500 AADT elsewhere.
2. Cause a significant change in Heavy Duty Vehicle (HDV) flows on local roads with relevant receptors. (HDV = goods vehicles + buses >3.5t gross vehicle weight)	A change of HDV flows of: - more than 25 AADT within or adjacent to an AQMA; - more than 100 AADT elsewhere.
3. Realign roads, i.e. changing the proximity of receptors to traffic lanes.	Where the change is 5m or more and the road is within an AQMA.
4. Introduce a new junction or remove an existing junction near to relevant receptors.	Applies to junctions that cause traffic to significantly change vehicle accelerate/decelerate, e.g. traffic lights, or roundabouts.
5. Introduce or change a bus station.	Where bus flows will change by: - more than 25 AADT within or adjacent to an AQMA; - more than 100 AADT elsewhere.
6. Have an underground car park with extraction system.	The ventilation extract for the car park will be within 20 m of a relevant receptor; coupled with the car park having more than 100 movements per day (total in and out).
7. Have one or more substantial combustion processes	Where the combustion unit is: - any centralised plant using bio fuel; - any combustion plant with single or combined thermal input>300kW; - a standby emergency generator associated with a centralised energy centre (if likely to be tested/used >18 hours a year).

The development will:	Indicative Criteria to Proceed to an Air Quality Assessment
8. Have a combustion process of any size	Where the pollutants are exhausted from a vent or stack in a location and at a height that may give rise to impacts at receptors through insufficient dispersion. This criterion is intended to address those situations where a new development may be close to other buildings that could be residential and/or which could adversely affect the plume's dispersion by way of their size and/or height.

3.2.5 The EPUK/IAQM guidance is clear that:

"If none of the criteria are met, then there should be no requirement to carry out an air quality assessment for the impact of the development on the local area, and the impacts can be considered as having an insignificant effect."

3.2.6 The criteria in the EPUK/IAQM guidance and professional judgement have been used to screen the requirement for a full air quality assessment, with the professional experience of the consultant preparing this report set out in **Appendix A1**.

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

3.2.7 A three-stage air quality assessment process has been set out in the Air Quality & Emissions Technical Planning Guidance published by the West Yorkshire Low Emissions Group (West Yorkshire Low Emissions Group, 2018):

1. Determining the classification of the development proposal;
2. Assessing and quantifying the impact on local air quality; and
3. Determining the level of mitigation required by the proposal to meet Local Development Plan requirements.

3.2.8 Full details of the development classification method are set out in the guidance; however, in general, the classification is based on the size of the development, the level of traffic generated by the development and whether the development is located within an AQMA.

4 Baseline Conditions

4.1. LAQM Review and Assessment

4.1.1 Kirklees Council has declared ten AQMAs, nine for exceedances of the annual mean NO_2 objective and one for exceedances of the 24-hour mean PM_{10} objective. The application site is located approximately 1.3km from the closest AQMA and traffic generated by the proposed development may affect the AQMA (see **Figure 2**).

4.2. Local Air Quality Monitoring

4.2.1 Kirklees Council operates one automatic monitoring site and an NO_2 diffusion tube monitoring network. Data from the automatic monitoring site and diffusion tubes located within 1.5km of the application site are shown in **Table 3**, **Table 4**, **Table 5** and **Table 6**, with the monitoring locations shown in **Figure 2**.

4.2.2 Annual mean NO_2 concentrations at monitoring sites within 1.5km of the application site ranged from 16 to 46µg/m^3 between 2019 and 2023. Exceedances of the annual mean NO_2 objective have been measured at just one location, diffusion tube monitoring site K1, which is located at the entrance to Dewsbury Bus Station. There is an overall decreasing trend in annual mean NO_2 concentrations and in 2023 there were no exceedances of the objective and the measured range was 16 to 39.3µg/m^3.

4.2.3 Concentrations measured in 2020 and 2021 were likely to have been affected by lower road traffic emissions because of travel restrictions during the COVID-19 pandemic; however, annual mean NO_2 concentrations remain lower in 2023 when there were no travel restrictions.

4.2.4 No exceedances of the 1-hour mean objective concentration of 200µg/m^3 have been measured at the CM1 automatic monitor in any hours out of a permitted 18 hours. Measurements across the UK have shown that there is a risk of exceedances of the 1-hour NO_2 objective where the annual mean concentration is above 60µg/m^3; however, this value has not been exceeded at any of the diffusion tube monitoring sites.

4.2.5 No exceedances of the objectives for PM_{10} have been measured, with annual mean and 24-hour mean concentrations well below the objectives.

4.2.6 Annual mean concentrations of $PM_{2.5}$ are well below the limit value and are below the 2040 concentration target of 10µg/m^3.

4.3. Background Concentrations

4.3.1 Estimated background concentrations at the application site are shown in **Table 7**. The background concentrations have been derived from data in the national maps published by Defra. The background concentrations are well below the objectives/limit values.

Table 3: Measured Annual Mean NO_2 Concentrations

Site ID	Location	Site Type	Annual Mean (µg/m³) [a]				
			2019	2020	2021	2022	2023
Automatic Monitor							
CM1	Dewsbury Ashworth Grange	Urban Background	-	16	17	18	16
Diffusion Tubes							
K1	Dewsbury Bus Station	Other	**41**	**46**	**45.1**	**45.5**	39.3
K87	Mill Street West	Roadside	31.3	29.4	32.5	31.4	27.5
K29a	Dewsbury Bus Station	Other	-	24.4	26.5	28.4	26.3
K30a	Dewsbury Bus Station	Other	-	25.6	31.4	30.1	-
K54a	Wakefield Road	Roadside	32.1	29.4	37.2	38	33.2
Objective			**40**				

a Exceedances of the objective are shown in bold.

Table 4: Exceedance Statistics for the 1-hour Mean NO_2 Objective [a]

Site ID	Location	Site Type	Number of Hours > 200 µg/m³			
			2020	2021	2022	2023
CM1	Dewsbury Ashworth Grange	Urban Background	0	0	0	0
Objective			**18**			

Table 5: Summary of PM_{10} Monitoring Data

Site ID	Location	Site Type	Annual Mean (µg/m³)		Number of Days > 50 µg/m³	
			2022	2023	2022	2023
CM1	Dewsbury Ashworth Grange	Urban Background	12.6	12	0	2
Objective			**40**		**35**	

Table 6: Summary of $PM_{2.5}$ Monitoring Data

Site ID	Location	Site Type	Annual Mean (µg/m³)	
			2022	2023
CM1	Dewsbury Ashworth Grange	Urban Background	8.3	7
Limit Value			**20**	

Table 7: Estimated Annual Mean Background Concentrations in 2025 (µg/m^3)

OS Grid (x,y)	NO_2	PM_{10}	$PM_{2.5}$
425500,420500	10.9	11.2	6.5
Objective/Limit Value	**40**	**40**	**20**

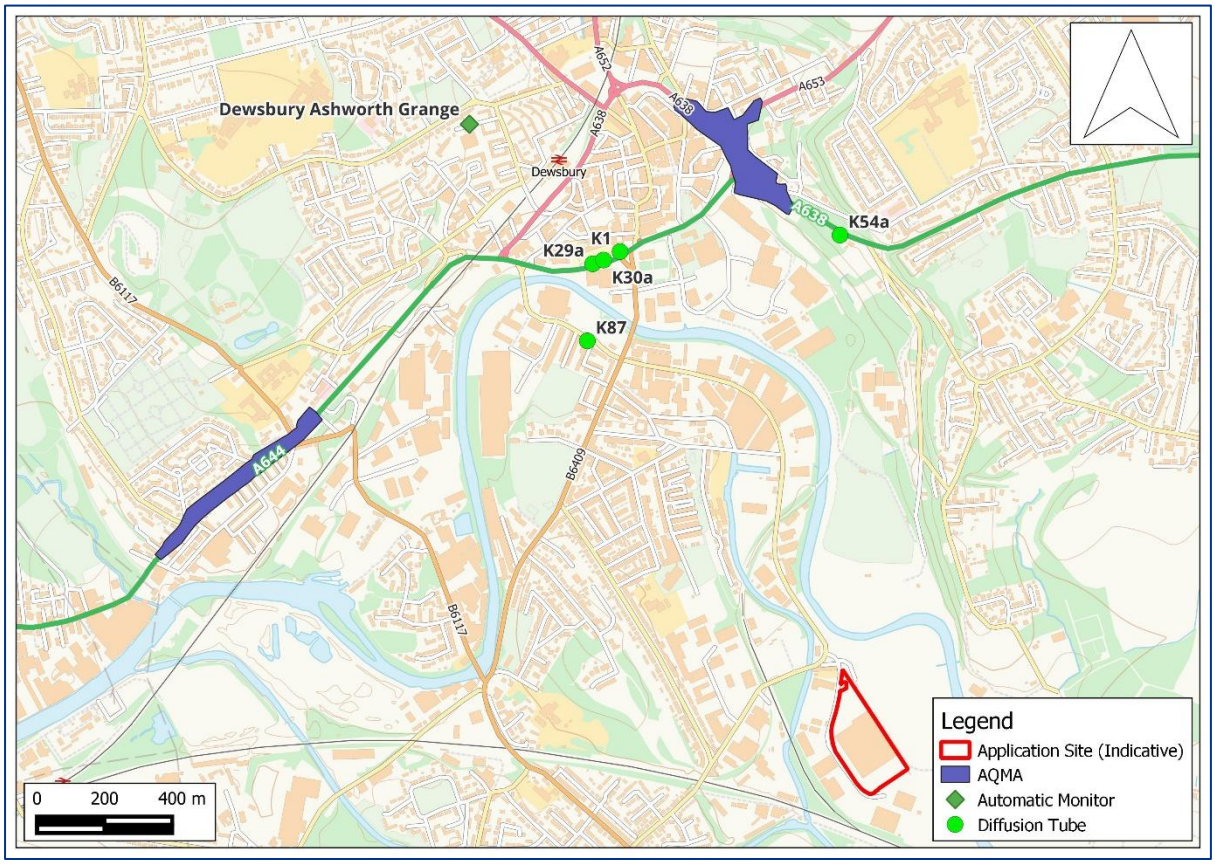

Figure 2: AQMAs and Air Quality Monitoring Sites
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5 Air Quality Assessment

5.1. Impact of the Development

Development Trips

5.1.1 The net increase in annual average daily traffic (AADT) due to the operation of the proposed development have been provided by Via Solutions Ltd. The AADT distribution is shown in **Table 8** and **Figure 3**.

Table 8: Development AADT and Distribution

Road	AADT
Bretton Park Way	271
Bretton Street	141
Mill Street East	130
Mill Street West	63
Saville Road east of Mill Street	65
Savelle Road west of Mill Street	1

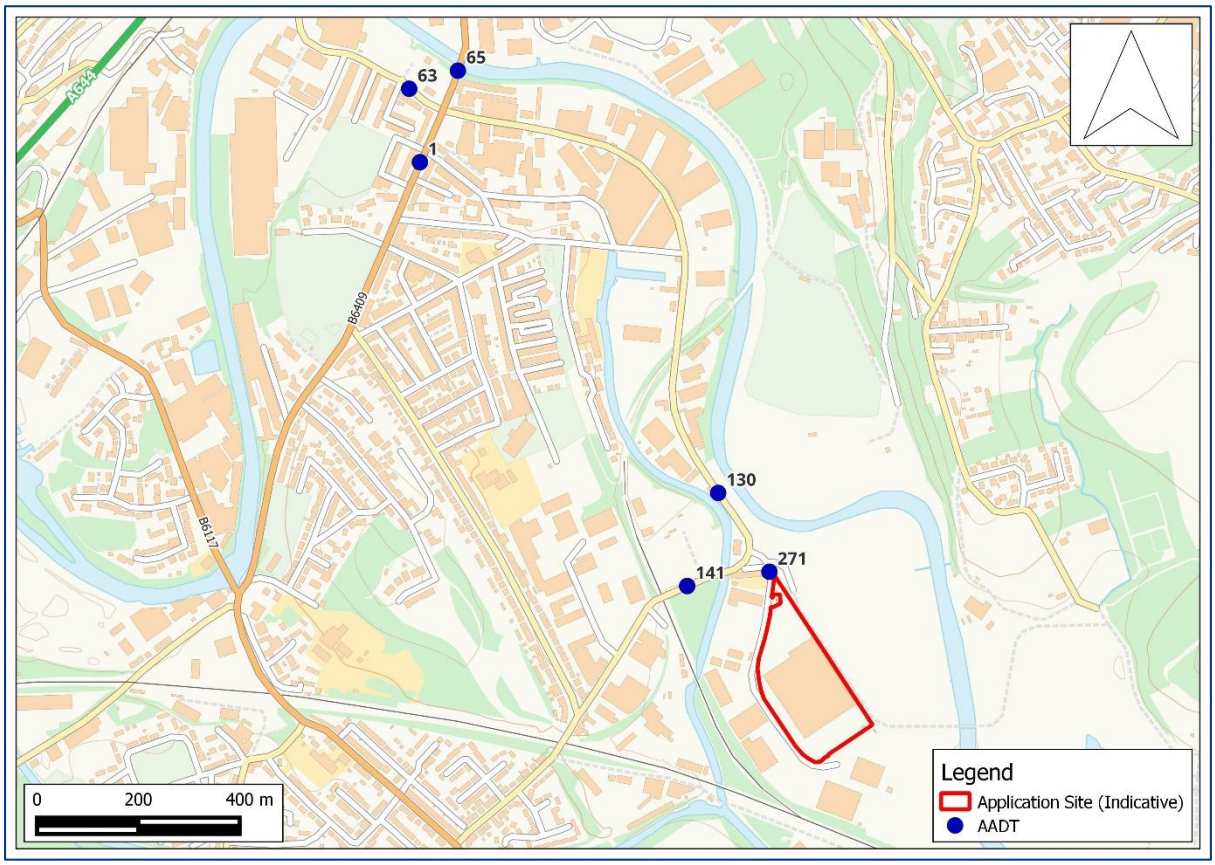

Figure 3: Development AADT and Distribution

5.1.2 The proposed development would generate an AADT of 271 onto Bretton Park Way to the north of the application site, which would then distribute across the road network.

5.1.3 Traffic from Saville Road would join the A638, which had an estimated annual average daily traffic flow of 12,805 in 2024 (DfT, 2025); therefore, the proposed development would increase traffic on the A638 by 0.5%.

IAQM Screening Criteria

Impact of the Development

5.1.4 The proposed development increases light vehicle AADTs on roads outside an AQMA by less than 500, and on roads within an AQMA by less than 100. Therefore, the proposed development falls below the threshold for a detailed air quality assessment of the impact on local air quality.

Air Quality & Emissions Technical Planning Guidance Criteria

Impact of the Development

5.1.5 With regard to the criteria for development classification in the Air Quality & Emissions Technical Planning Guidance, the floor area of the proposed development is above the Stage 1 criteria of 2,500m^2 for offices or light industry which would classify the development as a medium development.

5.1.6 The application site is not located within an AQMA and the increase in traffic is less than 5% of the existing traffic flow on the A638. Therefore, the proposed development falls below the criteria for a major development and a detailed air quality assessment of the impacts on local air quality should not be required.

5.1.7 As the proposed development has been classified as a medium development, Type 2 mitigation would be required.

5.2. Impact on the Development

5.2.1 The proposed development would consist of employment use only there would be no air quality sensitive land use; therefore, there would be no relevant exposure at the application site with regard to the air quality objectives.

6 Mitigation

6.1.1 The screening assessment has shown that the proposed development would be classified as medium in the Air Quality & Emissions Technical Planning Guidance and that Type 1 and Type 2 mitigation would be required.

6.1.2 Type 1 mitigation would require 10% of parking spaces with an electric charging point, phased, with an 5% initial provision and the remainder at an agreed trigger level (charging point specifications are provided in Appendix 4 of the Planning Guidance). The proposed development will provide 12 electric charging points out of a total of 266 parking spaces, which is 5% of the total car parking provision.

6.1.3 A Travel Plan has been produced for the proposed development, which is consistent with the recommendations for Type 2 mitigation in the Planning Guidance (Via Solutions Ltd, 2025).

6.1.4 Mitigation measures to reduce pollutant emissions from road traffic are also being delivered in the longer term by the introduction of more stringent emissions standards, largely via European legislation.

7 Conclusions

7.1.1 The air quality impacts associated with the operation of the proposed development have been assessed.

7.1.2 The proposed development would not have a significant effect on local air quality and the requirement for a detailed air quality assessment has been screened using thresholds in the EPUK/IAQM air quality guidance and the Air Quality & Emissions Technical Planning Guidance.

7.1.3 The proposed development is classified as medium in the Air Quality & Emissions Technical Planning Guidance. Type 1 and Type 2 mitigation would be required to negate the potential air quality effects of the scheme. Electric vehicle charging points will be provided and a Travel Plan has been produced in accordance with the Planning Guidance mitigation requirements.

7.1.4 The air quality effects of the development have been assessed and found to be insignificant. There should be no constraints to the development of the site with regard to air quality as the proposed development is consistent with the relevant parts of:

- the NPPF and Air Quality nPPG; and
- Policy LP51 of the Kirklees Local Plan Strategy and Policies.

8 References

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9 Appendices

A1 Professional Experience

Bob Thomas, BSc (Hons) PgDip MSc MIEnvSc MIAQM CSci

Bob Thomas is a Director at AQA, with over 22 years working in the sciences and over 18 years' experience in the field of air quality management and assessment. He has carried out air quality assessments for a wide range of developments, including residential, commercial, industrial, minerals and waste developments. He has been responsible for air quality projects that include ambient air quality monitoring of nitrogen dioxide, dust and PM_{10}, the assessment of nuisance odours and dust, and the preparation of Review and Assessment reports for local authorities. He has extensive dispersion modelling experience for road traffic, energy centre and industrial sources, and has completed many stand-alone reports and chapters for inclusion within an Environmental Statement. Bob has worked with a variety of clients to provide expert air quality services and advice, including local authorities, planners, developers, architects and process operators, and has provided expert witness services at public inquiry. He is a Chartered Scientist, a Member of the Institute of Air Quality Management and a Member of the Institution of Environmental Sciences.

A full CV for Bob Thomas is available at http://aqassessments.co.uk/about