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Mr Benjamin Vickers
Planning Policy Officer
Strategic Planning and Implementation
Regeneration and Planning
2nd Floor, 5 St Pancras Square
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23.09.2016

Dear Mr Vickers,

Mount Pleasant Community Right to Build Order (EIA Screening)

On behalf of our client, the Mount Pleasant Neighbourhood Forum we write to obtain your advice on the requirement for an Environmental Impact Assessment (EIA) for the redevelopment of Phoenix Place, which is proposed within a forthcoming Community Right to Build Order (CRtBO). The development will be for:

“The provision of 125 residential units including one, two and three-bedroom flats in a series of five linked buildings ranging from four storeys to eight storeys (plus lower ground); approximately 1,200sqm of commercial space; a newly created communal open space over 900sqm in size that will be enclosed by the proposed block on three sides; communal roof terraces private to the residents and accessible by lift; widening of the western end of Mount Pleasant to create a new ‘pocket’ park adjacent to Christopher Hatton Primary School and with traffic calming measures along the section of road fronting the development site; parking, related to relevant accommodation, for disabled drivers to be located on Gough Street and Phoenix Place for residents and Mount Pleasant for visitors; and a minimum of 242 long stay cycle parking spaces and 16 short stay cycle parking spaces.”

After initial email advice from Ben Vickers on 20th January 2016, which advised an EIA would not be required, there was a subsequent request on 30th March 2016 from Ben Vickers to submit a formal screening request to ensure due process has been met.

This request for a screening opinion is based on the requirements and methodology for seeking a formal screening opinion as detailed in the following documents:

- The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 and Amendment 2015 (‘the Regulations’);
- The Planning Practice Guidance web portal; and
- EIA Guide to Procedure (November 2000).

The information contained within this letter is considered to be in accordance with Regulation 5 of

the Regulations, which states a request for a screening opinion shall be accompanied by:

- (a) A plan sufficient to identify the land;
- (b) A brief description of the nature and purpose of the development and of its possible effects on the environment; and
- (c) Such other information or representations as the person making the request may wish to provide or make.'

Current site situation

The current use of the site is a car park associated with the Royal Mail Sorting Office.

Proposed development

The development proposals within the CRtBO are as follows:

- The provision of 125 residential units including one, two and three-bedroom flats in a series of five linked buildings ranging from four storeys to eight storeys (plus lower ground);
- Approximately 1,200sqm of commercial space;
- A newly created communal open space over 900sqm in size that will be enclosed by the proposed block on three sides;
- Communal roof terraces private to the residents and accessible by lift;
- The proposal includes for the widening of the western end of Mount Pleasant to create a new 'pocket' park adjacent to Christopher Hatton Primary School and with traffic calming measures along the section of road fronting the development site;
- Parking, related to relevant accommodation, for disabled drivers to be located on Gough Street and Phoenix Place for residents and Mount Pleasant for visitors; and
- A minimum of 242 long stay cycle parking spaces and 16 short stay cycle parking spaces.

EIA requirements

The Regulations set out the legislative framework for establishing the need for an EIA to be undertaken and submitted in the form of an Environmental Statement ('ES') with a planning application. Regulation 5 sets out the process for identifying whether or not an EIA is required.

Under the EIA (Amendment) Regulations (2015) it is considered that the proposed development falls within category 10 (b) of Schedule 2, 'urban development projects' and is beneath the size threshold of 150 dwellings or 5 hectares in land coverage.

The screening criteria are set out in Schedule 3 of the Regulations (2011). The criteria fall into three broad headings: characteristics of the development (e.g. size, use of natural resources, quantities of pollution and waste generated); location of the development, and characteristics of the potential impact (e.g. extent and magnitude of impact, probability of impact, duration, frequency and reversibility of the impact).

Characteristics of development and environmental sensitivity of development location

The proposed development is for 125 residential units, which is beneath the development threshold of 150 units referred in Schedule 2, Section 10 (b), and Column 2 of the EIA (Amendment) Regulations (2015).

An email from Ben Vickers on 20th January 2016 also confirmed that the “results of the screening conclude that the proposed development does not fall within Schedule 2 of the EIA regulations and therefore an EIA is not required.”

The proposed development is to increase the quantum of development on this sustainable brownfield site. The nature of the proposals i.e. commercial and residential uses is considered appropriate due to the site location and surroundings and it is considered the development would not have significant ‘urbanising’ effects, particularly given the generous provision of public open space within the scheme.

The site’s location and proposal for residential accommodation is considered very sustainable due to its location within the Central Activities Zone and in close proximity to world-class shopping facilities, local schools and other local facilities and amenities. The site is located in Zone 1 and is well served by public transport. The PTAL for the site is 6b (excellent). It is very well served by existing bus routes. A total of nine bus routes have stops, which are accessible within PTAL walking distance (640m or 8 minute walk) of the site. The nine accessible bus routes surrounding the site provide a viable sustainable travel option to the majority of central London.

The scale and massing has been carefully considered to respond positively to the site surroundings. Careful design consideration has been given to ensure visual and overlooking impacts are minimised.

The development of the site for a residential use is anticipated to result in an increase in municipal waste generation. However, it is considered that the site is located in a sustainable location and that servicing vehicles can appropriately access it. The proposal is considered to have no negative effect in terms of waste generation.

The site is not within an environmentally sensitive location, i.e. it is not within an area defined as a ‘sensitive area’ in regulation 2(1) of the EIA 1999 Regulations.

Characteristics of the potential effects

Whilst it is understood that there will be environmental impacts through the site preparation and construction phases, it is anticipated that these will be minor and of a temporary nature. Mitigation for likely impacts will be agreed in consultation with the local planning authority prior to the commencement of works.

It is recognised that there are potential environmental impacts associated with the proposed development; however, these are not considered to be complex or significantly hazardous. Potential impacts are identified as being associated with:

- Air quality and noise impacts through construction phase;
- Visual impact through construction phase;
- Pollution and an increase in surface water run-off;
- Creation of habitat and amenity space;
- Provision of new residential units to meet market and affordable housing needs;
- Provision of new retail units to meet local community needs;
- Creation of employment opportunities throughout construction activities;
- Increase in municipal waste generation;
- Increase in local population and impact on education and healthcare facilities; and
- Increased pressure on local highway network and public transport services.

The development is not considered to have a significant impact trip generation from private cars due to the location within a high PTAL rated area and proximity to local facilities.

It is considered that the proposed development at a range of four to eight storey buildings is in keeping with the surrounding urban form and prevailing building heights and is unlikely to give rise to potentially significant adverse environmental impacts.

EIA screening advice

This request for a Screening Opinion is being made in accordance with Regulation 5 of Part II of the EIA Regulations 2011. The applicant is of the opinion that due to the size, nature and location of the development proposals, the proposal is not EIA development, as the scheme is not anticipated to result in significant environmental effects.

Phoenix Place clearly forms only a small part of the wider Royal Mail Sorting office landholding and the proposed development is not intended to be piecemeal development. The development will be capable of coming forward independently from the Royal Mail Group application without compromising that development. Alternatively, the long-term objective is to redesign the whole site befitting to the Mount Pleasant Association vision at Phoenix Place. The mechanism for delivering the wider site might be through a Neighbourhood Plan or Neighbourhood Development Order, or both. The comprehensive scheme will complement and incorporate the Phoenix Place development. These wider proposals will of course be so significant in scale that a detailed EIA will be prepared to accompany it. Within that EIA the Phoenix Place scheme will be tested for its environmental effects in the context of the whole scheme and any cumulative nearby developments.

I would be grateful if the Council could provide a Screening Opinion within three weeks of receipt of this request in consistency with Regulation 5(5). If you would like any further information then please do not hesitate to contact me.

Yours sincerely

A rectangular box containing a handwritten signature in black ink that reads "R Salmon".

Ralph Salmon

Associate

cc: Edward Denison – Mount Pleasant Association
ref: 0231 – Mount Pleasant