

Air Quality Statement – Addendum

1. Introduction

- 1.1. This addendum statement is for the Community Right to Build Order (CRtBO) on Phoenix Place submitted by the Mount Pleasant Association (MPA).
- 1.2. It is an addendum to the planning permission submitted by the Royal Mail Group, and outlines the key differences between the Air Quality impact of the two sites.
- 1.3. This statements shows that the MPA proposals do not in any way have a more negative impact upon Air Quality than the RMG proposals. There is some evidence that the MPA proposals have a more positive impact.
- 1.4. This statement refers to the following documents submitted as part of the RMG planning application
 - 1.4.1. Environmental Statement Non-Technical Summary
 - 1.4.2. Mount Pleasant Environmental Statement Vol 4A Appendix 11.2, 1 of 2.
- 1.5. This addendum also refers to the Design Statement submitted as part of the MPA's CRTBO application.

2. Royal Mail Group proposals - Impact on Air Quality

- 2.1. The overall impact on air quality is expected to be confined to the construction phase of the development. (Environmental Statement Non-Technical Summary p.12)
- 2.2. According to the Environmental Statement for the RMG's proposal, the following likely significant effects upon air quality are predicted to arise during the demolition and construction works:

'...A worst case, local, temporary effect of moderate adverse significance resulting from dust emissions from construction activities; and a worst case, local, temporary effect of minor adverse significance resulting from emissions from construction vehicles.' (Environmental Statement Non-Technical Summary p.15)
- 2.3. According to the Environmental Statement for the RMG's proposal, the impact upon air quality during construction will be not significant:

'Emissions from demolition and construction traffic would likely be small in comparison to existing conditions.' (Environmental Statement Non-Technical Summary p.15)

- 2.4. The Environmental Statement states that the completed development is predicted to see a slight improvement in Air quality for some nearby properties:
'Traffic on the local road network would be redistributed as a result of the Development. The air quality assessment predicted that traffic generated by the Entire Development and emissions from heating plant for all the Development Scenarios would not significantly affect local air quality, although a slight improvement in air quality is predicted at some nearby residential properties.' (Environmental Statement Non-Technical Summary p.15)

3. Mount Pleasant Association – similarities with RMG proposals

- 3.1. There is little change in impact on air quality from the construction. Construction on the Phoenix Place development is likely to be of similar scale in both the RMG and MPA proposals.
- 3.2. The RMG proposals state that:
'The roads within the network to be modelled are relatively wide and existing buildings are not considered to be tall. The proposed buildings within the Development Site, while being tall, would not cause any new canyons to be created with the existing buildings on the opposite side of Calthorpe Street, Royal Mail Group, Mount Pleasant, Farringdon Road, Phoenix Place or Gough Street.' (Mount Pleasant Environmental Statement Vol 4A Appendix 11.2, 1 of 2; 1.14)

A canyon is defined in the RMG proposals as follows:

'LAQM.TG(09) identifies a street canyon "as narrow streets where the height of buildings on both sides of the road is greater than the road width." (Mount Pleasant Environmental Statement Vol 4A Appendix 11.2, 1 of 2; 1.13)

- 3.3. There are no new street canyons created in the MPA proposals. Air quality impact in the MPA proposals is therefore likely to be similar to those in the RMG proposals.

4. Mount Pleasant Association –changes in impact on Air Quality.

- 4.1. The MPA application is designed to be car free. This removes the issue highlighted in the RMG application of car parks being 'emissions sources' which is included in RMG modelling. It therefore contributes towards evidence of a higher air quality in the MPA proposals compared to the RMG proposals.
- 4.2. The MPA proposals include a strong focus on making streets pedestrian and cycle-centric which has positive impact on air quality. Elements of this approach include.
- 4.2.1. The MPA proposals include Phoenix Place forming part of the proposed Cycle Superhighway linking Kings Cross with Elephant and Castle.
- 4.2.2. Abundant cycle storage space being provided in the basement of the CRTBO proposal.

- 4.2.3. The MPA proposals creating a Car-Free Development. The site has exceptional access to public transport and cycle facilities, together with the range of shops and services in the central London location. The site is recognised as a Low Parking Provision Area where Camden would expect car-free development. For this reason, the development is proposed to be car-free with the exception of disabled parking, of which six spaces will be provided through on-street parking.
- 4.2.4. Phoenix Place is specifically designed to cease being the 'rat run' it is now and instead to be designed for pedestrian and cyclist movement.
- 4.2.5. A minimum of 125 secure cycle parking spaces will be available at lower ground floor level for use by residents;

5. Conclusions

- 5.1. There is no evidence that the MPA proposals will have a significant negative impact on air quality.
- 5.2. There is evidence, particularly through the focus on pedestrian and cycling transport, and the discouragement of car transport, that the MPA proposals will contribute more positively towards higher air quality.
- 5.3. Due to the high existing emissions and existing air quality in the area, the MPA's proposals can be considered to have an insignificant impact upon air quality.