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date: 05 September 2016

Fergus Freeney  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

Dear Fergus,

**TOWN & COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011 (AS AMENDED) REGULATION 26(1) REQUEST FOR EIA SCREENING OPINION:**  
**BACTON LOW RISE, GOSPEL OAK**

We write to request a Screening Opinion on behalf of the London Borough of Camden (LBC) (as landowner) in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended 2015)<sup>1</sup> (the 'EIA Regulations'), in relation to a Section 73 application which seeks to amend Phase 2 of the consented Bacton Low Rise Estate regeneration.

To inform the LBC in their screening opinion, and in accordance with the EIA Regulations, we enclose:

- A plan sufficient to identify the Site;
- A description of the existing Site and its setting (see part a); and
- A brief description of the nature and purpose of the development (see part c) and of its possible effects on the environment (see **Annex 1**).

**a) Site and Setting**

The consented development site which is the subject of the Section 73 application (the Site') is located in Gospel Oak in the London Borough of Camden, and covers a total area of approximately 1.89 ha. The Site comprises two parcels of land; the Wellesley Road District Housing Office (DHO) Site (Site 1) and the Bacton Low Rise Estate (Site 2) on Wellesley Road. The site location and boundary is provided in **Annex 3**.

Site 1: DHO Site - The DHO Site (Site 1) covers an area of approximately 0.53 ha, and is bound to the north by the railway line, to the south-west by Wellesley Road and to the south-east by Vicars Road. The consented regeneration development has been built out at this plot, with the exception of Block C and B2 which are currently under construction and are both expected to be completed in winter 2016. Further details of the consented scheme are provided below.

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<sup>1</sup> The Town and Country Planning (Environmental Impact Assessment) Regulations, consolidated with Alterations 2011, March 2015



Site 2: Bacton Low Rise - The Bacton Low Rise (Site 2) is bounded by Wellesley Road and Haverstock Road, and extends to 1.36 ha. Site 2 is occupied by residential buildings of the low rise housing estate (comprising 99 units of predominately social rented tenure) and associated landscaping, parking and hardstanding. There are eight individual blocks of development arranged around three courtyards.

A number of semi-mature trees and grassed areas are present between the blocks of flats and along the roadsides.

## **b) Background**

An EIA Screening Opinion was requested from LBC for the proposed regeneration of the Bacton Low Rise Estate and provided in July 2012 (Ref: 2012/4079/P). The proposals included 290 units and at 1.89 hectares fell within the description at paragraph 10b of Schedule 2 and exceeded the threshold of 0.5 hectares as set out in Schedule 2 of the EIA Regulations 2011 (not amended). The Screening Opinion request was accompanied by an EIA Screening Report ('2012 Screening Report'). The EIA Screening Opinion issued by LBC Council on 21 August 2012 confirmed that the proposals did not constitute EIA development and therefore EIA was not required. The 2012 Screening Report and EIA Screening Opinion are enclosed.

A detailed planning application for the Site was submitted by and approved by LBC in April 2013 (Ref. 2012/6338/P) ('2013 Permission'). This application sought approval for 290 residential units, three employment units, new and altered public realm, landscaping, vehicular and pedestrian links/accesses, vehicular and cycle parking, bin storage and associated works. The planning application was supported by a Transport Assessment, Phase 2 Geo-technical and Geo-environmental Report, Noise and Vibration Assessment, Air Quality Assessment, Flood Risk Assessment, Arboricultural Assessment, Daylight and Sunlight report and an Extended Phase I Habitat report and Bat Survey report.

A further EIA Screening Opinion was sought for works involving the addition of 4 residential units to the 290 already approved under the 2013 Permission. LBC provided an EIA Screening Opinion in April 2014 (Ref. 2014/2975/P) confirming that EIA was not required. A Section 73 application was subsequently approved by LBC in March 2016 for 294 residential units, three employment units, new and altered public realm, landscaping, vehicular and pedestrian links/accesses, vehicular and cycle parking, bin storage and associated works (Ref: 2014/3633/P). This application included a Daylight and Sunlight Addendum and an Air Quality Assessment which assessed the potential effects of the proposed energy centres.

An additional Section 73 planning application was submitted and approved by LBC in March 2015 for a tree removal and replacement strategy (Ref. 2015/1189/P) for four trees on Vicar's Road. The approved development is referred to as the 'Consented Scheme'.

## **c) Description of the Proposed Amendments**

Phase 1 (Site 1) of the Consented Scheme is complete and provides 67 new residential dwellings with associated public realm and amenity space. A plan showing the Consented Scheme is enclosed.

This EIA Screening request is submitted pursuant to proposed amendments which relate to Phase 2 of the Consented Scheme located at Site 2, where works are yet to commence. Phase 2 will be the final phase of development. The application, which will be submitted under Section 73 of the Town and Country Planning Act, will make minor amendments to planning permission Ref: 2012/6338/P (as amended by 2014/3633/P and 2015/1189/P) (the 'Consented Scheme').

The massing and footprint of the buildings will reflect the approved proposals and the red line boundary remains the same as that of the Consented Scheme with minor changes proposed to the layout.

The proposed amendments are limited to the following:

- An additional 20 residential units (2,082m<sup>2</sup> Gross Internal Area) achieved through altering of internal configuration of residential units, bringing the total number of residential units to 314 (the 2012 EIA Screening Report was for 294 residential units);
- The revised unit mix will include 22 wheelchair ready units (an increase of 3 from the Consented Scheme);
- An increase in the amount of commercial floorspace by approximately 20m<sup>2</sup> from 259m<sup>2</sup> to 276m<sup>2</sup> and relocation in the north-west of Site 2 (but still within the approved building footprint);
- One additional disabled car parking space (total of 18) and 42 additional cycle parking spaces (total of 440 across the whole development);
- Alteration to the window design and balconies layouts to accommodate the revised unit mix; and
- Removal of additional on-site trees.

For EIA Screening purposes, the amendments are considered to comprise a change to an already authorised scheme and as such are considered as part of the wider development (i.e. including Phase 1). The Consented Scheme incorporating the amendments are subsequently referred to as the Development and are subsequently referred to as the 'Development' and act as the basis for the new section 73 planning application.

#### **d) Regulatory Context**

As highlighted by the Planning Practice Guidance<sup>2</sup>, a Section 73 application is considered to be a new application for planning permission under the EIA Regulations. Since the 2012 screening appraisal was undertaken and 2012 and 2014 screening opinions issued by the Council, the screening thresholds within Schedule 2 to the Regulations were altered by amendments to the EIA Regulations in 2015. The previous threshold of 0.5 ha was amended in 2015 as follows:

- (i) *The development includes more than 1 hectare of urban development which is not dwellinghouse development;*
- (ii) *the development includes more than 150 dwellings; or*
- (iii) *the overall area of the development exceeds 5 hectares.*

The development is classified as an 'urban development project' under Schedule 2, 10(b) of the EIA Regulations and, at 314 units, exceeds threshold (ii) above.

However, in further considering Schedule 2 development and the need for EIA, paragraph 018 in the Government's online EIA guidance (ID: 4 updated 06/03/14)<sup>3</sup>, states:

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<sup>2</sup> <http://planningguidance.communities.gov.uk/blog/guidance/flexible-options/amending-the-conditions-attached-to-a-permission-including-seeking-minor-material-amendments-application-under-section-73-tcpa-1990/>

<sup>3</sup> Department for Communities and Local Government, *Planning Practice Guidance*

*"Only a very small proportion of Schedule 2 development will require an assessment.....To aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced."*

This national guidance on EIA is clear that not all proposals above the screening thresholds will automatically be subject to EIA and that each development should be considered on its own merits. When considering these 'indicative thresholds' for urban development projects, Paragraph 058 of the guidance states:

*"Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the...types of impact are of a markedly different nature or there is a high level of contamination."*

*Sites which have not previously been intensively developed:*

*(i) area of the scheme is more than 5 hectares; or*

*(ii) it would provide a total of more than 10,000 m<sup>2</sup> of new commercial floorspace; or*

*(iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings)."*

The above guidance indicates that EIA is not applicable to the Development. This takes into account the comparatively modest proposals of 314 new residential units and approximately 276m<sup>2</sup> commercial space which is significantly below these thresholds.

Notwithstanding this however, the over-riding consideration for determining whether EIA is required is by establishing whether the Development may have potentially significant effects on the environment. EIA may be required if the development is of more than local importance (i.e. will have wide-ranging environmental effects), is located within an environmentally sensitive location and is likely to result in significant effects on the environment.

Selection criteria for determining whether a Schedule 2 development requires EIA are provided in Schedule 3 of the EIA Regulations. A thorough screening appraisal is provided in **Annex 1** with reference to the criteria in Schedule 3.

## **e) Conclusion**

In 2012, LBC found that the regeneration of Bacton Low Rise Estate was not EIA development. The development is deemed an 'urban development project' under Schedule 2 to the Regulations and at 314 units exceeds (ii) above. The local planning authority must therefore carry out a new screening exercise and issue a screening opinion as to whether EIA is necessary.

In line with the EIA Regulations, we are therefore seeking a further screening opinion relating to the forthcoming Section 73 application which will amend the Consented Scheme. The potential effects of the Consented Scheme (as amended by the Section 73 application) have been considered in a comprehensive Screening Appraisal (Annex 1). This appraisal concludes that the Development is unlikely to have significant environmental effects. The proposed amendments to the Consented Scheme are not considered to materially change the conclusions provided in the EIA screening appraisal and request submitted in July 2012 as part of the original application. As such, we do not consider an EIA to be necessary in respect of the forthcoming Section 73 application.

We therefore request a formal Screening Opinion under Regulation 26(1) of the EIA Regulations 2011 as to

whether you agree that EIA is not necessary for the Section 73 application, taking into consideration the above information. In line with the EIA Regulations the Council has a duty to give reasons for negative screening decisions.

We look forward to hearing from you within the statutory timescale of three weeks from receipt of this screening request. Should you require any further information, please do not hesitate to contact me or Elin Fradgley (Director).

Yours sincerely



Alistair Walker  
Consultant

Enc.

**Annex 1.** EIA Screening Appraisal

**Annex 2.** 2012 and 2014 LBC EIA Screening Opinions

Decision Ref 2012/4079/P (2012 LBC Screening Opinion)

Decision Ref 2014/2975/P (2014 LBC Screening Opinion)

**Annex 3:** Development Proposals Plan

## **Annex 2: EIA Screening Appraisal**

### **a) Introduction**

This section provides an appraisal of the Development, considering Schedule 3 criteria of the EIA Regulations (selection criteria for screening Schedule 2 development). This appraisal considers the characteristics of the Development, the environmental sensitivity of geographical areas likely to be affected by the Development, and the potential for significant effects.

The Site is approximately 1.89 ha. The Development would be contained within the Site boundary as shown in Figure 1 and comprises a low to medium-rise development (3 to 7 Storeys), in-keeping with the prevailing urban townscape of the wider Gospel Oak area.

### **b) Use of Natural Resources**

Redevelopment of the Site would, by its very nature, require the use of a range of natural and man-made construction materials to complete the build and fit-out of the scheme. However, materials to be used in the development will be chosen using the BRE Green Guide to Specification and the Green Guide to Housing Specification. In addition, an 'Energy and Sustainability Report Update' will be prepared and submitted with the Section 73 application.

### **c) Production of Waste**

Demolition of the existing building on-site and construction of the Development will inevitably produce some waste. However, the amount of waste going to landfill will be minimised, so that construction materials will be used efficiently on site, and that all re-useable wastes will be recovered, re-used or recycled wherever possible.

A waste and recycling strategy for the Development will be described in the Updated Design and Access Statement, which will include a description of the waste and recycling storage facilities to be provided. Condition 47 of the existing permission requires a Construction Management Plan (CMP) to ensure the construction phase of the Development can be carried out safely and with minimal possible impact on and disturbance to the surrounding environment. The CMP must include a waste management strategy for handling and disposing of construction waste.

### **d) Transport**

The Site is located in a desirable location in terms of transport links, and has a Public Transport Accessibility Rating (PTAL) of 4+.

The Development replaces the existing estate and will not generate significant volumes of additional traffic on the local highway network, as it will be largely car-free, with the exception of disabled car parking spaces and replacement car parking spaces for existing residents of the Estate. As such, the effects of the Development are not considered to be significant.

A Transport Assessment Update will be submitted with the application, which will assess the impacts of the Development on the local transport network. It will also detail disabled parking, cycle parking and servicing to address the relocated commercial units and include a detailed PTAL assessment. A Cycle Storage

Statement will also be provided in the DAS to demonstrate that the Development is able to provide the revised number of cycle storage spaces required, where they will be located and the type that will be proposed.

*e) Noise and Vibration*

The Site lies within a predominantly residential area. The ambient noise environment is likely to be dominated by train noise from the railway forming the northern boundary of the DHO Site.

A baseline noise assessment was undertaken in October 2012<sup>4</sup> to establish the noise climate of the Site to determine its suitability for residential development, and to inform mitigation measures and noise limits in terms of fixed plant and the proposed combined heat and power (CHP) plant. This was submitted with the 2013 planning application.

There is likely to be increased noise during the demolition and construction works, including noise resulting from construction vehicles. The on-site residential receptors throughout the de-canting phase, and nearby adjacent residents of Bacton High Rise, will be sensitive receptors throughout the demolition and construction phase.

A number of measures will be implemented to reduce noise effects during the demolition and construction phase, including acoustic screening/site hoardings, the selection of appropriate construction techniques and the restricted operation of certain plant and activities to agreed hours. A Construction Environmental Management Plan (CEMP) will also be implemented to minimise such impacts.

As the Development will only provide a small number of disabled car parking spaces, it will not result in a significant net increase in traffic over and above existing levels associated with the current operational use of the Site. The redevelopment proposals will therefore not give rise to significant traffic-related noise impacts.

Noise survey data has been used to set noise limits for the proposed plant. Combined glazing systems will ensure that the good internal noise criteria set out in BS 8233 are met and outdoor garden noise levels will be compliant with BS 8233:1999 criteria.

As such, it is not considered that there will be significant noise and vibration effects as a result of the Development.

*f) Air Quality*

LBC has declared the whole borough as an Air Quality Management Areas (AQMA) for annual average nitrogen dioxide (NO<sub>2</sub>) concentrations and long term and short term particulate concentrations (PM<sub>10</sub>).

During the construction phase of the Development, the greatest potential air quality effects relate to dust nuisance which would largely be contained to within 200 metres, or less, of the Site perimeter. There is the potential for occasional short term incidents of windblown dust arising from materials handling and plant.

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<sup>4</sup> Peter Brett Associates, 2012, *Bacton Low Rise Noise and Vibration Assessment*, October 2012

However, through the appropriate use and siting of equipment and by adopting other good site practice in terms of mitigation measures, the potential effects will be not be significant.

As mentioned previously, the Development will be largely car-free, and therefore is not expected to have a significant impact on local air quality as a result of traffic-related emissions.

While the Site is in close proximity to a railway track, analysis carried out by Peter Brett Associates (PBA) in October 2011<sup>5</sup> and submitted with the 2013 Application demonstrated that concentrations of NO<sub>2</sub> and PM<sub>10</sub> are predicted to be below the objectives at all worst-case locations within the Development.

The character of use would not change significantly as a result of the proposals and the Development will release pollutants or any hazardous, toxic or noxious substances into the air.

As such, it is not considered that there would be any significant air quality effects as a result of the Development.

#### *g) Landscape and Visual*

The Site and its immediate surroundings are characterised by predominately residential accommodation. The immediately adjacent Bacton High Rise is 22-storeys and is therefore locally prominent, compared to the surrounding urban fabric which typically comprises 2-4 storey Victorian properties.

#### *Townscape Character*

The Site is not located in a Conservation Area. The townscape of the Site and its immediate surroundings is considered to be of medium sensitivity. Sensitivity increases with distance from the Site due to the smaller-scale built fabric and the presence of designated areas.

The existing buildings on the Site are consistent with the general scale and character of the area, but are not particularly notable.

The Development will range from 3 -7 residential storeys, which is of a similar height to the existing buildings on-site and in the immediate vicinity. The surrounding townscape is relatively robust and is already influenced by the taller Bacton High Rise immediately north of Bacton Low Rise, and other housing estates to the west and south. As a result, the area can accommodate change of this order without detriment to its character, and the effect is not considered to be significant.

#### *Setting of Cultural Heritage Assets*

The Development will be visible from the adjacent Grade 1 listed St. Martins Church and Grade II listed St. Martin's Hall and/or their curtilage. However, views from these assets currently experience the existing buildings on the Site, and the Development will not be of a significantly different scale or mass, to adversely affect the relationship between these assets and the Site. The approach to the design responds to the St. Martins Church setting, incorporating the listed structure into the centre of the proposed network of

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<sup>5</sup> Peter Brett Associates, 2011, *Bacton Estate Air Quality Assessment*, October 2011



streets and open space, to become a focus for the surrounding neighbourhood. As a result, the effects on these assets are not considered to be significant.

### *Views and Landmarks*

Views from locations such as Hampstead Heath and Parliament Hill to the north are unlikely to be affected by the Development - this is an expansive urban view already punctuated by taller buildings, including the Bacton High Rise, and the Development will be of a similar scale to the existing buildings on-site. In addition, the Site does not lie within any of the strategic views identified in the London View Management Framework, including designated views 'Parliament Hill: the Summit close to the orientation board – looking towards St. Paul's Cathedral' and 'Parliament Hill: east of the summit – at the prominent Oak tree – looking towards Westminster', which fall to the east of the Site and 'Parliament Hill: summit to the Palace of Westminster', which falls just outside the western boundary of the Site. Overall, the effects on designated views are not anticipated to be significant.

### *Visual Amenity*

A number of local residents are likely to see the Development from their homes, and are conventionally considered to be of high sensitivity. However, affected views will already be urban in character and likely to be influenced by features such as Bacton High Rise. Except at close range, the Development is unlikely to change the character of such views to a fundamental degree, and its effects on private amenity are not anticipated to be significant.

The Development may also be seen from a range of public viewpoints within open space in the surrounding area, including Lismore Circus to the north and Hampstead Heath further north. Whilst views from open space are potentially of high amenity value, and users of such areas are considered to be of high sensitivity, these views are already urban in character. The effect on amenity is therefore not considered to be significant.

### *h) Ground Conditions and Contamination*

The British Geological Survey (BGS) map for the area, Sheet 256 'North London' (1: 50,000) shows the Site and surrounding land to be underlain by the London Clay Formation, and is likely to be at least 30m thick. The London Clay is a Non-Aquifer (described by the Environment Agency as comprising 'Unproductive Strata'). This will effectively provide an impermeable barrier to any contaminants in the ground. There are no superficial deposits of Aluminium or Glacial material or other outcropping strata shown within at least 750m of the Site.

A Phase 1 Geo- Environmental Desk Study was undertaken by Rolton Group Ltd. in May 2012<sup>6</sup> which informed the initial screening appraisal, while a Phase 2 Geo-Technical and Geo-Environmental Study<sup>7</sup> was carried out in October 2012. These were submitted within the 2013 Application.

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<sup>6</sup> Rolton Group Ltd, 2012, *Phase 1 Geo-Environmental Desk Study*, May 2012

<sup>7</sup> Rolton Group Ltd, 2012, *Phase 2 Geotechnical and Geo-Environmental Report*, October 2012

The made ground at the Site may have some potential for persistent contaminants, although there appears to be a very low risk to controlled waters or neighbouring properties. The results of the studies indicate there should be no significant geo-environmental obstacles to redevelopment of the Site. At present, no remediation or mitigation measures are considered necessary with respect to the presence of hazardous ground gases at the Site.

Contamination and remediation issues were addressed through planning conditions attached to the Consented Scheme. With appropriate measures required by regulatory provision and standard condition wording, no significant effects are anticipated from ground conditions or contamination.

*i) Ecology*

There are no Sites of Special Scientific Interest (SSSI) or similar locations with statutory protection within close proximity of the Site – the nearest is a Local Nature Reserve just over 500m from the Site.

An Ecological Extended Phase 1 Habitat and Protected Species Survey was undertaken by Greengage Environmental LLP in July 2012 to establish the ecological value of the Site and its potential to support notable and/or legally protected species. Due to the potential for foraging bats to be present (in particular in the north of the Site, near the railway line and Lismore Circus) a bat foraging survey was undertaken in August 2012. These were submitted within the 2013 Application.

In order to confirm the current ecological value of the Site and specifically assess the baseline conditions for Phase 2, a Preliminary Ecological Appraisal of the Phase 2 site was undertaken in March 2016. The results of this survey have informed this screening appraisal, and are summarised below.

The Site consists of low rise residential blocks with associated hard and soft landscaping. Details received from desktop study and site walkover undertaken has confirmed the Site has the following potential for legally protected species:

- Nesting Birds – Low;
- Invertebrates – Negligible;
- Badgers – Negligible;
- Great Crested Newts – Negligible;
- Dormice - Negligible
- Otters – Negligible;
- Water Voles – Negligible;
- Reptiles – Negligible;
- Bats foraging – Low; and
- Bats roosting – Negligible.

The baseline data indicates that the most important impacts would therefore be those potentially affecting bats and common breeding birds, with confirmed presence of loafing pigeon.

In terms of nesting birds and vegetation clearance required to implement the proposals, these activities will be undertaken outside the bird nesting season (March – October). In terms of effects on bat foraging, it is determined that any loss of habitat can be mitigated through replacement habitats and enhancements (bat boxes) in the final proposal plans. As such, the Development will not result in any significant ecological effects.

An ecological appraisal of the Development, including the Extended Phase 1 Habitat Survey and Protected Species Surveys will be submitted as part of the planning application documentation to validate the baseline conditions as outlined in the previously submitted reports.

*j) Arboriculture*

A Tree Survey, Implications Assessment and Constraints Report<sup>8</sup> was prepared in November 2012 and submitted with the 2013 Application. This assessed the arboricultural value of the trees on-site and in close proximity to the Site boundary and outlined mitigation measures that would be required for any tree removal.

Subsequently, a Tree Removal and Retention Strategy was submitted with the March 2015 Section 73 application for the removal and replacement of four plane trees on Vicars Road.

The Section 73 application will likely seek consent for the removal and replacement of additional trees. An Arboricultural Assessment will be provided with the application to outline how the proposals differ from the approved details and what mitigation measures and safeguards will be put in place to ensure that there will not be any significant effects as a result. These effects however are not expected to be significant in EIA terms.

*k) Socio-Economics*

The proposed redevelopment of the Bacton Low Rise Estate would deliver new high quality housing and create a new mixed tenure community. The existing Estate suffers from issues such as deterioration in the built fabric of the development leading to poor living conditions, overcrowding and under occupation. The first phase of the development was the redevelopment of the DHO Site. This allowed for the first wave of reallocations from the existing Bacton Low Rise Estate.

Any impact of the proposals would be positive in relation to the residential population and delivery of housing. Any additional demand for social infrastructure, particularly education as a result of the increase in population on-site, would be mitigated through financial contributions made through the Community Infrastructure Levy payment and the section 106 agreement as part of the planning application.

The proposals subject of the planning application would not require a socio-economic environmental impact assessment. Any potential impact on existing residents and businesses, or increased demand for social infrastructure will be dealt with via the Section 106 agreement and Decanting Strategy already in place.

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<sup>8</sup> Greengage, 2012, *Tree Survey, Implications Assessment and Constraints Report*, November 2012

In summary, the Development would create new and replacement homes and replacement employment space. The main socio-economic impacts of the Development are therefore likely to be beneficial, although these are not considered to be significant in EIA terms.

#### l) *Water Resources and Flood Risk*

A Flood Risk Assessment<sup>9</sup> was submitted with the 2013 Application. This identified nearby water resources and flood risk receptors and provided analysis of the potential of flooding for the Site and surrounds.

The nearest surface water feature is an open-air swimming pool at the southern end of Hampstead Heath, approximately 400m north of the Site.

The Site is not located within a groundwater Source Protection Zone. The nearest water abstraction is recorded as over 800m from the Site. Significant groundwater is unlikely to be present at shallow depth as a result of the buried services and railway cutting in the vicinity.

The Development is therefore not expected to have a significant impact on surface water features or groundwater.

The Site is located in Flood Zone 1 and as such at a low risk of fluvial and tidal flooding. The Site is also not located within an area at risk of reservoir flooding.

As the proposed impermeable area is to be larger than the existing impermeable area, the volume of discharge is critical for the Bacton Low Rise Site and as such the 2012 design (provided within the 2013 Permission) proposed to provide two separate storage systems on-site. The larger storage tank to the east of the Site would provide storage for the long term discharge and the smaller tank to the north of the Site would provide storage for the short term storage. The detailed drainage design for the scheme has been designed such that the peak flow and the volume of discharge are not increased. As such, the Development would not have a significant effect on surface water flooding and discharge.

Condition 35 of the 2013 Permission requires that *“The development hereby approved shall be implemented in accordance with the measures outlined in the Flood Risk Assessment by Rolton Group Limited Ref 12-0083 XRP003 Rev A dated November 2012 and Email from Rolton Group Limited to Environment Agency dated 17/12/2012.”* As such, it was agreed through pre-application consultation with LBC that a new Flood Risk Assessment would not be submitted with the Section 73 application, despite the Site’s area being greater than one hectare. This is due to the fact that the Site is not within any flood risk zones and any design carried out to meet current sustainable drainage (SuDS) standards for Phase 2 will better the figures given in the original assessment.

Notwithstanding, an indicative Drainage Strategy will be submitted in support of the application. This will provide an update on the design proposals and confirmation that the discharge will not increase as a result of the Development. The final Drainage Strategy will be submitted to and approved by LBC through a planning condition.

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<sup>9</sup> Rolton Group Ltd., 2012, *Flood Risk Assessment, Bacton Low Rise Redevelopment, Camden*, November 2012

m) *Archaeology*

The Camden Core Strategy<sup>10</sup> does not identify the Site as having well-preserved archaeological heritage and it does not fall within any of the thirteen archaeological priority areas designated in the borough.

The Site is likely to be underlain by made ground and disturbed ground as a result of development over the past 150 years. The made ground is likely to be variable in content across the Site due to a history of past development and redevelopment and old basements, foundations and other buried features may be present as part of former buildings. It is anticipated that any significant disturbance to archaeological deposits and/or features is likely to have occurred during construction of the former low-rise terraced housing, old workshops and school building between 1855-1872, and the redevelopment of the Site in 1960s/early 1970s for the current estate. The redevelopment proposals are therefore not expected to have significant impacts on archaeology.

n) *Microclimate: Daylight and Sunlight*

The proposed scheme is of a similar scale to the existing buildings on the Site and the microclimatic effects of the Development on nearby receptors are therefore likely to be similar.

A Daylight and Sunlight report and Addendum report were completed in November 2012<sup>11,12</sup> and submitted with the 2013 Application. This confirmed that residual levels of daylight on neighbouring properties will be adequate and no single room will be left with a level of amenity that will not be sufficient for the continued use and enjoyment of that room. In regards to the habitable rooms of the Development, the new dwellings will receive adequate amounts of daylight. Rooms that have recessed private amenity balconies receive lower levels of internal daylighting. On this basis, the effects of the Development are not considered to be significant.

A stand-alone Sunlight and Daylight report will be submitted with the Section 73 application, which will confirm that the Development does not create any significant daylight/sunlight effects (both for the proposed and existing nearby properties) and confirm that there are no issues arising from changes to any previously approved units.

o) *Microclimate: Wind*

The Development is of a similar scale to the existing buildings on and in the vicinity of the Site, generally reaching 3, 4 and 5 storeys in height and extending to a maximum of 7-8 storeys at ridge height on Haverstock Road. As such, the microclimatic effects of the Development on nearby receptors are therefore likely to be similar to existing conditions and the proposals are not expected to create and significant effects.

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<sup>10</sup> London Borough of Camden, 2010, *Camden Core Strategy*, November 2010

<sup>11</sup> GVA, 2012, *Bacton Low Rise Daylight and Sunlight Report*, November 2012

<sup>12</sup> GVA, 2012, *Bacton Low Rise Addendum Daylight and Sunlight Report*, November 2012

*p) Cumulation with other Development*

A number of planning applications have been identified in the vicinity of the Site that have the potential to have cumulative effects with the Development. These are described in turn below:

- Ref: 2014/6903/P: Granted consent in December 2014 and currently under construction, this development is approximately 460m to the west of the Site boundary. Erection of part 5, part 7 storey building comprising 72 residential flats with associated amenity space and landscaping.
- Ref: 2014/6845/P: Granted consent in November 2014. Approximately 630m north-west of the Site boundary. Erection of a new 7 storey building at the Royal Free Hospital. This is to be used for laboratory/research space, a patient hotel, offices, amenity space and a replacement carpark of 58 spaces.
- Ref: 2014/6697/P: Granted consent in March 2016. Approximately 120m to the north-east of the Site boundary. Partial redevelopment of Kiln Place. Demolition of existing building and construction of 15 new residential units.

There is some potential for effects to arise during the construction phase of these developments and the Development, particularly associated with transportation and access, air quality, noise and vibration. However, these effects would be of a temporary nature, and it is expected that a Construction Environmental Management Plan (CEMP), would be implemented and operated by the contractor at these committed developments sites, similar to the Development site, such that significant cumulative construction impacts are not expected. It is not expected that significant cumulative effects would arise once the developments are completed due to the scale and use of the developments and respective distances from the Site.

*q) Risk of Accidents*

The demolition of existing buildings and construction of the Development will be undertaken in accordance with current health and safety regulations and guidance, in order to minimise the risk of accidents.

The operation of the Development will not include the use of particularly hazardous substances or technologies, and therefore the risk of accidents is considered to remain neutral.

**Annex 2: Previous LBC EIA Screening Opinions**

Poppy Carmody-Morgan  
Quod  
Ingeni Building  
17 Broadwick Street  
London  
W1F 0AX

Application Ref: **2014/2975/P**  
Please ask for: **Jonathan Markwell**  
Telephone: 020 7974 **2453**

29 April 2014

Dear Sir/Madam

## **DECISION**

Town and Country Planning Act 1990 (as amended)  
Town & Country Planning (Development Management Procedure) Order 2010  
Town & Country Planning (Environmental Impact Assessment) Regulations 2011

### **Request for Screening Opinion EIA Not Required**

Address:

**Bacton Low Rise**  
**113a Wellesley Road**  
**115 Wellesley Road**  
**117 Wellesley Road and Workshops at 2-16 Vicar's Road**  
**Gospel Oak**  
**London**  
**NW5 4**

Proposal:

Request for Environmental Impact Assessment (EIA) Screening Opinion for works involving the proposed regeneration of the Bacton Low Rise Estate and Wellesley Road District Housing Office (DHO) site.

Drawing Nos: Site Location Plan; Letter by Quod dated 25/04/2014 Ref Q30150;  
Environmental Impact Assessment Screening Report dated 31/07/2012 Ref Q30204.

The Council has considered your application and offers the following opinion:

The proposal falls within the description at paragraph 10b of Schedule 2 and exceeds the threshold of 0.5 hectares in column 2 of the table in Schedule 2 of the 2011 Regulations.



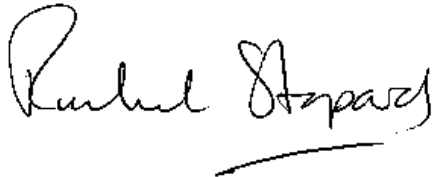


Therefore the Council considers the proposal to be 'Schedule 2 development' within the meaning of the 2011 Regulations. Accordingly, the Council has considered if the proposed development is likely to have significant effects on the environment. In determining such effects, the Council has taken into account the criteria for screening Schedule 2 development set out in Schedule 3 of the Regulations. These are the characteristics of the development, its location and the characteristics of the potential impact.

Based upon the description of the development provided and the information provided in your submissions received 28 April 2014, the development is not considered to be likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

Accordingly, in exercise of the powers conferred by regulation 5(5) of the 2011 Regulations, the Council hereby considers that the proposed development described in your request and the documents submitted with it, is not 'EIA development' within the meaning of the 2011 Regulations.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Rachel Stopard', with a horizontal line underneath.

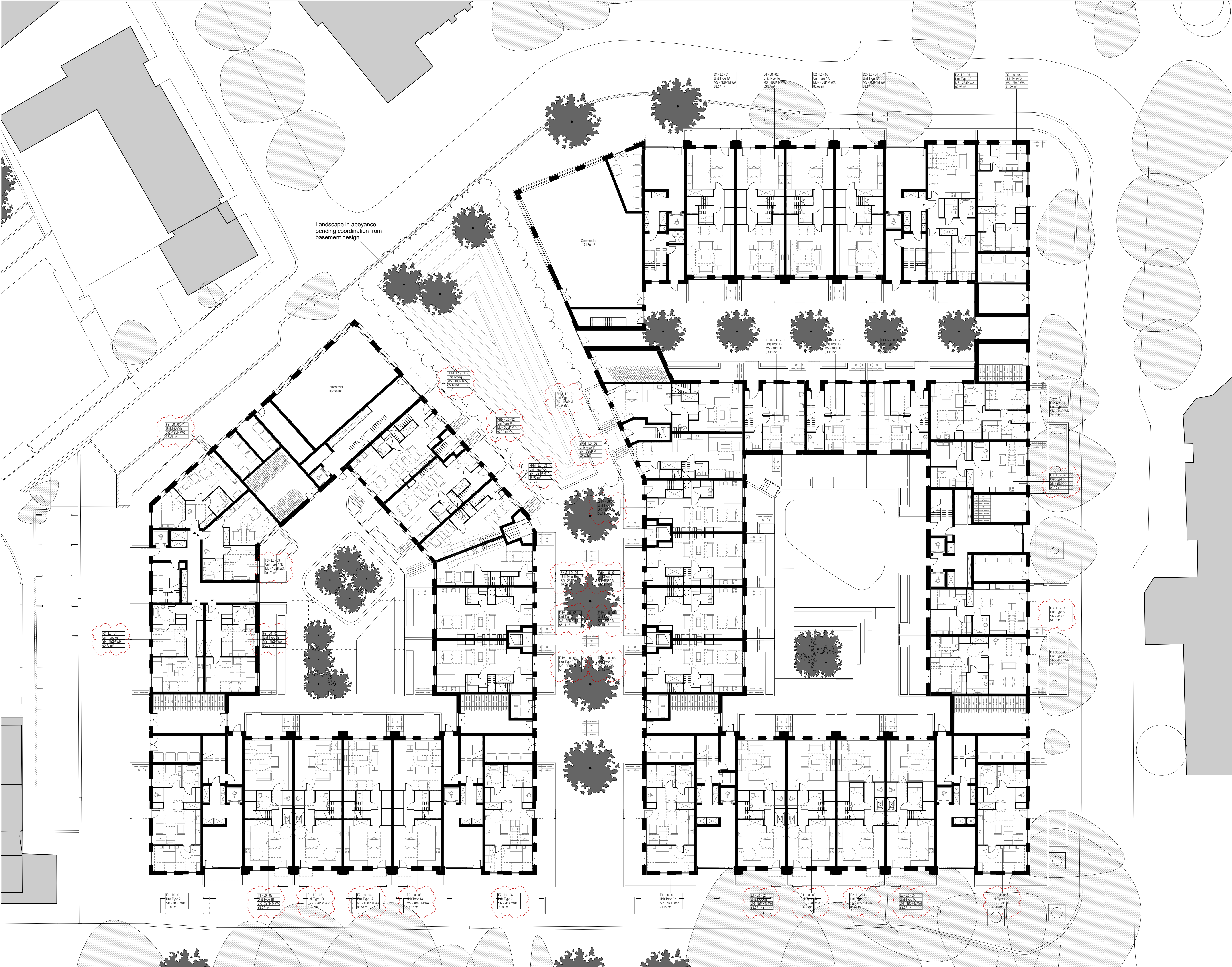
Rachel Stopard  
Director of Culture & Environment

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It is important to us to find out what our customers think about the service we provide. To help us in this respect, we would be very grateful if you could take a few moments to complete our [online planning applicants' survey](#). We will use the information you give us to monitor and improve our services.

**Annex 3: Development Proposals Plan**





CLIENT

London Borough of Camden

DO NOT SCALE FROM THIS DRAWING.

THIS DRAWING IS BASED ON DIMENSIONAL SURVEY INFORMATION PROVIDED BY OTHERS. THE ARCHITECT CANNOT ACCEPT RESPONSIBILITY FOR THE ACCURACY OF THIS SURVEY INFORMATION.

ALL DIMENSIONS ARE SHOWN IN METRIC.

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NOTES

INDICATIVE SITE BOUNDARY

Unit Tag Key:

D1 - L0 - 01

Unit Type 1

SR - 1B2P

50.00 m2

Building ID - Level - Unit Number

Unit Type

Tenure - Occupancy

Unit Area

Tenure Types:

MS: Market Sale

SR: Social Rent

INT: Intermediate Rent

4	Stage 02 Formal Issue	17/08/2016
3	Stage 02 Issue	12/08/2016
2	Amendments Following PPA 02 Meeting	29/07/2016
1	Unit Tags Updated	12/07/2016
Rev	Reason for Issue	Date

Karakusevic Carson Architects

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The Biscuit Factory  
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London SE16 4DG  
mail@karakusevic-carson.com | 0207 566 6300

PROJECT

Bacton Low Rise Phase 2

TITLE

Bacton Phase 2 Proposed Ground Floor Plan

DRAWING NUMBER	307-A-D-100-00	REVISION	4
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STATUS

For Information

REVISION DATE	DRAWN BY	SCALE
17/08/2016	MC	1:200 @ A1
FIRST ISSUED	CHECKED BY	PROJECT NUMBER
08/07/2016	CH	307



