

Gavin Sexton
 Regeneration and Planning
 London Borough of Camden
 2nd Floor, 5 Pancras Square
 Judd Street
 London
 WC1H 9JE

Dear Gavin

**ENVIRONMENTAL IMPLICATIONS LETTER: PROPOSED SECTION 73
 MINOR MATERIAL AMENDMENT TO PLANNING CONSENT 2020/0034/P
 FOR CAMDEN GOODS YARD, CAMDEN**

Date 13/07/2020

We write to you on behalf of our Client, St George West London Limited (the 'Applicant') regarding the proposed Minor Material Amendment (MMA) application to be made under section 73 ('S73') of The Town and Country Planning Act 1990 in respect of the 'Camden Goods Yard' project.

Ramboll
 240 Blackfriars Road
 London
 SE1 8NW
 United Kingdom

T +44 20 7808 1420
www.ramboll.co.uk

The Camden Goods Yard project was granted full planning consent in June 2018 (the 'June 2018 consented scheme'). This consent was subsequently superseded by minor material amendments made to the Petrol Filling Station parcel ('PFS parcel') resulting in the 'May 2020 consented scheme'.

Ref L1620008029_2_Camden
 Goods Yard S73 Phase 2A
 EIL

The proposed amendments now sought through the S73 MMA application relate to the Morrisons Supermarket parcel (the 'MS parcel') of the May 2020 consented scheme.

This Environmental Implications Letter (EIL), also referred to as a Statement of Compliance (SoC), reports on the implications of the proposed amendments and of the amended proposed development as a whole (the 'July 2020 amended proposed development') in respect of the conclusions of the Environmental Impact Assessment (EIA) that was undertaken of the June 2018 consented scheme, so that the London Borough of Camden (LBC) has appropriate and up-to-date environmental information on the amended proposed development's environmental effects, to enable the determination of the S73 application.

1. Project Background

In June 2017 a full planning application (ref: 2017/3847/P) was submitted by Safeway Stores Limited and BDW Trading Limited (the 'former Applicant') to the LBC for the redevelopment of a 3.26 hectare (ha) site located off Chalk Farm Road, adjacent to Juniper Crescent and Gilbeys Yard in Chalk Farm, Camden (the 'application site') to deliver the following:

- MS parcel: 573 residential units (60,568 m² gross external area (GEA)); office space (4,867 m² GEA); workshops (779 m² GEA); affordable workspace (565 m² GEA); a Morrisons Supermarket (19,963 m² GEA);

Ramboll UK Limited
 Registered in England & Wales
 Company No: 03659970
 Registered Office:
 240 Blackfriars Road
 London
 SE1 8NW

retail (787 m² GEA); community centre (86 m² GEA); and an urban farm (1,298 m² GEA); and

- PFS parcel: retail (1,627 m² GEA); office (8,114 m² GEA); and winter garden (329 m² GEA).

The June 2018 consented scheme was to be delivered over eight blocks, ranging from 5 to 14 storeys.

The application was accompanied by an ES which reported on the outcomes of the EIA undertaken in accordance with the 2011 EIA Regulations (as amended in 2015) (hereafter referred to as the '2017 EIA/ES').

Despite assessment of a combined heating and power (CHP) plant in the 2017 EIA, the planning consent was for a scheme which uses air source heat pumps (ASHP) and gas boilers.

Subsequent to the grant of planning consent, the following applications were submitted to the LBC between January 2019 and June 2019 for non-material amendments to the June 2018 consented scheme:

- 6 February 2019 section 96A (S96A) application to make non-material amendments to the wording of planning conditions 47, 48 and 49 (2019/0153/P); and
- 4 July 2019 S96A application to make non-material amendments to planning conditions 29, 50 and 60 (2019/2962/P).

Both applications have been granted planning consent. Due to the non-material and insignificant nature of these amendments, the 2017 EIA/ES was not updated.

The Applicant was subsequently selected to deliver the June 2018 consented scheme.

In December 2019, the Applicant submitted a S96A non-material amendment application (planning ref: 2019/6301/P) to amend the proposed development description relating to the PFS parcel of the June 2018 consented scheme.

This was followed in January 2020 by a S73 MMA application (planning ref. 2020/0034/P; the 'January 2020 S73 MMA application') relating to the PFS parcel. The amendments to the PFS parcel were in respect of the construction start date; the construction method of the temporary store; the operational period of the temporary store; car parking provision; and delivery access arrangements.

Due to the minor material nature of the amendments, an updated EIA was undertaken and reported in an EIL (the 'January 2020 EIL'), also referred to as a Statement of Compliance (SoC). The January 2020 EIL presented the updated environmental effects of the amended proposed development as a whole (the 'January 2020 amended proposed development'). The January 2020 EIL concluded that the January 2020 amended proposed development would not alter the conclusions of the 2017 ES. Therefore, the 2017 ES remains valid.

The January 2020 S73 MMA application was considered at the planning committee of 30 April 2020 and was granted planning consent on 5 May 2020 (the 'May 2020 consented scheme')¹.

The May 2020 consented scheme as amended by the July 2020 proposed amendments is hereby referred to as the 'July 2020 amended proposed development'. For the purpose of this updated EIA, the 2017 EIA/ES as updated by the January 2020 EIL is together referred to as the 'updated 2017 EIA/ES'.

¹ The following two subsequent consents have since been granted:

- 2020/0034/P S73 application: Variation of Condition 4 (approved drawings) of planning permission 2017/3847/P dated 15/06/2018 (as amended by 2019/6301/P dated 24/12/2019, 2019/0153/P dated 06/02/2019 and 2019/2962/P dated 04/07/2019) consented 05/05/2020; and
- 2020/2786/P S96 application: To vary the description of development relating to the MS parcel consented 09/07/2020.

As both of these two consents do not materially alter the May 2020 consented scheme, the updated EIA conclusions continue to refer to the May 2020 consented scheme.

2. Proposed Amendments

The July 2020 S73 application proposes the following amendments in respect of Blocks A, B, C and F of the MS parcel:

- Deepening an area of 300 m² within the basement footprint by approximately 4 m to create a two-level basement under Block A;
- Updated basement and lower ground floor layout to account for the following as shown in Figure 1 and Figure 2:
 - Relocation of plant and updated car parking layout;
 - Introduction of a pool, gym and associated facilities beneath Block A, as well as two cinema screening rooms; and
 - Repositioning of energy centre within the basement, to shift further east beneath Block A.
- Increase in the depth of blocks by approximately 1-2.5 m and consequently reduction in courtyard footprints;
- Reduction of floor-to-ceiling heights to 2.5 m and introduction of one to two additional floors to Blocks A-C and F as follows (excluding plant enclosures):
 - Block A1 to increase from 14 to 15 floors (approximately 0.91 m increase from 84.170 mAOD to 85.075 mAOD);
 - Block A2 to increase from 11 to 12 floors (approximately 1.58 m increase from 74.050 mAOD to 75.625 mAOD);
 - Block B1 to increase from 7 to 8 floors (approximately 2.79 m increase from 62.075 mAOD to 64.775 mAOD);
 - Block B2 to increase from 6 to 7 floors (approximately 6.13 m increase from 55.950 mAOD to 62.075 mAOD);
 - Block C to increase from 8 to 10 floors (approximately 4.65 m from 64.125 m AOD to 68.775 m AOD); and 10 to 11 floors to the tallest part of the block set back from the application site boundary (approximately 1 m from 71.250 mAOD to 72.250 mAOD); and
 - Block F2 to increase from 9 to 11 floors (approximately 4.90 m increase from 67.315 mAOD to 72.210 mAOD, approximately 6.56 m increase to 73.875 mAOD when including the proposed new plant enclosure).
- Delivery of 71 additional residential units to 644 residential units from the 573 residential units consented with an associated update in the unit and tenure mix, including an increase in the provision of affordable rent units from 102 to 110, as shown in Table 1;

Table 1: Amended Proposed Development Unit Mix

Unit Type	Block A	Block B	Block C	Block D	Block E1	Block E2	Block F	Total	% of Total
May 2020 Consented Scheme									
Studio	28	12	32	25	10	0	12	119	55
1 bed	42	47	50	8	24	6	33	210	
2 bed	24	51	0	9	16	6	56	162	29
3 bed	13	18	0	0	0	6	37	74	
4 bed	0	0	0	0	0	5	3	8	15
TOTAL	107	128	82	42	50	23	141	573	

Unit Type	Block A	Block B	Block C	Block D	Block E1	Block E2	Block F	Total	% of Total
July 2020 Amended Proposed Development									
Studio	18	20	0	0	10	0	13	61	48
1 bed	44	68	38	25	24	6	43	248	
2 bed	26	66	58	8	16	6	58	238	37
3 bed	22	14	0	9	0	6	38	89	15
4 bed	0	0	0	0	0	5	3	8	
TOTAL	110	168	96	42	50	23	155	644	100

- The proposed residential tenure mix, based on the residential NIA, would provide:
 - 64.46 % private market; (previously 65 %)
 - 22.18 % affordable rent (previously 22 %); and
 - 13.36 % intermediate rent (previously 13 %).

Within the extant consented scheme of the 573 homes, 184 are secured as affordable homes and provided at 39 % affordable habitable rooms. The July 2020 amended proposed development would deliver 203 affordable homes, of the proposed 644 homes, which equates to 38.10 % by habitable room.

- Decrease of 717 m² GIA in the overall provision of commercial space from 26,904 m² to 26,187 m² GIA, within increases in the provision of retail, office, affordable workspace, and urban farm spaces, and decreases in the provision of supermarket (A1), workspace, and community spaces as shown in Table 2 and Figures 3 and 4;

Land Use	May 2020 Consented Scheme			July 2020 Amended Proposed Development		
	GEA (m ²)	GIA (m ²)	NIA (m ²)	GEA (m ²)	GIA (m ²)	NIA (m ²)
Main Site						
Residential (C3) apartments, lobbies, corridors etc.	60,568	51,418	38,561	67,812	56,510	42,383
Ancillary Residential (gymnasium, concierge) (now in Building A)	755	704	607	1,408	1,341	1,140
Residential plant room and parking Energy Center and undercroft F	1,472	1,402		1,149	1,094	
Office (B1)	4,867	4,523	3,654	5,324	4,712	3,770
Workshops (B1c)	779	771	713	664	657	591
Affordable Workspace (B1c)	565	465	465	677	564	564
Morrisons Supermarket – main floorspace (A1)	19,963	19,352	15,539	18,246	17,715	14,712
Retail (Use Class A1 and A3)	787	672	631	1,092	950	902
Community Centre (D2)	86	74	71	86	74	71

Table 2: Amended Proposed Development Area Schedule

Land Use	May 2020 Consented Scheme			July 2020 Amended Proposed Development		
	GEA (m ²)	GIA (m ²)	NIA (m ²)	GEA (m ²)	GIA (m ²)	NIA (m ²)
Urban Farm (<i>sui generis</i>)	1,298	1,047	899	1,894	1515	1,287
PFS Site						
Retail (A1, A3 and A4)*	1,627	1,446	1,103	1,627	1,446	1,103
Office (B1)	8,114	6,873	6,585	8,114	6,873	6,585
Winter Garden (Sui Generis)	329	143	98	329	143	98
TOTAL	101,210	88,890	68,926	108,422	93,594	73,206
*Includes the Petrol Filling Station kiosk				Updates in floorspace description in red text.		

- Reduction in a total of 47 car parking spaces as follows:
 - Foodstore to decrease by 50 car parking spaces from 300 to 250 car parking spaces, 12 accessible; and
 - Residential to increase by three car parking spaces from 20 to 23 car parking spaces, all accessible.
- Increase of 142 residential and 21 commercial long stay cycle parking spaces through the following changes to Blocks A-C and F:
 - Block A to increase from 148 to 173 residential cycle spaces (increase in 25 cycle spaces) and from 12 to 13 commercial cycle spaces (increase in 1 cycle space);
 - Block B to increase from 218 to 288 residential cycle spaces (increase in 70 cycle spaces) and from 39 to 43 commercial cycle spaces (increase in 4 cycle spaces);
 - Block C to increase from 132 to 157 residential cycle spaces (increase in 25 cycle spaces) and from 8 to 22 commercial cycle spaces (increase in 14 cycle spaces); and
 - Block F to increase from 246 to 268 residential cycles spaces (increase in 22 cycle spaces) and from 12 to 14 commercial cycle spaces (increase in 2 cycle spaces).
- Increase of 18 visitor short stay spaces for both residential and non-residential elements across the site in communal areas, from 80 to 98 spaces;
- Increase in private amenity space from 3,209 m² to 3,436 m²;
- Increase of 1,031 m² in the total area of communal amenity, play space and landscaping through the following:
 - Civic space to increase from 6,155 m² to 7,496 m²;
 - Green amenity space to decrease from 3,490 m² to 2,932 m²;
 - Play Space to increase from 1,115 m² to 1,265 m²; and
 - Food growing to increase from 463 m² to 561 m².
- Revised landscaping and public realm strategy as shown in Figure 5, including adjustments in relation to the proposed uplift in the number of residential units, and improvements to the strategy associated with increased tree planting, from 190 to 204 trees, and exclusion of playspace from within the courtyard areas;
- Update and refinement of the Energy Strategy, including changes to the area of PV cells, the heat pump capacity and CO₂ reductions;

- Minor amendments to elevational treatments, including the additional height and some relocations of windows, the removal of all glass balustrades and timber cladding in line with changes to Part B (Fire) of the building regulations and replacement with open vertical metal bars and timber with folded metal cladding, and the use of lighter brick for Block B and F courtyard elevations to enhance daylight of the courtyard and homes facing into it; and
- Update of demolition and construction programme with the year of opening changing from Q4 2023 to Q4 2027 as shown in Table 3.

Table 3: Indicative Demolition and Construction Programme				
Works	Consented Start Date	Consented Completion Date	Proposed Start Date	Proposed Completion Date
Section 278 Works	Q1 2019	Q1 2020	Q1 2020	Q4 2020
PFS Parcel (temporary supermarket)				
Demolition and Enabling Works, Substructure and Tanks	Q1 2020	Q4 2020	Q1 2020	Q2 2020
Frame/Superstructure, Façade/Cladding and Fit Out	Q2 2020	Q1 2021	Q2 2020	Q4 2020
MS Parcel				
Demolition and Enabling Works	Q3 2020	Q1 2021	Q1 2021	Q3 2021
Substructure and Basement	Q3 2020	Q3 2022	Q2 2021	Q1 2023
Supermarket Structure to Podium	Q3 2021	Q4 2022	Q1 2022	Q2 2023
Block A Frame/Superstructure; Façade/Cladding; and Fit Out	Q4 2021	Q1 2024	Q2 2022	Q1 2025
Block B Frame/Superstructure; Façade/Cladding; and Fit Out	Q3 2021	Q3 2023	Q1 2022	Q2 2024
Block C Frame/Superstructure; Façade/Cladding; and Fit Out	Q2 2021	Q1 2023	Q4 2024	Q2 2027
Block D Frame/Superstructure; Façade/Cladding; and Fit Out	Q1 2023	Q4 2024	Q4 2024	Q4 2026
Block E1 Frame/Superstructure; Façade/Cladding; and Fit Out	Q3 2023	Q4 2024	Q2 2025	Q4 2027
Block E2 Frame/Superstructure; Façade/Cladding; and Fit Out	Q3 2023	Q4 2024	Q1 2026	Q4 2027
Block F Frame/Superstructure; Façade/Cladding; and Fit Out	Q3 2023	Q3 2024	Q4 2022	Q2 2025
PFS Parcel (new permanent PFS)				
Strip out temporary store, build new structure and fit out	Q4 2022	Q2 2023	Q4 2024	Q2 2026
Total Programme	Q1 2019	Q4 2024	Q1 2020	Q4 2027



REV	DATE	DESCRIPTION	CHK
P1	10/06/17	ISSUED FOR PLANNING	MWJ
P2	07/20	ISSUED FOR PLANNING	

REVISION	DESCRIPTION
001	Issue for Planning
002	Issue for Planning
003	Issue for Planning
004	Issue for Planning
005	Issue for Planning
006	Issue for Planning
007	Issue for Planning
008	Issue for Planning
009	Issue for Planning
010	Issue for Planning

ITEM	DESCRIPTION	COLOR
001	Structure	Grey
002	Concrete	Light Grey
003	Steel	Dark Grey
004	Other	White
005	Other	Light Blue
006	Other	Light Green
007	Other	Light Yellow
008	Other	Light Purple
009	Other	Light Orange
010	Other	Light Pink

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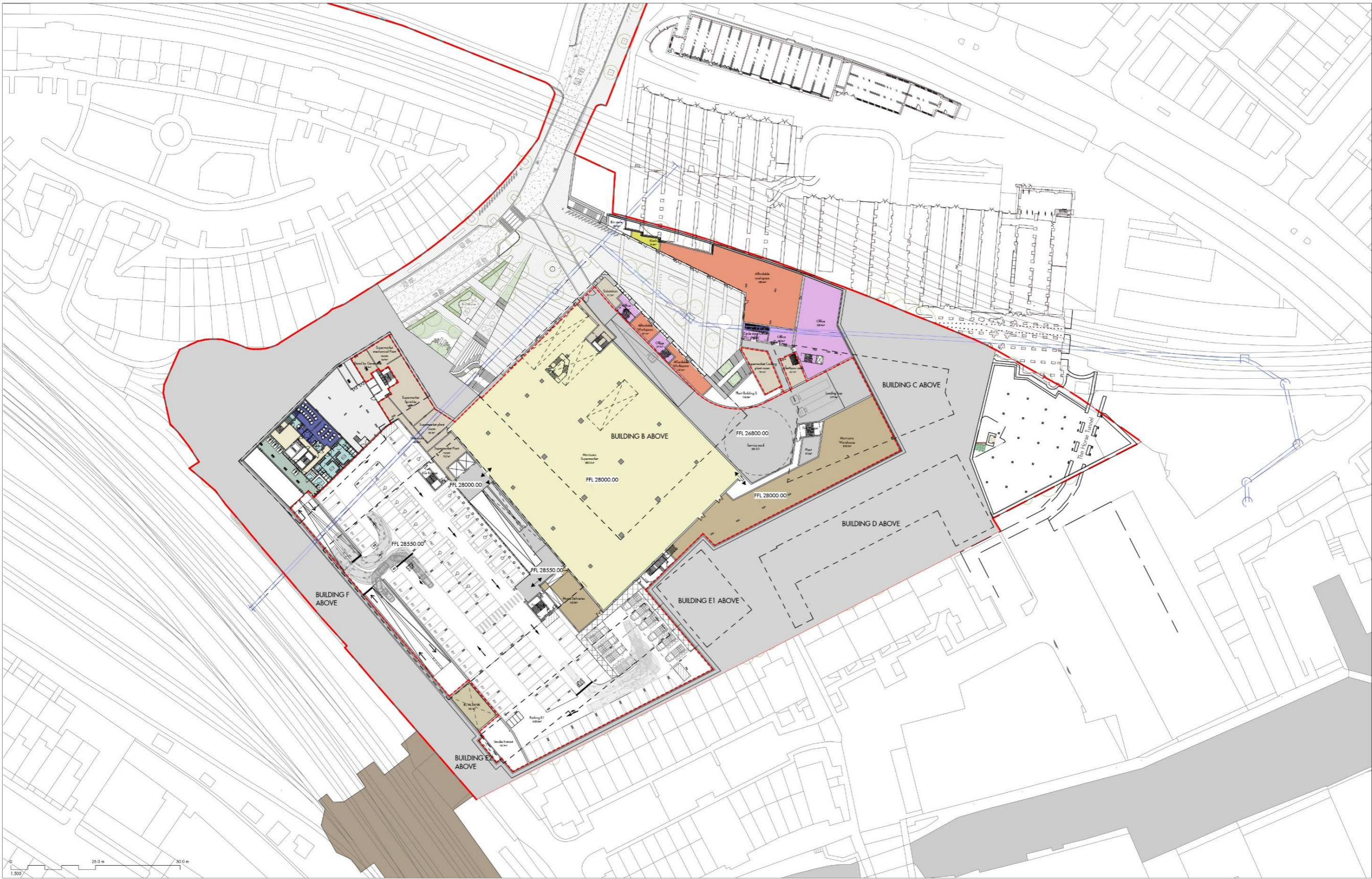
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Alles and Morrison LLP Camden Goods Yard : Master
 85 Southwark Street London SE1 0HR
 t: 020 7921 0100
 f: 020 7921 0101
 email: studio@allesandmorrison.com
 A&M JOB No: 1095

LOWER CAR PARKING PLAN
 MASTERPLAN DRAWINGS TENURE
 1095_00_07_098
 SCALE 1 : 500 @A1 1 : 1000 @A3

P2
 Revision

Figure 1: July 2020 Amended Proposed Development Basement Layout



REV	DATE	DESCRIPTION	CD
P1	30/06/17	ISSUED FOR PLANNING	MCJ
P2	03/10/17	ISSUED FOR PLANNING AMENDMENTS	MCJ
P3	11/10/17	ISSUED FOR PLANNING AMENDMENTS	MCJ
P4	07/20	ISSUED FOR PLANNING	HH

RESIDENTIAL	OTHER USES	FFL
Apartment	Office	Basement
Commercial	Garage	Ground Floor
Industrial	Storage	First Floor
Public	Plant Room	Second Floor
Residential	Roof	Third Floor
Structure	Subsidence	Fourth Floor
Structure	Structure	Fifth Floor
Structure	Structure	Sixth Floor
Structure	Structure	Seventh Floor
Structure	Structure	Eighth Floor
Structure	Structure	Ninth Floor
Structure	Structure	Tenth Floor
Structure	Structure	Eleventh Floor
Structure	Structure	Twelfth Floor

Figure 2 dimensions are in millimetres unless noted otherwise. All dimensions and levels shall be verified on site before proceeding with works. Detailed site surveys to be carried out to verify positions and level relationships with site factors and Ordnance Survey. The Architect must be notified of any discrepancy. Boundaries are indicative only and are to be verified by others.
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Allies and Morrison LLP
 85 Southwark Street
 London SE1 0HX
 Telephone 020 7921 0100
 Facsimile 020 7921 0101
 email studio@alliesandmorrison.com
 A&M JOB No: 1095

Camden Goods Yard : Master
LOWER GROUND FLOOR PLAN
MASTERPLAN DRAWINGS TENURE
 1095_00_07_099
 SCALE 1 : 500 @A1 1 : 1000 @A3

P4
 Revision

Figure 2: July 2020 Amended Proposed Development Lower Ground Floor Layout



Figured dimensions are in millimeters unless noted otherwise. All dimensions and levels shall be verified on site before proceeding with works. Detailed site survey to be carried out to verify positions and level relationships with the features and coordinate survey. The Architect must be notified of any discrepancy. Boundaries are indicative only and are to be verified by others.

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P1	30/06/17	ISSUED FOR PLANNING	NCQ
P2	03/10/17	ISSUED FOR PLANNING AMENDMENTS	NCQ
P3	11/10/17	ISSUED FOR PLANNING AMENDMENTS	NCQ
P4	07/20	ISSUED FOR PLANNING	PP

RESIDENTIAL	OTHER USES	REUSE
Residential Area	Master Suite Area	Re-use
Residential Core	Workshop	Office
Residential Core	Workshop	Workshop
Residential Core	Workshop	Workshop
Residential Core	Workshop	Workshop
Residential Core	Workshop	Workshop
Residential Core	Workshop	Workshop
Residential Core	Workshop	Workshop
Residential Core	Workshop	Workshop
Residential Core	Workshop	Workshop

Allies and Morrison LLP

85 Southwark Street
London SE1 0HX
Telephone: 020 7921 0100
Facsimile: 020 7921 0101
email: studio@alliesandmorrison.com

A&M JOB No: 1095

Camden Goods Yard : Master
GROUND FLOOR PLAN
MASTERPLAN DRAWINGS TENURE
1095_00_07_100

SCALE 1 : 500 @A1 1 : 1000 @A3

P4
Revision

Figure 3: July 2020 Amended Proposed Development Ground Floor Layout



<p>1:500</p> <p>25.0 m</p> <p>50.0 m</p>	<p>Figured dimensions are in millimetres unless noted otherwise. All dimensions and levels shall be verified on site before proceeding with works. Detailed site survey to be carried out to verify positions and level relationships with site features and surrounding survey. The Architect is not responsible for any discrepancy. Boundaries are indicative only and are to be verified by others.</p> <p>Allies and Morrison LLP is not responsible for any errors covered by the transmission, translation, software or computer systems. Allies and Morrison LLP is not responsible for any errors or omissions for the consequences of any use made of the drawings or models other than that for which they were produced by Allies and Morrison LLP for the Client.</p> <p>All Intellectual Property Rights reserved</p>	<table border="1"> <thead> <tr> <th>REV</th> <th>DATE</th> <th>DESCRIPTION</th> <th>CD</th> </tr> </thead> <tbody> <tr> <td>P1</td> <td>30/06/17</td> <td>ISSUED FOR PLANNING</td> <td>MC01</td> </tr> <tr> <td>P2</td> <td>03/10/17</td> <td>ISSUED FOR PLANNING AMENDMENTS</td> <td>MC01</td> </tr> <tr> <td>P3</td> <td>11/12/17</td> <td>ISSUED FOR PLANNING AMENDMENTS</td> <td>MC01</td> </tr> <tr> <td>P4</td> <td>07/20</td> <td>ISSUED FOR PLANNING</td> <td>PH</td> </tr> </tbody> </table>	REV	DATE	DESCRIPTION	CD	P1	30/06/17	ISSUED FOR PLANNING	MC01	P2	03/10/17	ISSUED FOR PLANNING AMENDMENTS	MC01	P3	11/12/17	ISSUED FOR PLANNING AMENDMENTS	MC01	P4	07/20	ISSUED FOR PLANNING	PH	<table border="0"> <tr> <td> <p>RESIDENTIAL</p> <p>1-Bedroom</p> <p>2-Bedroom</p> <p>3-Bedroom</p> <p>4-Bedroom</p> <p>5-Bedroom</p> <p>6-Bedroom</p> <p>7-Bedroom</p> <p>8-Bedroom</p> <p>9-Bedroom</p> <p>10-Bedroom</p> <p>11-Bedroom</p> <p>12-Bedroom</p> <p>13-Bedroom</p> <p>14-Bedroom</p> <p>15-Bedroom</p> <p>16-Bedroom</p> <p>17-Bedroom</p> <p>18-Bedroom</p> <p>19-Bedroom</p> <p>20-Bedroom</p> <p>21-Bedroom</p> <p>22-Bedroom</p> <p>23-Bedroom</p> <p>24-Bedroom</p> <p>25-Bedroom</p> <p>26-Bedroom</p> <p>27-Bedroom</p> <p>28-Bedroom</p> <p>29-Bedroom</p> <p>30-Bedroom</p> <p>31-Bedroom</p> <p>32-Bedroom</p> <p>33-Bedroom</p> <p>34-Bedroom</p> <p>35-Bedroom</p> <p>36-Bedroom</p> <p>37-Bedroom</p> <p>38-Bedroom</p> <p>39-Bedroom</p> <p>40-Bedroom</p> <p>41-Bedroom</p> <p>42-Bedroom</p> <p>43-Bedroom</p> <p>44-Bedroom</p> <p>45-Bedroom</p> <p>46-Bedroom</p> <p>47-Bedroom</p> <p>48-Bedroom</p> <p>49-Bedroom</p> <p>50-Bedroom</p> </td> <td> <p>GENERIC USES</p> <p>Office</p> <p>Retail</p> <p>Restaurant/Cafe</p> <p>Public Space</p> <p>Community</p> <p>Healthcare</p> <p>Education</p> <p>Industrial</p> <p>Storage</p> <p>Other</p> </td> <td> <p>REVISIONS</p> <p>Red</p> <p>Green</p> <p>Blue</p> <p>Yellow</p> <p>Purple</p> <p>Orange</p> <p>Grey</p> </td> </tr> </table>	<p>RESIDENTIAL</p> <p>1-Bedroom</p> <p>2-Bedroom</p> <p>3-Bedroom</p> <p>4-Bedroom</p> <p>5-Bedroom</p> <p>6-Bedroom</p> <p>7-Bedroom</p> <p>8-Bedroom</p> <p>9-Bedroom</p> <p>10-Bedroom</p> <p>11-Bedroom</p> <p>12-Bedroom</p> <p>13-Bedroom</p> <p>14-Bedroom</p> <p>15-Bedroom</p> <p>16-Bedroom</p> <p>17-Bedroom</p> <p>18-Bedroom</p> <p>19-Bedroom</p> <p>20-Bedroom</p> <p>21-Bedroom</p> <p>22-Bedroom</p> <p>23-Bedroom</p> <p>24-Bedroom</p> <p>25-Bedroom</p> <p>26-Bedroom</p> <p>27-Bedroom</p> <p>28-Bedroom</p> <p>29-Bedroom</p> <p>30-Bedroom</p> <p>31-Bedroom</p> <p>32-Bedroom</p> <p>33-Bedroom</p> <p>34-Bedroom</p> <p>35-Bedroom</p> <p>36-Bedroom</p> <p>37-Bedroom</p> <p>38-Bedroom</p> <p>39-Bedroom</p> <p>40-Bedroom</p> <p>41-Bedroom</p> <p>42-Bedroom</p> <p>43-Bedroom</p> <p>44-Bedroom</p> <p>45-Bedroom</p> <p>46-Bedroom</p> <p>47-Bedroom</p> <p>48-Bedroom</p> <p>49-Bedroom</p> <p>50-Bedroom</p>	<p>GENERIC USES</p> <p>Office</p> <p>Retail</p> <p>Restaurant/Cafe</p> <p>Public Space</p> <p>Community</p> <p>Healthcare</p> <p>Education</p> <p>Industrial</p> <p>Storage</p> <p>Other</p>	<p>REVISIONS</p> <p>Red</p> <p>Green</p> <p>Blue</p> <p>Yellow</p> <p>Purple</p> <p>Orange</p> <p>Grey</p>
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P3	11/12/17	ISSUED FOR PLANNING AMENDMENTS	MC01																							
P4	07/20	ISSUED FOR PLANNING	PH																							
<p>RESIDENTIAL</p> <p>1-Bedroom</p> <p>2-Bedroom</p> <p>3-Bedroom</p> <p>4-Bedroom</p> <p>5-Bedroom</p> <p>6-Bedroom</p> <p>7-Bedroom</p> <p>8-Bedroom</p> <p>9-Bedroom</p> <p>10-Bedroom</p> <p>11-Bedroom</p> <p>12-Bedroom</p> <p>13-Bedroom</p> <p>14-Bedroom</p> <p>15-Bedroom</p> <p>16-Bedroom</p> <p>17-Bedroom</p> <p>18-Bedroom</p> <p>19-Bedroom</p> <p>20-Bedroom</p> <p>21-Bedroom</p> <p>22-Bedroom</p> <p>23-Bedroom</p> <p>24-Bedroom</p> <p>25-Bedroom</p> <p>26-Bedroom</p> <p>27-Bedroom</p> <p>28-Bedroom</p> <p>29-Bedroom</p> <p>30-Bedroom</p> <p>31-Bedroom</p> <p>32-Bedroom</p> <p>33-Bedroom</p> <p>34-Bedroom</p> <p>35-Bedroom</p> <p>36-Bedroom</p> <p>37-Bedroom</p> <p>38-Bedroom</p> <p>39-Bedroom</p> <p>40-Bedroom</p> <p>41-Bedroom</p> <p>42-Bedroom</p> <p>43-Bedroom</p> <p>44-Bedroom</p> <p>45-Bedroom</p> <p>46-Bedroom</p> <p>47-Bedroom</p> <p>48-Bedroom</p> <p>49-Bedroom</p> <p>50-Bedroom</p>	<p>GENERIC USES</p> <p>Office</p> <p>Retail</p> <p>Restaurant/Cafe</p> <p>Public Space</p> <p>Community</p> <p>Healthcare</p> <p>Education</p> <p>Industrial</p> <p>Storage</p> <p>Other</p>	<p>REVISIONS</p> <p>Red</p> <p>Green</p> <p>Blue</p> <p>Yellow</p> <p>Purple</p> <p>Orange</p> <p>Grey</p>																								
<p>Allies and Morrison LLP</p> <p>85 Southwark Street London SE1 0HX</p> <p>Telephone: 020 7921 0100 Facsimile: 020 7921 0101 email: stef@alliesandmorrison.com</p> <p>A&M JOB No: 1095</p>	<p>Camden Goods Yard : Master</p> <p>FIRST FLOOR PLAN MASTERPLAN DRAWINGS TENURE 1095_00_07_101</p> <p>SCALE 1 : 500 @A1 1 : 1000 @A3</p>	<p>P4</p> <p>Revision</p>																								

Figure 4: July 2020 Amended Proposed Development First Floor Layout

Bollards



Street Play



Landscaped Steps



Play Areas

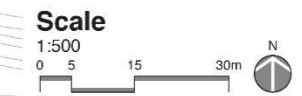


Landscape Elements

1. Stepped amphitheatre seating with integrated play
2. Alfresco style outdoor seating
3. Woodland style planting to green corridor
4. Street play
5. Play area
6. Outdoors gym
7. Community growing gardens
8. Cycle hire stands
9. External lifts

Legend

	Existing trees		Coloured bitumen macadam
	Proposed trees & multi-stems		Yorkstone to LBC highway specification
	Proposed hedging		Green roof
	Shrub planting		Brown roof
	Amenity lawn		Bark play surface
	Flower rich grassland		Rubber play surface
	Granolithic slabs		Self-binding gravel
	Granolithic sets		Loose gravel
	Granolithic slabs to private terraces		Community gardens
	Existing glass bricks		Cycle parking: 98no. short stay spaces
	Bitumen macadam		32no. hire bikes



Community Gardens



MURDOCH WICKHAM
THE LANDSCAPE ATELIER

The Interchange, Broadwater Quay, East Molesey, Surrey, TW20 9DZ
01752 752760 murdochwickham.com

Client: St. George
Date: March 2020

Drawn by: JM
Scale: 1:500 @ A1

Camden Goods Yard
Landscape Masterplan
1573/002 Rev M

Figure 5: July 2020 Amended Proposed Development Landscape Masterplan

3. Approach to Consideration of Environmental Effects

Ramboll, on behalf of the Applicant, submitted an informal EIA Scoping Opinion Request letter to the LBC on 24 March 2020 which outlined the proposed scope of and approach to the updated EIA of the proposed amendments and of the amended proposed development as a whole, as well as the reporting format (see **Appendix 1**). The approach was agreed by the LBC on 17 April 2020 (see **Appendix 2**).

Ramboll and relevant environmental specialists have reviewed the July 2020 amended proposed development, whilst considering the potential implications for the likely environmental effects reported within the updated 2017 EIA. Consideration has been given to:

- any changes to legislation, policy and assessment methodologies since the updated 2017 EIA;
- any changes in baseline conditions since the updated 2017 EIA;
- the conclusions of updated 2017 EIA; and
- any changes to the updated 2017 EIA conclusions as a result of the July 2020 proposed amended proposed development, as well as updated list of cumulative schemes.

The July 2020 EIL should be read alongside the updated 2017 ES. Due to the size of the updated 2017 ES, it has not been appended to this letter but can be provided in electronic format.

A summary of the updated, new or emerging legislation, policy and assessment guidance is presented in Section 4 (legislation and policy).

The changes in baseline conditions, the conclusions of the updated 2017 ES and the updated EIA conclusions are presented in tabular format in Section 5.

In respect of cumulative schemes, Table 4 shows the list of cumulative schemes considered for the updated 2017 EIA/ES and July 2020 EIL as follows:

- The text highlighted in red reflect amendments (i.e. S73) since the 2017 ES and captured in the January 2020 EIL.
- The text highlighted in blue reflect further updated information that have been identified since the January 2020 EIL and that have been considered in undertaking this updated EIA. Completed schemes have been gleaned from a review of Google mapping.

Where cumulative schemes are in the process of being built out or have been completed, these have continued to be considered in the inter-project cumulative effects assessment for consistency and to enable a like-for-like comparison of the conclusions of the updated 2017 EIA. This was agreed with the LBC on 3 June 2020.

Table 4: Cumulative Schemes

- Black text: list of schemes considered in the 2017 ES;
- Red text: updates to list of schemes considered in the January 2020 EIL;
- Blue text: updates to list of schemes scoped with the LBC for the July 2020 EIL; and
- Blue text with yellow highlight: most up-to-date status of 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 Built and considered part of baseline
	2015/4562/P	S73 application to vary condition 65 – namely to change materials on elevation of market building from timber to terracotta	As above

Table 4: Cumulative Schemes

- Black text: list of schemes considered in the 2017 ES;
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- Blue text: updates to list of schemes scoped with the LBC for the July 2020 EIL; and
- Blue text with yellow highlight: most up-to-date status of cumulative schemes.

No	Application Reference	Site	Application Status
	2020/0362/P	Variation and removal of various conditions: To reflect various physical and land use amendments to the permitted scheme.	Registered: 12/02/2020
	2019/2927/P	Non-material amendments: changes to entrances and redistribution of uses.	Granted
	2018/1715/P	Variation and removal of various conditions.	Granted
	2016/6125/P	Non-material amendments: alterations to roof fenestration, materials and housing tenure.	Granted
	2016/3940/P	Variation or removal of various conditions: removal of Condition 59	Granted
	2015/1945/P	Non-material amendments: internally conjoin Area D and Area E	Granted
	2015/5271/P	Non-material amendments: variation to Condition 52	Granted
	2015/4330/P	Non-material amendments: alterations to Area A	Granted
2	2015/4774/P and 2015/4812/L	Camden Lock Market Site, Chalk Farm Road, NW1 8NH.	Granted No conditions discharged. Not built out. Planning permission expired.
3	2013/5403/P	100,100a and 100b Chalk Farm Road, NW1 8EH.	Granted No conditions discharged. Not built out. Planning permission expired.
4	2016/2201/P (2016/7074/P, 2016/5890/P, P2016/7089/P and 2015/1243/P)	44-44a Gloucester Avenue, NW1 8JD.	Granted Built and considered part of baseline
	2019/0882/P	Variation of approved plans.	Granted
5	2016/3975/P	5-17 Haverstock Hill, NW3 2BP.	Granted subject to a Section 106 agreement No conditions discharged. Not built out.
6	2016/6891/P	1 Centric Close London NW1 7EP.	Granted subject to a S016 Built and considered part of baseline
	2019/2329/P	S96A application to alter the size of the windows on the north flank elevation to match the size of the openings on the approved floor plans	Granted

Table 4: Cumulative Schemes

- Black text: list of schemes considered in the 2017 ES;
- Red text: updates to list of schemes considered in the January 2020 EIL;
- Blue text: updates to list of schemes scoped with the LBC for the July 2020 EIL; and
- Blue text with yellow highlight: most up-to-date status of cumulative schemes.

No	Application Reference	Site	Application Status
7	2015/0487/P	Marine Ices 4-8a Haverstock Hill & 45-47 Crogsland Road London NW3 2BL.	Granted subject to a S106 Built and considered part of baseline
	2018/6077/P	Non-material amendments: alterations to internal unit configuration.	Granted
	2017/3018/P	Non-material amendments: reduction in depth of basement.	Granted
8	2015/0921/P	11 Crogsland Road London NW1 8HF.	Granted Conditions discharged. Appears to be under construction.
9	2016/5760/P and 2016/5761/L	The Roundhouse Theatre Chalk Farm Road, NW1 8EH.	Granted No conditions discharged. Does not appear to be under construction.
10	2017/1515/P	28 Camden Wharf Jamestown Road, NW1 7BY (Ice Wharf building).	Resolution to grant at committee
11	2017/2155/P et al.	Various minor exterior amendments at Long Stable Stables Market Chalk Farm Road, NW1 8AH.	Granted
12	2017/1407/P (2017/0492/P and 2014/7908/P)	140-146 Camden Street, NW1 9PF	Granted. Conditions discharged. Appears to be under construction.
	2017/6720/P	S96A application to alter Block A lightwell and railings, omission of ground floor balcony, removal of courtyard lightwell, repositioning of Block B access, re-arrangement of wheelchair unit at ground floor, lighting design, addition of private terraces in courtyard, security fencing, commercial access repositioned, ground floor recess omitted, stair access to communal terrace added, changes to window design and faience columns and repositioning of lift.	Granted
13	2015/6240/P (2015/3396/P, 2015/5160/P, 2015/3443/P, 2014/5730/P and 2013/8088/P)	Camden Collection, Agar Grove Estate, Site 1, Agar Grove, NW1 0RG	Under Construction
	2015/3396/P	S96A application for changes to the levels, footprint, height, window positions, lowering of top canopy, fixing of previously movable screens and various other associated works	Granted

Table 4: Cumulative Schemes

- Black text: list of schemes considered in the 2017 ES;
- Red text: updates to list of schemes considered in the January 2020 EIL;
- Blue text: updates to list of schemes scoped with the LBC for the July 2020 EIL; and
- Blue text with yellow highlight: most up-to-date status of cumulative schemes.

No	Application Reference	Site	Application Status
	2014/5730/P	S96A application for changes to the footprints, heights, window positions and cores of blocks A, F, G and H, building fold line and brick work on block A, and other associated works	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	Granted. Conditions discharged. Appears to be built out.
15	2017/5497/P	2-6 St Pancras Way, NW1 OTB: Demolition of the existing building (Class B1 and B8) and erection of 6 new buildings ranging in height from 2 storeys to 12 storeys in height above ground and 2 basement levels comprising a mixed use development of 54,522sqm business floorspace (B1), 73 residential units (C3) (10xstudio, 29x1 bed, 27x2 bed 7x3 bed), 87 bed hotel (C1), 1,601sqm gym (D2), 5,858sqm flexible retail (A1 - A4) and 6,011sqm storage space (B8) development with associated landscaping work.	Granted No conditions discharged. Does not appear to be under construction.
16	2019/4201/P	St Pancras Commercial Centre 63 Pratt Street London NW1 0BY: Demolition of existing buildings (Class B1c/B8); erection of 3x buildings ranging in height from 5 to 7 storeys above ground and a single basement level comprising a mixed use development of light industrial floorspace (Class B1c/B8), office floorspace (Class B1), 33x self-contained dwellings (Class C3), flexible retail floorspace (Class A1/A3); associated access and servicing, public realm, landscaping, vehicular and cycle parking, bin storage and other ancillary and associated works	Resolution to grant

The location of the cumulative schemes is shown in Figure 6.

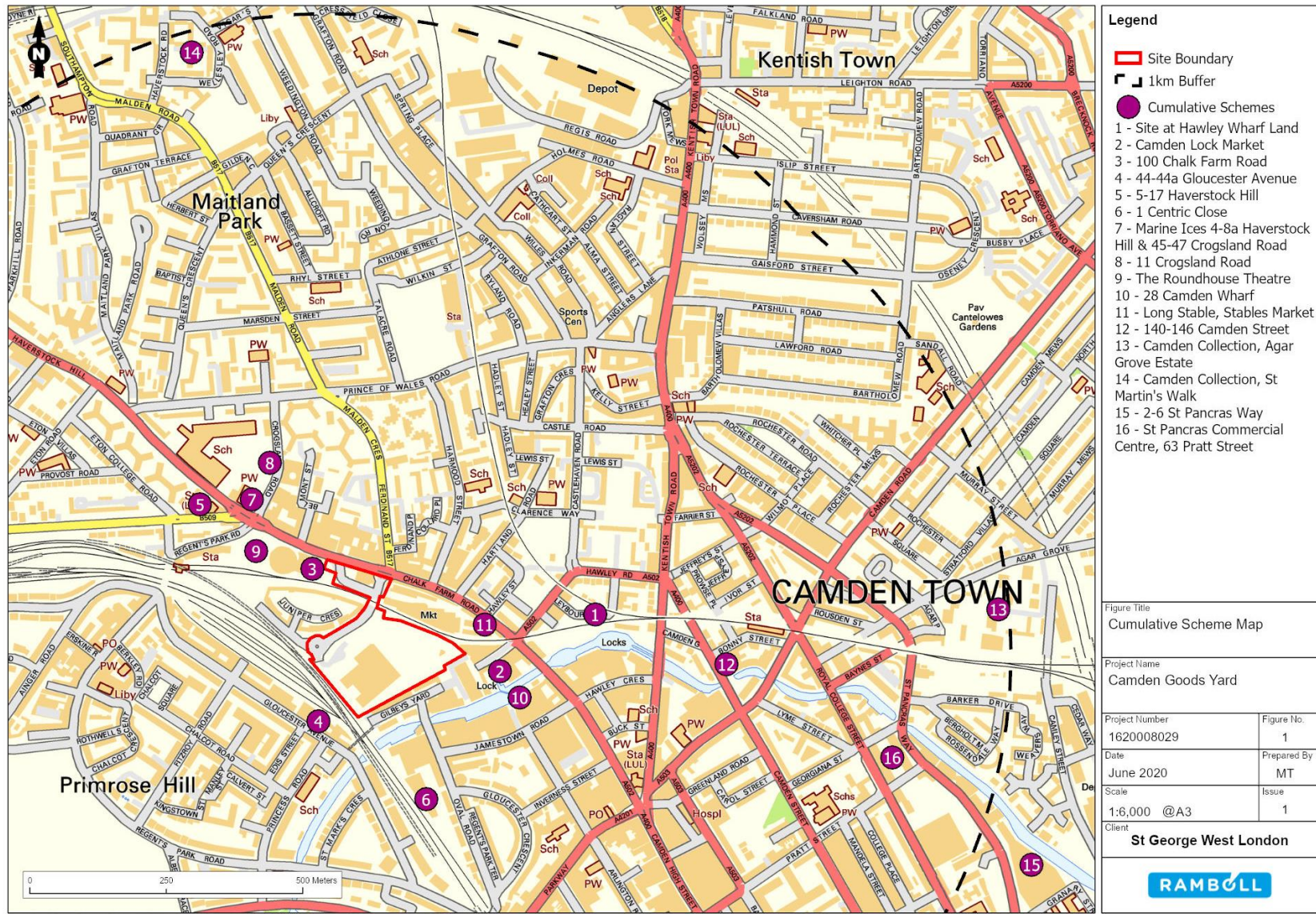


Figure 6: Cumulative Schemes Map

In respect of the HS2 cumulative scheme, an application for the lorry routes to and from the Euston Approaches worksite and Adelaide Road worksite associated with works for HS2 was submitted in September 2019 (2019/4700/HS2) for the following main works activities:

"Construction of the Park Village East retaining wall, portal and high-speed dive unders including the installation of ground anchors; Removal of excavated material from the station approach, tunnel portal and headhouse works; Construction of the decks over the high-speed dive under and railway south of Mornington Street Bridge; Construction of the west and east side retaining wall around Hampstead Road Bridge; Extension of Hampstead Road Bridge as well as associated utilities and highway works; Support the movement of plant and material down into the Euston approach railway cutting; Support the removal of excavated material generated in the railway cutting; Construction of Adelaide Road vent shaft and single storey headhouse building; and all other activities for the purposes and in connection with the scheduled and ancillary works. Incorporating lorry routes detailed in 'List of Roads for Approval' document."

In the January 2020 EIL, it was noted that an application for the lorry routes to and from the Euston Approaches worksite and Adelaide Road worksite associated with works for HS2 was submitted in September 2019 (2019/4700/HS2). A review of the documents submitted within 2019/4700/HS2 did not reveal any further detailed information regarding the construction arrangements within the study area, and in particular from Juniper Crescent.

It is understood that this application was refused by the LBC and the applicant subsequently appealed. The start date for this was on 20 April and will be determined on the basis of written representations which have a deadline of 12 May. No decision was available at the time of writing this assessment.

Accordingly, for the purpose of the July 2020 assessment, the updated EIA has assumed no changes to the HS2 scheme previously assessed. In any event, even should the appeal be granted, it is noted that with respect to the study area, based on the application documents submitted, the applicant only provided a detailed review of impacts on Chalk Farm Road as far as Castlehaven Road to the south and not past the site or on Juniper Crescent, and so the study areas of the two schemes in terms of transport do not overlap. Therefore, the appeal outcome should not affect the conclusions of the July 2020 amended proposed development cumulative assessment.

4. Legislation and Policy

EIA Regulations

The 2017 EIA was carried out pursuant to the 2011 EIA Regulations (as amended in 2015) as agreed with the LBC. In respect of the subsequent 2017 EIA Regulations which were published in May 2017, the following is noted:

- Health was fully considered in the design of the May 2020 consented scheme through the provisioning of on-site open space, amenity, employment and community space. Furthermore, the socio-economic, air quality, noise and vibration, daylight and sunlight assessments have had regard to the health of the newly introduced on-site residential population, as well as off-site residential receptors. The July 2020 amended proposed development would not alter any of these considerations.
- Climate change effects, greenhouse gas emissions, and resilience were considered in the design of the May 2020 consented scheme in respect of the energy strategy and drainage strategy (and associated flood risk assessment), as well as the potential for overheating. Furthermore, the air quality assessment had regard to vehicle and heating plant emissions. The July 2020 amended

proposed development would not alter any of these considerations; although the adoption of ASHP with supplementary boilers will reduce NO_x and CO₂ emissions.

- The nature of the May 2020 consented scheme is such that it is unlikely to result in major accidents and/or disasters. The design of the proposals took account of potential man-made emergencies and accidents such as fire and surface water flooding. The July 2020 amended proposed development would not alter any of these considerations and has sought to improve performance against Fire Regulations.

Accordingly, this letter, when read together with the 2011 EIA Regulations (as amended in 2015) satisfies the environmental considerations of both the 2011 EIA Regulations (as amended in 2015) and the 2017 EIA Regulations.

National Legislation and Policy

In respect of policy and guidance at a national level:

- In March 2012, the Government published the National Planning Policy Framework (NPPF)² which replaced all Planning Policy Statements (PPS) and Planning Policy Guidance (PPG). The NPPF was designed to stimulate growth, to promote sustainable development and to make the planning system less complex and more accessible. The NPPF did not alter the key considerations outlined in the PPS and PPG and is supported by more detailed online and regularly updated Planning Practice Guidance. An updated NPPF was published in July 2018, with minor revisions made in February and June 2019.

The 2019 amendments include minor changes to policy in relation to five-year housing supply and housing and economic need assessments. Additionally, the ambiguity concerning the assessment of developments that are detrimental to existing habitats has also been resolved. Policies concerning transport remain unchanged and the framework continues to be grounded on a 'presumption in favour of sustainable development'.

- In respect of the PPG, regular updates have been made in respect to Environmental Impact Assessment and environmental topic specific guidance.
- Defra published a new Clean Air Strategy³ in 2019 which identifies the requirement for significant improvement in air quality and outlines a number of actions.

These new and revised documents have been reviewed in respect of each environmental topic and it has been concluded that there are no updates of material consideration that would affect the assessment scopes and methodologies of the updated 2017 EIA. These documents have therefore not been considered further within this letter.

Regional Policy

At a regional level, the following is noted:

- A draft New London Plan⁴ was published for consultation in December 2017. The draft plan underwent Examination in Public (EiP) in January to May 2019. An updated version was published in August 2019 where after 'The Intend to Publish London Plan' was submitted to the Secretary of State in December 2019. In March 2020 the Secretary of State issued a response to the Mayor of London which is now being considered. The Mayor of London is taking the statutory steps to finalise the draft London Plan which is expected in late 2020.

² Ministry of Housing, Communities and Local Government, 2019. National Planning Policy Framework. London. HMSO.

³ Department for Environment, Food and Rural Affairs, 2019. Air Quality: Clean Air Strategy 2019 [online]. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf

⁴ Greater London Authority, 2019. Draft New London Plan (Mayor's Intending to Publish version). London.

- The Mayor's Transport Strategy (MTS)⁵ was published in March 2018 and was developed in conjunction with the new draft London Plan and the draft Economic Development Strategy for London (December 2017) as part of a strategic policy framework to support the development of London over the next 25-year period. The MTS outlines the Mayor's vision and how Transport for London (TfL) and its partners aim to achieve this. Three key themes are at the heart of the strategy, namely healthy streets and healthy people; a good public transport experience; and new homes and jobs.
- The London Environmental Strategy⁶ was published in May 2018 which provides new approaches to transforming London's environment in terms of air quality, green infrastructure, climate change, waste, noise and a transition to a low carbon economy.
- The Affordable Housing and Viability Supplementary Planning Guidance (SPG)⁷ was published in August 2017. The new SPG supersedes section 3.3 (Build to Rent) and Part 5 (Viability) of the March 2016 Housing SPG; and the rest of the Housing SPG remains current.

None of the above documents introduce new issues for consideration and does not affect the assessment scopes or methodologies of the updated 2017 EIA. Accordingly, these documents have therefore not been considered further within this letter.

Local Policy

At a local level, the LBC adopted the Camden Local Plan⁸ in July 2017 which supersedes the Camden Local Plan Submission Draft (2016)⁹. The Camden Local Plan Submission Draft was a material consideration in the updated 2017 EIA. The publishing of the Camden Local Plan does not introduce new issues for consideration and does not affect the assessment scopes or methodologies of the updated 2017 EIA.

In addition, the LBC published the Camden Goods Yard Planning Framework SPD¹⁰ in July 2017. The SPD was considered in the updated 2017 EIA and does not introduce new issues for consideration and does not affect the assessment scopes or methodologies of the updated 2017 EIA.

The LBC formally adopted the Camden Planning Guidance Public Open Space (CPGPOS)¹¹ in March 2018. There are no material amendments which affect the assessment scope or methodology.

Accordingly, these documents have not been considered further within this letter.

5. Summary of Environmental Considerations

Table 5 presents the conclusions of the updated EIA of the January 2020 amended proposed development.

Amended Proposed Development Effects

In respect of topics previously scoped out of the updated 2017 EIA (Ground Conditions, Ecology, Flood Risk and Archaeology), the following is noted:

- **Ground Conditions:** The remediation strategy prepared for the May 2020 consented scheme remains valid. It is understood that planning condition 61: contaminated land was discharged in June/July 2019

⁵ Greater London Authority, 2018. Mayor's Transport Strategy. London. GLA.

⁶ Greater London Authority, 2018. London Environment Strategy. London. GLA.

⁷ Greater London Authority, 2017. Affordable Housing and Viability Supplementary Planning Guidance 2017. London. GLA.

⁸ London Borough of Camden (LBC), 2017. Camden Local Plan. London, LBC.

⁹ London Borough of Camden, 2016. Local Plan Submission Draft. London. LBC.

¹⁰ London Borough of Camden, 2017. Camden Goods Yard Planning Framework. London. LBC.

¹¹ London Borough of Camden, 2018. Camden Planning Guidance Public Open Space (CPGPOS). London. LBC.

- Ecology: A Preliminary Bat Roost Assessment was undertaken in November 2019 to discharge planning condition 54, which was granted on 22 December 2019. The report confirms the site conditions remained as previously reported. No evidence of bats was recorded and as such the assessment ruled out the reasonable likelihood of a bat roost being present.
- Flood Risk: The EA flood designation and drainage strategy presented in the updated 2017 ES remain valid.
- Archaeology: Since the 2018 planning consent, an archaeological mitigation strategy for the application site has been agreed with the LBC and their planning advisors, Historic England. This is set out in the Written Scheme of Investigation for an archaeological watching brief dated June 2019 (Revised Version), prepared by RPS Group. It is understood that planning condition 50: archaeology was discharged in June/July 2019.

In respect of topics previously scoped in to the updated 2017 EIA, no changes are anticipated to the conclusions of the updated 2017 EIA/ES with respect to Transport and Accessibility; Air Quality; Vibration; Daylight, Sunlight and Overshadowing; Townscape and Visual; and Heritage. The following changes in conclusions have been reported in respect of Socio-Economics, Noise and Wind:

- A change in secondary school capacity, with a resulting change in effect from **Minor Adverse** to **Negligible**, despite the predicted increase in secondary school child yield (69 vs 60 predicted in 2017).
- A change in the level of on-site open space provision, with the July 2020 amended proposed development to provide 95 % of the required provision for the new residential population. The effect would therefore change from **Minor Beneficial** to **Negligible**.
- An increase in demolition and construction road traffic noise on Juniper Crescent with a resulting change in effect from **Negligible** to **Minor Adverse** in the cumulative scenario. The temporary effect would remain insignificant.
- Wind conditions would be consistent with the previous assessment conducted in 2017, with the exception of:
 - two new receptor locations (128 and 129) introduced to test newly introduced seating areas where conditions at location 128 would be one category windier than required for sitting use with the landscaping scheme modelled;
 - receptor location 173 (82 in the 2017 assessment), which would be one category windier than required for thoroughfare use with the landscaping scheme modelled; and
 - receptor location 233 which would be one category calmer and therefore suitable for the intended amenity use.

Conditions at locations 112 (previously 164), 199 and 242 would remain one category windier consistent with the 2017 results. Strong winds would occur at locations 173 and 242. Location 242 would only require maintenance access and therefore no mitigation would be necessary.

While the updated modelling conclusions indicate significant effects are likely to arise at the five locations (112, 128, 173 and 199), the wind specialists has proposed a range of additional landscaping features based on professional judgement and experience which are expected to improve conditions, such that significant effects are unlikely to arise. This will be demonstrated in further wind tunnel testing to be secured by planning condition.

Supporting technical reports have been prepared in respect of socio-economics; transport; air quality; noise and vibration; wind; daylight, sunlight and overshadowing; townscape and visual, as well as built heritage. These reports are provided in **Appendices 3-10**).

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
<i>ES Chapter 6: Socio-Economics</i>			
<p>The assessment methodology has remained unchanged with the exception of the new GLA Population Yield Calculator (2019, v.3.2) which has been used to calculate a worst-case population estimate.</p> <p>The proposed amendments do not introduce any new issues for consideration in the updated assessment.</p>	<p>Latest available data on education provision in Primary School Planning Area 3 and borough wide for secondary (LBC, 2019) indicates current capacity of 382 primary school places and 525 secondary school places. Forecasts to 2028/29 indicate ongoing surplus: for primary this is not forecast to fall below 170 surplus places in any year and for secondary this is not forecast to fall below 477 surplus places in any year. These forecasts take into account a number of schemes including May 2020 consented scheme.</p> <p>There remains capacity across healthcare provision (GPs, hospitals, pharmacies and dentists). There is an average of 1,345 patients per Full Time Equivalent GP within 1 mile of the application site, which is lower than the Camden-wide average of 1,482. There are a range of pharmacies, opticians and hospitals within proximity to the site.</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <p>Support construction employment:</p> <ul style="list-style-type: none"> • Negligible (neighbourhood level) • Minor Beneficial (local and wider levels) <p>Support construction apprenticeships:</p> <ul style="list-style-type: none"> • Major Beneficial (local level) • Minor Beneficial (wider level) <p>Generate construction productivity:</p> <ul style="list-style-type: none"> • Minor Beneficial (local and wider levels) <p>Generate expenditure:</p> <ul style="list-style-type: none"> • Minor Beneficial (neighbourhood level) • Negligible Beneficial (local and wider levels) <p><u>Completed Development</u></p> <p>Increase employment opportunities:</p> <ul style="list-style-type: none"> • Minor Beneficial (neighbourhood and local levels) • Negligible (wider level) <p>Enhance local labour provision and skills:</p> <ul style="list-style-type: none"> • Major Beneficial (neighbourhood level) • Moderate beneficial (local level) • Negligible (wider level) <p>Increase local business space and support business activity:</p> <ul style="list-style-type: none"> • Minor Beneficial (local level) 	<p>Updated Residual Effects</p> <p><u>Demolition and Construction</u></p> <p>As the proposed amendments would result in scheme changes there is likely to be a marginal change in construction employment (and associated construction expenditure); however, this would not affect the overall scale or nature of demolition and construction effects. Accordingly, the conclusions of the updated 2017 EIA remain valid.</p> <p><u>Completed Development</u></p> <p>There would be small changes to the non-residential floorspace; however, the effects associated with increased employment opportunities; local labour provision and skills; increased local business space and support business activity; and business rate revenue would remain unchanged in terms of the updated 2017 assessment conclusions.</p> <p>The scale of additional units is minor and therefore the effects in respect of housing demand; residential income and expenditure; and residential council tax revenue would remain unchanged in terms of the updated 2017 assessment conclusions.</p> <p>The additional 71 residential units and change in accommodation schedule would result in a change in the estimated population (1,328 residents estimated using a worst-case scenario when compared to 1,124 estimated in 2017). It will also result in a change to the number of primary (94 vs 84 predicted in 2017) and secondary (67 vs 60 predicted in 2017) pupils estimated.</p>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
	<p>The open/play space baseline is unchanged in terms of the Council’s evidence base.</p> <p>Further detail is provided in Appendix 3.</p>	<p>Provide new housing, including affordable:</p> <ul style="list-style-type: none"> • Minor Beneficial (local level) <p>Generate income and expenditure:</p> <ul style="list-style-type: none"> • Major Beneficial (neighbourhood level) • Moderate Beneficial (local level) • Negligible Beneficial (wider level) <p>Generate Council Tax revenue</p> <ul style="list-style-type: none"> • Moderate Beneficial (local level) <p>Generate New Homes Bonus payments</p> <ul style="list-style-type: none"> • Major Beneficial (local level) <p>Generate business rate revenue</p> <ul style="list-style-type: none"> • Moderate Beneficial (local level) <p>Increase demand for primary education facilities</p> <ul style="list-style-type: none"> • Negligible (neighbourhood level) <p>Increase demand for secondary education facilities</p> <ul style="list-style-type: none"> • Minor Adverse (neighbourhood level) <p>Increase demand for health education facilities</p> <ul style="list-style-type: none"> • Negligible (neighbourhood level) <p>Increase demand for open space and recreation facilities</p> <ul style="list-style-type: none"> • Minor Beneficial (neighbourhood level) <p>Increase demand for children’s play space:</p> <ul style="list-style-type: none"> • Minor Beneficial (neighbourhood level) <p>Reduced crime levels through increased local activity:</p>	<p>The updated position with regard to demand for primary education facilities, secondary education facilities and open space/play space can be summarised as follows, with further details provided in Appendix 3:</p> <ul style="list-style-type: none"> • There is sufficient capacity locally both currently and forecast to accommodate the additional primary age pupils (94 vs 84 predicted in 2017). This effect would therefore remain Negligible (local level). • There is sufficient capacity locally both currently and forecast to accommodate the additional secondary age pupils (69 vs 60 predicted in 2017). The effect would therefore change from Minor Adverse reported in updated 2017 EIA to Negligible (neighbourhood level). • The increase in residents would require an additional 0.8 GPs compared to 0.7 GPs predicted in 2017. The effect would therefore remain as Negligible. • Under the worst-case population estimate the July 2020 amended proposed development would provide 95 % of its required open space provision¹². The effect would therefore change from Minor Beneficial to Negligible. • The proposed development would exceed the quantum of formal and informal play space required. The effect would therefore remain as Minor Beneficial. • In respect of reduced crime levels, the updated 2017 conclusion of Minor Beneficial remains unchanged given there are no changes to the scheme which are perceived to impact on this differently to that assessed for the updated 2017 assessment conclusions. <p>Additional mitigation would not be required.</p> <p>Updated Cumulative Effects</p>

¹² Using the Census methodology as applied in the 2017 ES, the proposed development will meet its open space requirements.

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
		<ul style="list-style-type: none"> • Minor Beneficial (neighbourhood level) <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> • Employment: Major Beneficial • Productivity: Moderate Beneficial <p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> • Employment: Major Beneficial • Productivity: Moderate Beneficial • Population, Labour Force and Skills: Major Beneficial • Business Space and Activity: Moderate Beneficial • Housing: Moderate Beneficial • Income and Expenditure: Major Beneficial • Local Authority Revenue: Major Beneficial • Public Services: Negligible to Minor Adverse 	<p><u>Demolition and Construction</u></p> <p>The conclusions of the updated 2017 assessment remain unchanged in respect of cumulative employment and productivity.</p> <p><u>Completed Development</u></p> <p>The cumulative effects in respect of increased employment opportunities; productivity; population, labour force and skills; business space and activity; local business space and support business activity; new housing; income and expenditure; council tax and business rate revenue would remain unchanged in terms of the updated 2017 assessment conclusions.</p> <p>With regard to primary and secondary education, health facilities, open space and play space:</p> <ul style="list-style-type: none"> • There is sufficient capacity to accommodate the cumulative primary and secondary education demand. • The addition of the cumulative schemes would not result in GP:patient ratios above the current borough average. The level of demand on wider health provision (hospitals, pharmacies, opticians) is not anticipated to be beyond the available capacity of these facilities. • The majority of cumulative schemes would include provision of open and play space. For those cumulative schemes which do not include additional provision (equivalent to 294 residents) it is anticipated that the demand for open space generated at the scale of both the neighbourhood impact area and the borough will result in minimal change to the per person provision of open space.

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
<i>ES Chapter 7: Transport and Accessibility</i>			
<p>Since the updated 2017 EIA, the following new guidance has been published:</p> <ul style="list-style-type: none"> The TFL published Healthy Streets¹³ for London in 2017, which sets out policies and strategies to help Londoners use cars less, and walk, cycle and use public transport more. It is a long-term plan aimed at improving experiences of London’s streets, and helping people to be more active and enjoy the health benefits of being on London’s streets. <p>TfL also now applies a ‘Vision Zero’ approach to public safety which aims to eliminate all deaths and serious injuries from London’s transport network by 2041. The Healthy Streets and Vision Zero approaches help new developments in London improve air quality, reduce congestion and make the</p>	<p>The traffic and pedestrian surveys for the updated 2017 EIA were undertaken in May 2016. It is noted that these surveys were undertaken beyond the typical three-year validity period; however, there are several points to acknowledge in considering the validity of the surveys. Firstly, for the May 2020 consented scheme it was agreed with the LBC and TfL that no growth should be applied to baseline traffic as it was considered unlikely that traffic growth would occur within the study area. Secondly, there have been no significant changes to Juniper Crescent (i.e. no new development or infrastructure, or changes to the Morrisons supermarket) that would impact the level of traffic that travels along access roads in the baseline scenario. Finally, it is not possible to undertake updated traffic surveys at the time of writing this letter owing to the Covid-19 pandemic and resulting lockdown restrictions, which have significantly affected</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Severance: Minor Adverse Driver Delay: Negligible Pedestrian Delay: Negligible Fear and Intimidation: Negligible Pedestrian Amenity: Negligible Accidents and Safety: Negligible Driver Stress: Minor Adverse Highway Capacity: Negligible Public Transport Capacity: Negligible <p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> Severance: Minor Adverse Driver Delay: Minor Adverse Pedestrian Delay: Minor Adverse Fear and Intimidation: Minor Adverse Pedestrian Amenity: Negligible Accidents and Safety: Negligible Driver Stress: Negligible Highway Capacity: Negligible Public Transport Capacity: Minor Adverse <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Severance: Minor Adverse 	<p>Updated Residual Effects</p> <p>Appendix 4 presents the Transport Assessment Addendum (TAA) and provides supporting evidence to the conclusions reached below.</p> <p><u>Demolition and Construction</u></p> <p>As part of recent consultation with the Applicant to assist the production of the required Construction Management Plan for the demolition and construction stage of the July 2020 amended proposed development, revised estimates of the peak number of daily vehicle movements associated with demolition and construction of the development have been provided. In the updated 2017 EIA, the assessment of the demolition and construction stage was based on an estimate of up to 85 daily HGV movements at the peak (170 two-way movements). This estimate has now been increased to a peak level of 180 daily HGV movements (360 two-way movements). As such the assessment of residual effects for this stage in the updated 2017 ES has been reviewed in light of the new traffic flows calculated for this stage, which are included in the Transport Assessment Addendum (TAA) (presented in Appendix 4).</p> <p>Based on a review of each topic assessed in the updated 2017 EIA, the following details provide a summary of any notable changes in residual effects during the demolition and construction stage:</p> <ul style="list-style-type: none"> <i>Severance</i> – The higher volume of anticipated daily HGV movements during demolition and construction results in the magnitude of impact on Juniper Crescent changing from medium (over a 60% increase HGVs) in the updated 2017 EIA, to high based on the updated flows

¹³ Transport for London (TfL), 2017. Healthy Streets for London. London. TfL.

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
<p>city a greener, healthier and more attractive place to live, work play and do business.</p> <p>The new guidance would not affect the scope or methodology of the transport and accessibility assessment, noting that the May 2020 consented scheme followed a comprehensive review of accessibility by all modes, and includes a significant range of planning obligations to enhance local opportunities for non-car travel.</p> <p>The proposed amendments and the July 2020 amended proposed development as a whole do not introduce any new issues for consideration in the updated assessment.</p>	<p>traffic volumes and would render surveys unrepresentative. Therefore, it is considered that the previous surveys used to derive baseline flows remain valid for the updated assessment.</p>	<ul style="list-style-type: none"> • Fear and Intimidation: No cumulative effects <p><u>Completed Development</u></p> <ul style="list-style-type: none"> • Severance: Minor Adverse • Fear and Intimidation: No cumulative effects • Accidents and Safety: Negligible 	<p>(over a 90% increase in HGVs). However, based on the significance criteria matrix in Table 7.2 of the updated 2017 EIA, this does not change the resulting significance of effect (Major Adverse). The updated 2017 EIA concluded this residual effect as Minor Adverse on the basis that overall traffic flows would be a significant reduction during this stage compared with the total traffic baseline (-72.16%) because of the closure of the Morrisons supermarket and associated reduction in flows of the temporary store. The same consideration applies for the updated traffic flows (-61.67%). Accordingly, the residual effect on severance during this stage would remain temporary Minor Adverse.</p> <ul style="list-style-type: none"> • Driver Delay and Pedestrian Delay – Despite the increase in HGVs, the completed development stage flows would continue to represent worst case. Therefore, as set out in the updated 2017 EIA, effects on driver delay have only been assessed for the completed development stage on the basis that overall flows would be much lower during the demolition and construction stage, and so the residual effects would remain temporary Negligible. <p>Fear and Intimidation – Despite the increase in HGVs, and taking into consideration the methodology applied in the updated 2017 EIA, the two-way 18-hour HGV flow on Juniper Crescent (564 compared with 374 previously) would still be classed as moderate, i.e. no material change from the consented scheme. As such, a comparison with the future baseline flows confirms that the effects would remain temporary, Negligible. The tables below confirm the updated assessment of fear and intimidation based on the methodology applied in the updated 2017 EIA:</p>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development																																																					
			<p data-bbox="1473 292 2130 352">Demolition and Construction Fear and Intimidation Hazard Level</p> <table border="1" data-bbox="1438 376 2121 624"> <thead> <tr> <th rowspan="2">Link</th> <th colspan="4">Baseline</th> <th colspan="4">Demolition and Construction</th> </tr> <tr> <th>18-hr av. hourly flow</th> <th>18-hr total HGV flow</th> <th>Av. Speed</th> <th>Overall Hazard Level</th> <th>18-hr av. hourly flow</th> <th>18-hr total HGV flow</th> <th>Av. Speed</th> <th>Overall Hazard Level</th> </tr> </thead> <tbody> <tr> <td>Juniper Crescent</td> <td>151 (slight)</td> <td>203 (slight)</td> <td>15-20mph (great)</td> <td>Moderate</td> <td>68 (slight)</td> <td>564 (slight)</td> <td>15-20mph (great)</td> <td>Moderate</td> </tr> <tr> <td>Chalk Farm Road (west)</td> <td>416 (slight)</td> <td>515 (slight)</td> <td>15-20mph (great)</td> <td>Moderate</td> <td>419 (slight)</td> <td>915 (slight)</td> <td>15-20mph (great)</td> <td>Moderate</td> </tr> </tbody> </table> <p data-bbox="1473 644 2130 705">Demolition and Construction Fear and Intimidation Effects</p> <table border="1" data-bbox="1449 722 2121 938"> <thead> <tr> <th>Link</th> <th>Sensitivity</th> <th>Baseline Hazard Level</th> <th>D+C Hazard Level</th> <th>Magnitude of Impact</th> <th>Significance of Effect</th> </tr> </thead> <tbody> <tr> <td>Juniper Crescent</td> <td>High</td> <td>Moderate</td> <td>Moderate</td> <td>No impact</td> <td>No effect</td> </tr> <tr> <td>Chalk Farm Road (west)</td> <td>High</td> <td>Moderate</td> <td>Moderate</td> <td>No impact</td> <td>No effect</td> </tr> </tbody> </table> <ul data-bbox="1438 959 2130 1380" style="list-style-type: none"> • Pedestrian Amenity – Although the HGV flows would increase by more than double, the total traffic future baseline flows would not be doubled or halved due to the absence of supermarket traffic during this stage, and so the effects on pedestrian amenity would remain temporary, Negligible. • Accidents and Safety – The updated peak hour traffic flows and percentage changes compared with the future baseline do not change the magnitude of impact or resulting significance of effect for any of the previously identified accident clusters on the local road network. Consequently, the residual effects would remain temporary, Negligible. 	Link	Baseline				Demolition and Construction				18-hr av. hourly flow	18-hr total HGV flow	Av. Speed	Overall Hazard Level	18-hr av. hourly flow	18-hr total HGV flow	Av. Speed	Overall Hazard Level	Juniper Crescent	151 (slight)	203 (slight)	15-20mph (great)	Moderate	68 (slight)	564 (slight)	15-20mph (great)	Moderate	Chalk Farm Road (west)	416 (slight)	515 (slight)	15-20mph (great)	Moderate	419 (slight)	915 (slight)	15-20mph (great)	Moderate	Link	Sensitivity	Baseline Hazard Level	D+C Hazard Level	Magnitude of Impact	Significance of Effect	Juniper Crescent	High	Moderate	Moderate	No impact	No effect	Chalk Farm Road (west)	High	Moderate	Moderate	No impact	No effect
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Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
			<ul style="list-style-type: none"> • Driver Stress – The updated 2017 EIA assessed impacts on driver stress qualitatively, identifying the minor adverse effect based on uncertainty for drivers whilst the road layout is being altered and also owing to limited parking at the temporary store during the demolition and construction stage of the MS parcel. Based on professional judgement and experience, these qualitative factors remain unchanged and so the residual effect of temporary Minor Adverse, remains valid. • Highway and Public Transport Capacity – The revised HGV traffic flows would still result in overall net reductions during demolition and construction, and demands on public transport are also still predicted to reduce overall. These effects would therefore remain temporary, Negligible as per the findings of the updated 2017 EIA. <p>Based on the above, it is concluded that even with the potential increased peak daily HGV movements now predicted to be generated by the site during the demolition and construction stage, the residual effects during this stage would be the same as those reported in the updated 2017 EIA. Furthermore, it should be noted that the potential to relocate existing bus services away from Juniper Crescent to Ferdinand Street during demolition and construction is being explored, and on the assumption this occurs, the net change in HGV movements on Juniper Crescent during this stage would be much lower as no buses would use this road. Accordingly, a worst-case has been assessed assuming both existing bus services and construction traffic would share use of Juniper Crescent during construction.</p>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
			<p><u>Completed Development</u></p> <p>The TAA (presented in Appendix 4) shows that the proposed amendments would result in an uplift in trip generation (Table 3.4).</p> <p>Based on revised trip generation calculations, it has been calculated that the completed development would result in an increase in vehicle trip generation in the peak hours on the shared access road during this stage. These flows are the difference between the baseline and the completed development flows on Juniper Crescent, and so represent the net change in traffic resulting from the whole completed development rather than total development flows in isolation, and can be summarised as follows based on Table 3.7 in the TAA:</p> <ul style="list-style-type: none"> • AM Peak: 34 two-way vehicle movements • PM Peak: 26 two-way vehicle movements • Daily: 301 two-way vehicle movements <p>The above net increases in traffic compared to the baseline are only minor increases compared to those included in Figure 7.2 the updated 2017 EIA, with the increases compared with the previous assessment as follows:</p> <ul style="list-style-type: none"> • AM Peak: 5 two-way vehicle movements • PM Peak: 2 two-way vehicle movements • Daily: 32 two-way vehicle movements <p>The above changes are considered to be <i>de minimis</i> and would not affect the conclusions of the residual effects as reported in the updated 2017 EIA. As per the flows presented in Tables 3.7 and 3.9 of the TAA, the changes on Chalk Farm Road and Ferdinand Street would also be <i>de minimis</i> and so would not affect the conclusions of the updated 2017 EIA.</p> <p>Additional mitigation would not be required.</p>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
			<p>Accordingly, no new or amended significant transport and accessibility effects are likely to arise for the July 2020 amended proposed development.</p> <p>Updated Cumulative Effects</p> <p>In respect of cumulative effects, the previously reported inter-project effects within the updated 2017 ES would remain valid, due to the non-material nature of the updates to the updated 2017 cumulative schemes. A review of the application documents for the two additional schemes highlighted in Table 1 (numbers 15 and 16 in the table) confirms that the construction routes for both schemes are outside of the study area for the updated 2017 EIA, and so these schemes result in no material change to the previous assessment of cumulative demolition and construction effects. In addition, it has been confirmed that no new HS2 information is available in the public domain. The mitigation measures previously offered in working collaboratively with HS2 and other cumulative schemes in the study area to minimise disruption during the demolition and construction stages, remain valid.</p> <p>In respect of cumulative completed development effects, as per the updated 2017 EIA no traffic flows for the completed developments in Table 1 have been taken into account in the cumulative scenario as all nearby schemes are generally car-free and/or the study areas for assessment do no overlap. For robustness the assessment of cumulative completed development effects still allows for possible construction phases of the other sites and confirms no change in significance of effects compared with the updated 2017 EIA.</p> <p>Furthermore, no new or amended significant transport and accessibility effects have been reported for the July 2020 amended proposed development. Therefore, the intra-</p>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
			cumulative effects of the updated 2017 EIA remain valid in respect of transport and accessibility effects.
<i>ES Chapter 8: Air Quality</i>			
<p>Since the updated 2017 EIA, the following Atmospheric Dispersion Modelling System (ADMS) models¹⁴ have been published for use:</p> <ul style="list-style-type: none"> ADMS Roads 5. <p>In addition to this, Defra has made the following updates:</p> <ul style="list-style-type: none"> Vehicle emission factors (v9.0); Mapped background concentrations; and NOx to NO₂ calculator. <p>The updates would not affect the scope or methodology of the air quality assessment but are integrated into the revised assessment.</p> <p>The proposed amendments and the July 2020 amended proposed development as a whole do not introduce any new issues for consideration in the updated assessment, however, they do alter the traffic data upon which the</p>	<p>It is noted that the most up-to-date air quality monitoring data indicates that baseline concentrations of pollutants in the London Borough of Camden have reduced since 2016. However, high concentrations in excess of objective concentrations are still experienced at locations adjacent to the main road network as is evident from the monitoring data used to verify the model (CA16 and CA23).</p> <p>In respect of traffic flows, the transport consultants have provided updated traffic flow data which has been utilised in the updated assessment.</p> <p>Baseline conditions, based on updated modelling are not significantly different to those provided in the updated 2017 EIA.</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Dust emissions (on- and off-site): Negligible Construction transport emissions (on- and off-site): Minor Adverse <p><u>Completed Development</u></p> <ul style="list-style-type: none"> Operational plant emissions (on- and off-site): Negligible Operational transport emissions (on- and off-site): Negligible <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Dust emissions: Not significant <p><u>Completed Development</u></p> <ul style="list-style-type: none"> NO₂: Negligible PM₁₀: Negligible <p><i>Air Quality Neutral</i></p> <p>The updated 2017 EIA concluded that the May 2020 consented scheme would meet the air quality neutral requirements and no mitigation is required.</p>	<p>Updated Residual Effects</p> <p>The land uses of the July 2020 amended proposed development remains consistent with that previously environmentally assessed for the updated 2017 EIA. Appendix 5 presents an update of the stand-alone air quality report that accompanied the previous planning applications providing supporting evidence to the conclusions reached below.</p> <p><u>Demolition and Construction</u></p> <p>The amended demolition and construction programme does not alter the assessment of dust and PM₁₀ impacts related to demolition and construction. The dust emission magnitude for construction is the only element which could be liable to change as a result of the slight change in building volume, however, emission magnitude was previously assessed as Large and therefore no change to the assessment is required and the residual effect remains temporary Negligible.</p> <p>In respect of transport emissions, despite the estimated increase in demolition and construction HGV movements, the overall traffic flows would still be a significant reduction during this stage compared with the baseline (-61.67%) given the closure of the Morrisons supermarket and associated reduction in flows of the temporary store. Accordingly, the residual effect on transport emissions would remain temporary Minor Adverse.</p>

¹⁴ Cambridge Environmental Research Consultants (CERC), 2019. <http://www.cerc.co.uk/environmental-software/ADMS-Roads-model.html>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
<p>assessment modelling is based and therefore this has been updated.</p> <p>Changes to the energy strategy are relevant to air quality in that they remove an emission source (the previously proposed CHP).</p>			<p><u>Completed Development</u></p> <p>Changes to the development plans would result in minor uplifts in the completed development traffic flows presented in the updated 2017 EIA. This, as well as updates to baseline data and published emissions factors have resulted in changes to predicted pollutant concentrations at existing and proposed receptors. However, these revised concentrations are considered to be immaterial and the residual effects on operational transport emissions, as reported in the updated 2017 ES, would remain Negligible.</p> <p>Upon completion and operation, energy centre emissions are expected to be changed when compared to those that would be associated with the May 2020 consented scheme. This is due to the additional heat requirements for the additional units, as well as the updated plant specification. The effect of emissions from the energy centre would not be significant, in keeping with the May 2020 consented scheme.</p> <p>Revised building and transport emissions have been assessed against "air quality neutral" assessment benchmarks. The amended proposed development is considered to be air quality neutral.</p> <p>Additional mitigation would not be required.</p> <p>Accordingly, no new or amended significant air quality effects are likely to arise for the July 2020 amended proposed development.</p> <p>Updated Cumulative Effects</p> <p>In respect of cumulative effects, the previously reported intra- and inter-project effects within the updated 2017 ES would remain valid, due to the non-material nature of cumulative scheme updates and because no new or</p>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
			amended significant air quality effects have been reported for the July 2020 amended proposed development.
<i>ES Chapter 9: Noise and Vibration</i>			
<p>Since the updated 2017 EIA the following new guidance has been published:</p> <ul style="list-style-type: none"> The Institute of Acoustics published ProPG¹⁵ in 2017 to encourage sustainable residential development through good acoustic design. BS4142:2014 + A1:2019 Methods for rating and assessing industrial and commercial sound. This update follows feedback from users, revised examples and changes to improve the consistency of assessments. The fundamental guidance and approach remain unchanged. Acoustics Ventilation and Overheating - Residential Design Guide, January 2020 (AVO). The Association of Noise Consultants published 	<p>There have been no significant developments in the area that would introduce fixed noise sources that would impact on the proposals or the local acoustic environment.</p> <p>Furthermore, the transport consultants have confirmed that there is no anticipated growth in the traffic volumes of the study area. Therefore, the previously provided traffic data remains valid and the associated noise would remain consistent with the 2016 survey results.</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Generation of demolition and construction plant noise: Minor Adverse and Negligible Generation of demolition and construction traffic noise: Negligible Generation of demolition and construction vibration: Minor Adverse <p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> Effect of existing noise environment on internal residential noise levels: Negligible Effect of existing noise environment on proposed external amenity spaces: Negligible to Moderate Adverse Change in road traffic noise levels: Negligible Generation of plant noise: Negligible Generation of commercial noise: Minor Adverse Effect of existing vibration levels on proposed development: Negligible to Minor Adverse <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p>	<p>Updated Residual Effects</p> <p>The land use of the July 2020 amended proposed development remains consistent with that previously environmentally assessed for the updated 2017 EIA. Appendix 6 presents an update of the stand-alone noise and vibration report that accompanied the previous planning applications providing supporting evidence to the conclusions reached below.</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> In respect of the generation of demolition and construction plant noise, the July 2020 proposed amendments would not alter the demolition and construction methods and activities on-site. Accordingly, the conclusions of the assessment as reported in the updated 2017 ES would remain valid. In respect of the generation of demolition and construction traffic noise, the Applicant has confirmed a predicted increase of HGV movements to the application site during the demolition and construction stage, when compared with the May 2020 consented scheme. The higher volume of anticipated daily HGV movements during demolition and construction, taking into consideration the reduced future baseline traffic flows, would however not be significant enough to change the assessment conclusion as presented in the 2017.

¹⁵ Institute of Acoustics, ProPG, 2017, Professional Practice Guidance on Planning & Noise, CIEH

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
<p>AVO guidance witch trecommends an approach to acoustic assessments for new residential development taking consideration for acoustics, ventilation, and overheating.</p> <p>These updates do not affect the scope or methodology of the noise and vibration assessment.</p> <p>The proposed amendments and the July 2020 amended proposed development as a whole do not introduce any new issues for consideration in the updated assessment.</p>		<ul style="list-style-type: none"> • Noise from demolition and construction works (nearby sensitive receptors): Minor Adverse • Noise from demolition and construction works (all nearby noise sensitive receptors): Negligible Adverse • Vibration from demolition and construction works (on- and off-site receptors): Moderate Adverse • Demolition and construction traffic noise: Negligible • Demolition and construction vibration: Minor Adverse <p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> • Noise on internal residential spaces: Negligible • Noise on shared amenity spaces: Negligible to Minor Adverse • Noise on private balconies: Moderate Adverse • Building plant services noise: Negligible • Commercial noise breakout: Negligible • Road traffic: Negligible • Vibration levels on the proposed development: Negligible to Minor Adverse 	<p>Accordingly, the conclusions as reported in the updated 2017 ES, would remain valid.</p> <ul style="list-style-type: none"> • In respect of the generation of demolition and construction vibration, the July 2020 proposed amendments would not alter the demolition and construction methods and activities on-site. Accordingly, the conclusions of the assessment as reported in the updated 2017 ES would remain valid. <p><u>Completed Development</u></p> <ul style="list-style-type: none"> • In respect of internal residential noise levels, the overall specification of the required mitigation to the façade, glazing and ventilation remain unchanged. Accordingly, the conclusions of the updated 2017 assessment remain valid. • In respect of external amenity noise levels at shared amenity spaces and private balconies, the conclusions of the updated 2017 assessment remain valid. • In respect of road traffic noise levels, the minor change in trip generation confirmed by the transport consultant would not significantly alter noise exposure. Accordingly, the conclusions of the updated 2017 assessment remain valid. • In respect of the generation of plant noise, the recommendations and conclusions of the updated 2017 assessment would remain valid. • In respect of the generation of commercial noise, the conclusions of the updated 2017 assessment would remain valid. • In respect of the effect of existing vibration levels on proposed development, the conclusions of the updated 2017 assessment would remain valid. <p>Additional mitigation would not be required.</p>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
			<p>Accordingly, no new or amended significant noise and vibration effects are likely to arise for the July 2020 amended proposed development.</p> <p>Updated Cumulative Effects</p> <p>In respect of cumulative effects, the previously reported intra- and inter-project effects within the updated 2017 ES would remain valid, due to the location and non-material nature of cumulative scheme updates and because no new or amended significant noise and vibration effects have been reported for the July 2020 amended proposed development. There is only one exception to this which is the increase of demolition and construction road traffic noise on Juniper Crescent which increases from Negligible to Minor Adverse.</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> The proposed amendments and amended proposed development as a whole would not alter the conclusions of the updated 2017 EIA interproject cumulative assessment in respect of demolition and construction noise and vibration effects. However, the Applicant has confirmed a predicted increase of HGV movements to the site during demolition and construction stage, when compared with the consented scheme. The higher volume of anticipated daily HGV movements would result in the residual effect changing at only one road link (Juniper Crescent), increasing from Negligible to Minor Adverse. Given significant effects are those considered to be Moderate to Major Adverse and the fact that the effect would be temporary, no new or amended significant traffic effects are likely to arise for the July 2020 amended proposed development.

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
			<p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> The proposed amendments and amended proposed development as a whole would not alter the conclusions of the updated 2017 EIA interproject cumulative assessment in respect of noise in internal residential spaces, noise in shared amenity spaces, noise at private balconies; building plant services noise, commercial noise breakout, road traffic noise and vibration. <p>In the cumulative assessment scenario, additional mitigation would not be required.</p> <p>Accordingly, no new or amended significant noise and vibration effects are likely to arise for the July 2020 amended proposed development.</p>
<p><i>ES Chapter 10: Daylight, Sunlight and Overshadowing</i></p>			
<p>Since the updated 2017 EIA, the BS8206 part 2 Lighting for Buildings has been superseded by the European Standard.</p> <p>However, the European standard is not specifically referenced in the BRE Guidelines, local or regional policy in terms of methodology and approach to assessing daylight and sunlight within buildings.</p> <p>Therefore, the European Standard is not applicable for the daylight and sunlight assessment of the July 2020 amendment proposed</p>	<p>The built form conditions on-site have remained unchanged from that reported for the updated 2017 EIA.</p> <p>However, the previously assessed property 90 Camden Lock Place, has since been found to be of commercial use and therefore not considered a sensitive receptor to daylight and sunlight alterations. As such, 90 Camden Lock Place has not been considered within the assessment of the July 2020 amended proposed development.</p> <p>Whilst it is acknowledged that some of the cumulative schemes have been constructed, these</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> The magnitude of impact and so resultant likely effect in relation to the daylight and sunlight amenity, overshadowing and solar glare for the surrounding properties and amenity areas would vary throughout the demolition and construction stage, depending on the level of obstruction caused. The impact would almost certainly be less than that of the completed proposed development, given that the extent of permanent massing would increase throughout the construction stage, until the buildings are completed. <p><u>Completed Development</u></p> <ul style="list-style-type: none"> Change in Daylight levels: Negligible to minor adverse to 12 properties, minor to 	<p>Updated Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> The proposed minor increases in building height would not alter the qualitative assessment of daylight, sunlight and overshadowing to surrounding receptors during the demolition and construction stage as presented in the updated 2017 ES. As such, the magnitude of impact and so resultant likely effect in relation to the daylight and sunlight amenity, overshadowing and solar glare for the surrounding residential properties and amenity areas would vary throughout the demolition and construction stage, depending on the level of obstruction caused. The impact would almost certainly be less than that of the completed proposed development, given that the extent of permanent massing would increase throughout the construction stage, until the buildings are completed.

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
<p>development and the methodology remains unchanged from the updated 2017 ES.</p> <p>The proposed amendments and the July 2020 amended proposed development as a whole do not introduce any new issues for consideration in the updated assessment</p>	<p>have continued to be assessed as part of the cumulative scenario as agreed with LBC.</p> <p>Accordingly the baseline conditions as reported in the updated 2017 ES, with the exception of 90 Camden Lock, remains valid.</p>	<p>moderate adverse to seven properties, Moderate adverse to one property and Moderate to Major Adverse to two properties</p> <ul style="list-style-type: none"> • Changes in Sunlight levels: Negligible to Minor Adverse • Change in Overshadowing levels: Minor Adverse • Creation of Solar Glare (Train Drivers): Negligible • Creation of Solar Glare (Road Users): Negligible <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> • The construction of the new buildings on the application site would have a gradual effect upon the levels of daylight, sunlight, overshadowing and light pollution as the massing of the proposed development and cumulative schemes increase over time. <p><u>Completed Development</u></p> <p>Daylight to Surrounding Receptors:</p> <ul style="list-style-type: none"> • 54-64 Juniper Crescent: Minor Adverse to Moderate Adverse • 81 - 84 Juniper Crescent: Moderate Adverse • 101 - 103 Juniper Crescent: Moderate Adverse <p>Daylight to Surrounding Consented Residential Receptors:</p> <ul style="list-style-type: none"> • 44-44a Gloucester Avenue: Negligible 	<p><u>Completed Development</u></p> <ul style="list-style-type: none"> • The July 2020 proposed amendments include the introduction of one to two additional floors to Blocks A-C and F, as described in Section 2. • The July 2020 amended proposed development and May 2020 consented scheme are illustrated on drawings 10766/33/02/01-03 and 10766/33/03/01-03 in Appendix 7.1. These drawings highlight the minor changes in massing. • The amendments are not considered to materially alter the conclusions of the daylight, sunlight and overshadowing assessment as presented in the updated 2017 ES and explained below. <p><u>Daylight and Sunlight</u></p> <ul style="list-style-type: none"> • The daylight and sunlight results for the baseline, May 2020 consented scheme and July 2020 amended proposed development can be found within Appendix 7.2. • The proposed building increase impacts would be limited to residential receptors at Juniper Crescent. • Whilst there would be alterations in daylight and sunlight, these changes are considered negligible, and therefore not noticeable to occupants, when compared with the May 2020 consented scheme in line with the BRE Guidelines criteria. Therefore, the updated 2017 ES residual effects remain valid. <p><u>Overshadowing</u></p> <ul style="list-style-type: none"> • The overshadowing baseline, May 2020 consented scheme and July 2020 amended proposed development overshadowing results are presented in Appendix 7.3. • No significant additional overshadowing effects would occur to identified surrounding amenity spaces as a result

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
		<ul style="list-style-type: none"> • 100 Chalk Farm Road: Minor to Moderate Adverse <p>Sunlight to Surrounding Receptors:</p> <ul style="list-style-type: none"> • No cumulative sunlight effects <p>Overshadowing:</p> <ul style="list-style-type: none"> • Surrounding Amenity: Minor Adverse • Private amenities: Minor Adverse <p>Light Pollution:</p> <ul style="list-style-type: none"> • Surrounding sensitive properties: Minor Adverse 	<p>of the July 2020 amended proposed development. Whilst there would be small alterations to the percentage of area receiving two or more hours of sunlight, these changes are considered negligible when compared to the effects of the 2018 consented scheme in line with the BRE Guidelines criteria. As such, the updated 2017 ES residual effects remain valid.</p> <p>Solar Glare</p> <ul style="list-style-type: none"> • Given that there no large areas of reflective cladding as part of the July 2020 amended proposed development, which would be considered likely to give rise to significant solar reflections, solar glare has been scoped out. As such, no new solar glare assessment has been undertaken. The conclusions of the updated 2017 EIA remain valid. <p>Light Pollution</p> <ul style="list-style-type: none"> • With regard to light pollution, the assessment presented in the updated 2017 ES considered the potential for effects to 100, 100a, 100b Chalk Farm Road, which was a cumulative scheme. However, it is no longer considered relevant as the consent for 100, 100a, 100b Chalk Farm Road has lapsed and this scheme is no longer considered a sensitive receptor to light pollution. Therefore, light pollution has been scoped out. As such, no new light pollution assessment has been undertaken. The conclusions of the updated 2017 ES are no longer a consideration. <p>Updated Cumulative Effects</p> <ul style="list-style-type: none"> • In terms of cumulative effects, as mentioned above 100, 100a, 100b Chalk Farm Road was considered in the cumulative scenario within the updated 2017 ES. However, the consent for this scheme has lapsed and as such the cumulative effects in relation to daylight,

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
			<p>sunlight and overshadowing as reported in the updated 2017 ES are no longer applicable.</p> <ul style="list-style-type: none"> • Owing to the relative distance, scale and/or planning status, all other cumulative schemes listed in Table 4, including those which have been built out, are not considered likely to generate additional daylight, sunlight or overshadowing effects to surrounding sensitive receptors. • No new schemes have come forward with the potential to generate cumulative effects in combination with the July 2020 amended proposed development. • Additionally, the July 2020 amended proposed development is too far from all cumulative schemes identified in Table 1 and, as such, the daylight and sunlight within these buildings are not likely to be significantly affected. <p>Daylight, Sunlight and Overshadowing Amenity within July 2020 Amended Proposed Development</p> <ul style="list-style-type: none"> • The internal daylight, sunlight and overshadowing amenity of the July 2020 amended proposed development is assessed and reported within Appendix 7.4. It concludes that the July 2020 amended proposed development would retain daylight and sunlight levels in line with or not significantly worse than those of the May 2020 consented scheme, providing future occupants with access to good levels of natural light. • With regard to overshadowing, all publicly accessible open space, communal areas and roof terraces would retain sunlight levels in line with or not significantly worse than those of the May 2020 consented scheme, providing excellent amenity overall. <p>Appendix x also considers the daylight impacts of the building height increases on the Blocks D, E1 and E2. The</p>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
			results of these tests show no material alterations to the levels of amenity of the consented scheme.
<i>Chapter 11: Wind</i>			
<p>The July 2020 amended proposed development would not affect the scope and assessment methodology of the 2017 Wind Microclimate assessment.</p> <p>No new or updated wind assessment guidance pertinent to the July 2020 amended proposed development has been published since the updated 2017 EIA.</p>	<p>The baseline scenario was previously assessed (wind tunnel tested) as part of the 2017 EIA. The baseline assessment and results presented in the 2017 EIA remains valid for the current July 2020 amended proposed development.</p>	<p>Wind tunnel testing of the following scenarios was undertaken in 2017:</p> <ul style="list-style-type: none"> • Configuration 1: Proposed Development with Existing Surrounding Buildings; and • Configuration 2: Proposed Development with Cumulative Surrounding Buildings. <p>A qualitative assessment was undertaken of the landscaping scheme prepared by Gillespies LLP and recommendations made in respect of additional mitigation measures that would be required at the detailed design stage. Residual effects were concluded on this basis.</p> <p>Mitigation measures comprised the following:</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> • None. <p><u>Completed Development</u></p> <ul style="list-style-type: none"> • Indicative landscaping scheme provided by Gillespies LLP; • Localised soft/hard landscaping or recessing of entrances by 1.5 m; • Localised landscaping features around seating areas such as shrubs in planters, small trees, porous screens, sculptures and artwork; and • Replacing railing balustrades with solid balustrades. <p>Summary of Residual Effects</p>	<p>Updated Residual Effects</p> <p>Updated wind tunnel tests have been undertaken for the July 2020 amended proposed development as a whole to provide an updated wind assessment that includes the increased massing of several blocks (A, B, C and F). The probe locations were modified for the July 2020 amended proposed development as the model have been updated and rebuilt and to account for the updated landscape scheme.</p> <p>The July 2020 Wind Assessment Report is provided in Appendix 8 of this EIL, with the key conclusions summarised below.</p> <p>The wind tunnel testing was undertaken of the following scenarios:</p> <ul style="list-style-type: none"> • Configuration 1: Proposed Development with Existing Surrounding Buildings • Configuration 2: Proposed Development with Cumulative Surrounding Buildings; and • Configuration 3: Proposed Development with Existing Surrounding Buildings and Proposed Landscaping. <p>The updated landscape scheme provided by Murdoch Wickham (1573-013A Tree Planting Strategy) was tested as part of Configuration 3.</p> <p>As no updated wind tunnel testing was undertaken in January 2020, the assessment update makes reference to the 2017 EIA/ES.</p> <p>Consistent with the approach adopted in the 2017 EIA/ES consideration has been given to additional mitigation</p>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
		<p><u>Demolition and Construction</u></p> <p>Negligible</p> <p><u>Completed Development</u></p> <p>The summary below is for Configuration 2, taking into consideration the qualitative assessment of the landscaping scheme and additional qualitative mitigation measures.</p> <p>Comfort</p> <ul style="list-style-type: none"> • Wind conditions at off-site bus stops suitable for standing: None (the summary Table incorrectly stated Negligible to Minor Beneficial) • Wind conditions at off-site residential amenity space suitable for sitting: Negligible • Wind conditions at thoroughfares suitable for sitting to strolling use (windiest season): Negligible to Moderate Beneficial • Wind conditions at entrances suitable for sitting to strolling use (windiest season): Negligible to Minor Beneficial - Subject to development of appropriate mitigation strategy through further testing • Wind conditions at ground level amenity spaces suitable for sitting use (summer season): Negligible - Subject to development of appropriate mitigation strategy through further testing • Wind conditions at roof terraces suitable for sitting use (summer season): Negligible – 	<p>measures that would be required at the detailed design stage. Residual effects have been concluded on this basis.</p> <p><u>Demolition and Construction</u></p> <p>As per the 2017 EIA, the wind microclimate within and around the application site would be expected to approach the conditions reported for the completed July 2020 amended proposed development. Off-site wind conditions would remain suitable for the intended use. Accordingly, the Negligible conclusion of the 2017 EIA remains valid.</p> <p><u>Completed Development</u></p> <p>The conclusions below focus on Configurations 3 as the landscaping scheme is considered to be embedded mitigation. The results of Configuration 1 are presented in Appendix 8.</p> <p>Comfort</p> <ul style="list-style-type: none"> • Wind conditions at off-site bus stops suitable for standing: None. Accordingly, the conclusions of the 2017 EIA remain valid. • Wind conditions at off-site residential amenity space suitable for sitting: Negligible. Accordingly, the conclusions of the 2017 EIA remain valid. • Wind conditions at thoroughfares suitable for sitting to strolling use (windiest season): Negligible to Moderate Beneficial. Subject to appropriate mitigation strategy through further testing of probe location 173. • Wind conditions at entrances suitable for sitting to strolling use (windiest season): Negligible to Minor Beneficial. Accordingly, the conclusions of the 2017 EIA remain valid. • Wind conditions at ground level amenity spaces suitable for sitting to standing use (summer season): Negligible. Subject to appropriate mitigation strategy through

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
		<p>Subject to development of appropriate mitigation strategy through further testing</p> <ul style="list-style-type: none"> • Wind conditions at balconies suitable for sitting to standing use (summer season): Negligible - Subject to development of appropriate mitigation strategy through further testing <p>Strong Winds</p> <ul style="list-style-type: none"> • Two occurrences of strong winds exceeding the 15 m/s for more than 2.2 hours per year on the roof terrace of the PFS Block (193 and 195); however, access would only be required for plant maintenance. <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <p>Negligible</p> <p><u>Completed Development</u></p> <p>Comfort</p> <ul style="list-style-type: none"> • Wind conditions at off-site bus stops suitable for standing: None • Wind conditions at off-site residential amenity space suitable for sitting: Negligible • Wind conditions at thoroughfares suitable for sitting to strolling use (windiest season): Negligible to Moderate Beneficial • Wind conditions at entrances suitable for sitting to strolling use (windiest season): Negligible to Minor Beneficial, Minor Adverse at probe locations 134, 161, 163, 165 and 168 	<p>further testing of probe locations 112 (2017 EIA probe location 164) and 128.</p> <ul style="list-style-type: none"> • Wind conditions at roof terraces suitable for sitting to standing use (summer season): Negligible. Subject to appropriate mitigation strategy through further testing of probe locations 199 (2017 EIA probe location 220) and 242 (2017 EIA probe location 193). As the roof terrace of the PFS Block (represented by probe location 242) is only accessible for maintenance use, no mitigation measures would be required. However, probe location 199 would require mitigation. • Wind conditions at balconies suitable for sitting to standing use (summer season): Negligible. Accordingly, the conclusions of the 2017 EIA remain valid. <p>Strong Winds</p> <ul style="list-style-type: none"> • Two occurrences of strong winds exceeding the 15m/s threshold for more than 2.2 hours per year on the roof terrace at probe location 242 (2017 EIA probe location 193) and at the ground level north-west corner of the PFS Block (probe location 173). As probe location 173 would be accessible by pedestrians, appropriate mitigation would be required. <p>The incorporation of the proposed landscaping strategy would improve comfort conditions on-site when compared to Configuration 1; however, the July 2020 amended proposed development would require additional mitigation measures in addition to the proposed landscaping scheme at four probe locations (112, 128, 173, 199).</p> <p>Additional mitigation proposals have been made below based on professional judgement and experience. The final mitigation strategy would be confirmed through further wind tunnel testing to be secured by means of an appropriately worded planning condition.</p>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
		<ul style="list-style-type: none"> • Wind conditions at ground level amenity spaces suitable for sitting use (summer season): Negligible, Minor Adverse at probe locations 164, 167, 186 and 226 • Wind conditions at roof terraces suitable for sitting use (summer season): Negligible, Minor Adverse at 207, 213, 220, 226 and 238. • Wind conditions at balconies suitable for sitting to standing use (summer season): Negligible <p>Strong Winds:</p> <ul style="list-style-type: none"> • At locations 116, 193, 195 and 122, although the additional mitigation measures would address these exceedances. 	<p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> • None. <p><u>Complete and Operational</u></p> <p>Ground Level:</p> <ul style="list-style-type: none"> • Probe locations 112 (2017 EIA probe location 164) and 128: Dense planting such as hedging or shrubs (1.5m in height, 1.5m wide) placed towards the south-western side and north-eastern side of those seating locations. Alternatively, solid or 50% porous screens of the same size placed at the same locations would improve wind conditions. • Probe location 173: Two deciduous trees 6 m tall placed at two sides of the north-west corner of the PFS Block or alternatively adding shrubs (1.5m high, 1.5m wide) to restrict pedestrian movements around the building corner. If hard landscaping elements are preferred, a 50% porous screen 1m² in size placed tangent to the corner or the addition of sculptures of the same dimensions, way finders of similar size would improve wind conditions at the corner. • Probe location 199: Dense planting such as hedging or shrubs (1.5m in height, 1.5m wide) placed on two sides of seating areas to provide localised shelter. Alternatively, the use of 50% porous screens of similar size would improve wind conditions. • Probe location 242: No mitigation measures required at this location as it is only accessible for maintenance use. <p>With these wind mitigation measures in place, wind conditions would be expected to improve such that these locations would be safe and suitable for the intended</p>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
			<p>pedestrian use. All locations would therefore have Negligible or Minor to Moderate Beneficial residual effects. Wind tunnel testing would be undertaken to quantitatively confirm the effectiveness of these wind mitigation measures and ensure a safe and suitable wind environment is achieved.</p> <p>Summary of Cumulative Effects</p> <p>Intra-cumulative Wind Microclimate effects have been assessed through additional wind tunnel testing and would likely arise as indicated in the 2017 EIA.</p> <p>The results of the cumulative assessment are summarised below.</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> • Negligible. Accordingly, the conclusions of the 2017 EIA remain valid. <p><u>Completed Development</u></p> <p>Comfort</p> <ul style="list-style-type: none"> • Wind conditions at off-site bus stops suitable for standing: None. Accordingly, the conclusions of the 2017 EIA remain valid. • Wind conditions at off-site residential amenity space suitable for sitting: Negligible. Accordingly, the conclusions of the 2017 EIA remain valid. • Wind conditions at thoroughfares suitable for sitting to strolling use (windiest season): Negligible to Moderate Beneficial. Accordingly, the conclusions of the 2017 EIA remain valid. • Wind conditions at entrances suitable for sitting to strolling use (windiest season): Negligible to Minor Beneficial, Minor Adverse at probe locations 111 (2017 EIA probe location 163). Accordingly, the conclusions of the 2017 EIA remain valid.

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
			<ul style="list-style-type: none"> • Wind conditions at ground level amenity spaces suitable for sitting use (summer season): Negligible, Minor Adverse at probe locations 112 (2017 EIA probe location 164), 115 (2017 EIA probe location 167), 128 (2017 EIA probe location 159) and 129. Accordingly, the conclusions of the 2017 EIA remain valid, with the exception of locations 129 and 159. • Wind conditions at roof terraces suitable for sitting use (summer season): Negligible. Accordingly, the conclusions of the 2017 EIA remain valid or improved. • Wind conditions at balconies suitable for sitting to standing use (summer season): Negligible. Accordingly, the conclusions of the 2017 EIA remain valid. <p>Strong Winds:</p> <p>No instances of strong winds would occur with the cumulative schemes built out.</p> <p>The scheme at 100 Chalk Farm Road to the west would provide shelter thus removing the safety exceedances at probe locations 173 and 242. It is expected that if this development is to be built before the July 2020 amended proposed development, no mitigation measures would be required at this location. However, as the consent of this scheme has lapsed, it is not certain that this scheme would be delivered. In any event, the July 2020 amended proposed development is required to deliver acceptable conditions on-site without reliance on cumulative schemes.</p> <p>It is expected that with the wind mitigation measures discussed above in place, wind conditions would improve such that these locations would be safe and suitable for the intended pedestrian use. All locations would therefore have Negligible and Minor to Moderate Beneficial residual cumulative effects.</p>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
			<p>The scheme at 100 Chalk Farm Road to the west would provide shelter thus removing the safety exceedances at probe locations 173 and 242. It is expected that if this development is to be built before the July 2020 amended proposed development, no mitigation measures would be required at this location. However, as the consent of this scheme has lapsed, it is not certain that this scheme would be delivered. In any event, the July 2020 amended proposed development is required to deliver acceptable conditions on-site without reliance on cumulative schemes.</p>
<p><i>Volume 2A: Townscape and Visual Impact Assessment</i></p>			
<p>No new or updated townscape and visual impact assessment guidance has been published since the updated 2017 EIA.</p> <p>The proposed amendments and the July 2020 amended proposed development as a whole do not introduce any new issues for consideration in the updated assessment</p>	<p>The built form conditions on-site have remained unchanged from that reported for the updated 2017 EIA.</p> <p>Whilst some of the cumulative schemes have been built and /or are under construction within the study area, these schemes have been considered as part of the cumulative scenario as agreed with the LBC.</p> <p>Accordingly the baseline conditions as reported in the updated 2017 ES, remains valid.</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Views: None to Major Adverse Townscape Character Areas (TCAs): None to Major Adverse <p><u>Completed Development</u></p> <p>Views:</p> <ul style="list-style-type: none"> One Major Beneficial Five Moderate Beneficial One Minor Beneficial One Major Neutral Nine Moderate Neutral 12 Minor Neutral Seven Negligible One Minor Adverse <p>TCAs:</p> <ul style="list-style-type: none"> One Minor Beneficial Four None 	<p>Updated Residual Effects</p> <p><u>Demolition and Construction</u></p> <p>The demolition and construction effects are likely to be the same as those presented in the updated 2017 ES due to the similar nature and degree of works involved.</p> <p><u>Completed Development</u></p> <p>Appendix 9 shows the updated Verified Views of the July 2020 amended proposed development in all of the views assessed in the updated 2017 EIA. The July 2020 amended proposed development has been tested in key views during the design development process and the design has evolved to remove or reduce any potential adverse effects as far as possible.</p> <p>The footprint, orientation and architectural character of each building would be essentially unchanged from the consented development, with only a slight reduction to the internal courtyards of Blocks B and F which is not noticeable in the views).</p> <p>The July 2020 amended proposed development includes a reduction of floor to floor heights and the reconfiguration of internal layouts which would be reflected in the external</p>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
		<ul style="list-style-type: none"> • Five Negligible <p>Summary of Cumulative Effects</p> <ul style="list-style-type: none"> • The visual and townscape effects would be neutral or positive in all cases 	<p>appearance of the buildings in the views. There would be very limited changes to materials. These amendments are shown in the rendered representations of the July 2020 amended proposed development in the updated Verified Views. These amendments to the overall appearance of the buildings in the views would be negligible. There would be no significant change to the views or townscape character as a result of this aspect of the proposals.</p> <p>There would be a perceptible difference to some of the building heights in the views. There would also be a change to the size and height of the plant screens which would be visible in certain views. A more detailed assessment in relation to the amended building heights is provided in the introduction to Appendix 9.</p> <p>The updated Verified Views show that the proposed building heights would amount to a negligible change to the extent of the visibility of the May 2020 consented scheme.</p> <p>The precise skyline profile of the July 2020 amended proposed development would differ from the May 2020 consented development, but to a very minor degree. The principles and arrangement of the massing would remain the same as in the May 2020 consented scheme.</p> <p>The July 2020 amended proposed development would have no or negligible visibility in all views in which the June 2018 consented development had no or negligible visibility.</p> <p>The overall massing of the completed and operational July 2020 amended proposed development would remain consistent with that previously environmentally assessed for the updated 2017 EIA.</p> <p>Additional mitigation would not be required.</p> <p>Accordingly, no new or amended significant townscape and visual effects are likely to arise for the July 2020 amended proposed development.</p>

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
			<p>Updated Cumulative Effects</p> <p>In respect of cumulative effects, the previously reported intra- and inter-project effects within the updated 2017 ES would remain valid. The two additional cumulative schemes shown in the updated Verified Views (2-6 St Pancras Way and the St Pancras Commercial Centre) do not introduce any significant cumulative effects beyond those reported in the updated 2017 ES.</p>
<i>Volume 2B: Built Heritage</i>			
<p>Since the updated 2017 EIA there has been the new guidance published available for use for the assessment methodology:</p> <ul style="list-style-type: none"> Historic England published the Second Edition of 'Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets' in December 2017¹⁶. This document replaces the First Edition (published in 2015), as well as 'Seeing the History in the View: A Method for Assessing Heritage Significance 	<p>A review of the National Heritage List for England, and the Council's website, confirms that no additional built heritage assets have been identified within the study area, as described for the built heritage assessment in the updated 2017 ES. Accordingly, the baseline conditions set out in the updated 2017 EIA remains valid for this review.</p>	<p>Summary of Residual Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> Conservation Areas: Moderate Adverse to Minor Adverse Statutorily listed buildings: Moderate Adverse to Negligible Registered parks and gardens: Moderate Adverse Locally listed buildings: Minor Adverse <p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> Conservation areas: one Negligible, one Neutral, one Minor Adverse and one Moderate Adverse. Statutorily listed buildings: 11 Negligible, 20 Neutral and five Minor Adverse Registered parks and gardens: Moderate Adverse 	<p>Updated Residual Effects</p> <p>A Heritage Statement Addendum has been prepared as an Appendix 10 to this EIL and provides a proportionate assessment of the impacts of the July 2020 amended proposed development on the significance of the relevant built heritage assets.</p> <p>It is only the amendments to the proposed heights of Blocks A1, A2, B, C and F2 and changes to the proposed landscaping that would have implications for the impacts on the significance of the relevant built heritage assets as part of the July 2020 amended proposed development.</p> <p>The proposed targeted and minor increases in height of these blocks would not give rise to any new or amended effects reported within the updated 2017 ES.</p> <p><u>Demolition and Construction</u></p> <p>The June 2020 amended proposed development proposes no changes to the demolition and construction stage of relevance to the heritage assessment.</p>

¹⁶ Historic England, 2017. Good Practice Advice Note 3: The Setting of Heritage Assets (Second Edition).

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
<p>within Views’ (published in 2011)¹⁷. The Second Edition does not materially change the approach to understanding the significance of the relevant heritage assets, including the contribution made by setting to that significance.</p> <ul style="list-style-type: none"> Historic England published the Second Edition of their Advice Note 1 Conservation Area Appraisal, Designation and Management in 2019¹⁸. The revised guidance does not materially change the approach to the assessment of the significance of conservation areas. <p>These updated documents would not affect the scope or methodology for the built heritage assessment.</p> <p>The July 2020 proposed amendments and the July 2020 amended proposed</p>		<ul style="list-style-type: none"> Locally listed buildings: 12 Negligible, 12 Neutral and one Minor Beneficial <p>Summary of Cumulative Effects</p> <p><u>Demolition and Construction</u></p> <ul style="list-style-type: none"> None <p><u>Complete and Operational</u></p> <ul style="list-style-type: none"> Neutral 	<p><u>Complete and Operational</u></p> <p>The previously assessed impacts on the significance of the relevant built heritage assets, arising from changed relationships and contrasts associated with built form on the application site as new elements of their respective settings, would not be materially changed as a result of the targeted, minor increase in building heights as part of the June 2020 amended proposed development.</p> <p>Where those new relationships were previously reported in the updated 2017 EIA as causing harm/having an adverse effect on the significance of a small number of heritage assets, the June 2020 amended proposed development would amplify those impacts to a minor degree; however, given that the proposed increases in the height of Blocks A, B, C and F are comparatively minor amendments in the context of the scale of change on the application site and previously consented new built form, there would be no change in the overall reported residual effects on the particular significance of the following built heritage assets:</p> <ul style="list-style-type: none"> The Roundhouse (Grade II* listed building); The Interchange Building (Grade II listed building); Nos.1-15 Prince Albert Road (Grade II listed buildings); Primrose Hill Infants School (Grade II listed building); The Engineer PH (Grade II listed building); Primrose Hill Conservation Area; Harmood Conservation Area; and Regent’s Park (Grade I Park and Garden of Special Historic Interest). <p>Additional mitigation would not be required.</p>

¹⁷ English Heritage, 2011. Seeing the History in the View: A Method for Assessing Heritage Significance within Views

¹⁸ Historic England, 2019. Advice Note 1: Conservation Area Appraisal, Designation and Management (Second Edition).

Table 5: Environmental Implications of July 2020 Proposed Amendments

Assessment Methodology	Baseline Conditions	Conclusions of Updated 2017 ES	Updated Assessment of July 2020 Amended Proposed Development
<p>development, as a whole, do not introduce any new issues for consideration in the updated assessment.</p> <p>A Heritage Statement Addendum has been prepared as Appendix 10 to this EIL and provides a proportionate assessment of the impacts of the July 2020 amended proposed development on the significance of the relevant built heritage assets.</p>			<p>Accordingly, no new or amended significant built heritage effects are likely to arise for the June 2020 amended proposed development.</p> <p>Updated Cumulative Effects</p> <p>In respect of cumulative effects, the previously reported intra- and inter-project effects within the updated 2017 ES would remain valid, due to the non-material nature of cumulative scheme updates and because no new or amended significant built heritage effects have been reported for the June 2020 amended proposed development.</p>

Cumulative Effects

Only two of the updated 2017 EIA/ES conclusions (secondary school place provisioning and on-site open space provisioning) have been amended by the July 2020 amended proposed development. The minor, and non-significant nature of these changes would not alter the conclusions of the intra-project cumulative effects assessment as presented in the updated 2017 ES.

Only one of the updated 2017 EIA/ES inter-project cumulative assessment conclusions have been amended in respect of temporary demolition and construction noise effects on Juniper Crescent. The update is minor and not significant.

Residual Effects

The following changes in the residual effects have been reported in respect of Socio-Economics and Wind:

- A change in secondary school capacity, with a resulting change in effect from **Minor Adverse** to **Negligible**, despite the predicted increase in secondary school child yield (69 vs 60 predicted in 2017).
- A change in the level of on-site open space provision, with the June 2020 amended proposed development to provide 95 % of the required provision for the new residential population. The effect would therefore change from **Minor Beneficial** to **Negligible**.
- The inclusion of the proposed landscaping strategy to the scheme would provide beneficial shelter to the July 2020 amended proposed development although would not mitigate all locations. Five locations would remain windier than required for their intended use (112, 128, 173, 199 and 242). In addition, two safety exceedances would occur at locations 173 and 242. Based on professional judgement and experience, the wind specialist has proposed additional landscaping features, described within the technical report, to be placed locally around these locations, which are expected to improve and make wind conditions safe and suitable for the intended use. Mitigation would not be required at location 242.

On this basis residual effects are expected to be **Negligible** and **Minor to Moderate Beneficial**. Consistent with the approach adopted for the consented scheme, the final mitigation strategy would be confirmed through further wind tunnel testing to be secured by means of an appropriately worded planning condition.

Accordingly, no new or amended significant environmental effects have been reported for the June 2020 amended proposed development.

6. Summary and Conclusion

This S73 application seeks to amend the consented proposals for the MS parcel of the May 2020 consented scheme. Due to the minor nature of the January 2020 proposed amendments, the updated EIA has concluded that only three of the previously reported updated 2017 EIA/ES conclusions would be affected, but only to a minor degree. No new or amended significant environmental effects would arise.

Should you or any of the consultees have any questions for clarification, please do not hesitate to contact Michelle Wheeler at Ramboll.

Yours sincerely



Michelle Wheeler

Senior Consulting Manager
Impact Assessment
D +44 207 808 1423
M +44 7921 058107
mwheeler@ramboll.com

Encl. Appendix 1, Scoping Opinion Request Letter
 Appendix 2, London Borough of Camden Scoping Opinion Response
 Appendix 3, Socio-Economics ES Chapter Addendum
 Appendix 4, Transport Assessment Addendum
 Appendix 5, Air Quality Assessment Addendum
 Appendix 6, Noise and Vibration Assessment Addendum
 Appendix 7.1, Daylight, Sunlight and Overshadowing Massing Drawings
 Appendix 7.2, Daylight and Sunlight Results
 Appendix 7.3, Overshadowing Results
 Appendix 7.4, Internal Daylight, Sunlight and Overshadowing Report
 Appendix 8, Wind Assessment Report
 Appendix 9, Townscape and Visual Impact Assessment Addendum
 Appendix 10, Built Heritage Assessment Addendum

Appendix 1

Scoping Opinion Request Letter

Appendix 2

London Borough of Camden Scoping Opinion Response

Appendix 3:

Socio-Economics ES Chapter Addendum

Appendix 4
Transport Assessment Addendum

Appendix 5

Air Quality Assessment Addendum

Appendix 6
Noise and Vibration Assessment Addendum

Appendix 7.1

Daylight, Sunlight and Overshadowing Massing Drawings

Appendix 7.2

Daylight and Sunlight Results

Appendix 7.3

Overshadowing Results

Appendix 7.4

Internal Daylight, Sunlight and Overshadowing Report

Appendix 8
Wind Assessment Report

Appendix 9
Townscape and Visual Impact Assessment Addendum

Appendix 10

Built Heritage Assessment Addendum