

---

**From:** Daniel McCrory <Daniel.Mccrory@staffsmoorlands.gov.uk>

**Sent:** Friday, August 9, 2024 3:35 PM

**To:** Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>

**Cc:** Christopher Humphreys <Christopher.Humphreys@highpeak.gov.uk>

**Subject:** RE: HPK/2024/0154 - Environmental Health Consultation#

Hi Rachael,

**Air Quality Comments:**

The applicant has submitted an AQ assessment to accompany the application produced by [Redmore Environmental](#). The report looks at potential impacts associated with fugitive dust emissions during the construction phase; potential impacts associated with road transport emissions during the operational phase of the proposed development; and was intended to identify any requirement for relevant mitigation measures. The assessment did not consider the current AQ at the site, though that is unlikely to be an issue.

**Construction – Dust**

The assessment itself is fairly standard and done generally inline with Institute of Air Quality Management methodology (IAQM-assessment of dust from demolition activities etc). As is common with these types of assessments it recognises that during the construction phase of the development there is the potential for air quality impacts as a result of fugitive dust emissions from the site. The assessment concludes that these dust impacts will not affect sensitive receptors because it already assumes that the operator will definitely adopt certain good practice mitigation practices, which it lists in Table 16.

This is essentially fine but clearly for this conclusion to be valid and the report accepted we need confidence that all of these measures will be definitely implemented.

It is recommended therefore that the previous dust condition is amended to:

**2. CDD01B - CONSTRUCTION AND DEMOLITION – DUST**

No phase of the development hereby permitted shall take place until Construction Environmental Management Plan (CEMP) has been submitted and approved in writing by the Local Planning Authority. The CEMP should include all of the control measures outlined in: Table 16 Fugitive Dust Emission Mitigation Measures in the Air Quality Assessment produced by [Redmore Environmental](#) submitted in support of the development. Once approved All works shall be carried out in accordance with the approved details. Any alteration to this Plan shall be approved in writing by the Local Planning Authority prior to commencement of the alteration.

If during the course of the development hereby permitted, any activity at the

site causes dust to be emitted beyond the site boundary, so as to adversely affect adjacent residential properties and/or other sensitive uses and/or the local environment, the activity shall be stopped until sufficient dust suppression has been undertaken to prevent further escape.

#### Operational Impacts

Potential air quality impacts during the operational phase of the proposals may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the development. The applicant has undertaken dispersion modelling to predict pollutant concentrations at sensitive locations as a result of emissions from the highway network both with and without the development in place. The sensitive receptors include areas in the dinting vale AQMA, which is within very close to the proposed development.

The air quality impacts as a result of traffic generated by the development were not predicted to be significant at any sensitive location in the vicinity of the site.

The assessment is considered to be OK but does have a reasonably high level of uncertainty. Such as, the traffic data used does not account for committed developments in the Glossop area, nor does it make any reference to the A57 link road, which is due to commence in 2015, and will potentially add significantly further traffic. The speeds used in the assessment are a bit optimistic for some of the areas, and typically it would have been anticipated that some additional model improvement occurred prior to the correction factor being applied.

The above noted, the increase in traffic due to the development has been accepted by DCC highways as being negligible, and it is accepted that even with the uncertainties noted above, the impact of the above scheme will likely only be slight. However, this is still an increase and the applicant has also not noted any other additional mitigation / enhancements that may further reduce the AQ impacts of the development (e.g. travel plans, EV infrastructure etc). Therefore, although the development is unlikely to have any significant negative effect it also does not contribute to any AQ improvements or benefits.

As part of the air quality action plan for the area, HPBC are seeking to install real time monitoring in the AQMA (NOx and PM10) to better inform potential actions to improve AQ in the area.

It is recommended that the applicant support the actions the council is wishing to undertake to improve air quality in the form of a financial contribution to help implement actions associated with the revised draft air quality action plan, namely the installation of real time monitoring of Nitrogen Dioxide and Particulate matter (PM) and possibly to support a further feasibility study into local sustainable travel in the area.

We would therefore seek a contribution of **£7800** to cover the ongoing (not purchase) costs of two sensors for two years, to cover the construction and implementation period of the development. Alternatively, the applicant can determine the financial contribution using the [Air quality appraisal: damage](#) costs (as outlined in our SPD section 4.36) .

This should either be as a condition of the planning permission or secured via a s.106 agreement.

In addition; the applicant is reminded that they will be required to install EV / EV infrastructure in accordance with Approved Document S: infrastructure for charging electric vehicles

All the Best

Dan

**Dr. Daniel McCrory** Principal Pollution Officer

Environmental Health

High Peak Borough Council and Staffordshire Moorlands District Council

Tel: **01538 395400 Ext: 4413** Mob: **07736380776**

[www.highpeak.gov.uk](http://www.highpeak.gov.uk) | Follow HPBC on X (Formerly Twitter) | [Facebook](#)

[www.staffsmoorlands.gov.uk](http://www.staffsmoorlands.gov.uk) | Follow SMDC on X (Formerly Twitter) | [Facebook](#)



**High Peak**  
Borough Council



STAFFORDSHIRE  
**moorlands**  
DISTRICT COUNCIL  
ACHIEVING EXCELLENCE

---

Do you really need to print out this Email? Be green - keep it on the screen.

This email is intended for the addressee(s) only and may contain sensitive, privileged or confidential information that could be protectively marked. If you are not the addressee please do not use the information in any way. If you have received this email in error please notify the sender immediately and delete it from your system. Thank you.

The Council may be required to disclose this email or any responses to it under the Freedom of Information Act 2000. The way in which we handle personal information is set out in our privacy notice and is available at <https://www.staffs Moorlands.gov.uk/YourData>

---