Air Quality Assessment

88 & 100 Gray's Inn Road and
127 Clerkenwell Road, Camden

Report Ref: AQ2205

September 2022

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Title:

88 & 100 Gray's Inn Road and 127 Clerkenwell Road, Camden:
Air Quality Assessment

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1 INTRODUCTION

1.1 Scope

GEM Air Quality Ltd has been commissioned to undertake a detailed air quality assessment based on the potential impacts of a proposed development located at 88 & 100 Gray's Inn Road and 127 Clerkenwell Road in Camden, London.

The pollutants modelled as part of this assessment are nitrogen oxides (NOx) and particulate matter (PM_{10}).

The impacts of vehicle emissions have been assessed using the techniques detailed within Volume 11, Section 3 of the Design Manual for Roads and Bridges (DMRB)[1] and the London Local Air Quality Management Technical Guidance (LLAQM.TG16)[2]. The impact of road traffic emissions will be assessed using the ADMS-Roads air dispersion model. This model has been devised by Cambridge Environmental Research Consultants (CERC) and is described as a "*comprehensive tool for investigating air pollution problems due to small networks of roads*".

It should be noted that the short-term impacts of NO_2 and PM_{10} emissions have not been modelled as dispersion models are inevitably poor at predicting short-term peaks in pollutant concentrations, which are highly variable from year to year, and from site to site. Notwithstanding this, general assumptions have been made about short term concentrations based on the modelled annual mean concentrations.

In addition to this, the assessment has also assessed the potential impact on local air quality from demolition and construction activities at the site. The construction impact assessment relates only to 100 Gray's Inn Road and 127 Clerkenwell Road as 88 Gray's Inn Road will be refurbished with internal modifications to the existing structure.

An air quality neutral assessment has also been undertaken relating to the proposed building and transport emissions.

[1] Design Manual for Roads and Bridges, Vo 11, Section 3, Part 1 – HA207/07, Highways Agency, May 2007

[2] London Local Air Quality Management (LLAQM), Technical Guidance, October 2019 (LLAQM.TG(19))

2 Pollutants & Legislation

2.1 Pollutant Overview

In most urban areas of the UK, traffic generated pollutants have become the most common pollutants. These are nitrogen dioxide (NO_2), fine particulates (PM_{10}), carbon monoxide (CO), 1,3-butadiene and benzene, as well as carbon dioxide (CO_2). This air quality assessment focuses on NO_2 and PM_{10}, as these pollutants are least likely to meet their Air Quality Strategy objectives near roads. Table 1 provides an overview of NO_2 and PM_{10}.

Table 1 – Overview of NO_2 and PM_{10}

Pollutant	Properties	Anthropogenic Sources	Natural Sources	Potential Effects
Particles (PM_{10})	Tiny particulates of solid or liquid nature suspended in the air	Road transport; Power generation plants; Production processes e.g. windblown dust	Soil erosion; Volcanoes; Forest fires; Sea salt crystals	Asthma; Lung cancer; Cardiovascular problems
Nitrogen Dioxide (NO_2)	Reddish-brown coloured gas with a distinct odour	Road transport; Power generation plants; Fossil fuels – extraction & distribution; Petroleum refining	No natural sources, although nitric oxide (NO) can form in soils	Pulmonary edema; Various environmental impacts e.g. acid rain

2.2 Air Quality Strategy

The UK Government and the devolved administrations published the latest Air Quality Strategy for England, Scotland, Wales and Northern Ireland on 17 July 2007[3]. The Strategy provides an over-arching strategic framework for air quality management in the UK.

With regards to this assessment, the Air Quality Strategy contains national air quality standards and objectives established by the Government to protect human health. The objectives for nitrogen dioxide and particulates (PM_{10} and $PM_{2.5}$) have been set, along with seven other pollutants (benzene, 1,3-butadiene, carbon monoxide, lead, PAHs, sulphur dioxide and ozone). Those which are limit values required by EU Daughter Directives on Air Quality have been transposed into UK law through the Air Quality Standards (Amendment) Regulations 2016, which came into force on 31st December 2016. Table 2 provides the UK Air Quality Objectives for NO_2 and PM_{10}.

[3] 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

Table 2 – UK Air Quality Objectives for Nitrogen Dioxide and Particulate Matter

Pollutant	Objective	Concentration measured as	Obligation
Particles (PM_{10})	50µg/m^3 not to be exceeded more than 35 times a year	24 hour mean	All local authorities
	50µg/m^3 not to be exceeded more than 7 times a year	24 hour mean	Scotland only
	40µg/m^3	Annual mean	All local authorities
	10µg/m^3	Annual mean	Scotland only
Particles ($PM_{2.5}$)	25µg/m^3	Annual Mean	England only (encouraged in Wales)
	10µg/m^3	Annual Mean	Scotland only
Nitrogen Dioxide (NO_2)	200µg/m^3 not to be exceeded more than 18 times a year	1 hour mean	All local authorities
	40µg/m^3	Annual mean	All local authorities

2.3 Clean Air Strategy

The Clean Air Strategy[4] was published in January 2019 and sets out the comprehensive action that is required from across all parts of government and society to tackle all sources of air pollution. New legislation will create a stronger and more coherent framework for action to tackle air pollution. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms.

2.4 London Local Air Quality Management (LLAQM)

At the core of LLAQM delivery are three pollutant objectives; these are: nitrogen dioxide (NO_2), particulate matter (PM_{10}) and sulphur dioxide (SO_2). All current Air Quality Management Areas (AQMAs) across the UK are declared for one or more of these pollutants, with NO_2 accounting for the majority. In Greater London, AQMAs are declared for NO_2 and PM_{10} in equal proportions. It is a statutory requirement for local authorities to regularly review and assess air quality in their area and take action to improve air quality when objectives set out in regulation cannot be met.

4 Clean Air Strategy 2019, Department for Environment, Food and Rural Affairs, January 2019

2.4.1 London Borough of Camden

The Council has declared an Air Quality Management Area (AQMA), which incorporates the whole Borough. As such, the proposed development lies within this AQMA. The AQMA has been declared for NO_2 and PM_{10} from road transport emissions.

The proposed development is not located within an Air Quality Focus Area.

3 Planning Policy & Guidance

3.1 National Planning Policy & Guidance

3.1.1 National Planning Policy Framework

On a national level, air quality can be a material consideration in planning decisions. The updated National Planning Policy Framework (NPPF) for England, released in July 2021, is considered a key part of the Governments reforms to make the planning system less complex and more accessible, to protect the environment and to promote sustainable growth.

Paragraph 105 within the NPPF states that the "*The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making*".

It goes on to state in paragraph 186 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 impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan*".

3.1.2 Planning Practice Guidance (PPG)

The NPPF is supported by the national Planning Practice Guidance (PPG), which includes guiding principles on how planning can take account of the impacts of new development on air quality (updated November 2019). The PPG states that "*Defra carries out an annual national assessment of air quality using modelling and monitoring to determine compliance with EU Limit Values*" and "*It is important that the potential impact of new development on air quality is taken into account where the national assessment indicates that relevant limits have been exceeded or are near the limit*". The role of the local authorities is covered by the LAQM regime, with the PPG stating that local authority Air Quality Action Plans "*identify measures that will be introduced in pursuit of the objectives*". The PPG makes clear that "*Odour and dust can also be a planning concern, for example, because of the effect on local amenity*".

The PPG also states that "*Whether air quality is relevant to a planning decision will depend on the proposed development and its location. Concerns could arise if the development is likely to have an adverse effect on air quality in areas where it is already known to be poor, particularly if it could affect the implementation of air quality strategies and action plans and/or breach legal obligations (including those relating to the conservation of habitats and species). Air quality may also be a material consideration if the proposed development would be particularly sensitive to poor air quality in its vicinity*".

The PPG sets out the information that may be required in an air quality assessment, making clear that "*Assessments need to be proportionate to the nature and scale of development proposed and the potential impacts (taking into account existing air quality conditions), and because of this are likely to be locationally specific".* It also provides guidance on options for mitigating air quality impacts, as well as examples of the types of measures to be considered. It makes clear that *"Mitigation options will need to be locationally specific, will depend on the proposed development and need to be proportionate to the likely impact*".

3.1.3 Land-Use Planning & Development Control

In January 2017, Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) produced guidance to ensure that air quality is adequately considered in the land-use planning and development control processes[5].

The guidance document is particularly applicable to assessing the effect of changes in exposure of members of the public resulting from residential and mixed-use developments, especially those within urban areas where air quality is poorer. It is also relevant to other forms of development where a proposal could affect local air quality and for which no other guidance exists.

3.2 Regional Planning Policy

3.2.1 London Environment Strategy

The Mayor's London Environment Strategy[6], published in May 2018, contains a comprehensive list of measures to improve air quality. The aim is "*for London to have the best air quality of any major world city by 2050, going beyond legal requirements to protect human health and minimise inequalities*".

The strategy includes setting new targets for $PM_{2.5}$ with the aim of meeting World Health Organization (WHO) guidelines by 2030, the establishment of zero emission zones from 2020, the introduction of an air quality positive development, the phasing out the use of fossil fuels

5 Land-Use Planning & 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 processes. EPUK & IAQM. January 2018

6 London Environment Strategy. Mayor of London. May 2018

to heat, cool and maintain London's buildings and the introduction of a low emission zone for non-road mobile machinery (NRMM).

3.2.2 The London Plan

The most recent London Plan was published in March 2021. Policy SI1 relates specifically to air quality and states the following:

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

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

1) Development proposals should not:

a. lead to further deterioration of existing poor air quality

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

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

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

a. Development proposals must be at least air quality neutral

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

c. Major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1

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

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

a. How proposals have considered ways to maximise benefits to local air quality, and

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

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

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

3.2.3 Supplementary Planning Guidance (SPG)

Control of Dust and Emissions during Construction and Demolition SPG

The Greater London Authority (GLA) released the "Control of Dust and Emissions during Construction and Demolition" SPG in July 2014[7]. The guidance seeks to reduce emissions of dust and PM_{10} from construction and demolition activities in London. It also aims to manage emissions of nitrogen oxides (NOx) from construction and demolition machinery. The SPG:

- Provides more detailed guidance on the implementation of all relevant policies in the London Plan and the Mayor's Air Quality Strategy to neighbourhoods, boroughs, developers, architects, consultants and any other parties involved in any aspect of the demolition and construction process;
- Sets out the methodology for assessing the air quality impacts of construction and demolition in London; and
- Identifies good practice for mitigating and managing air quality impacts that is relevant and achievable, with the overarching aim of protecting public health and the environment.

[7] The Control of Dust and Emissions during Construction and Demolition SPG. Greater London Authority, July 2014

The principles of the SPG apply to all developments in London as their associated construction and demolition activity may all contribute to poor air quality unless properly managed and mitigated.

Sustainable Design and Construction SPG

The Greater London Authority (GLA) released the "Sustainable Design and Construction" SPG in July 2014[8]. The SPG aims to support developers, local planning authorities and neighbourhoods to achieve sustainable development. It provides guidance on to how to achieve the London Plan objectives effectively, supporting the Mayor's aims for growth, including the delivery of housing and infrastructure.

[8] Sustainable Design and Construction SPG. Greater London Authority, July 2014

4 Assessment Methodology

4.1 Construction Phase

Based on the "Control of Dust and Emissions during Construction and Demolition" SPG discussed in the previous section, the main air quality impacts that may arise during construction activities are:

- Dust deposition, resulting in the soiling of surfaces;
- Visible dust plumes, which are evidence of dust emissions;
- Elevated PM_{10} concentrations, as a result of dust generating activities on site; and
- An increase in concentrations or airborne particles and nitrogen dioxide due to exhaust emissions from diesel powered vehicles and equipment on site.

In relation to the most likely impacts, the guidance states the following:

"The most common impacts are dust soiling and increased ambient PM_{10} concentrations due to dust arising from activities on the site. Dust soiling will arise from the deposition of particulate matter in all size fractions.

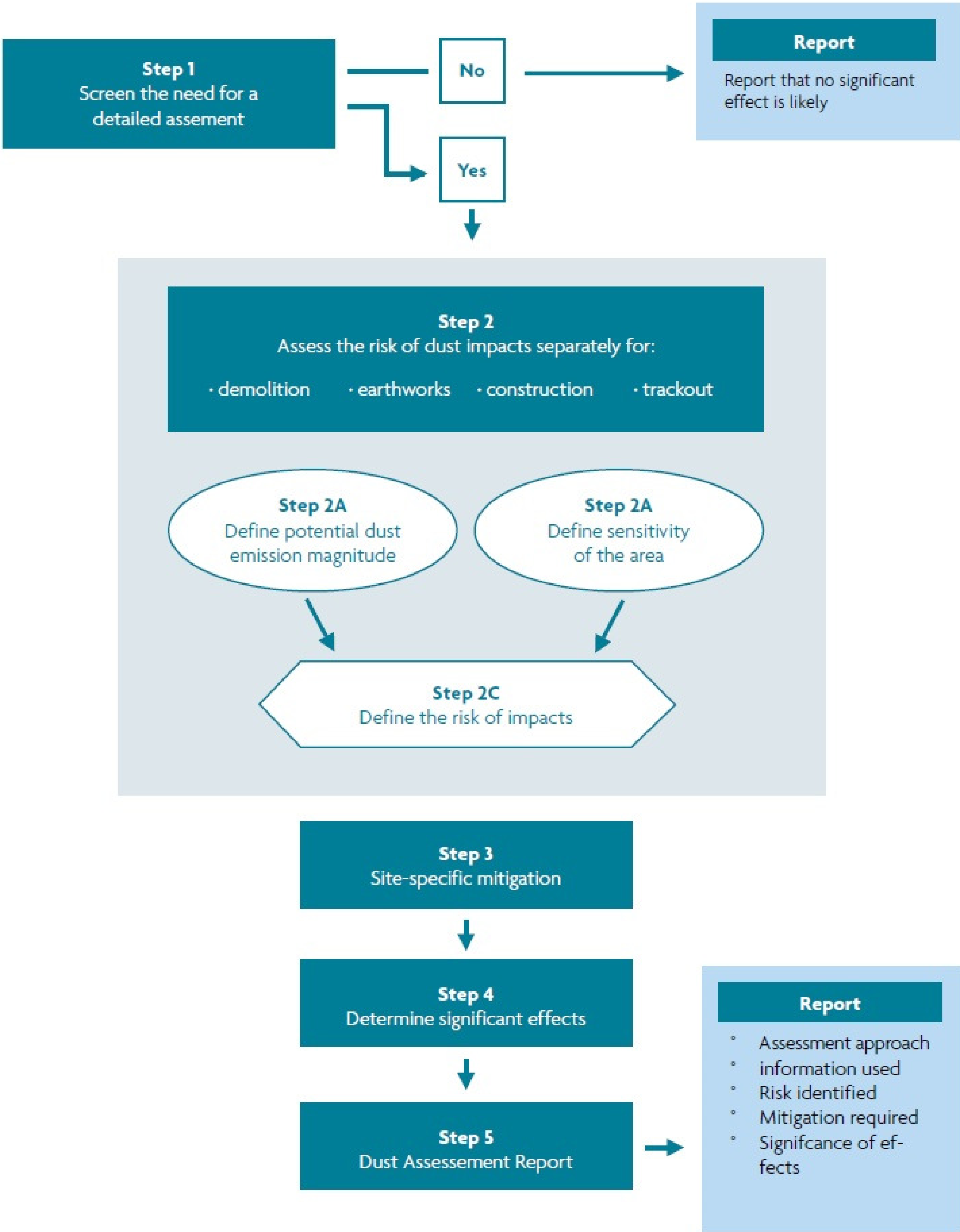
Experience of assessing the exhaust emissions from on-site plant (also known as non-road mobile machinery or NRMM) and site traffic suggests that they are unlikely to make a significant impact on local air quality, and in the vast majority of cases they will not need to be quantitatively assessed".

The guidance continues by providing an assessment procedure. This includes sub-dividing construction activities into four types to reflect their different potential impacts. These are as follows:

- Demolition;
- Earthworks;
- Construction; and
- Track out.

With regards to the proposed development the potential for dust emissions is assessed for each activity that is likely to take place. The assessment procedure assumes no mitigation measures are applied. The conditions with no mitigation thus form the baseline or "do-nothing" situation for a construction site. The assessment procedure uses the steps provided in the guidance and summarised in Figure 1.

Figure 1 – Dust Assessment Procedure



4.2 Operational Phase (Traffic Emissions)

4.2.1 Modelled Scenarios

Two scenarios have been modelled as part of this assessment. These are as follows:

- **Scenario 1 (2019)** – existing levels of air quality / model verification; and
- **Scenario 2 (2027)** – future impact of traffic emissions on the proposed development i.e. introduction of new exposure.

Air quality monitoring data recorded throughout 2020 and 2021 is not considered suitable for model verification due to the impact of the Covid-19 pandemic on local traffic movements. As such, Scenario 1 has utilised a baseline year of 2019 to reflect the most recent, pre-pandemic air quality monitoring data available from the Council.

A future year has been chosen (2027) representing an additional 5 years from the date this report was written. This will provide an assessment of the future impact of traffic emissions on the proposed development once completed and fully occupied.

4.2.2 ADMS-Roads

Modelling the impact of traffic emissions on the proposed development will be undertaken using the latest version of the ADMS-Roads model[9]. ADMS-Roads is significantly more advanced than that of most other air dispersion models in that it incorporates the latest understanding of the boundary layer structure, and goes beyond the simplistic Pasquill-Gifford stability categories method with explicit calculation of important parameters. The model uses advanced algorithms for the height-dependence of wind speed, turbulence and stability to produce improved predictions.

4.2.3 Emission Factors

Defra and the Devolved Administrations have provided an updated Emission Factors Toolkit (Version 11.0) which incorporates updated NOx emissions factors and vehicle fleet information[10]. These emission factors have been integrated into the latest ADMS-Roads modelling software.

The Institute for Air Quality Management (IAQM) released a position statement in July 2018 relating to uncertainties in vehicle NOx emissions within air quality assessments. It states the following:

"It has been known since around 2011 that nitrogen oxides (NOx) emissions from diesel vehicles have not declined as expected despite the introduction of increasingly more stringent European Union (EU) emission limits since the early 1990s. This, together with an increase in

9 Model Version: 5.0.1.3. Interface Version 5.0.1.7065 (31/01/2022)

10 https://laqm.defra.gov.uk/wp-content/uploads/2021/11/EFT2021_v11.0.xlsb

numbers of diesel cars and the use of emission control devices that increase the proportion of the nitrogen dioxide (NO_2) in the exhaust NOx, has resulted in annual mean concentrations of NO_2 remaining high, particularly at roadside locations".

However, the IAQM position statement has now been withdrawn and the following statement has been published by the IAQM:

"*There is a growing body of evidence to suggest that the latest COPERT vehicle emission factors, which feed into the EFT (v9 and onwards), reflect the real-world NOx emissions more accurately.*

It is judged that an exclusively vehicle emissions-based sensitivity test is no longer necessary.

On this basis, the EFT may be used for future year modelling with greater confidence when considering the per vehicle emission, provided that the assessment is verified against measurements made in the year 2016 or later".

On this basis, Scenario 2 has also been modelled with vehicle emission factors for 2027 derived from the latest Emission Factors Toolkit.

4.2.4 Traffic Data

Baseline flows along the local road are available from the Department for Transport (DfT)[11]. Baseline data has been projected to 2027. Projection of traffic data has been undertaken using growth factors specific to the London Borough of Camden, obtained from TEMPro[12]. The projected flow rates are provided in Table 3. It is assumed that the percentage HDV and speed will remain unchanged in future years. The A1 Aldersgate Street has been modelled for the purposes of model verification.

Modelled speeds have also been provided in Table 3. These are based on the London Atmospheric Emissions Inventory (LAEI)[13] data. However, where a link approaches a junction a speed of 20 kph has been modelled (or the speed provided in Table 3, whichever is lower) to represent queuing traffic at a junction.

11 http://www.dft.gov.uk/traffic-counts/
12 TEMPro (Trip End Model Presentation Program) version 7.2, Department for Transport
13 LAEI (2019), Greater London Authority

Table 3 – Annual Average Daily Traffic Flows, Percentage HDV and Speeds for Modelled Roads

Link Name	AADT 2019	AADT 2027	HDV (%)	Speed (kph)
A5200 Gray's Inn Road (South of Junction)	11,813	12,425	11.5%	18
A5200 Gray's Inn Road (North of Junction)	12,959	13,630	7.2%	24
A401 Theobalds Road	19,847	20,875	10.2%	16
A5201 Clerkenwell Road	11,705	12,311	9.8%	20
A401 Rosebery Avenue	10,112	10,636	16.9%	6
A4 Fetter Lane	13,020	13,694	6.0%	19

4.2.5 Street Canyons

A street canyon may be defined as a relatively narrow street with buildings on both sides, where the height of the buildings is generally greater than the width of the road. Street canyons may result in elevated pollutant concentrations from road traffic emissions due to a reduced likelihood of the pollutants becoming dispersed in the atmosphere. Street canyons have been modelled as part of this assessment along all modelled links.

4.3 Background Concentrations

Background NO_2, PM_{10} and $PM_{2.5}$ concentrations have been obtained from the Councils urban background monitoring site at Russell Square. Background concentrations derived from this site are provided in Table 4.

Table 4 – Background NOx, NO_2, PM_{10} and $PM_{2.5}$ Concentrations (2019)

Pollutant	X	Y	Bloomsbury Urban Background
NO_2	530123	182014	32.0
PM_{10}			18.0
$PM_{2.5}$			11.0

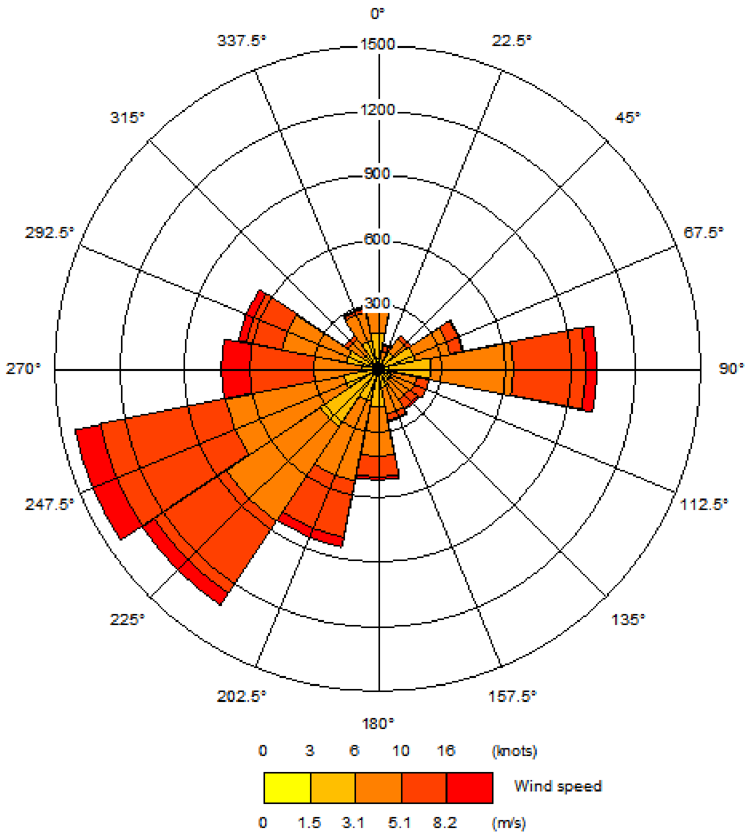
4.4 Surface Roughness

A surface roughness of 1.5 metre has been used in the model. This value is provided by ADMS-Roads as a typical roughness length for large urban areas. This value has been used across the modelled domain.

4.5 Meteorological Data

Hourly sequential meteorological data from the London City Airport meteorological station has been used. Wind speed and direction data from the London City Airport meteorological station has been plotted as a wind rose in Figure 2.

Figure 2 – Wind Speed and Direction Data, London City Airport (2019)



4.6 Model Output

4.6.1 NOx/NO_2 Relationship

The most NOx to NO_2 calculator[14] has been used to determine NO_2 concentrations for this assessment, based on predicted NOx concentrations using ADMS-Roads. Converted NO_2 concentrations are initially compared against local monitoring data to verify the model output. If the model performance is considered unacceptable then the NOx concentrations are adjusted before conversion to NO_2.

4.6.2 Predicted Short Term Concentrations

As discussed in the introduction, it has not been possible to model the short-term impacts of NO_2 and PM_{10}. Research[15] has indicated that the hourly NO_2 objective is unlikely to be exceeded at a roadside location where the annual mean NO_2 concentration is less than 60 µg/m^3. A concentration of 60 µg/m^3 has therefore been used to screen the likelihood of exceedance of the hourly mean NO_2 objective.

For PM_{10}, a relationship between the annual mean and the number of 24-hour mean exceedences has been devised and is as follows:

- No. 24-hour mean exceedences = -18.5 + 0.00145 x annual mean^3 + (206/annual mean)

This relationship has been applied to the modelled annual mean concentrations to estimate the number of 24-hourly exceedences.

4.6.3 Model Verification

Unfortunately, due to the location of the proposed development there are no roadside or kerbside monitoring sites within 700 m. Monitored NO_2 concentrations from the site listed in Table 5 has been used for the purposes of model verification. This is one the closest kerbside or roadside monitoring sites to the proposed development. The use of this site for model verification also means the Councils urban background monitoring at Bloomsbury can be used to cover both the proposed development and the model verification location.

Table 5 – Modelled Verification Locations

Monitoring ID	Location	X	Y	Height (m)
CA21	Bloomsbury Street	529962	181620	2.2

14 https://laqm.defra.gov.uk/documents/NOx_to_NO2_Calculator_v8.1.xlsm

15 Analysis of Relationship between 1-Hour and Annual Mean Nitrogen Dioxide at UK Roadside and Kerbside Monitoring Sites, Laxen and Marner, 2003

4.6.4 Receptor Locations

To assess the potential impact of the traffic emissions from the local road network, several receptors have been identified representing the different facades of the proposed development. The location of these receptors, together with their height above ground level is provided in Table 6 and represented in Figures 3 and 4.

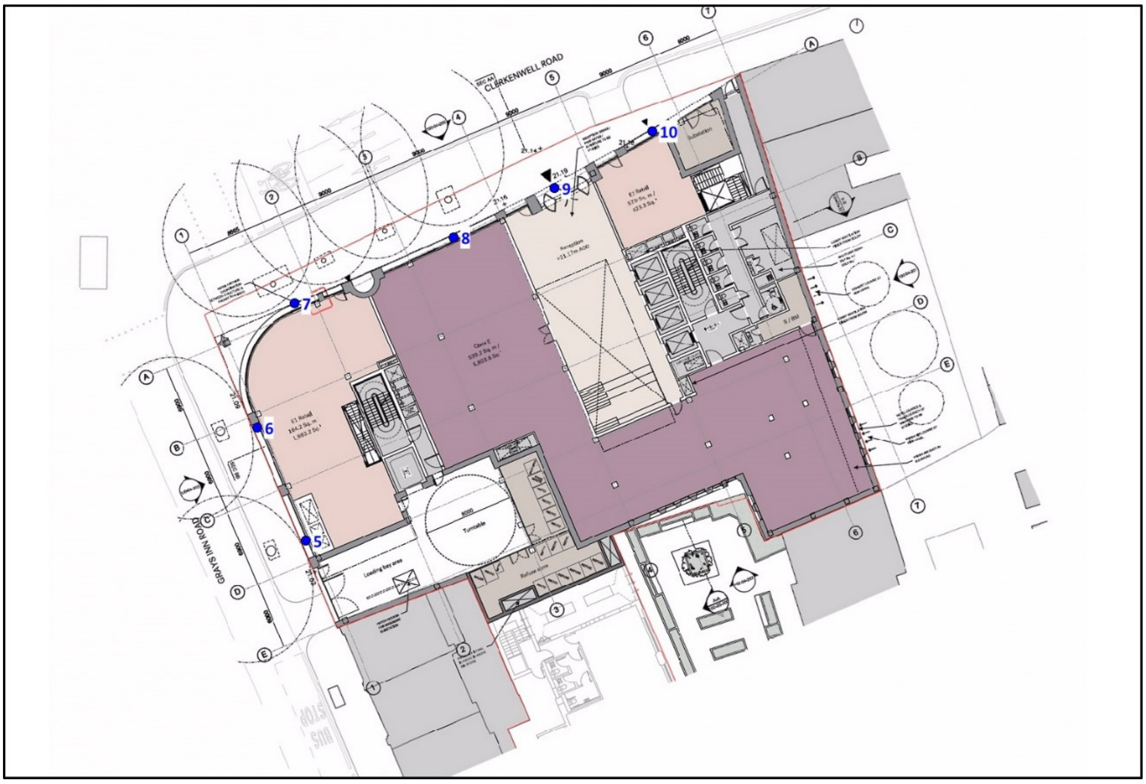
The proposed residential receptors have been separated from the proposed office building as residential receptors are considered relevant exposure to the annual mean air quality objectives. Predicted concentrations across the proposed office building are compared against the relevant short-term objectives. Only the ground floor of the office building has been modelled as this will provide a worst-case assessment across all floors for comparison against the short-term air quality objective.

Table 6 – Modelled Receptor Locations

AQA ID	X	Y	Height (m)	Description
Proposed Residential				
1	531044	181943	1.5, 4.5, 7.5 & 10.5	Proposed Ground to Third Floor
2	531035	181939		
3	531045	181914		
4	531055	181919		
Proposed Office Building				
5	531016	181948	1.5	Proposed Ground Floor
6	531011	181957		
7	531014	181968		
8	531028	181974		
9	531037	181979		
10	531045	181984		

Figure 3 – Modelled Receptor Locations (Residential)

Figure 4 – Modelled Receptor Locations (Commercial)



4.7 Significance Criteria

4.7.1 Construction Phase

The risk of dust arising in sufficient quantities to cause annoyance and/or health and/or ecological impacts should be determined using four risk categories: negligible, low, medium and high risk. A development is allocated to a risk category based on two factors:

- the scale and nature of the works, which determines the potential dust emission magnitude as small, medium or large (see Table 7); and
- the sensitivity of the area to dust impacts, which is defined as low, medium or high sensitivity (see Table 8 and 9).

These two factors are combined to determine the risk of dust impacts with no mitigation applied (see Table 10). The risk category assigned to the development can be different for each of the four potential activities (demolition, earthworks, construction and trackout).

Table 7 – Dust Emission Magnitude

Activity	Dust Emission Class		
	Large	Medium	Small
Demolition	Total building volume >50,000 m^3, potentially dusty construction material (e.g. concrete), on-site crushing and screening, demolition activities >20 m above ground level	Total building volume 20,000 – 50 000m^3, potentially dusty construction material, demolition activities 10-20 m above ground level	Total building volume <20,000 m^3, construction material with low potential for dust release (e.g. metal cladding or timber), demolition activities <10m above ground, demolition during wetter months
Earthworks	Total site area >10,000 m^2, potentially dusty soil type (e.g. clay, which will be prone to suspension when dry due to small particle size), >10 heavy earth moving vehicles active at any one time, formation of bunds >8 m in height, total material moved >100,000 tonnes	Total site area 2,500 – 10,000 m^2, moderately dusty soil type (e.g. silt), 5-10 heavy earth moving vehicles active at any one time, formation of bunds 4 m - 8 m in height, total material moved 20,000 tonnes – 100,000 tonnes	Total site area <2,500 m^2, soil type with large grain size (e.g. sand), <5 heavy earth moving vehicles active at any one time, formation of bunds <4 m in height, total material moved <10,000 tonnes, earthworks during wetter months
Construction	Total building volume >100,000 m^3, piling, on site concrete batching; sandblasting	Total building volume 25,000 m3 – 100,000 m^3, potentially dusty construction material (e.g. concrete), piling, on site concrete batching	Total building volume <25,000 m^3, construction material with low potential for dust release (e.g. metal cladding or timber)
Track out	>50 HDV (>3.5t) trips in any one day, potentially dusty surface material (e.g. high clay content), unpaved road length >100 m	10 – 50 HDV (>3.5t) trips in any one day, moderately dusty surface material (e.g. high clay content), unpaved road length 50m – 100 m;	<10 HDV (>3.5t) trips in any one day, surface material with low potential for dust release, unpaved road length <50 m.

Table 8 – Sensitivity of the Area to Dust Soiling Effects on People and Property

Sensitivity of the Area to Dust Soiling Effects					
Receptor Sensitivity	Number of Receptors	Distance from the Source (m)			
		<20	<50	<100	<350
High	>100	High	High	Medium	Low
	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 9 – Sensitivity of the Area to Human Health Impacts

Sensitivity of the Area to Human Health Effects							
Receptor Sensitivity	Annual Mean PM_{10} Concentration	Number of Receptors	Distance from the Source (m)				
			<20	<50	<100	<200	<350
High	>32 µg/m^3	>100	High	High	High	Medium	Low
		10-100	High	High	Medium	Low	Low
		1-10	High	Medium	Low	Low	Low
	28-32 µg/m^3	>100	High	High	Medium	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	High	Medium	Low	Low	Low
	24-28 µg/m^3	>100	High	Medium	Low	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	<24 µg/m^3	>100	Medium	Low	Low	Low	Low
		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Medium	-	>10	High	Medium	Low	Low	Low
	-	1-10	Medium	Low	Low	Low	Low
Low	-	>1	Low	Low	Low	Low	Low

Table 10 – Risk of Dust Impacts

Construction Activity	Sensitivity of Area	Dust Emission Magnitude		
		Large	Medium	Small
Demolition	High	High Risk	Medium Risk	Medium Risk
	Medium	High Risk	Medium Risk	Low Risk
	Low	Low Risk	Low Risk	Negligible
Earthworks	High	High Risk	Medium Risk	Low Risk
	Medium	Medium Risk	Medium Risk	Low Risk
	Low	Low Risk	Low Risk	Negligible
Construction	High	High Risk	Medium Risk	Low Risk
	Medium	Medium Risk	Medium Risk	Low Risk
	Low	Low Risk	Low Risk	Negligible
Track out	High	High Risk	Medium Risk	Low Risk
	Medium	Medium Risk	Low Risk	Negligible
	Low	Low Risk	Low Risk	Negligible

4.7.2 Operational Phase

The significance of emissions will be determined by comparing the predicted results to the Air Pollution Exposure Criteria (APEC) detailed in the *Air Quality and Planning Guidance* written by the London Air Pollution Planning and the Local Environment (APPLE) working group[16]. The Air Pollution Exposure Criteria is considered appropriate to describe the significance of the impacts predicted, together with an indication as to the level of mitigation required in order for the development to be approved. The APEC table is provided below.

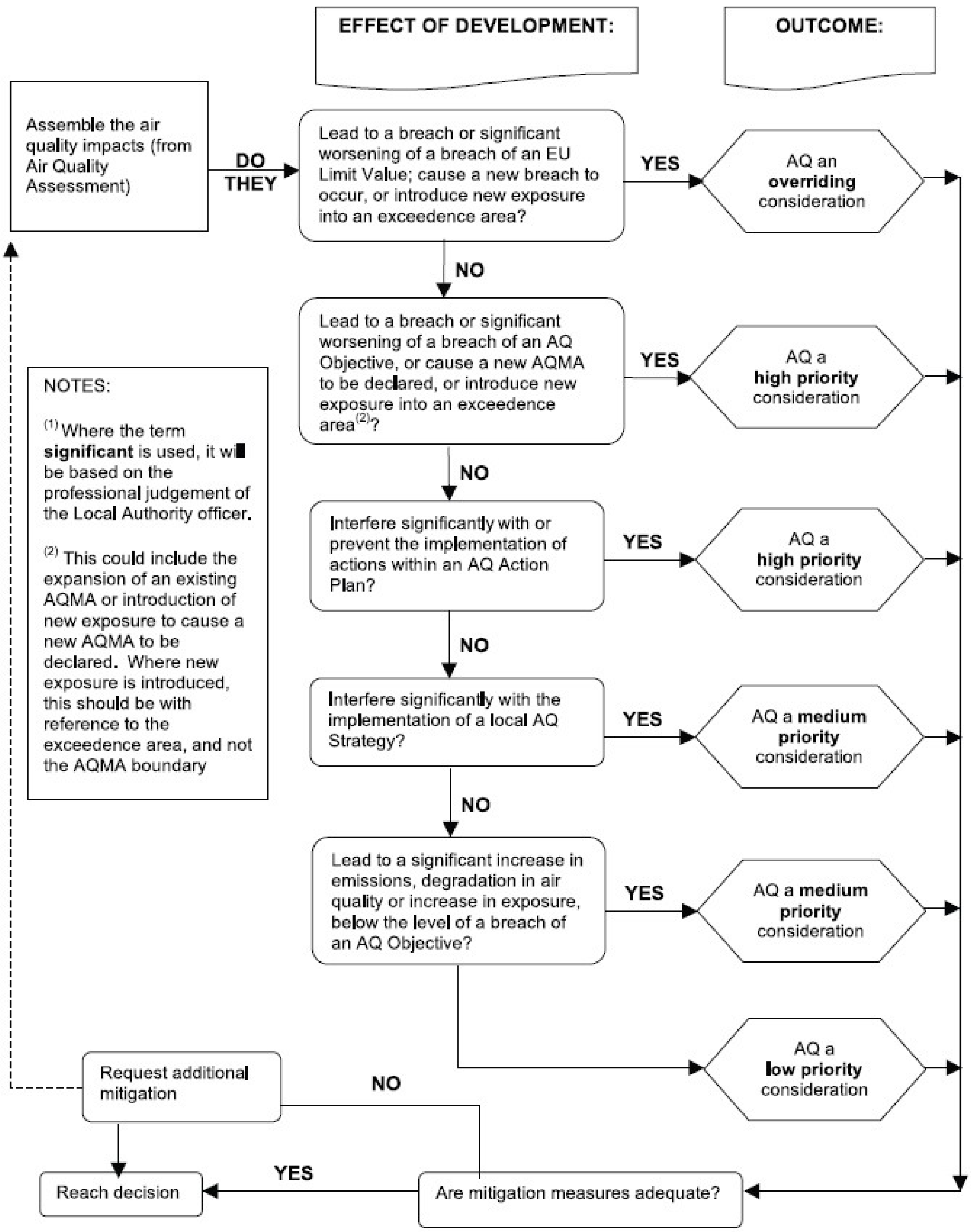
Table 11 – Air Pollution Exposure Criteria (APEC)

APEC Category	NO_2	PM_{10}	Recommendations
A	>5% below national annual mean objective	>5% below national annual mean objective >1-day less than national 24-hour objective	No air quality grounds for refusal; however mitigation of any emissions should be considered.
B	Between 5% below or above national annual mean objective	Between 5% above or below national annual mean objective Between 1-day above or below national 24-hour objective	May not be sufficient air quality grounds for refusal, however appropriate mitigation must be considered
C	>5% above national annual mean objective	>5% above national annual mean objective >1-day more than national 24-hour objective	Refusal on air quality grounds should be anticipated, unless the Local Authority has a specific policy enabling such land use and ensure best endeavours to reduce exposure are incorporated

Furthermore, the guidance released by Environmental Protection UK also provides steps for a Local Authority to follow to assess the significance of air quality impacts of a development proposal. This procedure, shown in Figure 5, has also been applied to the modelled results.

16 Air Quality and Planning Guidance, written by the London Air Pollution Planning and the Local Environment (APPLE) working group, January 2007

Figure 5 – Assessing the Significance of Air Quality Impacts of a Development Proposal



5 AIR QUALITY ASSESSMENT

5.1 Impact from Construction Activities

The assessment of construction activities has focused on demolition, earthworks, construction and track out activities at the site. Using the criteria provided in Table 7 the dust emission magnitude for each activity is as follows:

- Demolition = Small (Total building volume <20,000 m^3);
- Earthworks = Small (Total site area <2,500 m^2);
- Construction = Medium (Total building volume 25,000 m3 – 100,000 m^3); and
- Track out = Medium (10 – 50 HDV (>3.5t) trips in any one day).

The sensitivity of the surrounding area to dust soiling and human health (Table 12) is then defined based on the criteria in Tables 8 and 9, which includes the number of medium or highly sensitive receptors that fall within a certain distance of the proposed construction phase (see Figure 6). There are no designated ecological receptors within 50 metres of the proposed development.

Table 12 – Sensitivity of the Surrounding Area

Potential Impact	Comments	Sensitivity
Dust Soiling	There are between 10 and 100 high sensitivity receptors e.g. residential dwellings, within 20 metres of the proposed development.	High
Human Health	There are between 1 and 10 medium sensitivity receptors e.g. places of work, within 20 metres of the proposed development.	Medium

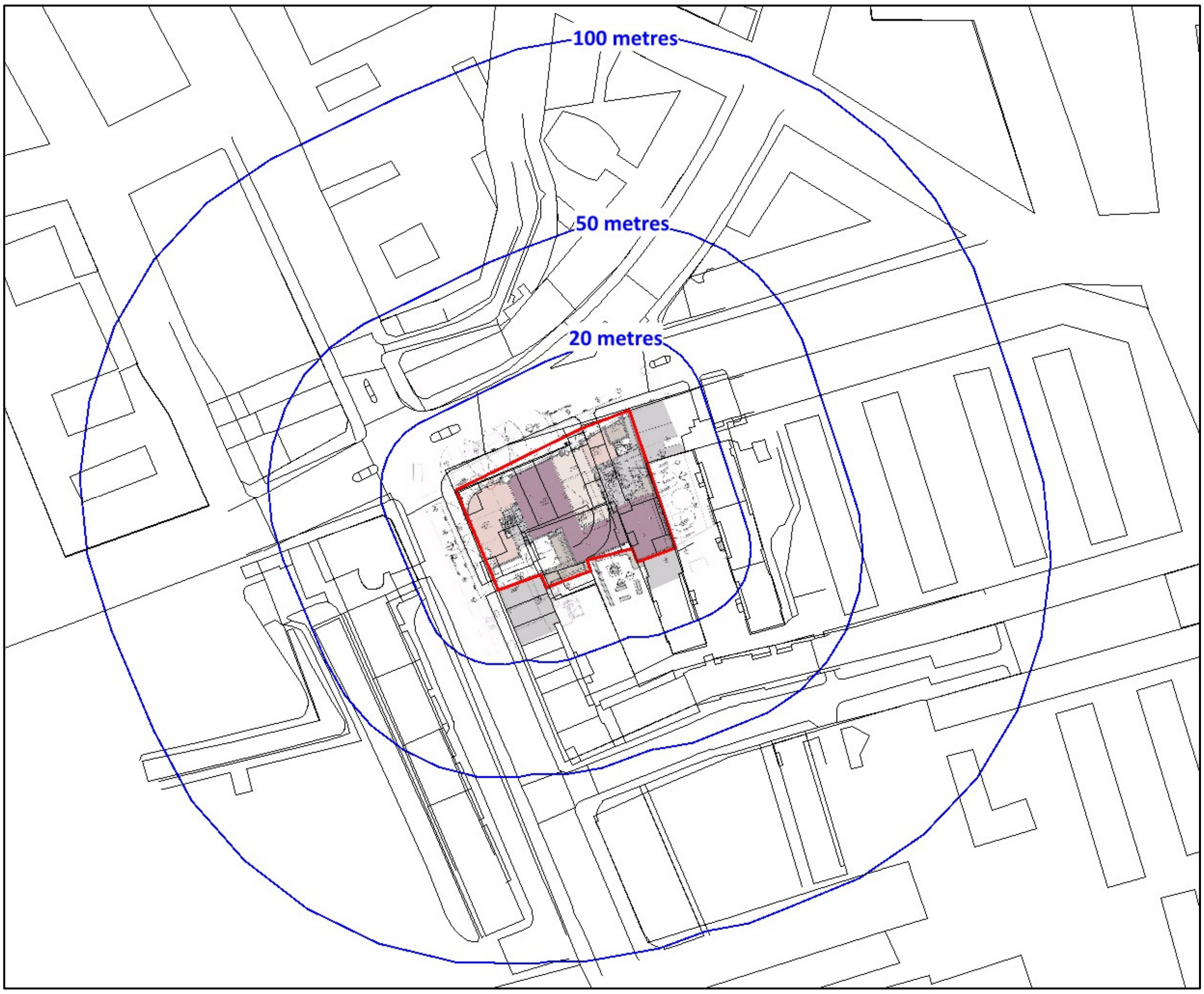
The dust emission magnitudes and sensitivity of the surrounding area are combined to determine the risk of dust impacts. These are summarised in Table 13.

Table 13 – Summary of Dust Risk

Potential Impact	Risk			
	Demolition	Earthworks	Construction	Track out
Dust Soiling	Medium Risk	Low Risk	Medium Risk	Low Risk
Human Health	Low Risk	Low Risk	Medium Risk	Low Risk

It should also be noted that the likelihood of an adverse impact occurring is correlated to wind speed and wind direction. As such, unfavourable wind speeds and wind directions must occur at the same time as a dust generating activity to generate an adverse impact. The overall impacts also assume that the dust generating activities are occurring over the entirety of the site meaning that as an activity moves further away from a potential receptor the magnitude and significance of the impact will be further reduced.

Figure 6 –Distance from the Proposed Development



5.2 Impact of Vehicle Emissions

5.2.1 Introduction

The following sections summarise the modelled concentrations associated with existing and future road traffic emissions, as defined by the modelled scenarios summarised in Section 4.2.1.

5.2.2 Model Verification

Using the guidance provided within the London Local Air Quality Management Technical Guidance TG(16), the modelled output has been verified against the monitoring data obtained from the sites listed in Table 5. The following tables provide a summary of the model verification process for NOx/NO_2 concentrations.

Table 14 – Comparison of Modelled and Monitored NO_2 Concentrations (µg/m^3), 2019

Verification Location	Modelled Concentration	Monitored Concentration	Difference [(modelled - monitored)/ monitored] x100
CA21	37.8	48.48	-22.0%

As described in the Technical Guidance (LAQM.TG16), to provide more confidence in the model predictions and the decisions based on these, the majority of results should be within ±25% (ideally ±10%) of the monitored concentrations. To improve the confidence in modelled NO_2 concentrations across the modelled domain the model output has been adjusted. This is described further in the next section.

5.2.3 Model Adjustment

To undertake model adjustment, it is first necessary to derive the monitored and modelled road contributions of NOx (excluding background). The modelled road contribution NOx is taken directly from the ADMS-Roads output before it has been converted to NO_2 using the NOx to NO_2 calculator described in Section 4.6.1. The NOx to NO_2 calculator can also be used to derive monitored road contributions of NOx from NO_2 diffusion tube results. A summary of these calculations is provided in Table 15.

Table 15 – Monitored NOx and NO_2 concentrations, 2019

Site ID	Monitored Total NO_2	Defra Background NO_2	Monitored road contribution NO_2 (total – background)	Monitored road contribution NOx (total – background)	Modelled road contribution NOx (excludes background)	Ratio of monitored road contribution NOx / modelled road contribution NOx
CA21	48.48	32.0	16.48	39.3	12.9	3.03

Once the monitored and modelled road contributions of NOx (excluding background) have been derived the contributions of NOx are compared and a ratio derived. In this case the ratio is 3.03 and this factor has been used to adjust the modelled road contribution of NOx. This is shown in Table 16.

Table 16 – Adjustment of Modelled NOx Contributions, 2019

Site ID	Adjustment factor for modelled road contribution	Adjusted modelled road contribution NOx	Modelled total NO_2 (based on empirical NOx/NO_2 relationship)	Monitored total NO_2	% Difference [(modelled – monitored) / monitored] x 100
CA21	3.03	39.2	48.5	48.48	0.0%

Following adjustment of the modelled NOx concentrations by a factor of 3.03 the total NO_2 concentration at the model verification location has been calculated using the method described in Section 4.6.1. The revised NO_2 concentration, shown in Table 10, indicates a more acceptable model performance when compared against the monitored NO_2 concentrations. As such, an adjustment factor of 3.03 has been applied to all modelled NOx concentrations across the model domain before conversion to NO_2.

5.2.4 Nitrogen Dioxide

Predicted annual mean concentrations for NO_2 in 2019 and 2027 are provided in Table 17. As mentioned in Section 4.6.1, NO_2 concentrations have been calculated from the predicted NOx concentrations using the latest NOx-NO_2 conversion spreadsheet available from the Air Quality Archive.

Table 17 – Predicted NO_2 Concentrations, Annual Mean (µg/m^3)

Receptor ID	2019				2027			
	Ground Floor	1st	2nd	3rd	Ground Floor	1st	2nd	3rd
Proposed Residential								
1	36.4	35.9	35.1	34.3	34.5	34.2	33.7	33.3
2	37.2	36.4	35.3	34.3	34.9	34.4	33.8	33.3
3	36.6	35.8	34.8	33.9	34.5	34.1	33.5	33.1
4	35.6	35.2	34.6	33.9	34.0	33.8	33.4	33.1
Objective	**40.0**							
Proposed Commercial (Ground Floor)								
5	41.8				37.4			
6	43.2				38.2			
7	42.1				37.6			
8	40.5				36.9			
9	40.9				37.3			
10	41.7				37.9			
Objective	**<60.0**							

The ADMS predictions for annual mean NO_2 concentrations in 2019 and 2027 indicate that the annual mean objective (40 µg/m^3) would be achieved at all modelled residential receptors.

Nitrogen dioxide also has an hourly objective of 200 µg/m^3 not to be exceeded more than 18 times in one year. However, the hourly mean concentration has not been calculated directly by ADMS Roads. This is as a result of an evaluation of continuous monitoring data from across the UK that revealed that the relationship between the annual mean and hourly mean NO_2 concentrations was very weak. Nonetheless, research undertaken in 2003[17] has indicated that the hourly NO_2 objective is unlikely to be exceeded at a roadside location where the annual mean NO_2 concentration is less than 60 µg/m^3. Given that predicted NO_2

[17] Analysis of Relationship between 1-Hour and Annual Mean Nitrogen Dioxide at UK Roadside and Kerbside Monitoring Sites, Laxen and Marner, 2003

concentrations in 2019 and 2027 are below 60 µg/m^3 at all modelled receptors the likelihood of the short-term objective for NO_2 being exceeded is considered low.

5.2.5 Particulate Matter

Predicted annual mean concentrations for PM_{10} in 2019 and 2027 are provided in Table 18.

Table 18 – Predicted PM_{10} Concentrations, Annual Mean (µg/m^3)

Receptor ID	2019				2027			
	Ground Floor	1st	2nd	3rd	Ground Floor	1st	2nd	3rd
Proposed Residential								
1	18.3	18.2	18.2	18.1	18.2	18.2	18.2	18.1
2	18.3	18.3	18.2	18.1	18.3	18.2	18.2	18.1
3	18.3	18.2	18.2	18.1	18.3	18.2	18.2	18.1
4	18.2	18.2	18.2	18.1	18.2	18.2	18.1	18.1
Objective	**40.0**							
Proposed Commercial (Ground Floor)								
5	18.6				18.6			
6	18.7				18.7			
7	18.6				18.6			
8	18.5				18.5			
9	18.5				18.5			
10	18.5				18.5			
Objective	**40.0**							

The ADMS predictions for annual mean PM_{10} concentrations in 2019 and 2027 indicate that the annual mean objective (40 µg/m^3) would be achieved at all the modelled receptor locations. In addition, the maximum number of days when PM_{10} concentrations are more than 50 µg/m^3 is 2, less than the 35 exceedences allowed in the regulations.

Predicted annual mean concentrations for $PM_{2.5}$ in 2019 and 2027 are provided in Table 19. The ADMS predictions for annual mean $PM_{2.5}$ concentrations in 2019 and 2027 indicate that the annual mean objective (25 µg/m^3) would be achieved at all the modelled receptor locations.

Table 19 – Predicted $PM_{2.5}$ Concentrations, Annual Mean (µg/m³)

Receptor ID	2019				2027			
	Ground Floor	1st	2nd	3rd	Ground Floor	1st	2nd	3rd
Proposed Residential								
1	11.2	11.1	11.1	11.1	11.1	11.1	11.1	11.1
2	11.2	11.2	11.1	11.1	11.2	11.1	11.1	11.1
3	11.2	11.1	11.1	11.1	11.1	11.1	11.1	11.1
4	11.1	11.1	11.1	11.1	11.1	11.1	11.1	11.1
Objective	**25.0**							
Proposed Commercial (Ground Floor)								
5	11.4				11.3			
6	11.4				11.4			
7	11.4				11.3			
8	11.3				11.3			
9	11.3				11.3			
10	11.3				11.3			
Objective	**25.0**							

6 AIR QUALITY NEUTRAL ASSESSMENT

6.1 Introduction

The air quality neutral assessment has followed the methodology outlined in the draft Air Quality Neutral guidance[18]. Within these documents, benchmarks have been provided in relation to building and transport emissions, together with a methodology for calculating the building and transport related emissions for a particular development.

6.2 Transport Emissions

The benchmark trip rates for the proposed land uses are provided in Table 20. The total Transport Emission Benchmark (TEB) is provided in Table 21. The transport consultant has advised that the proposed development will generate 102 daily vehicle movements (37,230 trips per annum). This is lower than the Transport Emission Benchmark for the development, as shown in Table 21. As such, the development is considered air quality neutral in relation to the proposed transport emissions.

Table 20 – Benchmark Trip Rates

Land Use	Benchmark Trip Rate (Inner London)
Restaurant / Café	137 trips/m^2/year
Office / Light Industrial	1 trips/m^2/year
Residential	114 trips/dwelling/year

Table 21 – Transport Emission Benchmark (TEB)

Land Use	Floor Area / No of Dwellings	Benchmark Trip Rate (Inner London)	Total Benchmark Trip Rate (per annum)
Restaurant / Café	411	137 trips/m^2/year	56,307
Office / Light Industrial	13,377	1 trips/m^2/year	13,377
Residential	6	114 trips/dwelling/year	684
Transport Emission Benchmark for Development			**70,368**

18 London Plan Guidance: Air Quality Neutral. GLA, November 2021

6.3 Building Emissions

All heating and hot water will be provided using Air Source Heat Pumps (ASHP). As such, the air quality neutral assessment for building emissions has not been undertaken as no gas will be utilised on site.

7 Conclusions And Recommendations

7.1 Impact from Construction Activities

A qualitative assessment of dust levels associated with the proposed development has been carried out. The impact of dust soiling and PM_{10} can be reduced to negligible through appropriate mitigation measures, which are listed in Table 22 and are applicable to a medium risk site. Implementation of these Best Practice Measures will help reduce the impact of the construction activities.

With these mitigation measures enforced, the likelihood of nuisance dust episodes occurring at those receptors adjacent to the development are considered low. Notwithstanding this, the developer should take into account the potential impact of air quality and dust on occupational exposure standards (in order to minimise worker exposure) and breaches of air quality objectives that may occur outside the site boundary. Monitoring is not recommended at this stage, however, continuous visual assessment of the site should be undertaken and a complaints log maintained in order determine the origin of a particular dust nuisance. Keeping an accurate and up to date complaints log will isolate particular site activities to a nuisance dust episode and help prevent it from reoccurring in the future.

Table 22 – Mitigation of Construction Activities

Construction Activity	Mitigation Measures
Site Management	Develop and implement a stakeholder communications plan that includes community engagement before work commences on site
	Develop a Dust Management Plan.
	Display the name and contact details of person(s) accountable for air quality pollutant emissions and dust issues on the site boundary.
	Display the head or regional office contact information.
	Record and respond to all dust and air quality pollutant emissions complaints.
	Make a complaints log available to the local authority when asked.
	Carry out regular site inspections to monitor compliance with air quality and dust control procedures, record inspection results, and make an inspection log available to the local authority when asked.
	Increase the frequency of site inspections by those accountable for dust and air quality pollutant emissions issues when activities with a high potential to produce dust and emissions and dust are being carried out, and during prolonged dry or windy conditions.
	Record any exceptional incidents that cause dust and air quality pollutant emissions, either on or off the site, and the action taken to resolve the situation is recorded in the log book.
Preparing and Maintaining the Site	Plan site layout: machinery and dust causing activities should be located away from receptors.
	Erect solid screens or barriers around dust activities or the site boundary that are, at least, as high as any stockpiles on site.
	Fully enclosure site or specific operations where there is a high potential for dust production and the site is active for an extensive period.
	Avoid site runoff of water or mud.
	Keep site fencing, barriers and scaffolding clean using wet methods.
	Remove materials from site as soon as possible.
	Cover, seed or fence stockpiles to prevent wind whipping.
Operating Vehicle/Machinery and Sustainable Travel	Ensure all on-road vehicles comply with the requirements of the London LEZ and ULEZ
	Ensure all non-road mobile machinery (NRMM) comply with the relevant standards
	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 possible.
	Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.
	Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).
Operations	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.
	Ensure an adequate water supply on the site for effective dust/particulate matter mitigation (using recycled water where possible).
	Use enclosed chutes, 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.
	Ensure equipment is readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.
Waste Management	Reuse and recycle waste to reduce dust from waste materials
	Avoid bonfires and burning of waste materials.

7.2 Impact of Vehicle Emissions

The predicted concentrations of NO_2, PM_{10} and $PM_{2.5}$ in all modelled years are below the relevant objectives applicable to the type of use. Predicted concentrations at all the modelled receptors fall within APEC Category A, which states that there are "no air quality grounds for refusal, however, mitigation of any emissions should be considered". Overall, using the flow chart presented in Figure 5, air quality is a low priority consideration at the modelled locations in each of the modelled years.

7.3 Air Quality Neutral Assessment

The proposed development is considered air quality neutral in relation to the transport and building emissions. As such, no mitigation is considered necessary.

7.4 Air Quality Mitigation

7.4.1 Building Mitigation

Based on the results and discussion above there is no need to consider building mitigation.

7.5 Overall Conclusion

Based on the outcome of this assessment the current proposals are considered acceptable in terms of the potential air quality impacts across the development.