



Borough Council of Kings Lynn & West Norfolk

Air Quality Response to ExQ AQ31

March 2024

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Document Control Sheet

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1 Introduction & Context

Bureau Veritas have been asked to provide a response to the Examining Authority's question relating to Air Quality Matters as part of the additional matters, issues and questions (MIQs) For the examination (Parts 1 and 2) [Document G24].

This document seeks to respond specifically to 'AQ31' which states:

Does the suggested [Main Modification] MM to Policy E2.1 for the management of the air quality impacts of the WWGA adequately capture the mitigation measures recommended in the Air Quality Technical Note [F51j], particularly in respect of construction management and the air quality mitigation hierarchy?

The Main Modification document sets out the below with regards to Policy E2.1 specifically relating to Air Quality:

Development proposals should be consistent with the Council's Air Quality Management Strategy.

2 Response

It is understood that there is not presently a specific 'Air Quality Management Strategy' enforced by the Council with respect to the West Winch Growth Area. However, the Council have produced, and are in the process of updating, their 'Air Quality Action Plan' (AQAP) as part of their statutory reporting requirements to Defra under the LAQM framework. The AQAP identifies measures and priority actions for reducing concentrations of harmful pollutants within the area, specifically within the Air Quality Management Areas (AQMAs) of Railway Road and Gaywood Clock. This will include considerations in relation to the West Winch Growth Area.

The mitigation measures outlined with the Air Quality Technical Note [F5i] fall into two categories; Construction and Operation.

Construction phase measures as set out within the Air Quality Technical Note are based on best-practice measures contained within the Institute of Air Quality Management (IAQM) guidance document "Guidance on the Assessment of Dust from Demolition and Construction"¹.

With regards to construction phase, it is expected that emissions during construction phases of future development would be managed through the production of an appropriate Construction Dust Management Plan for each individual development which would align with the best practice IAQM guidance. This can be controlled through conditions on individual applications.

With regards to operational mitigation, the air quality technical note discusses the mitigation hierarchy as identified within IAQM's Position Statement 'Mitigation of Development Air Quality Impacts'². This guidance note provides a useful framework for development of mitigation strategies. Through our discussions with the Environmental Health and Planning teams at the Local Authority, it is understood that the strategy for air quality mitigation will be formed around managing sustainable travel at the West Winch development area, thus reducing the traffic and associated emissions as a result of the development.

The encouragement of sustainable travel could be achieved through the use of Sustainable Travel Plans for development and prioritizing access to public transport which could be conditioned through the planning process for individual schemes. Best practice mitigation would be expected at the proposed development, for example:

¹ <https://iaqm.co.uk/wp-content/uploads/2013/02/Construction-Dust-Guidance-Jan-2024.pdf>

² https://iaqm.co.uk/text/position_statements/mitigation_of_development.pdf

- The provision of at least 1 Electric Vehicle (EV) “fast charge” point per 10 residential dwellings and/or 1,000m² of commercial floorspace. Where on-site parking is provided for residential dwellings, EV charging points for each parking space should be made.
- Where development generates significant additional traffic, provision of a detailed travel plan (with provision to measure its implementation and effect) which sets out measures to encourage sustainable means of transport (public, cycling and walking) via subsidised or free-ticketing, improved links to bus stops, improved infrastructure and layouts to improve accessibility and safety.
- All gas-fired boilers to meet a minimum standard of <40mgNO_x/kWh.

This will encourage a modal shift away from single use occupancy vehicles which in turn result in lower emissions within the Air Quality Management Area.

3 Suggested Amendments to Main Modification to Policy E2.1

Should there be scope to further modify policy E2.1 to better capture the mitigation measures set out in the Air Quality Technical note, we would suggest the below.

Development proposals should align with best practice dust and emissions management measures to protect human health and amenity during any demolition and construction phases.

Development proposals will require a detailed air quality assessment where they result in a change in anticipated emissions which are above relevant screening criteria (such as those contained within the IAQM Guidance document “Land-Use Planning & Development Control: Planning for Air Quality”). Developments should align with the priorities identified within the Council’s Air Quality Action Plan and proposals should outline mitigation activities that will be undertaken based on the mitigation hierarchy.