AIR QUALITY ASSESSMENT

369 – 377 Kentish Town Road

Produced by XCO2 for dMFK Architects

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XCO2 56 Kingsway Place, Sans Walk London EC1R OLU +44 (0)20 7700 1000 mail@xco2.com xco2.com



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Remarks	Draft			
Prepared by	SD			
Checked by	SP			
Authorised by	RM			
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EXECUTIVE SUMMARY

An assessment has been undertaken to quantify the potential impacts on local air quality associated with the construction and operation of the proposed development. Based on the results of the assessment, it is considered that redevelopment of the site would not cause a significant impact on local air quality.

An assessment of potential air quality impacts arising from the construction and operation of the proposed development on Kentish Town Road Road in the London Borough of Camden has been undertaken.

During the construction phase, the site has the potential to generate dust nuisance beyond the application boundary. However, through the implementation of a Dust Management Plan, the impacts will be effectively minimised and are unlikely to be significant.

Emissions from operational traffic associated with the proposed development are not anticipated to significantly affect local air quality however dispersion modelling of emissions from traffic on the local road network has been undertaken to ascertain the likely level of exposure of future occupants of the proposed development to elevated nitrogen dioxide and particulate concentrations. The assessment indicates that there will be an exceedance of the annual mean NO₂ objective up to first-floor level. Mechanical ventilation with NOx filtration has therefore been recommended.

The proposed development has been assessed as air quality neutral with respect to building-related emissions.



INTRODUCTION

This report presents an assessment of the potential impact on local air quality of the construction and operation of a proposed development at 369 – 377 Kentish Town Road in the London Borough of Camden.

The site is currently occupied by number of single storey buildings and is currently a car wash facility. The proposal is to construct a new seven storey building consisting of fourteen new residential dwellings with commercial space at ground-floor level.

The location of the proposed development is presented in Figure 1. The site falls within the Camden Air Quality Management Area (AQMA), which is a borough-wide designation due to measured and modelled exceedances of the air quality objectives for nitrogen dioxide (NO₂) and particulate matter (as PM₁₀). The primary source of these pollutants in the Borough is road traffic.

The proposed development has potential to introduce the following air quality impacts:

- Suspended and re suspended fugitive dust emissions from demolition / construction activities;
- Emissions from construction traffic, including re suspended dust from HGV movements; and
- Emissions from operational traffic.

An assessment has been undertaken to determine the potential impact on local air quality during both the construction and operational phases of the development, with recommendations made for mitigation where appropriate.





Figure 1: Site Location



POLICY CONTEXT

An overview of the relevant policy drivers for the assessment is provided in the following section.

EUROPEAN LEGISLATION

Within the European Union, ambient air quality is currently regulated through the Ambient Air Quality Directive $2008/50/EC^1$ and the Fourth Daughter Directive $2004/107/EC^2$. These directives set limit values and target values for ambient pollutant concentrations. The limit values are legally binding and must not be exceeded, whereas the target values are to be attained where it is cost effective to do so.

The Ambient Air Quality Directive provides limit values for sulphur dioxide (SO₂), nitrogen dioxide (NO₂), benzene (C₆H₆), carbon monoxide (CO), lead (Pb) and particulate matter (PM₁₀ and PM_{2.5})³. The Fourth Daughter Directive provides target values for arsenic (As), cadmium (Cd), nickel (Ni), benzo(a)pyrene (B(a)P), mercury (Hg) and polycyclic aromatic hydrocarbons (PAH)⁴.

The EU limit values have been adopted into UK law via the Air Quality Standards Regulations 2010⁵.

In the context of the proposed development, the primary pollutants of concern are NO_2 , PM_{10} and $PM_{2.5}$ from traffic on roads close to the site. A summary of the European limit values for the protection of human health for these pollutants is presented in Table 1.

Pollutant	Averaging Period	Limit Value (µg/m³)	Comments
NO ₂	1-hour	<200	Not to be exceeded more than 18 times per calendar year (equivalent to the 99.8 th percentile of 1-hour means)
	Calendar year	40	-
PM ₁₀	PM ₁₀ 1-day 50		Not to be exceeded more than 35 times per year (equivalent to the $90.4^{\rm th}$ percentile of 24-hour means)
	Calendar Year	40	-
DM	Calendar Year	25	Stage 1 LV (to be met by 01/01/15)
PM _{2.5}	Calendar Year	20	Stage 2 LV (to be met by 01/01/20)>

Table 1: Pollutant Limiting Values



¹ Directive 2008/50/EC of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe.

² Directive 2004/107/EC of the European Parliament and of the Council of 15 December 2004 relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air.

 $^{^3}$ Particulate matter with an aerodynamic diameter below 10 μm and below 2.5 $\mu m.$

⁴ Polycyclic aromatic hydrocarbons other than benzo(a)pyrene.

⁵ The Air Quality Standards Regulations 2010, Statutory Instrument 2010 No. 1001, Environmental Protection.

NATIONAL LEGISLATION

THE AIR QUALITY STRATEGY FOR ENGLAND, SCOTLAND, WALES AND NORTHERN IRELAND

The Air Quality Strategy for England, Wales and Northern Ireland⁶ was published in 2007 and sets out policy targets (objectives) for SO₂, NO₂, C₆H₆, CO, Pb, PM₁₀, PM_{2.5}, 1,3-butadiene (C₄H₆) and PAH. These objectives are generally in line with those set by the European Directives, although more stringent particulate and benzene objectives apply in Scotland (and in Northern Ireland for benzene).

The air quality objectives (AQO) for NO₂, PM₁₀ and PM_{2.5} in England do not differ from those presented in Table 1.

In January 2019 the UK government published a Clean Air Strategy⁷, which outlines measures to reduce emissions from a wide range of sources including transport, farming and industry. The Strategy proposes new local powers to implement Clean Air Zones in problem areas, backed up by clear enforcement mechanisms. Whilst the UK has already adopted legally binding international targets to reduce emissions of key pollutants such as nitrogen oxides and particulate matter (as PM_{10}), the Strategy aims to reduce fine particulate emissions ($PM_{2.5}$) to ensure that public exposure to concentrations above the more stringent WHO annual mean guideline value of 10 μ g/m³ is halved by 2025.

LOCAL AIR QUALITY MANAGEMENT

The framework for Local Air Quality Management (LAQM) in the UK was introduced by the Environment Act 1995⁸. Local Authorities are required to regularly review and assess air quality to establish whether there are any locations where pollutant concentrations exceed the relevant air quality objectives or EU limit values. Where an exceedance is identified the local authority is obliged to declare an Air Quality Management Area (AQMA) and prepare an Action Plan setting out measures to improve air quality and achieve compliance with the objective(s).

THE NATIONAL PLANNING POLICY FRAMEWORK

The National Planning Policy Framework (NPPF)⁹ sets out the Government's policies for planning and how these should be applied. With regard to air quality, the NPPF states that local "Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan."

The revised NPPF¹⁰ was published in July 2018 (updated in February 2019) and states that "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



⁶ The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, Department for Environment, Food and Rural Affairs in partnership with the Scottish Executive, Welsh Assembly Government and Department of the Environment Northern Ireland, July 2007.

⁷ Clean Air Strategy 2019, Defra, January 2019

⁸ Part IV of the Environment Act 1995

⁹ National Planning Policy Framework, Department for Communities and Local Government, March 2012.

¹⁰ Department for Communities and Local Government, National Planning Policy Framework, July 2018 (updated February 2019)

impacts from individual sites in local areas". It outlines the principles upon which the planning process can take account of air quality impacts associated with new developments. It outlines the role of Local Plans in promoting sustainability and providing limitations on development in areas of poor air quality. An emphasis is placed on consultation with the planning authority to determine whether there are any local issues with the potential to affect the scope of an air quality assessment. Typical air quality mitigation measures are outlined highlighting the use of planning conditions and funding obligations to off-set any significant impacts.

REGIONAL POLICY

THE LONDON PLAN

Policy 7.14 of the London Plan¹¹ sets out the Mayor of London's commitment to improving air quality and public health. It states that development proposals should 'minimise increased exposure to poor air quality' by:

- Promoting sustainable transport;
- Promoting sustainable design and construction;
- Being air quality neutral, particularly in AQMAs;
- Ensuring that where a potential impact on air quality is identified, appropriate mitigation measures are proposed which demonstrate a clear benefit to local air quality; and
- Providing detailed air quality assessments for non-transport sources such as on-site biomass boilers and combined heat and power (CHP) plants to assess the potential impact of emissions on air quality.

A draft New London Plan¹² was published in November 2017 and includes Policy SI1 (Improving Air Quality) which states that '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
- c) reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality
- d) create unacceptable risk of high levels of exposure to poor air quality.'

THE MAYOR OF LONDON'S AIR QUALITY STRATEGY (2010)

The Mayor of London's Air Quality Strategy¹³ outlines the Mayor's commitment to improving air quality in London. The objective of the plan is to significantly reduce NO_2 and PM_{10} concentrations through a number of measures including:

- Ensuring all buses meet Euro IV emission standards;
- Introducing age limits for taxis and Private Hire Vehicles to remove older, more polluting vehicles from the roads;
- Including large vans and minibuses in the Low Emission Zone (LEZ)
- Introducing a new NOx standard in the LEZ; and
- Working with Borough to implement traffic management strategies to reduce congestion.



¹² The London Plan, Draft for Consultation, November 2017

¹³ Clearing the Air, The Mayor's Air Quality Strategy, December 2010.

LOCAL POLICY

THE LONDON BOROUGH OF CAMDEN LOCAL AIR QUALITY MANAGEMENT

The London Borough of Camden carries out frequent assessments of air quality within the area and produces annual reports in accordance with the requirements of Defra.

Historically, routine monitoring has identified widespread exceedances of the air quality objectives for NO_2 and PM_{10} . As a consequence, in 2002, the Council declared a Borough-wide AQMA for these pollutants. More recent monitoring indicates that the NO_2 objectives are still widely exceeded at roadside locations within the Borough, but PM_{10} concentrations are now generally within the objective.

A number of policies relating to improving air quality are contained within the London Borough of Camden's Core Strategy¹⁴. In particular policy CS16 (Improving Camden's health and wellbeing) recognises the impact of poor air quality on public health.

CAMDEN'S CLEAN AIR ACTION PLAN

Camden's Clean Air Action $Plan^{15}$ outlines the Councils commitment to improving air quality in the Borough. The key objectives of the plan are to reduce PM_{10} and NO_2 concentrations by:

- encouraging the use of clean fuels and technologies;
- promoting energy efficient to reduce fossil fuel usage;
- raising awareness of air quality issues and promoting lifestyle changes which reduce air pollution and improve the health of local residents; and
- working in partnership with other organisations to foster improvements in air quality.

The Action Plan is supported by The Camden Plan¹⁶ and Camden's Environmental Sustainability Plan¹⁷ drawing on European and National legislation in conjunction with national, regional and local policy to manage and improve air quality across the Borough.

The Borough has been designated a 'Clear Zone' focussing on reducing traffic congestion and promoting sustainable transport initiatives. Development Policy DP32 (Air Quality and Camden's Clear Zone)¹⁸ states that planning permission will only be granted for developments that are likely to significantly increase travel demands where 'appropriate measures to minimise impacts are incorporated'.



 $^{^{\}rm 14}$ Camden Core Strategy 2010 – 2025, Adopted 2010.

¹⁵ London Borough of Camden, Camden's Clean Air Action Plan 2016-2018.

¹⁶ The Camden Plan 2012 - 2017

 $^{^{17}}$ Green Action for Change 2012 – 2020.

¹⁸ Camden Development Policies 2010 – 2025

METHODOLOGY

This section outlines the assessment methodology, taking into account all relevant national and local policies and technical guidance relating to air quality.

CONSTRUCTION DUST

The potential impact of dust generated during site enabling, earthworks and construction works at the proposed development has been undertaken in accordance with the Mayor of London's SPG for the control of dust and emissions during construction and demolition¹⁹, which is closely aligned with the Institute of Air Quality Management (IAQM) construction dust guidance²⁰. A full description of the construction dust methodology is provided in Appendix A.

A detailed assessment of dust impacts is required where there are human or ecological receptors within:

- 50m of the site boundary; or
- 50m of the route(s) used by construction vehicles on public roads, up to 500m from the site entrance(s).

The IAQM/ SPG methodology allows the potential risk of dust soiling and human health effects to be determined, based primarily on the sensitivity of nearby receptors (human and ecological) and the anticipated magnitude of the dust emission due to:

- Demolition;
- Earthworks;
- Construction; and
- Track-out (re-suspended dust from vehicle movements).

The assessment of dust risk is also based on professional judgement taking into account factors such as the prevailing wind direction, the proposed construction phasing, the likely duration of dust raising activities, local topography and existing air quality.

A range of best practice mitigation measures are provided within the guidance, which are dependent on the level of dust risk attributed to the site. It is recommended that these measures are incorporated into a Dust Management Plan (DMP) for the proposed development.

The significance of the residual impacts following appropriate mitigation is determined by professional judgement.

CONSTRUCTION TRAFFIC

Construction traffic will contribute to existing traffic levels on the surrounding road network. However, the temporary increase in traffic is considered unlikely to be significant in terms of total flow or construction duration.



¹⁹ The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance, The Mayor of London, July 2014

²⁰ Guidance on the assessment of dust from demolition and construction, IAQM,v1.1 June 2016

All non-road mobile machinery (NRMM) will comply with the emission standards specified in the Mayor of London's Control of Dust and Emissions during Construction and Demolition SPG.

The impact of vehicular emissions of NO_2 and PM_{10} from construction traffic and on-site machinery on local air quality is considered to be negligible.

OPERATIONAL TRAFFIC

The Environmental Protection UK (EPUK)/ IAQM planning guidance²¹, states that for developments within or near an AQMA, a detailed assessment of traffic-related impacts is required where:

- There is a change in the annual average daily traffic (AADT) flow of light goods vehicles (LGV) of more than 100 vehicles; and/or
- There is a change in the AADT flow of heavy goods vehicles (HGV) of more than 25 vehicles; and/or
- There is a change in the road re-alignment by more than 5m; and/or
- A new junction is introduced, which will significantly alter vehicle speeds.

The proposed development will be car-free and therefore the impact of the operational traffic on local air quality has therefore been scoped out of the assessment. However, modelling of emissions from traffic on the local road network has been undertaken using the ADMS-Roads dispersion model to predict pollutant concentrations at the development site and determine whether on-site mitigation will be required to protect future occupants from poor air quality.

A summary of the model input parameters is presented in Appendix B.

EMISSION FACTORS

Concentrations of NOx, PM_{10} and $PM_{2.5}$ have been predicted using 2016 vehicle emission factors from the latest version of the Emissions Factor Toolkit (v8.0.1)²². The predicted NOx concentrations have been converted to NO₂ using version 6.1 of the NOx to NO₂ calculator, available from the Defra air quality website²³.

The Emission Factor Toolkit predicts a year on year reduction in emissions due to improvements in vehicle abatement technologies. Using emission factors from 2016 is considered to provide a conservative assessment of future air quality at the proposed development.

METEOROLOGICAL DATA

Meteorological data from London City Airport (approximately 12 km southeast of the proposed development) has been used in the dispersion modelling.



²¹ Land-use Planning and Development Control: Planning for Air Quality, Guidance from Environmental Protection UK and the Institute of Air Quality Management for the consideration of air quality within the land use planning and development control process, January 2017.

²² http://laqm.defra.gov.uk/review-and-assessment/tools/emissions-factors-toolkit.html

²³ http://laqm.defra.gov.uk/review-and-assessment/tools/background-maps.html#NOxNO2calc

SENSITIVE RECEPTORS

Concentrations of NO_2 have been predicted at ground, first and second using Cartesian grid of 5 m resolution over the full extent of the development site, allowing an additional 1.5m elevation within each floor for the potential exposure and breathing zone.

Concentrations of PM_{10} and $PM_{2.5}$ have been predicted at ground floor level only.

VERIFICATION

There is an inherent level of uncertainty associated with any assessment process; however, the methodology presented has been developed to minimise errors where possible. Potential errors in predicted concentrations due to uncertainties in the assessment source activity data (e.g. traffic flows and emission factors) and the estimated background concentration are minimised by the verification of modelled concentrations using local monitoring data.

The 2016 Local Air Quality Management Technical Guidance (LAQM.TG16)²⁴ recommends that modelled concentrations should be within 25% of monitored concentrations, ideally within 10%. Where there is a large discrepancy between modelled and measured concentrations, it is considered necessary to adjust the model results to more accurately reflect local air quality.

The modelled NO₂ concentrations have been verified using 2016 data from a London Borough of Camden diffusion tube CA16 on Kentish Town Road, approximately 150m south of the proposed development. Full details of the model verification process are presented in Appendix C.

BUILDING-RELATED EMISSIONS

Heat and water will be supplied to the proposed dwellings by communal gas boilers, which will be compliant with the NOx emission limit of 40 mg/kWh specified in the Mayor of London's SPG.

An assessment has been undertaken to determine whether the building-related emissions will be air quality neutral, in accordance with the London Plan.

24 Local Air Quality Management Technical Guidance (LAQM.TG16), Defra, February 2018



BASELINE AIR QUALITY

Through an analysis of local monitoring data, a description of existing air quality near the proposed development is provided and appropriate baseline pollutant concentrations are determined for use in the assessment.

LOCAL AIR QUALITY MONITORING

Automatic monitoring of ambient air quality is not undertaken in the vicinity of the proposed development. The nearest monitor site that is considered relevant to the assessment is operated by the London Borough of Islington at an urban background location in Highbury, approximately 2.5 km east-northeast of the site. The site is affiliated to the London Air Quality Network (LAQN) and therefore the measured data are subject to high levels of quality assurance (QA) and quality control (QC). A description of the sites is presented in Table 2.

Table 2: Automatic Monitoring Sites

Site Name	Туре	Easting	Northing	Pollutants Monitored	Approximate Location Relative to Proposed Development
IS6 Arsenal	Urban Background	531328	186067	NO ₂ , PM ₁₀	2.5km east-northeast

Annual mean NO_2 and PM_{10} concentrations measured at these locations between 2014 and 2018 and are summarised in Table 5, together with the number of measured exceedances of the short-term AQO's.

The automatic monitoring data indicates that annual mean background NO_2 concentrations are well within the AQO of 40 μ g/m³ and the number of measured exceedances of the 1-hour mean objective is also well below the 18 allowable.

Annual mean PM_{10} concentrations are 50% or less than the AQO of 40 μ g/m³ and the number of exceedances of the 24-mean AQO was also well within the 35 allowable.

Table 3: Automatic Monitoring Data

Site Name	2014	2015	2016	2017	2018
Annual Mean NO ₂ (µg/m³)	35	29	33	31	27
Number of Predicted Exceedances of the 1-Hour Mean AQO of 200 $\mu g/m^3$ (b)	0	0	0	1	0
Annual Mean PM_{10} (µg/m ³)	16	15	18	18	20
Number of Predicted Exceedances of the 24-Hour Mean AQO of 50 $\mu g/m^3$ (b)	0	1	3	3	1



There are two NO_2 diffusion tube monitoring sites that are considered relevant to the proposed development, details of which are presented in Table 4.

Table 4: Diffusion Tube Monitoring Sites

Site ID	Location	Туре	Easting	Northing	Approximate Location Relative to Proposed Development
CA16	Kentish Town Road	Roadside	521447	188730	150 m south
BIS005/12	Lady Margaret Road	Urban background	521885	190489	640 m northeast

Five years of annual mean NO₂ concentrations measured at these locations are summarised in Table 5.

The data indicate that the annual mean AQO for NO₂ of 40 μ g/m³ is routinely exceeded at the Kentish Town Road monitoring site. This location is highly congested and poor air quality is likely to be exasperated by street canyon effects. Measurements across the UK²⁵ have shown that the 1-hour NO₂ objective may be exceeded if the annual mean concentration is greater than 60 μ g/m³. Based on the measured concentrations, there is a risk that the short-term objective is also being exceeded at locations close to Kentish Town Road.

Annual mean NO_2 concentrations at Lady Margaret Road urban background site are less than 90% of the air quality objective.

Table 5: Annual Mean NO₂ Concentrations (μ g/m³)

Site Name	2013	2014	2015	2016	2017
Kentish Town Road (roadside)	65.3	57.8	63.6	58.7	74.9 (a)
Lady Margaret Road (background)	33	33	35	36	34
(a) Data capture < 90%					

DEFRA MAPPED BACKGROUND CONCENTRATIONS

Background NO₂, PM₁₀ and PM_{2.5} concentrations have been obtained from the Defra UK Background Air Pollution maps²⁶ for comparison with the measured data. These 1km grid resolution maps are derived from a complex modelling exercise that takes into account emissions inventories and measurements of ambient air pollution from both automated and non-automated sites. The latest background maps were issued in November 2017 and are based on 2015 monitoring data, with projections for future years.

A summary of the 2016 mapped annual mean background concentrations at the proposed development is presented in Table 6. The concentrations have been determined from contour plots of the mapped data.

The mapped annual mean NO₂ concentration (31.8 μ g/m³) is lower than both the concentration measured by diffusion tube at Lady Margaret Road (36 μ g/m³) and the concentration measured at the Arsenal automatic monitoring site (33 μ g/m³). The concentration measured at Lady Margaret Road in 2016 was the highest measured between 2013 and



²⁵ D Laxen and B Marner: Analysis of the relationship between 1-hour and annual mean nitrogen dioxide at UK roadside and kerbside monitoring sites, July 2003

²⁶ http://laqm.defra.gov.uk/review-and-assessment/tools/background-maps.html

2017. This concentration has been used in the assessment to ensure that that the predicted concentrations at the proposed development are as conservative as possible.

The mapped PM_{10} concentration is slightly higher than the concentration measured at the Arsenal automatic monitoring station and therefore the mapped particulate data are considered to provide a reasonable estimate of existing a future background air quality at the proposed development.

Table 6: Background Pollutant Concentrations for 2016 (µg/m³)

Pollutant	Mapped	Assessment Value	AQO/ EAL (µg/m³)
NO ₂	31.8	36.0	40
PM ₁₀	18.8	18.8	40
PM _{2.5}	12.0	12.0	25



POTENTIAL IMPACTS

The potential impacts and significance of these impacts on air quality during the construction and operational phases of the development are identified in this section. Suggested mitigation measures are outlined in a subsequent section of the report.

CONSTRUCTION DUST

SENSITIVITY OF THE AREA TO DUST IMPACTS

The assessment of dust impacts is dependent on the proximity of the most sensitive receptors to the site boundary. A summary of the receptor and area sensitivity to health and dust soiling impacts is presented in Table 7Table 7. The sensitivity of the area to health impacts is dependent on the existing PM_{10} concentration. There are no local particulate monitoring sites to establish existing concentrations at sensitive receptor locations, however based on the estimated background concentration and the level of congestion on Kentish Town Road and the close proximity of the railway, it is considered likely that roadside annual mean PM_{10} concentrations in the area are between 24 and 28 μ g/m³.

Receptor Distance from		Number of	Sensitivity to He	alth Impacts	Sensitivity to Dust Soiling Impacts	
Site Boundary		Receptors	Receptor	Area	Receptor	Area
	<20 m	10 - 100		High		High
Residential Properties	<50 m	10 - 100	High	Medium	High	Medium
	< 100 m	>100		Low		Medium
Shops	< 20m	10 - 100	Medium	Low	Medium	Medium
Primary School	220 m	>100	High	Low	High	Medium
Overall Sensitivity of the Area		Low		High		

Table 7: Sensitivity of Receptors and the Local Area to Dust Impacts

The precise behaviour of the dust, its residence time in the atmosphere and the distance it may travel before being deposited, will depend upon several factors. These include wind direction and strength, local topography and the presence of intervening structures (buildings, etc.) that may intercept dust before it reaches sensitive locations. Furthermore, dust would be naturally suppressed by rainfall.

Wind roses for London City Airport are presented in Appendix D, which show that the prevailing wind is from the southwest, therefore receptors to the northeast of the site are most likely to experience dust impacts during the construction phase.

There are no dust sensitive ecological sites within 50m of the site; therefore, impacts on ecology have not been considered in the assessment.

DUST EMISSION MAGNITUDE

• **Demolition** - The existing light industrial buildings on-site will require demolition as part of the proposals. The buildings are steel framed and metal clad and have limited potential for dust generation. The magnitude of the dust emission during the demolition phase is considered to be 'negligible'.



- **Earthworks** Earthworks will primarily involve excavating material, haulage, tipping and stockpiling. It may also involve levelling of the site and landscaping. Based on the size of the site (355 m²) it is unlikely that there will be sufficient space for long-term stockpiling of dusty materials or large numbers of earth moving vehicles. The magnitude of the dust emission during the earthworks phase is considered to be 'small'.
- **Construction** Dust emissions during construction depend on the scale of the works, method of construction, materials used and the duration of the build. The proposed development is likely to comprise a reinforced concrete frame with external brick finish. It is not currently known whether concrete batching will be undertaken on site. Based on the scale of the development (approximately 6,000 m³), the magnitude of the emission during construction is considered to be 'small'.
- **Trackout** Access to the site during the construction phase to the wider road network will be via Kentish Town Road, where there are sensitive receptors within 20m of the carriageway. However, based on the size of the site and the limited potential for lengthy unpaved haul roads, the likely dust emission magnitude due to trackout is considered to be 'small'.

ASSESSMENT OF DUST RISK PRIOR TO MITIGATION

A summary of the potential risk of dust impacts prior to mitigation, based on the low sensitivity of the area to human health impacts and high sensitivity to dust soiling impacts is presented in Table 8.

Dust Source	Emission Magnitude	Human Health Risk	Dust Soiling Risk	Overall Risk
Demolition	Negligible	Negligible	Negligible	Negligible
Earthworks	Small	Low	Low	Low
Construction	Small	Low	Low	Low
Trackout	Small	Negligible	Low	Low

Table 8: Risk of Dust Impacts Prior to Mitigation

PREDICTED CONCENTRATIONS AT THE PROPOSED DEVELOPMENT SITE

NITROGEN DIOXIDE

Contour plots showing the ground-level annual mean NO_2 concentrations across the development site at ground, first and second floor level are presented in Figures 2 to 4.

The annual mean NO_2 concentrations are predicted to exceed the air quality objective of 40 μ g/m³ at ground and first floor level. By second-floor level the concentrations are predicted to be below the objective across the site.

The ground-floor of the development will be used for retail purposes and providing access to the residential dwellings (which are situated at first-floor level and above). Consequently, public exposure to poor air quality at ground-floor level will be short-term only. The predicted annual mean NO_2 concentrations at the façade of the proposed development are below 60 μ g/m³ and therefore the risk of an exceedance of the 1-hour mean AQO is considered to be negligible.



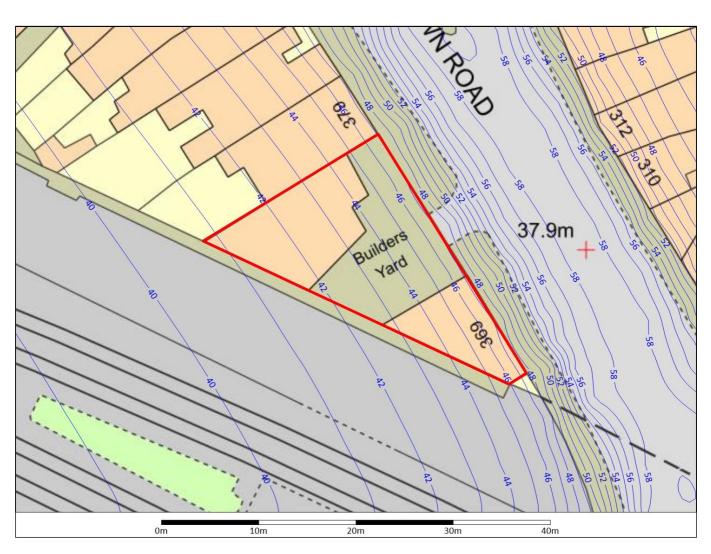


Figure 2: Predicted Ground-Floor Level Annual Mean NO_2 Concentrations ($\mu g/m^3$) \odot Crown copyright, All rights reserved. 2019 Licence number 0100031673



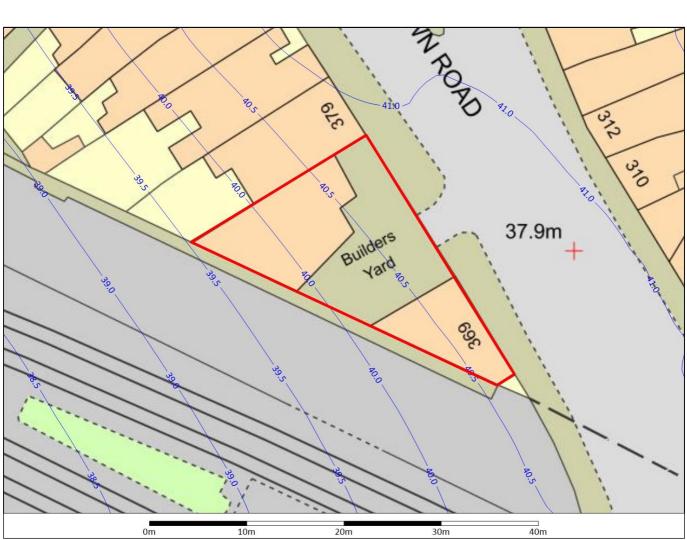


Figure 3: Predicted First-Floor Level Annual Mean NO_2 Concentrations ($\mu g/m^3$) \odot Crown copyright, All rights reserved. 2019 Licence number 0100031673



AIR QUALITY ASSESSMENT

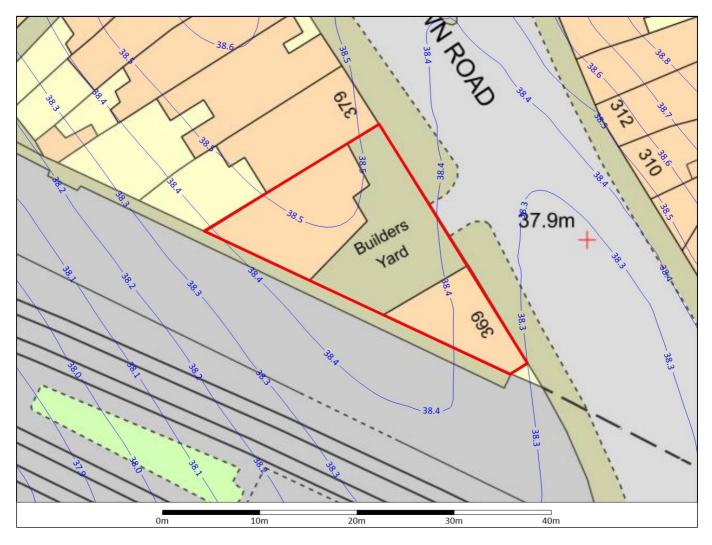


Figure 4: Predicted Second-Floor Level Annual Mean NO_2 Concentrations ($\mu g/m^3$) \odot Crown copyright, All rights reserved. 2019 Licence number 0100031673

PARTICULATE MATTER

Contour plots showing the ground-level annual mean PM_{10} and $PM_{2.5}$ concentrations across the development site at ground and first-floor level are presented in Figure 5 and Figure 6. The predicted concentrations are well within the relevant long-term air quality standards across the development site.

LAQM.TG(16) provides a relationship between predicted annual mean PM_{10} concentrations and the likely number of exceedances of the short-term (24-hour mean) PM_{10} objective of 50 µg/m³. The objective allows 35 exceedances per year, which is equivalent to an annual mean of 32 µg/m³. On this basis, the dispersion modelling indicates that compliance with the short-term PM_{10} objective is also likely to be achieved at all locations on site.



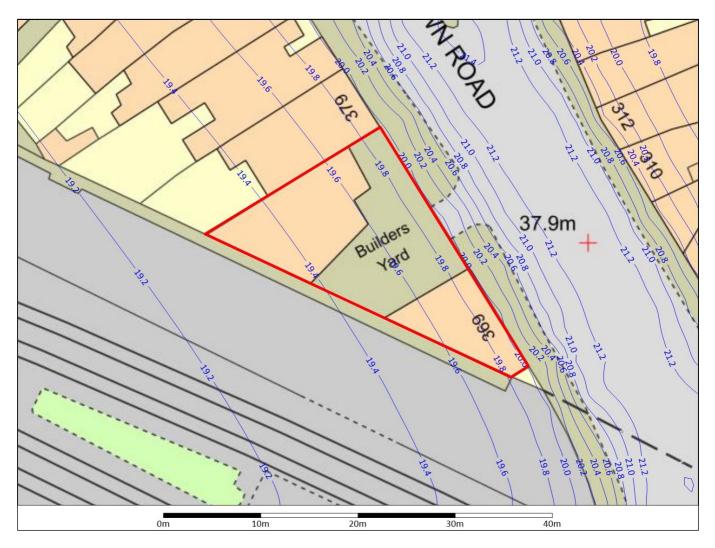


Figure 5: Predicted Ground Level Annual Mean PM₁₀ Concentrations (μg/m³). © Crown copyright, All rights reserved. 2019 Licence number 0100031673



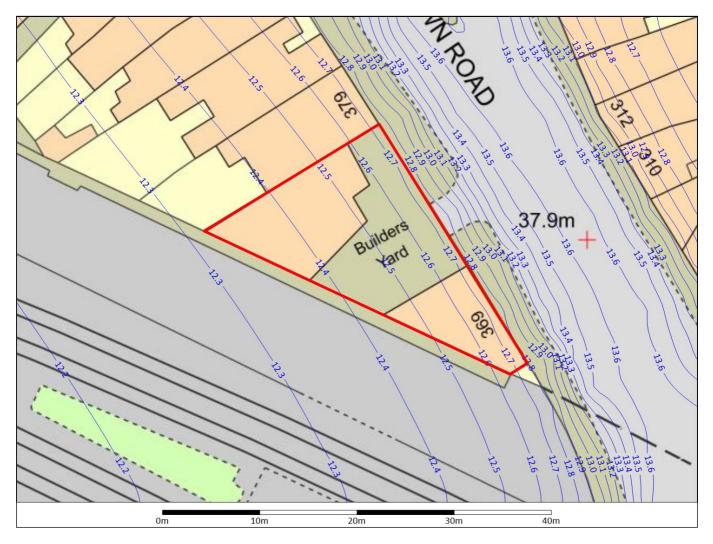


Figure 6: Predicted First Floor Level Annual Mean $PM_{2.5}$ Concentrations (μ g/m³). \odot Crown copyright, All rights reserved. 2019 Licence number 0100031673



AIR QUALITY NEUTRAL ASSESSMENT

This section presents an air quality neutral assessment in accordance with The London Plan. It is found that the proposed development will be Air Quality Neutral with respect to building-related emissions.

BUILDING EMISSIONS

The air quality neutral assessment for building-related emissions compares the emissions from the individual gas-fired boilers at the site with benchmarked emissions based on the floor space as specified in the Air Quality Neutral Planning Support Document (PSD)²⁷

The Building Emission Benchmarks (BEBs) and benchmarked emissions for the proposed development are presented in Table 9.

Table 9: Benchmarked Building Emissions

Land Use Class	GFA (m²)	BEB (g NOx/m²/annum)	Benchmarked Emissions (kg NOx/annum)
Commercial (assume A1)	410	22.6	9.3
Residential (C3)	1,158	26.2	30.3
Total Benchmarked Emission	39.6		

Building-related emissions for the proposed development are presented in Table 10 and have been derived from the anticipated energy usage (gas) for the site and the London Atmospheric Emissions Inventory (LAEI) default NOx emission factor for domestic and commercial land-uses as specified in the PSD.

Table 10: Development Building Emissions

Land Use Class	Energy Usage (kWh/annum)	Emission Factor (kg NOx/kWh)	Building Emissions (kg NOx/annum)
Commercial	1,053	0.000194	0.2
Domestic	57,434	0.0000785	4.5
Total Building Emission	4.7		

The annual building NOx emission for the proposed development is below the benchmarked emission; therefore, the proposed development is Air Quality Neutral with respect to building-related emissions.



²⁷ Air Quality Neutral Planning Support Update, GLA 80371, April 2014

MITIGATION

The following mitigation measures will be required during the construction and operational phases to minimise the air quality impacts arising from the development.

CONSTRUCTION PHASE

London Best Practice Guidance for dust control will be implemented, as appropriate, during the construction phase through the Dust Management Plan (DMP) for the proposed development.

The risk of dust soiling and human health impacts from the site has been assessed as negligible from demolition activities and low from earthworks, construction and trackout, prior to mitigation. In accordance with the IAQM and Mayor of London guidance, it is therefore recommended that the 'highly recommended' measures detailed in Table 11 are incorporated into the DMP. The 'desirable' measures detailed in Table 12 should also be considered for inclusion.

The significance of dust impacts on nearby receptors following the implementation of appropriate and best practice mitigation is considered to be negligible.

Description	Mitigation Measure
General	 Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site Manager. Display the head or regional office contact information.
Site management	 Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken. Make the complaints log available to the local authority when asked. Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the log book.
Monitoring	 Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the local authority when asked. Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.
Preparing and maintaining the site	 Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible. Erect solid screens or barriers around dusty activities or at the site boundary that are at least as high as any stockpiles on site. Avoid site runoff of water or mud.
Operating vehicle/machinery and sustainable travel	 Ensure all on-road vehicles comply with the requirements of the London Low Emission Zone and the London NRMM standards, where applicable. Ensure all vehicles switch off engines when stationary - no idling vehicles. Avoid the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment where practicable. Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).

Table 11: Highly Recommended Mitigation Measures



	- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.
Operations	- Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate.
	- Use enclosed chutes and conveyors and covered skips.
	 Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.
	- Reuse and recycle waste to reduce dust from waste materials
Waste management	- Avoid bonfires and burning of waste materials

Table 12: Desirable Mitigation Measures

Description	Mitigation Measure
Duran entre a su dans interioren tilog	- Fully enclose the site or specific operations where there is a high potential for dust production and the site is active for an extensive period.
Preparing and maintaining the site	- Keep site fencing, barriers and scaffolding clean using wet methods.
	 Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site.
Operating vehicle/machinery and sustainable travel	- Impose and signpost a maximum-speed-limit of 10mph on surfaced haul routes and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).
	- Avoid scabbling (roughening of concrete surfaces) if possible.
Construction	 Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.
	 Regularly use a water-assisted dust sweeper on the access and local roads, as necessary, to remove any material tracked out of the site.
	- Avoid dry sweeping of large areas.
Trackout	 Ensure vehicles entering and leaving sites are securely covered to prevent escape of materials during transport.
	- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).



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Demolition	- Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).
Earthworks	 Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces. Use Hessian, mulches or tackifiers where it is not possible to re-vegetate or cover with topsoil.
	- Only remove secure covers in small areas during work and not all at once.
	- Avoid scabbling (roughening of concrete surfaces) if possible.
	 Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.
Construction	 Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.
	 For smaller supplies of fine powder materials ensure bags are sealed after use and stored appropriately to prevent dust.
	 Regularly use a water-assisted dust sweeper on the access and local roads, as necessary, to remove any material tracked out of the site.
	- Avoid dry sweeping of large areas.
Trackout	 Ensure vehicles entering and leaving sites are securely covered to prevent escape of materials during transport.
	 Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).

OPERATIONAL PHASE

The proposed development will include secure cycle spaces to encourage sustainable transport.

Dispersion modelling of existing traffic on the local road network indicates that annual concentrations of NO_2 may exceed the air quality objective of 40 µg/m³ at the ground and first-floor of the proposed development. Mechanical Ventilation with Heat Recovery (MVHR) will be installed throughout the development, however it is recommended that NOx filtration is included at first-floor level to protect future residential occupants from poor air quality. NOx Filtration will not be required at ground-floor level where public exposure will be short-term.



SUMMARY AND CONCLUSIONS

The following summarise the outcomes of the assessment and provide details of any air quality constraints to the development of the site. Based on the results of the assessment, it is considered that redevelopment of the site would not cause a significant impact on local air quality.

An assessment has been undertaken to assess the potential impacts on local air quality associated with the construction and operation of the proposed development.

An assessment of the potential impacts during the construction phase has been carried out in accordance with the latest Institute of Air Quality Management guidance; this has shown that releases of dust and PM_{10} are likely to occur during site activities. However, through good site practice and the implementation of suitable mitigation measures, the impact of dust and PM_{10} releases may be effectively mitigated and the resultant impacts are considered to be negligible.

Traffic associated with the proposed development during the operational phase is not anticipated to significantly affect local air quality. However, dispersion modelling has been undertaken to predict concentrations of NO₂, PM₁₀ and PM_{2.5} at the proposed development site to determine whether mitigation will be required to protect future occupants from poor air quality. The predicted particulate concentrations are well within the relevant air quality standards, however an exceedance of the annual mean NO₂ objective is predicted at ground and first-floor level . Mechanical ventilation with NOx filtration has therefore been recommended for the first floor residential dwellings to minimise exposure to poor air quality. The dispersion modelling indicates that there will not be an exceedance of the short-term air quality objective on site and therefore NOx filtration will not be required at ground-floor level which will be used for commercial and access purposes.

The boilers proposed for the site will comply with the NOx emission limits specified in the Mayor of London's Sustainable Design and Construction SPG. An air quality neutral assessment has been undertaken for building-related emissions, based on the likely gas usage at the site. The development has been assessed as Air Quality Neutral.

Based on the results of the assessment, it is considered that air quality would not pose a constraint to the redevelopment of the site as proposed.



APPENDIX A – IAQM CONSTRUCTION DUST METHODOLOGY

Factors defining the sensitivity of a receptor to dust impacts are presented in Table A1.

Table A1: Receptor Sensitivity

Receptor Sensitivity	Human Health	Dust Soiling	Ecological
High	 Locations where members of the public are exposed over a time period relevant to the air quality objectives for PM₁₀ (a) Examples include residential dwellings, hospitals, schools and residential care homes. 	 Regular exposure High level of amenity expected. Appearance, aesthetics or value of the property would be affected by dust soiling. Examples include residential dwellings, museums, medium and long-term car parks and car showrooms. 	 Nationally or Internationally designated site with dust sensitive features (b) Locations with vascular species (c)
Medium	 Locations where workers are exposed over a time period relevant to the air quality objectives for PM₁₀ (a) Examples include office and shop workers (d) 	 Short-term exposure Moderate level of amenity expected Possible diminished appearance or aesthetics of property due to dust soiling Examples include parks and places of work 	 Nationally designated site with dust sensitive features (b) Nationally designated site with a particularly important plant species where dust sensitivity is unknown
Low	 Transient human exposure Examples include public footpaths, playing fields, parks and shopping streets 	 Transient exposure Enjoyment of amenity not expected. Appearance and aesthetics of property unaffected Examples include playing fields, farmland (e), footpaths, short-term car parks and roads 	 Locally designated site with dust sensitive features (b)

a) In the case of the 24-hour objective, a relevant location would be one where individuals may be exposed for eight hours or more in a day.

b) Ecosystems that are particularly sensitive to dust deposition include lichens and acid heathland (for alkaline dust, such as concrete).

c) Cheffing C. M. & Farrell L. (Editors) (2005), The Vascular Plant. Red Data List for Great Britain, Joint Nature Conservation Committee.

d) Does not include workers' exposure to PM_{10} as protection is covered by Health and Safety at Work legislation.

e) Except commercially sensitive horticulture.



The sensitivity of the area is dependent on the number of receptors within each sensitivity class and their distance from the source. Human health impacts are also dependent on the existing PM_{10} concentrations in the area.

Table A2 and Table A3 summarise the criteria for determining the overall sensitivity of the area to dust soiling and health impacts respectively. The sensitivity of the area to ecological impacts is presented in Table A4.

Receptor	Number of Receptors	Distance from the Source				
Sensitivity		< 20 m	<50m	<100m	<350m	
	>100	High	High	Medium	Low	
High	10-100	High	Medium	Low	Low	
	1-10	Medium	Low	Low	Low	
Medium	>1	Medium	Low	Low	Low	
Low	>1	Low	Low	Low	Low	

Table A2: Sensitivity of the Area to Dust Soiling Effects on People and Property

Table AD.	Concitivity	of the Area	to Lloalth	Impacts from Duct
I dule AS.	Sensitivity	of the Area	ю пеани	Impacts from Dust

Receptor	Annual Mean PM ₁₀ Concentration (μg/m³)	Number of	Distance from the Source				
Sensitivity		Receptors	<20m	<50m	<100m	<200m	<350m
		>100	High	High	High	Medium	Low
	>32	10-100	High	High	Medium	Low	Low
		1-10	High	Medium	Low	Low	Low
		>100	High	High	Medium	Low	Low
	28-32	10-100	High	Medium	Low	Low	Low
High		1-10	High	Medium	Low	Low	Low
підп		>100	High	Medium	Low	Low	Low
	24-28	10-100	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
		>100	Medium	Low	Low	Low	Low
	<24	10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	>32	>10	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	28-32	>10	Medium	Low	Low	Low	Low
Medium		1-10	Low	Low	Low	Low	Low
Wedlulli	24-28	>10	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	<24	>10	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Low	-	≥1	Low	Low	Low	Low	Low



Desember Constitution	Distance from the Source			
Receptor Sensitivity	<20m	<50m		
High	High	Medium		
Medium	Medium	Low		
Low	Low	Low		

Table A4: Sensitivity of the Area to Ecological Impacts from Dust

The magnitude of the dust impacts for demolition, earthworks, construction and trackout is classified as small, medium or large depending on the scale of the proposed works as detailed in Table A5.

Table A5: Dust Emission Magnitude

Receptor Sensitivity	Large	Medium	Small
Demolition	 Total building volume >50,000m³ Potentially dusty material (e.g. concrete) Onsite crushing and screening Demolition activities >20m above ground level. 	 Total building volume 20,000 - 50,000m³ Potentially dusty material Demolition activities 10 - 20m above ground level. 	 Total building volume <20,000m³ Construction material with low potential for dust release Demolition activities <10m above ground level Demolition during wetter months
Earthworks	 Total site area >10,000m² Potentially dusty soil type (e.g. clay) >10 heavy earth moving vehicles active at any one time Formation of bunds >8m in height Total material moved >100,000 tonnes 	 Total site area 2,500 - 10,000m² Moderately dusty soil type (e.g. silt) 10 heavy earth moving vehicles active at any one time Formation of bunds 4 - 8m in height Total material moved 20,000 - 100,000 tonnes 	 Total site area <2,500m² Soil type with large grain size (e.g. sand) <5 heavy earth moving vehicles active at any one time Formation of bunds <4m in height Total material moved <20,000 tonnes Earthworks during wetter months
Construction	 Total building volume >100,000m³ On site concrete batching Sandblasting >50 HGV movements in any one day (a) 	 Total building volume 25,000 - 100,000m³ Potentially dusty construction material (e.g. concrete) On site concrete batching 10 - 50 HGV movements in any one day (a) 	 Total building volume <25,000m³ Material with low potential for dust release (e.g. metal cladding or timber <10 HGV movements in any one day (a)
Trackout	 Potentially dusty surface material (e.g. high clay content) Unpaved road length >100m 	 Moderately dusty surface material (e.g. silt) Unpaved road length 50 - 100m 	 Surface material with low potential for dust release



AIR QUALITY ASSESSMENT

			-	Unpaved road length <50m
a) HGV movem	ents refer to outward trips (leaving the	site) by vehicles of over 3.5 tonnes		

For each dust emission source, the worst-case area sensitivity is used in combination with the dust emission magnitude to determine the risk of dust impacts prior to mitigation as illustrated in Tables A6, A7 and A8.

Table A6: Risk of Dust Impacts from Demolition

Area Canaitivity	Dust Emission Magnitude				
Area Sensitivity	Large	Medium	Small		
High	High Risk	Medium Risk	Medium Risk		
Medium	High Risk	Medium Risk	Low Risk		
Low	Medium Risk	Low Risk	Negligible Risk		

Table A7: Risk of Dust Impacts from Earthworks and Construction

Area Sensitivity	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible Risk

Table A8: Risk of Dust Impacts from Trackout

Area Sensitivity	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Low Risk	Negligible Risk
Low	Low Risk	Low Risk	Negligible Risk



APPENDIX B – ADMS-ROADS INPUT PARAMETERS

Table B1: Summary of ADMS-Roads Input Parameters

Parameter	Value
ADMS-Roads Model Version	4.1
Vehicle Emission Factors	EFT v8.0.1 for 2016
Meteorological Data	Hourly sequential data from London City Airport (2016)
Surface Roughness	1.0m
Monin-Obukhov Length	75m

Table B2: Summary of Traffic Data

	Baseline		
Road Link	AADT	HGV (%), including buses and coaches	Average Speed (kph)
Kentish Town Road (a)	14,161 (DfT 17001, 2016)	12.1%	16
Highbury Road	12,428 (DfT 930345, 2009)	8.9%	16
Fortess Road	15,927 (DfT 38562, 2016)	10.6%	16
(a) Street canyon effects have been included in the model, where appropriate.			



APPENDIX C – MODEL VERIFICATION

Most nitrogen dioxide (NO_2) is produced in the atmosphere by the reaction of nitric oxide (NO) with ozone. It is therefore most appropriate to verify the model in terms of primary pollutant emissions. Verification of concentrations predicted by the ADMS-Roads model has followed the methodology presented in LAQM.TG16.

Predicted annual mean NO_2 concentrations have been compared with the 2016 annual mean concentrations measured by diffusion tube CA16 on Kentish Town Road.

The measured NO_2 concentration has been converted into an equivalent measured Road-NOx (i.e. the component of total NOx coming from road traffic) concentrations using the Defra NOx from NO_2 calculator.

The ratio of the measured and modelled Road-NOx contributions provides an adjustment factor for the modelled Road-NOx concentrations. This factor is then applied to the modelled road NOx concentrations, before they are converted to Road-NO₂ using the Defra NOx to NO₂ calculator and added to the background NO₂ concentration for to produce a total adjusted modelled NO₂ concentration.

The model verification calculation is presented in Table C1. In the absence of particulate monitoring data suitable for verification, the adjustment factor has also been applied to the modelled Road- PM_{10} and Road- $PM_{2.5}$ concentrations, in accordance with the guidance.

Table C1: Verification Calculation

Parameter	Value
Measured NO ₂ Concentration (2016)	58.7 μg/m³
Measured Road-NOx Concentration	59.3 μg/m³
Modelled Road-NOx Concentration	36.2 μg/m ³
Adjustment Factor	1.64



APPENDIX D – WIND ROSES

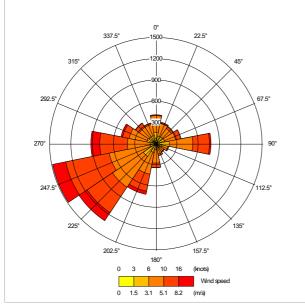


Figure D1: Wind Rose London City Airport 2015

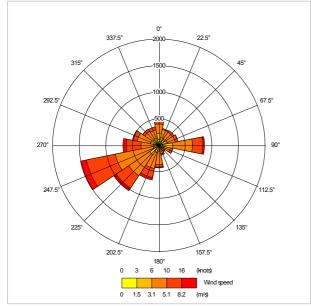


Figure D2: Wind Rose London City Airport 2016



AIR QUALITY ASSESSMENT

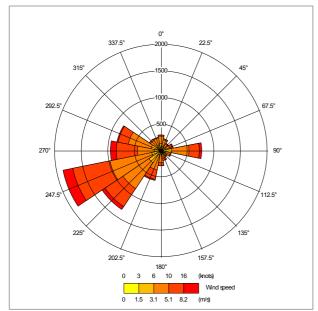


Figure D3: Wind Rose London City Airport 2017



XCO2 56 Kingsway Place, Sans Walk London EC1R OLU +44 (0)20 7700 1000 mail@xco2.com xco2.com

