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Our Ref: 30222E-102.C.006. RB  
Your Ref:

Date: 5 January 2012

Sara Whelan  
Department of Planning  
London Borough of Camden  
Town Hall  
Argyle Street  
London  
WC1H 8ND

Dear Ms Whelan

**RE: Camden Lock Village (Hawley Wharf) – Post Application Development Amendments – Implications for the Environmental Impact Assessment**

**Background and Purpose of this Letter**

On 30<sup>th</sup> September 2011, Stanley Sidings Ltd (the Applicant) submitted a hybrid planning application for the proposals known as Camden Lock Village (Hawley Wharf) (planning application reference 2011/4932/P) to the London Borough of Camden (LBC) for determination. The proposals sought for approval are hereafter referred to as the 'Development'.

In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations, 2011 (S.I1824) (the 'EIA Regulations'), an Environmental Impact Assessment (EIA) was undertaken to assess the likely significant environmental effects of the Development. The findings of the EIA were presented in the Environmental Statement (ES) (Report Ref: E3022\_R\_2.1.1) (hereafter referred to as the 'September 2011 ES'), which accompanied the hybrid planning application.

Following submission of the hybrid planning application and consultation with LBC and the Hawley Wharf Area Working Group (HWAWG), amendments have been made to the design of the Development. As such, a range of substitute planning application drawings have been submitted to LBC for approval together with:

- Revised Hawley Wharf School Design Principles;
- A Design and Access Statement Addendum; and
- A revised Floor Area Schedule.

In summary, the design amendments to the Development are as follows:

- A change to the internal layout of Building A at Level 00 (ground level);
- A change to the location and orientation of the centrally located staircase within Building A;
- An increase to the height of the brick arches of Building A;
- A reduction to the height of the restaurant pavilion of Building A, and therefore the overall height of Building A by 0.5m;
- A realignment of the building line of Number 6 Chalk Farm Road to that of the existing Numbers 1 to 5 Chalk Farm Road;
- A realignment of the building line of Number 7 / 8 Chalk Farm Road at its north-western façade abutting the pedestrian route, and at its south-western façade to realign with Numbers 1 to 5 Chalk Farm Road;

- The retention and / or reinstatement of all chimneys on the roofs of Numbers 1 to 8 Chalk Farm Road;
- Repositioning of the staircase proposed to the rear of Numbers 1 and 2 Chalk Farm Road;
- A cutback to the western façade of Building D;
- The provision of two new windows within the northern façade of Building D;
- Re-organisation of the layout and the mix of residential units within Building C1;
- Re-organisation of balconies on Levels 01, 02, 04 and 05 within Building C1;
- A change to the window typology within the northern façade of Building C1;
- Removal of the cinema entrance lobby at Level 00 within Building C1;
- A cut back to the higher levels of Building C2 and a subsequent increase in balcony area within the north of Building C2;
- Reorganisation of the layout and the mix of residential units within Building C2;
- A change to the mix of uses at Level 00 and Mezzanine Level of Building C2 from Use Class B1 to Use Class A1 / B1;
- The introduction of a minimum and maximum height to the zone of projection at the northern façade of School Block S1;
- A change to the internal layout of residential units within Levels of 01 to 09 and Levels 01 to 03 within Buildings W and X respectively;
- The provision of an additional window within the southern façade of Building W;
- The provision of two additional windows within the northern façade of Building W;
- A change to the materials incorporated within the façades at the higher levels of Building W;
- An overall increase to the quantum of living roofs on Buildings C1, C2, D, W and X;
- A change in floor areas in respect of retail, business, industrial, leisure and residential uses;
- A change to the number of residential units from 184 to 183 (a reduction of 1 residential unit); and
- A change to the mix of residential units as follows from:
  - 103 2-bed units to 109 2-bed units (an increase of 6 2-bed units); and
  - 61 1-bed units to 57 1-bed units (a reduction of 4 1-bed units).

A detailed explanation of the design amendments to the Development are provided later in this letter.

In view of the above this letter and its Appendices have been prepared in order to consider and demonstrate whether any of the design amendments to the Development would significantly and / or materially alter the conclusions and recommendations (mitigation measures) of the technical assessments undertaken as part of the EIA and presented in the September 2011 ES.

## **Methodology**

Waterman Energy, Environment & Design (Waterman EED) and all relevant EIA technical contributors who input to the September 2011 ES have carefully reviewed all design amendments to the Development. Where it has been considered that the design amendments to the Development would not significantly or materially alter the conclusions and recommendations (mitigation measures) of the technical assessments undertaken as part of the EIA and presented in the September 2011 ES, this is clearly stated and justified based upon professional and expert judgement and experience. Conversely, where it has been considered that the design amendments to the Development could significantly and materially affect the conclusions and recommendations (mitigation measures) of the technical assessments undertaken as part of the EIA and presented in the September 2011 ES, such technical assessments have been re-worked accounting for the design amendments to the

Development. In such cases, new technical assessments are appended to this letter and **supersede** those which were reported within the September 2011 ES.

In view of the above, this letter, its appendices and the September 2011 ES, now form the ES for the purposes of the hybrid planning application, as amended.

## **Relevant EIA Technical Assessment Review**

### ***ES Chapter 4: Alternatives and Design Evolution***

As indicated previously, the amendments to the Development have been made in response to post-application consultation with LBC and the HWAWG. An explanation of the amendments to the Development have been provided earlier in this letter and further details are provided below. However, these amendments have been made primarily in respect of:

- Improving internal daylighting to the proposed residential properties within Buildings C1, C2, W and X;
- Improvements to pedestrian circulation within the Development by realigning the footprints of Numbers 6 and 7 / 8 Chalk Farm Road, and internally within Building A;
- A change to the Community Space by omission of the cinema entrance lobby within Building C1;
- Reduce the bulk and mass of Building C2;
- A change to the Arches Space by cutting back Building D at its western façade;
- Changes to the façade treatments of Buildings C1, W and X to revise the Development's visual appearance; and
- The introduction of a minimum and maximum height to the zone of projection at the northern façade of School Block S1 to ensure there is no overbearing relationship to the Grade II Listed Number 1 Hawley Road.

These design amendments represent a further stage in the evolution of the Development. However, the key themes and conclusions indicated within Chapter 4: Alternatives and Design Evolution, as reported in the September 2011 ES remain applicable and valid.

### ***ES Chapter 5: The Development***

The design amendments to the Development do not significantly and substantially change the overall and general description of the Development as reported in the September 2011 ES. However, for absolute clarity the design amendments to the Development are described as follows on a building by building basis with reference to the aforementioned substitute planning application drawings. A revised land use area schedule and schedule of residential unit mix and numbers is also provided.

#### ***Building A***

- As indicated by Planning Application Drawings P2999 and P3000, the internal circulation spaces within Building A have been reorganised to create more space at Level 00 (ground level) by cutting back the retail units at three corners to increase pedestrian circulation space. As such, a decrease of 216m<sup>2</sup> GEA, from 5,154m<sup>2</sup> GEA to 4,938m<sup>2</sup> GEA in the retail floor area has resulted;
- As indicated by Planning Application Drawings P3000 to P3004, the centrally located staircases that connect the western and eastern elements of Building A would be set back slightly more and reoriented from their original proposed position; and
- As indicated by Planning Application Drawing P3200 and P3300, the height of the brick arches, from which Building A is composed, would be raised by 1.18m and the height of the restaurant pavilion at Level 04 would be reduced by 0.5m. As such, the overall height of Building A would be reduced by 0.5m.

#### *Numbers 1 - 8 Chalk Farm Road*

- As indicated by Planning Application Drawing P3000, the footprint of Number 6 and 7 / 8 Chalk Farm Road has been revised to align with the existing Numbers 1 to 5 Chalk Farm Road. Furthermore, the footprint of Number 7 / 8 Chalk Farm Road has been revised to align appropriately with the pedestrian route to the north. As such, a minor decrease in the overall market retail floor area provided by the Development within Numbers 1 to 8 Chalk Farm Road and Building A has resulted;
- All chimneys would be retained or reinstated on the roofs of Numbers 1 to 8 Chalk Farm Road; and
- As indicated by Planning Application Drawings P3101 and P3305 the staircase located to the rear of Numbers 1 and 2 Chalk Farm Road has been repositioned slightly.

#### *School Block S1 and School Block S2*

- Planning Application Drawing P4401 indicates a zone of protrusion from School Block S1. Previously this had a maximum height of 39.05m AOD, however this has been amended and this zone, would now have a minimum and maximum height of +29.80m AOD to +34.30m AOD respectively.

#### *Buildings W and X*

- As indicated by Planning Application Drawings P4001 to P4009, a change to the internal layout of residential units within Levels of 01 to 09 and Levels 01 to 03 is proposed within Buildings W and X respectively. However, no change has occurred to overall unit numbers or floor areas within these buildings;
- An additional window is proposed to the southern elevation of Building W;
- Two additional windows are proposed to the northern elevation of Building W;
- The visual appearance of the façade at the higher levels of Building W would be changed by the replacement of metal capping with terracotta capping, and the exposure of a concrete slab edge panel to match the finish of the balconies of this building. Making these changes to the façade would clarify the composition as a whole and articulate the way in which the building meets the sky; and
- The quantum of living roofs is decreased by 16m<sup>2</sup> on Buildings W and X (considered together).

#### *Building C1*

- As indicated by Planning Application Drawings P5001 to P5005, the organisation of residential units within Building C1 has been amended. Although this would not change in the overall number of residential units proposed within Building C1, the mix of these units would change as follows:
  - 23 2-bed units to 30 2-bed units (an increase of 7 2-bed units); and
  - 28 1-bed units to 21 1-bed units (a decrease of 7 1-bed units).
- As a result of the re-organisation of the residential units within Building C1, this has also reconfigured the balconies at Levels 01, 02, 04 and 05;
- The window typology to the northern façade of Building C1 has been amended;
- As indicated by Planning Application Drawing P5000, the entrance lobby to the proposed cinema at Level 00 would be omitted in order to increase the size of the Community Space. As a result, the leisure land use proposed would decrease by 23m<sup>2</sup> GEA, from 3,471m<sup>2</sup> GEA to 3,448m<sup>2</sup> GEA; and
- A minor increase in the quantum of living roofs provided so that 645m<sup>2</sup> would be provided by Building C1.

### *Building C2*

- Planning Application Drawings P6004 to P6010 indicate that from Level 03 to 10 the northern corner of Building C2 would be cut back. This would result in the internal re-organisation of the building leading to a decrease of one residential unit and the following change in the mix of the residential units:
  - 11 3-bed units to 8 3-bed units (a reduction of 4 3-bed units);
  - 34 2-bed units to 33 2-bed units (a reduction of 1 2-bed unit); and
  - 6 1-bed units to 9 1-bed units (an increase of 3 1-bed units).
- A change to the mix of uses at Level 00 and Mezzanine Level of Building C2 from Use Class B1 to Use Class A1 / B1 to provide flexibility and the space could be used as a café;
- The cut back to the northern corner of Building C2 has also resulted in a change to the orientation and size to balconies in this location; and
- A decrease to the quantum of living roofs provided of 34m<sup>2</sup>, and a reconfiguration of roof mounted photovoltaic panels.

### *Building D*

- Planning Application Drawings P7000 to P7004 indicate that the building line of the western façade of Building D would be aligned with the edge of the adjacent Arches Space and to increase the Arches Space;
- Two additional windows have been included within the northern façade of Building D; and
- The quantum of living roofs provided would be increased by 60m<sup>2</sup> to provide 650m<sup>2</sup> of living roof,

### Overall Development Area Schedule

The following table presents the Development Area Schedule accounting for the design amendments to the Development. For clarity, the final column of the table provides a comparison to the Development submitted in September 2011.

Land Use and Class	Amended and Proposed Floorspace Areas Gross External Area (GEA) (m <sup>2</sup> )	Difference Compared to the Development Submitted For Approval in September 2011 Gross External Area (GEA) (m <sup>2</sup> )
<i>Retail, comprising:</i>		
Market Retail (A1)	6,012	-262
Local Retail (A1)	616	-14
Restaurant and Café (A3)	1,857	-73
Hot Food Takeaway (A5)	766	-9
<i>Commercial, comprising</i>		
Business and Industrial (B1, B1c and B2)	8,341	-805
Flexible Café and Business (A1 / B1)	786	n/a
Residential (C3)	21,531	-507
Leisure (D2)	3,448	-23
Education (D1)	1,931	None
Plant and Ancillary	3,579	-1
<b>TOTAL Floor Area</b>	<b>48,876</b>	<b>-913</b>

### Provision of Residential Units

The following table presents the residential unit mix proposed within the Development accounting for the design amendments to the Development. For clarity a comparison is provided in relation to the Development submitted for approval in September 2011.

Building	1- Bedroom	Difference*	2- Bedroom	Difference*	3- Bedroom	Difference*	Total	Total Difference*
Building W	3	0	33	0	0	0	<b>36</b>	<b>0</b>
Building X	5	0	1	0	3	0	<b>9</b>	<b>0</b>
Building C1	21	-7	30	+7	0	0	<b>51</b>	<b>0</b>
Building C2	9	+3	33	-1	8	-3	<b>50</b>	<b>-1</b>
Building D	19	0	12	0	6	0	<b>37</b>	<b>0</b>
<b>TOTAL</b>	<b>57</b>	<b>-4</b>	<b>109</b>	<b>+6</b>	<b>14</b>	<b>-3</b>	<b>183</b>	<b>-1</b>

Notes: \* This is the Difference Compared to the Development Submitted for Approval in September 2011

### ES Chapter 6: Development Programme, Demolition and Construction

No changes are proposed to the demolition and construction programme, sequence of works and / or demolition and construction activities as reported within the September 2011 ES. As such, Chapter 6 of the September 2011 ES remains applicable and valid and the assessment of the demolition and construction works within each of the technical assessments reported within the September 2011 ES also remain applicable and valid.

### ***ES Chapter 7: Waste Management***

It is considered that the magnitude of floor area changes, together with the overall reduction of one residential unit proposed would not materially alter the waste generated by the Development accounting for the design amendments. As such, the waste storage provision and waste servicing management strategy remains as per the original Development proposals and is considered to remain appropriate and adequate. The waste assessment reported within the September 2011 ES is therefore considered to remain applicable and valid.

### ***ES Chapter 8: Socio-Economics***

The authors of the socio-economic assessment and ES Chapter of the September 2011 ES (Quod) conclude that the small changes in the floor space areas, residential unit numbers and the residential mix would not give rise to significantly different completed Development employment generation, population generation and child yields. Furthermore, the proposed design amendments would not alter the quantum of playspace, or the quality of public realm offer. As such, the significance of all socio-economic effects of the Development, accounting for the design amendments, would be as reported within the September 2011 ES.

### ***ES Volume 3: Townscape and Visual Assessment***

It is recognised that a number of design amendments would alter the visual appearance of the Development and that some design amendments would be visible and apparent in a range of assessment views considered in the townscape and visual assessment of the September 2011 ES. Accordingly, the full range of AVRs have been updated to account for the design amendments together with the supporting townscape and visual assessment text. This work is presented within Appendix A of this letter and supersedes that of the September 2011 ES.

Despite, the alteration of the visual appearance of the Development, the revised townscape and visual assessment concludes that the design amendments would not materially change the significance of effects that were reported within September 2011 ES.

### ***ES Chapter 9: Built Heritage***

Steven Levrant Heritage Architecture have reviewed the design amendments to the Development. They conclude that all design amendments relating to the appearance and form of the Development are not of a magnitude that would bring about significantly different effects upon built heritage assets over and above those identified in the September 2011 ES. It is therefore concluded that the results of the built heritage assessment reported in the September 2011 ES remain applicable and valid.

### ***ES Chapter 10: Transportation and Access***

The authors of the Transport Assessment (TA) and transportation and access ES Chapter of the September 2011 ES (Arup) conclude that the small changes in floor space areas, residential unit numbers and residential mix would not give rise to significantly different completed Development trip generation of all transport modes. In addition, the proposed design amendments would not alter the quantum or location of proposed vehicular parking spaces, cycle spaces, servicing arrangements, and pedestrian routes and nodes. Accordingly, the significance of all transportation and access effects of the Development accounting for the design amendments would be as reported within the September 2011 ES.

### ***ES Chapter 11: Noise and Vibration***

The minor changes with regard to the revised internal layouts of residential units, and the provision of balconies within Buildings C1, C2, W and X would not significantly change the potential effects identified within the noise and vibration assessment reported within the September 2011 ES in terms of introducing residential uses to the Site; the proposed residential units would be located in the same positions and the predominant sources of noise remain as stated in the September 2011 ES.

As noted earlier in this letter, the design amendments of the Development would not significantly change the quantum of trips generated by the Development and, therefore the predicted traffic flows.

Furthermore, no changes are proposed to the provision of potentially noise emitting plant and machinery. Accordingly, the predicted operational traffic and building services plant noise and vibration effects associated with the completed and operational Development would not change from that reported within the September 2011 ES.

#### ***ES Chapter 12: Air Quality***

The minor changes with regard to the revised internal layouts of residential units within Buildings C1, C2, W and X would not significantly change the potential effects identified in the air quality assessment reported within the September 2011 ES in terms of introducing residential uses to the Site.

As noted earlier in this letter, the design amendments of the Development would not significantly change the quantum of trips generated by the Development, and, therefore the predicted traffic flows. Furthermore, the Energy Strategy has not been changed. Accordingly, the predicted operational traffic related emissions and heating plant emissions associated with the completed and operational Development would not change from that reported within the September 2011 ES.

#### ***ES Chapter 13: Archaeology***

The design amendments to the Development would not result in any changes to the proposed below ground works and structures associated with the Development. As such, there would be no change to the assessment of archaeology reported within the September 2011 ES.

#### ***ES Chapter 14: Surface Water Resources and Flood Risk***

The design amendments to the Development would not significantly change the location, quantum and proportion of hard and soft landscaping and built form. As such, the proposed surface water drainage strategy prepared for the completed Development remains valid and appropriate. Furthermore, the provision of living roofs within the Development are not a fundamental component of the aforementioned surface water drainage strategy. As such, the overall minor increase (19m<sup>2</sup>) of living roofs, would not bring about significantly different surface water resources and flood risk assessment.

On the basis of the above the assessment as reported within the September 2011 ES remains valid and applicable.

#### ***ES Chapter 15: Ground Conditions and Contamination***

As noted earlier, the design amendments would not result in any changes to the proposed below ground works and structures associated with the Development. In addition, there would be no change to the type of land uses proposed within the Development. Therefore the ground conditions and contamination assessment reported within the September 2011 ES remains valid and applicable.

#### ***ES Chapter 16: Wind***

Wind microclimate assessors RWDI have reviewed the design amendments to the Development. They have concluded that the small changes to the building line of Numbers 6 and 7 / 8 Chalk Farm Road, the cut back to Building D, and the loss of the cinema entrance lobby of Building C1 would not give rise to significantly different wind microclimate conditions at ground level. The reorganisation of the residential units within Buildings C1 and C2 has led to a change in the location and orientation of the balconies within these buildings. However, the balconies remain recessed along the facade of the buildings, and as such these changes would not materially affect the wind microclimate amenity for residents as reported within the September 2011 ES. Furthermore, the reduction in height of the restaurant pavilion and overall height of Building A by 0.5m would not give rise to significantly different wind microclimate conditions. Accordingly, the wind assessment reported within the September 2011 ES remains valid and applicable.



### ***ES Chapter 17: Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare***

As indicated previously, the internal reorganisation of the residential units within Buildings C1, C2, W and X, and changes to window typology were undertaken to improve internal daylighting conditions within the Development. Accordingly, the daylight, sunlight, overshadowing, light pollution and solar glare assessment undertaken by Gordon Ingram Associates and reported within the September 2011 ES has been updated to account for the design amendments. This work is presented within Appendix B of this letter and **supersedes** the ES Chapter 17 and its supporting technical appendices included within September 2011 ES.

It is the professional opinion of Gordon Ingram Associates that overall the assessment of daylight, sunlight, overshadowing, light pollution and solar glare remains acceptable for an urban environment.

### ***ES Chapter 18: Ecology***

The design amendments to the Development, including the overall minor increase (19m<sup>2</sup>) of living roofs would not significantly change the ecological assessment as per the original Development proposals. Accordingly, the ecology chapter within the September 2011 ES remain valid and appropriate.

### ***ES Chapter 19: Cumulative Effects***

Since the submission of the hybrid planning application in September 2011 there are no additional consented, or reasonably foreseeable schemes to be considered within the assessment of cumulative effects.

Given that this letter has concluded that the September 2011 ES technical assessments for:

- Waste Management;
- Socio-Economics;
- Built Heritage;
- Transportation and Access;
- Noise and Vibration;
- Air Quality;
- Archaeology;
- Surface Water Resources and Flood Risk;
- Ground Conditions and Contamination;
- Wind; and
- Ecology

remain applicable and valid, the cumulative effects in relation to the topic areas remain as reported in the September 2011 ES.

Despite the provision of a new townscape and visual assessment (refer to Appendix A) and a new daylight, sunlight, overshadowing, light pollution and solar glare assessment (refer to Appendix B), the cumulative scheme, 13 Hawley Crescent and 29 Kentish Town Road, is considered to be sufficiently geographically removed and screened by intervening built form the Development Site that no cumulative effects would result in relation to these topic areas. This is consistent with what is stated in the September 2011 ES. As such, the assessment of cumulative effects as reported within the September 2011 ES remain valid and applicable.

**ES Chapter 20: Summary of Residual Effects**

Given the changes made within the assessment daylight, sunlight, overshadowing, light pollution and solar glare as reported within the replacement ES Chapter (refer to Appendix A of this letter), ES Chapter 20: Summary of Residual Effects has been amended to reflect this. This work is presented within Appendix C of this letter and **supersedes** the ES Chapter 20 of the September 2011 ES.

**ES Non Technical Summary**

The ES Non-Technical Summary (NTS) has been amended to reflect the design amendments indicated previously, and the replacement ES Chapter 17: Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare as presented within Appendix A.

The replacement NTS is presented within Appendix D of this letter and **supersedes** the NTS of the September 2011 ES.

Yours sincerely



Hannah Fiszpan  
Associate Director  
For and On Behalf of Waterman Energy, Environment & Design

Enc. Appendix A - Replacement ES Volume 3: Townscape and Visual Assessment January 2012  
Appendix B - Replacement ES Chapter 17: Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare and Technical Appendices 17.1 to 17.8  
Appendix C - Replacement ES Chapter 20: Summary of Residual Effects  
Appendix D - Replacement Non-Technical Summary

cc. Mark Alper                      Stanley Sidings Ltd  
Yair Ginor                        Chelsfield Partners LLP  
Natalie Davies                 Gerald Eve LLP