

CAMDEN GOODS YARD

A stylized illustration of a building facade, rendered in shades of red and white. The building features two rows of arches. The top row consists of five arches, and the bottom row consists of six arches. The arches are arranged in a perspective that recedes into the distance. The text 'CAMDEN GOODS YARD' is written in a large, white, sans-serif font, slanted upwards, across the top of the building's facade.

CAMDEN GOODS YARD

ENVIRONMENTAL IMPLICATIONS

LETTER

March 2025

Christopher Smith
Regeneration and Planning
London Borough of Camden
2nd Floor, 5 Pancras Square
Judd Street
London
WC1H 9JE

Dear Christopher,

**ENVIRONMENTAL IMPLICATIONS LETTER: PROPOSED SECTION 73
APPLICATION IN RESPECT OF PLANNING CONSENT 2022/3646/P
CAMDEN GOODS YARD**

We write to you on behalf of St George West London Limited (the 'Applicant') regarding the proposed application to be made under Section 73 (S73) of The Town and Country Planning Act 1990 (the 'Act') in respect of the 'Camden Goods Yard' project

The S73 application (the 'February 2025 S73 application') comprises proposed amendments in respect of Blocks C, D, E1, E2 and F of the Main Site Parcel ('MS Parcel') of the Camden Goods Yard project.

The Camden Goods Yard project was granted full planning consent in June 2018 (the 'June 2018 Consented Scheme') (planning reference: 2017/3847/P). This consent was subsequently superseded by minor material amendments made to the:

- Petrol Filling Station Parcel ('PFS Parcel') (planning reference: 2020/0034/P) granted consent on 5 May 2020, resulting in the 'May 2020 Consented Scheme';
- MS Parcel (planning reference: 2020/3116/P) granted consent on 3 December 2020, resulting in the 'December 2020 Consented Scheme'; and
- PFS Parcel (planning reference 2022/3646/P) granted consent on 29 March 2023, resulting in the 'March 2023 Consented Scheme'.

In addition, a series of other amendments have been made via non-material amendment ('NMA') applications made under S96A of the Act and two full applications (one of which is currently subject of determination).

The proposed amendments now sought through the February 2025 S73 application would seek to amend the extant permissions for the Camden Goods Yard Project.

As the Camden Goods Yard Project was subject to environmental impact assessment (EIA), this Environmental Implications Letter (EIL), also referred to as a Statement of Compliance (SoC), has been prepared by Ramboll and the technical specialist team, on behalf of the Applicant. The EIL reports on the implications of the proposed amendments and of the Amended Proposed Development as a whole (the 'February 2025 Amended Proposed Development') in respect of the conclusions of the EIA that was undertaken of the June 2018 Consented Scheme, so that the London Borough of Camden (LBC) has appropriate

Date 04/03/2025

Ramboll
240 Blackfriars Road
London
SE1 8NW
United Kingdom

T +44 20 7808 1420
www.ramboll.co.uk

Ref 1620017461_4_Camden
Goods Yard 2025 S73_EIL

Ramboll UK Limited
Registered in England & Wales
Company No: 03659970
Registered Office:
240 Blackfriars Road
Lonn
SE1 8NW

and up-to-date environmental information on the February 2025 Amended Proposed Development's environmental effects, to enable the determination of the February 2025 S73 application. As part of this process, consideration has also been given to the three previous EILs that were prepared, in respect of the May 2020 Consented Scheme, the December 2020 Consented Scheme and the March 2023 Consented Scheme, accounting for the cumulative scheme changes and EIA (as amended).

Table 7 presents the outcomes of the updated EIA of the February 2025 Amended Proposed Development. For ease of reference, Table 1 provides a summary of the conclusions that have been reached.

Table 1: Summary of Environmental Implications of February 2025 Amended Proposed Development	
Environmental Topic	Summary of Environmental Implications
Socio-Economics	<p>There would be decreases in:</p> <ul style="list-style-type: none"> FTE construction jobs, from 130 to 125 FTE jobs; the number of homes, from 644 to 637, and provision of affordable housing, from 38 % to 15 % by habitable room (from 203 to 83 homes); the estimated residential population, from 1,328 to 1,233; and the number of children anticipated to live on-site, from 243 to 140. <p>There would be an increase in:</p> <ul style="list-style-type: none"> Gross Value Added (GVA) equivalent total of £171 million contributed to the Greater London economy, increasing from £117 million GVA. <p><i>However, no changes are reported to the predicted scale of effects.</i></p>
Transport and Accessibility	<p>There would be decreases in:</p> <ul style="list-style-type: none"> vehicle trip generation in peak hours and daily: <ul style="list-style-type: none"> AM Peak: -1 two-way vehicle movements PM Peak: no change Daily: -1 two-way vehicle movements peak hour/daily trips by walking, cycling and public transport (noting the reduction in the overall number of homes). <p><i>However, no changes are reported to the predicted scale of effects.</i></p>
Air Quality	<i>No changes are reported to the predicted scale of effects</i>
Noise and Vibration	<i>No changes are reported to the predicted scale of effects</i>
Daylight, Sunlight, Overshadowing and Solar Glare	<i>No changes are reported to the predicted scale of effects</i>
Wind Microclimate	<i>No changes are reported to the predicted scale of effects</i>
Townscape and Visual	<i>No changes are reported to the predicted scale of effects</i>
Built Heritage	<i>No changes are reported to the predicted scale of effects</i>

1. Background

In June 2017, a full planning application (ref: 2017/3847/P) was submitted by Safeway Stores Limited and BDW Trading Limited (the 'former Applicant') to the LBC for the redevelopment of a 3.26 hectare (ha) site located off Chalk Farm Road, adjacent to Juniper Crescent and Gilbeys Yard in Chalk Farm, Camden ('the application site') to deliver the following:

- MS Parcel: 573 residential homes (60,568 m² gross external area (GEA)); office space (4,867 m² GEA); workshops (779 m² GEA); affordable workspace (565 m² GEA); a Morrisons Supermarket

(19,963 m² GEA); retail (787 m² GEA); community centre (86 m² GEA); and an urban farm (1,298 m² GEA); and

- PFS Parcel: retail (1,627 m² GEA); office (8,114 m² GEA); and winter garden (329 m² GEA).

The proposed development was to be delivered over eight blocks, ranging from five to 14 storeys.

The application was accompanied by an Environmental Statement (the 'ES'), which reported on the outcomes of the EIA undertaken in accordance with the 2011 EIA Regulations (as amended in 2015) (hereafter referred to as the '2017 EIA/ES').

Despite assessment of a combined heating and power (CHP) plant in the 2017 EIA/ES, the planning consent was granted for a scheme which uses air source heat pumps (ASHP) and gas boilers.

After the grant of planning consent in June 2018 (the 'June 2018 Consented Scheme'), the following two applications were submitted to LBC between January 2019 and June 2019 for NMAs to the June 2018 Consented Scheme:

- 6 February 2019 Section 96A (S96A) application to make non-material amendments to the wording of planning conditions 47, 48 and 49 (2019/0153/P); and
- 4 July 2019 S96A application to make non-material amendments to planning conditions 29, 50 and 60 (2019/2962/P).

Both applications were granted planning consent. Due to the non-material and insignificant nature of these amendments, the 2017 EIA/ES was not updated. The Applicant was subsequently selected by Morrisons to deliver the June 2018 Consented Scheme.

In December 2019, the Applicant submitted a NMA application (planning ref: 2019/6301/P) to amend the June 2018 Consented Scheme description relating to the PFS Parcel.

This was followed in January 2020 by a S73 application (planning ref. 2020/0034/P) in respect of changes to the PFS Parcel. The amendments to the PFS Parcel were in respect of the construction start date; the construction method of the temporary store; the operational period of the temporary store; car parking provision; and delivery access arrangements.

An updated EIA was undertaken and reported in an EIL (the 'January 2020 EIL'). The January 2020 EIL concluded that the Amended Proposed Development as a whole would not alter the conclusions of the 2017 EIA/ES. Therefore, the 2017 EIA/ES remained valid. The application was granted planning consent on 5 May 2020 (the 'May 2020 Consented Scheme').

This was followed by:

- A S96A application (planning ref. 2020/20325/P) relating to the relocation of the supermarket at the PFS Parcel, which was consented in June 2020; and
- A S96A application (planning ref. 2020/2786/P) to vary the description of development relating to the MS Parcel, which was consented in July 2020.

A second S73 application was submitted in July 2020 (planning ref. 2020/3116/P) in respect of changes to the MS Parcel. In summary, the amendments comprised the delivery of 71 additional residential homes; alterations to the basement levels and layout, the building heights, the non-residential floorspace, amenity space and parking provision, as well as updates to the Energy Strategy. An updated EIA was undertaken and reported in an EIL (the 'July 2020 EIL'). The July 2020 EIL concluded that the Amended Proposed Development as a whole would not alter the conclusions of the 2017 EIA/ES. Therefore, the 2017 EIA/ES remained valid. The application was granted planning consent on 3 December 2020 (the 'December 2020 Consented Scheme').

In February 2022, the Applicant submitted a NMA application (planning ref: 2022/0673/P) to amend the December 2020 Consented Scheme's description of development, to facilitate the changes proposed in a

third S73 application, namely the proposed removal of the PFS at the PFS Parcel. This NMA application was consented in February 2022.

The third S73 application was submitted in August 2022 (planning ref. 2022/3646/P). In summary, the amendments comprised the removal of the PFS, the reconfiguration of the ground floor layout to accommodate improved office and retail floorspace, extending the proposed building by 6 m to create additional floorspace, the introduction of a new mezzanine level to the first floor level, the addition of ground floor windows to the western elevation, as well as additional minor reconfigurations and rationalisations of floorplans and plant layouts. No amendments were proposed to the MS Parcel. An updated EIA was undertaken and reported in an EIL ('the August 2022 EIL'). The August 2022 EIL concluded that there were no new or amended significant environmental effects arising from the Amended Proposed Development as a whole. Therefore, the 2017 EIA/ES remained valid. The application was granted planning consent on 29 March 2023 (the 'March 2023 Consented Scheme').

The August 2022 EIL was followed by:

- A NMA application (planning ref. 2022/4273/P) relating to NMAs to Blocks A, B and C at the MS Parcel. These comprised minor adjustments to window positioning, insertions of and relocations of entrance/exit doors, alterations to Morrisons car park entrance, additional Urban Farm lift, minor fenestration changes to residential and office windows, and reconfiguration of office cycle parking and terrace doors in Block A. This was granted consent in December 2022;
- A NMA application (planning ref. 2022/5571/P) relating to minor amendments to the affordable workspace layout in response to physical ground obstructions, and the addition of 370 m² of floorspace, via the insertion of a mezzanine. This was granted consent in March 2023;
- A full planning application (planning ref. 2023/1099/P) for the temporary change of use in Block A, at the MS Parcel, of a retail unit on ground and mezzanine floors, and of two residential homes of the second floor level to a sales and marketing suite, for a period of ten years commencing January 2024. Full planning permission was granted on 9 May 2023;
- A NMA application (planning ref. 2023/1560/P) for NMAs to the Block B Urban Farm, rearrangement of the internal floor space, reorientation of the greenhouse roof pitch, introduction of flexible space for educational and/or event space, and adjustment of the external growing area to include vertical planting and seating. Also included alterations to the Block B balcony design, including minor increase to the depth of the balconies by up to 161 mm, to a total of 1,500 mm deep. This was granted consent in April 2023;
- A NMA application (planning ref. 2023/2596/P) for a variation to the wording of the development description at the PFS Parcel, amendments to conditions 19 and 46 wording, and minor alterations to spandrel panel in Block A, following the March 2023 Consented Scheme. This was granted consent in December 2023;
- A NMA application (planning ref. 2024/2791/P) for the replacement of a window from a single bay in Block A of the MS Parcel with a solid precast panel, matching the surrounding precast finish, which was granted consent in August 2024;
- A NMA application (planning ref. 2024/4241/P) relating to NMAs to the fenestration and layouts at ground floor level at Block A, MS Parcel, comprising new residential/commercial bin store layouts, relocation of concierge store area, addition of new door between plant and bike store, and an increase in workshop unit floorspace by approximately 40 m² due to relocation of the concierge store area. This was granted consent in November 2024; and
- A full planning application (planning ref. 2024/4323/P) to extend the operation of the existing temporary Morrisons supermarket store by 25 months, from 50 to 75 months, at the PFS Parcel, while the new supermarket store is being constructed on the MS Parcel. Determination is currently awaiting determination at the time of submission.

The March 2023 Consented Scheme was the last version of the scheme that was subject to EIA, the updated EIA presented in this EIL considers the March 2023 Consented Scheme as the basis of assessment.

Accordingly, this EIL considers the proposed amendments to the MS Parcel, as well as the amendments made post the August 2022 EIL, to report on the environmental implications of the February 2025 Amended Proposed Development as a whole.

The 2017 EIA/ES, as updated by the January 2020 EIL, the July 2020 EIL and the August 2022 EIL, is hereafter collectively referred to as the '2017 EIA/ES (as amended)'.

2. Site Description

The redline boundary remains unchanged for the February 2025 Amended Proposed Development.

The first two blocks (A and B) at the MS Parcel are currently under construction and include the new proposed Morrisons basement and supermarket store. The upgrade to the highways on Stephenson Street is also currently underway.

The remainder of the MS Parcel (Blocks C, D, E1, E2 and F) (see Figure 1) is yet to be built out, and currently comprises construction compounds and areas of hardstanding.

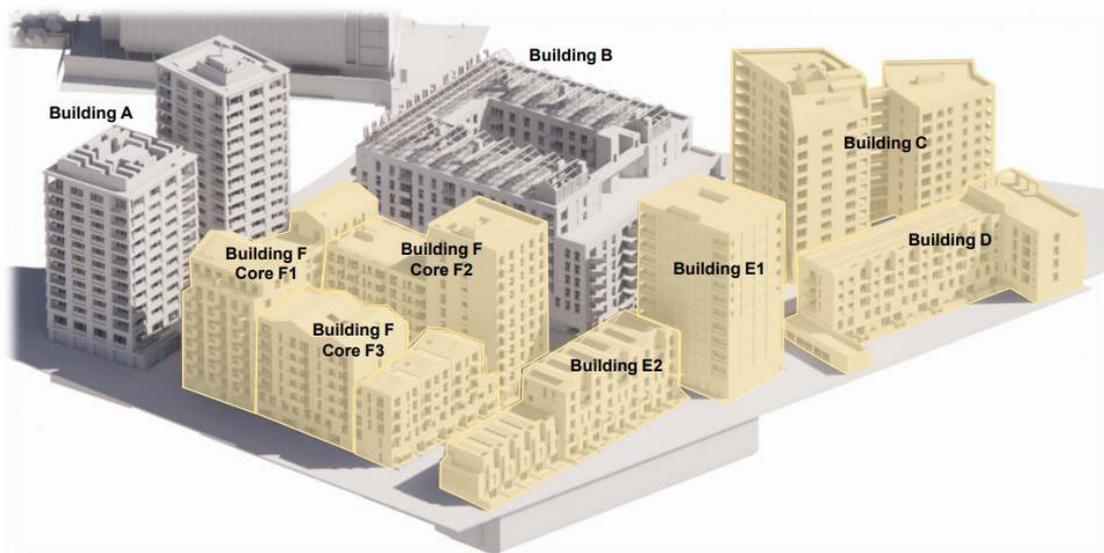


Figure 1: February 2025 Amended Proposed Development MS Parcel Site Layout

The PFS Parcel is currently in use as the temporary Morrisons food store following its opening in February 2021. The temporary food store is anticipated to be operational until Q4 2026, although a full planning application (planning ref. 2024/4323/P) has been submitted to extend the operation of the existing temporary Morrison's supermarket store by 25 months, from 50 to 75 months. If consented the temporary food store would be operational up to May 2027.

Construction has progressed on-site and baseline conditions will be subject to ongoing change. Accordingly, it is not meaningful to undertake an updated EIA against a changing existing baseline. Therefore, and consistent with the approach adopted previously, the updated EIA has been undertaken against the on-site baseline conditions presented in the 2017 ES. This approach is more conservative, but robust and enables a like-for-like comparison with the 2017 EIA/ES (as amended). However, the surrounding study area baseline conditions have been updated where appropriate and necessary.

3. Proposed Amendments

The February 2025 S73 application proposes the following amendments in respect of Blocks C, D, E1, E2 and F of the MS Parcel. No changes are proposed to the consented development on the PFS Parcel, nor at Blocks A and B of the MS Parcel.

- Block C:
 - Insertion of second staircase to comply with the latest fire safety guidelines for residential buildings, resulting in minor amendments to the residential floorplan layout;
 - Provision of external balconies in place inset balconies to the east elevation, in response to insertion of a second staircase;
 - Extension of terrace for four homes at first floor level, replacing previous green roof terrace, and which currently comprise inset balconies, therefore enhancing resident external amenity; and
 - Minor reduction in block height from 73.95 metres above ordnance datum (mAOD) to 73.35 mAOD, due to floor-to-floor height reduction from 3.15 m to 3.075 m.
- Block D:
 - Minor change to block's elevation arising from fire safety compliance, comprising removal of balconies from eastern end of south elevations; and
 - Minor reduction in block height from 54.30 mAOD to 53.90 mAOD due to floor-to-floor height reduction from 3.15 m to 3.075 m.
- Block E1:
 - Marginal increase to block footprint (0.5 m on the east, west, north elevations) as a result of the introduction of secondary staircase requirement, resulting in minor amendments to residential floor layout;
 - Relocation of Morrisons emergency escape stairs within Block E1 to external location between E1 and E2; and
 - Minor reduction in block height from 73.375 mAOD to 70.40 mAOD due to floor-to-floor height reduction from 3.375 m to 3.075 m.
- Block E2:
 - Minor reduction in block height from 52.95 mAOD to 52.20 mAOD for G+4 storeys section of the block due to a reduction in floor-to-floor heights from 3.15 m to 3.075 m; and
 - Minor reduction in block height from 45.45 mAOD to 45.075 mAOD for G+2 storeys section of the block due to a reduction in floor-to-floor heights from 3.15 m to 3.075 m.
- Block F:
 - Insertion of second staircase to accord with requirements of fire safety guidelines for residential buildings, resulting in minor amendments to residential floor layout; and
 - Minor reduction of block heights due to floor to floor height reduction from 3.15 m to 3.075 m, as follows:
 - Block F1: 68.213 mAOD to 67.914 mAOD;
 - Block F2: 73.875 mAOD to 72.075 mAOD for G+10 storeys section of the block;
 - Block F2: 60.606 mAOD to 58.785 mAOD for G+6 storeys section of the block; and
 - Block F3: 64.410 mAOD to 64.035 mAOD for G+6 storeys section of the block;
 - Block F3: 54.050 mAOD to 53.5511 mAOD for G+4 storeys of the block.

There would be a minor reduction in residential homes, from the 644 residential homes consented at the MS Parcel in the March 2023 Consented Scheme, to 637 residential homes, with an associated update in the unit and tenure mix, as shown in Table 2.

Unit Type	March 2023 Consented Scheme		February 2025 Amended Proposed Development		Variance	
	Homes (No.)	Homes (%)	Homes (No.)	Homes (%)	Homes (No.)	Homes (%)
Studio	61	9	57	9	-4	0
1 bed	248	39	247	39	-1	0
2 bed	238	37	239	37	1	0
3 bed	89	14	89	14	0	0
4 bed	8	1	5	1	-3	0
TOTAL	644	100	637	100	-7	0

Within the extant consented scheme of the 644 homes, 203 were secured as affordable homes and provided at 38 % affordable habitable rooms. The February 2025 Amended Proposed Development would deliver 83 affordable homes, of the proposed 637 total homes, which equates to 15 % by habitable room. Therefore, the February 2025 Amended Proposed Development represents a decrease of 23 % in affordable homes provision when compared with that set out in the March 2023 Consented Scheme, as presented in Table 3.

Type	March 2023 Consented Scheme	March 2023 Consented Scheme (% of Habitable Rooms)	February 2025 Amended Proposed Development	February 2025 Amended Proposed Development (% of Habitable Rooms)	Variance
Private Homes	441	62	554	85	+113 (+23%)
Affordable Homes	203	38	83	15	-120 (-23%)

The affordable housing tenure split would comprise:

- London Affordable Rent:
 - March 2023 Consented Scheme: 110 (number of homes);
 - February 2025 Amended Proposed Development: 23;
- Intermediate Rent:
 - March 2023 Consented Scheme: 93; and
 - February 2025 Amended Proposed Development: 60.

Table 4 presents a floorspace area schedule comparison for the March 2023 Consented Scheme (last assessed within the August 2022 EIL) and the February 2025 Amended Proposed Development.

Table 4: February 2025 Amended Proposed Development Area Schedule Comparison				
Land Use	March 2023 Consented Scheme		February 2025 Amended Proposed Development	
	GEA (m²)	GIA (m²)	GEA (m²)	GIA (m²)
MS Parcel				
Retail (A1-A3)	1,092	950	1,003	904
Morrisons Supermarket (A1) – Main Floorspace	18,246	17,715	19,963	17,709
Office (B1)	5,324	4,712	4,492	4,077
Affordable Office (B1a)	677	564	1,035	941
Workspace (B1c)	664	657	779	717
Urban Farm (<i>sui generis</i>)	1,894	1,515	1,435	1,304
Community Space	86	74	85	74
PFS Parcel				
Retail (A1, A3 and A4)*	1,048	1,110	1,048	1,110
Office (B1)	9,398	9,080	9,398	9,080
TOTAL	38,429	36,377	39,238	35,916

The February 2025 Amended Proposed Development has been remeasured, and the *de minimis* changes reflect the proposed amendments to floorspaces, as set out in Table 4. The residential floorspace still complies with the floorspace cap outlined in Condition 73.

Condition 73 also refers to a total of 27,983 m² GEA of non-residential floorspace for the MS Parcel. This is revised to 28,792 m², a *de-minimis* increase of 809 m² following re-measurement of the scheme and marginal building footprint increase to Block E1. It is also noted that the 2,680 m² GEA of ancillary (residential) floorspace (gym, concierge, plant room, parking and energy centre) previously referred to in condition 73¹ has unintentionally been omitted from the March 2023 Permission and is proposed for reinsertion for consistency, revised to 2,769 m² GEA.

However, the non-residential floorspace figure in Condition 73 is being updated as part of this S73 application. The proposed amendment to Condition 73 is set out within Section 6 (The Proposal) of the Planning Statement, prepared by Quod. The adjustments are considered *de minimis* and have no material effect as demonstrated in Table 7 of this EIL.

The demolition and construction programme has also been updated, with the year of completion changing from Q3 2028 for the March 2023 Consented Scheme, to Q3 2033, for the February 2025 Amended Proposed Development, as presented in Table 5.

¹ 2020/3116/P, dated 3rd December 2020

Table 5: Indicative Demolition and Construction Programme Comparison				
Works	March 2023 Consented Start Date	March 2023 Consented Completion Date	February 2025 Amended Proposed Development Start Date	February 2025 Amended Proposed Development Completion Date
MS Parcel				
Demolition and Enabling Works	Q2 2021	Q3 2022	Q3 2021	Q2 2022
Substructure and Basement	Q4 2021	Q2 2023	Q2 2022	Q3 2023
Supermarket Structure to Podium (Block B)	Q3 2022	Q4 2022	Q3 2022	Q2 2026
Block A Frame/Superstructure; Façade/Cladding; and Fit Out	Q4 2022	Q4 2024	Q2 2023	Q4 2025
Block B Frame/Superstructure; Façade/Cladding; and Fit Out	Q4 2022	Q2 2025	Q3 2023	Q4 2026
Block C Frame/Superstructure; Façade/Cladding; and Fit Out	Q2 2025	Q2 2027	Q2 2029	Q3 2031
Block D Frame/Superstructure; Façade/Cladding; and Fit Out	Q2 2026	Q1 2028	Q2 2031	Q4 2032
Block E1 Frame/Superstructure; Façade/Cladding; and Fit Out	Q4 2026	Q3 2028	Q4 2031	Q3 2033
Block E2 Frame/Superstructure; Façade/Cladding; and Fit Out	Q2 2027	Q3 2028	Q1 2032	Q3 2033
Block F Frame/Superstructure; Façade/Cladding; and Fit Out	Q4 2024	Q2 2027	Q1 2027	Q3 2028
Total Programme	Q1 2020	Q3 2028	Q3 2021	Q3 2033

There would also be an increase in short-stay and long stay cycle parking provision at the MS Parcel compared to the March 2023 Consented Scheme:

- Increase in residential short-stay provision, from 24 to 32 spaces; and
- Increase in residential long-stay provision, from 1,054 to 1,099 spaces.

There are no changes proposed to the commercial short stay (20 spaces) and long-stay provisions (78 spaces), nor any changes to the proposed supermarket short stay (38 spaces) and long stay (18 spaces) provisions.

The updated General Arrangement and Landscaping Plans for the MS Parcel are presented in Figures 2-6.

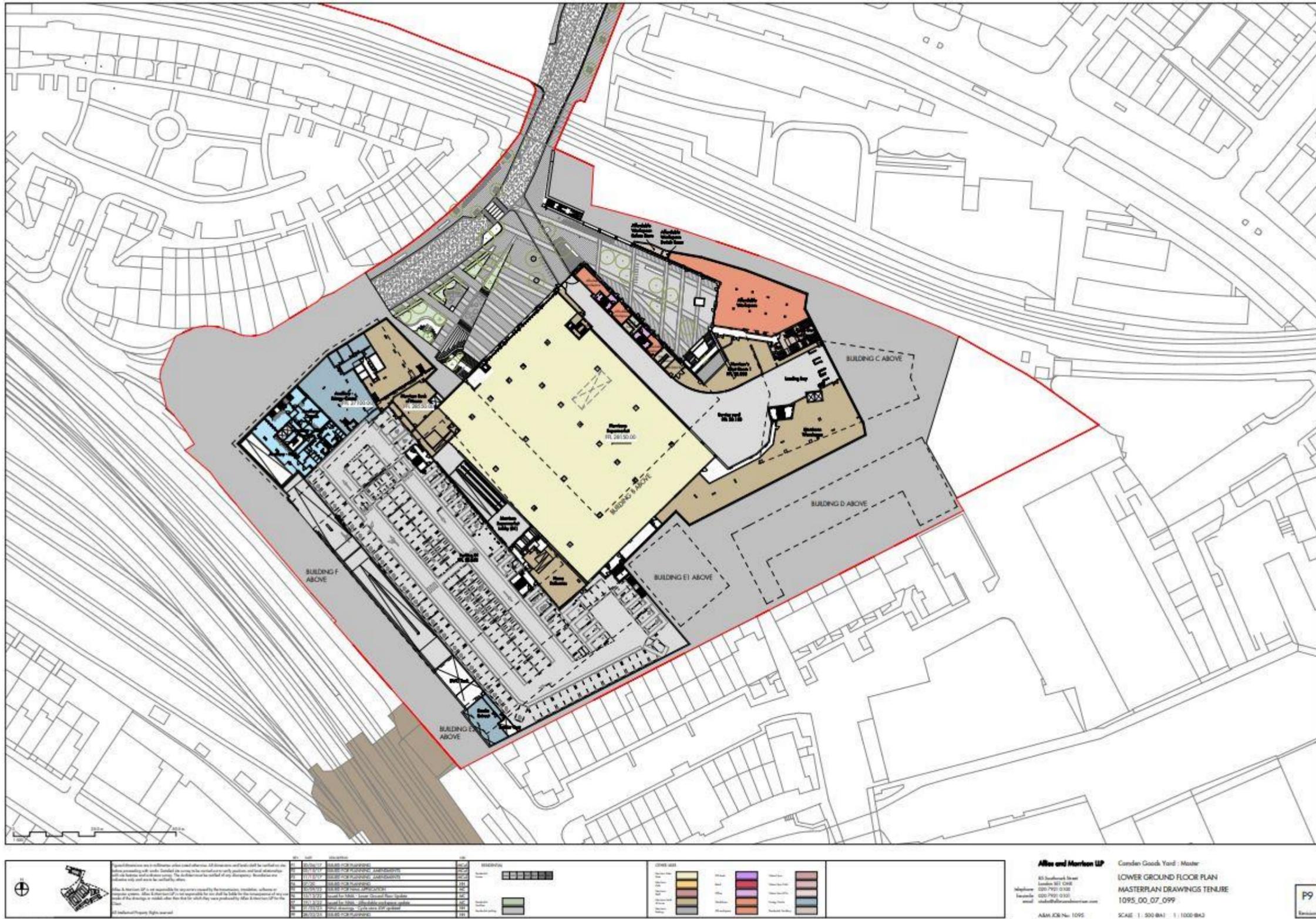


Figure 2: February 2025 Amended Proposed Development MS Parcel Lower Ground Floor Plan
 Drafting Office:
 240 Blackfriars Road
 Lonn
 SE1 8NW

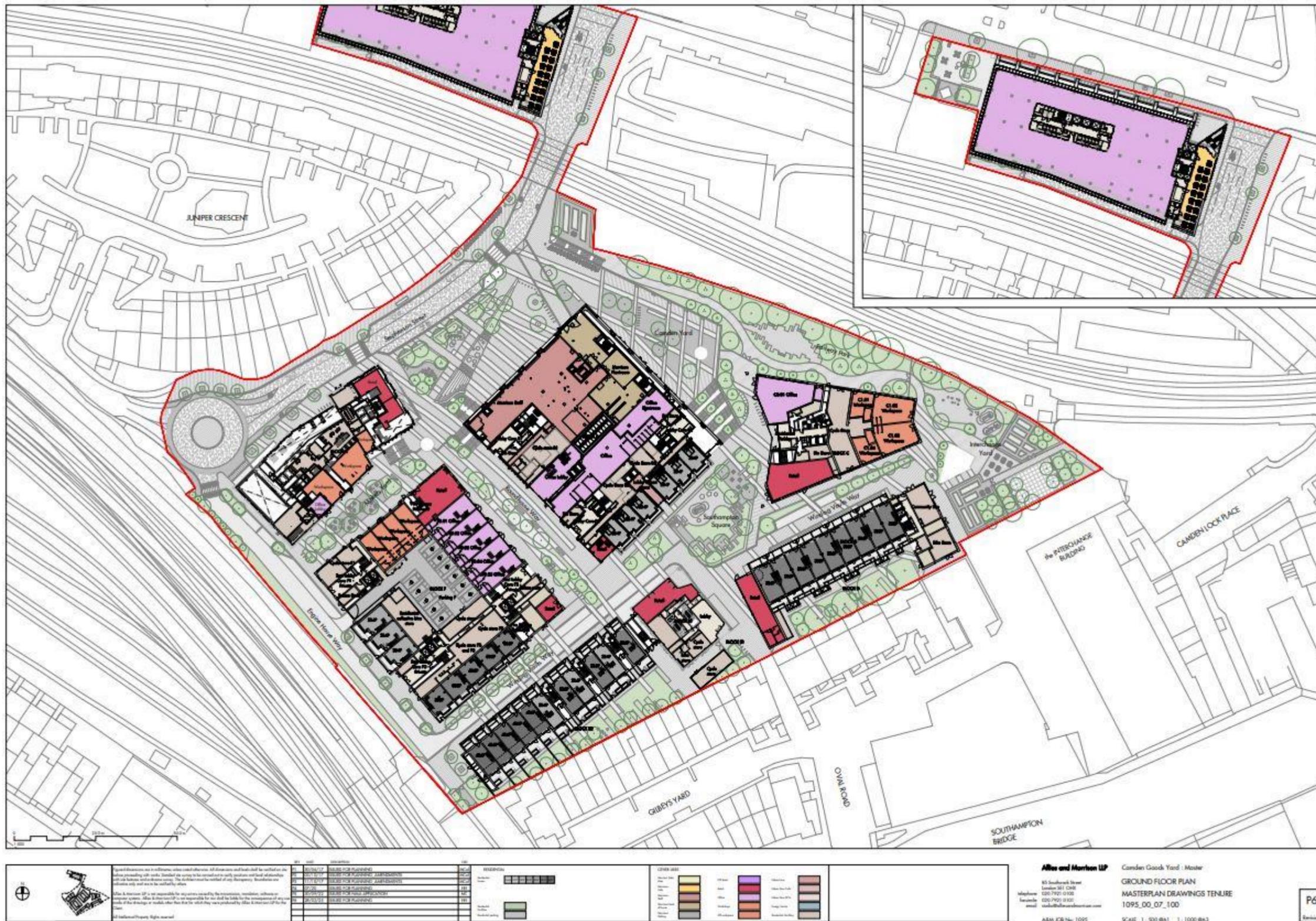


Figure 3: February 2025 Amended Proposed Development MS Parcel Ground Floor Layout

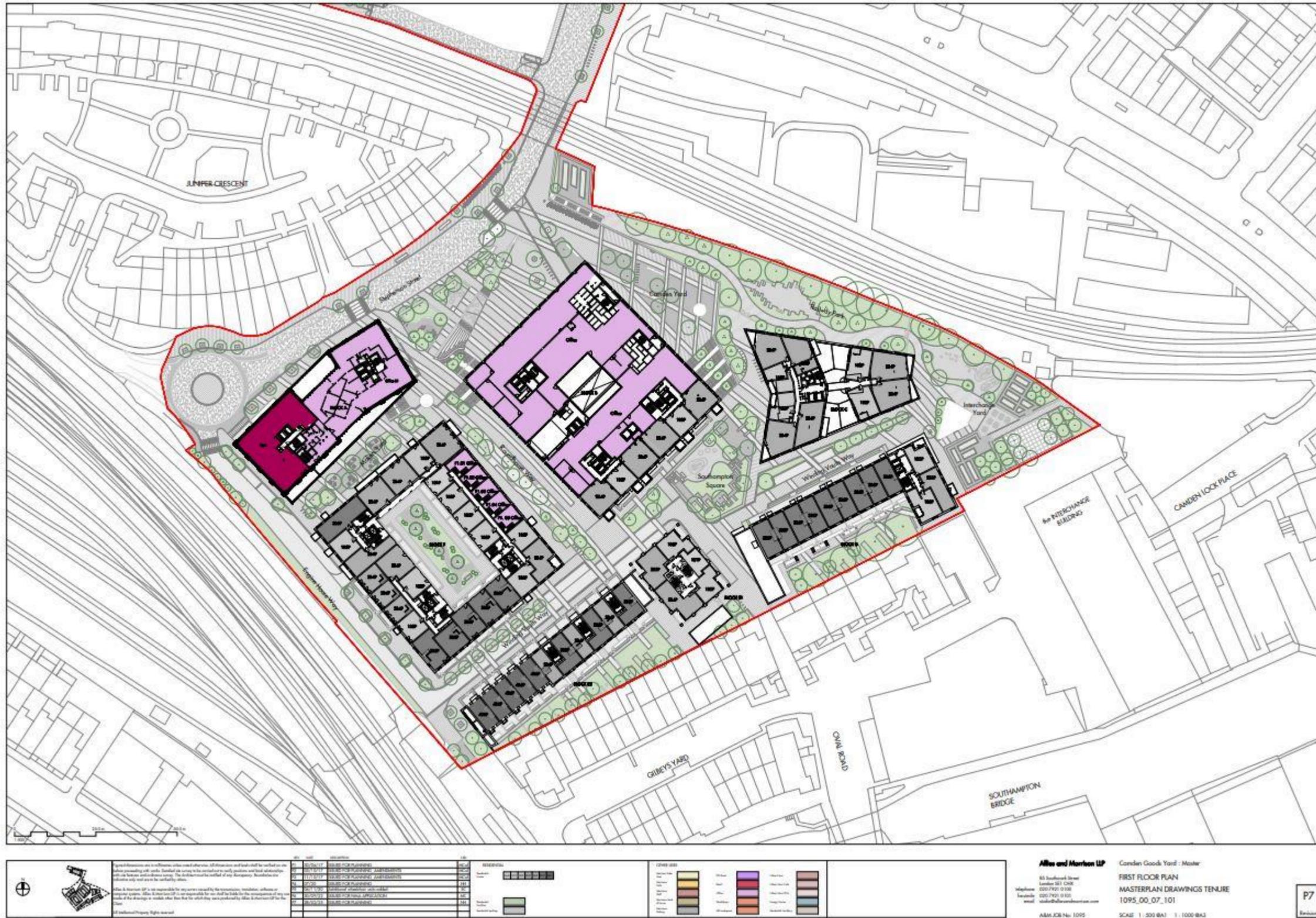


Figure 4: February 2025 Amended Proposed Development MS Parcel First Floor Layout



Figure 5: February 2025 Amended Proposed Development Landscape Masterplan



Scale 1:500
 0 5 15 30m

Baseline Information

Health & Safety Comments
 No specific comments

Legend

General	Paving boundary	Furniture	Seating element: Bench
Paving	Paving type 1: Granolithic slabs	Tables and chairs: Flexible seating	Tables and benches: Flexible seating
Paving type 2: Granolithic sets	Paving type 3: Dutch brick herringbone pattern	Play equipment	Railing: To provide barriers
Paving type 4: Granolithic slabs	Paving type 5: Self-bonding gravel	Fence / gate	Cycle stands
Paving type 6: Bark play surface	Paving type 7: Loose gravel	Fixed / retractable bollard	Planting
Paving type 8: Rubber play surface	Paving type 9: Private service granolithic sets	Lawn	Shrub & herbaceous groundcover
Paving type 10: Yorkstone to Juniper Building	Paving type 11: Tarmac	Wildflower meadow	Woodland planting
Paving type 12: Coloured tarmac	Paving type 13: Cycle path	Clipped hedge	Raised planter: To community garden
Paving type 14: Glass bricks	Paving type 15: Granolithic slabs	Trees	Existing tree
Paving type 16: Paving to adaptable standards	Slope	Proposed tree	
Kerb type 1: Granite kerb	Edge type 1: Steel edge		

Rev P: 24.02.20 Layout updated
 Rev D: 17.04.20 Revised for WFD site requirements
 Rev G: 04.11.20 Rev. Site usage parking spaces updated
 Rev C: 20.10.20 Layout updated
 Rev B: 08.07.20 Layout updated
 Rev A: 03.07.20 Layout updated

Camden Goods Yard
 Client: **St George**
 Drawing Title: **Landscape General Arrangement**
 Date: 26 June 2020
 Scale: 1:500 @ A1
 Drawn: MC
 Drawing No: 1573/101
 Rev: F

Figure 6: February 2025 Amended Proposed Development Landscape General Arrangement Plan

4. Approach to Consideration of Environmental Effects

Ramboll and the technical specialist team have reviewed the February 2025 Amended Proposed Development, whilst considering the implications for the likely environmental effects reported within the 2017 EIA/ES (as amended). Consideration has been given to:

- Changes to legislation, policy and assessment methodologies since the 2017 EIA/ES (as amended);
- Changes in baseline conditions since the 2017 EIA/ES (as amended);
- The conclusions of the 2017 EIA/ES (as amended); and
- Any changes to the 2017 EIA/ES (as amended) conclusions, as a result of the February 2025 Amended Proposed Development, as well as the updated list of cumulative schemes.

This EIL should be read alongside the 2017 EIA/ES (as amended). Due to the size of the 2017 EIA/ES (as amended), it has not been appended to this letter but can be provided in electronic format.

A summary of the updated, new or emerging legislation, policy and assessment guidance is presented in Section 5 (Legislation and Policy).

The changes in baseline conditions, the conclusions of the 2017 EIA/ES (as amended) and the updated conclusions as a result of the February 2025 Amended Proposed development are presented in tabular format in Section 6.

In respect of cumulative schemes, Table 6 presents the list of cumulative schemes considered for the updated EIA in respect of inter-project cumulative effects:

- The text in black reflects the cumulative schemes originally considered in the 2017 EIA/ES;
- The text highlighted in blue reflects amendments (i.e. S73) since the 2017 EIA/ES and captured in the January 2020 EIL;
- The text highlighted in green reflects amendments since the January 2020 EIL, captured in the August 2022 EIL;
- The text highlighted in red reflects further updated information, as of November 2023;
- The text highlighted in purple reflects further updated information, as of May 2024;
- The text highlighted in yellow reflects further updated information, as of December 2024; and
- The text highlighted in dark blue reflects the most recent updated cumulative scheme information that has been identified, as of January 2025.

In this regard, major developments are defined as schemes that:

- are consented/approved or have resolution to grant or are currently at early stage of construction; AND
- have a total floor space area of 10,000 m² GEA and/or comprise >150 residential homes; AND
- either:
 - are within 1 km of the redline boundary/application site; or
 - are spatially linked to the application site by means of the local road network; or
 - are visible in assessment views to and from the application site.

Several additional developments do not meet all the criteria above, but have been considered in previous updated EIAs due to meeting one or two of the thresholds (e.g. proximity to the proposed development), have also been included in Table 6 for completeness. These are marked with an asterisk.

Where cumulative schemes that are in the process of being built out or have already been completed, these have continued to be considered in the inter-project cumulative effects assessment for consistency and to enable a like-for-like comparison of the conclusions of the 2017 EIA/ES (as amended). These are marked in italics.

However, where consents have lapsed, or have been refused permission, these developments have been omitted from the cumulative assessment. The six lapsed or refused cumulative scheme consents are:

- Camden Lock Market Site, Chalk Farm Road, NW1 8NH;
- 100, 100a and 100b Chalk Farm Road, NW1 8EH;
- 5-17 Haverstock Hill, NW3 2BP;
- 160 Malden Road, NW5 4BT;
- 50A Haverstock Hill, NW3 2BH; and
- 139-147 Camden Road, NW1 9HJ.

Table 6: Cumulative Schemes			
<ul style="list-style-type: none"> • Black: List as per 2017 EIA/ES for original application (2017/3847/P) – refer to 2017 ES for detail • Blue: Updates to list of schemes, as per May 2020 S73 (2020/3116/P) • Green: Updates to list of schemes, as per March 2023 S73 (2022/3646/P) • Red: Updates to list of cumulative schemes as of November 2023 • Purple: Updates to list of cumulative schemes as of May 2024 • Yellow: Updates to list of cumulative schemes as of December 2024 • Dark Blue: Updates to list of cumulative schemes as of January 2025 			
No	Application Reference	Site/Description of Proposal	Application/Scheme Status
1	2015/4562/P (2016/3940/P and 2012/4628/P)	Site at Hawley Wharf Land bounded by Chalk Farm Road, Castlehaven Road, Hawley Road, NW1 8RP.	Built and complete
2	2015/4774/P and 2015/4812/L	Camden Lock Market Site, Chalk Farm Road, NW1 8NH.	Permission lapsed unimplemented
	2022/3853/P and 2022/3940/L	Introduction of new exhibition space, flexible events and market uses through a change of use of the existing East Vaults, installation of new retail shopfronts within West Yard; creation of a new jetty within Dead Dog Basin and erection of a temporary observation wheel for five years together with ancillary works and alterations to existing structures, surfaces and other public realm improvements and associated works.	Granted
3	2013/5403/P	100, 100a and 100b Chalk Farm Road, NW1 8EH.	Permission lapsed unimplemented
	2024/0479/P	Demolition of existing buildings and redevelopment of the site to provide two new buildings of between 6-12 storeys: one containing affordable homes (Class C3) and one (with three cylindrical volumes) containing purpose-built student accommodation with associated amenity and ancillary space (Sui Generis), a ground floor commercial space (Class E) together with public realm, access, plant installation, and other associated works.	Granted on 27/11/2024 subject to Section 106 Agreement
4	2016/2201/P (2016/7074/P, 2016/5890/P,	44-44a Gloucester Avenue, NW1 8JD.	Built and complete

Table 6: Cumulative Schemes

- Black: List as per 2017 EIA/ES for original application (2017/3847/P) – refer to 2017 ES for detail
- Blue: Updates to list of schemes, as per May 2020 S73 (2020/3116/P)
- Green: Updates to list of schemes, as per March 2023 S73 (2022/3646/P)
- Red: Updates to list of cumulative schemes as of November 2023
- Purple: Updates to list of cumulative schemes as of May 2024
- Yellow: Updates to list of cumulative schemes as of December 2024
- Dark Blue: Updates to list of cumulative schemes as of January 2025

No	Application Reference	Site/Description of Proposal	Application/Scheme Status
	<i>P2016/7089/P and 2015/1243/P</i>		
5	2016/3975/P*	5-17 Haverstock Hill, NW3 2BP.	Granted on 02/10/2018 subject to Section 106 Agreement. Under construction
	2020/5623/P	5-17 Haverstock Hill, NW3 2BP: new application for Demolition of existing building and erection of a development comprising residential (Use Class C3), Hotel (Use Class C1) and associated commercial, business and service (Use Class E, formerly Use Classes A1 and A3) with associated works.	Refused 28/03/2022
6	<i>2016/6891/P</i>	<i>1 Centric Close London NW1 7EP.</i>	<i>Built and complete</i>
7	<i>2015/0487/P</i>	<i>Marine Ices 4-8a Haverstock Hill & 45-47 Crogsland Road London NW3 2BL.</i>	<i>Built and complete</i>
8	<i>2015/0921/P</i>	<i>11 Crogsland Road London NW1 8HF.</i>	<i>Built and complete</i>
9	2016/5760/P and 2016/5761/L*	The Roundhouse Theatre Chalk Farm Road, NW1 8EH.	<i>Conditions discharged. Built and complete</i>
10	2017/1515/P*	28 Camden Wharf Jamestown Road, NW1 7BY (Ice Wharf building).	Resolution to grant at committee
11	2017/2155/P et al.*	Various minor exterior amendments at Long Stable Stables Market Chalk Farm Road, NW1 8AH.	Granted - construction/completion status unknown
12	2017/1407/P (2017/0492/P and 2014/7908/P)*	140-146 Camden Street, NW1 9PF	Under construction
	2017/6720/P*	S96A application to alter Block A lightwell and railings, omission of ground floor balcony, removal of courtyard lightwell, repositioning of Block B access, re-arrangement of wheelchair unit at ground floor, lighting design, addition of private terraces in courtyard, security fencing, commercial access repositioned, ground floor recess omitted, stair access to communal terrace added, changes to window design and faience columns and repositioning of lift.	Granted

Table 6: Cumulative Schemes

- Black: List as per 2017 EIA/ES for original application (2017/3847/P) – refer to 2017 ES for detail
- Blue: Updates to list of schemes, as per May 2020 S73 (2020/3116/P)
- Green: Updates to list of schemes, as per March 2023 S73 (2022/3646/P)
- Red: Updates to list of cumulative schemes as of November 2023
- Purple: Updates to list of cumulative schemes as of May 2024
- Yellow: Updates to list of cumulative schemes as of December 2024
- Dark Blue: Updates to list of cumulative schemes as of January 2025

No	Application Reference	Site/Description of Proposal	Application/Scheme Status
	2019/3403/P*	Variation of condition 2 (approved plans) and removal of condition 12 (lifetime homes) of planning permission ref. 2017/1407/P [internal layout changes and associated elevation changes].	Granted
	2019/5155/P*	Variation of Condition 2 (approved plans) and condition 7 (energy strategy) of planning permission 2017/1407/P	Granted
	2021/3265/P*	Alternations including amendments to ground floor layout involving replacement of 20sqm residential floorspace with commercial space, provision of door on Bonny Street and increased height of balustrading to planning permission ref. 2014/7908/P	Granted
	2021/5926/P*	Amendment of planning permission ref 2020/1105/P dated 22/12/20 (two storey roof extension to the elevation fronting Greenland Street and erection of first floor single storey rear extension; including associated internal reconfiguration to create three additional flats), to reduce depth of six balconies.	Granted
13	2015/6240/P (2015/3396/P, 2015/5160/P, 2015/3443/P, 2014/5730/P and 2013/8088/P)	Camden Collection, Agar Grove Estate, Site 1, Agar Grove, NW1 0RG	Under construction
	2015/3396/P	S96A application for changes to the levels, footprint, height, window positions, lowering of top canopy, fixing of previously movable screens and various other associated works	Granted
	2014/5730/P	S96A application for changes to the footprints, heights, window positions and cores of blocks A, F, G and H, building fold line and brick work on block A, and other associated works	Granted
	2019/4280/P	Variation of condition 60 (approved plans), 61 (Number and mix of residential homes) and 6 (lifetime homes) of planning permission 2013/8088/P [internal layout changes, increase by one storey, revised footprint and minor elevation changes by changes to the balconies]	Granted

Table 6: Cumulative Schemes

- Black: List as per 2017 EIA/ES for original application (2017/3847/P) – refer to 2017 ES for detail
- Blue: Updates to list of schemes, as per May 2020 S73 (2020/3116/P)
- Green: Updates to list of schemes, as per March 2023 S73 (2022/3646/P)
- Red: Updates to list of cumulative schemes as of November 2023
- Purple: Updates to list of cumulative schemes as of May 2024
- Yellow: Updates to list of cumulative schemes as of December 2024
- Dark Blue: Updates to list of cumulative schemes as of January 2025

No	Application Reference	Site/Description of Proposal	Application/Scheme Status
14	2016/5358/P, (2015/1189/P, 2014/3633/P and 2012/6338/P)	Camden Collection, St Martin's Walk (Bacton Estate), Haverstock Road, Wellesley Road, Vicars Road, London, NW5 4PT	Phase 1 complete, Phase 2 under construction
15	2017/5497/P	2-6 St Pancras Way, NW1 OTB: 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 54,522sqm business floorspace (B1), 73 residential homes (C3) (10xstudio, 29x1 bed, 27x2 bed 7x3 bed), 87 bed hotel (C1), 1,601sqm gym (D2), 5,858sqm flexible retail (A1 - A4) and 6,011sqm storage space (B8) development with associated landscaping work.	Under construction
	2021/1239/P	Variation of condition 2 (approved plans) of planning permission 2017/5497/P for " <i>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 business floorspace (B1), 73 residential homes (C3) (10xstudio, 29x1 bed, 27x2 bed 7x3 bed), hotel (C1), gym (D2), flexible retail (A1 - A4) and storage space (B8) development with associated landscaping work</i> " with amendments to PLOT A ONLY to include alterations to external paving, enlargement of roof terrace, additional secondary entrance, setting back of the north facade, enlargement of plant enclosure, alterations to the fenestration, lowering of the balustrades and increase of the parapet height.	Granted subject to Section 106 Agreement
	2021/2671/P	The Ugly Brown Building 2 St Pancras Way London NW1 0QG: Demolition of existing building, and redevelopment to provide a nine-storey building with two basement levels for flexible Class E and Sui Generis Use, a two-storey Pavilion for flexible Class E and Sui Generis Use, 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.	Granted subject to Section 106 Agreement

Table 6: Cumulative Schemes

- Black: List as per 2017 EIA/ES for original application (2017/3847/P) – refer to 2017 ES for detail
- Blue: Updates to list of schemes, as per May 2020 S73 (2020/3116/P)
- Green: Updates to list of schemes, as per March 2023 S73 (2022/3646/P)
- Red: Updates to list of cumulative schemes as of November 2023
- Purple: Updates to list of cumulative schemes as of May 2024
- Yellow: Updates to list of cumulative schemes as of December 2024
- Dark Blue: Updates to list of cumulative schemes as of January 2025

No	Application Reference	Site/Description of Proposal	Application/Scheme Status
16	2019/4201/P	St Pancras Commercial Centre 63 Pratt Street London NW1 0BY: 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), 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	Under construction
17	2020/5063/P*	The Charlie Ratchford Centre Belmont Street London NW1 8HF: Redevelopment of site including demolition of existing buildings and erection of a building up to 10 storeys in height for to provide self-contained residential flats (Use Class C3) and associated works.	Granted
18	2019/4700/HS2	Construction of the Park Village East retaining wall, portal and high-speed dive unders including the installation of ground anchors; Removal of excavated material from the station approach, tunnel portal and headhouse works; Construction of the decks over the high-speed dive under and railway south of Mornington Street Bridge; Construction of the west and east side retaining wall around Hampstead Road Bridge; Extension of Hampstead Road Bridge as well as associated utilities and highway works; Support the movement of plant and material down into the Euston approach railway cutting; Support the removal of excavated material generated in the railway cutting; Construction of Adelaide Road vent shaft.	Refused by LBC with an Appeal later allowed on 25/07/2020 - construction/completion status unknown
19	2021/0911/P*	Partial demolition and redevelopment of the existing building and upward extension to provide office and commercial floorspace at ground floor (Class E) and six residential homes (3x 2bed and 3x 1bed). Alterations to landscaping and public realm.	Resolution to grant on 16/12/2021, pending Section 106 Agreement sign off

Table 6: Cumulative Schemes

- Black: List as per 2017 EIA/ES for original application (2017/3847/P) – refer to 2017 ES for detail
- Blue: Updates to list of schemes, as per May 2020 S73 (2020/3116/P)
- Green: Updates to list of schemes, as per March 2023 S73 (2022/3646/P)
- Red: Updates to list of cumulative schemes as of November 2023
- Purple: Updates to list of cumulative schemes as of May 2024
- Yellow: Updates to list of cumulative schemes as of December 2024
- Dark Blue: Updates to list of cumulative schemes as of January 2025

No	Application Reference	Site/Description of Proposal	Application/Scheme Status
20	2020/2364/P*	1-3 Ferdinand Place, London NW1 8EE Demolition of the existing building and the erection of a four storey building with roof level accommodation, terraces and PV panels, comprising office use (Class E) at ground floor level and 9 self-contained residential homes (Class C3) on the upper floors, plus associated plant, cycle parking and refuse storage.	Granted subject to a Section 106 Legal Agreement
21	2018/2179/P*	18-22 Haverstock Hill, NW3 2BL Demolition of existing buildings and ancillary structures (11 flats, A1 unit, A5 unit) and construction of a new building comprising ground plus basement and five upper floors for use as 29 no. dwellings (Class C3) and flexible Class A1/A2/A3/A4 together with cycle parking, landscaping, refuse and associated works.	Granted 29/01/2020
22	2022/5508/P	160 Malden Road, NW5 4BT Erection of 4 storey building to provide 15 self-contained flats at ground, first, second and third floor levels and office use at ground floor level, following demolition of existing MOT repair garage and hand car wash.	Refused
	2024/1193/P	160 Malden Road, London, NW5 4BT Erection of 4 storey building to provide 15 self-contained flats at ground, first, second and third floor levels and office use at ground floor level, following demolition of existing MOT repair garage and hand car wash.	Resolution to grant at committee (14/11/2024) subject to Section 106 Agreement
23	2019/3138/P*	115-119 Camden High Street, NW1 7JS Demolition of existing two storey building and erection of a part four/part five storey building (plus enlargement of existing basement and plant room at roof level) comprising retail (Class A1) at ground floor level fronting Camden High Street, 80-bed hotel (Class C1) and 3 x 2-bed residential homes (social rented) (Class C3) fronting Delancey Street.	Granted subject to a Section 106 Legal Agreement (29/12/2020)

Table 6: Cumulative Schemes

- Black: List as per 2017 EIA/ES for original application (2017/3847/P) – refer to 2017 ES for detail
- Blue: Updates to list of schemes, as per May 2020 S73 (2020/3116/P)
- Green: Updates to list of schemes, as per March 2023 S73 (2022/3646/P)
- Red: Updates to list of cumulative schemes as of November 2023
- Purple: Updates to list of cumulative schemes as of May 2024
- Yellow: Updates to list of cumulative schemes as of December 2024
- Dark Blue: Updates to list of cumulative schemes as of January 2025

No	Application Reference	Site/Description of Proposal	Application/Scheme Status
24	2021/4063/P	50A Haverstock Hill, London, NW3 2BH Erection of a part two storey and part four storey rear extension to provide additional living accommodation and convert the existing lawful arrangement of flats (4 x 1-bed and 2 x 3-bed flats) into a new mix of 4 x 1-bed and 4 x studio flats (partially retrospective).	Refused
25	2023/0270/P*	26-28 Rochester Place, London, NW1 9DF Two-storey upwards extension to an existing mixed use (residential and office) building to form 10 additional flats.	Granted prior approval subject to Section 106 Legal Agreement (11/10/2023)
26	2024/1014/P	139-147 Camden Road, Camden, London, NW1 9HJ Erection of 3 storey residential building comprising 5 flats, with ground floor bin and bicycle stores and frontage paving and planting.	Refused (06/06/2024)
27	2023/5113/P	118 Malden Road, London, NW5 4BY Reconstruction of existing building to form a new part four/part two-storey building providing four self-contained residential homes (Class C3), including the creation of new basement floor space.	Pending Consideration
28	2024/1301/P	63 Camden High Street, London, NW17 7JL Conversion of the existing building from commercial use (Class E) to residential use (Class C3) and alteration of the existing roof level and erection of a single storey upwards extension to provide 9 x self-contained residential homes and the retention 2 x commercial units on the ground floor and associated refuse and cycle storage.	Pending Consideration

5. Legislation and Policy

EIA Regulations

The original 2017 EIA/ES was undertaken pursuant to the 2011 EIA Regulations (as amended in 2015), as agreed with the LBC through a formal EIA Scoping process. In respect of the subsequent The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, SI 2017/571 ('the EIA Regulations'), which were published in May 2017, the following is noted:

- Human Health was fully considered in the design of the original June 2018 Consented Scheme through the provisioning of on-site open space, amenity, employment and community space. Furthermore, the socio-economic, air quality, noise and vibration, wind microclimate, daylight and sunlight assessments have had regard to the health of the newly introduced on-site residential population, as well as off-site residential receptors. The February 2025 Amended Proposed Development would not alter any of these considerations.
- Climate change effects, greenhouse gas emissions, and resilience were considered in the design of the June 2018 Consented Scheme in respect of the energy strategy and drainage strategy (and associated flood risk assessment), as well as the potential for overheating, while the Air Quality Assessment had regard to vehicle and heating plant emissions. The March 2023 Consented Scheme included the adoption of ASHPs with supplementary boilers that would reduce NO_x and CO₂ emissions. The February 2025 Amended Proposed Development would not alter any of these considerations. Furthermore, a new Whole Lifecycle Carbon Assessment and Circular Economy Assessment would accompany the February 2025 S73 application.
- The nature of the June 2018 Consented Scheme is such that it is unlikely to result in major accidents and/or disasters. The design of the proposals took account of potential man-made emergencies and accidents, such as fire and surface water flooding. The February 2025 Amended Proposed Development would not alter any of these considerations, while seeking to improve performance against Fire Regulations and the latest Building Regulations adopted in October 2024².

Accordingly, this letter, when read together with the 2011 EIA Regulations (as amended in 2015) satisfies the environmental considerations of both the 2011 EIA Regulations (as amended in 2015) and the current EIA Regulations (as amended in 2017).

National Legislation and Policy

In respect of policy and guidance at a national level, the following is noted:

- In December 2024, the Government published an updated version of the National Planning Policy Framework (NPPF)³;
- In respect of the PPG, regular updates have been made in respect to Environmental Impact Assessment and environmental topic specific guidance; and
- In January 2021 an update was made to the National Design Guide to make sure that developments are beautiful, enduring and successful.

Regional Policy

At a regional level, the following is noted:

- An updated version of The London Plan was adopted by the Greater London Authority (GLA) in March 2021;
- In respect of London Plan Guidance documents (LPGs), the following documents have been adopted:
 - Be seen Energy Monitoring LPG (adopted in September 2021);

² Ministry of Housing, Communities and Local Government, 2024. The Building (Amendment) (England) Regulations. London. HMSO

³ Ministry of Housing, Communities and Local Government, 2024. National Planning Policy Framework. London. HMSO.

- Circular Economy Statements LPG (adopted in March 2022);
- Whole Life Carbon LPG (adopted in March 2022);
- Sustainable Transport, Walking and Cycling LPG (adopted in November 2022);
- Air Quality Positive LPG (adopted in February 2023);
- Air Quality Neutral LPG (adopted in February 2023); and
- Digital Connectivity Infrastructure (adopted in October 2024).
- There is an updated Affordable Housing LPG which is currently at draft consultation stage.
- The Greater London Authority have also produced a new Planning Practice Note: Heritage Impact Assessments and the Setting of Heritage Assets (November 2023).

Local Policy

At a local level, there have been no relevant changes to the LBC Development Plan since the 2017 EIA/ES (as amended), including the 'Camden Local Plan', which was adopted in June 2017. However, the following supplementary planning documents ('Camden Planning Guidance') have been adopted:

- Air Quality (adopted in January 2021);
- Amenity (adopted in January 2021);
- Basements (adopted in January 2021);
- Design (adopted in January 2021);
- Employment Site and Business Premise (adopted in January 2021);
- Energy Efficiency and Adaptation (adopted in January 2021);
- Planning for Health and Wellbeing (adopted in January 2021);
- Town Centres and Retail (adopted in January 2021); and
- Transport (adopted in January 2021).

LBC has begun preparing a Site Allocations Review (2020), which is currently at draft stage, having been consulted on at the beginning of 2020 and the end of 2021.

LBC is also preparing a draft new Camden Local Plan, which sets out the vision for future development in Camden for the next 15 years. LBC consulted on the draft new Local Plan from 17 January to 13 March 2024.

6. Summary of Environmental Considerations

Table 7 presents the outcomes of the updated EIA of the February 2025 Amended Proposed Development.

Amended Proposed Development Effects

In respect of the topics previously scoped out of the 2017 EIA/ES (as amended) - Ground Conditions, Ecology, Flood Risk and Archaeology - no further assessments have been undertaken, as the February 2025 Amended Proposed Development does not alter the basis of these assessments. Accordingly, the conclusions of the updated EIA, previously reported in the 2017 EIA/ES (as amended), remain valid.

In respect of topics previously scoped into the 2017 EIA/ES (as amended), the updated EIA presented in Table 7 confirms non-material changes are anticipated to the conclusions of the 2017 EIA/ES (as amended), with respect to socio-economics; transport and accessibility; air quality; noise and vibration; daylight, sunlight, overshadowing and solar glare; wind microclimate; townscape and visual; and built heritage.

Supplemental technical reports have been prepared in respect of transport and accessibility; air quality; noise and vibration; daylight, sunlight, overshadowing and solar glare; wind microclimate; townscape and visual; and built heritage. These reports are provided in **Appendices 1-8**.

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
<i>ES Chapter 6: Socio-Economics</i>			
<p>Since the August 2022 EIL, no new policy or guidance has been published that directly impacts on the assessment of socio-economics.</p> <p>The assessment scope and methodology therefore remain unchanged from that set out in the August 2022 EIL.</p> <p>The February 2025 Amended Proposed Development does not introduce any new issues for consideration in the updated socio-economic assessment.</p>	<p>The latest available data on education provision in Primary School Planning Area (SPA) 3 and borough-wide for secondary⁴, indicates current capacity of 262 primary school places and 1,133 secondary school places. LBC forecasts⁵ the ongoing surplus of education places. In this respect, for primary SPA 3, spare capacity is forecast to grow to 634 surplus places by 2033/34, whilst the borough’s secondary schools are anticipated to have 2,135 surplus places by 2033/34.</p> <p>There remains capacity across healthcare provision (GPs, hospitals, pharmacies and dentists) local to the application site. There is an average of approximately 1,700 patients per Full Time Equivalent (FTE) GP within 1.6 km of the application site⁶, which, whilst higher than the Camden-wide average (1,470), this remains lower than the guideline of 1 FTE GP per 1,800 patients as advised by the Royal College of</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <p>Support construction employment:</p> <ul style="list-style-type: none"> • Negligible (neighbourhood level) • Minor Beneficial (local and wider levels) <p>Support construction apprenticeships:</p> <ul style="list-style-type: none"> • Major Beneficial (local level) • Minor Beneficial (wider level) <p>Generate construction productivity:</p> <ul style="list-style-type: none"> • Minor Beneficial (local and wider levels) <p>Generate expenditure:</p> <ul style="list-style-type: none"> • Minor Beneficial (neighbourhood level) • Negligible Beneficial (local and wider levels) <p><u>Completed Development</u></p> <p>Increase employment opportunities:</p> <ul style="list-style-type: none"> • Minor Beneficial (neighbourhood and local levels) • Negligible (wider level) <p>Enhance local labour provision and skills:</p> <ul style="list-style-type: none"> • Major Beneficial (neighbourhood level) • Moderate Beneficial (local level) • Negligible (wider level) 	<p>Updated Residual Effects</p> <p><u>Demolition and Construction</u></p> <p>Updated modelling based on the February 2025 Amended Proposed Development’s construction costs (provided by the Applicant) and the 2024 average turnover per worker in the London construction sector, indicates that there would be an average of approximately 125 gross direct FTE construction jobs supported annually, which is a marginally lower than the previously reported 130 FTE jobs, albeit due to the demolition and construction stage programme having been extended.</p> <p>Whilst economic impact modelling inputs, such as the increased construction costs, have increased since the 2017 EIA/ES and most recent August 2022 EIL, it is considered that the nature of the proposed amendments in the context of the February 2025 Amended Proposed Development as a whole would not materially affect the overall scale or nature of demolition and construction works.</p> <p>In terms of other effects for the duration of the demolition and construction stage, there would be a Gross Value Added (GVA) equivalent total of £171 million contributed to the Greater London economy, increasing from £117 million GVA as assessed in the 2017 EIA/ES. The increase reflects the extended</p>

⁴ Department for Education (2025) 'Get Information About Schools' [Online]: Accessed 5th February 2025. Available at: <https://www.get-information-schools.service.gov.uk/>

⁵ LB Camden Council (2024) School Place Planning Report: Appendix B: Primary Forecast

⁶ NHS Digital (2025) General Practice Workforce: December 2024

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
	<p>GPs⁷. Based on this ratio, GP surgeries within 1.6 km of the application site would have available capacity to accommodate approximately 4,480 additional patients.</p> <p>There are a range of pharmacies, opticians and hospitals within proximity to the application site. The four dental surgeries identified as those closest to the application site⁸ are registered as accepting new patients at NHS rates⁹, indicating capacity for this type of provision.</p> <p>The open/play space baseline is unchanged in terms of the LBC's evidence base from the 2017 EIA/ES (as amended).</p>	<p>Increase local business space and support business activity:</p> <ul style="list-style-type: none"> • Minor Beneficial (local level) <p>Provide new housing, including affordable:</p> <ul style="list-style-type: none"> • Minor Beneficial (local level) <p>Generate income and expenditure:</p> <ul style="list-style-type: none"> • Major Beneficial (neighbourhood level) • Moderate Beneficial (local level) • Negligible Beneficial (wider level) <p>Generate Council Tax revenue</p> <ul style="list-style-type: none"> • Moderate Beneficial (local level) <p>Generate New Homes Bonus payments</p> <ul style="list-style-type: none"> • Major Beneficial (local level) <p>Generate business rate revenue</p> <ul style="list-style-type: none"> • Moderate Beneficial (local level) <p>Increase demand for primary education facilities</p> <ul style="list-style-type: none"> • Negligible (neighbourhood level) <p>Increase demand for secondary education facilities</p> <ul style="list-style-type: none"> • Negligible (neighbourhood level) <p>Increase demand for health facilities</p> <ul style="list-style-type: none"> • Negligible (neighbourhood level) <p>Increase demand for open space and recreation facilities</p> <ul style="list-style-type: none"> • Minor Beneficial (neighbourhood level) 	<p>duration of the demolition and construction stage programme.</p> <p>Notwithstanding these updates to quantified modelled impacts, scale of effect in respect of the labour force requirements, and linked demolition and construction stage effects, in relation to employment, apprenticeships and productivity are considered to remain unchanged from the 2017 EIA/ES.</p> <p>While there would be a numerical increase in the impacts (employment opportunities and productivity), the scale of predicted demolition and construction stage effects would remain minor beneficial, and the conclusions of the 2017 EIA/ES (as amended) would therefore remain valid.</p> <p><u>Completed Development</u></p> <p>While not subject of the February 2025 S73 Application, it is noted that the NMAs consented post August 2022 EIL introduced small changes in employment floorspace (see Table 4).</p> <p>Overall changes to non-residential floorspace quantum, as a result of the proposed amendments, are considered to be small, and therefore effects related to employment opportunities; local labour provision and skills; local business space and business activity; and business rates would remain unchanged from the 2017 ES (as amended).</p> <p>There would be a small reduction in the number of homes as a result of the proposed amendments (from 644 to 637). This includes a reduction of affordable housing from 38 % to 15 % by habitable room (from</p>

⁷ NHS Healthy Urban Development Unit (2009) HUDU Planning Contribution Model: Guidance Notes

⁸ Parkway Dental Care; Ivy House Dental Practice; Albany Dental Practice; and Michael Wieder's Dental Surgery

⁹ NHS Digital (2025) 'Find a Dentist' [Online]: Accessed 5th February 2025. Available at: <https://www.nhs.uk/service-search/find-a-dentist/>

Table 7: Environmental Implications of February 2025 Amended Proposed Development			
Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
		<p>Increase demand for children’s play space:</p> <ul style="list-style-type: none"> • Minor Beneficial (neighbourhood level) <p>Reduced crime levels through increased local activity:</p> <ul style="list-style-type: none"> • Minor Beneficial (neighbourhood level) <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> • Employment: Major Beneficial • Productivity: Moderate Beneficial <p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> • Employment: Major Beneficial • Productivity: Moderate Beneficial • Population, Labour Force and Skills: Major Beneficial • Business Space and Activity: Moderate Beneficial • Housing: Moderate Beneficial • Income and Expenditure: Major Beneficial • Local Authority Revenue: Major Beneficial • Public Services: Negligible to Minor Adverse 	<p>203 to 83 homes). The reduction in provision of affordable housing is likely to deliver slightly reduced beneficial outcomes than that which would be supported by the extant planning permission. However, notwithstanding this, it is clear that the February 2025 Amended Proposed Development’s provision of high-quality, health-promoting new market homes in a sustainable location – a proportion of which would be affordable – should continue to be considered as having an overall beneficial effect. As such, the conclusions of the 2017 EIA/ES (as amended) remain valid with regard to the provision of new housing. It is noted that the EIA does not consider compliance in respect of affordable housing provisioning targets.</p> <p>The small change in the overall number of homes means that effects in respect of housing demand; council tax revenue; and New Homes Bonus revenue would remain unchanged from the 2017 EIA/ES (as amended) assessment conclusions.</p> <p>The change in housing mix, when applied to the GLA Population Yield Calculator¹⁰, results in a reduction to the estimated residential population (from 1,328 in the 2017 EIA/ES (as amended) to 1,233 in the February 2025 Amended Proposed Development). The change in housing mix also results in a reduction in the number of children anticipated to live on-site, from 243 to 140¹¹. However, it is considered that the scale of change (approximately a 7% reduction in the overall population) does not change the conclusions of the 2017 EIA/ES (as amended) with respect to effects</p>

¹⁰ Greater London Authority (2019) ‘GLA Population Yield Calculator’ [Online]: Accessed 5th February 2025. Available at: <https://www.data.gov.uk/dataset/1dc6f6ae-aa9d-46ee-95e7-486b0579c7f2/gla-population-yield-calculator>

¹¹ LB Camden Council (2010) Camden Survey of New Housing 2002-08

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
			<p>such as resident income and expenditure; demand for health facilities; demand for primary and secondary education; demand for open space and recreation facilities; and demand children’s play space, which therefore remain valid.</p> <p>In respect of crime, the 2017 EIA/ES (as amended) assessment conclusion of Minor Beneficial remains unchanged given there are no changes to the February 2025 Amended Proposed Development which are perceived to impact on crime differently.</p> <p>Updated Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <p>The conclusions of the 2017 EIA/ES (as amended) remain unchanged in respect of cumulative demolition and construction socio-economic effects. This is due to the negligible change to the baseline conditions and negligible changes to the cumulative schemes, in comparison to that previously assessed in the 2017 EIA/ES (as amended).</p> <p><u>Completed Development</u></p> <p>The conclusions of the 2017 EIA/ES (as amended) remain unchanged in respect of cumulative completed development socio-economic effects. This would be due to the negligible change to the baseline conditions and negligible changes to the cumulative impacts, in comparison to that previously assessed in the 2017 EIA/ES (as amended).</p>

ES Chapter 7: Transport and Accessibility

<p>Revisions to the NPPF have been made since the August 2022 EIL. (most recently published in December 2024) and include some changes to</p>	<p>The traffic and pedestrian surveys for the 2017 EIA/ES (as amended) were undertaken in May 2016. It is noted that these surveys were undertaken beyond the typical</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> • Severance: Minor Adverse • Driver Delay: Negligible 	<p>Updated Residual Effects</p> <p>It is noted that following completion of the assessment in Appendix 1, the year of completion was updated to 2033. It is confirmed that the conclusions of the</p>
---	---	--	--

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
<p>transport policies. However, the changes are largely focused on ensuring that developments prioritise non-motorised traffic. It is considered that the February 2025 Amended Proposed Development does this, with an increase in cycle parking provision in comparison to the current consented uses. In light of the above, the new NPPF does not affect the assessment methodology for the updated EIA.</p> <p>The Institute of Environmental Management and Assessment (IEMA) Guidance were updated in July 2023 within the document 'Environmental Assessment of Traffic and Movement'. This updated guidance still utilises much of the previous 1993 IEAMA Guidance.</p> <p>The new IEAM Guidance does not affect the scope or methodology of the transport and accessibility assessment.</p> <p>The proposed amendments and the February 2025 Amended Proposed Development as a whole does not introduce any new issues for consideration in the updated transport and accessibility assessment.</p>	<p>three-year validity period; however, there are several points to acknowledge in considering the validity of the surveys.</p> <p>Firstly, for the May 2020 Consented Scheme it was agreed with the LBC and TfL that no growth should be applied to baseline traffic as it was considered unlikely that traffic growth would occur within the study area.</p> <p>Secondly, there have been no significant changes to the surrounding roads (e.g. Juniper Crescent) (i.e. no new development or infrastructure, or changes to the Morrisons supermarket) that would impact the level of traffic that travels along access roads in the baseline scenario. Therefore, it is considered that the previous surveys used to derive baseline flows remain valid for the updated assessment.</p> <p>The existing baseline data (e.g. for pedestrian infrastructure, public transport, cycling infrastructure and accidents trends) at the application site and within the surrounding study area, was included within the previous transport documents prepared by the Transport Consultants for the original 2017 full application (2017/3847/P), in particular the Transport</p>	<ul style="list-style-type: none"> • Pedestrian Delay: Negligible • Fear and Intimidation: Negligible • Pedestrian Amenity: Negligible • Accidents and Safety: Negligible • Driver Stress: Minor Adverse • Highway Capacity: Negligible • Public Transport Capacity: Negligible <p><u>Completed Development</u></p> <ul style="list-style-type: none"> • Severance: Minor Adverse • Driver Delay: Minor Adverse • Pedestrian Delay: Minor Adverse • Fear and Intimidation: Minor Adverse • Pedestrian Amenity: Negligible • Accidents and Safety: Negligible • Driver Stress: Negligible • Highway Capacity: Negligible • Public Transport Capacity: Minor Adverse <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> • Severance: Minor Adverse • Fear and Intimidation: No cumulative effects <p><u>Completed Development</u></p> <ul style="list-style-type: none"> • Severance: Minor Adverse • Fear and Intimidation: No cumulative effects • Accidents and Safety: Negligible 	<p>assessment remain valid, although representing a more conservative assessment.</p> <p>Appendix 1 presents a traffic and accessibility technical note, providing supporting evidence to the conclusions reached below.</p> <p><u>Demolition and Construction</u></p> <p>As the proposed amendments and the February 2025 Amended Proposed Development as a whole would not materially change the construction methodology and scale of the MS Parcel development, any change in construction HGV movements would likely be <i>de minimis</i>. This also applies to the updated construction programme for the February 2025 Amended Proposed Development (see Table 5), whereby alterations to the programme, sequencing and overlap would not increase the worst-case 180 daily HGV movements (360 two-way movements) estimated at peak level for the 2017 EIA/ES (as amended). Therefore, the proposed amendments would not affect the overall scale or nature of demolition and construction effects on the highway network, road users, accidents and safety, public transport network, pedestrians and cyclists. Accordingly, the conclusions of the 2017 EIA/ES (as amended) would remain valid.</p> <p><u>Completed Development</u></p> <p>In respect of the future baseline, the February 2025 Amended Proposed Development is now targeted for completion in 2031 (not 2028). The amended future baseline does not alter the basis for/robustness of the scenario assessments as additional background growth in the future years is not anticipated.</p> <p>The technical note presented in Appendix 1 confirms the traffic generation associated with the MS Parcel. Based on these flows, the proposed amendments and</p>

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
	<p>Assessment¹². Given that the existing conditions have not changed materially since the time of the original Transport Assessment, and the subsequent S73 applications, it is considered unnecessary to re-provide this level of detail. The historical data is therefore considered to remain valid as a basis for assessment.</p>		<p>February 2025 Amended Proposed Development as a whole would change the level of operational traffic generated on the local highway network. Taking into account the reduction of seven overall homes, it has been calculated that the February 2025 Amended Proposed Development would result in the following net changes in vehicle trip generation in peak hours and daily at the February 2025 Amended Proposed Development. These flows are the net change from the 2017 EIA/ES (as amended) to the completed development scenario on Juniper Crescent:</p> <ul style="list-style-type: none"> • AM Peak: -1 two-way vehicle movements • PM Peak: no change • Daily: -1 two-way vehicle movements <p>Furthermore, it has been calculated that the February 2025 Amended Proposed Development would result in the following net change in HGV trip generation in peak hours and daily:</p> <ul style="list-style-type: none"> • AM Peak: no change • PM Peak: no change • Daily: no change <p>The above calculations show either a slight reduction or no change in traffic on Juniper Crescent resulting from the February 2025 Amended Proposed Development. Given the reduction in overall flows, and no change in HGV movements, it is considered that these traffic flows changes would not materially affect the conclusions of the residual effects as reported in the 2017 EIA/ES (as amended).</p> <p>As for the net traffic change on Chalk Farm Road and Ferdinand Street, it is considered that the overall</p>

¹² Ardent Consulting Engineers, 2017. Proposed Residential / Retail Development: Morrisons, Chalk Farm Road, Camden – Transport Assessment (Report Ref. 160630-06A). Available at: <https://camdocs.camden.gov.uk/CMWebDrawer/Record/6695122/file/document?inline>

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
			<p>changes from the 2017 EIA/ES (as amended) would be negligible, as overall traffic changes as highlighted above are either reductions or no change.</p> <p>Based on the above, the effects reported in the 2017 EIA/ES (as amended) would remain unchanged and no additional mitigation would be required.</p> <p>Accordingly, no new or amended significant transport and accessibility effects are likely to arise in respect of the February 2025 Amended Proposed Development.</p> <p>Based on the updated person trip generation calculations in Appendix 1, and noting the reduction in the overall number of homes, the February 2025 Amended Proposed Development would result in decreases in peak hour/daily trips by walking, cycling and public transport.</p> <p>It is considered that the previous conclusions of the 2017 EIA/ES (as amended) regarding pedestrian delay/amenity and accidents/safety would remain unchanged (negligible), based on the quality of the existing routes and the small decrease in hourly trips.</p> <p>As for public transport capacity, the 2017 EIA/ES (as amended) for the December 2020 Consented Scheme included a qualitative review of the peak hour increases based on the average increase in passengers per service. Based on the decrease in public transport trips and that no specific capacity issues have been identified and no specific issues are known, it is considered that the effects on public transport capacity would remain Minor Adverse and therefore unchanged from the conclusions of the 2017 EIA/ES (as amended).</p> <p>It is concluded that additional mitigation would not be required.</p>

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
			<p>Accordingly, no new or amended significant transport and accessibility effects are likely to arise for the February 2025 Amended Proposed Development.</p> <p>Updated Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <p>In respect of cumulative effects, the previously reported inter-project effects within the 2017 EIA/ES (as amended) would remain valid, due to the non-material nature of updates in the list of cumulative schemes. A review of the application documents for the additional schemes highlighted in Table 6 confirms that the construction routes for these schemes are outside of the study area for the 2017 EIA/ES (as amended), or that anticipated daily construction flows are negligible, and so these schemes would not result in a material change to the conclusions of the 2017 EIA/ES (as amended) in respect of cumulative demolition and construction effects.</p> <p>A number of the historical cumulative schemes have either been completed, refused or subsequently have lapsed by other means. Accordingly, the assessment presents a worst-case.</p> <p><u>Completed Development</u></p> <p>In respect of cumulative completed development effects, as per the 2017 EIA/ES (as amended), no traffic flows for the cumulative schemes in Table 6 have been taken into account in the cumulative scenario, as schemes within the study area would be materially car-free and/or the study areas for assessment do not overlap (i.e. any cumulative schemes where traffic changes were quantified did not specifically increase on Chalk Farm Road/Ferdinand Street/Juniper Crescent in the study area for the application site).</p>

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
			<p>For robustness, the 2017 EIA/ES (as amended) includes an assessment of cumulative completed development effects and confirmed no change in the reported effects. The February 2025 Amended Proposed Development would have no effect on these previous conclusions of the 2017 EIA/ES (as amended).</p> <p>Furthermore, no new or amended significant transport and accessibility effects have been reported for the February 2025 Amended Proposed Development. Therefore, the inter-cumulative effects of the 2017 EIA/ES (as amended) remain valid in respect of transport and accessibility effects.</p>

ES Chapter 8: Air Quality

<p>Since the August 2022 EIL, the following new policy and guidance have been published:</p> <ul style="list-style-type: none"> The NPPF, December 2024; however, there are no material changes in terms of air quality that influence scope or methodology of the updated EIA. IAQM Guidance on the Assessment of Dust from Demolition and Construction, January 2024. The amended guidance would not result in any significant change to the scope or methodology of the construction impact assessment undertaken for the 2017 EIA/ES (as 	<p>Existing air quality in the study area of the application site meets the relevant UK Air Quality Objectives (AQOs) for NO₂, PM₁₀ and PM_{2.5}.</p> <p>Local monitoring carried out by LBC along Chalk Farm Road shows NO₂ concentrations during 2023 were below the annual mean and 1-hour AQOs for this pollutant.</p> <p>Further monitoring of PM₁₀ and PM_{2.5}, carried out by LBC also shows that concentrations of these two pollutants met the annual mean and 24-hour AQOs during 2023 at roadside locations within the borough.</p> <p>In respect of the future baseline, with the February 2025 Amended Proposed Development now targeted</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <p>The assessment presented in the 2017 EIA/ES (as amended) concluded that a high risk of dust impacts could occur in the absence of appropriate mitigation. The ES chapter recommended that best practice measures to be set out within a Construction Management Plan (CMP), resulting in a temporary slight adverse residual impact, which would not be significant in EIA terms.</p> <p>The impact of construction traffic was concluded as unlikely to be significant, due to the inconsistent nature of construction traffic and its short-term impact.</p> <p><u>Completed Development</u></p> <p>The air quality assessment presented in the 2017 EIA/ES (as amended) concluded that a negligible residual impact could occur, in</p>	<p>Updated Residual Effects</p> <p>Appendices 2 and 3 present the Air Quality Addendum Report and Air Quality Positive Statement which provide supporting evidence for the conclusions reached below.</p> <p>It is noted that following completion of the assessment in Appendix 2, the year of completion was updated to 2033. It is confirmed that the conclusions of the assessment remain valid, although representing a more conservative assessment.</p> <p><u>Demolition and Construction</u></p> <p>There remains a high risk of dust impacts in the absence of appropriate mitigation. The best practice measures recommended in the 2017 EIA/ES (as amended) remain valid and, following implementation of these measures, residual impacts would become temporary slight adverse and therefore not significant.</p> <p>In respect of the amended demolition and construction programme, the worst-case HGVs have been</p>
--	--	---	--

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
<p>amended) and therefore no updated assessment is required. Any mitigation recommended within the 2017 EIA/ES (as amended) for the control of emissions during construction remains valid.</p> <ul style="list-style-type: none"> GLA London Plan Air Quality Neutral Guidance, 2023. The February 2025 Amended Proposed Development has been assessed in accordance with this guidance. GLA London Plan Air Quality Positive Guidance, 2023. An Air Quality Positive Statement has been produced for the February 2025 Amended Proposed Development in accordance with this guidance. 	<p>for completion in 2031 (not 2028), Defra predictions indicate that air quality will improve in 2029, 2030 and 2031. Accordingly, the assessment undertaken against the 2028 future baseline represents a worst-case in air quality terms.</p>	<p>terms of operational traffic emissions, on-site emissions, associated with the proposed Combined Heat and Power (CHP) plant, and site suitability (exposure) of application site occupants.</p> <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <p>Best practice measures were recommended to minimise emissions during the construction phase and cumulative impacts were concluded as being not significant.</p> <p><u>Completed Development</u></p> <p>Cumulative impacts were concluded to be negligible (not significant) in respect of traffic related emissions associated with the operational development, in conjunction with other committed development.</p>	<p>confirmed by the Applicant as unchanged from that which were assessed in the 2020 EIL. Furthermore, no new or amended sources of air quality emissions have been identified within the new programme.</p> <p><u>Completed Development</u></p> <p>An updated assessment of operational traffic effects has not been carried out.</p> <p>The February 2025 Amended Proposed Development would not result in a significant change in traffic movements over those assessed within the 2017 EIA/ES (as amended) and therefore the conclusions of the 2017 EIA/ES (as amended) air quality assessment remain valid, with operational traffic impacts being concluded as negligible (not significant).</p> <p>In respect of the future baseline, the February 2025 Amended Proposed Development is now targeted for completion in 2033 (not 2028). The amended future baseline does not alter the basis for/robustness of the scenario assessments as additional background growth in the future years is not anticipated.</p> <p>The updated baseline assessment has shown a downward trend in local pollution concentrations in the areas surrounding the application site. The 2017 EIA/ES (as amended) therefore represents a worst-case prediction of NO₂, PM₁₀ and PM_{2.5} concentrations at the application site. The residual impacts of the February 2025 Amended Proposed Development, in terms of site suitability (exposure), remain negligible (not significant).</p> <p>The energy strategy for the February 2025 Proposed Amended Development is for an all-electric scheme using Air Source Heat Pumps (ASHP) and solar PV. This removes the proposed CHP from the application site and any associated on-site emissions associated</p>

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
			<p>with the combustion processes. The impact of on-site emissions would therefore be negligible and the outcome of the 2017 EIA/ES (as amended) remains valid.</p> <p>An Air Quality Neutral Assessment has been carried out for the February 2025 Amended Proposed Development against the 2023 GLA Guidance which concludes that the proposals are better than air quality neutral in terms of both building and transport emissions.</p> <p>The February 2025 Amended Proposed Development has been assessed in accordance with the GLA air quality positive guidance and shown to be Air Quality Positive in its approach.</p> <p>Updated Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <p>The development would implement best practice mitigation measures during the demolition and construction stage, in accordance with the IAQM guidance and the Mayor of London’s Supplementary Planning Guidance (SPG), resulting in impacts being not significant. Other developments located within the areas surrounding the application site, which are under construction at the same time, would also be required to implement appropriate best practice measures ensuring emissions are minimised at source. These measures are considered sufficient to ensure cumulative effects are not significant.</p> <p><u>Completed Development</u></p> <p>The operational development would not generate any additional traffic movements than previously assessed and therefore no additional assessment of operational traffic emissions has been carried out. Cumulative</p>

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
			effects are considered to remain as not significant, as set out in the 2017 EIA/ES (as amended).
<i>ES Chapter 9: Noise and Vibration</i>			
<p>Since the August 2022 EIL, the following new policy has been published:</p> <ul style="list-style-type: none"> NPPF, December 2024. <p>However, the changes do not affect the scope and assessment methodology of the noise and vibration assessment.</p> <p>The proposed amendments and the February 2025 Amended Proposed Development, as a whole, do not introduce any new issues for consideration in the updated assessment.</p>	<p>There have been no significant developments in the study area that would introduce fixed noise sources or new receptors for consideration within the updated assessment of the February 2025 Amended Proposed Development.</p> <p>The transport consultants have confirmed that there is no anticipated growth in the traffic volumes of the study area. In addition, the traffic flow data assessed within the 2017 EIA/ES (as amended) remains valid for the February 2025 Amended Proposed Development.</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Generation of demolition and construction plant noise: Minor Adverse and Negligible Generation of demolition and construction traffic noise: Negligible Generation of demolition and construction vibration: Minor Adverse <p><u>Completed Development</u></p> <ul style="list-style-type: none"> Effect of existing noise environment on internal residential noise levels: Negligible Effect of existing noise environment on proposed external amenity spaces: Negligible to Moderate Adverse Change in road traffic noise levels: Negligible Generation of plant noise: Negligible Generation of commercial noise: Minor Adverse Effect of existing vibration levels on proposed development: Negligible to Minor Adverse <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Noise from demolition and construction works (nearby sensitive receptors): Minor Adverse 	<p>Updated Residual Effects</p> <p>Appendix 4 presents the Noise and Vibration Addendum and provides supporting evidence to the conclusions reached below.</p> <p><u>Demolition and Construction</u></p> <p>As the proposed amendments, and the February 2025 Amended Proposed Development as a whole, would not materially change the construction methodology and scale of the proposed development, any change in construction vehicle movements would likely be <i>de minimis</i>.</p> <p>In respect of the amended demolition and construction programme, the worst-case HGVs have been confirmed by the Applicant as unchanged from that which were assessed in the 2020 EIL. Furthermore, no new or amended sources of air quality emissions have been identified within the new programme.</p> <p>The updated sequencing does not alter the assessment of demolition and construction activity noise.</p> <p>Therefore, any change in noise generated by demolition and construction vehicles movements or activities would not be significant. As a result, the overall scale or nature of previously reported demolition and construction effects at noise sensitive receptors would not be affected. Accordingly, the conclusions of the 2017 EIA/ES (as amended) remain valid.</p> <p><u>Completed Development</u></p> <p>In respect of the future baseline, the February 2025 Amended Proposed Development is now targeted for</p>

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
		<ul style="list-style-type: none"> • Noise from demolition and construction works (all nearby noise sensitive receptors): Negligible Adverse • Vibration from demolition and construction works (on- and off-site receptors): Moderate Adverse • Demolition and construction traffic noise: Negligible • Demolition and construction vibration: Minor Adverse <p><u>Completed Development</u></p> <ul style="list-style-type: none"> • Noise on internal residential spaces: Negligible • Noise on shared amenity spaces: Negligible to Minor Adverse • Noise on private balconies: Moderate Adverse • Building plant services noise: Negligible • Commercial noise breakout: Negligible • Road traffic: Negligible • Vibration levels on the proposed development: Negligible to Minor Adverse 	<p>completion in 2033 (not 2028). The amended future baseline does not alter the basis for/robustness of the scenario assessments, as additional background growth in the future years is not anticipated.</p> <p>The recommendations in the 2017 EIA/ES (as amended) in relation to mechanical plant noise are based on the baseline environment which is unchanged and remains valid. Plant noise limits in the 2017 EIA/ES (as amended) were derived in accordance with LBC policy, and the technical approach remains the same. Therefore, the noise limits and recommendations remain valid for the February 2025 Amended Proposed Development. There are no changes to the proposed commercial elements of the February 2025 Amended Proposed Development and therefore the conclusions of the 2017 EIA/ES (as amended) in relation to the generation of commercial noise remain unchanged.</p> <p>The proposed amendments would lead to a reduction in the number of homes at the Development. Therefore, traffic flows associated with the occupied Development would not increase when compared to the August 2022 EIL. Accordingly, there would be no changes to the conclusions of the 2017 EIA/ES (as amended) in relation to traffic flows associated with the occupied development.</p> <p>Updated Cumulative Effects</p> <p>In respect of cumulative effects, the previously reported inter-project effects within the 2017 EIA/ES (as amended) would remain valid, due to the non-material nature of the updates to the list of cumulative schemes.</p> <p>The Transport Consultants have confirmed that there would be no material cumulative change to either</p>

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
			<p>demolition and construction or completed development traffic levels when compared with the conclusions of the 2017 EIA/ES (as amended).</p> <p>In respect of the lapsed cumulative schemes, there would be no amendment to the assessment previously reported. There is no material change to the assessment of the impact of noise in relation to the demolition and construction or completed development stages of the February 2025 Amended Proposed Development.</p> <p>The receptors identified in the assessments of demolition and construction or completed development stages of the February 2025 Amended Proposed Development do not include these lapsed cumulative schemes as they are not the nearest receptors which would require assessment.</p>

ES Chapter 10: Daylight, Sunlight, Overshadowing and Solar Glare

<p>Since the August 2022 EIL, the following new policy and guidance have been published:</p> <ul style="list-style-type: none"> The NPPF was updated in December 2024, with changes highlighting the Government’s recognition that increased flexibility is required on daylight and sunlight in response to the requirement for higher density development. By stating that “<i>when considering applications for housing, authorities should take a flexible approach in applying policies or guidance</i>” 	<p>The built form conditions on-site have changed since the August 2022 EIL, since all previous structures have been demolished at the application site and the construction of Blocks A and B has already commenced. The effects of these alterations are short-term and temporary, and are assessed qualitatively in the Demolition and Construction Phase of the 2017 EIA/ES (as amended).</p> <p>From review of the surrounding context, 44-44a Gloucester Avenue which was previously a cumulative scheme, is now built out and so is considered part of the baseline</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <p>The magnitude of impacts, and resultant likely effects, in relation to daylight, sunlight, overshadowing and solar glare, would vary throughout the demolition and construction stage, depending on the levels of obstruction caused. The impacts would almost certainly be less than that of the completed proposed development, given that the extent of permanent massing would increase throughout the construction stage, until the buildings are completed.</p> <p><u>Completed Development</u></p> <ul style="list-style-type: none"> Change in Daylight levels: 	<p>Updated Residual Effects</p> <p>Overall, there would be no changes in residual effects in relation to daylight, sunlight, overshadowing, solar glare and light pollution, as described below.</p> <p>This is supported by technical assessments where necessary, which are presented in Appendix 5 as follows:</p> <ul style="list-style-type: none"> Appendix 5.1 – Drawings Appendix 5.2 – Daylight and Sunlight Results Appendix 5.3 – Solar Glare Results Appendix 5.4 – Internal Daylight, Sunlight and Overshadowing Report <p><u>Demolition and Construction</u></p> <p>The proposed small increase to the footprint of Block E1; the minor reduction in the heights of Blocks C, D,</p>
--	--	---	--

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
<p><i>relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)."</i></p> <ul style="list-style-type: none"> • Planning Practice Guidance (PPG) (February 2024) outlines that all developments should "maintain acceptable living standards" and that assessing appropriate daylight and sunlight amenity "will depend to some extent on context". • Housing Design Standards LPG (June 2023) recognises that consideration of daylight and sunlight impacts involves a two-stage approach; "Firstly, by applying the BRE guidance; and secondly, by considering the location and wider context when assessing any impacts." Paragraph A1.8 states that "particular consideration should be given to the impact of new development on the level of daylight and sunlight received by the 	<p>condition. However, given the distance from the proposed amendments, this scheme is not a relevant consideration.</p> <p>For the purpose of this EIL, the baseline has been considered the same as that of the 2017 EIA/ES (as amended), in order to provide comparable numerical results and classification of effects.</p>	<ul style="list-style-type: none"> - Negligible to Minor Adverse to 12 properties; - Minor to Moderate Adverse to seven properties; - Moderate Adverse to one property; and - Moderate to Major Adverse to two properties. • Changes in Sunlight levels: <ul style="list-style-type: none"> - Negligible to Minor Adverse • Change in Overshadowing levels: <ul style="list-style-type: none"> - Minor Adverse • Creation of Solar Glare (Train Drivers): <ul style="list-style-type: none"> - Negligible to Minor Adverse • Creation of Solar Glare (Road Users): <ul style="list-style-type: none"> - Negligible to Minor Adverse • No Light Pollution effects (not relevant for assessment). <p>Summary of Cumulative Effects</p> <p>The 2017 EIA/EIL (as amended) concludes that there would be no cumulative effects.</p> <p>No new schemes have come forward in proximity enough to generate cumulative effects in respect of daylight, sunlight, overshadowing, solar glare and light pollution.</p>	<p>E1, E2 and F; and the addition of projecting balconies to one elevation of Block C, would not alter the qualitative assessment of daylight, sunlight and overshadowing to surrounding receptors during the demolition and construction stage as presented in the updated 2017 EIA/ES (as amended).</p> <p>As such, the magnitude of impact, and so resultant likely effects, in relation to daylight, sunlight, overshadowing and solar glare, for the surrounding residential properties and amenity areas, would vary throughout the demolition and construction stage, depending on the levels of obstruction caused. The impacts and effects would almost certainly be less than that of the completed proposed development, given that the extent of permanent massing would increase throughout the construction stage, until the buildings are completed.</p> <p><u>Completed Development</u></p> <p>The February 2025 Amended Proposed Development is relevant for consideration of adjoining residential receptors, in terms of potential new daylight and sunlight impacts, and therefore has been technically re-assessed.</p> <p>Owing to the distance of the proposed alterations from sensitive open space amenity areas, there would be no changes in overshadowing and so this has not been re-assessed.</p> <p>The changes to massing and façade appearance have been technically assessed for solar glare.</p> <p>There would be no light pollution effects arising from the February 2025 Amended Proposed Development and so this has not been technically assessed.</p>

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
<p><i>existing residents in surrounding homes”.</i></p> <ul style="list-style-type: none"> A new version of BRE Guidelines, BR 209, were released in June 2022. This change was captured in the August 2022 EIL and resulted in no change to the methodology or criteria of assessment of impacts upon external receptors, since these assessments remain unaltered from BRE Guidelines in 2011. Daylight and Sunlight assessments within the February 2025 Amended Proposed Development was therefore not re-assessed in August 2022, since the proposed changes related to the PFS Parcel only, which is not of residential use. <p>The February 2025 Amended Proposed Development includes changes to the massing, layouts and facades of residential Blocks C, D, E1, E2 and F. As such, internal technical assessments have been undertaken based on BRE Guidelines 2022, the methodology of which differs from BRE Guidelines 2011. The new methodology comprises</p>			<p>Daylight and Sunlight</p> <ul style="list-style-type: none"> The daylight and sunlight results are presented within Appendix 5.2. All receptors have been technically re-assessed. For daylight, there would be very small non-material numerical alterations to Gilbeys Yard and Blocks A and B. The changes are unlikely to be noticeable and therefore considered negligible when compared with the previously assessed March 2023 Consented Scheme. There would also be no material changes to all other receptors along Juniper Crescent, Gloucester Avenue and Chalk Farm road. Therefore, the 2017 EIA/ES (as amended) conclusions remain valid. For sunlight, there would be no changes to the numerical results and so the conclusions of the 2017 EIA/ES (as amended) also remain valid for all receptors. <p>Overshadowing</p> <ul style="list-style-type: none"> No technical re-assessment has been undertaken for overshadowing, due to the distance of sensitive amenity areas from the February 2025 Amended Proposed Development. As such, the conclusions of the 2017 EIA/ES (as amended) remain valid. <p>Solar Glare</p> <ul style="list-style-type: none"> The solar glare results are presented within Appendix 5.3. All road and train receptors have been technically re-assessed. The solar glare assessment relates to the proposed massing and facade alterations of Blocks C, D, E1, E2 and F. Blocks A and B, and the PFS Parcel do not change as part of this application, and so they have not been re-assessed. The effects arising from these

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
<p>climate-based assessments to rooms (replacing Average Daylight Factor (ADF) and No-Sky Line (NSL)), and solar exposure to windows (replacing Annual and Winter Probable Sun Hours (APSH and WPSH)). The methodology for assessing internal overshadowing remains unaltered from BRE Guidelines 2011.</p>			<p>buildings would remain as reported in the 2017 EIA/ES (as amended).</p> <ul style="list-style-type: none"> • The assessments have shown no material changes to the solar glare effects identified in the 2017 EIA/ES (as amended). • Therefore, the effects resulting from the February 2025 Amended Proposed Development would not alter the conclusions of the 2017 EIA/ES (as amended), which remain valid. <p>Daylight, Sunlight and Overshadowing Amenity</p> <p>The internal daylight, sunlight and overshadowing amenity of the February 2025 Amended Proposed Development has been assessed within Appendix 5.4.</p> <ul style="list-style-type: none"> • The report concludes that, despite numerical alterations due primarily to the change of methodology in BRE guidelines 2022, the February 2025 Amended Proposed Development would retain daylight and sunlight levels in line with or not significantly worse than those of the March 2023 Consented Scheme, providing future occupants with access to good levels of natural light. • With regard to overshadowing, all publicly accessible open space, communal areas and roof terraces would retain sunlight levels in line with, or not significantly different than, those of the most recently assessed March 2023 Consented Scheme, providing excellent amenity overall. • Appendix 5.4 also considers the daylight and sunlight impacts of the February 2025 Amended Proposed Development upon Blocks A and B. The results of these tests show no material alterations

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
			<p>to the levels of amenity of the March 2023 Consented Scheme.</p> <p>Updated Cumulative Effects</p> <p>There would be no cumulative effects over and above those reported in the 2017 ES (as amended).</p> <p>This is because, regarding the two cumulative schemes considered in the original 2017 ES:</p> <ul style="list-style-type: none"> • 44-44a Gloucester is not relevant for consideration due to distance; and • 100, 100a, 100b Chalk Farm Road is lapsed and so is longer relevant for assessment. <p>No new schemes have come forward with the potential to generate cumulative effects in respect of daylight, sunlight, overshadowing, solar glare and light pollution.</p>

Chapter 11: Wind Microclimate

<p>Since the August 2022 EIL, the following new policy and guidance have been published:</p> <ul style="list-style-type: none"> • The NPPF was updated in December 2024. The relevant paragraph is as follows: <ul style="list-style-type: none"> - Paragraph 135 of the National Planning Policy Framework states that <i>“Planning policies and decisions should ensure that developments...create places that are safe, inclusive and accessible and which promote health and well-being, with a high</i> 	<p>The built form conditions on-site have changed since the August 2022 EIL, since previous structures have all been demolished, and the construction of Blocks A and B has already started. The effects of these alterations are short term and temporary, and are assessed qualitatively in the Demolition and Construction Phase of the 2017 EIA/ES (as amended).</p> <p>For the purpose of this EIL, the baseline has been considered the same as that of the 2017 EIA/ES (as amended).</p>	<p>Summary of Residual Effects</p> <p>As per the 2017 EIA/ES (as amended) the wind microclimate within and around the application site would be expected to change gradually from the baseline conditions (as per the 2017 EIA/ES (as amended)) to the conditions resulting from the May 2020 Consented Scheme. The residual effects for the demolition and construction stage, as well as the completed development stage, would range from negligible to minor beneficial.</p> <p><u>Demolition and Construction</u></p> <p>Negligible</p>	<p>The proposed amendments included in the February 2025 Amended Proposed Development would have a negligible impact on the wind conditions on and off the application site. Therefore, the remaining conclusions defined in the 2017 EIA/ES (as amended) would remain. These are listed below and set out in Appendix 8.</p> <p>Updated Residual Effects</p> <p><u>Demolition and Construction</u></p> <p>The summary below is consistent with the 2017 EIA/ES (as amended) for Configuration 2, taking into consideration the qualitative assessment of the landscaping scheme and additional qualitative mitigation measures.</p>
---	---	---	--

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
<p><i>standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."</i></p> <p>However, there is no specific planning policy guidance dealing with microclimate in terms of pedestrian comfort set out in the revised NPPF.</p>		<p><u>Completed Development</u></p> <p>The summary below is for Configuration 2, taking into consideration the qualitative assessment of the landscaping scheme and additional qualitative mitigation measures.</p> <ul style="list-style-type: none"> • Comfort <ul style="list-style-type: none"> - Wind conditions at off-site residential amenity space suitable for sitting: Negligible - Wind conditions at thoroughfares suitable for sitting to strolling use (windiest season): Negligible to Moderate Beneficial - Wind conditions at entrances suitable for sitting to strolling use (windiest season): Negligible to Minor Beneficial - <i>subject to development of appropriate mitigation strategy through further testing</i> - Wind conditions at ground level amenity spaces suitable for sitting use (summer season): Negligible - <i>subject to development of appropriate mitigation strategy through further testing</i> - Wind conditions at roof terraces suitable for sitting use (summer season): Negligible - <i>subject to development of appropriate mitigation strategy through further testing</i> - Wind conditions at balconies suitable for sitting to standing use (summer season): Negligible - <i>subject to</i> 	<ul style="list-style-type: none"> • Comfort <ul style="list-style-type: none"> - Wind conditions at off-site residential amenity space suitable for sitting: Negligible - Wind conditions at thoroughfares suitable for sitting to strolling use (windiest season): Negligible to Moderate Beneficial - Wind conditions at entrances suitable for sitting to strolling use (windiest season): Negligible to Minor Beneficial - <i>Subject to development of appropriate mitigation strategy through further testing</i> - Wind conditions at ground level amenity spaces suitable for sitting use (summer season): Negligible - <i>Subject to development of appropriate mitigation strategy through further testing</i> - Wind conditions at roof terraces suitable for sitting use (summer season): Negligible - <i>Subject to development of appropriate mitigation strategy through further testing</i> - Wind conditions at balconies suitable for sitting to standing use (summer season): Negligible - <i>Subject to development of appropriate mitigation strategy through further testing.</i> • Strong Winds <ul style="list-style-type: none"> - There were no strong winds recorded during the 2017 EIA/ES (as amended) at the MS Parcel, and this would remain for the February 2025 Amended Proposed Development. <p>Updated Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <p>Negligible</p>

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
		<p><i>development of appropriate mitigation strategy through further testing</i></p> <ul style="list-style-type: none"> • Strong Winds <ul style="list-style-type: none"> - Two occurrences of strong winds exceeding the 15 m/s for more than 2.2 hours per year on the roof terrace of the PFS Block (193 and 195); however, access would only be required for plant maintenance. - No strong winds were recorded at the MS Parcel. <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <p>Negligible</p> <p><u>Completed Development</u></p> <ul style="list-style-type: none"> • Comfort <ul style="list-style-type: none"> - Wind conditions at off-site bus stops suitable for standing: None as there are no bus stops likely to be affected. - Wind conditions at off-site residential amenity space suitable for sitting: Negligible - Wind conditions at thoroughfares suitable for sitting to strolling use (windiest season): Negligible to Moderate Beneficial - Wind conditions at entrances suitable for sitting to strolling use (windiest season): Negligible to Minor Beneficial, Minor Adverse at probe locations 134, 161, 163, 165 and 168 - Wind conditions at ground level amenity spaces suitable for sitting use 	<p><u>Completed Development</u></p> <ul style="list-style-type: none"> • Comfort <ul style="list-style-type: none"> - Wind conditions at off-site bus stops suitable for standing: None as there are no bus stops affected. - Wind conditions at off-site residential amenity space suitable for sitting: Negligible - Wind conditions at thoroughfares suitable for sitting to strolling use (windiest season): Negligible to Moderate Beneficial - Wind conditions at entrances suitable for sitting to strolling use (windiest season): Negligible to Minor Beneficial, Minor Adverse at probe locations 134, 161, 163, 165 and 168 - Wind conditions at ground level amenity spaces suitable for sitting use (summer season): Negligible, Minor Adverse at probe locations 164, 167, 186 and 226 - Wind conditions at roof terraces suitable for sitting use (summer season): Negligible, Minor Adverse at 207, 213, 220, 226 and 238. - Wind conditions at balconies suitable for sitting to standing use (summer season): Negligible • Strong Winds: <ul style="list-style-type: none"> - There were no strong winds recorded during the 2017 EIA/ES (as amended) at the MS Parcel, and this would remain for the February 2025 Amended Proposed Development. <p>Although adverse effects have been reported, these are consistent with the conclusions of the 2017 EIA/ES (as amended) for Configuration 3. The 2017 ES stated that the proposed landscaping and additional mitigation identified, would successfully address the</p>

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
		<p>(summer season): Negligible, Minor Adverse at probe locations 164, 167, 186 and 226</p> <ul style="list-style-type: none"> - Wind conditions at roof terraces suitable for sitting use (summer season): Negligible, Minor Adverse at 207, 213, 220, 226 and 238. - Wind conditions at balconies suitable for sitting to standing use (summer season): Negligible <ul style="list-style-type: none"> • Strong Winds: <ul style="list-style-type: none"> - Occurrences of strong winds at locations 116, 193, 195 and 122, although the additional mitigation measures would address these exceedances. 	<p>windy conditions, such that the locations would be usable for their intended uses. This remains valid for the February 2025 Amended Proposed Development and would be demonstrated through further testing already secured.</p>

Volume 2A: Townscape and Visual

<p>Since the August 2022 EIL, the following new policy and guidance have been published:</p> <ul style="list-style-type: none"> • NPPF, December 2024; • PPG, February 2024; • Draft New Camden Local Plan Regulation 18, Consultation Version was revised in January 2024; and • GLA Planning Practice Note: Heritage Impact Assessments and the Setting of Heritage Assets (2023). 	<p>Blocks A and B on the application site are in an advanced state of construction. The height, scale and architecture of these new buildings has substantially altered the townscape conditions on-site. Nonetheless, in relation to the TVIA in the 2017 EIA/ES (as amended), since Blocks A and B formed part of the June 2018 Consented Scheme, they were considered as part of the assessment in the original 2017 EIA/ES.</p> <p>Whilst some of the cumulative schemes have been built and/or are under construction within the study area, these schemes have been</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> • Views: None to Major Adverse • Townscape Character Areas (TCAs): None to Major Adverse <p><u>Completed Development</u></p> <ul style="list-style-type: none"> • Views: <ul style="list-style-type: none"> - One Major Beneficial - Five Moderate Beneficial - One Minor Beneficial - One Major Neutral - Nine Moderate Neutral - Twelve Minor Neutral - Seven Negligible 	<p>Updated Residual Effects</p> <p><u>Demolition and Construction</u></p> <p>The demolition and construction effects are likely to be the same as those presented in the 2017 EIA/ES (as amended) due to the similar nature and degree of the amendments proposed.</p> <p><u>Completed Development</u></p> <p>Appendix 6 shows the updated Verified Views of the February 2025 Amended Proposed Development in selected key views from the 2017 EIA/ES (as amended), in which the Amended Proposed Development may be visible.</p> <p>The February 2025 Amended Proposed Development includes very little change to the height and massing of Blocks C, D, E1, E2 and F, and heights have been reduced. There would also be very minor changes to</p>
--	---	--	---

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
<p>These updated documents would not affect the scope or methodology for the updated townscape and visual assessment.</p> <p>The proposed amendments and the February 2025 Amended Proposed Development, as a whole, do not introduce any new issues for consideration in the updated assessment.</p>	<p>considered as part of the cumulative scenario as agreed with the LBC.</p> <p>Accordingly, the baseline conditions, as reported in the 2017 EIA/ES (as amended), remain valid.</p>	<ul style="list-style-type: none"> - One Minor Adverse • TCAs: <ul style="list-style-type: none"> - One Minor Beneficial - Four None - Five Negligible <p>Summary of Cumulative Effects</p> <ul style="list-style-type: none"> • The visual and townscape effects would be neutral or positive in all cases 	<p>the detailed designs, primarily as a result of the insertion of second staircases, to ensure fire safety compliance, and due to a reduction in floor-to-floor heights. Nonetheless, the overall architectural character, composition and appearance of the buildings would be essentially unchanged from the March 2023 Consented Development.</p> <p>The amendments to the overall appearance of the buildings in views would be negligible. There would be no significant changes to the views or townscape character, as a result of the February 2025 Amended Proposed Development.</p> <p>Although there would be an imperceptible difference to the heights of Blocks C - F in the views, the updated Verified Views in Appendix 6 serves to demonstrate that the proposed amendments would amount to a negligible change to the extent of the visibility of the March 2023 Consented Scheme and negligible change to the massing, appearance and design character of the March 2023 Consented Scheme.</p> <p>Additional mitigation would therefore not be required.</p> <p>Accordingly, no new or amended significant townscape and visual effects are likely to arise for the February 2025 Amended Proposed Development.</p> <p>Updated Cumulative Effects</p> <p>A list and map of cumulative schemes which have been approved since the August 2022 EIL and considered in this assessment is provided at Table 6.</p> <p>All of the cumulative schemes which have gained planning approval are assumed to relate well to the surrounding townscape character – both existing and emerging - in local and wider views, in accordance with relevant planning policy. These additional schemes are not therefore anticipated to introduce any</p>

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
			<p>additional adverse effects in combination with the February 2025 Amended Proposed Development (which is almost identical to the consented scheme in respect of townscape and visual matters).</p> <p>The previously reported inter-project effects within the 2017 EIA/ES (as amended) would therefore remain valid.</p>

Volume 2B: Built Heritage

<p>Since the August 2022 EIL, the following new policy and guidance have been published:</p> <ul style="list-style-type: none"> The NPPF, December 2024. The policies specific to built heritage matters, relevant to the February 2025 Amended Proposed Development, are not materially different from those in the previous NPPF (2023) version; however, several paragraphs have been re-numbered; GLA Planning Practice Note: Heritage Impact Assessments and the Setting of Heritage Assets (2023). <p>These updated documents would not affect the scope or methodology for the updated built heritage assessment.</p> <p>The proposed amendments and the February 2025 Amended</p>	<p>A review of the National Heritage List for England, and the Council's website, confirms that no additional built heritage assets have been identified within the study area, as described for the built heritage assessment in the updated 2017 EIA/ES (as amended).</p> <p>Accordingly, the baseline conditions set out in the updated 2017 EIA/ES (as amended) remain valid for this review.</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Conservation Areas: Moderate Adverse to Minor Adverse Statutorily listed buildings: Moderate Adverse to Negligible Registered parks and gardens: Moderate Adverse Locally listed buildings: Minor Adverse <p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> Conservation areas: one Negligible, one Neutral, one Minor Adverse and one Moderate Adverse. Statutorily listed buildings: eleven Negligible, 20 Neutral and five Minor Adverse. Registered parks and gardens: Moderate Adverse. Locally listed buildings: twelve Negligible, twelve Neutral and one Minor Beneficial. <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> None 	<p>Updated Residual Effects</p> <p>A Heritage Statement Addendum has been prepared as Appendix 7 to this EIL and provides a proportionate assessment of the impacts of the February 2025 Amended Proposed Development on the significance of the relevant built heritage assets. The assessment has been informed by updated Verified Views, provided in Appendix 7.</p> <p>It is only the minor reduction in the height of Blocks C, D, E1, E2 and Block F; minor increase in the footprint of Block E1; and targeted elevational changes that would have implications for the impacts on the significance of the relevant built heritage assets as part of the February 2025 Amended Proposed Development.</p> <p>The proposed targeted and minor changes to the buildings on the MS Parcel would not give rise to any new or amended effects reported within the 2017 EIA/ES (as amended), as summarised below.</p> <p><u>Demolition and Construction</u></p> <p>The proposed amendments to the MS Parcel would not materially alter the scale and scope of construction methods and works. There would be no change to the consented proposals for the PFS Parcel. Accordingly, the demolition and construction effects of the February</p>
---	---	--	--

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
<p>Proposed Development, as a whole, do not introduce any new issues for consideration in the updated assessment.</p>		<p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> • Neutral 	<p>2025 Amended Proposed Development are likely to be the same as those presented in the 2017 EIA/ES (as amended).</p> <p><u>Completed Development</u></p> <p>The previously assessed impacts on the significance of the relevant built heritage assets, arising from changed relationships and contrasts associated with built form on the application site as new elements of their respective settings, would not be materially changed because of the proposed minor increase in the heights of Blocks C, D, E1, E2 and Block F; minor increase in the footprint of Block E1; and targeted elevational changes on the MS Parcel as part of the February 2025 Amended Proposed Development.</p> <p>Where those new relationships were previously reported in the 2017 EIA/ES (as amended) as causing harm/having an adverse effect on the significance of a small number of heritage assets, the February 2025 Amended Proposed Development would not cause any further harm or changes to those adverse effects on the significance of the following built heritage assets. Having regard to the proposed minor reductions heights of Blocks C, D, E1, E2 and Block F; minor increase in the footprint of Block E1; and targeted elevational changes are comparatively minor amendments in the context of the authorised scale of change on the application site and previously consented new built form, there would be no change in the overall reported residual effects on the particular significance of the following built heritage assets and would not change those previously reported effects:</p> <ul style="list-style-type: none"> • The Roundhouse (Grade II* listed building); • The Interchange Building (Grade II listed building);

Table 7: Environmental Implications of February 2025 Amended Proposed Development

Legislation, Policy, Guidance and Assessment Methodology	Baseline Conditions	Conclusions of 2017 EIA/ES (as amended)	Updated Assessment of February 2025 Amended Proposed Development
			<ul style="list-style-type: none"> • Nos. 1-15 Prince Albert Road (Grade II listed buildings); • Primrose Hill Infants School (Grade II listed building); • The Engineer PH (Grade II listed building); • Primrose Hill Conservation Area; • Harmood Conservation Area; and • Regent’s Park (Grade I Park and Garden of Special Historic Interest). <p>Additional mitigation would not be required.</p> <p>Updated Cumulative Effects</p> <p>In respect of cumulative effects, the previously reported inter-project effects within the 2017 EIA/ES (as amended) would remain valid, due to the non-material nature of cumulative scheme updates and because no new or amended significant built heritage effects have been reported for the February 2025 Amended Proposed Development.</p> <p>In respect of the lapsed cumulative schemes there would be no amendment to the assessment previously reported. This is because of the minor nature of the proposed amendments to the design, height and massing of buildings on the MS Parcel and the relative disposition of the lapsed cumulative schemes.</p>

Cumulative Effects

No new or amended significant inter- or intra- project cumulative environmental effects have been reported for the February 2025 Amended Proposed Development.

As the EIA conclusions for the February 2025 Amended Proposed Development would remain consistent with the 2017 EIA/ES (as amended), there would be no change to the previously reported project cumulative effects.

Conclusions

The February 2025 S73 application seeks to amend the consented proposals for the MS Parcel of the March 2023 Consented Scheme. Due to the minor nature of the February 2025 Amended Proposed Development, the updated EIA has concluded that there would be no material change to the previously reported 2017 EIA/ES (as amended) conclusions. Thus, no new or amended significant environmental effects would arise.

Should you or any of the consultees have any questions for clarification, please do not hesitate to contact Michelle Wheeler at Ramboll.

Yours sincerely

Michelle Wheeler

Principal
Impact Assessment
D +44 207 808 1423
M +44 7921 058107
mwheeler@ramboll.com

Encl.	Appendix 1	Transport Technical Note
	Appendix 2	Air Quality Assessment Addendum
	Appendix 3	Air Quality Positive Statement
	Appendix 4	Noise and Vibration Assessment Addendum
	Appendix 5.1	Daylight, Sunlight and Overshadowing Massing Drawings
	Appendix 5.2	Daylight and Sunlight Results
	Appendix 5.3	Solar Glare Results
	Appendix 5.4	Internal Daylight, Sunlight and Overshadowing Report
	Appendix 6	Townscape and Visual Impact Assessment Addendum
	Appendix 7	Built Heritage Assessment Addendum
	Appendix 8	Wind Microclimate Technical Note