



EAST PARK ENERGY

East Park Energy

EN010141

Environmental Statement

Volume 2 – Technical Appendices

Appendix 11-4: Additional PM_{2.5} Assessment

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1.0 PM_{2.5} Assessment

1.1 Introduction

1.1.1 The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 set two new targets for fine particulate matter (PM_{2.5}):

- A maximum annual mean concentration target of 10 µg/m³ to be achieved by 2040 (the AMCT); and
- A population exposure reduction target of 35% compared to 2018 to be achieved by 2040 (the PERT).

1.1.2 The purpose of the targets is to improve air quality by reducing levels of PM_{2.5} across the country, therefore improving public health. While achievement of the targets will be assessed at relevant monitoring sites, the targets apply to ambient (outdoor) air throughout England.

1.1.3 Planning applicants and Local Planning Authorities should therefore consider the impact of developments on air quality in all ambient air, whether a monitor is present or not. These targets require a different approach to that used by applicants and Local Authorities in response to existing air quality legislation.

1.1.4 Defra is developing guidance for applicants and Planning Authorities in England to demonstrate that they have appropriately considered the PM_{2.5} targets when making planning applications and planning decisions.

1.1.5 Pending publication of the new guidance, applicants are advised to provide evidence in their planning applications that they have identified key sources of air pollution within their schemes and taken appropriate action to minimise emissions of PM_{2.5} and its precursors as far as is reasonably practicable. A consultation on the new approach and guidance is expected to be published in 2025. In the meantime, Defra has issued interim guidance¹ to provide developers and planning authorities with clarity on how to consider the new targets whilst the full guidance is under development.

1.1.6 The interim guidance sets out a series of questions to be used as prompts to support the interim process.

1.1.7 The questions included in the interim guidance and responses relevant to this Application are set out in the next section.

1.2 Interim Guidance Questions

Question 1) How has exposure to PM_{2.5} been considered when selecting the development site?

Applicants are advised to consider the following in their application:

- *Site proximity to people (particularly large populations and/or vulnerable groups, e.g., schools, hospitals, care homes, areas of deprivation) and the impact of the development on these,*
- *Site proximity to pollution sources and the impact of these on users of the development,*
- *Exposure and emissions during both construction and in-use.*

Response:

1.2.1 **Section 11.6 of the ES Volume 1: Chapter 11: Air Quality [EN010141/DR/6.1]** describes the baseline conditions at the Site including the location of nearby residential properties and other sensitive human receptors, as illustrated on **ES Vol 3 Figures 11-1 and 11-2 [EN010141/DR/6.3]**.

1.2.2 The local air quality, including presence of any nearby Air Quality Management Areas (AQMAs), data obtained from local ambient air quality monitoring, and predicted data provided by Defra, is further detailed in **Section 11.6 and ES Vol 2 Appendix 11-2: Baseline Air Quality Data [EN010141/DR/6.2]**.

1.2.3 **Section 11.8 of the ES Volume 1: Chapter 11: Air Quality [EN010141/DR/6.1]** contains an air quality assessment considering potential

emissions that may arise during both the construction and decommissioning phases. Full details of the assessment methodologies are provided in **Section 11.4** and **ES Vol 2 Appendix 11-1: Air Quality Assessment Methodologies [EN010141/DR/6.2]**.

1.2.4 An operational phase air quality assessment was scoped out of the ES on the basis there would be a very low potential for significant environmental effect on air quality to occur in the operational phase.

1.2.5 The assessment detailed in **Section 11.8** includes:

- a construction phase and decommissioning phase dust assessment. This considers potential impacts on nearby receptors due to construction dust and PM₁₀. As PM_{2.5} forms a proportion of PM₁₀ this also considers PM_{2.5};
- An on-road vehicle emissions screening assessment. This considers the expected construction phase traffic numbers and routing and proximity of traffic movements to human receptors. As PM_{2.5} forms a proportion of PM₁₀ which may be emitted as emissions by vehicles (both as exhaust emissions and from brake and tyre wear) this also considers PM_{2.5};
- Non-road mobile machinery (NRMM) screening assessment. This considers potential NRMM and other on-site power plant that may be used during the construction and decommissioning phases) and proximity to human receptors.

1.2.6 Question 1 has therefore been considered within the application.

Question 2) What actions and / or mitigations have been considered to reduce PM_{2.5} exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of PM_{2.5} and its precursors?

Applicants are advised to explain (with evidence where possible) why each measure was implemented. Or, if no mitigation measures have

been implemented, why this was not proposed. Actions can refer to, but are not limited to, the following:

- *Site layout,*
- *The development's design,*
- *Technology used in the construction or installed for use in the development,*
- *Construction and future use of the development.*

Response:

- 1.2.7 **As set out in Section 11.7 an outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]** has been prepared as part of the application for development consent. If the DCO is granted, this oCEMP will be developed into a final Construction Environmental Management Plan (CEMP) once a contractor is appointed. The final CEMP(s) produced for any phase of the Scheme will be in substantial accordance with this oCEMP, as set by a Requirement of the **draft DCO [EN010141/APP/3.1]**, and approved by the relevant local planning authorities prior to construction.
- 1.2.8 The oCEMP includes several embedded mitigation measures that will directly or indirectly serve to minimise PM₁₀ (and hence PM_{2.5}) emissions. In addition, an outline Construction Dust Management Plan (oCDMP) is provided as an appendix to the oCEMP. The oCDMP has been informed by findings of the construction dust assessment described in **Section 11.8** to ensure the Scheme does not result in any significant effects due to dust during either the construction or decommissioning phases. The oCDMP will again be developed into a final CDMP once a contractor is appointed. Hierarchy for mitigation to be prevention, suppression then containment.
- 1.2.9 The oCEMP additionally includes provisions in relation to the use of NRMM.
- 1.2.10 The application for development consent is further supported by an **outline Construction Traffic Management Plan (oCTMP) [EN010141/DR/7.4]**.

This sets out the proposed access strategy and site management plan and would be developed into a final CTMP if the DCO is granted.

- 1.2.11 The application therefore includes measures, which are to be secured by the DCO, that would serve to reduce emissions of PM_{2.5} from the Proposed Development in accordance with Question 2.

2.0 REFERENCES

¹ Department for Environment, Food and Rural Affairs (2024). *PM_{2.5} Targets: Interim Planning Guidance*.