

Appendix 1

Scoping Opinion Request Letter

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

[sent via email]

Dear Gavin

**INFORMAL EIA SCOPING REQUEST: PROPOSED SECOND SECTION 73
MINOR MATERIAL AMENDMENT TO PLANNING CONSENT 2020/0034/P
FOR CAMDEN GOODS YARD, CAMDEN**

Date 24/03/2020

We write to you on behalf of our Client, St George Plc (the 'Applicant') regarding the proposed second 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 proposed second S73 MMA application will be submitted in June 2020 (the 'June S73 application') and will seek to amend the full planning consent (planning reference: 2017/3847/P) granted in June 2018 (the 'June 2018 Consented Scheme') as amended by the first S73 MMA application (planning reference: 2020/0034/P) anticipated to be granted by the end of March 2020 (the 'March 2020 Consented Scheme').

Ref L1620008029_4_Camden
Goods Yard Phase 2A S73
Scope.docx

The proposed amendments for the second S73 MMA application relate to the Morrisons Supermarket (MS) Parcel of March 2020 Consented Scheme.

The June 2018 Consented Scheme was subject to an Environmental Impact Assessment (EIA), which was reported within an Environmental Statement (ES). The EIA was updated in 2019 for the first S73 MMA application and the conclusions reported in an Environmental Implications Letter (EIL) for the March 2020 Consented Scheme.

The purpose of this letter is to request an informal EIA Scoping Opinion from the London Borough of Camden (LBC) as the 'relevant planning authority', on the scope of supplementary environmental information to accompany the June 2020 S73 application, as well as reporting format.

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Registered Office:
240 Blackfriars Road
London
SE1 8NW

1. Project Background

In June 2017 a full planning application (ref: 2017/3847/P), was submitted by Safeway Stores Limited and BDW Trading Limited 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); retail (787 m² GEA); community centre (86 m² GEA); and an urban farm (1,298 m² GEA); and
- Morrisons Petrol Filling Station (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').

Subsequent to the grant of planning permission, the following applications have been submitted to the LBC between January 2019 and July 2019 for non-material amendments to the June 2018 Consented Scheme:

- 06 February S96A 2019 application to make minor changes to the wording of planning conditions 47, 48 and 49 [2019/0153/P].
- 04 July 2019 S96A application to make minor changes to planning conditions 29, 50 and 60 [2019/2962/P].

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

St George Plc was subsequently selected by Morrisons to deliver the June 2018 Consented Scheme and has been making minor amendments to the June 2018 Consented Scheme.

In December 2020, St George Plc 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 the first S73 MMA application (planning ref. 2020/0034/P; the 'January 2020 S73 MMA application') relating to the PFS Parcel which is expected to be granted planning permission by the end of March 2020. The amendments to the PFS Parcel were in respect of the construction start date; the construction method of the temporary store; the operation period of the temporary store; car parking provision and delivery access arrangements.

Due to the minor material nature of the amendments, the 2017 EIA was updated and reported on in the form of an EIL (the 'January 2020 EIL'), also referred to as a Statement of Compliance (SoC), which should be read alongside the 2017 EIA/ES. The January 2020 EIL presented the updated environmental effects of the proposed amendments and of the amended proposed development as a whole (the 'January 2020 amended proposed development').

Therefore, this letter refers to the original 2017 EIA/ES as updated by the January 2020 EIL, and the March 2020 Consented Scheme, which is the most current consented scheme.

2. Proposed Amendments

Whilst the scheme proposals are still subject to evolution and refinement and consultations with the LBC, the June 2020 S73 MMA application is likely to seek the following proposed amendments (collectively referred to as the 'June 2020 proposed 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 layout to account for the following:
 - Introduction of a pool, gym and associated facilities beneath Block A;
 - Reduction in car parking spaces from 300 to 250; and
 - Potential relocation of energy centre within the basement (to be confirmed).
- Introduction of one to two additional floors to Blocks A-C and F as follows:
 - Block A1 to increase from 14 to 15 floors (approximately 0.45 m increase from 84.17 mAOD to 84.800 mAOD excluding plant enclosure and 86.700 mAOD including plant enclosure);
 - Block A2 to increase from 11 to 13 floors (approximately 4.26 m increase from 74.05 mAOD to 78.500 mAOD excluding plant enclosure and 80.400 mAOD including plant enclosure);
 - Block B to increase from 7 to 8 floors (approximately 2.02 m increase from 67.100 mAOD to top of proposed urban farm to 69.575 mAOD to top of proposed urban farm);
 - Block C to increase from 8 to 9 floors at the edge of the application site (approximately 1.57 m from 64.125 m AOD to 65.700 m AOD); and 10 to 12 floors to the tallest part of the block set back from the application site boundary (approximately 3.91 m from 71.250 mAOD to 75.160 mAOD); and
 - Block F2 to increase from 9 to 11 floors (approximately 6.50 m increase from 67.315 mAOD to 73.815mAOD) at the section of the block set back from the application site boundary.
- Delivery of up to 80 additional residential units to the 573 residential units consented with an associated update in the unit and tenure mix;
- Increase in the depth of blocks by approximately 1-2.5 m and consequently reduction in courtyard footprints;
- Increase in the provision of play space to account for the potential increased child yield;
- Enhanced landscaping through a new design approach comprising increased tree planting and areas of soft landscaping; and
- Update of Energy Strategy to comprise Air Source Heat Pumps and gas fired boilers.

There would be no amendments to the remainder blocks (E1, E2 and D) on the MS Parcel or PFS Parcel, or to other elements of the consented scheme such as the ventilation, access and servicing, drainage, waste, material and façade design and construction programme.

The March 2020 Consented Scheme, as amended by the June 2020 S73 MMA application, is hereafter referred to as the 'June 2020 amended proposed development'.

3. Proposed Approach

The approach to be adopted for assessing and validating the likely significant environmental effects of the amended proposed development as a whole (the 'June 2020 amended proposed development') is consistent with the approach agreed with the LBC for the January 2020 S73 MMA application.

3.1 EIA Regulations

The June 2018 Consented Scheme was scoped and assessed under the 2011 EIA Regulations (as amended in 2015). During the preparation of the 2017 ES, the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the '2017 EIA Regulations') were published.

Part 12, Regulation 76(2a) of the 2017 EIA Regulations sets out transitional arrangements, such that the 2011 EIA Regulations (as amended in 2015) continue to apply where a project has been subject to EIA or has been scoped before the commencement of the 2017 EIA Regulations.

The June 2020 proposed amendments falls under Schedule 2, Regulation 13(a) of the 2011 EIA Regulations (as amended in 2015) and the 2017 EIA Regulations, which states: *"Any change to or extension of development of a description listed in paragraphs 1 to 12 of column 1 of this table, where that development is already authorised, executed or in the process of being executed"*.

Therefore, appropriate supplemental environmental information has to accompany the S73 MMA application to report on the likelihood for the June 2020 amended proposed development as a whole (not the June 2020 proposed amendments in isolation) to give rise to any new or amended significant environmental effects when compared to the 2017 EIA/ES conclusions as updated by the January 2020 EIL.

3.2 Reporting Format for Supplemental Environmental Information

The team of EIA technical specialists will undertake an updated EIA of the June 2020 amended proposed development as a whole.

To acknowledge the minor material nature of the proposed amendments and to ensure a proportionate approach, the results of the updated EIA will again be reported within an EIL. Assessment results will be presented in tabular format and may be supplemented by technical notes as necessary.

3.3 Scope of Environmental Impacts and Effects

The June 2020 proposed amendments and the June 2020 amended proposed development as a whole, would not materially alter the nature and scale of the March 2020 Consented Scheme and are therefore unlikely to introduce any new potential impacts or likely effects over and above those previously scoped and considered in the 2017 EIA as updated by the January 2020 EIL. Accordingly, the scope of the environmental topics previously considered, are considered to remain valid.

In respect of the remaining topics previously scoped out of the 2017 EIA and January 2020 EIL, the following is noted:

- Ground Conditions: The remediation strategy prepared for the June 2018 consented scheme remains valid and the written detailed scheme of assessment of land contamination was undertaken

in June 2019 to discharge planning condition 61B, which was granted by the LBC in June 2019 (planning reference: 2019/3105/P). The written detailed scheme of assessment references the approach to discharging subsequent planning conditions for remediation and verification and the overall approach would not be altered by the proposed amendments.

- Ecology: A Preliminary Bat Roost Assessment was undertaken in November 2019 to discharge planning condition 54, which was granted by the LBC in December 2019. The report confirms the site conditions remain as previously reported. No evidence of bats was recorded and as such the assessment rules out the reasonable likelihood of bat roost being present. The proposed amendments now under consideration would not alter the previous conclusion that significant effects are unlikely to arise in respect of ecology.
- Flood Risk: The EA flood designation and drainage strategy presented in the 2017 ES remain valid. The proposed amendments now under consideration would not alter the previous conclusion that significant effects are unlikely to arise in respect of water resources and flood risk.
- Archaeology: A Written Scheme of Investigation for an archaeological watching brief was undertaken in April 2019 to discharge planning condition 50, which was granted by the LBC in July 2019 (planning reference: 2019/2368/P). The archaeological mitigation strategy has subsequently been agreed with the LBC and GLAAS. This mitigation strategy comprises a watching brief and would not be altered by the proposed amendments.

The updated EIA would be undertaken in accordance with the 2011 EIA Regulations (as amended in 2015). The 2017 EIA Regulations introduced additional environmental topics for applicants to consider and assess for qualifying EIA Developments, namely climate change, health, and major accidents and disasters. The June 2020 amended proposed development as a whole is unlikely to give rise to significant environmental effects in respect of these environmental topics by virtue of its nature, scale, location and design proposals. Appropriate justification will be provided within the EIL to accompany the June 2020 S73 application.

3.4 Proposed Environmental Assessment Scope

The proposed environmental assessment scope for the June 2020 amended proposed development will be based upon the technical scope of the 2017 EIA as updated by the January 2020 EIL. The updated EIA will comprise the following:

- Review of the June 2020 proposed amendments;
- Review of validity of the baseline;
- Review of relevant legislation, policy and guidance; and
- Consideration of an updated list of cumulative schemes.

Table 1 presents a summary of the environmental assessment scope for the June 2020 amended proposed development.

Table 1: Summary of Environmental Assessment Scope

Element	Summary Scope of Updates
Baseline	All technical topics will review the current baseline against the baseline that was used for the 2017 EIA and the January 2020 EIL. If necessary, technical topics will update the baseline through a desk-top study and/or site survey(s).
Legislation	All technical topics will review any relevant updated, new or emerging legislation and national policy that have arisen since the 2017 EIA and January 2020 EIL and how this may affect the assessment scopes.
Policy	All technical topics will review any relevant updated, new or emerging planning policy that has arisen since the 2017 EIA and January 2020 EIL.
Guidance	All technical topics will review any relevant updated, new or emerging assessment guidance that has arisen since the 2017 EIA and January 2020 EIL.
Assessment Scope	<p>Based on feedback received from EIA technical specialists and consistent with the topics scoped within the 2017 EIA, the following assessments are proposed to be updated:</p> <ul style="list-style-type: none"> • Socio-Economics, limited to impacts on population/child yield, education, health facilities and open/play space; • Transport and Accessibility, limited to impacts on trip generation and associated impacts on the road network and public transport; • Air Quality, limited to impacts from transport emissions and plant emissions; • Noise and Vibration, limited to impacts from transport emissions and plant emissions; • Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution, limited to daylight, sunlight and overshadowing impacts to neighbouring residential properties as no amended effects are expected in respect of solar glare and light pollution. Although not an EIA matter, an updated internal daylight and sunlight amenity report will also be appended; • Townscape and Visual, limited to the assessment of changes to views and townscape character by reference to updated Accurate Visual Representations; • Built Heritage, limited to the assessment of impacts to the setting of heritage assets; and • Wind, limited to changes to pedestrian comfort and safety. <p>Updated assessments would be supported by supplementary technical notes where necessary to present detailed quantitative/modelling results not presented within the table format.</p>
Cumulative Assessments	<p>The planning consultant has confirmed that the following two new cumulative schemes have come forward since the 2017 EIA:</p> <ul style="list-style-type: none"> • 2-6 St Pancras Way, NW1 OTB (Planning reference: 2017/5497/P); and • St Pancras Commercial Centre, NW1 0BY (Planning reference: 2019/4201/P). <p>The list of cumulative schemes considered within the 2017 EIA will be updated to account for these schemes, as well as to account for minor and material amendments (including those considered for the January 2020 EIL). Commentary will be provided on the associated implications for the cumulative assessment; however, it is anticipated implications will be minor given the two new schemes are located approximately 900 m from the application site.</p>

Table 1: Summary of Environmental Assessment Scope

Element	Summary Scope of Updates
	In addition, where information is publicly available, consideration will be given to the HS2 scheme.

Therefore, we would be grateful for the LBC’s review and confirmation of the above proposed scope of the updated EIA and the proposed format of report.

We look forward to discussing the above scope with you.

If you require any further information, then please do not hesitate to get in touch.

Yours sincerely



Michelle Wheeler

Senior Consulting Manager
Impact Assessment

D +44 207 808 1423
M +44 7921 058107
mwheeler@ramboll.com

Appendix 2

London Borough of Camden Scoping Opinion Response

From: [Michelle Wheeler](#)
To: [Callum Mackenzie](#)
Subject: FW: Camden Goods Yard: 2nd S73 Updated EIA Scope
Date: 13 July 2020 13:47:25
Attachments: [image001.png](#)
[image003.png](#)
[image005.png](#)
[image007.jpg](#)

Kind regards

Michelle Wheeler

Senior Managing Consultant

D +44 (20) 7808 1423

M +44 (79) 21 058 107

mwheeler@ramboll.com

Ramboll UK Limited Registered in England & Wales Company No: 03659970

Registered office: 240 Blackfriars Road, London SE1 8NW

From: Smith, Kristina <Kristina.Smith@camden.gov.uk>

Sent: 17 April 2020 11:21

To: Michelle Wheeler <mwheeler@ramboll.com>

Cc: Jack Landor <Jack.Landor@stgeorgeplc.com>; Ed Noble <Ed.Noble@stgeorgeplc.com>; Richard Syddall <Richard.Syddall@stgeorgeplc.com>; Claire Hammond <Claire.Hammond@stgeorgeplc.com>; 'Oliver Jefferson' <oliver.jefferson@turley.co.uk>; Rebecca Raby-Smith <RRABYSMITH@ramboll.com>; Sexton, Gavin <gavin.sexton@camden.gov.uk>

Subject: RE: Camden Goods Yard: 2nd S73 Updated EIA Scope

Morning Michelle,

Thank you for the phone conversation on Tuesday, it clarified my questions. I am happy for the updated EIA to proceed as suggested.

Kind regards,

Kristina Smith
Senior Planner

Telephone: 020 7974 4986



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Where possible please now communicate with us by telephone or email. We have limited staff in our offices to deal with post, but as most staff are homeworking due to the current situation with COVID-19, electronic communications will mean we can respond quickly.

From: Michelle Wheeler <mwheeler@ramboll.com>

Sent: 16 April 2020 18:35

To: Smith, Kristina <Kristina.Smith@camden.gov.uk>

Cc: Jack Landor <Jack.Landor@stgeorgeplc.com>; Ed Noble <Ed.Noble@stgeorgeplc.com>; Richard Syddall <Richard.Syddall@stgeorgeplc.com>; Claire Hammond <Claire.Hammond@stgeorgeplc.com>; 'Oliver Jefferson' <oliver.jefferson@turley.co.uk>; Rebecca Raby-Smith <RRABYSMITH@ramboll.com>

Subject: Camden Goods Yard: 2nd S73 Updated EIA Scope

Importance: High

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Dear Kristina

Thank you very much for the opportunity to discuss our informal scoping request for the Camden Goods Yard 2nd S73 application, on Tuesday.

For ease of reference, I have summarised the key points that we covered below. We would be grateful for your formal feedback on the scope of the updated EIA as this will enable the EIA team to proceed with their formal assessment works.

1. When comparing the scope of the updated EIA against the scope of the 2018 EIA, it has been noted by the London Borough of Camden (LBC) that the Applicant is not proposing to assess the following:

- Socio-Economic Assessment: Impacts on housing delivery, spending and increased contribution to council tax as a result of the increased residential population.

Applicant response: Impacts on these environmental aspects would give rise to beneficial effects, the scale of which would not be affected by the amended proposed development. As we do not consider these beneficial effects to be material in determining the 2nd S73 application and want to ensure proportionality, we have not proposed re-assessment in this instance.

- Transport assessment: Impacts on cycle facilities, parking supply and demand, access and servicing.

Applicant response: Cycle facilities and servicing arrangements would be addressed in the updated design to account for the increased residential population. Furthermore there would be no adverse effects on parking supply and demand. As we do not consider these effects to be material in determining the 2nd S73 application and want to ensure proportionality, we have not proposed re-assessment in this instance.

2. Confirmation of the validity of traffic and noise surveys.

Applicant response: In terms of baseline traffic flows, the Applicant's transport consultants have confirmed that the traffic surveys previously undertaken remain valid as TfL/Camden Highways expect no significant traffic growth in the area. As traffic is the key source of noise in the study area, the same principle applies to the noise surveys previously undertaken. It is noted that with traffic noise, there has to be a doubling of traffic flows to give rise to a noticeable (3dB) increase in noise levels. Given the increased movement towards car-free development, it is considered highly unlikely that noise levels within the study area would have changed to this degree.

3. Consideration of new 2017 EIA Regulation topics: health, climate, major accidents and

disasters.

Applicant response: The amended proposed development's design has accounted for climate change, health and wellbeing, accidents and emergencies to ensure that significant effects are unlikely to arise. By its very nature, the amended proposed development would not give rise to significant greenhouse gas emissions. Furthermore the amended proposed development will deliver an improvement on CO₂ emissions with the removal of the CHP plant from the Energy Centre. Consistent with the approach adopted for the 1st S73 application, further detail and justification why significant effects are unlikely to arise, will be provided within the EIL.

Please do let us know should you have any further questions, otherwise we look forward to receiving your comments back very soon.

Kind regards
Michelle

Kind regards
Michelle Wheeler
Senior Managing Consultant

D +44 (20) 7808 1423
M +44 (79) 21 058 107
mwheeler@ramboll.com

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From: [Michelle Wheeler](#)
To: [Callum Mackenzie](#)
Subject: FW: ES cumulative schemes
Date: 13 July 2020 13:47:39
Attachments: [image009.jpg](#)
[image001.png](#)
[image003.png](#)
[image005.png](#)
[image007.jpg](#)

Kind regards

Michelle Wheeler

Senior Managing Consultant

D +44 (20) 7808 1423

M +44 (79) 21 058 107

mwheeler@ramboll.com

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Registered office: 240 Blackfriars Road, London SE1 8NW

From: Smith, Kristina <Kristina.Smith@camden.gov.uk>

Sent: 03 June 2020 10:57

To: Oliver Jefferson <oliver.jefferson@turley.co.uk>

Cc: Ed Noble <Ed.Noble@stgeorgeplc.com>; Michelle Wheeler <mwheeler@ramboll.com>;

Richard Syddall <Richard.Syddall@stgeorgeplc.com>

Subject: RE: ES cumulative schemes

Hi Oliver,

I haven't had any further suggestions of schemes to add so I suggest proceed on the basis of what you've got plus the Pancras Way scheme I suggested if it's close enough to be included.

Thanks,

Kristina Smith
Senior Planner

Telephone: 020 7974 4986



The majority of Council staff are now working at home through remote, secure access to our systems.

Where possible please now communicate with us by telephone or email. We have limited staff in our offices to deal with post, but as most staff are homeworking due to the current situation with COVID-19, electronic communications will mean we can respond quickly.

From: Oliver Jefferson <oliver.jefferson@turley.co.uk>

Sent: 29 May 2020 13:46

To: Smith, Kristina <Kristina.Smith@camden.gov.uk>

Cc: Ed Noble <Ed.Noble@stgeorgeplc.com>; Michelle Wheeler <mwheeler@ramboll.com>;
Richard Syddall <Richard.Syddall@stgeorgeplc.com>
Subject: RE: ES cumulative schemes

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Hi Kristina

Further to my email last week, I just wanted to check that you have no comments and are happy with the list of schemes for assessment. We'll proceed on that basis next week unless you have any points you'd like to raise.

Thanks

Olly

Oliver Jefferson
Associate Director

Turley

8th Floor
Lacon House
84 Theobald's Road
London WC1X 8NL
T 020 7851 4010
M 07827 950 588
D 020 7851 4013

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Our co-owners are contactable in the usual ways and we suggest using mobile numbers in the first instance. We are doing all we can to maintain client service during this challenging time.

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From: Oliver Jefferson

Sent: 22 May 2020 17:08

To: Smith, Kristina
Cc: 'Ed Noble'; 'Michelle Wheeler'; Richard Syddall
Subject: ES cumulative schemes

Hi Kristina,

Please can you review the attached table, which refers to cumulative schemes for ES purposes:

- 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 June 2020 EIL
- Blue text with yellow highlight: most up-to-date information on list of cumulative schemes in respect of their status – for further review

Ramboll proposes to continue to assess ALL of the schemes in the cumulative scenario/configuration – not the baseline – so that we can enable a like-for-like, worst case assessment. This approach will be set out in the upfront section of the EIL/SoC for transparency.

Thanks, please let me know of any comments.

Olly

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Appendix 3

Socio - Economics ES Chapter Addendum

Camden Goods Yard

ES Chapter Addendum: Socio-economics

July 2020

Baseline Updates

Education Facilities

Primary Schools

1. Table 1 outlines the current capacity position of primary schools in Camden Primary School Planning Area 3, based on the latest data (January 2020) published by the Department for Education through their online 'Get Information About Schools' service¹. There is spare capacity for 382 places across all schools, approximately half (178 places or 47%) of which is at Brecknock Primary School.

Table 1: Current Primary School Capacity, 2020

Primary School	Capacity	Pupil Roll (R - Y6)	Spare Capacity
Abacus Belsize Free School	210	143	67
Brecknock Primary School	583	405	178
Hawley Primary School	236	188	48
Holy Trinity & St. Silas Church of England Primary School	210	210	0
Holy Trinity Church of England School	189	176	13
Primrose Hill Primary School	483	472	11
Rhyl Primary School	420	396	24
Rosary Roman Catholic Primary School	360	324	36
St Paul's Church of England School	210	205	5
Total Planning Area 3	2,901	2,519	382

DfE, 2020

2. Table 2 outlines LBC's forecasts for primary school capacity for Primary School Planning Area 3, sourced from LBC's latest (2019) 'Annual School Place Planning' report and appendices². Both capacity and pupil numbers are generally forecast to fall over the coming years, with spare capacity being retained, albeit fluctuating.

¹ Department for Education, 2020. 'Get Information About Schools' [Online].

Available at: <https://get-information-schools.service.gov.uk/>

² London Borough of Camden Council, 2019. 2019 Annual School Places Planning Process Report and Appendices

Table 2: Forecast Primary School Capacity, 2019/20 - 2028/29

Forecast Year	Capacity	Pupil Roll	Spare Capacity
2019/20	2,574	2,340	234
2020/21	2,544	2,306	238
2021/22	2,514	2,282	232
2022/23	2,484	2,241	243
2023/24	2,454	2,245	209
2024/25	2,424	2,231	193
2025/26	2,394	2,224	170
2026/27	2,394	2,207	187
2027/28	2,394	2,203	191
2028/29	2,394	2,193	201

LBC, 2019

Secondary Schools

3. Based on data published by LBC³, Table 3 outlines the total and spare capacity of Camden's secondary schools to accommodate pupils up to the age of 16 (Y11). There is a total of 525 Y7 - Y11 places available at the borough's secondary schools.

Table 3: Current Secondary School Capacity, January 2019 (Y7-11)

Primary School	Capacity	Pupil Roll (Y7 - Y11)	Spare Capacity
Acland Burghley	910	784	126
Camden School for Girls	600	588	12
Hampstead	1,050	1,029	21
Haverstock	900	775	125
La Sainte Union	900	867	33
Maria Fidelis	750	642	108
Parliament Hill	900	899	1
Regent High	900	875	25
UCL Academy	900	872	28
William Ellis	650	604	46

³ Ibid. Detailed LBC data (January 2019) used to present the position in terms of Y7 - Y11 pupils, rather than the latest (January 2020) DfE data (which informed the above analysis of primary schools), which reports data only relating to numbers of Y6 - Y13 pupils.

Camden Total	8,460	7,935	525
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Source: LBC, 2019

4. Table 4 outlines LBC’s forecasts for the borough’s secondary school capacity⁴. Spare capacity is forecast to fall slightly over the period to 2023/24 (albeit still maintaining 477 spare places at its lowest levels), but will rise again thereafter to exceed current levels of spare capacity. Significant spare capacity is therefore expected to be maintained over the coming years.

Table 4: Forecast Secondary School Capacity (Y7 - 11), 2019/20 - 2028/29

Forecast Year	School Places	Pupil Roll	Spare Capacity
2019/20	8,536	7,971	565
2020/21	8,527	7,966	561
2021/22	8,514	7,984	530
2022/23	8,496	8,018	478
2023/24	8,508	8,031	477
2024/25	8,520	8,015	505
2025/26	8,520	7,978	542
2026/27	8,520	7,924	596
2027/28	8,520	7,861	659
2028/29	8,520	7,804	716

Source: LBC, 2019

Health Facilities

GP Surgeries

5. A total of eight GP surgeries have been identified within a 1-mile walking distance of the centre of the site. These comprise the same practices as outlined in the 2017 ES, aside from the previously-identified Four Trees Surgery, which has now relocated to merge with the Queens Crescent Practice. NHS Digital data⁵ indicates that, as of December 2019, these surgeries had 70,564 registered patients and were staffed by 52.5 full-time equivalent (FTE) GPs. This equates to an average of 1,345 patients per FTE GP, which is lower than the Camden-wide average of 1,482 patients per FTE GP.
6. Whilst The Royal Academy of General Practitioners (RAGP) set out a recommended target of 1 GP per 1,800 patients, consultation with Camden & Islington Public Health (CIPH) conducted for the 2017 ES established that there is no recommended ratio of patients per full-time GP in Camden, this being due to the differing needs of the registered patients of GP surgeries. GP surgeries therefore plan and utilise their workforce to best meet the needs of their patients. It is

⁴ Ibid.

⁵ NHS Digital, 2019. General Practice Workforce: December 2019

nonetheless noted that the eight surgeries identified have a lower combined GP: Patient ratio than both the RAGP recommendations and the Camden-wide average.

7. Table 5 presents the current workforce and number of patients registered at each of the identified practices. It should be noted that whilst the 2017 ES presented Z-Scores – a relative measure of capacity in terms of the Camden average – as provided by Camden and Islington Public Health (CIPH), Z-Scores are not presented in this update as they have not been obtained from CIPH.

Table 5: Existing GP Surgery Capacity, December 2019

GP Surgery	Patients	GPs (FTE)	Patients per GP
Primrose Hill Surgery	6,619	3.3	2,035
The Matthewman Practice	1,726	1.0	1,726
Prince Of Wales Group Surgery	8,901	10.3	864
Adelaide Medical Centre	11,758	8.7	1,345
Queens Crescent Practice	5,622	4.1	1,358
James Wigg Practice	21,917	14.5	1,507
Amphill Practice	7,951	4.3	1,858
The Regents Park Practice	6,070	6.2	979
Total	70,564	52.5	1,345
Camden Total	302,896	204.4	1,482

Source: NHS Digital, 2019

Dental Practices

8. As reported by the 'Focus on Oral Health' study accompanying Camden CCG's 2017 'Joint Strategy Needs Assessment' (JSNA)⁶ (which was published following completion of the analysis contained within the 2017 ES), as of 2016 there were 177 NHS dentists and 44 NHS high street dental practices in the borough of Camden and that 49.5% of adults in Camden accessed general dental services in 2016.
9. Evidence from the NHS's 'Find a Dentist' search tool⁷ indicates that there are currently seven dental practices within 0.5 miles (800 m straight line distance) of the July 2020 amended proposed development, as shown in Table 6. There are 22 dentists working at these practices, indicating capacity for around 39,600 patients, based on a ratio of one dentist per 1,800 patients. Available data suggests that two local dental practices, Albany Dental Practice and Kentish Town Dental Centre are currently accepting new NHS patients.
10. It should be noted that two practices identified in the 2017 ES – mydentist, Kentish Town Road and Haddenham Dental Centre – have since closed.

⁶ Camden CCG, 2017. Joint Strategic Needs Assessment: Focus on Oral Health

⁷ NHS, 2020. 'Find a Dentist' [Online].

Available at: <https://www.nhs.uk/service-search/find-a-dentist>

Table 6: Existing Dental Practice Capacity, April 2020

Dental Practice	Approx. Distance (miles)	Dentists	Capacity*	Accepting New Patients
Parkway Dental Care	0.3	4	7,200	Not Stated
Ivy House Dental Practice	0.3	1	1,800	Not Stated
Albany Dental Practice	0.4	2	3,600	Yes
Michael Wieder's Dental Surgery	0.4	2	3,600	Not Stated
Kentish Town Dental Centre	0.4	3	5,400	Yes
Camden Dental Centre	0.5	4	7,200	Not Stated
Ace Dental	0.5	6	10,800	No
Total	N/A	22	39,600	N/A

* Note: Capacity based on one dentist per 1,800 patients

Source: NHS: 'Find a Dentist', 2020

Pharmacies

11. Camden Clinical Commissioning Group's (CCG) 2018 'Pharmaceutical Needs Assessment' (PNA)⁸ states that there are 67 pharmacies overall in Camden, of which five are located within the ward of Camden Town with Primrose Hill and two within the ward of Haverstock, totalling seven pharmacies within the neighbourhood impact area.
12. The local impact area of Camden has 26 pharmacies per 100,000 residents⁹. Within Camden Town with Primrose Hill, the number of pharmacies per 100,000 residents (36) is higher than the Camden average (26), whilst Haverstock accommodates a lower average (13). The number of pharmacies per 100,000 residents in the Neighbourhood Impact Area (24) is therefore broadly commensurate with, albeit slightly lower, than the borough-wide average. This is shown in Table 7.

Table 7: Existing Pharmacies, 2018

Area	Population (2018)	Pharmacies	Pharmacies per 100,000 Residents
Camden Town with Primrose Hill	14,060	5	36
Haverstock	14,870	2	13
Neighbourhood Impact Area	28,930	7	24
Camden	262,230	67	26

Source: Camden CCG, 2018; ONS, 2019

⁸ Camden Clinical Commissioning Group, 2018. Camden Pharmaceutical Needs Assessment 2018

⁹ All population figures updated to reflect the latest (2018) ONS Population Estimates, and therefore differ slightly from those presented in the PNA.

Opticians

13. The NHS's 'Find an Optician'¹⁰ search tool indicates that there are four opticians within 0.5 miles (800 m) of the July 2020 amended proposed development, with the closest two services being Foureyes London Ltd t/a Cross Eyes and Eye Contact, each located approximately 0.2 miles (320 m) away.

Hospitals

14. The NHS's 'Find Hospital Services'¹¹ search tool indicates that the closest hospitals to the July 2020 amended proposed development are:
- **St Pancras Hospital**, which is a specialist hospital for geriatric and psychiatric medicine;
 - **Royal Free Hospital**, which has an Accident & Emergency Department offers a range of acute medical services; and
 - **University College Hospital**, which provides Accident & Emergency, general and specialist hospital services

Open / Play Space

15. LBC's latest detailed evidence summarising open and play space provision in the borough remains the 2014 'Open Space, Sport and Recreation Study'¹². The provision of open and play space in the Neighbourhood Impact Area (Camden Town with Primrose Hill and Haverstock wards) relative to the population is outlined in Table 8¹³. The Neighbourhood Impact Area as a whole has lower proportionate provision of both typologies than the borough average, albeit Camden Town with Primrose Hill ward has higher proportionate provision.

¹⁰ NHS, 2020. 'Find an Optician' [Online].

Available at: <https://www.nhs.uk/service-search/find-an-optician>

¹¹ NHS, 2020. 'Find Hospital Services' [Online].

Available at: <https://www.nhs.uk/service-search/other-services/Hospital/LocationSearch/7>

¹² London Borough of Camden Council, 2014. Camden Open Space, Sport and Recreation Study

¹³ Note that whilst the Camden Open Space, Sport and Recreation Study benchmarks provision against the wards' 2011 populations, the population figures in the table have been updated to align with the more up to date Population Estimate for 2018 published by the ONS.

Table 8: Open Space in Neighbourhood Impact Area, 2014

Area	Population (2018)	Park Space (ha)*	Open Space (ha)	Park Space per 1,000 population (ha)	Open Space per 1,000 population (ha)
Camden Town with Primrose Hill	14,060	34.2	36.1	2.4	2.6
Haverstock	14,870	1.9	2.4	0.1	0.2
Neighbourhood Impact Area	28,930	36.1	38.5	1.2	1.3
Camden	262,226	396.3	588.8	1.5	2.2

* Note: Total park space includes the sum of the following open space typologies for each ward: Linear Park / Open Space, Metropolitan Parks, District Parks, Local Parks, Small Local Parks / Open Spaces and Pocket Parks.

Source: LBC, 2015; ONS, 2019

16. The Study also outlines a more detailed assessment of open spaces, which was outlined in the original ES and has been reproduced for reference in Table 9. It can be seen that 66 % of open space in the Neighbourhood Impact Area is District Park, with the Regents Canal accounting for 16 % of open space. Small parks and pocket parks account for 12 % of total open space in the study area.

Table 9: Existing Open Spaces in Neighbourhood Impact Area by Function, 2014

Name	Area (ha)	% of total Area	Primary Function
Camden Town with Primrose Hill			
Camden Gardens	0.2	1%	Pocket park
Chalcot Square	0.2	1%	Pocket park
Clarence Way Games Pitch	0.1	0%	Outdoor sports facilities / playing fields (private)
Clarence Way Open Space	0.2	1%	Pocket park
Hawley Street Open Space	1.3	3%	Small local park / open space
Primrose Hill Open Space	25.3	66%	District park
Regent's Canal	6.3	16%	Linear open space / green corridors
Regents Park Terrace	0.1	<1%	Amenity green space
St Martin's Garden	0.7	2%	Small local park / open space
Barrow Hill Reservoir	1.6	4%	Other
St Georges Terrace	0.1	<1%	Amenity green space
Haverstock			
Maitland Park Enclosure	<0.1	<1%	Amenity green space
Talacre Public Open Space	1.9	5%	Small local park / open space
Adelaide Road Private Nature Reserve	0.5	1%	Natural or semi-natural urban greenspace
Beckington Open Space	0.1	<1%	Amenity green space
Total	38.6	100%	-

Source: LBC, 2014

17. When considering Children's playspace individually within the Neighbourhood Impact Area, the 2014 Camden 'Open Space, Sport and Recreation Study' identifies the following provision within the two wards of Camden Town with Primrose Hill and Haverstock:
- **Camden Town with Primrose Hill** – 1,300 m² of formal play provision and 221,576 m² of informal play provision
 - **Haverstock** - 400 m² of formal play provision and 11,353 m² of informal play provision
18. This equates to 115 m² of play space per child in Camden Town with Primrose Hill and a significantly lower 5 m² of play space per child in Haverstock. Based on this information, the current provision of play space per child in the neighbourhood impact area equates to 54 m² which is somewhat higher than the LBC average of 26 m² of play space per child.

Legislation Updates

Regional Policy Updates

The London Plan – Intend to Publish Version

19. The ‘London Plan – Intend to Publish Version’¹⁴ was published in December 2019 and is therefore at an advanced stage and carries significant weight, albeit not yet formally adopted.
20. Policies relevant to this updated socio-economic assessment are set out in Table 10.

Table 10: Draft London Plan (Intend to Publish) Policies

Policy	Key Provisions
G4: Open space	Development proposals should: <ol style="list-style-type: none">(i) Not result in the loss of protected open space;(ii) Where possible create areas of publicly accessible open space, particularly in areas of deficiency.
T2: Healthy Streets	Development proposals should: <ol style="list-style-type: none">(i) Deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling;(ii) Demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance;
S4: Play and informal recreation	Development proposals for schemes that are likely to be used by children and young people should: <ol style="list-style-type: none">(i) Increase opportunities for play and informal recreation and enable children and young people to be independently mobile(ii) For residential developments, incorporate good-quality, accessible play provision for all ages. At least 10 square metres of playspace should be provided per child that:<ol style="list-style-type: none">a) provides a stimulating environment;b) can be accessed safely from the street by children and young people independently;c) forms an integral part of the surrounding neighbourhood;d) incorporates trees and/or other forms of greenery;e) is overlooked to enable passive surveillance; andf) is not segregated by tenure;

¹⁴ Greater London Authority, 2019. London Plan – Intend to Publish Version

- (iii) Incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently;
- (iv) For large-scale public realm developments, incorporate incidental play space to make the space more playable;
- (v) Not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand. Where published, a borough's play and informal recreation strategy should be used to identify ongoing or future demand for play provision.

S3: Education and childcare facilities	To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should: <ul style="list-style-type: none"> (i) Assess needs locally and sub-regionally, addressing cross-boundary issues. Needs assessments should include an audit of existing facilities; (ii) Ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision
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S2: Health and social care facilities	Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to: <ul style="list-style-type: none"> (i) Identify and address local health and social care needs within Development Plans, taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies; and (ii) Assess needs locally and sub-regionally, addressing borough and CCG cross-boundary issues
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Mayor of London, 2019

Local Policy Updates

Camden Local Plan 2017

21. The current Camden Local Plan¹⁵ was adopted in 2017 (replacing the 2010 Core Strategy) and covers the period 2016-2031. Updated policies relevant to this updated socio-economic assessment are set out in Table 11.

Table 11: Relevant Camden Local Plan Policies

Policy	Key Provisions
A2: Open Space	To secure new and enhanced open space and ensure that development does not put unacceptable pressure on the Borough's network of open spaces, the Council will:

¹⁵ London Borough of Camden Council, 2017. Camden Local Plan

-
- Seek developer contributions for open space enhancements using Section 106 agreements and the Community Infrastructure Levy (CIL);
 - Apply a standard of 9 m² per occupant for residential schemes and 0.74 m² per worker for commercial schemes;
 - Give priority to securing new public open space on-site, with provision off-site near to the development only considered acceptable where provision on-site is not achievable;
 - Ensure developments seek opportunities for providing private amenity space; and
 - Give priority to play facilities and the provision of amenity space which meet residents' needs where a development creates a need for different types of open space
-

C1: Health and Wellbeing To improve and promote strong, vibrant and healthy communities through ensuring a high quality environment with local services to support health, social and cultural wellbeing and reduce inequalities, the Council will:

- Require development to positively contribute to creating high quality, active, safe and accessible places; and
 - Require that proposals for major development schemes include a Health Impact Assessment (HIA)
-

C2: Community facilities To ensure that community facilities and services are developed and modernised to meet changing community needs and reflect new approaches to service delivery, the Council will:

- Seek planning obligations to secure new and improved community facilities and services to mitigate the impact of developments;
 - Expect a developer proposing additional floorspace in community use, or a new community facility, to reach agreement with the Council on its continuing maintenance and other future funding requirements; and
 - Facilitate multi-purpose community facilities and the secure sharing or extended use of facilities that can be accessed by the wider community
-

LBC, 2017

Camden Planning Guidance: Public Open Space

22. The Council formally adopted 'Camden Planning Guidance Public Open Space' (CPGPOS)¹⁶ in March 2018. This document replaces the 'Open Space, Outdoor Sport and Recreation Facilities' section of the Council's 'CPG6: Amenity' (September 2011) and the 'Provision of Public Open Space' section of 'CPG8: Planning Obligations' (July 2015).
23. CPGPOS re-states Camden Local Plan 'Policy A2: Open Space' regarding the standards by which developments are expected to contribute towards open space and play facilities.
24. CPGPOS outlines the maximum distance it is considered that people can reasonably be expected to travel on a regular basis to use different types of open space. Whilst green amenity space and children's play space should be available within easy walking distance of the development to

¹⁶ London Borough of Camden Council, 2018. Camden Planning Guidance: Public Open Space

which they relate, it is also acknowledged that people are generally willing to travel further to use recreation areas providing outdoor sport facilities or to larger parks. Table 12 outlines the distance thresholds for types of public open space.

25. It should be noted that the maximum distance standards outlined within the CPGPOS broadly align with those previously included within the Council’s now-superseded ‘CPG6: Amenity’, and therefore informed the preparation of the previous ES. The following minor updates have been made to playspace terminology and maximum distance standards:

- **Under 5s** – previously termed Local Area for Play, the maximum access distance was given as 50 m, and has been updated to 100 m;
- **5 -11 year olds** – previously termed Local Equipped Area for Play the maximum access distance was given as 280 m and has been updated to 400 m; and
- **12 years and above** – previously termed Neighbourhood Equipped Area for Play, the maximum access distance was given as 500 m and has been updated to 800 m.

26. Therefore it is noted that the maximum access distance standards for playspace typologies have been increased slightly by the Council’s updated policy.

Table 12: Distance threshold for types of public open space

Type of public open space	Maximum distance from development to public open space	Definition of Space Type / Notes on Provision
Public amenity open space	280 m	Formal or informal parks and gardens or other landscaped areas, which provide areas of passive recreation for all age groups and attractive green areas within the urban environment
Formal recreation area	1.2 km	Areas of grassed or artificial surfaces providing opportunities for sport and recreation. It is stated that the potential to add to outdoor sports facilities is limited in Camden.
Natural greenspace	1 km walk from publicly accessible Borough/Metropolitan Site of Importance for Nature Conservation (SINC)	Includes sites and areas formally recognised for nature conservation value, such as Sites of Special Scientific Interest, Sites of Nature Conservation Importance and Local Nature Reserves as well as other areas with biodiversity such as gardens, parks and open spaces.
Allotments and community gardens	Any	Provide opportunities for people to grow food as part of the long term promotion of sustainability, health and social inclusion. It is stated that provision will be sought wherever an opportunity arises, but will not be counted as part of the public open space standards.
Play Space Provision		

Under 5s	100m	Small landscaped play area with age-appropriate play features and furniture for parents and carers.
5 -11 year olds	400m	Play area with age-appropriate play features within a landscaped space and furniture for parents and carers; Kickabout areas: Bike track, scooter park or other age-appropriate wheeled facility
12 years and above	800m	Social space appealing to young people, with one or more of the following recreational opportunities: - Adventure playgrounds; - Sport or recreation space that is open access (e.g. ball court, basketball court, multi-use games area); - Skatepark, bike park or other wheeled facility; - Fitness trails or other age-appropriate fitness equipment/ areas; - Outdoor stage - Youth shelters or other sociable seating spaces meeting the needs of this age group
Natural greenspace	500m	As outlined above.

LBC, 2018

27. Civic spaces, hard surfaced areas designed for pedestrians, such as piazzas, which are often destinations and provide opportunities for communities to come together and interact are also identified as a type of public open space, albeit no access standards are outlined.
28. It is stated that the Council will apply the thresholds flexibly and that:

“Section 106 agreements will specify a named site where the Council agrees that a payment in lieu is the most appropriate way of meeting the Local Plan policy requirements. We will consider departing from the distances below if there is a reasonable likelihood that improvements to the capacity and quality of existing open spaces at greater distances from the development will genuinely bring benefit for occupants of a proposed scheme”¹⁷

Assessment of Impacts Updates

Population and Pupil Yield Impacts

29. Based on the average household size by dwelling size in Camden as recorded by the 2011 Census, the total residential population of the July 2020 amended proposed development has been estimated in line with the methodology previously deployed in the 2017 ES.

¹⁷ Ibid. Appendix B: Catchment distances and deficiency areas

30. A review of LBC's latest (2019) 'Annual School Places Planning Process Report' and its appendices highlights that the Council continue to use the 2008 'Camden Survey of New Houses' in order to calculate the pupil yield of new housing development¹⁸. The estimated pupil yield for primary and secondary age pupils has subsequently been calculated in line with the methodology deployed in the 2017 ES. This methodology estimates that 243 of the 1,251 residents accommodated (approximately 19% of residents) will be under the age of 18. Of these, 94 will be of primary age and 67 will be of secondary age.
31. Total population and pupil yields are presented in Table 13.

Table 13: Population and Pupil Yield of July 2020 Amended Proposed Development

Tenure	Units	Average Household Size	Child Yield per Unit	Population (All Ages)	Children (Aged 0-18)	Primary Children (Aged 5-11)	Secondary Children (Aged 12-16)	
Market								
1 bed	238	1.15	0.04	275	10	4	3	
2 beds	161	2.31	0.14	372	23	9	6	
3 beds	42	3.46	0.37	145	16	6	4	
4 beds	0	4.62	1.55	0	0	0	0	
Social Rent								
1 bed	18	1.15	0.10	21	2	1	1	
2 beds	37	2.31	1.24	85	46	18	13	
3 beds	47	3.46	1.53	163	72	28	20	
4 beds	8	4.62	2.60	37	21	8	6	
Intermediate Rent								
1 bed	53	1.15	0.10	61	5	2	1	
2 beds	40	2.31	1.24	92	50	19	14	
3 beds	0	3.46	1.53	0	0	0	0	
4 beds	0	4.62	2.60	0	0	0	0	
Total	All units	644	-	-	1,251	243	94	67

Source: ONS, 2011; LBC, 2008

32. The increase in unit numbers from 573 to 644 means that the total estimated population yield of 1,251 presented above has increased by 127 (11%) in comparison with the total yield of 1,124 estimated in the 2017 ES. The estimated 243 children aged under 18 is circa 12% higher than the 216 estimated for the previously consented scheme.

¹⁸ London Borough of Camden Council, 2019. 2019 Annual School Places Planning Process Report: Appendix A, Table 2

33. The GLA 'Population Yield Calculator'¹⁹ also provides a means of estimating the population generated by development. The GLA calculator estimates that residents under the age of 18 would number 226, as opposed to 243 estimated at Table 12, (which is based on the 'Camden Survey of New Houses') in calculating pupil yield. This indicates that the methodology presented at Table 12 represents an appropriate 'worst-case' scenario by which to assess the July 2020 amended proposed development's impact on demand for education facilities, and is also particularly appropriate, given that it is based on local data and reflects LBC's methodology for calculating pupil yield.
34. However, the GLA's 'Population Yield Calculator' does indicate that the total site population (i.e. residents of all ages) would be higher than the methodology outlined above. Based on the number, size and tenure of proposed homes, the Calculator indicates that the total site population would be 1,328 residents.

Education Facilities Demand

Primary Education

35. As outlined above it is estimated that the July 2020 amended proposed development will generate 94 primary school age pupils, who would generate additional demand for local primary education facilities. This is an increase of 10 pupils (an increase of 12%) from that previously predicted in the 2017 ES.
36. The analysis of existing primary school capacity presented at Table 1 indicates that Camden Primary School Planning Area 3 has spare capacity for 382 places. The primary school place planning forecasts presented in Table 2 indicates that spare capacity over the period 2019/20 – 2028/29 will fluctuate somewhat, but never fall below 170.
37. Therefore, it is considered that existing provision would be able to accommodate the demand for primary school places generated by the July 2020 amended proposed development. This is particularly the case given that the forecasts already take account of the July 2020 amended proposed development in accordance with the previous planning application²⁰.
38. Based on the requirement for 94 additional pupils (which can be accommodated according to forecasts), the impact is assessed to be of very low magnitude when considered in the context of the forecast school places. The sensitivity of the receptor (education facilities) is considered to be high. Therefore the July 2020 amended proposed development would result in a **Negligible** effect at the neighbourhood level. This is consistent with the conclusion previously reached in the 2017 ES.

Secondary Education

39. As outlined above it is estimated that the July 2020 amended proposed development would generate 67 secondary school age pupils, who would generate additional demand for local

¹⁹ Greater London Authority, 2019. GLA Population Yield Calculator [Online].

Available at: <https://data.london.gov.uk/dataset/population-yield-calculator>. Calculator's Geographic Aggregation set to 'Inner London' and PTAL set to 'PTAL 5-6' to run the assessment.

²⁰ Camden's 2019 Annual School Places Planning Process' 'Appendix E – Housing' profiles larger developments of over 100 units to 2033/34 that are included within the Camden housing trajectory. This includes the proposed development as previously approved.

secondary education facilities. This is an increase of 7 pupils (an increase of 12%) from that previously predicted in the 2017 ES.

40. The analysis of existing secondary school capacity presented at Table 3 indicates that Camden has spare capacity for 525 places. The secondary school place planning forecasts presented in Table 4 indicates that spare capacity over the period 2019/20 – 2028/29 will fluctuate somewhat, but never fall below 477.
41. Therefore, existing provision would be able to accommodate the demand for secondary school places generated by the July 2020 amended proposed development. This is particularly the case given that the forecasts already take account of the proposed development in accordance with the previous planning application²¹.
42. Based on the requirement for 67 additional pupils (which can be accommodated according to forecasts), the impact is assessed to be of very low magnitude when considered in the context of the forecast school places. The sensitivity of the receptor (education facilities) is considered to be high. Therefore, the July 2020 amended proposed development would result in a **Negligible** effect at the local level. This is an improvement from the Minor Adverse effect previously reached in the 2017 ES.

Health Facilities Demand

43. Based on the GLA’s ‘Population Yield Calculator’ (which is the methodology returning the higher estimate of population i.e. the ‘worst case’ scenario in terms of impact on health facilities), the July 2020 amended proposed development would accommodate a population of 1,328 residents, who would generate additional demand for local GP surgeries. This number of residents would equate to additional demand for 0.7 GPs, based on the 1,800 patients per GP ratio recommended by the Royal Academy of General Practitioners (RAGP). This increase of 204 patients (an increase of 18%) in comparison with the 1,124 estimated in the 2017 ES, equates to further additional demand generated for 0.1 GP.
44. As outlined in Table 14, existing provision of GP surgeries identified within 1-mile walking distance of the site could accommodate this additional demand with minimal impact on the existing patient per GP ratio, which will rise only slightly, from 1,345 to 1,370 patients per GP.
45. It is noted that this figure remains lower than the number of patients per GP currently recorded in Camden as a whole (1,482), and significantly lower than the ratio of 1,800 patients per GP recommended by the RAGP.

Table 14: GP Demand Generated by July 2020 Amended Proposed Development

	Identified GP Surgeries	Camden
Current Patients	70,564	302,896
Current GPs (FTE)	52.5	204.4

²¹ Camden’s 2019 Annual School Places Planning Process’ ‘Appendix E – Housing’ profiles larger developments of over 100 units to 2033/34 that are included within the Camden housing trajectory. This includes the proposed development as previously approved.

Current Patients per GP (FTE)	1,345	1,482
Additional Patients	1,328	1,328
Total Patients Following Occupation of the July 2020 Amended Proposed Development	71,892	304,224
Patients per GP Following Occupation of the July 2020 Amended Proposed Development	1,370	1,488

Source: Turley Economics, 2020

46. Given that two local dental practices are accepting new patients and the neighbourhood impact area maintains a number of pharmacies to 100,000 people broadly in line with the local average, it is reasonable to assume that the increased population can be accommodated within existing local health facilities.
47. On the basis of the information set out above, the July 2020 amended proposed development is likely to have a **Negligible** effect on health facilities at the neighbourhood and local levels. This is consistent with the conclusion previously reached in the 2017 ES.

Open / Play Space Demand

Open Space

48. In order to secure new and enhanced open space within the local impact area and ensure that development does not put unacceptable pressure on the borough's existing open spaces, 'Policy A2: Open Space' of the Camden Local Plan²² sets out LBC's requirement for the provision of 9 m² per occupant for residential schemes and 0.74 m² per worker for commercial developments. These standards are also set out in 'Camden Planning Guidance: Public Open Space'²³.
49. On this basis, and reflecting the worst case estimate of population yield based on the GLA 'Population Yield Calculator', the residents and employees²⁴ accommodated at the July 2020 amended proposed development would generate demand for approximately 12,832 m² of open space, as demonstrated in Table 15. This is 1,156 m² greater than the demand for 11,676 m² open space estimated within the 2017 ES (an increase of 10%).

²² London Borough of Camden Council, 2017. Camden Local Plan

²³ London Borough of Camden Council, 2018. Camden Planning Guidance: Public Open Space

²⁴ The estimate of gross on-site employment is based on the methodology from the original Socio-economics ES Chapter updated proportionately as per the proposed non-residential floorspace schedule for the current proposal. This has resulted in a minor uplift in on-site employment, increasing from 1,184 Full Time Equivalent (FTE) on-site employees as previously assessed to 1,190 FTE for the current proposal.

Table 15: July 2020 Amended Proposed Development Open Space Demand

Type of Development	Open Space Standard (m ² per occupant)	Occupants	Open Space Requirement (m ²)
Residential	9.00	1,331	11,952
Commercial	0.74	1,190	880
Total	-	2,515	12,832

Source: LBC, 2017; Turley Economics, 2017 & 2020

50. The July 2020 amended proposed development will deliver a total of 12,254 m² of on-site public open space, which is slightly lower (- 578 m²) than the policy compliant area of 12,832 m². The proposed on-site open space therefore represents 95% of the policy compliant area. It should be noted that using the same methodology to estimate population as that used in the 2017 ES would result in a requirement for open space equivalent to 12,139 m², which means that the proposed open space provision of 12,254 m² would deliver 115 m² in excess of the policy compliant area.
51. The types and quantum of open space to be delivered in the July 2020 amended proposed development is presented in Table 16. Note that some types of open space are named slightly differently in comparison with the 2017 ES. The original terminology is included in brackets,

Table 16: Proposed Open Space by Type

Type of Open Space	Quantum Proposed (m ²)
Civic space (amenity open space)	7,496
Green amenity space (amenity green open space)	2,932
Play space (Children's play space)	1,265
Food growing Allotments/community gardens)	561
Total	12,254

Source: Berkley St George, 2020

52. It is additionally noted that the July 2020 amended proposed development includes approximately 4,494m² of communal amenity space and 3,436 m² of private amenity space across its residential blocks for use by the residents (totalling 7,930 m²). Total amenity space (public and private) across the site therefore totals 20,184 m².
53. In a worst case scenario, the provision of new open space and recreation facilities is likely to have an impact of very low magnitude given that the on-site provision would deliver 95 % of the public open space required by policy and also delivers an additional 7,930 m² of communal and private amenity space for residents across its residential blocks that would also help meet demand for amenity space arising from the July 2020 amended proposed development. The sensitivity of the receptor is considered to be high. It is therefore expected that the proposed development would have a **Negligible** direct, permanent and long-term effect on open space and recreation facilities

at the neighbourhood level. Note that the impact was assessed as ‘minor beneficial’ in the 2017 ES, given that the scheme as previously consented provided open space in excess of estimated demand.

Play Space Demand

- 54. The GLA’s ‘Play and Informal Recreation SPG’²⁵ sets out requirements for new development to ensure that a minimum of 10 m² of play space per child residing in the new development is provided within a maximum walking distance of 100 m for under 5s, 400 m for 5-11 year olds and 800 m for 12+ years. These benchmarks are also supported by ‘Camden Planning Guidance: Public Open Space’ (CPGPOS)²⁶ for those major schemes proposing an increase of 100 dwellings or more.
- 55. Based on the worst case scenario of July 2020 amended proposed development accommodating 243 residents under the age of 18 (as set out at Table 12), the July 2020 amended proposed development would generate demand for 2,430 m² play space. This is an increase in demand of 267 m² (an increase of 12%) in comparison with the quantum estimated by the 2017 ES. Play Space demand generated by the July 2020 amended proposed development is set out Table 17.

Table 17: July 2020 Amended Proposed Development Playspace Demand

Type of Development	Play Space Standard (m ² per child)	Child Yield (Aged 0-18)	Play Space Requirement (m ²)
Residential	10	243	2,430

Source: LBC, 2017; Turley Economics, 2017 & 2020

- 56. CPGPOS defines play space as follows:
 - Small landscaped play area with age-appropriate play features and furniture for parents and carers;
 - Play area with age-appropriate play features within a landscaped space and furniture for parents and carers;
 - Kickabout areas;
 - Bike track, scooter park or other age-appropriate wheeled facility;
 - Social space appealing to young people, with one or more of the following recreational opportunities:
 - Adventure playgrounds;
 - Sport or recreation space that is open access (e.g. ball court, basketball court, multi-use games area);
 - Skatepark, bike park or other wheeled facility;

²⁵ Greater London Authority, 2012. Play and Informal Recreation SPG

²⁶ London Borough of Camden Council, 2018. Camden Planning Guidance: Public Open Space

- Fitness trails or other age-appropriate fitness equipment/ areas;
- Outdoor stage;
- Youth shelters or other sociable seating spaces meeting the needs of this age group;
- Public amenity open space;
- Formal Recreation Area; and
- Natural greenspace.

57. Based on this evidence, this assessment considers that amenity open space, green amenity open space, children's play space and outdoor sports facilities would contribute towards the provision of children's play space. On this basis, the July 2020 amended proposed development would deliver 3,204 m² of green amenity space potential used as play space on-site, plus a further 1,265 m² formal play space. This totals 4,469 m², thereby meeting and exceeding the GLA's requirements.

58. The impact of the July 2020 amended proposed development on children's play space is assessed as beneficial. The magnitude of the impact of the July 2020 amended proposed development would be low. The sensitivity of the receptor is considered to be high. Therefore, there is likely to be a direct, permanent, long-term and **Minor Beneficial** effect on the provision of children's play space at the neighbourhood level. This is consistent with the 2017 ES's conclusion for play space provision.

Cumulative Impacts

59. Cumulative impacts are those that may result from the combination of past, present or future actions of existing or planned activities in a project's zone of influence. While a single activity may itself result in an insignificant impact, when combined with the impacts (significant or insignificant) of other activities, it may result in a cumulative effect that is significant.

60. Cumulative schemes will generate impacts during both the demolition and construction stage and the completed development stage. Indicators with potential to be impacted as a result of cumulative schemes include:

- Demand for education facilities;
- Demand for health facilities; and
- Demand for open space and play space facilities.

61. The schemes identified in Table 18 have been assessed in conjunction with the July 2020 amended proposed development in order to understand the cumulative impact. Estimates of the number of residents²⁷, the pupil yield²⁸ and details of on-site infrastructure are also included

²⁷ Estimated based on the average household size for flats/apartment in Camden, as recorded by the 2011 Census.

²⁸ Estimated based on the average pupil yield per dwelling for the Proposed Development as reported by this assessment and housing developments in Camden included within the cumulative assessment (Hawley Wharf, Agar Grove Estate, Bacton Estate) as reported by LBC's 2019 Annual School Places Planning Process: Appendix E – Housing. Pupil yields for the developments included within this assessment and LBC's Annual School Places Planning Process have been reported as per this assessment /

(note that some schemes included within the cumulative assessment are not residential schemes).

Table 18: Cumulative Schemes

Scheme Name	Distance from July 2020 Amended Proposed Development (straight-line miles)	Residential units (net)	Resident Population	Children (aged 0-18)	On-site social Infrastructure
100,100a and 100b Chalk Farm Road	0.1	63	135	20	Amenity open space
44-44a Gloucester Avenue	0.1	40	86	13	-
Long Stable Stables Market Chalk Farm Road	0.1	0	0	0	-
5-17 Haverstock Hill	0.2	77	165	25	Play space; amenity open space
1-6 Centric Close	0.2	76	163	24	Play space; amenity open space
The Roundhouse Theatre	0.2	0	0	0	-
28 Camden Wharf Jamestown Road	0.2	0	0	0	-
Hawley Wharf: Land bounded by Chalk Farm Road, Castlehaven Road, Hawley Road	0.3	194	415	29	1FE primary school and nursery Play space; MUGA; amenity open space
Camden Lock Market Site	0.3	0	0	0	-
Marine Ices 4-8a Haverstock Hill & 45-47 Crogsland Road	0.3	19	41	6	-
11 Crogsland Road	0.3	38	38	0	-
140-146 Camden Street	0.4	52	111	17	-

LBC's published estimates for the developments, with the pupil yield for the remaining developments having been estimated based on the average pupil yield for the aforementioned schemes.

St Pancras Commercial Centre	0.6	33	71	11	Amenity open space
Agar Grove Estate	0.7	244	522	42	Play space; MUGA; Amenity open space; natural/semi-natural greenspace
Bacton Estate	0.7	191	409	7	Play space; amenity open space
2-6 St Pancras Way	0.8	73	156	23	Play space; amenity open space
Total	-	1,100	2,311	217	-

Note: 11 Crogsland Road is an older persons extra care development. Units have therefore all been assumed single-occupancy, with zero pupil yield.

Source: Berkley St George, 2020; LBC, 2020; Turley Economics 2020

62. Given that the detailed breakdown of dwelling sizes and tenures is required to estimate schemes' population using the GLA 'Population Yield Calculator' tool and that this information is not accessible for all the cumulative schemes, a 'worst-case' population figure has been calculated by applying the percentage uplift calculated by the GLA tool for the July 2020 amended proposed development in comparison with using a Census-based methodology (an uplift of 6%). This calculation indicates that the cumulative schemes could accommodate a total of 2,453 residents.
63. Based on the average child yield of cumulative schemes as estimated by LBC's 2019 'Annual School Places Planning Process' document, a total of 217 children under the age of 18 could be accommodated at the cumulative schemes²⁹. LBC's methodology indicates that this total equates to an average of 12 pupils per primary and secondary year group, suggesting that the total number of primary school age children would equate to 84 and the number of secondary school age children would equate to 60, thereby totalling 144 primary and secondary school age children.

Education Facilities Demand

64. It is estimated that the identified cumulative schemes would generate a pupil yield of 144 pupils across both primary and secondary ages. It is also noted that a new 1FE primary school is set to be delivered as part of the Hawley Wharf scheme.
65. Camden's 2019 'Annual School Places Planning Process' report's 'Appendix E – Housing' profiles larger developments of over 100 units to 2033/34 that are included within the Camden housing trajectory (of which the cumulative assessment includes Hawley Wharf, Agar Grove Estate,

²⁹ The GLA Population Yield Calculator uplift has not been applied to the estimation of the child yield, given that this estimate has been based on LBC pupil place planning data.

Bacton Estate around one third of cumulative demand, plus the July 2020 amended proposed development itself) but also states that:

“[Developments of] units under 100 are not shown, however they are included in development data supplied to the GLA and within Camden GLA forecasts” [original document’s emphasis].

66. Together with the July 2020 amended proposed development, the cumulative schemes are estimated to generate demand for 310 school places across both primary and secondary, as outlined in Table 19.

Table 19: July 2020 Amended Proposed Development and Cumulative Pupil Yield

	Primary	Secondary	Total
July 2020 Amended Proposed Development	94	67	161
Cumulative Schemes	84	60	144
Total	178	127	305

Source: Turley Economics, 2020

67. As reported above, this assessment’s findings in terms of the capacity position for primary and secondary position education in the areas relevant to the July 2020 amended proposed development are as follows:
- **Primary** - Camden Primary School Planning Area 3 currently has spare capacity for 382 places. The primary school place planning forecasts presented in Table 2 indicates that spare capacity over the period 2019/20 – 2028/29 will fluctuate somewhat, but never fall below 170 (in the academic year 2025/26, before rising again year on year thereafter, reaching spare capacity for 201 places by 2028/29). Therefore the demand for an additional 178 primary places generated by the July 2020 amended proposed development plus the cumulative schemes could be met through planned provision. Though in one year the space capacity (170) appears to be lower than the additional demand (178), the forecasts already take into account a number of the cumulative developments, as well as the May 2020 consented scheme, it is likely that all demand can be met.
 - **Secondary** – Camden has spare capacity for 525 places. The primary school place planning forecasts presented in Table 2 indicates that spare capacity over the period 2019/20 – 2028/29 will fluctuate somewhat, but never fall below 477. Therefore the demand for an additional 127 secondary places generated by the July 2020 amended proposed development plus the cumulative schemes could be met through planned provision.
68. Taking into account that the Council’s education forecasts take into account demand from a number of schemes and that there is forecast to remain capacity at both primary and secondary levels which can accommodate demand above that arising from the July 2020 amended proposed development and cumulative development, it is concluded that the cumulative effect would be **Negligible** on demand for education facilities.

Health Facilities Demand

69. It is estimated that the cumulative schemes will accommodate 2,453 residents under the worst case scenario. This equates to approximately 1.4 FTE GPs, considered in terms of the RAGP's recommended target of 1 GP per 1,800 patients.
70. It is estimated that the July 2020 amended proposed development and cumulative schemes will accommodate a total of 3,781 residents (i.e. potential patients). As outlined in Table 20, even if all new patients were to attend only the GP facilities identified by this assessment as relevant to the July 2020 amended proposed development (which itself is unlikely, since their geographic spread within 1 mile of the July 2020 amended proposed development means that residents of the cumulative schemes will be able to access additional surgeries not included in the assessment) the total patients per GP ratio at the identified surgeries would remain lower than the RAGP's recommended target of 1 GP per 1,800 patients. This is also the case in terms of the borough-wide analysis.

Table 20: Cumulative Health Facilities Demand

	Identified GP Surgeries	Camden
Current Patients	70,564	302,896
Current GPs (FTE)	52.5	204.4
Current Patients per GP (FTE)	1,345	1,482
Additional Patients (July 2020 amended proposed development and Cumulative Schemes)	3,781	3,781
Total Patients Following Occupation of the July 2020 amended proposed development and Cumulative Schemes	74,345	306,677
Patients per GP Following Occupation of the Proposed Development and Cumulative Schemes	1,417	1,500

Source: Turley Economics, 2020

71. An additional 3,781 residents would also have only a minimal impact on provision of pharmacies in the borough of Camden (the rate changing from 26.2 to 25.2 pharmacies per 100,000 residents). Camden CCG's 'JSNA'³⁰ does not highlight a supply of dental facilities as an area requiring improvement (instead stating that priorities include working with existing dental services to promote the services available and continuing to develop local oral health promotion) indicating that current provision will be able to accommodate demand rising from new housing. Given the number of hospitals both within close proximity and across London it is anticipated that this level of additional demand can be met.
72. Therefore, it is concluded that the cumulative effect would be **Negligible** on demand for health facilities.

³⁰ Camden CCG, 2017. Joint Strategic Needs Assessment: Focus on Oral Health

Open Space and Place Space Facilities Demand

73. It is noted that the majority of cumulative schemes (equal to 2,140 residents based on a worst-case 6% uplift to the numbers set out in Table 17, this representing 87% of cumulative scheme residents) that would generate additional demand for open space and play space facilities include provision of additional open space. See Table 17.
74. For those schemes which do not include additional provision (equivalent to 293 residents based on the 6% worst-case uplift), it is anticipated that the demand for open space generated at the scale of both the neighbourhood impact area and the borough would result in minimal change to the per person provision of open space.
75. It is concluded that the cumulative effect would be **Negligible** on demand for open space and play space facilities.

Contact

Amy Gilham
amy.gilham@turley.co.uk

July 2020

STGP3001