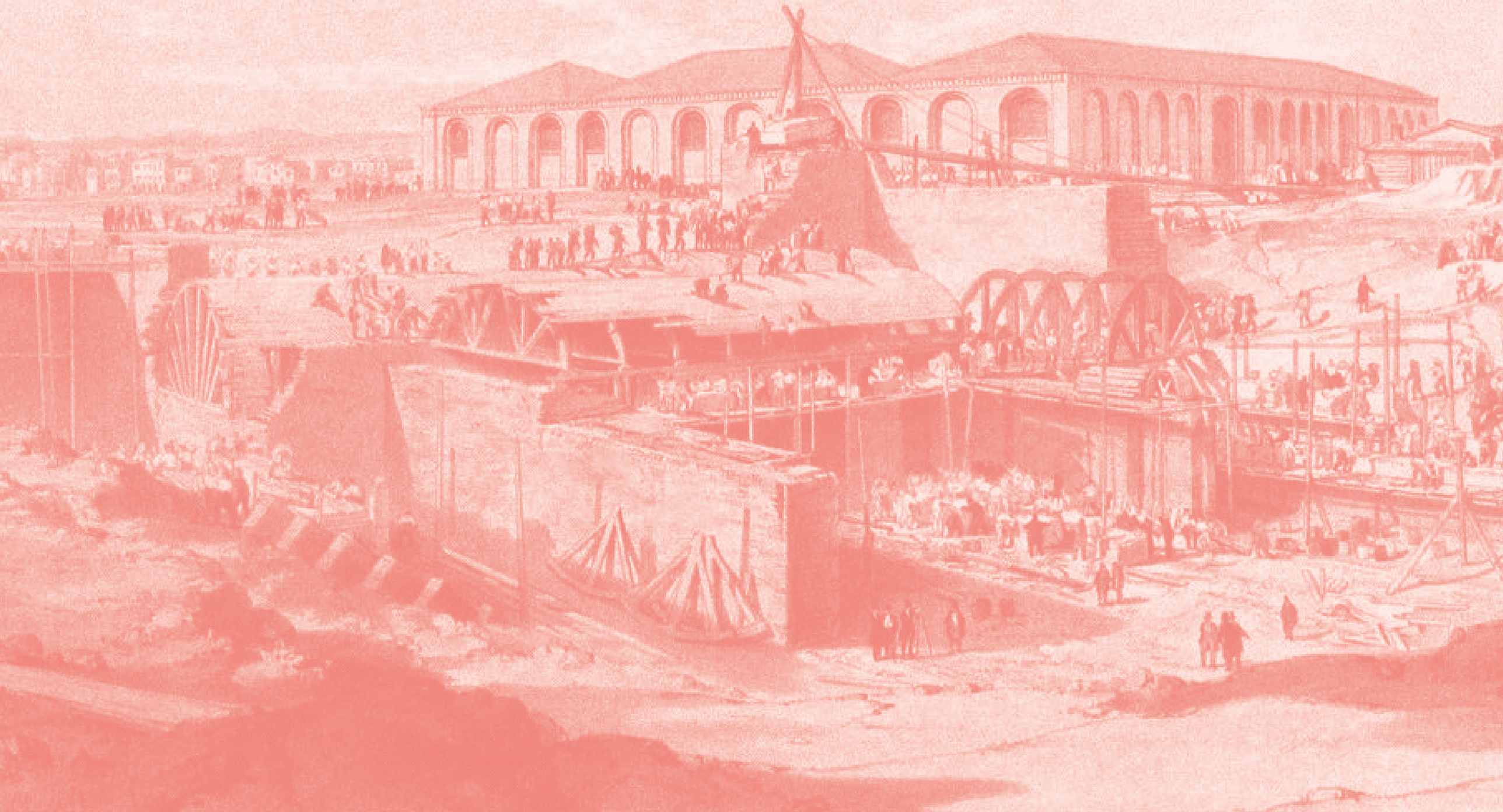
CAMDEN GOODS YARD

ENVIRONMENTAL STATEMENT

Volume 1

Main Report

30 June 2017



Volume 1: Environmental Statement Main Report
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1 INTRODUCTION

Introduction

1.1 Environmental Impact Assessment (EIA) is a process in which the likely significant effects of certain types of development projects on the environment are identified, assessed and reported upon. The process must be followed in order for such effects to be taken into account before a decision is made on whether planning permission should be granted.

1.2 This Environmental Statement (ES) has been prepared on behalf of Safeway Stores Limited and BDW Trading Limited ('the Applicant') in accordance with the statutory procedures set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, as amended in 2015[2] ('the EIA Regulations').

1.3 The EIA Regulations have since been amended and the 2017 EIA Regulations[3] came into force on 16 May 2017. Whilst the majority of amendments captured within the 2017 EIA Regulations are considered to be best practice measures and have been accounted for within this ES, as appropriate, Part 12 Regulation 76 (2a) of the 2017 EIA Regulations sets out transitional arrangements. This allows for projects scoped prior to 16 May 2017 to be undertaken under the 2011 EIA Regulations (as amended in 2015). This arrangement applies to the proposed development and the scope and format of this ES has been prepared accordingly.

1.4 The ES relates to the residential-led, mixed use redevelopment of two parcels of land off Chalk Farm Road, Chalk Farm, NW1 8AA (collectively referred to as 'the application site') located within the London Borough of Camden (LBC). These two parcels are connected by a portion of a site access road owned by Safeway Stores Limited and connecting to Chalk Farm Road. The ES accompanies a full planning application ('the application') made by the Applicant to the LBC in respect of the redevelopment proposals.

1.5 The Applicant recognises that the application falls within Schedule 2, Category 10(b) of the EIA Regulations as an 'urban development project' which, owing to its nature, scale and location, has the potential to give rise to significant effects on the environment. The Applicant has therefore commissioned an EIA for the proposed development, the findings of which are presented within this ES.

1.6 In accordance with the EIA Regulations, this ES reports on the likely significant environmental effects of the proposed development during the demolition and construction stage, as well as once the proposed development is complete and operational.

1.7 Information on how the scope of the EIA was defined, the structure of this ES, and the methodology is provided in Chapter 2: EIA Process and Methodology.

1.8 The EIA has been carried out by Ramboll Environ UK ('Ramboll Environ') and a number of technical specialists. The EIA specialists, in addition to the Applicant's wider design and planning team, are presented in Table 1.1, along with their respective disciplines.

1.9 As the local planning authority and competent authority, the LBC will determine the application taking into account the likely significant environmental effects of the proposed development as determined through the EIA process, of which this ES forms part.

1.10 The chapter is accompanied by the Institute of Environmental Management and Assessment (IEMA) Quality Mark indicator checklist, presented within Technical Appendix 1.1, ES Volume 3A.

Development Context

Application Site Location

1.11 The application site is located off Chalk Farm Road, at Ordnance Survey Grid Reference; Easting: 528397, Northing: 184129, adjacent to Juniper Crescent and Gilbeys Yard in Chalk Farm, Camden; as shown in Figure 1.1.

Figure 1.1: Application Site Location

1.12 The application site is formed of two adjoining parcels of land spatially separated by elevated railway line but connected by a portion of an access road which runs underneath the railway line. The northern parcel of the application site is occupied by a Morrisons Petrol Filling Station (PFS) and is bound by:

[1] HM Government, 2011. The Town and Country Planning (Environmental Impact Assessment) Regulations 2011. London: HMSO. SI 2011/1824.
[2] HM Government, 2015. The Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations. London: HMSO. SI 2015/660.
[3] HM Government, 2017. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. London: HMSO. SI 2017/571.

- Chalk Farm Road to the north;
- Commercial uses, including Horse Stables Market to the south-east;
- Railway lines to the south; and
- Five storey commercial uses with associated car parking to the west.

1.13 The southern parcel of the application site is occupied by a Morrisons supermarket (MS) and is bound by:

- Juniper Crescent to the north;
- Railway lines to the north-east beyond which are commercial uses, including Camden Market;
- Existing three and four storey residential uses fronting onto Gilbeys Yard to the south-east;
- Railway lines to the south-west; and
- Juniper Crescent to the north-west beyond which are existing three and four storey residential uses.

Application Site Context

1.14 As shown in Figure 1.2, the application site's surrounding context is of a mixed nature with residential use predominantly to the north, north-east, south and south-west; and commercial premises predominantly along Chalk Farm Road and Camden High Street. Camden Market, the former Horse Hospital and the Stable buildings are to the north and north-east.

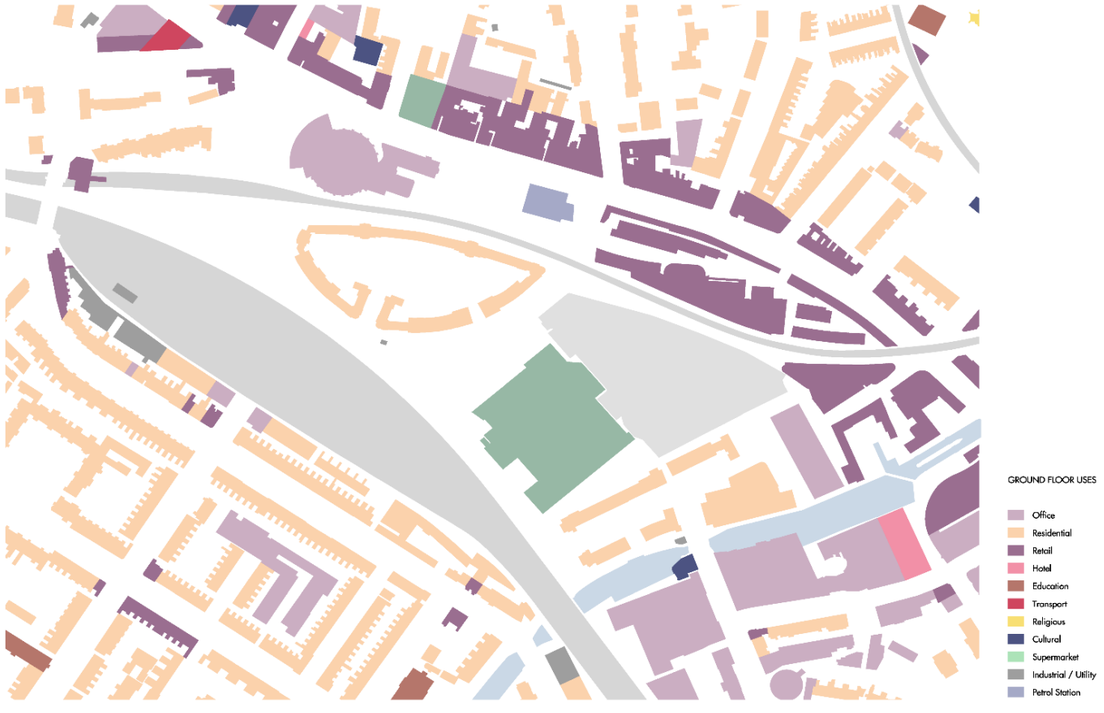

Figure 1.2: Application Site Surrounding Land Use Context

1.15 To the south-east, simple brick, three storey buildings face Camden High Street, many of which are now over-painted and decorated. Chalk Farm Road is the main thoroughfare leading north-west from Camden High Street, with the Market complex off its western side and a number of streets leading off its eastern side which are residential in character, some with two to three storey terraces dating to various periods and, on Ferdinand Street, larger, apartment blocks (approximately eight storey). Castlehaven open space is located within this area, to the south-east, which is the most significant area of public green space locally.

1.16 To the south-east is small scale, 20th century apartment blocks on Gilbeys Yard, including the Lockhouse at 35 Oval Road (approximately seven storeys in height) and larger former industrial and warehouse buildings on both sides of the Regent's Canal. The southern part of Oval Road is more residential in nature, with three and four storey Victorian terraces predominating in the area around Mornington Terrace.

1.17 The area beyond the railway lines in the south-west is characterised by gridded streets of Victorian terraces. The open spaces of Primrose Hill and Regent's Park are located further beyond to the south and south-west.

1.18 The Camden Town London Underground Station is located approximately 500 m to the east, whilst Chalk Farm London Underground Station is located approximately 400 m to the west. Both of these stations are served by the Northern line. Kentish Town West Rail Station is located approximately 600 m to the north.

Application Site Description

1.19 The application site is irregular in plan (see Figure 1.3) and occupies an area of approximately 3.26 hectares (ha) of land. The MS parcel is located in the southern extent of the application site, occupying approximately 2.86 ha of the total site area. The PFS parcel is 0.39 ha. The two parcels are spatially separated by an elevated railway line but linked by a portion of access road under the railway viaduct, this area measures 0.01 ha.

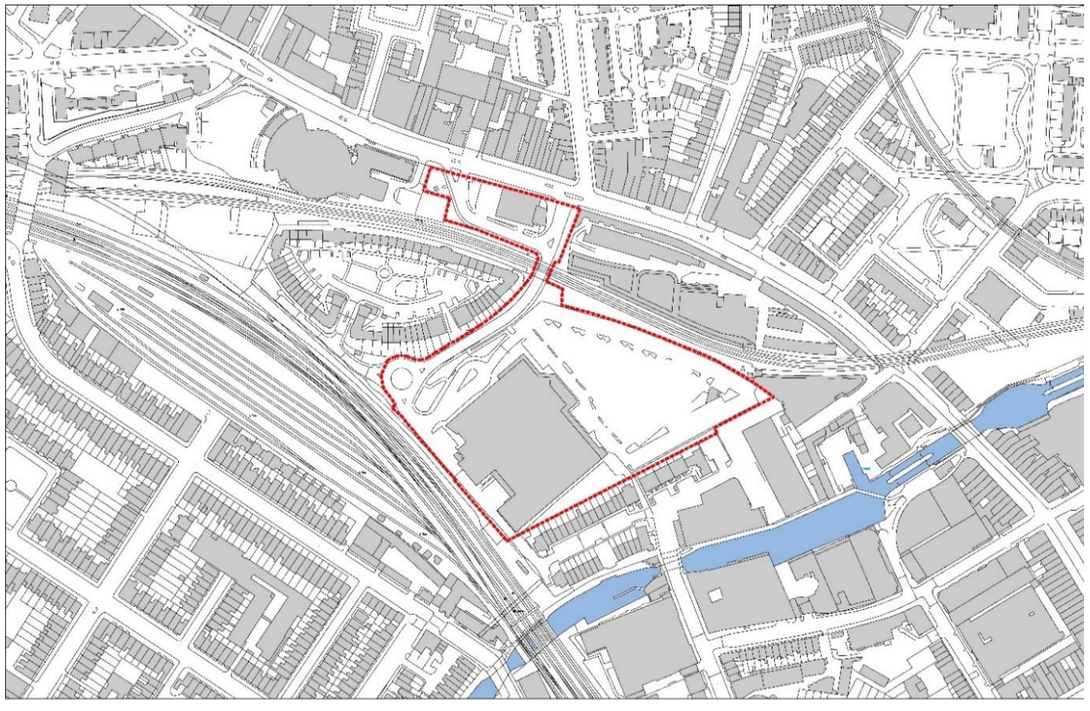

Figure 1.3: Application Site Redline Boundary

1.20 The topography of the MS parcel is relatively flat with no clearly visible dips or hills. Elevations range from approximately 32.82 m to 34.21 m Above Ordnance Datum (AOD) with a slope from the high point in the north-west to the low point in the south-east. The PFS parcel is similarly relatively flat with no clearly visible dips or hills. Elevations range from 27.33 m to 28.24 mAOD with small gradient falling from the north-west to the south-east.

1.21 The access road has an approximate elevation of 32.89 m near the roundabout which falls down to approximately 27.15m near the railway overpass. This gives an approximate fall of 6 m between the MS Parcel and the PFS parcel.

1.22 The MS parcel is occupied by the following:

- A double-height Morrisons supermarket located in the south of the parcel which includes a café, pharmacy, dry cleaners, customer toilets, bakery, butchers, fish counter, delicatessen and back-of-house areas including a warehouse, staff welfare facilities, canteen and various offices. The supermarket also includes a number of plant rooms;
- A secure concrete surfaced service yard located along the south-western frontage of the supermarket; this is accessed via an asphalt surfaced service road from the north-west;
- An area of waste storage, located in the south of the service yard including two front-loading skips, two 1,000 litre intermediate bulk containers (IBCs) of waste cooking oil, numerous wooden pallets and numerous bales of cardboard;
- A bus stop and vehicle waiting/turning area located in the north-west of the parcel, adjacent to the north-western elevation of the supermarket;
- An asphalt surfaced access road and roundabout located along the length of the north-western boundary of the parcel; and
- An asphalt surfaced car park with 425 car parking spaces in north-east of the parcel. Vehicular access to the car park is via Juniper Crescent along the north-western boundary of the parcel.

1.23 The PFS parcel is located in the north of the application site and is occupied by the following:

- A single storey kiosk building located in the east of the parcel, which includes a shop floor and back of house areas comprising an office, an electrical switch gear room, storage facilities and staff welfare facilities;
- A canopy covered concrete slab forecourt located at the centre of the parcel, which includes four fuel islands and eight fuel pumps;
- Four underground storage tanks (UST) located beneath the western extent of the forecourt and an associated UST fill point located in the eastern extent of the parcel;
- An electric compressed air pump (for inflating vehicle tyres) located in the eastern extent of the parcel, on a block paved plinth, adjacent to the northern elevation of the kiosk;
- A one-way access road off Chalk Farm Road along the eastern boundary which leads off along the southern boundary of the parcel to provide access to the PFS and back to Chalk Farm Road; and
- An unkempt portion of open space in the west of the parcel.

1.24 Representative site photographs are shown in Figure 1.4.

Environmental Considerations

1.25 This section outlines the relevant existing environmental context at, and surrounding the application site.

Socio-Economic

1.26 The existing uses at the application site accommodates approximately 85 full-time and 153 part-time, equating to approximately 161 full-time equivalent (FTE) jobs.

1.27 The prevailing land uses of the surrounding areas comprises the following:

- Residential and commercial properties to the north, beyond Chalk Farm Road and Juniper Crescent and an active rail corridor parallel to Chalk Farm Road;
- Residential and commercial properties to the north-east and east, leading to Camden Lock, Camden Market and Camden High Street;
- An active rail corridor and residential properties along Gloucester Avenue and Primrose Hill to the south; and
- Residential properties at Juniper Crescent, leading to the Roundhouse and industrial land to the west.

Photo 1: South-west view of PFS Parcel facing north

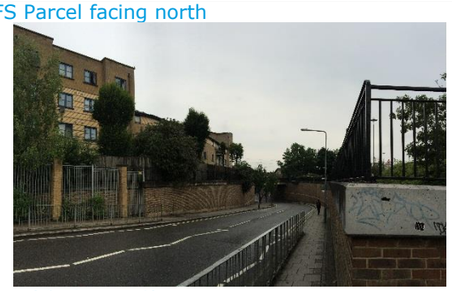

Photo 2: North view of access road facing north

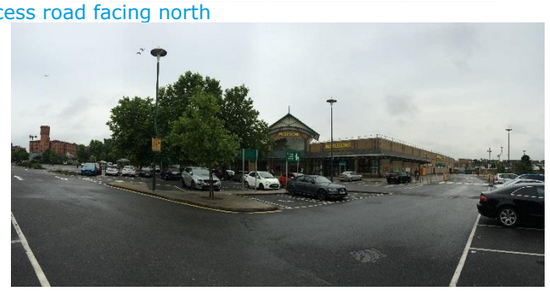

Photo 3: North-west view of MS Parcel facing south

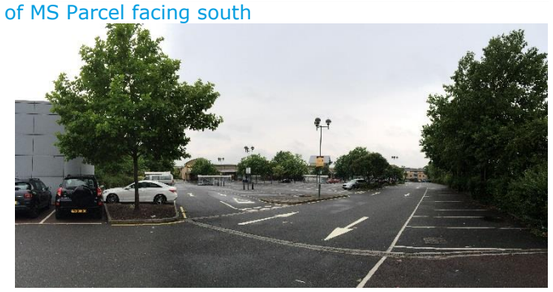

Photo 4: North-east view of MS Parcel facing west

Photo 5: South-west view of MS Parcel facing east

Figure 1.4: Application Site Photographs

1.28 The application site is located in Camden Town within the Primrose Hill ward and in close proximity to Haverstock ward. Camden Town is classified in the London Plan Town Centre designations as a major town centre and as having medium growth potential. It is also identified as a town centre and a location of growth in the draft Local Plan Submission Document (2016), given that it is a highly accessible location (Policy G1f).

1.29 The existing Camden Core Strategy[4] Policy CS7 notes that 20,000-30,000 m^2 of retail could be provided at Camden Town and Euston. It is noted that delivery of new housing will contribute to making Camden Town a 'successful and safe place' (Site Allocations Plan 2013, section 6).

1.30 Policy G1 of the Local Plan Submission Document[5] identifies that "*development will take place throughout the borough with the most significant growth expected to be delivered through*" those areas including highly accessible locations such as Camden Town. Such development must be "*consistent with the area priorities and principles set out*" in the Submission Document. This includes delivery of self-contained housing and affordable housing; supporting business and job provision by providing premises; securing the infrastructure and services needed to meet the growing number of residents, workers and visitors; and ensuring growth is delivered in a way that protects amenity. The supporting text to Policy G1 notes that developments of high density and mixed use are supported including in town centres. Camden Town is identified for a significant amount of additional shopping floorspace (Policy TC1).

Ground Conditions

1.31 According to the British Geological Survey (BGS) mapping, the application site is directly underlain by solid geology of the London Clay Formation (clay, silt and sand). The application site is further underlain by solid geology of the Lambeth Group and the Chalk Group at depth. No superficial deposits are recorded on the application site; however, given the application site's history, it is considered likely that the application site is underlain by made ground.

1.32 The London Clay Formation is classified by the Environment Agency (EA) as an Unproductive Stratum; this classification is assigned to rock units with low permeability that have negligible significance for water supply or river base flow. The London Clay confines and protects underlying aquifers. The Lambeth Group is classified by the EA as a Secondary A Aquifer comprising permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. The Chalk Formation is classified as a Principal Aquifer as it contains layers of rock that have high intergranular and/or fracture permeability - meaning they usually provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale.

1.33 Potentially contaminative historic uses of the application site have included the London and North Western Railway Camden Goods Station and associated goods shed/railway sidings, stores, warehouses and tanks which may have included the use and storage of fuels and oils.

Water Resources and Flood Risk

1.34 The nearest surface water feature is the Regent's Canal located approximately 50 m south of the southern boundary of the application site.

1.35 The nearest Environment Agency (EA) designated main river is the River Thames which is located 3.5 km to the south-east of the application site. The River Brent is located approximately 6 km to the north-west of the application site.

1.36 According to the EA, the application site is located in Flood Zone 1 (low probability). This zone comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1% in any year).

Ecology

1.37 No Sites of Special Scientific Interest (SSSIs) are located within a 2 km radius of the application site; however the study area does fall within a SSSI Impact Risk Zone for Hampstead Heath Woods which is located 2.93 km to the north-west.

1.38 Three Local Nature Reserves (LNRs) are located within the 2 km search area. The nearest is Belsize Wood which is located 1.36 km north-west of the application site.

1.39 Six non-statutory sites are located within 1 km of the application site, the nearest being the Regent's Canal (part of the London's Canals Site of Metropolitan Importance for Nature Conservation (SMINC) which is located 50 m south-east of the study area.

1.40 A Phase 1 Habitat Survey of the application site undertaken in April 2016 (see Appendix 1 of Technical Appendix 2.1, ES Volume 3A) categorised the existing habitats on-site as comprising of:

- Amenity grassland;
- Boundaries;
- Buildings;
- Hardstanding;
- Introduced shrub; and,
- Scattered trees.

1.41 The habitats on the application site are considered to be of low or negligible value for wildlife.

1.42 An Arboricultural Survey identified 20 Category A (highest retention value), 28 Category B, and 44 Category C trees on-site. The most significant trees recorded within the survey comprise a number of London Plane (*Platanus x acerifolia*) trees located along the southern boundary, as well as within the centre and in the north-west corner of the application site. All these specimens are considered to be of a high, Category A, retention value.

Archaeology

1.43 The application site partially falls within the Canalside Industry Archaeological Priority Area within the eastern corner. This is an Archaeological Priority Area due to its 19th and 20th century industrial heritage as well as below ground archaeological potential. In terms of non-designated heritage assets, the application site lies on the site of the former 19th century London and North Western Railway Camden Goods Station, which included a vaulted basement and separate contemporary Horse Stables and tunnels.

Built Heritage

1.44 The PFS parcel of the application site is located within the Regent's Canal Conservation Area. In addition, the application site is located in close proximity to a range of designated and non-designated heritage assets. These include:

- Conservation Areas (CAs): Regent's Canal, Primrose Hill, Harmood Street and Camden Town;
- Grade II* listed buildings: Horse Hospital with ramps and boundary wall, The Roundhouse and Camden Incline Winding Engine House; and
- Grade II listed buildings: Stanley Sidings, stables to the east of the bonded warehouse, The Interchange Building, Roving Bridge over the Grand Union Canal, Hampstead Road Bridge over the Grand Union Canal, Regent's Canal Information Centre, Hampstead Road Lock and Nos. 38-46 Jamestown Road and Nos. 24-28 (even) Oval Road.

[4] London Borough Camden, 2010. Camden Local Development Framework – Camden Core Strategy 2010-2015. London LBC.

[5] London Borough Camden, 2016. Draft Camden Local Plan. London. LBC.

Townscape Character and Views

1.45 Part of the application site is located within the Viewing Corridor for the Protected Vista from Assessment Point A.2, Parliament Hill: the summit – looking toward the Palace of Westminster, designated in the London View Management Framework Supplementary Planning Guidance[6] (LVMF SPG).

1.46 The application site is not located within any other regionally or locally designated views. However, due to the location of the application site, its elevated topography and the scale of the proposals, there is likely to be visibility of the proposed development within the surrounding area which includes a range of townscape character areas and a number of conservation areas and other heritage assets.

1.47 The key townscape character areas which are likely to be affected by the proposed development to different degrees are:

- Camden Lock and Market, close to the south-east of the application site;
- Chalk Farm Road, the main thoroughfare running east of the application site;
- Residential areas north-east of Chalk Farm Road, where the roads are orientated directly towards the application site and from parks, such as Castlehaven Open Space and Talacre Gardens;
- Residential areas to the north-west, around Haverstock Hill and Eton College Road, where the ground is elevated and on roads directed towards the application site;
- Primrose Hill residential area to the west, which has a formal and gridded character lined with terraces, some streets of which are directed towards the application site;
- Oval Road, south of the application site, which is a linear street directed towards the application site; it has a mixed residential character in the south and a larger scale, mixed use character towards the north;
- Primrose Hill, around the summit where long range views are available across London;
- Regent's Park, where views are likely to be very limited to a small area in the north-east; and
- Regent's Canal, from certain bridges and points on the towpath.

Transport

1.48 The application site is served by an access road extending south from Chalk Farm Road. Both parcels of land are served by this road. The access road connects to Chalk Farm Road via separate signal-controlled access and egress arrangements at either end of the PFS, with the access located at the eastern end and egress to the west.

1.49 The application site is in a highly sustainable location in terms of access by non-car modes. The average public transport accessibility level (PTAL) rating across the application site is 5 (Very Good), with the rating at specific points ranging between 2 and 6. There are two London Underground Stations (Camden Town and Chalk Farm) and a London Overground Station (Kentish Town West) located within 600 m of the application site.

Noise

1.50 Noise surveys undertaken at the application site indicate that background noise levels are dominated by transportation noise sources, in particular from passing trains and road traffic movements along Chalk Farm Road.

Air Quality

1.51 The application site is located within an Air Quality Management Area (AQMA) declared under the Environment Act 1995, which incorporates the whole of the LBC. The AQMA has been designated due to the high traffic flows within the Borough, which give rise to concentrations of pollutants nitrogen dioxide (NO_2) and fine particulates (PM_{10}) that exceed the current National Air Quality Standard objectives.

1.52 The application site falls outside the designated London Congestion Charging Zone but within the London Low Emission Zone (LEZ).

Planning Context

Planning Policy Context

1.53 It is necessary to consider the proposed development against relevant policies and guidance at national, regional and local levels. At the national level, planning policy is contained within the National Planning Policy Framework (NPPF)[7]. The majority of regional level planning policy is contained within The London Plan (2016): Spatial Development Strategy for Greater London Consolidated with Alterations Since 2011[8][9] and its relevant Supplementary Planning Guidance and Documents (SPG and SPD). Together with the London Plan (2016), the Camden Core Strategy 2010 – 2025 (2010)[10], Camden Development Policies (2010)[11] and the Camden Site Specific Allocations (2013)[12] make up the relevant Development Plan documents for the application site. In addition, the Camden Local Plan Submission Draft (2016)[13] is a material consideration and will be a Development Plan document on adoption and supersede the Development Policies document. Consideration has also been given to the emerging Camden Goods Yard Planning Framework SPD[14], as appropriate, that on adoption, will build on the policies in the Local Plan (2016) and set out the specific vision for the Camden Goods Yard Site.

1.54 Relevant planning policy context is addressed in each individual technical chapter of this ES and a full planning policy analysis is contained in the Planning Statement which accompanies this Application. It should be noted that the Camden Local Plan Submission Draft (2016) is only referred to within this ES in instances where there are significant deviations from the Development Plan.

Planning History

1.55 The existing Morrison Supermarket was constructed under a planning permission granted in 1994 (Ref. 9400778). This decision followed a successful planning appeal against a non-determination, which was granted in 1993 (Ref. 9300246), and a parallel planning application granted by the LBC in the same year (Ref.9300040).

1.56 Permissions granted in 2002 (Ref: PEX0001067), 2009 (Ref: 2009/0802/P) and 2010 (Ref: 2010/3652/P) approved *inter alia* alterations and extensions to the approved Morrison Supermarket which have all been implemented.

1.57 Planning permission granted in 2005 (ref: 2005/4882/P) approved the 'pod' exit from the Stables Market which can now be found within the Morrison Supermarket car park.

Proposed Development Summary

1.58 The proposed development as described on the planning application form comprises the following:

Demolition of existing buildings (Class A1 foodstore and Sui Generis petrol filling station) and associated highways and site works including removal of existing surface level car parking and retaining walls along with road junction alterations.

Redevelopment of petrol filling station site to include the erection of a new building of up to six storeys and up to 11,243 sq m GEA floorspace to accommodate a petrol filling station (Sui Generis), flexible Class A1, A3 and A4 floorspace, Class B1 floorspace and a winter garden; associated cycle parking;

[6] Greater London Authority, 2012. London View Management Framework Supplementary Planning Guidance. London. GLA.
[7] Department for Communities and Local Government. 2012. The National Planning Policy Framework. London. HMSO.
[8] Greater London Authority, 2016. London Plan – The Spatial Development Strategy for London Consolidated with Alterations since 2011. London. GLA.
[9] It is noted that the London Plan is currently undergoing a review process, with a draft for consultation programmed to be issued in autumn 2017, with a target to issue the final London Plan in autumn 2019.
[10] London Borough of Camden, 2010. Camden Core Strategy 2010 – 2025 (2010). London. LBC.
[11] London Borough of Camden, 2010. Camden Development Policies 2010-2025. London. LBC
[12] London Borough of Camden, 2013. Camden Site Allocations, Local Development Plan Document. London. LBC.
[13] London Borough of Camden, 2016. Local Plan Submission Draft. London. LBC.
[14] London Borough of Camden, 2017. Camden Goods Yard Planning Framework. London. LBC.

public green space; public toilets and other associated works and highways works. For a temporary period of up to thirty months part of the ground and all of the 1st floor of the building will be used for a Class A1 foodstore with associated car parking.

Redevelopment of the main supermarket site to include the erection of buildings (Blocks A to F, including Blocks E1 and E2) of up to 14 storeys accommodating up to 573 homes and up to 60,568 sq m GEA of residential floorspace together with up to 28,345 sq m GEA non-residential floorspace within Class A1 (foodstore), flexible Class A1 and A3, Class B1a and B1c, Class D2 community centre, Sui Generis use at roof level of 'Block B' for food and plant growing/production facility (including small scale brewing and distilling) with associated ancillary office, storage, education, training, café and restaurant activities; together with associated new streets and squares; hard and soft landscaping and play space; lifts; public cycle parking and cycle hire facility; and other associated works, including highways works.

1.59 The proposed development would provide:

MS Parcel (Blocks A to F)

- 573 residential units (ranging from studio to 4-bed units within private, affordable and accessible tenures) including 20 wheelchair accessible residential parking bays;
- 4,867 m^2 gross internal area (GEA) of office (B1) floorspace;
- 779 m^2 GEA workshop (B1c) floorspace;
- 565 m^2 GEA affordable workspace (B1c) floorspace;
- 19,963 m^2 GEA supermarket (A1) floorspace, including 300 parking bays and servicing space;
- 787 m^2 GEA retail (A1 and A3) floorspace;
- 86 m^2 GEA community centre (D2) floorspace;
- 1,298 m^2 GEA urban farm (*sui generis*) floorspace;
- 2,313 m^2 GEA of ancillary residential floorspace (gymnasium, concierge, community room, plant and parking) and undercroft; and
- 1,049 cycle parking bays.

PFS parcel

- 1,118 m^2 GEA petrol filling station (*sui generis*) floorspace;
- 1,627 m^2 GEA retail (A1, A3 and A4) floorspace inclusive of petrol filling station kiosk;
- 8,114 m^2 GEA office (B1) floorspace;
- 329 m^2 GEA winter garden (*sui generis*) floorspace; and
- 62 cycle parking bays.

1.60 The above uses would be provided across eight blocks ranging in height from 3 - 14 storeys.

1.61 Landscaping proposals would deliver considerable public realm and open space; including child play space; an urban farm; residential courtyards and roof gardens, amenity open space; and biodiversity enhancements.

Applicant

1.62 The Application is submitted jointly by the following entity:

Safeway Stores Limited and Barratt London (trading as BDW Trading Limited)

Project Team

1.63 The Applicant has appointed a project team. The key members of the team including their respective roles in relation to the EIA, as relevant, are presented in Table 1.1.

Table 1.1: Project Team

Company	Role
Safeway Stores Limited and BDW Trading Limited	The Applicant
Allies and Morrison	Lead Architect - Block B, C, D and F
Piercy and Co.	Architect - Block A and E
Niall McLoughlan Architects	Architect - Block G (PFS)
Turley	Planning Consultant Health Consultant Built Heritage Consultant
Ramboll Environ	EIA Project Manager and Co-ordinator Author of the non-technical chapters of the ES Contaminated Land Consultant
Ardent	Transport Consultant Noise and Vibration Consultant
GEM Air Quality Ltd.	Air Quality Consultants
BBS Environmental	Energy and Sustainability Consultant
Gillespies	Landscape Architect
Middlemarch Environmental Ltd.	Arboriculturalist
AECOM	Structural and Civil Engineers
Waterman	Mechanical and Engineering Consultant
Gordon Ingram Associates	Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution Consultant
RWDI	Wind Microclimate Consultant
CGMS	Archaeology Consultant
Tavernor	Townscape Consultant
AVR London	Accurate Verified Representations Producer

Environmental Statement

Environmental Statement Structure

1.64 The ES comprises the three technical volumes:

- Non-Technical Summary (NTS);
- Volume 1: ES Main Report, comprising the following chapters:
  - Table of Contents
  - Chapter 1: Introduction
  - Chapter 2: EIA Process and Methodology
  - Chapter 3: Alternatives and Design Evolution
  - Chapter 4: Proposed Development Description
  - Chapter 5: Demolition and Construction
  - Chapter 6: Socio-Economics
  - Chapter 7: Transport and Accessibility

  - Chapter 8: Air Quality
  - Chapter 9: Noise and Vibration
  - Chapter 10: Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution
  - Chapter 11: Wind Microclimate
  - Chapter 12: Cumulative Effects
  - Chapter 13: Residual Effects and Mitigation
  - Glossary of Terms and Abbreviations
- Volume 2A: Townscape and Visual Assessment;
- Volume 2B: Built Heritage Assessment; and
- Volume 3A: Technical Appendices:
  - Technical Appendix 1.1: IEMA Quality Mark Checklist
  - Technical Appendix 2.1: EIA Scoping Report including appendices (Preliminary Ecological Assessment and Preliminary Bat Roost Assessment, Pre-development Arboricultural Survey, Archaeological Desk Based assessment, Preliminary Risk assessment);
  - Technical Appendix 2.2: EIA Scoping Opinion;
  - Technical Appendix 2.3: Flood Risk Assessment and Surface Water Drainage Strategy;
  - Technical Appendix 9.1: Acoustic Terminology;
  - Technical Appendix 9.2: Baseline Noise and Vibration Measurements;
  - Technical Appendix 9.3: Traffic Flow Data;
  - Technical Appendix 9.4: Amenity Space Calculations;
  - Technical Appendix 9.5: Glazing Calculations;
  - Technical Appendix 9.6: Mitigation;
  - Technical Appendix 10.1: Drawings of Scenarios;
  - Technical Appendix 10.2: Daylight and Sunlight Assessment;
  - Technical Appendix 10.3: Overshadowing Assessment;
  - Technical Appendix 10.4: Solar Glare Assessment;
  - Technical Appendix 10.5: Light Pollution Assessment;
  - Technical Appendix 10.6: Internal Daylight and Sunlight Amenity Assessment;
  - Technical Appendix 11.1: Pedestrian Level Wind Microclimate Assessment; and
- Volume 3B: Transport Assessment.

1.65 The three volumes of the ES will be summarised within a Non-Technical Summary (NTS), which will outline the key findings of the EIA, presented in non-technical language to assist the reader.

Environmental Statement Content

1.66 The required content of the ES is set out in Schedule 4 of the EIA Regulations. Table 1.2 presents these requirements and indicates where in this ES the requirements have been met.

Table 1.2: Information Required in an Environmental Statement (Schedule 4 of EIA Regulations)

	Required Information	Chapter/Section of ES
PART I		
1	Description of the development, including in particular – • a description of the physical characteristics of the whole development and the land-use requirements during the construction and operational phases;	ES Chapter 4: Proposed Development Description ES Chapter 5: Demolition and Construction
	• a description of the main characteristics of the production processes, for instance, nature and quantity of the materials used; and • an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the development.	ES Chapter 8: Air Quality ES Chapter 9: Noise and Vibration
2	An outline of the main alternatives studied by the Applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects.	ES Chapter 3: Alternatives and Design Evolution
3	A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the inter-relationship between the above factors.	ES Chapters 6 - 13 of Volume 1 and ES Volume 2A and 2B
4	A description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from: • the existence of the development; • the use of natural resources; • the emission of pollutants, the creation of nuisances and the elimination of waste; and • the description by the Applicant or appellant of the forecasting methods used to assess the effects on the environment.	ES Chapters 6 - 13 of Volume 1 and ES Volume 2A and 2B
5	A description by the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.	ES Chapter 5: Demolition and Construction Mitigation sections within each technical chapter of the ES ES Chapters 6 - 13 of Volume 1 and ES Volume 2A and 2B
6	A non-technical summary of the information provided under paragraphs 1 to 5 of this Part.	NTS
7	An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the Applicant or appellant in compiling the required information.	ES Chapter 2: EIA Process and Methodology ES Chapters 6 - 13 of Volume 1 and ES Volume 2A and 2B
Part II		
1	A description of the development comprising information on the Site, design and size of development.	ES Chapter 1: Introduction ES Chapter 4: Proposed Development Description
2	A description of the measures envisaged in order to avoid, reduce, and, if possible remedy significant adverse effects.	ES Chapter 5: Demolition and Construction Mitigation sections within each technical chapter of the ES ES Chapters 6 - 13 of Volume 1 and ES Volume 2A and 2B

Table 1.2: Information Required in an Environmental Statement (Schedule 4 of EIA Regulations)		
Required Information		**Chapter/Section of ES**
3	The data required to identify and assess the main effects which the development is likely to have on the environment.	ES Chapters 6 - 13 of Volume 1 and ES Volume 2A and 2B
4	An outline of the main alternatives studied by the Applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects.	ES Chapter 3: Alternatives and Design Evolution of ES Volume 1
5	A non-technical summary of the information provided under paragraphs 1 to 4 of this Part.	NTS

Environmental Statement Good Practice

1.67 Good practice in the preparation of an ES is defined in a number of sources, with more specific issues covered by ES review checklists. In terms of widely applicable and practical guidance, the IEMA Quality Mark indicator check has been referenced in producing this ES as presented in Technical Appendix 1.1, ES Volume 3A.

1.68 Ramboll Environ UK Ltd is a Registrant of the IEMA Quality Mark.

ES Availability and Comments

1.69 CD versions of the ES are available for purchase at a cost of £25 from Ramboll Environ. Requests should be sent to the following address:

Ramboll Environ UK Ltd

Artillery House

11-19 Artillery Row

London

SW1P 1RT

1.70 Copies of the planning application and ES are also available for viewing by the public in the Planning Department of the LBC during normal office opening hours and on the LBC's online planning portal.

1.71 Comments on the planning application should be forwarded to the LBC at the following address:

London Borough of Camden

2nd Floor, 5 Pancras Square

c/o Town Hall

Judd Street

London

WC1H 9JE.

2 EIA PROCESS AND METHODOLOGY

Introduction

2.1 This chapter of the ES sets out the general approach to the EIA process and to the methodology that is adopted when undertaking an EIA. It describes the legislative framework in which the EIA for the proposed development was undertaken and describes the pre-application scoping submission and the consultation process that was adopted to identify the key environmental topics for inclusion in the EIA, as well as the overall EIA methodology adopted.

2.2 Whilst the overall approach and methodology is described in this chapter, further detail on how the methodology was tailored to each technical aspect of the EIA is presented in the relevant technical assessment chapters of the ES.

2.3 This chapter is accompanied by the following technical appendices within ES Volume 3A:

- Technical Appendix 2.1: EIA Scoping Report, including appendices (Preliminary Ecological Assessment and Bat Roost Assessment; Pre-Development Arboricultural Survey; Archaeological Desk based Assessment; and Preliminary Risk Assessment;
- Technical Appendix 2.2: LBC EIA Scoping Opinion; and
- Technical Appendix 2.3: Flood Risk Assessment (FRA).

Environmental Impact Assessment

2.4 The 2011 EU EIA Directive[1] on the assessment of the effects of certain public and private projects on the environment has been transposed into English law through the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (Statutory Instrument 2011/1824)[2] (as amended in 2015)[3] hereinafter referred to as the 'EIA Regulations'.

2.5 The 2011 EIA Directive was replaced in 2014 by a fully updated EIA Directive[4]. The 2014 EU Directive has been transposed into UK Law through the new Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (Statutory Instrument 2017/571), hereafter referred to as the '2017 EIA Regulations'. The 2017 EIA Regulations came into force on 16 May 2017.

2.6 Whilst the majority of amendments captured within the 2017 EIA Regulations are considered to be best practice measures and have been accounted for within this ES, as appropriate, Part 12 Regulation 76 (2a) of the 2017 EIA Regulations sets out transitional arrangements. This provides that for projects scoped prior to 16 May 2017, the 2011 EIA Regulations (as amended in 2015) will continue to apply. This arrangement applies to the proposed development and therefore the scope and format of this ES has been prepared in accordance with the EIA Regulations.

2.7 As set out in Chapter 1: Introduction, the EIA Regulations set out the statutory process and minimum requirements for EIA and the contents of the ES. Specifically, they prohibit the granting of planning permission for developments likely to have significant effects on the environment, defined in the EIA Regulations as 'EIA development', unless information on those effects is considered by the competent authority in reaching its decision on an application.[5] That information includes both the ES, which is the Applicant's own assessment, and any other environmental information provided by consultees, the public, and any other persons about the proposal's environmental effects.

2.8 In addition to the EIA Regulations, there is also additional guidance available on EIA and the application of the EIA Regulations, which has been considered in undertaking this EIA including:

- Institute of Environmental Management and Assessment (IEMA) Guidelines for Environmental Impact Assessment[6];
- IEMA Special Report into the State Environmental Impact Assessment Practice in the UK[7];
- Department for Communities and Local Government (DCLG) Amended Circular on Environmental Impact Assessment (consultation paper)[8];
- DCLG Environmental Impact Assessment: A guide to good practice and procedures (consultation paper)[9]; and
- DCLG Online Resource - Guidance for Environmental Impact Assessment[10];
- Department for Transport, 2008. Design Manual for Roads and Bridges Volume 11: Environmental Assessment[11];
- Institute of Environmental Assessment Guidelines for Environmental Assessment of Road Traffic[12]; and
- IEMA Shaping Quality Development[13].

EIA Process

2.9 EIA is a process that identifies the likely significant environmental effects (both beneficial and adverse) of a proposed development, both from any related demolition and construction works, and once the proposed development is complete and operational. The process aims to prevent, reduce and mitigate any adverse significant environmental effects, where these are identified. Proposed developments to which EIA is applied are those that are likely to have significant effects on the environment by virtue of factors such as their nature, size or location.

2.10 The process and outcomes of the EIA are presented in a single document known as an ES. The ES is a clear and concise report of the potential environmental effects associated with the proposed development - including direct, indirect and cumulative effects - on the natural, built and human environments as well as a description of the mitigation measures that are proposed.

2.11 An ES is submitted to a relevant competent authority (in the case of planning applications to local planning authorities) to accompany an application for planning permission. It provides the competent authority, statutory consultees and the wider community with sufficient information on the likely significant effects of a development to make an objective judgement as to that development's acceptability within the context of national, regional and local planning and environmental policy.

[1] European Union Directive 2011/92/EU.
[2] HM Government, 2011. The Town and Country Planning (Environmental Impact Assessment) Regulations 2011. London: HMSO. SI 2011/1824.
[3] HM Government, 2015. The Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations. London: HMSO. SI 2015/660.
[4] European Union Directive 2014/52/EU.
[5] EIA Regulations, Regulation 3
[6] Institute of Environmental Management and Assessment (IEMA), 2004. Guidelines for Environmental Impact Assessment. IEMA.
[7] Institute of Environmental Management and Assessment (IEMA), 2011. Special Report into the State Environmental Impact Assessment Practice in the UK
[8] Department for Communities and Local Government, 2006. Amended Circular on Environmental Impact Assessment: A consultation paper. DCLG.
[9] Department for Communities and Local Government, 2006. Environmental Impact Assessment: A guide to good practice and procedures – a consultation paper. DCLG.
[10] Department for Communities and Local Government, 2014. Guidance for Environmental Impact Assessment. DCLG.
[11] Department for Transport, 2008. Design Manual for Roads and Bridges Volume 11: Environmental Assessment.
[12] Institute for Environmental Assessment, 1994. Guidelines for Environmental Assessment of Road Traffic [Now the Institute of Environmental Management and Assessment (IEMA]
[13] Institute of Environmental Management and Assessment, November 2015. Shaping Quality Development.

EIA Screening

2.12 Screening is the term in the EIA Regulations used to describe the process by which the need for EIA is considered in respect of a development. Some developments are automatically subject to EIA by reason of their size, nature and effects. These projects, known as *"Schedule 1 developments"*, and include mainline railways, airports, waste facilities and large power stations. The proposed development is not such a project.

2.13 The need for an EIA for all other projects, referred to as 'Schedule 2 developments', is determined on the basis of the following set criteria:

- The development is within one of the classes of development stated in Schedule 2 of the EIA Regulations; AND
- Either it exceeds the size threshold for that class of development in Schedule 2; OR it is in a sensitive area; AND
- it is likely to have significant effects on the environment by virtue of factors such as its nature, size, or location.

2.14 Given the scale and nature of the proposed development and the location of the application site, it was considered by the Applicant that it has the potential to have likely significant effects on the environment and that it falls within Schedule 2 paragraph 10(b) within the category of 'Urban Development Projects'. An EIA has therefore been undertaken and the results are reported in this ES. Accordingly, a request for screening was not considered necessary.

EIA Scoping

2.15 Scoping is the term used in the EIA Regulations whereby the Applicant can request a formal opinion from the local planning authority on the content of an ES and the extent of the information to be considered in the assessments. The purpose of scoping is to focus the EIA on the environmental issues and potential impacts which need the most thorough attention; to identify those which are unlikely to need detailed study; and to provide a means to discuss methods of impact assessment so as to reach agreement on the most appropriate methodologies.

2.16 A Request for a Scoping Opinion ('Scoping Report') was submitted to the LBC on 21 November 2016 requesting advice on the scope of the EIA. The EIA Scoping Report is provided in Technical Appendix 2.1, ES Volume 3A, and sets out a description of the emerging proposed development at the time of writing; the potential key environmental impacts and likely significant effects to be considered as part of the EIA; as well as the proposed approach that would be adopted for the EIA including the proposed scope and assessment methodology to predict the scale of effects and to assess the significance in each case.

2.17 LBC issued their EIA Scoping Opinion on 16 January 2017 which is provided in Technical Appendix 2.2, ES Volume 3A. Subsequent follow-up consultation with LBC is provided within Technical Appendix 2.3.

2.18 LBC's scoping opinion comments are summarised and discussed as relevant within each technical assessment chapter and stand-alone reports of the ES. Table 2.1 summarises additional general comments that were made and how/where these have been dealt with in undertaking the EIA for the proposed development.

Table 2.1: General Comments

Technical Discipline	Consultee Comment	Where has this Comment been addressed
Construction	The CEMP shall take account of the Council's Minimum Requirements for Construction Management Plans (CMP) which are more comprehensive than the list in 6.1.1 and include concerns such as rodent control. You are strongly encouraged to incorporate the CMP pro-forma, which is available on the Council's website, into the CEMP.	A framework of the CMP that would be adopted and implanted by the Applicant is presented in ES Chapter 5: Demolition and Construction. In addition, a standalone Outline CMP accompanies the application.
	Construction Traffic Management plan: Mitigation measures must consider alternatives to just construction traffic routing and should assess in detail the potential for use of the canal and local rail for removal of construction spoil and delivery of bulk construction materials to the site. You are encouraged to investigate the impact on viability of such an approach by making it available to construction activities on other nearby committed developments.	Chapter 5: Demolition and Construction considers alternative means of demolition and construction traffic. In addition, an Outline Construction Traffic Management Plan is provided in ES Volume 3B
	It is important that the introductory, non-technical chapter which describes the proposed development's redevelopment programme and the key activities that will be undertaken during demolition and construction works for the application site contains detailed information about the phasing of delivery.	Chapter 5: Demolition and Construction provides information on the development programme, including phasing, as well as the key works and activities to be undertaken on-site. The information is proportionate to this stage of planning and design.
Climate Change - Sustainability	The scope is considered to be acceptable however we add the following comments/requirements: • The Energy Assessment should follow GLA and Camden policies and also the GLA Guidance on Preparing Energy Assessment and CPG3. • It will be required to meet the relevant policies (i.e. zero carbon for residential and 35% reduction for non-residential, with minimum of 20% reduction from onsite renewables site wide).	This is outside the scope of the ES and have been considered within the Energy Statement and Sustainable Design and Construction Statement that accompany the application.
	• Regarding reuse of demolition materials – CPG3 states that developments should follow the Demolition Protocol and implement SWMPs and provides guidance for the target % recycled/ reused materials.	Chapter 5: Demolition and Construction that the Applicant would prepare a SWMP and would target waste minimisation, re-use and recycling in accordance with the sustainability targets of the Applicant.

Table 2.1: General Comments

Technical Discipline	Consultee Comment	Where has this Comment been addressed
	• Other climate change impacts should be considered. A dynamic overheating assessment (following the CIBSE TM52 methodology in line with the GLA recommendations for current and future climate (CIBSE TM49)) should be undertaken.	An overheating assessment falls outside the scope of the ES, but has been considered within Energy Statement that accompanies the application.
Archaeology	Historic England's Archaeology Advisory service advised that *"the submitted assessment does state that further investigation would be required as part of an archaeological condition. The previous and existing developments on the site are likely to have already heavily impacted the rest of the rest of the industrial structures which did not form part of the preservation strategy in 2007. It is therefore also recommended that the applicant's archaeological contractor discuss with this office the requirements for further archaeological works as part of the application as it is not clear what purpose would be served by further investigation of what will now be badly damaged structures."* Given the extent of the excavation on site, its proximity to existing known archaeological remains of significance and the absence of further clarity about the possible presence or significance of further underground structures, we consider that the applicant's archaeological contractor should reach an agreement on the Archaeological Scoping with GLAAS, in consultation with the local planning authority, about whether further investigation, prior to submitting a planning application, would serve an archaeological purpose.	Following discussions with Laura O'Gorman (archaeology advisor to Camden) at Historic England, it was agreed with LBC that the archaeological desk based assessment submitted as part of the Scoping Report (see Appendix 2.1) would be sufficient for the application and that an ES archaeology chapter could be scoped out of the EIA.
Cumulative Effects	Section 6.11.2 of the Scoping Opinion Request identifies that only committed schemes would be considered for Inter-Project (in-combination) cumulative impacts; however no specific trigger point in time is given for the final determination of whether a development is 'committed' or not, relative to the preparation of the ES. There are additional emerging development proposals within the locality which have not been identified on the list and we consider that they should be included in scope for consideration of cumulative effects. They are:	Each technical ES chapter presents an assessment of combined effects of the proposed development with cumulative schemes. In accordance with best practice and to ensure a proportionate approach, only schemes which are considered to be reasonably foreseeable have been be considered, i.e. consented and subject to a high degree of certainty of being delivered (a resolution to grant planning consent but ideally with a signed legal agreements) schemes with planning permission or a resolution to grant, or schemes which have been submitted for approval and are specifically requested by the LBC to be assessed as a cumulative scheme, or schemes at an early stage of construction. The four additional cumulative schemes have been considered within this EIA.

Table 2.1: General Comments

Technical Discipline	Consultee Comment	Where has this Comment been addressed
	HS2 – it is understood that the current timetable for achieving Royal Assent is in Quarter 1 of 2017 1 Centric Close, NW1 7EP. (Camden ref 2016/6891/P); Marine Ices, 4-8a Haverstock Hill & 45-47 Crogsland Road (ref 2015/0487/P); and Vacant site adjacent to no 11 Crogsland Road (Camden Ref 2015/0921/P).	
Ecology	The submitted materials are considered to be comprehensive and to include all the required survey data and information of the trees on site. A full arboricultural report including an arboricultural impact assessment should be included as part of the assessment. The removal of category A or B trees may have an impact on site townscape, amenity and biodiversity. For the avoidance of doubt it should be understood that the Council requires category A and B trees to be retained where possible and to be considered material constraints on development. A total of 20 category A trees and 28 category B trees have been identified within the application site.	A separate standalone Arboricultural report accompanies the application.
Water Resources and Flood Risk	The proposed scope is accepted and it is considered that the proposed methodology has taken account of all relevant guidance but provide the following additional comments: • Greenfield run-off should be in line with London and Camden policies. Thames Water may add a specific requirement for greenfield run-off rates as the development appears to be located within the sensitive Counters Creek catchment area. • SuDS hierarchy should be followed. • Water treatment and SuDS management train will be a consideration particularly because of the number of vehicles and the petrol station. • Reference should be made to the SFRA when completing the Surface Water Drainage Statement and the SuDS pro-forma should be completed. Both can be found on the Camden website. • Surface Water Drainage Statement should include details on maintenance of SuDS.	An FRA has been prepared and is included within Technical Appendix 2.3, ES Volume 3A.

2.19 The EIA Scoping process and associated follow-up consultations have informed the content of the ES. The potentially significant environmental issues that were identified during the EIA Scoping Process and that have been addressed within this EIA are listed below:

- Demolition and Construction (Chapter 5);
- Socio Economics and Health (Chapter 6);
- Transport and Accessibility (Chapter 7);
- Air Quality (Chapter 8);
- Noise and Vibration (Chapter 9);
- Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution (Chapter 10);
- Wind Microclimate (Chapter 11);
- Cumulative Effects (individual technical chapters (6-11 of ES Volume 1, ES Volume 2A and ES Volume 2B), as well as Chapter 12);
- Townscape and Visual (ES Volume 2A); and
- Built Heritage Assessment (ES Volume 2B).

2.20 The EIA Scoping process also identified the following environmental topic areas which are not likely to give rise to significant environmental effects and therefore would not need to be assessed as part of the EIA process, as agreed with LBC:

- Archaeology;
- Ecology;
- Water Resources and Flood Risk;
- Ground Conditions;
- Light Pollution (although light pollution has been considered in ES Chapter 10: Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution, in respect of cumulative effects);
- Waste; and
- Telecommunication Interference.

2.21 Justification for scoping these topics areas out of the EIA is provided in Technical Appendix 2.1 and is therefore not repeated here. In addition, it was agreed that proposed development would be unlikely to give rise to significant climate change effects although these effects have been considered within the proposed development's FRA (Technical Appendix 2.3, ES Volume 3A) and in the standalone Energy Strategy that accompanies the application.

2.22 Whilst not required for inclusion within the EIA, due to significant effects not being likely, the following environmental technical reports were prepared to inform the design process and are included within Volume 3A of the ES:

- Preliminary Ecological Appraisal and Preliminary Bat Roost assessment – Within Technical Appendix 2.1;
- Archaeological Desk Based Assessment, and Risk Report - Within Technical Appendix 2.1;
- Flood Risk Assessment and Surface Water Drainage Strategy - Technical Appendix 2.3; and
- A standalone Arboricultural Impact Assessment that accompanies the application.

Public Engagement

2.23 During the evolution of the proposed development's design, the Applicant has carried out a detailed and thorough programme of pre-application stakeholder and community consultation, which is detailed in the statement of community involvement (SCI) that accompanies the application. The key aims of the pre-application public engagement consultation strategy were to:

- inform local residents, businesses, councillors, planning officers and other stakeholders about the regeneration aspirations for the Site;
- gain a full understanding of local views of the development proposals and context and engage with the local and wider community throughout the design development stage;
- use feedback to identify key issues, concerns and opportunities, and where possible inform the evolving proposals; and
- demonstrate how the Applicant has responded to the issues raised by the community and stakeholders and identify how changes have been made to the proposals.

2.24 The proposed development's consultation programme was designed to meet the guidelines set out by the relevant provisions of the Localism Act 2011[14] (section 122) and the NPPF.

2.25 The Applicant's approach to consultation aimed to ensure that the process was thorough, informed and inclusive. The approach comprised the following:

- Meetings with officers from the LBC Planning and other relevant departments;
- Meetings with officers from the GLA, TfL, Historic England and other statutory consultees;
- Correspondence and meetings with political representatives and local ward members, and local groups and organisations;
- Public exhibitions prior to submission of the application held on 23, 24 and 26 November 2016 and 21 and 22 April;
- A dedicated website that was maintained to provide information regarding the evolving proposals and the various stages of consultation;
- Ensuring that a wide range of residents were aware of the engagement programme and the emerging masterplan for the application site;
- Ensuring a dedicated community hotline was maintained so that members of the local community could contact the development team to enquire about future consultation activities or leave their feedback about the proposals;
- Maintaining and using an email database in relation to the proposed development from the outset; updating stakeholders on the proposed development's progress, as well as inviting stakeholders to relevant meetings and events; and
- Providing a single point of contact for correspondence and enquires.

2.26 The objectives of the consultation process sought to:

- listen to local residents' aspirations for the application site;
- inform residents about the design, planning and development process;
- communicate the proposals to politicians, the local community and key community stakeholders;
- provide a mechanism for the community to comment on the scheme and related issues;
- raise the profile of the scheme within the local community; and
- open lines of communication with residents, local businesses and organisations that will continue throughout the construction period in the event that the application is granted planning permission.

2.27 Details of the feedback from the public exhibitions and a full record of the consultation programme are provided in the SCI which accompanies the application.

2.28 Details on the technical feedback received during consultation and the EIA Scoping process relevant to the environmental assessments are presented in the relevant technical chapters of the ES.

[14] Secretary of State, 2011. Localism Act 2011. HMO.

2.29 As described in ES Chapter 3: Alternatives and Design Evolution, the proposed development has evolved through the on-going process of consultation with relevant statutory and non-statutory consultees, local stakeholders, members of the local community and LBC.

EIA Approach

Consideration of Alternatives

2.30 The EIA Regulations require that the Applicant provides an outline of any reasonable alternatives studied and to provide an indication of the reasons for selecting the preferred alternative taking into account environmental effects. The EIA Regulations do not define the term 'alternative' and good practice has tended to consider alternative design proposals and to explain the process through which the proposed development has evolved.

2.31 ES Chapter 3: Alternatives and Design Evolution explores the objectives of the proposed development and describes how the proposals have evolved in response to environmental and planning opportunities and constraints, as well as consultation comments.

2.32 The following alternatives have been considered:

- The 'Do-Nothing' alternative where the existing site condition remains predominantly cleared with no redevelopment;
- Alternatives considered in site selection; and
- Alternatives considered during the course of the design process (such as land uses, layouts and designs) taking into account environmental and other relevant planning and design constraints as part of the design evolution.

Baseline Characterisation

2.33 The purpose of the EIA is to predict how environmental conditions may change as a result of the proposed development. The assessment of the scale and significance of a predicted change is undertaken against a reference condition, known as the baseline. In most cases, the baseline represents the environmental condition of the application site and the surrounding area at the time of the assessment. However, the Transport, Air Quality and Noise and Vibration chapters also include within their assessments, a projected environmental condition in the future (e.g. future traffic flows including cumulative schemes), at 2024, which is the projected year of completion of the proposed development.

2.34 All existing buildings and structures would be demolished following the determination of the Application, as the Application seeks approval of demolition of existing buildings and the construction of the new scheme. Therefore, for all environmental topic areas the baseline for the EIA is the site condition pre-demolition.

Sensitive Receptors

2.35 Receptors that may be sensitive to potential environmental impacts as a result of the proposed development, can be summarised as follows:

- Existing users of the application site and surrounding area who would be present during the demolition and construction works and once the proposed development is completed;
- Existing residential occupants in proximity to the application site, such as those immediately to the west at Juniper Crescent and to the south at Gilbeys Yard;
- Existing commercial occupants in proximity to the application site, including Camden Market, the Roundhouse, and the establishments located along Chalk Farm Road and Camden High Street;
- Existing hotel uses in proximity to the application site, including the Camden Lock Hotel, Holiday Inn Camden Lock and the Britannia Hampstead Hotel;
- Existing community, leisure and amenity facilities in proximity to the application site, in particular local GP surgeries, dentists, educational facilities, and leisure facilities (e.g. gyms, cinemas), schools and nearby colleges;
- Existing open space facilities and amenity areas to the south-west of the application site, including Primrose Hill, Regents Park, and Castlehaven Open Space and Sports Fields to the east;
- Existing above ground heritage assets including listed buildings and conservation areas in the local area, in particular the Grade II* listed Roundhouse immediately to the west, the Grade II* listed Horse Hospital to the east of the application site and the Regents Canal and Primrose Hill Conservation Area;
- Local Air Quality;
- Existing transport infrastructure, in particular the local highway network and public transport facilities;
- Pedestrians and cyclists;
- Townscape views and townscape character areas; and
- Future residential and commercial facility occupants and users of the proposed development.

Impact Assessment

Basis of EIA

2.36 In accordance with the EIA Regulations and case law, the EIA has been undertaken based on the:

- application site as shown in Figure 1.3 and described in Chapter 1: Introduction; and
- proposed development as described in Chapter 4: Proposed Development and Chapter 5: Demolition and Construction.

2.37 An EIA has been undertaken using the proposed development's detailed planning drawings, 3D model, and area schedule.

2.38 In addition, a number of supporting documents have been considered in undertaking the EIA, including, but not limited to:

- Design and Access Statement;
- Sustainable Design and Construction Statement;
- Health Impact Assessment;
- Energy Statement;
- BREEAM Pre-assessment;
- Transport Assessment;
- Framework Travel Plan;
- Construction Management Plan;
- Servicing Management Plan;
- Arboricultural Impact Assessment;
- Statement of Community Involvement; and
- Affordable Housing Statement.

2.39 Where detailed information has not been available, reasonable assumptions have been made, and have been clearly set out, based on experience of developments of similar type and scale to enable assessment of likely significant effects.

2.40 The proposed development has not yet been approved so the conditional tense ('would') has been used to describe the development proposals, situations, potential impacts and likely effects that could/would arise from the introduction of the proposed development, as well as the mitigation measures that would be delivered or would be required upon approval of the proposed development. This approach does not

lessen the Applicants' commitment to deliver the proposed development as presented within this ES. Furthermore each technical assessment (and in particular summary tables at the conclusion of each chapter) clearly sets out the means by which any mitigation measures relied upon would be secured.

2.41 Impact assessments are undertaken for the following stages of the proposed development:

- During demolition and construction works - typically assessing the peak construction related activities and vehicle movements to represent a worst case assessment; and
- Once the proposed development is complete and operational.

2.42 It is acknowledged that the demolition and construction programme of the proposed development would be sequenced over a six year period. No significant delay (i.e. of more than 12 months) is anticipated between the development phases and therefore phased assessments have not been undertaken.

2.43 Due to the need to ensure ongoing operation of the MS on-site, the following sequencing is proposed and has been considered for the assessment of the demolition and construction stage:

- PFS parcel Enabling, Demolition, Construction of PFS Block and Fit Out for temporary supermarket use at ground floor and offices above; MS parcel fully operational;
- PFS Block operational as temporary supermarket and office use (on-site receptors); MS parcel Enabling, Demolition and Construction of Blocks A,B,C; and
- PFS Block conversion from temporary supermarket to PFS; MS parcel supermarket operational, Blocks B and C near complete with Blocks A, D, E1, E2 and F under construction.

2.44 As confirmed during the EIA Scoping process, the potential environmental impacts and likely effects of the proposed temporary supermarket have not been independently assessed in the EIA due to the temporary nature of the proposed use (approximately 2.5 years). Accordingly the temporary supermarket use have been assessed as part of the demolition and construction stage.

Assessment Methodology

2.45 Detailed methodologies for the assessment of each of the environmental topic areas scoped into the EIA are provided within each technical chapter of this ES Volume and ES Volume 2a: Townscape, Visual Impact Assessment, and Volume 2b: Built Heritage Assessment; however, in general terms, the assessments have been based upon:

- Review of the current situation at and surrounding the application site for the environmental topic area under consideration via various sources of existing information, data and reports;
- Desk-top studies;
- Site surveys;
- Consideration of relevant legislation;
- Consideration of relevant planning policies (national, regional and local);
- Consideration of potentially sensitive receptors that could be affected by the proposed development;
- Identification of potential environmental impacts and effects, with an evaluation of their likely duration, magnitude and significance, taking into consideration embedded mitigation;
- Recommendation for additional mitigation and an evaluation of the significance of the residual effects;
- Use of quantitative and qualitative assessment methods, professional judgement and expert opinion;
- Use of technical guidance and best practice; and
- Specific consultations with appropriate organisations.

2.46 The aim of the EIA is not to assess the proposed development's compliance/performance against planning policy as this is considered within the Planning Statement that will accompany the application. Instead reference is made to national, regional and local policy to inform the scope of the assessment, the assessment methodologies applied and the existence of any sensitive receptors to be considered.

2.47 Mitigation is the term used to refer to the process of avoiding where possible and, if not, minimising, controlling and/or off-setting potentially significant adverse impacts and effects of a development. Mitigation measures relate to the design stage; the demolition and construction stage; or the activities associated with the operation of the completed proposed development.

2.48 As part of the EIA, an iterative approach has been adopted where significant environmental effects have been avoided where possible in the first instance through the design refinements and iterations, as reported upon within Chapter 3: Alternatives and Design Evolution of this ES. Where adverse environmental effects were identified through early assessment work, opportunities to reduce or control impacts and effects, or in some cases, to compensate for impacts and effects, were identified and incorporated into the proposed development. In addition, opportunities to enhance the beneficial environmental effects of the proposed development have also been sought and incorporated into the proposed development. These are referred to as 'embedded' mitigation.

2.49 Within each technical chapter of this ES, the assessment of the effects that are likely to arise as a consequence of a potential impact/change to environmental receptors from the proposed development is initially presented. If any additional mitigation measures are required, further to that already embedded into the proposed development throughout its evolution, these are proposed and the proposed development is reassessed to ascertain the likely residual effects and the likely significant environmental effects. This is reported on within each technical chapter of this ES.

2.50 Unless otherwise required by published assessment guidance (e.g. air quality), the EIA has made a distinction between:

- impacts: the change or action; and
- effects: the result/consequence/outcome of the change.

2.51 A range of likely effects have been considered - including direct or indirect (or secondary), permanent or temporary; reversible and irreversible; short, medium or long term; and cumulative

- Direct effects are those which arise as a direct consequence of a project action, e.g. the loss of habitat or the run-off of surface water to a watercourse;
- Indirect effects include, for example, the decline in the abundance of a species as a result of the loss of habitat or the damage to aquatic vegetation as a result of water pollution. Other common examples include the effect on air quality and ambient noise as a result of increased traffic movements; and
- Inter and Intra cumulative effects (refer to Cumulative Effects section later in this chapter).

2.52 How the proposed development might affect the environment relies on predictions about what impact a certain action would have. Some predictions can be made using mathematical or simulation models, particularly where there are well known relationships between cause and effect. For example, the degree to which noise levels may increase as a result of additional traffic flows can be predicted using a mathematical equation. The level of air pollution from a known traffic flow can also be predicted from a computer-based simulation model. The visibility of a building can be predicted by accurately superimposing its outline and position over a photograph. Other impacts are less easy to predict in quantitative terms; for example, whilst the extent of a loss of a habitat can be measured, the effect on the abundance of individual species is more difficult to predict. In such cases, the EIA attempts to quantify the anticipated scale of impact using empirical experience, literature and professional judgement.

2.53 In all cases, the overall approach and specific methods of predicting the likely nature and scale of impact and effect is set out in each of the technical assessments. Where used, recognised specific predictive methods are referenced. Any assumptions or limitations to knowledge are stated. In either case the

thought process leading to the conclusions is based on reasonably reliable data and so is considered to be prudent and robust.

2.54 In the context of the proposed development, temporary effects would be typically those associated with the demolition and construction works, and long-term effects would typically be those associated with the completed and operational development. Typically, local effects would be those affecting receptors neighbouring the application site, whilst effects upon receptors within the wider LBC boundary are assessed at a borough level. Regional effects would be those affecting receptors within London. Effects upon different parts of the country, or England as a whole, are considered to be at a national level and effects across national boundaries would be considered at an international level (albeit there are no such effects at national or international level).

Assessment Scenarios

2.55 As noted earlier, the assessment of the proposed development has been carried out against the current baseline conditions as described in Chapter 1: Introduction and supplemented by relevant existing and updated surveys.

2.56 However, in accordance with standard practise Chapter 7: Transport and Access, Chapter 8: Air Quality and Chapter 9: Noise and Vibration considers the following scenarios:

- Scenario 1: Existing Baseline (2016);
- Scenario 2: Future Baseline (2024) which includes TEMPRO background growth;
- Scenario 3: Future Baseline (2024) + Proposed Development; and
- Scenario 5: Future Baseline (2024) + Proposed Development + Cumulative Development.

2.57 The future baseline is used to account for predicted background growth associated with transport movements on the surrounding network.

Significance

2.58 The assessment of environmental effects is important in that it informs the determination by the planning authority of the overall acceptability of the proposed development. Determining significance relies on accepted thresholds and criteria where available or, for situations in which such are not available, expert interpretations and value judgments.

2.59 Significance is usually a function of the vulnerability or importance of the resource affected (receptor) and the scale (magnitude and duration) of the potential impact. Importance might be a function of international designation or local relevance. Thus, significance is a concept that can be applied objectively to individual effects. Throughout this ES the same terminology is used to describe these individual effects, unless specific alternative terminology exists in recognised issue specific guidance, for example in ES Chapter 8: Air Quality.

2.60 Within this ES, significance has been evaluated with reference to definitive standards, accepted/published criteria and legislation, where available. Where it has not been possible to quantify likely effects, qualitative assessments have been carried out, based on expert knowledge and professional judgement. Where uncertainty exists, it has been noted in the relevant assessment and a prudent or conservative approach has been adopted so that the significance would not be under-estimated.

2.61 For transparency, specific conventions have been developed to define significance, wherever possible, using the criteria listed below:

- The sensitivity of the receptor to the change or potential impact, based on a scale of high, medium and low;
- The magnitude of the potential impact, based on a scale of high, medium, small, neutral and unknown;
- The likelihood of the effect occurring, based on a scale of certain, likely or unlikely;
- The duration of the effect, based on a scale of long, medium and short term (temporary);
- The geographical extent of the effect at local, borough, regional, national and international levels; and
- The reversibility of the effect, being either reversible or irreversible.

2.62 Unless indicated otherwise within a technical assessment the duration of the effect are defined as follows:

- Short term: up to 5 years;
- Medium term: 5-10 years: and
- Long term: 10 years +.

2.63 In order to provide a consistent approach to the presentation of the significance of effects, the following terminology has been used throughout the ES to describe the type/nature of potential and residual effects:

- **Adverse:** detrimental or negative effect to an environmental resource or receptor;
- **Neutral**: an effect that on balance, is neither beneficial nor adverse to an environmental resource or receptor; and
- **Beneficial:** advantageous or positive effect to an environmental resource or receptor.

2.64 The scale of the predicted effect has then been classified according to the following scale. The definitions of the scale used follow either that set out below, or, as specified within the individual technical ES chapters:

- **Negligible:** imperceptible effect;
- **Minor:** slight, very short or highly localised effect;
- **Moderate:** limited effect (by magnitude, duration, reversibility, value and sensitivity of receptor) which may be considered significant; and
- **Major:** considerable effect (by magnitude, duration, reversibility, value and sensitivity of receptor) which may be more than of a local significance or lead to a breach of a recognised environmental threshold, policy, legislation or standard).

2.65 There are some exceptions to this scale due to established terminology for certain topic specific assessments. For example, the Air Quality assessment uses ‘slight’ instead of ‘minor’.

2.66 In addition, ES Volume 2A: TVIA and ES Volume 2B: Built Heritage Assessment, although in broad conformity with the approach set out above, makes a clear distinction in reporting the significance of the effect and the nature of the effect. This is because the significance of an effect and the type/nature of that effect are considered by the specialist to be two separate assessments; that is, an effect may be of moderate significance and be beneficial in type/nature, but it is not the case that the effect is 'moderately beneficial'. This methodology is discussed within the TVIA and Heritage Assessment.

2.67 Throughout the ES, residual effects have been predicted as either 'significant' or 'not significant'. Significant effects are considered material to the planning decision process. Residual effects of moderate and major scale are considered significant, but would be dependent on the relevant technical assessment, as well as the existence of published assessment guidance. Where published assessment guidance is not definitive in respect of categorising/determining significant environmental effects, professional judgement would be applied, taking into account the duration, extent and context of the effect, to determine significant effects.

Cumulative Effects

2.68 The EIA Regulations require that all likely significant effects of a development are taken into account, including cumulative effects. Schedule 4 Part 1 para 4 of the EIA Regulations states that an ES should include:

2.69 *"A description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects of the development..."*

2.70 There is no prescriptive guidance on the methodology for the assessment of cumulative effects. However, the Institute of Environmental Management & Assessment (IEMA) Guidance identifies two types of cumulative effects:

- Intra-Project effects of different types of impacts from the proposed development that could interact to jointly affect particular receptors at and surrounding the application site. Potential impact interactions could include the combined effects of noise and dust during demolition and construction activities on a particular sensitive receptor; and
- Inter-Project effects which are combined effects generated from the proposed development with other committed or planned developments ('cumulative schemes'). These 'cumulative schemes' may generate their own individually insignificant effects but when considered together could amount to a significant cumulative effect, for example, combined townscape and visual impacts from two or more (proposed) developments.

Intra-Project Cumulative Effects

2.71 As mentioned, there is no established EIA methodology for assessing and quantifying the intra effects of individual effects on sensitive receptors, therefore Ramboll Environ has developed an approach which uses the defined residual effects of the proposed development to determine the potential for effect interactions and so the potential for intra effects of individual effects.

2.72 Intra-project cumulative effects from the proposed development itself on surrounding sensitive receptors during the demolition and construction works and also once the proposed development is completed has been considered. It is possible however, that depending on the predicted individual 'completed developments' effects, only the demolition and construction work effects would actually be considered as often they generate the greatest likelihood of interactions occurring and hence significant effects. Indeed, demolition and construction effects are usually more adverse (albeit on a temporary basis) than effects as a result of a completed development.

2.73 Dependent on the relevant sensitive receptors, the assessment would focus either on key individual receptors or on groups considered to be most sensitive to potential interacting effects. The criteria for identifying those receptors which are considered to be potentially sensitive would include existing land uses, proximity to the demolition and construction works and the Site, and likely duration of exposure to impacts.

2.74 It should be noted that only residual effects that are minor, moderate or major in magnitude in scale would be considered within this assessment, as negligible effects are, by definition, imperceptible in their nature. The results are presented within the ES in a discrete Cumulative Effects Assessment (CEA) chapter in a matrix table, Chapter 12: Cumulative Effects.

2.75 With regard to the potential for cumulative effects to occur, it is anticipated that standard mitigation measures as detailed in the Draft Construction Environmental Management Plan (such as dust suppression measures, use of quiet plant, restrictions on working hours) (as referred to in Chapter 5: Demolition and Construction) can be applied to prevent temporary unacceptable effects from the interaction of effects occurring on-site. It is also anticipated that the requirement for a more detailed site specific CEMP would form part of the planning conditions, as imposed by LBC.

Inter-Project Effects

2.76 Inter-project effects arising from the proposed development in combination with 'cumulative schemes' during the demolition and construction works and also once the proposed development is complete would be considered by the EIA. The EIA Regulations require an assessment of potentially significant cumulative effects of the proposed development along with other developments. There are no legislative or policy requirements which set out how a cumulative impact assessment should be undertaken.

2.77 Each technical ES chapter presents the assessment of combined effects of the proposed development with certain other cumulative schemes. Only schemes which are considered to be reasonably foreseeable have been be considered, i.e. schemes with planning permission or a resolution to grant, or schemes which have been submitted for approval and are specifically requested by LBC to be assessed as a cumulative scheme, or schemes at an early stage of construction.

2.78 Spatial considerations and scale of development criteria has been developed based on professional judgement to determine whether cumulative schemes have the potential for cumulative effects when combined with the proposed development's effects. The criteria applied to the cumulative schemes is those which are:

- located within 1 km of the redline boundary of the application site; spatially linked to the application site by means of the local road network; or visible in views to and from the application site; and
- at least 10,000 m^2 GEA in floor area or would give rise to > 150 residential units.

2.79 The list of cumulative schemes that have been considered in the EIA was agreed with the LBC as part of the EIA Scoping process. Each technical assessor has reviewed the list and has included within their individual technical assessment those cumulative schemes which have the potential for cumulative effects. Where a cumulative scheme has been excluded this has been clearly stated within each technical chapter with reasons why.

2.80 The location of each cumulative scheme is shown in Figure 2.1 and listed in Table 2.2.

Table 2.2: Cumulative Schemes

No	Application Reference	Site	Application 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.	Granted
2	2015/4774/P and 2015/4812/L	Camden Lock Market Site, Chalk Farm Road, NW1 8NH.	Granted
3	2013/5403/P	100,100a and 100b Chalk Farm Road, NW1 8EH.	Granted
4	2016/2201/P (2016/7074/P, 2016/5890/P, P2016/7089/P and 2015/1243/P)	44-44a Gloucester Avenue, NW1 8JD.	Granted 2016/7074/P : Registered
5	2016/3975/P	5-17 Haverstock Hill, NW3 2BP.	Registered
6	2016/6891/P	1 Centric Close London NW1 7EP.	Resolution to grant at committee
7	2015/0487/P	Marine Ices 4-8a Haverstock Hill & 45-47 Crogsland Road London NW3 2BL.	Granted
8	2015/0921/P	11 Crogsland Road London NW1 8HF.	Granted
9	2016/5760/P and 2016/5761/L	The Roundhouse Theatre Chalk Farm Road, NW1 8EH.	Resolution to grant at committee
10	2017/1515/P	28 Camden Wharf Jamestown Road, NW1 7BY (Ice Wharf building).	Registered

Table 2.2: Cumulative Schemes

No	Application Reference	Site	Application Status
11	2017/2155/P et al.	Various minor exterior amendments at Long Stable Stables Market Chalk Farm Road, NW1 8AH.	Registered
12	2017/1407/P (2017/0492/P and 2014/7908/P)	140-146 Camden Street, NW1 9PF	Registered
13	2015/6240/P (2015/3396/P, 2015/5160/P, 2015/3443/P, 2014/5730/P and2013/8088/P)	Camden Collection, Agar Grove Estate, Site 1, Agar Grove, NW1 0RG	Granted
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	Registered

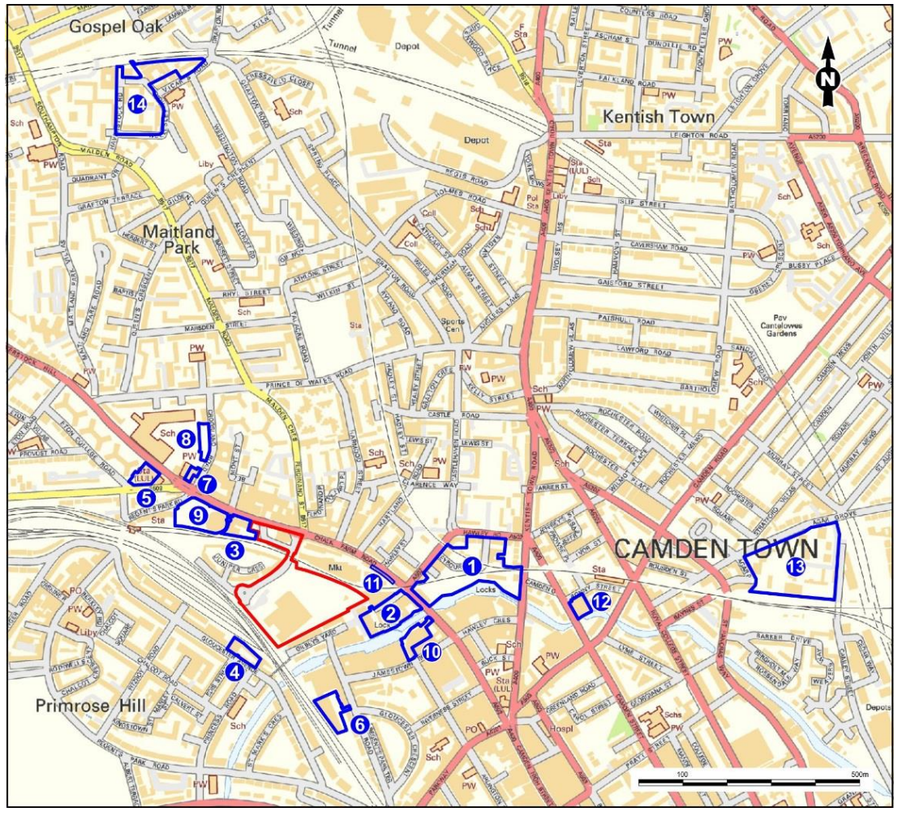

Figure 2.1: Location of Cumulative Schemes

2.81 Furthermore, in response to LBC's Scoping Opinion, where applicable, consideration in the ES has been given to the potential temporary impacts associated with the construction of High Speed 2 (HS2). Namely, consideration of construction vehicle movements; noise and vibration; and potential air quality impacts have been discussed in technical chapters 7: Transport and Accessibility, 8: Air Quality and 9: Noise and Vibration.

2.82 In considering the cumulative effects of HS2, a worst case assessment has been undertaken by assuming that impacts from this scheme would arise up to and including 2024. Accordingly HS2 cumulative effects have been considered for both the demolition and construction stage and the completed development stage.

2.83 The methodology of assessment for inter-project effects focuses on the combined effects of other development schemes together with the proposed development for all technical assessments addressed within the EIA. However, it is noted that a review of transport reports associated with the cumulative schemes confirms that, overall, there would be no significant change in traffic flows in the study area resulting from these schemes, noting that most are car-free and some would result in net traffic reductions. Consequently, the only cumulative development traffic considered in the transport, air quality and noise and vibration assessments relate to the construction of HS2.

Assumptions and Limitations

2.84 The principal assumptions that have been made, and any limitations that have been identified, in undertaking the EIA are set out below. Assumptions specifically relevant to each technical topic have been set out in each technical chapter of the ES.

- Baseline conditions have been established from a variety of sources, including historical data, but due to the dynamic nature of certain aspects of the environment, conditions at the Site and surrounding land uses may change;
- It is assumed that information received from third parties is accurate, complete and up to date;
- The application is made in full;
- In accordance with the EIA Regulations and case law, the EIA has been undertaken based on the proposed development as described in the application form, detailed planning drawings and the area schedules as described in Chapter 4: Proposed Development and the indicative information presented in Chapter 5: Demolition and Construction;
- The assessments contained within each of the ES Volume 1 technical chapters and in ES Volume 2A and 2B are based on the assumption that embedded mitigation measures set out in application drawings, through regulatory regimes or via the management controls as set out in ES Chapter 4: Proposed Development Description and ES Chapter 5: Demolition and Construction are implemented;
- The assessments contained within the ES Chapter 8: Air Quality and ES Chapter 9: Noise and Vibration are based on industry-average specifications for construction, mechanical and services plant as project-specific details would be finalised during the construction planning and procurement stages;
- Demolition and construction works across the application site would take place substantially in accordance with the programme of works described in Chapter 5: Demolition and Construction;
- Where detailed information has not been available, reasonable assumptions have been made, and have been clearly set out, based on experience of developments of similar type and scale to enable assessment of likely significant effects; and
- Consented or reasonably foreseeable cumulative schemes would be implemented substantially in accordance with information that is publicly available and subject to the same regulatory regimes and good practice management controls as this proposed development.

Technical Assessment Chapters

2.85 Each key environmental topic considered in the EIA has been assigned a separate chapter in ES Volume 1 (Chapter 6 to Chapter 12 inclusive) with the exception of the TVHIA and Built Heritage Assessment which are presented as a separate volumes (Volume 2A and 2B) of the ES. Within each technical chapter the assessment is presented and reported in the following format:

- Introduction – which provides a brief introduction to the assessment;
- Legislation and Policy Context – which provides an overview and review of policy and legislative requirements of relevance to the specific technical area;
- Consultation Feedback – a summary of the EIA Scoping Opinion and subsequent consultations undertaken and where these have been addressed in the assessment;
- Assessment Methodology – an explanation of the information gathering and assessment methodology, as well as an explanation of the approach to defining the significance of likely environmental effects;
- Baseline Conditions - a description of the baseline conditions;
- Potential Impacts and Likely Effects – an assessment of the likely significant effects of the proposed development and an evaluation of their significance against defined criteria taking into account embedded mitigation;
- Mitigation Measures and Residual Effects - a description of the additional mitigation, if required and then an assessment of the likely residual effects of the proposed development;
- Summary of Mitigation Measures and Residual Effects; and
- Cumulative Effects – an assessment of Inter-project Cumulative Effects.

2.86 In addition, ES Volume 2A undertakes a design quality review of the proposed development.

3 ALTERNATIVES AND DESIGN EVOLUTION

Introduction

3.1 The EIA Regulations require the ES to report on the main alternatives studied by the Applicant and to give an indication of the main reasons for their choice, taking into account the environmental effects. This chapter of the ES explores the objectives of the proposed development and describes how the proposals have evolved in response to the environmental and planning context within which they are being brought forward. This chapter also addresses a number of scenarios comprising:

- The Do Nothing Scenario (no redevelopment on the site);
- Alternative sites; and
- Alternative Designs.

Development Objectives and Considerations

3.2 The proposed development aims to realise the comprehensive redevelopment of the application site in order to meet the wider development aspirations set out within local and regional policies. As such the specific development objectives are to deliver:

- a vibrant mixed use and sustainable built intervention that optimises the potential of the application site and takes advantage of the central location of the application site, as well as the proximity to the Northern Line and HS2;
- high quality buildings and spaces;
- high quality new homes offering a good mix of different unit sizes and layouts, including affordable housing, that are appropriate to the local area;
- an improved retail offer;
- creation of diverse and inclusive open space and community facilities;
- high quality office and workspaces (including affordable workspaces) floorspace to accommodate a mix of tenants appropriate for the area; and
- improved permeability and accessibility across the application site.

3.3 Development considerations for the application site are set out in the following planning policy and guidance documents at national, regional and local levels:

- NPPF and PPG;
- The London Plan, 2016;
- London View Management Framework SPG, 2012;
- Camden Core Strategy, 2010;
- Camden Development Policies, 2010;
- Draft Camden Local Plan, 2015 (as appropriate given its draft status); and
- Draft Camden Goods Yard Planning Framework, 2016 (as appropriate given its draft status).

3.4 Throughout the design process, which included public consultation and pre-application engagement with the LBC, the GLA and other stakeholders, a range of issues have been identified which have influenced the final layout, height, massing, appearance and use of the proposed development.

3.5 The application site's planning history, character, as well as its immediate surrounding uses and potential future uses, planning aspirations for the application site, including the need for new high quality residential and commercial space, were all taken into account in determining the most appropriate mix of uses and massing for the proposed development.

3.6 The design process has therefore been an iterative one, as the design team has sought to respond to these issues. This has produced 'alternatives' or different ways in which the development objectives could be feasibly achieved on-site.

Opportunities

Camden Goods Yard Redevelopment Opportunity

3.7 According to Draft Camden Goods Yard Planning Framework, the application site offers a *"once in a generation opportunity to create a new mixed-use neighbourhood at the heart of the borough."* This document sets out the LBC's aspirations and visions for the application site and the wider Camden Goods Yard framework site that includes five other parcels of land, as an exciting area to create a vibrant, inclusive and distinctive new neighbourhood incorporating a mix of uses, including much needed new housing and affordable homes, small and medium enterprise workspace, office and retail floorspace.

3.8 The application site forms a large portion of the wider Camden Goods Yard site, notably the Chalk Farm Road (PFS parcel) and Morrisons (MS parcel), both of which are identified as areas for future high quality residential, office and commercial space.

3.9 The application site offers good access to public transport, ranging from PTAL 2 - 6. There are a number of bus stops situated within close proximity of the application site, most notably the bus stops/waiting area adjacent to the Morrisons supermarket. Furthermore, the application site is located in close proximity to two stations on the Northern underground line, with Camden Town Station approximately 600 m to the south-east and Chalk Farm approximately 350 m to the north-west.

Regeneration of Brownfield Site

3.10 The proposed development offers the opportunity to optimise the productive and sustainable use of a brownfield site, whilst providing much needed market and affordable housing. The application site's location also offers the opportunity to deliver a high quality urban intervention.

Environmental Constraints

3.11 Analysis of the existing application site identified a series of factors and constraints which were taken into account in the design evolution process. As such the design and layout have sought to respond to the following site constraints.

Existing Residential Receptors

3.12 Consideration was given to residential receptors at Juniper Crescent to the north-east of the application site and Gilbey's Yard to the south-east, especially in respect of daylight, sunlight, overshadowing; wind microclimate; privacy and outlook, air quality; and noise and vibration.

Existing Buried Services and Heritage Resources

3.13 The proposed development's footprint was based on an established vision for the application site that sought a masterplan approach that considered and took account of existing site constraints. The footprint of the proposed development was initially informed by underground constraints including existing on-site utilities (sewers), as well as the potential presence of underground horse stables.

3.14 Intrusive investigations were undertaken to confirm the presence and condition of the horse stables. The investigations confirmed that the horse stables had been compromised by an earlier development and therefore did not pose a constraint to the proposed development.

Existing Trees

3.15 The application site is characterised by both on and off-site trees. Whilst none of the trees are subject to a Tree Protection Order (TPO), consideration was given to minimising impacts to retained trees during the demolition and construction works, with continued measures for protection once the proposed development has been completed. In this regard, an arboricultural survey as undertaken and advice sought in respect of impact to existing trees, notably those along Chalk Farm Road and adjacent to Gilbey's Yard.

3.16 Efforts were made to reduce the impacts on trees on-site and arboricultural advice was provided in respect of the proposed development in the context of the site masterplan and approach to site levels. The site specific arboricultural impact assessment accompanies the application as a stand-alone report.

Topography

3.17 The MS parcel is relatively flat with no clearly visible dips or hills. Elevations across the MS parcel ranges from approximately 32.82 mAOD to 34.21 mAOD with a slope trending from the high point in the north-west to the low point in the south-east. The PFS parcel is relatively flat with no clearly visible dips or hills. Elevations range from 27.33 mAOD to 28.24 mAOD with a small gradient falling from the north-west to the south-east.

3.18 However, the Juniper Crescent access road has an approximate elevation of 32.89 mAOD near the roundabout which falls down to approximately 27.15 mAOD near the railway overpass. This gives an approximate fall of 6 m between the MS parcel and the PFS parcel which needed to be addressed in terms of spatial and visual connectivity of the application site.

Environmental Considerations

Play Space

3.19 Creating safe, inviting open and informal play spaces for children and families are an essential part of the proposed development, in line with the London Mayor's SPG.

3.20 Careful consideration was given to the provisioning of play areas for a range of target age groups. The location of play areas changed as the design of the proposed development evolved and input from the environmental assessments became available. Feedback received from planning officers also informed the development of the play spaces, in terms of the type of provision required, particular facilities and equipment users would like to see, and where certain areas are positioned within the proposed development.

Transport and Access

3.21 The application site benefits from good access to public transport, with a PTAL rating of 2 – 6 (average of 5). Access to the application site would be improved by creating new pedestrian and cycle routes, whilst retaining the existing bus services.

3.22 Measures to minimise transport impacts associated with the demolition and construction of the proposed development were actively explored during the design evolution process and in the preparation of a CMP. This resulted in the consideration of appropriate construction traffic routes to minimise disturbance to nearby sensitive residential receptors.

3.23 Opportunities to increase the accessibility and permeability of the supplication site to pedestrians were explored during the design process. In addition a framework travel plan was developed to promote sustainable modes of transport and safe and secure cycle storage spaces were integrated into the design of the proposed development.

Daylight, Sunlight, Overshadowing

3.24 Various height and massing options for the application site were explored during the design evolution process, taking into consideration the strategic policy requirements for the application site's redevelopment and the daylight, sunlight and overshadowing amenity of neighbouring residential receptors, including Gilbey's Yard and Juniper Crescent.

3.25 Once the overall layout of the proposed development had been confirmed, initial sunlight and overshadowing assessments were undertaken to consider impacts to the surrounding sensitive areas.

3.26 In respect of daylight to proposed on-site units, the initial studies indicated that the layout allowed for acceptable levels of daylight at ground floor amenity spaces across the application site. However, there were issues with daylight provision on some lower floors on the facades.

3.27 In response to these studies, the following amendments were made to the proposed development:

- The gardens to the rear of Block D received less than the acceptable level of daylight at ground in initial studies. This was addressed by moving the block north and away from Gilbey's Yard. This move also improved the block's proximity to Gilbey's Yard and mitigated overlooking concerns;
- The roofline of Block E1 was stepped from five to three storeys at the southern end to improve the daylight levels at street level. As did separating the taller element from the terraces;
- Block C was originally an irregular shaped courtyard block. When block D was moved away from Gilbey's Yard this reduced the footprint and compromised lighting levels. To mitigate these different typologies were explored including an atrium block with a glazed roof. The final design omitted the atrium creating two wings to the building with a gap between to maximise the envelope and improve daylight levels;
- Initially, the lower floors on Blocks F and B showed insufficient daylight through the day on the residential facades. To improve this, commercial floorspace was added to the first floor, moving the residential aspect of the building on to higher floors. Although this resulted in an increase of one storey, the change improved the level of daylight suitable for residential use, whilst improving the daylight levels on the façades at lower levels; and
- To ensure that sufficient light reached the facades on Block B facing Roundhouse Way, the roofline of Block F was stepped down.

Wind

3.28 A wind design review was undertaken during the pre-application process to inform the design evolution of the proposed development, to inform the most appropriate locations for amenity space and building entrances, as well as to highlight any areas for refinement and further development.

3.29 The initial Computational Fluid Dynamics (CFD) modelling of the proposed development and subsequent review, identified the potential for 'wind channelling' on sections around the base of Block E1, due to 'down draughts' of winds, as well as the potential for high winds at the western and south-eastern corners of the application site due to the prevailing wind.

3.30 Appropriate solutions were provided, and following wind tunnel testing modifications have been incorporated to the landscaping strategy to respond to areas where there may be marginally windier than desired conditions.

Air Quality

3.31 The proposed development would introduce a new residential population, and therefore early specialist design advice was provided to ensure that the application site is suitable for residential occupation and that residents would not be adversely affected by both existing and future air quality.

3.32 The application site is located within an AQMA declared under the Environment Act 1995, which incorporates the whole of the LBC. The AQMA has been designated due to NO_2 and PM_{10} concentrations in excess of the current National Air Quality Standard objectives.

3.33 Measures to minimise air emissions from the proposed development (such as dust and plant emissions from demolition and construction works, plant, servicing and delivery arrangements, as well as vehicle movements) were actively explored during the design evolution process and in the preparation of a CMP framework.

3.34 Furthermore, given the location of the application site within an AQMA and the nature of the proposed uses, the design evolution process considered the:

- likely effects of vehicle emissions (and means of reducing traffic emissions) and of energy centre emissions on the AQMA and sensitive receptors (existing and future); and
- ability of future residential occupiers of the proposed development to receive 'suitable clean air' with the use of appropriate ventilation systems.

Noise

3.35 As with the air quality guidance, early specialist design advice was given to ensure that the application site would be suitable for residential use and that residents would not be adversely affected by both existing and future potential noise and vibration sources.

3.36 The application site is located in an area where road traffic noise is noticeable, and adjacent to active rail lines. Baseline noise and vibration surveys were undertaken at the application site to characterise existing noise conditions.

3.37 Consideration was given to the:

- location of habitable rooms relative to facades exposed to high levels of noise to maximise acoustic separation;
- location of residential units at higher level to avoid ground level exposure to noise, as far as possible;
- location of open space and playspace relative to high levels of noise to maximise acoustic separation; and
- required glazing performance to ensure target criteria would be achieved and internal spaces would be suitable for use.

3.38 Measures to minimise noise emissions from the proposed development (such as those from demolition and construction works, plant, servicing and delivery arrangements and vehicle movements) were actively explored during the design evolution process.

Townscape, Views and Heritage

3.39 The PFS parcel of the application site is located within the Regent's Canal Conservation Area. In addition, the application site is located in close proximity to a range of designated and non-designated heritage assets. These include:

- Conservation Areas (CAs): Regent's Canal, Primrose Hill, Harmood Street and Camden Town;
- Grade II* listed buildings: Horse Hospital with ramps and boundary wall, The Roundhouse and Camden Incline Winding Engine House; and
- Grade II listed buildings: Stanley Sidings, stables to the east of the bonded warehouse, The Interchange Building, Roving Bridge over the Grand Union Canal, Hampstead Road Bridge over the Grand Union Canal, Regent's Canal Information Centre, Hampstead Road Lock and Nos. 38-46 Jamestown Road and Nos. 24-28 (even) Oval Road.

3.40 In addition, part of the application site is located within the Viewing Corridor for the Protected Vista from Assessment Point A.2, Parliament Hill: the summit – looking toward the Palace of Westminster, designated in the LVMF SPG.

3.41 The application site is not located within any other regionally or locally designated views. However, due to the location of the application site, its elevated topography and the scale of the proposals, careful consideration was given to the design proposals.

Alternatives

Do-Nothing Alternative

3.42 The 'do nothing' alternative refers to the option of leaving the application site in its current state. This option would be undesirable and inappropriate for a number of reasons including the following:

- The application site is identified within the Draft Camden Goods Yard SPD as an opportunity area to create a new mixed-use neighbourhood;
- The opportunity to provide not only office, commercial space and workspace, but also residential units to support in the LBC's housing aims, providing a mix of type and tenure (including affordable housing), would be lost; and
- The opportunity to optimise an underutilised site, enhance public accessibility and deliver significant public realm, as well as biodiversity enhancement.

Alternative Sites

3.43 No alternative sites have been considered by the Applicant for the following reasons:

- The application site is owned by the Applicant, and therefore the Applicant did not consider alternative sites which are the property of a third party;
- The application site is identified within the Draft Camden Goods Yard SPD as an opportunity area to create a new mixed-use neighbourhood;
- The Applicant is seeking to optimise the application site's potential in accordance with the NPPF and Local Policy, set out in the Development Plan; and
- The application site would provide a key development opportunity to contribute to the regeneration of an underutilised site, within a wider context of future development growth including HS2, and to provide greater and more varied offices and workspace, housing, retail and leisure opportunities.

Alternative Designs

3.44 The following sub-sections of this chapter describe the design evolution processes undertaken by the Applicant's design team. A series of site layout and built form options are presented and described along with the necessary explanations that have informed the evolution of the alternatives considered.

3.45 Taking into account policy requirements to optimise housing delivery, and benefits of mixed use development, a mixed office and residential scheme was considered the most appropriate approach. This is further explained in the planning statement accompanying the application.

Layout Options

Competition Scheme

3.46 The original design brief for the competition scheme was based on the delivery of a high-density residential led mixed-use development, comprising between 450 – 1,300 new homes. The brief also specified the requirement for a new supermarket, car parking for up to 300 vehicles, and a petrol filling station. The competition scheme is shown in Figure 3.1.

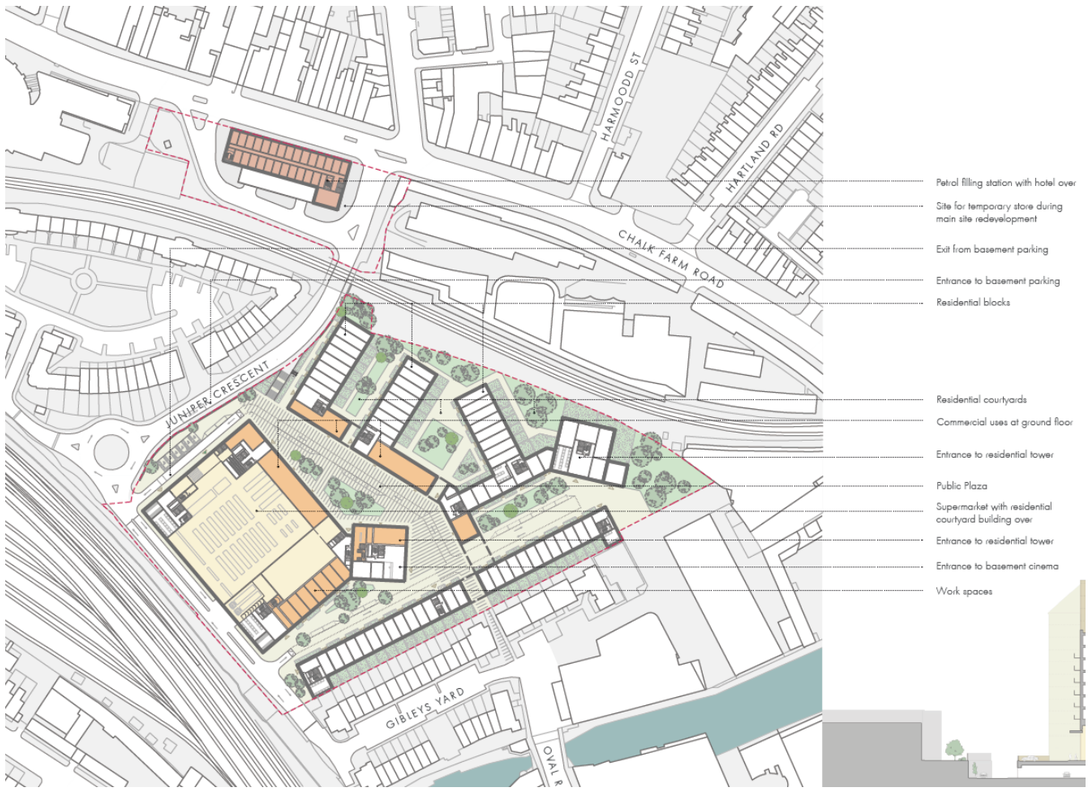

Figure 3.1: Competition Scheme Layout

3.47 In response to the brief, the competition scheme proposed the demolition of all existing buildings and the erection of buildings with heights ranging from three to 17 storeys, comprising the following:

- Petrol Filling Station, with hotel above;
- New supermarket, with additional smaller retail and commercial uses;
- Basement cinema;
- Basement parking;
- Approximately 785 residential units in a number of blocks with residential courtyards;
- Workspaces; and
- Public open space / piazza.

3.48 Upon submission of the scheme, and winning the competition, this prompted a thorough review of the application site and the wider context, which resulted in the identification of the following design issues with the submitted competition scheme:

- Commercial / retail uses located away from the main thoroughfare on Chalk Farm Road;
- Retention of existing perimeter wall created a barrier to the application site, reducing permeability; and
- The proposed layout impacted on the surrounding Regents Canal Conservation Area.

3.49 In the revaluation, environmental and physical constraints were identified, further influencing the need for a redesign, including; underground sewage pipes; historic vaults forming part of the horse hospital / stables (although as noted above, it was confirmed that these had been compromised as part of earlier development).

3.50 These findings presented opportunities to excavate further and increase the extent of the ground level to create a larger open space at the lower ground. While the location of the sewers limited how close to the northern corner the supermarket could be located, it presented the opportunity to excavate and create a new public space in front of the supermarket. This enabled the removal of the retaining wall and gained a direct level into the application site from Chalk Farm Road. The placement of the supermarket at the lower ground level also enabled the positive use of the change in levels on-site and enable more neighbourhood uses to be located at ground level.

3.51 As the project progressed following the initial competition, the design brief also developed through consultation with the general public and the LBC, to further align with the LBC's aspiration for the application site. The design brief evolved to consider the following:

- Townscape character and building heights that take account of the local townscape context;
- Reduced on-site density;
- Provision of 35 % affordable homes, including social rented London living rented and intermediate rented;
- A predominantly car-free development including 20 wheelchair accessible spaces for residents but with underground parking for store customers;
- Provision of new office floor space for local businesses;
- Provision of affordable work spaces;
- Support for small scale retail uses, new public open spaces including a children's play area;
- Provision of allotments;
- Provision of new public toilets;
- Improved access routes across the application site;
- A series of paths 'Windings' to facilitate a potential route and new entrance to the historic station Winding Vaults that sits adjacent to the application site and below the West Coast Mainline Railway; and
- Enable potential future links to Camden Lock Place.

3.52 In response to the changes in the brief, the Architects began a process of exploring design options for the application site. Although these options were important in reaching the final preferred option, they were not subject to external consultations.

MS Parcel

Option 1

3.53 The first Option focused on the MS parcel and comprised a collection of seven blocks of varying heights, centred around a central courtyard block containing the supermarket at the lower ground level.

3.54 Levels were proposed to be amended to create a civic public space in front of the store at lower ground level with a direct connection to Chalk Farm Road. The new public space navigated the change in level of 6 m with steps, lifts and ramps. The residential and mixed-use buildings at ground were primarily perimeter blocks and a hybrid of perimeter and terrace.

3.55 The taller elements of this option were located in the western and eastern corners of the application site, which as identified from the Competition Scheme, impacted on the adjacent Regents Canal Conservation Area.

3.56 Figure 3.2 shows the layout of Option 1 and Figure 3.3 shows the height and massing of the Option.

Figure 3.2: Option 1 Layout

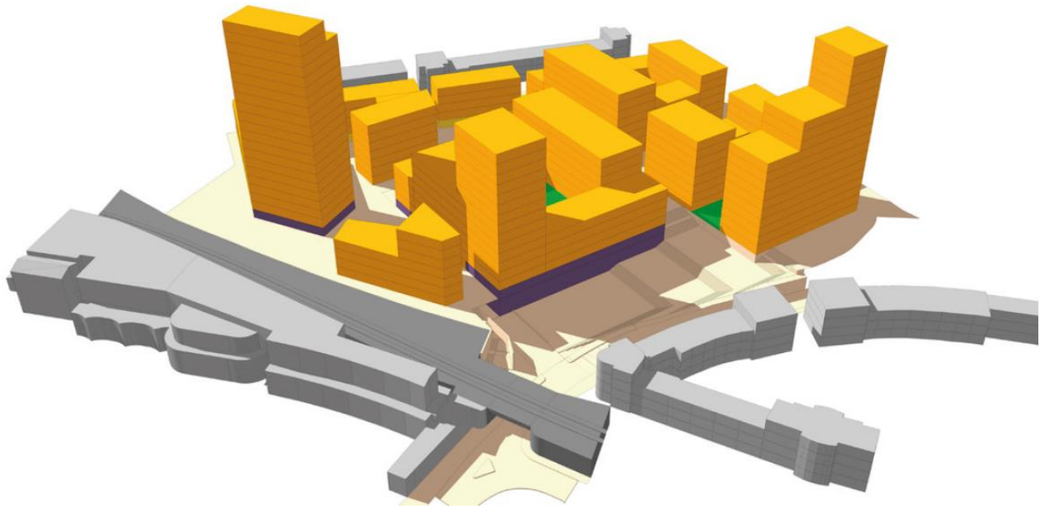

Figure 3.3: Option 1 Height and Massing

3.57 The option delivered 635 residential units on the MS parcel and 52 on the PFS parcel, within buildings ranging from 3 – 21 storeys.

3.58 Upon appraisal of Option 1, the following design and environmental issues were highlighted that resulted in the evolution of the proposals:

- The layout option created a scheme that was inwards looking;
- There was insufficient connectivity within the Option, or to the surrounding streets;
- The northern apartment building was located above the buried horse stables;
- The layout turned back on the existing interchange;
- The taller buildings were located adjacent to the railways and public spaces that could accommodate the potential overshadowing;
- The location of the higher buildings impacted on conservation areas (Regents Canal) and listed buildings (Roundhouse – Grade II*); and
- The design limited permeability as a result of tightly aligned street pattern, which lacked legibility.

Option 2

3.59 Following the appraisal of Option 1, the layout of the proposed development was altered to avoid building over the buried horst stables. This option also explored varied height and massing across the application site, and the introduction of a residential street to provide connections from east to south to Oval Road.

3.60 Connectivity was increased to the surrounding context, in particular to the public space in front of the Interchange. In addition a green public amenity space was introduced and all routes directed to a new neighbourhood square.

3.61 This Option also saw the heights of the eastern residential block reduced to respond to the nearby conservation areas and listed buildings. Furthermore, the massing and typology of the south-eastern buildings were reduced to houses to respond the existing residential dwellings at Gilbey's Yard, similarly in the western section of the application site close to Juniper Crescent.

3.62 Option 2 maintained the proposed store at lower ground level, with stepped access from the upper ground floor. Figure 3.4 shows the proposed layout of Option 2 and Figure 3.5 shows the proposed massing.

Figure 3.4: Option 2 Layout

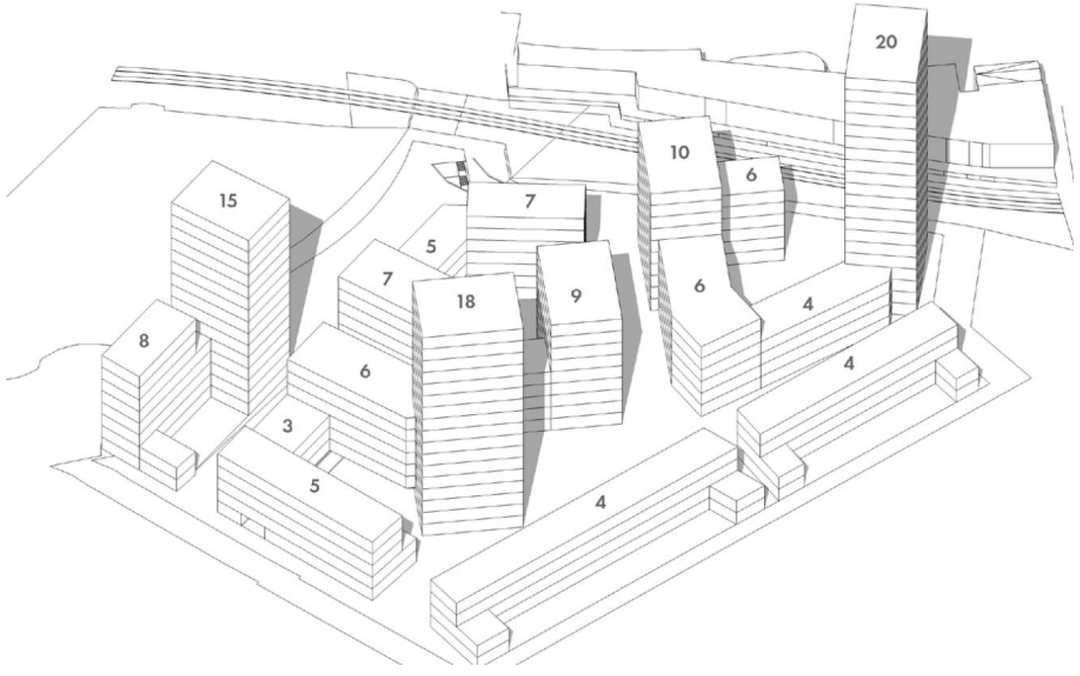

Figure 3.5: Option 2 Height and Massing

3.63 The option delivered 675 residential units on the MS site and 52 on the PFS parcel.

3.64 Building heights ranged from 3-20 storeys.

3.65 Upon review of Option 2, the proposal created complex buildings that were inefficient, creating more areas of height in sensitive locations such as the east corner.

Option 3

3.66 Option 3 evolved from the appraisal of Option 2 and was the first step in simplifying the layout of the proposed development. Attention was focused on a revised massing in keeping with the sensitive surrounding context, notably Juniper Crescent, Gilbey's Yard and nearby listed buildings. Furthermore, the public space proposed in the south of the application site was reduced, allowing more land to be utilised for public amenity space.

3.67 Figure 3.6 shows the proposed layout of Option 3 and Figure 3.7 shows the proposed massing.

3.68 The option delivered approximately 620 residential units within the MS parcel with 50 residential parking bays, along with 5,000 m^2 of office space and 1,000 m^2 of retail space.

3.69 Building heights ranged from four to 17 storeys.

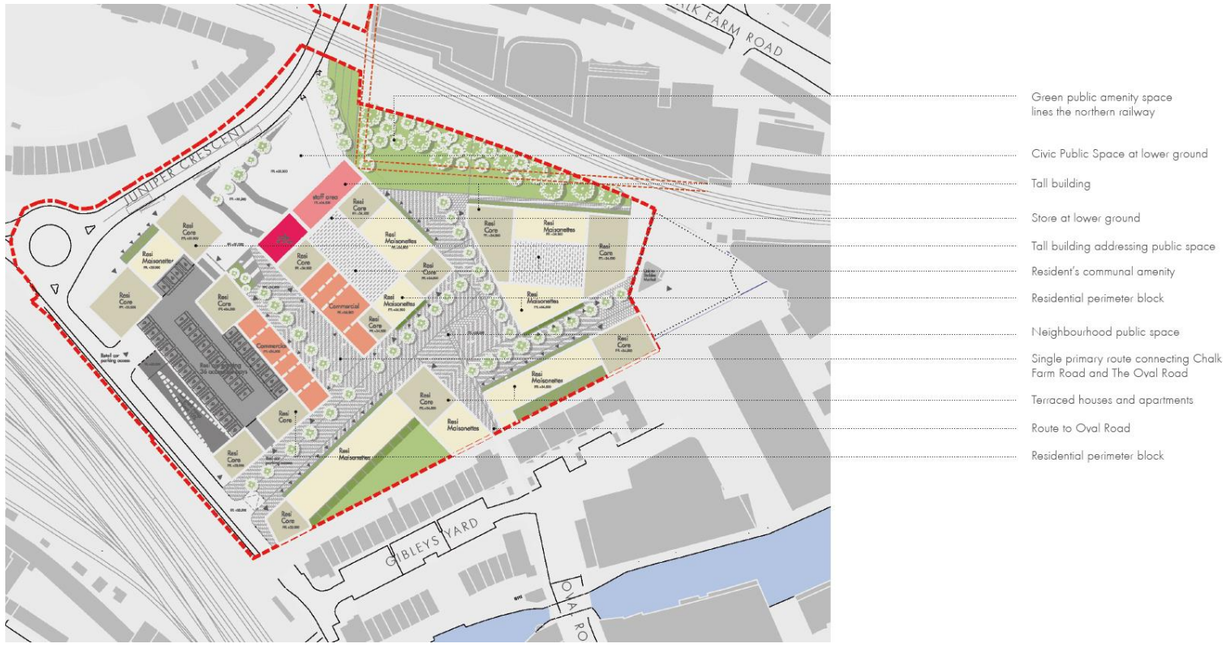

Figure 3.6: Option 3 Layout

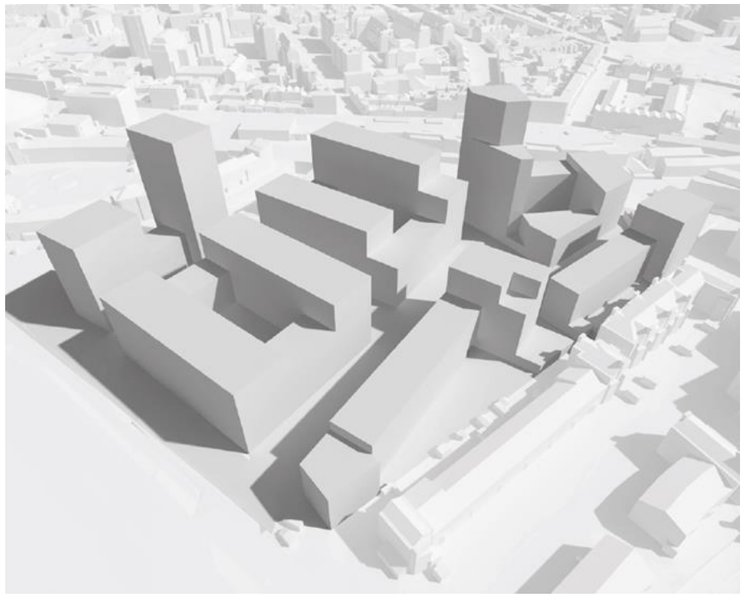

Figure 3.7: Option 3 Height and Massing

3.70 Option 3 formed the basis for the development of the final preferred option.

Preferred Option

3.71 The evolution of Option 3 into the preferred options was initiated by embodying the key aspirations identified for the proposed development to create a contextually relevant new neighbourhood suited to wider Camden.

3.72 Option 3 formed the basis of initial discussions with the LBC planning and design officers. The design aspirations included the following:

- Reduce the impact of the retaining wall along the access road;
- Improve the visibility and connections into the application site from Chalk Farm Road;
- Place the supermarket below ground to release land for the new neighbourhood;
- Improve the permeability into the application site and connections between Chalk Farm Road and Oval Road;
- Consider the railway and industrial heritage of the application site and the wider railway lands;
- Consider the listed buildings around the application site with carefully considered placement of tall buildings to minimise any harm to their setting;
- Improve the setting of the Interchange building;
- Include a range of scales and typologies in response to the existing and emerging context;
- Reduce the impression and impact of the 6 m change in level by navigating it via a series of intermediary levels;
- Introduce activity at ground floors and promote natural surveillance throughout the application site; and
- Remove the gyratory from the petrol filling station and introduce activity along Chalk Farm Road.

3.73 The first draft of the preferred option, as shown in Figure 3.8, incorporated simple building layouts that improved the streetscape of the proposed development; allowed the creation of a network of streets and open space; and the creation of a central square, connecting all aspects of the application site. Concerns were raised about the lack of a direct route through the application site to the north, via the amenity space; however this route was not introduced based on the archaeological constraints (existing buried horse stables) beneath the northern section of the application site.

Figure 3.8: Preferred Option – First Draft

3.74 Following the confirmation that the buried horse stables beneath the northern portion of the application site were no longer intact, opportunities were explored to lower the ground level in this section of the application site to allow a connection through the application site to the Stables Market; an idea that was shared with the LBC. This allowed the routes to capture views of key surrounding landmarks including the Roundhouse and to locate and orientate visitors in the neighbourhood and wider area.

3.75 The opportunity to excavate deeper also created opportunities to expand the ground level public space and incorporate access to the surrounding area, further improving connectivity within and around the application site, and reducing the impact of the topographical changes throughout the application site.

3.76 In the opportunity to introduce employment space close to the town centre without compromising the residential amenity to the south of the application site was explored and for a connection through to the market later should an agreement be reached with neighbouring land owners.

3.77 The refined option delivered 620 residential units on the MS parcel and 50 residential parking bays, along with and 5,000 m^{2x} of office space and 1,000 m^2 of retail space.

3.78 The refined building heights ranged from four to 17 storeys.

Preferred Option Amendments

3.79 The earlier options proposed heights of 2-4 storeys along the Gilbey's Yard edge in response to the existing conditions and the low rise buildings on Gilbey's Yard. Through consultation with LBC, concerns were voiced that although the heights were in context with the surroundings, they would limit the future development opportunity should Gilbey's Yard be subject to redevelopment.

3.80 Accordingly, in response, Blocks D and E were repositioned further away from Gilbey's Yard, to the north. The massing of these blocks was increased to optimise the number of proposed residential units.

3.81 Further amendments to the preferred option were made following concerns raised in relation to the linear park in the north of the application site. The position of Block C was altered to widen the connection between the square in front of the interchange and the linear park, as shown in Figure 3.9.

Figure 3.9: Realignment of Block C

3.82 Furthermore building heights and massing were reviewed more generally across the application site to reduce daylight, sunlight and overshadowing impacts, as well as townscape and visual impacts.

3.83 The finalised preferred option delivered 573 residential units, supported by a mix of office, retail and community uses.

3.84 Building heights ranged from three to 14 storeys.

PFS Parcel

3.85 Due to the constraint spatial extent of the PFS parcel it was not possible to explore a wide range of layout options.

Option 1

3.86 The first building option for the PFS parcel was eight storeys in height and included a hotel on the upper storeys, with the petrol station remaining at ground level. It was then proposed that residential uses be incorporated into the Block to provide a mix of hotel accommodation and residential uses within a stepped Block, separating the two elements. Within the same iteration, a kiosk servicing the petrol station was proposed.

3.87 This option introduced a two-way junction on the corner of Chalk Farm Road to reduce traffic exiting the new neighbourhood from the petrol filling station. It retained and relocated one of the existing gyratory exits for access about the Petrol Filling Station.

3.88 The option delivered 50 residential units; however due to the space and height constraints, this option was unable to accommodate the additional residential facilities and amenities required for the residential units, and therefore the design was discounted.

Option 2

3.89 Following the review of Option 1, the PFS parcel was redesigned based on a change to the design brief, and the potential to use the PFS as the location for the temporary supermarket whilst the construction of the MS parcel was underway. The brief was updated to include:

- Retention of the PFS function;
- Preferred location for the temporary supermarket;
- Optimise the number of residential units; and
- Improve the junction and pedestrian experience along Chalk Farm Road.

3.90 Option 2 proposed the PFS be located at ground floor level with levels above, accommodating the temporary supermarket in the first instance, before being replaced with office space in the long term. In the long term, this option proposed 52 residential units, including 12 duplex apartments and the introduction of retail units at ground level along Chalk Farm Road.

3.91 The residential units were proposed over four floors, stepped back from the south-western edge of the PFS parcel. A review of this option identified a number of technical constraints and complications relating to placing residential units above a petrol filling station**.**

Option 3

3.92 This option proposed 8,000 m^2 of office space instead of residential uses, located within five storeys above the PFS. Retail units were proposed at ground level, following the cessation of the temporary supermarket use, accessible from Chalk Farm Road. The option maintained the same brief as option 2 and a height of 6 storeys was proposed.

3.93 Following discussions with the LBC planners on the proposals, concerns were raised in relation to the height and massing of the option in comparison to the existing single storey retail units on the opposite side of Chalk Farm Road, prompting further design alterations. Similarly, concerns were raised during public consultation regarding the volumes of traffic during large events at the Roundhouse, and the capacity of the PFS, leading to the conception of the preferred option.

Preferred Option

3.94 The preferred option considered the concerns raised during both consultation with the planners and from the public consultation in relation to proposed heights, and the layout / capacity of the PFS. In response, the height of the PFS was maintained at 6 storeys

Heights and Massing Options

3.95 Throughout the evolution of the height and massing of the proposed development, careful consideration was given to the wider surroundings, including the overshadowing impact on neighbouring properties and amenity space, the surrounding conservation areas and listed buildings, and the location of the application site within the Primrose Hill to Parliament Square viewing corridor.

3.96 In response to these environmental considerations and constraints, as well as through consultation with LBC, the emerging proposals were subject to a number of height and massing options as shown in Figure 3.3, 3.5 and 3.7.

3.97 Options 1-3, in conjunction with the competition brief, included buildings ranging in height from 3 – 20 storeys; however it was noted that the heights and proposed layout of the proposals raised concerns amongst the LBC officers and community regarding potential impacts to heritage assets.

3.98 Following the first draft of the preferred option and from discussions with the LBC officers, the height of the proposals were refined to account for the relationship of taller elements with heritage assets, within sensitive views and the overshadowing impacts on neighbouring residential properties and public open space. As a result, the following changes were made:

- The taller element (13 storeys) on the corner of Block B was reduced; and
- Height was removed from the eastern corner of Block F on Southampton Square where it was considered to have an overbearing impact on the public space.

3.99 In the view of the officers at LBC, ground plus seven storeys, from the Oval Road Level, was an acceptable prevailing height across the application site.

3.100 Accordingly, further height and massing studies were undertaken for Block A, C and E2.

3.101 In summary, considering the environmental constraints and comments from the LBC, the following evolution of heights occurred:

- Block A: two towers elements reduced from 17 and 12 storeys to 14 and 11;
- Block B: reduced to seven storeys, dropping to five storeys adjacent to Southampton Square;
- Block F: revised to eight storeys, a stepped articulation was introduced and height was reduced in the south-western corner to increase sunlight in the courtyard;
- Block F: central building on the east elevation which is close to Roundhouse Way was reduced in height to increase the light within Roundhouse Way and to Block B opposite; and the central building of Block F was increased in height by two storeys;
- Block C: one storey was removed, reducing the height to nine storeys;
- Block D: in response to the LBC concerns with the future development at Gilbey's Yard, Block D was increased by one storey from four to five storeys; and
- Block E1 was reduced in height from 14 storeys to 10 storeys, and the stepped profile was removed to create a single building of 10 storeys.

Façade Options

MS Parcel

3.102 The overall architectural character of the proposed development draws influences from the Railway, Warehouses and Industrial buildings of and surrounding the application site and associated with Camden as a Railway town. As such, the use of other materials was not considered during the design process to

ensure the proposed development respected the heritage and existing townscape of the surrounding area.

3.103 The preferred façade option, as shown in Figure 3.11 – 3.16, comprises the following:

- Brick facades and masonry; and
- Precast and metalwork.

PFS Parcel

3.104 For the petrol filling station site, brick would be used at ground level. Due to its prominent location on the high street and at the entrance to the application site the upper levels would comprise timber and glass.

Pre-Application Consultation

3.105 An extensive programme of pre-application submission consultation was undertaken during the design evolution of the proposed development. A more detailed explanation of the consultation approach is provided in the SCI which accompanies this application. A brief summary of the consultation is presented below.

3.106 Pre-application submission consultations were undertaken with:

- LBC Officers;
- TfL;
- Natural England;
- Environment Agency;
- London Development Agency (LDA);
- Thames Water;
- HS2 Ltd;
- Historic England, including GLAAS; and
- Metropolitan Police.

3.107 In addition, of the 130 stakeholders identified, 12 key stakeholders were identified for more detailed consultation which included the following:

- Cabinet and Ward Councillors;
- Camden Railway Heritage Trust;
- Camden Town Unlimited;
- Primrose Hill Camden Advisory Conservation Committee (PHCAAC);
- Primrose Hill Community Association;
- Harmood Clarence Hartland Residents Association;
- The Roundhouse;
- Regents Canal Conservation Area Advisory Committee;
- Gilbeys Yard;
- Friends of Regents Canal;
- Gloucester Avenue Association; and
- Castlehaven Community Association (Planning & Licensing Sub Committee).

3.108 In addition, extensive public consultation with the local community was also undertaken during the design process prior to the submission of the Application, including two main public exhibitions. The consultation took place over a period of 10 months between November 2016 and April 2017. Multiple rounds of meetings have been held on a one-to-one basis with groups and two major public exhibitions were held in November 2016 and April 2017.

3.109 The scheme has been designed and developed in close collaboration with the LBC through fortnightly meetings during the Masterplan development, and during weekly design meetings on the proposed buildings as part of the Pre-application agreement. The proposed development was also presented to the Camden Design Review Panel on three occasions; and to local councillors on two occasions.

3.110 In response to the above consultation, the following key design developments occurred in response to feedback from LBC planning officers and other consultees as listed above:

- The decision to avoid adding to the extensive bars and night clubs in Camden, but rather create a residential community in the evenings, came directly from listening to local Councillors and their concerns about additional disturbance for neighbouring communities;
- The creation of a second primary route across the application site;
- The reduction of overall height across the scheme;
- Realignment of Block A;
- Reduction in height of tallest buildings (block A) from 17 to 14 storeys;
- Refinement of the distribution of uses across the application site;
- Increase in height to Blocks D and E2;
- Introduction of an Urban Farm to scheme;
- Increase in public space across the proposed development and a roof-top urban farm;
- Redesign of the PFS parcel to increase capacity; and
- The location of green-space, play areas and routes through the sites were informed by discussions with residents and local groups.

Preferred Option

3.111 The main characteristics of the preferred option, that have formed the basis of the assessments in the EIA are as follows:

- Provision of a substantial number of new, high quality homes;
- Delivery of height and massing proposals which take into account consultation responses and the surrounding context;
- Improvement of the application site's accessibility, permeability and legibility;
- Enhancement of the public realm to deliver an integrated design response and improved routes and accessibility through the application site;
- Provision of a new supermarket and petrol station;
- Provision of carefully selected high quality architecture and facades suitable to the location of the application site;
- Provision of integrated public and private squares and spaces;
- Provision of retail floor space and the creation of office floor space and independent workspaces;
- Delivery of improved streetscape and public amenity space.

3.112 The preferred option:

- meets the Applicant's key design concepts and development objectives;
- responds to the housing demand within the LBC;
- is forward looking, encouraging future development nearby;
- delivers a range of land uses to create a truly mixed used development;
- delivers reduced building heights based on surrounding sensitive receptors and consultation comments;
- delivers additional open space, connectivity and improved public realm; and
- responds to the comments received during the pre- and post-application submission consultation processes, particularly in relation to the building heights.

Summary

3.113 The overarching aim of the proposals for application site has been to provide a high quality residential development supported by publicly accessible, landscaped realm, office space, work space and retail units suitable for a range of operators, including independent businesses, and community facilities.

3.114 An extensive selection of alternative site layouts have been considered and honed following feedback and comments from the LBC, key stakeholders and the general public. The alternative layouts and massing options were explored in the context of the application site and environmental constraints and opportunities, environmental influences.

3.115 The proposed development would replace an underutilised brownfield site with a high quality and sustainable residential neighbourhood designed to respond to the local context, whilst retaining and improving the uses already on the application site.

3.116 In addition, the iterative nature of the EIA has assisted in the adoption of key considerations, the identification of potential environmental impacts and consequently the further refinement of plans into their current form.

3.117 The final preferred designs seek to deliver accessibility through inclusive design and the consideration of the needs of all users.

3.118 The final preferred design for the proposed development has evolved over an extensive period of time and represents an appropriate response to all issues arising from extensive consultation with a number of consultees.

3.119 In summary, the principles and opportunities of the redevelopment proposals at the application site would:

- deliver a residential led mixed use development of appropriate scale and massing for the local area, providing a significant number of new, high quality dwellings, including affordable dwellings;
- optimise the potential of the application site to contribute to the LBC's housing targets for the local community; and
- provide significant long-term employment opportunities for the local community, with the retention of the existing supermarket, and through the provision of new office and work space.