

7<sup>th</sup> December 2020

FAO Jonathan McClue  
Development Management Planning Services London Borough of Camden  
Town Hall Argyle Street  
London WC1H 8ND

Trium Environmental Consulting LLP  
68 - 85 Tabernacle Street  
London, EC2A 4BD

+44 (0) 20 3887 7118  
hello@triumenv.co.uk  
www.triumenvironmental.co.uk



Dear Jonathan,

**Eastman Dental Hospital Site and Buildings (including the former Royal Free Hospital, the Eastman Dental Clinic), 256 Gray's Inn Road WC1X 8LD. Application for non-material amendments to Planning Permission 2019/2879/P. Statement of Environmental Impact Assessment (EIA) Conformity for a Minor Material Amendment.**

## Introduction

Further to the detailed Planning Application (Ref. 2019/2879/P) being granted Planning Permission in 2019, University College London ("The Applicant") has commissioned Trium Environmental Consulting LLP to provide a Statement of Environmental Impact Assessment Conformity to support a minor material amendment application relating to amendments to the basement of the Proposed Development.

The amendment proposed has been considered in the context of the EIA and the Environmental Statement submitted in May 2019 (Original ES) and the Statement of EIA Conformity dated 1<sup>st</sup> October 2020 for a Minor Material Amendment relating to the amendments comprising increasing of the basement (at level B2) of Plot 1 to accommodate a sprinkler tank.

This review has ascertained whether any new or materially different significant environmental effects are expected as a result of the proposed minor-material amendment and whether any further environmental information needs to be provided in respect of the amendment. This Statement of EIA Conformity presents the results of this review.

## Summary of Amendments Proposed

The amendments proposed comprise (Figure 1):

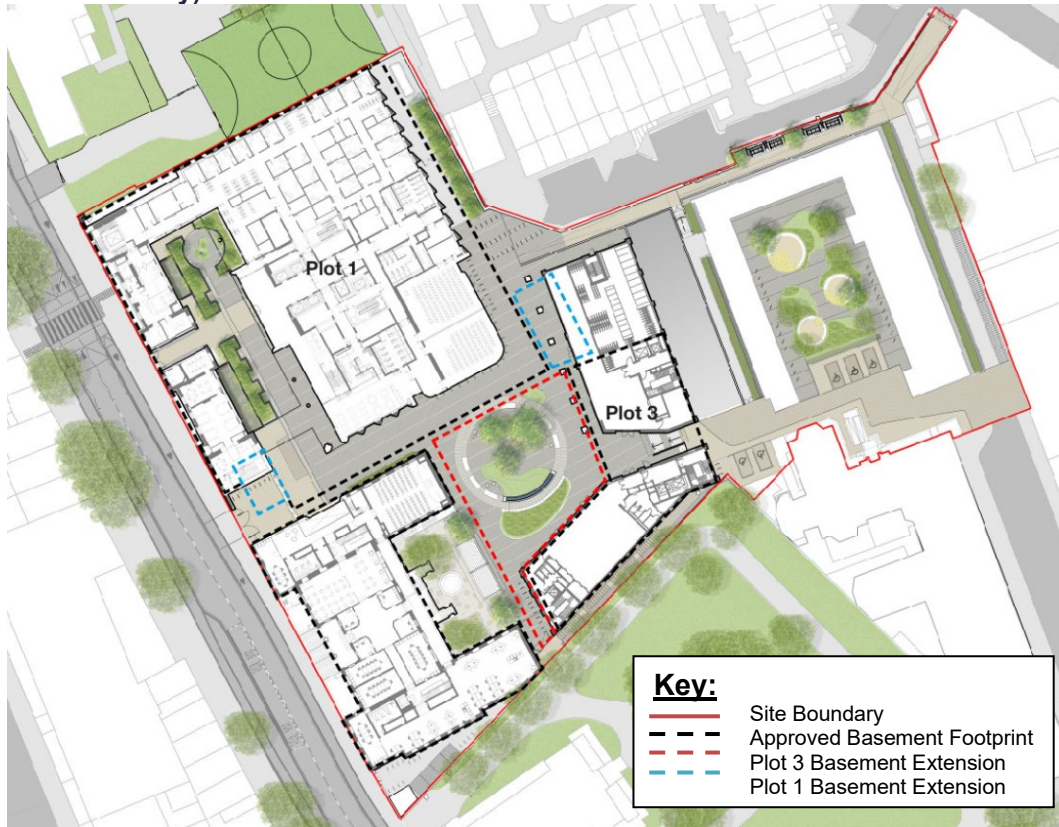
- Increasing the width of the basement (at levels B1 and B2) of Plot 3 (to the north and west of the original basement areas) to accommodate a new lecture theatre. The new lecture theatre will comprise 921m<sup>2</sup> of additional educational floorspace (Land Use Class D1). The approved and proposed plans are provided in Appendix A; and
- Increasing the basements by 252m<sup>2</sup> (at levels B1 and B2) of Plot 1 to accommodate the provision of additional plant (associated with elevator use). The approved and proposed plans are provided in Appendix B.

No above ground changes are proposed. The demolition, construction and refurbishment programme and associated trip generation has been reviewed by ISG Limited, the Applicants construction contractors, who have been brought on board since submission of the planning application. The following changes have been made:

- The demolition, construction and refurbishment programme has been updated to reflect the increased basement; and
- The construction works have been amended to include the Plot 1 substructure works which are being undertaken concurrently with the substructure works for Plot 3 (previously undertaken in Year 4 alongside the Plot 2 refurbishment works) (Appendix C).

As a result of the above amendments (and including the amendment which was the subject of the EIA conformity letter dated 1<sup>st</sup> October 2020 to increase the basement of Plot 1 to accommodate a sprinkler tank) and a more detailed review of the construction related vehicle movements, ISG have identified that during the busiest time on site over the demolition, construction and refurbishment programme, an estimated 40 deliveries will take place, this equates to 80 vehicle movements (40 in, 40 out) per day during the peak works period (Appendix D). This is a notable decrease in traffic numbers when compared to the estimated 66 deliveries or equivalent 132 vehicle movements presented in the Original ES, which was based on a worst case high level programme and the scope of works available at the time.

**Figure 1** Basement Extension Plan (including that dealt with in the 1<sup>st</sup> October 2020 Statement of EIA Conformity)



## Review of EIA Conformity

The proposed amendments have been reviewed in the context of noise and vibration, air quality and socio-economics. Archaeology and ground conditions have also been re-considered despite being scoped out of the Original ES. No other 'topics' covered by the EIA are considered to be affected.

### Noise & Vibration

The noise and vibration study within the ES assessed demolition and construction plant noise and vibration effects to buildings and building occupants within the study area and demolition and construction traffic noise and vibration effects to existing and future residents within the study area. Given that the revised demolition and construction traffic numbers identify a reduction in the number of trips, it has been determined that the reduction in construction traffic would result in a reduction of noise levels by approximately 1 decibel. This change in noise would not alter the significance of the construction traffic noise effects identified in the Original ES which remain valid and unchanged.

With regards to the construction plant noise and vibration assessment, the amendments proposed will be unnoticeable because they are relatively small when considered in the context of the overall construction works and programme. Furthermore, the noise assessment was based on a number of worst-case assumptions. The assessment therefore would not change as a result and remains valid and unchanged.

With regards to operational plant, the addition of the lecture theatre and lift associated plant does not change the assessment of the building services plant associated with the operation of the Proposed Development upon both

proposed and existing noise sensitive receptors. The proposed amendment will therefore not change the air quality assessment within the Original ES which remains valid.

#### *Air Quality*

A qualitative construction dust risk assessment was carried out as part of the Original ES as well as the potential for construction vehicles to impact upon local air quality. The demolition and construction traffic numbers have been reviewed by the air quality specialists and, whilst the reduction in vehicle movements is clearly beneficial, they are not anticipated to alter the significant effects reported within the Original ES. The air quality assessment within the Original ES remains valid.

The Air Quality assessment assessed the proposed boiler plant and the single emergency diesel generator. The proposed amendment does not change the specifications of the boiler plant and the single emergency diesel generator assessed within the ES and therefore the Air Quality Assessment within the Original ES remains valid and unchanged.

#### *Socio-Economics*

The socio-economics assessment within the ES assessed the employment and additional expenditure once the Proposed Development is complete and operational. Given that the Plot 1 basement extension is associated with elevator plant, it has been determined that this will not alter the socio-economics assessment presented in the Original ES. The Plot 3 basement extension will provide an additional 921m<sup>2</sup> of lecture theatre floorspace (Land Use Class D1), the Original ES socio-economic assessment was based on employment numbers generated by the Applicant (and was not based on floor area schedule), therefore the additional lecture theatre will not result in additional employment numbers. Therefore, the basement extensions would not alter the socio-economics effects identified in the Original ES, which remain valid and unchanged.

#### *Archaeology*

An Archaeological Desk Based Assessment was submitted with the Scoping Report that accompanied the EIA. Historic England and the Greater London Archaeology Advisory Service (GLAAS), who were consulted as part of the scoping process stated they felt no further works were required with regard to Archaeology given that the potential impacts on Archaeology from the Proposed Development were understood. The proposed amendments do not change this position.

#### *Ground Conditions*

The impacts of ground contamination as a result of the Proposed Development were scoped out of the Environmental Statement on the basis that a number of mitigation measures were proposed (*Chapter 12: Mitigation and Monitoring of the Original ES*) to ensure no significant effects. The inclusion of the additional basements in Plots 1 and 3 to accommodate the elevator plant and lecture theatre respectively, does not change the mitigation proposed and will not give rise to a significant effect.

#### *Cumulative Schemes*

Since the submission of the Original ES it has been identified that the Royal National Throat, Nose And Ear Hospital Site (330 Gray's Inn Road) development (ref:2020/5593/P) has been submitted to the LBC and validated on the 2<sup>nd</sup> December 2020. The scheme comprises 13,275 m<sup>2</sup> of office space, a 182 key hotel, a restaurant, café, gym and 76 residential units. Ordinarily, the Environmental Statement would only include schemes, within the cumulative assessment, that have been consented, however in this case the Throat, Nose and Ear development has been qualitatively considered given its location approximately 320m north of the Proposed Development.

The planning application for the Throat, Nose and Ear Site included a number of technical assessments including air quality, noise and vibration, transport, daylight and sunlight, archaeology, ground contamination, biodiversity, townscape, visual and built heritage, a flood risk assessment and drainage strategy and a health impact assessment. The planning application was not the subject of an Environmental Statement as it did not breach the EIA screening criteria and did not have the potential for likely significant effects.

The various technical assessments submitted as part of the planning application do not highlight any significant adverse environmental effects and it is unlikely that there would be any significant cumulative environmental related effects during operation. The construction programs of both schemes do however overlap and whilst not quantitatively assessed, there may be potential for construction related impacts, albeit temporary however, it is

not uncommon for sites in close proximity to be in construction concurrently. Both schemes would be subject to Construction Environmental Management Plans, agreed with the London Borough of Camden to reduce construction related effects as far as possible.

## **Conclusion**

It is considered that the proposed amendments will not make any material difference to the assessments and conclusions in the Original ES. They do not give rise to any materially different or additional likely significant environmental effects, both in the context of the development as a whole and cumulatively. Therefore, no further EIA work or the submission of further environmental information is required. The ES (as amended) remains valid and an appropriate EIA for the redevelopment proposed at 256 Gray's Inn Road.

Yours sincerely,



**Abbey Musker**

**Partner**

**Trium Environmental Consulting LLP**

**Appendix A** – Existing plan and proposed plans accommodating the Plot 3 Basement Amendments

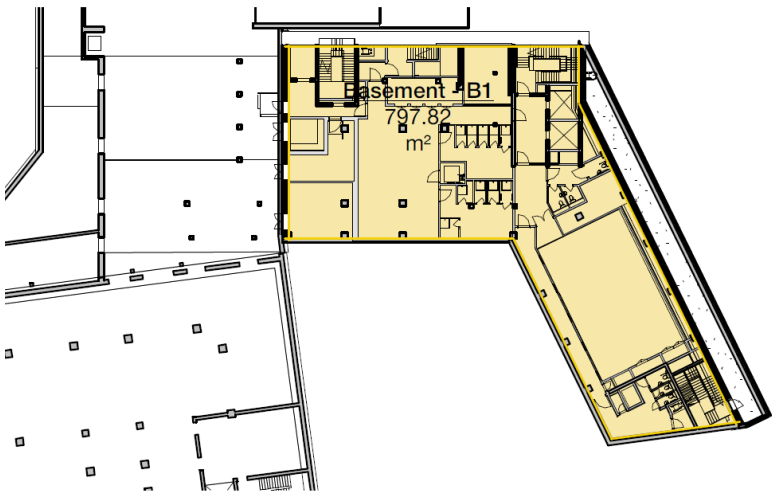
**Appendix B** – Existing plan and proposed plans accommodating the Plot 1 Basement Amendments

**Appendix C** – Updated Demolition and Construction Programme

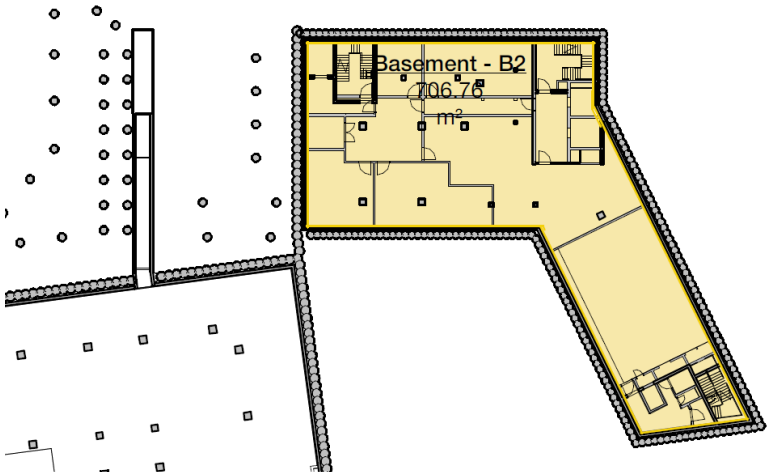
**Appendix D** – Updated Demolition and Construction Traffic Numbers

Appendix A – Existing plan and proposed plans accommodating the Plot 3 Basement Amendments

Existing Plot 3 Basement Plans

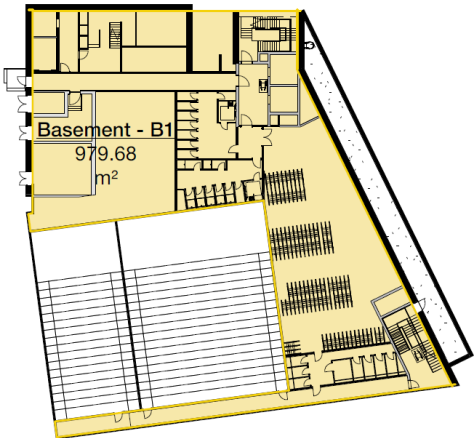


Level B1

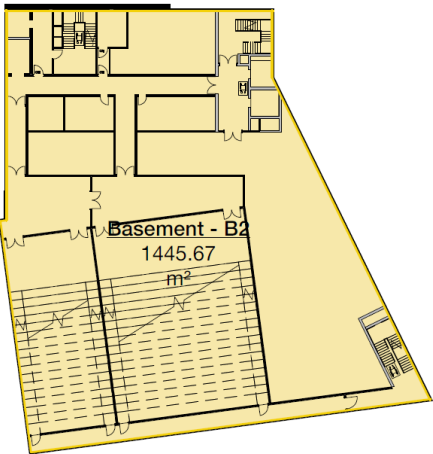


Level B2

Updated Plot 3 Basement Plans



Level B1



Level B2 -

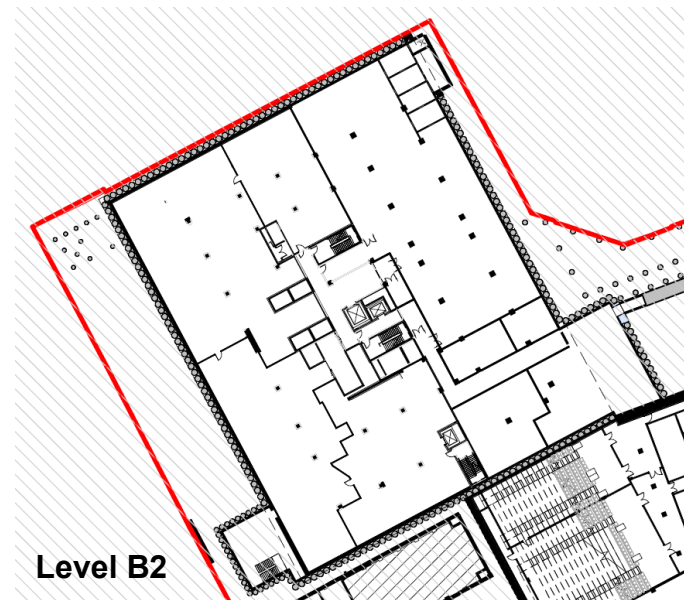


**Appendix B** - Existing plan and proposed plans accommodating the Plot 1 Basement Amendments

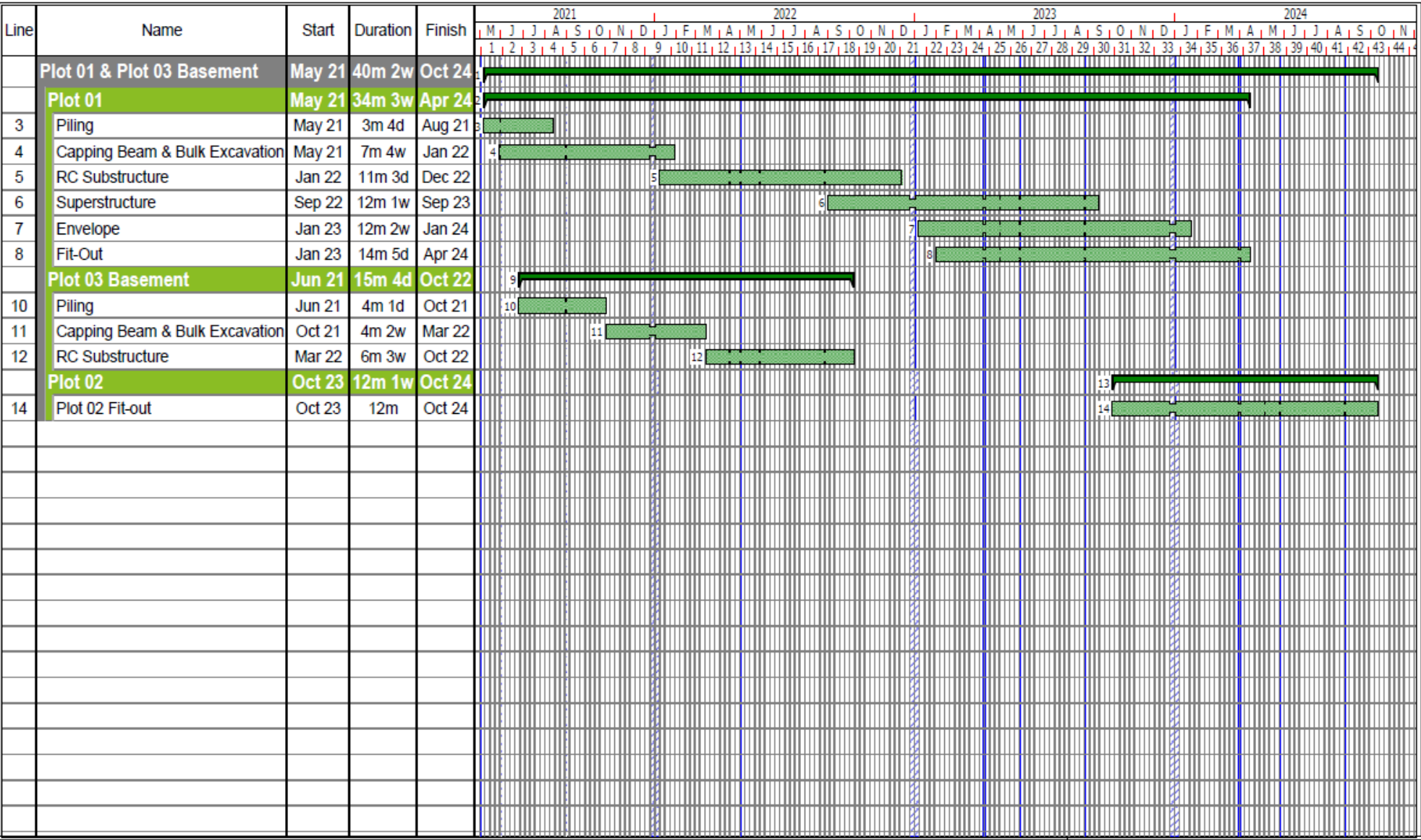
**Existing Plot 1 Basement Plans**



**Updated Plot 1 Basement Plans**



Appendix C – Updated Demolition and Construction Programme



Appendix D – Updated Demolition and Construction Traffic Numbers

