

**Date: 16<sup>th</sup> May 2025**

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Our ref: 2024/4487/P

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Dear Natalie Davies,

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)  
REGULATIONS 2017:**

**RE: West Kentish Town Estate, Camden – EIA Scoping Opinion**

The London Borough of Camden (LBC) previously adopted an EIA Scoping Opinion for the above development in March 2023. This was in response to a request for an EIA Scoping Opinion received by the Council on 29th November 2022, which was subsequently updated via an EIA Scoping Report Addendum on 20<sup>th</sup> of December 2022.

Since the adoption of the EIA Scoping Opinion in March 2023, a further EIA Scoping Report Addendum (dated the 19<sup>th</sup> of September 2024) has been received by the Council. This EIA Scoping Report Addendum includes the following updates to the position previously described by the applicant:

- Amendments to the description of the proposed development, specifically to phasing, maximum height, housing tenure mix and distribution;
- Commentary on revised baseline conditions;
- Commentary on any relevant changes to the previously proposed assessment scope, for the previously identified “scoped in” topics, as a result of the amendments to the description of the proposed development;
- Commentary on the assessment of cumulative schemes, including identification of relevant schemes; and
- Responses to the proposed scope of the EIA, in response to LBC’s original March 2023 EIA Scoping Opinion.

Given LBC are in receipt of the above further information, LBC has prepared an EIA Scoping Opinion Addendum, contained within this letter, which amends and should be read alongside the March 2023 EIA Scoping Opinion. The March 2023 EIA Scoping Opinion, as amended and read alongside this EIA Scoping Opinion Addendum letter, form together a revised formal Scoping Opinion for the proposed development in accordance with Regulation 15 of the Town and Country Planning

(Environmental Impact Assessment) Regulations 2017 (as amended), herein referred to as the 'EIA Regulations 2017'.

The following consultees have responded to the further information provided by the applicant, and their responses have been considered, in preparing this EIA Scoping Opinion Addendum letter:

- LBC (London Borough of Camden) – Building Control (Fire Safety);
- LBC – Nature Conservation and biodiversity;
- LBC – Sustainability (air quality);
- LBC – Transport;
- LBC – Heritage Conservation
- LBC – Affordable Housing Coordinator;
- Camden Nature Corridor;
- Historic England;
- Greater London Archaeological Advisory Service;
- London Healthy Urban Development Unit;
- Natural England;
- The Heath and Hampstead Society;
- Metropolitan Police Service; and
- West Kentish Town CAAC.

The following Appendices are included to this EIA Scoping Opinion Addendum letter:

- Appendix 1 – March 2023 Scoping Opinion – this includes consultee responses received ahead of this original Scoping Opinion being adopted; and
- Appendix 2 – Consultation Responses on the September 2024 EIA Scoping Report Addendum

The Council's comments on the September 2024 EIA Scoping Report Addendum are provided in the sections below. For clarity, comments have been provided on each relevant section of the EIA Scoping Report Addendum.

## **EIA Scoping Opinion Addendum**

The information included in this section is considered appropriate.

## **The Proposed Development as Described within the EIA Scoping Report**

The amendments to the description of the proposed development, described in this section, are noted.

## **The Amendments to the Proposed Development**

The amendments to the description of the proposed development, described in this section, are noted.

## **Revised Baseline Conditions**

The description of the revised baseline conditions, described in this section, are noted.

## Revision to Environmental Impact Assessment Scope

### **Socio Economics**

#### LBC Response

The applicant has noted that the amendments to the proposed development do not change the proposed methodology for assessing socio-economics. This is considered acceptable.

### **Climate Change and Greenhouse Gases**

#### LBC Response

The applicant has noted that the amendments to the proposed development do not change the proposed methodology for assessing climate change and greenhouse gases. This is considered acceptable, notwithstanding that LBC's comments made in the March 2023 EIA Scoping Opinion (Appendix 1 to this letter) should be addressed in the ES, unless agreed otherwise in the subsequent section titled "Appendix 2: EIA Scoping Opinion Response" of this letter.

The West Kentish Town CAAC have raised further comments, as included below. These comments relate to design considerations, rather than comments that affect the assessment methodology of the EIA.

- **West Kentish Town CAAC**

#### *Climate Change and Greenhouse Gases*

*Conservation of the fabric of our cities depends on mitigation of and adaptation to climate change. Since the scoping document was first published two years ago (2022), the risks of climate change have become even more apparent, with the IPCC<sup>1</sup> making clear that urgent, radical action is required now. We do not think that Camden Council has adequately taken these risks into account in the proposed development, nor developed proposals that will address them.*

*As reported by the IPCC in 2023<sup>1</sup>*

#### *Cities, Settlements and Infrastructure*

*C.3.4 Urban systems are critical for achieving deep emissions reductions and advancing climate resilient development (high confidence). Key adaptation and mitigation elements in cities include considering climate change impacts and risks (e.g., through climate services) in the design and planning of settlements and infrastructure; land use planning to achieve compact urban form, co-location of jobs and housing; supporting public transport and active mobility (e.g., walking and cycling); the efficient design, construction, retrofit, and use of buildings; reducing and changing energy and material consumption; sufficiency<sup>52</sup>; material substitution; and electrification in combination with low emissions sources (high confidence). Urban transitions that offer benefits for mitigation, adaptation, human health and well-being, ecosystem services, and vulnerability reduction for low-income communities are fostered by inclusive long-term planning that takes an integrated approach to physical, natural and social infrastructure (high confidence). Green/ natural and blue infrastructure supports carbon uptake and storage and either singly or when combined with grey infrastructure can reduce energy use and risk from extreme events such as heatwaves, flooding, heavy precipitation*

*The current proposals will contribute to climate change by creating a large amount of 'up-front' carbon emissions. This is due to the type of construction necessary for the configuration of the buildings that are proposed: the construction of high-rise concrete framed buildings with deep concrete basements create very high levels of emissions, that will take more than 60 years to break even through savings in operational carbon. Up-front carbon emissions are of vital importance as what we do within the next few years is critical to avoiding the worst impacts of climate change.*

*Camden Council has not reviewed retrofit and refurbishment properly in developing these proposals. No work on the feasibility of retrofit was carried out before the residents' ballot. The study done recently has only been carried out because it is a planning requirement. It is not thorough or conclusive.*

*We refer planners to research carried out into the feasibility of retrofit at West Kentish Town Estate, which can be downloaded here: <https://www.aabarchitects.co.uk/exhibition/>*

## **Traffic and Movement**

### LBC Response

The applicant has noted the previous request from LBC to 'scope in' traffic and movement to the EIA. As a result, this topic will now be included in the EIA.

LBC agrees with the position set out by the applicant, i.e. that this assessment should be completed in line with the new IEMA guidance "Environmental Assessment of Traffic and Movement", published in July 2023.

LBC's comments made in the March 2023 EIA Scoping Opinion (Appendix 1 to this letter) should be addressed in the ES, unless agreed otherwise in the subsequent section titled "Appendix 2: EIA Scoping Opinion Response" of this letter.

LBC's Transport officer has clarified on the standalone planning documents, that they would expect to see submitted with the planning application, beyond the EIA, as included below.

- **LBC Transport officer response**

*Transport Strategy would like to request that the following documents are submitted with the planning application:*

- *Transport Assessment, including a multi-modal trip generation analysis and the Active Travel Zone (ATZ) assessment in line with the TfL Healthy Streets guidance,*
- *Delivery and Servicing Plan,*
- *Travel Plan in line with CPG Transport,*
- *Car Park Management Plan,*
- *Construction Management Plan in line with LB Camden guidance on construction management.*

## **Air Quality**

### LBC Response

The applicant has noted that the amendments to the proposed development do not change the proposed methodology for assessing air quality. This is considered acceptable, notwithstanding that LBC's comments made in the March 2023 EIA Scoping Opinion (Appendix 1 to this letter) should be addressed in the ES, unless agreed otherwise in the subsequent section titled "Appendix 2: EIA Scoping Opinion Response" of this letter.

LBC agrees with the position set out by the applicant, i.e. that this assessment should be completed in line with the new IAQM guidance "Assessment of Dust from Demolition and Construction", published in January 2024.

## **Noise and Vibration**

### LBC Response

The applicant has noted that the amendments to the proposed development do not change the proposed methodology for assessing noise and vibration. This is considered acceptable,

notwithstanding that LBC's comments made in the March 2023 EIA Scoping Opinion (Appendix 1 to this letter) should be addressed in the ES, unless agreed otherwise in the subsequent section titled "Appendix 2: EIA Scoping Opinion Response" of this letter.

### ***Daylight, Sunlight, Overshadowing and Solar Glare***

#### LBC Response

The applicant has noted that the amendments to the proposed development do not change the proposed methodology for assessing daylight, sunlight, overshadowing and solar glare. This is considered acceptable, notwithstanding that LBC's comments made in the March 2023 EIA Scoping Opinion (Appendix 1 to this letter) should be addressed in the ES, unless agreed otherwise in the subsequent section titled "Appendix 2: EIA Scoping Opinion Response" of this letter.

### ***Wind Microclimate***

#### LBC Response

The applicant has noted that the amendments to the proposed development do not change the proposed methodology for assessing wind microclimate. This is considered acceptable.

### ***Ecology***

#### LBC Response

The November 2022 EIA Scoping Report, submitted by the applicant, proposed for the inclusion of Ecology and Biodiversity in the ES. This was based on a precautionary approach relating to bats, due to unconfirmed presence and / or high potential roosting habitat across the site.

The applicant has subsequently noted, in the September 2024 EIA Scoping Report Addendum, that several further surveys have since been undertaken or are underway. Given that the surveys would likely be available across the entire site, at the time of submission of the ES and planning application, then they are proposing to scope out Nature and Biodiversity from the ES, should these surveys determine the absence of bats and / or high potential roosting habitat on-site. They further note that if the surveys do confirm that roosting bats are present, or that the existing buildings have high roosting potential, Ecology and Biodiversity will remain scoped into the ES.

Camden Nature Corridor have raised comments as below. They have suggested that they are in possession of ecological data that is relevant to this site, that they are willing to share. It is therefore recommended that the applicant liaises with Camden Nature corridor further to attempt to obtain this data.

In summary, LBC are in agreement with the position to scope out ecology from ES, if there is sufficient survey information available to determine the absence of bats and / or high potential roosting habitat on-site. Assuming this is the case, the non-EIA ecology work submitted with the planning application should consider the wider points raised by West Kentish Town CAAC and Camden Nature Corridor.

The West Kentish Town CAAC have raised further comments, as included below, relating to tree and soil eco-system services. These comments should be considered as part of the wider non-EIA planning application documentation, including the arboricultural and ecological assessment work.

LBC's Nature Conservation officer confirms that they have no further comments on the scope of the EIA.

- **West Kentish Town CAAC**

#### *Ecology*

*The proposals will also reduce our ability to adapt and create a resilient neighbourhood because of the impact on the existing trees, nature and biodiversity on the site. The existing trees and soil provide eco-system services which have not been properly accounted for in the assessment. Please refer to the Hero Trees of Kentish Town Estate report, which can be accessed here: <https://www.transitionkentishtown.org.uk/portfolio/save-our-hero-trees/>*

- **Camden Nature Corridor**

*Since the original EIA submission (2022/5281/P), a proposal for a Camden Nature Corridor has been developed by a consortium of local organizations and submitted in 2024 to Camden Local Plan Consultation. It includes suggestions for biodiversity improvement in five Camden Sites of Interest for Nature Conservation (including Talacre Town Green bordering WKTE) and in three priority Camden Site Allocations, Murphy's Yard, Regis Road and WKTE itself. Subsequently, Camden Council has indicated its plans to "include reference in the new local plan to the Camden Nature Corridor as an infrastructure priority for the "Central Area" within which the three sites referred to are located ... [and] ... to include reference to the Corridor within each of the respective site allocations". Hence, as WKTE is now proposed as a part of the Camden Nature Corridor, we request that it be scoped into the ecological work of the EIA for WKTE re-development.*

*We suggest three ways in which this could be done. There may be others.*

*First, the Camden Nature Corridor has been collecting biodiversity data on WKTE (e.g. bat and nesting bird survey data) for over a year. As this ecological data will be more comprehensive than the data on which the EIA can draw, we request that it be included and used in assessment of the ecological impact of planned development. Our ecological studies in WKTE are ongoing and we would be pleased to work collaboratively with the organization(s) conducting the EIA on further surveys.*

*Secondly, we suggest that the EIA consider the potential impact of development on both species presently on the WKTE site and species encouraged and anticipated to establish there as a result of the Camden Nature Corridor, which include many London Priority Species for conservation. For example, with respect to bats, which are mentioned specifically in the EIA Scoping Addendum, our surveys have already identified Common Pipistrelle (*Pipistrellus pipistrellus*) as a species active in WKTE. Eight other protected London bat species are found in Hampstead Heath, the other "end" of the Nature Corridor, and the aim is to facilitate their spread, potentially into the WKTE.*

*Finally, the Camden Nature Corridor will need to work across three Site Allocations: WKTE, Regis Road and Murphy's Yard. The present Cumulative Scheme Map for the EIA includes Regis Road and Murphy's Yard. In its recent Regis Road Area Guidance: Addendum to the Kentish Town Planning Framework November 2024, the Council has specifically identified the inclusion of the Camden Nature Corridor on these sites. We suggest therefore that the WKTE EIA's consideration of these two Cumulative Schemes include a specific ecological element dealing with the Nature Corridor. We also note that the plan in this Addendum for Regis Road includes opening up new, direct access to these Schemes from West Kentish Town, and that it might now be considered a Tier 2 Cumulative Scheme.*

## ***Heritage, Townscape and Visual Impact Assessment***

### **LBC Response**

The applicant has outlined the further viewpoints to be assessed, as agreed with LBC, beyond those originally proposed in the November 2022 EIA Scoping Report.

LBC's comments made in the March 2023 EIA Scoping Opinion (Appendix 1 to this letter) should be addressed in the ES, unless agreed otherwise in the subsequent section titled "Appendix 2: EIA Scoping Opinion Response" of this letter.

The West Kentish Town CAAC have raised further comments, as included below. They are in agreement with the additional views being scoped into the assessment.

Historic England have raised further comments, as included below. The majority of these comments repeat those received on the 9<sup>th</sup> December 2022. However, the second paragraph includes new commentary of the protected vista from Parliament Hill, which should be considered by the applicant.

LBC's Heritage Conservation officer further confirms that they are satisfied that the views proposed already, would be satisfactory for the assessment of setting impacts to built heritage.

- **West Kentish Town CAAC**

*Heritage, Townscape and Visual Impact Assessment*

*We welcome the requirement by the Conservation Officer for additional views to enable the impact of the development to be fully assessed in respect of the impact on existing streetscape. We think that this will be worsened by the increased height of the tower.*

- **Historic England**

*This development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.*

*Our initial assessment shows the application site lies within the protected vista from Parliament Hill (east of the summit - at the prominent oak tree) to the Palace of Westminster. Any potential future application should be considered especially carefully to ensure there is no harm to this protected vista. Tall elements that would impact it should be sited outside of the corridor.*

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

*We would strongly recommend that you involve the Conservation Officer of Camden and the Greater London Archaeology Advisory Service in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.*

*Given the heights of the structures associated with the proposed development and the surrounding landscape character, this development is likely to be visible across a very large area and could, as a result, affect the significance of heritage assets at some distance from this site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.*

*It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.*

*The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage*

*patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.*

- **LBC Heritage Conservation officer**

The only change that may impact on the built heritage would be an increase of the maximum height from 50 to 55 metres. The impact of this on the setting of nearby heritage assets would still be picked up by the location of the viewpoints identified in the Heritage, Townscape and Visual Impact Assessment. No additional viewpoints are requested.

## **Cumulative Schemes**

### **Updated Cumulative Scheme List and Map (included in Appendix 1 of the September 2024 EIA Scoping Report Addendum)**

#### LBC Response

LBC consider that the currently proposed thresholds of 150 new homes and 10,000sqm GEA of floorspace is too low, when determining schemes for consideration, to adequately assess the significance of cumulative effects in this location. We therefore request that the ES adopts the following amended thresholds for cumulative schemes to be considered within the ES:

- Residential development of between 50 or more dwellings
- The provision of a building or buildings where the floor space to be created by the development is 5,000 square meters or more

### **EIA Scoping Opinion Response (included in Appendix 2 of the September 2024 EIA Scoping Report Addendum)**

For context, the applicant has provided commentary on the March 2023 EIA Scoping Opinion adopted by LBC in Appendix 2 of their September 2024 EIA Scoping Report Addendum. They have provided commentary on certain points that were raised, where they wish to agree an alternative approach. LBC have provided commentary on whether this is considered acceptable or not, in the below sections corresponding to the headings used in the September 2024 EIA Scoping Report Addendum.

#### ***The Proposed Development and the Planning Application***

##### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

#### ***Planning Context***

##### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.



## ***EIA Methodology – Baseline Conditions***

### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## ***EIA Methodology – Demolition and Construction***

### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## ***EIA Methodology – Environmental Design Management Measures***

### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## ***EIA Methodology – Completed Development***

### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## ***Cumulative Effects***

### LBC Response

The following point of clarification is raised, where the applicant states:

*Certain schemes requested have not been included within the cumulative effects assessment, where significant cumulative effects are demonstrated to be unlikely. This justification has been provided with the new list.*

For consistency, we suggest that it would be prudent to include them in the list, if they meet the thresholds set. Then, in the relevant technical assessments undertaken, discount them as necessary.

The following point of clarification is raised, where the applicant states:

*At the time of writing, no schemes would fall within Tier 2 defined at EIA scoping (Schemes with a submitted planning application which are awaiting determination). Therefore Tier 3 has been referenced as Tier 2 throughout the ES.*

We recommend that the Tier 2 definition is adopted and remains intact, given that relevant schemes could be submitted for planning ahead of the ES being submitted and / or now be relevant due to the amended thresholds.

## ***Alternatives and Design Evolution***

### **LBC Response**

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## ***Determining Effect Significance – Effect Scale***

### **LBC Response**

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## ***Determining Effect Significance – Effect Nature***

### **LBC Response**

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## ***Determining Effect Significance – Geographic Extent***

### **LBC Response**

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## ***Determining Effect Significance – Effect Duration***

### **LBC Response**

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## ***Determining Effect Significance – Direct and Indirect Effects***

### **LBC Response**

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## Air Quality

### LBC Response

The following point of clarification is raised, where the applicant states:

*It is noted that CPG 'Air Quality' specifies that "Modelling should not predict improvements to future years (future vehicle emissions or future background concentrations)".*

*Whilst the concept of a precautionary principle in regard to air quality modelling is understood, applying this to the assessment presented within the Air Quality ES assessment is not considered appropriate for the following reasons:*

- The approach outlined in the guidance cannot be justified from trends in monitoring data across the UK. Data for the nearest monitoring site to the proposed development with long-term measurements (CA16) are shown in the table below; the reduction in measured concentrations is evident since 2017. Indeed, Camden's own Annual Status Report states "The continued reduction in NO<sub>2</sub> concentrations over the past seven years is clear".*

Site	Measured NO <sub>2</sub> Concentration (ug/m <sup>3</sup> )							
	2014	2015	2016	2017	2018	2019	2020	2021
CA16	57.8	63.6	58.7	68.8	54.7	45	33.4	32.4

- At a London authority level, analysis has demonstrated that the introduction of the ULEZ and LEZ has reduced concentrations of NO<sub>2</sub> in Inner London by 21% since 2021; this is likely to continue given that it has been announced that the ULEZ will expand further to encompass all of London in August. The regeneration of the West Kentish Town estate will take place over a period of several years, thus by the time the development is fully operational, it is reasonable to assume that concentrations will have reduced further as a result of the wider ULEZ and other policy interventions (such as measures in Camden's latest Air Quality Action Plan). These improvements are not currently accounted for in the EFT (v11.0) that will be used to calculate emission factors for the assessment, as such the use of the EFT is considered conservative.*
- The construction of the Proposed Development will be phased over several years and are not expected to be fully complete and operational until 2044 (to be confirmed in the ES). NO<sub>x</sub> concentrations are most likely to decline more quickly in the future, on average, than predicted by the current EFT. Therefore, assuming no improvements in air quality (emissions and backgrounds) from 2019 to 2044 is very unrealistic (i.e., no change in air quality over a 25-year period). By doing so it does not take account of the decline in vehicle combustion emissions (newer vehicles with cleaner exhaust emissions) / uptake of electric vehicles / increase in sustainable transport modes etc.*
- Should an exceedance of the objective be predicted, by applying this approach, it is not possible to forecast the duration of this exceedance as traffic emissions and background concentrations are held constant.*

*Therefore, it is the Air Quality Consultants (AQC) professional opinion that the approach outlined in CPG 'Air Quality' is overly conservative and unsupported by the empirical evidence. The Air Quality assessment will use the predicted future air quality conditions as a baseline from which to determine the effects of the completed and operational Proposed Development.*

In response to this point raised, LBC's sustainability officer has raised that the site should be designed considering existing air quality and existing limits, as we cannot be certain of predictions of either future air quality or of future air quality limits/standards. Whilst we are expecting improvements in air quality

we are also expecting more stringent standards. It should be noted that the Camden Clean Air Action plan 2023-2026 looks to achieve the WHO limits 2034 of NO<sub>2</sub> 10µg.m<sup>3</sup>, PM<sub>2.5</sub> 5µg.m<sup>3</sup>, PM<sub>10</sub> 15µg.m<sup>3</sup> but this does not cover the development until 2044. The only knowns are the current air quality and current limits and therefore these should be considered for the design of the development.

The following point of clarification is raised, where the applicant states:

*The London Borough of Camden is currently undertaking long-term monitoring at a number of automatic and diffusion tube monitoring sites within its administrative boundary. Whilst there are not any monitoring sites within the immediate vicinity of the Proposed Development, there are monitoring sites within 3km in locations with similar air quality conditions to the application site, i.e., at a distance from any nearby major sources of pollution.*

*Given the fact that these monitoring sites have been deployed for a number of years (i.e., long-term), and that the verification of the modelled results will utilise 2022 (or 2023 should data be available) as the baseline year, the judgement of the air quality consultant is that undertaking a monitoring survey is not necessary. Instead, the sites that are deemed representative of conditions at the Proposed Development will be used in the verification, where traffic information in the London Atmospheric Emissions Inventory (LAEI) for the roads adjacent these sites is available.*

*Air quality monitoring (and subsequent verification) for NO<sub>2</sub> and particulate matter as part of future demolition and construction stages is expected to form a commitment by the Applicant as part of the Environmental Statement which will accompany the planning application.*

*In order to ensure this monitoring is completed, the Applicant is already in discussions with Camden's Air Quality Officer for the provision of air quality monitoring to commence. This is expected to include monitoring before/during construction (which is likely to cover particulate matter/dust).*

In response to this point raised, LBC's sustainability officer has raised that since the initial assessment, Camden has begun diffusion tube monitoring in the development area, with at least 20 sites in relatively close proximity. These could be used in the assessment, and therefore local air quality monitoring is no longer required.

## **Climate Change and Greenhouse Gas**

### LBC Response

The following points of clarification are raised, where the applicant states:

*The GHG assessment will follow the guidance on assessing greenhouse gas emissions as prescribed within the IEMA 2022 Guidelines. Where information is available, the baseline GHG emissions will be calculated. However, according to the guidance, where information is not available, the 'current baseline' is to be considered as zero.*

Note the IEMA - Assessing Greenhouse Gas Emissions and Evaluating their Significance guidance (February, 2022) states:

*It may not always be possible to report on current baseline emissions, particularly with projects situated in areas with no physical development or activity. In this instance there would be zero GHG emissions to report at a site level, although particular attention should be paid where changes in land use are expected.*

AND

*GHG emissions associated with other sources or activities such as playing fields may be harder to estimate. It may be appropriate to assume zero baseline GHG emissions in such*

*cases to ensure a reasonable worse-case approach to establishing the net GHG effect of the project. It could in such cases be important to also quantify (estimate) emissions release from the land used change and soil disturbance*

Regarding setting the baseline as zero, the guidance refers specifically to no physical development or activity. If the applicant is instead referring to existing physical development or activity, but a lack of data being available, then the baseline emissions are not zero. Rather than automatically setting the baseline to zero, clearly defined assumptions and benchmarks could instead be used to estimate baseline conditions where site-specific data is unavailable. However, LBC also acknowledges that setting the baseline at zero would be robust – and therefore acceptable, for specific land uses where existing data is unavailable, given that this would represent a worst case scenario in the prediction of the environmental effects.

## **Noise and Vibration**

### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## **Ecology and Biodiversity**

### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## **Socio-Economics**

### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## **Human Health**

### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## **Heritage, Townscape and Visual Impact**

### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion on this section. It is noted that the applicant intends to include the additional views, previously requested by LBC, in the assessment. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## ***Daylight, Sunlight, Overshadowing and Solar Glare***

### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## ***Wind Microclimate***

### LBC Response

The following point of clarification is raised, where the applicant states:

*The safety and comfort thresholds will be set as per the Lawson Comfort Criteria as opposed to the City of London. The City of London Criteria has been specifically designed for the City itself and is not always suitable for comparison in other parts of London and throughout the UK and as such the Lawson Comfort Criteria will be used across the Wind Microclimate assessment for the EIA.*

Buro Happold's wind microclimate team (acting in a peer review capacity) have highlighted the following points that were agreed on a call with RWDI and Trium (on Thursday 6th July 2023):

- The results will be reviewed and discussed in the context of 1.9 hours per year for 15m/s – which will be the target for publicly accessible areas. 2.2 hours per year for 15m/s will be considered as a threshold for non-publicly accessible areas, however RWDI will look to improve on this through the design / assessment process
- Regarding comfort, 8 m/s (or better) within the public realm for walking will be targeted, however up to 10 m/s is considered acceptable for walking comfort

Buro Happold's wind microclimate team (acting in a peer review capacity) have highlighted that this previously agreed position should be followed.

## ***Transport and Access***

### LBC Response

The applicant has noted the previous request from LBC to 'scope in' traffic and movement to the EIA. As a result, this topic will now be included in the EIA.

LBC agrees with the position set out by the applicant, i.e. that this assessment should be completed in line with the new IEMA guidance "Environmental Assessment of Traffic and Movement", published in July 2023. The clarification on the approach to the assessment to be adopted, in line with this guidance, is noted.

## ***Geo-Environmental (Ground Conditions, Groundwater and Soils)***

### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## ***Waste and Materials***

### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

## ***Water Resources, Drainage and Flood Risk***

### LBC Response

The applicant has noted the previous comments made in the March 2023 EIA Scoping Opinion. There are no points of clarification, regarding the scope of the EIA, raised by the applicant on this section.

The information to be included within the Sustainable Drainage Systems Report, to be submitted as standalone planning report, is noted.

## **Other matters**

Comments from LBC's Affordable Housing Development Coordinator have been received. These comments relate to design considerations, as opposed to the scope and methodology of the EIA. Specifically, they have flagged that they would support retaining an element of homes for Intermediate Rent.

No comments have been raised by LBC Building Control (Fire Safety) on the EIA Scoping.

Comments from the Metropolitan Police are included in Appendix 2. These comments relate to design considerations, as opposed to the scope and methodology of the EIA, and should be considered by the applicant.

Comments from the London Healthy Urban Development Unit are included in Appendix 2. They have requested that the impact on NHS healthcare infrastructure and service delivery are properly assessed. This should be included as part of the standalone Health Impact Assessment.

Comments from the Heath and Hampstead Society are included in Appendix 2. It is considered that these comments primarily relate to design considerations, rather than affecting the already proposed scope and methodology of the EIA – which includes a proposed assessment relating to visual impact, wind microclimate and air quality.

Comments from Greater London Archaeological Advisory Service are included in Appendix 2. They agree with archaeology being scoped out of the EIA.

Comments from Natural England are included in Appendix 2. This includes their standard advice, which can be considered, similar to that provided previously for the March 2023 Scoping Opinion.

No further comments have been raised by the following parties:

- LBC (London Borough of Camden) – Building Control (Access);
- LBC – Residents Safety Engagement
- LBC – Economic Development/Inclusive Economy;
- LBC – Environmental Services (Waste);
- LBC – Environmental Services (Contaminated Land);
- LBC – Environmental Services (Pollution Team);
- LBC – Public Open Space;
- LBC – Trees and Landscaping Officer;
- LBC – Sustainability (energy, sustainability, drainage and flood risk);

- LBC – Urban Design;
- LBC - Policy
- Camden Clinical Commissioning Group
- National Grid
- Network Rail
- TfL Property
- Greater London Authority
- London Fire Brigade
- British Transport Police
- Bartholomew Estate and Kentish Town CAAC
- Kentish Town Neighbourhood Forum
- Queen's Crescent Neighbourhood Forum
- National Amenity Societies

Comments have been raised by local residents, that are available on the LBC planning portal alongside this EIA Scoping Opinion (2024/4487/P). These comments are flagged for your onward consideration.

I trust that this letter, to be read alongside the original March 2023 Scoping Opinion, provides a comprehensive response to the request for an EIA Scoping Opinion submitted by the applicant. The two read together, form LBC's updated EIA Scoping Opinion for the proposed development. Should responses be received after the issue of this response they will be forwarded to you for consideration and inclusion within the ES.

Please note that this EIA Scoping Opinion is offered with the caveat that should the form of development deviate to a significant degree from that described to date, a further request for an EIA Scoping Opinion may prove necessary. In addition, this EIA Scoping Opinion is offered without prejudice to the right, if necessary, to raise further issues for consideration as part of the future assessment of the proposals.

Scoping should be an iterative process. Recommendations for additional consultations with key consultees have been made in this EIA Scoping Opinion to further agree the scope of certain assessments. We recommend that all consultation responses, including those going forward, are included within the ES to provide clarity on all discussions regarding assessment scopes.

Should you have any questions or queries, please do not hesitate to contact Christopher Smith on 020 7974 5311 ([Christopher.Smith1@camden.gov.uk](mailto:Christopher.Smith1@camden.gov.uk)).



**Appendix 1 – March 2023 Scoping Opinion (includes consultee responses received at that time)**

NB: can be found on the Council's planning register using the reference 2022/5281/P (web link below)

[2022/5281/P EIA Scoping Opinion Report](#)

## Appendix 2 – Consultation Responses on the September 2024 EIA Scoping Report Addendum

### Thames Water

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

Our DTS Ref: 65092  
Your Ref: 2024/4887/P - Scoping Opinion Amendment

11 November 2024

Dear Sir/Madam

Re: WEST KENTISH TOWN ESTATE, GRAFTON ROAD, LONDON, NW5

Waste Comments

Water Comments

Thank you for giving Thames Water the opportunity to comment on the above application. Thames Water are the statutory water and sewerage undertaker for the area and would like to make the following comments: Thames Water are satisfied that the report has considered the Water and sewerage needs of the development as set out in The EIA Regulations 2017 Schedule 4

Yours faithfully  
Development Planning Department

Development Planning,  
Thames Water,  
Maple Lodge STW,  
Denham Way,  
Rickmansworth,  
WD3 9SQ  
[Tel:020 3577 9998](tel:02035779998)  
Email: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)

## Sport England

Thank you for consulting Sport England.

Sport England considers that the impact of a development on sports facilities or activities would not normally fall within the scope of an Environmental Statement. Consequently, we do not wish to comment on the Screening or Scoping Opinion consultation.

However, any subsequent planning application should consider the implications for sport in the context of NPPF Paragraph 103, local plan policy, and any strategic evidence set out in local playing pitch and/or built facilities strategies.

Sport England should be consulted on the planning application if it meets the statutory requirements contained within SI 2015/295 (development affecting playing fields) or the guidance for non-statutory consultation with Sport England contained within Planning Practice Guidance: Open Space, Sports and Recreation Facilities (Paragraph: 003, Reference ID: 37-003-20140306).

General guidance on assessing the need to protect, enhance and provide sports facilities can be found by following the link below:

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning\\_applications](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

**Planning Technical Team**

E: [planning.south@sportengland.org](mailto:planning.south@sportengland.org)

## LBC Building Control

**Re: Planning Application Consultation Ref:2024/4887/P West Kentish Town Estate**

The Proposed Work:

**EIA Addendum to request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the redevelopment of the West Kentish Town Estate to provide up to approximately 898 dwellings (with a mix of affordable and market housing) and ancillary commercial uses in buildings ranging from 4 to 14 storeys in a variety of different housing typologies including flats and maisonettes alongside new routes, open space, play space, hard and soft landscaping and other associated works. AMENDMENT - EIA Scoping Addendum received.**

We comment as follows:

No access or fire safety matters noted in submission

Regards,

Albert Grant  
Principal Building Control Officer  
Environment and Sustainability  
Supporting Communities  
London Borough of Camden

## TfL Infrastructure

**Application No:** 2024/4887/P

**Site address:** West Kentish Town Estate Land bounded by Queens Crescent Grafton Road Althone Street Rhyl Street Weedington Road Coity Road Warden Road Bassett Street and Allcroft Road London NW5

**Proposal:** EIA Addendum to request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the redevelopment of the West Kentish Town Estate to provide up to approximately 898 dwellings (with a mix of affordable and market housing) and ancillary commercial uses in buildings ranging from 4 to 14 storeys in a variety of different housing typologies including flats and maisonettes alongside new routes, open space, play space, hard and soft landscaping and other associated works. AMENDMENT - EIA Scoping Addendum received.

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted for Scoping Opinion on Environmental Impact Assessment.

Further comments/conditions (if any) will be provided at full planning application stage.

Your proposals may affect NR. Please contact them directly to query what affect, if any, the proposals will have on the railway.

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

Kind regards,

**Tom Li**

Safeguarding Engineer (LU+DLR) | Infrastructure Protection  
5 Endeavour Square | 7<sup>th</sup> Floor Zone B | Westfield Avenue | E20 1JN

## LBC Nature Conservation

I don't have any comments for this one.

Are you dealing with the pre-app discussions? It would be interesting to hear where they have got to with the BNG assessment.

Best wishes

Greg

## LBC Green Spaces

No comment from me on this screening application.

Kind regards

Joe Lewis  
Green Space Development Manager

## LBC Transport

Subject: EIA Addendum to request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the redevelopment of the West Kentish Town Estate to provide up to approximately 898 dwellings (with a mix of affordable and market housing) and ancillary commercial uses in buildings ranging from 4 to 14 storeys in a variety of different housing typologies including flats and maisonettes alongside new routes, open space, play space, hard and soft landscaping and other associated works. AMENDMENT - EIA Scoping Addendum received.

Transport Strategy would like to request that the following documents are submitted with the planning application:

- Transport Assessment, including a multi-modal trip generation analysis and the Active Travel Zone (ATZ) assessment in line with the TfL Healthy Streets guidance,
- Delivery and Servicing Plan,
- Travel Plan in line with CPG Transport,
- Car Park Management Plan,
- Construction Management Plan in line with [LB Camden guidance on construction management](#).

Regards

Joze Stivan  
Senior Transport Planner

## LBC Housing

The 'HCPT affordable housing' general comments against the previous application still apply (attached for ease). The wheelchair comments are based on discussions Amanda had with Laura Dorbeck. The target income band at which the majority of Intermediate Rent homes should be affordable has been updated from £30K-£40k to £33,900-£45,200.

On page 2 of the EIA scoping addendum dated 19 September 2024 there is the following statement regarding tenure:

*The tenure distribution is still be developed. The option to exclude all Intermediate Rent from the Proposed Development in place of Social Rent is being explored of which the final scheme will be presented and tested within the ES accompanying the planning application*

As you are aware we have had conversations internally with the CIP team and whilst we understand some of the reasons to exclude the Intermediate Rent tenure, our team would support retaining an element of homes for Intermediate Rent.

Regards,

Melissa Sparks  
Affordable Housing Development Co-ordinator

## LBC Conservation

The amendments to the proposed development are set out on page 2 of the document. These changes mainly relate to the phasing of development, number and tenure of units.

The only change that may impact on the built heritage would be an increase of the maximum height from 50 to 55 metres. The impact of this on the setting of nearby heritage assets would still be picked up by the location of the viewpoints identified in the Heritage, Townscape and Visual Impact Assessment. No additional viewpoints are requested.

Regards

Alan Wito  
Senior Planner (Conservation)

## LBC Sustainability

Unfortunately the response to the comment 3 (extract below) on Air quality is not acceptable.

**Response to comment 3:** The site should be designed considering existing air quality and existing limits, as we cannot be certain of predictions of either future air quality or of future air quality limits/standards. Whilst we are expecting improvements in air quality we are also expecting more stringent standards. It should be noted that the Camden Clean Air Action plan 2023-2026 looks to achieve the WHO limits 2034 of NO<sub>2</sub> 10µg.m<sup>3</sup>, PM<sub>2.5</sub> 5µg.m<sup>3</sup>, PM<sub>10</sub> 15µg.m<sup>3</sup> but this does not cover the development until 2044. The only knowns are the current air quality and current limits and therefore these should be considered for the design of the development.

**Response to comment 4:** If monitoring is not undertaken then we expect:

- use of the nearest and most representative valid data source or sources to the proposed site. Other things being equal, MCERTS-approved monitors are preferable versus diffusion tubes, while triplicate tube sites are preferred over single tube sites.
- For background concentrations, we expect the use of the nearest AMS station's most recent valid data or the Defra mapped value, whichever is greater.
- We expect use of baseline year data for development year scenarios – especially vehicle emission factors and background concentrations. On the basis of reliability, forward projected values are not accepted except for road movements.

Air Quality																			
LBC Sustainability Officer Response	<p>Comment 3: Air quality has been scoped in and states in Appendix A that "10 The Air Quality assessment will use the predicted future air quality conditions as a baseline from which to determine the effects of the completed and operational Proposed Development." It should be noted that CPG Air Quality states clearly that "Modelling should not predict improvements to future years (future vehicle emissions or future background concentrations)."</p> <p>ACTION: CPG Air Quality should be followed and modelling should not predict improvements.</p> <p>It is noted that CPG 'Air Quality' specifies that "Modelling should not predict improvements to future years (future vehicle emissions or future background concentrations)".</p> <p>Whilst the concept of a precautionary principle in regard to air quality modelling is understood, applying this to the assessment presented within the Air Quality ES assessment is not considered appropriate for the following reasons:</p> <ul style="list-style-type: none"><li>The approach outlined in the guidance cannot be justified from trends in monitoring data across the UK. Data for the nearest monitoring site to the proposed development with long-term measurements (CA16) are shown in the table below; the reduction in measured concentrations is evident since 2017. Indeed, Camden's own Annual Status Report states "The continued reduction in NO<sub>2</sub> concentrations over the past seven years is clear".</li></ul> <table><tr><th>Site</th><th>2014</th><th>2015</th><th>2016</th><th>2017</th><th>2018</th><th>2019</th><th>2020</th><th>2021</th></tr><tr><td>CA16</td><td>57.8</td><td>63.6</td><td>58.7</td><td>68.6</td><td>54.7</td><td>45</td><td>33.4</td><td>32.4</td></tr></table> <ul style="list-style-type: none"><li>As a London authority level, analysis has demonstrated that the introduction of the ULEZ and LEZ has reduced concentrations of NO<sub>2</sub> in Inner London by 21% since 2021; this is likely to continue given that it has been announced that the ULEZ will expand further to encompass all of London in August. The regeneration of the West Kentish Town estate will take place over a period of several years, thus by the time the development is fully operational, it is reasonable to assume that concentrations will have reduced further as a result of the wider ULEZ and other policy interventions (such as measures in Camden's latest Air Quality Action Plan). These improvements are not currently accounted for in the EFT (v11.0) that will be used to calculate emission factors for the assessment, as such the use of the EFT is considered conservative.</li><li>The construction of the Proposed Development will be phased over several years and are not expected to be fully complete and operational until 2044 (to be confirmed in the ES). NO<sub>x</sub> concentrations are most likely to decline more quickly in the future, on average, than predicted by the current EFT. Therefore, assuming no improvements in air quality (emissions and background) from 2019 to 2044 is very unrealistic (i.e., no change in air quality over a 25-year period). By doing so it does not take account of the decline in vehicle combustion emissions (newer vehicles with cleaner exhaust emissions) / uptake of electric vehicles / increase in sustainable transport modes etc.</li><li>Should an exceedance of the objective be predicted, by applying this approach, it is not possible to forecast the duration of this exceedance as traffic emissions and background concentrations are held constant.</li></ul>	Site	2014	2015	2016	2017	2018	2019	2020	2021	CA16	57.8	63.6	58.7	68.6	54.7	45	33.4	32.4
Site	2014	2015	2016	2017	2018	2019	2020	2021											
CA16	57.8	63.6	58.7	68.6	54.7	45	33.4	32.4											

TRIUM

A.3

### West Kentish Town EIA Scoping Opinion Response

Comment Provided by:	EIA Scoping Opinion	EIA Response
	<p>Comment 4: Consideration should be given to how air quality is intended to be analysed (London Plan section 9.1.13). Given the lack of air quality monitoring in the proximity of the development we would encourage installation of air quality monitoring of NO<sub>2</sub> and particulate matter for at least 12 months to verify modelling and improve analysis. ACTION: Local Air quality monitoring should be undertaken to verify modelling.</p>	<p>Therefore, it is the Air Quality Consultants (AQC) professional opinion that the approach outlined in CPG 'Air Quality' is overly conservative and unsupported by the empirical evidence. The Air Quality assessment will use the predicted future air quality conditions as a baseline from which to determine the effects of the completed and operational Proposed Development.</p> <p>The London Borough of Camden is currently undertaking long-term monitoring at a number of automatic and diffusion tube monitoring sites within its administrative boundary. Whilst there are not any monitoring sites within the immediate vicinity of the Proposed Development, there are monitoring sites within 3km in locations with similar air quality conditions to the application site, i.e., at a distance from any nearby major sources of pollution. Given the fact that these monitoring sites have been deployed for a number of years (i.e., long-term), and that the verification of the modelled results will utilise 2022 (or 2023 should data be available) as the baseline year, the judgement of the air quality consultant is that undertaking a monitoring survey is not necessary. Instead, the sites that are deemed representative of conditions at the Proposed Development will be used in the verification, where traffic information in the London Atmospheric Emissions Inventory (LAEI) for the roads adjacent these sites is available.</p> <p>Air quality monitoring (and subsequent verification) for NO<sub>2</sub> and particulate matter as part of future demolition and construction stages is expected to form a commitment by the Applicant as part of the Environmental Statement which will accompany the planning application.</p> <p>In order to ensure this monitoring is completed, the Applicant is already in discussions with Camden's Air Quality Officer for the provision of air quality monitoring to commence. This is expected to include monitoring before/during construction (which is likely to cover particulate matter/dust).</p>
	<p>Comment 5: Consideration should be made to the WHO Guideline values in place at the time of the publication of the London Plan 2021. For the assessment of impacts of a development on PM<sub>2.5</sub> – the 2005 WHO guideline value of 10 µg/m<sup>3</sup> should be used as the Air Quality Assessment Level, i.e. the impact descriptors (EPUKIAQM) should be those relevant to 10 µg/m<sup>3</sup>. This means that a smaller contribution from a development to PM<sub>2.5</sub> would be considered more severe than if the AQO of 25 µg/m<sup>3</sup> were used. It should be noted that design features are preferable to energy intensive filtration systems where the guideline is exceeded.</p> <p>ACTION: Consideration of WHO Guideline Values required.</p>	<p>The air quality assessment, included within ES Volume 1, Chapter 8: Air Quality will take consider the WHO guideline for using 10 µg/m<sup>3</sup> for PM<sub>2.5</sub>. The modelling results will be compared with this value and results will be presented within the ES Chapter.</p>
	<p>Comment 6: Due to the scale and location it is expected that that at planning stage the applicant will submit in line with Camden Planning Guidance and London Plan Guidance:</p> <ul style="list-style-type: none"><li>• A detailed Air Quality Assessment</li><li>• Air Quality Positive statement</li><li>• Camden Air Quality proforma</li></ul> <p>The following CPG should be considered when completing the proforma:</p> <ul style="list-style-type: none"><li>• CPG Air Quality</li></ul>	<p>The required elements in this comment have been prepared and will be submitted for the planning application.</p>



## Camden Nature Corridor

Dear Christopher Smith,

**Re: West Kentish Town Estate Land bounded by Queens Crescent, Grafton Road, Althone Street, Rhyl Street, Weedington Road, Coity Road, Warden Road, Bassett Street and Allcroft Road London NW5  
ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT**

Thank you for your invitation to comment on this report.

Since the original EIA submission (2022/5281/P), a [proposal for a Camden Nature Corridor](#) has been developed by a consortium of local organizations and submitted in 2024 to Camden Local Plan Consultation. It includes suggestions for biodiversity improvement in five Camden Sites of Interest for Nature Conservation (including Talacre Town Green bordering WKTE) and in three priority Camden Site Allocations, Murphy's Yard, Regis Road and WKTE itself. Subsequently, [Camden Council has indicated its plans](#) to "include reference in the new local plan to the Camden Nature Corridor as an infrastructure priority for the "Central Area" within which the three sites referred to are located ... [and] ... to include reference to the Corridor within each of the respective site allocations". Hence, as WKTE is now proposed as a part of the Camden Nature Corridor, we request that it be scoped into the ecological work of the EIA for WKTE re-development.

We suggest three ways in which this could be done. There may be others.

First, the Camden Nature Corridor has been collecting biodiversity data on WKTE (e.g. bat and nesting bird survey data) for over a year. As this ecological data will be more comprehensive than the data on which the EIA can draw, we request that it be included and used in assessment of the ecological impact of planned development. Our ecological studies in WKTE are ongoing and we would be pleased to work collaboratively with the organization(s) conducting the EIA on further surveys.

Secondly, we suggest that the EIA consider the potential impact of development on both species presently on the WKTE site *and* species encouraged and anticipated to establish there as a result of the Camden Nature Corridor, which include many [London Priority Species](#) for conservation. For example, with respect to bats, which are mentioned specifically in the EIA Scoping Addendum, our surveys have already identified Common Pipistrelle (*Pipistrellus pipistrellus*) as a species active in WKTE. Eight other protected London bat species are found in Hampstead Heath, the other "end" of the Nature Corridor, and the aim is to facilitate their spread, potentially into the WKTE.

Finally, the Camden Nature Corridor will need to work across three Site Allocations: WKTE, Regis Road and Murphy's Yard. The present Cumulative Scheme Map for the EIA includes Regis Road and

Murphy's Yard. In its recent [Regis Road Area Guidance: Addendum to the Kentish Town Planning Framework November 2024](#), the Council has specifically identified the inclusion of the Camden Nature Corridor on these sites. We suggest therefore that the WKTE EIA's consideration of these two Cumulative Schemes include a specific ecological element dealing with the Nature Corridor. We also note that the plan in this Addendum for Regis Road includes opening up new, direct access to these Schemes from West Kentish Town, and that it might now be considered a Tier 2 Cumulative Scheme.

Thank you for your consideration,

With best wishes,



**Prof Jeff Waage**  
for Camden Nature Corridor

*The Camden Nature Corridor is a consortium of Camden-based charities and community groups including the Heath & Hampstead Society, City of London Corporation Hampstead Heath, Mortimer Terrace Nature Reserve, Kentish Town City Farm and Friends of Talacre Town Green Horticultural Section.*

Metropolitan Police (excluding appendix which is available to view online)



Christopher Smith  
Planning Solutions Team

London Borough of **Camden** 2nd Floor,  
5 Pancras Square

Design Out Crime Office  
North West DOCO Office,  
Ruislip Police Station,  
The Oaks,  
Ruislip,  
HA4 7LE  
Telephone: 0208 7333703  
Email:  
DOCOMailbox.NW@met.pnn.police.uk  
www.met.police.uk  
Your ref: 2024/4887/P  
Our ref: NW 8351  
(28/11/2024)

Good afternoon,

Thank you for allowing me to comment on the proposed redevelopment of **West Kentish Town Estate Land bounded by Queens Crescent, Grafton Road, Althone Street, Rhyl Street, Weedington Road, Coity Road, Warden Road, Bassett Street and Allcroft Road London NW5.**

I have provided a scoping comment previously and have attached this to the response for reference.

The development falls within the policing ward of Gospel Oak.

The top reported crimes for the month of September 2024 (taken from the police UK website) were, violence and sexual offences, antisocial behaviour, burglary and vehicle crime. Other offences of note for this area include other theft, theft from the person, criminal damage and robbery

I have had previous meetings with the applicant. The comments and recommendations are from a crime reduction/prevention perspective only.

Please refer to Appendix A for relevant crime figures and legislation.

**Whereas I do not object to the development the design and layout needs to be carefully considered.**

The proposed location of the development lies to the South of Queens Crescent and is bordered to the East by Grafton Street and the West by Alcroft Road. The site extends to the edge of Athlone Street. It is a large and awkward site. Crime and anti-social behaviour are material considerations for this proposal, as seen from current crime figures

This location only a few streets away from Lismore Circus which has issues with gang activity, drugs and knife crime. I have conducted an environmental visual audit within the last two (2) years. This



area garnered local press attention a couple of years ago when the Mayor of London was present during a weapon sweep and two (2) zombie knives were discovered in close proximity to a children's play park. Ensuring the site has good natural surveillance and legitimate activity will be vital to ensure an antisocial element does not take hold. A secure by design condition can assist in supporting this.

For the general site as a whole recommend the following:

- Separation of public realm and residential will be key. There should be no areas of crossover that could lead to potential conflict. This site will be a very permeable site and it is imperative that the space be activated from ground floor to ensure it remains legitimate. This will provide good natural surveillance. Permeability in the form of footpaths needs to be considered carefully as 'leaky' developments (with secluded footpaths) can be a breeding ground for anti-social behaviour and crime. A multi-use common access route is preferred where there is vehicular movement, pedestrian traffic and cycle lanes. This enables a good level of vehicle use and footfall boosting the natural surveillance along key routes into the site. There should be no separate footpaths as these are often poorly overlooked and can be flash points for street crime including robbery type offences as well as sexual assault and other violent crime.
- Landscaping to provide clear access routes with excellent lines of sight. Visibility lowers the fear of crime. There should be no opportunities for concealment which could increase the risk of robbery, burglary and theft. Concealment also includes the stashing of weapons, drugs and other illicit items.
- Lighting will also be important within this development and externally should meet BS 5489-1 2020.

For the residential blocks I recommend:

- Security rated main entrance door sets to either LPS 1175 Issue 8 B3 (SR2) or STS 202 Issue 10 BR2.
- Secure lobby areas which incorporate a second door (leading from the main communal front entrance) to be certificated to either PAS24:2022 or LPS 2081 SRB.
- Compartmentation to be implemented on all residential blocks above fifteen (15) units or more
- Triple certificated front doors to the residential units to cover security (PAS24:2022), fire and smoke.
- Cycle and bin stores need to be secure and a security rating of either LPS 1175 Issue 8 B3 (SR2) or STS 202 Issue 10 BR2 is strongly recommended especially if externally accessed.

For commercial elements I recommend the following:

- I strongly recommend a roller shutter or retractable grille for this location certificated to LPS 1175 issue 8 B3 or STS 202 issue 10 BR2. Consider also anti-graffiti treatments for the facades.
- CCTV with complimentary lighting to be considered for the exterior/entrance and communal areas (internal). A formal, overt CCTV system should be installed and maintained by a member company of either the National Security Inspectorate (NSI) or the Security Systems and Alarms Inspection Board (SSAIB). Any such company will install a system to the British Standard. Images should be retained for a minimum of 30 days. This system would need to

be registered with the Information Commissioner's Office, as it could/would be recording public areas. Appropriate signage indicating this fact needs to be displayed.

- An intruder alarm/motion detection is also recommended for the relevant structures on site, to notify security/central monitoring of any activation to a prohibited area, outside of operating hours, unguarded ingress/egress points and so on. The alarms need to be compliant with PD 6662 scheme for the application of European standards for intruder and hold up alarms. Installers need to be members of either the National Security Inspectorate (NSI) or the Security Systems and Alarms Inspection Board (SSAIB) and fitted to BS 50131. Burglary is a current priority for the ward and having the commercial units set up with an intruder alarm system is recommended. It is understood that these often come with subscription fees and this will need to be factored in by the potential tenant.

**It is strongly recommended that this location have security rated products to mitigate against the risk of theft and other forms of acquisitive crime to provide some protection for residents that will be housed at this location.**

The above are general security advice as there is currently little detail with this submission.

I am happy to make recommendations for this development through further consultation with the applicant.

**I recommend that the following conditions be placed upon this application.**

1. Prior to construction proof that the plans can achieve secured by design accreditation must be submitted to the design out crime officer and local planning office.
2. For the site to achieve a secured by design accreditation to silver award and to maintain this standard through the life of the development.

If this application is successful I am happy to assist both the applicant and local planning authority with crime prevention advice and guidance, where this assistance remains free of charge.

Further consultation is required in the pursuit of achieving SBD certification for the development is a requirement. If yourself or the applicant wishes to discuss any of my recommendations further then please feel free to contact me. The advice I have provided has been taken from the following guides:

<https://www.securedbydesign.com/images/HOMES%20GUIDE%20May%202024.pdf>

[https://www.securedbydesign.com/images/COMMERCIAL\\_GUIDE\\_2023\\_web.pdf](https://www.securedbydesign.com/images/COMMERCIAL_GUIDE_2023_web.pdf)

The advice has been adjusted taking into consideration crime statistics and analysis of the area.

Kind regards

Aran

## Historic England (GLAAS)

Dear Christopher,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2023

West Kentish Town Estate Land bounded by Queens Crescent, Grafton Road, Althone Street, Rhyl Street, Weedington Road, Coity Road, Warden Road, Bassett Street and Allcroft Road London NW5

*EIA Addendum to request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the redevelopment of the West Kentish Town Estate to provide up to approximately 898 dwellings (with a mix of affordable and market housing) and ancillary commercial uses in buildings ranging from 4 to 14 storeys in a variety of different housing typologies including flats and maisonettes alongside new routes, open space, play space, hard and soft landscaping and other associated works. AMENDMENT - EIA Scoping Addendum received.*

GLAAS Archaeological Advice: Recommend Scope Archaeology out of EIA

Thank you for your consultation received on 07 November 2024.

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice in accordance with the National Planning Policy Framework and GLAAS Charter.

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The application site is not located within an Archaeological Priority Area, and the surrounding area has low archaeological potential.

None of the proposed amendments to the scheme will have a material impact on the archaeological resource. I therefore maintain the recommendation that Archaeology can be scoped out of the ES.

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

Yours sincerely

Greer Dewdney

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

## NHS

Dear Christopher

**SITE:** West Kentish Town Estate, London, NW5

**DEVELOPMENT:** EIA Addendum to earlier request for scoping opinion (ref. 2022/5281/P) under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the redevelopment of the West Kentish Town Estate to provide up to approximately 898 dwellings (with a mix of affordable and market housing) and ancillary commercial uses in buildings ranging from 4 to 14 storeys in a variety of different housing typologies including flats and maisonettes alongside new routes, open space, play space, hard and soft landscaping and other associated works.

HUDU, on behalf of the NHS, are interested in development which has the potential to impact on population health, and healthcare capacity and delivery.

We note that the previous EIA Scoping Opinion agreed to the decision to scope Human Health out of the EIA, because a Health Impact Assessment would also be conducted, and it was not anticipated that any impacts would be significant.

Notwithstanding the NHS considers it important to raise that healthcare infrastructure capacity in North Central London is constrained. It is therefore important that the impact NHS healthcare infrastructure and service delivery are properly assessed in any subsequent assessment. This includes health services delivered to residents within and in the vicinity of the site that could be directly affected by both construction and operational phases of development.

HUDU and North Central London ICB value ongoing engagement with the Council and would be pleased to be involved in any pre-application discussions to discuss the scope of any subsequently submitted HIA and aid adequate assessment of healthcare capacity.

Please let me know if you require any further information or wish to discuss this response.

Yours sincerely,

*S Smith*

**Sam Smith**

Planning Manager

NHS London Healthy Urban Development Unit.



Natural England (excluding annex which is available to view online)

Date: 19 November 2024  
Our ref: 493573  
Your ref: 2024/4887/P

Mr Christopher Smith  
London Borough of Camden  
[Planning@camden.gov.uk](mailto:Planning@camden.gov.uk)

**BY EMAIL ONLY**



Consultations  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 8GJ

T 0300 060 900

Dear Mr. Smith,

**Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017):** EIA Addendum to request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the redevelopment of the West Kentish Town Estate to provide up to approximately 898 dwellings (with a mix of affordable and market housing) and ancillary commercial uses in buildings ranging from 4 to 14 storeys in a variety of different housing typologies including flats and maisonettes alongside new routes, open space, play space, hard and soft landscaping and other associated works. AMENDMENT - EIA Scoping Addendum received.  
**Location:** West Kentish Town Estate, London NW5

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 07 November 2024, received on the same date.

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

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

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

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

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

Please send any new consultations or further information on this consultation to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Nikki Smart  
Consultations Team

## Environment Agency

creating a better place  
for people and wildlife



Christopher Smith  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

**Our ref:** NE/2024/137604/01  
**Your ref:** 2024/4887/P

**Date:** 14 November 2024

Dear Christopher,

**West Kentish Town Estate Land Bounded by Queens Crescent, Grafton Road, Athlone Street, Rhyl Street, Weedington Road, Coity Road, Warden Road, Bassett Street and Allcroft Road London NW5.**

**EIA Addendum to request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the redevelopment of the West Kentish Town Estate to provide up to approximately 898 dwellings (with a mix of affordable and market housing) and ancillary commercial uses in buildings ranging from 4 to 14 storeys in a variety of different housing typologies including flats and maisonettes alongside new routes, open space, play space, hard and soft landscaping and other associated works.**  
**AMENDMENT - EIA Scoping Addendum received.**

Thank you for consulting us on the above Environmental Impact Assessment addendum on 7 November 2024.

Based on the information currently available, the development raises no environmental concerns for us. We therefore have no comments on the scope of the Environmental Statement.

### **Final comments**

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence.

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

Yours sincerely,

**Isable Smith**  
**Planning Advisor**

Email: [HNL.SustainablePlaces@environment-agency.gov.uk](mailto:HNL.SustainablePlaces@environment-agency.gov.uk)  
Direct Dial: 020 7714 2206



Historic England

Christopher Smith  
London Borough of Camden  
Development Management  
Town Hall, Judd Street  
London  
WC1H 9JE

Our ref: PL00797363

25 November 2024

Dear Christopher Smith

**Re: West Kentish Town Estate Land bounded by Queens Crescent, Grafton Road, Althone Street, Rhyl Street, Weedington Road, Coity Road, Warden Road, Bassett Street and Allcroft Road London NW5**

**ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT**

Thank you for your letter of 7 November 2024 consulting us about the above EIA Scoping Report.

This development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

Our initial assessment shows the application site lies within the protected vista from Parliament Hill (east of the summit - at the prominent oak tree) to the Palace of Westminster. Any potential future application should be considered especially carefully to ensure there is no harm to this protected vista. Tall elements that would impact it should be sited outside of the corridor.

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



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

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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



Historic England

([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)) and relevant local authority staff.

We would strongly recommend that you involve the Conservation Officer of Camden and the Greater London Archaeology Advisory Service in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Given the heights of the structures associated with the proposed development and the surrounding landscape character, this development is likely to be visible across a very large area and could, as a result, affect the significance of heritage assets at some distance from this site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

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

Yours sincerely,



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

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Nina Dierks  
Assistant Inspector of Historic Buildings and Areas