

Our ref: 2024/5383/P
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Sean O'Leary
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Date: 1 May 2025

Dear Mr O'Leary,

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2017 (as amended in 2018 and 2020)**

RE: Bacton Low Rise Estate – Request for EIA Scoping Opinion

The applicant made a request to the Local Planning Authority for an EIA Scoping Opinion in respect of a an EIA Scoping Report which they commissioned and was prepared by Quod (November 2024). The EIA scoping report has been prepared to help inform the content of an Environmental Statement relating to the comprehensive redevelopment of the above site to deliver an estate regeneration scheme providing 460 residential units (including affordable homes) in buildings ranging in height from 4 storeys up to between 23 and 26 storeys (across multiple blocks), along with areas of open and amenity space (including courtyard gardens), a community square, and a pedestrian laneway between blocks to enhance public access. The request was received by the Council on the 2nd December 2024.

For completeness of records, please accept this letter as the Council's formal Scoping Opinion in accordance with Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), herein referred to as the 'EIA Regulations 2017'.

In adopting this Scoping Opinion, the Council confirms that it carried out consultation with relevant bodies (Regulation 15(4)) and 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)).

The following consultees were consulted in preparing this scoping opinion:

- LBC (London Borough of Camden) – Air Quality
- LBC – Building Control
- LBC – Conservation & Heritage
- LBC – Economic Development/Inclusive Economy
- LBC – Environmental Services (Waste)
- LBC – Environmental Services (Contaminated Land)
- LBC – Environmental Services (Pollution)
- LBC – Lead Local Flood Authority (LLFA)
- LBC – Nature Conservation & Biodiversity
- LBC – Policy
- LBC – Public Health (Camden and Islington Public Health)
- LBC – Public Open Space
- LBC – Transport
- LBC – Trees & Landscaping
- LBC – Urban Design
- Designing Out Crime (Metropolitan Police)
- Environment Agency
- Historic England
- Historic England – Greater London Archaeological Advisory Service
- Natural England
- Network Rail
- Sport England
- Thames Water
- Transport for London

The consultation responses received have been forwarded to the Council's independent assessor (Buro Happold) and are uploaded on the Council's website.

The Council's comments on the proposed scope of the Environmental Impact Assessment (EIA) and resultant Environmental Statement (ES), as detailed within the Scoping Report, are incorporated in the Buro Happold report. For clarity, comments have been provided on each relevant section of the scoping report. The other consultation responses on the EIA Scoping Report are also incorporated in the Buro Happold report.

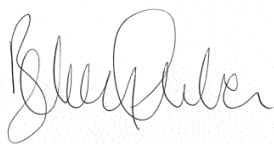
The Council would like to highlight several key points from the Buro Happold report, which should be addressed in the future Environmental Statement:

- *Section 3.3.1 – It is stated that 'approximately' 460 residential units are proposed. The Applicant should be aware that, should there be material changes to the number of the residential units proposed, or other aspects of the proposals (e.g. maximum building heights and the application site area) from the position presented here, this could bring into question the validity of the EIA Scoping Opinion and its recommendations. This could necessitate submission of a new request for a scoping opinion in the future.*
- *Section 3.3.1 – It is stated that "the Development will significantly contribute to LB Camden meeting their housing targets." Buro Happold note that this contradicts the Applicant's proposal to scope out a socio-economics chapter from the ES on the basis that no significant socio-economic effects are anticipated (Table 14.1 in Section 11 of the EIA Scoping Report states "the completed Development will contribute to meeting LB Camden's*

housing need...While beneficial, these effects are not considered significant in EIA terms”). Buro Happold presume that the statement in the Description of Development section has been made in error. However, should this not be the case and significant effects on housing targets are in fact anticipated, a socio-economics ES chapter should be scoped into the ES.

- *Section 3.8.2 – The receptors proposed to be scoped in to the assessment are set out under the Key Receptors subheading. The sensitive receptors immediately adjacent to the site all generally appear to have been included. We presume that the amenity area at Lismore Circus to the north has been excluded from the overshadowing assessment due to its distance from site and the presence of the intervening Bacton Tower. Justification for scoping out this receptor from the assessment should be provided in the ES chapter. In their consultation response, Historic England has requested that “assessment and scoping of the impact on daylight at the Church of St. Martin” is undertaken. We note that the external areas of the Church have been included as a receptor to be considered in the overshadowing assessment. Whilst we understand that churches are not routinely included in daylight/sunlight assessments; they have been requested to be scoped in on projects in London in the past. Consideration should be given to assessing internal daylight levels inside the church in the ES chapter. Should a full detailed assessment not be considered necessary, comprehensive justification should be provided.*
- *Section 3.11.2 – Justification for scoping out greenhouse gas emissions assessment from the ES has been made on the basis that the proposed development will align with existing and emerging local and regional net zero policy. It is also stated that significant increases in greenhouse gas emissions are not anticipated. A Sustainability Statement will be prepared to accompany the planning application, including a circular economy statement, carbon emissions reporting, whole life cycle carbon assessment, energy statement and an overheating assessment. Within the Sustainability Statement submission, a comprehensive review of the proposed development’s alignment with all existing and emerging national, regional and local net zero policy should be reported and it should be identified how all relevant additional mitigation measures will be secured. Should this review indicate that the proposed development does not fully align with net zero policy (resulting in significant environmental effects, in line with the IEMA Guidance), a greenhouse gas emissions ES chapter should be scoped into the ES.*

Yours faithfully,



Bethany Cullen
Head of Development Management
London Borough of Camden