

Nora-Andreea Constantinescu
The Planning Officer
London Borough of Camden
5 Pancras Square,
Kings Cross,
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Dear Ms Constantinescu

THE HALL SENIOR SCHOOL – PLANNING REFERENCE 2019/1325/P

Date 20/08/2019

AIR QUALITY PLANNING CONDITION

I am writing with regard to the suggested planning condition which is being proposed for the redevelopment works proposed for The Hall Senior School (the application site). The reasoning given by Camden Council behind the condition and the resulting planning condition is as follows:

“The AQA takes into consideration predictions of air quality improvements, which is contrary to CPG Air Quality section 3.5. As such, based on the current information the air quality exceeds the annual mean NO2 objective on the western half of the school site, closest to Crossfield Road. As such, condition would be attached for:

1. *Prior to commencement of development excluding demolition and site preparation works, full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads and the boiler stack and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.*

Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy 7.14.”

An air quality assessment was undertaken by Ramboll UK Ltd (Report reference R1620007106) and submitted as part of the planning application. The main aim of the assessment was to determine whether air quality at the application site would meet relevant health-based air quality objectives so as to determine

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whether mitigation in the form of mechanical ventilation with filtration would be required to protect staff and children from poor air quality.

The assessment presented both monitored and predicted long term concentrations of pollutants and concluded that air quality would be expected to meet all relevant objectives at the application site.

This conclusion was further strengthened by the argument that air quality is expected to gradually improve both as a result of the gradual renewal of the vehicle fleet with cleaner vehicles and from the initiatives introduced throughout London and by Camden Council. This is clearly demonstrated by information presented in Figure 9 of the latest Camden Air Quality Action Plan¹ provided in Appendix 1 which demonstrates that pollutant emissions within Camden are predicted to significantly decrease between 2013 and 2020.

However, the response from the council indicates that current Camden Planning Guidance states that no allowance should be taken of this gradual improvement and that the need for mitigation should be determined on the basis of the existing air quality. It appears that the council has requested the condition on the basis of the 2016 London Atmospheric Emissions Inventory (LAEI) predicted concentrations given within the Air Quality Assessment Report at Figure 3.3. These are predicted modelled concentrations which have been verified against 2016 monitored concentrations.

The assessment also presented monitored data at nearby monitoring stations. This included data for 2017, 2018 and 2019 to date. Data was presented for a number of stations including those at Swiss Cottage adjacent to the main road network and data for Arsenal which is considered more representative of the application conditions. This monitored data demonstrates that whilst there are exceedances close to the main road network, concentrations decline away from the roadside and comfortably meet the air quality objective of 40 µg/m³ at locations similar to The Hall School site. Furthermore, the data demonstrates a steady reduction in concentrations at the monitoring sites and in particular at the Swiss Cottage site. This is further demonstrated in evidence from the Camden Air Quality Action Plan presented in Appendix 2 which indicates that across Camden there has been a steady decline in concentrations at all automatic monitoring sites within its area.

From the monitored evidence, it is considered that the predicted figures presented for 2016 by the LAEI are an over estimate of existing air quality at The Hall School site for 2019, and current air quality would be expected to meet all relevant air quality objectives across the application site. Therefore, the need for a mechanical ventilation system to protect staff and pupils from poor air quality is not required and the condition should not be included within the planning consent.

Yours sincerely



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¹ London Borough of Camden, Camden's Clean Air Action Plan 2019 - 2022

Encl. Appendix 1, NO₂ Emissions by Source and Vehicle Type (From the LAEI 2016)
 Appendix 2, Annual Mean NO₂ Concentrations at Camden Automatic Monitoring Sites
 2010 to 2017

Appendix 1

NO₂ Emissions by Source and Vehicle Type (From the LAEI 2016)

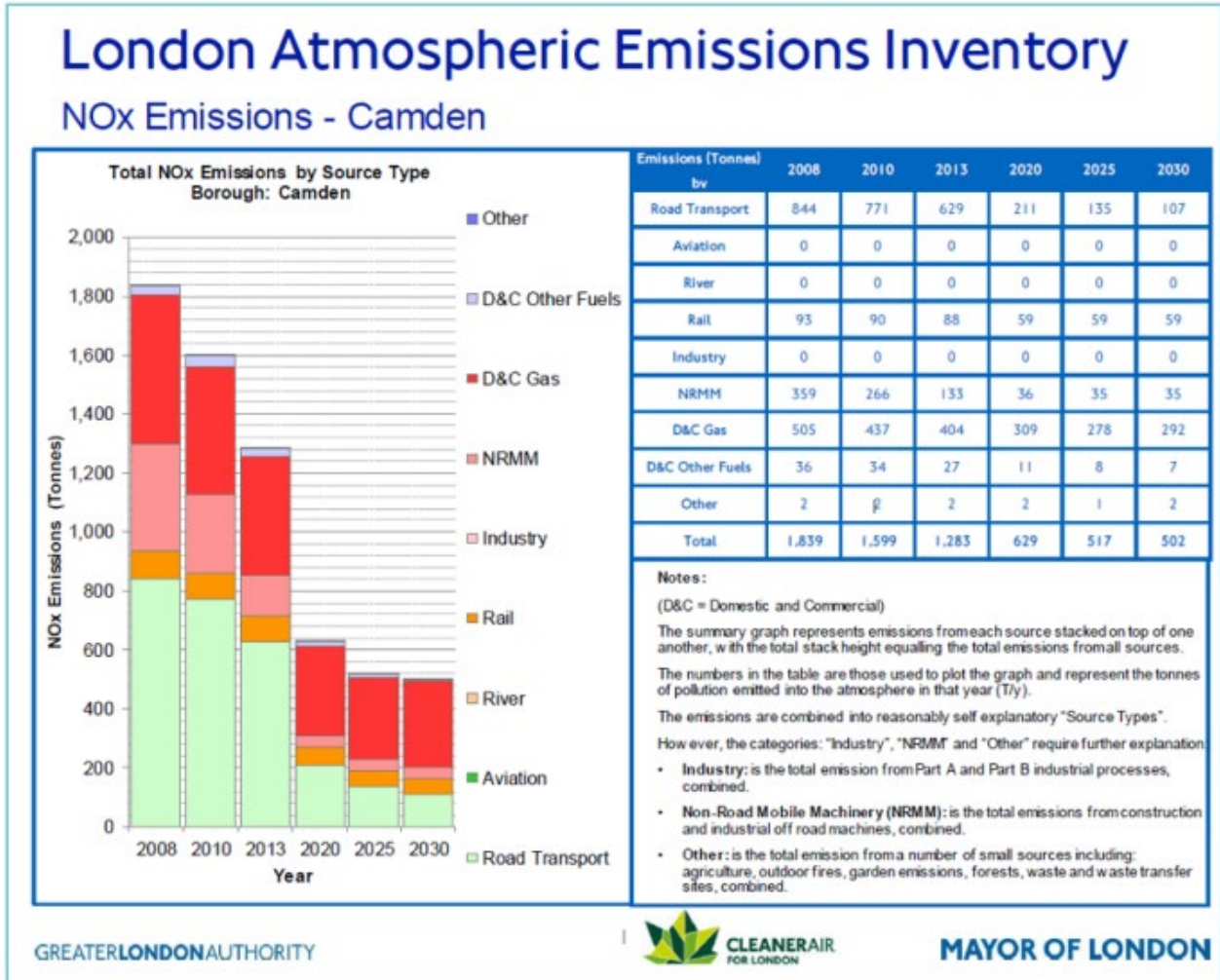
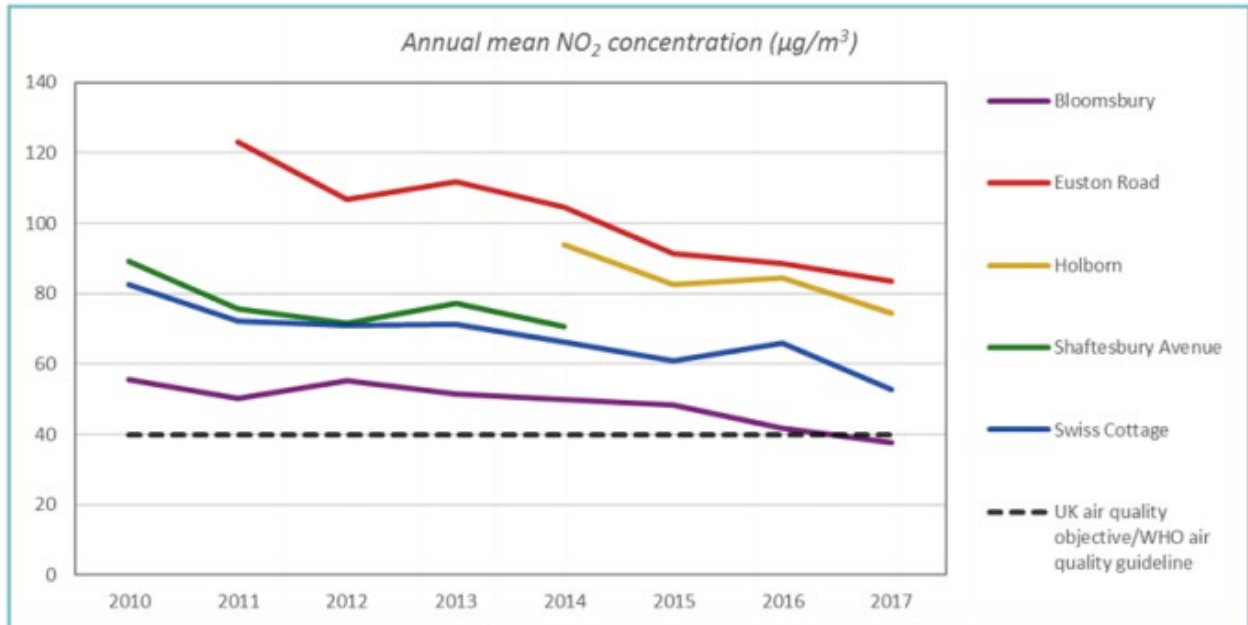


FIGURE 9 NO_x EMISSIONS BY SOURCE AND VEHICLE TYPE (FROM THE LAEI 2016)

Source: Camden's Clean Air Action Plan 2019-2022

Appendix 2

Annual Mean NO₂ Concentrations at Camden Automatic Monitoring Sites 2010 to 2017



GRAPH 1: ANNUAL MEAN NO₂ CONCENTRATIONS

Source: Camden's Clean Air Action Plan 2019-2022