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Air Quality Memo: GLA Consultation

Case details

	Stage 1	Stage 2	
Date of first review:	18/03/2024	Date of first review:	
Case Name:	100 Chalk Farm Road	Case Name:	
Case Number:	2024/0108	Case Number:	
Case Officer:	[redacted]	Case Officer:	
London Borough:	LB Camden	London Borough:	LB Camden
Application Type (Outline/Hybrid/Detailed):	Outline	Application Type (Outline/Hybrid/Detailed):	Outline
Applicant:	Regal Chalk Farm Limited	Applicant:	
AQ Consultant:	Air Quality Consultants	AQ Consultant:	
Document Title:	100 Chalk Farm Road - Air Quality Assessm	Document Title:	
Document Date:	01/02/2024	Document Date:	

Development proposals

Use

Demolition of existing buildings and redevelopment of the site to provide two new buildings of between 6-12 storeys: one containing affordable homes (Class C3) and one (with three cylindrical volumes) containing purpose-built student accommodation with associated amenity and ancillary space (Sui Generis), a ground floor commercial space (Class E) together with public realm, access, plant installation, and other associated works.

Floorspace/Number of units

Compliance Schedule - To be completed by the GLA Air Quality Officer

SI 1 - Improving Air Quality

Policy	Policy Sub-Area	Required Data (In line with EAG)	Policy Compliance	GLA Comment Reference
A: Development Plans, through relevant strategic, site-specific and area- based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.			**Compliant**	
B: To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:	1. Development proposals should not:	a: lead to further deterioration of existing poor air quality	**Potential Compliance-Pending Information**	**4**
		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	**Compliant**	
		c: create unacceptable risk of high levels of exposure to poor air quality.	**Potential Compliance-Pending Information**	**4**
	2. In order to meet the requirements in Part 1, as a minimum:	a: development proposals must be at least Air Quality Neutral	**Compliant**	
		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	**Compliant**	
		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	**Compliant**	
		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.	**Compliant**	
C: Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:	1. how proposals have considered ways to maximise benefits to local air quality, and		**Not Applicable**	
	2. what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.		**Not Applicable**	
D: In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.			**Compliant**	
E: Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.			**Compliant**	

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Detailed Comments - Applicant MUST provide detailed responses to the below items

Comment No.	GLA Stage I Date: 18/03/24
Documents to be secured	
	100 Chalk Farm Road - Air Quality Assessment (01/02/2024)
General compliance comments	
1	London Plan Policy SI1 states that development proposals should not lead to deterioration of existing poor air quality; should not create any new areas that exceed air quality limits or delay compliance in areas that are in exceedance of legal limits; and should not create unacceptable risk of high levels of exposure to poor air quality. Development proposals must be at least Air Quality Neutral and large-scale development proposals should provide an air quality positive statement.
2	The proposed development will not lead to adverse impacts on local air quality and conditions for future residents/occupiers when assessed by AQS objective values. Therefore the development is considered to be compliant with London Plan Policy. However, PM2.5 concentrations are predicted to marginally exceed the GLA target of 10 ug/m3 in both opening year scenarios, and thus can be considered to lead to adverse impacts when assessed against the Camden Planning Guidance (CPG).
3	An Air Quality Assesment was provided with the application. Impacts from operational and construction traffic has been scoped out in accordance to EPUK guidance. Detailed modelling of site suitability has been undetaken. A detailed modelling assessment of pollutant concentrations was undertaken at 15 receptor locations within the development for the future opening year of 2027. Two 2027 scenarios have been modelled, a 2027 scenario and a 'no-improvement' scenario with no improvement in emission factors or background concentrations from the baseline year. Paragraphs 5.9-10 indicate Defra background concentrations have been adjusted in comparison to monitored data by a factor of 0.662. It is assumed these adjusted backgrounds are used when verifying and adjusting the model, and post processing of modelled concentrations. This seems to contradict paragraph 4.2 on page 24 which indicates the local authority has instructed the use of automatic monitoring or Defra mapped values depending on which is more conservative. The background data used should be clarified.
4	The NO2 verification factor was not considered suitable for adjusting PM10 and PM25 concentrations, and no alternative was used and no adjustment was applied. It is noted PM10 and PM2.5 concentrations are low and are not likely to exceed respective AQS air quality objectives. CD010 was not used in model verification. The site was included in the baseline conditions, and appears to be on a road close to the development included in the model network. Please clarify why this site was excluded from verification. The height of modelled railway lines has not been provided. Please clarify if the railway lines were modelled at height. If so, it would be suitable to include receptors at various heights to capture the impacts of diesel trains.
6	A Dust Risk Assessment was undertaken. The risk level for the site was determined to be Medium. Appropriate mitigation was included. The dust risk assessment was conducted in accordance to 2014 SPG guidance. The report references a 2016 IAQM guidance document, please confirm this reference as the Assessment of dust from demolition and construction was previously published in 2014. The AQA also notes the 2023 IAQM guidance was withdrawn. Updated IAQM guidance was published in 2024, and the air quality assessment was published in February 2024. It is recognised the 2024 guidance was published very close to the completion of the air quality assessment, however consideration should be given to the new guidance and whether the classification updates would change the overall risk level identified by the assessment. If not, then this (i.e. using the 2014 SPG) is acceptable. However if it were to change then the assessment should be updated. A statement on this should be provided.
7	An Air Quality Neutral Assessment was undertaken. It has been determined that the proposed development is air quality neutral. The devlopment will heated by air source heat pumps and will be 'car-free', therefore it can be considered neutral in terms of building emissions and transport emissions respectively.
8	The development includes one backup generator, which has been confirmed to be limited to testing for a maximum of 10 hours per year. The backup generators will not run for more than 50 hours annually, and thus does not require assessment.
9	The development is a large-scale development sites; if the AQA is subject to an Environmental Impact Assessment an Air Quality Positive statement should be provided.

Recommended Conditions

1	All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless itcomplies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register.
2	Measures to control emissions during the demolition and construction phase relevant to a Medium risk site should be written into an Air Quality and Dust Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. The AQDMP should be approved by the LPA and the measures and monitoring protocols implemented throughout the construction phase (London Plan Policy SI 1 (D)).
3	Use of the backup generator(s) is restricted to emergency use and operational testing (less than 50 hours per year).

Received; SAP 10 proposed and nothing further required
Received; SAP 2012 proposed and nothing further required
Received; SAP 10 proposed but items still outstanding
Received; SAP 2012 proposed but items still outstanding
Not yet received - applicant to submit and provide reference --->
N/A

Glossary:

Acronym	Description
AQA	Air Quality Assessment
AQFA	Air Quality Focus Area
AQMA	Air Quality Management Area
AQN	Air Quality Neutral
AQP	Air Quality Positive
DRA	Dust Risk Assessment
IAQM	Institute of Air Quality Management
LAQM	Local Air Quality Management
LLAQM	London Local Air Quality Management
NRMM	Non Road Mobile Machinery
SAC	Special Areas of Conservation
SSSI	Site Special Scientific Interest