Application no: 22/03078/FUL

Location: Land Bounded by Meadow Lane and Church Way, Iffley, Oxford

# Air Quality Assessment Document

This document provided by the applicant assesses the air quality impact created by the development in use and also the air quality / dust and mud nuisance created during the construction phase.

## **Summary**

The assessment with respect to the construction phase is found to be based on a theoretical desk top approach and doesn't address the risks and issues due to the development's location.

It therefore doesn't provide the Planning Officer with quantitative information to enable a judgement to be made on the harm with respect to air quality and dust/mud on the surrounding roads caused by the construction process.

#### Context

The construction period will be around 15 months. The site is solely to be accessed from Meadow Lane. There is a unique situation on Meadow Lane. Lucas and Remy House is sheltered accommodation and its building extends from the Meadow Lane/Church Way junction to the corner of the Horse Fields development. And the ground floor residents only access to outside space is their garden fronting Meadow Lane hence these areas are used by the residents as recreation/seating areas. The same applies to the flats on the Church Way frontage where these seating areas are even closer to the road. Thus in both these circumstances users of the gardens are directly effected by pollution levels created by vehicular traffic.

There is also the situation that Cordrey Green rear gardens abut Church Way / Meadow Lane junction and are hence are subject to the emissions from Church Way. There being hot spot with heavy vehicles manoeuvring from Church Way into Meadow Lane.

## Impact during construction

Vehicle movements

The applicant cites in the air quality report that 'that there will be a maximum of between 10-50 outward heavy vehicle movements per day.'

This means that there will be 20-100 heavy vehicle movements into and exiting the site per day. Thus as the consequence of this there will be slow moving heavy construction vehicles going down Meadow Lane and there will be queuing heavy vehicles on Meadow Lane waiting to gain access to the site. Hence there will air pollution opposite the Lucy and Remy gardens significantly greater than that given in the report. This specific circumstances have not been analysed in the air quality assessment.

However there is no quantification of the additional vehicular movements associated with the construction phase, 3.5 T vans/pick up (white vans) and the significant

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smaller vans and cars used by operatives. A peak of 60 operatives is envisaged and consequentially there will be another 50 in and out vehicle movements.

The emissions from these need factoring in.

Thus the statement 'it is deemed highly unlikely that, across a year, traffic volumes during the construction works will be higher than the relevant screening criteria of 25 AADT (Annual Average Daily Traffic) for heavy vehicles and 100 AADT for light vehicles recommended by EPUK/IAQM guidance (Moorcroft and Barrowcliffe et al, 2017) is not substantiated.

If properly analysed this would move the designation into a high risk category necessitating specific measures to mitigate this risk to an acceptable level.

The situation will be even more acute during the early stages of construction when these vehicles will have to be parked on Meadow Lane as they won't be able to pull onto the site until some road infrastructure is created on the Horse Fields. It is also at this time when larger articulated and more polluting vehicles will be coming to site to delivery heavy construction plant, 30T excavators etc.

# Dust and mud impact

The assessment concludes that 'that there is a risk of material being tracked 200 m from the site exit.' The sphere of influence is shown on the diagram below, page 22 of the report.



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#### **Recommendations in the Air Quality report**

The report in Table A4.1: gives Best-Practice Mitigation Measures Recommended for the Works. Of which the majority are in the highly recommended category.\

These are only a recommendations, they are generic solutions not site specific and the applicant has made no statement as to what measures they would take or commitment to them to reduce risks to acceptable levels. Hence these recommendations are only 'trust us' statements.

#### Conclusion

A robust site specific analysis and risk assessment of the air quality issue relating to the construction process has not been presented for what is a site with extremely challenging logistical issues the solutions to which greatly affect air quality.

It is asserted that the planning officer has insufficient information and detailed air quality risk management plan form a judgement on the impact of air quality from the significant length of construction activities.

This paper solely relates to air quality issues associated with construction and separately the Construction Traffic Management Plan CTMP proposals are discussed.

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