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Dear Kristina,

**RE: 100 and 100a Chalk Farm – Request for an Environmental Impact Assessment (EIA) Screening Opinion**

We write on behalf Regal Chalk Farm Limited (hereinafter referred to as the ‘Applicant’) to request that the London Borough of Camden (LBC) adopts an Environmental Impact Assessment (‘EIA’) Screening Opinion in relation to the proposed redevelopment at 100 Chalk Farm Road, Chalk Farm, London NW1 8EH (‘the site’).

The Applicant is seeking full planning permission for the redevelopment of the site which will provide 265 student accommodation units, together with 455 sqm (GIA) of commercial space, 24 affordable residential units, with public realm improvements, new areas of landscaping, amenity and play space, and improved accessibility to the site.

**Information Required for Screening**

Regulation 6(2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017<sup>1</sup> (as amended) (the ‘EIA Regulations’) require that the following information be provided with a screening opinion request:

- “(a) a plan sufficient to identify the land;
- (b) a description of the development, including in particular -
  - (i) a description of the physical characteristics of the development and, where relevant, of demolition works;
  - (ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- (c) a description of the aspects of the environment likely to be significantly affected by the development;
- (d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from:
  - (i) the expected residues and emissions and the production of waste, where relevant; and
  - (ii) the use of natural resources, in particular soil, land, water and biodiversity; and
- (e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment”

With regard to the EIA Regulations, the Proposed Development falls under the Description of Development in Schedule 2 10(b) of ‘Urban Development Projects’. For this type of development, consideration must be given

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<sup>1</sup> His Majesty’s Stationary Office (HMSO) 2017. *The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (as amended in 2018 and 2020)*.



to whether the site is located in a 'sensitive area' (see **Appendix 1**), or whether the associated relevant screening thresholds and criteria are met or exceeded.

The following sections and contents of this letter provide the relevant information required for consideration by the Local Planning Authority (in this case, the LBC).

### **The Site and Surrounding Context**

The site location is shown in **Figure 1** and the indicative planning application red line boundary in **Figure 2**.

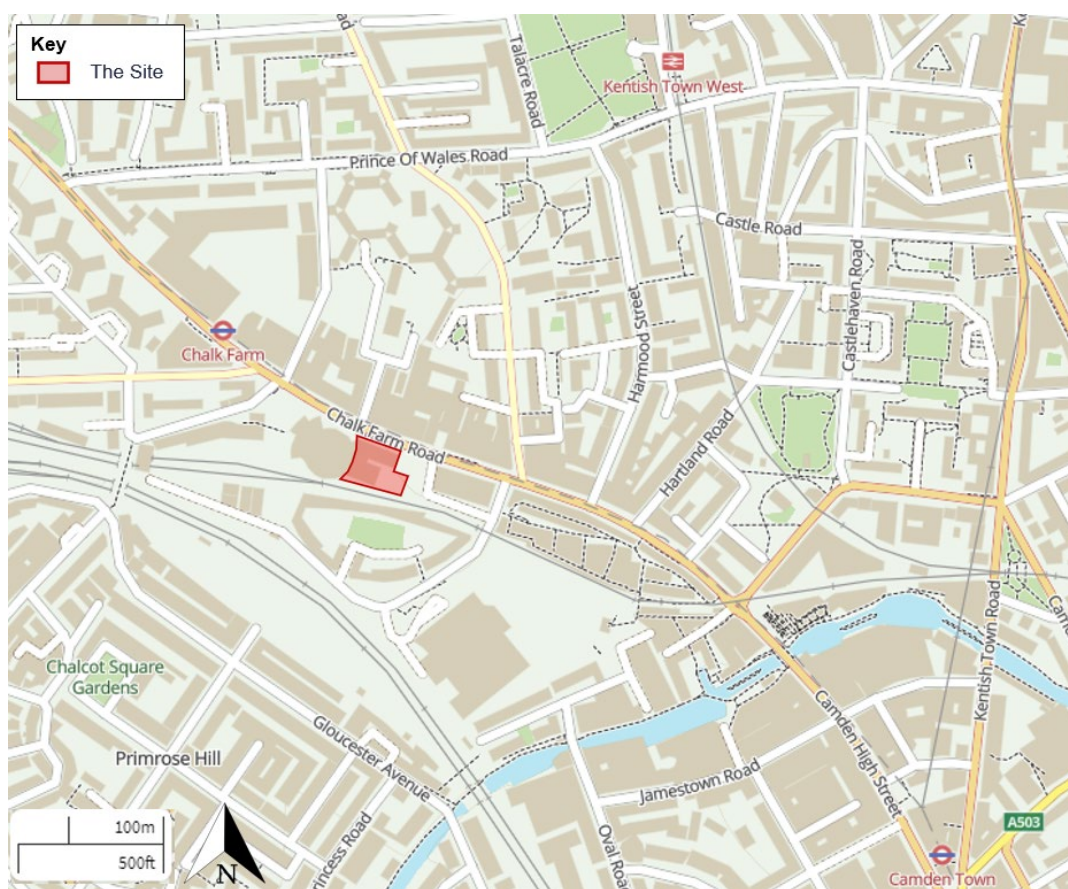
The Site is located within the administrative boundary of the LBC and is bordered to the:

- North by a mixture of residential and commercial land uses along Chalk Farm Road (A502);
- East by the redevelopment the former Morrisons petrol filling station which is being redeveloped as part of a wider development known as Camden Goods Yard (2017/3847/P)<sup>2</sup>. The wider development is currently under construction through a joint venture between Berkeley Homes and Morrisons;
- South by the mainline railway into Euston and Juniper Crescent Housing Estate further south; and
- West by the Grade II\* listed Roundhouse theatre and Chalk Farm Underground Station

The existing site consists of three 1970s commercial buildings which reach a maximum height of +48.42m AOD (20.20m in height from Chalk Farm Road pavement): the main six-storey office building fronting Chalk Farm Road; a two-storey link building which adjoins the Roundhouse; and a three-storey office building to the rear of the site. There are surface and subterranean car parks at the rear.

The site slopes steeply up from Chalk Farm Road to the circa 3 metre retaining railway wall - the change in level is approximately 4.5 metres. The site is broadly rectangular in shape and is 0.28 hectares in area.

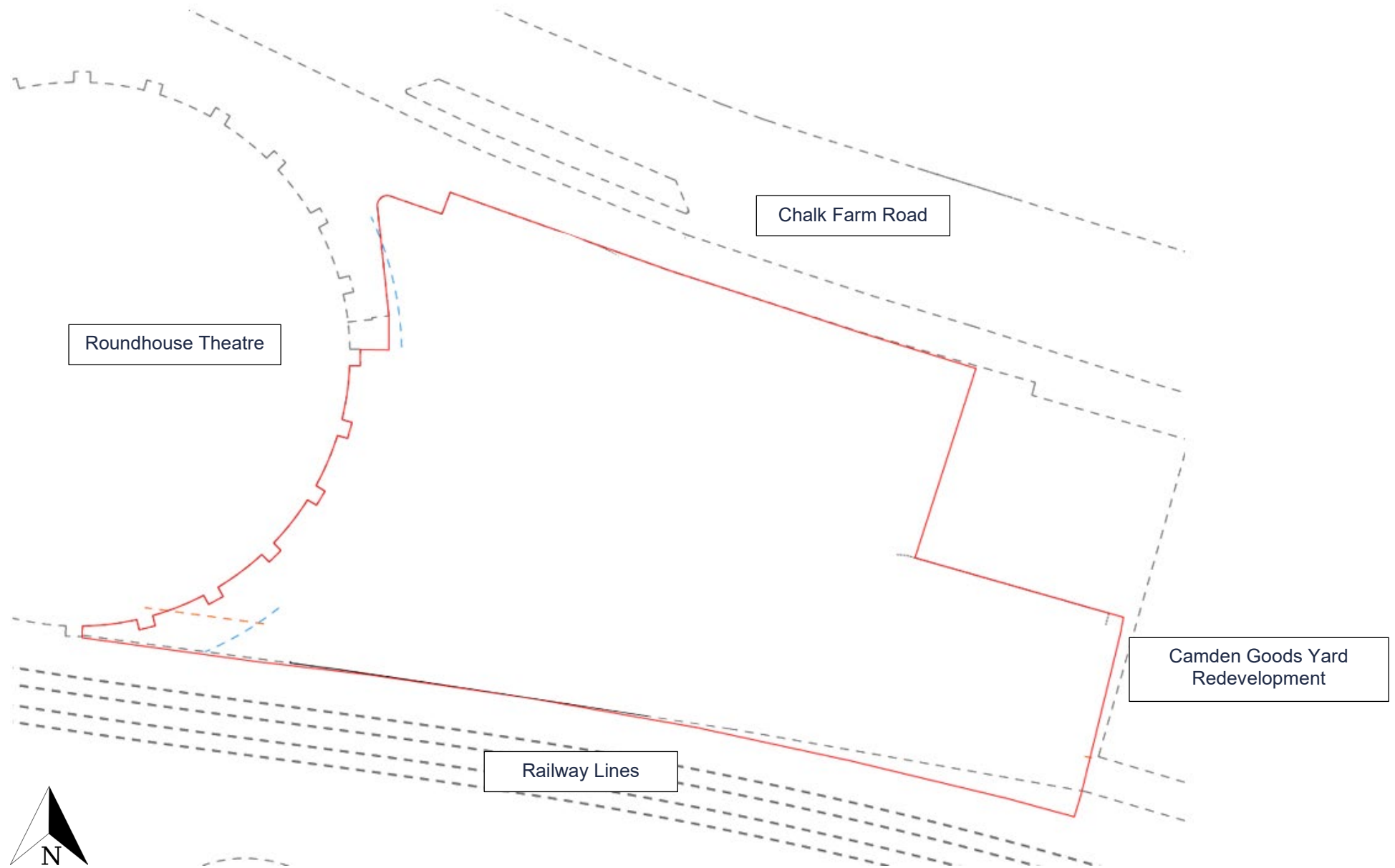
**Figure 1 Site Location**



<sup>2</sup> To the west is the former Morrisons petrol filling station which is being redeveloped as part of a wider development known as Camden Goods Yard (ref. 2017/3847/P (as amended)). The wider development is currently under construction through a joint venture between Berkeley Homes and Morrisons. The adjacent site is currently in use as a temporary supermarket but has planning permission for a 6-storey building with replacement PFS and ground floor retail with circa 8,000 sqm of office floorspace on upper floors. There is also a Section 73 approval (ref. 2022/3646/P) to provide an electric vehicle charging facility and to undertake various design changes to the approved scheme, including extending the building towards the boundary with the application site.



Figure 2 Indicative Site Red Line Boundary (Not to Scale)



## **Proposed Development and Accompanying Technical Reports**

A full (detailed) planning application is being submitted for demolition of the existing buildings and redevelopment of the site to provide two buildings ranging in height from 6 to 12 storeys containing purpose-built student accommodation (PBSA) with 265 rooms, associated amenity and ancillary space (Sui Generis), 24 affordable residential homes (Class C3), ground floor commercial space (Class E) together with public realm, access, servicing, and other associated works.

Building 1, which is to contain 3 'drum' shaped buildings will range in height from 6-12 storeys with a maximum height of +68.48m AOD. Building 2 is proposed to be 10 storeys and +62.58m AOD in height.

The Proposed Development will be car-free, except for a blue badge parking space. Long and short-stay cycle parking will be provided.

The following technical reports which consider potential environmental impacts will accompany the planning application:

- Acoustic Report;
- Air Quality Assessment;
- Archaeology Assessment;
- Ecological Impact Assessment (EclA) Report and Biodiversity Impact Assessment;
- Construction Management Plan;
- Contaminated Land Assessment;
- Daylight, Sunlight, and Microclimate Assessment;
- Solar Glare Assessment;
- Delivery and Servicing Management Plan;
- Drainage Report (including Sustainable Drainage Systems (SuDS) Strategy);
- Flood Risk Assessment;
- Energy Statement;
- Health Impact Assessment;
- Heritage, Townscape, Visual Impact Assessment;
- Transport Assessment (including Travel Plan); and
- Wind And Microclimate Assessment.

## **Application of the EIA Regulations**

The EIA Regulations provide screening criteria and thresholds at which certain types of development projects should be screened to determine whether a project is an 'EIA Development'.

Regulation 2 of the EIA Regulations defines 'EIA Development' as development which is either Schedule 1 development, where EIA is mandatory, or Schedule 2 development, where the development is of description mentioned in column 1 of the table in Schedule 2 where —

- (a) any part of that development is to be carried out in a sensitive area; or
- (b) any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development.

For Schedule 2 Development, the local planning authority should consider whether the development is likely to have significant effects on the environment, that would trigger the need for an EIA.

These definitions have been applied to the Proposed Development and discussed below.

### ***Schedule 1 Development?***

The Proposed Development does not fall under any of the descriptions within Schedule 1, and therefore it is not 'Schedule 1 Development'.

## **Schedule 2 Development?**

The Proposed Development does fall within the definition under paragraph 10(b) 'Urban Development Projects', as listed in Column 1 of Schedule 2. However, for this type of development to be 'Schedule 2 Development', it must be:

- (a) carried out in a 'sensitive area' (as defined under regulation 2 – refer to **Appendix 1** at the end of this letter), or
- (b) one where any applicable threshold or criterion for paragraph 10(b) development is respectively exceeded or met, which in this case are that:
  - the development includes more than 1 hectare of urban development which is not dwellinghouse development; or
  - the development includes more than 150 dwellings; or
  - the overall area of the development exceeds 5 hectares.

Given that the Proposed Development:

- is not located in a 'sensitive area' as defined by the EIA Regulations;
- will only provide 24 residential dwellings (therefore under 150 residential dwellings);
- the total site area is approximately 0.28 hectares (therefore would not include more than 1 ha of urban development which is not dwellinghouse development);

The Proposed Development does not exceed or meet any applicable threshold or criterion specified in Schedule 2 paragraph 10(b), and therefore does not constitute 'Schedule 2 Development'.

### **Application of UK Planning Guidance**

Planning Practice Guidance (PPG)<sup>3</sup> relating to EIA states that:

*"it should not be presumed that developments above the indicative (Schedule 2) thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits".*

In respect of the Proposed Development, it has been established above that the site location/site area/dwelling thresholds and criteria of Schedule 2 paragraph 10(b) are not met or exceeded. However, when considering the development proposed and its surrounding environmental context, and for completeness, consideration as to whether significant environmental effects are likely to arise as a result of the Proposed Development has been given by the Applicant and their design, planning and consultancy team.

The potential for significant environmental effects has been considered in respect of the construction works, and once the Proposed Development is complete and in operation.

A summary of these considerations is presented in **Appendix 2** of this document.

### **Conclusion**

The Proposed Development is not a Schedule 1 development, is not located in a sensitive area, and does not exceed or meet any applicable threshold or criterion in Schedule 2 paragraph 10(b), therefore does not constitute 'Schedule 2 Development' in which an EIA could be required.

As such, there is no legal requirement to seek a Screening Opinion from the Local Planning Authority through the EIA Screening process. However, given the site's surrounding context and nature of the Proposed Development the Applicant seeks confirmation of this with the LBC.

We trust that the information presented within this letter and appendices is sufficient for the LBC to adopt an EIA Screening Opinion for this Proposed Development within three weeks from receipt of this letter.

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<sup>3</sup> <https://www.gov.uk/guidance/environmental-impact-assessment>



## **Appendix 1: Sensitive Area Definition**

Definition of 'sensitive area' within the EIA Regulations (within Regulation 2 – 'Interpretation')

*"sensitive area" means any of the following—*

- (a) land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981(23);*
- (b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949(24);*
- (c) the Broads (25);*
- (d) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (26);*
- (e) a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979(27);*
- (f) an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000(28) as confirmed by the Secretary of State;*
- (g) a European site."*


## Appendix 2: Environmental Considerations

Aspects of the Environment	Review of the Potential for Significant Effects
Socio Economics and Health	<p>The scale of the works will not generate significant effects in respect of socio-economics or health considerations either during the construction works or on completion and occupation of the Proposed Development. The likely benefits of the Proposed Development relate to the temporary job creation during construction, job creation during operation, and local spending from the additional workers, students and residents. The new population may use public facilities (such as schools, GPs), however, when considering the scale of the redevelopment, these impacts are unlikely to be significant.</p>
Archaeology	<p>The site is located within the Regent's Canal Tier 2 Archaeological Priority Area (APA) which is categorised as an area of historic transport interchanges and industrial development that grew up beside the Regents Canal.</p> <p>The Proposed Development will involve below ground works (excavations/piling/foundations) to construct the basement areas. The existing built structures within the site would have impacted any potential remains present, however an Archaeological Desk Based Assessment (DBA) will be prepared to accompany the planning application. Subject to its findings, a programme of archaeological works will be undertaken comprising preliminary monitoring of any geotechnical investigations, followed, if necessary, by targeted evaluation test pits to fully determine the nature of archaeological survival.</p> <p>Depending on the results, archaeological excavation and recording, and / or a watching brief will be undertaken, during preliminary groundworks, and the results disseminated at an appropriate level to ensure the significance of the buried heritage assets can be understood and that the information is available for future research.</p> <p>The nature and extent of works required will depend on the details of the proposed below ground works and whether whole scale deconstruction and site clearance would precede archaeological works and the amount of groundbreaking required. The scope of intrusive works on the site would be agreed in advance with the Greater London Archaeology Advisory Service (GLAAS) who provide archaeological advice to the LBC and in accordance with an approved archaeological Written Scheme of Investigation (WSI).</p> <p>As such, with the above mitigation measures committed as part of the planning application significant effects to archaeological can be managed in accordance with GLAAS and LBC requirements.</p>
Ground Conditions	<p>A Contaminated Land Assessment (CLA) containing a preliminary geoenvironmental source-pathway-receptor risk assessment (Phase 1 Desk Study) has been carried out to determine any unacceptable risks and the most suitable method to manage risks and implement remediation, if required. The assessment has considered available data and logged industrial entries available in the public domain. The CLA will be submitted to accompany the planning application in which the potential contamination source risk drivers would be defined for consideration as part of subsequent intrusive site investigations.</p> <p>Potential off-site sources of contamination include, but are not limited to, the adjacent former petrol station site to the east (which forms part of the Camden Goods Yard redevelopment), the existing railway lines directly to the south which may have included adjacent onsite railway siding or infrastructure associated within the APA and the existing roadway to the north.</p> <p>Based on available online mapping, the site is within a location considered to be between low – moderate risk of encountering UXO. As such, a further Detailed UXO Risk Assessment may be required. This will be detailed as part of the CLA and secured by planning conditions. In lieu of a Stage 2 Detailed Risk Assessment, on-site support for any planned ground works will be required.</p> <p>The Phase 1 Desk Study Report has identified that a site-specific ground investigation is required to verify the ground conditions and groundwater levels for foundation design and geoenvironmental assessment.</p> <p>The site-specific ground investigation is anticipated to comprise the following:</p> <ul style="list-style-type: none"> <li>• Boreholes to facilitate sampling and in situ testing for foundation design and geoenvironmental assessment, boreholes will also facilitate geophysical testing in the form of parallel seismic and magnetometer testing;</li> <li>• Geotechnical laboratory testing for foundation design;</li> <li>• Geoenvironmental laboratory testing for chemical contamination analyses of both soils and groundwater (if encountered);</li> <li>• Installation of ground gas and groundwater monitoring wells; and</li> <li>• UXO on-site support (depending on findings of any Stage 2 Detailed Risk Assessment).</li> </ul> <p>The Proposed Development will require below ground works (excavations/piling/foundations) for the proposed basements. However, with the implementation of good construction practices regarding piling depths and to manage contaminated soil, it is anticipated that there will be no significant effects during the demolition / construction works. Standard mitigation measures to manage contaminated soils can be included in a Construction Method Statement (CMS), secured through a planning condition.</p> <p>It is considered that there will also be no significant effects on ground conditions once the Proposed Development is operational.</p>

Aspects of the Environment	Review of the Potential for Significant Effects
	<p>The CLA will be submitted in support of the planning application. In addition, a Phase II Geo-Environmental Risk Assessment will be prepared following the site specific ground investigation, followed by a Remediation Method Statement and Verification Report if required. This can all be secured by the LBC through appropriately worded planning conditions.</p>
Traffic and Transport	<p>The Public Transport Accessibility Level (PTAL) for the site is 6a, the highest possible rating, indicating the exceptional access to public transport at the site. All public transport modes in London are currently available at the site including access to National Rail, London Overground, Tube, DLR, Tram, Buses.</p> <p>As such, trips during the construction phase are anticipated to be made on public transport or using active modes such as walking and cycling. When construction vehicle arrivals are required, all movements will be scheduled and managed in line with a Construction Logistics Plan (CLP), which can be secured by the LBC via planning condition. Construction activities are unlikely to result of a significant increase in construction traffic, namely from Heavy Duty Vehicles (HDV), on the local transport and highways network throughout the construction programme. Therefore, any adverse effects to highway capacity resulting in road vehicle driver and passenger delay, severance of communities, delay and amenity for non-motorised users, public transport capacity, bus passenger delay or road user and pedestrian safety would be temporary and will be managed through the implementation of a CLP. As such, effects as a result of construction traffic and activities are unlikely to be considered significant.</p> <p>Once the Proposed Development is operational, it is expected that the majority of arrivals and departures will be undertaken by sustainable and active modes of travel. The Proposed Development will be car free and there will be no on-site car parking, except for the policy-compliant Blue Badge parking. Additionally, car parking nearby is limited and there are restrictions on vehicles stopping on all nearby roads. It is expected that vehicle movements associated with the Proposed Development will be predominantly related to delivery and servicing activity, which due to the predominant student accommodation and residential land uses is not expected to be high. Daytime deliveries are expected to be limited and, where necessary, will be undertaken using sustainable modes such as cargo bikes. No adverse impacts are expected from deliveries or servicing due to the scale of the development and the net increase in trips is therefore expected to be low. Significant road traffic impacts are therefore not considered likely.</p> <p>A Delivery and Servicing Plan (DSP) can be secured by the LBC through a planning condition. Given the scale of the Proposed Development, and the relatively car-free nature of the development once operational, significant adverse effects are not considered to be likely on the highway network or public transport.</p> <p>A Transport Assessment will be submitted in support of the planning application.</p>
Air Quality	<p>A Preliminary Air Quality Assessment has been completed for the site and will be accompany the planning application as part of the Air Quality Assessment. The site is located within a borough-wide Air Quality Management Area (AQMA) declared by the LBC for exceedances of the annual mean NO<sub>2</sub> and 24-hour mean PM<sub>10</sub> objectives. It is also located close to one of the Greater London Authority's (GLA's) air quality Focus Areas; these are locations with high levels of human exposure where the annual mean limit value for NO<sub>2</sub> is exceeded. The site is not located in proximity to any significant industrial or waste management sources that are likely to affect the Proposed Development, in terms of air quality.</p> <p>The LBC currently operates five automatic monitoring stations, one of which (Camden High Street) is within proximity to the Proposed Development. This automatic monitor measures NO<sub>2</sub> concentrations only. The LBC also operates a number of NO<sub>2</sub> monitoring sites which are deployed on Chalk Farm Road one of which is located opposite the site, and six which are deployed on nearby side roads off Chalk Farm Road. A review of the monitoring data has shown that there are no exceedances of the annual mean NO<sub>2</sub> objective, or the Air Quality CPG criteria occurred in 2022. No exceedance of the hourly NO<sub>2</sub> objective were measured in 2022 at the Camden High Street automatic monitor and annual mean concentrations were less than 60 µg/m<sup>3</sup> at all nearby diffusion tube sites.</p> <p>Given the baseline air quality in the vicinity of the Proposed Development and the size of the site, HDVs during the construction programme are unlikely to exceed the EPUK/IAQM screening criteria<sup>4</sup> in regard to annual average daily traffic (AADT) flows. Therefore, adverse effects as a result of construction traffic emissions are unlikely to be considered significant.</p> <p>A construction dust risk assessment would assign a risk associated with dust from construction activities from the proposed development. This risk could vary from negligible to high risk depending on the nature of the construction activities undertaken at the site. As a result, a Dust Management Plan (DMP) would be prepared, forming part of the Construction Environmental Management Plan (CEMP), which would determine the appropriate level of mitigation required to ensure there would be no significant effects to the site or the surrounding areas air quality. These measures within the DMP would be expected to be secured through a planning condition.</p> <p>The proposed Energy Statement uses air source heat pumps as the primary energy supply, and no CHP or boilers (combustion plant) are anticipated to be included as part of the principal energy strategy for the Proposed Development. Diesel generators may be proposed for back-up and life-safety use only. The following MEP design controls will be incorporated into the Energy Statement and Sustainability Strategy in which the following measures are considered:</p>

<sup>4</sup> Institute of Air Quality Management, *Land-Use Planning & Development Control: Planning for Air Quality (January 2017)*, Available online: <https://iaqm.co.uk/guidance/>



Aspects of the Environment	Review of the Potential for Significant Effects
	<ul style="list-style-type: none"> <li>• If any ventilation air intakes are proposed, ensure these are located as far away as possible from sources of air pollution (i.e. located away from Chalk Farm Road and any onsite emergency generators);</li> <li>• Locating the exhaust of any emergency generators at the highest point within the Proposed Development (i.e. at the highest roof level), away from air intakes, accessible terraces and openable windows.</li> </ul> <p>As such, there are not anticipated to be any significant air quality effects associated with the energy strategy during normal operation of the Proposed Development.</p> <p>Vehicle trip generation as a result of the operation of the Proposed Development are expected to be negligible to low. This is due to the car free nature of the scheme as well as the proposed land uses being primarily student accommodation with some ground floor commercial floorspace. The majority of people travelling to or from the site are assumed to travel by public transport and any servicing and deliveries are likely to be outside of peak times. Therefore, due to the existing baseline air quality conditions any increase in road traffic is unlikely to the IAQM and Environmental Protection UK (EPUK) thresholds for within an AQMA. As such, exposure to elevated pollutant concentrations at existing sensitive receptor locations in the vicinity of the site is not anticipated to be significant.</p> <p>The planning application is to be accompanied by an Air Quality Assessment further detailing the above and outlining the relevant mitigation measures and controls anticipated to be secured by planning condition.</p>
Noise and Vibration	<p>Noise sensitive receptors have been identified close to the site (the site is highlighted in red below), which would include residential and commercial premises on Chalk Farm Road and Belmont Street (highlighted in green below) and the residential premises on Juniper Crescent (highlighted in blue) which would be the most susceptible to construction noise. The adjacent Roundhouse Theatre to the west and the vacant site to the east, which is currently being used as a temporary supermarket, are less susceptible to construction noise as the operation of these land uses are unlikely to coincide with construction activities during the day or be as sensitive to temporary noise disturbance.</p>  <p>An environmental noise survey is currently underway on site to establish baseline noise levels (noise monitoring locations are shown as letters above). However, a preliminary review of existing data available for nearby sites indicates that noise levels are typical for an urban London environment. The site is located close to railway lines to the south used primarily by the London Overground service only. However, it is not planned to assess environmental vibration impact upon the Proposed Development as vibration from these railway lines existing operation is expected to be low.</p> <p>With regards to construction noise, residential properties on Chalk Farm Road and Belmont Street and the residential premises within Juniper Crescent are likely to experience differing scales of adverse noise effects. However, these effects would be temporary, as a result of specific activities and for specific durations and will be managed as far as practical through the implementation of Best Management Practices (BMP) as defined in Section 72 of the Control of Pollution Act (COPA) 1974, carrying out all work in such a manner as to reduce any disturbance from noise to a minimum. Where relevant and during the detailed working up of the construction programme and preparation of the CEMP, the BMPs (ie, a CEMP and CLP, hoarding, limited working hours, etc) to mitigate potential noise and vibration effects on nearby noise sensitive premises will be defined and agreed with the LBC. The primary method for the control of construction noise and vibration being a Section 61 agreement under the COPA.</p>

Aspects of the Environment	Review of the Potential for Significant Effects
	<p>A Section 61 agreement under the COPA will contain appropriate noise and vibration limits at nearby properties. These limits shall be monitored and reported, with the reports highlighting when it is likely that the construction limits will be exceeded, so that construction activities can be effectively altered to mitigate impacts accordingly. In addition, a Section 61 agreement also sets out a dispensation and variation procedure under which consent can be applied to carry out works which would potentially exceed the agreed noise and vibration limits or must occur at times when such work is otherwise not approved. Such dispensation / variations would be applied for where there are good engineering, safety or practical reasons for undertaking works at these times. The selected contractor should adopt measures, including site supervision agreements, to reduce noise and vibration to a minimum in accordance with BMPs, as defined within the COPA. The requirement for the implementation of BMPs and a Section 61 agreement can be secured through a planning condition.</p> <p>Commercial noise break-out from ground floor commercial units is expected to be controlled by the building facade. Operation noise limits will be set by LBC for any incoming tenants to achieve at nearby noise sensitive receptors. Based on these limits being achieved, no adverse effect on nearby noise sensitive receptors is expected. The need to control operational noise from future tenants can be secured by the LBC via planning condition.</p> <p>An Acoustic Report will be provided to accompany the planning application to summarise the results of environmental noise surveys, identify plant noise limits, and provide outline assessments of noise impacts for the completed development.</p>
Water Resources and Flood Risk	<p>The site is situated within Flood Zone 1 and Environment Agency (EA) information for the site indicates that there is a low risk of surface water flooding.</p> <p>The scale of the demolition/construction works are not likely to generate significant adverse effects on flood risk, water quality or capacity. Standard mitigation measures relating to surface water management, drainage and waste, contamination prevention, and water usage, can be included in a CEMP or CMS, secured through a planning condition.</p> <p>Once operational, the Proposed Development will include Sustainable Urban Drainage Systems (SUDS). Thames Water will be consulted in relation to foul and surface water drainage. Significant adverse effects on flood risk, water quality or capacity are not considered to be likely.</p> <p>A Flood Risk Assessment and Drainage Report will be submitted to accompany the planning application.</p>
Ecology	<p>Ecological baseline surveys were completed in November 2022 which included an extended UK habitat survey and daytime building and tree assessments for protected and priority species – including bats. These surveys concluded that the following protected and priority species to be present:</p> <ul style="list-style-type: none"> <li>• Potential for roosting bats within The Roundhouse to the west of the site;</li> <li>• Opportunities for foraging and commuting bats within the site;</li> <li>• Opportunities for nesting birds within the trees, introduced shrub and rooftops; and</li> <li>• Suitable foraging and resting habitat for hedgehogs and common toad.</li> </ul> <p>The majority of habitats within the site and immediate surrounds are of negligible value in terms of ecological interest. However, in the absence of mitigation, may result in the following:</p> <ul style="list-style-type: none"> <li>• Obstruction and/or disturbance of potential bat roost(s) within the adjacent Roundhouse building;</li> <li>• Disturbance of foraging and commuting bats through altered/increased levels of lighting; and</li> <li>• Destruction of active wild birds' nests during vegetation clearance or building demolition.</li> </ul> <p>To avoid and/or mitigate adverse impacts and resultant effects described above the following best practice construction methods (summarise within the standalone Construction Management Plan standalone planning report) and embedded design mitigation are committed to as part of Proposed Development:</p> <ul style="list-style-type: none"> <li>• A sufficient buffer from the wall (eastern elevation) of the Roundhouse building will be provided so that no additional light spill towards the buildings occurs during construction;</li> <li>• Construction works are to maintain a buffer from the Roundhouse building to prevent obstruction for any potential bats using the existing building for roosting.</li> <li>• If demolition and/or construction activities are to take place adjacent to the Roundhouse and a sufficient buffer, described above, cannot be provided, then further surveys could be undertaken to establish if bats are roosting within the building. One emergence and/or return to roost survey should be completed between May and August 2024 with surveyors located around the building focused on potential roosting features.</li> <li>• Any wild birds' nests are protected whilst in use. If any active wild birds' nests are found prior to vegetation clearance or building demolition, then these must be left alone until they cease to be in use. Ideally, works to suitable nesting habitat/features should be scheduled to avoid the bird nesting season (March to August inclusive). Should such works take place during March-August inclusive, they must be immediately preceded by a check for any active nests by a suitably qualified ecologist. Any active nests identified during works (regardless of time of year) would need to be protected and left with a suitable buffer (to be defined by the ecologist) until the nest is no longer active.</li> </ul>

Aspects of the Environment	Review of the Potential for Significant Effects
	<ul style="list-style-type: none"> <li>• Construction activities will include measure to safeguard wild animals should they enter the site during construction works, and to discourage wild animals from entering the site. This can be achieved by implementing the following standard mitigation measures: trenches or pits left overnight should be provided with a means of escape for wild animals should they enter such as a collapsed edge or a flat roughened stable plank (no steeper than 45°) acting as a ramp to the surface, pipes should be capped off overnight to prevent animals entering and becoming trapped; and all trenches and pits will be inspected each morning to ensure no wild animals have become trapped overnight. Should a badger become trapped in a trench it will likely dig itself into the side of the trench. Should a trapped badger be encountered, a suitably qualified ecologist should be contacted immediately for further advice.</li> <li>• Habitat creation and planting within the site will incorporate native plants which are of local provenance and are of benefit to wildlife;</li> <li>• Any lighting for the development will be designed sensitively in accordance with industry standard guidance (BCT &amp; ILP, 2018) and the following principles will need to be adopted: maintaining dark corridors along the site boundaries, particularly along the southern site boundary; not illuminating planted or retained trees;</li> <li>• Where lighting is required, ensuring: light levels are less than 3 Lux; LED luminaires with a warm white spectrum ideally &lt;2700 Kelvin (to avoid blue / UV elements); bollard or low-level downward directional luminaires are used and mounted on the horizontal (with no upward tilt); and security lighting, if required, is motion-activated with short (1 minute) timers.</li> </ul> <p>The following enhancement measures are also proposed to be incorporated into the landscape design and incorporated into the Landscape Design and Access Statement which will accompany the planning application:</p> <ul style="list-style-type: none"> <li>• Woodcrete / woodstone bat boxes will be integrated into the design of new buildings or affixed to retained buildings or trees following construction.</li> <li>• Woodcrete / woodstone bird boxes will be integrated into the design of new buildings or affixed to retained buildings or trees following construction. Specified boxes should target local notable species which are likely to occur within the area such as starling (<i>Sturnus vulgaris</i>), swift (<i>Apus apus</i>) and house sparrow (<i>Passer domesticus</i>).</li> <li>• Woodcrete / woodstone insect nest boxes will be installed on south-facing walls or trees in a sheltered location within the site to enhance the site for invertebrates.</li> <li>• Any fences or walls will include hedgehog friendly gravel boards with holes 13cm x 13cm in the base to prevent habitat fragmentation for hedgehog.</li> </ul> <p>The planning application is to be accompanied by an Ecological Impact Assessment (EcIA) report and Biodiversity Impact Assessment (including a report, a metric spreadsheet and condition assessments).</p> <p>The biodiversity impact metric and assessment of the site establishes the net change in relation to biodiversity. Once the landscaping for the site has been finalised for the application, the DEFRA Biodiversity Metric should be used to evaluate the existing value of the site in relation to biodiversity and the biodiversity value of the proposed landscaping for the site. The findings of which and the net gain in biodiversity for the Proposed Development will be provided within the Biodiversity Impact Assessment standalone planning report.</p> <p>On the basis that the above construction and completed development stage mitigation is committed to as part of the planning application, significant effects to ecology and biodiversity are considered unlikely / avoided.</p>
Daylight, Sunlight and Overshadowing, Light Pollution and Solar Glare	<p>Neighbouring properties adjacent to / in proximity to the site of the Proposed Development are likely to experience a change in their existing daylight and sunlight levels. Initial testing and design evolution of the scheme indicates that the following neighbouring properties would experience a reduction in daylight and/or sunlight levels:</p> <ul style="list-style-type: none"> <li>• The Chalk House – ground floor commercial and residential properties directly to the north of the Proposed Development on Chalk Farm Road;</li> <li>• 67-70 Chalk Farm Road – residential properties to the southeast of the Site of the Proposed Development</li> <li>• Juniper Crescent – residential properties to the south of the Site of the Proposed Development (south of the railway lines).</li> </ul> <p>It is not considered likely that any other surrounding neighbouring properties would be materially impacted by the Proposed Development due to the distance from the site. Whilst other buildings are located within a proximity to the Proposed Development, daylight and sunlight assessments of these are not considered necessary as there are no residential elements within these buildings or properties, particularly to the west and northwest.</p> <p>Existing amenity spaces to be tested for overshadowing include the existing amenity space located within Juniper Crescent to the south. This space is unlikely to experience a noticeable change in overshadowing conditions, given the distance between the Proposed Development and the space. The BRE Report<sup>5</sup> recommended two hours</p>

<sup>5</sup> The BRE Report *Site layout planning for daylight and sunlight: a guide to good practice (BR209)* advises on planning developments for good access to daylight and sunlight, and is widely used by local authorities during planning permission to help determine the impacts of new developments.

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	<p>methodology will be applied. Proposed amenity space located within the centre of the Proposed Development will be tested to ensure that the space receives good levels of direct sunlight for future users.</p> <p>Neighbouring properties identified above are likely to experience a reduction to existing levels of daylight and sunlight levels, however, throughout the design process and scheme's evolution, the Proposed Development has been the subject of detailed reviews with the design team to help reduce (where possible) daylight and sunlight impacts to these properties as far as practical. This included a series of scheme iterations which the daylight and sunlight specialist (Consil) tested and provided advice to the design team.</p> <p>BRE Guidance recognises this in its Introduction at paragraph 1.6 which notes that '<i>natural lighting is only one of many factors in site layout design</i>' and the guidelines should be treated flexibly. Local and national planning policy also advocate flexibility in emerging dense urban locations of this nature. Whilst significant effects may occur, this is not uncommon for Proposed Developments of this scale and in locations such as the site.</p> <p>The details of the analysis of the Proposed Development sought for approval will be provided within the Daylight, Sunlight, and Overshading Assessment which will accompany the planning application as a standalone report.</p> <p>In regard to Solar Glare, the Proposed Developments external façade is still being developed and the potential for solar glare is a factor that will be considered. This analysis would be subject to further analysis which would be summarised within a Solar Glare Report which would accompany the planning application. Where glare instances occur, alternative materials will be explored to reduce these as far as reasonably practical. It is further understood that the adjacent railway lines are primarily used by the London Underground service and slow-moving freight train movements. Therefore, where instances of glare remain these are not expected to be disabling or distracting and as a result are not considered significant. The complete detailed analysis and materials explored will be summarised within the Solar Glare Report which would accompany the planning application.</p> <p>Due to the primarily residential nature of the Proposed Development light intrusion / pollution is not considered to result in significant effects to the surrounding neighbouring properties or areas of ecological habitat.</p>
Townscape, Visual and Built Heritage	<p>The site is located at the westernmost end of a thin 'finger' of part of the Regents Canal Conservation Area. The adjacent Roundhouse building is statutorily listed at grade II* and there are a number of other designated heritage assets within the setting and wider context of the Site.</p> <p>A number of viewpoint positions from within the setting and wider context of the site have been identified and shared with LB Camden officers. These are used for initial non-verified view studies in pre-application presentations.</p> <p>A small portion of the Site, towards the east, lies under the LVMF View from Parliament Hill (Protected Vista 2A.2 (from: Parliament Hill: the summit - looking toward the Palace of Westminster, Height of viewing plane: 84.46m AOD). Whilst an important strategic consideration, modelling of the emerging scheme demonstrates that they do not project into or around the view corridor.</p> <p>Primrose Hill Conservation Area lies to the south of the Site, beyond Juniper Crescent and the railway lines and is of significance as 'a smart and sedate residential area'15 of mid-19th century speculative residential development, which displays the contemporary fashion for Classically-influenced architecture typical of developments such as these in London.</p> <p>It its current form, the site's existing buildings:</p> <ul style="list-style-type: none"> <li>• Make a negative contribution to the significance of the listed Roundhouse and are a negative element within its setting;</li> <li>• Make a limited contribution to the character and appearance of the Regent's Canal Conservation Area as a whole; and,</li> <li>• Make no specific contribution, as an element of setting, to the character and appearance of the Primrose Hill Conservation Area, which is of its own distinct special interest and character and appearance.</li> </ul> <p>Demolition and construction activities are likely to result in some harm (albeit minor / very low end of the substantial harm scale) on setting of the Roundhouse and character and appearance of Regent's Canal Conservation Area. When the Proposed Development is completed, and fully operational harm (moderate / lower end of the substantial harm scale) is also expected to the setting of Roundhouse and character and appearance of Regent's Canal Conservation Area. However, the design of the Proposed Development provides an opportunity for greatly improved public realm and engagement of the site with the streetscape and immediate setting of the Roundhouse. Some mitigation of that harm is also possible through heritage-led hard landscaping which can include ways of signaling the 'memory' in keeping with the setting of the Roundhouse and Regent's Canal Conservation Area.</p> <p>In terms of visual impact, whilst the Proposed Development envisages a step change in the appearance of the site, matters of layout, form and massing have been carefully considered to minimise visual impact. In terms of character, the scheme introduces forms and materiality (noting work in progress) that resonate with the industrial heritage of the site and its wider context. As far as practicable (given disassociation of the site from the canal focus of the conservation area), the scheme accords with the characteristics which define the conservation area.</p>



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	As a result of design evolution and consultation with the LBC as part of pre-application discussions no significant effects relating to townscape, built heritage and visual impact are considered likely.. The planning application will be accompanied by a Heritage, Townscape, Visual Impact Assessment (HTVIA) including LVMF analysis and verified views report as a standalone planning report.
Climate Change	<p>Based on the scale of the Proposed Development and the uses proposed, in the context of relevant greenhouse gas emission benchmarks and budgets and the fact that the Proposed Development will incorporate carbon mitigation measures (committed to within the Energy Statement, which will be submitted to accompany the planning application), it is considered unlikely that the contribution of GHG emissions associated with the Proposed Development (including embodied carbon within materials and operational carbon emissions) would lead to material changes in climate conditions over the life of the Proposed Development.</p> <p>In terms of the impact of climate change on the Proposed Development itself, the Proposed Development will incorporate into the design climate change resilience measures, particularly with regard to the energy strategy and flood risk. As such, it is considered unlikely that potential impacts from changes in climate conditions would result in significant effects on the Proposed Development.</p>
Major Accidents and/or Disasters	<p>The only major accidents or disasters that could potentially be considered 'likely' and which are relevant to the Proposed Development are flood risk (which has been considered above) and fire risk (which will be managed through building design in accordance with relevant British Standards) and are therefore not considered to be significant effects.</p> <p>A Flood Risk Assessment and Drainage Strategy are to accompany the planning application detailed these details further.</p>
Wind Microclimate	<p>Within the Greater London area, the dominant wind direction is from the southwest. Wind from this direction will pass over Juniper Crescent and the railway lines immediately prior to reaching the site. The Proposed Development will provide shelter to regions downwind of the site but would have potential to raise ground level wind speeds around the southwestern and southeastern corners. The areas where there is potential for raised wind speeds are mainly located within the railway line, so would not be accessible to the public and would therefore not adversely impact pedestrian level wind speeds.</p> <p>The Proposed Development would provide additional massing on the site relative to the current buildings, which would provide shelter downwind and would be likely to result in substantially calmer wind conditions. In particular, the following off-site regions would be expected to experience an improvement in wind conditions due to the Proposed Development (noting that the exact levels and suitability of conditions in these areas will be determined as part of the full wind assessment as part of the planning submission):</p> <ul style="list-style-type: none"> <li>• The youth space at the western end of the neighbouring Camden Goods Yard development;</li> <li>• Café seating outside 67-68 Chalk Farm Road; and</li> <li>• Building entrances, pedestrian crossings, and bus stops on Chalk Farm Road.</li> </ul> <p>With regards to potential new amenity which will be delivered as part of the Proposed Development, these spaces will either be protected from the oncoming winds by the towers of the development or it will be straightforward to achieve suitable conditions by the inclusion of measures such as trees or pergola type structures. All wind conditions at pedestrian level are expected to be safe and comfortable for pedestrian use, which will be confirmed as part of the planning application via the testing of the proposed development in high-resolution Computational Fluid Dynamics (CFD), including comparison to baseline conditions and also giving consideration to consented schemes in the surrounding area.</p> <p>Given the surroundings of the site and the massing of the Proposed Development, it is anticipated that the Proposed Development will not significantly affect wind conditions along thoroughfares, at building entrances, and within public amenity spaces within the surrounding area.</p> <p>Wind Consultants (GIA) have provided design advice through the design process of the Proposed Development and mitigation measures are being embedded into the design. Additionally, CFD testing will be undertaken for the Proposed Development prior to submission of the planning application, which will identify any areas experiencing unsuitable wind microclimate effects that require mitigation. Mitigation measures will be implemented and tested to ensure all unsuitable conditions are resolved. A Wind and Microclimate Assessment will accompany the planning application.</p>
Waste	<p>In accordance with best practice measures, a Construction Method Statement (CMS) will be prepared, which will include details of the types of waste stream that will likely be generated on-site throughout the construction works, along with the relevant recycling / disposal route. Waste minimisation strategies incorporated in the design and procurement strategy, and information on how waste will be managed during the construction works (e.g. the employment of the waste hierarchy strategy, to minimise the volume of waste produced and to divert waste from landfill as far as possible) will also be outlined within the CMS.</p> <p>A Delivery and Servicing Management Plan (DSMP) will also be produced for the Proposed Development, which would detail the waste storage and waste collection / management system to be incorporated into the Proposed Development, to mitigate any impacts due to waste.</p>



<b>Aspects of the Environment</b>	<b>Review of the Potential for Significant Effects</b>
	In accordance with the above, it is considered that the scale of the construction works, and Proposed Development (once operational) will not generate substantial amounts of construction or operational waste. Therefore, it is anticipated that significant waste effects are not likely to arise as a result of the Proposed Development.