

19 September 2024

Chris Smith
Principal Planner
London Borough of Camden
Planning and Borough Development
5 Pancras Square
c/o Judd Street
WC1H 9JE

Trium Environmental Consulting LLP
The Whitehouse, Belvedere Road
London, SE1 8GA

+44 (0)20 3887 7118
hello@triumenv.co.uk
www.triumenvironmental.co.uk

Dear Chris,

RE: West Kentish Town – EIA Scoping Addendum and EIA Scoping Opinion Response (Planning Reference: 2022/5281/P)

We write on behalf of London Borough of Camden Community Investment Programme (hereinafter referred to as the 'Applicant') to provide an Environmental Impact Assessment (EIA) Scoping Addendum.

The Scoping Addendum relates to the 'EIA Scoping Report November 2022' (hereinafter referred to as the 'EIA Scoping Report') (Planning Reference: 2022/5281/P) submitted to the London Borough of Camden (LBC) on 29th November 2022 and the EIA Scoping Opinion received from the LBC on 3rd March 2023.

EIA Scoping Addendum

The Proposed Development, as described within the EIA Scoping Report, has been amended following further consultation and design review by the Applicant. These changes specifically relate to the revised phasing, minor increase in maximum height and housing tenure mix and distribution of the Proposed Development but also seeks to agree that, as a matter of clarification, the contents of the EIA Scoping Report and Opinion remain valid given the time delay since these were issued.

The Planning Practical Guidance¹ relating to EIA states:

"Where a scoping opinion or direction has been issued, an Environmental Statement must be based on the most recent scoping opinion or direction issued, so far as the proposed development remains materially the same as the proposed development which was subject to the opinion or direction."

Whilst the Proposed Development remains materially the same, this EIA Scoping Addendum sets out the amendments to the Proposed Development and provides a broad description of the Proposed Development on which the Environmental Statement will be based. This letter also provides a summary of any amendments to the technical topic scope and methodology that will be considered within the EIA.

The Proposed Development as Described within the EIA Scoping Report

A hybrid planning application, part detailed, part outline for a comprehensive mixed-use redevelopment to include:

'The demolition of the existing residential units on site and the construction of a residential led scheme, which is likely to include approximately 898 residential dwellings which will contain a mix of affordable and market housing. A small retail/ commercial provision as well as new open space, play space and associated works will also be provided as part of the Proposed Development.

These uses will be located in up to 13 buildings to range between 4 and 14 storeys in height (inclusive of necessary plant). Basements are currently proposed beneath Block D1 and potentially beneath Block B1, C1 and E2. The indicative maximum depth of these basements is approximately 4m below ground level. The allocation of basements will be defined through further design study and development. At present, there is a small allocation for commercial / retail use proposed on the site facing Queen's Crescent.

The Proposed Development will be delivered over a number of phases with Phase 1 (with the potential to split into Phase 1A and Phase 1B) comprising the detailed component and the remaining phases forming the outline component. Phase 1 will comprise the construction of Blocks A1, D1 and G1.'

¹ <https://www.gov.uk/guidance/environmental-impact-assessment>

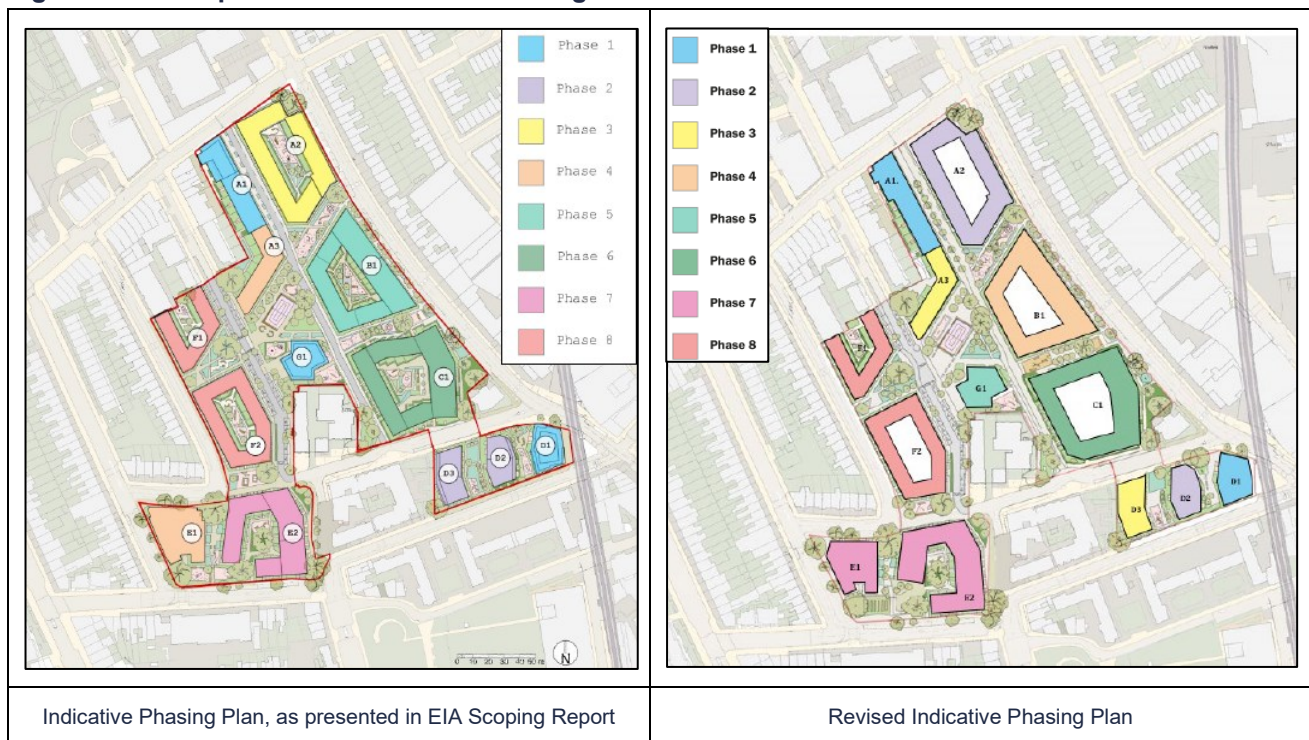


The Amendments to the Proposed Development

Since submission of the EIA Scoping Report and receipt of the Scoping Opinion in 2023, the masterplan phasing, heights and tenure distribution has been reviewed by the Applicant and design team and further consultation has been held by the Applicant with LBC Planning Officers. Following a subsequent design process, a number of scheme changes have been made, which are set out as follows, albeit the overall principles and uses of the Proposed Development, structure of the masterplan, and plot distribution remain largely unchanged:

- Removal of Phase 0 to account for the earlier demolition of the garages and MUGA on site (refer to 'Baseline Conditions' for context);
- Increase in the maximum height of the Proposed Development from 50.0m to 55.00m;
- Block G1 has been moved from the detailed component to the outline component;
- The Indicative Phasing Plan for the Proposed Development has been revised with the following changes with the two different indicative phasing plans shown in Figure 1:
 - Block A2 has been moved from Phase 3 to Phase 2;
 - Block A3 has been moved from Phase 4 to Phase 3;
 - Block B1 has been moved from Phase 5 to Phase 4;
 - Block D3 has been moved from Phase 2 to Phase 3;
 - Block E1 has been moved from Phase 4 to Phase 7;
 - Block G1 has been moved from Phase 1 to Phase 5;

Figure 1 Comparison of Indicative Phasing Plans



- The tenure distribution is still be developed. The option to exclude all Intermediate Rent from the Proposed Development in place of Social Rent is being explored of which the final scheme will be presented and tested within the ES accompanying the planning application; and
- The number of units to be provided within each tenure has changed, however, as the design continues to evolve the maximum number of units detailed within the EIA Scoping Report, of 898, remains valid, although this number is likely to reduce to 856 units as part of the planning application. The scope, as set out within the EIA Scoping Report, is considered to remain valid should the number of units reduce.

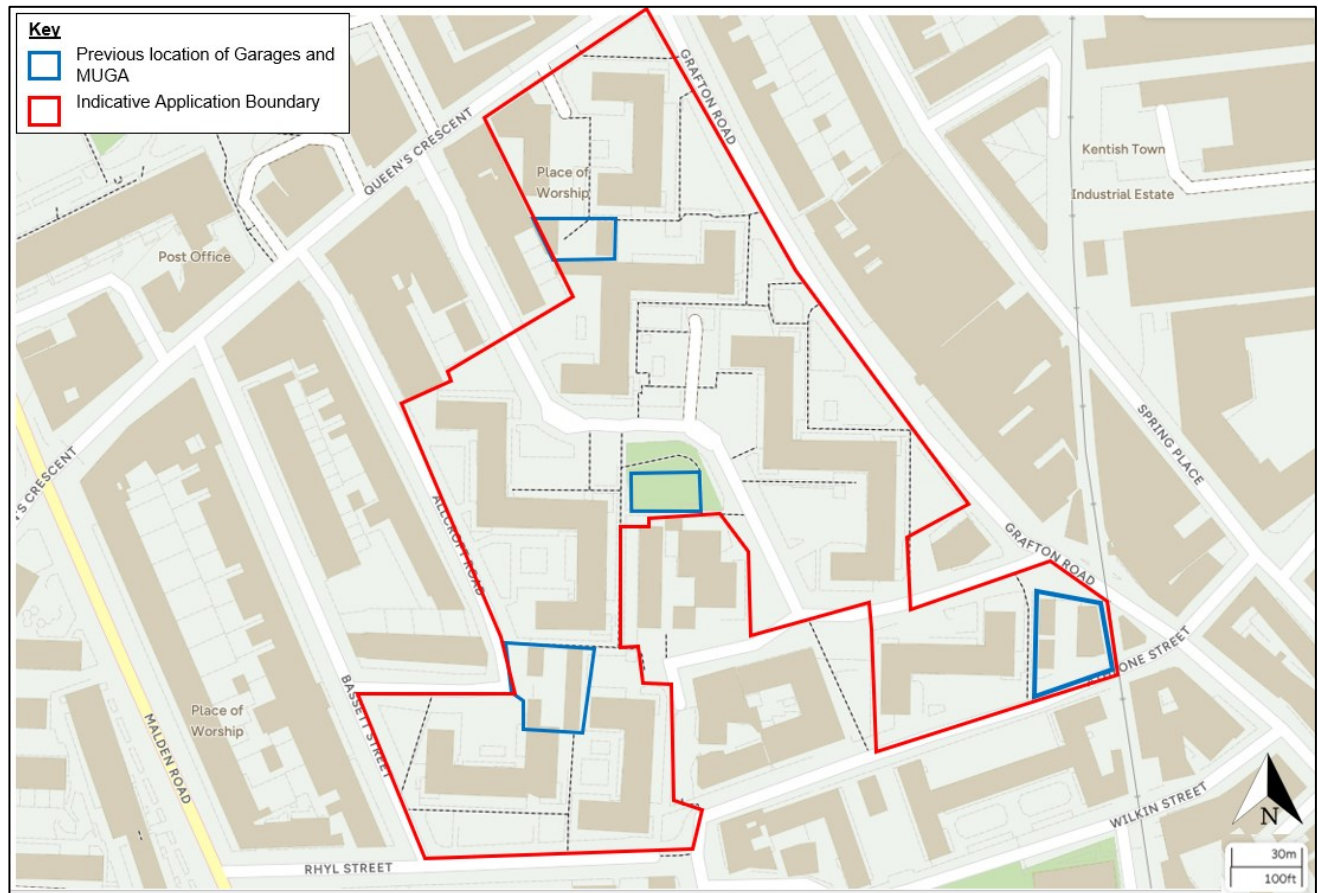
Revised Baseline Conditions

Garages located to the east of the existing Ashington Building (Block D1), to the northwest of the existing Langridge Building (Block E1) and the MUGA space at the Block G1 location have been demolished pursuant



to permitted development rights, since the submission of the EIA Scoping Report and receipt of the EIA Scoping Opinion. The location of these spaces within the site are shown in Figure 2.

Figure 2 Location of Demolished Garages and MUGA



As these garages and MUGA have since been demolished, it is considered that the current baseline position is with these garages/ MUGA removed and therefore, this will be treated as the baseline position within the EIA for the purposes of assessment.

Revision to Environmental Impact Assessment Scope

The revised description of the Proposed Development is broadly in line with the description provided within the EIA Scoping Report. No new land use classes are proposed and therefore no additional assessments are required.

Although the overall number of residential units is likely to decrease, this does not result in a change to the scope and/ or methodology of the EIA originally presented in the EIA Scoping Report.

The technical topics that are 'scoped in' to the EIA and the change to their scope of assessment is summarised in Table 1, including any specific references to guidance and policy that are directly relevant to the scope of these topics.



Table 1 Changes to the Scope of the Environmental Statement

Technical Topic	Change to the Scope of Assessment
Socio Economics	No Change.
Climate Change and Greenhouse Gases	No change. Whilst the scope of the EIA will not change as a result of the amendments to the Proposed Development, it should be noted that determination of significance of effect shall be based on the whole life greenhouse gas emissions of the Proposed Development for the climate change and greenhouse gases assessment in line with IEMA guidance <i>Guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance 2nd Edition</i> , published in 2022, as per recommendations from the Scoping Opinion.
Traffic and Movement (Previously referred to as Transport and Access)	The Scoping Opinion issued by the LBC requested that a traffic and movement assessment be 'scoped in' to the EIA. Consequently, transport and movement is 'scoped in' to the EIA and will consider demolition and construction effects and operational effects (with regards to users of public transport) and will describe how the comments raised in the Scoping Opinion have been considered in the assessment. Additionally, it should be noted that the traffic and transport assessment will be completed in line with the new IEMA guidance <i>Environmental Assessment of Traffic and Movement</i> , published in July 2023 ² . In line with the new guidance, an assessment of public transport impact i.e. capacity of services impact, will be undertaken within the Transport Assessment and will not be included within the Transport Chapter of the ES. The impact of the proposals on users of public transport, for example people walking to / from stations and bus stops as non-motorised users of the highway network, will be considered within the Transport Chapter of the ES. This is in line with the new IEMA guidance listed above.
Air Quality	No change. Whilst the scope EIA will not change as a result of the amendments to the Proposed Development, it should be noted that the air quality assessment will be in line with the new IEMA guidance <i>Guidance on the Assessment of Dust from Demolition and Construction</i> ³ , published in 2024. In line with Greater London Authority guidance <i>London Plan Guidance – Air Quality Neutral</i> ⁴ and <i>London Plan Guidance – Air Quality Positive</i> ⁵ published in 2023, the air quality assessment will assess Air Quality Positive and Air Quality Neutral, as recommended in the Scoping Opinion.
Noise and Vibration	No Change.
Daylight, Sunlight, Overshadowing and Solar Glare	No Change. The amendment to the maximum Proposed Development height is not considered to result in a change to the proposed approach to the Daylight, Sunlight and Overshadowing assessment. The assessment will assess the detailed component using detailed drawings and the outline component using parameter plans and a maximum envelope model to understand the residual effects based on the final frozen scheme which will be within the maximum development height, as set out previously. Although there have been amendments to the phasing strategy, this does not alter the approach regarding scoping out demolition and construction from the assessment. It is still considered that the completed development scenario will present a worst-case scenario and levels of daylight and sunlight availability through the demolition and construction works will be less perceptible compared to the completed development.
Wind Microclimate	No Change. Although the maximum height of the Proposed Development has increased from 50.00m to approximately 55.00m, the proposed approach to the wind microclimate assessment using CFD is considered appropriate.
Ecology	The Preliminary Ecological Appraisal that was appended to the EIA Scoping Report, identified that there was the potential for roosting bat features on-site. Consequently, ecology and biodiversity was 'scoped in' to the EIA. However, since the submission of the EIA Scoping Report, a bat survey was conducted in May 2023 on part of the site. This indicated that there are no roosting bats or roosting features within this part of the site, which is likely to be representative of the wider site. Further bat surveys are currently being undertaken across the wider site and should these determine the absence of bats on-site, agreement is sought that ecology can be 'scoped out' of the ES. If these surveys demonstrate that roosting bats are present, or the existing building have

² Institute of Environmental Management and Assessment, 2023; *Environmental Assessment of Traffic and Movement*

³ [Construction-Dust-Guidance-Jan-2024.pdf \(iaqm.co.uk\)](#)

⁴ [Air Quality Neutral \(AQN\) guidance | London City Hall](#)

⁵ [Air Quality Positive \(AQP\) guidance | London City Hall](#)



Technical Topic	Change to the Scope of Assessment
	<p>a high roosting potential, Ecology and Biodiversity will remain scoped in and the approach to the assessment will remain as presented in the EIA Scoping Report.</p> <p>A Biodiversity Net Gain Assessment will be submitted in support of the planning application.</p>
Heritage, Townscape and Visual Impact Assessment	<p>As part of the EIA Scoping process, the following additional viewpoints were requested by LBC which will form part of the HTVIA assessment submitted as a separate volume to the ES. These viewpoints include:</p> <ul style="list-style-type: none"> • View from the junction of Grafton Road/Queen's Crescent looking west and south, as well as a kinetic view down Grafton Road; • View from the junction of Grafton Road/Warden Road looking west • View along Athlone Street looking east • View along Allcroft Road looking south • View looking west on Queen's Crescent • View north along Talacre Road near to the junction with Wilkin Street (Further north than no.10) • View looking west along Rhyl Street showing the school • View along Basset Street looking south towards school <p>Additionally, the following viewpoints will also be considered within the HTVIA:</p> <ul style="list-style-type: none"> • LVMF 2A.1 Parliament Hill summit to St Paul's Cathedral • Grafton Street • Grafton Road and Queen's Crescent <p>In summary, the viewpoints (VP) considered within the HTVIA will include:</p> <ul style="list-style-type: none"> • VP 1 - Grafton Road (North) - winter • VP 2 - Grafton Road - NORTH - winter • VP 3 - Queens Crescent - Eastern End • VP 4 - Grafton Road - Junction with Holmes Road. • VP 5 - Holmes Road - Close to junction of Cathcart Street - winter • VP 6 - Grafton Road (South) - Close to Inkerman Road - winter • VP 7 - Grafton Road (South), Close to junction with Wilkin Street - winter • VP 8 - Prince of Wales Road. Entrance to Talacre Town Green - winter • VP 9 - Talacre Town Green - winter • VP 10 - Talacre Road - Pedestrian Entrance of Talacare Town Green - winter • VP 11 - Malden Rd - Junction with Rhyl Street - winter • VP 12 - Bassett Street - Junction with Coity Road - winter • VP 13 - Queens Street, Junction with Allcroft Road - winter • VP 14 - Queens Crescent - Western End • VP 15 - Platform of Kentish Town West Station • VP 16 - Grafton Road, Close to the Carlton - winter • VP 17 - LVMF View 2B.1 - London Panorama: Parliament Hill • VP 18 - LVMF 2A.1 Parliament Hill summit to St Paul's Cathedral • VP 19 - Junction of Grafton Road/Queen's Crescent looking west and south • VP 20 - Grafton Street • VP 21 - Junction of Grafton Road/Warden Road looking west • VP 22 - Athlone Street looking east



Technical Topic	Change to the Scope of Assessment
	<ul style="list-style-type: none">• VP 23 - Allcroft Road looking south• VP 24 - Queen's Crescent• VP 25 - Talacre Road near to the junction with Wilkin Street• VP 26 - Rhyl Street• VP 27 - Bassett Street looking south towards school• VP 28 - Grafton Road and Queen's Crescent

All other topics previously scoped out will not be materially affected by changes to the Proposed Development, the format of the planning application and to policy and guidance, these will therefore remain 'scoped out' of the ES.

Cumulative Schemes

Any new cumulative schemes will be outlined and considered within the ES. Two additional cumulative schemes have been identified and will be included in the cumulative assessments of the ES. The additional cumulative schemes include:

- Highgate Studios – Planning Reference: 2023/1804/P; and
- 100 and 100a Chalk Farm Road - Planning Reference: 2024/0479/P.

Justification will be provided in each technical chapter of the ES on how these two schemes will be assessed.

A revised list of the cumulative schemes as set out within the EIA Scoping Report and the additional schemes requested within the EIA Scoping Opinion and subsequent correspondence between the Applicant's EIA team, LBC and their appointed third-party reviewer, an updated cumulative scheme list and map is presented within **Appendix 1**.

As the revisions to the Proposed Development are considered minor, the EIA Scoping Report and assessment proposed within the Environmental Statement remains valid. We consider the EIA Scoping Opinion issued by LBC on the 6 March 2023 (Planning Reference: 2022/5281/P) to also remain valid for the purposes of the EIA and trust this approach is acceptable.

EIA Scoping Opinion Response

The Applicant's EIA team have provided an initial response to the EIA Opinion issued against the EIA Scoping Report (Planning Reference: 2022/5281/P) submitted to LBC. This can be found within **Appendix 2**.

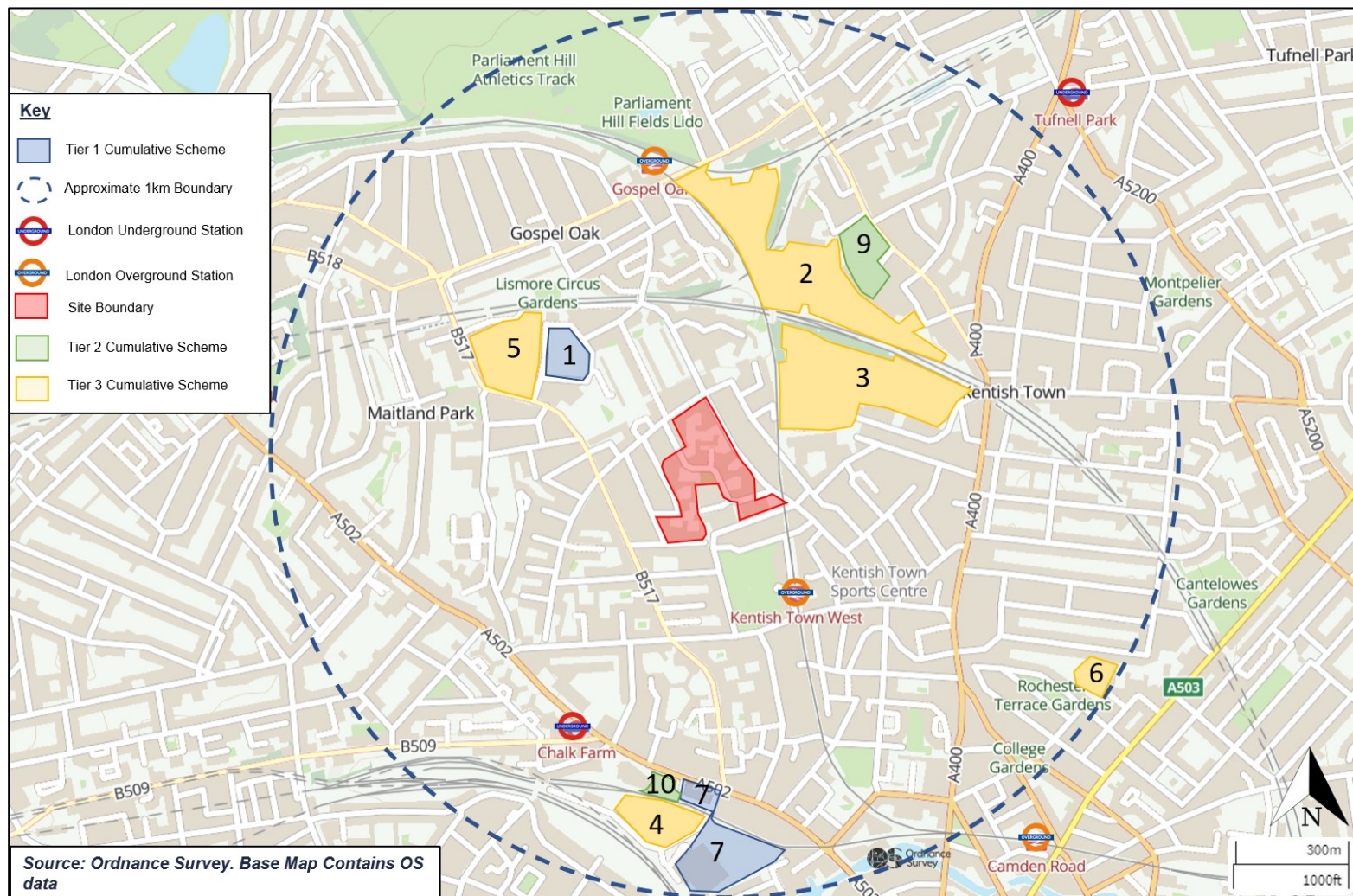
Should LBC wish to discuss the amendments proposed or the responses provided, then the Applicant's EIA team would welcome a call or meeting to discuss.

Kind Regards,

Chris Ellis

Associate
Trium Environmental Consulting LLP

APPENDIX 1: UPDATED CUMULATIVE SCHEME LIST AND MAP



1. Camden Collection – 2020/1019/P
2. Murphy's Yard – 2021/3225/P
3. Regis Road growth area – Allocated Site
4. CGY5 – Juniper Crescent – Allocated Site
5. IDS11 – Wending Estate and St Stephens Close – Allocated Site
6. IDS20e If for Evans Halls of Residence – Allocated Site
7. Camden Goods Yard – 2017/2847/P
8. The 02 Masterplan Site Fichley Road – 2022/0528/P
9. Highgate Studios – 2023/1804/P
10. 100 and 100a Chalk Farm Road – 2024/0479/P

West Kentish Town EIA Scoping Opinion Response

Comment Provided by:	EIA Scoping Opinion	EIA Response
The Proposed Development and Planning Application		
LBC Appointed ES Reviewer	The ES should include a description of the quantum, massing, form and layout of the development. This should include 1) the fixed details being put forward for the detailed component; and 2) the parameter plans, maximum (and potential minimum) quantum and design guidelines for the outline component. The description of the development will need to be further developed in the ES itself and should be clear on: 1. Demolition of any above ground structures, beyond the existing residential units; 2. The maximum lateral extent and depth of the basement (within a basement parameter plan for the outline components and basement layout plan for Phase 1); 3. Maximum height and footprints of plots / buildings (indicated on outline parameter plans and detailed plans for Phase 1); and 4. Floor area (i.e. GEA) proposed for different land uses (including maximum, and potential minimum, floor areas for the outline components).	These details will be provided within ES Volume 1, Chapter 2: EIA Methodology and ES Volume 1, Chapter 4: The Proposed Development , and the Design and Access Statement which will be submitted as a standalone planning document.
	If the decanting strategy is phased and parts of the existing development is still in occupation, whilst demolition and construction works are progressing, then these remaining occupied areas should be assessed as a receptor, where appropriate, during demolition and construction.	Noted. The technical assessments will consider any existing and introduced receptors given the length of the build out period with residents moving back to site into the newly constructed blocks whilst the rest of the demolition and constructions works are still ongoing. Existing receptors within the site boundary while works are ongoing will also be assessed.
	Reference is made to the development being phased. A demolition and construction phasing plan should be included, and assessed, in the ES. The construction assessment in each technical assessment should include an intermediate year construction assessment, that looks at the impacts and effects to occupants of the earlier phases (that have been built and occupied) within the proposed development (introduced receptors). This should consider construction disturbance from the construction of adjacent and subsequent phases, typically for a worst-case scenario, appropriate to each technical area on review of the planned phasing.	Noted. An indicative phasing plan will be provided as part of ES Volume 1, Chapter 5 Demolition and Construction . The phased nature of the Proposed Development delivery will be assessed as part of the technical demolition and construction assessments within the Environmental Statement. These technical assessments will consider a scenario where introduced receptors are expected to be affected worst throughout the demotion and constructions works with the effects appropriately identified. The phasing plan and programme prepared are indicative for the purposes of assessment within the EIA only.
Planning Context		
LBC Appointed ES Reviewer	The information included in this section is considered appropriate. However, each technical assessor should in addition be cognisant of the requirements of planning policy and guidance in the development of mitigation for the proposed development.	Noted.
EIA Methodology – Baseline Conditions		
LBC Appointed ES Reviewer	Paragraph 48 of the EIA Scoping Report identifies that a future baseline will be considered. Commentary should be provided in each of the technical assessments on how the baseline conditions could change from the current baseline in the future. How baseline conditions could change (without the development going ahead) by the year of full completion, would be a relevant benchmark, for example. It is acknowledged that material changes could occur for some disciplines, but not necessarily all. Commentary should be made on whether such changes could affect the receptor sensitivity that has been identified during the existing baseline review.	Noted. This will be clearly set out within each of the relevant technical ES chapters.
EIA Methodology – Demolition and Construction		
LBC Appointed ES Reviewer	Paragraph 57 of the EIA Scoping Report mentions that where required, monitoring arrangements will be presented in the ES. Commentary should be provided on whether the technical consultant recommends the need for any monitoring of significant residual effects, if there is the potential for these to remain as significant post-mitigation.	Any specific mitigation and monitoring measures that are required will be set out within the technical ES chapters and summarised within ES Volume 1, Chapter 16: Environmental Management, Mitigation and Monitoring Measures .
EIA Methodology – Environmental Design Management Measures		
LBC Appointed ES Reviewer	The information included in this section is considered appropriate. It should be noted that any measures that are assumed to be committed to during construction or operation, should be clearly set out and deliverable, given that they will need to be secured in the way of a planning obligation. This clarity will be important if they are not inherently part of the detailed design for Phase 1 or parameter plans / design code for the outline parameters.	Noted. Any best practice environmental management, mitigation or monitoring measures associated with the demolition and construction stages of the Proposed Development will be set out within ES Volume 1, Chapters 6-13 (the technical ES chapters) under 'Embedded Mitigation'.
EIA Methodology – Completed Development		
LBC Appointed ES Reviewer	The ES should include a description of the quantum, massing, form and layout of the development. This should include the fixed details being put forward for the detailed component and the parameter plans, maximum (and potential minimum) quantum and design guidelines for the outline component.	A description of the Proposed Development in accordance with these requirements will be set out within ES Volume 1, Chapter 4: The Proposed Development .
	As described in the EIA Scoping Report, a realistic worst-case scenario should be assessed for each of the technical assessments. If there is the potential for a lower quantum to be delivered which may lead to different effects, then this should also be considered. For example, a realistic lower limit for floor area and residential units to be delivered for the outline components should be assessed in the socioeconomics assessment if this will potentially lead to an effect that is different (but represents the worst case, i.e., provision of less homes etc) to the delivery of the maximum quantum proposed.	The overall approach to assessing the detailed and outline components of the planning application will be provided within ES Volume 1, Chapter 2: EIA Methodology . Where appropriate, technical assessments will consider a realistic worst-case scenario to ensure effects are correctly identified. The methodology undertaken for each of the technical assessments will be included within ES Volume 1, Chapters 6-13 .
Cumulative Effects		
LBC Appointed ES Reviewer	The more general criteria included in the EIA scoping report is considered appropriate, however LBC will require the assessment of the following as discussed with the applicant (this is consistent with other EIAs progressed in LBC): 1. Tier 1 cumulative schemes: <ul style="list-style-type: none">• Schemes with planning consent or a resolution to grant 2. Tier 2 cumulative schemes: <ul style="list-style-type: none">• Schemes with a submitted planning application which are awaiting determination 3. Tier 3 cumulative schemes: <ul style="list-style-type: none">• Schemes that are known to be coming forward in the local area or that are allocated within the LBC Site Allocations Plan or draft Site Allocations Plan	A revised cumulative scheme list has been produced and included within the ES following further discussions with Camden and relevant stakeholders as part of the EIA process. Additional schemes are presented within the EIA Scoping Addendum, to be agreed. Certain schemes requested have not been included within the cumulative effects assessment where significant cumulative effects are demonstrated to be unlikely. This justification has been provided within the revised list. This full list of cumulative schemes considered as part of this process is included as an Annex to this response. For the schemes that are being included, the list sets out the proposed approach for assessing the cumulative schemes using a tiered cumulative assessment.

West Kentish Town EIA Scoping Opinion Response

Comment Provided by:	EIA Scoping Opinion	EIA Response
	4. Local Infrastructure Initiatives that could affect the highway and pedestrian networks in the vicinity of the proposed development / area of study. The above categories can be assessed using a scenario-based approach, so that the ES has due regard to the different levels of known information at this stage and the range of cumulative effects that could occur.	At the time of writing, no schemes would fall within Tier 2 defined at EIA scoping (<i>Schemes with a submitted planning application which are awaiting determination</i>). Therefore Tier 3 has been referenced as Tier 2 throughout the ES. A review of publicly available information and consultation with the Applicant Team's transport consultant has confirmed that there are no local infrastructure initiative that could affect the highway and pedestrian networks in the vicinity of the proposed development / area of study. Therefore, no further assessment of infrastructure initiatives has been considered as part of the ES. For some of the schemes requested, there is insufficient information available to undertake a reasonable assessment within the Cumulative Effects Assessment. However, a qualitative judgment has been made where possible on the potential for cumulative effects which would be considered significant. Any future planning applications that are submitted in accordance with these allocated sites under the Local Plan would need to consider any likely significant cumulative effects together with the Proposed Development (if consented).
	'Reference is made to assessing schemes with a full planning consent. To be clear, we would also expect that outline planning consents are also assessed, if they breach the wider criteria set out in the EIA Scoping Report.	The completed list as discussed with LBC is provided as an Annex to this response. The schemes in the cumulative scheme list have been included, where relevant, based on exceeding the relevant EIA cumulative assessment thresholds and their potential for significant cumulative effects. This is inclusive of both full and outline applications / consents where relevant. Based on the time of the production of the cumulative scheme list, there are no outline planning applications on Camden's planning system which meet the criteria for inclusion within the assessment.
	The list of proposed cumulative development schemes included in the EIA scoping report should be reviewed against the criteria above (Tier 1-3 and Local Infrastructure Initiatives that could affect the area of study). The list of proposed developments to be assessed should be re-reviewed (against the specified criteria) ahead of commencing the assessment work if there is a delay between the issue of this EIA scoping opinion and the assessment work commencing. This list can be further discussed with LBC at that time. This will ensure that the list of cumulative development schemes is as up to date as possible at the time of the assessment work commencing.	Noted.
	For the schemes identified, the EIA should be cognisant of any variations to consents, that may be material to the cumulative assessment: for example, consents approved via Section 73 of the Town and Country Planning Act 1990.	Noted.
	Whilst not part of the cumulative assessment, the technical assessments should have regard to impacts and effects to any future receptors in the vicinity of the site that may be affected. Specifically, this may include nearby planning applications / permissions that are lower than the thresholds defined in the EIA Scoping Report.	Where possible, and where information is publicly available on cumulative schemes, future receptors will be considered as part of the 'Assessment of the Future Environmental' section of technical ES chapters. Due to the residential nature of the surrounding area the majority of existing receptors have been considered to be of high sensitivity. Therefore, should there be any potential schemes which could introduce receptors in the future lower than the thresholds defined in the EIA Scoping Report for cumulative schemes, a reasonable worst case has been considered (where appropriate). Cumulative schemes which do not fall within the thresholds for inclusion in the cumulative effects assessment are typically not considered in detail given that the potential for likely significant cumulative effects is not considered likely.
	The ES should outline where any of the earlier phases of the identified cumulative schemes are constructed and occupied, and therefore considered to form baseline for the assessment. The assumed construction phasing of nearby cumulative developments should be outlined in the ES and where this is not clear from the associated planning documentation for those schemes, details should be provided on any assumptions made i.e. the potential for overlap of construction phasing if this represents a worst case for assessment purposes.	Where cumulative schemes are considered to fall within the baseline and assessed within the main assessment, this will be noted as relevant through the ES. It is not considered necessary to set out the phasing/ programme of each cumulative scheme, however, an assumption would be made that there is the potential for construction programmes to overlap with the Proposed Development, within the ES.
LBC Urban Design Officer	As below, the LBC urban design officer has flagged that the Regis Road site should also form a cumulative scheme for assessment. LBC Urban Design officer response <i>Cumulative effects:</i> <i>Like Murphy's Yard, the Regis Road site is allocated for development - see SALP and Kentish Town Planning Framework. Whilst Regis Road is at a very early stage of planning, and therefore full assessment of the cumulative impacts cannot be undertaken, it should be identified in the same way as Murphy's Yard.</i>	This scheme would be assessed in a qualitative manner in Tier 2.
Alternatives and Design Evolution		
LBC Appointed ES Reviewer / LBC Urban Design Officer	As per the EIA Regulations, the ES should include "a comparison of the environmental effects" when considering alternatives, as the EIA Scoping Report highlights. The ES, when discussing how the design has changed, should therefore include commentary on whether any potentially significant effects were avoided / present, for the relevant iterations outlined, when compared to the chosen proposed development submitted for planning. The LBC Urban Design officer has requested that retention (refurbishment/extension/infill options) should be considered within the alternatives and design evolution ES chapter, as below. LBC Urban Design officer response <i>Design alternatives and evolution:</i> <i>This should include the refurbishment/extension/infill options that have been considered demonstrating the impacts on sustainability and placemaking.</i>	Noted. The options considered for redeveloping the site will be discussed within ES Volume 1, Chapter 3: Alternatives and Design Evolution with detail provided as to why full redevelopment was considered the best option and ultimately taken forward.
Determining Effect Significance – Effect Scale		
LBC Appointed ES Reviewer	The information included in this section is considered appropriate. However, if certain disciplines use different terminology/definitions than those presented in the EIA Scoping Report, as the EIA Scoping Report alludes to, it should be made clear which effects are considered to be significant, given that paragraph 104 in the EIA Scoping Report defines moderate and major effects as significant.	Following identification of an effect, the effect scale, nature, geographic extent and duration and whether the effects are direct or indirect, a clear statement will be made within the ES as to whether the effect is significant or not significant. As a general rule, the following applies: <ul style="list-style-type: none">• 'Moderate' or 'major' effects are deemed to be 'significant';• 'Minor' effects are 'not significant', although they may be a matter of local concern; and• 'Negligible' effects are 'not significant' and not a matter of local concern. Where this differs for a particular technical assessment/s, an explanation will be provided within the methodology section of the relevant topic's ES chapter.
Determining Effect Significance – Effect Nature		

Comment Provided by:	EIA Scoping Opinion	EIA Response																										
LBC Appointed ES Reviewer	The information included in this section is considered appropriate. Whilst the ES highlights that the effects will be classified as adverse, neutral or beneficial, this is sometimes not consistently applied to all effects reported in an ES. These definitions should be clearly applied to all effects reported in the ES, i.e. cumulative effects in addition to the effects of the proposed development in isolation.	Noted.																										
Determining Effect Significance – Geographic Extent of Effect																												
LBC Appointed ES Reviewer	The information included in this section is considered appropriate. Whilst the ES highlights that the effects will be classified as site, local, district/borough or regional, this is sometimes not consistently applied to all effects reported in an ES. These definitions should be clearly applied to all effects reported in the ES, i.e. cumulative effects in addition to the effects of the proposed development in isolation.	Noted.																										
Determining Effect Significance – Effect Duration																												
LBC Appointed ES Reviewer	<p>The EIA Scoping Report includes the following statement: “.. effects that are generated as a result of the demolition and construction works (i.e. those that last for this set period of time) will be classed as ‘temporary’; these maybe further classified as either ‘short term’ or ‘medium-term’ effects depending on the duration of the demolition and construction works that generate the effect in question. Effects that result from the completed and operational phases of the Proposed Development will be classed as ‘permanent’ or ‘long-term’ effects.”</p> <p>Whilst this is broadly agreed, it should be noted that permanent effects could occur as a result of demolition and construction works (i.e. where an asset or receptor has been changed permanently).</p> <p>For the topics scoped into the ES, this could for example be relevant to heritage – i.e. any indirect effects associated with demolition of the existing buildings on site on the setting of the adjacent conservation area and nearby listed buildings. This may not be the case in reality, however the ES should be open to the possibility of demolition and construction works leading to permanent environmental effects.</p> <p>Whilst the ES highlights that the effects will be classified as temporary or permanent and short-term, medium term and long-term, this is sometimes not consistently applied to all effects reported in an ES.</p> <p>These definitions should be clearly applied to all effects reported in the ES, i.e. cumulative effects in addition to the effects of the proposed development in isolation.</p>	<p>Noted.</p> <p>The definitions for significance will be defined within ES Volume 1, Chapter 2: EIA Methodology. Where there are instances where definitions are different to that included within ES Volume 1, Chapter 2: EIA Methodology, this will be defined in the relevant ES chapter.</p>																										
Determining Effect Significance – Direct and Indirect Effects																												
LBC Appointed ES Reviewer	The information included in this section is considered appropriate. Whilst the ES highlights that the effects will be classified as direct or indirect, this is sometimes not consistently applied to all effects reported in an ES. These definitions should be clearly applied to all effects reported in the ES, i.e. cumulative effects in addition to the effects of the proposed development in isolation.	Noted.																										
Air Quality																												
LBC Sustainability Officer Response	<p>Comment 3: Air quality has been scoped in and states in Appendix A that “10 The Air Quality assessment will use the predicted future air quality conditions as a baseline from which to determine the effects of the completed and operational Proposed Development.” It should be noted that CPG Air Quality states clearly that “Modelling should not predict improvements to future years (future vehicle emissions or future background concentrations).”</p> <p>ACTION: CPG Air Quality should be followed and modelling should not predict improvements.</p>	<p>It is noted that CPG ‘Air Quality’ specifies that “Modelling should not predict improvements to future years (future vehicle emissions or future background concentrations)”.</p> <p>Whilst the concept of a precautionary principle in regard to air quality modelling is understood, applying this to the assessment presented within the Air Quality ES assessment is not considered appropriate for the following reasons:</p> <ul style="list-style-type: none">The approach outlined in the guidance cannot be justified from trends in monitoring data across the UK. Data for the nearest monitoring site to the proposed development with long-term measurements (CA16) are shown in the table below; the reduction in measured concentrations is evident since 2017. Indeed, Camden’s own Annual Status Report states “The continued reduction in NO2 concentrations over the past seven years is clear”. <table><tr><th rowspan="2">Site</th><th colspan="8">Measured NO2 Concentration (ug/m³)</th></tr><tr><th>2014</th><th>2015</th><th>2016</th><th>2017</th><th>2018</th><th>2019</th><th>2020</th><th>2021</th></tr><tr><td>CA16</td><td>57.8</td><td>63.6</td><td>58.7</td><td>68.8</td><td>54.7</td><td>45</td><td>33.4</td><td>32.4</td></tr></table> <ul style="list-style-type: none">At a London authority level, analysis has demonstrated that the introduction of the ULEZ and LEZ has reduced concentrations of NO2 in Inner London by 21% since 2021; this is likely to continue given that it has been announced that the ULEZ will expand further to encompass all of London in August. The regeneration of the West Kentish Town estate will take place over a period of several years, thus by the time the development is fully operational, it is reasonable to assume that concentrations will have reduced further as a result of the wider ULEZ and other policy interventions (such as measures in Camden’s latest Air Quality Action Plan). These improvements are not currently accounted for in the EFT (v11.0) that will be used to calculate emission factors for the assessment, as such the use of the EFT is considered conservative.The construction of the Proposed Development will be phased over several years and are not expected to be fully complete and operational until 2044 (to be confirmed in the ES). NOx concentrations are most likely to decline more quickly in the future, on average, than predicted by the current EFT. Therefore, assuming no improvements in air quality (emissions and backgrounds) from 2019 to 2044 is very unrealistic (i.e., no change in air quality over a 25-year period). By doing so it does not take account of the decline in vehicle combustion emissions (newer vehicles with cleaner exhaust emissions) / uptake of electric vehicles / increase in sustainable transport modes etc.Should an exceedance of the objective be predicted, by applying this approach, it is not possible to forecast the duration of this exceedance as traffic emissions and background concentrations are held constant.	Site	Measured NO2 Concentration (ug/m³)								2014	2015	2016	2017	2018	2019	2020	2021	CA16	57.8	63.6	58.7	68.8	54.7	45	33.4	32.4
Site	Measured NO2 Concentration (ug/m³)																											
	2014	2015	2016	2017	2018	2019	2020	2021																				
CA16	57.8	63.6	58.7	68.8	54.7	45	33.4	32.4																				

Comment Provided by:	EIA Scoping Opinion	EIA Response
		Therefore, it is the Air Quality Consultants (AQC) professional opinion that the approach outlined in CPG 'Air Quality' is overly conservative and unsupported by the empirical evidence. The Air Quality assessment will use the predicted future air quality conditions as a baseline from which to determine the effects of the completed and operational Proposed Development.
	<i>Comment 4: Consideration should be given to how air quality is intended to be analysed (London Plan section 9.1.13). Given the lack of air quality monitoring in the proximity of the development we would encourage installation of air quality monitoring of NO2 and particulate matter for at least 12 months to verify modelling and improve analysis. ACTION: Local Air quality monitoring should be undertaken to verify modelling.</i>	<p>The London Borough of Camden is currently undertaking long-term monitoring at a number of automatic and diffusion tube monitoring sites within its administrative boundary. Whilst there are not any monitoring sites within the immediate vicinity of the Proposed Development, there are monitoring sites within 3km in locations with similar air quality conditions to the application site, i.e., at a distance from any nearby major sources of pollution.</p> <p>Given the fact that these monitoring sites have been deployed for a number of years (i.e., long-term), and that the verification of the modelled results will utilise 2022 (or 2023 should data be available) as the baseline year, the judgement of the air quality consultant is that undertaking a monitoring survey is not necessary. Instead, the sites that are deemed representative of conditions at the Proposed Development will be used in the verification, where traffic information in the London Atmospheric Emissions Inventory (LAEI) for the roads adjacent these sites is available.</p> <p>Air quality monitoring (and subsequent verification) for NO₂ and particulate matter as part of future demolition and construction stages is expected to form a commitment by the Applicant as part of the Environmental Statement which will accompany the planning application.</p> <p>In order to ensure this monitoring is completed, the Applicant is already in discussions with Camden's Air Quality Officer for the provision of air quality monitoring to commence. This is expected to include monitoring before/during construction (which is likely to cover particulate matter/dust).</p>
	<i>Comment 5: Consideration should be made to the WHO Guideline values in place at the time of the publication of the London Plan 2021. For the assessment of impacts of a development on PM2.5 – the 2005 WHO guideline value of 10 µg/m3 should be used as the Air Quality Assessment Level, i.e. the impact descriptors (EPUK/IAQM) should be those relevant to 10 µg/m3. This means that a smaller contribution from a development to PM2.5 would be considered more severe than if the AQO of 25 µg/m3 were used. It should be noted that design features are preferable to energy intensive filtration systems where the guideline is exceeded.</i> <i>ACTION: Consideration of WHO Guideline Values required.</i>	The air quality assessment, included within ES Volume 1, Chapter 8: Air Quality will take consider the WHO guideline for using 10 µg/m3 for PM2.5. The modelling results will be compared with this value and results will be presented within the ES Chapter.
	<i>Comment 6: Due to the scale and location it is expected that that at planning stage the applicant will submit in line with Camden Planning Guidance and London Plan Guidance:</i> <ul style="list-style-type: none"><i>A detailed Air Quality Assessment</i><i>Air Quality Positive statement</i><i>Camden Air Quality proforma</i> <i>The following CPG should be considered when completing the profoma:</i> <ul style="list-style-type: none"><i>CPG Air Quality.</i>	The required elements in this comment have been prepared and will be submitted for the planning application.
Climate Change and Greenhouse Gas		
LBC Appointed ES Reviewer	Paragraph 3 (baseline conditions) suggests that where specific data on baseline transport and energy is not available, a baseline of zero shall be used. Rather than setting the baseline to zero, clearly defined assumptions and benchmarks should be used to estimate baseline conditions where site-specific data is unavailable.	The GHG assessment will follow the guidance on assessing greenhouse gas emissions as prescribed within the IEMA 2022 Guidelines ¹ . Where information is available the baseline GHG emissions will be calculated. However, according to the guidance, where information is not available, the 'current baseline' is to be considered as zero.
	Whilst it is acknowledged in paragraph 27 that the greenhouse gas emissions assessment shall consider the total whole life carbon footprint of the proposed development, the methodology for determining the significance of effects appears to consider emissions for the opening year only. In line with the IEMA Guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance 2 nd Edition (2022) guidance document, the significance of effects should be determined based on the whole life greenhouse gas emissions of the proposed development.	Noted. The assessment presented within ES Volume 1, Chapter 7: Climate Change will consider the significance of effects based on the whole life greenhouse gas emissions of the proposed development and the development emissions compared to the relevant years as set out in the carbon budgets.
	The criteria used for determining the significance of effects should be clearly defined within the ES chapter. This should consider the guidance and example criteria set out in section 6 of the IEMA (2022) guidance document.	Noted.
	The scope of the greenhouse gas emissions assessment is largely agreed, with smaller sources of emissions being scoped out. However, it is not clear whether the emissions associated with these sources meet the suggested criteria within the IEMA (2022) guidance document (i.e., where expected emissions are less than 1% of total emissions, and where all such exclusions total a maximum of 5% of total emissions). Further sources of greenhouse gas emissions that appear to be omitted, but lack discussion, are the end-of-life stage, benefits and loads beyond the system boundary and any carbon sequestration associated with green infrastructure. Where there is a lack of data about a particular source of emissions, clearly defined assumptions and benchmarks should be used to estimate emissions. Assumptions and reasoning for any sources of greenhouse gas emissions omitted from the assessment should be clearly set out in the ES chapter and any associated appendices.	Noted. Where there is a lack of data about a particular source of emissions, clearly defined assumptions and benchmarks will be estimated as part of ES Volume 1, Chapter 7: Climate Change with relevant technical data to be included within ES Volume 3, Technical Appendices .
	All sources of GHG emissions benchmarks and conversion factors should be made clear within the ES and a summary of any calculations should be appended to the ES.	Noted.
	It is agreed that item 1 can be presented as part of the alternatives and design evolution ES chapter, as stated within the EIA Scoping Report. However, the EIA Scoping Report does not set out the methodology that this element of the assessment shall follow. The IEMA (2020) guidance states that “project resilience to climate change impacts needs to be assessed as a part of the design (and is generally best reported in the analysis of alternatives). It is also better suited to a Risk Assessment type process than traditional EIA ‘determination of significance’”. Therefore, it is expected that a risk assessment shall be carried out, with the methodology and any assumptions made clearly set out.	Noted.
Noise and Vibration		

¹ IEMA 2022, Assessing Greenhouse Gas Emissions and Evaluating their Significance (2nd Edition).

West Kentish Town EIA Scoping Opinion Response

Comment Provided by:	EIA Scoping Opinion	EIA Response
LBC Pollution Planning Officer	Any technical submission should be prepared by a person with appropriate acoustic qualifications and should be with full regard to all relevant guidance including BS8233:2014 - Guidance on Sound Insulation and Noise Reduction for Buildings and BS4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound and policies A1 and A4 of the London Borough of Camden Local Plan 2017.	Noted, this will be the case and a Statement of Competence will be provided as part of the EIA.
	<p>Details should be submitted to the Council of the layout and internal arrangement within buildings. Details shall ensure that large family units are not situated above smaller units.</p> <ul style="list-style-type: none"> • Similar types of rooms in neighbouring dwellings are stacked above each other or adjoin each other. • Halls are used as buffer zones between sensitive rooms and main entrances, staircases, lift shafts, service areas and other areas for communal use. <p>Unless plans show a suitable layout of rooms, enhanced sound insulation between unsuitably stacked/adjoined rooms/areas will be required.</p> <p>No vibration should be transmitted to adjoining or other premises and structures through the building structure and fabric of this development as to cause a vibration dose value of greater than 0.4m/s (1.75) 16 hour day-time nor 0.26 m/s (1.75) 8 hour night-time as defined by BS6472 (2008) in any part of a residential and other noise sensitive property. All habitable rooms exposed to external transport noise in excess of 55 dBA Leq 16 hour [free field] during the day [07.00 to 23.00 hours] or 45 dBA Leq 8 hour [free field] at night [23.00 to 07.00 hours] should be subject to sound insulation measures to ensure that all such rooms achieve an internal noise level of 35 dBA Leq 16 hour during the day and 30 dBA Leq 8 hour at night. The submitted scheme should ensure that habitable rooms subject to sound insulation measures shall be able to be effectively ventilated without opening windows.</p> <p>A scheme should be submitted to support a full application to provide that the maximum day time noise level in outdoor living areas exposed to external road traffic/rail noise shall not exceed 50 dBA Leq 16 hour [free field].</p>	Noted. Refer to ES Volume 1, Chapter 9: Noise and Vibration which will provide an assessment of these considerations in regard to the site's suitability.
LBC Urban Design Officer	Fig 1 shows closest noise sensitive receptors. This should include residential properties and school to the south east of the site on Athlone Street/Grafton Road/Holmes Road - these are closer than properties on Malden Road that have been included, and are directly adjacent to Phase 1 land parcels.	Noted. A figure illustrating the sensitive receptors assessed will be presented within ES Volume 1, Chapter 9: Noise and Vibration .
Ecology and Biodiversity		
LBC Appointed ES Reviewer	The EIA Scoping Report confirms that protected species surveys are required for bats and that these surveys will be undertaken May to August 2023. As discussed with the applicant, the EIA process will need to have due regard to protected species. This should, therefore, include a confirmed understanding of presence – as informed by appropriate surveys, the development of appropriate mitigation reacting to the confirmed presence and the prediction of the likely significant effects as a result of these earlier stages. As discussed, and agreed with the applicant, the required bat surveys will be submitted with the planning application, as information submitted as EIA material / to satisfy the EIA Regulations, ahead of the planning application being determined. LBC Nature conservation have provided a response (below) which is also relevant to the timing of bat surveys. Natural England has provided comments (below), and guidance – included with their full response in Appendix A, that should be considered in the preparation of the ecology and biodiversity ES chapter.	Noted.
LBC Nature Conservation Officer	I'm assuming their concern was mainly regarding their approach to bats. This approach – to assume a worst-case scenario until surveys can be undertaken, is acceptable at this stage, but we will only be able to determine the app if either the surveys are completed and bats are absent, OR we have enough confidence in their mitigation proposals (either based upon worstcase scenario or positive survey results) such that mitigation will be sufficient. We would be unable to approve with a condition to the effect of 'develop bat mitigation plans'. However, I would assume that there is plenty of time for them to complete the bats surveys if they are only just at the scoping stage.	Noted.
Natural England	<p>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 [Natural England's letter is included as an Annex to this EIA Scoping Opinion] provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.</p> <p>Further guidance is set out in Planning Practice Guidance on environmental assessment, natural environment and climate change.</p>	Noted.
Socio-Economics		
Comments included as part of the EIA Scoping Opinion from LBC's <i>Economics Development Officer</i> , <i>Kentish Town Neighbourhood Forum</i> and <i>Housing Commissioning and Partnerships Team</i> were design matters and therefore we shared with the Applicants Design Team for consideration as part of the Proposed Developments evolution. Further details in regard to where measures have informed the evolution of the scheme will be presented within ES Volume 1, Chapter 3 Alternatives and Design Evolution .		
Human Health		
LBC Appointed ES Reviewer	<p>It is agreed that a dedicated human health ES chapter can be scoped out of the ES, if the standalone health impact assessment accompanying the planning application confirms that effects are indeed not predicted to be significant. However, as per IEMA guidance on "Effective Scoping of Human Health in Environmental Impact Assessment (2022)", if significant effects to human health are identified during the course of the assessment process either in the wider topic chapters in the ES or within the standalone Health Impact Assessment, these effects should be reported within a dedicated human health ES chapter included in the ES.</p> <p>Public Health England has provided comments that should be considered in the preparation of the health impact assessment outside of the EIA process.</p> <p>The Metropolitan Police Service has provided comments. These comments should be considered in the preparation of the health impact assessment outside of the EIA process and within the design development of the project.</p>	Noted.

Comment Provided by:	EIA Scoping Opinion	EIA Response												
Public Health England	<p>The Health Impact Assessment appendix to the EIA will need to take into account the potential statistical artefact impact on population health as a result of an increased population. The population in social housing tends to have poorer health than the general population. The current proposal seeks to more than double the number of homes. If residents in new homes have better health than existing residents, this will improve population health in the area irrespective of any improvements amongst existing residents.</p> <p>The HIA section should consider how the environment promotes good physical and mental health, including how it encourages active travel with good connectivity to/from and within the estate, healthy diets (e.g. food growing opportunities), opportunities to facilitate and encourage social connectivity and, for families with children, how active play can be facilitated.</p> <p>Opportunities might include, for example, designating the area a low traffic neighbourhood and installing a permanent play street (to prevent through traffic from outside of the area), including clear pedestrian routes to key destinations such as railway stations, Queens Crescent market and community centre, Talacre Town Green and Community Sports Centre, etc. This should also consider health inequalities, i.e. ensuring that the barriers to accessing opportunities by most vulnerable members of society are removed. Health, disability, and unpaid care at output area level from the 2021 Census is expected in January 2023.</p> <p>The impact on local health services should be taken into account in the HIA. The North Central London Integrated Care Board (with includes the former NHS Clinical Commissioning Groups) may submit an assessment on the potential impact on health services separately.</p> <p>When assessing access to primary care, the HIA section should quantify the likely impact on GP practices. Data on registrations by Lower Layer Super Output Area of residence give a picture of where current residents choose to register. Data on practice registrations and workforce published by NHS digital at www.digital.nhs.uk.</p> <p>I'm very happy to meet with those who will be developing the Health Impact Assessment and provide guidance etc.'</p>	Noted.												
Metropolitan Police Service Designing Out Crime Officer	<p>'Although I have had a meeting with the architects in reference to the initial phase of the development the rest is an outline proposal, as such my comments will be general to the area as befits a scoping opinion.</p> <p>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.</p> <p>Crime trends:</p> <p>The proposed location of the development lies to the South of Queens Crescent and is bordered to the East by Grafton Street and the West by Alcroft Road. The site extends to the edge of Athlone Street. It is a large and awkward site. Crime and anti-social behaviour are material considerations for this proposal, as seen from current crime figures. This area comes under the ward of Haverstock. The top reported crimes for this ward for the Month of December 2022 (taken from the police UK website were antisocial behaviour, violence and sexual offences, other theft and vehicle crime. Other offences of note for this ward include burglary, criminal damage and drugs.</p> <table><tr><th colspan="2">Top reported crimes</th></tr><tr><td colspan="2">Most commonly reported crimes during Dec 2022</td></tr><tr><td>Anti-social behaviour</td><td>26</td></tr><tr><td>Violence and sexual offences</td><td>24</td></tr><tr><td>Other theft</td><td>8</td></tr><tr><td>Vehicle crime</td><td>7</td></tr></table> <p>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.</p> <p>This location only a few streets away from Lismore Circus which has issues with gang activity, drugs and knife crime. I have recently conducted an environmental visual audit. This area garnered local press attention last year when the Mayor of London was present during a weapon sweep and two (2) zombie knives were discovered in close proximity to a children's play park. 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.</p> <p>Crime and ASB as material considerations for this site:</p> <p>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 (pages 62 and 66). Crime and disorder are relevant considerations and need to be addressed. In socioeconomic 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.</p>	Top reported crimes		Most commonly reported crimes during Dec 2022		Anti-social behaviour	26	Violence and sexual offences	24	Other theft	8	Vehicle crime	7	Crime preventions measures have been incorporated into the design of the Proposed Development. Specific details on these measures will be set out within the Design and Access Statement – Crime Impact Assessment which will accompany the planning application as a standalone deliverable.
Top reported crimes														
Most commonly reported crimes during Dec 2022														
Anti-social behaviour	26													
Violence and sexual offences	24													
Other theft	8													
Vehicle crime	7													
Heritage, Townscape and Visual Impact														
LBC Appointed ES Reviewer	There are no comments on the scope of this assessment, beyond those provided by the LBC Urban Design officer, LBC Heritage officer and Historic England as below. These comments should be addressed in the ES. Note specifically, LBC's	n/a												

West Kentish Town EIA Scoping Opinion Response

Comment Provided by:	EIA Scoping Opinion	EIA Response
	Design officer has requested the assessment of additional views, beyond those included in the EIA Scoping Report, which should be discussed further with the Design officer ahead of the ES being finalised.	
LBC Urban Design Officer	<p><i>In addition to the identified viewpoints, we request further views be assessed. Exact locations to be agreed with officers, but should include:</i></p> <ul style="list-style-type: none"> View from the junction of Grafton Road/Queen's Crescent looking west and south, as well as a kinetic view down Grafton Road View from the junction of Grafton Road/Warden Road looking west View along Athlone Street looking east View along Allcroft Road looking south <p><i>In order to assess the massing of proposed development, sections should be provided in addition to the views. This should comprise street sections and sections across the site showing the maximum parameters, and include the surrounding context.</i></p> <p><i>Full extent of proposed maximum parameters including allowances for plant should be assessed in townscape and visual analysis as well as daylight/sunlight/overshadowing/wind modelling. This will help to inform the maximum parameters across the site as it responds to local townscape and environmental conditions.</i></p> <p><i>The impact on trees should be tested at an early stage, particularly given the site levels and raised landscaping across the existing estate.</i></p> <p><i>There are a few inaccuracies in the document regarding their baseline information. I have not identified them all, but as an example:</i></p> <ul style="list-style-type: none"> Parliament Hill School is adjacent to William Ellis School - north of the site (26.p11 Table 1) The Grade I listed Church of St Martin is not included on the map (p.13 Fig 5) The Council adopted the Gospel Oak and Haverstock Community Vision as a Supplementary Planning Document (SPD) on 4 November 2022. (p.16 42. Local policy and guidance) 	<p>Within the scoping opinion, an additional four views were requested which included:</p> <ul style="list-style-type: none"> View from the junction of Grafton Road/Queen's Crescent looking west and south, as well as a kinetic view down Grafton Road View from the junction of Grafton Road/Warden Road looking west View along Athlone Street looking east View along Allcroft Road looking south <p>These views will be assessed within ES Volume 2, Heritage, Townscape and Visual Impact Assessment.</p> <p>An additional five were requested post-issue of the LBC Scoping Opinion which are:</p> <ul style="list-style-type: none"> View looking west on Queen's Crescent View north along Talacre Road near to the junction with Wilkin Street (Further north than no.10) View looking west along Rhyl Street showing the school View along Basset Street looking south towards school <p>These will also be included within the assessment.</p>
Historic England Response	<i>This development could, potentially, have an impact upon a number of 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.</i>	Full assessment on the identified receptors which may be impacted by the construction and completion of the Proposed Development will be included within ES Volume 2, Heritage, Townscape and Visual Impact Assessment of the ES.
	<i>We would also expect the Environmental Statement to consider the potential impacts on nondesignated 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</i>	Noted.
	<i>We would strongly recommend that you involve the Conservation Officer of London Borough of Camden and the archaeological staff at Greater London Archaeology Advisory Service (GLAAS) 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.</i>	As per the below response, the Conservation Officer from Camden has been consulted and has no objections on the proposed approach or identified receptors.
	<i>Given the heights of the structures associated with the proposed development and the surrounding landscape character, this development is likely to be visible across a very 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.</i> <i>It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.</i>	Full assessment on the impact to heritage assets because of the Proposed Development will be included within ES Volume 2, Heritage, Townscape and Visual Impact Assessment of the ES.
LBC Conservation Officer Response	<i>I have reviewed the Scoping Report and am satisfied that it identifies the areas of built heritage which will be affected by the proposed development, and the methodology to inform their assessment of the impact is appropriate.</i>	n/a
Daylight, Sunlight, Overshadowing and Solar Glare		
LBC Appointed ES Reviewer	<p>The inclusion of a daylight, sunlight and overshadowing assessment is considered appropriate. There are no specific comments on the scope of this assessment as set out in the EIA Scoping Report. Matters relating to solar glare and artificial lighting are considered further below.</p> <p>Unless it can be demonstrated that any potential glare sources identified are to be obstructed / not significant, a quantitative assessment will be required when facade designs are finalised for the detailed elements of the hybrid application and when reserved matters applications are submitted for outline elements of the hybrid application. This should include a quantitative assessment of the intensity of glare against a recognised threshold, above which visual impairment is likely.</p> <p>The intention to scope out light spill / artificial lighting from the ES is generally considered appropriate, however the ES should consider the comment raised by the West Kentish Town Conservation Area Advisory Committee (below) for the Conservation Area specifically as a receptor.</p>	Noted.

West Kentish Town EIA Scoping Opinion Response

Comment Provided by:	EIA Scoping Opinion	EIA Response
West Kentish Town Conservation Area Advisory Committee	<p><i>We object to the current proposed scope of the EIA, for the following reasons:</i></p> <p><i>LIGHT POLLUTION The scheme proposals include a large public space opening directly into Allcroft Road, which is part of the WKT CA. This space will be highly lit, and is likely to result in light pollution within the conservation area</i></p>	<p>Noted. However, lighting of any proposed open spaces as part of the Proposed Development will be subject to operational controls and will be detailed as part of future design stages if consented. Significant effects in relation to light pollution are those related to significantly lit commercial office schemes where external facades and/or internal lighting may impact surrounding sensitive receptors. As the Proposed Development does not include these types of operational lighting it is considered appropriate that light pollution is scoped out of the EIA.</p>
Wind Microclimate		
LBC Appointed ES Reviewer Wind Microclimate Team	<p>The scope proposed is generally considered appropriate for the wind microclimate assessment. However, there are a number of points raised below by Buro Happold's wind microclimate team (they have undertaken a peer review of the proposed scope), that should be addressed in the assessment.</p> <p>During pre-application discussions, the applicant confirmed that the height of Phase 1 is currently planned to be less than 50 metres above ground level and therefore it is agreed that the use of Computational Fluid Dynamics (CFD) modelling is considered appropriate.</p> <p>Comments raised by Buro Happold wind microclimate team:</p> <ul style="list-style-type: none"><i>The safety threshold should be set up to not exceed 1.9 hours per year for 15m/s.</i><i>Regarding comfort, the aim should be to keep velocities below 8 m/s within the public realm.</i> <p>Anything above this is likely to be uncomfortable and could be linked to safety issues. This threshold is aligned to the City of London Wind Microclimate Guidance, which whilst not applicable to Camden, does provide good practice precedent for wind microclimate guidelines within London.</p>	<p>As part of the evolution of the Proposed Development a request by the LBC to include an additional storey onto Block G1 was made and reflected in the final design. Although this has pushed the height to approximately +55m, CFD is still considered an appropriate methodology for the assessment.</p> <p>The safety and comfort thresholds will be set as per the Lawson Comfort Criteria as opposed to the City of London. The City of London Criteria has been specifically designed for the City itself and is not always suitable for comparison in other parts of London and throughout the UK and as such the Lawson Comfort Criteria will be used across the Wind Microclimate assessment for the EIA.</p>
Transport and Access		
LBC Appointed ES Reviewer	<p>Comments have been received from LBC's Transport officer (in relation to construction) and TfL (in relation to the public transport network during operation) on the intention to scope out transport, traffic and access from the ES (below).</p> <p>Given the nature of the response from LBC's transport officer and TfL, LBC will require any future ES to include a dedicated ES chapter on this topic. This should include demolition and construction effects and operational effects (specifically, in relation to impacts on the surrounding public transport networks).</p> <p>The dedicated transport and access ES chapter should clearly describe how the comments raised below have been considered in the assessment.</p> <p>A number of further comments have been raised by TfL (below), that should be considered in the preparation of the standalone (non-EIA) transport planning reports, including the Transport Assessment.</p> <p>West Kentish Town Conservation Area Advisory Committee has provided comments (below), including on the potential effects of delivery vehicles. Given that the LBC transport officer agrees that operational effects are unlikely to be significant, we recommend that such operational effects are considered as part of the preparation of the standalone Transport Assessment (a non-EIA document), which should confirm this to be the case.</p> <p>A comment has been made by LBC's Design Officer, as below, which should be considered when collecting baseline data for the TA and ES.</p>	<p>A Traffic and Transport ES chapter will be included. This chapter will assess the effects associated with the demolition and construction stages of the Proposed Development and the operational effects specifically from increased number of residents to existing public transport services.</p> <p>In line with the new IEMA guidance Environmental Assessment of Traffic and Movement, published in July 2023, an assessment of public transport impact i.e. capacity of services impact, will be undertaken within the Transport Assessment and will not be included within the Transport ES chapter. The impact of the proposals on users of public transport, for example people walking to / from stations and bus stops as non-motorised users of the highway network, will be considered within the Transport ES chapter.</p> <p>The guidance states at paragraph 1.15: "These Guidelines are not intended to extend to the wider (multi-modal) transport movement impacts of development projects (e.g. public transport and pedestrian comfort levels and safety).</p> <p>Typically, non-motorised user impacts (both beneficial and negative) are assessed within a formal 'Transport Assessment' which would inform a traffic and movement (or equivalent) chapter of an environmental statement or EIA report. The aim should also be to identify where the project can reduce reliance on vehicles or vehicle impacts, e.g. though promoted active travel and public transport. This could result in significant beneficial effects that cascade through, for example, the air quality, noise and human health assessments."</p>
LBC Transport Officer	<p><i>Regarding the operation of the proposed development, when completed, the expected trip generation of the additional dwellings would be around 3,000 movements (arrivals + departures) over a 12-hour day. As the development would be car-free, the vehicular traffic from person journeys would be minimal. The site is expected to generate circa 56 delivery vehicles per day, equating to 112 two-way movements per day. When complete, the proposal is not expected to produce significant transport effects on the environment, and it is therefore considered reasonable to scope out the operational transport impacts from the ES.</i></p> <p><i>The Scoping Report acknowledges that a planning application for the redevelopment of the site would need to be supported by a Transport Assessment (TA) and a Framework Travel Plan, Delivery and Servicing Management Plan and a Car Parking Management Plan.</i></p> <p><i>There are likely to be significant environmental impacts associated with the building of 880dwellings, including the demolition of around 300 existing dwellings. The scoping report proposes to scope out transport impacts from demolition and construction on the grounds of the long construction period (2024 – 2039). However, no quantitative analysis has been carried out and I am not persuaded that the Transport impact from demolition and construction would be insignificant. I would therefore recommend against scoping out transport impacts from demolition and construction.</i></p> <p><i>Paragraph 57 of the Scoping Report states: It is anticipated that any required demolition and construction related environmental management/ mitigation and monitoring measures would be secured and controlled through an appropriate Construction Environmental Management Plan (or equivalent) and it is proposed that the requirement for these documents be secured by means of suitably worded planning conditions to be attached to the permission. This needs to be corrected as Camden secures CMPs via S106 obligations rather than planning conditions.</i></p>	<p>A Traffic and Transport ES chapter will be included. This chapter will assess the effects associated with the demolition and construction stages of the Proposed Development and the operational effects specifically from increased number of residents to existing public transport services.</p> <p>In line with the new IEMA guidance Environmental Assessment of Traffic and Movement, published in July 2023, an assessment of public transport impact i.e. capacity of services impact, will be undertaken within the Transport Assessment and will not be included within the Transport ES chapter. The impact of the proposals on users of public transport, for example people walking to / from stations and bus stops as non-motorised users of the highway network, will be considered within the Transport ES chapter.</p> <p>The guidance states at paragraph 1.15: "These Guidelines are not intended to extend to the wider (multi-modal) transport movement impacts of development projects (e.g. public transport and pedestrian comfort levels and safety).</p> <p>Typically, non-motorised user impacts (both beneficial and negative) are assessed within a formal 'Transport Assessment' which would inform a traffic and movement (or equivalent) chapter of an environmental statement or EIA report. The aim should also be to identify where the project can reduce reliance on vehicles or vehicle impacts, e.g. though promoted active travel and public transport. This could result in significant beneficial effects that cascade through, for example, the air quality, noise and human health assessments."</p>
Transport for London Spatial Planning Response	<p><i>The proposed development is not located in close proximity to any sections of the Transport for London Road Network (TLRN) and therefore does not hold much strategic transport importance in relation to the London Plan. However, the development proposes to demolish all existing residential units whilst proposing approximately 898 dwellings. This may have significant impacts on surrounding public transport networks which include, Kentish Town West overground and underground station approximately 200m south-east of the site, Gospel Oak overground station approximately 500m north and Chalk Farm underground station (serving Northern Line) approximately 550m to the south-west. TfL has a statutory obligation to protect the railway and is therefore concerned with any developments which may impact railway services and stations.</i></p>	<p>A Public Transport Assessment will be undertaken as part of the Transport Assessment submitted to accompany the planning application.</p> <p>A Healthy Streets Transport Assessment will be provided as a separate planning deliverable accompanying the planning application.</p>

Comment Provided by:	EIA Scoping Opinion	EIA Response
	<p><i>It is understood 263 residential properties are currently occupied and 53 are currently leaseholder units. TfL request clarification on total number of existing, occupied and unoccupied residential units to be demolished and the net increase in residential units being proposed.</i></p> <p><i>We welcome that a Construction Logistics Plan, Residential Travel Plan and a Delivery and Servicing Plan is being prepared. The application should be supported by a full Healthy Streets Transport Assessment (TA). As part of TfL's ongoing work embedding Healthy Streets in London's planning system, there will be new guidance and resources for planning applicants at the TfL website, including Vision Zero and Road Safety Audit recommendations, a new Healthy Streets Transport Assessment template and advice on when and how Healthy Streets tools and guidance documents should apply to planning applications and policy.</i></p> <p><i>Please see here for TfL's guidance on TAs: https://tfl.gov.uk/info-for/urban-planning-andconstruction/transport-assessment-guide/transport-assessments?intcmp=10094.</i></p> <p><i>We would also like to see an Active Travel Zone (ATZ) assessment completed as part of this proposal, mapping all the key locations relevant to the development proposal. Please see here for further guidance: https://content.tfl.gov.uk/atz-assessment-instructions.pdf TfL recommends the applicant seeks advice via our full pre-application advice services, details available at https://tfl.gov.uk/info-for/urban-planning-andconstruction/planningapplications/ pre-application-services</i></p> <p><i>TfL will expect the proposal to support the strategic aim of the Mayor's Transport Strategy (MTS), which is for 80% of all trips in London to be made by walking, cycling or public transport by 2041 and to help deliver the Mayor's Vision Zero ambition of zero deaths and serious injury on London's transport network by 2041.</i></p> <p><i>Due to the size and location of the development, TfL recommend that the applicant seeks TfL strategic transport modelling. Please see here for further guidance: https://content.tfl.gov.uk/londons-strategic-transport-models.pdf</i></p> <p><i>We also offer an initial screening service which can help you prioritise transport issues and plan detailed analysis such as surveys, modelling and safety audits. Please see here for further information: https://tfl.gov.uk/info-for/urban-planning-andconstruction/planningapplications/ pre-application-services</i></p> <p><i>We would also recommend that the applicant engages in a GLA pre-app advice service.</i></p> <p><i>TfL have no further comments at this moment of time.'</i></p>	
West Kentish Town Conservation Area Advisory Committee	<i>We are very concerned about the impact of the proposed scheme on vehicular traffic in surrounding streets, specifically in the WKT CA. We cannot understand why it is proposed to exclude this within the scope of the EIA. The number of vehicles using the streets within the CA has increased due to the closure of Queens Crescent, a fact that is not mentioned in the document accompanying this application. Given the road closures, the impact of increased number delivery vehicles to the new development is likely to impact the streets of the conservation area, and therefore must form part of the EIA.</i>	An assessment during the demolition and construction stages of the Proposed Development will be included within the Traffic and Transport ES chapter.
LBC Urban Design Officer	<i>Baseline transport conditions are not up to date and do not include restrictions on Holmes Road, Queen's Crescent and Grafton Road. Due to the demolition/construction impacts and access restrictions in the area, this should be scoped in to the assessment</i>	As above.
Geo-Environmental (Ground Conditions, Groundwater and Soils)		
LBC Appointed ES Reviewer	It is agreed, that subject to the measures outlined and committed to in the EIA Scoping Report being developed and agreed with LBC's Environmental Health / Contaminated Land officer, that significant effects relating to ground contamination are unlikely to arise. Therefore, it is agreed that this topic can be scoped out of the ES. The LBC Environmental Health Officer response is included below. They will need to review and sign off the remediation strategy and verification report in the future, which can be secured via appropriately worded planning conditions.	Noted.
	Comments have been provided by the West Kentish Town Conservation Area Advisory Committee which should be considered in the non-EIA geoenvironmental reporting.	Noted.
LBC Contaminated Land Officer Response	<p>PART 1 - Introduction</p> <p><i>Historical industrial land uses have been identified on site and immediately adjacent to the site, including printers, cycle manufacturers, coal and coke merchants, motor engineers and various works and factories. There is also the potential for elevated concentrations of heavy metals (primarily lead) within the background concentrations of Camden soils. Previous development has historically occurred on site, and hence there is the potential for made ground and associated contaminants of concern beneath the site. Given the proposed residential development including basements and soft landscaping (including garden areas), we recommend the contaminated land condition below.</i></p> <p>PART 2 – Condition</p> <p><i>In principle there is no objection to the proposal subject to the condition recommended below:</i></p> <p>Land Contamination Risk Assessment</p>	Noted.

Comment Provided by:	EIA Scoping Opinion	EIA Response
	<p>Part A:</p> <p>No development shall commence until a preliminary risk assessment report is submitted to and approved in writing by the local planning authority. This report shall comprise: a desktop study which identifies all current and previous uses at the site and surrounding area as well as the potential contaminants associated with those uses. A conceptual site model should be produced indicating potential pollutant linkages between sources, pathways and receptors, including those in the surrounding area and those planned at the site; and a qualitative risk assessment of any potentially unacceptable risks to identified receptors. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>Subsequent parts are subject to the findings of the desk study:</p> <p>Part B:</p> <p>No development shall commence until a site investigation is undertaken and the findings are submitted to and approved in writing by the local planning authority. The site investigation should assess all potential risks identified by the desktop study and should include a generic quantitative risk assessment and a revised conceptual site model. The assessment must encompass an assessment of risks posed by radon and by ground gas. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>Part C:</p> <p>No development shall commence until a remediation method statement (RMS) is submitted to and approved in writing by the local planning authority. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment. This document should include a strategy for dealing with previously undiscovered contamination. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>Part D:</p> <p>Following the completion of any remediation, a verification report demonstrating that the remediation as outlined in the RMS have been completed should be submitted to, and approved in writing, by the local planning authority. This report shall include (but may not be limited to):</p> <p>details of the remediation works carried out; results of any verification sampling, testing or monitoring including the analysis of any imported soil and waste management documentation. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.</p>	
West Kentish Town Conservation Area Advisory Committee	GEO-ENVIRONMENTAL Memories of local people suggests that the tributaries of the Fleet River affect the area. Given this, a thorough assessment of the ground conditions would be advisable, especially as basements are proposed.	The River Fleet which has been noted to have historically run close to or under the site, has now been culverted and forms part of the River Fleet sewer located to the east of the site. No further action required with regard to the ES.
Waste and Materials		
LBC Appointed ES Reviewer	<p>It is agreed, that subject to the measures outlined in the EIA Scoping Report being put in place, significant effects relating to solid waste and materials are unlikely to arise and that therefore this topic can be scoped out of the ES.</p> <p>The LBC Sustainability officer has signposted the need for a Circular Economy Statement including a demolition audit to be considered beyond the EIA process.</p> <p>Comments have been provided by the West Kentish Town Conservation Area Advisory Committee.</p> <p>These comments should be considered in the development of the standalone planning reports that consider waste.</p>	A Circular Economy and Sustainability Statement will be submitted as a standalone planning document accompanying the planning application.
West Kentish Town Conservation Area Advisory Committee	The scheme should address the need to limit waste through unnecessary and damaging forms of construction. This impacts the environment globally due to resource extraction (currently causing extinction of species and threatening the ability of the planet to provide a liveable environment).	<p>ES Volume 1, Chapter 5: Demolition and Construction will confirm that the Principal Contractor would need to focus on the Climate Emergency and the need to minimise carbon emissions associated within the demolition and construction works. The detailed Construction Management Plan, which would be secured through a s106 agreement, should the Proposed Development receive consent, will set out the specific details on the approach for resource efficiency which will include sourcing local materials (including labour), auditing of materials and options for re-use of supplies.</p> <p>A carbon foot printing procedure would also be undertaken that would minimise the carbon demands of the Proposed Development, identify the use of renewable energy resource and incorporate efficient energy supply and low carbon technologies during the demolition and construction works.</p> <p>The tender process for Contractor procurement would ensure that construction sustainability was an important aspect of the scoring, and LBC would look to explore Contractor's policies surrounding the topic and challenge them to make even greater improvements in energy and material use on site.</p>
Water Resources, Drainage and Flood Risk		
LBC Appointed ES Reviewer	<p>As is proposed in the EIA Scoping Report, measures for dealing with demolition and construction related water pollution, to be included in a Construction Environmental Management Plan, should be included in the ES.</p> <p>The comments from the LBC Sustainability Officer (below) have highlighted the potential requirement for undertaking detailed surface water modelling for the development area, to fully inform the Flood Risk Assessment and Drainage Strategy to be submitted with the planning application. This should be discussed further with LBC in its role as Lead Local Flood Authority (LLFA) to agree a scope of assessment. In addition to an appropriate scope for the FRA and Drainage Strategy being agreed with the LLFA, these documents should also confirm that significant drainage and flood risk effects will not likely occur with the proposed development, if flood risk and drainage is to be scoped out of the ES. Assuming that the FRA and Drainage Strategy are developed in such a way that Flood Risk and Drainage effects are not likely to be significant,</p>	The Sustainable Drainage Systems Report will include drawings and calculations for the Proposed Development and therefore it is considered that this information is sufficient and addresses the request for undertaking of detailed surface water modelling for the development area.

Comment Provided by:	EIA Scoping Opinion	EIA Response
	<p>and these documents demonstrate this position, then it is agreed that a dedicated ES Chapter on water resources, drainage and flood risk can be scoped out of the ES.</p> <p>Comments have been provided by the EA and the West Kentish Town Conservation Area Advisory Committee which should be considered in the development of the drainage strategy and FRA. Thames Water has confirmed (below) that they are satisfied with the EIA Scoping Report.</p>	
LBC Sustainability Officer	<p><i>Floods and SuDS</i></p> <p>Comment 1: Water Resources, Drainage and Flood Risk Section 40 (Page 5) of the report concludes that Flood Risk has been scoped out of the EIA. However further consideration should be made to the following:</p> <ul style="list-style-type: none">• It has been clarified in the Addendum that some basement development is now proposed.• Historically the River Fleet was fed by tributaries from the Highgate and Hampstead ponds (see map below), the tributary from the Hampstead ponds ran through the area. The Strategic Flood Risk Assessment (SFRA) section 2.8.3 states that “The River Fleet became entirely enclosed in the 19th Century and is now fully incorporated into the TWUL (Thames Water) sewer network, eventually out-falling into the River Thames under Blackfriars Bridge”.• The SFRA also provides a map of the culverted watercourses.• It should be noted that Camden’s Flood Risk Management Strategy states in section 3.1.6 that “While the courses of the culverted rivers often correspond with levels of heightened flood risk, this is due to topography (rivers sit in low lying areas) rather than from the river itself.”	Noted.
West Kentish Town-Conservation Area Advisory Committee	<p>There is already localised flooding in Coity Road when it rains very heavily. At present the green spaces on WKT estate provides rainwater attenuation. If the area of permeable open green space is reduced the capacity of the existing drainage system will be reduced, with increased risk of flooding in the area.</p>	Refer to the Sustainable Drainage Systems Report which will be submitted as a standalone planning deliverable to accompany the planning application for further detail.
Statutory Consultees		
Queen’s Crescent Neighbourhood Forum	<p>No viable and reasonable alternative to total demolition was offered at the time of the residents’ ballot. LBC asserts that residents voted overwhelmingly for demolition and rebuilding. There’s evidence tenant residents saw this option as the only way out of dire living conditions in poorly maintained and overcrowded flats.</p> <p>The EIA proposes that both potential noise and vibration effects during the operational phase, and an assessment on operational road traffic noise are scoped out. No supporting data to this statement is offered and for such a huge development must be included.</p> <p>8. Socioeconomics</p> <p>The EIA proposes that an assessment on; a) end-use employment, b) Dentists, Nurseries, Leisure and other Community Facilities, c) Crime, are deemed not likely to be significant and are scoped out. There is no supporting data to these statements and must be included for such a huge development in one of the most deprived areas of London.</p> <p>9. Public Health</p> <p>The impact on health as a result of an increased population and how the scheme will promote good physical and mental health needs to be assessed, eg. the existing games court is to be removed and replaced so will need to meet the requirements of the National Planning Policy Framework (NPPF). If existing sports facilities (eg. Talacre) do not have the capacity to absorb the additional demand, then new and/or improved sports facilities should be provided.</p> <p>10. Heritage, townscape and visual impact</p> <p>The current over-development and scale of the proposals will adversely affect designated heritage assets, (conservation areas, listed and locally listed buildings etc), their setting and significance both around the site and across a very large area to some distance. In line with the NPPF, a thorough assessment of the likely effects is essential.</p> <p>11. Daylight, sunlight, overshadowing</p> <p>Due to the scale of development it is important to identify which properties both within and adjacent to the estate, would experience light changes above 20% rather than vaguely state that they may experience unacceptable overshadowing. The proposed design also destroys open sided, publicly accessible/viewable landscape, replacing it with deep-set courtyards surrounded by tall blocks. These will receive no/minimal sunlight and will be no use as gardens or social spaces. The high level of lighting proposed to the public spaces will also fundamentally alter the quality of the area and create light pollution.</p> <p>12. Water resources, drainage and flood risk</p> <p>These must be scoped in. EA’s Water Stressed Areas report (2021) notes the site suffers from ‘serious water stress’, i.e., the availability of mains drinking water supply is limited. The development will also increase the load on the existing foul sewage network. A thorough consultation with Thames Water on capacity and constraints on foul and surface water is fundamental.</p>	<p>Alternatives and Design Evolution:</p> <p>The options for redeveloping the site with explanation as to why full redevelopment of the site has been chosen is presented within ES Volume 1, Chapter 3: Alternatives and Design Evolution.</p> <p>Noise and Vibration:</p> <p>Given the proposed plant and limits of noise produced from the plant, the professional opinion considers that any effects from the operation of this plant would not be significant. The controls to these plant limits will be set out within the Environmental Statement. It is not considered that supporting data is needed to be provided to justify why effects would be considered not significant.</p> <p>The Proposed Development is not providing any additional parking spaces and therefore there will not be any higher magnitude of private vehicles on the surrounding roads because of the Proposed Development. Effects would be expected if there were a large proportion of the site designated as commercial use however, the small allocation of commercial space would not be considered to result in significant effects from the servicing vehicles associated with this space.</p> <p>Socio-Economics:</p> <p>The commercial floorspace on-site is limited. Given the small proportion of commercial space, it the professional opinion that significant effects from the end of use employment associated with this space is not likely and therefore, a detailed assessment to identify the non-significant effects is not considered appropriate.</p> <p>Justification has been provided within the socio-economic topic sheet as to why the assessment on to dentist, nurseries, leisure and other community facilities has not been included in the socio-economic assessment of the ES. This is due to not being able to conduct a quantitative assessment of the impact to these places because of the Proposed Development and also attendance at these facilities being less linked with location and need (i.e. primary and secondary schools and GP surgeries typically have catchment areas, whereas these facilities are typically private in nature and demand based), and more to personal choice. Effects to these places are as a result of the Proposed Development are not considered to be significant.</p> <p>Measures to reduce and prevent crime have been incorporated into the design of the Proposed Development. These measures will be detailed within the Design and Access Statement, a standalone planning document to be submitted alongside the planning application.</p> <p>Public Health:</p> <p>A Health Impact Assessment (HIA) will be completed and will accompanies the planning application. The HIA has been undertaken in line with Camden Local Plan Policy C1 ‘Health and Wellbeing’.</p> <p>Heritage, Townscape and Visual Impact:</p> <p>A separate Heritage, Townscape and Visual Impact Assessment will be undertaken and form a separate volume to the ES, refer to ES Volume 2, Heritage, Townscape and Visual Impact Assessment.</p> <p>Daylight, Sunlight and Overshadowing:</p> <p>Full assessment of the effects associated with these receptors is contained within ES Volume 1, Chapter 10: Daylight, Sunlight, Overshadowing and Solar Glare. Daylight, Sunlight and Overshadowing effects to new receptors within the red line boundary is a design consideration and as such</p>

Comment Provided by:	EIA Scoping Opinion	EIA Response
	<p>13. Traffic and Transport Traffic and Transport must be scoped in. The increase in deliveries/van traffic will not be insignificant as claimed and ignores the substantial change to traffic patterns adjacent to the site as a direct consequence of the partial pedestrianisation of Queen’s Crescent and changes to Holmes Road. TFL has noted the scheme may have significant impacts on surrounding public transport networks and will want to see; a Healthy Streets Transport Assessment, an Active Travel Zone assessment and the proposals support the strategic aim of the Mayor’s Transport Strategy.</p> <p>14. Waste and materials Waste and materials must be scoped in. Total demolition and rebuilding results in the most detrimental effects relating to materials, waste and carbon emissions. Refurbishment as a primary mitigation measure was not adequately argued or assessed by LBC or presented to residents as a valid choice. No consideration has been given to the impact on surrounding streets for site traffic during construction or waste collection in operation.</p> <p>15. Ecology and Biodiversity The existing mature landscape, trees and greenspace in and around the WKTE all contribute significantly to the setting, and its connection and relationship to the neighbourhood. The proposed privatisation of these spaces and the destruction of around 80 mature trees, which have a value (biodiversity, carbon capture, cooling, air purifying), that far exceed newly planted trees, is completely unacceptable. This contravenes LBC’s declaration of a Climate and Ecological emergency and Natural England guidance, “Green infrastructure is a natural capital asset that provides multiple benefits, at a range of scales. For communities, these benefits can include enhanced wellbeing, outdoor recreation and access, enhanced biodiversity and landscapes, food and energy production, urban cooling, and the management of flood risk. These benefits are also known as ecosystem services.”</p> <p>16. Geo-Environmental This must be scoped in. Hearsay notes there are tributaries of the Fleet across the site, not all of which are culverted. The Acting Contaminated Land Officer has commented; “Historical industrial land uses have been identified on site and immediately adjacent to the site... There is also the potential for elevated concentrations of heavy metals (primarily lead) within the background concentrations of Camden soils. Previous development has historically occurred on site, and hence there is the potential for made ground and associated contaminants of concern beneath the site.” A Land Contamination Risk Assessment has therefore been requested.</p>	<p>not an EIA matter. However, the planning application will be accompanied by a standalone Internal Daylight and Sunlight report which will assess this design consideration in further detail.</p> <p>Given the predicted materiality of the scheme and that the residential facades are expected to be curtailed during night-time (when internal lighting would be in operation) reducing levels of light pollution and as such it is not considered that significant effects arising from the light within the residential units would occur. Any externally lit areas would be committed to implementing best practice light guidance.</p> <p>Water Resources, Drainage and Flood Risk: The Proposed Development includes various measures to reduce water consumption such as: rainwater harvesting, efficient water fittings and blue roofs. The Proposed Development will also comply with sustainability targets such as achieve mains water consumption at 105 litres per person/day for domestic/non-domestic consumption.</p> <p>The site is located within a Flood Zone 1 meaning it is deemed to be at low risk from tidal and fluvial flooding. The site does not have any main rivers running through or in proximity to the site. The site is also not considered to lie within an area at risk of elevated groundwater. It is also considered to lie within an area at Very Low Risk of surface water flooding.</p> <p>The Proposed Development will incorporate Sustainable Drainage Systems, where possible. Finished floor levels will also be set at least 150mm above existing ground levels, where possible across the Proposed Development.</p> <p>Furthermore, given the site is over 1 hectare, a Flood Risk Assessment is required to accompany the planning application. The Flood Risk Assessment will identify and appraise the risk of flooding, look to quantify the potential risk posed elsewhere as a result of the Proposed Development and provide suitable mitigation measures.</p> <p>A Sustainable Drainage Systems Report will also be submitted as part of the Planning Application. This report will provide a suitable surface water drainage strategy that complies with relevant nation legislation and local guidance and review existing surface water drainage arrangements across the site.</p> <p>A separate Foul Drainage Assessment will also accompany the planning application and include detailed of portable water to the Proposed Development and how this will be managed.</p> <p>Basements will be designed in a way that there are no significant effects to or from groundwater.</p> <p>As a result, significant effects are not considered likely and therefore, this topic has not been included as a standalone chapter of the Environmental Statement.</p> <p>Traffic and Transport: A traffic and transport technical assessment will be included as a technical chapter of this ES. This chapter will assess the impacts from the demolition and construction stages of the Proposed Development and the operational effects on existing public transport services.</p> <p>Given no new car parking provision will be provided across the site, any effects associated with operational traffic are not considered to be significant in EIA terms and so therefore not assessed.</p> <p>Waste and Materials: It is not considered that significant effects would arise from waste and materials associated with the demolition and construction works and completed Proposed Development. Accompanying reports such as a Circular Economy Statement, Whole Life Carbon Statement, Sustainability Statement and a Transport Assessment which will consider waste management strategies have been submitted with the planning application. Furthermore, ES, Chapter 5: Demolition and Construction will set out various best practice measures for the demolition and construction process of the Proposed Development. The appointed Principal Contractor would be expected to produce a Construction Logistics Plan to assess the number of construction vehicles associated with the selected routes and gates following detailed review of the programme and construction requirements. As part of the planning application, a Framework Travel Plan will be undertaken and submitted alongside the planning application.</p> <p>As above, within Traffic and Transport, a Delivery and Servicing Management Plan is being provided to accompany the planning application which with include a detailed analysis of delivery and servicing vehicles and the wider transport impacts associated with the Proposed Development.</p> <p>Ecology and Biodiversity: An Arboricultural Impact Assessment and a tree survey have been prepared and are submitted as standalone reports to accompany the planning application.</p> <p>Geo-Environmental: Although it has been noted that there have been historical land uses present in the past across the site, it is considered that any contaminants associated by these uses would have been previously remediated or unlikely to remain significant due to the redevelopment across the site that has occurred over time. Furthermore, it is not considered that there is shallow groundwater across the site which could act as a migration pathway for any contaminants which could remain at the site.</p> <p>Standard mitigation measures will be adopted as part of the demolition and construction works across the site, which will be further defined once a Principal Contractor has been appointed. Standard mitigation measures are expected to be conditioned by the London Borough of Camden, should the development be granted.</p> <p>As per paragraph 15 on page 3 of Geoenvironmental (Ground Conditions, Groundwater and Soils) Topic Sheet, the River Fleet which has been noted to have historically run close to or under the site, has now been culverted and forms part of the River Fleet sewer located to the east of the site.</p>

Comment Provided by:	EIA Scoping Opinion	EIA Response
Tree and Landscape Officer	<p>It good that they are intending to retain high quality trees however the details submitted so far are not really sufficient to comment on in terms of the acceptability of removals and to a greater extent to what degree the trees to be retained will be impacted on by the proposed layout. Please can you request a full tree survey in line with BS5837:2012 Trees in relation to design, demolition and construction arboricultural impact assessment with a plan indicating trees to be removed and the root protection areas of trees to be retained showing their relationship to the proposed scheme?</p> <p>Ultimately we will need an arboricultural method statement and tree protection plan.</p>	<p>An Arboricultural Impact Assessment and a Tree Survey have been prepared and are submitted as standalone reports to accompany the planning application.</p>