

Air Quality Appendices: Land off J38 of the M4 Margam

October 2021



Experts in air quality
management & assessment



Document Control

Client	Sandvik Osprey Ltd	Principal Contact	Jemma Shorrock (Boyer Planning)
---------------	--------------------	--------------------------	---------------------------------

Job Number	J10/12218A/10
-------------------	---------------

Report Prepared By:	Jack Buckley
----------------------------	--------------

Document Status and Review Schedule

Report No.	Date	Status	Reviewed by
J10/12218A/10/1 /F1	29 October 2021	Draft	Adam Clegg (Associate Director)

This report has been prepared by Air Quality Consultants Ltd on behalf of the Client, taking into account the agreed scope of works. Unless otherwise agreed, this document and all other Intellectual Property Rights remain the property of Air Quality Consultants Ltd.

In preparing this report, Air Quality Consultants Ltd has exercised all reasonable skill and care, taking into account the objectives and the agreed scope of works. Air Quality Consultants Ltd does not accept any liability in negligence for any matters arising outside of the agreed scope of works. The Company operates a Quality Management System, which is certified to ISO 9001:2015, and an Environmental Management System, certified to ISO 14001:2015.

When issued in electronic format, Air Quality Consultants Ltd does not accept any responsibility for any unauthorised changes made by others.

When printed by Air Quality Consultants Ltd, this report will be on Evolve Office, 100% Recycled paper.



Air Quality Consultants Ltd
23 Coldharbour Road, Bristol BS6 7JT Tel: 0117 974 1086
24 Greville Street, Farringdon, London, EC1N 8SS Tel: 020 3873 4780
aqc@aqconsultants.co.uk

Registered Office: 23 Coldharbour Road, Bristol BS6 7JT
Companies House Registration No: 2814570

Appendices

A1	Glossary.....	3
A2	Construction Dust Assessment Procedure	5
A3	EPUK & IAQM Planning for Air Quality Guidance.....	12
A4	Professional Experience.....	18
A5	Modelling Methodology	19
A6	Construction Mitigation.....	33

A1 Glossary

AADT	Annual Average Daily Traffic
ADMS-Roads	Atmospheric Dispersion Modelling System model for Roads
ADMS-5	Atmospheric Dispersion Modelling System model for point sources
APIS	Air Pollution Information System
AQAL	Air Quality Assessment Level
AQC	Air Quality Consultants
AQMA	Air Quality Management Area
AURN	Automatic Urban and Rural Network
CEMP	Construction Environmental Management Plan
CROW	Countryside and Rights of Way Act
Defra	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DMP	Dust Management Plan
EFT	Emission Factor Toolkit
EPUK	Environmental Protection UK
EU	European Union
EUNIS	European Nature Information System
EV	Electric Vehicle
Exceedance	A period of time when the concentration of a pollutant is greater than the appropriate air quality objective. This applies to specified locations with relevant exposure
HDV	Heavy Duty Vehicles (> 3.5 tonnes)
HGV	Heavy Goods Vehicle
HMSO	Her Majesty's Stationery Office
IAQM	Institute of Air Quality Management
JAQU	Joint Air Quality Unit
kph	Kilometres Per hour
LAQM	Local Air Quality Management

LDV	Light Duty Vehicles (<3.5 tonnes)
LGV	Light Goods Vehicle
µg/m³	Microgrammes per cubic metre
MCPD	Medium Combustion Plant Directive
NAEI	National Atmospheric Emissions Inventory
NO	Nitric oxide
NO₂	Nitrogen dioxide
NO_x	Nitrogen oxides (taken to be NO ₂ + NO)
NPPF	National Planning Policy Framework
NRMM	Non-road Mobile Machinery
Objectives	A nationally defined set of health-based concentrations for nine pollutants, seven of which are incorporated in Regulations, setting out the extent to which the standards should be achieved by a defined date. There are also vegetation-based objectives for sulphur dioxide and nitrogen oxides
OLEV	Office for Low Emission Vehicles
PC	Process Contribution
PEC	Predicted Environmental Concentration
PM₁₀	Small airborne particles, more specifically particulate matter less than 10 micrometres in aerodynamic diameter
PM_{2.5}	Small airborne particles less than 2.5 micrometres in aerodynamic diameter
PPG	Planning Practice Guidance
PPW	Planning Policy Wales
RDE	Real Driving Emissions
SAC	Special Area of Conservation
SPG	Supplementary Planning Guidance
SSSI	Site of Special Scientific Interest
Standards	A nationally defined set of concentrations for nine pollutants below which health effects do not occur or are minimal
TAN	Technical Advice Note
TEA	Triethanolamine – used to absorb nitrogen dioxide

A2 Construction Dust Assessment Procedure

A2.1 The criteria developed by IAQM (2016) divide the activities on construction sites into four types to reflect their different potential impacts. These are:

- demolition;
- earthworks;
- construction; and
- trackout.

A2.2 The assessment procedure includes the four steps summarised below:

STEP 1: Screen the Need for a Detailed Assessment

A2.3 An assessment is required where there is a human receptor within 350 m of the boundary of the site and/or within 50 m of the route(s) used by construction vehicles on the public highway, up to 500 m from the site entrance(s), or where there is an ecological receptor within 50 m of the boundary of the site and/or within 50 m of the route(s) used by construction vehicles on the public highway, up to 500 m from the site entrance(s).

A2.4 Where the need for a more detailed assessment is screened out, it can be concluded that the level of risk is *negligible* and that any effects will be ‘not significant’. No mitigation measures beyond those required by legislation will be required.

STEP 2: Assess the Risk of Dust Impacts

A2.5 A site is allocated to a risk category based on two factors:

- the scale and nature of the works, which determines the potential dust emission magnitude (Step 2A); and
- the sensitivity of the area to dust effects (Step 2B).

A2.6 These two factors are combined in Step 2C, which is to determine the risk of dust impacts with no mitigation applied. The risk categories assigned to the site may be different for each of the four potential sources of dust (demolition, earthworks, construction and trackout).

Step 2A – Define the Potential Dust Emission Magnitude

A2.7 Dust emission magnitude is defined as either ‘Small’, ‘Medium’, or ‘Large’. The IAQM guidance explains that this classification should be based on professional judgement, but provides the examples in Table A2.1.

Table A2.1: Examples of How the Dust Emission Magnitude Class May be Defined

Class	Examples
Demolition	
Large	Total building volume >50,000 m ³ , potentially dusty construction material (e.g. concrete), on site crushing and screening, demolition activities >20 m above ground level
Medium	Total building volume 20,000 m ³ – 50,000 m ³ , potentially dusty construction material, demolition activities 10-20 m above ground level
Small	Total building volume <20,000 m ³ , construction material with low potential for dust release (e.g. metal cladding or timber), demolition activities <10 m above ground, demolition during wetter months
Earthworks	
Large	Total site area >10,000 m ² , potentially dusty soil type (e.g. clay, which will be prone to suspension when dry to due small particle size), >10 heavy earth moving vehicles active at any one time, formation of bunds >8 m in height, total material moved >100,000 tonnes
Medium	Total site area 2,500 m ² – 10,000 m ² , moderately dusty soil type (e.g. silt), 5-10 heavy earth moving vehicles active at any one time, formation of bunds 4 m – 8 m in height, total material moved 20,000 tonnes – 100,000 tonnes
Small	Total site area <2,500 m ² , soil type with large grain size (e.g. sand), <5 heavy earth moving vehicles active at any one time, formation of bunds <4 m in height, total material moved <10,000 tonnes, earthworks during wetter months
Construction	
Large	Total building volume >100,000 m ³ , piling, on site concrete batching; sandblasting
Medium	Total building volume 25,000 m ³ – 100,000 m ³ , potentially dusty construction material (e.g. concrete), piling, on site concrete batching
Small	Total building volume <25,000 m ³ , construction material with low potential for dust release (e.g. metal cladding or timber)
Trackout ^a	
Large	>50 HDV (>3.5t) outward movements in any one day, potentially dusty surface material (e.g. high clay content), unpaved road length >100 m
Medium	10-50 HDV (>3.5t) outward movements in any one day, moderately dusty surface material (e.g. high clay content), unpaved road length 50 m – 100 m
Small	<10 HDV (>3.5t) outward movements in any one day, surface material with low potential for dust release, unpaved road length <50 m

^a These numbers are for vehicles that leave the site after moving over unpaved ground.

Step 2B – Define the Sensitivity of the Area

A2.8 The sensitivity of the area is defined taking account of a number of factors:

- the specific sensitivities of receptors in the area;
- the proximity and number of those receptors;
- in the case of PM₁₀, the local background concentration; and
- site-specific factors, such as whether there are natural shelters to reduce the risk of wind-blown dust.

- A2.9 The first requirement is to determine the specific sensitivities of local receptors. The IAQM guidance recommends that this should be based on professional judgment, taking account of the principles in Table A2.2. These receptor sensitivities are then used in the matrices set out in Table A2.3, Table A2.4 and Table A2.5 to determine the sensitivity of the area. Finally, the sensitivity of the area is considered in relation to any other site-specific factors, such as the presence of natural shelters etc., and any required adjustments to the defined sensitivities are made.

Step 2C – Define the Risk of Impacts

- A2.10 The dust emission magnitude determined at Step 2A is combined with the sensitivity of the area determined at Step 2B to determine the *risk* of impacts with no mitigation applied. The IAQM guidance provides the matrix in Table A2.6 as a method of assigning the level of risk for each activity.

STEP 3: Determine Site-specific Mitigation Requirements

- A2.11 The IAQM guidance provides a suite of recommended and desirable mitigation measures which are organised according to whether the outcome of Step 2 indicates a low, medium, or high risk. The list provided in the IAQM guidance has been used as the basis for the requirements set out in Appendix A6.

STEP 4: Determine Significant Effects

- A2.12 The IAQM guidance does not provide a method for assessing the significance of effects before mitigation, and advises that pre-mitigation significance should not be determined. With appropriate mitigation in place, the IAQM guidance is clear that the residual effect will normally be 'not significant'.
- A2.13 The IAQM guidance recognises that, even with a rigorous dust management plan in place, it is not possible to guarantee that the dust mitigation measures will be effective all of the time, for instance under adverse weather conditions. The local community may therefore experience occasional, short-term dust annoyance. The scale of this would not normally be considered sufficient to change the conclusion that the effects will be 'not significant'.

Table A2.2: Principles to be Used When Defining Receptor Sensitivities

Class	Principles	Examples
Sensitivities of People to Dust Soiling Effects		
High	users can reasonably expect enjoyment of a high level of amenity; or the appearance, aesthetics or value of their property would be diminished by soiling; and the people or property would reasonably be expected to be present continuously, or at least regularly for extended periods, as part of the normal pattern of use of the land	dwellings, museum and other culturally important collections, medium and long term car parks and car showrooms
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; or the appearance, aesthetics or value of their property could be diminished by soiling; or the people or property wouldn't reasonably be expected to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land	parks and places of work
Low	the enjoyment of amenity would not reasonably be expected; or there is property that would not reasonably be expected to be diminished in appearance, aesthetics or value by soiling; or there is transient exposure, where the people or property would reasonably be expected to be present only for limited periods of time as part of the normal pattern of use of the land	playing fields, farmland (unless commercially-sensitive horticultural), footpaths, short term car parks and roads
Sensitivities of People to the Health Effects of PM₁₀		
High	locations where members of the public may be exposed for eight hours or more in a day	residential properties, hospitals, schools and residential care homes
Medium	locations where the people exposed are workers, and where individuals may be exposed for eight hours or more in a day.	may include office and shop workers, but will generally not include workers occupationally exposed to PM ₁₀
Low	locations where human exposure is transient	public footpaths, playing fields, parks and shopping streets
Sensitivities of Receptors to Ecological Effects		
High	locations with an international or national designation and the designated features may be affected by dust soiling; or locations where there is a community of a particularly dust sensitive species	Special Areas of Conservation with dust sensitive features
Medium	locations where there is a particularly important plant species, where its dust sensitivity is uncertain or unknown; or locations with a national designation where the features may be affected by dust deposition	Sites of Special Scientific Interest with dust sensitive features
Low	locations with a local designation where the features may be affected by dust deposition	Local Nature Reserves with dust sensitive features

Table A2.3: Sensitivity of the Area to Dust Soiling Effects on People and Property ¹

Receptor Sensitivity	Number of Receptors	Distance from the Source (m)			
		<20	<50	<100	<350
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

¹ For demolition, earthworks and construction, distances are taken either from the dust source or from the boundary of the site. For trackout, distances are measured from the sides of roads used by construction traffic. Without mitigation, trackout may occur from roads up to 500 m from sites with a *large* dust emission magnitude for trackout, 200 m from sites with a *medium* dust emission magnitude and 50 m from sites with a *small* dust emission magnitude, as measured from the site exit. The impact declines with distance from the site, and it is only necessary to consider trackout impacts up to 50 m from the edge of the road.

Table A2.4: Sensitivity of the Area to Human Health Effects ¹

Receptor Sensitivity	Annual Mean PM ₁₀	Number of Receptors	Distance from the Source (m)				
			<20	<50	<100	<200	<350
High	>32 µg/m ³	>100	High	High	High	Medium	Low
		10-100	High	High	Medium	Low	Low
		1-10	High	Medium	Low	Low	Low
	28-32 µg/m ³	>100	High	High	Medium	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	High	Medium	Low	Low	Low
	24-28 µg/m ³	>100	High	Medium	Low	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	<24 µg/m ³	>100	Medium	Low	Low	Low	Low
		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Medium	>32 µg/m ³	>10	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	28-32 µg/m ³	>10	Medium	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	24-28 µg/m ³	>10	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	<24 µg/m ³	>10	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Low	-	>1	Low	Low	Low	Low	Low

Table A2.5: Sensitivity of the Area to Ecological Effects ¹

Receptor Sensitivity	Distance from the Source (m)	
	<20	<50
High	High	Medium
Medium	Medium	Low
Low	Low	Low

Table A2.6: Defining the Risk of Dust Impacts

Sensitivity of the Area	Dust Emission Magnitude		
	Large	Medium	Small
Demolition			
High	High Risk	Medium Risk	Medium Risk
Medium	High Risk	Medium Risk	Low Risk
Low	Medium Risk	Low Risk	Negligible
Earthworks			
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible
Construction			
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible
Trackout			
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Low Risk	Negligible
Low	Low Risk	Low Risk	Negligible

A3 EPUK & IAQM Planning for Air Quality Guidance

- A3.1 The guidance issued by EPUK and IAQM (Moorcroft and Barrowcliffe et al, 2017) is comprehensive in its explanation of the place of air quality in the planning regime. Key sections of the guidance not already mentioned above are set out below.

Air Quality as a Material Consideration

“Any air quality issue that relates to land use and its development is capable of being a material planning consideration. The weight, however, given to air quality in making a planning application decision, in addition to the policies in the local plan, will depend on such factors as:

- *the severity of the impacts on air quality;*
- *the air quality in the area surrounding the proposed development;*
- *the likely use of the development, i.e. the length of time people are likely to be exposed at that location; and*
- *the positive benefits provided through other material considerations”.*

Recommended Best Practice

- A3.2 The guidance goes into detail on how all development proposals can and should adopt good design principles that reduce emissions and contribute to better air quality management. It states:

“The basic concept is that good practice to reduce emissions and exposure is incorporated into all developments at the outset, at a scale commensurate with the emissions”.

- A3.3 The guidance sets out a number of good practice principles that should be applied to all developments that:

- include 10 or more dwellings;
- where the number of dwellings is not known, residential development is carried out on a site of more than 0.5 ha;
- provide more than 1,000 m² of commercial floorspace;
- are carried out on land of 1 ha or more.

- A3.4 The good practice principles are that:

- New developments should not contravene the Council's Air Quality Action Plan, or render any of the measures unworkable;
- Wherever possible, new developments should not create a new “street canyon”, as this inhibits pollution dispersion;

- Delivering sustainable development should be the key theme of any application;
- New development should be designed to minimise public exposure to pollution sources, e.g. by locating habitable rooms away from busy roads;
- The provision of at least 1 Electric Vehicle (EV) “rapid charge” point per 10 residential dwellings and/or 1000 m² of commercial floorspace. Where on-site parking is provided for residential dwellings, EV charging points for each parking space should be made available;
- Where development generates significant additional traffic, provision of a detailed travel plan (with provision to measure its implementation and effect) which sets out measures to encourage sustainable means of transport (public, cycling and walking) via subsidised or free-ticketing, improved links to bus stops, improved infrastructure and layouts to improve accessibility and safety;
- All gas-fired boilers to meet a minimum standard of <40 mgNO_x/kWh;
- Where emissions are likely to impact on an AQMA, all gas-fired CHP plant to meet a minimum emissions standard of:
 - Spark ignition engine: 250 mgNO_x/Nm³;
 - Compression ignition engine: 400 mgNO_x/Nm³;
 - Gas turbine: 50 mgNO_x/Nm³.
- A presumption should be to use natural gas-fired installations. Where biomass is proposed within an urban area it is to meet minimum emissions standards of 275 mgNO_x/Nm³ and 25 mgPM/Nm³.

A3.5 The guidance also outlines that offsetting emissions might be used as a mitigation measure for a proposed development. However, it states that:

“It is important that obligations to include offsetting are proportional to the nature and scale of development proposed and the level of concern about air quality; such offsetting can be based on a quantification of the emissions associated with the development. These emissions can be assigned a value, based on the “damage cost approach” used by Defra, and then applied as an indicator of the level of offsetting required, or as a financial obligation on the developer. Unless some form of benchmarking is applied, it is impractical to include building emissions in this approach, but if the boiler and CHP emissions are consistent with the standards as described above then this is not essential”.

A3.6 The guidance offers a widely used approach for quantifying costs associated with pollutant emissions from transport. It also outlines the following typical measures that may be considered to offset emissions, stating that measures to offset emissions may also be applied as post assessment mitigation:

- Support and promotion of car clubs;
- Contributions to low emission vehicle refuelling infrastructure;
- Provision of incentives for the uptake of low emission vehicles;
- Financial support to low emission public transport options; and
- Improvements to cycling and walking infrastructures.

Screening

Impacts of the Local Area on the Development

“There may be a requirement to carry out an air quality assessment for the impacts of the local area’s emissions on the proposed development itself, to assess the exposure that residents or users might experience. This will need to be a matter of judgement and should take into account:

- the background and future baseline air quality and whether this will be likely to approach or exceed the values set by air quality objectives;*
- the presence and location of Air Quality Management Areas as an indicator of local hotspots where the air quality objectives may be exceeded;*
- the presence of a heavily trafficked road, with emissions that could give rise to sufficiently high concentrations of pollutants (in particular nitrogen dioxide), that would cause unacceptably high exposure for users of the new development; and*
- the presence of a source of odour and/or dust that may affect amenity for future occupants of the development”.*

Impacts of the Development on the Local Area

A3.7 The guidance sets out two stages of screening criteria that can be used to identify whether a detailed air quality assessment is required, in terms of the impact of the development on the local area. The first stage is that you should proceed to the second stage if any of the following apply:

- 10 or more residential units or a site area of more than 0.5 ha residential use; and/or
- more than 1,000 m² of floor space for all other uses or a site area greater than 1 ha.

A3.8 Coupled with any of the following:

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

A3.9 If the above do not apply then the development can be screened out as not requiring a detailed air quality assessment of the impact of the development on the local area. If they do apply then you proceed to stage 2, which sets out indicative criteria for requiring an air quality assessment. The stage 2 criteria relating to vehicle emissions are set out below:

- the development will lead to a change in LDV flows of more than 100 AADT within or adjacent to an AQMA or more than 500 AADT elsewhere;
- the development will lead to a change in HDV flows of more than 25 AADT within or adjacent to an AQMA or more than 100 AADT elsewhere;
- the development will lead to a realigning of 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;
- the development will introduce a new junction or remove an existing junction near to relevant receptors, and the junction will cause traffic to significantly change vehicle acceleration/deceleration, e.g. traffic lights or roundabouts;
- the development will introduce or change a bus station where bus flows will change by more than 25 AADT within or adjacent to an AQMA or more than 100 AADT elsewhere; and
- the development will have an underground car park with more than 100 movements per day (total in and out) with an extraction system that exhausts within 20 m of a relevant receptor.

A3.10 The criteria are more stringent where the traffic impacts may arise on roads where concentrations are close to the objective. The presence of an AQMA is taken to indicate the possibility of being close to the objective, but where whole authority AQMAs are present and it is known that the affected roads have concentrations below 90% of the objective, the less stringent criteria are likely to be more appropriate.

A3.11 On combustion processes (including standby emergency generators and shipping) where there is a risk of impacts at relevant receptors, the guidance states that:

“Typically, any combustion plant where the single or combined NO_x emission rate is less than 5 mg/sec is unlikely to give rise to impacts, provided that the emissions are released from a vent or stack in a location and at a height that provides adequate dispersion. As a guide, the 5 mg/s criterion equates to a 450 kW ultra-low NO_x gas boiler or a 30kW CHP unit operating at <95mg/Nm³.

In situations where the emissions are released close to buildings with relevant receptors, or where the dispersion of the plume may be adversely affected by the size and/or height of adjacent buildings (including situations where the stack height is lower than the receptor) then consideration will need to be given to potential impacts at much lower emission rates.

Conversely, where existing nitrogen dioxide concentrations are low, and where the dispersion conditions are favourable, a much higher emission rate may be acceptable”.

- A3.12 Should none of the above apply then the development can be screened out as not requiring a detailed air quality assessment of the impact of the development on the local area, provided that professional judgement is applied; the guidance importantly states the following:

“The criteria provided are precautionary and should be treated as indicative. They are intended to function as a sensitive ‘trigger’ for initiating an assessment in cases where there is a possibility of significant effects arising on local air quality. This possibility will, self-evidently, not be realised in many cases. The criteria should not be applied rigidly; in some instances, it may be appropriate to amend them on the basis of professional judgement, bearing in mind that the objective is to identify situations where there is a possibility of a significant effect on local air quality”.

- A3.13 Even if a development cannot be screened out, the guidance is clear that a detailed assessment is not necessarily required:

“The use of a Simple Assessment may be appropriate, where it will clearly suffice for the purposes of reaching a conclusion on the significance of effects on local air quality. The principle underlying this guidance is that any assessment should provide enough evidence that will lead to a sound conclusion on the presence, or otherwise, of a significant effect on local air quality. A Simple Assessment will be appropriate, if it can provide this evidence. Similarly, it may be possible to conduct a quantitative assessment that does not require the use of a dispersion model run on a computer”.

- A3.14 The guidance also outlines what the content of the air quality assessment should include, and this has been adhered to in the production of this chapter.

Assessment of Significance

- A3.15 There is no official guidance in the UK in relation to development control on how to describe the nature of air quality impacts, nor how to assess their significance. The approach within the EPUK/IAQM guidance has, therefore, been used in this assessment. This approach involves a two stage process:

- a qualitative or quantitative description of the impacts on local air quality arising from the development; and
- a judgement on the overall significance of the effects of any impacts.

- A3.16 The guidance recommends that the assessment of significance should be based on professional judgement, with the overall air quality impact of the development described as either ‘significant’ or ‘not significant’. In drawing this conclusion, the following factors should be taken into account:

- the existing and future air quality in the absence of the development;
- the extent of current and future population exposure to the impacts;
- the influence and validity of any assumptions adopted when undertaking the prediction of impacts;
- the potential for cumulative impacts and, in such circumstances, several impacts that are described as '*slight*' individually could, taken together, be regarded as having a significant effect for the purposes of air quality management in an area, especially where it is proving difficult to reduce concentrations of a pollutant. Conversely, a '*moderate*' or '*substantial*' impact may not have a significant effect if it is confined to a very small area and where it is not obviously the cause of harm to human health; and
- the judgement on significance relates to the consequences of the impacts; will they have an effect on human health that could be considered as significant? In the majority of cases, the impacts from an individual development will be insufficiently large to result in measurable changes in health outcomes that could be regarded as significant by health care professionals.

A3.17 The guidance is clear that other factors may be relevant in individual cases. It also states that the effect on the residents of any new development where the air quality is such that an air quality objective is not met will be judged as significant. For people working at new developments in this situation, the same will not be true as occupational exposure standards are different, although any assessment may wish to draw attention to the undesirability of the exposure.

A3.18 A judgement of the significance should be made by a competent professional who is suitably qualified. A summary of the professional experience of the staff contributing to this assessment is provided in Appendix A4.

A4 Professional Experience

Adam Clegg, BSc (Hons) MEnvSc MIAQM

Mr Clegg is an Associate Director with AQC, with over sixteen years' experience, specialising in industrial emissions. He is a member of the Institute of Air Quality Management, has previously contributed his time to, and authored publications on behalf of, the Energy Institute's Emissions Working Group, and has acted as peer reviewer for the Journal of Air & Waste Management. His expertise includes ambient and stack emissions monitoring, emission inventory development and reporting, atmospheric dispersion modelling, abatement of air emissions, environmental permitting, Best Available Technique (BAT) assessments, cost-benefit analysis and compliance assessment. He has extensive experience in the quantification and assessment of emissions from a variety of releases, covering point source emissions, flare emissions, fugitive emissions and emissions from mobile transport sources, including marine vessels, on-road and off-road vehicles and rail locomotives. He has detailed knowledge of the technologies and techniques to reduce concentrations of combustion and non-combustion related pollutants, including oxides of nitrogen, acid gases (e.g., SO₂, HF, HCl), volatile organic compounds (VOCs), particulates, heavy metals and odour.

Jack Buckley, BSc (Hons) MSc AMEnvSc AMIAQM

Mr Buckley is a Consultant with AQC with four years' experience in the field of air quality. Prior to joining AQC in June 2019, he worked as a Consultant at Capita, where he gained experience in the assessment of air quality impacts for a range of projects, including road and rail infrastructure schemes, residential developments and industrial facilities sizes. He has experience in producing air quality assessments for EIA schemes, using qualitative and quantitative methods, including ADMS-Roads and air quality neutral calculations, and has undertaken diffusion tube monitoring studies. Prior to joining Capita, Jack completed a BSc (Hons) in Chemistry and an MSc in Environmental Science and Management, with both dissertations investigating the performance of low-cost air quality sensors. He is an Associate Member of both the Institute of Air Quality Management and the Institution of Environmental Sciences.

A5 Modelling Methodology

Road Traffic

Model Inputs

- A5.1 Predictions have been carried out using the ADMS-Roads dispersion model (v5). The model requires the user to provide various input data, including emissions from each section of road and the road characteristics (including road width, where applicable). Vehicle emissions have been calculated based on vehicle flow, composition and speed data using the EFT (Version 10.1) published by Defra (2021b). Model input parameters are summarised in Table A5.1 and, where considered necessary, discussed further below.

Table A5.1: Summary of Model Inputs

Model Parameter	Value Used
Terrain Effects Modelled?	Yes – 12km x 12km Cartesian grid at 50m resolution
Variable Surface Roughness File Used?	Yes – 12km x 12km Cartesian grid at 50m resolution
Urban Canopy Flow Used?	No
Advanced Street Canyons Modelled?	No
Meteorological Monitoring Site	Mumbles Head
Meteorological Data Year	2019
Dispersion Site Surface Roughness Length (m)	N/A (variable surface roughness file used)
Dispersion Site Minimum MO Length (m)	10
Met Site Surface Roughness Length (m)	0.3
Met Site Minimum MO Length (m)	1
Gradients?	No

- A5.2 AADT flows, diurnal flow profiles, speeds, and vehicle fleet composition data have been provided by Apex Transport Planning Ltd, who have undertaken the transport assessment work for the proposed development. Traffic speeds have been estimated based on professional judgement, taking account of the road layout, speed limits and the proximity to a junction. The traffic data used in this assessment are summarised in Table A5.2. Diurnal and monthly flow profiles for the traffic have been derived from the national profiles published by DfT (2020).

Table A5.2: Summary of Traffic Data used in the Assessment (AADT Flows)

Road Link	2019		2024 (Without Scheme)		2024 (With Scheme)	
	AADT	%HDV	AADT	%HDV	AADT	%HDV
M4 South of J38	72278	7.8%	75689	7.8%	76053	7.8%
A48 between J38 and Site Access	16337	6.1%	17108	6.1%	17762	6.0%
A48 between Site Access and M4 N Slip Road	8352	4.0%	8746	4.0%	9086	3.9%
M4 N Slip Road	3901	3.8%	4085	3.8%	4377	3.6%
A48 north of M4 N Slip Road (Margam Road)	8034	2.2%	8413	2.2%	8461	2.2%
M4 north of M4 N Slip Road	69205	7.1%	72471	7.1%	73053	7.0%
Harbour Way	9830	7.0%	10294	7.1%	10437	7.0%
Site Access	0	0.0%	0	0.0%	1137	1.8%
M4 between J38 and NB slip road	72278	7.8%	75689	7.8%	76826	7.8%

A5.3 Figure A5.1 shows the road network included within the model, along with the speed at which each link was modelled.

**Figure A5.1: Modelled Road Network & Speed**

Imagery ©2021 Google, Imagery ©2021 Bluesky, Infoterra Ltd & COWI A/S, Getmapping plc, Maxar Technologies, The GeoInformation Group, Map data ©2021.

A5.4 Hourly sequential meteorological data in sectors of 10 degrees from Mumbles Head for 2019 have been used in the model. The meteorological monitoring station is located at Mumbles Head, approximately 16 km to the west of the proposed development. It is deemed to be the nearest monitoring station representative of meteorological conditions in the vicinity of the proposed development; both the application site and the meteorological monitoring station are located at near-coastal locations on the south coast of Wales where they will be influenced by the effects of coastal meteorology. A wind rose for the site for the year 2019 is provided in Figure A5.2. The station is operated by the UK Met Office. Raw data were provided by the Met Office and processed by AQC for use in ADMS.

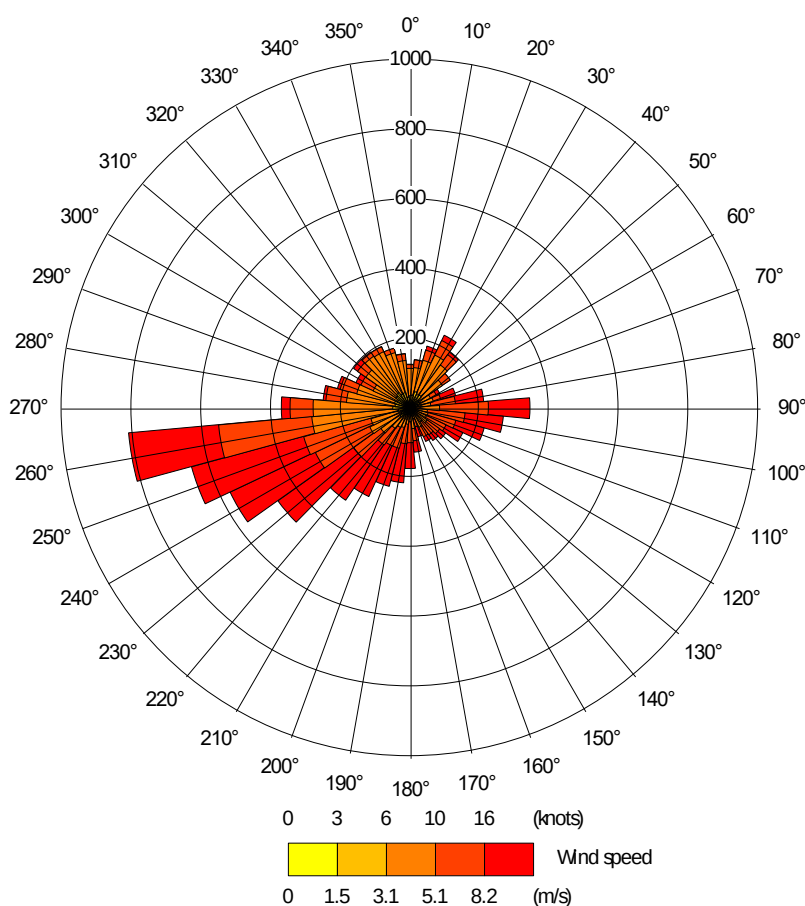


Figure A5.2: Wind Rose

Model Verification

A5.5 In order to ensure that ADMS-Roads accurately predicts local concentrations, it is necessary to verify the model against local measurements.

- A5.6 Within the study area there are no local air quality monitoring site representative of the application site against which to verify the model. Experience of carrying out a large number of air quality assessments in similar settings is that ADMS-Roads, when using emissions taken from Defra's EFT, tends to under-predict concentrations. The results thus require uplifting. The model results have therefore been adjusted using an average factor derived from a number of recent road traffic assessments undertaken by AQC for similar settings and using the same model and EFT. An adjustment factor of **2.344** has thus been applied to the raw NO_x model outputs.
- A5.7 The approach described above for NO_x and nitrogen dioxide determines the road increment of concentrations by subtracting the predicted local background from the roadside measurements. This works well for NO_x because the differences between roadside and background concentrations typically represent a large proportion of the total measured value. The same is not true for PM₁₀ and PM_{2.5} concentrations, which are dominated by non-road emissions, even at the roadside. In practice, the influence of a local road on concentrations can often be smaller than the uncertainty in the mapped background concentration. As an example of this, 31% of all roadside and kerbside sites in London which measured PM_{2.5} in 2019 with >75% data capture, recorded an annual mean concentration lower than the equivalent Defra mapped background value. Using measured background concentrations does not provide any significant benefit, owing largely to the spatial resolution of available measurements, but also because of measurement uncertainty. For example, hourly-mean PM_{2.5} concentrations measured at roadside sites are often lower than those measured at nearby urban background sites, while concentrations at urban background sites are often lower than those measured at rural sites.
- A5.8 For these reasons, it is not appropriate to calculate the annual mean road-increment to PM₁₀ and PM_{2.5} concentrations by subtracting either the mapped background or a local measured background concentration. This, in turn, means that the approach to model adjustment which is described for NO_x and NO₂ is not appropriate for PM₁₀ and PM_{2.5}. Historically, many studies have derived a model adjustment factor for NO_x and applied this to PM₁₀ and PM_{2.5}. This is also not appropriate, since there is no reason to expect the same bias in emissions of NO_x, PM₁₀ and PM_{2.5}.
- A5.9 While there is very strong evidence that EFT-based models have consistently under-predicted road-NO_x concentrations in urban areas, there is no equivalent evidence for PM₁₀ and PM_{2.5}. There is currently no strong basis for applying any adjustment to the model outputs. Predicted concentrations of PM₁₀ and PM_{2.5} have thus not been adjusted.

Post-processing

- A5.10 The model predicts road-NO_x concentrations at each receptor location. These concentrations have been adjusted using the adjustment factor set out above, which, along with the background NO₂, has been processed through the NO_x to NO₂ calculator available on the Defra LAQM Support website (Defra, 2021b). The traffic mix within the calculator has been set to "All other urban UK

traffic”, which is considered suitable for the study area. The calculator predicts the component of NO₂ based on the adjusted road-NO_x and the background NO₂.

Point Sources

Model Inputs

A5.11 The impacts of emissions from the proposed Powder Processing Plant have been predicted using the ADMS-5 (version 5.2) dispersion model. ADMS-5 is a new generation model that incorporates a state-of-the-art understanding of the dispersion processes within the atmospheric boundary layer. The model has been run to predict the contribution of the proposed process (POW), classification (CLAS) and scrubber (SCRUB) emissions to annual and hourly mean concentrations and deposition rates of PM, chromium, nickel, copper, cobalt and lead. Model input selections are summarised in Table A5.3, and, where considered necessary, discussed further below. Input emission parameters are presented in Table A5.4.

Table A5.3: Summary of Model Inputs

Model Parameter	Value Used
Terrain Effects Modelled?	Yes – 12km x 12km Cartesian grid at 50m resolution
Variable Surface Roughness File Used?	Yes – 12km x 12km Cartesian grid at 50m resolution
Urban Canopy Flow Used?	No
Building Downwash Effects Modelled?	Yes
Meteorological Monitoring Site	Mumbles Head
Meteorological Data Years	2016 - 2020
Dispersion Site Surface Roughness Length (m)	N/A (variable surface roughness file used)
Dispersion Site Minimum MO Length (m)	10
Met Site Surface Roughness Length (m)	0.3
Met Site Surface Minimum MO Length (m)	1

A5.12 Emissions data for the POW, CLAS and SCRUB stacks have been provided by Sandvik Osprey and are based on monitoring data for another similar facility, although it is acknowledged that using these emission rates are likely to assess a worst-case scenario as more modern abatement technology will be installed at the Proposed Development.

A5.13 Emissions from all plant will discharge at, or just above, roof level in dedicated flues. The exhaust emission parameters have been calculated based on the provided pollutant emission rates, flue diameters and volumetric flow rates, and are presented in Table A5.4.

Table A5.4: Plant Specifications, Modelled Emissions and Release Conditions

Parameter	Value
13x POW Stacks	
Specified Flue Internal Diameter (m)	0.45
Calculated Exit Velocity (m/s)	28.1
Calculated PM Emission Rate (g/s)	0.011
Calculated Chromium Emission Rate (g/s)	0.002
Calculated Nickel Emission Rate (g/s)	0.0000667
Calculated Copper Emission Rate (g/s)	0.0036
Calculated Cobalt Emission Rate (g/s)	0.001
Calculated Lead Emission Rate (g/s)	0.0001
Specified Exhaust Temperature (°C)	93
Flue Location (x,y)	279175, 186234 279176, 186222 279175, 186230 279176, 186218 279178, 186210 279178, 186206 279179, 186198 279179, 186193 279180, 186184 279181, 186173 279182, 186169 279183, 186160 279181, 186181
14x Classification Stacks	
Specified Flue Internal Diameter (m)	0.35
Calculated Exit Velocity (m/s)	4.6
Calculated PM Emission Rate (g/s)	0.000275
Calculated Chromium Emission Rate (g/s)	0.000021
Calculated Nickel Emission Rate (g/s)	0.00001875
Calculated Copper Emission Rate (g/s)	0.000004
Calculated Cobalt Emission Rate (g/s)	0.000004
Calculated Lead Emission Rate (g/s)	0.000021
Specified Exhaust Temperature (°C)	Ambient

Flue Locations (x,y)	279217, 186212
	279227, 186212
	279218, 186204
	279228, 186204
	279219, 186195
	279229, 186197
	279220, 186187
	279230, 186189
	279220, 186180
	279230, 186181
	279221, 186172
	279231, 186173
	279228, 186157
	279229, 186147
1x Scrubber Stack	
Specified Flue Internal Diameter (m)	0.25
Calculated Exit Velocity (m/s)	5.8
Calculated PM Emission Rate (g/s)	0.001
Calculated Chromium Emission Rate (g/s)	0.0000029
Calculated Nickel Emission Rate (g/s)	0.00000057
Calculated Copper Emission Rate (g/s)	0.0000029
Calculated Cobalt Emission Rate (g/s)	0.0000029
Calculated Lead Emission Rate (g/s)	0.0000029
Specified Exhaust Temperature (°C)	27
Flue Location (x,y)	279183, 186156

A5.14 Entrainment of the plume into the wake of the buildings (the so-called building downwash effect) has been taken into account in the model. The building dimensions and flue location have been obtained from drawings provided by James and Nicholas Limited. The locations of the flues are shown in Figure A5.3 along with the modelled buildings. Building heights are presented in Table A5.5.

Table A5.5: Modelled Building Dimensions

Building	Height (m)	Length / Diameter (m)	Width (m)	Rotation (°)
Main Building (left)	16.5	135.1	60.3	173.7
Main Building and Stage 2 (right)	16.5	60.0	134.3	174.0

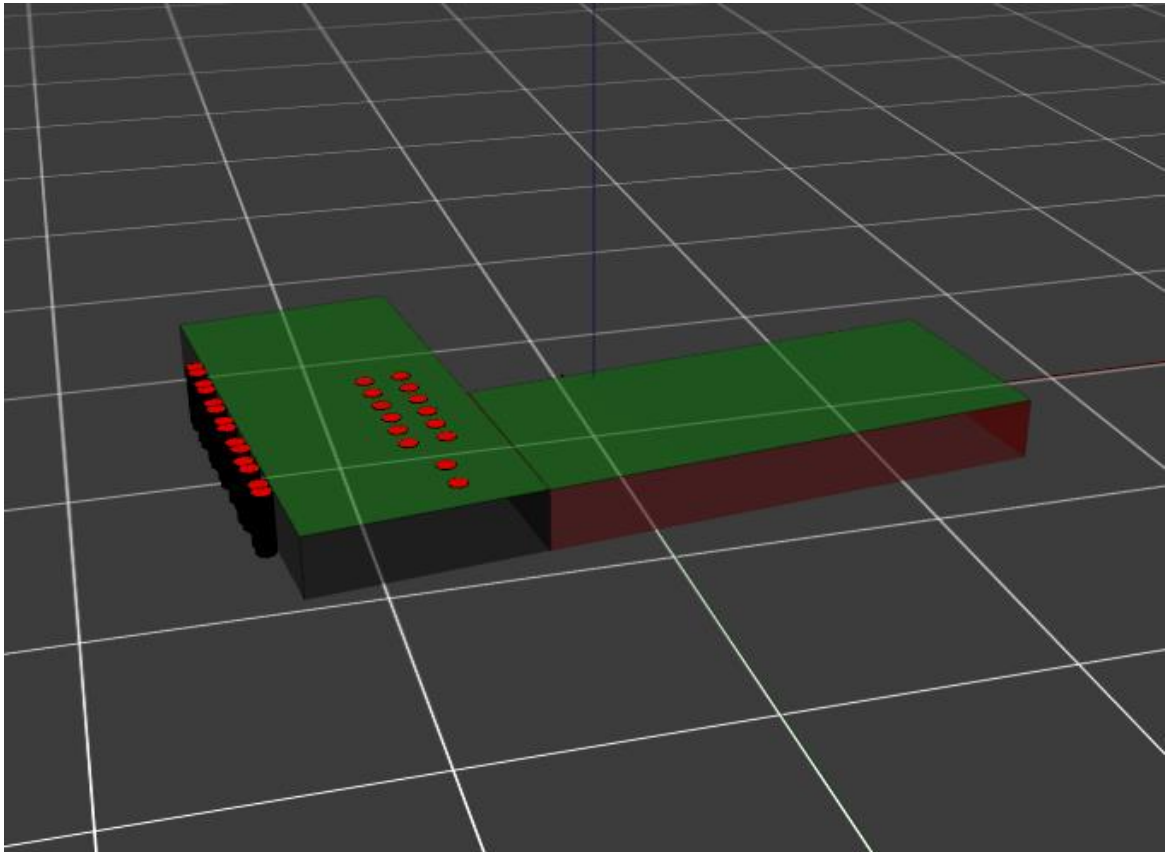


Figure A5.3: Flue Location & Modelled Buildings

Contains Ordnance Survey data © Crown copyright and database right 2021. Ordnance Survey licence number 100046099. Additional data sourced from third parties, including public sector information licensed under the Open Government Licence v1.0.

- A5.15 In order to allow for uncertainties in local and future-year conditions, the dispersion model has been run five times, with each run using a different full year of hour-by-hour meteorological data from the nearest appropriate meteorological site. For each individual receptor point, the maximum predicted concentration across any of the five meteorological datasets has then been determined and reported in the assessment.
- A5.16 Hourly sequential meteorological data in sectors of 10 degrees from Mumbles Head for 2016-2020 have been used in the model. Wind roses for the site for the years 2016-2020 is provided in Figure A5.4. The station is operated by the UK Met Office. Quality Assured data were provided by the Met Office, and processed by AQC for use in ADMS.

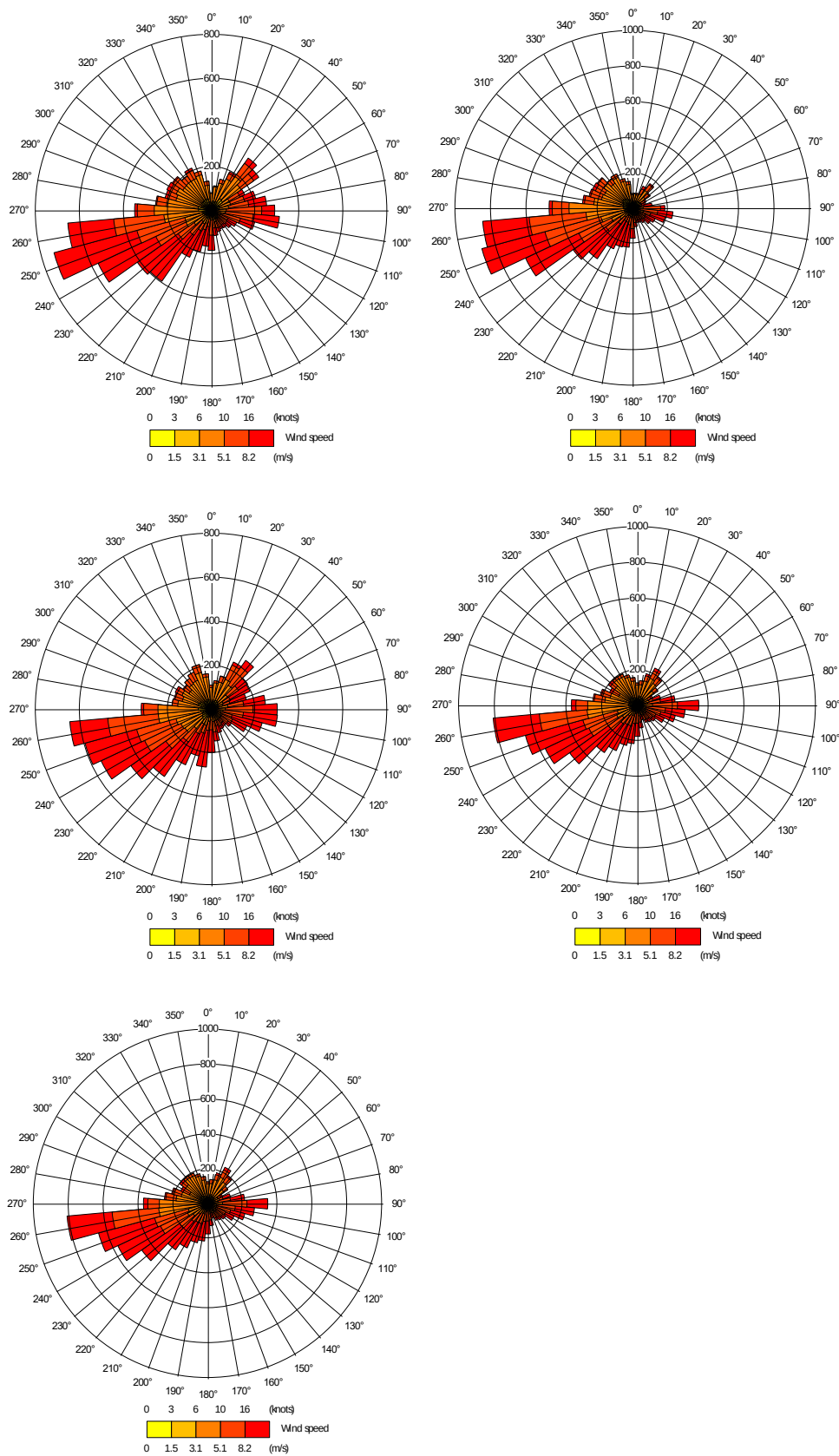
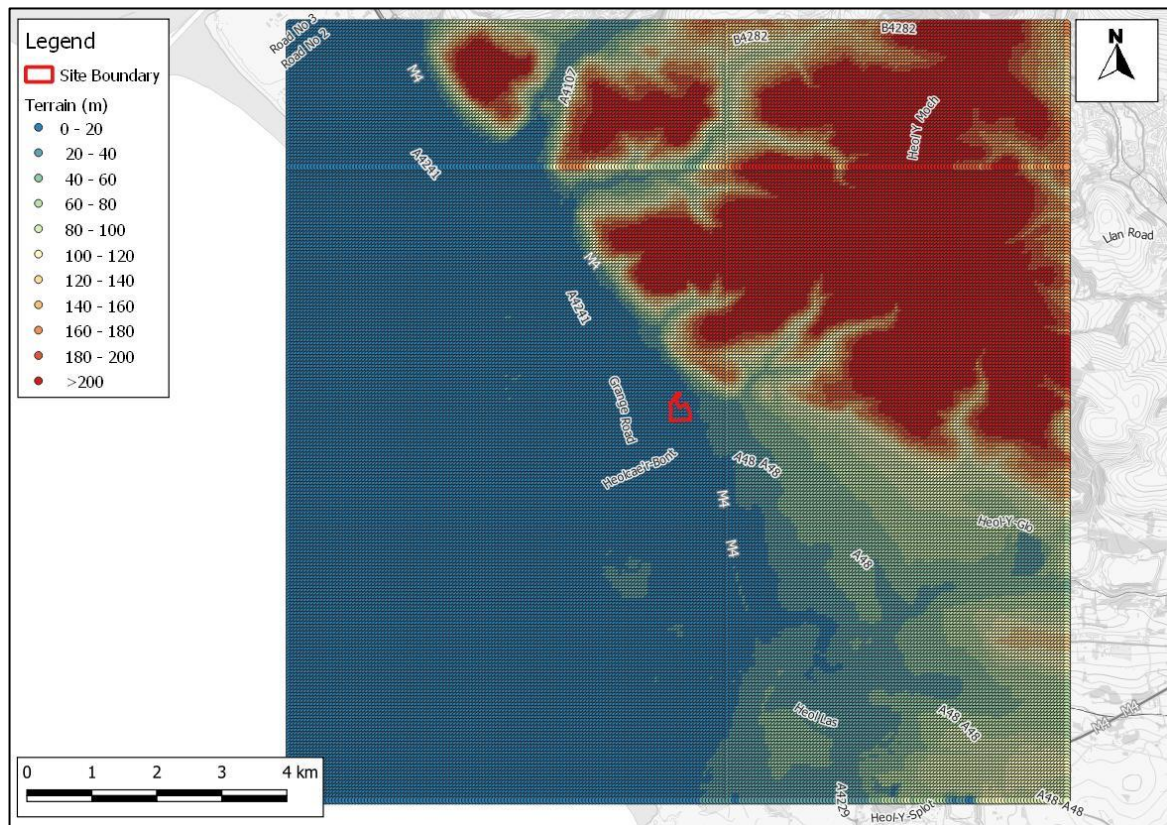


Figure A5.4: Wind Rose

A5.17 Figure A5.5 shows the terrain across the modelled study area using Ordnance Survey (OS) Terrain 50 data that has been included in the model set up. The area within the modelled domain is complex, with terrain heights increasing by more than 100 m within 1 km of the Proposed Development.

Figure A5.5: Terrain across Modelled Area



Contains Ordnance Survey data © Crown copyright and database right 2021. Ordnance Survey licence number 100046099. Additional data sourced from third parties, including public sector information licensed under the Open Government Licence v1.0

A5.18 The study area encompasses a range of land types. A variable surface roughness file has been used to represent the spatial variation of the surface roughness over each land type as shown in Figure A5.6. The following parameters have been used regarding surface roughness and land type:

- forest – 1.0 m;
- built-up area – 0.5 m;
- grassland – 0.2 m; and
- water – 0.0001 m.

Legend

- Site Boundary
- Surface Roughness
 - 0.0001
 - 0.2
 - 0.5
 - 1

Map showing the study area with various roads (A224, A225, A226, A227, A228, A229, A230, A231, A232, A233, A234, A235, A236, A237, A238, A239, A240, A241, A242, A243, A244, A245, A246, A247, A248, A249, A250, A251, A252, A253, A254, A255, A256, A257, A258, A259, A260, A261, A262, A263, A264, A265, A266, A267, A268, A269, A270, A271, A272, A273, A274, A275, A276, A277, A278, A279, A280, A281, A282, A283, A284, A285, A286, A287, A288, A289, A290, A291, A292, A293, A294, A295, A296, A297, A298, A299, A300, A301, A302, A303, A304, A305, A306, A307, A308, A309, A310, A311, A312, A313, A314, A315, A316, A317, A318, A319, A320, A321, A322, A323, A324, A325, A326, A327, A328, A329, A330, A331, A332, A333, A334, A335, A336, A337, A338, A339, A340, A341, A342, A343, A344, A345, A346, A347, A348, A349, A350, A351, A352, A353, A354, A355, A356, A357, A358, A359, A360, A361, A362, A363, A364, A365, A366, A367, A368, A369, A370, A371, A372, A373, A374, A375, A376, A377, A378, A379, A380, A381, A382, A383, A384, A385, A386, A387, A388, A389, A390, A391, A392, A393, A394, A395, A396, A397, A398, A399, A400, A401, A402, A403, A404, A405, A406, A407, A408, A409, A410, A411, A412, A413, A414, A415, A416, A417, A418, A419, A420, A421, A422, A423, A424, A425, A426, A427, A428, A429, A430, A431, A432, A433, A434, A435, A436, A437, A438, A439, A440, A441, A442, A443, A444, A445, A446, A447, A448, A449, A450, A451, A452, A453, A454, A455, A456, A457, A458, A459, A460, A461, A462, A463, A464, A465, A466, A467, A468, A469, A470, A471, A472, A473, A474, A475, A476, A477, A478, A479, A480, A481, A482, A483, A484, A485, A486, A487, A488, A489, A490, A491, A492, A493, A494, A495, A496, A497, A498, A499, A500, A501, A502, A503, A504, A505, A506, A507, A508, A509, A510, A511, A512, A513, A514, A515, A516, A517, A518, A519, A520, A521, A522, A523, A524, A525, A526, A527, A528, A529, A530, A531, A532, A533, A534, A535, A536, A537, A538, A539, A540, A541, A542, A543, A544, A545, A546, A547, A548, A549, A550, A551, A552, A553, A554, A555, A556, A557, A558, A559, A560, A561, A562, A563, A564, A565, A566, A567, A568, A569, A570, A571, A572, A573, A574, A575, A576, A577, A578, A579, A580, A581, A582, A583, A584, A585, A586, A587, A588, A589, A590, A591, A592, A593, A594, A595, A596, A597, A598, A599, A600, A601, A602, A603, A604, A605, A606, A607, A608, A609, A610, A611, A612, A613, A614, A615, A616, A617, A618, A619, A620, A621, A622, A623, A624, A625, A626, A627, A628, A629, A630, A631, A632, A633, A634, A635, A636, A637, A638, A639, A640, A641, A642, A643, A644, A645, A646, A647, A648, A649, A650, A651, A652, A653, A654, A655, A656, A657, A658, A659, A660, A661, A662, A663, A664, A665, A666, A667, A668, A669, A670, A671, A672, A673, A674, A675, A676, A677, A678, A679, A680, A681, A682, A683, A684, A685, A686, A687, A688, A689, A690, A691, A692, A693, A694, A695, A696, A697, A698, A699, A700, A701, A702, A703, A704, A705, A706, A707, A708, A709, A710, A711, A712, A713, A714, A715, A716, A717, A718, A719, A720, A721, A722, A723, A724, A725, A726, A727, A728, A729, A730, A731, A732, A733, A734, A735, A736, A737, A738, A739, A740, A741, A742, A743, A744, A745, A746, A747, A748, A749, A750, A751, A752, A753, A754, A755, A756, A757, A758, A759, A760, A761, A762, A763, A764, A765, A766, A767, A768, A769, A770, A771, A772, A773, A774, A775, A776, A777, A778, A779, A780, A781, A782, A783, A784, A785, A786, A787, A788, A789, A790, A791, A792, A793, A794, A795, A796, A797, A798, A799, A800, A801, A802, A803, A804, A805, A806, A807, A808, A809, A810, A811, A812, A813, A814, A815, A816, A817, A818, A819, A820, A821, A822, A823, A824, A825, A826, A827, A828, A829, A830, A831, A832, A833, A834, A835, A836, A837, A838, A839, A840, A841, A842, A843, A844, A845, A846, A847, A848, A849, A850, A851, A852, A853, A854, A855, A856, A857, A858, A859, A860, A861, A862, A863, A864, A865, A866, A867, A868, A869, A870, A871, A872, A873, A874, A875, A876, A877, A878, A879, A880, A881, A882, A883, A884, A885, A886, A887, A888, A889, A890, A891, A892, A893, A894, A895, A896, A897, A898, A899, A900, A901, A902, A903, A904, A905, A906, A907, A908, A909, A910, A911, A912, A913, A914, A915, A916, A917, A918, A919, A920, A921, A922, A923, A924, A925, A926, A927, A928, A929, A930, A931, A932, A933, A934, A935, A936, A937, A938, A939, A940, A941, A942, A943, A944, A945, A946, A947, A948, A949, A950, A951, A952, A953, A954, A955, A956, A957, A958, A959, A960, A961, A962, A963, A964, A965, A966, A967, A968, A969, A970, A971, A972, A973, A974, A975, A976, A977, A978, A979, A980, A981, A982, A983, A984, A985, A986, A987, A988, A989, A990, A991, A992, A993, A994, A995, A996, A997, A998, A999, A1000, A1001, A1002, A1003, A1004, A1005, A1006, A1007, A1008, A1009, A1010, A1011, A1012, A1013, A1014, A1015, A1016, A10

Deposition

A5.21 This produces a deposition rate in $\mu\text{g}/\text{m}^2/\text{s}$, which is then converted to a $\text{mg}/\text{m}^2/\text{day}$ figure for comparison with the maximum deposition rates.

Model Verification

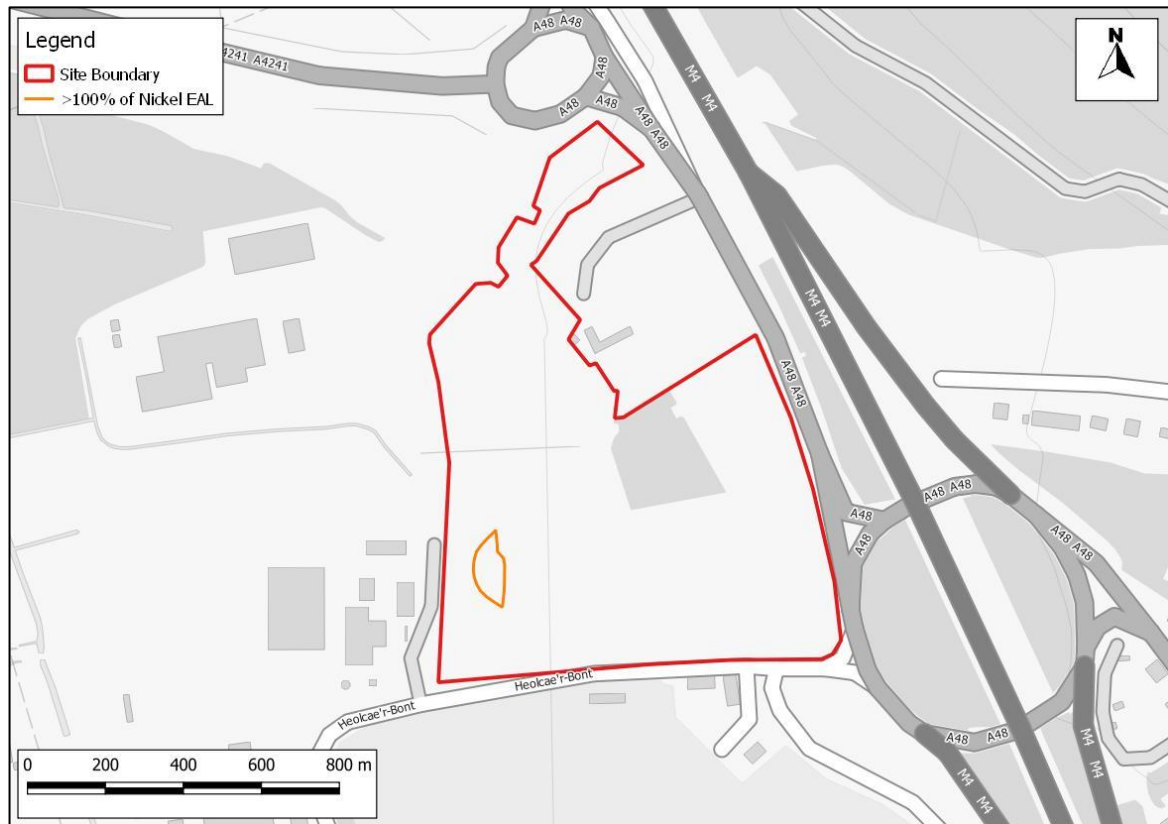
- A5.22 It is not practical, nor usual, to verify the ADMS-5 model, and, because ADMS-5 does not rely on estimated road-vehicle emission factors, the adjustment used for ADMS-Roads cannot be applied to ADMS-5. Predictions made using ADMS-5 have thus not been verified.

Post-processing

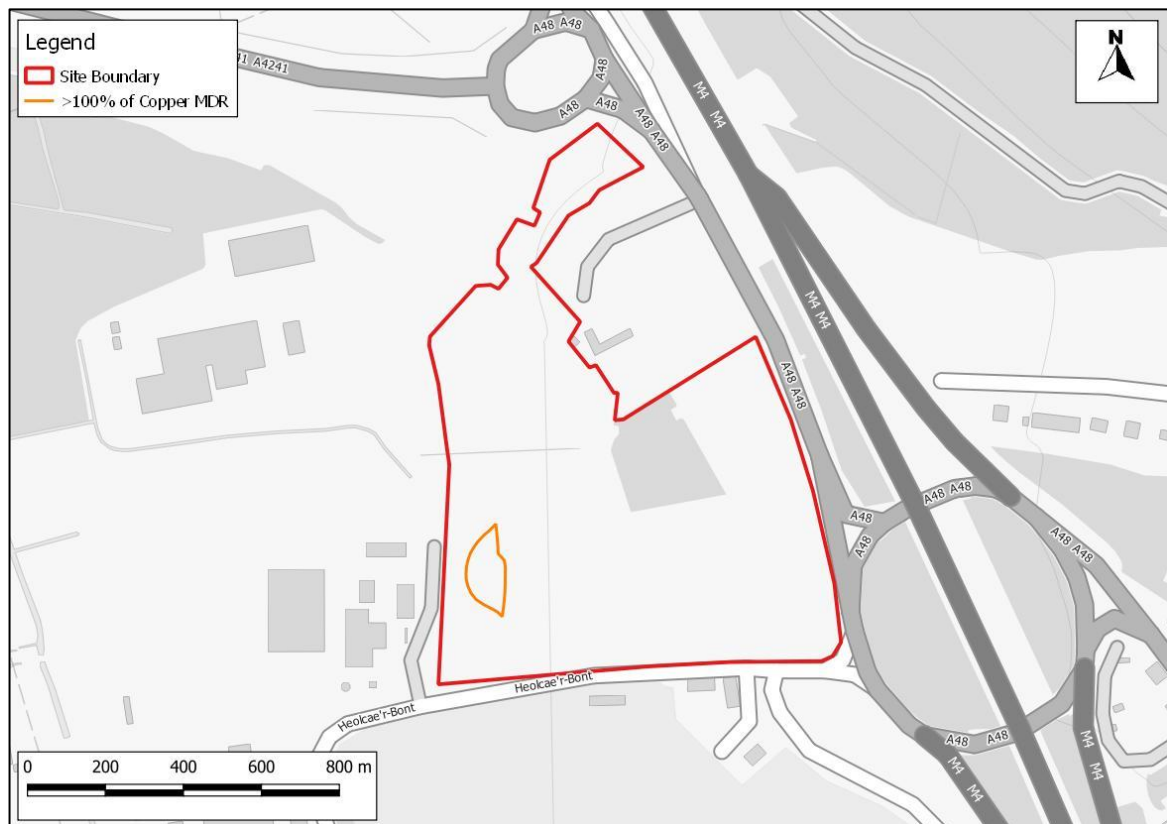
- A5.23 The processes that result in emissions from the POW and CLAS stacks operate on a batch basis and do not occur continuously. Data provided by Sandvik Osprey suggests the POW stacks would be in operation for an equivalent number of hours equating to 20% of the year, whilst the CLAS stacks would be operational for 90% of the year.
- A5.24 As the precise operational profile cannot be defined, for the purposes of assessing short-term impacts, it has been assumed that all stacks discharge to atmosphere continuously throughout the year so that those meteorological conditions most conducive for producing maximum hourly mean ground level concentrations can be captured.
- A5.25 However, this approach would significantly over-estimate the long-term, annual mean impacts. Consequently, in line with the Environment Agency's *Air emissions risk assessment for your environmental permit* guidance, temporal adjustment factors have been applied to the raw modelled annual mean process contributions, i.e., a factor of 0.2 has been applied to source group contributions from the POW stacks, whilst a factor of 0.9 has been applied to source group contributions from the CLAS stacks.

Concentration isopleths

- A5.26 Concentration isopleths for nickel concentrations in air and deposition rates of copper, i.e., those species whose process contributions contribute the greatest percentage towards the AQS/EALs are provided below. These show the areas where the nickel EAL and copper MDR are exceeded by the process contributions from the Powder Processing Plant. These exceedances occur within the site boundary where there is no relevant exposure and where the EAL and MDR do not apply.

Figure A5.7: Contour of Nickel EAL Exceedances

Contains Ordnance Survey data © Crown copyright and database right 2021. Ordnance Survey licence number 100046099. Additional data sourced from third parties, including public sector information licensed under the Open Government Licence v1.0

Figure A5.8: Contour of Copper MDR Exceedances

Contains Ordnance Survey data © Crown copyright and database right 2021. Ordnance Survey licence number 100046099. Additional data sourced from third parties, including public sector information licensed under the Open Government Licence v1.0

A6 Construction Mitigation

A6.1 Table A6.1 sets out a list of best-practice measures from the IAQM guidance (IAQM, 2016) that should be incorporated into the specification for the works. These measures should ideally be written into a Dust Management Plan. Some of the measures may only be necessary during specific phases of work, or during activities with a high potential to produce dust, and the list should be refined and expanded upon in liaison with the construction contractor when producing the Dust Management Plan.

Table A6.1: Best-Practice Mitigation Measures Recommended for the Works

Measure	Desirable	Highly Recommended
Communications		
Develop and implement a stakeholder communications plan that includes community engagement before and during work on site		✓
Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environmental manager/engineer or the site manager		✓
Display the head or regional office contact information		✓
Dust Management Plan		
Develop and implement a Dust Management Plan (DMP) approved by the Local Authority which documents the mitigation measures to be applied, and the procedures for their implementation and management		✓
Site Management		
Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken		✓
Make the complaints log available to the local authority when asked		✓
Record any exceptional incidents that cause dust and/or air emissions, either on- or off- site, and the action taken to resolve the situation in the log book		✓
Hold regular liaison meetings with other high risk construction sites within 500 m of the site boundary, to ensure plans are co-ordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the off-site transport/deliveries which might be using the same strategic road network routes		✓
Monitoring		
Undertake daily on-site and off-site inspections where receptors (including roads) are nearby, to monitor dust. Record inspection results, and make the log available to the Local Authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100 m of the site boundary, with cleaning to be provided if necessary	✓	

Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the Local Authority when asked		✓
Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions		✓
Agree dust deposition, dust flux, or real-time PM ₁₀ continuous monitoring locations with the Local Authority. Where possible commence baseline monitoring at least three months before work commences on site or, if it is a large site, before work on a phase commences. Further guidance is provided by IAQM on monitoring during demolition, earthworks and construction (IAQM, 2018)		✓
Preparing and Maintaining the Site		
Plan the site layout so that machinery and dust-causing activities are located away from receptors, as far as is possible		✓
Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site		✓
Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period		✓
Avoid site runoff of water or mud		✓
Keep site fencing, barriers and scaffolding clean using wet methods		✓
Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below		✓
Cover, seed, or fence stockpiles to prevent wind whipping		✓
Operating Vehicle/Machinery and Sustainable Travel		
Ensure all vehicles switch off their engines when stationary – no idling vehicles		✓
Avoid the use of diesel- or petrol-powered generators and use mains electricity or battery-powered equipment where practicable		✓
Impose and signpost a maximum-speed-limit of 15 mph on surfaced and 10 mph on un-surfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate)	✓	
Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials		✓
Implement a Travel Plan that supports and encourages sustainable staff travel (public transport, cycling, walking, and car-sharing)	✓	
Operations		
Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems		✓
Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate		✓

Use enclosed chutes, conveyors and covered skips		✓
Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate		✓
Ensure equipment is readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods		✓
Waste Management		
Avoid bonfires and burning of waste materials		✓
Measures Specific to Earthworks		
Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable	✓	
Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable	✓	
Only remove the cover from small areas during work, not all at once	✓	
Measures Specific to Construction		
Avoid scabbling (roughening of concrete surfaces), if 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		✓
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	✓	
For smaller supplies of fine powder materials ensure bags are sealed after use and stored appropriately to prevent dust	✓	
Access gates should be located at least 10 m from receptors, where possible		✓