

14 November 2016



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Dear Sir

**Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (As amended)
Regulation 5 - Request for an EIA Screening Opinion.**

Proposed development of up to 540 dwellings on land at The Icon site, Lytton Way, Stevenage

Further to pre-application meetings with the Borough Council regarding emerging development proposals for the Icon Site at Lytton Way in Stevenage, we are writing to request the formal EIA screening opinion of Stevenage Borough Council in accordance with Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 as amended. Our client, Hill Residential Limited, is considering the submission of a detailed planning application at the appropriate time for the proposed development of some 540 new homes on land known at The Icon site, Lytton Way, Stevenage.

As required by Regulation 5(2) this letter and enclosures provide:

- a plan sufficient to identify the land;
- a brief description of the nature and purpose of the development; and
- a brief description of the possible effects on the environment of the development.

The Site

The site identified by the red line on the enclosed plan extends to approximately 2.7 hectares of previously developed land comprising large office buildings on what is known as The Icon site. The office buildings were constructed in 1989 and they are considered to be recognisable features within the urban landscape. The building footprint is multi angled with large glazed elevations which step in as the building rises and comprise a large ground floor reception and a full height atrium area. The structures provide for undercroft car parking as well as additional open parking areas and well maintained green landscaped spaces around the edge of the site.

The site lies to the south west of the Old Town and to the north west of the New Town and effectively is located within a zone of transition between commercial and employment areas and residential zones to the west. The site lies in close proximity to the railway station which lies immediately to the south about 5 minutes walk with the railway line effectively forming the western boundary to the site.

The development proposed

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For the purpose of EIA screening, the proposal is for a detailed planning application for the residential development of the site for some 540 dwellings with access taken from the existing access point at Lytton Way

The scheme design is currently at an advanced stage and the project team have been engaging with the Council's officers in the context of the formal pre-application process. The work to date by the project team has discussed the principle of residential development on the site and considered a series of options for the redevelopment for new housing in the form of residential blocks. This has included a careful and detailed assessment of the site and its surroundings and the identification of a set of development principles worked up to a set of illustrative plans for a single option supported by technical reports. The publication of the officer's pre-application response dated the 13th October 2016 following our meeting with Officers on the 15th September 2016 provides sufficient comfort to our client that the plans prepared to date are sufficiently advanced to merit the submission of this request for Screening.

The enclosed document provided for the purposes of Screening contains commentary on the plans prepared by the client's appointed architects and which are intended to form the basis for a detailed application for some 540 dwellings at the appropriate time. The plans show a layout of 7 residential blocks comprising a total of 540 dwellings. The tallest elements of the proposed development are at either end of the site and comprise a 16 storey block at the southern end with a 15 storey block at the northern end. Smaller secondary buildings are located between the two ends. With the site benefitting from existing mature trees and grassed banking particularly along Lytton Way, it is intended to retain these features as far as possible with the new layout. As stated above, it is intended that the existing vehicular access point is retained within a new layout - a new entrance leads into a new plaza in the centre of the site with a new tree lined street proposed to run north-south with car parking areas either side set adjacent to new planting proposals. New green areas are proposed between those blocks fronting Lytton Way with green amenity space created within the site and adjacent to Block 7.

Appropriate consideration will be given to all applicable Development Plan policy criteria at the time of the submission of any planning application. This will include the protection of neighbour amenity, the provision of sustainable buildings and drainage, highway and access proposals and the incorporation of public open space and landscaping. Affordable housing would be included within our proposals.

Consideration of the need for Environmental Impact Assessment

Schedule 1 of the EIA Regulations identifies development types which require EIA in all cases. Schedule 2 identifies development types where, if the relevant threshold criteria are exceeded, further consideration is required (with reference to Schedule 3) in order to determine whether EIA is required.

We consider that the scheme falls within Part 10 (b) of Schedule 2 'Urban Development Projects'. Schedule 2 states that where the area of development includes more than 1 hectare 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 hectares, it is necessary to consider whether an EIA is required.

Development proposals described under Schedule 2 require an EIA if they are considered to have a significant impact upon the environment by virtue of factors such as nature, size and location. PPG (Paragraph: 018 Reference ID: 4-018-20140306) highlights that:

"Only a very small proportion of Schedule 2 development will require an assessment. While it is not possible to formulate criteria or thresholds which will provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment. It is also possible to provide an indication of the sort of development for which an assessment is unlikely to be necessary...."

It goes on to state:

“.....However, it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits.”

In determining whether or not the proposed development requires EIA, a local planning authority is required to follow Part II, Section 4 of the EIA Regulations and the relevant schedules. Guidance on ‘*Screening Schedule 2 projects*’ and the EIA process is provided in the PPG at ID: 4-017-20140306. A flowchart of the EIA Screening process is also provided in PPG (ID: 4-030-20140306).

As the Urban Development Projects threshold criteria for site area is exceeded, further consideration against Schedule 3 is necessary to determine whether the proposed development is likely to give rise to significant effects on the environment. Regulation 4(6) requires the local planning authority to take into account ‘...*the selection criteria set out in Schedule 3 as are relevant to the development...*’. These criteria relate to the characteristics of the proposal with regard to its location and the characteristics of any potential significant effects. Schedule 3 lists the characteristics of development as:

- the size of the development;
- the cumulation with other development;
- the use of natural resources;
- the production of waste;
- pollution and nuisances;
- the risk of accidents, having regard in particular to substances or technologies used.

The PPG provides advice on taking into account mitigation measures at the screening stage. Paragraph 023 (ref. 4-023-20140306) states:

“The extent to which mitigation or other measures may be taken into account in reaching a screening opinion depends on the facts of each case. In some cases, the measures may form part of the proposal, be modest in scope or so plainly and easily achievable that it may well be possible to reach a conclusion that there is no likelihood of significant environmental effects. The local planning authority must have regard to the amount of information available, the precautionary principle and the degree of uncertainty in relation to the environmental impact. However, there may be cases where the uncertainties are such that Environmental Impact Assessment is required. Subject to this, proposals for mitigation and other measures may be taken into account by the local planning authority (R(Loader) [2012] EWCA Civ 869).”

The proposal is described below having regard to the environmental sensitivity of the location and the characteristics of any potential significant effects. Possible effects arising from residential development in this location could be regarded to be: the visual impact of the scale, height and massing of the proposals, the impact on local road traffic with associated effects on local air quality and the noise environment; the impact of noise upon new residents having regard to road traffic and the location of the railway line, additional demand on local services such as education, libraries, sports facilities, healthcare, public transport, as well as water supply and the treatment of wastewater.

- 1) Characteristics of development
 - a) *The size of the development;*

This proposal is for up to 540 dwellings proposed within 7 new apartment blocks on an existing employment site of some 2.7 hectares located on the periphery of the town centre. The site comprises a large office complex constructed in 1989 and is considered to be a previously developed site.

The site falls within a transition area within the urban environment and has access directly onto Lytton Way from a vehicular perspective. Nearby footways and cycleways provide good accessibility links to the town centre and railway station and to other parts of the network. It is considered that the use of this site for housing in this highly sustainable location is entirely compatible with emerging policies of the development plan. In this context this site is important in terms of delivery to the local housing market.. Indicative screening thresholds to help determine whether significant effects are likely are provided in the PPG. For urban development projects (Development type 10(b)), the PPG Annex at ID 04-058-20140306 indicates 1,000 dwellings as a guideline threshold above which residential development is more likely to require EIA (for sites which have '*not previously been intensively developed*').

b) the cumulation with other developments

In respect of potential cumulative effects with other development, PPG advises that '*each application (or request for screening opinion) should be considered on its own merits. There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development. There could also be circumstances where two or more applications for development should be considered together*' (ID 4-024-20140306).

We are not aware of other consents that affect this request for screening on the basis that the PPG indicates that only approved developments should be taken into consideration. It is noted that our site is well contained in terms of the railway line on the western edge, Trinity Road to the north, the A602 (Lytton Way) to the east and the A1155 (Fairlands Way) to the south.

c) the use of natural resources;

The impact of the design, construction, and operational management of the scheme in terms of natural resources will be considered as part of a holistic approach to sustainability.

d) the production of waste;

The proposed development will generate waste during the construction phases and that will be recycled and re-used where possible, as a requirement of the Construction Management Plan which we would anticipate being the subject of a suitably worded condition on any relevant planning permission.

e) Pollution and nuisances

Traffic

The proposals constitute the demolition of some 11,300 sqm of office floorspace and the erection of 7 apartment blocks comprising a total of some 540 dwelling units. The proposals do not seek to change the vehicular access arrangements as they enter and leave the site via Lytton Way. Work undertaken by our clients appointed highway consultants suggest that the change of use from office uses to residential uses on the site on the scale envisaged results in very little impact on overall vehicular trip generation for the site. The results do show that there is a change in the direction of trips into and out of the site in the AM and PM peak hours, i.e. more AM departures with the residential use compared to the office use. Therefore, junction capacity assessments are being undertaken of the Lytton Way junctions with Fairlands Way and Trinity Road. These will be set out in a required Transport Assessment to accompany any planning application.

We would confirm that the site is in Stevenage Accessibility Zone 1 with excellent non-car access by train and bus and cycle. It is adjacent to National Cycle Route 12, and a reasonable walk from Stevenage railway and bus stations as well as the town centre. Car parking is therefore at a ratio of about 1 space per 2 dwellings. Regarding the construction of the site, the construction access into the development is proposed via Trinity Road immediately north of the site. This was the means of access for construction of the Icon office building

itself in the late 1980s. It is anticipated that details of construction traffic routes etc would necessarily be included in the need for a demolition and construction management plan as part of a condition

Noise and Vibration

A noise and vibration survey was carried out at the site between the 18th and the 28th April 2016. Noise levels at the site are dictated by road traffic noise emissions from A602, rail traffic on the adjacent railway line and air traffic noise associated with Luton airport.

Acceptable internal noise levels are predicted to be achieved in habitable rooms of the development subject to the adoption of acoustically upgraded glazing and ventilation in the development design. This will be investigated further at the detailed design stage and may be secured by the imposition of a suitable worded noise related planning condition if deemed necessary by the Local Planning Authority.

Noise levels in external amenity areas (in this case balconies) are not in line with the BS8233 recommended levels, however this is not uncommon in urban areas and the predicted noise levels are no greater than the noise levels which are predicted to exist on the balconies of other residential developments in the area.

Ground-borne vibration levels at the site have been measured and fall well below the "*Low probability of adverse comment*" rating for both day- and night-time periods according to BS6472:2008. A copy of the Acoustic Report referred to above is enclosed with this request for screening

Network Rail have provided comments as part of the consultation process undertaken by the Council as part of the pre-application process. They have raised a number of issues including the need to make sure that appropriate measures are in place to safeguard the amenities of new residents within the new development as it relates to noise from the railway.

Air Quality

It is understood that the site is not located within an Area of Air Quality Management. Whilst it is acknowledged that the proposed development will give rise to vehicular movements which will have an impact on pollutants, it is not considered that these would be significant.

f) Risk of Accidents

In terms of the EIA regulations the potential risk of accidents which could impact upon the environment is considered to be extremely low.

2) Location of development

a) The existing land use;

The site comprises a large office building on a central site in Stevenage close to the railway station and on the fringe of the town centre. The boundaries of the site are well defined and comprise the railway line on the western side and roads on the remaining three sides. The building itself comprises significant glass facades stepping in and out along the length of the site and which could be described as being characteristic of the period within which it was constructed. The built form is set behind a substantial mature manicured landscape area providing a strong green edge to the site, particularly on its eastern and southern boundaries. The northern end of the site is given over to surface level car parking where mature trees around the boundary provide a green edge to the development.

b) The relative abundance, quality and regenerative capacity of natural resources in the area;

A Phase 2 ground investigation was undertaken for the proposed residential development on the site in mid 2016 following a Phase 1 desk top study in May 2016. Site works were carried out between July and August

2016 comprising the formation of 15 shallow window sampler boreholes, 3 deep cable percussion boreholes, a single trial pit with soil infiltration test and 3 borehole falling head infiltration tests. The ground conditions of the site were confirmed to comprise of granular and cohesive Glaciofluvial Deposits to form the dominant soil conditions underlying the site with nominal thickness of made ground extending from ground level to a maximum of 3.0m. No groundwater was encountered within any of the other exploratory holes.

The results of environmental testing indicated that, in general, the risk of contamination was low, with some contaminants being considered to be present as hot-spots. However a review of desk study findings with the results of chemical analysis indicate certain contaminant sources to remain a risk to the site due to insufficient exploratory hole coverage of the site, i.e. beneath existing structures and areas of dense services. It is therefore considered that a full assessment of risk would be inappropriate at this stage, and that a post-demolition investigation would be required.

The results of the soil gas monitoring have been compared with the relevant current guidance and indicate the site to fall within a Characteristic Situation 1; very low hazard potential, which requires no significant gas precautions. However, where carbon dioxide concentrations exceed a concentration of 5% the characterisation of the site falls within Characteristic Situation 2 for a type A building, (private ownership, i.e. residential), which may require minimum gas protection measures, i.e. passive ventilated sub floors together with a gas membrane.

As previously mentioned, there are a number of trees that surround each of the development boundaries and which are termed as early mature trees of modest amenity value with younger trees located within the site amongst the buildings, most of low quality and landscape value. Whilst some trees may be lost to facilitate construction, these will be all of low to moderate amenity value and it is considered that the amenity value of these trees can be easily replaced through replanting following construction. The planning application will in any case be accompanied by a tree survey and Arboricultural Impact Assessment. A copy of the Arboricultural Impact Assessment undertaken for the purposes of pre-application is enclosed with this letter.

c) The absorption capacity of the natural environment

The site is rather irregular in shape with a number of site level differences across the site notably at the point of access on a bridge which crosses a former road which lies several metres below. Undercroft parking occurs in a low part of the site. The height differences within the site are not considered to present any significant difficulties in construction terms to deliver the development proposals.

According to the Environment Agency's Indicative Flood Map for land-use planning (Rivers and Sea), the site lies within Flood Zone 1, which is classified as land where flooding from rivers is very unlikely (having a less than 0.1% (1 in 1,000) chance of flooding occurring in any one year). A Flood Risk Assessment and drainage strategy would be submitted, which will identify appropriate mitigation and enhancement measures where required.

The site lies in a zone of transition outside the old town and the new town. The new town remains typically characterised by retail and business uses together with larger commercial areas lying to the west. There are a number of high rise blocks located on the periphery of the new town and which have been the subject of proposals to convert to residential properties. Many of the tall buildings of 6 storeys or more are located south of the A1155 and are located in and around the edge of the town centre. It is notable that the 7 storey block at Woolners Way and the 10 storey block at Kilby Road which are located north and just to the south east of our site provide an important immediate context for the site's development proposals in terms of building height. Those taller buildings around the town centre also provide the wider context for the proposals.

The landscaping proposals for the scheme will be important in softening the impact of development.

A Preliminary Ecological Appraisal was undertaken in May 2016 and recorded all habitats present and made an assessment for the potential presence of protected species. In addition, a desktop study was undertaken to identify any designated sites that may be adversely impacted by any future development of the site and highlight any known records for protected species.

Knebworth Woods SSSI was identified approximately 1,340m south west of the site and separated from the proposal site by many roads and buildings. It is unlikely that the proposed development would cause any adverse impacts to this site due to the distance between the sites and the separation of the sites by major roads and buildings.

A total of eighteen non-statutory designated sites were identified within the 2km search area. The closest site identified was Six Hills Common LWS, approximately 880m south of the site. It is unlikely that the proposed development would cause any direct adverse impacts to these sites due to the distance between the wildlife sites and the proposal site and the separation of the sites by roads and buildings.

The site shows potential to support nesting birds. No other habitat on or immediately adjacent to the site shows potential to support any other protected flora or fauna.

It is recommended that a landscape scheme is designed into the proposals, which should incorporate native and wildlife friendly species and benefit local biodiversity. The inclusion of bird and bat boxes should also be considered as part of any future development, even if this is not required as part of a mitigation scheme. A copy of the Preliminary Ecological Assessment is enclosed with this request for Screening.

The site is not within or adjacent to any ecological designations and the habitats present within the site do not pose an in principle development constraint. An ecological assessment would support any future planning application. There is scope to retain the most significant features within the master planning of the scheme and to incorporate new habitat creation.

3) Characteristics of the potential impact

a) The extent of the impact (geographical area and size of the affected population);

The extent of the impact is local.

There are no sensitive transport receptors in the area. In terms of traffic impact, initial review indicates that the quantum of vehicular trips anticipated can be accommodated on the existing highway network with appropriate mitigation such as a robust Travel Plan to limit the number of vehicular trips as far as possible (a Travel Plan will accompany any planning application). Given the proximity of local facilities and employment opportunities, there is a realistic opportunity for future residents to travel by more sustainable means than the individual use of a private car for local journeys. Consequently, significant effects on the local highway network or associated air quality and noise environment are not anticipated.

b) The transfrontier nature of the impact;

No transfrontier impacts are anticipated.

c) The magnitude and complexity of the impact;

The overall impact of the scheme would not be complex, great, raise any sensitive land use issues, or extend beyond the immediate area within which the site lies.

d) The probability of the impact;

All of the potential impacts are quantifiable.

e) The duration, frequency and reversibility of the impact.

The impacts identified through the construction phase will be temporary. Once the residential development has been completed and is operational, the impact of the development will not be significant in the context of other land uses in the immediate area.

In summary, with the controls that are available to Stevenage Borough Council, we request a Screening Opinion from you as to whether the Council considers that the characteristics of the development proposed in this location are likely to give rise to significant environmental effects, alone, or in accumulation with existing or approved development.

Please do not hesitate to contact me should you require additional information prior to forming the Screening Opinion within the prescribed period.

Yours sincerely

A solid black rectangular box used to redact the signature of Garth Hanlon.

Garth Hanlon BSC Hons MRTPI

cc M Tredgett (Hill Residential Limited)

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Site location plan
Supporting Design Document for Request for Screening Purposes
Acoustic Report May 2016
Arboricultural Impact Assessment 11.5.2016
Preliminary Ecological Appraisal May 2016
Preliminary Landscape Strategy