



# Cereal Partners, Staverton

## Air Quality Assessment

### Cereal Partners UK

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SLR Project No.: 425.067225.00001

30 October 2025

Revision: 2.0

## Revision Record

| Revision | Date            | Prepared By | Checked By | Authorised By |
|----------|-----------------|-------------|------------|---------------|
| 1.0      | 23 October 2025 | DW          | MM         | MM            |
| 2.0      | 30 October 2025 | DW          | MM         | MM            |

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## 1.0 Introduction

SLR Consulting Ltd (SLR) has been commissioned Cereal Partners UK, to undertake an Air Quality Assessment in support of the planning application for a proposed factory building with a floor space of 2,400m<sup>2</sup> (the 'Proposed Development') located at the existing Cereal Partners UK site off the B3015 New Terrace, Staverton, BA14 6PG (the 'Site').

The Site currently comprises the existing Cereal Partners UK site, including factory buildings and associated car parking which support current operations. Located at the approximate National Grid Reference (NGR): x385897, y161005. The Site falls within the administrative area of Wiltshire Council (WC). The surrounding area comprises:

- River Avon to the north, with agricultural fields beyond;
- Areas associated with the Cereal Partners site to the immediate east, with a rail line, the River Avon, agricultural fields and a solar farm beyond;
- Buildings associated with the Cereal Partners site to the immediate south, with agricultural fields and a rail line beyond; and
- Buildings associated with the Cereal Partners site to the immediate west, with the B3105 New Terrace and a mixture of residential and commercial properties beyond.

Vehicular access to the Site will be via the existing access onto the B3105.

## 1.1 Scope of Assessment

Pre-assessment consultation was undertaken with the Environmental Health Officer (EHO) at WC<sup>1</sup> to agree the scope and methodology of the air quality assessment. The following scope, based on national and local guidance as well as established best practice, has been undertaken, as agreed with WC:

- Baseline Evaluation – Assessment of existing air quality in the local area;
- Construction Phase Assessment – Identification and assessment of potential air quality impacts associated with the construction phase of the Proposed Development;
- Operational Phase Assessment – Identification and assessment of potential air quality impacts associated with the operational phase of the Proposed Development at existing receptors; and
- Mitigation Measures – Identification of mitigation measures, as appropriate.

The existing factory is permitted under the Environmental Permitting (England and Wales) Regulations (EPR) 2016 (as amended) regime under an existing permit (EPR/UP3027SF). The Proposed Development is not expected to result in additional operational emissions sources associated with existing industrial processes (e.g. related to medium combustion plan, on-site dust management, etc.). As such, operational emissions are limited to the consideration of additional vehicle trips associated with the Proposed Development and consideration of process emissions has been excluded from the current assessment scope. Should further information become available indicating a change to existing process emissions, a targeted assessment should be undertaken and submitted to WC to ensure any potential impacts are appropriately considered.

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<sup>1</sup> Email between SLR and the EHO at WC, dated 17<sup>th</sup> September 2025.



## 2.0 Background Context

### 2.1 Legislation

A dual set of regulations, applicable to National and Local Government separately are currently operable within the UK.

#### 2.1.1 National Obligations

##### 2.1.1.1 Air Quality Standards

The Air Quality Standards Regulations 2010<sup>2</sup> (AQSR) transpose both the EU Ambient Air Quality Directive (2008/50/EC), and the Fourth Daughter Directive (2004/107/EC) within UK legislation, in order to align and mirror European obligations. The AQSR includes Limit Values which are legally binding ambient concentration thresholds which, however, are only applicable at specific locations (Schedule 1: AQSR)<sup>3</sup>. Carriageways or central reservations of roads, and any location where the public do not have access (e.g. industrial sites), are exempt. On this basis, if a sampling point does not comply with the siting locations, then strict comparison to the AQSR Limit Values cannot be made.

Following the UK's withdrawal from the EU, the Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020<sup>4</sup> was introduced to mirror revisions to supporting EU legislation. As a result, the fine particulate matter (as PM<sub>2.5</sub>) Limit Value is 20µg/m<sup>3</sup> (to be met by 2020).

The responsibility of achieving the AQSR (and European equivalent Directives) is a national obligation for Central Government who undertake assessments on an annual basis. Local Authorities have no statutory obligation to achieve the AQSR or the European equivalent Directives, unless otherwise instructed to assist Central Government under Ministerial Direction.

##### 2.1.1.2 Environment Targets (Fine Particulate Matter) Regulations

The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023<sup>5</sup> introduced an annual mean concentration target of 10µg/m<sup>3</sup> to be met across England by 2040. Central Government and Devolved Administrations are responsible for meeting this target, however not until 2040. Local Authorities have no responsibility to achieve this target.

#### 2.1.2 Local Obligations

Part IV of the Environment Act 1995<sup>6</sup> (as amended) requires the Secretary of State to review the national Air Quality Strategy (AQS) every five years and modify this as necessary. It also established the system of Local Air Quality Management (LAQM) for Local Authorities to regularly review and assess air quality within their administrative area.

The Air Quality (England) Regulations 2000 (as amended) ('the Regulations') provide the statutory basis for the Air Quality Objectives Local Authorities must adhere to under LAQM in

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<sup>2</sup> The Stationary Office Limited (TSOL), The Air Quality Standards Regulations (England) 2010, Statutory Instrument No. 1001.

<sup>3</sup> Schedule 1 of the 2010 AQSR provides the locations of the sampling points where the AQSR Limits Values can be assessed.

<sup>4</sup> TSOL, The Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020, Statutory Instrument No. 1313.

<sup>5</sup> TSOL, The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023. Statutory Instruments 2023 No. 96.

<sup>6</sup> His Majesty's Stationary Office (HMSO), The Environment Act 1995, (1995).



England. PM<sub>2.5</sub> is not currently cited within the Regulations, however in line with the AQS and the '*PM<sub>2.5</sub> Targets: Interim Planning Guidance*<sup>7</sup>' issued by the Department for Environment, Food and Rural Affairs (Defra) in October 2024, Local Authorities are required to work towards reducing PM<sub>2.5</sub>.

The Air Quality Objectives apply at locations where members of the public are regularly present and might reasonably be expected to be exposed to pollutant concentrations over the relevant averaging period (referred to as 'relevant exposure'). Table 2-2 provides an indication of those locations. Where any of the prescribed Air Quality Objectives are not likely to be achieved, the authority must designate an Air Quality Management Area (AQMA). For each AQMA, the local authority is required to prepare an Air Quality Action Plan (AQAP), which details measures the authority intends to introduce to deliver improvements in local air quality and achieve compliance.

The latest AQS for England was published in 2023<sup>8</sup>. The AQS provides the delivery framework for air quality management across England for local authorities and summarises the air quality standards and objectives operable within England for the protection of public health and the environment.

The ambient air quality standards of relevance this assessment (collectively termed Air Quality Assessment Levels (AQALs) throughout this report) are provided in Table 2-1. These are primarily based upon the Air Quality Objectives Local Authorities are responsible for achieving – reflective of the Local Planning Authority's duties. The PM<sub>2.5</sub> AQSR AQAL has, however, also been included for completeness.

**Table 2-1: Relevant Ambient AQALs**

| Pollutant                           | AQAL (µg/m <sup>3</sup> ) | Averaging Period                                                      |
|-------------------------------------|---------------------------|-----------------------------------------------------------------------|
| Nitrogen dioxide (NO <sub>2</sub> ) | 40                        | Annual mean                                                           |
|                                     | 200                       | 1-hour mean (not to be exceeded on more than 18 occasions per annum)  |
| Particles (PM <sub>10</sub> )       | 40                        | Annual mean                                                           |
|                                     | 50                        | 24-hour mean (not to be exceeded on more than 35 occasions per annum) |
| Particles (PM <sub>2.5</sub> )      | 20                        | Annual mean                                                           |

**Table 2-2: Human Health Relevant Exposure**

| AQAL Averaging Period | AQALs should apply at                                               | AQALs should not apply at                                               |
|-----------------------|---------------------------------------------------------------------|-------------------------------------------------------------------------|
| Annual mean           | Building facades of residential properties, schools, hospitals etc. | Facades of offices<br>Hotels<br>Gardens of residences<br>Kerbside sites |
| 24-hour mean          | As above together with hotels and gardens of residential properties | Kerbside sites where public exposure is expected to be short term       |

<sup>7</sup> Defra, PM<sub>2.5</sub> Targets: Interim Planning Guidance, (2024).

<sup>8</sup> Defra, Air Quality Strategy: Framework for Local Authority Delivery, (2023).



| AQAL Averaging Period | AQALs should apply at                                                                 | AQALs should not apply at                                                |
|-----------------------|---------------------------------------------------------------------------------------|--------------------------------------------------------------------------|
| 1-hour mean           | As above together with kerbside sites of regular access, car parks, bus stations etc. | Kerbside sites where public would not be expected to have regular access |

### 2.1.3 Environmental Protection Act 1990

The Environmental Protection Act 1990<sup>9</sup> sets out provisions for the regulation of statutory nuisances. Section 79 sets out this statutory nuisance as, *'any dust, steam, smell or other effluvia arising on industrial, trade or business premises and being prejudicial to health or a nuisance'*.

Section 79 requires that, where a complaint of a statutory nuisance is made to it by a person living within its area, a Local Authority must take steps as are reasonably practicable to investigate the complaint.

Fractions of dust greater than 10µm (i.e. greater than PM<sub>10</sub>) in diameter typically relate to nuisance effects as opposed to potential health effects and therefore are not covered within the UK AQS. In legislation there are currently no numerical limits in terms of what level of dust deposition constitutes a nuisance.

### 2.1.4 Ecological Habitats

Ecological habitats vary in terms of their sensitivity, perceived ecological value, geographic importance, and level of protection. Within the UK, there are three types of nature conservation designations: international, national and local designations, which are all provided environmental protection from developments, including from atmospheric emissions, with a greater level of protection afforded to the former, relative to the latter.

The Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way (CROW) Act 2000)<sup>10</sup> provides protection to Sites of Special Scientific Interest (SSSI) to ensure that developments are not likely to cause damage. The Act also provides a protection to local nature conservation sites, which can be particularly important in providing 'buffers' to SSSIs and European sites.

The Environment Act 1995 and the Natural Environment and Rural Communities Act (NERC) 2006<sup>11</sup> provides an extension to the biodiversity duty set out in the CROW Act to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity (i.e. ecological designations of local status).

Sites of ecological importance are provided environmental protection with respect to air quality, through the application of standards known as Critical Levels (CL<sub>e</sub>) and Critical Loads (CL<sub>o</sub>). The level of protection afforded to an internationally designated site is greater than that afforded to a locally designated site (e.g. Local Nature Reserves (LNR)); reflecting the relative sensitivity of the sites as well as their perceived ecological value.

<sup>9</sup> HMSO, The Environmental Protection Act 1990, (1990).

<sup>10</sup> HMSO, Wildlife and Countryside Act, (1981).

<sup>11</sup> HMSO, Natural Environment and Rural Communities Act, (2006).



## 2.2 Policy

### 2.2.1 National Policy

#### 2.2.1.1 National Planning Policy Framework

The December 2024 update to the National Planning Policy Framework<sup>12</sup> (NPPF) sets out planning policy for England. The NPPF states that the planning system should contribute to and enhance the natural and local environment, by preventing new development from contributing to or being adversely affected by unacceptable concentrations of air pollution and development should, wherever possible, help to improve local environmental conditions such as air quality.

In specific relation to air quality policy, the document states:

***“Chapter 15 – Conserving and Enhancing the Natural Environment***

***Ground Conditions and Pollution***

*Para 199. 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.”*

The NPPF is accompanied by web based supporting Planning Practice Guidance (PPG)<sup>13</sup> which includes guiding principles on how planning can take account of the impacts of new development on air quality. In regard to air quality, the PPG states:

*“The Department for Environment, Food and Rural Affairs carries out an annual national assessment of air quality using modelling and monitoring to determine compliance with relevant Limit Values. It is important that the potential impact of new development on air quality is taken into account where the national assessment indicates that relevant limits have been exceeded or are near the limit, or where the need for emissions reductions has been identified.”*

*“Whether 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 have an adverse effect on air quality in areas where it is already known to be poor, particularly if it could affect the implementation of air quality strategies and action plans and/or breach legal obligations (including those relating to the conservation of habitats and species). Air quality may also be a material consideration if the proposed development would be particularly sensitive to poor air quality in its vicinity.”*

The PPG sets out the information that may be required within the context of a supporting air quality assessment, stating that *“Assessments need to be proportionate to the nature and scale of development proposed and the potential impacts (taking into account existing air*

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<sup>12</sup> Ministry of Housing, Communities & Local Government, National Planning Policy Framework, (2024).

<sup>13</sup> Ministry of Housing, Communities and Local Government, Planning Practice Guidance: Air Quality, (2019).



*quality conditions), and because of this are likely to be locationally specific [...] Mitigation options will need to be locationally specific, will depend on the proposed development and need to be proportionate to the likely impact”.*

## **2.2.2 Local Policy**

### **2.2.2.1 Wiltshire Core Strategy**

WC adopted the Wiltshire Core Strategy<sup>14</sup> in January 2015 which provides a strategic planning policy framework for the delivery of sustainable growth in Wiltshire up to 2026. Within the Core Strategy, the following policies relate to air quality:

#### **“Core Policy 55: Air Quality**

*Development proposals, which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity. Mitigation measures should demonstrate how they will make a positive contribution to the aims of the Air Quality Strategy for Wiltshire and where relevant, the Wiltshire Air Quality Action Plan. Mitigation may include:*

- i. landscaping, bunding or separation to increase distance from highways and junctions*
- ii. possible traffic management or highway improvements to be agreed with the local authority*
- iii. abatement technology and incorporating site layout/separation and other conditions in site planning*
- iv. traffic routing, site management, site layout and phasing*
- v. where appropriate, contributions will be sought toward the mitigation of the impact a development may have on levels of air pollutants.”*

#### **“Core Policy 57: Ensuring High Quality Design and Place Shaping**

*A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through: [...]*

- vii. having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter) [...]*

#### **“Core Policy 69: Protection of the River Avon SAC**

*In order to avoid and reduce potential environmental effects on the River Avon SAC, development will need to incorporate measures during construction and operation to avoid and prevent pollution and mitigate potential disturbance effects; appropriate measures may include consideration of suitable buffer zones along*

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<sup>14</sup> WC, Wiltshire Core Strategy, (2015).



*watercourses, habitat enhancements and river access management measures. All development within 20m of the river banks should submit a construction management plan to the local planning authority to ensure measures proposed during construction are satisfactory [...]"*

WC is in the process of preparing a new Local Plan<sup>15</sup> which will put in place a new planning strategy for the period to 2038. Once adopted, it will replace the current Local Plan. While no material weight is applied to the content of the new Local Plan, the following policy within relates to air quality:

***"Policy 101 – Air Quality***

*Development proposals, which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels where air quality is a concern in order to protect public health, environmental quality and amenity.*

*Mitigation measures should demonstrate how they will make a positive contribution to the aims of the Air Quality Strategy for Wiltshire and where relevant, the Wiltshire Air Quality Action Plan. The pollutants of particular concern that developers must have regard to are nitrogen dioxide, fine particulates (PM<sub>10</sub>) and very fine particulates (PM<sub>2.5</sub>)."*

## 2.3 Assessment Guidance

This assessment has been carried out in accordance with the principles contained within the guidance documents below:

- Defra: Local Air Quality Management Technical Guidance (LAQM.TG(22))<sup>16</sup>;
- Defra: PM<sub>2.5</sub> Targets, Interim Planning Guidance (the 'PM<sub>2.5</sub> IPG');
- Environmental Policy Implementation Community (EPIC) (previously Environmental Protection UK (EPUK)) and the Institute of Air Quality Management (IAQM): Land-Use Planning and Development Control: Planning for Air Quality<sup>17</sup> (the 'EPIC & IAQM' guidance);
- IAQM: Guidance on the Assessment of Dust from Demolition and Construction<sup>18</sup> (the 'IAQM Construction Dust' guidance);
- IAQM: A Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites<sup>19</sup> (the 'IAQM Nature guidance'); and
- WC: Wiltshire Council Air Quality Supplementary Planning Document<sup>20</sup> (the 'WC Air Quality SPD').

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<sup>15</sup> WC, Wiltshire Local Plan, Pre-Submission Draft 2020-2038 (Regulation 19), (2025).

<sup>16</sup> Defra in partnership with the Scottish Government, Welsh Government and Department of Agriculture, Environment and Rural Affairs, Local Air Quality Management Technical Guidance 22, (2025).

<sup>17</sup> EPIC (previously EPUK) & IAQM, Land-Use Planning and Development Control: Planning for Air Quality v1.2, (2017).

<sup>18</sup> IAQM, Guidance on the Assessment of Dust from Demolition and Construction v2.2, (2024).

<sup>19</sup> IAQM, A Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites v1.1, (2020).

<sup>20</sup> WC, Wiltshire Council Air Quality Supplementary Planning Document, (2023).



## 3.0 Assessment Methodology

### 3.1 Development Classification

The Proposed Development has been classified (i.e. Type 1, Type 2 or Type 3) in accordance with the WC Air Quality SPD.

The Proposed Development comprises approximately 2,400m<sup>2</sup> of general industry floor space and therefore meets the 'Type 1' and Type 2' classification.

Mitigation requirements associated with the above classification have been discussed in Section 7.2.

### 3.2 Construction Phase

A construction dust assessment has been undertaken in accordance with IAQM Construction Dust guidance. The assessment of risk is determined by considering the risk of dust effects arising from four activities in the absence of mitigation:

- Demolition;
- Earthworks;
- Construction; and
- Trackout.

The assessment methodology considers three separate dust impacts with account being taken of the sensitivity of the area that may experience these effects:

- Annoyance due to dust soiling;
- The risk of health effects due to an increase in exposure to PM<sub>10</sub>; and
- Harm to ecological receptors.

The first stage of the assessment involves a screening to determine if there are sensitive receptors within threshold distances of the Site activities associated with the construction phase of the scheme. A detailed assessment is required where a:

- Human receptor is located within 250m of the Site, and/or within 50m of routes used by construction vehicles, up to 250m from the Site entrance(s); and/or
- Ecological receptor is located within 50m of the Site, and/or within 50m of routes used by construction vehicles, up to 250m from the Site entrance(s).

The dust emission class (or magnitude) for each activity is determined on the basis of the guidance, indicative thresholds and professional judgement by a technically competent assessor. The risk of dust effects arising is based upon the relationship between the dust emission magnitude and the sensitivity of the area. The risk of impact is then used to determine the appropriate mitigation requirements, whereby through effective application, residual effects are considered not significant.

Given the short-term nature of the construction phase and the low volume of vehicle movements that will likely arise when compared to the operational phase, it is unlikely that significant air quality effects from construction traffic will arise. These effects have therefore been scoped out of the assessment, which is a standard approach for a scheme of this nature and scale.



### **3.3 Operational Phase**

#### **3.3.1 Road Traffic Screening Assessment**

#### **3.3.2 Human Receptors**

A screening assessment of operational phase road traffic has been undertaken using indicative screening criteria prescribed by EPIC & IAQM guidance. The relevant screening criteria for this assessment are as follows:

- Outside of an AQMA:
  - o A change of Light-Duty Vehicle (LDV) flows of >500 as 24-hour Annual Average Daily Traffic (AADT); and/or
  - o A change of Heavy-Duty Vehicle (HDV) flows of >100 as 24-hour AADT.
- Within or adjacent to an AQMA:
  - o A change of LDV flows of >100 as 24-hour AADT; and/or
  - o A change of HDV flows of >25 as 24-hour AADT.

If the Proposed Development is found not to exceed any of the relevant indicative criteria presented, then further assessment is not required. Impacts can therefore be described as having an insignificant effect on local air quality with regard to human receptors.

#### **3.3.3 Ecological Receptors**

The assessment procedure outlined within the IAQM Nature guidance document has been used in relation to the assessment of sensitive ecological receptors. This initially comprises a screening assessment irrespective of current baseline rates to indicate whether:

- Any sensitive qualifying features are located within 200m of a road link projected to experience developmental-generated vehicle movements; and
- The Proposed Development (project-alone for national and local sites) is likely to generate either >1,000 AADT (total traffic) and/or >200 HDV AADT on a road link.

The outcomes of the above will determine whether impacts associated with the Proposed Development could result in 'no likely significant effect' on the assessed ecological feature, providing the location of the screened ecological receptor can be validated.

If the above conditions are not met, then impacts on ecological designations are likely to be imperceptible, whereby resultant effects can be classed as insignificant.



## 4.0 Baseline Environment

WC, in fulfilment of statutory requirements, has conducted an ongoing exercise to review and assess air quality within its administrative area. The latest publicly available Annual Status Report (ASR) for WC at the time of writing is the 2025 ASR<sup>21</sup>, i.e. 2020-2024 monitoring data.

Pollutant concentrations monitored during 2020 and 2021 (i.e. affected by the COVID-19 pandemic) are expected to be atypical and not representative of the local environment. However, this data has been presented for completeness.

### 4.1 Air Quality Management Areas

At present, WC has eight declared AQMAs within its administrative area, all of which declared for exceedances of the annual mean NO<sub>2</sub> AQAL. The closest AQMA to the Site is the 'Bradford-on-Avon AQMA' which is located c. 3km to the west, as shown in Figure 4-1.

This AQMA was declared in 2004 due to exceedances of the annual mean NO<sub>2</sub> and PM<sub>10</sub> 24-hour mean AQALs at locations of relevant exposure. However, the declaration in relation to exceedances of the 24-hour mean PM<sub>10</sub> AQAL was removed in 2021.

### 4.2 Review of Air Quality Monitoring

A review of central and local monitoring datasets has been conducted. All monitoring data presented has been ratified by the publisher.

#### 4.2.1 Automatic Air Quality Monitoring

WC undertake automatic monitoring of NO<sub>2</sub> and PM<sub>10</sub> at three locations within its administrative area. The nearest automatic monitor to the Site is AM2 (Bradford-on-Avon), located approximately 3.1km to the west within the Bradford-on-Avon AQMA.

No monitors associated with the Automatic Urban and Rural Network (AURN) are located within 10km of the Site. The AURN monitoring network has therefore not been considered further within this assessment.

The details and results of AM2 are presented in Table 4-1 and Table 4-2 respectively, whilst the location is shown in Figure 4-1.

**Table 4-1: AM2 (Bradford-on-Avon) Automatic Monitor: Details**

| Site Type | NGR (m) |        | Height (m) | Distance to Site (km) |
|-----------|---------|--------|------------|-----------------------|
|           | X       | Y      |            |                       |
| Roadside  | 382533  | 161115 | 2.0        | 3.3                   |

**Table 4-2: AM2 (Bradford-on-Avon) Automatic Monitor: Annual Mean NO<sub>2</sub> Results**

| Pollutant       | Exposure Period                    | 2024 Data Capture % | Annual Mean Concentration (µg/m <sup>3</sup> ) / Number of Exceedances |      |      |      |                      |
|-----------------|------------------------------------|---------------------|------------------------------------------------------------------------|------|------|------|----------------------|
|                 |                                    |                     | 2020                                                                   | 2021 | 2022 | 2023 | 2024                 |
| NO <sub>2</sub> | Annual Mean                        | 83.6                | 25                                                                     | 26   | 28   | 30   | 31                   |
|                 | 1-Hour Means >200µg/m <sup>3</sup> |                     | 0                                                                      | 0    | 0    | 0    | 0(92) <sup>(A)</sup> |

<sup>21</sup> WC, 2024 Air Quality Annual Status Report, (2024).



| Pollutant                                                                                                                                                                                                                                                                    | Exposure Period                           | 2024 Data Capture % | Annual Mean Concentration ( $\mu\text{g}/\text{m}^3$ ) / Number of Exceedances |      |      |      |                      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|---------------------|--------------------------------------------------------------------------------|------|------|------|----------------------|
|                                                                                                                                                                                                                                                                              |                                           |                     | 2020                                                                           | 2021 | 2022 | 2023 | 2024                 |
| PM <sub>10</sub>                                                                                                                                                                                                                                                             | Annual Mean                               | 82.2                | 18                                                                             | 17   | 17   | 23   | 24                   |
|                                                                                                                                                                                                                                                                              | 24-Hour Means $>50\mu\text{g}/\text{m}^3$ |                     | 0                                                                              | 0    | 2    | 3    | 1(39) <sup>(B)</sup> |
| PM <sub>2.5</sub>                                                                                                                                                                                                                                                            | Annual Mean                               | 82.2                | 13                                                                             | 12   | 16   | 18   | 18                   |
| Note:<br>(A) Where the period of valid data is less than 85%, the 99.8 <sup>th</sup> percentile of 1-hour means is provided in brackets.<br>(B) Where the period of valid data is less than 85%, the 90.4 <sup>th</sup> percentile of 24-hour means is provided in brackets. |                                           |                     |                                                                                |      |      |      |                      |

As shown in Table 4-2, there were no exceedances of the relevant AQALs (see Table 2-1) at the AM2 automatic monitor from 2020-2024.

#### 4.2.2 Passive Diffusion Tube Monitoring

Passive NO<sub>2</sub> diffusion tube monitoring is currently undertaken by WC at numerous locations within its administrative area.

The details and results of the monitoring are presented in Table 4-3 and Table 4-4 respectively, whilst their locations are shown in Figure 4-1.

**Table 4-3: Local NO<sub>2</sub> Diffusion Tube Monitoring Sites: Details**

| Site ID    | Site Type        | NGR (m) |        | Height (m) | Approximate Distance Site (km) |
|------------|------------------|---------|--------|------------|--------------------------------|
|            |                  | X       | Y      |            |                                |
| 25         | Roadside         | 382716  | 161228 | 2.5        | 3.1                            |
| 26, 27, 28 | Roadside         | 382538  | 161122 | 1.8        | 3.3                            |
| 29         | Kerbside         | 382544  | 161085 | 2.4        | 3.3                            |
| 30         | Urban Background | 381878  | 160836 | 2.4        | 4.0                            |
| 31         | Urban Centre     | 383188  | 161006 | 2.2        | 2.7                            |
| 32         | Roadside         | 382711  | 161007 | 2.4        | 3.1                            |
| 33         | Roadside         | 382844  | 160985 | 2.5        | 3.0                            |
| 34         | Roadside         | 382595  | 161445 | 2.5        | 3.3                            |
| 35         | Roadside         | 382552  | 160781 | 2.5        | 3.3                            |
| 36         | Roadside         | 382575  | 160501 | 2.8        | 3.3                            |
| 39         | Roadside         | 385575  | 160710 | 2.0        | 0.4                            |
| 40         | Roadside         | 385973  | 160321 | 1.8        | 0.7                            |
| 41         | Urban Background | 384343  | 157806 | 2.5        | 3.5                            |
| 42         | Kerbside         | 385244  | 157541 | 2.5        | 3.5                            |
| 43         | Roadside         | 386130  | 157762 | 2.3        | 3.2                            |

**Table 4-4: Local NO<sub>2</sub> Diffusion Tube Monitoring Sites: Results**

| Site ID | 2024 Data Capture % | Annual Mean NO <sub>2</sub> Concentration ( $\mu\text{g}/\text{m}^3$ ) |      |      |      |      |
|---------|---------------------|------------------------------------------------------------------------|------|------|------|------|
|         |                     | 2020                                                                   | 2021 | 2022 | 2023 | 2024 |
| 25      | 90.6                | 51                                                                     | 57   | 43   | 40   | 39   |



|           |      |    |    |    |    |    |
|-----------|------|----|----|----|----|----|
| 26, 27,28 | 100  | 23 | 24 | 23 | 22 | 22 |
| 29        | 100  | 37 | 39 | 39 | 33 | 33 |
| 30        | 100  | 6  | 8  | 8  | 6  | 6  |
| 31        | 100  | -  | 9  | 9  | 8  | 7  |
| 32        | 100  | -  | 24 | 29 | 26 | 24 |
| 33        | 100  | -  | 17 | 19 | 16 | 15 |
| 34        | 92.5 | -  | 32 | 33 | 24 | 24 |
| 35        | 100  | -  | -  | -  | -  | 22 |
| 36        | 100  | -  | -  | -  | -  | 16 |
| 39        | 90.6 | -  | -  | -  | 11 | 13 |
| 40        | 100  | -  | -  | -  | 14 | 15 |
| 41        | 100  | 8  | 8  | 8  | 7  | 6  |
| 42        | 92.5 | 24 | 25 | 23 | 20 | 19 |
| 43        | 92.5 | 21 | 20 | 20 | 17 | 16 |

As shown in Table 4-4, annual mean NO<sub>2</sub> concentrations were above the AQAL (40µg/m<sup>3</sup>) at monitor 25 from 2020-2023. No exceedances of the annual mean NO<sub>2</sub> AQAL were recorded at the presented monitors between 2020-2024. Monitors closest to the Site, i.e. 39 & 40, recorded NO<sub>2</sub> concentrations 'well-below' (i.e. <75%) the annual mean AQAL in 2023 and 2024.

The reduction in annual mean NO<sub>2</sub> concentrations across the period presented, where data is available and excluding 2020 and 2021, demonstrates local improvements in NO<sub>2</sub> concentrations at these roadside locations, correlating to national projections.

The empirical relationship given in LAQM.TG(22) states that exceedances of the 1-hour mean NO<sub>2</sub> AQAL are unlikely to occur where annual mean concentrations are <60µg/m<sup>3</sup>. This indicates that an exceedance of the 1-hour mean AQAL was unlikely to have occurred at the presented monitoring locations.

#### 4.2.3 Defra Mapped Background Concentrations

Defra maintains a nationwide model of existing and future background air quality concentrations at a 1km<sup>2</sup> grid square resolution which is routinely used to support LAQM requirements and air quality assessments. The data sets include annual average concentration estimates for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> using a reference year of 2021 (the year in which comparisons between modelling and monitoring are made).

The Defra mapped background concentrations for the base year (2024) and the earliest predicted opening year of the Proposed Development (2026) are presented in Table 4-5 for the grid square containing the Site.

All of the mapped background concentrations presented are 'well-below' (i.e. <75%) the respective annual mean AQALs.

**Table 4-5: Defra Mapped Background Pollutant Concentrations**

| Grid Square (X, Y) (m) | Year | Annual Mean Concentration (µg/m <sup>3</sup> ) |                  |                   |
|------------------------|------|------------------------------------------------|------------------|-------------------|
|                        |      | NO <sub>2</sub>                                | PM <sub>10</sub> | PM <sub>2.5</sub> |
| 385500, 161500         | 2024 | 5.4                                            | 11.1             | 6.6               |
|                        | 2026 | 5.1                                            | 10.9             | 6.4               |
| 385500, 160500         | 2024 | 6.9                                            | 11.4             | 6.7               |



| Grid Square (X, Y) (m) | Year | Annual Mean Concentration ( $\mu\text{g}/\text{m}^3$ ) |                  |                   |
|------------------------|------|--------------------------------------------------------|------------------|-------------------|
|                        |      | NO <sub>2</sub>                                        | PM <sub>10</sub> | PM <sub>2.5</sub> |
|                        | 2026 | 6.6                                                    | 11.2             | 6.6               |
| <b>AQAL</b>            |      | <b>40</b>                                              | <b>40</b>        | <b>20</b>         |



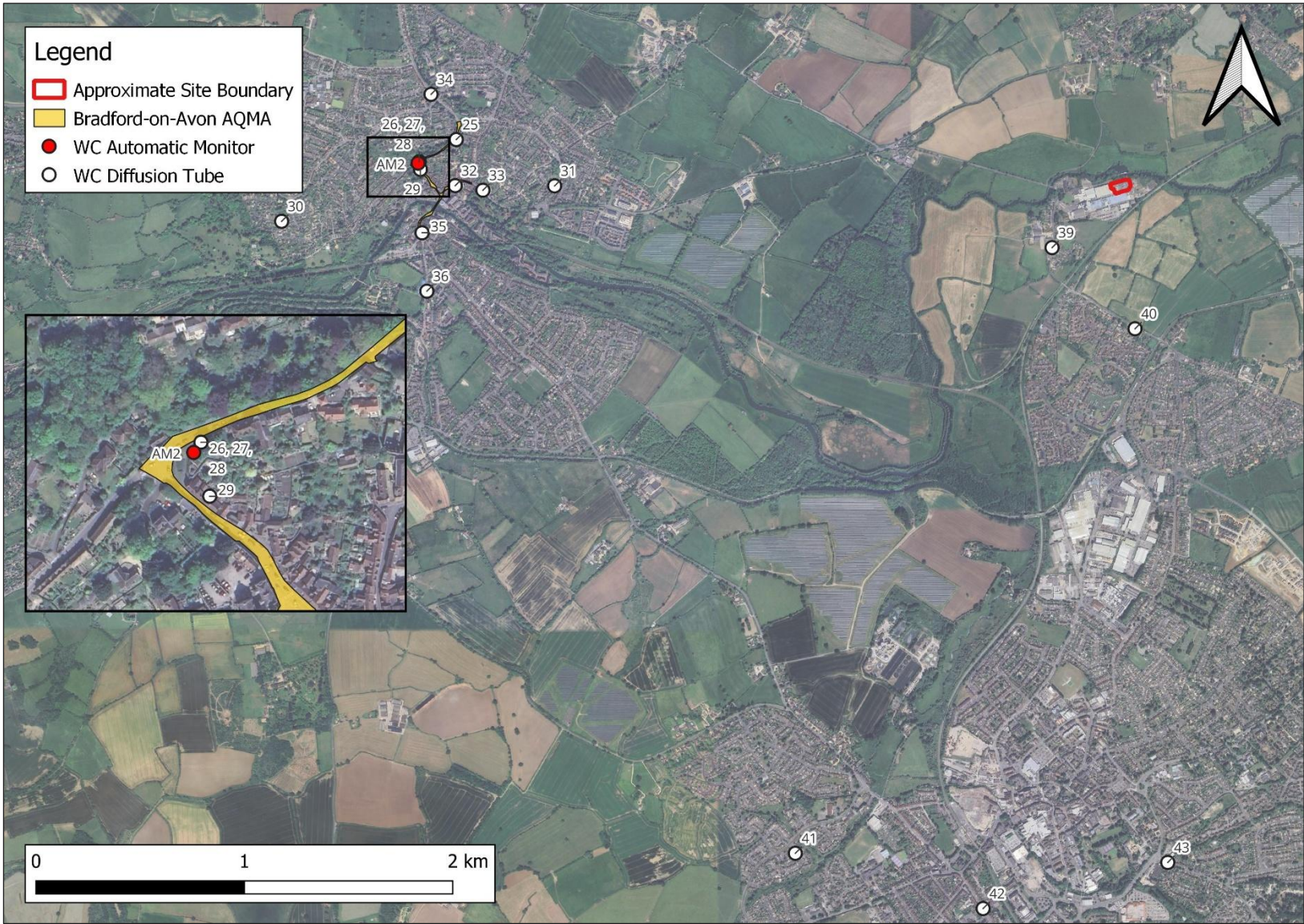


Figure 4-1: Site Setting and Monitoring Locations



## 5.0 Construction Phase Assessment

This section presents the potential air quality impacts and effects associated with the construction phase of the Proposed Development.

### 5.1 Construction Dust Assessment

Where figures relating to area and volume of the Site, approximate number of construction vehicles or distances to receptors are given, these relate to thresholds as defined in the IAQM Construction Dust guidance to guide the assessor to define the dust emissions magnitude and sensitivity of the area.

#### 5.1.1 Assessment Screening

There are human receptors within 250m of the Site and within 50m of the roads up to 250m from the Site entrance anticipated to witness construction traffic movements. There are no designated ecological sites within 50m of the Site or within 50m of the same roads. Therefore, only an assessment of construction dust on human receptors is required.

#### 5.1.2 Potential Dust Emissions Magnitude

##### 5.1.2.1 Demolition

The Site currently comprises some minor existing structures that may require demolition, with a total building volume of  $<12,000\text{m}^3$ . Any demolition activities are likely to occur  $<6\text{m}$  above the ground. As such, the dust emission magnitude for demolition is therefore considered to be 'small'.

##### 5.1.2.2 Earthworks

The total Site area associated with the Proposed Development which require earthworks is estimated to be  $<18,000\text{m}^2$ . It is also estimated that  $<5$  heavy earth-moving vehicles could be active at any one time. As such, the dust emission magnitude for earthworks is therefore considered to be 'small'.

##### 5.1.2.3 Construction

The total building volume associated with the Proposed Development is estimated to be  $12,000\text{--}75,000\text{m}^3$ . As such, the dust emission magnitude for construction is therefore considered to be 'medium'.

##### 5.1.2.4 Trackout

Construction vehicles are not anticipated to travel over unpaved ground and trackout mud and dirt onto the public highway. As such, consideration of impacts associated with trackout have been scoped out of the assessment.

##### 5.1.2.5 Summary

A summary of the potential dust emission magnitude for each of the activities is displayed in Table 5-1.

**Table 5-1: Potential Dust Emission Magnitude**

| Activity   | Dust Emission Magnitude |
|------------|-------------------------|
| Demolition | Small                   |
| Earthworks | Small                   |



| Activity     | Dust Emission Magnitude |
|--------------|-------------------------|
| Construction | Medium                  |

### 5.1.3 Sensitivity of the Area

#### 5.1.3.1 Dust Soiling Impacts

There are estimated to be >1 'medium' sensitivity receptors (commercial properties associated with the existing Cereal Partners UK site included as a conservative measure) within 20m of the Site.

The sensitivity of the area with respect to dust soiling effects on people and property is therefore considered to be 'medium' in relation to demolition, earthworks and construction.

#### 5.1.3.2 Human Health Impacts

The maximum background PM<sub>10</sub> concentration for the 1km<sup>2</sup> grid squares which cover the development is estimated to be 11.4µg/m<sup>3</sup>, based upon 2024 mapped background estimates (i.e. falls into the <24µg/m<sup>3</sup> class). Furthermore, there are estimated to be >1 'low' sensitivity receptors (public footpaths) within 100m of the Site.

The sensitivity of the area with respect to human health impacts is therefore considered to be 'low' in relation to demolition, earthworks and construction.

#### 5.1.3.3 Summary

A summary of the sensitivity of the area defined for each potential impact is displayed in Table 5-2, whereas the spatial densities of receptors discussed in relation to the Site boundary and access routes are illustrated in Figure 5-1.

**Table 5-2: Sensitivity of the Area**

| Potential Impact | Demolition | Earthworks | Construction |
|------------------|------------|------------|--------------|
| Dust Soiling     | Medium     | Medium     | Medium       |
| Human Health     | Low        | Low        | Low          |

### 5.1.4 Risk of Impacts (Unmitigated)

The outcome of the assessment of the potential 'magnitude of dust emissions', and the 'sensitivity of the area' are combined in Table 5-3 below to determine the risk of impact which is used to inform the selection of appropriate mitigation.

**Table 5-3: Risk of Dust Impacts (Unmitigated)**

| Potential Impact | Demolition | Earthworks | Construction |
|------------------|------------|------------|--------------|
| Dust Soiling     | Low Risk   | Low Risk   | Medium Risk  |
| Human Health     | Negligible | Negligible | Low Risk     |



### **5.1.5 Mitigation**

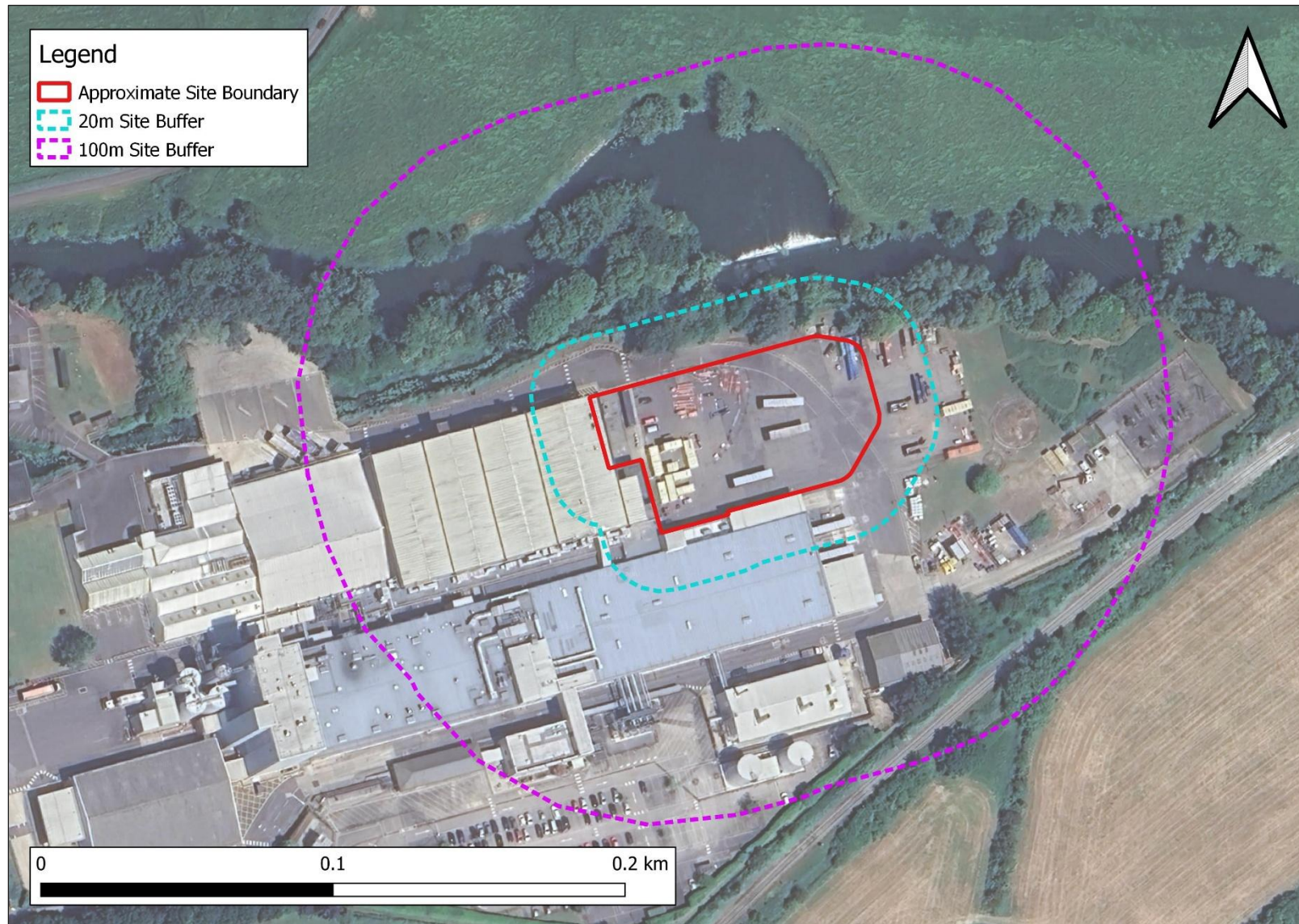
Following the construction dust assessment, the Site is found to be at worst:

- Medium risk in relation to dust soiling effects on people and property; and
- Low risk in relation to human health impacts.

However, potential dust effects during the construction phase are considered to be temporary in nature and may only arise at particular times (i.e. certain activities and/or meteorological conditions).

As a consequence of the identified dust risk, best practice mitigation measures are required to minimise or eliminate potential impacts. These are outlined in Section 7.1. Provided these measures are effectively implemented, the residual effects are considered not significant.





**Figure 5-1: Construction Dust Assessment Buffers**



## 6.0 Operational Phase Assessment

This section presents the potential air quality impacts and effects associated with the operation of the Proposed Development.

SLR Transport and Mobility Planning, the project's transport consultant, has provided operational phase trip generation and distributions for the Proposed Development.

### 6.1 Road Traffic Screening Assessment

#### 6.1.1 Human Receptors

The additional vehicle trips associated with the Proposed Development has been compared to the EPIC & IAQM screening criteria in Table 6-1.

**Table 6-1: Human Road Traffic Screening**

| Road Link                                                 | Vehicle Trips (AADT) |            |
|-----------------------------------------------------------|----------------------|------------|
|                                                           | LDV                  | HDV        |
| Maximum                                                   | 64                   | 42         |
| <b>EPIC &amp; IAQM Screening Criteria outside an AQMA</b> | <b>500</b>           | <b>100</b> |
| <b>EPIC &amp; IAQM Screening Criteria within an AQMA</b>  | <b>100</b>           | <b>25</b>  |

LDV and HDV trips are found to be below the relevant EPIC & IAQM indicative screening criteria for outside an AQMA.

Vehicle trips are predicted to distribute further onto the road network northeastwards toward the existing Cereal Partners Melksham site and towards the M4 motorway where no AQMAs are present. As such, LDV and HDV trips are also found to be below the relevant EPIC & IAQM indicative screening criteria for within an AQMA, including within the Bradford-on-Avon AQMA.

Therefore, road traffic impacts can be concluded to result in an insignificant effect on air quality in relation to human receptors. Further assessment is not required.

#### 6.1.2 Ecological Receptors

An initial spatial review of the affected road network has been undertaken to identify designated ecological sites located within 200m of roads potentially impacted by additional vehicle trips associated with the Proposed Development. This includes the Great Bradford Wood Ancient Woodland (AW).

Vehicle trips within this study area have been screened against the thresholds set out in the IAQM Nature guidance (see Table 6-2).

The assessment considers traffic associated with the Proposed Development alone based on the designation of the Great Bradford Wood AW and, in the absence of distribution data, assumes all additional vehicle trips associated with the Proposed Development occur within 200m of the Great Bradford Wood AW; this is expected to result in a conservative and robust assessment.



**Table 6-2: Ecological Road Traffic Screening**

| Site                                  | Designation | Relevant Road Links                     | Project-Alone Vehicle Trips (AADT) |                    |
|---------------------------------------|-------------|-----------------------------------------|------------------------------------|--------------------|
|                                       |             |                                         | Total                              | HDV <sup>(A)</sup> |
| Great Bradford Wood                   | AW          | B3105 New Terrace (west of Site access) | 106                                | 42                 |
| <b>IAQM Nature Screening Criteria</b> |             |                                         | <b>1,000</b>                       | <b>200</b>         |

Vehicle trips associated with the Proposed Development, as project-alone, fall below the IAQM Nature screening criteria for relevant designated sites. Therefore, road traffic impacts can be concluded to result in an insignificant effect on air quality in relation to ecological receptors. Further assessment is not required.



## 7.0 Mitigation Measures

This section presents any proportionate mitigation measures required during the construction and operational phases of the Proposed Development.

### 7.1 Construction Dust

As discussed in Section 5.0, construction impacts associated with the Proposed Development would result in the generation of dust and PM<sub>10</sub>.

In order to control potential impacts, Table 7-1 presents a range of mitigation measures which could be applied and align with the IAQM Construction Dust guidance. With the effective application of the dust mitigation measures, residual effects will be not significant.

While the IAQM Construction Dust guidance is primarily aimed at PM<sub>10</sub> and dust soiling, the recommended measures will also have a direct effect on controlling PM<sub>2.5</sub> emissions and associated impacts.

**Table 7-1: Construction Dust Mitigation Measures**

| Site Application          | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                 |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Highly Recommended</b> |                                                                                                                                                                                                                                                                                                                                                                     |
| Communications            | Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.                                                                                                                                                                                                                                           |
|                           | 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.                                                                                                                                                                                                                                                                                                            |
|                           | Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority. The level of detail will depend on the risk and should include as a minimum the highly recommended measures in this document. The desirable measures should be included as appropriate for the site.                    |
| Construction              | Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.                                                                                                                                       |
| 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.                                                                                                                                                                                                                                                                                  |
| Monitoring                | Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the local authority when asked.                                                                                                                                                                                           |
|                           | 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.                                                                                                                              |
|                           | Ensure all vehicles switch off engines when stationary - no idling vehicles.                                                                                                                                                                                                                                                                                        |



| Site Application                                   | Mitigation Measures                                                                                                                                                                                            |
|----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Operating Vehicle/Machinery and Sustainable Travel | 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 and appropriate.                                              |
|                                                    | Use enclosed chutes and conveyors and covered skips.                                                                                                                                                           |
|                                                    | Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.                                       |
| 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.                                                                                         |
|                                                    | Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site.                                                                              |
|                                                    | Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.                                                                  |
|                                                    | Avoid site runoff of water or mud.                                                                                                                                                                             |
|                                                    | Keep site fencing, barriers and scaffolding clean using wet methods.                                                                                                                                           |
|                                                    | Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below.                                |
|                                                    | Cover, seed or fence stockpiles to prevent wind whipping.                                                                                                                                                      |
| 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.                                                  |
| Waste Management                                   | Avoid bonfires and burning of waste materials.                                                                                                                                                                 |
| Desirable                                          |                                                                                                                                                                                                                |
| Construction                                       | Avoid scabbling (roughening of concrete surfaces) if possible.                                                                                                                                                 |
|                                                    | Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery. |
|                                                    | For smaller supplies of fine power materials ensure bags are sealed after use and stored appropriately to prevent dust.                                                                                        |
| Demolition                                         | Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).                                                      |
| Monitoring                                         | Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log                                                    |



| Site Application                                   | Mitigation Measures                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                    | available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100m of site boundary, with cleaning to be provided if necessary.                                                                                                                           |
| Operating Vehicle/Machinery and Sustainable Travel | Impose and signpost a maximum-speed-limit of 15mph on surfaced and 10mph on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate). |
|                                                    | Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).                                                                                                                                                                                                                              |
| Operations                                         | Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.                                                                                                                                                                               |

## 7.2 Operational Phase

Road traffic impacts associated with the operation of the Proposed Development can be considered as having an insignificant effect on local air quality with regard to human and ecological receptors. As such, no further mitigation measures are considered necessary.

## 7.3 WC Air Quality SPD Requirements

Notwithstanding the above, the WC Air Quality SPD requires the Proposed Development to implement Type 1 and Type 2 mitigation measures (see Section 3.0). These are as follows:

- EV charging requirements;
- Construction Environmental Management Plan (CEMP); and
- Low Emission Travel Plan.

The WC Air Quality SPD notes that commercial developments require 20% electric vehicle charging point (EVCP) provision, regardless of the provisions outlined in Approved Document S<sup>22</sup> of the building regulations. The specific detail for such will come forward post-planning as a building control requirement.

The dust control measures presented in Section 7.1 can be integrated into a Construction Environmental Management Plan (CEMP) / Dust Management Plan (DMP), or similar, for adherence during construction as part of the contractor's environmental responsibilities and commitments.

A Low Emission Travel Plan will be produced which includes a number of low-emissions measures aimed to encourage users to use more sustainable modes of transport to and from the Site. These measures would subsequently have a knock-on effect in terms of reducing road traffic emissions from personal car use. The Low Emission Travel Plan is expected to be secured via planning condition.

<sup>22</sup> Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities, Infrastructure for charging electric vehicles: Approved Document S, (2023). Available at: <https://www.gov.uk/government/publications/infrastructure-for-charging-electric-vehicles-approved-document-s>.



## 8.0 Conclusions

SLR has been commissioned by Cereal Partners UK to undertake an air quality assessment in support of the planning application for a proposed factory building located at the existing Cereal Partners UK site in Staverton.

### 8.1 Construction Phase

On the basis of the assessment presented in Section 5.0, construction impacts associated with the Proposed Development would result in the generation of dust and PM<sub>10</sub>.

In order to control potential impacts, a range of mitigation measures which could be applied and aligned with the IAQM Construction Dust guidance are presented in Section 7.1. With the effective application of these measures, residual effects will be not significant.

### 8.2 Operational Phase

On the basis of the assessment presented in Section 6.0, impacts associated with the operation of the Proposed Development can be considered as having an insignificant effect on local air quality in relation to human and ecological receptors. No further mitigation is therefore considered necessary.

Nevertheless, Type 1 and Type 2 mitigation measures in accordance with the development classification set out in local guidance, are presented in Section 7.2.



