



1r10282

REPORT FOR

BASELINE AIR QUALITY ASSESSMENT

AT

TY CAMBRIA, CARDIFF

PREPARED FOR

ELITE CASK LIMITED

PREPARED BY

**LEWIS ELLISON
PLANNING AND ENVIRONMENTAL CONSULTANTS**

Date

05TH AUGUST 2026

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1 INTRODUCTION

1.1 BACKGROUND

Planning and Environmental Consultants (PEC) Ltd have been commissioned by Elite Cask Limited, hereafter referred to as “the Client” to undertake a Baseline Air Quality Assessment in support of a planning application for a proposed mixed use development at Ty Cambria, Newport Road, Cardiff, herein after referred to as the “Proposed Development”.

1.2 SITE LOCATION AND CONTEXT

The application site is located at Ty Cambria, Newport Road, Cardiff at approximate National Grid Reference (NGR) 319050, 176830. Reference should be made to Figure 1 within Appendix A for a location plan.

PEC understand the proposed comprises the development of a 23-storey mixed use building with commercial floor space at ground level and student accommodation above. The site is located along Newport Road, Cardiff, which is considered to be a significant source of road vehicle exhaust emissions. The application site is also located 200 m west of the Cardiff County Council (CCC) Air Quality Management Area (AQMA) which has been declared due to exceedances of the annual mean Air Quality Objective (AQO) for nitrogen dioxide (NO₂). Subsequently, the Proposed Development has the potential to introduce future site users into an area of existing poor air quality.

This baseline Air Quality Assessment has been produced to inform a full air quality assessment at a later date when the relevant data is available. The assessment will be undertaken in accordance with the requirements of the National Planning Policy Framework (NPPF) and the CCC Local Planning Policy.

1.3 LIMITATIONS

This report has been produced in accordance with PEC Ltd standard terms of engagement. This report is solely for the use of the Client and those parties with whom a warranty agreement has been executed, or with whom an assignment has been agreed. Should any third party wish to use or rely upon the contents of the report, written approval must be sought from PEC Ltd at which point a charge may be levied against such approval.

2 LEGISLATION, GUIDANCE AND POLICY

The following legislation, guidance and policy will be considered and adhered to during the preparation of the Air Screening Quality Assessment:

- European Union (EU) Directive 2008/50/EC;
- European Union (EU) Directive 2008/50/EC;
- Planning Policy Wales, Edition 12, published February 2024
- Section 82 of the Environment Act (Part IV), updated 9th November 2021;
- The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, Department for Environment, Food and Rural Affairs (DEFRA), 2007¹;
- The Air Quality Standards (Amendment) Regulations (2016);
- Local Air Quality Management Technical Guidance 2022 LAQM.TG(22), DEFRA, August 2022²;
- Guidance on the Assessment of Dust from Demolition and Construction, Institute of Air Quality Management (IAQM), v2.2, 2024³;
- Land-Use Planning and Development Control: Planning for Air Quality, Environmental Protection UK (EPUK) and IAQM, January 2017⁴;
- Cardiff Local Development Plan 2006-2026, published January 2016

2.1 UK LEGISLATION AND GUIDANCE

The Air Quality Standards (Amendment) Regulations (2016) came into force on 31st December 2016. These Regulations amend the Air Quality Standards Regulations 2010 and transpose the EU Directive 2008/50/EC into UK law. Air Quality Limit Values (AQLVs) were published in these regulations for 7 pollutants, as well as Target Values for an additional 6 pollutants.

Part IV of the Environment Act (2021) requires UK government to produce a national Air Quality Strategy (AQS) which contains standards, objectives and measures for improving ambient air quality. The most recent AQS was produced by the Department for Environment, Food and Rural Affairs (DEFRA) and published in July 2007¹. The AQS sets out Air Quality Objectives (AQOs) that are maximum ambient pollutant concentrations that are not to be exceeded either without exception or with a permitted number of exceedances over a specified timescale. These are generally in line with the AQLVs, although the requirements for compliance vary slightly.

Table 1 presents the AQOs for pollutants considered within this assessment.

Table 1: Air Quality Objectives

Pollutant	Air Quality Objectives	
	Concentration ($\mu\text{g}/\text{m}^3$)	Averaging Periods
NO ₂	40	Annual mean
	200	1-hour mean; not to be exceeded more than 18 times a year
PM ₁₀	40	Annual mean
	50	24-hour mean; not to be exceeded more than 35 times a year
PM _{2.5}	25	Annual mean

Table 2 summarises the advice provided in DEFRA guidance LAQM.TG(16)² on where the AQOs for pollutants considered within this report apply.

1 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, DEFRA, 2007

2 Local Air Quality Management Technical Guidance 2022 LAQM.TG(22), DEFRA, 2022

3 Guidance on the Assessment of Dust from Demolition and Construction, Institute of Air Quality Management, 2016

4 Land-Use Planning and Development Control: Planning for Air Quality, EPUK and IAQM, 2017

Table 2: Examples of Where the Air Quality Objectives Apply

Averaging Periods	Objectives Should Apply At	Objectives Should Not Apply At
Annual mean	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 mean	All locations where the annual mean objective would apply, together with hotels. 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 mean	All locations where the annual mean and 24-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 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 be expected to spend one hour or longer	Kerbside sites where the public would not be expected to have regular access

The monitoring results provided by CCC and background concentrations provided by DEFRA will be compared against the relevant AQOs detailed in Table 1 to determine onsite exposure.

2.2 LOCAL PLANNING POLICY

The CCC local development plan was published in January 2016 and provides guidance and policy on development and construction within the local administration between 2006-2026. A review of the plan provides the following policies in relation to air quality:

- Policy KP18: Natural Resources

In the interests of the long-term sustainable development of Cardiff, development proposals must take full account of the need to minimise impacts on the city's natural resources and minimise pollution, in particular the following elements:

iii. Minimising air pollution from industrial, domestic and road transportation sources and managing air quality.

- Policy EN13: Air, Noise, Light Pollution and Land Contamination

Development will not be permitted where it would cause or result in unacceptable harm to health, local amenity, the character and quality of the countryside, or interests of nature conservation, landscape or built heritage importance because of air, noise, light pollution or the presence of unacceptable levels of land contamination.

Reference has been made to these policies during the undertaking of this baseline Air Quality Assessment. A replacement Local Development Plan is also in production but is not available at the time of writing.

3 METHODOLOGY

There is the potential for the Proposed Development to expose future site users to elevated NO₂, PM₁₀ and PM_{2.5} concentrations, as well as to cause impacts at sensitive locations during the construction and operational phases. These will be assessed in accordance with the following methodology within the final Air Quality Assessment.

3.1 CONSTRUCTION PHASE ASSESSMENT

There is the potential for fugitive dust emissions to occur as a result of construction phase activities. These have been assessed in accordance with the methodology outlined within the IAQM document 'Guidance on the Assessment of Dust from Demolition and Construction'³.

Reference should be made to Appendix B for details of the relevant IAQM construction phase assessment criteria, which were utilised in conjunction with site specific information

Activities on the proposed construction site have been divided into four types to reflect their different potential impacts. These are:

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

The potential for dust emissions was assessed for each activity that is likely to take place and considered three separate dust effects:

- Annoyance due to dust soiling;
- Harm to ecological receptors; and
- The risk of health effects due to a significant increase in exposure to PM₁₀ and PM_{2.5}

A desk top survey will be undertaken to identify human and ecological receptors within the relevant assessment buffers specified by the IAQM guidance³. Should sensitive receptors not be present within the relevant distances then negligible impacts would be expected and further assessment is not necessary.

Following the identification of sensitive receptors, a site is then allocated a risk category which is assigned to each activity, based on the scale and nature of the works, as well as the sensitivity of the area to dust impacts.

The assigned magnitude and sensitivity will then determine the overall risk and appropriate mitigation measures to be employed during construction phase activities.

The IAQM guidance³ is provided in Appendix B, with the details of the assessor's qualifications and experience. provided in Appendix C.

3.2 OPERATIONAL PHASE ASSESSMENT

3.2.1. FUTURE EXPOSURE

The Proposed Development is located within close proximity to one of CCCs AQMAs. Subsequently, the proposals have potential to introduce new receptors into an area of elevated NO₂, PM₁₀ and PM_{2.5}. Detailed dispersion modelling was therefore undertaken to quantify NO₂, PM₁₀ and PM_{2.5} pollutant exposure across the site and determine suitability for the proposed use. The following modelling scenarios were utilised during the assessment:

- 2024 as baseline year for verification against latest ratified data;
- Opening year do-something (DS) (predicted traffic flows in the proposed opening year should the proposals be completed)

In light of expected emission improvements to the national vehicle fleet guided by government policy, it would be unrealistic not to assume a reduction to vehicle emission factors in future years.

The results of the dispersion modelling assessment will also be compared against the relevant AQOs detailed in Table 1 to determine significance. Full details of data used for the modelling assessment will be provided

3.2.2. ROAD VEHICLE EXHAUST IMPACT ASSESSMENT

Based on the details of the Proposed Development and anticipated trip generation a screening assessment in accordance with the EPUK and IAQM guidance⁴ was determined a suitable assessment approach. The assessment will determine road traffic exhaust and combustion emission impacts associated with the Proposed Development, and confirm the requirement for detailed assessment work.

The EPUK and IAQM document states the following criteria to help establish when an air quality assessment is likely to be considered necessary:

- Proposals that will cause a change in Light Duty Vehicle (LDV) flows of more than 100 Annual Average Daily Traffic (AADT) within or adjacent to an AQMA or more than 500 elsewhere;
- Proposals that will cause a change in Heavy Duty Vehicle (HDV) flows of more than 25 AADT within or adjacent to an AQMA or more than 100 elsewhere;
- Proposals which include either a centralised plant using biofuel, a combustion plant with single or thermal input >300KWh or a standby emergency generator associated with a centralised energy centre; and
- Proposals which include combustion processes of any size.

Should the above criteria not be met, the EPUK and IAQM document considers air quality impacts associated with the scheme to be not significant and no further assessment is required. Conversely, should the criterion be exceeded it may be deemed necessary that further assessment is required.

4 BASELINE

Existing air quality conditions in the vicinity of the application site were identified in order to provide a baseline for assessment. These are detailed in the following sections.

4.1 LOCAL AIR QUALITY MANAGEMENT

As required by the Environment Act (2021), CCC, has undertaken review and assessment of air quality within their area of administration. This process has indicated that annual mean concentrations of NO₂ are above the AQO within their administration. As such, 4 AQMAs have been declared, the closest being described as:

- Stephenson Court AQMA - From NE and NW boundaries of Stephenson Court, NW boundary of Burgess Court, NW and SW boundaries of Four Elms Court, SW corner of Four Elms Court south across Newport road to the junction with Orbit St, West across Newport Rd to the SE corner of Stephenson Court.

The application site is located 190m west of the AQMA. As such there is potential for the Proposed Development to introduce future site users into an area of elevated annual mean NO₂ concentrations, and to cause air quality impacts within this sensitive area during the construction and operational phases. This has been considered within this report.

CCC has concluded that concentrations of all other pollutants considered within the AQS are currently below the relevant AQOs and as such no further AQMAs have been designated.

4.2 AIR QUALITY MONITORING

Monitoring of pollutant concentrations is undertaken by CCC using continuous and passive methods throughout their areas of administration. A review of CCC's most recent Air Quality Monitoring Data indicated that there are currently 2 indicative automatic analysers operated by CCC within the vicinity of the Proposed Development. Recent monitoring results from this location are shown in Table 3.

Table 3: Indicative Automatic Monitoring Results

ID	Site Name	Type	NGR (m)		Distance to Site (m)	Pollutant	Annual Mean Concentration (µg/m ³)		
			X	Y			2022	2023	2024
SN-0131	Newport Road	Roadside	319410	176988		NO ₂	N/A	N/A	11
						PM ₁₀	N/A	N/A	10
						PM _{2.5}	N/A	N/A	3
SN-0634	Newport Road	Roadside	319293	176923		NO ₂	N/A	N/A	14
						PM ₁₀	N/A	N/A	N/A
						PM _{2.5}	N/A	N/A	N/A

As indicated in Table 3, there were no exceedances of annual mean AQOs for NO₂, PM₁₀ or PM_{2.5} at the monitoring locations in recent years.

Cardiff Council also monitor annual mean NO₂ concentrations across the borough using passive diffusion tubes. A review of the most recent air quality monitoring data indicated 9 diffusion tubes located within the vicinity of the application site, presented in Table 4.

Table 4: NO₂ Diffusion Tube Monitoring Results

ID	Site Name	Type	NGR (m)		Dist' to Site (m)	Annual Mean Concentration (µg/m ³)		
			X	Y		2022	2023	2024
81	Stephenson Court	Roadside	319387	176980	361	27	24.5	22.2
131	Dragon Court	Roadside	319292	176932	254	26	24.8	24.6
183	Station Terrace	Kerbside	318765	176623	358	25.9	22.2	21.8
190	3 Pearson Street	Roadside	319056	177343	316	28.3	26.3	22.3
198	Next Building to Stephenson Court	Roadside	319348	176958	641	20.1	19	17.9
199	157 Newport Road	Roadside	319599	177174	195	31.3	28	24.3
220	Fitzalan Court Newport Road	Kerbside	318955	176689	518	21.1	19.8	20.6
TRO-024	Glossops Road	Kerbside	319283	176827	222	32.4	26.2	18.9
TRO-027	Wordsworth Avenue	Kerbside	319327	177080	368	18.5	15.6	17.1

As indicated in Table 4, there were no predicted exceedances of the AQO in recent years at the nearby monitoring locations.

Reference should be made to Figure 2 within Appendix A for a graphical representation of the monitoring locations.

4.3 BACKGROUND POLLUTANT CONCENTRATIONS

The total concentration of a pollutant is comprised of explicit local emission sources (such as roads and industrial sources) and the background component. The background component consists of indeterminate sources which are transported into an area from further away by meteorological conditions. Background pollutant concentrations are therefore the ambient level of pollution that is not affected by local sources of pollution.

In reality, it is not usually practical to obtain a true representation of background levels in urban areas due to corruption by local sources; background levels used in assessments may contain a mixture of both sources.

Predictions of background pollutant concentrations on a 1km by 1km grid basis have been produced by DEFRA for the entire of the UK to assist LAs in their Review and Assessment of air quality. The Proposed Development site is located across grid square:

- NGR: 319500, 176500

Data for this location was downloaded from the DEFRA website. For this assessment, background concentrations are summarised in Table 5 for the current base year (2024).

Table 5: Predicted Background Pollutant Concentrations

Pollutant	Predicted Background Concentration (µg/m ³)
	2024
NO _x	22.16
NO ₂	16.07
PM ₁₀	14.39

Pollutant	Predicted Background Concentration ($\mu\text{g}/\text{m}^3$)
	2024
PM _{2.5}	9.00

As indicated in Table 5, background pollutant concentrations of NO₂, PM₁₀ and PM_{2.5} are below the relevant AQOs detailed in Table 1.

4.4 SENSITIVE RECEPTORS

A sensitive receptor is defined as any location which may be affected by changes in air quality as a result of a development. These have been defined for construction dust impacts in the following Sections.

4.4.1. CONSTRUCTION PHASE SENSITIVE RECEPTORS

There are no nationally or European designated ecological receptors within 50m of the Site boundary, or within 50m from a route used by construction vehicles on the public highway (up to 500m from the Site entrance). Therefore, the risk of dust effects at a nationally or European designated ecological receptor site from construction impacts have not been considered further in this assessment.

Human receptors sensitive to potential dust impacts during, demolition, earthworks and construction were identified from a desk-top study of the area up to 250m from the Proposed Development boundary. These are summarised in Table 6.

Table 6: Demolition, Earthworks and Construction Dust Sensitive Receptors

Distance from Site Boundary (m)	Approximate Number of Human Receptors
Less than 20	More than 100
20 – 50	More than 100
50 – 100	More than 100
100 – 250	More than 100

Reference should be made to Figure 3 within Appendix A for a graphical representation of demolition, earthworks, and construction dust buffer zones.

Receptors sensitive to potential dust impacts from trackout were identified from a desk-top study of the area up to 50m from the road network within 250m of the site access route. These are summarised in Table 7. The exact construction vehicle access routes were not available for the purpose of this assessment as they will depend on sourcing of materials. This is likely to be decided by the contractor. However, it was assumed that construction traffic would access the Proposed Development via Newport road, to ensure a worst case trackout assessment is undertaken.

Table 7: Trackout Dust Sensitive Receptors

Distance from Site Boundary (m)	Approximate Number of Human Receptors
Less than 20	More than 100
20 – 50	More than 100

Reference should be made to Figure 4 within Appendix A for a graphical representation of trackout dust buffer zones.

A number of additional factors have been considered when determining the sensitivity of the surrounding area. These are summarised in Table 8.

Table 8: Additional Area Sensitivity Factors

Guidance	Comment
Whether there is any history of dust generating activities in the area	The site is located in a mixed use urban area. There is likely to have been a history of dust generating activities due to redevelopment processes in the locality.
The likelihood of concurrent dust generating activity on nearby sites.	A review of the CCC Planning Portal indicated that there are several planning applications within 500m of the Proposed Development. As such, there is potential for concurrent dust generation should the construction phases of the aforementioned developments overlap.
Pre-existing screening between the source and the receptors	There is no dense vegetation present along the development boundaries. Hence, there is no level of natural protective screening in any directions.
Conclusions drawn from analysing local meteorological data which accurately represent the area: and if relevant the season during which works will take place	The wind direction is predominantly from the west of the development. As such, properties to the east of the site would be most affected by dust emissions
Conclusions drawn from local topography	The topography of the area appears to be predominantly flat. As such, there are no constraints to dust dispersion.
Duration of the potential impact, as a receptor may become more sensitive over time	Currently the duration of the construction phase is unknown.
Any known specific receptor sensitivities which go beyond the classifications given in the document.	No specific receptor sensitivities identified during the baseline.

4.4.2. OPERATIONAL PHASE SENSITIVE RECEPTORS

A desk top study was undertaken to identify the closest receptor locations to the application site. This indicated residential locations within close proximity to all development boundaries. There are educational and medical facility in immediate vicinity of the application site or the affected road networks, with the nearest education facility (Cardiff Sixth Form College) located adjacent to the site and medical facility (Cardiff Royal Infirmary) located approximately 200m east of the site.

5 FURTHER ASSESSMENT

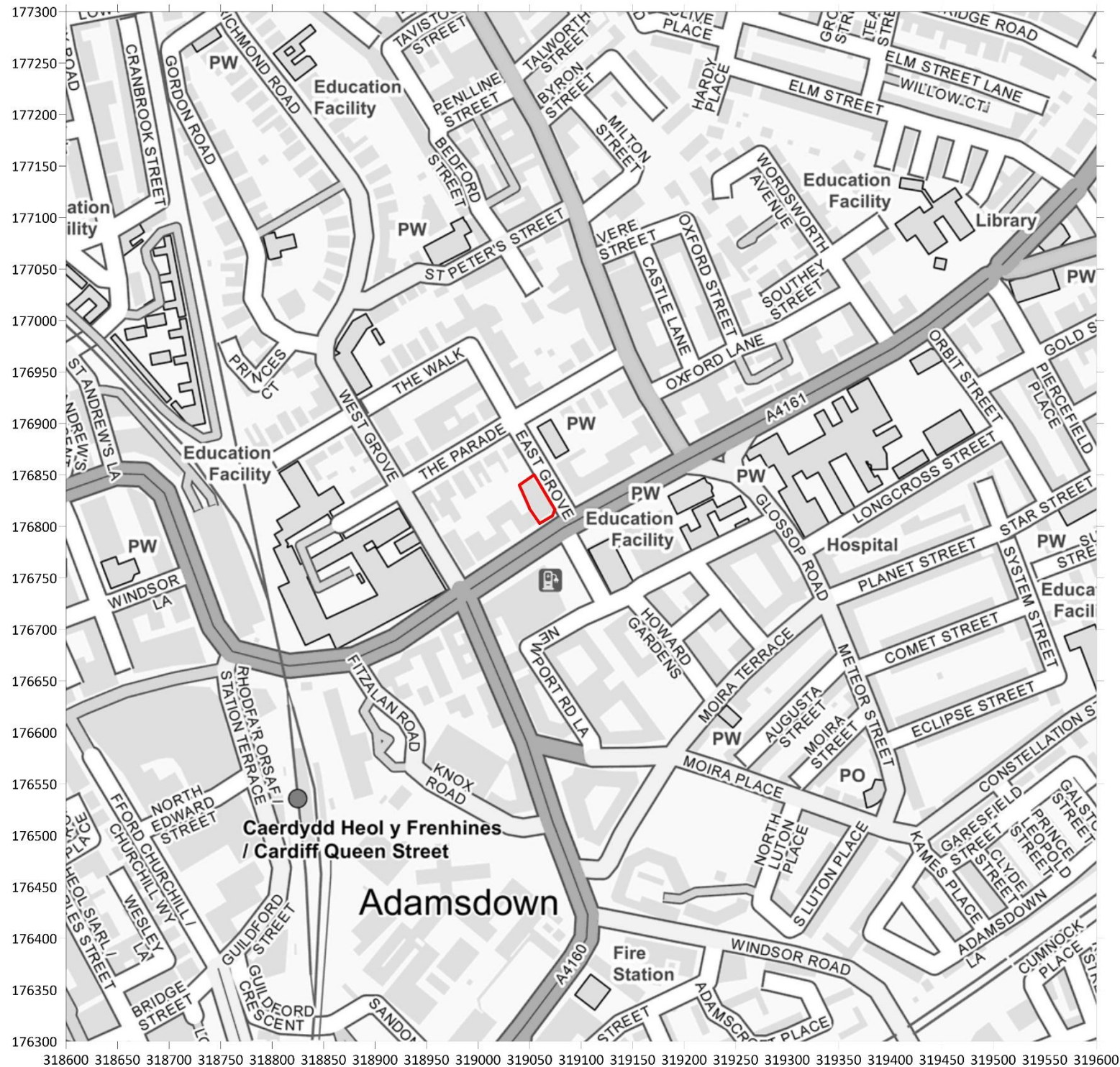
A full air quality assessment should be undertaken using the baseline information contained within this report once the relevant information has been acquired including:

- Traffic counts in AADT for the local road network
- Meteorological data for the baseline year
- Confirmation of methodology by CCC
- Anticipated development opening year
- Anticipated construction period
- Anticipated construction processes
- Anticipated trackout route

APPENDIX 1 – ABBREVIATIONS

AADT	Annual Average Daily Traffic
ADM	Atmospheric Dispersion Modelling
AQLV	Air Quality Limit Value
AQMA	Air Quality Management Area
AQO	Air Quality Objectives
AQS	Air Quality Strategy
ASR	Air Quality Status Report
CCC	Cardiff County Council
DEFRA	Department for Environment, Food and Rural Affairs
DMP	Dust Management Plan
EPUK	Environmental Protection UK
EU	European Union
HDV	Heavy Duty Vehicle
IAQM	Institute of Air Quality Management
LAQM	Local Air Quality Management
LA	Local Authority
LDV	Light Duty Vehicle
NGR	National Grid Reference
NO ₂	Nitrogen dioxide
NO _x	Oxides of nitrogen
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
PM _{2.5}	Particulate matter with an aerodynamic diameter of less than 2.5µm
PM ₁₀	Particulate matter with an aerodynamic diameter of less than 10µm

APPENDIX 2 - FIGURES



Legend

Site Boundary

Title
Figure 1
Site Location

Project
Ty Cambria, Cardiff

Project Number
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Consultants Ltd

First floor,
3 Stone Cross Lane North
Lowton, Warrington, WA3 2SA
www.pec ltd.org
info@pec ltd.org
01942 365472





- Site Boundary
- Diffusion Tube Monitoring Locations
- Indicative Automatic Analyser Monitoring Location

Figure 2
Diffusion Tube Monitoring Locations

Ty Cambria, Cardiff

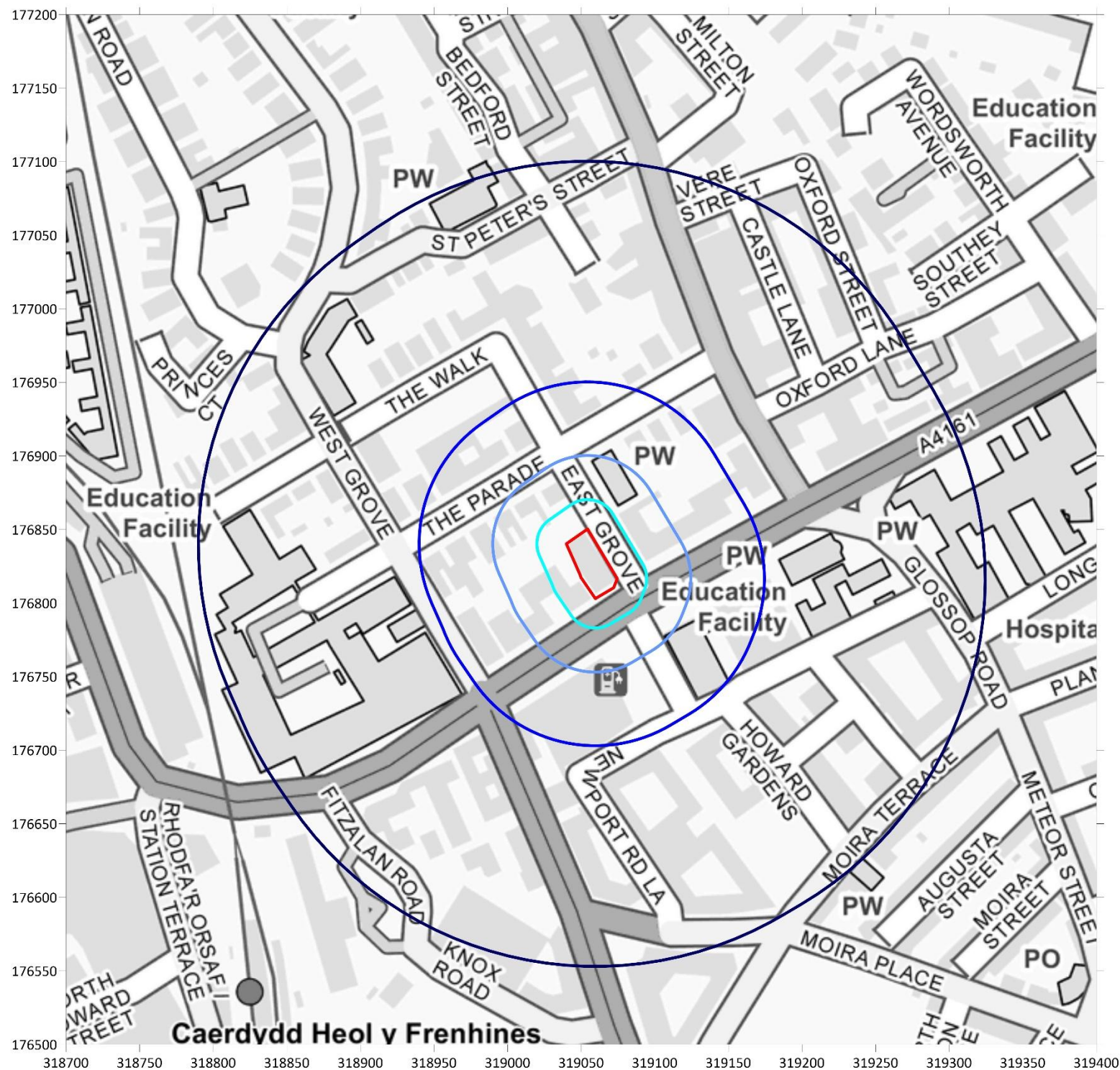
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Planning and Environmental
Consultants Ltd

First floor,
3 Stone Cross Lane North
Lowton, Warrington, WA3 2SA
www.pecitd.org
info@pecitd.org
01942 365472





- Legend**
- Site Boundary
 - 20m from Site Boundary
 - 50m from Site Boundary
 - 100m from Site Boundary
 - 350m from Site Boundary

Title
Figure 3
Demolition, Earthworks and Construction
Dust Buffer Zones

Project
Ty Cambria, Cardiff

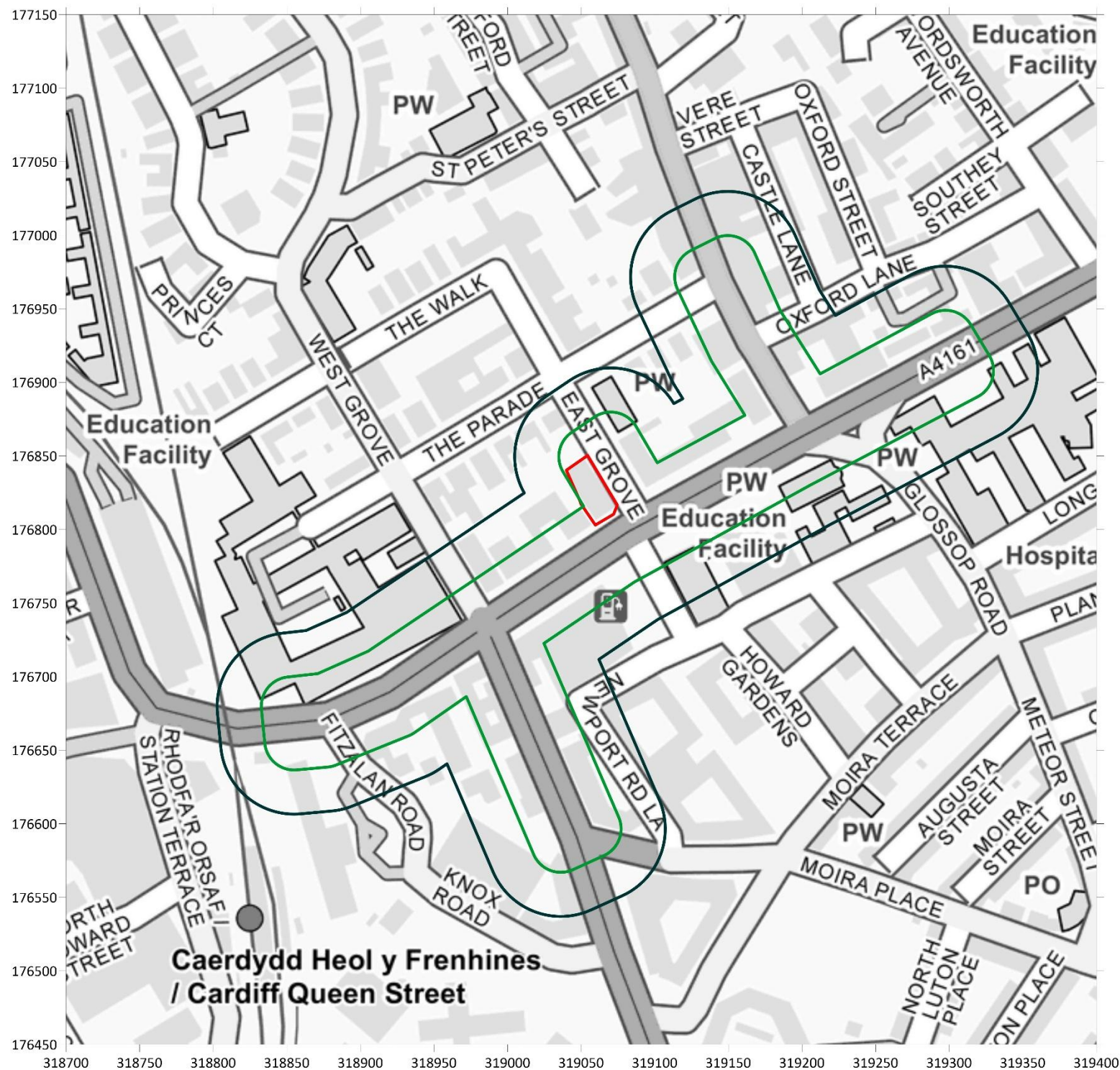
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First floor,
3 Stone Cross Lane North
Lowton, Warrington, WA3 2SA
www.pec ltd.org
info@pec ltd.org
01942 365472





Legend

-  Site Boundary
-  20m from Site Access Route
-  50m from Site Access Route

Title

Figure 4

Trackout Dust Buffer Zones

Project

Ty Cambria, Cardiff

Project Number

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First floor,
3 Stone Cross Lane North
Lowton, Warrington, WA3 2SA
www.pec ltd.org
info@pec ltd.org
01942 365472



APPENDIX 4 – ASSESSORS CV

Lewis Ellison Technical Director MOcean, MIEEnvSc, MIAQM
KEY EXPERIENCE Lewis is a Technical Director with specialist experience in the air quality sectors. His key capabilities include: • Production of Air Quality Assessments to the Department for Environment, Food and Rural Affairs (DEFRA), Environment Agency and Environmental Protection UK (EPUK) methodologies for clients from the residential, retail and commercial sectors. • Detailed dispersion modelling of road vehicle emissions using ADMS-Roads. Studies have included impact assessment of pollutant concentrations at various floor levels and assessment of suitability of development sites for proposed end-use. • Assessment of dust impacts from construction sites to the Institute of Air Quality Management (IAQM) methodology. • Assessment of Odour Impact from commercial and industrial processes in line with Environment Agency (EA) and IAQM methodologies and guidance • Quantification of Ecological Impacts associated with Nitrogen and Acid Deposition from industrial processes • Production of air quality mitigation strategies for developments throughout the UK.
SELECT PROJECTS SUMMARY Permit Application Support • Elliot Hire Salford • Elliot Hire Wakefield • Elliot Hire Scunthorpe ES Chapters • Lyle Park West, Newham – residential development in close proximity to an active industrial estate. • Deansgate, Manchester – residential multistorey development in the centre of Manchester. • Land West of Stevenage – 1350 residential unit development with the potential to negatively impact local air quality Air Quality • Goulton Street Hull – Outline planning permission for 7 industrial units within Hull • Empire Cinema, Birmingham – Diffusion tube survey and air quality assessment for an assisted living accommodation • Tirrell's Lane, Tenbury Wells – residential assessment in the village of Tenbury Wells. Odour Assessments • Gowanbank, Forfar – Odour survey to support a residential development in close proximity to Gowanbank recycling centre • Squires Close, Pocklington – Odour risk assessment in support of a residential in close proximity to a sewage treatment works • Hawthorn Fields, Rufforth - Odour risk assessment in support of a residential in close proximity to a waste water treatment works Dust Assessment • Liverpool Docks – Construction dust monitoring survey • Lyle Park West – Dust impact assessment from adjacent concrete batching plant • High Street, Burton – Construction dust risk assessment London Experience • Gurnell Leisure Centre – mixed use development including residential, sports and commercial land use • Springfield Village Wandsworth – residential development and extension to the existing hospital building • Evelyn House, Greenwich – residential apartment block Monitoring & Surveying Experience • Liverpool Waters – Frisbee Dust gauge monitoring • Gownbank, Forfar – Field odour survey “sniff test” • Empire Cinema Birmingham – Diffusion tube survey
QUALIFICATIONS • Masters of Geological Oceanography • Odour Acuity Certified Master of Science