

Murphy's Yard

Independent Review of Environmental Statement dated June 2021

BHE-01

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7 March 2022

Revision P02

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P01	Independent Review of Environmental Statement dated June 2021 – initial draft for discussion with LBC	MC	14.02.22
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date **7th March 2022**

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date **7th March 2022**

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1 Introduction

1.1 Buro Happold's role

Buro Happold has been appointed, by the London Borough of Camden (LBC), to provide independent Environmental Impact Assessment (EIA) advice for the Murphy's Yard site.

Buro Happold's commission, for this project, includes input to the following stages of the EIA process:

1. Scoping Stage – independent review of EIA scoping report;
2. Pre-application Stage – on-going advice to LBC on EIA matters; and
3. Application Stage – independent review of Environmental Statement (ES).

This report focusses on item 3, the application stage, and summarises Buro Happold's independent review of the ES for the proposed development dated June 2021.

1.2 The project / application context

The Applicant (Folgate Estates Limited) is seeking outline planning permission for the redevelopment of a 6.22 hectare (ha) area of land ('the site'). The site is to the south of Gordon House Road bounded by railway lines to the east, west and south, known as 'Murphy's Yard', within the administrative boundary of the London Borough of Camden ('LBC'). It is irregular in shape and currently comprises industrial land with a number of buildings including storage units, offices, warehouses and locomotive sheds. The site predominantly includes areas of hard standing, with carparking spaces and some surrounding vegetation such as trees and grass which are located around the site perimeter.

The proposal for the site (hereafter referred to as the 'proposed development'), for which planning permission is sought, as stated within the Planning Statement, comprises:

"Outline planning permission with all matters reserved for the demolition of existing buildings and structures and redevelopment to be carried out in phases (with each phase being an independent act of development) comprising the following mix of uses: residential (Use Class C3), residential institution (Use Class C2), industrial (Use Class B2 and/or B8), commercial floorspace (Class E), flexible commercial and Sui Generis floorspace (Use Class E and/or Sui Generis Use), Community (F1 and/or F2), Sui Generis, and cycle and vehicle parking, refuse and recycling storage, plant, highway and access improvements, amenity space, landscape and public realm improvements, and all associated works."

1.3 The Environmental Statement

The ES subject to this independent review has been prepared with input from the following consultants:

- EIA Coordination – Trium;
- Socio-Economics – Volterra Partners;
- Traffic and Transport – Curtins;

- Noise and Vibration – Sandy Brown;
- Air Quality and Greenhouse Gas Emissions – Air Quality Consultants;
- Wind Microclimate – Windtech Consultants (Europe) Limited;
- Daylight, Sunlight, Overshadowing, Light Pollution and Solar Gale – GIA;
- Built Heritage – RPS;
- Townscape, Conservation and Visual Impact Assessment – Peter Stewart Consultancy;
- Construction Management – Stace Construction and Property Consultants; and
- Planning Consultant - DP9.

2 Review team and responsibilities

Buro Happold has provided a generalist review of the entire ES with regard to ES process. This has been or is being further supported by a number of specialist reviews from within Buro Happold and the relevant planning and technical officers at LBC. The BRE will additionally be reviewing the daylight, sunlight and overshadowing assessment and this is currently underway at the time of this report being published. The review team responsibility is set out in Table 2-1.

Table 2-1 ES review team and responsibilities

Company	Individual	Qualifications and position	Responsibility for reviewing
Buro Happold EIA / Environmental Assessment & Management Team	Mark Crowther	BSc (Hons), MSc, CEnv, MIEMA. Associate Director and Head of EIA at Buro Happold	The entirety of the ES from a generalist perspective. This has included a specific focus on EIA process, compliance with the EIA Regulations (2017) (as amended), IEMA EIA Review Criteria and LBC EIA Scoping opinion
	Helen Lund	BSc (Hons), PIEMA. Associate EIA Consultant	Compliance with the IEMA review criteria
	Anna Whiter	BSc (Hons), MSc, MSc (DIC), AIEMA EIA Consultant	Compliance with the LBC EIA Scoping Opinion
Buro Happold Technical Specialists	Bernardo Vasquez	BSc, MSc, PhD Associated Director Service Lead for Wind Microclimate Assessment at Buro Happold Permanent member of the Board of the Wind Engineering Society UK (WES).	Wind Microclimate ES Chapter
	Neil Shankland	BEng, PhD. Senior Engineer Chartered Engineer with membership of the Chartered Institution of Building Services Engineers.	Solar Glare component of Daylight, Sunlight, Overshadowing and Solar Slare ES Chapter
	Tom Peacock	BSc, MSc Greenhouse Gas Emissions assessment lead at Buro Happold	Greenhouse Gas Emissions ES Chapter
BRE	(Note a review is currently underway – therefore the outcome of this review will be communicated separately)		Daylight, Sunlight, Overshadowing and Solar Glare ES Chapter

Company	Individual	Qualifications and position	Responsibility for reviewing
London Borough of Camden		(Note a number of technical officer responses are not yet available and will therefore need to be considered in addition to this report)	The following ES Chapters: <ul style="list-style-type: none">• Socio-Economics• Traffic and Transport• Noise and Vibration• Air Quality• Built Heritage• Townscape, Conservation and Visual Impact Assessment

3 Review process methodology

3.1 Structure of the review

This ES review has been structured around the format of the submitted ES as follows:

- Each of the chapters in ES Volume 1 (the main report) has its own review chapter in this document;
- There are separate chapters in this report that review ES Volume 2 (townscape, conservation and visual impact) and the Non-Technical Summary (which is additionally a separate volume of the ES); and
- The technical appendices included in ES Volume 3 and ES Volume 4 have been considered in the technical chapter reviews associated with ES Volume 1 (as they form appendices to these chapters).

3.2 Compliance review

The ES review process has focussed on compliance with the following:

- The LBC EIA scoping opinion (adopted June 2021)¹;
- The EIA Regulations 2017 (as amended); and
- The Institute of Environmental Management and Assessment (IEMA) ES Review Criteria guidance.

The topic-specific technical review experts have additionally reviewed ES chapters against topic-specific guidance where necessary.

3.3 Recommendations

Following the compliance review, a number of recommendations have been made to LBC. The recommendations include the following:

- Recommended clarifications – where further information is required to confirm that the information provided is sufficient in satisfying the requirements of the EIA Regulations;
- Recommended Regulation 25 requests for “further information” under the EIA Regulations – to satisfy the requirements of the EIA Regulations; and
- Further recommendations as required to LBC – for example on the need for planning conditions etc.

¹ As per paragraph 2.29 of Chapter 2: EIA Methodology, it is noted that Trium did not obtain LBC's Scoping Opinion Report prior to submission of the planning application in June 2021. However, it is stated that consultation responses from statutory consultees were received via the planning portal and responses to comments are provided within ES Volume 3.

4 Chapter 1: Introduction

4.1 Summary of ES review findings

Paragraph 1.2 confirms that the planning application has been submitted in outline, as opposed to a part detailed and part in outline planning application, as the EIA scoping report had suggested.

4.2 Recommendations

Are any clarifications recommended?

No.

Are any Regulation 25 requests for “further information” recommended?

No.

Are there any further recommendations?

No.

5 Chapter 2: EIA Methodology

5.1 Summary of ES review findings

Introduction

No comments.

Planning application

Paragraph 2.4 refers to this being an outline planning application, with all matters reserved, but then goes onto say that a "level of detail" has been provided in regard to access, appearance, landscaping, layout and scale – with a description against each of these points as below.

"Access' –the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network.

'Appearance' –the aspects of a building or place within the Development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture.

'Landscaping' –the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes: (a) screening by fences, walls or other means; (b) the planting of trees, hedges, shrubs or grass; (c) the formation of banks, terraces or other earthworks; (d) the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and (e) the provision of other amenity features;

Layout' –the way in which buildings, routes and open spaces within the Development are provided, situated and orientated in relation to each other and to buildings and spaces outside the Development.

'Scale' –the height, width and length of each building proposed within the Development in relation to its surroundings."

The above bullet points, in places, refer to a level of detailed that is not fixed at this stage. This is however acknowledged through the inclusion of Paragraph 2.5, which correctly refers to the level of detail provided:

"All Development Plots – at this stage, design details relating to Means of Access, Scale of Development, Layout of the Development, Appearance and Landscaping are reserved for subsequent approval; an outline design in the form of a set of Parameter Plans, a Design Code and Design Specification Framework are provided for approval."

Key planning application documents

No comments.

EIA guidance and policy

No comments.

EIA scoping and consultation

Consultation

No comments.

EIA Scoping

The ES States that "a Scoping Opinion was not obtained from LBC at the time of submission of the planning application in June 2021". However, a draft of the EIA scoping opinion was made available to the applicant ahead of the ES being submitted. There is no recognition that a draft of the EIA scoping opinion was received and reviewed by the applicant ahead of submission of the planning application. The applicant subsequently reviewed and responded to the EIA scoping opinion issued on the 24th of June 2021 clarifying how the ES addresses the EIA scoping opinion (this response is available on the LBC planning portal).

EIA Methodology

No comments.

Structure of technical assessments

No comments.

Key assumptions and limitations

No comments.

5.2 Recommendations

Are any clarifications recommended?

- Further discussion with the applicant is required in regard to compliance with the EIA Scoping Opinion – see Chapter 22 of this report – as this may pose a potential point of challenge. Buro Happold's views on the risks are provided in Chapter 22.

Are any Regulation 25 requests for "further information" recommended?

- Subject to the outcome of the EIA Scoping Opinion compliance discussion.

Are there any further recommendations?

- No.

6 Chapter 3: Alternatives and Design Evolution

6.1 Summary of ES review findings

Introduction

This section correctly states that the ES should provide:

"a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects".

Site and surround context

No comments.

Alternative analysis

No comments.

Design brief

No comments.

Key design considerations and framework principles

No comments.

Pre-application consultation

Paragraph 3.57 states:

"a Scoping Opinion has not been received from the LBC at the time of the submission of the planning application in June 2021".

However, a draft of the EIA scoping opinion was made available to the applicant ahead of the ES being submitted. There is a lack of recognition that a draft of the EIA scoping opinion was received and reviewed by the applicant ahead of submission of the planning application. The applicant has since reviewed and responded to the EIA scoping opinion issued on the 24th of June 2021 clarifying how the ES addresses the EIA scoping opinion (this response is available on the LBC planning portal).

Alternative designs

No comments.

Design evolution

This section runs through six iterations of the masterplan design "*studied by the developer*". There is a section accompanying each iteration that discusses key environmental considerations. This commentary refers to

improvements made in regard to different environmental topics, however there is no measurable *"comparison of the environmental effects"* (in terms of commentary on effect significance) beyond stating that improvements were made.

Environmental considerations and design influence

No comments.

Summary

No comments.

6.2 Recommendations

Are any clarifications recommended?

- No.

Are any Regulation 25 requests for "further information" recommended?

- A comparison of the environmental effects of the alternatives considered by the applicant is required to satisfy the EIA Regulations (2017) (as amended).

Are there any further recommendations?

- No.

7 Chapter 4: The Proposed Development

7.1 Summary of ES review findings

Introduction

No comments.

The planning application

No comments.

Description of the proposed development

Table 4.4 gives a very specific breakdown / percentage of tenure for the residential components (as opposed to percentage ranges for each unit type). This leaves little room for movement unless this breakdown is amended post-submission. It is assumed that this is intentional. Should this breakdown be altered in the future, in such a way that it could affect the conclusions made in this assessment, then this should be reviewed from an EIA perspective.

Key design and masterplan principles

No comments.

Public realm, landscaping and play space

There are a number of commitments made regarding habitat creation including approximate areas included in paragraphs 4.66 to 4.73 and spatial plans included in Figure 4.5 and Figure 4.6. It is assumed that these figures and plans are to be considered indicative at this outline planning stage, although it does currently read as a commitment. Should significant changes to these areas in the future occur these should be reviewed from an EIA (wind microclimate etc) and standalone report (ecology/biodiversity net gain, surface water drainage, ground contamination etc) perspective.

Figure 4.7 and Table 4.7 provide commitments in regard to play space provision. It is assumed this should be considered indicative at this outline planning stage, although it does currently read as a commitment. The ES (particularly socio-economics assessment) and other planning documents should be reviewed if these commitments change significantly in the future.

Access, parking and servicing

There does not appear to be confirmation on the minimum or maximum number of car parking or cycle parking spaces to be provided. The applicant should confirm the number of existing spaces, plus the likely range for provision of new spaces considering the flexibility in the area schedule.

Paragraph 4.119 draws reference to the need for further wind tunnel testing at the reserved matters stage, with mitigation included as needed, for each phase. This is to ensure that wind microclimate effects are mitigated to non-significant levels. Reference is made to wind effects being mitigated to negligible levels, rather than simply insignificant levels (which would include minor adverse effects).

Annex A

Parameter Plan 03: Demolition Plan – this focuses on a number of buildings and structures. No boundary walls appear to be proposed for demolition.

7.2 Recommendations

Are any clarifications recommended?

- There does not appear to be confirmation on the minimum or maximum number of car parking or cycle parking spaces to be provided. Can the applicant please confirm the number of existing spaces, plus the likely range for provision of new spaces considering the flexibility in the area schedule?
- There is a commitment at Paragraph 4.119 for wind tunnel testing at the reserved matters stage and it is predicted that effects will be mitigated to negligible levels (as opposed to insignificant levels, which could include minor adverse). Can the Applicant please confirm these commitments are intentional?
- Please confirm that no further structures, including boundary walls, will be removed beyond those included in Parameter Plan 03

Are any Regulation 25 requests for "further information" recommended?

- No (depending on clarifications above).

Are there any further recommendations?

- Table 4.4 gives a very specific breakdown / percentage of tenure for the residential components (as opposed to percentage ranges for each unit type). This leaves little room for movement unless this breakdown is amended post submission. Should this breakdown be altered significantly in the future, this should be reviewed from an EIA perspective.
- There are various commitments made regarding habitat creation including approximate areas included paragraphs 4.66 to 4.73. It is recommended that such measures should be secured and reviewed further in the way of a planning condition, given that the detailed design of the landscaping is not yet fixed.
- Figure 4.7 and Table 4.7 provide commitments in regard to play space provision. It is assumed that this should be considered indicative at this outline planning stage, although it does currently read as a commitment. The ES (particularly socio-economics assessment) and other planning documents should be reviewed if these commitments change significantly in the future.
- A biodiversity net gain score is included at paragraph 4.75 and 4.76. Further assessment and updates to these scores could be secured in the way of a planning condition, given that the detailed design of the landscaping is not yet fixed.

8 Chapter 5: Demolition and Construction

8.1 Summary of ES review findings

Introduction

No comments.

Description of works

It is acknowledged that the phasing presented in the ES is sufficient for assessment purposes at this stage. However, there is reference to the possibility of amended future phasing at paragraph 5.17. This paragraph also alludes to the effects predicted accommodating any future changes (excluding if the phasing boundaries were to change). However, it should be noted that if the relative time periods of individual phases or the ordering of the individual phases were to change significantly, an updated review of the intermediate year effects should be undertaken. This will ensure that impacts and effects to earlier occupants of the development whilst later phases are still under construction are adequately assessed and mitigated.

Materials and resource use

No comments.

Traffic management

No comments.

Plant and equipment

No comments.

Hour of work

No comments.

Environmental mitigation and management controls

The measures included in Chapter 16: Environmental Management, Mitigation and Monitoring should be secured and implemented as part of a planning condition for a CEMP(s).

8.2 Recommendations

Are any clarifications recommended?

No.

Are any Regulation 25 requests for "further information" recommended?

No.

Are there any further recommendations?

Should significant amendments be made to the demolition and construction phasing in the future then this should be reviewed from an EIA perspective. This should include a review of the demolition, construction, intermediate year/time slice and operational effects (if the opening year materially changes).

The following should be secured by LBC ahead of demolition and/or construction:

- Demolition Method Statement.
- Construction Method Statement.
- Detailed Construction Environmental Management Plan (building on the framework plan submitted with the planning application) – including inclusion of mitigation commitments included in the ES.
- Detailed Construction Logistics Plan (building on the framework plan submitted with the planning application) – including inclusion of mitigation commitments included in the ES.

9 Chapter 6: Socio-Economics and Health

9.1 Summary of ES review findings

The consultation section does not fully acknowledge the EIA scoping process undertaken with LBC. Whilst the ES may have been submitted ahead of the formal EIA scoping opinion being received, consultation was undertaken that is relevant and not mentioned. This included:

- The pre-scoping submission discussion between Trium, DP9, LBC and Buro Happold
- The draft of the EIA scoping opinion being issued ahead of the application being submitted.

There is a contradiction in the consultation section, where reference is made to the "scoping opinion" and that it generally confirmed the acceptability of the assessment methodology. There is mention of requests made by LBC's Economic Development Officer but no reference to the requests made by the LBC planning department (which were included in the draft of the EIA scoping opinion); this is a recurring theme made throughout the technical chapters.

Assessment methodology

Paragraph 6.36, which states that the majority of resident spending will be in the Borough, may be contradictory with paragraph 6.35 which states that 43% of retail spending will be in the Borough. It may be that this is including non-retail spending in addition. Regardless, the Borough with the largest proportion of retail spending will be LBC.

LBC to note that paragraph 6.48 and 6.220 clarifies that play space provision is being assessed against the LBC Planning Guidance on Public Open Space target of 6.5 sqm per child and not the London Plan (2021) target of 10 sqm per child.

There are very limited criteria for the assessment specified in Table 6.9. As this currently reads, this leaves the assessment primarily to professional judgement.

At paragraph 6.65, there is no definition of short or medium term. The only chapter in the ES that appears to define the likely duration of short and medium term is Chapter 7 traffic and transportation. Clarification is required on whether there is a standard definition on timescale durations for all chapters.

Baseline conditions

No comments.

Potential effects

Demolition and construction

No comments.

Completed development

It is noted at paragraph 6.220 that there is a target to meet 6.5 sqm per child as per local policy as a minimum. As this is the minimum target being committed to, it should be clarified whether the predicted

moderate beneficial effect at the local area level in 2030 with regard to play space provision accounts for / is based on the minimum commitment. It is not clear if this is accounting for the minimum (worst case) commitment of 6.5 sqm or the indicative contribution included in Table 6.44 (which assumes delivery of more than the minimum). If the effect could be different (and not significantly beneficial) for the committed minimum playspace provision then in theory that should be reported in the ES (a range could be given if desired, but a significant beneficial effect should not be reported in isolation if at the lower end of the scale an insignificant effect could occur). This requires further clarification.

Mitigation and monitoring measures

These measures are being committed to and therefore they should be delivered by the developer and appropriately secured by LBC (s106/condition etc).

Residual effects

As per the comment on local provision of open space above, the significant effect in 2030 for the completed development needs to be clarified i.e., whether this reflects the minimum commitment of 6.5sqm of open space per child.

Climate change

No comments.

Assessment of future environment

Evolution of the baseline condition

No comments.

Cumulative effects assessment

Paragraph 6.242 states that a number of effects are scoped out of the cumulative assessment as the previous assessment undertaken was inherently cumulative through the consideration of a future baseline. Our understanding is that the proposed development assessment has assessed the impacts and effects of the development brought forward in the context of a future baseline. However, there is the possibility that the combined impacts and effects may not have been assessed / reported, on the current baseline, and clarification is required on this point. For example, what is the combined effects of all planned development in regard to construction employment etc (and the other effects listed at paragraph 6.242). It might be appropriate for this to be reported against the current baseline, alongside the planned improvements in social infrastructure when determining the effects significance of the combined effects.

Table 6.46 refers to a number of the cumulative development sites falling outside of the relevant study area. The socio-economics assessment however assesses a number of effects at the local, district and regional levels. Given that these sites are located within LBC, clarification is required on why these sites are being scoped out of the cumulative assessment / further explanation is required (presumably this is specific to the study area for open space, play space and crime and community safety).

Paragraphs 6.246 and 6.247 highlight a moderate beneficial effect with regard to cumulative open space provision. However, the assessment confirms that this effect is not significant. However, this contradicts the methodology, notably paragraph 6.69 that states "*Effects that are classified as moderate or major in scale –*

whether beneficial or adverse, and during demolition and construction or the operational phase of the Proposed Development – are considered significant effects". This also contradicts paragraph 6.2.60 where this effect is highlighted as significant. Clarification is therefore required on whether this cumulative effect is considered significant or not.

Paragraph 6.248 refers to a moderate beneficial effect with regard to play space provision. This is the same significance of the scheme in isolation. As per the previous comment above, clarification is required on this, and whether it is robust to consider the effects as significant beneficial if the London Plan target is not being met.

Future sensitive receptors assessment

No comments.

Likely significant effects

Socio-economics

No comments beyond those made above.

Health

No comments.

9.2 Recommendations

Are any clarifications recommended?

- At paragraph 6.65, there is no definition of short or medium term. The only chapter in the ES that appears to define the likely duration of short and medium term is Chapter 7 traffic and transportation. Clarification is required on whether there is a standard definition on timescales durations for all chapters.
- Paragraph 6.242 states that a number of effects are scoped out of the cumulative assessment as the previous assessment undertaken was inherently cumulative through the consideration of a future baseline. Our understanding is that the proposed development assessment has assessed the impacts and effects of the development brought forward in the context of a future baseline. However, there is the possibility that the combined impacts and effects may not have been assessed / reported on the current baseline. For example, what are the likely combined effects of all planned development in regard to construction employment etc (and the other effects listed at paragraph 6.242). It might be appropriate for this to be reported against the current baseline, alongside the planned improvements in social infrastructure when determining the effects significance of the combined effects.
- Table 6.46 refers to a number of the cumulative development sites falling outside of the relevant study area. The socio-economics assessment however assesses a number of effects at the local, district and regional levels. Given that these sites are located within LBC, clarification is required on why these sites have been scoped out of the cumulative assessment.

Are any Regulation 25 requests for "further information" recommended?

- TBC – dependent on responses to clarifications above.

Are there any further recommendations?

- The committed mitigation in this assessment should be secured, by appropriate means, by LBC.

10 Chapter 7: Traffic and Transport

10.1 Summary of ES review findings

The consultation section does not fully acknowledge the EIA scoping process undertaken with LBC. Whilst the ES may have been submitted ahead of the formal EIA scoping opinion being received, there was consultation undertaken that is relevant and not mentioned. This included:

- The pre-scoping submission discussion between Trium, DP9, LBC and Buro Happold
- The draft of the EIA scoping opinion being issued ahead of the application being submitted.

Assessment methodology

Paragraph 7.8 confirms that survey data was collected between Monday the 15th of July and Sunday the 21st of July 2019. It is assumed that this was just ahead of the summer school holidays commencing and therefore the data is representative.

Paragraph 7.25 states:

“trip generation forecast in the TA is based on floor areas and uses derived from the Illustrative Masterplan, as detailed within the Design and Access Statement, and provides a robust basis upon which to assess the outline scheme in terms of the transport effects of the proposals”.

However, this only represents one eventuality and may not represent the maximum possible generation of additional trips for all transport modes. Clarification is required on whether the assessment has accounted for the maximum number of trips that could be realised, for each travel mode, based on the flexibility included within the area schedule for the proposed development.

Baseline conditions

No comments.

Potential effects

Demolition and construction

No comments.

Completed development

No comments.

Mitigation and monitoring measures

No comments.

Residual effects

No comments.

Likely significant effects

No comments.

Climate change

No comments.

Assessment of future environmentEvolution of the baseline condition

No comments.

Cumulative effects assessment

The cumulative effects should be classified so that they can be compared against the effects of the proposed development in isolation i.e., direct or indirect or; permanent or temporary; and short term, medium term or long term.

10.2 Recommendations**Are any clarifications recommended?**

- Paragraph 7.25 states that the *"trip generation forecast in the TA is based on floor areas and uses derived from the Illustrative Masterplan, as detailed within the Design and Access Statement, and provides a robust basis upon which to assess the outline scheme in terms of the transport effects of the proposals"*. However, this only represents one eventuality and may not represent the maximum possible generation of additional trips for all transport modes. Clarification is required on whether the assessment has accounted for the maximum number of trips that could be realised, for each travel mode, based on the flexibility included within the area schedule for the proposed development.

Are any Regulation 25 requests for "further information" recommended?

- Trip generation rates - dependent on response to clarification above.
- The cumulative effects should be classified so that they can be compared against the effects of the proposed development in isolation i.e., direct or indirect or; permanent or temporary; and short term, medium term or long term.

Are there any further recommendations?

- Demolition Method Statement, Construction Method Statement, Detailed Construction Environmental Management Plan and Detailed Construction Logistics Plan to be secured by planning obligation as recommended in Chapter 9 of this ES review report.

11 Chapter 8: Air Quality

11.1 Summary of ES review findings

The consultation section does not fully acknowledge the EIA scoping process undertaken with LBC. Whilst the ES may have been submitted ahead of the formal EIA scoping opinion being received, there was consultation undertaken that is relevant and not mentioned. This included:

- The pre-scoping submission discussion between Trium, DP9, LBC and Buro Happold
- The draft of the EIA scoping opinion being issued ahead of the application being submitted.

Assessment methodology

No comments.

Baseline conditions

No comments.

Potential effects

Demolition and construction

There are some minor differences between the modelled massing in Figure 8.5 and what the parameter plans in Chapter 4 Proposed Development appear to show. These minor differences are assumed to be immaterial to the assessment undertaken.

Completed development

There is no discussion regarding the proposed development including industrial and light industrial use classes. It is assumed that there are no potential effects from use classes B2, B8 or E(g)(iii) that need to be considered.

Mitigation and monitoring measures

No comments.

Residual effects

Table 8.14 does not provide a summary of the effects relating to construction traffic modelling (previously concluded to be not significant) nor to occupants of the earlier phases (this appears to have been concluded to be not significant at paragraph 8.87 alongside existing receptors). For completeness, these effects could have been summarised (however, this in itself does not represent a need for the ES to be updated).

Air quality positive statement

No comments.

Air quality neutral assessment

The number of dwellings shown in Table 8.15 is 750 not the maximum of 825, which presumably could lead to an under estimation of residential vehicular trips. The reason for using 750 homes and whether this is material to the assessment undertaken should be clarified.

It is not clear whether the total trip rate benchmark figure referenced in paragraph 8.111 is the existing traffic flow from the site.

Site suitability

No comments.

Climate change

Paragraph 8.115 alludes to energy plant emissions associated with the proposed development; however, it was previously discussed that no combustion plant is proposed on site.

Assessment of future environment

Evolution of the baseline condition

No comments.

Cumulative effects assessment

No comments.

11.2 Recommendations

Are any clarifications recommended?

- There are some minor differences between the modelled massing in Figure 8.5 and what the parameter plans in Chapter 4 Proposed Development appear to show. Presumably these minor differences are immaterial to the assessment undertaken?
- There is no discussion regarding the proposed development including industrial and light industrial use classes. Presumably there are no potential effects from use classes B2, B8 or E(g)(iii) that need to be considered?
- The number of dwellings shown in Table 8.15 is 750 not the maximum of 825, which presumably could lead to an under estimation of residential vehicular trips. Please confirm the reason for using 750 homes and whether this is material to the assessment undertaken?
- The total trip rate benchmark figure referenced in paragraph 8.111, is this the existing traffic flow from the site?

- Paragraph 8.115 alludes to energy plant emissions associated with the proposed development; however, it was previously discussed that no combustion plant is proposed on site. Please confirm whether combustion plant in any form is being proposed?

Are any Regulation 25 requests for “further information” recommended?

- None currently – dependent on response to clarification above.

Are there any further recommendations?

- The committed mitigation in this assessment should be secured, by appropriate means, by LBC.

12 Chapter 9: Noise and Vibration

12.1 Summary of ES review findings

The consultation section does not fully acknowledge the EIA scoping process undertaken with LBC. Whilst the ES may have been submitted ahead of the formal EIA scoping opinion being received, there was consultation undertaken that is relevant and not mentioned. This included:

- The pre-scoping submission discussion between Trium, DP9, LBC and Buro Happold
- The draft of the EIA scoping opinion being issued ahead of the application being submitted.

Assessment methodology

There appears to be a contradiction within the ES between paragraph 9.17 and paragraph 7.17. This should be clarified. The two statements are as follows:

Traffic and Transport:

- *DfT data shows that traffic volumes across Camden have declined significantly during the period 1993 to 2019. The expansion of London's Ultra Low Emissions Zone (ULEZ) in October 2020 can be expected to further reduce traffic volumes. On this basis, it was agreed with LBC and TfL that the assessment will adopt 2019 traffic levels for the 2030 Future Baseline year to provide a robust assessment. In reality, it is likely that traffic volumes will decline between now and 2030.*

Noise and vibration:

- *A potential uplift in the traffic road volumes expected in the area (further context, see ES Volume 1, Chapter 7: Traffic and Transport). The anticipated changes in road traffic flows are considered to be the only potential significant source of changes in the future baseline noise levels at and around the site;*

The assumptions included at paragraph 9.48 should be included in the committed mitigation / framework CEMP. Some of these measures do not appear to be included in Chapter 16.

Baseline conditions

There is no key associated with the units included in Table 9.22, but it is assumed that this is in dB/dB(A).

Potential effects

Demolition and construction

It appears that the demolition and noise construction modelling has utilised the illustrative masterplan (i.e., the illustrative masterplan appears to be shown in Figures 9.5 to 9.9) as opposed to the maximum plot parameter plan. It is assumed that the effects account for the maximum extent of the plot footprints, i.e., where a building could be located for the introduced receptors but this should be confirmed. There is reference made to buildings in various places in this assessment, when it may be more accurate at this stage to refer to development plots (where future building are to be located).

Construction traffic noise effects have been considered for existing receptors, but appear not to be considered for occupants of the earlier phases whilst the later phases are under construction. This presumably is because this assessment accounts for changes to baseline traffic noise, but further clarity is required. Paragraph 9.131 suggests that all other receptors (beyond those assessed) have been assessed as negligible and not significant. Confirmation that this is the case for occupants of the earlier phases should be sought.

Completed development

There appears to be no assessment of the introduced receptors as part of the proposed development itself in this section. This instead is located in the "Site suitability section" at paragraph 9.174.

Mitigation and monitoring measures

These measures are being committed to and therefore they should be delivered by the developer and appropriately secured by LBC (i.e., in the way of a planning condition/obligation etc).

Residual effects

The operational effects present in Table 9.28 "state all receptors" and that traffic and building services noise will be negligible. However, clarification is required on whether this also accounts for the introduced receptors, given that this appears to be covered later in the ES Chapter and not in this section.

Site suitability

This section could have formed an Appendix to the ES chapter and the effects summarised in EIA terms in the earlier sections of the ES Chapter. Further information is required for the following reasons:

- This section comments on site suitability but does not present a summary of the effects to introduced receptors in EIA terms (i.e., negligible, minor, moderate and major).
- There is no clear specification of the required mitigation to be secured.
- This section lacks commentary on the assumptions made in regard to modelling the illustrative scheme and how these assumptions should be addressed at the reserved matters stage (i.e., updated modelling / verification required?).

It is recommended that the effects to future occupants of the development itself should be explicitly addressed and commentary be provided on whether significant effects could occur or not and what mitigation is required. It is recommended that this is set out in a similar way to the wider assessment and using terminology that is consistent with the wider ES (i.e., significant or not significant; negligible, minor, moderate, major; and short term, medium term and long term etc).

Climate change

No comments.

Assessment of future environment

Evolution of the baseline condition

No comments.

Cumulative effects assessment

Paragraph 9.244 specifies a major effect but not that it is adverse, which it presumably would be.

The cumulative effects should be classified so that they can be compared against the effects of the proposed development in isolation i.e., direct or indirect; permanent or temporary; and short term, medium term or long term.

12.2 Recommendations

Are any clarifications recommended?

- There appears to be an inconsistency within the ES between paragraph 9.17 which appears to contradict the transport ES Chapter at paragraph 7.17. Specifically, whether traffic volumes will decline or uplift (see earlier comment). This should be clarified.
- There is no key associated with the units included in Table 9.22, but it is assumed that this is in dB/dB(A). This should be confirmed.
- It appears that the demolition and noise construction modelling has utilised the illustrative masterplan (i.e., the illustrative masterplan appears to be shown in Figures 9.5 to 9.9) as opposed to the maximum plot parameter plan. It is assumed that the effects account for the maximum extent of the plot footprints, i.e., where a building could be located for the introduced receptors in the future but this should be confirmed.
- Construction traffic noise effects have been considered for existing receptors, but appear not to be considered for occupants of the earlier phases whilst the later phases are under construction. This presumably is because this assessment accounts for changes to baseline traffic noise, but further clarity is required. Paragraph 9.131 suggests that all other receptors (beyond those assessed) have been assessed as negligible and not significant. Confirmation that this is the case for occupants of the earlier phases should be sought.
- The operational effects present in Table 9.28 "state all receptors" and that traffic and building services noise will be negligible. However, clarification is required on whether this also accounts for the introduced receptors – given that this appears to be covered later in the ES Chapter and not in this section.

Are any Regulation 25 requests for "further information" recommended?

- Yes in regard to the introduced receptors during operation. It is recommended that the effects to future occupants of the development itself should be explicitly addressed and commentary be provided on whether significant effects could occur or not and what mitigation is required. It is recommended that this is set out in a similar way to the wider assessment and using terminology that is consistent with the

wider ES (i.e., significant or not significant; negligible, minor, moderate, major adverse; and short term, medium term and long term etc).

- The cumulative effects should be classified so that they can be compared against the effects of the proposed development in isolation i.e., direct or indirect; permanent or temporary; and short term, medium term or long term.
- Potential further requests subject to the clarification raised above.

Are there any further recommendations?

- The committed mitigation in this assessment should be secured, by appropriate means, by LBC.

13 Chapter 10: Daylight, Sunlight, Overshadowing and Solar Glare

13.1 Summary of ES review findings

The consultation section does not fully acknowledge the EIA scoping process undertaken with LBC. Whilst the ES may have been submitted ahead of the formal EIA scoping opinion being received, there was consultation undertaken that is relevant and not mentioned. This included:

- The pre-scoping submission discussion between Trium, DP9, LBC and Buro Happold
- The draft of the EIA scoping opinion being issued ahead of the application being submitted.

Assessment methodology

The City of London Corporation have made the following comments:

The site for the Lido was selected, on the southern slope of Parliament Hill to maximise the direct sunlight received by both the swimming pool and the sunbathing terraces and café space. This is an intrinsic part of the buildings design and function.

It is noted that the application submission has considered the potential for overshadowing in accordance with the BRE prescribed methodology. Page 17 of the Appendix: Daylight, Sunlight, Overshadowing and Solar Glare Annex 3-6 in the Environmental Statement Vol 3 Technical Appendices indicates that there is overshadowing of the Lido at 9am on 21 December. The Lido is open 365 days of the year from 7am and the prospect of the swimming area and terraces being in shadow from opening until after 9am is a significant cause for concern. Notwithstanding the BRE guidance, the City Corporation would request assurances that the scale of development proposed would not overshadow the Swimming Pool or Sun terraces of this listed building. Permanent shadow during morning swimming hours would adversely and irrevocably affect the character of this listed building and potentially its viability. The enjoyment of the facilities provided is largely contingent upon the direct sunlight received during opening hours throughout the year, particularly for morning swimming.

From the assessment provided, it is a concern to the City Corporation that the scale of development proposed may adversely affect both the character and setting of this listed building.

The submitted Built Heritage Statement currently only considered the visual impact of the proposed scheme on the setting of the Lido. The concerns set out above are however considered material to an assessment of the setting of this listed building.

It would therefore be beneficial if the Council could request that the Applicant undertakes a suitable assessment of any potential overshadowing impact from the Proposed Development prior to determination of the application.

The City Corporation would wish to be consulted on the scoping of such an assessment given the use of the Lido throughout the year.

Furthermore, a local resident has raised whether the impact of shading on the local lido has been considered and whether “the towers would block the early morning sun in particular”.

It is noted that the Lido has been considered as part of Amenity Space Receptor 5 (Parliament Hill Fields). It is recommended that the consultant confirms that the Lido itself, if assessed in isolation, would be assessed as being subject to a negligible effect – as is the case when combined with the wider Parliament Hill Fields receptor. The nature of any overshadowing effects to the Lido should be clarified.

Baseline conditions

No comments.

Potential effects

Demolition and construction

No comments.

Completed development

It is noted that an overall effect significance is given for each receptor. However, there are potentially some windows and properties that experience effects more pronounced than the overall effect significance rating. There does however appear to be justification provided for the overall significance rating given.

Mitigation and monitoring measures

These measures are being committed to and therefore they should be delivered by the developer and appropriately secured by LBC (i.e., in the way of a planning condition etc).

Residual effects

No comments.

Review of the illustrative masterplan

No comments.

Climate change

No comments.

13.2 Recommendations

Are any clarifications recommended?

- An objection has been raised by Trustees of Mortimer Terrace Nature Reserve, due to overshadowing effects on existing ecological species associated with the reserve. Given that ecology has been scoped out of the ES, can the project ecologist please confirm that this will not lead to a significant ecological effect?

- It is noted that the Lido has been considered as part of Amenity Space Receptor 5 (Parliament Hill Fields). It is recommended that the consultant confirms that the Lido itself, if assessed in isolation, would be assessed as being subject to a negligible effect – as is the case when combined with the wider Parliament Hill Fields receptor. The nature of any overshadowing effects to the Lido should be clarified.
- BRE are separately reviewing this ES Chapter and any recommendations or requests associated with this review will also need to be considered by the applicant.

Are any Regulation 25 requests for “further information” recommended?

- Potentially subject to clarifications raised on the effects to the Lido.

Are there any further recommendations?

- No

14 Chapter 11: Wind Microclimate

14.1 Summary of ES review findings

The consultation section does not fully acknowledge the EIA scoping process undertaken with LBC. Whilst the ES may have been submitted ahead of the formal EIA scoping opinion being received, there was consultation undertaken that is relevant and not mentioned. This included:

- The pre-scoping submission discussion between Trium, DP9, LBC and Buro Happold
- The draft of the EIA scoping opinion being issued ahead of the application being submitted.

Assessment methodology

The methodology proposed via wind tunnel assessment is considered to be appropriate. The methodology follows the assessment of the wind microclimate conditions via the Lawson Criteria. Sensitive receptors have been identified for the baseline and proposed development.

It should be noted that the wind tunnel assessment modelled an earlier iteration of the scheme, with Phase 1 in detail as opposed to the maximum parameters. However, the scheme in outline has been assessed using computational fluid dynamics. Given that the proposed development was submitted entirely in outline, the assessment results can only be considered to be indicative at this stage.

The configurations bulleted below paragraph 11.24 could be slightly misleading, as they state: "hybrid proposals". The reality is that a detailed proposal for Phase 1 has been modelled, however the applicant is not currently applying for consent for this and therefore the proposals could change.

Baseline conditions

No comments.

Potential effects

Demolition and construction

No comments.

Completed development

There is a deviation from the requested scenarios put forward in the EIA Scoping Opinion. However, given that Phase 1 was not submitted in detail, the assessment approach and the scenarios included in the wind assessment is robust. There may however be a potential point of legal challenge here and commentary is made on this further in Chapter 23 of this report.

Mitigation and monitoring measures

Further wind testing is specified as being required at the reserved matters stage, when the final building form is set, alongside committed landscaping. This should be secured by LBC via planning condition.

Residual effects

Residual effects are assessed as being negligible. However, further testing will be required at the reserved matters stage to demonstrate that this commitment has been achieved.

Climate change

No comments.

Assessment of future environmentEvolution of the baseline condition

No comments.

Cumulative effects assessment

The cumulative effects predicted will need to be verified and re-assessed as part of the wind assessment undertaken at the reserved matters stages(s).

The cumulative effects should be classified so that they can be compared against the effects of the proposed development in isolation i.e., direct or indirect; permanent or temporary; and short term, medium term or long term. However, given that effects are predicted to be negligible in this case this is not considered essential.

Future sensitive receptors

No comments.

14.2 Recommendations**Are any clarifications recommended?**

- Discussion on compliance with EIA Scoping Opinion required – see Chapter 23 of this report.

Are any Regulation 25 requests for “further information” recommended?

- The cumulative effects should be classified so that they can be compared against the effects of the proposed development in isolation i.e., direct or indirect; permanent or temporary; and short term, medium term or long term.

Are there any further recommendations?

- The committed mitigation in this assessment should be secured, by appropriate means, by LBC.

15 Chapter 12: Greenhouse Gas Emissions

15.1 Summary of ES review findings

The consultation section does not fully acknowledge the EIA scoping process undertaken with LBC. Whilst the ES may have been submitted ahead of the formal EIA scoping opinion being received, there was consultation undertaken that is relevant and not mentioned. This included:

- The pre-scoping submission discussion between Trium, DP9, LBC and Buro Happold
- The draft of the EIA scoping opinion being issued ahead of the application being submitted.

Assessment methodology

The assessment methodology is deemed to be appropriate overall. However, the following points should be noted:

- Paragraph 12.5: Although it would be good practice to estimate greenhouse gas emissions associated with the site in its current form (e.g., energy consumption from EPCs and estimates on transport emissions), it is acknowledged that the approach taken is a worst case.
- Paragraph 12.7: It is not stated why for 'building repair, maintenance and refurbishment' only lifecycle modules B2-B5 have been considered, and not lifecycle module B1.
- Paragraph 12.8: It is not stated why lifecycle module D of BS EN 15978 has not been included in the assessment.
- Paragraph 12.13: Although this section is titled 'demolition and construction', it appears that GHG emissions associated with the demolition of current buildings on the site has not been considered.
- Paragraph 12.22: Within the RICS guidance referenced, it states that construction embedded carbon makes up 51% and embedded carbon in-use makes up 18% for residential. From this, it is correct that in-use embedded GHG emissions are around 26% of the total embedded GHG emissions, as stated. However, this does not mean that construction embedded GHG emissions should be uplifted by 26% to get the in-use embedded GHG emissions. In-use embedded carbon is 35% of construction embedded GHG emissions (i.e., 18 / 51). Therefore, the correct calculation would be to multiply the total construction embedded GHG emissions by 1.35 to get the total embedded GHG emissions. The calculation should then subtract the construction-embedded GHG emissions from the total in order to get a value for the in-use embedded GHG emissions.
- Paragraph 12.25: It should be noted that the majority of dwellings included in the BEIS NEED Carbon Average data for electricity consumption are likely to use gas for heating. Therefore, considering this development is using electricity for heating, the electricity consumption is likely to be significantly higher than the average for Camden. This is also the case for CIBSE Guide F, where electricity consumption values are based on the presence of gas heating.
- Paragraph 12.29: As outlined in the 'communication/reporting' section of the IEMA EIA Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance (2017), it is good practice to report on both GHG emissions during the first year of operation and for the full lifetime of the proposed

development. This assessment reports on GHG emissions during the opening year only and not on the full lifecycle.

- Paragraph 12.46: As climate change is a global issue, with the receptor being the global atmosphere, it would be more appropriate for the geographic extent to be 'international', rather than 'national'.

Baseline conditions

As stated in the assessment methodology section above, although it would be good practice to estimate greenhouse gas emissions associated with the site in its current form (e.g., energy consumption from EPCs and estimates on transport emissions), it is acknowledged that approach taken is a worst case (i.e., assuming that current emissions are zero).

Potential effects

Demolition and construction

GHG emissions associated with demolition of the current buildings on the site has not been considered (as outlined in the assessment methodology section above). The estimation of GHG emissions associated with construction are deemed to be appropriate on the whole. Please refer to the following two comments:

- Paragraph 12.52: It is agreed that GHG emissions associated with land use change can be scoped out of the assessment due to the current and proposed land uses. However, it would be more appropriate to state this within paragraph 12.8 of the methodology.
- Paragraph 12.55 and paragraph 12.57: It is not clear whether the construction and operation vehicle movements account for both arrivals and departures from the site, or just arrivals.

Completed development

The estimation of GHG emissions associated with operation are deemed to be appropriate on the whole. Please refer to the following comments:

- Paragraph 12.59: As stated in the methodology section above, the calculation of in-use embedded GHG emissions is incorrect. Estimated in-use embedded GHG emissions stated (36,637 tonnes) are only 20.6% of the total lifetime embedded GHG emissions (i.e., $36,637 + 141,051 = 177,724$. $36,637 / 177,724 = 0.206$). The correct calculation should be $141,051 * 1.353$ to get the total embedded carbon (190,842 tonnes). The in-use embedded carbon should then be that minus the construction embedded carbon (i.e. $190,842 - 141,051 = 49,791$ tonnes. This means that there has been an underestimation of 13,154 tonnes of in-use embedded GHG emissions.
- Paragraph 12.60: As stated in the methodology section above, these values are likely to be an underestimation based on the benchmarks assuming that heating is supplied by gas.

Completed development

The following comments relate to the comparison of GHG emissions associated with the proposed development to borough and city-wide GHG emissions.

- Paragraph 12.65: GHG emissions associated with construction site emissions (i.e. lifecycle stage A5) are included in the borough-wide emissions inventory. Therefore, these GHG emissions should be included

in the comparison too, alongside operational energy and operational transport. This would mean that the proposed development is responsible for a larger proportion of GHG emissions than is reported.

- Paragraph 12.65: Whilst the justification for removing construction embedded GHG emissions, construction transport and in-use embedded GHG emissions from the borough wide comparison is understandable, there is less justification for doing this when comparing to city-wide GHG emissions. There is a good chance that a sizeable portion of materials will be sourced within Greater London.

Mitigation and monitoring measures

The mitigation measures set out are deemed to be appropriate to reduce GHG emissions associated with the proposed development during construction and operation.

Residual effects

The residual effects stated are deemed to be appropriate. However, the effects should be classified as direct or indirect; permanent or temporary; and short term, medium term or long term etc as per the EIA methodology.

Assessment of future environment

Evolution of the baseline condition

It is stated here that the site is 'cleared, used predominantly as storage space with some temporary buildings'. This appears to contradict paragraph 12.5, which states that 'the site is currently occupied by a number of commercial businesses on the existing trading estate at the site'.

Cumulative effects assessment

The cumulative effects should be classified so that they can be compared against the effects of the proposed development in isolation i.e. direct or indirect; permanent or temporary; and short term, medium term or long term.

Climate change

The climate change section of the ES chapter is deemed to be appropriate.

Likely significant effects

The likely significant effects section of the ES chapter is deemed to be appropriate.

15.2 Recommendations

Are any clarifications recommended?

- Clarification on whether vehicle trips associated with the construction and operation phase account for both arrivals and departures, or whether it is arrivals only.

Are any Regulation 25 requests for "further information" recommended?

To be discussed further. It is acknowledged that the mitigation and residual effects will unlikely change, however the following updates could be made for completeness so that the environmental information provided is as accurate as possible in reflecting the likely contributions of the proposed development to global atmospheric greenhouse gas concentrations at this outline planning stage:

- Revision of the in-use embedded GHG emission to correct the underestimation;
- Revision of the operational energy GHG emissions to correct the underestimation; and
- Revision of the comparison to borough and city-wide GHG emissions inventories.
- The residual effects stated are deemed to be appropriate. However, the effects should be classified as direct or indirect; permanent or temporary; and short term, medium term or long term etc as per the EIA methodology.
- The cumulative effects should be classified so that they can be compared against the effects of the proposed development in isolation i.e. direct or indirect; permanent or temporary; and short term, medium term or long term.

Are there any further recommendations?

- The committed mitigation in this assessment should be secured, by appropriate means, by LBC.

16 Chapter 13: Built Heritage

16.1 Summary of ES review findings

The consultation section does not fully acknowledge the EIA scoping process undertaken with LBC. Whilst the ES may have been submitted ahead of the formal EIA scoping opinion being received, there was consultation undertaken that is relevant and not mentioned. This included:

- The pre-scoping submission discussion between Trium, DP9, LBC and Buro Happold
- The draft of the EIA scoping opinion being issued ahead of the application being submitted.

Assessment methodology

No comments.

Baseline conditions

No comments.

Potential effects

Demolition and construction

No comments.

Completed development

No comments.

Mitigation, monitoring and residual effects

These measures are being committed to and therefore they should be delivered by the developer and appropriately secured by LBC (i.e., in the way of a planning condition etc).

Review of illustrative masterplan

No comments.

Climate change

No comments.

Assessment of future environment

Evolution of the baseline condition

No comments.

Cumulative effects assessment

No comments.

Likely significant effects

No comments.

16.2 Recommendations

Are any clarifications recommended?

- No

Are any Regulation 25 requests for "further information" recommended?

- No

Are there any further recommendations?

- The committed mitigation in this assessment should be secured, by appropriate means, by LBC.

17 Chapter 14: Effect Interactions

17.1 Summary of ES review findings

Introduction

No comments.

Demolition and construction

No comments.

Completed development

The assessment of interactive effects during operation appears to be inadequate in reviewing the potential interactions on the same receptor. For example:

- The assessment does not consider the interaction effects of different types of socio-economic effects on the same receptor. For example, the combined impact and effects of employment, housing open space, play space, crime etc, which are all realised on the local community (the same receptor). The assessment considers that this effect cannot interact. However, as they are being realised by the same receptor (existing and future residents) then this may not be the case. In theory, a significant interactive effect could occur with a number of isolated significant effects occurring to this receptor. In theory, a significant interactive effect could occur with a number of isolated significant effects occurring to this receptor.
- Another example includes transport severance, delay and amenity interacting in impacting pedestrians and cyclists together. These effects could also combine and interact with the solar glare effect to surrounding road users.

The assessment does not adequately consider the possibility of a number of different effects (within the same chapter and within the wider ES) interacting with each other. This is in contrast with the construction assessment, which does appear to acknowledge that effects can interact within the same assessment, for example it includes an interactive assessment of the different transport effects on the same receptor.

17.2 Recommendations

Are any clarifications recommended?

- Justification on operational interactive effects as per the points made above.

Are any Regulation 25 requests for "further information" recommended?

- To be confirmed. Likely, with regard to operational interactive effects as per the points above.

Are there any further recommendations?

- No.

18 Chapter 15: Likely Significant Effects and Conclusions

18.1 Summary of ES review findings

Introduction

Paragraph 15.2 states "it should be noted, that for all topics apart from Wind Microclimate residual effects that are identified as 'moderate' or 'major' in scale are considered to be 'significant' (with effects that are 'negligible' or 'minor' in scale being 'not significant'). However, it appears that the TVIA considers effects in the range of minor to moderate to be insignificant. As these effects are up to moderate, clarification is required on whether they are considered to be significant or not.

Likely significant effects

No comments beyond those made on the technical assessments already.

Likely significant cumulative effects

This section does not confirm whether the cumulative effects predicted are permanent or temporary; and short term, medium term or long term.

18.2 Recommendations

Are any clarifications recommended?

- Paragraph 15.2 states "it should be noted, that for all topics apart from Wind Microclimate residual effects that are identified as 'moderate' or 'major' in scale are considered to be 'significant' (with effects that are 'negligible' or 'minor' in scale being 'not significant'). However, it appears that the TVIA considers effects in the range of minor to moderate to be insignificant. As these effects are up to moderate, clarification is required on whether they are considered to be significant or not.

Are any Regulation 25 requests for "further information" recommended?

- The cumulative effects should be classified so that they can be compared against the effects of the proposed development in isolation i.e., permanent or temporary; and short term, medium term or long term.

Are there any further recommendations?

- No.

19 Chapter 16: Environmental Management, Mitigation and Monitoring Schedule

19.1 Summary of ES review findings

Introduction

No comments.

19.2 Recommendations

Are any clarifications recommended?

- There appears to be some mitigation that has been assumed to be in place that is not specified here. For example, the noise and vibration measures specified at paragraph 9.48 do not appear to be summarised here in full. Why are these measures not specified?

Are any Regulation 25 requests for "further information" recommended?

- Potentially – subject to clarification above.

Are there any further recommendations?

- The mitigation specified here should be secured, by appropriate means, by LBC.

20 Volume II of the ES: Townscape and Visual Impact Assessment

20.1 Summary of ES review findings

Introduction

No comments.

Planning policy and guidance

No comments.

Assessment methodology and effect significance criteria

Table 1 does not highlight minor to moderate effects, as it does moderate and major effects. It is therefore not clear if minor to moderate effects would be considered to be significant in this assessment. Including this range as significant would be consistent with the wider ES i.e., a moderate effect being significant. From reviewing Table 3 (residual effects), it does appear that minor to moderate is not considered significant in ES terms in this assessment. Clarification is required on this point as this contradicts the wider ES methodology (moderate being significant).

Paragraph 3.46 states *"The approach to cumulative assessment is to focus on the additional effects of the Proposed Development on top of the cumulative baseline"*. This would in fact be a scheme impact assessment on top of a future baseline, as opposed to a cumulative effects assessment and therefore the assessment of cumulative effects may be missing. This appears to be the approach taken, as the cumulative effects assessment refers to the impact of the proposed development not the impact of the proposed development in conjunction with cumulative schemes on the existing baseline. There is value in undertaking an assessment of the impacts and effects of the proposed development, on top of the future baseline, as has been done here. However, this does not negate the need for cumulative effects assessment. The cumulative effects assessment, by definition, should focus on the combined effects of the proposed development, alongside the cumulative development schemes, on the existing baseline. Confirmation is required on this point and on the approach taken.

Historic England has highlighted that:

"The TVIA methodology confirms that the images shown in the TVIA have been taken with a 24mm lens. Good practice guidance suggests that this does not most accurately reflect what the human eye sees. We encourage the applicants to produce views in line with the Landscape Institute Technical Guidance Note 06/19 Visual Representation of development proposals, which specifies a 50mm lens"
The consideration from an ES process perspective is whether Peter Stewart Consultancy have been able to accurately predict the significance of the effects using the methodology that they have, which presumably is the case. This is guidance, and there may be a justified reason for using the lens that have in the assessment. However, this should be clarified, and a response should be issued to Historic England to close this out if possible"

Baseline conditions

Whilst not material, the title above Paragraph 4.6 is not legible.

The proposed development

No comments.

Assessment of likely significant effectsDemolition and construction phase

Paragraph 6.7 and 6.8 states that a number of views and character areas will potentially be subject to a "moderate or higher" significant effect. Presumably, this therefore means that the views and character areas highlighted could be subject to a moderate to major adverse effect. This appears to be confirmed i.e., moderate to major in Table 3 which includes the residual effects,

Operational phase

See comments above in regard to cumulative effects assessment.

The following has been raised by a resident on the application:

"I've not worked my way through all of the documents yet but it strikes me that the Townscape and Visual Impact Assessment needs checking. I don't think it follows the Landscape Institute guidance (it says it is "based on the principles of") and comes to some conclusions – that the impact of the development would be beneficial to certain views, including the one it almost entirely blocks from Kentish Town and one from the lower slopes of Parliament Hill – which don't stand up to scrutiny. Presumably this will be picked up in the ES review."

This is similar to a comment raised by Historic England:

"In the view from just east of Parliament Hill, LVMF 2B.1, the scheme would have a major impact on the view, with the scale of development and its relative closeness to Parliament Hill meaning that it would have a prominent, even dominant, position in the view, obscuring much of the gap between the City of London and Westminster and blocking much of central London from view. The impact is to hamper much of the townscape legibility that makes this view so important.

In LVMF view 2A.1, from Parliament Hill summit, this would constitute large scale development in the foreground of the panorama. The development would block views of parts of the City of London, and erode the distinction between the lofty hilltop and large scale development in the distance, with a notable impact on the panoramic view. The gap between the City cluster and Canary Wharf would also be partly blocked. The result would be that key features in the view would become hidden and the legibility of the panorama would be lost.

[.....]

Historic England is concerned that the proposed development would have a significant impact on the views from Parliament Hill, for the reasons explained above [see full response in Annex C]. The scale of development would block large and important parts of the views over central London. It would undermine the legibility of the panorama as a means to understand the urban composition and

character of London, and the context of its key landmarks. This panoramic view over central London is of considerable public importance, experienced by millions and one of the most beloved views of London, with huge public value. These impacts harm would run counter to policies in both the London Plan and the Camden Plan. Historic England encourages you address these concerns, with the aim of negotiating a scheme that avoids significant impacts on these strategic views. At the very least, the impacts on strategic views would need to be weighed in the planning balance in determining the scheme.

The impact on the locally important view from Kentish Town station would also be significantly harmful, blocking most of the views of the hills that are the reason for its protection in Camden's Local Plan."

Clarification should be sought on these aspects as there is disagreement with the methodology and nature of the effects predicted, specifically for views from Parliament Hill and from Kentish Town Station.

The City of London Corporation have made the following comments:

Views.

It is disappointing that the Townscape and Visual Impact Assessment submitted as part of the EIA does not mention the provisions of Policy A2 of the Camden Local Plan when establishing the policy context for assessment. This policy is explicit in stating that development proposals should consider views to and from the Heath.

There are a limited number of viewpoints selected on the Heath, particularly Parliament Hill Fields, which is perhaps reflective of the omission of this policy from the TVIA assessment. It is however noted that numerous viewpoints have been selected at the summit of Parliament Hill.

It is understood that the massing currently assessed is illustrative to a degree, albeit the extent of the building volumes is indicated in the submitted parameter plans. There is a concern that the north-south axis of the site will inevitably lead to a coalescence of the mass of the buildings in many views from the Heath.

The City Corporation would welcome proposals which seek to ensure that gaps between buildings can be easily understood in views from the Heath, particularly when considering the siting of taller elements of the scheme on the western side of the Site.

It is anticipated that this massing will be most evident in close proximity to the Grade II listed Parliament Hill Fields Lido.

Dartmouth Park Neighbourhood Forum have made the following comments:

One of the main impacts of the over-development of the site and the way that it has been designed with almost no perceptible appreciation of context is on views. The visual impact on views from and of Hampstead Heath, on the surrounding Conservation Areas and residential neighbourhoods, and on amenities such as Kentish Town City Farm are quickly dismissed in a set of documents that do not appear to give an accurate or balanced assessment.

The relevant policies include those mentioned under 'design' in the preceding section, in addition to those highlighted in Historic England's strong rejection of the application. Because Historic England

has set out the argument on views from Hampstead Heath so clearly, we do not repeat them here. We wholly endorse Historic England's position. We would also note that it is not just the protected views from Parliament Hill that will be affected – the view of the City and beyond from around the bandstand – a view that anchors Parliament Hill as part of London - will be particularly ruined, with the new development suddenly becoming the view.

The view of Parliament Hill from Kentish Town is protected in the Local Plan via the Kentish Town Neighbourhood Plan, with a clear policy about the viewing cone itself and a peripheral zone. At the time of the KTNP being made, it was cited by the Chair as being the Plan's most important and popular policy. The way that it has been treated by the design team is symptomatic of their general approach to the project. Early in the process they declared that the view was actually from the wrong place and decided to unilaterally impose their own view. And then they produced a scheme that almost entirely blocks their own view! This is clear from the wireframe images shown for view 12a (the protected KTNP view) and view 12b (presumably the alternative) in the applicant's TVIA. It doesn't matter if they respect the view or think they know better; what matters is that, after 1717 local people voted 'yes' in the KTNP referendum, the view is protected in policy.

The methodology of the TVIA has been correctly questioned by Historic England. The report itself does not claim to use the industry standard 'Guidelines for Landscape and Visual Impact Assessment', produced by the Landscape Institute with the Institute of Environmental Management and Assessment, preferring to be "based on the principles of" instead.

The TVIA comes to some very odd conclusions. The impact of the virtual blocking of the protected KTNP view is assessed as being "a change of moderate magnitude to a view of low-medium sensitivity. The significance is moderate (significant). The effect is beneficial". It is not credible that the TVIA also concludes that the effect of the development on several other views, including a number from Parliament Hill that have alarmed the public and statutory agencies (such as views 1, 25, 27, 28 (a protected London View Management Framework view)) to be beneficial. Other eyebrow-raising 'beneficial' assessments are given to the view of the grade II listed Christ Apostolic Church which is silhouetted against the sky (view 8) and the view from the City Farm (view 19).

The cavalier approach to views, including specifically protected ones, must be a fatal blow to the planning application

Scope of additional mitigation measures

No comments.

Residual effects

The effects in this assessment should be classified as per the EIA methodology i.e., direct or indirect; permanent or temporary; and short term, medium term or long term.

20.2 Recommendations

Are any clarifications recommended?

- Table 1 does not highlight minor to moderate effects, as it does moderate and major effects. It is therefore not clear if minor to moderate effects would be considered to be significant in this assessment. Including this range as significant would be consistent with the wider ES i.e., a moderate effect being significant. It does appear from Table 3 (residual effects) that minor to moderate is not considered significant in ES terms in this assessment. Clarification is required on this point as this contradicts the wider ES methodology (moderate being significant).
- Historic England has highlighted that *"The TVIA methodology confirms that the images shown in the TVIA have been taken with a 24mm lens. Good practice guidance suggests that this does not most accurately reflect what the human eye sees. We encourage the applicants to produce views in line with the Landscape Institute Technical Guidance Note 06/19 Visual Representation of development proposals, which specifies a 50mm lens"*. A response is required on this point, to confirm why this approach has been used and if necessary the assessment may require updating.
- Paragraph 3.46 states *"The approach to cumulative assessment is to focus on the additional effects of the Proposed Development on top of the cumulative baseline"*. This would in fact be a scheme impact assessment on top of a future baseline, as opposed to a cumulative effects assessment and therefore the assessment of cumulative effects may be missing. This appears to be the approach taken, as the cumulative effects assessment refers to the impact of the proposed development not the impact of the proposed development in conjunction with cumulative schemes on the existing baseline. There is value in undertaking an assessment of the impacts and effects of the proposed development, on top of the future baseline, however this does not negate the need for cumulative effects assessment. The cumulative effects assessment, should focus on the combined effects of the proposed development, alongside the cumulative development schemes, on the existing baseline. Confirmation is required on this point and on the approach taken.
- Clarification is required on the reasoning / effects predicted for Parliament Hill and Kentish Town station, in response to the Historic England comments on the planning application.
- The City of London Corporation have queried why there are a limited number of viewpoints from the Hamstead Heath. Clarification is required on this point.
- Dartmouth Park Neighbourhood Forum have raised a number of queries regarding the conclusions made in regard to effects and their significance and clarification is required on the points that they have raised. They have also raised the need to consider views from Kentish Town Farm, which should be discussed further with LBC

Are any Regulation 25 requests for "further information" recommended?

- Possible in regard to photography methodology i.e., 24mm lens vs 50mm lens, subject to a response to the query raised above;
- Possible in regard to the cumulative effects assessment, subject to a response to the query raised above;

- The effects in this assessment should be classified as per the EIA methodology i.e., direct or indirect; permanent or temporary; and short term, medium term or long term.
- Possible in regard to additional views, to be discussed with LBC in light of consultee responses.
- Further recommendations to be made, subject to the response made to the points raised by consultees discussed above.

Are there any further recommendations?

- No.

21 Non-Technical Summary

21.1 Summary of ES review findings

Introduction

No comments.

Assessment Methodology

The consultation section does not fully acknowledge the EIA scoping process undertaken with LBC. Whilst the ES may have been submitted ahead of the formal EIA scoping opinion being received, there was consultation undertaken that is relevant and not mentioned. This included:

- The pre-scoping submission discussion between Trium, DP9, LBC and Buro Happold
- The draft of the EIA scoping opinion being issued ahead of the application being submitted.

Environmental Context

No comments.

Alternatives and Design Evolution

Updates made in response to comments on Volume 1 of the ES should be reflected in an Addendum to the NTS.

The Proposed Development

Updates made in response to comments on Volume 1 of the ES should be reflected in an Addendum to the NTS.

Environmental Impact Assessment

The nature of the environmental effects i.e., permanent or temporary; and short term, medium term or long term are not summarised in the NTS.

Updates made in response to comments on Volume 1 of the ES should be reflected in an Addendum to the NTS.

21.2 Recommendations

Are any clarifications recommended?

- No

Are any Regulation 25 requests for "further information" recommended?

- Updates made in response to comments on Volume 1 of the ES should be reflected in an Addendum to the NTS.

Are there any further recommendations?

- No.

22 Review of cross cutting issues

22.1 Compliance with the EIA scoping opinion

There are a number of areas, evident to Buro Happold, of non-compliance with the EIA Scoping Opinion as summarised in Table 22-1.

Table 22-1 Aspect of EIA Scoping Opinion not complied with

Aspect of EIA Scoping Opinion	Comments in regard to compliance	Recommendation
<p><i>The EIA Scoping Report includes the following statement:</i></p> <p><i>"...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".</i></p> <p><i>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). 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.</i></p>	<p>The ES generally follows the methodology set out in regard to identifying whether effects are direct, indirect, short, medium, long term, permanent and temporary effects. However, this is not done consistently as highlighted in the technical review sections of this report, for example in the Greenhouse Gas emissions assessment and the various cumulative assessments.</p>	<p>This should be addressed in an ES Addendum as this is also a compliance issue with regard to Schedule 4 of the EIA Regulations</p>
<p><i>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.</i></p>	<p>There is no explicit commentary on the need for monitoring of residual significant effects.</p>	<p>Clarification from the applicant on whether the need for monitoring of significant residual effects has been recommended by the various technical specialists or not. A statement should be included in any ES Addendum on this matter to comply with the EIA Scoping Opinion</p>
<p><i>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</i></p>	<p>The ES does not provide a comparison of the environmental effects for the design alternatives considered.</p>	<p>This should be addressed in an update to the ES (i.e., in an ES Addendum)</p>

Aspect of EIA Scoping Opinion	Comments in regard to compliance	Recommendation
<i>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.</i>		
<i>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.</i>	Phase 1 in isolation has not been assessed, understandably because the planning application was submitted entirely in outline.	Resolution to points raised in section 22.2 of this report required before advising further.
As per paragraph 225 of the EIA scoping report, the ES was to include for the assessment of light pollution, should the development include extensive artificial lighting. <i>Should the Proposed Development include highly glazed areas of commercial use where extensive artificial lighting may be used and within approximately 20m of nearby residential accommodation, an assessment of light pollution will be undertaken.</i>	There is a lack of commentary on whether this was triggered or not, but given that it is not included in the ES we assume not.	Confirmation required that such artificial lighting is not proposed.

22.2 Compliance with 2017 EIA Regulations

An Appendix to Chapter 1 signposts where the requirements of Schedule 4 of the EIA Regulations have been met.

In reviewing the EIA process followed, potential aspects that could be challenged have been identified.

EIA scoping opinion compliance

Regulation 18(4)(a) states:

(4) An environmental statement must— (a) where a scoping opinion or direction has been issued in accordance with regulation 15 or 16, be based on the most recent scoping opinion or direction issued (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion or direction);

There are two points here that need to be considered:

1. Should the ES be updated to be "based" on the EIA Scoping Opinion adopted? Note this was adopted after the ES was submitted for planning, but ahead of the application being determined.

2. Is the development assessed “materially the same as the proposed development which was subject to that opinion or direction”? Note the EIA Scoping Opinion was based on a part outline, part detailed planning application as opposed to an outline planning application.

Further discussion (and potentially legal counsel) on the above is recommended, as there is the potential for these points to be interpreted in different ways.

As a formal EIA Scoping Opinion was not adopted at the time of the ES being submitted, it was theoretically not possible to comply with it at the time of the submission of the ES (albeit a draft of the EIA Scoping Opinion was made available ahead of submission of the ES which the applicant acknowledged and commented on). An EIA Scoping Opinion has been adopted ahead of the planning application being determined. Therefore, there may be a potential argument to be made that the ES should be updated, if there are any discrepancies between the two (see section 22.1 above), ahead of it being determined.

The ES has not complied with the draft EIA Scoping Opinion (and formal opinion) issued in places, because of the difference between what is appropriate for a part detailed, part outline planning application and an outline planning application, in terms of assessment approach (for example, the wind scenarios tested). However, if the legal interpretation of the EIA Regulations is that the ES should comply with the EIA Scoping Opinion adopted (to be confirmed), this would be a potential position of conflict in process.

A confirmed position on point 1 and point 2 above from a planning lawyer ahead of agreement being made on the need for any Regulation 25 Requests would be helpful.

As per Regulation 26(2) of the EIA Regulations, the environmental information before the local planning authority needs to be up to date at the time of making a decision on the planning application (i.e., at the planning committee). Given that the ES was submitted in June 2021, there is a risk that some aspects of the ES may be out of date. The applicant and their appointed team should confirm that the following remains valid in light of the lapse in time:

- The baseline assessed
- The cumulative schemes assessed (further schemes coming forward since the submission of the application, that will need to be considered in any ES Addendum)
- The effects predicted

Other potential non-compliances

Other potential non-compliances have been raised in the relevant sections of this report.

There is a recurring recommendation, that we are happy to discuss further, for the effects to be further classified, where they have not been classified (notably in the greenhouse gas emissions assessment and cumulative assessments) in regard to direct, indirect, short, medium, long term, permanent and temporary effects. This is a requirement of Schedule 4 of the EIA Regulations, as follows (and had been committed to via EIA scoping and in the methodology of the ES):

The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union or

Member State level which are relevant to the project, including in particular those established under Council Directive 92/43/EEC(a) and Directive 2009/147/EC(b).

Note schedule 4 is an Annex to Regulation 18(3), which is itself linked to Regulation 25 (Further information and evidence respecting environmental statements). This should be relatively straightforward to rectify in an ES Addendum.

22.3 Compliance with IEMA Review Criteria

In summary, the ES does not comply with the following aspects of the IEMA ES Review Criteria:

- Not all effects in the ES are summarised as direct, indirect, secondary, short, medium, long-term, permanent and temporary. See the comments on technical chapters.
- The ES does not fully comply with the EIA Scoping Opinion.
- The ES does not provide a comparison of the environmental effects for the design alternatives considered.
- The ES does not explicitly outline any issues raised by consultees not dealt with in the ES.

A full review of ES compliance with the IEMA Review Criteria is included in Appendix A to this report.

22.4 Cross cutting consultation responses

An objection has been raised by the West Kentish Town and Gospel Oak Neighbourhood Forum, which cuts across several aspects of the ES and also ecology (as an environmental issue scoped out of the ES). It is recommended that the applicant reviews and provides a response to the points raised by this consultee. LBC and the applicant should then agree what further updates should be provided, in an ES addendum as required. The objection covers the following points that will need to be reviewed by the applicant:

1. Impacts on residents – relevant to daylight and sunlight; noise; glare; and human health.
2. Impact on Kentish Town City Farm – how the farm has been considered as a receptor, relevant to the socio-economics, human health and ecology.
3. Impact on nature and biodiversity – relevant to ecology.
4. Impact on the climate – relevant to greenhouse gas emissions.
5. Impact on population density – relevant to socio-economics.
6. Failure to mitigate harm – relevant to townscape visual, ecology, daylight, sunlight, greenhouse gas emissions, human health and socio-economics.

The City of London Corporation have raised concerns regarding visitor numbers and the impact on Hamstead Heath in relation to ecology. Whilst this topic is scoped out of the ES, it should be clarified that the applicant does not consider this to be a significant effect.

22.5 Recommendations

Are any clarifications recommended?

- A number of clarifications raised in section 22.2.
- Clarification required on the points raised by West Kentish Town and Gospel Oak Neighbourhood Forum on the ES as per section 22.4.
- Commentary of the recommended need for monitoring of significant residual effects

Are any Regulation 25 requests for "further information" recommended?

- Likely, subject to clarifications raised in section 22.2 and 22.4.

Are there any further recommendations?

- No

Appendix A - Compliance Review with IEMA Review Criteria

IEMA EIA Quality Mark Review Criteria – Murphy’s Yard, LB of Camden

IEMA Quality Mark Criteria	Comments/Notes	RAG rating?
COM1: EIA Management F) Competent Expertise	COM1 A-E - not relevant to an ES review and therefore not considered further	
COM2: EIA Team Capabilities	COM2 - not relevant to an ES review and therefore not considered further.	
COM3: EIA Regulatory Compliance		
A) Does the ES contain a clear section, or sections, providing a description of the development comprising information on the site, design and size of the development during construction and operation?	Yes, included in Chapter 4 The Proposed Development	
B) Does the ES contain a section, or sections, that outline of the main alternatives studied by the developer and an indication of the main reasons for his choice, taking into account the environmental effects?	Yes, included in Chapter 3 Alternatives and Design Evolution	
C) Does the ES contain a clear section, or sections, that provides the data required to identify and assess the main effects which the development is likely to have on the environment?	Yes, included in each of the technical assessments	
D) In the light of the development being assessed has the ES identified, described and assessed effects on the following sub-criteria: <ul style="list-style-type: none"> • Population and human health • Biodiversity • Soil • Water • Air • Climatic Change • Landscape • Cultural Heritage • Material Assets • Major Accidents and Disasters • Other 	Yes, included in each of the technical assessments or within the EIA scoping report (if deemed not to be significant at that stage)	

IEMA Quality Mark Criteria	Comments/Notes	RAG rating?
E) Does the ES attempt to set out the interaction between the factors set out under COM1 D)?	Yes, included in Chapter 14 Effects Interactions	
F) Does the ES contain a section, or sections, that describe the likely significant effects of the proposed development on the environment, including as reasonably required: direct, indirect, secondary, cumulative, short, medium, long-term, permanent and temporary, positive and negative effects?	To an extent in the technical chapters and summarised in Chapter 15 Like Significant Effects and Conclusions The proposed development effects in relation to Townscape and Visual impacts are not summarised in this way. The cumulative effects are not summarised in this way throughout the majority of the ES. The exception being socio-economics	
G) Does the ES contain a clear section, or sections, that provides a description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects?	Yes, included in the technical assessments and also Chapter 16 Environmental Management, Mitigation and Monitoring Schedule	
H) Has a Non-Technical Summary been produced containing an outline of the information mentioned in COM1 A) to G)?	Yes a NTS has been produced	
I) Does the ES contain a section, or sections, that outline any difficulties encountered by the developer in compiling the information presented in the ES?	Yes, each of the technical assessments include a section of assumptions and limitations	
COM4: EIA Context & Influence		
A) <i>Scoping</i> i) Has the ES complied with a Scoping Opinion if one has been issued (may not be applicable)	To an extent, but not fully. Further discussion is required on this point as the developer has not complied with the EIA scoping for good reason in places, i.e. the scheme was submitted as fully outline not hybrid in nature, which was the nature of application that the EIA was scoped for.	
ii) Has the ES clearly stated what environmental topics will be addressed and how this decision was reached?	Yes, included in Chapter 2 EIA Methodology	
iii) Are the main sensitive receptors and their locations clearly identified with an explanation of the risks posed from the development?	Yes, included in each of the technical assessments	
iv) Does the ES identify the environmental topics, raised during the scoping process, that will not be assessed and explain why they are not being considered further?	Yes, included in Chapter 2 EIA Methodology	
v) For those environmental topics scoped into the EIA, is it clear that the assessment has	Yes, included in each of the technical assessments	

IEMA Quality Mark Criteria	Comments/Notes	RAG rating?
focussed on sub-issues relevant to the proposed development effects on each topic?		
B) <i>Alternatives, including iterative design</i> i) Does the ES set out the main alternatives / iterations that were considered at different points during the development of the proposal?	Yes, included in Chapter 3 Alternatives and Design Evolution	
ii) Are the main reasons, environmental or otherwise, for the selection of the proposal over distinct alternatives and design iterations easily identifiable?	Yes, included in Chapter 3 Alternatives and Design Evolution	
iii) Does the ES clearly indicate how the EIA process, environmental effects and consultee responses influenced the iterative design process that led to the proposed development?	Yes, included in Chapter 3 Alternatives and Design Evolution	
C) <i>Consultation</i> i) Does the description of any consultation include an indication of those contacted, including statutory and non-statutory consultees, and the public?	Yes, included in Chapter 3 Alternatives and Design Evolution	
ii) Does the main text of the ES provide a summary of the main issues, pertinent to the EIA, raised by consultees?	Yes, included in Chapter 3 Alternatives and Design Evolution	
iii) Does the ES provide an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects?	The commentary in Chapter 3 refers to improvements made in regard to different environmental topics, however there is no measurable "comparison of the environmental effects" (in terms of commentary on effect significance) beyond stating that improvements were made.	
iv) Does the ES set out if any of the issues pertinent to the EIA raised by consultees will not be dealt with in the ES? If so, is clear justification set out as to why the issue was scoped out?	Not explicitly	
COM5: EIA Content		
A) <i>Baseline</i> i) Does the ES describe the condition of those aspects of the environment that are likely to be significantly affected by the development?	Yes, included in each of the technical assessments	

IEMA Quality Mark Criteria	Comments/Notes	RAG rating?
ii) Is the 'sensitivity'5 of the baseline environment clearly evaluated?	Yes, included in each of the technical assessments	
iii) Where limitations in the baseline information exist, which could influence the assessment findings, are they easily identifiable?	Yes, included in each of the technical assessments	
<i>B) Assessment</i> i) Are the methods for establishing the 'magnitude'3 of effects on the receiving environment clearly defined?	Yes, included in each of the technical assessments	
ii) Where the ES sets out a generic method for evaluating significance, is this applied throughout the ES? Where an over-arching approach is not followed are the specific methods used to evaluate significance for each environmental topic clearly justified?	Yes, included in each of the technical assessments	
iii) Does the evaluation of significance consider the different stages of development (construction, operation) and relate the effects identified to the condition of the baseline environment?	Yes, included in each of the technical assessments	
iv) Does the ES give appropriate prominence to both positive and negative effects relative to their significance?	Yes, included in each of the technical assessments	
v) Does the ES identify the significance of effects that are anticipated to remain following the successful implementation of any mitigation described in the ES?	Yes, included in each of the technical assessments	
vi) Is it clear that the EIA has considered inter-relationships in order to identify secondary, cumulative and synergistic effects?	Yes, included in each of the technical assessments and also Chapter 14 Effects Interactions	
<i>C) Environmental Mitigation & Management</i> i) Does the ES describe the measures proposed to be implemented to avoid, reduce, or offset significant adverse effects of the proposed development?	Yes, included in each of the technical assessments and also Chapter 16 Environmental Management, Mitigation and Monitoring Schedule	
ii) Is an attempt to indicate the effectiveness of the influence of the stated mitigation	Yes, included in each of the technical assessments	

IEMA Quality Mark Criteria	Comments/Notes	RAG rating?
measures on the significance of the environmental effects provided?		
iii) Does the ES set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies?	Yes in Chapter 16 Environmental Management, Mitigation and Monitoring Schedule	
COM6: EIA Presentation		
A) <i>ES Quality</i> i) Does the ES make effective use of maps, figures, tables and diagrams? In particular covering: - the location of the site, its boundary and site layout; - operational appearance (where available); - main environmental receptors; and - environmental effects (where visual representation is appropriate).	Yes, included in each of the technical assessments	
ii) Is the proposed development site clearly described?	Yes, included in Chapter 4 The Proposed Development	
iii) Are the anticipated timescales of construction, operation and (where appropriate) decommissioning of the proposed development clearly set out in the main text?	Yes, included in Chapter 5 Demolition and Construction	
iv) Is the ES presented in a manner that would allow a member of the public to logically locate the environmental information they were seeking?	Yes, it is presented in line with good practice and also includes a NTS	
v) Are technical terms kept to a minimum, with a glossary (/ list of acronyms) provided?	Yes, in our opinion	
vi) Is the length of the main text of the ES appropriate to the: proposed development, sensitivity of the receiving environment and significant environmental effects identified?	Yes, in our opinion	
B) <i>Non-Technical Summary (NTS)</i> i) Does the NTS provide sufficient information for a member of the public to understand the significant environmental effects of the proposed development without having to refer to main text of the ES?	Yes	

IEMA Quality Mark Criteria	Comments/Notes	RAG rating?
ii) Are maps and diagrams included in the NTS that, at a minimum, illustrate the location of the application site, the boundary of the proposed development, and the location of key environmental receptors?	Yes	
iii) Is it clear that the NTS was made available as a separate stand-alone document?	Yes	
<p>Additional Qualitative Review Comments</p> <p>Notwithstanding the formal Criteria listed above are there any aspects that the assessor wishes to highlight and provide feedback to the registrant with respect to any particular assessment chapters or sections which are considered to be in the assessor's opinion either a). an especially poor example of practice or b). could be considered a potential exemplar of good practice?</p>	See review report	

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