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Dear Mr Grayson

**Land at 65 – 69 Parkhurst Road, London N7 0LJ
Request for a Screening Opinion - Regulation 5 of the Town and Country Planning
(Environmental Impact Assessment) Regulations 2011**

We write on behalf of our client, Parkhurst Road Limited, to request a formal Screening Opinion in relation to emerging proposals for the comprehensive redevelopment of the site at 65-69 Parkhurst Road.

We propose to apply for full planning permission for a residential redevelopment involving the demolition of the existing buildings and the erection of approximately 150 residential units (Use Class C3); together with associated parking; and landscaping works.

This letter considers whether the application should be subject to an Environmental Impact Assessment (EIA) for the purposes of the above Regulations. In relation to this we enclose:

- A plan sufficient to identify the land (see attached plan);
- A brief description of the nature and purpose of the development and of its possible effects on the environment (see The Site and Surrounding Area and the Proposed Development below); and
- Additional information (see The Screening Process below).

The Site and the Surrounding Area

The site is located in the London Borough of Islington, in a predominantly residential area. The site extends to approximately 0.578 hectares and it is occupied by a number of utilitarian buildings (ranging from 1 to 3 storeys) plus extensive areas of hardstanding associated with its former use by the Territorial Army (TA) as a TA/Reserve Forces and Cadet training centre. The main building fronting Parkhurst Road is a 3 storey brick building which is set back from the street. None of the existing buildings are considered to be of any particular architectural merit.

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The site is reasonably flat, and there are a number of trees around its perimeter. Vehicle and pedestrian access to the site is from Parkhurst Road, although it is a secure site with no public/community access to it.

Parkhurst Road is characterised by a range of residential properties of varying ages and styles. To the north of the site is a post-war local authority housing estate rising to 4 storeys, to the east is Victorian housing with post war local authority housing (3-4 storeys flats/maisonettes) beyond. To the south there are retained TA buildings and post-war private housing (1980's and 1990's) (1.5 – 4 storeys); and to the west is inter-war local authority housing estate building rising to 5 storeys.

The site benefits from excellent access to public transport. It has a Public Transport Accessibility Level of 6a. It is approximately 800 metres northwest of Holloway Road Underground Station.

Policy Position and Background

The site is identified within the Site Allocation DPD (June 2013) as Site NH5, which also includes land which has been retained by the Ministry of Defence (MoD) to provide a Cadet Centre. The allocation states:

“The site is outside of the Nag's Head Town Centre in a predominantly residential area. The majority of the site has potential for intensification for residential accommodation to help meet housing need in the borough. There could be continued Ministry of Defence use on part of the site (regular unit and cadets).”

The Council's Policies Map (2013) does not identify any other site designations; however, the site does adjoin the Hillmarton Conservation Area to the south west, and Parkhurst Road is a designated Cycle Route. The Nags Head Town Centre boundary is located approximately 50m to the east of the site.

Planning permission (ref: P122481) was granted in March 2013 for the construction of a single storey cadet centre to the south of the site on the retained MoD land.

The Proposed Development

The emerging proposals seek to demolish all of the existing buildings on the site and construct buildings rising up to a maximum of five storeys above ground level to provide a residential development comprising approximately 150 residential units. The scheme design is still evolving, but the final proposals will not substantially differ from the emerging proposals used to inform this Screening Request.

It is proposed to provide a building of maximum 5 storeys fronting onto Parkhurst Road with other buildings to the rear formed along the access road and an internal courtyard which will provide

communal amenity space for the future residents. The scheme will also be designed to ensure that all of the homes are provided with private amenity space in the form of balconies, terraces or gardens.

The Screening Process

On 3rd March 1997 the Council of the European Union amended Directive 85/337/EEC through Council Directive 97/11/EC, which was given legal effect in England and Wales through the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 in so far as it relates to development under the Town and Country Planning Act 1990.

The 1997 amending Directive has several purposes including, the introduction of provisions to “clarify, supplement and improve the rules on the assessment procedure” and enabling developers to obtain an opinion from the competent authority on the need for EIA. The Directive also extends the range of projects to which EIA applies and requires an outline of the main alternatives considered to the development proposed.

In addition to the EIA Regulations and Directive, there is a body of guidance that further informs the EIA process, including:

- DETR. (March 1999). Circular 02/99: Environmental Impact Assessment; and
- DETR. (November 2000). Environmental Impact Assessment: A Guide to Procedures.

Development that falls within Schedule 1 of the Regulations always requires EIA and is referred to as ‘Schedule 1 development’. Development listed in Schedule 2 that is located in a ‘sensitive area’ (as set out in Regulation 2(1)), or, exceeds one of the relevant criteria or thresholds given in Schedule 2 is referred to as ‘Schedule 2 development’.

Not all ‘Schedule 2 development’ will require an EIA, only that development likely to have significant environmental effects due to its size, location or nature. Development that requires EIA is referred to as ‘EIA development’. The proposed development falls within the description in Schedule 2 Part 10(b) ‘Urban Development Projects’, where the relevant threshold is 0.5 hectares. This proposal has a site area of 0.578 hectares. Since the site area exceeds the relevant threshold, the test of whether the proposal is EIA development is whether it would have significant effects on the environment by virtue of its characteristics, location and potential impact in the context of the selection criteria set out in Schedule 3 of the Regulations.

It should be borne in mind that paragraph 34 of Circular 02/99 states that: *“The number of cases of such (EIA) development will be a very small proportion of the total number of Schedule 2 developments. It is emphasised that the basic test of the need for EIA in a particular case is the likelihood of significant effects on the environment”*.

Annex A to Circular 02/99 sets out indicative thresholds and criteria for identifying Schedule 2 Development requiring EIA. Paragraph A18 states that “EIA is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use or the types of impact are of a markedly different nature or there is a high level of contamination.” It goes on to note that development on sites which have not been previously developed are more likely to require EIA if it results in a new development of more than 1,000 dwellings or would provide a total of 10,000sq.m of commercial floorspace.

Regulation 4(6) of the Regulations requires screening to be undertaken with reference to the selection criteria set out in Schedule 3 of the Regulations. It is therefore important that these are considered. However, we consider that a more useful framework is set out in Article 3 of the Directive, and the following assessment uses those criteria with reference to the selection criteria in Schedule 3 as appropriate. The relevant selection criteria set out in Schedule 3 are:

- i) Characteristics of development;
- ii) Location of Development; and
- iii) Characteristics of the Potential Impacts.

Further clarification of the relevant criteria are also set out in Circular 2/99. These are also addressed below.

The Circular indicates that the local authorities should first consider the “selection criteria” within Schedule 3 of the Regulations (and Annex A of the Circular). The criteria for Category 10 (b) ‘Urban Development Projects’ are considered in the following paragraphs.

- i) Characteristics of development

Schedule 3 refers to:

- a) Size of the development;
- b) Cumulation with other developments;
- c) Use of natural resources;
- d) Production of waste;
- e) Pollution and nuisances; and
- f) The risk of accidents, having regards to technologies used.

It is considered that the potential for significant effects for the development should be considered against the characteristics which currently exist. The effect attributable to the proposed development therefore is only that over and above that already caused by the former uses on the site.

In respect of the Schedule 3 criteria, it is evident that in general the proposal is in keeping with the existing scale and massing of the surrounding area. With regards to the character of the development, the proposed uses are similar to what already exists nearby.

In terms of cumulative impacts, there is an extant planning permission (ref: P122481) for the construction of a cadet centre on land adjoining the site to the south. This is a small scale development when considered in the local context. The permission is for a single storey community building; therefore, it is considered that this will not result in significant adverse cumulative impacts during construction or operation.

ii) Location of development

The site is located on the northern side of Parkhurst Road in an area of predominantly residential character and use. As described, the site is not located within or adjacent to a 'sensitive area' as defined by the Regulations.

The EIA Regulations define 'Sensitive Areas' as follows:

- Sites of Special Scientific Interest;
- Land to which sub-section (3) of section 29 (nature conservation orders) of the Wildlife and Countryside Act 1981 applies;
- Areas to which paragraph (u)(ii) in the table in article 10 of the Town and Country Planning (General Development Procedure) Order 1995 applies;
- National Parks;
- The Broads;
- Properties appearing on the World Heritage List;
- Scheduled Ancient Monuments;
- Areas of Outstanding Natural Beauty;
- European sites within the meaning of regulation 10 of the Conservation (Natural Habitats etc) Regulations 1994.

The site does not lie within or adjacent to any of these sensitive areas.

iii) Characteristics of Potential Impact

The extent of potential impacts is likely to be localised, affecting a relatively small population. Moreover the magnitude, probability and complexity of any impacts on the environment will be low, given the proposed use of the site. The characteristics of the development are considered in further detail below.

Human Beings and Material Assets

Society, History and Economics

The site is surplus to requirements; therefore, is no longer required by the TA. It currently comprises vacant buildings and extensive areas of hardstanding.

The proposals for a residential development are supported by the designation set out in the Site Allocations DPD. It is proposed to deliver approximately 150 residential units in a mix of unit sizes and tenures. A proportion of the housing will be provided as affordable housing; and this provision will be maximum reasonable amount that can be delivered taking account of viability issues.

The introduction of residential units to the site is likely to result in an increase in demand on social infrastructure, such as local schools and GP services. The proposed development will include some affordable housing and therefore a proportion of the future occupiers of the scheme are likely to be already living within the borough and therefore the overall demand on social infrastructure will be reduced. Given that the number of dwellings proposed is not considered to be significant, it is not anticipated that the additional demand on the surrounding area will result in a significant effect in the context of the wider borough provision.

An analysis has been undertaken of the local primary and secondary school facilities and this indicates that there is capacity to accommodate more pupils. There are several primary schools within a walking distance of approximately 1 mile of the site. The January 2012 school census data indicates that there is capacity within 8 primary schools within a mile of the site.

With regards to secondary school facilities, the January 2012 school census data indicates a surplus capacity for 982 children in the schools within 1 mile of the site, which includes capacity for 106 children at the Holloway School which is located to the west of the site within a 12 minute walking distance.

This analysis has been undertaken using Edubase which is a register of all educational establishments in England and Wales, maintained by the Department for Education. For this particular site, it demonstrates that there is capacity in the area for additional primary and secondary school pupils.

It is difficult to quantify the additional demand on health care provision, in particular that of GP services as often people fail to re-register in their new locality. However it is not anticipated that the number of residential properties will create a significant demand on local health care provision.

The site is located in close proximity to Nags Head Town Centre and it has an excellent PTAL rating, therefore residents and employees will be within walking distance of local amenities, services and public transport links. The development has the potential to increase local spending power and contribute to the local economy of the area.

Notwithstanding the matters discussed above, any additional demand placed on social infrastructure will be addressed through the preparation of a Section 106 Agreement within which appropriate contributions towards social infrastructure can be secured subject to need. Any such contributions will be the subject of negotiation with the London Borough of Islington during the course of the planning application and this is an appropriate and typical method of addressing any deficit in the provision of social infrastructure. As such no significant impacts are anticipated. Some of these issues will be considered and assessed within the Health Impact Assessment which will be submitted in support of the planning application.

Transportation

The site is located in an area of excellent access to public transport and this is clear from its PTAL rating of 6a (which is the second highest achievable). There are several bus stops in close proximity to the site, and these provide access to over 10 bus routes. The site is within walking distance of Holloway Road Underground Stations (approx. 850m) and this provides access to the Piccadilly line, only two stops from King's Cross St Pancras Underground, Rail and Eurostar station.

Parkhurst Road (A503) is also a major thoroughfare, which links directly to the Holloway Road (A1) when turning left out of the site entrance. The only vehicle and pedestrian access to the site is from Parkhurst Road. Parkhurst Road is also designated as a Cycle Route on the Councils' Policies Map.

The proposals will be predominantly car free. A Green Travel Plan will also be implemented which will include a comprehensive package of sustainable travel initiatives.

The planning application will be supported by a Transport Statement which will consider the impact of the development in the context of the surrounding area to ensure that there will be no negative impacts resulting from it. A Draft Travel Plan will also be submitted.

Noise and Vibration

The planning application will be supported by a Noise Assessment which will consider the impact of traffic noise from Parkhurst Road on the living environment of the new residents on the site. Appropriate mitigation measures will be recommended within the assessment and can be secured appropriately using planning conditions which can be attached to the planning permission.

The proposed residential uses are compatible with the surrounding areas, and is not a noise-generating use; therefore, the proposals are unlikely to have significant noise effects, which cannot be adequately controlled by planning conditions.

Production of Waste

The proposals are unlikely to result in a significant increase in the levels of household waste, particularly given the initiatives promoted by local and regional planning policies to minimise waste and encourage recycling. Appropriate storage space for domestic refuse and recycled waste will be provided within the development, details of which can be secured under planning condition.

The current buildings on the site will be demolished and a pre-demolition survey could be conducted to identify whether any materials can be reused in the new development and where this is not possible, maximise the materials that can be stream separated and recycled. It is proposed that a Site Waste Management Plan will be submitted with the planning application.

Flora and Fauna

The site is not located within, adjacent to or in proximity to any ecologically sensitive area or site of nature conservation and does not contain any features that are likely to contain habitats for flora or fauna. Notwithstanding this, a Phase 1 Habitat Survey will be undertaken and will form part of the application submission.

There are trees located along the perimeter of the site boundary. A Tree Survey and Arboricultural Impact Assessment will be submitted with the planning application. Given the location of the site, existing uses and limited habitat for foraging, the site is unlikely to provide suitable habitat for protected species; therefore it is anticipated that there will be a negligible impact.

Soil and Water

Land Contamination

A land quality assessment has been undertaken for the site. The investigation results indicate that much of the site is free from contamination; however, localised areas of soil contamination may be present associated with an underground fuel storage tank, heating oil storage tank, drum stores, workshops/garages, demolished buildings and the electrical substation.

A Phase 1 contamination study will be submitted with the planning application. If necessary, a planning condition could be attached to the planning permission requiring site investigation and, if required, appropriate remediation.

Hydrology & Flood Risk

The site is not located within a groundwater source protection zone and the Environment Agency Flood Map shows that the entire site is located within Flood Zone 1 (land assessed as having less than a 1 in 1000 annual probability of flooding from rivers). Therefore, all uses of land are appropriate in this zone.

Opportunities for the inclusion of green roofs will be explored as part of this new development and planning conditions can be attached to the planning permission to secure these if it is appropriate to deliver them on this site.

Air and Climate

Air Quality

The whole of the borough is located within an Air Quality Management Area (AQMA) and the declared pollutants are Nitrogen dioxide (NO₂) and Particulate Matter (PM10). Other than providing disabled car parking and bays for servicing requirements, the residential element of the development is car free.

Notwithstanding the above, if required Air Quality Assessment can be secured by planning conditions attached to the planning permission to consider the impact of the Parkhurst Road thoroughfare on the internal environment of the new homes, and to consider any impacts arising from the energy strategy which is likely to include Combined Heat and Power (CHP) plant.

Daylight, Sunlight and Overshadowing

A detailed Daylight and Sunlight Assessment will be undertaken in support of the new proposals in accordance with the BRE Guide to ensure that there are no significant adverse impacts on surrounding properties. Preliminary assessment work has been used to inform the emerging layout, scale, bulk and massing of the development proposals.

Microclimate

The effect of ground surface friction means that wind speed generally increases with height. Consequently, impacts arising from wind are usually associated with large buildings over 11 storeys in height which can cause windward vortexes where the wind blows perpendicular to the building and is diverted downward to ground level. The tallest building is proposed to be 5 storeys in height; therefore, no adverse microclimatological effects are anticipated.

Townscape and Visual Amenity

The area surrounding the site is varied but of a predominantly residential character. None of the buildings on the site are considered to be of historic significance and are not considered to be worthy of retention. Therefore by comprehensively redeveloping the site, it is considered that this will enhance the overall visual amenity of the local area and the wider area.

The scale of the proposed buildings is deemed appropriate in relation to the existing building heights along Parkhurst Road and in the surrounding area. A conservation area adjoins the site; therefore, the proposals will be developed to take into account the character of the conservation area.

The planning application will be supported by a Design and Access Statement that will appropriately consider the heritage impact of the proposals.

Cultural Heritage

Archaeology

The site is not located in an Archaeological Priority Area. It is therefore considered that there are unlikely to be any archaeological remains of national, regional or other importance present on the site. No further archaeological investigation will be required as part of this proposal.

Built Heritage

No part of the site lies within a Conservation Area and there are no listed buildings on the site. The Hillmorton Conservation Area adjoins the site to the southwest and there are locally listed buildings along Parkhurst Road. There are no statutory listed buildings in close proximity to the site. Given the location of the site and the scale of the proposals, it is unlikely that the proposals will have any significant adverse impact on the local heritage assets.

These issues will be considered in the Design and Access Statement that will be submitted in support of the planning application.

Construction

There is likely to be some release of dust and increase in noise from equipment and activities during construction. A Code of Construction Practice (CoCP) or a construction and Environmental Management Plan (CEMP) will ensure that any construction activities will be in accordance with environmental protection legislation which will limit disturbance from construction activities as far as reasonably practicable. As such it is considered that the construction of the development will not significantly impact upon neighbouring residents.

This can be further regulated through standard planning conditions to ensure that local amenity is not significantly reduced.

Cumulative Development

As noted, there is an extant planning permission (ref: P122481) for the construction of a cadet centre on land adjoining the site to the south. This is a small scale development when considered in the local context. The permission is for a single storey community building; therefore, it is considered that this will not result in significant adverse cumulative impacts during construction or operation.

The scale of development proposed on this site in the context of the surrounding area and the proposed uses are such that, it is considered that they are unlikely to give rise to significant cumulative impacts

Notwithstanding the above, the following technical reports will be submitted with the planning application:

- Town Planning Statement;
- Design and Access Statement;
- Daylight and Sunlight Assessment;
- Noise Assessment;
- Transport Statement and draft Travel Plan;
- Tree Survey and Aboricultural Impact Statement;
- Phase 1 Contamination Study;
- Phase 1 Habitat Survey;
- Sustainable Design and Construction Statement;
- Energy Statement;
- Site Waste Management Plan; and
- Health Impact Assessment.

Summary

The site meets the size threshold provided by Schedule 2 of the Regulation. Taking account of the above, we consider that the proposed development will not give rise to significant effects on the environment with regards to the characteristics of the development, its location, and the potential impacts, and that therefore the planning application will not constitute EIA development. We request that in accordance with regulation 5 of the 2011 Regulations, the Council confirm that they share this view, and we look forward to receiving a Screening Opinion from you within the requisite 21 days.

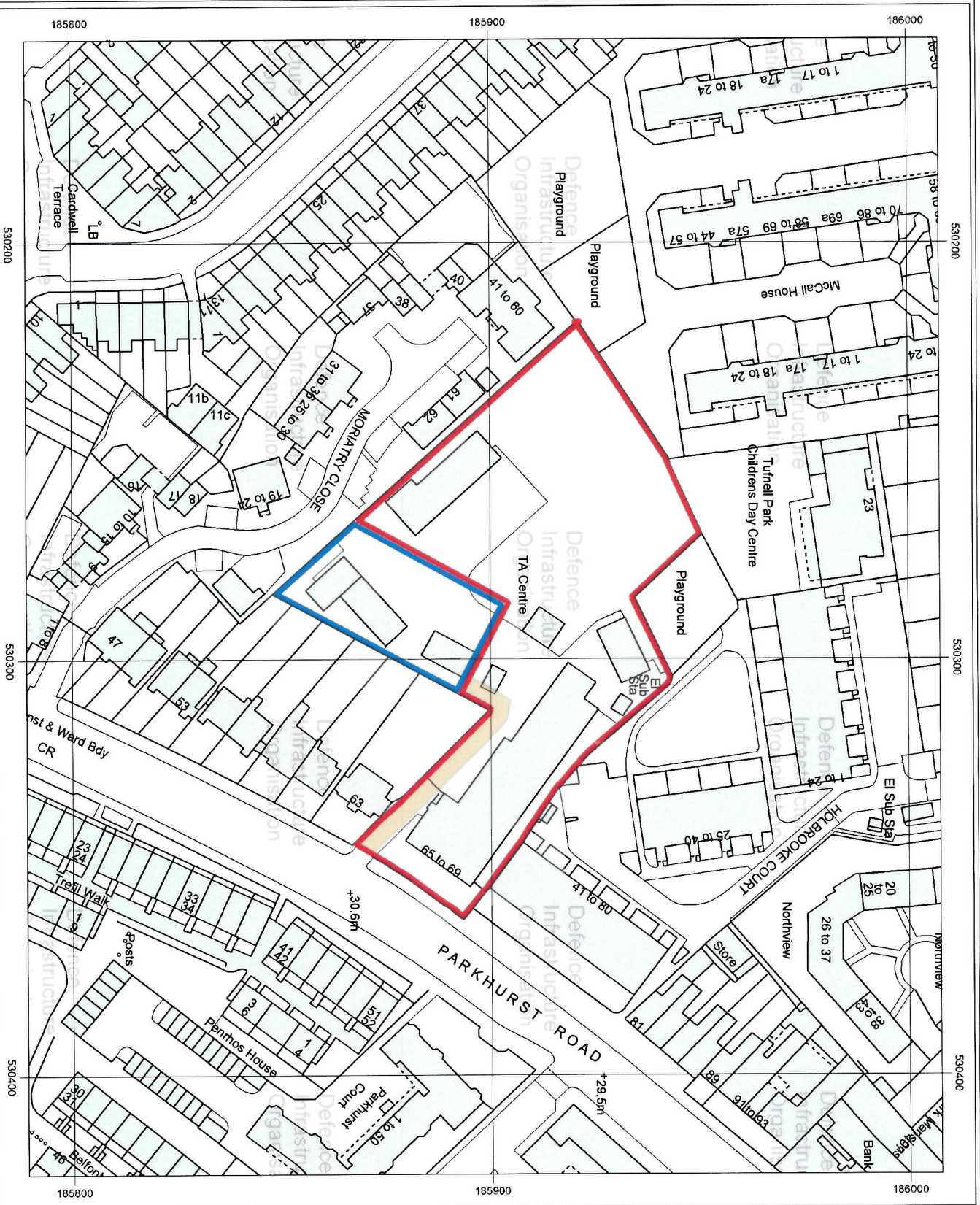
Should you require any further information to provide us with a screening opinion please do not hesitate to contact me.

Yours sincerely



Eve Campbell
Associate Director

cc. Andy Pollard, Parkhurst Road Limited



MINISTRY OF DEFENCE
TA CENTRE
ISLINGTON

- The Site (0.578 Ha)
- Retained Area (0.113 Ha)
- Access Route (Proposed)

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