

A1.3 - EIA Scoping Opinion Comments Summary

DfT/Consultee Scoping Response - Bank Station Capacity Upgrade Works

The following table details the DfT and technical consultee comments on the EIA Scoping Report relating to Bank Station Capacity Upgrade Works (TWAO).

Ref	Consultee	Subject of comment	Comment	Response	Outcome/Ref
T1	Department for Transport, TWA Orders Unit	General EIA Scope	The Secretary of State considers that the environmental issues identified in the Scoping Report are properly ones that should be addressed in the ES for the project. He agrees that the topics considered in sections 16 (Ecology), 17 (Daylight, Sublight, Overshadowing and Microclimate) and 18 (Electromagnetic Compatibility) of the Scoping Report can be scoped out of the EIA for the reasons given in those sections.	Gratefully noted. The EIA has therefore been undertaken with an assessment scope as proposed in the Scoping Report, cognisant of the comments and responses as detailed in the remainder of this table.	ES
T2		Proposed development	The EIA should consider potential construction access arrangements to the whole block site from all four sides not just from Cannon Street.	Access options during construction have been considered as a factor as part of the design process, in consultation with City of London planning and transport teams. The construction phase layout of the Whole Block site is largely governed by the works and equipment that need to be accommodated at the site and the alignment of the permanent works (shaft and escalator barrels), the location of which is constrained by the existing below ground infrastructure to which the new station entrance will link. This layout essentially precludes construction access at all times other than during demolition, from anywhere other than Cannon Street.	ES - Consideration of alternatives chapter and within the Transport Statement.
T3		EIA – proposed approach	The assessment of cumulative effects, in relation to transport and highways, should take account of non-development related activity such as transportation and streetscene enhancement schemes, major planned utility work programmes and major known special events.	An assessment of cumulative effects with other developments (including plans or programmes) has been made as part of the assessment. In developing a traffic management plan, the project team will work with utilities providers to identify any major planned works which could require consideration when the precise timing of the BSCU and other utility works will be better understood. The criteria for which developments (in terms of their status) is considered is outlined within the TWAO Works Scoping Report in section 5.6. This is based on advice URS have received from the Planning Inspectorate.	ES - Transport Assessment.
T4		Transport and movement	The surface level study area should include New Change and Ludgate Hill.	The comment is assumed to stem from early proposals that indicated that construction traffic could approach the worksites from the west. Through more detailed assessment, the proposals now focus all construction traffic via routing arrangements to the East, and as a consequence construction traffic will not be permitted to impact on these junctions. In terms of other diverted traffic it has also been agreed with TfL and the City of London Corporation that the impacts are relatively localised and as a consequence the area containing New Change and Ludgate Hill will not be influenced by the proposals. The scope of the assessment has been discussed with both TfL and City of London Corporation; these junctions are now excluded from the scope.	The results of all studies and consultation will be reported in the Transport Assessment.
T5				The EIA should include an assessment of footway widths and existing/future levels of footway crowding on routes leading to and from existing and new station entrances.	This is an integral part of the Transport Assessment.
T6		Noise and vibration	The monitoring locations and the monitoring protocol referred to at 8.4.4 should include all residential locations referred to by the City of London Corporation in their comments on the Scoping Report.	Noted. The suggested locations are included in the assessment.	ES - Noise and Vibration Chapter.

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T7		Air quality	The duration of, and methods for, measuring nitrogen dioxide in the immediate vicinity of the project should be sufficient to establish reliable baseline data, in consultation with the Environmental Health Officer for the City of London Corporation.	Following further discussion with the CoL Environmental Policy Officer, CoL suggested using data from the London Atmospheric Emissions Inventory (LAEI) for the purpose of model verification. The LAEI is based on monitoring data from a series of continuous monitoring stations across London. There is only one of these stations within the air quality study area that measures concentrations of nitrogen dioxide (NO2), located adjacent to Upper Thames Street. This location is not considered to be fully representative of conditions at locations away from Upper and Lower Thames Street. As such, we believe the use of data from the diffusion tube survey, to supplement the data obtained from the monitoring station, for model verification is a more robust method.	This will be reported in the ES Air Quality Chapter.
T8			The assessment and mitigation of the construction and demolition phase of the project should be undertaken in line with the Greater London Authority Supplementary Planning Guidance 'The control of dust and emissions during construction and demolition' which is currently in draft.	Such an approach is anticipated and any required control measures will be integrated into the project CoCP.	CoCP
T9		Water resources and flood risk	The EIA should address the implications of any dewatering of the alluvium/river terrace deposits of the shallow aquifer that is required in connection with tunnelling and shaft construction.	The Water Resources assessment considers this issue.	ES - Water Resources and Flood Risk Chapter.
T10			The EIA should consider the tidal influence of the River Thames on groundwater levels in the shallow aquifer.	The Water Resources assessment considers this issue.	ES - Water Resources and Flood Risk Chapter
T11		Socio-economic and community effects	The EIA should take account of the effects of the project on the operational requirements of the Mansion House.	Noted. The ES considers the potential for any likely significant effects on Mansion House within the Noise and Vibration, Heritage and Transport assessments which consider Mansion House as a receptor as is necessary.	ES - Noise and Vibration, Heritage and Transport Assessment.
T12		Construction environmental management	The EIA should refer to the City of London's Guidance Notes for Activities on the Public Highway (in relation to scaffolding and hoarding designs) and to London Underground Limited's involvement in the City's Considerate Contractor Scheme.	The references will be considered and information included in the project CoCP as necessary.	CoCP
T13	Environment Agency	Waste	The SWMP should show what waste will be created (types), how much would be created (quantity) and where the waste would be going (transfer and storage).	The Waste Management and Resource Use ES chapter estimates waste types and quantities, and as far as possible, given the future date of anticipated waste arisings, how waste would be managed. Construction contractor Dragados will develop and operate a Site Waste Management Plan as an internal waste management and monitoring tool. The use of a SWMP is a means of implementing best practice and going beyond current minimum statutory requirements.	ES - Waste Chapter appendix.
T14		Water resources and flood risk	The on-site works (including tunnelling and shaft construction) may require dewatering of the alluvium/river terrace deposits of the shallow aquifer system. The implications of which should be addressed in the EIA. A permit would be required for this activity if discharge of water into a surface water body was planned. A discharge of this type would need to meet strict environmental limits and so testing prior to discharge and possibly also on site treatment of the water could be required.	The potential need for discharges and therefore authorisation for this is considered in the Water Resources and Flood Risk ES chapter. The project would fully address any requirements to obtain permits for activities and this is documented within the project CoCP. The Contractor will manage and dispose of foul water effluents from the work sites as follows: - by preference, connection to the local foul water sewer (to be agreed with Thames Water); and/or - containment by temporary foul drainage facilities and disposal off-site by a licensed contractor.	ES - Water Resources and Flood Risk Chapter and Project CoCP.

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T15			A utility search should be completed which should include how tunnelling/ dewatering may impact water abstractions in the area.	Hyder Consulting Ltd completed a utilities search in 2012 which has informed the proposed approach and the Water Resources and Flood Risk ES chapter. The chapter also identifies and consider the potential for impacts on public water supply and private licensed abstractions in the area.	ES - Water Resources and Flood Risk Chapter.
T16		Groundwater and land contamination	The limited/no data on the tidal influence from the Thames on groundwater levels should be addressed in the EIA to improve the conceptual model.	In the Water Resources and Flood Risk assessment we developed the conceptual understanding further and tidal influence on groundwater levels are expected to be negligible. There could be minor influence in the buried River Walbrook, however, below the base of the potential archaeological stratum, if inflows are high in the utilities and potential grout shaft, these will be allowed to flood with the excavation potentially underwater until the shaft is sealed. This inflow will then be pumped to a suitable disposal point as per the Code of Construction Practice.	ES - Water Resources and Flood Risk Chapter.
T17			Piling guidance, provided by the Environment Agency (Piling into Contaminated Sites, 2002) should be considered. This sets out the risks associated with different piling construction methods.	The guidance was a consideration in developing the proposed scope of assessment and is considered as part of the Land Contamination assessment itself.	ES - Land Contamination.
T18	City of London Corporation	Noise and vibration	The EIA should include all residential locations including: Abchurch Yard, 129 Cannon Street; Travel Lodge, Abchurch Yard, 21-23 St Swithins Lane; Fish Mongers Hall, London Bridge; and 6 Laurence Pountney Lane.	Baseline monitoring at these suggested locations has been undertaken and considered within the ES noise and vibration assessment.	ES Noise and Vibration Chapter.
T19		Air quality	The City of London has been declared an AQMA and as such requires Best Practicable means for controlling pollution.	This was acknowledged within the Scoping Report - Section 11 and is considered as an integral part of the assessment, along with any measures which can be implemented via the CoCP.	ES Air Quality Chapter and CoCP.
T20			Three months monitoring using diffusion tubes is not sufficient to obtain reliable baseline levels of nitrogen dioxide. Three months data cannot be annualised accurately and should not be used to verify model predictions. Diffusion tubes are not accurate enough to verify a model.	Data from a six month baseline NO2 diffusion tube survey within the study area has been used to supplement data gathered by the Walbrook Wharf automatic continuous monitoring station for the verification of the baseline road traffic emissions model. It is acknowledged that such monitoring methods have inherent uncertainties, but these are, however, the best available means for gathering and obtaining such data.	This will be reported in the ES Air Quality Chapter.
T21			Assessment and mitigation of the construction and demolition phase of the project should be undertaken in line with the Greater London Authority Supplementary Planning Guidance 'The control of dust and emissions during construction and demolition' (currently in draft format).	Such an approach is anticipated and any required control measures will be integrated into the project CoCP.	CoCP
T22			The fuel for the energy plant is not specified. The developers should avoid biomass or biofuels due to their on-going impact on local air quality.	The use of biomass/biofuels is not proposed and so, whilst all fuel types are generally considered as part of energy strategy work, the City's preference is acknowledged.	Application energy strategy.
T23			The site must provide real time monitoring for dust, air and vibrations. A text alert system should be setup for this. Real time monitoring should be carried out and the site management team should have a system set in place to receive a text and email alert when any trigger value is breached.	Control measures will be detailed in the project CoCP - those suggested are anticipated to be used.	CoCP
T24			A system of ventilation must be provided to reduce smell nuisance from cooking from A1 and A3 units. Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance. Flues should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings.	The design has made allowance for such equipment at fit out, including space provision for flues and ventilation terminals at roof level. Locations have been identified having regard to the requirement to minimise smell nuisance to OSD and neighbouring building occupiers.	N/A

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T25			Consideration should be given to providing a unit on site whereby the necessary back filling materials are reused from the demolition works. This will in turn save the removal of concrete from site and the bringing back to site crushed concrete for filling materials. This will reduce vehicle movements to and from site.	Consideration of such measures will be integral to the project with such measures documented in the Code of Construction Practice.	CoCP
T26			No low level ventilation or entrances should be located adjacent to ventilation grills that have been blocked up by Thames Water Utilities. A sewer vent pipe should be installed in your building and terminating at a safe outlet at roof level atmosphere.	Building entrances will be in similar locations to those currently present on the site. The OSD design will ensure space provision for a sewer vent pipe as required, terminating at roof level.	N/A
T27			Applications for permanent power should be made to the power companies as soon as possible, whereby the use of generators on sites is eliminated. The use of generators is strongly discouraged in the City of London Corporations, for buildings processes.	It is planned and anticipated that permanent power will be available on-site prior to/during works and applications for permanent power will be made to power companies as early as possible. The use of generators on sites will be avoided as far as reasonably practicable.	CoCP
T28			All Non-Road Mobile Machinery (NRMM) should meet Stage IIIB emission criteria, unless it can be demonstrated that Stage IIIB equipment is not available. If Stage IIIB equipment is not available, NRMM must be fitted with particle traps and/or catalytic exhaust treatment wherever possible. An inventory of all NRMM must be kept on site and all machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment.	Such measures are integrated within the project Code of Construction Practice.	CoCP
T29		Waste	The scoping report indicates that the provision of waste storage and collection facilities in the completed development will be covered.	Consideration of waste arisings and management is considered in the ES in a Waste Management and Resource Use chapter.	ES - Waste Management and Resource Use Chapter.
T30		Archaeology	The EIA should include an archaeological desk based assessment as set out. The results of the assessment should inform a programme of archaeological evaluation of trial work to an agreed method statement to provide additional information on the nature, character, condition and date of surviving archaeological remains and supplement the findings of the assessment.	A desk based assessment has been undertaken as proposed in Section 10 of the Scoping Report. The desk based assessment establishes baseline conditions for the potential survival of archaeological remains at the Whole Block and Arthur Street sites. The results of the assessment were included in the ES submitted as part of the OSD planning application and will inform the design of a programme of archaeological evaluation and the preparation of a written scheme of investigation or method statement detailing the archaeological works (to be undertaken post planning, but pre/during construction works) for approval by the City of London Corporation. The purpose of the archaeological evaluation will be to confirm the presence/absence of buried archaeological remains and to determine (where possible) the nature, depth, extent, character and date of any surviving archaeological remains encountered.	ES Archaeology Chapter.
T31		Transport	The City would expect the EIA to consider potential access arrangements from all four sides of the site rather than just focusing on Cannon Street.	The Transport Assessment and ES Chapter considers the need to access all sides of the Whole Block Site, as well as all properties on Arthur Street, Nicholas Lane, Abchurch Lane and Walbrook. Access options during both construction and operation of the OSD for pedestrians and for servicing have been considered as part of the design process, in consultation with City of London planning and transport teams. Options considered and the reasons for the proposal made will be reported in the ES Consideration of Alternatives chapter and within the transport statement.	ES - Consideration of alternatives chapter and within the Transport Statement.

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T32			In addition to development activity, 'Cumulative effects' need to include non-development related activity in LUL's assessment e.g. transportation and streetscene enhancement schemes like Aldgate. These could be identified through the LIP process or the City's major works/ gateway project plan. Also, there is a need to include major planned utility work programmes and major known special events.	The Transport Assessment and ES Chapter includes a description of the current and future baseline, the latter of which includes the Bank Area Enhancement Strategy which includes the known streetscene enhancements. The future baseline also includes transport projects such as the Northern Line upgrades and Crossrail. An assessment of cumulative effects with other developments (including plans or programmes) has been made as part of the assessment. In developing a traffic management plan, the project team will work with utilities providers, CoL and TfL to identify any major planned works or special events which could require consideration when the precise timing of the BSCU and other utility works will be better understood. The criteria for which developments (in terms of their status) is considered is outlined within the TWAO Works Scoping Report in section 5.6. This is based on advice URS have received from the Planning Inspectorate.	ES - Transport and other specialist assessments.
T33			The EIA needs to specifically address questions of:	It is unclear whether this comment relates specifically to the construction or operational stages of the project, however the ES/planning documents consider the points raised in relation to both where relevant.	-
T34			· Road safety;	This is an integral part of the Transport Assessment.	ES Transport Chapter and Transport Assessment
T35			· Control of mud on the highway;	This is considered within the Code of Construction Practice (CoCP) a draft of which will be included as an appendix to the ES.	CoCP
T36			· Needs of the emergency services;	Access and design requirements are considered and included in the Design and Access Statement (DAS) and the Transport Assessment.	DAS and Transport Assessment
T37			· Impact on the City's Traffic & Environment Zone (Ring of Steel);	This is an integral part of the Transport Assessment.	ES Transport Chapter and Transport Assessment
T38			· Need to facilitate other activities on the highway e.g. special events;	The application includes a Transport Assessment, the scope of which has been agreed with CoL Transport Officers. This includes consideration of the needs of all users (e.g.: pedestrian, bicycle and public transport).	ES Transport Chapter and Transport Assessment
T39			· Needs and impact on utilities; and	Utilities needs and impacts are considered within the ES, particularly in regard to water supply and flood risk.	ES Water Resources and other chapters.
T40			· Impact on the junction of Cannon St/King William St/Gracechurch St/Eastcheap and the need to address the Monument subway weight restriction due to the closure of Arthur St.	This is considered as an integral part of the Transport Assessment.	ES Transport Chapter and Transport Assessment.
T41			The images of the new station entrance on Cannon Street show footway security bollards. This issue needs to be specifically addressed in terms of the design of the OSD, and in the context of the EIA, in terms of the impact that a sea of bollards would have on pedestrians, cyclists and the highway. The EIA should acknowledge that the City's policy is that any necessary security measures for new buildings must be on the private realm and not on the public highway. Note that section 7.6.2 states that 'there will be no detrimental impact on the road layout in relation to its baseline (current) situation'. Clearly the introduction of footway bollards would conflict with this message.	No bollards are proposed in relation to the OSD, however to fulfil safety and security requirements bollards are required to protect the station entrance. The Transport Assessment has undertaken Legion modelling on the footways adjacent to the new Station Entrance on Cannon Street, in order to show the existing desire lines and Level of Service in this location. Legion modelling, including the presence of the bollards, has also been undertaken to show the effect of the new Station Entrance, and the assessment has found that the changes will not have significant effects. The bollards are not expected to affect cyclists or the highway.	Transport Assessment

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T42			The study area should be extended to cover the missing wedge containing New Change and Ludgate Hill, both heavily used bus routes.	The comment is assumed to stem from early proposals that indicated that construction traffic could approach the worksites from the west. Through more detailed assessment, the proposals now focus all construction traffic via routing arrangements to the East, and as a consequence construction traffic will not be permitted to impact on these junctions. In terms of other diverted traffic it has also been agreed with TfL and the City of London Corporation that the impacts are relatively localised and as a consequence the area containing New Change and Ludgate Hill will not be influenced by the proposals. The scope of the assessment has been discussed with both TfL and City of London Corporation; these junctions are now excluded from the scope.	The results of all studies and consultation will be reported in the Transport Assessment.
T43			The EIA should include an assessment of footway widths and existing/future levels of footway crowding on routes leading to and from existing and new station entrances.	This is an integral part of the Transport Assessment.	ES Transport Chapter and Transport Assessment.
T44			Reference needs to be made to the City's Guidance Notes for Activities on the Public Highway, regarding scaffold and hoarding designs, which we consider to be Best Practice, and LUL's involvement in the City's Considerate Contractor Scheme.	This will be considered within the Code of Construction Practice (CoCP)(a draft of which will be included as an appendix to the ES) and within the construction logistics plan.	CoCP
T45			Footpath disturbance should be kept to a minimum through efficient coordination, management and good practice.	This will be considered within the Code of Construction Practice (CoCP) a draft of which will be included as an appendix to the ES. This will also be a matter addressed in the Construction Logistics Plan.	CoCP
T46		Socio-economics and community effects	There could be some mention of the impact on businesses image/reputation, and the 'cost' of this, as well as deliveries and access by staff.	The Transport Assessment considers the impact on access to buildings that are neighbouring the project sites. Consideration of the cost of businesses image/reputation arising from any disruption has not been assessed. Such a quantification would be predicated on assumptions to a point where findings would not be considered to be reliable enough to inform a robust assessment within an EIA. Furthermore, any costs would be experienced by businesses on a temporary basis (i.e. during the works period), whereas the costs to the image and reputation of businesses in a reference case where BSCU was not built would be long-term and likely increasing over time. To this end, the socio-economic assessment has emphasised the importance of effective transport interchanges to the functioning of the City of London and its growth, through retention of employment at businesses and enabling growth in levels of employment at businesses, through attracting investment.	ES Socio Economic Chapter.
T47		Property Matters	Any redevelopment of 10 King William St should take account of the amenity to Phoenix House, both during construction, and in the design of the final development. Issues relating to its amenity include having consideration to current access ways into the building, particularly from Nicholas Lane. Noise, dust and vibration transfer should also be considered during the proposed development.	All issues mentioned will be considered within the relevant specialist chapters of the ES. Phoenix House and other potentially sensitive receptors which have the potential to experience 'likely significant effects' will be considered as an integral part of assessments.	ES Chapters.
T48			The City also reserves its position in relation to any impingement of rights of light in relation to Phoenix House.	A rights of light assessment is being undertaken, however this issue and the potential for effects relate primarily to the OSD rather than the Station Works. The rights of light assessment was included within the OSD application.	OSD Application.

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T49			The tunnelling proposals will need to protect the integrity of any buildings it could affect, this relates to Phoenix House, Candlewick House and 116/126 Cannon St.	Building damage assessments are being undertaken and for listed buildings, are reported within the TWAO application. As potentially sensitive receptors enjoying statutory protection, listed buildings are also specifically considered within the heritage assessment of the ES.	Listed buildings - within the ES Heritage Chapter.
T50			The EIA must also take account of the impact of the construction and operation of the enlarged station on the operational requirements of the Mansion House.	Noted. The ES considers the potential for any likely significant effects on Mansion House within the Noise and Vibration, Heritage and Transport assessments which consider Mansion House as a receptor as is necessary.	ES - Noise and Vibration, Heritage and Transport Assessment.
T51	English Heritage	Scope of Assessment	Having reviewed the Scoping Report, English Heritage confirmed that they have no comments to make on the proposed scope of assessment.	The ES will consider potential impacts on heritage receptors as proposed in the EIA scoping report.	ES Heritage Chapter.
T52	Natural England	Scope of Assessment	As set out in the scoping report, Natural England (NE) confirmed that from their review, the TWAO Works do not appear to affect any nationally designated geological or ecological sites or have significant impacts on the protection of soils. NE do not therefore propose to advise on this EIA/Project. NE provided a copy of their 'Advice related to EIA Scoping Requirements'.	NE 'Advice related to EIA Scoping Requirements' was considered in preparing the proposed EIA Scope of Assessment which concluded that Ecology could be scoped out of the assessment.	N/A