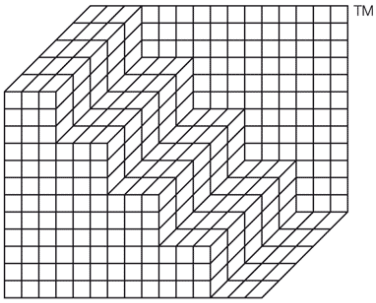

Buro Happold

St Giles Circus

Environmental Impact Assessment Scoping

028676

12 March 2012

Revision 01

Revision	Description	Issued by	Date	Checked
00	Draft for review by Turley Associates	KES	17/02/12	SAM
01	Final submitted to Camden Council	KES	12/03/12	TC

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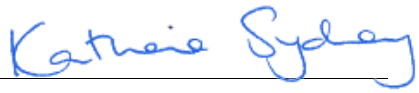
author	**Katherine Sydney**
signature	
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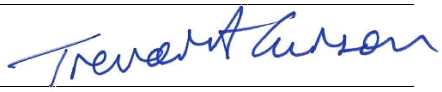
approved	**Trevor Curson**
signature	
date	**12 March 2012**

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Contents

Table of Tables

Table of Figures

Glossary

Term	Definition
BRE	Building Research Establishment
BREEAM	BRE Environmental Assessment Method
EIA	Environmental Impact Assessment
PPG / PPS	Planning Policy Guidance / Planning Policy Statement
PTAL	Public Transport Accessibility Level

Executive Summary

St Giles Circus is in a busy urban location with important cultural heritage relating to the music industry. The proposals include a mixture of new buildings and refurbishment of existing properties. The main focus of the scheme will be new buildings which will provide a venue for events, hospitality, information, retail and leisure. Refurbishment will provide commercial and residential accommodation. A number of potentially significant environmental impacts have been identified, which may arise from the scheme; these are described below.

Townscape and visual impact: the site is in a prominent location and the proposals will represent a significant change over the existing. Impacts will be assessed in line with Landscape Institute best practice guidance.

Noise and vibration: construction will generate noise and vibration, as will events during operation. Baseline noise monitoring will be undertaken and predicted noise levels will be assessed with reference to British Standards.

Archaeology: the site has archaeological potential, so the impacts will be determined through desk study and an analysis of existing building depth and proposed ground works.

Built heritage: there are a number of listed and locally important buildings on site; the impact assessment will determine the significance of changes to the fabric of these and their setting, working closely with the archaeology and townscape consultants.

Transport and movement: the site is very well served by public transport, but servicing by large vehicles and high pedestrian flows during some events may be significant. These will be assessed within a standalone Transport Assessment, which will be reported upon in the Environmental Statement.

Waste management: large volumes of waste are expected to be generated during construction and operation, particularly during events. Waste management strategies will be developed, alongside the logistics strategy. The significance of impacts relating to waste will then be assessed.

Artificial lighting: large internal media screens, façade lighting and external lighting will all contribute to light spill. This will be assessed with reference to Building Research Establishment guidance.

Wind microclimate: the adjacent Centre Point building contributes to an uncomfortable wind microclimate within the St Giles Circus site. Potential problem areas will be determined with a desk study, which will inform an assessment of the appropriateness of external spaces for their proposed uses.

Ground conditions and contamination: parts of the site are on made ground and, although some existing data exists, the risk of contamination and unexploded ordnance is not fully understood. Therefore a preliminary risk assessment will be undertaken.

Water resources and flood risk: although there is no risk of flooding from rivers, there is a chance that basements could be flooded by surface or groundwater. A Flood Risk Assessment will be prepared, in line with planning policy, and will be reported upon in the Environmental Statement.

The following topics have been scoped out of further assessment as no significant impacts are anticipated: social, cultural & economic impacts, air quality, ecology, and sunlight / daylight & overshadowing.

1 Background

St Giles Circus is intended to be a mixed use development providing a venue for events, hospitality, information, retail and leisure.

The proposals for redevelopment of the St Giles Circus site, around Denmark Street, are being brought forward by Consolidated Developments; the aim being to submit a full planning application in June 2012. In the London Borough of Camden Council's 2004 Planning Brief for Denmark Place, a key objective for development of the site is said to be: *"the highest architectural, urban and environmental design standards"*; and planning policy requires that the project achieves a BREEAM rating of Very Good.

1.1 Environmental Impact Assessment and scoping

As an urban development project of greater than 0.5 hectares in area, the proposals fall under Schedule II of the Environmental Impact Assessment (EIA) Regulations (1999), and could require EIA. The developer has decided to prepare a full EIA regardless of whether one is compulsory or not, in order to minimise the environmental impacts of the project; a screening request has therefore not been submitted but there have been ongoing pre-application discussions with Camden Council.

1.2 The site

The St Giles Circus site is in a busy urban area, currently occupied by a mix of uses including offices, shops and other businesses, some residences, and cultural and civic buildings. The site itself contains a concentration of music shops and businesses, with an important music industry-related cultural history. Vehicles, people and construction activities from the adjacent site mean that the site is currently quite noisy, although the gardens around St Giles in the Fields church are quieter. Several of the buildings within the site boundary and in the surrounding area are listed or of local importance, and the whole site falls within a Conservation Area. Figure 1-1 shows the planning application boundary for the main part of the site. 71 Endell Street (not shown) is also included within the planning application.

In the north-east corner of the site, buildings have been demolished as part of the Crossrail / London Underground station construction works. The rest of the site is largely occupied by four-six storey Victorian buildings, although taller and more modern buildings surround the site to the north, including the Centre Point tower (Figure 1-2).

There are a number of other construction schemes in the surrounding area, at various stages of planning approval and construction. The development being undertaken locally means that the future environmental baseline will change; for example new sensitive receptors may be introduced to the surrounding area.

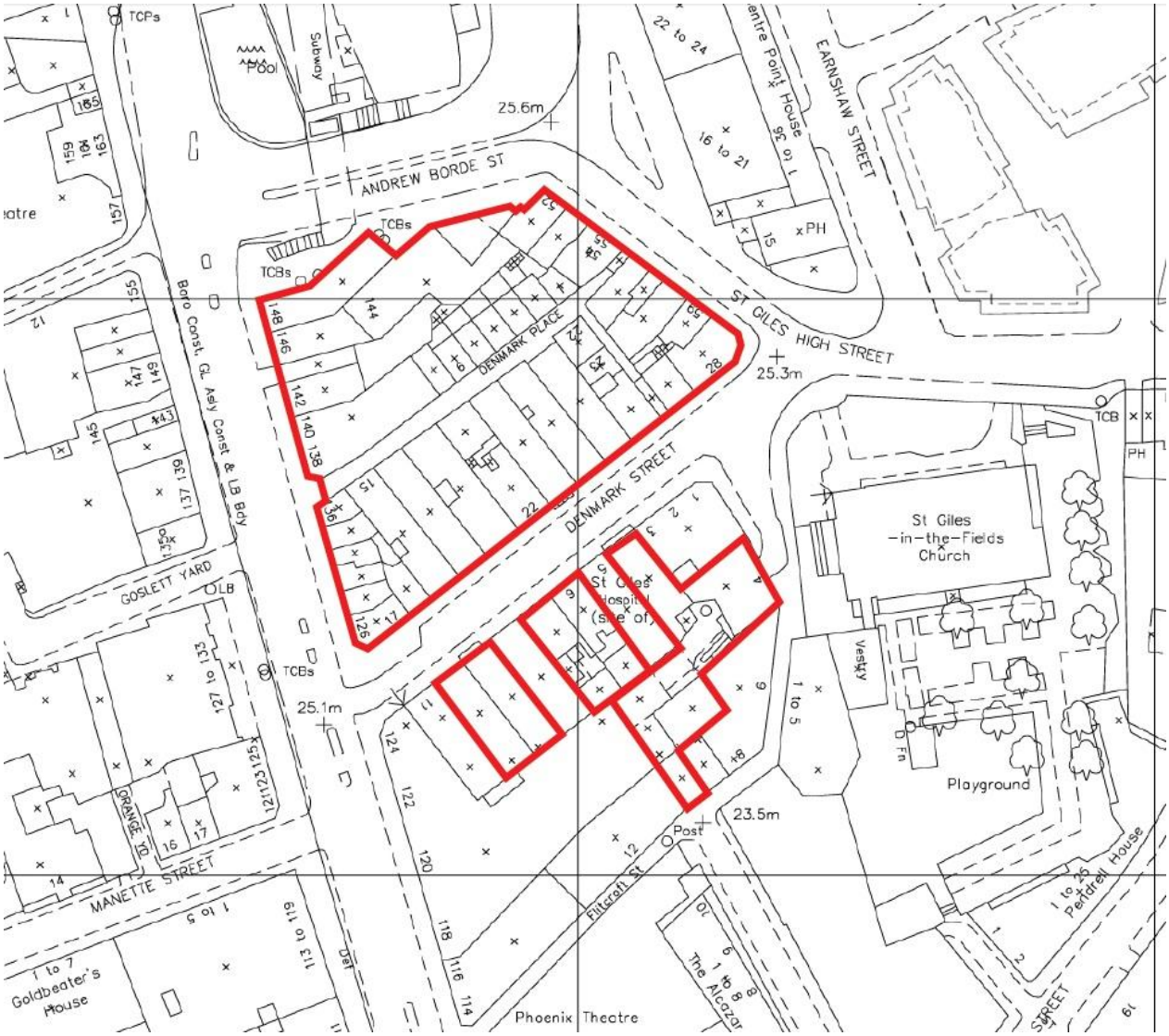

Figure 1-1 Planning application boundary (71 Endell Street not shown)

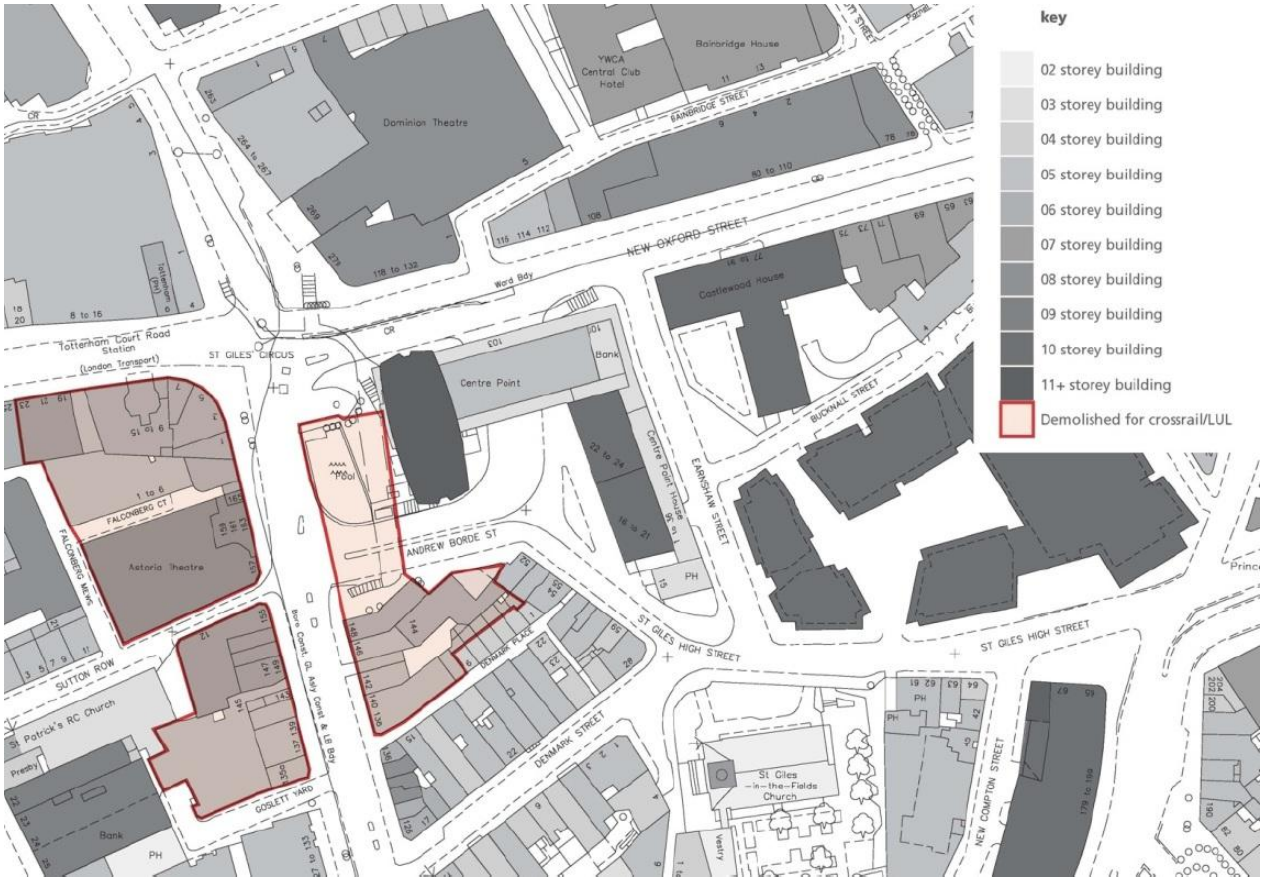

Figure 1-2 Buildings heights of site and surrounds, and buildings demolished as part of Crossrail works

1.3 The proposals

St Giles Circus is intending to be a mixed use development with a focus on culture, creativity and information. The proposals include provision of two new buildings on St Giles High Street, Andrew Borde Street and Charing Cross Road, plus two smaller buildings on Denmark Place, with routes into, through and around the site, and associated infrastructure and landscaping. The proposals include an auditorium at basement level to provide a new entertainment venue, hotel and residential properties.

Parts of the site (138-148 Charing Cross Road) have already been demolished as part of the adjacent Crossrail works, but the new scheme will include the demolition of the following, including some buildings of local importance:

- York and Clifton Mansions at 52-57 St Giles High Street
- 10 Denmark Place
- 21-25 Denmark Street (rear)
- 20 Denmark Street.

The development will comprise a mixture of new buildings and refurbishment of existing properties. The scheme design is work in progress and there may be changes to the massing (including building heights) and development schedule, therefore the figures given below are currently indicative. The new-build aspects of the proposals include the following:

- A six storey building, facing what will be a public square opposite the Crossrail entrance and onto Charing Cross Road. This will include a public atrium, with media screens at internal ground level, together with retail facing onto the atrium and onto the north side of Denmark Place. Below ground there will be an auditorium with the capacity to seat approximately 2000 people. On the upper floors, there will be a mix of uses, including visitor accommodation and retail
- A four storey building facing St Giles High Street and the public space. The basement auditorium will extend underneath this. At ground floor there will be retail use, with offices above
- A new hotel on Denmark Place to replace the demolished buildings to the rear of 21-25 Denmark Place.

On Denmark Street there will be refurbishment and conversion of existing buildings, with some extensions at roof level. Retail will remain at ground floor, with residential above. The buildings on Flitcroft Street will be refurbished to provide a club/bar/restaurant with office, retail and residential uses; and at 71 Endell Street there will be affordable housing, created by refurbishing an existing residential block.

Overall, the development is expected to comprise 11,815m^2 of commercial space and 2,975m^2 of residential, plus 500m^2 of residential at 71 Endell Street.

Other details of the scheme such as public realm, lighting, servicing and access, waste management, and renewable energy systems are subject to further design and are not currently available.

2 Potential environmental impacts

Each section below summarises what is known about the existing environmental baseline and the potential impacts upon it from the proposed development, in order to inform the scoping in or out of each topic.

2.1 The historic and architectural environment

2.1.1 Built heritage

The site lies within the Denmark Street Conservation Area and is adjacent to and within the setting of other Conservation Areas. A number of buildings within the site are Grade II listed and of special architectural or historic interest; there are also a number of buildings noted as making a positive contribution to the significance of the Conservation Area, which are considered to be heritage assets. Other listed or locally important buildings are also present locally (Archaeology

In parts of the site, the ground has been disturbed as part of the Crossrail scheme and was subject to an archaeological watching brief during works. Elsewhere on the site, where the proposals will result in ground disturbance, there is the potential for archaeological impacts. The archaeological potential of the site is greater towards the south and east, nearer to the site of a medieval church and settlement; however the depth of existing basements across the site will affect the likelihood that archaeological features have survived.

2.1.2 Townscape and visual amenity

The site is surrounded by existing taller buildings, which have the effect of screening the site so that it cannot be seen from very far away. The site does not fall within any of the Strategic Viewing Corridors, identified by the London View Management Framework, which would restrict the heights of new developments; although the view of the St Giles in the Fields Church steeple is considered to be important locally, and the site is within a Conservation Area. The proposals represent a change in townscape character and will have an effect on visual amenity by introducing new buildings to the townscape; therefore townscape and visual amenity will be assessed further within the EIA.

2.1.3 Artificial lighting

The proposed scheme includes façade lighting, external lighting, and internal screens which have the potential to spill light onto the street and have a visual impact. Construction work may also require lighting. Potentially sensitive receptors nearby include the built heritage, residents and businesses, the latter mainly during winter months when lighting will be visible during working hours.

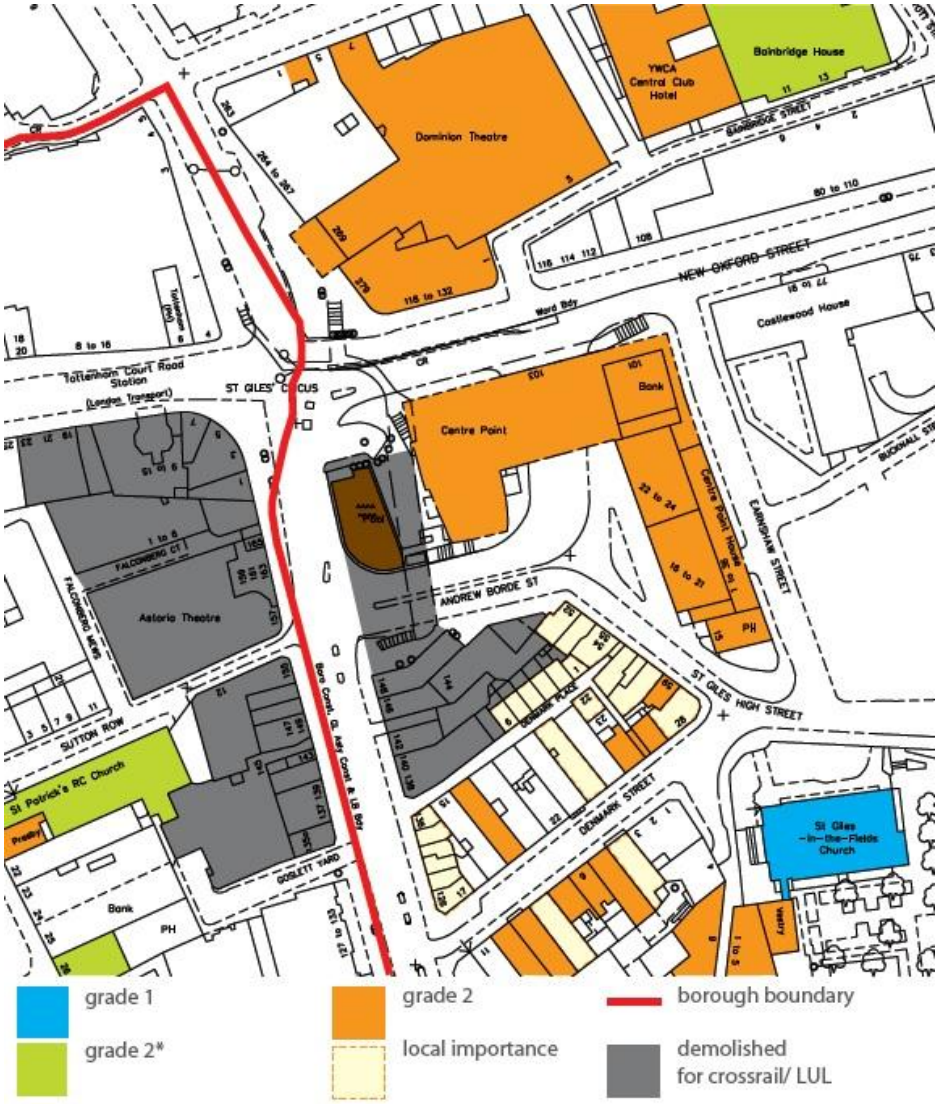

Figure 2-1) and the site is considered to comprise part of the setting of a Grade I building (St Giles in the Fields Church) and number of other Grade II listed buildings within the immediate area.

Heritage has been considered in developing the proposals and no listed buildings will be altered or removed, although some unlisted buildings of local importance will be affected and the proposals have the potential for significant impacts on the setting of other heritage assets.

2.1.4 Archaeology

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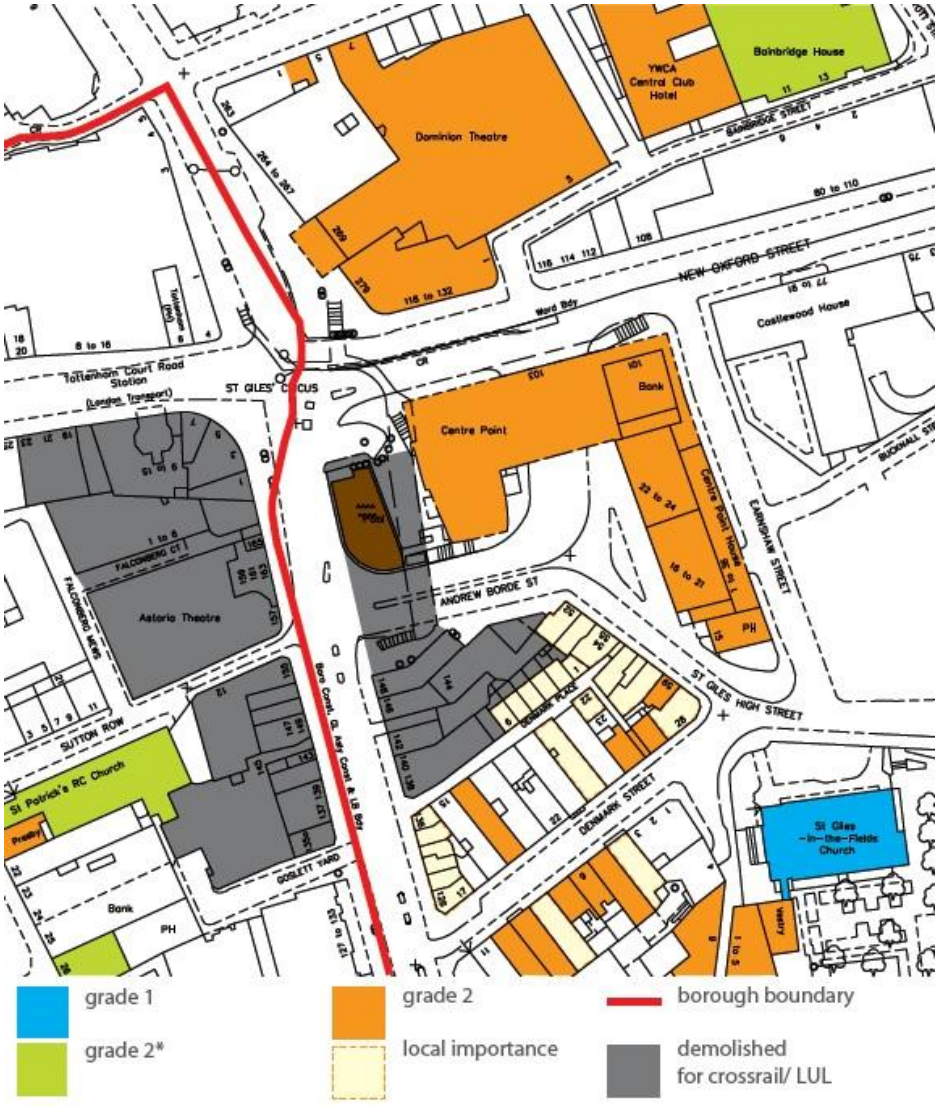

Figure 2-1 Built heritage assets at and surrounding St Giles Circus

2.2 Microclimate and health

2.2.1 Sunlight / daylight and overshadowing

The proposed buildings are not significantly taller than those existing and it is not expected that there will be a significant change in overshadowing within the site or of surrounding buildings and external spaces; or any introduction of sensitive receptors which may be affected by surrounding buildings.

2.2.2 Wind microclimate

Initial studies (Figure 2-2) support anecdotal evidence that the height and shape of the Centre Point tower causes uncomfortable wind conditions at the St Giles Circus site. Although this is an existing issue, it will be important that the proposals do not exacerbate these microclimatic effects and, if possible, mitigate them through building massing and detailing, and landscaping. Further assessment will be carried out to ensure that potentially significant impacts are minimised.

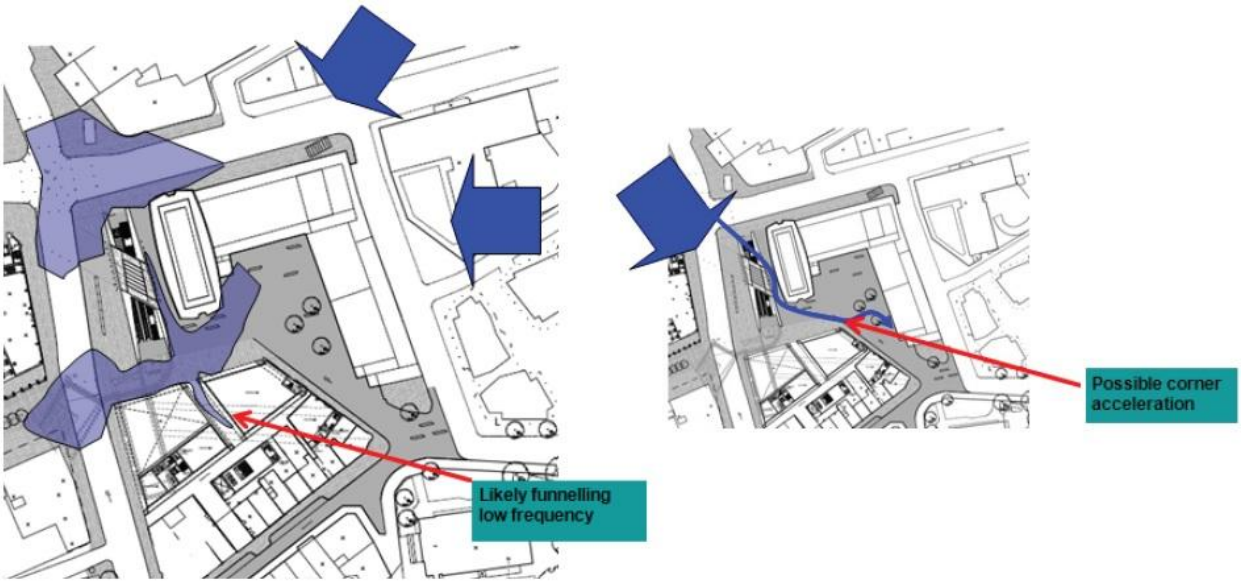

Figure 2-2 Areas with the potential for strong winds

2.2.3 Air quality

Demolition and construction works on site have the potential to generate dust, which could have a local impact if not adequately controlled. This can be controlled, as is now common practice on all major construction and infrastructure projects, through a Code of Construction Practice, to be agreed with the local authority.

During operation, it is not currently expected that the proposals will introduce a new source of air pollution to the site, or introduce a significant sensitive receptor to an area with poor air quality.. Initial calculations suggest that any increase in vehicle trips would be less than 10% over existing conditions; therefore no significant air quality impacts are expected. If subsequent studies identify the requirement for combined heat and power emissions or a greater increase in vehicle numbers, then further scoping will be carried out with Camden Council to scope in operational air quality assessment to the EIA.

2.2.4 Noise and vibration

The planned development is expected to require works including excavation, spoil removal, piling, concreting and work at high level using cranes. Construction noise and vibration is a potential nuisance for nearby businesses and residents, particularly when considered in combination with other nearby construction sites and the period of time over which these will have been active, cumulatively.

The new development will include external food and beverage service areas, which can be a local source of noise when busy. It will also introduce additional fixed plant and building services equipment associated with heating, cooling and ventilation. The events use and site servicing activities during the operational phase of St Giles Circus may cause noise impacts, although the siting of the auditorium in the basement will help to reduce noise breakout from events. The Astoria music venue was demolished on the site for the Crossrail works but would have previously have contributed to the area being relatively noisy. This, in combination with existing levels of service traffic may have made businesses and residents in the area less sensitive to noise than would be the case in a quiet neighbourhood.

The proposed development will include uses that are sensitive to noise, including hotel bedrooms. The conditions within the proposed buildings must be suitable when considered in the light of planning guidance on noise sensitive development.

2.3 Infrastructure and amenity

2.3.1 Transport and movement

As the site is located in a dense urban area and very well served by public transport (with the maximum possible 'PTAL' rating of 6b, or 'excellent'), it is anticipated that very few vehicles will need access to the development, other than for servicing, deliveries, disabled access, and during construction. Whilst the scale of the proposed development is significant, the net trip generation is expected to be modest within the local context. Logistics and transport studies are being used to inform the proposals and a full Transport Assessment will be submitted with the planning application. There is the potential for adverse impacts, primarily associated with construction traffic and from a probable increase in large servicing (for example goods, delivery and waste) vehicles, although it is expected that there will be no significant growth in traffic overall or in car trips. The pre-application consultation process and Transport Assessment Scoping have confirmed that a Construction Management Plan and Servicing Management Plan will be required to support the planning application to address these potential impacts; a Framework Travel Plan or individual Travel Plans for each land-use are also required. The EIA will, therefore, include consideration of traffic and transport impacts, with reference to the Transport Assessment and associated documents.

People movement studies are being undertaken to inform the proposals, due to the proximity to the new Tottenham Court Road station entrance, high background pedestrian flows and the potential for high number of pedestrian visitors to the site during events.

2.3.2 Waste management

Construction and demolition have the potential to generate large volumes of waste; this will be addressed through the preparation and implementation of a site waste management plan. An operational waste strategy will be developed to minimise waste generated from the proposed development and tie-in with logistics planning, but there are still expected to be significant peaks in waste generation, for example during large events.

2.3.3 Social, cultural and economic impacts

The proposed development aims to provide a venue for culture, business and leisure, bringing benefits to the surrounding area and building upon the music industry associations of the site, which form an important part of the cultural heritage of the neighbourhood.

It is anticipated that the balance of impacts of the scheme will be beneficial and therefore social, cultural and economic impacts are proposed to be scoped out of the EIA.

2.4 The natural environment

2.4.1 Ecology

An ecological site walkover was carried out on 29 February 2012. This confirmed that there are no habitats of value on site, there is no potential for protected species and the site is of negligible ecological value. The only features of interest are off-site; these are the London plane trees on the corner of Charing Cross Road and Denmark Street and the Italian alder and manna ash on Endell Street, which have landscape value and should be protected; and the gardens around St Giles in the Fields church, including Phoenix Gardens, which provides a number of small wildlife habitats. These features will not be affected directly by the proposed scheme and it is considered that any indirect impacts such as pollution or noise will be negligible. There is limited opportunity for ecological enhancement through the scheme; therefore no significant impacts on ecology are anticipated.

2.4.2 Ground conditions and contamination

Parts of the site exist on made ground, which the London Underground passes through; some existing data on ground conditions from 2008 is available from works associated with this. It is not thought that any remediation works were carried out. For areas of the site where there is no existing data, the potential for soil and water contamination and unexploded ordnance is not known and will require further assessment to understand historic uses of the site and potential sources of contamination.

2.4.3 Water resources and flood risk

Although the site is not within an area identified by the Environment Agency as being at risk of flooding from fluvial or tidal sources and the proposals will not alter the surface water infiltration rates compared with existing, there is some risk of basement flooding from surface or groundwater, particularly during construction before infrastructure has been put in place to deal with it.

3 Summary of topics scoped in and out

Based on what is currently known about the site and proposed scheme, a number of topics have been scoped out of further assessment due to the lack of potential for significant impacts. Where there is the potential, or not enough is currently known to make a judgement, the topic has been scoped in. Table 3-1 summarises this.

Table 3-1 Summary of topics scoped into and out of further assessment

Topic	Scoped in?		Reason
	Construction	Operation	
Townscape and visual impact	✓	✓	Important urban location seen by many
Noise and vibration	✓	✓	Construction and events noise
Archaeology	✓	*x*	Ground works may disturb archaeological features
Built heritage	✓	✓	Many heritage assets; changes to setting
Social, cultural and economic impacts	*x*	*x*	Beneficial impacts anticipated
Transport and movement	✓	✓	Servicing vehicles and high pedestrian flows
Air quality	*x*	*x*	Code of Construction Practice to be agreed
Waste management	✓	✓	Lots of waste during construction and events
Artificial lighting	✓	✓	External lighting and light spill from screens
Wind microclimate	*x*	✓	Opportunities to mitigate existing problems
Ecology	*x*	*x*	Site of negligible ecological value
Ground conditions and contamination	✓	✓	Potential for contamination not fully understood
Sunlight / daylight and overshadowing	*x*	*x*	No significant change over existing
Water resources and flood risk	✓	✓	Risk of basement flooding

4 Proposed assessment methodology

4.1 EIA general approach

Specialists with relevant professional expertise and experience will carry out the assessment of each topic included in the scope of the EIA. The specialists will be responsible for ensuring that the methods they use are appropriate, reflect good practice and can be defended within the consent process. The assessment process for each topic should adopt the same systematic, comprehensive process comprising the following steps:

- Definition of the works to be assessed
- Identification and scoping of issues
- Consultation with relevant parties to identify key concerns and to obtain data
- Collection of any required baseline environmental data by research and survey
- Re-evaluation of appropriateness and limitations of assessment methodology
- Identification of resources and receptors
- Prediction of impacts (and robustness of these predictions)
- Cumulative impact assessment with other committed developments in the area
- Evaluation of significance
- Identification of mitigation
- Evaluation of residual effects or risks
- Any requirement for future monitoring.

4.1.1 Proposed consultees

The process of undertaking consultation assists in identifying the likely environmental and other effects of the proposed development, enabling the refinement of the designs to incorporate mitigation measures to limit adverse impacts and enhance the positive effects of the proposals. The following is a list of the organisations and bodies that are likely to be approached as part of the consultation process in the preparation of the Environmental Statement:

- London Borough of Camden,
    - Planning Officer
    - Environmental Health Officer
    - Heritage Officer
    - Highways Department
    - Waste Division
- English Heritage.

In addition, other consultees may be identified during the process. Responses from any of these parties will be considered with respect to the planning application and their views incorporated into the Environmental Statement where appropriate.

4.1.2 Other committed developments for cumulative impact assessment

The list of schemes with planning permission to be considered within the cumulative impact assessment will be determined through liaison with Camden and Westminster Councils.

4.2 Built heritage

Heritage assets of architectural, historic and/or artistic interest within the assessment site and its immediate surrounding area will be identified by consulting existing records and archives. These will include the Greater London Historic Environment Record, the National Heritage List for England and any other relevant local archives. Site survey and analysis will supplement desk-based research. In describing the built heritage baseline, the significance of heritage assets will be assessed, including the contribution that their setting(s) make to that significance. In doing so, reference will be made to the following documents, where appropriate:

- *PPS5 Planning for the Historic Environment* (2010)
- *PPS5 Practice Guide* (2010)
- Department of Culture, Media & Sport's *Principles for the Selection of Listed Buildings* (2010)
- Relevant English Heritage *Selection Guides*
- English Heritage's *Conservation Principles, Polices and Guidance* (2008)
- English Heritage's *The Setting of Heritage Assets* (2011).

Assessment of the value of identified heritage assets and the potential magnitude of effects of the proposed development during construction and operation will be carried out following best practice and with reference to heritage and conservation planning guidance. Best practice assessment methods are considered to include the broad guidelines in *Design Manual for Roads and Bridges HA 208/07: Cultural Heritage Advice Note* and English Heritage's *Seeing History in the View*.

A heritage statement, in line with PPS5 will be appended to the Environmental Statement chapter, which will include the statements of significance for each heritage asset. Where necessary, the assessment chapter will cross-reference to the archaeology and townscape & visual amenity chapters.

4.3 Archaeology

The significance of the site in terms of archaeology will be determined through desk study and consultation, using resources such as Greater London Sites and Monuments Record and other historic records, and by reviewing any previous surveys for the site, for example those from the Crossrail studies. The potential for archaeological features to be present within the site area will also be informed by building survey information, which will be used to profile the existing buildings and their basement depths, and by an analysis of current and former activities on site, which may have reduced the archaeological potential.

An assessment of the likelihood of impacts relating to the development will be made; the significance of any potential impacts will be based upon the value of the feature and the potential scale of any impact. Where necessary, the scope of any further programme of investigation required as mitigation will be provided. As below ground archaeology is closely related to heritage assets above ground and the historic townscape, the impact assessment process will involve close collaboration with other consultants on the EIA team. In addition, opportunities for gathering information during other ground investigations (for example geotechnical) will be explored.

4.4 Townscape and visual amenity

To establish the existing baseline and inform the assessment of potential impacts, the zone of theoretical visibility will be discussed with Camden Council early on in the process; in particular, the agreement of representative viewpoints, relative to various identified receptors. The proposals will be assessed in terms of their effect on existing townscape elements, character and visual amenity; with reference to the built heritage assessment, where appropriate. Mitigation methods for avoidance, reduction and remediation of adverse potential impacts will then be identified if required. The townscape and visual impact assessment will be based on the methodology set out in the following documents:

- Landscape Institute and Institute of Environmental Management and Assessment's *Guidelines for Landscape and Visual Impact Assessment, Second Edition* (2002)
- The former Countryside Agency's *Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity* (2004)

It will also take into consideration the emerging changes to the *Guidelines for Landscape and Visual Impact Assessment*, which the Landscape Institute is currently consulting on, and the guidance set out in English Heritage's *Seeing the History in the View* (2011).

The assessment will include:

- A desk-based review of relevant national and local planning documents
- A desk-based study to establish the physical components of the local townscape and to identify the boundaries to the assessment study area. Ordnance Survey maps and digital data will be utilised to identify local features relating to form, topography, public realm and use
- Site visits will be undertaken to verify the desk based assessment, to record the surrounding building heights and to assess the townscape character, quality and value of the site and the surrounding area
- Reference will be made to any available local townscape assessments
- Views into the sites from the surrounding area will be assessed and a zone of theoretical visibility verified and plotted on to an ordnance survey base plan. Photographs will be included to illustrate key viewpoints and the locations will be agreed with relevant authorities.

4.5 Artificial lighting

The lighting baseline conditions and any existing lighting issues will be identified through evening site visit, photo survey and light meter readings of existing lighting on and adjacent to the site. The assessment will identify and describe sensitive receptors in or surrounding the site with the potential to be affected by the development proposals and assess the potential impacts which the proposed lighting scheme may have on adjacent receptors. The Institute of Lighting Engineers' *Guidance notes for the reduction of obtrusive light*, which describe appropriate lighting levels for different types of environment, will be used in the assessment of impact significance and to guide any design required for mitigation. This document contains the criteria that the artificial lighting scheme will be assessment against to establish whether the overall scheme is deemed 'compliant' with regards to light spill/sky glow, light trespass (into adjacent receptor windows), light source intensity and luminance (visual brightness).

4.6 Wind microclimate

Due to the relatively small scale of the proposed development, it is proposed to undertake a desktop assessment which will build upon the work already undertaken and comprise the following:

- Wind frequency analysis of the closest and most suitable wind data provided by Met Office;
- Qualitative assessment of the baseline conditions of the site, using available topographical data from local sources;
- Qualitative assessment of the wind conditions resulting from the construction of the proposed development. Description of wind conditions in relation to the well established Lawson Comfort Criteria;
- Assessment of the significance of impact through comparison of the base line condition and proposed development and objectives; and
- Where necessary the identification of any mitigation measures.

4.7 Noise and vibration

The environmental noise and vibration technical assessment will incorporate the following:

- Baseline noise and vibration survey (including both day and night-time measurements) to identify existing sources of noise and vibration with the potential to affect the sensitive parts of the development, as well as sources potentially affecting existing residences and other sensitive receptors. All measurements would be carried out in accordance with relevant British Standards including BS 7445 *Description and measurement of environmental noise* and BS 7385 *Evaluation and Measurement for Vibration in Buildings*.
- Noise and vibration impacts from construction will be assessed with reference to BS5228: 2009 *Code of practice for noise and vibration control on construction and open sites,* pts 1 and 2.
- Assessment of the suitability in noise terms of the development site to the land uses proposed will be made with reference to PPG 24 *Planning and Noise*, the London Borough of Camden *Core Strategy* and other planning policies relevant to the St Giles Circus and Denmark Place area.

4.8 Transport and movement

A number of separate but related studies are being undertaken to inform the proposals, including trip forecasting, servicing and vehicle logistics studies, and people flow analysis. These will be drawn together and assessed in terms of their significance as part of the Transport Assessment process and reported in the transport and movement EIA chapter.

The following will be carried out as part of design development of the proposals and the subsequent Transport Assessment and EIA processes, as set out in the Transport Assessment Scoping Report, approved by the London Borough of Camden:

- Establish site context and existing baseline conditions
- Evaluate potential growth/change in transport demand/conditions including public transport improvements and cumulative/committed developments
- Assess travel/trip generation forecasts associated with proposed development and potential impact on transport network/operations
- Assess potential impact of proposals of operation of development including issues such as car and cycle parking, servicing and pedestrian comfort.
- Identification of potential mitigation measures and residual impacts where applicable.

4.9 Waste management

A Site Waste Management Plan and operational waste strategy are being prepared for the development, alongside the logistics strategy. The predicted waste generation rates in these will form the basis of the scheme assessed within the waste management chapter. The EIA will assess the impacts of the proposals on waste infrastructure and include:

- A description of the existing baseline condition with regard to waste generation and waste infrastructure.
- Prediction of the likely volumes and types of waste which will be generated by the development during both construction and operational phases of the proposed development. From these predictions impacts on waste management infrastructure will be identified and assessed
- Recommendations of measures to mitigate significant adverse impacts including liaison with the design team to 'design out' waste generation as much as practical. Recommendations for mitigation measures will also be included where impacts cannot be removed by design. All mitigation measures will be incorporated into the site waste management plan and operational waste strategy.

4.10 Ground conditions and contamination

The existing ground conditions at the site will be determined through a desk based site appraisal. This will include a review of historical maps to determine land use history, review of any existing site investigation reports, site walkover survey to confirm current use, identification of surrounding land uses, review of published geological and hydrogeological maps (British Geological Survey) and review of information from the Environment Agency and any other existing survey data.

An initial conceptual site model and a preliminary risk assessment will be prepared to understand the site context, in general accordance with Environment Agency Model Procedures for the Management of Land Contamination. The assessment will also determine the need for and scope of any site investigation necessary to supplement any gaps in information. A ground investigation and generic quantitative risk assessment may be deemed required if the results of the preliminary risk assessment indicate these elements are required.

4.11 Water resources and flood risk

A study is being undertaken to identify the risks of basement flooding; this will be reported within a Flood Risk Assessment. The Environmental Statement will therefore report on the findings of this process and describe the impact significance in EIA terms.

5 Planning documents

5.1 Proposed Environmental Statement structure

A preliminary list of contents required for an Environmental Statement is suggested below, based on the issues identified in this scoping document and with regard to the requirements of legislation.

Non-technical summary: This would provide a balanced account of the key information in the Environmental Statement in non-technical language. The non-technical summary would be produced as a stand-alone document in a format suitable for public dissemination.

Main Environmental Statement document: This document and its associated appendices would contain the full technical assessment of construction and operational effects. The format for the Environmental Statement is likely to follow a structure close to that listed below:

- Introduction
  - Background to the scheme
  - Site description
  - Planning context
  - The Environmental Impact Assessment team
- Methodology
  - Scoping
  - Summary of EIA process
  - Cumulative and interactive impacts
  - Relationship to other documents submitted with the planning application
- Development description
  - Development objectives
  - The proposals
  - Programme
- Alternatives and design evolution
  - The ‘do nothing’ alternative
  - Alternative sites
  - Alternative schemes
  - Design evolution
- Technical chapters

- Cumulative and interactive impacts
- Residual impacts and conclusions
    - Residual impacts
    - Summary of mitigation measures
    - Conclusions

Any technical supporting information would be included as appendices to the main report.

5.2 Other planning documents

A number of documents will be submitted as part of the full planning application, which relate topics covered in the EIA. These are summarised below.

5.2.1 Sustainability statement

This assesses the scheme against sustainability indicators, based on BREEAM and planning policies priorities. The statement is the output of a process which will include specific strategies for energy, water and waste; the scheme is also seeking accreditation under BREEAM (bespoke, for new build) and Eco-Homes (for residential refurbishment).

5.2.1.1 Transport statement

As described in sections 2.3.1 and 4.8 above, a Transport Assessment will be carried out for the scheme, which will incorporate pedestrian flow and logistics studies. This will be a standalone document, referred to within the Environmental Statement.

5.2.1.2 Flood risk assessment

The flood risk assessment will carried out for the whole site, in line with PPS25.

5.2.1.3 Sunlight / daylight statement

Although no significant impacts are anticipated relating to sunlight / daylight, a report will be submitted with illustrates the effects of the scheme, with reference to BRE guidelines. This is in accordance with Camden planning policy.

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