



Dust and Air Quality Innovation and Expertise

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Technical Note – Construction Dust Monitoring Plan - Planning Application - 2022/4259/P

Site Address: 100 & 88 Gray's Inn Road and 127 Clerkenwell Road London WC1X 8AL

Introduction and Context

This technical note presents the finalised construction dust monitoring plan for the proposed development. The London Borough of Camden were consulted on a draft plan, and requested changes which resulted in this final plan.

A Construction Dust Risk Assessment has been carried out and presented in the Air Quality Assessment (GEM Air Quality Ltd, September 2022), submitted as part of the planning application.

The largest risk associated with dust soiling was considered to be 'Medium' during the demolition and construction phases. With respect to human health impacts, the largest risk classified was 'Medium' during the construction phase.

In response to this, the local planning authority, the London Borough of Camden has advised the project managers for the proposed development of the following draft planning conditions:

'prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors etc etc' and

'prior to commencement, evidence has been submitted demonstrating that the monitors have been in place for at least 3 months prior to the proposed implementation date.'

Guidance

The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance¹ (SPG) (2014) for London states that:

"All demolition and construction sites should be monitored for the generation of air pollution."

Best practice monitoring methods for local authorities are outlined in Appendix 8 of the SPG. Not all best practice methods outlined will be applicable to all sites in the dust and emission risk categories.

Based on the risk categories established as part of the Construction Dust Risk Assessment, the proposed development is classed as a 'Medium Risk Site'. The SPG states that monitoring methods on Medium Risk Sites are as follows:

"Low Risk Sites

- *Take into account the impact of air quality and dust on occupational exposure standards to minimise worker exposure and breaches of air quality objectives that may occur outside the site boundary, such as by visual assessment; and*

¹ Greater London Authority. (2014) 'The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance'

- *Keep an accurate log of complaints from the public, and the measures taken to address any complaints, where they were required;*

Medium Risk Sites

- *As for low risk sites;*
- *Determine the prevailing wind direction across the site using data from a nearby weather station²*
- *If measuring air quality along a line;*
 - *Set up a line across the site according to the direction of the prevailing wind; and*
 - *Operate a minimum of two automatic particulate monitors to measure PM10 levels at either end of the line - either inside or outside the site boundary. These instruments should provide data that can be downloaded in real-time by the local authority; and*
- *If monitoring air quality at sensitive receptors:*
 - *Identify which location(s) need to be monitored and set up an automatic particulate monitor at each of these to measure representative PM10 levels. These instruments should provide data that can be downloaded in real-time by the local authority;*
 - *If required, supplement monitoring with hand held monitors to get on-the-spot readings at selected points, such as close to sensitive receptors; and*
 - *Consider also monitoring dust deposition and soiling rates as these can be used to indicate nuisance.”*

The Camden Planning Guidance Air Quality³ (2021) states that medium risk schemes usually require at least two real-time monitors with the considerations made to the following when determining monitoring placements:

- Identified near receptors
- Prevailing atmospheric conditions
- Off-site emission sources
- Local topography
- Relevant dust-generating site activities

Proposed Monitoring Locations

DustScanAQ therefore proposes that two monitors are used at the following monitoring locations, as shown in Figure 1, subject to a site visit and power availability.

² Permanent weather stations are only operated at few locations in and around London. Ideally a minimum of 12 months data should be used.

³ London Borough of Camden. (2021) 'Camden Planning Guidance Air Quality'



Figure 1: Proposed Monitoring Locations for the Proposed Development

The buildings in the areas shown hatched in the figure (red for 100 Grays Inn Road and green for 127 Clerkenwell Road) are proposed to be demolished. The top floor of the building outlined in blue (88 Grays Inn Road) is also scheduled for removal and rebuilding. The rationale for selecting the locations is that they will be best practicable in the pathway between the source of the dust and the nearest residential receptors.

Consultation with the Camden Air Quality Officer, Ben Spode, on 18/04/2023 confirmed the suitability of the two monitoring locations, with one representing nearby receptors to the south and one positioned along Clerkenwell Road to the north.

The purpose of the three months' monitoring prior to commencement is to establish a baseline for setting alert thresholds. DustScanAQ have been carrying out PM10 monitoring at nearby 294-295 High Holborn since April 2021 and will use this data to inform interpretation of construction phase monitoring and any actions required to be taken to avoid exceedances, if the baseline period is requested to be shortened to allow works to proceed on site.

Monitors – Indicative MCERTS

The PM10 monitors used will be certified to Indicative MCERTS and will be Turnkey Osiris instruments (or equivalent), as recommended by the 'Control of Dust and Emissions during Construction and Demolition' SPD.

Reporting

Monthly reports will be prepared for submission to LBC