

## **O2 FINCHLEY ROAD**

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Review of EIA Scoping Report (Plowman Craven,  
May 2021)

### **Review Report**




October 2021

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# 1.0 INTRODUCTION

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## BACKGROUND

- 1.1 The Environmental Planning & Assessment team at CBRE Limited ('CBRE') has been commissioned by the London Borough of Camden (LB Camden) to provide independent Environmental Impact Assessment (EIA) advice in relation to a proposed development at a site on Finchley Road in the London Borough of Camden.
- 1.2 In due course, Landsec ('the Applicant') will be submitting a hybrid planning application for the scheme, with the first two phases to be provided in detail and the remainder in outline. The planning application will be submitted to LB Camden for approval, who are the determining authority.
- 1.3 The application site is approximately 5.7 ha in area and currently comprises the O2 Centre (which is arranged over three floors, and contains a cinema, a mix of retail units, restaurants and cafes, a health club, community room and a Sainsbury's store), a car-park, a Homebase store, and a number of purpose-built car showrooms and a builder's depot.
- 1.4 The proposals comprise the comprehensive redevelopment of the site to deliver a residential-led mixed use development. The proposals are expected to provide up to 2,000 residential dwellings and approximately 200,000 sqft of non-residential floorspace.
- 1.5 In line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended in 2018 and 2020), the Applicant recognises the need for the proposed development to follow the full EIA process, culminating in the preparation of an Environmental Statement (ES), which will be submitted in support of the planning application in due course. The Applicant has commissioned Plowman Craven as Lead EIA Consultant for the scheme.
- 1.6 The purpose of this document is to report the outcome of CBRE's review of the EIA Scoping Report, prepared by Plowman Craven Ltd (PCL) (dated May 2021), and provide commentary suitable for inclusion in LB Camden's EIA Scoping Opinion.

## THE STRUCTURE OF THIS DOCUMENT

- 1.7 The remaining parts of this report are structured as follows:
  - An assessment of regulatory compliance;
  - Review of proposed EIA approach; and
  - Summary and conclusions.



## 2.0 REGULATORY COMPLIANCE

### THE DEVELOPMENT IN THE CONTEXT OF THE EIA REGULATIONS

- 2.1 The procedures for carrying out EIA for a proposed development within the terrestrial environment are set out within the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended in 2018<sup>1</sup> and 2020<sup>2</sup>) - herein the 'EIA Regulations 2017'.
- 2.2 The proposed development is not Schedule 1 development, for which EIA would be mandatory. It is however of a type listed within the descriptions of development contained within Schedule 2, falling under category 10(b) urban development projects (including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas).
- 2.3 A development is considered to be Schedule 2 development if any part of it lies within a 'sensitive area' or if it meets or exceeds the relevant thresholds and criteria for that category of development, as detailed in the EIA Regulations 2017. For category 10(b) projects, these are as follows:
  - The development includes more than 1 hectare of urban development which is not dwelling-house development; or
  - The development includes more than 150 dwellings; or
  - The overall area of the development exceeds 5 hectares.
- 2.4 The proposed development does not lie within a sensitive area; however, on the basis that it would exceed both the 150 dwellings threshold and the 5 hectare overall development area threshold, it is considered to be Schedule 2 development and would therefore fall within the scope of the regulations. Schedule 2 developments are considered to be 'EIA development' if they are likely to result in significant effects on the environment by virtue of factors such as their nature, size and location.
- 2.5 As set out in the EIA Scoping Report, the Applicant has determined that the proposed development will constitute EIA development and therefore proposes to voluntarily submit an ES in due course, in conjunction with the planning application.

### EIA SCOPING COMPLIANCE

#### Consultation

- 2.6 No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

#### CBRE Review

- 2.7 Regulation 15(2)(a) of the EIA Regulations 2017, sets out what must be included in a Request for a Scoping Opinion. Table 2.1 below sets out the EIA Scoping Report's compliance with the requirement of this Regulation.

<sup>1</sup> The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018

<sup>2</sup> The Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020



# REGULATORY COMPLIANCE

**Table 2.1**  
**Review of the EIA Scoping Report in respect of the EIA Regulations**

EIA REGULATION REQUIREMENT	REQUIREMENT MET IN THE EIA SCOPING REPORT?
A plan sufficient to identify the land	Yes - a site location plan is provided in Figure 1.1 in Section 1 of the EIA Scoping Report.
A brief description of the nature and purpose of the development, including its location and technical capacity	Yes — a brief description of the application site and the nature and purpose of the proposed development are provided in Sections 2 and 5 of the EIA Scoping Report respectively.
An explanation of the likely significant effects of the development on the environment	Yes — the potential for likely significant effects as a result of the proposed development is discussed within Sections 3 and 6 of the EIA Scoping Report.
Such other information or representations as the person making the request may wish to provide or make	Yes — additional information on the proposed EIA methodology has been included throughout the EIA Scoping Report.

2.8 As set out in the table above, the EIA Scoping Report is considered to meet the necessary regulatory requirements.



## 3.0 REVIEW OF PROPOSED EIA APPROACH

- 3.1 The outcome of CBRE's review of the proposed EIA approach is set out in this chapter. The review takes into account comments provided by the consultees. Where additional assessment work has been recommended, this is clearly set out under each technical topic heading in chronological order.
- 3.2 In undertaking this review, CBRE have had regard to:
- (a) any information provided by the Applicant about the proposed development;
  - (b) the specific characteristics of the particular development;
  - (c) the specific characteristics of development of the type concerned; and
  - (d) the environmental features likely to be significantly affected by the development (Regulation 15(6)).
- 3.3 Responses from the following consultees have been taken into account in undertaking this review:
- LBC Contamination Land Team;
  - The Environment Agency;
  - Natural England;
  - Historic England;
  - Historic England (GLAAS);
  - Thames Water;
  - Sport England;
  - Camden Clinical Commissioning Group (CCG); and
  - Metropolitan Police.
- 3.4 The consultation responses are provided in full in Appendix A.

### INTRODUCTION

#### Consultation

- 3.5 No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

#### CBRE Review

- 3.6 This section of the EIA Scoping Report provides a brief overview of the application site, the proposed development in the context of the EIA Regulations 2017 and the purpose of the EIA Scoping Report. The information provided here is generally considered acceptable. Comments on the acceptability of the proposed EIA scope itself are provided later in this report.

### THE SITE

#### Consultation

- 3.7 No responses have been received from the consultees in relation to this section of the EIA Scoping Report.



## REVIEW OF PROPOSED EIA APPROACH

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### CBRE Review

- 3.8 This section of the EIA Scoping Report provides a helpful overview of the application site and surrounding context, including key environmental designations. The information provided here is considered acceptable.

### EIA APPROACH

#### Consultation

- 3.9 No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

#### CBRE Review

- 3.10 This section of the EIA Scoping Report provides an overview of the need for the EIA; the proposed content of the ES; and the general methodology applied across the EIA, including assessment of cumulative effects.
- 3.11 The proposed parameter plans, design code, illustrative masterplan and area schedules to support the outline elements of the application are supported. Consideration should also be given to provision of minimum quantum parameters/schedule for any proposed employment generating uses to allow a conservative/worst case assessment of the employment generation of the scheme during the operational phase.
- 3.12 The effects of the scheme will generally be assessed in the context of the existing baseline conditions, with the exception of transport, air quality, and noise and vibration, *“where a future baseline, namely the year of the proposed development’s completion, will be considered.”* Assessment of construction phase effects related to transport, air quality etc. against a future baseline scenario based on the opening year of the scheme would not be appropriate. These assessments should be based on appropriate assumptions for the period in which the assessment scenario is based (e.g. including baseline conditions and construction trip rates expected at that time).
- 3.13 It is stated that *“on the basis of a phased construction programme, the assessment of the construction effects will be assessed over 2 stages, namely an initial stage early on in the construction programme and a later stage when occupants will likely have moved in to completed residential and non-residential uses.”* Given the length of the construction phase (15 years) and that sensitive uses will become occupied while works are ongoing, CBRE agree that assessment of multiple construction phase scenarios is a robust and appropriate approach. Provided that the second scenario considers a robust ‘worst case’ for effects on newly occupied sensitive receptors introduced under the proposals and the results indicate that, with mitigation in place, significance adverse effects on said receptors are not anticipated then assessment of two construction phase scenarios is considered sufficient. However, if this is not the case then CBRE advise that a third construction phase scenario should also be assessed and reported in the relevant technical ES chapters (e.g. air quality and noise and vibration).
- 3.14 The significance descriptors are set out on page 16. It is stated that *“the terms will be used in the ES, unless otherwise stated within individual chapters”*. CBRE strongly recommend that, wherever possible, consistent significance descriptors are used across the ES, as this allows a fair comparison of the results reported across the chapters, which is an important outcome of the EIA process.



## REVIEW OF PROPOSED EIA APPROACH

- 3.15 It is stated on page 17 that *“best practice and guidance requires that certain technical disciplines are required to follow topic specific criteria for determining significance. This includes Air Quality, Noise & Vibration, Townscape and Visual Effects, Archaeology and Built Heritage, and Ecology. Where this is the case, the criteria to be used will be presented clearly in the methodology section of the technical chapters within the ES.”* This is understood; however, CBRE wish to highlight that, whether there is specific industry guidance available or not (although there is now guidance available for most topics), topic specific receptor sensitivity, impact magnitude and significance of effect criteria should be provided for all topics scoped into the ES and the criteria should be set out within each of the relevant chapters. The criteria should be comprehensive, transparent and repeatable.
- 3.16 The approach to the assessment of cumulative effects is set out in Section 3.6.2 and the list of committed developments to be considered in the assessment is provided in Table 3.2. The methodology set out in the scoping report is considered broadly acceptable. In line with the EIA Regulations 2017, it is agreed that local schemes with planning consent, or resolution to grant, should be scoped in. However, legal advice previously provided to CBRE indicates that this should potentially include any scheme consented prior to planning determination for the proposed development in question. As such, it is recommended that the final list of cumulative schemes is agreed with LB Camden again closer to the planning application submission date.
- 3.17 The approach to the identification of mitigation measures is also discussed. The Applicant should ensure that the ES includes details of how each of the proposed mitigation will be secured.
- 3.18 This section of the EIA Scoping Report also includes sections setting out the topics considered likely to exhibit significant effects and the topics where significant effects are considered unlikely to arise. The topics proposed to be scoped out, on the basis that significant effects are considered unlikely to arise, are discussed below.

### Waste

- 3.19 It is acknowledged in the EIA Scoping Report that a stand-alone Waste Management Strategy will be provided identifying the estimated volumes of waste associated with construction activities, together with details of how they will be managed, with a similar strategy in place for the operational phase.
- 3.20 As defined in the IEMA Guide to Materials and Waste in Environmental Impact Assessment<sup>3</sup>, for waste, the sensitive receptor is considered to be landfill capacity. It is therefore important to consider local landfill capacity when looking to establish the likelihood of significant waste effects, particularly for a scheme of this scale, which will inevitably result in a large amount of waste. It is stated in the Scoping Report that *“initial discussions with LBC have indicated capacity within the refuse collection and local landfill network. Work is currently ongoing in relation to the potential reuse of material through the demolition and construction process and this will be reported via the Circular Economy Statement.”*
- 3.21 Efforts should be made throughout the design and construction phases, to design out waste, and reduce the impact of non-preventable waste, which should be embedded into the design process. The Circular Economy Statement should be prepared in accordance with the Mayor of London’s Circular Economy Statement Guidance and should be submitted

<sup>3</sup> Institute of Environmental Management and Assessment (2020), IEMA guide to: Materials and Waste in Environmental Impact Assessment.



## REVIEW OF PROPOSED EIA APPROACH

alongside the planning application. Any relevant mitigation measures that are confirmed at the planning application stage should be reported in an appropriate location in the main volume of the ES. Provided the outcome of the Circular Economy Statement assessment work continues to show that sufficient local landfill capacity is available and that any waste effects will not be significant, CBRE agree that the proposal to scope out this topic from the ES is considered acceptable.

### Human Health

- 3.22 This section of the EIA Scoping Report identifies why the Applicant considers significant health effects are unlikely to arise. The Applicant proposes to scope out a stand-alone Health ES chapter on the basis that any potential adverse health effects can be suitably mitigated, e.g. via the inclusion of standard mitigation measures with a Construction Environmental Management Plan (CEMP), and that any beneficial health effects are not expected to be significant in EIA terms.
- 3.23 It is also noted that health-related effects will already be assessed within other ES chapters and reports accompanying the planning application, such as the air quality, noise, transport, socio-economics, daylight/sunlight and wind assessments. CBRE also note that the ground conditions ES chapter will cover human health elements in terms risks associated with historic/potential contamination.
- 3.24 CBRE note that in the Socio-Economic section of the EIA Scoping Report, under Chapter 6, the Applicant advises that, in line with the requirement set out in LBC Policy C1 Health and Wellbeing, a separate Health Impact Assessment (HIA) will be prepared and submitted with the planning application. The scope of the HIA will be based on the principles established within the Healthy Urban Development Unit (HUDU) guidance for HIA and will review and draw together the relevant elements of the EIA, and other aspects of the planning application including the Design and Access Statement, Landscape Strategy, Planning Statement and Energy and Sustainability Statement as applicable.
- 3.25 On this basis, the Applicant's proposal to scope out the requirement for a specific Human Health ES chapter is considered acceptable.

### Telecommunication Interference

- 3.26 The authors advise that reception interference is unlikely to be affected in the site locality due to the lack of surrounding tall buildings. In addition, they also note that EIA best practice recognises that telecommunication issues do not normally constitute environmental effects and that such issues can be dealt with by way of standard planning conditions.
- 3.27 CBRE agree that the Applicant's proposal to scope out this topic from the ES is considered acceptable.

### Energy and Sustainability

- 3.28 Standalone Energy and Sustainability Statements will be submitted in support of the application. On this basis, PCL propose to scope out a discrete assessment of energy and sustainability from the ES.
- 3.29 This approach is generally considered standard practice in EIA for urban development projects of this nature and CBRE consider it acceptable. However, it is recommended that any design information in these documents relevant to the EIA assessments (e.g. proposed



## REVIEW OF PROPOSED EIA APPROACH

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energy plant) should be reported in appropriate places in the main volume of the ES (e.g. the Proposed Development chapter).

### Utilities

- 3.30 A Utilities Statement will be submitted in support of the application and will be referenced in the ES as appropriate. PCL have stated that significant effects related to utilities are not anticipated. This approach is considered acceptable.

### Major Accidents and Disasters

- 3.31 PCL have set out a consideration of the relevant risks associated with major accidents and disasters in this section. Risks most relevant to the proposals, such as flood risks and severe weather will be considered in relevant reports/ES chapters (e.g. the Flood Risk Assessment (FRA) and Wind ES chapter). On this basis, CBRE agree the Applicant's proposal to scope out the requirement for a technical ES chapter for this topic is considered acceptable.
- 3.32 Overall, subject to the comments set out above, this section of the Scoping Report is considered acceptable.

## PLANNING POLICY AND CONTEXT

### Consultation

- 3.33 No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

### CBRE Review

- 3.34 This section of the EIA Scoping Report sets out the proposed application documents and briefly outlines the regulatory requirements and good practice guidelines. It is recommended that the application documents related to topics scoped into the ES, such as the arboricultural impact assessment and the WLC assessment, should be included within the ES appendices for ease of reference.

## THE PROPOSED DEVELOPMENT

### Consultation

- 3.35 No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

### CBRE Review

- 3.36 This section of the EIA Scoping Report sets out a brief description of the scheme, including a high level overview of the maximum design parameters, including building heights, residential unit and floorspace quanta, and car parking numbers. The length of the construction period is also identified. The information provided here is considered acceptable.

## POTENTIAL SIGNIFICANT ENVIRONMENTAL EFFECTS

- 3.37 This section of the EIA Scoping Report sets out the topics that the Applicant is proposing to scope into the ES. These are discussed below.



## REVIEW OF PROPOSED EIA APPROACH

### Noise and Vibration

#### Consultation

- 3.38 No consultee responses have been provided to CBRE in relation to this section of the EIA Scoping Report.

#### CBRE Review

- 3.39 This section sets out the proposed approach to the assessment of noise and vibration effects. The baseline conditions, potential effects and assessment scope and methodology are set out in Sections 6.1.2, 6.1.3 and 6.1.4 respectively.
- 3.40 It is noted in this section that the baseline has been derived from acoustic measurements taken between April 2018 and February 2019. Given this survey data is now 2 to 3 years old, the Applicant should consider, in consultation with the LB Camden's EHO, if these require updating as part of the full assessment to be reported in the ES.
- 3.41 As set out in Section 6.1.1, it is proposed that the assessment in the chapter will focus on noise and vibration associated with the construction works on surrounding receptors and future occupants of the proposed development. Noise impacts from operation of the proposed development on external noise sensitive receptors will also be assessed (this should include noise from traffic associated with the scheme), along with noise impacts on the proposed development from surrounding sources of noise. It is stated in Section 6.1.3, vibration impacts from operation of the proposed development on surrounding sensitive receptors are to be scoped out of the ES as no meaningful sources of vibration are expected to be caused by the proposed development in operation. This is considered acceptable. As stated, given the location of the site adjacent to the Thameslink Bedford-Brighton railway line and the London Underground Jubilee and Metropolitan lines, potential vibration impacts from the rail lines should be considered in relation to sensitive receptors introduced to the site under the proposals.
- 3.42 The methodology proposed for the evaluation of effect significance has not been provided. The Applicant should ensure that the receptor sensitivity, impact magnitude and effect significance criteria used in the assessment are comprehensive, transparent and repeatable. The inter-development cumulative noise and vibration effects assessment should take into account any committed schemes with the potential to cumulatively interact with the proposed development.
- 3.43 CBRE note that no indication of the assessment scenarios or proposed assessment years have been provided. This should be identified in the ES in due course.
- 3.44 Subject to the comments above, the proposed approach to the Noise and Vibration ES chapter is considered acceptable. However, CBRE advise that the Applicant should consult with LB Camden's EHO advisor in regard to key elements of the proposed methodology, such as the baseline survey.

### Air Quality

#### Consultation

- 3.45 No consultee responses have been provided to CBRE in relation to this section of the EIA Scoping Report.



## REVIEW OF PROPOSED EIA APPROACH

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### CBRE Review

- 3.46 This section sets out the proposed approach to the assessment of air quality effects. The baseline conditions, potential effects and assessment scope and methodology are set out in Sections 6.2.2, 6.2.3 and 6.2.4 respectively. An adequate summary of the baseline data at the site and surrounding area has been provided.
- 3.47 As set out in Sections 6.2.3 and 6.2.4 a construction phase dust assessment will be undertaken in line with IAQM guidance on the assessment of dust from demolition and construction. They comprise similar guidance but the Applicant should also consider the GLA guidance on "The Control of Dust and Emissions During Construction and Demolition". To ensure full visibility of the assessment process, including the consideration of suitable mitigation measures, the construction dust assessment should be completed and reported in the ES chapter. In line with previous comments, construction phase effects on any proposed residential receptors that become operational at the site while construction works are ongoing should also be assessed.
- 3.48 The Applicant has advised that when the required traffic data is available, construction and operational traffic generated by the scheme will be screened against the Environmental Protection UK (EPUK)/IAQM thresholds for sites within an AQMA. Should either threshold be exceeded, a full assessment of traffic emissions, including detailed modelling, will be undertaken. The effects should be reported in the Air Quality chapter in the main volume of the ES.
- 3.49 Combustion plant and generator emissions during the operational phase are proposed to be scoped out on the basis that the energy strategy proposes use of electrically powered systems and no combustion plant. On this basis, CBRE consider this is acceptable to scope out this element of the assessment; however, the applicant should consider if any back-up generators are proposed, and if so, whether the testing of this would necessitate inclusion within the assessment.
- 3.50 It is noted in Section 6.2.3 that a site suitability assessment will be undertaken to assess the potential impacts from existing air quality on proposed receptors. However, this is not discussed further in the 'Scope and Assessment Methodology' section of the Scoping Report (Section 6.2.4). CBRE agree this will be required given the site is located within an AQMA. Any proposals to mitigate potentially significant adverse effects on site users, e.g. mechanical ventilation, should be included within the scheme description chapter in the main volume of the ES.
- 3.51 It is also proposed that an air quality neutral assessment is undertaken and will be reported within the Air Quality ES chapter.
- 3.52 CBRE advise that the Applicant should consult with LB Camden's EHO advisor in regard to key elements of the proposed methodology.
- 3.53 CBRE note that no indication of the assessment scenarios or proposed assessment years have been provided. This should be identified in the ES.
- 3.54 The Applicant should ensure that the receptor sensitivity, impact magnitude and effect significance criteria used in the assessment are comprehensive, transparent and repeatable. The inter-development cumulative air quality effects assessment should take into account any committed schemes with the potential to cumulatively interact with the proposed development.



## REVIEW OF PROPOSED EIA APPROACH

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- 3.55 The approach to the mitigation proposals is discussed in Section 6.2.5 and makes reference to inclusion of a CEMP, which is considered appropriate.
- 3.56 Subject to the comments above, the proposed approach to the assessment of air quality effects is considered acceptable.

### Transport and Accessibility

#### Consultation

- 3.57 No consultee responses have been provided to CBRE in relation to this section of the EIA Scoping Report.

#### CBRE Review

- 3.58 This section of the Scoping Report sets out the proposed approach to assessing impacts associated with transport and access. The baseline conditions, potential effects and assessment scope and methodology are set out in Sections 6.3.2, 6.3.3 and 6.3.4 respectively. The baseline is provided in sufficient detail; however no reference has been made to cycling provision of facilities at the site or surrounding area. The Applicant should ensure this is considered in the ES.
- 3.59 In Section 6.3.4 of the Scoping Report, the Applicant has proposed to scope out a quantitative analysis of all elements of the transport and accessibility assessment for construction and operational phases, including severance; delay; amenity; fear and intimidation; accidents and Safety; and hazardous loads. This is on the basis that traffic movements associated with the proposed development are anticipated to be below existing traffic levels associated with the site for both construction and operation. Instead, a qualitative assessment of changes to the network in relation to vehicle trips, and pedestrian and cyclist movements, is proposed to be scoped in for the operational phase. Providing the detailed traffic modelling to be undertaken in due course confirms the anticipated traffic levels are below existing then this approach is considered acceptable. However, should the results indicate otherwise, a full quantitative assessment should be undertaken and reported in the ES chapter. Similarly, should the proposed qualitative assessment of impacts on rail capacity/demand indicate likely significant effects then a full quantitative assessment should be undertaken and reported in the ES chapter.
- 3.60 Subject to the comments above, the proposed approach to the assessment of transport and access effects is considered acceptable.

### Water Resources, Flood Risk & Drainage

#### Consultation

- 3.61 Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:
- Thames Water.

#### CBRE Review

- 3.62 This section of the Scoping Report sets out the proposed approach to assessing impacts associated with hydrology, hydrogeology and flood risk.



## REVIEW OF PROPOSED EIA APPROACH

- 3.63 PCL have proposed to scope in construction and operational phase effects on flood risk, surface water quantity and quality, groundwater quantity and quality, and wastewater drainage. Effects on onsite and offsite flood risk from all sources should be assessed, as should effects on both sewerage infrastructure and potable water demand/infrastructure. Effects on water quality should either be assessed in the Water Resources, Flood Risk & Drainage chapter or the Ground Conditions and Contamination chapter, not both.
- 3.64 The Applicant proposes to undertake consultation with the relevant statutory and non-statutory bodies. This should include the Environment Agency and Thames Water.
- 3.65 The Applicant should ensure that the receptor sensitivity, impact magnitude and effect significance criteria used in the assessment are comprehensive, transparent and repeatable. The inter-development cumulative effects assessment should take into account any committed schemes with the potential to cumulatively interact with the proposed development.
- 3.66 Thames Water have provided the following comments:
- “The EIA Regulations 2017 set out in Schedule 4 that water and wastewater issues may need to be covered in an EIA. Thames Water considers the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met. 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 3. The developments demand for water supply and network infrastructure both on and off site and can it be met. 4. Build - out/ phasing details to ensure infrastructure can be delivered ahead of occupation. 5. Any piling methodology and will it adversely affect neighbouring utility services. The developer can obtain information to support the EIA by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>”*
- 3.67 In line with Thames Water comments, should any of this information not be provided within the ES then it should be provided separately, alongside the planning application.
- 3.68 Subject to the comments above, the proposed approach to the assessment of air quality effects is considered acceptable.

### Ground Conditions and Contamination

#### Consultation

- 3.69 Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:
- LBC Contaminated Land Team.

#### CBRE Review

- 3.70 This section sets out the proposed approach to the assessment of Ground Conditions and Contamination effects. The baseline conditions, potential effects and assessment scope and methodology are set out in Sections 6.5.2, 6.5.3 and 6.5.4 respectively. An adequate summary of the baseline data at the site and surrounding area has been provided.
- 3.71 The Applicant states that due to the presence of potential contamination sources on the site and in the surrounding area (e.g. made ground), without mitigation, there is potential for significant construction and operational effects on the health of site users, controlled waters,



## REVIEW OF PROPOSED EIA APPROACH

and ground instability. Given the relatively extensive number of contamination sources identified in the baseline, CBRE agree with this analysis.

- 3.72 The Applicant proposes to scope out a cumulative assessment from the ES chapter on the basis that there is an absence of shallow aquifers to facilitate contamination migration to neighbouring sites and the lack of any migration pathways between the Made Ground and the deep aquifer within the chalk. This is considered acceptable. The other elements proposed to be scoped out of the chapter are also considered acceptable, on the basis that best practice mitigation measures including PPE and measures to mitigate potential spills etc. during the construction phase are included within the CEMP, as it is expected they will be. It is also noted that the LBC Contaminated Land Team have not raised any issue with the proposal to scope out these elements.
- 3.73 The Applicant advises that the proposed scope of the assessment will include a Phase 1 Geotechnical and Geo-environmental Desk Study and a Phase 2 geotechnical and geo-environmental site investigation. While preparation of a topic specific ES chapter is not specifically noted in this section of the report, CBRE understand from separate discussions that one is proposed to be prepared. This should be prepared as discussed.
- 3.74 The Applicant should ensure that the receptor sensitivity, impact magnitude and effect significance criteria used in the assessment are comprehensive, transparent and repeatable.
- 3.75 The LBC Contaminated Land Team have provided some additional comments in their consultation response. It is advised that the Applicant aligns with these comments when preparing the Ground Conditions ES chapter and supporting documents.
- 3.76 Subject to the comments above, the proposed approach to the assessment of this topic area is considered acceptable.

### Archaeology

#### Consultation

- 3.77 Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:
  - Historic England – GLAAS.

#### CBRE Review

- 3.78 This section provides a summary of the proposed approach to the assessment of Archaeological effects. The baseline conditions, potential effects and assessment scope and methodology are set out in Sections 6.6.2, 6.6.3 and 6.6.4 respectively. An adequate summary of the baseline data at the site and surrounding area has been provided.
- 3.79 The assessment of potential construction effects within the ES chapter will focus on physical impacts on buried heritage assets within a site from ground works including landscaping, foundation works, basements and utilities trenches.
- 3.80 An assessment of operational phase effects has been scoped out on the basis that once the Proposed Development has been completed, no further ground disturbance would occur and consequently there would be no additional impacts or resulting environmental effects upon buried heritage assets. CBRE consider this to be acceptable.



## REVIEW OF PROPOSED EIA APPROACH

- 3.81 The Applicant confirms that the desk-based assessment will conform to the requirements of the NPPF, and to relevant standards specified by the Chartered Institute for Archaeologists, and the Greater London Archaeological Advisory Service (GLAAS).
- 3.82 While an element of professional judgement in the assessment of effect significance is accepted, the Applicant should ensure that the receptor sensitivity, impact magnitude and effect significance criteria used in the assessment are comprehensive, transparent and repeatable. The inter-development cumulative effects assessment has been scoped out on the basis that no discrete and significant shared archaeological asset are anticipated at the site and therefore there is no potential to cumulatively interact with another development. CBRE consider this to be acceptable.
- 3.83 It is confirmed in the Scoping Report that an appropriate mitigation strategy will be set out in the EIA. CBRE advise that any mitigation measures required to avoid/reduce significant adverse effects must be specifically detailed in the ES chapter in the main volume of the ES and the residual effects should also be reported in the chapter.
- 3.84 In their consultation response GLAAS have advised that *“if available, the results of geotechnical site investigation logs should be incorporated into the archaeological impact assessment. This information will help to inform a decision on whether any archaeological fieldwork would be necessary to mitigate the impacts of the development.”* In line with these comments, if this information is available, it should be taken into account in the preparation of the Archaeology ES chapter.
- 3.85 Subject to the comments above, the proposed approach to this ES chapter is considered acceptable.

### Townscape, Built Heritage, and Visual

#### Consultation

- 3.86 Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:
- Historic England

#### CBRE Review

- 3.87 This section gives an overview of the proposed approach to the Townscape, Heritage and Visual Impact Assessment (THVIA). The baseline conditions, potential effects and assessment scope and methodology are set out in Sections 6.7.2, 6.7.3 and 6.7.4 respectively.
- 3.88 As set out in Section 6.7.3 of the Scoping Report, it is proposed that an assessment of effects on townscape character, built heritage and visual amenity will be scoped into the EIA and reported in an ES chapter.
- 3.89 It is proposed that the assessment methodology will be consistent with the relevant industry guidance as outlined in Section 6.7.4 of the Scoping Report. The methodology includes application of an approximate 500m radius study area for landscape character areas and scoping in of built heritage assets. CBRE advise that should the results of the assessment indicate that any receptors around the outer extent of the study area are likely to experience significant effects as a result of the proposed development, the study area should be extended to consider additional receptors at a greater distance from the site. It is welcomed that designated and non-designated heritage assets will be assessed.



## REVIEW OF PROPOSED EIA APPROACH

- 3.90 The study area for the visual assessment will be informed by site observation and visual impact testing of the emerging design in the visualiser's 3D digital model. In addition, a range of views will be selected to reflect the likely extent of the visibility of the proposed development. The Applicant has confirmed that the final list of viewpoints to inform the THVIA will be agreed in consultation with LB Camden in due course, as will the split of fully rendered visuals and wirelines. The visuals will show the baseline condition, proposed development scenario and cumulative scenario separately for each view, while for the outline elements, an additional illustrative masterplan visual will also be prepared from some views.
- 3.91 The proposed qualitative approach to the assessment of construction phase effects is accepted.
- 3.92 While the use of professional judgement in the assessment of effect significance is accepted by CBRE, the Applicant should ensure that the significance of effect criteria used in the assessment are transparent and repeatable.
- 3.93 The Applicant has confirmed the inter-development cumulative effects assessment will take into account any committed schemes with the potential to cumulatively interact with the proposed development.
- 3.94 Subject to the comments above, the proposed approach to this ES chapter is considered acceptable.

### Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution

#### Consultation

- 3.95 No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

#### CBRE Review

- 3.96 This section gives an overview of the proposed approach to the Daylight, Sunlight, Overshadowing and Solar Glare ES Chapter. The baseline conditions, potential effects and assessment scope and methodology are set out in Sections 6.8.2, 6.8.3 and 6.8.4 respectively. A comprehensive description of the baseline is provided with the sensitive receptors identified in Section 6.8.4 of the Scoping Report.
- 3.97 As set out in Section 6.8.4, it is proposed that the assessment in the chapter will focus on the operational phase of the scheme and resultant daylight, sunlight and overshadowing effects. This is common practice for such assessments and is considered acceptable. In addition, given the sensitive road and rail viewpoints from the proposed development, a solar glare assessment is also proposed to be scoped in.
- 3.98 Given the proposed commercial elements within the scheme are on the lower floors and are anticipated to close before the ILE guidance curfew time of 11pm, no specific lighting impacts on surrounding residential properties are envisaged. Therefore, a detailed light pollution assessment has been scoped out. CBRE consider this to be acceptable however, as set out in the report, this should be reviewed at the time of writing the ES Chapter in the event the proposed opening times change.
- 3.99 As set out in Section 6.8.4, the sensitive receptors that will be considered in the assessment include residential properties and amenity areas surrounding the site. CBRE note that should significant adverse effects be identified at any of these receptors, the radius of the



## REVIEW OF PROPOSED EIA APPROACH

study area should be extended to include additional receptors a greater distance from the site.

- 3.100 While an element of professional judgement in the assessment of effect significance is accepted, the Applicant should ensure that the significance of effect criteria used in the assessment are comprehensive, transparent and repeatable. The inter-development cumulative effects assessment should take into account any committed schemes with the potential to cumulatively interact with the proposed development.
- 3.101 Subject to the comments above, the proposed approach to this ES chapter is considered acceptable.

### Wind Assessment

#### Consultation

- 3.102 No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

#### CBRE Review

- 3.103 This section sets out the Applicant's proposed approach to the assessment of pedestrian wind microclimate effects. The baseline conditions, potential effects and assessment scope and methodology are set out in Sections 6.9.2, 6.9.3 and 6.9.4 respectively.
- 3.104 As set out in Section 6.9.3, it is proposed that the assessment will initially evaluate the likely comfort and safety of users of the external spaces within the site (areas in the immediate surrounding area should also be considered), in line with the Lawson criteria, and inform any necessary mitigation measures, using an initial desk based approach. Should the results of the study indicate significant effects are likely then further detailed analysis through Computation Fluid Dynamics (CFD) testing would be undertaken. It is unclear under what circumstances an ES chapter would be undertaken.
- 3.105 The scope of the proposed 'desk-based approach' is unclear but it would only provide very high-level indicative results and given that the proposals will include multiple high rise buildings, CBRE do not consider such an approach to be sufficiently informative or robust in this case. CBRE recommends that the assessment is based on CFD testing. CBRE's recommendation is in line with advice provided in the Wind Microclimate Guidelines for Development in the City of London (City of London Corporation / RWDI, 2019). Effects should be clearly assessed in the context of the Lawson comfort and safety criteria and any mitigation measures required to mitigate significant adverse effects should also be tested by CFD or wind tunnel. The assessment should be reported in a Wind ES chapter.
- 3.106 The significance of effect criteria that are applied should be comprehensive, transparent and repeatable. It is recommended that the criteria set out on page 19 of the Wind Microclimate Guidelines for Development in the City of London (City of London Corporation / RWDI, 2019) are used. Should the criteria that are used by the Applicant's consultants require any comparison of the effects of the scheme with the baseline conditions (as the criteria recommended by CBRE above do), the baseline conditions should also be assessed by CFD.
- 3.107 The inter-development cumulative wind effects assessment should take into account any committed schemes with the potential to cumulatively interact with the proposed development.



## REVIEW OF PROPOSED EIA APPROACH

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- 3.108 Subject to the comments above, the proposed approach to the assessment of wind is considered acceptable.

### Ecology

#### Consultation

- 3.109 Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:

- Natural England.

#### CBRE Review

- 3.110 This section of the Scoping Report gives an overview of the proposed approach to the Ecological assessment. The baseline conditions, potential effects and assessment scope and methodology are set out in Sections 6.10.2, 6.10.3 and 6.10.4 respectively.
- 3.111 This section of the EIA Scoping Report provides a brief overview of the current baseline conditions on site based on the previous and proposed ecological survey work. It is noted in the Scoping Report that the Preliminary Ecological Appraisal was undertaken in April 2019. The Applicant has confirmed that the surveys are currently being updated as part of the full assessment to be reported in the ES, which is welcomed given this survey data is now over 2 years old.
- 3.112 Three statutory designated sites of importance to nature conservation were identified within 2km of the site. The West Hampstead Railside, Medley Orchard and Westbere Copse site of importance to nature conservation (Borough Grade I Importance) is situated immediately to the north of the site. The current habitats on site are understood to comprise predominantly hardstanding and buildings, with areas of scattered landscaping and planting. The buildings and trees are considered to have negligible potential to support roosting bats and the site is generally considered to have limited potential to support other protected or notable species, other than potential for nesting birds. This assessment should be updated during the surveys currently being undertaken and any changes recorded.
- 3.113 The Applicant confirms the assessment of construction and operational impacts upon habitats and protected species will be based upon the published methods for Ecological Impact Assessment (EclA) which is presented in CIEEM guidelines (2018 V1.1). This is considered appropriate.
- 3.114 While an element of professional judgement in the assessment of effect significance is accepted by CBRE, the Applicant should ensure that the receptor sensitivity, impact magnitude and effect significance criteria used in the assessment are comprehensive, transparent and repeatable. In addition, the inter-development cumulative ecological effects assessment should take into account any committed schemes with the potential to cumulatively interact with the proposed development.
- 3.115 A number of potential ecological mitigation and enhancement measures are discussed in Section 6.10.4 of the Scoping Report. These are considered to be relevant for this topic, however these should be reviewed and updated following the outcome of the ecological assessment and should be reported within the Ecology chapter in the main volume of the ES.



## REVIEW OF PROPOSED EIA APPROACH

- 3.116 As the proposals are not expected to impact on any designated sites under their jurisdiction, Natural England have not provided any specific comments on the Scoping Report but have set out their standard advice within an annex to their letter.
- 3.117 On this basis, subject to the comments above, the proposed approach to the assessment of ecology is considered acceptable.

### Socio-Economics

#### Consultation

- 3.118 Responses have been received from the following consultees in relation to this section of the EIA Scoping Report:
- Camden Clinical Commissioning Group (CCG).

#### CBRE Review

- 3.119 This section of the Scoping Report gives an overview of the proposed approach to the Socio-Economic assessment. The baseline conditions, potential effects and assessment scope and methodology are set out in Sections 6.11.2, 6.11.3 and 6.11.4 respectively. An adequate description of the baseline is provided.
- 3.120 The Applicant outlines a number of potential socio-economic effects that could result from construction and operation of the proposed development, including generation of temporary employment and training opportunities during construction; loss of existing employment on-site through demolition of existing buildings; creation of permanent employment opportunities in the end uses; delivery of new homes; generation of demand for community infrastructure arising from the new residential population; and local economic effects associated with spending by new residents and employees. CBRE consider these to be appropriate and agree an assessment is required to confirm if these effects are likely to be significant in EIA terms. This should be reported in a specific Socio-Economic chapter in the main volume of the ES.
- 3.121 The Camden CCG have raised some comments in their response, including the following: *"It is unclear why only primary healthcare (GP surgeries) are included. The baseline assessment should also include community, mental health and hospital services and take into account changing models of healthcare, including the development of primary care networks and Camden and Islington NHS Foundation Trusts plans to transform mental health services and establish community hubs"*. The Socio-economics ES chapter should be prepared in line with the CCG's comments.
- 3.122 The ES chapter should provide full details of the proposed employment on-site during both the construction and operational phases, as well as the proposed quantum of new public realm and cultural provision. The data sources detailed in Section 6.11.4 of the Scoping report are considered to be acceptable.
- 3.123 It is noted in the Scoping Report that the assessment of socio-economic effects will be made with reference to the standard EIA significance criteria terminology, however no specific detail is provided. CBRE advise the Applicant should ensure that the receptor sensitivity, impact magnitude and effect significance criteria used in the assessment are comprehensive, transparent and repeatable. The inter-development cumulative socio-economic effects assessment should take into account any committed schemes with the potential to cumulatively interact with the proposed development.



## REVIEW OF PROPOSED EIA APPROACH

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- 3.124 On this basis, subject to the comments above, the proposed approach to the assessment of Socio-Economics is considered acceptable.

### Climate Change

#### Consultation

- 3.125 No responses have been received from the consultees in relation to this section of the EIA Scoping Report.

#### CBRE Review

- 3.126 The EIA Scoping Report confirms that a climate change ES chapter will be prepared, which will assess:
- The effects of the proposed development on climate change, in respect of greenhouse gas (GHG) emissions; and
  - The effects of climate change on the proposed development, including the need for climate change adaptation and resilience.
- 3.127 The assessment of GHG emissions will be assessed in line with IEMA's Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance (IEMA, 2017) the Royal Institution of Chartered Surveyors (RICS) Whole Life Carbon Assessment for the Built Environment (2017) guidance, BS EN 15978:2011, Sustainability of Construction Works - Assessment of Environmental Performance of Buildings - Calculation Method (BSI, 2011) and the draft Greater London Authority (GLA) Whole Life-Cycle Carbon Assessments Guidance (GLA, 2020).
- 3.128 The sources of GHG emissions proposed to be scoped in and scoped out of the assessment, as set out on page 96 of the report, are supported. The significance of the likely GHG effects of the proposed development should be assessed and reported in the ES chapter.
- 3.129 Subject to the comments above, the proposed approach to the assessment of climate change is considered acceptable.



## 4.0 SUMMARY AND CONCLUSIONS

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- 4.1 The Environmental Planning & Assessment team at CBRE Limited ('CBRE') has been commissioned by the London Borough of Camden (LB Camden) to provide independent Environmental Impact Assessment (EIA) advice in relation to a proposed development at O2 Finchley Road in the London Borough of Camden.
- 4.2 The purpose of this document is to report the outcome of CBRE's review of the EIA Scoping Report, prepared by Plowman Craven (dated February 2021), and provide commentary suitable for inclusion in LB Camden's EIA Scoping Opinion.
- 4.3 The EIA Scoping Report is considered to meet the necessary regulatory requirements. The outcome of CBRE's review of the proposed EIA approach is set out in Chapters 2 and 3 of this report. The review takes into account comments provided by the statutory consultees. Where additional assessment work has been recommended, this is clearly set out under each technical topic heading.



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# APPENDICES

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# Appendix A – Consultation Responses Provided to CBRE

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## Little, Patrick @ London SMC

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**From:** Davies, Louise <Louise.Davies@HistoricEngland.org.uk>  
**Sent:** 02 July 2021 14:00  
**To:** David Fowler  
**Subject:** Archaeology - The O2 Centre 255 Finchley Road London NW3 6LU - 2021/2770/P

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear David

**Re: Archaeology - The O2 Centre 255 Finchley Road London NW3 6LU - 2021/2770/P**

Thank you for the request for a scoping opinion, dated 17/06/2021.

I have reviewed the scoping opinion submission available on your website. My only comment is that, if available, the results of geotechnical site investigation logs should be incorporated into the archaeological impact assessment. This information will help to inform a decision on whether any archaeological fieldwork would be necessary to mitigate the impacts of the development.

Thanks

Louise

Louise Davies (she/her)  
Assistant Archaeology Adviser (GLAAS)  
London and South East Region  
Historic England, 4th Floor Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
020 7973 3740 07990 339949



Historic England

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-----Original Message-----

**From:** Dierks, Nina <Nina.Dierks@HistoricEngland.org.uk>  
**Sent:** 18 June 2021 10:27  
**To:** Lambert, Rebecca <Rebecca.Lambert@HistoricEngland.org.uk>  
**Cc:** Davies, Louise <Louise.Davies@HistoricEngland.org.uk>  
**Subject:** FW: Consultee letter for Planning Application: 2021/2770/P

CLO33731



-----Original Message-----

From: David Fowler <[David.Fowler@camden.gov.uk](mailto:David.Fowler@camden.gov.uk)>

Sent: 17 June 2021 10:34

To: GLAAS <[e-GLAAS@english-heritage.org.uk](mailto:e-GLAAS@english-heritage.org.uk)>

Subject: Consultee letter for PlanningApplication Application: 2021/2770/P

THIS IS AN EXTERNAL EMAIL: do not click any links or open any attachments unless you trust the sender and were expecting the content to be sent to you Please find attached Consultee letter for PlanningApplication application 2021/2770/P

Y566160

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## Little, Patrick @ London SMC

---

**From:** Greg Hitchcock  
**Sent:** 14 July 2021 16:09  
**To:** David Fowler  
**Subject:** RE: O2 - EIA 2021/2770/P

Hi David,

I've just had a quick read. They've scoped in a number of ecological receptors, including those for which information is pending. I don't have any issues or omissions.

Greg

Greg Hitchcock  
Nature Conservation Officer

Telephone: 020 7974 4937



The majority of Council staff are continuing to work at home through remote, secure access to our systems. Where possible please communicate with us by telephone or email.

---

**From:** David Fowler <David.Fowler@camden.gov.uk>

**Sent:** 14 July 2021 15:27

**To:** Gabriel Berry-Khan <Gabriel.Berry-Khan@camden.gov.uk>; Nick Bell <Nick.Bell@camden.gov.uk>; Tatai Dewes <Tatai.Dewes@camden.gov.uk>; Greg Hitchcock <Greg.Hitchcock@camden.gov.uk>; Tom Parkes <Tom.Parkes@camden.gov.uk>; Edward Davis <Edward.Davis2@camden.gov.uk>; Philippa Jopp <Philippa.Jopp@camden.gov.uk>; Colette Hatton <Colette.Hatton@camden.gov.uk>

**Subject:** O2 - EIA 2021/2770/P

**Importance:** High

Hello,

Please could I chase you all for consultation responses on this EIA (Environmental Impact Assessment) Scoping Opinion? Please see documents on our [website](#).

If it helps, please see [consultation responses](#) to a previous EIA.

Thanks,

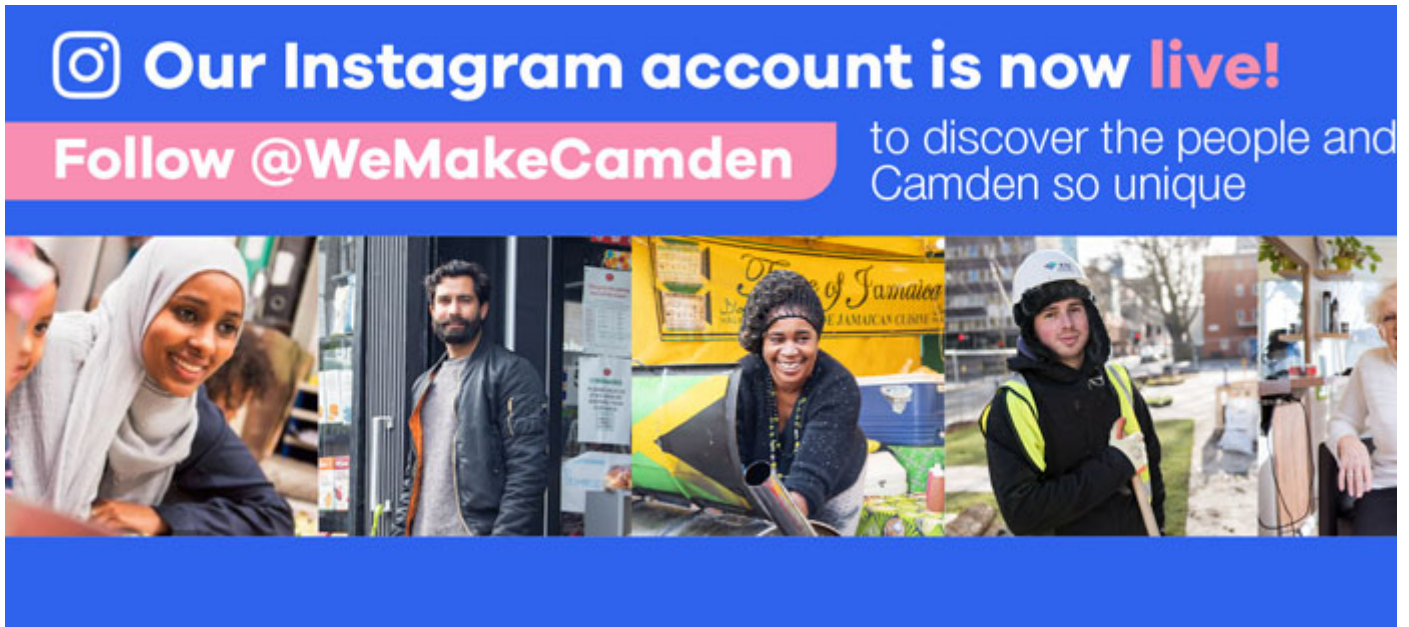
David

David Fowler  
Deputy Team Leader  
Regeneration and Planning  
Supporting Communities  
London Borough of Camden



Telephone: 0207 974 2123  
Web: [camden.gov.uk](http://camden.gov.uk)

5 Pancras Square  
5 Pancras Square  
London N1C 4AG



The majority of Council staff are continuing to work at home through remote, secure access to our systems. Where possible please communicate with us by telephone or email.

Please consider the environment before printing this email.



## Little, Patrick @ London SMC

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**From:** Planning South <Planning.South@sportengland.org>  
**Sent:** 11 June 2021 09:41  
**To:** David Fowler  
**Subject:** RE: Consultee letter for PlanningApplication Application: 2021/2770/P

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Dear David Fowler

Thank you for consulting Sport England.

Sport England considers that the impact of a development on sports facilities or activities would not normally fall within the scope of an Environmental Statement. Consequently we do not wish to comment on the Screening or Scoping Opinion consultation.

Any subsequent planning application should however consider the implications for sport in the context of NPPF Para's 96 and 97, local plan policy and any strategic evidence set out in local playing pitch and/or built facilities strategies within the normal supporting documentation for a planning application.

Sport England should be consulted on the planning application if it meets the statutory requirements contained within SI 2015/295 (development affecting playing fields) or the guidance for non-statutory consultation with Sport England contained within Planning Practice Guidance: Open Space, Sports and Recreation Facilities (Paragraph: 003).

General guidance on assessing the need to protect, enhance and provide sports facilities can be found by following the link below:

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning\\_applications](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications)

If you need any further advice please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Administration Team

[Planning.south@sportengland.org](mailto:Planning.south@sportengland.org)

Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Louise Hartley](#)

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## Little, Patrick @ London SMC

---

**From:** BCTAdmin@thameswater.co.uk  
**Sent:** 10 June 2021 10:16  
**To:** Planning Planning  
**Subject:** 3rd Party Planning Application - 2021/2770/P

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

London Borough of Camden Our DTS Ref: 65146  
Camden Town Hall Your Ref: 2021/2770/P  
Argyle Street  
Euston Road  
London  
WC1H 8EQ

10 June 2021

Dear Sir/Madam

Re: O2 CENTRE- 255, FINCHLEY ROAD, LONDON, NW3 6LU

Waste Comments

.

Water Comments

Thank you for giving Thames Water the opportunity to comment on the above application. Thames Water are the statutory water and sewerage undertaker for the area and would like to make the following comments: The EIA Regulations 2017 set out in Schedule 4 that water and wastewater issues may need to be covered in an EIA. Thames Water considers the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met. 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 3. The developments demand for water supply and network infrastructure both on and off site and can it be met. 4. Build - out/ phasing details to ensure infrastructure can be delivered ahead of occupation. 5. Any piling methodology and will it adversely affect neighbouring utility services. The developer can obtain information to support the EIA by visiting the Thames Water website

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>

Yours faithfully  
Development Planning Department

Development Planning,  
Thames Water,  
Maple Lodge STW,  
Denham Way,



Rickmansworth,  
WD3 9SQ  
Tel:020 3577 9998  
Email: devcon.team@thameswater.co.uk

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Date: 11 June 2021  
Our ref: 356129  
Your ref: 2021/2770/P



Mr D Fowler  
Camden Development Management  
Regeneration and Planning  
London Borough of Camden  
Town Hall  
Judd Street  
London WC1H 9JE

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

[planning@camden.gov.uk](mailto:planning@camden.gov.uk)

Dear Mr Fowler

**Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town & Country Planning EIA Regulations 2017):** Request for scoping opinion under Paragraph 4, Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving delivering a significant number of homes to help meet the current housing shortfall in LBC as well as new commercial uses that will create local jobs.

**Location:** The O2 Centre, 255 Finchley Road, London. NW3 6LU

Thank you for your consultation dated and received by Natural England on 8<sup>th</sup> June 2021.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The scoping request is for a proposal that does not appear, from the information provided, to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), or have significant impacts on the protection of soils (particularly of sites over 20ha of best or most versatile land), nor is the development for a mineral or waste site of over 5ha.

At present therefore it is not a priority for Natural England to advise on the detail of this EIA. We would, however, like to draw your attention to some key points of advice, presented in annex to this letter, and we would expect the final Environmental Statement (ES) to include all necessary information as outlined in Part 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017. If you believe that the development does affect one of the features listed in paragraph 3 above, please contact Natural England at [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk), and we may be able to provide further information.

Yours sincerely

Sally Ireland  
Consultations Team



## **Annex A – Advice related to EIA Scoping Requirements**

### **1. General Principles**

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

1. A description of the development, including in particular:
  - (a) a description of the location of the development;
  - (b) a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;
  - (c) a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;
  - (d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.
2. 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.
3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.
4. A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.
5. A description of the likely significant effects of the development on the environment resulting from, inter alia:
  - (a) the construction and existence of the development, including, where relevant, demolition works;
  - (b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;
  - (c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;
  - (d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);
  - (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;
  - (f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;
  - (g) the technologies and the substances used. 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).



6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.
7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.
8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

## **2. Biodiversity and Geology**

### **2.1. Ecological Aspects of an Environmental Statement**

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EcIA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EcIA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework ([NPPE](#)) sets out guidance in paragraphs 170-171 and 174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

### **2.2. Internationally and Nationally Designated Sites**

Natural England undertakes an initial assessment of all development consultations, by determining whether the location to which they relate falls within geographical 'buffer' areas within which development is likely to affect designated sites. The proposal is located outside these buffer areas and therefore appears unlikely to affect an Internationally or Nationally designated site. However, it should be recognised that the specific nature of a proposal may have the potential to lead to significant impacts arising at a greater distance than is encompassed by Natural England's buffers for designated sites. The ES should therefore thoroughly assess the potential for the proposal to affect designated sites, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSI). Should the proposal result in an emission to air or discharge to the ground or surface water catchment of a designated site then the potential effects and impact of this would need to be considered in the Environmental Statement

Local Planning Authorities, as competent authorities under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), should have regard to the Habitats Regulations Assessment process set out in Regulation 63 of the Habitats Regulations in their determination of a planning application. Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.



Statutory site locations can be found at [www.magic.gov.uk](http://www.magic.gov.uk). Further information concerning particular statutory sites can be found on the [Natural England website](#).

### **2.3. Protected Species**

The ES should assess the impact of all phases of the proposal on protected species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

Natural England has adopted [standing advice](#) for protected species. It provides a consistent level of basic advice which can be applied to any planning application that could affect protected species. It also includes links to guidance on survey and mitigation.

Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species.

### **2.4. Regionally and Locally Important Sites**

The ES should thoroughly assess the impact of the proposals on non-statutory sites, for example Local Wildlife Sites (LoWS), Local Nature Reserves (LNR) and Regionally Important Geological and Geomorphological Sites (RIGS). Natural England does not hold comprehensive information on these sites. We therefore advise that the appropriate local biological record centres, nature conservation organisations, Local Planning Authority and local RIGS group should be contacted with respect to this matter.

### **2.5. Biodiversity Action Plan Habitats and Species**

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed in the UK Biodiversity Action Plan (BAP). These Priority Habitats and Species are listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, recently [published](#) under the requirements of S14 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication '[Guidance for Local Authorities on Implementing the Biodiversity Duty](#)'.

Government Circular 06/2005 states that BAP species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of BAP habitat for the area under consideration.

## **3. Landscape, Access and Recreation**

### **3.1. Landscape and Visual Impacts**

The consideration of landscape impacts should reflect the approach set out in the *Guidelines for Landscape and Visual Impact Assessment* (Landscape Institute and the Institute of Environmental Assessment and Management, 2013, 3rd edition), the *Landscape Character Assessment Guidance for England and Scotland* (Scottish Natural Heritage and The Countryside Agency, 2002) and good



practice. The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England would expect the cumulative impact assessment to include those proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

### **3.2. Access and Recreation**

The ES should include a thorough assessment of the development's effects upon public rights of way and access to the countryside and its enjoyment through recreation. With this in mind and in addition to consideration of public rights of way, the landscape and visual effects on Open Access land, whether direct or indirect, should be included in the ES.

Natural England would also expect to see consideration of opportunities for improved or new public access provision on the site, to include linking existing public rights of way and/or providing new circular routes and interpretation. We also recommend reference to relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

## **4. Land use and soils**

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 and 171 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the valuing of the ecosystem services they provide as a natural resource, also in line with paragraph 170 of the NPPF.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The Natural Environment White Paper (NEWP) '*The Natural Choice: securing the value of nature*' (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils and the protection of BMV agricultural land.

Development of buildings and infrastructure prevents alternative uses for those soils that are permanently covered, and also often results in degradation of soils around the development as result of construction activities. This affects their functionality as wildlife habitat, and reduces their ability to support landscape works and green infrastructure. Sealing and compaction can also contribute to increased surface run-off, ponding of water and localised erosion, flooding and pollution.

Defra published a Construction [Code of Practice for the sustainable use of soils on construction sites](#) (2009). The purpose of the Code of Practice is to provide a practical guide to assist anyone involved in the construction industry to protect the soil resources with which they work.

As identified in the NPPF new sites or extensions to new sites for Peat extraction should not be granted permission by Local Planning Authorities or proposed in development plans.

General advice on the agricultural aspects of site working and reclamation can be found in the Defra [Guidance for successful reclamation of mineral and waste sites](#).

## **5. Air Quality**

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra



2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System ([www.apis.ac.uk](http://www.apis.ac.uk)). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

## **6. Climate Change Adaptation**

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment "by establishing coherent ecological networks that are more resilient to current and future pressures" ([NPPF](#) Paras 170 and 174), which should be demonstrated through the ES.



creating a better place



David Fowler  
London Borough of Camden  
Development Control  
Town Hall Extension Argyle Street  
London  
WC1H 8EQ

**Our ref:** NE/2021/133368/01-L01  
**Your ref:** 2021/2770/P  
**Date:** 10 June 2021

Dear David,

**Request for scoping opinion under Paragraph 4, Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving delivering a significant number of homes to help meet the current housing shortfall in LBC as well as new commercial uses that will create local jobs.**

**The O2 Centre, 255 Finchley Road, London, NW3 6LU.**

Thank you for consulting us on the revisions for this full EIA application for the proposed redevelopment of the O2 Centre. Given the location and the lack of environmental constraints within our current remit, we have no comments to make on this application.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

**George Lloyd**  
**Planning Advisor**



End







Historic England

David Fowler  
London Borough of Camden  
Development Management  
Regeneration and Planning  
Town Hall  
Judd Street  
London  
WC1H 9JE

Our ref: PL00750803

14 June 2021

Dear David Fowler,

**Consultation on application for Environmental Impact Assessment - Scoping Opinion**

**The O2 Centre 255 Finchley Road London NW3 6LU  
Application No 2021/2770/P**

Thank you for contacting us on 8 June 2021 seeking our observations on an Environmental Impact Assessment Scoping Opinion Request made under Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 to your authority relating to the above site.

We have reviewed the Scoping Opinion submission available on your website. Whilst we do not have any observations to make in relation to the Scoping Opinion submission, we can confirm that Historic England would be a statutory consultee on any resulting planning application. We may provide comments once we have been consulted on the full application.

If you have questions regarding any of the above, please do contact me.

Yours sincerely,

Kate Tatlow  
Business Officer  
E-mail: [kate.tatlow@historicengland.org.uk](mailto:kate.tatlow@historicengland.org.uk)



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)





**From:**

**Sent:** 29 June 2021 08:17

**To:** Planning

**Subject:** Scoping Comment for 2021/2770/P O2 Centre Finchley Road site

Good Morning,

Thank you for allowing me to comment on the proposed development of the O2 centre Finchley Road. There has been one meeting between the architects and design out crime from a security needs point of view. Early plans were shown and raised issues discussed.

With no real details on the design and layout at this application my comments will be general to the area, as befits a scoping opinion. Should permission be granted for this development, I would ask for buildings to obtain Secured by Design certification via early engagement, for the following reasons.

### **Crime Trends**

The proposed location of the development has the site sandwiched between railway lines as well as the A41 and B510. The site is large and from the outset could have issues with permeability and opportunistic crime. Both crime and antisocial behaviour are key considerations for this proposal as illustrated in the crime figures obtained from the police.uk website. This area comes under the policing ward of West Hampstead. Antisocial behaviour, violence and sexual offences, vehicle crime and public order were the top reported issues for the month of May 2021.

Top reported crimes	
Most commonly reported crimes during May 2021	
Anti-social behaviour	64
Violence and sexual offences	35
Vehicle crime	29
Public order	11
<a href="#">Get crime prevention advice</a>	



*The graphic above is for the most commonly reported crimes for West Hampstead ward. The figures have been taken from the Police UK website. The theme of the crimes are consistent on a month by month basis going back to 2019.*

#### Crime and ASB as material considerations for this site:

The scoping report makes several references to potential receptors which may be impacted by the proposed development and may need to be considered as part of the assessment. Two of the receptors are directly relevant to crime and disorder: Socio-economics and Health (pages 91 and 23). Crime and disorder are relevant considerations and need to be addressed. In socio-economic terms, the current crime trends in this area can have a negative impact upon the quality of life for both residents and businesses and could continue to do so for future residents and workers on this proposed site. I could not find a Health Impact Assessment (HIA) attached to this application. A safe development with low rates of crime and ASB will also have a healthier and happier community which will be less worried about crime and the fear of crime and will not be exposed to its side effects.

#### Initial concerns from the site:

There are several concerns for this proposed application. Access onto the site is of note. The current main access route is A41 Finchley Road, with secondary access via B150 from Blackburn Road. There is also pedestrian access from B150 via Billy Fury Way. Permeability in the form of footpaths needs to be considered carefully as 'leaky' developments (with secluded footpaths) can be a breeding ground for anti-social behaviour and crime. A multi-use common access route is preferred where there is vehicular movement, pedestrian traffic and cycle lanes. This enables a good level of vehicle use and footfall boosting the natural surveillance along key routes into the site. There should be no separate footpaths as these are often poorly overlooked and can be flash points for street crime including robbery type offences as well as sexual assault and other violent crime. If light industrial mixed use will occupy ground floor space with residential units above this should be considered carefully, as after a certain time (1700/1800 hours) there will be much reduced legitimate activity around these ground floor areas. This will reduce the footfall and natural surveillance and produce an environment where groups could gather, the result of which could be an increase in ASB. With groups loitering and associated rowdy behaviour, this will increase the fear of crime for the residents - some of whom may be reluctant to venture out after a certain time.

For blocks of residential units access control and compartmentalisation will be key to mitigating the risk of anti-social behaviour and acquisitive/opportunistic crime. Drugs are also a key issue for the borough of Camden and the development must not become a kindly habitat for gangs to enter and take control.

There is already a large night time economy for the borough of Camden and this could overspill into the new development. This along with a proposed licensed premises on the initial plans viewed at an earlier meeting with the architects could have a detrimental effect for the businesses and residents on the site.

Permeability will be a key factor as there is already a burglary and opportunistic theft trend for the area. Landscaping will also be important. Lines of sight, lack of concealment opportunities, reduced opportunities for group seating/gathering.

The development may wish to be car free; such proposals may be difficult to manage in reality, as residents and workers may resort to parking in nearby roads thereby increasing traffic pressure in the surrounding area. Should the development seek to include car parking,



careful consideration will be needed about appropriate parking areas. Open under crofts and insecure underground car parks can become plagued with crime and ASB, especially in areas with an active drug scene.

#### Similar developments within Camden:

Referenced on p19 and p20 of the report are numerous developments with applications similar to this, such as the 156 West End Lane, Abbey Road, The Avenue and Liddell Road. All have benefited from the advice of Met Police design out crime officers. The proposed site should be no different and should be conditioned to achieve SBD certification.

**I therefore propose that crime and disorder are material considerations for this site as described within the scoping report. These concerns can be allayed by the council agreeing to a condition for the development to achieve Secured by Design certification for all phases prior to occupation including residential, commercial and educational areas, to be maintained in line with SBD certification thereafter. This will require ongoing engagement at an early stage of each phase between the designing out crime officer and the development team.**

The NPPF and Camden's own local guidance can support this proposal:  
Section 91 of the NPPF states:

*Planning policies and decisions should aim to achieve healthy, inclusive and safe places which..*

*b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;.....”*

Section 127 of the NPPF further adds:

*Planning policies and decisions should aim to achieve healthy, inclusive and safe places which..*

*b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;.....”*

Taken from the Camden Supplementary Guide to Design (January 2021 revision)

- The Council requires that developments demonstrate that they have been designed to contribute to community safety and security.
- Security features must be fully considered and incorporated at an early stage in the design process.
- Designing-against crime features, safe access and security measures must complement other design considerations and be considered as part of a holistic approach to designing and maintaining safer environments for all.
- Better designed environments support safer and healthier communities.
- Consideration will be given to the impact of measures on the surrounding area to ensure that there is not displacement of activity into surrounding neighbourhoods.
- Safer environments support healthier communities.

In accordance with Local Plan Policy C5 Safety and Security, the Council will require applicants to demonstrate that all impacts of their proposal on crime and community safety



have been considered and addressed. Applicants should be able to demonstrate that they have consulted Met Police Designing Out Crime Officer (details of which can be found at [www.securedbydesign.com](http://www.securedbydesign.com)) and that proposals take into account the advice given and achieve Secured by Design certification, where appropriate.

### **Policy C5 Safety and security (From the Camden Local Plan)**

*The Council will aim to make Camden a safer place. We will:*

- (a) work with our partners including the Camden Community Safety Partnership to tackle crime, fear of crime and antisocial behaviour;*
- (b) Require developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime, such as Holborn and Covent Garden, Camden Town with Primrose Hill and Bloomsbury;*
- (c) Require appropriate security and community safety measures in buildings, spaces and the transport system;*
- (d) Promote safer streets and public areas;*
- (e) Address the cumulative impact of food, drink and entertainment uses, particularly in Camden Town, Central London and other centres and ensure Camden's businesses and organisations providing food, drink and entertainment uses take responsibility for reducing the opportunities for crime through effective management and design; and*
- (f) Promote the development of pedestrian friendly spaces.*

*We strongly encourage security features to be incorporated into a scheme from the beginning of the design process and complement other key design considerations. Internal security measures are preferred. Further information on designing safer environments is set out in our supplementary planning document Camden Planning Guidance on design.*

*It is important to take a proactive approach at an early stage to reduce risks and opportunities for crime and ASB to occur, rather than relying on reactive measures such as CCTV, which should only be used as part of a package of measures to reduce crime. Incorporating designing out crime features into a development should complement other key design considerations and high quality architecture and design should still be achieved. Considering good design early in the design process will lead to a better quality development overall.*

*The design of streets, public areas and the spaces between buildings needs to be accessible, safe and uncluttered. Careful consideration needs to be given to the design and location of any street furniture or equipment in order to ensure that they do not obscure public views or create spaces that would encourage antisocial behaviour. The use of the site and layout should also be carefully considered as these can also have a major impact on community safety.*

*From the Camden local plan;*

*“ Camden's food, drink and licensed entertainment premises contribute to the attractiveness and vibrancy of the borough but, where there is a concentration of late night activity, there can also be problems such as noise and disturbance, littering, antisocial behaviour, crime and violence. The cumulative impact of these uses will therefore be assessed in line with our town centre policies, particularly Policy TC4 Town centre uses and Policy A1 Managing the impact of development. The Council will also take into consideration any concerns raised from stakeholders within adjoining areas beyond Camden's boundaries. Alcohol related*



*crime and late night disorder have been identified as significant issues, particularly within Camden Town and the Seven Dials area of Central London. Camden's Statement of Licensing Policy sets out the Council's approach to licensing and special licensing policies apply to these areas."*

Kind regards

Aran



**Police Constable Aran Johnston**  
**Design Out Crime Officer**  
**Continuous Policing Improvement Command (CPIC)**  
5 The Oaks, Ruislip, Middlesex, HA4 7LF  
w: [www.met.police.uk](http://www.met.police.uk)  
External : 0208 733 3703

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**ENVIRONMENTAL HEALTH  
SUPPORTING COMMUNITIES**

<b>To:</b>	
<b>From:</b>	Paul Adams LBC Contaminated Land Team
<b>Date:</b>	23.06.2021
<b>Address:</b>	The O2 Centre, 255 Finchley Road, London, NW3 6LU
<b>Proposal:</b>	New proposed housing and commercial development → request for comment on EIA Scoping Report
<b>Reference:</b>	2021/2770/P
<b>Key Points:</b>	Broad agreement with proposals subject to points raised

**ENVIRONMENTAL HEALTH OBSERVATIONS**

**PART 1 - Introduction**

The following documents were reviewed in preparation for the comments below:

Introduction & Section 6.5 'Ground Conditions and Land Contamination' of:  
*Scoping Report for Environmental Impact Assessment - O2 Finchley Road.*  
*Plowman & Craven Ref: 43284, dated May 2021.*

The proposal comprises a residential-led redevelopment of a c. 5.7 ha parcel of land encompassing the O2 centre, Homebase, car park and warehousing units currently occupied by car dealerships and a builder's depot. Up to 2,000 homes and 200,000 square feet of non-residential floorspace is proposed. Due to the scale of the redevelopment, the project will require an Environmental Impact Assessment (EIA).

The site is located in Finchley and bounded by Blackburn Road to the north and south, by Finchley Road to the east and by Billy Fury Way to the west.

Section 6.5 indicates that the ground conditions assessment will be produced by Pell Frischman. The baseline conditions presented are based on a Phase I Desk Study produced by Pell Frischman in March 2021 (report not provided for review at this stage).

The geology is reportedly mapped as being underlain by London Clay of significant thickness with no overlying superficial deposits (but an unknown thickness of overlying made ground). There are no surface water features within 1 km, no groundwater abstractions within 500m and the site is not located within a groundwater source protection zone.



Historical land uses with the potential to have caused contamination reportedly comprised extensive areas of railway sidings and cuttings, coal depots, car parks, a refuse transfer station and possible landfill, industrial buildings, depots, a builder's yard, a printer's and a laundry.

Current land uses with the potential to have caused contamination reportedly comprise plant rooms containing fuel storage tanks the O2 Centre, car parks and vehicle maintenance businesses (the latter with associated above ground storage tanks and drums). Interceptors were also reportedly observed during a site walkover.

The authors of the Desk Study reportedly concluded a moderate land contamination risk rating to the proposed redevelopment.

The intended structure of the EIA Chapter will reportedly comprise the findings of the Desk Study and the factual findings of the intrusive site investigation, a GRQA for human health and a land gas risk assessment. There will be no ecological or environmentally sensitive land use assessment as the Desk Study has not identified any such receptors. A controlled waters GQRA will not be included due to the low sensitivity of the site in this regard. Assessment of potential impacts at construction and operational phases will be undertaken along with mitigation measures which may require further assessment or remediation.

## **PART 2 – Comments**

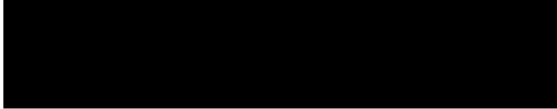
We are in broad agreement with the reported findings of the Desk Study and the Conceptual Site Model. The historical land use findings are broadly consistent with an outline review of records held by LBC. We are also in broad agreement with the proposed approach for producing the Ground Conditions EIA Chapter subject to the following considerations:

- (Subject to confirmation via a detailed desk-based UXO risk assessment) Due to evidence of historical bomb damage on site, UXO supervision will be required during all intrusive site investigation works;
- It will be of the utmost importance to prove / disprove the presence of the landfill within the boundary of the former Waste Transfer Station;
- Assessment of waters should not be completely discounted. Whilst we agree that the risk to controlled waters is low; perched water could be anticipated to have accumulated on top of the London Clay. This could cause lateral migration of contamination present in the made ground (subject to the topography of the site / top of the London Clay). Heavily impacted perched water could also potentially present a vapour intrusion risk. Based on the former land uses; fairly significant, localised contamination of the made ground cannot be discounted. It will be important to prove the depth to the top of the London Clay at regular intervals across the site;
- Supplementary intrusive site investigations (targeting both existing and historical previous land uses with the potential to cause contamination) will likely be required post demolition of buildings.



Please contact the undersigned should you require any further information.

Sincerely,



Dr Paul Adams BSc PhD MEnvSc CSci  
Acting Contaminated Land Officer (CLO)  
London Borough of Camden



## **O2 Finchley Road: Scoping Report for Environmental Impact Assessment**

Thank you for the opportunity to comment on the Environmental Impact Assessment (EIA) scoping report. We note that proposed development involves up to 2,000 residential units, approximately 200,000 sq ft of non-residential floorspace and will be phased over approximately 15 years.

The CCG were notified of the scoping opinion on 11 June 2021. We are involved in wider pre-application discussions with the applicant.

We note under paragraph 3.10 'EIA Consultation' that further consultation on the EIA will be undertaken with both statutory and non-statutory consultees and the CCG would welcome this.

### **3.6.1 Methodology**

The assessment will consider effects at the site preparation, construction and operational stages. It should also be acknowledged that health and wellbeing impacts will also occur following occupation of the development as the demand for healthcare services grows and buildings, spaces and streets are used and managed. It should also be noted that for phased developments, new residents of completed phases will also be affected by ongoing construction of later phases.

### **3.6.2 Assessment of Cumulative Effects**

The EIA Regulations require the likely significant cumulative environmental effects of a development to be considered. The schemes to be considered will be those located within a 1km radius of the site. The report refers to potential cumulative effects. We suggest that these effects include community infrastructure, including healthcare as catchments will extend beyond the site. It could also identify the need for mitigation and developer contributions, including the use of Community Infrastructure Levy receipts.

## **6.11 Socio-economics**

### **6.11.2 Baseline Conditions and 6.11.3 Potential Effects**

We note that the local area will be defined as West Hampstead ward and that population projections and estimates and the Indices of Multiple Deprivation (2019) will be used to establish the socio-economic baseline. We assume that the standalone health impact assessment will include a detailed health profile.

The socio-economic assessment will identify local community infrastructure and establish the capacity baseline and will estimate the demand for community infrastructure arising from the new residential population. It is unclear why only primary healthcare (GP surgeries) are included. The baseline assessment should also include community, mental health and hospital services and take into account changing models of healthcare, including the development of



primary care networks and Camden and Islington NHS Foundation Trusts plans to transform mental health services and establish community hubs.

#### 6.11.3 Potential Effects - Non-Significant Effects

We note that a separate 'human health' chapter will not be included in the EIA, but a separate Health Impact Assessment (HIA) will be prepared and submitted with the planning application. The HIA will review the health impacts arising from the EIA and from separate assessments, such as the transport and air quality assessments.

The scope of the HIA will be based on the principles established within the Healthy Urban Development Unit (HUDU) guidance for HIA. We assume that this refers to the NHS London Healthy Urban Development's Rapid Health Impact Assessment Tool (October 2019). We would refer you to the Camden Planning Guidance 'Planning for health and wellbeing' (January 2021), particularly paragraph 1.47 which expects a more comprehensive HIA for larger developments of more than 100 dwellings.

This could include a detailed assessment of health needs and issues, focusing on vulnerable and sensitive groups, could bring together the issues and priorities arising from community engagement and include a mitigation and monitoring schedule which address construction and operational impacts and measures. Whilst the assessment would focus on identifying and mitigating negative impacts, it is important that the HIA addresses positive impacts and maximises benefits from the proposed development. This could involve exceeding minimum standards and demonstrating how the design of the scheme would maximise health gains.

Given that the development will be phased over a period of approximately 15 years we suggest that consideration is given to a longer-term study of the impact on health and wellbeing, focusing on post-occupation impacts.

We suggest that advice is sought from the Camden and Islington Public Health team.

#### 6.11.4 Scope and Assessment Methodology

The report refers to the GLA's Population Yield Calculator (2019) to estimate the population living within the proposed development. The calculator is designed for education purposes to estimate the child yield from a development. It does not include older age bands which are important to healthcare planning, but also useful to identify an older population to inform the design of buildings and spaces.

We suggest that the GLA population yield calculator figures are compared against the GLA housing led ward projection and the population yield outputs from the HUDU Planning Contributions Tool.

The report does not identify how the healthcare baseline and capacity will be assessed. We would welcome the opportunity to discuss the use of NHS data and information from providers



and agree the data sources and assumptions to be used. In particular, the CCG are consulting local GP practices as they are experiencing significant patient list size growth and capacity issues.

#### 6.11.5 Likely Mitigation

We would welcome the opportunity to discuss necessary mitigation to address the gap between available capacity and increased demand for infrastructure. This should include the use of HUDU Planning Contributions Tool to calculate healthcare activity, floorspace and cost impacts.