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Glossary

Acronym	Definition
APEC	Air Pollution Exposure Criteria
AQAP	Air Quality Action Plan
AQA	Air Quality Assessment
AQMA	Air Quality Management Area
AQO	Air Quality Objectives
AQS	Air Quality Strategy
ASR	Annual Status Report
AURN	Automatic Urban and Rural Network
Defra	Department for Environment, Food and Rural Affairs
DMP	Dust Management Plan
EPUK	Environmental Protection UK
EU	European Union
IAQM	Institute of Air Quality Management
LAQM	Local Air Quality Management
LNR	Local Nature Reserve
LAEI	London Atmospheric Emissions Inventory
LBW	London Borough of Wandsworth
NAQS	National Air Quality Strategy
NO	Nitric oxide
NO_2	Nitrogen dioxide
NO_x	Oxides of nitrogen
NRMM	Non-road Mobile Machinery
NTA	NTA Planning
PM	Particulate Matter
Ramsar Sites	Designated Wetland
SAC	Special Areas of Conservation
SPA	Special Protection Areas
SPG	Supplementary Planning Guidance
SSSI	Sites of Special Scientific Interest
WHO	World Health Organisation

1 Introduction

NTA Planning (NTA) are assisting their client with planning matters regarding a proposed development at Mount Clare Campus, Minstead Gardens, Roehampton Gate, SW15 4EE. Hereafter called the proposed development; it consists of the use of the site for temporary accommodation, comprising of 274 units.

The local authority responsible for determining the planning application is the London Borough of Wandsworth (LBW). NTA require an air quality assessment to support the planning application.

The potential air quality impacts arising as a result of the proposed development have been assessed using the latest planning guidance from Environmental Protection UK (EPUK) with the Institute of Air Quality Management (IAQM)[1] and the Department for Environment, Food and Rural Affairs (Defra)[2].

1.1 Objectives

This report provides an assessment on the following key issues associated with the construction and operational phases of the proposed development:

- Nuisance, loss of amenity and health impacts associated with the construction phase of the proposed development on sensitive receptors;
- Characterising the baseline conditions at the site using monitored pollutant data from LBW and Defra resources;
- Assessing the suitability of the proposed development for the addition of new residential receptors;
- Determining whether the proposed development is 'air quality neutral'; and
- Making recommendations for mitigation measures if required.

1.2 Proposed Development Location

The proposed development is located within the jurisdiction of LBW, in an area consisting of largely residential use.

The proposed development site lies within the Wandsworth Air Quality Management Area (AQMA), declared by LBW on 19/01/2001 for exceedance of both the:

- NO_2 annual mean air quality objective; and
- PM_{10} 24-hour mean air quality objective.

The nearest nationally designated ecological site is Richmond Park, which is both a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC). It is

[1] IAQM (2017): 'Land Use Planning and Development Control: Planning for Air Quality v1.2'.
[2] Defra (2022): 'Local Air Quality Management – Technical Guidance (TG22)'.

located approximately 150m west of the proposed development site. The proposed development location is illustrated in Figure 1.1.

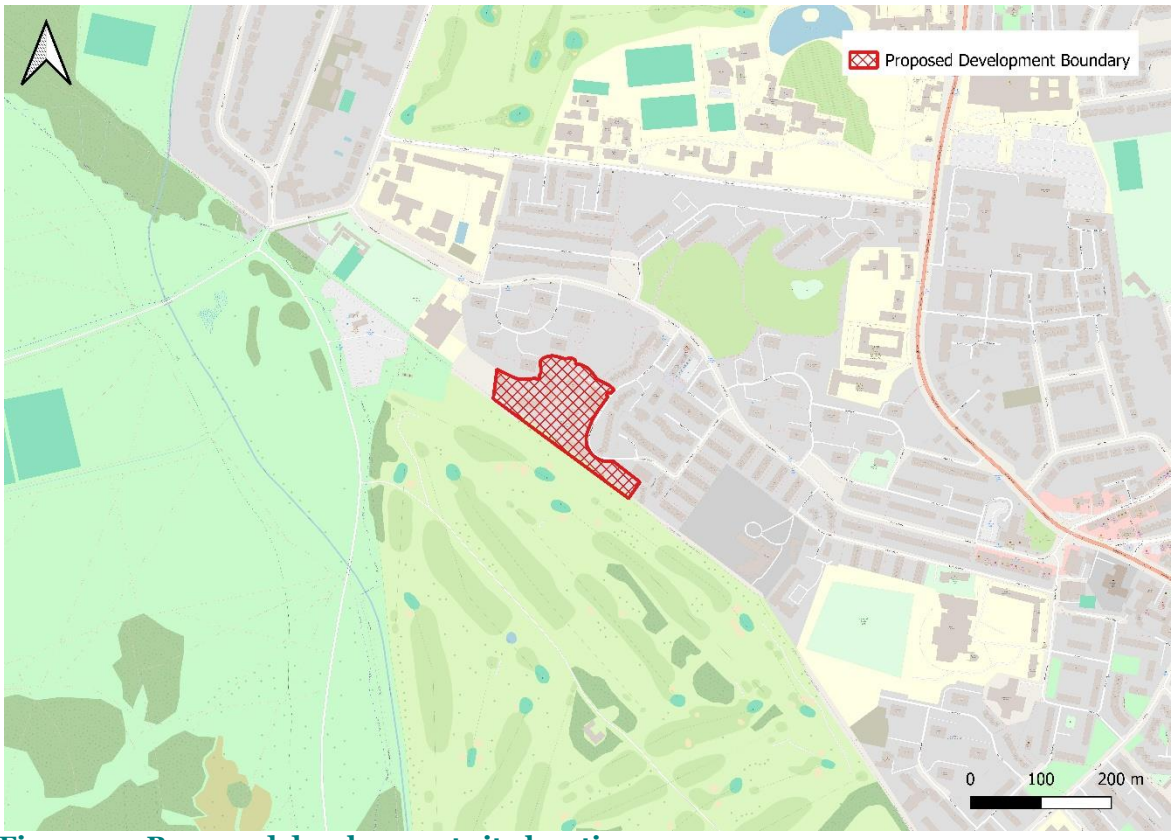

Figure 1.1: Proposed development site location

2 Pollutants and Legislation

All legislation, policy, statutory and non-statutory guidelines applicable to the proposed development can be found in Appendix A. This section outlines the relevant pollutants, their Air Quality Objectives (AQO) and where they are applicable.

2.1 Key Pollutants

The key pollutant associated with the construction phase of the project will be 'disamenity' or 'nuisance' dust. Nitrogen dioxide (NO_2) and particulate matter ($PM_{2.5}$ and PM_{10}) may also be associated with emissions from non-road mobile machinery (NRMM) and construction related traffic.

The key pollutants associated with the operational phase of the proposed development will be dust and road traffic emissions including NO_2, PM_{10} and $PM_{2.5}$. Further details of the key pollutants are presented below.

2.1.1 Disamenity Dust

'Dust' is generally regarded as particulate matter up to 75µm in diameter and in an environmental context can be considered in two size categories: coarser dust (particles greater than 10µm) and fine particulate matter (PM_{10} and $PM_{2.5}$) as described above.

Coarser dust (particles greater than 10µm) is generally regarded as 'disamenity dust' and can be associated with annoyance, although there are no official standards for dust annoyance[3]. Disamenity dust is more readily described than defined as it relates to the visual impact of short-lived dust clouds and the long-term soiling of surfaces.

Although it is a widespread environmental phenomenon, dust is also generated through many anthropogenic activities including materials handling, construction, demolition, and vehicle use. Dust is generally produced by mechanical action on materials and is carried by moving air when there is sufficient energy in the airstream. More energy is required for dust to become airborne than for it to remain suspended.

2.1.2 Nitrogen Dioxide

NO_2 and nitric oxide (NO) are collectively referred to as oxides of nitrogen (NO_x). During fuel combustion, atmospheric nitrogen combines with oxygen to form NO, which is not considered harmful. Through a chemical reaction with ozone (O_3), NO further combines with oxygen to create NO_2.

Short-term exposure to concentrations of NO_2 can cause inflammation of the airways and increase susceptibility to respiratory infections and to allergens. NO_2 can exacerbate the symptoms of those already suffering from lung or heart conditions.

2.1.3 Particulate Matter

Particulate matter (PM) is everything in the air that is not a gas and therefore consists of a huge variety of chemical compounds and materials, some of which can be toxic.

[3] Note that the expression 'nuisance dust' refers here to 'generally visible particulate matter' rather than specifically and in a legal sense to statutory nuisance, as defined in Section 79 of the Environmental Protection Act 1990.

Due to the small size of many of the particles that form PM some of these toxins may enter the bloodstream and be transported around the body, lodging in the heart, brain and other organs. Therefore, exposure to PM can result in serious impacts to health, especially in vulnerable groups of people such as the young, elderly, and those with respiratory problems.

Particulates are classified according to size: particles are less than 10 micrometres in diameter (PM_{10}) and less than 2.5 micrometres in diameter ($PM_{2.5}$).

2.2 Relevant Air Quality Objectives

The AQO listed in Table 2.1 are only applicable at locations where a member of the public could be reasonably expected to spend the relevant averaging period. Further examples of this are presented in Table 2.2.

Table 2.1: Relevant AQO

Pollutant	Averaging Period	AQO (µg/m³)	Exceedance Allowance	Percentile Equivalent
Nitrogen Dioxide (NO_2)	Annual	40	-	-
	1-hour	200	18 per annum	99.79th
Particulate Matter (as PM_{10})	Annual	40	-	-
	24-hour	50	35 per annum	90.41st
Particulate Matter (as $PM_{2.5}$)	Annual	20	-	-

Source: https://uk-air.defra.gov.uk/air-pollution/uk-limits.php

Table 2.2: Examples of where AQO should apply

Averaging period	AQO should apply at	AQO should not apply at
Annual	All locations where members of the public might be regularly exposed. Building façades of residential properties, schools, hospitals, care homes etc.	Building façades of offices or other places of work where members of the public do not have regular access. Hotels, unless people live there as their permanent residence. Gardens of residential properties. Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short-term.
24 Hour	All locations where the annual mean objective would apply, together with	Kerbside sites (as opposed to locations at the building façade),

Averaging period	AQO should apply at	AQO should not apply at
	hotels and gardens of residential properties[a].	or any other location where public exposure is expected to be short-term.
1 Hour	All locations where the annual mean and 24 and 8-hour mean objectives apply. Kerbside sites (for example, pavements of busy shopping streets). Those parts of car parks, bus stations and railway stations etc. which are not fully enclosed, where members of the public might reasonably be expected to spend one hour or more. Any outdoor locations where members of the public might reasonably have expected to spend one hour or longer.	Kerbside sites where the public would not be expected to have regular access.

Notes: [a] "*Such locations should represent parts of the garden where relevant public exposure to pollutants is likely, for example where there is seating or play areas. It is unlikely that relevant public exposure to pollutants would occur at the extremities of the garden boundary, or in front gardens, although local judgement should always be applied*

Source: Department for Environment Food and Rural Affairs (2022): 'Local Air Quality Management Technical Guidance' (TG.22).

3 Methodology

This section sets out the approach taken to assess the potential impacts on air quality during the construction and operational phases of the proposed development.

3.1 Scope of the Assessment

Table 3.1 shows the proposed scope of work.

Table 3.1: Scope of Work

Scope	Consideration
Spatial	The assessment considers the impact of NO_2, PM_{10} and $PM_{2.5}$ emissions from local sources upon the proposed development site.
Temporal	The construction phase impacts resulting from the proposed development have been considered for the earliest possible construction year (2025). The operational phase impacts resulting from the proposed development have been considered for the earliest possible year of occupation (2025).

3.2 Construction Phase

The proposed development has the potential to generate dust during the remaining construction phases of the project. Although there are no standards (such as AQO) for dust disamenity or annoyance, various 'customs and practice' criteria have become established.

For the purposes of this assessment, IAQM's 2024 Construction Dust Risk guidance[4] has been used to carry out a construction dust risk assessment. The IAQM guidance provides a methodology (Appendix B) to evaluate potential risk of dust generation for a development and the level of mitigation required. The impact of the development is described using one of the following three categories: 'Low Risk', 'Medium Risk' and 'High Risk'. Based on the risk level, appropriate mitigation measures can be considered to minimise any risk of dust impacts from the construction phase.

3.3 Operational Phase

3.3.1 Point Source Emissions

The exact plant arrangements have not been determined at this stage, but the aspiration is for the proposed development to be all electric, and no new gas fired plant will be installed.

An assessment of point source emissions can therefore be scoped out.

[4] Institute of Air Quality Management (2024): 'Guidance on the Assessment of Dust from Demolition and Construction v2.2'

3.3.2 Road Source Emissions

The IAQM and EPUK planning guidance which informs this assessment contains indicative criteria on when to proceed to a detailed assessment. The criteria relating to changes in traffic flow are as follows:

A change of HDV flows of:

- More than 25 annual average daily traffic (AADT) flows within, or adjacent to, an AQMA;
- More than 100 AADT elsewhere.

A change of LDV flows of:

- More than 100 AADT within or adjacent to an AQMA;
- More than 500 AADT elsewhere.

The proposed scheme is located within an AQMA; therefore, the more stringent criteria apply.

The scheme transport consultants, Mode Transport, have confirmed that the indicative criteria will not be triggered. A detailed assessment of the potential impact of road source emissions upon existing receptors can be scoped out.

3.3.3 Air Quality Neutral Assessment

Policy SI 1 within the London Plan requires developments to be 'air quality neutral', the aim of which is to bring forward developments that are air quality neutral or better and that do not degrade air quality in areas where air quality objectives are not currently being achieved.

The air quality neutral guidance[5] was published on 08/02/2023, following public engagement on the draft in 2022. This assessment will follow the air quality neutral guidance.

[5] https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/air-quality-neutral-aqn-guidance

4 Baseline Conditions

The following section sets out the baseline conditions in relation to air quality at the proposed development site. For the purpose of this assessment, data has been obtained from the LBW Air Quality Annual Status Report (ASR) for 2023[6] and the Defra air quality resource website[7].

4.1 LBW Automatic Monitoring

In 2023, LBW undertook automatic monitoring at seven locations within its jurisdiction. As illustrated in Figure 4.1, the nearest sites are over 2.7km from the proposed development.

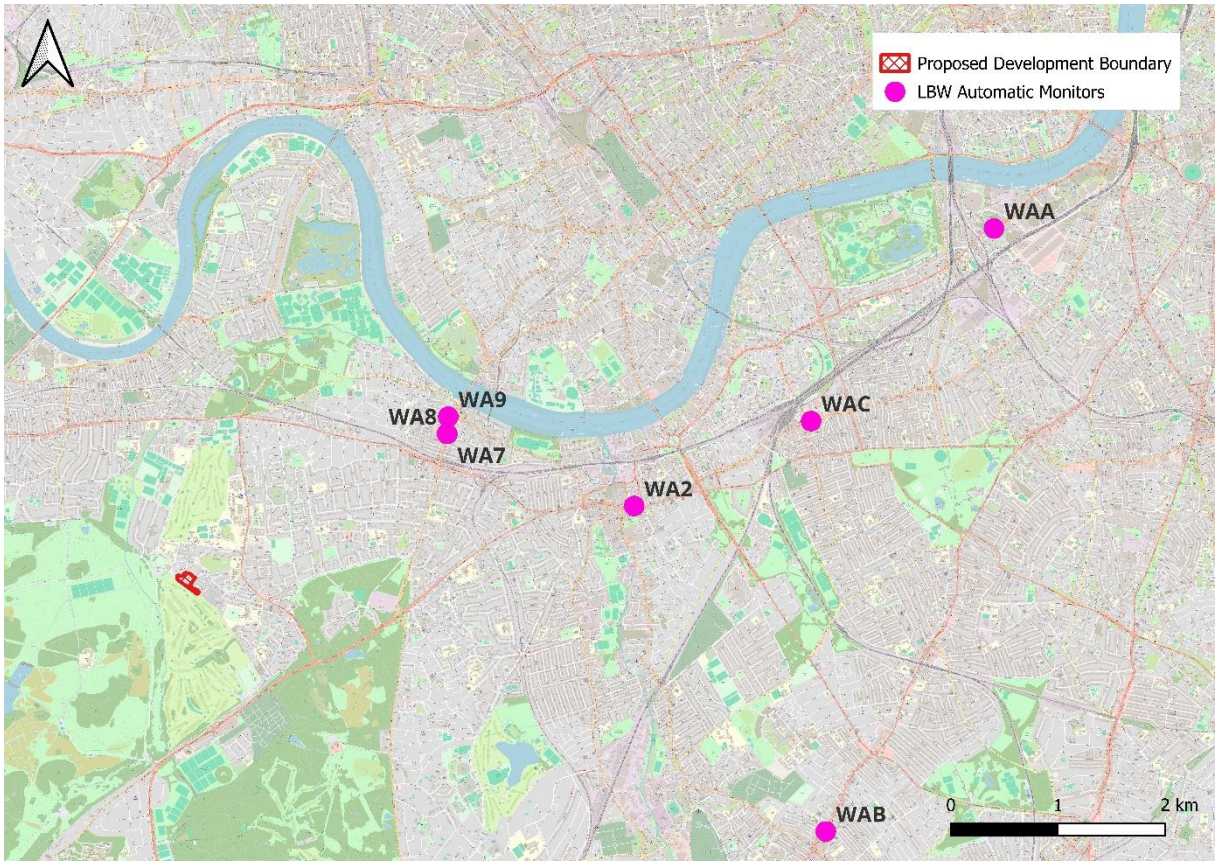

Figure 4.1: LBW Automatic Monitor Locations

Due to the distance and location of the automatic monitors in relation to the proposed development, they are not considered representative of the proposed development site and are not considered further.

4.2 LBW Diffusion Tube Monitoring

[6] London Borough of Wandsworth (2024).'Air Quality Annual Status Report for 2023'.
[7] Department for Environmental Food and Rural Affairs. Accessible at: https://uk-air.defra.gov.uk/data/tools

LBW undertook diffusion tube monitoring at 58 locations within its borough in 2023. As illustrated in Figure 4.2, the nearest site is 480m northwest of the proposed development site.

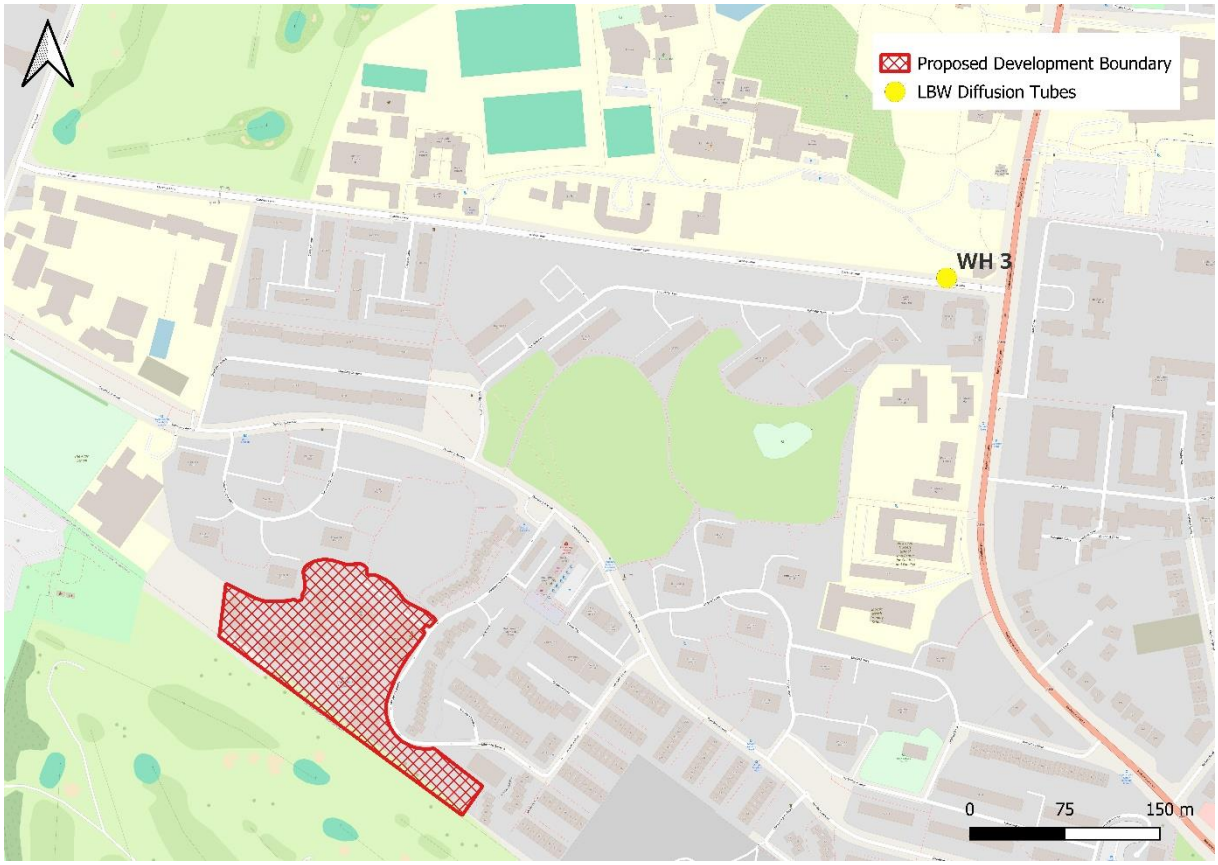

Figure 4.2: LBW Diffusion Tube Locations

Table 4.1 presents the monitored NO_2 concentrations recorded at WH 3 for the latest three-year period available.

Table 4.1: Diffusion Tube NO_2 Annual Mean Concentrations

Site ID	Site Type	Annual mean NO_2 Concentrations (µg/m³)		
		2021	2022	2023
WH 3	Roadside	34	29	25

Notes: Exceedance of the NO_2 annual mean AQO of 40µg/m³ are shown in **bold**.

NO_2 annual means in excess of 60µg/m³, indicating a potential exceedance of the NO_2 hourly mean AQO are shown in **bold** and underlined.

a) Means were "annualised" in accordance with LAQM Technical Guidance, when valid data capture is less than 75%.

4.3 Defra Modelled Background Pollution Concentrations

Defra provides background pollution concentration estimates to assist local authorities in undertaking their 'Review and Assessment' work. This data is available to download from the Defra air quality resource website for NO_x, NO_2, PM_{10} and $PM_{2.5}$ for every 1km

X 1km grid square for all local authorities. The current dataset is based on 2021 background data and future year projections are available for 2021 to 2040.

Table 4.2 presents the predicted background concentrations for the earliest anticipated year of occupation (2025) for the proposed development.

Table 4.2: Defra Projected Background Concentrations at Proposed Development

Year	Annual mean Concentration (µg/m3)		
	NO_2	PM_{10}	$PM_{2.5}$
2025	14.8	13.1	7.8

Note: Data presented within the table are derived from the following ordinance survey grid square: 521500, 173500; 521500, 174500.

4.4 Baseline Summary

The data from WH3 has been used to inform ambient NO_2 concentrations at the proposed development.

In the absence of representative PM monitoring, the Defra backgrounds have been used to inform ambient PM_{10} and $PM_{2.5}$ concentrations.

5 Potential Impacts

5.1 Construction Phase

It is understood from NTA that no demolition is required.

The impacts from earthworks, construction and trackout have been considered. To assess the worst-case scenario, it has been assumed that the activities will be carried out for the duration of the construction period. Figure 5.1 shows the construction dust risk assessment buffers based on the recommended distances by IAQM.

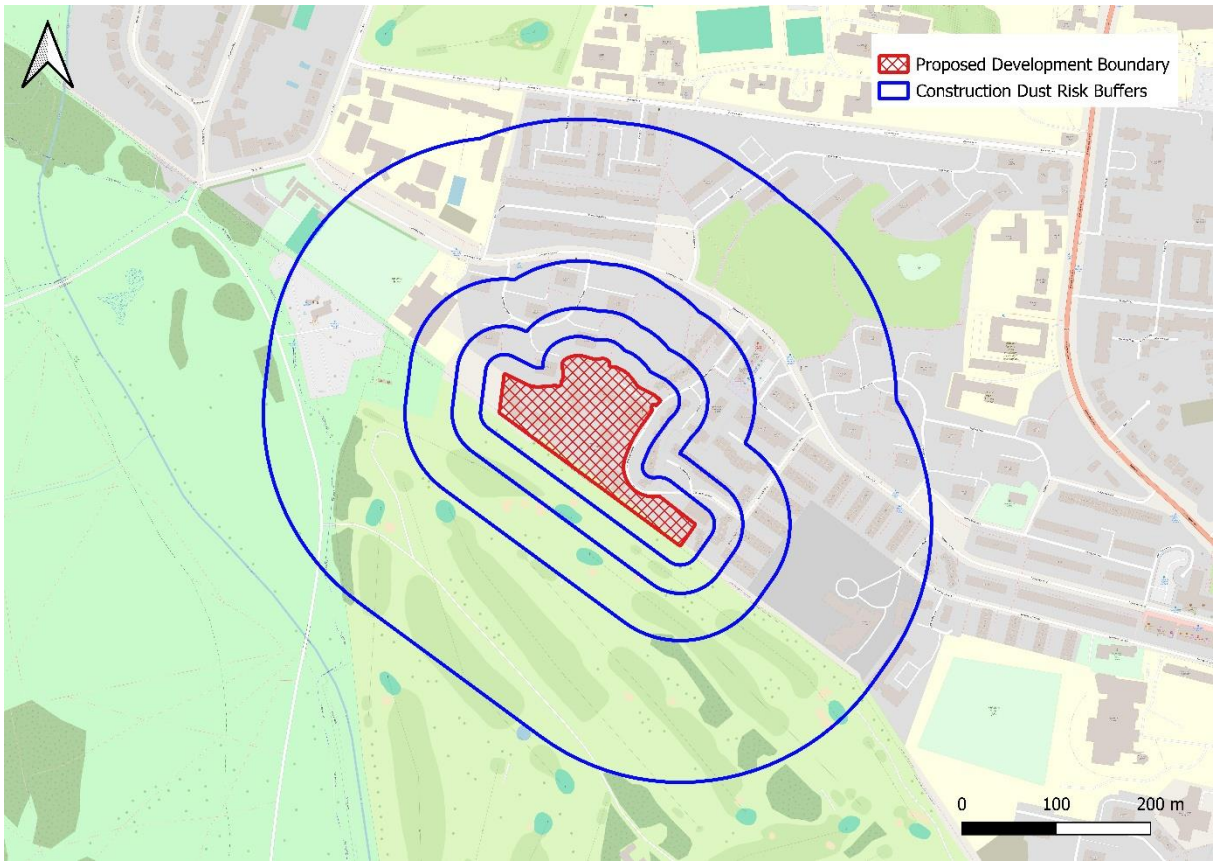

Figure 5.1: Construction Dust Risk Assessment Buffers

Magnitude and sensitivity descriptors that have been applied to assess the overall impact of the construction phase are presented in Appendix B.

The dust emission magnitude for earthworks is 'Small', with the total earthworks area measuring below 18,000m^2.

The dust emission magnitude for construction is expected to be 'Small', with the total building volume below 25,000m^3.

It is anticipated that the outward daily peak HGV movements will be less than 20 HDV movements in a day, so the dust emission magnitude for trackout has been assigned as 'Small'.

Table 5.1: Dust Emission Magnitude

Activity	Dust Emission Magnitude
Demolition	N/A
Earthworks	Small
Construction	Small
Trackout	Small

The Richmond Park SSSI and SAC is located approximately 150m west of the proposed development site. It is considered a high sensitivity receptor.

Residential receptors are considered to be a 'High' sensitivity receptor. There are over 100 residential receptors within 20m of the site boundary.

Table 5.2 presents the sensitivity of the surrounding area to effects caused by construction activities and is based on the criteria presented in Appendix B.

Table 5.2: Sensitivity of Study Area

Potential Impact	Activity			
	Demolition	Earthworks	Construction	Trackout
Dust Soiling	N/A	High	High	High
Human Health	N/A	Low	Low	Low
Ecological	N/A	High	High	High

The overall risk of dust soiling and human health impacts to high sensitivity receptors are presented in Table 5.3. The risk is based on the criteria presented in Appendix B.

Table 5.3: Summary of the Risk of Construction Dust Impacts

Potential Impact	Risk			
	Demolition	Earthworks	Construction	Trackout
Dust Soiling	N/A	Low Risk	Low Risk	Low Risk
Human Health	N/A	Negligible	Negligible	Negligible
Ecological	N/A	Low Risk	Low Risk	Low Risk

Based upon the above, the largest risk associated with dust soiling is classified as 'Low'. With respect to human health impacts, the risk is no greater than 'Negligible' and the largest risk upon ecological receptors is 'Low'.

Mitigation measures appropriate for the proposed development have been presented in Appendix C. Following the implementation of these mitigation measures, the impacts from the construction phase of the proposed development on dust soiling and human health are considered not to be significant.

5.2 Operational Phase

5.2.1 Suitability for Use

The proposed development is temporary residential accommodation, so all of the objectives listed in Table 2.1 are applicable.

The data from WH3 has been used to inform ambient NO_2 concentrations at the proposed development.

The NO_2 monitored data, presented in Table 4.1, show that all AQO for NO_2 will be met at the proposed development site. The site is over 200m from any major roads and is considered to be an urban background site.

The PM_{10} and $PM_{2.5}$ concentrations presented in Table 4.2 show that all PM AQO for will be met across the proposed development site.

According to the London Councils Air Quality and Planning Guidance, the Air Pollution Exposure Criteria (APEC) for the proposed development is APEC-A. This guidance suggests that

> *"No air quality grounds for refusal; however, mitigation of any emissions should be considered."*

The proposed development is considered suitable for occupation in 2025 and subsequent years if delayed.

5.2.2 Air Quality Neutral Assessment

The air quality neutral guidance provides benchmarks for transport and building emissions for each land-use class.

5.2.2.1 Building Emissions

In line with the air quality neutral guidance, it is classified as a major development.

The exact plant arrangements have not been determined at this stage, but the aspiration is for the proposed development to be all electric, and no new gas fired plant will be installed.

The proposed development is therefore air quality neutral with respect to building emissions.

5.3 Transport Emissions

As the proposed development is temporary residential accommodation, the benchmark for residential use has been used.

The total benchmark trip rate for the proposed development was calculated by multiplying the benchmark trip rate against the number of units. The total benchmark trip rate is presented in Table 5.4.

Table 5.4: Benchmark Trip Rate for the Proposed Development

Land Use	Number of Dwellings	Benchmark Trip Rate	Total Benchmark Trip Rate (trips/year)
Residential	274	114	31,236

The appointed transport consultant, Mode Transport, have confirmed that the proposed development will generate 68 trips per day, which is factored up to 24,820 per annum.

This is below the total benchmark trip rate of 31,236 presented in Table 5.4. The proposed development is air quality neutral with regards to transport emissions.

5.3.1.1 Conclusion

The proposed development is air quality neutral with regards to building and transport emissions.

6 Mitigation Measures

6.1 Construction Phase

6.1.1 Reducing Construction Dust Emissions

Particle generation from construction and demolition activities can be substantially reduced through carefully selected mitigation techniques and effective management. The most effective technique is to control at source, as once particles are airborne, it is difficult to prevent them from dispersing into the surrounding area. However, once airborne, water sprays are probably the most effective method for suppression.

Pre-project planning, implementation and on-site management issues are an essential requirement for effective dust control. This includes, for example, environmental risk assessments, method statements, training and satisfying planning requirements. Before the start of a project, it is also important to identify which construction activities are likely to generate dust and to draw up action plans to minimise emissions to the atmosphere. Dust emissions from construction sites will mainly be the sum of a large number of small activities. Therefore, attention to detail is a critical feature of effective management of the total site emissions.

Site specific mitigation measures should be set up based on the risk effects as outlined in Table 5.3. Examples of these measures are provided in the IAQM guidance document and summarised in Appendix C.

6.2 Operational Phase

6.2.1 Reducing Vehicle Emissions

Secure cycle storage is being provided to encourage this sustainable method of travel.

EV charge points will also be installed.

7 Conclusion

This report provides an assessment on the following key issues associated with the construction and operation phases of the proposed development at Mount Clare Campus, Minstead Gardens, Roehampton Gate, SW15 4EE:

- Nuisance, loss of amenity and health impacts associated with the construction phase of the proposed development on sensitive receptors;
- Characterising the baseline conditions at the site using monitored pollutant data from LBW and Defra resources;
- Assessing the suitability of the proposed development for the addition of new residential receptors;
- Determining whether the proposed development is 'air quality neutral'; and
- Making recommendations for mitigation measures if required.

A qualitative assessment on the construction phase activities has been carried out. The largest risk of these activities towards dust soiling and ecological receptors was considered to be 'Low', while that towards human health was considered to be 'Negligible'. Following proper implementation of the measures recommended in Appendix C, the impact of emissions during construction of the development is likely to be 'Negligible' and therefore 'Not Significant'.

The change in trip generation associated with the proposed development is unlikely to result in a detrimental pollution impact upon the local highway network and the current pollution levels.

Following a review of air quality data, the proposed development is considered suitable for the introduction of new residential receptors. The proposed development is air quality neutral with regards to both building and transport emissions and no further mitigation measures are required.

It can therefore be concluded that the proposed development is not considered to conflict with national, regional, and local planning guidance.

Appendix A: Legislation, Policy and Non-Statutory Guidance

European Union

Whilst the UK has left the EU, it is pertinent to understand the origins of the current UK legislation. The European Union (EU) sets legally binding limit values for outdoor air pollutants to be met by EU countries by a given date. These limit values are based on the World Health Organisation (WHO) guidelines on outdoor air pollutants. These are legally binding and set out to protect human health and the environment by avoiding, preventing or reducing harmful air pollution effects.

Directive 2008/50/EC[8] on ambient air quality and cleaner air for Europe entered into force in June 2008. This merged the existing 'Daughter' Directives[9,10,11,12] (apart from the fourth Daughter Directive), maintaining existing air quality objectives set out by 'Daughter' Directives for:

- Sulphur dioxide (SO_2);
- Nitrogen dioxide (NO_2);
- Oxides of nitrogen (NO_x);
- Particulate matter ($PM_{2.5}$ and PM_{10});
- Lead (Pb);
- Benzene(C_6H_6);
- Carbon monoxide (CO); and
- Ozone (O_3).

Directive 2008/50/EC also includes related objectives, exposure concentration obligations and exposure reduction targets for $PM_{2.5}$ (fine particles). The 'Daughter' Directives were based upon requirements set out in the first EU Ambient Air Quality Framework Directive 96/92/EEC[13].

England

The 2008 EU ambient air quality directive 2008/50/EC was transposed into English law through the introduction of the Air Quality (Standards) Regulations in 2010[14] which also incorporated the fourth EU Daughter Directive (2004/107/EC) that set target values for certain toxic heavy metals and polycyclic aromatic hydrocarbons (PAH).

[8] European Union. (2008), 'Ambient air quality assessment management', Framework Directive 2004/50/EC.
[9] European Union. (1999), 'Ambient air quality assessment management', Framework Directive 1999/30/EC.
[10] European Union. (2000), 'Ambient air quality assessment management', Framework Directive 2000/3/EC.
[11] European Union. (2002), 'Ambient air quality assessment management', Framework Directive 2002/3/EC.
[12] European Union. (2004), 'Ambient air quality assessment management', Framework Directive 2004/107/EC.
[13] European Union. (1996), 'Ambient air quality assessment management', Framework Directive96/62/EC.
[14] Statutory Instrument. (2010), 'The Air Quality Standards Regulations', No. 1001. Queen's Printer of Acts of Parliament.

The UK government has a legal responsibility to meet the limit values converted into domestic law through the European Union (Withdrawal) Act 2018. Part IV of the 2021 Environment Act[15] sets guidelines for protecting air quality in the UK and forms the basis of local air quality management. The Environment Act requires local authorities in the UK to review air quality in their area periodically and designate AQMAs where the objectives are not being achieved or are not likely to be achieved within the relevant period. Where an AQMA is designated, local authorities are also required to produce an 'Air Quality Action Plan' (AQAP) detailing the pollution reduction measures that need to be adopted to achieve the relevant air quality objectives within an AQMA.

As part of the Environment Act, the UK Government was required to publish a National Air Quality Strategy (NAQS) to establish the system of 'local air quality management' (LAQM) for the designation of AQMAs. This led to the introduction of the first Air Quality Strategy (AQS) in 1997[16] which has since progressed through several revisions until it was replaced by the Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2007[17]. Each revision introduced strategies and regulations that considered measures for different pollutants by tightening existing objectives and also by introducing new ones to establish a common framework to protect human health and the environment by achieving ambient air quality improvements.

National Planning Policy Framework

The principal national planning policy guidance in respect of the proposed development is the National Planning Policy Framework (NPPF)[18]. The most recent update of the NPPF was published in December 2024 by the Ministry of Housing, Communities & Local Government.

The NPPF 2024 contains five sections which are relevant to air quality.

Section 110 states that:

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

Section 187 (e) states that:

> *"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*

[15] Parliament of the United Kingdom. (2021), 'Environmental Protection Act'.
[16] Department for Environment Food and Rural Affairs. (1997), 'The United Kingdom National Air Quality Strategy', Cm 3587, Department for Environment Food and Rural Affairs.
[17] Department for Environment Food and Rural Affairs. (2007), 'The Air Quality Strategy for England, Scotland, Wales and Northern Ireland', Cm 7169, Department for Environment Food and Rural Affairs.
[18] National Planning Policy Framework. Accessible at: https://www.gov.uk/government/publications/national-planning-policy-framework--2

should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information…"

Section 198 states that:

"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."

Section 199 states 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."

Section 201 states that:

"The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities."

National Planning Practice Guidance

The DCLG published a number of supporting web-based resources of Planning Practice Guidance (PPG)[19] to supplement the NPPF. With respect to air quality the PPG[20] provides guidance on when air quality is relevant to a planning application. It 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

[19] National Planning Practice Guidance web-based resource. Accessible at: http://planningguidance.planningportal.gov.uk/
[20] Paragraph: 005 Ref ID 32-005-20140306, revision date 01.11.2019

species). Air quality may also be a material consideration if the proposed development would be particularly sensitive to poor air quality in its vicinity."

The PPG also states that, when deciding whether air quality is relevant to a planning application, the applicant should consider whether the proposal will:

- *"Lead to changes (including any potential reductions) in vehicle-related emissions in the immediate vicinity of the proposed development or further afield……*
- *Introduce new point sources of air pollution…..,*
- *Expose people to harmful concentrations of air pollutants …..,*
- *Give rise to potentially unacceptable impact (such as dust) during construction for nearby sensitive locations….,*
- *Have a potential adverse effect on biodiversity, especially where it would affect sites designated for their biodiversity value."*

Statutory Nuisance

It is recognised that the planning system presents a way of protecting amenity. However, in cases where planning conditions are not applicable to a development/installation, the requirements of the Environmental Protection Act 1990 still apply. Under Part III of the Environmental Protection Act 1990, local authorities have a statutory duty to investigate any complaints of:

- *"any premises in such a state as to be prejudicial to health or a nuisance*
- *smoke emitted from premises so as to be prejudicial to health or a nuisance*
- *fumes or gases emitted from premises so as to be prejudicial to health or a nuisance*
- *any dust, steam, smell or other effluvia arising on industrial, trade or business premises and being prejudicial to health or a nuisance*
- *any accumulation or deposit which is prejudicial to health or a nuisance"*

Where the local authority establishes that any one of these issues constitutes a statutory nuisance and believes it to be unreasonably interfering with the use or enjoyment of someone's premises and/or is prejudicial to health, an abatement notice will be served on the person responsible for the offence or the owner / occupier. Failure to comply with the notice could lead to a prosecution. It is however considered as a defence if the best practicable means to prevent or to counteract the effects of the nuisance are employed.

Regional (London)

London Plan

The London Plan 2021[21] sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

The London Plan 2021 includes one policy that is specifically related to air quality. Policy SI 1 "*Improving air quality*" states:

> *"A Development Plans, through relevant strategic, site-specific and area-based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.*
>
> *B To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:*
>
> *1 Development proposals should not:*
>
> *a) lead to further deterioration of existing poor air quality*
>
> *b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits*
>
> *c) create unacceptable risk of high levels of exposure to poor air quality.*
>
> *2 In order to meet the requirements in Part 1, as a minimum:*
>
> *a) Development proposals must be at least Air Quality Neutral*
>
> *b) Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retrofitted mitigation measures*
>
> *c) Major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1*
>
> *d) Development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people, should demonstrate that design measures have been used to minimise exposure.*
>
> *C Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:*

[21] Greater London Authority. (2021), 'The London Plan: Spatial Development Strategy for London March 2021.

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.*

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

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

The Mayor of London Environment Strategy

The Mayor of London Environment Strategy[22], published on 31st May 2018, integrates every aspect of London's environment into different categorised areas. The document includes several transport and non-transport related policy measures outlined in Chapter 4, highlighting the need for improvement in London's air quality.

Policy 4.2 states:

- *"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."*
- *"Reduce emissions from non-road transport sources, including by phasing out fossil fuels."*

Proposals for this policy include the phasing out of fossil fuels for private and public transport, as well as from freight vehicles, prioritising action on diesel fuels and implementing the switch to zero emission technologies. The reduction in emission from NRMM, construction and demolition sites, homes and workplaces and large-scale generators is proposed for this policy.

Policy 4.3 states:

- *"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."*
- *"The Mayor will encourage the take up of ultra-low and zero emission technologies to make sure London's entire transport system is zero*

[22] Greater London Authority. (2018), 'London Environment Strategy'.

emission by 2050 to further reduce levels of pollution and achieve WHO air quality guidelines."

- *"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."*
- *"Work to reduce exposure to indoor air pollutants in the home, schools, workplace and other enclosed spaces."*

Proposals for this policy include the switching of fleet vehicles to zero emission capability, implementation of local zero emission zones from 2020, ensure all new large-scale developments are 'Air Quality Neutral' and maintain Air Quality Neutral requirements for all developments. The reduction in emissions from wood and other solid fuel burning, using the planning system to reduce indoor exposure though design measures, preventing poor air quality entering the building and ensuring CO_2 and pollution targets are achieved are also proposals included for this policy.

The Mayor of London Transport Strategy

In March 2018 the Mayor of London published the Mayors Transport Strategy[23], setting out the Mayor's policies and proposals, enabling transport in London to be reshaped over the next 20 years.

The key themes within the strategy are; healthy streets and healthy people, good public transport experiences, new homes and jobs.

Chapter 3, section C "*Improving air quality and the environment*" includes policies 6 and 7 which relate to transport and air quality.

Policy 6 states:

> *"The Mayor, through TfL and the boroughs, and working with stakeholders, will take action to reduce emissions – in particular diesel emissions – from vehicles on London's streets, to improve air quality and support London reaching compliance with UK and EU legal limits as soon as possible. Measures may include retrofitting vehicles with equipment to reduce emissions, promoting electrification, road charging, the imposition of parking charges/ levies, responsible procurement, the making of traffic restrictions/ regulations and local actions."*

Policy 7 states:

> *"The Mayor, through TfL and the boroughs, and working with stakeholders, will seek to make London's transport network zero emission by 2050, contributing towards the creation of a zero carbon city, and also to deliver further improvements in air quality to help meet tighter air quality standards, including achieving a health-based target of 10µg/m^3 for $PM_{2.5}$ by 2030. London's streets and transport infrastructure will be transformed to enable*

[23] Greater London Authority. (2018), 'Mayor's Transport Strategy'.

zero emission operation, and the switch to ultra low and zero emission technologies will be supported and accelerated."

Local (London Borough of Wandsworth)

Wandsworth Local Plan

Wandsworth's existing Local Plan consists of several documents. The Core Strategy[24], adopted in 2016, sets out the strategic spatial vision for the borough and contains one policy relating directly to air quality. Policy IS 4, '*Protecting and enhancing environmental quality*' states:

> "*The Council will support measures to protect and enhance the environmental quality of the borough and work with partner agencies to help deliver this. In particular measures will be taken to*
>
> *.....*
>
> *b) Improve air quality in line with the Council's Air Quality Action Plan and minimise the emissions of air pollution from development, in line with the approach set out in the Mayor of London's Sustainable Design & Construction Supplementary Planning Guidance, ensuring that new major developments are air quality neutral in line with the London Plan."*

7.1.1 London Borough of Wandsworth Air Quality Action Plan

The LBW Air Quality Action Plan (AQAP) 2023-2028[25], outlines actions that LBW will undertake to improve air quality across the borough. For further details refer to the AQAP.

[24] London Borough of Wandsworth. (2016), 'Core Strategy.'
[25] London Borough of Wandsworth. (2023), 'Air Quality Action Plan 2023-2028'

Appendix B: Construction Dust Risk Assessment Criteria

IAQM guidance framework on assessing the risk of dust proposes the construction phase should be split into phases dependent on their potential impacts, determining the risk for each individually. Therefore, this assessment has determined the risk of the four construction categories put forward by the IAQM guidance:

- Demolition;
- Earthworks;
- Construction; and
- Track out (transport of dust and dirt onto the public road network).

The IAQM guidance framework states that the risk of dust impacts from the four categories can be defined as 'negligible', 'low risk', 'medium risk' or 'high risk' depending upon the scale and nature of the construction activity and the sensitivity and proximity of receptors to the construction site boundary. This categorisation is used to put forward appropriate mitigation measures, reducing the level of effects from the dust impacts so they are not significant.

The assessment of dust impacts using the IAQM guidance considers three separate effects from dust:

- Annoyance due to dust soiling;
- Harm to ecological receptors; and
- The risk of health effects due to significant increase in exposure to PM_{10}.

Step 1 of the assessment is set out to screen for the requirement for a more detailed assessment for the proposed development. The screening criteria states:

A 'human receptor' within:

- 250m of the boundary of the application site; or
- 50m of the route(s) used by construction vehicles on the public highway, up to 250m from the site entrance(s).

An 'ecological receptor' within:

- 50m of the boundary of the application site; or
- 50m of the route(s) used by construction vehicles on the public highway, up to 250m from the site entrance(s).

Where there are no receptors and the level of risk is deemed 'negligible', there is no need for further assessment.

Step 2A of the assessment enables the overall dust emission magnitude (small, medium or large) from each dust source (demolition, earthworks, construction and trackout) to be identified in relation with the criteria outlined in Table C.1.

Table C.1: Dust emission magnitude

Source	Large	Medium	Small
Demolition	Total building volume >75,000m^3, potentially dusty construction material (e.g. concrete), on-site crushing and screening, demolition activities >12m above ground level.	Total building volume 12,000m^3– 75,000m^3, potentially dusty construction material, demolition activities 6-12m above ground level.	Total building volume <12,000m^3, construction material with low potential for dust release (e.g. metal cladding or timber), demolition activities <6m above ground, demolition during wetter months.
Earthworks	Total site area >110,000m^2, potentially dusty soil type (e.g. clay, which will be prone to suspension when dry due to small particle size), >10 heavy earth moving vehicles active at any one time, formation of bunds >6m in height.	Total site area 18,000m^2 –110,000m^2, moderately dusty soil type (e.g. silt), 5-10 heavy earth moving vehicles active at any one time, formation of bunds 3m-6m in height.	Total site area <18,000m^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.
Construction	Total building volume >75,000m^3, on site concrete batching or sandblasting.	Total building volume 12,000m^3 – 75,000m^3, potentially dusty construction material (e.g. concrete), on site concrete batching.	Total building volume <12,000m^3, construction material with low potential for dust release (e.g. metal cladding or timber).
Track out	>50 HDV (>3.5t) outward movements[a] in any one day[b], potentially dusty surface material (e.g. high clay content), unpaved road length >100m.	20-50 HDV (>3.5t) outward movements[a] in any one day[b], moderately dusty surface material (e.g. high clay content), unpaved road length 50m–100m.	<20 HDV (>3.5t) outward movements[a] in any one day[b], surface material with low potential for dust release, unpaved road length <50m.

Notes:
[a] Vehicle movement is a one-way journey. i.e. from A to B, and excludes the return journey.
[b] HDV movements during a construction project vary over its lifetime, and the number of movements is the maximum not the average.

Step 2B allows for the sensitivity of the area (high, medium or low) to be assessed and takes into account 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 existing local background concentration; and
- Site specific factors, such as whether there are natural shelters, such as trees, to reduce the risk of wind-blown dust.

Receptor sensitivity has been based on the highest of any criteria being met thus, the assessment is considered as robust. The sensitivity of the area is further determined for dust soiling, human health and ecosystem effects by considering the criteria presented in Table C.2.

Table C.2: Magnitude of Receptor Sensitivity

Source	High	Medium	Low
Sensitivities of people to dust soiling effects	• 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. • Indicative examples include dwellings, museums and other culturally important collections, medium and long term car parks[b] and car showrooms.	• Users would expect[a] to enjoy a reasonable level of amenity, but would not reasonably expect[a] 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[a] to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land. • Indicative examples include parks and places of work.	• The enjoyment of amenity would not reasonably be expected[a]; or • Property would not reasonably be expected[a] 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. • Indicative examples include playing fields, farmland (unless commercially-sensitive horticultural), footpaths, short term car parks[b] and roads.
Sensitivities of people to health effects of PM_{10}	• Locations where members of the public are exposed over a time period relevant to the air quality objective for PM_{10} (in the case of	• Locations where the people exposed are workers[d], and exposure is over a time period relevant to the air quality objective for	• Locations where human exposure is transient.[e] • Indicative examples include public footpaths, playing

Source	High	Medium	Low
	the 24-hour objectives, a relevant location would be one where individuals may be exposed for eight hours or more in a day).[c] • Indicative examples include residential properties. Hospitals, schools and residential care homes should also be considered as having equal sensitivity to residential areas for the purposes of this assessment.	PM_{10} (in the case of the 24-hour objectives, a relevant location would be one where individuals may be exposed for eight hours or more in a day). • Indicative examples include office and shop workers, but will generally not include workers occupationally exposed to PM_{10}, as protection is covered by Health and Safety at Work legislation.	fields, parks and shopping streets.
Sensitivities of receptors to ecological effects	• 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 such as vascular species included in the Red Data List For Great Britain. • Indicative examples include a Special Area of Conservation (SAC) designated for acid heathlands or a local site designated for lichens adjacent to the demolition of a large site containing concrete (alkali) buildings.	• 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. • Indicative example is a Site of Special Scientific Interest (SSSI) with dust sensitive features.	• Locations with a local designation where the features may be affected by dust deposition. • Indicative example is a local Nature Reserve with dust sensitive features.

The final step, Step 2C allows for the risk of impacts to be defined. The dust emission magnitude derived in Step 2A is combined with the sensitivity of the area defined in step 2B to determine the risk of effects on:

- Annoyance due to dust soiling;
- Harm to ecological receptors; and
- The risk of health effects due to an increase in exposure to PM_{10}.

The criteria for each of the dust sources are presented in Table C.3, Table C.4, Table C.5 and Table C.6.

Table C.3: Demolition

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

Table C.4: Earthworks

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

Table C.5: Construction

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

Table C.6: Track out

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

Appendix C: Construction Phase Mitigation Measures

The mitigation measures set out below are from IAQM's 2024 guidance for construction dust and are appropriate for the mitigation of the risk determined. The points below can be formerly adopted into a construction dust management plan.

Mitigation Measures:

- Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.
- Develop a Dust Management Plan.
- Display the name and contact details of person(s) accountable for air quality pollutant emissions and dust issues on the site boundary.
- Display the head or regional office contact information.
- Record and respond to all dust and air quality pollutant emissions complaints.
- Make a complaints log available to the local authority when asked.
- Carry out regular site inspections to monitor compliance with air quality and dust control procedures, record inspection results, and make an inspection log available to the local authority when asked.
- Increase the frequency of site inspections by those accountable for dust and air quality pollutant emissions issues when activities with a high potential to produce dust and emissions and dust are being carried out, and during prolonged dry or windy conditions.
- Record any exceptional incidents that cause dust and air quality pollutant emissions, either on or off the site, and the action taken to resolve the situation is recorded in the log book.
- Plan site layout: machinery and dust causing activities should be located away from receptors.
- Erect solid screens or barriers around dust activities or the site boundary that are, at least, as high as any stockpiles on site.
- Fully enclosure site or specific operations where there is a high potential for dust production and the site is active for an extensive period.
- 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 from site as soon as possible.
- Cover, seed or fence stockpiles to prevent wind whipping.
- Carry out regular dust soiling checks of buildings within 100m of site boundary and cleaning to be provided if necessary.
- Agree monitoring locations with the Local Authority. Where possible, commence baseline monitoring at least three months before demolition phase begins.
- Put in place real-time dust and air quality pollutant monitors across the site and ensure they are checked regularly.
- Ensure all on-road vehicles comply with the requirements of the London ULEZ.
- Ensure all non-road mobile machinery (NRMM) comply with the standards set within this guidance.
- Ensure all vehicles switch off engines when stationary – no idling vehicles.
- Avoid the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where possible.
- Impose and signpost a maximum-speed-limit of 10mph on surfaced haul routes and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).
- Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.
- Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).
- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.
- Ensure an adequate water supply on the site for effective dust/particulate matter mitigation (using recycled water where possible).
- Use enclosed chutes, conveyors and covered skips.

- Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.
- Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.
- Reuse and recycle waste to reduce dust from waste materials.
- Avoid bonfires and burning of waste materials.
- 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.
- 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.
- 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 securely covered to prevent escape of materials during transport.
- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).