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Our Ref: 2012/3500/P
Your Ref: 30222E-108.C.001.MM_MM
Please ask for: **Conor McDonagh**
Telephone: 020 7974 **2566**

7 August 2012

Dear Ms Morrissey,

Town and Country Planning (Environmental Impact Assessment) (England and Wales)
Regulations 1999

Re: Land at 1-9 Chalk Farm Road, Hawley Wharf

I refer to your letter dated 3 July 2012, which was prepared on behalf of Stanley Sidings Ltd (the 'Applicant'), seeking the Local Planning Authority's (LPA) comments.

In accordance with the EIA Regulations, an Environmental Statement (ES) will be produced to support the planning application for the redevelopment of the site known as Land at 1-9 Chalk Farm Road, Hawley Wharf.

It is proposed that the scope of the EIA remains similar to that of the previous scoping report submitted in September 2010 and responded to by the LPA under reference 2010/4979/P. This response helped inform the comprehensive EIA that was undertaken to support the previous planning application (ref: 2011/4932/P), which was submitted in September 2011, and titled as 'the Camden Lock Village Environmental Statement'. The scope remains similar by virtue of the fact that the revised development proposal would be of the similar magnitude (although reduced in scale and floorspace), nature and extent and be located within the same environmental setting. The principal development revisions are listed below:

- Reducing the massing and height of Buildings C1 and C2;
- Reducing the building depth of Building C1;
- Re-orientating the massing of C2;
- Increasing the local public open space in Area C;
- Increasing the arches public open space between Areas A and D;
- Opening up additional viaduct arches between Areas A and D;
- Widening of viaduct routes;



- Increasing the building setback from Regent's Canal;
- Reconfiguring the canal space in Area A;
- Redefining the towpath edge;
- Introducing workspace to the Market Building in Area A; and
- Architectural change to Building A facade.

The content of the previously accepted ES was as follows:

- ES Volume 1 – Main Text.
 - Chapter 1: Introduction
 - Chapter 2: EIA Methodology
 - Chapter 3: Existing Land Uses and Activities
 - Chapter 4: Alternatives
 - Chapter 5: The Development
 - Chapter 6: Development Programme, Demolition and Construction
 - Chapter 7: Waste Management
 - Chapter 8: Socio-Economics
 - Chapter 9: Built Heritage
 - Chapter 10: Transportation and Access
 - Chapter 11: Noise and Vibration
 - Chapter 12: Air Quality
 - Chapter 13: Archaeology
 - Chapter 14: Ground Conditions and Contamination
 - Chapter 15: Surface Water Drainage and Flood Risk
 - Chapter 16: Wind
 - Chapter 17: Daylight, Sunlight and Overshadowing
 - Chapter 18: Ecology
 - Chapter 19: Cumulative Effects
 - Chapter 20: Summary of Residual Effects
- ES Volume 2 – Figures.
- ES Volume 3 – Townscape and Visual Assessment.
- Non-Technical Summary.

In relation to cumulative effect, the LPA confirms that there have been no significant changes since the previous application. An extant planning permission (ref: 2009/3072/P) remains at 13 Hawley Crescent and 29 Kentish Town Road, located approximately 95m at its closest point to the southern boundary of the site. This scheme would provide a mix of uses including 1,369m² of commercial floorspace (Class B1/B8) and 114 student accommodation units with a five storey building. Since the last ES, a further planning permission (ref: 2012/0974/P) now exists at 29-33 Chalk Farm Road, located approximately 80m along the road to the north. This would include a mix of uses comprising 6 x retail units (Class A1/A3) at basement and ground floor level and 40 student residential units above.

It is the LPA's opinion that the content of the previous ES proposal remains relevant, but the assessment should be fully considered against the most recently adopted legislation such as the National Planning Policy Framework (NPPF) 2012, London Plan 2011 and its SPGs, and the Council's Camden Planning Guidance (CPG) 2011. All reference to now superseded policy (PPG's and PPS's etc) should be removed, and amended in line with current planning policy.

Consultation response

The relevant statutory bodies have been consulted. Comments have been received from the Environment Agency, Canal & River Trust London (formerly known as British Waterways), Transport for London, Metropolitan Police Authority, and English Heritage. Internal departments within the Council were also consulted.

Comments from non-statutory bodies, namely the Regent's Canal Conservation Area Advisory Committee (CAAC) and Jeffrey Street CAAC, were also received. Both CAAC's are opposed to the loss of the Hawley Road villas. It is the LPA's opinion that the EIA should recognise the villas as 'non-designated heritage assets' and assess their loss against current planning policies, including the NPPF and English Heritage guidance.

The Council has not consulted residents however an electronic copy is available on the Council's website.

The comments received from statutory and non-statutory bodies, generally, do not request any additional assessment to what has already been undertaken for the previous EIA.

There has been a request for a Health Impact Assessment (HIA) to be undertaken. The LPA acknowledges that provision of a HIA is non-statutory (best practise only) however policy 3.2 of the London Plan states that the impacts of major development should be considered through the use of HIAs. Provision of a HIA would also dovetail with many of the Council's planning policies, particularly Core Strategy Policy CS16 'Improving Camden's Health and well-being'. Consequently, it is the LPA's opinion that a HIA be undertaken and form part of the EIA, or submitted as a stand alone document in support of a planning full application.

Finally, the LPA requests that all previous surveying work would need to be revised and/or updated as necessary to accord with any change of site condition or planning policy.

I trust these comments will assist you in producing the EIA. These comments are provided without prejudice to the right, if necessary, to raise further issues for consideration as part of the future assessment of the proposals.

Yours sincerely

A handwritten signature in dark ink, appearing to be 'Ed Watson', written over a light blue horizontal line.

Ed Watson
Assistant Director Planning and Public Protection

