

TAH/DF/DP4129

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Dear Mr Sexton,

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011 (AMENDED 2015) REGULATION 5 – REQUEST FOR A SCREENING OPINION FROM THE LONDON BOROUGH OF CAMDEN FOR THE 1 TRITON SQUARE AND ST ANNE’S CHURCH BUILDINGS, LONDON.

We write to request a Screening Opinion on behalf of British Land Property Management Limited (the ‘Applicant’) in accordance with Regulation 5(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (amended 2015) (the ‘EIA Regulations’), regarding development at 1 Triton Square and St Anne’s Church, London (hereafter referred to as the ‘Proposed Development’). In relation to this and in accordance with Regulation 5(2) we enclose:

- A plan sufficient to identify the Site (refer to Appendix A);
- A description of the existing Site and its setting; and
- A brief description of the nature and purpose of the development and of its possible effects on the environment.

The Site and its Setting

1 Triton Square occupies a 1.15ha site at the heart of Regents Place and consists of a 6 storey office building with retail and gym uses at ground floor. It is neighboured by 10 Brock Street to the east, 2 Triton Square to the south and the estate substation, Diorama Theatre and 1 Osnaburgh Street to the west. The building’s north elevation faces onto Longford Place with Regents Park Estate beyond.

St Anne’s Church is located immediately to the north west of the 1 Triton Square building and consists of a 2/3 storey church building. To the west lies Laxton Place with residential uses and the Grade II* Listed St Mary Magdalene Church. Immediately to the north lie further residential uses within the Regents Park Estate whilst to the north east and east lies Westminster Kingsway College.

The buildings are highly accessible with multiple transport links in close proximity, including London Underground services at Great Portland Street 50m from the south west corner of the estate and Euston Square 150m from the south east corner of the estate. Both these station



provide access to the Circle, Hammersmith & City and Metropolitan Lines. Warren Street London Underground station is located 50m from the south east corner of the estate providing access to the Northern and Victoria Lines.

The area is very well placed in terms of road network connections. The southern edge of the estate borders the Euston Road which runs east-west across London connecting the M40 motorway and A40 with central London with numerous bus services running along these routes.

The Proposed Development

The Applicant intends to submit a full planning application for the extension of the existing 1 Triton Square office building by three storeys for office use, affordable workspace, retail and the reprovision of the gym at ground floor. St Anne's Church is proposed to be demolished and replaced with an affordable residential building of part 6, part 9 storeys.

The Proposed Development is currently being finalised but the following development quantum is proposed:

- Uplift of 15,500 sqm GIA of commercial space (B1) within 1 Triton Square;
- Uplift of 150 sqm GIA of retail space (A1) within 1 Triton Square; and
- Provision of 22 affordable housing units on the St Anne's site (Approximately 2,500 sqm GIA of C3).

The Proposed Development is expected to be car free and no car parking will be provided on-Site apart from accessible spaces where required.

Consideration of the EIA Regulations

In accordance with the EIA Regulations, the Local Planning Authority (LPA) should determine whether the project is of a type listed in Schedule 1 or Schedule 2. If the proposals fall into Schedule 1 an EIA will always be required. If the proposals fall into Schedule 2, then it is for the LPA to consider whether it is likely to have significant environmental effects.

The Proposed Development, as listed above, does not fall into any of the categories listed in Schedule 1 of the EIA Regulations.

The Proposed Development does, however, fall into the criteria of an 'urban development project' within Schedule 2 because the development site is in excess of 1ha.

For all Schedule 2 developments the Local Authority must make its own formal determination of whether or not an EIA is necessary for the proposed development by virtue of its size, nature and location. It is important to note that the National Planning Practice Guidance states that "Only a very small proportion of Schedule 2 development will require an assessment". In making this determination the Local Authority must take into account the relevant 'selection criteria' set out in Schedule 3 of the Regulations to determine the possibility of significant adverse effects on the local environment. Each case should be considered on its own merits and in a balanced way.

Consideration of Schedule 3 Criteria

Schedule 3 of the EIA Regulations set out the screening criteria in relation to Schedule 2 developments, drawing attention to the character and complexity of impacts resulting from the scheme as well as a range of issues relating to the sensitivity of the Site. The selection criteria set out in Schedule 3 of the EIA Regulations that are relevant to the Proposed Development, must be taken into account and the following should be considered:

- The development will be mixed use (with active uses on the ground floor) which are considered appropriate within the surrounding context;
- The site is within a sustainable location (with a PTAL rating of 6b) – in close proximity to transport links, schools and other associated amenities;
- The proposals will not produce any significant waste, pollution or nuisances;
- The proposals are not located in environmentally sensitive locations and will not cause negative impacts for waste generation;
- The site is a previously developed brownfield site with the 1 Triton Square building being extended rather than demolished and rebuilt;
- The site is not of historical, cultural or archaeological significance; and
- The design has been carefully considered and consultation with LBC and key third party stakeholders will be ongoing.

The key environmental considerations associated with the proposed development are summarised below to aid LBC in reaching a screening decision.

Use of natural resources

Redevelopment of the Site would, by its very nature, require the use of a range of natural and manmade construction materials to complete the build and fit-out of the Proposed Development. However, materials will be chosen to be as environmentally friendly as possible.

A 'Sustainability Statement and Energy Report' will be prepared and submitted with the planning application that will outline the sustainability and energy efficiency credentials of the Proposed Development and will set out how the proposals respond to the sustainability planning policies.

Production of waste

The demolition of the existing St Anne's Church and construction of the Proposed Development will inevitably produce some waste. However, materials will be recovered, re-used and recycled wherever possible to minimise the amount of waste going to landfill. Furthermore, the 1 Triton Square building is being extended rather than demolished and rebuilt which will result in far less waste being produced. Based on this information, no significant environmental effects are expected.

A 'Waste and Servicing Plan' will be prepared for the Proposed Development which will outline a framework for the sustainable management of waste streams and the quantities and types of waste associated with the operational phase in line with objectives and targets outlined in national, regional, district and local planning policy.

Pollution and nuisances



When considering pollution and nuisances, particular consideration needs to be given to any changes in road traffic attributable to the Proposed Development and associated emissions to air (specifically noise and air quality). This is considered in further detail below.

Traffic and transport

Due to the accessibility of nearby public transport routes it is not expected that there will be a significant impact on the existing highway network during the operation of the Proposed Development as public transport will be the preferred mode of transport.

During demolition and construction, there will be a minor increase in heavy goods vehicles (HGVs) servicing the Site, however in the context of existing high traffic levels on the local highway network, this is considered to be insignificant.

A Transport Assessment and associated Travel Plan will be prepared and submitted in support of the planning application. The Transport Assessment and Travel Plan will outline the highway and local transport network considerations of relevance and will address any highway or network implications as a result of the Proposed Development. On the basis that the Proposed Development is expected to be car free (removal of 65 existing spaces) and due to the Site's PTAL rating of 6b, no significant highway or transport network effects are anticipated.

Noise

The Site is located on Longford Street and in close proximity to the A501 (Euston Road) therefore the ambient noise environment is likely to be dominated by road traffic noise from the surrounding highway network.

There is likely to be increased localised noise during the demolition and construction works, including noise from demolition and construction vehicles and plant and equipment.

A number of measures will be implemented on Site to reduce noise effects during the demolition and construction phase prior to works starting on site, primarily through the implementation of a Construction Management Plan (CMP) and the use of best practice methods associated with development of this type.

The Proposed Development will be car free and the Site benefits from good public transport links in close proximity. The Proposed Development is therefore not expected to give rise to significant traffic related noise impacts.

Air quality

The entire borough is designated as an Air Quality Management Area (AQMA) due to existing exceedances of recognised standards for Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀).

As the Proposed Development will be car free, there is no potential for a significant impact on local air quality as a result of traffic related emissions during the operational phase.

It is not considered that the Proposed Development will release pollutants or any hazardous, toxic or noxious substances into the air.

The Energy Strategy for the Proposed Development has not yet been finalised; once the size and type of plant is known, the potential for air quality impact will be considered and emissions modelled and reported in a stand-alone air quality report that will be submitted in support of the planning application.

The risk of accidents

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

Other potential impacts

There are a number of environmental topics that are not considered within Schedule 3 criteria of the EIA Regulations. The follow sections consider the characteristics of the Proposed Development, the environmental sensitivity of geographical areas likely to be affected by the proposals, and the potential for significant effects in respect to these topics.

Townscape, Visual Impact and Built Heritage

The Site is located within the London View Management Framework (LVMF) Assessment Point 2A.2 from Parliament Hill to the Palace of Westminster. The proposals have been designed to sit below the viewing plane and thus not affect the protected view.

The Proposed Development is nearby some heritage assets but does not come in to direct contact with any. The Proposed Development can be viewed in the setting of the Grade II* Listed St Mary Magdalene Church, the Grade II Listed St Mary Magdalene School Annexe and the Regents Park Conservation Area. The setting of these listed buildings and the Conservation Area is characterised by large, central London buildings in a variety of uses. These proposals would add to the setting but make a de minimis impact on them.

With regard to townscape views, the Proposed Development will be seen from a number of different locations. However, the context of these views is one of a dense central London district where these proposals sit comfortable as part of the streetscape.

To demonstrate the above, a Townscape, Heritage and Visual Impact Assessment will be prepared and submitted in support of the application.

Socio-economics

The Proposed Development will create a high quality mixed use scheme which will deliver new jobs and improve the public realm. A Socio-Economic Assessment will be submitted with the application.



Ground conditions

The historic use of the Site and the immediate surrounding area suggests that there is limited potential for contamination. Furthermore, the Proposed Development land use will be unlikely to release pollutants onto groundwater or into nearby surface waters due to the minimal works below ground level. No ground conditions related impacts are therefore anticipated.

Archaeology

The Site is not in an Archaeological Priority Area. Furthermore, any significant disturbance to archaeological deposits and/or features is likely to have occurred during the construction of the existing buildings, from piling and construction of the foundations. It is therefore considered likely that the Proposed Development will have limited impact on any belowground archaeological deposits and/or features. In conclusion, potential for significant archaeology to be encountered with associated adverse effects is unlikely.

Water Resources and Flood Risk

The Site is not located within a Flood Risk Zone. The Proposed Development will include a Surface Water Drainage Proforma for each of the buildings.

No other significant effects associated with water resources are likely to occur as a result of the Proposed Development.

Ecology

The Site comprises mostly buildings and hardstanding. The Site is not expected to be of high ecological value due to the lack of connected green space and the on-going disturbance on-Site from existing activities. It is therefore expected that the Proposed Development will have no significant impact on the ecology of the local wildlife site. An Arboricultural Statement will be prepared and submitted with the planning application.

Conclusion

In summary, potential environmental effects associated with traffic, noise, air quality, townscape, socio-economics, ground conditions, archaeology, water resources and ecology resulting from the Proposed Development are not anticipated to be significant.

This conclusion will be further validated by the topic-specific reports and other materials submitted in support of the planning application.

In accordance with the EIA Regulations, this screening opinion request has given due consideration to the nature of the Proposed Development, its location and the sensitivity and characteristics of the prevailing environment. This demonstrates that the proposals will not result in any significant adverse environmental effects and, as such, EIA is not warranted in this case.

The Site is not considered to be particularly sensitive to development and any environmental impacts and resultant effects are unlikely to be significant, complex or widespread. In these and

all other respects, while the proposal is a Schedule 2 development it cannot be said to trigger the thresholds which would indicate that EIA is necessary.

We therefore request a formal screening opinion from the London Borough of Camden under Regulation 5 of the EIA Regulations as to whether you agree that EIA is not necessary in this case, taking into consideration the above information.

We look forward to hearing from you within the required timescale of three weeks from receipt of this screening request.

Yours faithfully,



DP9 Ltd