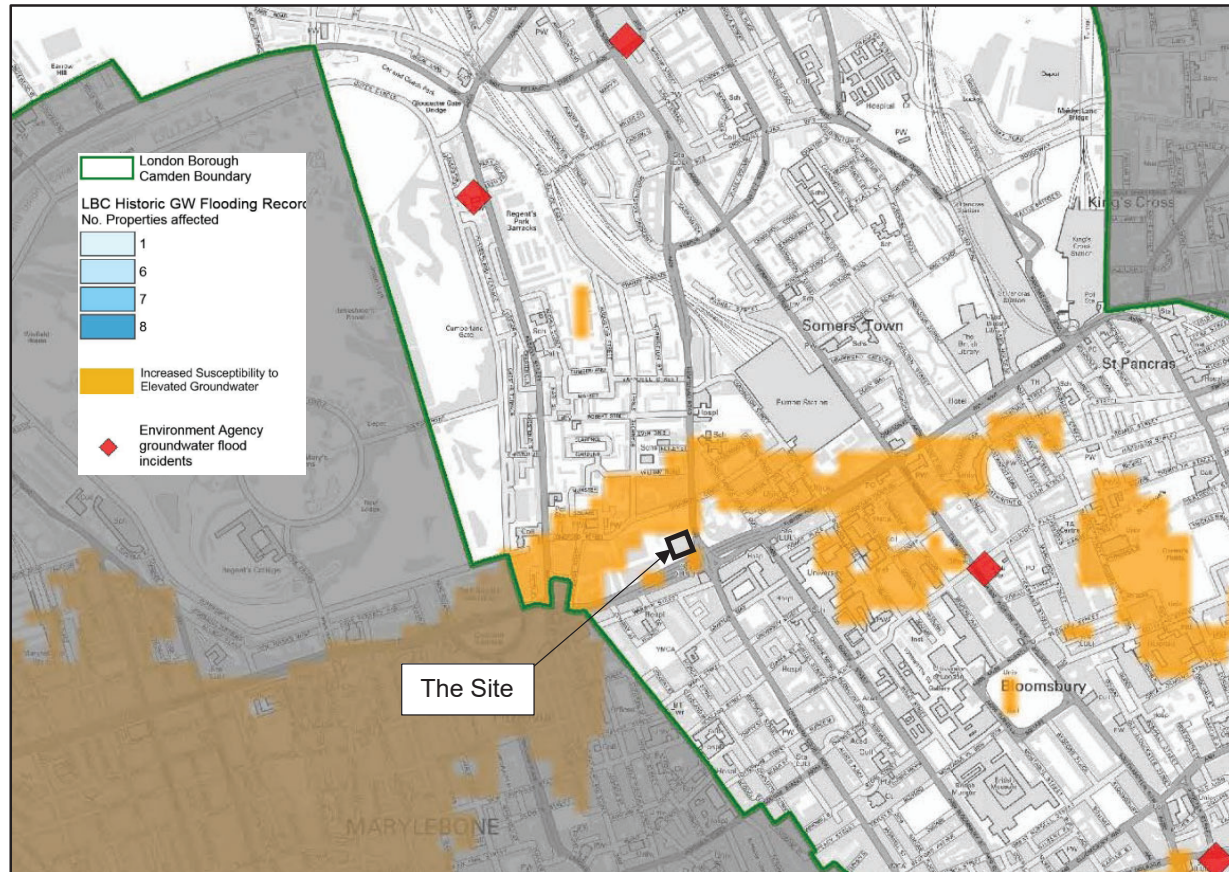




- 8 According to the LBC SFRA, though the site itself does not have increased susceptibility to elevated groundwater, there are areas in close proximity that do, notably to the north (see Figure 5). It is worth acknowledging that there are no historic records of groundwater flooding of properties in the vicinity of the site, the nearest incident being recorded approximately 800m away in Bloomsbury. Ground Investigation data will be reviewed to establish the groundwater level on the site as part of the site-specific FRA.

Figure 5 Map of Increased Susceptibility to Elevated Groundwater (LBC, 2014)



- 9 According to the LBC SFRA, the site is underlain by the London Clay Formation, which is a non-aquifer or unproductive strata – i.e. bedrock with low permeability that has negligible significance for water supply or river base flow. Furthermore, the LBC SFRA does not identify the site as being located within a Groundwater Source Protection Zone (GSPZ), i.e. an area where there are likely to be risks posed to quality and/or quantity of groundwater abstracted.

Sewerage and Water Supply Infrastructure

- 10 The existing site and its environs are heavily urbanised. The Thames Water Utilities Limited (TWUL) asset records show that the site and the surrounding area is currently served by a network of public combined water sewers. The asset records indicate that the existing sewer network consists of primarily strategic combined sewers, with a 1372X864mm trunk combined sewer that runs northwards along Hampstead Road directly east of the site, and a 1143X762mm trunk combined sewer that runs eastwards along Euston Road directly south of the site. There are no dedicated surface water sewers, and both foul and surface water flows from the site discharge into the public combined sewer network.
- 11 According to the LBC SFRA there are no historic records of internal or external sewer flooding in the part of the Borough where the Site is located.
- 12 The TWUL asset records shows that the Site is served by a number of connections to the public potable water network, with 18-inch (c. 450mm) and 16-inch (c. 400mm) diameter trunk mains located in Euston Road and Hamstead Road respectively.



Discussion for Scoping Out

Flood Risk, Surface Water and Hydrogeology

- 13 Flood risk is regulated through the National Planning Policy Framework (NPPF), which outlines the need for a site-specific FRA to be produced for all sites located within Flood Zone 2 and 3, those larger than one hectare, or those with critical drainage problems.
- 14 Although the site area does not exceed one hectare and is not located in Flood Zones 2 or 3, a site-specific FRA is required for the Proposed Development due to its location within a CDA. The FRA will be carried out in line with the NPPF and accompanying Planning Policy Guidance (NPPG) and will assess flood risk to the Proposed Development from fluvial and tidal, pluvial, groundwater and artificial sources, including sewers and reservoirs. The FRA will demonstrate that the Proposed Development is safe for its lifetime and that it does not increase flood risk elsewhere.
- 15 The FRA will also include appropriate recommendations for flood risk mitigation measures, as well as demonstrating safe access / egress routes for the Proposed Development as required. The FRA will assess the residual risk of flooding assuming the implementation of such measures.
- 16 Due to potential alterations to the existing basement as part of the Proposed Development, it is considered necessary to confirm the groundwater level on the site so that risk of groundwater ingress at basement level can be adequately evaluated and, if necessary mitigated through the structural design. A Basement Impact Assessment (BIA) will be submitted in support of the planning application, which will include an assessment of the impact of the proposed basement on flood risk and water resources; however, as there is an existing basement on the site the likely effects are considered likely to be insignificant once any mitigation measures are implemented. Although the site is not located in a Source Protection Zone, the BIA will discuss mitigation measures with a view to maintaining groundwater quality. Refer to *Demolition and Construction Works* section for further commentary of relevance to groundwater protection measures.
- 17 As the site is located in a CDA it is considered particularly important to demonstrate that a drainage strategy has been developed that adequately caters for the discharge of surface water and foul flows from the Proposed Development. As part of the FRA to be submitted as part of the Planning Application, a surface water drainage strategy will be presented. The strategy will present the existing site condition with respect to drainage, commenting on topography, existing surface water flow routes and sewerage infrastructure.
- 18 With respect to surface water, the strategy will propose a limiting discharge rate, as well as identifying the means of discharge in line with the drainage hierarchy set out in the London Plan². The strategy will give consideration to both the quantity and quality of surface water discharged and will include an appraisal of the feasibility of Sustainable Drainage Systems (SuDS) in line with current planning policy and industry best practice. The strategy will give an indicative attenuation volume to be provided to meet the proposed discharge rate, with the inclusion of an appropriate allowance for climate change.
- 19 Through a well informed and considered design process regarding flood risk and surface water drainage considerations, coupled with appropriate measures through the design to manage the residual flood risk at the site following redevelopment, no likely significant effects associated with flooding and surface water drainage are anticipated in line with London Plan Policies SI 12 and SI 13.
- 20 Policies SI 12 and SI 13 are Sustainable Infrastructure policies, covering flood risk management and sustainable drainage respectively. Policy SI 12 states that proposed developments “should ensure that flood risk is minimised and mitigated, and that residual risk is addressed” and that “buildings should be designed for quick recovery following a flood”. Policy SI 13 states that proposed developments “should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible ... in line with the drainage hierarchy”. Furthermore, the drainage design should aim to increase water efficiency and lead to improvements in water quality.
- 21 A review of relevant national, regional and local planning policy and guidance will form part of the FRA.

Sewerage and Water Supply Infrastructure

- 22 A Utilities Assessment will be undertaken to determine the potable water demands and wastewater (foul drainage) flows for the Proposed Development. The existing local (private) infrastructure will be surveyed to confirm condition and capacity with a view to reusing where appropriate.
- 23 TWUL undertakes modelling of its sewer network to calculate network capacity and to determine which parts of the network are to be upgraded. Consultation will be undertaken with TWUL to understand the extent and capacity of the existing sewer system. During planning, a pre-development enquiry will be submitted to TWUL with expected peak flow rates for internal assessment by TWUL. TWUL will then undertake the appropriate

² GLA, (2021); *The London Plan*



modelling work to identify what is required to cater for the flows from the Proposed Development to the public sewer. If formal permission to connect is required, this would be secured via the Section 106 agreement for the site following any future planning consent. The assessment (undertaken by TWUL) would confirm the capacity of the local sewer network and details relating to the point of connection (if new), with the aim of identifying any requirement for works to upgrade the local sewer network (if required) which would be undertaken by TWUL.

- 24** Where there is existing capacity available in the local sewer network, it is considered the increased peak foul flows will not result in a significant effect on TWUL infrastructure local to the site. If it is determined that capacity within the local sewer network needs to be increased, then TWUL would undertake the appropriate upgrade works to support the development as part of their statutory obligations. Therefore, following these works, any likely effect would remain not significant.
- 25** TWUL also produces Water Resource Management Plans (WRMP), which set out forecasts for water supply and demand, and outline the strategy proposed to meet consumers' needs into the future. As part of the production of the WRMP, TWUL has considered the projected future growth within its defined catchment area (i.e., London), with forecasts based on underlying source data from Government census data, past trends, and local authorities' forecasts of future population growth. TWUL bases its forecasts on a combination of these sources to determine the most likely scenarios for growth. It is therefore considered that the likely effects of the Proposed Development on water demand have been accounted for strategically within the TWUL assessments.
- 26** Compared with the existing building, an increase in water demand and foul flows is expected as a result of the Proposed Development due to the increase in floor area. To inform the detailed design stage, consultation with TWUL may result in the need to carry out flow and pressure tests for daily demand estimations for the Proposed Development. This will assess the available capacity in the local supply network and determine whether any upgrades are required to support the Proposed Development. However, the anticipated increase in foul flows generated by the Proposed Development would be compensated in part by the expected reduction in the rate of surface water discharged to the sewer network as a result of the new surface water drainage strategy. Furthermore, smart metering, water-saving and recycling measures to reduce rates of water consumption and to maximise future-proofing will be evaluated at the next design stage in line with London Plan Policy SI5 and incorporated where appropriate. Measures, such as the installation of low-flow fittings and greywater reuse, will also achieve a reduction in the volume of wastewater generated, thereby reducing the overall magnitude of the impact of the Proposed Development on the public sewer network. Following the inclusion of these measures and due to the Thames Water Resource Management Plan, it is considered that sufficient measures will be in place for water demand to be met and so no likely significant effects are anticipated.

Demolition and Construction Works

- 27** A number of water resources and drainage mitigation measures shall be implemented throughout the construction phase to protect water resources, particularly relating to groundwater and drainage. These mitigation measures can be categorised as 'Pre-Commencement' measures, and measures implemented throughout the demolition and construction works themselves.
- 28** Pre-Commencement:
- Discharge arrangements into the foul water sewer will be agreed with TWUL;
 - All existing utilities will be identified and marked before works commence, with the use of signs to warn of their presence;
 - Silt settlement facilities and oil / petrol interceptors will be installed at relevant discharge points into the sewers (for surface water runoff and wastewater discharges); and
 - An Emergency Response Plan (ERP) will be prepared, which will set out the procedure to be adopted in the event of a leak or spill.
- 29** During Enabling and Construction Works:
- Any damage to existing infrastructure would be immediately repaired;
 - Any waste effluent will be tested and any water that may encounter contaminated materials or be identified as being contaminated, will be disposed of appropriately and, to the satisfaction of the EA and/or TW; and where necessary, disposed of at the correctly licensed facility by a licensed specialist contractor/s;
 - Refuelling and delivery areas will be located away from the local sewer network drains;
 - Wherever possible, plant and machinery will have drip trays beneath oil tanks/engines/gearboxes/hydraulics, which will be checked and emptied regularly via a licensed waste disposal operator;



- All liquids and solids of a potentially hazardous nature (e.g., diesel fuel, oils, and solvents) will be stored in designated locations with specific measures to prevent leakage and release of their contents, including the siting of storage areas away from surface water drains, on an impermeable base with an impermeable bund that has no outflow and is of adequate capacity to contain 110% of the contents in accordance with the EA's requirements. Any tanks storing more than 200 litres of oil onsite, will have secondary bunding. Onsite provisions will be made to contain a serious spill or leak through the use of booms, bunding and absorbent material in accordance with the ERP;
- All storage will be protected from vandalism and kept locked up when not in use;
- All relevant contractors will be required to investigate opportunities to sustainably manage the use of water, such as turning off taps when not in use, both on site and within site offices and the use of recycled water / a rainwater harvesting system for equipment such as wheel washes; and
- The water consumption throughout the enabling and construction works will be monitored, either through sub-metering or reading of utility bills, to allow comparison against best practice benchmarks and improvements to be made.

Conclusion

- 30** The site is located in Flood Zone 1 ('low risk' of flooding from rivers and the sea) and the other baseline conditions in relation to the water environment show that flood risks from most sources are low. Flood risk from elevated groundwater will be evaluated further upon the acquisition of site-specific Ground Investigation records. If groundwater is found to coincide with the proposed basement level, appropriate mitigation measures will be incorporated into the structural design.
- 31** No likely significant effects are anticipated to water resources throughout the construction phase following the implementation of various standard mitigation measures both during pre-commencement and throughout the construction works, as defined above.
- 32** In recognition of the site being located in a Critical Drainage Area, a site-specific FRA will be prepared to accompany the planning application.
- 33** The FRA will include a suitable surface water drainage strategy for the Proposed Development that will incorporate mitigation by design to comply with local and national planning policy to ensure there are no significant adverse impacts associated with surface water drainage from the Proposed Development.
- 34** TWUL will be consulted throughout the design process to ensure water supply and wastewater discharge requirements are assessed in full and the necessary technical/legal agreements are in place before construction and occupation.
- 35** Therefore, it is concluded that the Proposed Development is unlikely to result in significant effects associated with water resources and as such further assessment in respect of water resources can be **scoped out** of the EIA.

Annex F: Archaeological Desk Based Assessment

An Archaeological Desk Based Assessment has been submitted with the planning application as a standalone deliverable.

Annex G: Preliminary Ecological Appraisal

A Preliminary Ecological Appraisal has been submitted with the planning application as a standalone deliverable.

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Appendix: EIA Methodology

Annex 1: EIA Scoping Report

Annex 2: EIA Scoping Opinion

Annex 3: Cumulative Schemes List and Map

Euston Tower EIA Scoping Report Review

Review of Euston Tower: Request
for an EIA Scoping Opinion Report
(Trium, August 2023)

CBRE

NOVEMBER 2023

LEGAL NOTICE

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1.Introduction

Background

- 1.1.1. The Sustainability, Impact Assessment & Social Value team at CBRE Limited (‘CBRE’) has been commissioned by the London Borough of Camden (LB Camden) to provide independent Environmental Impact Assessment (EIA) advice in relation to the proposed redevelopment of a site located at 286 Euston Road, within the London Borough of Camden (the ‘proposed development’).
- 1.1.2. In due course, British Land Property Management Limited (‘the Applicant’) will be submitting a full planning application for the proposed development to LB Camden for approval, with LB Camden being the determining authority.
- 1.1.3. The application site is approximately 0.88 hectare (ha) in area and currently consists of a ground plus 36-storey building with a basement in the east of the site and Regents Place Plaza in the west of the site. The building comprises retail floorspace at ground and first floor levels, with vacant office floorspace on the levels above. The basement comprises car and cycle parking and is connected to the wider Regents Campus basement, which also provides a servicing yard used by Euston Tower.
- 1.1.4. The proposals comprise the partial demolition of the existing building on-site, with the building’s central core, basement and foundations to be retained, and the construction of a commercial-led development to deliver a total floorspace of approximately 80,000 sqm Gross Internal Area (GIA), comprising predominantly office and lab enabled floorspace (Use Class E) plus some Flexible Use Class E floorspace.
- 1.1.5. In line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended in 2018 and 2020), the Applicant recognises the need for the proposed development to follow the full EIA process due to the scale of the proposed development in the context of the surrounding area (see Section 2 of this report). As such, the Applicant will be preparing an Environmental Statement (ES), which will be submitted in support of the planning application in due course. The Applicant has commissioned Trium as Lead EIA Consultant for the proposed development.
- 1.1.6. The purpose of this document is to report the outcome of CBRE’s review of the EIA Scoping Report, prepared by Trium (dated August 2023), and provide commentary suitable for inclusion in LB Camden’s EIA Scoping Opinion.

Structure of this Document

- 1.1.7. The remaining parts of this report are structured as follows:
 - An assessment of regulatory compliance;
 - Review of proposed EIA approach; and
 - Summary and conclusions.

2. Regulatory compliance

The development in the context of the EIA regulations

- 2.1.1. The procedures for carrying out EIA for a development within the terrestrial environment are set out within the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended in 2018¹ and 2020²) - herein the ‘EIA Regulations 2017’.
- 2.1.2. The proposed development is not Schedule 1 development, for which EIA would be mandatory. With reference to Schedule 2 development, the proposed development is of a type listed under Category 10(b) urban development projects (including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas).
- 2.1.3. A development is considered to be Schedule 2 development if any part of it lies within a ‘sensitive area’ or if it meets or exceeds the relevant thresholds and criteria for that category of development, as detailed in the EIA Regulations 2017. For category 10(b) projects, these are as follows:
 - The development includes more than 1 hectare of urban development which is not dwelling-house development; or
 - The development includes more than 150 dwellings; or
 - The overall area of the development exceeds 5 hectares.
- 2.1.4. As confirmed in the EIA Scoping Report, the proposed development does not fall within the classification of Schedule 2, 10(b) urban development projects as it does not exceed the above criteria, nor is the site located within a ‘sensitive area’ as defined by the EIA Regulations.
- 2.1.5. However, taking into account the scale of the development proposed and nature of the site and surrounding area, it is considered that there is the potential for significant environmental effects to arise. As such, the Applicant has proposed to undertake a voluntary EIA in accordance with the requirements of the EIA Regulations and submit an ES in due course, in conjunction with the planning application. CBRE agree with the proposed approach to submit an ES with the planning application. Commentary on the scope and methodology of the ES, as proposed within the EIA Scoping Report, is provided in Section 3 of this report.

EIA Scoping Compliance

Consultation

- 2.1.6. No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

¹ The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018.
² The Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020.

CBRE Review

- 2.1.7. Regulation 15(2)(a) of the EIA Regulations 2017, sets out what must be included in a Request for a Scoping Opinion. Table 2.1 sets out the EIA Scoping Report’s compliance with the requirements of this Regulation.
- Table 2.1
Review of the EIA Scoping Report in respect of the EIA Regulations
- | EIA Regulation Requirement | Requirement met in the EIA Scoping Report? |
|---|---|
| A plan sufficient to identify the land | Yes – Figure 1 provides an aerial imagery plan of the site location and Figure 2 provides the indicative redline planning application boundary. As noted in Figure 2’s caption, the redline planning application boundary shown is indicative. This is noted; should the boundary materially change for the planning application, the Applicant should consider re-scoping to ensure the EIA Scoping Report remains valid. It is also noted that a different site boundary is shown in a number of the technical topic sheets presented in Annex D and Annex E. The ES should ensure that the correct site boundary (i.e. the redline boundary being used for the purpose of the planning application) is included on all figures and is used to inform the assessment scope. |
| A brief description of the nature and purpose of the development, including its location and technical capacity | Yes – a brief description of the site and the nature of the proposed development are provided in <i>Site Location and Description</i> (paragraphs 14-18) and <i>The Proposed Development</i> (paragraphs 21-26) respectively.

The EIA Scoping Report does not make it explicitly clear what the purpose of the proposed development is. It is noted that paragraph 22 refers to considerations that have fed into the design evolution process, including a feasibility study; however, no explanation has been provided as to why the development is needed and why alternative options (such as refurbishment) have not been considered further. This should be made explicitly clear in the ES in due course. |
| An explanation of the likely significant effects of the development on the environment | Yes – an explanation of the likely significant environmental effects of the development is provided in <i>Scope of The EIA – Environmental Topics</i> , <i>Annex D: Scoped In Topic Sheets</i> and <i>Annex E: Scoped Out Topic Sheets</i> . |
| Such other information or representations as the person making the request may wish to provide or make | Additional information such as the general EIA methodology has been included within the EIA Scoping Report (<i>Annex A: Approach to EIA Scoping and EIA Methodology</i>). |
- 2.1.8. As set out in the table above, the EIA Scoping Report is broadly considered to meet the necessary regulatory requirements. However, further clarity on the purpose of the proposed development would be useful to provide context to the assessment methodologies proposed. It is also noted that the redline planning application boundary is shown as ‘indicative’ in the EIA Scoping Report. Should this materially change for the planning application, the Applicant should consider revisiting the EIA Scoping process to confirm that the scope and methodology set out in the EIA Scoping Report remains valid. The ES should also ensure that the correct redline boundary plan is included on all figures, including any figures in existing reports that are proposed to be submitted with the planning application.

3. Review of Proposed EIA Approach

Overview

- 3.1.1. The outcome of CBRE’s review of the proposed EIA approach is set out in this chapter. The review takes into account comments provided by the consultees. Where an alternative approach has been recommended, this is clearly set out under the relevant topic heading.
- 3.1.2. In undertaking this review, CBRE have had regard to:

a) any information provided by the Applicant about the development;

b) the specific characteristics of the particular development;

c) the specific characteristics of development of the type concerned; and

d) the environmental features likely to be significantly affected by the development (Regulation 15(6)).
- 3.1.3. Responses from the following consultees have been taken into account in undertaking this review:

– Thames Water;

– Environment Agency (EA);

– Transport for London (TfL);

– Natural England (NE);

– Historic England (HE);

– Nature Conservation Officer at LB Camden;

– Contaminated Land Officer at LB Camden;

– Metropolitan Police;

– LBC Green Space;

– Inclusive Economy Project Officer at LB Camden;

– Sustainability Officer at LB Camden; and

– Members of the public, as specified in the relevant sections below.
- 3.1.4. The consultation responses are provided in full in Appendix A.

Introduction, Purpose of the Report, and Structure of the EIA Scoping Report

Consultation

- 3.1.5. No responses have been received from the consultees in relation to these sections of the EIA Scoping Report.

CBRE Review

- 3.1.6. These sections of the EIA Scoping Report provide a brief overview of the application site, the proposed development in the context of the EIA Regulations 2017, the purpose and structure of the EIA Scoping Report, and the relevant expertise or qualifications of Trium as the author of the EIA Scoping Report. The information provided here is generally considered acceptable. Comments on the acceptability of the proposed EIA scope itself are provided later in this report.

Site Location and Description and Environmental Context

Consultation

- 3.1.7. No responses have been received from the consultees in relation to these sections of the EIA Scoping Report.

CBRE Review

- 3.1.8. These sections of the EIA Scoping Report provide a helpful overview of the site and surrounding context, including key environmental features and designations, as listed in Table 2. The information provided here is generally considered to be acceptable; however the Applicant should consider the below comments when preparing the ES.
- 3.1.9. Paragraph 15 of the EIA Scoping Report confirms that the building comprises operational commercial properties at ground floor, with vacant office floorspace on the floors above; however, it would be useful to understand how long the office floorspace has been vacant for and how this has been used to inform the baseline position for the purpose of the EIA. Commentary relating to the baseline scenarios for each of the technical assessments is provided in the relevant sections later in this report, however, as a general comment, it is not always clear what the technical topics are considering as the existing baseline.
- 3.1.10. Table 2 lists the sensitive receptors for each environmental topic. However, based on a desk-based review of the surrounding area, this list is not considered to be comprehensive. In this regard, it is noted that Air Quality focuses on the University College Hospital and nearby residential receptors and Noise and Vibration focuses on just residential receptors. No mention has been given to the Radisson Hotel to the south of the site. In addition, the section on the Socio-Economics baseline conditions is limited to the provision of health care within the study area (1km of the site) rather than providing a more holistic overview of the demographic and economic profile of the area. In preparing the ES, consideration should be given to all surrounding sensitive receptors and baseline conditions. Where sensitive receptors are proposed to be scoped out of a technical assessment, clear justification should be provided as to why significant effects are not considered likely.
- 3.1.11. There are some inconsistencies within the EIA Scoping Report when referring to the distance of Regents Park from the site. The Applicant should ensure the distances reported in the ES are correct and consistent throughout.
- 3.1.12. Figure 3 shows a Scheduled Monument is located approximately 500 m south west of the site, which has not been mentioned in Table 2 nor within the Townscape, Visual and Built Heritage Topic Sheet in Annex D. The Applicant should ensure that all sensitive receptors within the study area are considered within the ES.

The Proposed Development

Consultation

- 3.1.13. The following responses have been received from the consultees in relation to The Proposed Development section of the EIA Scoping Report:
 - Inclusive Economy Project Officer at LB Camden.

CBRE Review

- 3.1.14. This section of the EIA Scoping Report sets out a brief description of the proposed development, including a high level overview of the maximum design parameters, including building heights and floorspace quanta. The energy strategy is also identified, as is the duration of the construction programme. The information provided here is generally considered acceptable; however, the below should be taken into account when preparing the ES.
- 3.1.15. Paragraph 21 sets out the quantum of floorspace proposed; however, the breakdown of floorspace does not add up to the total quantum of floorspace proposed (80,000 sqm GIA). It is assumed that the remaining floorspace comprises ancillary floorspace. This should be clarified in the ES.
- 3.1.16. It is understood that the proposed development will deliver laboratory enabled floorspace; however, no further information is provided in this section. Elsewhere in the EIA Scoping Report (see the Topic Sheet on Project Vulnerability, Major Accidents and Disasters, Annex E), the Applicant has confirmed that this will consist of ‘wet’ laboratory enabled floorspace and goes on to provide more information on what this would comprise and the likely substances associated with ‘Category 2 Laboratories’. It would have been useful to have more information on the laboratory enabled floorspace in The Proposed Development section for the reader to have a more comprehensive understanding of the proposals when reviewing each of the topic sheets. Key information on the types of land uses proposed and their operation should be clearly set out within ES Chapter 4: The Proposed Development.
- 3.1.17. The proposed building height is provided in m Above Ordnance Datum (126 m AOD); however the existing building height described in the Introduction section (paragraph 22) is provided as the number of storeys (ground plus 36-storeys). To enable a like-for-like comparison and allow the reader of the ES to understand the height of the proposed development in the context of the existing building, the ES should clearly set out the existing and proposed heights using the same metric (i.e., m AOD).
- 3.1.18. In the response provided by the Inclusive Economy Project Officer at LB Camden on 5 October 2023, they would expect that the development would trigger the need for affordable workspace and have set out a number of ways in which this could be achieved. The proposed development ES chapter (Chapter 4) should clearly set out the quantum of affordable workspace and whether this meets policy requirements.
- 3.1.19. The Inclusive Economy Project Officer has also set out a number of expectations for the proposed development once operational to ensure that the scheme delivers local employment benefits in the long term. Whilst the ES is not intended to demonstrate policy compliance, the ES should confirm what the Applicant is committing to. Any commitments made should be considered as part of the Socio-Economics assessment.

- 3.1.20. The Inclusive Economy Project Officer at LB Camden has also set out a number of requirements that must be considered for the demolition and construction works, notably in respect of apprenticeships, work experience placements, local recruitment and local procurement. The demolition and construction ES chapter (Chapter 5) should clearly set out what the Applicant is committing to and whether this meets Camden’s requirements, with reference to Camden’s Planning Guidance on Employment Sites and Business Premises (January 2021).

Scope of the EIA

Consultation

- 3.1.21. No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

CBRE Review

- 3.1.22. This section of the EIA Scoping Report provides an overview of the Report in the context of the EIA Regulations 2017, the anticipated demolition and construction phasing, the scope of the EIA, and the format of the planning application, including the information which will inform the basis of the EIA. Commentary on the EIA Methodology, Cumulative Assessment and Technical Scopes, as set out within Annexes A, C, D & E respectively, is presented later in this report.
- 3.1.23. Paragraph 28 of the EIA Scoping Report sets out the contents of the EIA Scoping Report in accordance with Regulation 15 of the EIA Regulations. As noted in Table 2.1 of this report, the EIA Scoping Report does not make it explicitly clear what the purpose of the proposed development is. This should be made explicitly clear in the ES in due course.
- 3.1.24. Paragraph 31 states that “*whilst the demolition and construction phasing is still being developed, it is expected that all works will be completed prior to occupation of any aspect of the Proposed Development. It is therefore unlikely that there would be any introduced sensitive receptors requiring assessment. Should the phasing be altered to include early occupation during construction, this would be considered within the technical assessments where applicable*”. CBRE agree with this approach.

Proposed Structure of the Environmental Statement

Consultation

- 3.1.25. No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

CBRE Review

- 3.1.26. This section sets out the proposed scope and structure of the ES, which will comprise the following:
- Volume 1: Main ES;
 - Volume 2: Townscape, Visual and Built Heritage Assessment;
 - Volume 3: Technical Appendices; and
 - Non-Technical Summary (NTS).

- 3.1.27. The proposed structure is considered to be appropriate and it is acknowledged that a separate volume is often provided for the Townscape, Visual and Built Heritage Assessment due to the length of reporting and inclusion of visualisations.

Request for an EIA Scoping Opinion

Consultation

- 3.1.28. No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

CBRE Review

- 3.1.29. This section sets out the purpose of the EIA Scoping Report and invites LB Camden and consultees to provide their comments within the five-week period prescribed by the EIA Regulations. This is noted and based on receipt of the EIA Scoping Report on 04 August 2023, LB Camden must adopt their scoping opinion by 08 September 2023, unless agreed otherwise in writing with the Applicant.

Annex A: EIA Scoping and Environmental Statement Methodology

Consultation

- 3.1.30. The following responses have been received from the consultees in relation to Annex A of the EIA Scoping Report:
- Ursula Brown (member of the public, received 14 August 2023).

CBRE Review

- 3.1.31. Annex A of the EIA Scoping Report provides an overview of the approach to EIA scoping and the general EIA methodology and assessment approach, including the terminology and approach for determining effect significance.

Use of Competent Experts

- 3.1.32. This section summarises the relevant expertise of Trium as the author of the EIA Scoping Report and confirms that information on Trium’s lead EIA practitioners, as well as the technical contributors to the EIA, will be included within the ES. This approach is in line with the requirements of the EIA Regulations 2017 and is considered acceptable.

EIA Purpose and Process

- 3.1.33. With reference to the requirements of Regulation 4 of the EIA Regulations 2017, this section lists the environmental topic areas that have been considered in respect of the potential for likely significant effects as a result of the demolition and construction stage and operational stage of the proposed development.

- 3.1.34. It is noted that no reference has been made to potential impacts relating to telecommunication interference. CBRE acknowledge that matters relating to telecommunication interference are typically dealt with by way of standard planning conditions and that, in line with Camden’s Local Area Requirements for Planning Applications (2020), a standalone Telecommunications Report is anticipated to be submitted with the planning application. However, it would be useful if the EIA Scoping Report confirmed this and included a list of all the planning deliverables to be submitted with the planning application.
- 3.1.35. Based on the above, the list of environmental topic areas is considered to be comprehensive in line with the EIA Regulations 2017.

The Scoping Process

- 3.1.36. This section sets out the scoping process and purpose with reference to Regulation 15 of the EIA Regulations 2017.
- 3.1.37. Paragraph 12 confirms that *“the EIA Scoping Report (this document) and EIA Scoping Opinion will be appended to the ES, which will include a summary of any other consultation undertaken as part of the EIA process.”* The Applicant should ensure that the ES clearly sets out how relevant comments made during the EIA Scoping Process and wider consultation process have been addressed within the ES. A summary of relevant consultee comments could, for example, be set out in ES Chapter 2: EIA Methodology and in the Methodology sections of the individual technical chapters, as appropriate.

EIA Methodology and Approach to Assessment of the Proposed Development

- 3.1.38. The EIA methodology and approach is discussed under a number of sub-topics, as set out in the following sections. Relevant EIA guidance is listed at the outset, although noting that this list is not exhaustive.

Baseline Conditions and Sensitive Receptors

- 3.1.39. These sections include an overview of how the baseline conditions and sensitive receptors have and will be determined.
- 3.1.40. The Baseline Conditions section confirms that some assessments (such as traffic and transport and air quality) will include a future baseline condition *“at the projected year of opening of the Proposed Development (if relevant a different future year appropriate/specific for the technical assessment may be used)”*. The use of a future baseline year for certain topics is considered appropriate provided that clear justification is provided within the respective technical chapters. The Applicant may also want to consider using an interim future baseline year for some topics (such as traffic and transport, air quality and noise and vibration) for the demolition and construction stage assessment in order to capture the most intensive year of demolition and construction works in terms of the number of vehicle movements.
- 3.1.41. Paragraph 15 of the EIA Scoping Report confirms that the office floorspace is vacant; however, it would be useful to understand how long it has been vacant for and what has been considered as the baseline position for the purpose of the EIA. As discussed later in this report, the baseline position for each of the technical topic assessments has not been clearly set out.

Demolition and Construction Impact Assessments, Environmental Design Management Measures and Completed Development Impact Assessments

- 3.1.42. These sections provide an overview of the information that will form the basis of the demolition and construction stage and completed development stage impact assessments, including any ‘embedded measures’ which are inherent in the design and construction of the proposed development.
- 3.1.43. Paragraph 22 states that *“Throughout the demolition and construction impact assessments, the assumption will be made that the standard environmental controls required under legislation and best practice guidance are met as a matter of course”*. The section on Environmental Design Management Measures then goes on to confirm what is defined as ‘embedded mitigation’ for the purpose of the ES, confirming that *“all embedded mitigation and enhancement measures will be described within the Proposed Development chapter of the ES with the rationale for the inclusion of the identified embedded measures and the associated commitment to implementing such measures clearly stated. In addition, mitigation and enhancement measures and any monitoring requirements will be summarised within ES Volume 1: Chapter 15: Environmental Management, Mitigation and Monitoring Schedule”*. This approach is considered appropriate. In addition, each technical assessment should clearly set out what embedded mitigation measures have been relied upon to inform their assessment of effects. In respect of the environmental controls during the demolition and construction stage, only those standard measures (i.e., those that would occur with or without input from the EIA) should be considered as ‘embedded mitigation’.
- 3.1.44. Paragraph 24 provides an overview of the information to be included should monitoring be required, noting that this would include the *“procedures regarding the monitoring of the relevant significant adverse effects, the types of parameters to be monitored and the monitoring duration”*. The monitoring strategy should also define the procedures to be implemented should significant adverse effects be identified through the monitoring process to ensure their effective mitigation.
- 3.1.45. In respect of the completed development stage assessment, the EIA Scoping Report confirms that *“for assessing Use Class E, where confirmation on the end use within this use class cannot be provided, the EIA will assess the realistic worst-case end use within the Use Class E floorspace sought for approval, depending on the technical topic”*. This approach is considered acceptable. The ES should clearly set out any assumptions that have been made to inform the respective technical topics.

Cumulative Effects Assessment

- 3.1.46. This section of the EIA Scoping Report sets out the inter-development cumulative effects assessment approach and the criteria used in identifying the cumulative schemes to be considered. The preliminary list of cumulative schemes for consideration within the EIA is presented in Annex C, for which commentary is provided in the relevant section of this report.
- 3.1.47. The criteria for selecting cumulative schemes is generally accepted, noting that the criteria have generally been based on the EIA screening thresholds for Category 10(a) industrial estate development projects or Category 10(b) urban development projects, which are considered to represent the vast majority of the projects in the surrounding area. However, the criteria does not give consideration to other projects outside of these categories. Of note and in line with the consultee comment provided by Ursula Brown, consideration should be given to Nationally Significant Infrastructure Projects (NSIPs) due to the proximity of Euston Station High Speed 2 (HS2) (refer to commentary on Annex C).

- 3.1.48. The criteria, as set out in paragraph 35, also includes “*Applications that have been submitted but not yet determined*”. Under the EIA Regulations 2017, the requirement for considering cumulative schemes within the inter-development cumulative assessment is restricted to “*cumulation with other existing development and/or approved development*”. This omits the previous requirement to assess schemes that are ‘reasonably foreseeable’ under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. Accordingly, while this conservative approach is welcomed, CBRE advise that applications that have been submitted but not yet determined should be included on an individual basis, in consultation with LB Camden, depending on the likelihood of them coming forward.
- 3.1.49. As stated in paragraph 37 of the EIA Scoping Report, the local authority and other consultees are invited to comment on the proposed cumulative schemes. CBRE agree with this approach and advise that the list should be reviewed during the preparation of the ES and up until the point of determination of the planning application.
- 3.1.50. Paragraph 38 states that “*each technical ES chapter will be clear on the cumulative schemes that have been considered within the cumulative effects assessment*”. CBRE agree with this approach as long as clear justification is provided for any schemes which have been screened out.

Effect Interactions Assessment

- 3.1.51. This section sets out the intra-development cumulative effects assessment approach. CBRE generally agree with the assessment approach, including the proposed approach to exclude any negligible effects from the assessment of effect interactions.
- 3.1.52. Paragraph 42 states that “*The interaction of a combination of individual effects would be determined to be either ‘not significant’ or ‘significant’, a scale of the combined effects (minor, moderate or major) would not be applied*”. Whilst it is acknowledged that there is no established methodology for assessing intra-development cumulative effects, CBRE advise that a scale of effect is identified based on professional judgement as it is important that the regulatory authority has full sight of the scale and nature of significant effects when determining any application. Furthermore, it is important to identify the scale of effect when determining and presenting the effectiveness of any mitigation proposed. Refer to Schedule 4, Paragraph 7 of the EIA Regulations that states that the “*description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects... should explain the extent to which significant adverse effects on the environment are avoided, prevented, reduced or offset*”.

Alternatives and Design Evolution

- 3.1.53. This section sets out the information to be included within the Alternatives and Design Evolution ES chapter to address the requirements of Schedule 4 of the EIA Regulations. CBRE consider this to be acceptable.

Determining Effect Significance – Terminology and Approach

- 3.1.54. This section of Annex A of the EIA Scoping Report sets out the terminology and approach for determining effect significance. The matrix approach is considered acceptable and in line with standard, recognised EIA practice.

Annex B: Planning Policy Context

Consultation

- 3.1.55. No responses have been received from the consultees in relation to Annex B of the EIA Scoping Report.

CBRE Review

- 3.1.56. Annex B of the EIA Scoping Report provides an overview of the national, regional and local policy context relevant to the EIA and where this will be presented in the ES. This approach is considered acceptable and CBRE encourage the use of appendices, as appropriate, where extensive policy detail may be required.

Annex C: Cumulative Schemes

Consultation

- 3.1.57. Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:
- Ursula Brown, member of public.

CBRE Review

- 3.1.58. Annex C of the EIA Scoping Report presents the preliminary list of cumulative schemes, together with a figure showing their location relative to the site.
- 3.1.59. The level of detail set out in the table is useful. However, an additional column would be useful to confirm the approximate location and distance of the scheme in relation to the site. It is also noted that the final column of the table provides the scheme status “*as of February 2023*”. Given that the EIA Scoping Report was formally submitted to LB Camden in August 2023 and the need to keep the list of cumulative schemes under constant review, it is expected that this is a typographical error that hasn’t been updated. Clarification is sought in this regard and it is recommended that the Applicant undertakes further consultation with the LB Camden to agree on the list of schemes, confirm their status and the likelihood of them coming forward (see commentary on Annex A, Cumulative Effects Assessment).
- 3.1.60. According to the table, scheme 2a is partly built out with some plots still to be constructed. In line with the approach set out in paragraph 39 of Annex A, it is expected that each technical topic will give consideration as to whether this scheme will be factored into the baseline scenario assessment given that the majority of the scheme’s built form will likely be present during the demolition and construction and operational stages of the proposed development. CBRE agree with this approach as long as each technical assessment provides clear justification as to how each cumulative scheme has been considered.
- 3.1.61. As per the comment received from Ursula Brown on 14 August 2023, High Speed 2 (HS2) and Euston Station have not been included within the cumulative schemes list. It is noted that the Transport Topic Note (Annex D) considers HS2 in the future baseline position; however, HS2 has not been mentioned elsewhere. Given the proximity and scale of the scheme, this should be included.

Annex D: Scoped In Topic Sheets

3.1.62. Annex D of the EIA Scoping Report sets out the topics that the Applicant is proposing to scope into the ES as discrete chapters. These are discussed below.

Air Quality

Consultation

3.1.63. Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:

- TFL; and
- Sustainability Officer at LB Camden.

CBRE Review

3.1.64. This section sets out the proposed approach to the assessment of air quality effects.

3.1.65. It is noted that the section does not confirm which consultant team will be undertaking the technical assessment, as has been done for all other technical topics. Based on discussions with the Applicant, it is understood that this is an accidental omission and Air Quality Consultants are the consultant team who will be undertaking the assessment.

3.1.66. As confirmed in the Baseline Conditions section, the monitoring data from 2019 will be used within the air quality assessment unless appropriate 2022 monitoring data is published in time for the assessment to be undertaken. This is because of the impact of the COVID-19 pandemic on traffic volumes during 2022 and 2021, resulting in the air quality conditions during this period not being representative of the typical baseline environment. CBRE generally agree with this approach. If the 2022 monitoring data is published during the assessment process and prior to submission of the planning application, this data should be reviewed against the 2019 data to check if the latest data will have any implications to the overall results of the ES. Should there be any notable changes in baseline conditions, the Applicant should consider revisiting the assessment so that it captures the worst-case scenario.

3.1.67. The Applicant should also confirm what they consider to be the baseline scenario for the site in respect of vehicular movements (i.e., will the baseline scenario be based on a vacant site with no operational vehicular movements or will the baseline scenario consist of the vehicular movements prior to the site becoming vacant). As discussed in the Site Location and Description and Environmental Context section of the EIA Scoping Report, it would be useful to understand when the site became vacant. The baseline conditions for the traffic data used for the Transport, Air Quality and Noise and Vibration assessments should be clearly set out in the ES, with clear justification provided as to why the traffic data is considered to be representative of a conservative, yet reasonable baseline scenario.

3.1.68. The Applicant has confirmed that the sensitive receptors during the completed development stage will be identified to represent a range of exposure, focusing on worst-case locations where the air quality objectives (AQOs) apply. However, when listing the sensitive receptors relevant to the specific AQOs, no reference has been made to hotels, noting that the Radisson Hotel is located to the south of the site. In line with DEFRA’s LAQM guidance, hotel receptors should be considered for the 1-hour mean AQO.

3.1.69. Paragraphs 20 and 23 present the assessment scenarios should the traffic from the proposed development exceed the IAQM screening criteria during the demolition and construction stage and operational stage, respectively. Three assessment scenarios have been proposed for both stages, with the proposed development considered in the third scenario, which looks at the impact of the proposed development against the existing baseline and cumulative schemes. As discussed in the below sections, the Traffic and Transport and Noise and Vibration technical scopes have not set out their assessment scenarios; however, it is understood the assessment scenarios comprise the following:

- Scenario 1: Existing Baseline;
- Scenario 2: Future Baseline (with TEMpro growth);
- Scenario 3: Future Baseline + Proposed Development; and
- Scenario 4: Future Baseline + Proposed Development + Cumulative Schemes.

3.1.70. Given that each of the topics are based on the same traffic data and to ensure consistency across the ES, CBRE would expect that the assessment scenarios for each technical topic to be the same, unless clear justification is provided otherwise. The ES should clearly set out the assessment scenarios for each topic, providing justification as to why this is considered to be representative of a reasonable, worst-case assessment.

3.1.71. The Applicant is proposing to scope out the assessment of emissions from fume cupboards associated with the potential lab enabled floorspace (Use Class E). This is on the basis that the proposed development will comply with regulations on the design and operation of fume cupboards. CBRE consider this approach to be acceptable subject to the ES providing sufficient information on the potential design of fume cupboards with reference to the relevant regulations.

3.1.72. TFL have stated that they expect significant impacts to vehicular traffic in relation to construction access and that the construction access proposals should be considered as part of the air quality and noise and vibration assessments in the EIA. CBRE agree that the Applicant should consider construction access when modelling air quality impacts from construction traffic. Paragraph 20 of Annex A confirms that the Demolition and Construction chapter (which will form the basis of the technical assessments) will include information on HGV routing and as such, it is assumed that the Applicant has already factored this within their assessment approach.

3.1.73. The Sustainability Officer at LB Camden have queried whether there will be a standalone Air Quality Assessment or whether Air Quality will just be considered within the EIA, noting that this would be acceptable as long as the EIA covers the requirements of a standalone AQA. A standalone Air Quality Assessment (AQA) is not included in the list of technical documents that will be submitted with the planning application (Paragraph 38 of the Main EIA Scoping Report). On the understanding that a standalone AQA is not being submitted, CBRE agree that the EIA should include the requirements for a standalone AQA, as listed in Camden’s validation checklist³. However, upon review of the Air Quality Topic Sheet, CBRE understand that the assessment will include these requirements, specifically noting that the ES will include an air quality neutral assessment and an air quality positive statement.

3.1.74. CBRE advise that the Applicant should consult with LB Camden’s EHO advisor in regard to key elements of the proposed methodology.

³ London Borough of Camden, 2020. Camden’s Local Area Requirements for Planning Applications. <https://www.camden.gov.uk/documents/20142/12053822/LARs+2020+%28republished%29.pdf/ea1f2c0e-c643-0100-40c3-b1188a0badc3?t=1645193008819>

- 3.1.75. Subject to the comments above, the proposed approach for the air quality assessment is considered acceptable.

Climate Change and Greenhouse Gases (GHG)

Consultation

- 3.1.76. No consultee responses have been provided to CBRE in relation to this section of the EIA Scoping Report.

CBRE Review

- 3.1.77. This section sets out the proposed approach to the assessment of effects relating to climate change.
- 3.1.78. As confirmed in the Receptors section, the global climate is the receptor for the purpose of the GHG assessment. It is also noted that the sensitive receptors identified for the remaining ES technical topics will also be considered when looking at how future climate conditions may affect these sensitive receptors.
- 3.1.79. The Baseline Conditions section states that the baseline emissions will be calculated based on the current operation of the site in terms of transport and energy emissions. As per comments made on other topic scopes, it is not clear what is considered to represent the baseline position, noting that the building is currently vacant. The worst-case assumption whereby the baseline emissions are assumed to be zero may therefore be a reasonable baseline position. However, in informing this decision, the Applicant should consider other factors, such as how long the building has been vacant for, the potential for the building to be let in its existing condition etc. Based on paragraph 10, it is inferred that the Applicant will not be assessing the net emissions from the site and will consider all emissions emitted by the proposed development. The assessment approach should be clarified within the ES.
- 3.1.80. Subject to the comments above, the proposed approach for the climate change and GHG assessment is considered acceptable.

Daylight, Sunlight, Overshadowing and Solar Glare

Consultation

- 3.1.81. No consultee responses have been provided to CBRE in relation to this section of the EIA Scoping Report.

CBRE Review

- 3.1.82. This section sets out the proposed approach to the assessment of effects relating to daylight, sunlight, overshadowing and solar glare.

- 3.1.83. Paragraph 5 in the Baseline Conditions section states that the Sun Hours on the Ground (SHOG) method will be used with regard to outdoor amenity areas within the site. Figure 2, which shows the areas of amenity space to be considered within the overshadowing assessment, also includes the amenity space within the site. The assessment should look at the impact of the proposed development on surrounding receptors. It is recommended that any outdoor amenity space within the site itself should be considered as part of the internal daylight, sunlight and overshadowing assessment in accordance with the BRE’s ‘Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice’ 3rd Edition (BRE209) or similar, which is usually submitted as a standalone report to support the planning application. In this regard, it is noted that the incorrect redline boundary is shown in Figures 1-3, assuming that Figure 2 of the main EIA Scoping Report is correct. The ES should be based on the final redline boundary used for the planning application.
- 3.1.84. In respect of the amenity spaces to be considered within the overshadowing assessment, the area shown for Tolmer’s Square is limited to the area of green space. CBRE consider that all amenity space should be assessed, including the hardstanding. Additionally, there are areas adjacent to Tolmer’s Square which are not shown in Figure 2, namely Foundry Mews which wraps around the outside of Tolmer’s Square, as well as George Mews to the north. The Applicant should give consideration to these areas in the ES, clearly setting out the extent of the study area.
- 3.1.85. Subject to the comments above, the proposed approach for the climate change and GHG assessment is considered acceptable.

Noise and Vibration

Consultation

- 3.1.86. Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:
- TFL.

CBRE Review

- 3.1.87. This section sets out the proposed approach to the assessment of noise and vibration effects.
- 3.1.88. It is noted that Figure 1 shows the incorrect site boundary. The ES should ensure that the correct site boundary (i.e. the redline boundary being used for the purpose of the planning application) is included on all figures.
- 3.1.89. Table 1 includes two references to monitoring position ‘P2’ and no reference to ‘P1’. It is assumed that this is a typographical error and the first line refers to ‘P1’. It is also noted that Table 2 refers to the five unmanned monitoring positions as ‘1-5’ rather than ‘P1-P5’, as referred to in Table 1. The Applicant should ensure that the monitoring positions referenced in the ES are accurate and that consistent terminology is used.
- 3.1.90. Whilst the assessment scenarios for noise and vibration have not been clearly laid out, it is assumed, based on paragraph 10, that there will be the following four scenarios for the completed development stage assessment:
- Scenario 1: Existing Baseline;
 - Scenario 2: Future Baseline (with TEMpro growth);
 - Scenario 3: Future Baseline + Proposed Development; and
 - Scenario 4: Future Baseline + Proposed Development + Cumulative Schemes.

- 3.1.91. CBRE consider these assessment scenarios to be acceptable. However, it is noted that these assessment scenarios differ from those proposed in the Air Quality scope. As discussed in the Air Quality section above, CBRE consider that the assessment scenarios should be consistent between the traffic and transport, air quality and noise and vibration assessments, unless clear justification can otherwise be provided.
- 3.1.92. Figure 2 presents the existing and proposed sensitive receptors which could be affected by noise and vibration impacts from the proposed development. Given that there is no intervening structure between the site and the building between A and H along Triton Square, CBRE consider that this commercial building should also be considered as a sensitive receptor unless sufficient justification can be given for its exclusion.
- 3.1.93. The Potential Effects section sets out the technical scope of the noise and vibration assessment for both the demolition and construction stage and completed development stage. Whereas the proposed scope of the completed development stage assessment has been set out as a bullet point list, the demolition and construction stage scope is described more generally and states that the assessment will include “*demolition, construction activity and traffic*”. However, as set out in the section on Non-Significant Effects to be Scoped out the EIA, demolition and construction traffic is proposed to be scoped out the assessment. Clarification is sought in this regard. It is also not clear whether the scope includes vibration impacts. As confirmed in the Proposed Development section of the EIA Scoping Report (paragraph 21), piling activities are expected and as such, the Applicant should consider scoping vibration impacts into the ES.
- 3.1.94. The proposed Methodology for the noise and vibration assessment is set out in paragraph 14. The general stages of the assessment process are noted (e.g. the identification of receptors; establishment of baseline conditions; assessment of effects); however, the order and scope of the assessment process is not entirely clear, noting that the “*predication and assessment of changes in noise levels*” only refers to operational plant noise. The Applicant should ensure that the ES presents the assessment methodology in a clear and methodical way.
- 3.1.95. The Cumulative Effects section states that the scope of the cumulative impact assessment will be “*in relation to demolition and construction as well as building services noise, and any other potential for new noise sources*”. It is noted that this doesn’t mention impacts associated with operational traffic. The cumulative assessment should cover the entire technical scope proposed for inclusion within the noise and vibration assessment, as agreed through the EIA Scoping process.
- 3.1.96. TFL have stated that they expect significant impacts to vehicular traffic in relation to construction access and that the construction access proposals should be considered as part of the air quality and noise and vibration assessments in the EIA. CBRE agree that the Applicant should consider construction access when modelling noise and vibration impacts from construction traffic. Paragraph 20 of Annex A confirms that the Demolition and Construction chapter, which will form the basis of the technical assessments, will include information on HGV routing and as such, it is assumed that the Applicant has already factored this within their assessment approach.
- 3.1.97. Subject to the comments above, the proposed approach to the Noise and Vibration ES chapter is considered acceptable. However, CBRE advise that the Applicant should consult with LB Camden’s EHO advisor in regard to key elements of the proposed methodology.

Socio-Economics

Consultation

- 3.1.98. The following responses have been received from the consultees in relation to The Proposed Development section of the EIA Scoping Report:
- Inclusive Economy Project Officer at LB Camden.

CBRE Review

- 3.1.99. This section sets out the proposed approach to the assessment of effects relating to socio-economics.
- 3.1.100. The Introduction section (paragraphs 1-3) summarises the scope of the socio-economic assessment; however, no reference is made to potential impacts and effects during the demolition and construction stage. This is considered to be an accidental omission given that the Potential Effects section proposes to scope in impacts relating to demolition and construction.
- 3.1.101. In respect of the above, it is also noted that the Methodology section does not go into any detail on the methodology proposed for the demolition and construction stage assessment. The ES will need to clearly set out the scope and methodology of the assessment, having regard to all potential impacts during the demolition and construction and completed development stages.
- 3.1.102. It would be useful to understand what is being considered as the existing baseline. Paragraph 8 includes “*existing uses on-site*” as a likely receptor. Based on the Site Location and Description section in the main EIA Scoping Report, it is assumed that the existing users on-site refers to the operational commercial properties at ground and first floor levels, including cafes and shops. However, clarification is sought as to whether this also includes the office floorspace which is understood to be vacant. As per previous comments provided in respect of the baseline position, it would be useful to understand how long the office floorspace has been vacant for and whether or not this is temporary / permanent. If the former, the Applicant should consider including the office floorspace in the baseline position to ensure the assessment is conservative and robust.
- 3.1.103. As noted in Section 3, the Inclusive Economy Project Officer has also set out a number of expectations for the proposed development once operational to ensure that the scheme delivers local employment benefits in the long term. Whilst the ES is not intended to demonstrate policy compliance, the ES should confirm what the Applicant is committing to and any commitments being made should be considered as part of the Socio-Economics assessment.
- 3.1.104.
- 3.1.105. Subject to the comments above, the proposed approach to the Socio-Economics ES chapter is considered acceptable.

Townscape, Visual and Built Heritage Assessment

Consultation

- 3.1.106. No consultee responses have been provided to CBRE in relation to this section of the EIA Scoping Report.

CBRE Review

- 3.1.107. This section sets out the proposed approach to the assessment of effects relating to townscape, visual and built heritage.

- 3.1.108. As discussed earlier in this report (see the commentary on the Site Location and Description and Environmental Context section), a Scheduled Monument is located approximately 500 m south west of the site, which has not been mentioned within the Townscape, Visual and Built Heritage Topic Sheet, nor shown in Figure 2. The Applicant should ensure that all sensitive receptors within the study area are considered within the ES.
- 3.1.109. Paragraph 15 confirms that the verified views will be selected in consultation with the LB of Camden. It would have been useful to include the proposed verified views within the EIA Scoping Report for relevant consultees to review and comment.
- 3.1.110. The assessment sequence set out for the Townscape and Visual and Built Heritage assessments, paragraphs 21 and 25 respectively, sets out that “*for effects that are moderate or major in scale also assess the nature (adverse, neutral or beneficial) of the effect*”. CBRE advise that the nature of the effect should be considered for all potential effects. Based on discussions with the Applicant, this is understood to be a typographical error.
- 3.1.111. Subject to the comments above, the proposed approach to the Townscape, Visual and Built Heritage Assessment is considered acceptable.

Traffic and Transport

Consultation

- 3.1.112. Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:
- TFL.

CBRE Review

- 3.1.113. This section sets out the proposed approach to the assessment of traffic and transport effects.
- 3.1.114. As mentioned earlier in the Air Quality and Noise and Vibration sections of this report, the Applicant has not clearly set out the baseline conditions for the site in respect of vehicular movements (i.e., will the baseline scenario be based on a vacant site with no operational vehicular movements or will the baseline scenario consist of the vehicular movements prior to the site becoming vacant). Based on the Scope of Assessment section (paragraphs 44 – 71), it is understood that the baseline scenario has factored in vehicle movements associated with the approximate 100 car parking spaces that currently exist on-site. The baseline conditions for the traffic data should be clearly set out in the ES, with clear justification provided as to why this is considered to be representative of a conservative, yet reasonable baseline scenario.
- 3.1.115. The Existing Baseline Data section refers to traffic surveys to be undertaken in April 2023. It is expected that these have now been completed and have been undertaken at an appropriate time (i.e. outside of school holidays). It is also noted that the assessment will use TFL traffic data from 2022. The Applicant should consider using 2023 data if available.

- 3.1.116. The Applicant has requested that TfL and LB Camden confirm which cumulative developments or highways schemes need to be considered as part of the future baseline scenario. CBRE agree with this approach and as part of this exercise, the Applicant, TfL and LB Camden should also discuss which cumulative developments and highway schemes are considered within the future baseline scenario and which are considered as part of the cumulative assessment scenario. In this regard, it is noted that High Speed 2 (HS2) is proposed to be considered as part of the future baseline, noting that “*services are expected to commence in the late 2020s*”. Given that there have been multiple delays to HS2 and the opening date is now anticipated to be around 2035/2040, the Applicant, in consultation with TfL and LB Camden, should consider whether HS2 should be assessed within the cumulative schemes assessment.
- 3.1.117. As requested in TFL’s response, a Construction Logistics Plan (CLP) should be included as part of the standalone Transport Assessment (TA). As stated in Paragraph 70 of the Transport Topic Sheet, it is understood that a CLP will be appended to the TA.
- 3.1.118. With respect to the above, it is noted that the traffic and transport assessment scenarios have not been clearly set out. However the Cumulative Effects section confirms that a cumulative effects scenario will be considered. The assessment scenarios should be clearly set out in the ES. As discussed in the Air Quality section of this report, we would typically expect the traffic and transport, air quality and noise and vibration assessments to be undertaken using the same assessment scenarios, as follows:
- Scenario 1: Existing Baseline;
 - Scenario 2: Future Baseline (with TEMpro growth);
 - Scenario 3: Future Baseline + Proposed Development; and
 - Scenario 4: Future Baseline + Proposed Development + Cumulative Schemes.
- 3.1.119. With regards to the cumulative effects assessment, paragraph 73 states that the cumulative schemes considered will include “*those nearby developments which have planning permission (or committee resolution to grant consent)*...” and then goes on to confirm that the assessment will also be subject to TA scoping discussions. CBRE agree that the cumulative schemes should be agreed through the TA scoping process; however, the cumulative effects assessment should also be based on those schemes agreed through the EIA scoping process. In this regard, it is noted that the cumulative schemes criteria in paragraph 73 differs from that presented in the Cumulative Effects Assessment section in Annex A of the EIA Scoping Report. The ES should consider the list of cumulative schemes as agreed through the EIA scoping process, clearly setting out which schemes have been included/excluded, as well as where any additional schemes that have been considered, as identified through the TA scoping process.
- 3.1.120. Subject to the comments above, the proposed approach to the Traffic and Transport ES chapter is considered acceptable.

Wind Microclimate

Consultation

- 3.1.121. No consultee responses have been provided to CBRE in relation to this section of the EIA Scoping Report.

CBRE Review

- 3.1.122. This section sets out the proposed approach to the assessment of wind microclimate effects.

- 3.1.123. The possible receptor locations to be considered within the wind microclimate assessment are presented in paragraph 7. It is noted that public terraces and balconies are considered as a potential on-site sensitive receptor but not an off-site sensitive receptor. The Applicant should also give consideration to any off-site balcony locations. The ES should make clear all possible receptor locations considered for the purpose of the wind microclimate assessment.
- 3.1.124. The Applicant is proposing to undertake wind tunnel testing of the existing site, proposed development and cumulative schemes for the assessment configurations set out in paragraph 26. It is also noted that a high-level Computational Fluid Dynamic (CFD) simulation will be undertaken during the design process and to inform the probe locations for wind tunnel testing. CBRE consider this approach to be acceptable based on the scale of the development.
- 3.1.125. Subject to the comments above, the proposed approach to the Wind Microclimate ES chapter is considered acceptable.

Annex E: Scoped Out Topic Sheets

- 3.1.126. Annex E of the EIA Scoping Report sets out the topics that the Applicant is proposing to scope out of the ES as discrete chapters. These are discussed below.

Archaeology

Consultation

- 3.1.127. The following consultee responses have been provided to CBRE in relation to this section of the EIA Scoping Report:
- Historic England.

CBRE Review

- 3.1.128. The Applicant proposes to scope out an assessment of Archaeology from the ES. The justification for scoping this topic out is presented in paragraphs 14 to 17 and is based upon the following: the site not being an APA, the formation of the existing basement on-site will have likely removed any archaeological remains, and the fact that the previous watching brief on-site recorded no archaeological features. Paragraph 18 also confirms that, depending on the exact scale and nature of any excavation and basement works, an archaeological watching brief may be required and would be secured by planning condition.
- 3.1.129. Having considered the proposals and information held in the Greater London Historic Environment Record (GLHER), Historic England agree that Archaeology should be scoped out of the ES.
- 3.1.130. It is noted that Paragraph 3 states that there are no Scheduled Monuments within the study area (a 500 m radius from the site). As discussed earlier in this report, Figure 3 of the main EIA Scoping Report shows a Scheduled Monument located approximately 500 m south west of the site.
- 3.1.131. Based on the above, CBRE are in agreement with the approach taken by the Applicant to scope Archaeology out of the ES.

Ecology and Biodiversity

Consultation

- 3.1.132. Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:
- Natural England;
 - Nature Conservation Officer at LB Camden; and
 - Tree and Landscape Officer at LB Camden.

CBRE Review

- 3.1.133. The Applicant proposes to scope out an assessment of Ecology and Biodiversity from the ES. The justification for scoping this topic out is presented in paragraphs 18 to 27 and is based on the findings of a Preliminary Ecological Appraisal (PEA), as presented in Annex G of the EIA Scoping Report.
- 3.1.134. The site visit to inform the PEA was undertaken in January 2023, which confirmed the site currently comprises buildings and hardstanding, ruderal, scattered trees (London Plan and common lime), introduced shrub and modified grassland. Whilst there was no evidence of previous years' nests or use by peregrine falcons during the site visit, it has been acknowledged that the site visit was undertaken outside of the bird nesting season. Based on the presence of potential suitable habitat on-site, the site is therefore considered to have low potential to support nesting birds and standard measures have been proposed to mitigate the risk of disturbing, injuring or killing nesting birds during demolition and construction works. The site has negligible potential to support all other protected species.
- 3.1.135. A Biodiversity Net Gain (BNG) assessment will be undertaken for the proposed development and will be submitted as a standalone report to support the planning application. Whilst not explicitly stated, it has been assumed that a minimum 10% BNG will be achieved on-site, as referred to in Annex G of the EIA Scoping Report.
- 3.1.136. As the proposals are not expected to impact on any designated sites under their jurisdiction, Natural England have not provided any specific comments on the EIA Scoping Report but have set out their standard advice within an annex to their letter.
- 3.1.137. The Nature Conservation Officer at LB Camden confirmed they are in agreement with the Applicant's decision to scope Ecology out of the ES.
- 3.1.138. In respect to the proposals for native street tree planting, the Tree and Landscape Officer at LB Camden have confirmed that *"any planting on the highway will require a viability assessment to ensure it is possible and consultation with TfL as Euston Road and Hamstead Road are red routes"*. The Applicant should factor in these comments in developing the landscaping proposals, which will inform the basis of the BNG assessment.
- 3.1.139. Based on the above, the proposed approach to scope out an assessment of Ecology and Biodiversity from the ES is considered acceptable.

Geoenvironmental

Consultation

- 3.1.140. Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:

- Contaminated Land Officer at LB Camden.

CBRE Review

- 3.1.141. The Applicant proposes to scope out a Geoenvironmental assessment from the ES. The justification for scoping this topic out is presented in paragraphs 16 to 32.
- 3.1.142. The site is considered to have a generally low potential for significant or widespread contamination when considering the existing and historic uses on-site and in the surrounding area and the fact that any contaminated Made Ground will have been removed during the excavation of the existing basement.
- 3.1.143. Should contamination be present, the Applicant outlines a number of potential effects related to ground conditions and contamination at the site. As discussed in paragraphs 16 to 32, a Preliminary Risk Assessment (PRA) will be undertaken to support the planning application and will identify the need for further site investigation and any remediation/risk management strategies as required. The Applicant has also confirmed that demolition and construction works will be undertaken in accordance with an approved Construction Environmental Management Plan (CEMP), which will include a watching brief for any contamination encountered during construction.
- 3.1.144. It is noted that the piled foundations are not anticipated to extend beyond the London Clay. However, the Applicant have confirmed that should deep piled foundations extend down into the principal chalk aquifer, a Foundation Works Risk Assessment (FWRA) will be undertaken pursuant to a planning condition.
- 3.1.145. It is noted that the site description refers to a site area of approximately 0.93 hectares, which is larger than the area presented in the main EIA Scoping Report. Whilst it is appreciated that this is an approximate, it is noted that there are a few inconsistencies in the EIA Scoping Report in respect of the site boundary shown. All reports which are submitted to support the planning application should be prepared/amended to be based on the redline boundary for the purpose of the planning application.
- 3.1.146. The Contaminated Land Officer at LB Camden confirmed they are in agreement with the Applicant’s decision to scope this topic out of the ES.
- 3.1.147. Based on the justification provided, CBRE are in agreement with the approach taken by the Applicant to scope Geoenvironmental out of the ES.

Human Health

Consultation

- 3.1.148. Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:
- Metropolitan Police.

CBRE Review

- 3.1.149. The Applicant proposes to scope out an assessment of Human Health from the ES. The justification for scoping this topic out is presented in Table 1.

- 3.1.150. Table 1 describes the potential impacts that may arise as a result of the proposed development in connection with the individual health determinates. The justification for scoping out Human Health from the ES has focused on demonstrating that no significant impacts would arise. For the majority of determinants of health, the justification is noted and accepted. However, in respect of Air Quality and Noise and Vibration, CBRE do not agree with the comment that significant effects are not likely, ‘with regards to health’, noting that the metric for assessing air quality and noise and vibration are based on health objectives. In this regard, these technical topics have been scoped into the ES as discrete chapters based on the fact that there could be significant effects. CBRE believe that the justification for scoping out these topics from Human Health should instead be placed on the fact that human health impacts will already be captured as part of the Air Quality and Noise and Vibration assessments, and a discrete Human Health chapter is not required. Each relevant technical chapter in the ES should clearly identify the human health considerations that are relevant to their respective assessment and the EIA Methodology ES Chapter should outline the general approach taken.
- 3.1.151. The response from the Metropolitan Police highlights some initial concerns with regards to crime in the area and provides some recommendations to be factored in the design of the proposed development. The Applicant should consider these comments during the design development process and should include commentary with ES Chapter 3: Alternatives and Design Evolution and Chapter 4: Proposed Development as to how risks from crime and anti-social behaviour have been mitigated. As requested by the Metropolitan Police, Chapter 4: Proposed Development should also confirm that the proposed development will achieve Secured by Design certification for all stages, to be secured by a planning condition.
- 3.1.152. Subject to the above, CBRE are in agreement with the approach taken by the Applicant to scope Human Health out of the ES as a discrete chapter.

Light Spill

Consultation

- 3.1.153. No consultee responses have been provided to CBRE in relation to this section of the EIA Scoping Report.

CBRE Review

- 3.1.154. The Applicant proposes to scope out an assessment of Light Spill from the ES. The justification for scoping this topic out is presented in paragraphs 7 to 9.
- 3.1.155. The justification provided is very brief and only focuses on residential receptors. While there are no apparent sensitive ecological receptors in the area, it would have been useful to confirm this.
- 3.1.156. Due to the scale and operation of the proposed development when compared to the existing building and the fact that considerate design features will be incorporated in the proposed development’s design, CBRE agree that the proposed development will unlikely result in unacceptable levels of light spill.
- 3.1.157. In Paragraph 6 when it states “*in the event that an assessment is required*” it is unclear whether the ‘assessment’ is required for the planning application or whether it will be secured via an appropriately worded planning condition. Given that a Light Spill assessment is proposed to be scoped out of the ES, the Applicant should clarify any commitments being made and how these will be secured, such that the local authority has confidence that no significant effects will arise.

3.1.158. Subject to the above, CBRE are in agreement with the approach taken by the Applicant to scope Light Spill out of the ES.

Project Vulnerability, Major Accidents and Disasters

Consultation

3.1.159. No consultee responses have been provided to CBRE in relation to this section of the EIA Scoping Report.

CBRE Review

- 3.1.160. The Applicant proposes to scope out an assessment of Project Vulnerability, Major Accidents and Disasters from the ES. The justification for scoping this topic out is presented in Table 1, which considers the major accidents and disasters listed in the London Risk Register which are relevant to the proposed development.
- 3.1.161. The proposed development would be unlikely to result in significant effects from most major accidents and natural disasters. The end use of the proposed laboratory space is not yet known; however, as mentioned in paragraph 6 and Table 1, the proposed development would comply with the relevant legislative and regulatory controls for laboratories, for which the proposed development is not expected to exceed the requirements of a Category 2 laboratory⁴. Paragraphs 13 to 17 set out the proposed mitigation measures which will be implemented in connection with the laboratory space such that the vulnerability of the proposed development to major accidents, hazards and natural disasters will be adequately managed throughout the lifetime of the project.
- 3.1.162. CBRE are in agreement with the approach taken by the Applicant to scope Project Vulnerability, Major Accidents and Disasters out of the ES.

Waste and Materials

Consultation

3.1.163. No consultee responses have been provided to CBRE in relation to this section of the EIA Scoping Report.

CBRE Review

- 3.1.164. The Applicant proposes to scope out an assessment of Waste and Materials from the ES. The justification for scoping out Materials and Waste is provided in paragraphs 2 to 10 and paragraphs 20 to 31, respectively.
- 3.1.165. Measures to be implemented during the demolition and construction stage to mitigate impacts relating to waste and materials will be set out within ES Chapter 5: Demolition and Construction and will be secured by condition. ES Chapter 5 will include an outline of the waste aspects of the CEMP, which “*may be supported by a Site Waste Management Plan (SWMP) and Circular Economy Statement (CES) which would also be prepared and implemented throughout the demolition and construction works pursuant to a planning condition/s*”.

⁴ His Majesty’s Stationary Office (2002) The Control of Substances Hazardous to Health Regulations 2002

- 3.1.166. In respect of the completed development stage, an Operational Waste Management Strategy (OWMS) will be prepared and implemented as part of the proposed development, which will set out how each waste stream will be managed.
- 3.1.167. Subject to the above, CBRE are in agreement with the approach taken by the Applicant to scope Waste and Materials out of the ES provided that sufficient information is provided in the ES to demonstrate how waste and materials has been minimised.

Water Resources, Drainage and Flood Risk

Consultation

- 3.1.168. Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:
- Thames Water; and
 - Environment Agency.

CBRE Review

- 3.1.169. The Applicant proposes to scope out an assessment of Water Resources, Drainage and Flood Risk from the ES. The justification for scoping out this topic from the ES is provided in paragraphs 13 to 29.
- 3.1.170. The Applicant will be submitting the following standalone reports to accompany the planning application:
- Flood Risk Assessment (FRA), due to the site’s location within a critical drainage area (CDA);
 - Basement Impact Assessment (BIA); and
 - Utilities Assessment.
- 3.1.171. As discussed in the Demolition and Construction Works section, the Applicant will also implement a number of pre-commencement measures and measures during the enabling and construction works to mitigate impacts to water resources. In this regard, paragraph 16 confirms that the BIA will discuss mitigation measures with a view to maintaining groundwater quality, referring the reader to the measures set out in Demolition and Construction Works section. However, this section does not appear to capture measures to address the potential for groundwater ingress during the demolition and construction stage. Due to the proximity of areas with increased susceptibility to elevated groundwater, CBRE would expect to see dewatering as a possible mitigation measure, if determined necessary through the BIA. CBRE consider the success of dewatering cannot be guaranteed and as such potential significant impacts associated with groundwater ingress cannot be ruled out. The findings of the BIA should be used to inform the inclusion of this topic within the ES and the details of any suitable mitigation measures should be presented in ES Chapter 5: Demolition and Construction.
- 3.1.172. As per previous comments made on the EIA Scoping Report, the redline boundary shown in Figure 1 is incorrect and does not capture the full extent of the site. The ES should be based on the final redline boundary used for the planning application.
- 3.1.173. Thames Water and the EA have not provided any specific comments on the EIA Scoping Report but have set out their standard advice within their letter.

- 3.1.174. Based on the above, the decision to scope this topic out of the ES should be reviewed upon receipt of the BIA and once the Applicant has further information on the extent of the basement works in relation to the groundwater level.

Annex F: Archaeological Desk Based Assessment

- 3.1.175. Annex F of the EIA Scoping Report comprises the Archaeological Desk Based Assessment (DBA) undertaken of the site in March 2023. The findings of the Archaeological DBA have been used to inform the proposed approach to scope Archaeology out of the ES, as presented within the topic sheet in Annex E of the EIA Scoping Report.
- 3.1.176. It is noted that the site description refers to a site area of approximately 0.93 hectares, which is larger than the area presented in the main EIA Scoping Report. Whilst it is appreciated that the site redline may not have been fixed at the time the DBA was undertaken, the Applicant should ensure all reports which accompany the planning application show the correct redline boundary.
- 3.1.177. As set out in Annex E of the EIA Scoping Report, mitigation may comprise an archaeological watching brief during the excavation and basement works. As confirmed in Annex F, any archaeological work would need to be undertaken in accordance with an approved written scheme of investigation.
- 3.1.178. Based on the findings presented in the Archaeological DBA, CBRE are in agreement with the Applicant’s proposed approach to scope Archaeology out of the ES.

Annex G: Preliminary Ecological Appraisal

- 3.1.179. Annex G of the EIA Scoping Report comprises the Preliminary Ecological Appraisal (PEA) undertaken of the site early 2023. The findings of the PEA have been used to inform the proposed approach to scope Ecology and Biodiversity out of the ES, as presented within the topic sheet in Annex E of the EIA Scoping Report.
- 3.1.180. Based on the findings presented in the PEA, the proposed approach to scope out an assessment of Ecology and Biodiversity from the ES (as discussed earlier in this report) is considered acceptable.

4. Summary and Conclusions

- 4.1.1. The Sustainability, Impact Assessment & Social Value team at CBRE Limited (‘CBRE’) has been commissioned by the London Borough of Camden (LB Camden) to provide independent advice in relation to the Scoping Report for the proposed redevelopment of a site located at 286 Euston Road, within the London Borough of Camden.
- 4.1.2. The purpose of this document is to report the outcome of CBRE’s review of the EIA Scoping Report, prepared by Trium (August 2023), and provide commentary suitable for inclusion in LB Camden’s EIA Scoping Opinion.
- 4.1.3. The outcome of CBRE’s review of the proposed EIA approach is set out in Chapters 2 and 3 of this report. The review takes into account comments provided by the statutory consultees. Where an alternative approach to the EIA has been recommended, this is clearly set out under each technical topic heading.
- 4.1.4. The EIA Scoping Report is broadly considered to meet the necessary regulatory requirements subject to the comments raised within this report.

Appendix A: Consultation Responses

From:
Sent: 09 August 2023 11:44
To: Planning Planning
Subject: 3rd Party Planning Application - 2023/3265P

London Borough of Camden
Camden Town Hall
Argyle Street
Euston Road
London
WC1H 8EQ

Our DTS Ref: 74810
Your Ref: 2023/3265P

9 August 2023

Dear Sir/Madam

Re: Euston Tower, 286 Euston Road, London, NW1 3DP

Waste Comments

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Water Comments

Thank you for giving Thames Water the opportunity to comment on the above application. Thames Water are the statutory water and sewerage undertaker for the area and would like to make the following comments: The EIA Regulations 2017 set out in Schedule 4 that water and wastewater issues may need to be covered in an EIA. Thames Water considers the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met. 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 3. The developments demand for water supply and network infrastructure both on and off site and can it be met. 4. Build – out/ phasing details to ensure infrastructure can be delivered ahead of occupation. 5. Any piling methodology and will it adversely affect neighbouring utility services. The developer can obtain information to support the EIA by visiting the Thames Water website <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Yours faithfully
Development Planning Department

Thames Water Limited (company number 2366623) and Thames Water Utilities Limited (company number 2366661) are companies registered in England and Wales, both are registered at Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB. This email is confidential and is intended only for the use of the person it was sent to. Any views or opinions in this email are those of the author and don't necessarily represent those of Thames Water Limited or its subsidiaries. If you aren't the intended recipient of this email, please don't copy, use, forward or disclose its contents to any other person – please destroy and delete the message and any attachments from your system.

creating a better place



Kate Henry
1 Pancras Square
London
N1C 4AG

Our ref: NE/2023/136065/01
Your ref: 2023/3265/P
Date: 11 August 2023

Dear Kate,

Euston Tower, 286 Euston Road, London, NW1 3DP

Request for scoping opinion under regulation 15 of the town and country planning environmental impact assessment (EIA) regulations 2017, for proposed development involving the partial demolition of the existing building (retention of central core, basement and foundations) and erection of a 32 storey building (mixed use including office floorspace, lab-enabled floorspace and flexible retail floorspace), alterations to existing basement, improvements to public realm surrounding the building.

Thank you for consulting us on the above application on the 8th of August.

Environment Agency Position

Based on the information currently available, the development raises no environmental concerns for us. We do have the following advice for the applicant.

Water Resources

Increased water efficiency for all new developments potentially enables more growth with the same water resources.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

Commercial/Industrial developments

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

We also recommend you contact Camden planning authority for more information.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Cont/d..



Should you have any queries regarding this response, please contact me.

Yours sincerely,

Tanzin Ferdous

Planning Advisor, Hertfordshire and North London Sustainable Places

Email: HNL.SustainablePlaces@environment-agency.gov.uk

Mobile: 07407828626

From: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>

Sent on: Wednesday, August 16, 2023 4:30:48 PM

To: Kate Henry <Kate.Henry@camden.gov.uk>

Subject: RE: Consultee letter for PlanningApplication Application: 2023/3265/P

Good afternoon Kate,

Application No: 2023/3265/P

Site address: Euston Tower 286 Euston Road London NW1 3DP

Proposal: Request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the partial demolition of the existing building (retention of central core, basement and foundations) and erection of a 32 storey building (mixed use including office floorspace, lab-enabled floorspace and flexible retail floorspace), alterations to existing basement, improvements to public realm surrounding the building.

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application except that the developer should consider the potential of introducing new water paths around London Underground infrastructure or tunnel due to the proposal.

Further comments/conditions will be provided at full planning application stage.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Tom Li

Safeguarding Engineer (LU+DLR) | Infrastructure Protection

5 Endeavour Square | 7th Floor Zone B | Westfield Avenue | E20 1JN



-----Original Message-----

From: Kate Henry <Kate.Henry@camden.gov.uk>

Sent: 08 August 2023 13:54

To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>

Subject: Consultee letter for PlanningApplication Application: 2023/3265/P

Please find attached Consultee letter for PlanningApplication application 2023/3265/P

Y620361

This e-mail may contain information which is confidential, legally privileged and/or copyright protected. This e-mail is intended for the addressee only. If you receive this in error, please contact the sender and delete the material from your computer. See our new Privacy Notice here<<http://www.camden.gov.uk/privacystatement>> which tells you how we store and process the data we hold about you and residents.

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Transport for London



planning@camden.gov.uk
London Borough of Islington
Planning Applications Team
Planning and Development
PO Box 3333
222 Upper Street
London N1 1YA

Transport for London
Crossrail 2
Safeguarding Manager
5 Endeavour Square
LONDON
E20 1JN

Phone: 020 3054 7018
www.TfL.gov.uk

18 August 2023
Crossrail 2 Ref: CR2-4777-2023

Dear Kate Henry,

2023/3265/P : Euston Tower, 286 Euston Road, London , NW1 3DP

Request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the partial demolition of the existing building (retention of central core, basement and foundations) and erection of a 32 storey building (mixed use including office floorspace, lab-enabled floorspace and flexible retail floorspace), alterations to existing basement, improvements to public realm surrounding the building.

Transport for London administers the Crossrail 2 Safeguarding Direction made by the Secretary of State for Transport on 24 March 2015.

Regarding your letter dated 08 August 2023, requesting the views of the Crossrail 2 Project Team on the above application. I confirm that the application relates to land within the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction.

The site falls with the Limits of Safeguarding for Crossrail 2.

TfL has no comment to make from a Crossrail 2 perspective in response to the EIA scoping request. In the event future applications for planning permission are submitted to the Local Planning Authority which propose or imply works more than 3 metres below ground level, an increase in height or floor area for this site consultation on that application must include Transport for London to prevent planning permission being granted for development that might be prejudicial to the subsequent delivery of Crossrail2.

The latest project developments can be found on the Crossrail 2 website www.crossrail2.co.uk.

I hope this information is helpful, but if you require any further information or assistance then please feel free to contact a member of the Safeguarding Team by email to crossrail2@tfl.gov.uk.

Yours sincerely,

Michael Johnson
Safeguarding Manager

MAYOR OF LONDON



VAT number 756 2770 08

From: Kate Henry <Kate.Henry@camden.gov.uk>
Sent on: Thursday, September 14, 2023 9:05:26 AM
To: Raby-Smith, Rebecca @ London SMC <Rebecca.RabySmith@cbre.com>
Subject: FW: 2023/3265/P; Euston Tower 286 Euston Road London; CMDN/20/30

External

FYI – response from TFL Spatial Planning.

--
Kate Henry
Principal Planning Officer

Telephone: 020 7974 3794



From: Michael Welch <MichaelWelch@tfl.gov.uk>
Sent: 13 September 2023 10:36
To: Kate Henry <Kate.Henry@camden.gov.uk>
Cc: Planning Planning <Planning@camden.gov.uk>
Subject: 2023/3265/P; Euston Tower 286 Euston Road London; CMDN/20/30

TfL Spatial planning reference: CMDN/20/30

Borough reference: 2023/3265/P

Location: Euston Tower 286 Euston Road London NW1 3DP

Proposal: Request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the partial demolition of the existing building (retention of central core, basement and foundations) and erection of a 32 storey building (mixed use including office floorspace, lab-enabled floorspace and flexible retail floorspace), alterations to existing basement, improvements to public realm surrounding the building.

Dear Kate

Thanks for consulting TfL on this application for which we have the following comments. We note that Traffic and Transport are proposed to be scoped into the EIA, and there will be a Transport Assessment (TA) as a standalone planning deliverable. A Construction Logistics Plan should be included as part of this standalone planning deliverable.

We are currently engaging on the emerging proposals via our TfL Pre-application services. You can direct further inquiries about the site to the new case officer Mike Welch (mike.welch@tfl.gov.uk)

We expect significant impacts from construction access on pedestrians, cyclists, public transport passengers and vehicular traffic in the local area. Construction access proposals should therefore be considered as part of the air quality and noise and vibration assessments in the EIA. Cumulative future construction traffic flows on local roads including from HS2 at Euston interchange should also be assessed.

Aside from this the EIA Scoping Opinion document submitted is satisfactory and we have no detailed comments or objections.

Kind regards

Michael Welch | Area Planner (Spatial Planning) | TfL City Planning
Transport for London | 9th Floor, 5 Endeavour Square, Westfield Avenue, E20 1JN
Telephone number: ~~020 3054 4557 (auto 84557)~~
Email: michaelwelch@tfl.gov.uk

We have recently made changes to our pre-application service and charges, and introduced a new Initial Screening process. For more info please visit: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

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Date: 14 August 2023
Our ref: 445320
Your ref: 2023/3265/P

Ms K Henry
London Borough of Camden
Town Hall
Judd Street
London WC1H 9JE

BY EMAIL ONLY
planning@camden.gov.uk

Dear Ms Henry

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): Request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the partial demolition of the existing building (retention of central core, basement and foundations) and erection of a 32 storey building (mixed use including office floorspace, lab-enabled floorspace and flexible retail floorspace), alterations to existing basement, improvements to public realm surrounding the building.

Location: Euston Tower 286 Euston Road London NW1 3DP

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 08 August 2023 and received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely

Mrs Sally Ireland
Consultations Team



Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Annex A – Natural England Advice on EIA Scoping

General Principles

[Schedule 4](#) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors)
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on [environmental assessment](#) and [natural environment](#).

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General principles

The [National Planning Policy Framework](#) (paragraphs 174-175 and 179-182) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a [duty](#) to have regard to conserving biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available [here](#).

Designated nature conservation sites

International and European sites

European site conservation objectives are available at <http://publications.naturalengland.org.uk/category/6490068894089216>

The ES should thoroughly assess the potential for the proposal to affect nationally and internationally designated sites of nature conservation importance, including marine sites where relevant. European sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). In addition paragraph 181 of the National Planning Policy Framework (NPPF) requires that potential SPAs, possible SAC, listed or proposed Ramsar sites, and any site identified or required as compensatory measures for adverse effects on habitat (European) sites, potential SPAs, possible SACs and listed or proposed Ramsar sites have the same protection as classified sites (NB. sites falling within the scope of regulation 8 of the Conservation of Habitats and Species Regulations 2017 are defined as 'habitats sites' in the NPPF). Under Regulation 63 of the Habitats Regulations, an appropriate assessment must be undertaken in respect of any plan or project which

is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are qualifying features of the site, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a designated site, for example by being linked hydrologically or geomorphologically.

Should a likely significant effect on a European/Internationally designated site be identified (either alone or in-combination) or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an appropriate assessment in addition to the consideration of impacts through the EIA process. Further guidance is set out in Planning Practice Guidance on appropriate assessment <https://www.gov.uk/guidance/appropriate-assessment>

This should also take into account any agreed strategic mitigation solution that may be being developed or implemented in the area to address recreational disturbance, nutrients, or other impacts.

All queries in relation to the application of this methodology to specific applications or development of strategic solutions will be treated as pre-application advice and therefore subject to chargeable services.

Designated nature conservation sites

The proposal is unlikely to adversely impact any European or internationally designated nature conservation sites (including 'habitats sites' under the NPPF) or nationally designated sites (Sites of Special Scientific Interest, National Nature Reserves or Marine Conservation Zones).

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 174 and 175). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact

assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A [DLL scheme for GCN](#) may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

Biodiversity net gain

Paragraph 174 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

The ES should use an appropriate biodiversity metric such as [Biodiversity Metric 3.0](#) together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

Landscape

Nationally Designated Landscapes

Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A (2) of the National Parks and Access to the Countryside Act 1949 for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). [Planning Practice Guidance](#) confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Consideration should be given to the direct and indirect effects on this designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.

The development site is within the [Click here to enter text](#). Heritage Coast. Heritage Coasts are protected under paragraph 178 of the NPPF. The ES should set out the impacts on the Heritage Coast and opportunities for enhancement.

Landscape and visual impacts

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change

and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best

and most versatile (BMV) agricultural land should be considered in line with paragraphs 174 and 175 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 211 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and

The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) ^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. Further information can be obtained from the Local Planning Authority.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the [Committee on Climate Change's \(CCC\) Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme \(NAP\)](#), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's [Nature Networks Evidence Handbook](#) (2020) also provides extensive information on planning and delivering nature networks for people

and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the British Ecological Society's [nature-based solutions report](#) (2021) provide further information.

Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.



Historic England

Ms Kate Henry
London Borough of Camden
5 Pancras Square
London
NIC 4AG

Your Ref: 2023/3265/P
Our Ref: 215936

Contact:
Louise Davies
02079733740
louise.davies@historicengland.org.uk

2023-08-20

Dear Ms Henry,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2021**

Euston Tower 286 Euston Road London NW1 3DP

Request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the partial demolition of the existing building (retention of central core, basement and foundations) and erection of a 32 storey building (mixed use including office floorspace, lab-enabled floorspace and flexible retail floorspace), alterations to existing basement, improvements to public realm surrounding the building.

Recommend Archaeology Scoped OUT of EIA

Thank you for your consultation received on 2023-08-08.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration.

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. I agree with the outcome of the Trium Scoping Opinion report (July 2023) that archaeology should be scoped out of the ES.

No further assessment or conditions are therefore necessary.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Louise Davies

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



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Ms Kate Henry
London Borough of Camden
Development Management
Town Hall
Judd Street
London
WC1H 9JE

Direct Dial: 020 7973 3762

Our ref: PL00793728

Your ref: 2023/3265/P

25 August 2023

Dear Ms Henry

**RE. EUSTON TOWER, 286 EUSTON ROAD, LONDON NW1 3DP
ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT**

Thank you for your letter of 8 August 2023 consulting us about the above EIA Scoping Report.

The existing tall building on the site appears in the setting of a number of designated heritage assets. The proposed scheme is still in development, but the total height is described as 'not materially taller' than the existing building; this does not preclude changes in bulk, massing, articulation or materiality. This development could therefore have an impact, which may be greater, reduced, or different in nature, upon designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

We would strongly recommend that you involve the Heritage and Conservation Officer of the London Borough of Camden and the archaeological staff at Historic England's Greater London Archaeological Advisory Service in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise

potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Given the height of the structure associated with the proposed development and the surrounding topography and urban context, this development will be visible across a large area and could, as a result, affect the significance of heritage assets at some distance from this site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. It is important that the assessment is designed to ensure that all impacts are fully understood, potentially involving the use of section drawings and techniques such as photomontages.

The Townscape, Visual and Built Heritage Assessment Topic Sheet in Annex D explains that the impact on some heritage assets are expected to be similar that of the present building because the proposed new development is comparable in height to the existing building. Therefore, detailed assessments of impact on some heritage assets within the main 500m diameter study area are not proposed. This may be a proportionate approach, but will depend on the degree to which the development deviates in design, massing, and materiality, as well as height, from the current building. We are glad to note the inclusion of some sensitive heritage assets outside the primary study area, including Regent's Park, a Grade I Registered Park and Garden, and highly graded assets within it.

We are glad to note that Historic England's Good Practice Advice Note 3, 'The Setting of Heritage Assets' is noted in the scoping report as forming part of the basis for assessment of setting impacts. We recommend that Historic England's updated advice in 'Tall Buildings: Historic England Advice Note 4' (2022) also informs the assessment of the scheme and its impacts.

The Townscape and Visual Impact Assessment topic summary on page 9 of the report and the Townscape, Visual and Built Heritage Assessment Topic Sheet in Annex D refer to the development appearing in two LVMF Panoramas and one LVMF river prospect. It should be particularly noted that the development will appear - as does the current building - within the protected vista, and in part within the landmark viewing corridor, for LVMF view 2A.2 Parliament Hill to Westminster. Changes in massing or materiality could potentially have an impact on the prominence of the Palace of Westminster in this view, and this should be assessed in the Environmental Statement.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.



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assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

These comments should be read alongside the separate correspondence from Historic England's Greater London Archaeological Advisory Service on the scoping out of archaeology from these proposals.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

Kathy Clark
Inspector of Historic Buildings and Areas
Kathy.Clark@HistoricEngland.org.uk

cc:

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Phone: 020 7974 4444

planning@camden.gov.uk
www.camden.gov.uk/planning

Application ref: 2023/3265/P

Associated ref:

Contact: Kate Henry

Tel: 020 7974 3794

Email: Kate.Henry@camden.gov.uk

Date: 8 August 2023

Nature Conservation and Biodiversity (Statutory)
Protected Species Survey
5 Pancras Square
INTERNAL

Dear Sir/Madam

Town and Country Planning Act 1990 (as amended)
CONSULTATION

Address:

Euston Tower
286 Euston Road
London
NW1 3DP

The Proposed Work:

Request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the partial demolition of the existing building (retention of central core, basement and foundations) and erection of a 32 storey building (mixed use including office floorspace, lab-enabled floorspace and flexible retail floorspace), alterations to existing basement, improvements to public realm surrounding the building.

[Click here to go to Planning Online Search](#) and view the site plans and documentation. If you need printed copies please contact the Case Officer

If you wish to comment, please attach your report to the MVM record using DocGen within 21 days from the date of this letter.

In addition, do you know you can receive email alerts for planning and licensing applications as they happen in your local area? If you would like to receive these please register by going through the following steps.

- 1) Visit www.camden.gov.uk/planning
- 2) Scroll down the page and click on the link 'sign up for email alerts'
- 3) This page will provide you with the option to register your email address to receive email alerts for planning and licensing applications in your local area

Yours faithfully

Kate Henry
Supporting Communities Directorate

Share

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1x response - Council...MSG

3 / 18

From: Nature Conservation <NatureConservation@camden.gov.uk>
Sent on: Friday, August 11, 2023 11:09:37 AM
To: Kate Henry <Kate.Henry@camden.gov.uk>
Subject: FW: Consultee letter for PlanningApplication Application: 2023/3265/P

Follow up:

 Hi Kate,
M3DDE78.DOC

I've had a look at this and agree that Ecology can be scoped out of the EIA.

Greg

-----Original Message-----
From: Kate Henry <Kate.Henry@camden.gov.uk>
Sent: 08 August 2023 13:54
To: Nature Conservation <NatureConservation@camden.gov.uk>
Subject: Consultee letter for PlanningApplication Application: 2023/3265/P

Please find attached Consultee letter for PlanningApplication application 2023/3265/P

Y620361

From: Kate Henry <Kate.Henry@camden.gov.uk>
Sent on: Thursday, September 21, 2023 10:59:43 AM
To: Raby-Smith, Rebecca @ London SMC <Rebecca.RabySmith@cbre.com>
Subject: FW: REMINDER FW: Consultee letter for PlanningApplication Application: 2023/3265/P

External

Hi,

FYI, comments from Camden's Tree and Landscape Officer.

Kate Henry
Principal Planning Officer

Telephone: 020 7974 3794

From: Nick Bell <Nick.Bell@camden.gov.uk>
Sent: 21 September 2023 11:48
To: Kate Henry <Kate.Henry@camden.gov.uk>
Subject: RE: REMINDER FW: Consultee letter for PlanningApplication Application: 2023/3265/P

Hi Kate,

Not a huge amount for me to comment on.

- The Ecology and Biodiversity topic assessment states the scheme will involve the "Retention of existing trees as well as native street tree planting;". Any planting on the highway will require a viability assessment to ensure it is possible and consultation with TfL as Euston Road and Hampstead Road are red routes.

Please let me know if you want more detail.

Thanks

Nick Bell
Tree and Landscape Officer

Telephone: 020 7974 5939
-----Original Message-----
From: Kate Henry <Kate.Henry@camden.gov.uk>
Sent: 13 September 2023 09:52
To: Nick Bell <Nick.Bell@camden.gov.uk>
Subject: REMINDER FW: Consultee letter for PlanningApplication Application: 2023/3265/P
Importance: High

Good morning,

The 5 week statutory period for adopting a scoping opinion has ended, but CBRE cannot complete their scoping review report until they have all consultee responses. Would you be able to provide a response within 7 days of this email?

I look forward to hearing from you.

Kate Henry
Principal Planning Officer

Telephone: 020 7974 3794

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Y620361

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Y620361

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**ENVIRONMENTAL HEALTH
SUPPORTING COMMUNITIES**

To:	Kate Henry
From:	Melanie Lipsham (Acting Contaminated Land Officer)
Date:	21/09/2023
Address:	Euston Tower 286 Euston Road London NW1 3DP
Proposal:	Request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the partial demolition of the existing building (retention of central core, basement and foundations) and erection of a 32 storey building (mixed use including office floorspace, lab-enabled floorspace and flexible retail floorspace), alterations to existing basement, improvements to public realm surrounding the building.
Reference:	2023/3265/P
Key Points:	Scoping Request – agree contaminated land assessment to accompany the proposed planning application.

ENVIRONMENTAL HEALTH OBSERVATIONS

PART 1

The following documents were reviewed in preparation of the comments below:

- TRIUM Euston Tower Request for an EIA Scoping Opinion, July 2023

Summary

The site is currently occupied by Euston Tower. It is understood the proposed development includes demolition of the majority of the existing structure on-site, with retention and re-use of the central core elements, basement and foundations, and the construction of a new mixed-use development including office floorspace, laboratory enabled and flexible retail floorspace.

Historically, our records indicate unknown industrial land uses, a garage, printing works, oil and colour storage, hatters and cabinet makers were all present on/in the vicinity of the site.

According to our contaminated land risk characterisation, land on which the former industrial processes/activities were carried out is considered to represent a low to medium risk of contamination. It is possible that such land could exhibit significantly elevated contaminant levels with the potential to cause harm,

although the Council has no present evidence that confirms that there are contamination issues affecting the application site other than former potentially contaminative land-uses in the vicinity of the site.

The Scoping Request confirms geoenvironmental impacts have been scoped out of the ES (i.e., considered unlikely to result in significant effects on the environment). It is agreed the development is not considered to pose an unacceptable risk, given the site is proposed for commercial end use, with a basement beneath the site. However, the scope does indicate a Phase 1 Ground Conditions Report will be submitted as a standalone planning deliverable as part of the Planning Application, and hence a risk assessment should be completed as part of this report (given the potentially contaminative land uses in the vicinity of the site) and submitted to the LA for approval at that stage.

We will comment on the full planning application when it is submitted, and review the phase I report when available.

Sincerely,

Melanie Lipsham MESci C.WEM (Acting Contaminated Land Officer, LB Camden)



Kate Henry
Regeneration and Planning
London Borough of **Camden** 2nd Floor,
5 Pancras Square

Design Out Crime Office
North West DOCO Office,
Ruislip Police Station,
The Oaks,
Ruislip,
HA4 7LE
Telephone: 0208 7333703
Email:
DOCOMailbox.NW@met.pnn.police.
uk
www.met.police.uk
Your ref: 2023/3265/P
Our ref: NW 7547
(18/09/2023)

Good morning,

Thank you for allowing me to comment on the **request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the partial demolition of the existing building (retention of central core, basement and foundations) and erection of a 32 storey building (mixed use including office floorspace, lab-enabled floorspace and flexible retail floorspace), alterations to existing basement, improvements to public realm surrounding the building.**

I have not had a previous meeting with the applicant or architects in relation to this proposed development, as such my comments will be **general to the area** as befits a scoping opinion.

Should permission be granted for this development, I would ask for buildings to obtain Secured by Design certification via early engagement, for the following reasons.

Crime trends:

The proposed location makes up the South East corner of Regents Place. Euston Tower is bordered by Euston Road to the South and Hampstead Road to the East. It is in close proximity to Euston station as well as the tube stations of Warren Street and Euston Square. There is a higher than average street population around this area which can often experience higher rates of ASB and crime. Regents Place has an independent security team which works 24/7. The team are effective in reducing the crime rate and levels of antisocial behaviour both of which are material considerations for this proposal, as seen from current crime figures. This area comes under the ward of Regents Park. The top reported crimes for this ward for the Month of July 2023 (taken from the police UK website) were antisocial behaviour, violence and sexual offences, other theft and theft from person. Other offences of note for this ward include public order, shoplifting and drugs.

Top reported crimes

Most commonly reported crimes during Jul 2023

Anti-social behaviour	88
Violence and sexual offences	54
Other theft	46
Theft from the person	36

The graphic above is for the most commonly reported crimes for Haverstock ward. The figures have been taken from the Police UK website. The theme of the crimes are consistent on a month by month basis going back to 2022.

The location is just to the North of Warren Street station where I conducted a visual audit within the last two (2) years regarding antisocial behaviour around rough sleeping, street drinking, littering and public urination. Regent's place also houses high profile companies that can be susceptible to other forms of crime and disorder. Ensuring the site has good natural surveillance and legitimate activity will be vital to ensure an antisocial element does not take hold. A secure by design condition can assist in supporting this.

Crime and ASB as material considerations for this site:

The scoping report makes several references to potential receptors which may be impacted by the proposed development and may need to be considered as part of the assessment. Two of the receptors are directly relevant to crime and disorder: Socio-economics and Health. Crime and disorder are relevant considerations and need to be addressed. In socio-economic terms, the current crime trends in this area can have a negative impact upon the quality of life for both residents and businesses and could continue to do so for future residents and workers on this proposed site. **The health impact assessment needs to be viewed but crime reduction and community safety should be an important determinant to health.** In effect, a safe development with low rates of crime and ASB will also have a healthier and happier community which will be less worried about crime and the fear of crime and will not be exposed to its side effects.

Initial concerns from the site:

There are several concerns for this proposed outline.

- Separation of public realm, commercial and office/lab space will be key (within the building). There should be no areas of crossover that could lead to potential conflict.
- Landscaping to provide clear access routes with excellent lines of sight. Visibility lowers the fear of crime. There should be no opportunities for concealment which could increase the risk of robbery, burglary and theft. Concealment also includes the stashing of weapons, drugs and other illicit items.
- Lighting will also be important within this development and externally should meet BS 5489-1 2020. Any lighting need to complement the existing or any proposed CCTV system

Other considerations:

- Compartmentation will be key to mitigating the risk of anti-social behaviour and acquisitive/opportunistic crime. Drugs are also a key issue for the borough of Camden and the

development must not become a kindly habitat for gangs to enter and take control. It is noted that this area has the added benefit of a security team that patrols the environs and actively monitors CCTV.

- With the possibility of lab space it must be acknowledged that (dependant on the company and lab usage) protests may occur. Consider an area for this to be facilitated which will have the least impact upon other buildings/businesses as well as road users and pedestrians.
- There is already a large night time economy for the borough of Camden and this could overspill into the new development

Similar developments within Camden:

Mount Pleasant, Morrison's Chalk Farm, Agar Grove and Bacton Low Rise). All have benefited from the advice of Met Police design out crime officers and achieved Secured by Design certification. The proposed site should be no different and should be conditioned to achieve SBD certification. (The above developments are focused around residential but also have mixed uses).

I therefore propose that crime and disorder are material considerations for this site as described within the scoping report. These concerns can be allayed by the council agreeing to a condition for the development to achieve Secured by Design certification for all phases prior to occupation including residential, commercial and educational areas, to be maintained in line with SBD certification thereafter. This will require ongoing engagement at an early stage of each phase between the designing out crime officer and the development team.

The NPPF and Camden's own local guidance can support this proposal:

Section 91 of the NPPF states:

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which..

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;....."

Section 127 of the NPPF further adds:

Planning policies and decisions should ensure that developments..

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience"

Taken from the Camden Supplementary Guide to Design (January 2021 revision)

- *The Council requires that developments demonstrate that they have been designed to contribute to community safety and security.*
- *Security features must be fully considered and incorporated at an early stage in the design process.*
- *Designing-against crime features, safe access and security measures must complement other design considerations and be considered as part of a holistic approach to designing and maintaining safer environments for all.*
- *Better designed environments support safer and healthier communities.*
- *Consideration will be given to the impact of measures on the surrounding area to ensure that there is not displacement of activity into surrounding neighbourhoods.*
- *Safer environments support healthier communities.*

In accordance with Local Plan Policy C5 Safety and Security, the Council will require applicants to demonstrate that all impacts of their proposal on crime and community safety have been considered and addressed. Applicants should be able to demonstrate that they have consulted Met Police Designing Out Crime Officer (details of which can be found at www.securedbydesign.com) and that proposals take into account the advice given and achieve Secured by Design certification, where appropriate.

Policy C5 Safety and security (From the Camden Local Plan)

The Council will aim to make Camden a safer place. We will:

- (a) work with our partners including the Camden Community Safety Partnership to tackle crime, fear of crime and antisocial behaviour;*
- (b) Require developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime, such as Holborn and Covent Garden, Camden Town with Primrose Hill and Bloomsbury;*
- (c) Require appropriate security and community safety measures in buildings, spaces and the transport system;*
- (d) Promote safer streets and public areas;*
- (e) Address the cumulative impact of food, drink and entertainment uses, particularly in Camden Town, Central London and other centres and ensure Camden's businesses and organisations providing food, drink and entertainment uses take responsibility for reducing the opportunities for crime through effective management and design; and*
- (f) Promote the development of pedestrian friendly spaces.*

We strongly encourage security features to be incorporated into a scheme from the beginning of the design process and complement other key design considerations. Internal security measures are preferred. Further information on designing safer environments is set out in our supplementary planning document Camden Planning Guidance on design.

It is important to take a proactive approach at an early stage to reduce risks and opportunities for crime and ASB to occur, rather than relying on reactive measures such as

CCTV, which should only be used as part of a package of measures to reduce crime. Incorporating designing out crime features into a development should complement other key design considerations and high quality architecture and design should still be achieved.

Considering good design early in the design process will lead to a better quality development overall.

The design of streets, public areas and the spaces between buildings needs to be accessible, safe and uncluttered. Careful consideration needs to be given to the design and location of any street furniture or equipment in order to ensure that they do not obscure public views or create spaces that would encourage antisocial behaviour. The use of the site and layout should also be carefully considered as these can also have a major impact on community safety.

From the Camden local plan;

"Camden's food, drink and licensed entertainment premises contribute to the attractiveness and vibrancy of the borough but, where there is a concentration of late night activity, there can also be problems such as noise and disturbance, littering, antisocial behaviour, crime and violence. The cumulative impact of these uses will therefore be assessed in line with our town centre policies, particularly Policy TC4 Town centre uses and Policy A1 Managing the impact of development. The

Council will also take into consideration any concerns raised from stakeholders within adjoining areas beyond Camden's boundaries. Alcohol related crime and late night disorder have been identified as significant issues, particularly within Camden Town and the Seven Dials area of Central

London. Camden's Statement of Licensing Policy sets out the Council's approach to licensing and special licensing policies apply to these areas."