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WASTE RESOURCE MANAGEMENT



DEAN LEWIS ESTATES LIMITED

OLD ASHFORD ROAD, LENHAM

AIR QUALITY ASSESSMENT

AUGUST 2019

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AUGUST 2019

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Appendix B: Methodology for Construction Phase Assessment

Appendix C: Methodology for Operational Phase Assessment

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DRAWINGS	TITLE	SCALE
GM10685-001	Existing and Proposed Sensitive Receptor Locations	1:5,000

EXECUTIVE SUMMARY

A detailed air quality assessment, based on the potential impacts associated with a proposed development in Lenham, Kent, has been conducted using the atmospheric dispersion model, ADMS-Roads. The proposed development consists of approximately 100 residential dwellings, a sports development and associated infrastructure.

The assessment has also considered dust and fine particulate matter during the construction phase, and road traffic emissions during the operational phase. During the construction phase, the risk of dust soiling effects is classed as high for earthworks and construction, and low for trackout; the risk of human health effects is classed as low for earthworks, construction and for trackout. Mitigation measures have been proposed to further reduce any potential impacts based on best practice guidance.

For the operational phase, annual mean NO₂, PM₁₀ and PM_{2.5} concentrations have been modelled at fifteen existing sensitive receptor locations, using the most recent Emission Factor Toolkit available from DEFRA (version 9). Predicted annual mean concentrations have been compared to the relevant air quality objectives.

The assessment concludes that the operational phase of the development will result in concentrations of NO₂, PM₁₀ and PM_{2.5} remaining below the air quality objectives, both without and with the development for the assessed year of 2024, even when using 2018 background concentrations and vehicle emission factors for a robust and conservative approach. The impact of the development is predicted to be negligible/imperceptible at all fifteen existing sensitive receptors that were assessed. Air quality effects are therefore considered to be not significant.

The assessment demonstrates that the proposed development will not lead to an unacceptable risk from air pollution, or to any breach in national objectives. Therefore, there are no material reasons in relation to air quality why the proposed scheme should not proceed, subject to appropriate planning conditions.

1 INTRODUCTION

1.1 Background

- 1.1.1 Wardell Armstrong LLP has been commissioned by Dean Lewis Estates Limited to undertake an air quality assessment for a proposed development off Old Ashford Road, Lenham, Kent.
- 1.1.2 The proposed development site is located to the south of Old Ashford Road, Lenham. From the information provided, it is understood that the proposals are for up to approximately 100 residential dwellings and associated infrastructure. The development will also provide a sports pavilion, sports pitches, a trim trail and associated car parking.
- 1.1.3 This report details the results of an air quality assessment undertaken to accompany a planning application for the proposed development. The report discusses the potential air quality impacts of the additional road traffic generated by the proposed development. Air pollutant concentrations are considered at existing sensitive receptor locations in the vicinity of the proposed development.
- 1.1.4 The report has been compiled using the most recent version of the Emission Factor Toolkit (EFT - version 9.0), which was released by DEFRA in May 2019.

2 LEGISLATION AND POLICY CONTEXT

2.1 Relevant Air Quality Legislation and Guidance

2.1.1 The air quality assessment has been undertaken in accordance with the following legislation and guidance:

- EU Ambient Air Quality Directive 2008/50/EC (i.e. the CAFE Directive);
- The Environment Act 1995;
- Department of Environment, Food and Rural Affairs, The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, July 2007;
- The Air Quality Standards Regulations 2010;
- Department for Environment, Food and Rural Affairs, Local Air Quality Management Technical Guidance LAQM.TG(16), February 2018;
- Ministry of Housing, Communities and Local Government, National Planning Policy Framework, February 2019; and
- Department for Communities and Local Government, Planning Practice Guidance: Air Quality, March 2014.

2.1.2 Further details of these documents are included in **Appendix A**.

2.2 Assessment Criteria

2.2.1 The relevant air quality objectives and limit values for this assessment are included within Table 1.

Table 1: Air Quality Objectives and Limit Values Relevant to the Assessment*			
Pollutant	Objective/Limit Value	Averaging Period	Obligation
Nitrogen Dioxide (NO ₂)	200µg/m ³ , not to be exceeded more than 18 times a year	1-hour mean	All local authorities
	40µg/m ³	Annual mean	All local authorities
Particulate Matter (PM ₁₀)	50µg/m ³ , not to be exceeded more than 35 times a year	24-hour mean	England, Wales and Northern Ireland
	40µg/m ³	Annual mean	England, Wales and Northern Ireland
	18µg/m ³	Annual mean	Scotland only
Particulate Matter (PM _{2.5})	Limit Value of 25µg/m ³	Annual mean	England, Wales and Northern Ireland
	10µg/m ³	Annual mean	Scotland only

Table 1: Air Quality Objectives and Limit Values Relevant to the Assessment*

Pollutant	Objective/Limit Value	Averaging Period	Obligation
<i>*In accordance with the Air Quality Standards Regulations 2010</i>			

2.2.2 Further details of where these objectives and limit values apply are detailed in **Appendix A.**

3 ASSESSMENT METHODOLOGY

3.1 Consultation and Scope of Assessment

3.1.1 The assessment methodology was discussed with Dr Stuart Maxwell, Senior Scientific Officer at the Mid-Kent partnership, on behalf of Maidstone Borough Council (MBC), via email correspondence between 26th June 2019 and 30th July 2019.

3.1.2 A summary of the consultation undertaken is provided in Table 2.

Table 2: Summary of Consultation		
Assessment Stage	Proposed Method	Response
Construction phase assessment to consider dust and fine particulate matter (PM ₁₀)	Qualitative assessment in accordance with Institute of Air Quality Management (IAQM) guidance	No comment
Operational phase assessment to consider nitrogen dioxide (NO ₂) and fine particulate matter (PM ₁₀ and PM _{2.5})	Detailed assessment using the ADMS-Roads atmospheric dispersion model, in accordance with Environmental Protection UK (EPUK)/IAQM guidance, and with all predicted concentrations compared to air quality objectives/limit values	No comment
	Meteorological data from Manston recording station	No comment
	Background concentrations from 2017-based DEFRA default maps	No comment
	Model verification to be undertaken using a suitable local authority diffusion tube.	No comment
	Proposed scenarios: <ul style="list-style-type: none"> • A base year (2018); and • A proposed opening year (2024), with and without the development in place. 	No comment

3.1.3 Dr Maxwell advised that our methodology looked 'fine'. However, for a development of this size a damage cost calculation would be required.

3.2 Construction Phase Assessment

3.2.1 To assess the impacts associated with dust and fine particulate matter releases during the construction phase of the development, an assessment has been undertaken in accordance with guidance from the Institute of Air Quality Management (IAQM)¹.

¹ Institute of Air Quality Management, Guidance on the Assessment of Dust from Demolition and Construction, February 2014

Further details of the construction assessment methodology are provided in **Appendix B**.

- 3.2.2 The closest sensitive human receptors to where construction phase activities will take place are mostly residential and are detailed in Table 3.

Table 3: Existing Sensitive Receptors Considered in the Construction Phase Assessment		
Receptor	Direction from the Site	Approximate Distance from the Site Boundary (m)
Existing Industrial Units on land north of Old Ashford Road	North	15m at the closest point
Existing Residential Property on Old Ashford Road	East	50m at the closest point
Existing Residential Properties on Old Ashford Road	West	15m at the closest point

- 3.2.3 There are no potentially sensitive statutory habitat sites located within 50m of the site boundary and/or within 50m of the route(s) used by construction vehicles on the public highway, up to 500m from the site entrance(s). It is not therefore necessary to consider ecological receptors within the construction phase assessment.
- 3.2.4 The criteria used to assess the construction impact of the proposed development, and the associated significance of effects at existing sensitive receptors, are included in **Appendix B**.

3.3 Operational Phase Assessment

- 3.3.1 The air dispersion model ADMS-Roads (CERC, Version 4.1) has been used to assess the impacts associated with road traffic emissions during the operational phase assessment. The impacts have been assessed in accordance with guidance from Environmental Protection UK (EPUK) and the IAQM². Further details of the modelling and assessment methodology are provided in **Appendix C**.
- 3.3.2 NO₂, PM₁₀ and PM_{2.5} concentrations have been predicted at existing and proposed sensitive receptors, as these are the pollutants considered most likely to exceed the objectives and limit values.

² Moorcroft and Barrowcliffe et al, Land-Use Planning and Development Control: Planning for Air Quality (v1.2), January 2017

3.3.3 Air dispersion modelling has been carried out to estimate pollutant concentrations, due to road traffic emissions, for three assessment scenarios as follows:

- **Scenario 1:** 2018 Verification and Base Year, the most recent year for which traffic flow information, meteorological data and local pollution data are available;
- **Scenario 2:** 2024 Opening Year, without the proposed development in place; and
- **Scenario 3:** 2024 Opening Year, with the proposed development in place.

Existing Sensitive Receptors

3.3.4 A number of representative existing sensitive receptors (identified as ESR 1 to ESR 15) have been selected for consideration in the air quality assessment. These have been chosen based on their proximity to roads which will be affected by development generated traffic.

3.3.5 Details of these receptors considered are provided in Table 4, and their locations are shown on drawing GM10685-001.

Table 4: Existing Sensitive Receptors Considered in Operational Phase Assessment				
Receptor	Address	Grid Reference		Receptor Type
		Easting	Northing	
ESR 1	Dwellings located on Maidstone Road	589383	152433	Residential
ESR 2		589747	152192	Residential
ESR 3		589797	152166	Residential
ESR 4	Dwellings located on High Street	589795	152125	Residential
ESR 5		589801	152103	Residential
ESR 6	Dwellings located on Faversham Road	589859	152230	Residential
ESR 7		589880	152238	Residential
ESR 8		589983	152367	Residential
ESR 9		590006	152407	Residential
ESR 10	Dwellings located on Old Ashford Road	589915	152172	Residential
ESR 11		589962	152161	Residential

Table 4: Existing Sensitive Receptors Considered in Operational Phase Assessment				
Receptor	Address	Grid Reference		Receptor Type
		Easting	Northing	
ESR 12		590517	151989	Residential
ESR 13		590556	151977	Residential
ESR 14		590549	151949	Residential
ESR 15		591003	152022	Residential

3.3.6 The criteria used to assess the operational impact of the proposed development, and the associated significance of effects at existing sensitive receptors, are included in **Appendix C**.

Proposed Sensitive Receptors

3.3.7 Proposed sensitive receptors (referred to as PR 1 and PR 2) have been selected within the development site boundary.

3.3.8 Pollutant concentrations at the proposed receptors have been predicted for scenario 3 only (as detailed in paragraph 3.3.3). It is only necessary to consider the 'with development' scenario for the proposed receptors as they will not experience any 'without development' conditions. It is not therefore necessary to consider the changes in pollutant concentrations at the proposed receptors.

3.3.9 Details of the proposed sensitive receptors are provided in Table 5, and the location is shown on drawing GM10685-001.

Table 5: Proposed Sensitive Receptors Considered in the Operational Phase Assessment			
Receptor Point	Location	Grid Reference	
		Easting	Northing
PR 1	Location considered to be representative of the closest proposed residential properties to the site access and Old Ashford Road	590757	152000
PR 2		590797	152002

3.3.10 The predicted concentrations at the proposed receptors have been assessed against the air quality objectives and limit values detailed in Table 1.

Existing Sensitive Ecological Receptor Locations

- 3.3.11 There are no existing sensitive habitats located within 200m of any roads that development generated traffic will use. Therefore, an operational phase air quality ecological assessment has not been undertaken.

3.4 Limitations and Uncertainties

- 3.4.1 At present, there is a degree of uncertainty associated with the prediction of future NO₂ concentrations, and consequently the assessment of impacts relating to development generated road traffic emissions.
- 3.4.2 Air quality assessments make use of official sources of information (i.e. vehicle emission factors and background concentrations) which are increasingly considered to be overly optimistic. Monitoring data collected by the UK Government and local authorities shows that annual mean NO₂ concentrations have remained higher than previously expected (especially in roadside locations). This is widely thought to be due to the lower than expected decline in NO_x emissions from diesel vehicles (even as new Euro standards have been introduced), coupled with an overall increase in the number of diesel vehicles on the road.
- 3.4.3 The vehicle emission factors used in this assessment are from Defra's Emission Factor Toolkit (EFT v9.0.³), which is the most up-to-date version available. Although this is considered to be more realistic than earlier versions, uncertainty remains.
- 3.4.4 A position statement has recently been produced by the IAQM which deals specifically with the use of EFT v8.0 and the consideration of uncertainties in predicting future air quality⁴. The statement concludes that the approaches for dealing with this uncertainty should be decided on a case-by-case basis, but may include use of a sensitivity test in which it is assumed that NO_x emissions will not reduce as quickly as within the EFT. The statement also highlights the need for careful consideration of the results of any sensitivity test, particularly with regard to assessing impacts and the significance of effects. A precautionary approach is recommended. As yet no IAQM update has been provided for EFTv9, however it is considered that uncertainty still exists.

³ Defra Local Air Quality Management webpages (<https://laqm.defra.gov.uk/review-and-assessment/tools/emissions-factors-toolkit.html>)

⁴ Institute of Air Quality Management, Dealing with Uncertainty in Vehicle NO_x Emissions within Air Quality Assessments v1.1, July 2018

- 3.4.5 This assessment has taken into account the uncertainties associated with predicting future air quality by applying 2018 background pollution concentrations and vehicle emission factors to the 2024 opening year, to provide a robust conservative approach. Further details of the methodology are provided in **Appendix C** and the results are detailed in section 5 of this report.

4 BASELINE SITUATION

4.1 Maidstone Borough Council Local Air Quality Management

- 4.1.1 The proposed development site is located within the administrative area of Maidstone Borough Council (MBC), which is responsible for the management of local air quality.
- 4.1.2 There is currently one Air Quality Management Area declared by MBC located in Maidstone approximately 12km from the proposed development.
- 4.1.3 There is one roadside NO₂ diffusion tube located near to the development in Harrietsham. Monitoring data for 2018, provided by MBC, showed the annual mean NO₂ concentration was 23.70µg/m³.

4.2 Background Air Pollutant Concentrations

- 4.2.1 The air quality assessment needs to take into account background concentrations upon which the local, traffic derived pollution is superimposed.
- 4.2.2 As there are currently no representative background NO₂, PM₁₀ or PM_{2.5} monitoring locations in the vicinity of the proposed development site, background concentrations have been obtained from the 2017-based Defra default concentration maps, for the appropriate grid squares⁵.
- 4.2.3 The background pollutant concentrations used in this assessment are detailed in Table 6.

Table 6: Background Pollutant Concentrations Used in the Air Quality Assessment.				
Pollutant	Annual Mean Concentrations (µg/m ³)			
	NO _x	NO ₂	PM ₁₀	PM _{2.5}
2018 Base Year*				
ESR 1 – ESR 8, ESR 10 & ESR 11 (589500, 152500)	15.70	11.47	16.78	10.61
ESR 9, PR 1 & PR 2 (590500, 152500)	14.79	10.87	16.87	10.34
ESR 12 – ESR 14 (590500, 151500)	14.06	10.39	15.35	9.84
ESR 15 (591500, 152500)	13.42	9.94	16.24	10.00
*Obtained from the Defra 2017-based background map				

⁵ Accessed through the Defra Local Air Quality Management webpages (<http://laqm.defra.gov.uk/review-and-assessment/tools/background-maps.html>)

4.3 Modelled Baseline Concentrations at Existing Sensitive Receptors

4.3.1 The baseline assessment (i.e. scenarios 1 and 2) has been carried out for the existing sensitive receptors considered. The adjusted NO₂ and unadjusted PM₁₀ and PM_{2.5} concentrations are detailed in Table 7.

Table 7: Predicted Adjusted NO ₂ and Unadjusted PM ₁₀ and PM _{2.5} Concentrations at Existing Sensitive Receptors for Scenarios 1 and 2						
Receptor	Calculated Annual Mean Concentrations (µg/m ³)					
	Scenario 1: 2018 Base Year			Scenario 2: 2024 Opening Year, Without Development		
	NO ₂	PM ₁₀	PM _{2.5}	NO ₂	PM ₁₀	PM _{2.5}
ESR 1	14.96	17.04	10.76	15.35	17.07	10.78
ESR 2	12.93	16.89	10.68	13.24	16.92	10.69
ESR 3	15.47	17.06	10.78	16.52	17.14	10.82
ESR 4	14.97	17.05	10.77	15.50	17.10	10.79
ESR 5	16.40	17.17	10.83	17.13	17.23	10.87
ESR 6	14.52	17.02	10.75	15.01	17.05	10.77
ESR 7	14.81	17.04	10.76	15.34	17.08	10.78
ESR 8	18.47	17.30	10.91	19.04	17.34	10.94
ESR 9	19.07	17.47	10.69	19.67	17.52	10.71
ESR 10	15.26	17.07	10.78	16.17	17.14	10.82
ESR 11	14.66	17.03	10.75	15.41	17.09	10.79
ESR 12	12.42	15.51	9.93	12.67	15.53	9.94
ESR 13	11.72	15.45	9.90	11.87	15.47	9.90
ESR 14	11.20	15.41	9.87	11.28	15.42	9.88
ESR 15	14.27	16.55	10.19	14.59	16.58	10.20
NO ₂ concentrations obtained by inputting predicted NO _x concentrations into the NO _x to NO ₂ calculator ⁶ in accordance with LAQM.TG(16)						

4.3.2 The results show that all predicted NO₂, PM₁₀ and PM_{2.5} concentrations are below the relevant objectives and limit values.

⁶ Defra Local Air Quality Management webpages (<http://laqm.defra.gov.uk/tools-monitoring-data/no-calculator.html>)

5 IMPACT ASSESSMENT

5.1 Construction Phase Assessment

Step 2 – Impact Assessment

5.1.1 In accordance with the IAQM guidance, the main activities to be considered during the construction phase of the proposed development are demolition, earthworks, construction and trackout. There are no demolition activities associated with the proposed development.

5.1.2 Earthworks covers the processes of soil-stripping, ground-levelling, excavation and landscaping. Construction activities will focus on the proposed buildings, access roads car parking areas. Trackout is defined as the transport of dust and dirt by vehicles travelling from a construction site on to the public road network. This may occur through the spillage of dusty materials onto road surfaces or through the transportation of dirt by vehicles that have travelled over muddy ground on the site. This dust and dirt can then be deposited and resuspended by other vehicles.

Step 2A

5.1.3 Step 2A of the assessment defines the potential dust emission magnitude from earthworks, construction and trackout in the absence of site-specific mitigation.

5.1.4 Examples of the criteria for the dust emission classes are detailed in **Appendix B**. The results of this step are detailed in Table 8.

Step 2B

5.1.5 Step 2B of the construction phase dust assessment defines the sensitivity of the area, taking into account the significance criteria detailed in **Appendix B**, for earthworks, construction and trackout. The sensitivity of the area to each activity is assessed for potential dust soiling, human health effects and ecological effects.

5.1.6 For earthworks and construction, there are currently between 10 and 100 receptors (mainly residential) within 50m of where these activities may take place, which is assumed to be the site boundary for the purposes of this assessment.

5.1.7 As a result, for trackout, there are between 1 and 10 receptors (mainly residential) within 50m of where trackout may occur for a distance of up to 500m from the site entrance, assuming that the construction vehicles turn east along Old Ashford Road and onto the A20.

Step 2C

- 5.1.8 Step 2C of the construction phase dust assessment defines the risk of impacts from each activity, by combining the dust emission magnitude with the sensitivity of the surrounding area.
- 5.1.9 The risk of dust impacts from each activity, with no mitigation in place, has been assessed in accordance with the criteria detailed in **Appendix B**. The results of this step are detailed in Table 7.

Summary of Step 2

- 5.1.10 Table 8 details the results of Step 2 of the construction phase assessment for human receptors.

Table 8: Construction Phase Dust Assessment for Human Receptors				
	Activity			
	Demolition	Earthworks	Construction	Trackout
Step 2A				
Dust Emission Magnitude	N/A	Large ^a	Large ^b	Medium ^c
Step 2B				
Sensitivity of Closest Receptors	N/A	High	High	High
Sensitivity of Area to Dust Soiling Effects	N/A	High	High	Medium
Sensitivity of Area to Human Health Effects	N/A	Low ^d	Low ^d	Low ^d
Step 2C				
Dust Risk: Dust Soiling	N/A	High Risk	High Risk	Low Risk
Dust Risk: Human Health	N/A	Low Risk	Low Risk	Low Risk
<p><i>b. Total site area estimated to be greater than 10,000m²</i></p> <p><i>c. Total building volume estimated to be greater than 100,000m³, with potentially dusty construction materials</i></p> <p><i>d. Number of construction phase vehicles estimated to be between 10 and 50 movements per day</i></p> <p><i>e. Background annual mean PM₁₀ concentration is taken from the LAQM Defra default concentration maps, for the appropriate grid square for 2018</i></p>				

Step 3 – Mitigation

5.1.11 During the construction phase, the implementation of effective mitigation measures will substantially reduce the potential for nuisance dust and particulate matter to be generated.

5.1.12 Step 2C of the assessment has identified that the risk of dust soiling and human health effects is not negligible for all the activities and therefore site-specific mitigation will need to be implemented to ensure dust effects from these activities will be not significant.

Recommendations for Site-Specific Mitigation

5.1.13 Specific mitigation relating to dust control may be in the form of construction best practices or could include a dust management plan. Recommendations for mitigation within the IAQM guidance include:

- Revegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable;
- Protection of surfaces and exposed material from winds until disturbed areas are sealed and stable;
- Dampening down of exposed stored materials, which will be stored as far from sensitive receptors as possible;
- 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 that appropriate additional control measures are in place;
- Avoidance of activities that generate large amounts of dust during windy conditions;
- Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery;
- Avoid dry sweeping of large areas;
- Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use;
- Ensure vehicles entering and leaving the site are covered to prevent escape of materials during transport;

- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable);
- Minimisation of vehicle movements and limitation of vehicle speeds – the slower the vehicle speeds, the lower the dust generation;
- Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever the site size and layout permits; and
- Access gates to be located at least 10m from receptors, where possible.

5.1.14 All dust and air quality complaints should be recorded, and appropriate measures be taken to identify causes and reduce emissions in a timely manner. Exceptional incidents which cause dust and/or emissions, and the action taken to resolve the situation, should be recorded in a log book and made available to MBC on request.

5.1.15 It is recognised that the final design solutions will be developed with the input of the Contractor to maximise construction efficiencies, to use modern construction techniques and sustainable materials and to incorporate the particular skills and experience offered by the appointed contractor.

Step 4 – Residual Effects

5.1.16 Step 4 of the construction phase dust assessment has been undertaken to determine the significance of the dust effects arising from demolition, earthworks, construction and trackout associated with the proposed development.

5.1.17 The implementation of effective mitigation measures during the construction phase, such as those detailed in Step 3, will substantially reduce the potential for nuisance dust and particulate matter to be generated and any residual impact should be **not significant**.

5.2 Operational Phase – Impact Assessment

Existing Sensitive Human Receptors

5.2.1 The impact assessment has been carried out for the representative existing sensitive receptors considered (i.e. ESR 1 to ESR 15).

5.2.2 Table 9 details the predicted NO₂ concentrations for the 2024 Opening Year, for both the 'Without Development' and 'With Development' scenarios. The impact has been assessed in accordance with the descriptors included in the EPUK/IAQM Guidance and

the Kent and Medway Air Quality Planning Guidance. Full details are included in **Appendix C**.

Table 9: Predicted Adjusted NO₂ Concentrations at Existing Sensitive Receptors for Scenarios 2 and 3					
Receptor	Calculated Annual Mean NO₂ Concentrations (µg/m³)^a				
	Without Development	With Development		Concentration Change as Percentage of AQAL	Impact^b
		Concentration	Percentage in Relation to AQAL		
ESR 1	15.35	15.45	<75%	<0.5%	Negligible
ESR 2	13.24	13.27	<75%	<0.5%	Negligible
ESR 3	16.52	16.55	<75%	<0.5%	Negligible
ESR 4	15.50	15.55	<75%	<0.5%	Negligible
ESR 5	17.13	17.20	<75%	<0.5%	Negligible
ESR 6	15.01	15.04	<75%	<0.5%	Negligible
ESR 7	15.34	15.37	<75%	<0.5%	Negligible
ESR 8	19.04	19.23	<75%	<0.5%	Negligible
ESR 9	19.67	19.92	<75%	1%	Negligible
ESR 10	16.17	16.24	<75%	<0.5%	Negligible
ESR 11	15.41	15.48	<75%	<0.5%	Negligible
ESR 12	12.67	12.74	<75%	<0.5%	Negligible
ESR 13	11.87	11.97	<75%	<0.5%	Negligible
ESR 14	11.28	11.38	<75%	<0.5%	Negligible
ESR 15	14.57	14.67	<75%	<0.5%	Negligible
<p><i>a. NO₂ concentrations obtained by inputting predicted NO_x concentrations into the NO_x to NO₂ calculator, in accordance with LAQM.TG(16)</i></p> <p><i>b. Assessed using the Impact Descriptors from the EPUK/IAQM guidance, included in Appendix C. Changes of less than 0.5% should be described as negligible</i></p>					

5.2.3 Table 10 details the PM₁₀ concentrations for the 2024 Opening Year, for both the 'Without Development' and 'With Development' scenarios. The impact has been assessed in accordance with the descriptors included in **Appendix C**.

Table 10: Predicted Unadjusted PM₁₀ Concentrations at Existing Sensitive Receptors for Scenarios 2 and 3					
Receptor	Calculated Annual Mean PM₁₀ Concentrations (µg/m³)				
	Without Development	With Development		Concentration Change as Percentage of AQAL	Impact^a
		Concentration	Percentage in Relation to AQAL		
ESR 1	17.07	17.08	<75%	<0.5%	Negligible
ESR 2	16.92	16.92	<75%	<0.5%	Negligible
ESR 3	17.14	17.14	<75%	<0.5%	Negligible
ESR 4	17.10	17.10	<75%	<0.5%	Negligible
ESR 5	17.23	17.23	<75%	<0.5%	Negligible
ESR 6	17.05	17.06	<75%	<0.5%	Negligible
ESR 7	17.08	17.08	<75%	<0.5%	Negligible
ESR 8	17.34	17.36	<75%	<0.5%	Negligible
ESR 9	17.52	17.54	<75%	<0.5%	Negligible
ESR 10	17.14	17.15	<75%	<0.5%	Negligible
ESR 11	17.09	17.09	<75%	<0.5%	Negligible
ESR 12	15.53	15.53	<75%	<0.5%	Negligible
ESR 13	15.47	15.47	<75%	<0.5%	Negligible
ESR 14	15.42	15.43	<75%	<0.5%	Negligible
ESR 15	16.58	16.58	<75%	<0.5%	Negligible
<i>a. Assessed using the Impact Descriptors from the EPUK/IAQM guidance, included in Appendix C. Changes of less than 0.5% should be described as negligible</i>					

5.2.4 Table 11 details the PM_{2.5} concentrations for the 2024 Opening Year, for both the 'Without Development' and 'With Development' scenarios. The impact has been assessed in accordance with the descriptors included in **Appendix C**.

Table 11: Predicted Unadjusted PM_{2.5} Concentrations at Existing Sensitive Receptors for Scenarios 2 and 3

Receptor	Calculated Annual Mean PM _{2.5} Concentrations (µg/m ³)				
	Without Development	With Development		Concentration Change as Percentage of AQAL	Impact ^a
		Concentration	Percentage in Relation to AQAL		
ESR 1	10.78	10.79	<75%	<0.5%	Negligible
ESR 2	10.69	10.69	<75%	<0.5%	Negligible
ESR 3	10.82	10.82	<75%	<0.5%	Negligible
ESR 4	10.79	10.79	<75%	<0.5%	Negligible
ESR 5	10.87	10.87	<75%	<0.5%	Negligible
ESR 6	10.77	10.77	<75%	<0.5%	Negligible
ESR 7	10.78	10.78	<75%	<0.5%	Negligible
ESR 8	10.94	10.95	<75%	<0.5%	Negligible
ESR 9	10.71	10.72	<75%	<0.5%	Negligible
ESR 10	10.82	10.82	<75%	<0.5%	Negligible
ESR 11	10.79	10.79	<75%	<0.5%	Negligible
ESR 12	9.94	9.94	<75%	<0.5%	Negligible
ESR 13	9.90	9.91	<75%	<0.5%	Negligible
ESR 14	9.88	9.88	<75%	<0.5%	Negligible
ESR 15	10.20	10.21	<75%	<0.5%	Negligible
<i>a. Assessed using the Impact Descriptors from the EPUK/IAQM guidance, included in Appendix C. Changes of less than 0.5% should be described as negligible</i>					

5.2.5 The results of the assessment show that all predicted NO₂, PM₁₀ and PM_{2.5} concentrations, in all scenarios considered, are below the relevant objectives and limit values.

5.2.6 Additionally, using the impact descriptors included in the Kent and Medway Air Quality Planning Guidance, all receptors in all scenarios considered have a Low/Imperceptible impact.

Proposed Sensitive Human Receptors

5.2.7 Pollutant concentrations have been modelled for proposed receptors for the 2024 'With Development' scenario, as detailed in Table 12.

Table 12: Predicted Adjusted NO₂, and Unadjusted PM₁₀ and PM_{2.5} Concentrations at the Proposed Sensitive Receptor for Scenario 3			
Proposed Receptor	Calculated Annual Mean Concentrations (µg/m³)		
	NO₂	PM₁₀	PM_{2.5}
PR 1	13.00	17.03	10.43
PR 2	13.07	17.03	10.43

5.2.8 The results of the assessment show that all predicted proposed receptor NO₂, PM₁₀ and PM_{2.5} concentrations are below the relevant objectives and limit values.

5.3 Assessment of Significance for Human Receptors

5.3.1 The significance of the overall effects of the proposed development has been assessed in accordance with the EPUK/IAQM guidance. This assessment is based on professional judgement and details of the assessors' experience is included in **Appendix D**.

5.3.2 The assessment of significance has taken into account a number of factors, including:

- The baseline NO₂, PM₁₀ and PM_{2.5} concentrations in 2018 and 2024 are below the relevant annual mean objectives and limit values at all existing receptors considered;
- The impact assessment predicts a negligible impact on concentrations of NO₂, PM₁₀ and PM_{2.5} at all existing sensitive receptors considered, with the development in place in 2024, even when using 2018 background concentrations and vehicle emission factors; and
- NO₂, PM₁₀ and PM_{2.5} concentrations within the proposed development site are predicted to be below the relevant objectives and limit values in all scenarios.

5.3.3 Based on the above factors, in accordance with the EPUK/IAQM guidance, the air quality effect of the proposed development is considered to be **not significant**.

5.4 Damage Cost Calculation and Recommendations for Mitigation

- 5.4.1 In accordance with the Air Quality Planning Guidance from the Kent and Medway Air Quality Partnership, an air pollution damage cost assessment has been carried out.
- 5.4.2 The damage cost assessment provides a basis for quantifying a financial commitment required to offset potential development-generated emissions and is suggested for use within the 2017 IAQM/EPUK guidance. The air pollution damage cost assessment utilises the current DEFRA Emission Factor Toolkit (version 9.0), available on the Defra website⁷, to estimate the annual link emissions associated with the additional development generated vehicles over a 5-year period.
- 5.4.3 The calculation attributes a monetary value to those emissions using the Interdepartmental Group on Costs and Benefits⁸ (IGCB) Damage Cost Guidelines. The total number of trips in a 24-hour period, generated by the proposed development, was included within the damage cost assessment to determine the transport related emissions.
- 5.4.4 The total trip generation for the proposed development (i.e. trips generated by the proposed development) in a 24-hour period is 762 vehicles. The average trip length is assumed to be 10km and the average speed is 50kph. The calculation was undertaken for both NO_x and particulate matter (PM) emissions, as these are the major pollutants associated with road traffic emissions. The IGCB gives a road transport sector estimated cost (2018) of £203,331/tonne for PM_{2.5}. For NO_x, the IGCB gives a road transport sector cost (2018) of £10,699/tonne⁹.
- 5.4.5 In accordance with the updated damage cost calculation methodology, an uplift factor of 2% per year is applied to these costs.

⁷ Defra Local Air Quality Management website (<http://laqm.defra.gov.uk/review-and-assessment/tools/emissions-factors-toolkit.html>)

⁸ Defra, Interdepartmental Group on Costs and Benefits (<https://www.gov.uk/air-quality-economic-analysis#damage-costs-approach>)

⁹ Defra, Damage costs by location and source

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/460398/air-quality-econanalysis-damagecost.pdf)

5.4.6 The EFT output (tonnes/annum) for each of the five assessed years is detailed in Table 16.

Table 16: EFT Output (tonnes/annum)		
Year	NO _x	PM _{2.5}
2024	0.590954	0.048874
2025	0.542591	0.04856
2026	0.498429	0.04834
2027	0.456598	0.04818
2028	0.419422	0.048058

5.4.7 The emissions from Table 16 are then multiplied by the uplifted estimated sector costs. Table 17 details the central transport sector cost for each assessed year, beginning with the estimated development completion year of 2024.

Table 17: Calculated Cost for Each Year (£)		
Year	NO _x	PM _{2.5}
2024	6980.68	10971.81
2025	6537.58	11119.38
2026	6125.59	11290.37
2027	5723.72	11478.26
2028	5362.86	11678.01

5.4.8 The total damage cost of both NO_x and PM_{2.5} for the proposed development over a five-year period is £87,268. The input data for the assessed year of 2024 for the damage cost calculation can be seen in Figure 1.

Select Pollutants <input checked="" type="checkbox"/> NO _x <input type="checkbox"/> CO ₂ <input type="checkbox"/> PM ₁₀ <input checked="" type="checkbox"/> PM _{2.5}		Select Outputs <input type="checkbox"/> Air Quality Modelling (g/km/s) <input type="checkbox"/> Breakdown by Vehicle <input type="checkbox"/> Emissions Rates (g/km) <input type="checkbox"/> Source Apportionment <input checked="" type="checkbox"/> Annual Link Emissions <input type="checkbox"/> PM by Source		Additional Outputs <input type="checkbox"/> Euro Compositions <input type="checkbox"/> NO _x Annual Emissions Euro Split <input type="checkbox"/> Simple Entry Euro Compositions <input type="checkbox"/> PM ₁₀ Annual Emissions Euro Split <input type="checkbox"/> Output % Contributions from Euro Classes <input type="checkbox"/> PM _{2.5} Annual Emissions Euro Split <input type="checkbox"/> Primary NO ₂ Fraction <input type="checkbox"/> Fleet Projection Tool							
Please Select from the Following Options: <table border="1"> <tr> <td>Area</td> <td>England (not London)</td> </tr> <tr> <td>Year</td> <td>2024</td> </tr> <tr> <td>Traffic Format</td> <td>Basic Split</td> </tr> </table>		Area	England (not London)	Year	2024	Traffic Format	Basic Split	Export Outputs <input type="checkbox"/> Save Output to New Workbook File Name: <input type="text"/>			
Area	England (not London)										
Year	2024										
Traffic Format	Basic Split										
Select 'Basic Split' or 'Detailed Option 1 to 3' or 'Alternative Technologies' above											
SourceID	Road Type	Traffic Flow	% HDV	Speed(kph)	No of Hours	Link Length (km)					
Old Ashford Road	Urban (not London)	762	0	50	24	10					

Mitigation Strategies

5.4.9 Based on professional judgement and recommendations in the Air Quality Planning Guidance, it is considered that mitigation measures should be employed. EV charging will be provided for every dwelling with allocated parking and 1 charging point per 10 spaces for unallocated parking. Further mitigation measures which could be implemented include:

- The implementation of a green travel plan, as well as documents showing local public transportation routes for future residents;
- Designation of parking spaces for low emission vehicles;
- Support local walking and cycling initiatives;
- Bike/e-bike hire schemes; and
- Installing low NO_x boilers at proposed dwellings.

5.4.10 The Kent and Medway Air Quality Planning Guidance suggests that the mitigation measures implemented should be equivalent to the value determined by the damage cost calculation (£87,268) and should focus on mitigating elevations in NO₂ and fine particulate matter concentrations, as a result of development-generated traffic.

6 CONCLUSIONS

6.1 Construction Phase

6.1.1 The construction phase assessment has been undertaken to determine the risk and significance of dust and fine particulate matter effects from earthworks, construction and trackout associated with the proposed development, in accordance with guidance published by the IAQM.

6.1.2 With site specific mitigation measures in place, the significance of dust and fine particulate effects from earthworks, construction and trackout is considered to be **not significant**.

6.2 Operational Phase

Existing Sensitive Receptors

6.2.1 An air quality assessment has been undertaken to consider the potential impact of development generated vehicles on air quality at fifteen existing sensitive human receptors. The assessment has applied 2018 background concentrations and vehicle emission factors for a conservative and robust 'worst-case' scenario.

6.2.2 The impact assessment predicts that the development will have a negligible/imperceptible impact on concentrations of NO₂, PM₁₀ and PM_{2.5} at all fifteen existing sensitive receptors considered in 2024.

6.2.3 The effect of the proposed development on existing sensitive human receptors is therefore considered to be **not significant**.

Proposed Sensitive Receptors

6.2.4 NO₂, PM₁₀ and PM_{2.5} concentrations within the proposed development site are predicted to be below the relevant objectives and limit values.

6.2.5 The effect of the proposed development on proposed sensitive human receptors is therefore considered to be **not significant**.

Recommendations for Mitigation

6.2.6 The impact of the proposed development is predicted to be not significant. However, mitigation measures will assist in reducing any potential impact and general best practice measures in relation to air quality could be implemented.

6.3 Summary

- 6.3.1 The air quality assessment demonstrates that the proposed development will not lead to an unacceptable risk from air pollution, nor will it lead to any breach of national objectives as required by national policy. Therefore, there are no material reasons in relation to air quality why the proposed scheme should not proceed.

Appendix A

Air Quality Legislation and Guidance

Appendix A: Air Quality Legislation and Guidance

European Legislation

- A.1 The European Union (EU) Ambient Air Quality Directive 2008/50/EC¹ (i.e. the CAFE Directive) came into force in June 2008. This EU Directive consolidates previous air quality legislation, with the exception of the 4th daughter Directive², and sets air quality limit values for seven pollutants. The Directive also provides a regulatory framework for fine particulate matter smaller than 2.5µm in diameter (PM_{2.5}).
- A.2 EU Directive 2008/50/EC was transposed into legislation in the UK on 11th June 2010 as The Air Quality Standards Regulations 2010³.

National Air Quality Strategy

- A.3 The Environment Act 1995 requires the UK government to prepare a national Air Quality Strategy. The first UK strategy was published in March 1997, setting out policies for the management of ambient air quality. This was subsequently updated in 2007⁴.
- A.4 The 2007 strategy establishes the framework for air quality management in England, Scotland, Wales and Northern Ireland. Air quality standards and objectives are set out for eight pollutants which may potentially occur at levels that give cause for concern. The strategy also provides details of the role that local authorities are required to take in working towards improvements in air quality, known as the Local Air Quality Management (LAQM) regime.

Air Quality Standards and Objectives

- A.5 Air quality standards and objectives are set out in the strategy for the following pollutants: nitrogen dioxide (NO₂), sulphur dioxide (SO₂), carbon monoxide (CO), lead (Pb), fine particulate matter (PM₁₀), benzene (C₆H₆), 1, 3-butadiene (C₄H₆) and ozone (O₃).

¹ Directive 2008/50/EC of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe

² Directive 2004/107/EC of the European Parliament and the Council of 15th December 2004 relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air

³ The Air Quality Standards Regulations 2010

⁴ Department of Environment, Food and Rural Affairs, The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. July 2007

A.6 Objectives for each pollutant, except O₃, were first given statutory status in the Air Quality Regulations 2000⁵ and Air Quality (Amendment) Regulations 2002⁶. These objectives are defined in the strategy as:

“the maximum ambient concentration not to be exceeded, either without exception or with a permitted number of exceedances, within a specified timescale.”

A.7 The EU limit values, transposed into UK legislation as The Air Quality Standards Regulations 2010, are mostly the same as the air quality objectives in terms of concentrations; however, there are differences in determining how compliance is achieved.

A.8 Whilst there is no specific objective for PM_{2.5} in England and Wales, a limit value of 25µg/m³ is referred to in the regulations, which has been adopted for use in this assessment (as recommended by the LAQM Helpdesk). An objective has been set for PM_{2.5} in Scotland since early 2016.

A.9 Examples of where these objectives and limit values apply are detailed in the Defra LAQM Technical Guidance document LAQM.TG(16)⁷ and are included in Table A1.

Table A1: Examples of Where the Air Quality Objectives Should Apply		
Averaging Period	Objectives Should Apply at:	Objectives Should Generally Not Apply at:
Annual mean	All locations where members of the public might be regularly exposed. Building façades of residential properties, schools, hospitals, care homes, etc.	Building facades of offices or other places of work where members of the public do not have regular access. Hotels, unless people live there as their permanent residence. Gardens of residential properties. Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term
24-hour mean and 8-hour mean	All locations where the annual mean objectives would apply, together with hotels. Gardens of residential properties ^a	Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term

⁵ The Air Quality Regulations 2000. SI No 928

⁶ The Air Quality (Amendment) Regulations 2002

⁷ Department for Environment, Food and Rural Affairs, Local Air Quality Management Technical Guidance LAQM.TG(16), February 2018

Table A1: Examples of Where the Air Quality Objectives Should Apply		
Averaging Period	Objectives Should Apply at:	Objectives Should Generally Not Apply at:
1-hour mean	All locations where the annual mean and 24 and 8-hour objectives apply. Kerbside sites (e.g. pavements of busy shopping streets). Those parts of car parks and railway stations etc. which are not fully enclosed, where members of the public might reasonably be expected to spend one hour or more. Any outdoor locations to which the public might reasonably be expected to spend one hour or longer	Kerbside sites where public would not be expected to have regular access
15-minute mean	All locations where members of the public might reasonably be exposed for a period of 15 minutes or longer	
<i>^a. Such locations should represent parts of the garden where relevant public exposure is likely, for example where there is seating or play areas. It is unlikely that relevant public exposure to pollutants would occur at the extremities of the garden boundary, or in front gardens, although local judgement should always be applied</i>		

Local Air Quality Management

- A.10 LAQM legislation in the Environment Act 1995 requires local authorities to conduct the periodic review and assessments of air quality. These aim to identify all those areas where the objectives are being, or are likely to be, exceeded. Where exceedances are likely to occur, local authorities are required to declare an Air Quality Management Area (AQMA).
- A.11 LAQM.TG(16) presents a streamlined approach for LAQM in England and Scotland; however, Wales and Northern Ireland are still considering changes to LAQM and therefore work according to the previous regimes.
- A.12 Local authorities in England are required to produce Annual Status Reports (ASRs), and in Scotland, Annual Progress Reports (APRs). These replace all other reports which previously had to be submitted including Updating and Screening Assessments, Progress Reports and Detailed Assessments (which would be produced to assist with an AQMA declaration).
- A.13 Local authorities now have the option of a fast track AQMA declaration option. This allows more expert judgement to be used and removes the need for a Detailed

Assessment where a local authority is confident of the outcome. Detailed Assessments should however still be used if there is any doubt.

- A.14 As part of the UK Government's requirement to improve air quality, selected local authorities in England are also currently investigating the feasibility of setting up Clean Air Zones (CAZs). These are areas where targeted action and co-ordinated resources aim to improve air quality within an urban setting, in order to achieve compliance with the EU limit values within the shortest possible time.
- A.15 Five local authorities outside of London were initially selected to implement a CAZ by 2020 (Birmingham, Leeds, Nottingham, Derby and Southampton). A further 23 local authorities were subsequently chosen to investigate the feasibility of establishing a CAZ, and 33 local authorities may potentially have to proceed to this stage where compliance is not achieved.

National Planning Policy Framework

- A.16 The National Planning Policy Framework (NPPF)⁸, introduced in March 2012 and most recently updated in February 2019, requires 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 AQMAs and CAZs, 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 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 AQMAs and CAZs is consistent with the local air quality action plan."

Planning Practice Guidance

- A.17 The Planning Practice Guidance (PPG)⁹, updated in March 2014, states that whether or not 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

⁸ Ministry of Housing, Communities and Local Government, National Planning Policy Framework, February 2019

⁹ Department for Communities and Local Government. Planning Practice Guidance: Air Quality, March 2014

generate air quality impacts in an area where air quality is known to be poor. They could also arise where the development is likely to adversely impact upon the implementation of air quality strategies and action plans and/or, in particular, lead to a breach of EU legislation (including that applicable to wildlife).

- A.18 Where a proposed development is anticipated to give rise to concerns about air quality, an appropriate assessment needs to be carried out. Where the assessment concludes that the proposed development (including mitigation) will not lead to an unacceptable risk from air pollution, prevent sustained compliance with national objectives or fail to comply with the requirements of the Habitats Regulations, then the local authority should proceed to decision with appropriate planning conditions and/or obligations.

Appendix B

Methodology for Construction Phase Assessment

Appendix B: Methodology for Construction Phase Assessment

Institute of Air Quality Management Guidance

- B.1 The methodology for the construction phase dust assessment is set out in guidance from the Institute of Air Quality Management (IAQM)¹⁰.

Step 1

- B.2 Step 1 is to screen the requirement for a more detailed assessment. The guidance states that an assessment will normally be required where there are existing sensitive human receptors within 350m of the site boundary and/or within 100m of the route(s) used by construction vehicles on the public highway, up to 500m from the site entrance(s).
- B.3 With regards to ecological receptors, the guidance states that an assessment will normally be required where there are existing receptors within 50m of the site boundary and/or within 50m of the route(s) used by construction vehicles on the public highway, up to 500m from the site entrance(s).
- B.4 Where any of these criteria are met, it is necessary to proceed to Step 2.

Step 2

- B.5 Step 2 determines the potential risk of dust arising in sufficient quantities to cause annoyance and/or health or ecological impacts. The risk is related to:
- The activities being undertaken (demolition, number of vehicles and plant etc);
 - The duration of these activities;
 - The size of the site;
 - The meteorological conditions (wind speed, direction and rainfall);
 - The proximity of receptors to the activity;
 - The adequacy of the mitigation measures applied to reduce or eliminate dust; and
 - The sensitivity of receptors to dust.
- B.6 The risk of dust impacts is determined using four risk categories: negligible, low, medium and high risk. A site is allocated to a risk category based upon the following two factors (known as Step 2A and Step 2B).

¹⁰ Institute of Air Quality Management, Guidance on the Assessment of Dust from Demolition and Construction, February 2014

B.7 **Step 2A** assesses the scale and nature of the works which determines the potential dust emission magnitude as small, medium or large. Examples of how the magnitude may be defined are included in Table B1.

Table B1: Determining the Dust Emission Magnitude of Construction Phase Activities			
Activity	Dust Emission Class		
	Large	Medium	Small
Demolition	Total building volume >50,000m ³ ; Potentially dusty construction material (e.g. concrete); On-site crushing and screening; Demolition activities >20m above ground level	Total building volume 20,000-50,000m ³ ; Potentially dusty construction material; Demolition activities 10-20m above ground level	Total building volume <20,000m ³ ; Construction material with low potential for dust release (e.g. metal cladding or timber)
Earthworks	Total site area >10,000m ² ; Potentially dusty soil type (e.g. clay, which will be prone to suspension when dry due to small particle size); >10 heavy earth moving vehicles active at any one time; Formation of bunds >8m in height; Total material moved >100,000 tonnes	Total site area 2,500-10,000m ² ; Moderately dusty soil type (e.g. silt); 5-10 heavy earth moving vehicles active at any one time; Formation of bunds 4-8m in height; Total material moved 20,000-100,000 tonnes	Total site area <2,500m ² ; Soil type with large grain size (e.g. sand); <5 heavy earth moving vehicles active at any one time; Formation of bunds <4m in height; Total material moved <20,000 tonnes; Earthworks during wetter months
Construction	Total building volume >100,000m ³ ; On-site concrete batching; Sandblasting	Total building volume 25,000-100,000m ³ ; Potentially dusty construction material (e.g. concrete); On-site batching	Total building volume <25,000m ³ ; Construction material with a low potential for dust release (e.g. metal cladding or timber)
Trackout	>50 HDV (>3.5t) outward movements ^a in any one day ^b ; Potentially dusty surface material (e.g. high clay content); Unpaved road length >100m	10-50 HDV (>3.5t) outward movements ^a in any one day ^b ; Moderately dusty surface material (e.g. high clay content); Unpaved road length 50-100m	<10 HDV (>3.5t) outward movements ^a in any one day ^b ; Surface material with low potential for dust release; Unpaved road length <50m
<p>a. A vehicle movement is a one way journey i.e. from A to B, and excludes the return journey</p> <p>b. HDV movements during a construction project may vary over its lifetime, and the number of movements is the maximum not the average</p>			

B.8 Step 2B considers the sensitivity of the area to dust impacts which is defined as low, medium or high. The sensitivity categories for different types of receptors are described in Table B2.

Table B2: Sensitivity Categories for Dust Soiling, Human Health and Ecological Effects			
Sensitivity Category	Dust Soiling Effects	Health effects of PM₁₀	Ecological Effects
High	Users can reasonably expect to enjoy a high level of amenity; Appearance, aesthetics or value of a property would be diminished; Examples include dwellings, museums and other culturally important collections, medium and long term car parks and car show rooms	Locations where members of the public are exposed over a period of time relevant to the air quality objective for PM ₁₀ ; Examples include residential properties, hospitals, schools, and residential care homes	Locations with an international or national designation and the designated features may be affected by dust soiling; Locations where there is a community of a particularly dust sensitive species; Examples include a Special Area of Conservation with dust sensitive features
Medium	Users would expect to enjoy a reasonable level of amenity, but would not reasonably expect to enjoy the same level of amenity as in their home; The appearance, aesthetics or value of their property could be diminished; People or property wouldn't reasonably be expected to be continuously present or regularly for extended periods of time; Examples include parks and places of work	Locations where people are exposed as workers and exposure is over a period of time relevant to the air quality objective for PM ₁₀ ; Examples include office and shop workers but will generally not include workers occupationally exposed to PM ₁₀	Locations where there is a particularly important plant species, where its dust sensitivity is uncertain or unknown; Locations with a national designation where the features may be affected by dust deposition; Examples include a Site of Special Scientific Interest with dust sensitive features

Table B2: Sensitivity Categories for Dust Soiling, Human Health and Ecological Effects			
Sensitivity Category	Dust Soiling Effects	Health effects of PM ₁₀	Ecological Effects
Low	Enjoyment of amenity would not reasonably be expected; Property would not be diminished in appearance, aesthetics or value; People or property would be expected to be present only for limited periods of time; Examples include playing fields, farmland (unless commercially-sensitive horticultural), footpaths, short term car parks and roads	Locations where human exposure is transient; Examples include public footpaths, playing fields, parks and shopping streets	Locations with a local designation where the features may be affected by dust deposition; Examples include a Local Nature Reserve with dust sensitive features

B.9 Based on the sensitivity of individual receptors, the overall sensitivity of the area to dust soiling, human health and ecological effects is then determined using the criteria detailed in Tables B3 to B5, respectively.

Table B3: Sensitivity of the Area to Dust Soiling Effects on People and Property ^{ab}					
Receptor Sensitivity	Number of Receptors	Distance from Source (m) ^c			
		<20m	<50m	<100m	<350m
High	>100	High	High	Medium	Low
	10-100	High	Medium	Low	Low
	1-10	Medium	Low	Low	Low
Medium	>1	Medium	Low	Low	Low
Low	>1	Low	Low	Low	Low
<p>a. The sensitivity to the area should be derived for each of the four activities</p> <p>b. Estimate the total number of receptors within the stated distance. Only the highest level of sensitivity from the table needs to be considered</p> <p>c. For trackout, distances should be measured from the side of the roads used by construction traffic. Without site specific mitigation, trackout may occur for up to 500m from large sites, 200m from medium sites and 50m from small sites, measured from the site exit. The impact declines with distance from the site and it is only necessary to consider trackout impacts up to 50m from the edge of the road</p>					

Table B4: Sensitivity of the Area to Human Health Impacts ^{ab}							
Receptor Sensitivity	Annual Mean PM ₁₀ Concentration ^c	Number of Receptors ^d	Distance from Source (m) ^e				
			<20m	<50m	<100m	<200m	<350m
High	>32µg/m ³	>100	High	High	High	Medium	Low
		10-100	High	High	Medium	Low	Low
		1-10	High	Medium	Low	Low	Low
	28-32µg/m ³	>100	High	High	Medium	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	High	Medium	Low	Low	Low
	24-28µg/m ³	>100	High	Medium	Low	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	<24µg/m ³	>100	Medium	Low	Low	Low	Low
		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Medium	>32µg/m ³	>10	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	28-32µg/m ³	>10	Medium	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	24-28µg/m ³	>10	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	<24µg/m ³	>10	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Low	-	>1	Low	Low	Low	Low	Low
<p>a. The sensitivity to the area should be derived for each of the four activities</p> <p>b. Estimate the total number of receptors within the stated distance. Only the highest level of sensitivity from the table needs to be considered</p> <p>c. Most straightforwardly taken from the national background maps, but should also take account of local sources. The values are based on 32µg/m³ being the annual mean concentration at which an exceedance of the 24-hour mean objective is likely in England, Wales and Northern Ireland. In Scotland, there is an annual mean objective of 18µg/m³</p> <p>d. In the case of high sensitivity receptors with high occupancy (such as schools or hospitals) approximate the number of people likely to be present. In the case of residential dwellings, just include the number of properties</p> <p>e. For trackout, distances should be measured from the side of the roads used by construction traffic</p>							

Table B5: Sensitivity of the Area to Ecological Impacts ^{ab}		
Receptor Sensitivity	Distance from the Source (m) ^c	
	<20	<50
High	High	Medium
Medium	Medium	Low
Low	Low	Low
a. The sensitivity to the area should be derived for each of the four activities b. Only the highest level of sensitivity from the table needs to be considered c. For trackout, distances should be measured from the side of the roads used by construction traffic		

B.10 These two factors are combined in **Step 2C** to determine the risk of dust impacts with no mitigation applied.

B.11 The risk of dust effects is determined for four types of construction phase activities, with each activity being considered separately. If a construction phase activity is not taking place on the site, then it does not need to be assessed. The four types of activities to be considered are:

- Demolition;
- Earthworks;
- Construction; and
- Trackout.

B.12 The risk of dust being generated by demolition activities at the site is determined using the criteria in Table B6.

Table B6: Risk of Dust Impacts for Demolition			
Sensitivity of Area	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Medium Risk
Medium	High Risk	Medium Risk	Low Risk
Low	Medium Risk	Low Risk	Negligible

B.13 The risk of dust being generated by earthworks and construction at the site is determined using the criteria in Table B7.

Table B7: Risk of Dust Impacts for Earthworks and Construction			
Sensitivity of Area	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible

- B.14 The risk of dust being generated by trackout at the site is determined using the criteria in Table B8.

Table B8: Risk of Dust Impacts for Trackout			
Sensitivity of Area	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Low Risk	Negligible
Low	Medium Risk	Low Risk	Negligible

Step 3

- B.15 Step 3 of the assessment determines the site-specific mitigation required for each of the activities, based on the risk determined in Step 2. Mitigation measures are detailed in guidance published by the Greater London Authority¹¹, recommended for use outside the capital by LAQM guidance, and the IAQM guidance document itself. Professional judgement should be used to determine the type and scale of mitigation measures required.
- B.16 If the risk is classed as negligible, no mitigation measures beyond those required by legislation will be necessary.

Step 4

- B.17 Step 4 assesses the residual effect, with mitigation measures in place, to determine whether or not these are significant.

¹¹ Greater London Authority, The Control of Dust and Emissions from Construction and Demolition: Best Practice Guidance, 2006

Professional Judgement

- B.18 The IAQM guidance makes reference to the use of professional judgement when assessing the risks of dust and fine particulate matter from demolition and construction sites. Details of the experience of the personnel involved with the project are provided in **Appendix D**.

Appendix C

Methodology for Operational Phase Assessment

Appendix C: Methodology for Operational Phase Assessment

Air Dispersion Modelling Inputs

- C.1 The air dispersion model ADMS-Roads (CERC, Version 4.1) has been used to assess the potential air quality impacts associated with development-generated road traffic emissions. This dispersion model is widely used and accepted for the purpose of undertaking assessments to support both planning and Environmental Permit applications.

Traffic Flow Data

- C.2 The ADMS-Roads model requires the input of detailed road traffic flow data for those routes which may be affected by the proposed development. Traffic flow data has been provided for this project by Prime Transport Planning, the appointed transport consultants for the project. The study extent of the model is shown in Figure C.1.

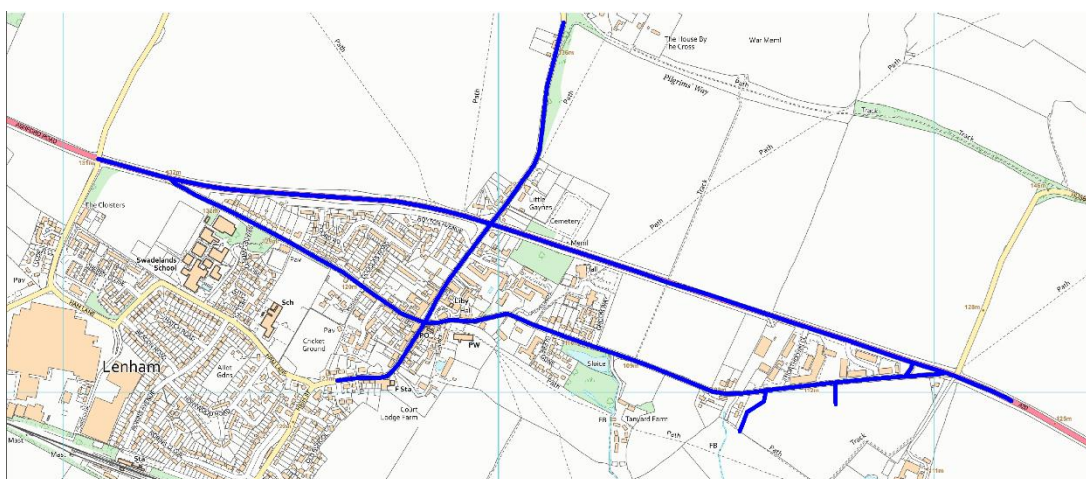


Figure C.1: Study Extent of Air Dispersion Model. The roads modelled in the assessment can be seen in blue ('Reproduced from Ordnance Survey Maps © Crown Copyright All Rights Reserved Licence No. AL100019512')

- C.3 Data has been provided as 24-hour Annual Average Daily Traffic (AADT) flows, with HGV percentages. No average speed information was available and therefore speed limits have been used, with a reduction to 25kph in locations where congestion or the slowing down of vehicles would be expected.
- C.4 The traffic flow data used in the assessment is included in Table C1.

Table C1: 24-hour AADT traffic data used in the assessment

Link Name	Scenario 1: 2018 Base Year		Scenario 2: 2024 Opening Year Without Development		Scenario 3: 2024 Opening Year With Development	
	Vehicles	HGV%	Vehicles	HGV%	Vehicles	HGV%
A20 Ashford Road to the West of Maidstone Road	14588	4.79	15983	4.43	16509	4.28
A20 Ashford Road to the East of Maidstone Road	13751	5.08	14770	4.79	15296	4.62
Maidstone Road to the South of A20 Ashford Road	875	0.00	1253	0.00	1253	0.00
Faversham Road to the North of A20 Ashford Road	2395	0.41	2630	0.37	2687	0.36
A20 Ashford Road to the East of Faversham Road	14553	4.94	15412	4.72	15995	4.54
Faversham Road to the South of A20 Ashford Road	2479	0.79	2910	0.67	2910	0.67
A20 Ashford Road to the West of Faversham Road	13845	5.12	14863	4.83	15389	4.66
A20 Ashford Road to the West of Old Ashford Road (West)	14401	5.16	15163	4.96	15746	4.77
A20 Ashford Road to the East of Old Ashford Road (West)	15306	4.92	16218	4.70	16260	4.69
Old Ashford Road (West) to the South of A20 Ashford Road	1511	0.65	1701	0.57	2327	0.41
A20 Ashford Road to the East of Old Ashford Road (East)	16797	4.48	17843	4.27	17951	4.24
Old Ashford Road (East) to the South of A20 Ashford Road	1490	0.00	1748	0.00	1813	0.00
Old Ashford Road to the West of Old Ashford Road	3001	0.33	3448	0.28	4139	0.23

Old Ashford Road to the West of Resi Access	3001	0.33	3448	0.28	3725	0.26
Old Ashford Road to the East of Resi Access	3001	0.33	3448	0.28	4139	0.23
Resi Access to the South of Old Ashford Road	0	0.00	0	0.00	508	0.00
Old Ashford Road to the West of Sports Access	3001	0.33	3448	0.28	3519	0.28
Sports Access to the South of Old Ashford Road	0	0.00	0	0.00	254	0.00
Faversham Road to the North of High Street	2513	1.36	2936	1.16	2936	1.16
Old Ashford Road to the East of Maidstone Road	3553	0.41	4603	0.32	4674	0.31
High Street to the South of Faversham Road	5124	0.76	5940	0.66	6011	0.65
Maidstone Road to the West of Old Ashford Road	1091	0.90	1483	0.65	1483	0.65

Vehicle Emission Factors

C.5 The air quality assessment has used vehicle emission factors calculated using the Emissions Factor Toolkit (EFT) version 9, released in May 2019. This is the most up-to-date version of the EFT currently available.

C.6 Meteorological Data

C.7 The meteorological data used in the air quality modelling has been obtained from ADM Limited and is from the Manston recording station, covering the period between 1st January and 31st December 2018. This has complete data capture for wind and temperature.

C.8 The Manston recording station is located approximately 40km from the proposed development and is considered to be the most representative of the conditions at the proposed development, due to its relative location and similar altitude.

C.9 The 2018 wind rose for the Manston Meteorological Recording Station is shown in Figure C2.

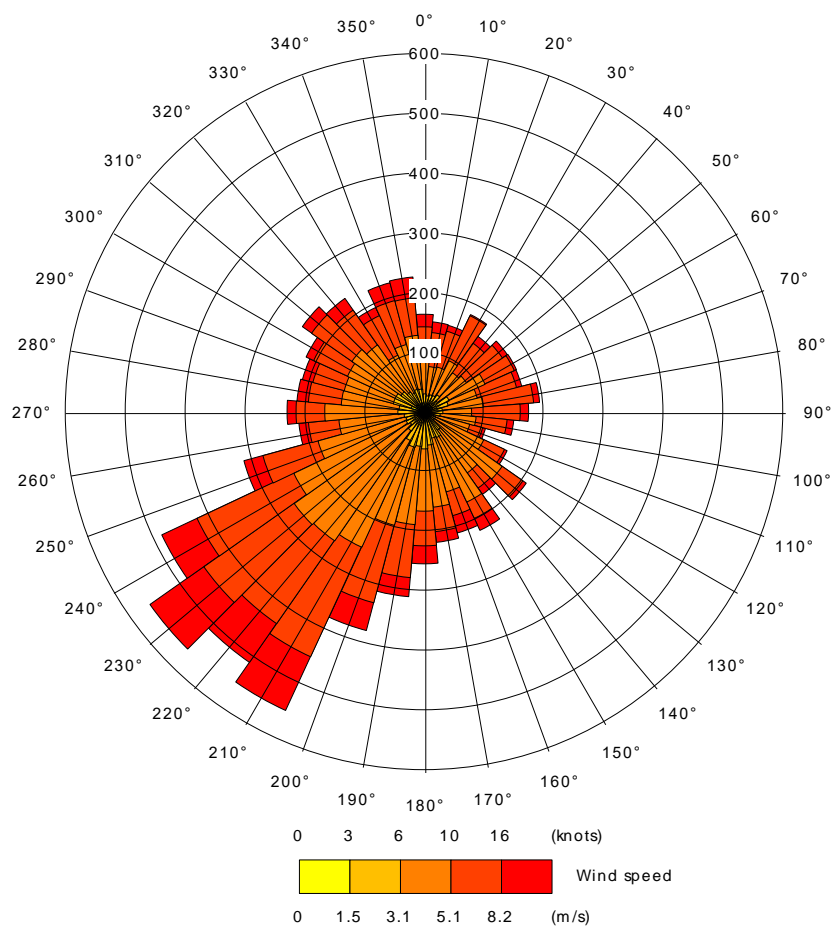


Figure C.2: 2018 Wind Rose for the Manston Meteorological Station

Dispersion and Meteorological Site Characteristics

C.10 The characteristics for the dispersion site and meteorological sites, included in the ADMS-Roads model, are detailed in Table C2.

Table C2: Dispersion and Meteorological Site Characteristics		
Setting	Dispersion Site	Meteorological Site
Surface Roughness	0.5m	0.02m
Surface Albedo	0.23	0.23
Minimum Monin-Obukhov Length	30m	1m
Priestley-Taylor Parameter	1	1

NO_x to NO₂ Conversion

- C.11 In accordance with the guidance within LAQM.TG(16), the ADMS-Roads model has been run to predict the road-contribution NO_x concentrations for each receptor location. These have then been converted to NO₂ concentrations using the Defra NO_x to NO₂ calculator¹².

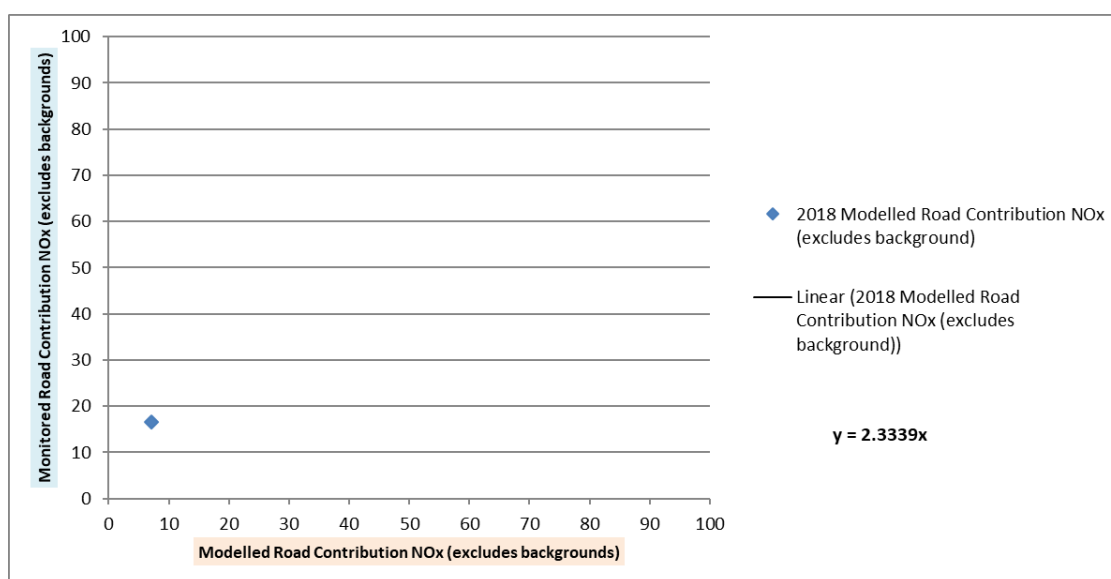
Model Validation and Verification

- C.12 LAQM.TG(16) refers to model validation as *“the general comparison of modelled results against monitoring data carried out by model developers”*. ADMS-Roads is widely accepted by regulatory authorities for use in this type of assessment.
- C.13 Model verification is used to check the performance of the model at a local level. The verification of the ADMS-Roads air dispersion model is achieved by modelling concentration(s) at existing monitoring location(s) in the vicinity of the proposed development, and comparing the modelled concentration(s) with the measured concentration(s).
- C.14 Following review of the 2019 Annual Status Report (ASR) for Maidstone Council, it is understood there is one roadside air quality monitoring location in close proximity to the proposed development site.
- C.15 As no PM₁₀ and PM_{2.5} monitoring location is situated along roads where traffic flow data is available, it has not been possible to carry out model verification for modelled PM₁₀ and PM_{2.5} concentrations.
- C.16 The monitoring data that has been used in the model verification procedure is detailed in Table C3.

Table C3: NO ₂ Monitoring Data Used for Verification Purposes				
Monitoring Location Reference	Type	Approximate Grid Reference		2018 Bias Adjusted NO ₂ Annual Average Concentration (µg/m ³)*
		Easting	Northing	
Maid 75	Roadside Diffusion Tube	586308	152577	23.70

¹² Defra Local Air Quality Management web pages (<http://laqm.defra.gov.uk/tools-monitoring-data/no-calculator.html>)

- C.17 The modelled road-contribution NO_x concentration for the monitors has been compared against the measured road-contribution NO_x concentration for the same locations. The measured concentrations have been derived using the Defra NO_x to NO₂ calculator, taking into account the background NO_x concentration for the local area.
- C.18 The comparison is shown in the below graph. The equation of the trend line is based on linear regression through zero, which provides an overall adjustment factor of 2.3339.



- C.19 This adjustment factor has been applied to the modelled road-contribution NO_x concentrations. The total NO₂ concentrations have been derived by combining the adjusted road-contribution NO_x concentration and background NO₂ concentration, using the Defra NO_x to NO₂ calculator.
- C.20 A final comparison has been made between the total measured NO₂ concentrations and total modelled NO₂ concentrations, as shown in Table C4. Following adjustment, modelled concentrations are within 25% of measured concentrations.

Table C4: Comparison Between Measured and Monitored NO ₂ Concentrations			
Monitoring Location Reference	Measured Total NO ₂ Concentration (µg/m ³)	Modelled Total NO ₂ Concentration (µg/m ³)	Difference (%)
Maid 75	23.70	23.70	0.00

Assessment Criteria

Assessing the Impact of a Proposed Development on Human Receptors

- C.21 Guidance has been prepared by Environmental Protection UK (EPUK) and the IAQM¹³ with relation to the assessment of the air quality impacts of proposed developments and their significance.
- C.22 The impact of a development is usually assessed at specific receptors, and takes into account both the long-term background concentrations, in relation to the relevant Air Quality Assessment Level (AQAL) at these receptors, and the change with the development in place.
- C.23 The impact descriptors for individual receptors are detailed in Table C5.

Table C5: Impact Descriptors for Individual Receptors				
Long Term Average Concentration at Receptor in Assessment Year*	Percentage Change in Concentration Relative to Air Quality Assessment Level (AQAL)*			
	1%	2-5%	6-10%	>10
75% or less of AQAL	Negligible	Negligible	Slight	Moderate
76-94% of AQAL	Negligible	Slight	Moderate	Moderate
95-102% of AQAL	Slight	Moderate	Moderate	Substantial
103-109% of AQAL	Moderate	Moderate	Substantial	Substantial
110% or more of AQAL	Moderate	Substantial	Substantial	Substantial
*Percentage pollutant concentrations have been rounded to whole numbers, to make it easier to assess the impact. Changes of 0% (i.e. less than 0.5% or 0.2µg/m ³) should be described as Negligible				

- C.24 The Kent and Medway Air Quality Planning Guidance also has impact descriptors for individual receptors which are detailed in Table C6.

Table C6: The Kent and Medway Air Quality Planning Guidance Impact Descriptors for Individual Receptors		
Classification of Impact	Concentration Change Due to Development	Or if Development Contribution Causes:
Very High	Increase > 10%	Worsening of air quality within an existing AQMA Creation of a new AQMA Introduction of new receptors within an existing AQMA

¹³ Moorcroft and Barrowcliffe et al, Land-Use Planning and Development Control: Planning for Air Quality (v1.2), January 2017

Table C6: The Kent and Medway Air Quality Planning Guidance Impact Descriptors for Individual Receptors		
Classification of Impact	Concentration Change Due to Development	Or if Development Contribution Causes:
High	Increase > 5 – 10%	Levels to be within 5% AQO
Medium	Increase > 1 < 5%	Levels to be within 10% AQO
Low/Imperceptible	Increase < 1%	-

Determining the Significance of Effects

- C.25 Impacts on air quality, whether adverse or beneficial, will have an effect on human health that can be judged as either 'significant' or 'not significant'.
- C.26 Once the impact of the proposed development has been assessed for the individual impacts, the overall significance is determined using professional judgement. This takes into account a number of factors such as:
- The existing and future air quality in the absence of the development;
 - The extent of the current and future population exposure to the impacts; and
 - The influence and validity of any assumptions adopted when undertaking the prediction of impacts.

Appendix D
Professional Experience of Assessors

Appendix D: Professional Experience of Assessors

- D.1 The assessment of air quality impacts, and the significance of the associated effects, takes into account the professional judgement of the assessor. Details of the experience of the personnel involved with the project are provided below:

Dr Matthew Barnes
BSc (Hons), MSc, PhD

**Senior Environmental
Scientist**

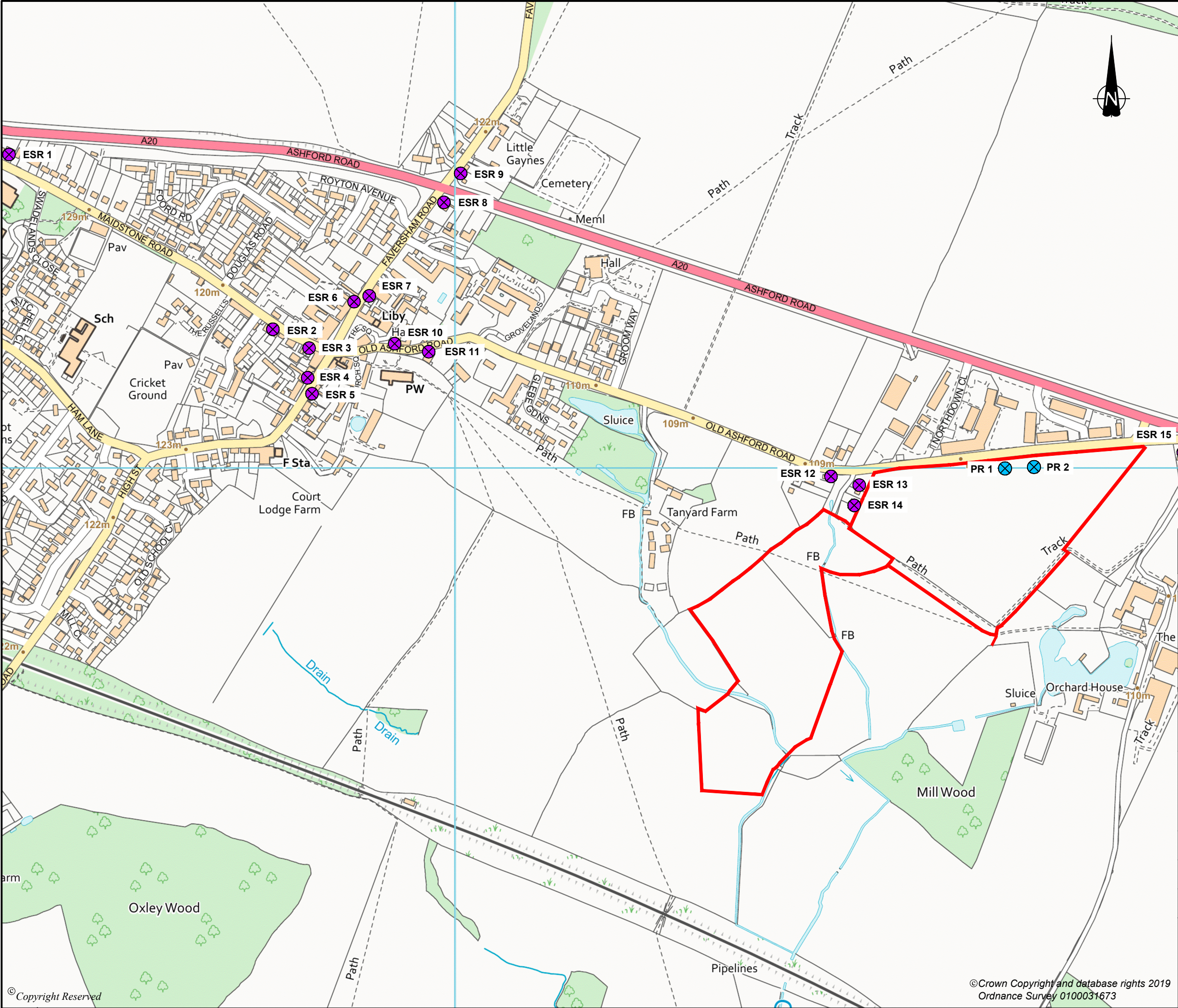
Matthew joined Wardell Armstrong in September 2016 as an Air Quality Scientist, following 18 months working as an air quality technical officer in a local authority. Before that he completed a BSc in Environmental Science, an MSc in Environmental Informatics and a PhD in Atmospheric Science, specialising in modelling urban air pollution. The majority of his work is carried out in support of planning applications and, therefore, he has experience of undertaking air quality assessments for a wide range of projects, small and large, including residential developments, commercial developments and mixed-use developments.

Malcolm Walton
BSc (Env Health) Dip (Acoustics & Noise Control)
MCIEH AMIOA

Technical Director

Malcolm holds a Bachelor of Science degree in Environmental Health and the Diploma in Acoustics and Noise Control. Malcolm is a Member of the Chartered Institute of Environmental Health and an Associate Member of the Institute of Acoustics. Malcolm joined Wardell Armstrong in September 2001 following 12 years working as an Environmental Health Officer in several local authorities, responsible for the enforcement of environmental legislation and in particular air pollution and noise nuisance. Malcolm has experience in the technical co-ordination of environmental appraisal of large schemes to UK and international standards. Malcolm regularly carries out and co-ordinates noise and air quality assessment work associated with planning applications including EIA work and PPC permit application/compliance. He regularly acts as expert witness in planning inquiries in respect of noise, air quality and odour.

Drawing



DO NOT SCALE FROM THIS DRAWING

KEY

SITE BOUNDARY

EXISTING SENSITIVE RECEPTOR LOCATION

PROPOSED RECEPTOR LOCATION

A	First Issue	07-08-19	DR	MB	MW
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REVISION	DETAILS	DATE	DRN	CHKD	APPD
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CLIENT	Dean Lewis Estates Ltd
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PROJECT	Old Ashford Road, Lenham
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DRAWING TITLE	Existing and Proposed Sensitive Receptor Locations
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DRG No.	GM10685-001	REV	A
DRG SIZE	A3	SCALE	1:5000
DATE	31-07-19	APPROVED BY	MW
DRAWN BY	DR	CHECKED BY	MB

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