Air Quality Assessment:
Royal National Throat, Nose and Ear Hospital, 330 Grays Inn Road

February 2023

Experts in air quality management & assessment

Document Control

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Executive Summary

The air quality impacts associated with the proposed mixed-use development of the Royal National Throat, Nose and Ear Hospital, 330 Gray's Inn Road have been assessed. The development will consist of residential, hotel, office and gym/leisure use. An assessment was undertaken in 2020 to support the application for a very similar scheme (2020/5593/P). This assessment provides an update to the 2020 assessment to support the new application for the site. The proposed development is the same as consented (2020/5593/P) with the exception that it incorporates the UCL uses within basement of the development. This updated assessment also addresses comments and Condition 50 applied to the consented scheme.

The assessment has demonstrated that future residents and users of the proposed development will experience acceptable air quality, with pollutant concentrations below the air quality objectives. As such, additional mitigation is not required beyond that which is included within the design of the development

TO BE UPDATED ON RECEPIT OF DEVELOPMENT TRAFFIC DATA.

A number of mitigation measures will be implemented to minimise the impacts in the local vicinity. Steer Group have developed two Travel Plans, listing proposed actions to reduce development related traffic, including promotion of public transport, walking, cycling, car clubs and smarter working, and only providing accessible parking for 3% of the total residential units.

The proposed development also includes backup generators to be situated on the office building roof. The assessment has demonstrated that these will have an insignificant impact on local air quality, assuming that they are tested no more than monthly on-load.

During the construction works, a range of best practice mitigation measures will be implemented to reduce dust emissions and the overall effect will be 'not significant'; appropriate measures have been set out in this report, to be included in the Dust Management Plan for the works.

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

The proposed development has also been shown to meet the London Plan's requirement that new developments are at least 'air quality neutral'.

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Figures

1 Introduction

1.1 This report describes the potential air quality impacts associated with the proposed mixed-use development of 330 Gray's Inn Road, Camden. The proposed development is described as:

"Redevelopment of the former Royal National Throat, Nose and Ear hospital, comprising: Retention of 330 Gray's Inn Road and a two storey extension for use as hotel, demolition of all other buildings, the erection of a part 13 part 9 storey building plus upper and lower ground floors for use as a hotel including a café and restaurant; covered courtyard; external terraces; erection of a 7 storey building plus upper and lower ground floors for use as office together with terraces; erection of a 10 storey building plus upper and lower ground floors for use as residential on Wicklow Street and office space at lower ground and basement floors; erection of a 5 storey building plus upper and lower ground floors for use as residential on Swinton Street and associated residential amenity space; together with a gymnasium; new basement; rooftop and basement plant; servicing; cycle storage and facilities; refuse storage; landscaping and other ancillary and associated works."

1.2 An air quality assessment for a very similar scheme was previously undertaken in December 2020 to support the planning application (ref 2020/5593/P). Permission was granted for the proposed development in July 2022, subject to conditions. This assessment provides an update to the 2020 assessment to support the new application for the site. The proposed development is the same as consented (2020/5593/P) with the exception that it incorporates the UCL uses within basement of the development. This updated assessment also addresses comments and Condition 50 applied to the consented scheme.

1.3 Condition 50 "*Additional Air Quality Mitigation – Swinton Street Residential Building*" states:

"*Prior to commencement of any above ground works on the Swinton Street residential building, a revised air quality assessment report, written in accordance with the relevant current guidance, for the existing site and proposed residential development on Swinton Street shall be submitted to and approved by the Local Planning Authority. The assessment shall assess the current baseline situation in the vicinity of the proposed development. The report shall include all calculations and baseline data, and be set out so that the Local Planning Authority can fully audit the report and critically analyse the content and recommendations. If required a scheme for air pollution mitigation measures based on the findings of the report shall be submitted to and approved by the Local Planning Authority prior to development. This shall include mitigation including non-openable windows for any residential areas where the air quality is more than 5% over the WHO Standard, Particulate Matter filtration, and a requirement on the RP to advise all residents about air quality issues where housing is in a location which has poor air quality*."

1.4 This assessment updates the air quality assessment from 2020 in accordance with the latest data and best practice guidance and the latest scheme.

Site Setting

1.5 The Site lies within a borough-wide Air Quality Management Area (AQMA) declared by the London Borough of Camden (LB of Camden) for exceedances of the annual mean nitrogen dioxide (NO_2) objective. It is also within the GLA's King's Cross / Caledonian Road Area air quality Focus Area; this is a location with high levels of human exposure where the annual mean limit value for NO_2 is exceeded.

1.6 The proposed development will introduce new residential exposure into an area of potentially poor air quality, thus an assessment is required to determine the air quality conditions that future residents will experience. The proposed development will also lead to changes in vehicle flows on local roads, which may impact on air quality at existing residential properties along the affected road network. The main air pollutants of concern related to road traffic emissions are NO_2 and fine particulate matter (PM_{10} and $PM_{2.5}$).

1.7 The new homes, hotel and offices within the proposed development will be provided with heat and hot water by air source heat pumps (ASHPs) and electrical boilers, which have zero associated local emissions. The proposals for the development also include backup-power generators, the emissions from which could impact upon air quality at existing residential properties and the new residential properties within the development itself. The main air pollutants of concern related to back-up power generators are NO_2, PM_{10} and $PM_{2.5}$.

1.8 The hotel within the proposed development will include commercial cooking premises which will discharge emissions associated with cooking activities and therefore could also could impact upon air quality at existing residential properties and the new residential properties within the development itself. The Council in pre-application discussions requested this source be considered.

1.9 The proposed development will also relocate flues serving the UCL Ear Institute building which will serve the fume cupboards located within the basement. These flues may emit a range of gases, and therefore the impacts of emissions from the flues on air quality at existing residential properties and for future residents and users of the development have been assessed.

1.10 The location and setting of the proposed development are shown in Figure 1, along with the relevant nearby Focus Areas.

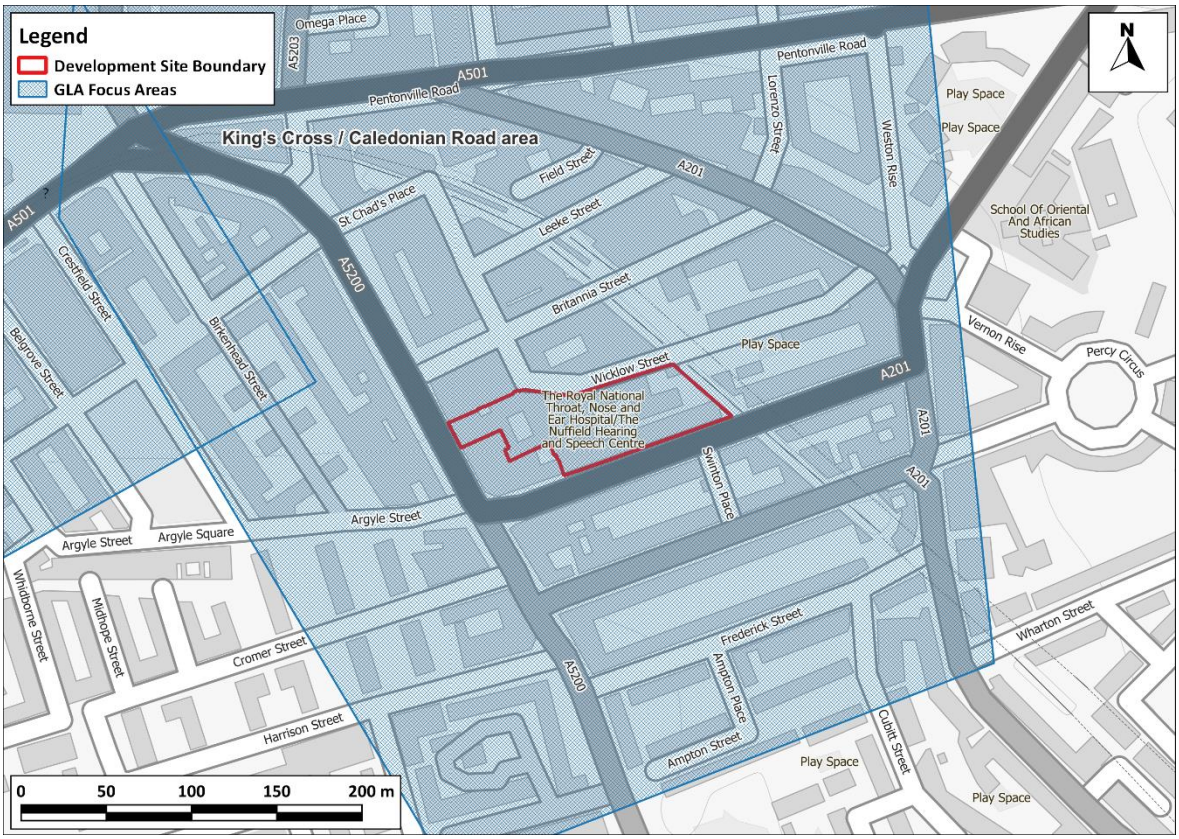

Figure 1: Proposed Development Setting in the Context of Air Quality

1.11 The Greater London Authority's (GLA's) London Plan (GLA, 2021) requires new developments to be air quality neutral. The air quality neutrality of the proposed development has been assessed following the methodology provided in the latest GLA's London Plan Guidance (Air Quality Neutral) (GLA, 2021), which is currently in consultation stage).

1.12 The GLA has also released Supplementary Planning Guidance on the Control of Dust and Emissions from Construction and Demolition (GLA, 2014b). The SPG outlines a risk assessment approach for construction dust assessment and helps determine the mitigation measures that will need to be applied. A construction dust assessment has been undertaken and the appropriate mitigation has been set out.

1.13 This report describes local air quality conditions in 2022, and the predicted air quality in the future assuming that the proposed development does, or does not proceed. The assessment of traffic-related impacts focuses on 2025, which is the anticipated year of opening. The assessment of construction dust impacts focuses on the anticipated duration of the works.

1.14 This report has been prepared taking into account all relevant local and national guidance and regulations.

2 Policy Context

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.

The Environmental Permitting (England and Wales) (Amendment) Regulations 2018

2.3 The Medium Combustion Plant Directive (MCPD) (The European Parliament and the Council of the European Union, 2015) regulates pollutant emissions from combustion plant with a rated input between 1 and 50 megawatts (MW_{th}) and was transposed into UK law in January 2018 through an amendment to the Environmental Permitting Regulations (2018). The legislation sets emission limits to be applied from December 2018 for new plant and from 2025 or 2030 for existing plant (depending on the rated input). In addition to addressing emissions from plant with a rated input of 1 to 50 MW_{th}, as required by the MCPD, the amendment also introduces emission limits on generator plant, regardless of their rated input. Generators whose sole purpose is maintaining power supply at a site during an on-site emergency, that are operated for the purpose of testing/maintenance for no more than 50 hours per year, will be exempt from the emission limits.

2.4 The backup generator within the proposed development will not require a permit under these regulations, as the generator will be tested for fewer than 50 hours per year.

Clean Air Act 1993 & Environmental Protection Act

2.5 Small combustion plant of less than 20 MW net rated thermal input are controlled under the Clean Air Act 1993 (1993). This requires the local authority to approve the chimney height. Plant which are smaller than 366 kW have no such requirement. The local authority's approval will, therefore, be required for the plant to be installed in the proposed development.

2.6 Measures to ensure adequate dispersion of emissions from discharging stacks and vents are included in Technical Guidance Note D1 (Dispersion) (1993), issued in support of the Environmental Protection Act (1990).

Clean Air Strategy 2019

2.7 The Clean Air Strategy (Defra, 2019b) sets out a wide range of actions by which the 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.

Reducing Emissions from Road Transport: Road to Zero Strategy

2.8 The Office for Low Emission Vehicles (OLEV) and Department for Transport (DfT) published a Policy Paper (DfT, 2018) in July 2018 outlining how the government will support the transition to zero tailpipe emission road transport and reduce tailpipe emissions from conventional vehicles during the transition. This paper affirms the Government's pledge to end the sale of new conventional petrol and diesel cars and vans by 2040, and states that the Government expects the majority of new cars and vans sold to be 100% zero tailpipe emission and all new cars and vans to have significant zero tailpipe emission capability by this year, and that by 2050 almost every car and van should have zero tailpipe emissions. It states that the Government wants to see at least 50%, and as many as 70%, of new car sales, and up to 40% of new van sales, being ultra-low emission by 2030.

2.9 The paper sets out a number of measures by which Government will support this transition, but is clear that Government expects this transition to be industry and consumer led. The Government has since announced that the phase-out date for the sale of new petrol and diesel cars and vans will be brought forward to 2030 and that all new cars and vans must be fully zero emission at the tailpipe from 2035. If these ambitions are realised then road traffic-related NOx emissions can be expected to reduce significantly over the coming decades, likely beyond the scale of reductions forecast in the tools utilised in carrying out this air quality assessment.

Environment Act 2021

2.10 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.

2.11 Under the Act, the Government has recently published two new targets for future concentrations of $PM_{2.5}$. These are described in Paragraph 3.5.

Planning Policy

National Policies

2.12 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".

2.13 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".

2.14 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".

2.15 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".

2.16 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".

2.17 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".

2.18 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 *"Odour and dust can also be a planning concern, for example, because of the effect on local amenity"*.

2.19 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".

2.20 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".

2.21 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

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

The London Plan

2.23 The London Plan (GLA, 2021) 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".

2.24 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".

2.25 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."

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

2.27 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".

2.28 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".

2.29 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].

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

[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 2.31).

London Environment Strategy

2.31 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

2.32 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

2.33 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

2.34 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) guidance (IAQM, 2016), and it states that "*the latest version of the IAQM Guidance should be used*".

Air Quality Focus Areas

2.35 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 King's Cross/ Caledonian Road air quality Focus Area.

Local Transport Plan

2.36 LB of Camden's Transport Strategy (LB of Camden, 2019) sets out the Council's vision and objectives for transport in the borough, in order to respond to changing challenges, opportunities and policy contexts, and identifies measures by which the Council will meet its transport goals. The Strategy contains one relevant objective, to air quality; Objective 5 '*To reduce and mitigate the impact of transport-based emissions…*'. The Objective is supported by the following policies:

"*Policy 5b: Work towards the World Health Organisation (WHO) limits for Particulate Matter and Nitrogen Dioxide by 2030.*

Policy 5c: Use air quality indicators (PM_{10} and NOx emissions levels) as key factors in prioritising locations for LIP-funding through our Area-wide Healthy Streets Projects.

Policy 5h: Where feasible and appropriate, we will monitor the impact of our highways/streetscape schemes using air quality monitoring, including (for example) the use of diffusion tubes to monitor Nitrogen Dioxide levels pre- and post-implementation."

2.37 Other actions within the supporting policies include:

- Continuing to develop a comprehensive network of electric vehicle charging points;
- Incentivising the update of electric vehicles; and
- Establishing the highest standards for the Council's own vehicle fleet.

Local Policies

2.38 The Camden Local Plan 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).

2.39 Policy A1 on managing the impact of development states that "*The Council will seek to protect the quality of life of occupiers and neighbours*" and will "*seek to ensure that the amenity of communities, occupiers and neighbours is protected […] and require mitigation measures where necessary. Factors that will be considered include odour, fumes and dust"*.

2.40 Policy CC4 on Air Quality 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. Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emission impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan."

2.41 Policy D1 Design, has implications to air quality as well:

"*The Council will seek to secure high quality design in development. The Council will require that development […]*

c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;

h. promotes health;

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions…"

2.42 The plan elaborates that design can impact on air quality and health:

"*The way an area is designed and managed can have a significant impact on people's quality of life, health and wellbeing. Planning has a key role in promoting good physical and mental health by creating streets, spaces and buildings which allow and encourage healthy lifestyles. Architecture and urban design can affect human health through […] air quality [...]. The Council will require applicants to consider how development will contribute to improving health*."

2.43 To support the Camden Local Plan, the Council has published a 'Camden Planning Guidance (CPG)' document, specifically pertaining to air quality, which forms a Supplementary Planning Document (SPD). The CPG states that:

- "*All developments are to protect future occupants from exposure to poor air quality; and*
- *All developments are to limit their impact on local air quality and be at least air quality neutral*."

2.44 The CPG references the WHO guideline targets for NO_2, PM_{10} and $PM_{2.5}$ of 40 µg/m^3, 20 µg/m^3 and 10 µg/m^3 respectively which Camden aims to achieve by 2030. The SPD also states that "*For the determination of planning applications and appraisal of Construction Management Plans, consideration must be paid to uncertainty in NO_2 data, therefore 38µg/m^3 (the 40µg/m^3 WHO limit less 5%) shall be taken as the limit for this pollutant*".

2.45 The SPD outlines when an air quality assessment should be undertaken and what the assessment should cover. With respect to dispersion modelling, the SPD states that "*Modelling should not predict improvements to future years (future vehicle emissions or future background concentrations)*."

Building Standards

2.46 Part F(1) of Schedule 1 of the Building Regulations 2010 as amended June 2022 (Ministry of Housing, Communities & Local Government, 2022) places a duty on building owners, or those responsible for relevant building work[2], to ensure adequate ventilation is provided to building occupants.

2.47 Approved Document F (HM Government, 2021), 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 3.6, 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.

2.48 Part S(1) of Schedule 1, and Regulation 44D, of the Building Regulations 2010 (Ministry of Housing, Communities & Local Government, 2022) define a requirement for the provision of infrastructure for charging electric vehicles. Precise requirements are explained further within Approved Document S (HM Government, 2021b) and depend on the overall number of parking spaces provided and the average financial cost of installation.

2.49 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.

Air Quality Action Plans

National Air Quality Plan

2.50 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, 2018) 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

[2] 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 the modelling undertaken for 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

2.51 LB of Camden's combined Clean Air Strategy and Clean Air Action Plan sets out the strategic objectives for improving air quality in the borough between 2019 and 2034 and the actions that will be undertaken between 2023 and 2026 to support the strategic objectives.

2.52 One of the Clean Air Strategy's key commitments is "*achieving the most stringent evidence-based air quality targets available, in as short a timeframe as possible. Currently, these are the World Health Organization's (WHO) air quality guidelines, published in 2021*" of 10µg/m^3 for NO_2 by 2034, 15µg/m^3 for PM_{10} by 2030 and 5µg/m^3 for $PM_{2.5}$ by 2034. These are more stringent than those published in the Air Quality CPG, which are based on the previous WHO guidelines but are recommended for use "*for the determination of planning applications and appraisal of Construction Management Plans*" (LB of Camden, 2021).

2.53 The Clean Air Action Plan contains 36 'Clean Air Outcomes' to help improve air quality and protect health in Camden. The Plan sets out seven themes, around which a number of actions have been developed in order to improve local air quality:

- reducing construction emissions;
- reducing building emissions;
- reducing transport emissions;
- supporting communities and schools;
- indirect emissions and lobbying;
- public health and awareness; and,
- indoor air quality and occupational exposure.

3 Assessment Criteria

UK 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 NO_2 and PM_{10} were to have been achieved by 2005 and 2004 respectively, and continue to apply in all future years thereafter. 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). Therefore, 1-hour nitrogen dioxide concentrations will only be considered if the annual mean concentration is above this level. 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). The predicted annual mean PM_{10} concentrations are thus used as a proxy to determine the likelihood of an exceedance of the 24-hour mean PM_{10} objective. Where predicted annual mean concentrations are below 32 µg/m^3 it is unlikely that the 24-hour mean objective will be exceeded.

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 NO_2 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. Meanwhile, the annual mean objectives do not apply at the "*building facades of offices or other places of work where members of the public do not have regular access*" or "*Hotels, unless people live there as their permanent residence*". 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 NO_2 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 Defra has also set objectives and targets for concentrations of $PM_{2.5}$. The objective for $PM_{2.5}$ is not set in regulations and there is no requirement for local authorities to meet it. Because this objective is not set in regulations, it is not formally defined. It was originally set as an annual mean concentration of 25 µg/m^3 but, following changes to the limit value for $PM_{2.5}$ (see Paragraph 3.6) through the EU Exit Regulations 2020, a value of 20 µg/m^3 is now commonly used.

3.5 Defra has also recently published two new targets for $PM_{2.5}$ concentrations in England. One target is to achieve $PM_{2.5}$ concentration of 10 µg/m^3 by 2040. This is accompanied by a second target to reduce overall population exposure to $PM_{2.5}$, which will be assessed by national government using its own measurements. Defra recognises that the nature of $PM_{2.5}$ concentrations, which are dominated by long-range emissions, mean that only coordinated national-level action can allow it to achieve these targets by 2040. Furthermore, the difficulty of predicting $PM_{2.5}$ concentrations in 2040 (AQEG, 2021) usually prevents any meaningful individual local-scale assessment. As such, the targets provide metrics against which central Government can assess its own progress. Defra has not set the targets in expectation that individual local authorities will use them to assess compliance, or that they will be used explicitly within development-control decisions. Defra's focus for local authorities is on reducing emissions which will help to drive national-level improvements, rather than addressing $PM_{2.5}$ concentrations in their own area. Similarly, in terms of planning decisions, it is most sensible to focus on optimising development to reduce emissions and exposure.

3.6 EU Directive 2008/50/EC (The European Parliament and the Council of the European Union, 2008) sets limit values for NO_2, PM_{10} and $PM_{2.5}$, and is implemented in UK law through the Air Quality Standards Regulations (2010)[3]. The limit values for NO_2, PM_{10} and $PM_{2.5}$ are the same numerical concentrations as the UK objectives, but 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 limit values being exceeded, unless such studies have been audited and approved by Defra and DfT's Joint Air Quality Unit (JAQU).

3.7 The relevant air quality objectives are provided in Table 1.

Table 1: Air Quality Objectives for NO_2, PM_{10} and $PM_{2.5}$

Pollutant	Time Period	Objective
NO_2	1-hour Mean	200 µg/m^3 not to be exceeded more than 18 times a year
	Annual Mean	40 µg/m^3
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]
$PM_{2.5}$ [b]	Annual Mean	20 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, 2022e).

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

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

GLA $PM_{2.5}$ Target

3.8 As explained in Paragraph 2.31, 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.

Camden Criteria

3.9 The LB of Camden has committed within their Air Quality CPG and AQAP to meeting the WHO guideline limits for NO_2, PM_{10} and $PM_{2.5}$, as discussed in paragraphs 2.44 and 2.52. However, the two documents quote different WHO limits; the CPG refers to the previous WHO limits to be met in 2030 while the AQAP refers to the current WHO limits to be met in 2034.

3.10 The commitment to meet the new WHO guidelines in the AQAP is described within the context of the Council's local air quality management; the AQAP states that "*We will not consider that we have achieved the WHO guideline objectives until every monitoring location at which the pollutants are measured records annual mean concentrations which meet the relevant standards*". The purpose of the AQAP is to help fulfil their requirements under the LAQM regime, rather than development control. The AQAP does not reference the WHO guidelines for planning, nor does the AQAP include any measures with respect to updating the Air Quality CPG to account for the latest WHO guidelines.

3.11 Meanwhile, the WHO guidelines outlined in the Air Quality CPG are provided within the context of undertaking an air quality assessment for planning, stating that the WHO guidelines quoted in the CPG are to be used for "*the determination of planning applications and appraisal of Construction Management Plans*". The WHO guidelines in the Air Quality CPG also align with those in the London Environment Strategy (GLA, 2018a).

3.12 The WHO guidelines outlined within the Air Quality CPG, which specifically relates to planning, are presented in Table 2 below, and have been considered within this assessment.

Table 2: Camden Air Quality CPG Criteria for NO_2, PM_{10} and $PM_{2.5}$ in the

Pollutant	Guideline target (as an annual mean)
NO_2	38 µg/m^3 [a]
PM_{10}	20 µg/m^3
$PM_{2.5}$	10 µg/m^3

[a] While the WHO guideline is 40 µg/m^3, 38 µg/m^3 has been used in accordance with the Air Quality CPG which states that "consideration must be paid to uncertainty in NO_2 data, therefore 38µg/m^3 (the 40µg/m^3 WHO limit less 5%) shall be taken as the limit for this pollutant."

Construction Dust Criteria

3.13 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)[4] (2016) has been used (the GLA's SPG (GLA, 2014b) recommends that the assessment be based on the latest version of the IAQM guidance). Full details of this approach are provided in Appendix A2.

Screening Criteria

Road Traffic Assessments

3.14 Environmental Protection UK (EPUK) and the 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 A3, 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.

3.15 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 A3) inside an AQMA are a change in flows of more than 25 heavy duty vehicles or 100 light duty vehicles per day. 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"*.

Emergency Generator Assessment

4 The Proposed Development will include two emergency backup diesel generators. The potential for exceedances of the air quality objectives from the proposed generators have been considered. This

[4] The IAQM is the professional body for air quality practitioners in the UK.

approach requires professional judgement, and the experience of the consultants preparing the assessment is set out in Appendix A4.

5 Assessment Approach

Consultation

5.1 The assessment follows a methodology which was presented to the LB of Camden via email correspondence between Tom Parkes (Air Quality Programme Manager Officer at LB of Camden) and Julia Burnell (Air Quality Consultants) in January 2023. Specifically, the following key points were presented and agreed in principle (although it was not possible to obtain formal approval of the methodology):

- dispersion modelling will be updated using the latest traffic data, monitoring data and background pollutant concentrations;
- modelling will be undertaken for the base year of 2022 and anticipated year of completion of 2025. In accordance with the Air Quality CPG, concentrations will also be predicted assuming no improvements in emissions or background concentrations between the baseline and the opening year;
- the air quality neutral assessment and construction dust risk assessment will be updated;
- the assessment of emissions from emergency diesel generators will be updated (which were previously assessed qualitatively). As much detail as possible should be included on the generators, including specifications and proposed testing regime;
- the impacts associated with the relocation of the laboratory flues is being assessed separately by RWDI and therefore the report will summarise the findings of their assessment; and,
- the assessment should consider any commercial cooking premises that form part of the hotel or office component of the site.

Study Area

5.2 The study area for the assessment has been identified using professional judgement. It includes the application site itself and roads in the surrounding area which are expected to impact on air quality at the Site. Specifically, the assessment has focussed on Swinton Street (A201), Acton Street (A501), Argyle Street and Argyle Square, as well as Gray's Inn Road (A5200), from York Way to Heathcote Street, and King's Cross Road (A201), from Pentonville Road to Wharton Street. The study area is shown in Figure 2.

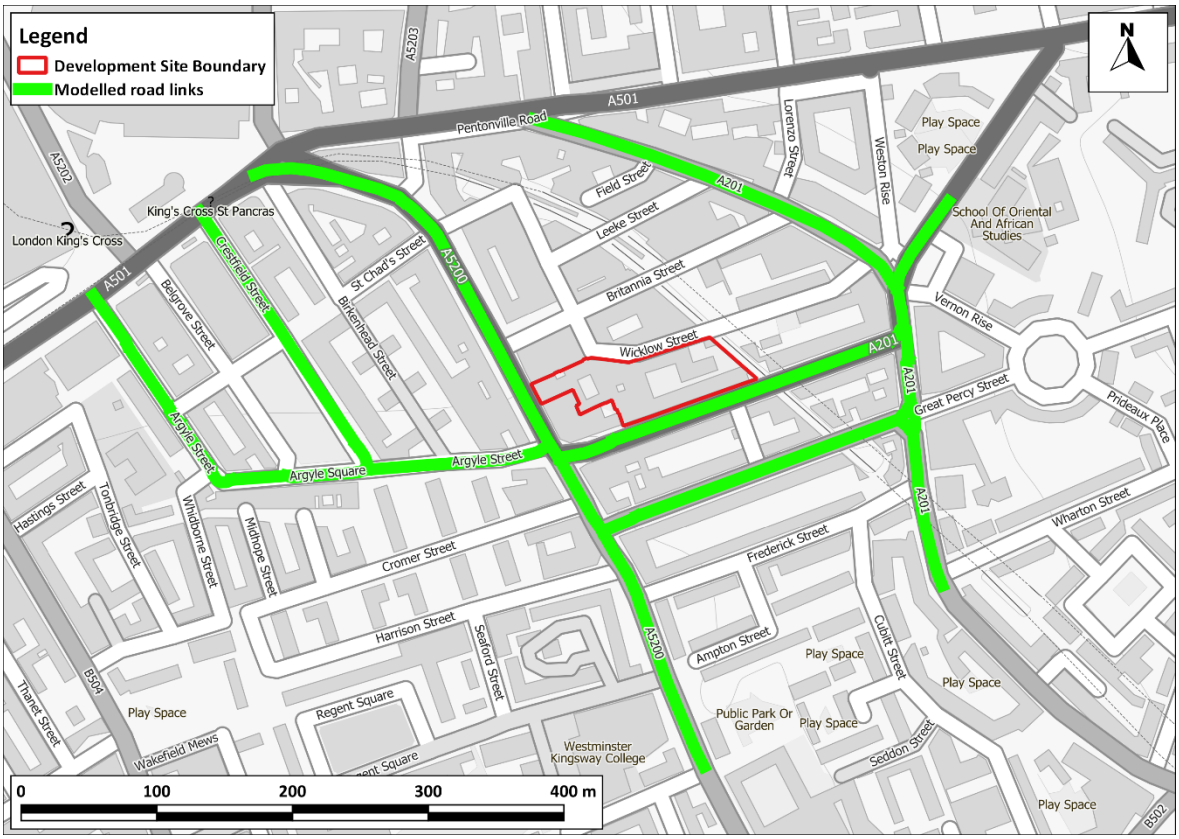

Figure 2: Study Area

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5.3 Wicklow Street has not been included within the model network, as there are no traffic data available. Nonetheless, Wicklow Street is one-way only and will be used predominantly as access to residential properties and office buildings, adjacent to the Site. It is, therefore, reasonable to assume that traffic flows will be low. Where any predicted concentrations at the Site are close to the objectives, the omission of emissions from vehicles using this road has been taken into account and considered further where considering the significance of any impacts.

Receptors

5.4 Concentrations of NO_2, PM_{10} and $PM_{2.5}$ have been predicted at a number of locations within the proposed development, focusing on the residential and hotel uses as these receptors are relevant exposure to the air quality objectives. Receptors have been identified to represent a range of exposure, including worst-case locations (these being at the façades of the buildings fronting Swinton Street and Gray's Inn Road). Whilst not locations of relevant exposure to the air quality objectives, as described in paragraph 3.3, results have also been presented for the office uses, to address comments provided by LB of Camden on the 2020 assessment, which requested their consideration.

5.5 These locations are described in Table 3 and shown in Figure 3. Receptors were modelled at each floor level and are summarised in Table 4. Results have been verified against data from site specific monitoring locations.

Table 3: Description of Receptor Locations

Receptor	Type	X coordinate	Y coordinate
1	Residential – South, Swinton Street	530634	182801
2	Residential – South, Swinton Street	530645	182806
3	Residential – South, Swinton Street	530656	182810
4	Residential – South, Swinton Street	530669	182815
5	Residential – South, Swinton Street	530681	182817
6	Residential - South	530677	182821
7	Residential – South, Courtyard	530672	182825
8	Residential – South, Courtyard	530666	182823
9	Residential – South, Courtyard	530652	182818
10	Residential – South, Courtyard	530642	182815
11	Residential – South, Courtyard	530630	182811
12	Residential – North, Wicklow Street	530648	182847
13	Residential – North, Wicklow Street	530635	182843
14	Residential – North, Wicklow Street	530620	182839
15	Hotel – Reception Lobby and Cafe	530530	182801
16	Hotel – Reception Lobby and Cafe	530526	182808
17	Hotel – Reception Lobby and Cafe	530523	182814
18	Hotel - Rooms	530526	182815
19	Hotel - Rooms	530529	182809
20	Hotel - Rooms	530532	182803
21	Office	530613	182793
22	Office	530590	182785

Table 4: Modelled Receptor Heights (m)

Floor	Residential – South (1-11)	Residential – North (12-14)	Hotel – Entrance (15-17) [a]	Hotel – Rooms (18-20)	Office (21-22)
Basement	0.1	-	-	-	-
Ground	1.5	1.5	1.5	1.5	1.5
1st	4.7	4.8	-	5.5	5.3
2nd	7.9	8.2	-	8.5	9.1
3rd	11.2	11.5	-	11.5	12.9
4th	14.4	14.8	-	-	16.7
5th	17.6	18.2	-	-	20.5
6th	-	21.5	-	-	24.3
7th	-	24.8	-	-	-
8th	-	28.1	-	-	-
9th	-	31.5	-	-	-
10th	-	34.8	-	-	-
11th	-	38.1	-	-	-
12th	-	41.5	-	-	-

[a] The ground floor hotel façade at this location is closer to the road than the floors above. Therefore, there is no relevant exposure at higher levels.

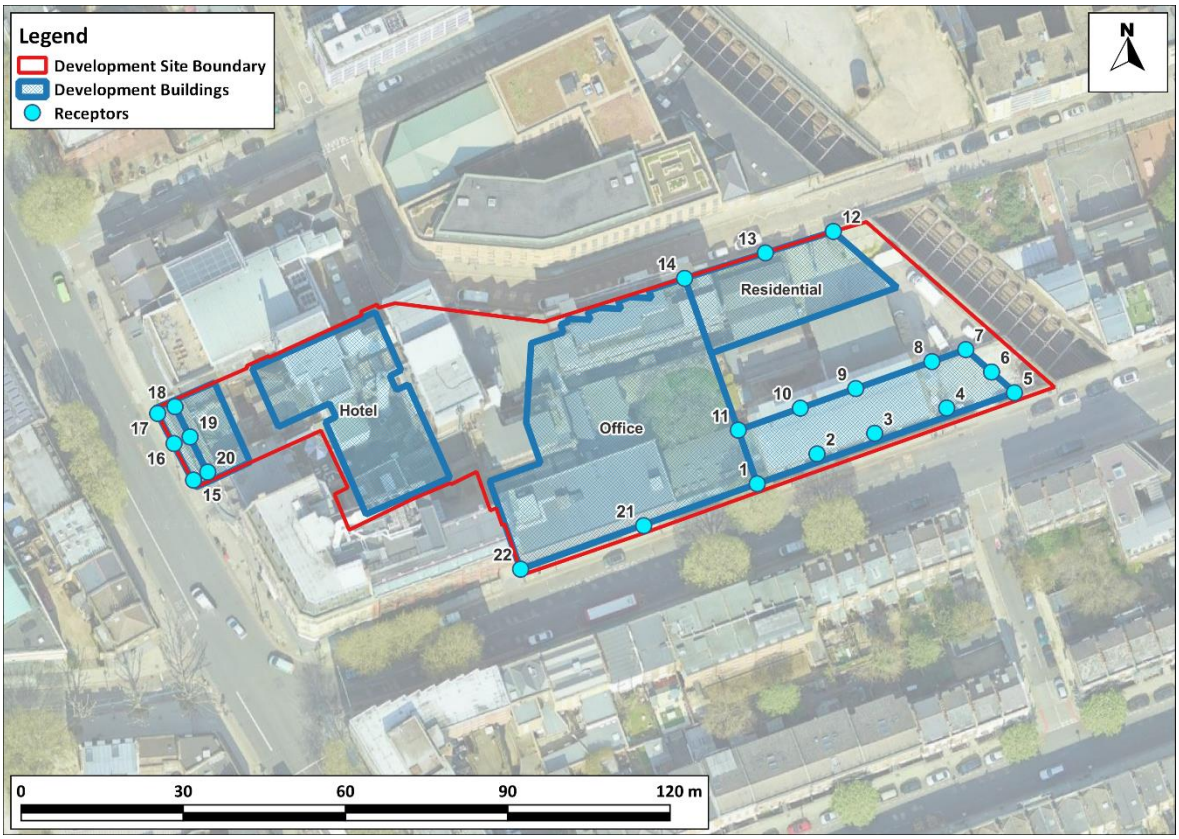

Figure 3: Receptor Locations

Imagery ©2023 Bluesky, CNES/Airbus, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group. Map data © 2023 Google

5.6 Selected receptors may be representative of air quality conditions at a number of properties; consideration has been given to how many sensitive locations each modelled receptor represents when considering the impacts of the proposed development and the overall significance of effects.

5.7 As discussed in Paragraphs 3.3 through 3.5, residential land-uses are most sensitive, as these represent relevant exposure for the annual mean objectives. The hotel users represent relevant exposure for the 24-hour and 1-hour mean objectives. The office uses do not represent relevant exposure to any of the national air quality objectives (but are protected by occupation exposure limits for common pollutants) and are therefore not sensitive, however they have been presented in the report for reference. In addition to the Camden CPG criteria, predicted concentrations for the residential properties are compared to the NO_2 and PM_{10} annual mean objectives of 40 µg/m^3, and for consideration of the short-term objectives, an annual mean NO_2 concentration of 60 µg/m^3 (the proxy value identified in air quality guidance to indicate a potential exceedance of the 1-hour mean objective) and annual mean PM_{10} concentration of 32 ug/m^3 (the proxy value identified in air quality guidance to indicate a potential exceedance of the 1-hour mean objective). At the hotel façade only the proxy values for consideration of the short-term objectives are relevant.

5.8 The construction dust risk assessment approach does not require specific receptors to be identified; instead, the numbers of different types of receptors within given distance bands are counted. These receptor counts are provided in Section 7.

Existing Conditions

5.9 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 conducting a site specific air quality survey, detailed in Section 6. The results of monitoring carried out by the local authority have also been included in order to provide context for the assessment;
- background NO_2 concentrations have been defined using site specific monitoring results (GR6) from the top floor of the existing Royal National Throat, Nose and Ear Hospital building, fronting Wicklow Street[5]. In addition, Defra's 2018-based background maps (Defra, 2022d) have been used to derive future NO_2 background concentrations and background PM_{10} and $PM_{2.5}$ concentrations. These cover the whole of the UK on a 1x1 km grid; The future background annual mean NO_2 background maps for 2025 have been calibrated against local measurements made at the GR6 monitoring site from the site-specific monitoring survey GR5. The NO_2 concentration at this site for 2022 was 26.0 $\mu g/m^3$, while the mapped background for the grid square within which it lies was 35.5 $\mu g/m^3$. All future mapped background NO_2 concentrations have therefore been calibrated by applying a factor of 0.73. Mapped background concentrations of PM_{10} and $PM_{2.5}$ have not been adjusted due to poor data capture for 2022 at the London Bloomsbury automatic monitor; and
- whether or not there are any exceedances of the annual mean limit value for NO_2 in the study area has been identified using the maps of roadside concentrations published by Defra (2020) (2023b), as well as from any nearby Automatic Urban and Rural Network (AURN) monitoring sites (which operate to the required data quality standards). These are the maps used by the Government, together with the AURN results, to identify and report exceedances of the limit value. The national maps of roadside PM_{10} and $PM_{2.5}$

[5] This monitor was used rather than the London Bloomsbury automatic monitor as it is considered more representative of conditions at the proposed development. Furthermore, the concentration at GR6 is greater than at the London Bloomsbury automatic monitoring site and therefore is worst case.

concentrations (Defra, 2023b), which are available for the years 2009 to 2019, show no exceedances of the limit values anywhere in the UK in 2019.

Construction Impacts

5.10 The construction dust assessment considers the potential for impacts within 350 m of the site boundary, or within 50 m of roads used by construction vehicles. The assessment methodology follows the GLA's SPG on the Control of Dust and Emissions During Construction and Demolition (GLA, 2014b), which is based on that provided by IAQM (2016). This follows a sequence of steps:

- Step 1 is a basic screening stage, to determine whether the more detailed assessment provided in Step 2 is required.
- Step 2a determines the potential for dust to be raised from on-site works and by vehicles leaving the site. Step 2b defines the sensitivity of the area to any dust that may be raised. Step 2c combines the information from Steps 2a and 2b to determine the risk of dust impacts without appropriate mitigation.
- Step 3 uses this information to determine the appropriate level of mitigation required to ensure that there should be no significant impacts.

5.11 Appendix A2 explains the approach in more detail.

Impacts of the Proposed Backup-Generator Plants

5.12 The proposed development will be provided with emergency electricity using a two 2.25 MVA backup diesel generator to be located on the roof of the office building. The impacts of emissions from the generators have been qualitatively assessed with reference to flue locations, testing regime, generator size, emissions parameters and baseline air quality to determine the potential for significant effects.

Impacts of the Relocated Laboratory Flues

5.13 The proposed development will include the relocation of the laboratory flues from the neighbouring UCL Ear Institute building. These laboratory flues release a range of gases which have the potential to cause impacts to nearby receptors if the flues are not situated in a location and height which allows sufficient dilution of these chemicals from the exhaust. A fume dispersion assessment has therefore been undertaken by RWDI to assess the impact of different locations of the flue on dispersion and the resultant risk at nearby receptors.

5.14 Several options with regards to potential locations and/or configurations of these flues were evaluated via wind tunnel testing. Dispersion from the modelled extract flues were measured at receptor locations representing air intakes, and openable windows on the new development (primarily the Hotel), the existing UCL Laboratory Building, and other nearby existing buildings.

5.15 The findings of this assessment conducted by RWDI have been summarised within this report.

Impacts from Road Traffic

Impacts of Proposed Development on Existing Receptors

5.16 The first step in considering the road traffic impacts of the proposed development has been to screen the development and its traffic generation against the criteria set out in the EPUK/IAQM guidance (Moorcroft and Barrowcliffe et al, 2017), as described in Paragraph 3.14 and detailed further in Appendix A3. Where impacts can be screened out there is no need to progress to a more detailed assessment.

Impacts of Existing Air Quality on Future Residents

5.17 Future occupants of the proposed development itself will be subject to the impacts of emissions associated with road traffic on local roads emissions from the proposed diesel generator, and emissions from the laboratory flues. The main air pollutants of concern related to traffic emissions and the diesel generator are NO_2, PM_{10} and $PM_{2.5}$.

5.18 The impacts of concentrations of NO_2 and particulate matter on future users of the proposed development have been assessed using detailed dispersion modelling.

Modelling Methodology

5.19 Concentrations have been predicted using the ADMS-Roads dispersion model, with vehicle emissions derived using Defra's Emission Factor Toolkit (EFT) (v11.0) (Defra, 2022d). Details of the model inputs and the model verification are provided in Appendix A5.

Assessment Scenarios

5.20 Nitrogen dioxide, PM_{10} and $PM_{2.5}$ concentrations have been predicted for the proposed year of opening of the proposed development (2025).

5.21 In accordance with LB of Camden's Air Quality planning guidance (LB of Camden, 2021), concentrations have also been predicted for the proposed opening year assuming no improvements in emissions from the baseline scenario (i.e. using 2022 emission factors and background concentrations with 2025 traffic data). As discussed in paragraphs 5.24 to 5.27 below, this is a highly conservative assumption.

Uncertainty

5.22 There are many components that contribute to the uncertainty of modelling predictions. The road traffic emissions dispersion model used in this assessment is dependent upon the traffic data that have been input, which will have inherent uncertainties associated with them. There are then

additional uncertainties, as models are required to simplify real-world conditions into a series of algorithms.

5.23 An important stage in the process is model verification, which involves comparing the model output with measured concentrations (see Appendix A5). Because the model has been verified and adjusted, there can be reasonable confidence in the prediction of base year (2022) concentrations.

5.24 Predicting pollutant concentrations in a future year will always be subject to greater uncertainty. For obvious reasons, the model cannot be verified in the future, and it is necessary to rely on a series of projections provided by DfT and Defra as to what will happen to traffic volumes, background pollutant concentrations and vehicle emissions. Historic versions of Defra's EFT tended to over-state emissions reductions into the future. However, analyses of the most recent versions of Defra's EFT carried out by AQC (2020b) (2020c) suggest that, on balance, these versions are unlikely to over-state the rate at which NOx emissions decline in the future at an 'average' site in the UK. In practice, the balance of evidence suggests that NOx concentrations are most likely to decline more quickly in the future, on average, than predicted by the current EFT, especially against a base year of 2016 or later. Using EFT v11.0 for future-year forecasts in this report thus provides a robust assessment, given that the model has been verified against measurements made in 2022.

5.25 In spite of the large body of evidence described above indicating that the EFT vehicle projection factors are robust and LB of Camden monitoring data indicating the concentrations have continually reduced in the borough since 2015 (presented in Table 5 and Table 7), the Air Quality CPG requests that concentrations are predicted assuming no improvements in vehicle emissions. For these reasons, the results from this scenario are considered highly conservative; the background concentrations, baseline concentrations, and impacts of the proposed development, are actually expected to be closer to those described in Sections 6 and 8 of this report. Appendix A6.1 discusses uncertainties regarding the future fleet mix in London and the scale of the reduction in NOx emissions that can be expected with the adoption of these changes. The LB of Camden approach of ignoring future improvements in air quality will more than offset any other uncertainties in the assumptions.

5.26 Forecasts of future-year concentrations are usually based on measurements made during a recent year. They then take account of projected changes over time to factors such as the composition of the vehicle fleet and the uptake of other new technologies, as well as population increases etc.. In early 2020, activity in the UK was disrupted by the Covid-19 pandemic. As a result, concentrations of traffic-related air pollutants fell appreciably (Defra Air Quality Expert Group, 2020). While the pandemic may cause long-lasting changes to travel activity patterns, it is reasonable that 2022 represents a return to more typical activity levels. 2020 and 2021 is likely to present as an atypically low pollution year for roadside pollutant concentrations.

5.27 Changes were made to the LEZ and the Ultra Low Emission Zone (ULEZ) in 2021. The changes are described in detail in Appendix A1, and can be expected to significantly reduce NOx emissions in London; however, they are not reflected in Defra's latest EFT and thus have not been considered

in this assessment. The assessment presented in the main body of this report is, therefore, a worst-case in this regard, and it is expected that background concentrations, baseline concentrations, and the impacts of the proposed development, will be lower than described in Sections 6 and 8 of this report (and even lower than those presented in Appendix A6 where it is assumed there is no improvement in air quality from pre-LEZ and ULEZ). Appendix A6.1 discusses uncertainties regarding the future fleet mix in London and the scale of the reduction in NOx emissions that can be expected with the adoption of these changes.

5.28 This assessment has also considered the GLA target for $PM_{2.5}$ and the WHO guideline limit values as outlined in the Air Quality CPG.

Assumptions

5.29 It is necessary to make a number of assumptions when carrying out an air quality assessment; in order to account for some of the uncertainty in the approach, as described above, assumptions made have generally sought to reflect a realistic worst-case scenario. Key assumptions made in carrying out this assessment include that the London City meteorological monitoring station appropriately represents conditions in the study area (this is discussed further in Appendix A5) and that the proposed development is located within street canyons (this is discussed further in Appendix A5). The 2022 no reduction in emissions scenario is based on 2025 traffic data and 2022 emissions.

Assessment of Significance

Construction Dust Significance

5.30 Guidance from IAQM (2016) is that, with appropriate mitigation in place, the effects of construction dust will be 'not significant'. This is the latest version of the guidance upon which the assessment methodology set out in the GLA guidance (GLA, 2014b) is based (the GLA guidance advises that the latest version of the IAQM guidance should always be used). The assessment thus focuses on determining the appropriate level of mitigation so as to ensure that effects will normally be 'not significant'.

Operational Significance

5.31 There is no official guidance in the UK in relation to development control on how to assess the significance of air quality impacts. The approach developed jointly by EPUK and the IAQM (Moorcroft and Barrowcliffe et al, 2017) has therefore been used. The overall significance of the air quality impacts is determined using professional judgement; the experience of the consultants preparing the report is set out in Appendix A4. Full details of the EPUK/IAQM approach are provided in Appendix A3.

‘Air Quality Neutral’

5.32 The GLA’s London Plan Guidance (Air Quality Neutral) (GLA, 2021) sets out guidance on how an ‘air quality neutral’ assessment should be undertaken. It also provides a methodology for calculating an offsetting payment if a development is not ‘air quality neutral’ and it is not possible to identify or agree appropriate and adequate mitigation. The document is currently in consultation draft.

5.33 Appendix A8 sets out the emissions benchmarks proposed in the consultation draft of the guidance. The approach has been to calculate the emissions from the development and to compare them with these benchmarks.

6 Baseline Conditions

Relevant Features

6.1 The Site is located near St Pancras, in Camden, within 150 m of the boundary with London Borough of Islington (LB of Islington). The Hotel buildings within the application site are bounded by Gray's Inn Road and other buildings surrounding the Site. Both residential buildings are bounded in part by a trainline running between St Pancras and Farringdon Station, one of the buildings by Swinton Street and the other by Wicklow Street. The office building is bounded by Wicklow Street, Swinton Street and adjacent buildings. The Site currently consists of The Royal National Throat, Nose and Ear Hospital. There are existing residential, office and retail buildings in the immediate surroundings.

6.2 The Site is located within the Camden boroughwide AQMA and the King's Cross/Caledonian Road air quality Focus Area, as highlighted in Figure 1.

Industrial Sources

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

Site Visit

6.4 A site visit was carried out on 3rd July 2019, to commence the site-specific monitoring. Other than road traffic, no significant sources of air pollution were identified during the site visit. A review of satellite imagery of the area indicates there have been no major changes in the area since the 2019 site visit.

Local Air Quality Monitoring

Local Authority Monitoring

6.5 LB of Camden operates three automatic monitoring stations within its area, the closest of which are the London Bloomsbury and Euston Road sites, situated 650 and 880 m away respectively. The Council also operates a number of NO_2 monitoring sites using diffusion tubes prepared and analysed by Gradko International (using the 50% TEA in acetone method). These include two deployed along Euston Road, within 650 m of the Site, and a number at background sites.

6.6 The Site also lies in close proximity to the LB of Islington. LB of Islington operates three diffusion tube monitoring sites within 700 m of the Site, including two background locations and the Roseberry Avenue roadside site.

6.7 Annual mean results for the years 2015 to 2022[6] are summarised in Table 5, while results relating to the 1-hour mean objective are summarised in Table 6 (data for 2022 is only available for the automatic monitoring sites). The monitoring locations are shown in Figure 4. The monitoring data have been taken from LB of Camden's 2022 Annual Status Report (LB of Camden, 2022), LB of Islington's 2022 Annual Status Report (LB of Islington, 2022) and the Air Quality England website (Air Quality England, 2023).

Table 5: Summary of Annual Mean NO_2 Monitoring (2015-2022) (µg/m^3)[a]

Site No.	Site Type	Location	2015	2016	2017	2018	2019	2020	2021	2022
LB of Camden – Automatic Sites										
BL0	Urban Background	London Bloomsbury	**48**	**42**	38	36	32	28	27	24
CD9	Roadside	Euston Road	**90**	**88**	**83**	**82**	**70**	**43**	**48**	**44**
LB of Camden – Diffusion Tubes										
CA10	Urban Background	Tavistock Gardens	**45**	**40**	**46**	35	34	27	22[b]	-
CA27	Roadside	Euston Road LAQN colocation	-	-	-	-	**65**	**47**	**47**[b]	**-**
CA28	Urban Background	St. George's Gardens East	-	-	-	-	28	22	17	-
CA29	Roadside	Endsleigh Gardens	-	-	-	-	**49**	35	35[b]	-
CA4A (new)	Kerbside	Euston Road	-	-	-	-	**71**	**54**	**57**[b]	**-**
CA6	Urban Background	St. George's Gardens (prev. 'Wakefield Gardens')	36	31	34	27	25	-[c]	-[c]	-[c]
LB of Islington – Diffusion Tubes										
BIS005/02	Roadside	Roseberry Avenue	**62**	**62**	**54**	**51**	**44**	31	30	-
BIS005/04	Urban Background	Percy Circus	**45**	**46**	**40**	35	32	23	22	-
BIS005/05	Urban Background	Myddleton Square	39	38	39	35	28	21	20	-
Objective			**40**							

[a] Exceedances of the objectives are shown in bold.

[b] Data capture less than 75%.

[c] This monitor was retired in 2020

[6] 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

Table 6: Number of Hours With NO_2 Concentrations Above 200 µg/m^3 [a]

Site No.	Site Type	Location	2015	2016	2017	2018	2019	2020	2021	2022
BL0	Urban Background	London Bloomsbury	0	0	0	0	0	0	0	0
CD9	Roadside	Euston Road	**54**	**39**	**25**	18	7	0	1	2
Objective			**18**							

[a] Exceedances of the objectives are shown in bold.

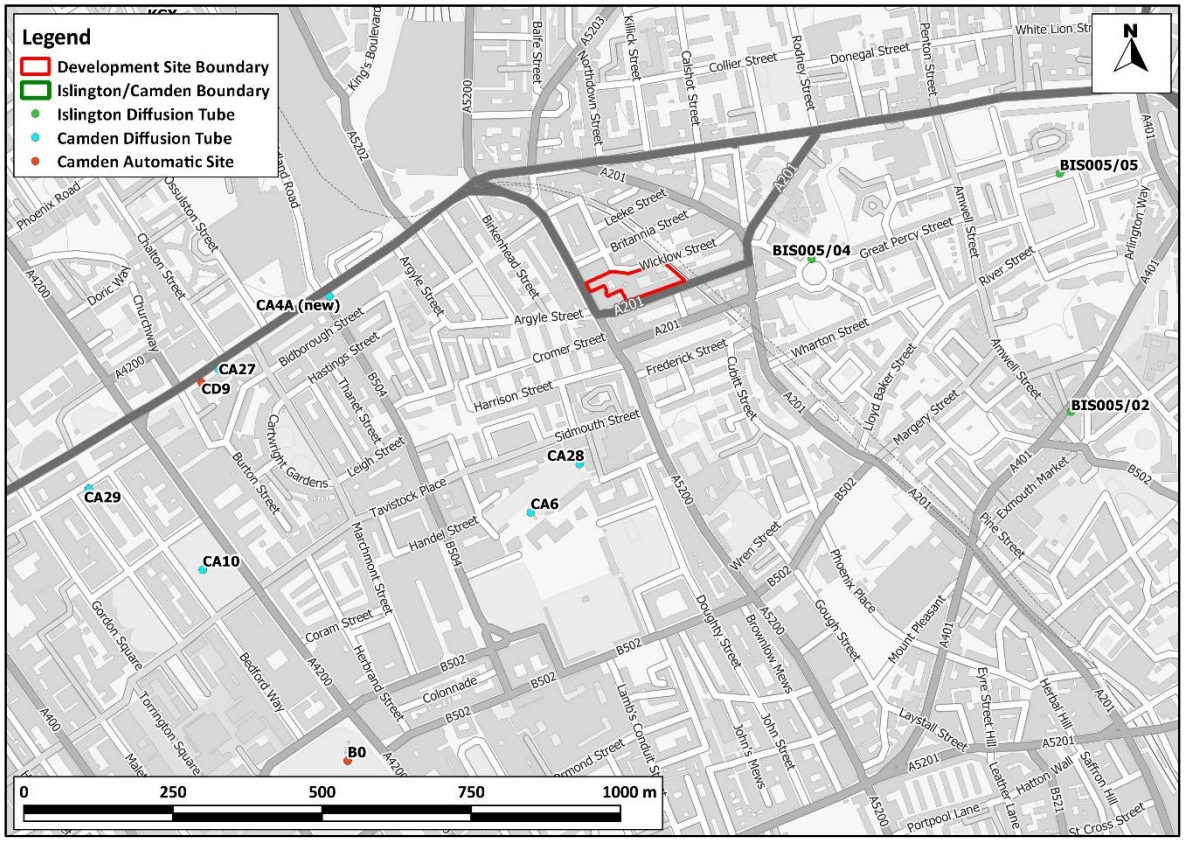

Figure 4: Local Authority Monitoring Locations

6.8 There have been consistent exceedances of the annual mean NO_2 objective, at roadside and kerbside monitors since 2015. However, concentrations at all background sites in the study area have been below the objective since 2018. No exceedances of the hourly NO_2 objective have been measured since 2015 at the urban background automatic monitor (BL0), while at the roadside automatic monitor (CD9), hourly NO_2 concentrations have been below the objective since 2019.

6.9 However, none of the above monitoring sites are considered representative of air quality conditions at the Site. Therefore, a site specific monitoring survey was conducted (see paragraph 5.12 through to 5.17).

6.10 From the monitoring sites that have been in operation since 2015, there is evidence to suggest a strong downward trend in concentrations over time at roadside and urban background monitoring sites, demonstrating a sustained improvement in air quality within the Borough in recent years.

6.11 The London Bloomsbury and Euston Road automatic monitoring stations also measure PM_{10} and $PM_{2.5}$. Annual mean results for the years 2015 to 2022 are summarised in Table 7, while results relating to the daily mean objective are summarised in Table 8. The results demonstrate that PM_{10} and $PM_{2.5}$ concentrations have been below the respective objectives since 2015. However, mean $PM_{2.5}$ concentrations were above the GLA target.

Table 7: Summary of Annual Mean PM_{10} and $PM_{2.5}$ Monitoring (2015-2022) (µg/m^3)

Site No.	Site Type	Location	2015	2016	2017	2018	2019	2020	2021	2022
PM_{10}										
B0	Urban Background	London Bloomsbury	22	20	19	17	18	16	16	17
CD9	Roadside	Euston Road	18	24	20	21	22	18	19	21
Objective			**40**							
$PM_{2.5}$										
BL0	Urban Background	London Bloomsbury	11	12	13	10	11	9	9[b]	8[b]
CD9	Roadside	Euston Road	17	17	14	15	14	10	9	11
Objective/GLA target			**20/10 [a]**							

[a] The 20 µg/m^3 $PM_{2.5}$ objective, which was 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.

[b] Data capture less than 75%

Table 8: Number of Days With PM_{10} Concentrations Above 50 µg/m^3

Site No.	Site Type	Location	2015	2016	2017	2018	2019	2020	2021	2022
BL0	Urban Background	London Bloomsbury	6	9	6	1	9	4	0	5
CD9	Roadside	Euston Road	5	10	3	2	8	2	2	6
Objective			**35**							

Site Specific Monitoring Survey

6.12 Nitrogen dioxide monitoring has also been carried out using diffusion tubes deployed at seven locations in the vicinity of the Site by Air Quality Consultants Ltd. The locations of the seven monitoring sites are described in Table 9 and shown in Figure 5.

6.13 The diffusion tube survey was designed in accordance with the Diffusion Tubes for Ambient NO_2 Monitoring Practical Guidance (AEA Energy & Environment, 2008) published on Defra's air quality website. Diffusion tubes were supplied and analysed by Gradko International Ltd (using the 50% TEA in acetone preparation method).

6.14 Six months of monitoring was carried out between 3rd July 2019 to 8th January 2020. In order for the short-term monitoring study to represent annual mean concentrations in the base year, the data have been annualised to a 2022 calendar year in accordance with the method outlined in guidance from Defra (Defra, 2022e).

6.15 The data have also been corrected for systematic diffusion tube bias using a Defra's national diffusion tube bias adjustment factor spreadsheet (Defra, 2023). Full details of the annualisation and bias adjustment procedures applied are presented in Appendix A9.

Table 9: Diffusion Tube Monitoring Locations and Annual Mean NO_2 Concentrations [a]

Site No.	Location	Annual Mean NO_2 ($\mu g/m^3$) [b]	%Data Capture [c]
GR1	1st floor office window on Gray's Inn Road	34.0	100
GR2 [d]	Lampost on Gray's Inn Road	38.0	83
GR4 [d]	1st floor office window on Swinton Street	36.1	83
GR5 [d]	Lamppost on Swinton Street	37.7	100
GR6 [d]	Roof of Building on Wicklow Street	26.0	100
GR7 [d]	Wicklow Street	25.1	83
Objective		**40.0**	

[a] Results for monitoring site GR3 have not been presented due to low data capture.

[b] Results have been annualised and bias adjusted (see Appendix A9).

[c] 100% data capture corresponds to 6 months of data.

[d] Triplicate diffusion tubes.

6.16 The results show that at both ground and 1st-floor locations, on Gray's Inn Road, Wicklow Street and Swinton Street, concentrations were below the air quality objectives in 2022.

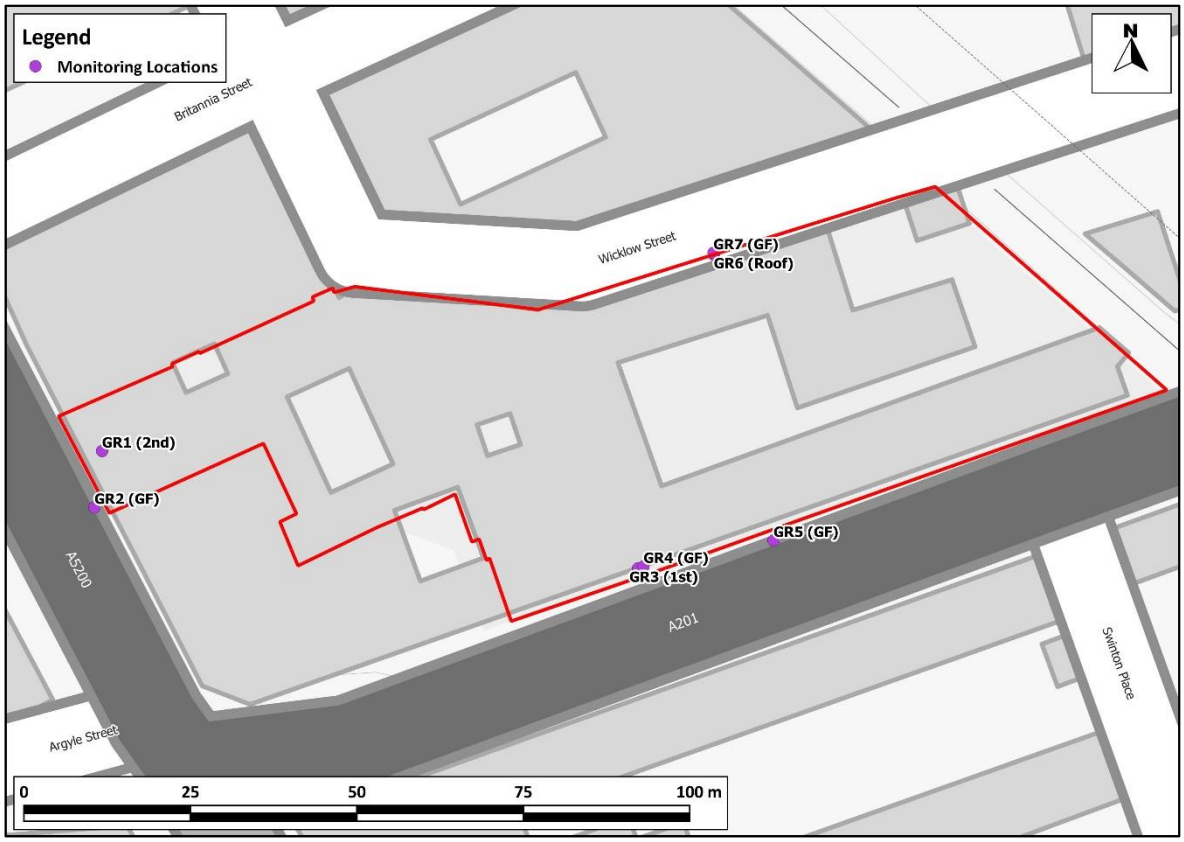

Figure 5: Site Specific Monitoring Survey Locations

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Exceedances of Limit Value

6.17 There are several AURN monitoring sites within the Greater London Urban Area that have measured exceedances of the annual mean NO_2 limit value (Defra, 2023c). Furthermore, Defra's roadside annual mean NO_2 concentrations (Defra, 2023b), 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 Gray's Inn Road, adjacent to the proposed development. The Greater London Urban Area has thus been reported as exceeding the limit value for annual mean NO_2 concentrations. Defra's predicted concentrations for 2023 (Defra, 2020) do not identify any exceedances adjacent to the application site. As such, there is considered to be no risk of a limit value exceedance in the vicinity of the proposed development by the time that it is operational.

6.18 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 Mayor's Transport Strategy.

Background Concentrations

6.19 Estimated background concentrations at the proposed development are set out in Table 10 and are below the respective objectives.

Table 10: Estimated Annual Mean Background Pollutant Concentrations in 2022 and 2025 (µg/m^3)

Year	NO_2[a]	PM_{10}[b]	$PM_{2.5}$[b]
2022	26.0	19.3	12.3
2025	24.5	18.6	11.8
Objective / GLA target	**40**	**40**	**20/10** [c]

[a] Defra background for NO_2 for 2022 based on site specific background monitoring results at GR6. Defra background for 2025 adjusted based on background measured concentrations – see paragraph 5.9 for details.

[b] Defra background for PM_{10} and $PM_{2.5}$ concentrations unadjusted – see paragraph 5.9 for details.

[c] The 20 µg/m^3 $PM_{2.5}$ objective, which was 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.

7 Construction Phase Impact Assessment

Construction Traffic

7.1 The construction works have the potential to generate traffic throughout the construction phase. It is not known at this stage how many vehicles will have access to the Site on any given day, however, given the scale of the Site, it is anticipated that as an annual average, movements to and from the Site will not exceed the screening threshold of 25 Heavy Duty Vehicles (HDVs) recommended for use within an AQMA in the EPUK/IAQM Guidance (Moorcroft and Barrowcliffe et al, 2017). In addition, these movements will be temporary and thus will not have a significant lasting effect on local air quality.

7.2 It is, therefore, not considered necessary to assess the impacts of traffic emissions during the construction phase, and it is judged that the proposed development will not have a significant effect on local roadside air quality during the construction phase.

On-Site Exhaust Emissions

7.3 The IAQM guidance (IAQM, 2016) states:

"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. For site plant and on-site traffic, consideration should be given to the number of plant/vehicles and their operating hours and locations to assess whether a significant effect is likely to occur".

7.4 The proposed development is relatively small, thus the number of NRMM able to operate at any one time will be limited. The proposed development is also located in an opportunity area and all NRMM operating within this area need to meet stage IV emissions standards. With these standards in place, it is judged that the risk of significant effects at existing receptors as a result of on-site machinery emissions is low.

Construction Dust and Particulate Matter Emissions

7.5 The construction works will give rise to a risk of dust impacts during demolition, earthworks and construction, as well as from trackout of dust and dirt by vehicles onto the public highway. Step 1 of the assessment procedure is to screen the need for a detailed assessment. There are receptors within the distances set out in the guidance (see Appendix A2), thus a detailed assessment is required. The following section sets out Step 2 of the assessment procedure.

Potential Dust Emission Magnitude

Demolition

7.6 There will be a requirement to demolish all existing buildings within the Site, with the exception of the westernmost hospital building at 330 Gray's Inn Road. This equates to a total volume of approximately 40,000 - 50,000 m^3 of building to be demolished. Demolition will occur up to 26 m above ground level and comprise potentially dusty construction material, such as concrete. Based on the example definitions set out in Table A2.1 in Appendix A2, the dust emission class for demolition is considered to be *large.*

Earthworks

7.7 The characteristics of the soil at the site have been defined using the British Geological Survey's UK Soil Observatory website (British Geological Survey, 2022), as set out in Table 11. Overall, it is considered that, when dry, this soil has the potential to be moderately dusty.

Table 11: Summary of Soil Characteristics

Category	Record
Soil Layer Thickness	Deep
Soil Parent Material Grain Size	Argillaceous [a]
European Soil Bureau Description	Prequaternary Marine/Estuarine Sand and Silt
Soil Group	Medium to Light (Silty) to Heavy
Soil Texture	Clayey Loam [b] to Silty Loam

[a] grain size < 0.06 mm.

[b] a loam is composed mostly of sand and silt.

7.8 The Site covers approximately 5,400 m^2 and most of this will be subject to earthworks, involving removal of the foundations of the demolished buildings and excavating the basement area. Dust will arise mainly from vehicles travelling over unpaved ground and from the handling of dusty materials (such as dry soil). Based on the example definitions set out in Table A2.1 in Appendix A2, the dust emission class for earthworks is considered to be *large*.

Construction

7.9 Construction will comprise two residential blocks, office building and a larger hotel block, with a total building volume of at least 100,000 m^3 constructed of brick and other materials. Dust will arise primarily from the handling and storage of dusty materials, and from the cutting of concrete. Based on the example definitions set out in Table A2.1 in Appendix A2, the dust emission class for construction is considered to be *large*.

Trackout

7.10 The number of heavy vehicles accessing the Site, which may track out dust and dirt, is currently unknown, but given the size of the Site it is unlikely to be more than a maximum of 10-50 outward heavy vehicle movements per day. During the majority of the construction period vehicles are unlikely to have travelled over unpaved ground In order to be conservative, based on the example definitions set out in Table A2.1 in Appendix A2, the dust emission class for trackout is considered to be *medium*.

7.11 Table 12 summarises the dust emission magnitude for the proposed development.

Table 12: Summary of Dust Emission Magnitude

Source	Dust Emission Magnitude
Demolition	Large
Earthworks	Large
Construction	Large
Trackout	Medium

Sensitivity of the Area

7.12 This assessment step combines the sensitivity of individual receptors to dust effects with the number of receptors in the area and their proximity to the site. It also considers additional site-specific factors such as topography and screening, and in the case of sensitivity to human health effects, baseline PM_{10} concentrations.

7.13 The IAQM guidance, upon which the GLA's guidance is based, explains that residential properties and student dwellings are 'high' sensitivity receptors to dust soiling, while places of work are 'medium' sensitivity receptors (Table A2.2 in Appendix A2). There are at least 100 dwellings within 20 m of the Site (see Figure 6) situated primarily within the Depot Point student accommodation block adjacent to Wicklow Street and along Swinton Street. However, it should be noted that a significant proportion of these dwellings is temporary accommodation, with little amenity space which could be impacted by dust soiling.

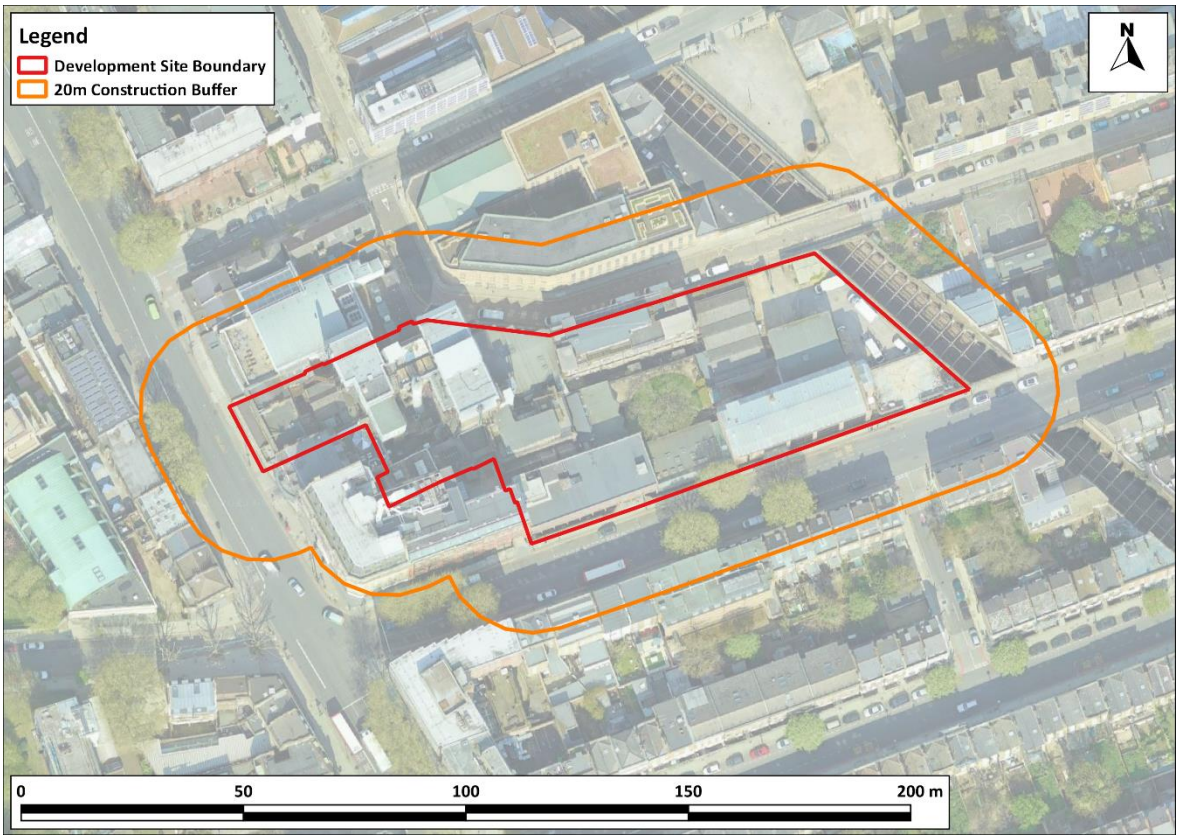

Figure 6: 20 m Distance Bands around Site Boundary

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7.14 Table 12 shows that the dust emission magnitude for trackout is *medium* and Table A2.3 in Appendix A2 thus explains that there is a risk of material being tracked 200 m from the Site exit. Since it is not known which roads construction vehicles will use, it has been assumed that all possible routes could be affected. There are more than 100 residential dwellings within 20 m of the roads along which material could be tracked (see Figure 7).

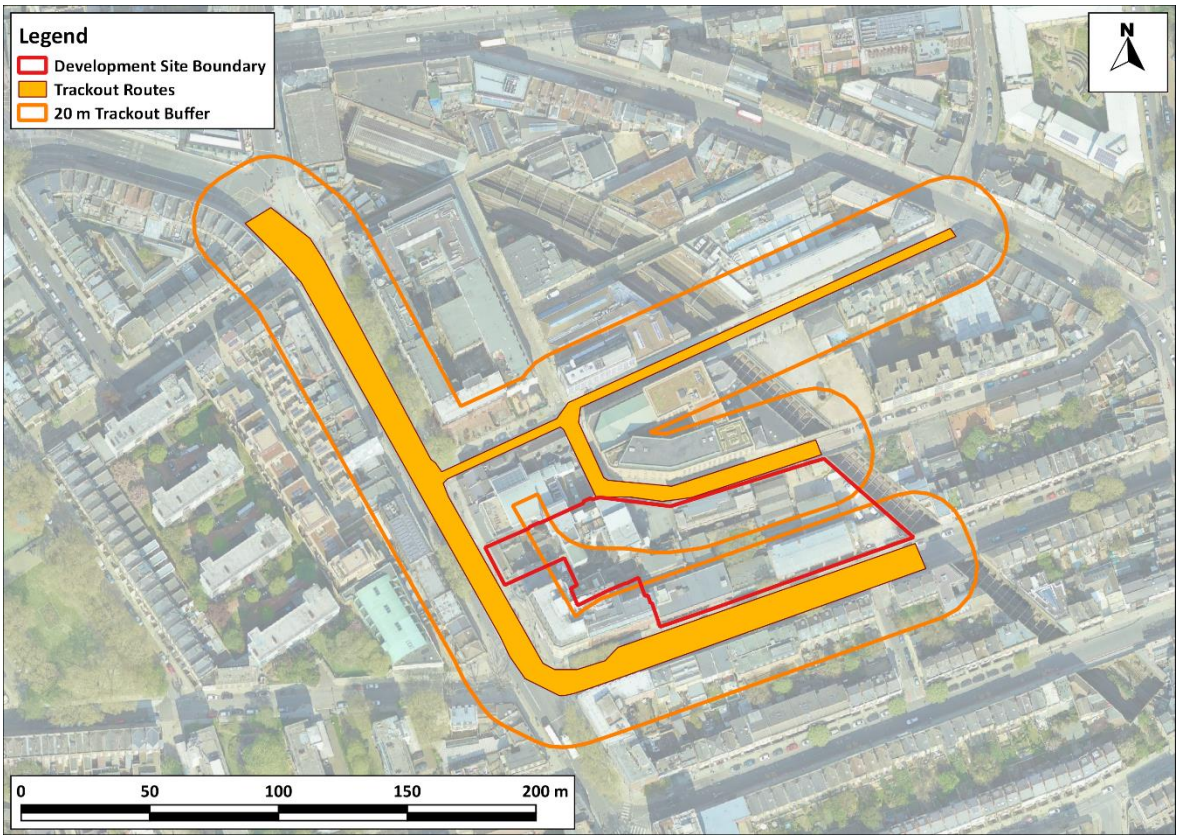

Figure 7: 20 m Distance Band around Roads Used by Construction Traffic Within 200 m of the Site

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Sensitivity of the Area to Effects from Dust Soiling

7.15 Using the information set out in Paragraph 7.13 and Figure 6 alongside the matrix set out in Table A2.3 in Appendix A2, the area surrounding the onsite works is of 'high' sensitivity to dust soiling. Using the information set out in Paragraph 7.14 and Figure 7 alongside the same matrix, the area is also of 'high' sensitivity to dust soiling due to trackout.

Sensitivity of the Area to any Human Health Effects

7.16 The matrix in Table A2.4 in Appendix A2 requires information on the baseline annual mean PM_{10} concentration in the area. The properties nearest the Site are situated on Swinton Street, along which PM_{10} concentrations have been modelled (receptors 1-5). The maximum predicted 2022 baseline PM_{10} concentration at these receptors is 19.3 µg/m^3 at basement level. This prediction is made using the same worst-case assumptions as specified in paragraph 5.25. Using the information set out in Paragraphs 7.13 and Figure 6 alongside the matrix in Table A2.4 in Appendix A2, the area surrounding the onsite works is of 'medium' sensitivity to human health effects. Using the information

set out in Paragraph 7.14 and Figure 7 alongside the same matrix, the area surrounding roads along which material may be tracked from the site is also of 'medium' sensitivity.

Sensitivity of the Area to any Ecological Effects

7.17 The guidance only considers designated ecological sites within 50 m to have the potential to be impacted by the construction works. There are no designated ecological sites within 50 m of the site boundary or those roads along which material may be tracked, thus ecological impacts will not be considered further.

Summary of the Area Sensitivity

7.18 Table 13 summarises the sensitivity of the area around the proposed construction works.

Table 13: Summary of the Area Sensitivity

Effects Associated With:	Sensitivity of the Surrounding Area	
	On-site Works	Trackout
Dust Soiling	High Sensitivity	High Sensitivity
Human Health	Medium Sensitivity	Medium Sensitivity

Risk and Significance

7.19 The dust emission magnitudes in Table 12 have been combined with the sensitivities of the area in Table 13 using the matrix in Table A2.6 in Appendix A2, in order to assign a risk category to each activity. The resulting risk categories for the four construction activities, without mitigation, are set out in Table 14. These risk categories have been used to determine the appropriate level of mitigation as set out in Section 10 (step 3 of the assessment procedure).

Table 14: Summary of Risk of Impacts Without Mitigation

Source	Dust Soiling	Human Health
Demolition	High Risk	High Risk
Earthworks	High Risk	Medium Risk
Construction	High Risk	Medium Risk
Trackout	Medium Risk	Low Risk

7.20 The IAQM guidance does not provide a method for assessing the significance of effects before mitigation, and advises that pre-mitigation significance should not be determined. With appropriate mitigation in place, the IAQM guidance is clear that the residual effect will normally be 'not significant' (IAQM, 2016).

8 Operational Phase Impact Assessment

Impacts at Existing Receptors

Assessment of Development-Generated Road Traffic Emissions

8.1 TO BE COMPLETED.

Assessment of Energy Plant Emissions

8.2 The proposed development will include two, 2.25MVA backup diesel generators, located on the roof of the office building at 49.7m above ground level. Alternative technologies for the diesel generators which avoid onsite combustion have been considered by the design team but were not deemed to be viable. Battery storage would be the most mature alternative but due to the energy storage density of batteries the space requirements would be excessive compared to the equivalent diesel fuel tank. The capital cost of batteries is also much larger and they would need to be replaced several times over the life of a single diesel generator. Emergencies that require the generators to be used are incredibly infrequent.

8.3 The size of the generators, and the electrical load of the development as a whole, is driven by the gas-free heat strategy. All-electric heating strategy for the development has been adopted which eliminates all on-site combustion emissions under normal circumstances but means that the building is more reliant on the electrical supply to remain operational. Therefore, the standby generator has been sized such that the office and hotel buildings can remain operational and habitable in the event of a mains power failure.

8.4 The generator will only be used under two conditions; while testing on-load and in the event of an electrical blackout. Testing will occur monthly, for half an hour, with generators on-load, meaning they will only temporarily increase local pollutant concentrations once a month. As pollutant concentrations will only be raised for a small number of short periods, there will be a negligible impact on annual mean pollutant concentrations and this need not be considered.

8.5 The principal concern in relation to emergency generators are the short term impacts with regards to the NO_2 1-hour mean objective, which limits concentrations above 200µg/m^3 to 18 occurrences per year. It is necessary to first consider baseline concentrations within the area, to determine whether the testing of the generators will lead to more than 18 exceedances each year. Existing monitoring on the busier Euston Road (CD9), identifies only two exceedances of the 1-hour objective in 2022 have been measured. The generators are tested monthly (i.e. 12 times a year) for a maximum of 30 minutes. Therefore, the testing of the emergency generators are unlikely to lead to hourly exceedances of 200ug/m^3 more than 18 times per year, at any receptor.

8.6 In addition, the location of any impacts will vary depending on the wind direction during the test, and thus it is unlikely that the same location would be affected during all twelve of the monthly tests in a year.

8.7 Furthermore, the flues will exhaust at a point where dispersion will be good (terminating at 3 m above roof level). The emission release is at height (49.7m), well above ground level, where concentrations are lower than at ground level which is more sensitive due to road traffic emissions and locations of public exposure. Therefore, the testing of the generator is unlikely to lead to exceedances of the 1-hour mean objective or considerably contribute to emissions within the air quality focus area.

8.8 Emissions from emergency generators are not required to meet emission standards, however in order to minimise emissions from the testing of the emergency generators, installation of generators which minimise emissions will be discussed with the generator supplier.

Assessment of Impacts of the Relocated Laboratory Flue

8.9 FINDINGS OF THE RWDI ASSESSMENT TO BE SUMMARISED HERE.

Impacts of Existing Sources on Future Residents and Users of the Development

Assessment of Emissions from the Local Road Network on Future Occupiers

Residential Uses

8.10 Predicted air quality conditions for future residents of the proposed development, taking account of emissions from the adjacent road network, are set out in Table 15 for Receptors 1 to 14 (see Table 3 and Figure 3 for receptor locations). Concentrations have been predicted at all floors, but results are presented only for the lowest floors and those closest to exceeding the objective. The results show that at all locations NO_2 concentrations are below the annual mean objective (40 µg/m^3), even when using the conservative modelling assumption based on 2022, which assumes no improvement in emissions or background concentrations. Concentrations are also below the respective objectives for PM_{10} and $PM_{2.5}$.

8.11 Air quality for future residents and users of the development, without mitigation, will thus be acceptable in all locations. Therefore, additional mitigation measures to minimise exposure for residents and users to high concentrations of air pollutants are unlikely to be required (see Section 10 for further details).

Table 15: Predicted Annual Mean Concentrations of NO_2, PM_{10} and $PM_{2.5}$ for New Receptors in the Proposed Development (µg/m^3)

Receptor		2025			2022 (assuming no future reduction in concentrations)		
		NO_2	PM_{10}	$PM_{2.5}$	NO_2	PM_{10}	$PM_{2.5}$
Basement							
1	Resi – South, Swinton Street	34.4	19.9	12.5	37.7	20.6	13.1
2	Resi – South, Swinton Street	26.0	18.9	11.9	27.9	19.5	12.4
3	Resi – South, Swinton Street	26.6	18.9	12.0	28.5	19.6	12.4
4	Resi – South, Swinton Street	30.5	19.4	12.2	33.2	20.1	12.7
5	Resi – South, Swinton Street	31.9	19.6	12.3	34.8	20.3	12.9
6	Resi - South	28.7	19.2	12.1	31.0	19.9	12.6
7	Resi – South, Courtyard	27.4	19.0	12.0	29.5	19.7	12.5
8	Resi – South, Courtyard	27.3	19.0	12.0	29.4	19.7	12.5
9	Resi – South, Courtyard	26.1	18.9	11.9	27.9	19.5	12.4
10	Resi – South, Courtyard	25.8	18.8	11.9	27.6	19.5	12.4
11	Resi – South, Courtyard	25.8	18.8	11.9	27.6	19.5	12.4
Ground							
1	Resi – South, Swinton Street	34.2	19.9	12.5	37.6	20.6	13.0
2	Resi – South, Swinton Street	26.0	18.9	11.9	27.8	19.5	12.4
3	Resi – South, Swinton Street	26.5	18.9	12.0	28.4	19.6	12.4
4	Resi – South, Swinton Street	29.5	19.3	12.2	32.0	20.0	12.7
5	Resi – South, Swinton Street	31.5	19.5	12.3	34.4	20.2	12.8
12	Resi – North, Wicklow Street	25.5	18.8	11.9	27.3	19.5	12.4
13	Resi – North, Wicklow Street	25.4	18.8	11.9	27.1	19.5	12.3
14	Resi – North, Wicklow Street	25.4	18.8	11.9	27.1	19.4	12.3
1st Floor							
1	Resi – South, Swinton Street	33.1	19.7	12.4	36.2	20.5	13.0
2	Resi – South, Swinton Street	25.9	18.8	11.9	27.7	19.5	12.4
3	Resi – South, Swinton Street	26.2	18.9	11.9	28.1	19.6	12.4
4	Resi – South, Swinton Street	28.0	19.1	12.1	30.3	19.8	12.6
5	Resi – South, Swinton Street	29.5	19.3	12.2	31.9	20.0	12.7
3rd Floor							
1	Resi – South, Swinton Street	31.3	19.5	12.3	34.1	20.2	12.8
2	Resi – South, Swinton Street	26.2	18.9	11.9	28.1	19.6	12.4
3	Resi – South, Swinton Street	26.4	18.9	11.9	28.3	19.6	12.4
4	Resi – South, Swinton Street	26.4	18.9	11.9	28.3	19.6	12.4
5	Resi – South, Swinton Street	27.6	19.0	12.0	29.7	19.7	12.5
Objective / Criterion		**40**	**32** [a]	**20**	**40**	**32** [a]	**20**

[a] While the annual mean PM_{10} objective is 40 µg/m^3, 32 µg/m^3 is the annual mean concentration above which an exceedance of the 24-hour mean PM_{10} objective is possible, as outlined in LAQM.TG22 (Defra, 2022e). A value of 32 µg/m^3 is thus used as a proxy to determine the likelihood of exceedance of the 24-hour mean PM_{10} objective, as recommended in EPUK & IAQM guidance (Moorcroft and Barrowcliffe et al, 2017).

[b] The 20 µg/m^3 $PM_{2.5}$ objective, which was to be met by 2020, is not in Regulations and there is no requirement for local authorities to meet it.

Hotel Uses

8.12 Predicted air quality conditions for users of the hotel portion of the development are set out in Table 16 for Receptors 15 to 20. As discussed in paragraph 5.6, the proxy concentration of 60 µg/m^3 has been used to determine whether air quality is acceptable within the hotel. The results show that concentrations are well below the objective at all worst-case locations within the building, even when using the conservative modelling assumptions which assume no improvement in emissions or background concentrations. The results are also below the more stringent annual mean NO_2 objective of 40µg/m^3.

8.13 Concentrations of PM_{10} and $PM_{2.5}$ are also below the respective objectives. Therefore, air quality will thus be acceptable for all future users of the hotel.

Table 16: Predicted Annual Mean Concentrations of NO_2, PM_{10} and $PM_{2.5}$ for Hotel Receptors in the Proposed Development (µg/m^3)

Receptor		2025			2022 (assuming no future reduction in concentrations)		
		NO_2	PM_{10}	$PM_{2.5}$	NO_2	PM_{10}	$PM_{2.5}$
Ground							
15	Hotel – Reception and Cafe	30.1	20.2	12.7	33.4	20.9	13.2
16	Hotel – Reception and Cafe	30.0	20.2	12.7	33.2	20.9	13.2
17	Hotel – Reception and Cafe	30.0	20.2	12.7	33.2	20.9	13.2
1st Floor							
18	Hotel - Rooms	28.9	19.9	12.5	31.8	20.6	13.0
19	Hotel - Rooms	29.0	19.9	12.5	31.8	20.6	13.0
20	Hotel - Rooms	29.1	19.9	12.5	32.0	20.6	13.0
Objective / Criterion		**60**	**32 [a]**	**20**	**60**	**32 [a]**	**20**

[a] While the annual mean PM_{10} objective is 40 µg/m^3, 32 µg/m^3 is the annual mean concentration above which an exceedance of the 24-hour mean PM_{10} objective is possible, as outlined in LAQM.TG16 (Defra, 2018b). A value of 32 µg/m^3 is thus used as a proxy to determine the likelihood of exceedance of the 24-hour mean PM_{10} objective, as recommended in EPUK & IAQM guidance (Moorcroft and Barrowcliffe et al, 2017).

[b] The 20 µg/m^3 $PM_{2.5}$ objective, which was to be met by 2020, is not in Regulations and there is no requirement for local authorities to meet it.

Office Uses

8.14 Predicted air quality conditions for users of the office portion of the development are set out in Table 17 for Receptors 21 and 22. As discussed in Paragraph 4.7, office uses do not represent relevant exposure to any of the national air quality objectives (but are protected by occupation exposure limits for common pollutants) and are therefore not sensitive, however they have been presented in the report for reference.

Table 17: Predicted Annual Mean Concentrations of NO_2, PM_{10} and $PM_{2.5}$ for Office Receptors in the Proposed Development (µg/m^3)

Receptor		2025			2022 (assuming no future reduction in concentrations)		
		NO_2	PM_{10}	$PM_{2.5}$	NO_2	PM_{10}	$PM_{2.5}$
Ground							
21	Office	34.3	19.9	12.5	37.6	20.6	13.1
22	Office	34.6	20.0	12.6	38.0	20.7	13.1
21	Office	32.7	19.7	12.4	35.8	20.4	12.9
22	Office	33.0	19.7	12.4	36.1	20.5	13.0
21	Office	29.3	19.3	12.2	31.7	19.9	12.6
22	Office	29.4	19.3	12.2	31.9	20.0	12.7
Objective / Criterion[a]		-	-	-	-	-	-

[a] As discussed in Paragraph 4.7, office uses do not represent relevant exposure to any of the national air quality objectives (but are protected by occupation exposure limits for common pollutants) and are therefore not sensitive, however they have been presented in the report for reference

Comparison against the GLA and CPG Criteria

8.15 A comparison of the above modelled concentrations against the CPG Criteria is presented in Appendix A6. Only the results for the residential uses of the proposed development have been considered as the criteria are annual means and therefore would not apply at the hotel or office areas of the proposed development (see Paragraph 5.7).

8.16 The results demonstrate that at the residential development, modelled concentrations of NO_2 and PM_{10} are below the CPG WHO guidelines of 38µg/m^3 for NO_2 and 20µg/m^3 for PM_{10} in 2025. When using the highly conservative modelling assumptions for 2022 assuming no reduction in emissions, three residential receptor locations (1, 4 and 5)marginally exceeds the PM_{10} objective of 20µg/m^3. These are all on the Swinton Street façade.

8.17 The residential receptors exceed the $PM_{2.5}$ CPG criteria of 10ug/$m^{3,}$ which is the same as the GLA $PM_{2.5}$ target, which has a target compliance date of 2030. Exceedances of the guideline are common and their nationwide achievement is very unlikely to be possible before 2030, especially in London (Defra, 2019a). The need for additional mitigation with respect to the Camden CPG criteria is discussed further in Paragraphs 9.12 to 9.18.

Significance of Operational Air Quality Effects

8.18 The operational air quality effects without mitigation, with regard to the impact of the development on existing air quality, are judged to be 'not significant'. This professional judgement is made in accordance with the methodology set out in Appendix A3, and takes account of the assessment that:

- TBC
- the impact of the backup diesel generators on local air quality will not cause an exceedance of the objectives; and
- Without mitigation, concentrations at the worst-case locations at the proposed development are predicted to be below the respective air quality objectives, and therefore air quality at these receptors is judged to be acceptable and additional mitigation measures are not necessary.

9 'Air Quality Neutral'

9.1 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, 2021), which is currently in consultation stage.

Building Emissions

9.2 The proposed development will be provided with heat and hot water by electric boilers and ASHPs and will thus have no direct building emissions. It will include an emergency diesel generator, however the GLA's Air Quality Neutral guidance states that "*backup plant installed for emergency and life safety power supply, such as diesel generators, may be excluded from the calculation of predicted building emissions".* The proposed development is, therefore, better than air quality neutral in terms of building emissions.

Road Transport Emissions

TBC

Summary

9.3 The building and transport related emissions associated with the proposed development are both below the relevant benchmarks. The proposed development therefore complies with the requirement that all new developments in London should be at least air quality neutral.

10 Mitigation

Good Design and Best Practice

10.1 The EPUK/IAQM guidance advises that good design and best practice measures should be considered, whether or not more specific mitigation is required. The proposed development incorporates the following good design and best practice measures, which have been accounted for in the assessment as far as is possible:

- adoption of a Dust Management Plan (DMP) or Construction Environmental Management Plan (CEMP) to minimise the environmental impacts of the construction works;
- within the Site Travel Plan:
    - encouraging walking and cycling via provision of cycle parking in accordance with the Draft London Plan (GLA, 2019a) and London Cycling Design (TfL, 2014) standards, providing pedestrian links in the wider area, including LBC's Route 1, and establishing a regular meeting to discuss cycle issues;
    - encouraging the use of public transport by providing real-time passenger information at key locations;
    - only providing accessible car parking at 3% of the total residential units with no further eligibility to apply for permits at any controlled parking zone outside of the Site;
    - provision of access to car clubs within the Site and any initiatives agreed with the car club operator; and
    - promotion of smarter working and living practices by highlighting proximity to transport links and allowing for internet connection to promote online grocery shopping.
- within the Site Framework Travel Plan:
    - encouraging walking and cycling via provision of cycle parking in accordance with the Draft London Plan (GLA, 2019a) standards, providing pedestrian links in the wider area, organising cycle training and maintenance for employees and provision of forum bike user group forum to raise issues with relevant stakeholders;
    - encouraging the use of public transport by providing real-time passenger information at key locations;
    - encouraging best use of cars and servicing vehicles by limiting car parking for non-residential uses, provision of car club operator for each all business, recommendation of suitable car sharing website; and

    - promotion of smarter working and living practices by promoting teleconferencing in place of face-to-face meetings and consideration of flexible jpirs, with shift hours co-ordinated to public transport operating times.

- use of air source heat pumps for heating, which have zero associated emissions;
- collaboration with the adjacent landlord and occupier's professional consultant team in positioning neighbouring flues to minimise building emission impacts on future residents and users of the development;
- design of the development to maximise the distance between local sources and the most sensitive residential uses. This includes:
    - No residential uses at the Gray's Inn Road façade; and
    - Residential properties on the Swinton Street façade are dual aspect, allowing ventilation from the courtyard façade and with the walkway positioned to maximise the distance from the road.
- provision of mechanical ventilation with air extracted away from the most polluting local sources to provide the cleanest possible air to residents (discussed further in paragraph 10.18). The development will also be provided with comfort cooling so that there is no residual reliance on natural ventilation. The designed mechanical ventilation strategy comprises MVHR with air intakes located:
    - at roof level for the office building and guest rooms of the hotel;
    - at the courtyard façade for the southern block of the residential building (on Swinton Street);
    - at all facades for the northern block of the residential building (on Wicklow Street);
    - on Wicklow Street for the hotel lobby and restaurant; and,
    - on Grays Inn Road for the hotel café;
- provision of extract ventilation from the commercial cooking premises at the hotel. Odour control will be fitted to the air handling units (AHUs) as required to ensure no residual odour impacts. The flues from the cooking premises will discharge on the ground floor at a high-level accessed from the Wicklow Street courtyard.

Recommended Mitigation

Construction Impacts

10.2 Measures to mitigate dust emissions will be required during the construction phase of the development in order to minimise effects upon nearby sensitive receptors.

10.3 The site has been identified as a *High* Risk site during demolition, earthworks and construction and *Medium* Risk for trackout, as set out in Table 14. The GLA's SPG on *The Control of Dust and Emissions During Construction and Demolition* (GLA, 2014b) describes measures that should be employed, as appropriate, to reduce the impacts, along with guidance on what monitoring should be undertaken during the construction phase. This reflects best practice experience and has been used, together with the professional experience of the consultant who has undertaken the dust impact assessment and the findings of the assessment, to draw up a set of measures that should be incorporated into the specification for the works. These measures are described in Appendix A11.

10.4 The mitigation measures should be written into a dust management plan (DMP). The DMP may be integrated into a Code of Construction Practice or the Construction Environmental Management Plan, and may require monitoring. The GLA's guidance suggests that, for a High Risk site, "*a minimum of two automatic particulate monitors to measure PM_{10} levels*" will be required. Meanwhile, the Air Quality CPG says "*Medium risk schemes usually require a minimum of two real time monitors, while high risk schemes usually require four*."

10.5 The GLA guidance also states that, on certain sites, it may be appropriate to determine the existing (baseline) pollution levels before work begins but "*In most situations, baseline monitoring may not be required, e.g. in some urban areas where there is a large existing body of monitoring data (and where these sites are expected to continue to operate throughout the duration of the construction works)*." As there is a lot of long-term dust monitoring on-going in the Euston area and other sites nearby, it therefore may not be necessary to conduct baseline construction monitoring.

10.6 However, the guidance is clear that the Local Authority should advise as to the appropriate air quality monitoring procedure and timescale on a case-by-case basis.

10.7 Where mitigation measures rely on water, it is expected that only sufficient water will be applied to damp down the material. There should not be any excess to potentially contaminate local watercourses.

Road Traffic Impacts

10.8 The assessment has demonstrated that future users and residents of the proposed development will be exposed to pollutants concentrations below the respective air quality objectives in the year of opening, even when using the worst-case modelling assumptions requested by LB of Camden which assume no improvement in emissions or background concentrations between 2022 and 2025. Therefore, the overall air quality effect of the proposed development will be 'not significant'; it will not introduce any new exposure into areas of unacceptable air quality, nor will the development-generated traffic emissions have a significant impact on local air quality. It is, therefore, not considered necessary to propose further mitigation measures for this development beyond those included within the design (as described above).

10.9 Mitigation measures to reduce pollutant emissions from road traffic are principally being delivered in the longer term by the introduction of more stringent emissions standards, largely via European legislation (which is written into UK law). The local air quality plan that the GLA is required to produce in order to address limit value exceedances in its area will also help to improve air quality; the implementation of a ULEZ can reasonably be expected to lead to significant improvements. The Council Local Transport Plan also details policies and actions which will improve local air quality, including encouraging the use of electric vehicles within the borough. The Council's Air Quality Action Plan will also be helping to deliver improved air quality.

Energy Plant Impacts

10.10 The assessment has demonstrated that the emissions from the backup generators within the proposed development will have an insignificant impact on air quality. As such, there is no requirement for mitigation. The energy plant installed within the Site will, however, be located on the roof and be tested for no more than twelve hours per year; if the installed plant were not to conform to these specifications, additional assessment and/or mitigation would be required

Relocation of Laboratory Flues

10.11 FINDINGS OF THE RWDI ASSESSMENT TO BE SUMMARISED HERE.

Air Quality Neutral

10.12 The road traffic movements predicted for the proposed development are below the benchmark derived for an average development of this nature in inner London. The proposed development is also better than air quality neutral with respect to building emissions. Therefore, no further mitigation is recommended in this regard.

Need for Additional Mitigation with respect to Camden Criteria

10.13 Condition 50 of the planning permission granted for the previous schemes states that mitigation should include *"non-openable windows for any residential areas where the air quality is more than 5% over the WHO Standard, Particulate Matter filtration, and a requirement on the RP to advise all residents about air quality issues where housing is in a location which has poor air quality*". The WHO standard in this instance is considered to be that stated in the CPG presented in Table 2.

10.14 As presented in Appendix A6 and discussed in Section 7, modelled concentrations of NO_2 and PM_{10} do not exceed Camden criteria in 2025 and when assuming the highly conservative modelling assumptions of no emission reduction from 2022, three receptors on Swinton Street marginally exceed the PM_{10} criteria. It is only the $PM_{2.5}$ concentrations which the criteria in the residential areas in 2025.

10.15 The $PM_{2.5}$ Camden criteria of 10µg/m^3 is the same as the GLA target, which has a compliance date of 2030. Exceedances of this guideline are common and their nationwide achievement is very unlikely to be possible before 2030, especially in London (Defra, 2019a). It therefore would be overly stringent to implement mitigation such as non-openable windows and have particulate matter filtration on the basis that modelled $PM_{2.5}$ concentrations in the opening year of 2025 are above the Camden criteria, especially given the prevalence of exceedances of this guideline across the UK.

10.16 Given the number of national, regional and local measures being implemented to achieve the WHO $PM_{2.5}$ guideline by 2036, concentrations of $PM_{2.5}$ are only likely to be above the guideline in the first few years of the development; the measures just in Defra's Clean Air Strategy are predicted to achieve an 95% reduction in population exceedance of a $PM_{2.5}$ concentration of 10µg/m^3 in 2030 (Defra, 2019a). Furthermore, local automatic monitoring data has shown an improvement in local $PM_{2.5}$ concentrations. However, Defra backgrounds (which do not account for all the measures improving $PM_{2.5}$ concentrations) were used for the assessment in accordance with the Air Quality CPG. Therefore, the requirement for non-openable windows and particulate matter filtration is unlikely to be necessary for the majority of the life of the proposed development with respect to $PM_{2.5}$ concentrations, (if at all given the conservative modelling assumptions) yet will result in substantial additional cost to the developer and would provide a lower level of amenity for residents.

10.17 The use of fine filters to remove a high percentage of $PM_{2.5}$ would also have a significant carbon cost. This is because more energy is required to achieve the required air flow through the system. This conflicts with other aspects of Camden and London policy that aim to minimise energy use associated with heating and cooling.

10.18 Nevertheless, measures to minimise the ingress of pollutants into the residential areas are prudent as part of good design. Whilst openable windows are provided, there is **no need for these to be opened for ventilation or cooling purposes and therefore no need for a sealed façade** on Swinton Street. The building has been designed such that that there is no need for occupants to open their windows for ventilation purposes. All the ventilation requirements for the residential buildings will be provided by the mechanical ventilation system. There is no need to rely on natural ventilation or opening windows, even during particularly hot days of the year, as comfort cooling is provided. Furthermore, the air intakes for the residential building are located away from roadside facades, located at the rear of on the southern block Swinton Street where air quality at receptors 9, 10 and 11 has been shown to be much better than on Swinton Street and to provide better air quality into the building.

10.19 Nevertheless, it is agreed that there is no disbenefit in advising all residents about air quality at the site (as per Condition 50), especially with respect to $PM_{2.5}$, so that residents are aware of the potential impacts associated with opening of windows.

11 Residual Impacts and Effects

Construction

11.1 The IAQM guidance, on which the GLA's guidance is based, is clear that, with appropriate mitigation in place, the residual effects will normally be 'not significant'. The mitigation measures set out in Section 10 and Appendix A9 are based on the GLA guidance. With these measures in place and effectively implemented the residual effects are judged to be 'not significant'.

11.2 The IAQM guidance does, however, recognise that, even with a rigorous dust management plan in place, it is not possible to guarantee that the dust mitigation measures will be effective all of the time, for instance under adverse weather conditions. During these events, short-term dust annoyance may occur, however, the scale of this would not normally be considered sufficient to change the conclusion that overall the effects will be 'not significant'.

Operation

11.3 The residual impacts will be the same as those identified in Section 8. The overall effects of the proposed development will be 'not significant'.

12 Conclusions

12.1 The assessment has considered the impacts of the proposed development on local air quality in terms of dust and particulate matter emissions during construction and emissions from road traffic generated by the completed and occupied development. It has also identified the air quality conditions that future residents/users will experience and whether or not the proposed development is air quality neutral (as required by the London Plan).

Construction Impacts

12.2 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. Appropriate measures have been recommended and, with these measures in place, it is expected that any residual effects will be 'not significant'.

Operational Impacts

Impacts

12.3 Air quality conditions for future residents of the proposed development have been shown to be acceptable, with concentrations below the air quality objectives throughout the site, even when applying the highly conservative modelling assumptions required within the Camden CPG assuming to improvements in future emissions.

12.4 **TBC IMPACTS FROM RWDI REPORT AND TRAFFIC GENERATED BY THE DEVELOPMENT**.

12.5 The assessment has also demonstrated that the emissions from the additional traffic generated by the proposed development, and backup diesel generators, will have a negligible impact on air quality conditions at all existing receptors.

Significance

12.6 The overall operational air quality effects of the proposed development are judged to be 'not significant'. This conclusion is based on the concentrations for future residents and users of the development being below the relevant objective and the impact of development-generated traffic and generators being negligible.

12.7 As the impacts of the proposed development are not significant, additional mitigation measures are unlikely to be required. However, a number of best practice measures have been included within the design of the proposed development to reduce the impact of the proposed development on air quality and to ensure residents are provided with acceptable air quality, including a fully mechanical ventilation strategy which does not rely on the need for openable windows and which intakes air from locations away from the main roads.

Air Quality Neutral

12.8 The transport related emissions associated with the proposed development is below the relevant benchmark and there would be no on-site emissions associated with heating and power generation. The proposed development therefore complies with the requirement that all new developments in London should be at least air quality neutral.

Policy Implications

12.9 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.

12.10 The proposed development is compliant with Policy SI 1 of the London Plan in the following ways:

- it will not cause exceedances of legal air quality limits;
- it will not create unacceptable risk of high levels of exposure to poor air quality;
- design solutions have been used to address air quality issues rather than post-design mitigation, including design measures to minimise exposure; and
- it will be air quality neutral.

12.11 The proposed development is also consistent with Policies A1 of LB of Camden's Local Plan, as development generated traffic will not have a significant detrimental effect on air quality, and hence the amenity. It is also consistent with Policy CC4, as the development does not increase exposure to poor air quality, impacts during construction have been assessed and mitigation has been proposed.

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14 Glossary

AADT	Annual Average Daily Traffic
ADMS-Roads	Atmospheric Dispersion Modelling System model for Roads
AQAL	Air Quality Assessment Level
AQC	Air Quality Consultants
AQMA	Air Quality Management Area
AURN	Automatic Urban and Rural Network
BEB	Building Emissions Benchmark
CAZ	Clean Air Zone
CEMP	Construction Environmental Management Plan
CHP	Combined Heat and Power
CROW	Countryside and Rights of Way Act
Defra	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DMP	Dust Management Plan
EFT	Emission Factor Toolkit
EPUK	Environmental Protection UK
EU	European Union
EV	Electric Vehicle
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
Focus Area	Location that not only exceeds the annual mean limit value for NO_2 but also has a high level of human exposure
GIA	Gross Internal Floor Area
GLA	Greater London Authority
HDV	Heavy Duty Vehicles (> 3.5 tonnes)
HGV	Heavy Goods Vehicle
HMSO	Her Majesty's Stationery Office
IAQM	Institute of Air Quality Management

JAQU	Joint Air Quality Unit
kph	Kilometres Per hour
kW	Kilowatt
LAEI	London Atmospheric Emissions Inventory
LAQM	Local Air Quality Management
LB	London Borough
LDV	Light Duty Vehicles (<3.5 tonnes)
LEZ	Low Emission Zone
LGV	Light Goods Vehicle
µg/m^3	Microgrammes per cubic metre
MCPD	Medium Combustion Plant Directive
MW_{th}	Megawatts Thermal
NAEI	National Atmospheric Emissions Inventory
NO	Nitric oxide
NO_2	Nitrogen dioxide
NOx	Nitrogen oxides (taken to be NO_2 + NO)
NPPF	National Planning Policy Framework
NRMM	Non-road Mobile Machinery
OEP	Office for Environmental Protection
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
OLEV	Office for Low Emission Vehicles
PAN	Planning Advice Note
PHV	Private Hire Vehicle
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

RDE	Real Driving Emissions
SCR	Selective Catalytic Reduction
SPG	Supplementary Planning Guidance
SPD	Supplementary Planning Document
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
TEB	Transport Emissions Benchmark
TEMPro	Trip End Model Presentation Program
TfL	Transport for London
TRAVL	Trip Rate Assessment Valid for London
ULEZ	Ultra Low Emission Zone
WHO	World Health Organisation
ZEC	Zero Emission Capable

15 Appendices

A1 London-Specific Policies and Measures

London Plan

Design-led Approach

A1.1 Policy D3 on optimising site capacity through the design-led approach states that *"development proposals should…help prevent or mitigate the impacts of noise and poor air quality"*. The explanatory text around this Policy states the following:

"Measures to design out exposure to poor air quality and noise from both external and internal sources should be integral to development proposals and be considered early in the design process. Characteristics that increase pollutant or noise levels, such as poorly-located emission sources, street canyons and noise sources should also be designed out wherever possible. Optimising site layout and building design can also reduce the risk of overheating as well as minimising carbon emissions by reducing energy demand".

Development Plans

A1.2 Policy SI 1 of the London Plan (GLA, 2021) 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.

Electric Vehicle Charging

A1.3 To support the uptake of zero tailpipe emission vehicles, Policy T6.1 of the London Plan states:

"All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces".

London Environment Strategy

A1.4 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"*

A1.5 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)

A1.6 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)

A1.7 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 A1.6.

A1.8 The ULEZ will covers the entire area within the North and South Circular roads, applying the emissions standards set out in Paragraph A1.7.

Other Measures

A1.9 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.

A1.10 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 Construction Dust Assessment Procedure

A2.1 The criteria developed by IAQM (2016), upon which the GLA's guidance is based, divide the activities on construction sites into four types to reflect their different potential impacts. These are:

- demolition;
- earthworks;
- construction; and
- trackout.

A2.2 The assessment procedure includes the four steps summarised below:

STEP 1: Screen the Need for a Detailed Assessment

A2.3 An assessment is required where there is a human receptor within 350 m of the boundary of the site and/or within 50 m of the route(s) used by construction vehicles on the public highway, up to 500 m from the site entrance(s), or where there is an ecological receptor within 50 m of the boundary of the site and/or within 50 m of the route(s) used by construction vehicles on the public highway, up to 500 m from the site entrance(s).

A2.4 Where the need for a more detailed assessment is screened out, it can be concluded that the level of risk is *negligible* and that any effects will be 'not significant'. No mitigation measures beyond those required by legislation will be required.

STEP 2: Assess the Risk of Dust Impacts

A2.5 A site is allocated to a risk category based on two factors:

- the scale and nature of the works, which determines the potential dust emission magnitude (Step 2A); and
- the sensitivity of the area to dust effects (Step 2B).

A2.6 These two factors are combined in Step 2C, which is to determine the risk of dust impacts with no mitigation applied. The risk categories assigned to the site may be different for each of the four potential sources of dust (demolition, earthworks, construction and trackout).

Step 2A – Define the Potential Dust Emission Magnitude

A2.7 Dust emission magnitude is defined as either 'Small', 'Medium', or 'Large'. The IAQM guidance explains that this classification should be based on professional judgement, but provides the examples in Table A2.1.

Table A2.1: Examples of How the Dust Emission Magnitude Class May be Defined

Class	Examples
Demolition	
Large	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
Medium	Total building volume 20,000 m^3 – 50,000 m^3, potentially dusty construction material, demolition activities 10-20 m above ground level
Small	Total building volume <20,000 m^3, construction material with low potential for dust release (e.g. metal cladding or timber), demolition activities <10 m above ground, demolition during wetter months
Earthworks	
Large	Total site area >10,000 m^2, potentially dusty soil type (e.g. clay, which will be prone to suspension when dry to due 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
Medium	Total site area 2,500 m^2 – 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
Small	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 <20,000 tonnes, earthworks during wetter months
Construction	
Large	Total building volume >100,000 m^3, piling, on site concrete batching; sandblasting
Medium	Total building volume 25,000 m^3 – 100,000 m^3, potentially dusty construction material (e.g. concrete), piling, on site concrete batching
Small	Total building volume <25,000 m^3, construction material with low potential for dust release (e.g. metal cladding or timber)
Trackout [a]	
Large	>50 HDV (>3.5t) outward movements in any one day, potentially dusty surface material (e.g. high clay content), unpaved road length >100 m
Medium	10-50 HDV (>3.5t) outward movements in any one day, moderately dusty surface material (e.g. high clay content), unpaved road length 50 m – 100 m
Small	<10 HDV (>3.5t) outward movements in any one day, surface material with low potential for dust release, unpaved road length <50 m

[a] These numbers are for vehicles that leave the site after moving over unpaved ground.

Step 2B – Define the Sensitivity of the Area

A2.8 The sensitivity of the area is defined taking account of a number of factors:

- the specific sensitivities of receptors in the area;
- the proximity and number of those receptors;
- in the case of PM_{10}, the local background concentration; and
- site-specific factors, such as whether there are natural shelters to reduce the risk of wind-blown dust.

A2.9 The first requirement is to determine the specific sensitivities of local receptors. The IAQM guidance recommends that this should be based on professional judgment, taking account of the principles in Table A2.2. These receptor sensitivities are then used in the matrices set out in Table A2.3, Table A2.4 and Table A2.5 to determine the sensitivity of the area. Finally, the sensitivity of the area is considered in relation to any other site-specific factors, such as the presence of natural shelters etc., and any required adjustments to the defined sensitivities are made.

Step 2C – Define the Risk of Impacts

A2.10 The dust emission magnitude determined at Step 2A is combined with the sensitivity of the area determined at Step 2B to determine the *risk* of impacts with no mitigation applied. The IAQM guidance provides the matrix in Table A2.6 as a method of assigning the level of risk for each activity.

STEP 3: Determine Site-specific Mitigation Requirements

A2.11 The IAQM guidance provides a suite of recommended and desirable mitigation measures which are organised according to whether the outcome of Step 2 indicates a low, medium, or high risk. The list provided in the IAQM guidance has been used as the basis for the requirements set out in Appendix A3.

STEP 4: Determine Significant Effects

A2.12 The IAQM guidance does not provide a method for assessing the significance of effects before mitigation, and advises that pre-mitigation significance should not be determined. With appropriate mitigation in place, the IAQM guidance is clear that the residual effect will normally be 'not significant'.

A2.13 The IAQM guidance recognises that, even with a rigorous dust management plan in place, it is not possible to guarantee that the dust mitigation measures will be effective all of the time, for instance under adverse weather conditions. The local community may therefore experience occasional, short-term dust annoyance. The scale of this would not normally be considered sufficient to change the conclusion that the effects will be 'not significant'.

Table A2.2: Principles to be Used When Defining Receptor Sensitivities

Class	Principles	Examples
Sensitivities of People to Dust Soiling Effects		
High	users can reasonably expect enjoyment of a high level of amenity; or the appearance, aesthetics or value of their property would be diminished by soiling; and the people or property would reasonably be expected to be present continuously, or at least regularly for extended periods, as part of the normal pattern of use of the land	dwellings, museum and other culturally important collections, medium and long term car parks and car showrooms
Medium	users would expect to enjoy a reasonable level of amenity, but would not reasonably expect to enjoy the same level of amenity as in their home; or the appearance, aesthetics or value of their property could be diminished by soiling; or the people or property wouldn't reasonably be expected to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land	parks and places of work
Low	the enjoyment of amenity would not reasonably be expected; or there is property that would not reasonably be expected to be diminished in appearance, aesthetics or value by soiling; or there is transient exposure, where the people or property would reasonably be expected to be present only for limited periods of time as part of the normal pattern of use of the land	playing fields, farmland (unless commercially-sensitive horticultural), footpaths, short term car parks and roads
Sensitivities of People to the Health Effects of PM_{10}		
High	locations where members of the public may be exposed for eight hours or more in a day	residential properties, hospitals, schools and residential care homes
Medium	locations where the people exposed are workers, and where individuals may be exposed for eight hours or more in a day.	may include office and shop workers, but will generally not include workers occupationally exposed to PM_{10}
Low	locations where human exposure is transient	public footpaths, playing fields, parks and shopping streets
Sensitivities of Receptors to Ecological Effects		
High	locations with an international or national designation and the designated features may be affected by dust soiling; or locations where there is a community of a particularly dust sensitive species	Special Areas of Conservation with dust sensitive features
Medium	locations where there is a particularly important plant species, where its dust sensitivity is uncertain or unknown; or locations with a national designation where the features may be affected by dust deposition	Sites of Special Scientific Interest with dust sensitive features
Low	locations with a local designation where the features may be affected by dust deposition	Local Nature Reserves with dust sensitive features

Table A2.3: Sensitivity of the Area to Dust Soiling Effects on People and Property [7]

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

[7] For demolition, earthworks and construction, distances are taken either from the dust source or from the boundary of the site. For trackout, distances are measured from the sides of roads used by construction traffic. Without mitigation, trackout may occur from roads up to 500 m from sites with a *large* dust emission magnitude for trackout, 200 m from sites with a *medium* dust emission magnitude and 50 m from sites with a *small* dust emission magnitude, as measured from the site exit. The impact declines with distance from the site, and it is only necessary to consider trackout impacts up to 50 m from the edge of the road.

Table A2.4: Sensitivity of the Area to Human Health Effects [7]

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

Table A2.5: Sensitivity of the Area to Ecological Effects [7]

Receptor Sensitivity	Distance from the Source (m)	
	<20	<50
High	High	Medium
Medium	Medium	Low
Low	Low	Low

Table A2.6: Defining the Risk of Dust Impacts

Sensitivity of the Area	Dust Emission Magnitude		
	Large	Medium	Small
Demolition			
High	High Risk	Medium Risk	Medium Risk
Medium	High Risk	Medium Risk	Low Risk
Low	Medium 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
Trackout			
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Low Risk	Negligible
Low	Low Risk	Low Risk	Negligible

A3 EPUK & IAQM Planning for Air Quality Guidance

A3.1 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

A3.2 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".

A3.3 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.

A3.4 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.

A3.5 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".

A3.6 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

A3.7 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.

A3.8 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.

A3.9 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.

A3.10 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.

A3.11 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".

A3.12 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".

A3.13 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".

A3.14 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

A3.15 There is no official guidance in the UK in relation to development control on how to describe the nature of air quality impacts, nor how to assess their significance. The approach within the EPUK/IAQM guidance has, therefore, been used in this assessment. This approach involves a two stage process:

- a qualitative or quantitative description of the impacts on local air quality arising from the development; and
- a judgement on the overall significance of the effects of any impacts.

A3.16 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.

A3.17 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.

A3.18 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 A4.

A4 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.

Lucy Hodgins, BSc (Hons) CSci MIEnvSc MIAQM

Miss Hodgins is a Principal Consultant with AQC with over ten years' experience in the field of air quality. She has extensive experience in the assessment of air quality impacts for a range of industrial, commercial and residential projects, using qualitative and quantitative methods to assess road traffic and point source emissions utilising a variety of models, including ADMS-Roads, Breeze Roads, ADMS-5 and Breeze Aermod. She has prepared assessments for energy from waste, anaerobic digestion and waste biomass facilities for a range of air pollutants, along with nuisance dust and odour assessments. Lucy has also been involved in air quality management and assessment work for local authorities, including air quality modelling for Clean Air Zones as well as microsimulation modelling for junction improvement schemes. She has also undertaken numerous operational dust assessments for mineral and waste facilities, as well as assessments of construction dust emissions. She is a Chartered Scientist and a Member of the Institute of Air Quality Management and the Institution of Environmental Sciences.

Julia Burnell, MEnvSci (Hons) MIEnvSc MIAQM

Miss Burnell is a Senior Consultant with AQC with over six years' experience in the field of air quality. She has experience of undertaking a range of air quality assessments for power, transportation, and mixed-use development projects both in the UK and internationally. She is also experienced at preparing environmental permit applications for medium combustion plant/specified generator sites and has commissioned and maintained numerous ambient air quality monitoring surveys. Prior to her work with AQC, Julia completed an MEnvSci (Hons) in Environmental Science (four-year integrated master's). She is a Member of both the Institute of Air Quality Management and the Institution of Environmental Sciences.

A5 Modelling Methodology

Model Inputs

A5.1 Predictions have been carried out using the ADMS-Roads dispersion model (v5). The model requires the user to provide various input data, including emissions from each section of road and the road characteristics (including road width, street canyon width, street canyon height and porosity, where applicable). Vehicle emissions have been calculated based on vehicle flow, composition and speed data using the EFT (Version 11.0) published by Defra (2022d). Model input parameters are summarised in Table A5.1 and, where considered necessary, discussed further below.

Table A5.1: Summary of Model Inputs

Model Parameter	Value Used
Terrain Effects Modelled?	No
Variable Surface Roughness File Used?	No
Urban Canopy Flow Used?	No
Advanced Street Canyons Modelled?	Yes
Noise Barriers Modelled?	No
Meteorological Monitoring Site	London City
Meteorological Data Year	2022
Dispersion Site Surface Roughness Length (m)	1
Dispersion Site Minimum MO Length (m)	50
Met Site Surface Roughness Length (m)	0.5
Met Site Minimum MO Length (m)	30
Gradients?	No

A5.2 AADT flows, and the proportions of HDVs, for the model extent have been determined from the interactive web-based map provided by DfT (2022). The 2019 AADT flows have been factored forwards to the assessment year of 2022 using growth factors derived using the TEMPro System v7.2 (DfT, 2017). Traffic speeds have been based on those presented in the LAEI, with some having been adjusted based on professional judgement, taking account of the road layout, speed limits and the proximity to a junction. The traffic data used in this assessment are summarised in Table A5.2. Diurnal and monthly flow profiles for the traffic have been derived from the national profiles published by DfT (2020).

Table A5.2: Summary of Traffic Data used in the Assessment (AADT Flows) [a]

Road Link	2022		2025	
	AADT	%HDV	AADT	%HDV
A501 Euston Road/Grays Inn Road (N)	53626	8.5	55585	8.5
A501 Euston Road/Grays Inn Road (S)	24270	7.0	25157	7.0
A5200 Grays Inn Road (N)	13475	7.2	13967	7.2
A501 Acton Street	9142	9.1	9476	9.1
A5200 Grays Inn Road (S)	13475	7.2	13967	7.2
A501 Swinton Street	12164	4.3	12608	4.3
A501 Penton Rise	13385	4.8	13875	4.8
A201 Kings Cross Road to Swinton	8007	10.1	8300	10.1
A201 Kings Cross Road, Swinton to Acton	13234	6.2	13717	6.2
A201 Kings Cross Road, Acton Street to Roseberry Ave	15971	4.7	16555	4.7

[a] This is just a summary of the data entered into the model, which have been input as hourly average flows and HDV proportions, as well as diurnal and monthly flow profiles for these vehicles

A5.3 Figure A5.1 shows the road network included within the model, along with the speed at which each link was modelled, and shows which sections of road have been modelled as canyons.

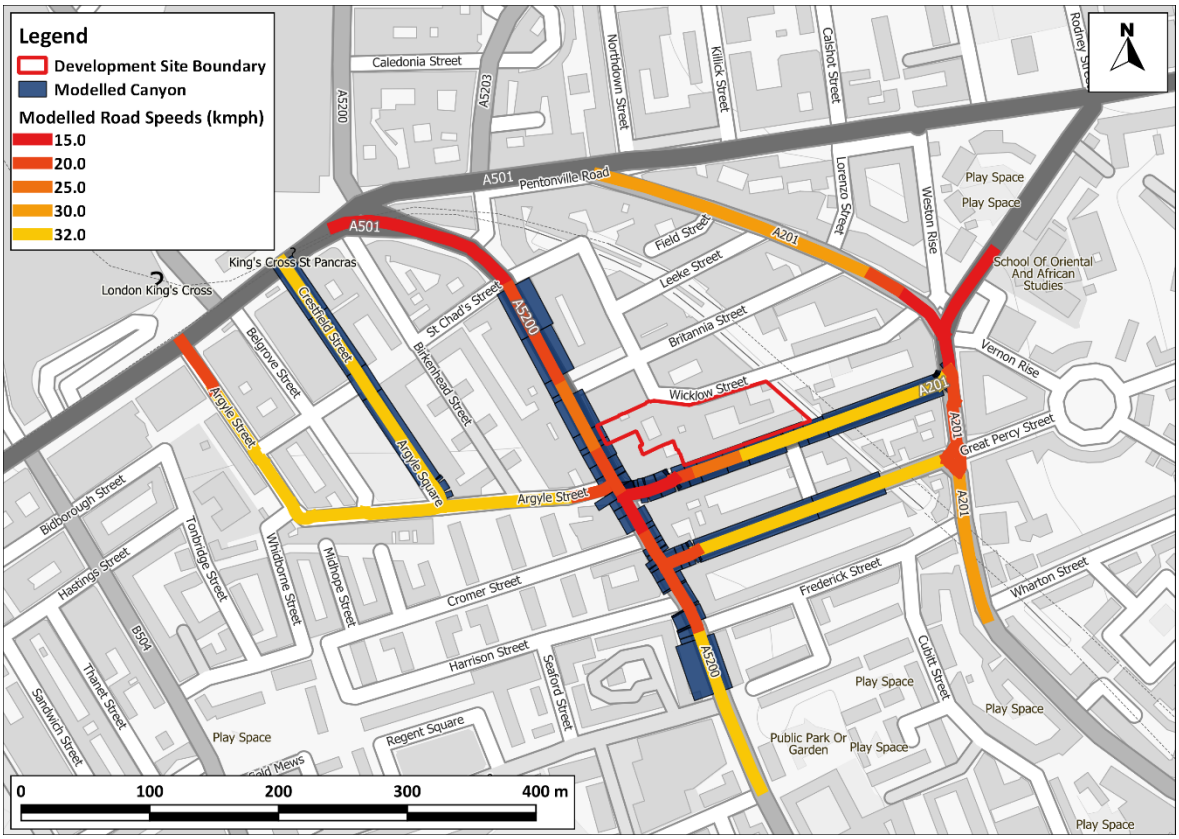

Figure A5.1: Modelled Road Network, Speeds & Street Canyons

A5.4 For the purposes of modelling, it has been assumed that the Swinton Street and Gray's Inn Road facades of the proposed development are within a street canyon formed by the buildings of each road. This road has a number of canyon-like features, which reduce dispersion of traffic emissions, and can lead to concentrations of pollutants being higher here than they would be in areas with greater dispersion. Swinton Street and Gray's Inn Road, as well as Acton Street and Argyle Square, have therefore been modelled as street canyons using ADMS-Roads' advanced canyon module, with appropriate input parameters determined from plans, on-site measurements, local mapping and photographs. The advanced canyon module has been used along with the urban canopy flow module, the input data for which have been published by Cambridge Environmental Research Consultants (CERC, 2016), who developed the ADMS models. The modelled canyons are shown in Figure A5.1.

A5.5 Hourly sequential meteorological data in sectors of 10 degrees from London City Airport for 2022 have been used in the model. The London City Airport meteorological monitoring station is located approximately 11.5 km to the east of the proposed development. Both the application site and the London City meteorological monitoring station are located in London where they will be influenced

by the effects of inland meteorology over urban topography. The topography of the model domain is similar to that around the meteorological monitoring station and measurements from this site are considered to provide the most robust basis to predict meteorology within the model domain. A wind rose for the site for the year 2022 is provided in Figure A5.2. The data for use in ADMS was provided by ADM ltd.

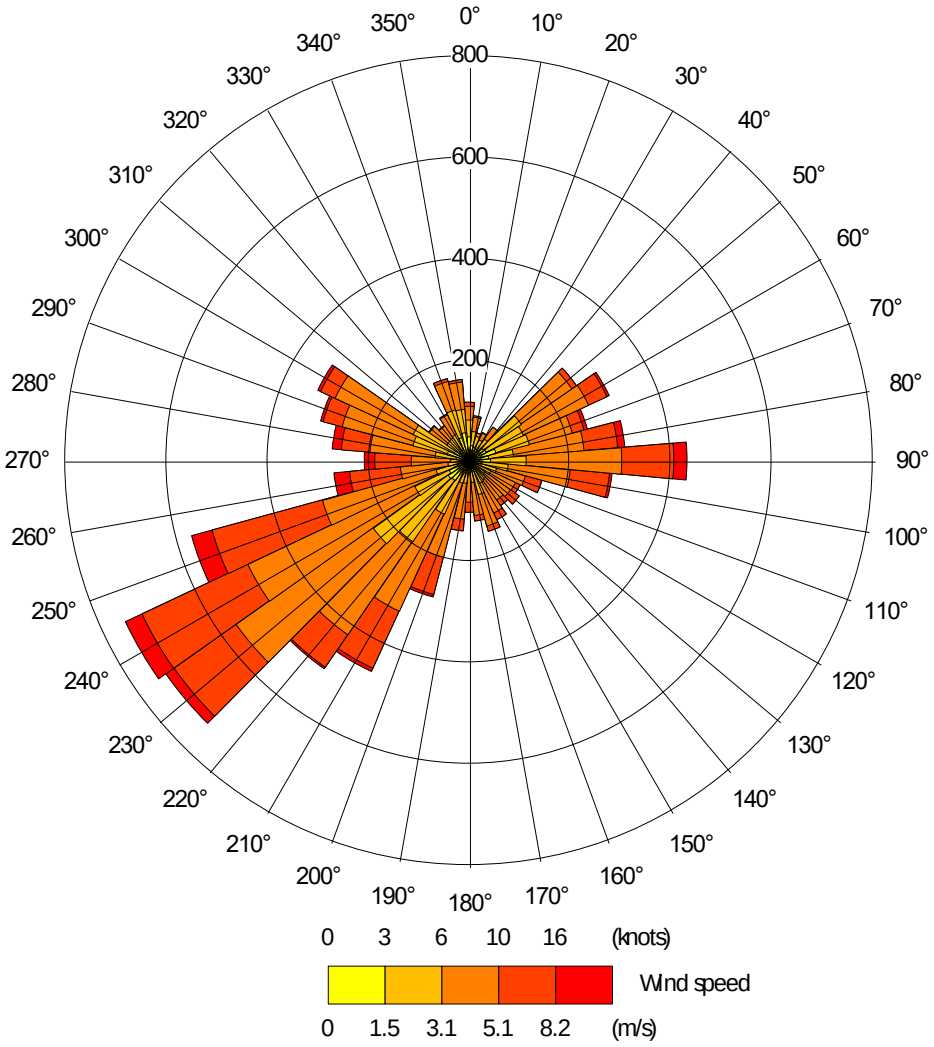

Figure A5.2: Wind Rose

Model Verification

A5.6 Evidence collected over many years has shown that, in most urban areas, dispersion modelling relying upon Defra's EFT has tended to systematically under-predict roadside nitrogen dioxide concentrations. To account for this, it is necessary to adjust the model against local measurements. The model has been run to predict annual mean NO_2 concentrations during 2019 at the GR1, GR2, GR4 and GR5 diffusion tube monitoring sites from the site specific monitoring survey. Site GR3 was omitted due to low data capture and GR7 was omitted due to unexpectedly low concentrations, likely

to be a result of localised conditions directly adjacent to the monitoring site. As a result of these omissions, the verification factor is greater. Therefore, the resulting concentrations predicted by the model may be considered worst-case.

A5.7 Most nitrogen dioxide (NO_2) is produced in the atmosphere by reaction of nitric oxide (NO) with ozone. It is therefore most appropriate to verify the model in terms of primary pollutant emissions of nitrogen oxides (NOx = NO + NO_2).

A5.8 The model output of road-NOx (i.e. the component of total NOx coming from road traffic) has been compared with the 'measured' road-NOx. Measured road-NOx has been calculated from the measured NO_2 concentrations and the predicted background NO_2 concentration using the NOx from NO_2 calculator (Version 8.1) available on the Defra LAQM Support website (Defra, 2022d).

A5.9 The unadjusted model has under predicted the road-NOx contribution; this is a common experience with this and most other road traffic emissions dispersion models. An adjustment factor has been determined as the slope of the best-fit line between the 'measured' road contribution and the model derived road contribution, forced through zero (Figure A5.3). The calculated adjustment factor of 1.08 has been applied to the modelled road-NOx concentration for each receptor to provide adjusted modelled road-NOx concentrations.

A5.10 The total nitrogen dioxide concentrations have then been determined by combining the adjusted modelled road-NOx concentrations with the predicted background NO_2 concentration within the NOx to NO_2 calculator. Figure A5.4 compares final adjusted modelled total NO_2 at each of the monitoring sites to measured total NO_2, and shows a close agreement.

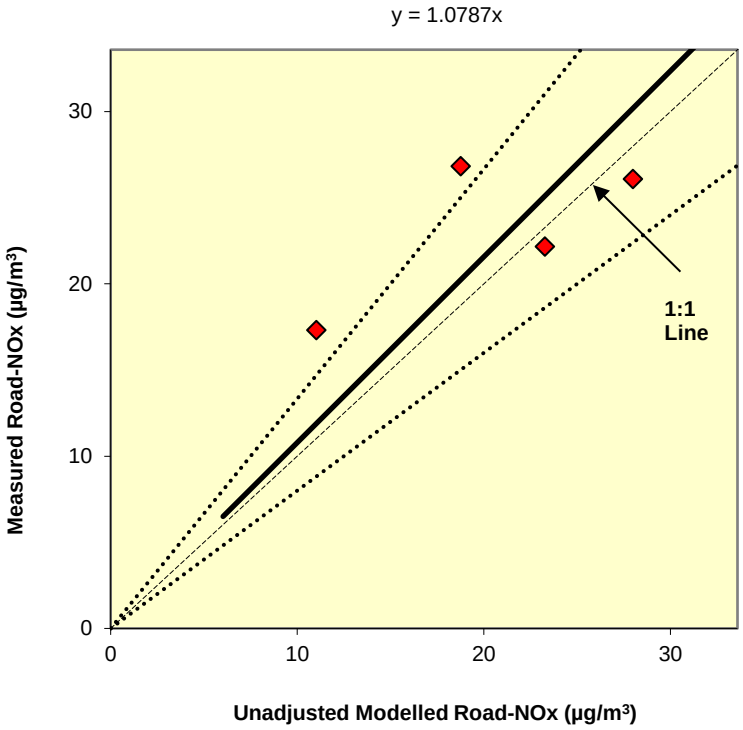

Figure A5.3: Comparison of Measured Road NOx to Unadjusted Modelled Road NOx Concentrations. The dashed lines show ± 25%.

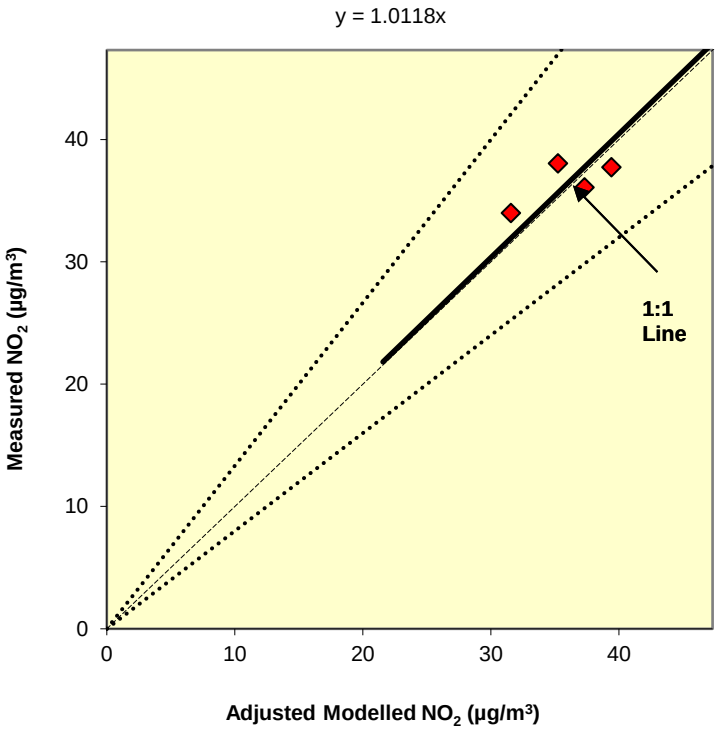

Figure A5.4: Comparison of Measured Total NO_2 to Final Adjusted Modelled Total NO_2 Concentrations. The dashed lines show ± 25%.

5.10.1 Table A5.3 shows the statistical parameters relating to the performance of the model, as well as the 'ideal' values (Defra, 2022e). The values calculated for the model demonstrate that it is performing well.

Table A5.3: Statistical Model Performance

Statistical Parameter	Model-Specific Value	'Ideal' Value
Correlation Coefficient [a]	0.73	**1**
Root Mean Square Error (RMSE) [b]	2.12	**0**
Fractional Bias [c]	0.02	**0**

[a] Used to measure the linear relationship between predicted and observed data. A value of zero means no relationship and a value of 1 means absolute relationship.

[b] Used to define the average error or uncertainty of the model. The units of RMSE are the same as the quantities compared (i.e. µg/m^3). TG22 (Defra, 2022e) outlines that, ideally, a RMSE value within 10% of the air quality objective (4µg/m^3) would be derived. If RMSE values are higher than 25% of the objective (10 µg/m^3) it is recommended that the model is revisited.

[c] Used to identify if the model shows a systematic tendency to over or under predict. Negative values suggest a model over-prediction and positive values suggest a model under-prediction.

PM_{10} and $PM_{2.5}$

A5.11 The approach described above for NOx and nitrogen dioxide determines the road increment of concentrations by subtracting the predicted local background from the roadside measurements. This works well for NOx because the differences between roadside and background concentrations typically represent a large proportion of the total measured value. The same is not true for PM_{10} and $PM_{2.5}$ concentrations, which are dominated by non-road emissions, even at the roadside. In practice, the influence of a local road on concentrations can often be smaller than the uncertainty in the mapped background concentration. As an example of this, 31% of all roadside and kerbside sites in London which measured $PM_{2.5}$ in 2019 with >75% data capture, recorded an annual mean concentration lower than the equivalent Defra mapped background value. Using measured background concentrations does not provide any significant benefit, owing largely to the spatial resolution of available measurements, but also because of measurement uncertainty. For example, hourly-mean $PM_{2.5}$ concentrations measured at roadside sites are often lower than those measured at nearby urban background sites, while concentrations at urban background sites are often lower than those measured at rural sites.

A5.12 For these reasons, it is not appropriate to calculate the annual mean road-increment to PM_{10} and $PM_{2.5}$ concentrations by subtracting either the mapped background or a local measured background concentration. This, in turn, means that the approach to model adjustment which is described for NOx and NO_2 is not appropriate for PM_{10} and $PM_{2.5}$. Historically, many studies have derived a model adjustment factor for NOx and applied this to PM_{10} and $PM_{2.5}$. This is also not appropriate, since there is no reason to expect the same bias in emissions of NOx, PM_{10} and $PM_{2.5}$.

A5.13 While there is very strong evidence that EFT-based models have consistently under-predicted road-NOx concentrations in urban areas, there is no equivalent evidence for PM_{10} and $PM_{2.5}$. There is currently no strong basis for applying any adjustment to the model outputs. Predicted concentrations of PM_{10} and $PM_{2.5}$ have thus not been adjusted.

Post-processing

A5.14 The model predicts road-NOx concentrations at each receptor location. These concentrations have been adjusted using the adjustment factor set out above, which, along with the background NO_2, has been processed through the NOx to NO_2 calculator available on the Defra LAQM Support website (Defra, 2022d). The traffic mix within the calculator has been set to "All London UK traffic", which is considered suitable for the study area. The calculator predicts the component of NO_2 based on the adjusted road-NOx and the background NO_2.

A6 Modelling Results Compared Against Camden Criteria

A6.1 The following section provides modelling results compared against the Camden CPG Criteria which are based on previous WHO Guidelines. Only the results for the residential area of the proposed development have been presented as the WHO guidelines are annual means and therefore would not apply at the hotel or office areas of the proposed development (see Paragraph 5.7).

A6.2 The results show that at all locations, annual mean NO_2 and PM_{10} concentrations are below the respective criteria, even when using highly conservative modelling assumptions. However, for both scenarios, $PM_{2.5}$ concentrations are above the criteria. The implications of this are discussed further in Paragraphs 10.13 to 10.18.

Table A6.1: Predicted Annual Mean Concentrations of Nitrogen Dioxide (NO_2), PM_{10} and $PM_{2.5}$ for New Residential Receptors in the Proposed Development ($\mu g/m^3$)[a]

Receptor		2025			2022 (assuming no future reduction in concentrations)		
		NO_2	PM_{10}	$PM_{2.5}$	NO_2	PM_{10}	$PM_{2.5}$
Basement							
1	Resi – South, Swinton Street	34.4	19.9	12.5	37.7	20.6	13.1
2	Resi – South, Swinton Street	26.0	18.9	11.9	27.9	19.5	12.4
3	Resi – South, Swinton Street	26.6	18.9	12.0	28.5	19.6	12.4
4	Resi – South, Swinton Street	30.5	19.4	12.2	33.2	20.1	12.7
5	Resi – South, Swinton Street	31.9	19.6	12.3	34.8	20.3	12.9
6	Resi - South	28.7	19.2	12.1	31.0	19.9	12.6
7	Resi – South, Courtyard	27.4	19.0	12.0	29.5	19.7	12.5
8	Resi – South, Courtyard	27.3	19.0	12.0	29.4	19.7	12.5
9	Resi – South, Courtyard	26.1	18.9	11.9	27.9	19.5	12.4
10	Resi – South, Courtyard	25.8	18.8	11.9	27.6	19.5	12.4
11	Resi – South, Courtyard	25.8	18.8	11.9	27.6	19.5	12.4
Ground							
1	Resi – South, Swinton Street	34.2	19.9	12.5	37.6	20.6	13.0
2	Resi – South, Swinton Street	26.0	18.9	11.9	27.8	19.5	12.4
3	Resi – South, Swinton Street	26.5	18.9	12.0	28.4	19.6	12.4
4	Resi – South, Swinton Street	29.5	19.3	12.2	32.0	20.0	12.7
5	Resi – South, Swinton Street	31.5	19.5	12.3	34.4	20.2	12.8
12	Resi – North, Wicklow Street	25.5	18.8	11.9	27.3	19.5	12.4
13	Resi – North, Wicklow Street	25.4	18.8	11.9	27.1	19.5	12.3
14	Resi – North, Wicklow Street	25.4	18.8	11.9	27.1	19.4	12.3
1st Floor							
1	Resi – South, Swinton Street	33.1	19.7	12.4	36.2	20.5	13.0
2	Resi – South, Swinton Street	25.9	18.8	11.9	27.7	19.5	12.4
3	Resi – South, Swinton Street	26.2	18.9	11.9	28.1	19.6	12.4
4	Resi – South, Swinton Street	28.0	19.1	12.1	30.3	19.8	12.6
5	Resi – South, Swinton Street	29.5	19.3	12.2	31.9	20.0	12.7
3rd Floor							
1	Resi – South, Swinton Street	31.3	19.5	12.3	34.1	20.2	12.8
2	Resi – South, Swinton Street	26.2	18.9	11.9	28.1	19.6	12.4
3	Resi – South, Swinton Street	26.4	18.9	11.9	28.3	19.6	12.4
4	Resi – South, Swinton Street	26.4	18.9	11.9	28.3	19.6	12.4
5	Resi – South, Swinton Street	27.6	19.0	12.0	29.7	19.7	12.5
WHO guideline		**38[b]**	**20**	**10[c]**	**38[b]**	**20**	**10[c]**

[a] Exceedances of the WHO Guideline are in bold

[b] While the WHO guideline is 40 µg/m^3, 38 µg/m^3 has been used in accordance with the Air Quality CPG which states that "*consideration must be paid to uncertainty in NO_2 data, therefore 38µg/m^3 (the 40µg/m^3 WHO limit less 5%) shall be taken as the limit for this pollutant*".

[c] 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.

A7 London Vehicle Fleet Projections

A7.1 TfL has published an Integrated Impact Assessment (Jacobs, 2017) setting out the impacts of the changes to the LEZ and ULEZ described in Paragraphs A1.6 and A1.8. The assessment predicts that the changes will reduce overall NOx emissions from vehicles in London by 28% in 2021 (32% in Inner London and 27% in Outer London) and by 21% in 2025 (24% in Inner London and 21% in Outer London). The percentage reduction reduces with time due to the natural turnover of the fleet that would have occurred regardless of the introduction of the proposed changes. The proposed changes will not significantly affect emissions in Central London, where the ULEZ will already be implemented, but concentrations here will still reduce due to the lower emissions in surrounding areas.

A7.2 The report projects that the changes will reduce exposure to exceedances of the annual mean nitrogen dioxide objective by 40% and 21% in Central London in 2021 and 2025, respectively; by 4% and 0% in Inner London in 2021 and 2025, respectively; and by 23% and 27% in Outer London in 2021 and 2025, respectively, when compared to the baseline scenario.

A7.3 The changes are not projected to have a significant effect on PM_{10} and $PM_{2.5}$ concentrations, although a small reduction is predicted.

A7.4 AQC's report on the performance of Defra's EFT (AQC, 2020b) also highlighted that the EFT's assumptions regarding future fleet composition in London and across the UK may be over-pessimistic in terms of NOx emissions (and no changes to the fleet mix within London were made between versions 9 and 10 of the EFT). The future fleet projection derived from the EFT for Outer London, for example, shows a very small reduction in the proportion of diesel cars between 2016 and 2030, and a very limited uptake of electric cars. The AQC report highlights that this contrasts with the expectations of many observers, as well as the most recent trends publicised by the media. When considered alongside the future requirements of the LEZ and ULEZ, these future fleet projections seem all the more unrealistic (i.e. worst-case in terms of emissions), as the changes to the LEZ and ULEZ would reasonably be expected to significantly increase the uptake of lower emissions vehicles in London.

A7.5 As outlined in Paragraph 5.27, the changes to the LEZ and ULEZ announced by the Mayor of London in June 2018 are not reflected in Defra's latest EFT and thus have not been considered in this assessment. The potentially over-pessimistic fleet projections built in to the EFT have not been addressed in this report either. Paragraphs A7.1 and A7.2 highlight that the changes to the LEZ and ULEZ will result in significant reductions in vehicle nitrogen oxides emissions and resultant nitrogen dioxide concentrations. The changes might reasonably also be expected to expedite the uptake of cleaner vehicles well beyond that projected in the EFT's fleet projections for London. As such, while the results presented in this report represent a reasonably conservative reflection of likely concentrations and impacts in the absence of the changes to the LEZ and ULEZ, they almost

certainly represent an unrealistically worst-case assessment of likely concentrations and impacts bearing in mind the implementation of these changes.

A8 'Air Quality Neutral'

A8.1 The GLA's consultation draft of London Plan Guidance; Air Quality Neutral (GLA, 2021) provides an approach to assessing whether a development is air quality neutral. The approach is to compare the expected emissions from the building's energy use and vehicle trips against defined benchmarks for buildings and transport in London.

A8.2 The benchmarks for heating and energy plant (termed 'Building Emissions Benchmarks' or 'BEBs') are set out in Table A8.1, while the 'Transport Emissions Benchmarks' ('TEBs') are set out in Table A8.2.

A8.3 The average trip length and average emission per vehicle are required if there is a need to calculate offset payments. The values given by GLA are set out in Table A8.3 and Table A8.4 respectively.

Table A8.1: Building Emissions Benchmark NO_x Emission Rates ($gNO_x/m^2/annum$) [a]

Land Use [b]	Individual Gas Boilers	Gas Boiler Network	CHP + Gas Boiler Network	Heat Pumps + Gas Boiler Network
Residential (including student accommodation and large-scale purpose-built shared living development)	3.5	5.7	7.8	5.7
Retail	0.53	0.97	4.31	0.97
Restaurants and bars	1.76	3.23	14.34	3.23
Offices	1.43	2.62	11.68	2.62
Industrial	1.07	1.95	8.73	1.95
Storage and distribution	0.55	1.01	4.5	1.01
Hotel	9.47	15.42	38.16	15.42
Care homes and hospitals	9.15	14.9	36.86	14.9
Schools, nurseries, doctors' surgeries, other non-residential institutions	0.9	1.66	7.39	1.66
Assembly and leisure	2.62	4.84	21.53	4.84

[a] Solid and liquid biomass appliances also emit fine particulate matter in addition to NO_x. The benchmark emission rate for particulate matter is zero.

[b] Separate use classes for commercial uses, including retail and offices, have now been replaced by use class E. If these separate uses are specified in the development proposal, they should be used for this assessment. Where the intended use is not specified, or where use class E has been specified, the benchmark for retail should be used.

Table A8.2: Benchmark Trip Rates

Land Use	Annual trips per	Benchmark Trip Rates		
		Central Activities Zone (CAZ)	Inner London (excluding CAZ)	Outer London
Residential (including student accommodation and large-scale purpose-built shared living development)	dwelling	68	114	447
Office / Light Industrial	m^2 (GIA)	2	1	16
Retail (Superstore)	m^2 (GIA)	39	73	216
Retail (Convenience)	m^2 (GIA)	18	139	274
Restaurant / Café	m^2 (GIA)	64	137	170
Drinking establishments	m^2 (GIA)	0.8	8	N/A
Hot food takeaway	m^2 (GIA)	N/A	32.4	590
Industrial	m^2 (GIA)	N/A	3.9	16.3
Storage and distribution	m^2 (GIA)	N/A	1.4	5.8
Hotels	m^2 (GIA)	1	1.4	6.9
Care homes and hospitals	m^2 (GIA)	N/A	1.1	19.5
Schools, nurseries, doctors' surgeries, other non-residential institutions	m^2 (GIA)	0.1	30.3	44.4
Assembly and leisure	m^2 (GIA)	3.6	10.5	47.2

Table A8.3: Emission factors per vehicle-km

Pollutant	Emission factors (g/veh-km)		
	Central Activities Zone (CAZ)	Inner London [a] (excluding CAZ)	Outer London [a]
NOx	0.48	0.39	0.35
$PM_{2.5}$	0.036	0.032	0.028

[a] Inner London and Outer London as defined in the LAEI (GLA, 2019).

Table A8.4: Average Distance Travelled by Car per Trip

Land use	Distance (km)		
	Central Activity Zone	Inner	Outer
Residential	4.2	3.4	11.4
Office	3.0	7.2	10.8
Retail	9.2	5.5	5.4

A9 Adjustment of Short-Term Data to Annual Mean

A9.1 A site-specific diffusion tube monitoring survey was undertaken at seven locations close to the proposed development site, some of which were triplicate sites. The survey was undertaken from July 2019 to January 2020 and therefore do not represent a full calendar year. Therefore, the data have been annualised to a 2022 annual mean equivalent based on the ratio of concentrations during the short-term monitoring period to those over the 2022 calendar year at four background sites operated as part of the Automatic Urban and Rural Network (AURN) where long-term data are available. This follows the guidance set out in Box 7.9 of LAQM.TG22.

A9.2 The annual mean nitrogen dioxide concentrations and the period means for each of the four automatic monitoring sites for each diffusion tube site are presented. The adjustment factors for each automatic monitor and calculated average factor for each diffusion tube site are presented in Table A9.1.

Table A9.1: Data used to Adjust Short-term Monitoring Data to 2022 Annual Mean Equivalent

Automatic Monitoring Site	Period Mean Concentration (µg/m^3)		Adjustment Factor	Overall Factor
	2022 Calendar year	June 2019 - January 2020 [a]		
G1				
London Bloomsbury	24.0	28.4	0.848	0.785
London Haringey	17.0	20.9	0.817	
London N. Kensington	18.4	25.7	0.717	
London Westminster	23.5	30.9	0.760	
G2 and G7c				
London Bloomsbury	24.0	30.5	0.787	0.729
London Haringey	17.0	22.5	0.758	
London N. Kensington	18.4	27.9	0.661	
London Westminster	23.5	33.1	0.710	
G3				
London Bloomsbury	24.0	19.8	1.213	1.127
London Haringey	17.0	14.1	1.211	
London N. Kensington	18.4	18.2	1.016	
London Westminster	23.5	22.0	1.068	
G4a				
London Bloomsbury	24.0	29.4	0.817	0.762
London Haringey	17.0	21.9	0.777	
London N. Kensington	18.4	26.1	0.708	
London Westminster	23.5	31.5	0.744	
G4b/c				
London Bloomsbury	24.0	27.9	0.861	0.802
London Haringey	17.0	20.6	0.828	
London N. Kensington	18.4	25.1	0.735	
London Westminster	23.5	29.9	0.783	
G5, G6, G7a and G7b				
London Bloomsbury	24.0	28.4	0.848	0.785
London Haringey	17.0	20.9	0.817	
London N. Kensington	18.4	25.7	0.717	
London Westminster	23.5	30.9	0.760	

[a] Specifically 3 June 2019 to 8 January 2020. [b] Some of the diffusion tube sites were triplicates and had different period means due to loss of diffusion tubes and access to the building. These triplicates are denoted by a, b and c. All tubes have been annualised separately.

A10 Site Specific Monitoring Location Photos

A10.1 Photographs of the diffusion tube monitoring sites are shown below.

Figure A10.1: Diffusion Tube Monitoring Location for GR1 on Gray's Inn Road (outside window)

Figure A10.2: Diffusion Tube Monitoring Location for GR2 on Gray's Inn Road

Figure A10.3: Diffusion Tube Monitoring Location for GR3 on Swinton Street (on window ledge)

Figure A10.4: Diffusion Tube Monitoring Location for GR4 on Swinton Street

Figure A10.5: Diffusion Tube Monitoring Location for GR5 on Swinton Street

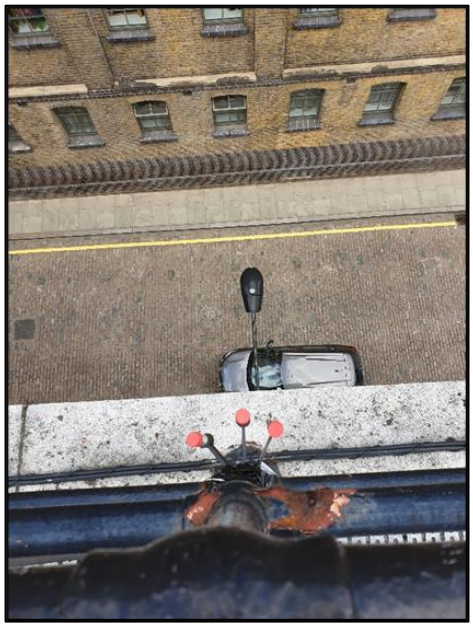

Figure A10.6: Diffusion Tube Monitoring Location for GR6 on Roof on Wicklow Street

Figure A10.7: Diffusion Tube Monitoring Location for GR7 on Wicklow Street

A11 Construction Mitigation

A11.1 Table A11.1 presents 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.

A11.2 Note, the best-practice measures from the GLA guidance related to haul routes have not been included as the site is small with no haul routes and therefore these are not applicable.

Table A11.1: Best-Practice Mitigation Measures Recommended for the Works

Measure	Desirable	Highly Recommended
Site Management		
Develop and implement a stakeholder communications plan that includes community engagement before work commences on site		✓
Develop a Dust Management Plan (DMP)		✓
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		✓
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		✓
Hold regular liaison meetings with other high risk construction sites within 500 m of the site boundary, to ensure plans are co-ordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the off-site transport/deliveries which might be using the same strategic road network routes		✓
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		✓
Install green walls, screens or other green infrastructure to minimise the impact of dust and pollution	✓	
Avoid site runoff of water or mud		✓
Keep site fencing, barriers and scaffolding clean using wet methods		✓
Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below		✓
Cover, seed, or fence stockpiles to prevent wind whipping		✓
Carry out regular dust soiling checks of buildings within 100 m of site boundary and provide cleaning if necessary		✓
Provide showers and ensure a change of shoes and clothes are required before going off-site to reduce transport of dust	✓	
Put in place real-time dust and air quality pollutant monitors across the site and ensure they are checked regularly		✓
Agree monitoring locations with the Local Authority		✓
Where possible, commence baseline monitoring at least three months before work begins		✓
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 London's NRMM emission standards. Currently, NRMM used on any site within Greater London are required to meet Stage IIIB of EU Directive 97/68/EC (The European Parliament and the Council of the European Union, 1997) and its subsequent amendments as a minimum, while NRMM used on any site within the Central Activity Zone, Canary Wharf or one of London's Opportunity Areas are required to meet Stage IV of the Directive as a minimum. From January 2025, NRMM used anywhere in London will be required to meet stage IV, while from January 2030 the stage V standard will apply. From January 2040 only zero emission machinery will be allowed.		✓
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		✓
Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials		✓
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 non-potable water where possible and appropriate		✓
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		✓
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		✓
Bag and remove any biological debris or damp down such material before demolition		✓
Measures Specific to Earthworks		
Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable		✓
Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable		✓
Only remove the cover from small areas during work, not all at once		✓
Measures Specific to Construction		
Avoid scabbling (roughening of concrete surfaces), if possible		✓
Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place		✓
Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery		✓
For smaller supplies of fine powder materials ensure bags are sealed after use and stored appropriately to prevent dust	✓	
Measures Specific to Trackout		
Regularly use a water-assisted dust sweeper on the access and local roads, as necessary, to remove any material tracked out of the site		✓
Avoid dry sweeping of large areas		✓
Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport		✓

Access gates should be located at least 10 m from receptors, where possible		✓
Apply dust suppressants to locations where a large volume of vehicles enter and exit the construction site	✓	