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Dear Laura,

### **Hawley Wharf, Camden – Update to Air Quality Assessment**

Wardell Armstrong has been instructed to undertake an air quality assessment to accompany an application for a proposed change of use of a space within Camden Market in central London.

The application seeks approval to use the existing basement area of the market for interactive entertainment and immersive experience with ancillary events (*Sui Generis*). The existing basement area is used for Interactive entertainment which includes a combination of immersive theatre and team challenges (*Sui Generis*). The basement is set is over two levels, with the upper level partially open to the outside and accessed from ground floor level by steps. The floor area of the site is 1,881m<sup>2</sup> for the upper level and 1,595m<sup>2</sup> for the lower level.

The Proposed Development site is bordered to the west by Camden High Street, to the north by a railway line and to the south and east by the Regents Canal. The Proposed Development is located within the administrative area of London Borough of Camden (LBC), which is responsible for the management of local air quality.



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## Camden Planning Guidance for Air Quality

Policy CC4 of the Camden Local Plan<sup>1</sup> specifically relates to air quality. This states that the Council will *“take into account the impact of air quality when assessing development proposals”* and will ensure that *“the impact of development on air quality is mitigated”*.

A review has therefore been undertaken of the Camden Planning Guidance (CPG) for Air Quality (January 2021), developed by LBC, which enables the type of assessment required to be determined.

## Local Air Quality

A review of the 2022 Annual Status Report (ASR) for LBC (published in August 2023 and the latest report available on its website) indicates that the entire borough has been declared as an Air Quality Management Area (AQMA). The AQMA has been declared for exceedance of the annual mean objective for nitrogen dioxide (NO<sub>2</sub>) and the 24-hour mean objective for fine particulate matter (PM<sub>10</sub>).

The 2022 ASR provides details of five automatic and 32 non-automatic monitoring locations that were operational in 2022. The closest LBC-operated monitoring locations to the site are NO<sub>2</sub> diffusion tubes on Camden High Street (Bridge) (CAM128), Hartland Road (CAM137) and Hawley Crescent (CAM126). These are all located within 150m of the site and are all in roadside locations.

The closest urban background monitoring location is the Coopers Lane automatic monitor, located at St Pancras railway station, approximately 1.4km to the south-east. This measures PM<sub>10</sub> only.

The 2022 monitoring data for the closest diffusion tubes and automatic monitor to the site is detailed in Table 1.

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<sup>1</sup> Camden Local Plan, 2017 [Accessed at: <https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6>]



Table 1: 2022 Monitoring Data for London Borough of Camden Automatic and Non- Automatic Monitoring Locations		
Monitoring Location	2022 Annual Mean Concentration ( $\mu\text{g}/\text{m}^3$ )	
	Nitrogen Dioxide ( $\text{NO}_2$ )	Fine Particulate Matter ( $\text{PM}_{10}$ )
Camden High Street (Bridge) (CAM128)	27.18	N/A
Hartland Road (CAM137)	22.76	N/A
Hawley Crescent (CAM126)	26.4	N/A
Coopers Lane (KGX)	N/A	15

Data has also been obtained from the 2021-based default concentration maps provided by Defra on their Local Air Quality Management (LAQM) web pages<sup>2</sup>. The background pollutant concentrations for the appropriate 1km x 1km grid square are detailed in Table 2.

Table 2: Background Air Pollutant Concentrations Obtained from the 2021-Based Defra Default Concentration Maps			
Proposed Development Site Coordinates	2025 Pollutant Concentrations ( $\mu\text{g}/\text{m}^3$ )		
	Nitrogen Dioxide ( $\text{NO}_2$ )	Particulate Matter ( $\text{PM}_{10}$ )	Particulate Matter ( $\text{PM}_{10}$ )
528500, 184500	20.23	16.43	8.92

The annual mean air quality objective for both  $\text{NO}_2$  and  $\text{PM}_{10}$  concentrations is  $40\mu\text{g}/\text{m}^3$ . The background  $\text{NO}_2$  and  $\text{PM}_{10}$  concentrations in the local area are likely to be below this objective.

### Scope of Air Quality Assessment

LBC has prepared planning guidance on air quality<sup>3</sup> to support the policies in the Camden Local Plan 2017. This provides guidance on the triggers for an air quality assessment.

Table 1 of the LBC guidance has been followed to determine the type of assessment that is considered appropriate for the Proposed Development. The results of this are set out in Table 3.

<sup>2</sup> Accessed at: <https://uk-air.defra.gov.uk/data/laqm-background-home>

<sup>3</sup> London Borough of Camden, Camden Planning Guidance: Air Quality, January 2021



Table 3: Air Quality Assessment Triggers		
Criteria	Criteria Met?	Discussion
Scale of development	Major	Floorspace subject to change of use is more than 1,000m <sup>2</sup>
Area of poor air quality	Yes	Within the borough-wide AQMA, nearby monitoring data suggests that NO <sub>2</sub> and PM <sub>10</sub> concentrations are below the objective, aside from at one location where NO <sub>2</sub> concentrations exceed the objective
Scheme brings sensitive receptors	No	No residential uses are proposed. Although users of the building may be present for more than an hour, there is no information available to suggest that exceedances of the short term (i.e. 24-hour mean) objective for PM <sub>10</sub> are likely
Scheme brings air quality impacts	No	No significant difference in trip generation expected as a result of the change of use

These criteria suggest that a basic air quality assessment is considered to be sufficient for the Proposed Development. In addition, the guidance suggests that an air quality neutral assessment and the consideration of construction and demolition impacts need to be taken into account. Further information on these is included later in this letter report.

### Construction Phase Impacts

The proposals are for the conversion of the existing basement levels only and it has been confirmed that the required construction works will all take place internally. Construction works will be tenant fit-out only.

A review of relevant guidance has been undertaken to consider the potential for significant effects during the construction phase of the Proposed Development. The review takes into account guidance from the Mayor of London<sup>4</sup> and the Institute of Air Quality Management (IAQM)<sup>5</sup>.

It is considered that, with site-specific mitigation measures in place, there will be a 'not significant' residual effect associated with dust and PM<sub>10</sub>.

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<sup>4</sup> Mayor of London, Sustainable Design and Construction Supplementary Planning Guidance, April 2014

<sup>5</sup> Institute of Air Quality Management, Guidance on the Assessment of Dust from Demolition and Construction, August 2023



## **Operational Phase Impacts**

The proposed change of use will provide conversion of the current uses of the lower ground floor and basement into a sui generis family entertainment use. It has been confirmed by the client that no car parking is proposed, due to the central location and the site has good accessibility in terms of public transport.

Nearby public transport options include:

- Underground services from the Camden Town and Chalk Farm stations, which are located approximately 300m and 650m away, respectively; and
- Bus services which can be accessed from a number of bus stops along Camden High Street. These serve a wide variety of key locations, at a frequency of at least six services per hour.

In addition, good footpaths and street lighting are present along Camden High Street and the walking routes to the closest stations. Users of Building A1 will also have access to cycle parking spaces, which will be dispersed throughout the site in areas that are overlooked and easily accessible.

The Proposed Development will be unheated.

## **Air Quality Neutral**

The proposals are for a change of use to an existing building. No car parking is proposed at the site due to nearby public transport links and no significant change to delivery vehicles is expected. In addition, no new heating plant is proposed. As a result, it is considered likely that there will be no significant change to existing vehicle and building emissions at the premises.

## **Summary**

A review has been undertaken, in accordance with relevant guidance and policy, to consider the potential for air quality impacts during the construction and operational phases of the proposed development.

This review suggests that any effects should not be significant and that significant changes to vehicle and building emissions are not expected.



Yours sincerely  
for Wardell Armstrong LLP

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