Construction/Demolition Management Plan

Pro-forma

Updated 23/04/2026 Version 3.3

Camden

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Revisions & additional material

Please list all iterations here:

Date	Version	Produced by
09.08.2024	1	Liongate Build
04.06.2026	2	Liongate Build
15.10.2026	3	Liongate Build

Additional sheets

Please note – the review process will be quicker if these are submitted as Word documents or searchable PDFs.

Date	Version	Produced by
15.10.2026	1	CMP Attachments
09.05.2024	1	Air Quality Report
08.08.2024	1	Noise Impact Assessment
08.08.2024	1	Construction Noise Assessment

Introduction

The purpose of a Construction Management Plan (CMP) is to help developers to minimise construction impacts and relates to all construction activity both on and off site that impacts on the wider environment.

It is intended to be a live document whereby different stages will be completed and submitted for application as the development progresses.

The completed and signed CMP must address the way in which any impacts associated with the proposed works, and any cumulative impacts of other nearby construction sites, will be mitigated and managed. The level of detail required in a CMP will depend on the scale and nature of development.

CMP development sites will be inspected by Camden's Site Planning Inspectors or nominated officers to assess compliance with the CMP. These inspections will consist of both planned and unplanned site visits for the duration of the works. Developers/contractors are required to provide access to sites for inspection and cooperate fully throughout the inspection process ensuring compliance with the CMP.

The approved contents of this CMP must be complied with unless otherwise agreed with the Council in writing. The project manager shall work with the Council to review this CMP if problems arise during construction. Any future revised plan must also be approved by the Council and complied with thereafter.

It should be noted that any agreed CMP does not prejudice or override the need to obtain any separate consents or approvals such as road closures or hoarding licences.

If your scheme involves any demolition, you need to make an application to the Council's Building Control Service. Please complete the "**Demolition Notice.**"

Please complete the questions below with additional sheets, drawings and plans where requested. Please only provide detail that is relevant to the question and provide responses that are as brief as possible.

Additional material may be appended to the main document, however large standalone files such as environmental reports must be submitted as separate files. These should be clearly referenced/linked to from the CMP.

Contact

1. Please provide the full postal address of the site and the planning reference relating to the construction works.

Address: 335 Euston Road, London NW1 3AD

Planning reference number to which the CMP applies: 2024/3497/P

2. Please provide contact details for the person responsible for submitting the CMP.

Name: Reza Hajhosseiny for Medical Team Limited

Address: 4 Quex Road, Kilburn, London, NW6 4PJ

Email: reza1989@gmail.com

Phone:

3. Please provide full contact details of the site project manager responsible for day-to-day management of the works and dealing with any complaints.

Name: Roman Fedyniak - EcoHomeLondon Ltd

Address: 30 Thurleston Avenue SM4 4BW

Email: info@ecohomelondon.co.uk

Phone: 07807 054500

4. Please provide full contact details of the person responsible for community liaison and dealing with any complaints from local residents and businesses if different from question 3. In the case of the Community Investment Programme (CIP), please provide the contact details of the Camden officer responsible.

Name: Roman Fedyniak - EcoHomeLondon Ltd

Address: 30 Thurleston Avenue SM4 4BW

Email: info@ecohomelondon.co.uk

Phone: 07807 054500

5. Please provide full contact details including the address where the main contractor accepts receipt of legal documents for the person responsible for the implementation of the CMP.

Name: Roman Fedyniak - EcoHomeLondon Ltd

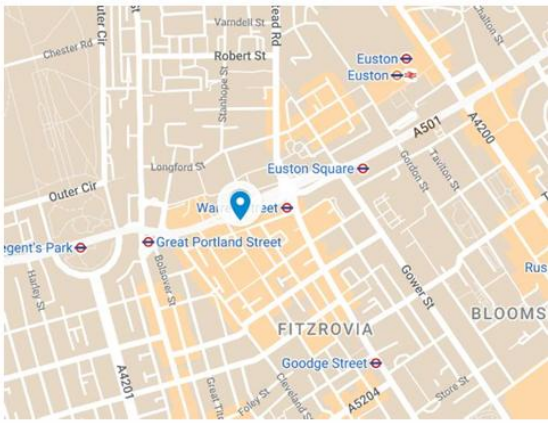
Address: 30 Thurleston Avenue SM4 4BW

Email: info@ecohomelondon.co.uk

Phone: 07807 054500

Site

6. Please provide a site location plan and a brief description of the site, surrounding area and development proposals for which the CMP applies.



The site, situated south of Euston Road in Central London, features a single storey building currently housing a shoe repair business (Class E use). It is positioned on the edge of the Euston Area Plan and falls within the Fitzrovia Area Action Plan. Adjacent to the Fitzroy Square Conservation Area, the site runs parallel to Warren Street, which is also part of this conservation area. Nearby, No. 341 Euston Road, at the corner with Fitzroy Street, and the Grade II listed buildings at Nos. 56 and 58-68 Warren Street are also prominent local landmarks.

7. Please provide a very brief description of the construction works including the size and nature of the development and details of the main issues and challenges (e.g. narrow streets, close proximity to residential dwellings etc).

The proposed project involves demolishing the existing single-storey retail unit and constructing a new three-storey building with a basement and roof level for use as a medical facility. The new structure will include a basement for MRI scans, a rear section of the ground floor for CT scans, and consulting rooms on the first and second floors. The existing building is 3.4 meters tall with a 5.0-meter-high parapet wall, while the new building will rise to 6.2 meters at the eaves and 8.9 meters at the top of the flat mansard roof, matching the height of the adjacent property at No. 337 Euston Road.

8. Please provide the proposed start and end dates for each phase of construction as well as an overall programme timescale.

The proposed construction start date is 27 October 2026. The basement works are expected to take approximately 26 weeks, followed by a further 10–14 months for completion of the remaining construction works. The overall construction programme is therefore anticipated to be approximately 16–20 months. The programme below is indicative and may be subject to minor changes as the works progress.

Construction stage	Start	End
Site setup and demolition	Oct-2026	Nov-2026
Basement excavation and piling	Nov-2026	May-2027
Sub-structure	May-2027	Jun-2027
Super-structure	Jun-2027	Jul-2027
Cladding	Jul-2027	Aug-2027
Fit-out, testing and commissioning	Aug-2027	Jun-2028

9. Please confirm the standard working hours for the site, noting that the standard working hours for construction sites in Camden are as follows. Please note that permitted delivery times differ from this as per section 19.

- 8.00am to 6pm on Monday to Friday
- 8.00am to 1.00pm on Saturdays subject to agreement with Camden
- No working on Sundays or public holidays

Please note that these are Camden's standard times. However, the times operated should be specific to the site and related to the type of work being carried out. Permitted working hours will be considered on a case-by-case basis and the Council reserves the right to reduce/amend these where necessary, including refusal of permission for Saturday working.

The working hours will be as stated above, and no work will be allowed on Saturdays since the site is within the CIA.

Community Liaison

Consultation is an important part of the CMP process. Camden requires the process to:

- Be separate to any previous engagement that may have taken place during the planning process and is specifically around construction impacts
- Take place before the submission of the first draft
- Provide a link to the draft CMP or email address where this can be requested, and to invite responses
- Provide contact information where the draft can be discussed
- Allow a minimum response time of 14 days
- Include formal proof of postage
- Take into consideration other sites in the immediate area and how cumulative impacts with those sites will be minimised
- To clearly outline the site address and nature of the works
- Demonstrate any changes to the proposed approach based on feedback
- Outline a construction working group where necessary
- Outline the intended follow-up ie. newsletters, email updates etc

The Council can advise on this where necessary. Please contact the Council if there is uncertainty over the need for highways changes to deliver the site before any engagement work is undertaken.

10. Consultation process

Letters introducing the contractor and outlining the works should be sent to affected parties. Please use the letter template which is provided in the Transport guidance section. Please ensure that ward councillors are emailed a copy of the letter. Ward councillor contact details can be found on the Camden website.

Where relevant/applicable, please ensure that letters are also sent to:

- Residents
- Businesses
- Neighbouring or nearby construction sites
- Resident groups or similar
- Neighbouring planning authorities where applicable

- Transport for London if the site impacts on bus movement/infrastructure, is located on the Strategic Route Network (SRN) or Transport for London Route Network (TLRN)
- Network Rail and/or London Underground where applicable
- High Speed 2 where applicable
- Emergency service where applicable

The Council can advise on the above if needed.

Please provide the following as part of the CMP submission in the appendices:

- A copy of the letter
- An address list or map showing the letter distribution area
- A summary of any responses received and any aspects of the proposed approach that has been modified to accommodate feedback.
- If a meeting has taken place to discuss construction impacts, please provide a list of attendees and minutes for the meeting.

Please provide a summary of the consultation process here ie. Dates of meetings, dates of letter distribution, whether any responses were received and a brief summary of these, other construction sites in the immediate vicinity, and where the relevant material has been appended.

A construction-specific community consultation will be undertaken prior to submission of the revised CMP.

A consultation letter will be distributed to the relevant surrounding residents, the three Ward Councillors, affected businesses and other applicable parties. The letter will provide access to the draft CMP through a QR code/link to the project consultation website.

The consultation is proposed to commence on 16 October 2026 and a minimum 14-day response period will be provided. Comments may be submitted through the consultation website or directly to the Main Contractor.

The Main Contractor contact details for the consultation are:

Roman Fedyniak, Project Manager
EcoHomeLondon Ltd
Telephone: 07807 054500
Email: info@ecohomelondon.co.uk

Following completion of the consultation period, the CMP will be updated to include a copy of the consultation letter, the recipient/address list, evidence of distribution and a summary of any comments received and how these have been addressed.

11. Construction Working Group

For large/high impact/particularly sensitive or contentious sites, it may be necessary to set up a construction working group.

If so, please provide details of the group that will be set up, the contact details of the person responsible for community liaison and how this will be advertised to the local community, and how the community will be updated on the upcoming works i.e. in the form of a newsletter/letter drop, or weekly drop in sessions for residents. Please ensure that adjacent or neighbouring construction sites are included as part of this.

- A community notice board will be placed at the site boundary to provide updates on progress, upcoming work, career opportunities, company profile, and safety and environmental information.
- Contact details will be displayed at the site boundary for information and complaints.
- Regular newsletter drops to neighbours

12. Schemes

Camden requires that all sites with CMPs are registered with the Considerate Constructors Scheme (CCS). Please note that Camden requires CCS site registration for the full duration of your project including additional CLOCS visits for the full duration of your project. The number of CLOCS visits should be based on your project duration and should continue throughout. A CCS site ID number must be provided rather than a company registration number.

Be advised that Camden is a Client Partner with the Considerate Constructors Scheme and has access to all CCS inspection and CLOCS monitoring reports undertaken by CCS.

Please provide your site CCS registration number.

CCS Site ID : The site has been registered with the Considerate Constructors Scheme. The site-specific CCS Site ID is currently awaited and will be inserted into the CMP once received.

Contact details will be attached to the front site hoarding, providing information on whom to contact. This list will include the names and phone numbers of staff members on site for neighbours or the public who may need to reach out.

13. Complaints

Please agree to maintain a complaints log which must be made available for inspection.

A complaints log will be maintained by the Main Contractor for the duration of the works and will be made available to Camden for inspection upon request.

Any complaints received will be recorded, investigated and responded to as soon as practicable.

Transport

Camden is a CLOCS Champion, and is committed to maximising road safety for Vulnerable Road Users (VRUs) as well as minimising negative environmental impacts created by motorised road traffic. As such, all vehicles and their drivers servicing construction sites within the borough are bound by the conditions laid out in the CLOCS Standard.

Please note that any off-site loading areas that need to obstruct a dedicated cycle facility – ie. cycle track/lane are likely to be required to maintain access to this between the hours of 08.00 – 09.30 and 4.30pm as a minimum.

This section requires details of the way in which you intend to manage traffic servicing your site, including your road safety obligations with regard to VRU safety. It is your responsibility to ensure that your principal contractor is fully compliant with the terms laid out in the CLOCS Standard. It is your principal contractor's responsibility to ensure that all contractors and sub-contractors attending site are compliant with the terms laid out in the CLOCS Standard.

Checks of the proposed measures will be carried out both by Camden compliance monitoring officers and also CCS monitors as part of your CLOCS monitoring visits through CCS to ensure compliance. Please refer to the CLOCS Standard when completing this section.

Please contact CLOCS@camden.gov.uk for further advice or guidance on any aspect of this section.

Please note that this section may also be referred to as a Construction Logistics Plan in the context of the CLOCS Standard.

CLOCS Contractual Considerations

14. Name of Principal contractor:

EcoHomeLondon Ltd

15. Please submit the proposed method for checking operational, vehicle and driver compliance with the CLOCS Standard throughout the duration of the contract.

The following will be checked to make sure compliance with the CLOCS Standard

Driver name, Date, Time, Vehicle Registration, Vehicle operator, FORS ID no. Evidence of SUD training for drivers of vehicles over 3.5t

Vehicles exceeding 3.5t:

- Class V + VI mirrors
- Working camera and close proximity sensor system with in-cab audible alarm (and rear camera for +7.5t rigid vehicles)
- Side under-run protection (both sides)
- Externally audible alert for vehicle turning left and reversing
- Vulnerable road user warning signage
- Route Check
- Last mile route taken
- Information about any collisions which occurred on journey to site.
- Confirm access allowed or if denied issue letter to driver.

16. Please confirm that you as the client/developer and your principal contractor have read and understood the CLOCS Standard and included it in your contracts.

I confirm that I have included the requirement to abide by the CLOCS Standard in my contracts to my contractors and suppliers, and that all drivers of vehicles over 3.5t will have undertaken safe urban driver training, and that all such vehicles will be fitted with additional driver vision aids and audible left turn alerts.

I also confirm that all suppliers will be made aware of agreed vehicle routing and delivery times as provided below.

Main contractor confirms that I have included the requirement to abide by the CLOCS Standard in my contracts to my contractors and suppliers.

Please contact CLOCS@camden.gov.uk for further advice or guidance on any aspect of this section.

Site Traffic

17. Construction traffic routing

Routes should be carefully considered and risk assessed, taking into account the need to avoid where possible any major cycle routes, schools/nurseries, and areas which attract high concentrations of pedestrians.

a. Please show vehicle approach and departure routes between the site and the Transport for London Road Network (TLRN). Please note that routes may differ for articulated and rigid HGVs.

Routes should be shown clearly on a map, with approach and departure routes clearly marked. If this is attached, use the following space to reference its location in the appendices.

Please see Appendix A: Vehicle Routes.

b. Please provide tracking/swept path drawings for constrained manoeuvres on both approach and departure routes.

Please see the vehicle tracking / swept path drawings provided within the Appendix B.

18. Construction traffic vehicle types and delivery times

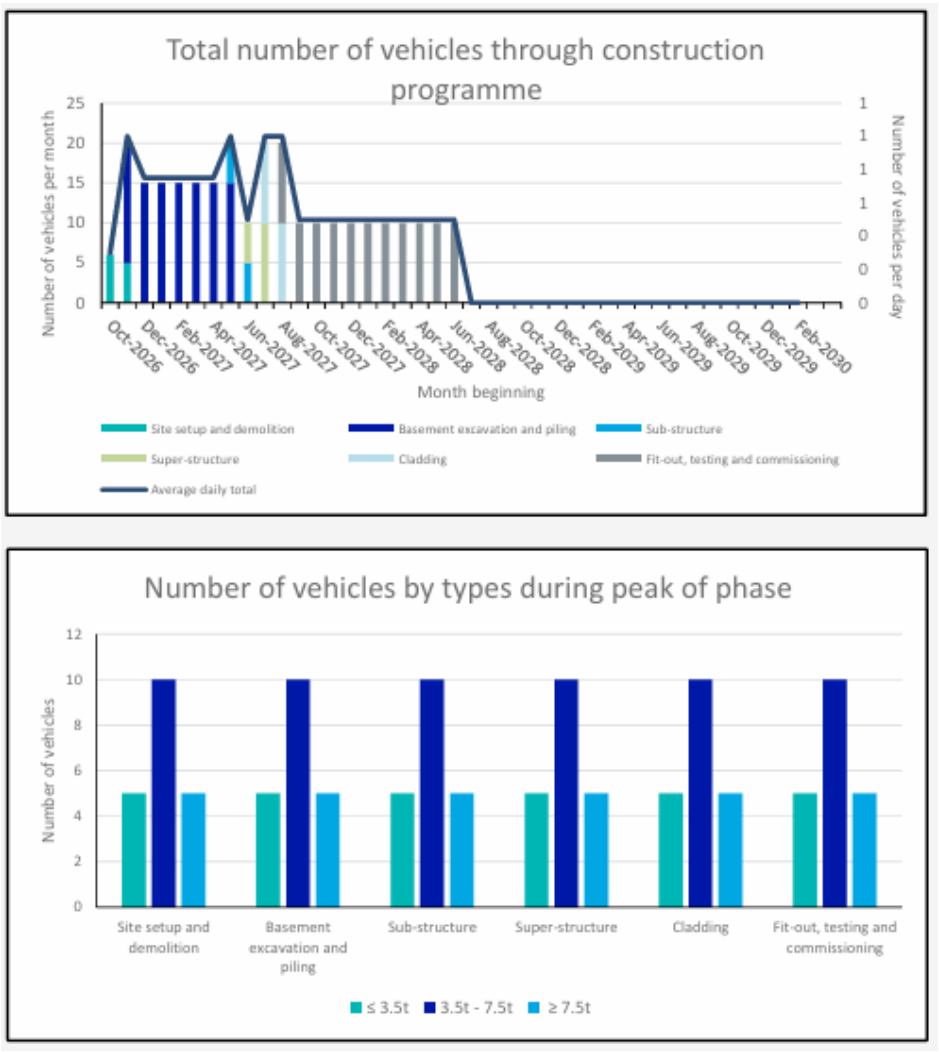
Construction vehicle movements should be restricted during the hours of 9.30am to 4.30pm on weekdays. If there is a school in the vicinity of the site or on the proposed approach and/or departure routes, then deliveries must be also be restricted during the hours of 3pm and 3.30pm on weekdays during term time.

Vehicles may be permitted to arrive at site prior to 08.00am subject to agreement with Camden. Where this is not possible, vehicles should arrive at 8.00am whereby they must be immediately admitted to site. Vehicles should then be held until 09.30 before being allowed to depart. If vehicles need to wait outside the site before 08.00 then they should only do so with prior agreement with Camden. Engines must be switched off during any agreed queuing/waiting on the highway.

a. Please provide details of the types of vehicles required to service the site and the approximate number of deliveries per day for each vehicle type during the various phases of the project.

For Example:
32t Tipper: 10 deliveries/day during first 4 weeks
Skip loader: 2 deliveries/week during first 10 weeks
Artic: plant and tower crane delivery at start of project, 1 delivery/day during main construction phase project
18t flatbed: 2 deliveries/week for duration of project
3.5t van: 2 deliveries/day for duration of project
Abnormal loads: 1 throughout, will be managed through usual, separate process

Vehicle frequencies are extracted from the CLP tool, and the months are indicative of the duration. Vehicle numbers may vary depending on collaboration with other sites and the project's start date.



b. 18 b: Please agree to restrict any HGV movements taking place between 08.00 - 09.30, and after 4.30 where possible. If this isn't possible please provide a reason here. Please note that if the site is in the vicinity of a school, then deliveries should also not be permitted during school pick-up times, which are generally 3.00 – 3.30/4.00pm.

Yes. HGV movements associated with the basement works will be scheduled between approximately 10:00 and 16:00, avoiding the restricted peak periods.

Vehicles using the designated loading area will be scheduled to minimise dwell time, with a maximum dwell time of 20 minutes.

c. Cumulative affects of construction traffic servicing multiple sites should be minimised where possible. Please provide details of other developments in the local area or on the route that might require deliveries coordination between two or more sites. This is particularly relevant for sites in very constrained locations.

The main contractor will communicate with other construction sites – if any.

d. Consideration should be given to the location of any necessary holding areas/waiting points for sites that can only accommodate one vehicle at a time/sites that are expected to receive large numbers of deliveries.

Please identify the locations of any off-site holding areas or waiting points on approach to site.

Please refer to question 21 if any parking bay suspensions will be required to provide a holding area.

In accordance with TfL requirements, parking bay suspensions will be obtained by the Main Contractor prior to commencement of the works. Deliveries will be managed through the approved loading arrangements and pre-booked delivery system.

e. Delivery numbers should be minimised where possible. Please investigate the use of construction material consolidation centres or reusing materials on site.

These have been reviewed and are not suitable for the project.

19. Construction vehicle loading

Vehicles entering and leaving the site should be carefully managed, using gates that are clearly marked. Traffic marshals must oversee all vehicle movements during site entry and exit. Marshals must control/stop all general traffic to permit this when necessary, particularly if the vehicle is reversing.

Traffic marshals, or site staff acting as traffic marshals, must hold the relevant qualifications required for directing large vehicles when reversing. This must be available for inspection during compliance monitoring visits. Marshals should be equipped with 'STOP – WORKS' signs (not STOP/GO signs) if control of traffic on the public highway is required during vehicle banking/loading. Marshals should have radio contact with one another where necessary.

a. Please state whether vehicles will load from within the site boundary or from the public highway, or a combination of both.

Loading and unloading will take place from the designated kerbside loading / parking bay area directly outside the site on Euston Road, subject to the relevant TfL and highway licensing requirements.

Please see the Appendix D for further details.

b. Please state whether lifting is to take place using a hoist or crane:

Materials will generally be transferred from delivery vehicles via the site frontage and overhead gantry arrangement.

A HIAB may be used for smaller/material deliveries where required, with materials offloaded onto the gantry and then transferred into the site. Excavation spoil will be transferred from the site using an extendable conveyor and loaded directly into a waiting grab lorry.

c. Please identify the locations of site access gates/vehicle loading areas.

Please see the Appendix D showing the site frontage, access arrangement and designated loading area.

d. Where applicable, please provide tracking/swept path drawings either for vehicles entering/departing from the site/off-site loading area, or for general traffic passing the stationary vehicle whilst it is stopped in the designated loading area.

Please see Appendix B: SPA Drawings for further details.

e. Please describe how site entry/exit or loading from the highway will be managed/overseen by traffic marshals, stating the number of marshals that will be required. If marshals need to be stationed away from site to manage vehicles on approach/departure, please also detail this here.

Please see Appendix D: Site Traffic Arrangements for further details.

f. Provision of wheel washing facilities should be considered if necessary. If so, please provide details of how this will be managed and any run-off controlled. Please note that wheel washing should only be used where strictly necessary, and that a clean, stable surface for loading should be used where possible.

There will be no wheel washing facilities.

Site set up

20. Site set-up and temporary highways changes

Please detail all temporary highways changes that will be required as part of the site set up – eg. Parking bay suspensions/changes to kerbside loading, temporary crossovers, lighting column relocation, gantry over the footway etc. Any accompanying drawings should be provided in the appendix. Please note that the impact on the public highway must be minimised as far as possible.

As part of the above, any detail drawings of the site up on the public highway should be presented as a scaled plan and must:

- Use the latest highways layout
- Show vehicle loading areas/vehicle site access points
- Show any structures that are to be located on the highway
- Show all parking/kerbside impacts
- Show all street furniture that is to be impacted/relocated including trees
- Show all relevant dimensions including footway and carriageway widths
- Show any relevant temporary pedestrian or cycle facilities such as temporary crossings

The following - where applicable - can be shown as part of the above or separately if preferred:

- Vehicle tracking into and out of site
- The site set up and any associated temporary traffic management measures must conform to the Safety at Street Works and Road Works Code of Practice.
- Numbers and locations of traffic marshals
- Scaffolding plans

Please note that any load-bearing gantries located on the highway may be subject to a separate assessment by our structures team. This will be advised upon when the CMP is reviewed by Camden.

a. Please list all relevant changes below and/or reference drawings in the appendix.

The site set-up will include site hoarding and scaffolding together with a heavy-duty scaffolding structure incorporating an overhead gantry at the site frontage.

The gantry arrangement will facilitate material transfers while maintaining protected pedestrian passage beneath.

Please see Appendix D: Site Traffic Arrangements and Appendix G: Staircase and Access Platform for further details.

b. Please confirm whether or not the footway will remain accessible to pedestrians during installation of temporary structures on the highway. If this is not possible then please state how pedestrian safety will be maintained during this period, providing details of any associated traffic/pedestrian management, including provision of safe crossing points.

The footway is proposed to remain accessible to pedestrians beneath the protective overhead gantry during the works and during material transfer operations.

Traffic marshals, barriers and signage will be used where required to maintain pedestrian safety.

21. Parking bay suspensions and temporary traffic orders

Parking bay suspensions should only be requested where absolutely necessary and can be provided using individual bay suspensions for up to 6 months, or a temporary traffic restriction (TTR) for periods exceeding 6 months. Information regarding parking suspensions can be found here. For periods greater than 6 months, or for any other changes to existing parking/loading/traffic restrictions on the highway, a Temporary Traffic Restriction (TTR) will be required. Please refer to the CMP guidance document which outlines the TTR process.

Please state clearly the number and type(s) of bays that will require individual suspension or removal using a TTR.

Please also state whether separate, short-term closures are anticipated for crane operations, utilities works etc.

This information can be presented as a drawing if preferred.

The Main Contractor will obtain the required parking bay suspensions between Nos. 329–337 Euston Road prior to commencement of the works.

22. Motor vehicle/cyclist/pedestrian diversions

Please note that footway closures are not permitted unless there is no alternative. Footway access must be maintained using a gantry or temporary walkway in the carriageway unless this is not possible. Where this is not possible, safe crossing points must be provided to ensure that pedestrian access is maintained. Where formal or controlled crossing points are to be suspended, similar alternative facilities must be provided. Camden reserves the right to require temporary formal/controlled crossing points in the event of any footway closures, and will always require as a minimum permanent-style, informal crossing points to be provided.

Please provide details of any diversion routes here, or present these in a drawing if preferred. All motor vehicle diversion routes should be presented in the form of a drawing showing the relevant signage.

There will be no traffic diversions.

23. Services

Please indicate if any changes to services are proposed to be carried out that would be linked to the site during the works (i.e. connections to public utilities and/or statutory undertakers' plant). Larger developments may require new utility services. If so, a strategy and programme for coordinating the connection of services will be required. If new utility services are required, please confirm which utility companies have been contacted (e.g. Thames Water, National Grid, EDF Energy, BT etc.) You must explore options for the utility companies to share the same excavations and traffic management proposals. Please supply details of your discussions.

The existing services will be used.

Environment

24. Please confirm the standard working hours for the site, noting that the standard working hours for construction sites in Camden are as follows:

• 8.00am to 6pm on Monday to Friday
• 8.00am to 1.00pm on Saturdays subject to agreement with Camden
• No working on Sundays or Public Holidays

Please note that these are Camden's standard times. However, the times operated should be specific to the site and related to the type of work being carried out. Permitted working hours will be considered on a case-by-case basis and the Council reserves the right to reduce/amend these where necessary, including refusal of permission for Saturday working.

Where noise or vibration from the construction of the proposed development exceed the significant observed adverse effect levels or at the reasonable request of the council, works (where reasonably practicable) shall take place on a 2 hours on/off basis. For example:

- ON - Monday to Friday 08:00 - 10:00, 12:00 - 14:00 & 16:00 - 18:00
- ON - Saturdays 11:00 - 13:00.

Where quiet periods are not practical due to engineering reasons the contractor will consider the provision of alternative quiet spaces.

Monday to Friday: 08:00–17:00
Saturday: 08:00–13:00, subject to agreement with Camden
Sundays and Public Holidays: No works

25. Please include a site plan detailing the location of the works and any nearby sensitive receptors

- Residential receptors at the first floor of 333 Euston Road and 337 Euston Road, Residential receptors at the rear of properties on Warren Street, and at the rear of 339 Euston Road
- The nearest commercial receptors are: 333 Euston Road (Double J's Café and Bistro), 337 Euston Road and 59 Warren Street (Bang Bang Vietnamese Canteen), 55 Warren Street (Eva Soft Furnishings), 57 Warren Street (Must and Lees Wine Merchant)

Ref	Description
NSR1	Residential receptors at the first floor of 333 Euston Road, with facades at the front and rear.
NSR2	Residential receptors at the first floor of 337 Euston Road, with facades at the front and rear. Rear windows partially overlook the site.
NSR3	Residential receptors at the rear of properties on Warren Street, and at the rear of 339 Euston Road, with windows overlooking the site.

Table 2 Noise sensitive receptors



Figure 4 Noise sensitive receptors (satellite image)

26. Where applicable, please describe the methods to be used for the demolition, ground works and piling phases. Include the type of plant likely to be used onsite

The basement works will include demolition of existing structures, temporary works, sequential reinforced concrete underpinning, excavation, underground drainage, construction of the reinforced concrete basement slab and installation of the waterproofing system.

Underpinning will be undertaken sequentially in accordance with the structural engineer's drawings and methodology. Underpinning pits will be excavated, temporarily supported and reinforced before concrete is placed in sequence.

Following completion and curing of the underpinning, temporary propping will be installed in accordance with the temporary works engineer's design prior to bulk excavation to basement slab formation level.

Underground drainage and sump chambers will then be installed, followed by construction of the reinforced concrete basement slab and waterproofing system. Following completion of the basement works, the Main Contractor will progress with the superstructure and fit-out works.

Material deliveries and excavation spoil removal will utilise grab lorries, HIAB deliveries and an extendable conveyor system where applicable.

27. Please describe the mitigation measures to be incorporated during the demolition and construction works to prevent noise and vibration disturbances from the activities on the site.

Noise and vibration mitigation measures will be implemented in accordance with the Construction Noise & Vibration Assessment prepared for the development.

The Main Contractor will ensure that the relevant mitigation measures are incorporated into the construction methodology and site procedures.

Please refer to the Construction Noise & Vibration Assessment for further details.

28. Please confirm that the works will follow the guidance included in 'London Good Practice Guide: Noise & Vibration Control for Demolition and Construction.

Confirmed. The demolition and construction works will follow the guidance contained within the London Good Practice Guide: Noise & Vibration Control for Demolition and Construction, where applicable.

29. For medium or large developments, please provide details describing arrangements for the monitoring of noise and vibration levels, including instrumentation, locations of monitors and trigger levels where appropriate. Small sites can be asked to implement a monitoring strategy due to the sensitivity of the local environment.

Contractor shall ensure that all monitoring data is available for inspection and review by the council and should include noise, vibration and dust monitoring data.

We may request to provide a real-time monitoring data to be published if requested by the community working group.

Please refer to the Camden Guidance for additional information on monitoring requirements.

Please see Construction Noise & Vibration Assessment for further details.

30. For large developments, please confirm if a S61 application will be submitted once the contractor has been appointed. Please see the Camden guidance for information on how to apply for extended working hours.

Not applicable.

31. If required, please provide an Air Quality Assessment (AQA) and/or Dust Risk Assessment (DRA).

To establish if an AQA is required, please refer to Camden's Air Quality Planning Guidance document (section 3) and the Council's 'Air quality assessments in planning applications' webpage.

Please attach the AQA and/or DRA as an appendix to this proforma.

Please see Air Quality Assessment for further details.

AQAs and/or Dust Risk Assessments (DRA) should be undertaken at planning application stage for all major developments and follow the methodology outlined in the GLA's The Control of Dust and Emissions During Demolition and Construction SPG. This may not be required for smaller developments, but a DRA will be as part of the CMP assessment. The risk assessment must take into account the proximity of all human and sensitive local receptors (e.g. schools, care homes, health centres etc.) relative to the site boundary, as detailed in the SPG.

Please attach the AQA and DRA as an appendix to this proforma.

Please see Air Quality Assessment for further details.

32. Please confirm that all of the GLA's 'highly recommended' measures from the SPG document relative to the level of dust impact risk identified in the AQA have been addressed by completing the GLA mitigation measures checklist. (See Appendix 7 of the SPG document.)

Confirmed.

33. Please provide specific details on how air pollution and dust nuisance arising from dusty activities on site will be prevented. This should be relevant and proportionate to activities due to take place, with a focus on both preventative and reactive mitigation measures.

The proposed mitigation measures are included in the Air Quality Assessment. Please see Air Quality Assessment for further details.

34. Please provide details describing how any significant amounts of dirt or dust that may be spread onto the public highway will be prevented and/or cleaned.

The proposed mitigation measures are included in the Air Quality Assessment. The main contractor will ensure those mitigation measures to be followed. Please see Air Quality Assessment for further details.

35. Air quality monitoring requirements.

Real-time dust (PM_{10}) monitoring with MCERTS 'Indicative' sensors will be required for all sites with a high OR medium dust impact risk level, as established by the air quality assessment. If the site is a 'high risk site, **four** real time dust monitors will be required. If the site is a 'medium risk site', **two** real time dust monitors will be required.

The dust monitoring must be utilised in accordance with the GLA's SPG and IAQM guidance, and **the proposed dust monitoring regime (including number of sensors, monitoring locations, equipment specification, and trigger levels) must be submitted to the Council for approval during the CMP process**. Dust monitoring is required for the entire duration of the development and must be in place and operational **at least three months prior to the commencement of works on-site**. The Council encourage proactive planning when strategizing the dust monitoring regime to reduce unwanted delays.

A minimum of three-months of baseline air quality monitoring data must be collected prior to the commencement of works on site. A summary report must be provided to AirQuality@Camden.gov.uk, following the baseline monitoring period.

Monthly dust monitoring reports must also be provided to the Council detailing: onsite activities during each monthly monitoring period, dust mitigation measures utilised, monitoring data coverage, graphs of measured dust (PM_{10}) concentrations, any exceedances

of the trigger levels, and an explanation on the causes of any and all exceedances in addition to the mitigation measures implemented to rectify these.

In accordance with Camden's Clean Air Action Plan, the monthly dust monitoring reports must also be made readily available and accessible online to members of the public soon after publication. Information on how to access the monthly dust monitoring reports should be advertised to the local community (e.g. presented on the site boundaries in full public view).

Inadequate dust monitoring or reporting, or failure to limit trigger level exceedances, will be indicative of poor air quality and dust management, and will lead to enforcement action.

Using the above information, please provide details on the air quality monitoring strategy for the proposed development

The Air Quality Assessment identifies the site as a **Medium Risk** site in respect of construction dust impacts. Two real-time PM10 monitors have therefore been installed on site.

Monitoring is being undertaken using EarthSense Zephyr air quality monitors. The monitors were installed on 8 October 2026 and comprise an upwind and a downwind monitoring position. The system provides continuous PM10 monitoring, remote access to monitoring data and automatic trigger alerts.

Monitoring will continue throughout the development works, with monthly monitoring reports provided to Camden Council.

Trigger levels:

Alert level – 15-minute average: 150 µg/m³
Action level – 15-minute average: 250 µg/m³
Action level – 1-hour average: 190 µg/m³

In the event of a trigger level exceedance, the site team will investigate the potential cause and provide feedback to the air quality consultant for inclusion within the monthly monitoring report.

The monitoring locations are shown below.



36. All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of Camden Council. The developer shall keep an up-to-date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at:

https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/nrmm

Direct link to NRMM Practical Guide (V6):

https://www.london.gov.uk/sites/default/files/2024-05/NRMM-Practical-Guide-Accessible-May2024.pdf

Current requirements (as of 01/01/2025):

(i) All development sites in Greater London required to meet Stage IV - The CAZ, Opportunity Areas and Greater London zones will no longer have different emission standards. All NRMM on all sites within Greater London will be required to meet Stage IV as a minimum. Generators will continue to be required to meet Stage V.
(ii) NRMM register - The site and all in-scope machinery (37-560kW) must be registered on the GLA's NRMM Website.

(iii) Generators - Generators are required to meet Emission Stage V across the whole of London. When bringing a generator to site, you must ask your supplier for a Stage V generator. If a suitable Stage V solution is not available for the site, you will need to apply for an exemption.

Please provide evidence demonstrating the above requirements will be met by answering the following questions:

a) Construction time period (mm/yy - mm/yy): 10/2026 – 06/2028 (approx.)

b) Is the development within the CAZ? (Y/N): Y

c) Will the NRMM with net power between 37kW and 560kW meet the standards outlined above? (Y/N): Y

d) Please confirm that all relevant machinery will be registered on the NRMM Register, including the site name under which it has been registered: Yes, the site will be registered by the main contractor

e) Please confirm that an inventory of all NRMM will be kept on site and that all machinery will be regularly serviced and service logs kept on site for inspection: Yes.

f) Please confirm that records will be kept on site which details proof of emission limits, including legible photographs of individual engine plates for all equipment, and that this documentation will be made available to local authority officers as required: Yes.

37. Vehicle engine idling (leaving engines running whilst parked or not in traffic) produces avoidable air pollution and can damage the health of drivers and local communities. Camden Council and the City of London Corporation lead the London **Idling Action Project** to educate drivers about the health impacts of air pollution and the importance of switching off engines as a simple action to help protect the health of all Londoners.

Idling Action calls for businesses and fleet operators to take the **Engines Off pledge** to reduce emissions and improve air quality by asking fleet drivers, employees and subcontractors to avoid idling their engines wherever possible. Free driver training materials are available from the website: https://idlingaction.london/resources-1

Please provide details about how you will reduce avoidable air pollution from engine idling, including whether your organisation has committed to the Engines Off pledge and the number of staff or subcontractors who have been provided with free training materials.

The main contractor's site manager will ensure that drivers do not leave engines running while parked or not in traffic. The site manager will also use materials from the Idling Action website mentioned above.

38. Please confirm when an asbestos survey was carried out at the site and include the key findings.

An asbestos survey wasn't carried out at this stage. It can be done if Camden Council finds it necessary.

39. Complaints often arise from the conduct of builders in an area. Please confirm steps being taken to minimise this e.g. provision of a suitable smoking area, tackling bad language and unnecessary shouting.

All operatives and site staff will undergo a comprehensive site induction, during which all of the above points will be discussed, and clear site rules will be established. Smoking will be restricted to a designated area within the site hoarding, away from non-smokers, with appropriate fire precautions in place. Bad language will be addressed during the induction and will not be tolerated; offenders will be removed from the site immediately. Unnecessary shouting will be minimized by using radios.

40. The CMP Planning Site Inspector conduct site inspections, which may be scheduled (planned) or unscheduled (unplanned) visits. Ensure the site accessible and available for these inspections. Non-compliance with the agreed CMP plan or failure to meet CMP requirements may result in a deduction from the bond payment, please confirm that you understand these requirements.

Confirmed.

Mental Health Training

41. Poor mental health is inextricably linked to physical health, which in turn impacts performance and quality, and ultimately affects productivity, creativity and morale. Workers in the construction industry are six times more likely to take their own life than be killed in a fall from height.

We strongly recommend signing up to the "Building Mental Health" charter, an industry-wide framework and charter to tackle the poor mental health in the construction industry, or joining Mates In Mind, which providing the skills, clarity and confidence to construction industry employers on how to raise awareness, improve understanding and address the stigma that surrounds mental health.

The Council can support by providing free Mental Health First Aid training, publicity resources and signposting to local support services.

Please state whether you are or will be signed up to the Building Mental Health charter (or similar scheme), and that and appropriate number of trained Mental Health First Aiders will be available on site.

The main contractor will be responsible for mental health training.

Agreement

The agreed contents of this Construction Management Plan must be complied with unless otherwise agreed in writing by the Council. This may require the CMP to be revised by the Developer and reapproved by the Council. The project manager shall work with the Council to review this Construction Management Plan if problems arise in relation to the construction of the development. Any future revised plan must be approved by the Council in writing and complied with thereafter.

It should be noted that the failure to ensure compliance with the CMP will be taken very seriously by the Council including draw down of funds from the construction management bond payment and possible formal enforcement in line with the CMP Guidance.

It should be noted that any agreed Construction Management Plan does not prejudice further agreements that may be required such as road closures or hoarding licences.

Print name ……

Position……..

Date ……

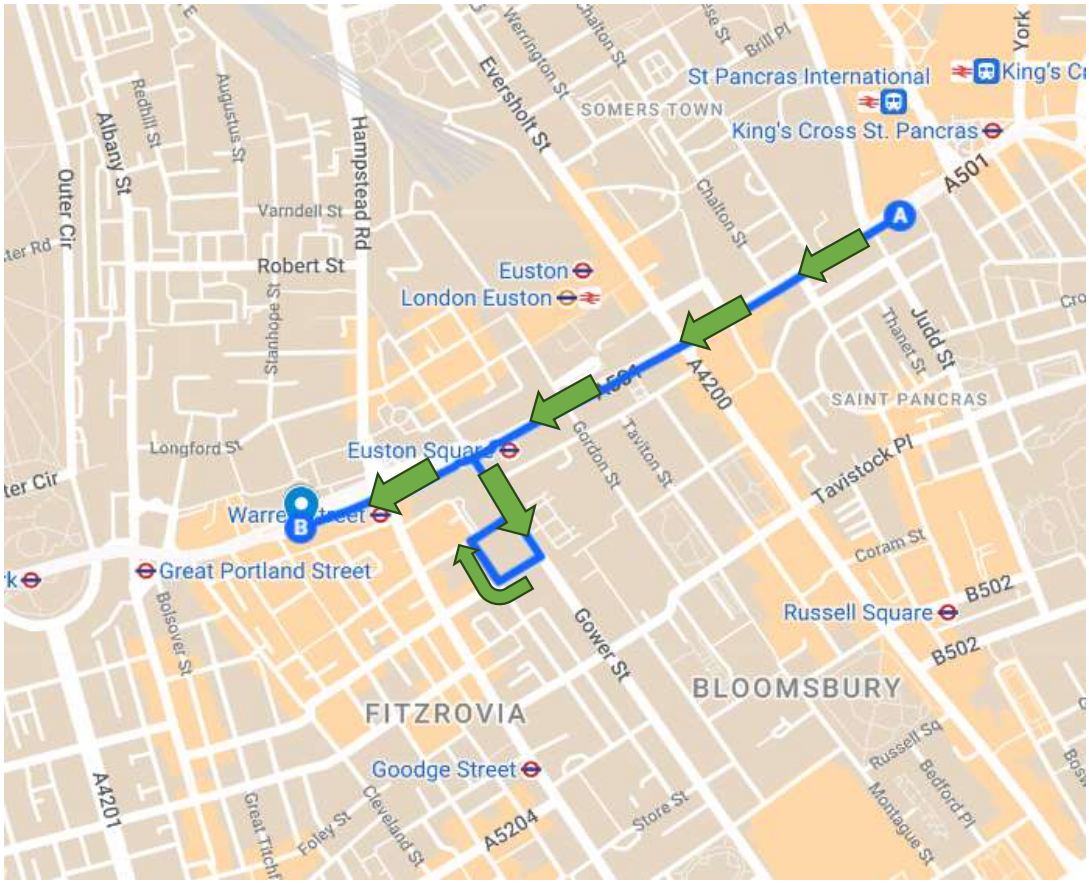
Please submit to: planningobligations@camden.gov.uk

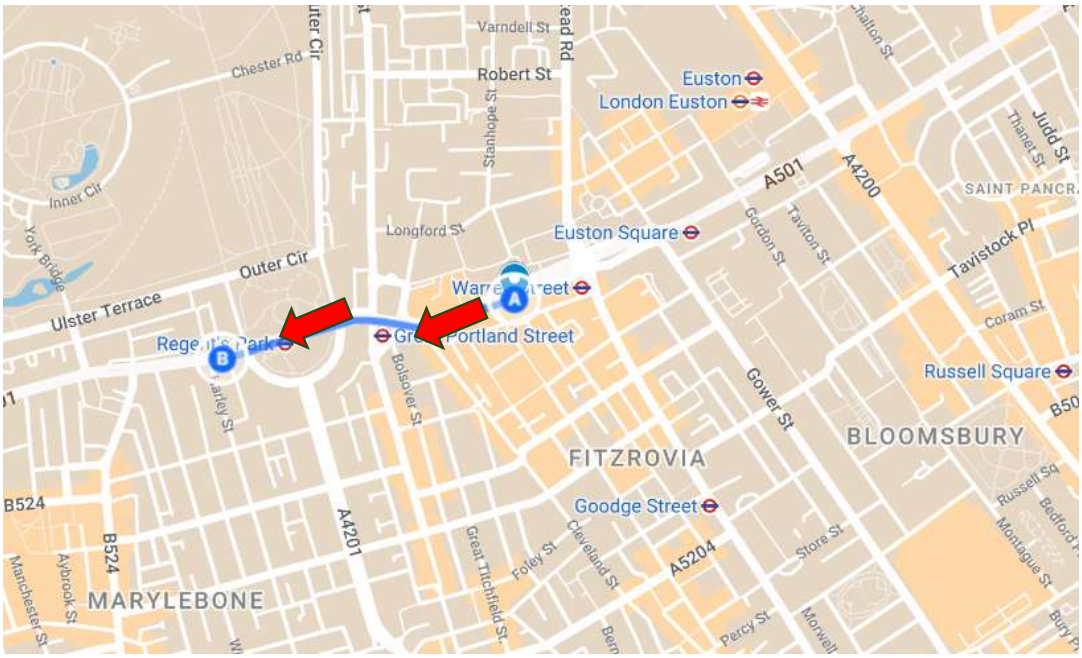
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Updated 09/02/2026 V3.3

CMP APPENDICES FOR 335 EUSTON ROAD

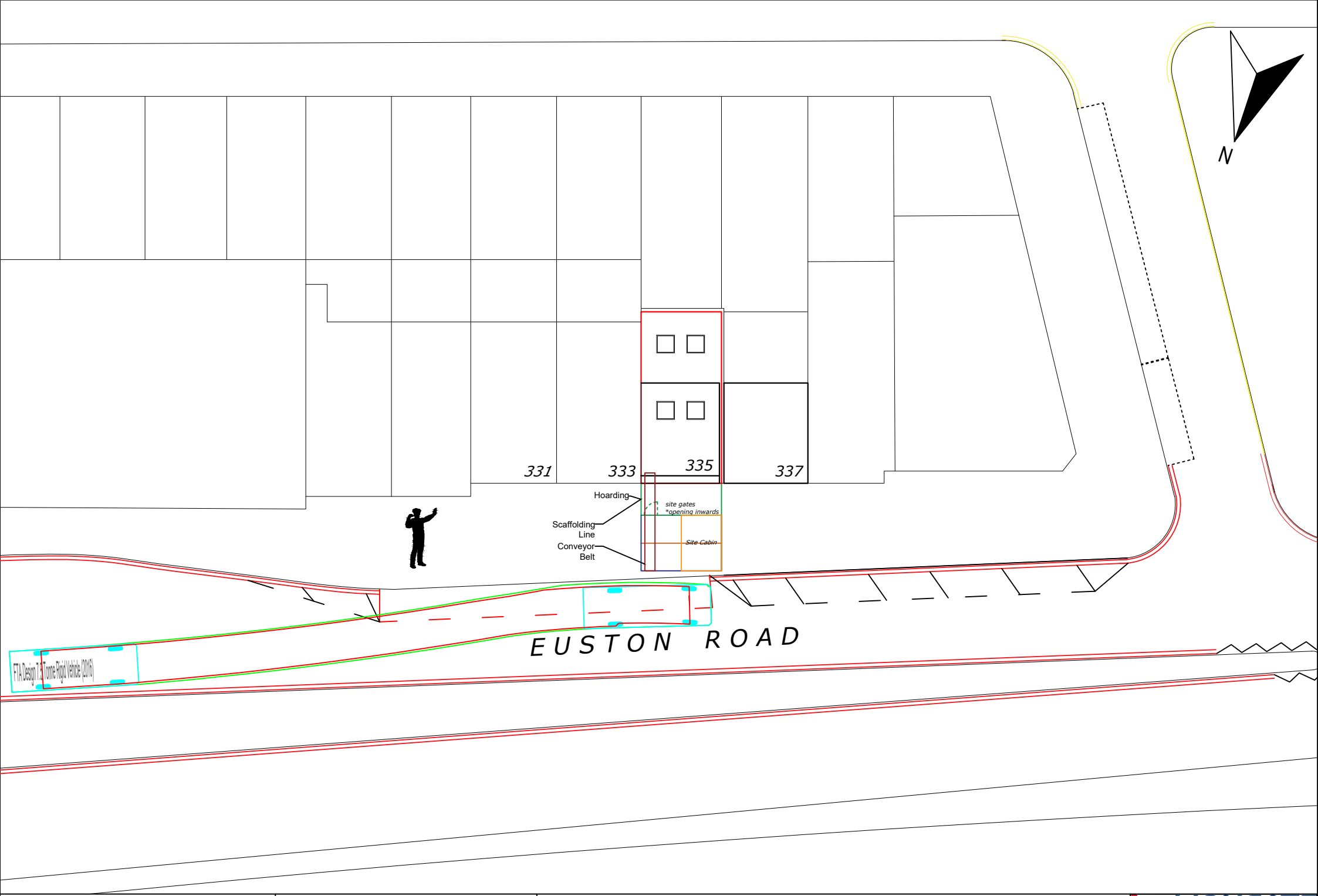
Appendix A: Vehicle Routes





These routes will be taken into consideration once the commencement date is confirmed. The main contractor will communicate with neighboring sites at that time to mitigate the impacts of construction traffic.

Appendix B: SPA Drawings

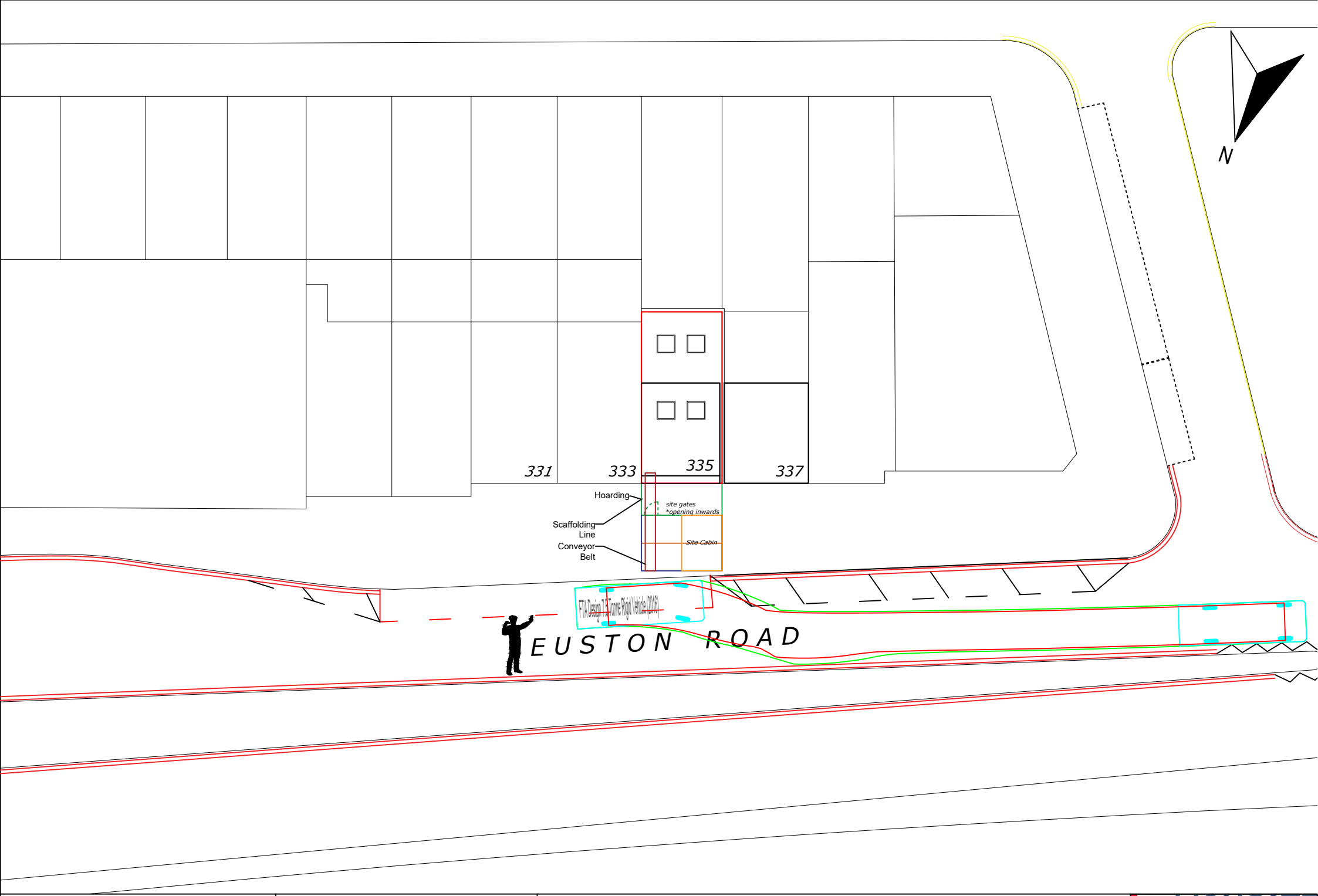


SITE INGRESS

Scale 1:250 on A4

10 m 20 m 30 m

LIONGATE CONSTRUCTION



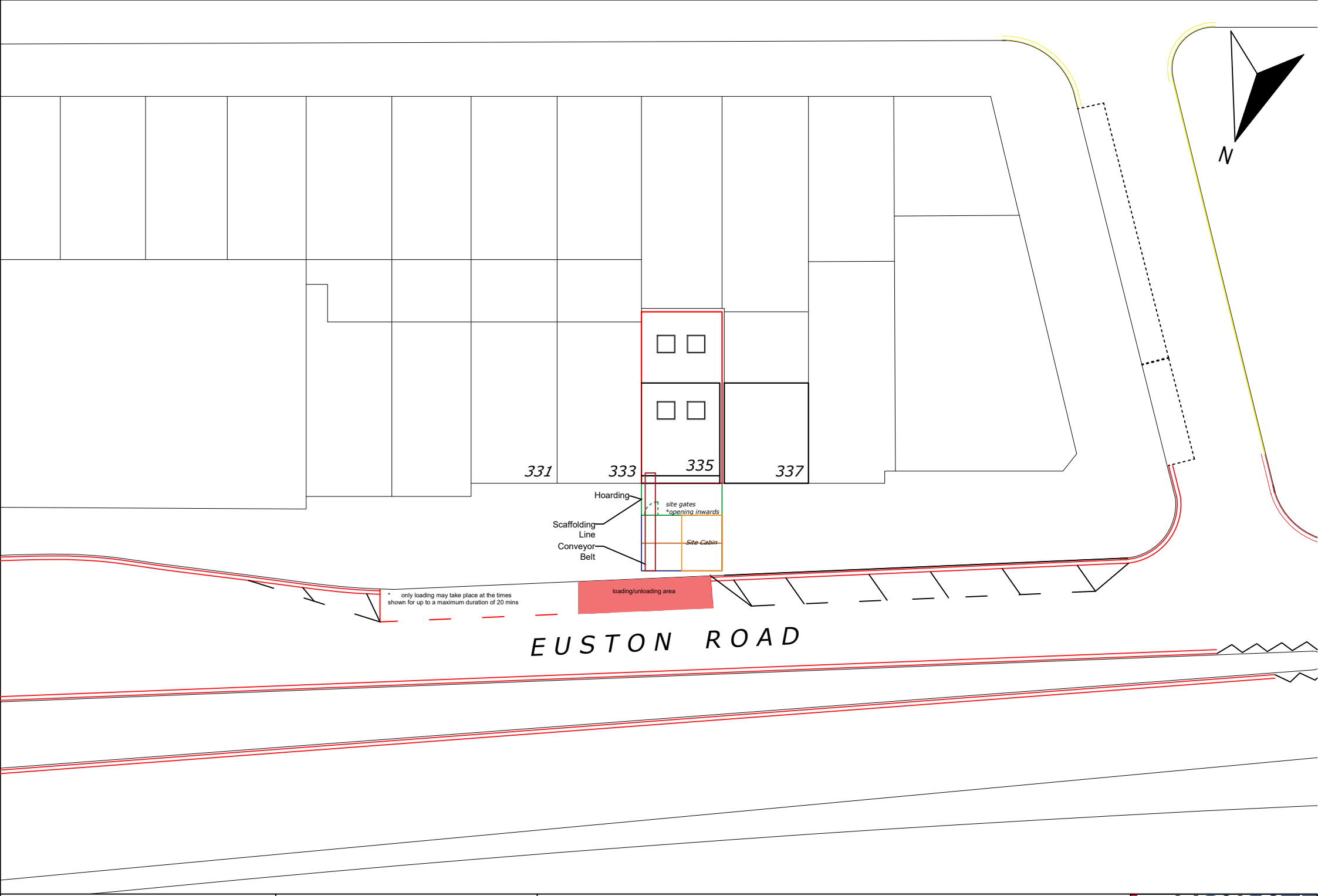
SITE EGRESS

Scale 1:250 on A4

10 m 20 m 30 m

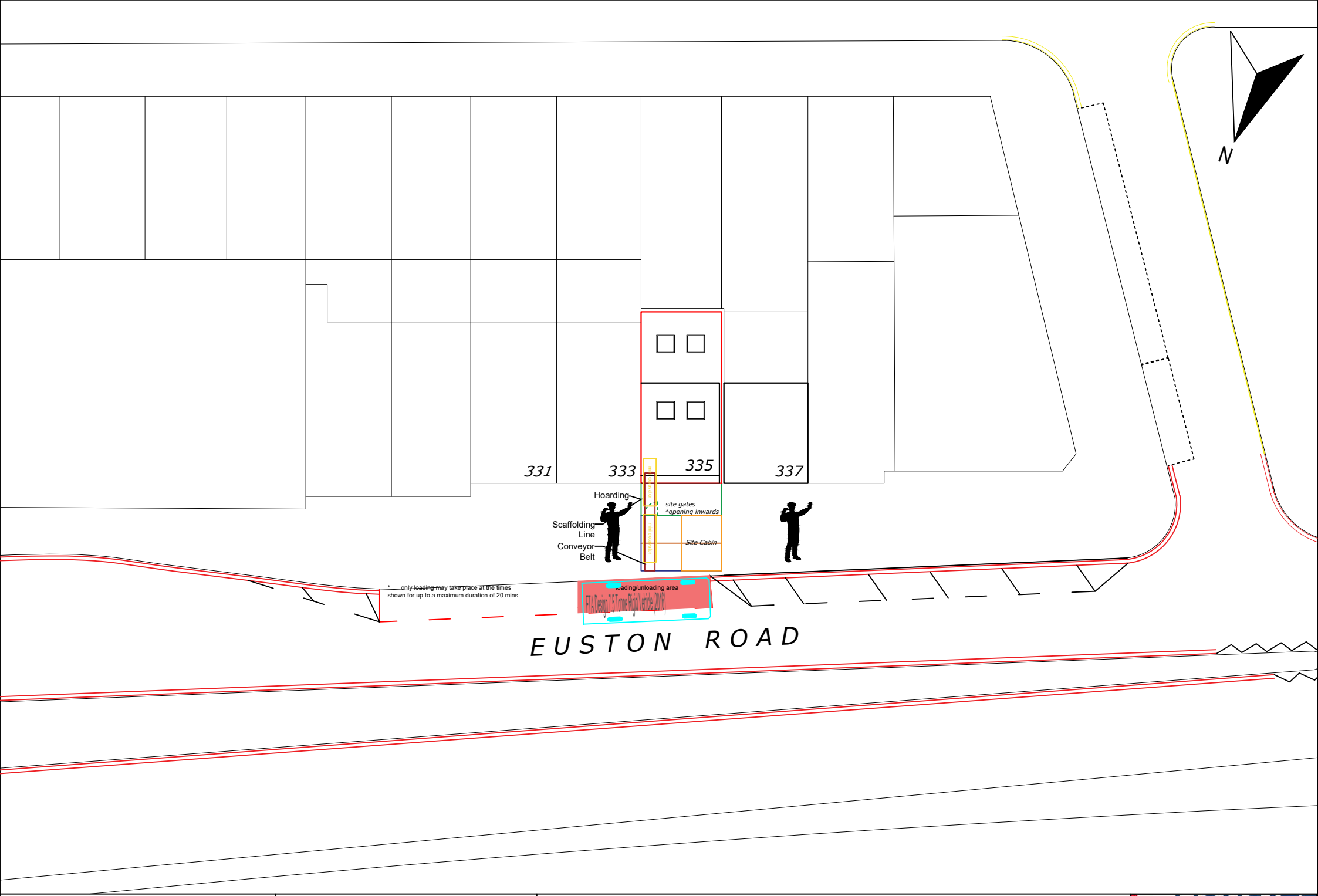
LIONGATE CONSTRUCTION

Appendix C: Site Arrangement



SITE SETUP PLAN | Scale 1:250 on A4 | 10 m | 20 m | 30 m | LIONGATE CONSTRUCTION

Appendix D: Site Traffic Arrangements



SITE TRAFFIC ARRANGEMENTS PLAN

Scale 1:250 on A4

10 m 20 m 30 m

LIONGATE CONSTRUCTION

Appendix E: Draft Community Letter

16/10/2026

Community Letter

335 Euston Road, London NW1 3AD – Construction Management Plan Consultation

Dear Neighbour,

We are writing in relation to the proposed works at 335 Euston Road, London NW1 3AD and the forthcoming submission of a revised Construction Management Plan (CMP) to the London Borough of Camden.

The project involves the demolition of the existing single-storey retail unit and the construction of a new three-storey building with a basement and roof level for use as a medical facility.

"Erection of a roof extension with roof terrace and extension into courtyard space."

As part of the CMP process, we are undertaking a neighbourhood consultation specifically in relation to the proposed construction works and their potential impacts.

A copy of the revised CMP will be available to view using the QR code/link below:

If you have any comments on the document or on the construction process, we would be grateful if you could submit them using the contact form in the link below or via email within 14 days of the date of this letter.

Roman Fedyniak, Project Manager

EcoHomeLondon Ltd

Telephone: 07807 054500

Email: Info@ecohomelondon.co.uk

Appendix F: CIA Checklist

CONSTRUCTION MANAGEMENT PLANS

Cumulative Impact Area

Central London

Statement & Checklist

Planning Reference 2022/3653/PRE

Site Address 335 Euston Road, London, NW1 3AD

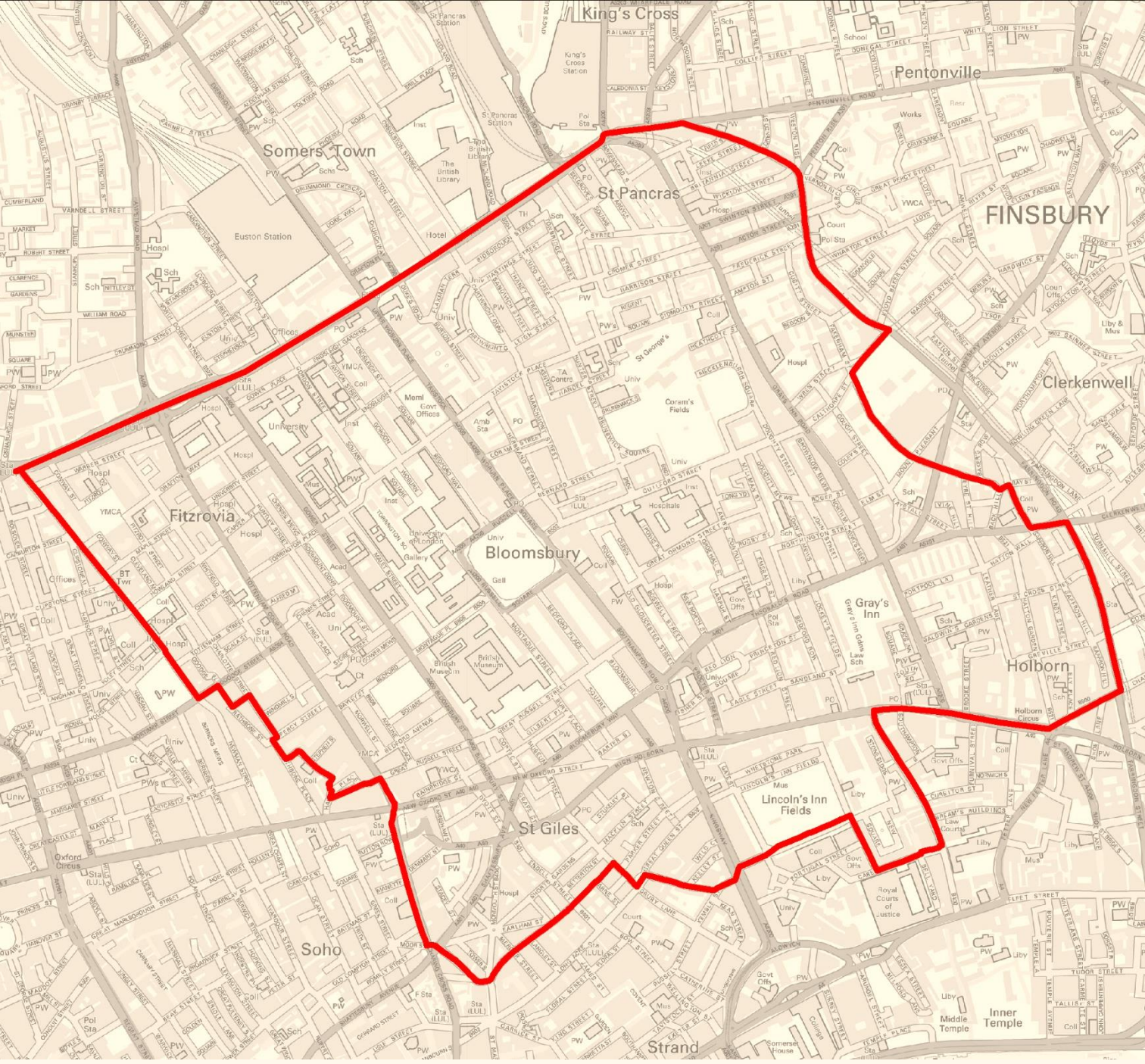
Camden

Statement

The Central London area represents just under a quarter of the total planned development activity in the borough despite only representing 13% of the geographical area. In addition to activity related to the redevelopment of sites, there is a significant amount of commercial buildings that undertake refurbishment works that have similar impacts but are not controlled by planning consents. The interaction of high levels of construction and construction traffic with established business/residential travel patterns is giving rise to heightened community concerns and mean that there is an increased need for careful management of construction activities and their potential impacts

The area is characterised by historic buildings with narrow streets alongside high density modern developments, with residential and commercial operations sitting side by side - the area also attract a lot of tourism, and as such the movement of people is much greater than just residents and employees. The busy nature of this area means that even the smallest redevelopment may give rise to complications with traffic and reports of public nuisance.

Noise and vibration from construction sites has the potential to give rise to significant adverse effects on health and quality of life. Based on our experience we know that some of these impacts can be effectively managed. However, this potential is affected by the challenges posed by Cumulative Impacts where the impacts of various construction sites create effects of greater significance than or different to that of each individual construction site. Managing the impacts of various sites in one area and ensuring a consistent approach to noise and vibration mitigation can be a major challenge in its own right.


King's Cross
Pentonville
Somers Town
St Pancras
FINSBURY
Euston Station
Clerkenwell
Fitzrovia
Bloomsbury
Gray's Inn
Holborn
Lincoln's Inn Fields
St Giles
Soho
Strand
Middle Temple
Inner Temple

Statement

Redevelopment proposals need think carefully how a site will be delivered, considering issues well beyond the site boundary, in particular:

- The proximity of properties, in particular the potential for structure borne noise and dust control
- Co-ordination with neighbouring sites, considering both construction traffic and business that require deliveries
- Communication and availability of data to a wider audience who may not be in close proximity to the development but nonetheless will be impacted, such as those who work in the area.
- The area is a designated Air Quality Management Area (AQMA) and the Council has made a commitment to reduce particulate air pollution to levels recommended by the World Health Organisation. In response, all sites in the Central London area will be required to undertake the following additional obligations as part of their Construction Management Plan. Developers/ Contractors will be required to justify (and for such justification to be made public) why any of the following elements cannot be achieved:-

WORKS

- Assumption of no working at weekends – any proposals for weekend working will be considered on a case by case basis and communicated to local residents 14 days in advance of works
- Prior to proposing any road closures, weekend working or oversize deliveries (to which all require express approval from the Council) the contractor must provide evidence that they have approached neighbouring sites and attempted to coordinate any proposals with those of the neighbouring site.
- Prior to connecting a site to utilities (Gas, Water, Electric, Telecoms) the contractor must provide evidence that they have approached neighbouring sites (and the utilities providers) and attempted to coordinate connection between neighbouring sites and the various utilities.

COMMUNICATION

- CMPs will be made available online (both prior to approval and post approval) such as on a dedicated webpage
- All logs (accident, complaint) will be made available online and a physical copy made available for residents to use and view
- Where there are neighbouring site or sites in close proximity that effect the local highway network, joint communication (i.e. Newsletters) will be required.
- Construction Working Groups will be conducted jointly with neighbouring sites
- All environmental monitoring data to be made available on-line and on site boards

DELIVERIES

- A delivery log, specifying the type of vehicle, its purpose, registration number and time on site must be maintained online and updated at least on a weekly basis.
- Contractors will be required to provide evidence that they have communicated their proposed deliveries with neighbouring construction sites and any other business, and have coordinated the deliveries where possible.
- No deliveries shall be scheduled that will require the driver to wait outside the site before 8.00am (and vehicles will not be permitted to circulate the highway to avoid this requirement)
- A pre-booking system for managing deliveries must be operated. All deliveries must contact site at least 20min before arrival to allow the necessary checks to be undertaken

Statement

MITIGATION AND RESPITE

- Adoption of localised mitigation measures such as washing the windows of neighbouring properties.
- Developments will be required to pay a Construction Impacts Bond to the Council to support the cost of Council officers addressing matters that should have been addressed by the contractor
- Dedicated wheel washing with rumble grids must be utilised unless agreed otherwise by the Council
- Green infrastructure, such as green screens/hoarding, should be utilised. Installation of filtration units, particularly where the site is near (within 250m) vulnerable receptor facilities (such as schools, nursing homes and hospitals)

SITE CONDUCT

- A firm disciplinary policy, such as a two strike warning before removal from site must be operated
- Contractors must attain the Considerate Contractors Scheme ‘Exceptional’ score
- Contractor must employ an enforcement process to ensure that contractors vehicles do not idle
- A plan and process to encourage site operatives to arrive at the site by sustainable methods (including car sharing / pooling) must be presented and communicated
- CLOCS compliance monitoring results need to be reported to council
- All sites must ensure that Traffic Marshalls /Banksmen are appropriately trained, and that there is at least one operative on duty at any given time that has at least has 1+ year of experience in that role.
- The site must be kept damp at all times, proposed equipment for this purpose must first be agreed to by the local authority.
- Weekly ‘toolbox talks’ should be conducted with all site operatives to advise of the requirements expected by the Council.
- Site operatives should be identifiable by the public to the site, such as using a uniformed colour of work jackets or branding.

MACHINERY AND EQUIPMENT

- All heavy goods vehicles (HGVs) are required to be Euro VI standard or better, and light duty vehicles (LDVs) are required to be Euro 4 petrol or Euro 6 for diesel, or better. Preference should be for zero to low emission equipment
- NRMM should be to stage IV of EU Directive 97/68/EC as a minimum, and an up-to-date NRMM log must be kept on-site and shared with Camden officers
- The site must connect to mains prior to works commencing to remove the need for diesel generators
- At least four real-time PM10 monitors (certified to MCERTS standard) must be used on site in continuous operation for the duration of the build (from three months prior to implementation of planning permission through to completion on site), at locations and to thresholds approved by the Council. Camden officers must be provided access to the raw data via an online platform, and automated exceedance alerts should be sent to AirQuality@camden.gov.uk in addition to the contractor/developer on-site representatives
- Web-enabled monitoring equipment, allowing real time information accessible by the public should be deployed – including the use of emerging technologies.
- Environmental monitoring summary reports should be sent to Camden officers on a monthly basis

CHECKLIST



All development sites in the Cumulative Impact Area which are required to submit a Construction Management Plan (CMP) or Demolition Management Plan (DMP) are required to complete this checklist.

The checklist will need to be presented for comment to the local community as part of the pre-submission CMP/DMP. The Council will not accept the submission of the CMP/DMP unless it receives both the completed CIA checklist . If a particular requirement cannot be met, stipulate the reason why and propose an alternative solution to achieve the objective

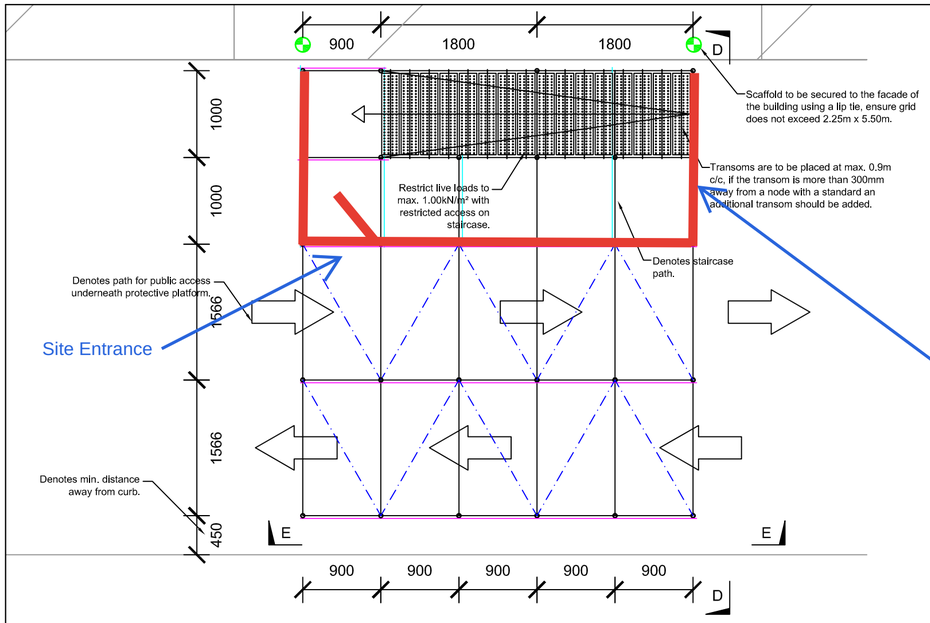
	Requirement	Response
WORKS	No noisy working at weekends – any proposals for weekend working will be considered on a case by case basis and communicated to local residents 14 days in advance of works	The main contractor will adhere to rules regarding noisy working on weekends. Any weekend work will be evaluated as needed and, if required, local residents will be notified at least 14 days in advance. Once planning permission is granted and the construction start date is confirmed, the main contractor will communicate with neighboring sites and coordinate any proposals for road closures, weekend working, or oversize deliveries as required. Evidence of this coordination will be provided. Before connecting the site to utilities (Gas, Water, Electric, Telecoms), the contractor will provide evidence of coordination with neighboring sites and utility providers to
	Prior to proposing any road closures, weekend working or oversize deliveries (to which all require express approval from the Council) the contractor must provide evidence that they have approached neighbouring sites and attempted to coordinate any proposals with those of the neighbouring site	
	Prior to connecting a site to utilities (Gas, Water, Electric, Telecoms) the contractor must provide evidence that they have approached neighbouring sites (and the utilities providers) and attempted to coordinate connection between neighbouring sites and the various utilities	
COMMUNICATION	CMPs will be made available online (both prior to approval and post approval) such as on a dedicated webpage	The main contractor will ensure that Construction Management Plans (CMPs) are available online with all logs (accident, complaint) accessible online and in physical form for residents. Neighbours listed in the CMP and Noise Report as sensitive receptors will receive a letter from the contractor with a QR code linking to the CMP website and other online logs. Joint communication, like newsletters, will be used if neighboring sites impact the local highway network. The contractor will also organize Construction Working Groups with neighboring sites and make all environmental monitoring data available online and on-site boards.
	All logs (accident, complaint) will be made available online and a physical copy made available for residents to use and view	
	Where there are neighbouring site or sites in close proximity that effect the local highway network, joint communication (i.e. Newsletters) will be required	
	Construction Working Groups will be conducted jointly with neighbouring sites	
	All environmental monitoring data to be made available on-line and on site boards	

	Requirement	Response
DELIVERIES	A delivery log, specifying the type of vehicle, its purpose, registration number and time on site must be maintained online and updated at least on a weekly basis	The main contractor will maintain an online delivery log on the same website as the Construction Management Plan (CMP), specifying the type of vehicle, its purpose, registration number, and time on site. This log will be updated at least weekly to ensure accurate and current information. The main contractor will provide evidence of communication with neighboring construction sites and businesses regarding proposed deliveries. They will coordinate deliveries with these sites wherever possible to minimize disruptions and ensure smooth operations The main contractor will ensure that no deliveries wait outside the site before 8:00 AM and that vehicles do not circulate the highway to avoid this requirement and the main
	Contractors will be required to provide evidence that they have communicated their proposed deliveries with neighbouring construction sites and any other business, and have coordinated the deliveries where possible	
	No deliveries shall be scheduled that will require the driver to wait outside the site before 8.00am (and Vehicles will not be permitted to circulate the highway to avoid this requirement)	
	A pre-booking system for managing deliveries must be operated. All deliveries must contact site at least 20min before arrival to allow the necessary checks to be undertaken	
MITIGATION AND RESPITE	Adoption of localised mitigation measures such as washing the windows of neighbouring properties	There will no green hoardings or wheel washing facilities. The main contractor or owner will pay a Construction Impacts Bond to the Council to cover any costs related to issues that should have been managed by the contractor. Additionally, local mitigation measures, such as washing the windows of neighboring properties, will be adopted as needed to minimize the impact of construction.
	Developments will be required to pay a Construction Impacts Bond to the Council to support the cost of Council officers addressing matters that should have been addressed by the contractor	
	Dedicated wheel washing with rumble grids must be utilised unless agreed otherwise by the Council	
	Green infrastructure, such as green screens/hoarding, should be utilised. Installation of filtration units, particularly where the site is near (within 250m) vulnerable receptor facilities (such as schools, nursing homes and hospitals)	

	Requirement	Response
SITE CONDUCT	A firm disciplinary policy, such as a two strike warning before removal from site must be operated	The main contractor will ensure a firm disciplinary policy is in place, with a two-strike warning system before removal from site. The main contractor will have an 'Exceptional' score from the Considerate Constructors Scheme. They will enforce a policy to prevent vehicle idling and will develop and communicate a plan to encourage site operatives to use sustainable transport methods, including car sharing. CLOCS compliance monitoring results will be reported to the council. Traffic Marshalls/Banksmen will be properly trained, with at least one operative on duty having over a year of experience. The site will be kept damp at all times, with any equipment for this purpose approved by the local authority. Weekly 'toolbox talks' will be conducted to inform site operatives of Council requirements, and operatives will wear identifiable uniforms or branded jackets to be easily recognized by the public.
	Contractors must attain the Considerate Contractors Scheme 'Exceptional' score	
	Contractor must employ an enforcement process to ensure that contractors vehicles do not idle	
	A plan and process to encourage site operatives to arrive at the site by sustainable methods (including car sharing / pooling) must be presented and communicated	
	CLOCS compliance monitoring results need to be reported to council	
	All sites must ensure that Traffic Marshalls / Banksmen are appropriately trained, and that there is at least one operative on duty at any given time that has at least has 1+ year of experience in that role.	
	The site must be kept damp at all times, proposed equipment for this purpose must first be agreed to by the local authority.	
	Weekly 'toolbox talks' should be conducted with all site operatives to advise of the requirements expected by the Council.	
	Site operatives should be identifiable by the public to the site, such as using a uniformed colour of work jackets or branding.	

	Requirement	Response
MACHINERY AND EQUIPMENT	All heavy goods vehicles (HGVs) are required to be Euro VI standard or better, and light duty vehicles (LDVs) are required to be Euro 4 petrol or Euro 6 for diesel, or better. Preference should be for zero to low emission equipment	The main contractor will register the site on the NRMM website. The log will be maintained by the contractor and shared with Camden Council. The contractor will also ensure that all vehicles comply with the council's requirements.Additionally, the contractor will arrange mains power prior to the commencement of construction to avoid the use of diesel generators. The main contractor will deploy at least four real-time PM10 monitors on site. These monitors will operate continuously from three months before the planning permission is implemented until the project is completed. The locations and thresholds for these monitors will be approved by the Council. Camden officers will have access to raw data via an online platform, and automated exceedance alerts will be sent to AirQuality@camden.gov.uk as well as to on-site representatives. Web-enabled monitoring equipment will be used to provide real-time information to the public, incorporating emerging technologies where possible. Environmental monitoring summary reports will be sent to Camden officers monthly.
	NRMM should be to stage IV of EU Directive 97/68/EC as a minimum, and an up-to-date NRMM log must be kept on-site and shared with Camden officers	
	The site must connect to mains prior to works commencing to remove the need for diesel generators	
	At least four real-time PM10 monitors (certified to MCERTS standard) must be used on site in continuous operation for the duration of the build (from three months prior to implementation of planning permission through to completion on site), at locations and to thresholds approved by the Council. Camden officers must be provided access to the raw data via an online platform, and automated exceedance alerts should be sent to AirQuality@camden.gov.uk in addition to the contractor/developer on-site representatives	
	Web-enabled monitoring equipment, allowing real time information accessible by the public should be deployed – including the use of emerging technologies	
	Environmental monitoring summary reports should be sent to Camden officers on a monthly basis	
	The use of powered, percussive breaking equipment should be avoided. Where this is considered not possible early discussions with the Council.	

Appendix G: Staircase and Access Platform



IMPOSED AND PERMITTED LOADS:

The client must ensure that all loadings are sufficient, that the stated live loads are not exceeded and ensure foundations and/or supports are capable of supporting the loads imposed upon them by the scaffold.

LOAD CLASS / DESIGNATION:	2 / 4 + 1
MAXIMUM BAY LENGTH:	1.00m
MAXIMUM LIFT HEIGHT:	2.30m
MAXIMUM PLATFORM LOAD:	2.00 kN/m²
LOADED PLATFORMS:	1@100%
MAXIMUM AXIAL LOAD:	5.58 kN
TIE DUTY:	STANDARD
MAXIMUM TIE LOAD:	4.04 kN
TESTED TO (1.25 : 1 F.O.S.):	5.06 kN

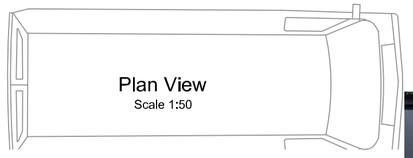


Site location

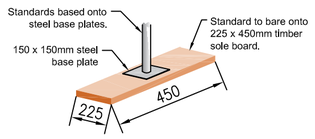
Grid Reference: TQ291822

Please note some dimensions have been estimated and should be used as a guide. If it is found to be greatly different EGA Consulting Engineers Ltd should be contacted to confirm findings.

EUSTON ROAD



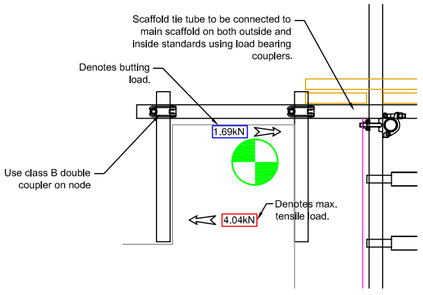
Plan View
Scale 1:50



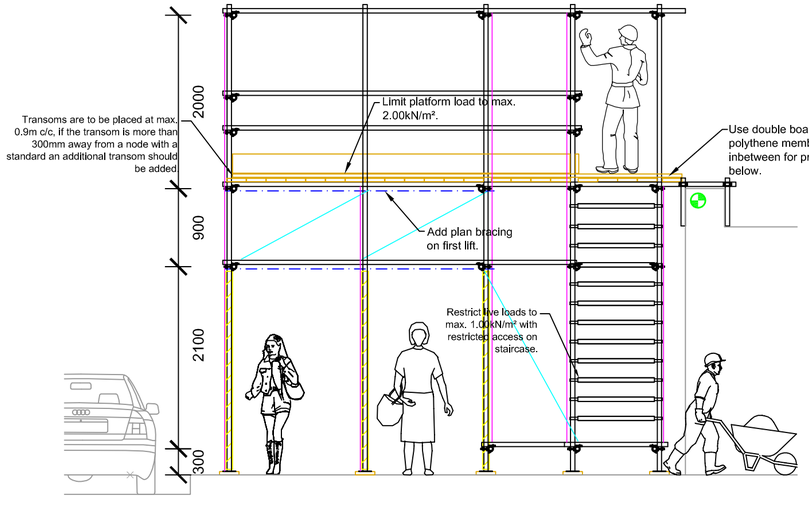
Sole Board Detail
Not to scale



Site Photo
Not to scale



Tie detail
Scale 1:16



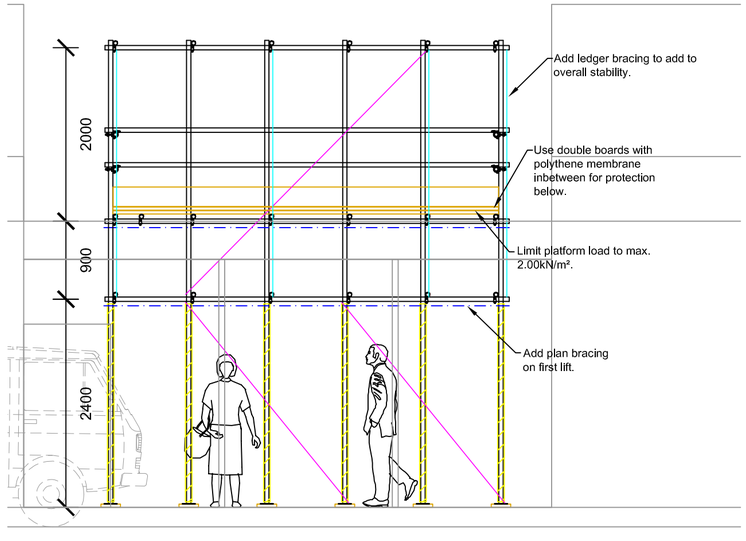
Section D - D
Scale 1:50

CUSTOMER TO:

1. Approve layout prior to any erection.
2. Ensure structure is capable of withstanding all loads imposed from scaffold.

NOTE
Drawings should be read in conjunction with calculations.

All couplers to be type EN74 class B with min 9.1kN slip capacity.



Section E - E
Scale 1:50

General Notes

1. Any discrepancy on this drawing is to be reported immediately to EGA Consulting Engineers Ltd for clarification.
2. Scaffold has been designed in accordance with TG20:21 Guide to good practice for scaffolding with Tube and Fittings. Wind loading has been designed in accordance with BS EN 1991 - 1 - 1: General Actions - Densities, self - weight, imposed loads for building. BS EN 1991 - 1 - 3: General Actions - Snow loads and BS EN 1991 - 1 - 4: General Actions - Wind actions
3. Drawings must not be scaled.
4. The setting out and final levelling of scaffold is to be the responsibility of the client.
5. The client is to ensure all the auxiliary equipment is capable of safely transferring the loads to the vertical members (standards).
6. This drawing is the property of EGA Consulting Engineers Ltd. Unauthorised use or copy is strictly forbidden.
7. No amendments or modifications are to be made without approval from EGA Consulting Engineers Ltd.
8. The client must ensure that the foundations bearing capacity is not exceeded by the load applied by the scaffold.
9. The client is responsible to ensure that there is adequate facilities for tying the scaffold to the building. The client must ensure the structure is able to withstand the load applied to it by scaffold.
10. The drawing has been prepared from detail supplied to us by the client. The client should check that his requirements have been interpreted correctly and that all loading, dimensions, details, striking and erection sequences are correct and practicable. Alterations should not be made without reference to EGA Consulting Engineers Ltd.

Special Notes

An imposed load of 2.00kN/m² has been allowed for access loading for one lift to take into account general loading.

Ties to resist min. tensile load of 4.04 kN. *(Netted)*

Please note some dimensions have been estimated and should be used as a guide. If it is found to be greatly different EGA Consulting Engineers Ltd should be contacted to confirm findings.

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Intention of drawing

Approval Drawing

Site	335 Euston Road, London	
Title	Staircase and access platform.	
Drawn By	Checked By	Date
NK	NK	22 March 2026

A	Width alteration	27/03/26	NK	NK	Revision	Scale	Drawing number
Rev`N	Amendment	Date	Amended by	Checked by	A	As per dwg	QS26/38/04/R6 - 01

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MEDICAL TEAM LIMITED

AIR QUALITY ASSESSMENT

335 EUSTON ROAD, LONDON NW1 3AD

Client: Medical Team Limited

Report Ref: P7162-R1-V1

Issue Date: 9th May 2024

Document Status: Version 1



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DATE ISSUED: **9th MAY 2024**

REPORT REFERENCE: **P7162-R1-V1**

MEDICAL TEAM LIMITED

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AIR QUALITY ASSESSMENT

REPORT VERSION CONTROL:

Document Reference	Date	Prepared by	Checked by	Authorised by
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1 INTRODUCTION

1.1.1 By instruction from Medical Team Limited, NoiseAir Limited was commissioned to undertake an Air Quality Assessment (AQA) in support of a proposed development comprising of a new medical facility at 335 Euston Road, London NW1 3AD, herein referred to as 'the Site'.

1.1.2 The Site is located within the London Borough of Camden (LBC) Air Quality Management Area (AQMA), which was declared in 2002 due to measured exceedances of the nitrogen dioxide (NO_2) annual mean objective and the particulate matter (PM_{10}) 24-hr mean objective. This AQMA covers the entire borough.

1.1.3 Limitations of this report are outlined in **Appendix A**.

1.2 Requirement for Assessment

1.2.1 A pre-application response from London Borough of Camden has highlighted the need for an Air Quality Assessment, with the following comments:

> *"All of Camden is designated as an Air Quality Management Area due to the high concentrations of nitrogen dioxide (NO_2) and particulate matter (PM_{10}). Camden Local Plan policy CC4 seeks to ensure the impact of development on air quality is mitigated and ensures that exposure to poor air quality is reduced in the Borough. The air quality along Euston Road is identified as particularly severe.*
>
> *The submission of an Air Quality Assessment (AQA) is required where development is likely to expose residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan. Please refer to policy CC4 for more information."*

1.2.2 An Air Quality Assessment is therefore required in order to define baseline conditions and provide consideration of air quality effects associated with the scheme.

1.3 Site Location and Context

1.3.1 The Site is located at 335 Euston Road, London NW1 3AD, at approximate National Grid Reference (NGR): 529125, 182235. The Site location is shown in

1.3.2

1.3.3

1.3.4 Figure 1.

1.3.5 The Site is located in an area where air quality is mainly influenced by road traffic emissions along the local and regional road network and as such, elevated pollutant concentrations may be experienced at and around this location. Subsequently, the Proposed Development may lead to adverse impacts at nearby sensitive receptors, as a result of fugitive dust emissions during construction and road vehicle exhaust emissions during operation. As such, an AQA is required to determine potential impacts associated with the Proposed Development in accordance with the requirements of The National Planning Policy Framework (NPPF). The AQA will therefore consider ambient pollutant concentrations namely nitrogen dioxide (NO_2) and particulate matter (PM_{10} and $PM_{2.5}$) around the Site.

1.3.6 The main potential sources of air pollution were identified as emissions from road transport using the local and regional road network. There are no significant combustion sources identified within the immediate vicinity of the Site that will influence the local air quality.

1.3.1 The proposal includes the demolition of the existing single storey retail building and the construction of a new 3 storey building (plus basement) for use as a medical facility.

1.3.2 The Site is located on Euston Road within the administrative area of LBC, in a mixed residential and commercial area. The Site is bounded by neighbouring commercial and residential properties to the east and west, with the A501 Euston Road to the north.

1.3.3 The report presents the findings of an assessment of the potential air quality impacts of the Proposed Development during both the construction and operational phases. For both phases, the significance of potential impacts are identified, and measures that should be employed to minimise these are described.

2 LEGISLATION AND POLICY

2.1 Air Quality Legislation and Policy

2.1.1 A summary of the relevant air quality legislation and policy is provided below.

UK Air Quality Strategy

2.1.1 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)[1] with the latest framework for Local Authority delivery within England published in 2023[2]. The AQS provides a framework for reducing air pollution in the UK with the aim of meeting the requirements of European Union Legislation.

2.1.2 The AQS also sets standards and objectives for nine key pollutants to protect health, vegetation, and ecosystems. These are benzene (C_6H_6), 1,3 butadiene (C_4H_6), carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), particulate matter (PM_{10} and $PM_{2.5}$), sulphur dioxide (SO_2), ozone (O_3), and polycyclic aromatic hydrocarbons (PAHs).

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

2.1.4 The Air Quality Objectives (AQOs) are medium-term policy-based targets set by the Government, which take into account economic efficiency, practicability, technical feasibility and timescale. Some objectives are equal to EPAQS recommended standards or WHO guideline limits, whereas other involve a margin of tolerance, i.e., a limited number of permitted exceedances of standards over a given period.

2.1.5 **Table 1** presents the AQOs for pollutants considered within this assessment.

Table 1: National Air Quality Objectives and European Directive Limit Values for the Protection of Human Health

Pollutant	Applies to	Objective	Measured As
NO_2	UK	40µg/m^3	Annual mean
		200µg/m^3 not to be exceeded more than 18 times a year	1-hour mean

[1] Department for Environment, Food and Rural Affairs (Defra) and the Devolved Administrations (2007). The Air Quality Strategy for England, Scotland, Wales, and Northern Ireland (Volumes 1 and 2).
[2] Department for Environment, Food and Rural Affairs (Defra, 2023) Policy paper Air quality strategy: framework for local authority delivery [Online] Available at: https://www.gov.uk/government/publications/the-air-quality-strategy-for-england/air-quality-strategy-framework-for-local-authority-delivery#introduction [Accessed 15/04/2024].

Table 1: National Air Quality Objectives and European Directive Limit Values for the Protection of Human Health			
Pollutant	**Applies to**	**Objective**	**Measured As**
PM_{10}	UK (except Scotland)	40µg/m^3	Annual mean
		50µg/m^3 not to be exceeded more than 35 times a year	24-hour mean
$PM_{2.5}$	UK (except Scotland)	Interim target 12µg/m^3 by 2028 Target of 22% reduction in population exposure by 2028 compared to 2018	Annual mean

2.1.6 For the pollutants considered in this assessment, there are both long-term (annual mean) and short-term standards. In the case of NO_2, the short-term standard is for a 1-hour averaging period, whereas for PM_{10} it is 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.

Air Quality Regulations (2016)

2.1.7 Many of the objectives in the AQS have been made statutory in England with the Air Quality (England) Regulations 2000[3] and the Air Quality (England) (Amendment) Regulations 2002[4] for the purpose of Local Air Quality Management (LAQM).

2.1.8 These Regulations require that likely exceedances of the AQS objectives are assessed in relation to:

> *[…] the quality of air at locations which are situated outside of buildings or other natural or man-made structures, above or below ground, and where members of the public are regularly present […]'*

2.1.9 The Air Quality Standards (Amendment) Regulations 2016[5] amends the Air Quality Standards Regulations 2010 that transpose the European Union Ambient Air Quality Directive (2008/50/EC) into law in England. This Directive sets legally binding limit values for concentrations in outdoor air of major air pollutants that impact public health such as PM_{10}, $PM_{2.5}$ and NO_2. The limit values for NO_2 and PM_{10} are the same concentration levels as the relevant AQS objectives and the limit value for $PM_{2.5}$ is a concentration of 12µg/m^3 to be achieved by 2028.

[3] The Air Quality (England) Regulations 2000 – Statutory Instrument 2000 No.928.
[4] The Air Quality (England) (Amendment) Regulations 2002 – Statutory Instrument 2002 No.3043.
[5] The Air Quality Standards (Amendment) Regulations 2016 - Statutory Instrument 2016 No. 1184.

Environmental Protection Act 1990 – Control of Dust and Particles Associated with Construction

2.1.10 Section 79 of the Environmental Protection Act 1990[6] gives the following definitions of statutory nuisance relevant to dust and particles:

> *'Any dust, steam, smell or other effluvia arising from industrial, trade or business premises or smoke, fumes or gases emitted from premises so as to be prejudicial to health or a nuisance'; and*
>
> *'Any accumulation or deposit which is prejudicial to health or a nuisance'.*

2.1.11 Following this, Section 80 states that where a statutory nuisance is shown to exist, the local authority must serve an abatement notice. Failure to comply with an abatement notice is an offence and if necessary, the local authority may abate the nuisance and recover expenses.

2.1.12 There are no statutory limit values for dust deposition above which 'nuisance' is deemed to exist. Nuisance is a subjective concept, and its perception is highly dependent upon the existing conditions and the change which has occurred.

Environment Act 1995

2.1.13 Under Part IV of the Environment Act 1995[7], local authorities must review and document local air quality within their area by way of staged appraisals and respond accordingly, with the aim of meeting the air quality objectives defined in the Regulations. Where the objectives are not likely to be achieved, an authority is required to designate an Air Quality Management Area (AQMA). For each AQMA the local authority is required to draw up an Air Quality Action Plan (AQAP) to secure improvements in air quality and show how it intends to work towards achieving air quality standards in the future.

Clean Air Strategy (2019)

2.1.14 In 2019, the UK government released its Clean Air Strategy 2019[8], part of its 25 Year Environment Plan[9]. The Strategy sets out the comprehensive action that is considered to be required from across all parts of government and society.

[6] Environmental Protection Act. London 1990. HMSO.
[7] Environment Act 1995. London HMSO.
[8] Department for Environment, Food and Rural Affairs (2019) Clean Air Strategy 2019.
[9] Department for Environment Food and Rural Affairs (Defra) (2018) A Green Future: Our 25 Year Plan to Improve the Environment.

2.1.15 The primary focus of air quality management has primarily related to NO_2, and its principal source in the UK, road traffic. The 2019 Strategy aims to broaden the focus to other areas, including actions on clean growth, and emissions from domestic wood burning stoves, industry, and agriculture.

2.2 Planning Policy

2.2.1 A summary of the national and local planning policy relevant to the Proposed Development and air quality is provided below.

National Planning Policy Framework (2023)

2.2.2 The Government's overall planning policies for England are described in the National Planning Policy Framework[10]. 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.'*

2.2.3 One of the three overarching objectives of the NPPF is that planning should '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.'

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

- Paragraph 55, 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 105, which states 'The planning system should actively manage patters of growth in support of these objectives. 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 transport modes. This can help to reduce congestion and emissions and improve air quality and public health.';
- Paragraph 174, which states 'Planning policies and decisions should contribute to and enhance the natural and local environment by: […] e) preventing new and existing

[10] Ministry of Housing, Communities & Local Government (2023) National Planning Policy Framework.

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 185, 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 186, 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.'; and
- Paragraph 188, 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'.

2.2.5 These were reviewed and the relevant guidance considered as necessary throughout the undertaking of the assessment.

2.3 Local Planning Policy

The London Plan

2.3.1 According to The Greater London Authority's (GLA's) policy, the Mayor of London is required to publish and review a Spatial Development Strategy (SDS), which is known as the

London Plan. The London Plan 2021[11] is the overall strategic plan for London's growth in a sustainable way which runs from 2019 to 2041. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. It has been stated that:

> *"The London Plan is legally part of each of London's Local Planning Authorities' Development Plan and must be taken into account when planning decisions are taken in any part of Greater London."*

2.3.2 The London Local Plan identified the following core policy of relevance to air quality:

> *"**Policy SI 1 - Improving Air Quality***
>
> *A- Development plans, through relevant strategic, site specific and area-based policies should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.*
>
> *B- To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed.*
>
> *1) Development proposals should not:*
>
> *a) lead to further deterioration of existing poor air quality*
>
> *b) create any new areas that exceed air quality limits, or delay the date which compliance will be achieved in areas that are currently in exceedance of legal limits*
>
> *c) create unacceptable risk of high levels of exposure to poor air quality.*
>
> *2) In order to meet the requirements of Part 1, as a minimum:*
>
> *a) Development proposals must be at least Air Quality Neutral*
>
> *b) Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retrofitted mitigation measures*

[11] Mayor of London: The London Plan: The Spatial Development Strategy for Greater London, March 2021.

c) *Major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1.*

d) *Development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people, should demonstrate that design measures have been used to minimise exposure.*

C- Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality assessment. To achieve this a statement should be submitted demonstrating:

1) *How proposals have considered ways to maximise benefits to local air quality, and,*

2) *What measures or design features will be put in place to reduce exposure to pollution, and how often they will achieve this.*

D- In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.

E- Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.'

2.3.3 The requirements of this policy have been considered throughout this AQA.

Sustainable Design and Construction Supplementary Planning Guidance (2014)

2.3.4 The Sustainable Design and Construction Planning Guidance (SPG)[12] was published by the GLA in April 2014. The document aims to support developers, local planning authorities and

[12] Sustainable Design and Construction SPG, GLA, 2014.

neighbourhoods to achieve sustainable development, as well as proving guidance on how to achieve the London Plan objectives effectively.

2.3.5 The document provides guidance on the following key areas when undertaking an Air Quality Assessment:

- Assessment requirements;
- Construction and demolition;
- Design and occupation;
- Air Quality Neutral policy for buildings and transport; and,
- Emissions standards for combustion plant.

2.3.6 These key areas were taken into consideration during the undertaking of this assessment.

London Local Air Quality Management Technical Guidance (2019)

2.3.7 The GLA has published technical guidance for use by London authorities in their review and assessment work. This guidance, referred to in this document as LLAQM.TG19[13], has been used where appropriate in the assessment presented herein.

2.3.8 Although the LLAQM technical guidance is based on the national LAQM technical guidance, it does incorporate London-specific elements to the review and assessment process.

Camden Local Plan

2.3.9 The Camden Local Plan[14] sets out the Council's planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). It ensures that Camden continues to have robust, effective and up to-date planning policies that respond to changing circumstances and the borough's unique characteristics and contribute to delivering the Camden Plan and other local priorities. The Local Plan will cover the period from 2016-2031.

2.3.10 The following policy is of relevance to both air quality and the Proposed Development:

[13] Greater London Authority (GLA) (2019) London Local Air Quality Management (LLAQM) Technical Guidance 2019 (LLAQM.TG (19)).
[14] London Borough of Camden (2017) Camden Local Plan. Available at https://www.camden.gov.uk/documents /20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6 [Accessed 06/05/2024].

*"**Policy CC4 Air quality***

The Council will ensure that the impact of development on air quality is mitigated to ensure that exposure to poor air quality is reduced in the borough.

The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Consideration must be taken to the actions identified in the Council's Air Quality Action Plan.

Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Similarly, developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact.

Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.

Camden Clean Air Strategy 2019 – 2034 and Camden Clean Air Action Plan

2.3.11 The Camden Clean Air Strategy 2019 – 2034 and Camden Clean Air Action Plan[15] sets out Camden's approach for improving air quality and protecting health from exposure to air pollution in Camden.

2.3.12 The Clean Air Strategy sets out objectives for realising the vision for the borough in which no person experiences poor health as a result of the air they breathe.

2.3.13 The Camden Clean Air Action Plan 2023 – 2026 describes the actions that will take place over the 2023 – 2026 period, following on from the previous plan.

2.3.14 The contents of the strategy and plan have been considered throughout this assessment.

[15] London Borough of Camden (December 2022). Camden Clean Air Strategy 2019-2034 and Camden Clean Air Action Plan 2023-2026. Available at https://www.camden.gov.uk/documents/20142/0/Camden+Clean+Air+Action+Plan+2023-2026_Final_2022.12.19+%282%29.pdf/ad618e94-0113-696d-5fc6-104d8969ab5a?t=1671619123044 [Accessed 06/05/2024].

2.4 National Planning Guidance

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

Land-Use Planning & Development Control: Planning for Air Quality (2017)

2.4.2 Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) have published guidance[16] 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.

The Control of Dust and Emissions during Construction and Demolition (2014)

2.4.3 The GLA has published SPG on the Control of Dust and Emissions from Construction and Demolition[17] to reduce pollutants emissions including dust, PM_{10} and $PM_{2.5}$ from construction and demolition activities in London, and to reduce NO_X emissions from construction and demolition machinery. The SPG outlines guidance on methodology for assessing the air quality impacts of construction and demolition in London and determine the mitigation measures that will need to be applied to protect human health and the environment.

National Planning Practice Guidance – Air Quality (2019)

2.4.4 This guidance[18] provides a number of guiding principles on how the planning process can take into account the impact of new development on air quality, it 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 taken into account 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.

[16] Environmental Protection UK and Institute of Air Quality Management (Version 1.2 Updated January 2017) Land Use Planning & Development Control: Planning for Air Quality.
[17] Mayor of London (2014) The Control of Dust and Emissions from Construction and Demolition SPG Adopted July 2014 [Online] Available at https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Dust%20and%20Emissions%20SPG%208%20July%202014_0.pdf?token=zV3ZKTpP [Accessed 15/04/2024].
[18] Department of Communities and Local Government (DCLG) (Updated November 2019) National Planning Practice Guidance.

3 SCOPE AND METHODOLOGY

3.1 Scope

3.1.1 The scope of the assessment has been determined in the following way:

- A review of the Masterplan of the Proposed Development;
- Desktop study to confirm the locations of nearby existing receptors that may be sensitive to changes in local air quality; and
- Review of LBC's latest available Air Quality Annual Status Report[19] (ASR) and air quality data surrounding the Site including data from Defra[20] and the Environment Agency (EA)[21];

3.1.2 The scope of the assessment includes consideration of the potential impact on local air quality resulting from:

- Dust and particle matter generated by on-site activities during the construction phase;
- Increases in pollutant concentrations as a result of exhaust emissions arising from construction traffic and plant; and
- Increases in pollutant concentrations as a result of exhaust emissions arising from traffic generated by the Proposed Development once operational.

3.2 Construction Phase Assessment

3.2.1 Dust comprises particles typically in the size range of 1-75 micrometres (µm) in aerodynamic diameter and is created through the action of crushing and abrasive forces on materials. The larger dust particles fall out of the atmosphere quickly after initial release and therefore tend to be deposited in close proximity to the source of emission. Dust, therefore, is unlikely to cause long term or wide-spread changes to air quality. However, it's deposition on property and cars can cause 'soiling' and discolouration. This may result in complaints of nuisance through amenity loss or perceived damage caused, which is usually temporary.

3.2.2 The smaller particles of dust are known as particulate matter (PM), with less than 10µm in aerodynamic diameter (PM_{10}) representing only a small proportion of total dust released; this includes a finer fraction, known as $PM_{2.5}$ (with an aerodynamic diameter less than 2.5µm). As

[19] London Borough of Camden (2023). London Borough of Camden Air Quality Annual Status Report for 2022 [Online] Available at https://www.camden.gov.uk/air-quality#mczc [Accessed on 06/05/2024].
[20] Department for Environment, Food and Rural Affairs (Defra) Local Air Quality Management (LAQM) Support Pages [Online] Available at https://laqm.defra.gov.uk/ [Accessed 15/04/2024].
[21] Department for Environment, Food and Rural Affairs (Defra, 2022) Pollution Inventory [Online] Available at https://data.gov.uk/dataset/cfd94301-a2f2-48a2-9915-e477ca6d8b7e/pollution-inventory [Accessed 06/05/2024].

these particles are at the smaller end of the size range of dust particles, they remain suspended in the atmosphere for a longer period of time than the larger dust particles. $PM_{2.5}$ can therefore be transported by wind over a wider area. PM_{10} and $PM_{2.5}$ are small enough to enter the lungs during breathing, which in sensitive members of the public could have a potential impact on health. However, it is worth noting that, according to the SPG guidance, the majority of fugitive particulate emissions arising from construction sites are expected to relate to the coarser fractions (i.e., $PM_{2.5-10}$) with just 10-15% expected to comprise $PM_{2.5}$. The SPG guidance therefore focusses on PM_{10} for the purposes of assessment.

3.2.3 An assessment of the likely significant impacts on local air quality due to the generation and dispersion of dust and PM_{10} during the construction phase has been undertaken using: the relevant assessment methodology published by the SPG; the available information for this phase of the Proposed Development provided by the Client and/or Project Team; and supported by the professional judgement of the NoiseAir team.

3.2.4 The SPG methodology provides a framework to ensure that assessments are more consistent and consider the full range of potential impacts. This guidance assesses the risk of potential dust and PM_{10} impacts from the following four sources:

- Demolition;
- Earthworks;
- Construction; and
- Trackout.

3.2.5 It takes into account the nature and scale of the activities undertaken for each source and the sensitivity of the area to an increase in PM_{10} levels to assign a level of risk. Risks are described in terms of there being a low, medium or high risk of dust impacts. Once the level of risk has been identified, and the significance of residual effects determined. A summary of the SPG assessment methodology is provided in **Appendix C**.

3.2.6 In addition to the impacts on local air quality due to on-site construction activities, exhaust emissions from construction vehicles and plant may have an impact on local air quality adjacent to the routes used by these vehicles to access the application Site and in the vicinity of the application Site itself. As information on the number of vehicles and plant associated with the construction phase was not available at the time of writing, a qualitative assessment of their impact on local air quality has been undertaken using professional judgement and considering the following:

- The number and type of construction traffic and plant likely to be generated by this phase of the Proposed Development;
- The number and proximity of sensitive receptors to the application Site and along the likely routes to be used by construction vehicles; and
- The likely duration of the construction phase and the nature of the construction activities undertaken.

3.3 Operational Phase Assessment

3.3.1 The Proposed Development has the potential to expose future users to any existing air quality issues.

3.3.2 The EPUK & IAQM guidance sets out two stages for determining when an assessment of potential impacts on the local area is likely to be necessary. The Stage 1 criteria for an AQA is presented below:

A. If any of the following apply:

- 10 or more residential units or a site area of more than 0.5ha; or
- More than 1,000 m^2 of floor space for all other uses or a site area greater than 1ha.

B. Coupled with any of the following:

- The development has more than 10 parking spaces; or,
- The development will have a centralised energy facility or other centralised combustion process.

3.3.3 Should these criteria not be met, then the EPUK and IAQM guidance considers air quality impacts associated with a scheme to be negligible and no further assessment is required. Should the criteria be met or exceeded, proceed to Stage 2. Stage 2 of the EPUK & IAQM guidance document states the following criteria to help establish when an AQA is likely to be considered necessary:

- Proposals that will cause a change in Light Duty Vehicle (LDV) flows of more than 100 AADT within or adjacent to an AQMA or more than 500 elsewhere.
- Proposals that will cause a change in HDV flows of more than 25 AADT within or adjacent to an AQMA or more than 100 elsewhere.
- Proposals that would realign roads within an AQMA by more than 5m;
- Proposals that will introduce new junctions or remove existing junctions near relevant receptors.
- Proposals that will introduce or change a bus station or change flows of buses by more than 25 AADT within an AQMA or more than 100 AADT elsewhere.

- Proposals which will include an underground car park with extraction system which will be within 20m of a relevant receptor and have more than 100 movements per day.
- Proposals which include either a centralised plant using biofuel, a combustion plant with single or thermal input >300KWh or a standby emergency generator associated with a centralised energy centre; and,
- Proposals which include combustion processes of any size.

3.3.4 Should these criteria not be met, then the EPUK and IAQM guidance documents consider air quality impacts associated with a scheme to be not significant and no further assessment being required.

3.3.5 Should screening of the above indicate that any of the above criteria are met, then potential impacts at sensitive receptor locations can be assessed by calculating the predicted change in pollutant concentrations as a result of the Proposed Development.

3.3.6 The significance of predicted impacts can then be determined in accordance with the methodology outlined in the EPUK and IAQM guidance.

3.4 Selection of Sensitive Receptors

3.4.1 Sensitive locations are places where the public or sensitive ecological habitats may be exposed to pollutants resulting from activities associated with the Proposed Development. These will include locations sensitive to an increase in dust deposition and PM_{10} exposure as a result of on-site construction activities, and locations sensitive to exposure to gaseous pollutants emitted from the exhausts of construction and operational traffic associated with the Proposed Development.

Construction Phase

3.4.2 The SPG assessment is undertaken where there are:

- ‘human receptors’ within 50 m of the site boundary, all within 50 m of the route(s) used by construction vehicles on the public highway, up to 500 m from the site entrance(s); and/or
- ‘ecological receptors’ within 50 m of the site boundary, or within 50 m of the route(s) used by construction vehicles on the public highway, up to 500 m from the site entrance(s).

3.4.3 It is within these distances that the impacts of dust soiling and increased particulate matter in the ambient air will have the greatest impact on local air quality at sensitive receptors. For

specific (high risk) schemes the planning authority may require dust assessment despite the proposed site falling outside the distances above.

Operational Phase

3.4.4 In terms of locations that are sensitive to pollutants emitted from engine exhausts, these will include places where members of the public are likely to be regularly present over the period of time and prescribed in the AQS. An example would be on a footpath where exposure will be transient (for the duration of passage along that path) comparison with a short-term standard (i.e., 15-minute or 1-hour mean) maybe relevant. At a school or adjacent to a private dwelling, where exposure maybe for longer periods, comparison with a long-term standard (such as 24-hour mean or annual mean) maybe more appropriate. Box 1.1 of LAQM.TG.22 provides examples of the locations where the air quality objectives should/ should not apply.

3.5 Significance Criteria

Construction Phase

3.5.1 The London SPG assessment methodology recommends that significance criteria is only assigned to the identified risk of dust impacts occurring from a construction activity with appropriate mitigation measures in place. 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.

3.5.2 For the assessment of the impact of exhaust emissions from plant used on-site and construction vehicles accessing and leaving the Site on local concentrations of NO_2 and particulate matter; the significance of residual effects has been determined using professional judgement and the principles outlined in the London SPG guidance, which are described below.

Operational Phase

3.5.3 The approach provided in the EPUK & IAQM guidance has been used within this assessment to assist in describing the air quality effects of additional emissions from traffic generated by the Proposed Development once operational.

Future Exposure

3.5.4 The Proposed Development is within an AQMA, and its use falls within the scope for an exposure assessment to be undertaken in accordance with the EPUK and IAQM guidance,

the use of the Site, its distance from major pollutant sources and professional judgement. Whilst it is not a facility that will host patients overnight, staff working at the facility will be exposed for significant periods of time over their working day.

Selection of Background Concentrations

3.5.5 Background pollutant data for the operational phase assessment have been taken from the national maps provided on the Defra[22] website, where background concentrations of those pollutants included within the AQS have been mapped at a grid resolution of 1x1 km for the whole of the UK. Estimated background concentrations all available for all years between 2018 and 2030. The maps assume that background concentrations will improve (i.e., reduce) overtime, in line with the predicted reduction in vehicle emissions, and emissions from other sources. 2022 background concentrations for NO_2, PM_{10} and $PM_{2.5}$ have been utilised in this assessment for the opening year. This provides a robust assessment and is likely to overestimate pollutant concentrations during the operation of the Proposed Development.

[22] Department for Environment, Food and Rural Affairs (Defra) (2020) Background Concentrations [Online] Available at https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018 [Accessed on 06/05/2024].

4 BASELINE

4.1 Introduction

4.1.1 Existing air quality conditions in the vicinity of the Site were identified in order to provide a baseline for assessment. These are detailed in the following Sections.

4.2 Local Air Quality Management

4.2.1 As required by the Environment Act (1995), LBC has undertaken review and assessment of air quality within their area of jurisdiction. In 2021, LBM monitored NO_2 at five automatic monitoring location and a network of 315 non-automatic monitors.

4.2.2 An Air Quality Management Area (AQMA) was declared in 2002 covering the whole borough, for measured exceedances of the NO_2 annual mean and the PM_{1o} 24-hour mean objectives.

4.2.3 The Site is therefore located within the boroughwide AQMA.

4.3 Air Quality Monitoring

4.3.1 Monitoring of pollutant concentrations is undertaken by LBC throughout their area of jurisdiction. Recent non-automatic monitoring for NO_2 within 750m of the Site is shown in **Table 2** and presented in

4.3.2

4.3.3

4.3.4 Figure 1. Exceedances of the AQO are shown in **bold**.

Table 2: Non-automatic Monitoring Results - NO_2							
Monitoring Site		Road Type	Distance to Kerb of Nearest Road (m)	Monitored NO_2 Concentration ($\mu g/m^3$)			
				2019	2020	2021	2022
CAM46	HSS Phase 3-5 Nestley Primary School – William Road	Roadside	<0.5	-	-	23.76	22.87
CAM216	WEP 1 – Warren Street (5)	Roadside	<0.5	**53.8**	**50.93**	31.36	-
CAM217	WEP 2 – Grafton Way (40)	Roadside	<0.5	**54.1**	**42.19**	35.13	-
CAM230	WEP 15 – Gower Street (136)	Roadside	<0.5	**55.31**	32.34	32.1	-

4.3.5 **Table 2** shows that the measured annual mean NO_2 concentrations in the Borough have previously exceeded the relevant AQO at roadside locations in recent years, prior to the impacts of the COVID-19 impacts on travel behaviours. Monitoring ceased at these location in 2022. Therefore, it is not possible to determine if concentrations have went above the AQO since the end of the pandemic.

4.4 Background Pollutant Concentrations

4.4.1 Predictions of background pollutant concentrations on a 1 km-by-1 km basis have been produced by DEFRA for the entire UK to assist local authorities in their Review and Assessment of air quality. The Site is located in grid square 529500, 182500. Data for this location is summarised in **Table 3**.

Table 3: Predicted Background Pollutant Concentrations						
OS Grid Reference (X, Y; m)	Predicted Background Pollutant Concentration ($\mu g/m^3$)					
	2022			2025		
	NO_2	PM_{10}	$PM_{2.5}$	NO_2	PM_{10}	$PM_{2.5}$
529500, 182500	35.4	19.1	12.2	33.1	18.5	11.7

Table 3: Predicted Background Pollutant Concentrations
Rounded to 1 d.p.

4.4.2 As shown in **Table 3**, predicted background NO_2, and PM_{10}, concentrations are well below the relevant AQOs across the assessment extents in 2022 and 2025, the earliest possible opening year. Whilst the $PM_{2.5}$ concentration was projected to be above the interim target in 2022, it is projected to be below in 2025.

4.5 London Atmospheric Emissions Inventory

4.5.1 The London Atmospheric Emissions Inventory (LAEI) pollution maps[23] provide modelled estimates of 2019 baseline annual mean NO_2, PM_{10} and $PM_{2.5}$ in 20m grids for the entire area of Greater London.

4.5.2 There is one grid point within the Site boundary of the Proposed Development. LAEI modelled concentrations for this grid point shown below in **Table 4**. Exceedances of the AQO are shown in **bold**.

Table 4: LAEI Modelled Pollutant Concentrations (µg/m^3)		
Pollutant	**529120, 182240**	**Objective**
NO_2	**63.4**	**40.0**
PM_{10}	33.0	**40.0**
$PM_{2.5}$	16.4	**12.0***
Rounded to 1 d.p. *Interim target to be met by 2028.		

4.5.3 As shown in **Table 4**, during 2019 LAEI modelled pollutant concentrations were below the relevant AQOs at the single point located within the Site boundary for PM_{10} and $PM_{2.5}$. As air quality is generally improving year on year, pollutant concentrations can be assumed to be below those presented above across the development extents.

4.5.4 The NO_2 concentration was projected to be above the AQO, not only for the annual mean objective, but also for the hourly mean objective.

[23] London Atmospheric Emissions Inventory, 2019. Annual Pollution Maps, Kings College London on behalf of Greater London Authority.

5 ASSESSMENT

5.1 Construction Phase Assessment

5.1.1 Construction activities that have the potential to generate and/ or re-suspend dust and PM_{10}. Activities include:

- Site clearance and preparation including demolition activities;
- Preparation of temporary access/ egress to the Site and haulage routes;
- Earthworks;
- Materials handling, storage, stockpiling, spillage and disposal;
- Movement of vehicles and construction traffic within the Site (including excavators and dumper trucks);
- Use of crushing and screening equipment/ plant;
- Exhaust emissions from plant, especially when used at the extremes of their capacity and during mechanical breakdown;
- Construction of buildings, roads and areas of hard standing alongside fabrication processes;
- Internal and external finishing and refurbishment;
- Trackout, whereby earth is carried from the Site on vehicle tyres, deposited on roads and may later become suspended in the air as a result of vehicle movements; and
- Site landscaping after completion.

5.1.2 Most of the releases are likely to occur during the 'working week'. However, for some potential release sources (e.g., exposed soil produced from significant earthworks activities) in the absence of dust control mitigation measures, dust generation has the potential to occur 24 hours per day over the period during which such activities take place.

Assessment of Potential Dust Emission Magnitude

5.1.3 The SPG assessment methodology has been used to determine the potential dust emission magnitude for the following four different dust and PM_{10} sources:

- Demolition;
- Earthworks;
- Construction; and
- Trackout.

5.1.4 The findings of the assessment are presented below.

Demolition

5.1.5 The existing single storey building on Site will be demolished as part of the proposals. It is a relatively small building and as such the total building volume to be demolished is assumed to be less than 20,000m^3. Therefore, the potential dust emission magnitude from demolition activities is considered to be **small**.

Earthworks

5.1.6 The total area of the Site is approximately 75m^2, less than the 2,500m^2 criteria outlined by the GLA guidance. Given this very small area, the potential dust emission magnitude is considered to be **small** for earthworks activities, to present a robust worst-case scenario.

Construction

5.1.7 The total building to be constructed is assumed to be less than 25,000m^3. As such, and to ensure a conservative approach, the potential dust emission magnitude from construction activities is considered to be **small**.

Trackout

5.1.8 It has been assumed that given the size of the Proposed Development area and scale of the proposals, it is considered that there will be less than 10 HDV outward movements in any one day. The potential dust emission magnitude from trackout activities is therefore considered to be **small**.

5.1.9 **Table 5** provides a summary of the potential dust emission magnitude determined for each construction activity considered.

Table 5: Potential Dust Emission Magnitude

Activity	Dust Emission Magnitude
Demolition	Small
Earthworks	Small
Construction	Small
Trackout	Small

Assessment of Sensitivity of the Study Area

5.1.10 The prevailing wind direction is predominantly from the southwest. Therefore, receptors located to the northeast of the Site are more likely to be affected by dust and particulate matter emitted and re - suspended during the construction phase.

5.1.11 Under lower wind speed conditions, it is likely that the majority of the dust would be deposited in the area immediately surrounding the source. Receptors northeast of the Site are expected to be affected the most as a result of the prevailing wind direction. It has been assumed that the construction traffic will access the Site via Euston Road from the east.

5.1.12 There are no ecological receptors within 50m of the Site boundary or access route, or within 50m of the Site entrance as identified using Multi Agency Geographic Information for the Countryside (MAGIC) website[24]. The closest ecological receptor is the Camley Street Nature Park Local Nature Reserve that is approximately 1.4km northeast of the Site. Local Nature Reserves do not normally include features that are sensitive to dust deposition, and Camley Street Nature Park is used for recreational pursuits such as dog walking, walking and picnicking. As such, ecological impacts have not been assessed further within this report.

5.1.13 Taking the above into account and following the London SPG assessment methodology, the sensitivity of the area to changes in dust and PM_{10} has been derived for each of the construction activities considered. The results are shown in **Table 6**.

Table 6: Sensitivity of the Study Area

Potential Impact	Sensitivity of the Surrounding Area			
	Demolition	Earthworks	Construction	Trackout
Dust Soiling	High	High	High	High
Human Health	Low	Low	Low	Low

Risk of Impacts

5.1.14 The predicted dust emission magnitude has been combined with the defined sensitivity of the area to determine the risk of impacts during the construction phase, prior to mitigation. **Table 7** below provides a summary of the risk of such impacts for the Proposed Development. The risk category identified for each construction activity has been used to determine the level of mitigation required.

[24] Department for Environment, Food and Rural Affairs (Defra) (2024) Multi-Agency Geographic Information for the Countryside (MAGIC) [Online] https://magic.defra.gov.uk/ [Accessed on 06/05/2024].

Table 7: Summary Dust Risk Table Defining Site Specific Mitigation				
Potential Impact	**Dust Emission Risk**			
	Demolition	**Earthworks**	**Construction**	**Trackout**
Dust Soiling	Medium	Medium	Medium	Medium
Human Health	Negligible	Negligible	Negligible	Negligible

Construction Vehicles and Plant

5.1.15 The greatest impact on air quality is emissions from vehicles and plant associated with the construction phase will be in the areas immediately adjacent to the Site access road. Construction traffic will access the Site via the local road network. Due to the size of the Site, it is considered likely that the construction traffic will be low in comparison to the existing traffic flows on these roads.

5.1.16 Final details of the exact plant and equipment likely to be used on-site will be determined by the appointed contractor.

5.1.17 Based on the current local air quality in the area, the proximity of sensitive receptors to the roads likely to be used by construction vehicles, and the likely numbers of construction vehicles and plant that will be used, the impacts are therefore considered to be **negligible** in accordance with the assessment significance criteria.

5.2 Operational Phase Assessment

Potential Development Impacts

5.2.1 Vehicle movements associated with the operation of the Proposed Development will generate exhaust emissions on the local and regional road networks.

5.2.2 A screening assessment has been conducted based on Stage 1 of the EPUK & IAQM criteria. As the Proposed Development proposes a small medical facility with no new parking spaces, and no new centralised energy facility or other combustion process. Therefore, the proposals do not meet the Stage 1 criteria. The EPUK & IAQM guidance considers air quality impacts associated with the scheme to be **negligible** and no further assessment is required.

Potential Future Exposure

5.2.3 The Proposed Development does however include land use sensitive to long term and short-term pollutant concentrations. As such, an assessment was therefore undertaken using available data, to assess the Site's suitability for its intended use.

Local Monitoring Results

5.2.4 As shown in **Table 2**, the monitoring locations within 350m of the Site have monitored exceedances in recent years. These monitoring locations are within the existing AQMA, some of which are located on busier roads. Monitoring ceased at a number of these locations in 2022, meaning more recent data following the impact of the COVID-19 pandemic on travel behaviours is unavailable.

5.2.5 Based on the above, exceedances of the relevant AQO's are considered possible across the Site.

Background Pollutant Concentration Predictions

5.2.6 As shown in **Table 3**, background pollutant concentrations for the grid square containing the Site are predicted to be well below the annual mean AQOs for NO_2, and PM_{10} in 2022 and 2025 (the earliest opening year).

5.2.7 Whilst the $PM_{2.5}$ concentration was projected to be above the interim target in 2022, it is projected to be below in 2025.

5.2.8 Based on the predicted background concentrations, exceedances of the relevant AQOs are considered possible at the Site.

LAEI Concentrations

5.2.9 As shown in **Table 4**, PM_{10} and $PM_{2.5}$ concentrations are projected to be below the AQO's. However, the projected NO_2 concentration is significantly above the AQO.

Summary

5.2.10 It is considered that pollutant concentrations could be above the relevant AQOs at the Proposed Development for the following reasons:

- Local monitoring results indicate annual mean NO_2 concentrations could be above the relevant AQO at the Site;
- Predicted background concentrations are below the relevant AQOs in the opening year; and
- LAEI concentrations are above the relevant AQO's for NO_2.

5.2.11 Based on the assessment results, exposure of future Site users to exceedances of the AQOs is considered likely, without mitigation. Whilst it could be argued that the Site would not

expose users for long enough from an annual mean perspective, the LAEI projections are so high that hourly mean objectives for NO_2 could be breached.

5.2.12 It has not been possible to undertake detailed dispersion modelling to determine if this case due to the lack of detailed traffic flows and representative monitoring. Whilst this could be obtained and/or monitoring could be undertaken, this would be a costly and time consuming exercise. It is therefore our view that funds would be better being directed towards mechanical ventilation and/or other onsite mitigation measures to bring indoor air quality levels down to acceptable levels.

Summary

5.2.13 Based on the extent of predicted population exposure to the impacts on pollutant concentrations and the guidance provided by the EPUK & IAQM, the Site is considered suitable for its intended use, subject to appropriate onsite mitigation such as mechanical ventilation.

6 MITIGATION AND RESIDUAL EFFECTS

6.1 Construction Phase

6.1.1 Based on the construction phase assessment results showing the Site poses a maximum of 'Medium risk' for potential dust emissions, mitigation will be required for this phase. Mitigation measures recommended by the SPG for 'Medium risk' sites are presented below:

Site Management

- Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.
- Develop a Dust Management Plan.
- Display the name and contact details of person(s) accountable for air quality pollutant emissions and dust issues on the site boundary.
- Display the head or regional office contact information.
- Record and respond to all dust and air quality pollutant emissions complaints.
- Make a complaints log available to the local authority when asked.
- Carry out regular site inspections to monitor compliance with air quality and dust control procedures, record inspection results, and make an inspection log available to the local authority when asked.
- Increase the frequency of site inspections by those accountable for dust and air quality pollutant emissions issues when activities with a high potential to produce dust and emissions and dust are being carried out, and during prolonged dry or windy conditions.
- Record any exceptional incidents that cause dust and air quality pollutant emissions, either on or off the site, and the action taken to resolve the situation is recorded in the log book.

Preparing and maintaining the site:

- Plan site layout: machinery and dust causing activities should be located away from receptors.
- Erect solid screens or barriers around dust activities or the site boundary that are, at least, as high as any stockpiles on site.
- Fully enclosure site or specific operations where there is a high potential for dust production and the site is active for an extensive period.
- Avoid site runoff of water or mud.
- Keep site fencing, barriers and scaffolding clean using wet methods.

- Remove materials from site as soon as possible.
- Cover, seed or fence stockpiles to prevent wind whipping.
- Agree monitoring locations with the Local Authority.
- Where possible, commence baseline monitoring at least three months before phase begins.
- Put in place real-time dust and air quality pollutant monitors across the site and ensure they are checked regularly.

Operating vehicle/ machinery and sustainable travel

- Ensure all on-road vehicles comply with the requirements of the London Low Emission Zone.
- Ensure all non-road mobile machinery (NRMM) comply with the standards set within this guidance.
- Ensure all vehicles switch off engines when stationary – no idling vehicles.
- Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where possible.
- Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.
- Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).

Operations

- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.
- Ensure an adequate water supply on the site for effective dust/particulate matter mitigation (using recycled water where possible).
- Use enclosed chutes, conveyors and covered skips.
- Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.
- Ensure equipment is readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.

Waste Management

- Reuse and recycle waste to reduce dust from waste materials.
- Avoid bonfires or burning of waste materials.

Demolition

- Ensure water suppression is used during demolition operations.
- Avoid explosive blasting, using appropriate manual or mechanical alternatives.
- Bag and remove any biological debris or damp down such material before demolition.

Construction

- Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.

Trackout

- Regularly use a water-assisted dust sweeper on the access and local roads, as necessary, to remove any material tracked out of the site.
- Avoid dry sweeping of large areas.
- Ensure vehicles entering and leaving sites are securely covered to prevent escape of materials during transport.
- Record all inspections of haul routes and any subsequent action in a site log book.
- Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems and regularly cleaned.
- Inspect haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable;
- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).
- Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.
- Access gates to be located at least 10m from receptors where possible.

6.1.2 Detailed mitigation measures to control construction traffic should be discussed with the Local Authority to establish the most suitable access and haul routes for the Site traffic. The most effective mitigation will be achieved by ensuring that construction traffic does not pass along sensitive roads (i.e., congested roads, residential roads, or unsuitable junctions for large vehicles) where possible. Construction vehicles should be kept clean through the use

of wheel washers and sheeted when on public highways. Timing of large- scale vehicle movements to avoid peak hours on the local road network would also be of benefit.

Residual Effects

6.1.3 The residual effects of dust and PM_{10} generated by construction activities following the application of the mitigation measures described above and good Site practice is considered to be **not significant**.

6.1.4 The residual effects of emissions to air from construction vehicles and plant on local air quality is considered to be **not significant**.

6.2 Operational Phase

6.2.1 Given the anticipated breach of the hourly mean NO_2 objective, mechanical ventilation and/or other onsite mitigation measures to bring indoor air quality levels down to acceptable levels is highly recommended.

7 AIR QUALITY NEUTRAL ASSESSMENT

7.1 Introduction

7.1.1 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[25] has been produced on behalf of the 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 offsetting.

7.1.2 The GLA have recently issued an update to the existing guidance. The document[26] 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.

7.1.3 The Air Quality Neutral Assessment for the Proposed Development is outlined below.

7.2 Building Emissions

7.2.1 Details of space heating is not currently available. Providing this is sourced electrically, or from a gas boiler which emits less than 40µg/m^3, the Proposed Development can be assumed to be air quality neutral from a Building Emissions perspective, in accordance with the GLA guidance.

7.3 Transport Emissions

7.3.1 The Proposed Development will provide no additional parking spaces at the Site. As such, the Proposed Development can be considered air quality neutral from a Transport Emissions perspective, in accordance with the GLA guidance.

7.4 Summary

7.4.1 Potential emissions from the development were assessed in order to determine compliance with the air quality neutral requirements of the London Plan. The proposals include heating through electric panel heaters and air source heat pumps, and do not provide parking spaces at the Site above the parking standards outlined in the London Plan. As such, the proposals are considered to be air quality neutral from both a Building and Transport Emissions perspective.

[25] Air Quality Neutral Planning Support Update: GLA 80371, Air Quality Consultants and Environ, 2014.
[26] London Plan Guidance - Air Quality Neutral, GLA, 2023.

8 CONCLUSIONS

8.1.1 NoiseAir Limited have carried out an AQA in support of a proposed development at 335 Euston Road, London to provide a medical facility.

8.1.2 A qualitative assessment of the potential impacts on local air quality from construction activities has been carried out for this phase of the Proposed Development using the SPG methodology. This identified that there is a maximum of **Medium risk** of dust soiling impacts and a **negligible risk** of increases in particulate matter concentrations due to unmitigated construction activities for human health. However, through good site practice and the implementation of suitable mitigation measures, the effect of dust and particulate matter releases would be significantly reduced. The residual effects of dust and particulate matter generated by construction activities on air quality are therefore considered to be **not significant**. The residual effects of emissions to air from construction vehicles and plant on local air quality is considered to be **not significant**.

8.1.3 Based on the guidance provided by the EPUK & IAQM, the Proposed Development is expected to result in a **negligible** impact associated with operational phase traffic on nearby receptors, and the residual effects are considered to be **not significant**.

8.1.4 The potential for exposure of future Site users to exceedances of the AQO was assessed based on local monitoring results, predicted background concentrations, proximity to pollution sources and AQMA designations. This indicated that concentrations of PM_{10}, and $PM_{2.5}$ are likely to be below the relevant AQO at the Site. Concentrations of NO_2 could be above both the annual mean and hourly mean AQO's. Therefore, mechanical ventilation is highly recommended to mitigate the potential effects.

8.1.5 The air quality neutral assessment has identified that the Proposed Development is considered to be 'Air Quality Neutral' in relation to both building and transport emissions, as electric panel heaters and air heat pumps are to be used for heating and the number of car parking spaces provided at the Site falls below the standards set out in the London Plan. Therefore, no further action will be required.

8.1.6 It is considered that the Proposed Development complies with national and local policy for air quality, subject to appropriate mitigation measures being effectively implemented.

8.1.7 Based on the assessment results, air quality issues are not considered a constraint to planning consent for this proposal, subject to appropriate mitigation measures being effectively implemented..

FIGURES

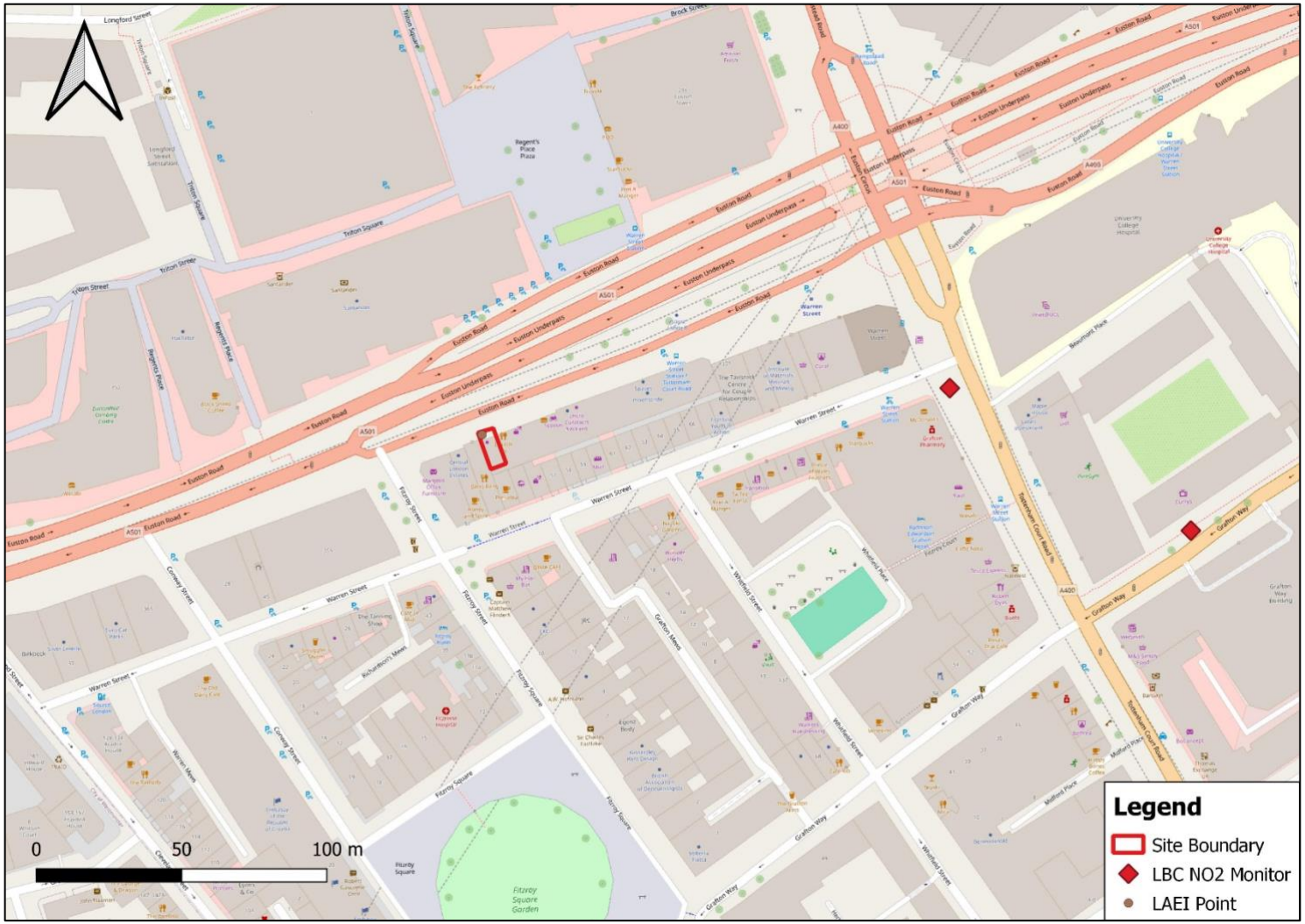


Figure 1 Site Location

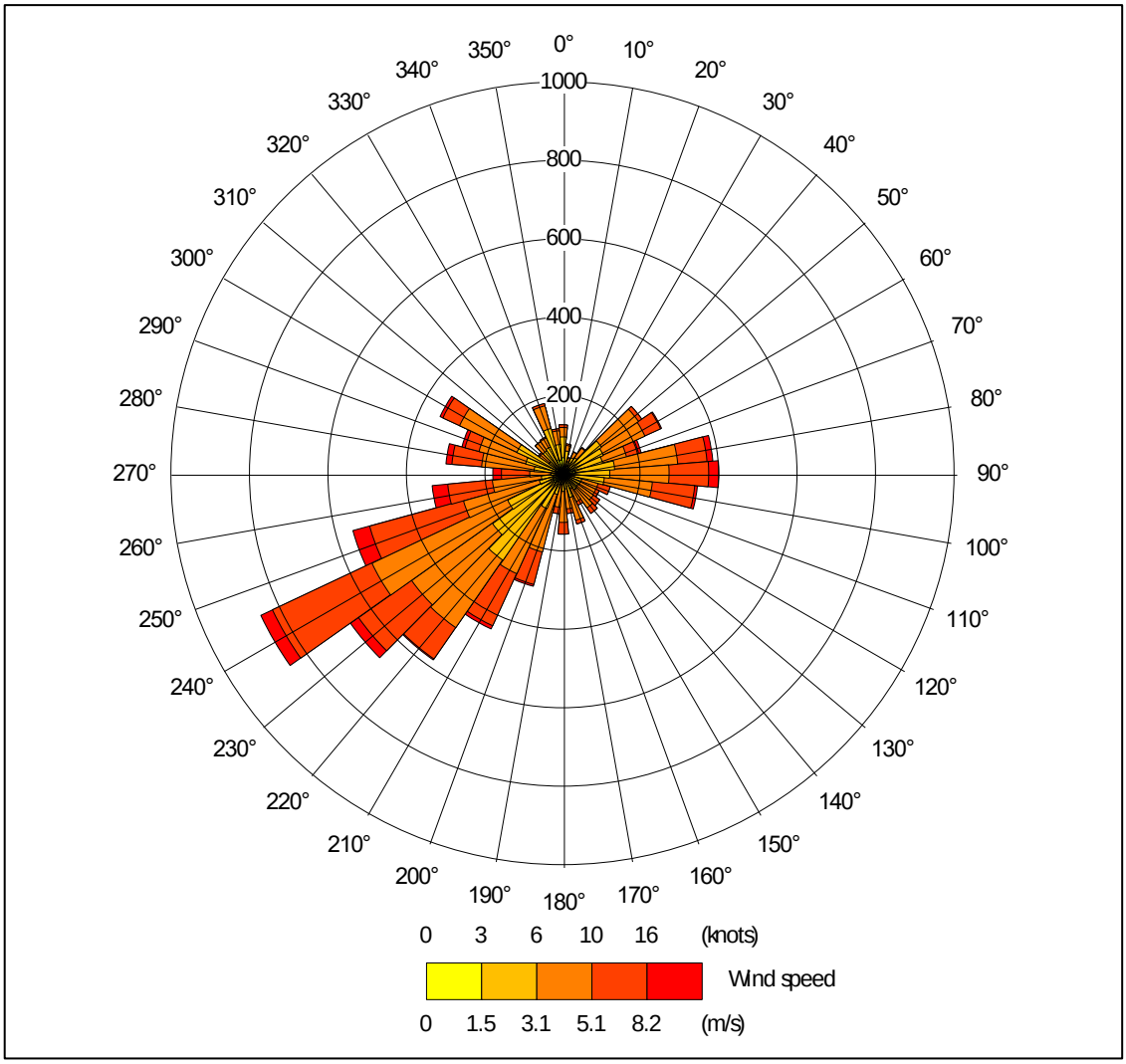


Figure 2 London City Airport 2022 Met Data Windrose

APPENDIX A - REPORT LIMITATIONS

This Report is presented to Medical Team Limited and may not be used or relied on by any other person or by the client in relation to any other matters not covered specifically by the scope of this report.

Notwithstanding anything to the contrary contained in the report, NoiseAir Limited is obliged to exercise reasonable skill, care and diligence in the performance of the services required by Medical Team Limited and NoiseAir shall not be liable except to the extent that it has failed to exercise reasonable skill, care and diligence, and this report shall be read and construed accordingly.

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The conclusions and recommendations contained in this report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from who it has been requested and that such information is accurate. Information obtained by NoiseAir Limited has not been independently verified by NoiseAir Limited unless otherwise stated in the report and should be treated accordingly.

Where assessments of works or costs identified in this report are made, such assessments are based upon the information available at the time and where appropriate are subject to further investigations or information which may become available.

Where / if estimates and projects are made within this report, are made based on reasonable assumptions as of the date of this report, such statements however by their very nature involve risks and uncertainties that could cause actual results to differ materially from the results predicted. NoiseAir Limited specifically does not guarantee or warrant any estimates or projects contained in this report.

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APPENDIX B - GLOSSARY

AADT Annual Average Daily Traffic	A daily total traffic flow (24hrs), expressed as mean daily floor across all 365 days of the year.
Adjustment	Application of a correction factor to modelled results to account for uncertainties in the model.
Accuracy	A measure of how well a set of data fits the true value.
Air quality objective	Policy target generally expressed as a maximum ambient concentration to be achieved, either without exception or with the permitted number of exceedances within a specific time scale (see also air quality standard).
Ambient air	Outdoor air in the troposphere, excluding workplace air.
Annual mean	the average (mean) of the concentrations measured for each pollutant for one year.
AQMA	Air Quality Management Area.
AQO	Air Quality Objective.
AURN	Automatic Urban And Rural (air quality) Network, managed by contractors on behalf of Defra.
Conservative	Trending to over predict the impact rather than under predict.
Data Capture	The percentage of all the possible measurements forgiven periods that were validly measured.
Defra	Department for Environment, Food and Rural Affairs.
DfT	Department for Transport
EFT	Emission Factor Toolkit
Emission rate	The quantity of a pollutant released from a source over a given period of time.
EPUK	Environmental Protection (UK)
Exceedance	A period of time where the concentration of a pollutant is greater than the appropriate air quality standard.

HDV/HGV	Heavy Duty Vehicle/Heavy Goods Vehicle.
IAQM	Institute of Air Quality Management.
LAQM	Local Air Quality Management.
Model adjustment	Following model verification, the process by which modelled results are amended. This corrects for systematic error.
NO_2	Nitrogen dioxide.
NO_X	Nitrogen oxides.
PM_{10}	Particulate matter with an aerodynamic diameter of less than 10 micrometres.
Road link	A length of road which is considered to have the same flow of traffic along it. Usually, a link is the road from one junction to the next
$\mu g/m^3$ micrograms per cubic metre	A measure of concentration in terms of mass per unit volume. A concentration of $1\mu g/m^3$ means that one cubic metre of air contains one microgram (millionth of a gram) of a pollutant.

APPENDIX C – LONDON SPG CONSTRUCTION DUST ASSESSMENT METHODOLOG

LONDON SPG CONSTRUCTION DUST ASSESSMENT METHODOLOGY

Step 1 – Screening the Need for a Detailed Assessment

An assessment will normally be required where there are:

- 'human receptors' within 50m of the site boundary; all 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)

For specific (high risk) schemes the planning authority may require dust assessment despite the proposed site falling outside the distances above.

Where the need for more detail assessment is screened out, it can be concluded that the level of risk is 'negligible', and any effects will not be significant.

Step 2a – Define the Potential Dust Emission Magnitude

The dust emission magnitude is based on the scale of the anticipated works and should be classified as Small, Medium, or Large. The following are examples of how the potential dust emission magnitude for different activities can be defined.

Note that, in each case, not all criteria need to be met; other criteria may be used if justified within the assessment. Where relevant, multiple screening assessments may be completed for different development phases (or even sub-phases where demolition may be brief or there is a very short period of intense activity, for example).

Table C1: Construction Dust - Magnitude of Emission

Magnitude	Activity	Criteria
Large	Demolition	- Total volume of building to be demolished greater than 50,000 m^3. - Potentially dusty material (e.g., concrete). - On-site crushing and screening. - Demolition activities more than 20 m about ground level.
	Earthworks	- Total site area greater than 10,000 m^2. - Potentially dusty soil type (e.g., clay, which will be prone to suspension when dry due to small particle size). - More than 10 heavy earth moving vehicles active at any one time.

Table C1: Construction Dust - Magnitude of Emission		
Magnitude	**Activity**	**Criteria**
		- Formation of bunds greater than 8 m in height. - More than 100,000 tonnes of material moved.
	Construction	- Total building volume greater than 100,000 m^3. - On site concrete batching. - Sandblasting.
	Trackout	- More than 50 Heavy Duty Vehicle (HDV) trips per day. - Potentially dusty surface material (e.g., high clay content). - Unpaved road length greater than 100 m.
Medium	Demolition	- Total volume of building to be demolished between 20,000 m^3 and 50,000 m^3. - Potentially dusty construction material. - Demolition activities 10 m to 20 m above ground level.
	Earthworks	- Total site area 2,500 m^2 to 10,000 m^2. - Moderately dusty soil type (e.g., silt). - to 10 heavy earth moving vehicles active at any one time. - Formation of bunds 4 m to 8 m in height. - Total material moved 20,000 tonnes to 100,000 tonnes.
	Construction	- Total building volume 25,000 m^3 to 100,000 m^3. - Potentially dusty construction material (e.g., concrete). - On site concrete batching.
	Trackout	- 10 to 50 HDV trips per day. - Moderately dusty surface material (e.g., high clay content). - Unpaved road length 50 m to 100 m.
Small	Demolition	- Total volume of building to be demolished less than 20,000 m^3. - Construction material with low potential for dust release (e.g., metal cladding or timber). - Demolition activities less than 10 m above ground and during wetter months.
	Earthworks	- Total site area less than 2,500 m^2. - Soil type with large grain size (e.g., sand). - Less than 5 heavy earth moving vehicles active at any one time. - Formation of bunds less than 4 m in height. - Total material moved less than 20,000 tonnes.

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Table C1: Construction Dust - Magnitude of Emission		
Magnitude	**Activity**	**Criteria**
		- Earthworks during wetter months.
	Construction	- Total building volume less than 25,000 m^3. - Construction material with low potential for dust release (e.g., metal cladding or timber).
	Trackout	- Less than 10 HDV trips per day. - Surface material with low potential for dust release. - Unpaved road length less than 50 m.

Step 2b – Define the Sensitivity of the Area

The tables below present the SPG assessment methodology to determine the sensitivity of the area to soiling, human health and ecological impacts respectively. The SPG guidance provides guidance to allow sensitivity of individual receptors 2 to soiling and health effects to assist in the assessment of the overall sensitivity of the study area.

Table C2: Sensitivity of the Area to Dust Soiling Effects					
Receptor Sensitivity	**Number of Receptors**	**Distance from the Source (m)**			
		<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 C3: Sensitivity of the Area to Human Health Impacts							
Receptor Sensitivity	**Annual Mean PM_{10} Concentrations ($\mu g/m^3$)**	**Number of Receptors**	**Distance from the Source (m)**				
			<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

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Table C3: Sensitivity of the Area to Human Health Impacts							
Receptor Sensitivity	Annual Mean PM_{10} Concentrations ($\mu g/m^3$)	Number of Receptors	Distance from the Source (m)				
			<20	<50	<100	<200	<350
		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Medium	-	>10	High	Medium	Low	Low	Low
	-	1-10	Medium	Low	Low	Low	Low
Low	-	1-10	Low	Low	Low	Low	Low

Table C4: Sensitivity of the Area to Ecological Impacts		
Receptor Sensitivity	Distance from the Source (m)	
	<20	<50
High	High	Medium
Medium	Medium	Low
Low	Low	Low

Step 2c – Define the Risk of Impacts

The dust emissions magnitude determined in 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 C5: Risk of Dust Impacts			
Sensitivity of Surrounding	Dust Emission Magnitude		
	Large	Medium	Small
Demolition			
High	High Risk	Medium Risk	Medium Risk
Medium	High Risk	Medium Risk	Low Risk
Low	Medium Risk	Low Risk	Negligible
Earthworks and Construction			
High	High Risk	Medium Risk	Medium Risk
Medium	High Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible
Trackout			
High	High Risk	Medium Risk	Low Risk
Medium	High Risk	Low Risk	Negligible
Low	Low Risk	Low Risk	Negligible

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 law, medium or high risk Site. The SPG guidance details the mitigation measures required for low, medium and high risk sites as determined in Step 2C.

Step 4 – Determine Significant Effects

Once the risk of dust impacts has been determined in Step 2C under 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 I'm there for the residual effects will normally be negligible.

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ACOUSTICS & AIR QUALITY

335 Euston Road
Construction noise assessment

08 August 2024

Report For:

Reza Hajhosseiny

Report reference

30137_CNA1

TIMBRAL

Timbral Ltd., registered at 88 North Street, Hornchurch, RM11 1SR

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Reference	Date	Comments	Issued by
30137_CNA1	8 August 2024	First issue	Tony Trup, BMus, MSc, MIOA

1.0 Introduction

As part of a proposed redevelopment of 335 Euston Road into a medical clinic, the client proposes to install outdoor air conditioning condensers.

Timbral have been instructed to undertake an environmental noise survey, assess the noise emissions of the proposed installation in accordance with the Local Authority's requirements, and make recommendations, where required, to bring the units into compliance.

This report presents our findings.

2.0 Site description

2.1 Site location and context

The site is located at 335 Euston Road, London, NW1 3AD, within the administrative boundaries of the London Borough of Camden. The site is bounded to the north by Euston Road, and to the south, east and west by mixed use premises.

Euston road is a major thoroughfare through central London, with significant levels of road traffic. Residential premises are located at first floor and above of the neighbouring buildings.

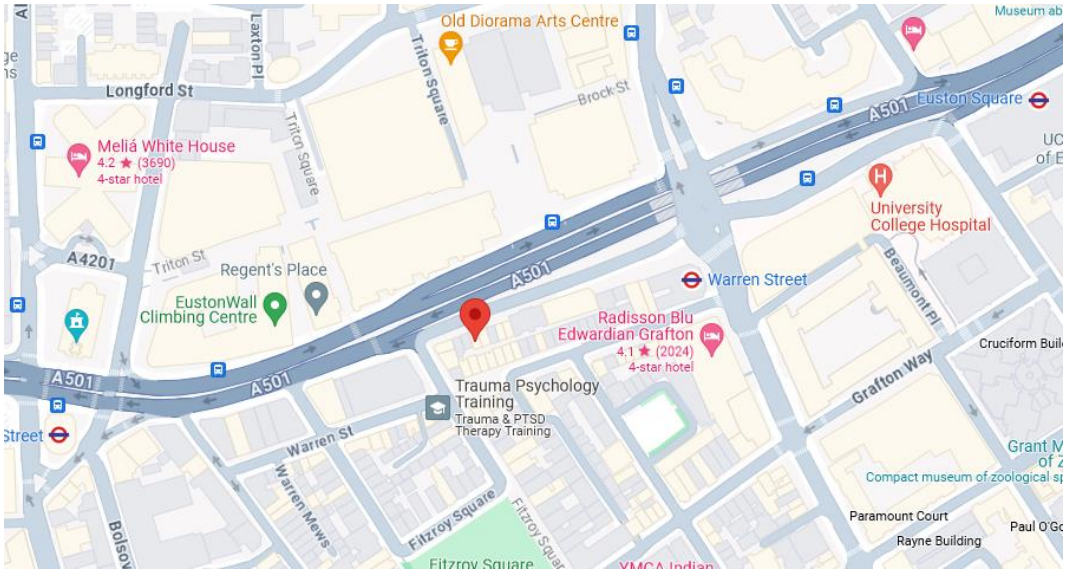


Figure 1 Site context (maps.google.co.uk)

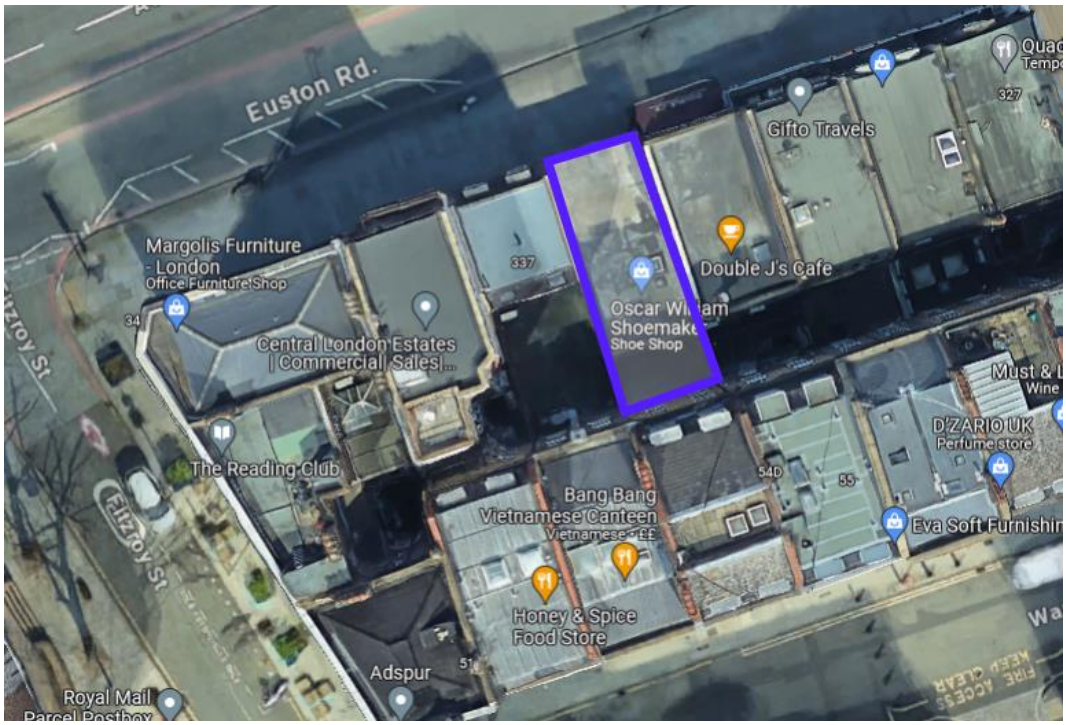


Figure 2 Satellite image (Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group, Maps)

2.2 Proposals

The site is currently a single storey ground floor retail unit.

The client proposes to demolish the existing unit and build a new medical centre comprising basement, ground and two additional floors.



Figure 3 Proposed elevation

3.0 Background noise survey

An unattended survey was undertaken between Tuesday 23 April and Friday 26 April 2024. The full methodology and results are summarized in our Noise Impact Assessment report 30137_NIA2_revA dated 8 August 2024.

A summary of the survey results is presented below, for weekday construction site hours (08:00 to 18:00). A time history is presented in Appendix D.

Table 1 As-measured summary results, sound pressure levels, dB(A), weekday construction hours only (08:00 to 18:00)

Date	$L_{Aeq,10hr}$	Modal $L_{A90,60min}$
Tuesday 23 April	64	60, 62
Wednesday 24 April	64	61
Thursday 25 April	64	61

Measurements were made at the rear site boundary at first floor roof level. These levels are presented as measured (i.e. including reflections). The microphone was approximately one metre away from two walls, and 1.5 metres from the first floor roof. A -9 dB correction should be applied to estimate free-field values.

The dominant source of noise at the site is road traffic on Euston Road, and building services plant serving neighbouring commercial premises.

4.0 Noise-sensitive receptors

A description of the nearest noise-sensitive receptors is presented in Table 2, with locations marked on Figure 4.

Ref	Description
NSR1	Residential receptors at the first floor of 333 Euston Road, with facades at the front and rear.
NSR2	Residential receptors at the first floor of 337 Euston Road, with facades at the front and rear. Rear windows partially overlook the site.
NSR3	Residential receptors at the rear of properties on Warren Street, and at the rear of 339 Euston Road, with windows overlooking the site.

Table 2 Noise sensitive receptors



Figure 4 Noise sensitive receptors (satellite image)

The nearest commercial receptors are:

- 333 Euston Road (Double J's Café and Bistro)

- 337 Euston Road and 59 Warren Street (Bang Bang Vietnamese Canteen)
- 55 Warren Street (Eva Soft Furnishings)
- 57 Warren Street (Must and Lees Wine Merchant)

These commercial receptors are not particularly sensitive to noise and vibration, but they will be included in all community liaison efforts.

5.0 Noise and vibration management

5.1 Operational hours

The working hours for the development site (including any demolition and construction activity) and deliveries including the transport of materials, plant and equipment to the development site, shall only take place during the following hours:

- Monday to Friday 08:00 to 18:00 hours.
- No working on weekends
- No working on Public Holidays

5.2 Best Practicable Means (BPM)

Section 72 of the Control of Pollution Act 1974 (and Section 79(9) of the Environmental Protection Act 1990) define Best Practicable Means (BPM) as follows:

- “Practicable” means reasonably practicable having regard among other things to local conditions and circumstances, to the current state of technical knowledge and to the financial implications.
- The means to be employed include the design, installation, maintenance and manner and periods of operation of plant and machinery, and the design, construction and maintenance of buildings and acoustic structures.
- The test of best practicable means is to apply only so far as compatible with any duty imposed by law, and in particular is to apply to statutory undertakers only so far as compatible with the duties imposed on them in their capacity of statutory undertakers.
- The test is to apply only so far as compatible with safety and safe working conditions, and with the exigencies of any emergency or unforeseeable circumstances.

The Control of Pollution Act 1974 (CoPA) states that in determining whether BPM has been employed, regard should be given to any relevant Code of Practice approved under Section 71 of CoPA.

BS 5228:2009 + A1:2014 has been approved as a Code of Practice by the Secretary of State under Section 71 of CoPA.

5.3 BPM in practice

In implementing BPM, the following will be undertaken:

- The quietest and newest vehicles/plant machinery shall be used at all times. All vehicles and mechanical plant used for the purpose of the works shall be fitted with effective exhaust silencers (where available), shall be maintained in good and efficient working order and operated in such a manger as to minimize noise emissions.
- All plant, machinery and vehicles in intermittent use shall be shut down in the intervening periods between works.
- Site operatives and visitors will be encouraged to avoid unnecessary revving of engines, and to turn off equipment and vehicles when not required.
- Static plant and machinery shall be sited as far away as possible from the Noise Sensitive Receptors.
- Use rubber linings in dump and haul trucks.
- All compressors shall be 'noise reduced' models that are fitted with properly lined and sealed acoustic covers which shall be kept closed whenever the machines are in use. All ancillary pneumatic percussion tools shall be fitted with mufflers or silencers of the type recommended by the manufacturers.
- Wherever possible, mains electricity or battery powered equipment shall be used instead of diesel or petrol powered generators.
- The handling of materials shall be conducted in such a manner that minimizes noise, including minimizing drop heights into hoppers and lorries.
- No stereos or similar amplified devices shall be audible beyond the site boundary (except fire and burglar alarms or other health and safety warnings).
- Stat up plant and vehicles sequentially rather than all together.
- Audible reversing warning systems on mobile plant and vehicles should be of a type which, whilst ensuring that they give proper warning, have a minimum noise impact on persons outside sites.
- Wherever practicable, materials being lowered will not be dropped, and the surfaces on to which the materials are being moved will be covered by resilient material (e.g. rubber matting).

5.4 Community relations

It is well established that people's attitudes to noise and vibration can be influenced by their attitudes to the source or activity itself. Noise and vibration from a site will tend to be accepted more readily by local residents, if they consider that the contractor is taking all possible measures to avoid unnecessary noise and vibration.

A Community Liaison Representative will be designated by the Main Contractor prior to commencement on site. This will likely be the Site Manager or their deputy.

Prior to commencement on site, relations will be established with the nearest noise-sensitive receptors (as described in 4.0). The purpose and benefits of the development will be explained, and noise-sensitive receptors will be assured that Best Practicable Means are being employed to reduce noise and vibration as far as reasonably practicable. The noise-sensitive receptors will be provided with contact details for the Community Liaison Representative, in order to raise any concerns or complaints.

The responsibilities of the Community Liaison Representative will be responsible for:

- Establishing relations with the nearest residential and commercial receptors (see 4.0) prior to commencement on site, to explain the aims of the project and provide contact details for complaints or concerns,
- Informing the noise-sensitive receptors of progress of the site,
- Recording noise and vibration complaints received,
- Treating complaints fairly and expeditiously,
- Investigating the cause of complaints and arranging mitigation where practicable,
- Reporting the actions taken back to the complainant.

5.5 Site operative training and induction

The site manager will provide a full site induction to all site operatives (including employees, contractors and subcontractors), in accordance with the relevant Health and Safety legislation. All site operatives will be informed of the obligation to reduce noise and vibration levels as far as reasonably practicable. All site operatives will be informed of best practicable means and the requirements of the CEMP.

All operatives will be advised regularly of the following:

- The proper use and maintenance of tools and equipment,
- The positioning of machinery on site to reduce the emission of noise to the neighbourhood and to site personnel,
- The avoidance of unnecessary noise when carrying out manual operations and when operating plant and equipment,
- The protection of persons against noise,
- The operation of sound measuring equipment (selected personnel).

Special attention will be given to the use and maintenance of sound-reduction equipment fitted to power tools and machines.

Managers and supervisors will ensure operatives make proper use of equipment so that noise emission will be minimized.

5.6 Control of Noise and Vibration at Work Regulations 2005

Noise at Work Regulations (NAW) and Vibration at Work Regulations (VAW) protect workers from exposure to excessive levels of noise and vibration at work. The implementation of NAW and VAW is beyond the scope of the CEMP, however, measures taken to reduce noise and vibration levels at source in accordance with the Regulations, will also result in reduced noise and vibration levels at noise-sensitive receptors.

The Site Manager will ensure the requirements of the NAW and VAR are implemented by all site operatives, in addition to the CEMP. All site operatives will be advised of the their rights and responsibilities under the VAW and NAW, as part of their site induction.

5.7 Signage

Signage is to be placed on the inside and outside of hoarding, and inside welfare facilities, reminding site operatives to be considerate to the residents and keep noise to a minimum.

5.8 Complaint management

In the event of a noise complaint, the Community Liaison Representative, will investigate the cause of the complaint at the earliest opportunity.

In the event a noise complaint is reported to the Community Liaison Representative, contact information will be requested including: name, address, telephone number, email address. In addition to contact information, a summary of the complaint will be required. Anonymous complaints will not be accepted. All complaints in respect to noise should be recorded in a dedicated folder for sequential audit and review using the Form in Appendix B. The Community Liaison Representative should be made aware of all noise complaints made to other site operatives, and investigate the cause of the complaint.

The Community Liaison Representative will acknowledge the noise complaint within one working day by contacting the complaint either by phone or email, explaining that the complaint has been logged and an investigation is being undertaken. Following the investigation, the Public Liaison Representative will provide a response to the complainant within three working days with appropriate resolutions where possible.

Following a noise complaint, the Noise Management Plan will be reviewed with emphasis to enhance measures to reduce the potential for a further complaint. Information from complaints should be made available to London Borough of Camden Environmental Health Officers for review upon request.

6.0 Predicted noise levels

6.1 Schedule of works and equipment

A project programme is presented in Figure 9.

A schedule of equipment for each week and percentage on-times is presented in Figure 10.

Predicted noise levels, including mitigation, are presented in Figure 11.

6.2 Basis of predictions

Noise levels at the nearest receptors have been predicted using the A-weighted noise level provided for various equipment types in Appendix C of BS 5228:2009.

Our calculations assume that, on average, the noise-producing equipment will be located close to the centre of site (approximately 10 metres from receptors), with at least one reflecting surface nearby (in addition to the ground).

Our calculations include mitigation by way of an acoustic shed, and self-screening during roofing works.

6.3 Assumed mitigation

Demolition will be undertaken using backhoe-mounted pulverisers (munchers) instead of breakers.

Cutting and breaking using handheld tools will be undertaken in an acoustic shed, wherever practicable. See 6.3.1 for details of the shed. The recommended shed type is expected to provide approximately 10 dB attenuation, as per guidance in BS 5228.

As the superstructure rises, self-screening will provide some screening, and we have assumed a -5 dB reduction during the roofing and cladding stages for this reason.

6.3.1 Acoustic shed

Once the building structure has been demolished, there will be no screening between the open site and noise-sensitive receptors. At this stage, an acoustic shed will be used by operatives using handheld breakers.

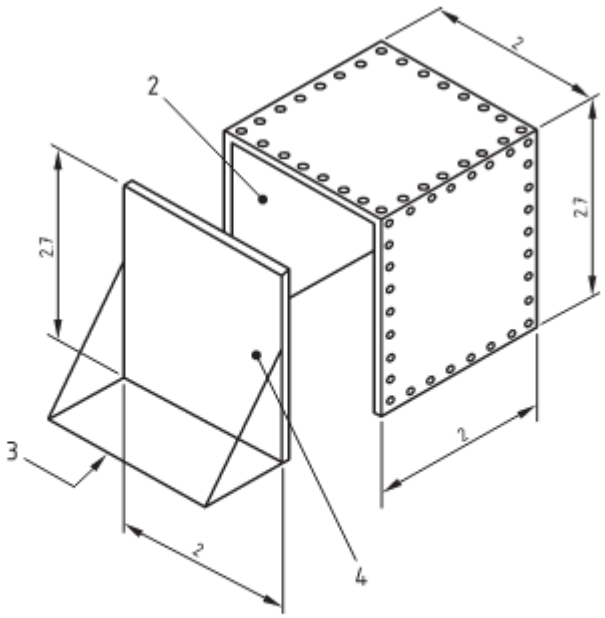
When using the shed, precautions should be taken to protect the operator(s) from any consequential hazard.

The effectiveness of partial noise enclosures and of screens can be reduced if they are used incorrectly, e.g. the noise being enclosed should be directed into and not out of enclosures. There should not be a reflecting surface, such as a parked lorry, or wall, opposite the open side of noise enclosures. The enclosure opening should be facing towards Euston Road, whenever reasonably practicable.

The acoustic shed shall be constructed as follows:

- 9 mm plywood or other solid material weighing about 5 kg/m^2, on simple timber framing, with no gaps at joints or corners.
- 50 mm rockwool on the inside faces, protected by wire mesh.
- Gaps between the sides and ground closed with a flap of tough grade polyethylene sheeting or similar.
- Extractor fan may be required to prevent a build-up of dust.
- Artificial lighting may be necessary.
- The enclosure shall enclose the operator on three sides and on top.
- At the front of the enclosure, a screen to the same specification will be provided (also with rockwool and mesh), positioned up to a meter away from the opening.

The acoustic shed shall conform to that described in BS 5228-1.



b) Open-sided shed with screen

Key

1	9 mm plywood outer covering on wood framework	3	Weighted or tied down
2	Inner lining of 50 mm sound-absorbent material (see **B.3**)	4	9 mm plywood screen

Figure 5 Example of acoustic shed, dimensions in metres (Figure B.3 from BS 5228-1)

6.4 Noise monitoring

In the event of a complaint to the Local Authority, attended noise monitoring will be undertaken to quantify the levels of noise arising from the site, and to investigate opportunities to reduce noise emissions by Best Practicable Means.

Noise measurements will be undertaken by a suitably-qualified acoustician (SQA) at a position representative of the nearest noise-sensitive receptors, using Type 1 Sound Level Meters.

The SQA will inform the Main Contractor of the measured levels, and advise on ways to reduce them, where practicable possible. Where required, the Local Authority will be informed of the measured noise levels and recommendations for mitigation.

7.0 Conclusions

A scheme of demolition and construction is proposed at 335 Euston Road.

Demolition and construction activities and equipment have been proposed to reduce the potential impacts of noise and vibration, in accordance with Best Practicable Means.

Additional mitigation is proposed to some hand tools by way of an acoustic shed, as per guidance in BS 5228.

Predicted levels of noise from construction activities are presented.

Appendix A Glossary

Decibel (dB)

The ratio of sound pressures which we can hear is a ratio of 106:1 (one million:one). For convenience, therefore, a logarithmic measurement scale is used. The resulting parameter is called the 'sound pressure level' (Lp) and the associated measurement unit is the decibel (dB). As the decibel is a logarithmic ratio, the laws of logarithmic addition and subtraction apply.

dB(A)

The unit used to define a weighted sound pressure level, which correlates well with the subjective response to sound. The 'A' weighting follows the frequency response of the human ear, which is less sensitive to low and very high frequencies than it is to those in the range 500Hz to 4kHz.

In some statistical descriptors the 'A' weighting forms part of a subscript, such as LA10, LA90, and LAeq for the 'A' weighted equivalent continuous noise level.

Equivalent continuous sound level, Leq

An index for assessment for overall noise exposure is the equivalent continuous sound level, Leq. This is a notional steady level which would, over a given period of time, deliver the same sound energy as the actual time-varying sound over the same period. Hence fluctuating levels can be described in terms of a single figure level.

Frequency

Frequency is the rate of repetition of a sound wave. The subjective equivalent in music is pitch. The unit of frequency is the hertz (Hz), which is identical to cycles per second. A 1000Hz is often denoted as 1kHz, eg 2kHz = 2000Hz. Human hearing ranges approximately from 20Hz to 20kHz. For design purposes the octave bands between 63Hz to 8kHz are generally used. The most commonly used frequency bands are octave bands, in which the mid frequency of each band is twice that of the band below it. For more detailed analysis, each octave band may be split into three one-third octave bands or in some cases, narrow frequency bands.

Maximum noise level, LAmax

The maximum noise level identified during a measurement period. Experimental data has shown that the human ear does not generally register the full loudness of transient sound events of less than 125ms duration and fast time weighting (F) has an exponential time constant of 125ms which reflects the ear's response. Slow time weighting (S) has an exponential time constant of 1s and is used to allow more accurate estimation of the average sound level on a visual display.

The maximum level measured with fast time weighting is denoted as LAmax, F. The maximum level measured with slow time weighting is denoted LAmax, S.

Structure-borne noise

This is the transmission of noise energy as vibration of building elements. The energy may then be re-radiated as airborne noise. Structureborne noise is controlled by structural discontinuities, i.e. expansion joints and floating floors.

Appendix B Noise complaint form

Name of person filling in form	
Date of complaint	
Time of complaint	
Complaint made by email/phone/text/in person	
Name and address of complainant	
Contact number or email address of complainant	
Nature of complaint	
Investigation undertaken by	
Date of investigation	
Mitigation measures identified	
Future policy changes or recommendations	
Complainant informed of resolution? Note date and method of communication.	
Signed (Community Liaison Representative)	
Signed (Site Manager / Deputy)	

Appendix C Photos



Figure 6 View to NSR2 and NSR3 at the rear



Figure 7 View from the rear of site towards Euston Road

Appendix D Figures

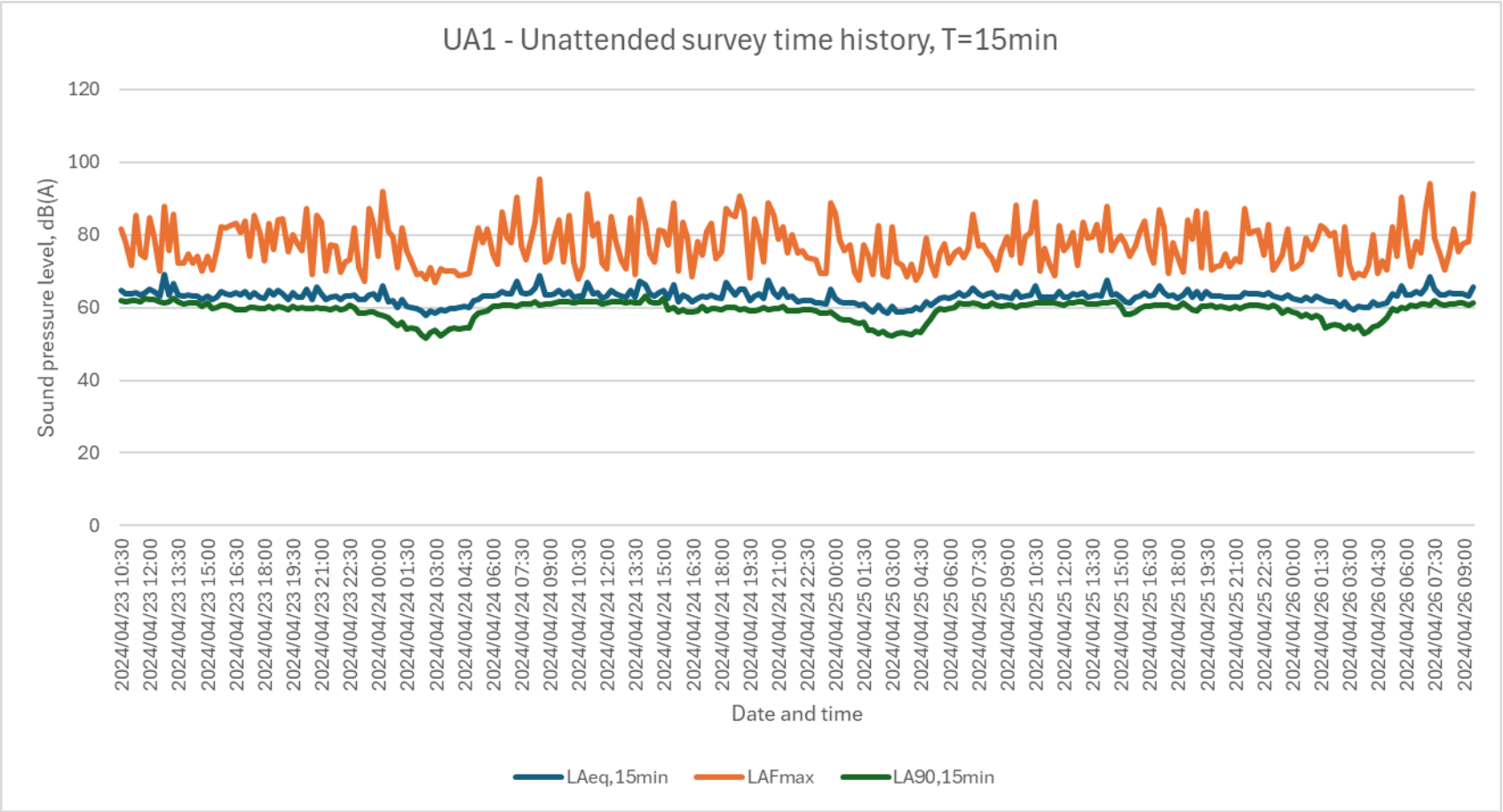


Figure 8 Unattended survey time history

Appendix E Schedules

NO	PHASE	PLANNED START	PLANNED FINISH
1	SITE SETUP	MONTH 1	MONTH 1
2	DEMOLITION	MONTH 1	MONTH 1
3	SUB-STRUCTURE WORKS	MONTH 2	MONTH 3
4	SUPER-STRUCTURE WORKS	MONTH 3	MONTH 5
5	ROOFING & CLADDING WORKS	MONTH 6	MONTH 7
6	INTERNAL FIT OUT	MONTH 8	MONTH 11
7	LANDSCAPING	MONTH 11	MONTH 12
8	HANDOVER	MONTH 12	MONTH 12

Figure 9 Approximate project programme, with noisy works highlighted in pink

Project phase and works	Quantity	Week Number and % on time																												
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29
Demolition																														
Pulverizer on backhoe (29t, 143 kW)	1	10	65	65	65	65																								
Handheld pneumatic breaker	2	25	65	65	65	65																								
Excavator (loading dump truck)	1	15	15	15	15	15																								
Dump truck taking away spoil	1	15	15	15	15	15																								
Clearing site																														
Dozer (142 kW)	1						75	75																						
Wheeled backhoe loader	1						75	75																						
Dump truck taking away spoil	1						15	15																						
Substructure																														
Mini piling rig (29 kW 5.4t auger 10 m deep x 450 mm diameter piles	1								65	65	65	65	65																	
Diesel Generator	1								20	20	20	20	20																	
Concrete mixer and pump (26t capacity)	1								50	50	50	50	50																	
Superstructure																														
Scaffold	1													25	5	5	25	5	5	25	5	5								
Diesel Generator	1													75	75	75	75	75	75	75	75	75								
Concrete mixer and pump (26t capacity)	1													50	50	50	50	50	50	50	50	50								
Hand-held hammer	1													10	10	10	10	10	10	10	10	10								
Handheld circular saw (cutting concrete blocks)	1													40	40	40	40	40	40	40	40	40								
Roofing and cladding																														
Angle grinder	1																						35	35	35	35	25	25	20	20
Hand-held hammer	1																						10	10	10	10	10	10	10	10
Scaffold	1																						10	10	10	10	10	10	10	10

Figure 10 Assumed equipment schedule and percentage on times during noisy works

Project phase and works	Quantity	SPL, dB(A) at 10m	Attenuation	Reflections	SEL, dB(A) @ 10m with attenuation	Week Number and % on time 1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29
Demolition																																		
Pulverizer on backhoe (29t, 143 kW)	1	72	0	3	75	65	73	73	73	73																								
Handheld pneumatic breaker	2	83	-10	3	76	66	74	74	74	74																								
Excavator (loading dump truck)	1	85	-5	3	83	73	75	75	75	75																								
Dump truck taking away spoil	1	80	0	3	83	73	75	75	75	75																								
Clearing site																																		
Dozer (142 kW)	1	75	0	3	78						77	77																						
Wheeled backhoe loader	1	68	0	3	71						70	70																						
Excavator (loading dump truck)	1	85	-5	3	83						78	78																						
Dump truck taking away spoil	1	80	0	3	83						70	70																						
Substructure																																		
Mini piling rig (29 kW 5.4t auger 10 m deep x 450 mm diameter piles	1	76	0	3	79								77	77	77	77	77																	
Diesel Generator	1	65	0	3	68								61	61	61	61	61																	
Concrete mixer and pump (26t capacity)	1	75	0	3	78								75	75	75	75	75																	
Superstructure																																		
Scaffold	1	80	0	3	83													77	70	70	70	70	70	70	70	70								
Diesel Generator	1	65	0	3	68													67	67	67	67	67	67	67	67	67								
Concrete mixer and pump (26t capacity)	1	75	0	3	78													75	75	75	75	75	75	75	75	75								
Hand-held hammer	1	84	0	3	87													74	74	74	74	74	74	74	74	74								
Handheld circular saw (cutting concrete blocks)	1	79	-10	3	72													67	67	67	67	67	67	67	67	67								
Roofing and cladding																																		
Angle grinder	1	80	-5	3	78																						72	72	72	72	72	72	71	71
Hand-held hammer	1	84	-5	3	82																						72	72	72	72	72	72	72	72
Scaffold	1	78	-5	3	76																						66	66	66	66	66	66	66	66
Weekly LAeq,10hr during working hours						**77**	**80**	**80**	**80**	**80**	**81**	**81**	**79**	**79**	**79**	**79**	**79**	**81**	**79**	**79**	**79**	**79**	**79**	**79**	**79**	**79**	**76**	**76**	**76**	**76**	**76**	**76**	**75**	**75**

Figure 11 Predicted noise levels, sound pressure level at 10 metres (approximate distance from centre of site to receptors)

335 Euston Road
Noise impact assessment

08 August 2024

Report For:

Reza Hajhosseiny

Report reference

30137_NIA2_RevA

TIMBRAL

Timbral Ltd., registered at 88 North Street, Hornchurch, RM11 1SR

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Reference	Date	Comments	Issued by
30137_NIA1	21 May 2024	First issue	Tony Trup BMus MSc MIOA MAES
30137_NIA2	17 July 2024	Revision to proposed plant.	Tony Trup BMus MSc MIOA MAES
30137_NIA2_RevA	8 August 2024	Revision to proposed plant.	Tony Trup BMus MSc MIOA MAES

1.0 Introduction

As part of a proposed redevelopment of 335 Euston Road into a medical clinic, the client proposes to install an air source heat pump.

Timbral have been instructed to undertake an environmental noise survey, assess the noise emissions of the proposed installation in accordance with the Local Authority's requirements, and make recommendations, where required, to bring the units into compliance.

This report presents our findings.

2.0 Site description

2.1 Site location and context

The site is located at 335 Euston Road, London, NW1 3AD, within the administrative boundaries of the London Borough of Camden. The site is bounded to the north by Euston Road, and to the south, east and west by mixed use premises.

Euston road is a major thoroughfare through central London, with significant levels of road traffic. Residential premises are located at first floor and above of the neighbouring buildings.

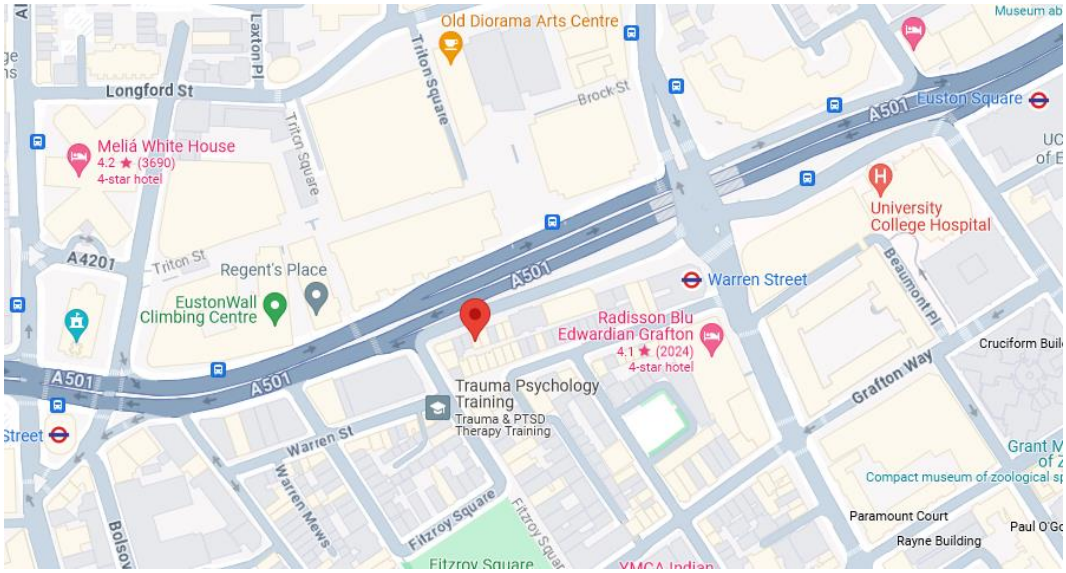


Figure 1 Site context (maps.google.co.uk)

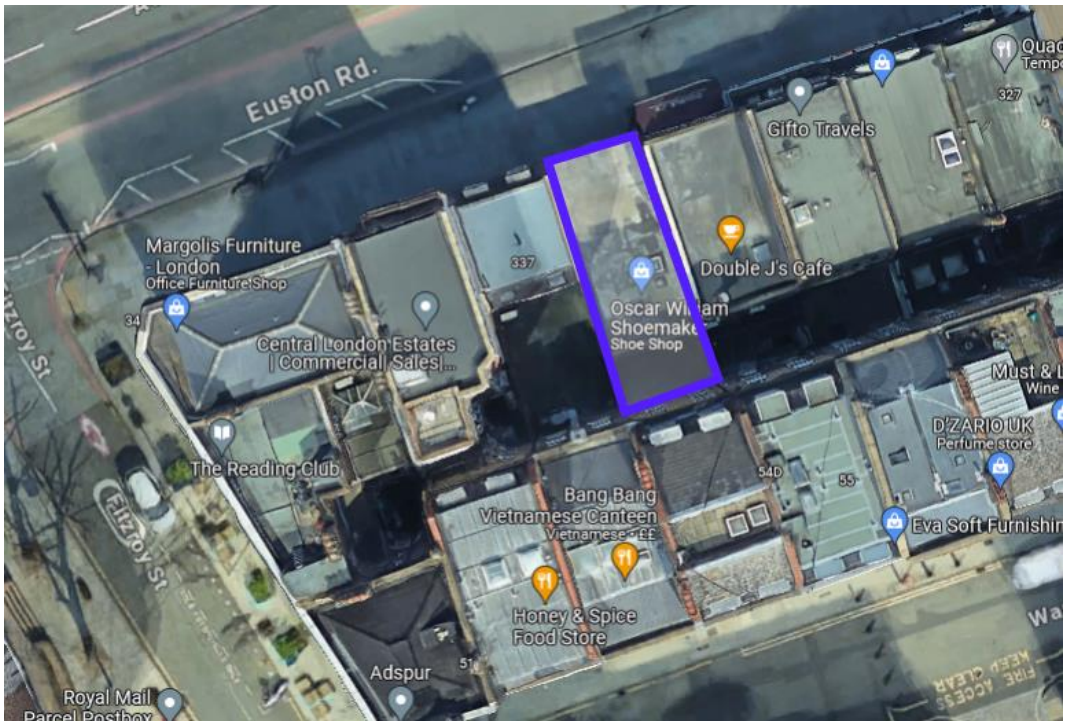


Figure 2 Satellite image (Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group, Maps)

2.2 Proposals

The site is currently a single storey ground floor retail unit.

The client proposes to demolish the existing unit and build a new medical centre comprising basement, ground and two additional floors.



Figure 3 Proposed elevation

3.0 Criteria, policy and guidance

A summary of relevant national planning policy and industry guidance is presented in Appendix B.

3.1 Local policy and guidance

Chapter 6 of the *Camden Planning Guidance – Amenity (January 2021)* describes the Local Authority's policies regarding noise and vibration, and provides guidance for assessments to be submitted with planning applications.

Relevant to this application, paragraphs 6.27 and 6.29 state,

"6.27 Developments proposing plant, ventilation, air extraction or conditioning equipment and flues will need to provide the system's technical specifications to the council accompanying any acoustic report. 'BS4142 Method for rating Industrial and Commercial Sound' contains guidance and standards which should also be considered within the acoustic report.

...

6.29 Plant, ventilation, air extraction or conditioning equipment and flues can cause disturbance to residential properties. The Council would therefore welcome the use of long-term maintenance agreements to ensure that equipment maintains acceptable noise levels over its lifetime and the use of timers to limit any unnecessary operation of the equipment."

3.2 Summary criteria

On the basis of the Local Authority's policy, and previous experience with similar applications in the London Borough of Camden, we would suggest that the cumulative noise emissions of proposed mechanical plant (including any penalties for acoustic characteristics) do not exceed a level of -10 dB below the representative background sound level, for the relevant period of operation.

In summary, the proposed criteria are:

$L_{Ar,Tr(plant)} = L_{A90,T} - 10$ dB

Where:

$L_{Ar,Tr}$ is the cumulative rating level of the plant noise (including acoustic character penalties);

$L_{A90,T}$ is the representative background sound level, and;

T is 60 minutes during the day, and 15 minutes at night.

This criterion is subject to approval by the Local Authority.

4.0 Survey methodology

4.1 Overview

An unattended survey was undertaken from approximately 10:30 on Tuesday 23 April to 09:30 on Friday 26 April 2024.

Sound pressure level measurements were undertaken using Class 1 sound level meters, in general accordance with *BS7445 Description and measurement of environmental noise*.

Measurements were undertaken of the L_{Aeq}, L_{AFmax} and L_{A90} indices (along with 1/1 octave-band data) in 1-minute intervals, and the data has been processed to compute longer periods, where required for assessment or as recommended by industry guidance.

4.2 Personnel

The survey and impact assessment were undertaken by Tony Trup, BMus, MSc, MIOA, MAES. Tony has over a decade of experience in acoustics consultancy, having previously worked at national and multidisciplinary firms. Tony has been responsible for the acoustics on luxury residential and office tower developments, and was also previously the acoustics project manager for a nationally-significant infrastructure project.

4.3 Measurement positions

Measurements were undertaken at one position, at first floor level towards the rear of site. The microphone was placed on a tripod approximately 1.5 metres from the flat roof, with two additional reflecting walls. This location was chosen for security purposes as it was shielded from line of sight from most of the surrounding windows (which open out onto the flat roof),

and from street level. The position is thought to be representative of the soundscape at neighboruing residential windows, as they all overlook the same area of flat roof, which spans across the site, and partially over neighbouring demises. See photos in Appendix D, which also show the plant serving other nearby buildings. The condenser unit closest to the microphone was not operating at the time of our site visits.



Figure 4 Measurement positions

4.4 Equipment

The following equipment was used in the survey.

Table 1 Survey equipment

Item	Make and model	Serial No.	Laboratory calibration due
Type 1 Sound Level Meter	Norsonic Nor-140	1402823	August 2024
Field calibrator	Norsonic Nor-1251	32120	February 2025

The microphone was fitted with a windshield and attached to a data logger by an extension cable.

The sound level meter was calibrated prior to, and upon completion of the survey. No significant drift was found to have occurred.

4.5 Weather

According to timeanddate.com, the ambient temperature ranged from 2 to 12 degrees Celsius over the course of the survey, with no rainfall.

During set-up and take-down of the unattended survey, the sky was overcast and roads were dry.

4.6 Subjective impressions

Subjectively, the dominant sources of noise at the rear of site were road traffic from Euston Road, and mechanical plant serving adjacent buildings. Multiple air conditioning condensers and some kitchen extract fans were noted to be serving neighbouring premises. See photos in Appendix D.

4.7 Results

A time history graph is presented in Appendix E.

A summary of the survey results is presented below. We have only presented data for the working-hour Daytime period (taken as 07:00 to 19:00), as no operation is proposed during evening or night-time periods.

Table 2 As-measured summary results, sound pressure levels, dB(A), working-hour daytime only (07:00 to 19:00)

Date	$L_{Aeq,12hr}$	Modal $L_{A90,60min}$
Tuesday 23 April	64	60, 62
Wednesday 24 April	64	61
Thursday 25 April	64	61

These levels are presented as measured (i.e. including reflections). The microphone was approximately one metre away from two walls, and 1.5 metres from the first floor roof. A -9 dB correction should be applied to estimate free-field values.

5.0 Assessment

5.1 Proposed installation

The client proposes to install one Daikin Altherma 3 M – EBLA09-14D3W1 air source heat pump at the rear of site, at first floor level. The manufacturer's sound pressure level data is presented in Table 3.

Table 3 Sound pressure levels of proposed plant, dB at octave band centre frequencies, Hz, at 1m in a semi-anechoic chamber (1 reflecting surface)

63	125	250	500	1k	2k	4k	8k	dB(A)
72	63	59	50	41	37	33	27	54

The measurements are understood to have been taken at one metre from the units on a hemispherical surface, in an outdoor environment (i.e. without significant reflections from other surfaces).

5.2 Nearest sensitive receptor

The nearest noise-sensitive receptors are the windows of residential units at first floor and above at 333 and 337 Euston Road, as well as to the rear on Warren Street. All the sensitive windows overlook the first floor roof, which will effectively become a shared lightwell once the proposed redevelopment of 335 takes place.

5.3 Background sound level

Some plant noise from other installations (notably the fan and condensers serving the neighbouring premises) was present in the background sound. BS 4142:2014 discusses the treatment of background plant noise as follows, *"Since the intention is to determine a background sound level in the absence of the specific sound that is under consideration, it is necessary to understand that the background sound level can in some circumstances legitimately include industrial and/or commercial sounds that are present as separate to the specific sound."*

BS 4142:2014 also states, *"In practice, there is no 'single' background sound level as this is a fluctuating parameter. However, the background sound level used for the assessment should be representative of the period being assessed."*

It should be recognised that the existing building is single storey, and the receptors at the rear of site therefore are exposed to noise from Euston Road. Once the proposed building is erected to second floor level, the line of sight will be obscured, and ambient and background sound levels will reduce somewhat. However, noise from plant serving neighbouring buildings will still continue to contribute to the soundscape at the rear of site, and are thought to partially control the existing levels of ambient and background sound. We suggest that criteria are proposed on the basis of the existing noise levels, given that these are partially determined by existing plant serving other premises, and also recognizing that, in doing so, noise-sensitive receptors would be exposed to noise levels no worse than existing, perhaps with a slight reduction in overall noise exposure.

On the basis of our measurements, we propose a background sound level of 61 dB(A) (52 dB(A) free-field) to be used during the daytime (dB $L_{A90,60min}$, from 07:00 to 19:00 hours). **No evening or night-time operation is proposed.** Therefore, the Local Authority requirement would be that the cumulative rating level of the proposed installation, $L_{Ar,Tr}$, does not exceed 42 dB(A) (free-field) at the nearest noise-sensitive receptors.

This background sound level and proposed criterion are subject to approval by the Local Authority.

5.4 Acoustic feature corrections

The manufacturer's data does not indicate any likely tonality or other acoustic features.

In our experience, air source heat pumps can produce a slight low frequency tonal hum, depending on the model and its duty. We therefore apply a +2 dB acoustic feature correction in the course of our assessment.

5.5 Uncertainty

In our experience, the noise of HVAC plant can vary by ±5 dB versus the design calculations, due to installation, balancing, calculation uncertainty and manufacturing variations. The suggested Local Authority criterion of -10 dB below background sound level includes for a suitable buffer, such that, if the noise levels are 5 dB higher than predicted (as in the potential worst-case), then the sound level at the nearest receptor would still be substantially below the background sound level and have a negligible impact.

5.6 Mitigation measures

An initial calculation of noise impact indicated that, without mitigation measures, the noise impact from the proposed installation exceeds the requirements of the Local Authority.

We therefore recommend that an acoustic enclosure providing at least 10 dB(A) of attenuation is provided to the proposed air source heat pump. See attached specification for acoustic enclosures in Appendix C. The enclosure should include suitable anti-vibration measures to mitigate risk of vibration transfer into adjacent structures. Acoustic enclosures can be heavy, and the additional mass should be taken into account in the structural design of the project.

The air source heat pump (in its enclosure), must be located a minimum of four metres away from neighbouring residential windows, and with only two reflecting surfaces within 3 metres.

5.7 Calculated impact

A calculation of sound propagation from the proposed ASHP is presented in Figure 5.

Predicted noise emissions of EBLA14D3W1 ASHP

Item / Description	Rating/Broadband/Input Rating	dB	dB(A)	Octave Band Centre Frequency, Hz 31.5	63	125	250	500	1k	2k	4k	8k
SPL at 1m (A-weighted spectrum)					46.0	47.0	50.0	47.0	41.0	38.0	34.0	26.0
A-Weighting Curve				-39.4	-26.2	-16.1	-8.6	-3.2	0.0	1.2	1.0	-1.1
SPL at 1m (Z-weighted spectrum), with 1 reflecting surface			54.2 (A)		72.2	63.1	58.6	50.2	41.0	36.8	33.0	27.1
Ratio of Distances - Point Source	1.0 m	4.0 m		-12.0	-12.0	-12.0	-12.0	-12.0	-12.0	-12.0	-12.0	-12.0
Additional reflections (2 more sufaces)					6.0	6.0	6.0	6.0	6.0	6.0	6.0	6.0
Enclosure					-10.0	-10.0	-10.0	-10.0	-10.0	-10.0	-10.0	-10.0
			38.1 (A)		56.2	47.1	42.6	34.2	25.0	20.8	17.0	11.1

Figure 5 Predicted noise emissions

An assessment in accordance with BS 4142:2014 and the Local Authority requirements is presented in Table 4.

Table 4 Noise impact assessment in accordance with BS 4142:2014, dB sound levels

	dB sound level of proposed installation, with mitigation implemented
Specific sound level L_{As}	38
Acoustic feature corrections	+2
Rating level L_{Ar}	40
Background sound level	52
Exceedance over background sound level	-12
Local Authority requirement	42
Exceedance over Local Authority requirement	-2
Compliance with Local Authority requirement	PASS

6.0 Conclusions

A new medical centre is proposed at 335 Euston Road. One air source heat pump is proposed to serve the building.

A background noise level survey has been undertaken, and noise emission criteria proposed in accordance with Local Authority requirements and industry guidance.

We **recommend** the air source heat pump is provided with enclosures providing at least 10 dB(A) attenuation (see attached specification). Attention must be paid to the recommendations on distances and reflecting surfaces in 5.6.

Our assessment finds that, with the recommended mitigation measures, the proposed air source heat pump should be capable of achieving the Local Authority's requirements.

Appendix A Glossary

Decibel (dB)

The ratio of sound pressures which we can hear is a ratio of 106:1 (one million:one). For convenience, therefore, a logarithmic measurement scale is used. The resulting parameter is called the 'sound pressure level' (Lp) and the associated measurement unit is the decibel (dB). As the decibel is a logarithmic ratio, the laws of logarithmic addition and subtraction apply.

dB(A)

The unit used to define a weighted sound pressure level, which correlates well with the subjective response to sound. The 'A' weighting follows the frequency response of the human ear, which is less sensitive to low and very high frequencies than it is to those in the range 500Hz to 4kHz.

In some statistical descriptors the 'A' weighting forms part of a subscript, such as LA10, LA90, and LAeq for the 'A' weighted equivalent continuous noise level.

Equivalent continuous sound level, Leq

An index for assessment for overall noise exposure is the equivalent continuous sound level, Leq. This is a notional steady level which would, over a given period of time, deliver the same sound energy as the actual time-varying sound over the same period. Hence fluctuating levels can be described in terms of a single figure level.

Lden

Day-evening-night noise level, the A-weighted, Leq (equivalent noise level) over a whole day, but with a penalty of 10 dB(A) for night-time noise (23:00-07:00) and 5 dB(A) for evening noise (19:00-23:00), also known as the day evening night noise indicator

Lnight

The A-weighted, Leq (equivalent noise level) over the 8 hour night period of 23:00 to 07:00 hours, also known as the night noise indicator.

Frequency

Frequency is the rate of repetition of a sound wave. The subjective equivalent in music is pitch. The unit of frequency is the hertz (Hz), which is identical to cycles per second. A 1000Hz is often denoted as 1kHz, eg 2kHz = 2000Hz. Human hearing ranges approximately from 20Hz to 20kHz. For design purposes the octave bands between 63Hz to 8kHz are generally used. The most commonly used frequency bands are octave bands, in which the mid frequency of each band is twice that of the band below it. For more detailed analysis, each octave band may be split into three one-third octave bands or in some cases, narrow frequency bands.

Maximum noise level, LAmax

The maximum noise level identified during a measurement period. Experimental data has shown that the human ear does not generally register the full loudness of transient sound events of less than 125ms duration and fast time weighting (F) has an exponential time constant of 125ms which reflects the ear's response. Slow time weighting (S) has an exponential time constant of 1s and is used to allow more accurate estimation of the average sound level on a visual display.

The maximum level measured with fast time weighting is denoted as LAmax, F. The maximum level measured with slow time weighting is denoted LAmax, S.

Structure-borne noise

This is the transmission of noise energy as vibration of building elements. The energy may then be re-radiated as airborne noise. Structureborne noise is controlled by structural discontinuities, i.e. expansion joints and floating floors.

Appendix B Policy and guidance

Policy and Guidance

National policy and guidance

National Planning Policy Framework

The National Planning Policy Framework 2023 (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced. The NPPF must be taken into account in preparing the local development plans and is a material consideration in planning decisions.

The excerpts of the NPPF relevant to the proposed development are as follows:

"174. 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... noise pollution."

"185. 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. In doing so they should:

a) Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life ..."

Planning Practice Guidance (Noise) (PPG(N))

The PPG(N) is published by the Ministry of Housing, Communities & Local Government and aims to provide guidance on the implementation of government policy in planning and noise.

In summary, it states that noise can override other planning concerns where justified, although the context of the wider characteristics of the development, its likely users and surroundings all can have an effect on whether noise is likely to pose a concern. It emphasizes that good acoustic design needs to be considered early in the planning process to ensure that the most appropriate and cost-effective solutions are identified from the outset.

The PPG(N) also includes a Noise Exposure Hierarchy Table which, in summary, emphasizes that increasing noise levels have adverse effects on behaviour, attitude, physiology, sleep and quality of life. The PPG(N) does not contain objective targets for noise levels and thus further guidance and studies should be referred to, in order to quantify appropriate targets.

Noise Policy Statement for England

The Government's policy on noise is set out in the Noise Policy Statement for England. Its vision is to:

"Promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development."

Its aims are to:

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimize adverse impacts on health and quality of life; and
- where possible, contribute to the improvement of health and quality of life.

The NPSE provides the policy framework to assist the implementation of the Environmental Noise Directive and the Environmental Noise (England) Regulations 2006 ('the Regulations'). Whilst the NPSE is not legislation and local authorities are not legally bound by it, it is expected that local authorities will take it into account in relevant situations.

The NPSE encourages relevant stakeholders, including Local Planning Authorities (LPAs), to review and revise existing policies and practices so that *"the policies and any noise management measures being adopted accord with the vision, aims and principles of the NPSE"*.

Industry guidance

BS 4142:2014

British Standard BS 4142[2014] + A1(2019) *Method for rating and assessing industrial and commercial sound* is widely used by local authorities to determine whether a new industrial noise source is likely to give rise to complaint from people living nearby.

BS 4142[2014] + A1(2019) sets out a method to assess the likely effect of sound from factories, industrial premises or fixed installations and sources of an industrial nature in commercial premises, on people who might be inside or outside a dwelling or premises used for residential purposes in the vicinity.

The procedure contained in BS 4142[2014] + A1(2019) for assessing the effect of sound on residential receptors is to compare the measured or predicted sound level from the source in question, the $L_{Aeq,Tr}$ 'specific sound level', immediately outside the dwelling with the LA90,T background sound level.

Where the sound contains a tonality, impulsivity, intermittency and other attention-catching acoustic characteristics, then a penalty depending on the grade of the aforementioned characteristics of the sound is added to the specific sound level to obtain the $L_{Ar,Tr}$ 'rating sound level'. A correction to include the consideration of a level of uncertainty in sound measurements, data and calculations can also be applied when necessary.

BS 4142[2014] + A1(2019) states: "The significance of sound of an industrial and/or commercial nature depends upon both the margin by which the rating level of the specific sound source exceeds the background sound level and the context in which the sound

occurs". An estimation of the impact of the specific sound can be obtained by the difference of the rating sound level and the background sound level and considering the following:

- "Typically, the greater this difference, the greater the magnitude of the impact."
- "A difference of around +10dB or more is likely to be an indication of a significant adverse impact, depending on the context."
- "A difference of around +5dB is likely to be an indication of an adverse impact, depending on the context."
- "The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or a significant adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a negligible impact, depending on the context."
- During the daytime, the assessment is carried out over a reference time-period of 1-hour, and 15-minutes during the night-time. The periods associated with day and night, for the purposes of the assessment, are 07.00 to 23.00 and 23.00 to 07.00, respectively.

The initial estimate of the impact may need to be modified due to the context of the assessment. Section 11 of BS 4142[2014] + A1(2019) states that where background sound levels and rating levels are low, absolute levels might be more relevant than the margin by which the rating level exceeds the background.

Appendix C Specification for acoustic enclosures

The acoustic enclosure must provide the attenuation of sound pressure levels described in this report, as a minimum.

The acoustic enclosure shall be designed and constructed so as not to add additional pressure drop to the system, to provide the required ventilation and to avoid overheating. The mechanical plant supplier shall be consulted for acceptability of the enclosure from mechanical, overheating and fire risk perspectives.

Suitable anti-vibration mounts shall be incorporated, and the enclosure fabric shall be suitably damped such that it does not resonate, buzz or re-radiate noise or vibration.

The implementation of the enclosure shall not result in attention-grabbing acoustic characteristics (e.g. tonality, impulsivity, percussive sounds), as would be considered for penalties under the regime described in BS 4142:2014.

Suitable suppliers of acoustic enclosures could include Environ, IAC or Caice.

Appendix D Photos



Photo 1 Measurement position UA1



Photo 2 Plant serving neighbouring buildings (1)



Photo 3 Plant serving neighbouring buildings (2)

Appendix E Figures

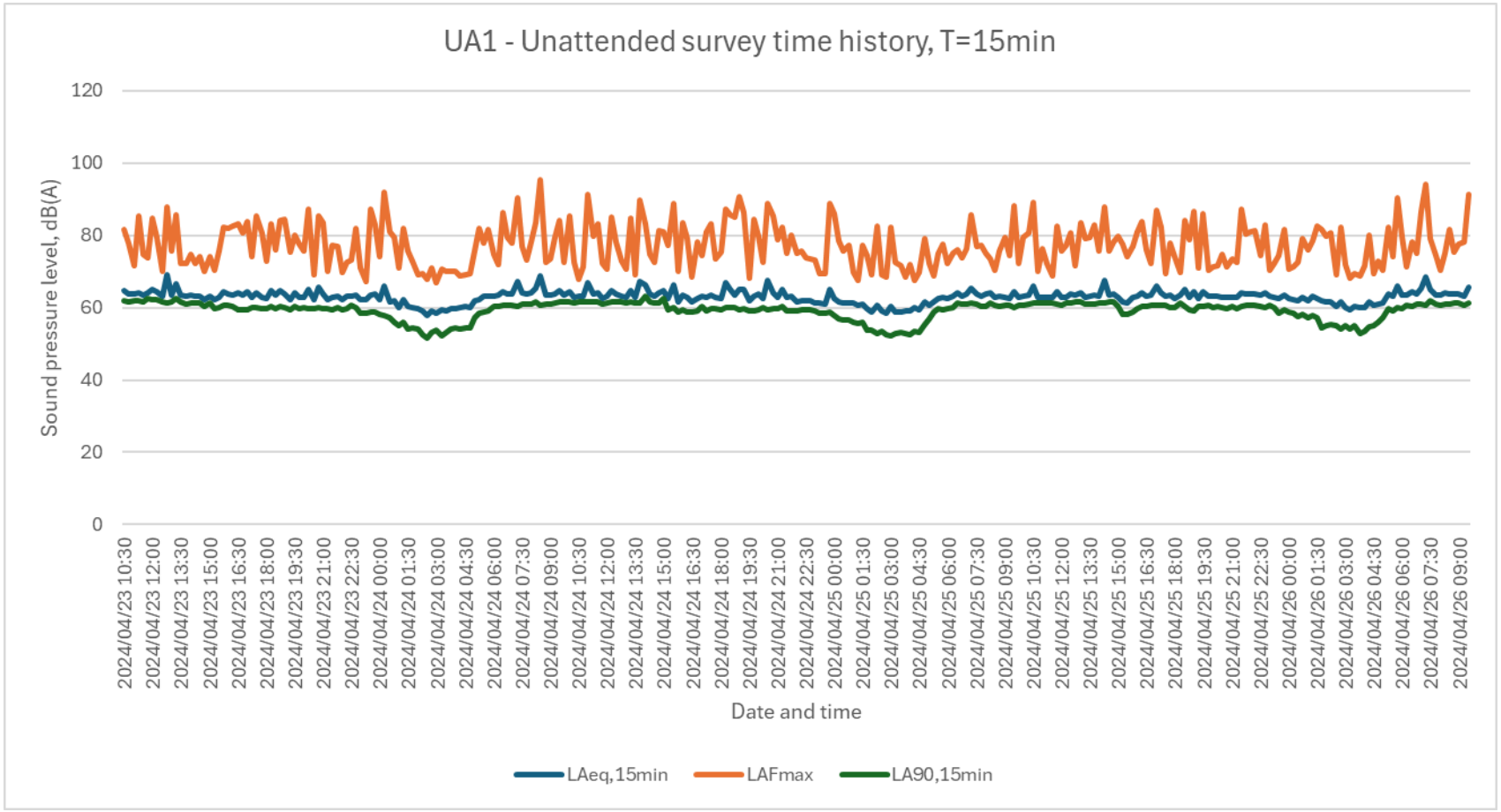


Figure 6 Unattended survey time history