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Our Ref: WIE11701-100.170209.Ltr.PK

Date: 09 February 2017

Mr David Glasgow
Planning Department
London Borough of Camden
2nd Floor, 5 Pancras Square c/o Town Hall
Judd Street
London
WC1H 9JE

Dear David

Re: Town and Country Planning (Environmental Impact Assessment) Regulations, 2011 (as amended 2015): Part 2 Regulation 5 - Request for an EIA Screening Opinion for the redevelopment of The Ugly Brown Building, 6A St Pancras Way, London

Waterman Infrastructure & Environment Ltd ('Waterman IE') write on behalf of our client Reef Estates, to formally request a Screening Opinion pursuant to Regulation 5 of the above Regulations, in relation to the proposed redevelopment of The Ugly Brown Building, St Pancras Way within the London Borough of Camden (LBC). The land is bounded to the south by Granary Street, to the west by St Pancras Way (A5202) and to the east by the Regent's Canal (hereafter referred to as the 'Site', as shown on **Figure 1** within **Annex 1**).

The Site

As shown by **Figure 1** and **Figure 2**, the Site currently comprises three office buildings of up to four storeys (plus lower ground floor and roof plant) which houses circa 26,000sqm of office floorspace (Ted Baker Plc, Verizon Data Centre and a mixed-office building), contains approximately 50 car parking spaces and is bound by residential, commercial, educational (including student accommodation), medical, transport and recreational uses. The Site covers an area of approximately 1.14 ha.

With reference to the EIA Regulations, the Site is not within a 'sensitive area' (i.e. Site of Special Scientific Interest (SSSI) or any consultation area around an SSSI, Land to which Nature Conservation Orders apply, International conservation sites, National Parks, Areas of Outstanding Natural Beauty (AONBs), World Heritage Sites (WHSs) or Scheduled Monuments (SMs)).

A desk-based review of the Site and its environs reveals that the Site is located in an Air Quality Management Area (AQMA). In addition, the Site is located within the Regent's Canal Conservation Area and within close proximity to King's Cross St Pancras Conservation Area. The south east corner of the Site lies within the statutorily protected viewing corridor for the Protected Vista Point 2A.2 Parliament Hill to St Paul's Cathedral as outlined within the London View Management Framework (LVMF) SPG Assessment (refer to **Annex 2**).

The Site is not within or in proximity to an Archaeological Priority Area or a statutory ecological designated site and is considered to be at a low risk of tidal or fluvial flooding (Flood Zone 1). LBC have identified the Regent's Canal as a Site of Interest for Nature Conservation (SINC) of metropolitan importance, the boundary to which is located along the Site boundary.

Screening Opinion – June 2016

A request for an EIA Screening Opinion was issued to LBC on 28th April 2016 which set out that the proposed development would provide three new buildings of circa 70,000sqm comprising offices, residential (circa 250 units) and a hotel (with retail / restaurant uses at ground floor). The new buildings would rise to circa 16 storeys (plus basements) at the tallest point with approximately 90 car parking spaces. A Screening Opinion was received from LBC on 6th June 2016 which advised that *“the proposed development ... is 'EIA development' within the meaning of the 2011 Regulations (as amended), and hence a positive screening opinion is hereby adopted”*.

EIA Scoping Report – January 2017

A period of design development followed this, and a request for an EIA Scoping Opinion was issued to LBC with an EIA Scoping Report on 23rd January 2017. The EIA Scoping Report set out that the development proposals would comprise the following mix of uses within 3 Plots on the Site (**Figure 2** within **Annex 1**):

- Plot A would comprise one building of office and retail uses.
- Plot B would comprise one building of office, hotel and retail uses.
- Plot C would comprise three buildings of office, retail, gym and residential uses (ranging from 50 to 130 residential units, including affordable homes).

The new buildings would range from 7 to 15 storeys at the tallest point with a maximum of 100 car parking spaces and the potential for a small amount of B8 storage within the basement. Public realm space would be provided across the Site to allow access to the canal-side.

Revised Request for a Screening Opinion – February 2017

Reef Estates are now in a position to confirm that compared to both the June 2016 Screening Opinion and January 2017 Scoping Report, the revised proposals:

- are lower i.e. have reduced from 16 to 11 storeys with an upper / lower ground floor (circa 67m Above Ordnance Datum (AOD));
- contain significantly fewer residential units i.e. reduced from 250 units to 65 - 100 units;
- contain fewer car parking spaces (i.e. reduced from 100/90 to only 60 spaces); and
- provide a total Gross External Area (GEA) of circa 79,000sqm within Plots A, B and (comprising B1 office and D2 gym, A1 to A3 retail, C1 hotel, C3 residential, the potential for some B8 storage at basement level) and public realm improvements.

Thus the scheme would be less visible within the Regent's Canal Conservation Area, there would be less of an effect on daylight and sunlight amenity on neighbouring receptors (student accommodation to the west and residents to the north of the Site), less likely to cause adverse effects on the local wind microclimate, and add less pressure on community services such as health facilities and schools. The number of car parking spaces is less than originally proposed and is similar to the number which currently exist, and therefore is unlikely to cause a significant change to traffic flows, noise levels and air quality. On account of these changes, a Screening Opinion is being requested from LBC.

Reef Estates intends to submit a full planning application for the redevelopment of the Site (hereafter referred to as the 'Development', **Figure 3** within **Annex 1**). Whilst the design of the Development is not yet fixed for the purposes of the full planning application, the information provided by Reef Estates and contained herein is considered to be adequate to establish the likely environmental effects of the proposed Development and to advise on the scope of environmental planning deliverables.

Determining whether an Environmental Impact Assessment is required

The determination of whether EIA is required rests in the consideration of whether the development is:

- Schedule 1 development – in which case EIA is necessary; or
- Schedule 2 development – in which case EIA is necessary only if the development is likely to have significant environmental effects as referenced in Schedule 3 of the Regulations.

The proposed Development does not meet any of the categories of development in Schedule 1 of the Regulations for which EIA is mandatory. However, it is considered to fall within one of the categories of development set out in Schedule 2 of the Regulations, namely Category 10b 'Urban Development Project' where the Development would exceed part '(i)' from the following relevant criteria:

- "10. (b) Urban development projects...[where]...;*
- (i) The development includes more than 1 hectare of urban development which is not dwelling/house development; or*
 - (ii) the development includes more than 150 dwellings; or*
 - (iii) the overall area of the development exceeds 5 hectares."*

As such Schedule 3 of the EIA Regulations needs to be considered to determine whether the proposed Development should be subject to formal EIA, as set out within **Annex 2**.

Conclusion

Given the nature of the Development and lack of sensitivity of the Site in EIA terms, it is concluded that any effects of the Development will be local to the Site and its immediate surroundings and no 'significant environmental effects' are likely to arise.

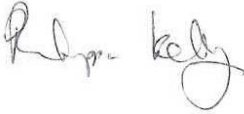
For the reasons set out above, these effects are not considered 'significant' or of an unusually complex nature. Any effects will be of local importance and, as a result, the likely effects are capable of being properly considered as part of the normal planning application process and do not warrant an EIA. In addition, in order to accord with various planning requirements (not legislative requirements) and as set out by the LBC validation checklist, we do acknowledge the need for the full Planning Application to be supported by the following suite of environmental technical studies. Further detail is provided in **Annex 2**:

- A London View Management Framework and Heritage Assessment
- A Transport Assessment (including a Travel Plan)
- A Noise, Vibration and Ventilation Assessment
- An Air Quality Assessment (including an Air Quality Neutral Assessment)
- A Contaminated Land Assessment
- A Construction Management Plan
- Preliminary Ecological Appraisal (Biodiversity Survey and Report)
- Tree Survey / Arboricultural Statement
- Landscaping Scheme
- Flood Risk Assessment, Drainage Strategy and Drainage Management Plan
- An Historic Environment Desk-Based Assessment
- A Daylight, Sunlight and Overshadowing Assessment
- Waste Storage and Collection Plan

We therefore kindly request that LBC adopts a Screening Opinion to confirm that an Environmental Statement will not be required for the proposal.

We look forward to receiving your EIA Screening Opinion within three weeks of receipt of this letter. Should you require any further information to assist in formulating your Screening Opinion, please do not hesitate to contact me.

Yours sincerely



Pippa Kelly
Associate Director
For and on Behalf of Waterman Infrastructure & Environment Ltd

Enc: Annex 1: Figures
Annex 2: Consideration of Schedule 3 EIA Screening Criteria

cc. Jason Russell, Reef Estates
Luke Thrumble, DP9

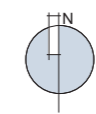
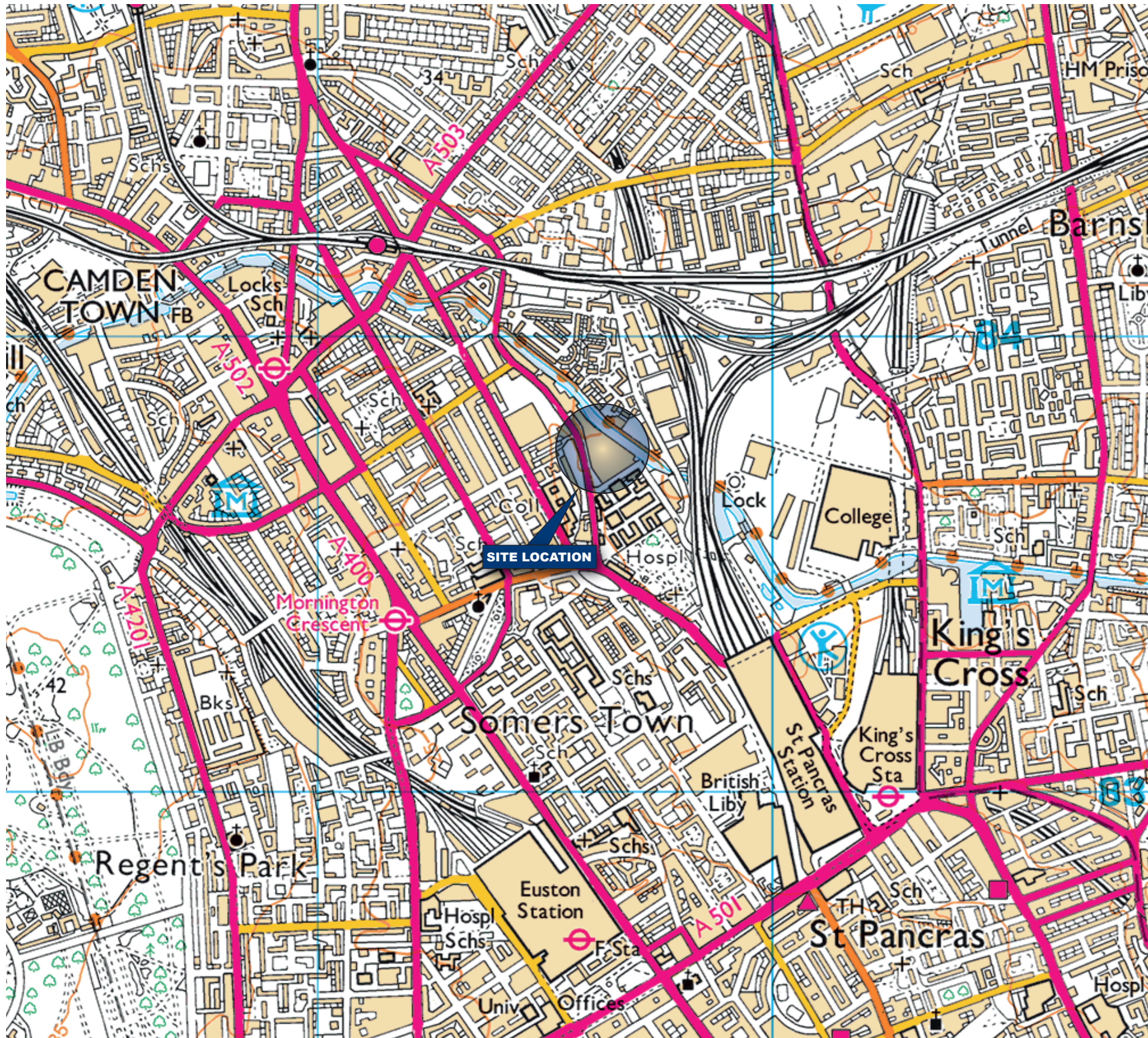
ANNEX 1: Figures

Figure 1: Site Location Plan

Figure 2: Red Line Planning Application Boundary Showing Plots

Figure 3: Indicative Development Proposals

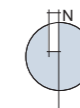
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Project Details	WIE11701-100: Ugly Brown Buildings, London
Figure Title	Figure 1: Site Location
Figure Ref	WIE11701-100_GR_SL_1A
Date	February 2017
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Site Boundary



Project Details

WIE11701-100: Ugly Brown Buildings, London

Figure Title

Figure 2: Site Boundary Plan

Figure Ref

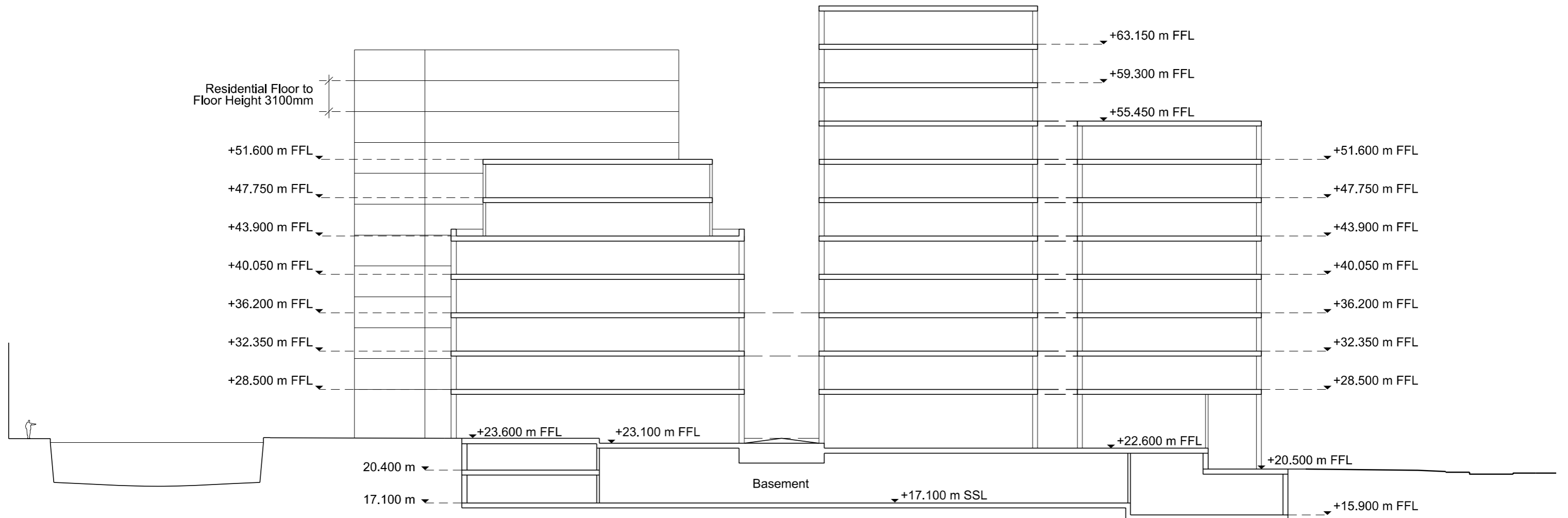
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Project Details	WIE11701-100: Ugly Brown Buildings, London
Figure Title	Figure 3: Indicative Proposed Building Heights
Figure Ref	WIE11701-100_GR_SL_3A
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ANNEX 2: Consideration of Schedule 3 EIA Screening Criteria

1. Characteristics of the Proposed Development

With reference to the selection criteria listed in Schedule 3 of the EIA Regulations, the characteristics of the Development are set out below:

- a. The area of the proposed Development is approximately 1.14 ha. It would comprise the demolition of the existing buildings on the Site and construction of B1 office, D2 gym, A1 to A3 retail, C1 hotel and C3 residential uses within the 3 plots on the Site and the potential for some B8 storage within the basement (**Figure 3**), providing a total area of 79,000sqm GEA. It would provide between 65 – 100 residential units (1 to 4 bed) along with a maximum of 60 car parking spaces (including disabled parking spaces), two basement levels, and public realm improvements.
- b. The residential units would be located within two blocks within Plot C (the southern portion of the Site) alongside office and retail space, centred around communal amenity space. It is currently proposed that the new blocks would rise up to 11 storeys and an upper / lower ground floor.
- c. Block B would comprise the demolition and reconstruction of the Ted Baker offices, provision of ground floor retail and a hotel in a block up to 9 storeys above ground level.
- d. Block A would comprise ground floor retail and office space in a block up to 6 storeys.
- e. It is currently proposed that the basement would comprise car and cycle parking, refuse areas and plant rooms and potential space for self storage units.
- f. The construction works would be subject to a Construction Environmental Management Plan ('CEMP') which would employ legislative and best practice management to minimise the adverse effects of construction effects as far as practicably possible, including construction waste management. Once operational, sufficient storage facilities will be provided within the Development in line with local planning authority requirements to ensure high levels of recycling would be achieved. Refer to **Annex 2** for further consideration of waste.
- g. Possible noise and air pollution / nuisances arising from building plant and light pollution during both construction and the completed Development would be subject to regulatory controls, to ensure that any adverse pollution / nuisance effects are avoided or reduced to an acceptably low level. The noise and air quality levels resulting from this Development are unlikely to significantly change from the existing situation.
- h. Following completion of the Development, as the proposals comprise non-industrial development, the risk of accidents in relation to hazardous or dangerous substances would be low. During the construction works, the implementation of the aforementioned CEMP would ensure that any hazardous materials on Site, including asbestos, be removed in an appropriate manner and by licenced contractors.

2. Location of Development

With reference to the criteria in Schedule 3 of the EIA Regulations, the sensitivity of the geographical area likely to be affected by the Development must be considered. This is discussed below:

- a. The Site is bound to the south by Granary Street, to the west by St Pancras Way and to the east by the Regent's Canal. Immediately to the north of the Site is a five storey building (Canal Side Studios) comprising office accommodation.
- b. Other land uses surrounding the Site are varied and include:
 - Residential and commercial uses to the south-west and north-east;
 - Commercial uses to the north-west;
 - Educational use, including The Royal Veterinary College, approximately 75m south-west of the Site, with associated student accommodation adjacent to the Site along St Pancras Way; Medical use, including Saint Pancras Hospital, adjacent to the south of the Site, with St. Pancras Gardens further south;
 - Transportation uses, including users of the A5202 (St Pancras Way) and railway lines approximately 120m to the east of the Site;
 - Recreational use, such as the Regent's Canal Towpath, within 20m of the Site, running alongside the Regent's Canal.
- c. The Site currently comprises three office buildings of up to four storeys (plus lower ground floor and roof plant) which houses circa 26,000sqm of office floorspace (Ted Baker Plc, Verizon Data Centre and a mixed-office building). On-site car parking is currently limited to circa 50 spaces, which have access from St Pancras Way.
- d. The Site has a Public Transport Accessibility Level (PTAL) of 6a-6b. This is the highest possible PTAL classification, indicating that the Site is highly accessible by public transport with a wide range of options accessible within a short walking distance. For example, Mornington Crescent underground station is approximately 7-8 minutes walking distance to the west of the Site and Kings Cross & St Pancras International London Underground and Railway Station is approximately 10-11 minutes walking distance to the south of the Site.
- e. The Site is not located in a nature reserve nor is it located in a nationally designated area such as a Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA), National Parks, Area of Outstanding Natural Beauty (AONB), National Nature Reserve (NNR) or Ramsar Site. LBC have identified the Regent's Canal as a Site of Interest for Nature Conservation (SINC) of metropolitan importance, the boundary to which is located along the Site boundary. Camley Street Nature Park, a Local Nature Reserve (LNR), is located approximately 285m south east of the Site, however railway lines physically separate the locality of the LNR from the Site.
- f. The Site is located within the Regent's Canal Conservation Area and within close proximity to the King's Cross St Pancras Conservation Area. The south east corner of the Site lies within the statutorily protected viewing corridor for the Protected Vista from LVMF SPG Assessment Point 2A.2 Parliament Hill to St Paul's Cathedral as outlined in the London View Management Framework. The Site lies outside the Protected Vista from LVMF SPG Assessment Point 4A.2 Primrose Hill to St Paul's Cathedral but would be potentially visible within the panorama.
- g. There are no listed buildings on the Site. A Grade II listed structure 'Penfold Pillar Box Outside Royal Mail North West District Office (Office Not Included)' is located to the north-west of the Site along St Pancras Way (Grid Reference: TQ295838). Further listed buildings are located along Royal College Street, approximately 130 m east of the Site. St Pancras Gardens, located approximately 145 m south of the Site, is a Grade II listed Registered Park and Garden and contains a number of listed structures including the Grade I listed Soane tomb and the Grade II* listed Old Church of St Pancras.

- h. The Site is located in Flood Zone 1 and is considered to be at a low risk of tidal or fluvial flooding (less than 1 in 1,000 annual probability of river or sea flooding).
- i. LBC has declared the entire borough as an Air Quality Management Area (AQMA) (an area where there is public exposure, e.g. residential properties, in areas exceeding the National Air Quality Objective) for exceedances of the annual mean NO₂ objective and daily mean PM₁₀ objective, attributed to vehicle emissions.

3. Characteristics of the Potential Effects

The range of potential environmental effects associated with the Development is considered as follows:

a. Townscape, Heritage and Visual

As set out within Section 2, the Site is within the Regent's Canal Conservation Area and the south east corner is within a protected view (Parliament Hill to St Paul's Cathedral). There are no listed buildings on Site, but there are listed buildings in close proximity to the Site. The Site itself does not contain any heritage assets.

The surrounding townscape is mixed in architectural character, quality and scale. To the west of the Site, buildings are taller and larger in scale (5 storeys above a raised height ground floor). To the east of the Regent's Canal, the buildings are low rise with some higher rise buildings off Camley Street (including the 8 storey Urbanest St Pancras building to the east). Adjacent buildings are mostly of late twentieth century date.

The Development would result in both temporary townscape and visual changes during the construction works and permanent change to the character of the Site on completion of the Development.

There will be a change to the setting of the Regent's Canal and King's Cross Conservation Areas, the registered landscape of St Pancras Gardens and nearby listed buildings. There would also be changes to the protected view and non-statutory local and medium distance views.

It is considered that the taller elements of the proposals would be visible from wider viewpoint locations. The design and nature of the proposals mean they will complement the urban character of the area. Development of the scale and type proposed would be consistent with other developments in the surrounding townscape.

The proposed uses for the buildings are complementary to the character of the Conservation Areas (and the listed buildings). Any adverse impacts to the Conservation Areas or the character of the townscape, should be considered against the benefits from the scheme which would comprise incorporated mitigation.

The scale of the impacts on heritage assets, townscape character and views arising from the proposals are localised and are not of high magnitude. The impacts of the proposals, being limited, do not warrant assessment as part of an EIA.

Details of the design, visual and townscape effects of the development proposals will be assessed fully in the London View Management Framework and Heritage Assessment and the Design and Access Statement submitted with the full planning application.

b. Transportation and Access

During the demolition and construction works there is likely to be a short term, temporary increase in local traffic, including heavy goods vehicles, as a result of the transportation of building materials, workers and other deliveries, which is likely to result in some temporary, localised disruption to road users. However, these short term effects would be typical of any construction project and could be

effectively managed through the implementation of standard best practice construction traffic management. This could be achieved via the implementation of a pre-agreed Traffic Management Plan which would form part of a CEMP.

There are currently 50 designated car parking spaces on-site and 60 spaces are proposed (including disabled parking).

As set out previously, the Site has a PTAL of 6a-b, which is the highest possible classification. This indicates that the Site is highly accessible by public transport with a wide range of options accessible within a short walking distance. It is therefore anticipated that the extremely good access to public transport will mean that despite an increase in people at the Site (residents, hotel users, and employees) private car trips will be very limited. The number and frequency in services of underground and bus services in the vicinity of the Site, along with the anticipated large number of cyclists and pedestrians using the Site mean that it is unlikely that there would be significant effects on public transport capacity.

Servicing and delivery for the residential and commercial element would generate some trips, but these are not expected to significantly increase from the existing facility. The potential self-storage facility would generate additional trips. However, such vehicular activities can be expected to be small in number and not significantly change traffic flows in this area given the nature of the roads and existing activity. As a result, it is considered unlikely that the Development would generate significant additional traffic.

The design of the proposed Development includes increasing the level of pedestrian and cycle accessibility through the Site to the Regent's Canal, which ensures there would be no significant adverse effects on pedestrian or cyclist movements. Although the proposed Development is not anticipated to generate any significant adverse transport and access effects, a Transport Statement (including a Travel Plan) would be submitted with the detailed planning application in accordance with current planning policies, Transport for London's (TfL) best practice guidance and LBC's requirements.

c. Noise and Vibration

The noise environment at the Site is expected to be typical for a busy urban location and likely to largely emanate from transport sources including trains using the railway lines to the east of the Site and vehicular traffic on surrounding main roads. There are no significant vibration generating sources (e.g. London Underground or mainline railway proximal to the Site).

During demolition and construction, there would likely be a short-term, temporary increase in noise levels as a result of construction plant, equipment and delivery vehicles. These temporary, short term effects would be typical of any construction project and may lead to some localised disturbance to the neighbouring residential and commercial properties and commercial occupiers on-site during the phased construction of the Development. The noise and vibration effects could be effectively managed through the compliance with legislative requirements via the implementation of environmental management control measures detailed within the CEMP.

It is anticipated that the extremely good access to public transport will mean private car trips associated with the Development would be very limited. Servicing, deliveries and access to the self-storage units would generate some traffic. However, such activities can be expected to be small in number and would not significantly change traffic flows in this area or give rise to any additional traffic noise.

Although there would be some noise resulting from the operation of mechanical plant and building services, it is anticipated that most of the plant and servicing would be contained in the basement level with the remainder provided at roof level away from existing sensitive receptors at The Royal Veterinary College, St Pancras Hospital, and residential receptors (student accommodation) immediately adjacent to the Site on St Pancras Way. In addition, standard, tried and tested conditions can be applied to a

planning permission that can be relied upon to reduce noise from fixed plant to prescribed levels, in accordance with standard planning policy so that no adverse effects would result.

In view of the above, it is considered unlikely that the Development would give rise to significant adverse noise and vibration effects to local receptors. However, a Noise and Vibration Impact Assessment would be submitted with the full planning application to provide an evaluation of prevailing noise levels in demonstrating suitability of the Development's proposed uses against relevant and credited guidance (NPPG¹; BS 8233:2014² and BCO, 2014³) and the requirements of LBC.

d. Air Quality and Climate

The whole of LBC has been designated an AQMA in relation to nitrogen dioxide (NO₂) and particulate matter (PM₁₀), with the key air quality issue relating to vehicular emissions.

During the demolition and construction works, construction traffic, plant and activities, would give rise to some emissions to air, including the potential to generate nuisance dust to neighbouring residents and commercial occupiers. However, these temporary effects would be expected at any construction site and would be minimised through compliance with legislative requirements and the implementation of environmental management control measures detailed within the CEMP.

Although the Site is within an AQMA, it is considered highly unlikely that the Development proposals would significantly affect local air quality. This is for the following reasons:

- The servicing and delivery trips and access to the self-storage area would generate some traffic, but the increase is unlikely to contribute significantly to the overall traffic flows in the area.
- There is only a small increase in the number of car parking spaces, from 50 to 60 spaces.
- The proposals do not include any industrial processes.
- Existing plant would be replaced by newer / more efficient plant.

However, because the Development is located in an AQMA an Air Quality Assessment would be submitted with the full planning application. In line with Sustainable Design and Construction⁴, Supplementary Planning Guidance (SPG) published by the Greater London Authority (GLA) in April 2014 to supplement the London Plan, an Air Quality Neutral Assessment will also be submitted with the full planning application.

In terms of demand for natural resources the proposed Development will be built at least to the requirements of Building Regulations and as a consequence the residential components will have less impact on energy demand than the majority of the existing building stock. Furthermore, the scale of the proposed Development is such that the effect it would have on global warming would be immeasurable and therefore unlikely to be significant.

e. Ground Conditions and Contamination

In terms of historical land use, after the opening of the Regent's Canal in the early 19th Century, a settlement of villas and terraced houses was developed on the Site and became known as Agar Town. The Site was cleared on completion of the nearby St Pancras Station in 1868 and a large building (known as the Granary) was constructed and used as an ale and porter store. The Canal was widened to the edge of the Granary forming a wharf whilst a railway bridge and ramps allowed the transfer of goods from rail to road and water. The Granary was destroyed by fire in 1978.

¹ Department for Communities and Local Government, 2014. *Noise*. Available from: <http://planningguidance.planningportal.gov.uk/blog/guidance/noise/>

² British Standard Institute (BSI) (2014); BS 8233 'Guidance sound insulation and noise reduction for buildings. BSI

³ British Council for Offices (2014); Guide to Specification 2014.

⁴ GLA, April 2014, Sustainable Design and Construction - Supplementary Planning Guidance - Available at <https://www.london.gov.uk/priorities/planning/consultations/draft-sustainable-design-and-construction>

In 1986, a Royal Mail Sorting Office was constructed on the Site. The Royal Mail vacated the building in the mid-1990s. The current building footprint is unchanged from the Sorting Office and the building is used as offices.

A Phase 1 Geo-Environmental Report for the Site, undertaken by Enzygo in September 2015, indicates no significant contamination source has been identified on the Site. However, given the age of the structure, there is a risk of asbestos being present, which would need to be addressed prior to demolition works.

Historical potential off-site sources of contamination include a former Engineering Works, located 15m north west of the Site, which may have led to oil or fuel spillages, although significant contamination is unlikely. There is also a goods yard and railway sidings located 20m east of the Site, however these are separated from the Site by the Regent's Canal, and as such, on-site migration of potential contaminants is unlikely.

Some potential for contamination is considered to exist at the Site associated with historical and recent use of the Site. However, the potential for contamination is likely to be localised, and with appropriate mitigation, the assessment or remediation of any contamination is unlikely to result in any significant environmental effects.

Construction works and procedures would follow current best practice and legislative requirements, and as such, the potential effects of the proposed Development on ground conditions and the adjacent Regent's Canal would not be expected to be significant. Nevertheless, a CEMP would be implemented for the duration of the works. Therefore, significant effects on construction workers on the Site or local people is unlikely. The basement construction and any piling associated with the proposed Development will be undertaken in accordance with best practice to ensure that the works do not result in the creation of a preferential pathway. As a result, the redevelopment of the Site is considered unlikely to give rise to significant effects on groundwater flow or quality.

The nature of the proposed Development means exposure of any potentially contaminated by occupiers of the Site is unlikely. Landscaped areas would be designed to limit the potential for users of the Site to come into contact with contamination. Similarly, potential run-off from the completed development to the Regent's Canal would be controlled through standard conditions attached to a planning permission. As such significant effects on users of the Site is unlikely.

In line with the NPPF, a Phase 1 Preliminary Environmental Risk Assessment (PERA) or Contaminated Land Assessment will be carried out and submitted with the planning application to evaluate potential contamination risks posed at the Site and identify the requirement for further assessment.

f. Archaeology

The Site is not located within an Archaeological Priority Area, nor does it contain, any scheduled monuments. A non-designated Greater London Historic Environment Record (GLHER) is noted within the Site, and relates to the site of a tramway system which is visible on historic OS maps from 1875 through to 1916. It probably survived until the beginning of World War Two.

The Site is located within the Regent's Canal Conservation Area and is 150m north-west of an archaeology priority area created around the original Saxon settlement of the St. Pancras estate. St Pancras Old Church is likely to be early medieval in origin and one of the oldest churches in London⁵.

The potential for survival of archaeology from different time periods across the Site may be varied due to past developments. As some intrusive works would be undertaken during the construction of the

⁵ GLHER Monument record MLO80197

Development, a Historic Environment Desk-based Assessment would be submitted with the full planning application. This would examine the archaeological potential of the Site and would be in line with the policy requirements of the NPPF, the London Plan and the Local Plan. Considering that the intrusive works would be limited, there is unlikely to be any significant effects on archaeology.

g. Water Resources and Flood Risk

Significant effects from flooding of rivers and the sea is highly unlikely as the Site is wholly located in Flood Zone 1. However, National Planning Policy Framework (NPPF) together with current guidance from the Environment Agency, places a greater emphasis on the need to consider surface water flooding risks and the impacts of climate change as part of redevelopment proposals. As such, it is recognised that Flood Risk Assessments (FRAs) are required for all developments exceeding 1 hectare in site area, irrespective of whether they are located in an area of low, medium or high flood risk.

Although significant effects in relation to flood risk and drainage are unlikely, a Flood Risk Assessment and Drainage Strategy would be submitted with the planning application. This would address the required information in regards to flood risk and Sustainable Drainage Systems (SuDS) to ensure compliance with LBC and National Planning Policy, as well as an assessment of foul drainage.

h. Microclimate – Daylight, Sunlight and Overshadowing

The nearest residential receptor in proximity to the Site includes student accommodation located immediately to the west along St Pancras Way. This is considered a less sensitive receptor as such accommodation is occupied on a temporary basis. There are also residential receptors to the north of the Site (Camley Street and Reapers Close). The Regent's Canal is also an ecological receptor as the potential exists for shading from buildings and / or new lighting (set out in Section I.).

Effects in relation to daylight, sunlight and overshadowing would vary throughout the demolition and construction phase. They would, however, certainly be less than the effects of the completed proposed Development and would only be temporary.

The proposed Development is to be designed to avoid breaching BRE guidance where ever possible. This being the case, it is unlikely that the proposed Development would give rise to any significant daylight, sunlight and overshadowing impacts. A Daylight, Sunlight and Overshadowing Assessment would be submitted with the detailed planning application to establish the level of impact to surrounding residential receptors.

i. Microclimate – Wind

The revised scheme features 4 buildings and a pavilion, the tallest of which is 11 storeys and a split ground floor located to the south of the Site.

As a result, it is not anticipated that strong downdraughts or other adverse wind microclimate effects would result. The scale and massing of the proposed Development is therefore unlikely to generate any significant wind microclimate effects within or around the Site. No further assessment is considered to be required.

j. Waste

The construction and operation of the proposed Development would inevitably generate waste. However, as previously noted, a CEMP would be prepared, to be implemented by the contractor during the construction works. This would ensure that waste is managed in line with relevant legislation and best practice to minimise waste generation and maximise reuse and recycling.

In terms of operational waste, as part of the design process and in line with local and national requirements, the proposed Development would need to provide sufficient space for the storage of segregated general and recyclable waste. In addition, the servicing of the proposed Development would ensure that adequate waste collection and disposal can occur as necessary.

In light of the above, construction and operational waste generation is not considered to give rise to significant environmental effects. Furthermore, the Development is not likely to give rise to particularly hazardous waste materials.

k. Socio-Economics

Construction and operation of the Development would provide some temporary and permanent local employment opportunities, as would be expected for a project of this type. There would be construction jobs created during the construction and refurbishment phases of the Development. This is likely to be temporary and short term and would not significantly impact on the local economy.

The offices proposed as part of the Development would result in the generation of permanent on-site jobs, and in turn, employee spend in the local area. However, it is anticipated that these effects would be relatively small on account of the existing employment generated by the offices on-site: the uplift in jobs is unlikely to be noticeable in the context of existing levels of commercial activity in the surrounding area. The proposed retail uses and gym would be used to service the new commercial and residential population and immediate locality and therefore the economic effects would be limited.

The 65 -100 residential units proposed as part of the Development would result in a new residential population in the area. This new residential population would result in additional household spending in the locality, supporting employment in local shops, services and other amenities. Again, it is anticipated that these effects would be relatively small and would be unlikely to be noticeable in the context of existing levels of commercial activity in the surrounding area.

The new residential population would also place some additional demand on community services such as primary health care and primary and secondary school places. It is anticipated however, that the population, some of which are likely to already be resident in the Borough, could be accommodated by existing services or would be dealt with by way of contributions and a legal agreement for the planning permission. As such, the above socio-economic effects would not be expected to be significant.

l. Ecology

The Site is not part of an area covered by a European or National statutory designation, such as a Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI) and there are no statutory designated sites within 2 km of the Site. However, LBC have identified the Regent's Canal as a Site of Interest for Nature Conservation (SINC) of metropolitan importance, the boundary to which is located along the Site boundary. Camley Street Nature Park, a Local Nature Reserve (LNR), is located approximately 285m south east of the Site, although railway lines physically separate the locality of the LNR from the Site.

An 'Extended' Phase 1 Habitat Survey of the Site was undertaken in June 2015 which confirms that the Site is predominantly composed of hard standing, buildings, associated soft landscaping and a few trees. Due to the nature of these habitats and the level of disturbance they are subject to, the habitats within the Site are considered to be of low to negligible value for wildlife. It is also considered that the habitats are largely unsuitable for any protected species, albeit the trees and shrubs do provide some limited habitat for breeding and foraging birds. There could be potential effects as a result of the removal of bird nesting habitat, light spill into the canal corridor potentially affecting foraging and commuting bats, shading of the canal and a long terms change as a result of ecological enhancement following Development.

Although there are potential effects, these are assessed as either negligible or of limited significance and would be appropriately addressed by standard mitigation measures and considerations, including best practice to protect nesting birds and manage any wildlife found on-site. Similarly measures would be proposed to ensure that the canal corridor (including all land within the SINC boundary) is suitably safeguarded during demolition and construction, and once completed. As such, a Preliminary Ecological Appraisal and Arboriculture Impact Assessment would be submitted with the planning application.

m. Cumulative Effects

For the reasons set out in the main body of this letter and in this Annex, it is considered that the Development would not be captured by the EIA Regulations. Accordingly, the Development would unlikely lead to significant cumulative environmental effects with any other reasonably foreseeable schemes in the vicinity of the Site.

It should be noted that a CEMP will be developed and implemented to ensure that the combined effects during the demolition and construction works from the Development and other schemes in the immediate vicinity would be minimised as far as practicable.