Intended for
Stadium Capital Holdings

Document type
Report

Date
January 2018

MIDLAND CRESCENT
CONDITION NO 23 – PERMISSION REF: 2014/5527/P – AIR QUALITY

RAMBOLL

MIDLAND CRESCENT
CONDITION NO 23 – PERMISSION REF: 2014/ 5527/P – AIR QUALITY

Revision	**A**
Date	**26/01/2018**
Made by	**Victoria Gouge**
Checked by	**Lesley Vining**
Approved by	**Lesley Vining**
Description	**Air Quality Condition 23. 2014/5527/P**

Ref 1620003433/ENV/AQ

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APPENDICES

1. INTRODUCTION

1.0.1 Ramboll UK Limited (Ramboll) has been commissioned by Stadium Capital Holdings to undertake an air quality assessment in order to discharge Condition number 23 set out in the Planning Permission Ref 2014/5527/P - 279 Finchley Road, 'Midland Crescent'.

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1.1 Site Description and Location

1.0.5 The Site is centred approximately at Grid Reference 526089,184872 within the London Borough of Camden (LBC).

1.0.6 The Site is triangular in shape and is approximately 0.16ha in area. It is bounded by railway lines to the north and the south. Finchley Road (A41) at the eastern boundary is elevated by approximately 7m above the western corner of the site. A shopping centre is located beyond the railway lines immediately south of the site. Other commercial businesses and residential properties are located along Finchley Road.

1.2 Development Permission 2014/5527/P

1.0.7 The proposed development for which planning permission was granted in 2014 is detailed as: "Redevelopment of the site by the erection of a part 3, part 4 and part 5 storey building with a double level basement comprising flexible commercial space (Use Classes A1/A2/A3/A4/B1/D1 & D2) at lower basement and ground floor levels, 60 student bedrooms with communal kitchen, lounge and common room areas, and 9 residential dwellings (Class C3)".

1.2.1 Condition number 23 assigned to the permission is as follows: "*Dispersion modelling shall be undertaken to identify the optimum location for the inlet for mechanical ventilation, carbon filters must be added to the inlet. Details of the final location and filters must be submitted to and approved by LBC".*

1.2.2 Correspondence from Tessa Craig, Planning Officer at Camden Council, to Oliver Carr of HGH Planning, on the 10th January 2018, stated that "*We would normally state NOx filtration equipment or similar nowadays. Air filters these days can contain both activated carbon and G3. Either way, the filters should be specified by an expert to ensure adequate removal of NOx from the intake air."*

2. AIR QUALITY AND PLANNING POLICIES

2.0.1 Ramboll submitted an Air Quality Assessment Report (Document Ref 30030/ENV/R01)[1] in August 2014 to support the planning submission.

2.0.2 No changes to international or national polices have taken place since this report was submitted.

1.3 Camden Local Plan 2016-2031

1.3.1 The Camden Local Plan replaces the Core Strategy and Development Policies planning documents (adopted in 2010)[2]. The Local Plan covers the period from 2016-2031 and was adopted by LBC on 3rd July 2017.

2.0.3 Policy CC4 Air Quality within the Local Plan is detailed below:

"*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 Camden Clean Air Action Plan 2016 – 2018

2.0.1 LBC published a Clean Air Action Plan[3] in 2016 which replaced the draft Clean Air Action Plan 2013-2015. The Plan is divided into five sections: 1) Monitoring Air Quality in Camden; 2) Reducing emissions from buildings and new developments; 3) Reducing emissions from transport; 4) Raising awareness of air quality and 5) Lobbying and partnership working.

2.0.2 Table 2.1 below shows the relevant action included within Section 2 of the Clean Air Action Plan on reducing emissions associated with new developments. No other actions are included within the plan which are of relevance to this report.

Table 2.1: Camden Clean Air Action Plan Section 2 Reducing Emissions from Buildings and New Developments

Action	Detail	Timeframe	Outcome
16. Require developers to undertake an air quality assessment (AQA) in	Update planning policies where necessary to ensure that developers designate these sites with	Ongoing	- Reduces emissions (air pollutants) - Minimise exposure of sensitive

[1] Midland Crescent, Air Quality Assessment, Ramboll, 2014

[2] Camden Development Policies 2010-2025. London Borough of Camden, November 2010

[3] Camden's Clean Air Action Plan 2016-2018, London Borough of Camden, 2016

Action	Detail	Timeframe	Outcome
circumstances where a new development could have a negative impact on air quality where the development is adjacent to sensitive receptors such as schools, nurseries, hospitals and doctors' surgeries, or where the development will introduce new receptors into an area of existing poor air quality.	the correct risk level, and undertake mitigation and monitoring measures accordingly in subsequent Construction and/or Demolition Management Plans.		receptors near developments

3. METHODOLOGY

3.1 Scope of Report

3.0.1 The scope of this report is detailed below:

- Review of appropriate baseline and background air quality data and comparison to baseline conditions to standards;
- ADMS dispersion model calculations of NO_2 concentrations at various locations to identify the optimum location for the inlets for the mechanical ventilation (MVHR) units. Both the long term and short term concentrations of these pollutants to be assessed;
- Comparison of modelled pollutant concentrations to relevant national standards, to confirm suitability of the MVHR inlet locations; and
- Provision of information regarding inlet filters to be used within the building.

3.0.2 Emissions from the railway line have not been modelled as these emissions are included within the background concentrations used within the assessment.

3.2 Baseline Data Collation

3.0.1 Data has been collected from the following sources:

- DEFRA's UK Ambient Air Quality Interactive Map[4]; and
- London Air Website[5].

3.3 Prediction of Pollutant Concentrations

3.0.1 Pollutant concentrations have been predicted using ADMS Roads air quality dispersion model. The model uses traffic survey data and digitised meteorological observation data collected at a Met Office observation station representative of conditions at the site itself.

3.0.2 In accordance with DEFRA guidance, modelled baseline concentrations have been compared to measured concentrations and the modelled results adjusted accordingly. This process is known as model verification, and details of the procedure together with further details regarding the modelling calculations and methodology are given in Appendix A.

[4] https://uk-air.defra.gov.uk/data/gis-mapping

[5] http://www.londonair.org.uk/

3.0.3 A summary of the traffic data used in the assessment, detailing the annual average daily traffic (AADT) flows, average vehicle speeds and HGV percentages are presented in Appendix B.

3.0.4 For the development scheme scenario, conversion of NO_X to NO_2 has been undertaken using Version 6.1 of the NO_X to NO_2 conversion spread sheet released in November 2017 by AEA Technology PLC. Version 7.0 emissions factors have been used to calculate vehicle emissions of NO_X within ADMS. A worst-case emission year of 2016 has been utilised along with a road type of London (inner). City Airport 2016 has been used for the scheme modelling scenarios.

3.0.5 Background pollutant data from DEFRA's GIS Interactive Mapping[4] have been used to establish total pollutant concentrations.

3.0.6 Research [6],[7], has concluded that exceedances of the one-hour mean objective are unlikely to occur where annual mean concentrations do not exceed 60µg/m^3. This relationship has been used to assess whether exceedances of the hourly mean objective are likely.

4. BASELINE

4.0.1 The whole of the LBC has been designated as an Air Quality Management Area (AQMA) due to poor air quality. The eastern façade of the development fronts on to the A41 Finchley Road where air quality is likely to be heavily influenced from traffic. There are no industrial pollution sources in the immediate vicinity of the application site that will affect air quality.

4.1 Local Authority Monitoring Data

4.0.1 There are a number of monitoring stations operated by the LBC. The nearest automatic monitoring station is Swiss Cottage located approximately 650 m to the south east. This measures kerbside concentrations and is located at the kerb of the junction of three busy roads: Finchley Road; College Crescent and Swiss Cottage.

4.0.2 2016 annual mean data from London Air[5] shows concentrations at Swiss Cottage to be 66 µg/m^3 for NO_2 which is above the UK Air Quality Objective Level of 40 µg/m^3.

4.2 London Atmospheric Emissions Inventory (LAEI) 2013

4.0.1 The LAEI provides maps that estimate key pollutants (NOx, PM_{10}, $PM_{2.5}$ and CO_2) for the base year of 2013 and projected forward years of 2020, 2025, and 2030. Figure 4.1 below shows the 2013 LAEI map for the development site location.

[6] D Laxen and B Marner, Analysis of the relationship between one-hour and annual mean nitrogen dioxide at UK roadside and kerbside monitoring sites, July 2003

[7] Cook A, Analysis of the relationship between annual mean nitrogen dioxide concentration and exceedances of the one-hour mean AQS, May 2008

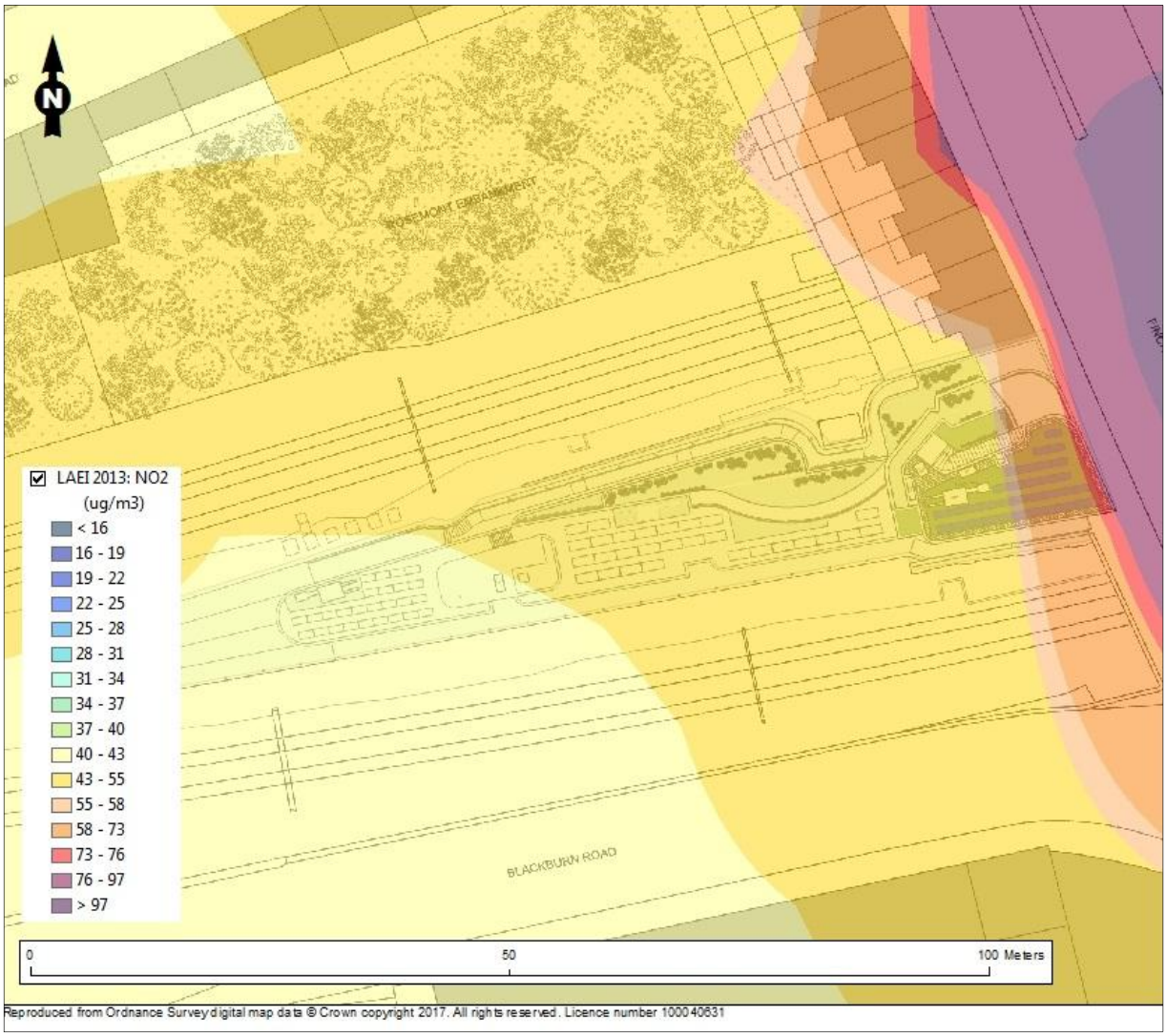


Figure 4-1: LAEI 2013 NO_2 Concentration Map 2013

4.3 DEFRA's UK Ambient Air Quality Interactive Map

4.0.1 DEFRA's interactive tool allows exploration of ambient air quality concentration data from DEFRA's national Pollution Climate Mapping modelling.

4.0.2 Background pollutant concentrations have been utilised within the modelling for the most recent year (2015). The development site area for NO_2 and NO_X are displayed below in Figures 4.2 and 4.3:

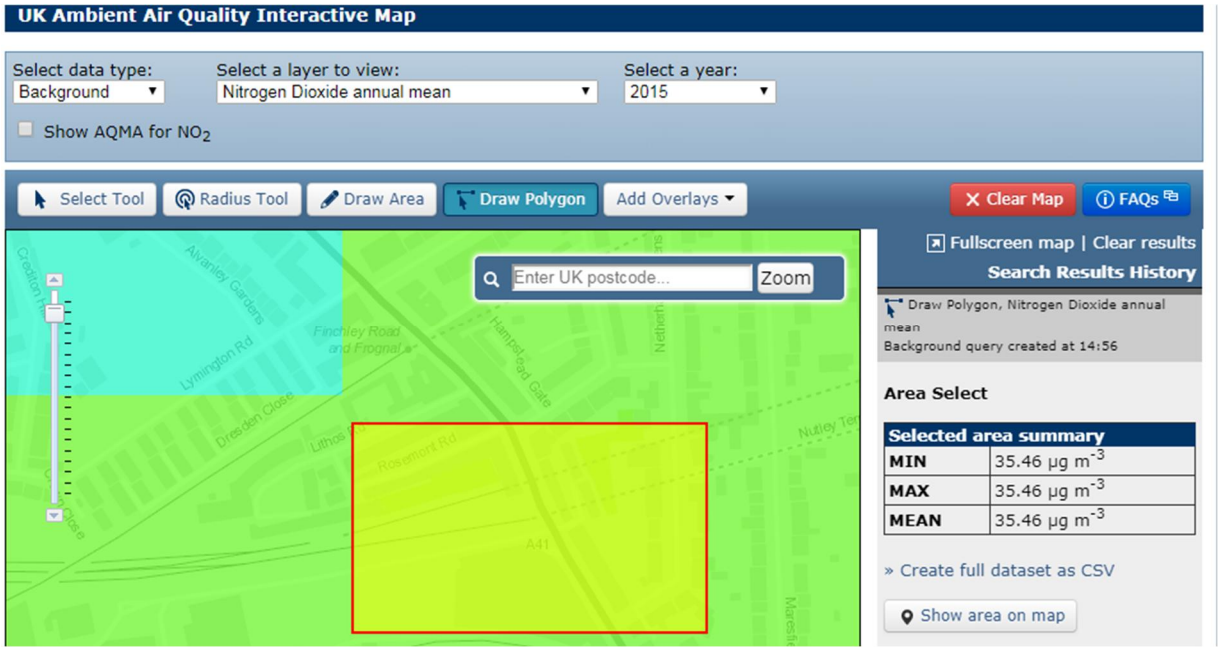


Figure 4-2: Background NO_2 Annual Mean

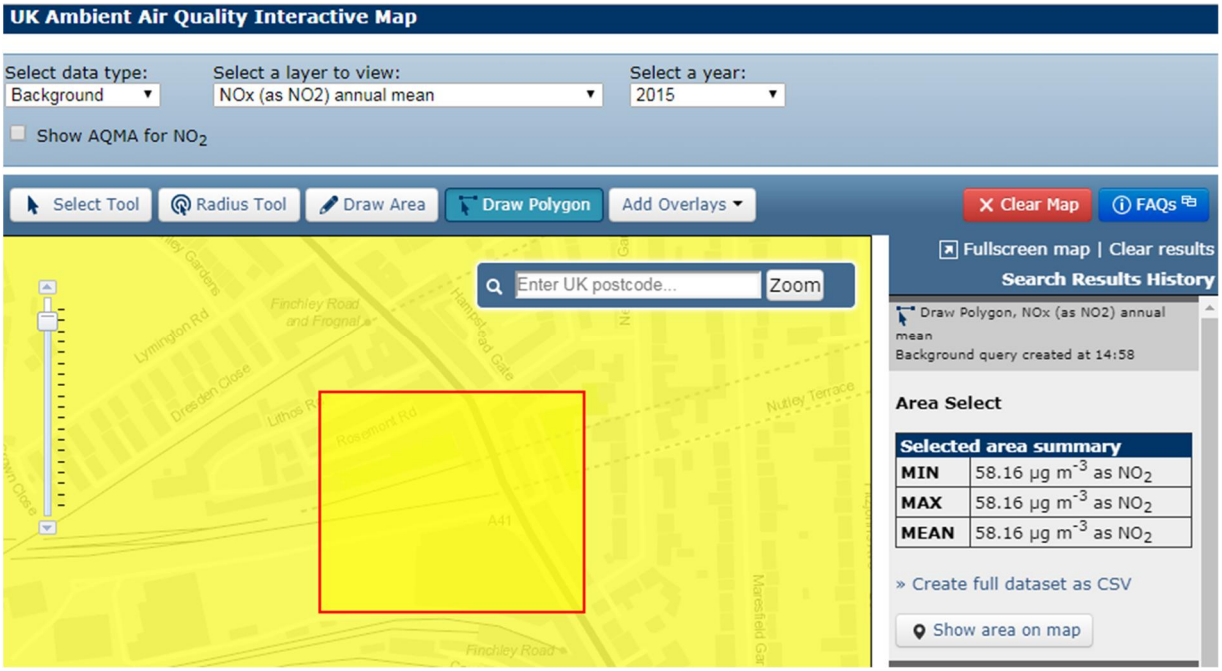


Figure 4-3: Background NO_X Annual Mean

5. MVHR UNIT LOCATION OPTIMISATION

5.0.1 The model was run to predict concentrations at the proposed vents for the ventilation system which are to be located at roof level within the proposed development.

5.0.2 A long section of the proposed building is provided in Appendix C.

5.0.3 The following three locations are where NO_2 concentrations are predicted to be within the UK Air Quality Objective Level.

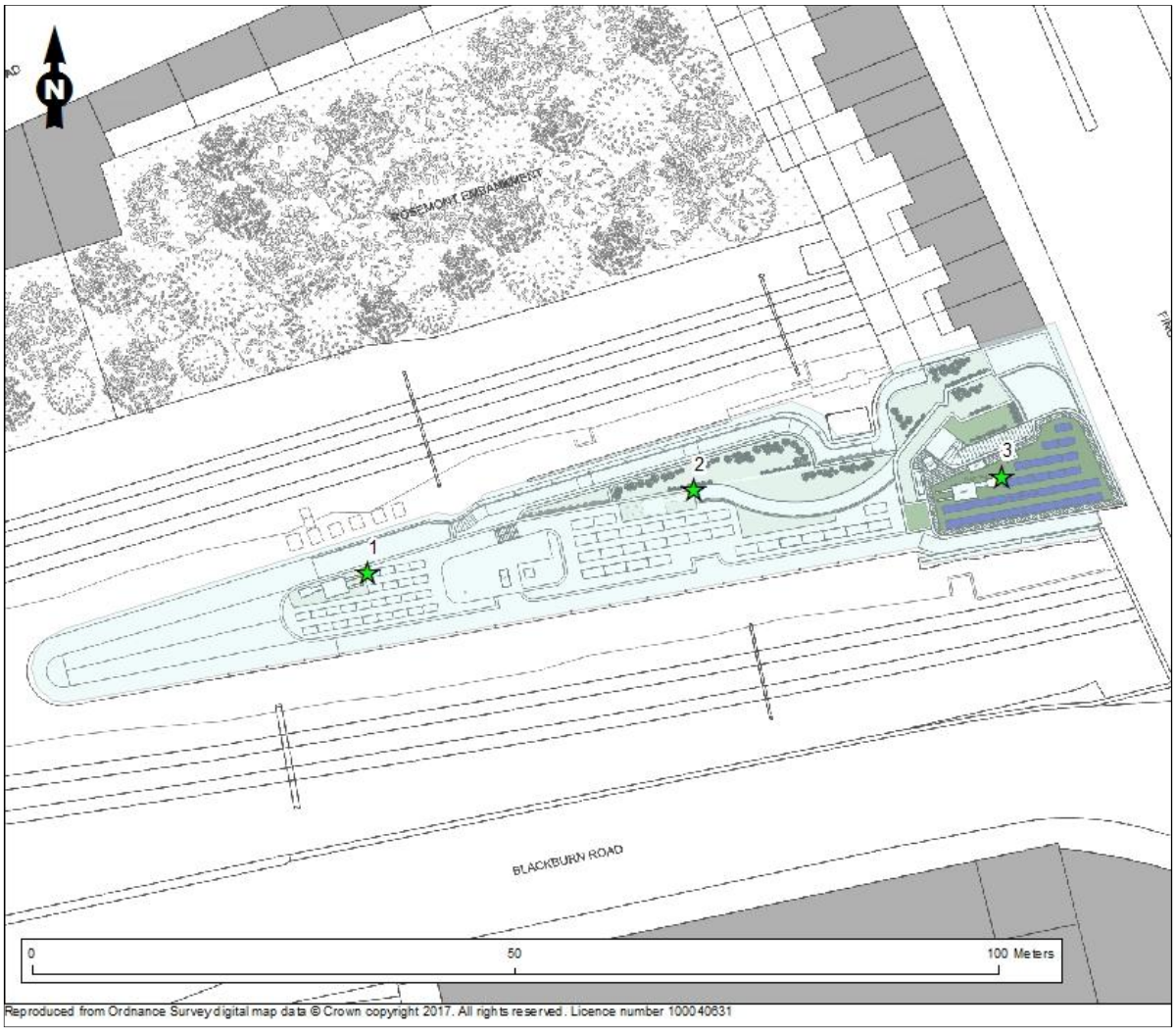


Figure 5-1: MVHR Locations within the UK Air Quality Objective Level for NO_2.

5.0.4 The results of the modelling are provided in Table 5.2 below. Ground level at Finchley Road is 57.2 m AOD.

Table 5.1: ADMS Modelling Results

Location	MVHR Inlet Height	Height in Model with Ground at Zero	Total NO_2 Concentration
1	64.7 m AOD	7.5 m	38.8 µg/m^3
2	66.2 m AOD	9 m	39.9 µg/m^3
3	73.7 m AOD	16.5 m	37.3 µg/m^3

5.0.5 The predicted concentrations at the roof heights where the MVHR Inlets will be positioned are within the UK Air Quality Objective of 40 µg/m^3. As the levels are also below 60 µg/m^3 it is unlikely that the hourly mean would be exceeded at these locations. Therefore, there is no requirement for NO_X filters to be fitted onto the MVHR units.

6. FILTER INFORMATION

6.0.1 KUT submitted a Planning document for the Mechanical and Electrical Services for Midland Crescent at the planning stage[8].

6.0.2 Within this document it is stated that "*Mechanical supply and extract ventilation with heat recovery (MVHR) shall be provided to the student accommodation. The MVHR air handling units shall be located on the roof. Special NOx filters shall be installed in-line with the air intake duct into the MVHR air handling units.*

The ventilation system shall be equivalent to a category Type 4 ventilation system with regards to Part F of the Building Regulations."

6.0.3 At the time of writing no detailed design regarding the mechanical ventilation is complete. However, if NO_X filters are deemed necessary by LBC it is likely that Nitrosorb units will be utilised and information relating to these units are provided in Appendix D.

[8] Planning brief for the mechanical and electrical services at Midland Crescent London NW3, RFB/CMW/6000/9 26th August 2014 - Revision A

APPENDIX A
MODEL VERIFICATION

It is recommended by DEFRA's Technical Guidance (TG.16) that model results are compared with measured data to determine whether the model results need adjusting to more accurately reflect local air quality.

The roadside site Swiss Cottage was used for model verification purposes. Background data from the DEFRA GIS website were used to provide background NO_X and NO_2 concentrations.

The monitored roadside NO_X was derived by using the diffusion tube tab of the NO_X to NO_2 calculator. As the verification year used was 2013, Version 5.1 of the calculator was used.

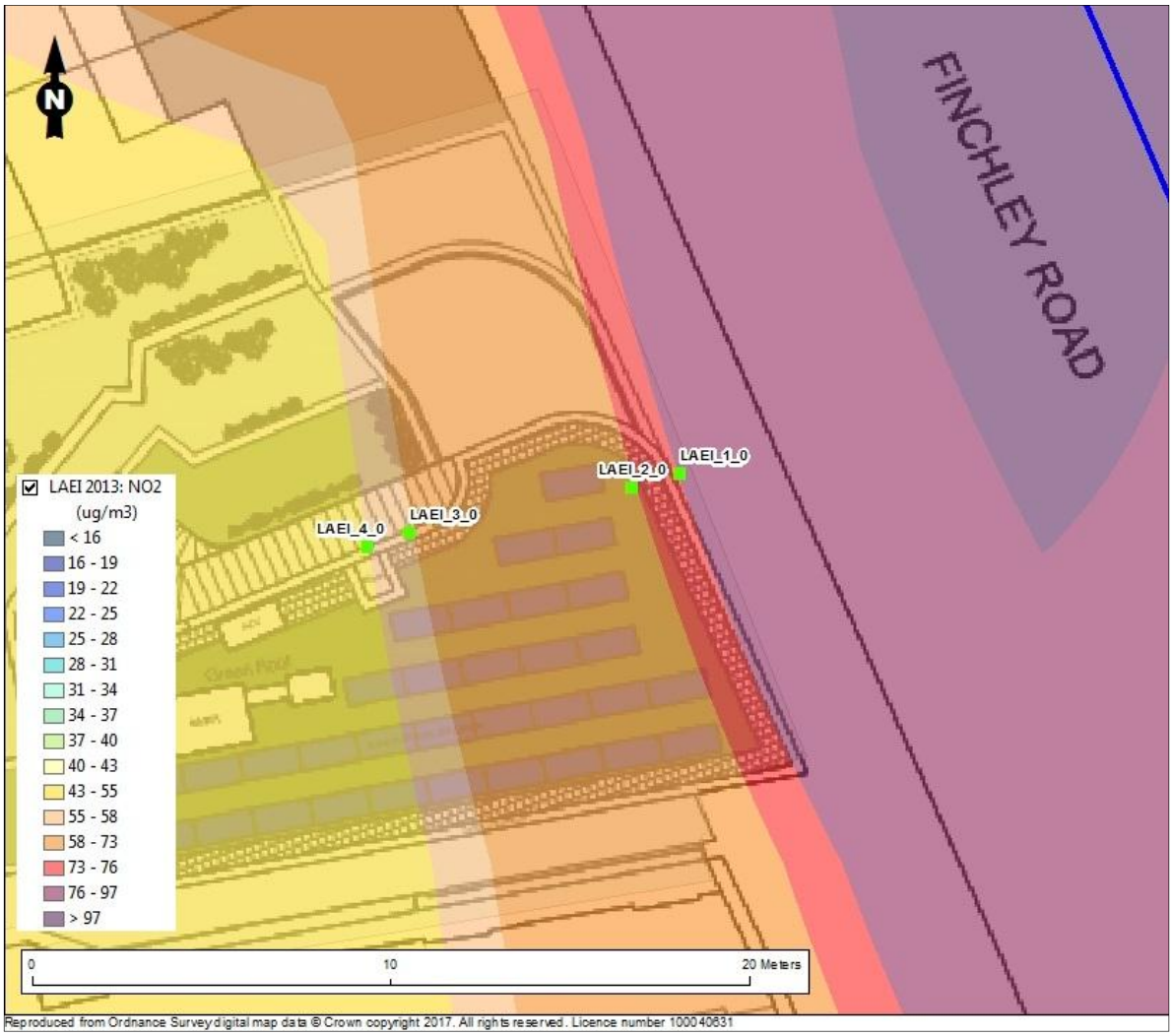
The modelled and monitored roadside NO_X contribution values were compared and a factor was obtained. The modelled roadside NO_X contribution values were adjusted by the corresponding factor. The adjusted modelled roadside NO_X contribution values were converted to roadside NO_2 by using the NO_X to NO_2 Calculator. The modelled roadside NO_2 is then compared to the monitored roadside NO_2 and another factor is obtained. This factor is applied to the corresponding modelled roadside NO_2 value and then a total NO_2 value is obtained by adding the background NO_2.

This is outcome of the verification process is provided below:

Met Data Year	YEAR STATION	London City 2016												
					Site ID	DT / Monitor NO_2 conc µg m^{-3}	Background NOX and NO2 taken from Bloomsbury (UB) 2016		Road NO_X, µg m^{-3}	Total NO_2, µg m^{-3}	Road NO_2, µg m^{-3}			ADMS
	Monitoring data year	2016					NO_X	NO_2						
				CA15	Swiss Cottage CA15	66.00	75.00	42.00	59.21	66	24			18.50

	Monitoring locations	Monitored Total NO_2 (µg/m^3) annual mean	Monitored Total NOx (µg/m^3) annual mean	Monitored B/G NO_2 (µg/m^3)	Monitored B/G NO_x (µg/m^3)	Monitored Road NO_x (µg/m^3)	Modelled Road NO_x (µg/m^3)	Road NOx Verification factor	Adjusted Modelled Road NOx Conc	Monitored Road NO_2	Adjusted Modelled Road NO2	Road NO_2 Verification factor	Adjusted Road NO_2 Conc	Final Total NO_2
1	Swiss Cottage CA15	66.0	134.2	42.0	75.0	59.2	18.5	3.2	59.21	24.00	24.00	1.000	24.0	66.0
		66.0					**Average =**	**3.2**			**Average =**	**1.00**		**66.0**

A comparison of the LAEI map (2013) was also undertaken. The comparison shows that the ADMS model is broadly similar to the LAEI 2013 map. The LAEI map and ADMS model outputs and results are provided below:



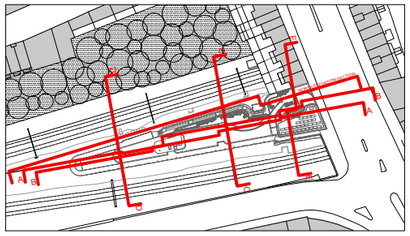
Receptor name	X(m)	Y(m)	Z(m)	Conc|ug/m3|NOx|<All sources>|-| 1hr	NOX VERI FACTOR	ADJ NOX	CONVERT NO2	TOTAL NO2 (+B/G) defra GIS 2015						
										2013		2013	NOX	NO2
LAEI_1_0	526189.9	184890.9	0	21.88	3.2	70.0	26.45	63.5		2013				
LAEI_2_0	526188.6	184890.5	0	20.25	3.2	64.8	24.75	61.8		site area	Defra GIS		56.33	37.07
LAEI_3_0	526182.3	184889.2	0	15.09	3.2	48.3	19.13	56.2						
LAEI_4_0	526181.2	184888.8	0	14.39	3.2	46.0	18.33	55.4						

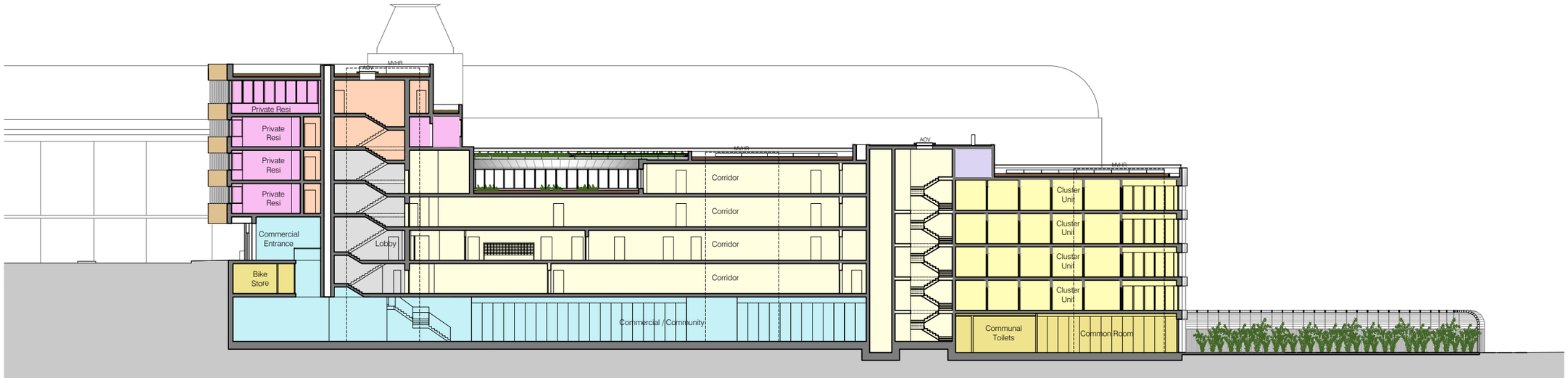
APPENDIX B
TRAFFIC DATA

AADFYear	CP	Estimatio	Estimatio	Region	LocalAuthority	Road	RoadCate	Easting	Northing	StartJunction	EndJuncti	LinkLengt	LinkLengt	PedalCycl	Motorcycl	CarsTaxis	BusesCoa	LightGoo	V2AxleRig	V3AxleRig	V4orSAxle	V3or4Axle	V5AxleArt	V6orMore	AllHGVs	AllMotorVehicles	
2000	16434	Counted	Manual c	London	Camden	A41	TU	526150	185000	Adelaide Rd roundabout	A598	2.5	1.55	300	1370	45998	1324	4989	953	46	75	76	48	32	1230	54911	
2001	16434	Counted	Manual c	London	Camden	A41	PU	526150	185000	Adelaide Rd roundabout	A598	2.5	1.55	218	896	42582	930	5429	701	63	101	74	62	28	1029	50866	
2002	16434	Counted	Manual c	London	Camden	A41	PU	526150	185000	Adelaide Rd roundabout	A598	2.5	1.55	717	1548	44750	1618	4836	753	71	77	49	37	38	1025	53777	
2003	16434	Counted	Manual c	London	Camden	A41	PU	526150	185000	Adelaide Rd roundabout	A598	2.5	1.55	488	2440	42856	1170	4982	856	77	60	40	32	22	1087	52535	
2004	16434	Counted	Manual c	London	Camden	A41	PU	526150	185000	Adelaide Rd roundabout	A598	2.5	1.55	252	1190	48267	1373	3791	1046	140	79	82	47	45	1439	56060	
2005	16434	Counted	Manual c	London	Camden	A41	PU	526150	185000	Adelaide Rd roundabout	A598	2.5	1.55	419	2004	44917	1729	6421	1240	108	145	43	109	64	1709	56780	
2006	16434	Counted	Manual c	London	Camden	A41	PU	526150	185000	Adelaide Rd roundabout	A598	2.5	1.55	1278	3222	42317	2208	6798	1442	141	126	84	112	118	2023	56568	
2007	16434	Counted	Manual c	London	Camden	A41	PU	526150	185000	Adelaide Rd roundabout	A598	2.5	1.55	770	2721	42723	1788	7307	695	159	156	122	93	55	1280	55819	
2008	16434	Counted	Manual c	London	Camden	A41	PU	526150	185000	Adelaide Rd roundabout	A598	2.5	1.55	493	1662	41464	1836	5797	1101	121	202	64	34	25	1547	52306	
2009	16434	Counted	Manual c	London	Camden	A41	PU	526150	185000	Adelaide Rd roundabout	A598	2.5	1.55	610	1923	45941	1719	7103	944	110	102	118	54	39	1367	58053	
2010	16434	Estimate	Estimate	London	Camden	A41	PU	526150	185000	Adelaide Rd roundabout	A598	2.5	1.55	673	1902	45206	1733	6975	986	110	88	132	49	38	1403	57219	
2011	16434	Counted	Manual c	London	Camden	A41	PU	526150	185000	Adelaide Rd roundabout	A598	2.5	1.55	542	1202	43754	2240	5408	811	178	190	47	35	90	1351	53955	
2012	16434	Counted	Manual c	London	Camden	A41	PU	526150	185000	Adelaide Road roundabout	A598	2.5	1.55	308	731	29435	1234	4806	997	98	198	0	16	22	1330	37537	
2013	16434	Counted	Manual c	London	Camden	A41	PU	526150	185000	Adelaide Road roundabout	A598	2.5	1.55	1162	1983	35745	1677	4784	568	122	114	0	26	47	877	45066	2%
2014	16434	Estimate	Estimate	London	Camden	A41	PU	526150	185000	Adelaide Road roundabout	A598	2.5	1.55	1250	2034	36275	1632	4875	500	116	107	0	22	45	791	45606	
2015	16434	Counted	Manual c	London	Camden	A41	PU	526150	185000	Adelaide Road roundabout	A598	2.5	1.55	740	1570	34606	1924	6814	1128	106	224	89	69	88	1704	46617	
2016	16434	Estimate	Estimate	London	Camden	A41	PU	526150	185000	Adelaide Road roundabout	A598	2.5	1.55	863	1839	34844	2125	6217	964	85	201	71	61	87	1469	46495	3%

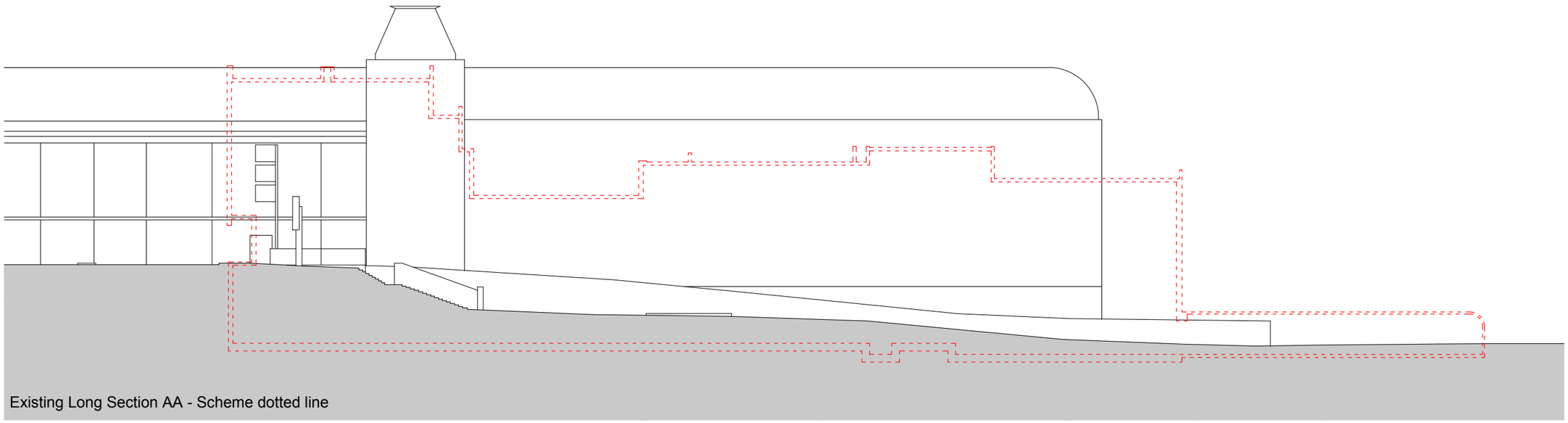
2013	37	1841
2016	61	1876

APPENDIX C
LONG SECTION DRAWING OF PROPOSED BUILDING





Long Section AA - Corridor



Existing Long Section AA - Scheme dotted line

CZWG

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www.czwg.com

Key

- Plant Space
- Student Apartments
- Student Circulation
- Student Services
- Residential Apartments
- Residential Circulation
- Residential Services
- Commercial/ Community
- Commercial Community Circulation
- Commercial/ Community Services
- Green Areas

Rev: P01 **Date:** 26.08.14 **Drn:** BMF **Chk:** BM
Issue for Planning

Do not scale off this drawing
Report all errors and omissions to the Architect
Dimensions to be checked on site

SHEET INFORMATION:

Plotted by : S.TURNER
Plot date : 26 August 2014 14:40:02

Client:
Stadium Capital Holdings

Project:
Midland Crescent

Title:
Long Section AA
Corridor
.
.

Drawing status:
For Planning

CZWG

Scale @ A1
1:200

Drawing No:
2004-00-DR-0401

Rev:
P01

APPENDIX D
FILTER INFORMATION

LEADERS IN AIR & GAS PHASE FILTRATION TECHNOLOGY

AAC Swiftpack® with Nitrosorb® media for - *NO_2 and NOx Removal*

Can you be compliant with the EU CAFÉ DIRECTIVE?

Introduction

Environmental Pollution arising from contaminants such as Nitrogen Dioxide (NO_2) are an increasing issue to the air quality of densely populated city environments.

Problems relating to atmospheric pollution and air quality are major considerations to those involved in major construction programmes in built up areas. Consulting Engineers and Environmental Consultants are under increasing pressure from local authority planning departments to comply and conform with the EU Directive 2008/50/EC (the CAFÉ Directive). European Union Air Quality and Clean Air for Europe 2008 and to implement mitigation measures that are designed to improve the indoor air quality of their new build projects.

NITROSORB™ is an AAC Eurovent dry chemical scrubbing media product, specifically selected for its ability to efficiently remove low concentrations of Nitrogen Dioxide and NOx at levels typically found in atmospheric pollution.

The **AAC Swiftpack®** with Nitrosorb® media provides the ideal solution as a mitigation measure accepted by Local Authority Planners in meeting stringent NO_2levels in designated Air Quality management Areas (AQMA).

The **AAC Swiftpack®** is an effective means of reducing high NO_2 levels down to the accepted level of 40ug/m3 as a mean annual concentration level. This system has been independently performance tested with extremely good results offering low pressure drops enabling them to be used effectively with Mechanical Ventilation Heat Recovery Units (MVHR'S).

In addition the units are installed with the Patented and unique AAC COLOURCELL® MEDIA FILTER SYSTEM

The **AAC Colourcell®** media filter system provides a visual indication of the condition of media installed. It enables operatives and end users to easily determine when the media needs to be replaced simply by the colour change.

Features

- Unique **NITROSORB®** media with **AAC Colourcell®** visual condition indication
- Low pressure drop
- Long lifespan of media typically 2-5 years
- Low cost
- Optional PM10 filter can be installed into the unit

Benefits

- Accepted by planners as an acceptable AQMA NO_2 mitigation measure
- Compact size designed to enable installation into small spaces with bespoke designs.
- Independently tested
- Compatible with mechanical ventilation Heat Recovery (MVHR) Units
- Low running cost

The AAC **NITROSORB®** Filter cells can also be installed into Centralised Air Heating Plant by means of the **AAC Swiftkit®** & the AAC skeleton frame products.

Major Developers and House Builders are specifying the **AAC Swiftpack®**/Nitrosorb® media filter system as their preferred NO_2 Mitigation solution.

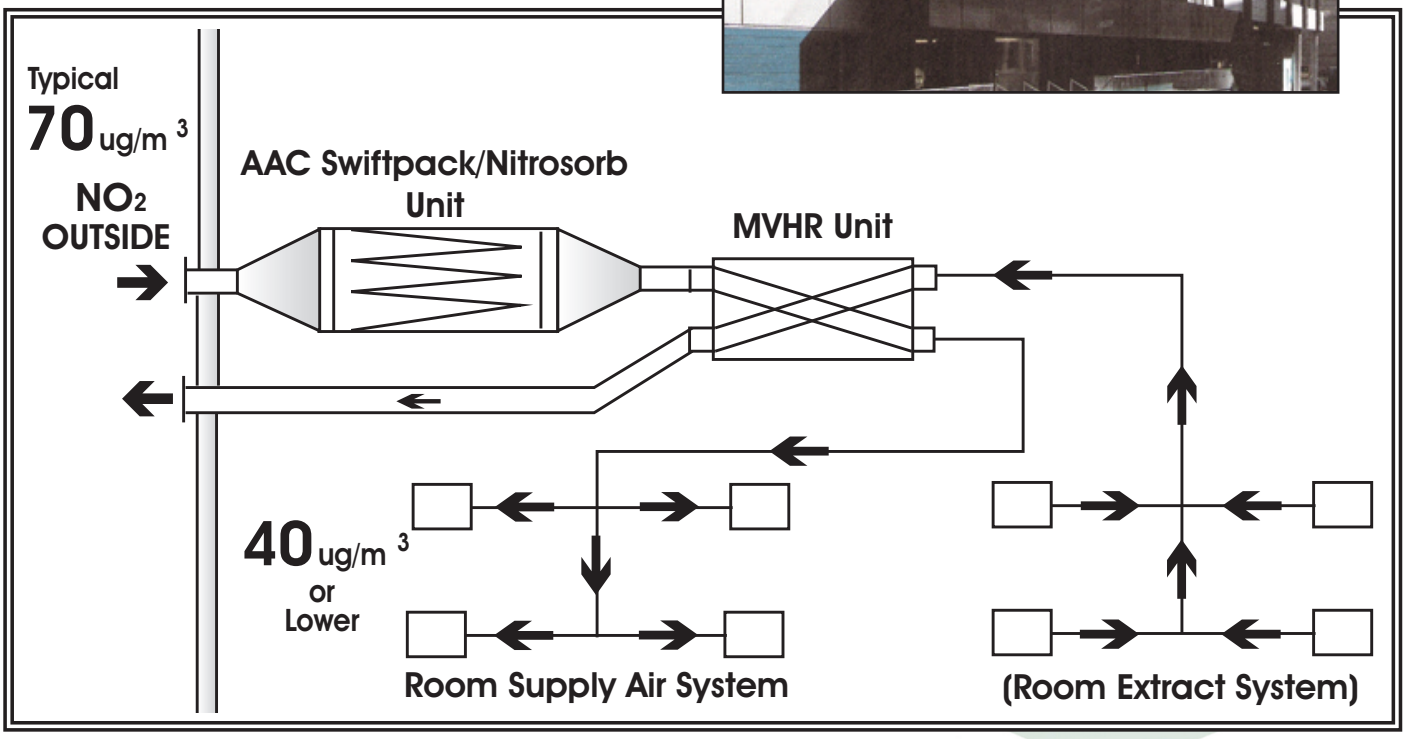
Address: AAC Eurovent Ltd, AAC House, Unit K Maybrook Industrial Estate, Maybrook Road, Brownhills, West Midlands WS8 7DG. UK.
Tel: 08444 77 4884 **Fax:** 0844 77 4797 **International Callers Tel:** +44 (0) 1543 379823
Email: sales@aaceurovent.co.uk **Website:** www.aaceurovent.co.uk

LEADERS IN AIR & GAS PHASE FILTRATION TECHNOLOGY

NO_2 MITIGATION IN AQMA'S

Meets planners requirements in complying with **EU Directive 2008/50/EC** in mitigating high NO_2 levels in air quality management as (AQMA'S)

NO_2 AND NO_X REMOVAL



To find out more about the role of the AAC range of products & **NITROSORB**™ media in air quality control, call **08444 77 4884**

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