MILLER GOODALL
ACOUSTICS - AIR QUALITY - LIGHTING

REVIEW OF NIA & ES CHAPTER

on behalf of

Kentish Town Neighbourhood Forum

for

Land at Regis Road, Camden Quarter, London NW5 3EW

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Miller Goodall Ltd
Ashworth House
Deakins Business Park
Egerton
Bolton
Lancashire BL7 9RP
Tel: 01204 596166

www.millergoodall.co.uk

Company registration number 05201673

Original Author:	Nicola Stedman MIOA Principal Consultant BSc (Hons), PG Dip, MSc	**Reviewed By:**	Lise W. Tjellesen MIOA Technical Director MSc Eng
Signed:		**Signed:**	
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Advisory Note

The suitability of any recommended noise mitigation measures within this report should be approved by the relevant architects, structural engineers, building contractors, fire consultants and material manufacturers constituting the wider design team, prior to procurement and field application. This should ensure that when the recommended noise control measures are implemented on site, they will satisfy the requirements of all disciplines and not cause any health and safety issues.

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1 Introduction

1.1 Miller Goodall Ltd has been instructed to undertake a high-level review of the Noise Impact Assessment (NIA) and Chapter 10: Noise and Vibration of the Environmental Statement (ES) submitted to support the full planning application for development at Land at Regis Road, Camden Quarter, London NW5 3EW. The development site is located within the local authority of the London Borough of Camden (LBC).

1.2 The NIA has been prepared by Atelier Ten, and Chapter 10: Noise and Vibration of the ES has been prepared by Trium.

2 Planning Application

2.1 Planning Application 2025/4861/P is for the:

> *"Demolition of existing structures (including part of the listed police station building) and phased redevelopment [of up to 24 storeys (residential equivalent) with basement levels] to include residential development (Class C3), commercial, business and service uses (Class E), film production uses (Sui Generis), education uses (Class F1), visitor accommodation (Class C1), reprovided recycling facility (Sui Generis), local community uses (Class F2), cinema (Sui Generis), drinking establishment (Sui Generis), and studio experience / museum (Sui Generis) together with supporting infrastructure including new and upgraded routes; landscaping, public realm and highway works; energy centre and plant installation; cycle parking and disabled car parking."*

3 Review of NIA

3.1 The following document has been reviewed:

- 'Noise Impact Assessment' prepared by Atelier Ten, revision 3, dated October 2025 (uploaded onto the Camden Council Planning portal on 04 November 2025 16:21:53 and downloaded from the Camden Council Planning Portal on 03 March 2026).

3.2 The following supporting documents have been considered but not formally reviewed:

- ‘Master Plan - Existing Location Plan’ prepared by SPPARC, revision P01, dated 27 October 2025 (uploaded onto the Camden Council Planning portal on 28 October 2025 18:06:47 and downloaded from the Camden Council Planning Portal on 03 March 2026).
- ‘Master Plan – Proposed Site Plan’ prepared by SPPARC, revision P01, dated 27 October 2025 (uploaded onto the Camden Council Planning portal on 28 October 2025 18:06:47 and downloaded from the Camden Council Planning Portal on 03 March 2026).

3.3 Please note that it is not possible to check the modelling/assessments/calculations as this information is not available.

3.4 Policy

3.5 Section 2.1 of the NIA refers to ‘Planning Practice Guidance’, dated 2019; however, the latest version is dated November 2024.

3.6 Section 2.1 of the NIA refers to ‘Association of Noise Consultants, Acoustics Ventilation and Overheating Residential Design Guide’, dated 2017; however, the latest version is dated January 2020. Nevertheless, the document is now obsolete, as it has been superseded by ‘Approved Document O: Noise Guide’, dated 2024, which should be read in conjunction with ‘Approved Document O: Overheating’, dated 2022.

3.7 Baseline Monitoring

3.7.1 School Holidays

3.7.2 St. Patrick's Catholic Primary School is located on Holmes Road, and several student halls of residence are also located in the immediate area.

3.7.3 Section 3.0 of the NIA states that the environmental noise and vibration surveys were undertaken between 13 August and 03 September 2025, which falls within the school holidays.

3.7.4 Clarification should be provided to justify:

- why the surveys were carried out during the school holidays;
- why the data is considered to be representative; and
- how the noise levels may vary between the school holidays and the school term time.

3.7.5 Survey Locations

3.7.6 Long-term attended measurements were undertaken at four locations in and around the site to capture ambient and maximum noise levels. However, no long-term measurements were undertaken on Holmes Road, representative of 20-22 Holmes Road or St. Patrick's Catholic Primary School. These existing noise-sensitive receptors are the closest to the proposed building, referred to as 'Station House', which will include residential units and the relocated recycling centre.

3.7.7 Short-term attended measurements were undertaken at five locations in and around the site to capture ambient and maximum noise levels. The measurements were only carried out during the daytime period, between the hours of 07:00 and 23:00. No short-term attended measurements were carried out during the night-time period between the hours of 23:00 and 07:00. In addition, there is no indication of the date of the survey, the time of the survey, the duration of the survey, or the measurement time interval. The absence of this information raises a question over the validity of the survey data and whether it is considered to be representative.

3.7.8 Survey Information

3.7.9 The NIA does not include important information about the survey, such as:

- The distance from the measurement location to the main sound/vibration source.
- The topography of the intervening ground between the measurement location and the main sound/vibration source.
- The type of intervening ground between the measurement location and the main sound/vibration source.
- The presence of any reflecting surfaces other than the ground.
- Whether the microphone was in façade or free-field conditions.
- The height of the microphone above absolute ground level.
- Photographs of the survey installation.
- A justification for the choice of measurement location.
- Details of the sound/vibration measuring systems, including calibrator or pistonphone used, including:
    - type and/or model;
    - manufacturer;
    - serial number; and

    - details of the latest verification test, including dates.
- Calibration levels, including:
    - reference level of calibrator, multi-function calibrator or pistonphone; and
    - calibration level of the meter before and after measurements with a calibrator, multi-function calibrator or pistonphone.
- Weather conditions, including:
    - wind speed and direction;
    - presence of conditions likely to lead to temperature inversions (e.g. calm nights with little cloud cover);
    - preparation;
    - fog;
    - wet ground;
    - temperature; and
    - cloud cover.
- Date and time of measurement.
- Measurement time interval.
- Measurement duration.
- Measurement metrics (e.g. L_{Aeq}, L_{A10}, L_{A90}, L_{AMax}, etc.).
- Measurement spectrum (e.g. broadband, octaves, third octaves, etc.).
- Measurement uncertainty.

3.7.10 The absence of this information raises a question over the validity of the survey data and whether it is considered to be representative.

3.8 Assessment

3.8.1 Vibration Analysis

3.8.2 Clarification should be provided on which of the axis's have been used for the calculations or if all three have been used to derive the reradiated noise.

3.8.3 Façade Assessment – Residential Dwellings

3.8.4 Long-term measurements were undertaken for a minimum duration of one full week, including a weekend, logging in 15-minute intervals. Fifteen-minutes is not a suitable time interval for calculating the maximum level to demonstrate compliance with 'Approved

Document O: Overheating'. Paragraph 4.3.2.7 of the document states that a sample rate of 2-minutes should be used, as detailed below.

> 4.3.2.7. When measuring data for comparison against the L_{AFmax} criterion, an appropriate sampling period is required. Studies [Ref. 12 and Ref. 13] indicate that a measurement sampling time between 1-minute and 3-minutes relates most closely to awakening events compared with longer sampling periods. It is recommended that a sample rate of 2-minutes is used. A longer sampling period can result in a lower assessment of the 10^{th} highest maximum level, and therefore should not be used. A shorter sampling period is acceptable with suitable post-processing of the data.

3.8.5 Recycling Centre

3.8.6 The recycling centre will be relocated approximately 175 m from the northern end of Regis Road to the southern end of Regis Road, in a building referred to as 'Station House'. Station House will also incorporate 28 residential units.

3.8.7 The existing recycling centre is currently open-air, with the existing entrance located approximately 140 m from 20-22 Holmes Road (at the nearest point).

3.8.8 The proposed recycling centre will be located within the ground floor of the 'Station House' building, with the proposed entrance approximately 40 m from 20-22 Holmes Road (at the nearest point).

3.8.9 Section 7.3.1 of the NIA refers to the "daytime operation of the recycling centre". However, the report does not specify the proposed recycling centre's operating hours or whether the facility will operate 7-days a week.

3.8.10 Section 7.3.1 of the NIA indicates that activities within the recycling centre are likely to have a sound pressure level of up to 92 dB(A) at 10 m from the skip, with an instantaneous max of up to 102 dB at 10 m from the skip, and predicted worst-case maximum noise levels of up to 89 dB(A) at the entrance/exit of the recycling centre. These levels are considered high, and although the report indicates that acceptable levels can be achieved within the residential units above with suitable mitigation, there is concern that the derived sound insulation is not sufficient.

3.8.11 Further information should be required on the sound transfer between the proposed recycling centre and the residential units above, with clarification on how the sound insulation has been derived.

3.8.12 Section 7.3.1 of the NIA indicates that the predicted worst-case maximum noise level is likely to be 62 dB(A) at the nearest façade at 20-22 Holmes Road. The assessment then goes on

to explain that because the maximum measured levels are already up to 82 dB(A) at night, the impact is considered to be very low and "should not be disturbing to existing residents". However, there is no discussion of context and whether the existing events contributing to the maximum are comparable with the proposed events. For example, the maximum level and spectral content from a vehicle pass-by is different to the maximum level and spectral content from activities associated with a recycling facility.

3.8.13 Noise from waste facilities, including recycling facilities, should be assessed following the methodology in British Standard 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound' to determine the likelihood of complaints. The NIA does not include an assessment of the recycling facility in accordance with the Standard. This assessment should be undertaken prior to the application being determined.

3.8.14 Film Studio

3.8.15 In principle, the 'box-in-box' approach is a valid and well-known way of building studios. The theory of securing internal ambient noise levels by controlling the noise break-in should technically address the issue of noise break-out. However, the proposed NR 25 for internal ambient noise levels is unlikely to be acceptable for a film studio, and thus, the predicted sound insulation required to achieve that is unlikely to be sufficient. Further clarification should be provided, including assumptions for the calculations.

3.8.16 With the proposed NR 25, a sound insulation performance of D_w 60 dB is predicted to satisfy Camden Council's requirements for L_{AFmax} events. However, there is concern that the derived sound insulation is not sufficient based on the information provided in the NIA, especially if shooting and pyrotechnics activities are required to take place within any of the film studios, and especially if these types of activities are likely to take place simultaneously in several of the studios.

3.8.17 Section 8.2.1 of the NIA states:

> "Film studios have the capacity to generate high levels of noise during their operation, for example during shooting scenes involving pyrotechnics. It is also possible that shooting may occur overnight." .
>
> *"As can be seen, the studio would have to generate A-weighted levels in excess of 120 dB in order that the limit set by Camden Council was exceeded at the nearest*

NSRs. This is an extremely high level of noise, comparable to an aircraft take-off or thunderclap (distance dependent) and considered highly unlikely to be exceeded internally."

3.8.18 If shooting and pyrotechnics are required, especially at night, the assessment should be updated to reflect this and the sound insulation specified to allow for a 'worst-case'. This should be addressed prior to the application being determined.

3.8.19 Plant Noise

3.8.20 At this stage in the planning process, the exact make, model, number, and location of plant associated with the proposed development have yet to be specified. On this basis, limiting plant noise rating levels have been provided in section 10.2 of the NIA, which is standard practice. However, it is not clear if the limits stated apply to the site as a whole or to each element/phase. If it applies to each element/phase, then the overall rating level will exceed 10 dB below background due to 'noise creep'. If it applies to the site as a whole, then the limit will need to be calculated for each element/phase to ensure that the cumulative level is within the limits.

3.8.21 It is likely that there will be a significant amount of plant associated with the recycling centre, the energy centre, residential units, and the film studios. Therefore, the assessment should demonstrate that plant associated with the proposed development can meet the criteria prior to the application being determined.

3.8.22Road Traffic Noise Assessment

3.8.23 The NIA does not include an assessment of road traffic noise associated with the proposed development on existing noise-sensitive receptors. However, this is included in the ES Chapter (see comments in section 4.9.9).

4 Review of ES Chapter 10: Noise and Vibration

4.1 The following document has been reviewed:

- 'Camden Film Quarter Environmental Statement: Volume 1 Chapter 10: Noise and Vibration', prepared by Trium, (uploaded onto the Camden Council Planning portal on

04 November 2025 15:23:50 and downloaded from the Camden Council Planning Portal on 10 March 2026).

4.2 The following supporting document has been considered but not formally reviewed, as it only contains standard policy wording, the NIA (see comments in section 3), and the demolition and construction plant assumptions:

- 'Camden Film Quarter Environmental Statement: Volume 3 Technical Appendices. Appendix: Noise and Vibration', prepared by Trium, (uploaded onto the Camden Council Planning portal on 04 November 2025 15:28:56 and downloaded from the Camden Council Planning Portal on 10 March 2026).

4.3 Please note that it is not possible to check the modelling/assessments/calculations as this information is not available.

4.4 Baseline Monitoring

4.5 The ES Chapter refers to the NIA, so the same comments in section 3.7 apply.

4.6 It appears that the survey data have been reprocessed, as the numbers presented in the ES Chapter don't fully correspond to the numbers presented in the NIA. For example, for Position A3, the NIA reports the ambient sound level as 60 dB $L_{Aeq,15min}$, but the ES Chapter reports the ambient sound level as 70 dB $L_{Aeq,15min}$ and for Position A5, the NIA reports the ambient sound level as 58 dB $L_{Aeq,15min}$, but the ES Chapter reports the ambient sound level as 65 dB $L_{Aeq,15min}$.

4.7 There is also a 1 dB difference between some of the long-term background sound levels reported in the NIA and the ES Chapter; however, this could be due to differences in rounding.

4.8 Demolition and Construction

4.8.1 For noise, a 'major adverse impact' is predicted at 20-22 Holmes Road; this is considered significant in EIA terms.

4.8.2 For vibration, a 'moderate adverse impact' is predicted at 20-22 Holmes Road; this is considered significant in EIA terms.

4.8.3 For traffic, a 'negligible impact' is predicted at 20-22 Holmes Road; this is not considered significant in EIA terms.

4.8.4 Although the construction phase is only temporary, it will still last for a number of years (the first phase has an estimated start year of 2027, and the last phase has an estimated start year of 2031), resulting in a significant impact at 20-22 Holmes Road over a prolonged period. Although a number of standard mitigation measures are proposed, significant impacts are likely to occur at the nearest noise-sensitive receptors due to their proximity. On this basis, continuous noise and vibration monitoring should be undertaken for the duration of the demolition and construction phase, and the eligibility for noise insulation and/or temporary re-housing may need to be considered in more detail, in accordance with Section E.4 of British Standard 5225: 2024+A1:2019 'Code of practice for noise and vibration control on construction and open sites – Part 1: Noise'.

4.8.5 Section E.4 of British Standard 5225: 2024+A1:2019 provides examples of thresholds used to determine the eligibility for noise insulation and temporary rehousing, which may need to be considered if the contractor has applied best practicable means to the provision of mitigation (i.e. all reasonable measures have been taken to reduce the noise levels), but levels are still such that widespread community disturbance or interference with activities or sleep is likely to occur. It applies when construction activities are likely to continue for a significant period of time, either continuously or sporadically.

4.9 Completed Development

4.9.1 Recycling Centre

4.9.2 The same comments in section 3.8.5 apply.

4.9.3 For the recycling centre, a 'minor adverse impact' is predicted at 20-22 Holmes Road; this is not considered significant in EIA terms. However, the ES Chapter comments that activity from the recycling centre may be "occasionally audible but not disturbing".

4.9.4 As previously highlighted, a full noise assessment should be undertaken in accordance with British Standard 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound' to determine the likelihood of complaints, prior to the application being determined.

4.9.5 Plant Noise

4.9.6 The same comments in section 3.8.19 apply.

4.9.7 The plant noise limits presented in the ES Chapter don't fully correspond with the numbers presented in the NIA. For example, the NIA states that the plant noise limit is 43 dB during the day and 31 dB during the night, but the ES Chapter states that the plant noise limit ranges between 33 and 40 dB during the day and between 31 and 35 dB during the night, with the lower night-time noise limit of 31 dB at all noise-sensitive receptors except those on Holmes Road, which has a higher noise limit of 35 dB.

4.9.8 There is no justification as to why the plant noise limits vary between the two documents or why a higher level is considered appropriate when no baseline sound survey was undertaken at 20-22 Holmes Road.

4.9.9 Road Traffic Noise Change Assessment

4.9.10 Although there will be no parking provided for the residential element of the proposed development, it is likely that there will be traffic associated with the proposed film studio, energy centre, and recycling centre, with a potential for deliveries to take place early in the morning or late at night.

4.9.11 The ES Chapter refers to Calculation of Road Traffic Noise (CRTN), the Design Manual for Roads and Bridges (DMRB) LA 111 Noise and Vibration, The Institute of Environmental Management and Assessment (IEMA) 'Guidelines for Environmental Noise Impact Assessment', and IMEA Guidance Note No.1 'Environmental Assessment of Traffic and Movement.

4.9.12 DMRB LA 111 sets out the requirements for assessing and reporting the effects of highways noise and vibration from construction, operation, and maintenance projects, in the absence of any specific guidance, it is standard practice to adopt this approach.

4.9.13 The construction road traffic noise change assessment and the operational road traffic noise change assessment both use the same assessment year (2029). There is no justification as to why the same assessment year has been used, especially when the first construction phase is estimated to start in 2027, and the last construction phase is estimated to start in 2031. It is standard practice to consider the base year, construction year, opening year (the first year of operation, when the site is fully occupied), and future year (the 15th year after the year of opening).

4.9.14 Cumulative construction and operational road traffic noise change assessments have not been undertaken because traffic data associated with the other committed development is not available at this stage. It is therefore recommended that if planning is granted, a suitably worded noise condition is included requiring the assessments to be undertaken prior to demolition and construction works taking place.

4.9.15 It is important to note that the traffic data used in the road traffic noise change assessments should be consistent with the traffic data used in the Traffic Assessment / Transport ES Chapter. If there are any issues with the validity of the traffic data, this may affect the outcome of the road traffic noise change assessments.

5 Summary and Conclusion

5.1 Miller Goodall Ltd has been instructed to undertake a high-level review of NIA and Chapter 10: Noise and Vibration of the ES, submitted to support the full planning application for development at Land at Regis Road, Camden Quarter, London NW5 3EW.

5.2 The review has highlighted a number of concerns, which are summarised below.

- The surveys were carried out during the school holidays.
- No long-term surveys were carried out at the nearest existing noise-sensitive receptors to 'Station House' and the proposed recycling centre (e.g. 20-22 Holmes Road).
- No survey details have been provided (e.g. instrumentation, weather, set-up, etc.).
- No discussion of survey uncertainty has been provided.
- There is a discrepancy between some of the baseline values presented in the NIA and the ES Chapter.
- There is concern that even with standard mitigation measures, noise and vibration during the demolition and construction phase are likely to be significant.
- No details of the recycling centre operating hours have been provided.
- No operational assessment of the proposed recycling centre has been undertaken in accordance with BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound'.
- There is concern that the required sound insulation for the residential units above the recycling centre is not sufficient.
- There is concern that the required sound insulation for the recycling centre and the film studio (including associated plant) is not sufficient.

- There is a discrepancy between some of the plant noise limits presented in the NIA and the ES Chapter.
- There is concern that the plant noise limits will not prevent 'noise creep'.
- There is concern that the road traffic noise change assessments use the same assessment year.
- Any issues with the validity of the traffic data may affect the outcome of the road traffic noise change assessments.


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