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25 July 2019

Caroline Keane
Gerald Eve LLP
72 Welbeck Street
London
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Our ref: PB/8479A/NJ

Dear Caroline:

115 – 119 Camden High Street – Response to Camden Council (Air Quality)

This letter provides a response to comments provided by the London Borough of Camden Senior Sustainability Officer (SSO) (Planning), Katherine Frost (email dated 19th July 2019) on the above development proposal.

The following responses to specific comments from the SSO are as follows:

1) Operational Impact on Occupants:

SSO: CPG Air Quality section 3.5 states that “Modelling should not predict improvements to future years (future vehicle emissions or future background concentrations).” As the figures in table 6.2 are predicted to 2021 these are not considered the ‘worst case’. The baseline figures in (table) 6.1 indicate considerable exceedances and therefore the proposed mitigation is not considered to be sufficient.

Response:

The air quality assessment for 115 – 119 Camden High St, followed LB Camden and Defra guidance in assessing air quality and providing mitigation recommendations for new receptors being introduced through the development.

- The baseline year data set out in Table 6.1 provides a 2017 assessment however this is an ultra-conservative assessment of 2021 exposure concentrations as it does not consider the introduction of the London ULEZ, national fleet emissions improvements or UK background concentration improvements due to UK and EU policy changes.
- With regard to the residential façade exposure (at receptor 10 only), based on the ultra-conservative 2017 (Table 6.1) results;
 - o First floor results (F10) are above the (EU/UK/WHO) air quality standards (AQS) for NO₂; and

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- Second floor results (S10) is only marginally above the AQS.

The location of receptor 10 was modelled at various floor level heights along the main building line on Delancey St. The location of the habitable space for the residential apartments is actually set-back a further 3m from the pollution source, this will likely result in a drop-off in NO₂ concentrations at all levels. It is therefore likely that concentrations above the 1st floor level will be compliant with regard to the NO₂ AQS.

As recommended (report section 6.41) "the proposed development could consider installing a system of mechanical ventilation (to reduce the need to open windows for purge ventilation" - this is reasonable mitigation considering the ultra-conservative 2017 assessment and should only apply to residential facades on the 1st floor.

The proposed mitigation for the hotel are reasonable as window units for the façade rooms will have non-openable windows and air is to be drawn from the top or rear of the building.

2) Construction impacts

SSO: Construction related impacts - Mitigation:

Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.

Response:

An assessment of potential impacts during the demolition and construction phases has been undertaken and included in the air quality assessment. The risk was assessed as being a Medium Risk following the IAQM Construction Dust Guidance (*Guidance on the assessment of dust from demolition and construction (2014)*). Recommended mitigations have been included and follow the IAQM guidance for "Recommended Mitigation Measures for sites with a Medium Risk of Dust Impacts".

A CMP will be prepared and the checklist completed to demonstrate that all mitigation measures relevant to the level of identified risk are being included.

SSO: Construction related impacts - Monitoring:

Air quality monitoring should be implemented on site. No development shall take place until:



- a) *prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they have been installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;*
- b) *prior to commencement, evidence has been submitted demonstrating that the monitors have been in place for at least 3 months prior to the proposed implementation date.*

The monitors shall be retained and maintained on site for the duration of the development in accordance with the details thus approved.

Response:

Monitoring will be undertaken following IAQM guidance (*Guidance on Monitoring in the Vicinity of Demolition and Construction Sites (2018)*), GLA guidance (*Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance (2014)*) and the "Recommended Mitigation Measures for sites with a Medium Risk of Dust Impacts", set-out as follows:

- Carry out regular site inspections to monitor compliance with the Dust Management Plan (or referenced CMP), record inspection results, and make an inspection log available to the local authority when asked.
- Increase the frequency of 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 real-time PM10 continuous monitoring locations with the Local Authority. Where possible commence baseline monitoring at least three months before work commences on site or, if it is a large site, before work on a phase commences. Further guidance is provided by the IAQM on monitoring during demolition, earthworks and construction.

As specified in the SSOs request the air quality monitoring will adhere to points a) and b).

Please do not hesitate to contact me for further clarifications.



Yours sincerely

A handwritten signature in black ink, appearing to read "Nigel Jenkins". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Nigel Jenkins
Principal Environmental Consultant

Encs.