

GONDAR AND AGAMEMNON RESIDENTS ASSOCIATION
c/o 28 Gondar Gardens, London, NW6 1HG

Jennifer Walsh
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London Borough of Camden
Town Hall
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by e-mail to planning@camden.gov.uk

Dear Ms Walsh,

Application 2015/0055/P – EIA Scoping Report for Gondar Gardens former reservoir site

Re: Request for Scoping Opinion under the Town and Country Planning (EIA) Regulations for the residential development at the former reservoir site, Gondar Gardens, as set out in the EIA scoping report prepared by Peter Randmall Associates.

Gondar and Agamemnon Residents' Association (GARA) has the following comments on this EIA Scoping Report:

General – the scoping report refers to up to 80 dwellings of 3-4 storey "villas" on the frontage and within the reservoir footprint, with an underground car park accessed by car lift, and arranged around a communal garden. Should the proposed scheme differ from this, for example by proposing one, two or three bedroom flats rather than "villas", or with different parking arrangements, resulting in different numbers of residents and service requirements, then an EIA based on "villas" may not be applicable or valid. We believe that the EIA should make explicit the assumptions on which it is based and therefore the limits of its validity.

Paras 2.4, 2.5 and the Applicant's agent's **covering letter** dated 18 December 2014: The covering letter refers to the focus of Schedule 4 of the 2011 Regulations being only on "significant effects". In fact, the Scoping Report (section 2.4) quotes from those Regulations, from which it is clear that impact on noise, light, creation of nuisances and other listed matters are not restricted to "significant effects". Additionally, we note that "significant effects" is a subjective term and a developer's interpretation of this must be treated with caution and scepticism.

Para 2.7 states that the scheme "amounts to a combination of previous proposals". Should the Applicant argue at a later stage that the proposed scheme is not simply a combination of previous proposals, then an EIA based on that premise would become unsound.

Further, **para 2.7** then argues that "It is therefore unlikely to introduce any new areas of potential impact". This is only valid if that is indeed shown to be the case. In particular, the combination of previous schemes may have an impact which is greater than the sum of their parts. The EIA scope should be based on the proposed scheme, not its predecessors.

Para 3.2 – the condition of the roof has been assessed as irrelevant to any application by at least one Planning Inspector.

In **para 3.7** regarding designations, the Neighbourhood Plan's proposed designation as Local Green Space, at the east end of the site, is not mentioned, even though the Plan has been examined by an Inspector.

Para 4.2 refers to access via a car lift. The Applicant has told us that they are considering a proposal which would include access roadways sloping down into the site, with junctions on Gondar Gardens. An EIA based on a car lift would not support a scheme which includes roadways.

The EIA scope proposed in para 5.1 is inadequate. There is no mention of the impact of night time light pollution on what is currently a rare "dark" site: impacts could be to neighbouring properties and to fauna.

Also in **5.1**, under "Noise", the statement that "New residents will be introduced into an area with typical urban background noise levels" ignores the current undisturbed and unusually quiet nature of the site.

Also in **5.1** there is no mention of the potential for an extended basement (such as seems likely with car lifts and an "underground car park"). We believe the impact on groundwater movement should be analysed. We assume a Basement Impact Assessment will form part of the material submitted with any application.

Para 5.3 states that in the EIA, "The main alternatives addressed during development of the proposals will be described, and the reasons for rejecting them will be given, including consideration of their environmental effects". We believe that this should include the alternative of a well-designed 'frontage-only' scheme, as well as any alternative 'front-and-centre' options. In particular, reasons should be given for rejecting potential schemes which create a nature reserve covering 93% of the Open Space and SNCI as per the previous frontage-only scheme.

In relation to **para 6.5**, we note that the Applicant carried out slow worm surveys in 2010 and 2013, finding first only a few and then a "good population" of slow worms. This indicates that any new EIA should be based on an up-to-date slow worm survey. Indeed, the Applicant's 2013 survey (28 August to 2 October 2013) recommended a further survey if development had not started within 2 years, which appears unlikely on any current timescale even in the event of permission being granted at all.

Also in relation to **6.5**, we note that GARA's proof of evidence to the 2005 UDP inquiry included a sighting of the rare spider *Tapinocyboides pygmaeus*. Whilst the importance of the species was not appreciated at the time, it has since come to our attention that this is indeed very rare. Therefore, the EIA should assess, using specifically targeted surveys, the population of *Tapinocyboides pygmaeus* and any potential impact on it.

Further, the EIA must also address what the London Wildlife Trust describes as "key biodiversity features of the site ... [which] include ... yellow meadow-ant nests that are found on the current reservoir cap".

The scoping statement is silent on how any wildlife assessment will be carried out and we are concerned that it will be limited in scope and based primarily on previous surveys. **Para 6.5, and the EIA itself, should be extended to cover all appropriate species.**

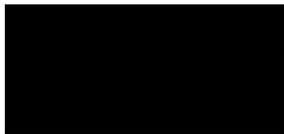
Para 6.10 and Appendix 1 covering Townscape and Views are inadequate. Six sites are identified for view analysis. These are poorly chosen and need amendment and addition. No view is selected which places the development in the context of the view from Gondar Gardens east towards Hampstead across the site. Indeed several such views might be required depending on the form of the "villas" mentioned in the document. The views to Hampstead are acknowledged in previous planning applications and by Planning Officers and Inspectors in their decisions. The views to Hampstead are referred to in the Neighbourhood Plan. These are public views of a site full of local interest, heritage assets, set among trees. In a built up area these long views are rare and precious.

The views across the site, north to south from Gondar Gardens, and south to north from Hillfield Road, are not covered. In the UDP inquiry of 2005 the Inspector held these views to be so numerous as to constitute a "considerable public asset", and this was a factor in the Inspector's decision to designate the site as Open Space. We note that proposed View 4 looks west across the site from Agamemnon Road, and this view must be paired with at least one view from the west, and at least a pair of views each from north and south, as we understand the character of the development will differ from the street frontage to the centre of the site, thus impacting north/south views in different ways. GARA would like to agree representative viewpoints and is able to help arrange access to residents' properties in order to facilitate this part of the EIA.

Para 6.11 addresses transport issues. As well as assessing trip generation, this section must also consider the impact of two additional road junctions where the proposed development would join Gondar Gardens. Further, it must consider the potential for increased parking stress caused by new residents, visitors, and delivery / service vehicles; and in doing so it should address Camden policy DP19 which states that the Borough "will resist development that would require detrimental amendment to existing or proposed Controlled Parking Zones".

We hope that our comments above will help lead to a properly scoped and informed EIA.

Yours sincerely



David Yass
Chair, Gondar and Agamemnon Residents' Association