Air Quality Assessment:
Warren Court, Camden

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Experts in air quality
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Client	Warren Court Investments LLP	**Principal Contact**	Archie Avery

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Report Prepared By:	George Chousos

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Air Quality Consultants Ltd
23 Coldharbour Road, Bristol BS6 7JT Tel: 0117 974 1086
24 Greville Street, Farringdon, London, EC1N 8SS Tel: 020 3873 4780
aqc@aqconsultants.co.uk

Registered Office: 23 Coldharbour Road, Bristol BS6 7JT
Companies House Registration No: 2814570

Contents

1 Introduction 2
2 Policy Context and Assessment Criteria 3
3 Assessment Criteria 12
4 Assessment Approach 15
5 Site Description and Baseline Conditions 16
6 Impact Assessment 24
7 'Air Quality Neutral' 26
8 Mitigation 27
9 Conclusions 28
10 References 29
11 Glossary 32
12 Appendices 34
A1 London-Specific Policies and Measures 35
A2 EPUK & IAQM Planning for Air Quality Guidance 38
A3 Professional Experience 44
A4 Construction Mitigation 45

1 Introduction

1.1 This report describes the potential air quality impacts associated with the proposed replacement and enlargement of the existing 6th floor apartment, within Warren Court, 293 Euston Road, NW1 in order to create four flats. The assessment has been carried out by Air Quality Consultants Ltd on behalf of Warren Court Investments LLP.

1.2 The proposed development lies within a borough-wide Air Quality Management Area (AQMA) declared by Camden Council for exceedances of the annual mean nitrogen dioxide (NO_2) and 24-hour mean particulate matter (PM_{10}) objectives. The new residential properties will be subject to the impacts of road traffic emissions from the adjacent road network. The main air pollutants of concern related to road traffic emissions are nitrogen dioxide (NO_2) and fine particulate matter (PM_{10} and $PM_{2.5}$). The assessment also considers best practice measures to minimise dust emissions during the construction phase.

1.3 No car parking or centralised energy plant are proposed as part of the development and thus impacts of the development upon local air quality during operation are not considered further.

1.4 This report describes existing local air quality conditions (base year 2019; 2020 was not used due to the impacts of the Covid-19 pandemic), qualitatively considers the air quality conditions that future residents are likely to experience in the anticipated year of first occupation (2023) and has been prepared considering all relevant local and national guidance and regulations.

2 Policy Context and Assessment Criteria

2.1 All European legislation referred to in this report is written into UK law and remains in place.

Air Quality Strategy

2.2 The Air Quality Strategy (Defra, 2007) published by the Department for Environment, Food, and Rural Affairs (Defra) and Devolved Administrations, provides the policy framework for air quality management and assessment in the UK. It provides air quality standards and objectives for key air pollutants, which are designed to protect human health and the environment. It also sets out how the different sectors: industry, transport and local government, can contribute to achieving the air quality objectives. Local authorities are seen to play a particularly important role. The strategy describes the Local Air Quality Management (LAQM) regime that has been established, whereby every authority has to carry out regular reviews and assessments of air quality in its area to identify whether the objectives have been, or will be, achieved at relevant locations, by the applicable date. If this is not the case, the authority must declare an Air Quality Management Area (AQMA) and prepare an action plan which identifies appropriate measures that will be introduced in pursuit of the objectives.

Clean Air Strategy 2019

2.3 The Clean Air Strategy (Defra, 2019) sets out a wide range of actions by which the UK Government will seek to reduce pollutant emissions and improve air quality. Actions are targeted at four main sources of emissions: Transport, Domestic, Farming and Industry. At this stage, there is no straightforward way to take account of the expected future benefits to air quality within this assessment.

Environment Act 2021

2.4 The UK's new legal framework for protection of the natural environment, the Environment Act (2021) passed into UK law in November 2021. The Act gives the Government the power to set long-term, legally binding environmental targets. It also establishes an Office for Environmental Protection (OEP), responsible for holding the government to account and ensuring compliance with these targets.

2.5 The Act requires the Government to set at least one long-term target (spanning a minimum of 15 years), supported by interim targets set in a five-year cycle, in each of four identified areas: Air Quality, Biodiversity, Water and Resource Efficiency and Waste Reduction. An additional target for mean levels of $PM_{2.5}$ is also required. These were expected to have been set by November 2022 but are currently delayed with no fixed publication date. As the targets have not yet been either finalised or adopted by the Government, they cannot impact on current planning policy.

Planning Policy

National Policies

2.6 The National Planning Policy Framework (NPPF) (2021) sets out planning policy for England. It states that the purpose of the planning system is to contribute to the achievement of sustainable development, and that the planning system has three overarching objectives, one of which (Paragraph 8c) is an environmental objective:

"to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy".

2.7 To prevent unacceptable risks from air pollution, Paragraph 174 of the NPPF states that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by…preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air quality".

2.8 Paragraph 185 states:

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development".

2.9 More specifically on air quality, Paragraph 186 makes clear 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".

2.10 The NPPF is supported by Planning Practice Guidance (PPG) (Ministry of Housing, Communities & Local Government, 2019), which includes guiding principles on how planning can take account of the impacts of new development on air quality. The PPG states that:

"Defra carries out an annual national assessment of air quality using modelling and monitoring to determine compliance with Limit Values. 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, or where the need for emissions reductions has been identified".

2.11 Regarding plan-making, the PPG states:

"It is important to take into account air quality management areas, Clean Air Zones and other areas including sensitive habitats or designated sites of importance for biodiversity where there could be specific requirements or limitations on new development because of air quality".

2.12 The role of the local authorities through the LAQM regime is covered, with the PPG stating that a local authority Air Quality Action Plan "*identifies measures that will be introduced in pursuit of the objectives and can have implications for planning*". In addition, the PPG makes clear that *"… dust can also be a planning concern, for example, because of the effect on local amenity"*.

2.13 Regarding the need for an air quality assessment, the PPG 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".

2.14 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".

2.15 The PPG 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. It is important that local planning authorities work with applicants to consider appropriate mitigation so as to ensure new development is appropriate for its location and unacceptable risks are prevented".

London-Specific Policies

2.16 The key London-specific policies are summarised below, with more detail provided, where required, in Appendix A1.

The London Plan

2.17 The London Plan (GLA, 2021a) sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The key policy relating to air quality is Policy SI 1 on *Improving air quality*, Part B1 of which sets out three key requirements for developments:

"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".

2.18 The Policy then details how developments should meet these requirements, stating:

"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".

2.19 Part C of the Policy introduces the concept of Air Quality Positive for large-scale development, stating:

"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:

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

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

2.20 The proposed development is not large-scale development, thus an Air Quality Positive statement is not required.

2.21 Regarding construction and demolition impacts, Part D of Policy SI 1 of the London Plan states:

"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".

2.22 Part E of Policy SI 1 states the following regarding mitigation and offsetting of emissions:

"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".

2.23 The explanatory text around Policy SI 1 of the London Plan states the following with regard to assessment criteria:

"The Mayor is committed to making air quality in London the best of any major world city, which means not only achieving compliance with legal limits for Nitrogen Dioxide as soon as possible and maintaining compliance where it is already achieved, but also achieving World Health Organisation targets for other pollutants such as Particulate Matter.

The aim of this policy is to ensure that new developments are designed and built, as far as is possible, to improve local air quality and reduce the extent to which the public are exposed to poor air quality. This means that new developments, as a minimum, must not cause new exceedances of legal air quality standards, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits. Where limit values are already met, or are predicted to be met at the time of completion, new developments must endeavour to maintain the best ambient air quality compatible with sustainable development principles.

Where this policy refers to 'existing poor air quality' this should be taken to include areas where legal limits for any pollutant, or World Health Organisation targets for Particulate Matter, are already exceeded and areas where current pollution levels are within 5 per cent of these limits"[1].

2.24 The London Plan includes a number of other relevant policies, which are detailed in Appendix A1.

London Environment Strategy

2.25 The London Environment Strategy was published in May 2018 (GLA, 2018a). The strategy considers air quality in Chapter 4; the Mayor's main objective is to create a *"zero emission London by 2050".* Policy 4.2.1 aims to *"reduce emissions from London's road transport network by phasing out fossil fuelled vehicles, prioritising action on diesel, and enabling Londoners to switch to more sustainable forms of transport".* The strategy sets a target to achieve, by 2030, the guideline value for $PM_{2.5}$ which was set by the World Health Organisation (WHO) in 2005. An implementation plan for the strategy has also been published which sets out what the Mayor will do between 2018 and 2023 to help achieve the ambitions in the strategy.

Mayor's Transport Strategy

2.26 The Mayor's Transport Strategy (GLA, 2018b) sets out the Mayor's policies and proposals to reshape transport in London over the next two decades. The Strategy focuses on reducing car dependency and increasing active sustainable travel, with the aim of improving air quality and creating healthier streets. It notes that development proposals should *"be designed so that walking and cycling are the most appealing choices for getting around locally".*

GLA SPG: Sustainable Design and Construction

2.27 The GLA's SPG on Sustainable Design and Construction (GLA, 2014a) was revoked upon publication of the new London Plan, but it is understood that GLA still expects the emission standards set within it for gas-fired boilers, Combined Heat and Power (CHP) and biomass plant to be met.

GLA SPG: The Control of Dust and Emissions During Construction and Demolition

2.28 The GLA's SPG on The Control of Dust and Emissions During Construction and Demolition (GLA, 2014b) outlines a risk assessment based approach to considering the potential for dust generation from a construction site, and sets out what mitigation measures should be implemented to minimise the risk of construction dust impacts, dependent on the outcomes of the risk assessment. This guidance is largely based on the Institute of Air Quality Management's (IAQM's)[2] guidance (IAQM, 2016), and it states that "*the latest version of the IAQM Guidance should be used*".

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1 The London Plan was developed based on a World Health Organisation guideline for $PM_{2.5}$ of 10 $\mu g/m^3$ (see Paragraph 2.25).

2 The IAQM is the professional body for air quality practitioners in the UK.

Air Quality Focus Areas

2.29 The GLA has identified 183 air quality Focus Areas in London. These are locations that not only exceed the annual mean limit value for nitrogen dioxide, but also have high levels of human exposure. They do not represent an exhaustive list of London's air quality hotspot locations, but locations where the GLA believes the problem to be most acute. They are also areas where the GLA considers there to be the most potential for air quality improvements and are, therefore, where the GLA and Transport for London (TfL) will focus actions to improve air quality. The proposed development is located within the *'Marylebone Road from Marble Arch/Euston/King's Cross Juction'* air quality Focus Area.

Local Policies

2.30 The Camden Council Local Plan (Camden Council, 2017) was adopted in 2017. The Plan sets out the Council's planning policies, covering the period from 2016-2031, and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). It contains one relevant policy; Policy CC4 'Air Quality', which states that:

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

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

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

2.31 Camden has a 'Camden Planning Document' specifically pertaining to air quality, which forms a Supplementary Planning Document (SPD) (Camden Council, 2019a). This provides information on air quality in the borough and supports Local Plan Policy CC4 Air quality.

Air Quality Action Plans

National Air Quality Plan

2.32 Defra has produced an Air Quality Plan to tackle roadside nitrogen dioxide concentrations in the UK (Defra, 2017); a supplement to the 2017 Plan (Defra, 2018a) was published in October 2018 and sets out the steps Government is taking in relation to a further 33 local authorities where shorter-

term exceedances of the limit value were identified. Alongside a package of national measures, the 2017 Plan and the 2018 Supplement require those identified English Local Authorities (or the GLA in the case of London Authorities) to produce local action plans and/or feasibility studies. These plans and feasibility studies must have regard to measures to achieve the statutory limit values within the shortest possible time, which may include the implementation of a CAZ. There is currently no straightforward way to take account of the effects of the 2017 Plan or 2018 Supplement in this assessment; however, consideration has been given to whether there is currently, or is likely to be in the future, a limit value exceedance in the vicinity of the proposed development. This assessment has principally been carried out in relation to the air quality objectives, rather than the EU limit values that are the focus of the Air Quality Plan.

Building Standards

2.33 Part F(1) of the Building Regulations 2010 (Ministry of Housing, Communities & Local Government, 2020) places a duty on building owners, or those responsible for relevant building work[3], to ensure adequate ventilation is provided to building occupants. Compliance with the Building Regulations is not required for planning approval, but it is assumed that the Regulations will be complied with in the completed building.

2.34 Approved Document F, which accompanies the Building Regulations, explains that care should be taken to minimise entry of external air pollutants. Specific steps should be taken to manage ventilation intakes where the building is near to a significant source of emissions, or if local ambient concentrations exceed values set in the Air Quality Standards Regulations 2010 (see Paragraph 3.4, later). These steps include maximising the distance between emission source and air intake, considering likely dispersion patterns, and considering the timing of pollution releases when designing the ventilation system.

Air Quality Action Plans

National Air Quality Plan

2.35 Defra has produced an Air Quality Plan to tackle roadside nitrogen dioxide concentrations in the UK (Defra, 2017); a supplement to the 2017 Plan (Defra, 2018a) was published in October 2018 and sets out the steps Government is taking in relation to a further 33 local authorities where shorter-term exceedances of the limit value were identified. Alongside a package of national measures, the 2017 Plan and the 2018 Supplement require those identified English Local Authorities (or the GLA in the case of London Authorities) to produce local action plans and/or feasibility studies. These plans and feasibility studies must have regard to measures to achieve the statutory limit values within the shortest possible time, which may include the implementation of a CAZ. There is currently no

[3] Building work is a legal term for work covered by the Building Regulations. With limited exemptions, the Regulations apply to all significant building work, including erecting or extending a building.

straightforward way to take account of the effects of the 2017 Plan or 2018 Supplement in this assessment; however, consideration has been given to whether there is currently, or is likely to be in the future, a limit value exceedance in the vicinity of the proposed development. This assessment has principally been carried out in relation to the air quality objectives, rather than the limit values that are the focus of the Air Quality Plan.

Local Air Quality Action Plan

2.36 Camden Council declared an AQMA, in 2002, as a result of exceedances of the annual mean nitrogen dioxide and 24-hour mean PM_{10} objectives that covers the whole borough. The Council has since developed an Air Quality Action Plan (Camden Council, 2019b). The Plan focuses on key priorities and actions in order to; reduce construction, building and transport emissions; support communities and schools; continue public health and awareness raising; and lobbying.

3 Assessment Criteria

3.1 The Government has established a set of air quality standards and objectives to protect human health. The 'standards' are set as concentrations below which effects are unlikely even in sensitive population groups, or below which risks to public health would be exceedingly small. They are based purely upon the scientific and medical evidence of the effects of an individual pollutant. The 'objectives' set out the extent to which the Government expects the standards to be achieved by a certain date. They take account of economic efficiency, practicability, technical feasibility and timescale. The objectives for use by local authorities are prescribed within the Air Quality (England) Regulations (2000) and the Air Quality (England) (Amendment) Regulations (2002).

3.2 The UK-wide objectives for nitrogen dioxide and PM_{10} were to have been achieved by 2005 and 2004 respectively and continue to apply in all future years thereafter. The $PM_{2.5}$ objective was to be achieved by 2020. Measurements across the UK have shown that the 1-hour nitrogen dioxide objective is unlikely to be exceeded at roadside locations where the annual mean concentration is below 60 µg/m^3 (Defra, 2022e). Measurements have also shown that the 24-hour mean PM_{10} objective could be exceeded at roadside locations where the annual mean concentration is above 32 µg/m^3 (Defra, 2022e).

3.3 The objectives apply at locations where members of the public are likely to be regularly present and are likely to be exposed over the averaging period of the objective. The GLA explains where these objectives will apply in London (GLA, 2019). The annual mean objectives for nitrogen dioxide and PM_{10} are considered to apply at the façades of residential properties, schools, hospitals and care homes etc., the gardens of residential properties, school playgrounds and the grounds of hospitals and care homes. The 24-hour mean objective for PM_{10} is considered to apply at the same locations as the annual mean objective, as well as at hotels. The 1-hour mean objective for nitrogen dioxide applies wherever members of the public might regularly spend 1-hour or more, including outdoor eating locations and pavements of busy shopping streets.

3.4 EU Directive 2008/50/EC (The European Parliament and the Council of the European Union, 2008) sets limit values for nitrogen dioxide, PM_{10} and $PM_{2.5}$, and is implemented in UK law through the Air Quality Standards Regulations (2010)[4]. The limit values for nitrogen dioxide and PM_{10} are the same numerical concentrations as the UK objectives, whilst the limit value for $PM_{2.5}$ is 20 µg/m^3. Achievement of the limit values is a national obligation rather than a local one. In the UK, only monitoring and modelling carried out by UK Central Government meets the specification required to assess compliance with the limit values. Central Government does not normally recognise local authority monitoring or local modelling studies when determining the likelihood of the

[4] As amended through The Air Quality Standards (Amendment) Regulations 2016 and The Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020.

limit values being exceeded, unless such studies have been audited and approved by Defra and DfT's Joint Air Quality Unit (JAQU).

3.5 The relevant air quality criteria for this assessment are provided in Table 1.

Table 1: Air Quality Criteria for Nitrogen Dioxide, PM_{10} and $PM_{2.5}$

Pollutant	Time Period	Objective
Nitrogen Dioxide	1-hour Mean	200 µg/m^3 not to be exceeded more than 18 times a year
	Annual Mean	40 µg/m^3
Fine Particles (PM_{10})	24-hour Mean	50 µg/m^3 not to be exceeded more than 35 times a year
	Annual Mean	40 µg/m^3 [a]
Fine Particles ($PM_{2.5}$) [b]	Annual Mean	25 µg/m^3

[a] A proxy value of 32 µg/m^3 as an annual mean is used in this assessment to assess the likelihood of the 24-hour mean PM_{10} objective being exceeded. Measurements have shown that, above this concentration, exceedances of the 24-hour mean PM_{10} objective are possible (Defra, 2018b).

[b] The $PM_{2.5}$ objective, which is to be met by 2020, is not in Regulations and there is no requirement for local authorities to meet it.

3.6 In March 2022, Defra began consultation on new targets for $PM_{2.5}$ concentrations in England. One proposed target is to achieve $PM_{2.5}$ concentration of 10 µg/m^3 at relevant national monitoring sites by 2040. This would be accompanied by a target to reduce overall population exposure to $PM_{2.5}$, which will be assessed by national government using its own measurements. If adopted, these targets will apply to national government; it is not yet clear how these will apply to local government and, as such, are not considered further in this assessment.

GLA $PM_{2.5}$ Target

3.7 As explained in Paragraph 2.25, the GLA has set a target to achieve an annual mean $PM_{2.5}$ concentration of 10 µg/m^3 by 2030. This target was derived from an air quality guideline set by WHO in 2005. In 2021, WHO updated its guidelines, but the London Environment Strategy (GLA, 2018a) considers the 2005 guideline of 10 µg/m^3. While there is no explicit requirement to assess against the GLA target of 10 µg/m^3, it has nevertheless been included within this assessment.

Construction Dust Criteria

3.8 There are no formal assessment criteria for dust. In the absence of formal criteria, the approach developed by the Institute of Air Quality Management (IAQM) (2016) has been used (the GLA's SPG (GLA, 2014b) recommends that the assessment be based on the latest version of the IAQM guidance).

Screening Criteria for Road Traffic Assessments

3.9 Environmental Protection UK (EPUK) and IAQM recommend a two-stage screening approach (Moorcroft and Barrowcliffe et al, 2017) to determine whether emissions from road traffic generated by a development have the potential for significant air quality impacts. The approach, as described in Appendix A2, first considers the size and parking provision of a development; if the development is residential and is for fewer than ten homes or covers less than 0.5 ha, or is non-residential and will provide less than 1,000 m^2 of floor space or cover a site area of less than 1 ha, and will provide ten or fewer parking spaces, then there is no need to progress to a detailed assessment.

3.10 The second stage then compares the changes in vehicle flows on local roads that a development will lead to against specified screening criteria. The screening thresholds (described in full in Appendix A2) inside an AQMA are a change in flows of more than 25 heavy duty vehicles or 100 light duty vehicles per day; outside of an AQMA the thresholds are 100 heavy duty vehicles or 500 light duty vehicles. Where these criteria are exceeded, a detailed assessment is likely to be required, although the guidance advises that *"the criteria provided are precautionary and should be treated as indicative"*, and *"it may be appropriate to amend them on the basis of professional judgement"*.

4 Assessment Approach

Existing Conditions

4.1 Existing sources of emissions and baseline air quality conditions within the study area have been defined using a number of approaches:

- industrial and waste management sources that may affect the area have been identified using Defra's Pollutant Release and Transfer Register (Defra, 2022a);
- local sources have been identified through examination of the Council's Air Quality Review and Assessment reports;
- information on existing air quality has been obtained by collating the results of monitoring carried out by the local authority;
- background concentrations have been defined using Defra's 2018-based background maps (Defra, 2022d). These cover the whole of the UK on a 1x1 km grid; and
- whether or not there are any exceedances of the annual mean limit value for nitrogen dioxide in the study area has been identified using the maps of roadside concentrations published by Defra (2020) (2022b). These are the maps used by the UK Government, together with the results from national Automatic Urban and Rural Network (AURN) monitoring sites that operate to the required data quality standards, to identify and report exceedances of the limit value. The national maps of roadside PM_{10} and $PM_{2.5}$ concentrations (Defra, 2022b), which are available for the years 2009 to 2019, show no exceedances of the limit values anywhere in the UK in 2019.

Construction Dust

4.2 Construction dust impacts have been considered qualitatively, taking into consideration the scale of the works and proximity to sensitive receptors. Appropriate mitigation has been recommended based on the GLA (GLA, 2014b) and IAQM (IAQM, 2016) recommendations.

Impacts on Development

4.3 The potential impacts upon occupants of the proposed development have been considered qualitatively, based on the existing and future baseline conditions. The assessment takes into account both the horizontal and vertical distance between the road and proposed receptors.

5 Site Description and Baseline Conditions

Proposed Development

5.1 The development site is located at 293 Euston Road, as shown in Figure 1. The proposed development is located above Warren Court tube station, adjacent to Euston Road, Tottenham Court Road and Warren Street.

Figure 1: Site Location

Reproduced from drawing 1281-EX-000 prepared by HUB Architects, September 2019.

Industrial sources

5.2 No significant industrial or waste management sources have been identified that are likely to affect the proposed development, in terms of air quality.

Air Quality Management Areas

5.3 Camden Council has investigated air quality within its area as part of its responsibilities under the LAQM regime. In September 2002 an AQMA was declared, encompassing the whole borough, for exceedances of the annual mean nitrogen dioxide and the 24-hour mean particulate matter (PM_{10}) objectives. The proposed development is located within the AQMA.

Air Quality Focus Areas

5.4 The proposed development is located within the air quality Focus Area which covers Marylebone Road from Marble Arch/Euston/King's Cross Junction (see Figure 2), one of 187 air quality Focus Areas in London, these being locations that not only exceed the EU annual mean limit value for nitrogen dioxide but also locations with high levels of human exposure.

Figure 2: Declared Focus Area and the Application Site Boundary

Local Air Quality Monitoring

5.5 Camden Council operates five automatic monitoring stations within its area. Two of these monitoring stations (B0 and CD9) are located within 1 km of the proposed development. The Council also operates a number of nitrogen dioxide monitoring sites using diffusion tubes prepared and analysed by Gradko (using the 50% TEA in acetone method), including five monitoring sites located within 1 km of the proposed development. Results for the years 2015 to 2021 are summarised in Table 2 and the monitoring locations are shown in Figure 4.

Table 2: Summary of Nitrogen Dioxide (NO_2) Monitoring (2015-2021) [a, b]

Site No.	Site Type	Location	2015	2016	2017	2018	2019	2020	2021
Automatic Monitors - Annual Mean (µg/m³)									
BL0	Urban Background	London Bloomsbury	**48.0**	**42.0**	38.0	36.0	32.0	28.0	27.0
CD9	Roadside	Euston Road	**90.0**	**88.0**	**83.0**	**82.0**	**70.0**	**43.0**	**48.0**
Objective			**40**						
Automatic Monitors - No. of Hours > 200 µg/m³									
BL0	Urban Background	London Bloomsbury	0	0	0	0	0	0	0
CD9	Roadside	Euston Road	**54**	**39**	**25**	18	7	0	1
Objective			**18**						
Diffusion Tubes - Annual Mean (µg/m³)									
CA10	Urban Background	Tavistock Gardens	**44.6**	39.7	**46.2**	35.4	33.9	26.8	22.3
CA11	Kerbside	Tottenham Court Road	**85.6**	**83.6**	**74.0**	**65.8**	**62.6**	**43.3**	**44.4**
CA21	Kerbside	Bloomsbury Street	**71.4**	**72.2**	**71.2**	**59.4**	**49.6**	29.5	33.2
CA27	Roadside	Euston Road (LAQN colocation)	-	-	-	-	**65.3**	**46.6**	**46.8**
CA29	Roadside	Endsleigh Gardens	-	-	-	-	**49.5**	35.3	34.5
Objective			**40**						

[a] Data taken from the 2021 Annual Status Report (ASR) (Camden Council, 2022).

[b] Exceedances of the objectives are shown in **bold**. Measured concentrations > 60 µg/m³, indicating that an exceedance of the 1-hour objective is likely, are shown in **bold and underlined**.

5.6 Exceedances of the annual mean nitrogen dioxide objective were measured at four diffusion tube monitoring sites in 2019, as well as the Euston Road (CD9) automatic monitor, which measured exceedances for all years presented. Monitoring locations where exceedances have been regularly recorded are either located on roads with high traffic flows (> 10,000 Annual Average Daily Traffic (AADT) flows), or in areas of poor dispersion due to tall buildings (street canyon effects).

5.7 Site CA11 measured concentrations greater than 60 µg/m³ from 2015 to 2019, whilst site CA21 measured similarly increased concentrations until 2017, as well as site CA27 in 2019. This indicates that the 1-hour mean nitrogen dioxide objective may also have been exceeded at these locations. Site CD9 measured exceedances of the 1-hour mean nitrogen dioxide objective in 2015-2017 but has achieved the 1-hour mean nitrogen dioxide objective since then.

5.8 Measured concentrations, at the majority of the sites presented, show a downward trend over the past five years. Figure 3 shows the downward trend at two of the automatic monitoring sites in

Camden. This trend is expected to continue, and accelerate, due to improvements in vehicle technology and turnover of vehicles in the fleet.

5.9 While 2020 and 2021 results have been presented in this Section for completeness, they are not relied upon in any way as they will not be representative of 'typical' air quality conditions due to the considerable impact of the Covid-19 pandemic on traffic volumes and thus pollutant concentrations.

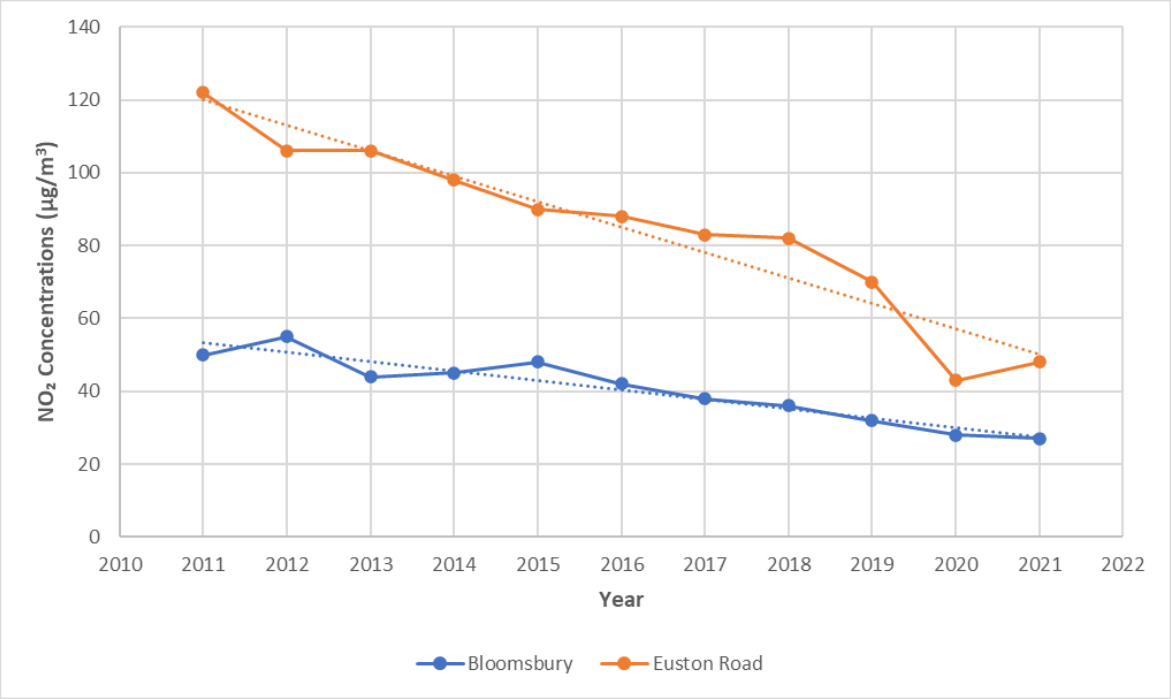

Figure 3: Measured Nitrogen Dioxide Concentrations at Euston Road and London Bloomsbury automatic monitoring stations between 2011-2021.

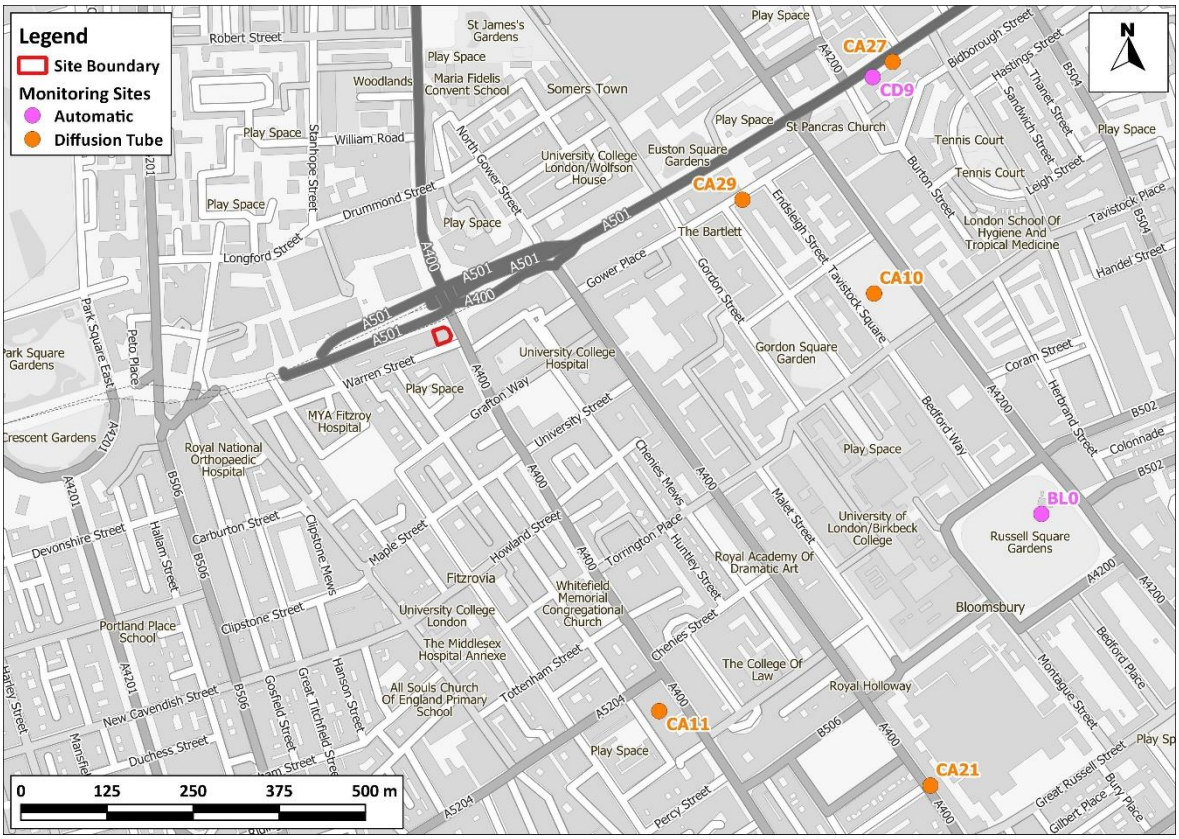

Figure 4: Monitoring Locations and the Application Site Boundary

5.10 The London Bloomsbury (BL0) and Euston Road (CD9) automatic monitoring stations both measure PM_{10} and $PM_{2.5}$ concentrations. Results for the years 2015 to 2021 are presented in Table 3, and show that levels at all sites are below the relevant objectives.

Table 3: Summary of PM_{10} and $PM_{2.5}$ Automatic Monitoring (2015-2021) [a]

Site ID	Site Type	Location	2015	2016	2017	2018	2019	2020	2021
PM_{10} Annual Mean (µg/m³)									
BL0	Urban Background	London Bloomsbury	22.0	20.0	19.0	17.0	18.0	16.0	16.0
CD9	Roadside	Euston Road	28.0	24.0	20.0	21.0	22.0	18.0	19.0
Objective			**40**						
PM_{10} No. Days >50 µg/m³									
BL0	Urban Background	London Bloomsbury	6	9	6	1	9	4	0
CD9	Roadside	Euston Road	5	10	3	2	8	2	2
Objective			**35**						
$PM_{2.5}$ Annual Mean (µg/m³)									
BL0	Urban Background	London Bloomsbury	11.0	12.0	13.0	10.0	11.0	9.0	9.0
CD9	Roadside	Euston Road	17.0	17.0	14.0	15.0	14.0	11.0	11.0
Objective / GLA Target			**25/10 [b]**						

[a] Data taken from the 2021 Annual Status Report (ASR) (Camden Council, 2022)

[b] The $PM_{2.5}$ objective, which is to be met by 2020, is not in Regulations and there is no requirement for local authorities to meet it. 10 µg/m³ is the GLA target for annual mean $PM_{2.5}$; again, there is no requirement for local authorities to meet this.

Exceedances of EU Limit Value

5.11 There are several AURN monitoring sites within the Greater London Urban Area that have measured exceedances of the annual mean nitrogen dioxide limit value (Defra, 2022c). Furthermore, Defra's roadside annual mean nitrogen dioxide concentrations (Defra, 2022b), which are used to identify and report exceedances of the limit value, identify exceedances of this limit value in 2019 along many roads in London, including Euston Road (A501) and Tottenham Court Road (A400) near to the proposed development. The Greater London Urban Area has thus been reported as exceeding the limit value for annual mean nitrogen dioxide concentrations. Defra's predicted concentrations for 2023 (Defra, 2020) identify continued exceedances of the limit value along Euston Road (A501). As such, there is considered to be a risk of a limit value exceedance in the vicinity of the proposed development by the time that it is operational.

5.12 Defra's Air Quality Plan requires the GLA to prepare an action plan that will *"deliver compliance in the shortest time possible"*, and the 2015 Plan assumed that a CAZ was required. The GLA has already implemented an LEZ and a ULEZ, thus the authority has effectively already implemented the required CAZ. These have been implemented as part of a package of measures including 12 Low Emission Bus Zones, Low Emission Neighbourhoods, the phasing out of diesel buses and taxis and other measures within the Mayors Transport Strategy.

Background Concentrations

5.13 Estimated background concentrations at the proposed development are set out in Table 4 and are all below the objectives. It should be noted that, the estimated concentrations are much higher than those measured at nearby urban background monitoring sites, such as London Bloomsbury, and therefore is likely to be overestimate.

Table 4: Estimated Annual Mean Background Pollutant Concentrations (µg/m^3)

Year	NO_2	PM_{10}	$PM_{2.5}$
2019	39.6	20.2	12.9
2023	34.6	18.9	12.1
Objectives / GLA Target	**40**	**40**	**25/10** [a]

[a] The $PM_{2.5}$ objective, which is to be met by 2020, is not in Regulations and there is no requirement for local authorities to meet it. 10 µg/m^3 is the GLA target for annual mean $PM_{2.5}$; again, there is no requirement for local authorities to meet this

6 Impact Assessment

Impacts of the Development

6.1 There is some potential for localised dust impacts during construction of the development. The highest risk of dust impacts would occur during demolition of the existing 6th floor, with a lower risk of dust impacts once the new floor, providing four flats, is under construction. However, the section of building to be demolished is relatively small; the site is, therefore, considered *Low Risk*, in accordance with the GLA's SPG (GLA, 2014b).

Impacts upon the Development

6.2 The four new flats on the 6th floor would represent relevant exposure in the context of the air quality objectives. The apartments would be representative with regards to the annual mean and 1-hour mean nitrogen dioxide, and the annual mean and 24-hour mean particulate matter (PM_{10}) objectives. The outdoor space is only considered as relevant exposure in the context of the 1-hour nitrogen dioxide objective.

6.3 Warren Court is approximately 30 m from the main carriageway of Euston Road, and 14 m from the slip road, whilst it is approximately 4 m from both Tottenham Court Road and Warren Street. The main carriageway of Euston Road is in a cutting at its closest point to the site, and the slip road is level with ground-level at the site. The proposed development would introduce four new properties at 6th floor only, at approximately 20 m above ground-level (at least 25 m above Euston Road).

6.4 The road layout in Warren Street is representative of 'canyon' conditions, although the proposed 6th floor would be higher than the buildings on the opposite side of the road, and thus the receptors would be located above the top of the canyon, with better dispersion conditions. Additionally, there are tall buildings alongside Euston Road and Tottenham Court Road; however, the distances between these buildings are greater and thus allow more space for the pollutants' dilution.

6.5 Measurements in similar urban environments have shown that nitrogen dioxide concentrations reduce significantly with height above the road, as shown in Figure 5. These demonstrate that nitrogen dioxide concentrations reduce substantially with height above the road and indicated that at 3rd floor and above, concentrations are similar to background levels (Air Quality Consultants Ltd, 2015). It is therefore reasonable to assume that at the 6th floor, where new receptors are proposed, concentrations will be close to background levels.

6.6 The measured and estimated background concentrations presented in Table 2, Table 3 and Table 4 indicate that the PM_{10} and $PM_{2.5}$ objectives are being achieved at the development site. Defra's estimated background annual mean nitrogen dioxide concentration is slightly below the objective in the base year (2019); however, concentrations in the anticipated year of first occupation are lower

(see Table 4). Also, as stated in Paragraph 5.13, Defra's background predictions are higher compared to local measurements, indicating an overprediction of concentrations.

6.7 On the basis of the above, it is judged that air quality for future residents of the proposed development is acceptable.

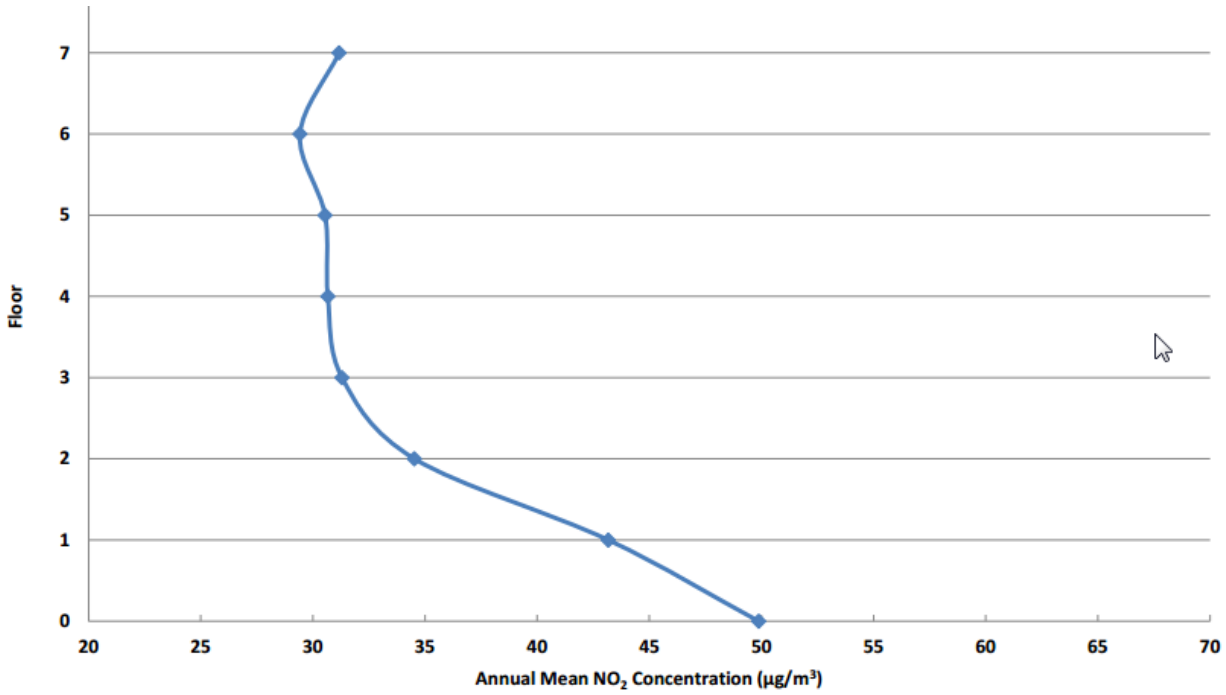

Figure 5: Measured Nitrogen Dioxide Concentrations at Various Heights

Based on diffusion tube measurements in Bristol City Centre (Air Quality Consultants Ltd, 2015)

Significance of Air Quality Effects

6.8 The operational air quality effects without mitigation are judged to be 'not significant'. This professional judgement is made in accordance with the methodology set out in Appendix A2 and takes account of the assessment that:

- the new flats will be located at a height where concentrations are expected to be close to background levels, and as seen in Table 4, the concentrations are all below the relevant objectives at the first year of occupation;
- the proposed development is 'car-free' and does not include a centralised energy plant, and thus will not have significant point sources of emissions, and therefore will not significantly affect air quality conditions at existing receptors; and
- the construction works will require appropriate mitigation and will be Low Risk.

7 ‘Air Quality Neutral’

7.1 The purpose of the London Plan’s requirement that development proposals be ‘air quality neutral’ is to prevent the gradual deterioration of air quality throughout Greater London. The ‘air quality neutrality’ of a proposed development, as assessed in this section, does not directly indicate the potential of the proposed development to have significant impacts on human health (this has been assessed separately in the previous section). The air quality assessment has been undertaken using the latest GLA’s London Plan Guidance (Air Quality Neutral) (GLA, 2021b), which is currently in consultation stage.

7.2 The proposed development, classified as a ‘minor’ development, will not introduce any additional car-parking spaces at the site, and it is anticipated that the proposed development will not introduce any centralised energy plant. According to Paragraphs 3.1.2 and 4.1.2 within the GLA’s Air Quality Neutral guidance (GLA, 2021b), the proposed development is therefore air quality neutral. In the event that gas-fired boilers are required to be installed in order to meet the energy demand, the proposed development will continue to be air quality neutral as long as the NOx emission is less than 40 mg/kWh.

8 Mitigation

Impact of the Development

8.1 There is potential for the construction phase of the development to lead to localised dust impacts, particularly during the demolition and construction phases. Suitable measures for a Low Risk site, similar to those described in Appendix A4 will be put in place to minimise dust impacts in accordance with the GLA's SPG (GLA, 2014b). The proposed development will also adopt a Dust Management Plan (DMP) in order to further minimise the environmental impacts of the construction works.

Impact upon the Development

8.2 It is considered that pollutant concentrations will be below the air quality objectives, and air quality for the occupants will be acceptable. The flats would be located at 6th floor, as far as possible from the roads, and thus no further mitigation is required.

9 Conclusions

9.1 The construction works have the potential to create dust. During construction it will therefore be necessary to apply a package of mitigation measures to minimise dust emissions. With these measures in place, it is expected that any residual effects will be 'not significant'.

9.2 The proposed development will introduce four new residential flats at 6th floor. At this location pollutant concentrations are likely to be significantly lower than at ground floor and close to background levels. Annual mean nitrogen dioxide, PM_{10} and $PM_{2.5}$ concentrations at the four new flats are predicted to be below the relevant objectives in the opening year, and thus will experience acceptable air quality.

9.3 Overall, the air quality effects of the proposed development are judged to be 'not significant'.

9.4 The proposed development, as a 'minor' development, complies with the requirement that all new developments in London should be at least air quality neutral.

9.5 Taking into account these conclusions, it is judged that the proposed development is consistent with Paragraph 185 of the NPPF, being appropriate for its location both in terms of its effects on the local air quality environment and the air quality conditions for future residents. It is also consistent with Paragraph 186, as it will not affect compliance with relevant limit values or national objectives. The proposed development is also compliant with Policy SI 1 of the London Plan as it is better than 'air quality neutral'.

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11 Glossary

AQC	Air Quality Consultants
AQMA	Air Quality Management Area
AURN	Automatic Urban and Rural Network
Defra	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
EPUK	Environmental Protection UK
Exceedance	A period of time when the concentration of a pollutant is greater than the appropriate air quality objective. This applies to specified locations with relevant exposure
EU	European Union
Focus Area	Location that not only exceeds the EU annual mean limit value for NO_2 but also has a high level of human exposure
GLA	Greater London Authority
IAQM	Institute of Air Quality Management
JAQU	Joint Air Quality Unit
LAQM	Local Air Quality Management
LB	London Borough
LEZ	Low Emission Zone
µg/m^3	Microgrammes per cubic metre
NO_2	Nitrogen dioxide
NPPF	National Planning Policy Framework
NRMM	Non-road Mobile Machinery
Objectives	A nationally defined set of health-based concentrations for nine pollutants, seven of which are incorporated in Regulations, setting out the extent to which the standards should be achieved by a defined date. There are also vegetation-based objectives for sulphur dioxide and nitrogen oxides
PM_{10}	Small airborne particles, more specifically particulate matter less than 10 micrometres in aerodynamic diameter
$PM_{2.5}$	Small airborne particles less than 2.5 micrometres in aerodynamic diameter
PPG	Planning Practice Guidance

SPG	Supplementary Planning Guidance
Standards	A nationally defined set of concentrations for nine pollutants below which health effects do not occur or are minimal
TEA	Triethanolamine – used to absorb nitrogen dioxide
ULEZ	Ultra Low Emission Zone
WHO	World Health Organisation
ZEC	Zero Emission Capable

12 Appendices

A1 London-Specific Policies and Measures 35
A2 EPUK & IAQM Planning for Air Quality Guidance 38
A3 Professional Experience 44
A4 Construction Mitigation 45

A1 London-Specific Policies and Measures

London Plan

Development Plans

A1.1 Policy SI 1 of the London Plan (GLA, 2021a) states the following regarding strategic development plans:

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.

London Environment Strategy

A1.2 The air quality chapter of the London Environment Strategy sets out three main objectives, each of which is supported by sub-policies and proposals. The Objectives and their sub-policies are set out below:

"Objective 4.1: Support and empower London and its communities, particularly the most disadvantaged and those in priority locations, to reduce their exposure to poor air quality.

- *Policy 4.1.1 Make sure that London and its communities, particularly the most disadvantaged and those in priority locations, are empowered to reduce their exposure to poor air quality*
- *Policy 4.1.2 Improve the understanding of air quality health impacts to better target policies and action*

Objective 4.2: Achieve legal compliance with UK and EU limits as soon as possible, including by mobilising action from London Boroughs, government and other partners

- *Policy 4.2.1 Reduce emissions from London's road transport network by phasing out fossil fuelled vehicles, prioritising action on diesel, and enabling Londoners to switch to more sustainable forms of transport*
- *Policy 4.2.2 Reduce emissions from non-road transport sources, including by phasing out fossil fuels*
- *Policy 4.2.3 Reduce emissions from non-transport sources, including by phasing out fossil fuels*
- *Policy 4.2.4 The Mayor will work with the government, the London boroughs and other partners to accelerate the achievement of legal limits in Greater London and improve air quality*

- *Policy 4.2.5 The Mayor will work with other cities (here and internationally), global city and industry networks to share best practice, lead action and support evidence based steps to improve air quality*

Objective 4.3: Establish and achieve new, tighter air quality targets for a cleaner London by transitioning to a zero emission London by 2050, meeting world health organization health-based guidelines for air quality

- *Policy 4.3.1 The Mayor will establish new targets for $PM_{2.5}$ and other pollutants where needed. The Mayor will seek to meet these targets as soon as possible, working with government and other partners*
- *Policy 4.3.2 The Mayor will encourage the take up of ultra low and zero emission technologies to make sure London's entire transport system is zero emission by 2050 to further reduce levels of pollution and achieve WHO air quality guidelines*
- *Policy 4.3.3 Phase out the use of fossil fuels to heat, cool and maintain London's buildings, homes and urban spaces, and reduce the impact of building emissions on air quality*
- *Policy 4.3.4 Work to reduce exposure to indoor air pollutants in the home, schools, workplace and other enclosed spaces"*

A1.3 While the policies targeting transport sources are significant, there are less obvious ones that will also require significant change. In particular, the aim to phase out fossil-fuels from building heating and cooling and from NRMM will demand a dramatic transition.

Low Emission Zone (LEZ)

A1.4 The LEZ was implemented as a key measure to improve air quality in Greater London. It entails charges for vehicles entering Greater London not meeting certain emissions criteria, and affects diesel-engined lorries, buses, coaches, large vans, minibuses and other specialist vehicles derived from lorries and vans. Since 1 March 2021, a standard of Euro VI has applied for HGVs, buses and coaches, while a standard of Euro 3 has applied for large vans, minibuses and other specialist diesel vehicles since 2012.

Ultra Low Emission Zone (ULEZ)

A1.5 London's ULEZ was introduced on 8 April 2019. The ULEZ currently operates 24 hours a day, 7 days a week in the same area as the current Congestion Charging zone. All cars, motorcycles, vans and minibuses are required to meet exhaust emission standards (ULEZ standards) or pay an additional daily charge to travel within the zone. The ULEZ standards are Euro 3 for motorcycles, Euro 4 for petrol cars, vans and minibuses and Euro 6 for diesel cars, vans and minibuses. The ULEZ does not include any requirements relating to heavy vehicle (HGV, coach and bus) emissions, as these are addressed by the amendments to the LEZ described in Paragraph A1.4.

A1.6 The ULEZ will covers the entire area within the North and South Circular roads, applying the emissions standards set out in Paragraph A1.5.

Other Measures

A1.7 Since 2018, all taxis presented for licencing for the first time had to be zero emission capable (ZEC). This means they must be able to travel a certain distance in a mode which produces no air pollutants, and all private hire vehicles (PHVs) presented for licensing for the first time had to meet Euro 6 emissions standards. Since January 2020, all newly manufactured PHVs presented for licensing for the first time had to be ZEC (with a minimum zero emission range of 10 miles). The Mayor's aim is that the entire taxi and PHV fleet will be made up of ZEC vehicles by 2033.

A1.8 The Mayor has also proposed to make sure that TfL leads by example by cleaning up its bus fleet, implementing the following measures:

- TfL will procure only hybrid or zero emission double-decker buses from 2018;
- a commitment to providing 3,100 double decker hybrid buses by 2019 and 300 zero emission single-deck buses in central London by 2020;
- introducing 12 Low Emission Bus Zones by 2020;
- investing £50m in Bus Priority Schemes across London to reduce engine idling; and
- retrofitting older buses to reduce emissions (selective catalytic reduction (SCR) technology has already been fitted to 1,800 buses, cutting their NOx emissions by around 88%).

A2 EPUK & IAQM Planning for Air Quality Guidance

A2.1 The guidance issued by EPUK and IAQM (Moorcroft and Barrowcliffe et al, 2017) is comprehensive in its explanation of the place of air quality in the planning regime. Key sections of the guidance not already mentioned above are set out below.

Air Quality as a Material Consideration

"Any air quality issue that relates to land use and its development is capable of being a material planning consideration. The weight, however, given to air quality in making a planning application decision, in addition to the policies in the local plan, will depend on such factors as:

- *the severity of the impacts on air quality;*
- *the air quality in the area surrounding the proposed development;*
- *the likely use of the development, i.e. the length of time people are likely to be exposed at that location; and*
- *the positive benefits provided through other material considerations".*

Recommended Best Practice

A2.2 The guidance goes into detail on how all development proposals can and should adopt good design principles that reduce emissions and contribute to better air quality management. It states:

"The basic concept is that good practice to reduce emissions and exposure is incorporated into all developments at the outset, at a scale commensurate with the emissions".

A2.3 The guidance sets out a number of good practice principles that should be applied to all developments that:

- include 10 or more dwellings;
- where the number of dwellings is not known, residential development is carried out on a site of more than 0.5 ha;
- provide more than 1,000 m^2 of commercial floorspace;
- are carried out on land of 1 ha or more.

A2.4 The good practice principles are that:

- New developments should not contravene the Council's Air Quality Action Plan, or render any of the measures unworkable;
- Wherever possible, new developments should not create a new "street canyon", as this inhibits pollution dispersion;

- Delivering sustainable development should be the key theme of any application;
- New development should be designed to minimise public exposure to pollution sources, e.g. by locating habitable rooms away from busy roads;
- The provision of at least 1 Electric Vehicle (EV) "rapid charge" point per 10 residential dwellings and/or 1000 m^2 of commercial floorspace. Where on-site parking is provided for residential dwellings, EV charging points for each parking space should be made available;
- Where development generates significant additional traffic, provision of a detailed travel plan (with provision to measure its implementation and effect) which sets out measures to encourage sustainable means of transport (public, cycling and walking) via subsidised or free-ticketing, improved links to bus stops, improved infrastructure and layouts to improve accessibility and safety;
- All gas-fired boilers to meet a minimum standard of <40 mgNOx/kWh;
- Where emissions are likely to impact on an AQMA, all gas-fired CHP plant to meet a minimum emissions standard of:
    - Spark ignition engine: 250 mgNOx/Nm^3;
    - Compression ignition engine: 400 mgNOx/Nm^3;
    - Gas turbine: 50 mgNOx/Nm^3.
- A presumption should be to use natural gas-fired installations. Where biomass is proposed within an urban area it is to meet minimum emissions standards of 275 mgNOx/Nm^3 and 25 mgPM/Nm^3.

A2.5 The guidance also outlines that offsetting emissions might be used as a mitigation measure for a proposed development. However, it states that:

"It is important that obligations to include offsetting are proportional to the nature and scale of development proposed and the level of concern about air quality; such offsetting can be based on a quantification of the emissions associated with the development. These emissions can be assigned a value, based on the "damage cost approach" used by Defra, and then applied as an indicator of the level of offsetting required, or as a financial obligation on the developer. Unless some form of benchmarking is applied, it is impractical to include building emissions in this approach, but if the boiler and CHP emissions are consistent with the standards as described above then this is not essential".

A2.6 The guidance offers a widely used approach for quantifying costs associated with pollutant emissions from transport. It also outlines the following typical measures that may be considered to offset emissions, stating that measures to offset emissions may also be applied as post assessment mitigation:

- Support and promotion of car clubs;
- Contributions to low emission vehicle refuelling infrastructure;
- Provision of incentives for the uptake of low emission vehicles;
- Financial support to low emission public transport options; and
- Improvements to cycling and walking infrastructures.

Screening

Impacts of the Local Area on the Development

"There may be a requirement to carry out an air quality assessment for the impacts of the local area's emissions on the proposed development itself, to assess the exposure that residents or users might experience. This will need to be a matter of judgement and should take into account:

- *the background and future baseline air quality and whether this will be likely to approach or exceed the values set by air quality objectives;*
- *the presence and location of Air Quality Management Areas as an indicator of local hotspots where the air quality objectives may be exceeded;*
- *the presence of a heavily trafficked road, with emissions that could give rise to sufficiently high concentrations of pollutants (in particular nitrogen dioxide), that would cause unacceptably high exposure for users of the new development; and*
- *the presence of a source of odour and/or dust that may affect amenity for future occupants of the development".*

Impacts of the Development on the Local Area

A2.7 The guidance sets out two stages of screening criteria that can be used to identify whether a detailed air quality assessment is required, in terms of the impact of the development on the local area. The first stage is that you should proceed to the second stage if any of the following apply:

- 10 or more residential units or a site area of more than 0.5 ha residential use; and/or
- more than 1,000 m^2 of floor space for all other uses or a site area greater than 1 ha.

A2.8 Coupled with any of the following:

- the development has more than 10 parking spaces; and/or
- the development will have a centralised energy facility or other centralised combustion process.

A2.9 If the above do not apply then the development can be screened out as not requiring a detailed air quality assessment of the impact of the development on the local area. If they do apply then you proceed to stage 2, which sets out indicative criteria for requiring an air quality assessment. The stage 2 criteria relating to vehicle emissions are set out below:

- the development will lead to a change in LDV flows of more than 100 AADT within or adjacent to an AQMA or more than 500 AADT elsewhere;
- the development will lead to a change in HDV flows of more than 25 AADT within or adjacent to an AQMA or more than 100 AADT elsewhere;
- the development will lead to a realigning of roads (i.e. changing the proximity of receptors to traffic lanes) where the change is 5m or more and the road is within an AQMA;
- the development will introduce a new junction or remove an existing junction near to relevant receptors, and the junction will cause traffic to significantly change vehicle acceleration/deceleration, e.g. traffic lights or roundabouts;
- the development will introduce or change a bus station where bus flows will change by more than 25 AADT within or adjacent to an AQMA or more than 100 AADT elsewhere; and
- the development will have an underground car park with more than 100 movements per day (total in and out) with an extraction system that exhausts within 20 m of a relevant receptor.

A2.10 The criteria are more stringent where the traffic impacts may arise on roads where concentrations are close to the objective. The presence of an AQMA is taken to indicate the possibility of being close to the objective, but where whole authority AQMAs are present and it is known that the affected roads have concentrations below 90% of the objective, the less stringent criteria are likely to be more appropriate.

A2.11 On combustion processes (including standby emergency generators and shipping) where there is a risk of impacts at relevant receptors, the guidance states that:

"Typically, any combustion plant where the single or combined NOx emission rate is less than 5 mg/sec is unlikely to give rise to impacts, provided that the emissions are released from a vent or stack in a location and at a height that provides adequate dispersion. As a guide, the 5 mg/s criterion equates to a 450 kW ultra-low NOx gas boiler or a 30kW CHP unit operating at <95mg/Nm^3.

In situations where the emissions are released close to buildings with relevant receptors, or where the dispersion of the plume may be adversely affected by the size and/or height of adjacent buildings (including situations where the stack height is lower than the receptor) then consideration will need to be given to potential impacts at much lower emission rates.

Conversely, where existing nitrogen dioxide concentrations are low, and where the dispersion conditions are favourable, a much higher emission rate may be acceptable".

A2.12 Should none of the above apply then the development can be screened out as not requiring a detailed air quality assessment of the impact of the development on the local area, provided that professional judgement is applied; the guidance importantly states the following:

"The criteria provided are precautionary and should be treated as indicative. They are intended to function as a sensitive 'trigger' for initiating an assessment in cases where there is a possibility of significant effects arising on local air quality. This possibility will, self-evidently, not be realised in many cases. The criteria should not be applied rigidly; in some instances, it may be appropriate to amend them on the basis of professional judgement, bearing in mind that the objective is to identify situations where there is a possibility of a significant effect on local air quality".

A2.13 Even if a development cannot be screened out, the guidance is clear that a detailed assessment is not necessarily required:

"The use of a Simple Assessment may be appropriate, where it will clearly suffice for the purposes of reaching a conclusion on the significance of effects on local air quality. The principle underlying this guidance is that any assessment should provide enough evidence that will lead to a sound conclusion on the presence, or otherwise, of a significant effect on local air quality. A Simple Assessment will be appropriate, if it can provide this evidence. Similarly, it may be possible to conduct a quantitative assessment that does not require the use of a dispersion model run on a computer".

A2.14 The guidance also outlines what the content of the air quality assessment should include, and this has been adhered to in the production of this report.

Assessment of Significance

A2.15 The guidance recommends that the assessment of significance should be based on professional judgement, with the overall air quality impact of the development described as either 'significant' or 'not significant'. In drawing this conclusion, the following factors should be taken into account:

- the existing and future air quality in the absence of the development;
- the extent of current and future population exposure to the impacts;
- the influence and validity of any assumptions adopted when undertaking the prediction of impacts;
- the potential for cumulative impacts and, in such circumstances, several impacts that are described as '*slight*' individually could, taken together, be regarded as having a significant effect for the purposes of air quality management in an area, especially where it is proving difficult to reduce concentrations of a pollutant. Conversely, a '*moderate*' or '*substantial*'

impact may not have a significant effect if it is confined to a very small area and where it is not obviously the cause of harm to human health; and

- the judgement on significance relates to the consequences of the impacts; will they have an effect on human health that could be considered as significant? In the majority of cases, the impacts from an individual development will be insufficiently large to result in measurable changes in health outcomes that could be regarded as significant by health care professionals.

A2.16 The guidance is clear that other factors may be relevant in individual cases. It also states that the effect on the residents of any new development where the air quality is such that an air quality objective is not met will be judged as significant. For people working at new developments in this situation, the same will not be true as occupational exposure standards are different, although any assessment may wish to draw attention to the undesirability of the exposure.

A2.17 A judgement of the significance should be made by a competent professional who is suitably qualified. A summary of the professional experience of the staff contributing to this assessment is provided in Appendix A3.

A3 Professional Experience

Penny Wilson, BSc (Hons) CSci MIEnvSc MIAQM

Ms Wilson is an Associate Director with AQC, with more than 20 years' relevant experience in the field of air quality. She has been responsible for numerous assessments for a range of infrastructure developments including power stations, road schemes, ports, airports and residential/commercial developments. The assessments have covered operational and construction impacts, including odours. She also provides services to local authorities in support of their LAQM duties, including the preparation of Review and Assessment and Action Plan reports, as well as audits of Air Quality Assessments submitted with planning applications. She has provided expert evidence to a number of Public Inquiries, and is a Member of the Institute of Air Quality Management and a Chartered Scientist.

George Chousos, BSc MSc AMIEnvSc AMIAQM

Mr Chousos is an Assistant Consultant with AQC, having joined in May 2019. Prior to joining AQC, he completed an MSc in Air Pollution Management and Control at the University of Birmingham, specialising in air pollution control technologies and management, and data processing using R. He also holds a degree in Environmental Geoscience from the University of Cardiff, where he undertook a year in industry working in the field of photo-catalytic technology. He is now gaining experience in the field of air quality monitoring and assessment.

A4 Construction Mitigation

A4.1 The following is a set of best-practice measures from the GLA guidance (GLA, 2014b) that should be incorporated into the specification for the works. These measures should be written into a Dust Management Plan. Some of the measures may only be necessary during specific phases of work, or during activities with a high potential to produce dust, and the list should be refined and expanded upon in liaison with the construction contractor when producing the Dust Management Plan.

Site Management

- 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 are being carried out and during prolonged dry or windy conditions; and
- record any exceptional incidents that cause dust and air quality pollutant emissions, either on or off the site, and ensure that the action taken to resolve the situation is recorded in the log book.

Preparing and Maintaining the Site

- Plan the 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 the site boundary that are at least as high as any stockpiles on site;
- fully enclose 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; and
- remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below;

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 standards set within the GLA's Control of Dust and Emissions During Construction and Demolition SPG. This outlines that, from 1 September 2015, all NRMM of net power 37 kW to 560 kW used on the site of a major development in Greater London must meet Stage IIIA of EU Directive 97/68/EC (The European Parliament and the Council of the European Union, 1997) and its subsequent amendments as a minimum. NRMM used on any site within the Central Activity Zone or Canary Wharf will be required to meet Stage IIIB of the Directive as a minimum. From 1 September 2020 NRMM used on any site within Greater London will be required to meet Stage IIIB of the Directive as a minimum, while NRMM used on any site within the Central Activity Zone or Canary Wharf will be required to meet Stage IV of the Directive as a minimum;
- 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; and
- implement a Travel Plan that supports and encourages sustainable staff 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 suppression/mitigation, using recycled water where possible and appropriate;
- use enclosed chutes, conveyors and covered skips; and
- minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.

Waste Management

- Reuse and recycle waste to reduce dust from waste materials; and
- avoid bonfires and burning of waste materials.

Measures Specific to 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);

- ensure water suppression is used during demolition operations;
- avoid explosive blasting, using appropriate manual or mechanical alternatives; and
- bag and remove any biological debris or damp down such material before demolition.

Measures Specific to Construction

- Avoid scabbling (roughening of concrete surfaces), if possible; and
- 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.