

Graeme Thorpe

6 APR 2013

From: James Russell
Sent: 05 April 2013 12:32
To: Graeme Thorpe
Cc: John Macholc; Sarah Westwood
Subject: Evaluation of Air Quality Assessment - Land @ Henthorn Road, Clitheroe - 3/2012/1092P

Importance: High

Dear Graeme,

I have evaluated the planning report prepared by Ashley Helme Associates on behalf of The Strategic Land Group and can make the following comments;

It is assumed that the following will be considered in conjunction with previous comments

Air Quality

General: When determining this application, It will be necessary to balance the need for additional housing against Air Quality impacts. Currently, any developments of any size in Clitheroe are likely to have a 'small/negligible' affect on air quality but when combined together, will result in an increasing problem and issues where result in exceedences of current air quality objectives, **particularly if the emissions from vehicles continue not to reduce inline with DEFRA expectations over the next 10-15 yrs.**

The assessment report appears incomplete in that it has not included reference to;

- Standen Development - potential 1200 additional dwellings and additional impact upon the Whalley Road Air Quality Management Area;
- NOx tube data: The report uses the 2011 baseline data for NOx which is not the most up to date available. We are awaiting validation of 2012 levels, **but the 2012 results suggest a substantial increase in levels in the AQMA against government predicted**, and therefore background map trends. Also the results for 2012 are far more constant. Para 8.1.2 recognises the current exceedence of the AQO for Nox;
- Para 9.8.1, Page 27 predicts an annual mean concentration for Nitrogen Dioxide (NO2) for receptors in the Whalley Road Air Quality Management Area which currently exceeds the Air Quality Objective of 40 ug/m3 to substantially reduce to 33.89 ug/m3 by 2016 and 30.94 ug/m3 by 2021 with this development. It will be necessary to review this conclusion in light of the previous comments;

Specific

- The report identifies (Par 9.8.1 - P.27) that due to increased numbers of vehicles, this development will have an impact and will add to and increase the levels of NO2, which are already of concern and has resulted in the declaration of the Whalley Road Air Quality Management Area. Whilst the increased contribution is relatively small and arguably imperceptible, being in the order of 0.2 to 0.3 micrograms per metre cube (ugms/m3) ie below 1%, this is **therefore likely to result in an increase of current annual mean levels from 42 to 42.3 ugms/m3, where the National Air Quality Objective sets a limit of 40. It would appear appropriate to ask that the scheme be reviewed with regard to increasing development vehicle egress points, improve traffic flow and direction generally, to minimise 'increased' traffic through the Whalley Road/St James's Street road junction and minimise increase in NO2.** Alternatively, future developers could be approached 'collectively' to provide funding to buy out the limited number of residential properties within the Air Quality Area with a view to road improvement scheme to resolve the Air Quality Issue.
- As part of any mitigation scheme, I would recommend that the developer be required to make provision for a bike scheme/bus pass for each house to seek to reduce vehicle traffic entering Clitheroe as a result of this development. County may be able to provide more info (Neil Stevens?).
- Furthermore, construction to be undertaken in accordance with an appropriate dust management plan. The measures outlined in Chapter 10 require more detail. Furthermore, the mitigation measures to be extended to include no burning of waste etc on site;

General - Control of Noise:

- This site will be a large and long-term construction site. I would recommend the following conditions;

- construction be undertaken in accordance with BS 5228:2009 Code Of Practice titled 'Noise and Vibration Control on Construction and Open Sites', as such ***ask for condition to require Dust & Noise Management Plans for the construction phase***; and in particular,
- Construction hrs to be restricted to Mon - Fri 08.00-18.00, Sat 09.00-13.00 and no construction permitted on Sun or Bank Holidays.
- A Noise Management Plan should be provided before commencement of construction, to include;
 - location of site office, compound and storage.
 - to require no deliveries or vehicles to arrive on site outside stipulated working hours
 - wheel wash
- Developer be required to achieve noise rating level for fixed items of plant to be 5dB below existing background levels

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