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Your Ref: 0002367.ayb
Contact: John Pearson

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Alistair Billington
Senior Consultant
ERM
8 Cavendish Square
London
W1G 0ER

Dear Mr Billington,

KINGS CROSS STATION NEW WESTERN CONCOURSE - RESPONSE TO INFORMAL ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT

Thank you for your letter of the 10th September inviting our comment on your draft environmental impact assessment (EIA) scoping report. We note you are seeking our comment outside the formal process for requesting a scoping opinion as set down in the EIA Regulations 1999. However, we welcome the opportunity to comment informally on the Report and this letter sets out our response. For ease of reference we have included the paragraph number we commented on as a title for each of our comments, however we do have a few general comments to make first.

General

We are concerned that the focus of the EIA is mainly on construction impacts and does not go into sufficient detail regarding the operational impacts of the new concourse.

Platform 0 is presented as a means to reorganise the existing operations within Kings Cross Station. We are concerned that this could enable future capacity increases at Kings Cross greater than the design of the new concourse would allow and would expect the EIA to address this.

We do not feel that the baseline for the EIA fully addresses the development likely to go ahead in the area. The EIA needs to take account of the Kings Cross Opportunity Area as proposals for this area are at an advanced stage and Camden expect an outline planning application for the site by the end of 2003. Even if the application is not submitted in time to be assessed by this EIA you should take account of Camden's draft Kings Cross Opportunity Area Planning and Development Brief which sets out the type of development the council expects on the Opportunity Area. Proposals for the new concourse will need to take account of the demand generated by development on this site and nearby.

The Council expects that development on the Kings Cross site be exemplar in terms of sustainable design and construction, for example there is no mention of how the EIA will investigate the use of renewables, energy efficient design, recycling/waste measures and other matters which are key to achieving sustainable design and construction.

Paragraph 2.4.1 – Construction Works

There needs to be consistency in the construction and opening dates throughout the EIA process. Paragraph 2.4.1 gives the start date as 2007 and a four year construction date, which gives a completion date of 2011, however paragraph 3.9 defines the year of opening as 2010. In addition the implications of this timescale being delayed need to be examined in order to assess the impacts on other development in the area and the capacity of the transport infrastructure.

Table 3.1 Key Receptors In the vicinity of proposed project

Built Resources should include the London Underground Kings Cross Ticket Halls, German Gym and Stanley Buildings. Reference to St Pancras Station will need to include the St Pancras Chambers, International Station as well as the existing Station; likewise Kings Cross Station should include the western ranges and the suburban and main train shed.

Paragraph 3.2.4, 3.2.5 and 3.8

We think there is risk relying exclusively on 2006/7 as the baseline date if the application is submitted in 2003. We recognise the timeframe for the completion of the Channel Tunnel Rail Link (CTRL) works and the probability that much of this will be completed by 2006/7. However, we believe that a baseline date of 2003 (i.e. date of which the report states the submission is being made) is more appropriate. Whilst a baseline date of 2003 would need to make some assumptions about the progress of the CTRL and London Underground Limited works, it would be based on the certainty of current conditions (i.e. air quality, population in surrounding areas, retailing in wider areas, employment and so on).

Our Lawyers tell us that taking 2006/7 as the baseline date also makes it difficult to assess the cumulative impact. They say this is already a difficult discipline without having to 'float on a sea of assumptions.'

We are aware that the proposed planning application is no longer scheduled for 2003 and so we would expect the baseline to reflect the actual date of the planning application when it is made.

The EIA should take account of Platform 0 being constructed post completion of the concourse as there is no guarantee that this work will be undertaken prior to or during the construction of the new concourse.

The proposal should also take account of the proposed demolition of the taxi rank access including walls and street furniture and the proposed demolition of the Bothy building.

Assumptions include the completion of the LUL works. However, it is important to note that the appearance of the surface structures associated with this work is not yet confirmed.

The assumptions only take account of those projects which currently have planning permission. The EIA should also take account of the likely development on the Kings Cross Opportunity Area, the likely form of this development is set out in Camden's Kings Cross Opportunity Area Planning and Development Brief. The council expects that an outline application for this development will be submitted in December 2003.

Paragraph 3.3.1

We would welcome the opportunity of commenting on the assessment of what constitutes a 'significant effect', prior to the final Environmental Statement (ES) being submitted.

Paragraph 3.6 Spatial Scope

The spatial scope of the EIA should address the importance of Kings Cross on the national transport infrastructure and the need for it to interface with the St Pancras International Station.

Paragraphs 3.8.1 & 3.8.2 Definition of 2007 & 2010 Project Baseline

See comments above on baseline. The project needs to take account of other developments in the area that will generate increased passenger flow such as Kings Place and Regents Quarter on York Way.

Box 4.1 Environmental Issues Comprising Technical Scope Of The ES

Construction Waste

If there is going to be a considerable amount of excavation as part of the development the removal of spoil could be an issue particularly its transportation to landfill. Although highly desirable it cannot be assumed that spoil can be used on the rest of the site, therefore the disposal of spoil will need to be explored and transport options including use of trains assessed.

Box 4.2 Topics Scoped Out

Operational Waste

The new concourse is likely to generate large quantities of waste during its operational lifetime, the Council would therefore expect operational waste to be included within the scope of the EIA.

Climate Change

There is no information provided to justify the statement that the concourse will not generate significant levels of green house gases.

Micro Climate

There is no building currently on the site of the proposed concourse therefore the Council would expect the micro climate impacts of the new building to be assessed in order show that the resulting building does not generate any adverse effects.

Paragraph 5.1.2

We suggest that prior to undertaking the EIA the EIA team makes itself aware of the Draft Kings Cross Opportunity Area Planning and Development Brief and Draft Kings Cross Conservation Area Statement. These documents provide important supplementary planning guidance of what the criteria that the council will assess any application on.

Table 5.1 Definitions of Receptor Sensitivity

More detail would be welcomed in this table for example under 'High – Townscape' a townscape may be valued locally, nationally or internationally (Station complex is seen of international importance).

Table 5.2 Definitions of Magnitude of Change

These definitions should be further elaborated to allow wider ranges of interpretation e.g. under 'Moderate – Townscape', moderate changes can be made in the townscape more widely than just by 'townscape components.' It would also be helpful to broaden the descriptions and to elaborate on what is meant by the definition e.g. what is meant by 'an extensive area' in the High Magnitude of change.

Paragraph 5.3.1 Planning and Land Use Methodology

Again the review should include the Kings Cross Opportunity Area Planning and Development Brief and the Mayors Draft Plan.

Paragraph 5.4.4

This should include reference to local views, with respect to affects on townscape character and resources and on visual impacts.

Paragraph 5.5.2

This should include detailed consideration of effects on the impact of demolition and alteration of features of the Great Northern Hotel and King's Cross Station and their remodelling.

Section 5.7 Noise

The EIA should take into consideration Camden's UDP noise and vibration standards set out in DS6 of the adopted UDP.

Table 5.7

The thresholds set for construction noise are 75dB for day time, 65dB for evening and 45dB for night time working. If the ambient is higher than these, a weighting needs to be agreed with the local authority. We would suggest that if the ambient is equal to or up to 5dB above the proposed threshold, the ambient is taken to be the threshold. If the ambient is more than 5dB above the threshold, 5dB is added to the threshold.

Section 5.12 Ecology

It appears that you have written out any effects on ecology, with the exception of bats (protected species). We suggest that in addition the EIA should examine the impact on nesting birds.

Paragraph 6.1

The EIA should take account of government good practice guidance including best practice sustainable construction techniques and a review of working practices on other projects, examples that could be looked at are the Great Western Hospital by Corillian and the Wessex Water Operations Centre.

In the development of agreed mitigation measures, the Council will look for an environmental management system and detailed environmental management plans. This will facilitate sound management of any environmental issues arising from the long term construction of Kings Cross Central and ensure appropriate mitigation in accordance with relevant environmental standards and best practice. Good examples of Environmental Management, which the EIA should review, have been developed on the CTRL and Thameslink 2000 projects. The EIA should adopt other mitigation measures such as the

development of a Code of Construction Practice as successfully implemented on the CTRL project.

We hope this is of assistance and the Council reserves the right to provide additional comment and we look forward to further discussions over the coming months

Yours faithfully,

Bob West
Kings Cross Team Manager