

Andrew Collinson

From: [REDACTED]
Sent: 27 June 2022 16:35
To: Andrew Collinson
Subject: PAP/2021/0663 - Land On The North East of J10 M42 Dordon/A5

Andrew,

Outline planning permission for development of land within Use Class B2 (general industry), Use Class B8 (storage and distribution) and Use Class E(g)(iii) (light industrial), and ancillary infrastructure and associated works, development of overnight lorry parking facility and ancillary infrastructure and associated works. Details of access submitted for approval in full, all other matters reserved

Further to review of the above I have the following comments

Contaminated Land

Further to review of **Phase II Ground Investigation Report September 2021 Report No. 70530-2 Rev 2 Ground and Project Consultants Ltd** I agree with the conclusions and recommendations in the report:

- The geo-environmental assessment of the site found that all samples of Topsoil and Halesowen Formation recorded contaminant concentrations well below their relevant screening criteria.
- The site is characterised as characteristic situation 1, where no ground gas protection measures are considered necessary for the site.

No further assessment or remediation is required.

Air Quality – Construction Phase

Transport Assessment May 2021 (Revision C, Nov 2021) Bancroft Consulting

The proposals are classified as major within the NWBC Air Quality SPD. Required mitigation will therefore include a low emission strategy and damage costs calculations. I agree with the proposal for Electric Vehicle (EV) charging for 10% of all car and motorcycle spaces across the site with ducting installed so that a further 15% of spaces are capable of being converted to EV charging spaces if required in the future as described in the Transport Assessment. These proposals should be included in the low emission strategy.

Environmental Statement Volume 2: Main Statement

I accept that information on the number of vehicles and NRMM associated with the construction phase was not available at the time of writing and I therefore recommend that the dust risk assessment is reviewed and amended if required prior to commencement of construction (there is no demolition phase). The number of receptors within various distances of the site boundary in Table 8.7 appears inaccurate when the site boundary is measured to nearest sensitive receptors.

I agree 'Experience of assessing the exhaust emissions from on-site plant (also known as non-road mobile machinery or NRMM) and site traffic suggests that they are unlikely to make a significant impact on local air quality, and in the vast majority of cases they will not need to be quantitatively assessed.'

I agree that measures described in 8.7 Mitigation Measures Construction Phase Fugitive Dust and Particulate Matter (PM10) Emission are suitable. A Construction Environmental Management Plan (CEMP) must be provided and

agreed by the Local Planning Authority in writing prior to the commencement of development. Vehicles using unpaved haul roads are often likely to be a dominant source of dust emissions

The report states 'The residual effects of dust and PM10 generated by construction activities will be direct, temporary and short-term and of negligible significance following the implementation of mitigation measures, which is considered to be not significant.' It is common for lapses in control of dust to take place on construction sites. Adherence to an agreed CEMP including a proactive approach to keep dust emissions as low as reasonably practicable must be maintained throughout the development.

Air Quality – Operational Phase

A proportion of operational traffic for the operation phase of the proposals is predicted to travel east along the A5 (20%). An exceedance of the national air quality was identified along this route in data for 2019 but was found to be below the objective the following year. The opening year for the proposed development is 2026 by which date there should have been a reduction in roadside emissions of nitrogen dioxide as older vehicles go out of circulation. It seems unlikely that the predicted volume of increased traffic from the proposals during the opening year onwards would have a significant adverse effect on air quality objectives along the route.

The additional trip rate derived for the damage costs assessment was 1,568 AADT (average annual daily traffic resulting in a total damage cost associated with road transport estimated to be approximately £97,229. These costs should be allocated to measures to improve air quality.

Mitigation should consist of low emission strategy including an annual review of commercial vehicles in the fleet with regard to air quality:

- Use reasonable endeavours to use/require vehicle use complying with the latest European Emission Standard.
- Provide a fleet emission reduction strategy/Low Emission Strategy, including low emission fuels and technologies, including ultra-low emission service vehicles.
- A Travel Plan aiming to encourage occupants to adopt travel behaviour in favour of sustainable travel modes such as public transport, which would be of benefit to local air quality.
- The provision of electric vehicle charging stations, with optional extra charging points available at a frequency of 10% of parking spaces for commercial/industrial.

The proposals include a lorry park, the use of which may attract a mixture of vehicles from different companies of varying ages and condition and therefore potentially higher air pollution emissions. The low emission strategy should seek to address this if possible. The low emission strategy should be agreed in writing with the Local Planning Authority prior to commencement of development

Regards,

Matt

