

Air Quality Assessment

71 – 73 Caversham Road, Reading

For S2 Estates Limited

Quality Management

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Executive Summary

The 71 – 73 Caversham Road development is located within the administrative area of Reading Borough Council (RBC). RBC has designated an Air Quality Management Area (AQMA) around the town centre and major radial roads due to elevated concentrations of nitrogen dioxide (NO₂) attributable to road traffic emissions. The Application Site is located within this designated AQMA.

This Air Quality Assessment, undertaken to accompany the planning application, considers the air quality impacts from the construction phase and once the Proposed Development is fully operational.

The assessment has been undertaken based upon appropriate information on the Proposed Development provided by S2 Estates Limited and its project team. In undertaking this assessment, RPS experts have exercised professional skills and judgement to the best of their abilities and have given professional opinions that are objective, reliable and backed with scientific rigour. These professional responsibilities are in accordance with the code of professional conduct set by the Institution of Environmental Sciences for members of the Institute of Air Quality Management (IAQM).

For the construction phase, the most important consideration is dust. Without appropriate mitigation, dust could cause temporary soiling of surfaces, particularly windows, cars and laundry. The mitigation measures provided within this report should ensure that the risk of adverse dust effects is reduced to a level categorised as ‘not significant’.

For the operational phase, arrivals at and departures from the Proposed Development may change the number, type and speed of vehicles using the local road network. Changes in road vehicle emissions are the most important consideration during this phase of the development.

Detailed atmospheric dispersion modelling has been undertaken for the first year in which the development is expected to be fully operational, 2022. Pollutant concentrations are predicted to be within the relevant health-based air quality objectives at the façades of both existing and proposed receptors. Therefore, air quality is acceptable at the development site, making it suitable for its proposed uses. The operational impact of the Proposed Development on existing receptors is predicted to be ‘negligible’ taking into account the changes in pollutant concentrations and absolute levels. Using the criteria adopted for this assessment together with professional judgement, the operational air quality effects are considered to be ‘not significant’ overall.

The 71 – 73 Caversham Road development does not, in air quality terms, conflict with national or local policies, or with measures set out in RBC’s Air Quality Action Plan. There are no constraints to the development in the context of air quality.

Contents

1	Introduction	1
2	Policy and Legislative Context	2
	Ambient Air Quality Legislation and National Policy	2
	National Planning Policy	4
	Local Planning Policy	6
3	Assessment Methodology.....	8
	Summary of Key Pollutants Considered	9
	Construction Phase - Methodology.....	10
	Operational Phase - Methodology.....	11
4	Baseline Air Quality Conditions	21
	Overview	21
	Review and Assessment Process.....	21
	Local Urban Background Monitoring.....	22
	Defra Mapped Concentration Estimates	22
	Appropriate Background Concentrations for the Development Site	23
5	Assessment of Construction-Phase Air Quality Impacts	25
	Construction Dust.....	25
	Risk of Dust Impacts	25
6	Assessment of Operational-Phase Air Quality Impacts.....	28
	Assessment of Air Quality Impacts on Surrounding Area	28
	Assessment of New Population Exposure (Site Suitability)	30
	Significance of Effects	31
	Sensitivity and Uncertainty	32
7	Mitigation	33
	Mitigation During Construction	33
	Mitigation for the Operational Impact of the Development on the Surrounding Area	34
	Mitigation for New Population Exposure (Site Suitability)	34
8	Conclusions	35
	Assessment of Air Quality Impacts on Surrounding Area	14
	Assessment of New Population Exposure (Site Suitability)	16

Tables, Figures and Appendices

Tables

Table 2.1 Summary of Relevant Air Quality Limit Values and Objectives	3
Table 3.1 Traffic Data Used Within the Assessment	13
Table 3.2 Examples of Where Air Quality Objectives Apply	14
Table 3.3 Modelled Sensitive Receptors	15
Table 3.4 Impact Descriptors for Individual Sensitive Receptors	17
Table 3.5 Approaches to Dealing with Uncertainty used Within the Assessment	19
Table 4.1 Automatically Monitored Urban Background Annual-Mean Concentrations	22
Table 4.2 Defra Mapped Annual-Mean Background NO ₂ Concentration Estimates	22
Table 4.3 Defra Mapped Annual-Mean Background PM ₁₀ Concentration Estimates	23
Table 4.4 Defra Mapped Annual-Mean Background PM _{2.5} Concentration Estimates	23
Table 4.5 Summary of Background Annual-Mean (Long-term) Concentrations used in the Assessment	24
Table 5.1 Dust Emission Magnitude for Demolition, Earthworks, Construction and Trackout	26
Table 5.2 Sensitivity of the Surrounding Area for Demolition, Earthworks and Construction	26
Table 5.3 Sensitivity of the Surrounding Area for Trackout	26
Table 5.4 Dust Impact Risk for Demolition, Earthworks, Construction and Trackout	27
Table 6.1 Predicted Annual-Mean NO ₂ Impacts at Existing Receptors	28
Table 6.2 Predicted Annual-Mean PM ₁₀ Impacts at Existing Receptors	29
Table 6.3 Predicted Annual-Mean PM _{2.5} Impacts at Existing Receptors	30
Table 6.4 Predicted Annual-Mean NO ₂ , PM ₁₀ and PM _{2.5} Concentrations (µg.m ⁻³) at Proposed Receptors	30
Table 8.1 Predicted Annual-Mean NO ₂ Impacts at Existing Receptors	14
Table 8.2 Predicted Annual-Mean PM ₁₀ Impacts at Existing Receptors	15
Table 8.3 Predicted Annual-Mean PM _{2.5} Impacts at Existing Receptors	16
Table 8.4 Predicted Annual-Mean NO ₂ , PM ₁₀ and PM _{2.5} Concentrations (µg.m ⁻³) at Proposed Receptors	16

Figures

Figure 3.1 Types of Vehicle Emissions

Figure 3.2 Air Pollution: From Emissions to Exposure

Figure 1: Modelled Roads and Receptors

Figure 2: Windrose – Benson, 2016

Figure 3: Construction Dust Assessment

Appendices

Appendix A: Detailed Construction Dust Assessment Methodology

Appendix B: Model Verification

Appendix C: Sensitivity Test

1 Introduction

- 1.1 This report details the air quality assessment undertaken for the Proposed Development at 71 – 73 Caversham Road in Reading. The Application Site is located within the administrative area of Reading Borough Council (RBC). RBC has designated an Air Quality Management Area (AQMA) around the town centre and major radial roads due to elevated concentrations of nitrogen dioxide (NO₂) attributable to road traffic emissions. The Application Site is located within this designated AQMA.
- 1.2 This air quality assessment covers the:
- Construction phase - an evaluation of the temporary effects from fugitive construction dust and construction-vehicle exhaust emissions; and the
 - Operational phase – an evaluation of
 - the impacts of the development traffic on the local area
 - the impacts on future occupants of the development from their exposure to the prevailing levels of air pollution, which can be a factor in the suitability of the site for its proposed uses.
- 1.3 This report begins by setting out the policy and legislative context for the assessment. The methods and criteria used to assess potential air quality effects have then been described. The baseline air quality conditions have been established taking into account Defra estimates, local authority documents and the results of any local monitoring. The results of the assessment of air quality impacts have been presented. A conclusion has been drawn on the significance of the residual construction-phase effects and the residual operational-phase effects.

2 Policy and Legislative Context

Ambient Air Quality Legislation and National Policy

The Ambient Air Quality Directive and Air Quality Standards Regulations

- 2.1 The 2008 Ambient Air Quality Directive (2008/50/EC) [1] aims to protect human health and the environment by avoiding, reducing or preventing harmful concentrations of air pollutants; it sets legally binding concentration-based limit values, as well as target values. There are also information and alert thresholds for reporting purposes. These are to be achieved for the main air pollutants: particulate matter (PM₁₀ and PM_{2.5}), nitrogen dioxide (NO₂), sulphur dioxide (SO₂), ozone (O₃), carbon monoxide (CO), lead (Pb) and benzene. This Directive replaced most of the previous EU air quality legislation and in England was transposed into domestic law by the Air Quality Standards Regulations 2010 [2], which in addition incorporates the 4th Air Quality Daughter Directive (2004/107/EC) that sets targets for ambient air concentrations of certain toxic heavy metals (arsenic, cadmium and nickel) and polycyclic aromatic hydrocarbons (PAHs). Member states must comply with the limit values (which are legally binding on the Secretary of State) and the Government and devolved administrations operate various national ambient air quality monitoring networks to measure compliance and develop plans to meet the limit values.

UK Air Quality Strategy

- 2.2 The Environment Act 1995 established the requirement for the Government and the devolved administrations to produce a National Air Quality Strategy (AQS) for improving ambient air quality, the first being published in 1997 and having been revised several times since, with the latest published in 2007 [3]. The Strategy sets UK air quality standards^{*} and objectives[#] for the pollutants in the Air Quality Standards Regulations plus 1,3-butadiene and recognises that action at national, regional and local level may be needed, depending on the scale and nature of the air quality problem. There is no legal requirement to meet objectives set within the UK AQS except where equivalent limit values are set within the EU Directives.
- 2.3 The 1995 Environment Act also established the UK system of Local Air Quality Management (LAQM), that requires local authorities to go through a process of review and assessment of air

^{*} Standards are concentrations of pollutants in the atmosphere which can broadly be taken to achieve a certain level of environmental quality. Standards, as the benchmarks for setting objectives, are set purely with regard to scientific evidence and medical evidence on the effects of the particular pollutant on health, or on the wider environment, as minimum or zero risk levels.

[#] Objectives are policy targets expressed as a concentration that should be achieved, all the time or for a percentage of time, by a certain date.

quality in their areas, identifying places where objectives are not likely to be met, then declaring Air Quality Management Areas (AQMA) and putting in place Air Quality Action Plans to improve air quality. These plans also contribute, at local level, to the achievement of EU limit values.

- 2.4 For the purposes of this assessment, the limit values set out in the Air Quality Standards Regulations 2010 and the objective levels specified under the current UK AQS have been used.
- 2.5 The limit values and objectives relevant to this assessment are summarised in Table 2.1. Although the EU limit values and the UK AQS objectives are numerically equal, there are some differences in where they apply and who is responsible for their achievement.

Table 2.1 Summary of Relevant Air Quality Limit Values and Objectives

Pollutant	Averaging Period	Objectives/ Limit Values	Not to be Exceeded More Than	Target Date
Nitrogen Dioxide (NO ₂)	1 hour	200 µg.m ⁻³	18 times per calendar year	-
	Annual	40 µg.m ⁻³	-	-
Particulate Matter (PM ₁₀)	24 Hour	50 µg.m ⁻³	35 times per calendar year	-
	Annual	40 µg.m ⁻³	-	-
Particulate Matter (PM _{2.5})	Annual	25 µg.m ⁻³	-	01.01.2020 (a)
				01.01.2015 (b)

(a) Target date set in UK Air Quality Strategy 2007

(b) Target date set in Air Quality Standards Regulations 2010

- 2.6 In July 2017, Defra published the '*UK plan for tackling roadside nitrogen dioxide concentrations*'. This describes the Government's plan for bringing roads with NO₂ concentrations above the EU Limit Value back into compliance within the shortest possible time, covering five cities, the GLA and 23 other local authorities. A Supplement to the plan was published in October 2018, which sets out measures to bring forward compliance in a further 33 local authorities that had not been covered by actions in the July 2017 plan because they had been projected to comply with the EU Limit Value by 2021.
- 2.7 On 14 January 2019, Defra published the '*Clean Air Strategy 2019*'. The report sets out actions that the Government intends to take to reduce emissions from transport, in the home, from farming and from industry.

National Planning Policy

National Planning Policy Framework

2.8 The National Planning Policy Framework (NPPF) [4] is a material consideration for local planning authorities and decision-takers in determining applications. At the heart of the NPPF, is a presumption in favour of sustainable development, subject to caveats where a plan or project affects a habitats site. For determining planning applications, this means approving development proposals if they accord with an up-to-date local development plan, unless material considerations indicate otherwise. If the development plan does not contain relevant policies, or the policies are out of date, then planning permission should be granted unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development, or any adverse impacts would significantly outweigh the benefits.

2.9 The NPPF sets out three overarching objectives to achieve sustainable development. The relevant objective in the context of this air quality assessment is:

“an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution and adapting to climate change, including moving to a low carbon economy” (Paragraph 8c)

2.10 Under the heading ‘Promoting sustainable transport’, the NPPF states:

“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.” (Paragraph 103)

2.11 Under the heading ‘Conserving and enhancing the natural environment’, the NPPF states:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

...

Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; ...” (Paragraph 170)

“Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.”
(Paragraph 181)

National Planning Practice Guidance

2.12 The National Planning Practice Guidance (NPPG) was issued on-line in March 2014 and is updated periodically by government as a live document. The Air Quality section of the NPPG describes the circumstances when air quality, odour and dust can be a planning concern, requiring assessment.

2.13 The NPPG advises 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 generate air quality impact 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).

2.14 The NPPG states that when deciding whether air quality is relevant to a planning application, considerations could include whether the development would:

“Significantly affect traffic in the immediate vicinity of the proposed development site or further afield. This could be by generating or increasing traffic congestion; significantly changing traffic volumes, vehicle speed or both; or significantly altering the traffic composition on local roads. Other matters to consider include whether the proposal involves the development of a bus station, coach or lorry park; adds to turnover in a large car park; or result in construction sites that would generate large Heavy Goods Vehicle flows over a period of a year or more.

Introduce new point sources of air pollution. This could include furnaces which require prior notification to local authorities; or extraction systems (including chimneys) which require approval under pollution control legislation or biomass boilers or biomass-fuelled CHP plant; centralised boilers or CHP plant burning other fuels within or close to an air quality management area or introduce relevant combustion within a Smoke Control Area;

Expose people to existing sources of air pollutants. This could be by building new homes, workplaces or other development in places with poor air quality.

Give rise to potentially unacceptable impact (such as dust) during construction for nearby sensitive locations.

Affect biodiversity. In particular, is it likely to result in deposition or concentration of pollutants that significantly affect a European-designated wildlife site, and is not directly connected with or necessary to the management of the site, or does it otherwise affect biodiversity, particularly designated wildlife sites.”

- 2.15 The NPPG provides advice on how air quality impacts can be mitigated and notes “Mitigation options where necessary will be locationally specific, will depend on the proposed development and should be proportionate to the likely impact. It is important therefore that local planning authorities work with applicants to consider appropriate mitigation so as to ensure the new development is appropriate for its location and unacceptable risks are prevented. Planning conditions and obligations can be used to secure mitigation where the relevant tests are met.”

Local Planning Policy

- 2.16 In September 2004, the Planning & Compulsory Purchase Act [5] introduced a new development plan system intended to streamline the local planning process. Under the new system, Local Plans will be replaced by a Local Development Framework (LDF). RBC are currently developing a new Local Plan which will set out new policies up to 2036. The new Local Plan will replace the current development plans (the Core Strategy, Reading Central Area Action Plan, and the Sites and Detailed Policies Document).

- 2.17 Consultation on a Pre-Submission Draft Local Plan [6] began in November 2017 and ended in January 2018. Policies relevant to Air Quality that are covered in the Pre-Submission Draft Local Plan include:

“EN15: Air Quality

Development should have regard to the need to improve air quality and reduce the effects of poor air quality.

Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated. The following criteria should be taken into account:

Whether the proposal, included when combined with the cumulative effect of other developments already permitted, would worsen air quality;

Whether the development is within, or accessed via, an Air Quality Management Area; and

Whether it can be demonstrated that a local worsening in air quality that would not detrimentally affect human health or the environment would be offset by an overall improvement in air quality, for instance through reduction in the need to travel.

Where a development would introduce sensitive users (such as residential, schools and nurseries, hospitals, care facilities) into, or intensify such uses within, an Air Quality Management Area, detrimental effects on that use will be mitigated. Mitigation measures should be detailed in any planning application. If there are significant detrimental effects that cannot be mitigated, the application should be refused.

Where required, planning obligations will be used to secure contributions to measures to tackle poor air quality or for air quality monitoring.”

- 2.18 RBC’s Sites and Detailed Policies Document (with alteration adopted 27 January 2015) includes policy DM19: AIR QUALITY which states that

“Development should have regard to the need to improve air quality and reduce the effects of poor air quality.

- i. Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated. The following criteria should be taken into account:*
 - Whether the proposal, including when combined with the cumulative effect of other developments already permitted, would significantly reduce air quality;
 - Whether the development is within, or accessed via, an Air Quality Management Area; and
 - Whether it can be demonstrated that a local reduction in air quality would be offset by an overall improvement in air quality, for instance through reduction in the need to travel.
- ii. Where a development would introduce sensitive uses (such as residential, schools and nurseries, hospitals, care facilities) into, or intensify such uses within, an Air Quality Management Area, detrimental effects on that use will be mitigated. Mitigation measures should be detailed in any planning application.*
- iii. Where required, planning obligations will be used to secure contributions to measures to tackle poor air quality or for air quality monitoring.”*

3 Assessment Methodology

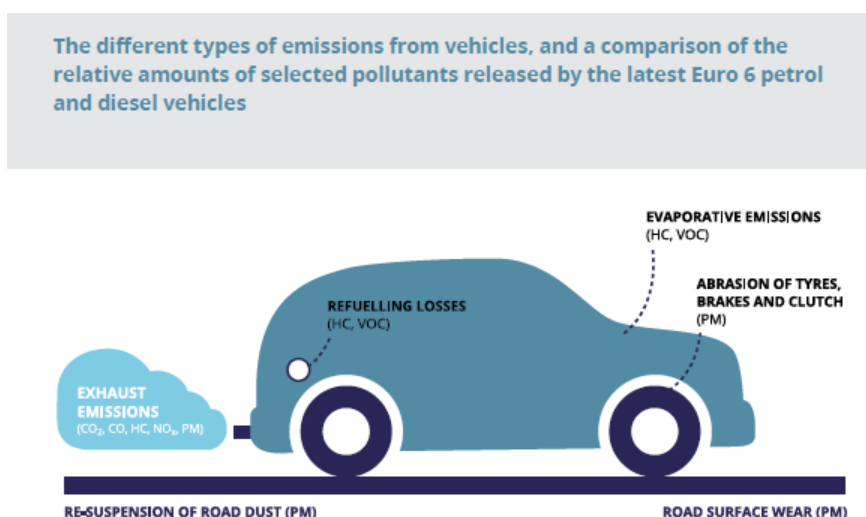
- 3.1 Neither the NPPF nor the NPPG is prescriptive on the methodology for assessing air quality effects or describing significance; practitioners continue to use guidance provided by Defra and non-governmental organisations, including Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM). However, the NPPG does advise that *“Assessments should be proportionate to the nature and scale of development proposed and the level of concern about air quality, and because of this are likely to be locationally specific. The scope and content of supporting information is therefore best discussed and agreed between the local planning authority and applicant before it is commissioned.”* It lists several areas that might be usefully agreed at the outset.
- 3.2 This air quality assessment covers the elements recommended in the NPPG. The approach is consistent with the EPUK & IAQM *Land-Use Planning & Development Control: Planning For Air Quality* document [7], the IAQM *Guidance on the assessment of dust from demolition and construction* [8] and, where relevant, Defra’s *Local Air Quality Management Technical Guidance: LAQM.TG16* [9]. It includes the key elements listed below:
- assessment of the existing air quality in the study area (existing baseline) and prediction of the future air quality without the development in place (future baseline), using official government estimates from Defra, publically available air quality monitoring data for the area, and relevant Air Quality Review and Assessment (R&A) documents;
 - a qualitative assessment of likely construction-phase impacts with mitigation and controls in place; and
 - a quantitative prediction of the future operational-phase air quality impact with the development in place (with any necessary mitigation), encompassing
 - the impacts of the development traffic on the local area
 - the impacts on future occupants of the development from their exposure to the prevailing levels of air pollution, which can be a factor in the suitability of the site for its proposed uses.
- 3.3 In line with the guidance set out in the NPPG, the Environmental Health Department at RBC was consulted to agree the scope and methodology for this assessment [10].
- 3.4 Air quality guidance advises that the organisation engaged in assessing the overall risks should hold relevant qualifications and/or extensive experience in undertaking air quality assessments. The RPS air quality team members involved at various stages of this assessment have professional affiliations that include Fellow and Member of the Institute of Air Quality Management, Chartered Chemist, Chartered Scientist, Chartered Environmentalist and Member

of the Royal Society of Chemistry and have the required academic qualifications for these professional bodies. In addition, the Director responsible for authorising all deliverables has over 15 years' experience.

Summary of Key Pollutants Considered

- 3.5 For the operational phase of the Proposed Development, the main pollutants from road traffic with potential for local air quality impacts are nitrogen oxides (NO_x) and particulate matter (PM₁₀). Emissions of total NO_x from combustion sources comprise nitric oxide (NO) and NO₂. The NO oxidises in the atmosphere to form NO₂. The assessment of operational impacts therefore focuses on changes in NO₂ and PM₁₀ concentrations. The impact from fine particulate matter, known as PM_{2.5} (a subset of PM₁₀) concentrations has also been considered.

Figure 3.1 Types of Vehicle Emissions



Source: European Environment Agency (2016) Explaining Road Transport Emissions: A Non-technical Guide

- 3.6 For the construction phase of the Proposed Development the key pollutant is dust, covering both the PM₁₀ fraction that is suspended in the air that can be breathed, and the deposited dust that has fallen out of the air onto surfaces and which can potentially cause temporary annoyance effects.
- 3.7 Regarding exhaust emissions from construction-related vehicles (contractors' vehicles and Heavy Goods Vehicles (HGVs), diggers, and other diesel-powered vehicles), these are unlikely to have a significant impact on local air quality [8] except for large, long-term construction sites: the EPUK & IAQM Land-Use Planning & Development Control: Planning For Air Quality document [7] indicates that air quality assessments should include developments increasing annual average daily Heavy Duty Vehicle (HDV) traffic flows by more than 25 within or adjacent to an AQMA and more than 100 elsewhere. The aforementioned EPUK & IAQM thresholds are not expected to be

exceeded for any individual road during the construction phase of this project; therefore, construction-vehicle exhaust emissions have not been assessed specifically.

Construction Phase - Methodology

- 3.8 Dust is the generic term used to describe particulate matter in the size range 1-75 µm in diameter [11]. Particles greater than 75 µm in diameter are termed grit rather than dust. Dusts can contain a wide range of particles of different sizes. The normal fate of suspended (i.e. airborne) dust is deposition. The rate of deposition depends largely on the size of the particle and its density; together these influence the aerodynamic and gravitational effects that determine the distance it travels and how long it stays suspended in the air before it settles out onto a surface. In addition, some particles may agglomerate to become fewer, larger particles; whilst others react chemically.
- 3.9 The effects of dust are linked to particle size and two main categories are usually considered:
- PM₁₀ particles, those up to 10 µm in diameter, remain suspended in the air for long periods and are small enough to be breathed in and so can potentially impact on health; and
 - Dust, generally considered to be particles larger than 10 µm which fall out of the air quite quickly and can soil surfaces (e.g. a car, window sill, laundry). Additionally, dust can potentially have adverse effects on vegetation and fauna at sensitive habitat sites.
- 3.10 The IAQM Guidance on the assessment of dust from demolition and construction sets out 350 m as the distance from the site boundary and 50 m from the site traffic route(s) up to 500 m of the entrance, within which there could potentially be nuisance dust and PM₁₀ effects on human receptors. For sensitive ecological receptors, the corresponding distances are 50 m in both cases. (In this particular application, there are no ecological receptors within the distances and ecological effects have been scoped out). These distances are set to be deliberately conservative.
- 3.11 Concentration-based limit values and objectives have been set for the PM₁₀ suspended particle fraction, but no statutory or official numerical air quality criterion for dust annoyance has been set at a UK, European or World Health Organisation (WHO) level. Construction dust assessments have tended to be risk based, focusing on the appropriate measures to be used to keep dust impacts at an acceptable level.
- 3.12 The IAQM dust guidance aims to estimate the impacts of both PM₁₀ and dust through a risk-based assessment procedure. The IAQM dust guidance document states: *“The impacts depend on the mitigation measures adopted. Therefore the emphasis in this document is on classifying the risk of dust impacts from a site, which will then allow mitigation measures commensurate with that risk to be identified.”*
- 3.13 The IAQM dust guidance provides a methodological framework, but notes that professional judgement is required to assess effects: *“This is necessary, because the diverse range of projects*

that are likely to be subject to dust impact assessment means that it is not possible to be prescriptive as to how to assess the impacts. Also a wide range of factors affect the amount of dust that may arise, and these are not readily quantified.”

3.14 Consistent with the recommendations in the IAQM dust guidance, a risk-based assessment has been undertaken for the development, using the well-established source-pathway-receptor approach:

- The dust impact (the change in dust levels attributable to the development activity) at a particular receptor will depend on the magnitude of the dust source and the effectiveness of the pathway (i.e. the route through the air) from source to receptor.
- The effects of the dust are the results of these changes in dust levels on the exposed receptors, for example annoyance or adverse health effects. The effect experienced for a given exposure depends on the sensitivity of the particular receptor to dust. An assessment of the overall dust effect for the area as a whole has been made using professional judgement taking into account both the change in dust levels (as indicated by the Dust Impact Risk for individual receptors) and the absolute dust levels, together with the sensitivities of local receptors and other relevant factors for the area.

The detail of the dust assessment methodology is provided in Appendix A.

3.15 The dust risk categories that have been determined for each of the four activities (demolition, earthworks, construction and trackout) have been used to define the appropriate site-specific mitigation measures based on those described in the IAQM dust guidance. The guidance states that provided the mitigation measures are successfully implemented, the resultant effects of the dust exposure will normally be ‘not significant’.

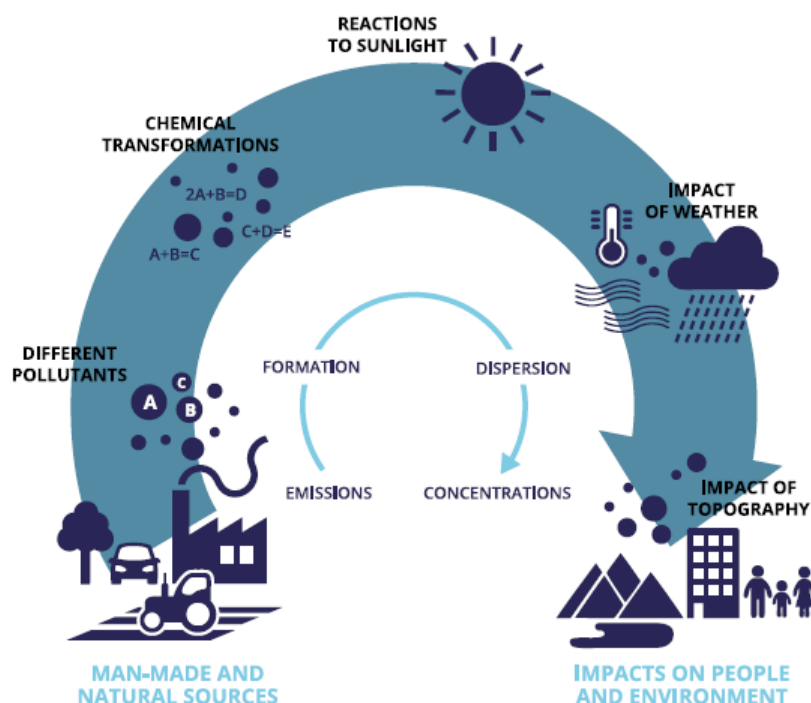
3.16 This assessment does not consider the air quality impacts of dust from any contaminated land or buildings. If contaminated land is identified on the Application Site, the impacts will be assessed in other technical discipline reports.

Operational Phase - Methodology

Atmospheric Dispersion Modelling of Pollutant Concentrations

3.17 In urban areas, pollutant concentrations are primarily determined by the balance between pollutant emissions that increase concentrations, and the ability of the atmosphere to reduce and remove pollutants by dispersion, advection, reaction and deposition. An atmospheric dispersion model is used as a practical way to simulate these complex processes; such a model requires a range of input data, which can include emissions rates, meteorological data and local topographical information. The model used and the input data relevant to this assessment are described in the following sub-sections.

Figure 3.2 Air Pollution: From Emissions to Exposure



Source: European Environment Agency (2016) Explaining Road Transport Emissions: A Non-technical Guide

- 3.18 The atmospheric pollutant concentrations in an urban area depend not only on local sources at a street scale, but also on the background pollutant level made up of the local urban-wide background, together with regional pollution and pollution from more remote sources brought in on the incoming air mass. This background contribution needs to be added to the fraction from the modelled sources, and is usually obtained from measurements or estimates of urban background concentrations for the area in locations that are not directly affected by local emissions sources. Background pollution levels are described in detail in Section 4.
- 3.19 The ADMS-Roads model has been used in this assessment to predict the air quality impacts from changes in traffic on the local road network. This is a version of the Atmospheric Dispersion Modelling System (ADMS), a formally validated model developed in the UK by Cambridge Environmental Research Consultants Ltd (CERC) and widely used in the UK and internationally for regulatory purposes.

Modelled Scenarios

- 3.20 The following scenarios were modelled:

- Without Development – without the Proposed Development in the first year that the development is expected to be fully operational, 2022; and

- With Development – with the Proposed Development in the first year that the development is expected to be fully operational, 2022.

Model Input Data

Traffic Flow Data

- 3.21 Baseline traffic data used in the assessment have been sourced from the Department for Transport (DfT). A TEMPro growth factor has been applied to the 2018 flows to obtain expected flows for the opening year of 2022. The traffic flows generated by the proposed development, as provided by the project's transport consultants, Mayer Brown Limited, have been added to the 2022 base flows to obtain a 'with development' scenario. As a conservative approach, the traffic flows generated by the proposed development have been added to all road links modelled. In reality, the generated traffic will be distributed over the local road network.
- 3.22 It has been assumed, following advice from RBC, that the site would be unoccupied in 2022 if the development does not go ahead. Mayer Brown has advised that the traffic flows generated by the proposed development are expected to be lower than the flows associated with the site's consented use. The approach to the assessment is thus considered to be highly conservative.
- 3.23 The traffic flow data provided for this assessment are summarised in Table 3.1. The modelled road links are illustrated in Figure 1.

Table 3.1 Traffic Data Used Within the Assessment

Road Link ID	Road Link Name	Speed (km.hr ⁻¹)	Daily Two-Way Vehicle Flow (2022)			
			Without Development		With Development	
			LDV	HDV	LDV	HDV
1	A329 Caversham Road	48	37353	1240	37527	1242
2	A329 Vastern Road	48	21949	633	22123	635
3	A4155 Caversham Road	48	28894	1224	29068	1226

Notes: km.hr⁻¹ = kilometres per hour

HDV = Heavy Duty Vehicle - vehicles greater than 3.5 t gross vehicle weight including buses

LDV = Light Duty Vehicle

- 3.24 The average speed on each road has been reduced by 10 km.hr⁻¹ to take into account the possibility of slow-moving traffic near junctions and at roundabouts in accordance with LAQM.TG16.

Vehicle Emission Factors

- 3.25 The modelling has been undertaken using Defra's 2019 emission factor toolkit (version 9.0) which draws on emissions generated by the European Environment Agency (EEA) COPERT 5 emission calculation tool.

Meteorological Data

3.26 ADMS-Roads requires detailed meteorological data as an input. The most representative observing station for the region of the study area that supplies all the data in the required format is Benson, approximately 19 km north-west of the Application Site. Meteorological data from that station for 2016 have been used within the dispersion model. The wind rose is presented in Figure 2.

Receptors

3.27 The air quality assessment predicts the impacts at locations that could be sensitive to any changes. For assessing human-health impacts, such sensitive receptors should be selected where the public is regularly present and likely to be exposed over the averaging period of the objective. LAQM.TG16 [9] provides examples of exposure locations and these are summarised in Table 3.2.

Table 3.2 Examples of Where Air Quality Objectives 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.	Building façades 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's façades), or any other location where public exposure is expected to be short-term.
Daily-mean	All locations where the annual-mean objective would apply, together with hotels. Gardens of residential properties.	Kerbside sites (as opposed to locations at the building's façade), or any other location where public exposure is expected to be short-term.
Hourly-mean	All locations where the annual and 24 hour mean would apply. Kerbside sites (e.g. pavements of busy shopping streets). Those parts of car parks, bus stations 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 1-hour or longer.	Kerbside sites where the public would not be expected to have regular access.

3.28 Representative sensitive receptors for this assessment have been selected at properties where pollutant concentrations and/or changes in pollutant concentrations are anticipated to be greatest, as listed in Table 3.3.

Table 3.3 Modelled Sensitive Receptors

ID	Description	x	y	z
Existing Receptors				
1	Malcolm Place	471177	173864	1.5
2	Caversham Rd 1	471283	174122	4.5
3	Vastern Rd	471392	174148	1.5
4	A4155 1	471283	174200	1.5
5	A4155 2	471292	174245	1.5
6	A4155 3	471115	174449	1.5
7	Caversham Rd 2	471098	173631	1.5
8	Caversham Rd 3	471116	173708	1.5
Proposed Receptors				
9	Proposed Ground Floor (Commercial)	471254	174034	1.5
10	Proposed First Floor (Residential)	471254	174034	6
11	Proposed Second Floor (Residential)	471254	174034	9
12	Proposed Third Floor (Residential)	471254	174034	12

3.29 The annual, daily and hourly-mean AQS objectives apply at the front and rear façades of all residential properties. The daily and hourly-mean AQS objectives only, apply at the ground floor of the proposed development (commercial use). The approaches used to predict the concentrations for these different averaging periods are described below.

Long-Term Pollutant Predictions

3.30 Annual-mean NO_x and PM₁₀ concentrations have been predicted at representative sensitive receptors using ADMS-Roads, then added to relevant background concentrations. Primary NO in the NO_x emissions is converted to NO₂ to a degree determined by the availability of atmospheric oxidants locally and the strength of sunlight. For road traffic sources, annual-mean NO₂ concentrations have been derived from the modelled road-related annual-mean NO_x concentration using Defra's calculator [12].

Short-Term Pollutant Predictions

3.31 In order to predict the likelihood of exceedances of the hourly-mean AQS objectives for NO₂ and the daily-mean AQS objective for PM₁₀, the following relationships between the short-term and the annual-mean values at each receptor have been considered.

Hourly-Mean AQS Objective for NO₂

3.32 Research undertaken in support of LAQM.TG16 has indicated that the hourly-mean limit value and objective for NO₂ is unlikely to be exceeded at a roadside location where the annual-mean

NO₂ concentration is less than 60 µg.m⁻³. The threshold of 60 µg.m⁻³ NO₂ has been used the guideline for considering a likely exceedance of the hourly-mean nitrogen dioxide objective.

Daily-Mean AQS Objective for PM₁₀

- 3.33 The number of exceedances of the daily-mean AQS objective for PM₁₀ of 50 µg.m⁻³ may be estimated using the relationship set out in LAQM.TG16:

*Number of Exceedances of Daily Mean of 50 µg.m⁻³ = -18.5 + 0.00145 * (Predicted Annual-mean PM₁₀)³ + 206 / (Predicted Annual-mean PM₁₀ Concentration)*

- 3.34 This relationship indicates that the daily-mean AQS objective for PM₁₀ is likely to be met if the predicted annual-mean PM₁₀ concentration is 31.8 µg.m⁻³ or less.
- 3.35 The daily mean objective is therefore not considered further within this assessment if the annual-mean PM₁₀ concentration is predicted to be less than 31.5 µg.m⁻³.

Fugitive PM₁₀ Emissions

- 3.36 Transport PM₁₀ emissions arise from both the tailpipe exhausts and from fugitive sources such as brake and tyre wear and re-suspended road dust. Improvements in vehicle technologies are reducing PM₁₀ exhaust emissions; therefore, the relative importance of fugitive PM₁₀ emissions is increasing. Current official vehicle emission factors for particulate matter include brake dust and tyre wear which studies suggest may account for approximately one-third of the total particulate emissions from road transport; but not re-suspended road dust (which remains unquantified.)

Significance Criteria for Development Impacts on the Local Area

- 3.37 The EPUK & IAQM Land-Use Planning & Development Control: Planning For Air Quality document [7] advises that:

"The significance of the effects arising from the impacts on air quality will depend on a number of factors and will need to be considered alongside the benefits of the development in question. Development under current planning policy is required to be sustainable and the definition of this includes social and economic dimensions, as well as environmental. Development brings opportunities for reducing emissions at a wider level through the use of more efficient technologies and better designed buildings, which could well displace emissions elsewhere, even if they increase at the development site. Conversely, development can also have adverse consequences for air quality at a wider level through its effects on trip generation."

- 3.38 When describing the air quality impact at a sensitive receptor, the change in magnitude of the concentration should be considered in the context of the absolute concentration at the sensitive receptor. Table 3.4 provides the EPUK & IAQM approach for describing the long-term air quality impacts at sensitive human-health receptors in the surrounding area.

Table 3.4 Impact Descriptors for Individual Sensitive Receptors

Long term average concentration at receptor in assessment year	% Change in concentration relative to Air Quality Assessment Level			
	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 than AQAL	Moderate	Substantial	Substantial	Substantial

1. AQAL = Air Quality Assessment Level, which may be an air quality objective, EU limit or target value, or an Environment Agency 'Environmental Assessment Level (EAL)'.

2. The table is intended to be used by rounding the change in percentage pollutant concentration to whole numbers, which then makes it clearer which cell the impact falls within. The user is encouraged to treat the numbers with recognition of their likely accuracy and not assume a false level of precision. Changes of 0%, i.e. less than 0.5% will be described as negligible.

3. The table is only designed to be used with annual mean concentrations.

4. Descriptors for individual receptors only; the overall significance is determined using professional judgement. For example, a 'moderate' adverse impact at one receptor may not mean that the overall impact has a significant effect. Other factors need to be considered.

5. When defining the concentration as a percentage of the AQAL, use the 'without scheme' concentration where there is a decrease in pollutant concentration and the 'with scheme;' concentration for an increase.

6. The total concentration categories reflect the degree of potential harm by reference to the AQAL value. At exposure less than 75% of this value, i.e. well below, the degree of harm is likely to be small. As the exposure approaches and exceeds the AQAL, the degree of harm increases. This change naturally becomes more important when the result is an exposure that is approximately equal to, or greater than the AQAL.

7. It is unwise to ascribe too much accuracy to incremental changes or background concentrations, and this is especially important when total concentrations are close to the AQAL. For a given year in the future, it is impossible to define the new total concentration without recognising the inherent uncertainty, which is why there is a category that has a range around the AQAL, rather than being exactly equal to it.

3.39 The human-health impact descriptors above apply at individual receptors. The EPUK & IAQM guidance states that the impact descriptors *"are not, of themselves, a clear and unambiguous guide to reaching a conclusion on significance. These impact descriptors are intended for application at a series of individual receptors. Whilst it maybe that there are 'slight', 'moderate' or 'substantial' impacts at one or more receptors, the overall effect may not necessarily be judged as being significant in some circumstances."*

3.40 Professional judgement by a competent, suitably qualified professional is required to establish the significance associated with the consequence of the impacts. This judgement is likely to take into account the extent of the current and future population exposure to the impacts and the influence and/or validity of any assumptions adopted during the assessment process.

Significance Criteria for New Population Exposure (Site Suitability)

- 3.41 The EPUK & IAQM guidance considers an exceedance of an air quality objective at a building façade to be significant adverse effect unless provision is made to reduce the resident's or occupant's exposure by some means.

Uncertainty

- 3.42 All air quality assessment tools, whether models or monitoring measurements, have a degree of uncertainty associated with the results. The choices that the practitioner makes in setting-up the model, choosing the input data, and selecting the baseline monitoring data will decide whether the final predicted impact should be considered a central estimate, or an estimate tending towards the upper bounds of the uncertainty range (i.e. tending towards worst-case).
- 3.43 The atmospheric dispersion model itself contributes some of this uncertainty, due to it being a simplified version of the real situation: it uses a sophisticated set of mathematical equations to approximate the complex physical and chemical atmospheric processes taking place as a pollutant is released and as it travels to a receptor. The predictive ability of even the best model is limited by how well the turbulent nature of the atmosphere can be represented.
- 3.44 Each of the data inputs for the model, listed earlier, will also have some uncertainty associated with them. Where it has been necessary to make assumptions, these have mainly been made towards the upper end of the uncertainty range informed by an analysis of relevant, available data.
- 3.45 The atmospheric dispersion model used for this assessment, ADMS Roads, has been validated by its supplier and is widely used by professionals in the UK and overseas. A site-specific verification (calibration) provides additional certainty and is particularly important when air quality levels are close to exceeding the objectives/limit values.
- 3.46 LAQM.TG16 requires that local authorities verify the results of any detailed modelling undertaken for the purposes of fulfilling their R&A duties. Model verification refers to the checks that are carried out on model performance at a local level. Modelled concentrations are compared with the results of monitoring. Where there is a disparity between modelled and monitored concentrations, the first step is to review the appropriateness of the data inputs to determine whether the performance of the model can be improved. Once reasonable efforts have been made to reduce the uncertainties in the data inputs, an adjustment may be established and applied to reduce any remaining disparity between modelled and monitored concentrations. No adjustment factor is deemed necessary where the modelled concentrations are within 25% of the monitored concentrations.
- 3.47 For the verification and adjustment of NO_x/NO₂ concentrations for R&A purposes, it is recommended that the comparison involves a combination of automatic and diffusion monitoring,

rather than a single automatic monitor. This is to ensure any adjustment factor derived is representative of all locations modelled and not unduly weighted towards the characteristics at a single site. Where only diffusion tubes are used for the model verification, the study should consider a broad spread of monitoring locations across the study area to provide sufficient information relating to the spatial variation in pollutant concentrations.

- 3.48 Local Authorities generally implement a broad spread of monitoring, particularly in areas that are known to be sensitive to changes in air quality. Consequently, Local Authorities are usually able to verify the models they use for R&A purposes; however for individual developments, there is less likely to be a broad range of monitoring locations within the relevant study area. Notwithstanding this, a small number of monitoring locations have been identified within the study area and a model verification study has been undertaken for the proposed development and is included at Appendix B.
- 3.49 The main components of uncertainty in the total predicted concentrations, made up of the background concentration and the modelled fraction, include those summarised in Table 3.5.

Table 3.5 Approaches to Dealing with Uncertainty used Within the Assessment

Concentration	Source of Uncertainty	Approach to Dealing with Uncertainty	Comments
Background Concentration	Characterisation of current baseline air quality conditions	The background concentration used within the assessment is the most conservative value from a comparison of measured and Defra mapped concentration estimate.	The background concentration is the major proportion of the total predicted concentration.
	Characterisation of future baseline air quality (i.e. the air quality conditions in the future assuming that the development does not proceed)	The future background concentration used in the assessment is the same as the current background concentration and no reduction has been assumed. This is a conservative assumption as, in reality, background concentrations are likely to reduce over time as cleaner vehicle technologies form an increasing proportion of the fleet.	The conservative assumptions adopted ensure that the background concentration used within the model contributes to the result being towards the top of the uncertainty range, rather than a central estimate.
Fraction from Modelled Sources	Traffic speed estimates	The average speed has been reduced in congested areas to take account of slow-moving and queuing traffic.	The modelled fraction is a minor proportion of the total predicted concentration.
	Road-related emission factors – projection to future years	The most recently published emission factors have been used within the modelling and these are based on the current and best understanding of the variation in emission factors in future years.	The modelled fraction is likely to contribute to the result being between a central estimate and the top of the uncertainty range.

Concentration	Source of Uncertainty	Approach to Dealing with Uncertainty	Comments
	Meteorological Data	Uncertainties arise from any differences between the conditions at the met station and the development site, and between the historical met years and the future years. These have been minimised by using meteorological data collated at a representative measuring site. The model has been run for a full year of meteorological conditions. This means that the conditions in 8,760 hours have been considered in the assessment.	
	Receptors	Receptor locations have been identified where concentrations are highest or where the greatest changes are expected.	
	Dispersion Modelling	The model predictions have been compared with monitored concentrations. The model has been shown to be performing well, and there is no requirement to adjust the model output. Nevertheless, a sensitivity test has been undertaken whereby the model outputs have been adjusted using a factor of 2.4.	

3.50 The analysis of the component uncertainties indicates that, overall, the predicted total concentration is likely to be towards the top of the uncertainty range rather than being a central estimate. The actual concentrations that will be found when the development is operational are unlikely to be higher than those presented within this report and are more likely to be lower.

4 Baseline Air Quality Conditions

Overview

- 4.1 The background concentration often represents a large proportion of the total pollution concentration, so it is important that the background concentration selected for the assessment is realistic. National Planning Practice Guidance and EPUK & IAQM guidance highlight public information from Defra and local monitoring studies as potential sources of information on background air quality. LAQM.TG16 recommends that Defra mapped concentration estimates are used to inform background concentrations in air quality modelling and states that: *“Where appropriate these data can be supplemented by and compared with local measurements of background, although care should be exercised to ensure that the monitoring site is representative of background air quality”*.
- 4.2 For this assessment, the background air quality has been characterised by drawing on information from the following public sources:
- Defra maps [13], which show estimated pollutant concentrations across the UK in 1 km grid squares; and
 - published results of local authority Review and Assessment (R&A) studies of air quality, including local monitoring and modelling studies.
- 4.3 A detailed description of how the baseline air quality has been derived for this Proposed Development site is summarised in the following paragraphs.

Review and Assessment Process

- 4.4 The Proposed Development is located within the Reading AQMA, which covers the town centre and major radial routes around Reading. The AQMA has been designated due to high levels of NO₂ pollution from road traffic. The Application Site is located within the designated AQMA.
- 4.5 RBC prepared an action plan in 2009 setting the measures it intends to implement to improve air quality within the AQMA. The action plan was updated in 2016. The measure relevant to this assessment is as follows:

“We will ensure through the planning process that future development does not result in any further deterioration of air quality and where possible, results in an improvement in overall environmental quality.”

Local Urban Background Monitoring

- 4.6 Monitors at urban background locations measure concentrations away from the local influence of emission sources and are therefore broadly representative of residential areas within large conurbations. Monitoring at local urban background locations is considered an appropriate source of data for the purposes of describing baseline air quality for this Proposed Development site.
- 4.7 There is one local monitoring station where urban background concentrations are measured using a continuous automatic instrument. NO₂, PM₁₀ and PM_{2.5} concentrations are measured at the Reading Automatic Urban and Rural Network (AURN) urban background monitoring location. The most recently measured annual-mean concentrations are presented in Table 4.1.

Table 4.1 Automatically Monitored Urban Background Annual-Mean Concentrations

Monitor Name	Approx. Distance from the Application Site (km)	Pollutant	Concentration (µg.m ⁻³)							Average (2013 – 2018)	Average (2016 – 2018)
			2013	2014	2015	2016	2017	2018			
Reading AURN	2.3	NO ₂	27	27	22	34	29	26	27.5	29.7	
		PM ₁₀	16	14	12	13	12	13	13.3	12.7	
		PM ₂₅	10	10	7	9	10	7	8.8	8.7	

Defra Mapped Concentration Estimates

- 4.8 Defra's total annual-mean NO₂ concentration estimates have been collected for the 1 km grid squares of the monitoring sites and the Proposed Development and are summarised in Table 4.2.

Table 4.2 Defra Mapped Annual-Mean Background NO₂ Concentration Estimates

Monitor Name	Approx. Distance from the Application Site (km)	Concentration (µg.m ⁻³)	
		Range of Monitored	Estimated Defra Mapped
Reading AURN	2.3	22 - 34	24.4
Application Site	-	-	24.2

- 4.9 Similarly, the Defra total annual-mean PM₁₀ concentration estimates have been collected for the grid square of the monitoring sites and the Proposed Development and are summarised in Table 4.3.

Table 4.3 Defra Mapped Annual-Mean Background PM₁₀ Concentration Estimates

Monitor Name	Approx. Distance from the Application Site (km)	Concentration (µg.m ⁻³)	
		Range of Monitored	Estimated Defra Mapped
Reading AURN	2.3	12 - 16	16.9
Application Site	-	-	17.1

4.10 Similarly, the Defra total annual-mean PM_{2.5} concentration estimates have been collected for the grid square of the monitoring sites and the Proposed Development and are summarised in Table 4.4.

Table 4.4 Defra Mapped Annual-Mean Background PM_{2.5} Concentration Estimates

Monitor Name	Approx. Distance from the Application Site (km)	Concentration (µg.m ⁻³)	
		Range of Monitored	Estimated Defra Mapped
Reading AURN	2.3	7 - 10	11.8
Application Site	-	-	12.0

Appropriate Background Concentrations for the Development Site

- 4.11 For NO₂, the Defra mapped background concentration estimate is higher than the concentration measured in 2015 at the Reading AURN site but below the measured concentration in all other years. This indicates that the use of Defra data would not be conservative. The average concentration monitored between 2016 and 2018 is 29.7 µg.m⁻³, which is higher than the two most recently monitored concentrations, the average concentration monitored between 2013 and 2018, and the Defra estimate for the Application Site. To ensure the assessment is conservative, the background annual-mean NO₂ concentration has been derived from this average monitored concentration.
- 4.12 For PM₁₀ and PM_{2.5}, the Defra mapped background concentration estimate is higher than the range of results from monitoring. The background annual-mean PM₁₀ and PM_{2.5} concentrations at the Application Site have been derived from the estimated Defra mapped concentrations.
- 4.13 Historically the view has been that background traffic-related NO₂ concentrations in the UK would reduce over time, due to the progressive introduction of improved vehicle technologies and

increasingly stringent limits on emissions. However, the results of recent monitoring across the UK suggest that background annual-mean NO₂ concentrations have not decreased in line with expectations. Inspection of the results of local monitoring presented here indicates that there is a recent downward trend for concentrations of NO₂ in the vicinity of the Application Site.

- 4.14 To ensure that the assessment presents conservative results, no reduction in the background has been applied for future years.
- 4.15 Table 4.5 summarises the annual-mean background concentrations for NO₂, PM₁₀ and PM_{2.5} used in this assessment.

Table 4.5 Summary of Background Annual-Mean (Long-term) Concentrations used in the Assessment

Pollutant	Data Source	Concentration (µg.m ⁻³)
NO ₂	Reading AURN (Average 2016-2018)	29.7
PM ₁₀	Defra mapped	17.1
PM _{2.5}		12.0

5 Assessment of Construction-Phase Air Quality Impacts

Construction Dust

- 5.1 Whilst no detailed construction phase information is currently available, the type of activities that could cause fugitive dust emissions are: demolition; earthworks; handling and disposal of spoil; wind-blown particulate material from stockpiles; handling of loose construction materials; and movement of vehicles, both on and off site.
- 5.2 The level and distribution of construction dust emissions will vary according to factors such as the type of dust, duration and location of dust-generating activity, weather conditions and the effectiveness of suppression methods.
- 5.3 The main effect of any dust emissions, if not mitigated, could be annoyance due to soiling of surfaces, particularly windows, cars and laundry. However, it is normally possible, by implementation of proper control, to ensure that dust deposition does not give rise to significant adverse effects, although short-term events may occur (for example, due to technical failure or exceptional weather conditions). The following assessment, using the IAQM methodology, predicts the risk of dust impacts and the level of mitigation that is required to control the residual effects to a level that is “not significant”.

Risk of Dust Impacts

Source

- 5.4 The volume of the buildings on site that would be demolished would be below 20,000 m³, and so the dust emission magnitude for the demolition phase is classified, using the IAQM dust guidance, as small.
- 5.5 The site area is below 2,500 m², and so the dust emission magnitude for the earthworks phase is classified as small.
- 5.6 The total volume of the buildings to be constructed would be below 25,000 m³, and so the dust emission magnitude for the construction phase is classified as small.
- 5.7 Assuming that the maximum number of outwards movements in any one day is less than 10 HDVs, the dust emission magnitude for trackout would be classified as small.

Table 5.1 Dust Emission Magnitude for Demolition, Earthworks, Construction and Trackout

Demolition	Earthworks	Construction	Trackout
Small	Small	Small	Small

Pathway and Receptor - Sensitivity of the Area

5.8 All demolition, earthworks and construction activities are assumed to occur within the site boundary. As such, receptors at distances within 20 m, 50 m, 100 m, 200 m and 350 m of the site boundary have been identified and are illustrated in Figure 3. The sensitivity of the area has been classified and the results are provided in Table 5.2 below.

Table 5.2 Sensitivity of the Surrounding Area for Demolition, Earthworks and Construction

Potential Impact	Sensitivity of the Surrounding Area	Reason for Sensitivity Classification
Dust Soiling	Medium	Approx. 4 residential properties on Northfield Road to the west of the site. 1 – 10 high sensitivity receptors located within 20 m of the site boundary (Table A.4)
Human Health	Low	Approx. 4 residential properties on Northfield Road to the west of the site. Background PM ₁₀ concentrations for the assessment = 17.1 µg.m ⁻³ 1 – 10 high sensitivity receptors located within 20 m of the site boundary and PM ₁₀ concentrations below 24 µg.m ⁻³ (Table A.5)

5.9 The Dust Emission Magnitude for trackout is classified as small and trackout may occur on roads up to 50 m from the site. The major routes within 50 m of the site are Northfield Road and Caversham Road. The sensitivity of the area has been classified and the results are provided in Table 5.3

Table 5.3 Sensitivity of the Surrounding Area for Trackout

Potential Impact	Sensitivity of the Surrounding Area	Reason for Sensitivity Classification
------------------	-------------------------------------	---------------------------------------

Dust Soiling	Medium	Between 1 and 10 residential properties aligning Northfield Road. 1 – 10 high sensitivity receptors located within 20 m of the roads (Table A.4)
Human Health	Low	Between 1 and 10 residential properties aligning Northfield Road. Background PM ₁₀ concentrations for the assessment = 17.1 µg.m ⁻³ 1 – 10 high sensitivity receptors located within 20 m of the roads and PM ₁₀ concentrations below 24 µg.m ⁻³ (Table A.5)

Overall Dust Risk

5.10 The Dust Emission Magnitude has been considered in the context of the Sensitivity of the Area to give the Dust Impact Risk. Table 5.4 summarises the Dust Impact Risk for the four activities.

Table 5.4 Dust Impact Risk for Demolition, Earthworks, Construction and Trackout

Source	Demolition	Earthworks	Construction	Trackout
Dust Soiling	Low	Low	Low	Low
Human Health	Negligible	Negligible	Negligible	Negligible
Overall Risk	Low	Low	Low	Low

5.11 Taking the site as a whole, the overall risk is deemed to be low. The mitigation measures appropriate to a level of risk for the site as a whole and for each of the phases are set out in Section 7.

5.12 Provided this package of mitigation measures is implemented, the residual construction dust effects will not be significant. The IAQM dust guidance states that “*For almost all construction activity, the aim should be to prevent significant effects on receptors through the use of effective mitigation. Experience shows that this is normally possible. Hence the residual effect will normally be ‘not significant’.*” The IAQM dust guidance recommends that significance is only assigned to the effect after the activities are considered with mitigation in place.

6 Assessment of Operational-Phase Air Quality Impacts

Assessment of Air Quality Impacts on Surrounding Area

6.1 This section of the report summarises the future operational-phase air quality impacts of the key pollutants associated with the development traffic of the proposed scheme.

Nitrogen Dioxide (NO₂)

6.2 Table 6.1 presents the annual-mean NO₂ concentrations predicted at the façades of existing receptors.

Table 6.1 Predicted Annual-Mean NO₂ Impacts at Existing Receptors

Receptor ID	Concentration (µg.m ⁻³)		With - Without Dev as % of the AQS Objective	Impact Descriptor
	Without Development	With Development		
1	35.7	35.7	0	Negligible
2	34.2	34.2	0	Negligible
3	33.9	33.9	0	Negligible
4	35.1	35.1	0	Negligible
5	35.0	35.0	0	Negligible
6	33.4	33.4	0	Negligible
7	34.1	34.1	0	Negligible
8	35.1	35.1	0	Negligible
Maximum	35.7	35.7	0	-
Minimum	33.4	33.4	0	-

6.3 Predicted annual-mean NO₂ concentrations in the opening year at the façades of the existing receptors are below the AQS objective for NO₂. When the magnitude of change is considered in the context of the absolute concentrations, the impact descriptor is 'negligible' at all receptors.

6.4 As all predicted annual-mean NO₂ concentrations are below 60 µg.m⁻³, the hourly-mean objective for NO₂ is likely to be met at all receptors. The short-term NO₂ impact can be considered 'negligible' and is not considered further within this assessment.

6.5 Overall, the impact on the surrounding area from NO₂ is considered to be 'negligible', using the criteria adopted for this assessment and based on professional judgement.

Particulate Matter (PM₁₀)

6.6 Table 6.2 presents the annual-mean PM₁₀ concentrations predicted at the façades of existing receptors.

Table 6.2 Predicted Annual-Mean PM₁₀ Impacts at Existing Receptors

Receptor ID	Concentration (µg.m ⁻³)		With - Without Dev as % of the AQS Objective	Impact Descriptor
	Without Development	With Development		
1	18.7	18.7	0	Negligible
2	18.2	18.2	0	Negligible
3	18.1	18.1	0	Negligible
4	18.5	18.5	0	Negligible
5	18.5	18.5	0	Negligible
6	18.0	18.0	0	Negligible
7	18.2	18.2	0	Negligible
8	18.4	18.4	0	Negligible
Maximum	18.7	18.7	0	-
Minimum	18.0	18.0	0	-

6.7 Predicted annual-mean PM₁₀ concentrations in the opening year at the façades of the existing receptors are well below the AQS objective for PM₁₀. When the magnitude of change is considered in the context of the absolute concentrations, the impact descriptor is categorised as 'negligible' at all receptors.

6.8 As all predicted annual mean PM₁₀ concentrations are below 31.5 µg.m⁻³, the daily-mean PM₁₀ objective is expected to be met at all receptors and the short-term PM₁₀ impact is not considered further within this assessment.

6.9 Overall, the impact on the surrounding area from PM₁₀ is considered to be 'negligible', using the criteria adopted for this assessment and based on professional judgement.

Fine Particulate Matter (PM_{2.5})

6.10 Table 6.3 presents the annual-mean PM_{2.5} concentrations predicted at the façades of existing receptors.

Table 6.3 Predicted Annual-Mean PM_{2.5} Impacts at Existing Receptors

Receptor ID	Concentration (µg.m ⁻³)		With - Without Dev as % of the AQS Objective	Impact Descriptor
	Without Development	With Development		
1	12.9	12.9	0	Negligible
2	12.6	12.6	0	Negligible
3	12.6	12.6	0	Negligible
4	12.8	12.8	0	Negligible
5	12.8	12.8	0	Negligible
6	12.5	12.5	0	Negligible
7	12.6	12.6	0	Negligible
8	12.8	12.8	0	Negligible
Maximum	12.9	12.9	0	-
Minimum	12.5	12.5	0	-

AQS objective = 25 µg.m⁻³

- 6.11 Predicted annual-mean PM_{2.5} concentrations in the opening year at the façades of the existing receptors are below the AQS objective for PM_{2.5} at all receptors. When the magnitude of change is considered in the context of the absolute concentrations, the impact descriptor is categorised as 'negligible' at all receptors.
- 6.12 Overall, the impact on the surrounding area from PM_{2.5} is considered to be 'negligible', using the criteria adopted for this assessment and based on professional judgement.

Assessment of New Population Exposure (Site Suitability)

- 6.13 This section of the report summarises the operational-phase air quality impacts on future occupants of the development from their exposure to the prevailing levels of air pollution, which can be a factor in the suitability of the site for its proposed uses.
- 6.14 Table 6.4 presents the annual-mean NO₂, PM₁₀ and PM_{2.5} concentrations predicted at the façades of proposed receptors.

Table 6.4 Predicted Annual-Mean NO₂, PM₁₀ and PM_{2.5} Concentrations (µg.m⁻³) at Proposed Receptors

Receptor	NO ₂	PM ₁₀	PM _{2.5}
Proposed Ground Floor (Commercial)	37.0	18.9	13.0
Proposed First Floor (Residential)	33.6	18.1	12.5

Receptor	NO ₂	PM ₁₀	PM _{2.5}
Proposed Second Floor (Residential)	32.0	17.7	12.3
Proposed Third Floor (Residential)	31.2	17.5	12.2
Maximum (All Floors)	37.0	18.9	13.0
Maximum (Residential Floors Only)	33.6	18.1	12.5

- 6.15 The long-term and short-term objectives apply at the first floor and above of the proposed development. The short-term objectives, only, apply at the ground floor of the proposed development.
- 6.16 The maximum predicted annual-mean NO₂ concentration is 37.0 µg.m⁻³ at the proposed commercial receptor (ground floor) and 33.6 µg.m⁻³ at proposed residential receptors, i.e. below the annual-mean AQS objective of 40 µg.m⁻³ at all receptors. As the annual-mean NO₂ concentrations are predicted to be less than 60 µg.m⁻³, the hourly-mean AQS objective is expected to be met.
- 6.17 The maximum predicted annual-mean PM₁₀ concentration is 18.9 µg.m⁻³, well below the annual-mean AQS objective of 40 µg.m⁻³ at all receptors. Furthermore, as the annual-mean PM₁₀ concentration is predicted to be less than 31.5 µg.m⁻³, the daily-mean AQS objective for this pollutant is expected to be met.
- 6.18 The maximum predicted annual-mean PM_{2.5} concentration is 13.0 µg.m⁻³. Predicted concentrations at all receptors are below the annual-mean AQS objective of 25 µg.m⁻³.

Significance of Effects

- 6.19 It is generally considered good practice that, where possible, an assessment should communicate effects both numerically and descriptively. Professional judgement by a competent, suitably qualified professional is required to establish the significance associated with the consequence of the impacts.
- 6.20 The impacts predicted at individual receptors and the geographical extent over which such impacts occur, can be used to inform the judgement on the impact on the surrounding area as a whole, and whether the resulting overall effect is significant or not. The IAQM guidance states, *"Whilst it may be that there are 'slight', 'moderate', or 'substantial' impacts at one or more receptors, the overall effect may not necessarily be judged as being significant in some circumstances."* and *"...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."*

- 6.21 The results of the modelling indicate that with the development, the predicted NO₂, PM₁₀ and PM_{2.5} concentrations at existing receptors are below the relevant long and short-term AQS objectives. When the magnitude of change in annual-mean NO₂, PM₁₀ and PM_{2.5} concentrations is considered in the context of the absolute predictions, the air quality impacts of the development on existing receptors are categorised as 'negligible'. Taking into account the geographical extent of the impacts predicted in this study, the overall impact of the development on the surrounding area as a whole is considered to be 'negligible', using the descriptors adopted for this assessment.
- 6.22 The AQS objectives for NO₂, PM₁₀ and PM_{2.5} are likely to be met at the facades of the Proposed Development. On that basis, future occupants of the development should be exposed to acceptable air quality and the site is deemed suitable for its proposed future in this respect.
- 6.23 Using professional judgement, the resulting air quality effect is considered to be 'not significant' overall.

Sensitivity and Uncertainty

- 6.24 Section 3 provided an analysis of the sources of uncertainty in the results of the assessment. The conclusion of that analysis was that, overall, the predicted total concentration is likely to be towards the top of the uncertainty range rather than being a central estimate. The actual concentrations that will be found when the development is operational are unlikely to be higher than those presented within this report and are more likely to be lower.
- 6.25 The impacts at existing receptors are shown to be not significant even for this conservative scenario. Similarly, the predicted pollutant concentrations at proposed receptors are below the relevant AQS objectives. In practice, the impacts at sensitive receptors are likely to be lower than those reported in this conservative assessment. Nevertheless, a sensitivity analysis has been undertaken, as detailed in Appendix C. The impacts remain negligible at existing receptors, and the relevant air quality objectives are met at proposed receptors.

7 Mitigation

Mitigation During Construction

- 7.1 The IAQM dust guidance lists mitigation measures for low, medium and high dust risks.
- 7.2 As summarised in Table 5.4, the predicted Dust Impact Risk is classified as low for Demolition, Earthworks, Construction and Trackout. The general site measures described as 'highly recommended' for low risks are listed below. The 'highly recommended' measures for low risk demolition sites are also listed. There are no 'highly recommended' measures for low risk earthworks, construction or trackout.

Communications
• Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager. • Display the head or regional office contact information
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.
Monitoring
• Carry out regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100 m of site boundary. • 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.
Preparing and maintaining the site
• Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible. Use screening intelligently where possible – e.g. locating site offices between potentially dusty activities and the receptors. • Erect solid screens or barriers around the site boundary. • Avoid site runoff of water or mud.
Operating vehicle/machinery and sustainable travel
• Ensure all vehicles switch off 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.
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. • Use enclosed chutes, conveyors and covered skips, where practicable. • Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.
Waste management

• Avoid bonfires and burning of waste materials.
Low risk measures specific to demolition
• Ensure effective water suppression is used during demolition operations. Hand held sprays are more effective than hoses attached to equipment as the water can be directed to where it is needed. In addition high volume water suppression systems, manually controlled, can produce fine water droplets that effectively bring the dust particles to the ground. • Avoid explosive blasting, using appropriate manual or mechanical alternatives. • Bag and remove any biological debris or damp down such material before demolition.

7.3 The IAQM dust guidance states that with the recommended dust mitigation measures in place the residual effect will normally be “*not significant*”, and recommends the mitigation is secured by for example planning conditions, a legal obligation, or by legislation.

Mitigation for the Operational Impact of the Development on the Surrounding Area

7.4 When the change in concentration at existing sensitive receptors is considered in the context of the absolute concentration, the overall air quality impact on the surrounding area as a whole is categorised as “negligible” and the resulting effect is considered to be “not significant”. On that basis, no mitigation measures are considered necessary.

Mitigation for New Population Exposure (Site Suitability)

7.5 The predicted pollutant concentrations at proposed sensitive receptors are below the relevant AQS objectives. As such, the air quality effect of exposure on future occupants is considered to be “not significant”. On that basis, no mitigation measures are considered necessary.

8 Conclusions

- 8.1 This assessment has considered dust effects during the construction phase and the air quality impacts during the operational phase of the proposed residential and commercial development at 71 - 73 Caversham Road in Reading.
- 8.2 Impacts during construction, such as dust generation and plant vehicle emissions, are predicted to be of short duration and only relevant during the construction phase. The results of the risk assessment of construction dust impacts undertaken using the IAQM dust guidance, indicates that before the implementation of mitigation and controls, the risk of dust impacts will be low. Implementation of the highly-recommended mitigation measures described in the IAQM construction dust guidance should reduce the residual dust effects to a level categorised as “*not significant*”.
- 8.3 Regarding the operational impact of the proposed development on the surrounding area, detailed atmospheric dispersion modelling has been undertaken for the first year in which the development is expected to be fully operational, 2022. The operational impact of the proposed development on existing receptors in the local area is predicted to be ‘negligible’ taking into account the changes in pollutant concentrations and absolute levels. Using the criteria adopted for this assessment together with professional judgement, the overall impact on the area as a whole is described as ‘negligible’.
- 8.4 Regarding suitability of air quality at the site for introducing new occupants, pollutant concentrations at the façades of proposed residential receptors are predicted to be within the relevant health-based air quality objectives. On that basis, future occupants of the Caversham Road development should be exposed to acceptable air quality and the site is deemed suitable for its proposed future use in this respect.
- 8.5 Using professional judgement, the resulting air quality effect of the proposed development is considered to be ‘not significant’ overall.
- 8.6 At the heart of the NPPF is a presumption in favour of sustainable development, subject to caveats where a plan or project affects a habitats site. For determining planning applications, this means approving development proposals if they accord with the local development plan, unless material considerations indicate otherwise. If the development plan is absent, silent or the policies are out of date, then planning permission should be granted unless any adverse impacts would significantly outweigh the benefits, or specific policies in the NPPF indicate development should be restricted.
- 8.7 The NPPG advises that in considering planning permission, the relevant question for air quality is “will the proposed development (including mitigation) lead to an unacceptable risk from air pollution, prevent sustained compliance with EU limit values or national objectives for pollutants

or fail to comply with the requirements of the Habitats Regulations?” The proposed development will not.

- 8.8 The Caversham Road development does not, in air quality terms, conflict with national or local policies, or with measures set out in RBC’s Air Quality Action Plan. There are no constraints to the development in the context of air quality.

Glossary

AADT	Annual Average Daily Traffic Flow
ADMS	Atmospheric Dispersion Modelling System
AQMA	Air Quality Management Area
AQS	Air Quality Strategy
Deposited Dust	Dust that has settled out onto a surface after having been suspended in air
DMP	Dust Management Plan
Dust	Solid particles suspended in air or settled out onto a surface after having been suspended in air
Effect	The consequences of an impact, experienced by a receptor
EPUK	Environmental Protection UK
HDV	Heavy Duty Vehicle
HGV	Heavy Goods Vehicle
IAQM	Institute of Air Quality Management
Impact	The change in atmospheric pollutant concentration and/or dust deposition. A scheme can have an 'impact' on atmospheric pollutant concentration but no effect, for instance if there are no receptors to experience the impact
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
R&A	Review and Assessment
Receptor	A person, their land or property and ecologically sensitive sites that may be affected by air quality
Risk	The likelihood of an adverse event occurring
Trackout	The transport of dust and dirt from the construction/demolition site onto the public road network, where it may be deposited and then re-suspended by vehicles using the network

Figures



- Proposed Receptors
- Existing Receptors
- Modelled Roads
- Approx Site Boundary

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Project: 71 – 73 Caversham Road, Reading

Job Ref: JAR11227

File location: N/A

Date: 02/09/2019

Rev: 0

Drawn: RC

Checked: KB

Figure 1: Modelled Roads and Receptors

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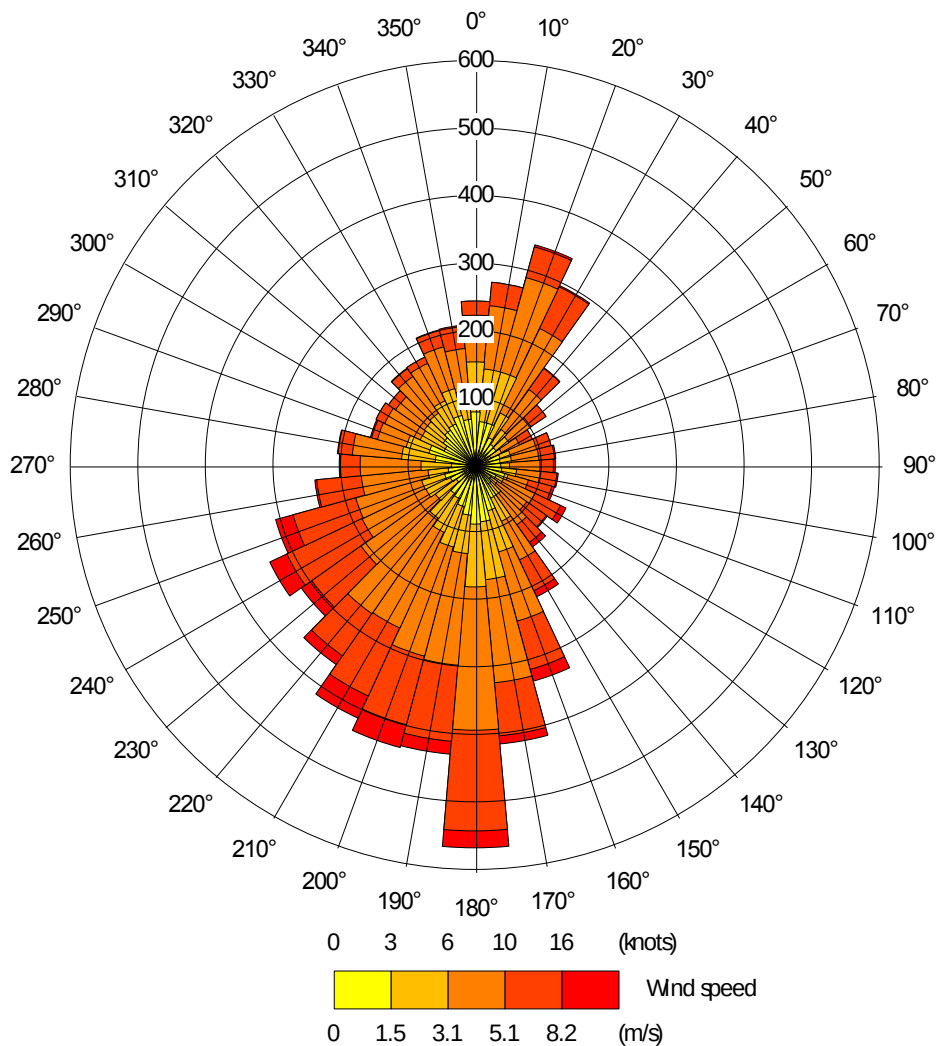


Figure 2: Windrose – Benson, 2016

Project Number	JAR11227	Project Title	71 – 73 Caversham Road, Reading		
Client:	S2 Estates Limited	Rev :	0	Drawn By:	RC
		Date:	02/09/2019	Checked By:	KB
File location:	N/A			 MAKING COMPLEX EASY 6-7 Lovers Walk Brighton East Sussex BN1 6AH T 01273 546800 F 01273 546801 E rpsbn@rpsgroup.com W rpsgroup.com rpsgroup.com/uk	
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Job Ref: JAR11227

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Date: 09/10/2019

Rev: Rev 1

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Checked: KB

Figure 3: Construction Dust Assessment

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Appendices

Appendix A: Detailed Construction Dust Assessment Methodology

Source

- A.1 The IAQM dust guidance gives examples of the dust emission magnitudes for demolition, earthworks and construction activities and trackout. These example dust emission magnitudes are based on the site area, building volume, number of HDV movements generated by the activities and the materials used. These example magnitudes have been combined with details of the period of construction activities to provide the ranking for the source magnitude that is set out in Table A.1.

Table A.1 Risk Allocation – Source (Dust Emission Magnitude)

Features of the Source of Dust Emissions	Dust Emission Magnitude
Demolition - building over 50,000 m³, potentially dusty construction material (e.g. concrete), on-site crushing and screening, demolition activities > 20 m above ground level. Earthworks – total site area over 10,000 m², potentially dusty soil type (e.g. clay), >10 heavy earth moving vehicles active at any one time, formation of bunds > 8 m in height, total material moved > 100,000 tonnes. Construction - total building volume over 100,000 m³, activities include piling, on-site concrete batching, sand blasting. Period of activities more than two years. Trackout – 50 HDV outwards movements in any one day, potentially dusty surface material (e.g. High clay content), unpaved road length > 100 m.	Large
Demolition - building between 20,000 to 50,000 m³, potentially dusty construction material and demolition activities 10 - 20 m above ground level. Earthworks – total site area between 2,500 to 10,000 m², moderately dusty soil type (e.g. silt), 5 – 10 heavy earth moving vehicles active at any one time, formation of bunds 4 - 8 m in height, total material moved 20,000 to 100,000 tonnes. Construction - total building volume between 25,000 and 100,000 m³, use of construction materials with high potential for dust release (e.g. concrete), activities include piling, on-site concrete batching. Period of construction activities between one and two years. Trackout – 10 - 50 HDV outwards movements in any one day, moderately dusty surface material (e.g. High clay content), unpaved road length 50 – 100 m.	Medium
Demolition - building less than 20,000 m³, construction material with low potential for dust release (e.g. metal cladding or timber), demolition activities < 10 m above ground, demolition during winter months. Earthworks – total site area less than 2,500 m². 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 winter months. Construction - total building volume below 25,000 m³, use of construction materials with low potential for dust release (e.g. metal cladding or timber). Period of construction activities less than one year.	Small

Features of the Source of Dust Emissions	Dust Emission Magnitude
Trackout – < 10 HDV outwards movements in any one day, surface material with low potential for dust release, unpaved road length < 50 m.	

Pathway and Receptor - Sensitivity of the Area

- A.2 Pathway means the route by which dust and particulate matter may be carried from the source to a receptor. The main factor affecting the pathway effectiveness is the distance from the receptor to the source. The orientation of the receptors to the source compared to the prevailing wind direction is a relevant risk factor for long-duration construction projects; however, short-term construction projects may be limited to a few months when the most frequent wind direction might be quite different, so adverse effects can potentially occur in any direction from the site.
- A.3 As set out in the IAQM dust guidance, a number of attempts have been made to categorise receptors into high, medium and low sensitivity categories; however there is no unified sensitivity classification scheme that covers the quite different potential effects on property, human health and ecological receptors.
- A.4 Table A.2 and Table A.3 sets out the IAQM basis for categorising the sensitivity of people and property to dust and PM₁₀ respectively.

Table A.2 Sensitivities of People and Property Receptors to Dust

Receptor	Sensitivity
Principles:- • 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. Indicative Examples:- • Dwellings. • Museums and other culturally important collections. • Medium and long-term car parks and car showrooms.	High
Principles:- • 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.	Medium

Receptor	Sensitivity
Indicative Examples:- • Parks. • Places of work.	
Principles:- • 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. Indicative Examples:- • Playing fields, farmland (unless commercially-sensitive horticultural). • Footpaths and roads. • Short-term car parks.	Low

Table A.3 Sensitivities of People and Property Receptors to PM₁₀

Receptor	Sensitivity
Principles:- • Locations where members of the public are exposed over a time period relevant to the air quality objective (in the case of the 24-hour objective for PM₁₀, a relevant location would be one where individuals may be exposed for eight hours or more in a day). Indicative Examples:- ▪ Residential properties. ▪ Schools, hospitals and residential care homes.	High
Principles:- • Locations where the people exposed are workers and exposure is over a time period relevant to the air quality objective (in the case of the 24-hour objective for PM₁₀, a relevant location would be one where individuals may be exposed for eight hours or more in a day). Indicative Examples:- ▪ Office and shop workers (but generally excludes workers occupationally exposed to PM₁₀ as protection is covered by Health and Safety at Work legislation).	Medium
Principles:- • Locations where human exposure is transient exposure. Indicative Examples:- • Public footpaths. • Playing fields, parks. • Shopping streets.	Low

A.5 The IAQM methodology combines consideration of the pathway and receptor to derive the 'sensitivity of the area'. Table A.4 and Table A.5 show how the sensitivity of the area has been derived for this assessment.

Table A.4 Sensitivity of the Area to Dust Soiling Effects on People and Property

Receptor Sensitivity	Number of Receptors ^a	Distance from the Source (m) ^b			
		<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

The sensitivity of the area has been derived for demolition, construction, earthworks and trackout.

a The total number of receptors within the stated distance has been estimated. Only the highest level of area sensitivity from the table has been recorded.

b For trackout, the distances have been measured from the side of the roads used by construction traffic. Without site-specific mitigation, trackout may occur from roads up to 500 m from large sites, 200 m from medium sites and 50 m from small sites, as measured from the site exit. The impact declines with distance from the site, and trackout impacts have only been considered up to 50 m from the edge of the road.

Table A.5 Sensitivity of the Area to Human Health Impacts

Receptor Sensitivity	Annual Mean PM ₁₀ Concentration ^a	Number of Receptors ^{b, c}	Distance from the Source (m) ^d				
			<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

Receptor Sensitivity	Annual Mean PM ₁₀ Concentration ^a	Number of Receptors ^{b, c}	Distance from the Source (m) ^d				
			<20	<50	<100	<200	<350
Medium		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	> 32 µg.m ⁻³	>10	High	Medium	Low	Low	Low
		1 – 10	Medium	Low	Low	Low	Low
		> 10	Medium	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	< 28 µg.m ⁻³	>1	Low	Low	Low	Low	Low
Low	-	>1	Low	Low	Low	Low	Low

The sensitivity of the area has been derived for demolition, construction, earthworks and trackout.

a This refers to the background concentration derived from the assessment of baseline conditions later in this report. The concentration categories listed in this column apply to England, Wales and Northern Ireland but not to Scotland.

b The total number of receptors within the stated distance has been estimated. Only the highest level of area sensitivity from the table has been recorded.

c For high sensitivity receptors with high occupancy (such as schools or hospitals), the approximate number of occupants has been used to derive an equivalent number of receptors.

d For trackout, the distances have been measured from the side of the roads used by construction traffic. Without site-specific mitigation, trackout may occur from roads up to 500 m from large sites, 200 m from medium sites and 50 m from small sites, as measured from the site exit. The impact declines with distance from the site, and trackout impacts have only been considered up to 50 m from the edge of the road.

A.6 The IAQM dust guidance lists the following additional factors that can potentially affect the sensitivity of the area and, where necessary, professional judgement has been used to adjust the sensitivity allocated to a particular area:

- any history of dust generating activities in the area;
- the likelihood of concurrent dust generating activity on nearby sites;
- any pre-existing screening between the source and the receptors;
- any conclusions drawn from analysing local meteorological data which accurately represent the area; and if relevant the season during which the works will take place;
- any conclusions drawn from local topography;
- duration of the potential impact, as a receptor may become more sensitive over time; and
- any known specific receptor sensitivities which are considered go beyond the classifications given in the table above.

A.7 The matrices in Table A.6, Table A.7, Table A.8 and Table A.9 have been used to assign the risk for each activity to determine the level of mitigation that should be applied. For those cases where the risk category is 'negligible', no mitigation measures are required beyond those mandated by legislation.

Table A.6 Risk of Dust Impacts – 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

Table A.7 Risk of Dust Impacts – Earthworks

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

Table A.8 Risk of Dust Impacts – 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

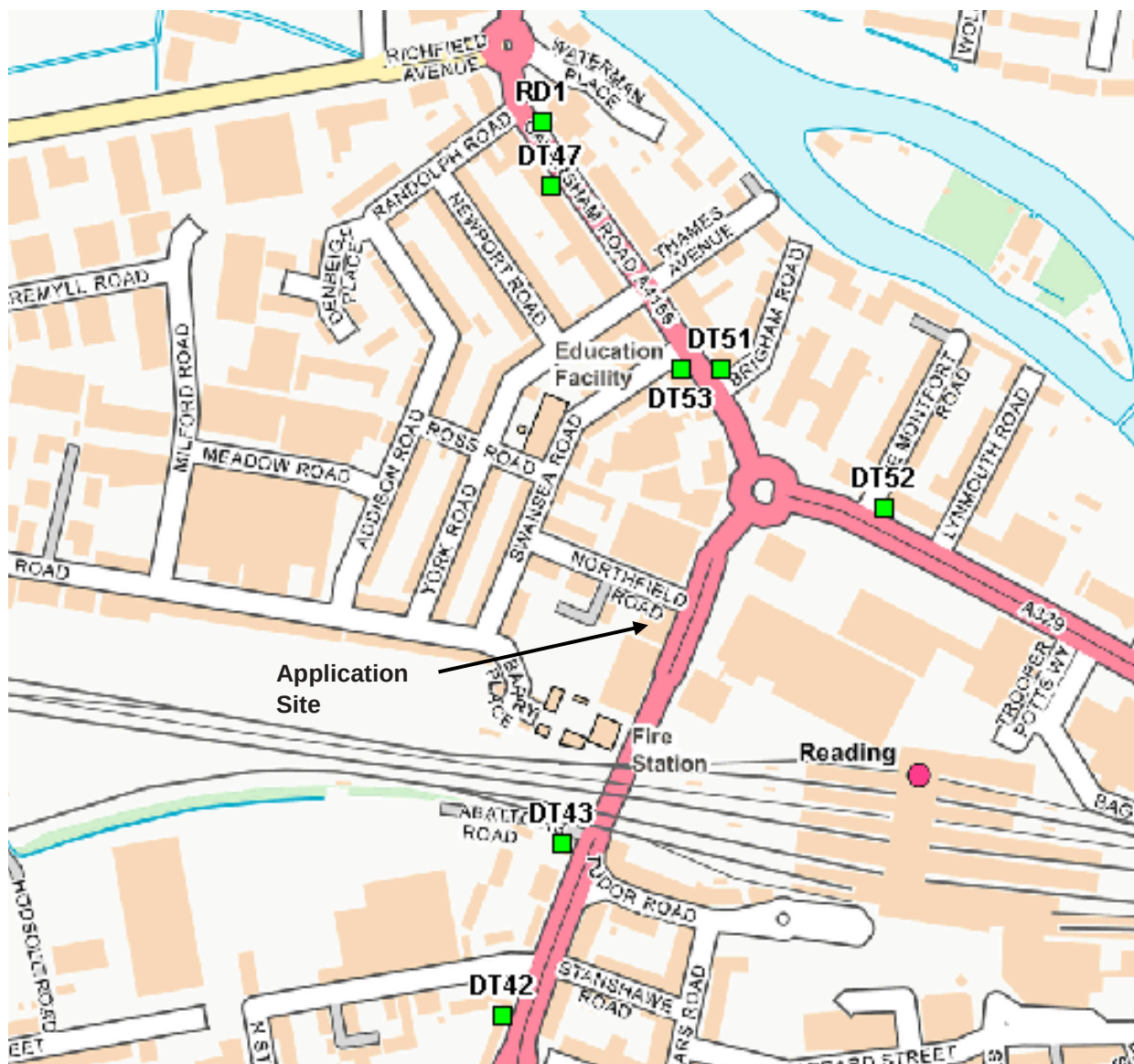
Table A.9 Risk of Dust Impacts – Trackout

Sensitivity of Area	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Low Risk	Negligible
Low	Low Risk	Low Risk	Negligible

Appendix B: Model Verification

B.1 The approach to model verification that LAQM.TG16 recommends for local authorities when they carry out their LAQM duties is summarised in Section 3. For the verification and adjustment of NO_x /NO₂ concentrations, the guidance recommends that the comparison considers a broad spread of automatic and diffusion-tube monitoring. RBC monitors roadside NO₂ concentrations passively using diffusion tubes at six locations, and automatically at one location, in the vicinity of the Application Site. The monitoring locations are shown in Figure B.1 below.

Figure B.1 Roadside Monitoring Locations for Model Verification Study



B.2 The concentrations monitored over recent years are provided in Table B.1.

Table B.1 Measured Annual-mean NO₂ Concentrations (µg.m⁻³)

Monitoring Site ID	Monitoring Method	Monitor Name	Measured Annual-mean NO ₂ Concentrations (µg.m ⁻³)			
			2015	2016	2017	2018
DT42	Passive	33 Caversham Road	48	43	45	44
DT43	Passive	59a Caversham Road	42	41	43	41
DT47	Passive	197 Caversham Road	39	35	36	34
DT51	Passive	108 Caversham Road	41	41	40	42
DT52	Passive	31a Vastern Road (lamppost)	36	37	38	33
DT53	Passive	131 Caversham Road	40	36	36	35
RD1	Automatic	Caversham Road	38	39	37	40

B.3 The model verification study has been undertaken using the most recently measured data collated in 2018, and traffic flows available from the Department for Transport for 2018.

B.4 A comparison of the modelled and monitored total NO₂ concentrations is provided in Table B.2.

Table B.1 Comparison of Monitored and Modelled NO₂ Concentrations (µg.m⁻³)

Monitoring Site	Annual-mean Total NO ₂ Concentration (µg.m ⁻³)		% Difference [(Modelled – Monitored)/Monitored]
	Monitored	Modelled	
DT42	44	35.8	-18.7
DT43	41	34.6	-15.7
DT47	34	35.5	4.3
DT51	42	37.4	-11.0
DT52	33	35.2	6.6
DT53	35	35.0	0.0
RD1	40	40.3	0.9

B.5 The above comparison indicates that the model is performing well, with the difference between modelled and monitored concentrations being well within 25% of each other. Furthermore, the model is showing no overall tendency to over or under-predict. In accordance with LAQM.TG16, model verification would not be considered necessary.

- B.6 It should be borne in mind that the monitored concentrations are themselves only estimates to the true concentrations at each point; the EU Directive on air quality designates passive NO₂ samplers indicative measures with a potential uncertainty of +/-30 %. Ignoring any uncertainty errors in the monitoring results, it is clear that the model is underpredicting at the two monitors on the same road as the Application Site, A329 Caversham Road. A model correction factor has been derived, as discussed below, to use in a sensitivity test.
- B.7 The monitored annual-mean NO_x road contributions have been derived from the monitored annual-mean NO₂ concentrations for the A329 Caversham Road monitors using the LAQM.TG16 calculator. The monitored annual-mean NO_x road contributions have then been compared with the modelled annual-mean NO_x road contributions. This comparison is provided in Table B.2 below.

Table B.2 Comparison of Monitored and Modelled Annual-mean Road NO_x Contribution (µg.m⁻³)

Monitoring Site	Annual-mean Road NO _x Contribution (µg.m ⁻³)		Ratio (Monitored/Modelled)
	Monitored	Modelled	
DT42	31.1	12.7	2.5
DT43	24.2	10.1	2.4
Average			2.4

- B.8 Based on the above analysis, a sensitivity test has been undertaken using a correction factor of 2.4 to the model outputs for all pollutants.

Appendix C: Sensitivity Test

- C.1 Whilst the model verification study indicates that the model is performing well based on a broad range of monitoring locations, the verification results indicate that the model may be under-predicting on Caversham Road. This appendix summarises the results applying a correction factor of 2.4 to the model output.

Assessment of Air Quality Impacts on Surrounding Area

Nitrogen Dioxide (NO₂)

- C.2 Table 6.1 presents the annual-mean NO₂ concentrations predicted at the façades of existing receptors.

Table 8.1 Predicted Annual-Mean NO₂ Impacts at Existing Receptors

Receptor ID	Concentration (µg.m ⁻³)		With - Without Dev as % of the AQS Objective	Impact Descriptor
	Without Development	With Development		
1	43.6	43.6	0	Negligible
2	40.2	40.2	0	Negligible
3	39.5	39.6	0	Negligible
4	42.3	42.4	0	Negligible
5	42.0	42.1	0	Negligible
6	38.5	38.5	0	Negligible
7	40.0	40.1	0	Negligible
8	42.3	42.4	0	Negligible
Maximum	43.6	43.6	0	-
Minimum	38.5	38.5	0	-

- C.3 The maximum predicted annual-mean NO₂ concentrations in the opening year at the façades of the existing receptors are above the AQS objective for NO₂ both with and without the development in place. When the magnitude of change is considered in the context of the absolute concentrations, the impact descriptor is 'negligible' at all receptors.
- C.4 As all predicted annual-mean NO₂ concentrations are below 60 µg.m⁻³, the hourly-mean objective for NO₂ is likely to be met at all receptors. The short-term NO₂ impact can be considered 'negligible' and is not considered further within this assessment.
- C.5 Overall, the impact on the surrounding area from NO₂ is considered to be 'negligible', using the criteria adopted for this assessment and based on professional judgement.

Particulate Matter (PM₁₀)

C.6 Table 6.2 presents the annual-mean PM₁₀ concentrations predicted at the façades of existing receptors.

Table 8.2 Predicted Annual-Mean PM₁₀ Impacts at Existing Receptors

Receptor ID	Concentration (µg.m ⁻³)		With - Without Dev as % of the AQS Objective	Impact Descriptor
	Without Development	With Development		
1	20.9	20.9	0	Negligible
2	19.8	19.8	0	Negligible
3	19.6	19.6	0	Negligible
4	20.4	20.5	0	Negligible
5	20.4	20.5	0	Negligible
6	19.4	19.4	0	Negligible
7	19.7	19.7	0	Negligible
8	20.3	20.3	0	Negligible
Maximum	20.9	20.9	0	-
Minimum	19.4	19.4	0	-

C.7 Predicted annual-mean PM₁₀ concentrations in the opening year at the façades of the existing receptors are well below the AQS objective for PM₁₀. When the magnitude of change is considered in the context of the absolute concentrations, the impact descriptor is categorised as 'negligible' at all receptors.

C.8 As all predicted annual mean PM₁₀ concentrations are below 31.5 µg.m⁻³, the daily-mean PM₁₀ objective is expected to be met at all receptors and the short-term PM₁₀ impact is not considered further within this assessment.

C.9 Overall, the impact on the surrounding area from PM₁₀ is considered to be 'negligible', using the criteria adopted for this assessment and based on professional judgement.

Fine Particulate Matter (PM_{2.5})

C.10 Table 6.3 presents the annual-mean PM_{2.5} concentrations predicted at the façades of existing receptors.

Table 8.3 Predicted Annual-Mean PM_{2.5} Impacts at Existing Receptors

Receptor ID	Concentration (µg.m ⁻³)		With - Without Dev as % of the AQS Objective	Impact Descriptor
	Without Development	With Development		
1	14.1	14.2	0	Negligible
2	13.5	13.5	0	Negligible
3	13.4	13.4	0	Negligible
4	13.9	13.9	0	Negligible
5	13.9	13.9	0	Negligible
6	13.3	13.3	0	Negligible
7	13.5	13.5	0	Negligible
8	13.8	13.8	0	Negligible
Maximum	14.1	14.2	0	-
Minimum	13.3	13.3	0	-

AQS objective = 25 µg.m⁻³

- C.11 Predicted annual-mean PM_{2.5} concentrations in the opening year at the façades of the existing receptors are below the AQS objective for PM_{2.5} at all receptors. When the magnitude of change is considered in the context of the absolute concentrations, the impact descriptor is categorised as 'negligible' at all receptors.
- C.12 Overall, the impact on the surrounding area from PM_{2.5} is considered to be 'negligible', using the criteria adopted for this assessment and based on professional judgement.

Assessment of New Population Exposure (Site Suitability)

- C.13 This section of the report summarises the operational-phase air quality impacts on future occupants of the development from their exposure to the prevailing levels of air pollution, which can be a factor in the suitability of the site for its proposed uses.
- C.14 Table 6.4 presents the annual-mean NO₂, PM₁₀ and PM_{2.5} concentrations predicted at the façades of proposed receptors.

Table 8.4 Predicted Annual-Mean NO₂, PM₁₀ and PM_{2.5} Concentrations (µg.m⁻³) at Proposed Receptors

Receptor	NO ₂	PM ₁₀	PM _{2.5}
Proposed Ground Floor (Commercial)	46.5	21.5	14.5
Proposed First Floor (Residential)	38.8	19.4	13.3

Receptor	NO ₂	PM ₁₀	PM _{2.5}
Proposed Second Floor (Residential)	35.2	18.5	12.8
Proposed Third Floor (Residential)	33.3	18.0	12.5
Maximum (All Floors)	46.5	21.5	14.5
Maximum (Residential Floors Only)	38.8	19.4	13.3

- C.15 The long-term and short-term objectives apply at the first floor and above of the proposed development. The short-term objectives, only, apply at the ground floor of the proposed development.
- C.16 The maximum predicted annual-mean NO₂ concentration is 46.5 µg.m⁻³ at the proposed commercial receptor (ground floor) and 38.8 µg.m⁻³ at proposed residential receptors, i.e. below the annual-mean AQS objective of 40 µg.m⁻³ at all receptors where the objective applies. As the annual-mean NO₂ concentrations are predicted to be less than 60 µg.m⁻³, the hourly-mean AQS objective is expected to be met.
- C.17 The maximum predicted annual-mean PM₁₀ concentration is 21.5 µg.m⁻³, well below the annual-mean AQS objective of 40 µg.m⁻³ at all receptors. Furthermore, as the annual-mean PM₁₀ concentration is predicted to be less than 31.5 µg.m⁻³, the daily-mean AQS objective for this pollutant is expected to be met.
- C.18 The maximum predicted annual-mean PM_{2.5} concentration is 14.5 µg.m⁻³. Predicted concentrations at all receptors are below the annual-mean AQS objective of 25 µg.m⁻³.

References

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- 2 Defra, 2010, The Air Quality Standards Regulations.
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- 4 Communities and Local Government, February 2019, National Planning Policy Framework
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- 6 Reading Borough Council (November 2017) Pre-Submission Draft Reading Borough Local Plan
- 7 EPUK & IAQM (January 2017) Land-Use Planning & Development Control: Planning For Air Quality
- 8 IAQM (2014) Guidance on the assessment of dust from demolition and construction
- 9 Defra (2016) Local Air Quality Management Technical Guidance, 2016 (LAQM.TG16)
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- 11 British Standard Institute (1983) BS 6069:Part 2:1983, ISO 4225-1980 Characterization of air quality. Glossary
- 12 <http://laqm.defra.gov.uk/review-and-assessment/tools/tools.html>
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