

**APPENDIX 2.3:  
EIA SCOPING REPORT LONDON BOROUGH OF  
CAMDEN ENVIRONMENTAL HEALTH OFFICER  
OBSERVATIONS**

**Boalch, Rosamund**

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**Subject:** FW: Environmental Health  
**Attachments:** Environmental Health.doc

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**From:** Whelan, Sara [<mailto:Sara.Whelan@Camden.gov.uk>]  
**Sent:** 30 November 2010 13:47  
**To:** Fiszpan, Hannah  
**Cc:** [NThompson@geraldeve.com](mailto:NThompson@geraldeve.com); Lisa Webb; Hannah Bizoumis  
**Subject:** Environmental Health

Dear Hannah,

Please see attached a further response from the Councils Environmental Health Officer regarding the EIA scoping response. Please do not hesitate to contact me regarding this response, otherwise please take any new points into account throughout the ES.

Thank you

Sara Whelan

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**To:** Sara Whelan – Development Control Team Town Hall Extension,  
5<sup>th</sup> Floor

**From:** Lee Casey

**Date:** 24<sup>th</sup> November 2010

**Re:** Land at 1-9 Chalk Farm Road, Hawley Wharf, adjacent railway  
arches and land at 1-8a Torbay Street and 1-17 Hawley Road and  
associated land.  
  
Redevelopment involving provision of new buildings comprising  
market retail, food and drink use, business workshops, leisure and  
residential uses, open space and related ancillary activities and  
works.

**Reference:** Planning Consultation 2010/4979/P

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## **ENVIRONMENTAL HEALTH OBSERVATIONS**

### **Relevant background information**

- 1. Proposal meets relevant policies and standards in Unitary Development Plan (UDP), Camden Planning Guidelines (CPG), Local Development Framework (LDF), Planning Policy Guidelines 24 (PPG24) and Planning Policy Statement 23 (PPS23)**

I have read the EIA Scoping report dated September 2010. The areas of the report relevant to the Compliance and Enforcement to make observation are noise and vibration control, and dust control and monitoring. My colleague Gloria Esposito in the Sustainability Team should be consulted on air quality matters relating to monitoring and control measures from other pollution sources during the development process.

I have considered each relevant section applicable to pollution issues and comment as follows:

### **Section 5.7 Development Programme Demolition and Construction**

The report states that demolition will be undertaken in a careful manner in a phased sequence over a number of years. Consideration has been given to the potential environmental impact of noise and dust control during demolition and construction.

However, further information will be required from the developer on the type of demolition plant / equipment that will be used, noise mitigation measures to be adopted as well as predicted noise levels at sensitive facades. The contractor should be advised to submit method statement detailing how they intend to control the impact of noise as well as dust during the demolition process. Consideration

should be given to various British Standards namely BS 5228-1:2009 Code of practice for noise and vibration control on construction and open sites noise and BS 5228-2:2009 Code of practice for noise and vibration control on construction and open sites Vibration, the Control of Pollution Act 1974. The developer should also be aware of the London Borough of Camden Considerate Contractor Manual.

We would encourage the developers to adopt the use of “best practicable means”. This principle considers cost implications but also requires that the best techniques and work methods be used if there is an environmental benefit.

### **Dust Control Measures**

- The demolition should be conducted from the inside out; therefore the façade of the building should be demolished last. By insuring this method is used the dust should be reduced, however the following should also be employed:
- The whole site should be adequately screened; a monoflex or a similar method of screening should be employed. The demolition process should be dampened down, the immediate working area should have an adequate water supply along with rubble chutes if used and also the skips should be dampened down when being filled.
- Rubble chutes and skips should be used where appropriate. There must be an effective close fitting cover at the point of discharge to the skip to contain all dust and debris. In addition the chutes should be continuous to the point of discharge, with no gaps and maintained in good condition.
- Skips should be screened and a secure tarpaulin should be in place when the skip is not in use to prevent dust escaping.
- Rubbish and waste materials must not be allowed to accumulate on site. A good standard of “house keeping” must be maintained.
- Wheel washing facilities for the vehicles should be provided at the entrances and exits, there should be adequate drainage to prevent the creation of large amounts of mud.
- Paved roads near to exits should be kept clean, and vehicles transporting dusty materials onto and off the site should be suitably covered.
- Major haul routes should be watered as necessary to minimise dust nuisance. Where practical they should be stabilised (e.g. compacted) to reduce off site transport of soil and other material.

### **Section 5.43 Noise and Vibration**

The report recognises the site is located in a busy mixed use area comprising of residential and commercial premises and the fact that the development will inevitably generate potentially high levels of noise and vibration during the demolition and construction activities.

In line with the Control of Pollution Act 1974 legislation we permits noisy works to be undertaken between the hours of 08:00 and 18:00 hrs Monday to Fridays, 08:00 to 13:00 hrs Saturdays and no noisy works, which are audible outside of these

permitted hours on Sundays and Bank holidays. However, where the noise will have an adverse impact on noise sensitive premises, quiet periods of working need to be employed to accommodate these premises by appropriate consultation process.

I would suggest that if this development is not subject to a 106 agreement, a local forum of local businesses and residential groups is formed. This forum could then come to agreements with regard to the quiet periods of working. Inevitably the demolition and construction work will create some level of noise, however with information on the timetable for the works and regular meetings between the parties to be affected and the contractors prior to the commencement of the project and throughout the work; this should hopefully appease some of the complaints.

Details for all plant/equipment to serve the commercial premises will need to be submitted will full manufacturers noise levels specifications and a confirmation and demonstration of how Camden's criteria will be met.

A method statement is required explaining what steps and controls will be put in place during construction to ensure that nuisance from noise, dust etc is prevented. It should include details on piling techniques, and deliveries.

There are other controls, which we would like to be employed by the developers/contractors to reduce the noise levels from the construction site, such controls would be:-

- Wherever possible fixed items of construction plant should be electrically powered rather than diesel or petrol driven. Where this is not practical suitable attenuation measures should be provided.
- Vehicle and mechanical plant used for the purpose of works should be fitted with effective exhaust silencers, be maintained in good and efficient working order and operated in such a manner so as to minimise noise emissions. Relevant EC Directives/ UK regulations should be complied with.
- Compressors must be "sound reduced" models, fitted with properly lined and sealed acoustic covers kept closed whenever the machine is in use. In addition pneumatic drills etc. must be fitted with the most effective muffler or silencer available.
- Machines in intermittent use should be shut down when not in use or throttled down to a minimum. Noise emitting equipment which is required to run continuously may have to be housed in suitable acoustic enclosures (refer to BS 5228-1:2009)
- Equipment which breaks concrete by pressure rather than by percussion or such other equipment as agreed with the Council should be used as far as reasonably practicable.
- There should be no impact-driven sheet piling in the majority of sites with in the borough. The Council expects contractors to use hydraulically operated vibrator methods to drive and extract sheet piling.
- Where practicable rotary drills and bursters, which are hydraulic or electrically powered, should be used for excavating hard materials.

- Noisy plant and equipment should be sited as far a way as possible from residential or other noise sensitive properties. Barriers e.g. soil banks; stockpiles of materials, site portacabins or proprietary acoustic barriers should be employed wherever possible.
- Care should be taken when loading and unloading vehicles, erecting and dismantling scaffolding and moving materials etc to keep noise to a minimum.
- All deliveries of materials, plant and machinery to the site and any removals of waste or other materials must take place within the permitted construction hours.
- The arrival of delivery vehicles to the site must be properly coordinated to prevent parking in streets while awaiting access to the site. The area in and around this site is very busy; the vehicle movements need to be closely controlled to prevent traffic congestion.
- There must be adequate planning to ensure that lengthy operations e.g., concrete pours can be completed within the permitted construction hours.
- No employees, sub contractors and persons employed on the site must cause unnecessary noise from their activities, e.g. excessive revving of vehicle engines, music from radios, shouting and general behaviour.

### **Miscellaneous**

- Lorries and plant with diesel or petrol engines on or of site should be well maintained in order to reduce emissions of visible smoke. Engines should not be left running unnecessarily and plant and vehicles must not be parked in a position, which could give rise to nuisance from exhaust fumes.
- When positioning tar boilers, consideration needs to be made with regard to the location of residents and businesses. The lid of the boiler should remain in place throughout the duration of the tar boiler being on site. The contractor is expected to use best practicable means to keep smoke emissions to a minimum.
- There shall be no on-site bonfires for any purpose whatsoever. Therefore, rot-affected timber from any demolition must be sprayed with a suitable fungicide/insecticide before removal from the site in covered skips etc.

Lastly, I believe the developer has provided a reasonable statement in the scoping report with regard to noise and vibration control. However, I recommend that the contractor deal with these matters through the use of Section 61 Control of the Pollution Act 1974 consents for various phases of the project. This would provide an essential way of continually managing the impacts at the various stages of the project and give opportunity to carefully consider demolition and construction methods for each phase of the project against the principles of best practicable means. It will allow changes to work practices, equipments and methods to be carefully considered. It will also provide the developers immunity from local authority action under the Environmental Protection Act 1990, Section 80 and Control of Pollution Act 1974, Section 60.

I trust the above is satisfactory. Should you require further clarification on the above please do not hesitate to contact me.

Lee Casey  
Supervising Principal Environmental Health Officer  
Planning and Public Protection  
Culture and Environment  
London Borough of Camden