



West Kentish Town Estate EIA Scoping Report

Prepared for:
London Borough of Camden Community Investment Programme

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INTRODUCTION

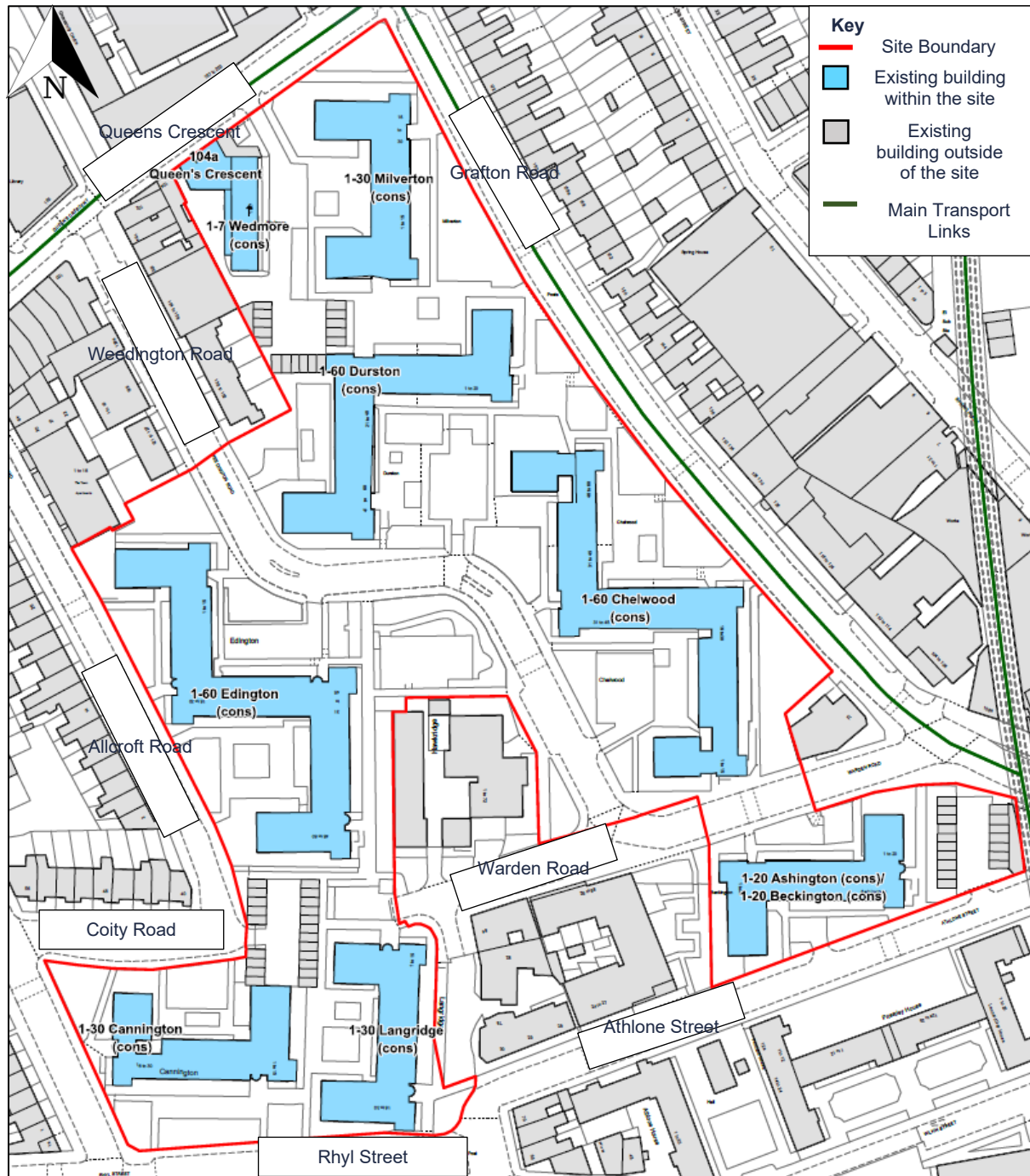
1. London Borough of Camden Community Investment Programme (hereinafter referred to as the 'Applicant') is seeking hybrid planning permission for the proposed redevelopment of the West Kentish Town Estate, located within the administrative boundary of the London Borough of Camden (LBC) (centred on National Grid Reference TQ 28415 84953) (hereinafter referred to as the 'site').
2. The site covers a total area of approximately 3.5 hectares (ha) and is bound by:
 - Queens Crescent road, a small number of retail and commercial uses, Baitul Aman Mosque, residential properties and, further afield, railway lines to the north;
 - Grafton Road to the east along with commercial and residential land uses and railway lines servicing the London Underground;
 - Warden Road, Athlone Street and the east end of Rhyl Street to the south which primarily contains residential land uses as well as Athlone Hall, Rhyl Primary School, Talacre Town Green and Talacre Community Sports Centre; and
 - Allcroft Road and Bassett Street to the west that largely run north-south are lined by terraced housing.
3. West Kentish Town Estate is occupied by residential properties associated with the existing estate with associated garages and hard standing for surface-level car parking, alongside open space / landscaped areas including mature trees, grass areas and shrubbery. The estate also includes both formal and informal play space areas including a basketball court. **7** illustrates the indicative red line planning application boundary and site location plan, respectively.
4. The nature and scale of the redevelopment of the estate is evolving however the planning application is seeking **hybrid permission** for the following (hereafter referred to as the 'Proposed Development'):
'Hybrid planning application with phases 1A and 1B submitted in detail with the remainder submitted in outline with all matters reserved for the redevelopment of the West Kentish Town to provide approximately 885 dwellings (Class C3) (with a mix of affordable and market housing) and ancillary commercial (Class E) uses in buildings ranging from 4 to 14 storeys in a variety of different housing typologies including flats and maisonettes alongside new routes, open space, play space, hard and soft landscaping and other associated works.'
5. Further information in regard to the Proposed Development is included within *The Proposed Development and Planning Application* section of this EIA Scoping Report.
6. The site is not allocated in the adopted Site Allocations Plan, but it does have an emerging allocation under the draft Camden Site Allocation Plan¹ under Policy IDS13 for a housing led mixed use development opportunity within the Gospel Oak and Haverstock Development Area, which offers significant regeneration benefits as well as improving the streetscape. The policy indicates that the site has an additional capacity to provide approximately 484 new homes, in addition to the replacement of the existing units on the site.
7. An Environmental Impact Assessment (EIA) will be required for the Proposed Development as it falls within Schedule 2, 10(b) (Infrastructure Projects – Urban Development Projects) of the EIA Regulations (as amended)² (hereafter referred to as the EIA Regulations). Due to the scale of the development and the nature of the site and surrounding area it is considered that there is the potential for significant environmental effects to arise, both beneficial and adverse. The Proposed Development is therefore

¹ <https://www.camden.gov.uk/documents/20142/145786127/Site+Allocations+2020+-+01+Introduction.pdf/29231b31-c3b8-7edf-daa0-6ff1ec5dd4fe?t=1581430524493>

² *The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended in 2018 and 2020)*

considered to constitute 'EIA development' under the EIA Regulations, and so an Environmental Statement (ES) will be prepared to accompany the planning application.

Figure 1 Red Line Planning Application Boundary (Indicative from June 2022 for EIA Scoping)



Use of Competent Experts

8. Trium Environmental Consulting LLP (Trium) has been commissioned by the Applicant to prepare an EIA Scoping Opinion Request for the redevelopment of the site in line with the requirements of the EIA Regulations and relevant EIA guidance. This includes submitting an EIA Scoping Report (this document) and request for an EIA scoping opinion to the LBC in accordance with Regulation 15 of the

EIA Regulations. This Scoping Report sets out the proposed scope of the EIA and the content and approach to preparing the ES that will be submitted to accompany the application for hybrid planning permission.

9. The EIA Regulations (Regulation 18(5)) require that in order to ensure the completeness and quality of the ES, ‘(a) the developer must ensure that the environmental statement is prepared by competent experts;’ and ‘(b) the environmental statement must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts.’ Trium consider that these requirements are equally important and relevant to the EIA scoping process in addition to the preparation of the ES. As such, in accordance with this requirement, the following statement is provided:

“Trium is an environmental consultancy specialising in urban regeneration and property development projects in the UK, with a specific focus in London. Trium’s Partners and Employees have extensive experience in managing the environmental issues and impacts surrounding large scale, high profile urban regeneration development projects. The Partners and Employees of Trium have, over the course of their careers to date (including with former employers), project directed, managed or contributed to over 400 EIAs within the retail, residential, leisure, commercial, cultural, infrastructure and industrial sectors.”

10. Information on Trium’s lead partner, project director and project manager and information for each technical sub-consultant will be appended to the ES within **ES Volume 3: Technical Appendices**. Details such as membership of professional bodies, academic qualifications and relevant technical experience will be presented.

Structure of the EIA Scoping Report

11. This Scoping Report is structured as follows and provides:
- A summary of the EIA purpose and process including EIA Scoping;
 - A description of the location of the site and the surrounding area’s environmental context;
 - An overview of the Proposed Development;
 - An outline of the planning context;
 - A description of the EIA methodology;
 - The approach to determining the significance of effects;
 - Confirmation of the proposed structure of the ES; and
 - The request for an EIA Scoping Opinion from the LBC.
12. This EIA Scoping Report is supported by the following Appendices:
- **Appendix A: Topic Sheets (SCOPED IN)** for the topics that are considered to potentially result in significant effects on the environment and which include an explanation of the proposed scope and assessment methodology that will be adopted to predict the magnitude of potential impacts and the resultant scale, nature, geographic extent and duration of potential effects, and the effect significance. The topics to be scoped in are presented below;
 - Air Quality;
 - Greenhouse Gases and Climate Change;
 - Noise and Vibration;
 - Socio-Economics

- Health³;
 - Heritage, Townscape and Visual Impact Assessment;
 - Daylight, Sunlight, Overshadowing and Solar Glare;
 - Wind Microclimate; and
 - Ecology and Biodiversity.
- **Appendix B: Topic Sheets (SCOPED OUT)** for the topics that are considered unlikely to result in significant effects on the environment, providing supporting evidence/ justification for these topics to be ‘scoped out’ of the EIA. The topics to be scoped out are presented below;
 - Archaeology (Buried Heritage);
 - Geo-Environmental;
 - Water Resources, Drainage and Flood Risk;
 - Light Pollution⁴;
 - Project Vulnerability⁵;
 - Transport and Access; and
 - Waste and Materials.
 - **Appendix C: Archaeological Desk Based Assessment (Archaeological Assessment⁶)**
 - **Appendix D: Preliminary Ecological Appraisal (Biodiversity Survey and Report⁷); and**
 - **Appendix E: Phase I Geotechnical and Geo-environmental Desk Study Report (Contaminated Land Assessment⁸)**

³ A standalone ES chapter is not to be produced as health is considered within the EIA. A Health Impact Assessment will be prepared as a standalone report and appended to the ES.

⁴ Note the scoping out rationale is included within the Daylight, Sunlight, Overshadowing and Solar Glare Topic Sheet in Appendix 1.

⁵ A Project Vulnerability standalone chapter will not form part of the ES. It is considered that significant effects would not be likely. Furthermore, other planning reports which will be submitted alongside the planning application (i.e. Flood Risk Assessment, Phase 1 Geo-environmental and Geotechnical Desk Study, the geo-environmental and geo-technical intrusive study, Fire Statement and the Crime Impact Assessment) will identify any potential risk associated with the Proposed Development and propose suitable mitigation to control these risks.

⁶ Defined as ‘Archaeological Assessment’ under LBC’s Validation Checklist

⁷ Defined as ‘Biodiversity Survey and Report’ under LBC’s validation Checklist

⁸ Defined as ‘Contaminated Land Assessment’ under LBC’s validation checklist.

EIA AND THE SCOPING PROCESS

EIA Purpose and Process

13. EIA is a process carried out which examines available environmental information to ensure that the likely significant environmental effects of certain projects are identified and assessed before a decision is taken on whether a project is granted planning permission. This means environmental issues can be identified at an early stage and projects can then be designed to avoid or to minimise significant environmental effects, and appropriate mitigation and monitoring can be put in place.
14. Regulation 4 of the EIA Regulations sets out the EIA process. Specifically, Regulation 4(2) states that *'the EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the Proposed Development on the following factors:*
 - *(a) population and human health;*
 - *(b) biodiversity;*
 - *(c) land, soil, water, air and climate;*
 - *(d) material assets, cultural heritage and the landscape;*
 - *(e) the interaction between the factors referred to in sub-paragraphs (a) to (d).'*
15. The potential for likely significant effects on the aforementioned factors, during both the demolition and construction works associated with the Proposed Development and once the Proposed Development is complete and operational, is considered within the following relevant environmental topics addressed within this Scoping Report:
 - Air Quality;
 - Noise and Vibration;
 - Traffic and Transport;
 - Archaeology (Buried Heritage);
 - Ecology and Biodiversity;
 - Water Resources and Flood Risk; and
 - Geoenvironmental (Ground Conditions, Groundwater and Soils);
 - Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare;
 - Heritage, Townscape and Visual Impact;
 - Wind Microclimate.
 - Health;
 - Socio Economics;
 - Climate Change;
 - Project Vulnerability; and
 - Waste and Materials;

16. The method behind the EIA process generally⁹ takes into account the existing conditions of the area into which the development is being introduced (**the baseline**) and makes reasonable predictions of the likely change (**the impact** – in terms of magnitude) that may occur, during both its demolition and construction and when the development is completed and operating as proposed. The predicted impact is considered in terms of key environmental and social aspects (**receptor/ resource**) found within the surrounding area, and based on their sensitivity to change, the resulting change experienced by the receptor/ resource (**the effect**) is then determined. Any mitigation measures required in order to reduce or eliminate adverse effects are then considered and assessed, with the resulting residual effect being determined as significant or not. The likely significant effects are then reported (within an **Environmental Statement (ES)**) for consideration by the relevant planning authority, when considering whether to grant planning permission for a development.

The Scoping Process

17. EIA Scoping forms one of the first stages of the EIA process. Requesting an EIA Scoping Opinion from a local planning authority, under Regulation 15 of the EIA Regulations, involves the preparation of a Scoping Report and its submission to the local planning authority is part of a request for their opinion on the content or 'scope' and approach to the EIA.
18. The purpose of scoping is to identify:
- the important environmental issues and topics for consideration in the EIA;
 - the baseline conditions and assessment methodology to be used for assessment;
 - any potentially sensitive receptors that may be affected by the development being proposed;
 - the appropriate space boundaries of the EIA;
 - the site boundary and surrounding environmental context;
 - the committed developments that need to be considered in the assessment of cumulative effects;
 - the information necessary for decision-making; and
 - the potential significant effects which are likely to result from the development both during its demolition and construction and operation.
19. In accordance with the requirements of the Town and Country Planning (Development Management Procedure) Order 2015 (article 18, Schedule 4), this Scoping Report will need to be issued by the LBC to the statutory consultees that are considered to have an interest in the EIA of the Proposed Development and should be consulted as part of the EIA Scoping process. It is expected that the LBC will also issue the Scoping Report to non-statutory and key, local stakeholders and interest groups who are deemed to similarly have an interest in the EIA of the Proposed Development.
20. The process of consultation is a key requirement of the EIA process, and the views of statutory consultees and other stakeholders help to identify specific issues, as well as identifying additional information in their possession, or of which they have knowledge, which may be of assistance in progressing the EIA.
21. The ES will append the Scoping Opinion and include a summary of any other consultation undertaken as part of the EIA process.

⁹ There may be exceptions to the general approach described. Where there are exceptions, this will be clearly described within the relevant methodology section of each ES Chapter, outlining both the departure from the general EIA methodology and the description of the alternative approach. This is discussed further within 'EIA Process and Methodology' section of this Scoping Report.

SITE DESCRIPTION AND ENVIRONMENTAL CONTEXT

Site Description

22. The site currently comprises residential properties associated with the West Kentish Town Estate. These residential properties are occupied by 263 tenanted units, with a further 53 leaseholder units, in three to four storey buildings. The site comprises associated hard standing for surface-level car parking, garages, alongside open space areas including mature trees, grass areas and shrubbery. The site also includes both formal and informal play space areas including a basketball court.
23. Primary vehicle access to the site is currently provided by Weedington Road off Queens Crescent, Grafton Road, Warden Road and Athlone Street. These road links are all within a Controlled Parking Zone (CPZ). The surrounding streets are also subject to CPZ restrictions.
24. The site is well connected to public transport links including Kentish Town West overground and underground stations approximately 200m to the south east, Gospel Oak overground station approximately 500m to the north and Chalk Farm underground station (Northern Line) approximately 550m to the south west. It is also connected to various green spaces in Camden, including Talacre Town Green to the south, Hampstead Heath to the north and Lismore Circus (open space) between them. **Figure 2** to **Figure 4** illustrates the existing site and surrounds and the surrounding residential context.

Figure 2 Aerial Photo of the Site (South East)



Figure 3 Weedington Road (North)



Figure 4 Allcroft Road (West)



Environmental Context

26. The key environmental features and designations within the site and surrounding area are listed in **Table 1** below and shown in **Figure 5**.

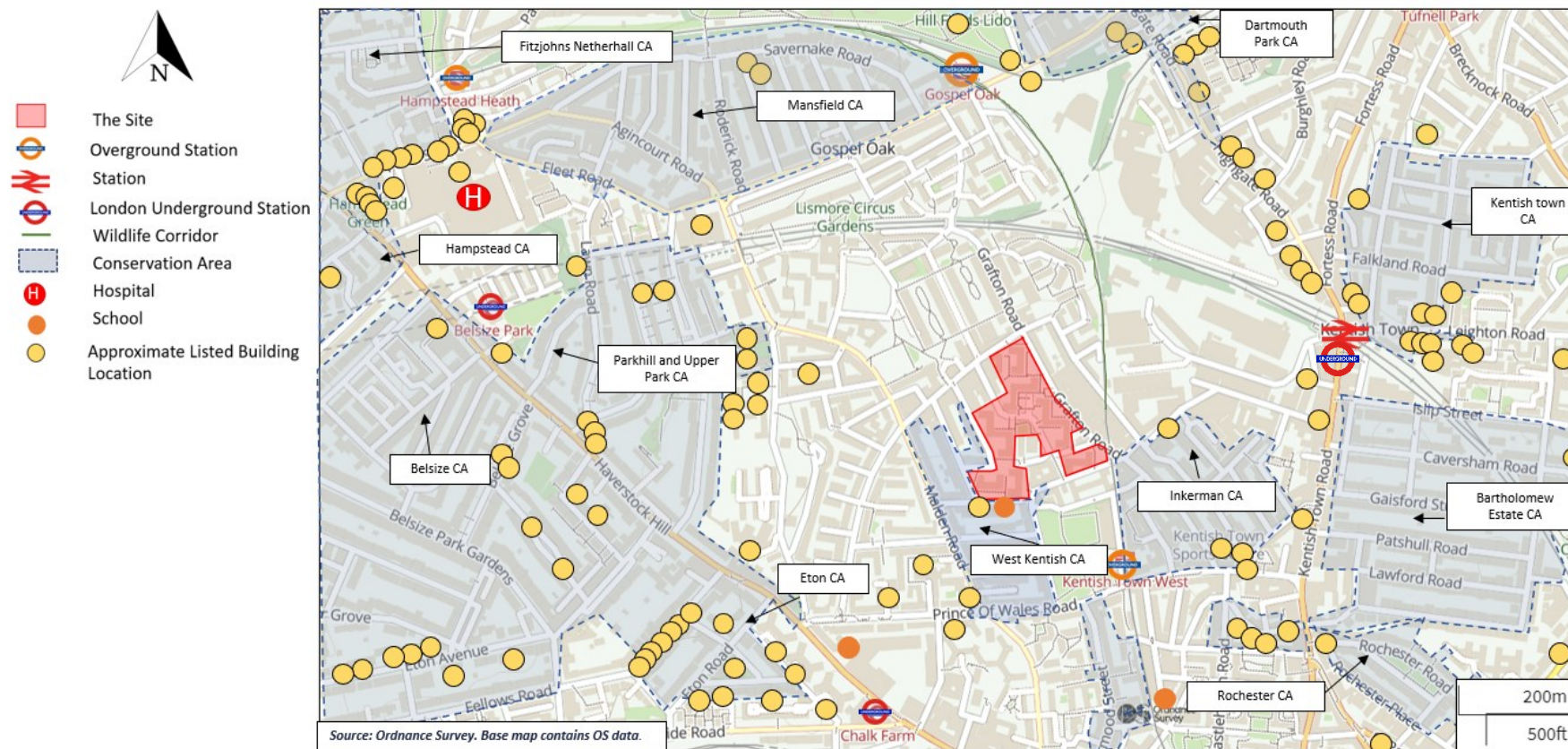
Table 1 Key Environmental Features and Designations

Environmental Topic	Key features and designations
Socio-Economics	<ul style="list-style-type: none"> The closest primary schools are the Rhyl Community Primary School (located approximately 17m to the south), St Patrick's Catholic Primary School (located approximately 325m to the east) and Holy Trinity and Saint Silas CofE Primary School (located approximately 50m to the south east). The nearest secondary schools are the Haverstock School (located approximately 378m to the south west), The William Ellis School (located approximately 900m north) and The Camden School for Girls and Parliament Hill School (located approximately 920m south east). The closest GPs are the Queens Crescent Practice, located (approximately 100m) and The Prince of Wales Group Surgery (approximately 200m). Both are accepting new patients. All other GP's within a mile from the site are also accepting new patients. The nearest dental practice is the Kentish Town Dental Centre located approximately 100m from the site, however, this dental practice is not currently taking any new NHS patients. Malden Dental Practice is located approximately 120m south west from the site. The dentist has not provided data as to whether they are currently registering new patients. The closest area of open space is Talacre Town Green located approximately 200m to the south. The nearest hospital is the Royal Free Hospital, located approximately 1km north west.
Traffic and Transport	<ul style="list-style-type: none"> Primary vehicular access is achieved via Weedington Road, which directly bisects the site. Access to the site can also be achieved via Warden Road and Queens Crescent. The roads within and surrounding the site (namely Weedington Road, Warden Road, Grafton Road, Allcroft Road, Rhyl Street, Athlone Street, Coity Road and Bassett Street) all lie within a CPZ. The surrounding road network is also subject to CPZ restrictions. Pedestrian access points are located along Grafton Road, Warden Road, Allcroft Road and Queens Crescent. The Public Transport Accessibility Level (PTAL) rating ranges from 1b (very poor) on the far western section of the site, to 4 (good) on the south eastern section of the site with the closest London Overground station at Kentish Town West being located approximately 200m south. The nearest bus stop is located along Malden Road to the east. Two buses stop along this road, including numbers 24 and 46, which provide access from Paddington Station to St Bartholomew's Hospital and from Grosvenor Road to Royal Free Hospital. The nearest cycleway is the C6 cycleway. Cycleway C6 runs from Kentish Town to Elephant and Castle.
Air Quality	<ul style="list-style-type: none"> The site is located within the Camden 'Air Quality Management Area' (AQMA) for nitrogen dioxide (NO₂) and particulate matter (PM₁₀). The whole borough was declared an AQMA in 2002. LBC undertakes air quality monitoring at a number of locations across the borough. The closest monitoring location to the site is 'CD1' which is located approximately 1.7km to the west. The nearest air quality monitoring stations¹⁰ to the site will be used to provide the baseline scenario for the air quality assessment.
Noise and Vibration	<ul style="list-style-type: none"> Primary sources of background noise to the site are likely to occur as a result of road traffic from the Queen Crescent, Grafton Road and Allcroft Road. There is also likely to be noise associated with rail movements on the railway tracks to the south east of the site.
Water Resources, Flood Risk and Drainage	<ul style="list-style-type: none"> The site is located within an area designated as 'Flood Zone 1' - land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding. Environment Agency (EA) information for the site indicates that the majority of the site is at a medium risk of surface water flooding with between a 1% and 3.3% chance of flooding each year.
Ecology	<ul style="list-style-type: none"> The site is not located within a 'sensitive area' (as defined in Part 1 of the EIA Regulations) and does not fall within the boundaries of any other statutory or non-statutory sites, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar Sites, Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Local

¹⁰ Refer to the 'Air Quality' topic sheet for the map illustrating the air quality monitoring stations around the site.

Environmental Topic	Key features and designations
	<p>Nature Reserves (LNR). It does lie within the SSSI Impact Risk Zone for the Hampstead Heath SSSI.</p> <ul style="list-style-type: none"> The nearest statutory site is the Belsize Wood Local Nature Reserve (LNR) located 0.8km to the north east. The Adelaide LNR is located 1km south west. There are 24 non-statutory designated SINC's within 2km of the site boundary, the closest of which are Cab104 Kentish Town City Farm (located approximately 206m north east of the site), Gospel Oak Woodyard (214m north east from the site) and Railway Embankment, Kentish Town Junction (located approximately 294m north east from the site). A Preliminary Ecological Appraisal was undertaken for the site. The walkover associated with the Preliminary Ecological Appraisal found that the site was considered to be general low value to wildlife. The existing trees across the site did not contain any features which would be considered to be suitable to support bat roosting and/or hibernation. A number of trees across the site did have bat boxes fitted however, the buildings were considered to have low suitability for roosting bats. None of the designated sites identified within the PEA were considered to have any direct connectivity to the estate.
Archaeology	<ul style="list-style-type: none"> There are no designated assets within the site boundary. There are no World Heritage Sites, Scheduled Monuments or Registered Battlefields with 500m of the site. There are two Archaeological Priority Areas (APA's) within 500m of the site: the Regents Canal and Rail Infrastructure APA, and the Kentish Town APA.
Heritage	<ul style="list-style-type: none"> The site is not located within a Conservation Area, however, lies adjacent to the West Kentish Town Conservation Area to the west. The Inkerman Conservation Area is also located beyond the London Overground Line to the southeast (approximately 15m south east from the site). The site does not contain any statutory or non-statutory listed buildings, or other designated assets. There are a number of Listed Buildings and Locally Listed Buildings within 500m, totalling 75 buildings or building clusters. These are typically Grade II or II* Listed; however, Church of St Martin is Grade I Listed, which is located approximately 240m north west; A number of other Conservation Areas (CA) are located within 1km of the site¹¹. <ul style="list-style-type: none"> Mansfield CA; Parkhill and Upper Park CA; Eton CA; Harmood Street CA; Bartholomew Estate CA; Dartmouth Park CA; Rochester CA; South Hill Park CA; Primrose Hill CA; Belsize Park CA Kelly Street CA; Regent's Canal CA. Although some areas of Belsize CA and the Fitzjohn's Netherhall and Hampstead CA's are marked on Figure 5, these lie beyond 1km from the site and have only been included for informative purposes only. There are no Registered Parks and Gardens or Scheduled Monuments within 500m of the site.
Visual	<ul style="list-style-type: none"> The site lies within a viewing corridor from Parliament Hill to Central London (London View Management Framework 2B).

¹¹ Not all conservation areas listed are shown on Figure 5.

Figure 5 Environmental Context Map¹²

¹² All locations are approximate. Some detail included on the map does not necessarily form part of the EIA Assessment. Refer to the individual topic sheets for potential receptors across each technical discipline.

THE PROPOSED DEVELOPMENT AND PLANNING APPLICATION

Overview of the Proposed Development

27. The Proposed Development is anticipated to comprise the demolition of the existing residential units on site and the construction of a residential led scheme, which is likely to include approximately 898 residential dwellings which will contain a mix of affordable and market housing. A small retail/ commercial provision as well as new open space, play space and associated works will also be provided as part of the Proposed Development.
28. These uses will be located in up to 13 buildings to range between 4 and 14 storeys in height (inclusive of necessary plant). Basements are currently proposed beneath Block D1 and potentially beneath Block B1, C1 and E2. The indicative maximum depth of these basements is approximately 4m below ground level¹³. The allocation of basements will be defined through further design study and development. At present, there is a small allocation for commercial / retail use proposed on the site facing Queen's Crescent.

Phasing Strategy

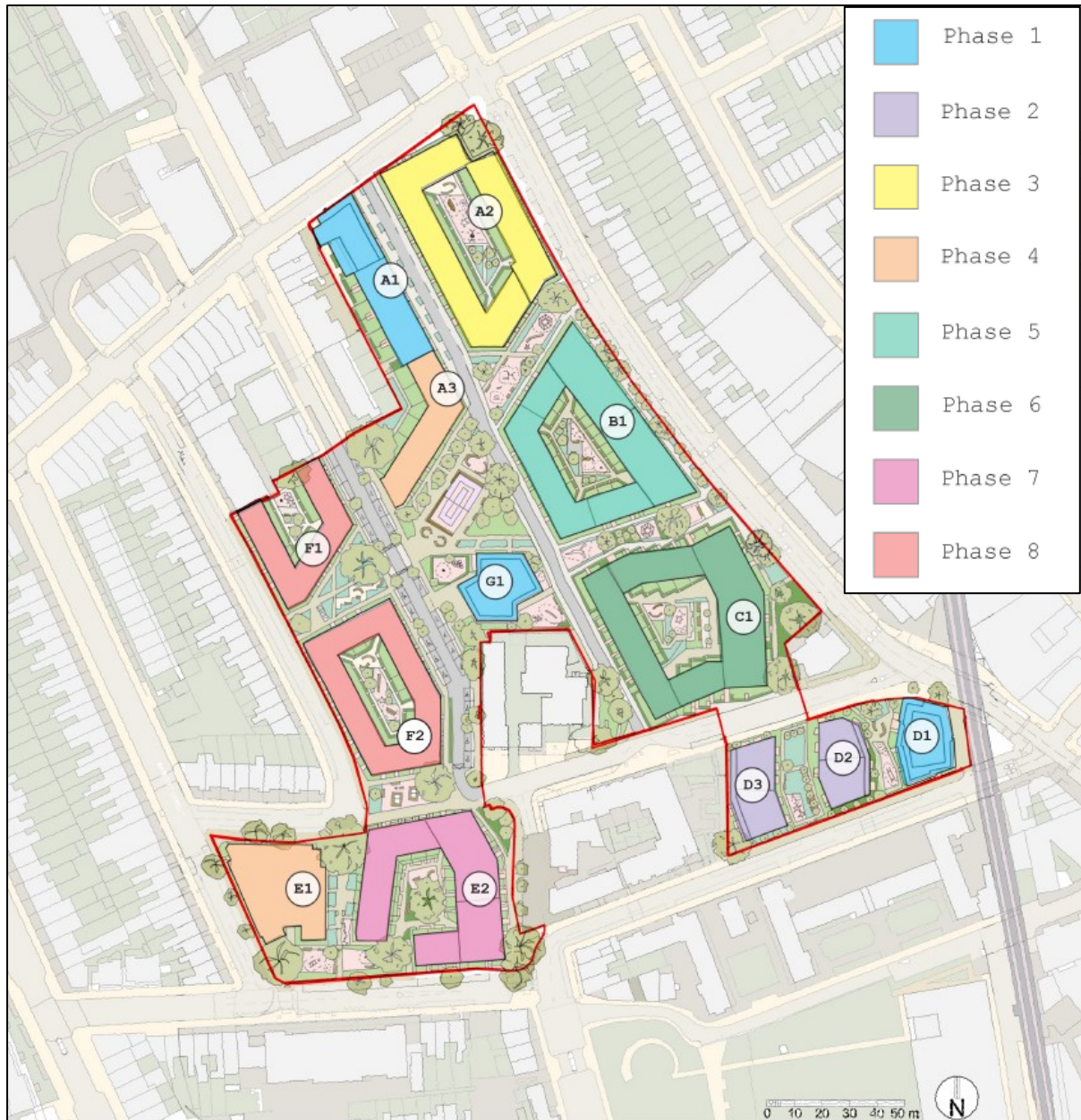
29. The Proposed Development will be delivered over a number of phases with Phase 1 (with the potential to split into Phase 1A and Phase 1B) comprising the detailed component and the remaining phases forming the outline component. Phase 1 will comprise the construction of Blocks A1, D1 and G1 and is anticipated to be delivered first by end of 2025. The remaining blocks will be delivered from Phase 2-8 accordingly.
30. The indicative phasing strategy for each block is shown in **Figure 6**. Existing residents would be decanted ahead of the demolition works. There may be a small proportion of residents temporarily rehomed (where required) prior to the construction of the new blocks as part of the Proposed Development. Further details on the decanting strategy will be provided within the ES and the wider planning application.
31. The car parking strategy for the Proposed Development is still under consultation with the relevant authorities. At this stage, all vehicular access is proposed via Allcroft Road, Grafton Road and Weedington Road. 53 private off-street car parking spaces and 60 private garages are provided for estate residents. Out of these facilities, only 23 out of the 53 off street car parking spaces and 13 out of 60 garages were surveyed to be used for car parking purposes in 2021¹⁴. As part of the proposals for the Proposed Development, existing garages and off-street car parking will be removed, and only existing residents will be issued with on-street permits for the Controlled Parking Zone (Zone CAL). It is important to note that the new on-street permits for existing residents will be lined to the tenant and not the actual residence. When those tenants moved away from the estate, their parking permit will be revoked and will not be issued to any new resident.
32. In addition, 31 existing on-street parking spaces will be temporarily removed as part of the highway works associated with the Proposed Development but will be re-provided. There will therefore be no change in on-street parking supply and based on parking surveys undertaken in 2021, there is sufficient capacity to accommodate resident vehicles displaced from the current private, off-street parking and garages. Finally, car parking permit rights for new residents will not be provided as part of the Proposed Development, unless they have a blue-badge requirement. On-street loading bays are proposed along Queens Crescent and on Warden Road.
33. Pedestrians/ cyclists will be able to access the Proposed Development from the bordering streets

¹³ This depth may differ across the site due to topography.

¹⁴ Please note that an updated parking survey for the West Kentish Town Estate is due to be undertaken imminently and therefore the details of the existing parking spaces and their usage may fluctuate between this scoping report and the submitted planning application documents.

(including Grafton Road, Allcroft Road, Weedington Road, Rhyl Street and Warden Road)

Figure 6 Indicative Phasing Strategy



34. The energy strategy to service the Proposed Development is evolving however is likely to be all electric, with a focus on sustainable / renewable energy consisting of air source heat pumps. The Proposed Development is not anticipated to connect into the local or existing district heat network.

PLANNING CONTEXT

Planning Policy Context

35. The ES (within **ES Volume 1, Chapter 2: EIA Methodology**), will define the relevant national, regional and local policy context. Specifically, the ES will list out the key relevant policy documents but will not discuss the policies within these in any detail.
36. Although relevant policies out of the key planning policy documents will, in some instances, inform the scope and the methodology of the technical assessments within the EIA, the Proposed Development's compliance with and performance against the relevant planning policies will be appraised within the

Planning Statement which will be a standalone document that is submitted in support of the planning application. It is not the purpose of the ES to appraise the Proposed Development against relevant national, regional and local planning policy standards/ targets.

37. Where planning policy informs the scope and the methodology of the technical assessments of the EIA, the policies will be presented in the ES (in the relevant technical topic chapters) and discussed as necessary. Any policy detail required to support the relevant impact assessment scope, methodology or assessment of effects, will either be provided within the technical topic chapter itself or within an appendix to the ES.

National Planning Policy and Guidance

38. The EIA will be undertaken having regard to the National Planning Policy Framework (NPPF)¹⁵. The NPPF sets out the Government's economic, environmental and social planning policies for England. The policies contained within the NPPF articulate the Government's vision of sustainable development, which are intended to be interpreted at a local level, to meet the requirements of local aspirations.
39. As relevant to the EIA, specifically to the scope, methodology and assessment of effects for the EIA technical topics, the NPPF shall be considered throughout undertaking of the EIA and preparation of the ES.
40. The EIA will also refer to, as relevant to the EIA technical topics, the Planning Practice Guidance (PPG)¹⁶, which is an online resource. The PPG aims to make planning guidance more accessible, and to ensure that the guidance is kept up to date.

Strategic Planning Policy and Guidance

41. As relevant to the EIA technical topic scope, methodology or assessment of effects, the ES will have regard to the following key strategic planning documents. Any additional strategic planning policy and guidance documents considered relevant to the technical assessments which are covered by the EIA will also be considered:
- The London Plan (2021): Spatial Development Strategy for Greater London, 2021¹⁷ - hereafter referred to as 'the London Plan' and
 - Supplementary and London Planning Guidance¹⁸ (SPG/LPG) (i.e. further guidance on policies in the London Plan that cannot be addressed in sufficient detail in the plan itself).

Local Planning Policy and Guidance

42. As relevant to the EIA technical topic scope, methodology or assessment of effects, the ES will have regard to key local planning policy and guidance documents:
- **Camden Local Plan (2017)**¹⁹: The Camden Local Plan (2017) sets out the Council's Planning Policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). It ensures that Camden continues to have robust, effective and up-to-date planning policies that respond to changing circumstances and the borough's unique characteristics. The Local Plan covers a period from 2016 – 2031.

¹⁵ Ministry of Housing, Communities and Local Government, 2021, National Planning Policy Framework. Available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004408/NPPF_JULY_2021.pdf

¹⁶ Ministry of Housing, Communities and Local Government, 2016. Last updated 24th June 2021. Available here: <https://www.gov.uk/government/collections/planning-practice-guidance>

¹⁷ GLA March 2021, The London Plan 2021, https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf.

¹⁸ London Assembly. List of Adopted SPGs: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance>

¹⁹ <https://www.camden.gov.uk/documents/20142/3912524/Local+Plan+Low+Res.pdf/54bd0f8c-c737-b10d-b140-756e8beae95>

- **Camden Site Allocations Plan (2013)**²⁰: Camden Site Allocations sets out the Council's key objectives and guidance for development of land and buildings on significant sites which are likely to be subject to development proposals during the lifetime of the Core Strategy (2010-2025). These allocations are intended to promote sustainable development and assist in delivering the priorities and objectives of the NPPF, the Council's Local Plan and the London Plan.
 - **Gospel Oak and Haverstock Community Vision (2021)**²¹ – Camden have developed the first draft of the Community Vision for Gospel Oak and Haverstock – a planning framework that will help to guide where and how money is invested in the neighbourhood and make it a better place to live, work and visit. The guidance sets out some key development principles and planning objectives to help shape, influence and guide future development proposals in the area so that they are acceptable and can deliver positive benefits and improvements to make the area even better for the local community.
 - **Camden Planning Guidance**²²: Camden Planning Guidance (CPG) provides advice and information on how Camden will apply its planning policies. The Council has reviewed its CPG documents to support the delivery of the Camden Local Plan, following its adoption in 2017. The adopted CPG documents can be 'material considerations' in planning decisions. However, they have less weight than the Local Plan or other development plan documents.
43. In terms of emerging policy, the Site Allocations Local Plan (SALP) was published for consultation in February 2020. The SALP was then subject to further changes which were consulted on in January 2021. The Plan is now subject to further review and further consultation is expected in 2023 with a target adoption of mid-2025. At this stage, in line with paragraph 48 of the NPPF, limited weight can be given to the emerging SALP.

Other Guidance

44. In addition to any relevant planning policies that inform the scope, methodology or assessment of effects, as relevant, the technical topic chapters of the ES will present a summary of any pertinent recognised industry guidance documents.

EIA METHODOLOGY

EIA Methodology and Approach to Assessment of the Proposed Development

45. In addition to the EIA Regulations, there is also guidance available that has been referenced where appropriate, including but not limited to:
- In February 2020, the Withdrawal Agreement came into force that established the terms of the United Kingdom's orderly withdrawal from the European Union (EU). As the UK is no longer part of the EU, it is not required to adhere to EU laws (regulations, directives, decisions) or guidance. That being said, reference has still been made to the European Commission's (EC's) various EIA guidance documents as these currently remain in line with the UK's EIA Regulations and therefore provide helpful guidance;
 - At a domestic level, reference has been made to the Department for Levelling Up, Housing and Communities overarching Planning Practice Guidance (PPG);
 - In addition, the Highway England's Design Manual for Roads and Bridges 'Sustainability and Environment' – LA 104 (Environmental Assessment and Monitoring) has been referred to as applicable;

²⁰ <https://www.camden.gov.uk/documents/20142/4820180/Site+Allocations+Plan+2013.pdf/fee9b22c-ac6f-900f-6d78-28f42d4bf084>

²¹ <https://www.camden.gov.uk/gospel-oak-and-haverstock-community-vision#dfmo>

²² <https://www.camden.gov.uk/camden-planning-guidance>

- In relation to publications from professional bodies, reference has been made to Institute of Environmental Management and Assessment (IEMA) publications as these include best practice/suggested improvements to the EIA process. This includes:
 - IEMA 'ES Review Criteria' (COM3-6)²³;
 - IEMA 'Environmental Assessment of Road Traffic' (1993)²⁴;
 - IEMA 'Guidelines for Environmental Impact Assessment' (2004)²⁵;
 - IEMA 'Special Report into the State Environmental Impact Assessment Practice in the UK' (2011)²⁶;
 - IEMA 'Shaping Quality Development' (2015)²⁷;
 - IEMA 'Delivering Quality Development' (2016)²⁸;
 - IEMA 'Delivering Proportionate EIA' (2017)²⁹;
 - IEMA 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (2017)³⁰;
 - IEMA 'Materials and Waste in EIA' (2020)³¹;
 - IEMA 'Climate Change Resilience and Adaption' (2020)³²;
 - IEMA 'Major Accidents and Disasters in EIA: A Primer' (2020)³³;
 - IEMA 'Principles of Cultural Heritage Impact Assessment in the UK' (2021)³⁴;
 - IEMA 'Guide to Effective Scoping of Human Health' (2022)'
 - IEMA 'Determining Significance for Human Health in Environmental Impact Assessment' (2022) and;
 - IEMA 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (2022)³⁵.
- Whilst primarily written for major infrastructure projects, reference is also made to guidance/advice notes published by the National Infrastructure Planning, Planning Inspectorate, where appropriate, as these can include relevant/helpful information;
- Applicable case law; and
- Topic specific guidance and assessment criteria, where appropriate.

46. In accordance with the EIA Regulations and best practice guidance documents, the EIA will comprise an assessment for each of the relevant technical topics against an appropriate baseline condition of the site and surrounding area, using methods of prediction including established standards and industry guidelines and techniques confirmed as part of the EIA Scoping process. In all cases, the source data and guidance used to establish the baseline conditions and assessment methodology will be clearly set out within the ES.

Baseline Conditions

47. Baseline assessments will utilise any existing and available information, as well as new information

²³ IEMA, undated; EIA Quality Mark – ES Review Criteria COM 3-6.

²⁴ IEMA, 1993 'Environmental Assessment of Road Traffic'

²⁵ IEMA, 2004, Guidelines for Environmental Impact Assessment.

²⁶ IEMA, 2011. The State of Environmental Impact Assessment Practice in the UK.

²⁷ IEMA, November 2015. Shaping Quality Development.

²⁸ IEMA, 2016; Delivering Quality Development.

²⁹ IEMA, 2017; Delivering Proportionate EIA.

³⁰ IEMA, 2017, Assessing Greenhouse Gas Emissions and Evaluating their Significance'

³¹ IEMA, 2020; Materials and Waste in EIA.

³² IEMA, 2020; Climate Change Resilience and Adaption'

³³ IEMA, 2020, Major Accidents and Disasters Guidelines

³⁴ IEMA, 2021, Principles of Cultural Heritage Impact Assessment in the UK

³⁵ IEMA, 2022, Assessing Greenhouse Gas Emissions and Evaluating their Significance

either collected through baseline surveys undertaken during the course of the EIA process or additional information provided as part of the EIA Scoping Opinion and consultation process. This information will be used to present an up to date description of the current baseline conditions of the site and surrounding area within the ES (within the individual technical chapters).

48. In addition, as per the requirements of the EIA Regulations, consideration as to how the current baseline conditions may evolve in the future in the absence of the Proposed Development will also be presented in the ES (within the individual technical chapters). This likely evolution of the baseline conditions (the 'future baseline') will be quantified where possible and where not possible, a qualitative review will be presented.

Sensitive Receptors

49. When undertaking an EIA, it is important to identify potential environmental receptors which may be impacted by the Proposed Development and may need to be considered as part of the assessment.
50. The environmental receptors that may be sensitive to change are identified and discussed within the scope of each technical topic in this EIA Scoping Report (hereafter referred to as 'sensitive receptors'). The sensitive receptors outlined within this EIA Scoping Report have been identified at the time of writing as part of the EIA scoping process, however these will be reviewed during preparation of the ES and may be subject to change.

Demolition and Construction

51. The ES (within a non-technical chapter titled 'Demolition and Construction') will provide an outline of the anticipated demolition and construction programme and related activities and aspects (i.e. demolition and enabling works, substructure works, superstructure works etc., demolition waste volumes and construction material quantities, Heavy Goods Vehicle (HGV) movements and HGV routing). In addition, key environmental controls and management measures relevant to the Proposed Development (including relevant codes of construction practice) will be presented. It is currently envisaged that the Proposed Development will be delivered in phases, for which the current strategy is set out in the *Overview of Proposed Development* section of this Scoping Report. Any assumptions made regarding indicative phasing for the purposes of assessment will be clearly set out and assessed as appropriate within the ES.
52. This information will inform the demolition and construction impact assessments. Throughout the demolition and construction impact assessments, the assumption will be made that the standard environmental controls required under legislation and best practice guidance are met as a matter of course.
53. The assessment of the potential for likely significant effects arising during the demolition and construction works will be addressed within each of the individual technical assessment chapters of the ES and will be assessed against the existing Baseline Conditions. The assessment will take into consideration any other surrounding development schemes which are likely to be under construction at the same time as the Proposed Development. The demolition and construction assessments presented within the technical chapters of the ES will identify the need for any additional or bespoke environmental management or mitigation measures in order to avoid, prevent, reduce or off-set any significant adverse effects identified. In addition, where appropriate the demolition and construction assessments will consider the phasing of works and the subsequent potential for impacts to occur upon introduced receptors to the site - e.g. demolition and construction effects associated with later phases of development upon early occupiers on-site. The approach to this will be clearly set out within the ES.
54. The ES will present demolition and construction related effects both without mitigation measures included (unless embedded mitigation measures have been identified) and with mitigation measures applied. The latter effects constitute the 'residual effects' identified as part of the assessment.

55. Where required, a description of any proposed monitoring arrangements will also be presented and would define (where appropriate) the procedures regarding the monitoring of the relevant significant adverse effects, the types of parameters to be monitored and the monitoring duration.
56. All the measures proposed within the technical chapters or detailed within this EIA Scoping Report will be compiled and presented in a mitigation and monitoring schedule (to be presented as a separate chapter within Volume 1 of the ES).
57. It is anticipated that any required demolition and construction related environmental management/mitigation and monitoring measures would be secured and controlled through an appropriate Construction Environmental Management Plan (CEMP) (or equivalent) and it is proposed that the requirement for these documents be secured by means of suitably worded planning conditions to be attached to the permission (if granted). Key mitigation and management controls that would later form part of a CEMP will be presented in the ES to help define the policies, procedures and management framework for the implementation of any identified specific environmental management and mitigation controls and monitoring.

Environmental Design Management Measures

58. Throughout the EIA (including this EIA Scoping Report and the ES), where applicable, the way that likely environmental effects have been or will be avoided, prevented, reduced or offset through design and/ or management measures will be described. These are measures that are inherent in the design and construction of the Proposed Development (also known as 'embedded measures'). Where known at this stage, some of these embedded measures have been identified at the EIA scoping stage and are described, where relevant, in the technical topic appendices.
59. Embedded measures relevant to the construction phase will be summarised within **ES Volume 1, Chapter 15: Environmental Management, Mitigation and Monitoring Schedule**. These measures are to be included within a CEMP, the requirement for which is proposed to be secured via an appropriate planning condition.
60. Once operational, such embedded measures will be integral to the Proposed Development. A number of technical studies (e.g. noise and ecology) have been undertaken to inform the design and allow early identification of mitigation measures so that these can be incorporated into the Proposed Development. Embedded measures are therefore either incorporated into the design from the outset or identified through the assessment process. Proposed environmental enhancements will also be described, where applicable. The scheme's development has been informed by a series of workshops which have involved a wide range of environmental specialists to ensure that constraints and opportunities have been properly identified, understood and, where required, measures incorporated into designs for the Proposed Development.
61. Embedded measures will be considered prior to the assessment of effects to avoid considering assessment scenarios that are unrealistic in practice, i.e. do not take account of such measures even though they are likely to be standard practice and/ or form part of the proposed design. These will then be followed through the assessment to ensure that realistic likely environmental effects are identified. Where likely significant adverse effects are identified after considering these embedded measures, 'further mitigation measures' will be proposed.
62. All embedded mitigation and enhancement measures will be described within the Proposed Development Chapter of the ES with the rationale for the inclusion of the identified embedded measures and the associated commitment to implementing such measures clearly stated. In addition, mitigation and enhancement measures and any monitoring requirements will be summarised within **ES Volume 1, Chapter 15: Environmental Management, Mitigation and Monitoring Schedule**.

Completed Development

63. The ES will present a description of the Proposed Development in order to provide suitable context to enable the assessment of potential and likely significant environmental effects. Enough information on the Proposed Development, in terms of the key aspects, will be presented to allow an understanding of the development being proposed, in order to enable the assessment of potential and likely significant environmental effects of the completed and operational development. Any assumptions made will be clearly presented in the narrative.
64. As appropriate to the topic in question, the technical chapters of the ES will address the phased delivery of the Proposed Development.
65. The ES (in a non-technical chapter titled 'The Proposed Development'), will present information on the parameters and details of the development sought for approval, as set out below.

Approach to the Assessment of Detailed Component of the Proposed Development

66. As a hybrid planning application, Phase 1 of the Proposed Development will be submitted in detail. Assessments of this phase will be based on detailed design information including but not limited to fixed area schedules, floor plans, layouts, elevations and massing. Where this detailed information is available and provides the basis of technical assessments within the ES, this will be stated.

Approach to the Assessment of Outline Component of the Proposed Development

67. Phase 2 to Phase 8 is to be submitted in outline. Assessments of these remaining phases will rely on relevant development 'parameters' and 'guidelines' for assessment purposes. The Parameter Plans, Design Guidelines and Development Specification are documents and plans that will describe the principal components of the development, provide parameters that will guide future detailed reserved matters applications, and which will act as controls to limit development within the parameters set. These documents will set out the information required to allow the impacts of the Proposed Development to be identified with sufficient certainty.
68. The combination of the Parameter Plans, Design Guidelines and Development Specification (Refer to the *Format of the Planning Application* section below) will provide a number of development controls including the upper (maximum) and lower (minimum) (if required) building and use class floorspace limits and establish a 3-dimensional building envelope within which the detailed design of buildings can come forward through the submission of reserved matters applications.
69. The technical assessments (such as Socio-Economics, Wind Microclimate and Heritage, Townscape and Visual Impact Assessment) will ensure that a reasonable worst-case scenario is assessed, supplemented by an assessment of the illustrative scheme, where appropriate. The basis of assessment will be clearly set out in each chapter of the ES and summarised within the EIA Methodology chapter.
70. For the outline component, in general three main aspects which are to be sought for approval will be considered within the ES which form a majority of the reasonable worst-case scenarios required for the technical assessments, including:
 - For massing-based assessments i.e. Daylight, Sunlight, Overshadowing, Wind and the Heritage Townscape Visual Impact Assessment - the maximum height and maximum layout parameters will be assessed. This will assess the likely worst-case scenario for the massing assessments in most cases. Where flexibility is sought in terms of the maximum and minimum massing / building heights within the outline phases, each technical assessment will consider the potential effects within this range. Design Codes will restrict the maximum (or minimum) massing for these elements and the range will be considered within massing based assessments, where necessary.
 - For population-based assessments i.e Socio Economics - this scenario will assess the maximum unit numbers and tenure types (i.e. greatest population yield) as defined by the Development

Specification. If flexibility is sought in regard to the amount of employment generating uses within the outline component, a minimum amount of this type of floorspace will be agreed and considered within the socio-economics assessment; and

- For studies relating to trip generation i.e. Air Quality and Noise and Vibration - the maximum transport trip generating uses will be used to allow an assessment of the reasonable worst-case effects on public transport and road traffic (noise and emissions) to be identified. This would assume the Applicant would bring forward maximum trip generating uses across the allocation of retail/commercial space within the Proposed Development.

71. The Illustrative Masterplan comprises one example of how the Proposed Development *could* come forward within the parameters sought for approval by the planning application, so approval is not sought for the Illustrative Masterplan itself through the outline planning application

Phasing of the Proposed Development

72. As appropriate, the technical chapters of the ES will address the phased delivery of the Proposed Development. Assessments will take into account any temporary effects on sensitive receptors during interim stages.
73. Phase 1 is to be submitted in detail and constructed first (it may come forward in two parts, Phase 1A and Phase 1B). Once complete and operational (and as such new potentially sensitive receptors are introduced) potential effects associated with the demolition and construction of the outline components (Phases 2-8) on introduced receptors may require further assessment. Where applicable, the ES will assess an interim period/s to ensure the effects are considered and if required, mitigation applied to reduce any likely significant adverse effects. Where this is required, this will be clearly stated within the ES.

Format of the Planning Application

74. The Applicant intends to submit a hybrid planning application to LBC for the development as described above, with proposals submitted in detailed form for part of the site and in outline for the remainder of the site. For the outline component of the application, all matters are likely to be reserved for approval at a later date through reserved matters applications to the LBC. Phase 1 will be submitted in detailed form where details are proposed to be submitted in relation to the scale, layout, appearance, landscaping, access and an amount of development.
75. Whilst details of the following 'matters' are reserved for future determination for the outline component, approval will be sought for Parameter Plans that will accompany the planning application. The Parameter Plans will include details of:
- Land Use - the building/ site use or uses proposed for the development and any distinct development/ neighbourhood zones/ phases within the site;
 - Scale of Development - the maximum and minimum height limits for each development zone or building plot in relation to their surroundings;
 - Layout of Development - the way in which development zones or building plots, routes and open spaces are provided, situated and orientated in relation to each other;
 - Landscaping - the design, treatment and materiality of the public realm; and
 - Means of Access - in regard to the accessibility of the site for vehicles, cycles and pedestrians in terms of positioning and treatment of accesses and circulation routes and how these fit into surrounding network.
76. The outline component of the planning application will seek approval for an 'Amount of Development' for the Proposed Development. This is the maximum quantum (amount) of residential units which will be sought for approval. An 'Amount of Development' represents an 'up to' or 'maximum' amount of development that could come forward across the site.

77. The outline component of the planning application will also be supported by Control Documents which include a set of Parameter Plans (listed above), Design Guidelines and Development Specifications which will describe the principal components of the development, provide parameters that will guide future reserved matters applications, and which will act as controls to limit development within the parameters set. These documents will set out the information required to allow the impacts of the Proposed Development to be identified with sufficient certainty and will be intended to be secured via planning conditions.
78. Should the planning permission be granted, subsequent 'Reserved Matters Applications' will be made to LBC to agree the design details that have been 'reserved' for later approval by the Applicant and LBC under the outline elements of the planning application.
79. The ES will present a description of the Proposed Development, in terms of the parameters and uses sought for approval. Sufficient information will be presented to enable the assessment of potential impacts and likely significant effects of the completed and operational development. Any assumptions made will be clearly presented in the narrative.

Cumulative Effects

80. The cumulative assessment will be based on the information available on the local authorities planning register. Generally, the schemes (referred to as 'cumulative schemes') to be included within the cumulative effects assessment will be within 1km of the site and either have:
- Full planning consent; or
 - A resolution to grant consent; and
 - An uplift of more than 10,000m² GEA of mixed-use floorspace or, provide over 150 residential units; or
 - Office to residential conversions (granted under the General Permitted Development Order) giving rise to over 150 residential units.
81. By applying an initial screening exercise (using the above criteria) to all the surrounding redevelopment schemes, the cumulative effects assessment of the EIA becomes more focused on the larger schemes (i.e. those with the most potential to interact in a cumulative manner).
82. Applications that have been submitted but not yet determined may be considered, depending on the nature and location of these applications and the likelihood of cumulative effects with the Proposed Development.
83. A preliminary list of cumulative schemes for consideration within the EIA has been identified and is presented in **Table 2** and **Figure 7** in line with the above criteria. As part of this EIA scoping process, the local authority (and other consultees, as relevant) is invited to comment on the proposed cumulative schemes, so that the list of cumulative schemes can be agreed.

Table 2 Cumulative Schemes

Ref	Address	App. Ref.	Description of Development	Status <i>As per desk-based review</i>
1 (shown on Figure 7)	Land Bounded by Haverstock Road, Wellesley Road and Vicars Road including nos. 121-211 Bacton Low Rise Estate, 113A, 115 and 117 Wellesley Road, and 2-16 Vicars Toad, London, NW5.	2020/1019/P	Amendment to planning permission 2012/6338/P dated 25/04/2013 (as amended by planning permissions 2014/3633/P, 2015/1189/P and 2016/5358/P) for 'redevelopment of Bacton Low Rise Estate, Gospel Oak District Housing Office and Vicar's Road workshops following the demolition of all existing buildings, to provide a total of 294 residential units and associated works'; namely to alter the description to omit the number of	Approved 31/03/2020

Ref	Address	App. Ref.	Description of Development	Status <i>As per desk-based review</i>
			commercial units and number and tenure type of residential units and to insert a planning condition to secure 294 residential units comprising 196 market, 11 intermediate and 107 social rent units and 259 m ² of B1 floorspace. Type of Application: Non-Material Amendment	
2 (shown on Figure 8)	Murphy's Yard	Planning Application withdrawn (<i>to be assessed qualitatively</i>)	<p>The Planning Application for the redevelopment of the site has been withdrawn to undertake further public consultation. The proposals may come forward across the future redevelopment of Murphy's Yard could include:</p> <ul style="list-style-type: none"> • Circa 750 homes, including 35% affordable homes for local people • Circa 40,500 m² of industrial space • Up to 34,500 m² of office space • Up to 16,000 m² of healthcare space • New landscaping and routes, including the new Heathline. 	<p>n/a – The planning application for the redevelopment of the existing Murphy's Yard has been withdrawn. As the planning application has been withdrawn and does not remain an active planning application within the London Borough of Camden planning system, full assessment of the cumulative impacts associated with the Proposed Development and the Murphy's Yard scheme cannot be undertaken.</p> <p>However, as the Murphy's Yard site remains allocated under local planning policy, it is assumed that some development will take place in the future and for the purposes of this assessment will be considered to be of a similar nature to that detailed within the withdrawn planning application. The cumulative impact of the Proposed Development and the Murphy's Yard site will be covered off qualitatively under a separate cumulative tier within the cumulative effects assessment across the ES. The cumulative impacts of Murphy's Yard will only be considered as relevant within the ES.</p>

Figure 7 Cumulative Scheme Map

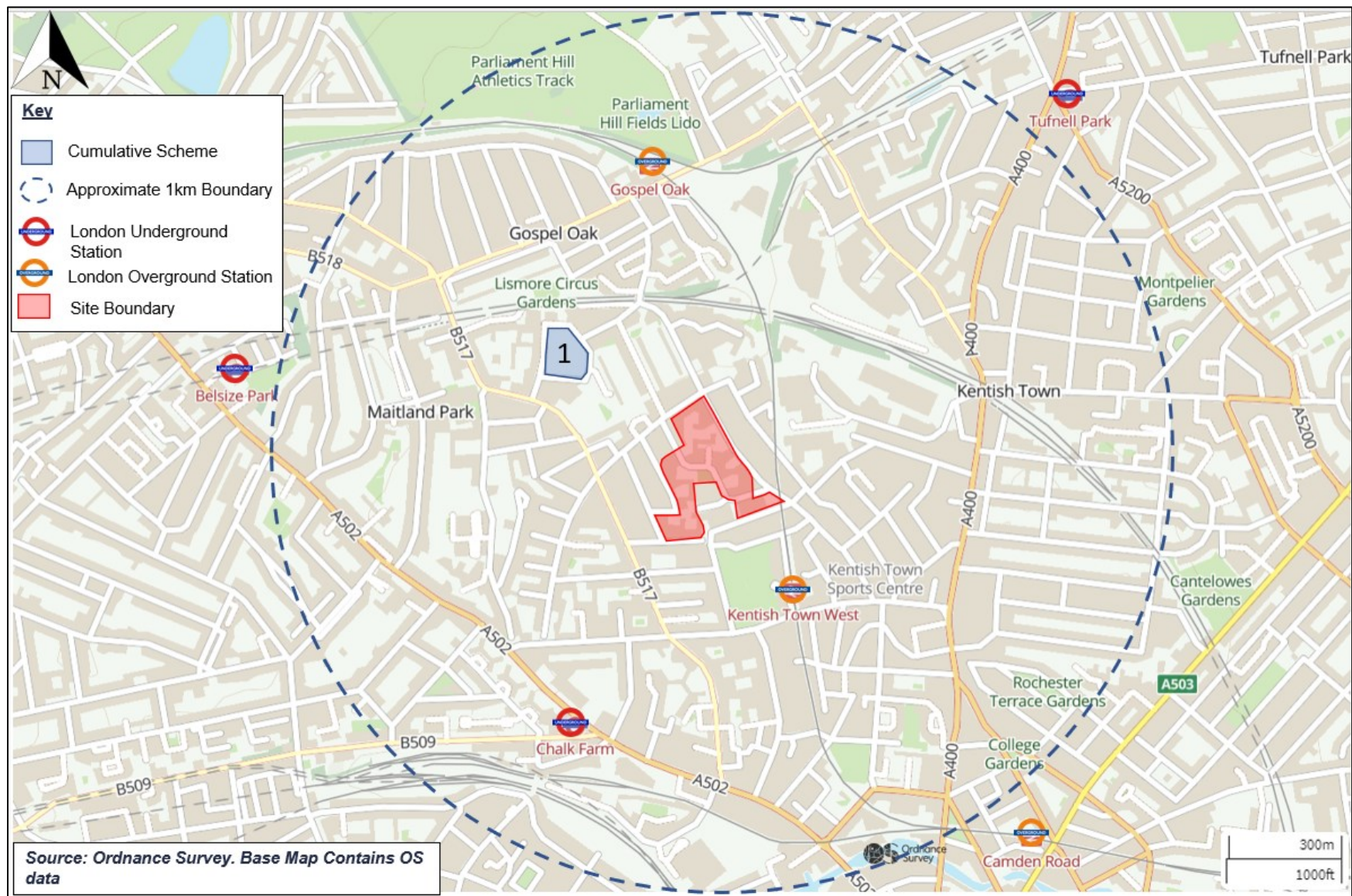
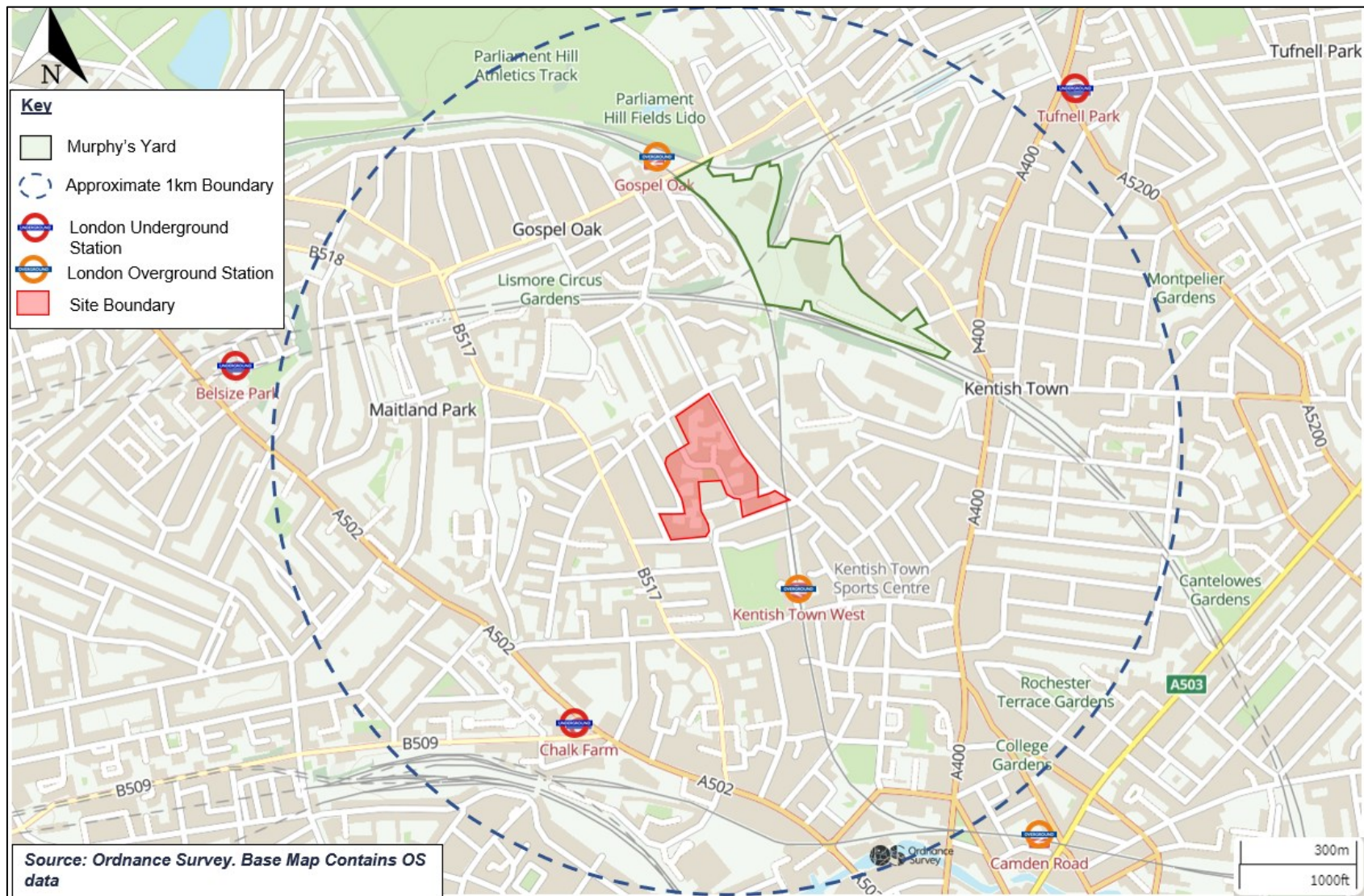


Figure 8 Location of Murphy's Yard



84. Each technical chapter of the ES will consider the potential for cumulative effects associated with the schemes identified for inclusion within the cumulative effects assessment. Each technical ES Chapter will be clear on the cumulative schemes that have been considered within the cumulative effects assessment.

Effect Interactions

85. Effect interactions occur as interactions between effects associated with just one project, i.e. the combination of individual effects arising as a result of the Proposed Development, for example effects in relation to noise and airborne dust on a single receptor.
86. Effect Interactions from the Proposed Development itself on particular receptors at the site and within the surrounds will be considered during the demolition and construction works and also once the Proposed Development is completed and operational. Dependent on the relevant sensitive receptors, the assessment will focus either on key individual receptors or on groups considered to be most sensitive to potential effect interactions. The potential interaction of residual effects that are of minor, moderate or major scale, will be considered within this assessment. Residual effects which are negligible, will be excluded from this assessment as by virtue of their definition, they are considered to be imperceptible.
87. There is no established methodology for assessing the impact of cumulative effects on a particular receptor. The interaction of a combination of individual effects would be determined to be either 'not significant' or 'significant', a scale of the combined effects (minor, moderate or major) would not be applied. If one of the individual effects is significant, the combination of effects would be regarded as 'significant'. If none of the individual effects are significant, consideration will be given as to whether or not the combination of many not significant effects could result in a combined significant effect, based on professional opinion.
88. Consideration of effect interactions will be presented within the ES in a separate chapter (i.e. Effect Interactions (ES Volume 1)).

Alternatives and Design Evolution

89. The EIA Regulations (Schedule 4) require that the ES provides "*a description of the reasonable alternatives [...] relevant to the proposed project and its specific characteristics*" which have been considered by the Applicant and "*an indication of the main reasons for selecting the chosen option, including comparison of environmental effects*".
90. The ES will summarise the evolution of the Proposed Development, the alternatives considered (where relevant), and key modifications made during the design process. Environmental considerations which have influenced this process will be discussed, and a qualitative comparison will be undertaken of the different design options and their relevant environmental effects. Matters that will be considered in terms of design evolution include land uses, layout, building heights and massing. The preferred design alternative, culminating with the Proposed Development being sought for approval, will be discussed.
91. A specific chapter, **ES Volume 1, Chapter 3: Alternatives and Design Evolution**, will focus on the consideration of the main alternatives (as relevant) and the design evolution. The focus will be on main alternatives considered (as relevant), the evolution of the design, and how environmental considerations influenced the evolution of the scheme. The summary of the design evolution will also consider initial environmental analysis undertaken on the evolving scheme.

DETERMINING EFFECT SIGNIFICANCE – TERMINOLOGY AND APPROACH

Reference to ‘Impact’ and ‘Effect’

92. It is noted that the terms ‘impact’ and ‘effect’ are distinctly different. Having gained an understanding of the likely impact it is then important to know whether the change in environmental or socio-economic conditions results in a significant environmental effect. The impacts of the Proposed Development may or may not result in significant effects on the environment, depending on the sensitivity of the receptor and possible other factors (such as duration). The assessment of the likely significant effects of the development is a requirement identified by Schedule 4 of the EIA Regulations.

Receptor Sensitivity and Magnitude of Impact

93. To achieve a consistent approach across the different technical disciplines addressed within the ES (Volume 1), assessments will broadly define the sensitivity of the receptors that could be affected by the Proposed Development and the magnitude of impact or change from the baseline conditions in order to derive the resultant effect. Technical specialists will use their own approach or amend the approach stated below based on what is appropriate for their assessments (i.e. to align with relevant technical guidance).
94. Terminology to describe the sensitivity of receptors and magnitude of impact or change from the baseline conditions is broadly as follows:
- High;
 - Medium;
 - Low; or
 - Negligible.
95. Where there is no impact/ change, no assessment will be required due to there being no potential for significant effects.
96. Each of the technical assessment chapters of the ES (Volume 1) will provide further detail on the definition of each of the above terms specific to the topic in question and will also provide the criteria, including sources and justifications, for quantifying the different levels of receptor sensitivity and ‘impact magnitude’. Where possible, this will be based upon quantitative and accepted criteria (for example, national standards for air quality and noise), together with the use of value judgement and expert interpretation.

Identification of a Resultant Effect

97. The basis for determining the resultant effect generally takes into account the sensitivity of the receptor and magnitude of impact or change from the baseline conditions. A generic matrix that combines the sensitivity of the receptor and the magnitude of impact to identify the resultant effect is provided within **Table 3**.

Table 3 Resultant Effects

Receptor Sensitivity	Magnitude of Impact			
	High	Medium	Low	Negligible
High	Major	Major	Moderate	Minor
Medium	Major	Moderate	Minor	Negligible
Low	Moderate	Minor	Negligible	Negligible
Negligible	Minor	Negligible	Negligible	Negligible

Effect Scale

98. The categories and definitions of the 'scale' of the resultant effect i.e. definitions of Major, Moderate, Minor and Negligible effects will be adjusted to suit the technical topic in question; where this is the case revised definitions of effect scale will be presented in the technical assessment chapters of the **ES (Volume 1)** and in **ES Volume 2**.
99. Where there is no impact to a receptor and therefore no effect, this will be stated.

Effect Nature

100. **Table 4** provides definitions of the 'nature' of the resultant effect i.e. definitions of Adverse and Beneficial.

Table 4 Definition of the Nature of the Resultant Effect

Type of Effect	Description
Adverse	Detrimental or negative effects to an environmental / socio-economic resource or receptor. The quality of the environment is diminished or harmed.
Neutral	The quality of the environment is preserved or sustained or there is an equal balance of adverse and beneficial effects.
Beneficial	Advantageous or positive effect to an environmental / socio-economic resource or receptor. The quality of the environment is enhanced.

Geographic Extent of Effect

101. The ES (Volumes 1 and 2) will identify the geographic extent of the identified effects. At a spatial level, 'site' or 'local' effects are those affecting the site and neighbouring receptors, while effects upon receptors in the LBC beyond the vicinity of the site and its neighbours are considered to be at a 'district/ borough' level. Effects affecting Greater London are considered to be at a 'regional' level. There are not considered to be any effects likely above this spatial level associated with the Proposed Development.

Effect Duration

102. For the purposes of the ES, effects that are generated as a result of the demolition and construction works (i.e. those that last for this set period of time) will be classed as 'temporary'; these may be further classified as either 'short term' or 'medium-term' effects depending on the duration of the demolition and construction works that generate the effect in question. Effects that result from the completed and operational phases of the Proposed Development will be classed as 'permanent' or 'long-term' effects.

Direct and Indirect Effects

103. The ES will identify whether the effect is 'direct' (i.e. resulting without any intervening factors) or 'indirect' or 'secondary' (i.e. not directly caused or resulting from something else).

Effect Significance

104. Following identification of an effect, the effect scale, nature, geographic extent and duration using the above summarised terminology, a clear statement will then be made within the ES as to whether the effect is significant or not significant. As a general rule, the following applies³⁶:
- 'Moderate' or 'major' effects are deemed to be 'significant';
 - 'Minor' effects are considered to be 'not significant', although they may be a matter of local concern; and

³⁶ Where this differs for a technical topic, it will be clearly stated in the individual methodology

- 'Negligible' effects are considered to be 'not significant' and not a matter of local concern.

- 105.** Where mitigation measures are identified to either eliminate or reduce likely significant adverse effects, these will be incorporated into the ES, for example either through the design, or will be translated into demolition and construction commitments; or operational or managerial standards/ procedures.
- 106.** The ES will then highlight the 'residual' and likely significant effects (those effects which remain following the implementation of suitable mitigation measures) and classify these in accordance with the terminology defined above.

SCOPE SUMMARY

- 107.** To assist the reader, a summary of what is proposed to be 'scoped in' and 'scoped out' of the EIA, is provided in **Table 5**.
- 108.** Further detail on each topic is provided in the preceding technical sections of this request for an EIA Scoping Opinion.

Table 5 EIA Technical Topics

Environmental Topics	'Scoped In' the ES	Additional Assessments to Accompany the Planning Application
Socio Economics	✓	-
Health (Addressed within each technical topic ES Chapter)	✓	Health Impact Assessment (Planning Report)
Traffic and Transport	x	Transport Assessment and Travel Plan
Air Quality	✓	Air Quality Neutral Assessment Air Quality Positive Statements (<i>included as part of the Air Quality ES Chapter</i>)
Climate Change	✓	Whole Life Carbon Report Circular Economy Statement
Noise and Vibration	✓	-
Daylight, Sunlight, Overshadowing and Solar Glare (residential properties outside of the red line boundary)	✓	-
Daylight, Sunlight and Overshadowing (internal, new receptors within the Proposed Development)	x	Internal Daylight Assessment (Planning Report)
Light Pollution	x	-
Wind Microclimate	✓	-
Built Heritage, Townscape and Visual Impact Assessment	✓	-
Archaeology (Buried Heritage)	x	Archaeological Desk Based Assessment
Ecology and Biodiversity	✓	Preliminary Ecological Appraisal
Geo-environmental (Ground Conditions, Groundwater and Land Take and Soils)	x	Geoenvironmental Desk Study (Phase 1)
Project Vulnerability, Major Accidents and Natural Hazards	x	Air Quality Assessment Noise and Vibration Assessment

Environmental Topics	'Scoped In' the ES	Additional Assessments to Accompany the Planning Application
		Daylight, Sunlight, Overshadowing and Solar Glare Assessment Wind Microclimate Assessment Flood Risk Assessment Intrusive Ground Investigation (to be conditioned if planning permission is granted) UXO Emergency Response Plan Refurbishment and Demolition Survey Remediation Strategy (if required) Piling Risk Assessment
Waste and Materials	x	Outline CEMP Site Waste Management Plan Design and Access Statement Circular Economy Statement
Water Resources, Drainage and Flood Risk	x	Flood Risk Assessment and Drainage Strategy

FORMAT AND CONTENT OF THE EIA

109. The proposed scope and structure of the ES is as follows:

- **ES Volume 1: Main ES** – a document which forms the main body of the ES, and which comprises of the following non-technical and technical chapters:
 - Chapter 1. Introduction
 - Chapter 2. EIA Methodology;
 - Chapter 3. Alternatives and Design Evolution;
 - Chapter 4. The Proposed Development;
 - Chapter 5. Demolition and Construction;
 - Chapter 6. Socio-Economics;
 - Chapter 7. Climate Change
 - Chapter 8. Air Quality;
 - Chapter 9. Noise and Vibration;
 - Chapter 10. Daylight, Sunlight, Overshadowing and Solar Glare;
 - Chapter 11. Wind Microclimate;
 - Chapter 12. Ecology;
 - Chapter 13. Effect Interactions;
 - Chapter 14. Likely Significant Effects and Conclusions; and
 - Chapter 15. Environmental Management, Mitigation and Monitoring Schedule.

- **ES Volume 2: Heritage, Townscape and Visual Impact Assessment** – a separate heritage, townscape and visual impact assessment (HTVIA) document that will be accompanied by a full set of views and verified images, as agreed with LBC as part of this EIA Scoping Process:
 - **ES Volume 3: Technical Appendices** – comprises background data, technical reports, tables, figures and surveys.
 - **ES Non-Technical Summary (NTS)** - this will be a separate document providing a concise description of the Proposed Development, the alternatives considered, any identified mitigation measures and the residual likely significant environmental and socio-economic effects.
- 110.** Schedule 4 of the EIA Regulations sets out the information for inclusion within an ES. In response to this Schedule of the EIA Regulations, a 'way-finding' table which sets out the information for inclusion within an ES and where this information will be presented within an Appendix of the ES.

REQUEST FOR AN EIA SCOPING OPINION

111. This Report requests a Scoping Opinion of the LBC pursuant to Regulation 15 of the EIA Regulations. The EIA Scoping Report suggests a comprehensive scope of work based on previous experience of the assembled team of specialists and existing knowledge of the site. The LBC and consultees are invited to consider the contents of this Report and comment accordingly within the five-week period prescribed by the EIA Regulations.

GLOSSARY OF ABBREVIATIONS AND TERMS³⁷

APA	Archaeology Priority Area
AQMA	Air Quality Management Area
CA	Conservation Area
CEMP	Construction Environmental Management Plan
CFD	Computational Fluid Dynamics
CPG	Camden Planning Guidance
EA	Environment Agency
EIA	Environmental Impact Assessment
ES	Environmental Statement
EU	European Union
GP	General Practitioner
ha	Hectares
HDV	Heavy Duty Vehicles
HGV	Heavy Goods Vehicle
HTVIA	Heritage, Townscape and Visual Impact Assessment
IEMA	Institute of Management and Assessment
LBC	London Borough of Camden
LEZ	Low Emission Zone
LDV	Light Duty Vehicles
LNR	Local Nature Reserve
LPG	London Planning Guidance
NHS	National Health Service
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
NTS	Non-Technical Summary
PPG	Planning Practice Guidance
PTAL	Public Transport Accessibility Level
SAC	Special Areas of Conservation
SPA	Special Protection Area
SSSI	Site of Specific Scientific Importance
TfL	Transport for London
UK	United Kingdom
EIA Scoping	A written statement of the opinion of the relevant planning authority as to the information to be provided in the Environmental Statement which specifically requires a local planning authority to respond or consult with consultees within a statutory period.
Environmental Impact Assessment	A process by which information about the environmental effects of a development is collected and taken into account by the relevant decision-making body before a decision is given on whether the development should go ahead.
Environmental Statement	A statement that includes such information that is reasonably required to assess the environmental effects of a development.
Grade I Listed Building	A listed building that is of exceptional interest.
Grade II Listed Building	A listed building that is of special interest.
London Plan	The adopted Spatial Development Strategy for London that sets out a vision for London and identifies the means by which this vision might be achieved. Issued in 2021.
Mitigation Measure	Measure aiming at reducing an adverse environmental effect.
National Planning Policy Framework	Came into force in 2021. It sets out the

³⁷ Please refer to the individual topic sheets from more technical abbreviations included within.

	Government's economic, environmental and social planning policies for England and summarises, in a single document, all previous national planning policy advice (Planning Policy Statements and Planning Policy Guidance notes).
Non-Technical Summary	A summary of the Environmental Statement in 'non-technical language'.
Open Space	Includes all open spaces, plus other spaces that provide a break from the densely built-up urban form, such as pedestrianised areas; hard-landscaped areas with private access; pedestrian/cycle and wildlife routes; and all the green infrastructure that links open spaces together, including green corridors, private residential gardens, trees, green roofs, and green landscaped areas.
Overshadowing	Overshadowing occurs when a structure blocks out sunlight from neighbouring properties mainly on the northern side of that structure. It can affect the amount of daylight let into neighbouring properties when the shadow cast falls across windows or glazed doors, or on amenity spaces.
Planning Practice Guidance	A web-based resource seeking to consolidate existing technical guidance into a consolidated online format and provides further detail on the policies contained within the NPPF.
Proposed Development	An area of land that has had a potential scheme put forward to be built on.
Public Transport Accessibility Level Assessment	A means of quantifying and comparing accessibility by public transport for a given site
Receptor (Sensitive)	A component of the natural, created, or built environment such as human being, water, air, a building, or a plant that is affected by an impact.
Site of Importance for Nature Conservation	A non-statutory site identified as being areas of importance for wildlife and geology.
Socio-Economics	The social science that studies how economic activity affects and is shaped by social processes.
Supplementary Planning Document	Documents which seek to give guidance and support on the Council's planning processes and are one of the material considerations in determining planning applications.
The Applicant	The persons or entities making the planning application.
The site	The extent of the development site, as defined by the red-line boundary plan.
Transport Assessment	Prepared and submitted alongside planning applications for developments to identify and address the transport issues relating to the Proposed Development.

APPENDIX A – ‘Scoped In’ Topic Sheets

APPENDIX B – ‘Scoped Out’ Topic Sheets

APPENDIX C – Archaeological Desk-Based Assessment

APPENDIX D – Preliminary Ecological Appraisal

APPENDIX E – Phase I Geotechnical And Geo-Environmental Desk Study Report

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