CAMDEN GOODS YARD

Air Quality Positive Statement

March 2025

ARDENT
CONSULTING ENGINEERS
AN EMPLOYEE OWNED COMPANY

ST GEORGE WEST LONDON LIMITED

CAMDEN GOODS YARD, CHALK FARM, CAMDEN

FEBRUARY 2025 SECTION 73 APPLICATION AIR QUALITY POSITIVE STATEMENT

REPORT REF.

2105801 – R06

March 2025

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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 meet the requirements of the Greater London Authority (GLA) Air Quality Positive Policies in relation to the February 2025 Proposed Amended Development to vary the extant planning permission for the Camden Goods Yard project. The Planning Statement provides the full description of the development.

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 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.

Scope

1.3 This AQPS identifies the air quality constraints and opportunities associated with the Site and details the ways in which the February 2025 Proposed Amended Development has followed an 'air quality positive' approach in order to maximise the benefits to local air quality in and around the Site and minimise exposure to any existing sources of poor air quality. The air quality pollutants of concern considered by this AQPS are nitrogen dioxide (NO_2) and particulate matter (PM_{10} and $PM_{2.5}$).

1.4 An Air Quality Assessment (AQA) has also been undertaken as part of the Environmental Impact Assessment (EIA) for the February 2025 Proposed Amended Development.

1.5 This is set out in Chapter 8 of the submitted 2017 Environmental Statement (ES) of approved planning consent 2017/3847/P and associated Air Quality Technical Report (ACE Report Reference 160630-13A). Further updated assessment relating specifically to the February 2025 Proposed Amended Development, as discussed in section 1.2, is set out in the Air Quality Addendum Report (ACE Report Reference 2105801-R07) and the air quality addendum report completed for the December 2020 consented S73 Application (ACE Report Reference 196121-02).

1.6 This AQPS has been developed considering relevant local and national guidance, policy, and legislation.

Overview if Applicable Legislation, Policy, and Guidance

1.7 The following legislation, policy and guidance have been considered by this AQPS (see Appendix B for further details):

- National air quality legislation and strategies:
    - The Environment Act 2021 (UK Government, 2021)
    - The Air Quality Strategy (Defra, 2023);
    - Part IV of the Environment Act (UK Government, 1995);
    - The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 (UK Government, 2023);
    - Air Quality Standards Regulation (Statutory Instrument, 2010, No 1001);
    - Air Quality Standards (Amendment) Regulations (Statutory Instrument, 2016 No. 1184);
    - National Air Quality Plan (Defra and DfT, 2017).
- Planning Policy:
    - National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2024);
    - Air Quality Planning Practice Guidance (PPG) (Ministry of Housing, Communities and Local Government, 2019);
    - The London Plan (Mayor of London, 2021a);
    - London Environmental Strategy (Mayor of London, 2018);
    - Camden Local Plan 2017 (LBC, 2017);

- Camden Air Quality Planning Guidance (LBC, 2021).

- Guidance:
  - Local Air Quality Management (LAQM) Technical Guidance (LAQM.TG(22)) (Defra, 2016);
  - London Local Air Quality Management (LLAQM) Technical Guidance (LLAQM.TG(19)) (Mayor of London, 2016)***;***
  - Greater London Authority (GLA) '*Air Quality Positive*' guidance (GLA, 2023); and
  - Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) guidance on '*Land-use Planning and Development Control: Planning for Air Quality*' (EPUK & IAQM, 2017).

Applicable Air Quality Objective/Limits

1.8 A summary of the relevant national air quality objectives (NAQOs) that have been considered as part of this AQPS are set out in Table 1-1. London Borough of Camden (LBC) have adopted more stringent limit values based on the World Health Organisation (WHO) air quality guidelines. These are discussed within the Camden air quality planning guidance and are also set out in Table 1-1. he locations where the air quality objectives and limits apply are summarised in Table 1-2, as detailed in LLAQM.TG(19). Further discussion of the NAQOs and LBC limit values are provided in Table 1-2.

Table 1-1: UK Air Quality Objectives and LBC Air Quality limits

Pollutant	Air Quality Objective/Limits	
	Concentration (µg/m^3)	Averaging Period
National Air Quality Objectives		
NO_2	40	Annual Mean
	200	1-hour mean, not to be exceeded on more than 18 occasions per annum
PM_{10}	40	Annual mean
	50	24-hour mean, not to be exceeded on more than 35 occasions per annum

Pollutant	Air Quality Objective/Limits	
	Concentration (µg/m³)	Averaging Period
$PM_{2.5}$	10	Annual Mean
LBC Air Quality Limits (based on WHO Guidelines)		
NO_2	38 (the 40 µg/m³ 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

Table 1-2: Locations Where Objectives/Limits Apply (Relevant Exposure)

Averaging Period	Relevant Locations	NAQOs Should Apply	NAQOs don't usually apply
Annual Mean	Where individuals are exposed for a cumulative period of 6 month in a year	Facades of residential properties, schools, hospitals, and gardens of residences	Facades of offices, hotels and shops or kerbside sites
24-hour mean	Where individuals are expected to be exposed for 24-hours or longer	As above, with the addition of hotels	Kerbside sites and areas where the public are unlikely to spend significant time
1-hour mean	Where individuals are expected to spend one hour or longer	As above, with the addition of parts of car parks, bus stations, railway stations etc. which are not fully enclosed, and any outdoor locations where members of the public might reasonably be expected to spend one hour or longer	Locations not publicly accessible or where occupation is not regular

Method Statement

AQPS Methodology

1.9 Policy SI1 'Improving Air Quality' of the London Plan (Mayor of London, 2021a) states that "*…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…*". As such, this AQPS has been prepared in accordance with the requirements of the Air Quality Positive guidance published by the GLA in February 2023 (see Appendix B for further details). This guidance requires that an AQPS demonstrate "*…how benefits to local air quality have been maximised, and how measures to minimise pollution exposure will be implemented".*

1.10 Existing constraints and opportunities associated with the Site have been identified. Factors taken into consideration when identifying constraints and opportunities include, but are not limited to, consideration of existing and proposed areas that are sensitive to the relevant pollutant NAQOs/limits (see Table 1-1 and Table 1-2), the existing and proposed emissions sources within the Site and in the surrounding area, the design of the development and baseline air quality conditions within the Site and the surrounding area[1]. Additionally, a number of technical studies have been undertaken, which also inform the identification of constraints and opportunities (see Paragraphs 1.12 to 1.8 for details of the methodologies of these studies).

1.11 Taking into consideration the identified constraints and opportunities, measures to provide an 'air quality positive' approach have been proposed. Details have also been provided to justify the selection of measures (with reference being made to the outcome of the technical studies undertaken, as appropriate), including how these measures will be implemented and monitored (as applicable). The mitigation measures considered fall under the following four themes:

- Better design and reducing exposure;
- Building emissions;

[1] The methodology for determining baseline conditions is as described in 2017 ES Chapter 8, the AQAR completed for the 2020 July S73 Application and the AQAR completed for the 2025 S73 Application.

- Transport emissions; and
- Innovation and futureproofing.

Technical Study Methodologies

Initial Air Quality Site Suitability Assessment

1.12 An initial Site suitability study was undertaken by ACE in September 2017 as part of the EIA (ACE, 2017) and set out within the 2017 ES in order to provide information as to the suitability of the Site for its intended end-use. The assessment included a desktop review of baseline air quality conditions within the Site area and in the local area based on publicly available data, as well as the undertaking of atmospheric dispersion modelling to predict baseline[2] concentrations of NO_2, PM_{10} and $PM_{2.5}$ within the Site.

1.13 The assessment was undertaken in accordance with relevant guidance documents available at the time, including LAQM.TG(16) (Defra, 2016) and LLAQM 16 guidance (Mayor of London, 2016). The full methodology for the atmospheric dispersion modelling assessment is presented within the ACE AQA. Although updated guidance has since been published (LAQM.TG(22) (Defra, 2022) and LLAQM 19 (Mayor of London, 2019)), the modelling guidance within both updated documents remains relatively unchanged since the previous guidance and therefore the approach used for the modelling remains valid.

1.14 Updated desktop review of local monitoring data and atmospheric dispersion modelling was undertaken as part of the December 2020 consented S73 AQAR to predict baseline[3] concentrations of pollutants at the Site. This modelling used the most up to date guidance documents available at the time.

1.15 A further updated desktop review of local monitoring data has been undertaken for the February 2025 Proposed Amended Development AQAR. This report has considered baseline concentrations during 2023, using the most recently available

[2] The baseline years for the purposes of the Air Quality Site Suitability assessment was taken to be 2016 as this was the most recent year for which representative local monitoring data were available at the time of undertaking the assessment and 2024, the anticipated first year of occupation of the completed development at that time.
[3] The baseline years for the updated assessment were taken to be 2018 as this was the most recent year for which representative local monitoring data were available and 2017, the anticipated first year of the completed development at the time.

monitoring data published by LBC assessed against the latest LBC limit values and considering the latest updated guidance such as LLAQM.TG(19).

Assessment of Operational Impacts

1.16 Atmospheric dispersion modelling was used to assess changes in concentrations and impacts due to the development at both existing and proposed sensitive receptor locations as part of the 2017 ES and the December 2020 consented S73 AQAR. Although an air quality technical note (ACE Report Reference 2105800-04E) was undertaken as part of the March 2023 Consented Scheme Application, this related specifically to the PFS Site parcel and no updated dispersion modelling was undertaken. This Technical Note is not therefore relevant to this assessment.

1.17 These assessments were undertaken in accordance with relevant guidance documents available at that time, including the EPUK & IAQM guidance (EPUK & IAQM, 2017). The full methodology and outcomes of the atmospheric dispersion modelling assessment are presented within 2017 ES Chapter 8 and ACE December 2020 consented S73 AQAR.

Air Quality Neutral Assessment

1.18 Consideration of the 'air quality neutrality' of the February 2025 Proposed Amended Development, in terms of both transport and building emissions, has been undertaken in accordance with the GLA's guidance on '*Air Quality Neutral*' (GLA, 2023). Full details of the 'air quality neutral' assessment is presented within the February 2025 S73 AQAR.

2 Constraints and Opportunities

Site & Study Area

2.1 The Site consists of two adjoining parcels of land spatially separated by an elevated railway line.

2.2 The northern parcel of the Site (the PFS Site) is now occupied by the completed Phase 1a development, the Morrisons Temporary Store, which opened in February 2021, replacing the former petrol filling station. This part of the site lies immediately south of Chalk Farm Road with the railway line forming the southern boundary. This parcel of land does not form part of the February 2025 Proposed Amended Development being considered within this AQPS.

2.3 The southern parcel of the Site (the Main Site) is located approximately 70 to the southwest of Chalk Farm Road, with the railway line running along the northeast and southwest boundaries. The Site is under construction with demolition of the Morrison Store completed, the basement completed and Blocks A and B due for completion in 2025 and 2026, respectively. The area of the site which forms the February 2025 Proposed Amended Development lies within the southeast area of the Main Site.

Baseline Air Quality Conditions

Collation of Publicly Available Information

2.4 The most recent desk-based study of baseline air quality conditions within the Site and in the surrounding area has been undertaken as part of February 2025 S73 AQAR. Information regarding baseline air quality has been obtained by:

- Collating the results of monitoring carried out by LBC.
- Referring to maps of Air Quality Management Area (AQMAs) and Air Quality Focus Areas (AQFAs);
- Identifying any exceedances of the EU Limit Values that are predicted by the Department for Environment, Food and Rural Affairs' (Defra's) Pollution Climate Mapping (PCM) model (Defra, 2020a) or measured by Automatic Urban and Rural Network (AURN) monitoring; and

- Considering predicted background concentrations (defined based on the national pollution maps published by Defra (Defra, 2024)).

EU Limit Values and Clean Air Zones

2.5 The Site is located within the 'Greater London Area' which has been reported as exceeding the annual mean NO_2 Limit Value. This area is identified within Defra and the DfT's National Air Quality Plan (Defra and DfT, 2017) as requiring a Clean Air Zone (CAZ). Two charging CAZs have been implemented in Greater London; the Low Emission Zone (LEZ) and the Ultra-Low Emission Zone (ULEZ). Both

2.6 The Site is located within the LEZ and ULEZ which currently charges Heavy Goods Vehicles (HGVs) and lorries, Light Goods Vehicles (LGVs), buses / minibuses and diesel cars that do not meet Euro 6 (nitrogen dioxide (NO_x) and particulate matter (PM)) standards, and petrol cars, vans, minibuses and other specialist vehicles that do not meet Euro 4 PM standards. Motorcycles etc must meet the Auro 3 standards.

2.7 There are no AURN monitoring sites located near the Site and, therefore, no nearby exceedances of the EU Limit Values have been measured.

2.8 Defra's PCM model does not predict any exceedances of the NO_2 annual mean EU Limit Value on roads near the Sites in 2023. No exceedances of the PM_{10} or $PM_{2.5}$ EU Limit Values were predicted on roads near the Site in 2020, 2025 or 2030[4].

LLAQM

2.9 LBC has assessed air quality within its area as part of its responsibilities under LLAQM. A whole-borough AQMA, was declared in 2002 because of exceedances of the annual mean NO_2 NAQO and the 24-hour mean PM_{10} NAQO. The Site is located within this AQMA.

[4] 2021 and 2026 data are not available for PM, and so data for 2020 and 2025 have been considered instead.

AQFAs

2.10 The GLA has declared 187 AQFAs within Greater London. AQFAs are locations that exceed the annual mean NO_2 Limit Value as well as being locations with high levels of human exposure to NO_2. The closest AQFA incorporates Chalk Farm Road to the south of Ferdinand Street, Camden High Street and Camden Road. The Site does not fall within the AQFA, being approximately 50m to the southwest. The location of the AQFA is shown in Figure 2-1.

Local Monitoring

2.11 A review of LBC monitoring data was undertaken for the 2017 ES and 2020 December consented S73 AQAR which conclude that concentrations of all three pollutants would meet the relevant NAQOs within the relevant assessment years of 2016 and 2018.

2.12 An updated review of local monitoring was undertaken for the February 2025 S73 AQAR, a summary of which is provided below.

2.13 LBC currently carried out NO_2 monitoring extensively across the borough using five automatic and 329 diffusion tube monitoring sites. The closest and most representative locations to the Site are identified in Figure 2-1**.**

2.14 No exceedances of the annual mean NO_2 NAQO or LBC limit value were measured at any considered monitoring site in 2023. Exceedances of the annual mean NO_2 LBC limit were measured at several monitoring sites during 2018 and 2019, however due to a downward trend in concentrations the LBC limit value of 38 $\mu g/m^3$ and the NAQO of 40 $\mu g/m^3$ were met at all sites from 2019 onwards.

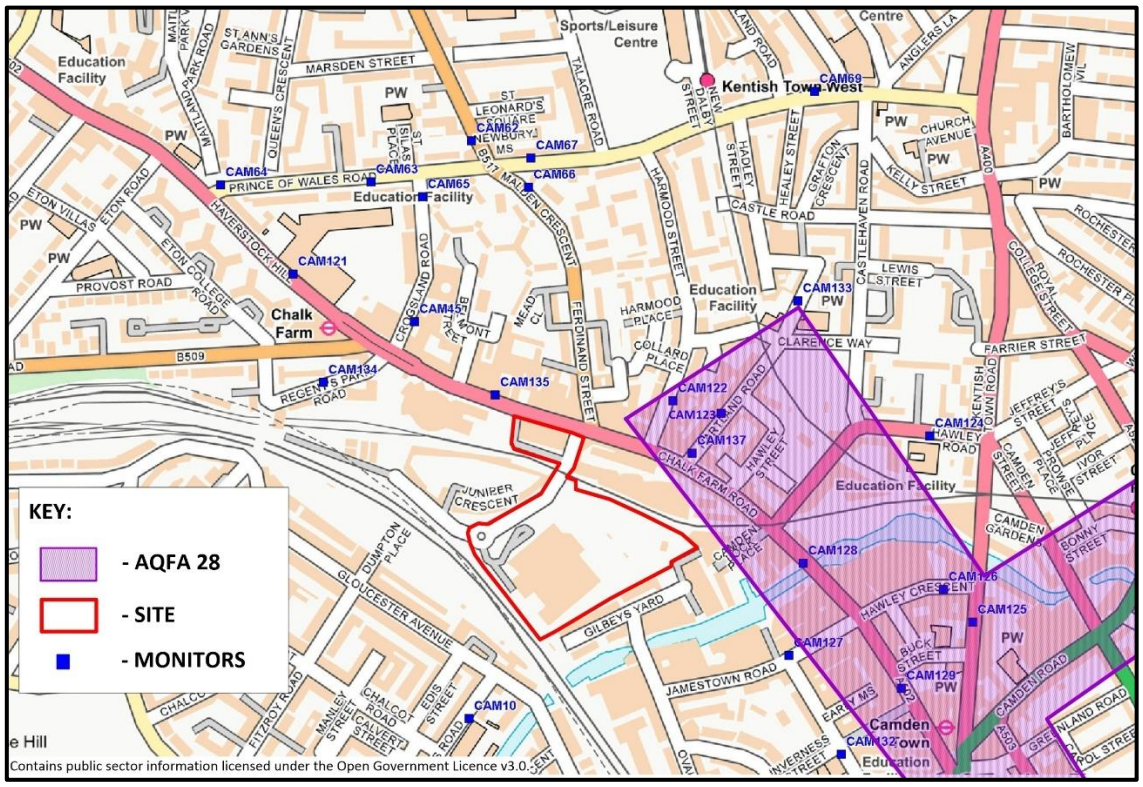
2.15 Short-term NO_2 cannot be recorded by diffusion tubes. However, the LAQM.TG(22) guidance indicates that where the annual mean is below 60 $\mu g/m^3$, it can be assumed that exceedances of the 1-hour objective for NO_2 are unlikely to occur. Based on the measured annual mean concentrations it is unlikely that the short-term NO_2 NAQO is being exceeded at any of the monitoring locations.

2.16 LBC also measured PM_{10} and $PM_{2.5}$ concentrations at four automatic monitoring sites. The two nearest are at Swiss Cottage, Finchley Road, approximately 3.1 km to the west and Euston Road, approximately 3.2 km to the south-east.

2.17 Measured annual mean PM_{10} and $PM_{2.5}$ concentrations were below the relevant NAQOs and LBC limit values during 2023. Furthermore, no exceedances of the 24-hour mean NAQO for PM_{10} have been measured at either monitoring site since 2018.

2.18 The above baseline data review concludes that NO_2, PM_{10} and $PM_{2.5}$ are meeting the NAQOs and LBC limits at the Site and the Site is suitable for the February 2025 Proposed Amended Development without the need for further mitigation.

Figure 2-1: Location of Monitoring and AQFA



Air Quality Modelling Assessments

2.19 Air quality dispersion modelling was undertaken by ACE to predict concentrations of NO_2, PM_{10} and $PM_{2.5}$ within the Site, a part of the 2017 ES and December 2020 consented S73 AQAR. Further details of the modelling results are set out in Chapter 8 2017 ES and the ACE AQAR for the 2020 December consented S73 application.

2.20 Predicted NO_2, PM_{10} and $PM_{2.5}$ concentrations were below the annual mean NAQOs throughout the Site. As such, it was judged that the entire Site is suitable for sensitive land-uses such as residential uses without the need for further mitigation. The conclusions of these assessments have been confirmed as valid based on the outcome of the February 2025 Proposed Amended Development AQAR.

Air Quality Neutral Assessment

2.21 The February 2025 Proposed Amended Development has been found to be better than 'air quality neutral' in terms of both building and transport emissions and no mitigation of emissions was required.

Identification of Sensitive Locations

2.22 The February 2025 Proposed Amended Development will introduce the following new sensitive receptors:

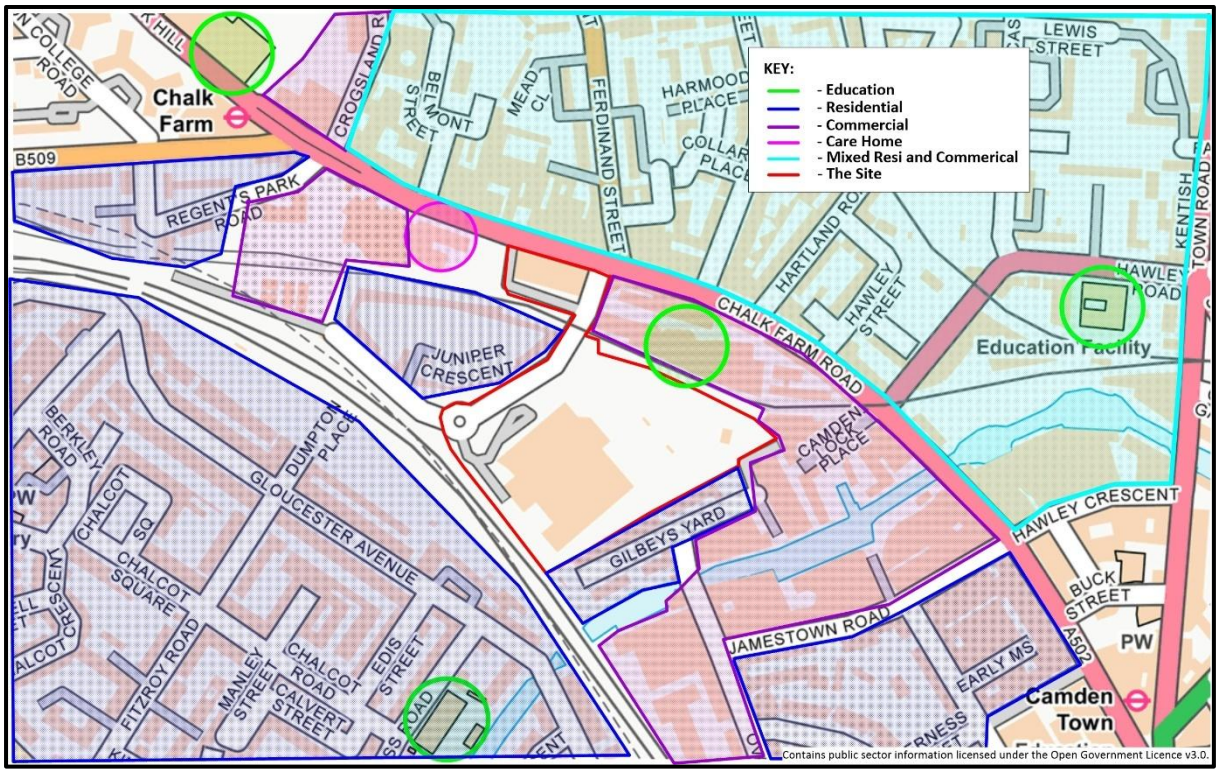
- Main Site:
    - Residential land use - high sensitivity to concentrations of NO_2 (long-term and short-term exposure), PM_{10} (long-term and short-term exposure) and $PM_{2.5}$ (long-term exposure), and human health effects and loss of amenity because of construction dust;
    - Publicly accessible outdoor space – high sensitivity to concentrations of NO_2 (1-hour mean objective);
    - Mixed-use local centre (to include retail employment and community space) - high sensitivity to concentrations of NO_2 (1-hour mean objective), and medium sensitivity to human health effects and loss of amenity because of construction dust.

2.23 Existing sensitive locations in the local area include (see Figure 2-2):

- Residences - high sensitivity to concentrations of NO_2 (annual mean and 1-hour mean objectives), PM_{10} (annual mean and 24-hour mean objectives) and $PM_{2.5}$ (annual mean objective) and human health effects and loss of amenity because of construction dust;

- Schools - high sensitivity to concentrations of NO_2 (annual mean and 1-hour mean objectives), PM_{10} (annual mean and 24-hour mean objectives) and $PM_{2.5}$ (annual mean objective) and human health effects and loss of amenity because of construction dust;
- Care homes - high sensitivity to concentrations of NO_2 (annual mean and 1-hour mean objectives), PM_{10} (annual mean and 24-hour mean objectives) and $PM_{2.5}$ (annual mean objective) and human health effects and loss of amenity because of construction dust;
- Commercial properties - high sensitivity to concentrations of NO_2 (1-hour mean objective), and medium sensitivity to human health effects and loss of amenity because of construction dust; and

Figure 2-2: Overview of Existing Sensitive Locations



Overview of Constraints & Opportunities

Constraints

2.24 The following constraints have been identified within the Site and in the surrounding area:

- There are multiple proposed and existing locations that are sensitive to air quality impacts (see Paragraphs 2.21 to 2.22 and Figure 2-2); the February 2025 Proposed Amended Development should not significantly worsen air quality and / or result in unacceptable air quality at these locations;
- The Site is located within or near the following areas, which have been designated for air quality reasons:
  - Within the Greater London LEZ and the expanded ULEZ;
  - Within the Camden AQMA (declared because of exceedances of the annual mean NO_2 objective and the 24-hour mean PM_{10} objective);
  - Close to the AQFA 28 incorporating part of Chalk Farm Road, Camden High Street and Camden Road (see Figure 2-1).
- There are existing sources of emissions (i.e. local roads) located near the Site, namely Chalk Farm Road.
- There will be a necessity for the Site to consume energy; this has the potential to result in emissions associated with the development;
- There will be a necessity for construction vehicles to travel to and from the Site during the construction phase; this has the potential to result in emissions associated with transport on the local road network; and
- There will be a necessity for new residents and users of Site to travel to and from the Site; this has the potential to result in emissions associated with transport.

Opportunities

2.25 The following opportunities have been identified within the Site and in the surrounding area:

- Design:
  - Land uses:
    - Select appropriate land-uses for the Site. This may be informed by technical studies;
    - Select appropriate Site location for identified preferred land uses. This may be informed by technical studies;
    - Choose appropriate locations for various proposed land uses, taking into consideration the proximity of nearby sources and the sensitivity of the land uses in question. This may be informed by technical studies;
  - Buildings:
    - Consideration as to how the building layout may change any existing street canyons;
  - Public and green spaces:
    - Use landscaping and green buffers to create barriers between emissions sources and sensitive receptors;
  - Transport and connectivity:
    - Increase connectivity and access for active and sustainable transport options;
    - Promote active travel and use of public transport;
- Building Emissions:
  - An energy strategy with zero on-site emissions;
  - Should on-site combustion be included, then this should be located appropriately, taking into consideration nearby sensitive land uses;
  - Development proposals that are better than 'air quality neutral' in terms of building emissions;

- Transport emissions:
  - Discourage private vehicle use, and encourage active transport and public transport;
  - Encourage uptake of Ultra Low Emission Vehicle (ULEV) technology (e.g. through provision of EV infrastructure);
- Innovation and futureproofing:
  - Consideration of how air quality is predicted to change in the future should be considered (e.g. through appropriate technical studies);
  - Provision of infrastructure to support ULEVs. This compliments the planned move towards lower emission vehicles throughout the UK; and
  - The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 (UK Government, 2023) sets out new, more stringent, concentration and exposure reduction targets for $PM_{2.5}$, to be achieved by 2040 (see Appendix B). While these future targets are not applicable until 2040, any measures taken to improve or minimise exposure to concentrations of air pollutants (in particular $PM_{2.5}$ concentrations) are likely to contribute to compliance by 2040. It is noted that LBCs current air quality limit is 10 $\mu g/m^3$, which is equivalent to the new 2040 annual mean target set within the regulations.

3 Measures to Achieve Air Quality Positive

Overview of Measures Proposed

3.1 An overview of proposed measures which will contribute to an 'air quality positive' approach is presented in Table 3-1.

Table 3-1: Air Quality Positive Matrix

Measure	Summary of the Measure	Reason for Undertaking Measure	Expected Benefit	Assessment and Reporting (Qualitative or Quantitative)	How will this Measure be Secured
Better Design and Reducing Exposure					
Active Travel Provision	The Site will provide 90 short stay and 1,195 long stay cycle parking spaces Secure cycle storage will be provided	Promote active travel as an alternative to private vehicle use.	Increased active travel and decreased private vehicle use and associated private vehicle emissions to minimise exposure to poor air quality.	The cycle parking at the February 2025 Proposed Amended Development will be regularly monitored.	Proposed design to be secured through the planning application
Land Use Layout	The most sensitive proposed locations (i.e. residences) are located within the Main Site, separated from the main road network (i.e. Chalk Farm Road), by 70m. Residential uses are located above ground floor level where pollution levels are lower in Block C, the closest block to the road network. The rest of the Site where residential are at ground level are separated from the main road network by Block C and B.	Located more sensitive land uses in areas with better air quality, to minimise exposure.	Minimise exposure of new users / residents of the scheme to poor air quality.	The 2017 ES included modelling to inform the appropriateness of land use layout and the need for any mitigation measures. Subsequent assessments have confirmed the site suitability. (Quantitative)	Proposed design to be secured through the planning application
	Sensitive proposed land-uses are situated in locations where the relevant air quality assessments indicate that air quality is good (i.e. pollutant concentrations are below the relevant NAQOs).	Located more sensitive land uses in areas with better air quality, to minimise exposure.	Minimise exposure of new users / residents of the scheme to poor air quality	The 2017 ES included modelling to inform the appropriateness of land use layout and the need for any mitigation measures. Subsequent	Proposed design to be secured through the planning application

Measure	Summary of the Measure	Reason for Undertaking Measure	Expected Benefit	Assessment and Reporting (Qualitative or Quantitative)	How will this Measure be Secured
				assessments have confirmed the site suitability. (Quantitative)	
Overall appropriateness of Site selection / proposed land-uses	Sensitive proposed land-uses are situated in locations where modelling studies undertaken by ACE indicate that air quality is acceptable or good (and which are, therefore, appropriate for the intended land uses).	Ensure that introduced land uses experience appropriate air quality.	Minimise exposure of new users / residents of the scheme to poor air quality.	The 2017 ES included modelling to inform the appropriateness of land use layout and the need for any mitigation measures. Subsequent assessments have confirmed the site suitability. (Quantitative)	Proposed design to be secured through the planning application
Landscaping	204 trees will be planted in conjunction with other landscaping and greening measures throughout the Site which will increase absorption of local pollutants from the atmosphere	Minimise exposure to road emissions	Minimise exposure to road emissions	n/a	Proposed design to be secured through the planning application
Building Emissions					
Energy Strategy	The proposed energy strategy for the February 2025 Proposed Amended Development is not anticipated to include on-site combustion. As such, there will be no on-site emissions associated with the energy strategy.	Minimise on-site emissions associated with the energy strategy.	Minimise on-site emissions.	n/a	Proposed design to be secured through the planning application
Air Quality neutral Building Emissions	The February 2025 Proposed Amended Development is better than 'air quality neutral' in terms of building emissions, as compared to the relevant benchmark for a comparable development due to an energy strategy with zero on-site emissions.	Minimise on-site emissions associated with the energy strategy.	Minimise on-site emissions. Comparative benefit as compared to a 'standard' comparable development.	Air Quality Neutral Assessment (see February 2025 S73 Air Quality Addendum Report). (Quantitative)	Proposed design to be secured through the planning application
Transport Emissions					

Measure	Summary of the Measure	Reason for Undertaking Measure	Expected Benefit	Assessment and Reporting (Qualitative or Quantitative)	How will this Measure be Secured
Travel Plan	A Travel Plan has been developed for the Site. The Travel Plan provides a long-term strategy for encouraging residents to minimise their need to travel, as well as to promote the use of modes of transport other than the private motor vehicle.	Encourage sustainable transport and discourage private vehicle use.	Reduced emissions associated with private vehicle use to minimise exposure to poor air quality.	Travel surveys will be undertaken following occupation of the Site, and the Travel Plan targets and measures reviewed and updated, as necessary. Further monitoring surveys will be undertaken at regular intervals following initial occupation. (Quantitative)	Secured as part of the Section 106 agreement
Provision of Travel Information	A Travel Information Pack (TIP) will be provided to all residents upon first occupation of the February 2025 Proposed Amended Development to promote the existence and use of alternative modes of transport to the private car.	Reduce reliance on private vehicles.	Reduction in emissions associated with private vehicles to minimise exposure to poor air quality.	n/a	Measure included within the Travel Plan (secured via Section 106)
Limited car parking provision on the site	The February 2025 Proposed Amended Development includes minimal parking provision on the Site. A total of 18 residential parking spaces and 18 blue badge spaces will be provided	Minimise the use of private vehicles by site users and encourage use of alternative more sustainable modes	Reduction in emissions associated with private vehicles to minimise exposure to poor air quality.	n/a	Proposed design to be secured through the planning application
Provision of Car Club spaces on the site	A total of 2 car club spaces will be provided on the Site	To minimise car ownership and encourage the use of alternative modes of transport/	Reduction in emissions associated with private vehicles to minimise exposure to poor air quality.	n/a	Proposed design to be secured through the planning application
Air quality neutral transport emissions	The February 2025 Proposed Amended Development is better than 'air quality neutral' in terms of transport	Minimise operational traffic and	Minimise traffic related emissions.	Air Quality Neutral Assessment (see February 2025	Proposed design to be secured through the

Measure	Summary of the Measure	Reason for Undertaking Measure	Expected Benefit	Assessment and Reporting (Qualitative or Quantitative)	How will this Measure be Secured
	emissions, as compared to the relevant benchmark for a comparable development due to the limited parking provision provided on the Site	associated emissions	Comparative benefit as compared to a 'standard' comparable development.	S73 Air Quality Addendum Report). (Quantitative)	planning application
Innovation and Future Proofing					
Consideration of Future Baseline Air Quality	Consideration of how future baseline air quality may change by the time that the February 2025 Proposed Amended Development is occupied. This has been undertaken as part of 2017 ES.	Inform decisions regarding the February 2025 Proposed Amended Development design and mitigation requirements.	Inform decisions regarding the proposed design and mitigation, thus facilitating the ability to make decisions to minimise exposure and improve air quality.	A modelling study was undertaken as part of the 2017 ES Chapter 8 and the December consented 2020 S73 Application.	Considered by an Air Quality ES Chapter and addendum report (submitted as part of the planning applications)
Consideration of Future Air Quality Targets	Consideration has been given within the 2025 Air Quality Addendum Report to the LBC PM2.5 limits which are equivalent to the future, more stringent, targets for PM2.5 introduced by the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023. The assessment undertaken has shown that total concentrations and impacts currently meet the future PM2.5 target. As such, the target may also be expected to be met by the time that it comes into force in 2040.	Inform decisions regarding the February 2025 Proposed Amended Development design and mitigation requirements.	Inform decisions regarding the proposed design and mitigation, thus facilitating the ability to make decisions to minimise exposure and improve air quality.	An updated baseline air quality review undertaken as part of the 2025 air quality addendum assessment.	Considered by the 2025 air quality addendum report.
Active travel Connectivity	The February 2025 Proposed Amended Development of the Main Site includes a new/relocated bus stop on Stephenson Street, plus cycle and pedestrian improvements to Gilbey's Yard and Stephenson Street	Increase active travel connectivity within the Site and surrounding area.	Encouragement of active travel resulting in a reduction in private vehicle use and associated emissions to minimise exposure to poor air quality.	n/a	Any potential measures are to be confirmed and secured through future planning application(s)

Measure	Summary of the Measure	Reason for Undertaking Measure	Expected Benefit	Assessment and Reporting (Qualitative or Quantitative)	How will this Measure be Secured
Electric Vehicle (EV) Infrastructure b, c	2 no. Active EV charging spaces will be provided on the Site.	Promote / allow uptake of ULEVs as this technology becomes more widespread. Encourage sustainable transport and discourage private vehicle use.	Reduction in tailpipe emissions associated with vehicles to minimise exposure to poor air quality.	n/a	Proposed design to be secured through the planning application(s)

Overview of Mitigation Measures Excluded

3.2 No mitigation measures, which could reasonably have been expected to be implemented (taking into consideration the outcome of the technical studies), have been excluded.

4 Implementation and Monitoring

Implementation

4.1 All measures associated with the February 2025 Proposed Amended Development have been secured through the initial and subsequent planning application(s), through planning conditions or via Section 106 agreements, as detailed in Table 3-1.

Monitoring

4.2 The Site wide Travel Plan includes specific targets and monitoring which will be reviewed and updated as necessary following monitoring. Further details are provided within the Travel Assessment reports associated with the 2017 ES and subsequent planning applications.

5 Conclusions

5.1 This AQPS has been developed to demonstrate how the February 2025 Proposed Amended Development (and wider planning permissions for the Main Site) has taken an 'air quality positive' approach.

5.2 Several technical studies have been undertaken to identify current, and predicted future, air quality conditions within the Site and in the surrounding area, and to highlight any potential constraints and opportunities. This information has been used to inform the design of the February 2025 Proposed Amended Development.

5.3 Numerous measures have been proposed to minimise exposure to air pollution and to reduce emissions. These include measures intended to promote an 'air quality positive' approach through design (including land-use and building layout, travel infrastructure and landscaping), building emissions (through the energy strategy), transport emissions (through Travel Plans and transport provision) and future-proofing measures.

5.4 Overall, it is concluded that the February 2025 Proposed Amended Development has followed an 'air quality positive' approach through design and through the identification of appropriate mitigation measures. This conclusion is made in accordance with the relevant guidance (GLA, 2023).

Appendix A – Glossary

Abbreviations	Meaning
ACE	Ardent Consulting Engineers
AQFA	Air Quality Focus Area
AQMA	Air Quality Management Area
AQPS	Air Quality Positive Statement
AURN	Automatic Urban and Rural Network
CAZ	Clean Air Zone
CLP	Construction Logistics Plan
Defra	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
Diffusion Tube	A passive sampler used for collecting NO_2 in the air
EPUK	Environmental Protection UK
EV	Electric vehicle
GLA	Greater London Authority
HGV	Heavy Goods Vehicle
IAQM	Institute of Air Quality Management
LBR	London Borough of Waltham Forest
LAQM	Local Air Quality Management
LBBD	London Borough of Barking and Dagenham

Abbreviations	Meaning
LBH	London Borough of Havering
LBR	London Brough of Redbridge
LGV	Light Goods Vehicle
LLAQM	London Local Air Quality Management
LEZ	Low Emission Zone
NAQO	National Air Quality Objective as set out in Air Quality Strategy and the Air Quality Regulations
NH_3	Ammonia
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxides, considered to be nitric oxide and NO_2. The main source is from combustion of fossil fuels, including petrol and diesel used in road vehicles and natural gas used in gas-fired boilers.
NPPF	National Planning Policy Framework
PCM	Pollution Climate Mapping
PM	Particulate Matter
PM_{10} or $PM_{2.5}$	Small airborne particles less than 10/2.5 µg in diameter
PPG	Planning Practice Guidance
Receptor	A location where the effects of pollution may occur
TIP	Travel Information Pack
TPC	Travel Plan Co-Ordinator
ULEV	Ultra Low Emission Vehicle

Abbreviations	Meaning
ULEZ	Ultra-Low Emission Zone

6 Appendix B – Legislation, Policy, and Guidance

National Air Quality Legislation and Strategy

The Air Quality Strategy

6.1 The Air Quality Strategy (Defra, 2023) establishes the policy framework for ambient air quality management in the UK, with the objective of ensuring a quality of ambient air for all that would not pose a significant risk to health of quality of life. This document sets out the National Air Quality Objectives (NAQOs) and the policy for achieving them, as well as the revised target for particulate matter ($PM_{2.5}$).

6.2 Where an NAQO is unlikely to be met, the local authority must designate an Air Quality Management Area (AQMA) and draw up an Air Quality Action Plan (AQAP) which should include measures expected to ensure that the NAQOs are met within the AQMA.

National Air Quality Objectives

6.3 NAQOs were defined by The Air Quality Strategy (Defra, 2023) and enshrined in regulations by the Air Quality Standards Regulation (Statutory Instrument, 2010, No 1001) and Air Quality Standards (Amendment) Regulations (Statutory Instrument, 2016 No. 1184) which implemented the European Union Directive on ambient air quality and cleaner air for Europe (Directive 2008/50/EC). Relevant objectives are set out in Table 1-1.

6.4 The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 (UK Government, 2023) sets out new concentration and exposure reduction targets for particulate matter ($PM_{2.5}$), to be achieved by 2040. The new concentration target is an annual mean concentration of 10 µg/m^3. The new exposure reduction target is a minimum of 35% reduction in population exposure, as compared with the average population exposure in a three-year baseline period (2016 - 2018).

6.5 Analysis of long-term monitoring data suggests that if the annual mean NO_2 concentration is less than 60 µg/m^3 then the 1-hour mean NO_2 objective is unlikely to be exceeded where road transport is the main source of pollution.

6.6 This concentration has therefore been used in this Air Quality Positive Statement (AQPS) to screen whether an exceedance of the 1-hour mean objective is likely. Similarly, an annual mean PM_{10} concentration of 32 µg/m^3 is used to screen whether an exceedance of the 24-hour mean PM_{10} objective is likely.

6.7 London Local Air Quality Management Technical Guidance 2019 (LLAQM.TG(19) (Mayor of London, 2019) provides guidance to local authorities as to where NAQOs apply. These are summarised in Table 1-2.

Planning Policy

The London Plan

6.8 In London, a London Plan has been developed (Mayor of London, 2021a). This includes several references to air quality including the requirement that:

"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:

how proposals have considered ways to maximise benefits to local air quality, and

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

Camden Local Plan

6.9 The Camden Local Plan 2017 (LBC, 2017) sets out the following with reference to air quality:

"The Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough.

The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Consideration must be taken to the actions identified in the Council's Air Quality Action Plan.

Air Quality Assessments (AQAs) are required where development is likely to exposure residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permissions unless measures are adopted to mitigate the impact. Similarly, developments that introduce sensitive receptors (i.e. housing, schools in locations of poor air quality will not be acceptable unless designed to mitigate the impact".

Camden Air Quality Planning Guidance

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

6.11 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 1-1and 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 $\mu g/m^3$.

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

6.13 In terms of air quality positive the guidance sets out the following:

"The Councils overarching aim for development is to be 'air quality neutral' in operation, not lead to further deterioration of existing poor air quality, and, where possible, to improve local air quality ('air quality positive') through additional measures on and off site".

Assessment Guidance

Local Air Quality Management Technical Guidance (LAQM.TG(16))

6.14 Defra's LAQM.TG(16) guidance document (Defra, 2022) was published for use by local authorities in review and assessment work but includes a number of 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.

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

6.15 The LLAQM guidance (Mayor of London, 2019) was published for use by London local authorities in review and assessment work but includes a number of 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.

Air Quality Positive

6.16 The Air Quality Positive Guidance (GLA, 2023) was published by the Mayor of London in February 2023. The guidance details how and in what context consideration of 'Air Quality Positive' should be undertaken and outlines the required minimum contents of an AQPS.