HOARE LEA

Air Quality Confirmation Statement.

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Tavis House.

Audit sheet.

Rev.	Date	Description of change / purpose of issue	Prepared	Reviewed	Authorised
00	26/03/2024	First Draft	BC	LC	AD
01	28/03/2024	First Issue	LC	AD	AD
02	12/06/2024	Second Issue	LC	AD	AD

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1. Introduction.

This Air Quality Confirmation Statement has been prepared on behalf of Tempus Realty Holdings 1 (Jersey) Ltd (the 'Applicant'), in support of the S73 application relating to the redevelopment of Tavis House which consists of the extension and refurbishment of Tavis House, 1-6 Tavistock Square, London, WC1H 9NA (the 'Site'). The Site is located within the London Borough of Camden (LBoC) area of administration.

This Air Quality Confirmation Statement considers the design changes to the approved development which include revision of the ground floor servicing yard to accommodate a nitrogen storage area and accompanying substation and redesign of the basement floor plant and other associated works in order to facilitate a laboratory use at the Site.

The Approved Scheme, planning reference number 2021/6105/P, was for *'Refurbishment and extension of the existing building to provide new entrances, a new roof top pavilion, roof top plant equipment and enclosures, rear extension and cycle parking associated with Class E use together with new hard and soft landscaping and other ancillary works* located at Tavis House, 1-6 Tavistock Square, London, WC1H 9NA.

An Air Quality Assessment (AQA) [REP-1013582-ED-5A-20211208-Tavis House-AQA-Rev02.pdf] (the 'Previous AQA') was submitted in December 2021 to support in the planning application for the Approved Scheme.

A Section 73 application is sought to vary Conditions 2, 9, 13 and 15 pursuant to planning permission reference 2021/6105/P, in order to reflect the proposed use of the building for life sciences. The description for the proposed application is: *"Variation of conditions 2, 9, 13 and 15 approved under planning permission reference 2021/6105/P on 1 December 2023 for 'Refurbishment and extension of the existing building to provide new entrances, a new roof top pavilion, roof top plant equipment and enclosures, rear extension and cycle parking associated with Class E use together with new hard and soft landscaping and other ancillary works'. NAMELY amendments to external rear facades, rooftop plant and other associated works."*

This Air Quality Confirmation Statement is to be submitted in support of S73 application, which includes proposals for a revised building design ('Updated Scheme'), to confirm that the conclusions of the Previous AQA remain valid for the Updated Scheme. This document should be read in conjunction with the Previous AQA.

2. Policy, Guidance and Legislation Changes.

There have been updates to the Policy, Guidance and Legislation section referenced within Section 2 of the Previous AQA. The updates have been detailed below for information and do not replace the Policy, Guidance and Legislation included within the Previous AQA submitted in December 2021.

Below is a list of Policy, Guidance and Legislation documents that have been updated or published since the submission of the Previous AQA:

- The Air Quality Strategy[1] has been updated annual mean $PM_{2.5}$ air quality objective (AQO), which reduced to 20 µg/m^3. The strategy also provides long term (10 µg/m^3 by 2040) and interim (12 µg/m^3 by 31st January 2028) $PM_{2.5}$ targets outlined in the Environmental Improvement Plan 2023[2, 3];
- The National Planning Policy Framework (NPPF) 2021[4] was updated to the NPPF 2023[5] in December 2023;
- Part F of the Building Regulations (2021)[6] which was published prior to the submission of the Previous AQA but took effect in June 2022 onwards;
- LBoC Clean Air Action Plan (CAAP) 2023-2026[7] was published in December 2022;
- Air Quality Neutral London Plan Guidance (AQN.LPG)[8] which was published in 2023 by the Greater London Authority (GLA)[9];
- The Environment Act 2021[10]; and
- The IAQM 'Guidance on the Assessment of Dust from Demolition and Construction' v2.2[11] which was published in January 2024 by the IAQM.

The following Policy, Guidance and Legislation documents have not been updated since the submission of the Previous AQA:

- Land-Use Planning & Development Control: Planning For Air Quality[12] which was published in January 2017 by Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM);
- The Air Quality Standards 2010[13];
- Statutory Nuisance Legislation[14];
- The Clean Air Strategy (CAS)[15];
- The London Plan 2021[16];
- The London Environmental Strategy[17];
- Camden Local Plan[18];
- Camden 2025[19];
- Our Camden Plan[20];
- Camden Transport Strategy 2019-2041[21];
- Mayor of London's London Local Air Quality Management Technical Guidance (LLAQM.TG(19))[22];
- Sustainable Design and Construction Supplementary Planning Guidance[23]; and
- Greater London Authority (GLA) 'Construction and Demolition Dust Guidance'[24].

The updated Policy, Guidance and Legislation documents will change the methodology in certain areas, such as air quality neutral assessment and the construction dust assessment, undertaken in the Previous AQA. The changes to the methodology have been detailed in Section 3 of this air quality confirmation statement.

3. Methodology.

This section reviews the methodology from the Previous AQA and updates to the methodology have been discussed in line with the changes to the latest policy, guidance and legislation documents where necessary.

3.1 Construction Phase.

The release of the most recent IAQM 'Guidance on the Assessment of Dust from Demolition and Construction' v2.2 in January 2024, provides updated thresholds for construction activities to define the potential dust emission magnitude. This accordingly impacts the risk of dust impacts from construction activities and recommended mitigation measures. The effect of these changes on the outcomes of the assessment are discussed in Section 5.1.

3.2 Operational Phase.

There are no changes required for the operational phase methodology for the proposals as there have been no updates to the guidance documents[12,22] referenced by the Previous AQA for the operational phase methodology.

3.3 Air Quality Neutral Assessment.

The AQN.LPG was updated in 2023 to include revised parameters for defining both the Building Emissions Benchmark (BEB) and Transport Emissions Benchmark (TEB). However, the thresholds for screening out an AQN assessment for minor developments in London have not changed. As such, the methodology used for the AQN assessment in the Previous AQA is still valid.

4. Changes to Baseline Environment.

The Previous AQA used the year 2019 as the baseline year with the inclusion of 2020 and 2021 monitoring data for information purposes only. Since the submission of the Previous AQA, monitoring data from 2022 has now been made available by the LBoC and it is presented in the most recent Annual Status Report (ASR) 2022[25].

Due to the impacts of the COVID-19 pandemic, monitoring data from the years 2020 and 2021 is not considered representative of 'normal' air quality conditions due to government-imposed lockdowns and has been included for information purposes only. 2022 monitoring data is considered representative and is therefore as the most recent year of representative monitoring data (the baseline year). Relevant updates have been made within this section.

4.1 Local Air Quality Monitoring.

Pollutant concentrations at all automatic monitoring stations and passive diffusion tube monitoring locations included within the Previous AQA have decreased from 2019 to 2022, the baseline year. The updated concentrations have all been presented in Table 1.

Table 1 outlines the past five years of representative monitoring data (2016-2019 and 2022) taken from the latest LBoC Air Quality Annual Status Report (ASR) 2022[25].

Table 1: Automatic Monitoring Station Results (2016 – 2022)

Monitoring Station and distance (km) from Site boundary (approx.)	Air Quality Objective	2016	2017	2018	2019	2020	2021	2022
NO_2								
Euston Road, Roadside, 0.28 km	Annual mean (µg/m^3)	88	83	82	70	43	48	45
	Number of hours with concentrations >200 µg/m^3	39	25	18	7	0	1	2
London Bloomsbury, Urban Background, 0.33 km	Annual mean (µg/m^3)	42	38	36	32	28	27	26
	Number of hours with concentrations >200 µg/m^3	0	0	0	0	0	0	0
PM_{10}								
Euston Road, Roadside, 0.28 km	Annual mean (µg/m^3)	24	20	21	22	18	19	21
	Number of days with concentrations >50 µg/m^3	10	3	2	8	2	2	6
London Bloomsbury, Urban Background, 0.33 km	Annual mean (µg/m^3)	20	19	17	18	16	16	17
	Number of days with concentrations >50 µg/m^3	9	6	1	9	4	0	5
$PM_{2.5}$								
Euston Road, Roadside, 0.28 km	Annual mean (µg/m^3)	17	14	15	14	11	11	12

Monitoring Station and distance (km) from Site boundary (approx.)	Air Quality Objective	2016	2017	2018	2019	2020	2021	2022
London Bloomsbury, Urban Background, 0.33 km	Annual mean (µg/m^3)	12	13	10	11	9	9	9
Notes: Concentrations in **bold** indicate an exceedance of the relevant AQO Concentrations in LBoC ASR rounded to the nearest whole number. Data taken from 2023 Annual Status Report (ASR)[25]								

From Table 1, pollutant concentrations of NO_2, PM_{10} and $PM_{2.5}$ have all decreased in 2022, the current baseline year when compared to 2019, the previous baseline year. There are no exceedances of PM_{10} or $PM_{2.5}$ in relation to their respective AQOs. However, at Euston Road, exceedances of the annual mean NO_2 AQO and WHO guidelines for NO_2, PM_{10} and $PM_{2.5}$ are still occurring in 2022.

Moreover, there have been no recorded exceedances of the 1-hour mean NO_2 AQO at any automatic monitoring station nearby the Site in 2022.

In the Previous AQA, nine passive diffusion tube monitoring locations within 1 km of the Site were assessed. The monitoring data was taken from the LBoC ASR 2020[26].

However, according to the most recent LBoC ASR 2022[25], the passive diffusion tube monitoring locations from the Previous AQA have all either been relocated or reassessed by LBoC. The most relevant passive diffusion tube monitoring locations with respect to the Site are shown in Table 2 below.

Table 2: Passive Diffusion Tube Monitoring Results (2016 – 2022) from the LBoC ASR 2022

Site ID	Site Type	Site Name	Distance (m) from Site (approx.)	Annual Mean NO_2 Concentration (µg/m^3)						
				2016	2017	2018	2019	2020	2021	2022
CAM79	Urban Background	Tavistock Gardens	70	40	**46**	35	34	27	22	24
CAM189	Roadside	Torrington-Tavistock/Midland-Judd 11 - Tavistock Place	120	n/d	n/d	**47**	40	32	30	30
CAM204	Roadside	Torrington-Tavistock/Midland-Judd 26 - Upper Woburn Place	130	n/d	n/d	**68**	**59**	**43**	37	37
CAM196	Roadside	Torrington-Tavistock/Midland-Judd 18 - Leigh Street	270	n/d	n/d	**47**	39	30	27	26
CAM80	Roadside	Endsleigh Gardens	280	n/d	n/d	n/d	**50**	35	34	30
CAM194	Roadside	Torrington-Tavistock/Midland-Judd 16 - Tavistock Place/Regent's Square	380	n/d	n/d	**48**	**41**	29	28	27
Notes:										

Site ID	Site Type	Site Name	Distance (m) from Site (approx.)	Annual Mean NO_2 Concentration (µg/m³)						
				2016	2017	2018	2019	2020	2021	2022
n/d – no data Concentrations rounded to the nearest whole number. Concentrations in **bold** indicate an exceedance of the annual mean AQO. Exceedances of the 60 µg/m³ threshold which indicate a potential exceedance of the 1-hour mean NO_2 AQO, in line with LLAQM.TG(19)[22] have been underlined.										

From the most relevant passive diffusion tube monitoring locations within the LBoC ASR 2022[25], there has been an improvement on recorded concentrations between 2019 and 2022. Moreover, there are no exceedances of the NO_2 annual mean AQO or WHO guideline was recorded in 2022, the baseline year.

4.2 Defra Predicted Background Concentrations.

Defra predicted background concentrations[27] have been obtained from the national maps published by Defra for pollutants NO_2, PM_{10} and $PM_{2.5}$ in the year 2022, the baseline year, for the 1 km by 1 km grid square in which the Site is located. Defra predicted background concentrations[27] in 2022 have all decreased since the previous baseline year of 2019.

Defra predicted background concentrations for 2026, the expected opening year for the Development, and concentrations for all relevant pollutants are below their respective AQOs. Moreover, NO_2 and PM_{10} background concentrations are in compliance of their respective WHO guidelines. However, $PM_{2.5}$ background concentrations are in exceedance of the relevant WHO.

4.3 London Atmospheric Emissions Inventory (LAEI).

The Previous AQA presented the LAEI annual mean concentration maps for a historic year (2016) and future year (2020) which are based on a baseline year of 2013.

Since the Previous AQA, the GLA have updated and released LAEI modelled annual mean concentration maps for a new future year (2025). LAEI modelled annual mean concentrations for 2025 have been presented as it is closer to 2026, the earliest anticipated opening year for the Proposed Development.

The worst-case concentrations of key pollutants in 2025 are shown in Table 3 for the Site. These concentrations have been taken from the southwestern boundary of the Site which bounds Woburn Place.

Table 3: Annual Mean Concentrations of NO_2, PM_{10} and $PM_{2.5}$ taken from the LAEI Annual Mean Concentration Map

Year	Pollutant Concentration (µg/m³)		
	NO_2	PM_{10}	$PM_{2.5}$
2025	27.3	18.5	11.5

Predicted annual mean concentrations of NO_2 and PM_{10} for 2025, at the southwestern eastern boundary of the Site, are in compliance with their respective annual mean AQOs and WHO guidelines. The predicted annual mean concentration for $PM_{2.5}$ are below the annual mean $PM_{2.5}$ AQO, however it is in exceedance of the WHO guideline.

4.4 Comparison of Available Baseline Data.

A regression analysis has been conducted using monitoring data from the LBoC ASR 2022[25] at all passive diffusion tube monitoring locations within the LBoC administrative area. This has been carried out using five years of representative monitoring data from 2016 to 2022. The regression analysis has not included 2020 or 2021 monitoring data as these years have not been deemed representative. Linear regression indicates that annual mean NO_2 concentrations are decreasing at an average rate of approximately 6.7 µg/m^3 per year. This trend is considered statistically significant and is illustrated in Figure 1.

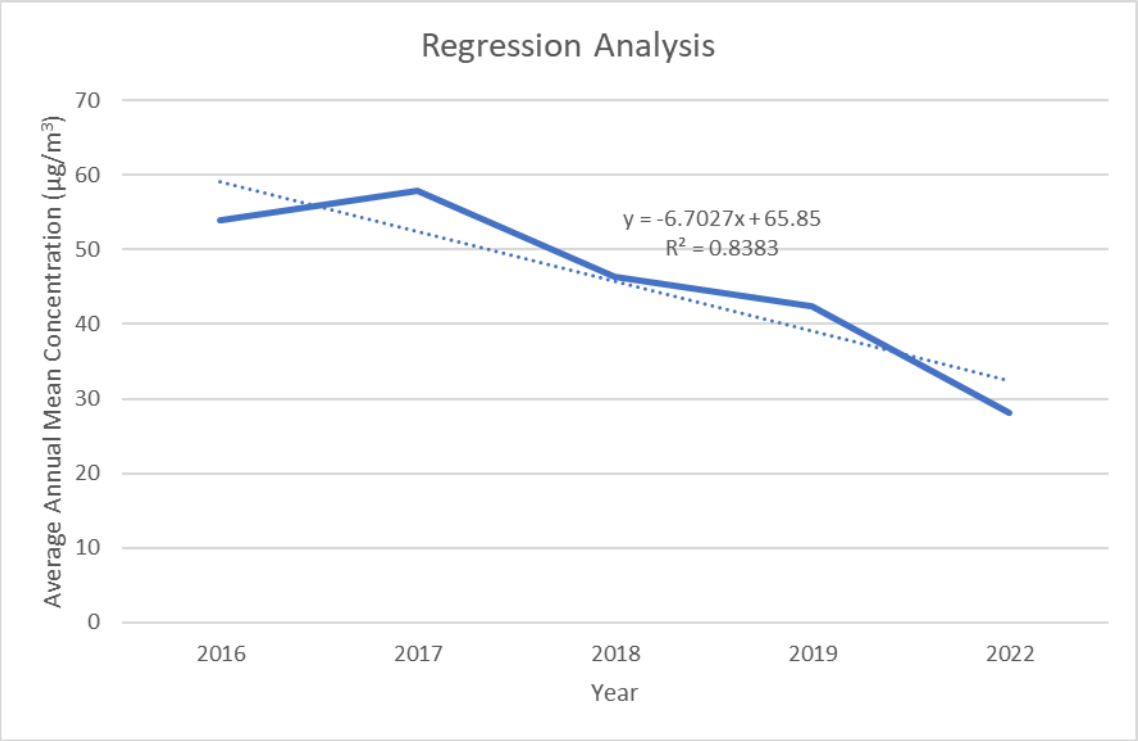

Figure 1: Regression Analysis of Annual Mean NO_2 Concentrations from Passive Diffusion Tube Monitoring Locations in LBoC.

4.5 Summary.

A review of updated baseline information has shown that concentrations of NO_2, PM_{10} and $PM_{2.5}$ within the LBoC area of administration, have decreased from 2019, the baseline year used within the Previous AQA to 2022, the current baseline year.

5. Review of Impact Assessment.

5.1 Construction Phase.

The Updated Scheme includes demolition activities in which part of the existing building fabric is expected to be demolished. Due to the nature of demolition activities, up to 20 m above ground, the dust emission magnitude for demolition has been classed as large. As such, the risk of dust impact for demolition activities is identified as high risk for dust soiling impacts and medium risk for human health impacts.

The Updated Scheme also includes a change in gross internal area for the Proposed Development. However, there will not be any changes to the dust emission magnitude classification for construction activities taking account of the most up to date IAQM construction guidance[11] and as such, it remains classed as small. In addition, the dust emission magnitude classification for earthworks and trackout is not expected to change. Therefore, the risk of dust impacts for construction, earthworks and trackout, identified in the Previous AQA, remain valid.

The phrasing of previously identified construction dust mitigation measures (found in Table 10 of the Previous AQA) has changed but the mitigation measures, including those targeted for earthworks, construction and trackout, remain the same. Following the updated IAQM construction guidance released in 2024, an additional mitigation measure has been added for a low risk classification. The additional mitigation measure relevant to the Updated Scheme is included in Table 4.

Moreover, Table 4 includes recommended mitigation measures targeted for demolition which considers high risk measures for demolition only.

Table 4: Updated Mitigation Measures

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

5.2 Operational Phase.

5.2.1 Road Traffic Emissions

The Updated Scheme has been confirmed to generate less operational phase road traffic than the Approved Scheme as per information received by Motion, the transport consultants appointed for the project ('R05-Tavis House-Addendum TS 24-03-18 d1.0.pdf'). As per the Addendum Transport Statement, produced by Motion, the Updated Scheme for science and research use is likely to generate fewer trips compared to a typical office use.

It should be noted that the Approved Scheme was already associated with a reduction in car parking provision causing a net decrease in operational phase road traffic on the local road network as a result of the operation of the Proposed Development. The Updated Scheme is therefore expected to provide a further reduction in traffic generated and as such an improvement in traffic emissions as a result of operation of the Site.

Therefore, the assessment undertaken remains valid and in accordance with the EPUK and IAQM planning guidance[12], the impacts on air quality from operational phase traffic generation are considered to be not significant, as in the Previous AQA, and it can be screened out.

5.2.2 Energy Strategy

The energy strategy continues to be all electric, since the Previous AQA, with the addition of Photovoltaic panels and one standby generator. The standby generator is proposed to be used for life safety and tenant essential load purposes only.

It has been confirmed by Hoare Lea, the mechanical, electrical and public health (MEP) engineers for the project, that the testing schedule for the standby generator will be approximately 2 hours per year. As such, the generator is expected to be in operation for less than 18 hours a year and it is therefore unlikely to lead to an exceedance of the 1-hour mean NO_2 AQO at the Site. Moreover, Hoare Lea MEP has recommended the use of hydrotreated vegetable oil instead of diesel fuel, which is more beneficial from an air quality perspective, due to its reduced emissions of nitrogen oxides.

Notwithstanding the above, it has also been recommended that the standby generator testing is limited to when the courtyard is not in use to reduce the risk of air quality impacts on the users of the Updated Scheme.

As such, the outcomes from the Previous AQA with regard to the energy strategy remain valid.

5.2.3 Site Suitability

The location of the Site is unchanged. However, the Site will incorporate a new land use (science and research) during operation. Despite the change in land use, only the short term AQO for NO_2 still applies. However, in line with Part F of the Building Regulations (2021), the annual mean NO_2 AQO also applies to the Site although not being required for planning purposes.

The updated baseline review has confirmed that monitored concentrations of NO_2 recorded at automatic monitoring stations and passive diffusion tube monitoring locations in 2022, the baseline year are lower than the concentrations reported in 2019 from the Previous AQA. Therefore, NO_2 concentrations at the Site are likely to be lower in 2022 compared to 2019.

As such, the conclusions of the Site Suitability assessment carried out in the Previous AQA remain valid, as a worst-case scenario, for annual mean and 1-hour mean NO_2 concentrations and the Site remains suitable for the proposed end use. Therefore, updates to Site Suitability assessment are not required.

5.3 Air Quality Neutral

In the Previous AQA, an Air Quality Neutral (AQN) assessment was scoped out. This was due to the internal floor space area as a result of the Proposed Development being less than the 1,000 m^2 threshold to require an AQN assessment. Despite the update to the Air Quality Neutral London Plan Guidance (AQN LPG) in 2023, the thresholds for an AQN assessment requirement has not changed and therefore an AQN assessment is not required.

6. Summary and Conclusions.

This confirmation statement summarises the assessment changes since the Previous AQA. Due to the updated proposals for the Updated Scheme, a review of more up to date air quality information has been undertaken and the findings are summarised below:

- A review of updated Policy, Guidance and Legislation documents has been carried out and has confirmed that the conclusions of the Previous AQA remain valid and in line with all relevant Policy, Guidance and Legislation documents;
- A review of updated baseline air quality conditions has shown that air quality has improved from 2019, the baseline year in the Previous AQA, to 2022, the current baseline year. As such, the conclusions of the Previous AQA remain the same;
- A review to the construction phase assessment was carried out and it has been confirmed that the conclusions from the Previous AQA remain the same. An additional mitigation measure has been included as a result of the updated IAQM construction guidance;
- A review of the trip generation associated with the Updated Scheme has confirmed that there a decrease in operational phase road traffic trips is likely when compared to the Approved Scheme as a result of the change in use. As such, the relevant criteria within the EPUK and IAQM planning guidance is likely to not be exceeded and the impacts on air quality from operational phase traffic generation are considered to be not significant. As such, the conclusions of the Previous AQA remain the same;
- The proposed energy strategy remains all-electric since the Previous AQA with the addition of a standby generator, which is proposed to be used for testing and life safety purposes only. As such, the outcomes from the energy strategy in the Previous AQA remain the same;
- The Site remains suitable for its proposed use. It has been noted there is an improvement to air quality pollutant concentrations monitored in the vicinity of the Site when comparing 2022, the current baseline year to 2019, the baseline year used in the Previous AQA. As such, the Site remains suitable for its proposed use and updates to the Site Suitability assessment are not required; and
- The AQN guidance has been updated since the submission of the Previous AQA, however there has been no changes to the requirement threshold for an AQN assessment. As such, an updated AQN assessment is not required and therefore, the conclusions of the Previous AQA remain the same.

Based on these findings, the proposals for the Updated Scheme are not expected to lead to no worsening of air quality impacts. The conclusions from the Previous AQA remain valid in terms of air quality and the mitigation measures recommended are still applicable. No further assessment of impacts is required.

It is considered that air quality should not be viewed as a constraint to planning and the Site conforms to the principles of NPPF, the London Plan 2021 and the Camden Local Plan.

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