

Statement of Conformity: Air Quality Assessment, Pope's Road, Brixton

Planning application (ref. 20/01347/FUL) for the Demolition of existing building and erection of a part G + 19, part G + 8 storey building comprising flexible A1/A3/B1/D1/D2 uses at basement, ground and first floor, restaurant use (A3) at floor 8 and B1 accommodation on floors 2 to 19, with plant enclosure at roof level, and associated cycle parking, servicing and all necessary enabling works.

Air Quality Consultants Ltd (AQC) prepared the Air Quality Assessment (dated March 2020) for the planning application ref. 20/01347/FUL. The Applicant, in consultation with the local planning authority, and other stakeholders, is amending the planning application. The key changes associated with the amended planning application include:

- Set back of the Western Elevation by 2.5m to provide additional public realm;
- Connection of the eastern and western blocks on the fourth floor;
- Adjustments to the design of the central block in-between the West and East block; and
- Inclusion of dedicated community space.

In light of the revised scheme, AQC have reviewed the above scheme changes, along with potential changes in air quality policy/ guidance; potential changes to the baseline conditions; and updated traffic data, to quantify the potential impact on air quality and determine whether the above changes will materially alter the conclusions of the Air Quality Assessment (March 2020).

The review has identified there have been no changes in air quality policy and technical guidance from those detailed in Section 2: Policy Context and Assessment Criteria of the Air Quality Assessment. In addition, air quality baseline conditions remain the same as those detailed in Section 4: Site Description and Baseline Conditions of the Air Quality Assessment. The amendments to the scheme design do not alter the overall approach to the methodology detailed in Section 3: Assessment Approach of the Air Quality Assessment, which remains applicable and valid.

Revised traffic data has been provided by the project's transport consultants (Caneparo Associates) and is detailed in Appendix A of this Statement of Conformity, along with a comparison against the traffic data used in the Air Quality Assessment. The revised traffic data shows that with the amendments to the scheme, the 24-hour annual average daily trips associated with the proposed development decreases on all road links, apart from Brixton Station Road for Light Duty Vehicles (LDV). Therefore, as higher vehicle trips (both LDV and Heavy Duty Vehicles (HDV)) were used in the air quality assessment, the predicted impacts of the Air Quality Assessment were worst-case and are considered likely to be lower with the scheme changes. With regards to Brixton Station Road, whilst LDV flows are anticipated to increase with the scheme changes, there are no air quality sensitive receptors on this road which have been considered in the Air Quality Assessment. As such, the results of the Air Quality Assessment remain applicable and valid.

The air quality neutral assessment calculations have been updated based on the revised area schedule (dated 16.06.20 (Rev. 1), provided by the project's planners, DP9) and revised annual vehicle trips (dated 25.06.20 (V5), provided by Caneparo Associates). The results of the updated air quality neutral assessment calculations are presented in Appendix B, which show that with the scheme changes, the proposed development remains better than air quality neutral in terms of transport emissions.

Given the above, in AQC's professional opinion, the revised scheme will not materially alter the conclusions of the Air Quality Assessment (March 2020), which remains applicable and valid.

Appendix A: Revised Traffic Data

Road Link	Air Quality Assessment (March 2020) Proposed Development Trips		Revised Scheme Development Trips	
	LDV	HDV	LDV	HDV
Brixton Station Road	37	3	69 (+32)	2 (-1)
B223 Atlantic Road	108	7	55 (-53)	3 (-4)
Pope's Road	37	3	0 (-37)	0 (-3)
Valentia Place	178	10	97 (-81)	8 (-2)
A23 Brixton Road	129	8	98 (-31)	5 (-3)
A203 Stockwell Road	141	7	33 (-108)	2 (-5)

Note: Change in trips associated with the scheme changes are shown in (bracket).

Appendix B: Air Quality Neutral Assessment

Table 1: Calculation of Transport Emissions for the Revised Scheme ^a

Description		Value		Reference
Retail (A1/A3)				
A	Total Car Trips per Year ^b	21,900		Caneparo Associates
B	Average Distance per Trip (km)	5.9		Table A7.3 in Air Quality Assessment
		NO_x	PM₁₀	-
C	Emissions per Vehicle-km (g)	0.370	0.0665	Table A7.4 in Air Quality Assessment
D	Residential Transport Emissions (kg/annum)	47.8	8.6	A x B x C / 1,000
Office (B1)				
E	Total Car Trips per Year ^b	28,971		Caneparo Associates
F	Average Distance per Trip (km)	7.7		Table A7.3 in Air Quality Assessment
		NO_x	PM₁₀	-
G	Emissions per Vehicle-km (g)	0.370	0.0665	Table A7.4 in Air Quality Assessment
H	Office Transport Emissions (kg/annum)	82.5	14.8	E x F x G / 1,000
Entire Revised Scheme				
Total Transport Emission (kg/annum)		130.3	23.4	D + H

^a The approach taken by Caneparo Associates to calculate expected Car Trips per Year from the revised scheme assumes no material primary trips for users for D1 / D2 use classes.

^b Each trip is 1-way (i.e. a return journey would be two trips).

Table 2: Calculation of Transport Emissions Benchmarks for the Revised Scheme ^a

Description		Value		Reference
Retail (A1/A3)				
A	Gross Internal Floor Area of Offices (m²)	2,942		DP9
		NO_x	PM₁₀	-
B	Benchmark Emissions (g/m²/annum)	219	39.3	Table A7.2 in Air Quality Assessment
C	Retail TEBs (kg/annum)	644.3	163.3	A x B / 1000
Office (B1)				
D	Gross Internal Floor Area of Offices (m²)	23,276		DP9
		NO_x	PM₁₀	
E	Benchmark Emissions (g/m²/annum)	11.4	2.05	Table A7.2 in Air Quality Assessment
F	Office TEBs (kg/annum)	265.3	47.7	D x E / 1000
Entire Revised Scheme				
Total TEBs (kg/annum)		909.6	163.3	C + F

^a The approach taken by Caneparo Associates to calculate expected Car Trips per Year from the development assumes no material primary trips for users, particularly by vehicle, for D1/D2 use classes. Thus, D1/D2 has not been included in TEBs calculations.

As shown in Table 1, the Total Transport Emissions are less than the Total Transport Emissions Benchmarks (shown in Table 2) for both NO_x and PM₁₀. The revised is thus better than air quality neutral in terms of transport emissions.