



Damask Way, Warminster

Air Quality Assessment

Backhouse Housing Limited

Prepared by:

SLR Consulting Limited

3rd Floor, Summit House, 12 Red Lion Square, London, WC1R 4QH

SLR Project No.: 425.066850.00001

Client Reference No: UK.134171

20 March 2026

Revision: 2.0

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1.0	30 May 2025	DW	OP	MM
2.0	20 March 2026	DW	MM	MM

Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Backhouse Housing Limited (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.



Table of Contents

1.0 Introduction	1
1.1 Scope of Assessment.....	1
2.0 Background Context	2
2.1 Legislation	2
2.2 Policy	5
2.3 Guidance.....	7
3.0 Assessment Methodology	9
3.1 Development Classification	9
3.2 Construction Phase	9
3.3 Operational Phase.....	10
4.0 Baseline Environment.....	12
4.1 Baseline Air Quality	12
5.0 Construction Phase Assessment.....	14
5.1 Construction Dust Assessment.....	14
6.0 Operational Phase Assessment	18
6.1 Road Traffic Screening Assessment.....	18
6.2 Site-Suitability Assessment	20
7.0 Mitigation Measures	22
7.1 Construction Dust.....	22
7.2 Operational Phase.....	24
8.0 Conclusions.....	26
8.1 Construction Phase	26
8.2 Operational Phase.....	26

Tables in Text

Table 2-1: Relevant Ambient AQALs (England).....	3
Table 2-2: Human Health Relevant Exposure	3
Table 4-1: Defra Mapped Background Pollutant Concentrations.....	13
Table 5-1: Potential Dust Emissions Magnitude.....	14
Table 5-2: Sensitivity of the Area	15
Table 5-3: Risk of Dust Impacts (Unmitigated).....	16
Table 6-1: Human Receptor Road Traffic Screening	18
Table 6-2: Review of Ecological Designations.....	18
Table 6-3: JNCC DMT Assessment.....	19
Table 6-4: JNCC Distance-Based Threshold Assessment – NOx	19



Table 6-5: JNCC Distance-Based Threshold Assessment – Ammonia	19
Table 6-6: JNCC Distance-Based Threshold Assessment – Nitrogen Deposition	20
Table 6-7: IAQM Nature Screening Assessment.....	20
Table 7-1: Construction Dust Mitigation Measures.....	22

Figures in Text

Figure A: Construction Dust Assessment Buffers.....	17
---	----



1.0 Introduction

SLR Consulting Ltd (SLR) has been commissioned by Backhouse Housing Limited to undertake an air quality assessment to appraise an Outline Planning Application (OPA) for the proposed residential development (the 'Proposed Development') located at Damask Way, Warminster (the 'Site').

The Proposed Development is described below:

"Outline planning permission for residential development of up to 49 dwellings with associated access, parking, internal roads, public open space, landscape planting, ground level re-profiling and associated infrastructure and works. All matters reserved except for access"

The Site was the subject of a previous OPA (Wiltshire Council (WC) planning reference: 17/12348/OUT) for 28no. dwellings. The application was approved by WC in 2019, however the subsequent Reserved Matters Application (RMA) was withdrawn following an unresolved highways objection; there was no objection on air quality grounds.

The Site is located at the approximate National Grid Reference (NGR): x387750, y144130 within WC's administrative area and is bounded by:

- Vacant land consisting of meadows, hedgerows and trees to the north;
- Vacant land (as above) to the east, with Smallbrook Road beyond;
- Residential dwellings to the south, with Upper Marsh Road, Lower Marsh Road, Smallbrook Road and agricultural land beyond; and
- Residential dwellings off Damask Way to the west.

Vehicular access to the Site will be via Upper Marsh Road.

1.1 Scope of Assessment

Pre-assessment consultation was undertaken with the Environmental Health Officer (EHO) at WC¹ to agree the scope and methodology of the air quality assessment. However, at the time of writing no response to the proposed scope of works has been received. The following scope has been undertaken, as proposed to the EHO:

- Baseline Evaluation;
- Construction Phase Assessment;
- Operational Phase Assessment; and
- Mitigation Measures.

The energy strategy associated with the Proposed Development will incorporate an all-electric approach consisting of air-source heat pumps (ASHP) and solar photovoltaic (PV) panels, in compliance with Approved Document Part L: Conservation of Fuel and Power of the Building Regulations². Reference should be made to the submitted energy strategy for further information. As such, an assessment of potential air quality impacts associated with on-site energy systems during the operational phase of the Proposed Development has been scoped out.

¹ Email from SLR to the Public Protection Services department at WC, dated 22nd April 2025.

² Ministry of Housing, Communities and Local Government, Conservation of Fuel and Power: Approved Document L: Available at: <https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l>.



2.0 Background Context

2.1 Legislation

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

2.1.1 National Obligations

The Air Quality Standards Regulations 2010³ (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)⁴. 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 2020⁵ was introduced to mirror revisions to supporting EU legislation. As a result, the fine particulate matter (PM_{2.5}) Limit Value is 20µg/m³ (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.

2.1.1.1 Environmental Targets (Fine Particulate Matter) Regulations

The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023⁶ introduced an annual mean concentration target of 10µg/m³ to be met across England by 2040. Central Government is responsible for meeting this future target, whereas Local Authorities have no statutory obligation to achieve this target.

2.1.2 Local Obligations

Part IV of the Environment Act 1995 (as amended by the Environment Act 2021) requires the Secretary of State to publish a 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 England.

PM_{2.5} is not currently cited within the Regulations. However, as per the AQS, Local Authorities are required to work towards reducing PM_{2.5}. To support this, the Department for

³ The Air Quality Standards Regulations (England) 2010, Statutory Instrument No 1001, The Stationary Office Limited.

⁴ Schedule 1 of the 2010 AQSR provides the locations of the sampling points where the AQSR Limits Values can be assessed.

⁵ The Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020, Statutory Instrument No. 1313, The Stationary Office Limited.

⁶ The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023. UK Statutory Instruments 2023 No. 96.



Environment, Food and Rural Affairs (Defra) released '*PM_{2.5} Targets: Interim Planning Guidance*'⁷ which Local Authorities are encouraged to apply when determining planning applications, to ensure national obligations are considered.

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 (defined 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 2023⁸. 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 to 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_{2.5} AQSR AQAL has, however, also been included for completeness, to provide an indicative assessment.

Table 2-1: Relevant Ambient AQALs (England)

Pollutant	AQAL (µg/m ³)	Averaging Period
Nitrogen Dioxide (NO ₂)	40	Annual mean
	200	1-hour mean (not to be exceeded on more than 18 occasions per annum)
Particles (PM ₁₀)	40	Annual mean
	50	24-hour mean (not to be exceeded on more than 35 occasions per annum)
PM _{2.5}	20	Annual mean
Note: The PM _{2.5} AQAL is not prescribed within the Air Quality (England) Regulations 2000 / 2002 and there is no requirement for local authorities to meet it. Exceedances are only valid at the AQSR specific siting locations (Schedule 1: AQSR).		

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 Hotels Gardens of residences 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

⁷ Defra, PM_{2.5} Targets: Interim Planning Guidance, (2024).

⁸ 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 1990⁹ 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. Proposed developments which result in the introduction of future sensitive receptors are however subject to the Agent of Change principle to ensure potential interactions with the existing environment and operations are assessed and mitigated to minimise restrictions being placed on existing businesses.

Fractions of dust greater than 10µm (i.e. greater than PM₁₀) in diameter typically relate to nuisance effects as opposed to potential health effects. 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 Conservation of Habitats and Species Regulations 2017 (the ‘Habitats Regulations’)¹⁰ introduces the precautionary principle for protected European sites, i.e. that projects can only be permitted to proceed; having ascertained that there will be no adverse effect on the integrity of the designated site. European sites include Special Areas of Conservation (SAC) and Special Protection Areas (SPA). These regulations were subsequently amended in 2019 to make them operable from 1st January 2021 despite the UK’s withdrawal from the EU¹¹.

Other sites of international significance are Ramsar sites, which are wetlands protected under the 1971 Ramsar Convention¹². Many of these sites in the UK were initially selected on the basis of their importance to waterbirds and are therefore also classified as SPAs.

The Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way (CROW) Act 2000)¹³ 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.

⁹ The Environmental Protection Act 1990, (1990). Available at: <http://www.legislation.gov.uk/ukpga/1990/43/contents>.

¹⁰ UK Government, Statutory Instrument No. 490, The Conservation of Habitats and Species Regulations, (2017).

¹¹ UK Government, The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations, (2019).

¹² Ramsar Convention on Wetlands of International Importance Especially as Waterfowl Habitat, (1971).

¹³ UK Government, Wildlife and Countryside Act, (1981).



The Environment Act 1995 and the Natural Environment and Rural Communities Act (NERC) 2006¹⁴ 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_e) and Critical Loads (CL_o). 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.

2.2 Policy

2.2.1 National Policy

2.2.1.1 Clean Air Strategy

The 2019 Clean Air Strategy¹⁵ sets out the Government's proposals aimed at delivering cleaner air in England and indicates how devolved administrations intend to make emissions reductions. It sets out the comprehensive action that is required from across all parts of government and society to deliver clean air.

2.2.1.2 Environmental Improvement Plan 2023

The 2023 Environmental Improvement Plan¹⁶ is the first revision of the UK Government's 25 Year Environmental Plan (25YEP) – planned on a five-year rolling cycle. This document sets out the 5-year delivery plan to improve the natural environment. The 2023 Environmental Improvement Plan builds on the 2019 Clean Air Strategy by setting environmental targets and commitments to reduce air pollution. Goal 2 of the 25YEP is Clean Air – which relates to improving air quality.

2.2.1.3 National Planning Policy Framework

The December 2024 version of the National Planning Policy Framework¹⁷ (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

¹⁴ UK Government, Natural Environment and Rural Communities Act, (2006).

¹⁵ Defra, The Clean Air Strategy, (2019).

¹⁶ Defra, Environmental Improvement Plan 2023, (2023).

¹⁷ Ministry of Housing, Communities & Local Government, National Planning Policy Framework, (2024).



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)¹⁸ 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 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 Strategy¹⁹ 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*

¹⁸ Ministry of Housing, Communities and Local Government, Planning Practice Guidance: Air Quality, (2019).

¹⁹ WC, Wiltshire Core Strategy, (2015).



- 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 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 [...]

2.3 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))²⁰;
- Defra: PM_{2.5} Targets, Interim Planning Guidance (the ‘PM_{2.5} Interim guidance’);
- 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 Quality²¹ (the ‘EPIC & IAQM guidance’);
- IAQM: Guidance on the Assessment of Dust from Demolition and Construction²² (the ‘IAQM Construction Dust guidance’);

²⁰ Defra in partnership with the Scottish Government, Welsh Government and Department of Agriculture, Environment and Rural Affairs, Local Air Quality Management Technical Guidance 22, (2022).

²¹ EPIC (previously EPUK) & IAQM, Land-Use Planning and Development Control: Planning for Air Quality, v1.2, (2017).

²² IAQM, Guidance on the Assessment of Dust from Demolition and Construction, v2.2, (2024).



- IAQM: A Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites²³ (the 'IAQM Nature guidance'); and
- Joint Nature Conservation Committee (JNCC): Guidance on Decision-making Thresholds for Air Pollution²⁴ (the 'JNCC guidance'); and
- Natural England: Air Pollution and Development: Advice for Local Authorities²⁵ (the 'Natural England guidance')
- WC: Wiltshire Council Air Quality Supplementary Planning Document²⁶ (the 'WC SPD').

²³ IAQM, A Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites v1.1, (2020).

²⁴ JNCC, Guidance on Decision-Making Thresholds for Air Pollution, JNCC Report No.696 (Main Report), (2021).

²⁵ Natural England, Air Pollution and Development: Advice for Local Authorities, (2025). Available at: <https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities>

²⁶ WC, Wiltshire Council Air Quality Supplementary Planning Document, (2023).



3.0 Assessment Methodology

3.1 Development Classification

The requirements of the air quality assessment are dependent on the classification of the Proposed Development (i.e. Type 1, Type 2 or Type 3) in accordance with the WC SPD.

The Proposed Development comprises up to 49 no. residential dwellings (i.e. <100 units) and therefore meets the 'Type 1' classification.

The air quality assessment requirements associated with Type 1 classification as follows:

- EV charging requirements;
- Construction Environmental Management Plan (CEMP); and
- Exposure Mitigation (if applicable).

These items have been discussed in Section 7.0.

3.2 Construction Phase

A construction dust assessment has been undertaken in accordance with IAQM 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 PM₁₀; and
- Harm to ecological receptors.

The first stage of the assessment involves a screening review to determine if there are sensitive receptors within threshold distances of the Site and 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 access(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 access(s).

The dust emission class (or magnitude) for each activity is determined on the basis of the guidance, indicative thresholds and professional judgment 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 to be 'not significant'.

Given the short-term nature of the construction phase and the comparatively low volume of vehicle movements that will likely arise (when compared to the operational phase, for which a screening assessment has been undertaken), it is unlikely that significant air quality effects from development related road traffic emissions during the construction phase will arise.



Such potential effects have therefore been scoped out from requiring detailed assessment based on their assumed 'insignificant' effect.

3.3 Operational Phase

3.3.1 Road Traffic Impacts

3.3.1.1 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 (i.e. outside an AQMA) are as follows:

- A change of Light-Duty Vehicle (LDV) flows of more than 500 Average Annual Daily Traffic (AADT); and/or
- A change of Heavy-Duty Vehicle (HDV) flows of more than 100 AADT.

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

3.3.1.2 Ecological Receptors

Various screening approaches can be applied when assessing potential air quality effects on ecological designations in relation to operational road traffic emissions associated with the Proposed Development. In acknowledgment of this, both the Natural England advice and the IAQM Nature guidance have been applied where relevant.

It is recognised that Natural England's advice applies to European designations (habitats sites) and SSSIs, whereas the IAQM Nature guidance applies to all other national and local ecological designations which are afforded lesser protection than the former.

Both approaches initially comprise identifying all ecological designations located <200m of any road link expected to experience a change in traffic flows as a result of the Proposed Development. If all affected roads are >200m from a protected site, no further assessment is required.

With regard to European designations and SSSIs, following the identification of relevant ecological receptors, the Natural England guidance requires a screening assessment of development trips against decision-making thresholds (DMT) in relation to existing baseline flows (during the year when the assessment is carried out). The DMT is designed to determine instances where project-alone impacts are nugatory and no further assessment is required. The DMT for road traffic emissions is defined as <0.15% of existing AADT. If the DMT is exceeded, in-combination trips are screened against the road-relevant distance-based thresholds. Below these thresholds, in-combination impacts are not considered to result in an exceedance of 1% of the CLe or CLo and no further assessment is required.

With regard to other national and local designations, following the identification of relevant ecological receptors, the IAQM Nature guidance requires a screening assessment of development trips against the following thresholds:

- >1,000 total AADT; and
- >200 HDV AADT.

The outcomes of the above will determine whether impacts associated with the Proposed Development could result in 'no likely significant effect' on habitats sites, 'no adverse effect'



on SSSIs and 'insignificant' effects on all other designations – providing the location of the screened ecological receptor can be validated.

3.3.2 Site-Suitability

An exposure assessment is required to assess the likely exposure that future occupants associated with the Proposed Development may experience to ensure the Site is suitable for its intended use.

As part of the site-suitability assessment, a review of NO₂, PM₁₀ and PM_{2.5} concentrations has been undertaken. The assessment also considers the following with regard to the recommendations of the EPIC & IAQM guidance and the PM_{2.5} IPG:

- The background and future baseline air quality and whether this will likely approach or exceed an AQAL with reference to existing monitoring or modelling data in the vicinity of the Site;
- The presence and location of an AQMA as an indicator of local hotspots where the AQALs may be exceeded;
- The presence of a heavily trafficked road, with emissions that could give rise to sufficiently high concentrations of pollutants, which could cause unacceptably high exposure for users of the Proposed Development; and
- The proximity of PM_{2.5} emissions sources to newly introduced areas of relevant exposure within the new development that could result in adverse impacts associated with exposure to high PM_{2.5} concentrations.

3.3.2.1 Assessing Significance

To determine the significance of predicted air quality impacts based upon a site-suitability assessment, the EPIC & IAQM guidance states:

“Where the air quality is such that an air quality objective at the building façade is not met, the effect on residents or occupants will be judged as significant, unless provision is made to reduce their exposure by some means.”

In line with this, likely pollutant concentrations at the Site are compared to the AQALs to determine whether further consideration is required or whether effects can be considered 'not significant'.



4.0 Baseline Environment

4.1 Baseline Air Quality

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 ASR²⁷, 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.

4.1.1 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 NO₂ AQAL. The closest AQMA to the Site is the 'Westbury AQMA' which is located c. 6.6km to the north.

Given the separation distance between the Site and the Westbury AQMA, no further consideration has been given to AQMAs within this assessment.

4.1.2 Review of Air Quality Monitoring

4.1.2.1 Automatic Air Quality Monitoring

From a review of both local and national automatic monitoring networks, there are three automatic monitors within WC's administrative area.

The nearest automatic monitor to the Site is 'AM2 – Bradford on Avon' which is located c.17.6km to the north. Given the separation distance between this monitor and the Site and the differences in local characteristics, comparable pollutant concentrations are not anticipated. Therefore, no further consideration has been given to the WC automatic monitoring network within this assessment.

4.1.2.2 Diffusion Tube Monitoring

Passive NO₂ diffusion tube monitoring is currently undertaken by WC within the wider authority area.

However, as with the automatic monitors noted above, none of the diffusion tube monitors are situated in proximity to the Site and the closest monitor is located approximately 5.9km to the north. Given the separation distance between the WC diffusion tube monitors and the Site and the differences in local characteristics, comparable pollutant concentrations are not anticipated. Therefore, no further consideration has been given to the WC diffusion tube monitoring network within this assessment.

4.1.3 Defra Mapped Background Concentrations

Defra maintains a nationwide model²⁸ of existing and future background air quality concentrations at a 1km grid square resolution which is routinely used to support LAQM requirements and air quality assessments. The data sets include annual average

²⁷ WC, 2024 Air Quality Annual Status Report, (2024).

²⁸ Defra, Background Maps (2021-Reference). Available at: <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2021>.



concentration estimates for NO₂, PM₁₀ and PM_{2.5} using a reference year of 2021 (the year in which comparisons between modelled and monitored concentrations are made).

The annual mean background concentrations of NO₂, PM₁₀ and PM_{2.5} at the Site for 2024 (baseline year) and 2027 (earliest anticipated occupational year) are 'well-below' (i.e. <75%) the respective annual mean AQALs and are presented in Table 4-1.

Ambient NO₂, PM₁₀ and PM_{2.5} annual mean concentrations are expected to decline further when accounting for national trends, such as improvements to the national vehicle fleet.

Table 4-1: Defra Mapped Background Pollutant Concentrations

Grid Square (X, Y) (m)	Year	Annual Mean Concentration (µg/m ³)		
		NO ₂	PM ₁₀	PM _{2.5}
387500, 144500	2024	5.4	10.7	6.7
	2027	4.9	10.4	6.4
AQAL		40	40	20



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 area sensitivity.

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 exit anticipated to witness construction traffic movements (herein referred to as 'trackout routes'). There are also ecological designations within 50m of the Site, but not within 50m of the same roads. Therefore, an assessment of construction dust on human and ecological receptors is required

5.1.2 Potential Dust Emissions Magnitude

5.1.2.1 Demolition

The Site currently comprises vacant land with no buildings or structures that require demolition. As such, consideration of impacts associated with demolition activities have been scoped out of the assessment.

5.1.2.2 Earthworks

The total Site area estimated to require earthworks is between 18,000m²-110,000m² and between 5-10 heavy earth moving vehicles could be active at any one time. The dust emission magnitude for earthworks is therefore considered to be 'medium'.

5.1.2.3 Construction

The total building volume associated with the Proposed Development is estimated to be between 12,000m³-75,000m³. The construction materials are likely to include concrete and brick which have the potential to be moderately dusty. The dust emission magnitude for construction is therefore considered to be 'medium'.

5.1.2.4 Trackout

Construction vehicles are expected to access the Site via Upper Marsh Road. No details are available at the time of assessment regarding the number of HDV movements associated with construction works. However, the peak number of predicted outward HDV movements is estimated to be <50 per day. In addition, the unpaved road length is likely to be <100m at any given time assuming the access road is paved. The dust emission magnitude for trackout is therefore considered to be 'medium'.

5.1.2.5 Summary

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

Table 5-1: Potential Dust Emissions Magnitude

Activity	Dust Emission Magnitude
Earthworks	Medium



Activity	Dust Emission Magnitude
Construction	Medium
Trackout	Medium

5.1.3 Sensitivity of the Area

5.1.3.1 Dust Soiling Impacts

There is estimated to be 10-100 'high' sensitivity receptors (residential dwellings) within 20m of the Site and within 20m of the Site access route up to 250m from the Site access (assuming that vehicles travel northwest along Upper Marsh Road when leaving the Site).

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

5.1.3.2 Human Health Impacts

The maximum 2023 mapped background PM₁₀ concentration for the 1km² grid square covering the Site (see Section 4.1.3) is estimated to be 10.7µg/m³ (i.e. falls into the <24µg/m³ class).

Given the above information regarding the number and nature of surrounding receptors within specified screening distances of the Site boundary, the sensitivity of the area with respect to human health impacts in relation to earthworks, construction and trackout is considered to be 'low'.

5.1.3.3 Ecological Impacts

The Smallbrook Meadows LNR is located within 50m of the northern Site boundary; the designation is considered to be of 'low' sensitivity to dust impacts.

The sensitivity of the area with respect to ecological impacts is considered to be 'low' in relation to earthworks, construction and trackout.

5.1.3.4 Summary

A summary of the sensitivity of the surrounding area is detailed in Table 5-2, whilst the spatial density of nearby receptors is provided in Figure A.

Table 5-2: Sensitivity of the Area

Potential Impact	Sensitivity of Surrounding Area		
	Earthworks	Construction	Trackout
Dust Soiling	High	High	High
Human Health	Low	Low	Low
Ecological	Low	Low	n/a

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 unmitigated risk of impact which is used to inform the selection of appropriate mitigation.



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

Potential Impact	Earthworks	Construction	Trackout
Dust Soiling	Medium Risk	Medium Risk	Medium Risk
Human Health	Low Risk	Low Risk	Low Risk
Ecological	Low Risk	Low Risk	n/a

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;
- Low risk in relation to human health impacts; and
- Low Risk in relation to ecological 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).

Despite 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 A: 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.

The below assessments are based on the extent of the traffic data provided by the project's transport consultant, Rappor.

6.1 Road Traffic Screening Assessment

6.1.1 Human Receptors

The operational phase trip generation is compared to EPIC & IAQM screening criteria in Table 6-1.

Table 6-1: Human Receptor Road Traffic Screening

Road Link	Proposed Development (AADT)	
	LDV	HDV
Total	330	0
EPIC & IAQM Screening Criteria outside an AQMA	500	100

Based on the above, additional operational phase trips generated by the Proposed Development are found to be below the relevant EPIC & IAQM screening criteria and can be concluded to result in an insignificant effect on air quality. Therefore, further assessment is not required.

6.1.2 Ecological Receptors

Table 6-2 presents the ecological designations which have been identified as being <200m of any road link expected to experience a change in traffic flows as a result of the Proposed Development.

Table 6-2: Review of Ecological Designations

ID	Site	Designation Level	Affected Road <200m
01	River Avon	SAC	Smallbrook Road
02	River Avon System	SSSI	
03	Smallbrook Meadows	LNR	

6.1.2.1 European and SSSI Designations

Table 6-3 presents the assessment of development trips against the JNCC DMT based on the road links identified in Table 6-2.



Table 6-3: JNCC DMT Assessment

ID	Site	Designation	Affected Road <200m	Project- Alone	2026 Baseline	DMT AADT	Below DMT?
				Total AADT			
01	River Avon	SAC	Smallbrook Road	40	659	1	No
02	River Avon System	SSSI					

Table 6-3 shows that development trips on Smallbrook Road are >0.15% of the 2026 baseline flows. Further assessment against the road-relevant distance-based threshold approach is required.

For these road links, Table 6-4 to Table 6-6 presents the assessment of development trips against the JNCC distance-based thresholds for NO_x, ammonia and nitrogen deposition. Where required, habitat-specific CLe and CLo have been sourced from the Air Pollution Information System (APIS) website²⁹.

Table 6-4: JNCC Distance-Based Threshold Assessment – NO_x

ID	Site	Designation	Affected Road <200m	In-Combination Trips (AADT)	Distance from Road Band (m)	Distance-Based Threshold (AADT)	Below Threshold?
01	River Avon	SAC	Smallbrook Road	62	25-50	547	Yes
02	River Avon System	SSSI		62	25-50	547	Yes

Table 6-5: JNCC Distance-Based Threshold Assessment – Ammonia

ID	Site	Designation	Affected Road <200m	In-combination Trips (AADT)	Distance from Road Band (m)	Distance-Based Threshold (AADT) ^(A)	Below Threshold?
01	River Avon	SAC	Smallbrook Road	62	25-50	731	Yes
02	River Avon System	SSSI		62	25-50	731	Yes

Note:

^(A) Based on the location-specific data from APIS and precautionary principles, 1µg/m³ has been applied as the ammonia concentration CLe for all habitats within the considered ecological designations.

²⁹ APIS, <http://www.apis.ac.uk/srcl>.



Table 6-6: JNCC Distance-Based Threshold Assessment – Nitrogen Deposition

ID	Site	Designation	Affected Road <200m	In-combination Trips (AADT)	Distance from Road Band (m)	Distance-Based Threshold (AADT)	Below Threshold?
01	River Avon	SAC	Smallbrook Road	62	25-50	717 (A, B)	Yes
02	River Avon System	SSSI		62	25-50	717 (A, B)	Yes
Notes: (A) The distance-based threshold is based on the ‘deposition to short vegetation’ category. (B) Based on the location-specific data from APIS, 10kgN/ha/yr has been applied as the nitrogen deposition CLo for the relevant habitats within the considered ecological designations (i.e. broadleaved deciduous woodland).							

Table 6-4 to Table 6-6 show that, in-combination trips are below the habitat-specific distance-based thresholds for NO_x, ammonia and nitrogen deposition at all of the considered ecological designations. Road traffic impacts are therefore not considered to result in an exceedance of the 1% CLe or CLo. No further assessment is required.

On this basis, road traffic impacts associated with the Proposed Development can be classed as having a no likely significant effect on the River Avon SAC, and no adverse effect on the River Avon System SSSI.

6.1.2.2 Other National and Local Designations

Table 6-7 presents the assessment of development trips against the IAQM Nature guidance screening criteria, based on the road links identified in Table 6-2.

Table 6-7: IAQM Nature Screening Assessment

ID	Site	Designation	Affected Road <200m	Project-Alone		Below Threshold?
				Total AADT	HDV AADT	
03	Smallbrook Meadows	LNR	Smallbrook Road	40	0	Yes

Table 6-7 shows that, development trips are below the 1,000 total AADT and 200 HDV AADT screening threshold at the Smallbrook LNR.

On this basis, road traffic impacts associated with the Proposed Development can be classed as having an insignificant effect the Smallbrook Meadows LNR.

6.2 Site-Suitability Assessment

This section presents a qualitative assessment of the suitability of the Site in reference to the proposed residential use. With reference to the information already discussed in Section 4.0, the following has been used to inform the site suitability assessment.

The nearest WC automatic monitor is located c. 17.6km north of the Site and the nearest diffusion tube monitor is located c. 5.9km north of the Site. As such, comparable concentrations are not anticipated. The lack of monitoring undertaken by WC in the vicinity



of the Site suggests that the general Warminster area is not considered to be sensitive to air quality.

The Site is not located within or close to an AQMA and is set back approximately 590m from the nearest B-road, Boreham Road (B3414). In addition, the local roads immediately surrounding the Site, including Upper Marsh Road, Lower Marsh Road, Damask Way and Smallbrook Road, are minor in nature and not believed to be heavily trafficked. Based on this, the Site is more likely to experience background concentrations. Defra mapped background concentrations are 'well-below' the relevant NO₂, PM₁₀ and PM_{2.5} AQALs (i.e. <75%) for the 1km grid square containing the Site in 2024 (base year) and 2027 (earliest anticipated occupational year).

NO₂ concentrations are also expected to decline further when accounting for national trends, such as improvements to the national vehicle fleet, as demonstrated by the decrease in background concentrations noted above.

Furthermore and in reference to the PM_{2.5} Interim guidance, there are no nearby AQMA's designated for exceedances of the annual mean PM_{2.5} AQAL, background PM_{2.5} are 'well-below' the PM_{2.5} AQAL and the 2040 target of 10µg/m³, and there are no sources of PM_{2.5} emissions in the vicinity of the Site.

On the basis of the above, ambient pollutant concentrations are considered to be below the considered relevant long-term and short-term AQALs at the Site. Therefore, the Site is considered to be suitable for the Proposed Development by means of natural ventilation. Overall, site suitability air quality effects are concluded to be not significant in reference to the EPIC & IAQM guidance.



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 to the Proposed Development would result in the generation of dust and PM₁₀.

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. These measures can be integrated into a Construction Environmental Management Plan (CEMP), as per the WC SPD, for adherence during construction as part of the contractor's environmental responsibilities and commitments.

While the IAQM Construction Dust guidance is primarily aimed at PM₁₀ and dust, the recommended measures will also have a direct impact on controlling associated PM_{2.5} emissions.

Table 7-1: Construction Dust Mitigation Measures

Site Application	Mitigation Measures
Highly Recommended	
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.
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.
	Agree dust deposition, dust flux, or real-time PM ₁₀ continuous monitoring locations with the Local Authority. Where possible commence baseline monitoring at least three months before work commences on site or, if it a large site, before work on a phase commences. Further guidance is provided by IAQM on monitoring during demolition, earthworks and construction.
	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.
	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.
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 offsite, and the action taken to resolve the situation in the log book.
Trackout	Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.
	Avoid dry sweeping of large areas.
	Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
	Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.
	Record all inspections of haul routes and any subsequent action in a site log book.



Site Application	Mitigation Measures
	Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowzers and regularly cleaned.
	Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).
	Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.
	Access gates to be located at least 10m from receptors where possible.
	Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.
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.
Earthworks	Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.
	Use Hessian, mulches or tackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable
	Only remove the cover in small areas during work and not all at once.
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 available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and windowsills 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).

7.2 Operational Phase

In accordance with relevant guidance, road traffic impacts associated with the operation of the Proposed Development can be considered as having an insignificant effect on local air quality.

In accordance with relevant guidance, road traffic impacts associated with the Proposed Development can be classed as having a no likely significant effect on the River Avon SAC, no adverse effect on the River Avon System SSSI, and an insignificant effect the Smallbrook Meadows LNR.



Furthermore, the Proposed Development is considered to be acceptable for the proposed residential use and no (exposure) mitigation measures are required. Overall, site suitability air quality effects are concluded to be not significant.

Overall, long-term scheme-specific mitigation measures in relation to operational effects arising from road traffic emissions are therefore not considered to be necessary.

Notwithstanding the above, WC's SPD notes that residential-only developments with off-street and communal parking spaces require 100% electric vehicle charging points (EVCP) provision. The specific detail for such will come forward post-planning as a building control requirement.



8.0 Conclusions

SLR has been commissioned by Backhouse Housing Limited to undertake an air quality assessment to appraise a planning application for the development of up to 49 no. residential dwellings at Damask Way, Warminster.

8.1 Construction Phase

As discussed in Section 5.1, construction impacts associated with the Proposed Development would result in the generation of dust and PM₁₀. In order to control potential impacts, a range of mitigation measures which could be applied and align 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

The assessment of operational phase effects considered impacts on all relevant receptors from road traffic emissions associated with the Proposed Development.

In accordance with the EPIC & IAQM guidance, 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 relevant human receptors.

In accordance with the Natural England guidance, road traffic impacts associated with the operation of the Proposed Development can be considered as having a no likely significant effect on the River Avon SAC, no adverse effect on the River Avon System SSSI, and an insignificant effect the Smallbrook Meadows LNR.

Furthermore, the Site is found to be suitable for its proposed residential use. Unmitigated effects associated with the likely pollutant exposure of future occupants are considered to be not significant.

No further mitigation is therefore considered necessary. However, Section 7.2 identifies WC's parking space EVCP requirements.





Making Sustainability Happen