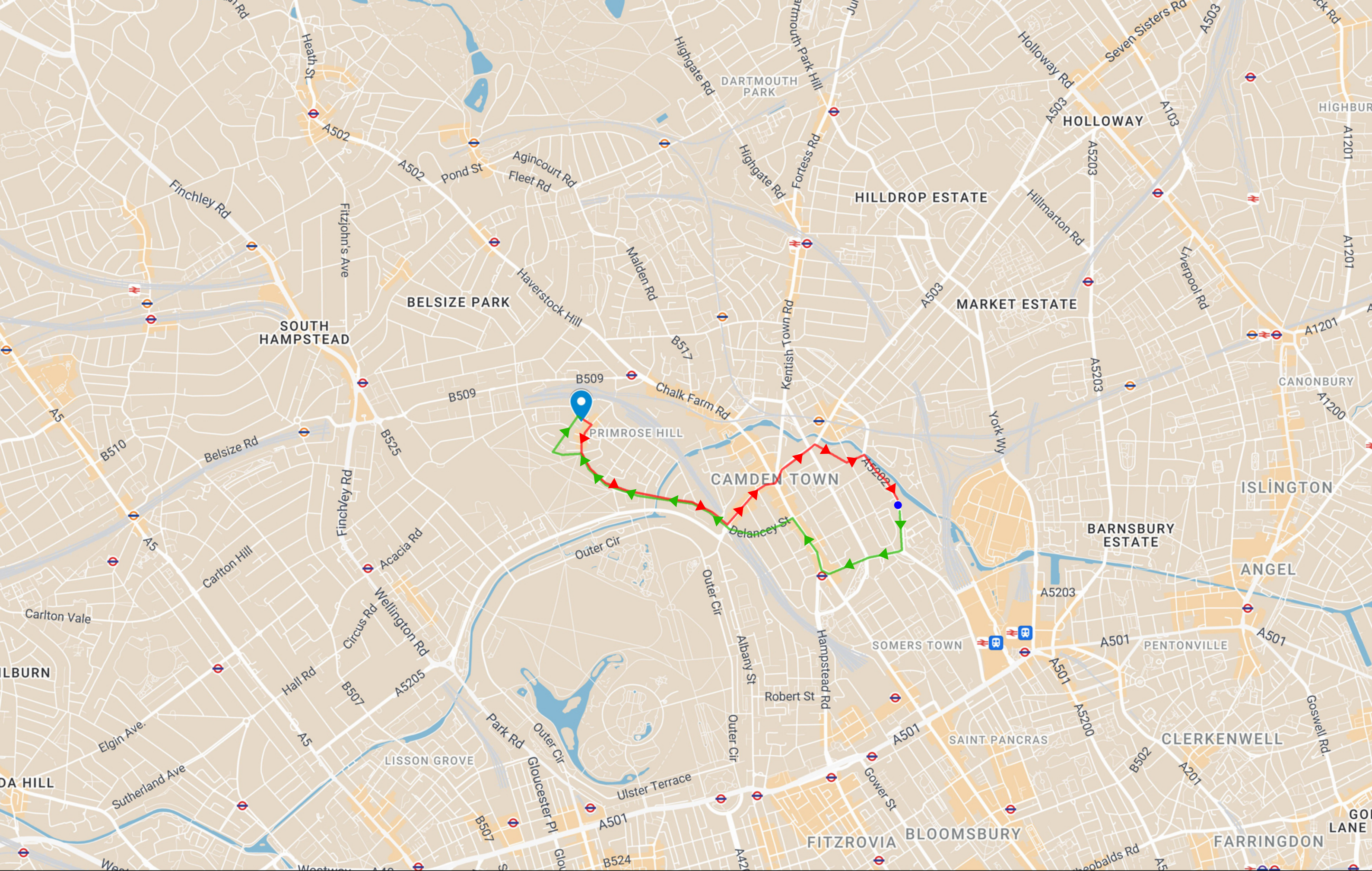


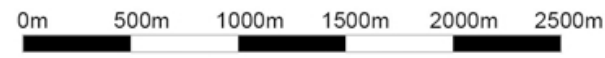
**CMP APPENDICES FOR 1,2,3**  
**ERSKINE MEWS**

## **Appendix A: Vehicle Routes**





**REGIONAL PLAN 1:17.000**  
Scale 1:17.000 on A3 Paper



Map Key:



Site



National Rail Station



TfL Underground Station



TfL Overground Station



Nearest proposed supplier



Ingress Route



Egress Route

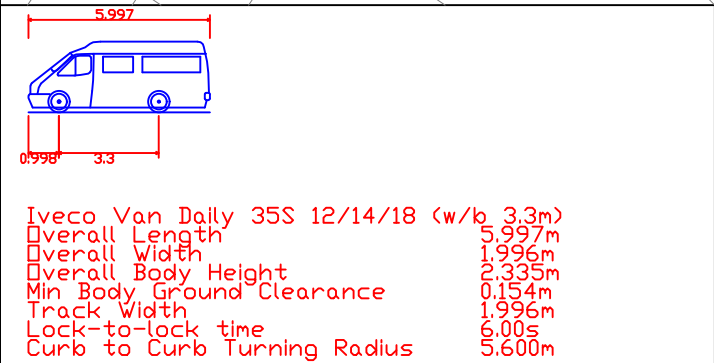
Data Source : Google Maps



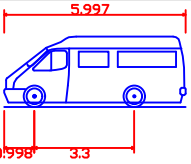
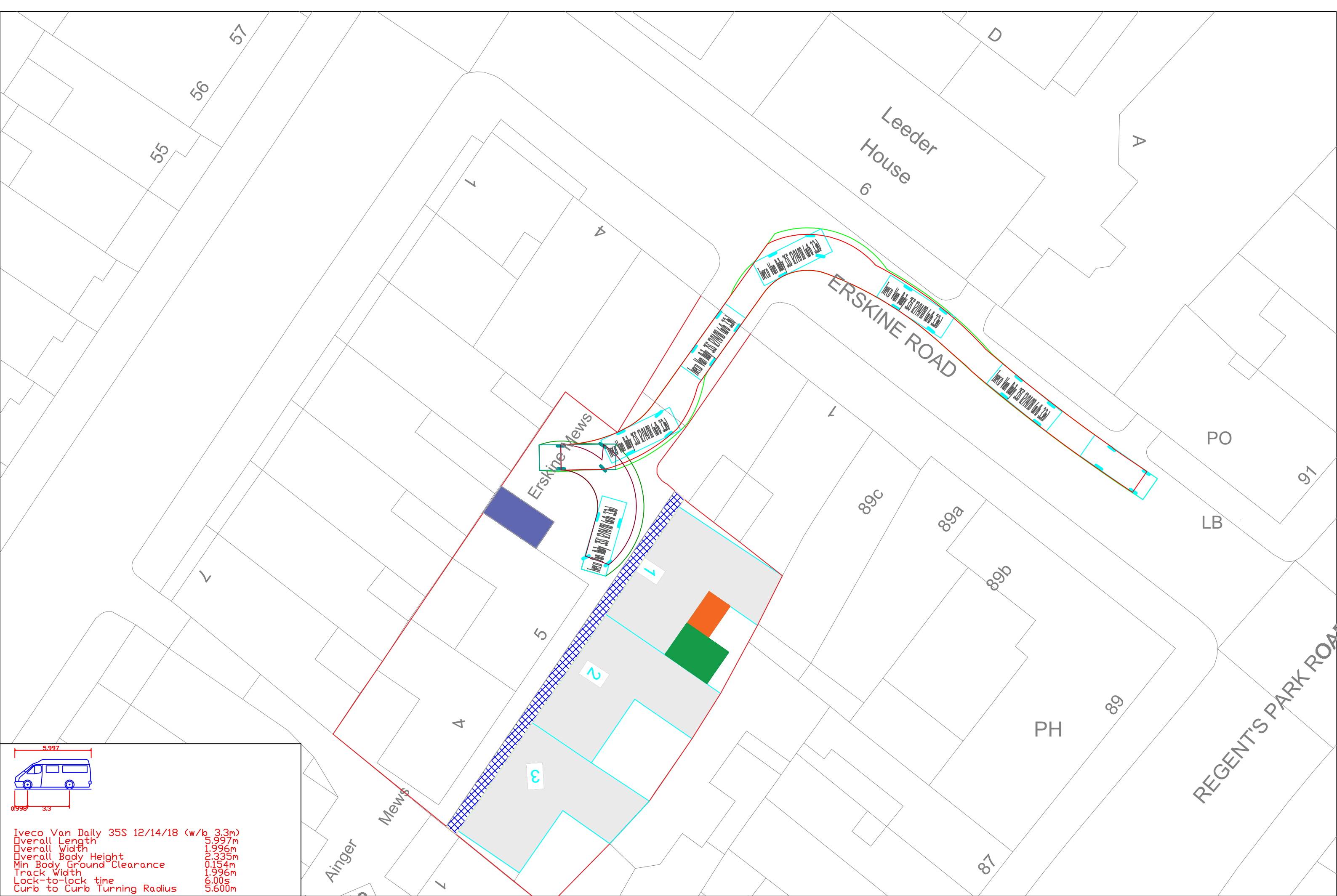
**LIONGATE**  
CONSTRUCTION



## **Appendix B: SPA Drawings**



**LIONGATE**  
CONSTRUCTION



Iveco Van Daily 35S 12/14/18 (w/b 3.3m)  
Overall Length 5.997m  
Overall Width 1.996m  
Overall Body Height 2.335m  
Min Body Ground Clearance 0.154m  
Track Width 1.996m  
Lock-to-lock time 6.00s  
Curb to Curb Turning Radius 5.600m

DELIVERY VEHICLE EGRESS



Scale 1:250 on A3



## **Appendix C: Site Arrangement**



**LEGEND**

- Welfare Facilities
- Material Storage
- Scaffold
- Loading & Unloading Area
- Parking Space for No.4

**SITE ARRANGEMENT**



Scale 1:250 on A3





## **Appendix D: Mental Health Awareness**



**CPD Online College**

ALWAYS LEARNING

Certificate of achievement

# Mental Health First-Aider

This certificate is awarded to

**Thomas Salomone**

Awarded on the 9th September 2024

Expires 9th September 2026

Certificate number 181814-231066

This certificate is worth 3 CPD points

**David Lee**

On behalf of the CPD Online College



## **Appendix E: Noise Awareness**





**CPD Online College**

ALWAYS LEARNING

Certificate of achievement

# Noise Awareness

This certificate is awarded to

**Vitalijs Barbulats**

Awarded on the 19th September 2024

Expires 19th September 2026

Certificate number 182281-47023

This certificate is worth 3 CPD points

**David Lee**

On behalf of the CPD Online College





**CPD Online College**  
ALWAYS LEARNING

Certificate of achievement

# Noise Awareness

This certificate is awarded to

**Haralds Ravics**

Awarded on the 14th September 2024

Expires 14th September 2026

Certificate number 182277-47023

This certificate is worth 3 CPD points

**David Lee**

On behalf of the CPD Online College





**CPD Online College**

ALWAYS LEARNING

Certificate of achievement

# Noise Awareness

This certificate is awarded to

**Helder Chavinha**

Awarded on the 12th September 2024

Expires 12th September 2026

Certificate number 182274-47023

This certificate is worth 3 CPD points

**David Lee**

On behalf of the CPD Online College







**CPD Online College**

ALWAYS LEARNING

Certificate of achievement

# Noise Awareness

This certificate is awarded to

**Ramona Kaniava**

Awarded on the 13th September 2024

Expires 13th September 2026

Certificate number 182280-47023

This certificate is worth 3 CPD points

**David Lee**

On behalf of the CPD Online College





**CPD Online College**  
ALWAYS LEARNING

Certificate of achievement

# Noise Awareness

This certificate is awarded to

**Sergejs Lasmanis**

Awarded on the 16th September 2024

Expires 16th September 2026

Certificate number 182279-47023

This certificate is worth 3 CPD points

**David Lee**

On behalf of the CPD Online College





**CPD Online College**

ALWAYS LEARNING

Certificate of achievement

# Noise Awareness

This certificate is awarded to

**Dimitrjs Vinogradovs**

Awarded on the 12th September 2024

Expires 12th September 2026

Certificate number 182278-47023

This certificate is worth 3 CPD points

**David Lee**

On behalf of the CPD Online College







**CPD Online College**

ALWAYS LEARNING

Certificate of achievement

# Noise Awareness

This certificate is awarded to

**Erez Zenou**

Awarded on the 12th September 2024

Expires 12th September 2026

Certificate number 182275-47023

This certificate is worth 3 CPD points

**David Lee**

On behalf of the CPD Online College





**CPD Online College**  
ALWAYS LEARNING

Certificate of achievement

# Noise Awareness

This certificate is awarded to

**Darjus Kaniava**

Awarded on the 16th September 2024

Expires 16th September 2026

Certificate number 182276-47023

This certificate is worth 3 CPD points

**David Lee**

On behalf of the CPD Online College



## **Appendix F: Community Letter**



## A CONSULTATION

Dear Neighbours,

We, the residents of 4 houses in Erskine Mews, NW3 3AP, have planning permission (2022/2230/P) from Camden Council to add single storey roof extensions to our houses to provide additional living accommodation. We plan to start construction work shortly.

We have a draft **Construction Management Plan** which aims to mitigate as far as possible the impact of the works on neighbouring properties and on the local environment. Such a Plan is a requirement of the Council and also marks the residents' commitment to good neighbourly behaviour and relations.

We will be grateful to receive any suggestions and questions on the draft Plan. It can be seen on the website of the principal contractor EGL Construction – see [www.....](http://www.....) Any responses should be sent to Mr XYZ at EGL Construction .....email... address. Please respond by Tuesday 17<sup>th</sup> September.

For information: All onsite works will be within the walled area of Erskine Mews which is accessible only from the arched entrance from Erskine Mews. All building materials, equipment and waste will be moved via that entrance. No cranes will be involved\*. The work will include removal of existing roofs, installation of new roofs with sedum covering and internal work to install new staircases, roof lights and windows, electrical, plumbing and fire suppression systems.

\*Will skips be involved?

# Appendix G: Air Quality Assessment



# Erskine Mews, Primrose Hill, Camden

## Air Quality Assessment

### Studio BAM Ltd

43 Stuart Road, London, SE15 3BE

Prepared by:

### SLR Consulting Limited

3<sup>rd</sup> Floor Summit House, Red Lion Square, London, WC1R 4QH

SLR Project No.: 425.066103.00001

Client Reference No: 139362

7 October 2024

Revision: 1.0

## Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1.0	7 October 2024	BP	DW	MF

## Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Studio BAM Ltd (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

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## 1.0 Introduction

SLR Consulting Ltd (SLR) has been commissioned by Studio BAM Ltd, to undertake an Air Quality Assessment to appraise the construction of four roof extensions to existing residential dwellings (the 'Consented Development') at 1,2, 3, 5 Erskine Mews, London, Camden, NW3 3AP (the 'Site').

The Site currently comprises of four existing residential dwellings, situated at the approximate National Grid Reference (NGR): x527908, y184042. The Site falls within the administrative area of the London Borough of Camden (LBoC). The surrounding area comprises:

- Existing residential dwellings and commercial properties in all directions enveloping the Site.

Vehicular access to the Site will be via the existing entrance off Erskine Road.

## 1.1 Application Background

A planning application has been previously submitted to LBoC (planning reference: 2022/2230/P) for the erection of four single storey roof extensions across 1, 2, 3 and 5 Erskine Mews. The application has received planning approval, subject to a Section 106 Legal Agreement. Further, it is understood an Air Quality Assessment has been requested by the LBoC.

## 1.2 Scope of Assessment

Pre-assessment consultation<sup>1</sup> was undertaken with the Environmental Health Officer (EHO) at LBoC to agree upon the scope and methodology of the assessment. However, at the time of writing no response to the proposed scope of works has been received.

Nonetheless, the scope of the assessment is based on national, regional and local guidance, as well as established best practice. In accordance with previous correspondence between the Applicant and LBoC, a 'Basic Air Quality Assessment' is required. However, it should be noted that, following LBoC's Air Quality Proforma flow chart, an Air Quality Assessment is not required. The following scope of works has been undertaken:

- Baseline Evaluation;
- Construction Phase Assessment;
- Operational Phase Site Suitability Assessment; and
- Mitigation Measures.

The energy strategy associated with the existing dwellings comprises gas-powered underfloor heating. Hot water is provided via a hot water tank and water cylinder. The energy strategy will remain unchanged with no new combustion systems proposed. As such, an assessment of emissions associated with on-site energy systems during the operational phase of the Consented Development has been scoped out.

Further, it has been assumed that there will be no additional operational vehicle trips associated with the Consented Development. As such, consideration of potential impacts associated with operational phase vehicle emissions has been scoped out.

---

<sup>1</sup> Email correspondence from SLR Consulting Limited to the Air Quality Department and LBoC, dated 30<sup>th</sup> September 2024.



As detailed above, the Consented Development is not anticipated to generate additional vehicle trips, introduce new parking, or include any additional on-site energy systems for space and water heating (emission sources). As such, the Consented Development is assumed to be AQN and is therefore excluded from requiring an AQN assessment, in accordance with the GLA AQN guidance<sup>2</sup>.

---

<sup>2</sup> GLA, London Plan Guidance: Air Quality Neutral, (2023).



## 2.0 Relevant Air Quality Context

### 2.1 Legislation

A dual set of regulations, separately applicable to National and Local Government, are currently operable within the UK.

#### 2.1.1 National Obligations

##### 2.1.1.1 Air Quality Standards

The Air Quality Standards Regulations 2010<sup>3</sup> (AQSR) transpose both the EU Ambient Air Quality Directive (2008/50/EC), and the Fourth Daughter Directive (2004/107/EC) within UK legislation, in order to align and mirror European obligations. The AQSR includes Limit Values which are legally binding ambient concentration thresholds which, however, are only applicable at specific locations (Schedule 1: AQSR)<sup>4</sup>. Carriageways or central reservations of roads, and any location where the public do not have access (e.g. industrial sites), are exempt. On this basis, if a sampling point does not comply with the siting locations, then strict comparison to the AQSR Limit Values cannot be made.

Following the UK's withdrawal from the EU, the Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020<sup>5</sup> was introduced to mirror revisions to supporting EU legislation. As a result, the fine particulate matter (as PM<sub>2.5</sub>) Limit Value is 20µg/m<sup>3</sup> (to be met by 2020).

The responsibility of achieving the AQSR (and European equivalent Directives) is a national obligation for Central Government who undertake assessments on an annual basis. Local Authorities have no statutory obligation to achieve the AQSR or the European equivalent Directives, unless otherwise instructed to assist Central Government under Ministerial Direction.

In response to persistent exceedances, the Government published its 2017 plan<sup>6</sup> for reducing roadside nitrogen dioxide (NO<sub>2</sub>) concentrations in order to achieve compliance in the shortest time possible. This has resulted in the introduction of Clean Air Zones across England. The Greater London Area was identified as requiring measures to be implemented to achieve concentration reduction, for which Part IV of the Environment Act 1995 placed the responsibility on the Mayor of London for the direction of such measures. The Mayor of London is taking forward a package of measures to achieve the statutory NO<sub>2</sub> limit values for London within the shortest possible time. The UK government's analysis has concluded that the Greater London Urban Area zone will achieve compliance in 2025 through measures including those identified within the Mayor's Air Quality Strategy 2010 which was latterly replaced by the London Environment Strategy 2018 (see Section 2.2.2.1).

---

<sup>3</sup> The Air Quality Standards Regulations (England) 2010, Statutory Instrument No 1001, The Stationary Office Limited.

<sup>4</sup> Schedule 1 of the 2010 AQSR provides the locations of the sampling points where the AQSR Limits Values can be assessed.

<sup>5</sup> The Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020, Statutory Instrument No. 1313, The Stationary Office Limited.

<sup>6</sup> UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations, (2017).





### 2.1.1.2 Environment Targets (Fine Particulate Matter) Regulations

The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023<sup>7</sup> introduced an annual mean concentration target of 10µg/m<sup>3</sup> to be met across England by 2040. Central Government and Devolved Administrations are responsible for meeting this target, however not until 2040. Local Authorities have no responsibility to achieve this target.

### 2.1.2 Local Obligations

Part IV of the Environment Act 1995 (as amended) requires the Secretary of State to publish a national Air Quality Strategy (AQS) every five years and established the system of Local Air Quality Management (LAQM) for Local Authorities to regularly review and assess air quality within its area.

The Air Quality (England) Regulations 2000 (as amended) ('the Regulations') provide the statutory basis for the Air Quality Objectives Local Authorities must adhere to under LAQM in England. PM<sub>2.5</sub> is not currently cited within the Regulations; Local Authorities are however required to work towards reducing PM<sub>2.5</sub>.

The Air Quality Objectives apply at locations where members of the public are regularly present and might reasonably be expected to be exposed to pollutant concentrations over the relevant averaging period (relevant exposure). Table B provides an indication of those locations. Where any of the prescribed Air Quality Objectives are not likely to be achieved, the authority must designate an Air Quality Management Area (AQMA). For each AQMA, the local authority is required to prepare an Air Quality Action Plan (AQAP), which details measures the authority intends to introduce to deliver improvements in local air quality and achieve compliance.

The latest AQS for England was published in 2023<sup>8</sup>. The AQS provides the delivery framework for air quality management across England for local authorities and summarises the air quality standards and objectives operable within England for the protection of public health and the environment.

The ambient air quality standards of relevance this assessment (collectively termed Air Quality Assessment Levels (AQALs) throughout this report) are provided in Table A. These are primarily based upon the Air Quality Objectives Local Authorities are responsible for achieving – reflective of the Local Planning Authority's duties. The PM<sub>2.5</sub> AQSR AQAL has, however, also been included for completeness, to provide an indicative assessment (as the sampling point may not comply with the siting locations prescribed under Schedule 1: AQSR).

**Table A: Relevant Ambient AQALs**

Pollutant	AQAL (µg/m <sup>3</sup> )	Averaging Period
NO <sub>2</sub>	40	Annual mean
	200	1-hour mean (not to be exceeded on more than 18 occasions per annum)
Particles (PM <sub>10</sub> )	40	Annual mean
	50	24-hour mean (not to be exceeded on more than 35 occasions per annum)

<sup>7</sup> The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023. UK Statutory Instruments 2023 No. 96.

<sup>8</sup> Air Quality Strategy: Framework for Local Authority Delivery, Department for Environment Food and Rural Affairs, (2023).



Pollutant	AQAL ( $\mu\text{g}/\text{m}^3$ )	Averaging Period
Particles ( $\text{PM}_{2.5}$ )	20	Annual mean
<b>Table Note:</b> The $\text{PM}_{2.5}$ AQAL is not prescribed within the Air Quality (England) Regulations 2000/2002 and there is no requirement for local authorities to meet it. Exceedances are only valid at the AQSR specific siting locations (Schedule 1: AQSR).		

**Table B: Human Health Relevant Exposure**

AQAL Averaging Period	AQALs should apply at	AQALs should not apply at
Annual Mean	Building facades of residential properties, schools, hospitals etc.	Facades of offices Hotels Gardens of residences Kerbside sites
24-hour mean	As above together with hotels and gardens of residential properties	Kerbside sites where public exposure is expected to be short term
1-hour mean	As above together with kerbside sites of regular access, car parks, bus stations etc.	Kerbside sites where public would not be expected to have regular access

### 2.1.3 Environmental Protection Act 1990

The Environmental Protection Act 1990<sup>9</sup> sets out provisions for the regulation of statutory nuisances. Section 79 sets out this statutory nuisance as, 'any dust, steam, smell or other effluvia arising on industrial, trade or business premises and being prejudicial to health or a nuisance'.

Section 79 requires that, where a complaint of a statutory nuisance is made to it by a person living within its area, a Local Authority must take steps as are reasonably practicable to investigate the complaint.

Fractions of dust greater than  $10\mu\text{m}$  (i.e. greater than  $\text{PM}_{10}$ ) in diameter typically relate to nuisance effects as opposed to potential health effects and therefore are not covered within the UK AQS. In legislation there are currently no numerical limits in terms of what level of dust deposition constitutes a nuisance.

## 2.2 Policy

### 2.2.1 National Policy

#### 2.2.1.1 Clean Air Strategy

The 2019 Clean Air Strategy<sup>10</sup> sets out the Government's proposals aimed at delivering cleaner air in England and indicates how devolved administrations intend to make emissions reductions. It sets out the comprehensive action that is required from across all parts of government and society to deliver clean air.

<sup>9</sup> The Environmental Protection Act 1990, UK Government, (1990). Available at: <http://www.legislation.gov.uk/ukpga/1990/43/contents>.

<sup>10</sup> The Clean Air Strategy, Department for Environment Food and Rural Affairs, (2019).



### 2.2.1.2 Environment Improvement Plan 2023

The 2023 Environment Improvement Plan<sup>11</sup> is the first revision of the UK Government's 25 Year Environment Plan (25YEP) – planned on a five-year rolling cycle. This document sets out the 5-year delivery plan to improve the natural environment. The 2023 Environment Improvement Plan builds on the 2019 Clean Air Strategy by setting environmental targets and commitments to reduce air pollution. Goal 2 of the 25YEP is Clean Air – which relates to improving air quality.

### 2.2.1.3 National Planning Policy Framework

The December 2023 update to the National Planning Policy Framework<sup>12</sup> (NPPF) sets out planning policy for England. The NPPF states that the planning system should contribute to and enhance the natural and local environment, by preventing new development from contributing to or being adversely affected by unacceptable concentrations of air pollution and development should, wherever possible, help to improve local environmental conditions such as air quality.

In specific relation to air quality policy, the document states:

*“Paragraph 180: 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 [...] air [...] pollution [...]. Development should, wherever possible, help to improve local environmental conditions such as air [...] quality [...].”*

*“Paragraph 191: 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.”*

*Para 192: Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, considering 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.”*

The NPPF is accompanied by web based supporting Planning Practice Guidance (PPG)<sup>13</sup> which includes guiding principles on how planning can take account of the impacts of new development on air quality. In regard to air quality, the PPG states:

*“The Department for Environment, Food and Rural Affairs carries out an annual national assessment of air quality using modelling and monitoring to determine compliance with relevant limit values. It is important that the potential impact of new development on air quality is taken into account where the national assessment*

---

<sup>11</sup> Environmental Improvement Plan 2023, Department for Environment Food and Rural Affairs, (2023).

<sup>12</sup> National Planning Policy Framework, Ministry of Housing, Communities & Local Government, (2023).

<sup>13</sup> Ministry of Housing, Communities and Local Government, Planning Practice Guidance Air Quality, (2019).



*indicates that relevant limits have been exceeded or are near the limit, or where the need for emissions reductions has been identified.”*

*“Whether air quality is relevant to a planning decision will depend on the proposed development and its location. Concerns could arise if the development is likely to have an adverse effect on air quality in areas where it is already known to be poor, particularly if it could affect the implementation of air quality strategies and action plans and/or breach legal obligations (including those relating to the conservation of habitats and species).”*

The PPG sets out the information that may be required within the context of a supporting air quality assessment, stating that *“Assessments need to be proportionate to the nature and scale of development proposed and the potential impacts (taking into account existing air quality conditions), and because of this are likely to be locationally specific [...] Mitigation options will need to be locationally specific, will depend on the proposed development and need to be proportionate to the likely impact”*.

## **2.2.2 Regional Policy**

### **2.2.2.1 London Environment Strategy**

The London Environment Strategy<sup>14</sup> is a strategic planning policy document developed by the Mayor of London. The strategy aims to tackle the environmental pressures associated with an ever-growing London populace. With particular regard to air quality, the policies that are set out in the London Environment Strategy aim to achieve the best air quality of any major world city by 2050; requiring the following primary actions:

- Reducing exposure of Londoners to harmful pollution across London – especially at priority locations like schools – and tackling health inequality;
- Achieving legal compliance with UK and EU limits as soon as possible, including by mobilising action from the London boroughs, government, and other partners; and
- Establishing and achieving new, tighter air quality targets for a cleaner London, meeting World Health Organisation (WHO) health-based guidelines by 2030 by transitioning to a zero emission London.

#### **2.2.2.2 London Plan 2021**

The London Plan<sup>15</sup> was formally adopted by the Greater London Authority (GLA) on 2<sup>nd</sup> March 2021. The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years (to the period 2041) and contains policies which are harmonious to those of Development Plan Documents to the 32 London boroughs.

The following policy relating to air quality is contained within the London Plan:

#### **“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.*

---

<sup>14</sup> Greater London Authority, May 2018, London Environment Strategy.

<sup>15</sup> Mayor of London, The London Plan, (2021).



- 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 at 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 in 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 retro-fitted mitigation measures.*
    - 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 positive approach. To achieve this a statement should be submitted demonstrating:*
- a) how proposals have considered ways to maximise benefits to local air quality, and*
  - b) what measures or design features will be put in place to reduce exposure to pollution, and how 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.”*





## 2.2.3 Local Policy

### 2.2.3.1 Camden Council Local Plan

The Camden Local Plan<sup>16</sup> was adopted in July 2017 and replaces the previous Core Strategy and Development Policies planning documents as the basis for planning decisions and future development in Camden. Within the Local Plan, the following policies relate to air quality and general development principles:

#### ***“Policy A1 Managing the Impact of Development***

*The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.*

*We will:*

- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected [...]*
- d. require mitigation measures where necessary. [...]*

*The factors we will consider include: [...]*

- i. impacts of the construction phase, including the use of Construction Management Plans.*
- k. odour, fumes and dust. [...]*”

#### ***“Policy A1 Managing the Impact of Development***

*The Council will ensure that the impact of development on air quality is mitigated and 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.”*

### 2.2.3.2 Camden Council’s Clean Air Action Plan 2022-2026

As part of their duty to London Local Air Quality Management (LLAQM), LBoC are required to regularly review and assess air quality within the Borough and determine whether or not the air quality objectives are likely to be achieved.

LBoC produced a Clean Air Action Plan covering the period from 2022 to 2026<sup>17</sup> which outlines the actions that the Council will take to improve air quality within their area during this period. LBoC’s actions have been considered under seven broad topics, including:

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<sup>16</sup> LBoC, Camden Local Plan (2017),

<sup>17</sup> LBoC, Camden Clean Air Action Plan 2023-2026, (2022).



- Reducing emissions from construction;
- Reducing emissions from buildings;
- Reducing emissions from transport;
- Supporting communities and schools;
- Indirect emissions and lobbying;
- Public health and awareness; and
- Indoor air quality and occupational exposure.

The LBoC Clean Air Action Plan is to be read alongside the Camden Clean Air Strategy 2019-2034<sup>18</sup> which provides the overarching vision for clean air in the Borough.

## 2.3 Assessment Guidance

The assessment has been carried out in accordance with the principles contained within the following guidance documents.

- Defra: Local Air Quality Management Technical Guidance (LAQM.TG(22))<sup>19</sup>;
- Defra: COVID-19: Supplementary Guidance. Local Air Quality Management Reporting in 2021<sup>20</sup>;
- Environmental Policy Implementation Community (EPIC) (previously Environmental Protection UK (EPUK)) and the Institute of Air Quality Management (IAQM): Land-Use Planning and Development Control: Planning for Air Quality<sup>21</sup> (the 'EPIC & IAQM guidance');
- GLA: The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance (SPG)<sup>22</sup> (the 'GLA SPG');
- GLA: London Local Air Quality Management Technical Guidance LLAQM.TG(19)<sup>23</sup>;
- IAQM: Guidance on the Assessment of Dust from Demolition and Construction<sup>24</sup> (the 'IAQM Dust guidance'); and
- IAQM: Position Statement: Use of 2020 and 2021 Monitoring Datasets<sup>25</sup>.

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<sup>18</sup> LBoC, Camden Clean Air Strategy 2019-2034, (2022).

<sup>19</sup> Local Air Quality Management Technical Guidance 22, Published by Defra in partnership with the Scottish Government, Welsh Government and Department of Agriculture, Environment and Rural Affairs, (2022).

<sup>20</sup> Defra and the GLA, COVID-19: Supplementary Guidance. Local Air Quality Management Reporting in 2021, (2021).

<sup>21</sup> EPIC (previously EPUK) & IAQM, Land-Use Planning and Development Control: Planning for Air Quality, v1.2, (2017).

<sup>22</sup> Mayor of London, The Control of Dust and Emissions during Construction and Demolition, Supplementary Planning Guidance, (2014).

<sup>23</sup> Mayor of London, London Local Air Quality Management Technical Guidance LLAQM.TG(19), (2019).

<sup>24</sup> IAQM, Guidance on the Assessment of Dust from Demolition and Construction, v2.2, (2024).

<sup>25</sup> IAQM, Position Statement: Use of 2020 and 2021 Monitoring Datasets, v1.1, (2023).



## 3.0 Assessment Methodology

### 3.1 Construction Phase

#### 3.1.1 Construction Phase Dust Emissions

A construction dust assessment has been undertaken with reference to the GLA SPG and the IAQM guidance. Paragraph 4.6 of the SPG states: *“the approach outlined [...] is based on the site evaluation process set out in the IAQM’s 2014 Guidance on the Assessment of dust from demolition and construction. This guidance is periodically updated and, therefore, the latest version of the IAQM Guidance should be used”*.

As such, the assessment of construction dust has taken into consideration the latest guidance published by the IAQM<sup>24</sup>. The assessment of risk is determined by considering the risk of dust effects arising from four activities in the absence of mitigation:

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

The assessment methodology considers three separate dust impacts with account being taken of the sensitivity of the area that may experience these effects:

- Annoyance due to dust soiling;
- The risk of health effects due to an increase in exposure to PM<sub>10</sub>; and
- Harm to ecological receptors.

The first stage of the assessment involves a screening review to determine if there are sensitive receptors within threshold distances of the site activities associated with the construction phase of the scheme. A detailed assessment is required where a:

- Human receptor is located within 250m of the Site, and/or within 50m of routes used by construction vehicles, up to 250m from the site entrance(s); and/or
- Ecological receptor is located within 50m of the Site, and/or within 50m of routes used by construction vehicles, up to 250m from the site entrance(s).

The dust emission class (or magnitude) for each activity is determined on the basis of the guidance, indicative thresholds and professional judgement by a technically competent assessor. The risk of dust effects arising is based upon the relationship between the dust emission magnitude and the sensitivity of the area. The risk of impact is then used to determine the appropriate mitigation requirements, whereby through effective application, residual effects are considered to be ‘not significant’.

Given the short-term nature of the construction phase and the comparatively low volume of vehicle movements that will likely arise, it is unlikely that significant air quality effects from development related road traffic emissions during the construction phase will arise. Such potential effects have therefore been scoped out from requiring detailed assessment, and will result in an ‘insignificant’ effect on air quality in reference to the EPIC & IAQM guidance.

#### 3.1.2 Construction Phase Plant Emissions Assessment

Emissions from construction plant, as non-road mobile machinery (NRMM) have been screened with reference to the GLA SPG.



## 3.2 Operational Phase

### 3.2.1 Site Suitability Assessment

In relation to road traffic emissions, an exposure assessment is required to assess the likely exposure that future occupants associated with the Development may experience to ensure the Site is suitable for its intended residential use.

As part of the Site suitability assessment, a review of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations, has been undertaken following the recommendations of the EPIC & IAQM guidance as follows:

- The background and future baseline air quality and whether this will likely approach or exceed an AQAL with reference to existing monitoring or modelling data in the vicinity of the Site;
- The presence and location of an AQMA and/or Air Quality Focus Area (AQFA) as an indicator of local hotspots where the AQALs may be exceeded; and
- The presence of a heavily trafficked road, with emissions that could give rise to sufficiently high concentrations of pollutants, that could cause unacceptably high exposure for users of the new development.

### 3.2.2 Assessing Significance

To determine the significance of predicted air quality impacts based upon a site-suitability assessment, the EPIC & IAQM guidance states:

*“Where the air quality is such that an air quality objective at the building façade is not met, the effect on residents or occupants will be judged as significant, unless provision is made to reduce their exposure by some means.”*

In line with this, likely pollutant concentrations at the Site are compared to the AQALs to determine whether further consideration is required or whether effects can be considered ‘not significant’.



## 4.0 Baseline Environment

### 4.1 Baseline Air Quality

Pollutant concentrations monitored during 2020 and 2021 (i.e. affected by the COVID-19 pandemic) are expected to be atypical and not representative of the local environment. Whilst not considered for the determination of baseline conditions as per Defra guidance and the IAQM Position Statement, they have been presented for completeness. In relation to the use of 2022 as the baseline year, the IAQM Position Statement states *“the “new-normal” pattern of activity and hence emissions appear to be stabilising. Therefore, ambient air quality monitoring data for the year 2022 and beyond is generally considered to represent the current post-pandemic baseline”*.

#### 4.1.1 LLAQM Review and Assessment

LBoC, in fulfilment of statutory requirements, has conducted an on-going exercise to review and assess air quality within their administrative area. The latest publicly available Annual Status Report (ASR) for LBoC at the time of writing is the 2023 ASR<sup>26</sup>. The monitoring data published therein has been used for the purpose of informing this assessment.

LBoC currently has declared a borough-wide AQMA (referred to as the ‘Camden AQMA’). The AQMA was declared in 2002 due to exceedances of the annual mean NO<sub>2</sub> AQAL and the 24-hour mean PM<sub>10</sub> AQAL at locations of relevant public exposure.

There are several AQFAs located in Camden. The closest of which is the ‘Camden High Street from Mornington Crescent to Chalk Farm and Camden Road’ AQFA located approximately 680m to the east of the Site. AQFA are designated for exceeding the EU annual mean NO<sub>2</sub> limit value with high human exposure.

#### 4.1.2 Review of Air Quality Monitoring

##### 4.1.2.1 Automatic Air Quality Monitoring

Automatic air quality monitoring is undertaken at two locations within the administrative boundary of LBoC. The nearest automatic monitor to the Site is located approximately 1km to the west of the Site within the Camden High Street AQFA referenced above. Given the separation distance and anticipated differences in local environments, pollutant concentrations are not anticipated to be representative of the Site and, as such, no automatic monitoring has been considered further.

##### 4.1.2.2 Passive Diffusion Tube Monitoring

Passive NO<sub>2</sub> diffusion tube monitoring is currently undertaken by LBoC within the Site locale, at numerous locations.

The details and results of the monitoring locations of relevance to the Site are presented in Table C and Table D respectively, whilst their locations are illustrated in Figure A. All monitoring data presented has been ratified by LBoC.

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<sup>26</sup> LBoC, Air Quality Annual Status Report for 2023, (2024).



**Table C: Local NO<sub>2</sub> Diffusion Tube Monitoring Sites: Details**

Site ID	Site Type	NGR (m)		Height (m)	Approximate Distance (km) and Direction to the Site
		X	Y		
CAM134	Roadside	528119	184354	2.5	0.3
CAM173	Roadside	527517	184159	2.5	0.3
CAM176	Roadside	527496	184210	2.5	0.4
CAM177	Roadside	527595	184210	2.5	0.2
CAM178	Roadside	527582	184132	2.5	0.2

**Table D: Local NO<sub>2</sub> Diffusion Tube Monitoring Sites: Results**

Site ID	2023 Data Capture %	Annual Mean NO <sub>2</sub> Concentration (µg/m <sup>3</sup> )				
		2019	2020	2021	2022	2023
CAM134	92	31.4	22.2	20.9	21.5	23.3
CAM173	100	-	-	21.8	19.1	22.0
CAM176	92	-	-	24.0	22.3	23.6
CAM177	83	-	-	23.0	22.1	24.5
CAM178	100	-	-	25.0	22.0	24.5

As shown in Table D above, there were no exceedances of the annual mean NO<sub>2</sub> AQAL over the presented period. All monitoring locations presented are classified as ‘roadside’<sup>27</sup> sites where NO<sub>2</sub> concentrations are likely to be dominated by road traffic emission contributions and elevated relative to the Site, which is set back >10m from the roadside.

The empirical relationship given in LLAQM.TG(19) states that exceedances of the 1-hour mean NO<sub>2</sub> AQAL are unlikely where annual mean concentrations are <60µg/m<sup>3</sup>. This indicates that exceedances of the 1-hour mean NO<sub>2</sub> AQAL are unlikely to have occurred at these sites during the period presented.

#### 4.1.3 London Atmospheric Emissions Inventory (LAEI) Concentrations

The LAEI provides modelled 2019 ground level annual mean roadside concentrations for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> modelled at a 20m grid square resolution across London, as provided by the GLA<sup>28</sup>. The reported annual mean NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations which are centred upon the Site are provided in Table E.

As per Table E, the maximum reported 2019 annual mean NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations at the Site are below the AQAL. Furthermore, no exceedances of the short-term NO<sub>2</sub> and PM<sub>10</sub> AQALs are likely to have occurred in accordance with the empirical relationship given in LLAQM.TG(19) and LAQM.TG(22), respectively.

<sup>27</sup> ‘Roadside’ sites are defined by LLAQM.TG(19) as: “A site sampling typically within one to five metres of the kerb of a busy road (although distance can be up to 15m from the kerb in some cases).”

<sup>28</sup> GLA, London Atmospheric Emissions Inventory (LAEI) 2019, Available at: <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2019>.





**Table E: Maximum 2019 LAEI Pollutant Concentrations Relevant to the Site**

Annual Mean Concentration ( $\mu\text{g}/\text{m}^3$ )			Daily $\text{PM}_{10}$ Means in Excess of $50\mu\text{g}/\text{m}^3$
$\text{NO}_2$	$\text{PM}_{10}$	$\text{PM}_{2.5}$	
32.8	17.6	11.4	6

#### 4.1.4 Defra Mapped Background Concentrations

Defra maintains a nationwide model<sup>29</sup> of existing and future background air quality concentrations at a 1km grid square resolution which is routinely used to support LAQM requirements and air quality assessments. The datasets include annual average concentration estimates for  $\text{NO}_2$ ,  $\text{PM}_{10}$  and  $\text{PM}_{2.5}$  using a reference year of 2018 (the year in which comparisons between modelled and monitored concentrations are made).

The annual mean background concentrations of  $\text{NO}_2$ ,  $\text{PM}_{10}$  and  $\text{PM}_{2.5}$  have been obtained from the Defra published background maps (2018 reference year), based on the 1km grid square which covers the Site. The Defra mapped background concentrations for a base year of 2023 and the earliest anticipated opening year for the Consented Development (2025) are presented in Table F.

**Table F: Defra Background Pollutant Concentrations**

Grid Square (X, Y) (m)	Year	Annual Mean Concentration ( $\mu\text{g}/\text{m}^3$ )		
		$\text{NO}_2$	$\text{PM}_{10}$	$\text{PM}_{2.5}$
548500, 186500	2023	23.9	17.2	11.1
	2025	22.8	16.8	10.8
<b>AQAL</b>		<b>40</b>	<b>40</b>	<b>20</b>

All the mapped background concentrations are 'well-below' the respective annual mean AQALs in 2023, with all concentrations reducing further by 2025 (the predicted opening year of the Consented Development).

#### 4.1.5 London Ultra Low Emissions Zone

The Site is located within the current extent of the London Ultra Low Emissions Zone (ULEZ). The ULEZ originally became effective from 25<sup>th</sup> October 2021, but later expanded across all London boroughs on 29<sup>th</sup> August 2023, covering the Site.

The introduction of the extended ULEZ is anticipated to result in improved air quality, specifically concentrations of  $\text{NO}_2$ , at locations within the ULEZ. This has been evidenced through the Inner London Ultra Low Emission Zone Expansion One Year Report<sup>30</sup> which found that:

- Vehicles traveling in London are increasingly cleaner. The overall ULEZ compliance rates have continued to increase, with 94.4% of vehicles seen driving in the zone on an average day meeting the ULEZ standards a year following the expansion, compared to just 39% when the expansion was announced in 2017;

<sup>29</sup> Defra, Background Mapping data for local authorities - 2018. Available at: <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018>.

<sup>30</sup> <https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/environment-and-climate-change-publications/inner-london-ultra-low-emission-zone-expansion-one-year-report>.



- Substantial reductions in NO<sub>2</sub> concentrations were seen at roadside locations, with a 47% reduction in inner London. Background monitoring sites away from the main road network also had significant reductions in NO<sub>2</sub> of 45% in inner London, since 2017; and
- NO<sub>2</sub> levels have not returned to those experienced pre-pandemic, indicating that even as traffic levels have risen; cleaner vehicles in the fleet caused by the ULEZ and its expansion, have had sustained and positive impacts on air pollution meaning concentrations continue to be far below what they would have been otherwise.

The improving air quality baseline is evidenced through the monitoring data presented within Table D, Table E and Table F. Furthermore, it is reasonable to assume there would be continued emissions reduction / improving ambient air quality in later years as associated with the successful implementation of the ULEZ.



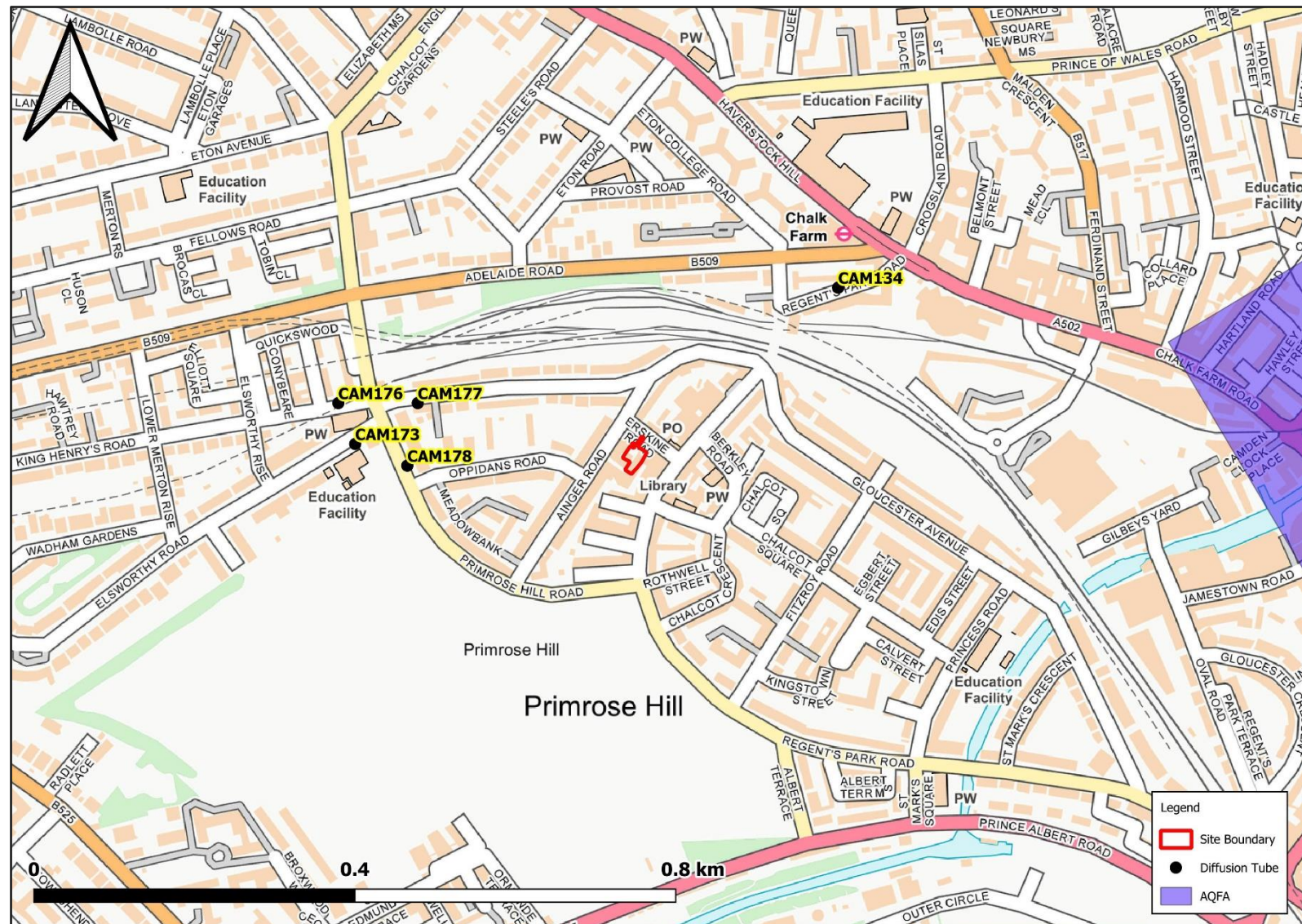


Figure A: Monitoring Locations and AQFA Relative to the Site.



## 5.0 Construction Phase Assessment

This section presents the potential air quality impacts and effects associated with the construction phase of the Consented Development.

### 5.1 Construction Dust Assessment

Where figures relating to area and volume of the Site, approximate number of construction vehicles or distances to receptors are given, these relate to thresholds as defined in the IAQM Dust guidance to guide the assessor to define the dust emissions magnitude and area sensitivity.

#### 5.1.1 Assessment Screening

There are 'human receptors' within 250m of the Site boundary and within 50m of the roads up to 250m from the Site entrance anticipated to witness construction traffic movements. No designated habitat sites are located within 50m of the Site boundary or within 50m of the roads up to 250m from the Site entrance anticipated to witness construction traffic movements. Therefore, an assessment of construction dust on human receptors only, is required.

#### 5.1.2 Potential Dust Emissions Magnitude

##### 5.1.2.1 Demolition

The Site currently comprises existing residential dwellings which are to be retained and extended at roof level. As no existing buildings or structures are proposed to be demolished, consideration of impacts associated with demolition has been scoped out.

##### 5.1.2.2 Earthworks

The Site has been previously developed with existing residential dwellings present. Due to the nature of the Consented Development (i.e. roof extensions), it is assumed that no earthworks will be required. As such, consideration of impacts associated with earthworks activities has been scoped out of this assessment.

##### 5.1.2.3 Construction

The total building volume associated with the Consented Development is estimated to be between  $<12,000\text{m}^3$ . Construction material is expected to comprise of material with a low potential for dust release (i.e. zinc cladding). As such, the dust emission magnitude for construction is therefore considered to be 'small'.

##### 5.1.2.4 Trackout

Based on scale and nature of the Site along with height restricted access off Erskine Road, HDV ( $>3.5\text{t}$ ) movements are expected to be minimal. In addition, there are not expected to be any sections of unpaved roads. However, in order to provide a conservative assessment, it has been assumed there would be some HDVs leaving the Site carrying dusty material that may spill onto the road. As such,  $<20$  outward HDV movements are expected in any worst-case day. As such, the dust emission magnitude for trackout is therefore considered to be 'small'.





**Table G: Potential Dust Emission Magnitude**

Activity	Dust Emission Magnitude
Construction	Small
Trackout	Small

### 5.1.3 Sensitivity of the Area

#### 5.1.3.1 Dust Soiling Impacts

There are estimated to be 10-100 high sensitivity receptors (i.e. residential dwellings) within 20m of the Site. In addition, there are anticipated to be 10-100 highly sensitive receptors within 20m of the Site access up to 250m from the Site (assuming construction vehicles route east and west along Erskine Road towards the main roads).

The sensitivity of the area with respect to dust soiling effects on people and property in relation to both construction and trackout is therefore considered to be 'high'.

#### 5.1.3.2 Human Health Impacts

The maximum 2022 mapped background PM<sub>10</sub> concentration (2018 base year) for the 1km<sup>2</sup> grid squares covering the Site (see Section 4.1.4) is estimated to be 17.2µg/m<sup>3</sup> (i.e. falls into the <24µg/m<sup>3</sup> class).

Given the above information regarding the number of high sensitivity receptors within 20m of the Site and within 20m of access route(s) up to 250m from the Site entrance, the sensitivity of the area with respect to human health impacts is therefore considered to be 'low' for both construction and trackout, as presented in Table H.

**Table H: Sensitivity of the Area**

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

### 5.1.4 Risk of Impacts (Unmitigated)

The outcome of the assessment of the potential 'magnitude of dust emissions', and the 'sensitivity of the area' are combined in Table I below to determine the risk of impact which is used to inform the selection of appropriate mitigation.

**Table I: Risk of Dust Impacts**

Potential Impact	Construction	Trackout
Dust Soiling	Low Risk	Low Risk
Human Health	Negligible	Negligible

### 5.1.5 Mitigation

Following the construction dust assessment, the Site is found to be at worst 'low risk' in relation to dust soiling effects on people and property, and 'negligible' in relation to human health impacts (Table I). However, potential dust effects during the construction phase are



considered to be temporary in nature and may only arise at particular times (i.e. certain activities and/or meteorological conditions).

Nonetheless, commensurate with the above designation of dust risk, best practice mitigation measures, as identified by IAQM Dust guidance are required to ensure that any potential impacts arising from the construction phase of the Consented Development are reduced and, where possible, completely removed. In accordance with IAQM Dust guidance, providing effective mitigation measures are implemented, such as those outlined in Section 7.1, construction dust effects are considered to be 'not significant'.

## 5.2 Construction Phase Plant Emissions

NRMM refers to mobile machines, transportable industrial equipment or vehicles which are fitted with an internal combustion engine and not intended for transporting goods or passengers on roads.

Pollutants emitted by NRMM that may have the most significant potential effects on local air quality are particulate matter (as PM<sub>10</sub> and PM<sub>2.5</sub>), and nitrogen oxides (NO<sub>x</sub>) / NO<sub>2</sub>. Typically, NRMM is associated with construction sites and, therefore there is a potential for NRMM emissions to adversely affect local air quality as a result of the Consented Development.

In accordance with Part 7 of the GLA's SPG, all construction plant would adhere to the emissions standards for NO<sub>2</sub> and PM<sub>10</sub> set out for NRMM standards. It is therefore considered the likely effect of NRMM emissions on local air quality would be 'insignificant'.

The Site is not located within London's NRMM Central Activities Zone (CAZ) or Opportunity Areas (OAs)<sup>31</sup>. The current NRMM standard applicable to the Site (in Greater London) is currently Stage IIIB, will increase to Stage IV between 2025-2029, and increase again to Stage V between 2030-2039.

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<sup>31</sup> Non-Road Mobile Machinery (NRMM). Available at: <https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/pollution-and-air-quality/nrmm>.







Figure B: Construction Dust Assessment Buffers





## 6.0 Operational Phase Site Suitability Assessment

The following section presents a qualitative assessment of the suitability of the Site in reference to the proposed residential use.

The Site is currently occupied by existing residential dwellings, which are to be retained and extended at roof level. Whilst the Site is located within the LBoC AQMA, the Site is set back approximately 10m from the nearest road (Erskine Road), with existing residential properties located between, thus acting to shield the site from local road traffic emissions.

With reference to the information already discussed in Section 4.0, the following has been used to inform the Site suitability assessment:

- The nearest LBoC diffusion tube monitors show annual mean NO<sub>2</sub> concentrations have been 'well below' the AQAL in 2023 (i.e. <75% of the AQAL). All monitors presented are situated at 'roadside'<sup>27</sup> locations where annual mean NO<sub>2</sub> concentrations are expected to be greater than at the Site based on increased setback distances from the roadside (>10m);
- Defra mapped background concentrations are 'well-below' the relevant NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> AQALs for the 1km grid square containing the Site in 2023 (base year) and 2025 (earliest anticipated opening year);
- Maximum LAEI predicted annual mean NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations for 2019 (a conservative year given the national declining trend in concentrations) covering the Site are 'well-below' the relevant AQALs. The maximum LAEI predicted short-term PM<sub>10</sub> concentrations are also below the AQAL (see Section 4.1.3);
- Erskine Road is not believed to be heavily trafficked based on the local setting (i.e. <10,000 annual average daily traffic (AADT));
- NO<sub>2</sub> concentrations are expected to decline further when accounting for national trends, such as improvements to the national vehicle fleet and the implementation (and subsequent expansions) of Clean Air Zones in London. The Site is located within the Ultra-low Emissions Zone<sup>32</sup> (ULEZ) which charges vehicles that do not meet the required emissions standards when driving within the zone.

On the basis of the above, ambient pollutant concentrations are considered to be below the considered relevant long-term and short-term AQALs and, therefore, the Site is considered to be suitable for the Consented Development by means of natural ventilation (e.g. openable windows), in reference to the EPIC & IAQM guidance. Overall, Site suitability air quality effects are concluded to be 'not significant'.

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<sup>32</sup> Ultra-low Emissions Zone Standards. Available at: <https://tfl.gov.uk/modes/driving/ultra-low-emission-zone/ways-to-meet-the-standard>.



## 7.0 Mitigation Measures

This section presents any proportionate mitigation measures required during the construction and operational phases of the Consented Development.

### 7.1 Construction Phase Emissions

#### 7.1.1 Construction Dust

As discussed in Section 5.0, construction impacts associated to the Consented Development would result in the generation of dust and PM<sub>10</sub>.

In order to control potential impacts, Table J presents a range of mitigation measures which could be applied and align with the IAQM Dust guidance. With the effective application of the dust mitigation measures, residual effects will be 'not significant'.

**Table J: Construction Dust Mitigation Measures**

Site Application	Mitigation Measures
<b>Highly Recommended</b>	
Communications	Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager.
	Display the head or regional office contact information.
Monitoring	Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the local authority when asked.
	Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.
	Agree dust deposition, dust flux, or real-time PM <sub>10</sub> continuous monitoring locations with the Local Authority. Where possible commence baseline monitoring at least three months before work commences on site or, if it a large site, before work on a phase commences. Further guidance is provided by IAQM on monitoring during construction.
Operating Vehicle/Machinery and Sustainable Travel	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 practicable.
	Ensure all on-road vehicles comply with the requirements of the London Low Emission Zone and the London NRMM standards, where applicable.
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 suppression/mitigation, using non-potable water where possible and appropriate.
	Use enclosed chutes and 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.



Preparing and Maintaining the Site	Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.
	Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site.
	Avoid site runoff of water or mud.
Site Management	Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken.
	Make the complaints log available to the local authority when asked.
	Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the log book.
Waste Management	Avoid bonfires and burning of waste materials.
<b>Desirable</b>	
Communications	Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority. The level of detail will depend on the risk, and should include as a minimum the highly recommended measures in this document. The desirable measures should be included as appropriate for the site. In London additional measures may be required to ensure compliance with the Mayor of London's guidance. The DMP may include monitoring of dust deposition, dust flux, real time PM <sub>10</sub> continuous monitoring and/or visual inspections.
Construction	Avoid scabbling (roughening of concrete surfaces) if possible.
	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.
Monitoring	Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100m of site boundary, with cleaning to be provided if necessary.
Operating Vehicle/Machinery and Sustainable Travel	Impose and signpost a maximum-speed-limit of 15mph on surfaced and 10mph on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).
Operations	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.
Preparing and Maintaining the Site	Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.
	Keep site fencing, barriers and scaffolding clean using wet methods.
	Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below.
	Cover, seed or fence stockpiles to prevent wind whipping.
Trackout	Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.
	Avoid dry sweeping of large areas.



	Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
	Record all inspections of haul routes and any subsequent action in a site log book.
	Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).

### 7.1.2 NRMM Emissions

NRMM and plant should be well maintained. If any emissions of dark smoke occur, then the relevant machinery should stop immediately and any problem be rectified. In addition, the following controls should apply to NRMM:

- All NRMM should use fuel equivalent to ultralow sulphur diesel;
- All NRMM should comply with the current Staged Emission Standards (see Section 5.2);
- All NRMM should be fitted with Diesel Particulate Filters (DPF) conforming to defined and demonstrated filtration efficiency (load/duty cycle permitting);
- The on-going conformity of plant retrofitted with DPF, to a defined performance standard; and
- Implementation of fuel conservation measures including instructions to throttle down or switch off idle construction equipment; switch off the engines of trucks while they are waiting to access the site and while they are being loaded or unloaded, ensure equipment is properly maintained to ensure efficient fuel consumption.

Successful implementation of the above mitigation measures would ensure that emissions from NRMM used during construction are 'not significant'.

## 7.2 Operational Phase Site Suitability Assessment

The Site is found suitable for the proposed use and specific air quality ventilation measures are not required for the assessed pollutants (i.e. NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>).



## 8.0 Conclusions

SLR Consulting Ltd has been commissioned by Studio BAM Ltd to undertake an air quality assessment to appraise a planning application for the construction of four roof extensions to existing residential dwellings Erskine Mews, Camden.

### 8.1 Construction Phase

A qualitative assessment of the potential dust impacts during the construction of the Consented Development has been undertaken following the IAQM Dust guidance.

Following the construction dust assessment, the Site is found to be at worst 'low risk' in relation to dust soiling effects on people and property, and 'negligible' for human health impacts. Providing effective mitigation measures are implemented, such as those outlined in Section 7.1.1 of this report, residual effects from dust emissions during the construction phase would be 'not significant'.

Given the short-term nature of the construction phase and the comparatively low volume of vehicle movements that will likely arise (when compared to the operational phase, for which a screening assessment has been undertaken), there is predicted to be an insignificant effect on air quality from construction-generated road traffic emissions.

Successful implementation of the appropriate mitigation measures (see Section 7.1.2) would ensure that emissions from NRMM used during construction are 'not significant'.

### 8.2 Operational Phase

A qualitative assessment of Site suitability has been undertaken with reference to publicly available air quality datasets. The Site is found to be suitable for the proposed use and unmitigated effects associated with the likely pollutant exposure of future occupants are considered to be 'not significant'.

