

**APPENDIX 2.2:  
LONDON BOROUGH OF CAMDEN EIA  
SCOPING OPINION**

Hannah Fiszpan  
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London  
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Our Ref: 2010/4979/P  
Your Ref: 30222E-102.C.001.HF  
Please ask for: **Sara Whelan**  
Telephone: 020 7974 **5142**

9 November 2010

Dear Hannah Fiszpan,

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 on 10 September 2010, enclosing copies of the Environmental Impact Assessment Scoping Report prepared on behalf of Stanley Sidings Ltd and seeking this authority's 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.

The Screening Report is dated September 2010 and it is apparent that a number of elements of the scheme referred to in the document have already been superseded. These include:

- the apart-hotel has been replaced by residential accommodation;
- the site layout may be further revised in line with comments from the Council and the Commission for Architecture and the Built Environment (CABE);
- the servicing strategy is currently being revised;
- the Arches Open Space may change from being the main servicing area to more of a connected space with the canal;
- discussions are taking place regarding the feasibility of including a primary school within the proposal
- the existing land uses have been agreed to include light and general industrial uses (para 2.6-2.13)

The Council has not consulted residents however a copy of the EIA scoping report has been placed on the Statutory Register and an electronic copy is available on the



Councils website. The relevant statutory bodies have again been consulted; comments have been received from Natural England, British Waterways, Transport for London, Metropolitan Police Authority, Environment Agency, CABE, and English Heritage. In addition internal departments within the Council have been consulted.

As a general note the Environmental Statement should be specific to Camden Town taking into account the areas unique characteristics. It should refer to the proposed development site and wider area at all times. The following paragraphs will deal with the various chapters of the EIA scoping report.

### Potentially Sensitive Receptors

- The list at paragraph 2.13 should include
  - The Regents Canal
  - The Regents Canal walk, which is a designated Metropolitan Walk
  - Chalk Farm Road, Camden High Street, Hawley Street, Hawley Road, Kentish Town Road, Clarence Way Estate and Camden Gardens Estate
  - Any below ground structures including the LUL Northern Line tunnels running beneath Chalk Farm Road and utilities infrastructure adjacent to the north of the Regents Canal
  - Flooding risk

### Consultation

- The Consultation should include;
  - Primary Care Trust
  - London Travel Watch
  - Camden Town Unlimited
  - English Heritage GLAAS
  - Council for British Archaeology

### Transport and access

- The ES should include data on the existing and proposed pedestrian, cycle and vehicle movements in the application site and wider area and how the proposed development will cope with the anticipated increase in movement through and to the site as a destination.
- A Green Travel Plan should be provided and consideration should be given to the provision of electrical charging points within the site.
- TfL have suggested that the applicant should contact Alex Andrews (0207 126 4024) or Hannah Bishop at TfL to discuss the scope of the EIA through their pre-application service.
- The ES should address the impact on public transport and parking. This should especially deal with the peak pressures times, at weekends and peak rush hours as well as public transport running on a reduced service at night time and what impact the proposed development will have.

## Public Realm

- The ES should provide a clear approach to the function and hierarchy of the streets and spaces in the proposed development and in relation to the wider movement network.
- The ES should clearly differentiate between public and private realm and the fronts and backs of buildings including residential entrances and servicing to the employment and market.
- The landscape treatment will also be essential to define the public realm; therefore the ES should provide a full landscape proposal which includes detailed notes/designs for the whole application site (including how any future outline proposal would relate to the overall landscaping strategy).
- The ES should take account of the existing public realm on the site (including public highways) and compare this to the quality and quantity of that proposed. The comparison between the quality of the existing and proposed areas of public realm should take into account heights of buildings, sense of enclosure, daylight, sunlight, active frontages and general sense of how the spaces will compare/be used in the new proposal.
- The ES should take into account existing and proposed pedestrian/cycle flows within these existing and proposed public areas.

## Amenity

- Camden Town has a very active night-time economy. The area has been designated as a Special Licensing Policy area which has a presumption against any new licensed premises (including restaurants). The ES should consider how much of the proposal would include night time attractions and how much food/café floorspace would be provided. It should also justify this against the Special Licensing Policy area.
- The ES should take account of what impact a potentially increased night time economy would have on the function of Camden Town, the amenity of existing residents in the area and residents of the proposed units on the site. This information should include likely hours of operation and how these venues would be managed.
- Noise associated with the proposed uses should be assessed in the ES. The ES should take into account noise generated by the rooftop restaurant venue as well as other proposed noise generating premises.
- The environmental conditions of the rooftop restaurant should be considered as part of the ES.

## Day light and sunlight

- Daylight, sunlight, solar glare, ventilation and outlook shall be considered to all proposed residential and commercial units and areas of public/private amenity space and public realm.
- The impact of daylight and sunlight on nearby premises and areas of amenity space shall also be considered.

### Canal

- The application site is adjacent to the Grand Union Canal, a Metropolitan Site of Importance for Nature Conservation (SINC – ref M006). As such, the applicant should ensure that in the first instance any potential adverse effects are avoided as much as possible. If effects cannot be avoided, mitigation measures should be put in place. The ES should justify any impacts and discuss the merits of the proposed mitigation methods.
- The ES should take account of crowd pressure on the towpath around the site. Currently the site can become very busy, which makes the towpath environment crowded and uncomfortable for users, particularly around pinch points such as under Chalk Farm Road Bridge. Safety and comfort issues as a result of crowds of people on the towpath should be addressed as part of the ES.
- The ES should address the continuing function of the canal locks throughout construction and once the proposed development is completed. The ES should also assess any impacts the construction phase and the completed proposals would have on the free flowing canal traffic.
- The relationship between the proposed uses and the canal should be carefully assessed in the ES and any benefits to the canal clearly demonstrated.
- The ES should deal with any future conflicts between an intensification of use by pedestrians and existing cyclists/pedestrians. It should be demonstrated in the ES that a separation can be achieved between the cyclists and pedestrians without causing harm to the canal and biodiversity/function of the associated canal towpath.
- The ES should explore ways of how the canal can be used in a sustainable way, for example as a form of water transport or canal cooling.
- The Canal itself should be listed in paragraph 2.13 as a potentially sensitive receptor/environmental constraint.

### Surface Water Drainage and Flood risk

- The Council considers that this section will need to address the capacity of the local combined sewer network as well as the points raised in paragraph 5.68 of the scoping report.
- A surface water strategy should be carried out as part of a Flood Risk Assessment. This should demonstrate that the proposed development will not create an increased risk of flooding from surface water. The surface water

strategy should be carried out, using the SUDs hierarchy, in accordance with PPS25 and its associated practice guidance.

- The London Plan Policy 4A.14 states that the mayor's preferred standards are that developers achieve Greenfield surface water run off rates. If this can not be achieved the essential standard is a 50% reduction in post development run off rates achieved. The London Plan also states that SUDs should be utilised within a development unless there are practical reasons for not doing so. This should be included within the ES.
- The Environment Agency has also commented on the Drainage Scheme Requirements. They have stated that the surface water strategy should clearly show that;
  - Sustainable drainage techniques have been evaluated, in accordance with the SUDS management train (Circa C609).
  - Peak discharge rates from site will be reduced by 50% as a result of the proposed development, up in a 1 in 100 year storm with a suitable allowance for climate change
  - Preferred option – The mayors preferred option is for developments to achieve Greenfield runoff rates to reduce the impact of the development on the surface water drainage infrastructure.
  - Discharge volumes from site will not increase as a result of the proposed development, up to a 1 in 100 year storm with a suitable allowance for climate change
  - The site will not flood from surface water up to a 1 in 100 year storm with a suitable allowance for climate change, or that any surface water flooding can be safely contained on site up to this event.

### Community Safety/Security

- It is likely that the level of development proposed will have significant implications for the Metropolitans Police resources in seeking to ensure a safe and secure environment is created. The ES should demonstrate mitigation measures.
- It is essential that the proposal complies with the security standards detailed in the Secured by Design Scheme. This should be clearly demonstrated in the ES.
- A summary of the Crime Impact Assessment should be included in the ES.
- The ES should describe how the site would be managed as part of a Security Management Plan. This should include how many security staff would be working on the site, what shift patterns they will work on and how the security will deal with the boundaries of the site and the wider area, including a joined up approach to managing The Stables and the proposed site.
- The ES should include details of any routes to be closed at night time and how this would be managed.

- The Es should include security proposals for all uses, including a school, residential, commercial, retail and industrial.

#### Contaminated Land/ground conditions

- The ES should include a detailed scheme of assessment consisting of site reconnaissance, conceptual model, risk assessment and schedule of investigation for contaminated land. The scheme of assessment must be sufficient to assess the scale and nature of potential contamination risks on the site. The ES should also include details of the number of sample points, the sampling methodology and the type and quantity of analyses proposed.
- The documentation in the ES must comply with the standards of the *Environment Agency's Model Procedures for the Management of Contamination* (CLR11).
- The ES shall include a site investigation. The laboratory results shall be provided as numeric values in a formatted electronic spread sheet. This information will form a basis for a remediation scheme. Further details of this would be secured by condition, however the baseline studies regarding contaminated land should be included in the ES.
- The Council has commissioned ARUPs to complete a study on geology and hydrology which is anticipated to be published on 18<sup>th</sup> November 2010. The applicant should refer to this study in the ES.

#### Sustainability

- The ES should deal with cover climate change mitigation or adaption. It should address how the proposed development will deal with the emissions of climate change gases and how will it adapt to the predicted effects of climate change i.e. designed to flood, choice of materials and need for shading and planting to keep the local environment cool.
- The ES should include information of the proposed CHP and how this would link into local energy networks.
- The statement should include ways to collect and reuse water.

#### Biodiversity/Ecology

- The ES should demonstrate how the proposed development can contribute towards the Councils Biodiversity Action Plan (BAP) targets. May I suggest that you contact the Councils Nature Conservation Officer (Richard Harris 0207 974 8816) for further information.
- Para 3.21 of the Scoping Report indicates that brown and green roofs and soft landscaping elements, such as tree planting, are proposed as part of the development. Details of any proposed mitigation and enhancement measures

should be included in the ES. Including any proposed green walls and impacts upon existing trees.

- In terms of Ecology the canal is recognised as a green corridor. The ES should take account of the various levels of biodiversity on and below the water surface and what impact the construction and completed development may have.
- The ES would need to consider effects of construction beyond the site e.g. brick arches, bridges where bird and bat habitat will be present.
- A search of ecological data from the London Environmental Records Centre and appropriate statutory or non-statutory conservation organisations e.g. London Bat Group, should be carried out and the findings of this search included in the ES. These findings should feed into the design evolution.
- An up to date habitat survey (Phase 1 extended and normally in the past 12 months) should be completed so that important habitat features are identified and retained. Particular habitat niches should be included such as aquatic and marginal habitat of the proximal Regents Canal as well as epiphytes on buildings and structures. The scale and detail of the surveys should be in proportion to the size of the proposed development and likelihood of protected species using the site. The aim is to characterise important habitats and species, the presence or otherwise of protected species, and the extent that they may be affected by the proposed development. This information should be available in the ES and should inform the design and form of the development.
- The Council questions the statement that with the exception of the Grade II listed Number 1 Hawley Road, the site does not present a suitable habitat for protected species, in particular bats. Due to the presence of protected species (bats) along the canal and suitable roosting habitat within the development footprint. Therefore dawn and dusk emergence surveys should be carried out following best practice guidelines and the findings published in the ES.
- As a general point surveys must be carried out by suitably qualified and experienced persons e.g. Member of IEEM. Surveys must be carried out using recognised survey methodology and following good practice guidelines i.e. in suitable weather conditions, at an appropriate time and of appropriate duration and frequency, and at the correct period of the year.
- All survey data should be made available to the Greenspace Information for Greater London (GIGL), the London Environmental Records Centre.
- Artificial lighting has significant impacts on animals and insects, disrupting activities such as the search for food and mating behaviour. An assessment of the proposed types of lighting should be provided, aiming to keep light levels as low as possible, and timing of lighting to provide some dark periods. The Bat Conservation Trust in association with the Institution of Lighting Engineers (ILE) has produced a guidance document ['Bats and Lighting in the UK'](#) .



- The ES should provide information regarding a watching brief which should be maintained by a suitably qualified ecologist during any sensitive demolition and construction works.

### Air Quality

- The Council is satisfied with the proposed methodology and provision of information for the air quality assessment. However, the impacts of the CHP whether biomass or natural gas should also be included in the Air Quality section (5.50 – 5.51 of the ES scoping report). In addition the ES should make it clear how the food waste would be transformed into fuel quality biomass.
- The Council wishes to raise two additional matters, which should be incorporated in the ES. Firstly, a quantitative assessment of air quality effects associate with CHP and associated boilers. May I take this opportunity to advise you that the Council does not favour the use of biomass boiler or biodiesel CHP due to their potential negative impacts on air quality, preference shall be given to gas CHP.
- Secondly, the air quality section of the ES should give consideration to the potential cumulative impacts of emissions from nearby developments undergoing construction and how these will be mitigated.
- You should be aware that the Councils air quality review and assessment reports, Camden's Air Quality Action Plan 2009-12 and air pollution monitoring data can be obtained from the Councils website. These should be referred to when drafting the ES.

### Townscape and Heritage

- The ES should agree the long and short views and how they are presented as part of the application. These images and view points should be marked on a map. The final set of views should be agreed with the Council and English Heritage.
- The list of historic assets should include non designated assets such as the railway viaducts. In addition when looking at potential effects, the ES should include references to impact on settings of the various heritage assets and conservation areas.
- It is understood that the proposed development would be submitted as a hybrid application. This would comprise a full planning application and potentially an outline application for a new primary school. If this is the case a design code should be submitted with the outline application. In addition the maximum height, bulk and massing perimeters of the outline proposals should be included on the proposed views and images of the scheme.
- In terms of archaeology, the proposed assessment methodology as given in Section 5.58 of the scoping report should be in accordance with PPS 5 and current English Heritage guidelines.

- The ES should specifically refer to works proposed at no 1 Hawley Road and how the building would be bought back into use and off the English Heritage Building at Risk register.

#### Development Programme, Demolition and Construction

- The ES should also consider impacts of vibration throughout construction and should fully considered any impacts upon the existing biodiversity within the site and general amenities of the area and how impacts of vibration will be mitigated.
- The ES should take account of any bus services/vehicular routes which would need to be re-routed throughout the construction period.
- Throughout the construction phase the canal or rail network may be able to be used as a sustainable mode of transport and may help to transport demolition waste out and materials in.
- Demolition and construction waste should, as much as possible be reused on site or recycled off site.
- The ES should take account of the community safety strategy throughout construction, including the safety and natural surveillance of any temporary pedestrian routes. This may require additional way finding throughout the construction site.
- The ES should discuss how the water quality within the canal will be protected throughout the construction period. Especially in situations where you have a heavily soiled construction site which is rained upon. The ES should address how surface run off from the construction site and debris would be prevented from entering the canal and affecting its water quality?

#### Socio-economics

- The ES should assess the offer of uses and venues the proposed development would provide and how these would relate to the wider area. This may include a summary of findings from the Retail Impacts Assessment and Employment Impact Assessment. The ES should take account of the proposed development in context with Camden Town.
- The ES should assess impacts of displacing established businesses.
- It should look at the affordability of the proposed employment floorspace.
- The ES should discuss the differentiation between the tourist spaces and local spaces. How these areas would work, who they are designed for, how they would be used and who would own these spaces?
- The levels of health and amount of leisure activities available in the existing population should be considered in the ES and how this may be improved by the

proposed development. In addition health and leisure facilities for the new residents should be considered.

- Mental health, general wellness and satisfaction with the place in which existing and future residents will live should be considered in the ES.
- The local populations experience throughout the construction period should be considered.
- The ES should also take account of how the proposed residential development would integrate with the existing communities in the area. It should demonstrate how the proposed development will benefit the existing local community.

#### Cumulative effects

- This section should specifically draw out any alternatives considered.
- It should address the cumulative impacts of developments in the area and their impact upon infrastructure, pedestrian capacity, transport network and town centres.
- This section should look at the cumulative effects including completed, current and anticipated proposals in the area.

#### Proposed Structure of the ES

- Volume 4 should include;
  - Crime Impact Assessment,
  - Affordable housing statement,
  - Access statement,
  - Service Management Plan,
  - Construction Management Plan,
  - Light pollution,
  - Landscaping Strategy,
  - Socio-economic/regeneration statement,
  - PPS5 assessment (including strategic, local and longer views)

#### Other issues

- Figure 2 – The Council would advise that the southern site boundary is checked to be correct as it seems to include an access route to the south of no. 47 Kentish Town Road and areas of the towpath/lock mechanisms.

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  
Ed Watson  
Assistant Director Planning and Public Protection