Ballymore (Camley Street) Limited & London Borough of Camden

120-136 Camley Street & 3-30 Cedar Way

EIA Scoping Report

January 2025

120-136 CAMLEY STREET & 3-30 CEDAR WAY EIA SCOPING REPORT

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Glossary of Terms

Term	Definition
Above Ordnance Datum (AOD)	Ordnance Datum is the vertical datum used by Ordnance Survey as the basis for deriving altitudes on maps. Topography may be described using the level in comparison or 'above' ordnance datum.
ADF	Average Daylight Factor
ADMS Dispersion model	Atmospheric Dispersion Modelling System used in the modelling of air quality data
Air pollutants	Amounts of foreign and/or natural substances occurring in the atmosphere that may result in adverse effects on humans, animals, vegetation and/or materials.
Air Quality Management Area (AQMA)	A defined area by virtue of Section 82(3) of the Environment Act 1995, where it appears that the air quality objectives prescribed under the UK Air Quality Strategy will not be achieved. In these areas, a Local Authority must designate Air Quality Management Areas, within which an Action Plan can be proposed to secure improvements in air quality so that prescribed air quality objectives can be achieved.
Air Quality Objectives (AQO)	Criteria for the assessment of local air quality expressed in terms of a concentration threshold to be achieved by a certain date. The thresholds are established at concentrations considered acceptable in the light of what is known about the effects of each pollutant on health or ecosystems.
Air quality sensitive receptors	People, property or designated sites for nature conservation that may be at risk from exposure to air pollutants that could potentially arise as a result of the Proposed Development.
Annual mean concentration	The average (mean) of the hourly pollutant concentrations measured or predicted for a one year period.
Application Site	The site for which the planning application is submitted.
APSH	Annual Probable Sunlight Hours
Baseline	Environmental conditions at specific periods of time, present on, or near a site, against which future changes may be measured or predicted.
BGS	British Geological Society
BRE	Building Research Establishment
CIL	Community Infrastructure Levy
CIP	Community Investment Programme
CoCP	Code of Construction Practice
COMAH	Control of Major Accident Hazards
Concentration (air quality)	The amount of a (polluting) substance in a volume (of air), typically expressed as a mass of pollutant per unit volume of air (for example, micrograms per cubic metre, $\mu g/m^3$) or a volume of gaseous pollutant per unit volume of air (parts per million, ppm).

Term	Definition
Committed development	Planning application of development schemes which have been approved by the relevant local authority.
Conservation Area	An area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. Designation by the local authority often includes controls over the demolition of buildings; strengthened controls over minor development; and special provision for the protection of trees.
Construction	All construction works associated with the Proposed Development.
CRMP	Construction Resource Management Plan
Cumulative effects	The summation of effects that result from changes caused by a development in conjunction with other reasonably foreseeable committed developments that is either consented but not yet constructed or is in the process of seeking permission.
DEFRA	Department for Environment, Food and Rural Affairs
Designated Heritage Asset	A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated as such under the relevant legislation.
Desk Based Assessment (DBA)	Research based primarily on database and internet data gathering methods.
Direct effect	An effect that is directly attributable to the Proposed Development.
Dust	Fine particles of solid materials in the size faction 1µm - 75µm in diameter, as defined in BS 6069:1994 capable of being re-suspended in air and settling only slowly under the influence of gravity where it may cause nuisance.
EIA Regulations	The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
Emission	A material that is expelled or released to the environment. Usually applied to gaseous or odorous discharges to the atmosphere.
Enhancement	Landscape improvement through restoration, reconstruction or creation.
Environment Agency (EA)	The Environment Agency is an executive non-departmental public body, sponsored by the Department for Environment, Food and Rural Affairs which was established in 1996 to protect and improve the environment.
Environmental effect	The consequence of an impact on the environment.
Environmental impact	A physical or measurable change to the environment attributable to the Proposed Development.
Environmental Impact Assessment (EIA)	A systematic means of assessing a development project's likely significant environmental effects undertaken in accordance with EIA Regulations.
EIA Development	A development constitutes 'EIA Development' when it is determined that the Proposed Development requires EIA, or an ES is submitted to accompany the application.

Term	Definition
Environmental Statement (ES)	A statement that includes the information that is reasonably required to assess the environmental effects of the development and which the applicant can, having regard to current knowledge and methods of assessment, reasonably be required to compile, but that includes at least the information referred to in the EIA Regulations.
EPUK	Environmental Protection UK
Exceedance	A period of time where the concentrations of a pollutant is greater than, or equal to, the appropriate Air Quality Objective.
Flood Zone	There are four classifications for flood zones as defined in the National Planning Policy Framework (NPPF): • Zone 1: Low probability (less than 1 in 1000 annual probability of river or sea flooding in any year); • Zone 2: Medium probability (between 1 in 100 and 1 in 1000 annual probability of river flooding or between 1 in 200 and 1 in 1000 annual probability of sea flooding in any year); • Zone 3a: High probability (1 in 100 or greater annual probability of river flooding in any year or 1 in 200 or greater annual probability of sea flooding in any given year); and • Zone 3b: High probability (functional flood plain. Essentially the 1 in 20 or greater annual probability of flooding in any given year).
GEA	Gross External Area
GAAS	Greater London Archaeological Advisory Service
Hectare (ha)	A unit of area (10,000 m^2/2.471 acres).
Heritage	Historical or cultural associations.
Heritage Asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage and assets identified by the local planning authority (including local listing).
Historic England (HE)	A public body which looks after England's historic environments
Historic Environment	All aspects of the environment resulting from the interaction between people and places through time including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. Those elements of the historic environment that hold significance are called heritage assets.
HSE	Health and Safety Executive
IAQM	Institute for Air Quality Management
IEMA	Institute of Environmental Management and Assessment
Impact	A physical or measurable change to the environment attributable to the Proposed Development.

Term	Definition
Indirect effects	Effects that result indirectly from the proposed project as a consequence of the direct effects, often occurring away from the site, or as a result of a sequence of interrelationships or a complex pathway. They may be separated by distance or time from the source of the effects.
JV	Joint Venture
Kilometre (km)	Measurement of distance (1000 metres)
Land Use	The primary use of land, including both rural and urban activities.
L10	The noise level just exceeded for 10% of the measurement period
L90	The noise level exceeded for 90% of the measurement period
Leq	'Equivalent Continuous Sound Level': The sound level in decibels equivalent to the total sound energy measured over a stated period of time
LBC	London Borough of Camden, the determining authority and competent authority in respect of the EIA Regulations.
Listed Building	A building entered on a list of buildings of special architectural or historic interest compiled by the Secretary of State for the guidance of local planning authorities in the exercise of their planning functions under the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Town and Country Planning Act 1990. Buildings are graded as follows: • Grade I – Buildings of exceptional interest; • Grade II* - Particularly important buildings of more than special interest; and • Grade II – Buildings of special interest.
Lmax	'Maximum Sound Level' - Maximum Sound Level during a measurement period or a noise event
Local Nature Reserve (LNR)	A statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949, and amended by Schedule 11 of the natural Environment and Rural Communities Act 2006, by principal local authorities.
Local Plan	A detailed district or borough-wide land-use plan, prepared and adopted by a district planning authority, which is part of the statutory development plan. Consists of a written statement which sets out the district planning authority's development control policies and proposals for land use and transport over a period of about 10 years and an Ordnance Survey-based proposals map.
London Plan	The strategic plan for London, setting out an economic, environmental, transport and social framework for development.
Magnitude	A combination of the scale, extent and duration of an effect.
Methodology	The scientific approach and techniques used for the study
Mitigation Measures	Actions proposed to avoid, prevent, reduce and where possible offset significant adverse environmental effects arising from the whole or specific elements of a development.
MUGA	Multi-use Games Area

Term	Definition
NE	Natural England
NGR	National Grid Reference
NHS	National Health Service
Nitrogen Oxides (NOx)	Nitric oxide (NO) is mainly derived from road transport emissions and other combustion processes such as the electricity supply industry. NO is not considered to be harmful to health. However, once released to the atmosphere, NO is usually very rapidly oxidised to nitrogen dioxide (NO2), which is harmful to health. NO2 and NO are both oxides of nitrogen and together are referred to as nitrogen oxides.
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
NSL	No Skyline Contour
Operational	When the Proposed Development is constructed on the Application Site and is in or ready for use
OS	Ordnance Survey
Particulate Matter	Fine particles are composed of a wide range of materials arising from a variety of sources including combustion sources (mainly road traffic), and coarse particles, suspended soils and dust from construction work. Particles are measured in a number of different size fractions according to their mean aero-dynamic diameter. Most monitoring is currently focussed on PM10 (less than 10 microns in aero-dynamic diameter), but the finer fractions such as PM2.5 (less than 2.5 microns in aero-dynamic diameter) is becoming of increasing interest in terms of health effects.
PEA	Preliminary Ecological Appraisal
Phase 1 Habitat Survey	An ecological survey technique that provides a standardised system to record vegetation and wildlife habitats. It enables a basic assessment of habitat type and its potential importance for nature conservation.
PPG	Planning Policy Guidance
PM_{10}	Particulate matter with a mean aerodynamic diameter of less than 10□m.
Post-medieval	AD 1500 – present.
Pre-Historic	The period of human history preceding written records.
PTAL	Public Transport Accessibility Level
Receptor	A component of the natural, created or built environment such as humans, water, air, a building, or a plant that has the potential to be affected by the Proposed Development.
Registered Historic Parks and Gardens	Parks and Gardens of special historic interest in England. Registered parks and gardens are designated heritage assets and subject to the planning policies within the NPPF.
Residual	When used to describe archaeological artefacts, this means not in-situ, i.e. Found outside the context in which it was originally deposited.

Term	Definition
Residual Effects	Those effects of a development that cannot be mitigated following implementation of mitigation proposals.
Scheduled Monument	An ancient monument or archaeological deposits designated by the Secretary of State as a 'Scheduled Ancient Monument' and protected under the Ancient Monuments Act.
Scoping	An exercise undertaken to determine the topics to be addressed within the Environmental Statement.
Sensitivity	A term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and the value related to that receptor.
Setting of a heritage asset	The surroundings in which (the asset) is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
SFRA (or FRA)	Strategic Flood Risk Assessment
Significance (effect)	A measure of the importance or gravity of the environmental effect defined by significance criteria specific to the environmental topic.
Site of Special Scientific Interest (SSSI)	A site statutorily designated under the Wildlife and Countryside Act 1981 (as amended) as being of special nature conservation or geological interest. SSSIs include wildlife habitats, geological features and landforms.
Special Area of Conservation (SAC)	A site designated under the EU's Habitats Directive which is transposed into UK law by the Conservation of Habitats and Species Regulations 2017.
Special Protection Area (SPA)	A designation under the European Union Directive on the Conservation of Wild Birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain particularly threatened birds.
SPG	Supplementary Planning Guidance
Study area	Defined area surrounding the proposed development in which archaeological data is collected and analysed in order to set the site into its archaeological and historical context.
Susceptibility	The ability of a defined landscape or visual receptor to accommodate the specific proposed development without undue negative consequences.
Sustainable Drainage System (SuDS)	Sustainable management practices designed to control the rate and quality of surface water runoff into receiving waters, for example the use of swales and wetlands as buffers, as opposed to conventional drainage practices.
Temporary or permanent effects	Environmental effects may be considered as temporary (limited duration and reversible) or permanent (irreversible). Some development may also be reversible.
Transport Assessment (TA)	A quantitative assessment of transport effects of construction and completed development phases of the proposed development.
Travel Plan (TP)	A travel plan is a package of measures produced by employers to encourage staff to use alternatives to single-occupancy car use.

Term	Definition
Type or Nature of Effect	Whether an effect is direct or indirect, temporary or permanent, positive (beneficial), neutral or negative (adverse) or cumulative.
UKPN	United Kingdom Power Network
Visual receptors	Individuals and/or defined groups of people who have the potential to be affected by a proposal.
Visualisation	A computer simulation, photomontage or other technique to illustrate the appearance of a proposed development.
VSC	Vertical Sky Component
Worst-case situation/scenario	Principle applied where the environmental effects may vary, for example, seasonably to ensure that the most sever potential effect is assessed.
WRAP	Waste and Resources Action Programme
$\mu g/m^3$	Micrograms per cubic metre of air: A measure of concentration in terms of mass per unit volume. A concentration of 1 $\mu g/m^3$ means that one cubic metre of air contains one microgram (millionth of a gram) of pollutant).

1. Introduction

1.1 Background

1.1.1 The London Borough of Camden (LBC) (via their Community Investment Programme) and Ballymore (Camley Street) Limited (a Joint Venture between Ballymore and Lateral) (hereafter, together referred to as the 'Applicant') intends to submit two detailed planning applications for the development of two sites ('Site A' (120 -136 Camley Street)) and 'Site B' (3-30 Cedar Way)), though, together referred to as the 'Sites'), to provide a mixed-use development (the 'Proposed Development'). It should be noted that whilst the LBC and Ballymore (Camley Street) Limited are together referred to as the 'Applicant', only LBC will be submitting a planning application for Site A. Both LBC and Ballymore (Camley Street) Limited will be submitting a planning application for Site B. Nevertheless, both LBC and Ballymore (Camley Street) Limited are together referred to as the 'Applicant' for the purposes of this Environmental Impact Assessment (EIA) Scoping Report.

1.1.2 Additionally, whilst two planning applications will be submitted and Site A and Site B will be implemented independently, the Proposed Development is being designed in such a way to ensure a comprehensive approach across the Sites, which will be intrinsically linked and will address some key policy provisions jointly, including land use and residential tenure. Therefore, it is proposed to assess them as such (i.e. one Proposed Development) within the EIA, with different scenarios to demonstrate the potential effects of Site A coming forward without Site B, and vice versa.

1.1.3 The determining authority for the planning application is the LBC and the Sites are located to the east of Camley Street, with Site A centred on Ordnance Survey (OS) National Grid Reference (NGR) TQ 29685 84208 and Site B centred on OS NGR TQ 29727 84003.

1.1.4 Site A (comprising of 0.48 hectares (ha) of land) is bound by:

- Agar Grove to the north;
- Railway lines to the east;
- Railway arches to the south; and
- The Agar Grove Estate and Wrotham Road to the west.

1.1.5 Site B (comprising of 0.96 ha of land) is bound by:

- 1-2 Cedar Way and a High Speed 1 / Department for Transport site to the north;
- Railway lines to the east;
- Commercial floorspace to the south; and

- Camley Street to the west.

1.1.6 The Sites' boundaries are shown in **Figure 1.1.1**.

1.1.7 The Proposed Development will comprise the construction of a commercial-led, mixed-use development, providing approximately 36,000 square metres (m^2) Gross External Area (GEA) of commercial floorspace (Use Class E) and up to 410 residential homes (Use Class C3), within buildings ranging from ground plus 10 storeys to ground plus 14 storeys in height (a maximum of 83 metres above ordnance datum (m AOD)) on Site A and buildings ranging from ground plus 10 storeys to ground plus 30 storeys in height (a maximum of 136 m AOD) on Site B. The Proposed Development will also provide public realm and associated landscaping.

1.1.8 The Proposed Development falls within the classification of Schedule 2, 10 (b) (Infrastructure Projects – Urban Development Projects) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations')[1]. Given the scale of the Proposed Development exceeds the thresholds set out in Schedule 2 of the EIA Regulations: 10b Urban Development Projects (i.e. the Proposed Development will provide more than 150 dwellings and more than 10,000 m^2 of non-residential floorspace), it is anticipated that there is the potential for significant environmental effects to arise. Therefore, the Applicant has volunteered to produce an Environmental Statement ('ES') which will accompany the planning application and communicate the findings of the EIA.

1.1.9 Temple Group Ltd ('Temple') has been commissioned by the Applicant to prepare an EIA Scoping Report in line with the requirements of Regulation 15 of the EIA Regulations, to support a request for an EIA Scoping Opinion.

1.2 Purpose of the Scoping Report

1.2.1 Scoping is the process of determining the scope and level of detail of information to be provided in the ES and agreeing where a topic / aspect is unlikely to have significant effects and, therefore, can be excluded. This forms an early stage in the EIA process, enabling the activity of reviewing any environmental studies undertaken to date and identifying those environmental aspects that may be significantly affected / impacted by a Proposed Development.

1.2.2 This Scoping Report describes the scope of the technical studies to be undertaken in order to provide a comprehensive assessment of significant effects likely to arise, and to determine suitable mitigation measures for the construction and operational

[1] The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/571).

phases of the Proposed Development. The Scoping Report outlines the proposed scope of the Camley Street EIA, providing a mechanism for consulting on and agreeing the content and methodology of the subsequent EIA with LBC officers, statutory consultees, and other stakeholders.

Figure 1.1.1: Sites' Boundaries

1.3 Structure of the Scoping Report

1.3.1 This Scoping Report is structured as follows:

- Section 1 introduces the requirement for EIA and scoping process;
- Section 2 describes the Site context and key receptors;
- Section 3 describes the policy context;
- Section 4 describes the Proposed Development;
- Section 5 summarises the consultation strategy;
- Section 6 outlines the overall assessment methodology and approach to the EIA;
- Section 7 presents the key environmental topics to be addressed by the EIA;
- Section 8 summarises the issues intended to be scoped out of the EIA;
- Section 9 provides the proposed structure of the ES; and
- Section 10 provides an overall summary and conclusions to the report.

1.4 The Environmental Statement

1.4.1 The EIA Regulations require that an EIA be undertaken for the Proposed Development, and that an ES identifying effects and associated mitigation measures must be provided for EIA developments to accompany the planning application.

1.4.2 For the purposes of the EIA Regulations, Regulation 18 (3) defines an ES as:

"...a statement which includes at least:

a) a description of the proposed development comprising information on the site, design, size and other relevant features of the development;

b) a description of the likely significant effects of the proposed development on the environment;

c) a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;

d) a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;

e) non-technical summary of the information referred to in sub-paragraphs (a) to (d); and

f) any additional information specified in Schedule 4 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.

1.4.3 Temple has been commissioned by the Applicant to prepare the EIA in accordance with the EIA Regulations and other relevant EIA guidance, and to produce the ES which will be submitted with the planning application.

1.4.4 The Applicant will provide the necessary information to enable the EIA to be undertaken. The ES will ensure that sufficient information is provided to enable LBC to make a decision about the planning application with due regard to and in the knowledge of any likely significant environmental effects.

1.4.5 Once submitted, the competent authority responsible for authorising the relevant development (in this instance, LBC) should publicise the availability of the ES (and any related additional information) to potentially interested parties, such as statutory and non-statutory consultees and the public, so as to enable their opinions on the Proposed Development and ES to be represented to the planning process.

1.5 The EIA Project Team

1.5.1 The EIA Regulations 2017, state in Regulation 18(5) *"In order to ensure the completeness and quality of the environmental statement-*

a) the developer must ensure that the environmental statement is prepared by competent experts; and

b) the environmental statement must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts".

1.5.2 In accordance with Regulation 18(5) (a & b), it is confirmed that this Scoping Report has been prepared, and the EIA will be undertaken and prepared, by competent experts from the below organisations. Their relevant expertise and qualifications will be stated within the ES.

1.5.3 Temple is one of the UK's leading independent infrastructure and property consultancies, specialising in environment, planning and sustainability. Temple is a founding member of the Institute of Environmental Management and Assessment (IEMA) EIA Quality Mark and recognised provider of EIA services on some of the UK's most high-profile development schemes. Temple also has a strong track record providing expertise and formal review services on behalf of Local Authorities of EIAs submitted by other third parties. Temple will be responsible for the coordination and management of the EIA and the preparation of the ES.

1.5.4 The EIA project team is comprised of the organisations identified in **Table 1.5.1.**

Table 1.5.1: The Proposed Project Team

Project Role	Organisation
The Applicant	Ballymore (Camley Street) Limited & London Borough of Camden
Site-Wide Masterplan Architect	Feilden Clegg Bradley Studios
Architect - Site A	Feilden Clegg Bradley Studios
Architect - Site B	Morris and Company
Landscape Architect	Spacehub
Town Planning Consultant	Turley
EIA Coordination, Air Quality, Socio-Economics, Noise and Vibration, Climate Change and Health Consultant	Temple
Transport Consultant	Velocity
Wind Microclimate Consultant	RWDI
Daylight, Sunlight and Overshadowing Consultant	DPR
Heritage, Townscape and Visual Impact Assessment Consultant	Montagu Evans
Energy and Sustainability Consultant	Hoare Lea

2. Description of Context and Key Receptors

2.1 Site Description

2.1.1 Site A currently comprises 120-136 Camley Street (which are one storey, industrial warehouse buildings, providing auto-trading services), hardstanding, Camley Street itself, two small car parking areas, and a cycle path. Site A is bounded by:

- Agar Grove to the north;
- Railway lines to the east;
- Railway arches to the south; and
- The Agar Grove Estate and Wrotham Road to the west.

2.1.2 Vehicular access to Site A is available from Camley Street.

2.1.3 Site B currently comprises 3-30 Cedar Way (which are 1-2 storey, industrial warehouse buildings), and hardstanding. Site B is bounded by:

- 1-2 Cedar Way and a High Speed 1 / Department for Transport site to the north;
- Railway lines to the east;
- Commercial floorspace to the south; and
- Camley Street to the west.

2.1.4 Vehicular access to the Site B is available from Cedar Way, off of Camley Street.

2.2 Site Context

2.2.1 The Sites are located to the east of Camley Street, with Site A being located in the Camden Square ward and Site B being situated in the Kings Cross ward. The location of the Sites in their wider geographical context is presented in **Figure 2.2.1**.

2.2.2 According to Transport for London (TfL)'s WebCAT[2], Site A has a Public Transport Access Level (PTAL) of predominantly PTAL 3 across Site A and PTAL 1b-2 across Site B. Whilst the PTAL for the Sites is fairly low, in reality, the PTAL is very good, as outlined in the paragraphs below. PTAL is a measure which rates locations by distance from frequent public transport services. The best possible rating is 6b. Low PTAL ratings normally suggest poor connectivity to the public transport network.

[2] Transport for London (2017) Web Connectivity Assessment Toolkit (WebCAT). Available from: https://tfl.gov.uk/info-for/urbanplanning-and-construction/planning-with-webcat/webcat

2.2.3 St Pancras International Station is located approximately 700 m to the south of the Sites. This station is serviced by the Eurostar, EMR, Southeastern and Thameslink. The Eurostar provides services to Europe and EMR, Southeastern and Thameslink provide services to north and south-east of the country.

2.2.4 There are approximately 4 bus stops within a 250 m radius of Site A, providing services to route 274, serving locations such as Lancaster Gate, Baker Street, Islington and others. There are no bus stops within a 250 m radius of Site B.

2.2.5 Both Sites are located within the Camden Air Quality Management Area (AQMA), which has been designated for exceedances in nitrogen dioxide (NO_2) and particulate matter (PM_{10}).

2.2.6 There are numerous listed buildings and structures within a 1 km radius of the Sites; however, there are only four listed buildings and structures within an approximate 300 m radius of the Sites. These include: the Grade II listed 111-121 St Pancras Way (located approximately 265 m to the west of Site A); Grade II listed K2 Telephone Kiosk at Junction with Agar Grove (located approximately 25 m to the north of Site A); Grade II listed 22 Murray Mews (located approximately 145m to the north of Site A); and Grade II listed Penfold Pillar Box outside Parcel Force Central Office (office not included), St Pancras Way (located approximately 195 m to the south-west of Site B). **Figure 2.2.1** illustrates the location of listed buildings and structures in relation to the Sites.

2.2.7 The Sites are not located in Conservation Areas, though the Camden Square Conservation Area is located approximately 50 m to the north-east of Site A and approximately 230 m to the north-east of Site B. The Regents Canal Conservation Area is situated approximately 260 m to the south-west of Site A and approximately 140 m to the south-west of Site B.

2.2.8 There are no Scheduled Monuments or Registered Battlefields within 1 km of the Sites, though there is a Registered Park and Garden (Grade II St. Pancras Garden) situated approximately 360 m to the south of the Sites.

2.2.9 Site A lies within a London View Management Framework (LVMF, 2012) viewing corridor: Kenwood viewing gazebo to St Paul's Cathedral. Site B does not lie within any LVMF viewing corridors.

2.2.10 The Sites are not located in an Archaeological Priority Area (APA). The closest APAs are the St Pancras APA, which is situated approximately 585 m to the south of Site A and approximately 370 m to the south of Site B. The Kentish Town APA is located approximately 450 m to the north-west of Site A and approximately 575 m to the north-west of Site B. The Canalside Industry APA is situated approximately 595 m to the west of Site A and approximately 610 m to the north-west of Site B.

2.2.11 With the exception of the Camley Street Nature Park Local Nature Reserve (LNR) is located approximately 450 m to the south of the Sites, there are no other LNRs within 1 km of the Sites (as shown in **Figure 2.2.1**). There are no Sites of Special Scientific Interest (SSSIs), Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites within 1 km of the Sites.

2.2.12 The North London Line at York Way Site of Importance for Nature Conservation (SINC) is located to the south-east of Site A (by approximately 50 m) and the north-east of Site B (by approximately 30 m). The London's Canals SINC is situated approximately 260 m to the south-west of Site A and approximately 140 m to the south-west of Site B.

2.2.13 There are local open spaces within 1 km of the Site, including the following:

- Elm Village Open Space, located approximately 145 m the south-west of Site A and approximately 130 m to the west of Site B;
- Camden Square Gardens, located approximately 140 m to the north of Site A and approximately 400 m to the north of Site B;
- St. Pancras Gardens, situated approximately 580 m to the south of Site A and 375 m to the south of Site B; and
- Cantelowes Gardens, located approximately 370 m to the north of Site A and 630 m to the north of Site B.

2.2.14 There are no National Parks or Areas of Outstanding Natural Beauty within 1 km of the Site.

2.2.15 Both Sites are located in Flood Zone 1 (areas with a low probability of flooding). There are no watercourses on the Sites; the closest watercourse is the River Thames, which is located approximately 3.4 km to the south-east of the Sites, at the closest point. Both Sites are at a negligible to low risk of flooding from surface water, sewers and artificial drainage bodies, though it should be noted that there is a small area in the south-west of Site A which has a low to high risk of surface water flooding.

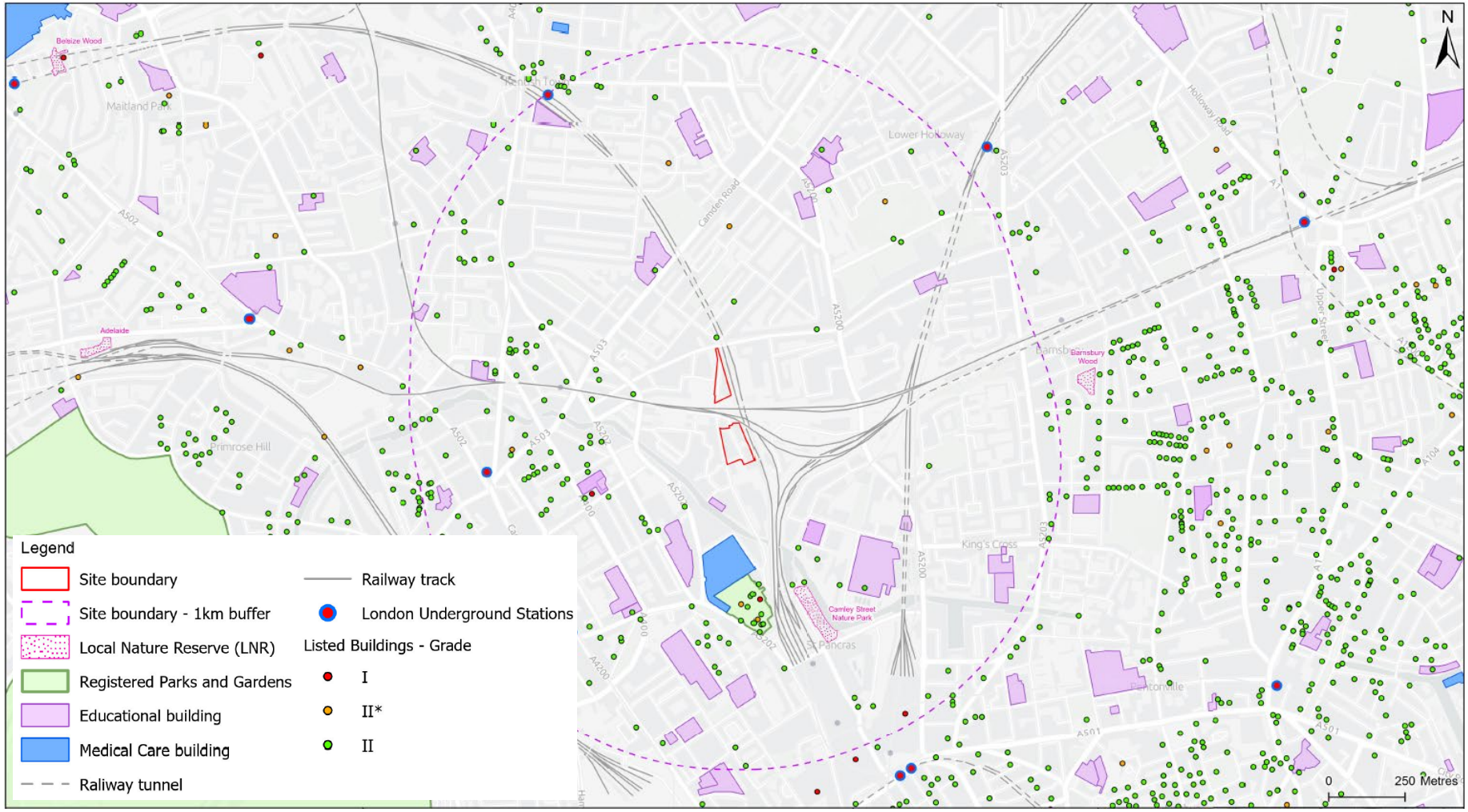
2.2.16 The key receptors which are considered potentially sensitive to the demolition and construction and operation of the Proposed Development have been identified and are summarised in **Table 2.2.1**.

Table 2.2.1: Potential Key Receptors

Category	Potential Sensitive Receptor / Land Use
Residential	Current residents within surrounding buildings including those along Camley Street, Agar Grove, Wrotham Road, St. Paul's Crescent, Bowmore Walk, Hazelbury Way, Barker Driver and Weavers Way. Future residents of the Proposed Development.
Commercial	Existing industrial / light industrial and other commercial uses on

Category	Potential Sensitive Receptor / Land Use
	both Sites and to the south of Site B.
Community	Users of current public open spaces, such as Camden Square Gardens, Cantelowes Gardens, St. Pancras Gardens and future public open spaces / realm. Users of current social infrastructure such as schools, GP surgeries and NHS dentists.
Transport Infrastructure	Drivers of surrounding trainline. Car drivers on surrounding road. Pedestrians and cyclists. Local highway network. Public transport network.
Global climate system	Global climate system.
Ecological	Camley Street Nature Park LNR. North London Line at York Way SINC. London's Canals SINC.
Heritage Assets	Grade II listed 111-121 St Pancras Way. Grade II listed K2 Telephone Kiosk at Junction with Agar Grove. Grade II listed 22 Murray Mews. Grade II listed Penfold Pillar Box outside Parcel Force Central Office (office not included), St Pancras Way. Grade II St. Pancras Garden. Camden Square Conservation Area. Regents Canal Conservation Area. Locally-listed buildings (non-designated heritage assets).
Townscape and Views	Townscape Character Areas. Users of views, particularly the LVMF viewing corridor: Kenwood viewing gazebo to St Paul's Cathedral.

Figure 2.2.1: Sites' Context



3. Policy Context

3.1 Planning Context

3.1.1 The EIA will consider legislation and relevant national and local planning policy guidance as summarised below.

3.2 National Planning Policy

3.2.1 The ES will have regard to the National Planning Policy Framework (NPPF)[3], which sets out the Government's economic, environmental and social planning policies for England. The policies contained within the NPPF articulate the Government's vision of sustainable development, which are intended to be interpreted at a local level, to meet the requirements of local aspirations.

3.2.2 The NPPF should be read alongside the national Planning Practice Guidance (PPG), which aims to make planning guidance more accessible, and to ensure that the guidance is kept up to date.

3.3 Regional Planning Policy

3.3.1 The ES will have regard to the following key regional strategic planning documents. Any additional regional planning policy and guidance documents considered relevant to the technical assessment which are covered by the EIA will also be considered:

- The 2021 London Plan[4]; and
- Supplementary Planning Guidance (SPG)[5] and London planning guidance, which details further guidance on policies in the London Plan that can't be addressed in sufficient detail in the plan itself, including (but not limited to) the following:
  - Accessible London: Achieving an Inclusive Environment SPG[6]
  - Air Quality Neutral London Plan Guidance (LPG)[7];

[3] Ministry of Housing, Communities and Local Government (MHCLG) (December 2024); National Planning Policy Framework.

[4] GLA (March 2021) The London Plan: The Spatial Development Strategy for Greater London.

[5] GLA: Supplementary Planning Guidance.

[6] GLA, (2014); Shaping Neighbourhoods, Accessible London: Achieving an Inclusive Environment SPG.

[7] GLA, (2023); Air Quality Neutral LPG.

- Air Quality Positive LPG[8];
- 'Be Seen' Energy Monitoring Guidance LPG[9];
- Circular Economy Statements LPG[10];
- Housing SPG[11];
- London View Management Framework SPG[12];
- Play and Informal Recreation SPG[13];
- Sustainable Transport, Walking and Cycling LPG[14];
- Urban Greening Factor LPG[15]; and
- Whole Life-Cycle Carbon Assessments[16].

3.4 Local Planning Policy

3.4.1 The ES will have regard to LBC's Local Plan[17], Draft New Local Plan[18], Canalside to Camley Street Supplementary Planning Document (SPD)[19], Camley Street Neighbourhood Plan[20] and the North London Waste Plan[21].

[8] GLA, (20233); Air Quality Positive LPG.

[9] GLA, (2021); 'Be Seen' Energy Monitoring Guidance LPG.

[10] GLA, (2022); Circular Economy Statements LPG.

[11] GLA, (2016); Housing SPG.

[12] GLA, (2012); London View Management Framework SPG.

[13] GLA, (2012); Play and Informal Recreation SPG.

[14] GLA, (2022); Sustainable Transport, Walking and Cycling LPG.

[15] GLA, (2023); Urban Greening Factor LPG.

[16] GLA, (2022); Whole Life-Cycle Carbon Assessments LPG.

[17] LBC, (2017); Camden Local Plan.

[18] LBC, (2024); Draft New Camden Local Plan – Regulation 18 Consultation Version.

[19] LBC, (2021); Canalside to Camley Street SPD.

[20] LBC, (2021); Camley Street Neighbourhood Development Plan (2019-2034).

[21] North London Authorities (Barney, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest), (2022); North London Waste Plan.

3.4.2 The ES will have regard to any relevant Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPGs), including (but not limited to) the following:

- Access for All Camden Planning Guidance (CPG)[22];
- Air Quality CPG[23];
- Amenity CPG[24];
- Biodiversity CPG[25];
- Design CPG[26];
- Employment Sites and Business Premises CPG[27];
- Energy Efficiency and Adaptation CPG[28];
- Housing CPG[29];
- Planning for Health and Wellbeing CPG[30];
- Public Open Space[31];
- Transport CPG[32];
- Trees CPG[33]; and
- Water and Flooding CPG[34].

[22] LBC, (2019); Access for All CPG.

[23] LBC, (2021); Air quality CPG.

[24] LBC, (2021); Amenity CPG.

[25] LBC, (2018); Biodiversity CPG.

[26] LBC, (2021); Design CPG.

[27] LBC, (2021) Employment Sites and Business Premises CPG.

[28] LBC, (2021); Energy Efficiency and Adaptation CPG.

[29] LBC, (2021); Housing CPG.

[30] LBC, (2021); Planning for Health and Wellbeing CPG.

[31] LBC, (2021); Public Open Space CPG.

[32] LBC, (2021); Transport CPG.

[33] LBC, (2019); Trees CPG.

[34] LBC, (2019); Water and Flooding CPG.

3.5 Other Policy and Guidance Considerations

3.5.1 There are a number of supporting policy and guidance documents that are relevant to each environmental discipline and will be considered on a topic-by-topic basis within the ES.

4. Scheme Description

4.1.1 The Proposed Development will comprise the demolition of existing buildings on the Sites and construction of a mixed-use development, to deliver approximately 36,000 m^2 GEA of commercial (Class E) floorspace and up to 410 residential homes (Class C3), within buildings ranging from ground plus 10 storeys to ground plus14 storeys (a maximum of 83 m AOD) in height on Site A and buildings ranging from ground plus 10 storeys to ground plus 30 storeys (a maximum of 136 m AOD) in height on Site B.

4.1.2 The Proposed Development will also provide associated landscaping and public realm works.

4.1.3 It should be noted that the description of the Proposed Development presented above are maximum parameters that have been used to determine the scope and methodology of assessments to be undertaken as part of the EIA. It is envisaged that these maximum parameters will be refined through design development and the detail fixed, prior to the assessments being undertaken and the submission of the planning applications.

4.1.4 Whilst the height of the Proposed Development on Site A will be a maximum of 14 storeys (83 m AOD), it should be noted that this part of the Proposed Development (specifically the plant and stair enclosure of one of the Site A buildings) will be located in the Wider Setting Consultation Zone of LVMF view 3A.1, but not within the Viewing Corridor. The plant and stair enclosure will be set back from the building line and the building roof line parapet of this part of the Proposed Development on Site A will sit below the Viewing Corridor of LVMF view 3A.1. Please refer to **Section 7.9** of this report for further details regarding the proposed Heritage, Townscape and Visual Impact Assessment (HTVIA) that will determine the potential effect of the Proposed Development on specific views, including LVMF view 3A.1.

4.2 Demolition and Construction

4.2.1 It is anticipated that the demolition (and enabling works) of the existing buildings on Site A will take approximately 4 months and the demolition (and enabling works) of the existing buildings on Site B will take approximately 6 months. The construction of the Proposed Development will then take place over a period of approximately 42 months (3.5 years).

4.2.2 At this stage limited detail is available on the proposed construction methodology; however, timescales and construction methods are likely to be comparable to those of any similar scale urban development. As such, the stages are likely to include any necessary grading, piling/pouring of foundations, construction of the building

structures, external fit-out, internal-fit out and landscaping. The ES will include a chapter describing the proposed construction methodology and timescales.

4.3 Operation

4.3.1 Once the Proposed Development is fully operational, it will be occupied by Site users and residents. This will be detailed further within the ES.

5. Consultation and Engagement

5.1.1 The process of consultation is important to the development of a comprehensive and balanced ES. Views of the interested and affected parties serve to focus the environmental studies and to identify specific issues that require further investigation. Consultation is an ongoing process as part of the design development.

5.1.2 Information and views are being sought from a range of statutory and non-statutory bodies through public consultation and the intention is for consultees to be involved in the evolution of the design and assessment of environmental effects.

5.1.3 Key consultees are considered to include, but are not limited to:

- The Greater London Authority (GLA);
- Local residents and community groups (to be agreed with the LBC);
- Important neighbouring occupiers and landowners, and the Neighbourhood Forum, where necessary.
- LBC, as the Local Planning Authority (including departments such as Highways, Environmental Health and Lead Local Flood Authority (LLFA));
- The London Borough of Islington (LBI);
- Environment Agency (EA);
- Historic England (HE);
- Natural England (NE);
- Greater London Archaeological Advisory Service (GLAAS);
- Network Rail;
- Department for Transport;
- Transport for London (TfL); and
- National Grid (NG) and other statutory utility providers (including Thames Water Utilities network (TWUL) and UK Power Networks (UKPN).

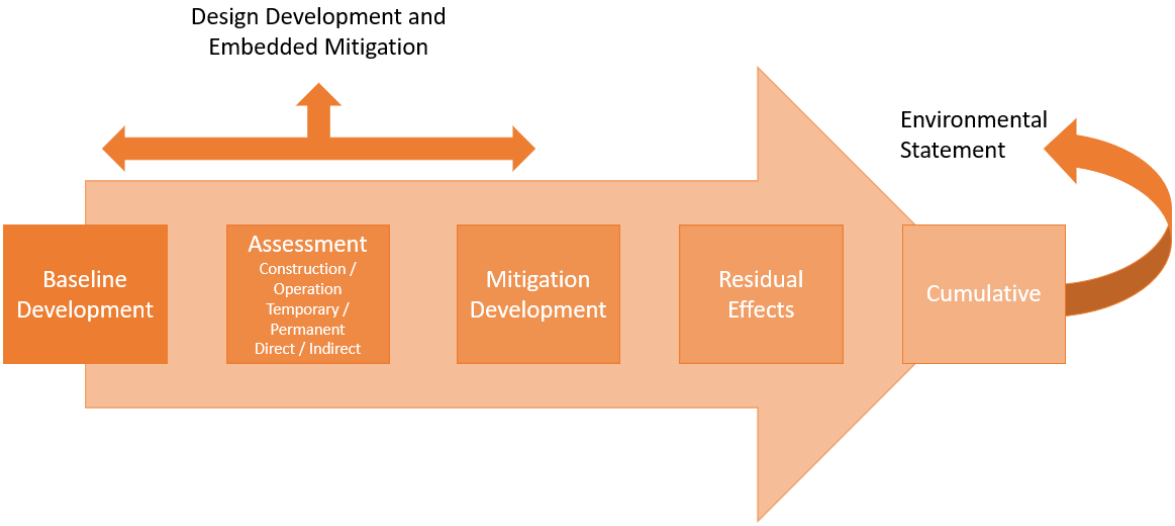
5.1.4 A programme of community consultation will be undertaken by the project team who will continue to engage with third parties and stakeholders throughout the planning process.

6. EIA Approach and Methodology

6.1.1 The general approach to assessment will establish a baseline for each topic. Receptors and resources will be identified, and their sensitivity classified. The potential impacts of the Proposed Development on these receptors and resources will be assessed, for the construction and operation of the Proposed Development. Subsequent mitigation of impacts will be considered, along with the identification of likely cumulative and residual effects.

6.1.2 The process that the EIA will take is shown in **Figure 6.1.1** below:

Figure 6.1.1: EIA Assessment Process



6.2 Baseline Development

6.2.1 The EIA will primarily describe environmental impacts in terms of the extent of likely change to the baseline environment. The baseline represents the environmental conditions of the Site at the time of the assessment.

Spatial Scope

6.2.2 The redline boundaries of the Proposed Development is shown in **Figure 1.1.1**. Assessment study areas will vary by topic areas, according to the baseline information and the nature of likely impacts. These will be determined during the EIA.

6.2.3 In terms of the amount of development, the planning application will state a defined amount of residential use (both number of homes and mix), along with the maximum Gross External Area (GEA) floorspace to be provided for the different uses.

6.2.4 The technical aspects of the EIA that apply the amount of development for the purposes of the assessment of impacts are as follows:

- Socio-Economics, specifically in relation to population and child yield estimates and so demand for social infrastructure (e.g. healthcare, school places, open space, etc.);
- Transport, specifically in relation to trip generation and modal split (and so indirectly, Air Quality and Noise and Vibration in relation to the assessment of air quality impacts and road traffic noise, respectively); and
- Climate Change Mitigation and Adaptation, specifically in relation to estimating the greenhouse gas emissions expected to be generated by the Proposed Development.

Temporal Scope

6.2.5 The ES will assess the environmental impacts of the Proposed Development during the demolition and construction and operational stages. **Section 7** of this report sets out which phase of the Proposed Development each topic proposes to assess based on the predicted impacts and the baseline conditions. The assessment will compare current and future baseline conditions (as appropriate) to those conditions expected with the demolition and construction and operation of the Proposed Development. The assessment will assume that the demolition and construction works will take approximately 4 years in total, subject to securing planning permission.

6.2.6 The assessment will consider the totality of the Proposed Development from demolition and construction through to operation, using the following assessment scenarios:

- existing baseline;
- future baseline (without Proposed Development);
- assessment of peak demolition and construction effects;
- assessment of operational effects (all demolition and construction complete, the Proposed Development fully occupied and operational).

6.2.7 The point at which peak demolition and construction effects are anticipated varies between assessment topics. For those assessments driven by the effects of traffic, peak demolition and construction traffic is likely to lead to peak effects. For assessment topics where effects are driven by massing, effects are likely to increase over the duration of the construction period. Effects related to the sub-surface will be greatest during enabling works, excavation and substructure stages.

6.2.8 This assessment of peak demolition and construction effects will assess a worst-case scenario and, therefore, be a conservative assessment of any interim effects;

therefore, no time-slices or interim construction assessments are considered necessary for most topics. This will be reviewed on a topic-by-topic basis.

Scenarios for the Assessment of Operational Effects

6.2.9 Given that two separate planning applications will be submitted to the LBC (one for Site A and one for Site B), but one ES will be prepared to assess the Proposed Development across both Sites, a number of scenarios will be considered within the technical assessments of the EIA. The scenarios to be considered are as set out below.

- Scenario 1: Both Site A and Site B coming forward;
- Scenario 2: Site A coming forward, without Site B; and
- Scenario 3: Site B coming forward, without Site A.

6.3 Assessment of Effects and Defining Significance

Prediction of Impacts

6.3.1 Once impacts have been identified, prediction methods will be used to identify the magnitude and nature of changes to the environment resulting from the Proposed Development, compared to the situation without the Proposed Development (i.e. the baseline conditions). The relative significance of these changes will then be defined using thresholds and criteria, as appropriate.

6.3.2 There are a number of methods available for predicting the effects of the Proposed Development, some of which are qualitative and some quantitative. Quantitative methods predict measurable changes resulting from a development, and hence rely on the ability to measure and or model baseline conditions accurately, for example the concentration of air pollutants. In comparison, qualitative techniques rely on expert judgement; for example, the Heritage, Townscape and Visual Impact Assessment (HTVIA). In these circumstances, a clear distinction will be made between matters of fact and professional judgement.

Evaluation and Assessment of Significance of Impacts

6.3.3 The definition of significance thresholds and criteria will take account of the:

- Value / sensitivity of the resource (international, national, regional and local level importance);
- magnitude of the impact (for example the number of receptors);
- duration of the impact; and
- reversibility of the effect.

6.3.4 Typically, the criteria will be developed from a matrix approach comprising the value / sensitivity of the resource on one axis and the magnitude of the predicted impacts on the other. The classification of effects is shown in **Table 6.3.1**.

Table 6.3.1: Classification of Effects

Value / Sensitivity	Magnitude of Impact		
	Minor	Moderate	Major
Negligible	Negligible	Negligible	Negligible
Low	Minor-negligible	Minor	Moderate-minor
Medium	Minor	Moderate-minor	Major-moderate
High	Moderate-minor	Major-moderate	Major

6.3.5 The classification of the effect will also consider the following descriptors:

- adverse, neutral or beneficial;
- permanent or temporary;
- duration / frequency or likelihood; or
- direct or indirect.

6.3.6 The duration of the effect will be assessed to be either temporary or permanent where:

- temporary (e.g. demolition and construction phase):
- short term (<5 years);
- medium term (5 – 10 years);
- long term (>10 years); or
- permanent (e.g. once the Proposed Development is completed and operational).

6.3.7 **Table 6.3.1** displays a range of effects associated with the magnitude of change and sensitivity as in certain situations the effect may fall within this range, ultimately the level of significance is based upon the professional opinion of the specialist involved and the assessment matrix table is intended as a guide.

Mitigation Development

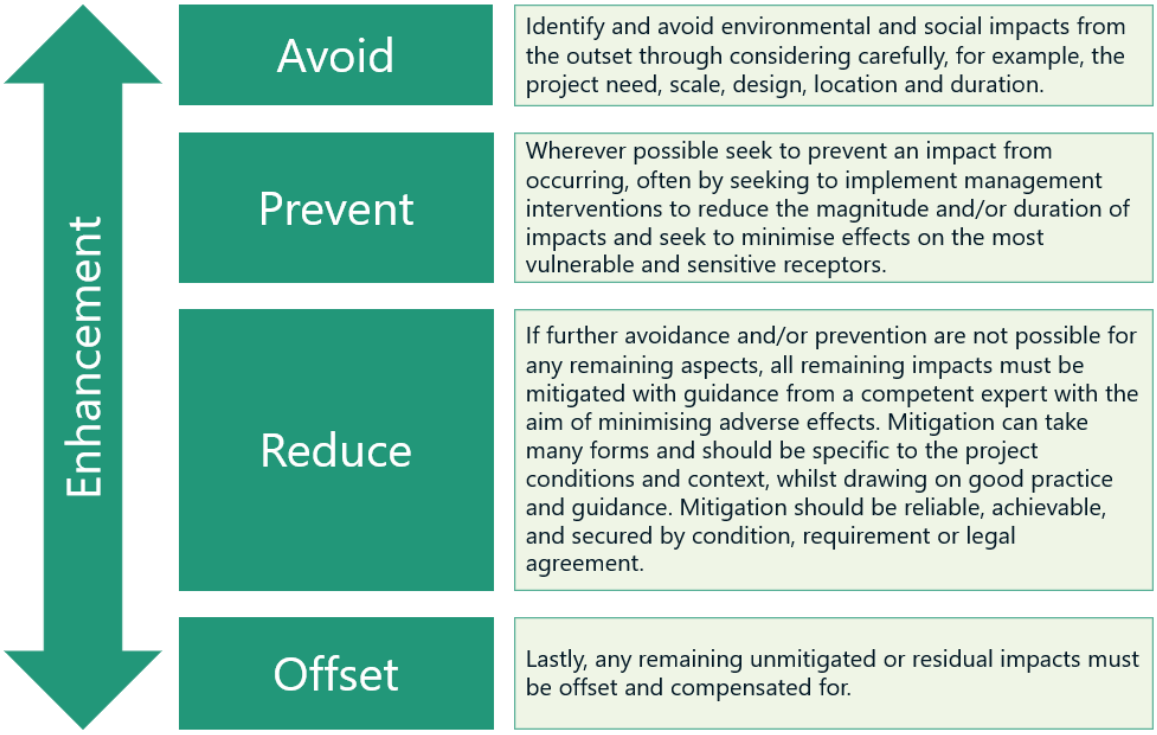
6.3.8 During the EIA, there will be an on-going design process, looking at ways to best mitigate any likely environmental effects through amendments to the design of the Proposed Development. This will constitute embedded design mitigation and where this has occurred it will be identified within the relevant topic chapters within the ES.

6.3.9 Further assessment mitigation measures may be introduced where adverse environmental impacts remain following the culmination of the design process and,

in these instances, further mitigation will be proposed where feasible within the relevant technical chapters. A practical example of this (for illustrative purposes only) could be that all dwellings are designed to fulfil certain requirements in terms of noise insulation (embedded / primary design mitigation); however, the noise assessment may identify, post outputs from modelling, that a specific dwelling requires enhanced glazing specification (additional / secondary assessment mitigation).

6.3.10 Proposals for mitigation will follow the following hierarchy set out in **Figure 6.3.1**. Where beneficial effects and or opportunities for enhancement and betterment are identified, measures to maximise these will also be proposed.

Figure 6.3.1: Mitigation Hierarchy



6.3.11 Design mitigation will include compliance with legislation, industry good practice, Best Practicable Measures (BPM) and construction environmental management procedures. Design features that have been adapted to reduce or prevent impacts will be described.

Residual Effects

6.3.12 The residual effects will be assessed using the same system as described above taking account of any assessment mitigation proposals. Generally, based on the described classification and professional judgement, effects considered to be

moderate or major will be deemed significant, and those considered minor, or negligible, will be deemed not significant.

6.3.13 Residual effects will be presented within each individual topic chapter and summarised in a chapter entitled *Residual Effects and Conclusions.*

Cumulative Effects

6.3.14 The EIA Regulations specify that an ES should include *'a description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative…effects.'*

6.3.15 Cumulative effects are the combined effects of several development schemes (in conjunction with the Proposed Development) which may, on an individual basis be non-significant but, cumulatively, have a significant effect.

6.3.16 Two types of cumulative effects will be considered in the assessment. These include Type 1, intra-project effects (or effect interactions) which are the combined effects of individual topic impacts on a particular sensitive receptor, and Type 2, inter-project effects which are the combined effects of different development projects, alongside the Proposed Development.

6.3.17 Type 1 cumulative effects will be addressed in a separate ES chapter. Type 2 cumulative effects will be assessed in each individual topic chapter. Cumulative effects during both the construction and operational phases of the Proposed Development will be assessed.

6.3.18 The EIA will consider Type 2 cumulative effects from schemes of an appropriate scale and spatial extent in the context of the Proposed Development.

6.3.19 Applying the EIA thresholds for what is more likely to be considered significant development schemes and therefore give rise to cumulative effects, schemes which are likely to produce an uplift of more than 10,000 m^2 (GEA) of mixed use floorspace or over 150 residential units have been considered within a 1 km radius of the Site.

6.3.20 These schemes include:

- approved but incomplete projects (i.e. unimplemented or under construction);
- projects for which a planning application has been submitted and which are under consideration by the consenting authorities;
- project for which a request for an EIA Scoping Opinion has been submitted; and
- for certain topics (e.g. visual impact) it may be appropriate to include developments outside of this area of search, should those projects individual characteristics warrant it (e.g. a particularly tall building). Additional schemes for each topic will be identified within the individual topic chapters.

6.3.21 Whilst three scenarios will be considered as part of the assessment of operational effects of the Proposed Development, it is deemed that only one cumulative effects assessment scenario will need to be considered, which will represent the worst-case scenario. Nevertheless, a qualitative assessment will be undertaken, to demonstrate any potential change in the cumulative effects considered likely to arise as a result of the Proposed Development in conjunction with other committed development, should Site A come forward without Site B, and vice versa.

6.3.22 From an initial planning search, the developments set out in **Table 6.3.2** have been identified as 'major development' likely to have potential to generate significant inter-project effects. **Figure 6.3.2** shows the locations of these committed developments, as well as the 1 km search boundary applied.

6.3.23 LBC officers are invited to identify any committed or consented major developments that they believe is likely to require consideration within the ES as a result of likely significant inter-project environmental effects.

Table 6.3.2: Committed Developments

No.	Development	Planning Application Ref.	Summary of Development	Distance from Site (km)	Planning Status
1	Agar Grove Estate Agar Grove London NW1 (LBC)	2023/0362/P	Variation of condition 63 (approved plans) - to increase size of proposed ASHP enclosures on Blocks JKL and I.	Directly adjacent to the west of the Sites (Site A specifically)	Approved 12.02.2024
		2022/2359/P	Variation of condition 63 (approved plans), 61 (housing mix) - to allow adjustments to Block B, including addition of second stair cores and evacuation lifts; revised unit mix; reduction in 11 units; additional cycle storage; and changes to external appearance.		Approved 20.12.2022
		2019/4280/P	Variation of condition 60 (approved plans), 61 (Number and mix of residential units) and 6 (lifetime homes) - to allow adjustments to footprint, height, massing and external appearance of Block I and Block JKL, including revised balcony design; revised flat layouts; changes to unit type and mix; 14 additional Class C3 residential units; and associated landscaping.		Approved 13.10.2020
		2015/6240/P	Variation of Condition 60 (Approved Plans) - to allow for the removal of two additional trees.		Approved 10.12.2015
		2015/5160/P	Variation of Condition 50 (Approval in Principle document) - The rewording of the condition to allow the AIP document to be submitted prior to commencement of work adjoining the highway in phases 3, 4 and 5 will ensure the submitted AIP document can accurately reflect works proposed in those phases at the time of implementation whilst		Approved 11.11.2015

No.	Development	Planning Application Ref.	Summary of Development	Distance from Site (km)	Planning Status
			allowing phases 1 and 2 of the development to commence in the meantime.		
		2015/3443/P	Varying Condition 40 (Public open space contribution) – amending trigger from pre-commencement to prior to the occupation of Phase 1 (Block A) and to be maintained.		Approved 11.08.2015
		2013/8088/P	Demolition of all existing buildings and structures except Lulworth House and Agar Children's Centre (249 existing Class C3 residential units and 2 retail units), and erection of new buildings ranging between 4 and 18 storeys in height along with the refurbishment and extension of Lulworth House (extending from 18 to 20 storeys in total) to provide a total of 493 Class C3 residential units, comprising 240 market, 37 intermediate and 216 social rent units; a community facility (Class D1); 2 flexible retail shop (Class A1) or restaurant and cafe (Class A3) units; business space (Class B1(a)); 2 flexible retail shop (Class A1), business (Class B1) or non-residential institution (Class D1) units; refuse and recycling facilities; car and cycle parking facilities; landscaping / amenity space; and associated works.		Approved 04.08.2014
2	Land to the North of the British Library 96 Euston Road London NW1 2DB (LBC)	2022/1041/P and 2022/1320/L	Demolition of the British Library Centre for Conservation, alterations to the British Library and erection of a new building of 12 above-ground storeys and two basement levels for use as library, galleries, learning, business and events spaces (Class F1) and retail and commercial spaces (Class E); provision of internal and external public spaces,	0.92 km to the south	Approved on 17.07.2024

No.	Development	Planning Application Ref.	Summary of Development	Distance from Site (km)	Planning Status
	LBC Draft Site Allocation S16 (IDS19)		landscaping and a community garden; improvement works adjacent to Dangoor Walk; provision of cycle and car parking and servicing facilities including new crossovers; provision of Crossrail 2 infrastructure; means of access; and associated works.		
3	33 - 35 Jamestown Road London NW1 7DB (LBC)	2024/4953/P	Demolition of existing buildings and structures to facilitate redevelopment comprising a Purpose Built Student Accommodation (Sui Generis) block over the basement, ground, plus six storeys and seventh-floor plant room with flexible commercial (Class E) on the ground floor and a residential (Class C3) block over the ground plus five storeys. Each block has two private courtyards with hard and soft landscaping, cycle parking, and associated works.	0.98 km to the west	Submitted 11.11.2024
4	Barnsbury Estate, Copenhagen Street, Islington, London, N1 London Borough of Islington (LBI)	P2022/1898/FUL	Hybrid planning application for the phased redevelopment of the site comprising: 1. Phased demolition of all existing buildings and structures, site preparation and enabling works (including excavation), phased construction of buildings (including basements) comprising residential units (Use Class C3); Hard and soft landscaping works including public open space access and highway alterations, car and cycle parking provision, and; All other associated ancillary works (No Matters Reserved for	0.98 km to the south-west	Approved on 23.03.2023

No.	Development	Planning Application Ref.	Summary of Development	Distance from Site (km)	Planning Status
			future approval (the 'detailed element')); and 2. Site preparation and enabling works (including excavation), phased construction of buildings (including basements) comprising residential units (Use Class C3) and flexible commercial, business and service floorspace (Use Class E) and local community floorspace (Use Class F2); Hard and soft landscaping works including public open space, access and highway alterations, car and cycle parking provision, and; All other associated ancillary works (All Matters Reserved for future approval (the 'outline element')) (Departure from the Development Plan)		
5	2-6 St Pancras Way, London, NW1 0TB (LBC) LBC Draft Site Allocation S22 (CSP7d)	2017/5497/P; s73 2021/1239/P	Demolition of the existing building (Class B1 and B8) and erection of 6 new buildings ranging in height from 2 storeys to 12 storeys in height above ground and 2 basement levels comprising a mixed use development of 54,247sqm business floorspace (B1), 73 residential units (C3) (10xstudio, 30x1 bed, 27x2 bed 7x3 bed), 87 bed hotel (C1), 1,601sqm gym (D2), 6,104sqm flexible retail (A1 - A4/A1-A4,B1/A1-	0.15 km to the south-west	Approved on 17.03.2020

No.	Development	Planning Application Ref.	Summary of Development	Distance from Site (km)	Planning Status
			A4,B1,B8) and 6,011sqm storage space (B8) development with associated landscaping work.		
6	The Ugly Brown Building, 2 St Pancras Way, NW1 0QG (LBC) LBC Draft Site Allocation S22 (CSP7d)	2021/2671/P	Demolition of existing building, and redevelopment to provide a mixed use development comprising a 9 storey building (Plot B) with two basement levels, for use as Class E and Drinking Establishment (Sui Generis), a two-storey Pavilion (Plot C4) for Class E and Drinking Establishment (Sui Generis), along with associated cycle parking, servicing, hard and soft landscaping, public realm, and other ancillary works, alongside amendments to Plot C within planning permission 2017/5497/P, namely increase of affordable housing provision in Plot C2.	0.38 km to the south-west	Approved 07.11.2022
7	Belgrove House Belgrove Street London WC1H 8AA (+ Acorn House, Gray's Inn Road) (LBC) LBC Draft Site Allocation S13 (IDS16)	2022/1515/P (amending 2020/3881/P) + 2020/3380/P	Redevelopment of Belgrove House as a part 5 part 10 storey building plus 2 basement levels for use as office and research and laboratory floorspace; with café, flexible retail and office floorspace at ground floor; an auditorium at basement; incorporating step free entrance to Kings Cross Underground station in place of two entrance boxes along Euston Road; together with terraces at fourth and fifth floor levels, servicing, cycle storage and facilities, refuse storage and other ancillary and associated works'	1.0 km to the south	Original planning application approved on 01.11.2021; S73 granted 20.02.2023
8	Land at York Way Estate, York Way, London N7	P2021/0969/FUL	Demolition of existing community centre building and MUGA and the erection of four blocks of between four and seven storeys (Buildings A, B & C - part six and part seven storeys and Building D - four storeys)	0.64 km to the north-east	Approved on 27.07.2021

No.	Development	Planning Application Ref.	Summary of Development	Distance from Site (km)	Planning Status
	(LBI)		to provide a total of 91 x Class C3 units (17 x studios, 25 x 1-bed, 21 x 2-bed, 25 x 3-bed & 3 x 4-bed), a community centre and estate office, estate wide play space and landscaping. Alterations to vehicular, service and pedestrian access from North Road, York Way and Market Road, pedestrian footpaths and ramps, car and cycle parking and other associated works including landscaping; amenity space; and refuse storage.		
9	Former Holloway Prison, Parkhurst Road, London, N7 0NU (LBI)	P2021/3273/FUL	Phased comprehensive redevelopment including demolition of existing structures; site preparation and enabling works; and the construction of 985 residential homes including 60 extra care homes (Use Class C3), a Women's Building (Use Class F.2) and flexible commercial floorspace (Use Class E) in buildings of up to 14 storeys in height; highways/access works; landscaping; pedestrian and cycle connections, publicly accessible park; car (blue badge) and cycle parking; and other associated works.	1.0 km to the north-east	Approved on 05.08.2022
10	Central Somers Town Covering Land At Polygon Road Open Space, Edith Neville Primary School 174 Ossulston Street And Purchese Street Open	2019/5882/P	Variation of conditions 2 (approved drawings), 3 (approved documents), 15 (quantum of housing, plot 7) and 80 (cycle parking, plot 7) of planning permission reference 2015/2704/P dated 14/10/2016 for Demolition of existing buildings and the provision of approximately 2,190sq.m replacement school (Use	1.0km to the south	Approved on 14.10.2016

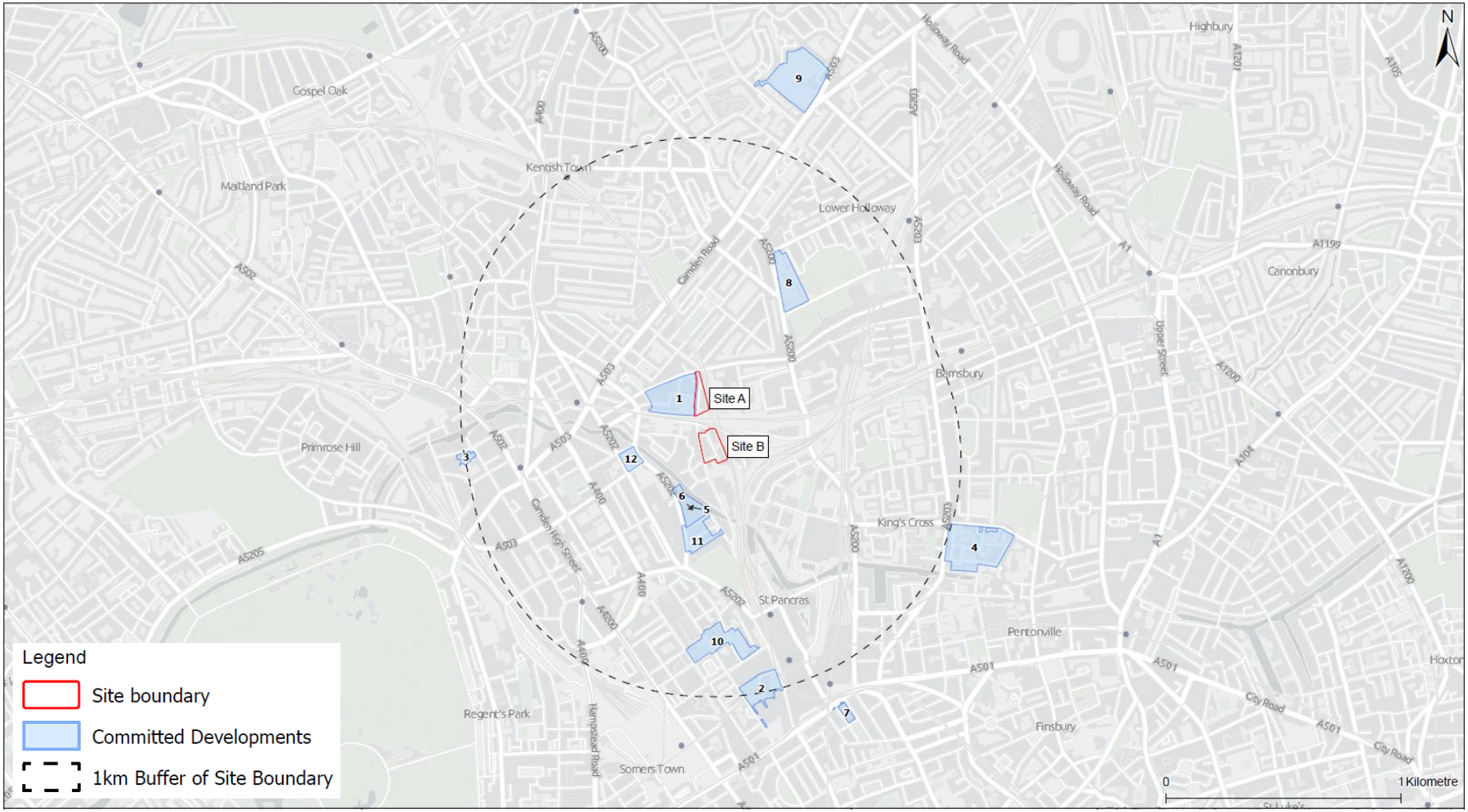
No.	Development	Planning Application Ref.	Summary of Development	Distance from Site (km)	Planning Status
	Space, London, NW1 (Brill Place) (LBC) LBC Draft Site Allocation S31 (IDS20x)		Class D1); approximately 1,765sq.m of community facilities (Use Class D1); approximately 207sq.m of flexible Use Class A1/A2/A3/D1 floorspace and 136 residential units (Use Class C3) over 7 buildings ranging from 3 to 25 storeys in height comprising: Plot 1: Community uses at ground floor (Use Class D1) (approximately 1,554sq.m) to including demolition of existing buildings and the provision of approximately 2,190sq.m replacement school (Use Class D1); approximately 1,765sq.m of community facilities (Use Class D1); approximately 207sq.m of flexible Use Class A1/A2/A3/D1 floorspace and 136 residential units (Use Class C3) over 7 buildings ranging from 3 to 25 storeys in height comprising: Plot 1: Community uses at ground floor (Use Class D1) (approximately 1,554sq.m) to include a children's nursery and community play facility with 10no. residential units above; Plot 2: 35 residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 137sq.m); Plot 3: Extension of Grade II listed terrace to provide 3no. dwellings; Plot 4: Replacement school (Use Class D1) ; Plot 5: 20no. residential units over a replacement community hall (Use Class D1) (approximately 211sq.m); Plot 6: 14no. residential units; and Plot 7: 54no. residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 70sq.m). Provision of 11,765 sqm of		

No.	Development	Planning Application Ref.	Summary of Development	Distance from Site (km)	Planning Status
			public open space along with associated highways works and landscaping. Namely, to include amendments to architectural design, building footprint, internal layouts, quantum of residential units, structural column positions and the energy strategy, in relation to Plot 7, Central Somers Town		
		2015/2704/P	Demolition of existing buildings and the provision of approximately 2,190sq.m replacement school (Use Class D1); approximately 1,765sq.m of community facilities (Use Class D1); approximately 207sq.m of flexible Use Class A1/A2/A3/D1 floorspace and 136 residential units (Use Class C3) over 7 buildings ranging from 3 to 25 storeys in height comprising: • Plot 1: Community uses at ground floor (Use Class D1) (approximately 1,554sq.m) to include a children's nursery and community play facility with 10no. residential units above; • Plot 2: 35 residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 137sq.m); • Plot 3: Extension of Grade II listed terrace to provide 3no. dwellings; • Plot 4: Replacement school (Use Class D1) ; • Plot 5: 20no. residential units over a replacement community hall (Use Class D1) (approximately 211sq.m); • Plot 6: 14no. residential units; and Plot 7: 54no. residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 70sq.m). Provision of 11,765 sqm		Approved on 14.10.2016

No.	Development	Planning Application Ref.	Summary of Development	Distance from Site (km)	Planning Status
			of public open space along with associated highways works and landscaping.		
11	St Pancras Hospital 4 St Pancras Way London NW1 0PE (LBC) LBC Draft Site Allocation S7 (CSP5)	2020/4825/P	Partial redevelopment of the site, involving the demolition of seven existing buildings (Ash House, Bloomsbury Day Hospital, the Camley Centre, Jules Thorn Day Hospital, Kitchen and the Post Room & Former Mortuary) and construction of a part seven, part ten storey (plus roof plant) purpose-built eyecare, medical research and educational centre for Moorfields Eye Hospital, the UCL Institute of Ophthalmology and Moorfields Eye Charity. New building to comprise a mixture of clinical, research and education purposes, including eye care accident and emergency department, outpatients, operating theatres, research areas, education space, cafe and retail areas, admin space and plant space. Associated site relandscaping works including formation of patient drop off area to St Pancras way, new public realm and routes through the site, cycle parking and servicing ramp and cross over to Granary Street.	0.56 km to the north-east	Approved on 08.08.2022
12	St Pancras Commercial Centre 63 Pratt Street London NW1 0BY (LBC)	2019/4201/P	Demolition of existing buildings (Class B1c/B8); erection of 3x buildings ranging in height from 5 to 7 storeys above ground and a single basement level comprising a mixed use development of light industrial floorspace (Class B1c/B8), office floorspace (Class B1), 33x self-contained dwellings (Class C3),	0.4 km to the east	Approved on 24.12.2020

No.	Development	Planning Application Ref.	Summary of Development	Distance from Site (km)	Planning Status
	LBC Draft Site Allocation S21 (CSP7c)		flexible retail floorspace (Class A1/A3); associated access and servicing, public realm, landscaping, vehicular and cycle parking, bin storage and other ancillary and associated works		

Figure 6.3.2: Location of Committed Developments



6.4 Demolition and Construction

6.4.1 The ES will include a chapter describing the proposed demolition and construction methodology, the likely phasing of the Proposed Development and the proposed demolition and construction timescales. It will indicate the likely plant and equipment to be used, demolition and construction traffic access and management, the location and size of demolition and construction welfare facilities, materials and resource use and anticipated waste quantities.

6.5 Consideration of Alternatives

6.5.1 The ES will include consideration of the main alternatives considered during the design process, such as the location and types of land uses and layouts. The rationale for the selection of the preferred option will also be included within the ES, which will include a comparison of the environmental effects associated with each of the alternatives considered.

7. Proposed Environmental Topics to be included in the ES

7.1 Topic Sections

7.1.1 The following topics are proposed to be scoped into the ES and these are further described below:

- Socio-Economics;
- Transport;
- Air Quality;
- Noise and Vibration;
- Wind Microclimate;
- Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution;
- Climate Change Mitigation and Adaptation; and
- Heritage, Townscape and Visual Impact Assessment.

7.2 Socio-Economics

Summary of Baseline Conditions and Anticipated Sensitive Receptors

7.2.1 Site A is located in the Camden Square ward, whilst Site B is situated in the King's Cross ward, both of which are within the London Borough of Camden (LBC). According to the most recent population statistics, the population of the Camden Square and King's Cross wards were 7,604 and 12,072, respectively. In 2021, the working age population (16-64 years) of the wards was 75% (Camden Square) and 80% (King's Cross) and, higher than LBC (73%), London (69%) and England (63%). Economic inactivity rates within King's Cross were high at 49% compared to Camden Square (35%), LBC (37%), London (34%), and England (39%).

7.2.2 Regarding education, there are 74 primary schools (located within a 2-mile walking distance of the Sites) with a surplus of 3,871 places. There are 38 secondary schools (situated within a 3-mile walking distance of the Sites) with a surplus of 3,188 places. There are also 10 nurseries located near the Sites.

7.2.3 According to local self-assessed health indicators, 54% (Camden Square) and 53% (King's Cross) of residents believe themselves to be of very good health, roughly in line with LBC (56%) and London (56%), though slightly higher than

the national average (49%). There are no GPs within a 1 km catchment of the Sites, though there are 3 GPs within a 2 km catchment of the Sites, namely James Wigg Practice (1.3 km, 17-minutes' walk), Barnsbury Medical Practice (1.5km, 20-minutes' walk) and Kings Cross Surgery (1.5km, 20-minutes' walk). There are also4 dental practices within 1 km of the Sites.

7.2.4 The Sites falls across three lower super output areas (LSOAs): Camden 019D, Camden 019C, and Camden 022B. Camden 022B ranks as the most deprived of the three LSOAs, scoring in the top 20% most deprived decile. Camden 019D and Camden 019C, however, both score in the top 40% most deprived decile in the country.

7.2.5 The Sites are situated near a range of community and leisure facilities, including community centres, libraries and leisure centres. In addition, the Site is near a variety of open and play spaces, including Elm Village Open Space (0.08 miles, 1-minutes' walk), Camden Square Gardens (0.3 miles, 7-minutes' walk), St Pancras Gardens (0.4 miles, 9-minutes' walk), and St Martins Gardens (0.5 miles, 10-minutes' walk).

7.2.6 In terms of crime, Camden Square ward and King's Cross ward experienced 949 and 3,332 total crimes between December 2023 and December 2024 respectively. In the Camden Square ward, "Other Theft" (197 crimes) and "Violence Without Injury" (180 crimes) were the most prevalent crime categories. Within King's Cross, "Other Theft" was also the most prevalent at 776 crimes, followed by "Theft From the Person" (710), "Violence Without Injury" (374 crimes) and "Shoplifting" (203 crimes).

7.2.7 The anticipated sensitive receptors include housing, primary education, secondary education, childcare, healthcare, open space and play space, crime, community and recreational facilities, the local economy, employment and skills, along with town and other centres.

Key Issues and Potential Likely Impacts Identified

Demolition and Construction Phase

7.2.8 The demolition and construction of the Proposed Development is likely to result in the temporary creation of demolition and construction employment. Furthermore, a temporary effect is likely to affect the town and other centres, as a result of additional spending from the demolition and construction workforce.

Operational Phase

7.2.9 The operational Proposed Development is likely to result in a permanent effect via the provision of new housing. Permanent jobs will also be generated by the operation of the Proposed Development. The town and other centres are likely

to be subject to spending of the additional population and workers, resulting in a further potential permanent effect.

7.2.10 Potential adverse effects may be experienced by the following receptors due to increased demand from the new residential population: education; childcare; healthcare; community and recreational facilities; as well as open and play space.

Assessment Methodology

Determination of the Baseline

7.2.11 The baseline for the socio-economic conditions of the local area will be established from a number of sources, including: the 2021 Census[35], which is the most up to date source of information on social and housing conditions at a local level; annual population surveys for economic data; lists of the community facilities that serve the study area published by LBC, Greater London Authority (GLA), the National Health Service (NHS) and other organisations.

7.2.12 Impacts on social and economic determinants and facilities will be assessed using various geographical impact areas, depending on the likely geographical extent of an impact. These reference areas will be compared with socio-economic information for the Borough, London region and England as a whole

7.2.13 Though neither of the two wards are identified as specific areas of high crime, the Camden Local Plan requires all developments to incorporate design, layout and access measures to help reduce opportunities for crime, fear of crime, and must create safer, more secure environments. For this reason, crime has been scoped into this assessment.

7.2.14 **Table 7.2.1** below shows the spatial area of impact that will be applied for the baseline and assessment. There is no standard guidance for assessing socio-economic effects. Therefore, the significance of socio-economic effects will be based on existing best practice guidance, where available. If not available, professional judgement will be applied.

Table 7.2.1: Geographical Area of Impact for Different Socio-Economic Themes

Theme	Geographical Area of Impact
Local Population and Demographics	LBC, Camden Square and King's Cross wards.
Housing	LBC.

[35] Office for National Statistics (ONS). (2021). Census 2021. Accessed: Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics

Theme	Geographical Area of Impact
Childcare	1 km road travel distance from the Sites.
Education	State funded primary schools – 2 miles road travel distance from the Sites.
	State funded secondary schools – 3 miles road travel distance from the Sites.
Health	GP surgeries and NHS dentists within 1 km of the Sites (road travel distance).
Community and Leisure Facilities	Government funded library, leisure / sports centre, youth and community centres within 1 km of the Sites (road travel distance).
Crime, Fear of Crime, and Anti-Social Behaviour	LBC.
Open and Play Space	400 m (local parks and open spaces) and 1.2 km (district parks) road travel distance[36]; play space requirements based on the GLA Population Yield Calculator.
Local Economy, Employment and Skills	LBC / Greater London.
Town and Other Centres	LBC.

Prediction Methodology

7.2.15 Assessments will be undertaken in the context of national and local planning and other policy, e.g. LBC housing targets. In addition to the baseline data, the assessment of effects will be underpinned by estimates for both the demolition and construction and operational phases.

Demolition and Construction Phase

7.2.16 Effects during the demolition and construction phase will be assessed for the full duration of the demolition and construction period. Gross employment in the demolition and construction phase of the Proposed Development will be estimated from:

- The estimated cost of the demolition and construction works;
- Estimates of turnover per employee from Business Population Estimates produced by the Department for Business, Energy & Industrial Strategy (formerly Department for Business Innovation and Skills); and

[36] Based on GLA London Plan 2021 – Table 8.1 - Public open space categorisation.

- A conventional assumption that ten years of short-term work equates to one full-time equivalent (FTE) job.

Operational Phase

7.2.17 Fundamental to the operational assessment will be an estimate of the likely population of the Proposed Development. This estimate will be based on the GLA Population Yield Calculator which will provide contextual evidence to estimate the likely size of the future population generated by the Proposed Development. This estimate will inform the assessments of additional demand for healthcare services and other social infrastructure.

7.2.18 The following benchmarks will be used to calculate the likely demand for school places and the likely GP demand created from the Proposed Development:

- Schools – estimates of primary and secondary places based on GLA population yield calculator; and
- GPs – average numbers of patients to GP ratios in the UK from NHS Digital.

7.2.19 The assessment of net employment effects will employ the approach set out in the Homes and Communities Agency's Additionality Guide[37] in order to eliminate (as far as possible) additional jobs that would have been created anyway regardless of the Proposed Development. The additionality assessment also takes account of the reference case (the employment on-site if the intervention did not go ahead), leakage effects and indirect and induced employment, which contribute to the overall multiplier. The proposed measures for these are outlined in **Table 7.2.2**. Net additional employment calculations will take into any existing jobs expected to be lost on-site as part of the Proposed Development.

Table 7.2.2: Proposed Levels of Leakage, Displacement and Multiplier Effect

	Demolition and Construction Jobs	Operational Jobs
Leakage	Medium	Medium
Displacement	Medium	Medium
Multiplier	TBC	TBC

7.2.20 The economic and regeneration effects of the Proposed Development will be included within the assessment; for example, the stimulation of spending in the local area.

[37] Homes England (2014). Additionality Guide: Fourth Edition 2014.

7.2.21 The assessment of operational employment will estimate the net additional employment that will be generated by the Proposed Development.

Mitigation Recommendation

7.2.22 The socio-economic assessment will also explore the scope for mitigation and enhancement measures which could be valuable to the local economy and community.

7.2.23 The residual effects of the Proposed Development during both the demolition and construction and operational phases will be presented within the ES chapter.

7.3 Transport

Summary of Baseline Conditions and Anticipated Sensitive Receptors

7.3.1 The Proposed Development will comprise of two Sites at the northern end of Camley Street. The Sites were constructed in the 1970s as part of a redevelopment of former railway industrial land and currently house a range of industrial and warehousing units comprising 7,289 sqm Gross Internal Area (GIA) over the two Sites.

7.3.2 The two Sites are separated from each other by a Network Rail owned railway bridge that has a vehicular / cycle / pedestrian underpass, with a vehicle height restriction of 4.05 m.

7.3.3 Site A (120 to 136 Camley Street) is a triangular plot located between Agar Grove at its northern end and railway line to the south. The east boundary of Site A is bordered by active railway lines. The western boundary comprises a circa 5m change of level along its length that runs parallel to Wrotham Place, the adjacent Agar Grove Estate access road and lies at a lower level than an adjacent shared footway and cycleway ramp linking from Camley Street to Agar Grove in the north. Site A currently comprises single storey units accommodating commercial uses and hardstanding to the frontage, dominated by car parking and vehicles.

7.3.4 Site B (Cedar Way Estate) comprises 1-2 storey units accommodating commercial uses and hardstanding to the frontage, dominated by car and servicing vehicle parking. The units are served by Cedar Way, which is a two-way internal access road connecting to Camley Street with two priority junctions. Site B is rectangular in shape and is bounded by the railway tracks to the east, Camley Street to the west, commercial land to the south and the railway to the north, including a railway compound (Network Rail High Speed Limited) with ramped vehicular access to the railway lines.

Walking and Cycling

7.3.5 The local street network has an established network of footways typical of an urban environment, providing access to the Sites, nearby facilities, amenities and local bus stops. All local roads in the area have footways on both sides of the carriageway.

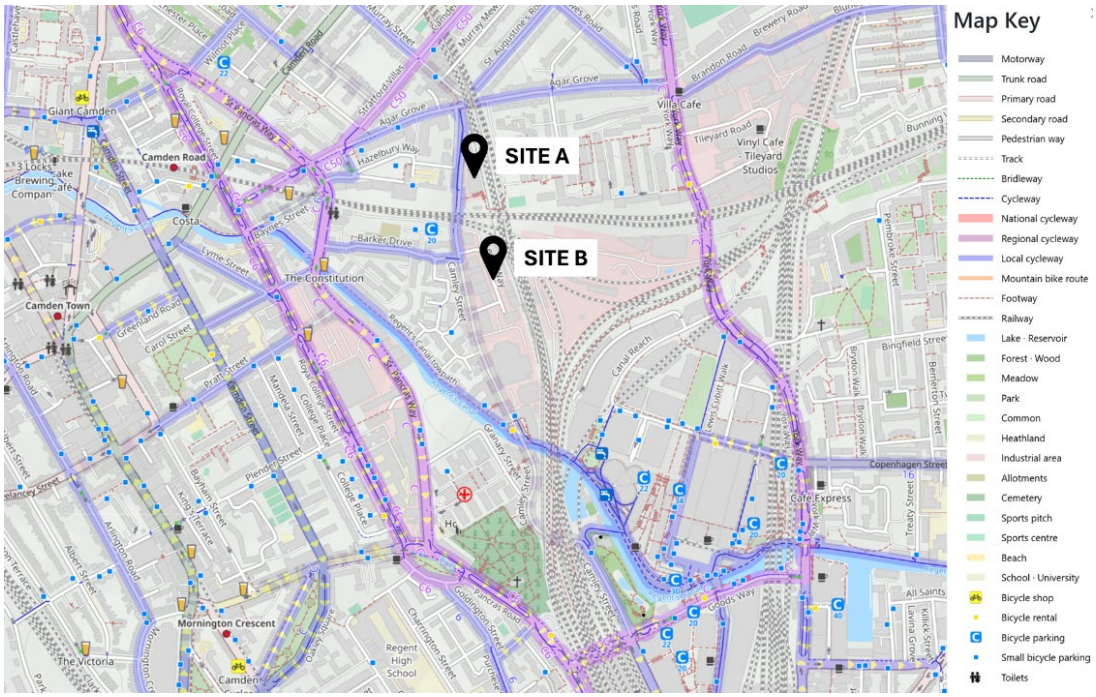
7.3.6 Camley Street and the shared footway/cycleway ramp that runs alongside Site A, form a local north-south route for pedestrians and cyclists between Kings Cross and Agar Grove. The ramp runs parallel to Wrotham Road on the Agar Grove Estate which lies to the immediate west of Site A, but at a higher level. The route is circa 150 m-long, and a 5 m wide sloping path starts just north of the railway bridge and connects to Agar Grove in the north. The landing north of the bridge is awkward for cyclists and involves 90 degrees turns to re-join the carriageway.

7.3.7 Camley Street passes underneath the railway bridge for circa 40m which is a dark and uncomfortable space with narrow footways which are raised above the carriageway.

7.3.8 Where Camley Street passes Site B, it is circa 14 m wide with a 7 m wide carriageway and footways on both sides. Resident permit and Pay-by -Phone parking bays are located along the western side of the carriageway. The western footway is circa 5 m wide and includes large mature trees and are planted close to the edge of the footway. This section of Camley Street lacks active frontages and natural surveillance.

7.3.9 **Figure 7.3.1** shows the cycle network in the vicinity of the Sites; to the north is Cycleway C50 and to the east and west of the Sites is C6 which runs from Kentish Town to Elephant and Castle. There are a number of local cycle routes in the vicinity of the Sites including Camley Street, Barker Drive and the Regent's Canal Tower Path.

Figure 7.3.1: Cycle Map

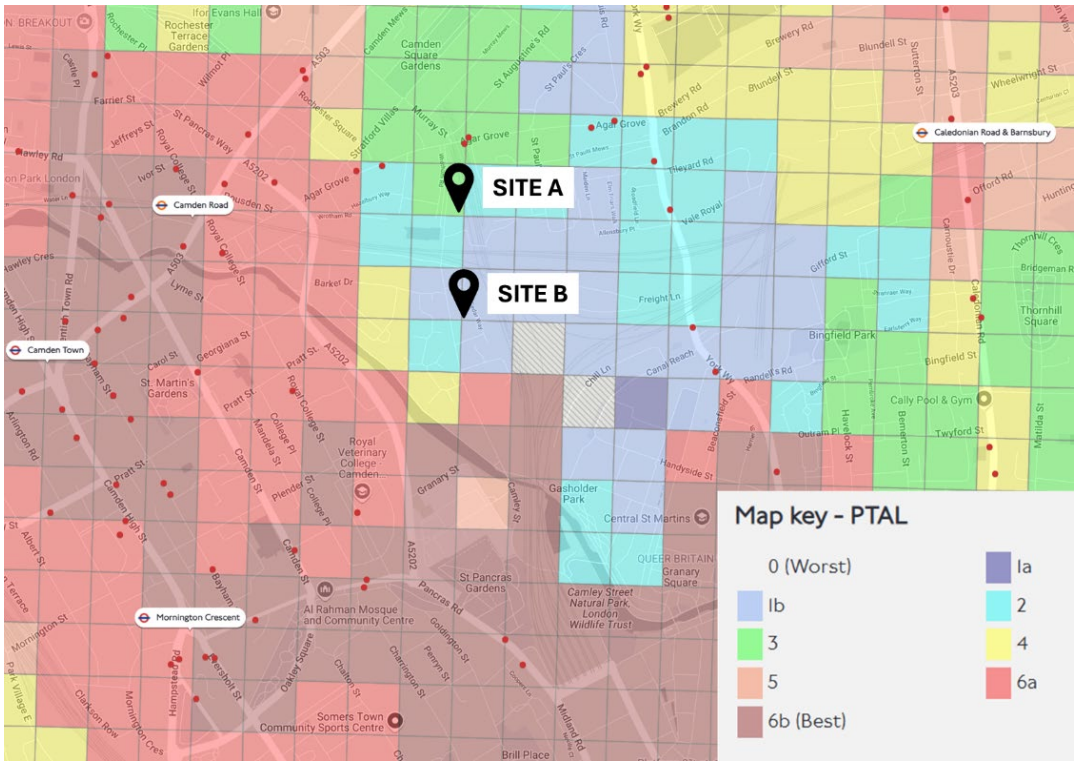


Public Transport Accessibility

7.3.10 A Public Transport Accessibility Level (PTAL) provides a measure of the accessibility of a given point to the public transport network, taking into account walking time to a public transport node, service accessibility, service quality and frequency.

7.3.11 The Sites have a PTAL ranging from 1b to 3. The PTAL measure ranges between 0 and 6b, with 0 indicating the areas with the lowest accessibility to public transport and 6b the areas with the highest accessibility to public transport. This is indicated in **Figure 7.3.2**.

Figure 7.3.2: PTAL Map



Bus Services

7.3.12 The nearest bus stops are located to the north of the Sites along Agar Grove, approximately 400 m away from Site B, around a 5-minute walk. The stops have a shelter, seating and a flag and a post with some timetable information. The bus stops are served by route 274, with destinations including Angel, Caledonian Road & Barnsbury Station, Camden Road and Camden Town Station, Baker Street Station and Lancaster Gate Station.

7.3.13 Camden Town Station is located circa 600 m to the west of the Sites and provides access to services 24, 27, 29 and 134 and the Camden High Street bus stops are located 50m on from that and provide access to routes 1, 24, 27 and 31.

National Rail

7.3.14 The Sites are located within proximity to three railway stations, those being Kings Cross Railway Station, St Pancras International Station and the London Overground services located at Camden Road.

London Underground

7.3.15 The nearest underground stations to the Sites are Camden Town and Kings Cross St Pancras Underground Station.

7.3.16 Camden Town is located 1 km to the west of the Sites which is around a 13-minute walk or a 5-minute cycle. The station is served by the Northern Line and provides frequent services in each direction.

7.3.17 Kings Cross St Pancras Underground Station is located approximately 1.2 km to the south of the Sites, which is around a 15-minute walk or a 5-minute cycle. The station is served by the Circle, Metropolitan, Hammersmith & City, Northern, Picadilly and the Victoria Lines. All lines run frequent services in both directions.

Local Highway Network

7.3.18 Both Sites are bounded to the west by Camley Street, which is a two-way, single-carriageway road and restricted to 20 mph. At the most northern end of Camley Road, it is a no-through road. Camley Street can be accessed from Granary Street to the southwest of the Sites or via the junction for Goods Way/Pancras Road to the south of the Sites.

Existing Baseline Data

7.3.19 Traffic surveys, pedestrian and cycle surveys and parking surveys were undertaken in June 2022. It is anticipated that any further / updated information to that already held will be dependent on the outcome of the scoping discussions with LBC and Transport for London (TfL).

Future Baseline Data

7.3.20 The Future Baseline Scenario (Do Minimum) includes any changes which are committed to take place to existing conditions by the future design year.

7.3.21 LBC is invited to advise on any committed developments or highway schemes to be considered within the submitted Transport Assessment (TA).

Potential Sensitive Receptors

7.3.22 The potential sensitive receptors considered are those people making journeys within the assessment area for each mode. The receptors considered for each travel mode are:

- Those people travelling by that mode (i.e. walking, cycle, bus, car etc.); and
- Those people travelling by other modes, but which are affected by the mode in question.

7.3.23 For example, a significant increase in vehicle activity on a route with pedestrian crossings may increase delay for pedestrians crossing the road, as well as impact upon cyclist (i.e. safety and delay). The modes to be considered include:

- Pedestrians, which are of high sensitivity; and

- Cyclists which are of high sensitivity.

7.3.24 As the Proposed Development is to be car-free and there is an expected reduction in traffic flows, the non-motorised users are those which may be sensitive to changes in traffic conditions, whereas other user groups (motorists and freight vehicle and public transport) will not be affected by the changes in traffic conditions.

7.3.25 The sensitive receptors that will be introduced on the Sites are the residents, visitors and employees at the Proposed Development travelling by the same modes identified above and with the same sensitivity.

Key Issues and Potential Likely Impacts Identified

7.3.26 Key issues which relate to transport and access include the following:

- Severance of communities;
- Road vehicle driver and passenger delay;
- Non-motorised user delay;
- Non-motorised amenity;
- Fear and intimidation on and by road users;
- Road user and pedestrian safety; and
- Hazardous / large loads.

7.3.27 The below sections set out whether the potential effects are proposed to be scoped in or scoped out of the assessment for both the demolition and construction period and the operational phase of the Proposed Development, as well the basis for these judgements.

Severance

7.3.28 Severance is the perceived division that can occur within a community when it becomes separated by an increase in traffic on a route that separates people from other people and places. It can also relate to locations where even low increase in traffic flows impede pedestrian access to essential facilities. The effects of severance can be applied to motorists, pedestrians or the Sites' users, but it is recognised that there are no predictive formulae which give simple relationships between traffic factors and levels of severance.

Demolition and Construction Phase

7.3.29 An Outline Construction Logistics Plan (CLP) will be prepared as part of the planning submission within the TA, and this will provide details on the expected volume of movements. The Outline CLP will also provide details on the expected demolition and construction traffic routing and restrictions on when

demolition and construction vehicle movements can take place. Demolition and construction traffic routes will follow the Transport for London Road Network (TLRN) as much as possible. Whilst potential restrictions on when movements can occur will be addressed through the planning submission and discussions with the Highway Authorities, it is likely that demolition and construction traffic movements will be restricted during key periods of the day such as the morning peak period and the period around the end of the school day. The volume of demolition and construction traffic as a proportion of the daily traffic volumes on the TLRN is likely to be low with minimal movements on local roads. Typical throughput of demolition and construction vehicles able to attend a constrained site, like that of the Proposed Development, would be in the order of 30 vehicles per day, and it is anticipated that this will likely be an increase of traffic flow/heavy duty vehicles (HDV) of less than 30% where the effect would be negligible.

7.3.30 As such, likely significant effects are not anticipated, and severance is proposed to be 'scoped out' of the assessment during the demolition and construction phase.

Operational Phase

7.3.31 The Proposed Development is seeking to reduce existing levels of car parking and given the change in nature of their use (residential rather than light industrial) in this location, it would be expected to reduce associated vehicle movements. Servicing movements will be assessed in more detail as there is a greater potential for an increase in activity, however the order of magnitude of change is unlikely to generate anything other than a negligible effect.

7.3.32 Severance is therefore proposed to be 'scoped out' of the assessment of the Proposed Development in the operational phase.

Road Vehicle Driver and Passenger Delay

Demolition and Construction Phase

7.3.33 No likely significant effects to driver / bus delay and pedestrian and cyclists delay are anticipated. Camley Street is a dead-end road and from 108 Camley Street access, only serves the Sites. It is expected that demolition and construction traffic will be reduced from the existing situation. Therefore, a quantitative assessment of driver / bus delay and pedestrian and cyclists delay during demolition and construction phase is therefore 'scoped out' of the assessment.

7.3.34 The volume of demolition and construction staff travelling by rail or Underground is not expected to significantly increase baseline demand and these staff are also expected to be travelling outside of peak network times. Rail

and Underground delay are therefore proposed to be 'scoped out' of the assessment during the demolition and construction phase.

Operational Phase

7.3.35 It is expected the Proposed Development will have no likely significant effects to driver/bus delay and pedestrian and cyclist delay due the change of use at the Sites and the car-free nature of the Proposed Development which is expected to reduce traffic levels. Bus demand and capacity will be considered within the TA, but a quantitative assessment is 'scoped out' for the operational phase.

7.3.36 The Proposed development is not expected to result in changes which would significantly affect perceptions of rail / underground delay during operation as the number of person trips generated by the Proposed Development in operation is expected to be imperceptible on the wider rail / underground network due to range of services available.

7.3.37 Road Vehicle Driver and Passenger Delay is proposed to be 'scoped out' of the assessment of the operational phase.

Non-Motorised User Delay

Demolition and Construction Phase

7.3.38 It is expected that during demolition and construction, the pedestrian and cycle routes would be altered to enable demolition and construction practices to take place. There may be minor delays when footpaths and highway traffic are instructed to wait to allow construction vehicles to access/egress sites. As such, the Proposed Development could result in changes which would significantly affect perceptions of pedestrian and cyclist delay.

7.3.39 Pedestrian and cyclist delay is therefore proposed to be 'scoped in' for assessment during the demolition and construction phase.

Operational Phase

7.3.40 The Proposed Development is not expected to result in changes which would significantly affect perceptions pedestrian and cyclist delay during operation. Given the likely improvements to pedestrian and cycle routes around the Sites any effect is likely to be positive in that regard albeit not significant.

7.3.41 A detailed quantitative review is therefore proposed to be 'scoped out' of the assessment of the Proposed Development during the operational phase.

Non-Motorised Amenity

7.3.42 Pedestrian amenity is broadly defined as the relative pleasantness of a journey and is affected by traffic flow, traffic composition and pavement width/separation from traffic.

Demolition and Construction Phase

7.3.43 The Proposed Development is not expected to significantly affect perceptions of amenity during the demolition and construction phase; however, there is likely to be some impact. A number of measures will be included within the CEMP or similar to ensure that adverse effects to pedestrian amenity is reduced. Hoardings will be in place around the Sites and a hoarding line around each Site will be maintained during demolition and construction. The existing crossing facilities and footways will be retained during demolition and construction as far as practicable. Pedestrian amenity is therefore proposed to be 'scoped out' of the assessment during the demolition and construction phase.

Operational Phase

7.3.44 As the Proposed Development is expected to result in an increase of non-motorised trips to the Sites, negligible changes to motorised traffic relative to the existing situation, and improvements of the area are expected. It is likely that the Proposed Development could have significant positive effect on the local area; therefore, non-motorised amenity is proposed to be 'scoped in' for the assessment of the Proposed Development during the operational phase.

Fear and Intimidation on and by Road Users

7.3.45 The scale of fear and intimidation experienced by pedestrians is dependent on the volume of traffic, its HDV composition, the speed these vehicles are passing, the proximity of traffic to people and / or the lack of protection created by factors such as narrow pavement median, a narrow path or a constraint (such as a wall or fence) preventing people stepping further away from moving vehicles.

Demolition and Construction Phase

7.3.46 During demolition and construction, the Proposed Development is not expected to result in changes which could affect perceptions of amenity, fear and intimidation as there will be no changes to the local road network junctions, and no fundamental changes to the prevailing travel patterns in the locality. The change in HDV activity relative to the baseline is unlikely to be perceptible. The presence and movement of demolition and construction vehicles will also be managed and secured through the Outline CLP, to minimise the potential for effects on amenity, fear and intimidation in the area.

'Fear and intimidation' are therefore proposed to be 'scoped out' for the assessment during the demolition and construction phase.

Operational Phase

7.3.47 As discussed above, the reduction in car parking at the Proposed Development is expected to result in decreased traffic levels surrounding the Sites, when compared to the baseline situation, having positive effects on fear and intimidation for the Site users and general public. The local area will also continue to be relatively pedestrian-friendly, with roads narrow enough to be crossed easily and clear prioritised routes for cyclists. The Proposed Development is however unlikely to significantly affect perceptions of fear and intimidation; therefore, fear and intimidation is proposed to be 'scoped out' for assessment during the operational phase of the Proposed Development.

Road User and Pedestrian Safety

7.3.48 The key issue in assessing accidents and safety is in understanding the potential for change. There can be some small changes in prevailing road safety conditions arising simply as a result of having a greater number of journeys being made on a network; very simply, the more people that are travelling, the more people that are liable to become involved in an accident. By far the more important issue to consider is how travel and the design of the transport networks interrelate to affect prevailing road safety. In that context, prevailing road safety may change where:

- Fundamental changes are proposed to the form of nature of a transport network such as changes to the geometry of a junction or changing the form of a junction; and
- Fundamental changes are proposed to prevailing travel patterns on transport networks not designed to cater for them such as introducing a pedestrian demand on a rural road without footways or introducing a pedestrian demand across a heavily trafficked and high-speed road without a suitable crossing provision.

Demolition and Construction Phase

7.3.49 During demolition and construction, the HDV activity is not expected to result in changes which could affect accidents and safety. Traffic changes arising from the demolition and construction of the Proposed Development will be low and not considered to be perceptible relative to baseline conditions. Road safety will also be further manged and mitigated through the Construction Logistics and Cycle Safety (CLOCS) scheme and use of contractors registered on the Considerate Contractors Scheme. Accidents and safety are therefore proposed to be 'scoped out' of the assessment during the demolition and construction phase.

Operational Phase

7.3.50 The Proposed Development is not expected to result in changes which could affect accidents and safety during operation. Any effects arising from highway and public realm scheme improvements implemented as part of the Proposed Development are designed to have a negligible or beneficial impact. A qualitative discussion of accidents and safety will be included within the ES chapter for the assessment of the Proposed Development during operation.

7.3.51 Accidents and safety are therefore proposed to be 'scoped out' of the assessment during the operational phase of the Proposed Development.

Hazardous / Large Loads

Demolition and Construction Phase

7.3.52 The demolition and construction stage of the Proposed Development is unlikely to involve the delivery of any large or hazardous material. This effect is therefore proposed to be 'scoped out' of the assessment during the demolition and construction stage.

Operational Phase

7.3.53 The Proposed Development may generate or attract hazardous loads due to the potential life science / laboratory use of part of the Proposed Development. The number of deliveries of hazardous loads is expected to be very low, and all suppliers will follow the UK Transport Legislation, regulations and agreements required for the transportation of hazardous loads.

7.3.54 'Hazardous / large loads' are therefore proposed to be scoped out' of the assessment of the Proposed Development during the operational phase.

Summary

7.3.55 The assessments proposed to be undertaken are summarised in **Table 7.3.1**.

Table 7.3.1: Summary of Proposed Assessment

Assessment Criteria	Proposed Scope	
	Demolition and Construction	Operational
Severance	To be scoped out	To be scoped out
Road Vehicle Driver and Passenger Delay	To be scoped out	To be scoped out
Non-Motorised User Delay	To be scoped in	To be scoped out
Non-Motorised Amenity	To be scoped out	To be scoped in
Fear and Intimidation	To be scoped out	To be scoped out
Road User and Pedestrian Safety	To be scoped out	To be scoped out

Assessment Criteria	Proposed Scope	
	Demolition and Construction	Operational
Hazardous / Large Loads	To be scoped out	To be scoped out

Assessment Methodology

7.3.56 A highways and transport assessment will be undertaken to determine the potential effects of the Proposed Development on the local road network, transport infrastructure and facilities, and access.

7.3.57 The Traffic and Transport ES chapter will be prepared based on information and analysis undertaken as part of the Healthy Streets TA. It will provide sufficient information to enable the reader to understand the likely significant effects of the Proposed Development in relation to transportation and access. The methodology to be applied in the TA is subject to separate parallel scoping discussions with transport / highways officers at LBC and TfL.

7.3.58 The Traffic and Transport ES chapter will be prepared on the basis of the TA, but the ES chapter will provide sufficient information to enable the reader to understand the likely significant effects of the Proposed Development in relation to traffic and transport. The methodology to be applied in the TA is subject to separate but parallel scoping discussions.

Sensitivity Definitions

7.3.59 **Table 7.3.2** below indicates how the sensitivity of each receptor will be identified.

Table 7.3.2: Sensitivity of Receptors

Sensitivity / Value	Definition
High	Receptors which are heavily used (by all users or particularly by vulnerable road users) relative to other receptors within the study area
Medium	Receptors which are used (by all users or particularly by vulnerable road users) to a roughly average level relative to other receptors within the study area
Low	Receptors which are lightly used (by all users or particularly by vulnerable road users) relative to other receptors within the study area

Magnitude of Impact

7.3.60 The magnitude of any impact will be defined in accordance with the Tables below.

Table 7.3.3: Magnitude of Impact

Magnitude	Criteria for Delay, Amenity, Fear and Intimidation, Accidents and Safety and Hazardous Loads
Substantial	Changes which are likely to be perceptible and which would significantly change conditions which would otherwise prevail to the extent that it would significantly affect travel behaviour
Moderate	Changes which are likely to be perceptible and which would materially change conditions which would otherwise prevail to the extent that it may affect travel behaviour to some degree
Slight	Changes which are likely to be perceptible but not the extent that it would materially change conditions which would otherwise prevail
Negligible	Changes which are unlikely to be perceptible

Table 7.3.4: Impact of Percentage Change in Flow

Absolute Change in Flow	Percentage change in flow (Criteria for traffic)			
	<30%	<60%	<90%	>90%
<30 vehicles	Negligible	Negligible	Negligible	Negligible
<60 vehicles	Negligible	Slight	Slight	Slight
<90 vehicles	Negligible	Slight	Moderate	Moderate
>90 vehicles	Negligible	Slight	Moderate	Substantial

7.3.61 The inclusion of the absolute change criteria reflects the fact that the percentage change criteria are derived from studies of major changes in traffic flow. This seeks to prevent non-sensical and counter-intuitive 'default' results, such as an increase of four vehicles on a road with an existing flow of three vehicles being classified as a 'large' change.

Nature of Effect

7.3.62 The nature of effects will be described as either:

- **Beneficial** – meaning that the changes produce benefits in terms of transport and access (such as reduction of traffic, travel time or patronage, or provision of a new service, access or facility); or
- **Adverse** – meaning that changes produce dis-benefits in terms of transport and access (such as increase of traffic, travel time, patronage or loss of service or facility); or

- **Neutral** – meaning that there is no discernible or perceptible change in terms of traffic and transport.

Scale of Effect

7.3.63 The scale of a likely effect will be derived by considering both the sensitivity of the receptor and the magnitude of impact, as demonstrated in **Table 7.3.5** below.

Table 7.3.5: Scale of Effect

Receptor Sensitivity	Magnitude of Impact			
	Substantial / Large	Moderate / Medium	Slight / Small	Negligible
High	Major	Major	Moderate / Minor	Negligible
Medium	Major	Moderate	Minor	Negligible
Low	Moderate / Minor	Minor	Minor	Negligible
Negligible	Negligible	Negligible	Negligible	Negligible

Geographic Extent of Effect

7.3.64 The geographic extent of the effects will be identified. At a spatial level, 'Sites' or 'local' effects are those affecting the Sites and neighbouring receptors, while effects upon receptors in the LBC and surrounding boroughs beyond the vicinity of the Sites and its neighbours are at a 'district / borough' level. Effects affecting Greater London are at a 'regional' level, whilst those which affect different parts of the country, or England, are considered being at a 'national' level.

Duration of Effect

7.3.65 For the purposes of the ES, effects that are generated as a result of the demolition and construction works (i.e. those that last for this set period of time) are 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 Proposed Development are classed as 'permanent' or 'long-term' effects.

Direct and Indirect, Reversible or Irreversible Effects

7.3.66 The assessment will also identify whether the effect is 'direct' (i.e. resulting without any intervening factors) or 'indirect' or 'secondary' (i.e. not directly caused or resulting from something else).

7.3.67 Whether the effect is 'reversible' or 'irreversible' will also be identified.

Categorising Likely Significant Effects

7.3.68 In terms of effect significance, moderate and major effects are considered to be 'significant'. Effects that are minor and negligible are not significant.

7.4 Air Quality

Summary of Baseline Conditions and Anticipated Sensitive Receptors

7.4.1 Different study areas will be adopted for each potential air quality effect, as outlined below.

Assessment of Dust from Demolition and Construction Related Activities

7.4.2 The air quality – dust study area has been informed by the screening criteria for determining when a dust assessment is required cited in the Institute of Air Quality Management (IAQM) 2024 guidance[38]. The dust study area will be 250 m around the project boundary, accounting for impacts from demolition, earthworks and construction. The study area will also include areas up to 50 m from roads within 250 m either side of any Site exits to account for dust impacts generated from trackout.

Assessment of Air Quality due to Demolition and Construction and Operational Phase Traffic

7.4.3 Where dispersion modelling is undertaken in relation to demolition and construction vehicles emission dispersion modelling, the study area will include receptors within 200 m of roads which would experience the greatest increase in vehicle movements that is expected.

7.4.4 Some additional or different areas may also be modelled for the baseline (model verification) scenario, including roads within 200 m of the monitoring locations. The monitoring locations will be determined once the study areas for the demolition and construction effects have been finalised and their suitability for use in model verification has been checked.

[38] Institute of Air Quality Management, 2024. Guidance on the assessment of dust from demolition and construction (Version 2.2).

7.4.5 Ecological receptors (i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites, Sites of Special Scientific Interest (SSSIs), National nature Reserves, Local Nature Reserves, Ancient Woodland and Sites of Importance for Nature Conservation (SINCs) will be included in the dispersion model where they cannot be scoped out, using the criteria below.

- Distance screen: Ecological sites more than 200 m from any roads for which Proposed Development traffic data are available will be excluded;
- Habitat sensitivity screen: Habitats known not to be sensitive to NOx, NH_3 or nutrient deposition will be excluded, as will sites where background concentrations of pollutants are already in excess of critical loads or levels representing site suitability;
- Spatial distribution of features screen: Unless sensitive habitats or species which are sensitive to pollution are located within 200 m of any roads, the habitats will be excluded; and
- Effects of the Proposed Development: The habitat will only be considered where the Proposed Development and cumulative schemes introduce over 1,000 additional vehicles (expressed as an AADT) to roads within 200 m of the relevant components of the habitat.

7.4.6 The project's Transport Consultant has advised that the Proposed Development is anticipated to generate 80-100 daily vehicle movements, which is considerably less than the 450 daily vehicle movements from the existing Sites. As such, it is anticipated that operational phase vehicle movements (once the Proposed Development is complete and operational) will be screened out from further assessment. Therefore, a study area has not been defined.

Baseline Conditions

7.4.7 The Sites are located within the jurisdiction of the LBC. The whole borough has been declared as an Air Quality Management Area (AQMA) for exceedances of the annual mean nitrogen dioxide (NO_2) and 24-hour mean particulate matter (PM_{10}) air quality objectives (AQOs). These AQOs are derived from the Air Quality (England) Regulations 2000, as amended.

7.4.8 According to the most recent Air Quality Annual Status Report for LBC[39], there were twenty-six sites measuring for annual mean NO_2 concentrations within 0.5 km of the Sites during 2023, the latest year for which monitoring data are available.

[39] LBC, 2024. LBC Air Quality Annual Status Report for 2023.

7.4.9 The results of the monitoring data collected from 2017 to 2023 at the LBC monitoring locations are shown in **Table 7.4.1**, below. This excludes monitoring data for the years 2020 and 2021, which have not been considered due to the likely effects of the Covid-19 pandemic on pollutant concentrations.

7.4.10 **Table 7.4.1** shows that during 2023, annual mean NO_2 concentrations did not breach the AQO at any of the monitoring location situated in proximity to the Sites. However, the AQO has historically been breached at monitoring location CAM84 in previous years.

Table 7.4.1: Annual Mean NO2 Concentrations at Diffusion Tube Monitoring Locations within 0.5 km of the Proposed Development (µg/m³)

Site ID	Site Type	Distance from Sites (m)	Annual mean NO_2 concentrations (µg/m³)				
			2017	2018	2019	2022	2023
CAM254	Roadside	138	-	-	-	21.5	21.01
CAM308	Roadside	157	-	-	-	25.07	28.31
CAM255	Roadside	164	-	-	-	19.95	19.05
CAM253	Roadside	177	-	-	-	21	17.09
CAM110	Roadside	187	-	-	31.26	20.51	24.39
CAM106	Roadside	207	-	-	30.49	18.93	21.65
CAM256	Roadside	210	-	-	-	19.86	19.13
CAM307	Roadside	217	-	-	-	26.59	30.33
CAM143	Roadside	232	-	-	-	24.76	28.48
CAM144	Roadside	240	-	-	-	-	32.03
CAM107	Roadside	244	-	-	29.02	19.52	22.50
CAM163	Roadside	326	-	-	-	22.77	24.21
CAM165	Roadside	347	-	-	-	26.48	29.90
CAM142	Roadside	353	-	-	-	25.39	32.29
CAM90	Roadside	355	-	-	32.25	22.57	22.41
CAM148	Roadside	373	-	-	-	31.92	34.80
CAM164	Roadside	382	-	-	-	24.48	28.84
CAM108	Roadside	396	-	-	29.46	19.29	22.59
CAM145	Roadside	443	-	-	-	26.39	28.97
CAM109	Roadside	456	-	-	31.17	20.16	25.78
CAM146	Roadside	460	-	-	-	21.53	26.24
CAM84	Kerbside	470	**69.30**	**55.57**	**53.69**	38.08	36.49
CAM329	Roadside	470	-	-	-	27.34	27.34
CAM147	Roadside	471	-	-	-	29.04	32.34
CAM257	Roadside	484	-	-	-	23.59	24.36

Site ID	Site Type	Distance from Sites (m)	Annual mean NO_2 concentrations ($\mu g/m^3$)				
			2017	2018	2019	2022	2023
CAM291	Roadside	494	-	-	-	20.76	20.54

7.4.11 The monitoring locations most representative of the Sites are diffusion tubes CAM254 (Canal Location 2 - Belsize Primary School) and CAM308 (Agar Grove westbound), which are located within approximately 150 m of the Site A boundary. These monitoring locations did not monitor an exceedance in the AQO for any of the years of available monitoring data.

7.4.12 As well as passive monitoring for NO_2, LBC also undertake automatic (continuous) monitoring for hourly mean NO_2, PM_{10} and $PM_{2.5}$ concentrations at five locations within its jurisdiction. Of these five automatic monitoring locations, two are located within 1 km of the Sites (CD010 – Camden High Street and KGX - Coopers Lane). From 2017 to 2023, the annual mean PM_{10}, 24-hour mean PM_{10} and annual mean $PM_{2.5}$ AQOs have not been breached at either of these two monitoring locations.

7.4.13 The London Atmospheric Emissions Inventory (LAEI)[40] provides estimated concentrations of key pollutants NO_x, NO_2, PM_{10} and $PM_{2.5}$ across Greater London for year 2025, using an atmospheric dispersion model. Following a review of the LAEI modelled concentrations for NO2, the $20m^2$ grids at the location where the highest concentration was recorded within both Sites ranged between approximately 24 - 26 $\mu g/m^3$ and were below the annual mean AQOs at all areas within the Site for NO_2, PM_{10} and $PM_{2.5}$. **Table 7.4.2** presents LAEI concentrations for 2025 corresponding to the worst-case locations within the Sites' boundaries.

Table 7.4.2: 2025 Modelled Pollution Levels at the Sites, taken from the LAEI ($\mu g/m^3$)

Pollutant	529655, 184136 (Site A)	529708, 183912 (Site B)	Objective
NO_2	26.1	24.8	40
PM_{10}	16.9	17.2	40
$PM_{2.5}$	10.5	10.5	20

[40] London Atmospheric Emissions Inventory, 2021. Annual Pollution Maps. Kings College London on behalf of Greater London Authority.

7.4.14 Estimated background data are available from the United Kingdom Air Information Resource website[41] operated by Defra. The website provides estimated annual average background concentrations of NO_2, PM_{10} and $PM_{2.5}$ on a 1 km^2 grid basis.

7.4.15 **Table 7.4.3** presents estimated annual average background NO_2, PM_{10} and $PM_{2.5}$ concentrations for the grid square containing the Sites for 2023. The estimated background concentrations are well below the relevant UK Air Quality Objectives for NO_2, PM_{10} and $PM_{2.5}$. As background concentrations are predicted to fall with time, background concentrations in future years would not be expected to exceed their respective annual mean AQOs.

Table 7.4.3: Estimated Background Annual Average NO_2, PM_{10} and $PM_{2.5}$ Concentrations at the Sites

Assessment Year	Estimated Annual Average Pollutant Concentrations Derived from the UK-AIR Website		
	Annual Average NO_2 (µg/m^3)	Annual Average PM_{10} (µg/m^3)	Annual Average $PM_{2.5}$ (µg/m^3)
2023	23.00	17.14	9.27
Air Quality Objective	**40**	**40**	**20**

7.4.16 Based on the local authority monitoring, LAEI estimated concentrations and estimated background data presented above, it is considered that the Sites are located in an area where each of the AQOs will be complied with. Additionally, the annual mean concentrations of NO2 are projected to decrease with time as background air quality is projected to improve with time, as newer, cleaner vehicles are introduced into the vehicle fleet; therefore, breaches of AQOs are not expected in future years.

Sensitive Receptors

7.4.17 There are multiple receptors within the study area which may be affected by the Proposed Development during the demolition and construction and operational phases. These are described below.

- As a result of construction related activities, there are users of nearby buildings or amenity space, who may experience a loss of amenity due to dust soiling, or whose health may be affected as a result fugitive dust and pollutants such as NO_2 and PM_{10} generated by demolition and construction

[41] Department for Environment, Food & Rural Affairs (Defra), 2024. United Kingdom Air Information Resource (UK-AIR): Background Mapping data for local authorities – 2021.

related activities or non-road mobile machinery (NRMM, i.e., plant). The receptors in the vicinity of the Sites include (but are not limited to) commercial and residential properties along Camley Street and Wrotham Road.

- Emissions from additional vehicles attributable to the Proposed Development, whilst demolition and construction activities are ongoing. Dust generated as a result of 'trackout' from the Sites along the local road network may also affect amenity and exposure to PM10 along roads in the vicinity of the Sites, whilst demolition and construction is ongoing. This may include receptors along Camley Street, Wrotham Road and other sensitive residential receptors situated along Agar Grove, which runs east to west, to the north of Site A.
- Future occupants of the Proposed Development, which may be affected by poor ambient air quality. Impacts here may be exacerbated by emissions of pollutants such as NO_2, PM_{10} and $PM_{2.5}$ generated both by road traffic and any stationary combustion plant attributable to the Sites.

7.4.18 A search of the Multi-Agency Geographic Information for the Countryside (MAGIC) maps website operated by Natural England indicates that there is a designated Local Nature Reserve (Camley Street Nature Reserve) located approximately 450 m south-east of Site B. Site B is also located within the vicinity of the London's Canals SINC. Given that these ecological sites are located within 200 m from the likely affected road network, it is proposed to assess impacts on this ecologically sensitive receptor in relation to demolition and construction phase impacts on air quality, should the additional traffic generated by the Proposed Development exceed the screening criteria for detailed assessment.

7.4.19 Regarding the assessment of air quality effects, once traffic data is received, the Air Quality team will be able to determine specific sensitive receptor locations, based on where the potential impacts of Proposed Development generated emissions are likely to be.

Key Issues and Potential Likely Impacts Identified

Demolition and Construction Phase

7.4.20 During the demolition and construction phase, demolition and construction activities have the potential to generate fugitive dust emissions which may impact vascular plant species and give rise to annoyance due to the soiling of surfaces. Emissions of this nature can also pose a risk of human health effects due to the increase in exposure to PM_{10} concentrations.

7.4.21 Emissions from traffic and plant generated and used in connection with the proposed demolition and construction activities may also affect ambient air quality at and around the Sites.

Operational Phase

7.4.22 Emissions from car parks and combustion plant (if present) associated with the Proposed Development during the operational phase may affect local air quality. In addition, future users / residents of the Proposed Development may be impacted by existing local air quality, including contributions from road traffic emissions.

Assessment Methodology

Determination of Baseline

7.4.23 In order to determine the baseline conditions, the requirements of national, regional, and local planning policy in relation to air quality, including the NPPF, London Plan and Camden Local Plan 2016 – 2031 (Adopted July 2017), will be reviewed.

7.4.24 Publicly available sources of data will also be reviewed to characterise baseline ambient air quality at and around the Sites, including air quality monitoring undertaken by LBC and neighbouring Boroughs, the Defra background maps and estimated LAEI baseline concentrations.

Prediction Methodology

Demolition and Construction Phase

7.4.25 A qualitative dust risk assessment for the construction phase of the Proposed Development will be undertaken, in line with the Greater London Authority's (GLA's) The Control of Dust and Emissions during Construction and Demolition (2014) supplementary planning guidance and the IAQM 'Guidance on the assessment of dust from demolition and construction (Version 2.2)' (2024). This will provide an assessment of the likely impacts of dust from the various stages of demolition and construction at selected representative receptor locations within 250 m of the redline boundaries and within 50 m of the route(s) used by demolition and construction vehicles on the public highway, up to 250 m from the Sites' exit). These receptor locations will include, as appropriate, receptors at nearby committed and consented development sites.

7.4.26 Demolition and construction phase traffic data for the Proposed Development will be screened against both the criteria in the 'Camden Planning Guidance Air quality' (LBC, 2021; the CPG) and the Land-Use Planning & Development Control: Planning for Air Quality guidance (Environmental Protection UK and

the IAQM, 2017) ('the EPUK-IAQM guidance'). The EPUK-IAQM guidance suggests a detailed air quality assessment is required when:

- The change in light duty vehicle (LDV) flows is greater than 100 annual average daily traffic (AADT) within or adjacent to an Air Quality Management Area (AQMA) or greater than 500 AADT elsewhere; or
- The change in heavy duty vehicle (HDV) flows is greater than 25 AADT within or adjacent to an AQMA or greater than 100 AADT elsewhere.

7.4.27 Where the Proposed Development is phased, demolition and construction traffic will be combined with the operational phase traffic data to determine the year during which traffic volumes and thus emissions would be highest. Where, in any given year during which demolition and construction activities take place, one or both of these thresholds are exceeded, it is proposed to quantify the effects that this additional traffic may have on air quality using the ADMS-Roads dispersion modelling software. The study area will be determined by the locations breaching the screening criteria and the availability of traffic data.

7.4.28 Where one or more of the EPUK-IAQM guidance screening criteria are exceeded (in relation to demolition and construction vehicle movements) and where demolition and construction may take place for at least one year, it is also proposed to model the impact of vehicle movements on air quality for the following three scenarios:

- 'Base case' (verification) scenario (year to be confirmed, but likely to be 2023 or 2024);
- 'Peak demolition and construction year without development', for the year during which the largest volume of demolition and construction traffic attributable to the Proposed Development (or alternatively demolition and construction and operational traffic combined, where the development Proposed Development is phased) will be generated, inclusive of future baseline and traffic from nearby committed and consented developments (if data are available) but without the Proposed Development in place; and,
- 'Peak demolition construction year with development': the year during which the largest volume of demolition and construction traffic attributable to the Proposed Development (or alternatively demolition and construction and operational traffic combined, where the Proposed Development is phased) will be generated, inclusive of future baseline, traffic from nearby committed and consented developments (if data are available) and Proposed Development traffic.

7.4.29 For ecological receptors, the demolition and construction traffic generated by the Proposed Development will introduce also be screened against the relevant criteria, as outlined in paragraph 7.4.26.

7.4.30 Where the effects of demolition and construction traffic on air quality can be screened out, a qualitative assessment detailing findings from the screening exercise will be undertaken.

7.4.31 Further details regarding the approach to dispersion modelling are provided under the 'Operational Phase' section below.

Operational Phase

7.4.32 The potential impacts of the Proposed Development on local air quality (from increased concentrations of NO_2, PM_{10} and $PM_{2.5}$), will initially be screened against all criteria in the EPUK-IAQM guidance (including those relating to on-site car parking and stationary combustion sources).

7.4.33 The impact of ambient air quality on future Site users will be assessed using the ADMS-Roads 5 dispersion modelling software.

7.4.34 It is proposed to model the following scenarios:

- Base case scenario (identical to the base case scenario described under the 'Construction' heading above);
- 'Without development' (only where impacts at existing receptors are not screened out): future baseline traffic during the year in which the Proposed Development is expected to be fully operational, without the Proposed Development in place but inclusive of committed and consented schemes; and,
- 'With development': future baseline traffic during the year in which the Proposed Development is expected to be fully operational, with the Proposed Development in place and any committed and consented schemes. Three different 'with development' scenarios will be modelled to account for the impacts from Site A in isolation, Site B in isolation and both Sites A and B.

7.4.35 Where modelled, potential effects will be considered at representative locations where people might experience a change in local air quality in the vicinity of roads where the Proposed Development is expected to introduce potentially significant volumes of additional traffic (when reviewed against the EPUK-IAQM guidance screening criteria) for which traffic data are made available.

7.4.36 Emission factors from the Defra Emissions Factors Toolkit (current at the time) will be used in the assessment. It is proposed to use emissions factors and background pollutant concentrations appropriate to the years being assessed. This is considered appropriate, noting that both vehicle emissions factors and monitored pollutant concentrations (shown in **Table 7.4.1**) dropping between 2019 and 2023.

7.4.37 Where the Proposed Development is phased, the emissions factors applicable to the first opening year may be used with final year traffic data, to ensure Site suitability is acceptable for all Proposed Development phases.

7.4.38 The assessment will include model verification against local monitoring data at a reasonably representative selection of local monitoring locations, including monitoring locations referenced in the 'Local Air Quality Management Technical Guidance 2022' (Defra, 2022) ('TG22').

7.4.39 Where required, the changes in concentration between comparable 'without development' and 'with development' scenarios for annual mean NO_2, PM_{10} and $PM_{2.5}$ will be undertaken with reference to the AQOs. The impact magnitude will be assessed with reference to the descriptors provided in the EPUK-IAQM guidance. Professional judgement will be exercised to determine the overall significance of effects, based on the impact magnitudes assigned and the number of additional receptors which are exposed to concentrations exceeding an AQO where they were not predicted to without the development in place.

7.4.40 One year of meteorological monitoring data from a nearby representative monitoring station, such as London City, will be used. The year selected will match the base year selected.

7.4.41 The modelling will account for buildings and street canyons as appropriate.

7.4.42 If included as part of the Proposed Development, underground car parks with extraction systems, will be assessed (modelled using the ADMS dispersion model) if the ventilation extract is within 20 m of a relevant receptor, and where the car park has more than 100 movements per day (total in and out). Backup generators and any plant will also be assessed qualitatively and quantitatively if necessary.

7.4.43 An air quality neutral assessment will be undertaken.

7.4.44 It is also proposed to produce an Air Quality Positive statement in support of the proposed development, in accordance with the latest version of the 'London Plan Guidance: Air Quality Positive' (Mayor of London, 2023). The statement will be submitted as a standalone document, separate from the Environmental Statement, but will also be appended to the Air Quality Chapter of the Environmental Statement and will consider the potential impact on amenity from the cement batching plant situated to the east of Site B.

Mitigation Recommendations

7.4.45 Following the findings of the assessment, high-level recommendations, if appropriate, for mitigation of the potential impacts that the Proposed Development may have on local air quality and / or to prevent the risk of new exposure to poor air quality at the Sites will be provided.

Cumulative Effects

7.4.46 As appropriate, the qualitative dust risk and air quality modelling assessments will consider the combined impacts from the Sites with other adjacent committed and consented sites on air quality at existing receptor locations. Where new receptors may be significantly affected by activities attributable to demolition and construction related activities, vehicular traffic or stationary combustion sources connected with the Proposed Development (whilst undergoing demolition and construction or once operational), impacts at these receptors will also be assessed.

7.4.47 It is initially proposed that the dispersion modelling assessment will consider the cumulative impact from both Sites together, unless a decision is made to develop only one parcel of land. This will allow for a worst-case assessment at both locations.

7.5 Noise and Vibration

Summary of Baseline Conditions and Anticipated Sensitive Receptors

7.5.1 Baseline noise surveys were undertaken between 9th January to 13th January 2025. The results of the surveys are still being processed; however, it is expected that the Sites and nearest sensitive receptors are currently exposed to noise from the following sources:

- Road Traffic noise from Agar Grove, Wrotham Road, Camley Street, Murray Street, St Augustine's Road;
- Rail noise from the North London Line (overground), and railway lines into and out of St Pancras Station;
- Industrial noise from the Heidelberg Materials Ready-mixed Concrete facility, located adjacent (to the south-east) of Site B; and
- Operational noise from warehouses south of Site B.

7.5.2 The identified noise sensitive receptors are outlined in **Table 7.5.1** below and are shown in **Figure 7.5.1**.

Table 7.5.1: Noise Sensitive Receptors

Receptor ID	Receptor	Type
R1	Dwellings on Camley Street, Weavers Way and Barker Drive	Residential
R2	Dwellings on Camley Street, Crofters Way and Ploughmans Close	Residential

Receptor ID	Receptor	Type
R3	Dwellings on Camley Street and Crofters Way	Residential
R4	Dwellings on Barker Drive, Weavers Way, Ploughmans Close, Crofters Way and Reapers Close	Residential
R5	Dwellings on Wrotham Road	Residential
R6	28 and 30 Agar Grove	Residential
R7	Dwellings on Agar Grove, Murray Street and St Augustine's Road	Residential
R8	Dwellings on Agar Grove and St Pauls Crescent	Residential
R9	Maiden Lane Community, dwellings on Agar Grove and St Pauls Crescent	Residential
R10	Abacus Belsize Primary School	Non-residential
R11	Agar Children's Centre (Nursery)	Non-residential

Key Issues and Potential Likely Impacts Identified

Demolition and Construction Phase

7.5.3 There is potential for impacts to arise from the following:

- Noise and vibration from demolition and construction activities on surrounding residential receptors; and
- Increase in off-Site road traffic noise from demolition and construction traffic on residential and non-residential receptors adjacent to traffic routes.

Operational Phase

7.5.4 There is potential for impacts to arise from the following:

- Operational noise associated with the Proposed Development, including noise from mechanical plant, on surrounding residential receptors; and
- Exposure of new noise sensitive receptors introduced as part of the Proposed Development to local noise and vibration sources, such as transportation (road and rail) and industrial noise.

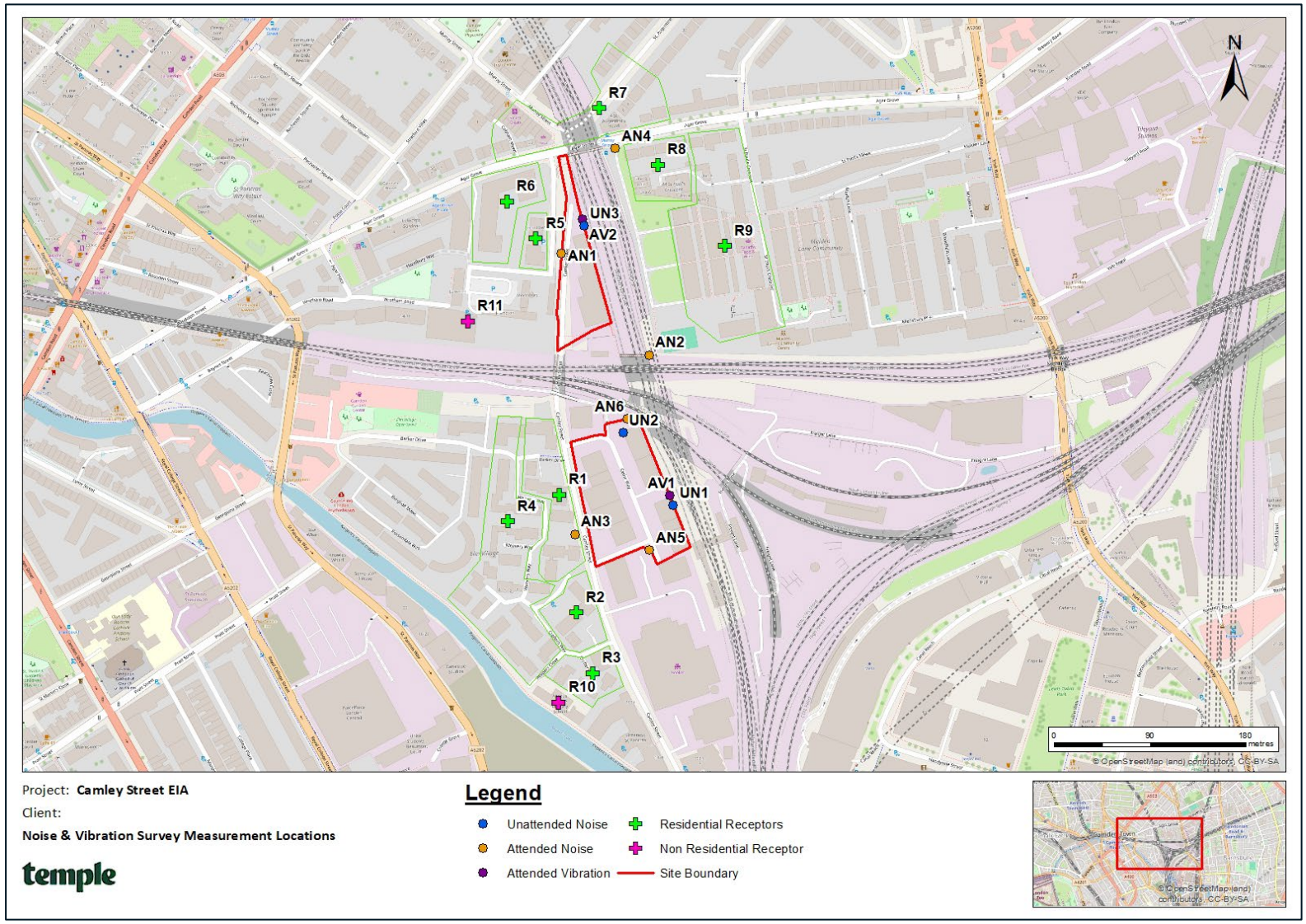
7.5.5 As previously mentioned, the project's Transport Consultant has advised that the Proposed Development is anticipated to generate 80-100 daily vehicle movements, which is considerably less than the 450 daily vehicle movements from the existing Sites. Therefore, it is considered unlikely that there will be an increase in road traffic noise from operational traffic.

Assessment Methodology

Determination of Baseline

7.5.6 Baseline noise and vibration levels at the most exposed areas of the Proposed Development and at receptors were measured using class 1 equipment and in line with relevant standards and guidance. The locations monitored during the survey are illustrated in **Figure 7.5.1**.

Figure 7.5.1: Proposed Survey Locations and Identified Noise Sensitive Receptors



Prediction Methodology

7.5.7 The following impact assessments will be carried out:

- Demolition and construction noise and vibration assessment undertaken using methodologies from BS 5228[42].
- Demolition and construction road traffic noise assessment calculated using Calculation of Road Traffic Noise[43] and assessed against Design Manual for Roads and Bridges[44] short term impact criteria.
- Operational plant and industrial noise assessment undertaken in accordance with BS 4142[45] and the Camden Local Plan[46]. (It is likely that operational plant and industrial use information will not be known at the time of the assessment, therefore, operational noise limits at 1m from the nearest (or worst affected) noise sensitive receptors will be proposed).
- The Site suitability assessment for noise sensitive uses will be assessed, based on the predicted and / or measured noise exposure from local noise sources, including road traffic noise from Agar Grove, Wrotham Road, Camley Street, rail noise from the North London Line (overground), railway lines into and out of St Pancras Station, and industrial noise from nearby concrete facilities. Propagation calculations and / or modelling will be used alongside the project architects' drawings to predict external noise levels at the proposed building facades, where required. The assessment will be based on comparing the predicted / measured levels with guideline levels from BS 8233[47], the World Health Organisation (WHO) guidelines[48], Approved Document O[49] and the Camden Local Plan.
- The Site suitability assessment for vibration sensitive uses will be assessed, based on measured vibration exposure from the railway lines running

[42] British Standard 5228-1: 2009 + A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise and Part 2: Vibration

[43] Calculation of Road Traffic Noise, Department of Transport Welsh Office, HMSO, 1988

[44] Design Manual for Roads and Bridges, Volume 11, Environmental Assessment, Section 3, Environmental Assessment Techniques, LA 111, Noise and Vibration, (formerly HD 213/11, IAN 185/15), Highways England, May 2020

[45] British Standard 4142: 2014 Methods for rating and assessing industrial and commercial sound'.

[46] Camden Local Plan (2017). London Borough of Camden

[47] British Standard 8233: 2014 'Guidance on Sound Insulation and Noise Reduction for Buildings', BSI, London.

[48] World Health Organisation (1995), WHO Guidelines for Community Noise.

[49] Acoustics Ventilation and Overheating: Residential Design Guide, January 2020, Version 1.1

adjacent to both Site A and Site B into St Pancras Station. The assessment will be based on comparing the measured vibration exposure with guideline levels in BS 6472[50] and the Camden Local Plan.

7.5.8 Given that the Proposed Development is anticipated to generate 80-100 daily vehicle movements, which is considerably less than the 450 daily vehicle movements from the existing Site, it is proposed to scope out an assessment of operational road traffic noise.

Cumulative Effects

7.5.9 The potential effect of cumulative demolition and construction noise or operational plant noise from surrounding committed developments will be considered.

7.5.10 Future development traffic flows assessed for the operational road traffic noise assessment will include committed development traffic.

7.6 Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare

Summary of Baseline Conditions and Anticipated Sensitive Receptors

Preliminary Baseline Conditions

7.6.1 The existing Sites are relatively under-developed, comprising of low-rise industrial units and surface car parking. The neighbouring sensitive receptors detailed below overlook this existing context and will, therefore, likely enjoy relatively high levels of daylight and sunlight and relatively limited overshadowing (subject to orientation) in the existing condition.

Anticipated Sensitive Receptors

7.6.2 The anticipated sensitive receptors to be included within the assessment include:

1. 1-4 Springbank Walk;
2. 5-12 Springbank Walk;
3. 13-20 Springbank Walk;
4. Unit 6, 44 St Pauls Crescent;

[50] British Standard 6472-1: 2008 Guide to evaluation of human exposure to vibration in buildings, Part 1: Vibration sources other than blasting

5. Flat 6A, 44 St Pauls Crescent;
6. Flat 6B, 44 St Pauls Crescent;
7. Unit 7, 44 St Pauls Crescent;
8. Unit 8, 44 St Pauls Crescent;
9. Flats A-M Ferndown;
10. 1-3 Cranbourne;
11. 49-63 (Odd) Crofters Way;
12. 65-79 (Odd) Crofters Way;
13. 81-87 (Odd) Crofters Way;
14. 65-87 Weavers Way;
15. 89-111 Weavers Way;
16. 113-127 Weavers Way;
17. 26 Weavers Way;
18. 57-63 Weavers Way;
19. 33-55 Weavers Way;
20. 17-31 Weavers Way;
21. 139-153 Barker Drive;
22. 1-15 Weavers Way;
23. 123-137 Barker Drive;
24. 216-230 Barker Drive;
25. 232-246 Barker Drive;
26. Agar Grove, Consented Block B;
27. Agar Grove, Consented Blocks C, D and E;
28. Agar Grove, Consented Blocks J, K and L;
29. 21 Agar Grove;
30. 23 Agar Grove; and
31. 25 Agar Grove.

Key Issues and Potential Likely Impacts Identified

Demolition and Construction Phase

7.6.3 During the demolition and construction phase, the potential daylight, sunlight, overshadowing, solar glare and light pollution impacts would vary throughout the Site preparation, demolition and construction, and gradually increase to the potential effects identified for the completed Proposed Development. It is, therefore, considered that the operational phase (i.e., completed Proposed Development) represents the likely overall worst-case assessment in terms of

likely effects. On this basis, it is proposed to scope out the demolition and construction phase assessment. However, it should be noted that in some rare situations, it is possible that the solar glare effects from individual blocks within earlier phases of a phased development may be more pronounced when compared to their effects as part of the completed development. This can occur when earlier phases are not obscured or shielded by blocks from later phases, leaving their façades more exposed and, therefore, more susceptible to glare effects.

Operational Phase

7.6.4 The Proposed Development's new built form has the potential to result in significant daylight, sunlight, overshadowing, solar glare and light pollution effects at sensitive receptors during the operational phase. The assessment will, therefore, consider where effects to sensitive receptors would occur.

Assessment Methodology

Relevant Policy, Legislation and Guidance

7.6.5 The daylight, sunlight, overshadowing, solar glare and light pollution assessments will be carried out using the assessment methodologies recommended in:

- 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (BR209, 2022 edition) published by the Building Research Establishment. Professional Guidance Note, 'Daylighting and sunlighting' (1st edition, 2012), published by the Royal Institution of Chartered Surveyors (reissued in October 2023 as a RICS professional standard).
- The Institution of Lighting Professional publication 'Guidance Notes for the Reduction of Obtrusive Light (GN01:2011)'.
- BRE Guidelines CIE 146:2002, 'CIE Equations for Disability Glare' published by Commission Internationale l'Eclairage.
- BR Information Paper 3/87 Solar dazzle reflected from sloping glazed facades (1987).

7.6.6 The following policy and legislation will also inform the assessment reported in the ES:

- National Planning Policy Framework (December 2024);
- National Design Guide (January 2021);
- The London Plan (March 2021);
- Housing Design Standards LPG (June 2023);
- Camden Local Plan (2017);

- Camden Planning Guidance on Amenity (2021); and,
- Camden Planning Guidance on Housing (2021).

Determination of Baseline

7.6.7 The baseline condition for the daylight, sunlight and overshadowing assessments will comprise any existing buildings on the Sites at the time of the baseline assessment. Baseline conditions will be assessed and analysed through the use of 3D modelling and computer simulation.

7.6.8 The 3D model of the existing Sites and relevant neighbouring buildings will be based upon indicative photogrammetry data and Site photography, further enhanced by 3D measured survey data, where possible and appropriate.

7.6.9 For the baseline, the daylight and sunlight conditions within each of the relevant surrounding sensitive receptors will be defined under the existing Site conditions by reference to the Vertical Sky Component ('VSC'), No Sky Line ('NSL') and Annual Probable Sunlight Hours ('APSH') methods, in accordance with the advice and recommendations set out in 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (BR209, 2022 edition) published by the Building Research Establishment ('BRE Guidelines 2022').

7.6.10 With regards to the relevant existing surrounding outdoor amenity areas and the baseline level of overshadowing, the transient overshadowing ('TOS') and sun hours on ground ('SHOG') methodology will be used, in accordance with the BRE Guidelines 2022.

7.6.11 The solar glare assessments from nearby railway line points and major road junctions near to the Sites will be undertaken to understand the potential and occurrence of solar glare at test points throughout the course of the year. The assessment will consider the assessment methodology recommended in the BRE Guidelines 2022 and BR Information Paper IP 3/87 Solar dazzle reflected from sloping glazed facades (1987). It should be noted that the consideration of solar glare is not a comparative assessment; therefore, the presence of solar glare in the baseline does not justify the occurrence of glare as a result of a proposed development. Accordingly, any assessment focuses on the potential impact and resultant effects of a proposed development in relation to solar glare in absolute terms and not against a baseline condition.

7.6.12 In relation to artificial light pollution, depending on the detailed design for the Proposed Development, there may be a requirement to consider the light pollution effect upon neighbouring sensitive receptors. Any assessment will consider the Institution of Light Professional guidance documents GN01-21 (2021). It should be noted that the consideration of artificial light pollution is not a comparative assessment; therefore, the presence of light pollution in the baseline does not justify the occurrence of light pollution as a result of a

proposed development. Accordingly, any assessment focuses on the potential impact and resultant effects of a proposed development in relation to light pollution in absolute terms and not against a baseline condition.

Site Survey and Desk Based Assessment

7.6.13 The daylight, sunlight and overshadowing effects of the Proposed Development will be assessed against the baseline condition.

7.6.14 The baseline conditions will be established based on the following:

- Indicative photogrammetry data of the existing Sites and neighbouring properties;
- Site photography of the neighbouring properties included within the scope of the assessments;
- 3D measured survey data for neighbouring properties, where this can be captured based upon access etc. and where deemed necessary; and
- Research of the LBC's planning portal and other online sources to obtain internal layout information for the neighbouring properties, where available.

7.6.15 As previously mentioned, light pollution and solar glare assessments are not comparative analyses against a baseline. However, the 3D modelling source data referenced above will be utilised for assessments, focusing solely on light pollution and solar glare under the proposed conditions.

Limitations

7.6.16 In the absence of internal layout information for the properties assessed, reasonable assumptions will be made within the computer modelling undertaken, as per industry practice. These assumptions may include modelling elements such as floor levels, wall thicknesses, room uses etc.

7.6.17 The 3D model that will be used to produce the daylight, sunlight, overshadowing, solar glare, and light pollution assessments is inherently indicative. This is due to its reliance on the source information described above, which will also be detailed in the ES chapter. The ES chapter will provide a comprehensive account of the assumptions, limitations, and methodologies applied to each of these assessments.

7.6.18 It is important to emphasise that computer simulations, such as those employed in these assessments, are representations rather than real-world conditions. By their very nature, they are approximations designed to provide insights based on the available data and agreed-upon methodologies. While they serve as powerful tools for analysis, they should be interpreted as

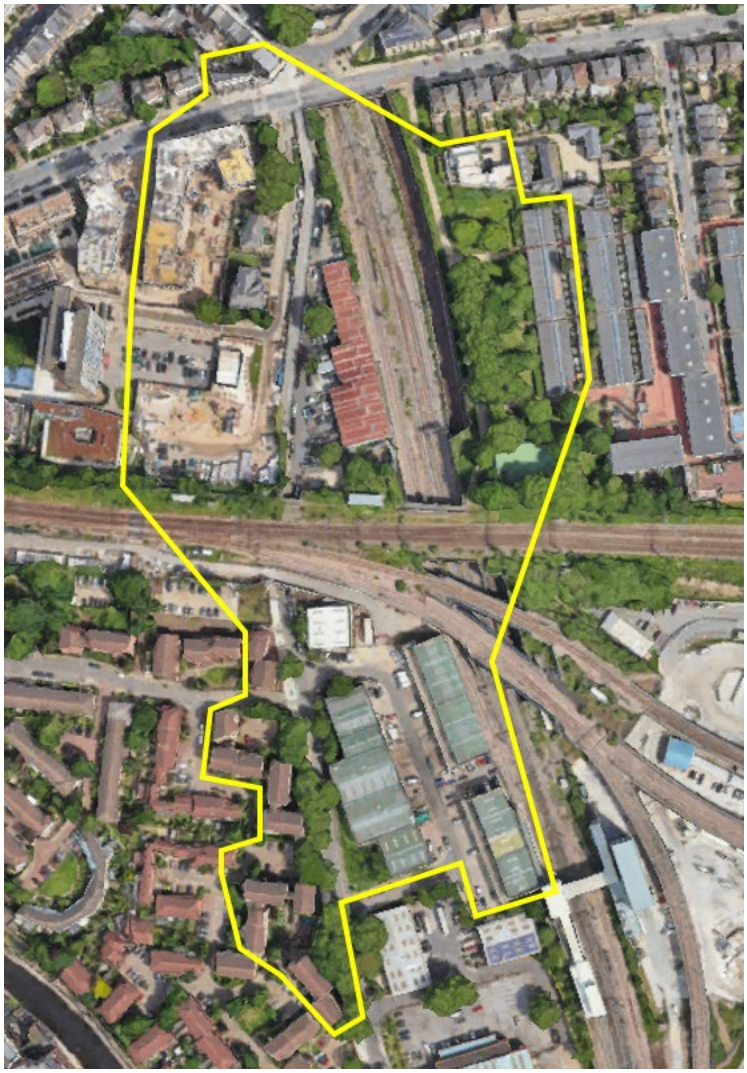
indicative rather than definitive, with their inherent assumptions and constraints clearly understood.

Assessment Scope

Daylight, Sunlight and Overshadowing

7.6.19 The anticipated scope of the neighbouring properties to be included within the respective assessments is highlighted in yellow in **Figure 7.6.1** below and as previously listed in the 'Preliminary Baseline Conditions' section.

Figure 7.6.1: Assessment Area Scope



7.6.20 It should be noted that the assessment scope area highlighted in yellow in **Figure 7.6.1** is subject to change and will be altered based on the Proposed Development and professional judgment, as and when further information becomes available (for example, the overall form and massing of the Proposed Development).

7.6.21 Only properties containing residential use or other known sensitive uses located within this area will be considered with the respective assessments.

Light Pollution

7.6.22 The identification of potential relevant neighbouring receptors will be undertaken once detailed information on the Proposed Development's design is available. However, as this assessment is anticipated to focus solely on the commercial elements of the Proposed Development, rather than any residential components, it is expected that there will be few, if any, receptors due to the distance of the Proposed Development's commercial block from potential neighbouring properties.

Solar Glare

7.6.23 The selection of relevant receptors for the solar glare assessment will depend on the detailed design of the Proposed Development. Receptor locations will be appropriately identified when detailed information on the Proposed Development, including the treatment of the elevations, becomes available. At this stage, it is anticipated that receptor locations are likely to be limited to those along the railway corridor.

Future Baseline

7.6.24 The baseline conditions would be unlikely to change in the future and, therefore, the assessment will be undertaken against the existing baseline.

7.6.25 Although no future baseline scenario will be considered within the assessments, the consented Agar Grove Development (planning reference: 2013/8088/P, as amended by planning reference 2020/0468/P) will be included within the existing baseline as a sensitive receptor, given that this development is nearing completion.

7.6.26 At this point in time, it is considered that there are no other neighbouring consented developments that would need to be considered as part of the future baseline or cumulative scenario assessment.

Assessment Scenarios

7.6.27 The following assessment scenarios are relevant to this topic:

- Existing Baseline (including Agar Grove Development);
- Existing Baseline (including Agar Grove Development) + Proposed Development (Site A & Site B);
- Existing Baseline (including Agar Grove Development) + Proposed Development (Site A only); and
- Existing Baseline (including Agar Grove Development) + Proposed Development (Site B Only).

Assessment Criteria

7.6.28 The criteria that will be used to assess if an effect is significant or not, is set out in the subsequent sub-sections. This will be determined by considering the sensitivity of the receptor, magnitude of impact and scale of the effect.

Sensitivity of Receptor

7.6.29 The criteria that will be used to assess the sensitivity of receptors is provided in **Table 7.6.1**.

Table 7.6.1: Sensitivity of Receptor

Sensitivity	Receptor
High	Residential properties / gardens / public open spaces e.g. parks railway signals and major road junctions with traffic lights
Medium	Schools / hospitals / religious buildings / transient accommodation e.g. hotels, student accommodation
Low	Commercial

Magnitude of Impact

7.6.30 A scale and significance of the completed Proposed Development's effects will be determined with reference to BRE Guidelines and / or as per usual industry standards.

7.6.31 The criteria that will be used to assess the magnitude of an impact is provided in the below tables.

Table 7.6.2: VSC Criteria

Scale of Effect	Numerical Criteria – Daylight (VSC) – Magnitude of Change / Impact
High	Relative reduction above 40% VSC
Medium	Relative reduction between 30% and 39.99% VSC
Low	Relative reduction between 20.1% and 29.99% VSC
Negligible	>27% retained VSC and/or relative reduction < 20% VSC

Table 7.6.3: NSL Criteria

Scale of Effect	Numerical Criteria – Daylight (NSL) – Magnitude of Change / Impact
High	Relative reduction above 40% NSL

Scale of Effect	Numerical Criteria – Daylight (NSL) – Magnitude of Change / Impact
Medium	Relative reduction between 30% and 39.99% NSL
Low	Relative reduction between 20.1% and 29.99% NSL
Negligible	Relative reduction < 20% NSL

Table 7.6.4: APSH Criteria

Scale of Effect	Numerical Criteria – Sunlight (APSH) – Magnitude of Change / Impact
High	Relative reduction above 40% APSH
Medium	Relative reduction between 30% and 39.99% APSH
Low	Relative reduction between 20.1% and 29.99% APSH
Negligible	>25% annual APSH retained, of which >5% during winter months; and/or relative reduction <20% APSH; and/or absolute reduction <4% APSH annually

Table 7.6.5: SHOG Criteria

Scale of Effect	Numerical Criteria – Overshadowing (SHOG) – Magnitude of Change / Impact
High	Relative reduction above 40%
Medium	Relative reduction between 30% and 39.99%
Low	Relative reduction between 20.1% and 29.99%
Negligible	>50% retained SHOG and/or relative reduction < 20%

7.6.32 Based on professional judgement, effects of a moderate or major scale are considered significant in EIA terms.

7.6.33 The numerical values quoted in the BRE Guidelines are purely advisory. When determining the scale and effect to each property in consideration of any impacts, judgement should be applied to assign the likely effect scale / significance based on all evidence available.

7.6.34 Where there are low levels of existing obstruction and planning aspirations for increased levels of development, greater effects on daylight and sunlight may be inevitable. This does not mean that retained light levels will necessarily be unacceptable, or out of character, with prevailing levels experienced around such development and across London.

7.6.35 Therefore, professional judgement will be used to determine the scale and significance of effects. When assigning the scale of an effect to each property in relation to daylight and sunlight, consideration will be given to:

- The number of rooms and / windows affected;
- The nature of room uses affected (bedrooms, kitchens, or living rooms);
- The percentage alterations to daylight levels (very low existing levels of VSC, NSL or APSH can result in large percentage changes that may not result in perceptible changes of light);
- The absolute changes to daylight and sunlight levels;
- Existing daylight and sunlight levels;
- Retained daylight and sunlight levels;
- Window orientation; and
- The presence of balconies, overhangs or other existing design features.

Transient Overshadowing

7.6.36 For transient overshadowing, the BRE Guidelines do not include numerical criteria for consideration and simply state that it may be helpful to plot shadow plans of the existing and proposed buildings to graphically illustrate the difference in the shadows cast.

7.6.37 Therefore, the results of the transient overshadowing assessment will be discussed, but the significance of the effect for overshadowing will be defined through the quantitative sunlight amenity assessment (SHOG assessment).

Light Pollution

7.6.38 This is not a comparative assessment, and it is not necessary to assess this against the existing baseline. The Institution of Lighting Professional "(ILP)" publication 'Guidance Notes for the Reduction of Obtrusive Light (GN01:2011)' makes recommendations aimed particularly at avoiding nuisance from obtrusive external lighting installations.

7.6.39 The criteria that will be used to assess the potential effects of Light Pollution is provided in **Table 7.6.6** below.

Table 7.6.6: Light Pollution Criteria

Scale of Effect	Numerical Criteria – Light Pollution – Magnitude of Change / Impact
High	Breaches in ILP post-curfew criteria which may cause a major noticeable change to the sensitive receptor. This may consist of a

Scale of Effect	Numerical Criteria – Light Pollution – Magnitude of Change / Impact
	large proportion of significant breaches of both the pre-curfew and post-curfew criteria suggested within the ILP Guidance Notes.
Medium	Breaches in ILP post-curfew criteria which may cause a moderate noticeable change to the sensitive receptor. This may consist of a large proportion of marginal infringements of the numerical values suggested in the ILP guidance and/or a small percentage of significant infringements. No breaches in ILP pre-curfew criteria.
Low	Small breaches of ILP post-curfew criteria, marginally noticeable to the sensitive receptor. This may include marginal breaches of the ILP criteria which should be viewed in the context of the urban character of the area. No breaches in ILP pre-curfew criteria.
Negligible	No breaches of ILP criteria for pre-curfew or post-curfew.

Solar Glare

7.6.40 This is not a comparative assessment, and it is not necessary to assess this against the existing baseline. We understand there is no quantitative criteria to adopt to understand what acceptable levels of solar glare are and professional judgement will be applied to assign the significance of solar glare in accordance with the recommendations in the BRE Guidelines CIE 146:2002, 'CIE Equations for Disability Glare' published by Commission Internationale l'Eclairage.

7.6.41 The criteria that will be used to assess the potential effects of Solar Glare is provided in **Table 7.6.7**.

Table 7.6.7: Solar Glare Criteria

Scale of Effect	Numerical Criteria – Solar Glare – Magnitude of Change / Impact
High	Glare angles < 5º
Medium	Glare angles between 5º and 10º for a long period of time.
Low	Glare angles between 10º and 30º for a long period of time or between 5º and 10º for short period of time.
Negligible	No instances of glare or glare angles >30 º or between 10º and 30º for a short period of time.

7.7 Wind Microclimate

Summary of Baseline Conditions and Anticipated Sensitive Receptors

7.7.1 Winds for the London area are predominately from the south-west, with a secondary peak from the north-east during spring. Winds are typically stronger in the winter season, and lighter throughout the summer.

7.7.2 Given the height of the Sites compared the local surrounding context, there is likely to be significant interactions between the oncoming wind and building massing of the Proposed Development. The taller elements of the Proposed Development will be narrow in design, so should encourage wind to flow horizontally around them, rather than vertically (i.e. downwashed); however, there will be some element of downwashing winds which could increase wind speeds locally at ground and podium levels. Highest wind speeds are expected between the two Sites and around the taller elements of each Site.

7.7.3 The wind tunnel assessment will consider specific locations where sensitive uses for both pedestrians and cyclists are expected, both on and off-site, up to a range where the Proposed Development would be expected to have an appreciable effect; this will be based on professional judgment and prior knowledge from assessing other schemes in the local area and determined by the local street patterns. Potential sensitive receptors include, but are not limited to:

- Thoroughfares.
- Building entrances to the Proposed Development itself and nearby buildings.
- Amenity spaces at ground level, particularly seating locations.
- Pedestrian road crossing locations.
- Roadways (for the presence of cyclists).
- Retail / commercial frontages.
- Elevated amenity space (rooftop terraces) of the Proposed Development.
- Railway platforms.

7.7.4 Areas inaccessible to the public will not be included in the assessment, due to the lack of regular use and, thus, sensitivity of such space.

Key Issues and Potential Likely Impacts Identified

Demolition and Construction Phase

7.7.5 As demolition and construction works progress, the conditions on and around the Sites would be expected to gradually transition between those of the existing baseline and the final completed Proposed Development.

Operational Phase

7.7.6 The presence of the Proposed Development on the Sites will introduce sensitive uses, which will require a suitable range of wind conditions to be achieved to contribute to a high-quality standard of development. The desired uses at specific locations will dictate the target wind environment.

7.7.7 The presence of massing on the Sites has the potential to redirect higher wind speeds from elevated levels to ground, and winds filtering through the Sites will create areas of comparatively higher and lower wind speeds. Where accelerations of winds flowing through the Site are identified, mitigation may be required in order to provide a satisfactory wind environment.

7.7.8 As with any development with residential use, the presence of elevated amenity by way of private balconies or private / communal rooftop terraces brings a requirement for ensuring these spaces are safe and comfortable for use. Elevated spaces can be inherently windy due to generally increased magnitudes of speeds experienced at height. Mitigation may be required in order to provide a satisfactory wind environment.

Assessment Methodology

Determination of the Baseline

7.7.9 To understand and quantify the baseline conditions (i.e. levels of pedestrian comfort) that currently exist at the Sites, a wind tunnel test of the baseline conditions will be undertaken. To do this, a scale model (likely 1:300) will be constructed, reflecting the existing built form of the Sites and the surrounding area. This scale model will be tested in a boundary layer wind tunnel test facility, to allow the baseline wind microclimate conditions to be quantified.

7.7.10 The baseline results from the wind tunnel will be combined with long-term meteorological climate data for the London area, corrected to the Sites, to understand the baseline conditions specific to the Sites, having regard to their location within London.

7.7.11 The results will be compared with the Lawson Comfort Criteria (London Docklands Development Corporation - LDDC variant) to grade conditions around the Sites. The significance will be graded a shown in **Table 7.7.1** below.

Table 7.7.1: Wind Conditions Significance Criteria

Expected Wind Microclimate	Significance of Effect
Wind conditions are 3-steps calmer than those desired	Major Beneficial
Wind conditions are 2-steps calmer than those desired	Moderate Beneficial
Wind conditions are 1-step calmer than those desired	Minor Beneficial
Wind conditions are as desired	Negligible
Wind conditions are 1-step windier than those desired	Minor Adverse
Wind conditions are 2-steps windier than those desired	Moderate Adverse
Wind conditions are 3-steps windier than those desired	Major Adverse

Prediction Methodology

Demolition and Construction Phase

7.7.12 Generally, for wind microclimate assessments undertaken for schemes in London, the potential effects during demolition and construction are assessed based on the professional judgement of an experienced wind engineer, taking into account an assessment of the background wind microclimate at the site and an understanding of the effects of wind in the built environment. A qualitative approach will be taken to the assessment of the demolition and construction works.

Operational Phase

7.7.13 A wind tunnel test will be undertaken with the Proposed Development in situ, using the same methodology as that for the baseline assessment. In addition, a select number of elevated amenity spaces (rooftop terraces and balconies, both private and communal) will also be instrumented.

7.7.14 Desired wind conditions will be based on the proposed uses for areas around the Sites, informed by the landscape masterplan, architectural models and other information relating to the Sites and surroundings.

7.7.15 Sensitive receptor locations will include (and not necessarily be limited to):

- Pedestrian thoroughfares, targeting 'strolling' conditions in the windiest season;
- Building entrances and (if relevant) bus stops, targeting 'standing' conditions in the windiest season;
- Ground floor amenity areas and roof terraces, targeting a mixture of 'standing' and 'sitting' conditions, with extensive areas of seating targeting 'sitting' conditions, in the summer season;

- Private amenity spaces, targeting 'standing' use conditions in the summer season or 'sitting' use where dedicated seating is provided; and
- All of the above receptors are to have incidences of strong winds (15 m/s) for less than 0.025 % of the year.

7.7.16 Sensitive receptor locations will also include off-Site pedestrian thoroughfares, roadway crossings and railway platforms.

7.7.17 Analysis will be conducted on a seasonal basis; however, the ES chapter will focus on the worst-case results (typically winter, although can be spring or autumn and termed the 'windiest season'), for pedestrian thoroughfares and entrances, and those for the summer season for amenity spaces. In the first instance, proposed landscaping would be excluded in order to provide a least-sheltered, likely worst-case result. Existing landscaping that is material to the local fine-tuning of aerodynamics around the Sites may be included. Assessment of safety risks from strong winds will be undertaken on an annualised basis.

7.7.18 The scenarios to be assessed will include, as a minimum:

1. Baseline – Existing Sites with Existing Surrounding Context;
2. Site A and Site B with Existing Surroundings Context;
3. Site A Only with Existing Surroundings Context;
4. Site B Only with Existing Surroundings Context;
5. Site A and Site B with Future (Cumulative) Surroundings Context; and
6. Any subsequent scenarios as required to verify the effectiveness of mitigation.

7.7.19 A Future Baseline scenario will not be tested initially but will be assessed qualitatively using the results of the Baseline and Cumulative tested scenarios. If areas are highlighted in the Cumulative scenario that could be as a result of the committed developments and not the Proposed Development, a Future Baseline scenario can be conducted to better quantify the impacts.

Mitigation Recommendations

7.7.20 Where required, mitigation will be verified through additional testing and presented within the ES chapter. Typically, conditions that are one Lawson Comfort Category windier than desired, with strong winds present, can be addressed by way of qualitative recommendations.

Cumulative Effects

7.7.21 Wind tunnel testing will also include a scenario with all committed developments around the Sites within the physical constraints of the model – circa 360 / 480m radius from centre of both Sites. This scenario will also be

based on the same methodology as that for the baseline and operational phase assessment. Schemes beyond the 360 / 480 m radius from the centre of both Sites are expected to have a negligible effect on local conditions at the Sites, contributing a small amount of shelter (if anything at all) when winds blow from a direction where committed developments would be up-wind. When developments at this distance are cross-wind or down-wind from the Proposed Development, there will be no interactions.

7.7.22 Sensitive receptor locations for the cumulative assessment will include all types of location noted above for any nearby committed developments, within the area of potential aerodynamic influence of the Proposed Development (determined by engineering judgement).

7.8 Climate Change Mitigation and Adaptation

Summary of Baseline Conditions and Anticipated Sensitive Receptors

Climate Mitigation

7.8.1 or the mitigation aspect of the climate change chapter, the baseline is considered as the GHG emissions that would be emitted or sequestered in the existing Site.

7.8.2 Site A currently comprises industrial-type buildings (providing auto-trading services), hardstanding, Camley Street itself, two small car parking areas, and a cycle path. Site B is comprised of industrial buildings and hardstanding. The baseline assessment will use energy and transport data associated with the current site uses to establish the baseline conditions. In case of an absence of this data, a zero-emissions baseline will be assumed, in line with best practice, representing a worst-case scenario. The baseline will also be described in the context of the UK, London region and LBC carbon budgets, including likely trends in emissions in the future.

7.8.3 The sensitive receptor in this case will be the global atmosphere.

Climate Change Adaptation and Resilience

7.8.4 For the adaptation / resilience part of the climate change chapter, a historic and future baseline will be used. The baseline information will be gathered using the Met Office UK Climate Projection data (UKCP18) and will also utilise local reports of historic occurrences of extreme weather events. The variables that will be assessed includes changes in temperature, precipitation, heatwaves, and wind. The historical baseline will review regional data from the time span 1981-2010 and the future baseline will review regional data from the time spans

2020-2049 and 2050-2079. Using two future baseline time spans will provide projection data for the entire design life of the project to ensure long-term design and maintenance mitigations are considered. The future projections will be assessed under a worst-case Relative Concentration Pathway 8.5 (RCP 8.5), in line with best practice. RCP8.5 is considered to be the worst-case scenario as it assumes more than a 4°C warming above pre-industrial levels and is the most severe pathway.

7.8.5 The sensitive receptor will be the Proposed Development itself, and its occupants / Site users, as well as considering the potential for in-combination climate impacts (ICCI) on sensitive receptors considered in other EIA topics.

Key Issues and Potential Likely Impacts Identified

7.8.6 The climate mitigation section of the ES chapter will be prepared following the Institute of Environmental Management and Assessment (IEMA) guidance 'Assessing Greenhouse Gas Emissions and Evaluating Their Significance' (2022)[51], amongst other guidance sources. The climate adaptation section of the chapter will be prepared following the IEMA's guidance 'Climate Change Resilience and Adaption' (2020)[52], amongst other guidance sources.

Demolition and Construction Phase

Climate Change Mitigation (GHG Assessment)

7.8.7 The demolition and construction of the Proposed Development is likely to result in carbon emissions through key activities such as: the embodied carbon of building materials, demolition and construction generated waste (transportation and disposal), demolition and construction traffic emissions, and the running of demolition and construction plant.

Operational Phase

Climate Change Mitigation (GHG Assessment)

7.8.8 For the operational phase of the Proposed Development, GHG emissions will arise from regulated and unregulated energy use of the proposed housing and other uses, repair / refurbishment over the lifetime of the building and operational transport associated with the Proposed Development. These may be considered significant in accordance with the IEMA guidance, unless it can

[51] IEMA (2022) Assessing Greenhouse Gas Emissions and Evaluating Their Significance

[52] IEMA (2020) Environmental Impact Assessment Guide to: Climate Change Resilience and Adaptation.

be demonstrated how the Proposed Development goes beyond standard practice and aligns with policy that is compliant with a net zero trajectory.

Climate Change Adaptation and Resilience

7.8.9 The Proposed Development will need to adapt and be resilient to the changing climate, as future climate conditions may cause significant effects in relation to risks from (for example, extreme weather, temperature changes and flooding). Key impacts may include overheating of buildings, structural damage due to storms, and flooding due to heavy precipitation and drainage issues. Impacts on other EIA topics receptors, such as impacts on air quality landscape / townscape due to drought, will be assessed in the chapter. The Proposed Development's embedded mitigation measures (from design best practice etc.) will be considered in the assessment of impacts, and significance of effect will be determined accordingly.

Decommissioning Phase

Climate Change Mitigation (GHG Assessment)

7.8.10 The decommissioning of the Proposed Development is likely to result in carbon emissions through key activities such as: transportation and disposal of materials and waste, Site traffic emissions and the running of demolition and construction plant.

Assessment Methodology

Assessment Scenarios

7.8.11 The climate change mitigation and adaptation assessment will be undertaken based on the following three scenarios:

- Scenario 1: Both Site A and B proceed;
- Scenario 2: Only Site A proceeds, without Site B; and
- Scenario 3: Only Site B proceeds, without Site A.

7.8.12 It is anticipated that the key differences in the assessment of each scenario will be related to the mitigation element of the chapter (due to differences in GHG emissions and traffic data). It is unlikely that the adaptation assessment outcomes will vary materially between each scenario. The ES chapter will be structured so that each stage of the project (demolition and construction, operation and decommissioning) considers each scenario separately.

Climate Change Mitigation

7.8.13 The approach to assessing the potential impact of the Proposed Development on climate will follow the Institute of Environmental Management and Assessment (IEMA) guidance 'Assessing Greenhouse Gas Emissions and

Evaluating Their Significance' (2022). This guidance describes how a proportionate assessment of a development's potential impact on climate can be achieved and how to communicate the results in terms of a notional percentage contribution relative to a carbon budget, accounting for achievable mitigation.

7.8.14 The climate mitigation assessment relies on the outputs of the Whole Life Carbon Assessment (WLCA). The WLCA will assess the carbon emissions of the Proposed Development from demolition of the existing Sites' buildings and raw material sourcing for construction materials to decommissioning. The climate mitigation assessment will analyse the carbon emission figures in the context of carbon budgets, assess the significance of the effects and provide mitigation and reduction measures.

7.8.15 The assessment principles involve:

- Policy and legislation landscape;
- Baseline development (see section above);
- Comparing the Project emissions with carbon budgets;
- Embedded mitigation and additional mitigation; and
- Significance Assessment and residual effects.

Comparing the Project Emissions with Carbon Budgets

7.8.16 The Whole Life Carbon Assessment (WLCA) outputs will be required for this stage of the assessment. However, in the event that Proposed Development specific data is not available, the WLCA would use alternative sources of data to estimate emissions. This may include appropriate guidance and benchmarks (such as Royal Institute of Chartered Surveyors (RICS) & Greater London Authority (GLA).

Demolition and Construction Phase

7.8.17 The demolition and construction GHG emissions will be derived from the WLCA. In the absence of existing Sites' / demolition data, a zero emissions baseline would be adopted. The outputs will be in the form of tonnes of carbon dioxide equivalent (tonnes CO2e) from the embodied carbon in the construction materials of the Proposed Development. The WLCA will also provide carbon figures for construction waste, construction activities and plant. The data that will be used to undertake the WLCA includes: estimated quantities and types of construction materials, floor space, demolition and construction vehicle movements, operational energy strategy, operational vehicle movements, and end of life strategy.

7.8.18 In addition to the WLCA outputs, the climate mitigation assessment will need to calculate demolition and construction phase traffic. The latest available version of the Defra Emissions Factor Toolkit (EFT) will be used. This toolkit enables emissions from a vehicle breakdown to be assessed up until 2050 for London. Demolition and construction traffic data will be derived and used in the tool to generate the volume of emissions for the entire demolition and construction period. The emissions from the demolition and construction phase WLCA will then be compared against the carbon budgets for LBC, London and the UK (derived from the Tyndall Centre). Calculating the share of emissions generated from the demolition and construction phase of the Proposed Development will aid the assessment of contextualising the significance of effect.

Operational Phase

7.8.19 Operational GHG emissions will be derived from the WLCA; this will assess the carbon emissions resulting from the amount of carbon emitted during the operational or in-use phase of a building. This includes the use, management, and maintenance of a product or structure.

7.8.20 In order to calculate operational traffic, the Defra EFT will be used, as described for demolition and construction traffic. As above, traffic data will be derived and used in the tool to generate the volume of emissions from projected traffic in a given year for the operational phase.

7.8.21 These emissions will also be compared against the LBC, London and UK carbon budgets for the time horizons relevant to the Proposed Development's operational timescales.

Decommissioning Phase

7.8.22 Future emissions at the end of the Proposed Development's design life will also be taken into account, including those associated with any decommissioning activities. The emissions will be derived from the WLCA and compared against the LBC, London and UK carbon budgets for the time horizons relevant to the Proposed Development's decommissioning timescales.

Embedded Mitigation and Additional Mitigation

7.8.23 Mitigation measures will be presented, following the principles of the carbon management hierarchy based on PAS 2080 (i.e. eliminate, reduce, substitute and compensate), to show how the anticipated GHG emissions of the Proposed Development can be reduced as far as reasonably practicable. These measures will include both embedded and additional measures. Embedded measures include those that are part of the Proposed Development's design, a specific planning requirement, and / or a project commitment. Additional measures are those that are used to mitigate adverse effects that remain following the

implementation of embedded measures and typically have not been committed to as part of the Proposed Development (yet).

Significance Assessment and Residual Effects

7.8.24 The significance of effects assessment will consider the Proposed Development's consistency with policy requirements in line with UK's net zero target trajectory and the embedded / additional mitigations. Examining these elements allows the assessment to make a professional judgement on the likely significance of effects based on a set of significance criteria established in the IEMA GHG Guidance.

7.8.25 Under the Institute of Environmental Management and Assessment (IEMA) (2022) guidance, GHG emissions that prevent the achievement of a trajectory to net zero (following a Science Based Target) should be considered significant in EIA; therefore, the assessment will consider this, and how the Proposed Development goes beyond 'business as usual', to determine whether it will lead to significant environmental effects.

Climate Change Adaptation and Resilience

7.8.26 IEMA's guidance 'Climate Change Resilience and Adaption' (2020) will be followed when assessing climate change resilience and adaptation effects in relation to the Proposed Development. The assessment principles include the following:

- Policy and legislation landscape;
- Historic and future baseline development (see section above);
- Climate Change Adaptation and Resilience Risk Assessment (identification of climate hazards, identification of sensitive receptors, assessment of effects on receptors (sensitivity, magnitude and significance of effect), embedded and additional mitigation); and
- In-Combination Climate Impact Assessment (ICCI).

7.8.27 The adaptation assessment will rely on information including component design specification (i.e. list of assets) and embedded mitigations (nature-based solutions, overheating strategy, flood and drainage strategy etc.).

Climate Change Adaptation and Resilience Risk Assessment

Demolition and Construction Phase

7.8.28 The assessment of climate adaptation for the demolition and construction phase of the Project has been scoped out due to the short timeframe of the phase and that notable changes in the climate will not manifest over the timeframe. Even so, extreme weather events are prevalent and it is, therefore, expected that there would be embedded mitigation measures included within

the CEMP and existing design codes that would remediate the physical climate change risks. This would include measures such as ensuring construction materials are covered when stored and pro-active planning for the possibility of extreme weather events.

Operational Phase

7.8.29 The assessment for the operational phase of the assessment will utilise the historical and future baselines derived from the UKCP18 Climate Projection database and will consider projections for precipitation, temperature, heatwaves and wind for the time horizon appropriate to the operational timeline. The Site-specific climate hazards will be identified and these may include flooding, overheating and drought.

7.8.30 Potential receptors within elements of the Proposed Development relevant to the location, nature and scale of the development will be identified. These receptors will include buildings and infrastructure receptors, human health receptors and environmental receptors. The sensitivities of these receptors to climate change will be determined and considered during the assessment of significance of effects.

7.8.31 An assessment will then be carried out to determine how each receptor is at risk from the climate hazards. This will be carried out using a best practice risk matrix that assesses the likelihood and consequence and overall magnitude of the risk occurring. The assessment includes identification of embedded and additional mitigation measures to combat the risks. The embedded measures will be analysed to determine if they likely to be sufficient, or whether further additional interventions are likely to be required.

7.8.32 The overall significance of effects for each receptor will be determined based on the assessments carried out. The determination of significance will be carried out using a best practice qualitative matrix.

Decommissioning Phase

7.8.33 The assessment of climate adaptation for the decommissioning stage of the Proposed Development has been scoped out as it would occur in the far-distant future and the decommissioning would be completed in a short timeframe, such that notable changes in the climate will not manifest over the timeframe. Even so, extreme weather events will still be prevalent and it is, therefore, expected that there would be embedded mitigation measures included within the Decommissioning Environmental Management Plan (DEMP) and existing design codes that would remediate the physical climate change risks.

In-Combination Climate Change Impacts (ICCI)

7.8.34 The In-Combination Climate Impacts (ICCIs) will be assessed, which is when a projected future climate impact interacts with an effect identified by another

EIA topic and exacerbates its impact (i.e. increase in temperature and overheating can impact the indoor and outdoor air quality).

7.8.35 The receptors are ones that will be impacted by the Proposed Development and are located within the surrounding environment. The outline methodology is as follows: defining a future baseline as for the climate change resilience assessment, review of guidance and topic-specific literature on climate change impacts, assessment of each environmental topic's respective significant effects and the corresponding mitigation measures identified by each topic, assessment of potential in-combination impacts and significant effects, consideration of additional mitigation measures and inclusion of allowances for future mitigation measures and monitoring.

Cumulative Effects

7.8.36 In line with the IEMA (2022) GHG guidance, the assessment of the Proposed Development's emissions will be against particular carbon budgets, which inherently take account of other committed development schemes. Therefore, it is not required to undertake a cumulative assessment.

7.8.37 Regarding resilience and adaptation, the assessment is only concerned with assets of the Proposed Development and a broader consideration of existing interdependent infrastructure. It is assumed that other committed developments in the local area will account for climate change. The ICCI assessment considers the key cumulative effects of climate change on receptors and therefore, a specific cumulative assessment is not required.

7.9 Built Heritage, Townscape and Visual Impact

Summary of Baseline Conditions and Anticipated Sensitive Receptors

7.9.1 An initial desktop study has been undertaken to understand the historic development of the Sites, including map progression and historic records.

7.9.2 Secondary sources have been consulted to determine the built heritage, townscape and visual baseline, including the following:

- National Heritage List for England[53];
- Greater London Historic Environment Record[54];

[53] Historic England, The List. Available at: https://historicengland.org.uk/listing/the-list

[54] Historic England, Greater London Historic Environment Record. Available at: https://glher.historicengland.org.uk/

- LB Camden Local List[55];
- LB Camden Conservation Area Appraisals[56];
- The Camden Local Plan (2017)[57];
- Camden Character Study (2015)[58];
- New Camden Local Plan (January 2024 Draft)[59]:
- London Plan (2021); and
- London View Management Framework (2012)[60].

Heritage

7.9.3 All designated and non-designated heritage assets within a 500 m radius of the Sites' boundaries were identified as part of an initial study area. The initial study area is considered appropriate for the scale of the Proposed Development, taking into consideration the heritage assets surrounding the Sites, topographical conditions and the extent of visibility. A Zone of Theoretical Visibility (ZTV) was produced, based on a model of the emerging Proposed Development and this was assessed against the Heritage Asset Plan, presented in **Figure 7.9.1**.

7.9.4 The initial study area and ZTV exercise allowed for the identification of heritage assets that may be potentially impacted by the Proposed Development.

7.9.5 The Sites do not contain any statutorily designated or locally listed buildings, nor are the located within a conservation area. Within the 500 m study area radius, there are seven conservation areas, 36 listed buildings, one registered park and garden and 23 locally listed buildings.

7.9.6 The area immediately surrounding the Site comprises modern light industrial units, railway infrastructure and post-war residential development. There are

[55] LB Camden, Local List (2015). Available at: https://www.camden.gov.uk/local-list

[56] LB Camden, Conservation Area Appraisals and Management Strategies (various dates). Available at: https://www.camden.gov.uk/conservation-area-appraisal-and-management-strategies

[57] LB Camden, Local Plan (2017). Available at: https://www.camden.gov.uk/camden-local-plan1

[58] LB Camden, Camden Character Study (2015). Available at: https://www.camden.gov.uk/evidence-and-supporting-documents

[59] LB Camden, Draft New Local Plan (2024). Available at: https://www.camden.gov.uk/draft-new-local-plan

[60] London View Management Framework (2012). Available at: https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance-and-spgs/london-view-management#the-document-32755-title

no designated or non-designated heritage assets within the areas to the immediate east, west or south of the Sites. The closest heritage asset to the Sites is the Camden Square Conservation Area, located approximately 30 m to the north of Site A, which comprises a large area of 19th century residential development. The closest listed building to the Sites is a Grade II telephone box on the corner of Murray Street, within the Camden Square Conservation Area.

7.9.7 There is a high concentration of designated and non-designated heritage assets further away, to the north-west, west and south of the Sites. The heritage assets within the study area generally comprise residential buildings, commercial and industrial buildings and structures, and ecclesiastical buildings. The area included in the 500 m radius is a historically mixed industrial and residential area, which was subject to extensive redevelopment in the post-war period and later. As such, the setting of the heritage assets within the study area are experienced as part of a varied urban townscape with a range of building dates and styles.

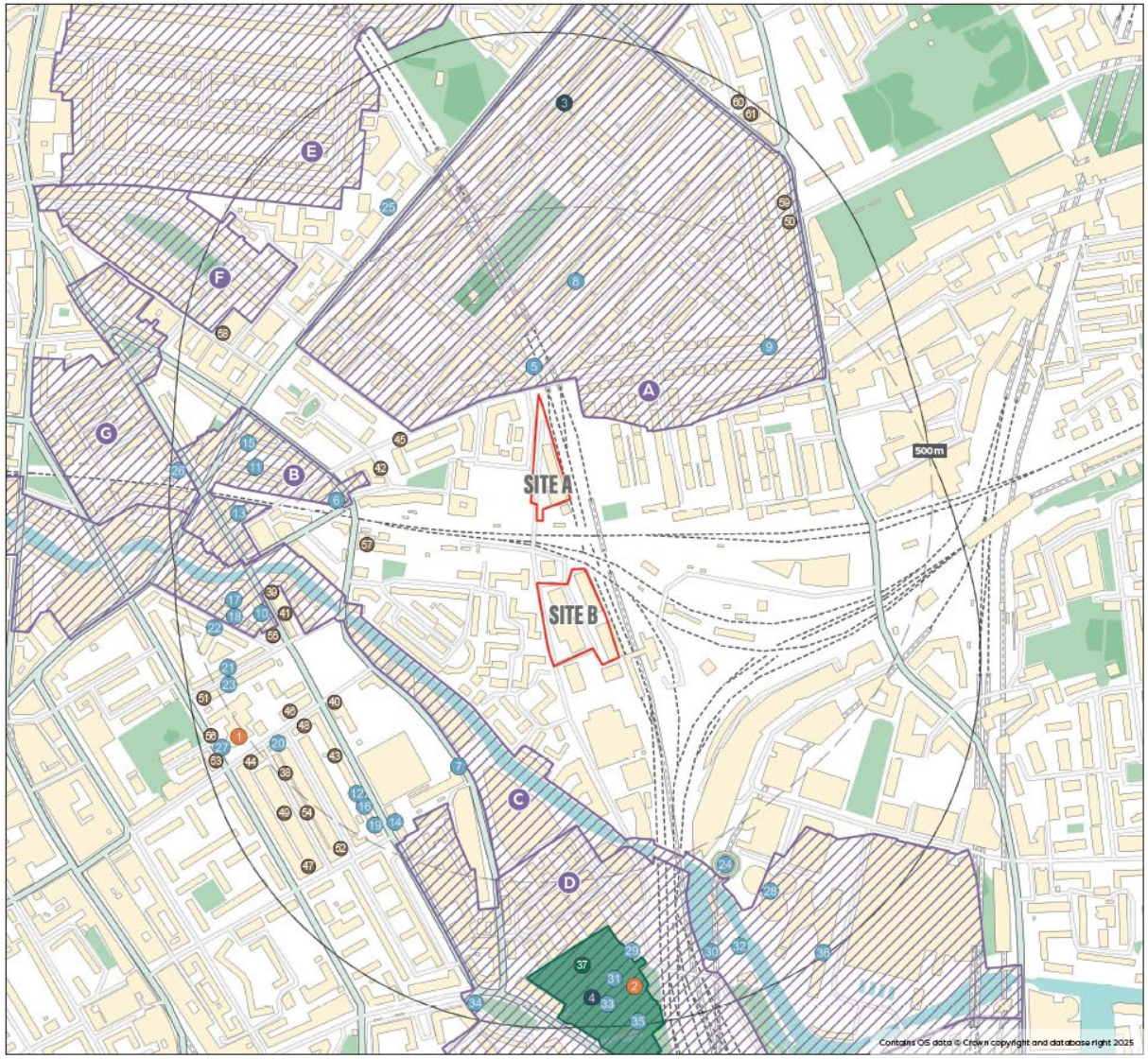
7.9.8 Professional judgement has been applied to this scoping process, to select those heritage assets which may be potentially affected by the Proposed Development, owing to a change in their setting.

7.9.9 Some of the heritage assets within the study area will naturally be more sensitive than others, by virtue of their individual special interest and setting considerations. For example, the All Saints Greek Orthodox Church (**Figure 7.9.1**, Ref. 1) is a Grade I listed building located approximately 434 m to the west of the Sites. This highly graded building features a circular stone tower which is a prominent landmark in the local area. There is a possibility that there would be some intervisibility between the Proposed Development and this building, which has the potential to affect one's ability to appreciate its special architectural and historic interest. It would, therefore, be scoped into the assessment.

7.9.10 Where the Sites have no historic or functional relationship with a heritage asset, and the ZTV indicates that there would be no or limited intervisibility, such as 22 Murray Mews (**Figure 7.9.1**, Ref. 8), the Proposed Development is unlikely to materially alter the setting of the heritage asset. The heritage asset may, therefore, be scoped out of assessment.

7.9.11 Owing to the nature and the height of the Proposed Development and the urban screening provided by existing architectural forms, the visual envelope is limited to certain areas which are illustrated by the ZTV. The highest extent of visibility is experienced in areas which are less sensitive in terms of heritage (broadly covered by TCA 1, as identified in Figure 2); however, there will be some intervisibility in the setting of heritage assets in the wider area.

Figure 7.9.1: Heritage Asset Plan



HERITAGE ASSET PLAN

Application Site

Conservation Areas

A. Camden Square CA
B. Camden Broadway CA
C. Regent's Canal CA
D. King's Cross and St Pancras CA
E. Bartholomew Estate CA
F. Rochester CA
G. Jeffrey's Street CA

Listed Buildings

Grade I

1. All Saints Greek Orthodox Church
2. Tomb of Sir John Soane, his wife and son in St Pancras Old Church Gardens

Grade II*

3. House and attached Garage
4. Burdett-Coutts Memorial Sundial

Grade II

5. K2 Telephone Kiosk at Junction with Agar Grove
6. 111-121, St Pancras Way
7. Penfold Pillar Box outside Parcel Force London Central Office (office not included), St Pancras Way
8. 22 Murray Mews
9. K2 Telephone Kiosk Approx 15 metres from Junction with Cantelowes Road
10. Nos 165-181 and attached Railings
11. Greenwood Almshouses Nos 1-6
12. 91-99, Royal College Street
13. Nos 25-28 and attached Railings to areas
14. Nos 6-22 Royal College Street, and attached Railings and Bollard in Pedestrian Way of No 12
15. Nos 157 and 159 and attached Railings
16. 85c, 87 and 89, Royal College Street
17. Lawfords Wharf Cottage, Grand Union Canal
18. 1-10, Lyme Street
19. Nos 75-85 and attached Railings
20. 82-90, Pratt Street
21. Nos 32 to 53 and attached Railings
22. Nos 24-29 and 31-37 including Nos 33a and 33b
23. Nos 16 to 31 and attached Railings
24. Gasholder No. 8
25. Nos 123 and 125 and attached Railings
26. Camden Road Station
27. Boundary Railings and Gates to All Saints Greek Orthodox Church
28. The Triplet (Gasholder Nos 10, 11 and 12), King's Cross
29. Court Building, St Pancras Coroner's Court
30. Steam Locomotive Water Point
31. Tombs of John Flaxman and Family, and Mary Wollstonecraft, William Godwin and Mary Jane Godwin, St Pancras Old Church Gardens
32. Lock Keepers Cottage on The Grand Union Canal
33. Drinking Fountain Approx 36 metres North West of Church in St Pancras Old Church Gardens
34. Cattle Trough opposite end of Royal College Street
35. Unidentified Tomb in St Pancras Old Church Garden
36. Eastern Coal Drops at Kings Cross Goods Yard

Registered Park and Gardens

37. St Pancras Gardens (Grade II)

Locally Listed Buildings

38. 5-12 Mandela Street
39. 140-142 (even) Royal College Street
40. Golden Lion Public House, 88 Royal College Street
41. 120-136 (even) Royal College Street
42. Granite setted carriageway - Agar Place
43. 101-135 Royal College Street
44. 64 Pratt Street
45. Post Box - Agar Grove (outside Manston)
46. 57 Pratt Street
47. 40 Camden Street
48. 92-106 Pratt Street
49. 19-23 Mandela Street (includes 25 Mandela Street)
50. Boundary Marker - York Way, West side, just south of Market Road (on upper wall of No 77 York Way)
51. 92 Camden Street
52. York House, Plender Street/College Place
53. 85-93 Camden Street
54. 13 Mandela Street
55. Prince Albert PH, 163 Royal College Street
56. Post Box - St Martin's Close (at junction with Camden Street on south side)
57. 2 Barker Drive
58. Granite setted carriageway - Rochester Place
59. Boundary Marker - York Way, West side immediately north of junction with Market Road (on upper wall of No 87 York Way)
60. 19-21 (consec) Cliff Villas
61. 22 Cliff Villas

Townscape

7.9.12 Townscape character areas within a 500 m radius of the Sites' boundaries were identified as part of an initial study area. The townscape character areas are based on distinct character, function and appearance. Seven distinct townscape character areas (TCAs) have been identified within the study area (as presented in **Figure 7.9.2**).

7.9.13 Site observations, a manual desk-based review of Ordnance Survey (OS) maps, published characterisation studies and relevant heritage receptors were used to determine the study area and TCAs. The TCAs and study area were informed by existing building locations, existing building heights, topography and townscape features, and an understanding of the emerging scale of the Proposed Development.

7.9.14 The boundaries and names of the TCAs identified at this stage are subject to change for the final submission of the planning application.

7.9.15 Townscape is the *"built up area, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces"*, as defined in Guidelines for Landscape and Visual Impact Assessment (GLVIA, 3rd Edition)[61].

7.9.16 The Site is located within TCA1: Rail infrastructure and light industrial, and borders TCAs 2, 3, and 7. TCA 1 incorporates an area of rail infrastructure to the north of St Pancras, light industrial estates and concrete manufacturing plant.

7.9.17 The Sites comprise single-storey commercial uses and the Cedar Way Industrial Estate, which is characterised by low scale modern warehouses, and hardstanding. The Sites are divided and bound to the east by railway lines. The Sites are bound to the west by Camley Street and residential development beyond this. Despite its close proximity to industrial uses to the east, Camley Street has a verdant character owing to the extent of mature trees which line it. Within the study area, the majority of development is low to mid-scale, with the exception of a few tall residential and student accommodation buildings, notably an 18-storey flat block on Hazelbury Way, which is located to the west of Site A.

7.9.18 A summary of the TCAs identified at this stage is provided in **Table 7.9.1**, and their boundaries are shown in **Figure 7.9.2**.

[61] Landscape Institute, Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (2013).

Table 7.9.1: TCAs identified for Assessment

Map ref.	Townscape Character Area	Townscape value	Full Assessment Required?
1	Rail infrastructure and light industrial	Low	Yes
2	Coal Drop's Yard	High	Yes
3	Modern Housing	Medium	Yes
4	Camden Square (19th century residential)	High	Yes
5	19th Century Residential	High	Yes
6	Camden Town	Medium	Yes
7	Former industrial and modern housing	Low	Yes

Visual

7.9.19 The preparation of a ZTV has informed the selection of viewpoint locations that are representative of the experience of visual receptors (people) that may experience change to visual amenity as a result of the Proposed Development.

7.9.20 The ZTV will be updated based on revised versions of the Proposed Development, and the location of viewpoints reviewed. The number and location of viewpoints may, therefore change, for the final submission of the planning application, subject to agreement with the LBC.

7.9.21 The selection of viewpoints has also been informed by strategically important static views, including those identified in the 2012 London View Management Framework (LVMF). Unlike representative views, which are bespoke to the Sites and nature of the Proposed Development, the static strategic views have prescribed coordinates, protected features and management guidance (please refer to the LVMF.

7.9.22 Viewpoints have also been selected with consideration of the Heritage Asset Plan presented in **Figure 7.9.1** and Townscape Character Area Plan presented in **Figure 7.9.2**, and local planning documents, including the Camley Street Neighbourhood Plan[62].

7.9.23 The viewpoints identified within **Figure 7.9.3** will inform discussions with the LBC, on the views to be included in the EIA.

7.9.24 The baseline study has identified individuals and, or, defined groups of people within the area who might notice a change to visual amenity. These are the

[62] Camley Street Neighbourhood Forum, Camley Street Neighbourhood Development Plan (2019-2034). Available at: https://www.camden.gov.uk/camley-street-neighbourhood-forum

'visual receptors'. The experience of visual receptors will be assessed using a number of representative local views that are likely to be impacted by development of the scale proposed on the Sites. The EIA will identify the receptor groups that will experience each representative view as will be set out in the 'Assessment Methodology' presented below. The visual receptors identified at this stage are summarised in **Table 7.9.2** and the representative view locations are shown in **Figure 7.9.3**. Additional receptor groups may be identified as part of the final assessment.

Table 7.9.2: View Receptors identified for Assessment

Visual receptor	Visual amenity value	Full Assessment Required?
Residents	Medium	Yes
Workers / commuters	Low	Yes
Users of open space	Medium	Yes

7.9.25 As well as representative views, the assessment will consider static views identified in the Development Plan[63]. London Plan Policy HC3 identifies the requirement to manage and protect designated views identified in the LVMF. The relevant static views to the Proposed Development are as set out below:

- Site A is located within the viewing corridor LVMF 3A.1: Kenwood viewing gazebo to St Paul's Cathedral; and
- The viewing corridor of LVMF 2A.1: Parliament Hill summit to St Paul's Cathedral passes to the south of Site B.

7.9.26 The representative and static views identified for assessment at this stage are summarised in **Table 7.9.3**.

Table 7.9.3: Views identified for Assessment

View	Location	Representative / Static view
1	LVMF 2A.1 Parliament Hil	Static
2	LVMF 3A.1 Kenwood	Static
3	Primrose Hill	Representative
4	Natural Park	Representative
5	St Pancras Gardens	Representative
6	St Martin's Gardens	Representative
7	St Martin's Close	Representative

[63] Comprising the Camden Local Plan (2017), London Plan (2021) and Camley Street Neighbourhood Development Plan (2019-2034).

View	Location	Representative / Static view
8	Pratt Street	Representative
9	North Villas / Camden Terrace	Representative
10	St Augustine's Road / Cantelowes Road	Representative
11	Agar Grove / Murray Street	Representative
12	Camley Street (looking south)	Representative
13	Hazelbury Way	Representative
14	Georgiana Street	Representative
15	Barker Drive	Representative
16	Rossendale Way	Representative
17	Bowmore Walk	Representative
18	Freight Lane	Representative
19	Camley Street	Representative
20	Camley Street	Representative
21	Caledonian Road Park	Representative
22	Bingfield Park	Representative
23	Oakley Square	Representative
24	Rochester Terrace Gardens	Representative
25	St Pancras Way / College Gardens	Representative
26	Cantelowes Gardens	Representative

Figure 7.9.2: Townscape Character Area Plan

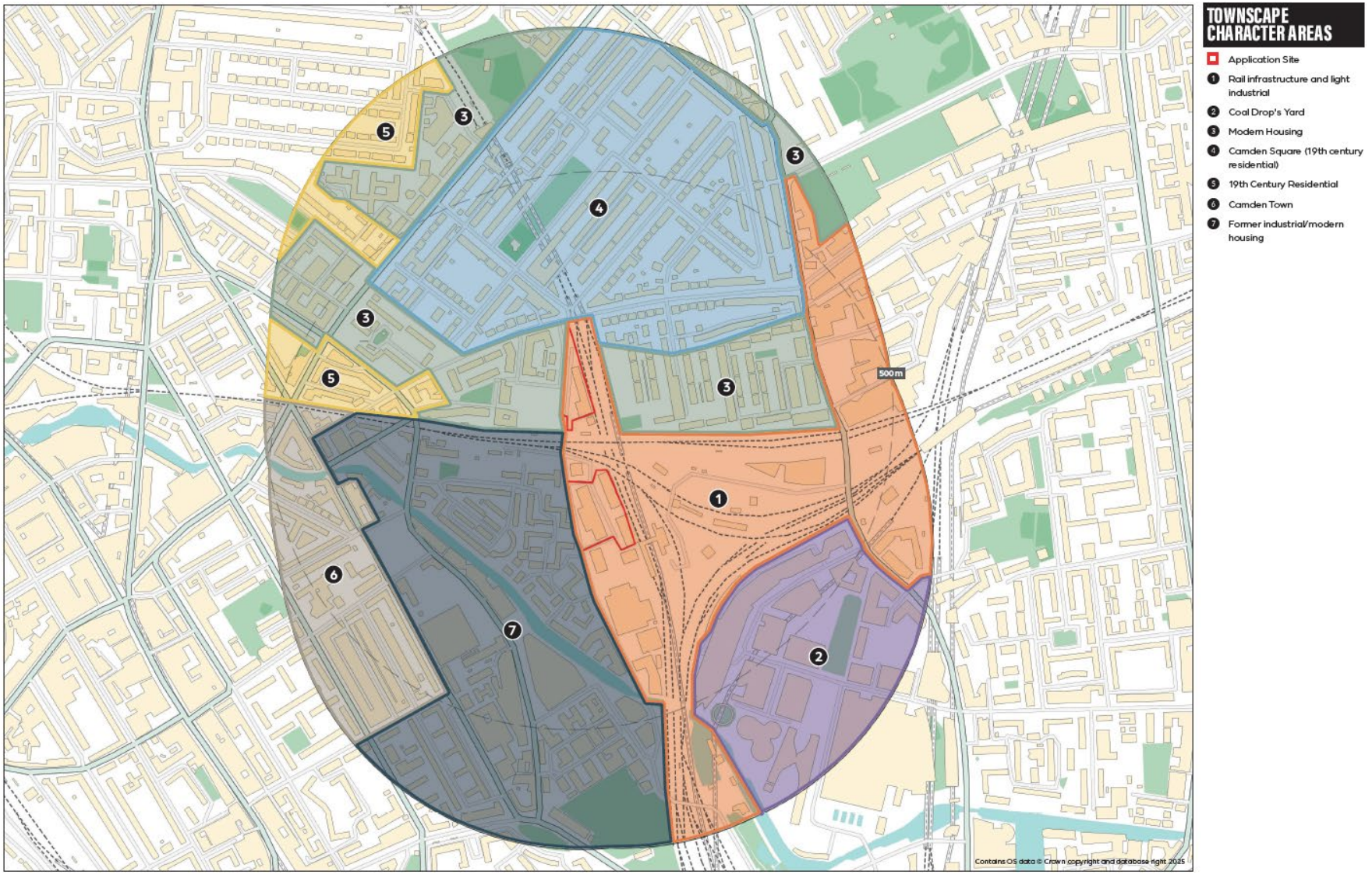
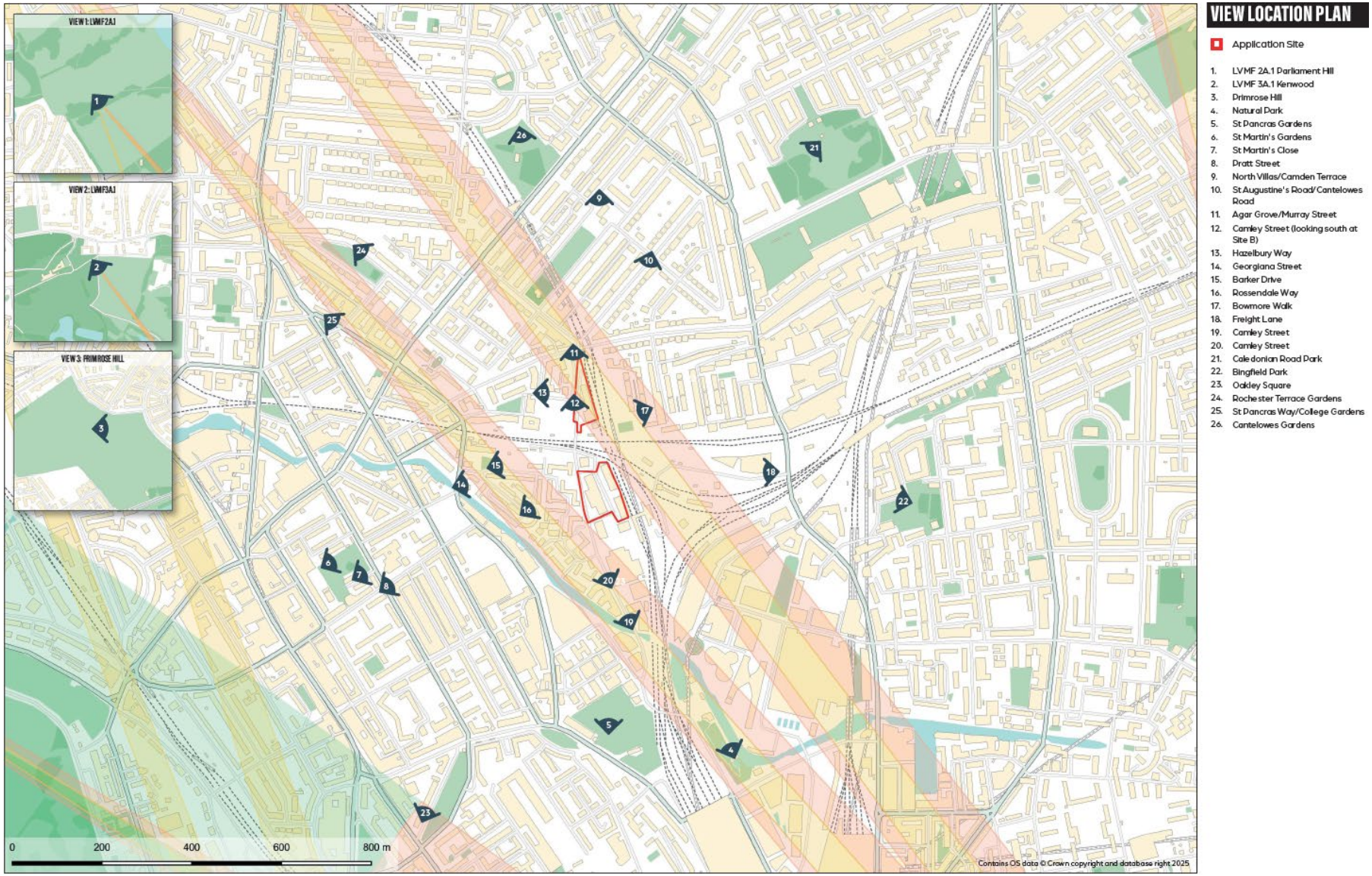


Figure 7.9.3: View Location Plan



VIEW LOCATION PLAN

Application Site

1. LVMF 2A.1 Parliament Hill
2. LVMF 3A.1 Kenwood
3. Primrose Hill
4. Natural Park
5. St Pancras Gardens
6. St Martin's Gardens
7. St Martin's Close
8. Pratt Street
9. North Villas/Camden Terrace
10. St Augustine's Road/Cantelowes Road
11. Agar Grove/Murray Street
12. Camley Street (looking south at Site B)
13. Hazelbury Way
14. Georgiana Street
15. Barker Drive
16. Rossendale Way
17. Bowmore Walk
18. Freight Lane
19. Camley Street
20. Camley Street
21. Caledonian Road Park
22. Bingfield Park
23. Oakley Square
24. Rochester Terrace Gardens
25. St Pancras Way/College Gardens
26. Cantelowes Gardens

Key Issues and Potential Likely Impacts

Demolition and Construction Phase

7.9.27 The effects of the Proposed Development which occur during the demolition and construction period are likely to arise from the visual impact of demolition and construction activities, particularly the use of large items of machinery, hoardings, cranes, structures under construction and various operations. These activities have the potential to affect the setting of heritage assets and alter the existing townscape character and visual amenity of the Site and the surrounding study area. Furthermore, these activities can cause temporary effects on visual amenity, associated with noise, vibration, and traffic.

Heritage

7.9.28 The demolition and construction phase of the Proposed Development will involve the demolition of the buildings which currently occupy the Sites. These are not considered to have any heritage value, nor to contribute positively to the setting of the heritage assets within a 500 m radius of the Sites. The affects arising from the demolition works would be limited to the visual impact of construction machinery which may be visible in the setting of the heritage assets located closer to the Sites. Those heritage assets located further from the Sites are unlikely to experience any change as a result of the demolition and construction phase. The demolition and construction effects are expected to not be significant, owing to the temporal nature of the works and their culmination being the operational Proposed Development.

Townscape

7.9.29 The demolition and construction phase will involve the demolition of the buildings which currently occupy the Sites. The Site is an enclosed area of an industrial estate and is not well utilised by pedestrians or local residents. There will be increased disruption and traffic associated with the demolition and construction phase, which will have an adverse impact on residential areas within close proximity to the Site. Those TCAs further away from the Site are likely to experience less disruption as a result of the demolition and construction phase. The construction effects are expected to range from negligible to moderate in scale, and neutral to adverse in nature.

Visual Impact

7.9.30 Visual receptors in closest proximity to the Sites, such as pedestrians and residents, are likely to experience a considerable change to their visual amenity as a result of the demolition and construction phase, albeit temporary. Those receptors at a greater distance from the Sites are likely to experience less disruption as a result of the demolition and construction phase. The demolition

and construction effects are expected to range from negligible to moderate in scale, and neutral to adverse in nature, arising from the increased demolition and construction traffic into and out of the Sites and the presence of construction machinery including cranes.

Operational Phase

7.9.31 The effects from the operational Proposed Development are likely to arise from the introduction of new built form, including tall buildings, and intensification of built development on the Sites, which would have the potential to change the setting of some heritage assets in the surrounding area, and alter the existing townscape character, quality of the Sites and the surrounding townscape locally.

Heritage

7.9.32 The Proposed Development would introduce new mid to high-rise buildings within the wider setting of heritage assets within the study area. For the majority of heritage assets, any visibility would be limited to glimpsed views of the tallest elements on sight, through building gaps or as part of the established urban skyline. Considering the urban environment of the heritage assets within the study area, the change to their setting is not likely to have a material impact to significance and would not directly affect the intrinsic special interest of these buildings. Those heritage assets which would experience the greatest change to their setting are likely to be closer to the Sites, notably the Camden Square Conservation Area, where more of the Proposed Development may be visible in their setting. The likely effects arising from the completed Proposed Development are expected to range from negligible to moderate in scale, and neutral to beneficial in nature.

Townscape

7.9.33 The Proposed Development would introduce a new urban design for the Sites, involving new landscaping, residential, light industrial, office, retail and life science development. The Proposed Development would optimise the use of the Sites, resulting in increased density and scale. The effects of the operational phase of the Proposed Development would be greatest on TCA 1, in which the Sites are located, and TCAs 3 and 7, which comprise residential areas to the immediate west and north of the Site. TCAs which are further away from the Sites are unlikely to experience a material change in their townscape character. The likely effects are expected to range from negligible to moderate in scale, and neutral to beneficial in nature.

Visual Impact

7.9.34 The operational phase of the Proposed Development is likely to result in a change to the visual amenity of receptors in closest proximity to the Site. Significant changes are likely to be local. The likely effects are expected to range from negligible to moderate in scale, and adverse to beneficial in nature.

7.9.35 The design of the Proposed Development will have regards to LVMF 2A.1 and LVMF 3A.1, and it will seek to follow the management guidance in the LVMF and relevant policies.

7.9.36 Site A is located in the viewing corridor of LVMF 3A.1; however, owing to the scale of development proposed for Site A, a significant likely effect is not anticipated.

7.9.37 A significant likely effect is not anticipated on LVMF 2A.1 as the Sites are outside the viewing corridor and the scale of development being considered would not affect the characteristics of the view.

Assessment Methodology

7.9.38 The Built Heritage, Townscape and Visual Impact Assessment (BHTVIA) will address the following potential heritage, townscape and visual impacts and their potential impacts (both in the demolition and construction and operational phases):

- Temporary change in the setting of heritage assets, townscape character and views during demolition and construction works; and
- Permanent changes to the setting of heritage assets, local townscape and selected key views.

7.9.39 The BHTVIA will be prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and published best practice guidance using professional judgment.

7.9.40 In relation to the BHTVIA, professional judgement may be exercised when an effect or impact is ambiguous; wherever it is used, the discursive analysis in the BHTVIA will set out how the assessor has reached the relevant conclusion. The BHTIVA will assess the Proposed Development in both the demolition and construction and operational phases.

Heritage

7.9.41 Where the Proposed Development may impact the surroundings in which built heritage receptors are experienced, a qualitative assessment will be made of whether, how and to what degree setting contributes to the built heritage value of the receptor. The full assessment methodology will be provided in the

BHTVIA; however, in brief, this assessment will be made using the following staged approach:

- First, the built heritage value of each receptor will be assessed as part of the baseline assessment;
- Secondly, the sensitivity of the receptors and, subsequently, the magnitude of any impact will be assessed using professional judgment related to the receptors' susceptibility to change and the duration, extent and type of impact. Considerable weight will be given to the impact of the Proposed Development on identified built heritage receptors in undertaking this assessment;
- Thirdly, the assessment will combine the measures of built heritage value and magnitude of impact to provide a measure of the likely significance of effect. These effects range from no effect to major and may be beneficial or adverse; they will be considered 'significant' when deemed to be moderate to major; and
- Once the Proposed Development's likely significance of effect on built heritage receptors is ascertained, consideration will then be given to the potential mitigation of any residual harm.

Townscape

7.9.42 An initial assessment will define distinct and recognisable patterns of elements, or characteristics that make one area different from another, rather than better or worse. An assessment will be made of the Sites and surrounding townscape in its existing state.

7.9.43 The objective of identifying the existing context will be to provide an understanding of the townscape in the area that may be affected; this includes its constituent elements, its character and the way this carries spatially, its geographic extent, its history, its condition, the way the townscape is experienced, and the value attached to it.

7.9.44 This analysis will inform the division of the study area into townscape character areas i.e. geographical areas which have readily identifiable characteristics in common.

7.9.45 The impact of the Proposed Development on the identified townscape character areas will be assessed, informed by conclusions drawn from the visual assessment.

7.9.46 Professional judgement will be used to assess the impact of the Proposed Development on townscape receptors. This assessment will be carried out in line with the methodology and advice set out in GLVIA3 and the London Views Management Framework (LVMF; 2012), using the following staged approach:

- An assessment will be made of the Sites and surrounding townscape in its existing state and used to inform the division of the study area into townscape character areas i.e. geographical areas which have readily identifiable characteristics in common; and
- The impact of the Proposed Development on the identified townscape character areas will then be assessed, informed by conclusions drawn from the visual assessment – this assessment will take into account the magnitude of change to the composition and character of an area as a result of the Proposed Development, with factors such as the proximity, scale and the contribution made by the Proposed Development to the composition of the area considered. The magnitude of the change resulting from the Proposed Development will be assessed as major, moderate, minor, negligible or no effect.

7.9.47 The assessment will also consider how potential impacts would vary with seasonal change and changes in atmospheric conditions where applicable. The sensitivity of the receptor as existing will be assessed as high, medium or low, depending on the importance, value and quality of the receptor. The assessment will take into account the contribution to the townscape or view of any listed buildings or conservation areas, and other areas, and the amenity value of the viewing location and the area in which it is located. The assessment of the sensitivity of the receptor under consideration will be moderated to take into account a judgment about its quality.

Visual Impact

7.9.48 The views will be assessed in groups that are representative of a particular characteristic or receptor (i.e. residents, road user / pedestrian, leisure, etc.). The following visual receptors are identified by GLVIA3 as being likely to be the most susceptible to change:

- Residents: This receptor is likely to have a greater familiarity with an area, and therefore a higher susceptibility. They could be close to their homes, or moving around the area;
- Users of Open Space: People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views; and
- Workers and Commuters: Those commuting through the area, or those engaged in work related activities.

7.9.49 The overall susceptibility of these receptors will be dependent on the baseline conditions of the environment in which they are located. Susceptibility is, therefore, applied on a graduating scale, in line with advice from the GLVIA and

using professional judgement, having analysed the surrounding built environment as part of the baseline conditions. This will be done so on a scale of high, medium and low; high being a low ability to accommodate the specific change, and low being a high ability to accommodate the proposed change.

7.9.50 Assessment viewpoints have been identified based on a comprehensive review of the surrounding area, including the following criteria:

- Heritage assets;
- Townscape character;
- Where the Proposed Development may be conspicuous;
- Where the Proposed Development may be visible from concentrations of residential areas;
- Spatial alignment;
- Open spaces (parkland, publicly accessible space);
- Potentially sensitive receptors (e.g. schools);
- Accessibility to the public;
- The viewing direction, distance and elevation; and / or
- Transport nodes.

7.9.51 The identification of viewpoints adopted for the assessment has been developed with an awareness of the built context of the Sites; a list of views proposed for the assessment is provided at **Table 7.9.3**. These are illustrated on the viewpoint location plan (**Figure 7.9.2**).

7.9.52 The study area is centred on the Sites, and viewpoints limited to locations where the Sites can be seen, or where the Proposed Development's height and massing has the potential to result in significant visual impact.

7.9.53 Viewpoint locations will be informed by architectural and historic accounts of the area, an appraisal of the existing Site and surroundings, and relevant policy designations, with further viewpoints agreed if necessary. At present, 26 viewpoints have been identified for assessment, as presented in **Table 7.9.3** above.

7.9.54 In order to assess the full range of potential visual impacts of the Proposed Development, three scenarios of accurate visual representation (AVRs) will be prepared from each viewing location selected:

- Existing: visual amenity as represented currently;
- Proposed: Site A – wireline (AVR1) or rendered (AVR3) of the Proposed Development;

- Proposed – Site B – wireline (AVR1) or rendered (AVR3) of the Proposed Development
- Cumulative: Proposed Site A + Proposed Site B + committed developments.

7.9.55 Existing photography will be taken in winter conditions, when trees are not in leaf. This is required to demonstrate the maximum possible extent of visibility in the proposed and cumulative scenarios.

7.9.56 Images as proposed will take the form of AVRs produced by accurately inserting images of the Proposed Development, created based on a three-dimensional computer model of the Proposed Development, into surveyed existing photograph.

7.9.57 For each of the identified views, a description of the general character of the view as existing will be given for each group, with provision of each individual viewpoint's character, quality, and sensitivity to change, which will be tabulated. A description of the visual amenity for each group as proposed will then be given with a narrative assessment, based on the method outlined above, of the effect that the Proposed Development will have on the composition, quality and character of the view as understood as a group.

7.9.58 An overall assessment of cumulative effects (i.e. the effect of the Proposed Development taking into account other committed developments) will also be provided. The approach to cumulative assessment will consider the effects of the Proposed Development in addition to the committed developments. Where other committed developments in the wider area would be visible to a significant extent in the view, a further image showing these together with the Proposed Development will be produced, and a further assessment of the cumulative effects.

Assessment Criteria

7.9.59 The sensitivity of a receptor to the Proposed Development will be judged by calibrating the baseline value of the receptor and its susceptibility to change (i.e. the impact). Susceptibility is the ability of the receptor to accommodate change without undue consequences for the maintenance of the baseline situation, and / or the achievement of planning policies and strategies.

7.9.60 Demolition and construction related effects will be treated as less significant as they are considered to be temporary in nature.

7.9.61 At the operational phase, the Proposed Development will incorporate primary mitigation measures that have become embedded into the design. The mitigation measures employed will be designed to prevent / avoid significant adverse effects through careful planning, access, layout and scale.

7.9.62 For effects which are judged to be minor, moderate or major, the effect will be further categorised as beneficial, neutral or adverse. Adverse effects are those that detract from the value of the townscape or view. This may be through the removal of valuable characterising elements, or the addition of new intrusive or discordant features. Beneficial effects are those that contribute to the value of the area. This may be through the introduction of new positive attributes, for example, through improved legibility.

7.9.63 A neutral effect would be one where townscape character, or the composition of a view, may change but its overall quality does not, or where the balance of positive and negative effects is finely balanced. Effects can be significant and neutral in quality terms, i.e. noticeably different but not better or worse in terms of quality.

7.9.64 Where the effect is minor, moderate or major, good design can reduce or remove potential harm or provide enhancement.

Mitigation Recommendation

7.9.65 Mitigation measures will be described within the Design and Access Statement and Chapter 5: Demolition and Construction and Proposed Development Overview of the ES, and would need to be implemented through the detailed design.

7.9.66 Inherent mitigation measures for townscape and visual receptors during the operation of the Proposed Development could include the following:

- The high-quality design of the proposed buildings, thus enhancing the existing general townscape of the area. This is especially important in the design of tall buildings with regard to their impact upon the settings of designated heritage assets;
- Visually appropriate design materials to mitigate change to the immediate built environment;
- The provision of public benefits in terms of the increased level of accessibility and connectivity of the site with its wider surrounds; and
- Environmental improvements - these will be achieved as noted in the above points.

Cumulative Effects

7.9.67 The cumulative effects assessment will consider the Proposed Development in addition with the committed development is presented in **Table 6.3.2**. The cumulative schemes considered will be those which already have consent or are implemented. The 'additional' method is clarified in paragraph 7.3 of the

GLVIA where it states that they are defined as 'additional changes caused by a proposed development in conjunction with other similar developments'.

7.9.68 The BHTVIA will be one document, with separate assessments considering both Site A and Site B in isolation.

7.9.69 A qualitative assessment will be provided, looking at the cumulative effect of both Sites in combination. A further cumulative assessment will also be provided, comprising both Sites in combination, plus committed developments.

7.9.70 To inform the cumulative assessment, a further scenario of verified view will be provided: Cumulative – Proposed Site A + Proposed Site B + committed developments.

7.9.71 A single 'cumulative' scenario is proposed for the verified views, which is reasonable and proportionate to the scale of the assessment. The 'cumulative' views scenario will be sufficient to illustrate the potential cumulative impacts and inform the assessment of the Proposed Development. The Proposed Development and committed development will be colour coded to denote their use e.g. a different colour provided for Site A, Site B and committed developments.

8. Non-Significant Issues

8.1 Topic Sections

8.1.1 The following sections of this EIA Scoping Report describe the topics where it is believed there is not the potential for significant environmental effects to arise from impacts associated with the Proposed Development.

8.1.2 The following topics are proposed to be scoped out of the EIA as standalone chapters:

- Archaeology;
- Aviation;
- Ground Conditions and Contamination;
- Ecology;
- Electronic Interference;
- Human Health;
- Materials and Waste;
- Major Accidents and / or Natural Disasters; and
- Water Resources and Flood Risk.

8.2 Archaeology

8.2.1 An Archaeological Desk-Based Assessment (presented in **Appendix A**) was prepared in July 2023, which identified the following:

- There is an archaeological interest within the Sites. This is defined as the potential for remains of the 19th century goods shed in the southern half of Site B. The remains likely to be encountered would be associated with the shed's former foundations, together with material culture associated with the operational use of the depot.
- The Sites also have broad potential for prehistoric archaeology, inferred from its proximity to the former course of the River Fleet. Evidence of settlement and use of the river during the period has been found in the upper and lower courses of the former river.
- Any potential adverse impact from the Proposed Development would be permanent and irreversible in nature. However, this potential adverse effect could be reduced through the implementation of an appropriate scheme of archaeological mitigation, in accordance with national and local planning policy.

- The presence, location and significance of any potential buried archaeological remains within the Sites cannot currently be confirmed on the basis of the information available, as the Sites themselves have not previously been the subject of any form of archaeological investigation. Further archaeological investigation may be required by the archaeological advisor for the LBC. The need for, scale and scope of further archaeological works would be agreed through consultation with the relevant statutory consultees, and it is anticipated that any further archaeological works would be secured through appropriately worded pre-construction planning conditions.

8.2.2 In view of the above and the potential for the implementation of an appropriate scheme of archaeological mitigation to reduce the potential adverse effect likely to be brought about by the Proposed Development, it is considered unlikely that there would be any significant effects on archaeological remains from the Proposed Development, during demolition and construction or operation. Therefore, it is proposed to scope this topic out of the EIA.

8.3 Aviation

8.3.1 There are no airports located within an approximately 10 km radius of the Sites; London City Airport is situated approximately 12.3 km to the south-east of the Sites, whilst London Heathrow is located approximately 21 km to the south-west of the Sites. As the Sites are located a significant distance away from airports, they are unlikely to be within key flight paths or airport exclusion zones. In addition, at a maximum of 30 storeys, the Proposed Development will not likely interfere with radar systems. Consequently, it can be concluded that there will be no significant aviation impacts and, therefore, it is proposed to scope this topic out of the EIA.

8.4 Ground Conditions and Contamination

8.4.1 A Phase 1 Desk Study (presented in **Appendix B**) was undertaken in May 2023, of which the earliest map studied (dated 1851) shows Site B to be occupied by the Midland Counties Railway Goods Depot and Site A to be occupied by a road bisecting it in a north-south alignment. The next available map (dated 1874) shows Site B to be occupied by a large railway goods shed, with the remainder of Site B and Site A occupied by railway sidings. The surrounding area was largely in use for the railways including a coal depot to the east and an engine shed and workshop located approximately 80 m to the south-east of the Sites.

8.4.2 Between 1928 and 1946, a conveyancer factory was constructed approximately 60 m to the east of Site A, though the factory was demolished in 1968 and 1969.

8.4.3 Sometime between 1974 and 1982, the area was developed with a number of commercial units constructed on the Sites and the surrounding area developed with residential buildings. The Sites and surrounding area appear to be their current configuration by 1985, following the construction of the commercial units in Site A by this time. In addition, an electrical substation is shown directly to the south of Site A and a substation shown in the west of Site B by this time. The Sites and surrounding area have since remained essentially unchanged.

8.4.4 Based on the Phase 1 Desk Study (presented in **Appendix B**), the Sites are expected to be directly underlain by the London Clay Formation, although a thickness of made ground is likely to be present associated with former uses of the Site.

8.4.5 The results of the Phase 1 Desk Study indicated that the Sites have a potentially contaminative history, having been occupied by railway land since prior to 1851 until some time between 1974 and 1982. This usage may have resulted in localised spillages and leaks of hydrocarbons, coal dust, metal particulates and asbestos fibres, along with possible localised spillages of handled cargoes. Additionally, since the Sites were redeveloped between 1974 and 1985 to the existing configuration of commercial units, Site A appears to have been almost solely used for vehicle repair and service, which may have resulted in localised spillages and leaks of hydrocarbons, heavy metals and solvents.

8.4.6 In view of the above and the source-pathway-receptor approach undertaken as part of the Phase 1 Desk Study, there was considered to be a low to medium risk of there being a significant contamination linkage at the Sites that would require major remediation work. Consequently, it was recommended that a Phase 2 ground investigation be undertaken, to identify risks associated with any potentially contaminated soils that may be present on the Sites, due to past activities. The ground investigation would be designed to target area identified as being of concern and where any contamination is identified, a remediation strategy will be prepared in consultation with LBC, to be implemented prior to the commencement of any construction works.

8.4.7 There was not considered to be a significant potential for hazardous soil gas to be present or migrating towards the Site.

8.4.8 A Preliminary Unexploded Ordnance (UXO) Risk Assessment (undertaken as part of the Phase 1 Desk Study), which indicated that during World War II, the Sites were located within the Metropolitan Borough of St Pancras, which sustained an overall very high bomb density. London Bomb Census mapping also indicated a single high explosive strike on the Sites' boundaries and two additional strikes within the immediate vicinity of the Sites. Site B was covered by a building during the war and, therefore, it is likely that any evidence of UXO would have been noted. Additionally, any damage is likely to have been

repaired quickly in order to maintain the depot and tracks' operational, such that the main risk from UXO falling (during the same raid after damage was sustained) may have gone missing among debris. Consequently, it was recommended that a detailed UXO risk assessment be completed.

8.4.9 As a result of the findings of the Phase 1 Desk Study, it is considered unlikely that there will be any significant effects in relation to ground conditions and contamination, as a result of the demolition and construction, and operation of the Proposed Development. Nevertheless, mitigation measures would be implemented during the demolition and construction, and operational, phases of the Proposed Development, such as:

- The implementation of a Phase 2 ground investigation and a remediation strategy, if required.
- All demolition and construction activities will be undertaken in line with Construction Design and Management (CDM) Regulations, CL:AIRE Development Industry Code of Practice, as well as best practice measures (i.e. tool-box talks, personal protective equipment (PPE), and working method statements as required) and led by the contractor, when appointed.
- During operation of the Proposed Development, whilst there may be the potential for fuel spillages to occur on areas of hardstanding, there will be a controlled drainage scheme as part of the Proposed Development's drainage strategy, which will include necessary pollution preventative measures (i.e. interceptors etc.).

8.4.10 In view of the above, it is proposed to scope this topic out of the EIA. However, the Phase 1 Desk Study (presented in **Appendix B**) will be submitted as part of the planning application and further work in the form of a detailed UXO risk assessment will be completed in advance of any intrusive groundworks being undertaken on the Sites.

8.5 Ecology

8.5.1 A Preliminary Ecological Assessment (PEA) (presented in **Appendix C**) was undertaken in April 2021, which included a visit to the Sites on 30th March 2021. Both Sites comprise of light industrial uses, with Site A comprising primarily car repair workshops and Site B comprising warehouses and distribution units.

8.5.2 There are no legally protected sites (e.g. SSSIs) within a 500 m radius of the Site; however, four non-statutory sites are located within 500 m. These are SINCs, which are divided into Metropolitan, Borough and Local SINCS, depending on their importance. These four SINCS include the:

- North London Line rail corridor Site of Borough Importance for Nature Conservation (SBINC);

- Regent's Canal (part of London's Canals Site of Metropolitan Importance for Nature Conservation (SMINC);
- St Pancras Gardens SBINC; and
- Camley Street Natural Park SMINC.

8.5.3 Within Site A, there are two mature London Plane trees in the centre, along with a self-sown tree of heaven located on each the northern and southern boundaries. There is also scrub comprising goat willow, sycamore and butterfly bush at the northern tip of Site B. This area has been subject to some 'gardening', though ag the time of the survey, much of the area below the self-sown scrub was compacted bare ground. The narrow strip of vegetation between Camley Street and the Agar Grove estate (situated to the west of Site A) consists mostly of ruderal (weedy) plants. The pedestrian / cycle route to Agar Grove is almost devoid of vegetation.

8.5.4 Within Site B, the amenity space between Camley Street and the warehousing in Cedar Way comprises various planted trees, including (but not limited to) varieties of oak, birch and ash, and shrubs including hazel, holly and firethorn. On the largest amenity green space at the junction of Camley Street and southern access road into Cedar Way, a small orchard has been planted, comprising mainly of apple. Beneath the trees is a rough-mown weedy grassland including typical ruderal species, such as (but not limited to) common mallow, netter and dandelion. Around the periphery of Site B are small areas of partly vegetated waste-ground, with species such as pellitory-of-the-wall, sow thistle, groundsel and red deadnettle.

8.5.5 Sites A and B are separated by the London Overground rail corridor. The railside habitat is dominated by scrub and secondary woodland comprising buddleia, sycamore, silver birch, goad willow and ivy. Patches of rough grassland and ruderal habitats along the edges of the railway lines themselves, but the composition of this habitat cannot be determined due to the lack of access. Larger trees, such as grey poplar, occur in places along the base of the embankment. The mainline rail corridor which runs along the eastern boundary of the Sites is largely devoid of vegetation.

8.5.6 To the west of the Sites are residential areas; the area to the west of Site A have a typical amenity landscape of scattered amenity trees and mown grassland with negligible ecological value, and the area to the west of Site B have amenity landscaping comprising retained specimen and quite dense planting of amenity trees and shrubberies. Although not of significant ecological value, the landscaping in the residential area to the west of Site B provides reasonably good habitat for a range of common birds, such as blackbird, robin and blue tit.

8.5.7 Neither Site A, nor Site B, has habitats or features that are likely to provide breeding, hibernating or roosting opportunities for specially protected species such as bats, reptiles or Schedule 1 birds. Additionally, the habitats present on the Sites and in the surrounding area are unlikely to support any notable species.

8.5.8 There is a possibility that common species of bat forage in the surrounding residential areas and along the London Overground rail corridor. However, the Proposed Development will be confined to the area already occupied by buildings and hardstanding and is unlikely to result in any significant loss of foraging habitat.

8.5.9 Overall, both Sites have low ecological value and most habitats in the surrounding area (with the exception of the rail corridor) are also of low ecological value. However, the Sites lie adjacent to the rail corridor SINC and residential areas with a relatively large number or mature and semi-mature trees and amenity planting. These provide habitats for a range of common birds and invertebrates and a foraging area for common species of bat.

8.5.10 No trees on either of the Sites requires safeguarding for their intrinsic nature conservation value. However, some of all of the most mature trees will be retained, where possible, as they provide foraging areas and stepping stones for common species of bird and bats.

8.5.11 In view of the above, the design of the Proposed Development and the associated landscape design will make the most of the ecological corridor provided by the London Overground railway line and will concentrate landscaping in the southern part of Site A and northern part of Site B.

8.5.12 In conclusion, it is considered unlikely that there will be any significant effects in relation to ecology, as a result of the Proposed Development. Therefore, it is proposed to scope this topic out of the EIA. **Appendix C** presents the PEA, which evaluates and summarises the findings of the desk-based study and field based ecological assessment of the Site.

8.5.13 A Biodiversity Net Gain assessment will also be submitted as part of the planning application, that will detail the net gain position as a result of the Proposed Development.

8.6 Electronic Interference

8.6.1 Terrestrial television (TV) signals, known as 'Freeview', are provided to the area of Proposed Development by the Crystal Palace Transmitter, located approximately 13.4 km to the south-east of the Sites.

8.6.2 Radio waves in the Site area are also transmitted by the BT Tower transmitter (situated approximately 2 km to the south-west of the Sites).

8.6.3 Tall buildings have the potential to cause disruption to the reception of electromagnetic waves, relating to terrestrial TV, radio signals and mobile reception.

8.6.4 Disruption to TV is more likely than disruption to radio, as TV receiving reception is limited to fixed locations, such as aerials, whereas radios and mobiles can be moved to optimise reception. Radios can also receive both analogue and digital signals that have been reflected off buildings, enabling them to work in urban environments. Consequently, it is considered the Proposed Development will cause no significant risk to radio reception.

8.6.5 TV signals can be disrupted when 'blocked' by buildings or other structures, which absorb and weaken the signal. Tall or more densely packed buildings provide a greater risk of blocking these signals to receptors within the surrounding area, as they cast larger 'transmission shadows'. The maximum building height of the Proposed Development is currently envisaged as up to 24 storeys on Site B. Buildings would be situated at different angles to provide spaces between blocks, allowing TV signals to pass through. Any remaining transmission shadow would be slim and cast to the north-west of the Proposed Development located on Site B, onto the Proposed Development located on Site A. However, the design of the Proposed Development will be such that there are no significant effects on TV signals. Subsequently, there is not anticipated to be any disruption to TV transmissions.

8.6.6 The Proposed Development is considered unlikely to have any significant effects on electronic interference and, therefore, it is proposed to scope this topic out of the EIA.

8.7 Human Health

8.7.1 The borough of Camden presents a mixed health profile when compared to London and national averages. Life expectancy at birth for men in Camden is 82.1 years and 86.1 years for women (2018-2020, Office for National Statistics - Life Expectancy Statistics), which is higher than both London (80.9 and 84.7 years) and England (79.4 and 83.1 years) averages.

8.7.2 The borough experiences lower rates of obesity than the London average, with 54.3% of adults classified as overweight or obese compared to the London average of 55.7%. However, Camden faces challenges with income deprivation, with 27.4% of children living in low-income families compared to the England average of 17% (Public Health England, Local Authority Health Profiles 2022).

8.7.3 Camden's health profile shows that 19.8% of residents report having a long-term illness or disability that limits their day-to-day activities. Mental health is a significant concern, with 12.3% of adults diagnosed with depression. The

borough is served by several healthcare facilities, including University College Hospital and the Royal Free Hospital, along with numerous GP practices maintaining an average patient-to-GP ratio of 1,800:1.

8.7.4 The borough benefits from approximately 69 hectares of public open space, including Regent's Park and Primrose Hill. There are 27 children's play areas and 12 sports facilities, including leisure centres at Swiss Cottage and Kentish Town. Community infrastructure includes 9 libraries, 6 community centres, and various faith facilities distributed across the borough.

8.7.5 Those who will experience changes in health as a result of the Proposed Development (i.e. sensitive receptors) include vulnerable groups of the general population (i.e. older people, people with disabilities, communities experiencing deprivation etc.). The general population will include future residents and users of the Sites, demolition and construction workers, and operational or maintenance workers. Key sensitive receptors include:

- Existing residential properties along Camley Street, Agar Grove, Wrotham Road, Hazelbury Way, Barker Drive and Weavers Way;
- Users of nearby public spaces and facilities, including Camley Street Natural Park, St Pancras Gardens, Agar Children's Centre, Maiden Lane Community Centre, and local sports facilities;
- Demolition and construction workers;
- Future residents and users of the Proposed Development; and
- Future operational or maintenance workers of the Proposed Development.

8.7.6 The potential health effects during demolition and construction include:

- Respiratory health impacts from construction dust and vehicle emissions;
- Sleep disturbance and stress from construction noise and vibration;
- Mental health impacts from reduced amenity and disrupted access to local facilities;
- Physical health and safety risks to construction workers and nearby residents;
- Potential impacts on wellbeing from reduced air quality and increased traffic; and
- Temporary impacts on community cohesion from construction activities.

8.7.7 The potential health impacts during demolition and construction will be effectively managed through standard mitigation measures detailed in the CEMP. These measures will address:

- Dust and air quality management;

- Construction noise and vibration control;
- Traffic management and maintaining access; and
- Site security and safety.

8.7.8 The potential health effects during operation include:

- Physical health impacts from changes in activity levels and lifestyle, influenced by the development's active travel infrastructure, communal spaces, and public realm design. The provision of new residential accommodation meeting modern standards could positively affect resident wellbeing through improved living conditions. Mental health outcomes may be influenced by access to social interaction spaces and employment opportunities across the mixed-use development's retail, office, life science, light industrial, and creative spaces.
- The operational phase could affect local environmental conditions through changes in traffic patterns and building operations, potentially impacting air quality and noise levels for both new and existing residents. Community wellbeing and social cohesion may be affected by the integration of new shared spaces and facilities, while the introduction of approximately 350 new residential dwellings could influence local healthcare service capacity.

8.7.9 The Proposed Development will incorporate various design features and operational considerations that will positively influence health outcomes, including (but not limited to):

- Provision of high-quality residential accommodation meeting modern standards;
- Creation of employment opportunities through mixed-use development;
- Integration of active travel infrastructure; and
- Inclusion of communal and public spaces promoting social interaction.

8.7.10 Whilst the Institute of Environmental Management and Assessment's (IEMA's) Guide to Determining Significance for Human Health in Environmental Impact Assessment (2022) highlights that there could be a range of sensitivities within sub-populations, with some more vulnerable and less able to deal with changes (for example, being more sensitive than others), it is considered that the population and sub-populations anticipated to be affected by the Proposed Development are unlikely to have an increased sensitivity to health impacts. Consequently, a low sensitivity of receptor is assumed.

8.7.11 Further to the above, it is considered that the Proposed Development will have a low magnitude of impact on elements, such as (but not limited to) risk taking behaviour, air quality, water quality or availability and land quality, as the use of

a CEMP would reduce risk-taking behaviour and potential adverse effects on air, water and land quality during the demolition and construction of the Proposed Development.

8.7.12 In line with the generic indicative significance matrix presented in IEMA's Guide to Determining Signifincance in Human health in Environmental Impact Assessment, it is considered that the Proposed Development would not result in any likely significant effects beyond those already proposed to be assessed in the socio-economics, noise and vibration, and air quality chapters proposed to be included in the ES. Although beneficial effects would likely be realised as a result of the Proposed Development, these would be considered to be minor and not significant. Therefore, human health is proposed to be scoped out of the EIA.

8.7.13 A standalone Health Impact Assessment (HIA) will be submitted as part of the planning application.

8.7.14 The approach to scope out human health from the ES chapter is considered to be suitable and is supported by:

- The nature and scale of the Proposed Development, which primarily delivers beneficial outcomes through housing provision and employment opportunities.
- The comprehensive assessment of related environmental factors (socio-economics, air quality and noise and vibration) within their respective ES chapters, which will address potential health pathways.
- The submission of a standalone HIA, which will provide a focused assessment of health considerations and opportunities for health enhancement.

8.8 Materials and Waste

8.8.1 The Proposed Development will give rise to a small amount of removed waste (associated with the demolition of existing buildings), construction waste (from excavation and wastage of construction materials) and operational waste.

8.8.2 The Site is not located in, or adjacent to, any allocated materials.

8.8.3 The details of measures embedded within the design of the Proposed Development to reduce the use of materials and generation of waste will be submitted as part of the planning application.

8.8.4 In accordance with the principles of the Waste Management Plan for England (2013) and the National Planning Policy for Waste (2014), a principal aim during construction will be to reduce the amounts of waste which is generated and exported from the Site. This will include measures such as 'just in time'

deliveries, the secure storage of materials and prevention of stockpiling to minimise the potential for waste. This approach complies with managing waste towards the higher end of the Waste Hierarchy, where the intention is first to prevent, reuse, recycle and as a last resort, to dispose of waste off-site as necessary. All relevant construction contractors will be required to investigate opportunities to minimise and reduce waste generation in line with Waste and Resources Action Programme (WRAP's) 'Halving Waste to Landfill' initiative.

8.8.5 The requirement for Site Waste Management Plans was revoked on 1st December 2013; however, it is considered best practice to produce a Construction Resource Management Plan (CRMP). The CRMP outlines the ways in which the Waste Hierarchy will be adhered to and waste will be managed during excavation and construction of the Proposed Development in order to avoid environmental impacts. The CRMP will be prepared during the post-planning phase, once the necessary details concerning excavation and construction are known (such as the detailed construction programme, details of appointed contractors and details of proposed construction methods). Chapter 5 of the ES will include details regarding construction waste associated with the Proposed Development.

8.8.6 An Operational Waste Management Strategy will be prepared to support the planning application. The Operational Waste Management Strategy will outline the relevant legislation and national (England), regional (London), district (LBC) waste policy and guidance and how compliance with these requirements will be achieved for the Proposed Development. Consultation will be held with the LBC during the preparation of the Operational Waste Management Strategy.

8.8.7 With regards to materials, there is not anticipated to be any significant issues in terms of availability of materials required for the Proposed Development. The Proposed Development will comprise a high number of sustainable features and construction methods. Subsequently, there are not anticipated to be any significant effects on materials from the Proposed Development.

8.8.8 With the mitigation measures outlined above, the Proposed Development is not anticipated to substantially reduce landfill capacity in the region. The Proposed Development will be compliant with the targets set out in Policy SI7 of the London Plan, which calls for 95% diversion of demolition, construction, and excavation waste from landfill. Responsibility for residential waste management lies with the LBC, and it is assumed that the LBC will achieve or exceed the municipal waste recycling target of 65%. IEMA guidance identifies a landfill diversion rate of 60% as a threshold for impacts of a minor magnitude. It is, therefore, unlikely that significant effects due to demolition and construction or operational waste would be identified.

8.8.9 Based on the above, as there are not anticipated to be any likely significant effects materials and waste as a result of the demolition and construction, and operation, of the Proposed Development, it is proposed to scope this topic out of the EIA.

8.9 Major Accidents and / or Natural Disasters

8.9.1 Under Schedule 3 of the EIA Regulations, the risks of major accidents and natural disasters relevant to the Proposed Development need to be considered.

8.9.2 As a life sciences-led, mixed-used development, the Proposed Development could be a source of hazard that could result in a major accident or disaster during operation. However, control measures already exist to avoid, manage and respond to potential major accidents or disasters[64]. These measures include London Ambulance Service's (LAS's) Hazardous Areas Response Team (HART), which is a specialist team of LAS's staff who have been trained to provide life-saving medical care in complex and challenging environments, such as industrial accidents and natural disasters. There are also specific laws and regulations intended to avoid or manage the potential causes of major accidents or natural disasters. Therefore, it is considered that there are measures to eliminate the risk of major accidents or disasters as a result of the operation of the Proposed Development.

8.9.3 Measures to eliminate the risk of major accidents of disasters as a result of the demolition and construction of the Proposed Development will be outlined in a CEMP.

8.9.4 A review has been undertaken of potential sources of hazard in the surrounding area, that have the potential to interact with the Proposed Development.

8.9.5 As described in **Section 8.4: Ground Conditions and Contamination**, risks from ground contamination are unlikely to be considered significant and, as described in **Section 8.10: Water Resources and Flood Risk**, adverse changes to water resources and surface water flooding are unlikely to be considered significant.

8.9.6 No structural, geomorphological or geochemical features are recorded on or near the Site by British Geological Survey (BGS) mapping. There are no Health and Safety Executive (HSE) Control of Major Accident Hazards (COMAH) sites in close proximity to the Site.

[64] https://www.london.gov.uk/sites/default/files/london_risk_register_version_11.pdf

8.9.7 The Zetica bomb maps[65] show the Site to be in a low-to-medium risk area for unexploded ordnance (UXO); however, as described in **Section 8.4: Ground Conditions and Contamination**, as a result of the Phase 1 Desk Study that was undertaken in May 2023, it was recommended that a detailed UXO risk assessment be completed. Therefore, no further consideration of UXO risk is considered necessary.

8.9.8 Any increased risk of major accidents or disasters as a result of climate change will be addressed in the Climate Change Mitigation and Adaptation chapter of the ES.

8.9.9 It is considered that existing design measures and standard practice will adequately control any potential major accidents and / or disasters; therefore, it is proposed to scope this topic out of the EIA.

8.10 Water Resources and Flood Risk

8.10.1 Both Sites are located in Flood Zone 1 (areas with a low probability of flooding). There are no ponds, streams or drainage ditches on or adjacent to the Sites. There are no known records of groundwater abstraction within the vicinity of the Sites. At this initial stage it is considered there is a low risk of flooding from all other sources of flooding, including but not limited to surface water, from canals, groundwater, sewer and highway drainage sources. This will, however, be further assessed in a Flood Risk Assessment, to be submitted as part of a planning application.

8.10.2 There are no watercourses on the Sites; the closest watercourse is the River Thames, which is located approximately 3.4 km to the south-east of the Sites, at the closest point.

8.10.3 During demolition and construction, there is the potential for increased flood risk from temporary increased surface water runoff into the sewers and from silt laden runoff entering the sewers, resulting in sedimentation and pollution of the sewer network. For the Proposed Development, measures to prevent and control any silt laden runoff and accidental spillages (e.g. of fuels or chemicals) will be managed through a CEMP. The CEMP will include measures such as, but not limited to: the installation of attenuation tanks and pipework as early as possible within the programme, to provide adequate attenuation volume on-site during demolition and construction works; all runoff passing through a filter system, silt buster bags or similar, prior to discharge; any fuels and chemicals on-site are to be stored in locked bunded containers, located

[65] https://zeticauxo.com/downloads-and-resources/risk-maps/

away from discharge points; drip trays utilised when refilling plant on-site, with spill kits present during refuelling; and regular toolbox talks held on spill kit usage and refuelling procedures. With these mitigation measures in place, there is unlikely to be any significant impact on the local sewer network.

8.10.4 For the completed Proposed Development, any potential car parks will be fitted with interceptors, to prevent quantities of fuels / hydrocarbons entering the drainage network.

8.10.5 The Sites are located within Flood Zone 1 (low risk of flooding), although due to the size of the Sites, it is expected that a Flood Risk Assessment will be produced to support the applications, that will take into account the LBC's Strategic Flood Risk Assessment (SFRA). The risk of flooding from surface water flooding, sewers and artificial drainage bodies is negligible to low for both Sites, even taking into account an allowance for climate change, though it should be noted that there is a small area in the south-west of Site A which has a low to high risk of surface water flooding. Nevertheless, the below listed mitigating measures will ensure that the risk of flooding from the Site is kept low.

8.10.6 It is anticipated that the Proposed Development will lead to an increase in surface water runoff. However, Site drainage and surface water run-off will be managed to meet appropriate standards of attenuation, and it is anticipated that the design of the Proposed Development will improve the current situation. A Sustainable Urban Drainage Systems (SuDS) strategy will be prepared to accompany the planning applications. The SuDS strategy will identify any surface water drainage mitigation measures necessary, and they will be included as part of the Proposed Development. These measures may include, but not limited to; flow control devices installed within the drainage system to limit discharge rates from Site; permeable paving with attenuation storage in permeable sub-bases; external landscaping features such as swales, rain gardens, and tree pits to store surface water and use for irrigation and to provide biodiversity gain.

8.10.7 It is anticipated that the Proposed Development will lead to an increase in potable water usage and foul water discharges from the Site, due to its intensification. Operational water usage will be minimised by the provision of features such as low flow taps, and rainwater harvesting will be considered. The SuDS strategy will outline any augmentation to the existing sewer infrastructure required.

8.10.8 Taking into consideration the above, the Proposed Development is considered unlikely to have significant effects with regards to water resources and flood risk. Therefore, it is proposed to scope this topic out of the EIA.

8.10.9 A Flood Risk Assessment & Drainage Strategy report will be submitted as part of the planning applications.

9. Proposed Structure of the Environmental Statement

9.1 Structure of the Assessment Chapters

9.1.1 The proposed structure for the individual technical assessment chapters is as follows:

- Scope of Assessment;
- Key Legislation, Policy and Guidance Considerations;
  - Legislation and Regulations;
  - Planning Policy;
  - Technical Standards and Guidance;
- Assessment Methodology;
  - Determination of the Baseline;
  - Prediction Methodology;
  - Limitations and Assumptions;
- Baseline Assessment and Identification of Key Receptors;
  - Baseline Assessment;
  - Conclusions Regarding Baseline Environmental Quality and Key Receptors;
- Identification and Description of Changes Likely to Generate Effects;
  - Demolition and Construction Phase;
  - Operational Phase;
- Assessment of Likely Significant Effect;
  - Embedded Demolition and Construction Mitigation Measures;
  - Anticipated Effects During the Demolition and Construction Phase;
  - Embedded Operational Mitigation Measures;
  - Anticipated Effects During the Operational Phase;
- Scope for Additional Mitigation Measures;
  - Potential Additional Mitigation Measures;
  - Likely Effectiveness of Additional Mitigation Measures;
- Residual Effects;

- Significant Residual Effects;
- Cumulative Effects; and
- Summary and Conclusion

9.2 Structure of the ES

9.2.1 The ES will comprise the following set of documents:

- ES Volume 1: Non-Technical Summary NTS: this document will provide a clear and concise summary of the Proposed Development, alternative designs that were considered, environmental impacts and mitigation measures;
- ES: Volume 2: Main Text: this will contain the main body of the EIA with the proposed chapter headings as set out below;
- ES Volume 3: Heritage, Townscape and Visual Impact Assessment (HTVIA): the methodology and findings of the TVIA accompanied by a full set of views and verified images; and
- ES Volume 4: Technical Appendices: these will provide supplementary details of the environmental studies conducted during the EIA including relevant data tables, figures and photographs.

9.2.2 It is currently envisaged that the ES Volume 2: Main Text will be structured with the following chapter headings:

- Chapter 1: Introduction;
- Chapter 2: The Site;
- Chapter 3: EIA Methodology;
- Chapter 4: Alternatives Considered and Design Evolution;
- Chapter 5: The Proposed Development and Demolition and Construction Overview;
- Chapter 6: Transport;
- Chapter 7: Socio Economics;
- Chapter 8: Air Quality;
- Chapter 9: Noise and Vibration;
- Chapter 10: Wind Microclimate;
- Chapter 11: Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare;
- Chapter 12: Climate Change Mitigation and Adaptation;

- Chapter 13: Effect Interactions; and
- Chapter 14: Residual Effects and Conclusions.

9.2.3 There will also be the following related standalone documents submitted as part of the planning application:

- Design and Access Statement;
- Planning Statement;
- Statement of Community Involvement;
- Affordable Housing Statement;
- Arboricultural Impact Assessment;
- Preliminary Ecological Appraisal (PEA);
- Biodiversity Net Gain Assessment;
- Phase 1 Desk Study;
- Health Impact Assessment;
- Flood Risk Assessment and Drainage Strategy Report;
- Energy and Sustainability Statement;
- Transport Assessment;
- Circular Economy Statement; and
- Whole Life Carbon Assessment.

10. Conclusion

10.1.1 This report requests a Scoping Opinion from the LBC, pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

10.1.2 The LBC and consultees are invited to consider the contents of this report and comments accordingly within the five-week period prescribed by the EIA Regulations.

Appendices

- Appendix A: Archaeological Desk Based Assessment
- Appendix B: Phase 1 Desk Study
- Appendix C: Preliminary Ecological Appraisal

Appendix A: Archaeological Desk-Based Assessment

Camley Street, Kings Cross, London Borough of Camden

Archaeological Desk-Based Assessment

Document Ref.: 281160.01
July 2023

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1	26.06.2023	TP	MK Marie Kelleher
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Contents

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Plates

Summary

Wessex Archaeology was commissioned by Camden Council to prepare an Archaeological Desk-Based Assessment of land at Camley Street, Kings Cross, London Borough of Camden centred on NGR 529677, 184085. This study is intended to inform a planning application for a proposed residential development within the site.

The aims of this study were to assess the known and potential archaeological resource within the site and the surrounding area, and to assess the likely impacts of the development proposals on this resource.

The effect of the development proposals on the archaeological resource will be a material consideration in the determination of the planning application. This study has identified no overriding archaeological constraints which are likely to prohibit development.

This assessment has established that there is an archaeological interest within the site. This is defined as potential for remains of the 19th century goods shed in the southern half of the southern parcel. The remains likely to be encountered would be associated with the shed's former foundations together with material culture associated with the operational use of the depot.

The site also has broad potential for prehistoric archaeology inferred from its proximity to the former course of the River Fleet. Evidence of settlement and use of the river during the period has been found in the upper and lower courses of the former river.

Any adverse impact to buried archaeological features as a result of the implementation of the development proposals would be permanent and irreversible in nature. This potential adverse effect could be reduced through the implementation of an appropriate scheme of archaeological mitigation, in accordance with national and local planning policy.

The presence, location and significance of any buried archaeological remains within the site cannot currently be confirmed on the basis of the available information as the site itself has not previously been the subject of any form of archaeological investigation. Further archaeological investigation may be required by the archaeological advisor for the Local Planning Authority. The need for, scale and scope of any further archaeological works should be agreed through consultation with the statutory authorities.

Acknowledgements

This project was commissioned by Faithful + Gould on behalf of Camden Council and Wessex Archaeology is grateful to them in this regard. Wessex Archaeology would also like to thank the Greater London Historic Environment Record for supplying the Historic Environment Record data.

Camley Street, Kings Cross, London Borough of Camden

Archaeological Desk-Based Assessment

1 INTRODUCTION

1.1 Project background

1.1.1 Wessex Archaeology was commissioned by Faithful +Gould, on behalf of Camden Council (the client), to prepare an Archaeological Desk-Based Assessment of land at Camley Street, Kings Cross, London Borough of Camden (hereafter 'the Site', **Figure 1**), centred on NGR 529677, 184085.

1.1.2 This study will inform a planning application for a proposed residential and commercial development with community facilities within the Site, to be submitted to Camden Council.

1.2 The Site

1.2.1 The Site comprises two parcels of land, referred to individually as 'Site A' and 'Site B' but collectively as 'the Site'. Site A is the northernmost parcel which is triangular in shape and covers an area of 0.48 ha. Site A is currently occupied by a series of single storey warehouse buildings with areas for storage and parking (**Plates 1** and **2**). Site A is separated from Site B by a bridge carrying the railway tracks over the top of Camley Street. Site B lies to the south of the tracks and is a sub-rectangular area measuring approximately 1 ha. Site B is occupied by the Cedar Way Industrial Estate which consists of one and two storey warehouses, areas for parking, storage, roads and grass verge (**Plates 3**-**5**).

1.2.2 The Site is bound by Camley Street and a footpath to the west, railway tracks to the east, Agar Grove to the north and commercial businesses to the south. The Site is located 770m to the east of Camden Town, 900m to the north of Kings Cross Railway Station, and 3km north west of the City of London. The Site is situated within a relatively flat area of land at an elevation of approximately 29–31m OD within Site A and 27-30m aOD within Site B.

1.2.3 The bedrock geology throughout the Site is mapped as the London Clay Formation with no superficial deposits recorded (British Geological Survey, Geology of Britain Viewer).

1.3 Development proposals

1.3.1 Finalised development proposals were unavailable at the time of writing. However, the draft masterplan indicates that the Proposed Development will comprise the construction of 350 new homes up to 23 storeys in height, employment and commercial space and public open spaces.

1.4 Scope of document

1.4.1 This assessment was requested by the Client in order to determine, as far as is possible from existing information, the nature, extent and significance of the archaeological resource within the Site and its environs, and to provide an initial assessment of the potential impact of development on the heritage assets that embody that significance.

1.4.2 The Historic Environment, as defined in the *National Planning Policy Framework* (NPPF 2021): Annex 2, comprises:

'all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.'

1.4.3 NPPF Annex 2 defines a Heritage Asset as:

'a building monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).'

1.5 Aims

1.5.1 The specific aims of this assessment are to:

- outline the known and potential heritage assets within the Site based on a review of existing information within a defined study area;
- assess the significance of known and potential heritage assets through weighted consideration of their valued components;
- make recommendations for strategies to mitigate potential adverse impacts arising from the proposed development.

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Plate 1) View from the southwest corner of Site A, facing northeast

Plate 2) View from the southern section of Site A, facing south

Plate 3) View from Camley Street facing northeast towards Site B

Plate 4) View from the southeast corner of Site B, facing north

Plate 5) View from the northern end of Cedar Way, facing south

Plate 6) View of the warehouse located in the northwest corner of Site B

2 PLANNING BACKGROUND

2.1 Introduction

2.1.1 There is national legislation and guidance relating to the protection of, and proposed development on or near, important archaeological sites or historical buildings within planning regulations as defined under the provisions of the *Town and Country Planning Act 1990*. In addition, local authorities are responsible for the protection of the historic environment within the planning system.

2.1.2 The following section summarises the main components of the national and local planning and legislative framework governing the treatment of the historic environment within the planning process. Further detail is presented in **Appendix 2**.

2.2 Designated heritage assets

2.2.1 A designated heritage assets is defined in NPPF Annex 2 as:

'A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.'

2.2.2 Statutory protection is provided to certain classes of designated heritage asset under the following legislation:

- *Planning (Listed Buildings and Conservation Areas) Act 1990;*
- *Ancient Monuments and Archaeological Areas Act 1979; and*
- *Protection of Wrecks Act 1973*

2.2.3 The *Historic Buildings and Ancient Monuments Act 1953* makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

2.2.4 The United Nations Educational, Scientific and Cultural Organisation (UNESCO) World Heritage Committee inscribes World Heritage Sites for their Outstanding Universal Value (OUV); 'cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity'. The United Kingdom is a signatory of the *UNESCO Convention Concerning the Protection of the World Cultural and National Heritage 1972*. England protects its World Heritage Sites and their settings, through the statutory designation process and through the planning system.

2.2.5 Further information regarding heritage designations is provided in **Appendix 2**.

2.3 National Planning Policy Framework

2.3.1 The *National Planning Policy Framework* (NPPF) was published in July 2021 and sets out the government's planning policies for England and how these are expected to be applied.

2.3.2 Section 16 of the NPPF, entitled *Conserving and enhancing the historic environment*, sets out the principal national guidance on the importance, management and safeguarding of heritage assets within the planning process.

2.3.3 The aim of NPPF Section 16 is to ensure that Local Planning Authorities, developers and owners of heritage assets adopt a consistent and holistic approach to their conservation and to reduce complexity in planning policy relating to proposals that affect them.

2.3.4 To summarise, government guidance provides a framework which:

- recognises that heritage assets are an irreplaceable resource;
- requires applicants to provide proportionate information on the significance of heritage assets affected by the proposals and an impact assessment of the proposed development on that significance;
- takes into account the desirability of sustaining and enhancing the significance of heritage assets and their setting;
- places weight on the conservation of designated heritage assets, in line with their significance; and
- requires developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and impact, and to make this evidence (and any archive generated) publicly accessible.

2.3.5 A selection of excerpts from NPPF Section 16: Conserving and enhancing the historic environment is presented in **Appendix 2**.

2.3.6 Further additional guidance intended to accompany the NPPF is provided in the Planning Practice Guidance (PPG) web-based resource[1].

2.4 Local planning policy and guidance

2.4.1 The Site is situated within the administrative boundaries of Camden Council, which adopted the Camden Local Plan in July 2017.

2.4.2 The Core Strategy forms the basis of the development plan for the district and sets targets for the provision of new housing and employment for a period up to 2031, as well as setting out general policies in relation to provision of facilities, transport, and protection of natural and historic features.

2.4.3 Local planning policies that relate to the historic environment and may be relevant to the proposed development are presented in **Appendix 2**.

3 METHODOLOGY

3.1 Introduction

3.1.1 The methodology employed during this assessment was based upon relevant professional guidance, including the Chartered Institute for Archaeologists' *Standard and guidance for historic environment desk-based assessment* (CIfA 2014, revised 2020).

[1] https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment

3.2 Study Area

3.2.1 A Study Area was established within a 1km radius of the Site boundary. The recorded historic environment resource within the Study Area was considered in order to provide a context for the discussion and interpretation of the known and potential resource within the Site.

3.3 Sources

3.3.1 Several publicly accessible sources of primary and synthesised information were consulted. These comprised:

- the National Heritage List for England (NHLE), which is the only official and up to date database of all nationally designated heritage assets;
- the Greater London Historic Environment Record (GLHER), comprising a database of recorded archaeological sites, find spots, and archaeological events within the county;
- relevant national, regional and thematic Research Frameworks (e.g., A Research Framework for London Archaeology 2002);
- national heritage datasets including the Archaeological Data Service (ADS), Heritage Gateway, OASIS, PastScape and the National Record of the Historic Environment (NRHE) Excavation Index;
- historic manuscripts, surveyed maps, and Ordnance Survey maps held at the London Metropolitan Archive; and
- relevant primary and secondary sources held at the London Metropolitan Archive and in Wessex Archaeology's own library. Both published and unpublished archaeological reports relating to excavations and observations in the vicinity of the Site were studied.

3.3.2 Sources consulted during the preparation of this assessment are listed in the references section of the report.

3.4 Site visit

3.4.1 The Site was visited on 31st May 2023. Weather conditions were dry and overcast. A fieldwork record comprising digital photography is held in the project archive.

3.4.2 The aim of the Site visit was to assess the general aspect, character, condition and setting of the Site and to identify any prior impacts not evident from secondary sources. The Site visit also sought to ascertain if the Site contained any previously unidentified features of archaeological, architectural or historic interest.

3.5 Significance

3.5.1 Significance (for heritage policy) is defined in NPPF Annex 2 as:

'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.'

3.5.2 The interests as listed in the NPPF are further defined in Historic England's (2019) *Statements of Heritage Significance: analysing significance in heritage assets*. These are:

- Archaeological Interest: there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point;

- Architectural and Artistic Interest: these are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture; and

- Historic Interest: An interest in past lives and events (including prehistoric). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

3.5.3 This assessment was also informed by the advice published by Historic England in the document entitled *Managing Significance in Decision-Taking in the Historic Environment: historic environment good practice advice in planning note 2* (2015).

3.6 Assumptions and limitations

3.6.1 Data used to compile this report consists of secondary information derived from a variety of sources, only some of which have been directly examined for the purposes of this Study. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

3.6.2 The records held by the GLHER are not a record of all surviving heritage assets, but a record of the discovery of a wide range of archaeological and historical components of the historic environment. The information held within it is not complete and does not preclude the subsequent discovery of further elements of the historic environment that are, at present, unknown.

3.7 Copyright

3.7.1 This report may contain material that is non-Wessex Archaeology copyright (e.g., Ordnance Survey, British Geological Survey, Crown Copyright), or the intellectual property of third parties, which Wessex Archaeology are able to provide for limited reproduction under the terms of our own copyright licences, but for which copyright itself is non-transferable by Wessex Archaeology. Users remain bound by the conditions of the *Copyright, Designs and Patents Act 1988* with regard to multiple copying and electronic dissemination of the report.

4 BASELINE RESOURCE

4.1 Introduction

4.1.1 The following section provides a summary of the recorded historic environment within the Study Area, compiled from the sources summarised above and detailed in the references section of this report. The aim is to identify the known and potential components of the historic environment (heritage assets) that could be affected by the proposed development.

4.2 Archaeological Priority Areas

4.2.1 The Site does not lie within an Archaeological Priority Area, however there are five areas designated within the Study Area. These comprise;

- Kentish Town, located 560m to the north west of the Site;
- Post-medieval cemeteries, located 510m to the west of the Site;
- St Pancras Old Church and burial ground, located 380m to the south of the Site;
- Regents Canal, Basins and wharves, located 700m to the south east of the Site; and
- Regents Canal and Rail Infrastructure, located 300m to the south east of the Site.

4.2.2 Archaeological Priority Areas represent areas designated for significant known archaeological interest or potential for archaeological remains to be discovered.

4.2.3 Archaeological Priority Areas are shown on **Figure 1**.

4.3 Previous studies

Site

4.3.1 The survey area for the works undertaken for the Channel Tunnel Rail Link (CTRL) partially extend within the north eastern corner of Site B. The survey area covered a much larger area immediately adjacent to the Site boundary extending south to St Pancras Station (160427). The works involved a watching brief on 74 geotechnical investigations and three archaeological trial trenches. Only one of the geotechnical test pits was excavated within the Site, in the north eastern corner of Site B (TP3737). The three trenches were located much further south towards St Pancras Station. The test pit recorded 0.9m of made ground overlying London Clay (Oxford Archaeology 1997).

4.3.2 Further boreholes along the northern and western boundary of the southern parcel completed as part of geotechnical works for CTRL identified London Clay Formation between 0.6 – 1.25 m bgl overlain by made ground deposits in all instances to ground level (TQ28SE1831, TQ28SE1807 and TQ28SE1832). There is no record of any previous geotechnical works within or in the vicinity of the northern parcel.

Study Area

4.3.3 The GLHER contains entries pertaining to a large number of investigations which have been carried out within the Study Area. These include open area excavations, trial trench evaluation and watching brief.

4.3.4 As mentioned above extensive works were undertaken for the CTRL during the 1990s and early 2000s. The phase mentioned above found evidence for medieval farmland related to the village of St Pancras, which was later developed for the Regents Canal and the railway (Oxford Archaeology 1997). In 2002 an area of watching brief was undertaken adjacent to the north eastern corner of the Site (154291), this found a small section of 19th century brickwork.

4.3.5 Where relevant, the results of these investigations are discussed in further detail in **Section 4.4**. Previous archaeological investigations carried out within the Study Area are illustrated in **Figure 2**.

4.4 Archaeological and historical context

4.4.1 The following section summarises the archaeological and historical development of the Site and the Study Area, compiled from the sources listed above. The likelihood of as yet unrecorded archaeological remains within the Site is informed by the consideration of the known heritage assets within the Study Area, in conjunction with the geology and topography of the area.

4.4.2 Records obtained from the NHLE, GLHER and other sources are listed in **Appendix 3** and illustrated in **Figures 2-5**. Historic maps are illustrated in **Figures 6** and **7**.

Prehistoric (970,000 BC–AD 43): Figure 3

4.4.3 The Site is located to the west of the historic route of the River Fleet and lies within its former river valley. The river begins to the north at a series of springs in Hampstead Heath continuing south where it flows into the River Thames. Little is known of how the river was used prior to the Romano-British with Bill McCann even suggesting that the valley had a more ravine like appearance (1989). Though this has never been fully verified.

4.4.4 A plethora of archaeological evidence has been found that indicates the Lower Thames Valley (in which the River Fleet and its own valley resides) has been occupied since the Palaeolithic period by temporary groups of migratory hunter gatherers before it became permanently occupied from the Neolithic period. However, no prehistoric finds or features have been recorded within the Study Area. The closest evidence to the Site was found to the south of St Pancras Station comprising a number of Palaeolithic finds (Historic England 2018).

Romano-British (AD 43–410): Figure 3

4.4.5 Following the Roman invasion of Britain in AD43, the settlement of London, known as *Londinium*, was established on the northern bank of the Thames, approximately 2 km southeast of the Site (MOLA 2000:127). The Thames River served as a convenient water highway for transportation, while London itself became a significant hub connecting several major Roman roads. The initial settlement of London was devastated during Queen Boudicca's revolt in AD60 but was reconstructed in AD61. After its reconstruction, London emerged as the primary political and administrative centre for the province of Britain. However, with the withdrawal of Rome from Britain and the migration of its inhabitants outside the city in the 5th century, London was eventually abandoned.

4.4.6 The earliest documented use of the River Fleet dates back to the Romano-British period, with indications that it was navigable up to Kentish Town during that time (MOLA 2000). The majority of evidence associated with its use is found further downstream close to the mouth of the river. In this area, notable discoveries include a 2nd century temple and one of the earlier water mills found in Europe (ibid). Further upstream, where the river narrows, evidence is limited. Though, this could be a result of a lack of systematic archaeological investigation.

4.4.7 The most prominent archaeological discovery in the Study Area is the remains of a Roman building (**114807**). Found during a watching brief in 2011, 680 m to the south of the Site, the remains include a large piece of early Roman brick and fragments of daub, suggesting a wattle and daub structure existed in this area. Roman bricks and tiles were also recorded as having been seen within the fabric of St Pancras Old Church, suggesting that it may be on the Site of a former Romano-British building (**97449**).

4.4.8 The suspected line of a Roman road is recorded within the Study Area between two monument points (**110783**). The northernmost point is located 790m to the south west of the Site boundary while the southern end is located at Tottenham Court Road. Providing this was a straight route, this would have followed a southeastly alignment.

4.4.9 A Roman tombstone is recorded to have been found within the Study Area in 1842. Three HER points appear to relate to this same tombstone. The first, labelled as **107117**, denotes its location 980 m to the southwest of the Site. The two additional points, identified both as **98683**, suggest alternative locations 215 m and 915 m east of the Site. This tombstone bore a Latin inscription and was dedicated to a soldier of the 20th legion. Notably, in 1920, three coins of Carausius, dating between 287-289 AD, were also found at the same location mentioned in association with **107117** (**109836**).

4.4.10 A possible Romano-British urn made from iron was recorded 850m to the south east of the Site (**99696**). The urn is reported to have contained gold and silver coins of Constantine and was first thought to be associated with the site of a battle of a between Boudica and the Roman army which is purported to have taken place at Kings Cross. However, upon re-evaluating the available evidence, contemporary scholars now believe that the battle actually took place in the Midlands. The urn likely reflects a buried hoard.

Anglo-Saxon (AD 410–1066): Figure 3

4.4.11 Following the Roman Empire's withdrawal from Britain in the 5th century, the southeast experienced a prolonged period of social and economic decline, leading to the abandonment of London by the native population. In the subsequent centuries, various Saxon kings sought power and control over the southeast. By the middle of the 6th century, the East Saxons gained dominance, and a new settlement called Ludenwic was established in the area known today as Covent Garden, situated just outside the original Roman city walls and approximately 1.8 km southeast of the Site (Cowie and Blackmore 2008). However, by the 9th century, Ludenwic was abandoned in favour of a new settlement that had developed within the historic Roman city walls of London. The decision to relocate was largely driven by the persistent Viking raids that posed a threat to the security and stability of Ludenwic.

4.4.12 The Old Parish Church of St Pancras is believed to have originated in the 7th century and as mentioned earlier, it may be situated near the site of an earlier Roman structure. This church is considered one of the oldest Christian places of worship in London, although its physical structure has undergone significant modifications in the 11th and 19th centuries (**148829**). Limited records exist regarding the discovery of remains associated with the church, including a Saxon altar (**137406**).

4.4.13 The churchyard of St Pancras is believed to have been established before the medieval period (**115111**). Historical documents provide accounts of multiple extensions to the churchyard during the 14th, 18th, and 19th centuries. However, in the 1850s, a portion of the churchyard was removed to accommodate the construction of St Pancras Station and the railway lines leading to it. As part of the investigations conducted for CTRL (Channel Tunnel Rail Link), archaeological studies were carried out in the churchyard. These investigations revealed a significant number of burials dating back to the 19th century. No burials from earlier periods were discovered, suggesting the possibility that they were displaced during the earlier disturbance or are located at greater depths within the site.

4.4.14 The medieval village located at St Pancras was centred around St Pancras Old Church. This village is documented in the Domesday Book and was situated within the Hundred of Ossulstone in the County of Middlesex. According to the records, in 1086, the village had a

population of 35 households, placing it among the largest 20% of settlements at that time. However, by the mid-16th century, the village had largely been abandoned, with its residents reportedly relocating to Kentish Town in the north. The exact reasons for the desertion are unclear, but it is believed to have been influenced by recurrent flooding caused by the River Fleet, which flowed through the settlement.

Medieval (AD 1066–1500): Figure 3

4.4.15 The Historic Environment Record includes records for three medieval villages within the Study Area, one at Camden High Street, 660m to the west of the Site (**126332**), another at Kentish Town, 700m to the west of the Site (**140171**) and another at Kings Cross known as the hamlet of Battle Bridge, 830m to the south west of the Site (**136205**).

4.4.16 The villages at Kentish Town and Camden High Street were connected by a medieval road which follows the route of the modern Kentish Town Road up to Highgate Hill (139467). Two medieval public houses are recorded to have existed alongside the route of the road used as stopping places on long journeys to London (**109334** and **99955**).

4.4.17 Further north within the Study Area but still alongside the route of the road a concentration of medieval activity is recorded around the location of the supposed location of a medieval manor house (**115578**), located 860m to the north east of the Site. This was replaced by a medieval farmhouse (**118616**) complete with surrounding moat (**108847**) and drawbridge (**138255**). The farmhouse was later converted into a public house in the post-medieval period known as the Kings Arms. A toll house (**143276**) and pound (**146147**) are also recorded within the vicinity of the former manor house, although these could date to the medieval or post-medieval periods.

4.4.18 Two other medieval roads are recorded within the Study Area. One comprises a short section of road located to the south of the Site, roughly along the route of St Pancras Road, close to St Pancras Old Church and is likely to have served the medieval settlement here (**143859**). The other section of road consists of an extension to the west of this following Crowndale Road (known as Fig Lane at this time) which led to the main road between Camden and Highgate Hill (**122047**).

4.4.19 Medieval features recorded during archaeological investigations within the Study Area comprise a well at 141 Camden High Street, 760m to the west of the Site (**148512**), a medieval hearth was found in 1991 thought to have been associated with Cantelowes Manor, the first workhouse on St Pancras Way (**139805**). In addition, excavations located 650m to the south of the Site identified deposits indicative of long-term waterlogging that likely dated to throughout the medieval period (**129814**).

4.4.20 A rectangular enclosure sketched on a map of Edward Stukeley to the east of Old St Pancras Church is thought to have been a water filled moat of medieval or Roman date (**143889**). Another earthwork is recorded on the same map, located further south. Stukeley thought that this earthwork could be related to the one further north. It is later shown on a map of 1800 referred to as Great Slipfield (**121550**).

4.4.21 The site of St Giles burial ground is represented by **96995** and represents the medieval extension to the earlier burial ground at Old Church St Pancras. This was in use until 1854.

Post-medieval (AD 1500–1800): Figure 4

4.4.22 Historical records and maps from the post-medieval period provide valuable insights into the development of the Study Area. Early accounts depict the Parish of St Pancras, encompassing the Site, as predominantly composed of rural fields with occasional

farmsteads interspersed throughout (Wallard 1878). This description aligns with the 1746 John Rocque London and 10 Miles Round map, which illustrates the presence of St Pancras Church, situated approximately 500 meters south of the Site, surrounded by limited development (**Figure 6A**). The Site itself is depicted as part of a large field.

4.4.23 Within the Study Area, the available post-medieval records mainly pertain to buildings that have since been demolished (**Figure 4**). The primary clusters of these records are located in the southern half of the Study Area, east of St Pancras Station, and in the north western part of the Study Area, encompassing Market Road and its vicinity. The closest post-medieval record to the Site pertains to the discovery of an artefact during archaeological monitoring, located approximately 170 m west of the Site (**117332**).

19th century (AD 1800-1900)and Modern (AD 1900- present day): Figure 5

4.4.24 During the 19th century, the parish of St Pancras underwent significant changes that shaped its development. Initially development was slow and primarily related to minor infill of the villages or development of large houses for those of high status wishing to leave the city. However, the development of the Regent's Canal and the later construction of Euston and King's Cross Stations in the mid-19th century improved transport links and facilitated urban expansion. Residential development followed, with Victorian terraced houses accommodating the growing population of workers. Several large markets and trading hubs were also established, particularly in Camden Town. Many of the former 19th century buildings and markets have been mapped and recorded onto the GLHER (**Figure 5**).

4.4.25 The 1828 map of London by C. & J. Greenwood shows both Site parcels lay within agricultural land used for arable and pastoral purposes, with the southern parcel falling partially within land marked as 'Agers Fields' (**Figure 6B**). To the west was a large house known as Elm Lodge while in all other directions were areas of meadow or arable fields. Elm Lodge was the residence of the Agar family, an important local family who had a significant role in the 19th century development of Camden (discussed below). The map also shows that Camden had begun to expand beyond its historic core with new roads laid out in all directions. The Regent's Canal is also evident to the west and south of the Site.

4.4.26 In 1841, following the death of William Agar, his widow (name unknown), began to lease out small plots within the Agar estate for housing. Over the following years, Agar Town, as it was known, was said to be one of the most destitute slums in London with low-quality housing, lack of infrastructure (including sewage) and poor life expectancy. However, work completed by Denford has shown that this was not the case and that some planning and design had been undertaken (Denford 1995).

4.4.27 The full extent of Agar town is not known. The road Agar Grove which runs broadly east-west, approximately 80 m to the north, is said to mark one of its edges, likely the northernmost extent of the settlement, and that it was concentrated on land north of Regent's Canal. However, it is not clear whether the town covered the entirety of the area or whether it extended as far west as the Site. The town was demolished to make way for the Midlands Railway extension in the 1860s, though some settlement clearance had to occur for the earlier development of the railway line in 1846 (discussed below).

4.4.28 In 1846, Parliamentary approval was granted for The East & West India Docks & Birmingham Junction Railway. It was empowered to construct a railway line from the district of Poplar to Camden Town. Development of the railway begun almost immediately and by 1858 it had extended to cover much of North and Central London.

4.4.29 Simultaneously, during the same period, the Great Northern Railway (GNR) commenced the construction of its own railway line from York to London, with its final stop being Kings Cross Station, which opened in 1850. As part of the GNR's line, a substantial goods shed area was established to the east of the Site, as depicted on Edward Standford's Map of London dating to 1862 (**Figure 6C**). This area was labelled as the 'Coal Depot Basin,' suggesting its primary function was the transportation of coal. The transported coal served multiple purposes, including fuelling the Camden Gas Works located directly to the south, which predominantly operated on coal gas during that era. The principal structure within the area was the main warehouse positioned to the southeast of the Site. This warehouse featured a U-shaped design and had four tracks running into it, facilitating the movement of goods. Other constructions in the vicinity included an engine shed, stables, and additional warehouses to support the operations of the goods depot.

4.4.30 A large warehouse or goods shed is recorded on Edward Standford's Map of London falling partially within the southern parcel of the Site (**Figure 6C**). It is labelled as being used as a coal depot with a large coal yard located to its west. A series of tracks led into the building and terminated at its southern end that connect directly to the main line that ran to Camden Town. As it was located some distance from the gas works it is unlikely to have supplied it with coal and may have been use solely for supplying the railway or local industry. It is difficult to establish from the existing records when precisely it was built, but it would have been sometime between 1846 and 1858.

4.4.31 In addition to the railway developments shown, Stanford's map also shows residential development within the northern parcel of the Site comprising five detached houses (**Figure 6C**). The houses were later demolished to make way for the extension by Midlands Railway (MR) discussed below.

4.4.32 In the 1860s, following the wake of several strategic acquisitions and partnerships with major railway companies, the Midlands Railway made the decision to establish its own central hub with direct access to London. Parliamentary approval was granted for the terminus in 1863 through the successful passing of a Bill. After careful deliberation, the company decided on a site southeast of Camden Town naming the new terminus St Pancras Station, named after St Pancras Parish. The station opened in 1868 along with the Midland Grand Hotel that was built adjacent to the new terminus.

4.4.33 During the 1860s, the GNR made renovations to the depot situated to the east of the Site. The 1875 edition of the Ordnance Survey (OS) map provides a detailed representation of the area, as shown in **Figures 7** and **8**. The large U-shaped building in the southeast was designated as a goods shed, accompanied by newly constructed coal yards and depots to the north, east, and west. An engraving of the depot reveals that the main building consisted of three storeys, featuring a glass staggered ceiling in the central area and a chimney positioned in the northeast corner. The surrounding buildings followed a standard design and were single storey in height. Notably, the locomotive cleaning shed became a prominent addition to the yard, and new lines were established for the storage of carriages and idle trains.

4.4.34 According to the 1875 edition OS map, the MR acquired the smaller yard situated to the west of the GNR depot, which encompassed the building partially within the southern parcel (**Figures 7** and **8**). This building had undergone modifications, transitioning from a coal depot to a goods depot, likely because of MR's intention to facilitate the transportation of commercial goods to the capital. According to the Goad Fire Insurance plan from 1887, the

goods shed served primarily for storing a variety of goods, including beer, wine, and spirits.[2] The plan further illustrates that the roof of the building was constructed using wood, covered in slate, and featured numerous glass rooflights, all supported by iron girders. Additionally, the plan highlights the existence of raised wooden stages along the flanking walls, accompanied by tracks leading into the central area. However, the plan does not provide specific details regarding the main structure's construction material. Considering the design similarities with contemporary structures at the GNR yard, it is reasonable to assume that the main structure was likely built from brick.

4.4.35 Additionally, within the southern parcel, there was a hydraulic accumulator present, alongside the goods shed and railway lines. A hydraulic accumulator functions as a device in hydraulic systems, responsible for storing and regulating fluid pressure. It serves as a reservoir for hydraulic fluid under pressure, enabling energy to be stored and released as required. The purpose of this accumulator would have been to support the operation of ten hydraulic cranes positioned outside, adjacent to the eastern and western walls of the goods shed. A network of pipes would have extended from the hydraulic accumulator to the cranes, providing the necessary pressure to facilitate their usage. These cranes, however, were not in operation for an extended period and were removed by the time the 1894 OS map was produced. Consequently, the hydraulic accumulator likely became redundant after the cranes were taken out of service.

4.4.36 By 1894, significant developments occurred within the southern parcel, including the extension of the goods shed towards the south, resulting in the addition of new offices. The eastern wall of the goods shed was likely modified to accommodate a new external platform, coinciding with the introduction of a new railway line in the area (**Figure 9**). Outside the Site, to the west, reorganization efforts were undertaken, involving the coal yard and associated tracks.

4.4.37 The records of the GLHER largely relate to former industrial sites, mainly focused on the railway, but also include former public service building and community gardens that either still exist or have been built on (**Figure 5**).

4.4.38 Historic mapping dated to the 20th century indicates the Site remained unchanged until the 1990s when a redevelopment project was undertaken, resulting in the construction of the existing buildings that lie within the two parcels. The surrounding area too was relatively unchanged until the 1990s when a major redevelopment program of the yard to the east was completed as part of the Channel Tunnel Railway project. Much of the yard was levelled, though the large goods shed was retained.

4.5 Assessment of archaeological survival and previous impacts

4.5.1 Previous impacts within the Site relate to the development of goods depot and construction of the modern industrial buildings.

4.5.2 Prior impacts resulting from the goods depot are related to the construction of the goods shed, rail tracks and the accumulator.

4.5.3 Beginning with the rail track, their development is likely to have resulted in the lowest level of impacts with 19th century track design using raised compact beds of ballast. The only

[2] https://www.layersoflondon.org/map/overlays/goad-1887

impact that would have occurred from any levelling or grading works that may have been needed to create a level track.

4.5.4 Underground pipes would have run from the accumulator to the cranes located on either side of the goods sheds. This would have required excavation of trenches during the laying of the pipe network to an unspecified depth. However, the level of impact would be localised to the trench and is not expected to have significantly diminished the archaeological potential of the Site.

4.5.5 At present, the overall design of the goods shed that was present in the southern part of the southern parcel is not known. If the goods shed was single storey and employed the standard design used during the 19th century then it would have comprised brick outer walls supported by brick foundations with an internal pillar system supporting the roof, with each pillar positioned on a square brick foundation (Allison 2020). However, if it was of two stories or greater then it would likely have included internal brick load bearing walls (ibid) and required more robust foundations and a greater level of below ground disturbance.

4.5.6 The modern industrial buildings located within the Site include various structures of one or two storey in height. The Site visit confirmed that all buildings appear to be on slab foundations supporting either brick walls or a steel framing. As such, there would have been some ground disturbance during the construction of the foundations. The level of impact is unlikely to have been extensive and may have only resulted in removal of the remains of the 19th century good yard located close to the surface. Though, this cannot be confirmed based on current evidence.

4.5.7 Overall, instances of ground disturbance are likely to have occurred within both parcels through the construction of the goods shed and modern industrial buildings. The level of impact is unknown at this stage as no intrusive surveys have been completed within the Site. No geotechnical information was available to support this assessment.

4.6 Summary of known and potential historic environment resource

4.6.1 The River Fleet served as a focal point for activity during the prehistoric period, offering access to fresh water, natural resources, and food. Archaeological records indicate that most prehistoric activity was concentrated at the river's source on Hampstead Heath, as well as its lower sections where it passed through the City of London and flowed into the River Thames. There is broad potential for prehistoric archaeology to exist within the Site and could include evidence of temporary occupation or permanent settlement.

4.6.2 During the Romano-British and Anglo-Saxon periods, the main focus of activity shifted to the settlement of London, located southeast of the Site. Limited evidence of activity has been found within the Study Area and the likelihood of discovering remains from these periods is unlikely.

4.6.3 The Site is in close proximity to the medieval village of St Pancras, which was situated south of Regent's Canal along Camley Street. The Site would have been within the hinterland of the village and may have been utilised for agricultural purposes as far back as the medieval period. In addition, post-medieval mapping confirms the Site's use as grazing land and for crop cultivation. It is possible that evidence of this use still exists below ground, such as former field boundaries or associated features. However, due to the relatively recent date of these remains, they may have been disturbed by the construction of the 19th-century goods shed and subsequent 20th-century industrial buildings.

4.6.4 Within the southern parcel, there is a possibility that the foundations of the 19th-century goods shed survive along with remains of the hydraulic system that connected to the former accumulator and cranes. Regarding the system, surveys completed to the southeast during the redevelopment of the former Coal Depot Basin identified remains of the hydraulic systems used to power the network of cranes in this area in areas where levelling had taken place suggesting potential for remains to be buried at depth (Halsam and Thompson 2016).

4.6.5 These remains hold the potential to offer valuable information about the shed's architectural design, thus enriching our understanding of the railway heritage in North London. Furthermore, these findings would complement the knowledge gained from previous investigations conducted for High Speed 1 to the east of the Site, creating a more comprehensive picture of the area's history. Additionally, it is worth noting that the Site may contain material artefacts, such as discarded objects, associated with the depot's former workers. These artefacts can provide insights into the lives and activities of those employed at the depot.

4.6.6 The modern industrial buildings located within both parcels are of no heritage significance.

5 POTENTIAL DEVELOPMENT EFFECTS

5.1 Introduction

5.1.1 This section provides an initial assessment of the potential effects of the proposed development in relation the archaeological resource.

5.2 Statement of potential impact

Archaeological remains

5.2.1 The construction of the proposed development is anticipated to entail the following sources of ground disturbance and excavations:

- preliminary site investigation works;
- setting up a secure construction compound within the Site;
- plant movement;
- piling and/or excavation of new foundation trenches;
- installation of services, drainage and other infrastructure;
- establishment of new car parking areas, roads and access points;
- hard landscaping works (levelling, remodelling); and
- soft landscaping and environmental enhancement works, including planting.

5.2.2 The aforementioned works have the potential to result in the damage to or loss of any buried archaeological features which may be present within their footprint. This could in turn result in a total or partial loss of significance of these heritage assets.

5.2.3 Any adverse impact to buried archaeological features would be permanent and irreversible in nature. This potential adverse effect could be reduced through the implementation of an appropriate scheme of archaeological mitigation.

5.2.4 The most destructive elements of the development proposals in terms of below ground archaeology (should any such remains be present within the Site) would be likely to be associated with the excavation of foundations for the new buildings. As designs are currently at an early stage it is unknown as to whether any underground parking or basement levels will be required as part of the development. Should such works be required this could have a widespread effect upon potential buried archaeological remains within the Site, resulting in truncation, damage or removal of archaeological features/deposits.

5.2.5 Activities such as installation of utilities also have the potential to harm archaeological deposits dependent upon the depth of the ground removal required and the depth of the made ground/surviving archaeological horizon within the Site.

5.2.6 Should substantial landscaping or levelling works be required this could also result in widespread truncation of any archaeological remains present within the working areas.

6 CONCLUSIONS

6.1 General

6.1.1 The effect of the development proposals on the known and potential heritage resource will be a material consideration in the determination of the planning application. This study has identified no overriding archaeological constraints which are likely to prohibit development.

6.1.2 This assessment has established that there is an archaeological interest within the Site. This is defined as potential for remains of the 19th century goods shed in the southern half of the southern parcel (Site B). The remains likely to be encountered would be associated with the shed's former foundations together with material culture associated with the operational use of the depot.

6.1.3 The Site also has broad potential for prehistoric archaeology inferred from its proximity to the former course of the River Fleet. Evidence of settlement and use of the river during the period has been found in the upper and lower courses of the former river.

6.1.4 Any adverse impact to buried archaeological features as a result of the implementation of the development proposals would be permanent and irreversible in nature. This potential adverse effect could be reduced through the implementation of an appropriate scheme of archaeological mitigation, in accordance with national and local planning policy.

6.1.5 The presence, location and significance of any buried archaeological remains within the Site cannot currently be confirmed on the basis of the available information as the Site itself has not previously been the subject of any form of archaeological investigation. Further archaeological investigation may be required by the archaeological advisor for the Local Planning Authority. The need for, scale and scope of any further archaeological works should be agreed through consultation with the statutory authorities.

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C. & J. Greenwood 1828 map of London

Edward Stanford's Map of London, 1862

1875 Edition Ordnance Survey map

1916 Edition Ordnance Survey map

1940 Edition Ordnance Survey map

1965 Edition Ordnance Survey map (viewed online)

1991 Edition Ordnance Survey map (viewed online)

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http://www.domesdaymap.co.uk – Domesday survey information

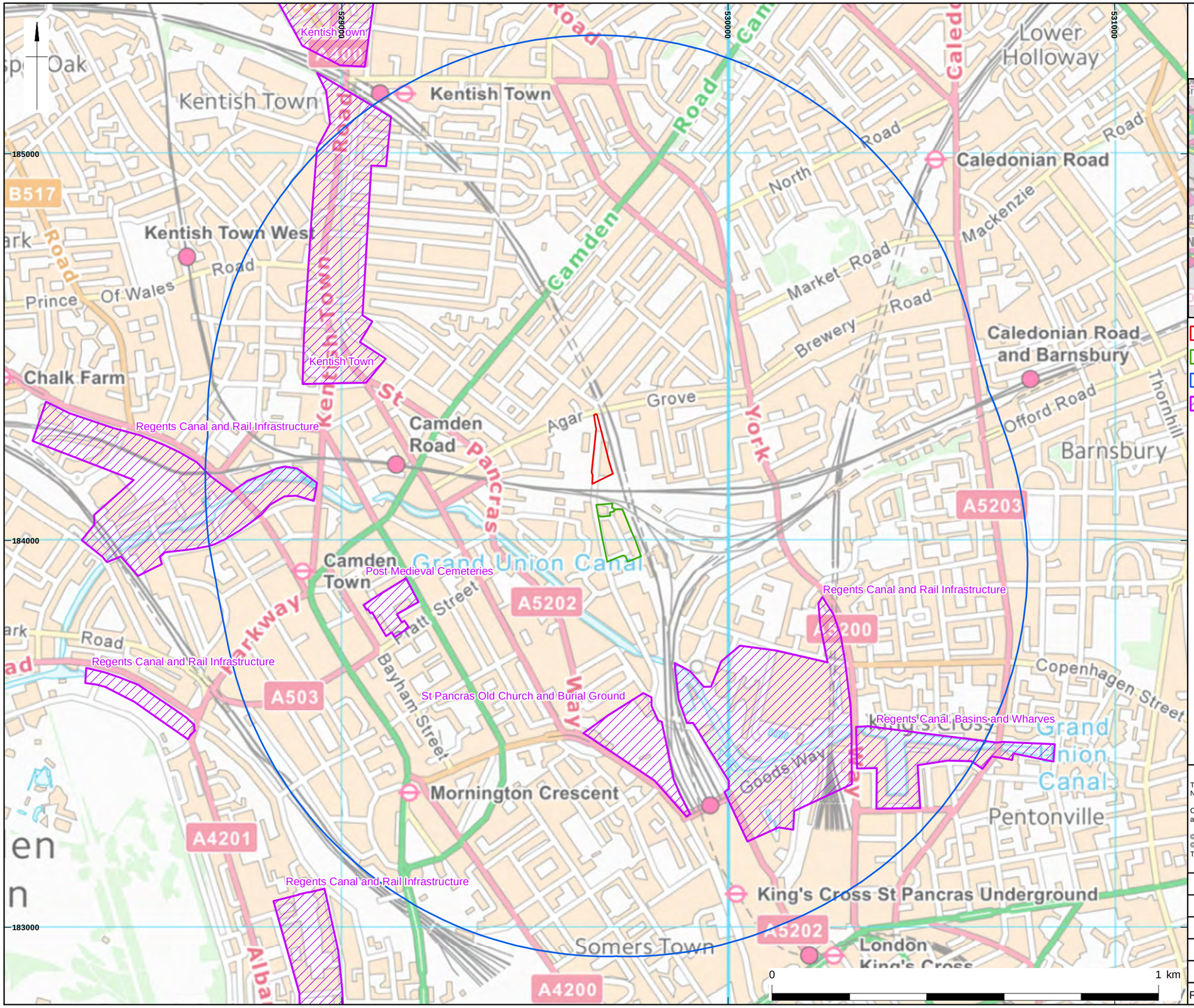
https://opendomesday.org/ – Domesday survey information

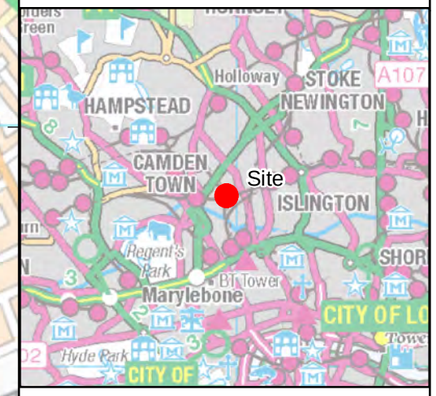
http://www.british-history.ac.uk – documentary resources

http://oasis.ac.uk/england – data on sites, find-spots and excavations

http://www.pastscape.org.uk – data on sites, find-spots and excavations

http://archaeologydataservice.ac.uk/archives/view/romangl/map.html – The Rural Settlement of Roman Britain





Site A (North)

Site B (South)

Study Area (1km)

Archaeological Priority Area

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Illustrator:	Thomas_P
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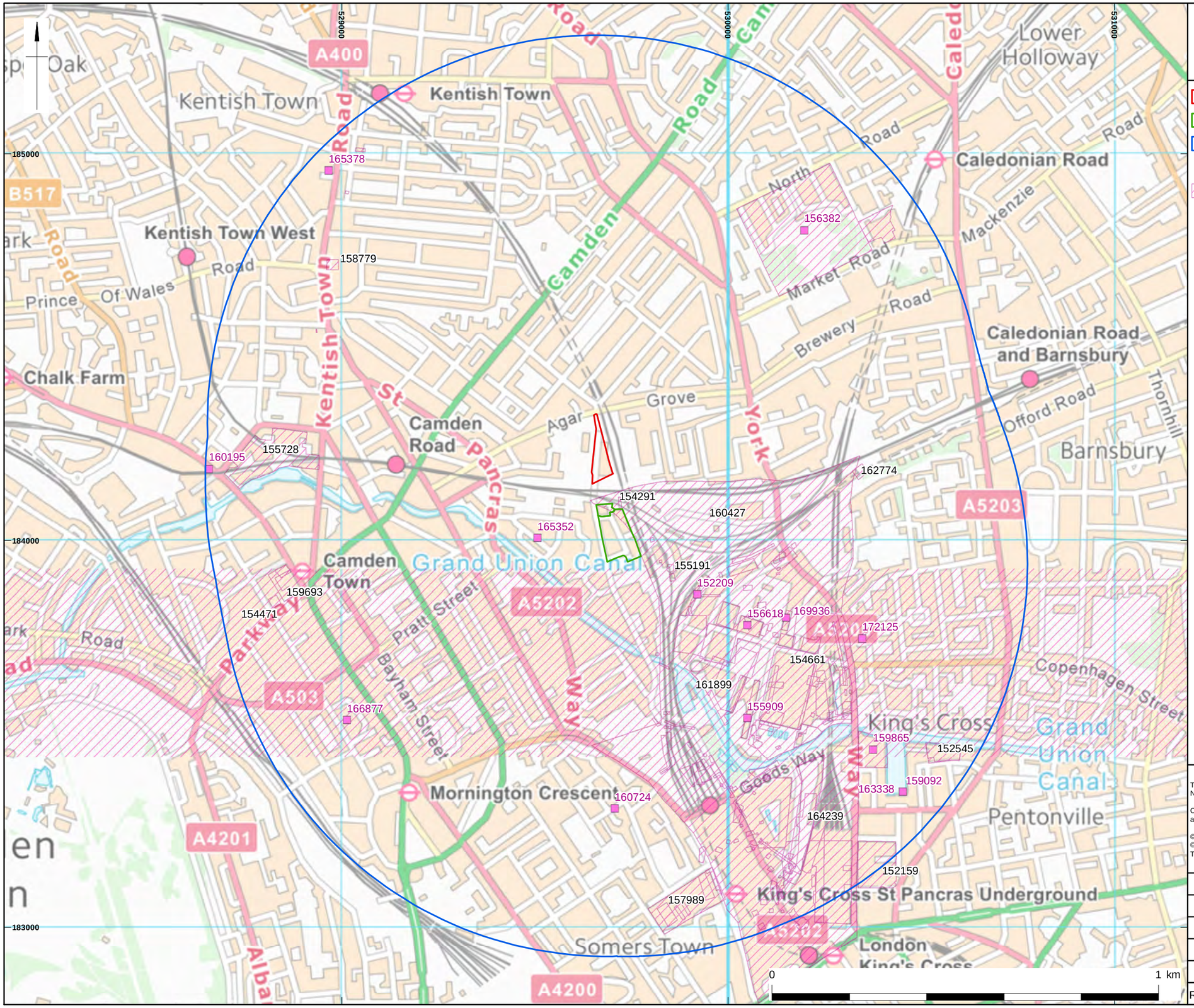
The Site, 1km Study Area and Archaeological Priority Areas

Figure 1



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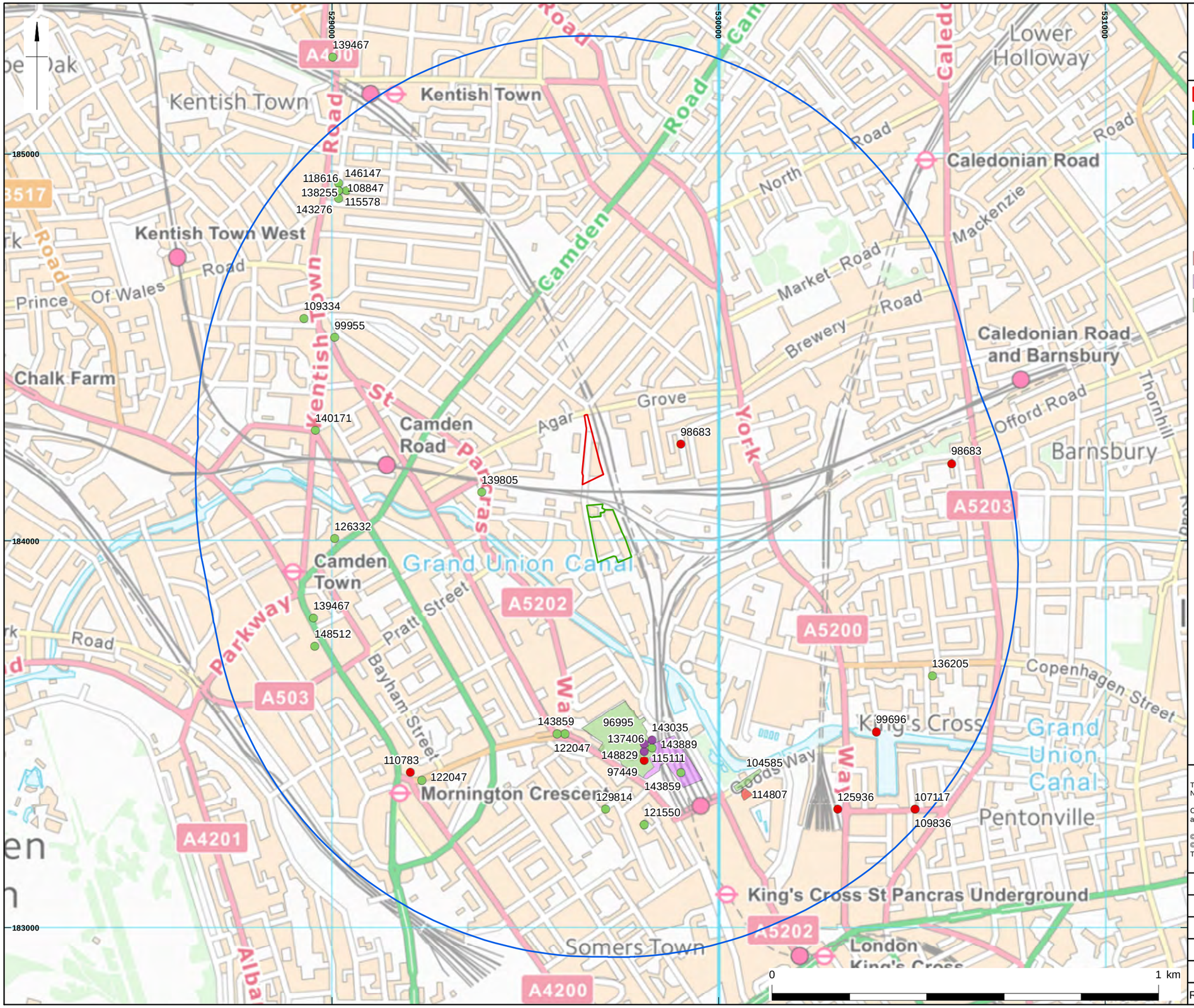
The Site, 1km Study Area and Archaeological Investigations

Figure 2



0 1 km

Site A (North)
Site B (South
Study Area (1km)

Archaeological Records

Romano-British
Anglo-Saxon
Medieval
Romano-British
Anglo-Saxon
Medieval

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Revision Number:	0
Scale:	1:10,000
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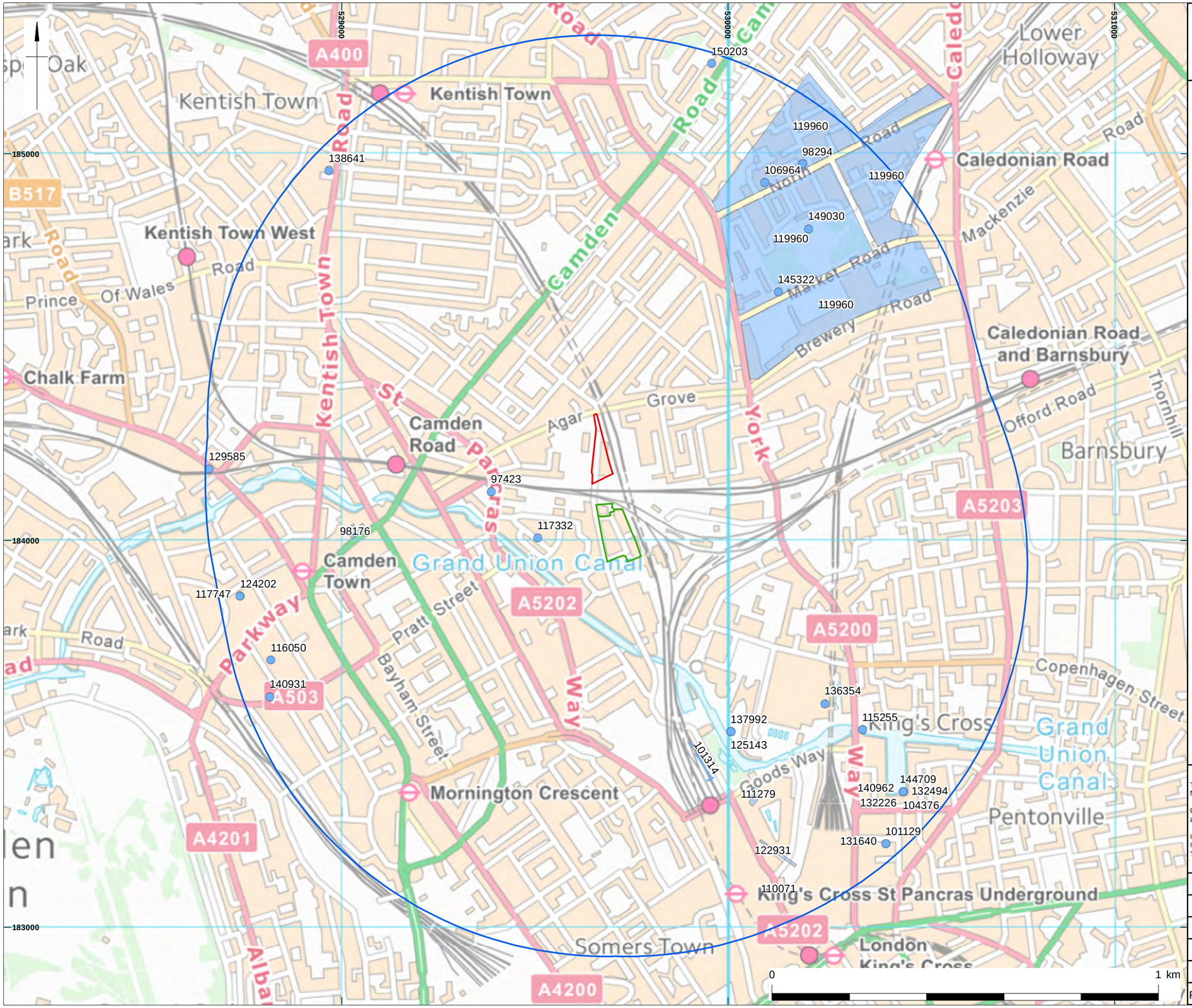
The Site, 1km Study Area and Archaeological Records dating to the Romano-British to Medieval periods

Figure 3



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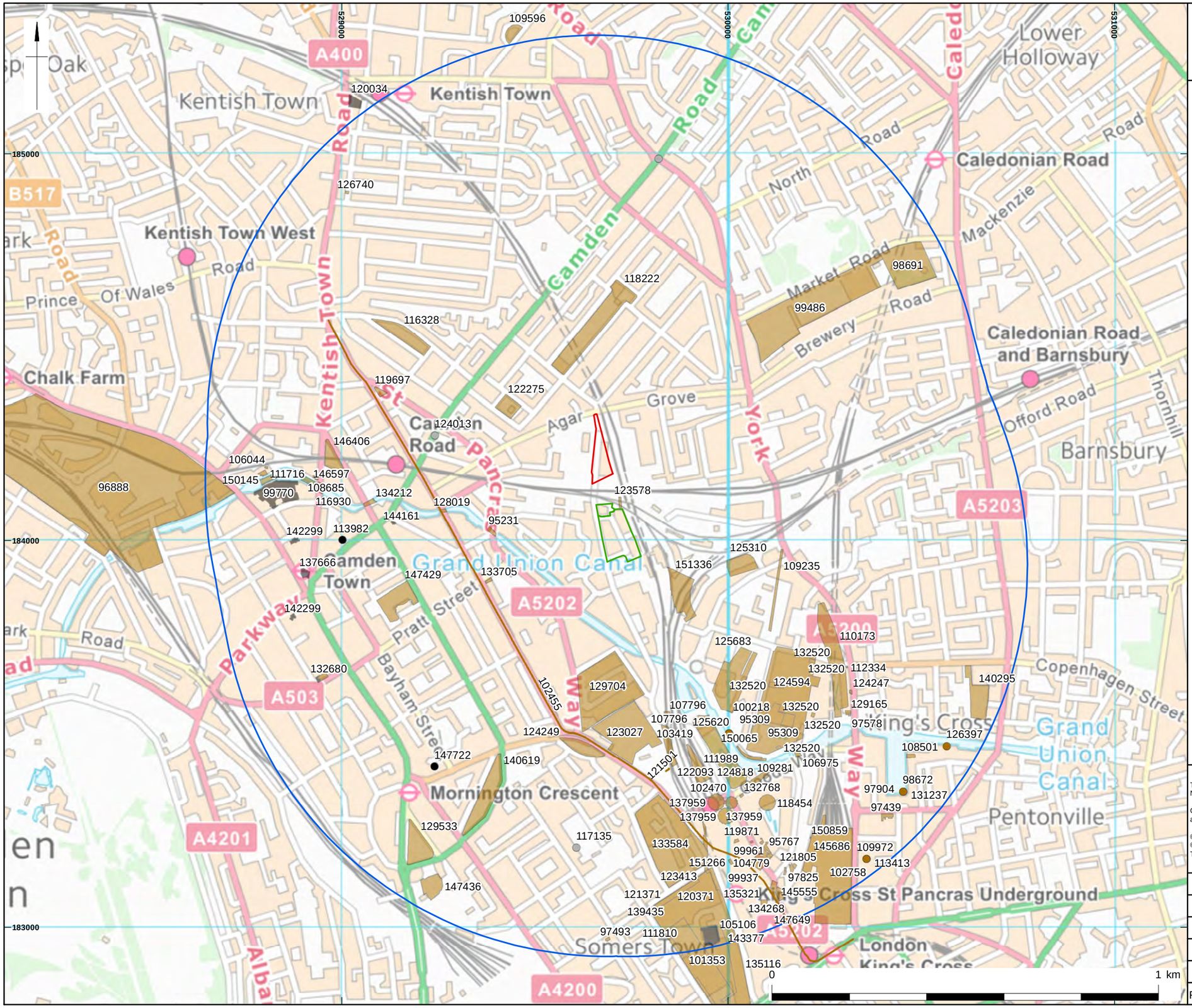
The Site, 1km Study Area and Archaeological Records dating to the Post-medieval period

Figure 4



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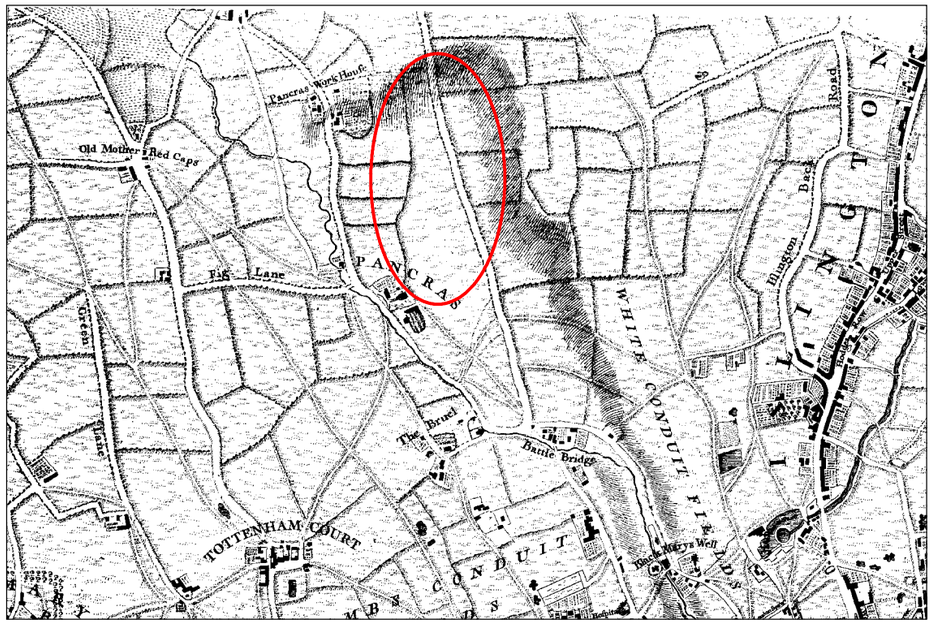
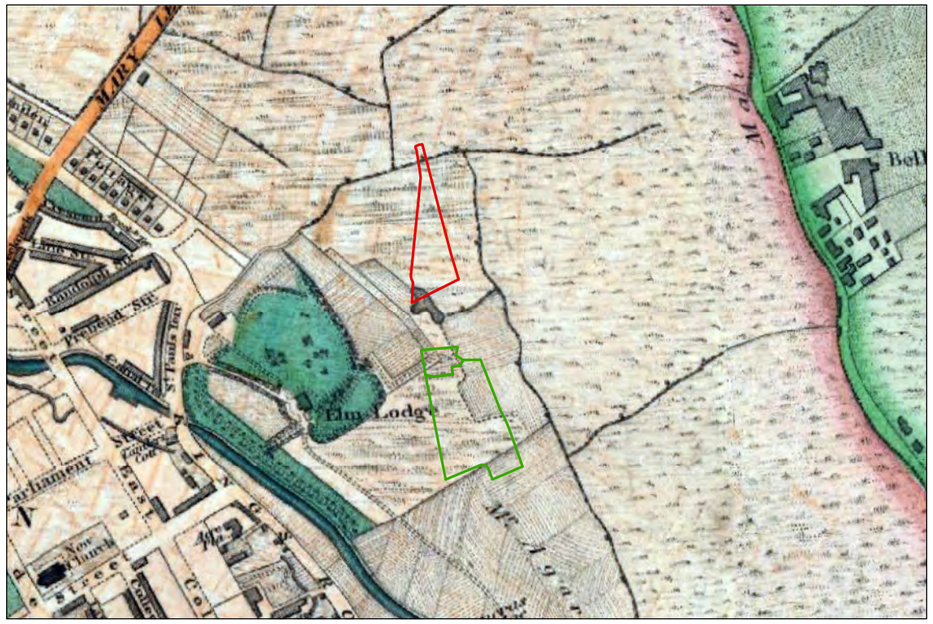
The Site, 1km Study Area and Archaeological Records dating to the 19th century, Modern period and Undated records

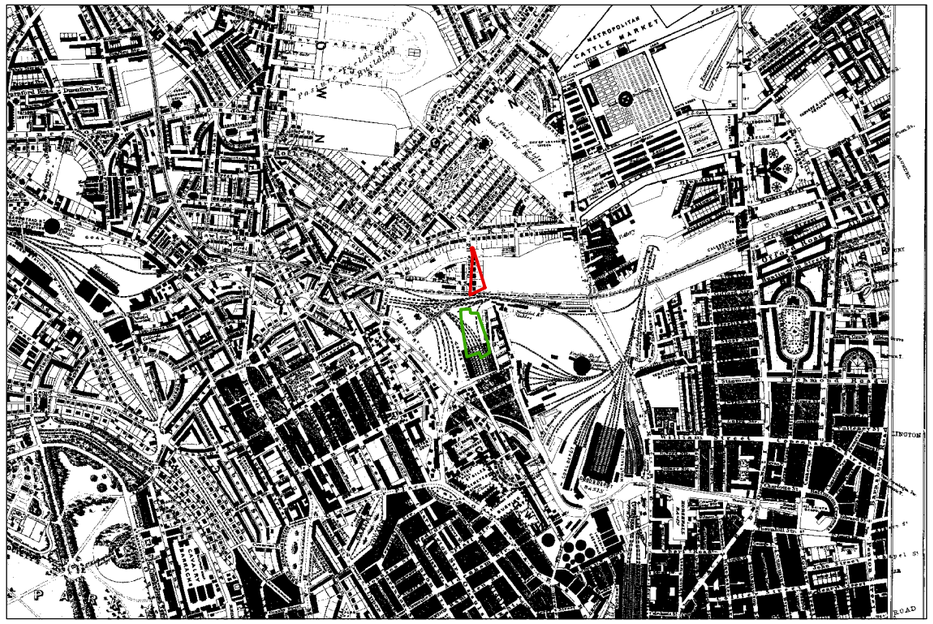
Figure 5



A) John Rocque's Map of London 1746



B) 1828 Greenwood Map of London



C) Edward Stanford's Map of London, 1862

Site

Site A (North)

Site B (South

Approximate Site Localtion

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Historic Mapping 1746-1862

Figure 6