

**St Helens Council  
Environmental Health Division  
Planning Consultation  
Response – Pollution Section**

To: Jennifer Bolton

Date: 10<sup>th</sup> March 2020

From: Lucy Northey

Tel: 01744 676351

Planning App No: P/2020/0061/HYB

Proposals: see text

Our Ref: 035446

Location: .South of M62 Bold St Helens

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Jennifer,

The internal areas are 81,570m<sup>2</sup> with 576 car parking spaces, 156 cycle spaces and 48 motorbike spaces with 35 spaces reserved for future EV charging spaces.

**Operational phase**

The modelling assessment has been undertaken using ADMS Roads which is widely used for this type of assessment.

The assessment measures impacts against the IAQM/EMAQ+ guidance 'Planning for air quality'. The assessment has utilized data from St Helens and Warrington Borough Council's monitoring programs and background data from the DEFRA background maps.

In my judgement the assessment methodology is robust and consistent with this type of assessment and therefore the conclusions drawn from this will be reliable.

Further clarification was sought on the cumulative impacts of the development and the following reply received 'The AQ assessment included the cumulative developments considered in the traffic assessment, details of which developments were considered are in section 12.3.36 of the Traffic ES chapter'.

Modelling has been undertaken for 3 scenarios; background year of 2018 (shows two exceedances of annual mean R9 and R12 in Warrington), future baseline (do minimum – without development) in opening year 2021 and design year 2036 (both show no exceedances).

In 2021 – opening year all receptors will be below the national objective, both with and without the development. The greatest increase in annual mean is predicted to be at receptor R5 at 20 Trentham Gardens, Warrington, with a 0.3µg/m<sup>3</sup>.

The greatest increase in annual mean PM10 concentration is predicted at receptor R5 Trentham Gardens with a concentration change of 0.1µg/m<sup>3</sup> which is a negligible magnitude of change. All modelled receptors also have a negligible magnitude of change for PM2.5 in the opening and design years of the development.

For good practice, sensitivity tests were also undertaken and support the conclusion that the impact on air quality is 'not significant'

Overall the predicted local air quality effect associated with the operation of the proposed development is not significant. However, the development will still have a detrimental impact on air quality, however small and this is in opposition to the overall aims of the action plans for St Helens and Warrington.

The assessment deems that mitigation measures for the development are not required, however it does outline opportunities for enhancement and are outlined in the IAQM/EMAQ+ planning guidance as 'good practice'. Given that there is an overall detrimental impact on air quality, all be it 'negligible', and the development land is green belt, it is the opinion of in the interests of protecting the environment and air quality that the following enhancement opportunities are included within the development.

- The provision of at least one Electric Vehicle (EV) 'fast charge' point per 1,000 m2 of commercial floorspace;
- Support for and promotion of car clubs for employees;
- Improvements to cycling and walking infrastructure; and
- Inclusion of EV points for freight vehicles, where available

The application states that there are 35 spaces reserved for future EV parking spaces, which is below the level proposed above. A proportion of the EV spaces should be put in prior to commencement at a level of 1 space for every 30 parking spaces which equates to 20 spaces and the rest should have the infrastructure to enable more EV spaces as uptake increases.

### **Construction dust**

The effects of construction dust from on-site activities and 'track-out' have been assessed. Potential for dust generation magnitude was assessed as 'large' in both instances. The prevailing wind conditions are from the North and South-west, there are <10 sensitive receptors within 100m of the site boundary and 10 to 100 within 350m of the site boundary, most are classed as 'medium' sensitivity with one of 'high' sensitivity (Stepping Stones Nursery to the Eastern boundary). Taking into account the primary construction traffic route and buffer zones, the surrounding area is judged to be 'low' with respect to dust soiling and human health impact according to the IAQM construction dust guidance. The risk of impact from dust was considered to be not significant prior to mitigation measures outlined in table 6.2.

Cumulative effects are deemed to be temporary in nature, local and overall not significant. They will be managed by the measures contained within the construction management plan. These measures should be implemented throughout the construction phase.

I would suggest the following conditions or similar be placed on the development:

**Developments with staff parking of 30 spaces or more:**

Prior to first use of the [building or car park] hereby approved, electric car charging infrastructure comprising at least one electric car charging point for every 30 car parking spaces hereby approved shall be provided. As a minimum, each charging point shall comprise dedicated 32 amp radial circuit which is directly wired to an appropriate RCD at the consumer unit and terminates at a BS EN 62196 Type 2 electric vehicle charging point located where it is accessible from a dedicated off-street car parking bay.

Reason: To promote the use of sustainable transport and to protect air quality.

**Travel Plan**

Prior to the first occupation / use of the development, a Sustainable Travel Plan shall be submitted to and agreed in writing by the LPA. The Plan shall include suitable and measurable targets with the aim to reduce transport related emissions and shall consider the following provisions, measures and/or initiatives:

- (i) A programme for its implementation;
- (ii) Appointment of a travel plan co-ordinator to manage and monitor the travel plan;
- (iii) The promotion of car sharing initiatives;
- (iv) The promotion of a car club;
- (v) Provision of secure on-site cycle storage;
- (vi) An annual review of the travel plan by the travel plan co-ordinator to identify both the progress which has been made in respect of the measures set out in the plan and the action to be taken to address any concerns arising out of implementation and application of the plan.

The agreed Travel Plan shall be implemented throughout the use of the development and made available upon request.

Kind Regards,

Lucy Northey

Scientific Officer