



**AMBITO CARE & EDUCATION
PROPOSED EDUCATIONAL DEVELOPMENT
INGFIELD MANOR DRIVE, BILLINGHURST**

AIR QUALITY ASSESSMENT

APRIL 2026



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Project Code:	29836: Land off Lenton Way(A)9.1
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Ambito Care & Education
Proposed Educational Development
Ingfield Manor Drive, Billinghamurst
Air Quality Assessment

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Appendix A: Proposed Site Layout Plan

Appendix B: Construction Dust Risk Assessment Criteria

Appendix C: Construction Phase Mitigation Measures

1 Introduction

- 1.1 Mayer Brown Limited has been commissioned by Ambito Care & Education to undertake an Air Quality Assessment (AQA) in support of a planning application for a proposed educational development at Ingfield Manor Drive, Five Oaks, Billingshurst, West Sussex, RH14 9AX (hereafter referred to as the proposed development, site or application site).
- 1.2 The local authority responsible for determining the planning application is Horsham District Council (HDC).
- 1.3 The location of the proposed development in relation to the local road network is illustrated in **Figure 1.1** below.

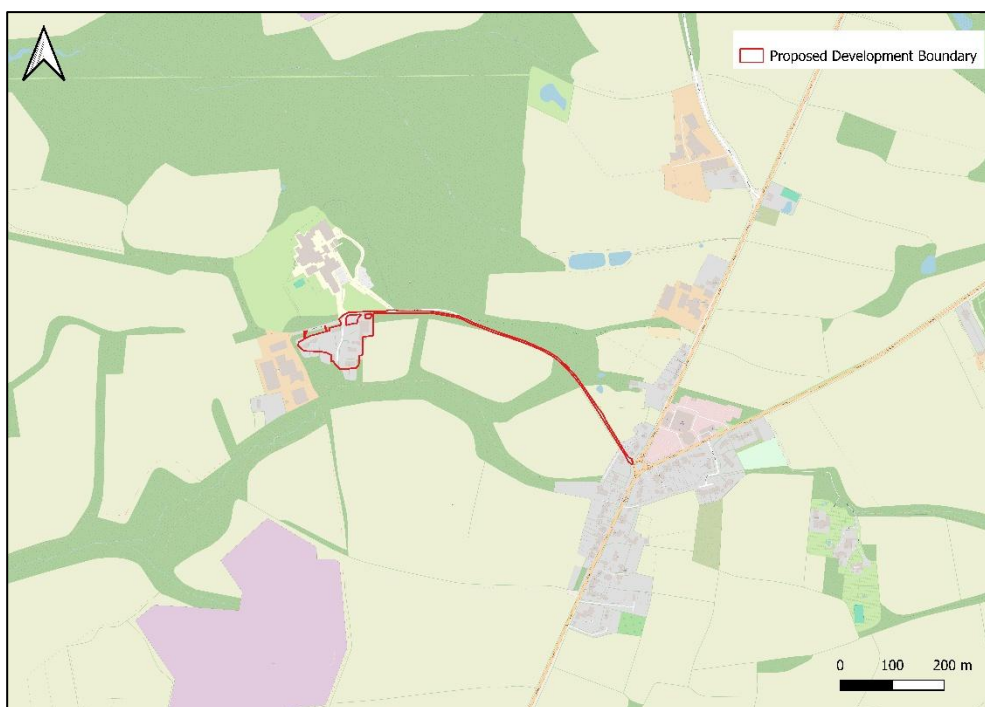


Figure 1.1: Site Location in Relation to the Local Road Network

- 1.4 The existing Ingfield Manor School is located in a secluded rural site, with the access lane passing through the school site to provide access to Slinfoldland Farm to the west. Ingfield Manor School is located on the northern side of the access lane, with the proposed Woodview school site is to the south.
- 1.5 The access lane connects to the A29/A264 roundabout and wider road network at Five Oaks.

- 1.6 The Woodview school site is surrounded by a mixture of open farmland and woodland, with the areas to the north east and south west being designated as Ancient Woodland.
- 1.7 The existing site is illustrated in **Figure 1.2** below.

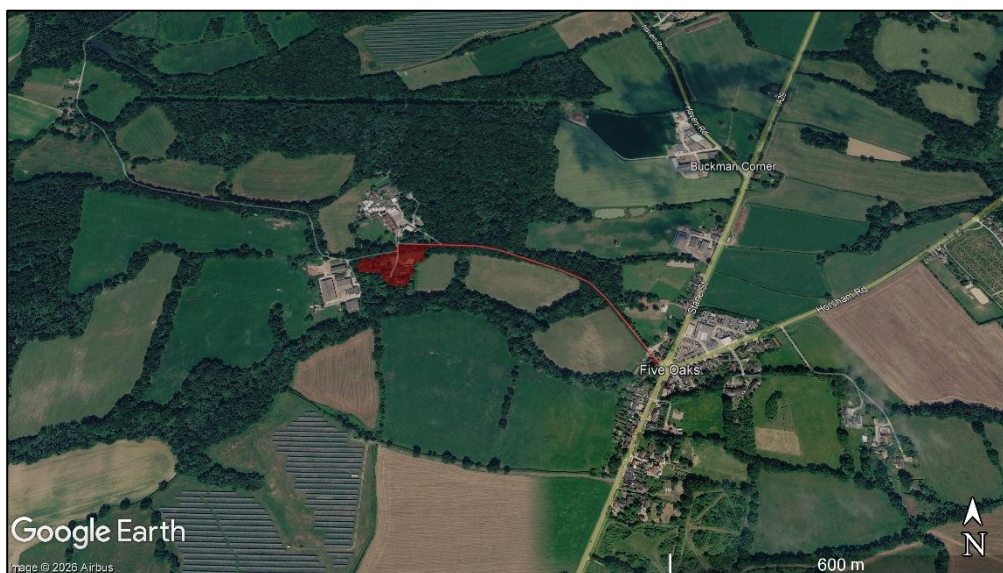


Figure 1.2: Existing Site and Surroundings

- 1.8 The proposals are for the demolition of existing buildings, erection of new school buildings, including sports hall, car parking, outdoor school play area, and associated works.
- 1.9 The latest site layout plan is illustrated in **Appendix A**.
- 1.10 The AQA has been undertaken in order to establish:
- Potential for nuisance, loss of amenity and health impacts associated with the construction phase of the proposed development on sensitive receptors;
 - Baseline conditions at the site using monitored pollutant data from HDC and Defra resources;
 - The potential air quality impact of the proposed development upon existing receptors;
 - Assessing the suitability of the proposed development for the addition of new sensitive receptors;
 - Undertaking an emissions mitigation assessment; and
 - Making recommendations for mitigation measures if required.

1.11 The AQA contains the following sections:

- **Section 2** - Legislation and Policy Context;
- **Section 3** - Scope of Assessment and Methodology;
- **Section 4** - Baseline Conditions;
- **Section 5** - Evaluation of Potential Impacts;
- **Section 6** - Mitigation Measures; and
- **Section 7** - Conclusions.

1.12 The appendices consist of the following:

- **Appendix A** – Latest Indicative Site Plan;
- **Appendix B** - Construction Dust Risk Assessment Methodology; and
- **Appendix C** - Construction Phase Mitigation Measures.

2 Legislation and Policy Context

National

- 2.1 The current UK Air Quality Standards are based upon European Union (EU) limit values (Directive 2008/50/EC¹), which were transposed into English Law when the UK was an EU member state.
- 2.2 The UK government and devolved administrations have a legal responsibility to meet the limit values converted into domestic law through the European Union (Withdrawal) Act 2018. Part IV of the 2021 Environment Act² sets guidelines for protecting air quality in the UK and forms the basis of local air quality management as originally set out in the 1995 Environment Act, which the 2021 Act replaces.
- 2.3 The Environment Act required local authorities in the UK to review air quality in their area periodically and designate Air Quality Management Areas (AQMAs) where the objectives are not being achieved or are not likely to be achieved within the relevant period. Where an AQMA is designated, local authorities are also required to produce an 'Air Quality Action Plan' (AQAP) detailing the pollution reduction measures that need to be adopted to achieve the relevant air quality objectives within an AQMA.
- 2.4 As part of the Environment Act, the UK Government was required to publish a national Air Quality Strategy (AQS) to establish the system of 'local air quality management' (LAQM) for the designation of AQMAs.

[The Air Quality Strategy³](#)

- 2.5 The AQS fulfils the statutory requirement of the Environment Act 1995 as amended by the Environment Act 2021 to publish an AQS every five years, setting out air quality standards, objectives, and measures for improving ambient air quality.
- 2.6 The revised strategy (2023) supersedes Volume 1 of the 2007 air quality strategy in England only.

¹ European Union. (2008), 'Ambient air quality assessment management', Framework Directive 2004/50/EC.

² Parliament of the United Kingdom. (2021), 'Environment Act'

³ Department for Environment, Food & Rural Affairs (DEFRA), (2023), 'Air Quality Strategy: framework for local authority delivery. Available on: [Air quality strategy: framework for local authority delivery - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/air-quality-strategy-framework-for-local-authority-delivery)

- 2.7 The AQS sets out a framework to enable local authorities to deliver for their communities and contribute to the long-term air quality goals, including ambitious new targets for the fine particulate matter fraction known as PM_{2.5}.
- 2.8 The two new targets are:
- 10 µg/m³ annual mean concentration PM_{2.5} nationwide by 2040, with an interim target of 12 µg/m³ by January 2028.
 - 35% reduction in average population exposure by 2040, with an interim target of a 22% reduction by January 2028, both compared to a 2018 baseline.
- 2.9 The new targets should help drive reductions in the worst PM_{2.5} hotspots across the country, whilst ensuring nationwide action to improve air quality.
- 2.10 The AQS sets standards and objectives for pollutants to protect human health, vegetation and ecosystems. The pollutant objectives are the dates by which each standard is to be achieved, taking into account economic considerations, practical and technical feasibility.

Air Quality Objectives

- 2.11 The main air quality pollutants of concern are NO₂, PM₁₀ and PM_{2.5}. The relevant Air Quality Objectives (AQO), as they currently apply are presented in **Table 2.1** below.

Pollutant	AQO		Date to be achieved by (and maintained thereafter)
	Concentration	Measured As	
Nitrogen Dioxide (NO ₂)	200 µg/m ³	1-hour mean not to be exceeded more than 18 times per year	31/12/2005
	40 µg/m ³	Annual mean	31/12/2005
Particles (PM ₁₀)	50 µg/m ³	24-hour mean not to be exceeded more than 35 times per year	31/12/2004
	40 µg/m ³	Annual mean	31/12/2004
Particles (PM _{2.5}) (UK – Except Scotland)	20 µg/m ³	Annual mean	2020
Particles (PM _{2.5}) (England)	12 µg/m ³	Interim annual mean target to be achieved by 2028	2028*
	Target of 22% reduction in average		

Pollutant	AQO		Date to be achieved by (and maintained thereafter)
	Concentration	Measured As	
	population exposure		
	10 µg/m ³	Legally binding nationwide annual mean target to be achieved by 2040	2040**
	Target of 35% reduction in average population exposure		

*Note: Interim PM_{2.5} targets are to be achieved by 2028

**Note: Legally binding PM_{2.5} targets are to be achieved by 2040

Table 2.1: Air Quality Objectives in the UK

The AQO listed in **Table 2.1** are only applicable at locations where a member of the public could be reasonably expected to spend the relevant averaging period. Further examples of this are presented in **Table 2.2** below.

Averaging period	AQO should apply at	AQO should not apply at
Annual	All locations where members of the public might be regularly exposed. Building façades of residential properties, schools, hospitals, care homes etc.	Building façades of offices or other places of work where members of the public do not have regular access. Hotels, unless people live there as their permanent residence. Gardens of residential properties. Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short-term.
24 Hour	All locations where the annual mean objective would apply, together with hotels and gardens of residential properties*.	Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short-term.
1 Hour	All locations where the annual mean and 24 and 8-hour mean objectives apply. Kerbside sites (for example, pavements of busy shopping streets). Those parts of car parks, bus stations and railway stations etc. which are not fully	Kerbside sites where the public would not be expected to have regular access.

Averaging period	AQO should apply at	AQO should not apply at
	enclosed, where members of the public might reasonably be expected to spend one hour or more. Any outdoor locations where members of the public might reasonably have expected to spend one hour or longer.	

*Note: Such locations should represent parts of the garden where relevant public exposure to pollutants is likely, for example where there is seating or play areas. It is unlikely that relevant public exposure to pollutants would occur at the extremities of the garden boundary, or in front gardens, although local judgement should always be applied.

Table 2.2: Examples of where AQO should apply

[National Planning Policy Framework \(NPPF\) 2024⁴](#)

2.12 The most relevant national planning policy guidance to the proposed development is the National Planning Policy Framework (NPPF). The most recent version of the NPPF was published in December 2024 by the Ministry of Housing, Communities & Local Government. This version of the NPPF was subject to a minor update in February 2025.

2.13 The NPPF contains five sections which are relevant to air quality. Section 110 states that:

“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

2.14 Section 187 (e) states that:

“preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels

⁴ Ministry of Housing, Communities and Local Government, (2025), ‘National Planning Policy Framework’, London.

of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information...

2.15 Section 198 states that:

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development."

2.16 Section 199 states that:

"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."

2.17 Section 201 states that:

"The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities."

Planning Practice Guidance – Air Quality⁵

2.18 The Planning Practice Guidance (PPG) is used to support the NPPF and is published online. The guidance on air quality was updated in November 2019. The PPG provides various principles on how planning can take account of the impact of new development on air quality.

2.19 The guidance refers to the specific issues that may need to be considered when assessing air quality impacts. It states:

“Considerations that may be relevant to determining a planning application include whether the development would:

- Lead to changes (including any potential reductions) in vehicle-related emissions in the immediate vicinity of the proposed development or further afield...*
- Introduce new point sources of air pollution...*
- Expose people to harmful concentrations of air pollutants...*
- Give rise to potentially unacceptable impacts (such as dust) during construction for nearby sensitive locations;*
- Have a potential adverse effect on biodiversity...”*

2.20 Guidance on how detailed an air quality assessment need to be is provided and states:

“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...”

2.21 Reference to how air quality can be mitigated states that:

“Mitigation options will need to be locationally specific, will depend on the proposed development and need to be proportionate to the likely impact. It is important that local planning authorities work with the applicants to consider appropriate mitigation so as to ensure new development is appropriate for its location and unacceptable risks are prevented...”

⁵Ministry of Housing, Communities and Local Government, (2019), ‘Planning Practice Guidance-Air Quality’, Ministry of Housing, Communities and Local Government, London. Available on: <https://www.gov.uk/guidance/air-quality--3#history>.

Local Planning Policy

Horsham District Planning Framework⁶

2.22 The adopted Horsham District Planning Framework (HDPF) sets out the planning strategy for the years up to 2031 to deliver the social, economic and environmental needs of the HDPF plan area.

2.23 The HDPF contains one policy which refers to air quality. Policy 24: Environmental Protection states:

“The high quality of the district’s environment will be protected through the planning process and the provision of local guidance documents. Taking into account any relevant Planning Guidance Documents, developments will be expected to minimise exposure to and the emission of pollutants including noise, odour, air and light pollution and ensure that they:

- 1. Address land contamination by promoting the appropriate re-use of sites and requiring the delivery of appropriate remediation;*
- 2. Are appropriate to their location, taking account of ground conditions and land instability;*
- 3. Maintain or improve the environmental quality of any watercourses, groundwater and drinking water supplies, and prevents contaminated run-off to surface water sewers;*
- 4. Minimise the air pollution and greenhouse gas emissions in order to protect human health and the environment;*
- 5. Contribute to the implementation of local Air Quality Action Plans and do not conflict with its objectives;*
- 6. Maintain or reduce the number of people exposed to poor air quality including odour. Consideration should be given to development that will result in new public exposure, particularly where vulnerable people (e.g. the elderly, care homes or schools) would be exposed to the areas of poor air quality; and*

⁶ Horsham District Council (2015), Horsham District Planning Framework

7. Ensure that the cumulative impact of all relevant committed developments is appropriately assessed."

3 Scope of Assessment and Methodology

- 3.1 This section outlines the scope of the assessment and methodology used to assess the magnitude and significance of impacts associated with the proposed development.
- 3.2 **Table 3.1** below summarises the key information sources used in this assessment.

Source	Details
Department for Environment, Food and Rural Affairs (Defra)	Local Air Quality Management (LAQM) – Technical Guidance (TG22)⁷ The LAQM (TG22) supersedes all previous versions. It is designed to support local authorities in carrying out their duties under the Environment Act 1995 as amended by the Environment Act 2021, equivalent Acts passed by the devolved administrations, and subsequent regulations.
	The Local Air Quality Management (LAQM) Tools.⁸ Contain information pertaining to monitoring networks across the UK and provides tools, which aid in the data processing and the estimation of pollutant concentrations with reference to the specific year of study.
	LAQM Background Maps (2021 Reference Year)⁹ These provide mapped estimates of background concentrations for specific pollutants (NO _x , NO ₂ , PM ₁₀ and PM _{2.5}) using a 1x1 km grid. The maps also provide information on how pollutant concentrations change over time or across a wide area, while allowing for the assessment of new pollutant sources that are introduced into an area and the impact they may have upon local air quality.
Institute of Air Quality Management (IAQM)	Guidance on the assessment of Dust from Demolition and Construction (2024 v.2.2)¹⁰ The document provides guidance on how to undertake a construction impact assessment (including demolition and earthworks). The emphasis in the document is on providing the means for classifying the risk of dust impacts from a construction site, which then allows appropriate mitigation measures to be identified.
Environmental Protection UK (EPUK) & IAQM	Land-Use Planning & Development Control: Planning for Air Quality (2017)¹¹ This document provides advice and guidance to ensure that air quality is adequately considered in the land-use planning and development control processes. This is particularly applicable to assessing the effect of changes in exposure of members of the public resulting from residential and mixed-use developments, especially those within urban areas where air quality is poorer.

⁷ Department of Environment, Food and Rural Affairs (Defra). (2022). 'Local Air Quality Management Technical Guidance (TG22)'. Defra, London

⁸ <https://laqm.defra.gov.uk/air-quality/air-quality-assessment/list-of-available-tools/>

⁹ Department of Environment, Food and Rural Affairs (Defra). (2021), 'Background Mapping data for local authorities – 2021', Defra, London. <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018>

¹⁰ IAQM, (2024). 'Guidance on the assessment of dust from demolition and construction v2.2', IAQM, London.

¹¹ Environmental Protection UK & Institute of Air Quality Management (EPUK & IAQM) (2017) Land-Use Planning & Development Control: Planning for Air Quality, EPUK & IAQM, London

Sussex Air	Air quality and emissions mitigation guidance for Sussex¹² This guidance deals with the pollutants from transport which are regulated under the LAQM regime, and the assessment and control of dust during demolition and construction.
Local Authority	Horsham District Council ASR¹³ This Annual Status Report (ASR) highlights the status of the air quality within the district, discussing AQMAs, the monitoring strategy and concentrations of pollutants in the air.

Table 3.1: Key Information Sources

Scope of Air Quality Assessment

- 3.3 This AQA considers the suitability of the site for the proposed use, and assesses whether any significant air quality impacts are anticipated as a result of the construction or operational phases of the proposed development.
- 3.4 A staged assessment approach has been adopted. This ensures that the approach taken for the assessment of risk is proportional to the risk of an unacceptable impact being caused. Where a simple review of the likely impacts associated with the proposed development clearly demonstrates that the risk of a health/annoyance impact is negligible, this will be sufficient to conclude that no further or detailed assessment is necessary.
- 3.5 In cases where the risk involved cannot be regarded as negligible, a more detailed and quantitative assessment will be undertaken.
- 3.6 The specific methodology and impact criteria used in this assessment is detailed below.

Construction Phase

Construction Dust Risk Assessment

- 3.7 The Institute of Air Quality Management (IAQM) published the 'Guidance on the assessment of Dust from Demolition and Construction v2.2' in January 2024. The potential impacts associated with construction activities will be assessed in accordance with this IAQM Guidance.
- 3.8 The IAQM guidance provides a methodology (**Appendix B**) to evaluate potential risk of dust generation for a proposed development and the level of mitigation required. The impact of the development is described using one of

¹² Sussex Air, (2021). 'Air quality and emissions mitigation guidance for Sussex'.

¹³ Horsham District Council, (2025). '2025 Annual Status Report (ASR)'.

the following three categories: 'Low Risk', 'Medium Risk' and 'High Risk'. Based on the risk level, appropriate mitigation measures can be considered to minimise any risk of dust impacts from the construction phase.

- 3.9 In the process of screening the need for a detailed assessment, the following criteria is used:

“An assessment will normally be required where there is:

- *a ‘human receptor’ within:*
 - *250m of the boundary of the site; or*
 - *50m of the route(s) used by construction vehicles on the public highway, up to 250m from the site entrance(s).*
- *an ‘ecological receptor’ within:*
 - *50m of the boundary of the site; or*
 - *50m of the route(s) used by construction vehicles on the public highway, up to 250m from the site entrance(s).”*

- 3.10 There are a number of human receptors within 250m of the site boundary and ecological receptors within 50m of the site boundary. A construction dust assessment has therefore been scoped in.

Construction Traffic Emissions

- 3.11 Due to the size of the proposed development and the nature of construction works; construction traffic volumes will be relatively low within the context of existing traffic flows and will fall below the criteria for significant changes in traffic flow outlined in **Table 3.3**. The proposed development is not located within or adjacent to an AQMA, so has less stringent criteria for construction traffic volumes.

- 3.12 A detailed assessment of the potential impact of construction traffic emissions upon existing receptors can therefore be scoped out.

Operational Phase

Building Plant Emissions

- 3.13 It is understood that the heating and hot water needs of the proposed development will be met through fully electric means.

- 3.14 A detailed assessment of building plant emissions can therefore be scoped out.

Operational Traffic Emissions

- 3.15 The EPUK & IAQM Guidance – ‘Planning for Air Quality’ has been used to assess potential traffic impacts associated with the development.
- 3.16 **Table 3.3** below provides the criteria used for screening the need for an Air Quality Assessment.

The Development will:	Indicative Criteria to Proceed to an Air Quality Assessment
Cause a significant change in Light Duty Vehicle (LDV) traffic flows on local roads with relevant receptors. (LDV = cars and small vans <3.5t gross vehicle weight).	A change of LDV flows of: - more than 100 AADT within or adjacent to an AQMA - more than 500 AADT elsewhere.
Cause a significant change in Heavy Duty Vehicle (HDV) flows on local roads with relevant receptors. (HDV = goods vehicles + buses >3.5t gross vehicle weight).	A change of HDV flows of: - more than 25 AADT within or adjacent to an AQMA - more than 100 AADT elsewhere.
Realign roads, i.e. changing the proximity of receptors to traffic lanes	Where the change is 5m or more and the road is within an AQMA
Introduce a new junction or remove an existing junction near to relevant receptors	Applies to junctions that cause traffic to significantly change vehicle accelerate/decelerate, e.g. traffic lights, or roundabouts.
Introduce or change a bus station	Where bus flows will change by: - more than 25 AADT within or adjacent to an AQMA - more than 100 AADT elsewhere
Have an underground car park with extraction system	The ventilation extract for the car park will be within 20m of a relevant receptor. Coupled with the car park having more than 100 movements per day (total in and out)

Table 3.3: Indicative Criteria for Requiring an Air Quality Assessment

- 3.17 The proposed development is not located within or adjacent to an AQMA, therefore the less stringent criteria apply.
- 3.18 The scheme transport consultants, Motion, have confirmed that trip generation associated with the proposed development will not exceed the less stringent criteria above on any road link.
- 3.19 All of the other indicative criteria in **Table 3.3** will be met. A detailed assessment of the potential impact of road source emissions upon existing receptors can hence be scoped out.

[Site Suitability](#)

- 3.20 This report will assess the suitability of the proposed development for the addition of new sensitive receptors, in the form of educational use.

4 Baseline Conditions

Local Air Quality Management

- 4.1 The proposed development site is entirely within HDC and does not lie within any declared AQMA.

Background

- 4.2 The Defra mapping tool (reference year 2021) has been used to present the pollutant background concentrations. The proposed buildings fall in the 1x1km grid squares X:509500, Y:128500.
- 4.3 The NO₂, PM₁₀ and PM_{2.5} annual mean background concentrations for 2026, the earliest year of occupation, are provided in **Table 4.1** below.

Pollutant	2026 (µg/m ³)
NO ₂	6.4
PM ₁₀	10.1
PM _{2.5}	6.0

Table 4.1: Defra Annual Mean Background Concentrations for 2026

Local Monitoring

- 4.4 In July 2025, HDC published its latest Air Quality ASR which provides annual mean monitoring data.

Automatic Monitoring

- 4.5 HDC currently operates three automatic monitoring stations in its district. The site location in relation to the automatic monitoring stations is illustrated in **Figure 4.1** below.

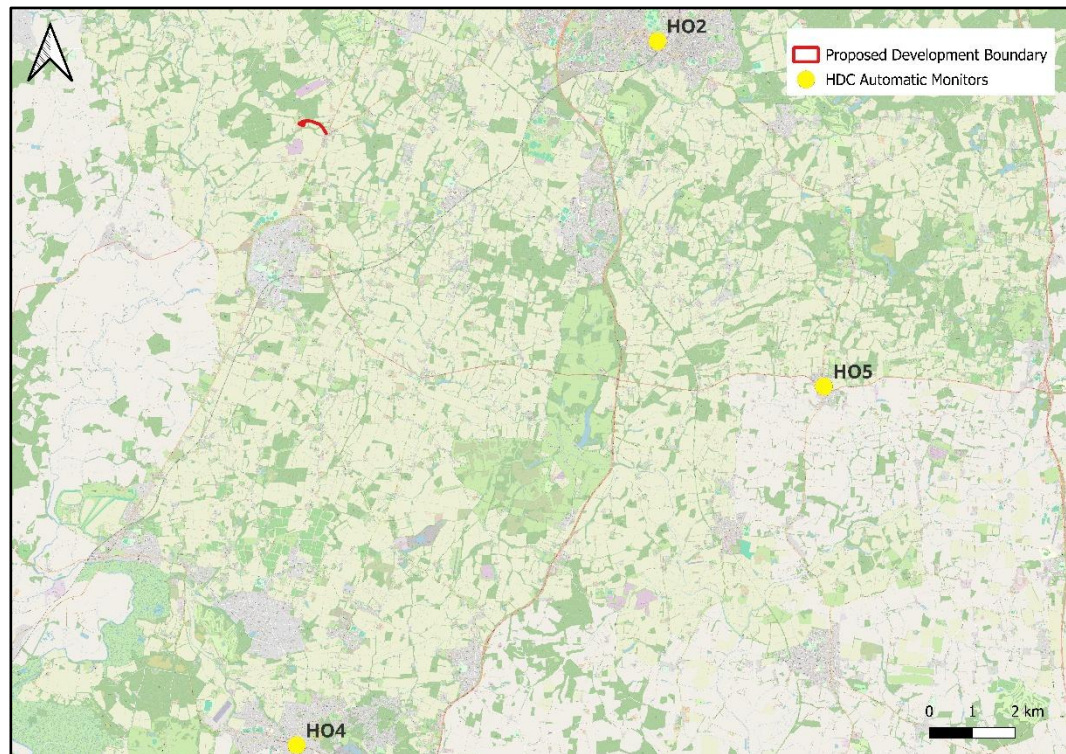


Figure 4.1: Site Location in Relation to the Automatic Monitoring Locations

- 4.6 The automatic monitors are not considered representative due to their distance from the site and have not been considered further.

Non-Automatic Monitoring

- 4.7 HDC undertakes non-automatic monitoring of NO₂ at 47 locations across the district. The site location in relation to the closest non-automatic monitoring locations is illustrated in **Figure 4.2** below.

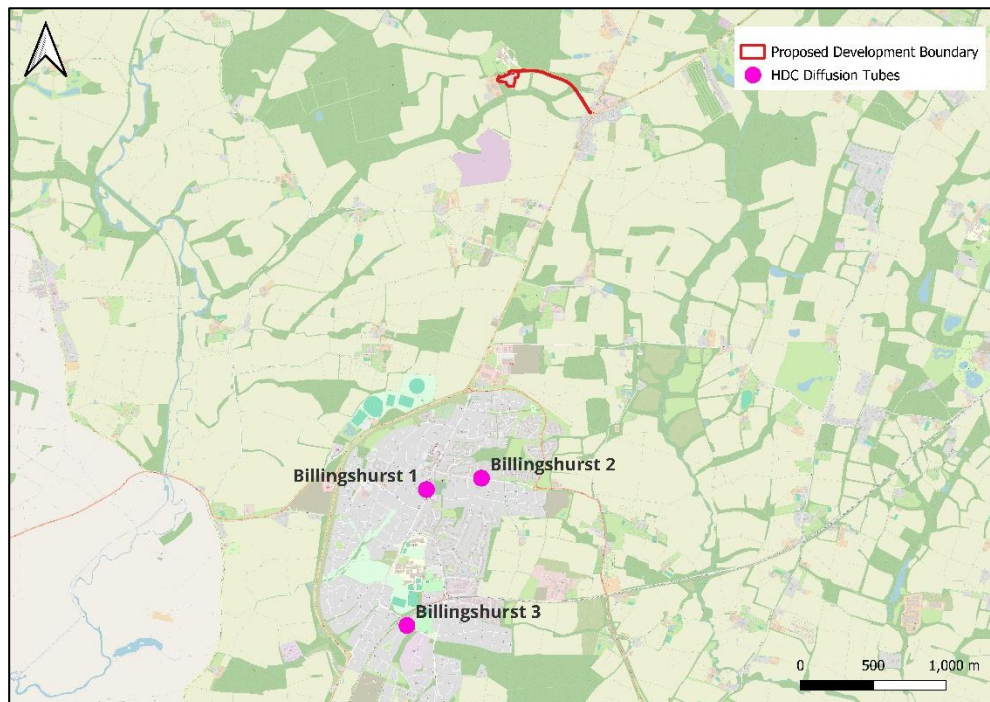


Figure 4.2: Site Location in Relation to the Non-Automatic Monitoring Locations

- 4.8 The diffusion tubes are not considered representative due to their distance from the site and have not been considered further.

Baseline Summary

- 4.9 In the absence of representative monitoring data, the annual mean concentrations presented in **Table 4.1** have been used to inform ambient NO₂, PM₁₀ and PM_{2.5} concentrations at the proposed development site.

5 Evaluation of Potential Impacts

Construction Phase

Construction Dust Risk Assessment

- 5.1 During the construction phases, there is the potential for emissions of dust to cause annoyance, nuisance and health effects to sensitive receptors, both human and ecological, located close to the site.
- 5.2 The construction activities associated with the proposed development have been separated into four activities:
- Demolition;
 - Earthworks;
 - Construction; and
 - Trackout.
- 5.3 The assessment of the risk of dust impacts has been completed in two stages:
- Determine the potential dust emission magnitude for each activity; and
 - Determine the sensitivity of the area to dust impacts.
- 5.4 The potential dust emission magnitude for all four activities has been determined to be either Small, Medium or Large according to the criteria presented in **Table B.1** in **Appendix B**.
- 5.5 The dust emission magnitudes relevant to the construction of the proposed development are shown in **Table 5.1** below.

Construction Activity	Dust Emission Magnitude	Justification
Demolition	Small	The total building volume to be demolished is below 12,000 m ² .
Earthworks	Small	The total earthworks site area is below 18,000 m ² .
Construction	Medium	The building to be constructed has an estimated total building volume between 12,000 and 75,000 m ³ .
Trackout	Small	Due to the scale of the site and works there will be an estimated peak of below 20 HDV outwards movements in any one day.

Table 5.1: Dust Emission Magnitudes

- 5.6 The sensitivity of the area has been assessed in relation to a number of factors such as the specific sensitivities of receptors in the area, the proximity and number of those receptors and the ambient PM₁₀ concentration.
- 5.7 When defining the magnitude of receptor sensitivity, the criteria within **Table B.2** to **Table B.5** in **Appendix B** are used.
- 5.8 In addition to these criteria, the IAQM guidance following site-specific factors have been taken into account when defining the sensitivity of the area:
- Any history of dust generating activities in the area;
 - The likelihood of concurrent dust generating activity on nearby sites;
 - Any pre-existing screening between the source and the receptors; and
 - The duration of the potential impact, as a receptor may become more sensitive over time.
- 5.9 There is no history of significant dust generating activities in the area and no likelihood of significant dust impacts on the receptors identified from concurrent activities.
- 5.10 There is no pre-existing screening between the site and receptors which would offer significant mitigation and there are no known changes to the receptors which would affect sensitivity over the duration of the construction period.
- 5.11 **Figure 5.1** shows the construction dust risk assessment buffers based on the recommended distances by IAQM.

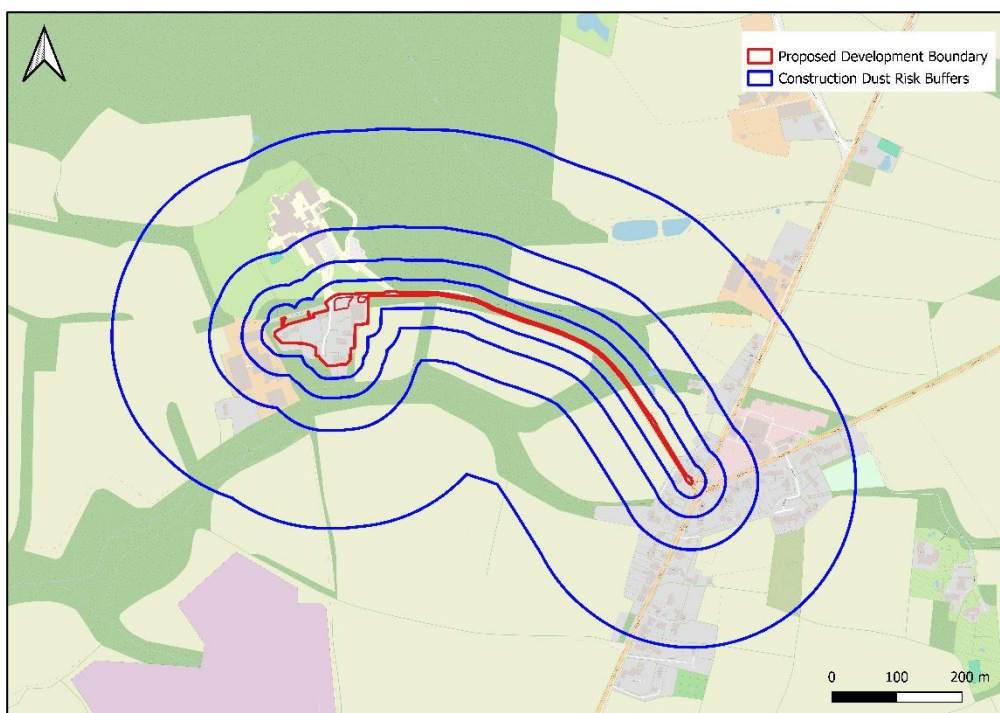


Figure 5.1: Construction Dust Risk Assessment Buffers

5.12 The sensitivity of the area assessment has been completed based on the following:

- Over 100 'high' sensitivity receptors within 50m;
- Ancient woodlands (Low sensitivity ecological receptor) within 50m of the site boundary; and
- Low PM₁₀ background.

5.13 The sensitivity of the area is presented in **Table 5.2** below.

Receptor Sensitivity	Sensitivity of the Surrounding Area			
	Demolition	Earthworks	Construction	Trackout
Dust Soiling	High	High	High	High
Human Health	Medium	Medium	Medium	Medium
Ecological	Low	Low	Low	Low

Table 5.2: Sensitivity of the Surrounding Area

5.14 The overall risk of dust soiling and human health impacts are calculated by combining the dust emission magnitude for each activity (**Table 5.1**) with the receptor sensitivity (**Table 5.2**) using **Table B.6** to **Table B.9** in **Appendix B**.

5.15 The completed pre-mitigation risks are presented in Table 5.3 below.

Potential Impact	Risk			
	Demolition	Earthworks	Construction	Trackout
Dust Soiling	Medium	Low	Medium	Low
Human Health	Low	Low	Medium	Negligible
Ecological	Negligible	Negligible	Low	Negligible

Table 5.3: Summary of Dust Risk (pre-mitigation)

- 5.16 The pre-mitigation risk of dust soiling during demolition and construction is **Medium**, whilst during earthworks and trackout is **Low**.
- 5.17 The pre-mitigation risk to human health during construction is **Medium**, whilst during demolition and earthworks is **Low** and during trackout is **Negligible**.
- 5.18 The pre-mitigation risk to ecological receptors during construction is **Low**, whilst during demolition, earthworks and trackout is **Negligible**.
- 5.19 Mitigation measures appropriate for the proposed development are discussed in **Section 6** and presented in **Appendix C**.

Operational Phase

Site Suitability

- 5.20 In line with the Sussex Air guidance, a damage cost assessment is required.
- 5.21 The purpose of this assessment is to quantify the monetised health damage value associated with transport emissions from the proposed development. This damage cost assessment has followed the methodology and costs from the Defra Air quality damage cost guidance.
- 5.22 The trip generation was provided by Motion. The total NO_x and PM_{2.5} emissions in tonnes per annum are calculated from traffic flow data using the latest Defra Emission Factor Toolkit (EFT v13.1, March 2025). The EFT Version 13.1 has been developed for the UK by the National Atmospheric Emissions Inventory (NAEI) and Transport for London (TfL). The EFT is based on data collected from a number of sources including the European Environment Agency (EEA) COPERT (Computer Programme to calculate Emissions from Road Transport) emission calculator.
- 5.23 The total NO_x and PM_{2.5} emissions in tonnes per annum are presented below in **Table 5.4**.

5.24 EFT input:

- 66 (daily trips generated by proposed development)
- Urban not London (Road type)
- 0% (HGV%)
- 50kph (from Sussex Air guidance)
- 10km (from Sussex Air guidance).

Pollutant	Year				
	2026	2027	2028	2029	2030
NO_x	0.04007	0.03519	0.03053	0.02617	0.026168
PM_{2.5}	0.00427	0.00418	0.00411	0.00405	0.00405

Table 5.4: Tonnes/annum over five-year period

5.25 Defra have developed damage costs to enable proportionate analysis when assessing air quality. Damage costs are a set of pre-calculated values, which are derived using the more detailed Impact Pathways Approach (IPA). Damage costs are measured per tonne of emission.

5.26 Damage Cost Appraisal Toolkit input:

- Start Year: 2026
- End Year: 2030
- Price Base Year: 2026
- Number of pollutants: 2
- Source: Road Transport.

5.27 **Table 5.5** presents the central present value damage costs associated with the emissions presented in **Table 5.4**.

Central Value (£)	Year				
	2026	2027	2028	2029	2030
NO_x	501	433	370	313	308
PM_{2.5}	386	373	361	351	345

Table 5.5: Damage Costs from Damage Cost Appraisal Toolkit (£)

5.28 The central damage costs represent a best estimation of the current evidence, however there is uncertainty around: the emissions dispersion modelling, the interpretation of changes in air pollution concentrations into impacts and the

valuation of those impacts. To account for this uncertainty a sensitivity range has been developed.

- 5.29 The low sensitivity range incorporates the lower bound concentration response function values, lower bound unit values for the valuation of health impacts and a lower level of life years lost assumed from short term exposure. The high sensitivity range incorporates the higher bound concentration response function values, higher bound unit values for the valuation of health impacts, a higher level of life years lost assumed from short term exposure and additional impact pathways.
- 5.30 In this instance, the Central Present Value was selected in line with Sussex Air Guidance. The total cost for both pollutants is:
- NO_x £1,925; and
 - PM_{2.5} £1,816.
- 5.31 The total five-year damage cost for both pollutants is therefore £3,741.

Site Suitability

- 5.32 The proposed development is educational in use, therefore all of the AQO from **Table 2.1** are applicable.
- 5.33 The site is not located within any declared AQMA. The annual mean concentrations presented in **Table 4.1** have been used to inform ambient NO₂, PM₁₀ and PM_{2.5} concentrations at the proposed development site.
- 5.34 The data presented in **Table 4.1** shows ambient NO₂, PM₁₀ and PM_{2.5} concentrations are well below the applicable AQO.
- 5.35 The proposed development site is more than 500m from the nearest major road, the A29 and unlikely to be significantly affected by road traffic emissions at this distance.
- 5.36 Taking all of the above into account, it is considered unlikely that pollutant concentrations within the site would exceed the relevant AQO, and the proposed end uses for the site are therefore likely to be acceptable.
- Furthermore, a detailed exposure assessment is not considered necessary; nor is baseline monitoring of air quality within the site itself.

6 Mitigation Measures

Construction Phase

Construction Dust

- 6.1 A construction dust risk assessment has been completed for the proposed development in accordance with IAQM guidance. Within the assessment, site specific mitigation measures have been identified which ensure compliance with relevant standards.
- 6.2 The appropriate mitigation measures outlined in **Appendix C** should make up part of a Construction Environmental Management Plan (CEMP) that should be implemented to minimise the potential adverse construction dust impacts throughout all the relevant construction stages.
- 6.3 The proper implementation of these specific mitigation measures within the CEMP will ensure that any potential adverse impacts from construction dust during all construction stages are minimised. It is noted by the IAQM that, through the use of effective mitigation, the residual effects of dust from construction activity are expected to be not significant.
- 6.4 It should be noted that even with a rigorous CEMP in place, it is not possible to guarantee that all mitigation measures will be effective at all times. If there is an interruption in the water supply used for dust suppression or adverse weather conditions are experienced that exacerbate dust emissions, the receptors may experience occasional, short-term dust annoyance.
- 6.5 However, the likely scale of this would not normally be considered sufficient to change the conclusion of this assessment. It is therefore important to consider all mitigation measures and provide a frequent review and assessment procedure at each stage, to ensure that mitigation measures continue to provide the maximum attenuation level possible.

Operational Phase

Emissions Mitigation Statement

- 6.6 As shown above, the total health damage value over five years is £3,741.

6.7 The West Sussex County Council Guidance on Parking at New Developments (September 2020)¹⁴ states:

“Active charging points for electric vehicles should be provided at a minimum of 20% of all parking spaces with ducting provided at all remaining spaces where appropriate to provide ‘passive’ provision for these spaces to be upgraded in future.”

6.8 At least 20% of the parking spaces will have active charging points, with all remaining spaces to have passive provision for future upgrades.

6.9 Ambito Care & Education have agreed to mitigation measures to offset the health damage value of £3,741. **Table 6.1** below provides the itemised costs of these measures to offset the health damage value.

Mitigation Type	Number	Cost Each (£)
Additional EV charge points above default 20%	4	1000

Table 6.1: Itemised Mitigation Measures

6.10 The total value of the itemised mitigation measures is £4000 and considered suitable to offset the damages.

¹⁴ West Sussex County Council. Accessible at: Guidance on Parking at New Developments ([westsussex.gov.uk](https://www.westsussex.gov.uk))

7 Conclusions

- 7.1 The proposed development site is located within Horsham District Council (HDC).
- 7.2 A review of the Air Quality Assessments undertaken by HDC shows the site does not fall within any declared Air Quality Management Area (AQMA).
- 7.3 The AQA has been undertaken in order to establish:
- Potential for nuisance, loss of amenity and health impacts associated with the construction phase of the proposed development on sensitive receptors;
 - Baseline conditions at the site using monitored pollutant data from HDC and Defra resources;
 - The potential air quality impact of the proposed development upon existing receptors;
 - Assessing the suitability of the proposed development for the addition of new sensitive receptors;
 - Undertaking an emissions mitigation assessment; and
 - Making recommendations for mitigation measures if required.
- 7.4 A construction dust risk assessment has been undertaken for the construction activities associated with the proposed development in accordance with IAQM guidance.
- 7.5 Following the successful implementation of the specific mitigation measures detailed in this AQA, the residual effects of construction dust and emissions from construction plant/vehicles upon the local area and sensitive receptors will be temporary and considered to be 'not significant'.
- 7.6 Trip generation associated with the proposed development is not expected to result in a detrimental impact on local air quality or increase pollution levels at existing receptors along the highway network.
- 7.7 Following a review of air quality data, the proposed development is considered suitable for the introduction of educational use.

- 7.8 A damage cost assessment has been undertaken in line with the Sussex Air Guidance. The client has agreed to itemised mitigation measures which exceed the damage costs of £3,751.
- 7.9 It can therefore be concluded that the proposed development is not considered to conflict with national, regional, and local planning guidance, and air quality factors are not considered to be a constraint to planning consent for the development.

Appendix A: Proposed Site Layout Plan



Figure A.1: Proposed Site Layout Plan

Appendix B: Construction Dust Risk Assessment Criteria

Construction Activity	Dust Emission Magnitude Scale		
	Large	Medium	Small
Demolition	Total building volume >75,000 m ³ , potentially dusty construction material (e.g. concrete), on-site crushing and screening, demolition activities >12 m above ground level.	Total building volume 12,000 m ³ – 75,000 m ³ , potentially dusty construction material, demolition activities 6-12 m above ground level.	Total building volume <12,000 m ³ construction
Earthworks	Total site area >110,000 m ² , potentially dusty soil type (e.g. clay, which will be prone to suspension when dry due to small particle size), >10 heavy earth moving vehicles active at any one time, formation of bunds >6 m in height.	Total site area 18,000 m ² –110,000 m ² , moderately dusty soil type (e.g. silt), 5-10 heavy earth moving vehicles active at any one time, formation of bunds 3 m-6 m in height.	Total site area <18,000 m ² , soil type with large grain size (e.g. sand), <5 heavy earth moving vehicles active at any one time, formation of bunds <4 m in height.
Construction	Total building volume >75,000 m ³ , on site concrete batching or sandblasting.	Total building volume 12,000 m ³ – 75,000 m ³ , potentially dusty construction material (e.g. concrete), on site concrete batching.	Total building volume <12,000 m ³ , construction material with low potential for dust release (e.g. metal cladding or timber).
Trackout	>50 HDV (>3.5t) outward movements in any one day, potentially dusty surface material (e.g. high clay content), unpaved road length >100 m.	20-50 HDV (>3.5t) outward movements in any one day, moderately dusty surface material (e.g. high clay content), unpaved road length 50 m–100 m.	<20 HDV (>3.5t) outward movements in any one day, surface material with low potential for dust release, unpaved road length <50 m.
* HDV – Heavy Duty Vehicle (>3.5t), Note – In each case, not all the criteria need to be met, and that other criteria may be used if justified.			

Table B.1: Dust Emission Magnitude Criteria

Area Sensitivity	Human Receptors		Ecological Receptors
	Dust Soiling	Health Effects	
High	Users can reasonably expect enjoyment of a high level of amenity; or the appearance, aesthetics or value of their property would be diminished by soiling; and the people or property would reasonably be expected to be present continuously, or at least regularly for extended periods, as part of the normal pattern of use of the land. indicative examples include dwellings, museums and other culturally important collections, medium and long term car parks and car showrooms.	People would be present continuously, 10-100 dwellings within 20m of the site, exposed over a time period relevant to the air quality objective for PM ₁₀ , very sensitive receptors (e.g. residential properties, hospitals, schools, care homes).	International or national designation, locations where there is a community of a particularly dust sensitive species (e.g. Special Area of Conservation SAC).
Medium	Users would expect to enjoy a reasonable level of amenity, but would not reasonably expect to enjoy the same level of amenity as in their home; or the appearance, aesthetics or value of their property could be diminished by soiling; or the people or property wouldn't	People would not be expected to be present here continuously for extended periods, locations where people exposed are workers and exposure is over a time period relevant to the air quality objective for PM ₁₀ , 1-10 dwellings within 20m of the site, medium sensitive receptors (e.g.	Locations where there is particularly important plant species, national designation where the features may be affected by dust deposition (e.g. Sites of Special Scientific Interest SSSI).

	reasonably be expected to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land. Indicative examples include parks and places of work.	parks, place of work-office and shop workers).	
Low	The enjoyment of amenity would not reasonably be expected; or property would not reasonably be expected to be diminished in appearance, aesthetics or value by soiling; or there is transient exposure, where the people or property would reasonably be expected to be present only for limited periods of time as part of the normal pattern of use of the land. Indicative examples include playing fields, farmland (unless commercially-sensitive horticultural), footpaths, short term car parks and roads.	People would be expected to be present only for limited periods, human exposure is transient, 1 dwelling within 20m of site. Annual mean concentrations well below the national objectives (<28µg/m ³). Low sensitivity receptors (e.g. public footpaths, playing fields, shopping streets).	Locations with a local designation where the features may be affected by dust deposition (e.g. Local Nature Reserve).

Table B.2: IAQM Factors for Defining the Sensitivity of an Area

Receptor Sensitivity	Number of Receptors	Distance from the source (m)			
		<20	<50	<100	<250
High	>100	High	High	Medium	Low
	10-100	High	Medium	Low	Low
	1-10	Medium	Low	Low	Low
Medium	>1	Medium	Low	Low	Low
Low	>1	Low	Low	Low	Low

Table B.3: Sensitivity of the Area to Dust Soiling Effects of People and Property

Receptor Sensitivity	Annual Mean PM ₁₀ Concentration	Number of Receptors	Distance from the source (m)				
			<20	<50	<100	<200	<250
High	>32 µg/m ³	>100	High	High	High	Medium	Low
		10-100	High	High	Medium	Low	Low
		1-10	High	Medium	Low	Low	Low
	28-32 µg/m ³	>100	High	High	Medium	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	High	Medium	Low	Low	Low
	24-28 µg/m ³	>100	High	Medium	Low	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	<24 µg/m ³	>100	Medium	Low	Low	Low	Low
		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Medium	>32 µg/m ³	>10	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	28-32 µg/m ³	>10	Medium	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	24-28 µg/m ³	>10	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	<24 µg/m ³	>10	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Low	-	>1	Low	Low	Low	Low	Low

Table B.4: Sensitivity of the Area to Human Health Impacts

Receptor Sensitivity	Distance from the source (m)	
	<20	<50
High	High	Medium
Medium	Medium	Low
Low	Low	Low

Table B.5: Sensitivity of the Area to Ecological Impacts

Receptor Sensitivity	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Medium Risk
Medium	High Risk	Medium Risk	Low Risk
Low	Medium Risk	Low Risk	Negligible

Table B.6: Demolition

Receptor Sensitivity	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible

Table B.7: Earthworks

Receptor Sensitivity	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible

Table B.8: Construction

Receptor Sensitivity	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible

Table B.9: Trackout

Appendix C: Construction Phase Mitigation Measures

- C.1 The pre-mitigation risk of dust soiling during demolition and construction is **Medium**, whilst during earthworks and trackout is **Low**.
- C.2 The pre-mitigation risk to human health during construction is **Medium**, whilst during demolition and earthworks is **Low** and during trackout is **Negligible**.
- C.3 The pre-mitigation risk to ecological receptors during construction is **Low**, whilst during demolition, earthworks and trackout is **Negligible**.
- C.4 The mitigation measures described below are suggested as measures that should be included in a site-specific Construction Environmental Management Plan (CEMP).
- C.5 Due to the site being considered **Medium risk** during demolition and construction and a **Low risk** during earthworks and trackout, the following mitigation measures are either D=Desirable, H=Highly Recommended or N=Not Required in **Table C.1** to **Table C.5** below.

Demolition:

Mitigation Measures	Low Risk	Medium Risk	High Risk
Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).	D	D	H
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.	H	H	H
Avoid explosive blasting, using appropriate manual or mechanical alternatives.	H	H	H
Bag and remove any biological debris or damp down such material before demolition.	H	H	H

Table C.1: Site Specific Mitigation Measures for Demolition Activities

Earthworks:

Mitigation Measures	Low Risk	Medium Risk	High Risk
Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.	N	D	H
Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable	N	D	H
Only remove the cover in small areas during work and not all at once	N	D	H

Table C.2: Site Specific Mitigation Measures for Earthwork Activities

Construction:

Mitigation Measures	Low Risk	Medium Risk	High Risk
Avoid scabbling (roughening of concrete surfaces) if possible	D	D	H
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.	D	H	H
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.	N	D	H
For smaller supplies of fine power materials ensure bags are sealed after use and stored appropriately to prevent dust.	N	D	D

Table C.3: Site Specific Mitigation Measures for Construction Activities

Trackout:

Mitigation Measures	Low Risk	Medium Risk	High Risk
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.	D	H	H
Avoid dry sweeping of large areas.	D	H	H

Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.	D	H	H
Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.	N	H	H
Record all inspections of haul routes and any subsequent action in a site log book.	D	H	H
Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.	N	H	H
Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).	D	H	H
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.	N	H	H
Access gates to be located at least 10 m from receptors where possible.	N	H	H

Table C.4: Site Specific Mitigation Measures for Trackout Activities

General Mitigation Measures:

Mitigation Measures	Low Risk	Medium Risk	High Risk
Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.	N	H	H
Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary.	H	H	H
Display the head or regional office contact information	H	H	H
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. In London additional measures may be required to ensure compliance with the Mayor of London's guidance. The DMP may include monitoring of dust deposition, dust flux, real time PM ₁₀ continuous monitoring and/or visual inspections.	D	H	H
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.	H	H	H
Make the complaints log available to the local authority when asked.	H	H	H
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.	H	H	H
Hold regular liaison meetings with other high risk construction sites within 500m of the site boundary, to ensure plans are co-ordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the off-site transport/deliveries which might be using the same strategic road network routes.	N	N	H
Monitoring			
9. 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 window sills within 100 m of site boundary, with cleaning to be provided if necessary.	D	D	H
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	H	H	H
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.	H	H	H
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.	N	H	H
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.	H	H	H
Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site.	H	H	H
Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period	D	H	H
Avoid site runoff of water or mud.	H	H	H
Keep site fencing, barriers and scaffolding clean using wet methods.	D	H	H
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.	D	H	H
Cover, seed or fence stockpiles to prevent wind whipping.	D	H	H
Operating Vehicle/Machinery and Sustainable Travel			
Ensure all on-road vehicles comply with the requirements of the London Low Emission Zone and the London NRMM standards, where applicable	H	H	H
Ensure all vehicles switch off engines when stationary - no idling vehicles.	H	H	H
Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable.	H	H	H
Impose and signpost a maximum-speed-limit of 15 mph on surfaced and 10 mph 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)	D	D	H
Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.	N	H	H
Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing)	N	D	H
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.	H	H	H

Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate.	H	H	H
Use enclosed chutes and conveyors and covered skips.	H	H	H
Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.	H	H	H
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.	D	H	H
Waste Management			
Avoid bonfires and burning of waste materials.	H	H	H

Table C.5: Site Specific Mitigation Measures for General Activities

