

**United Kingdom Holocaust Memorial  
and Learning Centre**

Environmental Statement (Volume 5)  
Appendix E Air Quality  
December 2018

The Secretary of State for Housing Communities and Local Government

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# Appendix E. Air Quality

## E.1. Glossary of Air Quality terms

**Table E-1 - Glossary of Terms**

Glossary	Definition
AQMA	Air Quality Management Area.
BEB	Building Emissions Benchmark.
CoCP	Code of Construction Practice.
Defra	Department for Environment, Food and Rural Affairs.
Dust	Dust comprises particles typically in the size range 1-75 micrometres ( $\mu\text{m}$ ) in aerodynamic diameter and is created through the action of crushing and abrasive forces on materials.
GLA	Greater London Authority.
HDV/HGV	Heavy Duty Vehicle/Heavy Goods Vehicle.
LAEI	London Atmospheric Emissions Inventor.
NRMM	Non-Road Mobile Machinery.
NO <sub>2</sub>	Nitrogen dioxide.
NO <sub>x</sub>	Nitrogen oxides.
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter of less than 10 micrometres.
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter of less than 2.5 micrometres.
Trackout	The transport of dust and dirt from the construction / demolition site onto the public road network, where it may be deposited and then re-suspended by vehicles using the network. This arises when heavy duty vehicles (HDVs) leave the construction / demolition site with dusty materials, which may then spill onto the road, and/or when HDVs transfer dust and dirt onto the road having travelled over muddy ground on site.
$\mu\text{g}/\text{m}^3$	Micrograms per cubic metre. A measure of concentration in terms of mass per unit volume. A concentration of $1\mu\text{g}/\text{m}^3$ means that one cubic metre of air contains one microgram (millionth of a gram) of pollutant.
WCC	Westminster City Council.

## E.2. Policy and Guidance

### E.2.1. UK Air Quality Strategy

The Government's policy on air quality within the UK is set out in the Air Quality Strategy for England, Scotland, Wales and Northern Ireland (AQS)<sup>1</sup>. The AQS provides a framework for reducing air pollution in the UK with the aim of meeting the requirements of European Union legislation.

The AQS also sets standards and objectives for nine key air pollutants to protect health, vegetation and ecosystems. These are benzene (C<sub>6</sub>H<sub>6</sub>), 1,3 butadiene (C<sub>4</sub>H<sub>6</sub>), carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO<sub>2</sub>), particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), sulphur dioxide (SO<sub>2</sub>), ozone (O<sub>3</sub>), and polycyclic aromatic hydrocarbons (PAHs). The standards and objectives for the pollutants considered in this assessment are given in Table 7-2.

The air quality standards are levels recommended by the Expert Panel on Air Quality Standards (EPAQS) and the World Health Organisation (WHO) with regards to current scientific knowledge about the effects of each pollutant on health and the environment.

The air quality objectives are medium-term policy based targets set by the Government, which consider economic efficiency, practicability, technical feasibility and timescale. Some objectives are equal to the EPAQS recommended standards or WHO guideline limits, whereas others involve a margin of tolerance, i.e. a limited number of permitted exceedances of the standard over a given period.

For the pollutants considered in this assessment, there are both long-term (annual mean) and short-term standards. In the case of NO<sub>2</sub>, the short-term standard is for a 1-hour averaging period, whereas for PM<sub>10</sub> it is for a 24-hour averaging period. These periods reflect the varying impacts on health of differing exposures to pollutants, for example temporary exposure on the pavement adjacent to a busy road, compared with the exposure of residential properties adjacent to a road.

The AQS contains a framework for considering the effects of a finer group of particles known as 'PM<sub>2.5</sub>' as there is increasing evidence that this size of particles can be more closely associated with observed adverse health effects than PM<sub>10</sub>. Local Authorities are required to work towards reducing emissions/concentrations of particulate matter within their administrative area.

### E.2.2. National Planning Policy

#### E.2.2.1. National Planning Policy Framework

The Government's overall planning policies for England are described in the National Planning Policy Framework<sup>2</sup>, which was updated in July 2018. The core underpinning principle of the Framework is the presumption in favour of sustainable development, defined as:

*"... meeting the needs of the present without compromising the ability of future generations to meet their own needs"*

One of the three overarching objectives of the NPPF is that planning should *'to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'*

In relation to air quality, the following paragraphs in the document are relevant:

- Paragraph 54, which states 'Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.'
- Paragraph 103, which states '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

<sup>1</sup> Department for Environment, Food and Rural Affairs (2007). The Air Quality Strategy for England; Scotland, Wales and Northern Ireland Volumes 1 and 2. Defra: London.

transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.;

- Paragraph 170, which states ‘Planning policies and decisions should contribute to and enhance the natural and local environment by: ...e) 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 should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.;
- Paragraph 180, which states ‘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.’
- Paragraph 181, which states ‘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.’;
- Paragraph 183, which states ‘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.’

### E.2.3. Regional Planning Policy

#### E.2.3.1. The London Plan: Spatial Development Strategy for Greater London (consolidated with alterations since 2011) 2016<sup>3</sup>

Policy 7.14 of the London Plan is specific to the improvement of air quality and states that development proposals should:

- *“minimise increased exposure to existing poor air quality and make provision to address local problems of air quality”;*
- *“promote sustainable design and construction in order to reduce emissions from the demolition and construction of buildings following the best practice guidance in the GLA and London Councils’ ‘The control of dust and emissions from construction and demolition”;*
- *“be at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality”;*
- *“ensure that where provision needs to be made to reduce emissions from a development, this is usually made on site”; and*
- *“where the development requires a detailed air quality assessment and biomass boilers are included, the assessment should forecast pollutant concentrations. Permission should only be granted if no adverse air quality impacts from the biomass boiler are identified.”*

#### E.2.3.2. The Mayor’s Air Quality Strategy for London

In 2010 the GLA/Mayor of London published a new Mayor’s Air Quality Strategy for London<sup>4</sup>. This strategy is focused on improving London’s air quality. It also explains the current air quality experienced across London and gives predictions of future levels of pollution. The sources of

<sup>3</sup> Mayor of London/Greater London Authority (2016). The London Plan: Spatial Development Strategy for Greater London Consolidated with alterations since 2011.

<sup>4</sup> Mayor of London/Greater London Authority (2010). Cleaning London’s Air: The Mayor’s Air Quality Strategy.

pollution are outlined and a comprehensive set of policies and proposals are set out that will improve air quality in the London Boroughs.

The Strategy sets out a framework for delivering improvements to London's air quality and includes measures aimed at reducing emissions from transport, homes, offices and new developments, promoting smarter more sustainable travel, as well as raising awareness of air quality issues.

The Strategy includes a policy which states: *"New developments in London shall as a minimum be 'air quality neutral' through the adoption of best practice in the management and mitigation of emissions"*.

## E.2.4. Local Planning Policy

### E.2.4.1. Westminster City Council Local Plan

Westminster's City Plan<sup>5</sup> was adopted in November 2016 and sets out the strategic vision and future plan for the City.

Policy S31 outlines the council's key air quality objectives:

- *"The council will require a reduction of air pollution, with the aim of meeting the objectives for pollutants set out in the national strategy";*
- *"Developments will minimise emissions of air pollution from both static and traffic-generated sources"; and*
- *"Developments that include uses that are more vulnerable to air pollution (Air Quality Sensitive Receptors) will minimise the impact of poor air quality on occupants through the design of the building and appropriate technology".*

### E.2.4.2. City of Westminster Air Quality Manifesto

The City of Westminster Air Quality Manifesto<sup>6</sup>, published in March 2018, sets out four key priorities aimed at cleaning up the air within the City of Westminster. It also includes a series of pledges setting out the Council's commitment to make Westminster a cleaner, greener city, these include:

1. Reducing or cleaning dirty journeys and creating better infrastructure for electric and low emission vehicles by:
2. Extending the diesel surcharge on pay and display parking across the city to help discourage diesel vehicles from polluting Westminster;
3. Asking those who own more than one car to pay extra for their parking permits, unless they are driving low emission vehicles; and
4. Continuing to invest in more ways to encourage the use of electric vehicles throughout the city.
5. Placing emissions and pollution in the forefront of decision making on public spaces and buildings and encouraging all those who shape spaces and buildings to do likewise through:
6. Tackling emissions from all types of buildings, new and old, to reduce air pollution; and
7. Creating low emission zones around schools;
8. Making cleaner and environmentally-friendly options easier for our residents and changing behaviour including:
  - Supporting residents to monitor air quality in their neighbourhoods;
  - Supporting everyone in Westminster to increase recycling and reduce the use of limited resources; and
  - Continuing to campaign against engine idling.
- Moving the air quality agenda forward through thought leadership and innovation through:
  - Welcoming green technology and become a centre of leadership for green innovation; and
  - Inviting new ideas from around the world to help inform our own work and to influence government.

<sup>5</sup> City of Westminster (2016). Westminster City Plan.

<sup>6</sup> City of Westminster (2018). Air Quality Manifesto.

## E.2.5. Emerging Planning Policy

### E.2.5.1. Draft London Plan

- A draft new London Plan, to shape the way London develops in the next 20-25 years, was published by the Mayor of London for consultation in December 2017. Consultation on the new Plan concluded in March 2018.

### E.2.5.2. Westminster Air Quality Strategy and AQAP

- At the end of 2018, WCC will publish a new Air Quality Strategy and AQAP. These will contain the pledges contained within WCC's Air Quality Manifesto (detailed above) and more.

## E.2.6. Guidance

A summary of the publications referred to in the undertaking of this assessment is provided below.

### E.2.6.1. London Local Air Quality Management Technical Guidance

The Mayor of London has published guidance for use by the London Boroughs in their review and assessment work. This guidance, referred to in this document as LLAQM.TG (16)<sup>7</sup>, has been used where appropriate in the assessment presented herein.

### E.2.6.2. Local Air Quality Management Review and Assessment Technical Guidance

The Department for Environment, Food and Rural Affairs (Defra) has published technical guidance for use by local authorities outside of their London Boroughs in their review and assessment work<sup>8</sup>. This guidance, referred to in this document as LAQM.TG16, has been used with respect to the methodology used in the assessment of operational stage effects because LLAQM.TG (16) does not include suitable guidance on the approach that should be taken.

### E.2.6.3. Land Use Planning and Development Control: Planning for Air Quality

Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) have published guidance<sup>9</sup> that offers comprehensive advice on: when an air quality assessment may be required; what should be included in an assessment; how to determine the significance of any air quality impacts associated with a development; and, the possible mitigation measures that may be implemented to minimise these impacts.

### E.2.6.4. Guidance on the Assessment of Dust from Demolition and Construction

This document<sup>10</sup> published by the IAQM was produced to provide guidance to developers, consultants and environmental health officers on how to assess the impacts arising from construction activities. The emphasis of the methodology is on classifying sites according to the risk of impacts (in terms of dust nuisance, PM<sub>10</sub> impacts on public exposure and impact upon sensitive ecological receptors) and to identify mitigation measures appropriate to the level of risk identified.

### E.2.6.5. National Planning Practice Guidance - Air Quality

This guidance<sup>11</sup> provides guiding principles on how the planning process can take into account the impact of new development on air quality, and explains how much detail air quality assessments need to include for proposed developments, and how impacts on air quality can be mitigated. It also provides information on how air quality is considered by Local Authorities in both the wider planning context of Local Plans and neighbourhood planning, and in individual cases where air quality is a consideration in a planning decision.

<sup>7</sup> Mayor of London (2016). London Local Air Quality Management Technical Guidance (LLAQM.TG (16)).

<sup>8</sup> Defra (2016). Part IV of the Environment Act 1995 and Environment (Northern Ireland) Order 2002 Part III, Local Air Quality Management Technical Guidance (LAQM.TG16).

<sup>9</sup> Environmental Protection UK and Institute of Air Quality Management (version 1.2, 2017). Land Use Planning and Development Control - Planning for Air Quality.

<sup>10</sup> Institute of Air Quality Management (version 1.1, 2016). Guidance on the Assessment of Dust from Demolition and Construction.

<sup>11</sup> Department of Communities and Local Government (DCLG, 2014). National Planning Practice Guidance.

#### E.2.6.6. Mayor of London's Supplementary Planning Guidance for the Control of Dust and Emissions during Construction and Demolition

This Supplementary Planning Guidance (SPG)<sup>12</sup> builds on the voluntary guidance published in 2006 by the London Councils to establish best practice in mitigating impacts on air quality during construction and demolition work. The SPG incorporates more detailed guidance and best practice, and seeks to address emissions from Non-Road Mobile Machinery (NRMM) using a Low Emission Zone, which was introduced in September 2015.

The SPG provides a methodology for assessing the potential impact of construction and demolition activities on air quality following the same procedure as set out in the IAQM guidance. It then identifies the relevant controls and mitigation measures that should be put in place to minimise any adverse impacts, which need to be set out, in draft, in an air quality assessment report submitted with the planning application, and then formalised post submission as an Air Quality and Dust Management Plan. Details of site air quality monitoring protocols are also provided with varying requirements depending on the size of the site and the potential risk of adverse impacts.

#### E.2.6.7. Westminster Code of Construction Practice

The Westminster Code of Construction Practice (CoCP)<sup>13</sup> has been adopted to monitor, control and manage construction impacts on sites throughout the borough. It applies to all new basement schemes and to all other developments from September 2016 onwards.

The standards set out in the CoCP relate to demolition and construction works that have the potential to affect the environment, amenity and safety of local residents, businesses, the general public and the surroundings in the vicinity of the proposed works. It covers a broader range of issues in addition to air quality considerations including protection of vulnerable road users and employment and skills benefits, during construction.

#### E.2.6.8. Greater London Authority: Sustainable Design and Construction Supplementary Planning Guidance

Section 4.3 of this SPG<sup>14</sup> provides guidance on when a developer will be required to undertake an air quality assessment, looks at how design and transport measures can be used to minimise emissions to air, and sets out emissions standards for combustion plant.

The SPG also contains guidance on assessing the air quality neutrality of a Proposed Development in order to comply with the London Plan and the Mayor's Air Quality Strategy. Air Quality neutral benchmarks for both transport and buildings NO<sub>x</sub> and PM<sub>10</sub> emissions are provided within the SPG.

Developments that do not exceed these benchmarks (considered separately) will be 'air quality neutral', whilst developments that exceed the benchmarks after appropriate on-site mitigation measures have been incorporated will be required to off-set any excess in emissions off site. This can be achieved by providing NO<sub>x</sub> and PM abatement measures near the development, such as: green planting/walls and screens, with special consideration given to planting that absorbs or suppresses pollutants; upgrade or abatement work to combustion plant; retro-fitting abatement technology for vehicles and flues; and exposure reduction. These measures can be secured by condition or Section 106 contribution. Air quality monitoring is not eligible for funding as it is not considered to contribute to actual air quality improvements.

#### E.2.6.9. Air Quality Neutral Planning Support Guidance

The Air Quality Neutral Planning Support guidance<sup>15</sup> provides a methodology for assessing the air quality neutrality of Proposed Developments in London.

<sup>12</sup> Mayor of London (2014). The Control of Dust and Emissions during Construction and Demolition - Supplementary Planning Guidance.

<sup>13</sup> City of Westminster (2017). Westminster Code of Construction Practice.

<sup>14</sup> Mayor of London (2014). Sustainable Design and Construction - Supplementary Planning Guidance.

<sup>15</sup> AQC and ENVIRON UK Ltd (2014). Air Quality Neutral Planning Support.

## E.3. IAQM Construction Assessment Methodology

### E.3.1. Step 1: Screening the Need for a Detailed Assessment

An assessment will normally be required where there are:

- 'Human receptors' within 350m of the site boundary; or within 50m of the route(s) used by construction vehicles on the public highway, up to 500m from the site entrance(s); and/or
- 'Ecological receptors' within 50m of the site boundary; or within 50m of the route(s) used by construction vehicles on the public highway, up to 500m from the site entrance(s).

Where the need for a more detailed assessment is screened out, it can be concluded that the level of risk is "negligible".

### E.3.2. Step 2 - Step 2A - Define the Potential Dust Emission Magnitude

The following are examples of how the potential dust emission magnitude for different activities can be defined. (Note: that not all the criteria need to be met for a particular class). Other criteria may be used if justified in the assessment.

**Table E-2 - Examples of Human Receptor Sensitivity to Construction Phase Impacts**

Dust Emission Magnitude	Activity
Large	Demolition >50,000m <sup>3</sup> building demolished, dusty material (e.g. concrete), on-site crushing/screening, demolition >20m above ground level
	Earthworks >10,000m <sup>2</sup> site area, dusty soil type (e.g. clay), >10 earth moving vehicles active simultaneously, >8m high bunds formed, >100,000 tonnes material moved
	Construction >100,000m <sup>3</sup> building volume, on site concrete batching, sandblasting
	Trackout >50 HDVs out / day, dusty surface material (e.g. clay), >100m unpaved roads
Medium	Demolition 20,000 - 50,000m <sup>3</sup> building demolished, dusty material (e.g. concrete) 10-20m above ground level
	Earthworks 2,500 - 10,000m <sup>2</sup> site area, moderately dusty soil (e.g. silt), 5-10 earth moving vehicles active simultaneously, 4m - 8m high bunds, 20,000 -100,000 tonnes material moved
	Construction 25,000 - 100,000m <sup>3</sup> building volume, dusty material e.g. concrete, on site concrete batching
	Trackout 10 - 50 HDVs out / day, moderately dusty surface material (e.g. clay), 50 - 100m unpaved roads
Small	Demolition <20,000m <sup>3</sup> building demolished, non-dusty material (e.g. metal cladding), <10m above ground level, work during wetter months
	Earthworks <2,500m <sup>2</sup> site area, soil with large grain size (e.g. sand), <5 earth moving vehicles active simultaneously, <4m high bunds, <20,000 tonnes material moved, earthworks during wetter months

Dust Emission Magnitude	Activity
	Construction <25,000m <sup>3</sup> , non-dusty material (e.g. metal cladding or timber)
	Trackout <10 HDVs out / day, non-dusty soil, < 50m unpaved roads

### E.3.3. Step 2B – Define the Sensitivity of the Area

**Table E-3 - Sensitivity of the Area to Dust Soiling Effects**

Receptor Sensitivity	Number of Receptors	Distance from the Source			
		<20	<50	<100	<350
High	>100	High	High	Medium	Low
	10-100	High	Medium	Low	Low
	1-10	Medium	Low	Low	Low
Medium	>1	Medium	Low	Low	Low
Low	>1	Low	Low	Low	Low

**Table E-4 - Sensitivity of the Human Health Impacts**

Receptor Sensitivity	Annual Mean PM <sub>10</sub> Concentration (µg/m <sup>3</sup> )	Number of Receptors	Distance from the Source				
			<20	<50	<100	<200	<350
High	>32	>100	High	High	High	Medium	Low
		10-100	High	High	Medium	Low	Low
		1-10	High	Medium	Low	Low	Low
	28-32	>100	High	High	Medium	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	High	Medium	Low	Low	Low
	24-28	>100	High	Medium	Low	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	<24	>100	Medium	Low	Low	Low	Low
		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Medium	>32	>100	High	Medium	Low	Low	Low
		10-100	Medium	Low	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	28-32	>100	Low	Low	Low	Low	Low
		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	24-28	>100	Low	Low	Low	Low	Low
		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	<24	>100	High	Medium	Low	Low	Low
		10-100	Medium	Low	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
Low		>1	Low	Low	Low	Low	Low

**E.3.4. Step 2C – Define the Risk of Impacts**

The dust emissions magnitude determined at Step 2A should be combined with the sensitivity of the area determined at Step 2B to determine the risk of impacts without mitigation applied. For those cases where the risk category is ‘negligible’ no mitigation measures beyond those required by legislation will be required.

**Table E-5 - Risk of Dust Impacts**

Sensitivity of Surrounding Area	Dust Emission Magnitude		
	Large	Medium	Small
Earthworks and Construction			
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible

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

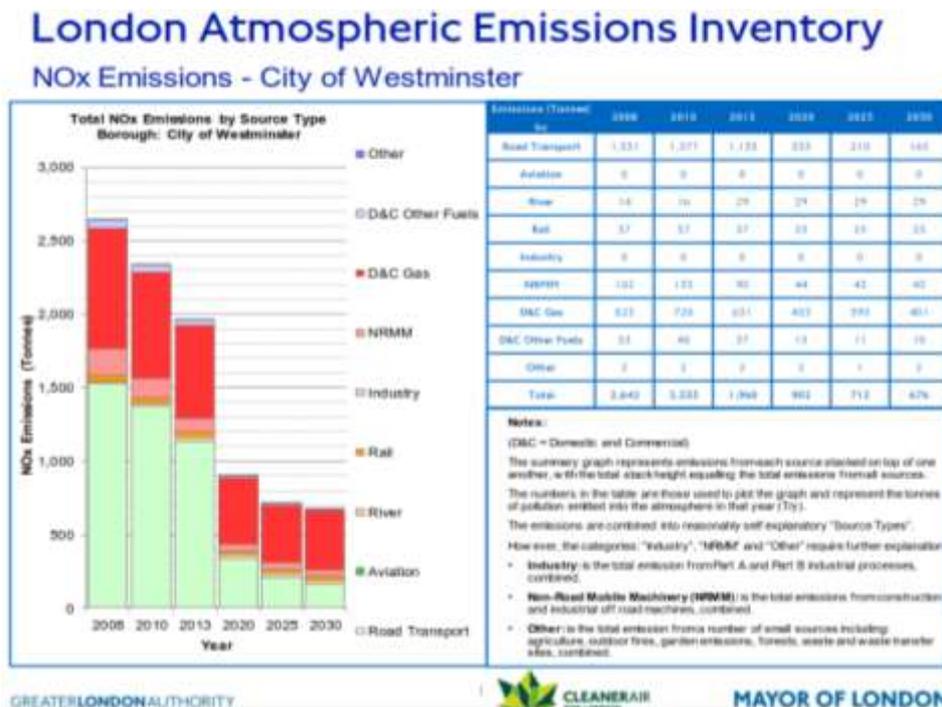
### E.3.5. Step 3: Site Specific Mitigation

Having determined the risk categories for each of the four activities it is possible to determine the site-specific measures to be adopted. These measures will be related to whether the site is considered to be a low, medium or high risk site. The IAQM guidance details the mitigation measures required for high, medium and low risk sites as determined in Step 2C.

### E.3.6. Step 4: Determine Significant Effects

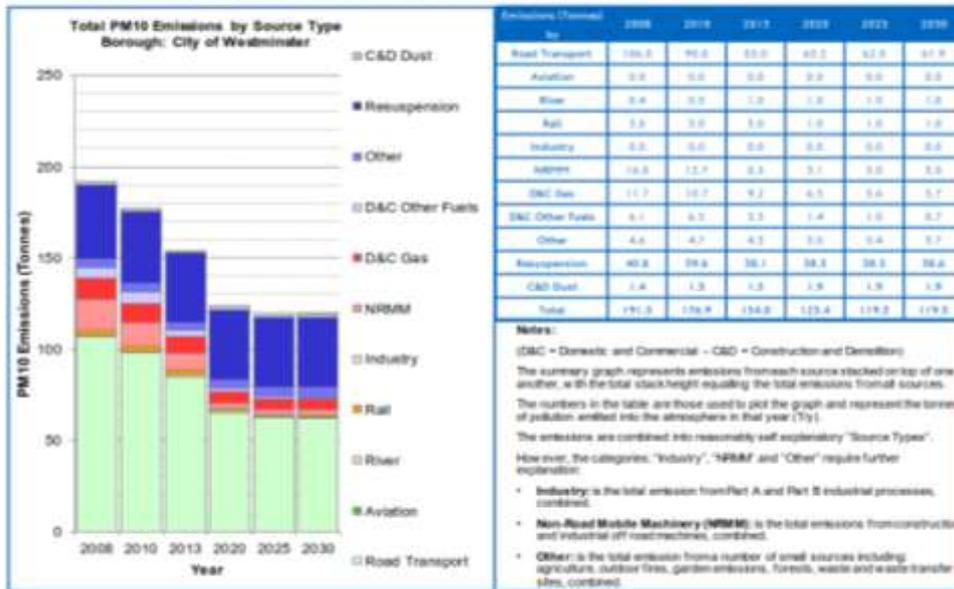
Once the risk of dust impacts has been determined in Step 2C and the appropriate dust mitigation measures identified in Step 3, the final step is to determine whether there are significant effects arising from the construction phase. For almost all construction activities, the application of effective mitigation should prevent any significant effects occurring to sensitive receptors and therefore the residual effect will normally be negligible.

## E.4. City of Westminster: LAEI Total Emissions Split by Source Sector



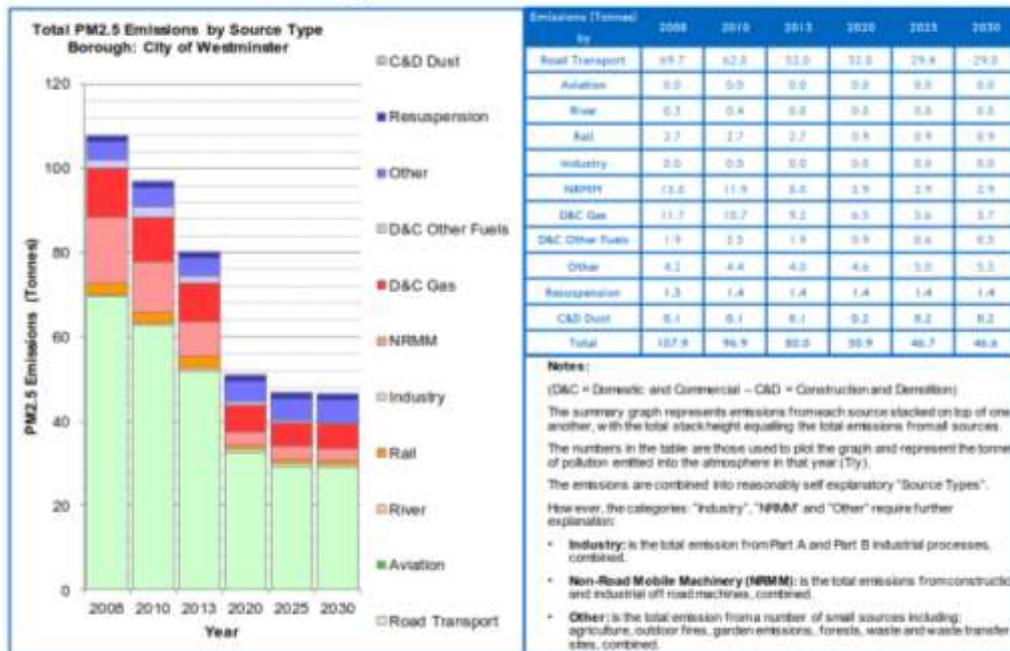
# London Atmospheric Emissions Inventory

## PM10 Emissions - City of Westminster

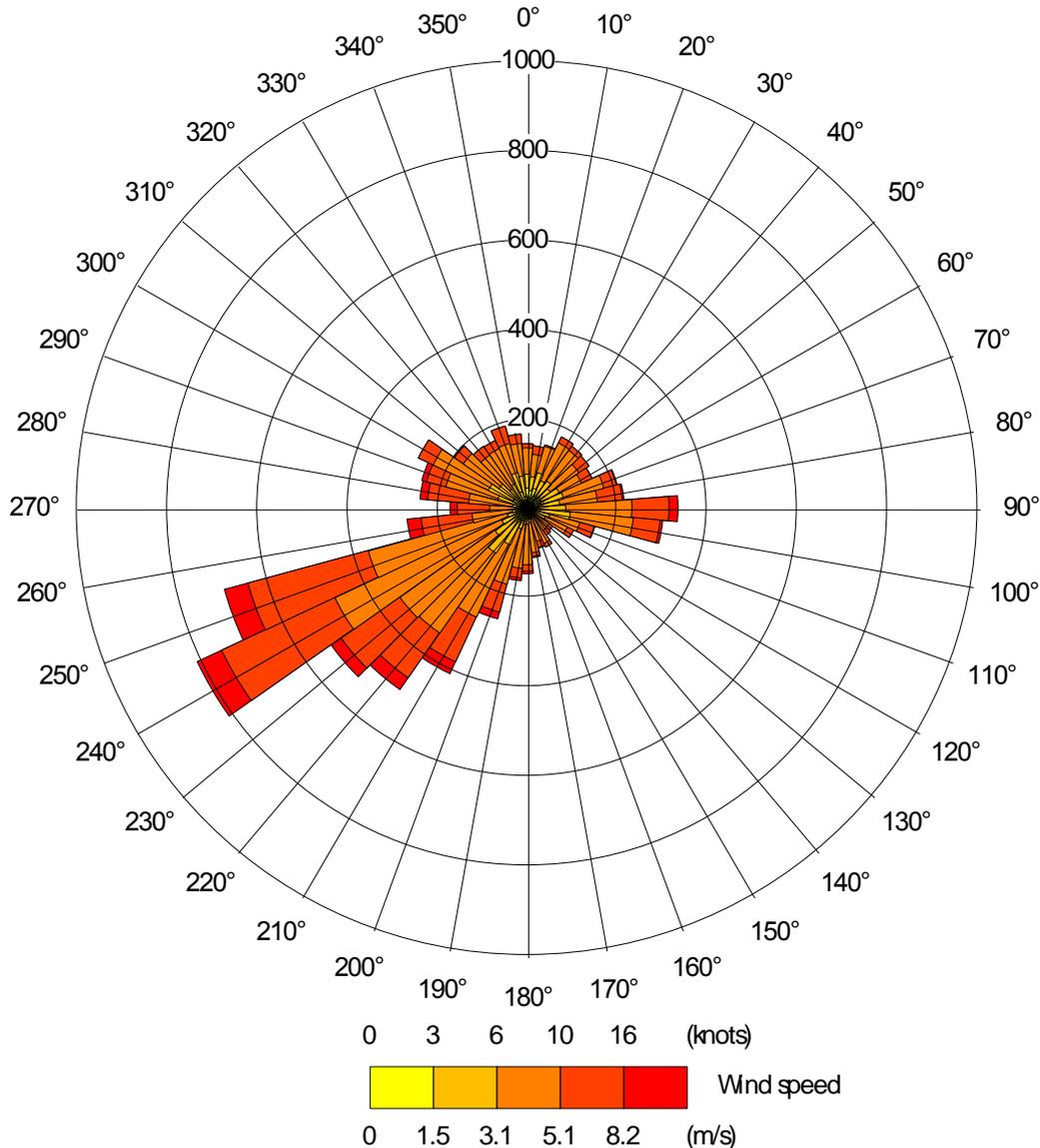


# London Atmospheric Emissions Inventory

## PM2.5 Emissions - City of Westminster



## E.5. Wind Rose London City Airport (2016)



- Educational establishments: Westminster School, Busy Bees at Westminster, Hatching Dragons Westminster, St Matthews CE Primary School, Harris Westminster Sixth Form, Millbank Academy, St Thomas Hospital London Medical School, London School of Business and IT, Fairley House School
- Places of worship: Emmanuel Evangelical Church, Westminster Abbey, St Margaret's Church, Westminster Baptist Church, Sacred Heart Catholic Church, St Matthews Westminster, Methodist Church (Stoney's Gate), Lambeth Palace
- Care/nursing homes: Anchor - Norton House care home, Bankhouse
- Recreation: there is a comprehensive footpath and cycle network covering the surrounding area, including routes through and adjacent the Scheme, which provide connections to the wider network and local facilities. The River Thames to the east provides opportunities for a range of water recreation and leisure pursuits
- Public transport: there are several bus stops along Millbank, west of the Scheme. Westminster Station is 400m to the north. Outside the core study area, Waterloo Railway and underground station is less than 1km to the north east; Victoria Station is just over 1km to the west. Vauxhall Railway and underground station, Pimlico, Lambeth North, Charing Cross, and Embankment are all within 1km, serving the residents, workers and visitors of the area

- Parking: Blue badge parking is possible along Millbank to the west of the Scheme, except the area covered by the Bus Lane. Cycle parking is also provided along Millbank, along with cycle hire facilities to the south

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