

# **AIR QUALITY NEUTRAL (AQN) STATEMENT**

260 Coombe Lane, Raynes Park, London SW20 0RW, UK

Demolition of the existing bungalow, and erection of two-storey residential building with accommodations at the basement and roof space levels comprising six (6) self-contained flats

January 2024

## A. INTRODUCTION

- A.1 This Air Quality Neutral Assessment has been prepared to accompany a planning submission to the London Borough of Merton in respect to the proposed development at 260 Coombe Lane, Raynes Park, London SW20 0RW.
- A.2 The property is currently a two-bedroom detached bungalow, and a detached 1x car garage sited on a triangular lot next to the junction of Coombe Lane and Cambridge Road.
- A.3 Pre-Application Advice (ref: 23/P1125) was initially sought for a similar proposed development. The same scheme has been submitted in this planning application, while also addressing all of the concerns raised by the case officer during Pre-Application Advice.
- A.4 This application proposes the demolition of the existing bungalow and garage, and the erection of a two-storey, detached residential building with accommodations at the basement and roof space levels comprising six (6) self-contained flats (2-3b4p, 3-2b3p, and 1-1b1p) and six off-street car parking provisions.
- A.5 The following description of this planning application is:
- Demolition of the existing bungalow, and erection of two-storey residential building with accommodations at the basement and roof space levels comprising (6) six self-contained flats**
- A.6 It is understood that the London Borough of Merton (LBM) have stated they are satisfied that a full air quality assessment is not required for this development. However, an Air Quality Neutral Assessment showing at least compliance with the Air Quality Neutral London Plan Guidance 2023 being met should be submitted.

### Site and Surroundings

- A.7 The application site is situated in the London Borough of Merton administrative area, within the policy area of Raynes Park. The site currently consists of a two-bedroom detached property, is in use as a dwellinghouse, and will be accessed directly from Coombe Lane. It has a front and back garden with an existing single-storey detached garage along the right side of the property boundary.
- A.8 The area surrounding the site is almost entirely residential consisting of two-storey detached and semi-detached houses of varying architectural styles. Most of which have converted their loft into habitable spaces as evidenced by existing roof dormer additions and rooflight installations.
- A.9 The entire London Borough of Merton is declared as an Air Quality Management Area (AQMA).

## B. AIR QUALITY NEUTRAL ASSESSMENT

### Introduction

- B.1 The London Plan requires that all developments are 'Air Quality Neutral' to ensure proposals do not lead to further deterioration of existing poor air quality. In order to support the policy, guidance<sup>1</sup> has been produced on behalf of the Greater London Area (GLA). The document provides a methodology for determining potential emissions from a development and benchmark values for comparison purposes. Where the benchmark is exceeded then action is required, either locally or by way of off-setting.
- B.2 The GLA have recently issued a consultation draft update to the existing guidance. The document<sup>2</sup> provides a revised methodology for determining potential emissions from a development and should be used as a material consideration when undertaking an Air Quality Neutral Assessment.
- B.3 The Air Quality Neutral Assessment for the Proposed Development is outlined below.

### Proposal as Minor Development

- B.4 The London Plan Guidance (LPG) on Air Quality Neutral (AQN) states that minor developments will likely not be required to conduct a full air quality assessment, provided that the proposal for a dwelling:
- is only between one and nine inclusive in number;
  - has a site area of less than 0.5 hectares; and
  - has floor space less than 1,000 sqm.
- B.5 The proposal is only for six (6) flats with a site area of 588.39 sqm, and a gross floor space of 454.27 sqm. All of which complies with the above requirements, thereby constituting as minor development for AQN purposes.

### Building Emissions Benchmark

- B.6 The simplified procedure for Building Emissions Benchmark (BEB) in 3.1.1 and 3.1.2 of the LPG on AQN states that minor developments are assumed to meet the BEB if:
- the new heating system is a heat pump or other zero emission heat source;
  - the new heating system is a gas boiler with NO<sub>x</sub> emissions rated at less than 40 mg/kWh; or
  - the development is connecting to an existing heat network.

<sup>1</sup> Air Quality Neutral Planning Support Update: GLA 80371, Air Quality Consultants and Environ, 2014.

<sup>2</sup> London Plan Guidance - Air Quality Neutral, Consultation Draft, GLA, 2021.

- B.7 The proposed development will utilise an Air Source Heat Pump, thereby should be considered to meet the BEB.

## **Transport Emissions Benchmark**

- B.8 The simplified procedure for Transport Emissions Benchmark (TEB) in 4.1.1, and 4.1.2 of the LPG on AQN states that minor developments with new parking are assumed to meet the TEB if the policies in T6 and T6.1 to T6.5 of the London Plan are not exceeded.
- B.9 London Plan Policy T6.1 (Residential Parking) states that the maximum residential car parking provision for sites within Outer London with a PTAL of 0-1 is 1.5 spaces per dwelling, regardless of number of beds per dwelling. It further notes that for three-bed dwellings, Boroughs should consider standards that allow for higher levels of provision where there is clear evidence that this would support additional family housing.
- B.10 Given the proposed schedule of accommodation being 2-3b4p, 3-2b3p, and 1-1b1p flats, the total maximum car parking provision is nine (9) for the entire property.
- B.11 This demonstrates that the development proposal should be considered acceptable by the Merton Council, thereby rendering the proposed development to meet the TEB.

## **Summary**

- B.12 The LPG on AQN further states that a development must meet both the BEB and TEB in order to be Air Quality Neutral.
- B.13 This proposal, as earlier demonstrated to be a minor development, meets both the BEB and TEB, and is therefore Air Quality Neutral in accordance to GLA guidance.

## **C. CONCLUSION**

- C.1 An Air Quality Neutral Assessment has been carried out in support of the proposed development at 260 Coombe Lane, Raynes Park, London SW20 0RW.
- C.2 It is understood that whilst a full air quality assessment was not necessary for the Proposed Development, a statement should be produced outlining the Site's compliance with AQN London Plan Guidance.
- C.3 The proposal meets both Building Emissions Benchmark and Transport Emissions Benchmark, as it will utilise an Air Source Heat Pump, and the proposed off-street car parking provisions would not exceed the maximum limits in the London Plan 2021.
- C.4 Based on the above assessment results, the Proposed Development is therefore considered Air Quality Neutral, in accordance with the GLA guidance.