Chapter 2: EIA Methodology

INTRODUCTION

2.1 This chapter of the Environmental Statement (ES) sets out the overall approach to and methodology for undertaking the Environmental Impact Assessment (EIA). It details the process for identifying the environmental issues (or 'topics') to be included in the EIA and the method of assessing the likely significant effects that have the potential to arise as a result of the Proposed Development, both during the deconstruction and construction works and on completion and occupation.

2.2 The methodology is in accordance with applicable legislation, guidance, and case law and has been tailored to each topic of the EIA using industry standard methods and criteria and professional opinion where appropriate. Further detail on how the assessment methodology is applied to each topic is presented within the respective technical ES chapters of **ES Volume 1** and **ES Volume 2**.

2.3 This ES chapter is accompanied by several appendices which are presented within **ES Volume 3** and referenced as relevant throughout this chapter and the remainder of **ES Volume 1**.

EIA GUIDANCE AND POLICY

EIA Guidance

2.4 The EIA has been prepared in accordance with applicable legislation, guidance, and case law for the preparation of such documents. Specifically, this ES has been undertaken in accordance with the Institute of Environmental Management and Assessment (IEMA) Quality Mark indicator checklist and with due consideration to the following:

- At a European level, reference has been made to the European Commission's (EC) various EIA guidance documents[1];
- At a domestic level, reference has been made to the Ministry of Housing for Communities and Local Government's overarching Planning Practice Guidance[2];
- In addition, Highways England's 'Design Manual for Roads and Bridges Sustainability and Environment – LA104 Environmental Assessment and Monitoring[3]' has been referred to as applicable;
- In relation to publications from professional bodies, reference has been made to IEMA publications as these include best practice/suggested improvements to the EIA process. This includes:
  - IEMA ES Review Criteria (COM3-6)[4];
  - IEMA 'Guidelines for Environmental Impact Assessment' (2016)[5];
  - IEMA 'Special Report into the State of Environmental Impact Assessment Practice in the UK' (2011)[6];
  - IEMA 'Shaping Quality Development' (2015)[7];
  - IEMA 'Delivering Quality Development' (2016)[8];
  - IEMA 'Delivering Proportionate EIA' (2017)[9];
  - IEMA 'Materials and Waste in EIA' (2020)[10];
  - IEMA 'Climate Change Resilience and Adaption' (2020)[11];
  - IEMA 'Major Accidents and Disasters in EIA: A Primer' (2020)[12];
  - IEMA 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (2022)[13];
  - IEMA 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (2022)[14]; and
  - IEMA 'Environmental Assessment of Road Traffic' (2023)[15]
- Applicable EIA case law; and
- Topic specific guidance and assessment criteria, where appropriate.

2.5 Whilst primarily written for major infrastructure projects, reference is also made to guidance/ advice notes published by the Planning Inspectorate in relation to National Infrastructure Planning[16] where appropriate, as these can include relevant/ helpful information.

Planning Policy

2.6 The EIA has considered relevant national, regional, and local planning policy and guidance as summarised below.

National Planning Policy and Guidance

2.7 The EIA has been undertaken having regard to the National Planning Policy Framework[17] (NPPF). The NPPF sets out the Government's economic, environmental, and social planning policies for England. The policies contained within the NPPF articulate the Government's vision of sustainable development, which are intended to be interpreted at a local level, to meet the requirements of local aspirations.

2.8 As relevant to the EIA, specifically to the scope, methodology and assessment of effects for the EIA technical topics, the NPPF has been considered throughout undertaking of the EIA and preparation of the ES.

2.9 The EIA has also referred to the Planning Practice Guidance (PPG)[18], which is an online resource. The PPG aims to make planning guidance more accessible, and to ensure that the guidance is kept up to date.

Strategic Planning Policy and Guidance

2.10 As relevant to the EIA technical topic scope, methodology or assessment of effects, the ES has regard to the following key strategic planning documents:

- The London Plan: The Spatial Development Strategy for Greater London (March 2021)[19] – hereafter referred as 'the London Plan'; and
- Supplementary Planning Guidance (SPG) (i.e. further guidance on policies in the London Plan that cannot be addressed in sufficient detail in the plan itself).

Local Planning Policy and Guidance

2.11 As relevant to the EIA technical topic scope, methodology or assessment of effects, the ES has had regard for the following local planning policy and guidance documents.

Camden Local Plan / Guidance

2.12 The London Borough of Camden's (LBC) Local Plan was formally adopted by the Council in July 2017.

[1] *http://ec.europa.eu/environment/eia/eia-support.htm*
[2] *https://www.gov.uk/guidance/environmental-impact-assessment*
[3] *Highways England, 2020. Design Manual for Roads and Bridges 'Sustainability and Environment' – LA104 Environmental assessment and monitoring*
[4] *Institute of Environmental Management and Assessment, undated; EIA Quality Mark – ES Review Criteria COM 3-6.*
[5] *Institute of Environmental Management and Assessment, 2016, Guidelines for Environmental Impact Assessment.*
[6] *Institute of Environmental Management and Assessment, 2011. The State of Environmental Impact Assessment Practice in the UK.*
[7] *Institute of Environmental Management and Assessment, November 2015. Shaping Quality Development.*
[8] *Institute of Environmental Management and Assessment, 2016; Delivering Quality Development.*
[9] *Institute of Environmental Management and Assessment, 2017; Delivering Proportionate EIA.*
[10] *Institute of Environmental Management and Assessment, 2020; Materials and Waste in EIA.*
[11] *Institute of Environmental Management and Assessment, 2020; Climate Change Resilience and Adaption'*
[12] *IEMA, 2020, Major Accidents and Disasters Guidelines*
[13] *Institute of Environmental Management and Assessment, 2022, Assessing Greenhouse Gas Emissions and Evaluating their Significance'*
[14] *Institute of Environmental Management and Assessment, 2022; Assessing Greenhouse Gas Emissions and Evaluating their Significance*
[15] *Institute of Environmental Management and Assessment, 2023 'Environmental Assessment of Road Traffic'*
[16] *https://infrastructure.planninginspectorate.gov.uk/*
[17] *Ministry of Housing, Communities and Local Government, 2023. National Planning Policy Framework*
[18] *https://www.gov.uk/government/collections/planning-practice-guidance*
[19] *The London Plan, published by the GLA March 2021: https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021*

- **Camden Local Plan (2017)**[20]: The Camden Local Plan (2017) provides a guiding document for development and planning within the Borough until 2031. The current Local Plan outlines the vision for the LBC, comprises policies to support the determination of planning applications and includes consideration of future socio-economic conditions and infrastructure requirements within the Borough.
  - The Camden Local Plan (2017) is undergoing review. To inform the development of the new and updated Camden Local Plan, a call for views was held from 4 November 2022 to 13 January 2023. Consultation on the Regulation 18 Draft Camden Local Plan is proposed to take place later in 2023. At the time of writing, this has yet to be undertaken.
- **Camden Site Allocations Plan (2013)**[21]: Camden Site Allocations sets out the LBCs key objectives and guidance for development of land and buildings on significant sites which are likely to be subject to development proposals during the lifetime of the Core Strategy (2010-2025). These allocations are intended to promote sustainable development and assist in delivering the priorities and objectives of the NPPF, LBCs Local Plan and the London Plan.
  - Following the adoption of the Local Plan in 2017, the Camden Sites Allocations Plan (2013) is undergoing a review. Consultations on the draft Site Allocations Local Plan took place between Thursday 13 February and Friday 27 March 2020. In response to various requests from local residents and community groups, further consultation was undertaken on the 2020 Draft Plan in December 2021 / January 2022. To inform the development of the Site Allocations Local Plan LBC also held a further call for sites from the 4 November 2022 to the 13 January 2023, as part of the engagement on the Local Plan review. Once adopted this Plan will replace policies in the 2013 Site Allocations Plan. It will be used alongside other policies in Camden's Development Plan to assess development proposals on key sites and areas. The draft site allocation document has been reviewed to ascertain whether any site's within the neighboring area to the site should be considered as part of the cumulative effects assessment.
  - **Camden Planning Guidance**[22]: Camden Planning Guidance (CPG) provides advice and information on how Camden will apply its planning policies. LBC has reviewed its CPG documents to support the delivery of the Camden Local Plan, following its adoption in 2017. The adopted CPG documents can be 'material considerations' in planning decisions. **Euston Area Plan (EAP) (2015)**[23]: The EAP creates a planning framework for regeneration of the Euston area that will benefit the local community and London as a whole. Policies propose the creation of new jobs, homes and education and health care facilities and new open spaces. The EAP is currently being reviewed, and a draft EAP for consultation[24] was published in January 2023.

2.13 Any additional local planning policy and guidance documents considered relevant to the technical assessments which are covered by the EIA have also been considered throughout this ES where relevant.

Other Guidance

2.14 In addition to any relevant planning policies that inform the scope, methodology or assessment of effects, as relevant, the technical topic chapters of the ES present a summary of any pertinent recognised industry guidance documents.

EIA SCOPING AND CONSULTATION

Consultation

2.15 Consultation is an ongoing process and has been fed back into the design of the Proposed Development. **ES Volume 1, Chapter 3: Alternatives and Design Evolution** provides a review of the consultation undertaken, as well as the alternative design options considered by the Applicant and the design evolution of the Proposed Development, noting various environmental considerations which the Applicant and Design Team have sought to address.

2.16 Consultation has also fed into and influenced the preparation of the EIA – both in regard to the scope and methodology of this ES as set out in the '*EIA Scoping*' section below. Where appropriate, separate topic-specific consultation has also been undertaken with relevant parties and is summarised in the introductory sections of **ES Volume 1, Chapter 6 to 12** and **ES Volume 2**.

2.17 The planning application is supported by a Planning Statement and Statement of Community Involvement, which summarises the wider consultation that has been undertaken with various consultees and stakeholders throughout the pre-application consultation process.

EIA Scoping

2.18 Scoping typically forms one of the first stages of the EIA process. It is through EIA scoping that the Local Planning Authority (LPA) (in this case, the LBC) and other key statutory and non-statutory consultees are consulted on environmental topics that should be included in the scope of the EIA.

2.19 The process of EIA scoping and consultation is important to the development of a comprehensive and balanced ES. Views of consultees have helped to identify specific issues that require further investigation as part of the EIA process.

2.20 The main purpose of the EIA scoping process is to establish the approach to the EIA. This includes:

- Identification of the availability of existing baseline data and appropriate baseline surveys to be undertaken;
- Identification of sensitive receptors;
- Identification of potential environmental considerations and potential environmental effects;
- Identification of the topics to be included within the scope of the EIA and the methodology for assessment, based on the potential for significant effects as a result of the Proposed Development and deconstruction and construction works;
- Identification of any topics that can be scoped out of the EIA, with justification provided as to why likely significant environmental effects are not anticipated;
- Definition of the methodology for the assessment of the likely significant environmental effects; and
- Identification of other development schemes (hereafter referred to as 'cumulative schemes') to be considered within a cumulative effects assessment.

2.21 An EIA Scoping Opinion Request Report (hereinafter referred to as the 'EIA Scoping Report') was formally submitted by Trium on behalf of the Applicant to the LBC on the 4 August 2023, to request an EIA Scoping Opinion from LBC and statutory consultees pursuant to Regulation 15[25] of the EIA Regulations. The EIA Scoping Report outlined the proposal for redevelopment, the proposed scope of the ES and of the likely significant environmental effects to be considered, topics where significant effects were not considered to be likely (and as such 'scoped out' of the ES), the methodology for assessment, and a list of cumulative schemes.

2.22 The EIA Scoping Report underwent review by the LBC's EIA advisors, CBRE. A pre-application meeting was held with CBRE on the 6 September 2023 which focused on the EIA Scoping Report and scope of the ES. Following this, a draft of the 'EIA Scoping Report Review' was issued to Trium on 4 October 2023, and a final EIA Scoping Opinion was subsequently issued on the 16 November 2023. The EIA Scoping Report submitted to LBC and the EIA Scoping Opinion received are presented in **ES Volume 3, Appendix: EIA Methodology – Annex 1** and **ES Volume 3, Appendix: EIA Methodology – Annex 2**, respectively.

2.23 The EIA Scoping Opinion broadly confirmed acceptance of the proposed scope of the ES, and agreed the scope was generally adequate. Comments made as part of the EIA Scoping Opinion have been considered throughout the EIA process and the preparation of the ES. Where relevant, key points for

[20] *London Borough of Camden Local Plan, 2017: https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf*
21 https://www.camden.gov.uk/documents/20142/4820180/Site+Allocations+Plan+2013.pdf/fee9b22c-ac6f-900f-6d78-28f42d4bf084
22 https://www.camden.gov.uk/camden-planning-guidance
[23] *Euston Area Plan: A New Plan for the Euston Area (2015).*
[24] *Draft EAP Update for Consultation: January 2023.*
[25] *His Majesty's Stationery Office (HMSO) 2017. The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (as amended).*

consideration as outlined within the EIA Scoping Opinion have been signposted within the introductory table of each respective technical ES chapter. A summary of the key scoping consultation undertaken, and the subsequent outcomes, are also presented within the introductory table of each technical ES chapter of **ES Volume 1 (Chapters 6 – 12)**, where relevant.

'Scoped-In' Topics

2.24 The environmental issues where the potential for likely significant effects was identified during the EIA Scoping process and that have been assessed within this EIA are listed below:

- Deconstruction and Construction (**ES Volume 1, Chapter 5**);
- Socio-Economics (**ES Volume 1, Chapter 6**);
- Traffic and Transport **(ES Volume 1, Chapter 7**);
- Air Quality (**ES Volume 1, Chapter 8**);
- Noise and Vibration (**ES Volume 1, Chapter 9**);
- Daylight, Sunlight, Overshadowing and Solar Glare (**ES Volume 1, Chapter 10**);
- Wind Microclimate (**ES Volume 1, Chapter 11**);
- Climate Change and Greenhouse Gases (**ES Volume 1, Chapter 12**); and
- Townscape, Visual and Built Heritage Assessment (**ES Volume 2**).

'Scoped-Out' Topics

2.25 The EIA Scoping process also identified the environmental topic areas which are not likely to give rise to significant environmental effects and therefore were not assessed further as part of the EIA process. The EIA Scoping Report is provided at **ES Volume 3, Appendix: EIA Methodology – Annex 1** and includes the justification for why significant effects in relation to these topics is not likely and why they are therefore 'scoped out' of the ES. The scope of the ES and topics which are scoped out were agreed with the LBC and forms part of their Scoping Opinion (**Annex 2**) The 'scoped out' topics include:

- Archaeology;
- Ecology and Biodiversity;
- Geoenvironmental (Ground Conditions, Groundwater, Land Take and Soils)[26];
- Health;
- Light Spill;
- Project Vulnerability, Major Accidents and Natural Hazards;
- Waste and Materials; and
- Water Resources, Flood Risk and Drainage.

2.26 Any necessary mitigation measures relating to these topics detailed within the EIA Scoping Report are included in **ES Volume 1, Chapter 15: Environmental Management, Mitigation and Monitoring Schedule,** for completeness.

ENVIRONMENTAL IMPACT ASSESSMENT METHODOLOGY

General EIA Methodology

2.27 The method behind the EIA process generally considers the existing conditions of the area into which the development is being introduced (**the baseline**), providing a future baseline context for assessments where relevant, and makes reasonable predictions of the likely change (**the impact – in terms of magnitude**) that may occur, during both its deconstruction and construction and when the development is completed and operating as proposed. The predicted impact is considered in terms of key environmental and social aspects (**receptors**) found within the surrounding area, and based on their sensitivity to change, the scale of the resulting change experienced by the receptor/ resource (**the effect**) is then determined along with a statement on whether the effect is significant or not.

2.28 Any mitigation measures required to reduce or eliminate adverse effects are then considered and assessed, with the resulting residual effect scale being determined as significant or not.

2.29 Effects resulting from a combination of the Proposed Development and other surrounding schemes (**cumulative schemes**) are also assessed. All the likely effects of the Proposed Development are reported (**within the ES**) and the likely significant effects are specifically highlighted.

Baseline Conditions

2.30 The purpose of the EIA is to predict how environmental conditions may change as a result of the Proposed Development. The assessment of the nature and scale of a predicted change is undertaken against a reference condition, known as the baseline. In most cases, the baseline represents the environmental condition of the site and the surrounding area at the time of assessment.

2.31 Baseline assessments utilise any existing and available information, as well as new information either collected through baseline surveys undertaken during the course of the EIA process or additional information provided as part of the EIA Scoping and consultation process. This information has been used to present an up to date description of the baseline conditions of the site and surrounding area within the ES for each of the individual technical ES chapters (**ES Volume 1, Chapters 6 to 12** and **ES Volume 2**).

2.32 For most technical disciplines, the baseline has been taken as the existing conditions within the site and the surrounding area, at the time of assessment (i.e. in the assessment year of 2023), although in defining the baseline conditions, data from preceding years may be used where the data remains relevant (e.g. with regards to air quality).

2.33 Cumulative schemes are set out in the *'Cumulative Effects and Effect Interactions'* section of this ES chapter and are shown in Figure 2.1. In some instances, where schemes are under construction and the works are sufficiently progressed or where early phases are occupied, these schemes have been factored into the baseline conditions (as a future baseline). The approach taken for each assessment is set out in the respective technical ES chapters in **ES Volume 1, Chapters: 6 to 12**.

Future Baseline

2.34 The Traffic and Transport, Air Quality and Noise and Vibration assessments include a projected future environmental condition (specifically in relation to future road traffic flows to account for any background growth in road traffic between the baseline and the future opening year of the Proposed Development). The anticipated opening year (and so future baseline year) for the Proposed Development is 2030 (**ES Volume 1, Chapter 5: Deconstruction and Construction**). Further details on the methodology for defining the future baseline conditions in respect of road traffic are provided within **ES Volume 1, Chapter 7: Traffic and Transport, ES Volume 1, Chapter 8: Air Quality** and **ES Volume 1, Chapter 9: Noise and Vibration.**

Evolution of the Baseline

2.35 In accordance with the requirements of the EIA Regulations, consideration is given as to how the existing baseline conditions may evolve in the future, in the absence of the Proposed Development. The EIA Regulations state that (Schedule 4(3)):

"A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge".

[26] ***ES Volume 3, Appendix: EIA Methodology – Annex 1 (Ground Conditions Topic Sheet)*** *identified that a Preliminary Risk Assessment would be prepared as a standalone planning deliverable. Following subsequent conversations with the Council, it was agreed that this was not required as the relevant information in relation to ground conditions is covered in the Basement Impact Assessment.*

2.36 This requirement is presented within each of the individual technical ES chapters under the heading *'Evolution of the Baseline'*. The evolved baseline is a baseline condition at an indeterminate point in the future, for a scenario which assumes all of the cumulative schemes are built in the surrounding environment and that the surrounding environment, including the site, has naturally evolved in the absence of the Proposed Development being implemented. In most cases a qualitative approach is taken (professional opinion), but in some instances this may be quantitative.

Potentially Sensitive Receptors

2.37 When undertaking an EIA, it is important to identify key potential receptors from the surrounding baseline context which may be impacted by the Proposed Development and may need to be considered as part of the assessment. The EIA process has included the identification and assessment of impacts to and effects on potentially sensitive receptors resulting from deconstruction and construction activities and from the completed and operational Proposed Development.

2.38 Within each of the technical ES chapters (**ES Volume 1, Chapters 6 to 12** and **ES Volume 2**), a list of sensitive receptors is presented which are considered to have the potential to be affected by the Proposed Development.

2.39 The receptors addressed within the technical ES chapters have been identified from a review of the available information collected as part of the description of the surrounding environmental context for each technical assessment, from historic and currently available information relating to the site itself and through EIA Scoping Consultation. Potentially sensitive receptors have also been identified from a review of the description of the Proposed Development (**ES Volume 1, Chapter 4: The Proposed Development**) sought for approval and the potential impacts and resultant effects which may occur as a result of newly introduced receptors of the Proposed Development.

Identification of Impacts, Effects and Effect Significance

Terminology and Definitions

Reference to 'Impact' and 'Effect'

2.40 It is noted that the terms 'impact' and 'effect' are distinctly different. Having gained an understanding of the likely impact it is then important to know whether the change in environmental conditions results in a significant environmental effect. The impacts of the Proposed Development may or may not result in significant effects on the environment, depending on the sensitivity of the receptor and possible other factors (such as duration). The assessment of the likely significant effects of the development is a requirement identified by Schedule 4 of the EIA Regulations.

Receptor Sensitivity and Magnitude of Impact

2.41 To achieve a consistent approach across the different technical disciplines addressed within the ES **(ES Volume 1)**, assessments have broadly defined the sensitivity of the receptors that could be affected by the Proposed Development and the magnitude of impact or change from the baseline conditions in order to derive the resultant effect. Technical specialists have used their own approach or amended the approach stated below based on what is appropriate for their assessments.

2.42 Terminology to describe the sensitivity of receptors and magnitude of impact or change from the baseline conditions is broadly as follows:

- High;
- Medium;
- Low; or
- Negligible.

2.43 Where there is no impact/change, no assessment is required due to there being no potential for significant effects.

2.44 Each of the technical assessment chapters of the ES **(ES Volume 1)** have provided further detail on the definition of each of the above terms specific to the topic in question and also provide the criteria, including sources and justifications, for quantifying the different levels of receptor sensitivity and 'impact magnitude'. Where possible, this has been based upon quantitative and accepted criteria (for example, national standards for air quality and noise), together with the use of value judgement and expert interpretation.

Likely Effects

Identification of a Resultant Effect

2.45 The basis for determining the resultant effect generally takes into account the sensitivity of the receptor and magnitude of impact or change from the baseline conditions. A generic matrix that combines the sensitivity of the receptor and the magnitude of impact to identify the resultant effect is provided within Table 2.1 (although where this differs for a technical ES topic, this has been clearly stated in the topic's methodology).

Table 2.1 Resultant Effects

Receptor Sensitivity	Magnitude of Impact			
	High	Medium	Low	Negligible
High	Major	Major	Moderate	Minor
Medium	Major	Moderate	Minor	Negligible
Low	Moderate	Minor	Negligible	Negligible
Negligible	Minor	Negligible	Negligible	Negligible

Identification of Scale of Effect

2.46 The categories and definitions of the 'scale' of the resultant effect (i.e. definitions of Major, Moderate, Minor and Negligible effects) have been adjusted to suit the technical topic in question; where this is the case, revised definitions of effect scale are presented in the technical assessment chapters of **ES Volume 1** and in **ES Volume 2**.

2.47 Where there is no impact to a receptor and therefore no effect, this has been stated.

Effect Nature

2.48 Table 2.2 provides definitions of the 'nature' of the resultant effect i.e. definitions of Adverse and Beneficial.

Table 2.2 Definition of the Nature of the Resultant Effect

Type of Effect	Description
Adverse	Detrimental or negative effects to an environmental resource or receptor. The quality of the environment is diminished or harmed.
Beneficial	Advantageous or positive effect to an environmental resource or receptor. The quality of the environment is enhanced.

2.49 In addition to Table 2.2, **ES Volume 2** has used the term 'neutral' when describing the nature of effects. The definition of a 'neutral' effect is: '*on balance, the effect is considered neither beneficial nor adverse overall, having made a 'net equation' judgment that takes into account both beneficial and adverse impacts*'.

Geographic Extent of Effect

2.50 The ES **(Volumes 1 and 2)** has identified the geographic extent of the identified effects. At a spatial level, 'site' or 'local' effects are those affecting the site and neighbouring receptors, while effects upon receptors in LBC beyond the vicinity of the site and its neighbours are considered to be at a 'district/ borough' level. Effects affecting Greater London are considered to be at a 'regional' level, whilst those

which affect different parts of the country, or England as a whole, are considered being at a 'national' level.

Effect Duration

2.51 For the purposes of the ES, effects that are generated as a result of the deconstruction and construction works (i.e. those that last for this set period of time) are classed as 'temporary'; these may be further classified as either 'short term' or 'medium-term' effects depending on the duration of the deconstruction and construction works that generate the effect in question. Effects that result from the completed and operational phases of the Proposed Development are classed as 'permanent' or 'long-term' effects.

Direct and Indirect Effects

2.52 The ES identifies whether the effect is 'direct' (i.e. resulting without any intervening factors) or 'indirect' or 'secondary' (i.e. not directly caused or resulting from something else).

Significance of Effect

2.53 Following identification of an effect and the implementation of mitigation measures, the residual effect's scale, nature, geographic extent, and duration and whether the effects are direct or indirect, using the above summarised terminology, has been summarised in a clear statement within **ES Volume 1** and **ES Volume 2** and used to ascertain whether the residual effect is significant or not significant. Each technical assessment determines at what scale an effect is deemed to be significant, as this varies depending on the topic.

2.54 As a general rule, the following applies (although where this differs for a technical topic, this has been clearly stated in the topic's methodology):

- 'Moderate' or 'Major' effects are deemed to be '**Significant**';
- 'Minor' effects are considered to be 'not significant', although they may be a matter of local concern; and
- 'Negligible' effects are considered to be 'not significant' and not a matter of local concern.

2.55 Where mitigation measures are identified to either eliminate or reduce likely adverse effects, these have been incorporated into the ES, for example either through the design, or translated into deconstruction and construction commitments; or operational or managerial standards/ procedures. It should be noted that mitigation is not required for effects that are deemed to be Negligible.

2.56 The ES then highlights the 'residual' effects (those effects which remain following the implementation of suitable mitigation measures) and classifies these in accordance with the terminology defined above.

Impact Assessment – General Methodology

2.57 Detailed methodologies for the assessment of each of the environmental topic areas scoped into the EIA are provided within each technical ES chapter of **ES Volume 1** and in **ES Volume 2**, however, in general terms, the assessments have been based upon (as appropriate):

- Desk-top studies;
- Site surveys;
- Consideration of relevant legislation;
- Consideration of relevant planning policies (national, regional and local);
- Consideration of potentially sensitive receptors that could be affected by the Proposed Development;
- Identification of likely environmental impacts, with an evaluation of their likely magnitude, and resultant effects in terms of their nature, scale, geographic extent, duration and whether they are direct or indirect or transboundary;
- Consideration of the requirement for any specific mitigation;
- Expert opinion;
- The use of technical guidance and best practice; and
- Specific consultations with appropriate organisations.

2.58 Mitigation is the term used to refer to the process of avoiding where possible and, if not, minimising, controlling and/or off-setting potentially significant adverse effects of a development. Mitigation measures can relate to the design stage; the deconstruction and construction stage; or the activities associated with the operation of the completed Proposed Development.

2.59 As part of the EIA, an iterative approach has been adopted where significant environmental effects have been avoided where possible in the first instance through design refinements and iterations, as reported upon within **ES Volume 1, Chapter 3: Alternatives and Design Evolution.** Where adverse environmental effects were identified through early assessment work, opportunities to reduce or control impacts and effects have been identified and incorporated into the Proposed Development. In addition, opportunities to enhance the beneficial environmental effects of the Proposed Development have also been sought and incorporated into the Proposed Development.

2.60 Within each technical chapter of this ES, the assessment of the potential effects that are likely to arise because of a potential impact/ change to receptors from the Proposed Development is initially presented. If any mitigation measures are required, further to that already integrated into the Proposed Development ('embedded mitigation') throughout its evolution, these are incorporated, and the Proposed Development is reassessed to ascertain the likely residual effects and any which are significant. This is reported on within each technical chapter of this ES **(ES Volume 1** and **Volume 2)**.

2.61 How the Proposed Development might affect the environment relies on predictions about what impact a certain action will have. Some predictions can be made using mathematical or simulation models. Other impacts are less easy to predict in quantitative terms. In such cases, the EIA attempts to quantify the anticipated scale of impact using professional judgement.

Assessment Scenarios

2.62 Each of the technical assessments have considered the following scenarios, as relevant:

- The deconstruction and construction works of the Proposed Development;
- The completed and operational Proposed Development; and
- Cumulative assessment – the Proposed Development with other surrounding development schemes, often referred to as 'cumulative schemes'.

Deconstruction and Construction

2.63 **ES Volume 1, Chapter 5: Deconstruction and Construction** provides an outline of the anticipated deconstruction and construction programme, and related activities and aspects (i.e. deconstruction and enabling works, substructure works, superstructure works etc., deconstruction waste volumes and construction material quantities, HGV movements and HGV routing). In addition, the standard environmental controls required under legislation and best practice guidance (including relevant codes of construction practice) are presented.

2.64 The peak periods of daily HGV movements, and annual averages, associated with the deconstruction and construction works have also been undertaken. This information informs the deconstruction and construction impact assessments of each technical ES chapter. Throughout the deconstruction and construction impact assessments, the assumption has been made that the standard environmental controls required under legislation and best practice guidance are met as a matter of course.

2.65 The assessment of the potential likely significant effects arising during the deconstruction and construction works is addressed within each of the individual technical ES chapters. The deconstruction and construction assessments presented within the technical ES chapters identify the need for any additional or bespoke environmental management or mitigation measures in order to avoid, prevent, reduce or off-set any significant adverse effects identified.

2.66 Where relevant and required, a description of any proposed monitoring arrangements is also presented and defines (where appropriate) the procedures regarding the monitoring of the relevant significant adverse effects, the types of parameters to be monitored and the monitoring duration.

2.67 All the measures proposed within the technical ES chapters have been compiled and presented in a mitigation and monitoring schedule (for ease of reference, this is located in **ES Volume, Chapter 15: Environmental Management, Mitigation and Monitoring Schedule**).

2.68 It is anticipated that any required deconstruction and construction related environmental management/ mitigation and monitoring measures would be secured and controlled through an appropriate Construction Management Plan (CMP), and it is proposed that the requirement for this be secured by a suitably worded planning condition attached to the consent of the planning application. Key mitigation and management controls that would form part of a CMP are presented in the relevant ES chapters and **ES Volume 1, Chapter 15: Environmental Management, Mitigation and Monitoring Schedule**.

Completed and Operational Development

2.69 This ES presents a description of the Proposed Development in order to provide suitable context to enable the assessment of the potential and likely significant environmental effects. Sufficient information regarding the key aspects of the Proposed Development (as listed below) is presented in **ES Volume 1, Chapter 4: The Proposed Development** to allow understanding of the Proposed Development, in order to enable the assessment of potential and likely significant environment effects of the completed and operational development.

2.70 Information on the details of the Proposed Development sought for approval include (but are not limited to):

- Layout – building footprint;
- Scale – the massing (including the height of the building);
- Quantum – floor areas and use classes;
- Appearance – architectural detail and materiality;
- Access and egress – vehicular, pedestrian and cyclist accessibility into, out of and around the site;
- Deliveries and servicing strategy – including overview of estimates of the types and quantities of waste anticipated and strategy for waste storage, handling and collection;
- Proposed energy strategy; and
- Landscaping.

Lab-Enabled Floorspace

2.71 The Proposed Development will provide up to 74,791m^2 Gross Internal Area (GIA) / 80,630m^2 Gross External Area (GEA) of Use Class E(g) floorspace, which will comprise the following uses:

- Use Class E(g)(i) – an office to carry out operational or administrative functions; and / or
- Use Class E(g)(ii) – the research and development of products or processes.

2.72 Of the above total Use Class E(g) floor area, the Proposed Development will provide up to 19,939m^2 GIA / 24, 380m^2 GEA of lab-enabled workspace (Use Class E(g)(ii)).

2.73 Therefore, the following two land use options have been considered, where relevant, throughout the ES:

- A maximum life science (19,939m^2 (GIA) / 24,380m^2 (GEA)) and office (46,465m^2 (GIA) / 56,250m^2 GEA); and
- Maximum office (80,630m^2 GEA).

2.74 Detail on the reasonable worst-case scenarios assessed in relation to these uses is set out in the *'Impact Assessment Methodology'* sections of the respective technical chapters of **ES Volume 1, Chapters 6 to 12** and **ES Volume 2:**

Cumulative Effects and Effect Interactions

2.75 The EIA Regulations require that, in assessing the effects of a particular development proposal, consideration should also be given to the likely significant effects arising from the *"cumulation with other existing and/ or approved projects"* (Schedule 4, 5I).

2.76 Cumulative effects can occur as interactions between the effects associated with a number of projects in an area which may, on an individual basis be insignificant, but together (i.e. cumulatively), result in a significant effect. Cumulative effects arising from the Proposed Development in combination with other development schemes ('cumulative schemes') has been considered through the ES. The potential for cumulative effects arising during the construction works and once the Proposed Development is complete and operational is considered.

2.77 Each individual technical ES chapter presents an assessment of cumulative effects on the Proposed Development coming forward in isolation alongside other surrounding cumulative schemes as agreed with the LBC.

2.78 The EIA identifies the potential for the following, which is described below:

- Inter Cumulative Effects – Cumulative Effects with Other Developments; and
- Intra Cumulative Effects – Effect Interactions of the Proposed Development.

Inter Cumulative Effects – Cumulative Effects with Other Developments

2.79 Cumulative effects arising from the Proposed Development in combination with other surrounding development schemes or 'cumulative schemes' during the deconstruction and construction works and also once the Proposed Development is complete are considered by the EIA. The EIA Regulations require an assessment of potentially significant cumulative effects of the Proposed Development along with other developments. There are no legislative or policy requirements which set out how a cumulative impact assessment should be undertaken.

2.80 The cumulative schemes that are considered within the ES are typically located within a 1km radius from the boundary of the site as this spatial extent is considered appropriate for determining cumulative effects in this locality based on experience and professional judgement. This catchment area has been set to provide a reasonable study area for the assessment of cumulative effects.

2.81 It is acknowledged that for certain topics of the EIA (specially Townscape, Visual and Built Heritage), there is a need to consider more distant schemes within the cumulative effects assessment. This is appropriate, given the view locations associated with the townscape and visual impact assessment.

2.82 The criteria for the cumulative schemes included within the cumulative effects assessment include the following:

- Development within an indicative 1k radius of the site that is:
  - subject to a planning application and is yet to be determined;
  - has a resolution to grant planning permission; or
  - has full planning consent,
- comprising either:
  - An uplift of more than 10,000 square meters GEA of mixed-use floorspace or, provide over 150 residential units; or
  - Office to residential conversions (granted under the General Permitted Development Order) giving rise to over 150 residential units; or
  - Any development / change of use adjacent to the site.

2.83 The criteria listed above has been set to allow schemes coming forward within the LBC (and adjacent boroughs of Islington and City of Westminster) to be subject to an initial screening exercise to determine the schemes that, based on the scale of redevelopment (amount and mix of uses), could potentially have a cumulative effect with the Proposed Development and should be considered further within the cumulative effects assessment of the EIA. In some instances the radius is extended to include other schemes identified by LBC as appropriate.

2.84 By applying these criteria to all the schemes coming forward, the cumulative effects assessment of the EIA becomes more focused on the schemes which, based on the scale of redevelopment (amount and mix of uses) and location relevant to the site, have more potential to interact in a cumulative manner. Each technical ES chapter is clear on the cumulative schemes that have been considered within the cumulative effects assessment of the topic in question, including a reasoning behind their inclusion. Where cumulative schemes have been 'screened out' of the cumulative effects assessment, the reasoning for doing so is presented in the relevant ES chapter.

2.85 Schemes which fall within the above criteria and are under construction, where the construction works are significantly progressed or where early phases are occupied, will be factored into the baseline conditions (as a future baseline). If relevant, this will be clearly set out within each individual topic's cumulative assessment methodology text.

2.86 The following 7 cumulative schemes are considered within the EIA:

- London Borough of Camden;

1. Land to the North of the British Library (2022/1041/P);
2. Central Somers Town (2015/2704/P);
3. Eastman Dental Hospital (2018/5715/P);
4. Royal National Throat, Nose and Ear Hospital (2020/5593/P
5. 247 Tottenham Court Road (2020/3583/P);
6. Network Building (2020/5624/P); and
7. Belgrove House (2020/3881/P).

2.87 High Speed Rail Phase 1[27] is a rail connection from London to the Midlands that is currently under construction, with an anticipated completion year of 2029-2033. Phase 1 will connect London to Birmingham with its London terminal located at Old Oak Common. The proposed link to Euston Station, which lies approximately 500m east of the site, is due to open between 2031 and 2035. The cumulative effect of the Proposed Development and HS2 has been considered, where relevant, within each of the technical ES chapters (**ES Volume 1, Chapters 6 to 12**).

2.88 The locations of the above identified cumulative schemes in relation to the Proposed Development are presented in Figure 2.1 and presented in **ES Volume, Appendix: EIA Methodology – Annex 3**. The consideration of 'Inter Cumulative Effects' is provided in each of the technical ES chapters (**ES Volume 1, Chapters 6 to 12** and **ES Volume 2**).

Intra Cumulative Effects

2.89 Intra-project cumulative effects from the Proposed Development itself on surrounding sensitive receptors during the deconstruction and construction works and once the Proposed Development is completed are considered within **ES Volume 1, Chapter 13: Effect Interactions**. Effect interactions occur as interactions between the effects of different topics associated with just one project, i.e. the combination of individual effects arising as a result of the Proposed Development, for example effects in relation to noise, airborne dust or traffic on a single receptor.

2.90 Effect interactions from the Proposed Development itself on particular receptors at the site and surrounds has been considered during the deconstruction and construction works and also once the Proposed Development is completed and operational. Dependent on the relevant sensitive receptors, the assessment focuses either on key individual receptors or on groups considered to be most sensitive to potential effect interactions. The potential interaction of residual effects that are of Minor, Moderate or Major scale (see *'Identification of Impacts, Effects and Effect Significance'* above for further details) are considered within this assessment. Residual effects which are 'Negligible' are excluded from this assessment as by virtue of their definition are considered to be imperceptible, therefore the combination of any imperceptible effects with other effects should not result in any increased level of effect.

2.91 There is no established methodology for assessing the impact of cumulative effects on a particular receptor. Therefore, a scale of effect will not be applied to the combination of individual effects (such as Minor, Moderate or Major). However, the European Commission has produced guidelines to assist EIA practitioners in developing an approach which is appropriate to a project. These guidelines[28] have been used to develop an approach which uses the defined residual effects of the Proposed Development (as presented within the technical ES chapters) to determine the potential for effect interactions. Therefore, relevant effect interactions are discussed, and professional judgement has been applied to determine whether the effect interaction is considered 'significant'[29].

2.92 Consideration of effect interactions is presented within the ES in a separate ES chapter titled 'Effect Interactions' (**ES Volume 1, Chapter 13: Effect Interactions**).

[27] *His Majesty's Stationery Office (HMSO) 2017. High Speed Rail (London – West Midlands) Act 2017.*
[28] *European Community (1999); Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions.*
[29] *The methodology for determining a significant in-combination effect has been defined by the HS2 Phase 2a: West Midlands – Crewe Scoping and Methodology Report (July 2017) and the published HS2 Phase 2a Environmental Statement Volume 1 Introduction and Methodology and Volume 2 Community Area Reports (July 2017). The methodology for assigning significance to in combination effects has been specifically included in this ES to assess if there are any combination effects would result in a significant effect.*

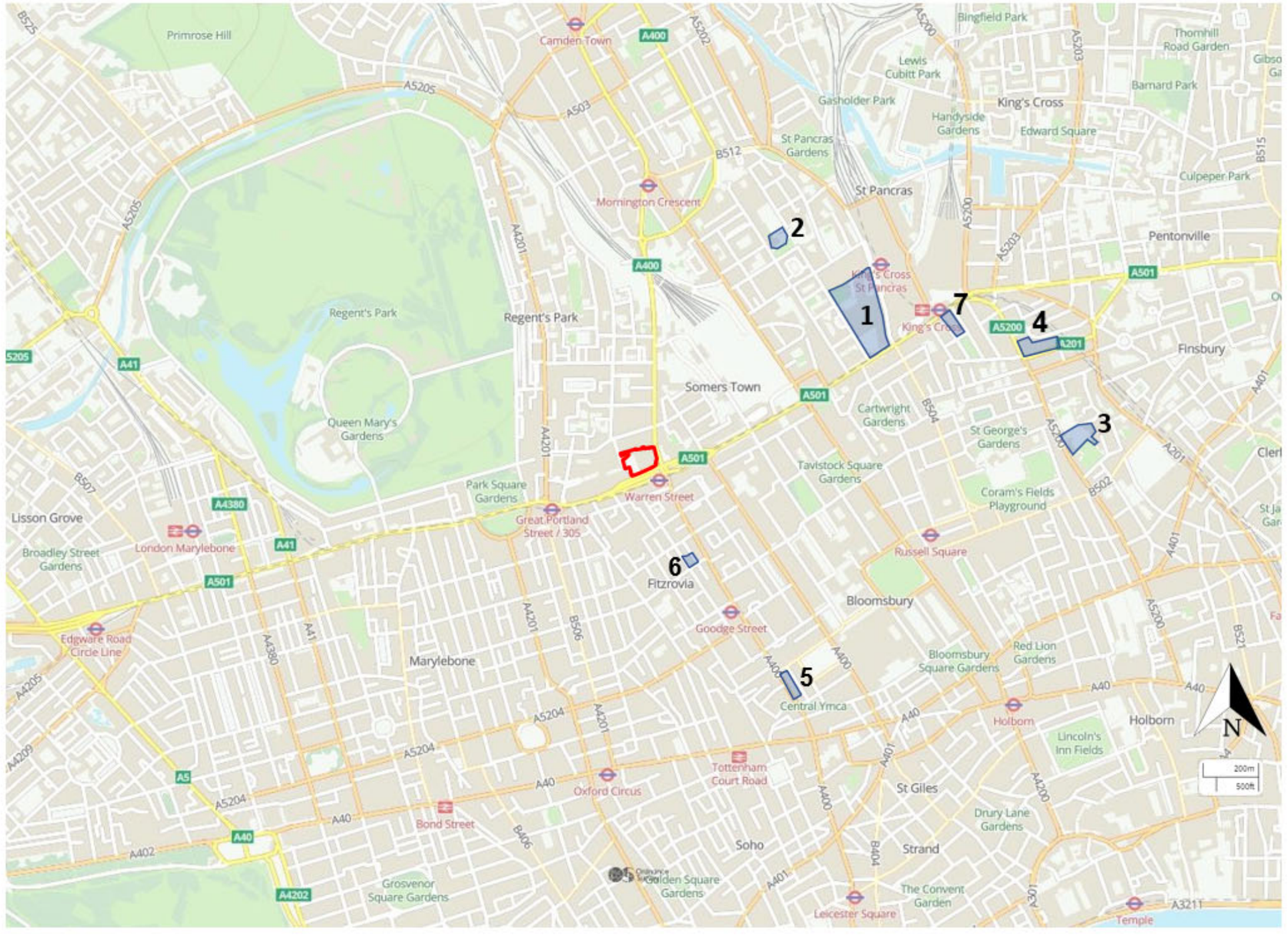
Figure 2.1 **Cumulative Schemes Map**

Euston Tower Cumulative Schemes

London Borough of Camden

1. Land to the North of the British Library
2. Central Somers Town
3. Eastman Dental Hospital
4. Royal National Throat, Nose And Ear Hospital
5. 247 Tottenham Court Road
6. Network Building
7. Belgrove House

Key:
- The Site
- Cumulative Schemes



STRUCTURE OF TECHNICAL ASSESSMENTS

2.94 This ES reports on the potential (before mitigation) and residual (after mitigation) environmental effects of the Proposed Development during deconstruction and construction works and on subsequent completion and operation. The ES also concludes with a summary of the likely significant beneficial, neutral and adverse environmental effects of the Proposed Development (**ES Volume 1, Chapter 14: Likely Significant Effects**).

2.95 Each of the technical environmental topics considered in the EIA have been assigned a separate ES chapter in **ES Volume 1**. Within each of the technical ES chapters, the assessment is presented and reported in the following format:

- An Introductory Table – setting out the author of the technical topic assessment, identification of relevant appendices, key topic related considerations and the consultation undertaken;
- Assessment Methodology – an explanation of the approach to defining the baseline conditions, assessment scenarios, evolved and cumulative baseline conditions, undertaking the impact assessment (deconstruction and construction and operation, and any key assumptions made including inherent mitigation) and the definitions of the nature and scale of effect and what effects are deemed to be significant;
- Baseline Conditions – a description of the baseline conditions of the site and surrounding area (as relevant to the technical topic in question);
- Receptors and Receptor Sensitivity – identification of the existing and introduced (new) receptors on the site and in the surrounding area that may be affected by the Proposed Development and identification of their sensitivity;
- Potential Effects – an assessment of the likely significant effects of the Proposed Development during deconstruction and construction and on completion, setting out the impacts and effects associated with each aspect of the assessment and an evaluation of their significance against defined criteria without the implementation of mitigation;
- Mitigation Measures, Monitoring and Residual Effects – a description of the mitigation measures that are being committed to and a summary of the residual effects of the Proposed Development. Any monitoring that is required is also stated;
- Assessment of Future Environment – a description of the likely evolution of the baseline (as relevant) and an assessment of the likely significant effects of the Proposed Development in relation to any 'in combination' effects with cumulative schemes; and
- Likely Significant Effects – a short statement confirming which residual effects are considered to be significant.

TVBHA Structure

2.96 **ES Volume 2**, comprised of the Townscape, Visual and Built Heritage Assessment, is structured as follows:

- Introduction – setting out the purpose of the volume;
- Planning Policy Context – relevant heritage, townscape and visual legislation and planning policy;
- Assessment Methodology – an explanation of the assessment framework, in accordance with guidance relevant to heritage, townscape and visual;
- Baseline Conditions – assessment of the current site conditions;
- Visual Characteristics of the Proposed Development – a description of the design of the Proposed Development;
- Assessment of Effects – an assessment of the heritage, townscape and visual receptors, and assessment of likely significant effects of the Proposed Development;
- Conclusions – the remaining effects following the inclusion of outlined mitigation measures; and
- References.

ASSUMPTIONS AND LIMITATIONS

2.97 The principal assumptions that have been made, and any limitations that have been identified, in undertaking the EIA are set out below. Assumptions specifically relevant to each technical topic have been set out in each technical chapter of the ES.

- Baseline conditions have been established from a variety of sources, including historical data and site visits, and are accurate at the time of writing;
- It is assumed that information received from third parties is accurate, complete and up to date;
- The assessments contained within each of the **ES Volume 1** technical ES chapters and in **ES Volume 2** are based on an assumption that the application drawings and description of development, regulatory regimes and management controls as set out in **ES Volume 1, Chapter 4: Proposed Development**; **ES Volume 1, Chapter 5: Deconstruction and Construction;** and **ES Volume 1, Chapter 15: Environmental Management, Mitigation and Monitoring Schedule**, are implemented;
- Deconstruction and construction works across the site would take place substantially in accordance with the programme of works described in **ES Volume 1, Chapter 5: Deconstruction and Construction** and measures agreed through the outline CMP*;*
- Where detailed information has not been available, reasonable assumptions have been made, and have been clearly set out, based on experience of developments of a similar type and scale to enable assessment of likely significant effects; and
- Consented or reasonably foreseeable cumulative schemes will be implemented substantially in accordance with information that is publicly available and subject to the same regulatory regimes and good practice management controls as this Proposed Development.