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Trium Memorandum

MURPHY’S YARD – EIA SCOPING OPINION RESPONSE

We write on behalf of Folgate Estates Limited (‘the Applicant’) to provide a response to the pertinent points raised in the EIA Scoping Opinion (planning application reference: 2020/5774/P) provided by the London Borough of Camden in response to the Murphy’s Yard EIA Scoping Report (submitted in December 2020) and the Scoping Report Addendum (submitted in April 2021).

Consultee feedback and the Applicant’s response has been provided in the table below against each of the pertinent points raised in the LBC’s EIA Scoping Opinion to assist in the LBC’s review of the Environmental Statement (ES) that has been submitted in support of the planning application.

Statutory Consultee	Statutory Consultee Comment	Applicant Response
London Borough of Camden	<p>Paragraph 12 of the EIA Scoping Report states “Information on Trium’s lead EIA practitioners (partner and project manager), as well as the technical contributors to the EIA, will be included within the ES”.</p> <p>This information should detail the relevant qualifications, professional registrations and experience of the lead EIA practitioners and all contributing technical experts for the ES.</p>	<p>This information has been provided within the ES in Volume 3, Appendix Introduction, Annex 1 – Competent Experts and Relevant Expertise.</p>
The Proposed Development and Planning Application		
London Borough of Camden	<p>It is assumed that the quantum of development described in this section, and as updated by the updated description and red line plan provided in the EIA Scoping Report Addendum received on the 20th of April 2021, captures the maximum quantum and maximum red line extent that could be included with the planning application for the purposes of EIA scoping.</p> <p>Reference is made to the development being phased. A demolition and construction phasing plan should be included, and assessed, in the ES. The construction assessment in each technical assessment should include an intermediate year construction assessment, that looks at the impacts and effects to occupants of the earlier phases (that have been built and occupied) within the proposed development. This should consider construction disturbance from the construction of adjacent and</p>	<p>The EIA Scoping Report Addendum described the proposed development as providing 750 - 825 residential units and up to approximately 95,500m² of commercial floorspace. This is consistent with the quantum of development as presented in the ES and submitted in support of the planning application.</p> <p>No development has been proposed beyond the redline boundary presented in the Scoping Report Addendum. However, infrastructure improvements may be undertaken beyond the redline boundary to facilitate the development and improve connectivity with the surrounding areas as agreed with LBC. These infrastructure improvements have been addressed by the EIA where relevant to ensure that the full extent of the EIA ‘project’ is considered.</p> <p>The occupation of the Proposed Development is phased, as set out in ES Volume 1, Chapter 5: Demolition and Construction and within Figure 5.2.</p> <p>The Applicant has, for the purposes of the EIA, identified an ‘opening year’ for Phase 1 and an end date for completion of the entire Proposed Development, these being 2024 and 2030 respectively.</p>

	<p>subsequent phases, typically for a worst-case scenario, appropriate to each technical area on review of the planned phasing.</p>	<p>These dates are defined solely for the purposes of the EIA, specifically the assessment of the likely significant effects of the Proposed Development over a 9.5 year build programme and on completion and operation and for no other purposes.</p> <p>The phased occupation of the Proposed Development has been assessed, as appropriate in ES Volume 1, Chapters 6 to 13 and ES Volume 2.</p> <p>Addressed throughout the noise and vibration assessment using 'timeslices' to describe the phased development addressed by the impact assessment.</p> <p>The timeslices are presented in ES Volume 1, Chapter 9: Noise and Vibration paragraph 5.5 and within Annex 6 and described below:</p> <p>Timeslice 1 (No Development Plots of the Proposed Development will be occupied at this stage):</p> <ul style="list-style-type: none"> - Phase 1 Demolition and enabling works; - Phase 1 Foundations and substructure. <p>Timeslice 2 (First occupation of Phase 1 Development Plots will have taken place at this stage):</p> <ul style="list-style-type: none"> - Phase 2 Foundations and substructure; - Phase 4 (A) Foundations and substructure. <p>Timeslice 3 (First occupation of Phase 1 Development Plots will have taken place at this stage):</p> <ul style="list-style-type: none"> - Phase 2 Superstructure; - Phase 3 Demolition and enabling works; - Phase 3 Foundations and substructure; - Phase 4 (A) Superstructure. <p>Timeslice 4 (First occupation of Phase 1 and Phase 4 (A) Development Plots will have taken place at this stage):</p> <ul style="list-style-type: none"> - Phase 2 Superstructure; - Phase 3 Superstructure. <p>Timeslice 5 (First occupation of Phase 1, Phase 2, Phase 3 and Phase 4 (A) Development Plots will have taken place at this stage):</p> <ul style="list-style-type: none"> - Phase 4 (B) Foundations and substructure. <p>Addressed in ES Volume 1, Chapter 11, Wind Microclimate; paragraph 11.24 highlighting intermediate years assessed.</p> <p>Addressed in ES Volume 1, Chapter 6, Socio Economics and Health; paragraph 6.6.</p> <p>'The core assessment years align with the opening years of the different</p>
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		phases of the Proposed Development: 2025 (captures phases opening in 2024 and 2025) and 2030 (for 2028 and 2030)'.
Planning Context		
London Borough of Camden	Each technical assessment should include a review of the relevant aspects of planning policy and guidance in the ES, and this should be considered in the development of mitigation for the proposed development. It should be noted that the London Plan (2021) has now been adopted by the GLA.	Annex 1 of each of the technical Chapters 6-13 provides a review of the relevant legislative and planning policy context. The London Plan (2021) and other relevant planning policy have been considered and referenced throughout the ES, including in technical chapters and in development of mitigation (ES Volume 1, Chapter 16: Environmental Management, Mitigation and Monitoring).
EIA Methodology – Baseline Conditions		
London Borough of Camden	With regard to the COVID-19 pandemic, and potential survey work limitations, it is recommended that the collection of baseline data and the use of existing baseline data should be discussed and agreed with the relevant technical officers within LBC (and other statutory consultees, where relevant) where possible ahead of the ES being submitted.	It is noted that the traffic, air quality, noise and vibration assessments are based on baseline data for the 2019 calendar year. This data was gathered before any of the implications of Covid-19 occurred and as such the assessment of baseline conditions is unaffected by any issues (reduced background traffic, potentially reduced emissions etc.) relating to Covid-19. The original Preliminary Ecological Appraisal which was completed in June 2019, was also updated, however this wouldn't be affected by the covid-19 restrictions.
Demolition and Construction Impact Assessment		
London Borough of Camden	As previously identified, consideration should be given to an intermediate year construction assessment that assesses effects to occupants of the earlier phases whilst the later (especially adjacent) phases are under construction. Paragraph 53 of the EIA scoping Report identifies that a future baseline will be considered. We agree with this and commentary should be provided in each of the technical assessments on how the baseline conditions could change from the current baseline in the future. How baseline conditions could change (without the development going ahead) by the year of full completion, would be a relevant benchmark, for example. It is acknowledged that material changes could occur for some disciplines, but not necessarily all. Commentary should be made on whether such changes could affect the receptor sensitivity that has been identified during the existing baseline review.	Addressed throughout the noise and vibration assessment using 'timeslices' to describe the phased development addressed by the impact assessment. The timeslices are presented in ES Volume 1, Chapter 9: Noise and Vibration paragraph 5.5 and within Annex 6 and described below: Timeslice 1 (No Development Plots of the Proposed Development will be occupied at this stage): - Phase 1 Demolition and enabling works; - Phase 1 Foundations and substructure. Timeslice 2 (First occupation of Phase 1 Development Plots will have taken place at this stage): - Phase 2 Foundations and substructure; - Phase 4 (A) Foundations and substructure. Timeslice 3 (First occupation of Phase 1 Development Plots will have taken place at this stage): - Phase 2 Superstructure; - Phase 3 Demolition and enabling works; - Phase 3 Foundations and substructure; - Phase 4 (A) Superstructure. Timeslice 4 (First occupation of Phase 1 and Phase 4 (A) Development Plots will

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		<p>have taken place at this stage):</p> <ul style="list-style-type: none"> - Phase 2 Superstructure; - Phase 3 Superstructure. <p>Timeslice 5 (First occupation of Phase 1, Phase 2, Phase 3 and Phase 4 (A) Development Plots will have taken place at this stage):</p> <ul style="list-style-type: none"> - Phase 4 (B) Foundations and substructure. <p>Addressed in ES Volume 1, Chapter 11, Wind Microclimate; paragraph 11.24 highlighting intermediate years assessed.</p> <p>Addressed in ES Volume 1, Chapter 6, Socio Economics and Health; paragraph 6.6.</p> <p>'The core assessment years align with the opening years of the different phases of the Proposed Development: 2025 (captures phases opening in 2024 and 2025) and 2030 (for 2028 and 2030)'</p> <p>Transport only addresses one worst case scenario as per ES Volume 1, Chapter 7; paragraph 7.14:</p> <p>The 'evolution of the baseline' caters for a Future Baseline Do Nothing year where the Proposed Development is not implemented and assumes the Cumulative Schemes (provided within ES Volume 1, Chapter 2: EIA Methodology) have been built (i.e. complete and operational). The Future Baseline year comprises 2030.</p> <p>The complete development is the worst case scenario for the following assessments:</p> <ul style="list-style-type: none"> • Daylight, Sunlight, Overshadowing and Solar Glare • Built Heritage • Greenhouse Gases
	<p>Paragraph 59 of the EIA Scoping Report mentions that where required, monitoring arrangements will be presented in the ES. Commentary should be provided on whether the technical consultant recommends the need for any monitoring of significant residual effects, if there is the potential for these to remain as significant post-mitigation.</p>	<p>Monitoring of significant demolition and construction effects related to the protection of ground contamination and dust have been highlighted by technical consultants. It is recognised that, for high-risk sites in London, baseline monitoring for construction dust may be required as part of the mitigation measures; however, the requirement for, and scope of, any monitoring surveys is dependent upon the findings of the dust risk assessment. If baseline monitoring is required, it is suggested that a period of up to three months monitoring before construction begins should be sufficient and can be conditioned following planning approval as part of a wider condition to ensure appropriate dust monitoring is undertaken throughout the construction works. Dust measures include:</p>

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		<ul style="list-style-type: none"> • Measures to control and monitor air pollution, as specified in the London Council's guidance document 'The Control of Dust and Emissions from Construction and Demolition' • Carry out regular site inspections to monitor compliance with air quality and dust control procedures, record inspection results, and make an inspection log available to the LBC when asked; • Increase the frequency of site inspections by those accountable for dust and air quality pollutant emissions issues when activities with a high potential to produce dust and emissions are being carried out and during prolonged dry or windy conditions; • Record any exceptional incidents that cause dust and air quality pollutant emissions, either on or off the site, and ensure that the action taken to resolve the situation is recorded in the log book; and • Carry out regular dust soiling checks of buildings within 100m of the site boundary and provide cleaning if necessary; • Put in place real-time dust and air quality pollutant (PM10) monitors, as per any Section 61 agreement with the LBC as relevant (as detailed previously) across the site and ensure they are checked regularly; and • Agree monitoring locations with the LBC <p>The development shall not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports, has been submitted to the LBC. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the LBC. A number of mitigation measures shall be implemented throughout the enabling and construction works as a matter of course to protect people (human health) and the environment, as follows:</p>

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		<ul style="list-style-type: none"> • Measures to control and monitor air pollution, as specified in the London Council's guidance document 'The Control of Dust and Emissions from Construction and Demolition'; • Measures for the protection of hydrological resources and preventing contaminated runoff, settlement facilities and oil / petrol interceptors; and • Any piling works will require a Foundation Works Risk Assessment (FWRA). The FWRA will identify the requirement for any groundwater level / groundwater quality monitoring. Implementation and compliance with a Remediation Strategy (to be approved by the LBC). <p>Further details on monitoring can be found within <i>ES Volume 1, Chapter 16: Environmental Management, Mitigation and Monitoring</i></p>
Completed Development		
London Borough of Camden	<p>The ES should include a description of the quantum, massing, form and layout of the development. This should include the fixed details being put forward for the detailed component and the parameter plans, maximum (and potential minimum) quantum and design guidelines for the outline component as described.</p>	<p>To clarify, an outline planning application has been submitted for the Proposed Development.</p> <p>The ES (<i>ES Volume 1, Chapter 4: The Proposed Development. Paragraph 4.13 to 4.39</i>) includes a description of the quantum, massing, form, and layout of the development, including maximum parameters.</p>
	<p>A realistic worst-case scenario should be assessed for each of the technical assessments. If there is the potential for a lower quantum to be delivered which may lead to different effects, then this should also be considered. For example, a realistic lower limit for floor area and residential units to be delivered for the outline components should also be assessed in the socio-economics assessment if this will potentially lead to an effect that is different to the delivery of the maximum quantum proposed.</p>	<p>Worst-case scenario assessments have been undertaken in all technical chapters.</p> <p><i>ES Volume 1, Chapter 6: Socio Economics; paragraph 6.31 and Table 6.5</i> consider minimum and maximum floor areas/residential units (as below).</p> <p>'The Proposed Development will include between 750 and 825 residential units (dwellings). In order to be conservative, the worst case assumption of 750 dwellings being delivered has been applied to assess the Proposed Development's minimum contribution to local housing. This chapter assesses the contribution of these dwellings towards housing provision in LBC, through consideration of changes in housing tenure, price, and affordability'</p>
Cumulative Effects		

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London Borough of Camden	<p>Reference is made to assessing schemes with a full planning consent. To be clear, we would also expect that outline planning consents are also assessed, if they breach the wider criteria set out in the EIA Scoping Report</p>	<p>Comment previously addressed in ES Volume 3, Appendix: EIA Methodology – Annex 1 'LBC's Comments on the EIA Scoping Report'.</p> <p>Outline planning consents have also been considered as part of the cumulative assessment.</p>
	<p>It is noted that the criteria included below paragraph 65 of the EIA Scoping Report proposes the assessment of development projects that have been submitted for planning but that have not yet been determined. LBC agree with this position, so that the cumulative effects assessment is as up to date as possible at the time of submission of the planning application / at planning committee. However, it is noted that there is a contradiction in the criteria included in Appendix A, with reference made only to schemes that have a resolution to grant. The EIA should include a cumulative assessment of the relevant schemes submitted for planning ahead of the assessment work commencing.</p>	<p>Comments previously addressed in ES Volume 3, Appendix: EIA Methodology – Annex 1 'LBC's Comments on the EIA Scoping Report'.</p> <p>Development projects that have been submitted for planning but that have not yet been determined have been considered as part of the cumulative assessment.</p>
	<p>There is currently no mention of nearby sites, which have not yet been submitted for planning, that could be submitted at a similar time to the proposed development.</p> <p>Two schemes (Regis Road Growth Area and Gospel Oak/Haverstock) are however included in the schedule of cumulative development included in Appendix A. LBC agrees that there may be a need to consider proposed developments that are to be submitted at a similar time for planning, so that the cumulative effects assessment of such schemes are coordinated and consider each other. There are a number of nearby applications coming forward, notably for Euston, the extension to the British Library, O2 Finchley Road site, Selkirk House, Belgrove House, Acorn House, Royal National Throat, Nose and Ear Hospital and the Network Building (note only schemes within the zone of influence (within 1km) will needed to be considered within the ES). Some of these schemes have recently been submitted for planning and therefore will need to be considered if they meet the wider cumulative scheme criteria. It is recommended that the applicant discusses the need for consideration of any further schemes, not yet submitted for planning, with LBC ahead of the assessment work commencing (so that an up to date position, at that time, is agreed – including the need for a coordinated assessment with other parties).</p>	<p>Comments previously addressed in ES Volume 3, Appendix: EIA Methodology – Annex 1 'LBC's Comments on the EIA Scoping Report'.</p> <p>Nearby regeneration schemes, which have not yet been submitted for planning have been considered as part of the cumulative assessment.</p>
	<p>As indicated above, beyond the list of proposed cumulative development schemes included here, the list of proposed developments to be assessed should be re-reviewed (against the specified criteria) ahead of commencing the assessment work, if there is a delay between the issue of this EIA scoping opinion and the assessment work commencing. Ideally, this list is further discussed with LBC at that time. This will ensure that the list of cumulative development schemes is as up to date as possible at the time of the assessment work commencing.</p>	<p>Comments previously addressed in ES Volume 3, Appendix: EIA Methodology – Annex 1 'LBC's Comments on the EIA Scoping Report'</p>
	<p>The schedule of cumulative developments included in Appendix A of the EIA Scoping Report includes variations to original consents. The EIA should ensure that any variations to the original</p>	<p>Comments previously addressed in ES Volume 3, Appendix: EIA Methodology – Annex 1 'LBC's Comments on the EIA Scoping Report'.</p>

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	<p>consents, that may be material to the cumulative assessment, are considered: for example, consents approved via Section 73 of the Town and Country Planning Act 1990. There might be further amendment applications to be considered for example to the Travis Perkins site on 156 West End Lane and further amendment planning applications should be reviewed ahead of the assessment work commencing.</p>	
	<p>Whilst not part of the cumulative assessment, the technical assessments should have regard to impacts and effects to any future receptors in the vicinity of the site that may be affected. Specifically, this may include nearby planning applications / permissions that are lower than the thresholds defined in the EIA Scoping Report.</p>	<p>Comments already address in ES Volume 3, Appendix: EIA Methodology – Annex 1 'LBC's Comments on the EIA Scoping Report'.</p>
	<p>The ES should outline where any of the earlier phases of the identified cumulative schemes are constructed and occupied, and therefore considered to form baseline for the assessment.</p> <p>The assumed construction phasing of nearby cumulative developments should be outlined in the ES and where this is not clear from the associated planning documentation for those schemes, details should be provided on any assumptions made i.e. the potential for overlap of construction phasing if this represents a worst case for assessment purposes.</p>	<p>Comments previously addressed in ES Volume 3, Appendix: EIA Methodology – Annex 1 'LBC's Comments on the EIA Scoping Report'.</p>
Effect Interactions		
London Borough of Camden	<p>The EIA Scoping Report includes the following statement:</p> <p>“There is no established methodology for assessing the impact of cumulative effects on a particular receptor. The interaction of a combination of individual effects would be determined to be either ‘not significant’ or ‘significant’, a scale of the combined effects (minor, moderate or major) would not be applied.</p> <p>If one of the individual effects is significant the combination of effects would be regarded as ‘significant’. If none of the individual effects are significant the interaction of effects would be regarded as ‘not significant’.</p> <p>Whilst noting that there is no established methodology for the assessment of interaction effects, in theory a number of non-significant effects on the same receptor could combine to have a greater quantum of impact and therefore interactive effect overall. Such an effect could be significant if there were enough non-significant effects affecting the same receptor. It is therefore recommended that the ES provides clear justification on the significance of any interactive effects predicted.</p>	<p>The ES provides clear justification on the significance of any interactive effects predicted, in the ES Volume 1, Chapter 15: Likely Significant Effects and Conclusions, and in the likely residual effects section of each technical chapter (chapters 6 – 13) in the ES Volume 1, Chapter 14: Effect Interactions.</p>
Alternatives and Design Evolution		
London Borough of Camden	<p>As per the EIA Regulations 2017, the ES should include “a comparison of the environmental effects” when considering alternatives. For example, when discussing how the design has changed, this should include a high-level commentary on how the environmental effects could have been different from the eventual effects that have been predicted for the final proposed development as assessed in the ES.</p>	<p>A narrative is provided within the ES Volume 1, Chapter 3: Alternatives and Design Evolution, on the evolution of the selected option for the site, focusing on key design modifications that were made during the pre-application consultation and design evolution process and provides a comparison of environmental effects where relevant.</p>

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Determining Effect Significance – Effect Duration		
London Borough of Camden	<p>The EIA Scoping Report includes the following statement:</p> <p>“effects that are generated as a result of the demolition and construction works (i.e. those that last for this set period of time) will be classed as ‘temporary’; these maybe further classified as either ‘short term’ or ‘medium-term’ effects depending on the duration of the demolition and construction works that generate the effect in question. Effects that result from the completed and operational Proposed Development will be classed as ‘permanent’ or ‘long-term’ effects”.</p> <p>Whilst this is broadly agreed, it should be noted that permanent effects could occur as a result of demolition and construction works (i.e. where an asset or receptor has been changed permanently).</p> <p>For the topics scoped into the ES, this could for example include any direct effects (i.e. the removal of) on-site heritage assets as a result of the proposed redevelopment of the site. More specifically, there could be permanent effects associated with the partial demolition of the two locally listed locomotive sheds on the site. Therefore, any effects that are permanent should also be classified as such as a result of the demolition and construction phase of the proposed development.</p>	<p>Long term effects have been considered in respect of the demolition and construction works in acknowledgement that the build programme is 9.5 years in duration.</p>
Socioeconomics		
London Borough of Camden	<p>Refer to comments from NHS North Central London Clinical Commissioning Group, the LBC Economic Development officer.</p> <p>Note that the LBC Economic Development officer has queried whether effects associated with construction employment should be assessed and presented in the ES. The ES should therefore provide a response on this point (re-confirming, in response, that the effects are not deemed to be potentially significant and why or providing an assessment if appropriate). The LBC Economic Development officer has additionally raised a number of further points to be considered in bringing forward the proposed development.</p>	<p>In response to their query, construction effects have been scoped back in to (i.e., included within) the Socio-Economic impact assessment and are therefore considered in the ES chapter ES Volume 1 Chapter 6 Socio-Economics..</p> <p>These comments have been addressed in the consultation section of the upfront table in the ES Volume 1 Chapter 6 Socio-Economics.</p>
London Borough of Camden Economic Development	<p>We welcome the consideration of socio-economic impact as part of the EIA, given the potential of the scheme to deliver major change to the Kentish Town area, and the economies of the wider borough and London. The development proposes up to 95,000sqm of commercial floorspace, including 40,700sqm of industrial and up to 38,000sqm of flexible office/research and development. This level of new employment space is likely to bring a range of new businesses to the area. With the diversity of floorspace discussed as part of the application, we would expect to see measures to provide for and attract businesses of different sizes and types, creating a healthy commercial ecosystem at the development. This should include ensuring that appropriate start-up and move on spaces are provided at affordable rates for businesses across the variety of sectors in scope for the space created. The scoping report currently doesn't reference the affordability of</p>	<p>These comments have been addressed in the consultation section of the upfront table in the ES Volume 1, Chapter 6 Socio-Economics.</p>

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	<p>business space provided, or an increase in business start-ups, in the list of expected receptors or effects (para.110).</p> <p>A key priority is ensuring that the development delivers lasting benefits for local people. Camden is fortunate in being an attractive location for commercial development, but for neighbouring communities this can mean years of ongoing disruption through construction works, with many not feeling that they subsequently benefit from the new jobs and opportunities created. Whilst</p> <p>it's welcome that the report references the potential effects local around employment and skills, we would expect to see measures to ensure that Camden people specifically benefit from the end-use opportunities on the site. The report doesn't make reference to the quality of the opportunities created, for example around good pay (London Living Wage) or inclusive employment practices. We would expect the developer to work closely with our Good Work Camden programme, agreeing a package of commitments and facilitating relationships and mechanisms with occupiers to guarantee that these are delivered upon. This should include measures to ring-fence opportunities, and create pathways into quality jobs for local people.</p> <p>Whilst construction employment is temporary in nature, this development is significant in scale, covering 17 distinct plots. It is likely that construction on the site will last a number of years, providing ongoing opportunities for local employment. As with all major developments in Camden, we would expect applicants to work with our Kings Cross Construction Skills Centre to meet local labour targets, including agreed numbers of apprenticeships. Given the level of local employment likely to be created during the development phase, we would question its exclusion from the EIA.</p>	
NHS North Central London Clinical Commissioning Group	<p>Thank you for the opportunity to comment on this application which is a request for a scoping opinion under the EIA regulations for proposed development of the site. These comments are submitted on behalf of NHS North Central London Clinical Commissioning Group (CCG). They relate to the health and socio-economic topics identified in the scoping report. (See Page 8 of the Scoping Opinion for further details)</p>	<p>These comments have been addressed in the consultation table upfront in ES Volume 1 Chapter 6 Socio-Economics and Health.</p> <p>We have also responded to these comments in Table 4 of the HIA. The only one not specifically mentioned is the one under the planning context sub-head about referring to the Kentish Town Planning Framework SPD. The SPD was reviewed and is summarised in the planning context appendix.</p>
MET Police Design Out Crime Officer	<p>The proposed location of the development has the site sandwiched between railway lines and at the back of main roads. It is a large and awkward site. Crime and anti-social behaviour are material considerations for this proposal, as seen from current crime figures. This area comes under the wards of Highgate and Kentish Town. Anti-social behaviour, violence, shoplifting, burglary and other thefts are prevalent.</p> <p>Crime and ASB as material considerations for this site:</p> <p>The scoping report makes several references to potential receptors which may be impacted by the proposed development and may need to be considered as part of the assessment. Two of the receptors are directly relevant to crime and</p>	<p>The assessment of crime impacts in the ES Volume 1, Chapter 6: Socio-Economics and Health and the HIA are consistent with this response. The Designing Out Crime Officer (DOCO) presents data on top reported crimes in the local wards which is consistent with the Met Police data presented in the socio-economic assessment. We also agree with the view that crime and Anti-Social Behaviour (ASB) are material considerations for the site and, as such, these have been considered in both the socio-economic chapter and HIA.</p> <p>The socio-economic chapter and HIA explain that a number of workshops have been held with Designing Out</p>

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	<p>disorder: Socio-economics and Health (pages 26 and 29). Crime and disorder are relevant considerations and need to be addressed. In socioeconomic terms, the current crime trends in this area can have a negative impact upon the quality of life for both residents and businesses and could continue to do so for future residents and workers on this proposed site. The health impact assessment (HIA) sets out eleven broad determinants to health. One of those listed is crime reduction and community safety. In effect, a safe development with low rates of crime and ASB will also have a healthier and happier community which will be less worried about crime and the fear of crime and will not be exposed to its side effects.</p> <p>Initial concerns from the site: see pages 10-13 of the Scoping Opinion.</p>	<p>Crime and Anti-terrorism officers from the Metropolitan Police. They also describe how the proposed development would improve natural surveillance in the area, increase pride of place and deter crime, aligning with Crime Prevention Through Environmental Design (CPTED) principles. Just to note that we are not committing to SBD certification. The streets and public areas between buildings have been designed to be accessible and safe. The applicant has taken a proactive approach at an early stage in order to reduce risks and opportunities for crime and ASB.</p>
<p>London Borough of Camden Affordable Housing Development Coordinator</p>	<p>Tenure</p> <p>We would look to achieve the usual policy compliant 60/40% split between Social Affordable Rent and Intermediate Rent across the scheme. Shared Ownership is not supported in Camden due to very high property values, which result in Shared Ownership being unaffordable to the target income group.</p>	<p>Tenure: we are providing a policy compliant split of 60% London Affordable Rent and 40% intermediate rent</p>
	<p>Mix Size</p> <p>Advice would be to increase numbers of 2b4p units which are suitable for both families and sharers, and reduce number of 2b3p size homes. The scheme should also include some larger 3 and 4 bed family sized units.</p>	<p>Mix size: family sized accommodation has been maximised as far as possible and prioritised within the affordable tenures to contribute to the creation of a balanced and mixed community</p>
	<p>Intermediate Rent</p> <p>Intermediate rented housing must be affordable to those on income bands £31,950 - £42,600 – please note these income bands have been increased in line with 2019 earnings, and are detailed in the recently updated Camden Planning Guidance Document.</p>	<p>Intermediate rented housing: a range of household incomes of £30k-£60k as per the CPG has been assumed.</p>
	<p>Specialist Housing</p> <p>Preference would be for the Murphy's site to include some form of Specialist Housing – suggestions include specialist housing for people with Learning Disabilities, Supported Living scheme, or some form of Older Peoples Accommodation.</p>	<p>Specialist housing: the masterplan provides flexibility for specialist housing to come forward on the site which would complement the proposed C3 housing as well as the healthcare floorspace and deliver an alternative type of housing.</p>
	<p>Registered Providers</p> <p>During recent discussions, there have been clear indications that some Registered Providers would be interested in acquiring/managing the Specialist Housing element as well as any Social Affordable and Intermediate Rented units on schemes. The Specialist Housing element would be of particular interest to those Housing Associations that already have a Specialist Housing division within their organisation.</p>	<p>Registered providers: Specialist housing—C2 use is proposed, but is envisaged as complementary to the healthcare offer (rather than the C3 housing), although there is flexibility for this to be explored further at later stages.</p>
	<p>Community- Led Housing</p> <p>This item to be further explored in future discussions.</p>	<p>Community-led housing: the applicant notes that this is to be further explored in future discussions.</p>

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	<p>Wheelchair Provision</p> <p>All wheelchair units should be located within the Social Affordable Rent element of the scheme and not within the Intermediate Rent element, as "Need" for this cohort is not recorded when registering interest for Intermediate Housing.</p> <p>Wheelchair parking - Larger, (3 bed and upwards), family-sized wheelchair units require a dedicated parking space where possible, and ideally direct street access. This size of unit without a parking space will usually be difficult to let.</p>	<p>Wheelchair provision: refer to the Inclusive and Adaptable Homes and Wheelchair Housing Statement in the DAS.</p>
Traffic and Transport		
London Borough of Camden	<p>With reference to the potentially sensitive receptors specified in the EIA Scoping Report on page 33, this should also include Kentish Town Farm.</p> <p>There are no further specific comments on the scope of the Traffic and Transport ES chapter, beyond those provided by the LBC Highways officer and Transport for London (TfL (below) – which should be addressed in the ES.</p>	<p>Kentish Town Farm is considered as a receptor.</p>
London Borough of Camden Transport Officer	<p>The LBC Transport officer has confirmed a number of requirements. for the baseline data, to be used in the Transport Assessment (TA) and ES.</p> <p>With reference to TfL's comment on the Public Transport Accessibility Level (PTAL), it is recommended that the applicant discusses this point further with TfL as this may affect the assumed future baseline conditions to be reported in the ES.</p> <p>As raised by TfL, the ES should include an assessment / report on any potentially significant effects associated with non-vehicular traffic and transport, in addition to vehicular trips.</p> <p>The TA to accompany the ES should follow the format of TfLs latest Healthy Streets TA guidance, while also adhering to the TA guidance in CPG - Transport.</p> <p>All baseline data and traffic counts, with regard to vehicle, public transport and pedestrian numbers in the area, should be taken prior to (or adjusted for) the covid-19 pandemic.</p> <p>As Murphy's have recently relocated activities to an alternative site, baseline vehicle generation by the existing site should reference trip numbers both at full capacity and existing numbers.</p> <p>PTAL values across the site may improve as a result of the proposed development. Any reevaluation of the PTAL scores for the site should be agreed with TfL prior to submission of the ES and TA.</p> <p>As well as the Kentish Town Future Transport Context report produced by TfL, the Kentish Town Access Study (which accompanies the Kentish Town Planning Framework document) should be used for the production of the ES and TA.</p>	<p>All requirements have been acknowledged and taken into consideration in the Transport Chapter.</p> <p>Non-vehicular trips were not considered in detail on the basis that the number of such movements will be significantly lower than those associated with the operational stage of the Proposed Development combined with the fact that many such trips will take place outside of traditional peaks.</p> <p>With regard to non-vehicle trips during the operational phase, a worst case scenario has been considered and the findings of this are reported in the ES and TA (ES Volume 1, Chapter 7: Traffic and Transport and ES Volume 4).</p> <p>All baseline traffic and public transport data used in the ES and TA (ES Volume 1, Chapter 7: Traffic and Transport and ES Volume 4) has been taken from pre-Covid data sources. This is as discussed and agreed with LBC and TfL during pre-application discussions.</p>

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Transport for London	<p>The criteria applied to defining related cumulative development appears robust in principle in terms of scale and proximity.</p> <p>The statement at page 32 that "PTAL is expected to improve in the western section of the site in the future due to the increased number of rail services available from Kentish Town Station" may be inaccurate. Please can the applicant clarify the new services being referring to. Our current understanding is that PTAL at the site may increase due to new pedestrian routes decreasing the walk distances to existing public transport nearby, not any future increases in public transport service frequency or capacity.</p>	<p>TfL's online WebCAT PTAL tool was initially used to assess the site. The PTAL reports extracted from this for Gordon House Road showed a PTAL of 4 for 2021 rising to 5 in 2031. Interrogation of the data shows that this increase is mainly attributable to improvements in rail services.</p> <p>Further to the above, TfL undertook a test considering the effect that opening up new pedestrian routes within the site would have on its PTAL. These changes and associated improvements in site permeability demonstrate that these would create further improvements in the site's PTAL rating.</p>
	<p>We remind the applicant that the Kentish Town Future Transport Context report and its accompanying data should be used in production of the EIA and TA for the proposed development.</p>	<p>Data within the KTF Transport Context Report has been used as part of the ES and the Transport Assessment (ES Volume 1, Chapter 7: Traffic and Transport and ES Volume 4).</p>
	<p>The Worst Case Scenario at paragraph 149 includes no mention of non-vehicle traffic or transport which is not robust or acceptable. Please consider worst-case scenarios for non-driving modes.</p>	<p>Non-vehicular trips were not considered in detail on the basis that the number of such movements will be significantly lower than those associated with the operational stage of the Proposed Development combined with the fact that many such trips will take place outside of traditional peaks.</p> <p>With regard to non-vehicle trips during the operational phase, a worst case scenario has been considered and the findings of this are reported in the ES and TA (ES Volume 1, Chapter 7: Traffic and Transport and ES Volume 4).</p>
	<p>The application TA proposed to be appended to the EIA report must follow TfL's latest guidance here: https://tfl.gov.uk/info-for/urban-planning-and-construction/ and recent TfL Pre-Application advice issued to the applicant.</p>	<p>Paragraphs 1.1.3 and 1.1.4 of the Transport Assessment state:</p> <p>Pre-application discussions and a Transport Scoping exercise were undertaken with officers at London Borough of Camden (LBC) and Transport for London (TfL) and included the preparation of a detailed 'Transport Scoping Report & Initial Transport Assessment' (November 2020). In addition to this, various pre-application meetings were attended by LBC and TfL officers covering the scope and nature of the assessment and the transport and movement aspects of the proposals.</p> <p>Through the Scoping process it was agreed that, in addition to this TA, a Delivery and Servicing Plan (DSP), Framework Travel Plan (FTP), Outline Construction Logistics Plan (CLP) and a Car Parking Management Plan (CPMP) would be prepared to support the application. A Transport chapter within the ES (ES Volume 1, Chapter 7: Traffic and Transport) has also been prepared.</p> <p>Latest TfL guidance followed throughout.</p>
Air Quality		

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London Borough of Camden Sustainability Officer	<p>152. ...There have been no recent exceedances of the particulate matter PM10 and PM2.5 objectives at any monitoring location in Camden.</p> <p>The WHO air quality guidelines for PM₁₀ and PM_{2.5} should now be considered as these have been adopted by Camden and the New London Plan which is a material consideration. As such it is expected that there have been recent exceedances for particulate matter at the site.</p>	<p>Comments previously addressed in <i>ES Volume 3, Appendix: EIA Methodology – Annex 1 ‘LBC’s Comments on the EIA Scoping Report’</i>.</p>
	<p>154... With the mitigation measures in place, it is expected that residual construction dust and PM₁₀ effects would be not significant.</p> <p>Generally the approach is sound however it should be noted that it is expected that as part of the mitigation that monitoring will be required and baseline monitoring would normally be required for at least 6 months (ideally 12 months) prior to commencement, and the results used to inform interpretation of construction phase monitoring and any actions required to be taken to avoid exceedances.</p>	<p>Comments previously addressed in <i>ES Volume 3, Appendix: EIA Methodology – Annex 1 ‘LBC’s Comments on the EIA Scoping Report’</i>.</p>
	<p>159...</p> <ul style="list-style-type: none"> - A quantitative assessment of the impacts of the operation of the Proposed Development on concentrations of NO₂, PM₁₀ and PM_{2.5} from development generated road traffic emissions in the proposed year of opening; - A quantitative assessment of concentrations of NO₂, PM₁₀ and PM_{2.5} that future users of the Proposed Development will be exposed to in the year of opening; and <p>In line with CPG Air Quality, the application of atmospheric dispersion modelling to predicted NO₂ and PM₁₀ concentrations, both with and without the proposed development is required.</p> <p>Dispersion modelling shall be the carried out in accordance with Air Quality and Planning Guidance, London Councils (2007) and London Local Air Quality Management Plan Technical Guidance 2016. Modelling should not predict improvements to future years (future vehicle emissions or future background concentrations</p>	<p>Comments previously addressed in <i>ES Volume 3, Appendix: EIA Methodology – Annex 1 ‘LBC’s Comments on the EIA Scoping Report’</i>.</p>
Noise and Vibration		
London Borough of Camden	<p>With reference to the potentially sensitive receptors specified in the EIA Scoping Report on page 42, this should also include Kentish Town Farm (it should also be considered for other disciplines in the ES, where relevant).</p> <p>With reference to Agent of Change principles, the noise and vibration assessment / the planning application, should consider the potential impact of the development on the operation of nearby live venues (i.e. the O2 Forum).</p>	<p>Kentish Town farm is considered as a receptor.</p> <p>The operation of the Kentish Town Forum on the new residential receptors within the site (ie Agent of Change) has been assessed. The assessment is based on measurements completed on the site during a period when the Forum was fully operational (pre Covid-19).</p>
London Borough of Camden Pollution Planning Officer	<p>The applicant has to bear in mind that individual intermittent events shall not exceed an internal level of 45dB Lmax (fast time weighting) within habitable rooms. The number and noise level of individual noise events should be indicated in a noise report for assessment, together with appropriate mitigation measures to achieve this target level. A reduction of 13 dB(A) from the façade level may be assumed as the noise attenuation provided by a partially open window.</p> <p>They will need consider re-radiated noise into the building from vibration caused by mechanical</p>	<p>Overheating and noise is a detailed design consideration and will be addressed at the reserved matters stage</p> <p>The individual events from passing trains has been assessed and the likely mitigation measures required to meet appropriate internal noise levels outlined.</p> <p>The assessments consider the impact of vibration on the high sensitivity uses proposed</p>

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	<p>plant, wind, rail and roads and noise reflected from buildings, surfaces. In areas of high external noise levels, habitable rooms should be orientated/ located on facades most distant to major external noise sources. Where mechanical ventilation is required in areas of high noise levels and poor air quality, this should be silenced (acoustically attenuated) and the air intake should be from the cleanest aspect of the building.</p> <p>Overheating will also need to be considered in any assessment submitted.</p> <p>Building vibration should be measured in acceleration terms (VDV). Measurements of vibration should normally be taken on a building structural surface supporting a human body.</p>	
Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare		
London Borough of Camden	<p>In regard to paragraph 211, where relevant LBC would require an assessment not just to emerging future receptors under construction, but also to any other proposed residential development that could be affected that has had a planning application submitted at the time of the assessment work commencing. This is because such development could form a future receptor.</p>	<p>Owing to the relative distance, scale and planning status of the cumulative schemes list in ES Volume 1, Chapter 2: EIA Methodology, a cumulative scenario assessment is not required. However, it should be noted that Cumulative schemes 21 and 22 are included in the baseline condition.</p>
	<p>The EIA Scoping Report identifies that due to the proposed development site's proximity to railway lines, a solar glare assessment may be required which, if necessary, will be carried out when facade designs are finalised for the detailed elements of the hybrid application and when Reserved Matters Applications are submitted for outline elements of the hybrid application. The proposed assessment, if required, is qualitative in nature, considering the effect of the proposed development in absolute terms, rather than in comparison with a baseline condition.</p>	<p>Comments already addressed in ES Volume 3, Appendix: EIA Methodology – Annex 1 'LBC's Comments on the EIA Scoping Report'.</p>
	<p>Due to the proposed development's proximity to railway lines, a qualitative assessment of potential glare risk will be required to identify opportunities to build in glare risk mitigation through building massing and facade orientation or ground-mounted structures. This can be carried out independently of facade design detail by identifying the potential for solar reflections from plain facades being directed towards road and rail routes. The qualitative assessment should be carried out in accordance with the principles outlined in the Scoping Report for the selection of locations and viewpoints to be assessed and the assessment process, which follow typical practice for qualitative glare assessments for road and rail users. It would be sensible to agree the specific locations and viewpoints subject to assessment, where possible, with Network Rail and with the London Borough of Camden ahead of the assessment being undertaken. The assessment should also identify the potential for solar glare to affect buildings and amenity spaces within the proposed development sites, if this could be significant.</p>	<p>Comments previously addressed in ES Volume 3, Appendix: EIA Methodology – Annex 1 'LBC's Comments on the EIA Scoping Report'.</p> <p>For solar glare, as the Proposed Development is in outline, the required level of detailing to undertake a full solar glare assessment is not yet defined. Sensitive viewpoints have been identified and qualitatively assessed, with a full assessment to be carried out in future Reserved Matter Applications (RMAs), if necessary.</p>

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	<p>Unless it can be demonstrated qualitatively that any potential glare sources identified are to be obstructed / not significant, a quantitative assessment will be required when facade designs are finalised for the detailed elements of the hybrid application and when Reserved Matters Applications are submitted for outline elements of the hybrid application. This should include a quantitative assessment of the intensity of glare against a recognised threshold, above which visual impairment is likely. It would be sensible to agree the quantitative assessment criteria, where possible, with Network Rail and with the London Borough of Camden ahead of the assessment being undertaken.</p>	<p>Comments previously addressed in ES Volume 3, Appendix: EIA Methodology – Annex 1 ‘LBC’s Comments on the EIA Scoping Report’.</p>
Wind Microclimate		
London Borough of Camden	<p>With regard to the scenarios to be assessed mentioned below paragraph 241 and the reference to phased testing in paragraph 242, LBC would require one additional scenario in the ES. This will be the inclusion of Phase 1 of the proposed development, proposed at this stage in detail, alongside existing surrounds (baseline). This will be to demonstrate that Phase 1, in isolation – to be approved at this stage in detail, is unlikely to have a significant effect and that all the required mitigation for Phase 1 has been considered.</p>	<p>A outline planning application has been submitted for approval for the Proposed Development.</p> <p>The Parameter Plans put forward for approval are represented as development plots and do not include any additional detail on façade, materiality, location of entrances etc. However, the wind tunnel testing did assess an earlier hybrid model (part-detail and part-outline) including some additional detail which is not expected to result in any significant difference in results compared to if only maximum extents were represented and modelled. In addition to the wind tunnel testing, CFD modelling has been undertaken using a maximum extents model of all Plots representing the Proposed Development (shown on Figure 4.1 of ES Volume 2, Chapter 4: Proposed Development). The results of the CFD modelling is presented in Volume 3 Annex 3 and is used to compare and validate the results of the wind tunnel assessment of the hybrid proposals.</p> <p>Five configurations have been tested within the wind tunnel, as set out below (no landscaping has been included for testing in all configurations):</p> <ul style="list-style-type: none"> • Configuration 1: The Existing Site with Existing Surrounds (the Baseline Conditions); • Configuration 2: Proposed Development Phase 1, 2, 3, 4 (hybrid proposals) with Existing Surrounds; • Configuration 3: The Existing Site with Consented Cumulative Surrounds; • Configuration 4: Phase 1, 2, 3, 4 (hybrid proposals) with Consented Cumulative Surrounds; • Configuration 5: Phase 1 (hybrid proposals) in Interim Surrounds (Phase 2 and Phase 4(a) cleared and Phase 3 and Phase 4(b) in their existing baseline condition). <p>Furthermore, the concern/query regarding Phase 1 (in detail) interacting with the existing surrounds is no longer relevant as the detailed design including mitigation will be addressed in a later RMA.</p>

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	The ES should confirm the wind source and how many years of wind frequency data that have been included in the assessment. It would be helpful for this to be confirmed in advance of the ES being prepared.	This information is provided in the ES Volume 1, Chapter 11: Wind Microclimate; paragraph 11.25.
Built Heritage		
London Borough of Camden	Built Heritage Assessment – this document does not adequately reflect the proposals, particularly the intervention and works to the locally listed sheds. It states ‘The proposals include the retention and adaptation of the locally listed Locomotive Sheds. The Northern Shed will be retained and continue to function as Murphy’s offices, the Central Shed will be converted to provide new food and beverage uses, with limited alteration to its built fabric, while the South Shed will be partially rebuilt on its existing footprint, its roof altered and additional accommodation provided above’. This description significantly underplays the works happening to the sheds, which are very intensive. A detailed heritage appraisal will be required as part of the ES, to assess the significance of the locally listed buildings and the impact of the works on that significance.	The Built Heritage Assessment included within the EIA Scoping Report was based on the masterplan and is an initial baseline at this stage. The ES Volume 1, Chapter 13: Built Heritage , in addition to the Heritage Statement (appended to the ES) addresses the finalised proposals. This includes a review of the scoping, assessing views and proposed drawings.
Historic England	The listed building St. Alban’s Villas (list entry no.: 1379017) is erroneously associated with a location adjacent to the site, whereas it stands some way further north than indicated on Highgate Road.	Noted. This asset is erroneously cited within the preliminary Heritage Assessment that was submitted to the LBC as part of the EIA Scoping Report. Since preparation of this preliminary assessment and the updated assessment (ES Volume 1, Chapter 13: Built Heritage and ES Volume 3: Appendix Built Heritage – Annex 1), this asset has been removed from the assessment as no effects on it are anticipated.
	We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.	The assessment has considered built heritage assets within the site and within 500m of the site’s boundary (see ES Volume 3, Appendix Built Heritage - Annex 1; Figure 22)
	Also, given the proximity of the site to Hampstead Heath, development is likely to be prominent in the protected London Views Management Framework panorama 2, from Parliament Hill. It is important that built heritage and TVIA assessments are designed to ensure that all visual and other impacts on all heritage assets are fully understood. Section drawings, photomontage, verified view studies and kinetic views studies may all contribute usefully to this.	The London View Management Framework (LVMF) Panorama 2: Parliament Hill has been assessed by the Townscape and Visual Impact Assessment (see ES Volume 2). No impacts to any highly designated heritage assets within the panorama have been identified.
Council for British Archaeology	We have concerns about the Scoping Report’s statement that ‘The locally listed Kentish Town Locomotive Sheds ... are considered to be non-designated heritage assets’. We consider this to be incorrect, since Historic England has defined locally listed heritage assets as follows: • There may be many buildings and sites in a local planning authority’s area that make a positive contribution to its local character and sense of place because of their heritage value. Although such heritage assets may not be nationally designated or even located within the boundaries of a conservation area, they may be offered some	The inclusion of the sheds on a local list means they are “non-designated heritage assets” as defined by the NPPF. They should not be given the same status, or treated in the same way, as nationally listed buildings. However, they must be given consideration in the planning process and have been assessed as non-designated heritage assets in the ES (assets of low importance). The Glossary to the NPPF states that heritage assets can include both

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	<p>level of protection by the local planning authority identifying them on a formally adopted list of local heritage assets. ...</p> <ul style="list-style-type: none"> • Whilst local listing provides no additional planning controls, the fact that a building or site is on a local list means that its conservation as a heritage asset is an objective of the NPPF and a material consideration when determining the outcome of a planning application. ... • The NPPF contains policies that apply to heritage assets regardless of whether or not they are locally listed. However, local listing provides a sound, consistent and accountable means of identifying local heritage assets to the benefit of good strategic planning for the area and to the benefit of owners and developers wishing to fully understand local development opportunities and constraints. <p>The inclusion of the loco sheds in the local listings offers them the status of a heritage asset. It follows that they must be treated with the same consideration as if they were nationally listed, in order to meet NPPF and LPA requirements.</p> <p>The NPPF defines 'significance' succinctly as 'The value of a heritage asset to this and future generations because of its heritage interest [which] may be archaeological, architectural, artistic or historic'. Potential impacts on significance should be included in the ES. The reference to current and future generations is relevant in this case as regards previous and surviving railway works for example. Without sympathetic investigations 'significance' becomes circumstantial at best. Paragraph 200 of the NPPF advises: "Local planning authorities should look for opportunities ... within the setting of heritage assets, to enhance or better reveal their significance ... [and] should be treated favourably." The loco sheds are relevant; the NPPF clarifies that heritage assets don't have to be officially designated. Enhancing/revealing significance needn't be solely considered as visual enhancement but may encompass opportunities for community interaction.</p>	<p>designated and non-designated heritage assets, with the latter including local listing. The Locomotive Sheds are therefore considered non-designated heritage assets and are considered as such in accordance with paragraph 197 of the NPPF as part of this assessment.</p> <p>The ES Volume 1, Chapter 13: Built Heritage assesses the potential impacts on heritage assets. The Built Heritage Statement in ES Volume 3, Appendix Built Heritage – Annex 1 is based on the NPPF definition of the significance of heritage assets.</p> <p>In the context of EIA, the term '<i>significance</i>' is used to define whether a residual effect is significant or not (as defined by Table 13.3 of the Chapter 13). Therefore, to avoid confusion the term '<i>importance</i>' (rather than significance) is used within chapter 13 in respect of the values that the heritage assets hold.</p>
<p>London Borough of Camden Design Officer</p>	<p>Appendix D - Built Heritage Statement Boundary:</p> <ul style="list-style-type: none"> - Throughout document - red line boundary includes service yard behind Forum - How does recent acquisition of car wash site relate to site boundary/this application? <p>Extent/description of proposals to sheds:</p> <ul style="list-style-type: none"> - Level of intervention to sheds, and particularly central shed, is underplayed. Proposals show that roof would be removed, partially demolished, and in all likelihood re-built. Character of the building would be significantly altered and its significance diminished. - Section 4.1 states that "The Central Shed has is comparatively less altered and retains much of its original fabric and integrity. As such it is considered to most strongly reflect its origins and historic interest as a nineteenth-century locomotive shed and is of the highest significance of the three." - The roof itself is specifically mentioned as being of architectural and historic interest: "Particular features of note include the 	<p>Neither the Forum service area nor the Car Wash site is included in the planning application boundary. However, the Car Wash Site may facilitate access through a separate application for a bridge link to Kentish Town, assessed as part of the 'Infrastructure Initiatives'</p> <p>The application is made in outline, with the sheds currently subject to alteration, part demolition and extension. Further details will be provided in future reserved matters applications, which will follow the Design Code.</p>

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	<p>retained frame and roof structure of the Central Shed, which has remained largely unchanged since its construction in the nineteenth century" and is the largest element of surviving 19th century structure on the site.</p> <ul style="list-style-type: none"> - Oil-processing plant - do we agree with the assessment that this is not considered to be a non-designated heritage asset? <p>Listed buildings:</p> <ul style="list-style-type: none"> - Section 4.3 - The text states that setting of Christ Apostolic Church is considered to contribute greatly to the significance of the building. Next para states that the site makes no contribution to this. Part of the significance relates to its visibility and role as a marker and the visibility of the spires due to the low rise buildings around it - the unbuilt nature of the Murphy site behind supports this and enables the building to be read more clearly in the townscape. 	
London Borough of Camden Heritage Officer	<p>Text within Section 5 does not correspond with what is proposed.</p> <p>The Northern Shed is outside the red line. The proposed alterations go well beyond 'adaptation'. The section goes on to suggest that the alterations are required in order that the sheds could be retained. Alteration and retention are non-sequiturs.</p> <p>The impact of the proposed alterations should be sufficiently addressed within the ES and application submission, including the Heritage Impact Assessment</p>	<p>Comments already address in ES Volume 3, Appendix: EIA Methodology – Annex 1 'LBC's Comments on the EIA Scoping Report'.</p>
Climate Change		
London Borough of Camden	<p>LBC would require a dedicated GHG emissions ES chapter to be included in the ES. It is recommended that any assessment has due regard to IEMA's Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance (IEMA, 2017) (as is referenced in the EIA Scoping Report) and other good practice guidance such as Whole life carbon assessment for the built environment (RICS, 2017).</p> <p>The chapter should have regard to operational energy – based on predicted total energy calculations (as informed through the standalone energy statement) and embodied carbon from construction – based on the proposed development area schedule and published benchmarks. In addition, consideration should be made to whether an assessment is required for the other lifecycle stages in Figure 2 of the RICS (2017) guidance document, which is taken from BS EN 15978. If a justified reason can be given for scoping out a particular lifecycle stage, this should be explained in the methodology section of the greenhouse gas emissions ES chapter. It should be noted that the LBC Sustainability officer (as below) has highlighted the need to consider whole</p>	<p>The ES includes a GHG emissions chapter (ES Volume 1, Chapter 12: Greenhouse Gas Emissions), which has been prepared in accordance with relevant IEMA and RICS guidance.</p> <p>ES Volume 3: Appendix Greenhouse Gas Emissions – Annex 1 lists the appropriate planning policy.</p> <p>The ES chapter 12 assesses operational energy through paragraphs 12.57 to 12.66.</p> <p>As per Paragraph 12.7 and 12.8 the methodology is outline as follows: 12.7 The GHG assessment is based on a comprehensive GHG footprint for the Proposed Development, including emissions from construction and operational phases. The GHG footprint includes the following GHG emissions sources; each source is presented as a lifecycle module, in accordance with BSEN 15978 and RICS Whole Life Carbon Assessment for the Built</p>

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	<p>life cycle carbon emissions, in line with GLA guidance.</p>	<p>Environment (2017) for consistency with the Whole Life Carbon (WLC) assessment:</p> <ul style="list-style-type: none"> • Embedded carbon in construction materials (lifecycle modules A1-A3); • Construction site activities (lifecycle module A5); • Construction traffic (lifecycle module A4); • Building repair, maintenance and refurbishment (lifecycle modules B2-B5); • Operational energy consumption (lifecycle module B6); and • Operational transport (no lifecycle module applicable). <p>12.8 The following emissions sources have been scoped out of the GHG assessment:</p> <ul style="list-style-type: none"> • Water supply and treatment (lifecycle module B7); • Waste disposal (no lifecycle module applicable); and • End of life emissions (lifecycle modules
<p>London Borough of Camden Sustainability Officer</p>	<p>Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions, in line with the GLA Whole Life Carbon Guidance.</p> <p>Reference is made to assessing the potential impact of climate change on the proposed development in accordance with IEMA guidance "Climate Change Resilience and Adaptation (IEMA, 2015)". It should be noted however that IEMA released in June 2020 updated guidance on climate change adaptation and resilience. This provides guidance for considering climate change adaptation and resilience through the EIA process. It is recommended that the EIA process also has due regard to this guidance document. The guidance states that there are two key strands to assessing climate adaptation: 1.) risks of changes in climate to the project (i.e. the resilience or conversely the vulnerability of the of the project to future climate changes) and 2.) the extent to which climate exacerbates or ameliorates the effects of the project on the environment. It is recommended that the latter is assessed within each relevant environmental topic chapters, as is already being proposed in this case. It is considered acceptable that item 1 is considered in chapter 3 and chapter 4 of the ES.</p>	<p>This is addressed within the Circular Economy Statement and specifically the Whole Life Carbon Assessment submitted in support of the planning application, specifically in Appendix A.</p> <p>It can be confirmed that - IEMA 'Climate Change Resilience and Adaption' (2020) has been considered and applied throughout the ES as necessary. Reference to the 2015 guidance in the EIA Scoping Report was a typo.</p> <p>EIA Policy and Guidance considered throughout the ES can be found in Para 2.11 of ES Volume 1, Chapter 2: EIA Methodology and climate change has been considered in more detail in Volume 3, Appendix 3 Annex 2: Climate Change Note. Both documents refer to the IEMA 2020 climate change guidance.</p>
<p>Archaeology</p>		
<p>Greater London Archaeological Advisory Service</p>	<p>I therefore recommend attaching a condition (if a planning application is submitted and determined) as follows:</p> <p>No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. If</p>	<p>A planning condition has been recommended to be attached to the planning application in ES Volume 1, Chapter 16: Environmental Management, Mitigation and Monitoring.</p>

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	<p>heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing.</p> <p>I envisage that the archaeological fieldwork would comprise the following:</p> <p><u>Geotechnical Monitoring</u></p> <p>Archaeological monitoring of geotechnical pits and boreholes can provide a cost effective means of establishing the potential for archaeological remains to survive on previously developed land or where deep deposits are anticipated. It is usually used as part of a desk based assessment or field evaluation.</p> <p><u>Evaluation</u></p> <p>An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation.</p> <p>Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.</p>	<p>All archaeological work will be undertaken under the terms of a standard archaeological planning condition in consultation with the LBC's archaeological advisor, in accordance with an approved archaeological Written Scheme of Investigation (WSI). Following the above, it is considered that there are unlikely to be any significant residual effects arising from the Proposed Development in relation to below ground heritage/archaeology.</p>
Council for British Archaeology	<p>The CBA is disappointed about the scoping-out of Archaeology from the ES. We question the report's view that C19/C20 development and changes are of little or no interest; these matters form future archaeology, likely to be currently of interest to local communities and anyone studying the rapid expansion of London and its railway networks. Older OS maps show a plethora of development within the site relating to the railheads; loco sheds, gasworks with chimney, bottling stores, coal depot/shed etc. Just west of the site boundary was the Gospel Oak Brickworks including its quarry, kilns and chimney. These features are indicative of massive building programmes in London in the Victorian era. The National Library of Scotland website [https://maps.nls.uk/] offers free on-line access to available maps from mid-19th century on, by entering a grid reference to the search box.</p> <p>The report notes the potential for burials on the SE periphery of the site, in connection with the present Grade II listed Christ Apostolic Church, formerly St John's, on the site of the C18 Kentish Town Chapel (part of the walls of which survive). This possibility requires further study and possibly investigation.</p>	<p>As referenced in the Scoping Report and appended Archaeological Desk Based Assessment, the site contains no designated archaeological assets, does not lie within an Archaeological Priority Area and due to the sites historical and current industrial uses it has been subject to widespread disturbance and as such comprises a site of low theoretical potential for important archaeological remains. The response of GLAAS confirmed that any remains within the site associated with 19th century industrial activity (including the railway infrastructure) are likely to have been truncated and would be of local significance only. Therefore, it is appropriate for archaeology to be scoped out of the EIA.</p> <p>An archaeological watching brief shall be carried out during basement excavation to ensure that any previously unrecorded archaeological assets are not removed without record. All archaeological work will be undertaken under the terms of a standard archaeological planning condition in consultation with the LBC's archaeological advisor, in accordance with an approved archaeological Written Scheme of Investigation (WSI). Following the above, it is considered that there are unlikely to be any significant residual effects arising from the Proposed Development in relation to below ground heritage/archaeology.</p>
Council for British Archaeology	We also have concerns about valid points raised in Appendix E Archaeological Desk-Based	Built Heritage has been scoped in the ES with the assessment provided in ES

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	<p>Assessment [ADBA]. The observation that due to the 'size of the Site and the relative lack of archaeological investigations in the vicinity further archaeological mitigation measures may be required' appears to be at odds with the scoping-out of Archaeology and subsequent sole reliance on the ADBA. We are especially uneasy that any mitigation measures 'can follow the granting of planning permission, secured by an appropriately worded archaeological planning condition'. LPAs generally require adequate investigation and reporting ahead of an application's determination. We believe that, once a planning application has been determined in the form applied for, it may be too late to re-design a site if archaeological work is deemed necessary by the LPA. Post-determination conditions should be a last resort and not regarded as a standard approach.</p> <p>The CBA's view is that Built Heritage and Archaeology are part of the same topic and (for EIA development) if one is scoped-in the other should be too, ideally as a single combined chapter in the ES.</p>	<p>Volume 1, Chapter 13: Built Heritage.</p> <p>From an EIA perspective there is no need to group built heritage and archaeology together as they deal with different aspects of heritage assets, built heritage dealing with those visible above ground and archaeology dealing with potential buried heritage assets). While the link between above and below ground heritage is not disputed, the approach taken is not uncommon.</p>
Council for British Archaeology	<p>(a) Notwithstanding the report's stated intention for scoping-out Archaeology, we recommend that Built Heritage and Archaeology be jointly assessed in a combined Cultural Heritage chapter, linked to Townscape and Visual Impact within the Environmental Statement;</p> <p>(b) Advance Desk-Based Assessments (DBA) should be prepared and the results included in the ES as part of the planning application. These should include assessments of relevant published accounts; the settings of heritage assets around and within the site including The Forum with its two listed neighbours to the south, the Christ Apostolic Church site and the loco sheds, along with the settings of proximate Conservation Areas. The ES should include a written commitment to further work and mitigation if results indicate potential adverse impacts on heritage or its significance.</p> <p>(c) For any necessary physical works advice should be sought from Historic England and the LPA's Conservation specialists or other qualified archaeological advisors to be undertaken, if required, in accordance with a written scheme of investigation (WSI). Such works should preferably be completed and reported on at application stage, rather than via planning conditions post-determination (if approved). Reporting should include written commitment to fulfilling mitigation programme/s.</p> <p>(d) The ES should also include written commitment to facilitating community engagement with cultural heritage, recognising the potential for social value and bearing in mind the definitions of 'significance' in the NPPF/NPPG.</p> <p>(e) Attention is drawn to a requirement for written commitment from the applicants to publishing publicly available reports of all investigations even if of a negative outcome.</p>	<p>See GLAAS response below.</p> <p>The scoping out of archaeology is based both on our assessment work (the production of the Archaeological DBA which is based on HER data and previous investigations in the local area) and the GLAAS response.</p> <p>The DBA has been produced in accordance with ClfA guidance to understand the archaeological potential of the site and concluded that any archaeological remains are likely to be of local significance only and to have been truncated by previous development</p>
Greater London Archaeological Advisory Service	<p>(Response to CBA above)</p> <p>The site does not lie within an Archaeological Priority Area (APA). The Camden APAs were review only a couple of years ago and so the justification from the APAs is based on up to date evidence. Schedule 3 Section 2c (viii) of The Town and Country Planning (Environmental Impact</p>	<p>This feedback provided by the Greater London Archaeological Advisory Service responds to the feedback obtained from the Council for British Archaeology as seen above.</p>

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	<p>Assessment) Regulations 2017 stipulates that development must consider sites of archaeological significance. The site's location outside a locally designated APA indicates that the site is not considered to be a site of archaeological significance.</p> <p>Whilst I acknowledge that the remains of railway infrastructure is of some interest, such remains are not unique, particularly in London, and would be considered to be of low/local significance.</p> <p>There is some potential for palaeoenvironmental remains associated with the Fleet River, however the survival is unlikely to be extensive due to the impact of the railway infrastructure.</p> <p>The significance of the Palaeoenvironmental remains will have therefore been compromised.</p> <p>In regards to the issue of burials, it is unlikely that burials extended into the application site, however given the sensitivity of such human remains it should form part of a research question for the next stage of archaeological investigation in order to ensure that there are definitely no burials within the site.</p> <p>Overall I still do not feel that development of this site will result in a "significant effect" as set out under EIA regulations. Based on the evidence there is unlikely to be archaeological remains of national significance that would require preservation in situ through design. There will obviously still be some impact to locally significant archaeological remains, and given the scale of the site, a programme of archaeological fieldwork in accordance with a planning condition a planning (if a planning application is submitted and determined) would be an appropriate and proportionate strategy for this site.</p> <p>One option that I think we should encourage the developer to accommodate is to use the history of the site (particularly its railway heritage) to influence the design, perhaps through interpretative landscaping, public realm artwork and information panels.</p>	
Ecology		
LBC Nature and Conservation Officer	<p>I don't have a problem with ecology being scoped out of the formal EIA process. However, given the significant areas of SINC adjacent I would still expect an EcIA sufficient to identify the impacts from the proposals. The Biodiversity Net Gain assessment will be welcome but comes after the avoid-mitigate-compensate hierarchy and won't assess indirect impacts on the SINC, which'll include light pollution and other urbanisation impacts, which will need a robust solution.</p> <p>Potential shading impacts on the habitats within the adjacent non-statutory designated site of Kentish Town City Farm, Gospel Oak Railsides and Mortimer Terrace Nature Reserve SBINC, are likely to be insignificant, given that those areas of the SBINC to the north and north-east of the site include woodland habitats, which are likely to be</p>	<p>A Preliminary Ecological Appraisal was completed in June 2019, however and updated Phase 1 Habitat Survey was undertaken in May 2021.</p> <p>An Ecological Impact Assessment (EcIA) has been completed as requested and appended to the ES.</p> <p>A Biodiversity Net Gain Report was submitted with ES.</p> <p>An Ecological Impact Assessment (EcIA) has been undertaken as requested and appended to the ES, addressing these impacts on habitats adjacent to the site.</p>

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	<p>already shaded habitats and should be resilient to any increased shading.”</p> <p>Shade-tolerance strategies of woodland plants include, for example, early season growth to complete flowering prior to complete canopy growth of trees, which permanent buildings may impact. We would expect further consideration of this as per the PEA, which states:</p> <p>“The height and aspect of proposed new buildings adjacent to SBINC may lead to shading impacts on adjacent habitats. Should further information on shading impacts be required then specialist input is recommended.”</p> <ul style="list-style-type: none"> - “If the scattered trees on the boundaries of the site are to be removed, any effect is considered unlikely to be significant due to their limited local value;” <p>No doubt further information on this will be provided so the impact on biodiversity can be judged when known.</p> <ul style="list-style-type: none"> - “Provided an informed lighting plan is submitted, and there will be no additional light spill onto the boundary habitats and the adjacent railside habitats (including the Kentish Town City Farm, Gospel Oak RAILSIDES and Mortimer Terrace Nature Reserve SBINC) there is not considered to be any potential significant effects on commuting and foraging bats.” <p>‘Informed’ suggests informed by information regarding the use of these areas by commuting and foraging bats so the scale of potential impact and mitigation/avoidance can be judged, and we would expect a bat activity survey of SINC corridors adjacent to the site.</p> <ul style="list-style-type: none"> - “Potential impacts and legislation breaches relating to breeding birds will be mitigated by timing vegetation removal / building demolition works to avoid the bird nesting season, or by a suitably qualified ecologist undertaking a check for nests immediately ahead of works commencing during the bird breeding season and protection of any active nests until the young have fledged. It is proposed to scope breeding birds out of the assessment as any potential effects will be avoided by following standard mitigation measures as presented within the PEA.” <p>With regard to breeding birds the PEA only refers to avoiding breaching the legislation and enhancements. We expect impacts on bird breeding and foraging habitats to be adequately identified and mitigated through provision of replacement habitat where necessary.</p>	
<p>Geoenvironmental – Land Contamination, Ground Conditions, Soil and Groundwater</p>		

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London Borough of Camden EHO	<p>The Conceptual model produced is comprehensive and the initial investigation satisfactory. The need for a remediation strategy to be designed and approved by the LPA has been successfully identified and any full application would be expected to provide full details of the remediation measures required and how they are to be undertaken. A verification to demonstrate that the works set out in the remediation strategy are complete and identify any requirements for the longer monitoring of pollution linkages, maintenance and arrangements for contingency action should also be provided.</p> <p>As already stressed in the past, ground gas monitoring and subsequent assessments should also be fully considered. Any investigation and risk assessment must be undertaken in accordance with the requirements of the Environment Agency's Model Procedures for the Management of Contamination (CLR11 / now LCRM)</p> <p>Radon Paragraph 8.7.9 of the report on ground investigation reads that "the site lies within an area where radon protective measures are not required." If redevelopment of Murphy's Yard commences above formation level, I agree the radon risk is negligible and no radon protection measures are necessary. However, if redevelopment has basement provisions, this raises health concerns for the occupants. This concern is based on the Radon guidance BR 211 (2015), which notes that all basements are at increased risk of elevated levels of radon regardless of geographic location, because more walls are in contact with the ground as well as the floor, and reduced natural ventilation below ground level increases the risk of elevated radon levels.</p> <p>If applicable and the proposal has basement provisions the potential radon risk can also be addressed via condition (if a planning application is submitted and determined).</p>	<p>Comments already address in ES Volume 3, Appendix: EIA Methodology – Annex 1 'LBC's Comments on the EIA Scoping Report'.</p>
	<p>Asbestos</p> <p>The contamination assessment report confirms that asbestos surveys were carried out for all buildings on site and the relevant risk was "moderate". A full application would be expected to contain an appropriate mitigation scheme to control risks to occupiers. The scheme must be written by a suitably qualified person and submitted to the Local Planning Authority (LPA) for approval. The scheme should detail removal or mitigation appropriate for the proposed end use and shall be independently verified.</p>	<p>Comments already address in ES Volume 3, Appendix: EIA Methodology – Annex 1 'LBC's Comments on the EIA Scoping Report'.</p>
	<p>Unexploded Ordnances</p> <p>The Archaeological Desk Based Assessment confirms that the site appears to have been impacted by UXO during WW2, but no further comment was offered. It is therefore recommended that a detailed UXO assessment is undertaken and provided to the main contractor who is responsible for the health & safety of site workers and the public under the Construction (Design and Management) Regulations.</p>	<p>The Archaeological Desk Based Assessment made note that the site had suffered bomb damage during the Blitz leading to alterations to a number of the Sheds on site.</p> <p>It is suggested that the LBC secure the need for review and approval of a UXO assessment through a suitably worded planning condition. The UXO assessment would confirm the UXO risk</p>

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		level for the site, and if necessary, would provide recommendations for the most appropriate risk mitigation measures for the site in order to support ground works so that they proceed safely. It is suggested that the planning condition be a pre commencement condition. ES Volume 1, Chapter 16: Environmental Management, Mitigation and Monitoring is consistent with this proposed approach. Though the implementation of appropriate UXO risk mitigation measures, significant residual effects relating to UXO are not considered likely.
Waste		
London Borough of Camden Sustainability Officer	<p>399. ...between 90% and 95% of waste materials have been recovered and re-used or recycled.</p> <p>It should be noted that the New London Plan states that waste planning authorities and industry working in collaboration to: to meet or exceed the targets for each of the following waste and material streams:</p> <p>a) construction and demolition – 95 per cent reuse/recycling/recovery</p> <p>b) excavation – 95 per cent beneficial use 16</p> <p>407. ...A Circular Economy Statement will be prepared and submitted alongside the planning application which would address waste and material for all life stages of the Proposed Development. Referable applications should promote circular economy outcomes and aim to be net zerowaste.</p> <p>A Circular Economy Statement should be submitted, to demonstrate:</p> <ol style="list-style-type: none"> 1) how all materials arising from demolition and remediation works will be re-used and/or recycled 2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life 3) opportunities for managing as much waste as possible on site 4) adequate and easily accessible storage space and collection systems to support recycling and re-use 5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy 6) how performance will be monitored and reported. 	<p>A Circular Economy Statement was completed for the Proposed Development and submitted as part of the planning application. Please see this document for further detail.</p> <p>A Circular Economy Statement was completed for the Proposed Development and submitted as part of the planning application. Please see this document for further detail.</p>
Water Resources, Flood Risk and Drainage		

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London Borough of Camden	<p><u>Strategic Flood risk Assessment (SFRA)</u></p> <p>Although the report's observations are generally correct, it has not made reference to the historical major flooding of Highgate Road (1975 – shown orange in SFRA map extract).</p> <p>Insofar as the site is close to this road, it would be prudent to proceed as if the scheme were in an area at risk of flooding, in the meaning of the Camden Local Plan.</p>	<p>Due to the site's area exceeding 1 hectare a site-specific Flood Risk Assessment has been undertaken and has been submitted in support of the planning application. The FRA has been prepared in accordance with the requirements of the NPPF 2019 and:</p> <ul style="list-style-type: none"> • Identifies and assess potential sources of flooding to the site; • Assesses historical flood events associated with the site; • Assesses the potential impacts of the Proposed Development upon the local hydrological regime; • Outlines strategies to manage the flood risk to the site and local area allowing for future climate change; • Proposes a surface water management strategy including the implementation of Sustainable Drainage Systems to control volume of runoff and water quality; • Proposes measures for the management of residual risks; and <p>Identifies access and egress arrangements during extreme rainfall events.</p>
	<p><u>Flood Risk Assessment (FRA)</u></p> <p>Given the scale and unity of the Kentish Town Framework area, the FRA exercise should be undertaken as far as possible in conjunction with the owners of neighbouring plots in the same.</p> <p>The measures implemented and (with/without development) overland flows will all be interlinked in effect and should be coordinated appropriately.</p>	
	<p><u>Drainage strategy</u></p> <p>For reasons similar to those given above regarding the need for a unified FRA, we would expect to see the drainage strategy for this prospective planning application taking into account the nature and impacts of anticipated neighbouring development. As far as possible, the applicant should be asked to work with landowners and developers of adjacent plots within the Planning Framework area.</p> <p>We would expect to see infiltration tests undertaken at representative and promising locations, prior to the planning application, as part of the work done to prepare the Drainage Strategy.</p>	
London Borough of Camden Sustainability Officer	<p>In addition to the observations in the EIA scoping report, it is expected that due to the scale and location, at planning stage the applicant will submit:</p> <ul style="list-style-type: none"> - Flood Risk Assessment and Surface Water Drainage Statement - Camden Flood Risk Pro-forma as well as the GLA SuDS Pro-forma - Basement Impact Assessment - if appropriate - Supporting documents including drawings detailing the proposed drainage, extent and position of SuDS, and flood risk mitigation measures, Microdrainage or equivalent runoff and volume calculations, lifetime maintenance plan for SuDS including management of related health and safety issues, drawing of overland flow routes showing no increased risk to the public and surrounding properties, evidence of site surveys and investigations relating to drainage, capacity confirmation from Thames Water or evidence of correspondence. <p>The proposals will be expected to meet the NPPF standards, national non-technical standards, London Plan policy and Camden policy and guidance for development in a surface water flood</p>	<p>Supporting documents included in the submission:</p> <p>Flood Risk Assessment and Surface Water Drainage Statement – submitted with planning application.</p> <p>Camden Flood Risk Pro-forma as well as the GLA SuDS Pro-forma – submitted with planning application, the GLA is within the Flood Risk Assessment as an appendix and also to be submitted in excel format.</p> <p>Basement Impact Assessment – submitted with planning application.</p> <p>Supporting documents all covered within the Flood Risk Assessment submitted with the planning application.</p> <p>Addressed in documents above.</p>

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	<p>risk area. For example, the designs should (include but not limited to):</p> <ul style="list-style-type: none"> - be designed to resist flooding and to cope with being flooded - achieve greenfield run-off rates - constrain run-off volumes to greenfield run off volumes for the 1 in 100 year 6 hour event - include SuDS unless demonstrated to be inappropriate - follow the drainage hierarchy in policy SI 13 of the London Plan 	
Thames Water	<p>Thames Water considers the following issues should be considered and covered in either the EIA or planning application submission:</p> <ol style="list-style-type: none"> 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met. 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 3. The developments demand for water supply and network infrastructure both on and off site and can it be met. 4. Build – out/ phasing details to ensure infrastructure can be delivered ahead of occupation. 5. Any piling methodology and will it adversely affect neighbouring utility services. The developer can obtain information to support the EIA by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development 	<p>It is proposed to maintain the existing foul water connection from the existing on site vehicle car wash, existing offices and warehouses and hard standing areas within the site, to three discharges to the Fleet Trunk Sewer. An additional new connection added to the northern area of the site is also proposed. A pre-development enquiry has been issued to Thames Water on this basis, and their response is currently awaited. Any infrastructure upgrades will be discussed and agreed with Thames Water as necessary.</p> <ol style="list-style-type: none"> 1. ES Volume 1, Chapter 4: Proposed Development provides details as to the proposed surface water drainage and flood risk for the Proposed Development, including proposed surface water drainage methodologies, proposed drainage rates and how this will be implemented through connections to the Thames Water network and during the phased development of the site. 2. The Applicant will consult with Thames Water during and once the design of the Proposed Development is detailed and is subject to reserved matters, to discuss and agree the anticipated demand for water supply. Any infrastructure upgrades will be discussed and agreed with Thames Water as necessary. 3. The Scoping Report¹ outlines a temporary surface water management strategy will be implemented by the contractor during the construction works phase. This should, where possible, utilise a staged Sustainable Drainage Systems implementation regime whereby the final drainage strategy is brought online incrementally. Details of the anticipated programme and phasing are included in ES Volume 1, Chapter 5: Demolition and Construction. 4. A detailed construction method statement (CMS) in addition to other supporting management plans will

¹ ES Volume 3, Appendix: EIA Methodology – Annex 1 Scoping Report

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		<p>be prepared and issued to the LBC and others as relevant for approval prior to the start of works on site where relevant; the requirement for the method statements and management plans can be secured by the LBC through the use of suitably worded planning conditions.</p> <p>ES Volume 1, Chapter 16: Environmental Management, Mitigation and Monitoring confirms the future undertaking of a Foundation Works Risk Assessment and a Piling Method Statement. A draft Construction Environmental Management Plan (CEMP) has been submitted alongside the Planning Application. The draft CEMP will be updated to a detailed CEMP, to include a site wide framework and then phase specific management plans as relevant subsequent to planning approval, followed by the detailed design of the Proposed Development at reserved matters and the appointment of a contractor. The detailed CEMP/s will be agreed with the LBC and will be implemented throughout the duration of the demolition and construction works on site.</p> <p>Through appropriate consultation with Thames Water (which has been initiated by the Applicant), in addition to the LBC securing through appropriate planning conditions the requirement for details regarding foul and surface water drainage, potable water supply and risk assessments and method statements relating to below ground works, significant residual effects associated with these aspects are not considered likely.</p>

Please do let us know if you'd like a further discussion (over the phone or via an interactive meeting) should you have any queries.

Kind regards,



Melissa Phillips-Maskry

Principal Consultant
For and on behalf of Trium Environmental Consulting LLP
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