

2. EIA Methodology

- 2.1. This Chapter sets out the general approach to, and methodology adopted for, the EIA. In particular, consideration is given to the process of scoping the EIA and the legislative framework within which the EIA was undertaken. Consideration is also given to the general approach and methods used to identify the likely significant effects of the three Development Scenarios outlined later in this Chapter. The generic criteria adopted to assess the significance of the likely effects are described, together with the general structure of the technical Chapters of this Environmental Statement (ES).
- 2.2. For a detailed description of the assessment methodologies and the specific significance criteria relating to each technical assessment, reference should be made to Chapters 7 to 16 inclusive and to Volume 3: *Townscape, Visual and Built Heritage Assessment*.

General Approach

- 2.3. This ES was prepared in accordance to The Town and Country Planning (Environmental Impact Assessment) Regulations 2011¹ (hereafter referred to as the 'EIA Regulations'). Reference was also made to current good practice guidance in EIA including:
- Amended Circular on Environmental Impact Assessment – A Consultation Paper (2006)²;
 - Environmental Impact Assessment: A Guide to Good Practice and Procedures. A Consultation Paper (2006)³;
 - Environmental Impact Assessment - A Guide to Procedures, Department of the Environment, Transport and Regions (DETR) (2000)⁴;
 - Circular 02/99 - Environmental Impact Assessment, DETR (1999)⁵; and
 - Impact Assessment Guidelines and ES Review Criteria from the Institute of Environmental Management and Assessment (IEMA) (2004)⁶.
- 2.4. The EIA identifies the likely significant environmental effects of each of the three Development Scenarios; details of the approach to the assessment of the Development Scenarios are provided later in this Chapter. Based on the findings of the various studies undertaken as part of the EIA, methods of avoiding, reducing or off-setting any potentially significant adverse effects (collectively known as 'mitigation measures') were developed. These mitigation measures are set out in each of Chapters 7 to 16, where relevant.
- 2.5. The likely significant effects to be addressed within the EIA, together with the general approach to the assessment of the Development Scenarios were agreed as part of the Scoping process; details of which are provided later in this Chapter.
- 2.6. Detailed technical studies were on-going throughout the design process, providing information about environmental issues and constraints that had the potential to affect all three Development Scenarios. The EIA comprised an assessment of both the likely significant beneficial and adverse environmental effects arising during both the demolition and construction phases of the three Development Scenarios and once they are completed and operational. In line with legislative requirements and best practice, the likely nature and significance of direct, indirect, secondary and cumulative short, medium and long-term, permanent and temporary, beneficial and adverse effects were identified, where applicable. The approach taken in the assessment of likely significant cumulative effects is summarised later in this Chapter.

Establishing Baseline Conditions

Background

- 2.7. At the time of undertaking the EIA, Mount Pleasant Sorting Office located to the south-east of the Site and adjoining the south-eastern boundary of the Calthorpe Street site was being refurbished and modernised by the Applicant as part of the wider consolidation of its operations across London. A number of planning applications have been submitted by the Applicant to LBI for determination (see Table 2.1 for details). Internal modernisation works to the adjacent Mount Pleasant Sorting Office are being undertaken under permitted development rights. The modernisation of the Mount Pleasant Sorting Office is expected to be completed by the end of 2013. Following consolidation and modernisation, the delivery / service yard and staff car park of the Mount Pleasant Sorting Office, which are known as the Calthorpe Street site and the Phoenix Place site respectively, will become available for redevelopment.
- 2.8. For the purposes of identifying the likely significant effects of a development, the baseline condition is the datum against which the assessment of likely changes (i.e. likely environmental effects) arising from construction or operational use of a development is made. These are generally taken to be the environmental characteristics of a development site (in terms of air quality, noise, geology, etc.) and its environs that exist immediately prior to construction of a new development. For many brownfield sites, the EIA baseline would therefore normally be the conditions that exist at the time the baseline studies were undertaken, or for which the latest data are available. However, because the Applicant is in the process of modernising the Mount Pleasant Sorting Office in order to consolidate its operations across London, the existing conditions of the Site are not considered an appropriate baseline.
- 2.9. Whilst the entire EIA could have been based on the existing conditions of the Site and surrounding area (i.e. those pertaining at the time the EIA was carried out) for many topics these would not be representative of the conditions that would exist immediately prior to the development commencing on the Site. Owing to the on-going changes to conditions on the Site and in the surrounding area (in relation to the modernisation of the adjacent Mount Pleasant Sorting Office), together with the Applicant's commitment to completing the Mount Pleasant Sorting Office modernisation works prior to redeveloping either the Calthorpe Street site and / or the Phoenix Place site, the existing conditions are not considered an appropriate datum against which to assess the environmental effects of the redevelopment proposals. Therefore, the assessments of the likely significant effects of the three Development Scenarios presented in this ES are based on the likely future baseline conditions of the Site and surrounding area. The approach to establishing the likely future baseline conditions, together with the principal assumptions made for the purposes of undertaking the EIA, are set out later in this Chapter.
- 2.10. It should be noted that in the case of noise (namely traffic generated noise) and air quality, the effects of the Development Scenarios are assessed using a comparison between 'with Development' and 'without Development' situations for the anticipated opening year, in accordance with standard practice. In this regard, quantification of a future baseline year is unnecessary and has not been undertaken for these specific issues. Further details regarding the methodologies employed are provided in Chapters 10 and 11 of this ES.

Existing Baseline Conditions

- 2.11. Whilst the EIA of the three Development Scenarios presented in the ES is based solely on the likely future baseline conditions of the Site and surrounding area, the existing conditions relevant to the particular assessment were initially identified to assist in establishing the likely future baseline conditions. The existing conditions of the Site and surrounding area were established through monitoring and walkover surveys, consultation with relevant authorities and data obtained from third parties. As the assessments are based solely on the likely future baseline conditions, the existing conditions of the Site and surrounding area are described only in Chapter 3: *Existing and Future Land Uses*, to provide context and for the purposes of describing the principal differences (where they exist) between the existing and likely future baseline conditions. In each technical Chapter of the ES and Volume 3: *Townscape, Visual and Built Heritage Assessment*, only the likely future baseline conditions are described. However, for some of the assessments where the modernisation of the Mount Pleasant Sorting Office does not affect the assessments (such as archaeology and socio-economics), the likely future baseline conditions are the same as the existing conditions. In all cases, any deviation from the approach to the future baseline described above is clearly stated in the technical Chapter.

Future Baseline Conditions

- 2.12. As described above, the Applicant is currently rationalising mail processing operations across London, which involves the refurbishment and modernisation of the Mount Pleasant Sorting Office adjoining the south-eastern boundary of the Calthorpe Street site. The Applicant has submitted a number of applications to LBI seeking permission to undertake external alterations to the Mount Pleasant Sorting Office, which are detailed in Table 2.1, together with the status of permission and the work undertaken at the time of undertaking the EIA. Further internal alterations and modernisation works undertaken within the Mount Pleasant Sorting Office are being undertaken under permitted development rights. The Applicant is committed to undertaking these modernisation works prior to the redevelopment of the Site to allow for the continued operation of the Mount Pleasant Sorting Office.

Table 2.1: Applications Submitted to London Borough of Islington for the Modernisation of Mount Pleasant Sorting Office

Proposal	Application Reference	Status
Installation of shop front on the western elevation of the Letter Office Building, to relocate the 'callers office'. Installation of canopy over east dock at lower ground floor level. Installation of window within existing door opening as part of improved layout to reception area.	P110624	Approved 17.05.11. Works on the site complete.
Installation of replacement windows and louvres. Windows non-material amendment for minor changes during the course of construction.	P120287 P120287(MA01)	Approved 17.04.12. Works on-going. Decision pending.
Erection of single storey reception building fronting Farringdon Road and erection of fourth floor level extension to public office building to house a lift over run.	P121232	Approved 16.08.12.
Advertisement Consent application for Royal Mail logos and 'Mount Pleasant' lettering on the Public Office Building.	P120691	Approved 22.05.12. Works on-going.
Advertisement Consent application for lettering on the south-east facade of the Letter Office Building.	P121435	Approved 28.08.12. Works on-going.
External alterations to the existing ground floor elevation of the Public Office Building to create a new shop front for the Post Office.	P121894	Approved 18.10.12.
Relocation of the Royal Mail Rathbone Place War Memorial within the south façade.	P122427	Approved 28.12.12.
External refurbishment of the Phoenix Place façade of the Letter Office Building.	P122295	Approved 12.12.12.
Public Office Building and Letter Office Building roof plant changes.	P2013/1135/FUL	Submitted 10.04.2013. Decision Pending.

- 2.13. The modernisation and refurbishment of the adjacent Mount Pleasant Sorting Office will result in the intensification of operations and the relocation of the international distribution operations elsewhere offsite. It is expected that works associated with the refurbishment of the Mount Pleasant Sorting Office, including the relocation of international distribution operations, will be completed by the end of 2013. Consequently, the Mount Pleasant Sorting Office works and any associated intensification of operations (such as an increased number of vehicle movements), form part of the likely future baseline conditions on and surrounding the Site. For the purposes of the EIA, it is assumed that there would be no other significant changes (apart from the cumulative schemes listed in Chapter 17: *Cumulative Effects*) to the land uses surrounding the Site.

- 2.14. Whilst separate permission was granted by LBI in June 2012 to relocate the British Postal Museum and Archive (BPMA) from the Mount Pleasant Sorting Office to Calthorpe House, 15 to 20 Phoenix Place, located immediately to the north of the Phoenix Place site, the development programme for the new BPMA is outside the Applicant's control. For this reason the new BPMA is considered as a cumulative scheme (see details later in this Chapter) rather than as part of the future baseline conditions.
- 2.15. The proposed modernisation and refurbishment of the Mount Pleasant Sorting Office and thus its future operations are defined by the planning applications set out in Table 2.1. Where applications have not yet been submitted to LBI or works are being carried out under permitted development rights, information provided by the Applicant was used to establish the likely future baseline conditions of the Mount Pleasant Sorting Office. The modernisation of the Mount Pleasant Sorting Office is described in Chapter 3: *Existing and Future Land Uses*.
- 2.16. Alongside the existing environmental conditions, an overview of the likely future baseline conditions of the Site and surrounding area is presented in Chapter 3: *Existing and Future Land Uses*. The principal differences between the existing and likely future baseline conditions are also set out in this Chapter. However, because the EIA was based on the likely future baseline conditions of the Site and surrounding area, the conditions presented in each of the technical Chapters are the likely future baseline conditions relevant to that particular assessment. For those assessments that are based on modelling (wind, townscape, visual and built heritage and daylight, sunlight and overshadowing), the future baseline conditions were modelled and a quantitative description provided. For the more qualitative assessments of this EIA such as archaeology, socio-economics and waste management, a qualitative description of the likely future baseline conditions is provided.

Assessment of Development Scenarios and Likely Significant Effects

- 2.17. As set out in Chapter 1: *Introduction*, a suite of planning applications has been submitted to LBI and LBC as appropriate for determination. Whilst the Applicant proposes the comprehensive redevelopment of the Site, it is possible that either the Calthorpe Street site or the Phoenix Place site could be developed in isolation. To facilitate the redevelopment of the Calthorpe Street site and allow for the continual 24 hour operations of the adjacent Mount Pleasant Sorting Office, the Enabling Works would be undertaken as the first phase of redeveloping the Calthorpe Street site. Consequently, the likely Development Scenarios for the Site are as follows;
- Development Scenario 1: the Entire Development (i.e. Calthorpe Street Development (which include the Enabling Works) and Phoenix Place Development);
 - Development Scenario 2: Calthorpe Street Development (which include the Enabling Works); and
 - Development Scenario 3: Phoenix Place Development.
- 2.18. Since the Enabling Works would be undertaken as the first phase of redeveloping the Calthorpe Street site, the Enabling Works are considered within Development Scenarios 1 and 2 but not part of Development Scenario 3, which could proceed without the Enabling Works being undertaken on the Calthorpe Street site. A description of the Calthorpe Street Development and the Phoenix Place Development are described in Chapter 5: *The Proposed Development*.
- 2.19. Chapters 7 to Chapter 16 inclusive and Volume 3: *Townscape, Visual and Built Heritage Assessment* present assessments of the likely significant effects of all three Development Scenarios against the likely future baseline conditions. The likely significant effects are identified for the demolition and construction works and for completed and operational Development Scenarios.

- 2.20. Where possible, the likely significant effects of each Development Scenario are quantified. Where this is not possible, a qualitative assessment is provided using professional judgement and experience. Where professional judgement and experience were used, or where uncertainty exists, this is noted in the relevant Chapter. Where the likely significant effects are the same for a number of Development Scenarios, this is also stated in the relevant Chapters.

Assessment of Development Scenarios and Cumulative Schemes

- 2.21. The EIA Regulations also require the likely significant cumulative effects of a development to be assessed. Effects that result from incremental changes caused by other present or reasonably foreseeable development schemes, in combination with those arising from the scheme, are known as 'cumulative effects'. There are two types of cumulative effect:
- **Type 1 Effects:** combination of individual effects resulting from the Development Scenarios, for example noise, dust and visual intrusion, on a set of defined sensitive receptors; and
 - **Type 2 Effects:** combined effects arising from another development(s), which individually may be insignificant, but when assessed in combination with effects arising from the Development Scenarios, could create a significant cumulative effect.
- 2.22. Type 1 Effects described above were assessed qualitatively using professional judgement and the findings of all the technical assessments (Chapter 7 to Chapter 16 inclusive and Volume 3: *Townscape, Visual and Built Heritage*). With respect to Type 2 Effects, the assessments were quantified, where possible. Where this was not possible, a qualitative assessment was carried out using professional judgement and experience.
- 2.23. To determine which permitted and 'reasonably foreseeable' schemes have the potential to give rise to significant cumulative effects in combination with the three Development Scenarios, a review of planning applications and emerging proposals was undertaken by DP9. In agreement with LBI and LBC, the following cumulative schemes were considered as part of the EIA:
- Site of former Charter House (also known as Caxton House) 2 Farringdon Road and Units 501-521 London Central Markets, Gate 30, 45 Charterhouse Street, London, EC1M 3HP (planning application reference: P120484);
 - Farringdon Station (Crossrail) / Thames link at Farringdon Station (planning application references: 09/00412/XRAIL, 10/00626/XRAIL and P/11/1453);
 - 29 to 39 Mount Pleasant and 5 Rosebery Avenue (planning application references: P121605 and P121606); and
 - BPMA, Calthorpe House, 15 to 20 Phoenix Place (planning application references: 2012/1897/P).
- 2.24. Because the modernisation of the adjacent Mount Pleasant Sorting Office will be completed before any development on the Site is started, the associated changes are taken into account in the future baseline conditions of the Site and surrounding area, and thus form the basis of the EIA. Accordingly, the on-going Mount Pleasant Sorting Office modernisation works were not considered as a 'cumulative scheme'.

- 2.25. For the purposes of the cumulative assessment, the above four cumulative schemes were modelled and quantitatively assessed, where possible, with Development Scenario 1 (i.e. the Entire Development across both the Calthorpe Street site and the Phoenix Place site). However, for the cumulative assessment with Development Scenario 2 (Calthorpe Street Development) and Development Scenario 3 (Phoenix Place Development), the results of the Development Scenario 1 cumulative assessment were used and extrapolated to identify and assess qualitatively (using professional judgement and experience) the likely significant cumulative effects associated with Development Scenarios 2 and 3. Exceptions to this approach are the air quality and noise assessments, which are inextricably linked to the traffic assessment; where trips assigned to the cumulative schemes, were already included within the traffic data used for the assessment of each Development Scenario.

Evaluation of Significance of Effects

- 2.26. The nature and significance of the likely environmental effects of the three Development Scenarios were assessed with reference to definitive standards and legislation, where available. The significance of the likely effects was assessed with reference to bespoke criteria for each environmental topic. These criteria apply a common EIA approach in order to classify the likely effects according to whether they are substantial, moderate or minor, and whether they are adverse or beneficial.
- 2.27. Specific criteria for each environmental topic were developed, having due regard to the following factors:
- Extent, magnitude and reversibility of the likely effect;
 - Duration of the effect (whether short, medium or long-term);
 - Nature of the effect (whether direct or indirect, reversible or irreversible);
 - Whether the effect occurs in isolation, is cumulative or interactive;
 - Performance against environmental quality standards or other relevant pollution control thresholds;
 - Sensitivity of the receptor; and
 - Compatibility with environmental policies.
- 2.28. For issues where definitive quality standards do not exist, the significance criteria was based on the:
- Local, district, regional or national scale of value of the resource affected;
 - Number of receptors affected;
 - Sensitivity of the receptors affected; and
 - Duration of the likely effect.
- 2.29. In order to provide a consistent approach to expressing the outcomes of the various assessments undertaken as part of the EIA, and thereby enable comparison between likely significant effects on different environmental resources or receptors, the following terminology is used throughout the ES. The likely significant effects are expressed as:
- adverse: detrimental or negative effects on an environmental resource or receptor;
 - negligible: no significant effects on an environmental resource or receptor; and
 - beneficial: advantageous or positive effects on an environmental resource or receptor.

- 2.30. Where adverse or beneficial effects were identified, these were assessed against the following scale:
- minor: slight, very short or highly localised effects;
 - moderate: limited effects (by extent, duration or magnitude) which may be considered significant; and
 - substantial: considerable effects (by extent, duration or magnitude) of more than local significance or in breach of recognised acceptability, legislation, policy or standards.
- 2.31. For the townscape, visual and built heritage assessment the likely effects are expressed differently to those described above. The method used to assess the likely significant townscape, visual and built heritage effects is described in Volume 3.
- 2.32. Each of the technical Chapters sets out the relevant significance criteria, including sources and justifications, for quantifying the different levels of effect. Where possible, this is based on quantitative and accepted criteria (for example, air quality standards contained in the National Air Quality Strategy⁷ and noise assessment guidelines set out and guidelines provided by the World Health Organisation⁸ and BS 8233:1999⁹). Elsewhere, value judgements and expert interpretations are used to establish to what extent a predicted effect would be environmentally significant.
- 2.33. In the context of the assessments of the three Development Scenarios, short to medium term effects are those associated with the demolition and construction works, and long-term effects are those associated with the three Development Scenarios once completed and operational. Local effects are those affecting receptors within and close to the Site, whilst effects on receptors within the wider LBC or LBI administrative areas are assessed at a district level. Sub-regional effects are those affecting adjacent Boroughs, whilst effects on Greater London are assessed at a regional level. Effects on different parts of the country, or England as a whole, are considered to be at a national level. Effects traversing national boundaries are considered at an international level.

Location of Information in the Environmental Statement

- 2.34. The EIA Regulations state that an ES must include information identified in Part 1 of Schedule 4; that is:
- “(a)...reasonably required to assess the environmental effects of the development and which the applicant can, having regard in particular to current knowledge and methods of assessment, reasonably be required to compile but (b) that includes at least the information referred to in Part 2 of Schedule 4”.*
- 2.35. The list of information referred to in Part 1 of Schedule 4 of the EIA Regulations, together with the relevant Chapter references indicating where such information is provided within the ES, is set out in Table 2.2.

Table 2.2: Location of Information within the Environmental Statement

Specified Information	Location within Environmental Statement
1 Description of the development, including in particular:	
(a) A description of the physical characteristics of the whole development and the land-use requirements during the construction and operational phases.	Chapter 5: <i>The Proposed Development</i> Chapter 6: <i>Development Programme, Demolition and Construction</i>
(b) A description of the main characteristics of the production processes, for instance, nature and quantity of materials used.	Chapter 6: <i>Development Programme, Demolition and Construction</i> Chapter 7: <i>Waste Management</i>
(c) An estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development. A description of the forecasting methods used to assess the effects on the environment.	Chapter 7: <i>Waste Management</i> Chapter 10: <i>Noise and Vibration</i> Chapter 11: <i>Air Quality</i> Chapter 13: <i>Ground Conditions and Contamination</i> Chapter 16: <i>Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare</i>
2 An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects.	Chapter 4: <i>Alternatives and Design Evolution</i>
3 A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and inter-relationship between the above factors.	Chapter 3: <i>Existing and Future Land Uses</i> All technical Chapters (Chapters 7 to 16) Chapter 17: <i>Cumulative Effects</i> Volume 3: <i>Townscape, Visual and Built Heritage Assessment</i>
4 A description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from:	
(a) The existence of the development;	All technical Chapters (Chapter 7 to 16) Chapter 17: <i>Cumulative Effects</i> Chapter 18: <i>Likely Residual Effects</i> Volume 3: <i>Townscape, Visual and Built Heritage Assessment</i>
(b) The use of natural resources;	Chapter 5: <i>The Proposed Development</i> Chapter 6: <i>Development Programme, Demolition and Construction</i> Chapter 7: <i>Waste Management</i>

Specified Information	Location within Environmental Statement
(c) The emission of pollutants, the creation of nuisances and the elimination of waste.	Chapter 5: <i>The Proposed Development</i> Chapter 6: <i>Development Programme, Demolition and Construction</i> Chapter 7: <i>Waste Management</i> Chapter 10: <i>Noise and Vibration</i> Chapter 11: <i>Air Quality</i> Chapter 13: <i>Ground Conditions and Contamination</i> Chapter 16: <i>Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare</i> Chapter 17: <i>Cumulative Effects</i>
5 A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.	All technical Chapters (Chapters 7 to 16) Volume 3: <i>Townscape, Visual and Built Heritage Assessment</i>
6 A non-technical summary of the information provided under paragraphs 1 to 5 of this Part.	Non-Technical Summary (separate document)
7 An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.	Chapter 2: <i>EIA Methodology</i> All technical Chapters (Chapters 7 to 16) where appropriate.

Scoping the Environmental Impact Assessment

- 2.36. 'Scoping' is an important stage of the EIA process, and involves focusing the study (and hence the ES) on those issues of greatest likely significance. Scoping is also important in identifying the potentially significant effects associated with the demolition and construction works and the completed development, thereby ensuring that appropriate mitigation options and environmental management controls are considered.
- 2.37. An EIA Scoping Report setting out the general approach to the EIA and the potential effects to be addressed in the EIA was prepared by Waterman Energy, Environment & Design Ltd (Waterman EED). The key environmental effects set out in the EIA Scoping Report were identified through a review of available up to date baseline information, including survey information, together with preliminary information about the design of the Development Scenarios. The EIA Scoping Report (a copy of which is provided in Appendix 2.1) was submitted to LBI and LBC on the 29 October 2012, together with requests for formal Scoping Opinions under Regulation 13 of the EIA Regulations. This provided LBI, LBC and statutory consultees with the opportunity to comment on the content and methodologies to be used for the EIA. A Scoping Opinion was received from LBI on the 10 December 2012 and a separate Scoping Opinion was received from the LBC on the 8 January 2013 (copies of which are presented in Appendix 2.2). In response to issues raised in the EIA Scoping Opinions, Waterman EED issued a Memorandum to LBI and LBC providing clarification and revisions to the proposed baseline, approach and scope of the EIA on the 15 January 2013. A copy of the Memorandum is also presented in Appendix 2.2. A response to the Memorandum was received from LBC on the 14 February 2013; a copy of which is provided in Appendix 2.2.
- 2.38. Based on the EIA Scoping Report, Scoping Opinion and subsequent discussions with LBI and LBC (Memorandum), it was agreed that the EIA would cover the following topics:
- Waste;
 - Socio-economics;
 - Transportation and Access;
 - Noise and Vibration;
 - Air Quality;
 - Archaeology;
 - Ground Conditions and Contamination;
 - Water Resources and Flood Risk;
 - Wind;
 - Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare;
 - Townscape, Visual and Built Heritage; and
 - Cumulative Effects.
- 2.39. It was agreed with LBI and LBC through the Scoping process that the following topics could be scoped out of the EIA:
- Ecology: an ecological appraisal was carried out for the Site in September 2012. Based on the Extended Phase 1 Habitat Survey, the habitats on the Site are considered to be of negligible ecological value, with the exception of trees, which are considered to be of ecological value within the Site only. Therefore, the habitats on the Site are considered to have a negligible potential to support amphibians, badgers, bats, invertebrates or other protected or notable species, although the trees were considered to have some potential to support common bird species. Measures are set out in the Ecological Appraisal (see Appendix 2.3) to minimise disturbance to birds during the demolition and construction works;

- Internal Daylight, Sunlight and Overshadowing: the analysis of the internal daylight and sunlight levels within the proposed residential accommodation, together with the analysis of overshadowing (sun on the ground) of the proposed public and communal outdoor amenity spaces within the Site will focus on demonstrating whether acceptable levels are achieved within the development itself because no baseline conditions currently exist. Therefore the internal daylight, sunlight and overshadowing analysis is presented separately from the ES as a standalone report; and
 - Energy, Sustainability and Climate Change: whilst a summary of the sustainability features, including measures to minimise energy consumption would be set out in Chapter 5: *The Proposed Development*, energy consumption and carbon dioxide emissions (which are indirectly related to the urban heat island effect) will be considered within the Sustainable Design and Construction Statement that accompany the planning applications.
- 2.40. During the EIA scoping process, LBC and LBI requested that a Health Impact Assessment should be undertaken as part of the EIA. Therefore a Health Impact Assessment was undertaken but is presented outside of the ES as a standalone document that accompanies the planning applications.

Consultation Process

- 2.41. Key stakeholders were consulted at various stages throughout the design and EIA process. The following statutory and non-statutory organisations were consulted with regard to the methodologies of the EIA and the likely significant environmental effects of the Development Scenarios:
- LBI;
 - LBC;
 - Greater London Authority (GLA);
 - Transport for London (TfL);
 - Thames Water;
 - English Heritage;
 - Environment Agency;
 - Natural England; and
 - Local interest groups and residents.
- 2.42. Copies of consultation responses received directly by the EIA consultancy team in addition to those received by LBI and LBC as part of their consultation process are provided in Appendix 2.2.
- 2.43. Each technical Chapter sets out relevant consultation undertaken specific to the assessment under the Assessment Methodology section. All relevant comments from the consultees relating to the EIA, whether made directly to the EIA consultancy team or through the Scoping Opinion, are addressed in the relevant technical Chapters of the ES (Chapters 7 to 16 inclusive) and Volume 3: *Townscape, Visual and Built Heritage Assessment*. A summary of the comments, together with a reference to the location within the ES or other documents where the comments are addressed, is presented in Table 2.3.

Table 2.3: Issues Raised During the EIA Scoping and Consultation Process

Consultee	Issue Raised	Chapter Where Issue Addressed
LBI / LBC Case Officers	Establishing future baseline conditions. It was agreed that the EIA will be based on the likely future baseline conditions of the Site and surrounding area rather than existing conditions.	Chapter 2: <i>EIA Methodology</i> Chapter 3: <i>Existing and Future Land Uses</i> Chapter 7 to 16 inclusive Volume 3: <i>Townscape, Visual and Built Heritage Assessment</i>
	Consideration of the likely significant effects on town centres and important retail frontages.	Chapter 8: <i>Socio-economics</i>
	Consideration of additional demand on local schools, healthcare facilities and public amenity space.	Chapter 8: <i>Socio-economics</i>
	Consultation with English Heritage (Greater London Archaeology Advisory Service).	Chapter 12: <i>Archaeology</i>
	Additional cumulative scheme should be considered.	Chapter 17: <i>Cumulative Effects</i>
	Heritage Assessment should be included.	Chapter 12: <i>Archaeology</i> Volume 3: <i>Townscape, Visual and Built Heritage Assessment</i>
	Arboricultural Survey should be included in ES.	Chapter 3: <i>Existing and Future Land Uses</i>
LBI Environmental Health Officer	Noise nuisance on future residents associated with traffic generated from the adjacent Mount Pleasant Sorting Office.	Chapter 10: <i>Noise and Vibration</i>
	Consideration of noise on the Farringdon Road / Theobald's Road 'Important Area' as per the Noise Action Plan.	
	Consideration of the noise environment to residents as a result of building material and design of spaces (such as the enclosed courtyards).	
Environment Agency	Risk of flooding of the Site from sources other than fluvial. Surface Water Strategy should be undertaken as part of the Flood Risk Assessment and should meet Policy 13 of the London Plan.	Chapter 14: <i>Water Resources and Flood Risk</i> Appendix 14.1: <i>Flood Risk Assessment</i>
Thames Water	Consideration is given to the increased demand on potable water consumption and waste water.	Chapter 14: <i>Water Resources and Flood Risk</i>

- 2.44. A number of workshops and consultation meetings were held with LBI and LBC to present the proposals and allow feedback to be taken into account through the design process. Presentations were also made to the Joint Borough Development Management Forum, Amwell Society and the Finsbury Ward partnership, which was open to members of the public. A public exhibition of the initial proposals was held in 18th to 20th October 2012 and a further public exhibition was held on the 14 to 16 March 2013 providing a forum for the public to comment on the proposals. Specific details of the public consultation are set out in the Statement of Community Involvement, which accompanies the planning application. This includes: a description of the approach taken to the public consultation; the stakeholders / community groups involved; an outline of the key outcomes; and an explanation of how the outcomes were considered and addressed in the design process.

Structure of the Technical Chapters of the Environmental Statement

- 2.45. The EIA process assesses the likely significant environmental effects of the three Development Scenarios. Each environmental topic considered in the EIA is assigned a separate Chapter in the ES (Chapters 7 to 16 inclusive), and within each of these Chapters, the assessment is presented in the following format:

Introduction

- 2.46. The introduction of each Chapter provides a brief summary of the issues considered in the Chapter, confirms the author and highlights relevant appendices which accompany the Chapter.

Legislation and Planning Policy

- 2.47. This section includes a review of any relevant legislation, national, regional and local planning policy, published standards, guidelines and best practice. It is important to note that a full appraisal of the Development Scenarios against planning policies is provided in the Planning Statement, which accompanies the planning applications.

Assessment Methodology and Significance Criteria

- 2.48. The Assessment Methodology and Significance Criteria section of each Chapter sets out the methods used in establishing the likely future baseline conditions relevant to the assessment and the approach to undertaking the assessment of the three Development Scenarios. This is followed by an explanation of the significance criteria used to identify the likely environmental effects with reference to published standard guidelines, best practice. The limitations and assumptions of the assessment are also defined in this section of each Chapter. This section of each Chapter also describes the specific consultation undertaken to agree the scope or methodology of the assessment.

Future Baseline Conditions

- 2.49. In order to assess the likely significant effects of the three Development Scenarios, it is necessary to establish the environmental conditions that exist on and surrounding the Site, in the absence of the Development Scenarios. As outlined above, the EIA was based on the likely future baseline conditions of the Site and surrounding area, whereby it was assumed that the modernisation of the adjacent Mount Pleasant Sorting Office will be completed prior to any development on the Site is started. The likely future baseline conditions relevant to each assessment are set out in this section of each of the technical Chapters.

Likely Significant Effects

- 2.50. This section of each Chapter presents the assessment of the likely significant effects of the following three Development Scenarios:
- Development Scenario 1: the Entire Development (i.e. Calthorpe Street Development (which include the Enabling Works) and Phoenix Place Development);
 - Development Scenario 2: Calthorpe Street Development (which include the Enabling Works); and
 - Development Scenario 3: Phoenix Place Development.
- 2.51. The likely significant effects are identified and described for both the demolition and construction works associated with each of the Development Scenarios and once they are completed and operational. The assessments were carried out in relation to the relevant likely future baseline conditions as described in the Future Baseline Conditions section of the Chapter. An evaluation of the significance of the likely effect is provided in accordance with the criteria defined earlier in the Chapter.

Mitigation Measures

- 2.52. One of the principal aims of the EIA is to assist in developing mitigation measures to prevent, reduce and where possible, offset potentially significant adverse effects of a development. An iterative approach was adopted towards the design of the Development Scenarios, which evolved in parallel with the EIA process. This enabled many mitigation measures to be designed into the Development Scenarios, thereby reducing the need for further mitigation. Mitigation measures can relate to design, construction or the activities associated with the completed development. Examples include:
- **Design:** design solutions, such as the massing, position or orientation of buildings within the Site. These have predominantly been incorporated into the Proposed Development as it has evolved and are therefore described in Chapter 4: *Alternatives and Design Evolution* and Chapter 5: *The Proposed Development* and would not be considered under the Mitigation Measures section;
 - **Construction:** commitment to undertake the construction works in a specific way, for example, the use of particular plant, phasing of the works, regular monitoring and implementation of Construction Environmental Management Plans (CEMP) for each Development Scenario; and
 - **Completed Development:** additional measures, over and above those included within the design, which the Applicant would commit to in order to further prevent, reduce and, where possible, offset significant adverse effects of a completed development. For example, specific façade and glazing design to provide sufficient noise insulation, implementation of a Travel Plan to reduce car usage and contribution to offsite community facilities through a Section 106 Agreement.
- 2.53. Where potentially significant adverse environmental effects were identified, the Applicant is committed to implementing the appropriate mitigation measures as set out in the relevant technical Chapters. The Applicant has also committed to implement mitigation to enhance potentially beneficial effects, where practicable.

Likely Residual Effects

- 2.54. This section describes the nature and significance of the likely residual effects of the Development Scenarios, assuming the implementation of the proposed mitigation measures. The significance of the likely residual effects is identified in accordance with the criteria defined for the respective assessment.

Conclusions

- 2.55. This section of each Chapter provides a brief summary of the findings of the assessment in relation to the relevant environmental issue.

Structure of Townscape, Visual and Built Heritage Assessment

- 2.56. The Townscape, Visual and Built Heritage Assessment forms an integral part of the EIA but is presented as a separate volume of the ES (Volume 3). This assessment evaluates the likely changes to townscape quality and character as a result of the Development Scenarios and provides an assessment of their likely significant effects on key views, which were agreed with LBI and LBC, using Accurate Visual Representations. Consideration is given to the likely significant effects of the Development Scenarios on built heritage (above ground), including the setting of listed buildings and Conservation Areas.

Assumptions and Limitations

- 2.57. The principal assumptions that were made, and any limitations that were identified in undertaking the EIA, are set out below. Assumptions and limitations specifically relevant to each assessment are described in each technical Chapter.
- The assessments reported in the ES are based on the designs, drawings and floorspace schedules submitted as part of the planning applications;
 - Where flexible Use Classes are sought, the assessments presented in this ES are, where necessary, based on the Use Class that is most likely to present a worst case assessment;
 - The assessment of demolition and construction-related effects are based on the indicative demolition and construction timetable and methodologies as provided by the project team and agreed by the Applicant;
 - It is assumed that information received from third parties is appropriate, complete and up to date;
 - All of the principal existing land uses adjoining the Site remain substantially unaltered (i.e. the receptors remain the same), with the exception of the cumulative schemes listed above and the changes associated with the modernisation of the Mount Pleasant Sorting Office;
 - The changes to the adjacent Mount Pleasant Sorting Office as a result of modernisation works are based on planning application drawings and supporting information previously submitted to LBI and information provided by the Applicant;
 - Development Scenarios 1, 2, and 3 are the only possible scenarios that could be implemented. It is assumed that the Enabling Works would only be undertaken as the first phase of the Calthorpe Street Development and therefore are only considered for Development Scenario 1 and 2. It is assumed that the Phoenix Place Development could proceed without implementing the Enabling Works on the Calthorpe Street site;

- The modernisation works of the adjacent Mount Pleasant Sorting Office, as described in Chapter 3: *Existing and Future Land Uses* will be completed prior to any of the three Development Scenarios commencing;
- The design, construction and operation of any of the Development Scenarios would satisfy environmental standards consistent with contemporary legislation, practice and knowledge as a minimum, but would also strive to achieve best practice at the time of the works where, reasonable; and
- The details of the CEMPs (for each Development Scenario) would be discussed and agreed with the LBI and LBC following the granting of planning permission for any of the Development Scenarios, to control subsequent construction activities. The CEMPs would be enforced and monitored during all key stages of the demolition and the construction of any of the Development Scenarios.

References

- 1 The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (Statutory Instrument No. 1824).
- 2 Department for Communities and Local Government (DCLG) (2006) Amended Circular on Environmental Impact Assessment: A consultation paper.
- 3 DCLG (2006) Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper.
- 4 DETR (2000) Environmental Impact Assessment - A Guide to Procedures, Department of the Environment, Transport and Regions (DETR).
- 5 DCLG (1999) Circular 02/99: Environmental impact assessment.
- 6 IEMA (2006) Impact Assessment Guidelines and ES Review Criteria from the Institute of Environmental Management and Assessment.
- 7 HMSO, Department of the Environment (1997) 'The UK National Air Quality Strategy', HMSO.
- 8 World Health Organisation, 1999. 'Guidelines for Community Noise'.
- 9 BSI, 1999. BS8233 Sound Insulation and Noise Reduction for Buildings - Code of Practice.