

Scoping Report
North East Quadrant
Regent’s Place

British Land Company

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I.0 INTRODUCTION

I.1 BACKGROUND TO THE REPORT

This Scoping Report has been commissioned by the British Land Company in relation to their development proposals for the North East Quadrant at Regent’s Place.

This report provides an overview of the environmental effects potentially associated with the proposals, indicates those issues which are likely to be important, and whether these impacts will be adverse or beneficial. In addition, this report identifies areas where further research work is necessary, and, where applicable, the methodology which is proposed for the assessment of impacts.

The scoping report provides the basis for completion of the full Environmental Impact Assessment (EIA) of the proposals.

I.2 THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

Environmental Assessment (EA) was formally introduced into the UK planning system by the Town and Country Planning (Assessment of Environmental Effects) Regulations 1988, as amended. These Regulations implemented the requirements of Council Directive No. 85/337/EC, which was subsequently amended by Council Directive No. 97/11/EC. This, in turn, was implemented in the UK by the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (SI 1999/293) (The EIA Regulations).

The main activities in the EIA process may be summarised as follows:

- definition of the projects to be assessed;
- description of the “baseline” environment (i.e the conditions likely to prevail at the commencement of the project);
- definition of the scope of the assessment;

- consultation with interested parties;
- prediction of the likely effects of the project;
- evaluation of these effects in terms of their potential significance; and
- description of the nature and effectiveness of measures which could be adopted in order to mitigate significant adverse effects.

The EIA process results in the preparation of a written Environmental Statement (ES), which is submitted in support of planning applications for projects of certain types and scale, as defined in the EIA Regulations.

Guidance on the EIA procedure and on the preparation of Environmental Statements is available from a number of sources. Relevant advice is contained in Department of the Environment (1995), “Preparation of Environmental Statements for Planning Projects that require Environmental Assessment – A Good Practice Guide”, in DETR Circular 02/99 “Environmental Impact Assessment” and, more recently in Office of Deputy Prime Minister (July 2002), “Note on Environmental Impact Assessment Directive for Local Planning Authorities 1999 EIA Regulations”.

The EIA Regulations, as well as the other sources mentioned above, identify a ‘scoping’ stage in the EIA process. This is briefly described in Section 1.3 below.

I.3 THE ROLE OF SCOPING

Scoping is a preliminary environmental appraisal that allows the coverage and level of detail of the EIA to be defined.

Among the procedural changes brought about by the EIA Regulations 1999 is the possibility for developers to obtain a formal (scoping) opinion from the relevant planning authority on what should be included in the Environmental Statement (ES) (Regulations 10). The authority is required to take a decision on the basis of:

- (a) the specific characteristics of the particular development;

- (b) the specific characteristics of development of the type concerned; and
- (c) the environmental features likely to be affected by the development.

However, formal scoping can also be carried out by or on behalf of the developer as part of the overall EIA process, in order to highlight the key environmental issues, and allow an efficient allocation of time and resources.

The primary objective of scoping is to provide a framework for the identification and evaluation of significant effects. In so doing, the first task is to distinguish between those issues and/or locations likely to be associated with significant effects, and those that are highly unlikely to be. The latter may then be “scoped out” of the assessment, although in the event of any changes in information available, they may be reintroduced in the scope of the assessment.

Moreover, a scoping report can serve as a basis for consultation with the local authority and interest groups, in order to reduce controversy in the later stages of the planning decision process. Scoping could also be useful in avoiding the submission of irrelevant information, focusing the attention on the important environmental impacts of the proposal.

Under the EIA Regulations 1999¹, an outline of the alternatives considered by the developer and the reasons for his choice have to be included in the ES. The recent EU guidance on scoping² points out that scoping should also outline the alternatives to the project, which will have to be addressed in the full ES.

The scoping exercise may also serve to identify methodology to be used for further data collection (i.e. details of surveys) or for the prediction of significance.

¹ Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (SI 1999/293) (The EIA Regulations).
² Environmental Resource Management (2001) *Guidance on EIA – Scoping*. Issued June 2001 on the Directorate General for Environment of the European Commission website: <http://europa.eu.int/comm/environment/eia/eia-support.htm>.

I.4 APPROACH TO THE SCOPING PROCESS

This scoping exercise has followed the three-step approach, which is the basis of the overall EIA process:

- preliminary collection of information on the site (i.e. definition of the baseline);
- qualitative impact predictions; and
- evaluation of importance.

The scoping phase differs from the overall Impact Assessment in that it is a preliminary evaluation of the type of impacts and their magnitude, which in many cases will have to be confirmed by further research. The duration of scoping is limited, in that it has to highlight the main issues on which the following EIA will have to concentrate, but it is not intended to substitute the overall process.

In the present case the scoping exercise was based on consultation with local authorities, and was complemented by the results of a site visit and a desktop study.

The desktop study was based on the following information resources:

- London Borough of Camden Unitary Development Plan (UDP), adopted in March 2000;
- London Borough of Camden website (<http://www.camden.gov.uk>);
- English Heritage information on conservation areas and listed buildings for historic value;
- Sitescope database (<http://www.sitescope.co.uk>);
- The UK National Air Quality Information Archive (<http://www.aeat.co.uk/netcen/airqual/>);
- The Museum of London Archaeological Service database of archaeological sites in London (<http://www.molas.org.uk/public.html>);

- The Ecology Handbook 'Nature Conservation in Camden' published by the London Ecology Unit in 1993.

Information has also been provided by M3 Consulting and by members of the development team, namely Wilkinson Eyre and Munkenbeck & Marshall.

1.5 STRUCTURE OF THE REPORT

This scoping report is organised in four Sections.

Section 1 provides an introduction to the regulatory framework relevant to the EIA process in general and the scoping phase in particular. The Section outlines the approach followed in this report, and describes the sources of information used and the objectives of the scoping exercise.

Section 2 provides a brief description of the development proposals and outlines the approach to the consideration of alternatives that is proposed for the EIA process.

Section 3 contains a qualitative discussion of the potential importance of individual environmental impacts of the development, as well as an indication of the areas that at this stage seem to require further research. Where applicable, the methodology to be followed in the subsequent stage of the assessment (i.e. the full EIA) is briefly described.

Section 4 uses the results of the previous section to 'rank' the impacts by importance and summarises the key results of the scoping exercise.

2.0 THE PROPOSED DEVELOPMENT

2.1 DESCRIPTION OF THE DEVELOPMENT

The proposed development consists of the construction of a mixed-use development on the North East Quadrant (NEQ) site at Regent's Place, London, NW1. The site comprises 1.0 hectare of land at Ordnance Grid Reference TQ 291 824 and is bounded by Euston Tower to the south, Drummond Street to the north, Triton Square to the west and Hampstead Road to the east. The site application boundary plan is shown in Figure 1.

Although the details of the design proposal are currently under development, information on the scale and the allocation of floorspace is available. The scheme will involve construction of a mixed-use development, comprising commercial and residential uses with ancillary retail and community uses. It is envisaged that the development would consist of two new buildings, the tallest rising to 25 storeys in height providing a total of approximately 45,000m² of office (Class B1) floorspace, 4,000m² of retail, restaurant and community use (Class A1/A2/A3/A4/A5/D1) and 27,500m² of residential (Class C3), including affordable and split market accommodation.

The proposals for the NEQ site form part of the overall Master Plan for the phased development of Regent's Place. Two new buildings, the 18,500m² headquarters office building for Abbey National plc at 2/3 Triton Square and the 350 Euston Road building with 12,000m² of office and retail accommodation are complete. A mixed use commercial and residential development for the Osnaburgh Street site, which also forms part of the Regent's Place Masterplan comprising approximately 1.5 hectares of land has recently been submitted to LBC for planning application.

2.2 ALTERNATIVES TO THE DEVELOPMENT

Under the EIA Regulations 1999, an outline of the alternatives considered by the developer and the reasons for their choice should be included in the ES.

The demand and justification for the development as well as the consideration of alternatives to the proposals, will be discussed in the ES at different levels:

- at a **strategic** level of evaluating the absolute demand for modern office accommodation in London, as one of the three major financial centres of the world for development of this type, and policy for London as a World City;
- in terms of **location**, assessing the constraints and opportunities for such potential development in relation to mixed-use policy, affordable housing objectives, building heights, visual impact and protected views in London as a whole (taking account *inter alia* of the London Plan, RPG3A and the London View Management Framework draft SPG, transport infrastructure, and other relevant environmental factors); and
- the alternatives for the proposed **design** will be discussed, in relation to their technical and environmental implications.

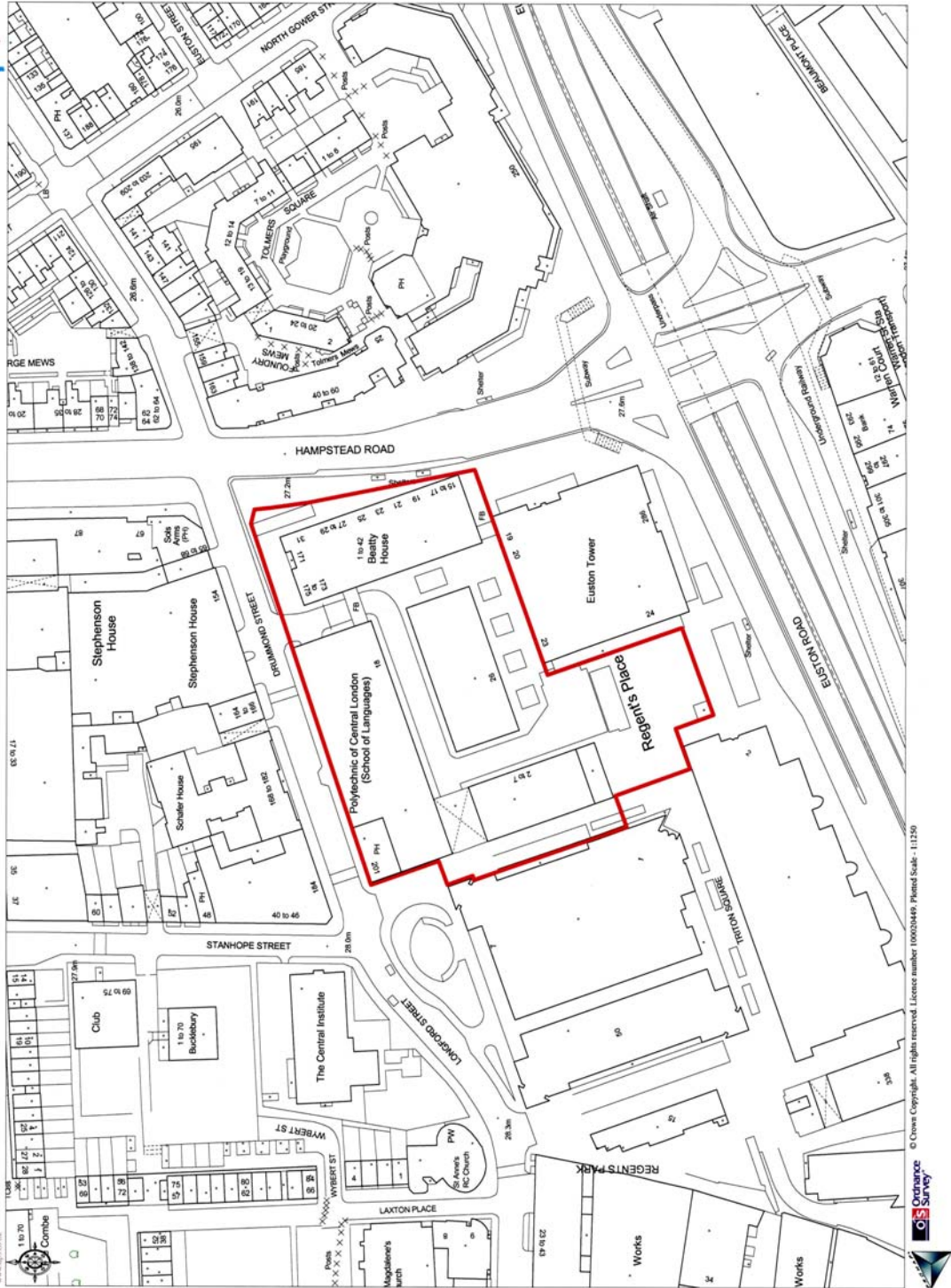


Figure 1: Site Application Boundary Plan

3.0 THE POTENTIAL ENVIRONMENTAL IMPACTS

Under each section topic, a summary of the content of the section, the methodology and scope of assessment is given. Where relevant, the assumptions of the assessment are described. Current relevant legislation or recognised guidance for individual assessments will be adhered to, where necessary.

3.1 LAND USE AND PLANNING POLICIES

The assessment of impacts of the development on land use will have to refer to the Local, Regional and National planning framework.

The site is located within the London Borough of Camden (LBC), thus at the local level the reference document is the LBC Unitary Development Plan (UDP) adopted in March 2000. In addition reference will also be made to the Mayor's London Plan (approved February 2004).

The scope of assessment will focus predominantly on the suitability of the proposed land uses in relation to the designations of the land under the UDP, objectives under national Planning Policy Guidance (PPG) and the emerging Planning Policy Statements (PPS), Regional Planning Guidance (RPG) and the London Plan.

As far as the UDP designations are concerned, the site is not located within any conservation areas. Regent's Park conservation area lies to the west of the site, Bloomsbury conservation area to the south and east, and Charlotte Street conservation area further to the south-east. In addition, the site lies within an Area of Archaeological Priority (Policy EN 41). The site is within a Central London Area, which encourages mixed-use development.

Elements of compliance or contrast of the proposals with the planning framework will be analysed in the EIA process.

3.2 VISUAL AND TOWNSCAPE IMPACTS

The site falls within the Viewing Corridor and Wider Consultation Area for Strategic View 4 (Parliament Hill to the Palace of Westminster) (EN43, 44, 45), as well as the Background Consultation Area for St Paul's Cathedral. In addition, it is located nearby Regent's Park and Bloomsbury conservation areas and several listed buildings.

A series of view studies will be carried out to demonstrate the impact of the development on the neighbouring conservation areas, listed buildings, Royal Parks (particularly Regent's Park) and RPG3A strategic views, as well as relevant views within the recent draft SPG London View Management Framework.

Important considerations in relation to views and townscape will include views from, amongst others:

- Parliament Hill;
- Primrose Hill;
- Wolfe Memorial over the Maritime Greenwich World Heritage site;
- the various views set out in the Camden UDP. This would need to include consideration of visibility from the nearest Conservation Areas at Regent's Park and Bloomsbury and on public areas, such as Regent's Park and Hyde Park. Visibility and impact on the setting of listed buildings will also be considered.

A full list of viewpoints that will be assessed is provided in the table at Appendix I.

One of the proposed buildings will be of substantial height. Therefore, the visual impact on the Strategic View for Palace of Westminster needs to be carefully considered.

The current visual setting and character of the site and surrounds will be described. In particular, the impact of the proposals on the character of surrounding conservation areas and on the setting of listed buildings in the general vicinity of the site will be taken into account. A number of photomontages/perspectives of the proposed development will be produced by Cityscape to support the analysis.

3.3 ARCHAEOLOGICAL IMPACTS AND HERITAGE

The development site is located within an Area of Archaeological Priority, as designated by the LBC UDP. A preliminary search of the Museum of London Catalogue of London Archaeological sites³ provides information on archaeological sites in the proximity of the site. Post medieval and 18th-19th century deposits were reported in the vicinity of the site, which suggests that some significant archaeological features or deposits may be present at the site.

Due to this and the archaeological designation of the area, the archaeological potential of the site will be assessed by a desktop-study following guidance given by Institute of Field Archaeologists (1994). This will be undertaken by the Museum of London Archaeological Service (MoLAS).

The significance of the resource will be assessed in the context of PPG16, English Heritage guidance and the LBC UDP. The impact of the proposed development will be assessed in terms of proposed site design. Greater London Archaeological Advisory Service (GLAAS) has requested substantial information on “standing archaeology” in Camden in the past, including information on unlisted structures to be demolished.

The results of the desk-based assessment will enable an informed decision to be made upon whether further archaeological safeguards are necessary. If mitigation measures are necessary, they will be proposed in accordance with the requirements of English Heritage.

3.4 TRAFFIC/TRANSPORT

The site is highly accessible by public transport, being located close to the Bakerloo, Hammersmith and City, Circle, Metropolitan, Northern and Victoria lines, and within walking distance of the National Rail at Euston train station and a number of local bus routes along Euston and Hampstead Roads. Arup will undertake a thorough Transport Assessment, which will include an appraisal of the Public Transport Accessibility Level. The baseline transport assessment will involve an appraisal of committed developments in the area to assess the cumulative impact.

³ website: www.molas.org.uk/public.html visited 27th May 2003.

In the light of the current national and regional planning framework, access to the site by non-car based forms of transport will be encouraged, and a Green Travel Plan will be developed.

Whilst it is envisaged that the impact on road traffic of the proposal will be insignificant in terms of its indirect environmental and social implications, mitigation measures are under consideration (including a Green Travel Plan) and these will have to be discussed in the ES in line with best practice elsewhere at Regent's Place. The number of trips generated by the site will be assessed in the context of the existing public transport provision and capacity. Gross/net trips will be subdivided into the following transport modes:

- Pedestrians
- Cyclists
- Buses
- London Underground
- Overground rail
- Highways

Indirect effects of road traffic such as noise and emissions to air will be evaluated should the proposals result in an increase in road traffic flows.

3.5 AIR QUALITY

Given the location of the proposed development, the baseline air pollution levels will be typical of urban areas.

Existing air quality around the site is to be assessed using data from nearby Local Authority monitoring stations, and Camden's Review and Assessment of Air Quality Stage III and IV reports, and Camden's 2002 Air Quality Annual Review. Estimates of air quality background levels for Marylebone Road will be obtained from the Environmental Research Group of Kings College London (ERG-KCL), which is based on data from the DETR network of air quality monitoring sites.

Under Part IV of the Environment Act 1995 Local Authorities are required to periodically review air quality within their areas and to assess whether any of the air quality objectives prescribed in the regulations are not likely to be met by the specified date. To date the

London Borough of Camden has completed stages I, II, III and IV of the assessment and review process. The conclusions of the stage III report are that areas of exceedence are predicted to arise in 2004/5 for nitrogen dioxide and PM₁₀. The stage IV report concluded that nitrogen dioxide concentrations were predicted to be higher than shown in the Stage III work and levels in most parts of Camden would not meet the air quality targets. In September 2002, Camden declared the whole Borough an Air Quality Management Area (AQMA) and produced an Air Quality Action Plan detailing initiatives to reduce pollutant concentrations. As most of the air pollution in London is caused by road traffic, the action plan mainly includes measures to reduce pollution from road vehicles and to reduce the volume of traffic.

The proposed development in itself is not of a type that would be expected to give rise to significant air quality impacts, once completed. Adverse effects will mainly result from construction works, due to dust emissions from construction site activities, storage areas and lorries. Construction traffic will also result in additional vehicle emissions.

However, the potential for emissions to air from the site activities will have to be evaluated. Following completion of the traffic assessment, the impact of additional traffic generated by the proposal will also have to be assessed.

The significance of any changes in air quality will have to be assessed during the course of the EIA at the following sensitive receptors:

- office workers at the site or using its facilities;
- local residents and users of community facilities;
- amenity areas;
- air quality in local and strategic terms; and
- the residential properties in the proximity of the development that may be affected by changes in road traffic flows. The latter may be scoped out of the assessment following completion of the traffic assessment, should changes in traffic flows be considered insignificant.

The assessment of significance of future air quality will refer to Camden's Air Quality Action Plan, the National Air Quality Strategy and GLA's Air Quality Strategy at residential properties in the proximity of the development.

Mitigation measures to reduce the impact of construction dust on air quality will also be addressed.

3.6 NOISE AND VIBRATION

The noise assessment will focus on:

- existing noise climate, the main noise source is likely to be road traffic noise from surrounding streets;
- potential impacts of construction noise;
- potential impacts of any changes in road traffic associated with the proposal;
- other sources of operational noise (e.g. plant noise, wind effects and façade reflection effects); and
- noise assessment of the site in relation to PPG24, i.e. residential development close to road noise sources.

Sensitive receptors at this stage have been identified as follows:

- people in public places;
- residential properties;
- activities in community facilities such as educational (e.g. schools) and religious institutions;
- activities in commercial buildings (e.g. offices);
- fabric of listed and potentially vulnerable structures; and
- conservation areas.

A baseline noise survey will be carried out by ENVIRON to assess the existing noise environment at the site boundary and at sensitive receptors in the vicinity of the proposed development. The assessment will be based upon providing sufficient information for the following:

- Construction phase noise predictions, based on BS 5228 Parts I and IV, which will concentrate on site preparation, demolition and works for foundations (piling, pile cap breaking, concrete pours for the basement etc.).
- Operational noise assessment, which will use the survey data to set out appropriate emission limits for plant included in the development, based on the approach in BS 4142.
- Traffic noise assessment, which will use traffic flow predictions to model noise levels using the methods set out in the Calculation of Road Traffic Noise 1988 and criteria set out in the Design Manual for Roads and Bridges Volume II.
- A PPG24 assessment to show that industrial and transport related background noise levels are compatible with the redevelopment of the site for residential uses.

To meet these requirements, a background noise survey, covering the daytime, evening and night (the latter is required for setting of target levels for ventilation and other plant and the PPG24 assessment) will be undertaken at different locations within and surrounding the site. The data collection exercise will follow the recommendations of the Draft guidance of the Institute of Acoustics and Institute of Environmental Management and Assessment (IEMA) of March 2003.

Camden also monitors noise levels on Euston Road and has a long time series of data from 1998. The long-term series are L_{A90} , but from 2000 include L_{Aeq} data.

Noise predictions will estimate future noise levels at the identified sensitive receptors. Traffic noise will be predicted by the application of the Control of Traffic Noise (CRTN)⁴ methodology, while construction noise predictions will follow the BS 5228⁵ methodology. Impacts of operational noise will be predicted based on:

- construction and post-development traffic flows (peak and 18 hour flows);

⁴ DoT and Welsh Office (1988) *Calculation of Road Traffic Noise*. HMSO, London.

- construction method statement and programme; and
- proposed development plant specification.

Predicted levels will then be referred to the existing levels as monitored during the baseline survey and impacts on sensitive receptors will be assessed using Camden noise criteria for daytime, night-time and weekends. The assessment of significance of predicted changes in the noise environment will be based on relevant guidelines (World Health Organisation Guidelines on Community Noise⁶, PPG 24⁷, BS8233/4142⁸, DMRB⁹ and the CRTN) and the results of the baseline survey.

The Camden Noise Strategy (2002) will also form a key part of the framework for evaluation of effects.

3.7 MICROCLIMATE

Changes in wind patterns, sunlight and daylight availability and temperature can be caused by developments, particularly when their height or massing is substantial. Given the scale of the proposal, its close proximity to Euston Tower (a building known for its wind problems) and the buildings of Regent's Place, and the windy nature of the surrounding area, it is anticipated that these effects will require detailed assessment.

Wind tunnel modelling will be carried out by Arup Wind in relation to the massing of the proposed development. In addition, baseline data for Holborn will also be incorporated. The acceptability of windy conditions is subjective and depends on factors such as windiness of the general environment, normal clothing for the time of year, air temperature, humidity and sunshine. However, the criteria developed by T.V. Lawson¹² of Bristol University have been widely adopted for the wind tunnel investigation of windiness around buildings in London and compare well with other international guidance. These would form part of the basis for the evaluation of effects.

⁵ In particular, BS 5228:Part 4:1992 *Noise control on construction and open sites. Part 4. Code of Practice for noise and vibration control applicable to piling operations*.

⁶ WHO (1999) *Guidelines for Community Noise*. Berglund, B., Lindvall, T. and Schwela, D.H. Eds.. World Health Organization, Geneva

⁷ DoE and Welsh Office (1994) *Planning Policy Guidance: Planning and Noise*. PPG 24.

⁸ BS8233:1999: '*Sound Insulation and Noise Reduction For Buildings*'

⁹ DoT et al. (1994 as amended) *Traffic Noise and Vibration*. Volume II Environmental Assessment, Section 3, Part 7. Design Manual for Road and Bridges. HMSO, London.

¹² Lawson T.V. 1980: Wind effects on buildings. Volume I. Design Applications Publication.

Shadow studies will be carried out for the summer and Winter Solstices (June 21st and December 21st) and the Spring Equinox (March 21st). Impacts on sunshine and daylight will be evaluated in the context of the Building Research Establishment (BRE) handbook ‘Site Layout Planning for Daylight and Sunlight’. This document provides authoritative guidance on daylight and sunlight, and general criteria on these issues, as well as providing general guiding comments relating to overshadowing. Location of sensitive receptors e.g. residential buildings, local public amenity areas will be included in the baseline surveys.

Daylight and sunlight assessment of key residential properties will be undertaken, which will include an assessment of the impact on both new and existing residential premises. The results will be evaluated in the context of the BRE handbook mentioned above, the British Standard. The BRE guide is not mandatory and gives numerical guidelines to enable “*enough sunlight and daylight on or between buildings for good interior and exterior conditions*”. This work will be undertaken by Gordon Ingram Associates.

Light pollution and glare to surrounding residential properties will also be addressed and included in the Residential Amenity section.

3.8 ECOLOGY

The ecological value of the site itself is likely to be negligible, since it is currently developed and almost completely hard surfaced. The immediate surroundings of the site are of ecological interest, due to the presence of Regent’s Park (Site of Metropolitan Importance for Nature Conservation) and St James’ Garden to the east (Site of Local Importance for Nature Conservation).

A desktop ecological investigation of the site will be carried out to determine the status of the site and surrounds and to identify any constraints which may influence the development. Potential impacts of the proposals on ecology of areas surrounding the site will be assessed. The potential for ecological enhancement as part of landscaping and public realm proposals will need to be considered in light of the Camden Biodiversity Action Plan.

Construction activities are likely to cause disturbance, particularly in relation to construction noise, dust deposition, and the indirect effects of construction traffic.

The results of the ecological survey will form the basis of the evaluation of the potential impacts of the proposal and the definition of mitigation measures.

3.9 WATER RESOURCES

3.9.1 Surface Water

The nearest natural body of surface water to the site is Regent’s Canal, which is located approximately 1.5km north of the site. The Thames Estuary is much further, located approximately 2.7km south of the site. It is clear that neither Regent’s Canal or the Thames will be affected in any way by the development, either during the construction phase or once the development is in use.

Potential impacts of the proposal on surface water may derive from discharges to the water bodies, surface water drainage, accidental spillages of oil or other polluting substances, and dust deposition. However, it is envisaged that the potential impact of the proposals on these water bodies will be controlled, based on adoption of stringent management measures implemented under an overall Construction Environmental Management Plan (CEMP).

3.9.2 Groundwater

The hydrogeology of the site will have to be investigated in the course of the EIA process, in order to identify the vulnerability of groundwater resources. However, information provided by Sitescope indicates that the only abstraction within a 1km radius is for industrial, commercial and public services (drinking, cooking, sanitary, washing, irrigation). Moreover, information provided by the Environment Agency indicates that the site is not within a Groundwater Source Protection Zone for public water supply.

Source Protection Zones (SPZ) have been defined by the Environment Agency for groundwater sources (wells, boreholes and springs) used for public drinking water supply. The SPZs provide an indication of the risk to groundwater supplies that may result from potentially polluting activities and accidental releases of pollutants.

On this basis, the site would appear to be at low risk in relation to contamination of groundwater, although this will have to be confirmed by further research. The baseline ground water setting will be described based on searches of the public Environment Agency database and the commercial database Sitescope. Potential impacts to groundwater resources during demolition, construction and operation of the site will be identified, and will include consideration of impacts of piling method during construction.

3.10 SOIL CONTAMINATION

Preliminary research of past uses of the surrounding area¹⁰ indicate that past industrial land use within 500m of the site include railways, stations and tank related uses. A desk-study of geological and historical maps will be undertaken to determine ground site conditions and to identify any constraints, which may preclude development, by normal methods. A review of on- and off-site past land uses will determine the potential for contamination to be present on site.

An environmental audit will be carried out in line with the Part II A of the Environmental Protection Act 1990, which was retrospectively inserted by Section 57 of Environment Act 1995. This will identify the potential for “contaminated land” based on a “suitable for use” approach.

The proposed redevelopment is likely to produce quantities of spoil, for example, as a result of the excavation of the below ground element of the building and any demolition activities. The disposal of this material will be determined by the engineering nature of the material and the potential for contamination. It is envisaged that the main risks arising from the development will be the mobilisation of potential contaminants and the issue of spoil disposal, which are related to the construction stage. Care will have to be taken to avoid soil contamination especially during the construction works and the ES will contain details of the control measures proposed to avoid this.

The potential effects of soil contamination to be considered include the health risk to residents and users of roads, open space and community facilities, and the implications of spoil disposal.

3.11 RADIO AND TELEVISION INTERFERENCE

Large buildings have the potential to affect the transmission of radio waves. Effects depend on many factors, relating to the nature of the transmissions, relative positions of transmission stations and buildings, and the characteristics of the design of the newly constructed buildings. Principal effects include formation of reception shadows and reflection zones. These effects will be assessed and evaluated in relation to the proposals.

¹⁰ Source: Sitescope database (<http://www.sitescope.co.uk>)

A general baseline description of TV and radio reception at the site and vicinity will be undertaken. Reflection and shadow zones will be defined using geometric calculations, location of main TV and radio transmitters, and principles of radio propagation.

3.12 SOCIO-ECONOMIC EFFECTS

Potential impacts associated with the proposed redevelopment relate largely to employment issues, and the displacement or disruption to businesses and residents. In terms of property and regeneration, changes in housing and commercial property demand may occur.

Hunt Dobson will undertake a quantitative assessment of the socio-economic issues relating to the proposals and will outline how British Land intends to maximise these benefits for local residents. Effects on the following resources will be considered:

- employment;
- individual businesses and properties; and
- the housing and commercial property market.

Both temporary and permanent potential effects will be considered. During operation, positive effects due to net job creation, creation of homes and regeneration benefits, such as environmental improvements, education and public safety will be assessed.

The socio-economic assessment will provide a comprehensive appraisal of the scheme which demonstrates how it meets the “regeneration” policy aspirations of LB Camden, the Mayor and GLA and the Government.

3.13 SUSTAINABILITY

Although the main requirements of the ES are to discuss the environmental effects of the proposals at a local level and context, it is also relevant to examine, in broad terms, aspects related to the overall sustainability of the development, particularly in view of Government policies on the issue.

Wider impacts resulting from secondary impacts due to use of energy, transport and construction materials amongst others will be considered. It is recognised that the extent of

these impacts is dependent on the principles and design of a development, and that these more global impacts can be minimised through adoption of sustainable design.

The various aspects of sustainability incorporated in the proposals will be reviewed, to demonstrate the overall approach taken to ensure a highly sustainable development. The proposed development will be considered on the following levels:

- transport and planning issues (accordance with UDP planning standards for parking);
- mix of land uses to reduce the number of trips;
- water and energy consumption, carbon emissions arising from the development and consideration of on-site renewable energy sources;
- embodied energy and building materials, construction waste production and measures for the reuse and recycling of demolition/construction waste;
- type and quantities of operational waste expected to be produced by the development and its management; and
- compliance with Part L1/2 of the Building Regulations.

3.13.1 Energy/Water Consumption

The proposed development will result in an increase of the provision of floorspace and therefore it will result in an increase of energy and water consumption. The capacity of the existing infrastructure to meet the demand of the new structures will have to be investigated.

The assessment will draw upon the BRE guidance in, “BREEAM for Offices”, “Ecohomes” and “Green Guide to Housing” specification, addressing the main topic areas identified in these documents. In respect of energy management, the development will meet Part L1 and L2 of the Building Regulations for commercial and residential development and will anticipate the forthcoming 2006 Building Regulations. Consideration will also be given to the supply of energy from on-site renewable sources. The Draft Planning Policy Statement 22 on Renewable Energy sets out the Government's broad policy objectives relevant to renewable energy in England. Furthermore, policies in the London Plan require renewable energy in new developments. The Mayor’s target for renewable energy is for developments to

achieve 10% renewables where feasible. The assessment will follow guidance contained within:

- London Renewables - Integrating Renewable Energy into New Developments: Toolkit for Planners, Developers and Consultants (September 2004).
- Mayor of London - Sustainable Design and Construction - GLA’s draft Supplementary Planning Guidance for the London Plan (March 2005).

3.13.2 Waste Production

Given the type of development proposed, the type of waste that will be produced is expected to be similar to office and residential waste. Quantities of food waste will be involved with the residential and retail uses. This issue will have to be assessed further.

The increase in the amount of waste produced is likely to be significant compared with the current use of the site, although this will have to be verified during the EIA process. However, it is unlikely that the increase will have a significant impact on the local waste disposal framework.

A certain amount of construction waste will be produced, although its quantity will largely depend on the extent of demolition to be carried out. During the EIA the significance of construction waste production will have to be assessed and mitigation measures such as reuse and recycling of construction waste proposed.

3.14 DEMOLITION AND CONSTRUCTION EFFECTS

The environmental impacts of the construction phase will be different from those associated with the final use of proposed development. Typical demolition and construction impacts are: noise generated by construction plant and vehicles, traffic and air quality impacts of construction vehicles, dust deposition, removal of vegetation, risk of soil and groundwater contamination by oil spillages and spoil removal, surface water pollution in relation to drainage of the construction site. These impacts have been previously discussed in individual sections of this report.

Given the urban location of the site, the main construction impacts are likely to be those affecting nearby residential properties and the neighbouring conservation area and Regent's Park, particularly noise and dust dispersion.

The EIA will outline how control measures and construction procedures will relate to the magnitude of the effects. Proposals to be included in a Construction Environmental Management Plan (CEMP) for the site will be presented.

Mitigation of these cumulative impacts during construction phase will be detailed in the proposed content of the CEMP.

3.15 RESIDENTIAL AMENITY

This issue will be addressed in the ES and will draw together certain results from the foregoing assessment, whilst providing a certain amount of additional analysis to address issues affecting residential environment and amenity. These issues are considered to be of particular significance due to the proximity of the proposed development site to residential properties. The scope of issues to be addressed will include for example: changes in traffic and pedestrian levels, impacts during demolition and construction phases (including noise, traffic, air quality), wind conditions, daylight and sunlight, light pollution, glare and the impact of the building form and design when viewed from residential properties.

The degree of overlooking as a result of the proposed development will be assessed. DS5 of the UDP states that normally there should be a minimum distance of 18m between the windows of habitable rooms of different units which directly face each other. This section will demonstrate that the development will accord with DS5: Visual privacy and overlooking (which implements policies HG12 and EN19). The features of the design to limit the degree of overlooking will be set out.

The light pollution assessment will be based on guidance documents by The Chartered Institution of Building Services Engineers (CIBSE) and Institute of Lighting Engineers (ILE).

The impact of increased construction traffic on adjacent residents will be addressed in this section, and proposed delivery/construction waste removal routes will also be identified.

3.16 CUMULATIVE IMPACTS

A separate cumulative impact assessment will be undertaken to assess the cumulative impacts of the NEQ proposal together with the proposed Osnaburgh Street scheme, which is currently being considered by the Council. A planning application for the redevelopment of the Osnaburgh Street site at Regent's Place was made by British Land plc in April 2004. The application is for the construction of a mixed-use development, comprising commercial and residential uses with ancillary retail uses, totalling 72,385m² Gross External Area of floorspace.

Cumulative impacts refer to the effects of the development that may interact in an additive or subtractive manner with those of other developments that are not currently in existence, but may be the time the development is implemented.

The range of cumulative impacts to be considered will include, but not limited to:

- transport issues, including cumulative effects on road traffic, rail and pedestrians, and related secondary impacts such as noise and air quality;
- visual and townscape effects, including cumulative effects on views;
- wind and other climatic factors; and
- construction effects and related impacts such as noise, dust and construction traffic.

The zone of cumulative effects of the latter category will be limited to a radius of about 200m around the site boundary.

4.0 THE INVENTORY OF EFFECTS

The previous section provided an overview of potential environmental issues associated with the proposal and outlined which impacts are likely to be significant, which are likely to be negligible and which require further research.

The outcomes of the scoping exercise are summarised in the following table. It must be emphasised that the matrix summarises potential impacts without any account being taken of mitigation.

TABLE 4.1: INVENTORY OF POTENTIAL IMPACTS ASSOCIATED WITH THE DEVELOPMENT AND THEIR SEVERITY DURING CONSTRUCTION AND OPERATION			
Topic Area	Potential Impact/Effect	Phase	
		Construction	Operation
Land Use	Relation with UDP Designations and policies	/	/
Visual and Landscape	Effect on character/setting of buildings in nearby conservation areas	- (temporary)	--- (need of further assessment)
	Effect on long-distance views	- (temporary)	--- (need for further information)
Archaeological Impacts	Damage to archaeological resources on site	-- (need of further information)	/
Traffic/Transport	Impact on Highway Network	-	--
Air Quality	Emissions of pollutants to air	--	-- (depending on traffic flows)
	Dust deposition	---	-
Noise	Increase in ambient noise levels at sensitive receptors	---	-- (depending on traffic flows)
Vibration	Increase in vibration at sensitive receptors due to construction activities e.g. piling	--	/
Microclimate	Changes in wind patterns	-	--
	Shadow effects of buildings/ Daylight and Sunlight availability/ temperature	-	---
Ecology	Impact on local ecosystems	--	-/+
Water Resources	Effects on water quality in the nearest waterbodies to the site.	-	-
	Groundwater contamination	-- (need of further information)	- (need of further information)
	Changes in water drainage on site	-	/

TABLE 4.1: INVENTORY OF POTENTIAL IMPACTS ASSOCIATED WITH THE DEVELOPMENT AND THEIR SEVERITY DURING CONSTRUCTION AND OPERATION			
Topic Area	Potential Impact/Effect	Phase	
		Construction	Operation
Soil Contamination	Accidental spillage of polluting substances	--	-
	Mobilisation of potential contaminants	-	-
Radio/TV effects	Effect transmission of radio waves	/-	--
Energy/Water Consumption	Increased consumption of natural resources	-	-
Waste	Increased production of waste	---	-
Socio-economic	Direct and indirect creation/loss of jobs	++	+++
Residential amenity	Light Pollution and glare/ Daylight and Sunlight availability/shadow effects of building/wind conditions	/	---
	Noise, traffic and air quality impacts during demolition and construction	---	- (depending on traffic flows)
Cumulative	Cumulative effects on construction, noise, air quality, views, traffic, pedestrians and public transport	--	--

The preliminary evaluations reported in the table are to be considered potential, and refer to effects prior to the implementation of mitigation measures. They provide an indication of the weighting of importance to be given to issues, rather than an assessment of significance of the effects. The Table also indicates whether the effects would be mainly associated with the construction of the development or its operation. Permanent impacts caused by the construction or presence of new structures have been attributed to the construction phase only.

Key to potential effects prior to mitigation

- minor adverse effect
- moderate adverse affect
- major adverse effect
- + minor beneficial effect
- ++ moderate beneficial effect
- +++ major beneficial effect
- / negligible impact

APPENDIX I

REGENT’S PLACE NORTH EAST QUADRANT - PROPOSED VIEWS	
View No.	View Description
<i>Strategic Views</i>	
1	Parliament Hill, towards Palace of Westminster (RPG3A)
2	Parliament Hill, towards Palace of Westminster (SPG)
3	Primrose Hill towards Palace of Westminster
4	Greenwich SVC
<i>Local Views</i>	
5	Primrose Hill Park, west
6	Fitzroy Square, south-west corner
7	Pedestrian island at junction Tottenham Court Road/ Grafton Way (west side)
8	Euston Street east/ Junction of Stephenson Way
9	Drummond Street at junction with Melton Street
10	Cardington Street at St James's Gardens
11	Hampstead Road north of Cardington Street junction
12	Harrington Street (east side), north of Mackworth Street
13	Hampstead Road (west side) outside northern steps of Greater London House
14	Regent's Park Broad Walk north of fountain.
15	Regents Park East of Broad Walk (north) level with 'TheHonest Sausage' public house
16	Regent's Park Path east of Broad Walk west of Cumberland Gate
17	Path east of Broad Walk (south)
18	Playing fields south east of inner circle
19	Path south of Chester Road, west of Avenue Gardens
20	Regent's Park between Chester Road gate and New Lodge
21	Avenue Gardens, west of centre
22	Centre of north/ south path Marylebone Green
23	Avenue Gardens, south
24	Outer Circle west of Upper Harley Street junction
25	Outer Circle/ Cornwall Terrace (north) opposite No. 22 Cornwall Terrace
26	Hampstead Road at junction of Cardington Street

27	Stanhope Street at junction of Robert Street (south-west side)
28	Park Crescent West, south east corner of junction
29	Path west of Avenue Gardens, Marylebone Green across play area
30	Informal pathway inside Outer Circle at north end of Regent's Park, mid-way between Gloucester Gate and the Broad Walk, south of the hedge
31	Junction of Portland Place/ Park Crescent (west side)
32	Park Crescent East
33	Stanhope Street at junction of Granby Terrace
34	Mornington Crescent