# Technical Note

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Project Reference 43-67 High Street, Yiewsley

6-7 Lovers Walk
Brighton, East Sussex
BN1 6AH
T +44 1273 546 800

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| S. Lees | SKL | 2025-04-15 |

# Air Quality Technical Note

1.1 This air quality technical note has been prepared in response to post-stage 1 comments made by the GLA in relation to the Air Quality Assessment (AQA) for 43-67 High Street, Yiewsley (ref. JAR03313, dated 01/06/2023). The GLA made a total of five post-stage 1 comments in relation to RPS' AQA.

1.2 RPS has addressed these comments below.

1.3 ***GLA Comment**: "It should be noted given the length of time since the original submission, some information in the AQA is now out of date. Baseline information in the original assessment only considers monitoring data to 2019. It would be preferable to consider updated monitoring data, however it is acknowledged this is not likely to affect the overall outcomes of the assessment."*

RPS previously presented monitoring data in the borough for data up to 2019 as part of the AQA, due to the impacts of the COVID-19 response. RPS has located the London Borough of Hillingdon's latest 2024 Annual Status Report (presenting data up to 2023).

**Table 1: Comparison of Concentrations**

| Monitor Name | Pollutant | 2019 Concentration ($\mu g.m^{-3}$) | 2023 Concentration ($\mu g.m^{-3}$) |
|---|---|---|---|
| HIL | $NO_2$ | 45 | 25 |
| HILL19 | | 34.6 | 26.2 |
| HILL20 | | 36.6 | 29.2 |
| HILL21 | | 32.3 | 24.5 |

| Monitor Name | Pollutant | 2019 Concentration ($\mu g.m^{-3}$) | 2023 Concentration ($\mu g.m^{-3}$) |
|---|---|---|---|
| HILL29 | | 32.6 | 24.1 |
| HIL4 | $PM_{10}$ | 14 | 12 |
| | $PM_{2.5}$ | 5 | 6 |
| Defra Mapped | $NO_2$ | 24.4 (2018 basemap) | 18.3 (2021 basemap) |
| | $PM_{10}$ | 17.5 (2018 basemap) | 13.9 (2021 basemap) |
| | $PM_{2.5}$ | 11.9 (2018 basemap) | 8.4 (2021 basemap) |

There has been a marked reduction in baseline pollutant concentrations when comparing data from 2019 and 2023, with the single exception of monitored $PM_{2.5}$ concentrations at HIL4. On this basis, the baseline concentrations considered within the AQA are considered to be conservative and, therefore, the AQA likely overpredicts concentrations at sensitive receptors.

1.4 ***GLA Comment**: "The dust risk assessment was conducted in accordance to 2014 SPG / 2014 IAQM guidance. Updated IAQM guidance was published in 2024. It is recognised the 2024 guidance was published after to the completion of the original 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. It is acknowledged the overall dust risk classification is not expected to change under the 2024 IAQM guidance, in which case this approach (i.e. using the 2014 SPG) is acceptable. However if it were to change then the assessment should be updated."*

The IAQM *'Guidance on the assessment of dust from demolition and construction'* was updated in early 2024. The 2024 guidance redefines the dust emission magnitudes for Demolition, Earthworks, Construction and Trackout, with the magnitudes being less conservative than within the 2014 iteration of the guidance in some cases (e.g. earthworks and trackout). Having reviewed the updated 2024 guidance document, it is considered that there would be no material change to the overall conclusions of the dust risk assessment in the AQA report.

1.5 ***GLA Comment**: "Consideration should be given to the Mayor of London $PM_{2.5}$ target of 10 $\mu g/m^3$. While this target is not statutory, it is a stated Mayoral ambition. Whilst this has not been directly referenced in the AQA, there is some consideration of the WHO guidelines."*

The RPS 2023 AQA predicted that the highest $PM_{2.5}$ concentration at the proposed development would be 12.8 $\mu g.m^{-3}$. A background concentration of 11.9 $\mu g.m^{-3}$ from the 2018 Defra mapped predicted concentrations was used in the assessment. The current 2021 Defra mapped predicted concentration at the proposed development site is 8.4 $\mu g.m^{-3}$, which is 3.5 $\mu g.m^{-3}$

lower than the background concentration applied in the AQA. If this reduced background concentration is applied to the predicted onsite concentration results, there would be no predicted concentrations greater than the Mayor of London's $PM_{2.5}$ target of 10 $\mu g.m^{-3}$.

1.6 ***GLA Comment**: "The inclusion of a figure demonstrating the location of local monitoring sites in relation to the proposed development / modelled roads would be beneficial."*

Figure 1 below has been prepared showing the location of the background monitors in relation to the proposed development site.

**Figure 1: Location of Background Monitors**