
# CAMDEN GOODS YARD

Air Quality Assessment Addendum

March 2025

# ST GEORGE WEST LONDON LIMITED

# CAMDEN GOODS YARD, CHALK FARM, CAMDEN

# FEBRUARY 2025 SECTION 73 APPLICATION AIR QUALITY ASSESSMENT

## REPORT REF.

## 2205801 – R07

## March 2025


**HEAD OFFICE**: 3rd Floor, The Hallmark Building, 52-56 Leadenhall Street, London, EC3M 5JE **T** | 020 7680 4088

**EDINBURGH:** Suite 35 4-5 Lochside Way Edinburgh EH12 9DT **T** | 0131 516 8111

**ESSEX**: 1 - 2 Crescent Court, Billericay, Essex, CM12 9AQ **T** | 01277 657 677

**KENT**: Suite 10, Building 40, Churchill Business Centre, Kings Hill, Kent, ME19 4YU **T** | 01732 752 155

**MIDLANDS**: Office 3, The Garage Studios, 41-43 St Mary's Gate, Nottingham, NG1 1PU **T** | 0115 697 0940

**SOUTHWEST**: Temple Studios, Bristol, England, BS1 6QA **T** | 0117 456 4994

**SUFFOLK**: Suffolk Enterprise Centre, 44 Felaw Street, Ipswich, IP2 8SJ **T** | 01473 407 321

**Email**: enquiries@ardent-ce.co.uk; airquality@ardent-ce.co.uk

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## Distribution

# 1 Introduction

**Proposed Development**

1.1 This document has been prepared by Ardent Consulting Engineers (ACE) on behalf of St George West London Limited ('the Applicant'), to assess air quality impacts of the proposed S73 application to vary the extant planning permission for the Camden Goods Yard project. The Planning Statement provides the full description of the proposal.

1.2 This S73 application comprises the proposed amendments in respect of Blocks C, D, E1, E2 and F of the Main Site Parcel, identified in the detail within the DAS Addendum enclosed as part of the application and identified here for ease of reference:

- Insertion of secondary stairs to Blocks C, E1 and F in accordance with fire safety guidelines for residential dwellings
- Reduction of affordable housing from 38% to 15% by habitable room (from 203 to 83 homes)
- Minor tenure and unit mix changes to approved plans
- Marginal increase to footprint of Block E1 (0.5m on the east, west and north elevations) to accommodate a secondary staircase
- Minor reduction in heights of Blocks C, D, E1, E2 and F

1.3 The following conditions attached to the Operative Permission control development and are the subject of this S73 Application for the Proposed Development:

- **Condition 3, 4 and 6** – approved drawings and documents – these contains drawings which identify affordable homes (references amended) and new drawings are submitted to comply with fire regulations including a second stair core introduced into Blocks C, E1 and F and associated changes.
- **Condition 5** – contains drawings which identify affordable homes (references amended). The condition also refers to the 'affordable housing statement (June 2017)' which is amended.
- **Condition 73** refers to '203 affordable' homes. This will be revised to '83 affordable homes'. The condition also refers to a total of 27,983 sqm GEA of non-residential floorspace. This is revised to 28,792 sqm, a de-minimis

increase of 809 sqm following re-measurement of the scheme and marginal building footprint increase to buildings E1. We also note that the 2,769 sqm GEA of ancillary floorspace (gym, concierge, plant room, parking and energy centre) previously referred to in condition 73 (2020/3116/P, dated 3rd December 2022) has unintentionally been omitted from the Operative Permission and is proposed for reinserted.

**Scope**

1.4 An air quality assessment was previously carried out by ACE and submitted as part of the original planning application 2017/3847/P (ACE Report reference 160630-13A). The application was also accompanied by an Environmental Statement (the (2017 ES) which included an air quality assessment at Chapter 8.

1.5 For the May 2020 Consented Scheme, the potential changes in air quality impacts were assessed. Based on the scale and type of changes to the scheme, it was concluded that these did not alter the conclusions of the air quality assessment for the 2017 ES.

1.6 An air quality addendum report was also completed in December 2020 as part of the December 2020 S73 Application (2020/3116/P) (ACE report reference 196121-02A).

1.7 The addendum concluded that there were no air quality constraints or new/altered impacts relating to the December 2020 Amended Proposed Development and the conclusions of the 2017 ES remained valid.

1.8 A further S73 application was approved in March 2023 (2022/36346/P) which related to minor material amendments to the PFS site parcel of CGY only. An air quality technical note was completed by ACE (ACE Report Reference 2105800-04E) for this application which concluded no material changes in air quality associated with the proposed changes to the PFS site. There will be no material changes to the PFS site as part of the February 2025 Amended Proposed Development and therefore the conclusions of the previous assessments remain valid with air quality impacts remaining as negligible.

1.9 The development proposals being assessed within the February 2025 Amended Proposed Development relate to the Main Site and therefore will not result in any changes in air quality impacts considered within the March 2023 Consented Scheme which related to the PFS site. The assessment set out within this report therefore compares any potential changes in air quality against the December 2020 S73 Application and associated air quality addendum due to the conclusions of the assessment for the March 2023 Consented Scheme remaining valid.

1.10 The purpose of this Addendum Report is to assess the relevant changes associated with the February 2025 Proposed Amended Development in the context of air quality, considering changes that have occurred in legislation, guidance and baseline data since the previous assessments were carried out. Relevant changes considered within this report are set out below.

***Changes to Development***

1.11 The full description of the development changes is set out in the Planning Statement and DAS and summarised at Section 1.2.

1.12 In terms of air quality, the amendments include the following:

- Update to energy strategy – resulting in changes to energy emissions.

1.13 The energy strategy for the Site will be all electric, using Air Source Heat Pumps (ASHP) in conjunction with renewable sources such as Photovoltaic Cells (PV). These energy sources do not generate any on-site emissions therefore no assessment of on-site energy related emissions is required. This will also conclude a negligible impact with a reduction in emissions compared to the scheme assessed within the 2017 ES, which included Combined Heat and Energy Plant (CHP) and associated combustion related emissions. These potential emissions have been removed from the development proposals.

***Changes to Policy and Guidance***

1.14 Since the previous assessments were undertaken the following updated, amended, and new policy and guidance documents have been published:

- National Planning Policy Framework (Ministry of Housing Communities and Local Government, 2024)– published in December 2024
- 2021 London Plan - published on 2nd March 2021
- London Local Air Quality Management (Mayor of London, 2019) - published on 25th July 2019
- Defra Local Air Quality Management Technical Guidance 2022 (DEFRA, 2022) – published 4th April 2023
- Camden Air Quality Supplementary Planning Guidance (SPD) (London Borough of Camden, 2021) – published January 2021
- Institute of Air Quality Management: Guidance on the Assessment of Dust from Demolition and Construction (IAQM, 2024) – Published January 2024
- GLA London Plan Guidance (GLA, 2023) – Air Quality Neutral – Published February 2023
- GLA London Plan Guidance (GLA, 2023) – Air Quality Positive – Published February 2023

1.15 Details of the relevant amendments are set out later in this report and where these impact on the approach or conclusion drawn from the previous assessment, additional assessment has been included within this report.

1.16 Of note is the publication of the Air Quality Positive guidance and a requirement for all development subject to an ES to produce an Air Quality Positive Statement (AQPS). An AQPS statement has been undertaken relating to those parts of the development falling within the February 2025 Proposed Amended Development. The AQPS has been provided as a separate document (ACE Reference 2205801 – R02).

***Changes to baseline***

1.17 Since the previous assessments were carried out there have been several changes to baseline data. These include:

- More recent measures concentrations; and
- Updates to emissions and other data published by Defra which were utilised within the assessments.

1.18 Defra have updated their tools and emissions including:

- Updated vehicle emissions data – Emission Factor Toolkit EFTv12 – published in August 2024;
- Revised background concentrations – published November 2024.

1.19 The changes to the Defra data would not result in a material change to the outcome of the previous assessments and therefore no amendments to any previous modelling work or assessment of operational impacts have been carried out, particularly given the proposals will not result in any changes to operational traffic.

***Scope for Addendum***

*Demolition and Construction Stage*

1.20 The IAQM published revised guidance for assessing impacts from construction and demolition in January 2024. However, the amended guidance would not result in any significant change to the outcome of the previous construction impact assessment set out within the 2017 ES. The mitigation measures recommended and set out within the 2017 ES remain unchanged and therefore no additional assessment of construction related impacts has been carried out.

1.21 There will be minor changes to the footprint of Blocks C, D, E1, E2 and F, however the proposed changes will not significantly change the expected construction traffic generated during this stage. No amendments have therefore been made to this part of the assessment and the outcome of the 2017 ES remains unchanged in relation to construction traffic impacts.

1.22 No additional construction impact assessment has been carried out.

*Completed Development Stage*

1.23 This report includes an updated description of the existing air quality within the study area and consideration of the suitability of the site for the February 2025 Amended Proposed Development.

1.24 An updated Air Quality Neutral (AQN) assessment has been undertaken in accordance with the 2023 GLA guidance.

1.25 The revised elements of this assessment have been prepared considering relevant local and national guidance, policy, and legislation.

1.26 This air quality report is a Technical Appendix to the February 2025 Environmental Implications Letter (EIL) and should be read in conjunction with the following:

- June 2017 Environmental Statement (ES) Volume 1 Main ES Report, Chapter 8 Air Quality;
- December 2020 Consented S73 Application Air Quality Assessment Addendum;
- March 2023 Consented S73 Application Air Quality Technical Note; and
- February 2025 EIL and associated documents (accompanying this application).

# 2 Policy, Legislation and Guidance

2.1 Details of the legislation, Policy and Guidance which has been released or updated since the previous assessments were carried out are provided below. As previously noted, only the GLA AQN guidance materially alters this assessment, however, other updates are included for completeness.

**National Planning Policy**

National Planning Policy Framework

2.2 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development. To ensure this, the NPPF recognises 3 overarching objectives, including the following of relevance to air quality:

> *"Chapter 2 Achieving sustainable development*
>
> *Para. 8*
>
> *c) an environmental objective - to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

2.3 Chapter 15 of the NPPF details objectives in relation to conserving and enhancing the natural environment. It states that:

> *"Chapter 15 Conserving and enhancing the natural environment*
>
> *Para. 187*
>
> *Planning policies and decisions should contribute to and enhance the natural and local environment by:*
>
> *[…]*

*Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels 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 such as river basin management plans;*

2.4 The NPPF specifically recognises air quality as part of delivering sustainable development and states that:

*"Ground conditions and pollution*

*Para. 199*

*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."*

2.5 The implications of the NPPF have been considered throughout this assessment.

**Regional Planning Policy**

The London Plan

2.6 In London, a London Plan has been developed (Mayor of London, 2021). This includes several references to air quality; however, these are all incorporated into policy SI1: Air Quality, which states:

*A. Development Plans, through relevant strategic, site-specific and area-based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.*

*B. To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:*

*1. Development proposals should not:*

*a) lead to further deterioration of existing poor air quality;*

*b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; and*

*c) create unacceptable risk of high levels of exposure to poor air quality.*

*2. In order to meet the requirements in Part 1, as a minimum:*

*a) development proposals must be at least Air Quality Neutral;*

*b) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures;*

*c) major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1; and*

*d) development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.*

*C. Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:*

*a) how proposals have considered ways to maximise benefits to local air quality; and*

*b) what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.*

*D. In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.*

*E. Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development."*

**Local Planning Policy**

*Camden Air Quality Planning Guidance*

2.7 The Camden Air Quality SPD was produced to support the policies set out in the Camden Local Plan 2017.

2.8 The guidance sets out criteria for determining when an air quality assessment is required, what should be included within an air quality assessment and how air quality should be assessed. The guidance also confirms that all development should be Air Quality Neutral, and an Air Quality Positive approach is required from large scale and EIA development.

2.9 As detailed in the SPD, LBC have adopted the World Health Organisation (WHO) guideline limits for $NO_2$, $PM_{10}$ and $PM_{2.5}$. These limits are set out in Table 2-1 and have been used in the assessment of site suitability (exposure). However, to take account of uncertainty in $NO_2$, concentrations LBC have adopted an annual limit of 38 µg/m$^3$.

**Table 2-1: WHO Air Quality Guideline Limits**

| Pollutant | WHO Guideline Limit | |
|---|---|---|
| | Concentration (µg/m$^3$) | Averaging Period |
| $NO_2$ | 38 (the 40 µg/m$^3$ WHO limit less 5% based on uncertainty) | Annual Mean |
| | 200 | 1-hour mean, not to be exceeded on more than 18 occasions per annum |
| $PM_{10}$ | 20 | Annual mean |
| | 50 | 24-hour mean, not to be exceeded on more than 35 occasions per annum |
| $PM_{2.5}$ | 10 | Annual Mean |

2.10 The guidance also sets out details on minimising emissions to air for all stages of development.

**Guidance**

*Defra Technical Guidance 2022 (LAQM.TG(22)*

2.11 LAQM.TG(22) updates the previous LAQM.TG(16), setting out support to local authorities in carrying out their duties under the Environment Act 1995, as amended by the Environment Act 2021.

2.12 The guidance sets out any updates to approaches and methodologies for assessing air quality in accordance with the regulations and includes technical guidelines on carrying out modelling assessments and management of monitoring data which set out best practice and are, therefore, relevant to all air quality assessments.

*London Local Air Quality Management Technical Guidance (LLAQM.TG(19)*

2.13 The LLAQM.TG(19) guidance was published for use by London local authorities for review and assessment work and includes several technical guidelines on carrying out modelling assessment and management of monitoring data which set out best practice and are, therefore, relevant to all air quality assessments.

*IAQM Guidance on the Assessment of Dust from Demolition and Construction*

2.14 The IAQM updated guidance includes a methodology for identifying the risk magnitude of potential dust sources associated with demolition, construction, earthworks and trackout. This is used to identify the level of mitigation necessary for the overall residual effect to be 'not significant'. 'The Control of Dust and Emissions During Construction and Demolition' SPG (GLA, 2014) published by the GLA is based on this guidance, however, the GLA guidance states that the latest IAQM guidance should be used where published subsequent to the London Guidance.

*GLA London Plan Guidance: Air Quality Neutral*

2.15 In February 2023, the 'London Plan Guidance; Air Quality Neutral' was published by the GLA following a period of consultation. This guidance sets out the updated methodology for considering the 'air quality neutrality' of new developments, including details of updated 'air quality neutral' benchmarks (see Appendix B), as well as recommendations regarding mitigation and offsetting.

# 3 Methodology

### Baseline Air Quality

3.1 Information regarding baseline air quality has been obtained by collating the results of monitoring carried out by London Borough of Camden LBC) and data set out within the 2021 based Defra background maps (DEFRA, 2024).

### Air Quality Neutral

3.2 The approach set out in the 2023 AQN guidance has been followed to assess whether the proposed development is air quality neutral. The February 2025 Amended Proposed Development has been assessed in terms of both building and transport emissions.

# 4 Baseline Conditions

### Site Context and Study Area

4.1 The area surrounding the Application Site is largely unchanged since the previous assessments. The Application Site is located approximately 70m south of Chalk Farm Road, which is the closest busy road. The Site is formed of two adjoining parcels of land spatially separated by an elevated railway line.

4.2 The PFS parcel is now occupied by the completed Phase 1a development, the Morrisons Temporary Store, which opened in February 2021, replacing the former petrol filling station.

4.3 The Main Site parcel is under construction with demolition of the Morrison Store completed, the basement completed and Blocks A and B completing in 2025 and 2026, respectively.

4.4 The study area for this addendum in relation to air quality is defined as:

- The area within the boundary of the Main Site and sources which will influence air quality within this area as part of the assessment of site suitability.

4.5 The defines study area relates specifically to the Main Site due to the proposed amendments which relate to buildings within the Main Site rather than the whole site which includes the PFS site.

### Camden LAQM

4.6 LBC has assessed air quality within its area as part of its responsibilities under LAQM. A whole borough AQMA was declared in 2022 due to exceedances of the 24-hour mean $PM_{10}$ objective and annual mean $NO_2$ objective. This AQMA remains in place.

4.7 Part of Chalk Farm Road has been designated as an Air Quality Focus Area (AQFA).

4.8 The Site falls within the AQMA but not within the AQFA.

### Air Quality Monitoring

4.9 LBC carried out monitoring of $NO_2$ at 5 automatic and 329 diffusion tube monitoring sites in 2023. The closest and most representative monitoring locations to the Site are set out in Table 4-1 along with data recorded since 2018.

4.10 Their locations in relation to the Site are shown in Figure 4-1. Exceedances of the LBC annual mean limit are shown in bold.

**Table 4-1: Local Monitoring – $NO_2$**

| Site | Monitor Type | Monitored $NO_2$ Concentration (µg/m$^3$) | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 |
| CAM10 – Princess Road | Roadside | - | - | 23.5 | 20.2 | 19.9 | 22.6 |
| CAM45 – Crogsland Road South | Roadside | - | - | - | 23.4 | 23.4 | 23.2 |
| CAM62 – Maldon Road North | Roadside | **49.8** | **42.6** | - | 30.2 | 29.1 | 30.2 |
| CAM63 – Prince of Wales Road | Roadside | 35.1 | 33.7 | 21.9 | 22.5 | 20.7 | 24.0 |
| CAM64 – Prince of Wales Road | Roadside | **38.3** | 36.6 | 22.1 | 23.5 | 22.5 | 22.3 |
| CAM65 – Crogsland Road | Roadside | 35.6 | 33.1 | 21.6 | 20.4 | 21.4 | 24.2 |
| CAM66 – Malden Crescent | Roadside | **38.5** | 34.5 | 23.7 | 24.5 | 23.6 | 27.2 |
| CAM67 – Prince of Wales Road | Roadside | **46.5** | **41.2** | 26.7 | 30.3 | 28.6 | 31.8 |
| CAM69 – Prince of Wales Road | Roadside | **45.9** | **39.1** | 25.5 | 27.1 | 26.0 | 25.5 |
| CAM121 – Haverstock Road | Roadside | **-** | 33.1 | 23.5 | 21.0 | 22.0 | 21.2 |
| CAM122 – Harmood Street | Roadside | **-** | 31.7 | 24.9 | 20.1 | 18.5 | 18.4 |

| Site | Monitor Type | Monitored $NO_2$ Concentration ($\mu g/m^3$) | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 |
| CAM123 – Hartland Road | Roadside | - | 31.8 | 26.1 | 20.7 | 21.4 | 19.6 |
| CAM124 – Hawley Primary Sch | Roadside | - | **42.9** | 34.1 | 26.8 | 27.9 | 28.4 |
| CAM125 – Kentish Town Road | Roadside | - | **45.0** | 33.8 | 27.8 | 28.0 | 26.1 |
| CAM126 – Hawley Crescent | Roadside | - | **38.9** | 32.3 | 25.7 | 26.4 | 22.1 |
| CAM127 – Jamestown Road | Roadside | - | **38.7** | 29.9 | 25.8 | 22.6 | 21.1 |
| CAM128 – Camden High St | Roadside | - | **41.5** | 33.1 | 26.3 | 27.2 | 25.5 |
| CAM129 – Camden High St | Roadside | - | **38.8** | 30.5 | 29.7 | 27.9 | 26.2 |
| CAM132 – Cavendish School | Roadside | - | 33.9 | 26.9 | 22.7 | 23.3 | 20.6 |
| CAM133 – Holy Trinity & St Silas Sch | Roadside | - | 28.1 | 22.1 | 17.9 | 19.9 | 18.0 |
| CAM134 - Chalk Farm Road | Roadside | - | 31.4 | 22.2 | 20.9 | 21.5 | 23.3 |
| CAM135 - Chalk Farm Road | Roadside | - | **42.4** | 33.3 | 27.1 | 26.7 | 32.0 |
| CAM137 - Chalk Farm Road | Roadside | - | 33.7 | 25.2 | 22.7 | 22.8 | 25.5 |
| Numbers in **BOLD** indicate an exceedance of the annual mean LBC limit of 38 $\mu g/m^3$ | | | | | | | |

4.11 Monitored $NO_2$ concentrations have been below the annual mean LBC limit of 38 $\mu g/m^3$ at all monitoring sites in the vicinity of the Site since 2020. During 2018 and 2019, the limit was exceeded at several sites. However, concentrations show an overall downward trend in concentrations with the limit being met at these locations over the last four years.

4.12 Short-term $NO_2$ cannot be recorded by diffusion tubes. However, the LAQM.TG(22) guidance indicates that where the annual mean is below 60 µg/m³, it can be assumed that exceedances of the 1-hour objective for $NO_2$ are unlikely to occur. Based on the data provided in Table 4-1, it is unlikely that the short-term $NO_2$ objective is being exceeded at any of the monitoring locations.

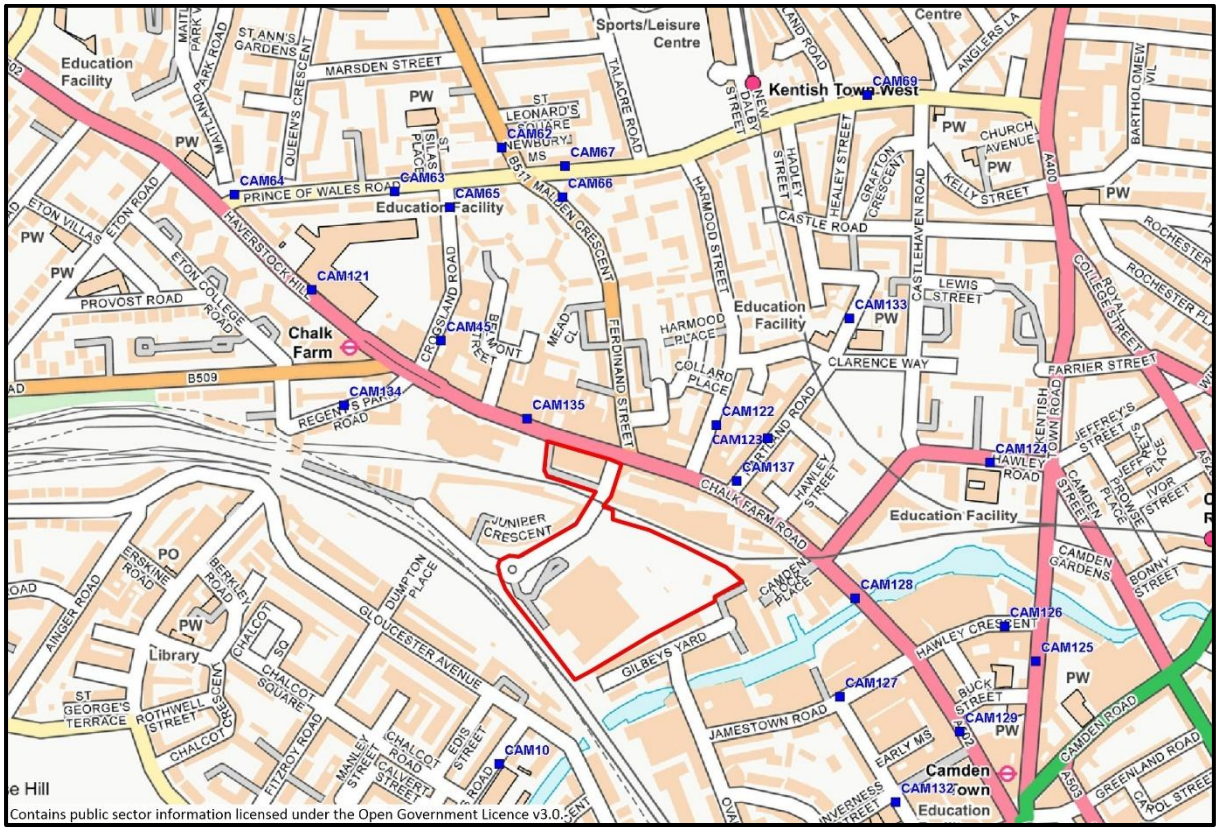


**Figure 4-1: Location of Local $NO_2$ Monitoring Sites**

4.13 LBC also monitor $PM_{10}$ and $PM_{2.5}$ concentrations at 4 of the automatic monitoring sites. The nearest to the Site are at Swiss Cottage, Finchley Road, approximately 3.1 km to the west and Euston Road, approximately 3.2 km to the south-east. The results of the monitoring are presented in Table 4-2

4.14 Annual mean concentrations of $PM_{10}$ were below the WHO limit at both roadside monitoring locations in 2023. The limit was exceeded at both sites during 2018 and 2022 and at Euston Road during 2019.

4.15 The data indicates a slight decreasing trend in concentrations.

4.16 Short-term $PM_{10}$ concentrations have met the 24-hour objective limit at both monitoring sites since 2018. Although exceedances of the 50 µg/m$^3$ limit have been exceeded at both locations, this has occurred on less than 35 occasions during each annual period.

4.17 Annual mean $PM_{2.5}$ concentrations met the WHO limit at Swiss Cottage in 2023 and were just below the limit at Euston Road in this same year. Prior to 2023 the WHO limit has been exceeded at Euston Road and Swiss Cottage since 2018, however the data shows a slight decreasing trend in concentrations resulting in the limit being met by 2023 at both locations.

**Table 4-2: Local Monitoring – $PM_{10}$ and $PM_{2.5}$**

| Site | Monitor Type | Monitored PM10 Concentration | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 |
| **Annual Mean PM10 (µg/m$^3$)** | | | | | | | |
| CD1 – Swiss Cottage | Kerbside | 21 | 19 | 16 | 16 | 21 | 18 |
| CD9 – Euston Road | Roadside | 21 | 22 | 18 | 19 | 21 | 18 |
| **PM10 No. of Days >50µg/m$^3$** | | | | | | | |
| CD1 – Swiss Cottage | Kerbside | 4 | 8 | 3 | 0 | 0 | 2 |
| CD9 – Euston Road | Roadside | 2 | 8 | 2 | 2 | 6 | 4 |
| **Annual Mean PM2.5 (µg/m$^3$)** | | | | | | | |
| CD1 – Swiss Cottage | Kerbside | 11 | 11 | 10 | 9 | 12 | 10 |
| CD9 – Euston Road | Roadside | 15 | 14 | 11 | 11 | 12 | 9 |

**Background Pollution Concentrations**

4.18 Predicted background concentrations for 2025 have been obtained from the Defra national background maps (DEFRA, 2024).

4.19 The Application Site is in grid square NGR: 528500, 184500. Data for this location was downloaded from the Defra website for the purpose of this assessment. The Defra data has been compared to local background monitoring sites across the borough.

4.20 The Defra data is higher than data recorded at the background sites within the district and therefore has been used within the assessment to ensure a cautious assessment of local background concentrations.

4.21 The Defra data is set out in Table 4-3 for the 2025 base year.

**Table 4-3: Background Pollution Concentrations**

| Location | 2025 Predicted Background Concentration (µg/m³) | | |
|---|---|---|---|
| | NO2 | PM10 | PM2.5 |
| 528500, 183500 | 20.2 | 16.4 | 8.9 |

4.22 As shown in Table 4-3, predicted background $NO_2$, $PM_{10}$ and $PM_{2.5}$ concentrations are below the WHO limits at the Site.

# 5 Predicted Impacts

**Operation Phase**

Site Suitability

5.1 $NO_2$, $PM_{10}$ and $PM_{2.5}$ concentrations across the Site were predicted using detailed modelling techniques as part of the 2017 ES and updated within the December 2020 S73 Application Air Quality Assessment Addendum (ACE Reference 196121-02A). This section considers any changes compared to the December 2020 Consented Scheme because that application considered the Main Site and set out an updated baseline assessment compared to the 2017 ES. The March 2023 Consented Scheme considered changes to the PFS site and did not set out any updates baseline assessment.

5.2 Both assessments concluded that $NO_2$, $PM_{10}$ and $PM_{2.5}$ were meeting the UK Air Quality Objectives across the Site and therefore the Site was suitable for development as proposed.

5.3 Further consideration of the predicted results and locally monitored (current baseline conditions) against the new LBC limits for each pollutant (Table 2-1) is set out below.

*Nitrogen Dioxide*

5.4 Predicted annual mean $NO_2$ concentrations set out in the 2017 ES and December 2020 S73 Application Addendum Report were below the LBC limit of 38 µg/$m^3$ across the Site, indicating the Site is suitable for development as proposed in terms of exposure to $NO_2$.

5.5 Monitoring data set out in Table 4-1 shows an overall downward trend in $NO_2$ since 2018. On this basis, the results of the modelling set out in the 2017 ES and December 2020 S73 Addendum Report are considered to represent a worst-case prediction of concentrations across the Site, with the model results predicted in the assessments verified against monitored concentrations in 2016 and 2018, respectively.

5.6 Current baseline monitoring data, as set out in Table 4-1, show annual mean $NO_2$ concentrations recorded at roadside locations along Chalk Farm Road between 21 and 32 µg/$m^3$ during 2023.

5.7 Pollution concentrations are known to decline rapidly away from source. Chalk Farm Road is the main source of traffic related emissions influencing air quality within the Main Site, which is separated from the road by approximately 70m.

5.8 $NO_2$ concentrations within the Main Site of the Site will therefore be lower than recorded on Chalk Farm Road i.e. less than 21 µg/m$^3$.

5.9 $NO_2$ concentrations across the Main Site are therefore meeting the LBC annual mean and 1-hour limit values based on current baseline monitoring and the Site is considered suitable for development as proposed in respect of this pollutant, confirming that the outcome of the 2017 ES remains valid.

*Particulate Matter ($PM_{10}$)*

5.10 The 2017 ES predicted annual mean $PM_{10}$ concentrations across the Main Site of 20.9 – 21.2 µg/m$^3$, above the WHO limit of 20 µg/m$^3$. This was based on a 2016 baseline.

5.11 Updated modelling set out within the December 2020 S73 Application Addendum Report predicted annual mean $PM_{10}$ concentrations across the Main Site of 15.9 – 18.3 µg/m$^3$. Below the WHO limit. This was based on a 2018 baseline.

5.12 As detailed previously, the modelling undertaken for both assessments is considered worst-case due to the historic baseline data used and local monitoring showing a slight decline since 2018 (Table 4-2).

5.13 Monitoring during 2023 recorded concentrations below the annual mean WHO limit during 2023 at both Swiss Cottage and Euston Road. Again, both these sites are at road site locations and concentrations across the Main Site would be lower than recorded at these two locations given its separation distance from the main road network. On this basis $PM_{10}$ concentrations across the Main Site are concluded as currently meeting the WHO limits, and the Site is considered suitable for development as proposed in respect of this pollutant, confirming that the outcome of the 2017 ES remains valid.

*Particulate Matter ($PM_{2.5}$)*

5.14 $PM_{2.5}$ was not considered within the 2017 ES.

5.15 Within the December 2020 S73 Application Addendum Report annual mean $PM_{2.5}$ concentrations of 9.5 – 10 µg/$m^3$ were predicted across the Main Site at locations of relevant exposure, with the report concluding that the UK AQO was being met and therefore the Site was suitable for development as proposed.

5.16 Concentrations predicted within the December 2020 S73 Application Addendum Report meet the WHO limit of 10 µg/$m^3$ across the Main Site.

5.17 Current monitored concentrations, as set out in Table 4-2, indicate that the WHO limit is being met at roadside locations in the borough. Based on the separation distance between the Main Site and the nearest main road (Chalk Farm Road), it is expected that concentrations across the Main Site would be lower than recorded at Swiss Cottage and Euston Road, concluding concentrations below the WHO limit.

5.18 Based on the above review the Site is considered suitable for development as proposed in respect of $PM_{2.5}$ and the outcome of the 2017 ES remains valid.

**Air Quality Neutral**

5.19 Air quality neutral calculations have been carried out following the methodology set out in the 'London Plan Guidance; Air Quality Neutral' 2023.

Building Emissions

5.20 The proposed long-term energy strategy will comprise an all-electric strategy, consisting of ASHPs and PV and will therefore not have any associated on-site building emissions.

5.21 Based on the above, the February 2025 Amended Proposed Development will be better than 'air quality neutral' in terms of building emissions.

Transport Emissions

5.22 The air quality neutral calculation and comparison of transport emissions and transport emissions benchmarks (TEBs) for the February 2025 Amended Proposed Development are described below.

5.23 The calculation is based on trips associated with the residential element of the Proposed Development only, due to traffic associated with other land types being considered as operational trips and therefore excluded from the air quality neutral assessment based on the GLA guidance.

**Table 5-1: Proposed Development TEBs**

| Land Use | No. Dwellings or GIA ($m^2$) | Standard Benchmark Trip Rate (trips / dwelling or GIA ($m^2$) / annum) | TEB (trips / annum) |
|---|---|---|---|
| Residential | 637 dwellings | 114 | 72,618 |

**Table 5-2: Proposed Development Trip Rates**

| Land Use | Development Trip Rate (trips / annum) |
|---|---|
| Residential | 25,550 |

**Table 5-3: Comparison of Proposed Development Trip Rates and TEBs**

| Land Use | Total TEB (trips / annum) | Development Trip Rate (trip rate) | Comparison (trips / annum) |
|---|---|---|---|
| Residential | 72,618 | 25,550 | -47,068 |

5.24 The proposed development trip rate is below the calculated total TEB, as indicated in Table 5-3. Therefore, the February 2025 Proposed Amended Development is better than 'air quality neutral' in terms of transport emissions.

# 6 Mitigation

**Construction Phase**

6.1 The outcome of the 2017 ES remains valid and therefore there are no changes in the recommended mitigation measures set out within Chapter 8 of the ES to be implemented within the CMP to mitigate against construction related emissions.

**Operation Phase**

6.2 The impact of the February 2025 Amended Proposed Development on local air quality is concluded as negligible and no further mitigation of potential impacts is required.

6.3 The baseline assessment has shown that air quality at the Site is meeting the relevant air quality limits set by LBC and therefore is suitable for development as proposed. No mitigation in terms of exposure is required.

6.4 The February 2025 Amended Proposed Development has been shown to be more than Air Quality Neutral in terms of building and transport emissions and no additional mitigation or off-setting cost is necessary.

# 7 Conclusions

7.1 The potential air quality impacts associated with the February 2025 Amended Proposed Development at Camden Goods Yard have been assessed.

7.2 The Site is located within the LBC AQMA but outside the Chalk Farm Road Air Quality Focus Area.

7.3 Updated guidance on the assessment of emissions during demolition and construction was published by the IAQM in January 2024. The guidance does not change the outcome of the assessment set out in the 2017 ES and the best practice measures set out in Chapter 8 of the ES for inclusion with the CMP remain valid.

7.4 The February 2025 Amended Proposed Development will not result in a change in trip generation from the Site compared to that assessed within the 2017 ES and therefore operational impacts on local air quality remain as negligible and the outcome of the 2017 ES remains valid.

7.5 LBC have set updated air quality limits based on the WHO guideline limits for consideration of air quality across the borough. The baseline assessment has concluded that concentrations of $NO_2$, $PM_{10}$ and $PM_{2.5}$ across the Site are meeting the relevant limits set by LBC and the Site is therefore suitable for development as proposed.

7.6 The February 2025 Amended Proposed Development is air quality neutral.

7.7 Overall, it is concluded that there are no air quality constraints to the February 2025 Amended Proposed Development which is in accordance with local, regional, and national policy and guidance. There are no new or altered impacts related to the February 2025 Amended Proposed Development and the conclusions of the 2017 ES remain valid.