



**ENVIRONMENTAL STATEMENT**  
**VOLUME 2**  
**APPENDIX 7.5 – OPERATIONAL PHASE**  
**ASSESSMENT**



## Appendix 7.5 – Operational Phase Assessment.

### Road Traffic Emissions

Additional traffic generated by the operation of the Proposed Development will generate additional vehicle emissions. An assessment was therefore undertaken using air quality dispersion modelling techniques (ADMS ROADS) in order to quantify potential changes in pollutant concentrations at sensitive locations in the vicinity of the site.

The following scenarios have been modelled:

- 2018 Verification Year;
- 2022 Do Minimum (DM);
- 2022 Do Something (DS);

The DM (i.e. without development) scenario is representative of anticipated traffic data for 2022 including committed development. The DS (i.e. with development) scenario is representative of anticipated traffic data for 2022 including committed development, with the addition of predicted variations in traffic flow patterns as a result of the Proposed Development.

There remains some uncertainty regarding future NO<sub>x</sub> emissions from diesel vehicles and to take this into account, emission factors from 2018 have been used within the future year scenarios. This assumes no improvement in emissions in the future and therefore presents a worse case scenario.

In order to determine the significance of the predicted impacts, the approach suggested by the EPUK/IAQM guidance<sup>i</sup>, has been used for existing sensitive receptor locations where the annual mean objective applies i.e. residential properties. The EPUK/IAQM approach provides a method for identifying the impact descriptor for each receptor based on the change in pollutant concentrations between the DM and DS scenario and the pollutant concentration predicted during the DS scenario, expressed as a percentage of the AQO.

To determine the overall significance of the effects of a Proposed Development, professional judgement is also required. A number of factors are considered including the air quality with and without the proposed development, the extent of current and future exposure, the assumptions adopted in the prediction of the impacts as well as the impact descriptors for the individual receptors. Where a single development can be judged in isolation, it is likely that a 'substantial' (**major**) or 'moderate' (**moderate**) impact will give rise to a significant effect and a 'slight' (**minor**) or 'negligible' (**negligible**) impact will not have a significant effect.

Table A5-1 has been replicated from the EPUK/IAQM guidance<sup>i</sup> and provides detail on the impact descriptors used to determine effects at existing sensitive receptors in the vicinity of the Site.

**Table A5-1: EPUK/IAQM Impact Descriptors for Individual Receptors**

Long Term Average Concentration at Receptor Location	% Change in Concentration relative to Air Quality Assessment Level (AQAL)			
	1	2-5	6-10	>10
75% or less of AQAL	Negligible	Negligible	Slight	Moderate
76-94% of AQAL	Negligible	Slight	Moderate	Moderate
95-102% of AQAL	Slight	Moderate	Moderate	Substantial
103-109% of AQAL	Moderate	Moderate	Substantial	Substantial
110% or more of AQAL	Moderate	Substantial	Substantial	Substantial

## Predicted NO<sub>2</sub> Concentrations

Annual mean NO<sub>2</sub> concentrations were predicted for 2022 and are summarised in Table A5-2.

**Table A5-2: Predicted Annual Mean Concentrations of NO<sub>2</sub> in 2022 at Existing Sensitive Receptors**

Sensitive Receptor		Predicted Annual Mean NO <sub>2</sub> Concentration (µg/m <sup>3</sup> )		
		DM	DS	Change
R1	Residential – A4095	22.3	22.8	0.5
R2	Residential – A4095	25.3	26.1	0.8
R3	Residential – A4095	29.5	30.7	1.2
R4	Residential – A4095	33.1	34.5	1.4
R5	Residential – A4095	25.6	26.4	0.7
R6	Residential – Unnamed Road	23.3	23.7	0.4
R7	Residential – A4095	21.1	21.6	0.5
R8	Residential – A4095	25.1	26.1	1.0
R9	Residential – Church Lane	39.2	39.6	0.4
R10	Residential – Caravan Park	35.6	36.0	0.4
R11	Hotel – Premier Inn Bicester	25.1	25.2	0.1
R12	Residential – A4095	21.5	21.9	0.4
R13	Residential – A4095	35.3	36.9	1.6
R14	Residential – A4095	25.0	25.8	0.8
R15	Residential – Unnamed Road	20.5	20.5	0.0
R16	Residential – Unnamed Road	22.4	22.5	0.1
R17	Residential – A4095	30.5	31.8	1.3
R18	Residential – A4095	31.2	32.5	1.3
R19	Residential – A4095	31.5	32.9	1.4
R20	Residential – A4095	26.4	27.3	0.9
R21	Residential – A4095	24.3	24.9	0.6
R22	Residential – A4095	29.3	30.4	1.1
R23	Residential – Unnamed Road	22.5	22.8	0.3
R24	Bicester Hotel, Golf and Spa	24.0	24.1	0.1
R25	Bicester Hotel, Golf and Spa Grounds	37.6	37.6	0.0
R26	Bicester Hotel, Golf and Spa Grounds	68.2	68.3	0.1
R27	Bicester Hotel, Golf and Spa Grounds	53.0	53.1	0.1
R28	Bicester Hotel, Golf and Spa Grounds	61.4	61.5	0.1
R29	Residential – Bicester Park Homes	39.3	39.8	0.5
R30	Residential – Haydock Road	22.5	22.6	0.1

As indicated in Table A5-2, predicted annual mean NO<sub>2</sub> concentrations were below the annual mean objective of 40µg/m<sup>3</sup> in both the DM and DS scenario for 2022 at the 24 sensitive

receptor locations considered in this assessment where the annual mean objective applies i.e. existing residential properties.

The remaining 6 receptor locations comprise the existing Premier Inn Hotel in Bicester and locations representative of the Bicester Hotel, Golf and Spa resort and its grounds. In line with LAQM.TG(16)<sup>ii</sup>, these locations where public exposure is expected to be short term i.e. a hotel or a golf course are comparable to the 1-hour mean for short term exposure.

The methodology within LAQM.TG(16)<sup>ii</sup> states that:

*“[...] exceedances of the 1-hour mean are unlikely to occur where the annual mean is below 60µg/m<sup>3</sup>.”*

The maximum annual NO<sub>2</sub> concentration predicted at receptors representative of Bicester Hotel, Golf and Spa grounds in the DS scenario is 68.7µg/m<sup>3</sup>. This is above the indicative criteria of 60µg/m<sup>3</sup>, however NO<sub>2</sub> concentrations in the DM scenario were also predicted to be 60.7µg/m<sup>3</sup>. Therefore, traffic associated with the Proposed Development does not lead to an exceedance of the hourly mean for NO<sub>2</sub>.

Predicted impacts on annual mean NO<sub>2</sub> concentrations, in line with the EPUK/IAQM guidance<sup>i</sup>, at the 25 sensitive receptor locations where the annual mean objectives apply are summarised in Table A5-3.

**Table A5-3: Predicted NO<sub>2</sub> Impacts**

Sensitive Receptor		% Change in Concentration Relative to AQO	Long Term Average Concentration	Magnitude of Impact
R1	Residential – A4095	1.3	75% or Less	Negligible
R2	Residential – A4095	2.0	75% or Less	Negligible
R3	Residential – A4095	2.9	76 – 94%	Slight
R4	Residential – A4095	3.5	76 – 94%	Slight
R5	Residential – A4095	2.0	75% or Less	Negligible
R6	Residential – Unnamed Road	1.1	75% or Less	Negligible
R7	Residential – A4095	1.2	75% or Less	Negligible
R8	Residential – A4095	2.4	75% or Less	Negligible
R9	Residential – Church Lane	0.8	95 – 102%	Slight
R10	Residential – Caravan Park	1.1	76 – 94%	Negligible
R12	Residential – A4095	1.1	75% or Less	Negligible
R13	Residential – A4095	4.1	76 – 94%	Slight
R14	Residential – A4095	1.8	75% or Less	Negligible
R15	Residential – Unnamed Road	0.2	75% or Less	Negligible
R16	Residential – Unnamed Road	0.4	75% or Less	Negligible
R17	Residential – A4095	3.2	76 – 94%	Slight
R18	Residential – A4095	3.3	76 – 94%	Slight
R19	Residential – A4095	3.3	76 – 94%	Slight
R20	Residential – A4095	2.2	75% or Less	Negligible
R21	Residential – A4095	1.5	75% or Less	Negligible

R22	Residential – A4095	2.8	75% or Less	Slight
R23	Residential – Unnamed Road	0.8	75% or Less	Negligible
R29	Residential – Bicester Park Homes	1.1	95 – 102%	Slight
R30	Residential – Haydock Road	0.2	75% or Less	Negligible

As indicated in Table A5-3, the magnitude of impacts on annual mean NO<sub>2</sub> concentrations at existing residential properties as a result of the Proposed Development was predicted to be negligible at 15 receptor locations and slight at the remaining 9 receptor locations.

Seven of the nine receptor locations where slight impacts are predicted are located along the A4095 through the village of Chesterton. For receptors R11 and R29, slight impacts are also predicted. Where slight impacts are predicted, it should be noted that annual mean NO<sub>2</sub> concentrations remain below the air quality objective of 40µg/m<sup>3</sup> with the Proposed Development in place.

The overall significance of operational phase road traffic emission impacts on annual mean NO<sub>2</sub> was determined to be significant in line with the EPUK/IAQM guidance<sup>i</sup>.

#### Particulate Matter – PM<sub>10</sub> and PM<sub>2.5</sub>

Annual mean PM<sub>10</sub> concentrations were predicted for the 2022 DM and DS scenarios and are summarised in Table A5-2.

**Table A5-3: Predicted Annual Mean PM<sub>10</sub> Concentrations**

Sensitive Receptor		Predicted Annual Mean PM <sub>10</sub> Concentration (µg/m <sup>3</sup> )		
		DM	DS	Change
R1	Residential – A4095	16.3	16.4	0.1
R2	Residential – A4095	16.7	16.9	0.2
R3	Residential – A4095	17.4	17.5	0.1
R4	Residential – A4095	17.9	18.1	0.2
R5	Residential – A4095	16.8	16.9	0.1
R6	Residential – Unnamed Road	16.4	16.5	0.1
R7	Residential – A4095	16.1	16.2	0.1
R8	Residential – A4095	18.2	18.4	0.2
R9	Residential – Church Lane	20.9	20.9	0.1
R10	Residential – Caravan Park	19.9	20.0	0.1
R11	Hotel – Premier Inn Bicester	18.5	18.5	0.0
R12	Residential – A4095	16.2	16.3	0.1
R13	Residential – A4095	18.3	18.6	0.3
R14	Residential – A4095	16.7	16.8	0.1
R15	Residential – Unnamed Road	16.0	16.0	0.0
R16	Residential – Unnamed Road	16.2	16.2	0.0
R17	Residential – A4095	17.5	17.7	0.2
R18	Residential – A4095	17.6	17.8	0.2
R19	Residential – A4095	17.7	17.9	0.2

Sensitive Receptor		Predicted Annual Mean PM <sub>10</sub> Concentration (µg/m <sup>3</sup> )		
		DM	DS	Change
R20	Residential – A4095	16.9	17.0	0.1
R21	Residential – A4095	16.6	16.7	0.1
R22	Residential – A4095	17.3	17.5	0.2
R23	Residential – Unnamed Road	16.2	16.3	0.1
R24	Bicester Hotel, Golf and Spa	16.4	16.4	0.0
R25	Bicester Hotel, Golf and Spa Grounds	19.7	19.7	0.0
R26	Bicester Hotel, Golf and Spa Grounds	24.3	24.3	0.0
R27	Bicester Hotel, Golf and Spa Grounds	21.8	21.8	0.0
R28	Bicester Hotel, Golf and Spa Grounds	23.2	23.2	0.0
R29	Residential – Bicester Park Homes	20.4	20.5	0.1
R30	Residential – Haydock Road	17.9	17.9	0.0

As indicated in Table A5-3, predicted annual mean PM<sub>10</sub> concentrations did not exceed the air quality objective of 40µg/m<sup>3</sup> at the 24 sensitive receptor locations where the annual mean objective applies.

The remaining 6 receptor locations comprise the existing Premier Inn Hotel in Bicester and locations representative of the Bicester Hotel, Golf and Spa resort and its grounds. In line with LAQM.TG(16)<sup>ii</sup>, these locations where public exposure is expected to be short term i.e. a hotel or a golf course are comparable to the 24-hour mean for short term exposure.

The methodology presented within LAQM.TG(16)<sup>ii</sup> to determine compliance with the 24-hour mean PM<sub>10</sub> objective, using the following relationship:

$$\text{No. 24-hour mean exceedances} = -18.5 + 0.00145 \times \text{annual mean}^3 + (206/\text{annual mean})$$

Based upon the maximum predicted annual mean PM<sub>10</sub> concentration of 24.3µg/m<sup>3</sup> modelled at receptor R24, this equates to 11 days where 24-hour mean PM<sub>10</sub> concentrations are greater than 50µg/m<sup>3</sup>. Thirty-five 24-hour periods where concentrations are in excess of 50µg/m<sup>3</sup> are permitted and therefore, the number of maximum exceedances is in compliance with the 24-hour mean AQO. Predicted impacts on annual mean PM<sub>10</sub> concentrations at the sensitive receptor locations where the annual mean objective applies are summarised in Table A5-4.

**Table A5-4: Predicted PM<sub>10</sub> Impacts**

Sensitive Receptor		% Change in Concentration Relative to AQO	Long Term Average Concentration	Magnitude of Impact
R1	Residential – A4095	0.2	75% or Less	Negligible
R2	Residential – A4095	0.3	75% or Less	Negligible
R3	Residential – A4095	0.4	75% or Less	Negligible
R4	Residential – A4095	0.6	75% or Less	Negligible
R5	Residential – A4095	0.3	75% or Less	Negligible
R6	Residential – Unnamed Road	0.2	75% or Less	Negligible
R7	Residential – A4095	0.2	75% or Less	Negligible

Sensitive Receptor		% Change in Concentration Relative to AQO	Long Term Average Concentration	Magnitude of Impact
R8	Residential – A4095	0.3	75% or Less	Negligible
R9	Residential – Church Lane	0.2	75% or Less	Negligible
R10	Residential – Caravan Park	0.2	75% or Less	Negligible
R12	Residential – A4095	0.2	75% or Less	Negligible
R13	Residential – A4095	0.7	75% or Less	Negligible
R14	Residential – A4095	0.3	75% or Less	Negligible
R15	Residential – Unnamed Road	0.0	75% or Less	Negligible
R16	Residential – Unnamed Road	0.1	75% or Less	Negligible
R17	Residential – A4095	0.5	75% or Less	Negligible
R18	Residential – A4095	0.5	75% or Less	Negligible
R19	Residential – A4095	0.5	75% or Less	Negligible
R20	Residential – A4095	0.3	75% or Less	Negligible
R21	Residential – A4095	0.2	75% or Less	Negligible
R22	Residential – A4095	0.4	75% or Less	Negligible
R23	Residential – Unnamed Road	0.1	75% or Less	Negligible
R29	Residential – Bicester Park Homes	0.2	75% or Less	Negligible
R30	Residential – Haydock Road	0.0	75% or Less	Negligible

As indicated in Table A5-4, the impacts on annual mean PM<sub>10</sub> concentrations as a result of the Proposed Development was predicted to be negligible at all sensitive receptor locations considered where the annual mean applies. As such, the overall significance of operational phase road traffic emission impacts on annual mean PM<sub>10</sub> was determined to be not significant in line with the EPUK/IAQM guidance<sup>1</sup>.

Annual mean PM<sub>2.5</sub> concentrations were predicted for the 2022 DM and DS scenarios and are summarised in Table A5-5.

**Table A5-5: Predicted Annual Mean PM<sub>2.5</sub> Concentrations**

Sensitive Receptor		Predicted Annual Mean PM <sub>10</sub> Concentration (µg/m <sup>3</sup> )		
		DM	DS	Change
R1	Residential – A4095	10.5	10.5	0.0
R2	Residential – A4095	10.8	10.8	0.0
R3	Residential – A4095	11.2	11.3	0.1
R4	Residential – A4095	11.5	11.6	0.1
R5	Residential – A4095	10.8	10.9	0.1
R6	Residential – Unnamed Road	10.5	10.6	0.1
R7	Residential – A4095	10.4	10.4	0.0
R8	Residential – A4095	11.2	11.3	0.1
R9	Residential – Church Lane	12.9	13.0	0.1



Sensitive Receptor		Predicted Annual Mean PM <sub>10</sub> Concentration (µg/m <sup>3</sup> )		
		DM	DS	Change
R10	Residential – Caravan Park	12.2	12.2	0.0
R11	Hotel – Premier Inn Bicester	11.4	11.4	0.0
R12	Residential – A4095	10.4	10.5	0.1
R13	Residential – A4095	11.7	11.9	0.2
R14	Residential – A4095	10.7	10.8	0.1
R15	Residential – Unnamed Road	10.3	10.3	0.0
R16	Residential – Unnamed Road	10.4	10.5	0.1
R17	Residential – A4095	11.3	11.4	0.1
R18	Residential – A4095	11.3	11.4	0.1
R19	Residential – A4095	11.3	11.5	0.2
R20	Residential – A4095	10.9	10.9	0.0
R21	Residential – A4095	10.7	10.7	0.0
R22	Residential – A4095	11.1	11.2	0.0
R23	Residential – Unnamed Road	10.5	10.5	0.0
R24	Bicester Hotel, Golf and Spa	10.6	10.6	0.0
R25	Bicester Hotel, Golf and Spa Grounds	12.2	12.2	0.0
R26	Bicester Hotel, Golf and Spa Grounds	15.4	15.4	0.0
R27	Bicester Hotel, Golf and Spa Grounds	13.7	13.7	0.0
R28	Bicester Hotel, Golf and Spa Grounds	14.6	14.6	0.0
R29	Residential – Bicester Park Homes	12.8	12.8	0.0
R30	Residential – Haydock Road	11.1	11.1	0.0

As indicated in Table A5-5, predicted annual mean PM<sub>2.5</sub> concentrations did not exceed the air quality objective of 25µg/m<sup>3</sup> at any sensitive receptor location where the annual mean objective applies.

Predicted impacts on annual mean PM<sub>2.5</sub> concentrations at the sensitive receptor locations are summarised in Table A5-6.

**Table A5-6: Predicted PM<sub>2.5</sub> Impacts**

Sensitive Receptor		% Change in Concentration Relative to AQO	Long Term Average Concentration	Significance of Impact
R1	Residential – A4095	0.2	75% or Less	Negligible
R2	Residential – A4095	0.3	75% or Less	Negligible
R3	Residential – A4095	0.4	75% or Less	Negligible
R4	Residential – A4095	0.5	75% or Less	Negligible
R5	Residential – A4095	0.3	75% or Less	Negligible
R6	Residential – Unnamed Road	0.2	75% or Less	Negligible

Sensitive Receptor		% Change in Concentration Relative to AQO	Long Term Average Concentration	Significance of Impact
R7	Residential – A4095	0.2	75% or Less	Negligible
R8	Residential – A4095	0.3	75% or Less	Negligible
R9	Residential – Church Lane	0.2	75% or Less	Negligible
R10	Residential – Caravan Park	0.2	75% or Less	Negligible
R12	Residential – A4095	0.2	75% or Less	Negligible
R13	Residential – A4095	0.6	75% or Less	Negligible
R14	Residential – A4095	0.3	75% or Less	Negligible
R15	Residential – Unnamed Road	0.0	75% or Less	Negligible
R16	Residential – Unnamed Road	0.1	75% or Less	Negligible
R17	Residential – A4095	0.5	75% or Less	Negligible
R18	Residential – A4095	0.5	75% or Less	Negligible
R19	Residential – A4095	0.5	75% or Less	Negligible
R20	Residential – A4095	0.3	75% or Less	Negligible
R21	Residential – A4095	0.2	75% or Less	Negligible
R22	Residential – A4095	0.4	75% or Less	Negligible
R23	Residential – Unnamed Road	0.1	75% or Less	Negligible
R29	Residential – Bicester Park Homes	0.2	75% or Less	Negligible
R30	Residential – Haydock Road	0.0	75% or Less	Negligible

As indicated in Table A5-6, the impacts on annual mean PM<sub>2.5</sub> concentrations as a result of the Proposed Development was predicted to be negligible at all sensitive receptor locations considered where the annual mean objective applies. As such, the overall significance of operational phase road traffic emission impacts on annual mean PM<sub>2.5</sub> was determined to be not significant in line with the EPUK/IAQM guidance<sup>1</sup>.

### Site Suitability

In line with the guidance stated in LAQM.TG(16)<sup>7.5</sup>, the 1-hour mean for NO<sub>2</sub> and the 24-hour mean for PM<sub>10</sub> air quality objectives apply to the Proposed Development. As such, this section considers the 1-hour mean and 24-hour mean pollutant concentrations at the Site.

### Predicted NO<sub>2</sub> Concentrations

#### Annual Mean

Annual mean NO<sub>2</sub> concentrations were predicted at three locations representative of sensitive land use at the Proposed Development for 2022 with the development in place and are summarised in Table A5-7.

**Table A5-7: Predicted Annual Mean NO<sub>2</sub> Concentrations**

Sensitive Receptor		Predicted Annual Mean NO <sub>2</sub> Concentration in the 2022 DS scenario (µg/m <sup>3</sup> )
PR1	Proposed Sensitive Receptor – Hotel	33.2
PR2	Proposed Sensitive Receptor – Hotel	30.1

Sensitive Receptor		Predicted Annual Mean NO <sub>2</sub> Concentration in the 2022 DS scenario (µg/m <sup>3</sup> )
PR3	Proposed Sensitive Receptor – Waterpark	49.7

For the hotel and waterpark at the Proposed Development, the hourly mean objective applies. For short term NO<sub>2</sub> concentrations, the methodology presented within LAQM.TG(16)<sup>ii</sup> allows the determination of compliance with the hourly mean NO<sub>2</sub> objective.

The maximum NO<sub>2</sub> concentration predicted at the Proposed Development in the DM scenario is 49.7µg/m<sup>3</sup>. As this is below the indicative criteria of 60µg/m<sup>3</sup>, exceedances of the 1-hour mean are considered unlikely.

NO<sub>2</sub> concentrations in the locale of the Proposed Development are therefore considered to be in compliance with the 1-hour mean air quality objective.

### Predicted PM<sub>10</sub> Concentrations

The methodology presented within LAQM.TG(16)<sup>ii</sup> has been used to determine compliance with the 24-hour mean PM<sub>10</sub> objective at the location representative of the hotel and waterpark at the Proposed Development.

Annual mean PM<sub>10</sub> concentrations were predicted at three locations representative of sensitive land use at the Proposed Development for 2022 with the development in place and are summarised in Table A5-8.

**Table A5-8: Predicted Annual Mean PM<sub>10</sub> Concentrations**

Sensitive Receptor		Predicted Annual Mean PM <sub>10</sub> Concentration in the 2022 DM scenario (µg/m <sup>3</sup> )
PR1	Proposed Sensitive Receptor – Hotel	19.1
PR2	Proposed Sensitive Receptor – Hotel	18.7
PR3	Proposed Sensitive Receptor – Waterpark	21.4

Based upon the maximum predicted annual mean PM<sub>10</sub> concentration of 21.4µg/m<sup>3</sup> modelled at receptor PR3, this equates to 5 days where 24-hour mean PM<sub>10</sub> concentrations are greater than 50µg/m<sup>3</sup>. Thirty-five 24-hour periods where concentrations are in excess of 50µg/m<sup>3</sup> are permitted and therefore, the number of maximum exceedances is in compliance with the 24-hour mean AQO.

### Significance of Air Quality Impacts

To determine the significance of predicted air quality impacts based upon a site-suitability assessment, such as that undertaken as part of this assessment, the EPUK/IAQM guidance<sup>i</sup> states:

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

With regards to the Proposed Development, the unmitigated impact significance associated with the Proposed Development has been predicted in accordance with the stated assessment methodology. The following factors have been considered when providing justification:

- The development proposals will not introduce any new receptor into an area of exceedance of the 1-hour mean NO<sub>2</sub> air quality objective based upon predicted NO<sub>2</sub> concentrations at the Proposed Development site; and

- The development proposals will not introduce any new receptor exposure into an area of exceedance of the annual mean PM<sub>10</sub> air quality objectives based upon predicted PM<sub>10</sub> concentrations at the Proposed Development site.

As no exceedances of the considered air quality objectives are predicted, mitigation measures are not required for the operational phase of the Proposed Development. Therefore, the overall effect is considered to be 'not significant'.

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<sup>i</sup> Environmental Protection UK and Institute of Air Quality Management (2017) Land-Use Planning & Development Control: Planning for Air Quality v1.2 –[online], Available: <http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf>

<sup>ii</sup> Defra (2018) Local Air Quality Management Technical Guidance (TG16) –[online], Available: <https://laqm.defra.gov.uk/documents/LAQM-TG16-February-18-v1.pdf>