

## 11 Cumulative Impact Assessment



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## Introduction

**11.1** This chapter of the ES assesses the impact of the Proposed Development in conjunction with the potential environmental impacts of other consented developments in the area. This chapter has been written by URS. The developments taken into consideration are either under construction at present, have planning permission, or been submitted for planning and therefore have reasonable prospects of being undertaken in the foreseeable future (i.e. with planning permission).

**11.2** By definition, cumulative impacts are those that result from incremental changes caused by other past, present or reasonably foreseeable actions together with the Proposed Development. For the cumulative assessment, two types of impact have been considered:

- The combined impact of individual impacts, for example noise, airborne dust or traffic on a single receptor; and
- The combined impacts of two or more development schemes which may, on an individual basis be insignificant but, cumulatively, have a significant impact.

**11.3** This chapter describes the scope of the cumulative assessment in terms of the other schemes under review and the potential for cumulative impacts and mitigation measures (if applicable) to prevent, reduce or offset the impacts identified.

## Legislative Context

**11.4** The following outlines legislative guidance regarding assessment of cumulative impacts:

- European Directive 2011/92/EU (Ref. 11-1) requires assessment of *“the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the project”*;
- Schedule 3(1) of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (Ref. 11-2) states that *“the characteristics of development must be considered having regard, in particular to ... b) the cumulation with other development”*; and
- Schedule 3(2) of the EIA Regulations *“the existing land use”* and Schedule 4(4) *“description of the likely significant effects of the development on the environment, which should cover... cumulative effects”*.

## Assessment Methodology

### **Combined Impacts of Individual Impacts from the Proposed Development on a Particular Receptor**

**11.5** The combined impacts of individual impacts from the Proposed Development on a particular receptor have been assessed using the experience and judgment of each technical specialist. These are called impact interactions, and, where present, they are by their nature impractical to quantify and thus are expressed qualitatively.

### **Combined Impacts of the Proposed Development with Other Schemes**

**11.6** Typically an EIA will consider schemes located within 1 kilometre (km) of the application site, and which are of sufficient scale (i.e. those which either comprise over 50 residential units or provide over 10,000 square metres (m<sup>2</sup>) of floorspace), and have either been submitted for planning or consented. Table 1, within the EIA Scoping Report included in Technical Appendix A of Volume III of this ES, provides a description of all the projects identified during scoping, to be considered for inclusion in the cumulative impact assessment.

**11.7** However, a review of the projects within this scope suggests that significant cumulative impacts are unlikely in many cases, owing to the relatively small size and scale of the Proposed Development, the nature of the schemes identified, and the likelihood of interactions with the Proposed Development given the

environmental topics to be considered in the ES. Therefore, only the projects set out in Table 11-1 below are included in the cumulative impact assessment.

**11.8** The Crossrail works for the Fisher Street intervention shaft and head house are not considered as part of the cumulative impact assessment as there is no overlap in terms of the construction programme.

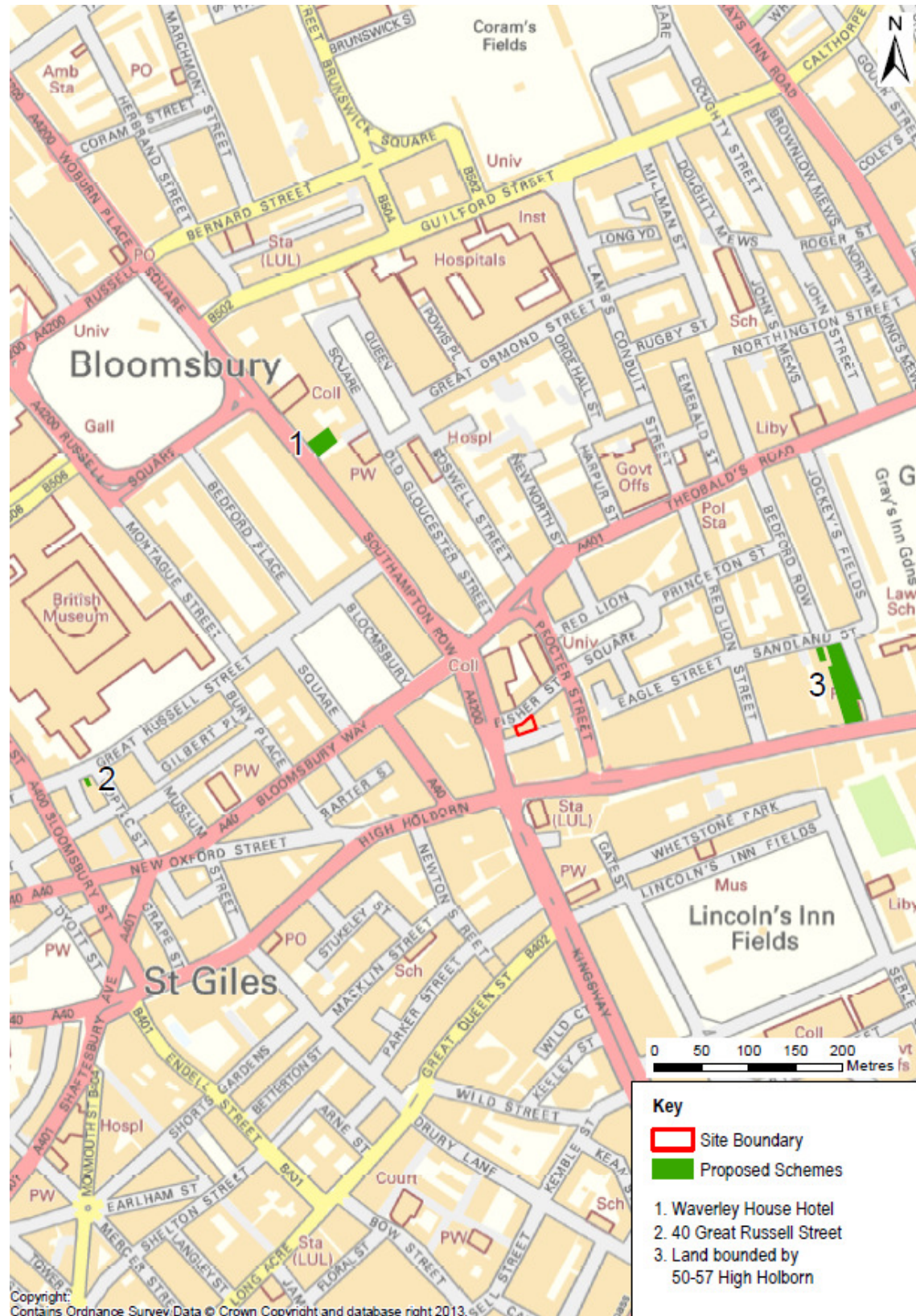
**Table 11-1 Schedule of Cumulative Schemes**

Application Number	Site Address	Description of Scheme	Decision
2011/4 011/P	Waverley House Hotel	Erection of a 7 storey side extension and 5 storey rear extension to provide enclosed fire escape stair and additional sitting rooms to guestrooms of existing hotel (Class C1).	Granted
2010/6 917/P	40 Great Russell Street	Change of use from showroom/office (Class B1) to 2 x 1-bed residential flats (Class C3) at first and second floor level and the erection of a four storey plus basement rear extension including rear roof terrace at first floor level.	Granted Subject to a Section 106 Legal Agreement
2010/5 725/P	Land Bounded by 50-57 High Holborn	Revisions to planning permission 2009/0675/P, dated 07/07/2009 for mixed use redevelopment of the site involving the part demolition, part retention and part erection of new eight storey (plus two level basement and roof plant floor) building to accommodate A1, flexible A3/A4, B1, residential and student units. Revisions relate to variations in building envelope, office and retail space, including an overall reduction of office (Class B1) accommodation by 552sqm and overall increase of retail (Class A1) by 426sqm (as a result of reduction of floor to ceiling heights at ground and first floor levels, relocation of plant room to basement to create an eighth floor of office (Class B1) accommodation and various other internal reconfigurations, and to create ground floor retail units on Hand Court (west) elevation; increase in parapet height at seventh and eighth floor levels on Brownlow Street (east) elevation by 1.1m, increase in height of mansard roof associated with High Holborn House on south elevation by 1m; alteration to location of service yard entrance (to the south) and kerb (to the west to widen the highway) on Brownlow Street, retention of Brownlow Street highway to High Holborn (as opposed to 2009/0675/P which pedestrianised part of Brownlow Street) and associated alterations.	Granted Subject to a Section 106 Legal Agreement



# 11 Cumulative Impact Assessment

Figure 11-1 Location of Proposed Schemes for Cumulative Assessment



## Cumulative Impact Assessment

11.9 The information which is publicly available regarding the identified cumulative schemes has been reviewed to determine what potential cumulative impacts could arise. Where no cumulative impacts have been identified, this is also stated.

### Combined Impacts of Individual Impacts from the Proposed Development on a Particular Receptor

11.10 It is considered that the construction phase of the Proposed Development has the greatest potential to contribute to impact interactions.

11.11 During the construction phase, potential impact interactions may affect nearby sensitive receptors particularly, local businesses, pedestrians and the general public.

11.12 Potential impact interactions are largely related to noise, vibration and dust. During the construction phase, the compliance with the mitigation measures as detailed in **Chapter 6: Construction**, **Chapter 7: Air Quality** and **Chapter 8: Noise and Vibration** will reduce as far as possible these impact interactions.

11.13 Overall, it is anticipated that impact interactions on the closest sensitive receptors, as well as passing pedestrians and cyclists, would occur during the construction phase. However these would be intermittent and temporary, typical of any small construction site in an urban area and therefore **NSig**.

11.14 There will be **NSig** impact interactions during the operation of the Proposed Development.

### Combined Impacts of the Proposed Development with Other Schemes

11.15 The following provides an assessment of the potential cumulative impacts associated with each environmental aspect and their likely significance. Where no cumulative impact has been identified this is also stated.

11.16 To minimise cumulative impacts from multiple construction sites, the Principal Contractor will be encouraged to undertake regular liaison meetings and reviews with the principal contractors at neighbouring construction sites (if applicable) to plan works so that they do not cause unnecessary disruption.

### Air Quality

11.17 If the construction programmes overlap, there is the potential for cumulative impacts during the construction activities from the Proposed Development and the other proposed schemes. However, given the localised extent of any construction site plant emissions and demolition and construction dust and the distance between the proposed schemes, it is anticipated that cumulative impacts will be **NSig**. It is also expected that a DCMS and EMP will be prepared for the construction sites and agreed with LBC before any on-site works begin, which would further reduce the potential for any significant cumulative impacts.

11.18 The Proposed Development incorporates no parking spaces and has low levels of vehicular servicing. Therefore, it is not considered that there will be any significant cumulative impacts associated with the operational phase (i.e. a cumulative impact of **NSig**).

### Noise and Vibration

11.19 In terms of construction noise and vibration impacts, the distance from the majority of the proposed schemes and the sensitive receptors along with acoustic screening provided by intervening buildings is such that likely cumulative construction noise levels are deemed to be **NSig**.

# 11 Cumulative Impact Assessment

**11.20** The distance from the proposed schemes to all receptors is such that cumulative vibration impacts are also anticipated to be **NSig**.

**11.21** The Proposed Development incorporates no parking spaces and has low levels of vehicular servicing. Therefore, it is not considered that there will be any significant cumulative impacts associated with the operational phase in terms of operational traffic noise (i.e. a cumulative impact of **NSig**).

**11.22** In terms of noise from building services plant, it is assumed all consented developments would design and install building services plant to be below the existing background noise level and given the distance between the proposed schemes, the cumulative impact is likely to be **NSig**.

## *Waste and Recycling*

**11.23** The waste and recycling chapter of this ES is informative and does not provide an assessment per se, and therefore there is no requirement to use significance criteria in this cumulative impact assessment.

**11.24** Throughout the construction phases of the Proposed Development, the principal contractor will undertake various measures to reduce waste generated on the application site. There will be no groundwork associated with the construction of the Proposed Development, minimising the production of waste usually associated with this phase of a project. However, some site preparation works are expected to take place prior to construction activities due to breakout of existing concrete piles and removal of temporary cladding and structures. In total, these activities are expected to generate approximately 628m<sup>2</sup> of excavation materials. In-line with the SWMP Regulations, the Proposed Development will require a SWMP identifying the types and quantities of waste that will be produced during the construction phase. The SWMP will be produced by the principal contractor prior to the commencement of any on-site work. The SWMP will identify all waste streams and will discuss the potential to reduce, re-use and recycle all materials wherever possible.

**11.25** Once operational, the Proposed Development aims to be a sustainable development with high standards of environmental performance. As such, due consideration has and will continue to be given to the waste generated during its operation. Waste management within the Proposed Development will aim to contribute towards achieving current and long-term Government, GLA and the LBC's targets for waste minimisation, recycling and re-use.

**11.26** Therefore, there is likely to be a negligible cumulative effect overall.

## *Daylight and Sunlight*

**11.27** There are no proposed schemes in close proximity of the application site, which could have an additional impact on the sensitive receptors, namely 8-10 Southampton Row, which have been identified in the daylight and sunlight assessment. Therefore, there is no cumulative impact to be considered.

## *Townscape, Built Heritage and Visual Impact*

**11.28** The proposed schemes outlined above, for consideration in the cumulative assessment, are not close enough to the application site to be seen and experienced in conjunction with the Proposed Development and therefore not close enough to have a cumulative visual impact.

**11.29** Therefore, a cumulative visual impact assessment has not been provided in Volume II of this ES.

## References

Ref. 11-1 European Commission (2011); Directive on the assessment of the effects of certain public and private projects on the environment (2011/92/EU).

Ref. 11-2 Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (SI 2011/1824).