RAMBOLL

ENVIRONMENT
& HEALTH

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Dear Kristina

REQUEST FOR AN EIA SCREENING OPINION UNDER REGULATION 6 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017: CAMDEN HIGHLINE

Date 21/08/2020

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We are writing to you on behalf of Camden Town Unlimited (hereafter referred to as 'the Applicant') as the local planning authority to request an Environmental Impact Assessment (EIA) 'Screening Opinion' pursuant to Regulation 6(1) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the '2017 EIA Regulations') in regard to the proposed Camden Highline project (the 'proposed development').

1. BACKGROUND

The Applicant is the elected representative of businesses within Camden. Its mission is to enhance the commercial environment for local businesses and make Camden a place that people not only want to visit, but a place they want to stay. As the Business Improvement District for Camden Town, the Applicant delivers and campaigns for a range of projects and policies to benefit the local area.

The Applicant began working on the concept of a Highline (similar to existing precedents in New York, Paris and Seoul) in 2015 to transform the disused railway between Camden Town and King's Cross into an elevated park, providing a unique green space and walking route to King's Cross. Initial meetings were held with Network Rail in 2016. Once it was established that Network Rail would agree to leasing the required land and the principle of the proposal, a crowd funding campaign commenced in June 2017. Feasibility Studies were undertaken by Meinhardt in 2017, followed by Concept Studies in 2018. Pre-application consultations have been undertaken with the Greater London Authority and the London Borough of Camden (LBC).

The funding campaign has been sufficient to begin the process of drafting and submitting a planning application for the proposed development. In September the Applicant plans to launch a competition to select the design team who will take the project through to a planning application.

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2. PURPOSE OF THIS LETTER

This letter represents a formal EIA Screening Opinion request from the Applicant to the competent authority (i.e. the London Borough of Camden (LBC)) under the 2017 EIA Regulations. In accordance with Regulation 6(2), this letter contains the following to enable the LBC to determine that the proposed development does not constitute an 'EIA Development':

- A plan sufficient to identify the land (refer to Figure 1);
- A description of the proposed development, in particular the physical characteristics of the proposed development;
- A description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected (refer to Figure 4);
- A description of the aspects of the environment likely to be significantly affected by the proposed development;
- A description of any likely significant effects of the proposed development on the environment resulting from:
  - the expected residues and emissions and the production of waste, where relevant;
  - the use of natural resources, in particular soil, land, water and biodiversity; and
- Any other information including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects.

3. SITE LOCATION AND DESCRIPTION

The site is located in the borough of Camden and stretches from the A5200 York Way in the east (Grid Reference: TQ 30123 84137) to the A400 Kentish Town Road in the west (Grid Reference: TQ 28972 84216) as shown in Figure 1.

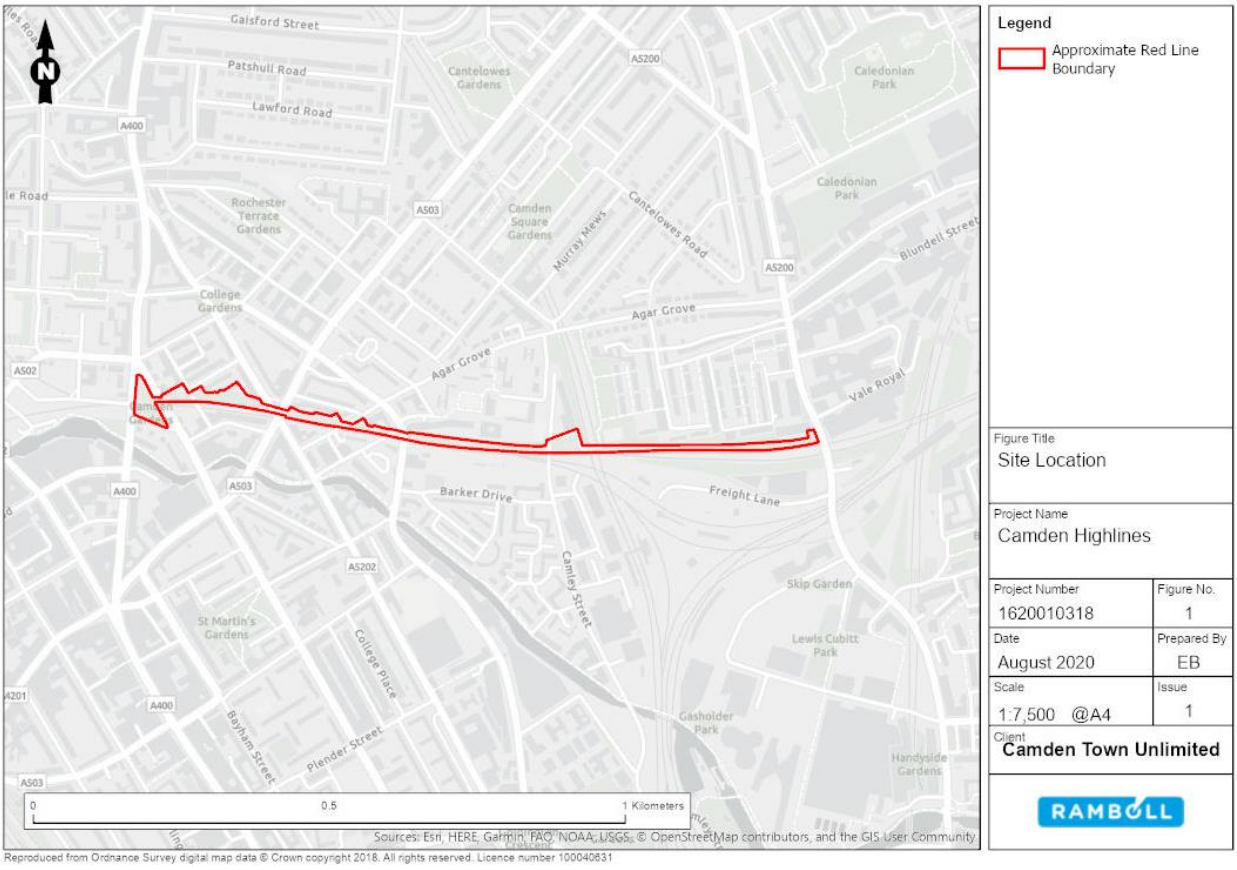

Figure 1: Site Location

In respect of the immediately surroundings, the site lies within an urbanised area that is primarily characterised by dense mixed-use urban development of varying scale and height, with the Regents Canal to the south and rail infrastructure to the south-east.

The approximate redline boundary area covers a linear distance of approximately 1.5 km and an area of approximately 1.2 hectares (ha). The width of the site currently ranges from less than 3.5 m to 20 m; however, the redline boundary has been drawn to ensure a minimum width of 3.5 m.

The majority of the redline boundary comprises a partially disused railway line owned by Network Rail (NR). The site is located immediately adjacent to the active London Overland Rail Line from Richmond to Stratford. At ground level the site also includes Camden Gardens in the west, including three railway viaduct arches, which would be utilised as an access point to the Highline and for commercial floorspace. Three additional access areas at Royal College Street, Camley Street and York Way also form part of the redline boundary. Camden Gardens and its associated arches are owned by the LBC.

The site can be separated into two distinct parcels of land as shown in Figures 2 and 3:

- Area 1 extends between Kentish Town Road and Saint Pancras Way (see Figure 2) and comprises an elevated brick viaduct. This viaduct is characterised by a series of brick arches which support both the active electric Overland Rail Line and the disused areas in which the proposed development would be located. There are three railway arches located within Camden Gardens which currently serve as pedestrian through routes. To the east of Camden Gardens there are a number of businesses currently operating from commercial premises located within railway arches. These do not form part of the site and would not be materially affected by the proposed development. In addition to the masonry railway arches, the route contains three disused steel bridges which run parallel to but, separate from, the operational line.

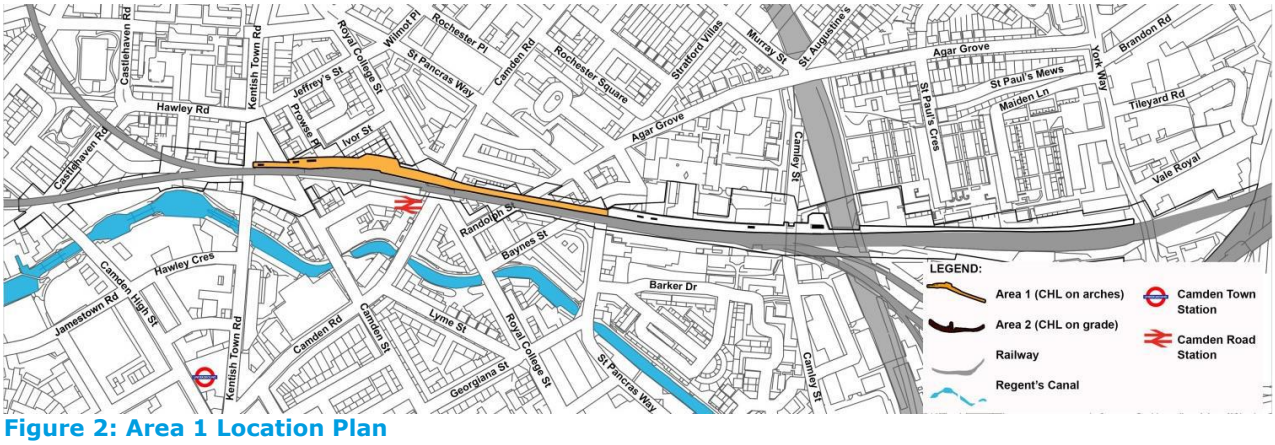

Figure 2: Area 1 Location Plan

- Area 2, which extends from Saint Pancras Way to York Way, is built on top of an embankment made of compacted soil (see Figure 3). This part of the site does not contain any railway arches; however, there is a bridge spanning over Camley Street and the adjacent Overland Rail Line which traverses from north to south. There is an existing pedestrian footpath which utilises an elevated walkway which allows movement over the London Overland Rail Line. To the east of Camley Street the site narrows and runs parallel to the north of the active line. This section of the site is primarily embankment and scrubland which is no longer required for the operation of the railway line.

The site includes a total of five bridges, three of which are without any decking. In addition, there are various NR Relay Rooms; Location Cases; Signalling Cases; Overhead Masts; Catch Pit Chambers; Maintenance Lighting Posts; Axle Counters; and Power and Telecoms Cables.

The eastern part of the site is typically 3.5-5 m; the central part 5-10 m and the western part 5-20 m.

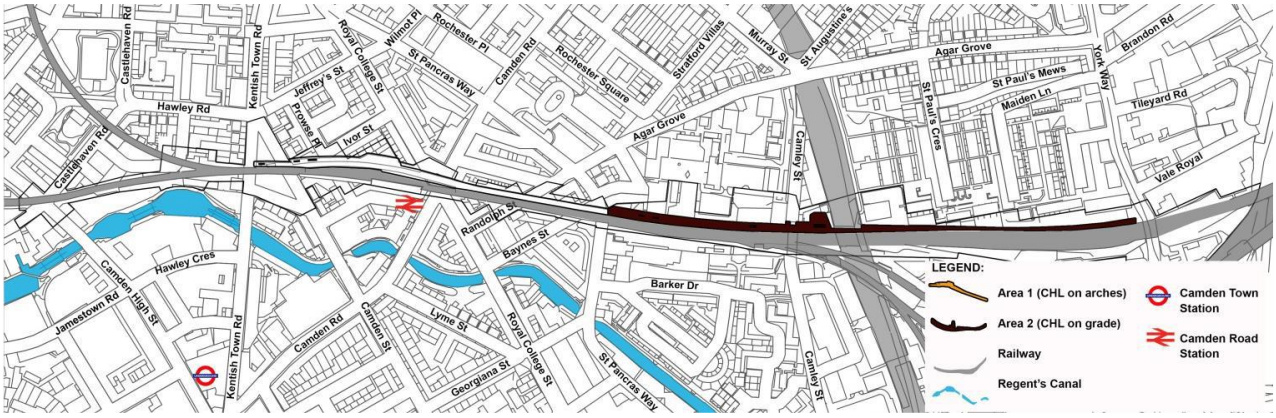

Figure 3: Area 2 Location Plan

Environmental Constraints and Considerations

Due to the linear nature of the site there are a number of environmental and technical/operational constraints and considerations.

There are no sites with European designation within 2 km of the site or National statutory sites. However, Camley Street Nature Park Local Nature Reserve (LNR) is located approximately 550 m south of the site. In addition, there are 52 Sites of Importance for Nature Conservation (SINCs) within 2 km of the site. The closest are:

- Regent's Canal (Metropolitan importance) 110 m south;
- North London Line in Islington (east) and North London Line in Islington (west) (Borough Grade 1) adjacent to /overlaps with site at east end;
- Copenhagen Junction (Borough Grade 1) immediately to the east of the site;
- Bingfield Park (Local) within 200 m to the east of the site;
- Thornhill Square (Local) within 500 m to the east of the site; and
- Rochester Terrace gardens (Local) within 300 m to the north of the site.

There are three areas of designated Open Space within or immediately adjacent to the site:

- Agar Grove, immediately north of the eastern end of the site, which has areas of deciduous woodland which are potentially Habitats of Principal Importance;
- North London Line immediately to the south of the eastern end of the site;
- Elm Village on Barker Drive south of the site;
- Camden Gardens at the western end of the site; and
- Canal Land south along the Regents Canal between Baynes Street and St Pancras Way.

Several well-developed biodiverse roofs are present adjacent to site. These provide habitat which is similar to open-mosaic habitat, providing opportunities for foraging, basking and hibernating insects and foraging and nesting birds. Redevelopment of the site has potential to impact on this.

Based on aerial imagery, the site appears to comprise largely of hardstanding with areas of scrub and ephemeral vegetation:

- The majority of site comprises scattered scrub, introduced shrub and ephemeral/short perennial vegetation. A large proportion of this is likely to be butterfly bush *Buddleja davidii*, which is listed on London Invasive Species Initiative (LISI) as an invasive non-native species. However, butterfly bush provides habitat for nesting birds and for invertebrates and is of some ecological importance. Other ephemeral and short perennial herb species are likely to be present.
- Rail tracks, bare ground and roads which provide hardstanding areas.

Based on experience, it is likely that these habitats would be of Negligible to Local Level ecological importance, although this would be confirmed during further surveys.

Scattered scrub, introduced shrub and ephemeral/short perennial vegetation combined with areas of bare ground with rubble and metal elements are likely to provide habitat suitable for use by a range of common invertebrate species. It is unlikely that rare invertebrate species would make use of the habitat. It is considered likely that the site would be of Site to Local Level ecological importance for use by invertebrates. This would be confirmed following further surveys.

Scattered scrub, introduced shrub and the structures forming the site including rail arches, staircases and buildings have potential to be used by common breeding birds. It is unlikely that rarer bird species would be present on the site.

Rail lines in London can provide habitat suitable for use by common reptile species. The likely suitability of the site will depend on its connectivity to habitats in the wider area. Aerial imagery suggests that the habitat is relatively isolated, and although it comprises a linear rail line, there is not continuous vegetated areas which would allow reptiles to disperse across the area, and therefore it is considered unlikely that reptiles would be present on-site.

There are records of two European Protected Species mitigation licences within 2 km of the site. These are for a soprano pipistrelle non-breeding bat roost dating from 2017 located approximately 1.5 km south of the site, and a common and soprano pipistrelle non-breeding roost dating from 2012 located approximately 1.5 km south-west of the site.

The structures forming the site including rail arches, staircases and buildings have potential to be suitable for use by roosting bats. The linear nature of the site with scrub habitat provides a potential foraging and commuting resource for bats. The suitability of the site for use by roosting, foraging and commuting bats would be confirmed following the completion of further surveys.

According to the British Geological Survey (BGS) mapping, the site is directly underlain by solid geology of the London Clay Formation (clay, silt and sand).

In respect of flood risk, the site is located completely within Flood Zone 1.

The site is not located within a designated Camden Archaeological Priority Area (APA). The closest APA to the site is the Regents Canal and Rail Infrastructure APA to the south-west and the Kentish Town APA to the north.

The western end of the site is located within two conservation areas (Jeffrey's Street and Camden Broadway) and adjacent to a third conservation area (Regents Canal).

The site contains a Grade II listed building (Listing Entry Number 1244154) which is located at 223 Royal College Street to the north of the viaduct. This building is characterised by a projecting classical arched entrance with a pair of four-panel doors below fanlight and the cornice has guttae of cut brick. The building previously contained a staircase and was utilised as an exit for Camden Road Station. It is understood that the building currently serves as a workshop. There are various listed buildings in close proximity to the site, in particular around Camden Gardens on the western end.

In respect of visual amenity, the site is located within two designated London View Management Framework (LVMF) views, namely views 2A.2, Parliament Hill towards the Palace of Westminster and 3A.1 Kenwood towards St Paul's Cathedral.

The entirety of the LBC is an Air Quality Management Area (AQMA). The main source of air pollution within the immediate vicinity is likely to be from vehicles emissions. This is likely to be most concentrated in close proximity to the main arterial roads. These roads include:

- Kentish Town Road;
- Camden Street;

- Royal College Street;
- St Pancreas Way; and
- York Way.

The site is located in an area characterised by road traffic noise.

Figure 4 show some of these environmental considerations in plan format.

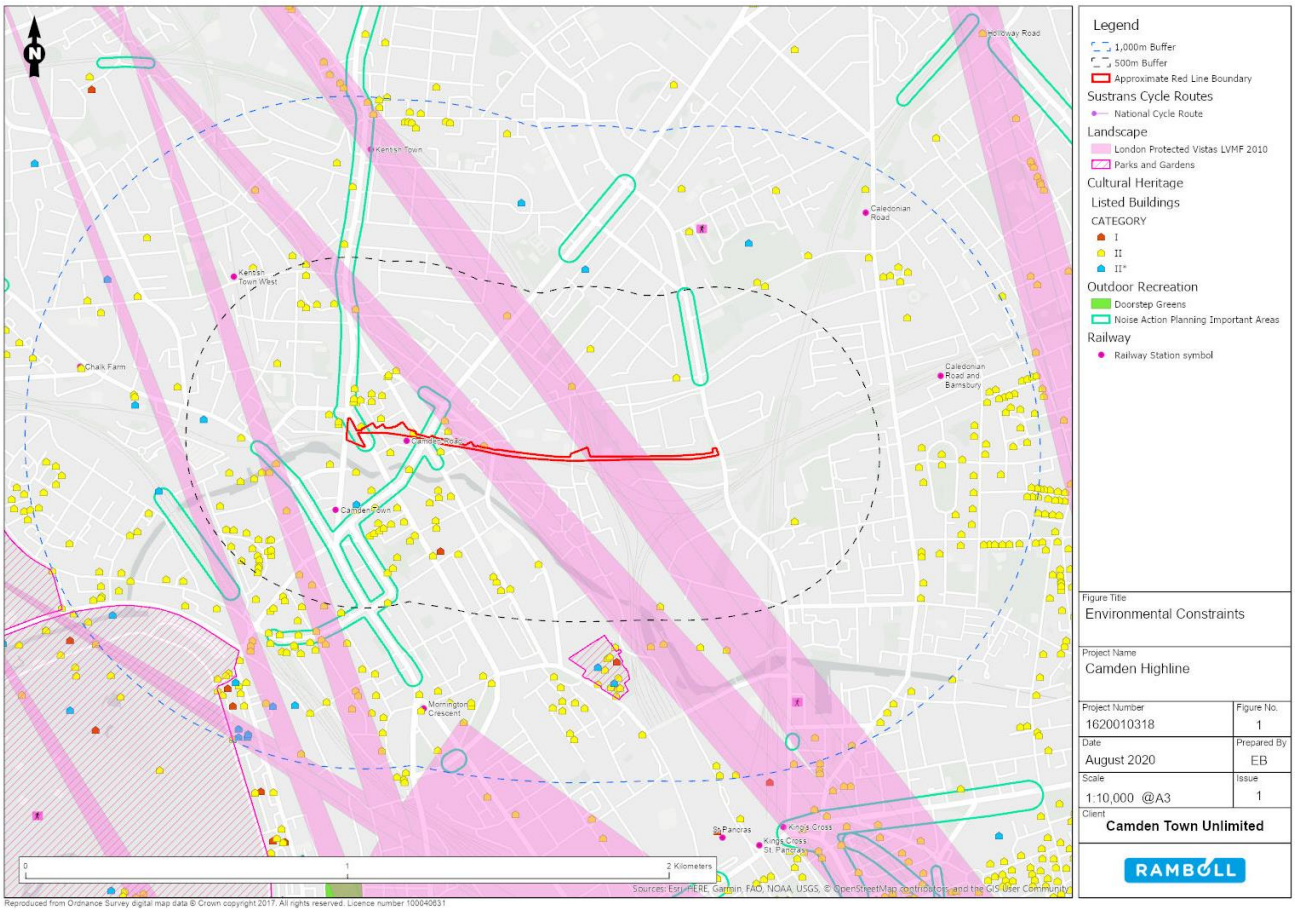

Figure 4: Environmental Considerations

4. PROPOSED DEVELOPMENT

The proposed development would comprise the delivery of new public realm and open space, including a pedestrian walkway, seating areas and landscaping; four access points and four new A3/B1 commercial premises. The aim of the proposed development is to directly connect Camden Town and King's Cross adding a significant pedestrian link and linear public open space to the highly populated area of Camden Town.

The walkway would be a minimum of 3.5 m wide to comply with NR safety requirements. The majority of the proposed development would be between 4 – 20 m wide. Between Camley Street and York Way there is approximately 150 m where there is currently insufficient horizontal space to meet the 3.5 m minimum width. Where this is the case it is proposed that the additional space can be met by including a small area of Agar Grove to the north. Works undertaken in this area would be as minor as practicable and would avoid the removal of trees wherever possible.

Seating areas would be provided in several locations along the length of proposed development.

A separation wall would be constructed between the walkway and the live railway line, in accordance with NR's height standards (a minimum of 2 m). This wall would comply with all NR's requirements for safe operation of their infrastructure.

Access would be provided by means of stairs and lifts at the following four locations (listed from east to west):

- York Way;
- Camley Street;
- Royal College Street; and
- Camden Gardens.

Three new commercial units (likely to be classes A3 or B1) would likely be provided. These units would be provided in the existing railway arches within Camden Gardens which are currently open and provide pedestrian access. This would create approximately 500 m^2 of new commercial floor space. A potential fourth unit is proposed be an A3 'pavilion-like' structure on the Highline itself. It would be located at the widest part of the walkway, adjacent to the Camden Road station.

Small scale demolition works may be required to clear the site and create access points. Otherwise the following works are likely to be required:

- Existing vegetation clearance;
- Relocation and Fencing of Relay Rooms, as necessary, to ensure minimum NR clearance requirements;
- Rerouting/relocation or removal of Power and Telecoms Cables and Overhead Lines, as necessary, to ensure continued operation of the Overland Rail line and the safety of pedestrians;
- Reinforcement/repair of bridges as required, including installation of decks at three bridges. It is not anticipated that the works would require extensive/complex engineering solutions due to the low load bearing pedestrian use;
- Construction of separation wall;
- Construction of access stairs and lifts, including consideration of existing utilities;
- Restoration and internal reconfiguration of 230 Royal College Street listed building to fit stairs and an elevator to provide access;
- Construction of public realm including paving, installation of street furniture, landscaping;
- Conversion of railway arches; and
- Construction of small pavilion

5. CHARACTERISTICS OF POTENTIAL IMPACTS AND LIKELY EFFECTS

Representation on need for an EIA

Regulation 2 of the 2017 EIA Regulations defines 'EIA Development' as that falling under Schedule 1, where EIA is mandatory, or within Schedule 2 where only development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

The proposed development does not fall under the description of a Schedule 1 Development, as defined by the 2017 EIA Regulations that would automatically require a formal EIA.

As the type of proposed development falls within Schedule 2 'urban development project' (category 10(b)), applicable screening thresholds require consideration. The applicable screening thresholds for this type of development is as follows:

- The development includes more than 1 ha of urban development which is not dwelling/house development; or
- The development includes more than 150 dwellings; or
- The overall area of the development exceeds 5 ha.

It is anticipated that the proposed development would be assigned a *sui generis* use class. In addition, 500 m^2 of A3 or B1 would be delivered. At approximately 1.2 ha in total this exceeds the 1 ha threshold set out in criterion 1; however, it is considered that the proposed development does not constitute new 'urban development' within the context of the above legislation. In addition, the proposed development would not have an urbanising effect. It is therefore considered that the proposed development does not exceed the threshold set out within schedule 2 of the 2017 EIA Regulations.

The proposed development also does not fall within the 150 dwellings or 5 ha site area criteria.

However, given the unusual nature of the proposed development, it is considered prudent to undertake a screening process to reach agreement with the LBC that the proposed development does not constitute EIA Development. Through this screening process, it is demonstrated in the next section that significant effects on the environment by virtue of factors such as nature, size or location are not expected.

6. POTENTIAL ENVIRONMENTAL EFFECTS

Developments which fall under Schedule 2 of the EIA Regulations are not always subject to EIA as explained above. Presented below is justification that the proposed development is not expected to give rise to significant environmental effects and as such would not require an EIA. The characteristics of the proposed development and its location, as described earlier in this letter, have been considered when assessing the potential impacts and likely significant environmental effects of the proposed development.

Socio-Economics

The site principally comprises the disused and derelict parts of a Network Rail overland railway line. Area 1 includes railway arches occupied by small scale commercial uses. These uses would not be directly affected by the proposed development. Apart from these uses and the public transport services, no other socio-economic benefits are derived from the site.

During demolition and construction, the proposed development would give rise to temporary direct job opportunities and secondary spending benefits in the local economy. Upon completion and operation, the three converted railway arches and one new commercial unit would provide small scale employment opportunities.

The provision of a new pedestrian link and additional areas of open space would be beneficial to the local community in respect of health (providing opportunity for outdoor exercise, improved access to areas of employment, socialising, etc). Furthermore, there is potential for the proposed development to act as a catalyst for wider urban regeneration. Whilst beneficial, the effects are unlikely to be of a significant scale.

The three railway arches would be appropriately designed to activate frontages to Camden Gardens. Sufficient alternative means of pedestrian access would remain along Kentish Town Road and Camden Road.

The Applicant commissioned Regeneris[1] to undertake a benefits analysis of the proposed development. Regeneris conservatively estimates the total quantified benefits of the proposed development to be at approximately £225 m over a 20-year operation period, with approximately £92 m of this being aggregable gross value added (GVA) benefits to the local (Camden) economy. Consideration was given to the following six 'impact topics':

- Construction and operational impacts: direct employment and business benefits;

[1] Regeneris, 2018. Camden Highline Benefit Analysis.

- Development and property impacts: uplift in existing residential and commercial properties and future development values;
- Benefits to Camden's economy: expenditure impacts from additional visitors;
- Benefits for users: travel and safety benefits, health and wellbeing impacts;
- Environmental impacts: ecological, heritage & townscape, and noise & air quality impacts; and
- Public sector benefits: changes to business rates and council tax returns and health service expenditure.

Accordingly, no significant adverse socio-economic effects would arise from the proposed development.

Archaeology

The site is not located in a designated APA and principally comprises the disused and derelict parts of a Network Rail overland railway line which was constructed in the 1850s. Construction of the viaduct and raised soil embankment would have removed potential archaeological resources within the footprint of the viaduct and embankment. Therefore, it is considered that the potential for buried archaeological features within the site or its immediate surroundings is low. In addition to this, with the exception of a small number of lift pits (approximately four in number) and shallow foundations for stairs, the proposed development would not require extensive earthworks, excavations.

Given the low potential for archaeological features on-site and the localised nature of the minor excavation works, mitigation measures are unlikely to be required during the demolition and construction works. However, if necessary, it is considered that any potential archaeological impacts arising as a result of the proposed development on any archaeological remains could be successfully mitigated by an archaeological watching brief to be maintained during the construction works, secured by means of an appropriately worded planning condition. An Archaeological Desk Study of the proposed development would accompany the planning application and would confirm the most appropriate archaeological mitigation to be adopted during the construction works, if any is necessary.

Upon completion and during the operation of the proposed development, no impacts or effects on archaeological resources would arise.

It is therefore considered that significant archaeological effects are not likely to arise from the proposed development.

Transport and Accessibility

During the demolition and construction works, access and routing of heavy goods vehicles (HGV) would be co-ordinated and agreed with the LBC and Transport for London (TfL), with standard good transport practice implemented through a Construction Logistic Plan (CLP) and Construction Environmental Management Plan (CEMP) to minimise adverse effects to the local highway network, drivers, pedestrians and cyclist. The CLP and CEMP would be secured by means of appropriately worded planning conditions.

The proposed development would not include provision for vehicular parking or access and is intended to be utilised exclusively by pedestrians. The proposed development would encourage pedestrian mobility and permeability within the local area and therefore supports sustainable transport patterns. During the operational stage, the proposed development would not generate additional traffic, with the exception of deliveries to the four aforementioned commercial premises, which are expected to be minor.

Loss of connectivity due to the 'infill' of the three railway arches would not significantly affect pedestrians as sufficient walkways are located along Kentish Town Road and Camden Street.

A Transport Statement for the proposed development, would be produced to accompany the planning application.

It is therefore considered that significant transport or accessibility effects are not likely to arise from the proposed development.

Air Quality

The site is located entirely within the LBC AQMA. This AQMA was designated due to exceedances in the relevant air quality standards for annual mean nitrogen dioxide (NO_2) concentrations and 24-hour particulate matter (PM_{10}) concentrations. Emissions from road traffic is identified as the major source of pollution in the borough.

The proposed development may temporarily affect local air quality as a result of the demolition and construction works through dust emissions and emissions from HGVs. However, works would be governed by a CEMP. This document would set out best practice measures and on-site processes to ensure that air quality and dust emissions from all sources would be effectively controlled during the construction process. The proposed development would not include provision for vehicular parking or access and is intended to be utilised exclusively by pedestrians. No energy plant would be introduced that could give rise to emissions to air; however, the proposed development would introduce new air quality sensitive receptors to the site upon completion and operation. However, exposure would be short term and no different from pedestrians walking along Camden High Street, for example.

The key source of air pollutants within Camden is road traffic. Due to the elevated location of the public realm that would be delivered, pollutant concentrations would be less than at street level.

It is therefore considered that significant air quality effects are not likely to arise from the proposed development in respect of local air quality or human health.

Noise and Vibration

The site is located in an area already characterised by road traffic noise.

The proposed development may temporarily affect local noise and vibration levels as a result of the demolition and construction works and HGV movements. However, as with Air Quality above, works would be governed by a CEMP which would be secured by means of an appropriately worded planning condition. This document would set out best practice measures and on-site processes to ensure works are undertaken at times least susceptible to noise and vibration and timetable vehicle trips to prevent significant increases in local noise levels. Best practicable means (BPM) would be adopted in respect of minimising plant noise emissions.

During operation, the proposed development would not cause an increase in noise or vibration levels. The public realm would be carefully designed having regard to immediately surrounding sensitive residential use and sources of vibration, as well as having regard to outdoor amenity guidance levels. The proposed separation wall would act as a noise barrier to passing train noise.

It is therefore considered that significant noise and vibration effects are not likely to arise from the proposed development.

Ground Conditions and Contamination

With the exception of a small number of lift pits (approximately four in number) and shallow foundations for stairs, the proposed development would not require extensive earth works or excavations.

Standard best practice controls would be employed during the demolition and construction works to minimise the risk of accidental spills. These controls would be implemented in accordance with the CEMP to be secured by means of an appropriately worded planning condition.

A Contamination Land Assessment of the proposed development would accompany the planning application to consider risks to human health and controlled waters; however, it is not anticipated that remedial works would be required.

Upon completion and during the operation of the proposed development, no impacts or effects on ground conditions or contamination would arise.

It is therefore considered that significant ground and contamination effects are not likely to arise from the proposed development.

Water Resources and Flood Risk

Interpretation of the Environment Agency's flood map indicates that the entire site is located within Flood Zone 1 which represents land assessed as having less than a 1 in 1,000 (0.1%) annual probability of flooding from the sea. In addition to this, the elevated position of the majority of the site further reduces the likelihood of flood occurrence.

The assessment of flood risk is regulated through planning policy, with the key requirements for flooding outlined within the 2019 National Planning Policy Framework (NPPF). The NPPF sets out at paragraph 163 footnote 50, that a Flood Risk Assessment (FRA) should be submitted with planning applications for all sites over 1 ha in area and all sites within Zones 2 and 3 to determine the risks of flooding from all sources (including rivers, sea, sewers and groundwater). As the site exceeds this 1 ha threshold, there is a requirement to produce an FRA, and therefore, an FRA would be prepared and would accompany the application.

There are no surface water features on-site, the closest is Regent's Canal located approximately 20 m to the south of the site, at its closest point.

During the demolition and construction works, ground level excavation works would be limited to the installation of access infrastructure. Accordingly, the risk of mobilising contaminants is considered low. On-site activities would be effectively controlled by means of a CEMP including employing standard prevention and management practices and regulatory requirements to avoid accidental spills. The CEMP would be secured by means of an appropriately worded planning condition.

Surface water drainage would be dealt with via the development of a Drainage Strategy which would consider appropriate sustainable drainage systems (SuDS) as appropriate, given the existing drainage infrastructure within the site.

It is therefore considered that significant water resources and flood risk effects are not likely to arise from the proposed development.

Ecology

The likely importance of the site and adjacent areas for ecological features will be confirmed during a Phase 1 Habitat survey. In the event that the potential for Protected Species is identified during this survey, further Protected Species surveys would be undertaken to confirm their presence and devise appropriate mitigation measures as part of the detailed design process.

However, it is considered unlikely that habitats of greater than Local Level importance would be present on or adjacent to the site, and mitigation for direct loss of such habitat would be implemented through provision of landscape habitat and screening within the proposed development, with the aim of achieving a net gain in biodiversity.

During demolition and construction, the potential for indirect effects on designated sites are likely to be limited to local level effects, which could be reduced through implementation of appropriate mitigation including a CEMP.

Potential effects on invertebrates, birds, reptiles and bats, if confirmed to be on-site, would be mitigated through the:

- appropriate timing of work;
- provision of replacement habitat;
- provision of alternative bat roosts, under licence to Natural England;

- provision of additional foraging habitat; and
- translocation of reptiles to a suitable receptor site to be agreed in consultation with the LBC.

Further surveys would be completed to identify all likely ecological features present on and near the site, and an Ecological Impact Assessment (EcIA) report would be produced. This would provide details on, and commitments to, relevant mitigation and enhancements for ecology at the site.

Once operational the proposed development is unlikely to have an adverse effect on local ecological features, on the basis that an appropriate lighting strategy would be implemented and that habitats are managed.

With the implementation of the above mitigation, it is considered that significant effects are not likely to arise from the proposed development in respect of ecology.

Daylight, Sunlight and Overshadowing

Due to the nature of the proposed development and the low-rise nature of the proposals, no significant effects are likely to arise in respect of daylight, sunlight or overshadowing.

Wind Microclimate

Within London, prevailing winds are predominantly from the south-west during the summer season and from the north-east during the winter season.

The proposed development would not increase the elevation of the existing viaduct and embankment structure. Trees and one pavilion would be introduced. In addition, enclosure of the three railway viaducts would not materially alter the ground level pedestrian microclimate. It is therefore considered unlikely that the proposal would create adverse wind microclimate impacts.

While it is acknowledged that the proposed development would introduce pedestrian receptors to an elevated area, the shielding provided by surrounding development and the relatively low elevation of the proposed development make the potential for wind conditions to impact pedestrian users, low. Nevertheless, the advice of a wind specialist will be sought during the detailed design to ensure that the required strolling, standing and sitting conditions would be delivered.

It is therefore considered that significant wind microclimate effects are not likely to arise from the proposed development.

Waste Management

The greatest potential proposed development would generate waste materials during the demolition and construction stage. These would primarily be from the site clearance, repairs to the bridges, excavation shallow foundations and lift pits. Demolition and construction waste generation would be managed by reference to best practice guidance. As such waste would be segregated, recycled and re-used where possible. Construction materials would also be ordered to minimise waste generation. These practices would form part of a Construction Site Waste Management Plan (SWMP), or equivalent, to be secured by means of an appropriately worded planning condition.

During operation, the proposed development would generate small quantities of waste from the commercial premises e.g. food wrappers, coffee cups etc. It is possible that the proposed development would incorporate a small number of public bins that would be managed by the Applicant in accordance with a Waste Management Plan. This Waste Management Plan will accompany the application.

Based on the proposed development's land uses and minor waste streams, plus the proactive commitment to waste reduction, it is considered that significant waste effects are not likely to arise from the proposed development.

Townscape and Visual

The proposed development comprises the redevelopment of disused and derelict parts of a Network Rail overland railway line. It would deliver an elevated park, providing a unique green space and walking route to King's Cross. The detailed design would be of a high quality and would be agreed in consultation with the LBC and GLA as appropriate, during the pre-application meetings. As such the effect on townscape character and permeability would be beneficial.

In respect of visual amenity, the proposals would be low rise and would therefore not be visible in designated views or any other locally important views.

During demolition and construction, temporary effects in respect of the visibility of demolition and construction plant and works would not give rise to significant effects. A tidy site would be maintained at all times and works hoarded off as appropriate in accordance with the CEM to be secured by means of an appropriately worded planning condition.

Accordingly, it is considered that significant adverse townscape character and visual amenity effects are not likely to arise from the proposed development.

Built Heritage

The site contains a single listed building at 223 Royal College Street (Grade II listed building (Listing Entry Number 1244154)). The building was previously used as a means of access and egress from Camden Road Station onto Royal College Street. This was achieved by means of a staircase which is no longer present.

The proposed development would maintain and restore the street facing facade and any other necessary internal features attributed to the listing while returning the building to its original use. A new staircase is proposed along with an associated lift. It is considered that these works are unlikely to cause substantial harm to the significance of this heritage asset.

In addition to the above a number of listed features located within 500 m of the site some four of which are directly adjacent to the site boundary:

- 57-63, Kentish Town Road, Grade II (Listing Entry No. 1379238);
- 55, Kentish Town Road, Grade II (Listing Entry No. 1379237);
- 162-168, Camden Street, Grade II (Listing Entry No. 1244161); and
- 111-121, St Pancras Way, Grade II (Listing Entry No. 1245850).

Additionally, some 500 m of the viaduct, between Camden Gardens and St Pancras Way, is within or directly adjacent to, conservation areas.

During construction and demolition of the proposed development it is possible that there would be some minor impacts of on the settings of some of these heritage assets. However, these impacts would be temporary and as there would be no material change to the external structure of the viaduct, it is likely that the proposed development would be considered a betterment and therefore would protect and enhance these heritage assets and their settings.

Whilst in operation the proposed development would not create impacts beyond those created during the demolition and construction stage.

A Heritage Assessment would be undertaken, and an associated report would be prepared to accompany the planning application.

It is therefore considered that significant adverse built heritage effects are not likely to arise from the proposed development.

Light Spillage

During demolition and construction, lighting of works during hours of darkness (only during winter hours) would be carefully planned and directed to avoid significant effects to immediately surrounding residential properties and ecological receptors such as bats. These measures would be implemented in accordance with the CEMP to be secured by means of an appropriately worded planning condition.

Once completed and operational the proposed development is unlikely to generate excessive light levels. The site is located within an urban area already characterised by high levels of illumination. It is not anticipated that the proposed development would exceed the ambient sky glow for this locality and therefore, it is not considered that light spillage into areas of residential or ecological sensitivity would be an issue in this locality.

Notwithstanding this, a Lighting Strategy will be prepared and submitted with the application. This document will give consideration to the use of shading devices; the appropriate specification of street and amenity lighting with downward and directional lighting being specified to avoid light spillage onto nearby residential properties; and the integration of lighting control attachments (such as cowls and louvers) to maximise the effectiveness of lighting on-site whilst avoiding adverse impacts.

It is therefore considered that significant light spillage effects are not likely to arise from the proposed development.

Climate Change

The potential for the proposed development to affect the climate would largely be determined by the demolition and construction works of the proposed development, as well as the way the structures are used during operation; however, development and planning can play an important role within the wider determinants of climate mitigation including sustainable design initiatives.

The primary greenhouse gas (GHG) from urban development projects is carbon dioxide (CO_2), set out as CO_2 equivalent (CO_{2e}) to take account of all GHGs collectively, to prevent an understatement of global warming impact.

Due to the nature of the proposed development, it is not likely to give rise to significant levels of greenhouse gas (GHG) emissions that would contribute to climate change. The Applicant will also seek to ensure that the proposed development's design is resilient in respect of climate change (for example in respect of flood risk) and that construction materials are selected following the Building Research Establishment (BRE) 'Green Guide to Specification' to:

- minimise embodied energy content (the energy used in manufacture);
- use recyclable materials where they have high embodied energy; and
- maximise the recycled content of the material, ease of maintenance, appropriate sourcing of materials and totally excluding deleterious and hazardous materials.

The proposed development would also reduce the need to travel by private car, promoting walking instead.

The UK Climate Projections (UKCP09) have produced predictions of climatic changes for the UK, including more intensive summers, milder winters, sea level rise, and more frequent storms and heavy rainfall. Given the location of the site within Flood Zone 1 and consideration of SuDS measures that would be adopted as part of the drainage strategy, the proposed development would be at low risk from increased flooding as a result of climate change.

Furthermore, the Applicant will commit to best practice measures during the demolition and construction stage to minimise potential climate impacts. These measures would be set out within the CEMP, to be secured by means of a suitably worded planning condition.

Accordingly, it is considered that significant climate change effects are not likely to arise from the proposed development.

Human Health

The provision of a new pedestrian link and additional areas of open space would be beneficial to the local community in respect of health (providing opportunity for outdoor exercise, improved access to areas of employment, socialising, etc).

Due to the elevated location of the Highline and short-term exposure, significant air quality and noise effects are unlikely to adversely affect pedestrians. Furthermore, wind microclimate specialists would provide advise during the detailed design process to ensure all pedestrian areas are suitable and safe for their intended use.

Regeneris highlights the following areas of measurable betterment:

- Reduction in collision accidents – some 25 accidents involving pedestrians occurred on roads running adjacent to the proposed development route over the past five years. This is assessed (using the standard DfT WebTAG values) as costing the economy approximately £3.8 m between 2013 and 2018. It is considered that the provision of a pedestrian only amenity area would significantly reduce the potential for collisions within the locality.
- Active Travel – it has been estimated that approximately 400 new 'regularly active' users will utilise the proposed development. The DfT's Active Mode Benefits worksheet enables an economic assessment of the health benefits derived by individuals from having a more active lifestyle. This can be corelated to absenteeism. Those who conduct 30-minutes of daily exercise are 25 % less likely to be absent from work. This would therefore save approximately £33,000 per annum.
- Air Quality - Those pedestrians currently utilising alternative routes to the proposed development are likely to gain health-related benefits from enhanced air quality by using the Highline instead. They will be subject to less direct exposure to vehicle emissions that are prevalent at street level.
- Healthy Lifestyles – Regular walking and cycling to reduce the on-set of a range of chronic diseases, including heart disease, high blood pressure, diabetes, Alzheimer's and cancer. Furthermore, there is also strong evidence that it also tackles mental health issues including depression and stress, as well as generally enhancing mood and improving self-esteem.

While difficult to accurately quantify it is considered likely that the proposed development would be well used and that the above represents a reasonable prediction of potential health benefits.

Accordingly, it is considered that significant adverse health effects are not likely to arise from the proposed development.

Major Accidents and Disasters

The site is also not located within 3.2 km (2 miles) of an establishment that falls under the Control of Major Accident Hazards (COMAH) Regulations 2015 and does not lie within the consultation zones of any COMAH Establishment, and therefore, there is no need to consult with the Health and Safety Executive (HSE) regarding the proposed development.

The site is located in Flood Zone 1 and is therefore at low risk of flooding.

The site is not located within a geographical region that has historically been subject to natural disasters.

It is considered that the majority of major natural disasters, such as epidemics, earthquakes, volcanic eruptions and droughts are not of relevance to the site or proposed development; however, vulnerability to flood risk and storm events is considered to be relevant.

Flood risk will be considered within the FRA, where best-practice mitigation measures will be outlined. Strong winds associated with storm events will be factored into the design of the proposed development in respect of structural integrity and appropriateness of landscaping features. It is considered that no further assessment in respect of natural disasters is necessary.

In respect of major accidents:

- Utility failure or damage (such as electricity, gas, water supply or sewerage) will be avoided through appropriate design and sufficient consultation with utility providers, ensuring that necessary repairs can be undertaken, and continuation of supply ensured;
- NR infrastructure safeguarding will be avoided through appropriate design and consultation;
- Urban fires will be mitigated through appropriate design in accordance with Building Regulations and relevant safety guidance, in addition to the established 999 emergency response procedures in place in Reading; and
- Terrorist incident risk is not considered to be heightened or noteworthy due to the site's location and intended uses of the proposed development.

Based on the above, no significant adverse effects are likely to arise in relation to Major Accidents and Disasters.

Cumulative Impacts

The proposed development is considered unlikely to give rise to significant effects in isolation.

In the event that other projects of a similar or larger scale are approved and are likely to come forward over the same planning period, it is possible that combined effects could arise in respect of the demolition and construction stage, in particular HGV movements on the local highway network. However, the Applicant will co-ordinate with these approved projects to minimise disruption to drivers, pedestrians and cyclist. Furthermore, it is expected that cumulative schemes would implement standard best practice measures within their respective CEMPs and CLPs to avoid the potential for significant environmental effects.

The Applicant is aware of an LBC proposal for approximately 350 new dwellings and 12,000 m^2 commercial space on a site located in Camley Street on either side of the proposed development. This scheme and its design principles are set out in great detail (as a number of 'Core Objectives') within the Camley Street Neighbourhood Development Plan (2019 – 2034). The document refers to the proposed development. The Applicant and the LBC are in discussions to ensure that the proposals not only avoid cumulative impacts but instead provide mutual benefits via complimentary design.

Accordingly, it is considered that significant cumulative effects are not likely to arise from the proposed development.

7. CONCLUSIONS

In summary, environmental effects associated with socio-economics; archaeology; transport and accessibility; air quality; noise and vibration; ground conditions and contamination; water resources and flood risk; ecology; daylight and sunlight; wind microclimate; waste management; townscape and visual; built heritage; light spillage; major accidents and disasters; climate change; human health; major accidents and disasters; and cumulative impacts resulting from the proposed development are not anticipated to be significant.

The proposed development does not involve complex processes and would not result in an urbanising effect. The proposed land uses would be complimentary and consistent with the prevailing context.

Whilst the proposed development exceeds the 1 ha urban development which is not dwelling/house development threshold identified within Schedule 2 of the EIA Regulations, when considering the

selection criteria in Schedule 3 of the EIA Regulations for screening Schedule 2 developments, it is concluded that the proposed development will not result in any significant environmental effects and as such an EIA is not warranted in this case.

Furthermore, the Applicant intends to commission the following stand-alone environmental reports that will accompany the proposed development's application:

- Archaeological Desk Study Report;
- Transport Statement;
- Flood Risk Assessment;
- Ecological Impact Assessment;
- Contamination Land Assessment;
- Heritage Assessment;
- Waste Management Plan;
- Lighting Strategy and Impact Assessment; and
- Sustainability Statement.

Although impacts are certain to occur during the proposed development's implementation, they would be managed by adopting good practice and controls, and through planning conditions, such that sensitive receptors would not be permanently disrupted or harmed.

For these reasons, the proposed development is not considered to be 'EIA Development'.

You will be aware under Regulation 6(6a) that the competent authority has three weeks from receipt of this request to provide a Formal EIA Screening Direction. Accordingly, we would be grateful for your Screening Opinion by 11 September 2020.

Should you have any queries on this letter or require further information, please do not hesitate to get in contact. In the meantime, we look forward to hearing from you in due course.

Yours sincerely

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