

14 June 2016

David Glasgow
Principal Planning Officer
Planning and Built Environment
London Borough of Camden
2nd Floor, 5 Pancras Square
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London, WC1H 9JE

By email

Dear David

CASTLEWOOD HOUSE & MEDIUS HOUSE, NEW OXFORD STREET, WC1 – REQUEST FOR AN EIA SCREENING OPINION

This letter comprises a request for a screening opinion under Regulation 5(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) (herein 'EIA Regulations 2011'). Its purpose is to ascertain whether, in the opinion of the London Borough of Camden (LB Camden), an Environmental Impact Assessment (EIA) is required for the redevelopment of Castlewood House and Medius House, both fronting New Oxford Street, WC1 (hereafter referred to together as the site).

In accordance with Regulation 5(2), this request is accompanied by:

- A plan sufficient to identify the land;
- A brief description of the nature and purpose of the development; and
- An indication of its possible effects on the environment.

The applicant, Royal London Mutual Insurance Society, has also taken the opportunity to provide additional information under the provision in Regulation 5(2). This takes the form of an additional commentary on the development in the context of the EIA Regulations 2011.

SITE CONTEXT

The site location and proposed site layout is illustrated on the enclosed drawing (Ref CW_A_SK_160603_01)

The site comprises two buildings: Castlewood House (77-91 New Oxford Street) and Medius House (63-69 New Oxford Street), which cover a total of 0.25 hectares.

Castlewood House is located adjacent to Earnshaw Street and is an existing office building (Class B1), providing 12,848 sqm of commercial floor space. The building is nine storeys in height and also includes lower ground and basement levels. A small car park is situated at the rear of the building. Access to the car park is from Bucknall Street. To the west of the building is a courtyard (at lower ground level), which predominantly comprises hardstanding and limited soft landscaping including shrubs and a tree. Both the car park and the courtyard are situated below street level. The courtyard can be accessed from the building only.

Medius House is located adjacent to Dyott Street and comprises 451 sqm of retail (Class A1) at ground floor level and 1,486 sqm of office use (Class B1) over the five upper floors. The building also includes a basement level. The building covers the entire footprint of this part of the site.

Between Castlewood House and Medius House - and located outside of the site boundary - is the five-storey Toni & Guy hairdressing academy (71-75 New Oxford Street), which also has retail uses on part of its ground floor level. Access to the rear of Castlewood House can be gained from Bucknall Street, which connects Dyott Street to Earnshaw Street.

The Site is located within the Central Activities Zone (CAZ) and West End Special Retail Policy Area (WESRPA), as defined in the London Plan. The site is also located within the Tottenham Court Road Opportunity Area, as identified in the London Plan and London Borough of Camden Core Strategy. The Opportunity Area is partly located within the adjacent City of Westminster but covers an area of 19 hectares and sets targets for a minimum of 1,000 residential dwellings and 5,000 jobs.

The site is not included within any areas designated for their nature conservation or landscape / townscape value, and whilst neither of the properties is listed, Medius House is located within the Bloomsbury Conservation Area. The Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011) notes that the building is considered to represent a 'positive contributor' to the designated area. Castlewood House is located immediately adjacent to the Denmark Street Conservation Area, although is not within it.

The site is served by Tottenham Court Road underground station, which has an entrance approximately 200 metres to the west of the site at the junction of Charing Cross Road, Tottenham Court Road and Oxford Street. This is served by the Northern and Central lines. In addition to existing public transport connections, the site will be served by Crossrail, with a new station being constructed at Tottenham Court Road. Holborn underground station is also located approximately 500 metres to the east of the site and served by the Piccadilly and Central lines. Numerous bus routes run along New Oxford Street, Charing Cross Road and Tottenham Court Road.

The Santander Cycle Hire Scheme is also in operation, with the nearest docking station on Earnshaw Street (at the rear of Castlewood House), approximately 50 metres to the south of the junction with New Oxford Street. Given the excellent public transport links, the site is rated at the highest achievable public transport accessibility level (PTAL) of 6b.

Surrounding the site, the principal land uses are for commercial offices, with ground floor retail provision. There is some existing residential provision as part of Central St. Giles to the south of the site and the Centre Point development, to the west of the site, is currently being converted from commercial to residential use. In addition to the commercial and residential uses, notable land uses also include theatres, hotels and places of worship.

THE NATURE AND PURPOSE OF THE PROPOSED DEVELOPMENT

Under the proposals, the existing Castlewood House building will be demolished and replaced with a new ten storey building, including two basement levels – one equating to the existing lower ground level (Basement Level 1) and one equating to the existing basement level (Basement Level 2) (twelve levels in total).

A total of up to 1,600 sqm (GIA) of retail floorspace will be provided across the ground and Basement Level 1 levels. The ground floor retail units will provide a more active frontage to four sides of the building and will enliven Bucknall Street, which is predominantly used as a service road at present. Up to 17,475sqm (GIA) of office (B1) floorspace will be provided across the floors above and on Basement Level 1. This is proposed to support a wide range of businesses of different sizes. While the footprint of the existing basement level (Basement Level 2) will not change under the proposals, Basement Level 1 (the existing lower ground level) will be extended to encompass the current courtyard area.

Medius House will also be refurbished and extended by 2 additional storeys under the proposals (totalling eight storeys in height) to provide approximately 21 new affordable residential dwellings. The existing retail floorspace on the ground floor will also be retained while outdoor communal terraces will be provided for residents on level 7 (8th storey) and at roof level. A total of up to 449 sqm (GIA) of retail floorspace will be provided within the refurbished Medius House building (across the ground and basement levels).

Substantial improvements are also proposed to the public realm within and surrounding the site, which will include a new pedestrian route through from New Oxford Street linking to a pocket park on Bucknall Street. An enhanced pedestrian route will also be created to Tottenham Court Road Station and the public realm and ground floor frontage along Earnshaw Street will be improved and widened.

The conversion of two existing resident or pay & display on-street parking spaces to blue badge spaces may also be included under the proposals subject to discussion with Camden. As they would be on highway, they would not be for the sole use of the development.

The development proposals are still being developed and the potential to include either district heating and / or combined heat and power (CHP) plant within the scheme are being evaluated as part of the Sustainability Strategy. For the purposes of EIA Screening it is assumed that the proposed development will include a natural gas-fired CHP system that will operate in accordance with applicable emissions standards – this approach is considered to represent a ‘worst case scenario’ in regards to potential effects on local air quality.

THE DEVELOPMENT IN THE CONTEXT OF THE EIA REGULATIONS

This section presents the applicant’s commentary on whether, in their opinion, the proposals constitute ‘EIA development’.

Is the proposed development of a type described in Schedule 1 of the EIA Regulations?

Schedule 1 developments are those for which EIA is mandatory. The proposed development is not of a type listed within the descriptions contained in Schedule 1.

Is the proposed development of a type described in Schedule 2 of the EIA Regulations?

Schedule 2 developments are those which require EIA if they are likely to have significant effects on the environment by virtue of factors such as their nature, size or location.

The proposals are of a type listed within the descriptions of development contained within Schedule 2, falling under category 10(b) urban development projects (including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas).

Is the proposed development a ‘Schedule 2 development’?

Typically, a development is considered to be Schedule 2 development if any part of it lies within a ‘sensitive area’ or if it meets or exceeds the relevant thresholds and criteria for the relevant category of development.

Does the development lie in a ‘sensitive area’?

In the context of the EIA Regulations 2011 (Regulation 2(1)), a “sensitive area” means:

- land notified under Section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981;
- a National Park within the meaning of the National Parks and Access to the Countryside Act 1949;
- the Broads;
- a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention for the Protection of the World Cultural and National Heritage;
- a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979;
- an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000;
- a European site within the meaning of Regulation 8 of the Conservation of Habitats and Species Regulations 2010.

The development proposals do not lie within a sensitive area, as defined in the EIA Regulations 2011.

Does it meet any of the relevant thresholds or criteria listed in Schedule 2?

As amended by The Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015, the thresholds and criteria relevant to Category 10(b) urban development projects, are as follows:

- (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or*
- (ii) the development includes more than 150 dwellings; or*
- (iii) the overall area of the development exceeds 5 hectares.*

As the proposed development has a total footprint of 0.25 hectares and would create approximately 21 dwellings, this would not exceed any of the Schedule 2 thresholds or criteria as set out above.

Conclusion

The proposed development is neither Schedule 1 nor Schedule 2 development. It therefore falls outwith the EIA Regulations and is not 'EIA development'. Further commentary is provided in the enclosure to this request.

NEXT STEPS

Screening opinion

In accordance with Regulation 5(5), LB Camden shall adopt a screening opinion within 3 weeks beginning with the date of receipt of this request. Regulation 4(7) requires that the screening opinion “shall be accompanied by a written statement giving clearly and precisely the full reasons for that conclusion”.

Should LB Camden consider that it has not been provided with sufficient information to adopt a screening opinion, it can, in accordance with Regulation 5(4), notify in writing the person making the request of the points on which it requires additional information.

Documents proposed for submission alongside future planning application

In addition to the Planning Statement, Design and Access Statement (which will incorporate the Public Realm Strategy) and Statement of Community Involvement, the applicant proposes that the following documents/reports are submitted alongside the planning application:

- Landscaping Strategy;
- Preliminary Bat Roost Assessment;
- Tree Survey and Arboricultural Impact Assessment;
- Phase 1 Environmental Risk Assessment;
- Transport Assessment & Travel Plans;
- Air Quality Impact Assessment;
- Noise and Vibration Impact Assessment;
- Archaeological Desk-Based Assessment;
- Townscape, Built Heritage and Visual Assessment;
- Sunlight and Daylight Assessment;
- Energy Statement;
- Sustainability Strategy;
- BREEAM Office and Retail Assessments;
- Flood Risk Statement;
- Construction Method Statement; and
- Construction Management Plan.

The information proposed to be submitted in support of the planning application is in accordance with LB Camden’s local list and is considered to be sufficient to enable a robust assessment of the impacts of the scheme prior to the determination of the planning application.

We would be grateful if you could confirm:

- your receipt of this request and therefore the start date for the 3 week determination period;
- that you are satisfied you have sufficient information to make your screening opinion; and
- your confirmation that you are able to determine this request under delegated powers.

If you have any questions on the above, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'P. Little', with a stylized flourish at the end.

PATRICK LITTLE
SENIOR ENVIRONMENTAL CONSULTANT – ENVIRONMENTAL PLANNING & ASSESSMENT

- Enc. Additional commentary on the development in the context of the EIA Regulations 2011
Proposed site location plan (Ref: CW_A_SK_160603_01)
- cc. Graham Oliver (Gerald Eve)
Alex Neal (Gerald Eve)
Stephen Fox (CBRE)
Max Walmsley (CBRE)

ENCLOSURE

This enclosure provides further commentary on the development in the context of the EIA Regulations 2011.

If LB Camden does not determine this scheme to be 'EIA development' then, in accordance with Regulation 5(5), the Council shall adopt a screening opinion within 3 weeks beginning with the date of receipt of this request. Regulation 4(7) requires that the screening opinion "shall be accompanied by a written statement giving clearly and precisely the full reasons for that conclusion".

However, since the development lies outwith the EIA Regulations, it is understood that LB Camden is unable to determine the development to be 'EIA development'. Should the Council therefore consider the development to be 'EIA development', it may ask the Secretary of State for a screening direction under Regulation 4(9). In the event that LB Camden wishes to seek a screening direction, the Secretary of State should adopt a screening direction within 3 weeks, beginning with the date of receipt of the request, or such longer period as he may reasonably require. The request must be accompanied by all the previous documents relating to the original request for a screening opinion, together with any additional representations that the applicants wish to make.

In making a decision, in accordance with Regulation 4(6), the Secretary of State takes into account whether the development falls within a "sensitive area" as defined in Regulation 2(1) or within the indicative thresholds and criteria that are relevant to Category 10(b) urban development projects, as set out by The Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015 for Schedule 2 developments. Where he directs that EIA is required, Regulation 4(6) requires that the screening direction "shall be accompanied by a written statement giving clearly and precisely the full reasons for that conclusion". Under Regulation 6(5) and 4(9), a copy of the direction must be sent to the applicant and to LB Camden, which in turn, must ensure that a copy of the direction is made available for inspection.

The amended relevant thresholds from the 2015 Regulations are as follows:

- (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or*
- (ii) the development includes more than 150 dwellings; or*
- (iii) the overall area of the development exceeds 5 hectares.*

Furthermore, the Secretary of State considers the relevant selection criteria as set out in Schedule 3 of the EIA Regulations 2011 for screening Schedule 2 developments. These criteria include:

- Characteristics of the development;
- Location of the development i.e. environmental sensitivity of the geographical areas likely to be affected by the development; and
- Characteristics of the potential significant effects of the development in relation to criteria set out above.

A consideration of the potential effects of the proposed development in relation to the Schedule 3 selection criteria is set out in **Table 1** of this enclosure.

INDICATION OF POSSIBLE EFFECTS ON THE ENVIRONMENT

The following section provides an indication of the possible effects of the proposed development on the environment, referencing the selection criteria set out in Schedule 3 of the EIA Regulations 2011.

In line with case law on the matter of screening^{1,2}, the assessment of the possible effects on the environment takes into consideration any mitigation measures proposed that:

- are considered to be well-established and easily achievable;
- are not controversial; and
- do not in themselves have potential for significant environmental effects.

Table 1 provides an indication of the possible effects of the development on the environment.

Table 1

Schedule 3 – Selection criteria for screening Schedule 2 developments

SELECTION CRITERIA	DISCUSSION
The characteristics of development must be considered having regard, in particular, to -	
The size of the development	The site comprises a total of 0.25 hectares.
The cumulation with other development	<p>In their response to the technical consultation on EIA thresholds³, the Department for Communities and Local Government (DCLG) stated that urban development projects below the revised EIA screening thresholds “will not be likely to have significant effects either alone or in combination with other projects because of their nature, location or impact”. On this basis, the consideration of cumulative effects should be limited to those projects where:</p> <ul style="list-style-type: none"> ■ the development includes more than 1 hectare (site area) of urban development which is not dwellinghouse development; or ■ the development includes more than 150 dwellings; or ■ the overall area of the development exceeds 5 hectares. <p>With reference to these parameters, the following committed developments in the vicinity of the site (i.e. development with planning consent) have been reviewed:</p> <ul style="list-style-type: none"> ■ St. Giles Circus site (London Borough of Camden - 2012/6858/P) - redevelopment involving the erection of three buildings (5 and 7 storey) buildings facing Centre Point Tower and a 4 storey building on Denmark Place. ■ Centre Point Tower (London Borough of Camden - 2013/1957/P) – change of use to 82 residential dwellings and 13 affordable residential dwellings ■ 135-155 Charing Cross Road (City of Westminster – 11/10045/FULL) - redevelopment involving a theatre with B1 office uses on the upper floors ■ 26-32 Oxford Street (City of Westminster – 12/09915/FULL) – demolition of existing use and redevelopment involving 18 residential units and 5,735 sqm of A1 retail uses <p>Of these four developments, only the St. Giles Circus redevelopment is considered to be of a sufficient scale such that there could be the potential for cumulative environmental effects to arise in combination with the proposals to which this request for a screening opinion relates. This scheme</p>

¹ [2003] EWHC 8 (Admin) (<http://www.bailii.org/ew/cases/EWHC/Admin/2003/8.html>)

² [2005] EWHC 191 (Admin) (<http://www.bailii.org/ew/cases/EWHC/Admin/2005/191.html>)

³ [2015] DCLG Government response to the technical consultation on environmental impact assessment thresholds; Para 26.

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	<p>has therefore been considered further.</p> <p>As with the Castlewood & Medius House scheme, the construction and demolition works for the St. Giles Circus redevelopment will be undertaken in accordance with a Construction Environmental Management Plan (CEMP). The CEMP will include measures to mitigate potential impacts related to air quality, noise, transport, ground conditions and other areas. With these measures in place, significant residual impacts would not be expected. As such, should the demolition/construction phases of the Castlewood & Medius House proposals and the St. Giles Circus scheme coincide, significant cumulative impacts would not be anticipated. The CEMP for the Castlewood & Medius House scheme will be prepared and agreed with the LB Camden prior to the start of demolition and construction works. It can be secured through a suitably worded pre-construction condition to a future planning application.</p> <p>During the operational phase, the only means identified through which cumulative effects could arise between the two schemes would be through transport impacts. Other than two potential blue badge parking spaces (which would replace existing on-street spaces and would not be for the sole use of the development) no parking spaces will be provided at the Castlewood & Medius House site under the proposals, while with the high level of public transport accessibility, the majority of residents, building users and visitors would be expected to utilise public transport to get to and from the site. On this basis, significant transport effects arising from the proposals alone or in conjunction with the St. Giles Circus scheme are not anticipated. Further information on potential transport effects is provided in the sections below.</p> <p>No significant cumulative environmental effects are therefore anticipated as a result of the construction and operation of the Castlewood and Medius House scheme alongside other local committed developments.</p>
The use of natural resources	The development will not result in the use of natural resources beyond those required to construct and heat/supply the buildings. Demolition materials will be reused and recycled wherever possible.
The production of waste	<p>Material arising from the demolition/redevelopment of the existing buildings will be re-used wherever possible to minimise the amount of waste generated by the development. Material arising from any groundworks will require off-site disposal at an appropriately licensed facility.</p> <p>The completed development will include waste collection facilities in accordance with local planning policy, which encourages the separation of mixed recyclables from other wastes to minimise the amount taken for final disposal.</p>
Pollution and nuisances	<p>Risks of pollution during construction will be minimised through adherence to a CEMP, which will be conditioned to any planning permission. The CEMP will be prepared and agreed with LB Camden prior to the start of construction works and will include measures contained in the Environment Agency's Pollution Prevention Guidance (PPG) 1: General guidance on the prevention of pollution; PPG5 <i>Works and maintenance in or near water</i>; and PPG 6: <i>Working at Construction and Demolition Sites</i>.</p> <p>The proposed land uses are not of types that have a high likelihood of resulting in pollution incidences and/or nuisances.</p>
The risk of accidents, having regard in particular to substances or technology used	Not applicable. The proposed commercial use of the site is considered to have an inherently low risk of accidents associated with substances and/or technology. These are considered as typically more relevant to industrial land uses.

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The environmental sensitivity of geographical areas likely to be affected by development must be considered, having regard, in particular, to -	
The existing land use	The site is currently occupied by two commercial buildings and areas of hardstanding.
The relative abundance, quality and regenerative capacity of natural resources in the area	Not generally applicable as the surrounding environment is urban (man-made).
The absorption capacity of the natural environment, paying particular attention to the following areas -	
Wetlands	Not applicable. There are no wetlands within 500 metres of the site boundary.
Coastal areas	Not applicable. There are no coastal areas within 500 metres of the site boundary.
Mountains and forest areas	Not applicable. There are no mountains or forests within 500 metres of the site boundary.
Nature reserves and parks	Not applicable. There are no nature reserves or parks within 500 metres of the site boundary.
Areas designated by Member States pursuant to Council Directive 2009/147/EC on the conservation of wild birds and Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora	Not applicable. There are no European sites (Special Protection Areas or Special Areas of Conservation) or potential / candidate European sites within 500 metres of the site boundary.
Areas in which the environmental quality standards laid down in EU legislation have already been exceeded	LB Camden has designated the entire borough as an Air Quality Management Area (AQMA) on the basis that nitrogen dioxide (NO ₂) is likely to exceed the annual mean national air quality objectives. The London Borough of Camden 2015 Updating and Screening Assessment confirms that, although concentrations of particulate matter (PM ₁₀) remain within national air quality objectives, because these are in excess of World Health Organisation (WHO) limits, these remain a public health concern and have been retained within the AQMA.
Densely populated areas	The site lies within the London Borough of Camden, which has a resident population of approximately 234,800 people (Office of National Statistics, mid-year estimate 2014).
Landscapes of historical, cultural or archaeological significance	<p>The application site is located within the London Suburbs Archaeological Priority Area.</p> <p>The site lies partly within the Bloomsbury Conservation Area, which was first designated in 1968 to protect elements of development from Georgian and earlier eras but was subsequently extended to include areas of Victorian, Edwardian and high quality 20th century architecture. Key characteristics of the area include landscaped squares and an interrelated grid of streets.</p> <p>The site is also located in close proximity to the Denmark Street Conservation Area. This was first designated in 1984 as an extension to the Bloomsbury Conservation Area. The historic centre of the conservation area is St. Giles Church and churchyard (southwest of the site). Other parts of the conservation area include a historic street pattern with narrow passageways, and the 1960's dominated street layout around Centre Point.</p>
The potential significant effects of development must be considered in relation to criteria set out under paragraphs 1 and 2 above, and having regard in particular to -	

SELECTION CRITERIA	DISCUSSION
<p>The extent of the impact (geographical area and size of the affected population)</p> <p>The transfrontier nature of the impact</p> <p>The magnitude and complexity of the impact</p> <p>The probability of the impact</p> <p>The duration, frequency and reversibility of the impact</p>	<p>This section is sub-divided into the categories contained within Schedule 4, Part 1 Information for inclusion in environmental statements. The potential effects of the scheme are considered during both the construction and post-construction phases of development. Interrelated issues are considered in the text where applicable.</p> <p>Population</p> <p>The development proposals will result in the temporary loss of employment on the site, associated with the loss of the existing office floorspace (approximately 750 jobs are currently provided at the site). In the absence of development, it is unclear whether employment would be generated in perpetuity as the existing office space has a number of limitations that affect its functionality. The loss of jobs is considered to be temporary as the proposals include high quality retail and office floorspace. The proposals are anticipated to generate approximately 1,730 jobs.</p> <p>As such, the proposals are expected to provide an increased number of jobs at the site on comparison with current levels. A positive effect on local employment levels is therefore anticipated. These effects are, however, not anticipated to be significant.</p> <p>The proposals will result in positive - although not significant - impacts on the local labour market during the construction phase of the development. In addition, there will be secondary local benefits in terms of job creation within the supply chain.</p> <p>Due to the limited number of residential units proposed at the site, the number of new residents that would be expected in the local area as a result of the scheme would be low and significant effects on local health and education services would not be anticipated.</p> <p>During the operational phase, the development proposals will provide an enhanced public realm on New Oxford Street, Earnshaw Street and Bucknall Street which would benefit existing and new office and retail workers, as well as pedestrians using the site. This will also benefit accessibility for pedestrians utilising existing and future public transportation.</p> <p>The existing noise environment at the site comprises a mix of general urban noise and road traffic noise. A London Underground line is also located in close proximity and may have the potential to cause vibration within the site.</p> <p>A noise and vibration assessment is currently being undertaken by REC Ltd, the results of which will inform the façade design and ventilation strategy for the proposed development so as to ensure that suitable daytime and night time internal/external ambient noise levels will be achieved, in line with local authority criteria. The assessment will also recommend measures to reduce vibrational impacts, should they be required.</p> <p>It is considered that operation of the proposed development is unlikely to give rise to significant noise and vibration impacts as the development comprises only residential and commercial uses, neither of which are considered to be significant noise and vibration emitting uses. Any plant noise emissions from the completed development shall be mitigated, if necessary, to appropriate levels in accordance with local authority criteria.</p> <p>Noise and vibration during demolition and construction will be temporary in nature and shall be adequately controlled through adherence to the CEMP and in accordance with guidance and best practicable means as outlined in BS 5228 Part 1. Typical mitigation measures may include a review of demolition and construction methods, localised acoustic mitigation, and / or controlled working hours for noisy activities.</p> <p>A Transport Assessment, based on data generated from published databases and previous surveys of developments in the vicinity of the site, is currently being prepared by Arup. Additional traffic on local roads will be generated during the construction phase. However, the number of construction vehicle movements associated with the works is anticipated to be limited. Up to 70 daily vehicle movements are anticipated during peak periods, around 50% of which would be small vehicles,</p>

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while daily movements are expected to be much lower during most of the construction phase. Measures will be put in place to reduce potential impacts. During the works, the number of vehicular movements will be minimised as much as possible and trips will be timed to avoid peak traffic periods and to avoid vehicles having to wait to gain access onto site. Vehicle movements will also be limited to a specific route. This route will look to avoid roads with particularly high traffic levels while also taking into account construction vehicle routing for any local cumulative schemes with construction periods likely to coincide with the proposals. The construction vehicle route will be agreed with LB Camden in due course. These measures will be detailed within the CEMP. With these measures in place, significant impacts on local road traffic levels would not be anticipated during the construction phase.

Once the development is complete, it is envisaged that there will be limited potential for increased traffic generation as, with the exception of two potential blue badge parking spaces (which would replace existing on-street spaces and would not be for the sole use of the development), no parking spaces will be provided at the site, while the site also has a high level of public transport accessibility and, as such, the majority of residents, building users and visitors will utilise public transport to get to and from the site. It is proposed that provision for servicing, freight and deliveries will remain via Bucknall Street, as at present. Significant effects arising from impacts on local road traffic levels are therefore not anticipated.

No significant effects on population are anticipated as a result of the proposed development during the construction or operational phases.

Flora / Fauna

No statutory designated sites have been identified within 1km of the site boundary. However, four non-statutory designated Sites of Importance for Nature Conservation (SINC) are located within this radius, which are as follows:

- Russell Square, which is of Local Importance and located approximately 500m northeast of the site;
- Gordon Square, which is of Local Importance and located approximately 800m northwest of the site; and
- Lincoln's Inn Fields, which is of Local Importance and located approximately 800m southeast of the site; and
- Phoenix Community Gardens, which is of Local Importance and located approximately 800m southwest of the site

Several protected and notable species have been recorded within 1km radius of the application site including plants, invertebrates, birds and bats. Terrestrial habitats at the site are, however, dominated by buildings and areas of hardstanding with limited potential to support protected species.

A tree survey was undertaken in June 2016 by Sharon Hosegood Associates. The survey identified two trees within the site boundary as well as a number of shrubs of low ecological value. Of the trees on-site, one is mature but is in decline and is unlikely to have a safe useful life expectancy beyond ten years. The other, while in good health, is young and can be easily replaced with a similar sized tree as part of the landscaping scheme.

A bat roost survey was undertaken by BASEcology in June 2016. The survey concluded that both Medius House and Castlewood House are considered to be of negligible value for roosting bats as their architectural design - including their flat roofs - and condition, afford few Potential Roost Features (PRFs) such as crevices or void spaces suitable for bat roosting purposes. Furthermore, the location within central London, poor surrounding green infrastructure and high level of disturbance

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reduce the opportunity for general bat activity such as foraging and commuting within the immediate site environs.

Building features, such as ledges and flat roofs, have the potential to support nesting birds. Impacts on breeding/nesting birds will be avoided by undertaking site clearance/demolition works outside of the breeding bird season or, where this is not possible, under an ecological watching brief.

The development proposals will also seek to provide artificial roosting habitats for bats and birds, in addition to green roofs, to ensure that indirect impacts to any nearby designated sites will be avoided and that any potential opportunities for new wildlife habitats are created.

It is considered that the proposed development is unlikely to result in significant adverse effects on ecological resources within the zone of influence, during the construction and operation phases of the scheme. This is due to the existing site's low ecological value, distance separating the non-statutory designated ecological sites from the site and the high density of existing intervening development.

No significant effects on flora or fauna are anticipated as a result of the scheme.

Ground Conditions

Published geological maps for the region indicate that the bedrock beneath the site comprises London Clay Formation, Lambeth Group and Thanet Sand Formation, with Chalk present at depth. Superficial deposits comprise Lynch Hill Gravel. Given the site's urban locality, some made ground is likely to be present above the gravels.

A Geo-Environmental Desk Study was undertaken by GB Card & Partners in June 2016. The assessment confirmed that the portion of the site covered by Medius House has been in office use since at least 1875. No potential for previous contaminative uses was identified in this part of the site. Prior to the construction of Castlewood House, the western portion of the site was in commercial / industrial use until the 1950's. It is likely that chemicals were stored and used on-site at the time, although the quantities may have been limited. The historical building records for Castlewood House indicate that fuel oil tanks have previously been present in the basement of the building. It is possible that accidental spillages during filling or potential leakages of underground pipework have occurred in the past, resulted in localised contamination. It is also likely that there is some made ground in this part of the site and, subject to its composition, this could represent a potential source of ground gas.

The site and the immediate surrounding areas suffered bomb damage during the Second World War. Consequently, there is also considered to be a moderate risk for Unexploded Ordnance being encountered at the site.

A Phase 2 Intrusive Geo-Environmental Investigation will be undertaken in the western portion of the site prior to the commencement of construction works in order to more fully understand the ground conditions beneath this part of the site. Phase 2 investigations are not possible at the current time, owing to the presence of the existing buildings at the site, which are currently occupied. The phase 2 investigations can be secured through a suitably worded pre-construction condition to any future planning consent. The scope of the works will be agreed with LB Camden in due course.

Localised remediation, incorporation of vapour proof membranes and the provision of clean topsoil in landscaped areas are all measures that could be employed, if necessary, to ensure risks to future site users remain low, should contamination be present.

During the construction phase, potential risks to site workers can easily be controlled in most areas by the use of appropriate personal protective equipment (disposable coveralls, gloves and particulate/vapour masks). A site specific risk assessment will be undertaken prior to works commencing on site. Relevant mitigation measures, including those described above, will be recorded in the CEMP. On the basis that these measures are implemented, the potential risk to

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ground workers is considered to be low.

The proposed end use of the site is considered to pose an inherently low risk of contamination of soils.

No significant effects on or arising from soils are anticipated as a result of the proposals.

Water Resources

According to the Environment Agency's (EA) 'Flood Map for Planning (Rivers and Sea)', the application site is located within Flood Zone 1. This indicates that there is less than a 0.1% (or 1 in 1000) chance of flooding occurring each year. The site is therefore considered to have a 'low' probability of tidal and fluvial flooding.

Redevelopment can result in increases in surface water runoff entering below-ground sewers, leading to an increased risk of surface water flooding elsewhere. However, since the existing application site comprises entirely impermeable surfaces, the development proposals would not be expected to result in additional surface water runoff, and the communal terrace, pocket park and improved public realm may in fact help to control surface water runoff.

Nevertheless, it is a requirement of the London Plan (Policy 5.13) that developers seek to achieve greenfield runoff rates and use Sustainable Drainage Systems (SuDS) to manage rainwater as close as possible to its source. As such, SuDS measures will be incorporated into the scheme, where possible. Consideration will be given to the use of green roofs, rainwater harvesting and/or other SuDS measures, taking due account of the drainage hierarchy laid out in the London Plan.

Significant effects on surface water, as a result of the construction and operation of the scheme, are therefore not anticipated.

The application site is not located in a groundwater Source Protection Zone (SPZ) or within an EA local River Basin Management Plan for groundwater (required under the Water Framework Directive), according to EA data. The superficial geology on the site (Lynch Hill Gravel) is classified by the EA as a Secondary A aquifer and is therefore considered to be a sensitive receptor. The London Clay Formation is classified as Unproductive Strata. Shallow groundwater is likely to be encountered within the superficial deposits. Regional groundwater flow within the gravel aquifer is likely to be towards the River Thames in the south. Given that any contamination beneath the site is likely to be localised rather than widespread, the risk to the Secondary A aquifer is assessed as low-medium, whilst the risk to the River Thames is assessed as low. The Phase 2 intrusive investigation, which will be undertaken in the western part of the site prior to construction (secured by planning condition), will identify any requirements for remediation to avoid contamination of water resources. Provided such measures are implemented, significant impacts related to contamination of water resources would not be anticipated.

The proposed end use of the site is considered to pose an inherently low risk of contamination of soils.

No significant effects on the water environment are anticipated as a result of the scheme.

Air Quality

The application site is located within an Air Quality Management Area (AQMA) that is designated on the basis that nitrogen dioxide (NO₂) is likely to exceed the annual mean national air quality objectives, while particulates (PM₁₀) levels remain in excess of WHO concentration limits. The AQMA encompasses the entire borough.

An air quality impact assessment is currently being undertaken by REC Ltd. There are a number of receptor locations within the vicinity of the application site which could be considered as sensitive to local air quality effects. These include residential receptors at Central St Giles.

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	<p>During the construction phase, the change in traffic levels and flows associated with the development have the potential to affect local air quality; as does dust generated by the construction process.</p> <p>Dust generation during construction will be mitigated through adherence to the CEMP which will detail standard measures advocated in the London Councils Guidance (2008) such as damping down and erection of dust sheeting during demolition. Reference will also be made to the Building Research Establishment (BRE) guidance 'Controlling Particles, Vapour and Noise Pollution from Construction Sites', 2003 and to the GLA and London Councils guidance, 'The Control of Dust Emissions from Construction and Demolition', 2014. Emissions resulting from plant, machinery and HGVs will be minimised by ensuring that they are switched off when idle and by maintaining appropriate compound space within the site to minimise vehicle queuing during deliveries. Provided these measures are implemented, significant air quality effects during the construction phase would not be anticipated. Any residual effects would be short-term, intermittent and reversible.</p> <p>No significant change is expected in regards to trip generation as a result of the development proposals, once completed. The development is not anticipated to result in any increases in traffic flows of greater than 5%, which is the level at which EPUK guidance suggests that an assessment of air quality would be required (for sites within an AQMA).</p> <p>If a gas-fired CHP is included within the proposed development, this would also present an emissions source. The nature and extent of these emissions would be dependent on the specific CHP technology used, the scale of the plant and the nature of any emission abatement measures incorporated. Any CHP plant included within the development proposals will need to be operated in accordance with emissions standards set by LB Camden. Based on the scale of CHP that would be suitable for the site, published guidance⁴ suggests that EIA (and hence significant environmental effects) would not be anticipated.</p> <p>No significant effects on or as a result of air quality are anticipated under the proposals.</p> <p>Climatic Factors</p> <p>In the context of EIA, developments are typically considered in terms of climate mitigation and climate adaptation with an emphasis on carbon dioxide (CO₂) emissions.</p> <p>By using standard building practices and providing no car parking, the development aims to mitigate its potential impacts in terms of CO₂. Impacts arising from the construction and operation of the proposed development are not considered to be significant in the local, regional, national or international context.</p> <p>The area surrounding the application site is a heavily urbanised environment, characterised by medium rise, commercial properties and a mix of street widths. The limited changes to the scale and massing of the buildings on the site compared to the existing built form suggest that significant changes in sunlight and daylight levels at surrounding properties, as a result of the proposed development, would not be anticipated. Equally, on the basis that the proposals will lead to relatively minor changes to the scale and massing of the buildings at the site, current wind microclimate conditions in the pedestrian environment are also not expected to change significantly as a result of the proposals.</p> <p>No significant effects on or as a result of climatic factors are anticipated under the proposals.</p> <p>Material Assets, including architectural and archaeological heritage</p> <p>An Archeological Desk-Based Assessment is currently being undertaken by Museum of London Archaeology.</p>

⁴ [2012] Combined Heat and Power: Guidance for Local Planning Authorities, paragraph 3.5

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The application site is located within London Suburbs Archaeological Priority Area. It is understood that no archaeological investigations have been undertaken at the site or immediately adjacent in the past. There are no known sites or finds on the site as noted by the Greater London Historic Environment Record (GLHER).

The main archaeological potential for the site is for post-medieval remains. The site is 20 metres to the south-east of the conjectured location of one of London's mid-17th century Civil War forts. The exact location of these short-lived defences - which could potentially be of high heritage significance if confirmed - is uncertain and there is a possibility that they could extend into the site.

In the past, the site lay on the northern outskirts of the medieval village of St Giles-in-the-Fields. The village is shown on the Braun and Hogenberg map of 1572 as a small group of cottages beside the church and walled medieval hospital of St Giles. Faithorne and Newcourt's map of 1658 shows buildings fronting both sides of St Giles' High Street, 60 metres to the south. The site is a little too far back from the High Street to have been within the built up area and was probably in adjacent open fields. By the time of Morgan's map of 1682 the settlement had however grown and a network of small streets with buildings and gardens/yards can be seen on and around the site. There was increasing development and infilling of open spaces throughout the 18th and early-19th century, during which the area became one of the most notorious and overcrowded slums in London. By the mid-19th century, following repeated outbreaks of cholera, New Oxford Street was constructed. This was designed to clear the slum and provide a direct link between High Holborn and Oxford Street. The site has high potential for buried remains of mid/late 17th century and later structures, along with rubbish and cess pits, drains, yard surfaces, and evidence of small scale industrial activity, of low or medium heritage significance. The site also has moderate potential for archaeological remains from the Roman period (AD 43–410). A main Roman road between London and western Britain ran parallel to the line of modern New Oxford Street, along the northern side of the site, although its exact position has not been established archaeologically. Whilst much of the evidence will have been removed by post-medieval and later development, any surviving remains associated with the road would be of medium or high significance. Cemeteries were located along the main roads, but there is no archaeological evidence for such features along this stretch.

There is low potential for archaeological remains of other periods. Despite the suitability of the site's location for early settlement and farming, there is little evidence of prehistoric activity in the vicinity. Much of the prehistoric land surface has probably been disturbed by intensive post-medieval suburban development. In the Saxon period (AD 410–1066), the site would have been in open fields 290m north-west of the Saxon trading settlement of Lundenwic, centred on the area of Covent Garden, and is likely to have continued as farmland until the 17th century.

The existing buildings at the site, with their basement levels, will have removed any archaeological assets that may have been present within their footprints in the past. The potential for any previously unrecorded archaeological assets to be impacted within the site is therefore likely to be influenced by the depth and extent of the proposed basement construction and foundations for the new office block on the site of Castlewood House in comparison with the existing basement and foundations. Under the proposals, the extent of the proposed basement will be consistent with the current situation. However, the lower ground floor level (Basement Level 1) will be extended to encompass the existing courtyard area. Although this extension will be above ground, new foundations will need to be installed below, in areas of the site previously untouched by existing foundations associated with the current building. As such, any previously undiscovered archaeological assets that may be present below this part of the site (assuming that they have not already been removed by development at the site previous to the Castlewood House development), could be damaged or lost as a result of the proposals.

Potential mitigation measures will be agreed with LB Camden in due course. These could include targeted intrusive archaeological investigations undertaken prior to construction or the

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	<p>implementation of a watching brief during construction, which would ensure that archaeological assets are not removed without record. Potential mitigation measures could be secured through a suitably worded pre-construction condition to a future planning consent.</p> <p>Castlewood House sits between two conservation areas: the Bloomsbury Conservation Area to the east and northeast, and the Denmark Street Conservation Area to the west and southwest. Medius House lies within sub-area 8 of the Bloomsbury Conservation Area and is noted as a positive contributor to the character of the conservation area.</p> <p>An assessment of potential impacts of the proposals on the setting of local built heritage assets is included within the scope of the Townscape, Heritage and Visual Impact Assessment, which is currently being undertaken by Robert Tavernor Consultancy.</p> <p>To the south of the site is the Grade I listed Church of St Giles in the Fields, dating originally from 1733. To the west of the site is the Grade II listed Centre Point, and to the south-east is the Grade II listed Bloomsbury Central Baptist Chapel. All three buildings are identified as important local landmarks. The streetscape of New Oxford Street is varied in age and architectural style. It includes; the Grade II* listed mid-19th century Hazel House; the Grade II listed Nos.1, 3 and 5 Bloomsbury Street, close by to the east; and Centre Point and the Grade II listed Burtons store of 1930 to the west of the site.</p> <p>Under the proposals, the scale, massing and character of the buildings within the site will remain comparable to the existing situation and their prevailing context in relation to nearby listed buildings and conservation areas. The development proposals for Medius House, and in particular its façade, will be cognisant of its acknowledged role in contributing to the Bloomsbury Conservation Area.</p> <p>No significant effects on material assets are anticipated as a result of the proposed development.</p>
	<p>Landscape / Townscape Conditions</p> <p>A Townscape, Heritage and Visual Impact Assessment is currently being undertaken by Robert Tavernor Consultancy.</p> <p>The application site does not lie within any sites designated on the basis of their landscape or townscape quality (e.g. Areas of Outstanding Natural Beauty).</p> <p>There is not a specific urban grain in the vicinity of the site, with relatively small buildings such as Medius House (6 storeys) and the Toni & Guy academy (5 storeys) being adjacent to taller structures such as Central St. Giles (11 to 15 storeys) and set in the context of the tallest local landmark of Centre Point (35 storeys).</p> <p>The application site does not fall within a strategic viewing corridor and the proposed increase in height of the redeveloped Castlewood House building and extended Medius House will not exceed the height of the adjacent Central St. Giles development so that there will be no change to the prevailing skyline.</p> <p>There will unavoidably be some adverse effects on townscape quality during the construction phase. However, these effects are considered to be short term, intermittent, reversible and not significant.</p> <p>Once completed, a key objective of the development is to provide an improvement in the overall quality of the townscape and streetscape on and around the site. In addition, the proposed associated public realm extension and enhancements will contribute to the positive transformation of the existing streetscape and pedestrian environment.</p> <p>No significant effects on landscape/townscape are anticipated as a result of the proposed development.</p>

Source: EIA Regulations 2011

Site Location Map

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